



Heritage Impact Assessment

26 – 27 Kings Mews,
London

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1. Introduction

- 1.1** This Heritage Impact Assessment has been prepared by HCUK Group on behalf of 1156 Ltd as part of a planning application for the demolition of existing office/warehouse (Class E/B8) at 26 King’s Mews, erection of part three, part four-storey office building (Class E) with basement, and amalgamation with existing office building at 27 King’s Mews.



Figure 1: Site location, red line boundary (left) and aerial image (right)

The Context

- 1.2** The buildings comprising the application site, 26 and 27 Kings Mews, are not designated listed buildings and nor have they been identified as non-designated heritage assets. 55 Gray’s Inn Road and the Yorkshire Grey Public House (both Grade II) are the nearest listed buildings to the site, being located to the north-east and south-east of the application site. Neither asset will be physically affected by the proposal, and the development will not affect the settings of these buildings in any way that would require consideration under planning legislation or policy.
- 1.3** The site is located within the Bloomsbury Conservation Area, and this designated asset is the only heritage asset with the potential to be susceptible to impact by the proposals.

Purpose of this Statement

- 1.4** The purpose of this assessment is to establish what is important in the various heritage assets near the application site, and to assess the effect of the proposed

development on the significance of those assets, including any change or effect within their setting. This assessment is limited to heritage considerations (i.e. harm, if any, weighed against heritage-related public benefit, if any) rather than the wider planning balance.

- 1.5** The heritage assets susceptible to impact have been observed and assessed by the author following a site visits in good weather in September 2023.

2. Relevant Planning Policy Framework

- 2.1** Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision makers in the planning process to pay special attention to the desirability of preserving the character or appearance of conservation areas. This is a duty imposed on the decision maker, not a requirement that the character or appearance of a conservation area should be preserved.
- 2.2** For the purposes of this statement, preservation equates to an absence of harm.¹ Harm is defined in paragraph 84 of Historic England’s Conservation Principles as change which erodes the significance of a heritage asset.²
- 2.3** 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.
- 2.4** 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.*
- 2.5** The NPPF requires the impact on the significance of a designated heritage asset³ 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

¹ South Lakeland v SSE [1992] 2 AC 141.

² Conservation Principles, 2008, paragraph 84.

³ 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.

away much of the significance of a heritage asset.⁴ The Scale of Harm is tabulated at Appendix 1.

2.6 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.⁵ 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.

2.7 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.

2.8 One of the overarching objectives of sustainable development, as expressed in paragraph 8 of the NPPF, is mitigating and adapting to climate change, including moving to a low carbon economy. Historic England has a Climate Change Strategy, and has published Mitigation, Adaptation and Energy Measures. More specifically, Historic England has published a Heritage and Climate Change Carbon Reduction Plan (March 2022). These and similar strategies run in parallel with heritage-specific methodologies relating to the assessment of significance, and the effect of change on significance.

London Plan

2.9 The London Plan 2021 was published on 2nd March 2021 and now comprises part of the development plan for decision making in Greater London. Policy HC1 “*Heritage conservation and growth*” requires that:

⁴ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁵ The balancing exercise was the subject of discussion in City and Country Bramshill v CC SLG and others [2021] EWCA, Civ 320.

C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D - Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

Local Plan Policy

Camden Local Plan

2.10 Relevant local policy is contained within the following:

- Camden's Local Plan (July 2017) – Policy D2 relating to heritage, which recognises Camden's wider historic environment and sets out to ensure that its heritage, including but not limited to listed buildings, will be conserved; and Policy D1 relating to design, which requires development to preserve or enhance the historic environment and heritage assets.
- Camden Planning Guidance Design (November 2018) – includes Chapter 3 which relates to Heritage.

2.11 In April 2011 the London Borough of Camden produced a detailed assessment of the Bloomsbury Conservation Area which noted the diversity and complexity of its character, appearance and historic development. The character of mews buildings was summarised in paragraph 3.9 of the document as being a "common theme" across the area. Only Nos. 20 – 22 Kings Mews are noted to make a positive contribution to the character and appearance of the conservation (Paragraph 5.190).

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 (where applicable) it comments on the contribution of setting to significance.
- 3.2** There is one designated heritage asset, the Bloomsbury Conservation Area, which has the potential to be affected by the proposals and the contribution of the application site to the character and appearance of the conservation area is therefore considered further below.

Heritage Assets

Bloomsbury Conservation Area

- 3.3** The Bloomsbury Conservation Area is a large area which is characterised by fourteen sub-areas. The Conservation Area was designated in 1968 and encompasses large areas of commercial, institutional, cultural and residential uses and is known for its significant town planning. The buildings largely date 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.
- 3.4** The application site, 26 – 27 Kings Mews, is not specifically mentioned within the Conservation Area Appraisal, however the mews and Kings Mews are noted more generally as follows:

The mews were developed as service streets for the larger houses in the principal streets. Their distinctive character derives from the smaller scale of the street, the footprint and scale of the mews buildings (mostly of two storeys their elevational treatment reflecting their original use with large ground-floor openings and small openings on the upper floors, and building lines immediately

behind the street edge. There are a few instances where original cobbles survive, such as in Brownlow Mews, although most of the mews have been covered in tarmac. The mews tend to have narrow entrances, often incorporated into archways in buildings, which give a strong sense of enclosure.

Whilst pressure for change has led to many of the original mews buildings being replaced, Doughty Mews and the northern end of Brownlow Mews arguably contain the best surviving examples of original mews buildings although many have been altered. Mews buildings which retain their historic interest include Nos 20-22 Kings Mews and No 1 Northington Street. No 5 is a modern take on a mews house, designed by Bill Greensmith Architects in 2005. No 9 Doughty Mews is late 20th century mews house designed by Stephen Greenberg and Dean Hawkes, and its immediate neighbour by Piers Ford at No 10-11 has an automated glass roof. Cockpit Yard, named after a fashionable 18th century cockfighting venue, together with John's Mews, has a greater number of recent interventions, although their fundamental character is retained; it is home to the Cockpits Arts organisation. North Mews has been entirely redeveloped, and much of the southern stretch of Kings Mews has been rebuilt.



Figure 2: No. 26 (left) and No. 27 (right) Kings Mews

3.5

As noted above, a number of the mews buildings on Kings Mews have been rebuilt, including No. 27, which forms part of the current application (Figures 2, above, and 4 and 5, below). No. 26 has been in use as a warehouse, and has undergone much alteration to its main façade, which is now boarded at ground floor level and comprises three windows at first floor level (Figure 3, below). Given the proposal to demolish and rebuild No. 26, the specific contribution it makes to the character and appearance of the Conservation Area is considered in further detail below.



Figure 3 (left): Front elevation of No. 26 Kings Mews, and Figure 4 and Figure 5: (right and below) views along Kings Mews showing the redeveloped mews buildings



The contribution of 26 Kings Mews to the character, appearance and significance of Bloomsbury Conservation Area

- 3.6** No. 26 Kings Mews is not considered to be a ‘positive contributor’ to the Bloomsbury Conservation Area, and as noted above has undergone much alteration externally. However, given the proposal for demolition, full consideration has been given to any contribution which the existing buildings makes in accordance with the guidance issued by Historic England on the identification of important buildings in conservation areas, which has been available in various forms for many years. It was originally expressed in terms of ten questions and is currently contained in a checklist of twelve questions in Table 1 of Conservation Area Designation, Appraisal and Management, Second Edition, 2019 (Historic England Advice Note 1).
- 3.7** It is generally accepted that the questions are not criteria to be met or otherwise, and that a balanced overall assessment is required with reference to the “checklist”. Historic England’s position, set out in the “Positive Contributors” box after paragraph 49 of the guidance, is that “A positive response to one or more of the following may indicate that a particular element within a conservation area makes a positive contribution, provided that its historic form and value have not been eroded”. It should be noted that substantial external alterations have eroded the original character of No. 26 Kings Mews.
- 3.8** The twelve questions in the checklist have been answered in the table on the next page. Although a “yes” has inevitably been recorded against some standard answers (a “no” would be difficult to record to some of the questions in any circumstances) a balanced interpretation of the result would be that there is no reason to suppose that No. 26 Kings Mews makes any valuable contribution to the character and appearance of the conservation area.

Question	Answer
<i>Is it the work of a particular architect or designer of regional or local note?</i>	No.
<i>Does it have landmark quality?</i>	No.
<i>Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form or other characteristics?</i>	<i>Yes, in a general sense that the conservation area contains other brick buildings dating to the early 19th century, but no in the sense that most of the other characteristic mews buildings here have been taken down, including the adjacent No. 27 and others along Kings Mews.</i>
<i>Does it relate to adjacent designated heritage assets in age, materials or in any other historically significant way?</i>	<i>No. The front elevation is superficially similar to other mews buildings in the conservation area however those adjacent have been, or are in the process of being, rebuilt.</i>
<i>Does it contribute positively to the setting of adjacent designated heritage assets?</i>	<i>No, there are no adjacent designated heritage assets.</i>
<i>Does it contribute to the quality of recognisable spaces including exteriors or open spaces within a complex of public buildings?</i>	No.
<i>Is it associated with a designed landscape, e.g. a significant wall, terracing or a garden building?</i>	No.
<i>Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?</i>	<i>Yes, but to a very limited extent.</i>
<i>Does it have significant historic associations with features such as the historic road layout, burgage plots, a town park or a landscape feature?</i>	<i>Yes, to the extent that the name of the street and its subservient character to the adjacent parallel streets is a reminder of the former mews function.</i>
<i>Does it have historic associations with local people or past events?</i>	No.
<i>Does it reflect the traditional functional character or former uses in the area?</i>	<i>Yes to an extent, it is recognisably a mews building, however its façade is much altered having been in use as a warehouse and therefore it no longer appears as a dwelling.</i>
<i>Does its use contribute to the character or appearance of the area?</i>	<i>No. The alterations to the main façade of the building have substantially eroded its character and appearance and it no longer appears as a 'mews house' and nor does it positively contribute to the character and appearance of the area.</i>

4. Heritage Impact Assessment

Introduction

- 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 (if or where applicable) effects on the setting of those assets.



Figure 6: Proposed front elevations, 26 and 27 Kings Mews

Impact Assessment

- 4.2** The proposals comprise the demolition of existing office/warehouse (Class E/B8) at 26 King's Mews, erection of part three, part four-storey office building (Class E) with basement, and amalgamation with existing office building at 27 King's Mews. The proposed front elevations are shown below at Figure 6, and a complete set of drawings have been produced by Sabbadin Corti Architects and submitted as part of the application.
- 4.3** There is one designated heritage asset with the potential to be affected by the proposals, solely the Bloomsbury Conservation Area within which the application site is located.

- 4.4** The proposed replacement building at No. 26 Kings Mews has been designed in order to tie-in with and complement the existing streetscene, which comprises a number of contemporary mews-style designs ranging from 3 – 4 storeys in height. The material palette proposed likewise draws upon the existing built form, and will add further coherence to street frontage.
- 4.5** As noted in the preceding section, No. 27 Kings Mews is a modern building which has replaced an historic mews house, and No. 26 has been in use as a commercial warehouse and its character has been substantially denuded. No. 26 currently makes no positive contribution to the character and appearance of the Bloomsbury Conservation Area, and its demolition is not considered to pose any harm to the significance of the conservation area as a heritage asset.
- 4.6** The application site does not contribute to the setting or significance of any other designated or non-designated heritage assets in the wider area, and therefore no additional effects are posed.
- 4.7** The replacement building has been sensitively designed, and will make a positive contribution to the overall architectural quality of this predominantly redeveloped street, and in doing so is considered to have an overall neutral effect on the character and appearance of the Bloomsbury Conservation Area.
- 4.8** Given the above, there would be preservation for the purposes of the decision maker's duty under Section 72 of the Planning (Listed Building and Conservation Area) Act 1990 and the proposals are found to comply with local planning policies and guidance.

5. Conclusions

- 5.1** This Heritage Impact Assessment has been prepared by HCUK Group on behalf of 1156 Ltd as part of a planning application for the demolition of existing office/warehouse (Class E/B8) at 26 King’s Mews, erection of part three, part four-storey office building (Class E) with basement, and amalgamation with existing office building at 27 King’s Mews.
- 5.2** There is one designated heritage asset, the Bloomsbury Conservation Area, which was considered to have the potential to be affected by the proposals, and the contribution of the application site to the character and appearance of the conservation area has therefore been fully considered as part of this assessment.
- 5.3** The application site comprises one modern replacement building (No. 27 Kings Mews) and one substantially altered mews building (No. 26 Kings Mews), which the proposals seek to demolish and replace. No. 26 Kings Mews is not considered to be a positive contributor within the Bloomsbury Conservation Area and is not identified within the Conservation Area Appraisal. Like many of the buildings which form Kings Mews it has undergone substantial alterations to its façade which have denuded any architectural interest.
- 5.4** The replacement building has been designed responsively and will improve the overall aesthetic appearance and architectural quality of the street frontage, and the overall effect on the character and appearance of the conservation area is therefore considered to be neutral.
- 5.5** In conclusion, there would be preservation for the purposes of the decision maker’s duty under Section 72 of the Planning (Listed Building and Conservation Area) Act 1990 and the proposals are found to comply with local planning policies and guidance.

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).⁶

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

⁶ 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.

Standard Sources

<https://maps.nls.uk>

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

www.heritagegateway.org.uk

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

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)