



# Heritage Impact Assessment

---

24-28 Bloomsbury  
Way, London

November 2023 | Project Ref 9364A



**Project Number:** 9364A

**File Origin:** [https://heritagecollectiveuk.sharepoint.com/sites/9001-9500/Shared Documents/9301-9400/09364 - 24-28 Bloomsbury Way, London/HER/Reports/2023.11.29 24-28 Bloomsbury Way Heritage Impact Assessment\\_Final.docx](https://heritagecollectiveuk.sharepoint.com/sites/9001-9500/Shared%20Documents/9301-9400/09364%20-%2024-28%20Bloomsbury%20Way,%20London/HER/Reports/2023.11.29%2024-28%20Bloomsbury%20Way%20Heritage%20Impact%20Assessment_Final.docx)

*No text or imagery within this report has been generated by Artificial Intelligence (AI).*

## Contents

<b>1. Introduction .....</b>	<b>1</b>
<b>2. Relevant Planning Policy Framework.....</b>	<b>5</b>
<b>3. Statement of Significance.....</b>	<b>9</b>
<b>4. Heritage Impact Assessment.....</b>	<b>18</b>
<b>5. Conclusions .....</b>	<b>24</b>

## Appendices

**App. 1 Scale of Harm table (HCUK, 2019)**

**App. 2 GPA3 Assessment: Historic England's Guidance on Setting**

# 1. Introduction

**1.1** This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Runway East Ltd. It relates to an application for the introduction of a roof terrace on an existing flat roof at 24-28 Bloomsbury Way. Camden Council (CC hereafter) are the determining authority.

**1.2** 24-28 Bloomsbury Way (**Figure 1**) is a mid to late 20<sup>th</sup> century office building and while not a heritage asset (either statutorily or locally listed), the building is identified as a positive contributor to the Bloomsbury Conservation Area within which it sits. There are also a number of listed buildings in the vicinity of the site.



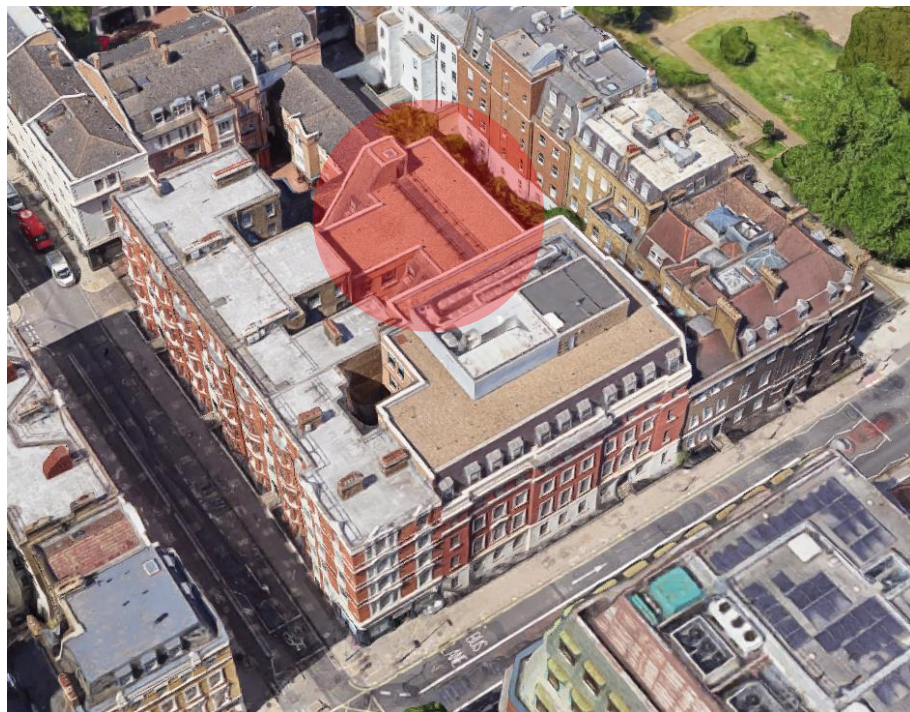
*Figure 1: 24-28 Bloomsbury Way, the application site*

**1.3** In accordance with the requirements of Paragraph 194 of the National Planning Policy Framework (2023) this statement describes the significance of the identified heritage assets.



## The Proposals and Relevant Background

**1.4** To the rear of 24-28 Bloomsbury Way, behind the frontage block, is a lower section of built form with an existing flat roof accessible only with a narrow footway providing access to a stair core beyond (**Figure 2**). The proposed development relates to the introduction of an accessible roof terrace in this location for the use of office staff. Physical works associated with this proposal are limited the introduction of wood effect composite balustrading around the edge of the terrace (set back from the building edge) and new flooring.



*Figure 2: 3D satellite image of the application site with the location of the roof terrace circled*

**1.5** Aside from the conservation area, those heritage assets potentially affected by the proposed development are those in close proximity to the site and, based on a site visit and professional judgement, include:

- Bloomsbury Square Registered Park and Garden (grade II)
- 23 Bloomsbury Way (grade II)
- 20 and 21 Bloomsbury Way (grade II)

- Various listed buildings on the western side of Bloomsbury Square including the grade II\* listed nos.5 and 6
- Church of St George (grade I)



*Figure 3: Site location map (site circled in red) with listed buildings (blue) and the Registered Park and Garden (green). The entire area shown on the map is located within the Bloomsbury Conservation Area*

## 1.6

The proposals have been based on a thorough understanding of the significance of the identified heritage assets and seek to provide a functional roof terrace for the office building while preserving their unique heritage values.

## Purpose of this Assessment

### 1.7

The purpose of this Heritage Impact Assessment is to assist with the determination of the application by informing the decision takers on the effects of the proposed development on the historic built environment. Value judgements on the

significance of the identified heritage assets is presented and the effects of the proposals upon that significance are appraised. Particular regard is given to the provisions of the Planning (Listed Building and Conservation Areas) Act, 1990. The report also sets out how the proposal complies with the guidance and policy of the National Planning Policy Framework (NPPF) 2023 and local planning policy. The site and heritage assets affected have been observed and assessed following a site visit made by the author in August 2023.

## 2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by sections 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.<sup>1</sup>
- 2.2** There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas.
- 2.3** For the purposes of this statement, preservation equates to an absence of harm.<sup>2</sup> Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.<sup>3</sup>
- 2.4** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.5** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:
- The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.*
- 2.6** Historic England has produced guidance on development affecting the setting of heritage assets in The Setting of Heritage Assets (second edition, December 2017),

---

<sup>1</sup> Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

<sup>2</sup> South Lakeland v SSE [1992] 2 AC 141.

<sup>3</sup> Conservation Principles, 2008, paragraph 84.



better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

**2.7** The NPPF requires the impact on the significance of a designated heritage asset<sup>4</sup> to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.<sup>5</sup> The Scale of Harm is tabulated at **Appendix 1**.

**2.8** Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.<sup>6</sup> Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

*Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.*

**2.9** Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

---

<sup>4</sup> The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

<sup>5</sup> Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

<sup>6</sup> The balancing exercise was the subject of discussion in City and Country Bramshill v CC SLG and others [2021] EWCA, Civ 320.

**2.10** Local planning policy for Camden is contained within the Camden Local Plan (2017). Relevant policies from that document are discussed below.

**2.11** **Policy D1 Design:** This policy notes that the Council will seek to ensure high quality design in development which respects local character and context and which preserves or enhances the historic environment and heritage assets. The policy goes on to note that development should comprise details and materials which are high quality and respect the local character and should preserve strategic and local views.

**2.12** **Policy D2 Heritage:** This policy notes that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings. Specifically of designated heritage assets, the policy aligns with paragraphs 201 and 202 of the NPPF. With regards to Conservation Areas, the policy notes that the Council will:

*e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*

*f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*

*g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*

*h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.*

**2.13** Of listed buildings, the policy notes that the Council will:

*i. resist the total or substantial demolition of a listed building;*

*j. 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; and*

*k. resist development that would cause harm to significance of a listed building through an effect on its setting.*

- 2.14** The London Plan 2021 is the spatial development strategy for greater London and as such a piece of relevant planning policy. Of specific relevance is policy HC1 Heritage Conservation and Growth which notes that *"Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings."*

## 3. Statement of Significance

### Assessment of Significance

- 3.1** This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and comments on the contribution of setting to significance. In accordance with paragraph 194 of the NPPF, the descriptions are proportionate to the asset's significance and are sufficient to understand the nature of any impact the proposals may have upon that significance.
- 3.2** With regards to matters of setting, the identification of the heritage assets equates to Step 1 of GPA3, and the assessment of significance equates to Step 2 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 5 (Heritage Impact Assessment) and with the tabular methodology at **Appendix 2**.
- 3.3** It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain aspects or elements could accommodate change without affecting the Government's objective, which includes the conservation of heritage assets and which seeks to ensure that decisions are based on the nature, extent and level of significance of heritage assets. Change is only considered to be harmful if it erodes an asset's significance. Understanding the significance of any heritage asset affected is therefore fundamental to understanding the scope for and acceptability of change.

### Bloomsbury Conservation Area

- 3.4** The Bloomsbury Conservation Area designated in 1968 and encompasses large areas of commercial, institutional, cultural and residential uses and is known for its significant town planning.



**3.5** A Conservation Area Appraisal was undertaken and adopted in 2011 and provides a detailed appraisal of the historic development of the conservation area which is not replicated here for brevity.

**3.6** Built form within the conservation area largely dates from the late 17th to the 19th century with later 20th century expansion and change of use particularly evident in houses being converted to hotels. While the area was originally designated as an example of Georgian town planning the area has been extended to include Victorian, Edwardian and 20th century buildings reflecting the development of the area over time.

**3.7** Terraces of townhouses are predominant in the area and often feature butterfly roofs behind parapets or mansards with mews buildings beyond. Mansion blocks start to appear in the later 19<sup>th</sup> century and are also a commonplace feature within the conservation area. The area's palette of materials is primarily brick with some examples of stone (primarily used for churches and the British Museum), stucco and terracotta.

**3.8** The Conservation Area Appraisal summarises the character of the area as:

*Bloomsbury is noted for its formally planned arrangement of streets and the contrasting leafy squares. The urban morphology comprises a grid pattern of streets generally aligned running north-west to south-east and south-west to north-east, with subtle variations in the orientation of the grid pattern. The quintessential character of the Conservation Area derives from the grid of streets enclosed by mainly three and fourstorey development which has a distinctly urban character of broad streets interspersed by formal squares which provide landscape dominated focal points.*

...

*Overall, the area's hierarchy of main arterial routes, grids of streets, rear mews spaces and narrow lanes creates a noticeable transition in the sense of enclosure moving around the Conservation Area. This dynamic spatial character emphasises the difference in the scale of the component streets and spaces, making each component element and the difference between them notable.*

**3.9** The conservation area is a large area and, in recognition of its varying character and appearance, has been divided into a series of fourteen sub-areas. The application site falls within sub area 7, Museum Street/Great Russell Street, which is described in detail within the adopted conservation area appraisal.

**3.10** This part of the conservation area is defined within the adopted appraisal as:

*The Museum Street area has a very distinctive grain and street pattern consisting of a tight grid of streets containing small, intimately-scaled blocks of development. The area was developed in the later 17th century and retains its early street pattern. During the mid 19th century many of the terraces were rebuilt and re-fronted, reflected by a variety of elevational treatments. The differing character of the area relates to the hierarchy of streets of a range of widths, uses and levels of pedestrian and vehicular use.*

**3.11** The adopted appraisal goes on to note that predominant building types in the area include terraces with some Victorian shop fronts surviving.

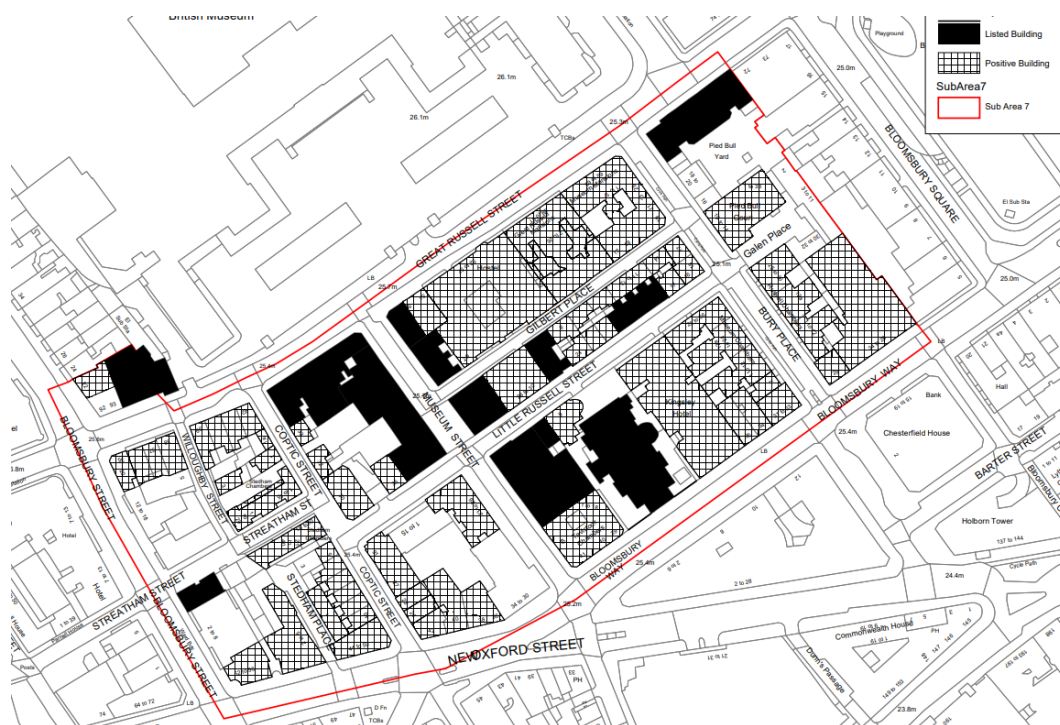


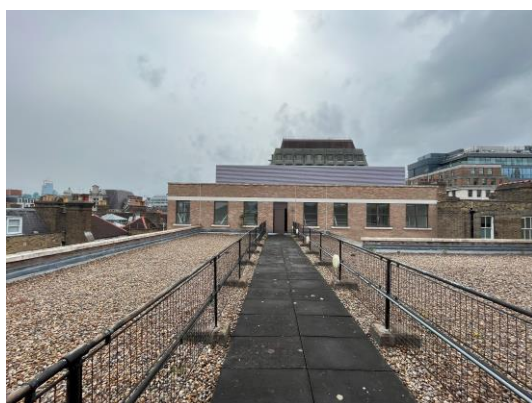
Figure 4: Bloomsbury Conservation Area – sub area 7

**3.12** As shown on the map at **Figure 4**, the application site has been identified as a building which makes a positive contribution to the character and appearance of the

conservation area. However, it is relevant to note that the application site is not specifically referenced in the appraisal's supporting text. The Conservation Area Appraisal notes that buildings identified as 'positive' as buildings *"that contribute to the character of their immediate surroundings and the Conservation Area as a whole. Whilst some of these buildings may have experienced minor alterations over the years, they contribute as part of a group."*

**3.13** The contribution made by 24-28 Bloomsbury Way relates primarily to the character, form and materiality of the building's frontage onto the street which is highly coherent with the wider townscape and which represents a high quality mid to late 20<sup>th</sup> century element of built form influenced by the area's historic architecture.

**3.14** The area of the proposed roof terrace is located to the rear of the building, behind and at a lower level than the frontage structure, meaning that it is not visible from the surrounding streets or spaces. As such, while within the conservation area, this modern flat roof area does not contribute to or better reveal the significance of the designated heritage asset in any way.



*Figures 5 and 6: Photographs of the roof terrace at 24-28 Bloomsbury Way looking south (left) and north (right)*

## Assets to the east of the application site

**3.15** To the east of the application site are a series of listed buildings and, beyond them, the Bloomsbury Square Registered Park and Garden (grade II). While there are other listed buildings in the area, those most capable of being affected by the development include:

- 23 Bloomsbury Way (grade II, UID: 1244466), directly adjacent to 24-28 Bloomsbury Way;
- 5 and 6 Bloomsbury Square (grade II\*, UID: 1244506), on the eastern side of 23 Bloomsbury Way;
- 20 and 21 Bloomsbury Way (grade II, UID: 124464) on the southern side of Bloomsbury Way
- White Hall Hotel and attached railings (grade II, UID: 1244507) to the north of the application site; and
- 14 Bloomsbury Square and attached railings (grade II, UID: 1244452) to the north of the application site.

**3.16** The **Bloomsbury Square Registered Park and Garden** covers a relatively small rectangular area at the centre of the square which comprises the garden laid out in the early 1660s for Thomas Wriothesley, fourth Earl of Southampton, to the south of his house (Southampton House built c 1657, known as Bedford House after 1734). The grade II registered garden is of clear heritage value due to its early date of establishment, its function as one of London's historic square gardens and associations with various well known people (for example including Humphrey Repton).



*Figure 7: View within Bloomsbury Square Registered Park and Garden*



**3.17** To the direct east of the application site is the grade II listed **23 Bloomsbury Way** and opposite that, on the southern side of the road, is the grade II listed **20 and 21 Bloomsbury Way** (and associated area railings). These buildings both date from the mid 18<sup>th</sup> century, potentially built by JI Devall, and are of clear architectural and historic interest due to their form and appearance and their illustrative value as to the architectural and social and domestic practices of the period. Further east on the northern side of the road is the grade II\* listed **5 and 6 Bloomsbury Square** (and associated railings). Architecturally this building is similar to those described above but notably it is slightly earlier (1744) and was designed by Henry Flitcroft, possibly built by JI Devall. The building is also known to retain some original panelled interiors and was the home of Isaac Disraeli, father of Benjamin Disraeli.



*Figure 8: 23 Bloomsbury Way (grade II) and 5 and 6 Bloomsbury Square (grade II\*)*

**3.18** The **White Hall Hotel** (9-11 Bloomsbury Square) and **14 Bloomsbury Square** both date from c.1662-5 and were constructed by T Coxe as a row of houses. These structures have been altered over time, with some aspects of re-fronting and

the introduction of a new stucco to the frontage, however, the buildings survive well as a good example of mid to late 17<sup>th</sup> century domestic architect.



*Figure 9: 20 and 21 Bloomsbury Way (grade II)*



*Figure 10: View across Bloomsbury Square Registered Park and Garden towards the White Hall Hotel and 14 Bloomsbury Square*



**3.19** As with the conservation area, the front elevation of the application site makes a generally positive contribution to the coherent high quality townscape in the setting of these assets. However, the location of the application site, concealed behind the frontage building and no visible from Bloomsbury Square, is well removed from the assets both visually and experientially. As such, while forming part of the wider urban surroundings of these assets, the application site therefore does not contribute to or better reveal their significance.

## Church of St George (grade I)

**3.20** The Church of St George is a grade I listed building (UID: 1272341) and dates to the early 18<sup>th</sup> century by Nicholas Hawksmoor (re-ordered 1781 and restored in 1870 and 1972). As a grade I listed place of worship the building is of exceptional heritage value which primarily relates to its architectural and historic interest as an early 18<sup>th</sup> century example of a Hawksmoor church.



*Figure 11: Grade I listed Church of St George*

- 3.21** The link to Nicholas Hawksmoor, a prolific Baroque architect and former pupil and assistant of Sir Christopher Wren, is of particular interest as are various links to those who have been associated with the church (for example Anthony Trollope was baptised there in 1824). The building is also of clear heritage value as a result of its communal and spiritual value as a long standing place of worship.
- 3.22** The setting of the grade I listed church is entirely urban with the building being located within a grid layout of streets, all of which are heavily developed with built form up to seven storeys in height. Despite the set back of the church from the general building line and height of structures immediately around it, the building remains clearly prominent due to its design, height and materiality.
- 3.23** 24-28 Bloomsbury Way is located c.75m north west of the church, but the application site itself (i.e. the location of the roof terrace which is concealed behind the frontage building) is well removed from the listed, both visually and experientially. While forming part of the wider urban surroundings of the church, the application site therefore does not contribute to or better reveal the significance of the highly important grade I listed building.



## 4. Heritage Impact Assessment

**4.1** This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter, including effects on the setting of those assets. With regards to setting matters, it equates to Step 3 of GPA3, which has a close connection with Step 2. This chapter should be read in conjunction with the preceding chapter, and the tabular GPA3 assessment in **Appendix 2**.

### Proposed Development

**4.2** As identified in the Introduction, proposals entail the introduction of an accessible roof terrace to the rear of 24-28 Bloomsbury Way. The roof terrace is proposed to the rear of the building on an existing flat roof area which is at a lower level than the frontage building (and which is currently partly accessible with a narrow footway leading to a stair core beyond).



Figure 12: Proposed roof terrace at 24-28 Bloomsbury Way

- 4.3** The roof terrace is for the use of office staff and physical works associated with this proposal are limited to the introduction of balustrading (1800mm wood effect composite fencing) around the edge of the terrace (set back from the building edge) and new flooring.
- 4.4** The proposed roof terrace is proposed to only be accessible between the hours of 9am and 5pm.

## Impact Assessment

### Impact on the Bloomsbury Conservation Area

- 4.5** The flat roof forming the application site is located within the conservation area but, as identified in the preceding section, it set behind existing built form on Bloomsbury Way and Bloomsbury Square meaning that it is not visible from street level. Due to the modest physical changes proposed to the flat roof area to facilitate the introduction of the roof terrace, the roof terrace (or those using the roof terrace) is not thought to be visible from the surrounding streets.
- 4.6** Key views within the conservation area typically take in views along streets and views within Bloomsbury Square. These views would not undergo any change and there would be no ability to appreciate the change on the application site from these locations.
- 4.7** The proposals would result in a change of use on the flat roof area taking it from an ancillary back of house space to an area more formally used as an outdoor entertainment area for office users. While this will introduce a degree of activity on to the site not current present, this would not be out of keeping with the character of the conservation area where a variety of uses are present and where there are already various existing roof terraces (for example along Museum Street).
- 4.8** Key characteristics of this part of the conservation area are identified in the adopted appraisal as a distinctive grain and street pattern, 17th century buildings re-fronted in the 19th century with a variety of elevational treatments and differing hierarchy of streets and uses. These aspects of the conservation area would not see

any change as a result of the proposed development. In addition, the contribution 24-28 Bloomsbury Way makes to the conservation area relates to the character, form and materiality of the building's frontage onto the street and this would not be affected in any way.

- 4.9** Overall while amounting to a physical change on the application site and a greater degree of activity to the flat roof area, the proposed roof terrace would not be prominent or dominant within the Bloomsbury Conservation Area. The proposed roof terrace would not cause any erosion of the conservation area's heritage value which relate to the area's formally planned arrangement of streets and the contrasting leafy squares, the area's morphology and high quality built form typically dating from the 17th to 19th centuries.

### Impact on Assets to the East of the Application Site

- 4.10** The proposed roof terrace would not result in any physical effect on the Bloomsbury Square Registered Park and Garden meaning that the heritage values of this asset embodied within its fabric would be entirely preserved. Any change to the setting of the registered park and garden as a result of the proposed development would be wholly limited (and entirely non-visual) given the screening properties of existing built form that lines the western side of Bloomsbury Square. Key views towards, from and within the registered park and garden would be unaffected and the character of the asset's built surroundings (i.e. the character of Bloomsbury Square itself) would be entirely preserved. As a result, the minor proposals to introduce a roof terrace to the west of the registered park and garden would not result in any effect on that asset's significance or the ability to appreciate its significance. The significance of the registered park and garden, which results from its early date of establishment, function as one of London's historic square gardens and associations with various well known people, would be entirely preserved.

- 4.11** There are a variety of listed buildings to the east of the application site on Bloomsbury Way and Bloomsbury Square (west side) which include:

- 23 Bloomsbury Way (grade II)
- 20 and 21 Bloomsbury Way (grade II)
- 5 and 6 Bloomsbury Square (grade II\*)

- White Hall Hotel (grade II)
- 14 Bloomsbury Square (grade II)

**4.12** These assets are visually well removed from the flat roof area where the roof terrace is proposed meaning that there would be no change to views of the front elevation of these listed buildings which is where their significance is best appreciated. Importantly, the proposed development would not result in any change to the skyline or silhouette of the identified listed buildings in views from Bloomsbury Square and Bloomsbury Way.

**4.13** While some views of the roof terrace will be possible from some of the rear elevation windows of the listed buildings east of the site (i.e. those on Bloomsbury Way and Bloomsbury Square) these are not designed views and they already feature dense modern built form, often large scale in nature, due to the tightknit urban environment.

**4.14** It is acknowledged that the proposed roof terrace would introduce a greater degree of activity to the rear of the listed buildings than currently present. However, the proposed 1800mm fencing proposed would screen this from view and the activity in and of itself is not out of keeping with the busy urban environment where the site is located. In this sense, the activity associated with the roof terrace would not result in any erosion of the listed building's heritage values.

**4.15** Overall, the proposals will result in a wholly minor change to the built surroundings of the listed buildings through the introduction of a roof terrace to a modern building at their rear but this is not found to result in any effect on their significance or the ability to appreciate that significance. Their architectural and historic interest due to their form and appearance and their illustrative value as to the architectural and social and domestic practices of the period would be preserved and all fabric associated with these buildings and their general character would be entirely unaffected.

### Impact on the Church of St George (grade I)

**4.16** As noted in the preceding section, the grade I listed Church of St George is located c.75m north west of the application site but there is no intervisibility between the church and site given the scale of the frontage buildings on Bloomsbury Way which



conceal visibility of the flat roofed area. As such, the changes proposed to the flat roof area to create an accessible roof terrace would not lead to any visual or experiential change to the setting or surroundings of the Church of St George. The proposed development does not result in any change to the site's frontage building (i.e. the Bloomsbury Way facing element of no.24-28) and as such the contribution that this building makes to the surroundings of the church would be preserved. Other aspects of the setting of the church which contribute to its significance (i.e. key views of it from Bloomsbury Way and aspects of its historic urban surroundings) would not be affected.

- 4.17** Overall, the proposals would amount to a wholly minor change on the application site which would not lead to any perceptible change to the significance or setting of the grade I listed building. The church would remain as a structure of exceptional heritage value due to its architectural merit, links to Hawksmoor and other important historic figures and its communal and spiritual value as a long standing place of worship.

## Summary and Policy Compliance

- 4.18** The proposed development is based on an understanding of the character of the Bloomsbury Conservation Area, Bloomsbury Square Registered Park and Garden, various listed buildings on Bloomsbury Way and Bloomsbury Square and the Church of St George (grade I), their historic development, significance and where relevant setting. The proposed development has been informed by this alongside desk based research with the proposals being specifically designed to provide a sensitively designed roof terrace on an existing flat roofed area while being sensitive to the significance of the assets.
- 4.19** As identified above, the proposals are found to preserve the significance of the assets identified due to the modest nature of the proposals, generally concealed nature of the application site and the high quality of the proposed interventions. As such, it is the findings of this report that the proposed works would fall outside of the remit of paragraphs 201-202 of the NPPF insofar as they will not result in any harm to, or loss of significance. There would be preservation for the purposes of

Sections 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990.

**4.20** The proposed development is also found to accord with the requirements of local planning policies as follows:

- **Policy D1 Design:** In accordance with the requirements of this policy, the proposed development would respect respects local character and context and preserve the historic environment and heritage assets.
- **Policy D2 Heritage:** The proposed development would meet the requirements of this policy insofar as the scheme would preserve the significance of heritage assets and their settings. With respect to the conservation area the proposals would preserve that asset's character and appearance and with regards to the listed buildings would not result in any harm to their significance through a change to their settings.
- **London Plan Policy HC1:** In accordance with the requirements of this policy the proposed development would conserve the significance of the identified heritage assets and would be sympathetic to the asset's significance and appreciation within their surroundings.

## 5. Conclusions

- 5.1** This Heritage Impact Assessment presents an assessment of significance of the Bloomsbury Conservation Area, Bloomsbury Square Registered Park and Garden, various listed buildings on Bloomsbury Square and Bloomsbury Way and the grade I listed Church of St George. This is followed by an appraisal of the effects of the proposals upon these heritage assets with consideration given to local and national policy and guidance.
- 5.2** 24-28 Bloomsbury Way is a mid to late 20th century office building and while not a heritage asset (either statutorily or locally listed), the building is identified as a positive contributor to the Bloomsbury Conservation Area within which it sits. There are also a number of listed buildings in the vicinity of the site.
- 5.3** To the rear of 24-28 Bloomsbury Way, behind the frontage block, is a lower section of built form with an existing flat roof accessible only with a narrow footway providing access to a stair core beyond. The proposed development relates to the introduction of an accessible roof terrace in this location for the use of office staff. Physical works associated with this proposal are limited the introduction of balustrading around the edge of the terrace (set back from the building edge), new flooring and planting.
- 5.4** Section 5 of this report (in conjunction with the GPA3 compliant assessment at Appendix 2) presents an assessment of the impact of the proposed works on the significance of the identified heritage assets. It concludes that while amounting to change within the conservation area and setting of other heritage assets the proposals are found to preserve the significance of the assets identified due to the modest nature of the proposals, generally concealed nature of the application site and the high quality of the proposed changes to the site.
- 5.5** In summary, the proposed works to the within the conservation area and setting of other listed buildings are considered to be proportionate and compliant with relevant policies contained within Section 16 of the NPPF and relevant local planning policy and guidance. There would be preservation for the purpose of the decision maker's duty under Sections 66 and 72 of the Planning (Listed Building and Conservation Area) Act 1990.

# Appendix 1

## *Scale of Harm (HCUK, 2019)*

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).<sup>7</sup>

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

<sup>7</sup> See NPPG 2019: "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." Paragraph 018 Reference ID: 18a-018-20190723.



## Appendix 2

### *GPA3 Assessment: Historic England's guidance on setting*

In assessing the effect of the proposed development on the setting and significance of non-designated heritage assets, it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

<b>Relevant Considerations</b>	<b>Bloomsbury Square Registered Park and Garden</b>	<b>Listed buildings to the east of the application site</b>	<b>Church of St George</b>
<i>Proximity of the development to the asset</i>	The application site is located to the west of the registered park and garden separated from it by built form on Bloomsbury Square	The application site is located to the west of the listed buildings	The Church of St George is located north west of the application site
<i>Proximity in relation to topography and watercourses</i>	The topography of the area is generally flat and there are no watercourses of relevance in this case		
<i>Position of development in relation to key views</i>	Key views of the RPG are from surrounding streets and within the garden square itself where the asset's historic values can be best appreciated. These views would not undergo any change as a result of the proposed development	Listed buildings in this group are best appreciated in views towards their front elevations. While some of these views are angled towards the application site, the scale of their built form essentially screens visibility of the roof terrace meaning there would be no change to these views	Key views of the grade I listed Church are possible towards its primary elevation from Bloomsbury Way. The application site is well removed (both spatially and visually) from these assets and they would not undergo any change

<i>Degree to which development will physically or visually isolate asset</i>	The proposed development would, in no way, either visually or physically isolate any of the identified heritage assets		
<i>Prominence, dominance and conspicuousness and competition with or distraction from the asset</i>	Due to the location of the flat roof area where the roof terrace is proposed at a lower level behind the site's frontage building and, to the east, built form fronting onto Bloomsbury Square, the roof terrace would not be prominent or dominant within the setting of any of identified heritage assets. While some views of the roof terrace will be possible from some of the rear elevation windows of the listed buildings east of the site (i.e. those on Bloomsbury Way and Bloomsbury Square) these are not designed views and they already feature modern built form due to the tightknit urban environment		
<i>Dimensions, scale, massing, proportions and materials and design</i>	The proposed roof terrace has been carefully designed and scaled within the existing flat roof area to be set back from the roof edges and of a high quality design and materiality		
<i>Introduction of movement or activity</i>	The proposed development would introduce greater levels of activity on to the flat roof area but this is not out of keeping with the busy urban environment (which includes a variety of uses and existing roof terraces) where the site is located and would not result in any harm to heritage assets		
<i>Diurnal or seasonal change</i>	Matters of seasonal change are not relevant in this case. While some diurnal change can be expected, should external lighting be introduced, given the urban nature of the surroundings this would not cause any effect on the significance of heritage assets		
<i>Change to built surroundings and spaces</i>	The proposed development would not lead to any perceptible change to the built surroundings or spaces of the RPG	The proposals will result in a wholly minor change to the built surroundings of the listed buildings through the introduction of a roof terrace to a modern building at their rear. This would not however affect the ability to appreciate their significance in any way	The proposed development would not lead to any perceptible change to the built surroundings or spaces of the grade I listed church
<i>Change to skyline, silhouette</i>	The proposed development would not result in any change to	The proposed development would not result in any change to	The proposed development would not result in any change to

	the skyline or silhouette of built form surrounding Bloomsbury Square	the skyline or silhouette of the identified listed buildings in views from Bloomsbury Square and Bloomsbury Way	the highly significant skyline or silhouette of the grade I listed church
<i>Change to general character</i>	There would be no change to the general character of the Bloomsbury Square RPG or its surroundings which would continue to be appreciated as a busy urban environment with historic built form addressing the garden square	The minor change to the modern roof structure to the rear of the listed buildings on Bloomsbury Way and Bloomsbury Square would not result in any effect on the general character of these assets or that of their settings	There would be no change to the general character of the grade I listed church which would continue to be appreciated as a busy urban environment

## *Standard Sources*

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

[www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)

<http://magic.defra.gov.uk>

[www.history.ac.uk/victoria-county-history](http://www.history.ac.uk/victoria-county-history)

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2021

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)