

**105-121 Judd Street
London WC1H 9NE**

Townscape, Heritage and Visual Impact Assessment

March 2022

Consultancy for the
Historic Built Environment

KMIHeritage

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1 Introduction

- 1.1 This Townscape, Heritage and Visual Impact Assessment has been prepared by KMHeritage on behalf of 105 Judd Street Limited in support of proposals for 105-121 Judd Street, London WC1H 9NE.
- 1.2 This report should be read in conjunction with the accompanying drawings and Design & Access Statement prepared by Stiff & Trevillion Architects and the Planning Statement prepared by Gerald Eve.

The proposed development

- 1.3 Planning permission is sought for:

'Partial demolition and erection of extension at part third floor, fourth floor, fifth floor and rooftop plant in connection with the ongoing use of the building for commercial, business and service uses (Class E); associated external alterations to the elevations, improvements to the public realm and replacement of the existing ramp; roof terraces at levels three, four and five; provision of cycle parking, waste/recycling storage and other services; associated external alterations'.

Purpose

The purpose of this report is to assess the emerging proposals against national and local policies and guidance relating to the historic built environment and architectural and urban design.

Organisation

- 1.4 This introduction is followed by a description of the history of the site in Section 2. Section 3 analyses the heritage and townscape significance of the site and its context. Section 4 sets out the national and local policy and guidance relating to the historic built environment, relevant to this matter. An analysis is provided in Section 5 of the emerging proposal and its potential effect in heritage and townscape terms. Section 6 contains a preliminary visual impact assessment in respect of the

proposal. Section 7 examines the proposal in terms of policy and guidance, and Section 8 is a summary and conclusion.

Authorship and contributors

- 1.5 The author of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. Kevin was an Inspector of Historic Buildings in the London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to this, he had been a conservation officer with the London Borough of Southwark and was Head of Conservation and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect and has a specialist qualification in urban and building conservation.
- 1.6 Assistance in preparing this report was provided by Anne Roache MA MSc. Anne is a conservation professional who began her career at Jones Lang LaSalle and went on to gain broad experience working for leading commercial organizations in the fields of property, planning and law. She specialises in the architectural and social history of London.
- 1.7 The photography and illustration of the views used in Section 6 were prepared by Cityscape Digital.

2 The site and its surroundings

- 2.1 This section of the report describes the history and development of the site and its surroundings.

The site: summary description

- 2.2 105-121 Judd Street is a large, red brick building of the early 20th century, situated in the north-eastern sector of the Bloomsbury Conservation Area, in the London Borough of Camden. The site is bounded by Judd Street to the east, Hastings Street to the north, and Thanet Street to the west. To the south, the site is bounded by 19th century terraced houses and the whole block is terminated at that end by Medway Court. Judd Street is part of a key north-south route running from Guilford Street to Euston Road (fig. 1)
- 2.3 Constructed in two phases, the first was the L-shape section on the north and west of the site between c.1900-10 and the second, onto Judd Street, between 1922 and 1939. The building is described in the Bloomsbury Conservation Area Appraisal - is noted as a positive contributor to the conservation area. The building is not mentioned in Pevsner's assessment of Judd Street.

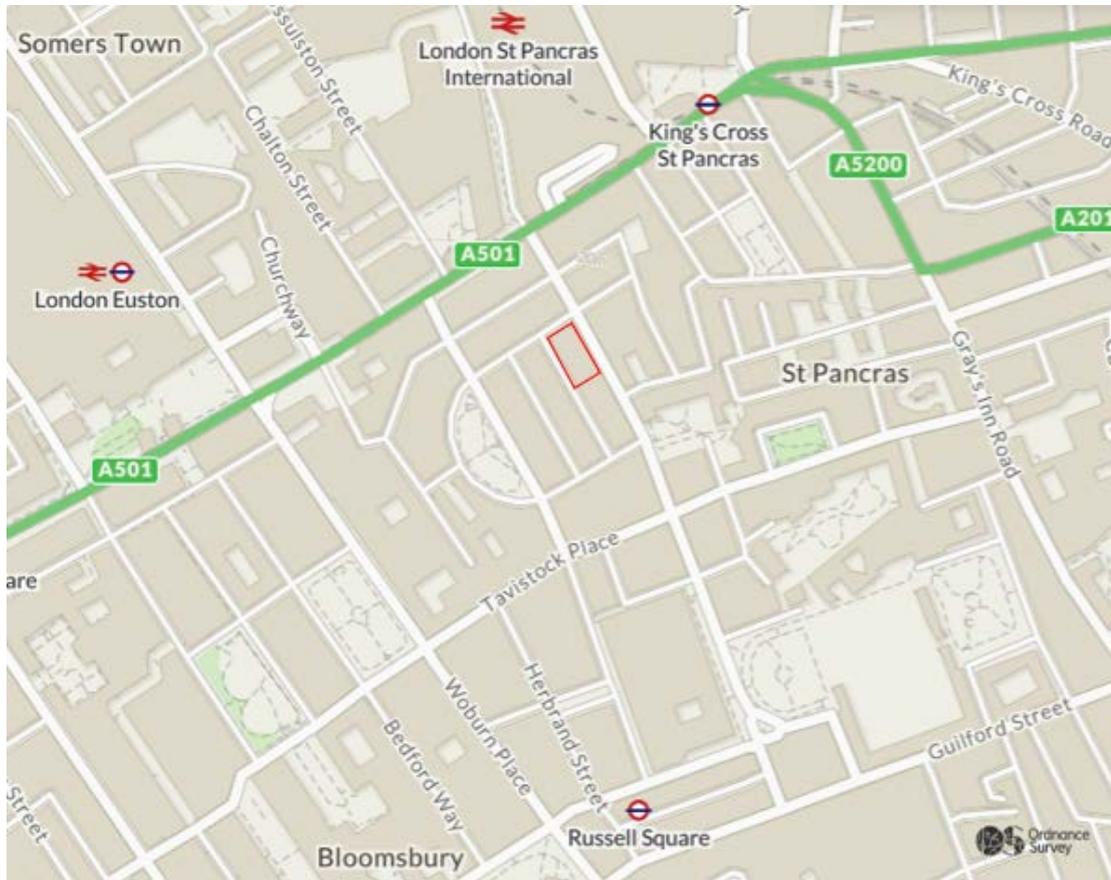


Figure 1: Location of the site

Historical development of the area¹

Early History

- 2.4 The site is located in an area which was originally part of the Skinners' Company (Tonbridge) Estate, land owned by Sir Andrew Judd who, in the 17th century, vested it in the Skinners' Company as Trustees for the benefit of the Tonbridge School in Kent. The estate comprised an area extending slightly north of what became Euston Road, south into Bloomsbury, and slightly west of Judd Street

¹ Sources include: University College London (2011) *Bloomsbury Project*. Online: www.ucl.ac.uk/bloomsbury-project/streets/judd_street.htm; Godfrey, WH and Marcham, WMcB (eds.) (1952) 'The Skinners' Company Estate', *Survey of London: Volume 24, the Parish of St Pancras Part 4: King's Cross Neighbourhood*, pp. 83-93. British History Online: www.british-history.ac.uk/survey-london/vol24/pt4/pp83-93; Cherry, B. & Pevsner, N. (2002) *Buildings of England London 4: North*, p 350 Yale University Press

up to just south of Hastings Street, and just east of Tonbridge Street.

- 2.5 The estate was open fields, including a large bowling green, until the turn of the 19th century when it was laid out to form the street pattern that exists today (fig. 2²). Development was prompted partly by that on the neighbouring Foundling Estate to the south; in 1807 the Skinners' estate followed the Foundling Estate's example and granted building leases to James Burton.

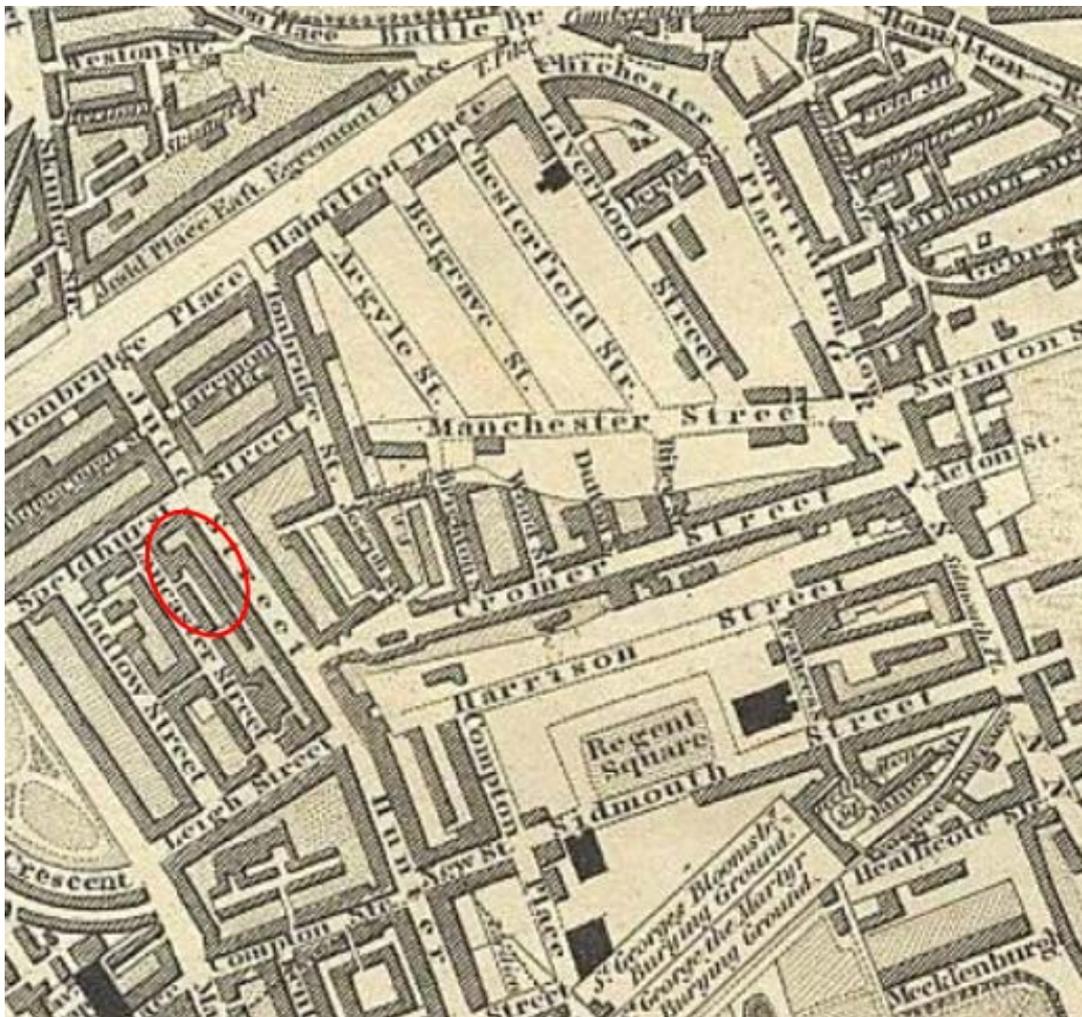


Figure 2: The area around Judd Street, 1827. Location of site indicated

² Greenwood's Map of London, 1827

- 2.6 Judd Street lies was developed by James Burton, William Mitchell, and Francis Oxley from 1808 and was named after Sir Andrew Judd, who gave the estate to the Skinners' Company in 1572. All its houses had been erected by 1816. These were comparatively large, terraced houses designed for relatively well-off occupants including doctors, surgeons, and lawyers; alongside other, smaller properties housing purpose-built shops at ground floor level; including Territt's bookshop and library. The Skinners' Arms public house (now rebuilt) was established by at least 1839.
- 2.7 Nos. 62–63 Judd Street, two terraced houses of c.1808–11, erected by property speculator James Burton, survive from the first phase of building and are Grade II listed. Nos. 87–103, a terrace of 9 houses with shops, also by Burton, are slightly alter c.1816. No buildings from this period remain on the east side of the street.
- 2.8 In 1874, Anthony Trollope published his novel Phineas Finn, which characterises Judd Street as a place of “decent and respectable obscurity”:
- “Judd Street runs into the New Road near the great stations of the Midlands and Northern Railways, and is a highly respectable street. But it can hardly be called fashionable, as is Piccadilly; or central, as is Charing Cross; or commercial, as is the neighbourhood of St. Paul's. Men seeking the shelter of an hotel in Judd Street most probably prefer decent and respectable obscurity to other advantages” (Anthony Trollope, Phineas Finn, 1874)*
- 2.9 The Ordnance Survey map surveyed in 1871, illustrates the townscape which was common for a residential neighbourhood developed during the early part of the 19th century: streets of closely packed terraced houses – the smaller arranged around small back yards, and the larger houses set around garden squares (e.g. Argyle and Regent Squares). St Pancras Station had recently been

completed in 1868 changing the character of the townscape north of Euston Road (fig. 3³).



Figure 3: The area around Judd Street, 1871. Site outlined

Twentieth century

- 2.10 The area saw major changes in terms of townscape in the late 19th and early years of the 20th century when the leases on the earlier properties began to fall in and the Skinners' Estate began to sell freeholds to the recently established London County Council⁴ or philanthropic organisations who demolished the older properties, many

³ OS London (First Editions c1850s) XXVI Surveyed: 1871, Published: 1877

⁴ Established in 1889

of which would have fallen into disrepair, to erect large mansion blocks in their place, aimed at housing the 'reliable' working classes, many of whom had been displaced by major municipal road schemes such as Kingsway as well as slum clearances.

- 2.11 These mansion blocks were built along similar lines with compact flats housed within buildings of up to eight floors and shared facilities such as laundries and washrooms. Their large footprints overwrote the original fine grain residential plots, particularly on the eastern side of the street Mansion blocks such as Queen Alexandra's Mansions, Tonbridge Houses and Hastings Houses. Harmony was achieved through the consistent use of red brick as well as simple decorative details such as stone or stucco string courses, simple architraving around street doors and windows openings and brick detailing used at lower levels or in defining pilasters which referenced the rustication popular in the earlier terraces. It was during this phase that building which is the focus of this report started to be developed.
- 2.12 The residential nature of the area began to change. Hamilton House on Hastings Street, was purpose-built in 1915 for the National Union of Teachers. In 1937, an imposing new Town Hall was erected for the St Pancras Borough Council (later the LB of Camden). The Tonbridge Club⁵ at the corner of Judd Street and Croner Street was built 1932-33 and boasted a gymnasium, theatre, canteen and squash court.
- 2.13 The area suffered from bomb damage during the Second World War being close to strategic targets such as Kings Cross and St Pancras terminals, goods yards and gas works (fig. 4⁶).

⁵ The club was originally founded as the City Mission of the Tonbridge School in 1882 for the benefit of the boys of King's Cross and surrounding area. It closed in the 1990's and the building now houses a performing arts academy.

⁶ Layers of London, online: layersoflondon.org

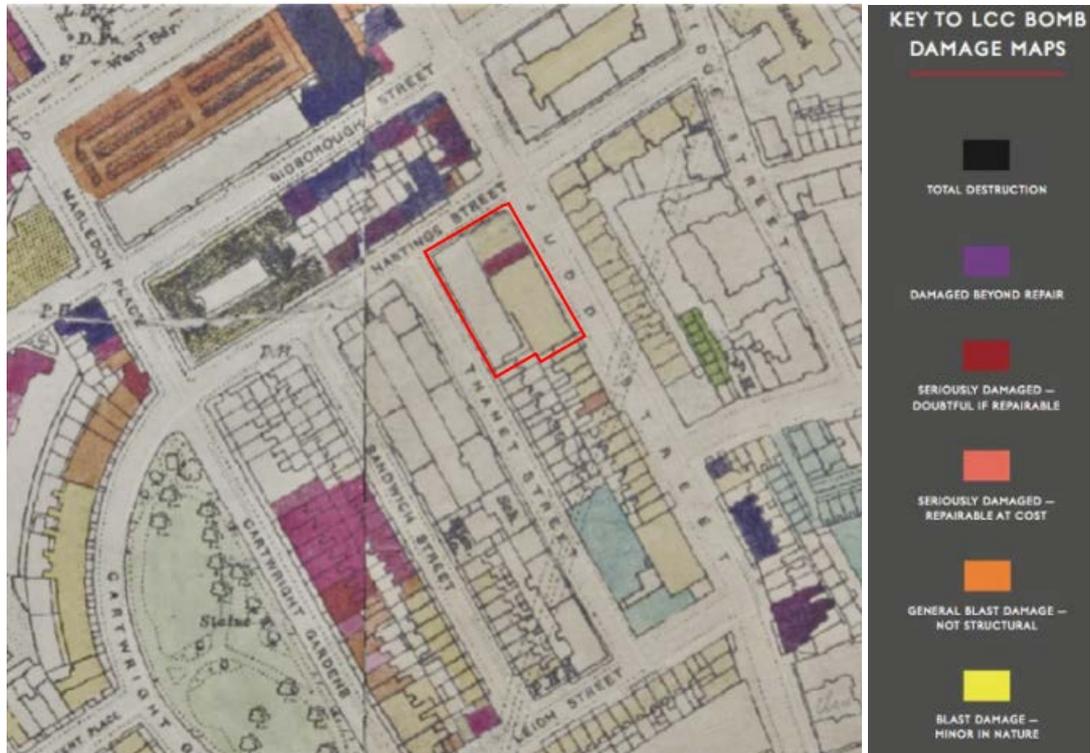


Figure 4: LCC Bomb damage maps (extract)

- 2.14 During the post-war period the Skinners' Estate sold the freeholds of much of its remaining Bloomsbury property and let its Burton Street and Bidborough Street residential properties on long leases to London Borough of Camden.⁷ The site north of Hastings Street was taken for a large telephone exchange.
- 2.15 Medway Court was erected on a cleared bomb site at the southern end of the Judd Street/Thanet Street block. Designed by Denis Clark-Hall,⁸ it was an experimental point block built for the Borough of St Pancras, 1949-55. Of nine storeys with shops at ground floor, its lively

⁷ On Cartwright Gardens the freeholds have stayed 'virtually intact' however with several properties let on long leases to the University of London for halls of residence although most are let to private hotels on shorter leases. Green, S. (1986) *Who Owns London?*

⁸ Clarke-Hall (1910-2006) was a leading post-war modernist architect. Best known for this work on educational buildings however he also deigned housing in Hornchurch and Camden, and civic centres in Egham, Surrey, and Cranbrook, Kent.

design incorporates three wings with concave and convex sides and much use of patterning and colour.⁹ Regent Square was also so badly damaged and it and the surrounding the older streets were cleared and an extensive new housing estate, incorporating a new open space, Bamber Green, was erected by the Council in its place (fig. 5¹⁰).



Figure 5: The post-war landscape around the site, 1951

⁹ Cherry, B. & Pevsner, N. (2002) *Buildings of England London 4: North*. p 350
Yale University Press

¹⁰ OS map TQ3082NW – A Surveyed: 1951, Published: 1953

105-121 Judd Street

- 2.16 The site was constructed in two phases as a purpose-built office premises which necessitated the demolition of the terraced houses on the site. The first phase was an L-shape section on Thanet and Hastings Street wrapping around to Judd Street which was constructed between c.1900-10. The second phase completed the Judd Street elevation, between 1922 and 1939. The first phase of the property is first shown on the OS map published in 1911. (fig. 6¹¹).
- 2.17 Built in red brick, it is a decorative building featuring sandstone accents, large ornately framed windows at ground floor level and a turret on its north eastern corner (first phase). The places where the two phases meet can be discerned on Judd Street through the different elevation treatments at ground floor level with the later phase making bold use of sandstone dressing.
- 2.18 The building was occupied on its completion in 1911 by the Salvation Army and utilised as its Trade Headquarters where all of its business excepting printing was carried out (figs. 6 & 7).



Figure 6: OS map published 1911 (extract)

¹¹ OS London (Land Registry Edition) VII.43 Revised: 1894, Published: 1911. Reprinted: 1942

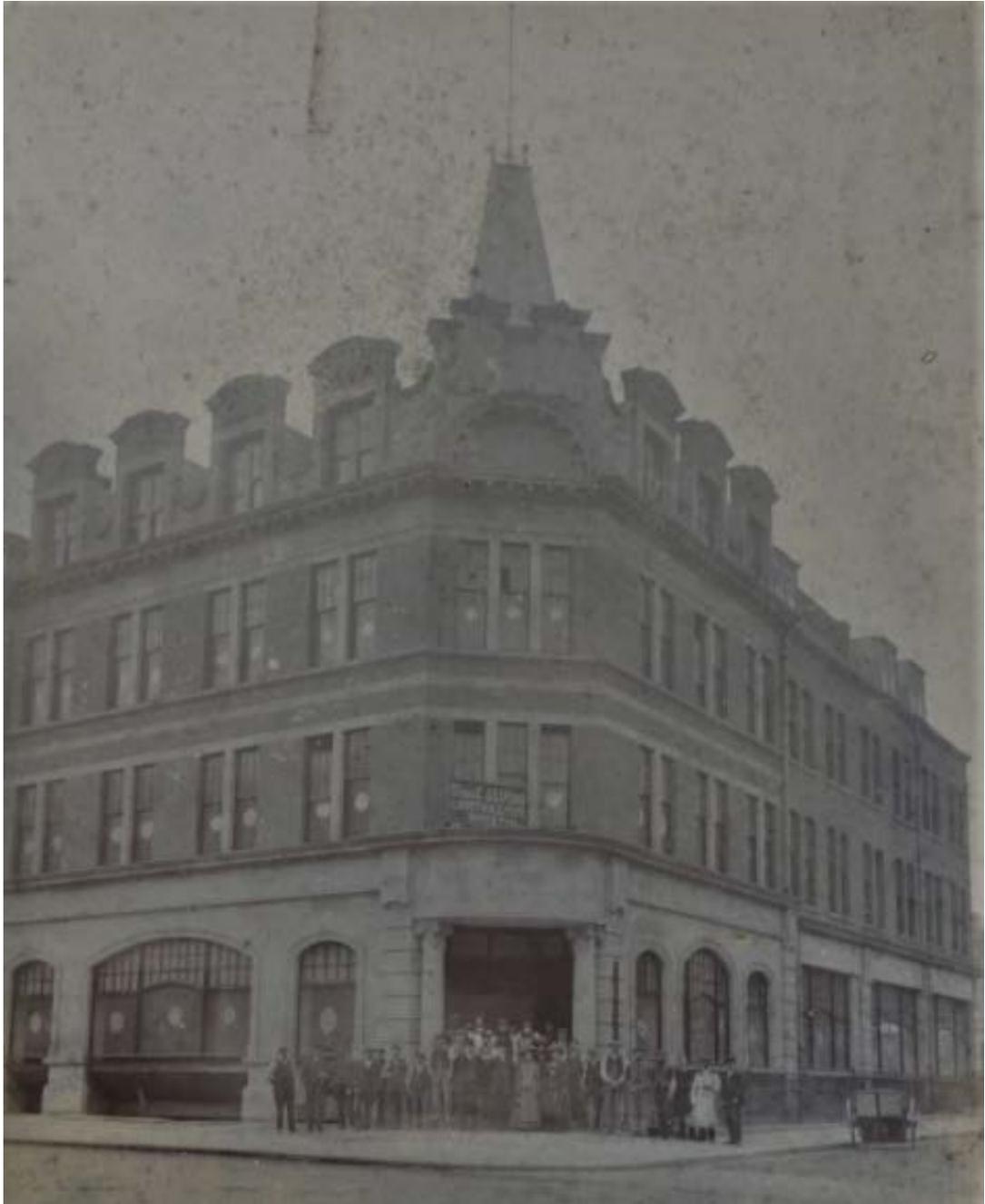


Figure 7: The building shortly after completion in 1911

2.19 The building escaped major damage during the Blitz of the Second World War (figs. 8¹² & 9) and continued to be

¹² © Historic England EAW011085: 'Skinner's Company (Sandhills) Estate, St Pancras, 1947'

occupied by the Salvation Army until 2000 when it was taken by the Royal National Institute of Blind People.

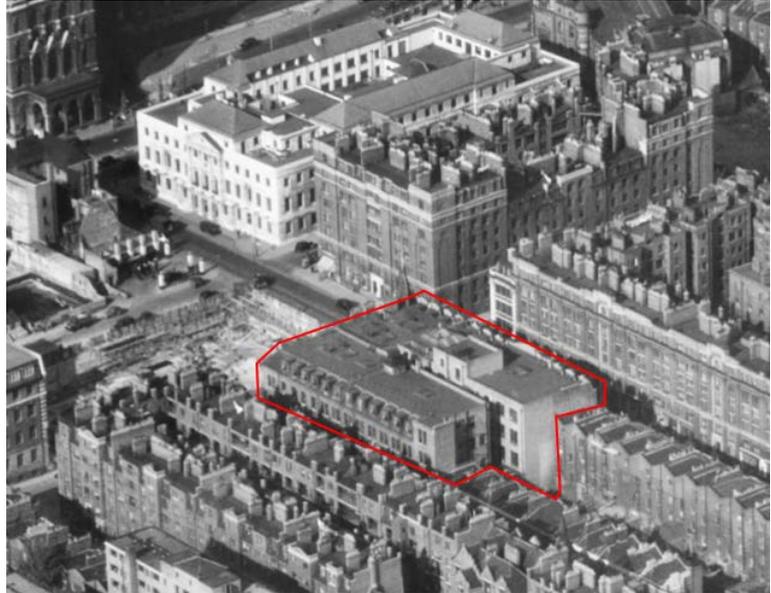


Figure 8: Aerial view of the site, 1947



Figure 9: 105-121 Judd Street, post-war period

3 The heritage and townscape context of the site

Introduction

- 3.1 The heritage context of the site has been established through a search of the Greater London Historic Environment Record (GLHER), the National Heritage List for England and resources provided by the London Borough of Camden, as well as other relevant archives and sources.
- 3.2 In order to establish the heritage baseline, a search was undertaken to identify above ground heritage assets within c.150m of the centre of the site. Given the existing topography and townscape character, it was judged that this would be an appropriate area to examine.

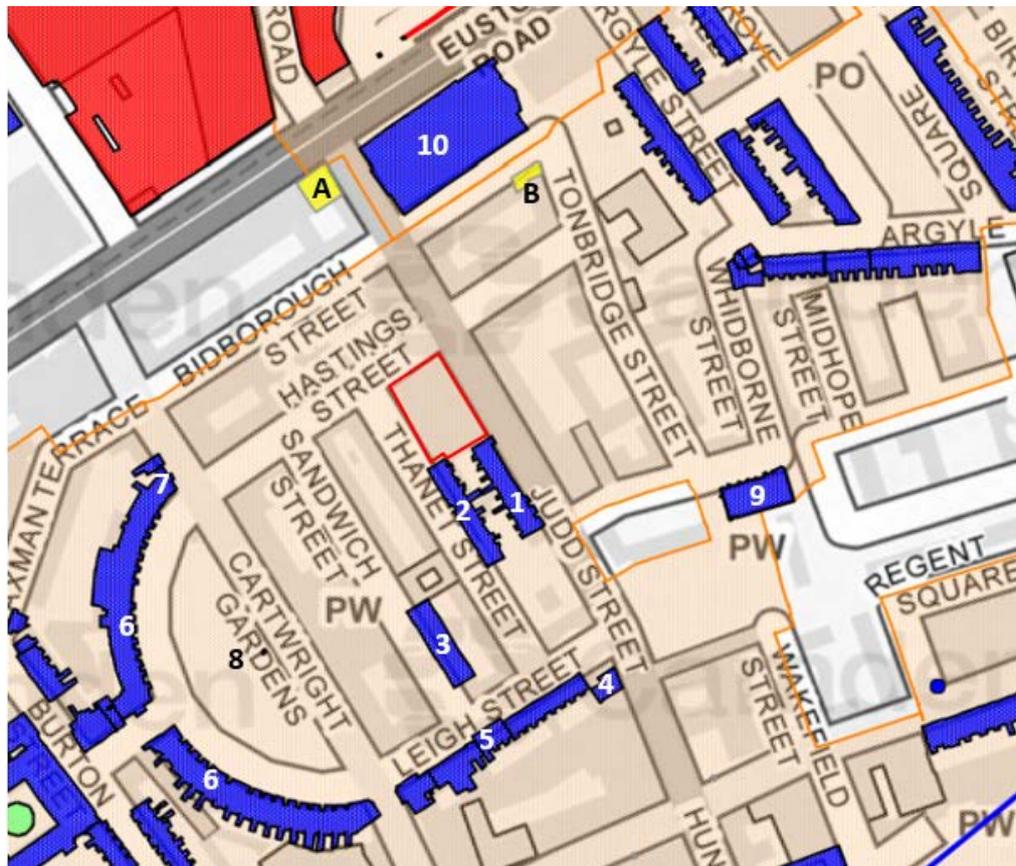


Figure 10: Heritage assets within c.150m of the site (Numbers relate to text below)

Conservation areas

- 3.3 The site lies within the Bloomsbury Conservation Area which was designated in 1968 in order to protect its core Georgian and earlier buildings from development. Numerous subsequent extensions have reflected a growing appreciation of Victorian and Edwardian and high-quality 20th century architecture.
- 3.4 The Bloomsbury Conservation Area is large - approximately 160 hectares - and extremely varied in character being home to institutional, commercial and residential uses encompassing grand and internationally important buildings and institutions such as the British Museum, University College and Senate House; alongside churches, hospitals, hotels and its characteristic terraces of late 18th to early 19th century stock brick houses set around garden squares.
- 3.5 It is a busy, bustling area of students, tourists, transient hospital or academic visitors as well as long-term residents. Its commercial development is minimal and confined largely to business offering day-to-day services for residents.
- 3.6 The Bloomsbury Conservation Area Appraisal and Management Strategy was adopted in April 2011. This divides the overall conservation area into 14 sub-areas - the site is located in sub-area 13: Cartwright Gardens /Argyle Square.
- 3.7 The core interest of this sub area derives from the formal early 19th century street pattern and layout of open spaces, and the relatively intact surviving terraces of houses. Developed mainly by James Burton, it was one of the later areas of Bloomsbury to be completed, and in its early 19th century parts retains a remarkably uniform streetscape. The mature trees to be found in the large formal gardens soften the urban area and provide a foil for the built environment in the summer months.

Listed buildings

- 3.8 Buildings and structures are listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for their special architectural or historic interest.
- 3.9 There are no listed buildings on the site.
- 3.10 There are a number of listed buildings, all Grade II, within c.150m of the site. Figure 10¹³ shows the location of each of these in relation to the site (numbers relate to Figure 10). These are:
1. Judd Street: 87-103 (NHLE 1379160);
 2. Thanet Street 8-17 (NHLE 1378976);
 3. Sandwich Street: 2-9 (NHLE 1245856)
 4. Judd Street: 61 & 63 (NHLE 1379159);
 5. Leigh Street: 1,2 & 3 (NHLE 1379285); 4-8 (NHLE 1379286); 9,10 & 11 (NHLE 1379287); 12-19 (NHLE 1379288);
 6. Cartwright Gardens: Nos. 27-63 (Consec.) and attached railings (NHLE 1244103);
 7. Mabledon Place: 12 (NHLE 1322153);
 8. Cartwright Gardens Statue of John Cartwright (NHLE 1244104);
 9. Cromer Street: Church Of The Holy Cross (NHLE 1067375);
 10. Judd Street: Camden Town Hall (NHLE 1379162).

Non-designated heritage assets

- 3.11 National Planning Policy Guidance defines a 'non-designated heritage assets' as buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.

¹³ GLHER: NHLE assets within 250m of location (TQ329822). © Historic England

The National Planning Policy Framework refers to ‘designated heritage assets and assets identified by the local planning authority (including local listing)’.

3.12 A ‘non-designated heritage asset’ is a building, structure or designed space which is deemed by the local authority to be of local architectural or historic interest and formally placed upon its Local List.¹⁴

3.13 There are two locally listed buildings included in Camden’s Local List within c.150m of the site and these can be seen in Figure 10 (letters relate to Figure 10).

A. Euston Road, No. 73, O’Neil’s Public House

B. Tonbridge St, No. 47 The Dolphin Public House

Views

3.14 The site lies within the Wider Setting Consultation Area of the 6A.1 London Panorama: Blackheath Point (Figure 11)

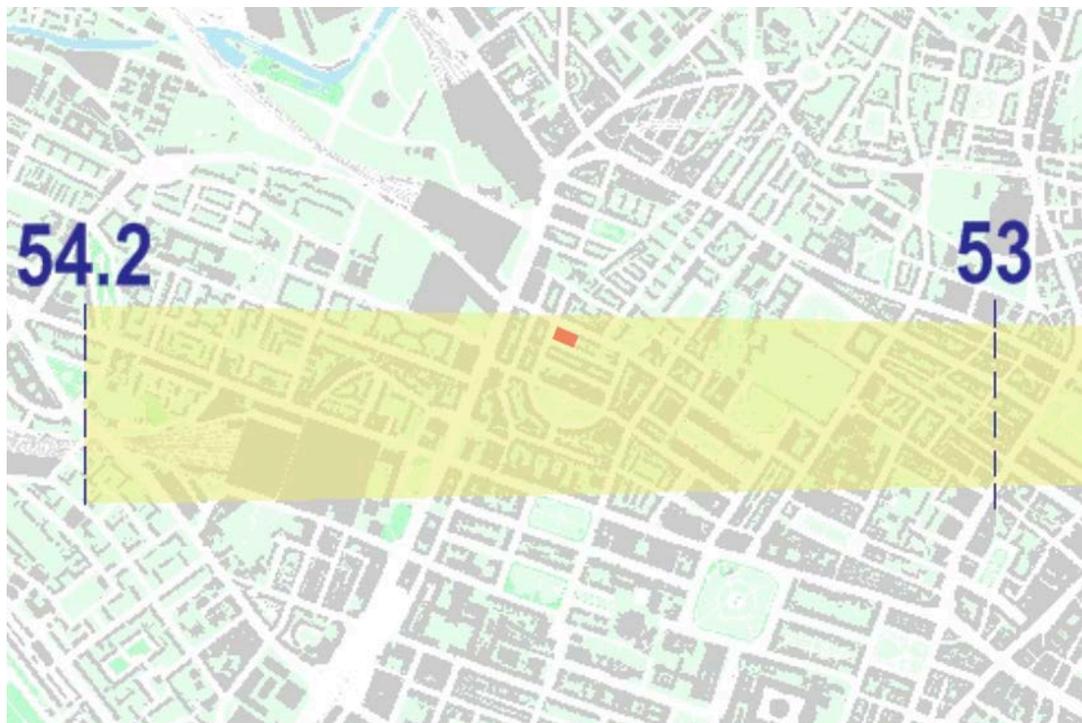


Figure 11: 6A.1 London Panorama: Blackheath Point. Yellow indicates the Wider Setting Consultation Area and the site is indicated in red)

¹⁴ LB Camden Local List, online: www.camden.gov.uk/local-list

- 3.15 The view north along Judd Street to St Pancras Station and the British Library is identified in the Bloomsbury Conservation Area Appraisal as a ‘notable’ view.

Heritage significance

Assessing heritage significance: concepts and terminology

- 3.16 Listed buildings and conservation areas are ‘designated heritage assets’, as defined by the National Planning Policy Framework (the NPPF). Other buildings and structures identified as having heritage significance can be considered as ‘non-designated heritage assets’, and this includes locally listed buildings.
- 3.17 Heritage ‘significance’ is defined in the NPPF 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’.
- 3.18 The Historic England ‘Historic Environment Good Practice Advice in Planning Note 2’ puts it slightly differently – as ‘the sum of its architectural, historic, artistic or archaeological interest’.
- 3.19 ‘Conservation Principles, Policies and Guidance for the sustainable management of the historic environment’ (English Heritage, 2008) describes a number of ‘heritage values’ that may be present in a ‘significant place’. These are evidential, historical, aesthetic and communal value.
- 3.20 ‘Heritage significance’ and ‘heritage values’ are assumed to be conceptually equivalent to each other, and both to the statutory term the ‘special architectural or historic interest’ of listed buildings or conservation areas.
‘Architectural interest’, ‘artistic interest’ or ‘aesthetic value’
- 3.21 The NPPF describes how a building may have ‘architectural’ and ‘artistic interest’ in varying degrees.

‘Conservation Principles’ applies the term ‘aesthetic value’.

- 3.22 In respect of design, ‘Conservation Principles’ says that *‘design value... embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship’*.
- 3.23 The building on the site was constructed in two phases: the first was the L-shape section on the north and west of the site between c.1900-10 and the second, onto Judd Street, between 1922 and 1939. The building is noted as a positive contributor to the conservation area however it is not mentioned in Pevsner’s assessment of Judd Street.
- 3.24 The building is ground plus three-storeys on a sprawling site, occupying the depth of the Judd Street and Thanet Street block. It is of red brick featuring sandstone decoration and large decoratively framed windows at ground floor level and a turret on its north eastern corner. These decorative touches create a characterful building that enlivens the streetscape. Its interior has been heavily altered over time and possesses no intrinsic architectural interest.
- 3.25 The immediate context of the site possesses varying degrees of ‘architectural’ and ‘artistic interest’ (NPPF) or ‘aesthetic value’ (‘Conservation Principles’), identifiable principally in the older buildings of the surrounding townscape and conservation area and is clearly evident in the quality of surrounding Listed buildings.
- ‘Historic interest’ or ‘Historical value’ and ‘Evidential value’*
- 3.26 The building on the site has some historical significance as the headquarters of the Salvation Army’s trading operation during a key period of its development, however the building retains no physical evidence of this past activity.
- 3.27 Its surroundings possess historic interest by virtue of the area’s significance as a part of the 18th century northern

expansion of London via Bloomsbury, its various associations over time, its underlying urban grain, and the historical value of key surviving heritage assets (listed above).

- 3.28 Alteration, demolition and redevelopment has not entirely removed the ability of the earlier townscape to convey the area's historical ethos and the conservation area, Listed and Locally Listed buildings clearly retain sufficient character and appearance to do so.
- 3.29 In terms of Historic England's 'Conservation Principles', the site and its surroundings provide us with '*evidence about past human activity*'. The site and the surrounding buildings, by means of their fabric, design and appearance are a physical record of social and economic change and lifestyles, telling the story of how the area evolved over an extended period of time and evidencing the overlaying of later development onto the greenfield sites that surrounded 18th century London.

Summary

- 3.30 The building 105-121 Judd Street has heritage significance in its possession of evidential and historical value, both in terms of illustrating the development of the area in a certain period but also in its original and subsequent use. It has aesthetic value as an example of Edwardian/inter-war architectural design evidenced in the different approaches on the Judd Street elevation of the building. Despite being built in two phases (a point of some minor historical interest) the building is clearly perceived as one building, though there is a clear architectural hierarchy – the principal elevation is that to Judd Street and the first portion of Hastings Street. The rest of the Hastings Street elevation and that on Thanet Street is simpler.

Townscape character and significance

- 3.31 Townscape character is defined not just by the built environment but also by Judd Street's status as a key north-south transit route through the eastern portion of

Bloomsbury connecting with the Euston Road which can lead it to be busy with road traffic.

- 3.32 The street exhibits a range of building typologies, ranging from early 19th century terraced houses of up to three storeys, through to Edwardian mansion blocks of up to seven storeys (for example Jessel House, Queen Alexandra Mansions, Hastings Houses and Tonbridge Houses), post-war blocks of flats set around small, green spaces (e.g. Medway Court) and large early-mid 20th century commercial and municipal buildings (including Camden Town Hall and a 1950s telephone exchange). There are a few small convenience stores, restaurants, public houses and independent business in Judd Street and Leigh Street but their relatively low-key presence is not enough to engender a bustling local character.
- 3.33 The townscape significance of the site lies in its location – at a key node on Judd Street, an important north-south throughfare through the district and in its physical manifestation. Its corner turret performs a useful townscape role in creating a focal point at the corner of Judd Street and Hastings Street.
- 3.34 The site makes a positive contribution to the setting of nearby designated and undesignated heritage assets.

4 The legislative, policy and guidance context

Introduction

- 4.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment.
- 4.2 Section 6 demonstrates how the proposed scheme complies with statute, policy and guidance. Not all the guidance set out in this section is analysed in this manner in Section 6: some of the guidance set out below has served as a means of analysing or assessing the existing site and its surrounding, and in reaching conclusions about the effect of the proposed development.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 4.3 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act').
- 4.4 Section 16(2) says 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'
- 4.5 Section 66(1) of the Act says that 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or exercise of any features of special architectural or historic interest which it possesses'.
- 4.6 Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention... to the desirability of

preserving or enhancing the character or appearance of that area’.

The National Planning Policy Framework

- 4.7 The National Planning Policy Framework was revised on 20 July 2021 and sets out the government's planning policies for England and how these are expected to be applied. The revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated in February 2019.¹⁵

Design

- 4.8 Chapter 12. of the National Planning Policy Framework deals with design: Achieving well-designed places. It begins:

‘The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process’ (paragraph 126).’

- 4.9 Paragraph 130 sets out a series of expectations regarding design quality and advises that ‘planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

¹⁵ Ministry of Housing, Communities & Local Government (2021). Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

Proposals affecting heritage assets

- 4.10 Chapter 16 of the National Planning Policy Framework: 'Conserving and enhancing the historic environment' deals with Heritage Assets describing them as 'an irreplaceable resource' that '*should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations*' (paragraph 189).¹⁶
- 4.11 Paragraphs 190-193 discuss the responsibilities of the local authority towards plan making and the historic environment.

¹⁶ The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.

- 4.12 Paragraph 194 brings the NPPF in line with statute and case law on listed buildings and conservation areas. It says 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 be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.’

- 4.13 In terms of the local authority, paragraph 195 requires that they:

‘identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.’

- 4.14 Further: ‘where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision’ (paragraph 196).

- 4.15 Paragraph 197 says that ‘In determining applications, local planning authorities should take account of:

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.’

Considering potential impacts

- 4.16 Paragraph 199 advises local planning authorities 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.’
- 4.17 Paragraph 200 continues: ‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.’¹⁷*
- 4.18 In terms of proposed development that will lead to substantial harm to (or total loss of significance of) a designated heritage asset, paragraph 201 states that ‘*local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
- (a) the nature of the heritage asset prevents all reasonable uses of the site; and*
 - (b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*

¹⁷ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

(c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

(d) the harm or loss is outweighed by the benefit of bringing the site back into use.'

- 4.19 It continues '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' (paragraph 202).
- 4.20 In considering the effect of an application on the significance of a non-designated heritage asset the local authority should employ a 'balanced judgement' in regard to the scale of any harm or loss and the significance of the heritage asset (paragraph 203).
- 4.21 Paragraph 204 requires that 'Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred' (paragraph 204).
- 4.22 Where a heritage asset is to be lost, the developer will be required to 'record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible' (paragraph 205).¹⁸
- 4.23 In terms of development within the setting of heritage assets, paragraph 206, advises that '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

¹⁸ Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.

positive contribution to the asset (or which better reveal its significance) should be treated favourably' (paragraph 206).

- 4.24 It goes on however that 'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage site as a whole' (paragraph 207).
- 4.25 Finally, paragraph 208 requires that the onus will be on local planning authorities to 'assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies'.
- 4.26 The setting of a heritage asset is defined in the NPPF 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. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.¹⁹*

Planning Practice Guidance

- 4.27 Planning Practice Guidance²⁰ provides streamlined guidance for the National Planning Policy Framework and the planning system. It includes guidance on matters

¹⁹ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

²⁰ Ministry of Housing, Communities and Local Government, Online: www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment

relating to protecting the historic environment in the section entitled 'Conserving and Enhancing the Historic Environment'. It is subdivided into sections giving specific advice in the following areas:

- Overview: historic environment
- Plan making: historic environment
- Decision-taking: historic environment
- Designated heritage assets
- Non-designated heritage assets
- Heritage Consent Processes and
- Consultation and notification requirements for heritage related applications.

4.28 The Government published an updated Historic Environment section of PPG on 23 July 2019 to reflect the changes made to the National Planning Policy Framework (NPPF) since the 2012 edition.

4.29 In respect of how proposals can avoid or minimise harm to the significance of a heritage asset PPG says:

'A clear understanding of the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm. Analysis of relevant information can generate a clear understanding of the affected asset, the heritage interests represented in it, and their relative importance. Early appraisals, a conservation plan or targeted specialist investigation can help to identify constraints and opportunities arising from the asset at an early stage. Such appraisals or investigations can identify alternative development options, for example more sensitive designs or different orientations, that will conserve the heritage assets and deliver public benefits in a more sustainable and appropriate way.'

4.30 PPG discusses the setting of heritage assets as follows:

'The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the Proposed scheme and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.'

Historic England's Planning Advice²¹

Good Practice Advice

4.31 The guidance provide 'information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the national Planning Practice Guide (PPG)'.

4.32 These notes are:

- GPA 1: The Historic Environment in Local Plans (2015);
- GPA 2: Managing Significance in Decision-Taking in the Historic Environment (2015);
- GPA 3: The Setting of Heritage Assets (2nd ed., 2017);
- GPA 4: Enabling development and heritage assets (2020).

GPA 3: The Setting of Heritage Assets

4.33 This note provides guidance regarding the setting of heritage assets and how to assess the effect of change on that setting.

4.34 The guidance echoes the definition of 'setting' in the NPPF as

'the surroundings in which [the asset] is experienced' and continues: 'its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.

²¹ Historic England, *The Planning System*, Online: historicengland.org.uk/advice/planning/planning-system

- 4.35 The guidance provides, at Paragraph 12, a step-by-step methodology for identifying setting, its contribution to the significance of a heritage asset, and the assessment of the effect of proposed scheme on that significance.
- Step 1: identify which heritage assets and their settings are affected;
 - Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
 - Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;
 - Step 4: explore the way to maximise enhancement and avoid or minimise harm;
 - Step 5: make and document the decision and monitor outcomes.

- 4.36 The document then sets out how the step-by-step methodology is used and considers each step in more detail.

Historic England Advice Notes

- 4.37 This set of advice notes covers various planning topics in more detail and at a more practical level.²² The documents most relevant to the proposed scheme are:

- 4.38 The document most relevant to the proposed scheme is
- HEAN 1 - Conservation Areas;
 - HEAN 4- Tall buildings
 - HEAN 10 - Listed Buildings and Curtilage;
 - HEAN 12- Statements of Heritage Significance: Analysing Significance in Heritage Assets;

²² Historic England Advice Notes:
historicengland.org.uk/advice/planning/planning-system

Conservation Principles, Policies and Guidance for the sustainable management of the historic environment

- 4.39 This document²³ has been referred to in Section 3 of this report.

The London Plan

- 4.40 The London Plan 2021 was adopted in March 2021. It is the overall strategic plan for London, and sets out an integrated economic, environmental, transport and social framework for the development of the city over the next 20-25 years
- 4.41 Chapter 3 ‘Design’ deals with overarching themes in relation to design in the built environment and provides a range of policies concerning the design of new development in London.
- 4.42 Policy D3 ‘Optimising site capacity through the design-led approach’ requires that development proposals should ‘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.’ Further that proposals should ‘respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.’ Policy D4 ‘Delivering good design’ sets out the means by which design proposals should be put forward and assessed.
- 4.43 Section C (1) requires that development proposals address ‘Visual Impacts’ as follows:
- a) the views of buildings from different distances:*

²³ English Heritage (2008) *Conservation principles, policies and guidance for the sustainable management of the historic environment*.

i. long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views

ii. mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality

iii. immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding

c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan

d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area

e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it

f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river g) buildings should not cause adverse reflected glare

h) buildings should be designed to minimise light pollution from internal and external lighting.'

4.44 Chapter 7 'Heritage and Culture' defines 'Heritage significance' (para 7.1.7) as

'the archaeological, architectural, artistic or historic interest of a heritage asset. This may can be represented in many ways, in an asset's visual attributes, such as - form, scale, materials, and architectural detail, design and setting, as well as through historic associations between people and a place, and, where relevant, the historic relationships between heritage assets.' It goes on to say that *'development that affects heritage assets and their settings should respond positively to the assets' significance, local context and character to protect the contribution that settings make to the assets' significance. In particular, consideration will need to be given to mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form'.*

4.45 In terms of development proposals, Policy HC1 'Heritage conservation and growth', says that:

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

Camden's Local Plan

- 4.46 The London Borough of Camden adopted its Local Plan in July 2017. The Plan sets out the Council's planning policies. It replaces Camden's Core Strategy and Development Policies planning documents (adopted in 2010).
- 4.47 Section 7 of the Plan deals with Design and Heritage saying that 'the Council places great importance on preserving the historic environment'.
- 4.48 Policy D1 Design says that:
- 'The Council will seek to secure high quality design in development. The Council will require 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;*
 - d. is of sustainable and durable construction and adaptable to different activities and land uses;*
 - e. comprises details and materials that are of high quality and complement the local character;*
 - f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
 - g. is inclusive and accessible for all;*
 - h. promotes health;*
 - i. is secure and designed to minimise crime and antisocial behaviour;*
 - j. responds to natural features and preserves gardens and other open space;*

k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,

l. incorporates outdoor amenity space; m. preserves strategic and local views;

n. for housing, provides a high standard of accommodation; and

o. carefully integrates building services equipment. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'

4.49 Policy D1 also addresses Tall Buildings, Public Art and Excellence in Design.

4.50 Policy D2 Heritage deals with Camden's heritage assets. The policy says that:

'The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.'

4.51 In relation to designated heritage assets generally the policy says:

'The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a. the nature of the heritage asset prevents all reasonable uses of the site;

b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;

c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

d. the harm or loss is outweighed by the benefit of bringing the site back into use.'

4.52 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'*.

4.53 In relation to Conservation Areas the policy says:

'In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:

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

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

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

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

4.54 In relation to Listed Buildings the policy says:

'To preserve or enhance the borough's listed buildings, the Council will:

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

j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and

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

- 4.55 In relation to other heritage assets and non-designated heritage assets including those on and off the local list, Registered Parks and Gardens and London Squares the policy states:

'The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.'

Camden Planning Guidance: Design

- 4.56 Updated guidance (CPG) relating to 'Design' was published in January 2021. In regard to Heritage, this sets out that:

'The Council - will make a balanced judgment having regard to the scale of any harm or loss and the significance of the asset/s affected.'

- 4.57 The Council will take account of:

' The desirability of sustaining and enhancing the significance of any heritage asset/s and putting them to viable uses consistent with their conservation;

· The positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality and health and wellbeing;

· The desirability of new development that affects heritage assets to preserve and enhance local character and distinctiveness.

Applicants - will need to show how the significance of a heritage asset, including any contribution made by their setting, has been taken into consideration in the design of the proposed works. The level of detail required will be proportionate to the asset/s importance and no more than is sufficient to understand the potential impact of the proposal on the significance of the asset/s affected.'

5 The proposed development and its effect

Introduction

- 5.1 This section of the report assesses the proposed scheme and its possible effect upon the heritage significance and townscape character of the surrounding context described earlier in this report.
- 5.2 The proposed development is described in the drawings and Design & Access Statement prepared by Stiff + Trevillion Architects, in the Planning Statement prepared by Gerald Eve and in other application documents.
- 5.3 Pre-application advice was sought from Camden Council in respect of the proposals and the ongoing evolution of the design in response to this advice is detailed in the Design & Access Statement. The scheme has been altered and developed in response to pre-application discussions. The scheme has also been reviewed by Camden's Design Review Panel, and amended accordingly.
- 5.4 A detailed assessment of the townscape effects of the proposed scheme, examined through a series of nine townscape views, is provided in Section 6 of this report.

The need for the proposed scheme

- 5.5 105-121 Judd Street has reached a point where its heritage and townscape contribution to the Bloomsbury Conservation Area needs to be secured for the future. The occupants (RNIB) having recently departed, it is assessed that the nature of the building, its footprint and the amount of space it provides represents a potentially good fit with a use consistent with the emerging Knowledge Quarter in the area.
- 5.6 As a large, non-residential building whose interior has no architectural interest and has been heavily altered over time, this is a reasonable assessment of how the building could be re-purposed. Securing the future of the building in this way implies change and investment to optimise the building's usefulness; a successful outcome in heritage

and townscape terms goes hand-in hand with the alteration and extension of the building to accommodate a new, viable use.

The proposed scheme

- 5.7 The flat roof of the building does not retain any evidence of its phased construction, which (as historic aerial imagery indicates) was present for a number of decades. This phased development probably explains why it is such a large flat roof; it is an unusual feature of a building from its period, and has no particular value in itself. The roof now is wholly modern in fabric and appearance, and includes substantial and highly visible plant enclosures. It currently has an extensive, unsightly rooftop plant which can be seen from the street.
- 5.8 The proposed scheme correctly identifies the opportunity for extension as lying in a carefully considered and sensitive roof extension. There is no other direction for the building to go in, if this particular building is to contribute to this part of Camden in the manner envisaged.
- 5.9 This creates two main challenges in heritage and townscape terms. Firstly, to design an appropriate roof-level extension – to the existing crenelated roof line with dormer and bay windows - and, secondly, to ensure that this extension relates sympathetically to the host building.
- 5.10 The design of the roof-level extension is both legible as such – as an extension and distinct from the host building – while also being suitably subservient to the host building, both in its modest and contemporary appearance and the setting back of its mass so as to minimise visibility. It is expressed to Judd Street and Hastings Street as a modern mansard incorporating a steady rhythm of double height contemporary dormers. The extension is chamfered and plain behind the corner turret, providing a clear backdrop. The turret continues to pierce the sky in townscape views. The projecting decorative dormers at 5th floor create a skyline silhouette that echoes, but is distinct from and subservient to, the

profile of the existing building masonry dormers at 3rd floor below.

- 5.11 In order to mediate successfully between the host building and its extension, the scheme proposes the addition of an additional level of masonry floor to replace the (unremarkable) mansard on the 'plainer' elevations of Hastings Street and Thanet Street. This reproduces the existing appearance of these elevations below, with a subtle change to a plainer lintol detail, and remains separated from the elaborate masonry dormers of Judd Street and the corner. The central part of this additional masonry storey on Thant Street is set back as part of a stepped elevation that mitigates the effect of the proposed additional building mass on the western side of Thanet Street.
- 5.12 The result will be a satisfying combination of old and new, the new complementing the old by being different, and visually subservient. The design eschews the tried and tested format of the 'glass box' for a much more subtle and considered approach that draws on the past without imitating it.
- 5.13 The design of the proposed development is very firmly grounded in a comprehensive and rigorous assessment by the architects of the building, surrounding townscape character, and this part of the Bloomsbury Conservation Area. It will enhance the building, the setting of nearby listed buildings and the character and appearance of the conservation area..

Effect on heritage and townscape significance

- 5.14 The heritage assets with potential intervisibility with the proposed scheme are set out in Section 3 above.
- 5.15 Whilst visibility does not automatically equate to heritage harm, the introduction of an extended built form into the setting of nearby heritage assets may have a visual effect upon the experience of a heritage asset. With this in mind, the visual effects of the proposed scheme upon the

Bloomsbury Conservation Area, adjacent listed buildings and adjacent positive contributors to the conservation area has been tested in a series of nine townscapes views, which have been agreed with Camden Council, and which are assessed in detail in Section 6 below.

- 5.16 The conclusion of that assessment is that the effect of the proposed scheme upon the character and appearance of the Bloomsbury Conservation Area or the setting of other nearby heritage assets will be positive and enhancing. Their heritage significance is safeguarded, sustained and enhanced. The character and appearance of the conservation area will be preserved and enhanced.
- 5.17 The effect upon other built heritage assets further from the site will be neutral, given the lack of intervisibility and/or the degree of separation from the site in terms of distance, and their heritage significance will thus be similarly safeguarded and sustained. No harm will arise. The setting of the listed buildings, and thus their special architectural or historic interest, will be preserved. The local interest of positive contributors to the conservation area is similarly preserved.
- 5.18 The proposed development will have a positive effect upon townscape significance and quality, adding visual interest and reinforcing the area's historical grain. The addition of a high-quality piece of contemporary architectural design in a sensitive fashion to a large and rather incongruous flat roof is a progressive step in urban design terms. As well as re-purposing a positive contributor in the conservation area, it will reinforce a sense of place in this part of Judd Street by virtue of its distinctive but complementary design.

6 Townscape, heritage and visual impact assessment

Introduction

- 6.1 This section of the report assesses nine townscape views of the site, analysing the as-existing situation and what is proposed.
- 6.2 The photography and visualisation work was undertaken by Cityscape Digital. An explanation of the methodology for the production of an Accurate Visual Representation (AVR) is provided with the application, along with larger-scale images. The photographs included here are at a small scale for convenience and this section of the report should be read with the larger images provided in the accompanying documentation provided by Cityscape.

The townscape views

- 6.3 A combination of desktop study and fieldwork has been used to determine the significant views of the proposed scheme by identifying potential lines of visibility and heritage/townscape effect both in long and closer views. The methodology employed is detailed in 'Assessment Methodology' below. The nine view points are listed in Table 1 and illustrated in Figure 12.

View	Description	Wireline or Render
1	Judd Street looking south	R
2	Judd Street looking south	R
3	Judd Street looking north	R
4	Judd Street looking north	R
5	Junction of Hastings Street and Thanet Street	R
6	Hastings Street looking east	R
7	Thanet Street looking north	R
8	Thanet Street looking north	R
9	LVMF 6A.1 London Panorama: Blackheath Point.	W

Table 1 : View points



Figure 12: Location of townscape viewing positions (site indicated by a red line; LVMF 6A.1 London Panorama: Blackheath Point not shown)

- 6.4 These key representative viewpoints have been subject to verified photomontage simulations to enable an accurate assessment of the visual impact of the proposal(s) on an existing view. In this report, the assessment of the impact of the proposed scheme on townscape and heritage significance utilises a combination of wireframe images and photorealistic rendered AVRs. Detailed methodology for this process is provided in the accompanying documentation from Cityscape Digital.
- 6.5 Rendered AVRs have been used in views with the highest sensitivity, usually closer views, where accurate representation of form and finish are required. Wirelines are used to indicate scale and placement in longer views and especially to confirm what it would be hidden from

view by intervening forms or to indicate parts that may be more visible in winter.

- 6.6 For each view, the existing situation is described and the proposed effect of the development is assessed.
- 6.7 The text below should be read in conjunction with the analysis contained in the previous and succeeding sections of this report and with the high resolution images provided in the accompanying documentation.
- 6.8 The commentary should be read as a whole. Certain descriptions are not repeated where the same townscape or heritage characteristics or features appear more than once in the views, and the text cross-refers to other views.

Assessment methodology

- 6.9 An analysis of the area around the site has been undertaken to understand the impact the development is likely to have on key townscape features and heritage assets. This includes: urban form, character and architectural quality, the presence of heritage assets, scale and massing, public realm, permeability and linkages, continuity and enclosure.
- 6.10 This assessment has considered the existing physical fabric of the area, the character and settings of conservation areas and listed buildings in the vicinity, the appropriateness of the site for the proposed development, and the character of the proposed design. The assessment of townscape and visual impacts describes how the proposed scheme will affect the elements that make up the townscape, the aesthetic and perceptual aspects of the townscape and its distinctive character and describes how the content and character of views may be affected.
- 6.11 Structured, informed and reasoned professional judgement has been used to take account of quantitative and qualitative factors. This is widely accepted as best practice and is based on an analysis of desk research and field assessment. It is recognised that the character of London is one of contrasts, of historic and modern

buildings, and that modern buildings of high design quality do not necessarily harm the settings of historic assets.

- 6.12 The available guidance for assessing the impacts on townscape, heritage assets and visual amenity of a development is as follows:
- Guidelines for Landscape and Visual Impact Assessment ('GLVIA') (3rd ed.,2013) produced jointly by the Landscape Institute and the Institute of Environmental Management and Assessment;
 - London View Management Framework Supplementary Planning Guidance ('LVMF SPG') (2012); and
 - Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2015) produced by Historic England.
- 6.13 The GLVIA provides advice on good practice and is equally applicable to all forms of 'landscape', including urban townscape. The methodology employed for this assessment is based on approaches recommended in the GLVIA. However, the guidance states that its methodology is not prescriptive in that it does not provide a detailed universal methodology that can be followed in every situation (Paragraph 1.20); the assessment should be tailored to the particular circumstances in each case with an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely impacts. The guidance recognises that much of the assessment must rely on professional judgement (Paragraph 2.23-2.26). The GLVIA states that an assessment should in most cases clearly address both how the proposal will affect the elements that make up the aesthetic and perceptual aspects of the townscape and its distinctive character, and the content and character of views. In a dense urban setting, the landscape and visual assessments are intrinsically linked and impacts are primarily direct and visual; the modelling of

representative verified views demonstrates the likely impacts on the local townscape character as well as on the composition and character of specific views. In this assessment the representative views have been used to consider:

- The impacts of the proposed scheme on the quality and character of the local townscape; and
- The visual impacts of the proposed scheme on the content and character of representative views.

Sensitivity Criteria

6.14 Existing townscape and heritage sensitivity is measured as follows:

Value	Criteria	Sensitivity to change
Exceptional	Strong townscape or landscape structure with distinctive features, exhibiting unity, richness and harmony, no detracting features, and a strong sense of place. Likely to be internationally or nationally recognised, e.g., a World Heritage Site, a group of Grade I listed buildings or a Grade I registered park or garden.	Very high
High	Strong townscape structure with distinctive features, strong sense of place, only occasional detracting features. The townscape is likely to be of importance at the county, borough or district level and contain features of national importance, e.g. a Grade II* or Grade II registered historic park or garden or buildings, or a conservation area containing a high proportion of listed buildings.	High

Good	Recognisable townscape structure with a recognisable sense of place. May be a locally valued townscape, conservation area or contain groups of Grade II listed or locally listed buildings. May have some detracting features.	Medium
Average	Distinguishable townscape structure, some positive features, prominent detracting features.	Low
Low	Weak or disjointed townscape structure, frequent discordant and detracting features.	Very low

Effect Criteria

6.15 The magnitude of change to townscape and heritage receptors is measured as follows:

None	No effect
Negligible (Very Low)	No material change
Minor (Low)	Changes that only make a small difference to the ability to understand and appreciate the historic context or townscape setting. A minor impact may also be defined as involving receptors of low sensitivity exposed to intrusion, obstruction or change of a low to medium magnitudes for short periods of time.
Moderate (Medium)	A change that makes an appreciable difference to the ability to understand the historic context or townscape setting. A moderate impact may also be defined as the result of moderately sensitive receptors exposed to intrusion,

	obstruction or change of a medium magnitude, or highly sensitive receptors exposed to intrusion or change of a low magnitude.
Major (High)	A fundamental change in the appreciation of the resource and historic context or townscape setting. A substantial impact may also be defined as the result of highly sensitive receptors exposed to intrusion, obstruction or change of a high or medium magnitude for prolonged periods

Significance of effect

6.16 These two measures – sensitivity of receptor and magnitude of change – are combined to provide a measure of the significance – major, moderate, minor or negligible – of the effect on townscape or views which will result from the Proposed Development.

	Sensitivity of Receptor		
Magnitude of change	High	Medium	Low
Major (High)	Major	Moderate to Major	Moderate
Moderate (Medium)	Moderate to Major	Moderate	Minor to Moderate
Minor (Low)	Moderate	Minor to Moderate	Minor
Negligible (Very Low)	Negligible/Low	Negligible/Minor	Negligible

Quality of impact criteria

6.17 The quality of the effect of proposals on townscape receptors is measured as follows:

Neutral	There is negligible or no impact
Beneficial	The impact of the development is to improve the condition or circumstances of the townscape receptor
Adverse	The impact of the development is to harm the condition or circumstances of the townscape receptor

View 1: Judd Street looking south

Existing



- 6.18 The view is taken from the east side of Judd Street at the junction with Hastings Street looking south west towards the site. The viewpoint is within the Bloomsbury Conservation Area.
- 6.19 The building that comprises the site can be seen in the centre of the view. To the right-side foreground is the south-western corner of the telephone exchange building (c.1950). Between that building and the site, the western elevation of the Edwardian era Thanet House can be glimpsed. In the centre mid-distance is the terrace of houses with shops beneath making up the Grade II listed terrace of Nos. 87-103 Judd Street. Beyond these, is the northern elevation of Medway Court (1949-1955, 9 storeys). In the left side far distance the front elevation of Clare Court (a 1930s mansion block) can be discerned as the road starts to take on a slight westward curve.
- 6.20 To the foreground of the view, is the usual array of street furniture in the form of bollards, traffic signs, tall

lampposts and bins, along with parked cars. There are a number of street trees and, in their winter condition, the eastern elevation of the site is more visible than it would be in the summer condition when it would be largely hidden by foliage.

- 6.21 Behind the viewpoint is the Queen Alexandra Mansions block.
- 6.22 The harmonious tones of orange-brown brick and cream stone used for the key buildings in the view creates a coherent effect further tied together by the use of rustication at ground floor levels. The spire detail on the north western corner of the site adds visual interest.
- 6.23 The townscape and heritage value of the view is assessed to be *Good*, with a *Medium* sensitivity to change.

Proposed



- 6.24 The proposed scheme is seen against the sky as a wholly roof-like proposal, with the additional masonry storey on Hastings Street blending seamlessly with the host building. The contemporary dormers are expressed as part of roof whose materiality and colour is subservient to the red and beige tones of the masonry building below.
- 6.25 There would be a change of *Low* magnitude to a view of *Medium* sensitivity. The magnitude of effect would be *Minor* to *Moderate*. The quality of effect would be *Beneficial*.

View 2 - Judd Street looking south

Existing



- 6.26 The view is taken from the east side of Judd Street, just north of the entrance to Queen Alexandra Mansions, looking south west towards the site. The viewpoint is within the Bloomsbury Conservation Area.
- 6.27 To the left foreground is an oblique view of the Edwardian era Queen Alexandra Mansions (basement plus 8 storeys) and beyond this the Jessel House mansion block. To the right side foreground is the telephone exchange building (c.1950) at 123 Judd Street with its, later ramped entrance and generous-sized fenestration. Beyond this is the site. From this position the spire at the north western corner of the site is clearly articulated against the sky. The listed terrace at Nos. 87-103 Judd Street is largely hidden by the branches of the street trees. The northern elevation of Medway Court can be seen rising up in the centre distance.

- 6.28 In the centre foreground of the view, Judd Street itself dominates as it cuts through the centre of the streetscape. Street furniture includes traffic lights a pedestrian crossing and the tall lamppost. There are a number of street trees which, in their winter condition, allow more visibility of the buildings in the view than there would be in the summer condition when foliage would partially mask some elevations.
- 6.29 A little way behind the viewpoint is the Grade II Camden Town Hall (1937) and beyond that the Euston Road.
- 6.30 This is a typical streetscape of the area, where complementary building typologies coexist comfortably together and where the use of a limited palette of tonally harmonious materials such as orange-brown brick and cream stone - creates a coherent effect. Interest is found in a subtle variety of forms which are further tied together by the use of rustication at ground floor levels. The spire on the north western corner of the site is prominent.
- 6.31 The value of townscape and heritage sensitivity in the view is assessed to be *Good*, with a *Medium* sensitivity to change.

Proposed



- 6.32 The additional massing at roof level is set back to allow the spire detail on the north western corner of the site to remain a key visual feature. The overall scale of the proposal is consistent, in perspective, with the telephone exchange building. At this distance, the proposal is notable for appearing entirely natural and intended - the proposal creates a composition that is complete and is consistent with the style and appearance of the host building.
- 6.33 There would be a change of *Low* magnitude to a view of *Medium* sensitivity. The magnitude of effect would be *Minor to Moderate*. The quality of effect would be *Beneficial*.

View 3 - Judd Street looking north

Existing



- 6.34 The view is taken from the east side of Judd Street, outside of 94 Judd Street, north west towards the site. The viewpoint is within the Bloomsbury Conservation Area.
- 6.35 To the left foreground, is part of the Grade II listed terrace c.1816 comprising of houses with shops beneath (Nos. 97-103 Judd Street). The site adjoins this terrace to the north. The view is terminated in the distance by the British Library (Grade I) northern elevation to Midland Road and a sliver of the south western tower of St Pancras Station and former Midland Grand Hotel (Grade I) can also be glimpsed. To the right of the image is an oblique view of the Edwardian era Jessel House mansion block.
- 6.36 Judd Street itself dominates as it cuts through the centre of the streetscape. Street furniture includes bicycle hoops and a tall lamppost. There are a number of street trees which, in their winter condition, allow more visibility of the buildings in the view than there would be in the

summer condition when foliage would partially mask some elevations.

- 6.37 The darkened stock brick of the listed terrace segues successfully with the orange-brown brick of the later mansion blocks. The varied shop fronts of the older buildings are complemented by the large windows on the ground floor of the site and their ordered fenestration are reflected in the repetitive upper storeys of the new buildings in the view. The spire on the north western corner of the site is just glimpsed.
- 6.38 The value of townscape and heritage sensitivity in the view is assessed to be *High*, with a *High* sensitivity to change.

Proposed



- 6.39 The proposed scheme, again, appears as a very natural and intended augmentation of the host building - there is, in considering the proposed view, a sense of the inadequacy of the existing situation. Of particular sensitivity is the southern gable of 105-121 Judd Street, and here the design carefully balances the masonry gable and the sloping mansard above. There is no sense of visual imposition on the listed terrace on the left.
- 6.40 There would be a change of *Low* magnitude to a view of *High* sensitivity. The magnitude of effect would be *Moderate*. The quality of effect would be *Beneficial*.

View 4 - Judd Street looking north

Existing



- 6.41 The view is taken from the east side of Judd Street, just south of the junction with Cromer Street looking north west towards the site. The viewpoint is within the Bloomsbury Conservation Area.
- 6.42 To the left foreground, is the Grade II listed terrace c.1816, comprising of 9 houses with shops beneath (Nos. 87-103 Judd Street). The site adjoins this terrace to the north. The view is terminated in the distance by the British Library (Grade I) northern elevation to Midland Road and a sliver of the south western tower of St Pancras Station and former Midland Grand Hotel (Grade I) can also be glimpsed. To the right foreground of the image is the red brick of the former Tonbridge Club building which was constructed in 1932. North of this is an oblique view of the Edwardian era Jessel House mansion block.

- 6.43 The stock brick of the listed terrace works well with the orange-brown brick of the later mansion blocks. The varied shop fronts of the older buildings are complemented by the large windows on the ground floor of the site and their ordered fenestration are reflected in the repetitive upper storeys of the new buildings in the view.
- 6.44 The value of townscape and heritage sensitivity in the view is assessed to be *High*, with a *High* sensitivity to change.

Proposed



- 6.45 At this distance the proposed scheme is seen in the context of the scale of the eastern side of Judd Street. The glimpsed view of the highly important buildings on the major thoroughfare of the Euston Road makes visual sense of the increased scale of Judd Street as it approaches its northern junction with the Euston Road. The proposed scheme helps negotiate the transition from the domestic world of Bloomsbury, as expressed by the listed terrace on the left, to the broader environment beyond.
- 6.46 There would be a change of *Low* magnitude to a view of *High* sensitivity. The magnitude of effect would be *Moderate*. The quality of effect would be *Beneficial*.

View 5 – Junction of Hastings Street and Thanet Street

Existing



- 6.47 The view is taken from the north side of Hastings Street, just west of the junction with Thanet Street looking south east towards the site. The viewpoint is within the Bloomsbury Conservation Area.
- 6.48 The site sits in the centre of the view and dominates it, its lively fenestration at ground floor level adding much interest to the view. To the far left of the image is part of the north western elevation of Jessel House and the Skinners Arms public house. To the far right of the image is a sliver of the northern elevation of the Edwardian era Thanet House mansion block.
- 6.49 The foreground of the image is taken up with the usual array of street furniture in the form of traffic signs, bins and parked cars. There are a number of street trees, which, in their winter condition allow the elevations of the site to be more visible than it would be in the summer condition when it would be largely hidden by foliage.

- 6.50 Behind and to the left of the image, but not seen, is the telephone exchange of c.1950.
- 6.51 The massing, height and materiality of the site is typical of the area where properties commonly encompass a whole block or most of a block.
- 6.52 The value of townscape and heritage sensitivity in the view is assessed to be *Good*, with a *Medium* sensitivity to change.

Proposed



- 6.53 As in other views, the proposed scheme visibly completes what, by comparison with the existing situation, appears as incomplete. The existing building is a familiar component of the townscape of this part of Camden and has many positive qualities, but the proposed scheme demonstrates how the building can be improved by providing it with a better vertical termination.
- 6.54 The stepping of the Thanet Street elevation demonstrates a sensitivity to the residential buildings opposite as well as the lesser scale further south.
- 6.55 There would be a change of a *Medium* magnitude to a view of *Medium* sensitivity. The magnitude of effect would be *Moderate*. The quality of effect would be Beneficial.

View 6 - Hastings Street looking east

Existing



- 6.56 The view is taken from the north side of Hastings Street, at the south western corner of the telephone exchange looking south east towards the site. The viewpoint is within the Bloomsbury Conservation Area.
- 6.57 To the left of the image is the boldly rusticated ground floor of the telephone exchange building. The view east along Hastings Street follows its continuation across Judd Street. To the far right of the image is the northern elevation of Thanet House with shops at ground floor level. East of this is the site and the spire at its north eastern corner can be glimpsed above the rooftops. Further to the east, receding in the view, is part of the north western elevation of Jessel House and the Skinners Arms public house.
- 6.58 Hastings Street runs through the centre of the view flanked by street furniture in the form of traffic signs, bins and lampposts as well as parked cars. There are a number

of street trees, which, in their winter condition allow the elevations of the site to be more visible than it would be in the summer condition when it would be largely hidden by foliage.

- 6.59 Behind the image, but not seen, is the southern elevation of Hamilton House, a purpose-built office building of 1915 built for the National Union of Teachers which still occupies the premises.
- 6.60 This is a typical streetscape of the area, where complementary building typologies and uses coexist comfortably together and where the use of a limited palette of tonally harmonious materials creates a coherent effect. Interest is found in a subtle variety of forms which are further tied together by the use of rustication at ground floor levels.
- 6.61 The value of townscape and heritage sensitivity in the view is assessed to be *Good*, with a *Medium* sensitivity to change.

Proposed



- 6.62 In perspectival terms, from the pedestrian position, the existing building, as extended by the proposed scheme, sits comfortably with Thanet House. The spire at the junction of Judd Street stands clear of the proposed upper floors. In this view, the proposal clearly reads principally as an ‘inhabited roof’ rather than as a wholly solid upward extension.
- 6.63 This would be a change of a *Medium* magnitude to a view of *Medium* sensitivity. The magnitude of effect would be *Moderate*. The quality of effect would be *Beneficial*.

View 7 - Thanet Street Looking North

Existing



- 6.64 The view is taken from a point near No. 12 looking north towards the site. The viewpoint is within the Bloomsbury Conservation Area.
- 6.65 To the left of the image, the eastern elevation of Thanet House can be seen in oblique view. The view is terminated to the north by the southern elevation of the telephone exchange building. To the right foreground of the image are Nos. 13- 17 Thanet Street, part of the Grade II listed terrace of 10 houses. c.1820-22, probably by James Burton. Adjoining to the north of these is the site.
- 6.66 Thanet Street runs through the centre of the view flanked by street furniture in the form of traffic signs and lampposts as well as parked cars. There are a number of street trees, which, in their winter condition allow the elevations of the site to be more visible than it would be in

the summer condition when it would be largely hidden by foliage.

- 6.67 The value of townscape and heritage sensitivity in the view is assessed to be *Good*, with a *Medium* sensitivity to change.

Proposed



6.68 This view illustrates again the central point concerning the completion of what - though familiar and taken as it is found - appears unfinished when a new vertical termination is proposed. The existing scene in this view shows 105-121 Judd Street at its most utilitarian and bland, and the proposed scheme will represent a considerable enhancement over that situation.

6.69 The addition of the massing at upper levels would be prominent in this view, but the existing situation already forms a boundary in terms of scale between Georgian Bloomsbury and later 19th and 20th century development. Such disjunctions in scale are normal and frequent in the historic built environment, and indeed form part of the character and appearance of the Bloomsbury Conservation Area - many other instances, both near the site and in the conservation area generally, can be identified. The proposal carefully ensures that the existing step in scale is not unduly emphasised.

6.70 This would be a change of a Medium magnitude to a view of Medium sensitivity. The magnitude of effect would be Moderate. The quality of effect would be Beneficial.

View 8 - Thanet Street looking north

Existing



- 6.71 The view is taken from the south side of Leigh Street looking north along Thanet Street towards the site. The viewpoint is within the Bloomsbury Conservation Area.
- 6.72 To the left of the image, the eastern elevation of the Edwardian era, Rashleigh House mansion block can be seen in oblique view. The view is terminated to the north by the southern elevation of the telephone exchange building. To the right foreground of the image, and dominating the view, is the southern elevation of Medway Court, a nine-floor point block built for the Borough of St Pancras between 1949-55. The white stucco flank of No. 8 Thanet Street, part of a Grade II listed terrace, can be glimpsed on the north side of the amenity garden space for Medway Court. Adjoining to the north of these is the site and the upper, red brick storeys of its southern elevation can be glimpsed above this.

- 6.73 Thanet Street lies in the centre of the view with cars parked on both sides. There are a number of street trees, which, in their winter condition allow the southern elevation of the site to be more visible than it would be in the summer condition when it would be largely hidden by foliage.
- 6.74 The value of townscape and heritage sensitivity in the view is assessed to be *Good*, with a *Medium* sensitivity to change.

Proposed



- 6.75 The addition of the massing at upper levels would be visible in this view though not in any adverse fashion - the additional massing will be perceived in the context of the tall western side of Thanet Street and Medway Court. There is a relatively small townscape or heritage effect from the proposed scheme. In the summer condition the additional massing at 105-121 Judd Street would be largely hidden by foliage from the street tree on the eastern side of Thanet Street.
- 6.76 This would be a change of a *Low* magnitude to a view of *Medium* sensitivity. The magnitude of effect would be *Minor to Moderate*. The quality of effect would be *Beneficial*.

View 9 - 6A.1 London Panorama: Blackheath Point

Existing



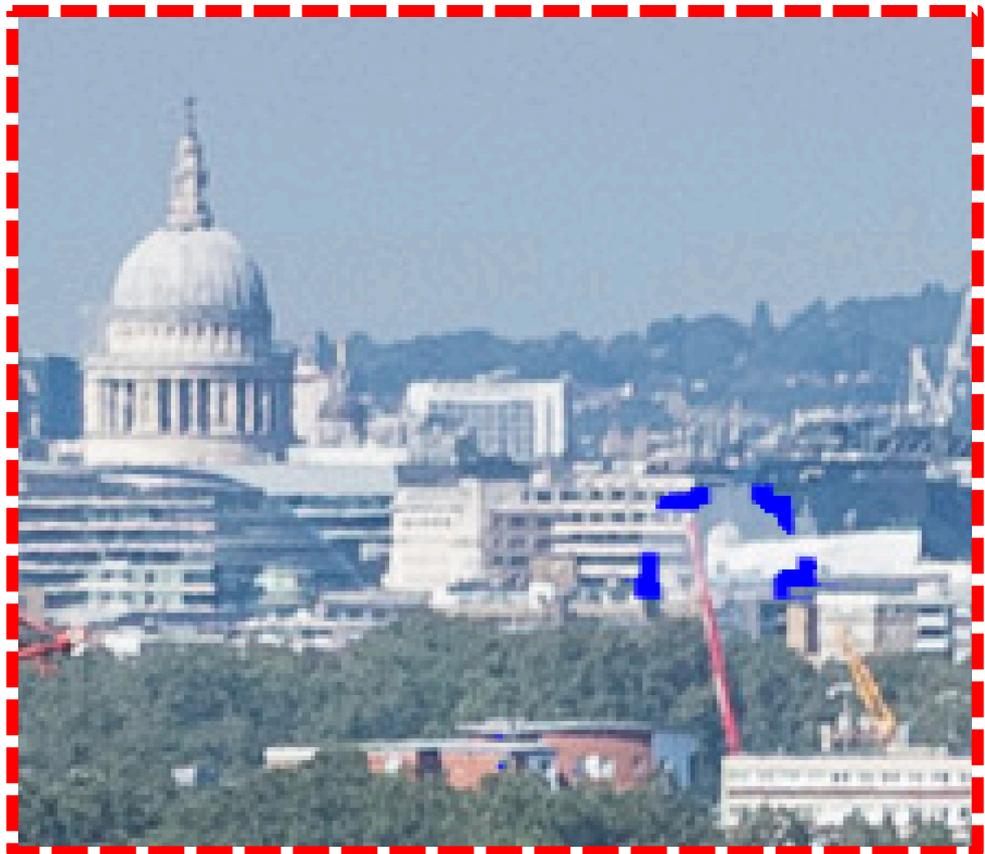
- 6.77 The heritage and townscape significance of this London panorama speaks for itself. The LVMF says of it:

The Viewing Location is a level green space above a dramatic escarpment, partially enclosed by trees. At the western end is an open space with views towards central London. Assessment Point 6A.1 is located at this position, and includes a Protected Vista to ensure development does not have a negative effect on views of St Paul's Cathedral.

- 6.78 Of the Background, the LVMF says:

Development in the Wider Setting Consultation Area should preserve or enhance the viewer's ability to recognise and appreciate St Paul's Cathedral and its western towers. It should generally not be taller than the base of the peristyle of the Cathedral although the effect of colour, scale, reflectivity and distance from the landmark of new development should be understood and tested.

Proposed



- 6.79 The proposed development at 105-121 Judd Street is obscured by intervening built form. There is no heritage and townscape effect.

7 Compliance with policy and guidance

Introduction

- 7.1 This report has provided a detailed description and analysis of the heritage and townscape significance of the site and its context and has described how the proposed scheme would affect that heritage and townscape significance.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 7.2 The conclusion of our assessment, contained in previous sections in this report, is that the proposed scheme preserves and enhances the character and appearance of the Bloomsbury Conservation Area and preserves the setting of nearby listed buildings. The proposed development thus complies with Sections 16, 66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 7.3 It is important to note that the legal requirement regarding satisfying Section 72(1) of the Act was established by *South Lakeland District Council v Secretary of State for the Environment and another* [1992] 1 ALL ER 573 and is met if the proposed development leaves conservation areas unharmed. We believe that it would be difficult to characterise the proposed scheme as doing anything less than leaving the Bloomsbury Conservation Area unharmed. It very clearly enhances the conservation area over its present situation.
- 7.4 To be clear, our assessment is that the development goes beyond mere preservation and will enhance the character and appearance of the Bloomsbury Conservation Area and the setting of heritage assets including listed and locally listed building.

The National Planning Policy Framework

Design

- 7.5 The proposed scheme would be wholly consistent with Chapter 12 of the NPPF ‘Achieving well-designed places’. It is a good example of a design which ‘will function well and add to the overall quality of the area’ and be ‘sympathetic to local character and history, including the surrounding built environment while not preventing or discouraging appropriate innovation or change (such as increased densities);’ as sought by Paragraph 130 of the NPPF. It will ‘establish or maintain a strong sense of place’ and ‘optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development’.

The level and nature of ‘harm’ caused by the proposed development

- 7.6 Having concluded that the proposal will preserve and enhance the relevant designated heritage assets, we now consider whether harm – in the sense used by the National Planning Policy Framework – is caused to these heritage assets.
- 7.7 As outlined in Section 4, the NPPF identifies two levels of potential ‘harm’ that might be caused to a heritage asset by a development: ‘substantial harm (or total loss of significance)’ or ‘less than substantial’ harm. Both levels of harm must be caused to a designated heritage asset – in this instance the Bloomsbury Conservation Area and nearby listed buildings. Harm to non-designated heritage assets is not allocated a level.
- 7.8 The only potential for ‘substantial harm’ (Paragraph 201 of the NPPF) would be if the proposed development for the site caused the loss of something central to the special interest of these heritage assets. The proposal evidently does not give rise to this level of harm.
- 7.9 Similarly, we also do not believe that any ‘less than substantial harm’ (Paragraph 202 of the NPPF) to listed

buildings and conservation areas is caused by the scheme. Our analysis of the proposed development, provided earlier in this report, when considered in relation to legislation, policy and guidance, concludes that no harm is caused to special interest or significance. Change occurs to and in the character and appearance or the setting of designated heritage assets, but this change will preserve the setting of nearby listed buildings and preserve and enhance the character and appearance of the Bloomsbury Conservation Area.

Specific requirements of the NPPF in respect of heritage assets

- 7.10 This report has referred to and used a detailed description and analysis of the significance of the site, its heritage context and all relevant heritage assets, as required by Paragraph 194 of the National Planning Policy Framework (see Section 2).
- 7.11 The proposed development complies with Paragraph 199 of the NPPF in that it conserves the heritage assets affected. Special architectural or historic interest is preserved and no harm to heritage significance is caused. Paragraphs 200, 201 and 202 of the National Planning Policy Framework are therefore not engaged in consideration of the proposed works. Paragraph 203 is not relevant in this instance.
- 7.12 The proposed development is a good example of what is sought by Paragraph 206 of the NPPF: it represents a 'new development within Conservation Areas ...and within the setting of heritage assets [which will] enhance or better reveal their significance' and will 'preserve those elements of the setting that make a positive contribution to the asset'.
- 7.13 In summary, the proposed works very definitely strike the balance suggested by the NPPF – they intervene in the relevant designated heritage assets in a manner commensurate to their special interest and heritage

significance. This balance of intervention versus significance is described in detail earlier.

Historic England guidance on the setting of heritage assets

7.14 In completing our draft assessment, we have followed the step-by-step methodology provided in Historic England's Historic Environment Good Practice Advice in Planning Note 3 which is addressed as follows:

- Step 1: identify which heritage assets and their settings are affected:

This is done in Section 2 and 3 of this report.

- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s):

This is discussed in Section 3.

- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance:

This is undertaken in Section 5 of this report.

- Step 4: explore the way to maximise enhancement and avoid or minimise harm:

This formed part of the design process and pre-application discussions with the local planning authority, and the design has evolved to respond to pre-application advice.

- Step 5: make and document the decision and monitor outcomes:

The submission documents, in particular the Design & Access Statement, and this report record the scheme as amended following design development prior to and during an application for planning permission being made.

The London Plan

- 7.15 The proposed scheme would be consistent with the London Plan and fully complies with its Design (Chapter 3) and Heritage (Chapter 7) policies.
- 7.16 The proposed scheme will be of the highest architectural quality and responds to Policy D3 *'Optimising site capacity through the design-led approach'* by *'positively responding to local distinctiveness and successfully responding to the existing character of the place and in that respects, enhances and utilises the heritage assets and architectural features that contribute towards the local character.'*
- 7.17 It would also be consistent with Policy HC1 Heritage Conservation and Growth in that the applicants have sought to identify, understand and conserve the historic environment and the proposals clearly conserve the significance of nearby heritage assets, and their settings, by being *'sympathetic to their significance and appreciation within their surroundings'*.

Camden's Local Plan

- 7.18 The proposal fully respects and comply with the LB Camden's' policies in relation to Design (D1) and Heritage (D2). The development is a high quality design that respects local context and character and will preserve and enhance the character and appearance of the Bloomsbury Conservation Area.
- 7.19 This report has shown how the significance of surrounding heritage assets, including any contribution made to their setting, has been taken into consideration in the design of the proposed works thus satisfying Camden's Planning Guidance in relation to Design.

8 Summary and conclusions

- 8.1 This report, at Section 2, sets out a brief history of the area, and in Section 3 identifies the heritage assets in the vicinity, and assesses heritage and townscape significance. Section 4 identifies the legislative, policy and guidance context for the development. The proposed scheme and its effect are assessed in Sections 5 and 6.
- 8.2 The report concludes that proposed development will have a positive effect upon townscape significance and quality, adding visual interest and reinforcing the area's historical grain. The addition of a high-quality piece of contemporary architectural design in a sensitive fashion to a large and rather incongruous flat roof is a progressive step in urban design terms. As well as re-purposing a positive contributor in the conservation area, it will reinforce a sense of place in this part of Judd Street by virtue of its distinctive but complementary design.
- 8.3 The effect of the proposed scheme upon the character and appearance of the Bloomsbury Conservation Area or the setting of other nearby heritage assets will be positive and enhancing. Their heritage significance is safeguarded, sustained and enhanced. The character and appearance of the conservation area will be preserved and enhanced.
- 8.4 The effect upon other built heritage assets further from the site will be neutral, given the lack of intervisibility and/or the degree of separation from the site in terms of distance, and their heritage significance will thus be similarly safeguarded and sustained. No harm will arise. The setting of the listed buildings, and thus their special architectural or historic interest, will be preserved. The local interest of positive contributors to the conservation area is similarly preserved.
- 8.5 Section 7 demonstrates how the proposed development will comply with legislative, policy and guidance. We believe that the development will preserve and enhance the special architectural or historic interest of designated

heritage assets (either directly, in the case of the Bloomsbury Conservation Area, indirectly on the setting of nearby listed buildings, or by not having any effect), and it therefore complies with S.16, S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It also preserves and enhances the setting of non-designated heritage assets (nearby locally listed buildings). The proposed scheme is consistent with the urban design and heritage policies of the National Planning Policy Framework, the London Plan and Camden's Local Plan.

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