

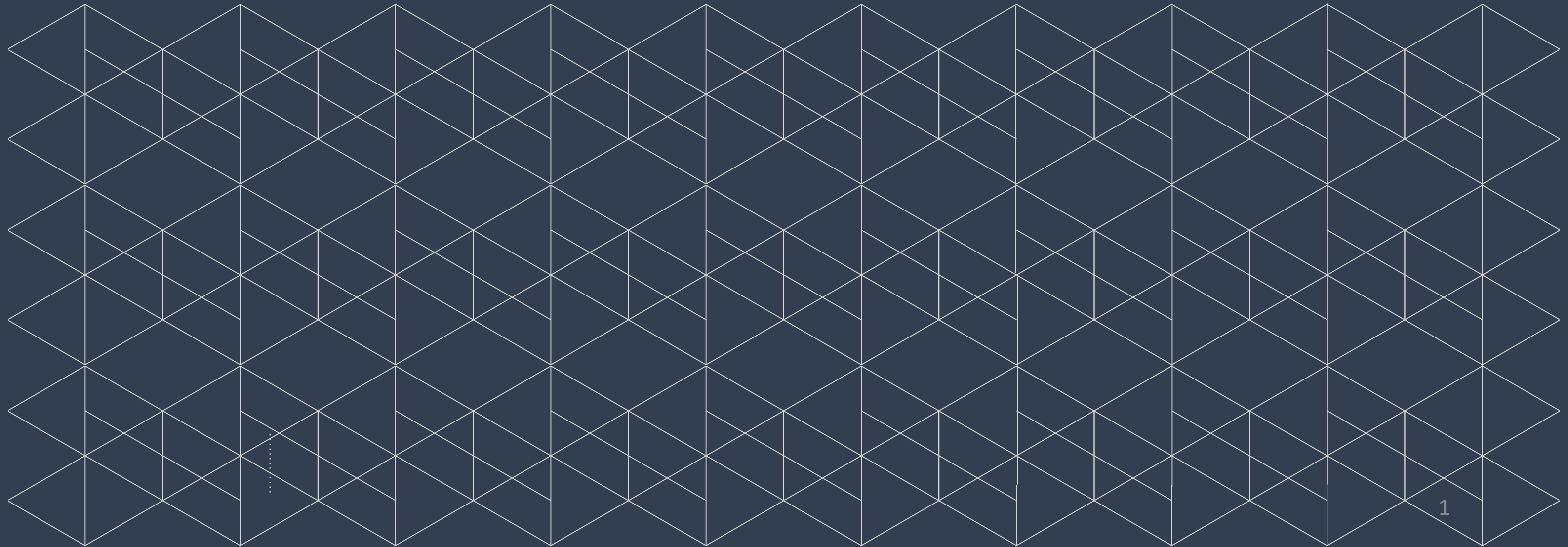
38 Great James Street,
London WC1N 3HB



The
Heritage
Practice

Heritage Appraisal Addendum

May 2025



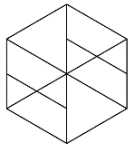
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Heritage Appraisal Addendum
No.38 Great James Street, London WC1N 3HB
May 2025

1 Introduction

1.1 The Heritage Practice Ltd prepared a Heritage Appraisal in November 2025 in support of proposals for an infill extension to the rear of the building, the demolition of the closet wing, creation of a terrace to the roof of the main house and internal alterations at basement and 3rd floor level.

1.2 The proposed scheme (ref: 2025/053/P & 2025/0559/L) has been amended during the course of the application in negotiation with Council officers.

1.3 The changes have been to the scheme include:

1. Change to the design of the roof terrace balustrade;
2. Changes to the fireplaces have been omitted;
3. Replacement of the heating system has been omitted including new air source heat pumps and associated pipework;
4. Changes to the finish flooring have been shown;
5. Minor changes to the internal layout have been made including omitting the lower ground floor and third floor bathrooms and retention of the ground floor rear door.

1.4 This appraisal has been produced as an addendum to the November 2024 Appraisal to take account of the changes the scheme. It should be read in conjunction with the previous statement and revised DAS and drawings prepared by Name Architects.

Research and report structure

1.4 In line with paragraph 200 of the National Planning Policy Framework 2023, the purpose of this appraisal is to define the significance of the listed building and the features which form part of its special architectural and historic interest. Its contribution to the character and appearance of the Bloomsbury Conservation Area will also be assessed.

1.5 The appraisal will go on to describe the proposed works and assess their impact upon the significance and special architectural and historic interest of the listed building and the character and appearance of the surrounding conservation area.

1.6 This Heritage Appraisal has been prepared by Hannah Walker (BA (Hons) Oxon MSc IHBC) who has extensive experience in dealing with proposals that affect the historic environment. She has 15 years of local authority experience, including 10 years as a Principal Conservation & Design Officer at the London Borough of Camden. She also has a wide range of experience in the private sector, preparing heritage statements and appraising the significance of historic buildings. She has trained as a historian, has a specialist qualification in historic building conservation and is a full member of the Institute of Historic Building Conservation (IHBC).

1.7 Historical research for this report was undertaken by Dr Ann Robey FSA, a conservation and heritage professional with over twenty years of experience. She has worked for leading national bodies as well as smaller local organisations and charities. She is a researcher and writer specialising in architectural, social and economic history, with a publication record that includes books, articles, exhibitions and collaborative research.

2 Assessment of the Proposals

2.1 This section will consider the revised scheme and its impact. It will assess this impact in terms of the special architectural and historic interest of the listed building, and the character and appearance of the Bloomsbury Conservation Area, having regard to the previous Heritage Appraisal.

2.2 The majority of the proposed changes (listed in paragraph 1.3 above) seek to omit works which were proposed in the submission scheme. These ultimately result in 'no change' to the specific areas where the omission have occurred. These include omission of the following:

- Heating system, including new air source heat pumps and associated pipework;
- Changes to the fireplace surrounds;
- Inclusion of the WC at lower ground floor level;
- Inclusion of an bathroom at third floor level;
- Removal of a door at ground floor level.

2.3 Under the Planning (Listed Buildings and Conservation Areas) Act 1990, local planning authorities are legally required to:

- Have special regard to the desirability of preserving the listed building or its setting (Section 16 for Listed Building Consent and Section 66 for Planning Permission affecting listed buildings).
- Pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas (Section 72).

2.4 The word "to preserve" means to cause no harm. If you make no change, then you're not altering any physical aspect of the building (e.g., structure, materials, features); you're not impacting its setting, visual appearance, or historical value and you're not introducing uses or elements that conflict with its character. Therefore, logically and legally, 'no change' will result in 'no harm'. In planning terms, "harm" requires some form of change (physical, visual, contextual). No change means no opportunity for harm and the changes therefore comply with the statutory test. This aligns with It aligns with guidance from the National Planning Policy Framework (NPPF) – Paragraphs 200–203 (2023 version), which say harm can range from negligible to substantial but any harm must be justified.

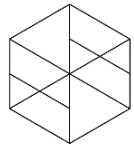
2.5 Elements of the scheme where change has occurred include;

- Change to the design of the roof terrace balustrade; an
- Changes to the finish flooring at ground and first floor levels

Roof terrace balustrade

2.6 LB Camden officers have requested we change the design of the proposed front balustrade at roof level to match no.39 Great James Street (neighbouring property to the south). This was approved to have a 'dummy roof pitch' in the form of a false roof pitch clad in slate. This performed the function of a balustrade to the existing flat roof. The proposed scheme has been amended to comply with this request. The proposed balustrade would be an enhancement on the existing balustrade and therefore comply with the legal tests set out in paragraph 2.3 above.

2.7 It should be noted that the previous iteration of the balustrade was also considered to be an enhancement to the existing balustrade which is a key-clamp style design which is relatively obtrusive and visible from the public realm.



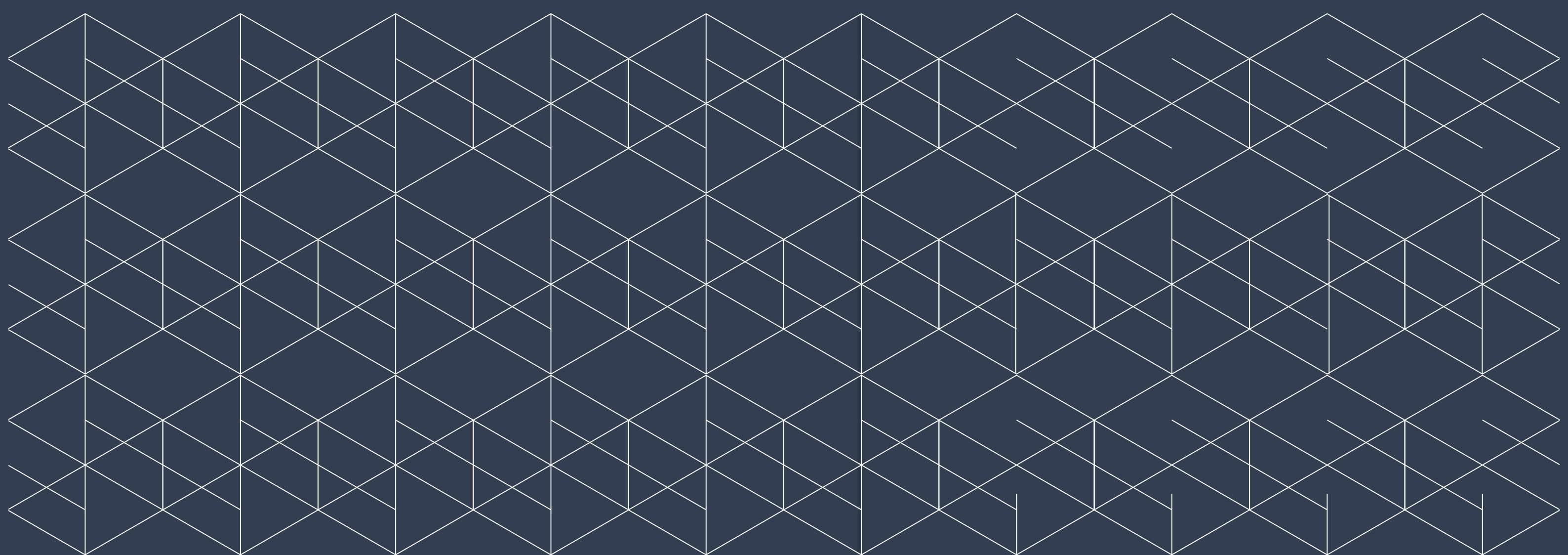
Flooring covering

2.8 The previous design scheme had new hardwood floor finish to the ground and first floors and carpet floor finish to the upper floors, except the bathrooms which are to be tiled. All floors finishes would retain the floorboards beneath. At basement level, the modern concrete sub floor and tiled finish will be replaced, and underfloor heating will be incorporated.

2.9 The revised scheme replaces the hardwood floor finish to the ground and first floor with a carpet floor finish, except to the bathrooms. All floors finishes would retain the floorboards beneath. The new carpet finish would have a similar overall depth including sub-layer to the wood finish. These can be incorporated without requiring the modification of any doors as they have a sufficient gap beneath them. The upper floor covering would remain as previously shown.

2.10 The work would preserve the physical aspect of the historic building (e.g., structure and retained floor boards); The visual setting and visual appearance would be unharmed by the floor covering which the ubiquitous floor coverings.

2.11 The revised proposal are considered to satisfy the s.16 and s.72 statutory requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990. They comply with the requirements of the National Planning Policy Framework 2023, the London Plan 2021 and the London Borough of Camden Local Plan 2017. The proposals will preserve the special interest of the listed building, the setting of adjacent listed buildings and the character and appearance of this part of the Bloomsbury Conservation Area.



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