

# HANDFORTH

## HERITAGE

11 Doughty Street, Camden  
Heritage Impact Assessment

---

March 2025

**Contents**

1.	Introduction	3
2.	Historic Development	4
3.	Identification of Heritage Assets and Significance Assessment	10
4.	Proposals and Assessment of Impact	24
	Appendix 1: Legislation, Planning Policy and Guidance	26



# 1. Introduction

This Heritage Impact Assessment ('report') has been produced by Handforth Heritage to accompany full planning and listed building consent applications relating to the proposed change of use from office to residential to No. 11 Doughty Street ('the site'), which is grade II listed and located within the Bloomsbury Conservation Area, and the associated physical works necessary to facilitate its reinstatement to residential use.

The report has been produced to identify and assess the significance of any Heritage Assets that may be potentially affected by the proposals and then to determine the potential impact of the scheme on this. This report has been undertaken in accordance with Historic England's guidance on heritage assessments, namely Statement of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12 and Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (GPA 3). The legislation and policy framework applicable to this application is set out at Appendix 1.

This report should be read in conjunction with the application drawings and Design and Access statement prepared by Trehearne Architects.

All images are orientated north unless otherwise stated.



Figure 1 Site location plan, showing site in red.

## 2. Historic Development

The site is located within the Bloomsbury Conservation Area which covers approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and from Tottenham Court Road in the west to King's Cross Road in the east. The area is widely considered to be an internationally significant example of town planning. The original street layouts, which employed the concept of formal landscaped squares and an interrelated grid of streets to create an attractive residential environment, remain a dominant characteristic of the area. Its expansion northwards from *circa* 1660 to 1840 led to a consistency in the street pattern, spatial character and building forms despite its size and varying ownerships.

The earliest map consulted dates to 1746, here the site has yet to be developed, and the area still has a rural appearance albeit development can be seen to the south and east. The site formed part of the Doughty Estate which was linked with the Foundling Estate and settled by Sir Edward Doughty, who owned land in Buckinghamshire, Suffolk, Lincolnshire and Dorset. Its boundaries followed the old parish boundary on the south, Gray's Inn Road on the east and adjoined the Foundling Estate, west and north. In 1792 Henry Doughty granted leases to Joseph Wigg, carpenter, and George Slaton, builder, to erect six houses on each side of the street southwards from Guilford Street. In 1799–1800 building leases were granted for the completion of the south part of the west side of the street. The south part of the east side of the street was completed between 1807–09 and the northern end, which lies in the Foundling Estate, was completed by 1810. The extent of the development can be seen on the 1828 Greenwood map.

The Census provides a useful indication for how the property was used historically. The 1841 record identifies four members of the Spencer family living on the site along with four servants. The 1871 OS map provides an early detailed view of the area. Here it is clear that all the terraces have been built in a relatively regular pattern with closet wings to rear. The map shows a small lightwell to the rear of the building, a feature that is prevalent on most buildings within the street.



Figure 2 1746 Rocque map showing the site prior to its development. Note urban sprawl to the south.

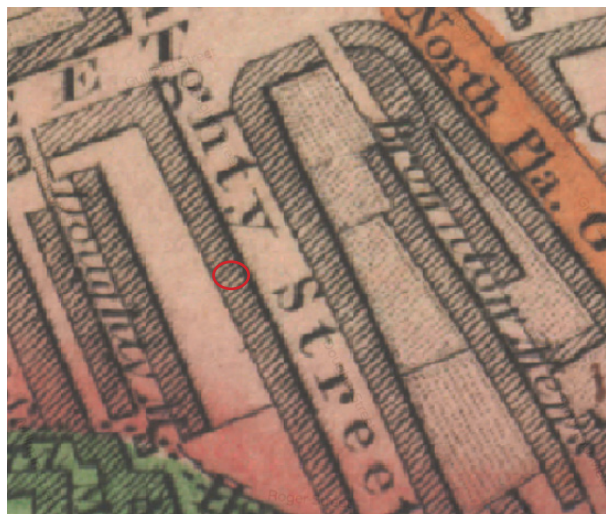


Figure 3 1828 Greenwood map showing early cartographic evidence for the site and surroundings.



Figure 4 1871 OS map showing the site and surroundings in greater detail.

## 2. Historic Development

The 1894 and 1951 OS maps show no changes to the footprint of the site. In the wider area the original form of the majority of buildings is still largely legible with only small changes visible to properties, largely to the rear. The 1951 map shows the mews buildings to the rear individually numbered suggesting they may have been physically separated from the principal dwellings at this point.



Figure 5 1894 OS map showing no change to the footprint of the site.



Figure 6 1951 OS map showing no change to the footprint of the site.



## 2. Historic Development

In addition to cartographic evidence, there are a number of historic plans available at Camden Archives and the council's website that help inform an understanding of the evolution of the building. 1969 plans at the Archive show that the building was completely rewired with new plumbing and central heating installed. As part of this application a large rear extension was proposed. These plans are shown over the next few pages. The extension here does not appear to have been constructed, as a separate set of plans produced the same year, available on the council's website relating to a permitted application (ref: 7893(R)), show a similar scheme but with a smaller extension proposed at ground floor.

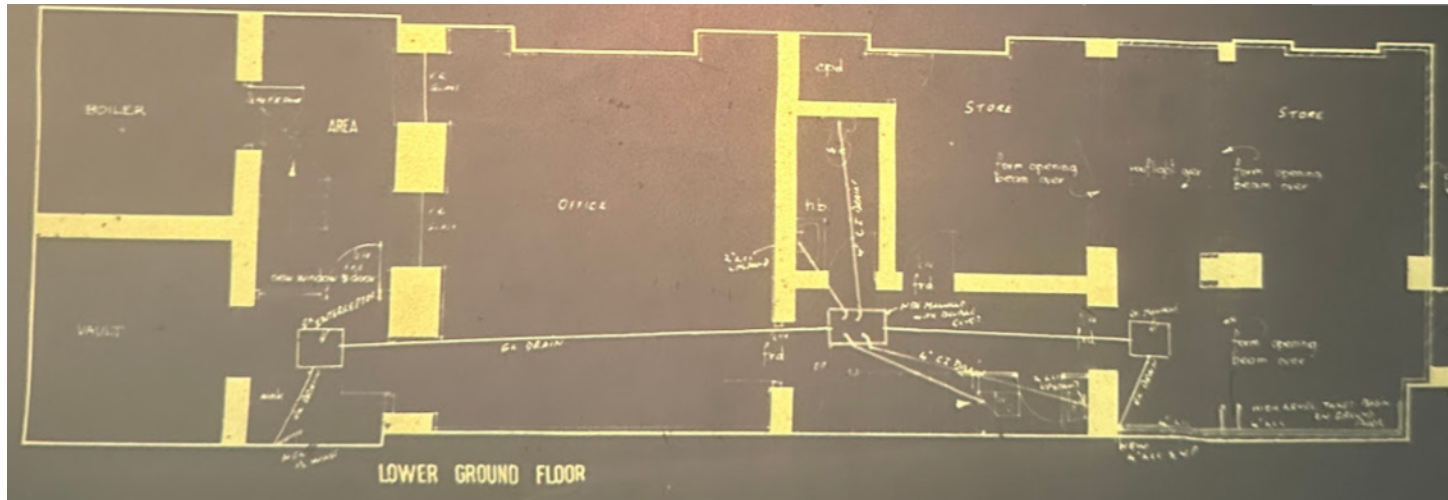


Figure 7 1969 Lower Ground Floor Plan.

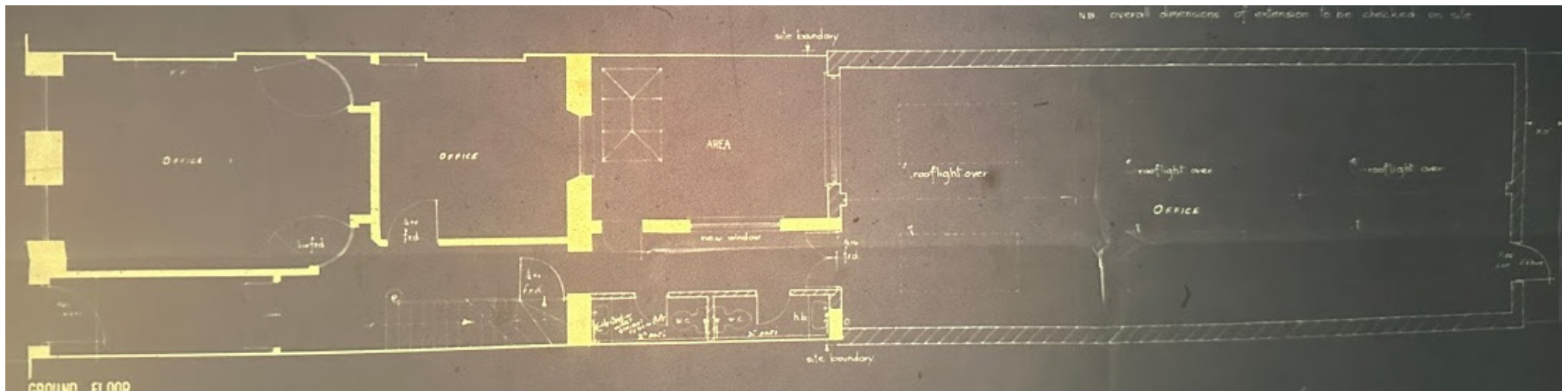


Figure 8 1969 Ground Floor Plan.

2. Historic Development



Figure 9 1969 plans showing first floor (bottom) and second floor (top).

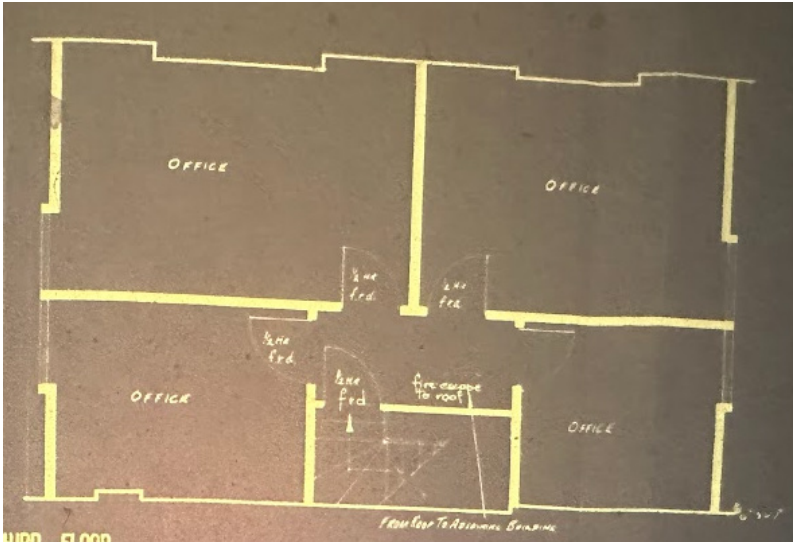


Figure 10 1969 3rd floor plan.

## 2. Historic Development

The council's website includes a series of applications which include drawings that are helpful in charting the evolution of the building. Those considered to be of relevance and that were consented are outlined below with drawings following:

1. Ref: 8670176, 10 & 11 Doughty Street, *Formation of a link through the party wall at basement level* Decided 12-05-1986
2. Ref: 8870177, 11 Doughty Street, *Erection of second floor addition to rear extension removal of partitions in rear addition and construction of glazed roof over ground floor courtyard and reinstatement of glazing bars to rear windows* Decided 30-09-1988
3. Ref: LS9904310, 10 & 11 Doughty Street, *Formation of new openings in party wall* Decided 22-04-1999

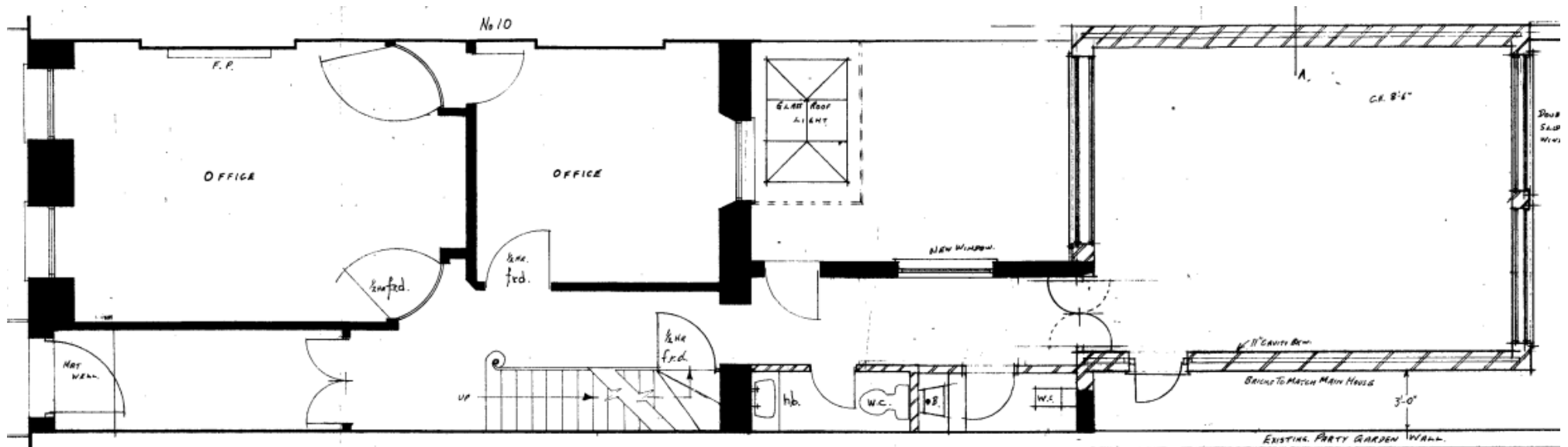


Figure 11 1969 Ground floor consented plan (ref: 7893(R)) showing the extension that was constructed.



## 2. Historic Development



Figure 12 1988 permission (ref: 8870177) showing existing rear elevation with later two over two sashes and dormer windows.

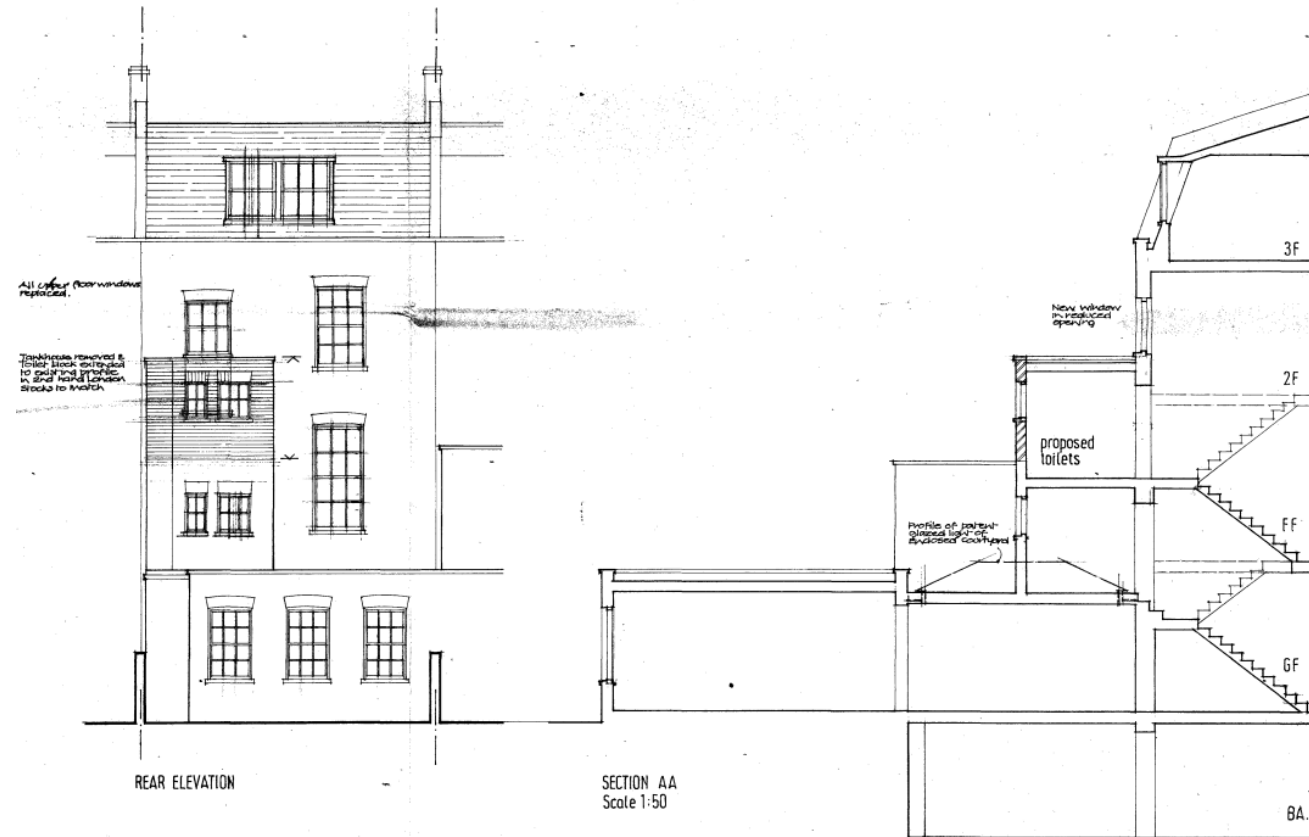


Figure 13 1988 permission (ref: 8870177) showing rear closet wing extension and infilling of court yard.

### 3. Identification of Heritage Assets and Significance Assessment

An inspection of the relevant databases and sources, including the Historic Environment Record (HER), the National Heritage List for England (NHLE), and the Council's website, has identified numerous Heritage Assets lying within the vicinity of the Site. Following desk based research and on site analysis, professional judgement has been used to identify and select Heritage Assets whose significances may be affected by changes to their settings or direct impacts. This assessment has been undertaken in accordance with Historic England's *Statement of Heritage Significance: Analysing Significance in Heritage Assets* and Historic England's *Advice Note 12 The Setting of Heritage Assets GPA 3*. In accordance with Paragraph 207 of the NPPF the level of detail is proportionate to the Assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

The Heritage Assets that have the potential to be affected by the proposals is outlined below:

1. Numbers 1-19 and Attached Railings, Doughty Street, Grade II
2. Bloomsbury Conservation Area

Other Heritage Assets were identified as part of this process but were excluded from assessment due to either a lack of visible or experiential connection with the Site.

The following section provides a description of the assets above, followed by an assessment of their significance.

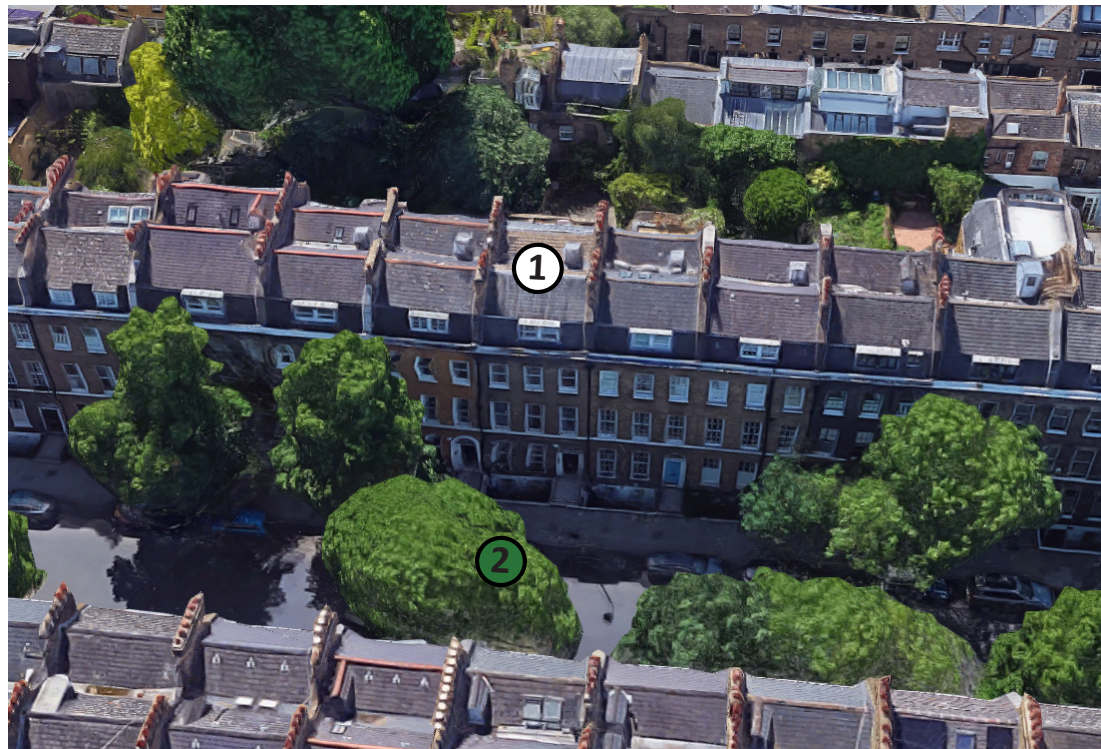


Figure 14 Showing the site (1) which sits within the wider listed terrace. The whole image is located within the Bloomsbury Conservation Area (2).

### 3. Identification of Heritage Assets and Significance Assessment

#### 1. Numbers 1-19 and Attached Railings, Doughty Street, Grade II

The site was grade II listed in 1974 and the list entry reads as follows:

*Terrace of 19 houses. No.1, early C19; Nos 2-14, c1799-1800; Nos 15-19, c1792. Terrace completed by 1820. Built by J Wigg, G Slaton, J Wilson.*

*Yellow stock brick with plain stucco band at 1st floor sill level. Most with evidence of tuck pointing.*

*No.1: stucco ground floor with rusticated quoins. Plain stucco 3rd floor sill band. 4 storeys and basements. Double fronted with 3 windows, splayed 1-window corner treatment and 1-window return to Roger Street, plus single storey 7-window extension. On left hand angle of splay, chimney-stack rising from ground floor through the parapet. Projecting rusticated portico with C20 round-arched doorway having a radial fanlight and panelled door. Ground floor window on corner, round-arched; others with architraves and keystones. 1st floor windows to Doughty Street 2-pane square-headed sashes in segmental-arched shallow recesses. 2nd and 3rd floor windows with gauged brick flat arches to recessed 2-pane sashes. Parapet. Cast-iron plaque on return inscribed "St P x P 1821". INTERIOR: not inspected.*

*Nos 2-5: Nos 3 & 4 now one house. Narrow 3rd floor sill cornice. 4 storeys and basements. 3 windows each. Projecting, round-arched, rusticated porticoes with cornices and later C19 doorways; half glazed (patterned) doors and patterned overlights. Doorway of No.4 replaced by a window. Gauged brick flat arches to recessed 2-pane sashes. Parapets. Nos 4 and 5 with original lead rainwater heads. INTERIORS: not inspected but No.5 noted to have stick baluster stair.*

*Nos 6-19: slated mansard roofs with dormers. No.10 probably refronted. 3 storeys, attics and basements. 3 windows each. Round-arched doorways with panelled or recessed pilaster-jambs (Nos 9, 14 & 15 with attached columns), cornice-heads, most with patterned fanlights, and panelled doors. Gauged brick flat arches to recessed, mostly 2-pane, sashes. Nos 8 and 17 with cast-iron balconies to 1st floor windows. Stucco cornices and blocking courses, except Nos 17 & 18. Most houses have original lead rainwater heads and pipes. INTERIORS: not inspected, but Nos 10, 11, 12 and 14 noted to have stick baluster stair. Information provided (2023) regarding No 14 indicates that internal features of note include the survival of the dividing wall between dining and breakfast rooms on the ground floor (bowed within the dining room, with a central buffet alcove), wheat-ear mouldings to the dining-room cornice, and the cellar, which retains*

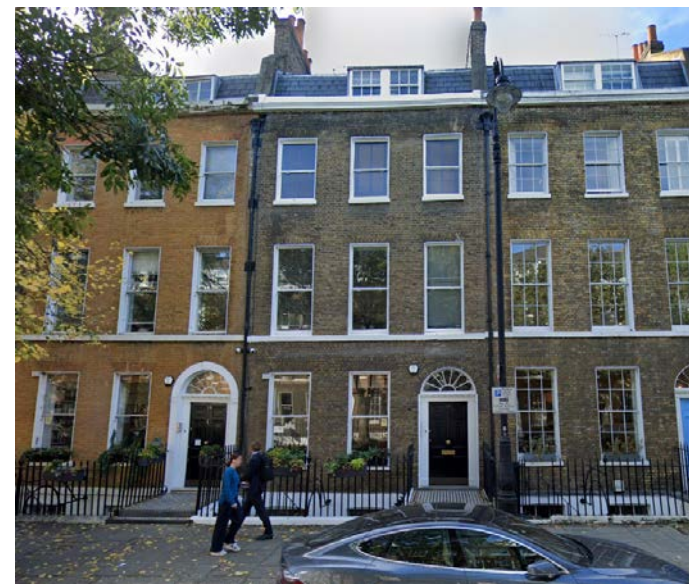


Plate 1 The site (to centre) showing context within the terrace.



Plate 2 Rear elevation showing 1980s extension to foreground and later closet wing visible. All windows visible to this elevation are modern.



### 3. Identification of Heritage Assets and Significance Assessment

wine bins with slate horizontals and York stone verticals; some chimneypieces survive within this house, of standard early-C19 reeding and roundel type.

*SUBSIDIARY FEATURES:* attached cast-iron railings with urn finials to areas.

*HISTORICAL NOTE:* No.14 was the home of Sydney Smith, clergyman, author and wit (LCC plaque).

#### Exterior

The facade of the site retains its historic six panelled entrance door and surrounds with traditional fanlight above. The fenestration across the facade has been replaced with later one over one sashes, with the exception of the attic which features 20th century three over three sashes. Later black and white clay tiles clad the front entrance steps which would have likely originally been stone. Much of the rear has been altered with later sashes, upward extension to closet wing and large 1980s single storey extension.

#### Interior

Starting with the basement level of the building, historic plans have shown that this level has been considerably altered overtime which has resulted in a considerable loss of the floor's original appearance. Access to the level is via an historic timber staircase which incorporates stick balusters and mahogany handrail which likely replaced a metal staircase at some point. The separation between the front and rear room has been lost through the removal of the spine wall although the chimney breasts are still appreciable allowing a part understanding of the original arrangement. In addition to this, the hall wall which would have connected the existing corridor of the stair and the front lightwell has been removed resulting in a larger front room. A door has also been inserted in the party wall with No. 10 disrupting the original floor plan.

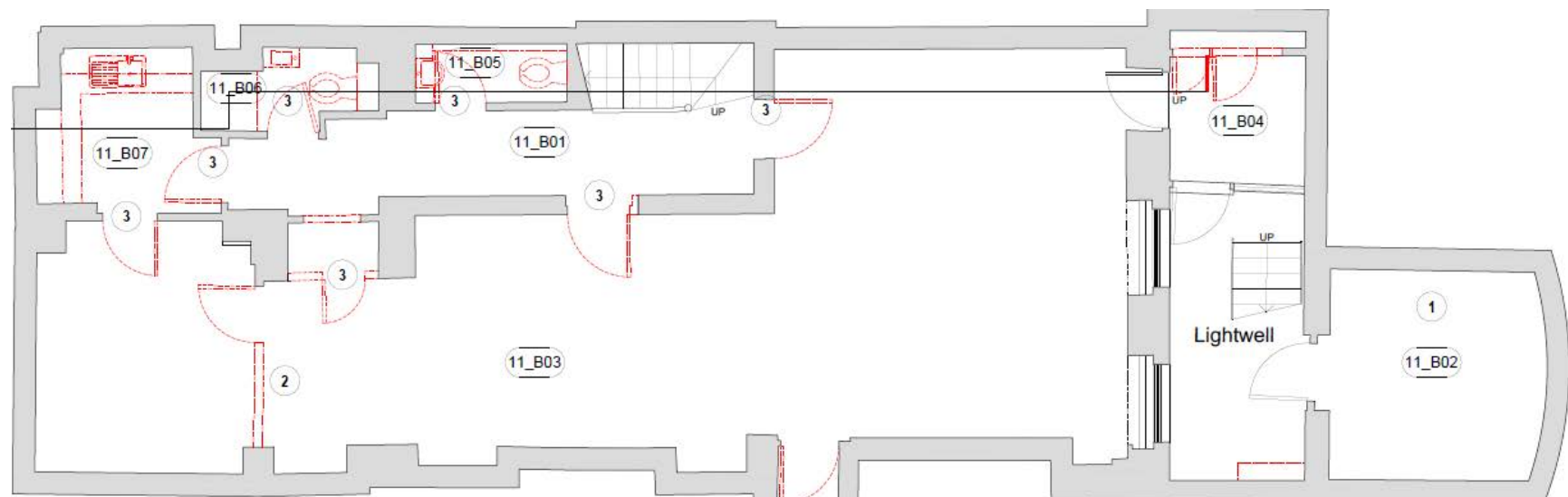


Figure 15 Basement plan showing proposed demolition in red.

### 3. Identification of Heritage Assets and Significance Assessment



Plate 3 View showing front basement room, loss of corridor to left and suspended ceiling visible.



Plate 4 View looking towards rear room showing loss of spine wall and visible suspended ceiling.



Plate 5 View of lateral conversion with No. 10.



Plate 6 View looking towards rear room from front.

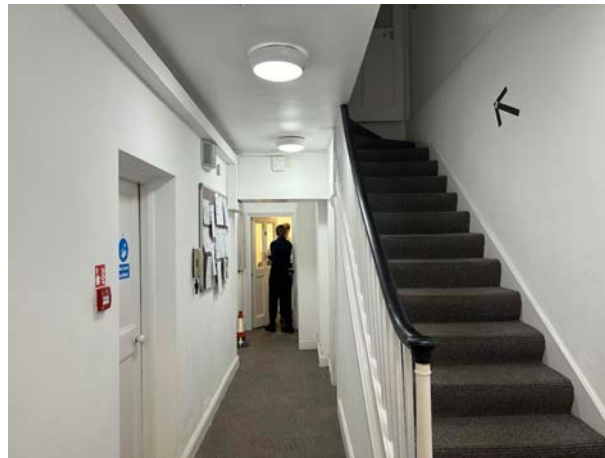


Plate 7 View of hallway with historic stair visible.



Plate 8 Brick arch to front vault.

### 3. Identification of Heritage Assets and Significance Assessment

Moving to the ground floor level, this space contains some of the greatest elements of historic and architectural interest. The entrance hall is carpeted so it is unclear whether any historic fabric survives beneath. The ceiling features an historic block cornice and a modern secondary door way with plain fanlight separating the entrance hall from the stair lobby. The front room is approached via historic curved six panelled doors, the space itself has a typical arrangement of symmetrically placed doors in curved configuration. The dentil cornice appears to be a later addition.

The rear room has lost much of its original appearance, with modern door off the hall and glazed doors to the rear 1980s extension, its chimney breast is still intact and appreciable. Part of the closet wing is still visible although contains no fabric of interest. The rear of the building is dominated by the 1980s extension which is larger than the footprint of the house and of no architectural or historic interest.

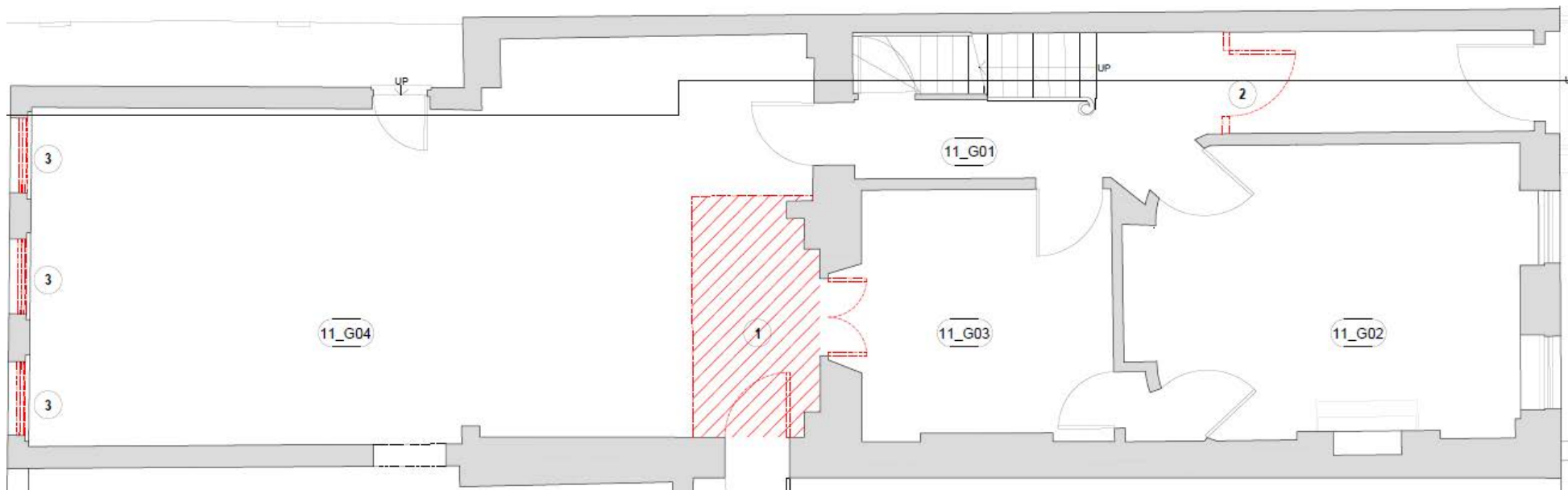


Figure 16 Ground floor plan showing proposed demolition in red.



### 3. Identification of Heritage Assets and Significance Assessment



Plate 9 View towards front door showing historic joinery, open string stair and modern secondary door with fanlight to entrance.



Plate 10 View of historic cornicing to hallway.



Plate 11 View of front room showing 20th century dentil cornice



Plate 12 View of rear room with modern door and stripped of features.



Plate 13 Modern doors from historic rear room leading to modern extension.

### 3. Identification of Heritage Assets and Significance Assessment

The first floor level or *piano nobile* was traditionally the most impressive space in Georgian terraces. The front room still remains the largest space within the historic part of the property. The room retains many features of interest including marble fireplace and timber shutters. The rear room similarly features a notable number of features of note similar to the front room, it has lost its historic fireplace but the chimney breast remains appreciable behind modern shelving.

The closet wing to the rear features no fabric of interest and incongruous dual window detailing that detracts from the character and appearance of the building.

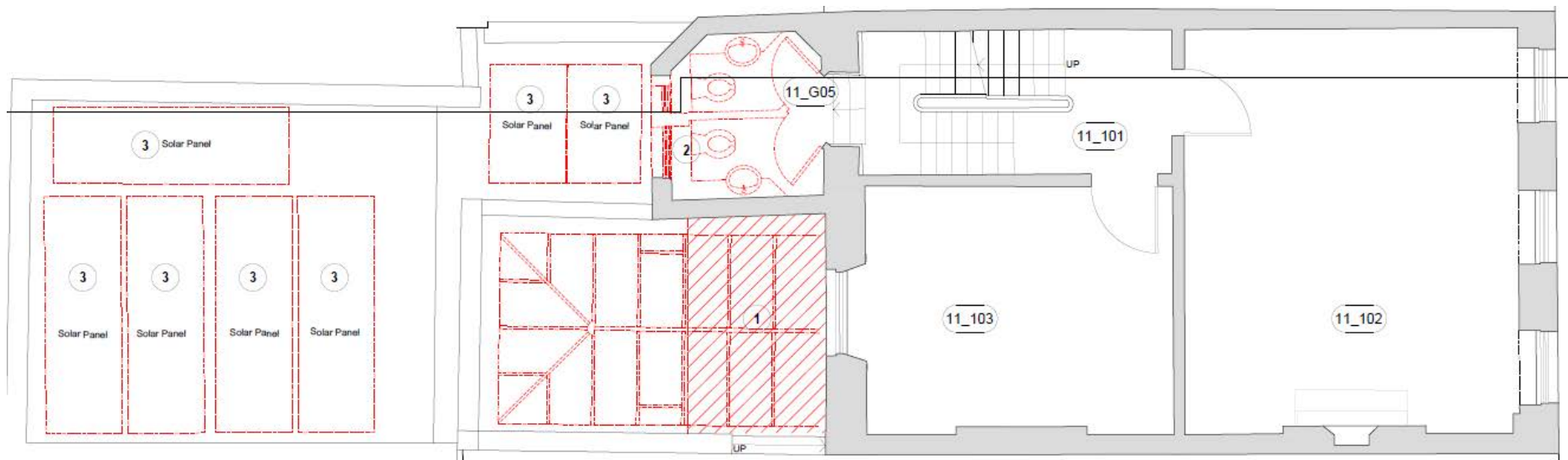


Figure 17 First floor plan showing proposed demolition in red.

### 3. Identification of Heritage Assets and Significance Assessment



Plate 14 Showing front room with later cornice and historic window shutters.



Plate 15 Showing reeded window surrounds and historic shutters and panelling.



Plate 16 Historic marble fireplace with coupled engaged columns and cast iron grate.



Plate 17 Rear room showing reeded cornice windows surrounds and historic shutters.



Plate 18 Rear room has chimney breast obscured by extensive shelving.



### 3. Identification of Heritage Assets and Significance Assessment

Upon approaching the second floor, the original height of the former stair landing window is appreciable, although the window has long since been removed for the later 20th century closet wing extension which houses toilets. The typical Georgian feature of a dual arch partition between the primary and secondary staircase is visible here and of architectural and historic interest (although the window is a later insertion). The secondary stair is historic with plain balusters and classical newel post with plain panelling and door below.

The historic floor plan of this level appears to be intact with three chimney breasts visible in each room and largely symmetrically positioned in relation to the larger rooms. The windows at this level are all modern although architraves and timber shutters do survive.

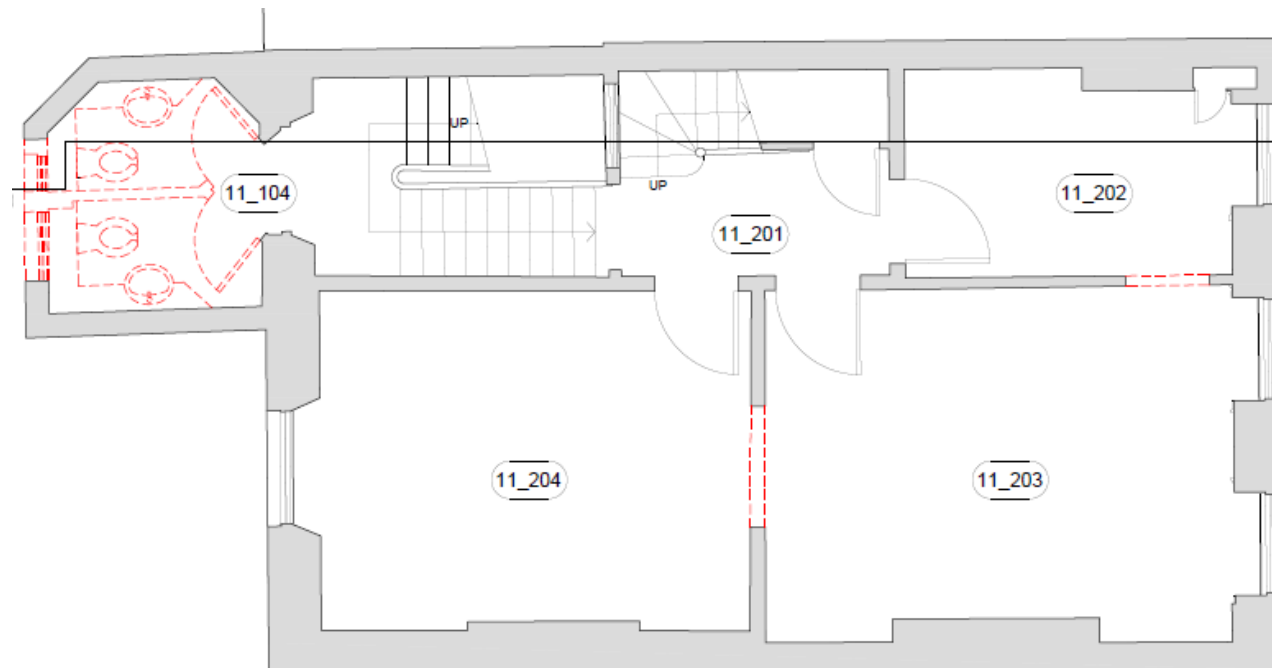


Figure 18 Second floor plan showing proposed demolition in red.

### 3. Identification of Heritage Assets and Significance Assessment



Plate 19 View of modern doors to later closet wing.



Plate 20 Traditional dual opening delineating the principal stair from secondary.



Plate 21 Rear room showing historic plain rail and stile shutter and architraves.

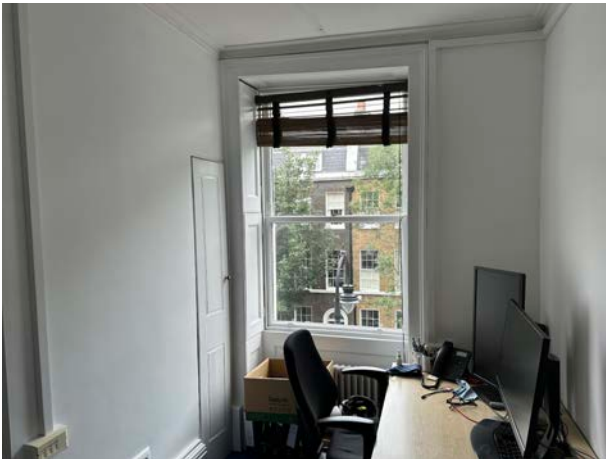


Plate 22 Smaller side front room, with partially blocked chimney breast to left.



Plate 23 Larger front room with historic shutter visible.



Plate 24 Larger front room with historic shutter visible.

### 3. Identification of Heritage Assets and Significance Assessment

The third floor is accessed via the secondary staircase and was traditionally used for servants' quarters or children's bedrooms. As with the floors below, the layout of the space appears to be broadly as it would have been historically although most fixtures and fittings within the space are modern and fireplaces have been removed, although three chimney breasts do survive. Windows within this level are modern although traditionally detailed.

#### Significance

The building is of architectural interest in terms of its wider contribution to the listed terrace and also in its surviving interior historic features. This architectural interest has been eroded to some degree through the loss of features and through the later additions to the rear, but many features are still legible. Similarly, the building has historic and evidential value as part of the wider Doughty Estate development as an important part of the wider development of Bloomsbury. Its setting also largely positively contributes thanks to the retention of much of its original character.

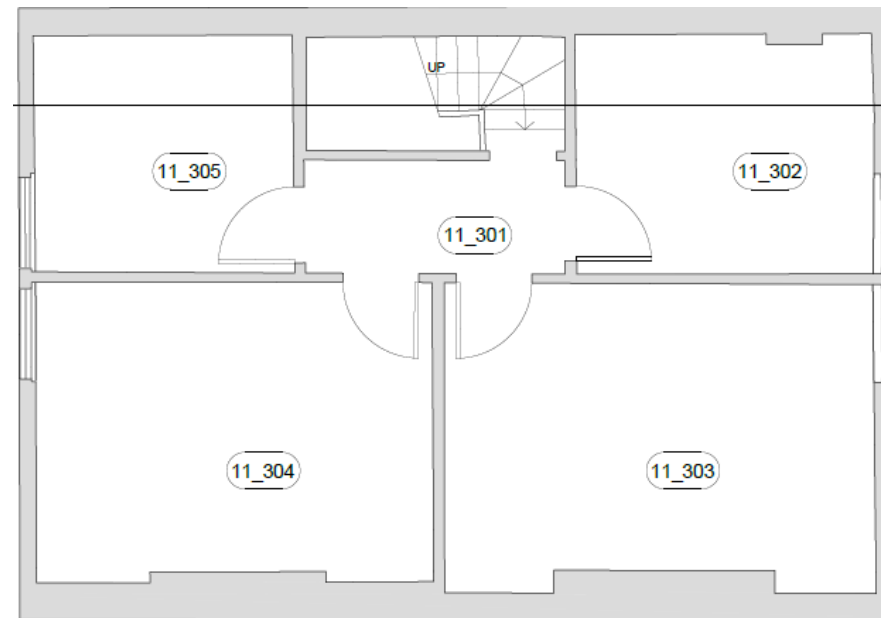


Figure 19 Third floor plan.



### 3. Identification of Heritage Assets and Significance Assessment



Plate 25 View of front attic room showing later three over three sash.



Plate 26 Detailed view of three over three sash.



Plate 27 Attic storey showing no features of interest.



Plate 28 Showing no features of interest.



Plate 29 Showing no features of interest.

### 3. Identification of Heritage Assets and Significance Assessment

#### 2. Bloomsbury Conservation Area

The Bloomsbury Conservation Area was first designated in 1968, largely to protect the Georgian character of the area. It was later extended to protect later Victorian, Edwardian and 20th century development. The most recent Conservation Area Appraisal produced by the council was adopted in 2011.

The Conservation Area is located in the south-east of the London Borough of Camden and stretches from Euston Road in the north to Lincoln's Inn Fields in the south. It covers an area of approximately 160 hectares. Its historic character is defined by the grid-like layout of residential streets which are punctuated by larger institutional buildings (such as the British Museum and University of London) and green, open squares. The built form is predominantly classical, although there is a large mixture of architectural styles found within the later extended areas. This variety is reflected in the fact that the conservation area appraisal identifies 14 character areas in total. The site is located within the 'Sub Area 10: Great James Street/Bedford Row'.

Bloomsbury saw rapid growth in the mid 17th century up until the early 19th century with the advent of the Napoleonic Wars. Its residential popularity receded in the 19th century with educational, medical, commercial and cultural uses dominating.

The significance of the conservation area is as a large area comprising a series of planned elements of formal townscape as the city of London expanded northwards during the 17th and 18th centuries, and later redevelopments of the 19th to 21st centuries.

The conservation area is of historical interest in illustrating the rapid expansion, population growth and prosperity of this part of London from the 17th century, and how its use and character has continuously evolved. The area also is of architectural interest in illustrating past approaches to architectural design, planning, style and use of materials across this period, which has resulted in a rich and diverse townscape of buildings and space with a distinctive sense of place.

The site is located within Sub Area 10, Great James Street/Bedford Row which is described within the council's conservation area appraisal as being:

*...developed during the Georgian and Regency periods under various ownerships, although part of the street pattern was laid out earlier by Nicholas Barbon. The area has a clear street hierarchy structured on a grid layout. Bedford Row, Doughty*

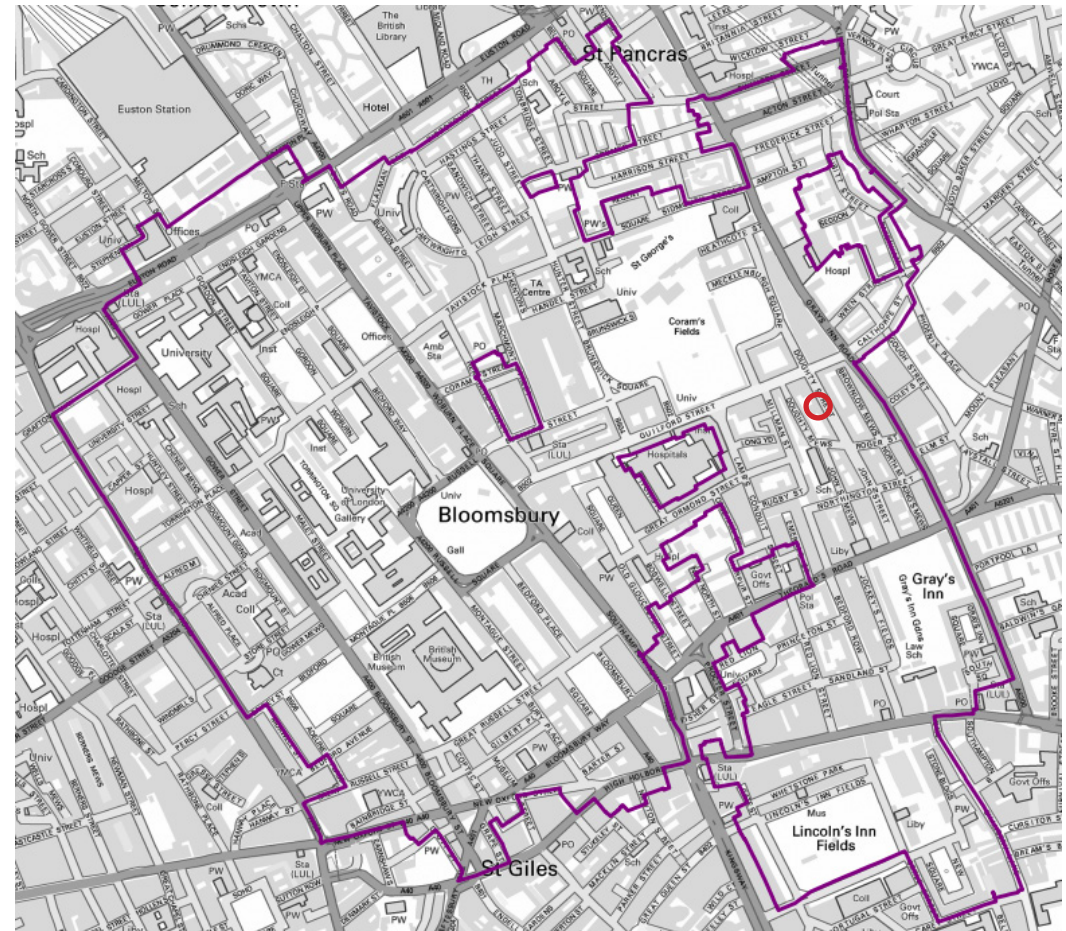


Figure 20 Bloomsbury Conservation Area Map (indicative site location in red circle).



### 3. Identification of Heritage Assets and Significance Assessment

*Street and John Street are wide thoroughfares characterised by larger properties... Although the overall perception is one of homogeneity; there is subtle variation in the detailing of the terraces, often derived from the piecemeal nature of the building process. The strong uniformity in appearance is due to the consistency of materials. Although once primarily residential, the area now has a mixture of uses. The main and secondary thoroughfares (John Street, Doughty Street, Bedford Row, Rugby Street and Great James Street) are dominated by office uses but retain some residential uses (in particular in Millman Street)*

The site itself provides a positive contribution to the conservation area as one of the early developments in the area and as part of the wider listed terrace.



Figure 21 Bloomsbury Conservation Area Map showing sub area 10, Great James Street/Bedford Row (indicative site location shown by red circle).



## 4. Proposals and Assessment of Impact

This section should be read in conjunction with Trehearne Architects' drawing pack, gazeteer and Design and Access statement.

### Proposals

The proposals seek to convert the building back to its original use, from office to residential. Where possible, rooms have been left in their original configuration and are allocated traditional uses on the principal floors. 20th Century additions are proposed to be removed including false ceilings and sanitary arrangements.

The height and staircase configuration of the house dictates that a sprinkler system must be introduced to satisfy Building Regulations. An agile misting systems is proposed as it can be wall mounted (typically above doors) and is less intrusive and would cause less water damage than conventional systems if needed. Where needed, original doors to the staircase, which will be required to offer fire protection, will be upgraded using intumescent systems.

Externally, the rear lightwell to the basement would be reopened to establish the original integrity of the rear elevation and create a clear articulation between the original building and subsequent extensions. Importantly the intervention would reintroduce natural light and air to the basement as originally intended.

### Assessment of Impact

#### General

The restoration of the building to its original single family dwelling use would help realise their optimum viable use (as per the wording of the NPPF) and is considered to have a **beneficial impact** in heritage terms.

A mist sprinkler system is proposed to the staircase and modern service riser is proposed to the rear room rising up the height of the building. These changes are necessary to make the building meet 21st century standards, and would not detract from the key significance of the building, resulting in a **neutral impact**.

#### Basement

It is proposed to reintroduce the hallway wall to the front room and block up the opening between the front room and No. 10. Both these changes would have a considerably **beneficial impact** on the plan form of the building and in turn its significance. In addition to this it is proposed to reintroduce the lightwell to the rear of the building helping to delineate the original part of the building and modern extensions, this too would have a **beneficial impact** on the building. It is proposed to compartmentalise the rear room to provide bathrooms, this would result in a partial erosion of the original layout of the space but is considered to be easily outweighed by other benefits at this level.

#### Ground Floor

Minimal changes are proposed to this level as a result of its sensitive nature. The key changes would be the reintroduction of a lightwell to the rear, which would help to separate the historic elements of the building from the modern, resulting in a **beneficial impact**. It is also proposed to remove the sashes from the modern extension to the rear and replace them with Crittall style French windows. As this element of the building is modern this replacement is not considered to harm any elements of interest and would result in a **neutral impact**.

Lateral connections between the building and No. 10 would be blocked up, helping to restore the original layout of the building resulting in a **beneficial impact**.

## 4. Proposals and Assessment of Impact

### First Floor

Few changes are proposed at this level, reflecting its more sensitive nature. The key change here would be the removal of the dual toilet block in the closet wing for a single toilet. As part of this a new door will be installed and more traditional sash window the rear wall. This would replace the modern incongruous windows resulting in an overall **beneficial impact**.

### Second floor

It is proposed to turn this level into the master suite. As part of this new openings will be made between the front and rear room and the rooms to the front of the building. These changes would cause a slight erosion of the historic circulation spaces of the building, resulting in a **low level of harm**. This harm would be outweighed by the plethora of benefits provided throughout the rest of the building however. As with the floor below the closet wing windows will be replaced with a more traditional sash window, resulting in a **beneficial impact**.

### Third floor

Only minor changes are proposed to this level to allow the provision of a new bathroom to the smallest rear room. No elements of interest will be affected by these changes and would result in a **neutral impact** therefore.

The changes are considered to provide a **beneficial impact** on the conservation area through improvements to the rear elevation.

### Summary

The proposals would provide a considerable opportunity to return the building back to its original use, and restore key features and plan form of interest. As part of this, opportunities have been taken to reinstate original features. These changes provide the opportunity to enhance the significance of the listed building and preserve the character and appearance of the conservation area, and we see no heritage reason why Camden Council should not view the proposals favourably.

# Appendix 1: Legislation, Planning Policy and Guidance

## Legislation

Legislation regarding Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (the 1990 Act).

Section 16(2) states that in considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 66(1) states that, in considering whether to grant planning permission for development that affects a listed building or its setting, the local planning authority (LPA) or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest that it possesses.

Section 72(1) states that, in the exercise of planning functions, special attention should be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

The term “preserve”, within the context of Section 66, has been defined within *South Lakeland District Council v Secretary of State [1992]*, where it was held that the “desirability of preserving” creates a presumption against harmful changes, but not a presumption against any change. Case law has established that the preservation of the setting of a listed building requires considerable importance and weight (i.e. the Barnwell Manor judgment) and that a decision-maker who has worked through the paragraphs of the NPPF in accordance with their terms will have complied with the statutory duty set out in the 1990 Act (i.e. the judgment in *Jones v Mordue & Others [2015]*).

In the judgment for *Palmer v Herefordshire Council* ([2016] EWCA Civ 106), a discussion on the balance between harm and benefit to a listed building was undertaken. It was accepted that “where proposed development would affect a listed building or its settings in different ways, some positive and some negative, the decision-maker may legitimately conclude that although each of the effects as an impact, taken together there is no overall adverse effect on the listed building or its setting”. In essence, where there is some harm and some benefit, these should be given the same weight, and where they are equal in measure, the effect on the listed building would be neutral, and thus its significance would be preserved.

This approach was confirmed in *City & Country Bramshill Ltd v Secretary of State for Housing, Communities And Local Government & Ors [2021]*. In this case Lord Justice Lindblom concluded that ‘the considerable importance and weight to the desirability of preservation [of the special architectural or historic interest of a listed building or its setting], should tip the scales to produce an unequal balance in its favour. However, the SoS should still take account of the actual severity of any change, or scale of change as the Mayoral SPG puts it, and so the extent of impact, as well as the relevance to its significance, and the

importance of the asset. The overall weight to be given to any harm, and the conflict with policy, should be a product of these factors.’

## National Planning Policy Framework (2024)

The policies relevant to heritage are outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’. The NPPF places much emphasis on ‘significance’ which it defines as:

*The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence but also from its setting*

The NPPF directs local planning authorities to require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting and the level of detailed assessment should be ‘proportionate’ to the assets’ importance. (Paragraph 194).

Paragraph 207 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, ‘to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal’.

Paragraph 212 requires that ‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, “clear and convincing justification” (Paragraph 213). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to ‘wholly exceptional’ for those assets of the highest significance such as scheduled monuments, Grade I and grade II\* listed buildings or registered parks and gardens as well as World Heritage Sites.

Paragraphs 214 and 215 discuss different levels of harm caused to heritage assets and requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of non-designated heritage assets. In relation to non-designated heritage assets, paragraph 216 requires a Local Planning Authority to make a “balanced judgement” having regard to the scale of any harm or loss and the significance of the heritage asset.

With regards to conservation areas and the settings of heritage assets,

paragraph 219 requires Local Planning Authorities to look for opportunities for new development to enhance or better reveal their significance.

## Planning Practice Guidance

This guidance supports the NPPF and reiterates the importance of conserving heritage assets in a manner appropriate to their significance. Key elements of the guidance relate to assessing harm. An important consideration should be whether development proposals adversely affect a key element of the heritage asset’s significance:

‘it is the degree of harm, rather than the scale of development that is to be assessed’. The level of ‘substantial harm’ is stated to be a high bar, which may not arise in many cases. Whether development proposals cause substantial harm will be a judgment in the decision-taking process, having regard to the circumstances of the case and by applying the relevant NPPF policies. Such harm may arise from works to the heritage asset or from development within its setting. Setting is defined as:

*the surroundings in which an asset is experienced, and may be more extensive than the curtilage.*

A thorough assessment of the harm development proposals will have on this setting needs to consider, and be proportionate to, the heritage asset’s significance and the degree to which any changes enhance or detract from that significance, and the ability to appreciate and experience it.

## Regional Planning Policy

### The London Plan (2021)

Key extracts from the London Plan relating to this application are outlined below:

Policy D1 London’s form and characteristics

A. Development Plans, area-based strategies and development proposals should ensure the design of places addresses the following requirements:

Form and layout

- 1) use land efficiently by optimising density, connectivity and land use patterns
- 2) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions

Quality and character

- 12) respond to the existing character of a place by identifying the special and valued features that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute to the local



# Appendix 1: Legislation, Planning Policy and Guidance

character

13) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.

Policy HC1 Heritage conservation and growth

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.

## Local Planning Policy

### Camden Local Plan 2017

Relevant policies include:

Policy D1 Design states the Council will seek to secure high quality design requiring, *inter alia*, that development:

- a. respects local context and character;
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- e. comprises details and materials that are of high quality and complement the local character;

Policy D2 Heritage seeks to preserve and where appropriate, enhance heritage assets and their settings. It states that:

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

### Camden Planning Guidance, Design (January 2021)

This guidance supports the local plan and provides information on detailed design issues including design excellence and heritage, and supports policies D1 and D2 in the Camden Local Plan.

### Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

This document outlines the significance of the area, its sensitivities and opportunities for enhancement.

## Guidance Notes

### Conservation Principles, Policies, and Guidance (English Heritage, April 2008)

This document outlines Historic England's approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in their own advice and guidance through the planning process, the document is commended to LPAs to ensure that all decisions about change affecting the historic environment are informed and sustainable. This document was published in line with the philosophy of PPS5, yet remains relevant with the NPPF and PPG, the emphasis placed upon the importance of understanding significance to properly assess the effects of change to heritage assets. Guidance within the document describes a range of 'heritage values' that constitute a heritage asset's significance to be established systematically; the four main heritage values include: aesthetic, evidential, communal or historical. The document emphasises that:

*considered change offers the potential to enhance and add value to places...it is the means by which each generation aspires to enrich the historic environment*

### Historic Environment Good Practice Advice in Planning Notes

GPA 2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on the numerous ways in which decision-making in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that:

*...application proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.*

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

This document outlines the significance of the area, its sensitivities and opportunities for enhancement.

- Understand the significance of the affected assets;
- understand the impact of the proposal on that significance;
- avoid, minimise, and mitigate impact in a way that meets the objectives of the NPPF
- look for opportunities to better reveal or enhance significance;
- justify any harmful impacts in terms of the sustainable development objective

of conserving significance and the need for change;

- offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The advice reiterates that direct physical change may affect heritage assets, or by change in their setting. Assessment of the nature, extent, and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

This document sets out the recommended steps for assessing significance and the impact of application proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.

GPA 3: The Setting of Heritage Assets (December 2017) (2nd Edition)

This advice note focuses on the management of change within the setting of heritage assets. This guidance updates that previously published by English Heritage (The Setting of Heritage Assets 2011) in order to ensure that it is fully compliant with the NPPF and is largely a continuation of the philosophy and approach of the 2011 document. It does not present a divergence in either the definition of setting or the way in which it should be assessed.

Setting is defined as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'. The guidance emphasises that setting is not a heritage asset or a heritage designation and that its importance lies in what it contributes to the significance of the heritage asset itself. Elements of setting may make a positive, negative or neutral contribution to the significance of a heritage asset.

While setting is largely a visual concept, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting, and thus the way in which an asset is experienced, can also be affected by other environmental factors, including historic associations.

This document states that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset. It is further stated that the contribution made to an asset's significance by their setting will vary depending on the nature of the asset and its setting. Different heritage assets have the capacity to accommodate changes and, therefore, setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, Historic England recommend using a '5-step process' to assess any effects of a development proposals on the setting and significance of a heritage asset:

## Appendix 1: Legislation, Planning Policy and Guidance

- Identifying the heritage assets affected and their settings;
- Assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- Assessing the effect of the development proposals on the significance of the heritage asset(s);
- Maximising enhancement and minimising harm;
- Making and documenting the decision and monitoring outcomes.