Delegated Report		Analysis sheet		Expiry Date:	02/11/2021		
		N/A		Consultation Expiry Date:	08/01/2023		
Officer			Application N	umber(s)			
Kristina Smith			1. 2022/4800/P 2. 2022/5312/L				
Application Address			Drawing Numbers				
Euston Fire Station 172 Euston Road London NW1 2DH			Refer to Draft Decision Notice				
PO 3/4 Area Team	n Signature	C&UD	Authorised Of	ficer Signature			
Proposal(s)							
Replacement of timber doors and metal / timber windows with aluclad doors and windows on the rear (northeast and northwest) elevations at ground to fifth floor levels							
Recommendation(s):	1. Refuse planning permission2. Refuse Listed Building Consent						
Application Type(s):		Planning Perm d Building Co					

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice							
Informatives:								
Consultations								
Adjoining Occupiers:	No. of responses	00	No. of objections	00				
Summary of consultation responses:	Planning permission • A site notice was displayed between 07/12/22 and 31/12/22 • A press advert was published on 15/12/22 Listed Building Consent • A site notice was displayed between 08/12/2021 and 01/01/2022 • A press advert was published on 09/12/2021							
CAAC / Local Groups response:	No responses were received							

Site Description

The site comprises the Grade II* Listed Euston Fire Station situated on Euston Road at the junction with Eversholt Street. Access is from Grafton Place to the rear. The Station was built in 1901-1902 and altered and extended later in the twentieth century. The original part of the building is recognised as a fine example of Arts and Crafts design by architect HFT Cooper of the Fire Brigade Branch of the London County Council Architects' Department. It is referred to in the Bloomsbury Conservation Area Appraisal and Management Strategy as a building that, together with the four storey bow-fronted houses to the north, are 'the only remaining indication of the former smaller domestic scale of the earlier buildings surrounding Euston Square'.

The site is situated in the Bloomsbury Conservation Area.

Relevant History

None applicable

Relevant policies

National Planning Policy Framework 2021

London Plan 2021

Camden Local Plan 2017

A1 Amenity D1 Design

D2 Heritage

Camden Planning Guidance CPG Design 2021 CPG Amenity 2021

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

Assessment

1 Proposal

- 1.1 The proposed works consist of the replacement of all original doors and windows from ground to roof level on the rear (northwest and northeast) elevations.
- 1.2The timber doors would be replaced with powder-coated aluclad (timber frame with aluminium cladding on the external face) doors with double glazed panels.
- 1.3 There are two main types of windows: the single glazed timber framed window with leaded lights would be replaced with double glazed white powder coated crittal windows, whilst the single glazed multipane windows are to be replaced with double glazed aluclad windows.

2 Assessment

- 2.1 The main considerations in the determination of the application are:
 - Design and Heritage
 - Amenity of neighbouring occupies
- 2.2 As the application site is situated within a Conservation Area and the building is Grade II listed, the following statutory provisions are relevant to the determination of these applications are Section 16, 72 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013.
- 2.3 Section 16 requires that in considering whether to grant listed building consent for development which affects a listed building, the local planning authority shall have special regard to the desirability of preserving the listed building, its setting and its features of special architectural or historic interest.
- 2.4 Section 66 of the Act requires that in considering whether to grant planning permission for development which affects a listed building, the local planning authority shall have special regard to the desirability of preserving the listed building, its setting and its features of special architectural or historic interest.
- 2.5 The NPPF terms listed buildings as designated heritage assets. Section 12 of the NPPF provides guidance on managing change to designated heritage assets through the planning system, including avoiding or justifying harm to the special architectural or historic interest of listed buildings. Paragraph 134 states that 'less-than-substantial' harm to a designated heritage asset must be outweighed by the public benefits secured by the proposals, including heritage benefits to the assets.

3 Design and Heritage

- 3.1 Policy D1 (Design) of the Local Plan expects development to comprise details and materials that of high quality and complement the local character whilst Policy D2 (Heritage) relates to designated heritage assets including conservation areas and listed buildings. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.
- 3.2 The Bloomsbury Conservation Area Appraisal and Management Strategy (BCAAMS) cautions that alterations can have a detrimental impact either cumulatively or individually on the character and appearance of the area and an example it cites is *'the use of inappropriate materials/ inappropriately detailed doors and windows'*

3.3The existing original glazing that is proposed for removal is a key architectural feature of the building, where the detailing, fenestrations and materiality contribute to the unique Arts and Crafts typology of the purpose-built Station. The Historic England Listing explicitly states that the building's significance is attributed to the design and materiality of the Station's joinery, highlighting the:

Varied fenestration, combining mullioned-and-transomed and narrower two-light vertical windows, and some oculi. Metal casements with leaded lights.

First and second floors each have four flush-framed mullion-and-transom windows; third floor, faced in stone, has narrower windows set in splayed reveals. Fourth floor has three canted stone oriels of three lights with quoined surrounds, that to left rising to a fifth floor with gable above. The elevation terminates in a canted staircase bay of two lights rising to the third floor; top section is more steeply canted with three lights and stone mullions under a circular roof; above this is a gable with oculus and two small rectangular lights below.'

- 3.4 The existing timber and metal casements, with multi-leaded lights, pivoting hinge openings and original hardware, are of exceptional quality in their design and materiality, and these key features of the original windows cannot be replicated or reproduced accurately or sympathetically in modern joinery. Proposed double glazed aluminium Aluclad joinery units will introduce a contemporary material that is alien to and contrasts with the character of the historic building. The visual character and operational differences between the joinery systems make them unsuitable for older buildings. While it is stated that the Aluclad joinery will replicate the overall design of the original joinery, modern frames and glass can never truly replicate the characteristics of historic, hand-made glazing, which is distinctive for its imperfections and soft reflection of light. Machine made glass produces much harsher, flat reflections. The non-traditional aluminium materiality and simplified design will harm the integrity and character of the building and detract from the overall appearance of the local area and the contribution the Station makes to the Bloomsbury Conservation Area.
- 3.5 In the submitted DAS, it is stated that the existing doors and windows are "...at the end of their life. The windows are single glazed but draughty, some have rotted in places, and some have missing ironmongery." However, historic windows are durable, repairable and made from high-quality materials, but there is no demonstration that a repair-not-replace approach has been explored. During a site visit (9 January 2023), it was noted that the windows were not in significant disrepair and that secondary glazing had been installed in some of the casements. It is expected that instead of wholesale replacement, a comprehensive scheme of cyclical general repair and maintenance and potentially the installation of additional secondary glazing could address any thermal efficiency and noise concerns.
- 3.6 The proposal does not include works that will better enhance or further reveal the significance of the listed building or its contribution to the setting of the Conservation Area. When considered cumulatively, this application is considered to result in 'less than substantial' harm to the significance and character of the Grade II* Listed building and to the character and appearance of the Bloomsbury Conservation Area. 'Less than substantial' harm requires corresponding public benefit to flow from the development if planning permission and listed building consent is to be granted. In this case, there are no limited public benefits provided and they fail to outweigh the identified harm. As such, the proposal is contrary to policies D1 and D2 of the Camden Local Plan.

4 Impact on the amenity of surrounding occupiers

4.1 Owing to the nature of the proposals, there are no amenity implications.

5 Recommendations-

- 5.1 Refuse Planning Permission on the following grounds:
 - The proposed window and door replacements, by reason of loss of historic fabric and inappropriate detailed design, would harm the special interest of the listed building and the character and appearance of the conservation area, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.

5.2 Refuse Listed Building Consent on the following grounds:

 The proposed window and door replacements, by reason of loss of historic fabric and inappropriate detailed design, would result in 'less than substantial' harm to the significance of the listed building as a designated heritage asset which is not outweighed by any planning benefits, contrary to policy D2 (Heritage) of the London Borough of Camden Local Plan 2017.