

# Heritage Statement

## 25 Old Gloucester Street, London WC1N 3AF

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<b>On behalf of:</b>	Box Associates Limited	<b>Ref:</b>	0819

### 1.0 INTRODUCTION

- 1.1 This Heritage Statement has been prepared by Ignus Froneman, Director at Cogent Heritage, on behalf of the Applicant and in consultation with PPM Planning and ATP Architects.
- 1.2 The Heritage Statement supports a planning permission and listed building consent application in relation to changes to extant permissions/consents (see below) for the grade II listed former school at 25 Old Gloucester Street (the 'subject building').
- 1.3 The first of these was granted 21 May 2013 (refs. 2011/6097/P & 2011/6431/L). This included the erection of a single storey extension at the second floor level, and also the installation of an external stair in the front lightwell, from ground floor to basement level, and the installation of a lift and housing. It is understood that this permission has been implemented and is extant.
- 1.4 A subsequent permission/consent, granted 16 November 2021 (refs. 2020/4596/P & 2020/4656/L) is materially relevant, in having established the acceptability of a basement extension and a partial change of use of the front part of the subject building, to provide three flats. This permission/consent included the rebuilding of the non-original rear part of the subject building above ground floor, to provide four new floors, with a plant room on top.
- 1.5 The presently proposed changes include:
  - i. a basement extension, similar to the permission/consent of 2021;
  - ii. a partial change of use of the front part of the building, to provide two flats at the second and third floors, similar to the permission/consent of 2021; and
  - iii. the inclusion of a plant area to the roof of a second floor single storey extension, again similar to the permission/consent of 2021, which included a rooftop plant room.

- 1.6 The author of this report is a qualified heritage consultant with over 20 years of experience in the historic environment. This includes regular appearances as an expert witness at public inquiries, on behalf of both appellants, public bodies and local planning authorities.

### **Purpose of the report, site inspection, research and background review**

- 1.7 This Heritage Statement considers the potential effects of the proposed development on relevant heritage assets, in this case with the focus specifically on the subject building.
- 1.8 The report was informed by desk-based documentary research, and a site visit, in September 2023. On the site visit, the heritage assets in the context of the application site were inspected and photographed from publicly accessible land. The photos used to illustrate this report were taken on the site visit (unless otherwise stated).
- 1.9 The application submission for the permission/consent of 2021 is highly relevant, and has been reviewed, including specifically the information/assessments in the *Heritage Statement* (Montagu Evans LLP, August 2020) (referred to as the 'Montagu Evans Heritage Statement' hereafter).
- 1.10 The Montagu Evans Heritage Statement contains a detailed appraisal of the subject building, including documentary research and a description of the subject building, which is not replicated in this Heritage Statement. In places, reference is made to the Montagu Evans Heritage Statement where relevant.
- 1.11 This Heritage Statement should be read alongside the full suite of submission documents.

### **Heritage assets**

- 1.12 The nearby heritage assets are identified in the Montagu Evans Heritage Statement; of note are:
- i. The **Bloomsbury Conservation Area**, within which the subject building falls (along with the listed buildings noted below).
  - ii. The **Church of St George the Martyr**, listed grade II\* and located immediately adjacent to the north of the subject building, at the SW corner of Queen Square. It is notable that the south facing elevation of the church is separated from the subject building by a narrow, poor quality alleyway. This facing elevation of the church is largely absent of decorative features, albeit it has a large tripartite window, now faced with wire glass panels on the outside, concealing the simple tracery of the windows behind (see **Photos 1-2** below). The church was built in

circa 1706 to the designs of Arthur Tooley, originally as a chapel of ease for St Andrew's Church in Holborn, before later becoming a parish church in its own right in 1723. It was heavily remodelled by S S Teulon in 1867-9. The former parochial schools at 25 and 24 Old Gloucester Street (the latter also by Teulon) were associated with the church, and these buildings retain group value with each other.

- iii. The grade II listed **26 Old Gloucester Street**, to the south of the subject building. It is a terraced house, built in the early C18 and re-faced later the same century. Similar to others in the streetscape, it has a yellow stock brick façade, with red brick details.
- iv. The grade II listed **Mary Ward Centre** and attached railings, at 42-43 Queen Square, opposite the subject building. These were constructed by W Hawkins in the early C18 as terraced houses, and despite alterations retain some original detailing.
- v. The grade II listed **24 Old Gloucester Street**, to the south of the subject building on the opposite side of the street. It was constructed in 1863-1864 by Teulon as a Girls' and Infants' School, associated with the Church of St George the Martyr. It has an early Gothic style, with pointed arched windows, arranged over three storeys, in yellow stock brick with stone dressings.

1.13 As part of the background review and site visit, it has been considered whether other heritage assets could be affected by the proposed development. Insofar as the character, appearance and significance of the Bloomsbury Conservation Area, and the setting of the nearby listed buildings, is concerned, the assessment is undertaken on the basis that a proposal that is acceptable in relation to the grade II listed subject building would be equally acceptable in relation to the Bloomsbury Conservation Area and the settings of the nearby listed buildings.

1.14 It is also noted that the proposed external changes are located at the rear, and would replace a very unsightly steel and wire cage at the top of the building (see **Photo 3** below). Given this, it is not considered that the significance of the Bloomsbury Conservation Area or the nearby listed buildings could be said to be harmed by the proposed development; instead there would be an enhancement. In the interest of a focussed, proportionate assessment the Bloomsbury Conservation Area and the nearby listed buildings are not considered further in detail.



**Photo 1:** The facing elevation of the church is separated from the subject building by a narrow, poor quality alleyway, and this south facing elevation of the church is largely absent of decorative features.





**Photo 2:** The facing elevation of the church is separated from the subject building by a narrow, poor quality alleyway, and this south facing elevation of the church is largely absent of decorative features.





**Photo 3:** The proposed external changes are located at the rear, and would replace a very unsightly steel and wire cage at the top of the building.

## Legislation and policy summary

- 1.15 The section below summarises the key provisions of s.66 & s.72 of the Planning Listed Buildings and Conservation Areas Act 1990, the National Planning Policy Framework and the Development Plan policies.
- 1.16 **Legislation:** Legislation relating to listed buildings and conservation areas is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act). Section 66(1) of the Act sets out the statutory duty in relation to development affecting the setting of listed buildings: and section 72(1) sets out the statutory duty in relation to any buildings or other land in a conservation area.
- 1.17 It is a well-established concept in case law that 'preserving' means doing no harm for the purposes of the 1990 Act. The Court of Appeal's decision in *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] (EWCA Civ 137) established that, having 'special regard' to the desirability of preserving the setting of a listed building under s.66, involves more than merely giving weight to those matters in the planning balance. There is a strong statutory presumption against granting planning permission for any development which would fail to preserve a listed building or its setting (and the same for conservation areas). In cases where a proposed development would harm a listed building or its setting (or a conservation area), the Barnwell decision has established that the duty in s.66 of the Act requires these must be given "*considerable importance and weight*".
- 1.18 The key legal principles established in case law are:
- i. 'Preserving' for the purposes of the s.66 and s.72 duties means 'to do no harm'<sup>1</sup>.
  - ii. The desirability of preserving the setting of a listed building, or the character or appearance of a conservation area must be given 'considerable importance and weight'<sup>2</sup>.
  - iii. The effect of NPPF paragraphs 199-202 is to impose, by policy, a duty regarding the setting of a conservation area that is materially identical to the statutory duty pursuant to s.66(1) regarding the setting of a listed building (and s.72 in relation to the character and appearance of a conservation area)<sup>3</sup>.

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<sup>1</sup> *South Lakeland District Council v Secretary of State for the Environment* [1992] 2 AC 141 per Lord Bridge at p.146E-G in particular (obiter but highly persuasive).

<sup>2</sup> *Bath Society v Secretary of State* [1991] 1 WLR 1303, at 1319 per Glidewell LJ and *South Northamptonshire DC v SSCLG* [2014 EWCA Civ 137] (*Barnwell Manor*), at [22-29] per Sullivan LJ.

<sup>3</sup> *Jones v Mordue* [2015] EWCA Civ. 1243 per Sales LJ [at 28].



- iv. NPPF paragraph 202 appears as part of a 'fasciculus' of paragraphs, which lay down an approach corresponding with the s.66(1) duty (and similarly the s.72 duty)<sup>4</sup>.
- v. If harm would be caused, then the case must be made for permitting the development in question, and the sequential test in paragraphs 200-202 of the NPPF sets out how that is to be done. If that is done with clarity, then approval following paragraph 202 is justified. No further step or process of justification is necessary<sup>5</sup>.
- vi. In cases where there may be both harm and benefits, in heritage terms, great weight has to be given to the conservation and enhancement of a listed building, and its setting, and the preservation and enhancement of a conservation area. It is, however, possible to find that the benefits to the same heritage assets may be far more significant than the harm<sup>6</sup>.
- vii. An impact is not to be equated with harm; there can be an impact which is neutral (or indeed positive)<sup>7</sup>.

- 1.19 **The National Planning Policy Framework:** Section 16 of the revised (September 2023) National Planning Policy Framework (the NPPF) deals with conserving and enhancing the historic environment, in paragraphs 189 to 208. Paragraph 189 of the NPPF states that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.
- 1.20 According to paragraph 194 applicants should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 1.21 According to paragraph 199, which applies specifically to designated heritage assets, great weight should be given to a heritage asset's conservation (the more important the asset, the greater the weight should be). This reflects the provisions of the 1990 Act in that it applies irrespective of whether it involves total loss, substantial harm, or less than substantial harm to significance.

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<sup>4</sup> *Jones v Mordue* [at 28] per Sales LJ.

<sup>5</sup> *R (Pugh) v Secretary of State for Communities and Local Government* [2015] EWHC 3 (Admin) as per Gilbart J [at 53].

<sup>6</sup> *R (Safe Rottingdean Ltd v Brighton and Hove CC* [2019] EWHC 2632 (Admin) as per Sir Ouseley [at 99].

<sup>7</sup> *Pagham Parish Council v Arun District Council* [2019] EWHC 1721 (Admin) (04 July 2019), as per Andrews, J DBE at 38.



- 1.22 Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. It then deals with substantial harm to, or total loss of significance of, different types of designated heritage assets. Paragraph 201 continues on the subject of substantial harm (this level of harm is not relevant to the present proposals).
- 1.23 Paragraph 202, on the other hand, deals with less than substantial harm. Harm in this category should be weighed against the public benefits of the proposal. The National Planning Practice Guidance (NPPG) describes public benefits as “*anything that delivers economic, social or environmental progress*”.
- 1.24 **The Development Plan** is the London Plan (2021) and Camden’s Local Plan (2017).
- 1.25 **The London Plan:** The London Plan 2021 deals with Design at Chapter 3. Policy D4 deals with delivering good design and states that the design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising appropriate analytical tools. The design quality of development should be retained through to completion by, amongst others, ensuring maximum detail appropriate for the design stage is provided.
- 1.26 Policy HC1, entitled “*Heritage conservation and growth*” is the most relevant of the policies in Chapter 7. Parts A and B of the policy deals with strategic considerations/requirements and these are not relevant to determining planning applications.
- 1.27 Part C deals with development proposals affecting heritage assets, and their settings. This part of Policy HC1 requires development proposals to conserve the significance of heritage assets, by being sympathetic to the assets’ significance and appreciation within their surroundings. The policy also requires the cumulative impacts of incremental change from development on heritage assets and their settings to be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process.
- 1.28 **Camden’s Local Plan (2017):** Policy D2 deals with heritage and requires development to preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas and listed buildings. According to the policy, the Council will not permit development that results in less than substantial harm to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm. Specifically in relation to listed buildings, the Council will (amongst others), resist proposals for a change of use or alterations and

extensions to a listed building where this would cause harm to the special architectural and historic interest of the building.

## 2.0 ASSESSMENT OF SIGNIFICANCE

- 2.1 The subject building was listed on 11 January 1999 and the main descriptive text from its list entry on Historic England's National Heritage List is quoted below:

*"St George the Martyr Boys School, now private residence. 1877-8. By J and S Flint Clarkson. Stock brick with yellow brick and some stone dressings, slate roofs. Early Gothic style comparable with No.24 (qv). 4 storeys, with main front to Old Gloucester Street and shallow north front exposed. Front mainly symmetrical with sash windows grouped mostly in pairs and segment-headed, some framed by high pointed arches over tympana. String course over ground storey. Triple gables over top storey, stepped at sides, the centre gable broader and higher; chimneys between gables. Entrances at north end of front and east end of return, both with pointed arches under hood moulds and with pointed fanlights over doors enclosing circular openings. On north-east angle, chamfered cornerstone with biblical quotation and date 1877. Later rear extension of no architectural interest. INTERIOR not inspected. Forms a group with St George the Martyr Church, Queen Square (qv) and No.24 (qv). (The Builder: 14 July 1877; The Builder: 23 February 1878)."*

- 2.2 As the Montagu Evans Heritage Statement notes, the subject building was built as a parochial school for boys, associated with the adjacent Church of St George the Martyr. The list entry notes that the subject building forms a group with Teulon's earlier school, diagonally opposite at 24 Old Gloucester Street. Like 24 Old Gloucester Street, the subject building is in the early Gothic style, and the stock brick elevation with stone dressings is reflective of the design of Teulon's design for the earlier school at 24 Old Gloucester Street. Because of the historic associations with the Church of St George the Martyr, and the design synergy and associations between the subject building and 24 Old Gloucester Street, the three buildings form a group, as noted in the list description.

- 2.3 An inscription on the chamfered corner at the northern end of the façade reads:

*"Glory Be To God  
St George Martyr School  
for 200 Boys  
1877  
The Foundation of God  
Standeth Sure".*

- 2.4 The exterior of the building can be read as three distinct parts. The frontage block to Old Gloucester Street, which is the original four storey early Gothic style school building. Behind this is a later added/reconfigured and utilitarian, undecorated two storey block with a steel cage structure on top. It is notable that the list entry states that the later rear extension is “*of no architectural interest*”. A further, tall, pitch roofed single storey cross-wing is located to the rear.
- 2.5 Ordnance Survey maps (not reproduced here) show that the footprint of the subject building covered the majority of its plot, extending to the rear plot boundary with the properties along Southampton Row. The surrounding townscape at this time retained the original street layout, lined with terraced housing. The footprint of the subject building appears similar to what is shown on the historic Ordnance Survey maps, which means that the existing two storey rear block must have been rebuilt over a pre-existing structure, which is fossilised internally in the basement, where there is still a Victorian character to this part of the subject building. Above that, the original structure has been lost and replaced with an unremarkable, modern structure with the steel structure on top of it.
- 2.6 The frontage block (**Photo 4**) retains its original arrangement, with striking pointed-arched windows, and with the two main entrances each side of the chamfered northern corner similarly detailed. The steeply pitched roof has dramatic, triple gables at the upper storey, with prominent brick chimneystacks, making for an imposing street presence. The frontage block of the subject building is a good quality and attractive example of an institutional building, carried off in the late Victorian early Gothic style. The inscriptions above the main entrance door and on the northern corner provide evidence of the building’s purpose and association with the adjacent church.
- 2.7 The gabled return elevation, again with a prominent brick chimneystack, can be seen obliquely along the alleyway between the subject building and the Church of St George the Martyr. The later rear block, with the steel cage roof structure, can also be glimpsed in some views. Whereas the frontage block has clear architectural and historic interest, and makes a positive townscape contribution, the back of the building – especially the striking steel cage structure, silhouetted as it is against the sky – is an unfortunate detractor within what is an otherwise high quality townscape.





**Photo 4:** The frontage block of the subject building, seen obliquely from Queen Square.

- 2.8 The banded cornice detailing of the frontage block is truncated at the adjoining utilitarian rear extension. The elevational treatment of this later rebuilt part of the building is absent of ornamentation, featuring instead large rectangular window openings under concrete lintels. There is a height disparity between the first floor windows of the frontage block and rear extension; the openings to the rear are set higher. The lack of



consistency in the fenestration, the change in brickwork visible on the north elevation, and change in interior floor levels indicate that this is a later extension to the original building, probably rebuilt over a retained basement structure.



**Photo 5:** The frontage block and rear extension, seen obliquely from the alleyway to the north.





**Photo 6:** The upper part of the rear extension, seen from the alleyway to the north.

- 2.9 The ground floor in the rear section of the building has remnant steel framed Crittall type windows of c. early-mid C20 date (typically 1930s), suggesting this as a likely date for the construction of the rear addition. The cage on top of the rear extension can be seen on an aerial photo of 1948 (**Fig 2**), although it appears to be absent on earlier aerial photos of 1946 (e.g. **Fig 1**), giving a likely construction in the mid 1940s, although the evidence is not absolutely clear.





**Fig 1:** An extract of a 1946 aerial photo, showing the subject building with a red arrow. © Historic England  
RAF\_3G\_TUD\_UK\_112\_VP3\_5229



**Fig 2:** An extract of a 1948 aerial photo, showing the subject building with a red arrow. © Historic England  
RAF\_58\_44\_VP1\_5057

- 2.10 The passageway between the subject building and the Church of St George the Martyr allows for oblique views of the side elevation and rear extension of the building from Queen Square and Old Gloucester Street (as per the earlier **Photo 7**). Fortunately, such views are limited due to the narrow width of the alleyway between the buildings. However, to the extent that the rear extension can be seen, it is plainly an unsightly detractor to the subject building, the setting of the church, the surrounding listed buildings, and the conservation area townscape more generally.



**Photo 6:** The frontage block and rear extension, seen obliquely from Queen Square.

- 2.11 The interior of the subject property is heavily altered. The plan form has been eroded by later alterations and the partial insertion of a new floor level, which are accessed via a separate, later inserted staircase. It appears that the building was never internally especially decorative, typical of institutional buildings of the time, but in any event most internal architectural features have been lost as a result of later conversion; some simple features remain, such as joinery, a plaster cornice at first floor, matchboard panelling, and the main staircase. These are illustrative of the building's original design and its former use as a public school building.
- 2.12 The distinction between the frontage block and the later rear extension is evident in the internal plan form, and differences in the floor levels. The ceiling heights at ground floor level differ by approximately 60cm. The second floor of the rear extension is higher than



the third floor of the frontage block. Consequently, the upper floors in the front part of the building are accessed via a separate staircase from the rear, creating a mezzanine level. As noted in the Montagu Evans Heritage Statement, the subject building is generally in a poor condition, with considerable damage to walls and ceilings, which would require remedial works to bring the building back into use.

- 2.13 The main basement level space comprises a large open area under the later extension. The cast iron columns and internal arcade (**Photo 8**) are of C19 character and likely to be original. The footprint of the frontage block extends into the pavement vaults and comprises a highly cellular arrangement. The basement is in a very poor condition throughout and internal finishes and wall linings have suffered from damp and water ingress. There are some original joinery items, such as doors and shutters to the front area windows, and a couple of simple C19 chimneypieces (e.g. **Photo 9**).



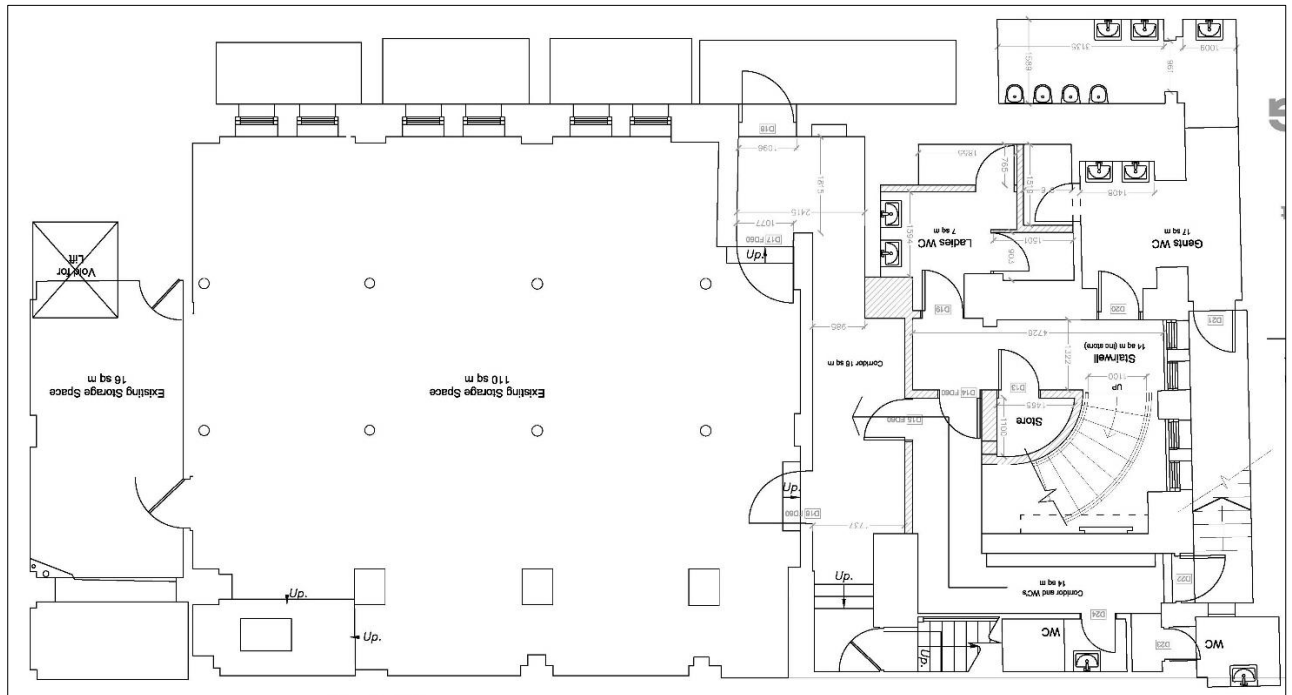
**Photo 8:** The cast iron columns and internal arcade in the basement rear room are of C19 character and likely to be original.





**Photo 9:** A simple C19 chimneypiece to the front basement room.

2.14 It is unsurprising that the 2013 extant permission/consent allowed for the reconfiguration of this area (**Fig 3**).



**Fig 3:** An extract of the basement layout as per the 2013 extant permission/consent.

2.15 The ground floor of the building consists of an entrance hall at the NE corner (**Photo 10**), with simple, robust matchboard panelling, and a suspended modern ceiling concealing a matchboard ceiling (presumed original). This leads on the south side to a small reception room in the frontage block, and beyond that the stairs to the basement. On the west side it leads to a large central room, in the later extension (**Photo 11**). At the rear is a smaller, gabled cross-wing with arched windows and a pitched roof above a single storey (**Photo 12**). As the Montagu Evans Heritage Statement notes, it is unclear how this cross-wing relates chronologically to the rear extension but, stylistically, it adheres more closely to the original frontage block than the rear extension and it has been assumed to be original.



**Photo10:** The ground floor entrance hall.





**Photo 11:** The ground floor extension.



**Photo 12:** The smaller, gabled cross-wing at the back of the ground floor.

- 2.16 The later inserted first floor (**Photo 13**) is accessed from a modern staircase in the frontage block. This part of the building is in a poor condition and it has no features of interest.



**Photo 13:** The later inserted first floor has no features of interest.

- 2.17 There are two reception rooms in the first floor of the original frontage block; the plan form appears to have been truncated at the rear, probably when the rear extension was built in the c. 1930s, although there is a Victorian style cornice to the wall (on the left of **Photo 14**) that may have been added at the time.





**Photo 14:** A first floor front room.

- 2.18 The second and third floors of the frontage block have a similar layout, which is probably original (aside from the removal of an internal partition between the once smaller front rooms) and would likely have been the same at the first floor below, all part of the headmaster's lodgings. They layouts consist of a closet wing at the landing level to the back of the staircase, and with the frontage block divided into two rooms (historically there would have been three rooms per floor), reached via a corridor to the rear.
- 2.19 There are some remaining historic details, mainly at the second floor, including chimneybreasts and plaster cornicing at the second floor (this cornice is absent at the third). The interiors have been altered, with the addition of modern shelving, and some internal alterations, such as blocked/inserted doorways.



**Photo 15:** A second floor front room.



**Photo 16:** A second floor front room.





**Photo 17:** A third floor front room.

- 2.20 **Summary:** In summary, the significance of the subject building is derived primarily from the well-designed Victorian frontage block, designed by J & S Flint Clarkson. This is a good example of a late C19 institutional building in the early Gothic style. The subject building has historic interest as a C19 parochial school, founded in association with the adjacent Church of St George the Martyr, with which it has group value, alongside Teulon's girls' and infants' school at 24 Old Gloucester Street. The rear extension, as the list description rightly notes, has no interest. The rooftop steel cage structure markedly detracts from the host building, the settings of the nearby listed buildings, and the conservation area townscape, though it is fortunately largely obscured from public view.
- 2.21 Internally, the subject building has been heavily altered in places, but retains some original features in the frontage block. These are relatively simple and unremarkable in the context of Victorian architecture, but they are nevertheless of some illustrative value in demonstrating the institutional use of the building. The plan form in the frontage block has been subject to some alteration, but has survived reasonably intact.

### **3.0 IMPACT ASSESSMENT**

3.1 The proposed development can be summarised as:

- i. a basement extension, similar to the permission/consent of 2021;
- ii. a partial change of use of the front part of the building, to provide two flats at the second and third floors, similar to the permission/consent of 2021; and
- iii. a single storey roof extension to replace the steel cage structure, with a plant area above, again similar to the permission/consent of 2021.

3.2 The proposed ground floor and mezzanine level alterations are similar to the 2013 extant permission and there would be no additional impacts on significant features or plan form.

#### **Basement extension**

3.3 The acceptability of the basement extension has been established in the 2013 extant permission and the permission/consent of 2021. The present extension is similar to the approved basement extension of 2013 and this aspect of the proposals is not considered contentious.

#### **Provision of two flats at the second and third floors**

3.4 This partial change of use of the front part of the building, to provide two flats at the second and third floors, is similar to the permission/consent of 2021. The plan form and features of the building at these floors would be retained and the residential use would chime with the historic domestic use of these floors as the headmaster's accommodation, albeit that is now obviously a long-redundant use for the building.

3.5 The partitions, plan form, cornicing etc. would be retained and there would be no material impact on the significance of the building.

#### **Single storey roof extension (replacing the steel cage) with a plant area above**

3.6 The acceptability of the roof extension has been established in the 2013 extant permission, and the permission/consent of 2021 included a roof plant area as is now proposed. The present extension is similar to the approved roof extension of 2013 (with the addition of a small, setback rooftop plant area) and this aspect of the proposals is not considered contentious.

3.7 It might be added that the extension would be visible only in very limited public views along the alleyway and private rear views from the surrounding buildings. The proposal is for a relatively plain structure that would sit unassumingly in the context, creating a

neutral element in those views in which it would be seen. As with the 2013 extant permission, the design/materials would differentiate it from the older rear extension of the host building. The plant room would not be publicly visible. When compared with the existing unsightly and detracting steel cage, the proposed rear extension would improve to the subject building, the setting of the church/nearby listed buildings, and the conservation area townscape more generally.

- 3.8 Overall, there are no indications that the proposed development would cause any additional effects in relation to the listed building when compared with the extant consent/permissions. There would be no harm the significance of the listed host building or the setting of the surrounding listed buildings, or the significance of the conservation area. The proposed rear extension would improve to the subject building, the setting of the church/nearby listed buildings, and the conservation area townscape more generally.

#### **4.0 CONCLUSIONS**

- 4.1 This report has carefully and in detail considered the potential effects of the proposed development. The assessment in this report has demonstrated that the proposed development would preserve the significance of the listed subject building, and improve to the subject building, the setting of the church/nearby listed buildings, and the conservation area townscape more generally.
- 4.2 Because no harm has been identified, there are no policy conflicts with the Development Plan. Neither does the proposed development trigger paragraphs 200-203 of the National Planning Policy Framework. The proposed development also complies with the statutory duties in s.66 and s.72 of the Planning Listed Buildings and Conservation Areas Act, 1990.