



Heritage Statement

Lytton Court, Barter St, Bloomsbury, London WC1A 2AH

Full Application

March 2025

1	INTRODUCTION	2
1.1	Aim of this Report	2
2	SITE SUMMARY	3
2.1	Location	3
2.2	Heritage Designations	3
2.3	Planning History	4
3	HISTORY AND DEVELOPMENT	7
3.1	Background of the Area	7
3.2	History and Development of the Subject Site	11
4	CHARACTER APPRAISAL OF THE AREA	15
4.1	Relevant Neighbouring Buildings	16
5	SIGNIFICANCE ASSESSMENT	22
5.1	Introduction	22
5.2	Significance of the Subject Site	22
5.3	Contribution to the Conservation Area and the Setting of Listed Buildings	22
5.4	Significance and Setting of the Immediate Neighbours	23
6	PROPOSALS & IMPACT	25
6.1	Pre-Application Feedback and Design Development	25
6.2	Design Reasoning and Assessment of Impact	26
6.3	Visual Impact Assessment	28
6.3.1	Viewpoint 1	29
6.3.2	Viewpoint 2	31
6.3.1	Viewpoint 3	33
6.3.1	Viewpoint 4	35
6.4	Summary of Impact and Public Benefits	37
7	HERITAGE POLICY CONSIDERATIONS	38
7.1	National Planning Policy Framework (NPPF) (February 2025)	38
7.2	London Borough of Camden Local Plan (2017)	39
8	CONCLUSION	40
9	Appendix	41
9.1	Research Resources & Notes	41

1 INTRODUCTION

1.1 Aim of this Report

This report has been prepared by AndHeritage Ltd on behalf of the owner of Lytton Court, Barter Street, Bloomsbury, and will refer to this property as “the site” or “the subject site”. This report has been produced to accompany a full application to construct a roof extension on the existing building, taking into account recent pre-application feedback.

The subject site is within the Bloomsbury Conservation Area in The London Borough of Camden (LBC). It is not listed, nor has it been identified as a “positive building” within the Bloomsbury Conservation Area appraisal (2011) and associated mapping. It was developed in the late 1980s. The subject site can be summarised as a modern brick-built residential block of four storeys at the junction of Barter Street and Bloomsbury Court, providing 11 flats.

Rodic Davidson Architects has provided architectural drawings and an associated design and access statement, which details the proposed scheme. Maddox Planning has provided a planning statement. These documents should be considered in conjunction with this report.

The document's content and level of detail align with the requirements outlined in the NPPF (February 2025), along with Historic England's 2019 guidance regarding Heritage Statements. The NPPF underscores the importance of submitting information at a level of detail that is tailored and proportionate to the site and the proposals to enable informed decision-making. Such detail should be commensurate with the significance of the heritage asset(s) involved and their potential impact (NPPF, 2025, paragraph 207).

This report has been prepared by Emily Anderson, BArch (Hons) MSc IHBC, architectural conservation consultant and director of AndHeritage Ltd. This assessment has been carried out as a desk-based study with a site inspection, carried out in March 2024 of the relevant parts of the building and Conservation Area affected by the proposals.



Figure 1: Lytton Court, Barter Street – The subject site

2 SITE SUMMARY

2.1 Location

The site is located in a quiet pocket of Bloomsbury, south of Bloomsbury Square Garden and north of the A40 (High Holborn). The subject site is located at the junction of Barter Street and Bloomsbury Court. The nearest tube station is Holborn, located some 180m east of the site.



Figure 2: OS map of the area, site indicated in red

2.2 Heritage Designations

The subject site is an unlisted modern block of flats dating from the 1990s. The council have not identified the site as a positive or negative contributor to the Conservation Area. The site is located at the southern edge of sub-area 6 of the Bloomsbury Conservation Area, which was first designated in 1968 with several later extensions. As a large Conservation Area, only the parts most relevant to the subject site and the nature of the proposals have been included in this report.

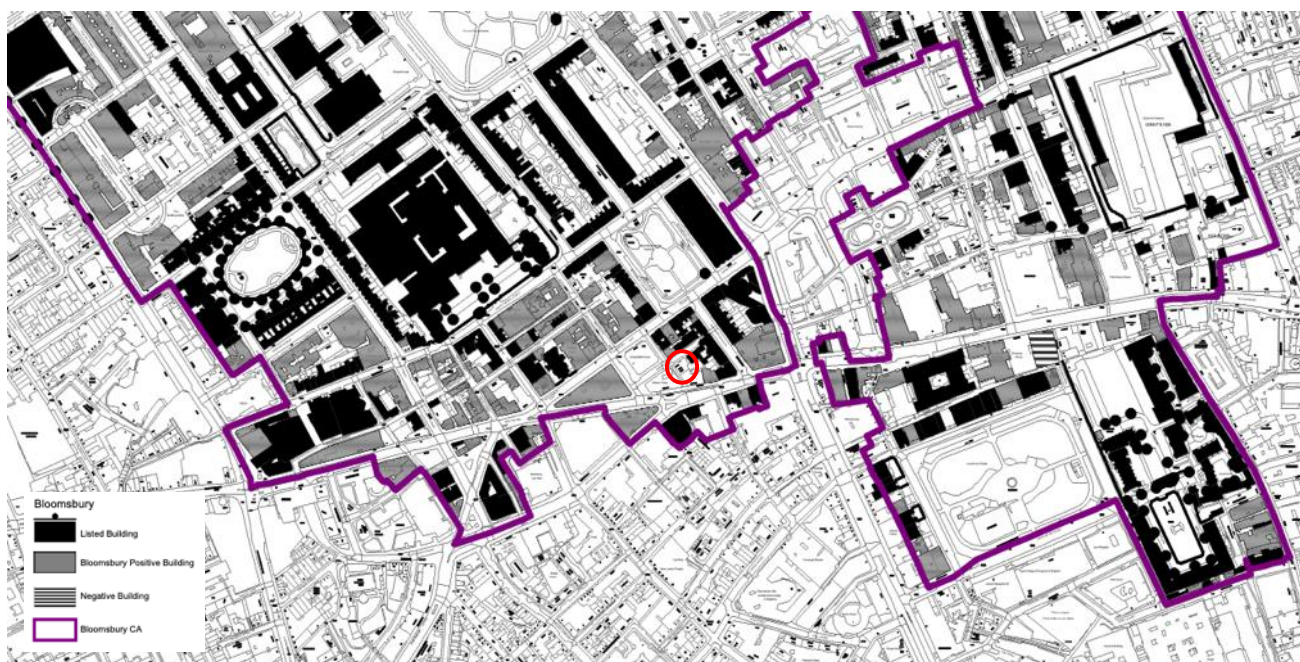


Figure 3: Bloomsbury Conservation Area townscape appraisal map by LBC (2013). The site is indicated in red



Figure 4: Extract of Bloomsbury CA sub-area 6 Townscape appraisal map by LBC (2010). The subject site is indicated in blue.

There are several designated and non-designated heritage assets in the site's vicinity:

- Nos. 16,16A,18,18A,20 AND 20A, Barter Street (Grade II) – immediate neighbour northeast of the subject site
- 21 Barter Street (Grade II) – north (diagonally opposite) of the subject site
- 17-18 Barter Street – (identified positive building, not listed) – north (directly opposite) of the subject site
- Nos. 20 and 21 and attached railings, Bloomsbury (Grade II)
- Nos. 4 & 4a Bloomsbury Square – (identified positive building, not listed)
- Nos. 2 & 3, Bloomsbury Square (Grade II)
- No. 1 and attached railings, Bloomsbury Square (Grade II)
- Nos. 46 and 47 and attached railings, Bloomsbury Square (Grade II)
- 23 Southampton Place – (identified positive building, not listed)
- Nos. 14-22 and attached railings, Southampton Place (Grade II*)
- Nos. 1-8 and attached railings, Southampton Place (Grade II*)
- 127 and 129, High Holborn (Grade II)
- 130-132 High Holborn (identified positive building, not listed)
- Bloomsbury Square (Grade II - Park and Garden)

Whilst there are more heritage assets further afield, these have been scoped out of this assessment due to their distance and lack of intervisibility with the subject site. All nearby heritage assets, including any identified unlisted positive and negative buildings, are illustrated by the council's Townscape appraisal map above.

The subject site is within a tier 2 archaeological priority area, "Camden APA 2.11 London Suburbs".

2.3 Planning History

A planning history search has been undertaken for the subject site and the following applications are considered relevant to this application. Please note that the site in its current form represents the previous sites of No. 14 Barter Street and Nos. 1-3 Bloomsbury Court. The site was developed alongside the works to the previous British Museum tube station building (133-136 High Holborn).

Application reference	Description of Works	Decision Date	Status
N14/23/L/13666 (Address includes 14 Barter Street and 1-3 Bloomsbury Court)	The use of the site of 14 Barter Street and 1,2,&3 Bloomsbury Court W.C.1 for a limited period for a car park.	16-05-1972	Refused
N14/23/L/21550 (Address includes 1-3 Bloomsbury Court)	The erection of a building of basement, ground and 3 storeys over for use as basement stores, ground floor shops, 1st floor offices and 2nd and 3rd floors residential purposes.	30-09-1975	Approved
N14/23/L/33655/R1 (Address includes 1-3 Bloomsbury Court)	Renewal of the planning permission of 9th February 1977 (Registered No. 21550(R1)) for the erection of a building of basement, ground and three storeys over for use as basement stores, ground floor shops, first floor offices and second and third floors residential purposes subject to the conditions imposed thereon and subject to a variation in the mix of the residential accommodation to be provided in the scheme (continued on attached sheet)	26-01-1982	Approved
8702031 (Address includes 133-136 High Holborn 1-3 Bloomsbury Court and 14-20 Barter Street)	The redevelopment of the sites of 133-136 High Holborn 1-3 Bloomsbury Court and 14 Barter Street by the erection of a 6-storey building containing 2 shops offices and 10 flats as shown on drawing numbers A1/1484/ 001/E 002/D 003/F 005/A 006/B 007/C 008 009/B 013 014 015 & 016 revised by letter dated 12th October 1987.	31-07-1987	Refused
8702032 (Address includes 133-136 High Holborn 1-3 Bloomsbury Court and 14-20 Barter Street)	Redevelopment of 133-136 High Holborn 1-3 Bloomsbury Court and 14 Barter Street to provide a new building for use as shops offices and residential accommodation; refurbishment and restoration of 16-20 Barter Street for use as shops and residential accommodation; formation of landscaped courtyard parking area on land at the rear known as Monarch Yard. *(REVISED Plans submitted).	31-07-1987	Appeal received against the Council's failure to issue their decision within an appropriate period. The outcome was not recorded.
8800104 (Address includes 133-136 High Holborn 1-3 Bloomsbury Court and 14-20 Barter Street)	The redevelopment of 133-136 High Holborn/1-3 Bloomsbury Court and 14 Barter Street by the erection of a part 4 part 6 storey building for use as offices (Class B1 of the Town and Country Planning (Use Classes) Order 1987) (Class A2) and 10 residential flats with car parking for 7 cars and the refurbishment of 16 18 & 20 Barter Street for retail (Class A1) on the basement and ground floors and a total of 3 x 2 bedroom maisonettes on the upper floors as shown on drawing numbers A1/1484/45A 46A 50 & 60-67 revised by letters dated 26th May 1988 27th July 1988 and 4th August 1988.	03-03-1988	Approved
8800105	Redevelopment of 133-136 High Holborn/1-3 Bloomsbury Court and 14 Barter Street; refurbishment and restoration of 16-20 Barter Street; formation of landscaped courtyard parking area on land at rear known as Monarch Yard. New buildings to	03-03-1988	Appeal received against the Council's failure to issue their

(Address includes 133-136 High Holborn 1-3 Bloomsbury Court and 14-20 Barter Street)	be used as offices (Class A2 and B1) and residential. Restored buildings to be used as retail (Class A1) and residential. *(Plans submitted).		decision within an appropriate period. Appeal withdrawn
8900102 (Address includes 133-136 High Holborn 1-3 Bloomsbury Court and 14-20 Barter Street)	Approval of landscaping details pursuant to condition 3 03 of planning permission dated 19th August 1988 (Reg. No.PL/8800104/R2) for redevelopment of site by the erection of a part 4 part 6 storey building for use as offices (Class B1 of the TCPUCO87) (Class A2) and ten residential flats with car parking for seven cars and the refurbishment of 16 18 and 20 Barter Street for retail (Class A1) on the basement and ground floors and a total of 3 X 2 bedroom maisonettes on the upper floors (as shown on drawing numbered A1/1484/W002).	11-01-1989	Approved
8900364 (Address includes 133-136 High Holborn 1-3 Bloomsbury Court and 14-20 Barter Street)	Approval of details of facing materials pursuant to condition 01 of planning permission dated 19th August 1989 (Reg.No. PL/8800104/R1) for the redevelopment of the site.	02-08-1989	Approved
9000368 (Address includes 133-136 High Holborn 1-3 Bloomsbury Court and 16-20 Barter Street)	Amendment of planning permission dated 19th August 1988 (Reg.No. PL/8800104/R2) for redevelopment of site by new residential office and retail block replacing caretaker's accommodation by additional studio flat as shown on drawing number A1/1484/61C.	07-08-1990	Approved

3 HISTORY AND DEVELOPMENT

The following desk-based research has been informed by the resources listed in the appendix, in conjunction with professional observation, interpretation and knowledge.

3.1 Background of the Area

The Bloomsbury area dates back to the 1660s as part of London's early expansion northward, representing a period of growth following the devastation caused by the Plague and Great Fire. Bloomsbury replaced the Medieval manors and associated pastoral and agricultural land that previously occupied this area, at the time located away from the city and outside Londinium's Roman walls. High Holborn marks the approximate Roman Road leading westwards from Londinium. The design of the success of the newly developed Covent Garden played a significant role in shaping Bloomsbury's architecture and layout. In 1630, Inigo Jones introduced Palladian architecture to England with the creation of a public square, flanked by arcaded terraces and a church, encompassed by a grid of streets. This new approach superseded the previous narrow medieval streets and courtyards, setting a new standard for development; a trend which can be seen at Bloomsbury.

Initially, the area's development featured a mix of several uses and building types, including housing, markets, commercial, and cultural buildings (notably the British Museum, founded in 1753). In 1661, the 4th Earl of Southampton obtained permission to build Bloomsbury Square, located south of Southampton House. Smaller residences for artisans and workers were planned in the surrounding area (including that of the subject site), as well as a market near Barter Street (originally "Silver Street") known as Bloomsbury Market. This area was known as Lord Southampton's "little town" owing to the variety of uses and housing, creating a self-contained character.



Figure 5: 1682 map by William Morgan. This is the earliest detailed map of the site, shown here as part of the modest terrace on Silver Street, a secondary connecting street or lane. Bloomsbury Market is immediately west. (source: OldMapsOnline)



Figure 6: 1799 map by Richard Horward. By the start of the Victorian period, Bloomsbury Court was established, and the terraces on Silver Street appear broken, likely resulting in the redevelopment of the site. (source: OldMapsOnline)



A depiction of the 'rookery' of St Giles parish, in 1800

Later Victorian development to the north focused on providing grand residential areas for the wealthy, developed by various speculative builders. This period also saw the introduction of new uses, as well as various changes to existing buildings and layouts. Notably, some of the area's older and poorer neighbourhoods were redeveloped. Of particular relevance is that of St Giles High Street, which had become a notorious slum known as the St Giles Rookery; this was addressed by the building of New Oxford Street between 1844-47, thus removing some of the area's worst alleyways and tenements and providing a new shopping and commercial area.

However, certain redevelopment plans faced opposition from residents due to the proposed loss of historical buildings and character within the area. One such example was the proposed complete redevelopment of the area immediately north of the subject site, now known as Bloomsbury Village or Little Bloomsbury. This area was earmarked for redevelopment in the 1960s for the new British Library; however, strong local opposition was successful in preventing the development.

Figure 7: The St Giles Rookery, demolished to make way for New Oxford Street (source: Pasttense.co.uk)



Figure 8: 1896 OS map showing High Holborn Road realignment into New Oxford Street, with the urban blocks to the west of Bloomsbury Court being completely redeveloped. The subject site has developed further since the previous map, and many previous terraces have changed or been extended rearwards. Bloomsbury Market has been lost and now appears to be housing. (source: National Library of Scotland: Reproduced with the permission of the National Library of Scotland)

Throughout the 20th century, Bloomsbury saw continued development and growth of hospital, educational, and cultural institutions. World War II and the Blitz inflicted significant damage, prompting the replacement of older housing and bomb-damaged sites with large-scale projects like the Brunswick Centre and Lasdun's Faculty of Education. Whilst Barter Street escaped any recorded bomb damage, 10 Bloomsbury Way was damaged and the whole wedge-shaped block was marked for clearance. The resulting Bloomsbury Building (1947), alongside other larger scale developments such as the art-deco style Commonwealth House on High Holborn (1939), introduced a coarser urban grain and larger scale to the previously finely-grained intimate context of the subject site.

Immediately south of the subject site at the junction of High Holborn and Bloomsbury Court was the original site of the British Museum Station. This previous underground station opened in 1900 and was part of the central

line, providing convenient access to the Museum. However, the construction of Holborn Station on the Piccadilly line only 150m away reduced the need for the station. The subsequent merging of the separate train operator companies meant that Holborn became an interchange with the central line, leaving the British Museum Station redundant; thus, the Station was closed in 1933. The station building was used as a military administration office until the 1960s when it fell into disuse. The building was demolished in 1989 to make way for the existing building on the site, which was developed in tandem with the subject site by Rolf Judd Architects.



Figure 9: British Museum station exit on High Holborn (no date, assumed to be pre-1930) (Source: Secrets of the London Underground)



Figure 10: 1940-1960 OS map. By this time British Museum Station had ceased, and the block occupied originally by Bloomsbury Market was partially developed into New Oxford House (now Chesterfield House), and the wedge-shaped block of 10 Bloomsbury Way further west had also been redeveloped. Further change is seen at the subject site, which is here occupied by No. 14 and Nos. 1-3 Bloomsbury Court. (source: National Library of Scotland: Reproduced with the permission of the National Library of Scotland)

When the London County Council unified the inner London boroughs, they discovered numerous duplicate street names. To solve this, they launched an extensive renaming programme, eliminating all duplicate names by 1935.

Silver Street, where the subject site is located, was one such duplicate; it was renamed Barter Street in 1937 to avoid confusion with another Silver Street in the City of London. Unfortunately, the remaining Silver Street located in the City was lost due to redevelopments after World War II. Even so, Barter Street was named to reference its proximity to the site of Bloomsbury Market and the market heritage of the area.

In the second half of the 20th century, the site's context saw the introduction of larger-scale development often occupying entire urban blocks, with varying degrees of success and impact, which often further disrupted the original fine urban grain and intimate character. One such example is the old Bloomsbury Market site (now Chesterfield House or LABS House), the concrete-clad 12-storey Holborn Tower (completed in 1960) immediately west of the subject site, the Post Office building, and the Travel Lodge tower, to name but a few.

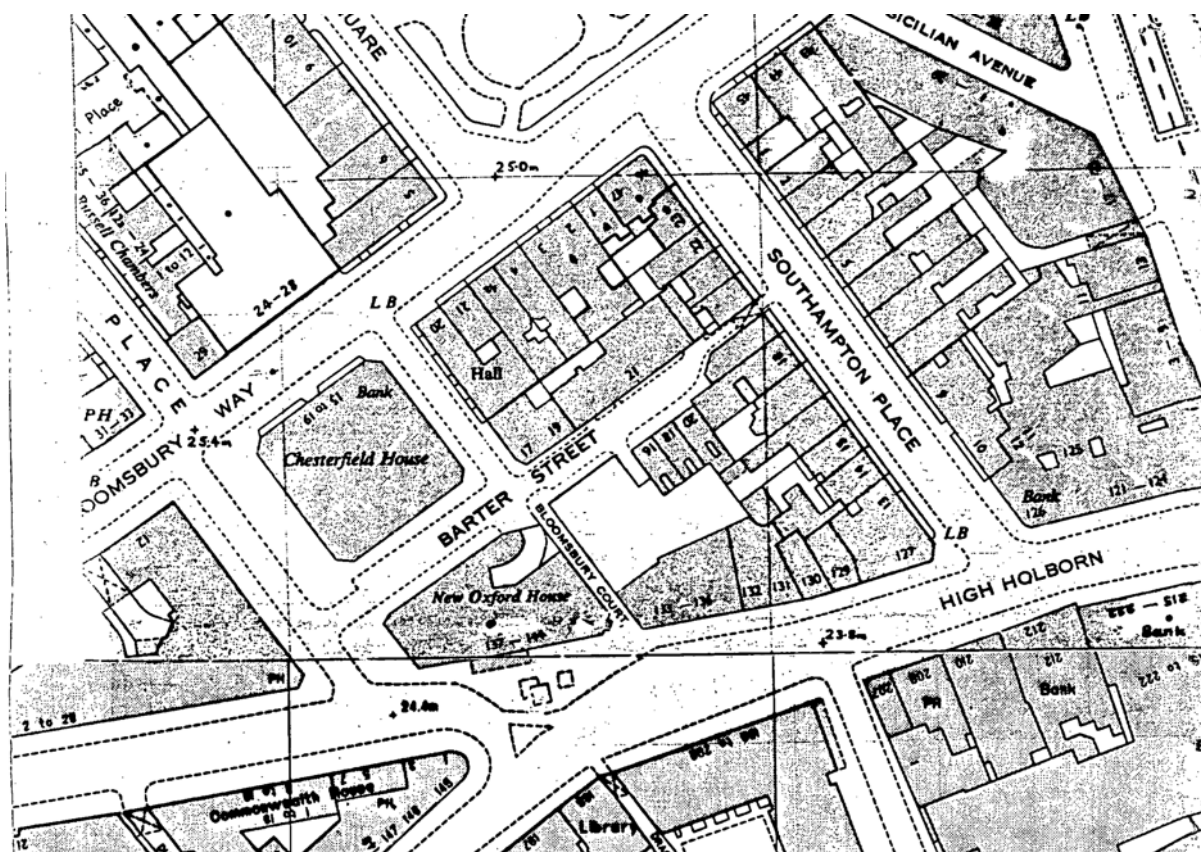


Figure 11: OS extract map from 1989 Planning Application, showing the subject site as vacant (14 Barter Street and 1-3 Bloomsbury Court demolished). Chesterfield House, New Oxford House (Holborn Tower) and 10 Bloomsbury Way are all shown as larger-scale redeveloped blocks. (source: Online Planning History)

3.2 History and Development of the Subject Site

1,	8 Moore Mrs. Clara, fried fish shop
o	Silver street, Bloomsbury
r	(W.C.), 2 Bury street, 19
	Southampton street.
	MAP L8.
	NORTH SIDE.
	1 & 3 Jones W. & Co. press makers
	7 Morris George, bootmaker
c	... here is Barter street...
	SOUTH SIDE.
	10 Parr George, saddler
	12 Presse Mrs. Emily, collar dresser
r	... here is Bloomsbury court
	14 Gillett John, army contractor
	14 Ramsden John & Co. merchants
	... here is Monarch yard...
	16 Claxton Chas. & Edwd. plumbers
f	18 Claridge James, bootmaker
	20 Evans Charles James, mathe-
	matical instrument maker
f	Hollebone W.J. & Sons, wine mers

Figure 12: Post Office Directory record from 1899 (source: University of Leicester)

Historic mapping in the previous section of this report demonstrates that the site has been developed since the early phase of Bloomsbury's growth from the 1660s onwards. The original building on the site was a modest mid-terraced house as part of Silver Street, probably with a ground-floor level shop, benefiting from local trade surrounding the neighbouring Bloomsbury Market. The original terrace was altered with the creation of Bloomsbury Court, creating two units on the site (known as No. 14), separate from the units on Bloomsbury Court (Nos. 1-3). No. 14 appears to have been in commercial/retail use (perhaps with associated accommodation), as indicated by the Post Office records which indicate that No. 14 provided an Army Contractor (owned by Mr John Gillett) and Merchants (owned by Mr John Ramsden).

In the early-mid 20th century, No. 14 formed a single unit, which became an Italian bakery known as Cossavella Brothers Ltd. This former building on the site likely originated from the Victorian period, with later alterations. It was constructed of stock brick with a stucco ground floor and dressings. Its styling was broadly Italianate, although a little clumsy, featuring a central Palladian-style window on the first floor and arched windows on the ground floor (Figure 15).



Figure 13: Aerial image from 1952 (source: Britain From Above). A triple pitch of the site's previous roof is visible. Chesterfield House is here half constructed – the second half probably pending the purchase of the terraces diagonally opposite the site. (source: Britain from above)

As detailed in the previous section of this report, the site's context evolved during the 20th century through the redevelopment of whole urban blocks with larger-scale development for housing and offices. Mid-20th-century Aerial photography captures this change in scale against the fine urban grain seen on the historic terraces of Southampton Place, Barter Street (Nos. 16-20) and around Bloomsbury Square. In the decades after these images were taken, further large development of Holborn Tower, 133-136 High Holborn, and to a degree, the subject site itself, further eroded the fine historic urban grain and intimate character of this pocket of Bloomsbury.



Figure 14: Aerial image from 1953. The roof and flank of the previous building on the site are visible. (source: Britain from above)



Figure 15: 1956 Photograph of 14 Barter Street, the previous building on the site, demolished circa 1960s. (Copyright: London Picture Archive)

As far as can be discerned from existing planning records and maps (see Figure 11), it is assumed that the site was demolished during the 1960s, although confirmation of the exact date has not yet been found. In 1972, a refused planning application was recorded for the use of the site (assumed to be vacant at the time) as a temporary car park. Subsequent planning records suggest that the site was purchased by the developer TP Bennet & Sons, who gained permission in 1975 for a new building of basement, ground and three storeys above, providing retail, office and residential uses. This permission does not appear to have been carried out but was renewed in 1982.

Subsequent planning records infer that the site was purchased in connection with the site of the previous British Museum Station building, disused since the 1960s. Whilst the council's planning records provide limited detail, it is clear that the scheme went through various amendments, two appeals (apparently for non-determination) and discharge of conditions between 1987 and 1990, with application reference 8800104 being approved and subsequently constructed (note – the drawings published on the council's website for this application appear to be superseded). Alongside the construction of the subject site, this scheme included the demolition and redevelopment of the previous station building on High Holborn, and the refurbishment of the listed terrace, Nos. 16-20A Barter Street). Relevant extracts from the discharged elevation details are below.



Figure 16: Approved Barter Street Elevation: discharge application 8900364 of approved application 8800104.

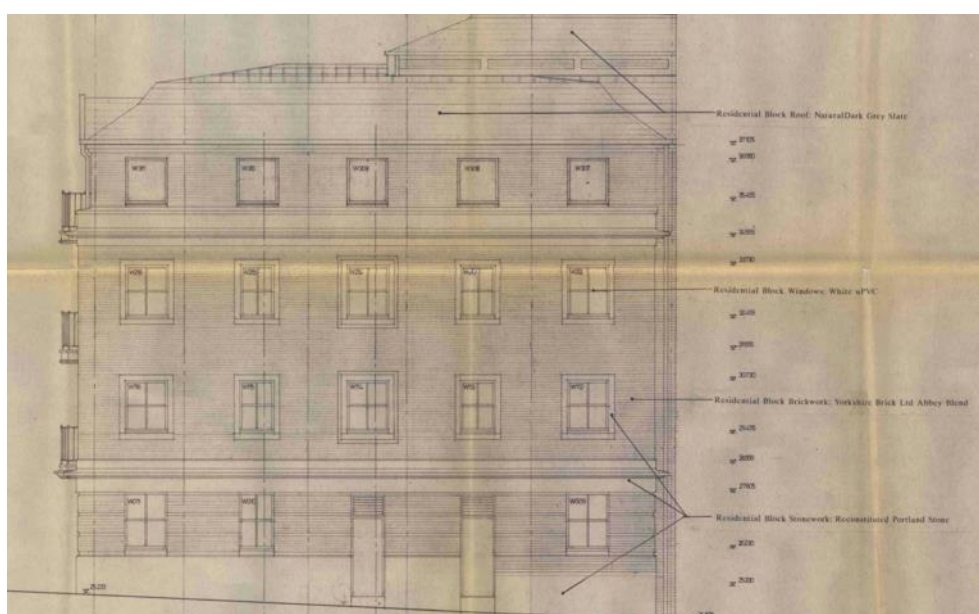


Figure 17: Approved Bloomsbury Court Elevation: application 8900364 of approved application 8800104.



Figure 18: The subject site

4 CHARACTER APPRAISAL OF THE AREA

Townscape Pattern: Bloomsbury is characterised by its gridded street pattern, interspersed with formal squares and green space with mature trees and vegetation. The area displays a hierarchy of streets with corresponding building scales and status, ranging from wide primary routes with intersecting streets to secondary lanes, rear mews, and smaller connecting alleys and passages. In the older, southern part of the Conservation Area, streets are generally narrower and more numerous, featuring intimate pockets and alleyways, often with a historical character. The subject site is one such example of an intimate secondary street with narrow connecting alleys and passages.

The area is dominated by finely-grained traditional terraces of townhouses; whilst most are residential, some have been converted to other retail, commercial and professional uses, sometimes retaining residential accommodation on the upper floors. The area is peppered with larger buildings reflecting the area's wide range of uses, as well as various modern developments including taller residential blocks and offices. In the Barter Street area, the more intimate scale and character have been better preserved to the east, with the western part of the area being heavily eroded through larger-scale redevelopment. The subject site, along with the opposite neighbour No. 17-19, forms an intermediate step or transition between this larger scaled, modern development to the west and the more intimate character to the east.

Building heights: Whilst the wider Bloomsbury area is dominated by terraces, often 3-4 storeys plus a mansard level, taller development is seen at the fringes of the Conservation Area and on primary vehicular routes. Of particular relevance to the subject site is High Holborn, which features a far taller established building height, including several tower blocks. Holborn Tower is 12 storeys, and the new Selkirk House development will be 19 storeys once constructed. Other larger urban blocks in the vicinity of the site are between 6-10 storeys (such as Chesterfield House, 10 Bloomsbury Way, Commonwealth House and 133-136 High Holborn). The buildings immediately surrounding the subject site are all taller, other than the listed terrace Nos. 16-20, which have retained their original 3 storeys.

Materials: Brick is the dominant building material in the Conservation Area due to its affordability and local availability, with earlier developments tending to feature red brick, transitioning to London stock around 1800. Stone is also used, particularly in churches, the British Museum, and other institutional buildings, while stucco appears from early 18th-century examples onwards, and was used more extensively by the 1820s. Glazed tiling, terracotta, and faience emerge in the late 19th century, notably in public houses and station buildings. Concrete was more commonly used in the Conservation Area's 20th-century buildings, as well as contemporary materials such as glass and steel. However, the area's 20th and 21st-century buildings exhibit a broad range of materials, including brick and/or stone facings and various modern and traditionally inspired cladding materials. Slate remains the dominant roof covering material, particularly for traditional buildings. Other roofing materials are present, especially on later building and roof extensions (such as metal cladding).

Detailing and Style: The area's development showcases shifts in architectural taste and fashions from the 17th to the 19th centuries, with a variety of uses, scales and styles. The area's numerous terraces of townhouses feature characteristic patterns of fenestration and classically inspired façade hierarchy. Windows typically consist of sliding timber sashes, but the design of doorways varies, featuring arched openings, timber porches, pediments, and occasional porticos. Elevation details include segmented heads, rubbed brick arches, stone banding, cast iron balconies, and intricate fanlights. Cast iron railings along frontages generally contribute to the area's character. Whilst the design of particular terraced groups or even streets may be reasonably consistent, there is much variety across the area, showcasing the various fashions from the Stuart period onwards.

Later developments from the 19th and 20th centuries exhibit eclectic styles with more ornamentation, drawing from various influences like Gothic, Italianate, and Arts and Crafts. Modern Movement influences are evident in the area's 20th-century buildings, although some projects adopt more traditional features and styles. Several of the larger modern buildings in the area (including larger-scale residential blocks, offices and towers) are somewhat devoid of character and quality; some offer a mediocre pastiche approach in an attempt to complement the area's character without making a true contribution themselves. The subject site is an example of this. Other modern developments are less sensitive, representing an alien and incongruous style, material and detailing (for example, Holborn Tower).

Roof forms: The terraces and smaller-medium scale buildings in the area often feature mansard roofs, whether traditional or a modern extension. Many buildings exhibit multiple layers of mansard, including several of the Grade II* listed buildings on Southampton Place, and the triple mansard on Chesterfield House. Overall, there is little consistency with roof forms, with several contemporary examples also present (such as at 10 Bloomsbury Way). A common feature regardless of roof form is a strong parapet, providing a clear, well-defined roofline. These are often accentuated through a contrasting moulded cornice in stucco or stone.

4.1 Relevant Neighbouring Buildings

To remain proportionate, the following neighbouring buildings have been included as the most relevant to this application, forming key parts of the site's wider setting. In some cases, the below buildings are of architectural and historic interest, being either statutorily listed or a positive contributor to the Conservation Area. These buildings represent local sensitive receptors and any future assessment of the proposed works will assess the potential impact on the setting of these buildings.

Conversely, some of these buildings are of no historic or architectural interest and may have an adverse impact on the character and appearance of the area. Some are also located just outside of the Bloomsbury Conservation Area but remain a visible part of the townscape and site's setting, thus making a valid contribution to the way that the area is experienced. As part of the established townscape, these buildings provide a design precedent and established context, against which the proposed design should be considered.

16,16A,18,18A,20 AND 20A Barter Street – This is the immediate neighbour to the east of the subject site. The terrace is grade II listed as a group, consisting of ground floor shops with residential accommodation above in stock brick and stucco. The group have retained its historic butterfly roof forms. The terrace dates from the early 19th century, replacing the original terrace on this site which dated from the Stuart period. As part of the same consent that approved the construction of the subject site in 1988 (application ref: 8800104), these buildings were extensively repaired and refurbished. The terrace makes a clear positive contribution to the character and appearance of the area.



Figure 19: 16,16A,18,18A,20 AND 20A Barter Street

21 Barter Street – This building is located diagonally opposite (northeast) of the subject site. The building is grade II listed, consisting of two generous storeys with slate mansard, faced in stucco in the Italianate style. The building dates from the mid-19th century and was originally used as a warehouse, but was converted to a training centre and more recently to residential flats. The mansard roof appears to have been replaced/extended in the 1970s as part of its conversion to a training centre. The building makes a clear positive contribution to the character and appearance of the area.



Figure 20: 21 Barter Street

Listed buildings on Southampton Place: There are two grade II* listed groups on Southampton Place: Nos. 1-8 (east side) and Nos. 14-22 (West side). The stuccoed rear of No. 19 is of particular relevance, due to its visibility from Barter Street and the fact that it contains the stucco arched passage between Barter Street and Southampton Place (included within the listing). The terraces date from c.1759-63, probably under the direction of Henry Flitcroft. All feature mansard roofs and several have an extended (double) mansard (Nos. 6, 7, 8, 14, 15 and 18). The terraces make a clear positive contribution to the character and appearance of the area.



Figure 21: Grade II* 1-8 Southampton Place



Figure 22: Rears of Grade II* 14-22 Southampton Place

No. 20 Bloomsbury Way and Swedenborg Hall, Barter Street: These buildings are located at the northern end of Barter Street, adjacent to Bloomsbury Way. The side elevation of 20 Bloomsbury Way is seen from Barter Street and is included in the grade II listing of Nos. 20-21 Bloomsbury Way, dating from 1760. Immediately neighbouring this is Swedenborg Hall on Barter Street, believed to date from the early 20th century. Whilst this building is not

identified as a Positive Contributor in the sub-area 6 Townscape appraisal map by LBC, this building is believed to make a positive contribution to the character and appearance of the Conservation Area. Both buildings are constructed in stock brick with stucco dressing and detailing with external cast iron railings at pavement level. No. 20 has retained a traditional roof profile, and Swedenborg Hall appears to have a modern flat roof. The site has previously been used as dwellings, as well as a brewery and warehouse. It was purchased by the Swedenborg Society in 1924, and it has since been used as their headquarters, as well as a museum, library and archive.



Figure 23: No. 20 Bloomsbury Way (grade II) and Swedenborg Hall

No. 17-19 Barter Street: This building is located directly opposite the subject site. It has been identified by the council as a positive contributor to the Conservation Area. However, it is considered that the building displays only limited historical or architectural interest, making this accolade somewhat tenuous – it is considered to make a neutral contribution at best. It is notably taller than the subject site with a tall flank wall that contrasts with lower listed No. 21. It was constructed in the 20th century and was previously known as Leather Trade House, (presumed commercial use, now converted to flats). However, the building is in keeping with the area's established scale and form, utilising red brick and stucco with a visible mansard roof with lead dormers.



Figure 24: 17-19 Barter Street



Figure 25: 17-19 Barter Street in the context of the site and listed neighbours. Note tall/dominant flank wall

Chesterfield House (LABS House): This building is located diagonally opposite (northwest) of the subject site. It is a 20th-century building constructed in two distinct phases, occupying the historic site of Bloomsbury Market. The building is an example of a larger-scale development of 6 storeys plus three levels of mansard plus an additional plant level (visible when stood further back, such as on New Oxford Street). The building's first phase of construction commenced in the late 1920s, completing only the northern half of the urban block (see photographs in Figure 13Figure 14, 1952). The second half (southern portion) of the scheme was constructed after the previous terraces on the site had been acquired in the late 1950s. The first half of the building was originally designed with two levels of mansard only. Online planning records are limited, suggesting that the third level of the mansard and the additional plant level were likely constructed alongside the late 1950s southern extension. Whilst it has not been identified on LBC's Bloomsbury Townscape Appraisal map as making a positive or a negative contribution, it is assumed that the council would consider this to be a neutral contributor. Whilst its materials and detailing do provide an appropriate response to the character of the area, its overlarge scale is jarring and overly dominant, eroding the intimate character of its immediate setting.



Figure 26: Chesterfield House, New Oxford St Figure 27: Chesterfield House from the front of the subject site

133-136 High Holborn: As previously mentioned, this building was developed to replace the previous British Museum Station in the late 1980s. It formed a part of a wider development scheme that included the redevelopment of the subject site and the refurbishment of listed Nos. 16-20 Barter Street. It is not identified in LBC's Bloomsbury Townscape Appraisal map (see Figure 3) as a positive or a negative contributor, and it is assumed that the council would consider it to be Neutral. That said, the building has not aged particularly well and its quality is mediocre. It is considerably taller than the subject site, accentuated by the large plant enclosure.



Figure 28: 133-136 on the right, High Holborn



Figure 29: 133-136 behind the subject site

Holborn Tower: This building is located to the west of the subject site and forms its immediate backdrop and context from several viewpoints. Oddly, LBC's Bloomsbury Townscape Appraisal map (see Figure 3) has not identified this building as a negative contributor. However, the description within the Bloomsbury Conservation Area Appraisal document (2011) quotes the following: *"Views to the south-west are dominated by the twelve-storey, concrete-clad Holborn Tower situated at No 137 High Holborn which was completed in 1960: it dominates long views and is out of keeping with the grain and scale of the sub-area"*. Therefore, it is considered to be a negative contributor to the Conservation Area, representing a wholly alien form of development in terms of scale, materials, proportions and detailing. Holborn Tower features a poorly designed recessed top storey, as well as smaller pop-ups and clutter (assumed to be plant enclosures and/or lift over-runs).



Figure 30: Holborn Tower behind the subject site



Figure 31: Holborn Tower, High Holborn

10 Bloomsbury Way (or the Bloomsbury Building) is located west of Holborn Tower and Chesterfield House, visible in channelled views westward along Barter Street. The building was originally built in 1947 following site clearance of the entire urban block as a result of WW2 bomb damage. It was originally constructed as the Headquarters of the Ministry of Defence and is now used as offices. It has been identified as a positive contributor to the Conservation Area. The building features a large glazed contemporary roof extension with associated roof terraces and other alterations, consented in 2012 (2012/1400/P). This modern roof extension can be glimpsed in several street-level views, albeit relatively recessive.



Figure 32: 10 Bloomsbury Way, High Holborn & New Oxford St



Figure 33: 10 Bloomsbury Way, from Barter Street

Selkirk House (Travelodge & NCP Car Park Site):

This site is located further west of the subject site and is outside of the Conservation Area. The site holds no architectural or historic interest and does not currently form part of the site's setting. However, full redevelopment of the site including a 19-storey tower has recently gained consent (Application reference 2023/2510/P). Unfortunately, the Heritage and Townscape Visual Impact Assessment did not include the impact on Barter Street, notably the arched passage to Southampton Place, from where the consented development may be visible. There is a strong potential that a building of this height will now form a part of the visible setting of the subject site.



Figure 34: Existing Travelodge tower, from Bloomsbury Way



Figure 35: Recent consented 19-storey tower on the site

The Post Office Building: Again, this building is not within the Conservation Area (Commonwealth House, which dates from the 1920s immediately to the east, is within the CA). However, it is another example of larger-scale modern redevelopment that has, in the past century, greatly changed the wider area's historic character and previously finer urban grain and intimate character. In reality, the boundaries of Conservation Areas are not immediately obvious or advertised; such development still contributes to the wider user experience of the area.



Figure 36: Post Office Building, High Holborn



Figure 37: Post Office Building and Commonwealth House

5 SIGNIFICANCE ASSESSMENT

5.1 Introduction

The NPPF, 2025 (Para 207) states that *“In determining applications local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should also be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on that significance.”* Significance is defined by Historic England as “The sum of the cultural and natural heritage values of a place, often set out in a statement of significance”. Understanding the significance of the heritage asset(s) can be achieved by disaggregating the key aspects of that significance into archaeological, architectural/artistic and historic interest. This is in line with the latest guidance by Historic England: Statements of Heritage Significance: Analysing Significance in Heritage Assets (October 2019).

5.2 Significance of the Subject Site

The site is within a tier 2 archaeological priority area (APA 2.11 London Suburbs). Tier 2 is the middle APA tier, indicating lesser significance and sensitivity than tier 1 areas. However, it is noted that the previous buildings on the site were fully redeveloped in the late 1980s, meaning that it is unlikely that any archaeological evidence survives. Therefore, the site’s archaeological interest is considered to be limited.

In terms of the site’s historical interest, this is also considered to be low. The site was constructed in the late 1980s as part of the redevelopment of 133-136 High Holborn. The architects at the time (Rolfe Judd) were a relatively large and successful practice, but not industry leaders or widely renowned. The building exhibits no surviving historic fabric and does not illustrate the original plot divisions, designs or uses of the previous buildings on this site. There is no known personage, events or patrons of note to lend additional interest through association.

Concerning the site’s architectural and artistic interest, the building’s design and appearance are merely average, displaying no particular architectural flair or aesthetic interest beyond the ordinary, and below the standard expected for a Conservation Area. The materials and scale are broadly in keeping with the area, but make no real contribution to the character, quality, and interest of the wider Conservation Area. The building attempts to express a sense of hierarchy, but the top (3rd floor) has been executed poorly with incoherent placement of poor-quality fenestration devoid of detail or interest. In an exaggerated attempt to make this floor appear subservient, the resulting proportions of the third floor are excessively squat. The primary façade and central “recessed” bay with balconies are asymmetrical, appearing off-balanced and likely the result of internal space and layout requirements rather than an intentional design feature. The building’s parapet and termination are weak, with a mean coping that gives almost no buffer to the lintels of the 3rd-floor windows, thus making the façade appear truncated and squat. This is exacerbated by the mean portions of the third floor generally. This is in stark contrast with the far more generous banding and cornices seen on the lower floors, again adding to the overall sense of imbalance and disproportion. An off-centre small triangular gable detail has been added to the parapet – a half-hearted attempt to assimilate a post-modern idiom without conviction. This accentuates the façade’s lack of symmetry, attention to detail, and quality, unbefitting of its Conservation Area context.

Overall, the building is considered to hold no heritage significance.

5.3 Contribution to the Conservation Area and the Setting of Listed Buildings

As previously mentioned, the site’s materials are broadly in keeping with the character and established materiality of the area. However, the brickwork, fenestration and detailing are of no great quality, so this contribution is limited. In terms of scale, the building provides a transition between the finer-grained, more intimate character of the surviving historic terraces and buildings to the east and the larger-scale modern developments immediately west. The council have not identified the site as making a positive or a negative contribution. Therefore, it is assumed that the council would consider the building to be “neutral”. This “neutral” accolade is somewhat flawed, as this would suggest it is merely achieving the “norm” of the Conservation Area. Instead, this building is below the average standard of building within the Conservation Area. There is certainly an opportunity for enhancement, especially given its immediate context for taller buildings, to which the site is somewhat diminished.

The building forms part of the setting of several listed buildings in the area. Most notably, the grade II listed terrace immediately east (Nos. 16, 16A, 18, 18A, 20 and 20A, Barter Street), the grade II listed building diagonally opposite (21 Barter Street) and the rears of grade II* terraces on Southampton Place (namely Nos. 14-22, with No. 19 being most relevant). For these buildings, the subject site makes, at best, a neutral contribution by responding generically to the area's materials, as well as being at a scale that mediates between the smaller-scale historic buildings in the east and the larger modern development to the west. However, the site lacks historical and architectural interest whilst its quality in materials, detailing and craftsmanship is mediocre at best. Overall, the building's contribution to the setting of these listed buildings is minimal and largely neutral, leaving the opportunity for enhancement. It is experienced in the immediate context of far taller and less characterful neighbouring buildings (e.g. Holborn Tower).

Whilst there are more listed buildings in the wider vicinity, the subject site has a lesser degree of influence over their settings. However, as with the aforementioned listed buildings, the subject site's contribution is neutral. More details on the significance and setting of neighbouring buildings are set out below.

5.4 Significance and Setting of the Immediate Neighbours

Neighbouring Building	Listing Grade/Level of contribution to the Conservation Area	Heritage Significance and Setting
Nos. 16, 16A, 18, 18A, 20 and 20A, Barter Street	Grade II Listed	Heritage Significance: Medium Setting: The setting is defined by the smaller, intimate character of Barter Street, adversely impacted and dominated by tall buildings (namely Holborn Tower, which forms the backdrop in several views) to the west. Other nearby listed buildings make a positive contribution to the setting. The subject site makes a limited (neutral) contribution, especially given it is experienced against the backdrop of Holborn Tower.
21 Barter Street	Grade II Listed	Heritage Significance: Medium Setting: As above
17-19 Barter Street	Identified by LBC as a positive building	Heritage Significance: Low – Medium Setting: As above, adding that this building is taller than the subject site and exhibits a more dominant relationship with its listed neighbour (No. 21)
Nos. 20 and 21 (and attached railings), Bloomsbury Way (Grade II)	Grade II Listed	Heritage Significance: Medium Setting: Defined by the relationship with Bloomsbury Square and the other buildings around the square. The subject site makes a limited (neutral) contribution to this setting.
Swedenborg Hall, Barter Street	Not identified by LBC – assessed to be a positive contributor	Heritage Significance: Low – Medium Setting: Defined by the ancillary relationship with no. 20, also influenced by the more intimate character of Barter Street. Adversely impacted by larger scale developments (Chesterfield

		House and Holborn Tower). The subject site makes a limited (neutral) contribution.
Nos. 14-22 and attached railings, Southampton Place (Grade II*). No 19 is of particular relevance.	Grade II* Listed	Heritage Significance: Medium – High Setting: Defined by the listed buildings on Southampton Place. No. 19 also has a strong relationship with Barter Street and the neighbouring listed buildings close to the arched passage. The setting is adversely impacted by tall buildings in westward views (namely Holborn Tower). The subject site makes a limited (neutral) contribution.
Nos. 1-8 and attached railings, Southampton Place (Grade II*)	Grade II* Listed	Heritage Significance: Medium – High Setting: Defined by the listed buildings on Southampton Place. The subject site makes a limited (neutral) contribution.
Holborn Tower	Not identified by LBC – assessed to be a negative contributor	Heritage Significance: None Setting: immediately neighbouring the subject site. This building is a dominant presence within the setting of nearby heritage assets and the wider Conservation Area and will form the backdrop against which the proposed works will be experienced.
Chesterfield House	Not identified by LBC – assessed to be a neutral-negative contributor	Heritage Significance: None Setting: Readily visible from the subject site, setting a clear precedent for large mansard roofs.
10 Bloomsbury Way	Identified by LBC as a positive building	Heritage Significance: Low – Medium Setting: Readily visible from the subject site, setting a precedent for contemporary roof extensions.
133-136 High Holborn	Not identified by LBC – assessed to be a neutral-negative contributor	Heritage Significance: None Setting: immediately neighbouring the subject site. This building is far taller than the subject site and will form the backdrop against which the proposed works will be experienced.

6 PROPOSALS & IMPACT

Please refer to the proposed drawings and Design and Access document provided by Rodic Davidson Architects (RDA) for more details on the proposed works. The proposal can be summarised as a two-storey upward extension, providing three residential units with private external amenity space. The new fourth floor will be an extension of the brick elevations below, whilst the new fifth floor will be a mansard, set back from the parapet. The mansard roof extension and dormers will be clad in zinc, and positioned to reflect the fenestration below. PV panels, a green roof and rooflights will also be provided. The existing interiors and facades of the building will not be altered, other than the removal of the small central “gable” decoration to the front parapet to facilitate the extension of the existing brickwork upwards. Internally, a new access stair will be added at the third-floor level.

6.1 Pre-Application Feedback and Design Development

Pre-application feedback was received under 2024/2531/PRE on 06.12.24 following two meetings and design development discussions with LBC. The following heritage and design-related comments have been summarised below, with the relevant response on how this advice has been implemented.

Officer comment (summarised version)	Response
The two-storey upward extension is acceptable given the scale and height of neighbouring buildings and the corner property's location. It also safeguards the setting of listed buildings on Barter Street, especially with the set back top floor mansard and retained three-storey set-back portion of the host building. The resulting massing won't feel out of character or clash with the surrounding context.	Noted
A single mansard on the additional storey is more appropriate than the double mansard options. The massing, scale, and form are acceptable, but further work is needed on the detailed design.	Noted - Further details have been provided as part of this full application submission, as per other comments.
Raising the existing roof parapet is positive, but the third and fourth floors appear unbalanced due to different floor-to-ceiling heights. Removing the capping may resolve this issue. If not possible, we can recommend reducing the fourth floor's height to match the third floor's or increasing the parapet further.	The proportions of the fourth floor have been adjusted to ensure it appears more subservient and balanced with the lower floors. This has been achieved by removing the existing uppermost cornice (third floor), extending matching brickwork upwards, and reinstating the cornice at a higher level. This rebalances the proportions of the third floor and minimises the perceived height of the new fourth floor. Standard internal floor-to-ceiling heights have been maintained.
The welcome introduction of the aluminium spandrel panel to prevent overheating is overshadowed by the large, dominating window openings. We recommend reducing the window reveal to match the window size and continuing the brick treatment, replacing the aluminium spandrel.	The aluminium spandrel panel has been removed, and window proportions reduced. Options for plain continuous brickwork under the window openings were tested; however, the brickwork appeared expansive and overly dominant. A shallow recess was added to the brickwork under the windows (apron panels) to provide articulation, interest, and visual relief whilst maintaining the overall appearance of brickwork, as per the officer's comments.
The top-floor windows on Barter Street don't match the rest of the building. They should follow the existing building's	Windows have been realigned to match the windows on the lower levels. As per the above comment, the width of window openings has been reduced. Full-height windows

rhythm, with smaller, more frequent windows. Also, they shouldn't be full-height windows to prevent overheating.	have not been included. At the mansard level, the lower half of dormer windows have been infilled with aluminium panels to reduce overheating whilst complementing the zinc roof.
The removal of the roof terrace and the glazed structure is welcome. They allow for a cleaner roof, which is important given the building's visibility in long views within the Conservation Area. Consider the location of plants to avoid public view, as visible plants are noted in Bloomsbury CAAMS as harmful.	No Plant is proposed at roof level.

6.2 Design Reasoning and Assessment of Impact

The below reasoning and assessment have been considered in light of the above assessment of significance, as well as an understanding of the site and area's history, development and existing character. As an unlisted building of no heritage significance dating from the late 1980s, only the potential impact on the character and appearance of the Conservation Area and the setting of nearby listed buildings will be assessed.

Fourth Floor Extension: The existing façade design lacks quality and rigour, which is particularly poor at the third-floor level where the proportions are squat and unbalanced with a weak termination/parapet (see assessment in section 5.2). As tested through design development and pre-application feedback, the proposed sheer extension of the existing brickwork to form the proposed fourth floor improves the proportions of the existing façade overall. This change, where the third-floor cornice is proposed to be reinstated at a slightly higher level, gives the 3rd-floor windows adequate breathing space and improved proportions, ensuring the newly proposed fourth floor remains subservient and well-balanced as part of the overall façade composition. This resolves the current squashed hierarchy of the façade.

The proposed new fourth-floor level is comfortably terminated by a new cornice and parapet; a detail inspired by many traditional buildings in the wider vicinity, as well as the established architecture of the existing building. Indeed, many buildings within the area feature strong, well-defined parapets with terminating cornices, as set out in section 4 of this report, and the council's "Bloomsbury Conservation Area Appraisal and Management Strategy" (2011) paragraph 3.17. As part of this extension, the small triangular gable feature would be lost, which is considered to be acceptable given its size and limited contribution to the existing design or the character of the area.

Overall, the sheer fourth-floor extension is considered to be contextually appropriate, offering an improvement to the existing building's hierarchy and proportions. This benefits the character of the Conservation Area whilst also providing much-needed high-quality housing.

Fifth Floor Extension and Roof: The proposed fifth-floor level is in the form of a mansard, as developed through pre-application feedback. Mansards are a common roof form seen throughout the wider area, as assessed in section 4 of this report. Therefore, this roof form is considered to be contextually appropriate. The mansard is set back from the fourth-floor brick parapet, which partly conceals it from ground-level views. This ensures the mansard appears as a recessive, subservient, and well-proportioned part of the building as a whole. Its subservient appearance is reinforced by the use of grey zinc cladding, which provides a contemporary yet visually recessive roofing material that will complement the established roof-level character of the Conservation Area whilst remaining subtly expressive of its contemporary design and construction. The dormers have also been detailed in zinc, remaining simple and minimal to provide a quietly contemporary aesthetic.

A slender black-painted metal balustrade has been provided on top of the fourth-floor parapet. This has been tested through pre-application discussions as the best way of ensuring safety for the fifth-floor amenity space, whilst also minimising the overall height of solid brickwork below. The mansard would be visible through the balustrade from ground-level views; however, this feature is considered to be contextually appropriate and would have no adverse impact on the character or appearance of the wider Conservation Area.

The roof features a green roof build-up, necessitating a flat surface rather than a pitched roof slope. PV panels, rooflights, and the lift overrun have also been provided at the roof level. These features offer clear sustainability benefits, as well as provide internal daylighting and accessibility requirements. They would not be visible from ground level as they are set back from the roof edge. These features would only be visible in private high-level views from the interior or roofs of nearby tall buildings, such as those from Holborn Tower. However, these are not public views and would have no impact on the character or appearance of the Conservation Area, nor the settings of nearby listed buildings. Regardless, the green roof is considered to be a positive enhancement of the roofspace generally.

Height and Mass: The height and mass of the proposal have been tested through pre-application discussions with the council, who have provided positive feedback that the current scheme's massing, scale, and height are appropriate. Whilst it is acknowledged that the proposed fourth and fifth-floor extensions increase roof level height and mass, this is read in the immediate context and backdrop of taller buildings, thus preventing the extension from encroaching on any townscape gaps or creating a sense of enclosure. The proposed scheme is often experienced in front of a backdrop of taller neighbouring buildings and, therefore, does not present a dominant form of development. From viewpoint 1 (see below) where there is no tall building in the backdrop, the proposed scheme remains well-proportioned and comfortable within the townscape. The proposed height sits comfortably between the opposite neighbour at 17-19 Barter Street and the taller neighbour at 133-136 High Holborn. The top of the proposed roof also remains lower than the top of the plantroom structure on 17-19 Barter Street opposite. Overall, the proposal relates well to the existing townscape, especially the height of No. 17-19 Barter Street opposite. This would form an appropriate buffer zone between the more heritage-sensitive townscape in the east and the taller buildings to the west.

In terms of the setting of neighbouring listed buildings, the height and mass of the proposed extension have been purposely set back from the listed terrace at Nos. 16-20A Barter Street; the site's closest neighbouring listed building. This creates a buffer zone that allows the proposal to remain respectful and appropriate to the setting of the nearby heritage assets, whose settings are already defined by the presence of taller buildings, such as Holborn Tower. As part of their pre-application feedback, the council commented that the proposed design would safeguard the setting of nearby listed buildings.

Fenestration: The proposed scheme has benefited from detailed discussions and feedback during the pre-application process. Given the poor quality and the more ad-hoc arrangement of fenestration on the existing building's 3rd floor, it is considered most appropriate to set out the proposed mansard fenestration based on the pattern of windows between the ground and 2nd-floor levels. This has inspired the proposed fenestration arrangement, ensuring a logical approach that aligns new fenestration above the lower-level windows. The style of the fenestration is intended to be contemporary, simple, and clean whilst remaining appropriate to the wider setting. The size of window openings has been reduced as part of the pre-application process, protecting the building from overheating and ensuring the proportion of fenestration is aligned with the overall façade hierarchy.

In terms of detailing, white powder-coated aluminium frames are proposed, which will provide a slender, high-quality appearance whilst complementing the lower-level window frames on the existing façade. At the mansard level, the openings feature lower-level metal spandrel panels as a way of reducing overheating whilst allowing a visually consistent approach that allows certain openings to operate as doors. At the fourth floor level, a small recess apron panel has been included under each window. Various options have been tested as part of the pre-application process, and it is considered that the subtle articulation and visual relief provided by the brick aprons provide a more visually pleasing and interesting approach whilst providing solid brickwork to reduce the opening dimensions and potential overheating.

Materials: The fourth-floor extension is proposed to be constructed in brick to match the existing elevation as closely as possible. The proposed fifth-floor mansard is to be clad in grey zinc, providing a contemporary yet harmonising response to the traditional roofscape of the wider Conservation Area. As previously mentioned, windows will consist of slender, high-quality aluminium frames in a white powder-coated finish to reflect the white window frames on the existing building. The roof will feature a green roof build-up and PV panels (not publicly visible). The balustrade to the fifth floor consists of simple black painted metal railings as a contemporary interpretation of traditional ironwork in the wider Conservation Area.

6.3 Visual Impact Assessment

The following section provides a visual impact assessment of the Proposed Development. The below viewpoints have been selected and agreed upon with the council through the pre-application process to assess the proposed scheme from various public vantage points. Viewpoint locations have been informed by site investigations, mapping studies, and the council's own key views map. The subject site does not form part of the identified key views within the Bloomsbury Conservation Area Appraisal (2011) document.

The selected views seek to capture the relationship with nearby heritage assets to assess the impact on their settings, as well as on the character and appearance of the wider Conservation Area. A full Townscape Visual Impact Assessment (TVIA) methodology was not required as part of this submission and assessment. However, the below assessment of verified views provides a similar objective assessment.

The four viewpoints were professionally photographed and surveyed, and Accurate Visual Representations (AVRs) have been produced for each view. This work has been undertaken by OceanAVR. A detailed methodology for the preparation of these views is included within the accompanying OceanAVR Report, which also includes full-resolution images for reference.

For each of the views, there are images of the view “as existing” and “as proposed”. For each of the identified views, a description and assessment are given for:

- The view as existing, identifying its key features (positive and negative), heritage assets and its overall value and sensitivity
- The view as proposed, with an assessment of the likely impact that the proposed development could have on the view. This includes any impact on the relevant heritage assets within the view.



Figure 38: Viewpoints location map

6.3.1 Viewpoint 1

As existing: This viewpoint is taken from the junction of Bury Place, looking east along Barter Street toward the subject site. The corner of Chesterfield House (Labs House) is visible on the left, and the base of Holborn Tower is visible on the right. In terms of visible heritage assets within this view, the grade II terrace (Nos. 16-20A Barter Street) and the rear elevation of the II* listed terrace on Southampton Place are just visible beyond the subject site. The positive contributor (17-19 Barter Street) is seen in the middle left. The view is within the Bloomsbury Conservation Area.

In terms of negative features, the unattractive and low-quality rear elevation of 133-136 High Holborn looms over the subject site, seen just beyond Holborn Tower. Holborn Tower frames this view immediately to the right, presenting a negative/detracting feature. The full height of the tower is not captured in this view, as the standard photography lens angle is not wide enough to show the extent of the tower's height from this close range. However, in reality, the tower is a dominant presence in this view. The additional plant room roof structure on the subject site is visible in this view, adding a sense of roof-level clutter. Chesterfield House makes a more neutral contribution to the view.

Overall, the value and sensitivity of the view is medium. Despite the aforementioned visible heritage assets, these are not the focus of the view, and the dominating, detracting presence of Holborn Tower erodes the value overall and sensitivity to change.

As proposed: The scheme responds to the height of 133-136 High Holborn, effectively concealing its unattractive and blank rear elevation. This addition enhances the visual interest of the view and reduces the prominence of this previously detracting feature. The mass and scale of the proposed extension appear comfortable within its setting, creating a visual relationship with No. 17-19 Barter Street opposite, further reinforced by both buildings being constructed of red brickwork with grey roof coverings. This channels the view toward the heritage assets without reducing their prominence or visibility; the proposed development does not detract from their appreciation in the context of neighbouring taller buildings. Instead, the proposed development helps to form a clearer buffer zone between the lower, more heritage-sensitive townscape in the background, and the taller, modern buildings in the foreground. The scheme mediates well between the listed terraces in the centre distance of the view, Holborn Tower to the right, and 133-136 High Holborn behind the site. No roof structures are visible above the mansard, providing a reduction in roof-level clutter when compared with the existing view.



Figure 39: View 1 – as existing



Figure 40: View 1 – as proposed

6.3.2 Viewpoint 2

As existing: This viewpoint is representative of the potential impact on the settings of heritage assets to the northwest of the site, including the setting of grade II listed 20-21 Bloomsbury Way (not visible in the view). The side elevation of positive contributor 17-19 Barter Street is visible second on the left of the view, and the very edge of Swedenborg Hall (also a positive contributor) is visible on the far left of the view. The view is within the Bloomsbury Conservation Area.

Holborn Tower is a clear detracting feature within this view, framing it on the right-hand side. The tower is of low townscape quality, alien in character and materials to the Bloomsbury Conservation Area. In the centre of the view above the subject site, the unattractive and windowless rear elevation of 133-136 High Holborn is visible, forming another detracting townscape feature. The buildings on the opposite side of High Holborn are visible in the townscape gap between these two detracting features. The site makes a neutral contribution to this view, offering no great architectural quality or townscape merit. Its squat proportions appear unresolved and underwhelming, and it appears somewhat dwarfed by the surrounding townscape.

Overall, the value and sensitivity of the view is medium-low, given the lack of designated heritage assets within the view and the dominant, detracting features such as Holborn Tower.

As proposed: The proposed development would sit in front of the blank, unattractive rear elevations of 133-136 High Holborn, thus resulting in no additional enclosure or perceived bulk within this view. The proposed fourth-floor extension and mansard roof are not prominent features in this view but instead, present a logical continuation of the established townscape defined by No. 17-19 Barter Street by maintaining similar building heights and materials. This rationalises the existing townscape, channelling the eye towards the townscape gap and glimpses of High Holborn beyond. There is no impact on the settings of heritage assets in this view. The proposed extension appears as a comfortable and logical addition. The quietly contemporary style of the proposed extension is perceptible in this view, inspired by the existing architectural language and materials of the lower floors of the building.



Figure 41: View 2 – as existing



Figure 42: View 2 – as proposed

6.3.1 Viewpoint 3

As existing: This view is representative of the potential impact on the settings of several nearby listed buildings, including Nos. 16-20A Barter Street (visible to the left of the site), No. 21 Barter Street (visible opposite the aforementioned terrace) and the western (rear) elevations of grade II* listed Southampton Place, namely no. 19 and the arched passage from which the view has been taken. The view is within the Bloomsbury Conservation Area.

Holborn Tower is a clear detracting feature within this view, dominating the middle distance with its bulk and height that is at odds with the majority of built form within the Bloomsbury Conservation Area. Its detailing and materials are also of poor quality and do not relate well to the heritage-sensitive surroundings. The site makes a neutral contribution to this view, offering no great architectural quality or townscape merit. It is taller than the neighbouring listed terrace, but its squat proportions appear unresolved and underwhelming.

On balance, the value and sensitivity of the view is medium, given the presence of heritage assets within the view and its wider setting. However, Holborn Tower forms a dominating and detracting backdrop that cannot be overlooked.

As proposed: The proposed scheme is confined within the backdrop of Holborn Tower, thus resulting in no additional enclosure or perceived bulk. The proposed fifth-floor mansard provides a logical stepping, and its form and materials ensure it remains a recessive feature in this view. Whilst the height of the subject site would increase in relation to the listed terrace Nos. 16-20A, this is perceived in the context of Holborn Tower and it does not alter or diminish the appreciation of the heritage assets. The improved building proportions and proposed cornices are visible in this view, which relate well to the strong cornices at No. 16-20A Barter Street. This also provides visual articulation and breaks up the massing.



Figure 43: View 3 – as existing



Figure 44: View 3 – as proposed

6.3.1 Viewpoint 4

As existing: This viewpoint is representative of glimpsed and channelled views from busy High Holborn, with Holborn Tower and 133-136 High Holborn channelling the view into Barter Street with oblique glimpses of the flank of the subject site. Beyond this, the uppermost corner of No. 17-19 Barter Street (identified positive contributor) is visible in the gap. No listed buildings are visible in this view.

Holborn Tower is a clear detracting feature within this view, dominating the left foreground with its bulk and height that is at odds with the majority of built form within the Bloomsbury Conservation Area. Its detailing and materials are also of poor quality and do not relate well to the heritage-sensitive surroundings. As with View 1, the camera lens angle does not demonstrate the full height of the tower; however, in reality, this is a tall and dominating feature that looms over the viewer. The subject site makes a limited contribution to the character and interest of this view, given the small part of the building that is visible. No. 17-19 Barter Street is visible beyond, appearing noticeably taller than the subject site.

On balance, the value and sensitivity of the view is low, given the dominating feature of Holborn Tower and the busy, more commercialised character of High Holborn, which generally features taller buildings.

As proposed: The proposed extension would be visible in this view, adding slightly to the visible mass of the subject site within the townscape gap. However, it remains substantially smaller than 133-136 High Holborn, forming a logical continuation of the townscape between this building and Nos. 17-19 Barter Street beyond. The prominence of the townscape gap is maintained by the proposed scheme and does not meaningfully change the character of this view from High Holborn. The appropriate materials and design of the proposed extension with cornice and horizontal banding help to break up the mass, relating well to the existing building and neighbouring No. 133-136, whilst also drawing the eye to the gap. There is no impact on listed buildings in this view.



Figure 45: View 4 – as existing



Figure 46: View 4 – as proposed

6.4 Summary of Impact and Public Benefits

In terms of the overall planning balance and the requirements of the NPPF, the above assessment has found no instances of less than substantial harm. This is confirmed by the assessment of verified views, which demonstrates the realistic townscape impact of the proposed works. Whilst the proposed fourth and fifth-floor extension would be visible, visibility alone does not necessarily equate to harm. Indeed, the proposed changes would resolve and improve the existing ill-conceived proportions and façade hierarchy of this 1980s building. The proposed extensions would fit harmoniously within the established townscape (which includes tall buildings nearby) and safeguard the settings of nearby listed buildings through appropriate massing, scale, and adequate setbacks to ensure a subservient and appropriate form of development. Appropriate use of matching materials and design features such as cornices and horizontal banding are influenced by the existing building and its context, helping to break up the mass and reinforce the building's hierarchy.

Overall, the proposal is considered to meet the requirements of the NPPF (2025). Should the council consider that a degree of harm is caused by the proposed scheme, this could only be at the lowest end of the spectrum of "less than substantial harm" and would be suitably outweighed by the public benefits of the scheme, as required by paragraph 215 of the NPPF (2025).

The public and heritage benefits of the scheme are summarised as follows:

- Enhancement of the existing building's design, hierarchy and proportions through resolving the current unsatisfactory weak termination and the poor quality, meanly proportioned third-floor. The works would give the third-floor windows much-needed breathing space and improved proportions generally, allowing for better balance with the proposed fourth floor. This enhancement would benefit the wider Conservation Area, providing a better quality corner building that relates well to the surrounding townscape.
- Provision of three new residential units, making a contribution to the council's housing targets and providing much-needed high-quality housing in the area.
- Improvements to the sustainability and energy efficiency of the site through the following measures:
 - Greatly improved thermal insulation standards of the fourth and fifth floors, which would also benefit the insulative properties of the third floor below.
 - Sustainable energy generation through PV panels.
 - Provision of green roofs.
 - The provision of energy-efficient internal ASHPs
- Improvement of the overall fire safety of the building through introducing new fire safety measures.

7 HERITAGE POLICY CONSIDERATIONS

The assessment in this document was carried out in consideration of up-to-date national and local policy, including:

- Planning (Listed Buildings and Conservation Areas) Act 1990
- National Planning Policy Framework (NPPF) (2025)
- National Planning Policy Guidance (PPG) "The Historic Environment" (2019)
- Conservation principles, policies and guidance for the sustainable management of the historic environment, English Heritage, April 2008
- Good Practice Advice in Planning, Historic England (GPAs): Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (March 2015) and Planning Note 3: The Setting of Heritage Assets (December 2017)
- Historic England Advice Notes (HEANs) Note 1 - Conservation Area Appraisal, Designation and Management (February 2019) and Note 12 - Statements of Heritage Significance: Analysing Significance in Heritage Assets (October 2019)
- The London Plan (March 2021)
- Camden Local Plan 2017
- Camden Planning Guidance: Design (2021)
- Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

The following key policy extracts are considered particularly relevant to the heritage matters of this scheme and have been copied below with responses to their requirements. To avoid repetition and to remain proportionate, the below does not include every relevant policy but rather seeks to provide a general overview of the heritage policy landscape.

7.1 National Planning Policy Framework (NPPF) (February 2025)

Para 207: 'In determining applications local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should also be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on that significance'.

Para 215: "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

Para 216: "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

Para 219: "Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."

Response to NPPF: The proposal complies with the criteria outlined in the NPPF, thoroughly assessing the relevant heritage assets and demonstrating a clear understanding of their significance. The evaluation concludes that the proposals will not harm the significance of the site, the Conservation Area, or the settings of nearby listed buildings. Regarding the Conservation Area (a designated heritage asset), this assessment has carefully examined its history, character, and significance. The site makes a neutral contribution to the Conservation Area, but it has been identified as being of no great quality with several opportunities for improvement. The proposed changes seek to improve the design and character of the site and thus the wider Conservation Area by improving the building's proportions and forming a better relationship with its taller neighbours, whilst safeguarding the setting of the nearby listed buildings. The proposed development leaves a clear "buffer zone" between the extended new

floors and the listed neighbouring terraces. This setback ensures the proposed extensions would not be overbearing to the setting of the listed buildings; a setting that is already defined by the nearby tall buildings.

This assessment, which has been aided by verified views, identifies no harm to the relevant heritage assets. Therefore, there is no requirement to provide balancing heritage benefits under paragraph 215 of the NPPF (2025). However, the scheme delivers several heritage and broader public benefits, as detailed in Section 6.4 of this report.

7.2 London Borough of Camden Local Plan (2017)

D1 – Design: This policy emphasizes the importance of high-quality design in development. The key intentions include:

- Respecting local character and preserving heritage assets.
- Ensuring sustainability in construction, resource use, and climate adaptation.
- Using high-quality, durable materials that complement the surroundings.
- Enhancing connectivity with well-integrated streets and open spaces.
- Promoting inclusivity, accessibility, and public health in design.
- Ensuring safety and security by minimizing crime and antisocial behaviour.
- Preserving natural features, open spaces, and strategic views.
- Incorporating landscaping and greening opportunities.
- Providing high-quality housing and outdoor amenity space.
- Thoughtfully integrating building services and infrastructure.

The Council will resist poor design that fails to enhance the character, quality, and functionality of an area.

D2 – Heritage: This policy focuses on preserving and enhancing Camden's heritage assets while balancing development needs. Key principles include:

- Protecting Designated heritage assets, only permitting the loss or substantial harm to a designated heritage asset if substantial public benefits outweigh the harm or if no viable conservation options exist.
- Assessing proposals that cause less than substantial harm by weighing public benefits against the impact.
- Ensuring new development preserves or enhances a Conservation Area's character.
- Resisting demolition of unlisted buildings that contribute positively to a Conservation Area.
- Preventing harmful development outside Conservation Areas that affects their character.
- Protecting trees and garden spaces that add to the Conservation Area's character.
- Resisting demolition of listed buildings.
- Preventing harmful alterations, extensions, or changes of use.
- Protecting the setting of listed buildings from harmful development.
- Safeguarding non-designated heritage assets, weighing their significance against public benefits.

Response Camden Local Plan policies: The requirements of these policies have been fulfilled by the proposed scheme, which has been developed in close collaboration with LBC through the pre-application process. Whilst the proposed fourth and fifth-floor extension would be visible, visibility alone does not necessarily equate to harm. Indeed, the proposed changes would resolve and improve the existing ill-conceived proportions and façade hierarchy of this 1980s building. The proposed extensions would fit harmoniously within the established townscape (which includes tall buildings nearby) and safeguard the settings of nearby listed buildings through appropriate massing, scale, and adequate setbacks to ensure a subservient and appropriate form of development. The proposed extension relates well to the existing townscape, especially the height and materials of No. 17-19 Barter Street opposite. This would form an appropriate buffer zone between the more heritage-sensitive townscape in the east and the taller buildings to the west. Overall, the proposed scheme would preserve the character and appearance of the Bloomsbury Conservation Area. Despite the lack of "harm" and the ensuing policy requirements for balancing benefits, this scheme provides several public and heritage benefits regardless. These include new high-quality housing, improved energy efficiency and sustainability enhancements.

8 CONCLUSION

Historic England's "Conservation Principles" and the NPPF (2025) define conservation as "managing change". Buildings, designated or undesignated, are dynamic environments that have been subject to change and will continue to change to remain sustainable, welcoming and pleasing places. The site and the wider Conservation Area are not static places.

The proposals have been based on a thorough understanding of the subject site and the wider area in terms of the prevailing architectural style and historical development. AndHeritage has undertaken detailed research into the history of the building and area to understand its character and significance, thus informing the design development of this scheme. As an unlisted building of no heritage significance dating from the late 1980s, only the potential impact on the character and appearance of the Conservation Area and the setting of nearby listed buildings has been assessed. The established townscape context of the subject site must also be taken into consideration when assessing any impact, as demonstrated in the selected viewpoints. This includes the presence of several taller neighbouring buildings, including Holborn Tower.

In terms of the overall planning balance and the requirements of the NPPF (2025), the assessment has found no instances of harm. This is confirmed by the assessment of verified views, which demonstrate the realistic impact of the proposed works on the surrounding townscape. While the proposed fourth and fifth-floor extensions would be visible, visibility alone does not necessarily imply harm. The proposed changes would rectify and enhance the existing ill-conceived proportions and façade hierarchy of this 1980s building. The proposed extensions would blend harmoniously within the established townscape, which includes tall buildings nearby, successfully mediating between the lower and more heritage-sensitive townscape to the east, and the taller, modern townscape to the west. Additionally, they would safeguard the settings of nearby listed buildings through appropriate massing, scale, and adequate setbacks to ensure a subservient and appropriate form of development. Overall, the proposed scheme is considered to preserve the character and appearance of the Bloomsbury Conservation Area and the settings of nearby listed buildings.

This assessment is considered to meet the requirements of national and local planning policy and guidance. If the council determines that the proposed scheme causes a degree of harm, this could only be at the lowest end of the spectrum of "less than substantial harm." This would be adequately outweighed by the aforementioned benefits of the scheme, as required by paragraph 215 of the NPPF (2025).

Overall, it is considered that the impact of the proposed works would not harm and would rather assist in the long-term use and appreciation of the relevant heritage assets. It is therefore concluded that the proposed works satisfy the relevant clauses of the NPPF. These are consistent with the spirit of local policies and national conservation principles.

9 APPENDIX

9.1 Research Resources & Notes

In addition to the relevant planning guidance and policy documents listed in this report, the following resources have been used to inform various sections on History and Development, and thus inform the assessment of Significance:

- Layers of London Mapping [<https://layersoflondon.humap.site>]
- MOLA Archaeology Map [<https://www.mola.org.uk>]
- "The Buildings of England: London 4: North" by Cherry and Pevsner
- London Picture Archive
- Post Office Directory Records
- Survey of London (British History Online)
- Bloomsbury Conservation Area Appraisal and Management Strategy (London Borough of Camden, 2011)
- London Transport Museum website

Report Limitations

This report has been conducted primarily as a desk-based study and has utilised information derived from a variety of online sources, only some of which have been directly examined for the purpose of this assessment. The assumption is made that this data, as well as that derived from secondary sources, is reasonably accurate.