

**21 Bloomsbury Street**  
London WC1B 3HF

**Townscape, Heritage and Visual Impact Assessment**

July 2022

Consultancy for the  
Historic Built Environment

**KMIHeritage**

## Contents

<b>Table of figures .....</b>	<b>3</b>
<b>1 Introduction .....</b>	<b>4</b>
Purpose .....	4
Organisation.....	4
Authorship and contributors.....	4
<b>2 The site and its surroundings .....</b>	<b>6</b>
The site.....	6
The development of the area .....	6
21 Bloomsbury Street .....	13
The heritage and townscape context of the site .....	16
<i>Introduction .....</i>	<i>16</i>
<i>Conservation area .....</i>	<i>16</i>
<i>Listed buildings .....</i>	<i>18</i>
<i>Other designated heritage assets .....</i>	<i>19</i>
<i>Non-designated heritage assets .....</i>	<i>19</i>
<i>Views .....</i>	<i>19</i>
Heritage significance.....	19
<i>Assessing heritage significance: concepts and terminology .....</i>	<i>19</i>
<i>‘Historic interest’ or ‘Historical value’ and ‘Evidential value’ .....</i>	<i>20</i>
<i>‘Architectural interest’, ‘artistic interest’ or ‘aesthetic value’ .....</i>	<i>20</i>
Townscape character and significance.....	21
Summary.....	22
<b>3 The legislative, policy and guidance context.....</b>	<b>23</b>
Introduction .....	23
The Planning (Listed Buildings and Conservation Areas) Act 1990 .....	23
The National Planning Policy Framework.....	24
Planning Practice Guidance .....	29
Historic England’s Planning Advice .....	30
<i>Good Practice Advice .....</i>	<i>30</i>
<i>GPA 3: The Setting of Heritage Assets .....</i>	<i>31</i>
<i>Historic England Advice Notes.....</i>	<i>32</i>
<i>Conservation Principles, Policies and Guidance for the sustainable management of the historic environment.....</i>	<i>32</i>
The London Plan .....	32
Camden’s Local Plan .....	35

	<i>Planning policy</i> .....	35
	<i>Camden Planning Guidance: Design</i> .....	38
<b>4</b>	<b>The proposed development and its effect</b> .....	<b>40</b>
	Introduction .....	40
	The proposed scheme .....	40
	Effect on heritage and townscape significance.....	41
	Summary and conclusions.....	42
<b>5</b>	<b>Compliance with legislation, policy and guidance</b> .....	<b>44</b>
	Introduction .....	44
	The Planning (Listed Buildings and Conservation Areas) Act 1990 .....	44
	The National Planning Policy Framework.....	45
	<i>Design</i> .....	45
	<i>The level and nature of ‘harm’ caused by the proposed development</i> .....	45
	<i>Specific requirements of the NPPF in respect of heritage assets</i> .....	46
	Historic England guidance on the setting of heritage assets .....	47
	The London Plan .....	47
	Camden’s Local Plan .....	48
<b>6</b>	<b>Summary and conclusions</b> .....	<b>49</b>

## Table of figures

Figure 1: Site location (© Stiff + Trevillion).....	6
Figure 2: Ordnance Survey, 1875-78 .....	9
Figure 3: Ordnance Survey, 1896 .....	10
Figure 4: Ordnance Survey, 1916 .....	11
Figure 5: Ordnance Survey, 1953-54 .....	12
Figure 6: Ordnance Survey, 1965-70 .....	13
Figure 7: 21 Bloomsbury Street in 1914 (© Historic England). .....	14
Figure 8: Undated photograph of 21 Bloomsbury Street in hotel use....	15
Figure 9: Heritage assets in the vicinity of the site (© the London Borough of Camden) .....	17

## **1 Introduction**

1.1 This Townscape, Heritage and Visual Impact Assessment has been prepared by KMHeritage in support of proposals for 21 Bloomsbury Street, London WC1B 3HF.

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.

### **Purpose**

1.3 The purpose of this report is to assess the proposed development 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 in Section 2 by a description of the site and an analysis of heritage and townscape significance. Section 3 sets out the national and local policy and guidance relating to the historic built environment that is relevant to this matter. An assessment is provided in Section 4 of the proposed scheme and its effects. Section 5 assesses the proposals against legislation, policy and guidance. Section 6 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.

## 2 The site and its surroundings

### The site

- 2.1 21 Bloomsbury Street is located at the corner of Bloomsbury Street and Bedford Avenue (Figure 1)



Figure 1: Site location (© Stiff + Trevillion)

### The development of the area<sup>1</sup>

- 2.2 The later Georgian and Regency period saw the rapid expansion of development northwards from Great Russell Street and Great Ormond Street towards to Euston Road as landowners capitalised on demand from the expanding wealthy classes.
- 2.3 On the Bedford Estate, the 4th Duke had initiated the plans to capitalise on the demand for land for building,

---

<sup>1</sup> Historical information in this section is drawn from the Bloomsbury Conservation Area Appraisal and Management Strategy, (Camden Council, 2011) and other sources

although the land to the north of Bedford House was deliberately left open to maintain his view of the hills of Hampstead and Highgate. Plans for Bedford Square, on the western edge of the estate were conceived in the 1760s and following the Duke's death in 1771 were advanced by his widow. Bedford Square was designed and built as a unified architectural composition in 1775-6 (attributed to Thomas Leverton) and was developed by a number of builders with strict controls over the design of the elevations. Its construction marked the beginning of systematic development of the land to the north. Unlike the earlier development, it was intended to be a grander, primarily residential district. Hence, the uniformity of design of the elevations on Gower Street was a result of the contractual controls over issues such as dimensions, materials and surfacing imposed by the Bedford Estate.

- 2.4 The streets surrounding Bedford Square, (such as Bedford Avenue, Gower Street, Store Street and Chenies Street) were developed in the following years principally, by Scott and Grews, but also by Leverton, John Utterton and Alexander Hendry. The form of the narrow fronted terraces reflects the developers' desire to minimise the frontage and maximise the number of dwellings that could be built in each street.
- 2.5 Along the east side of Bloomsbury Street, continuing south from the east side of Bedford Square, the terraced frontage continues to the junction with Great Russell Street. The majority of buildings pre-date Bedford Square, having been constructed from 1766. Architecturally, the townhouses share many of the characteristics of their later counterparts in Gower Street; however, they are of slightly smaller scale and finer detailing. To the south of the junction with Great Russell Street, the buildings are of a variety of ages, architectural styles and materials.
- 2.6 Great Russell Street was laid out around 1670. Many of its 17th century terraced domestic properties were either rebuilt or refaced in the mid-19th century, and shops



inserted into the ground floors. New Oxford Street was created in 1840 to ease congestion in St Giles High Street, cutting through an area of slums known as the Rookery. The Ivanhoe (now Radisson) and Kenilworth Hotels were built on Great Russell Street in 1910, to the south and north of Great Russell Street respectively.

2.7 These hotels read as a group with Bedford Court Mansions, a contemporaneous mansion block of a similar height, scale, detailing and materials. There is a modern extension on Bloomsbury Street on the north side of the Kenilworth Hotel, which makes a neutral contribution to the Conservation Area despite being of an appropriate scale and using sympathetic materials. To the west, the red-brick Bedford Court Mansions line the entire length of Bedford Avenue and turn the corner into Adeline Place. There is a noticeable difference in scale between these mansion blocks and the lower mews properties on the north side of Bedford Avenue.

2.8 The mews fronting Bedford Avenue, to the south of Bedford Square, have an architecturally consistent frontage of two storeys raised on a basement with an mansard attic storey. They are constructed in red brick with contrasting stone and terracotta detailing. Dating from the Edwardian period, they are curtilage buildings accessed from the south side of the square. The line of mature street trees further enhances this side of the street, which acts as an east-west thoroughfare between Bloomsbury Street and Adeline Place.

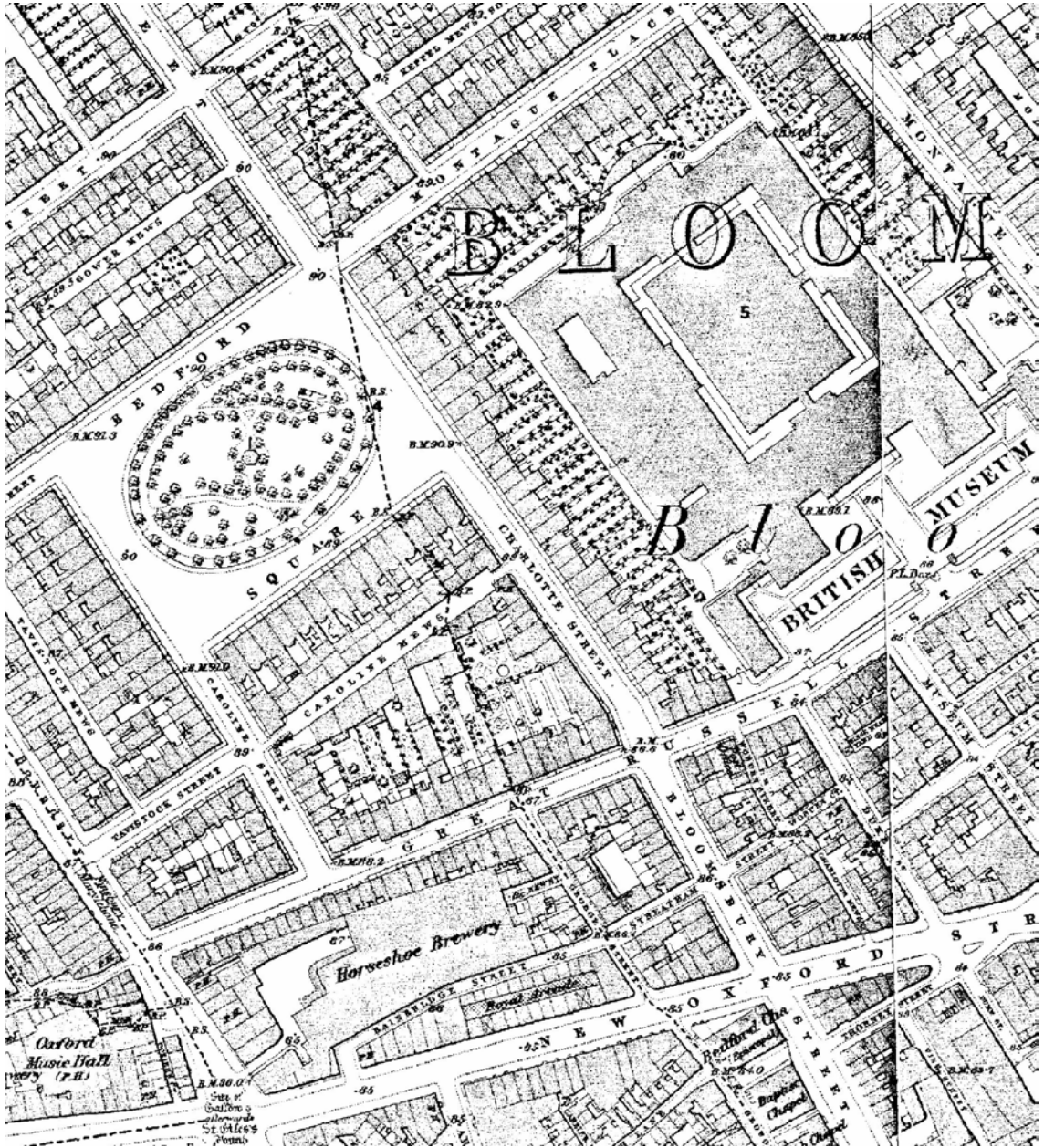


Figure 2: Ordnance Survey, 1875-78

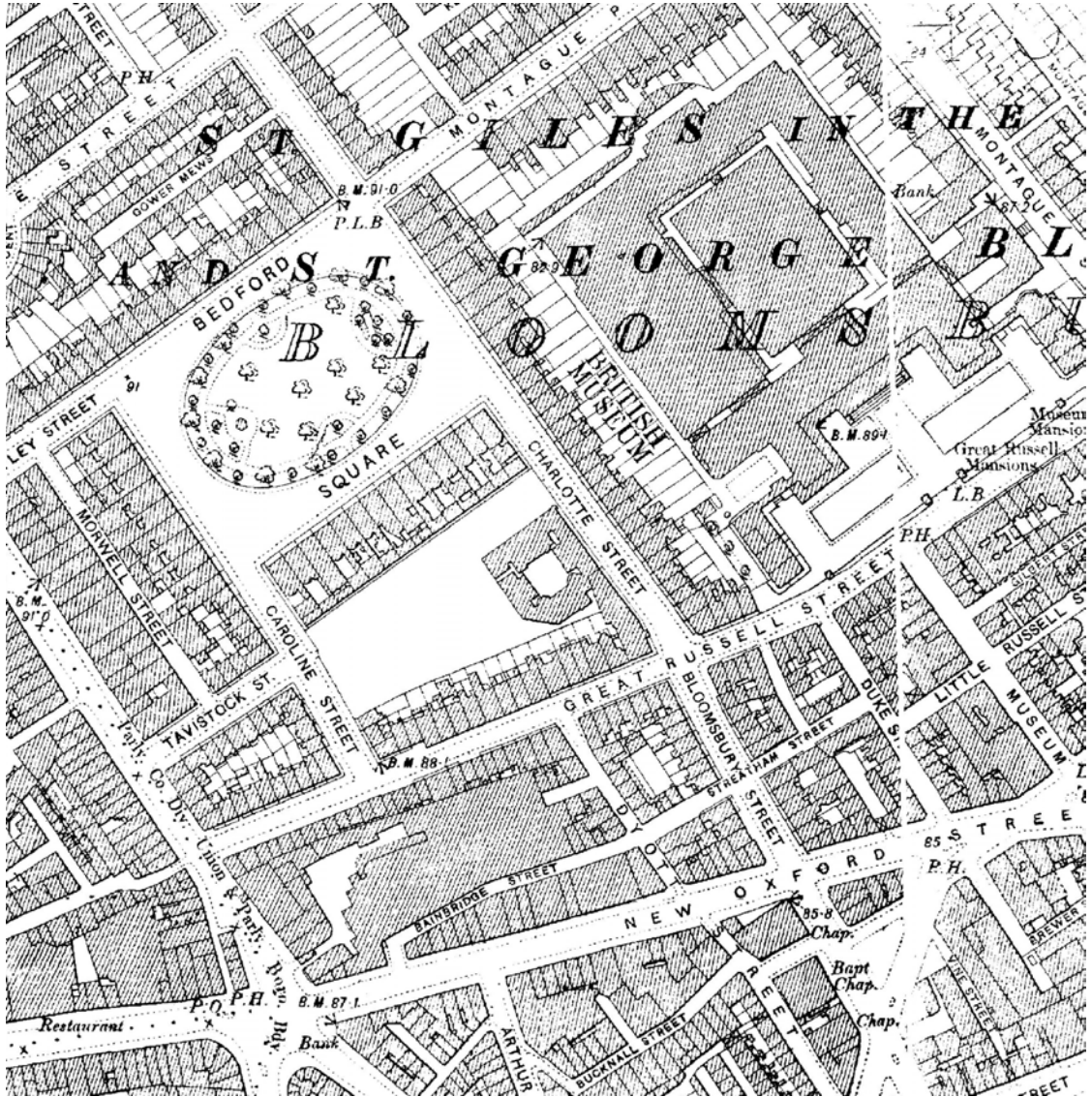


Figure 3: Ordnance Survey, 1896

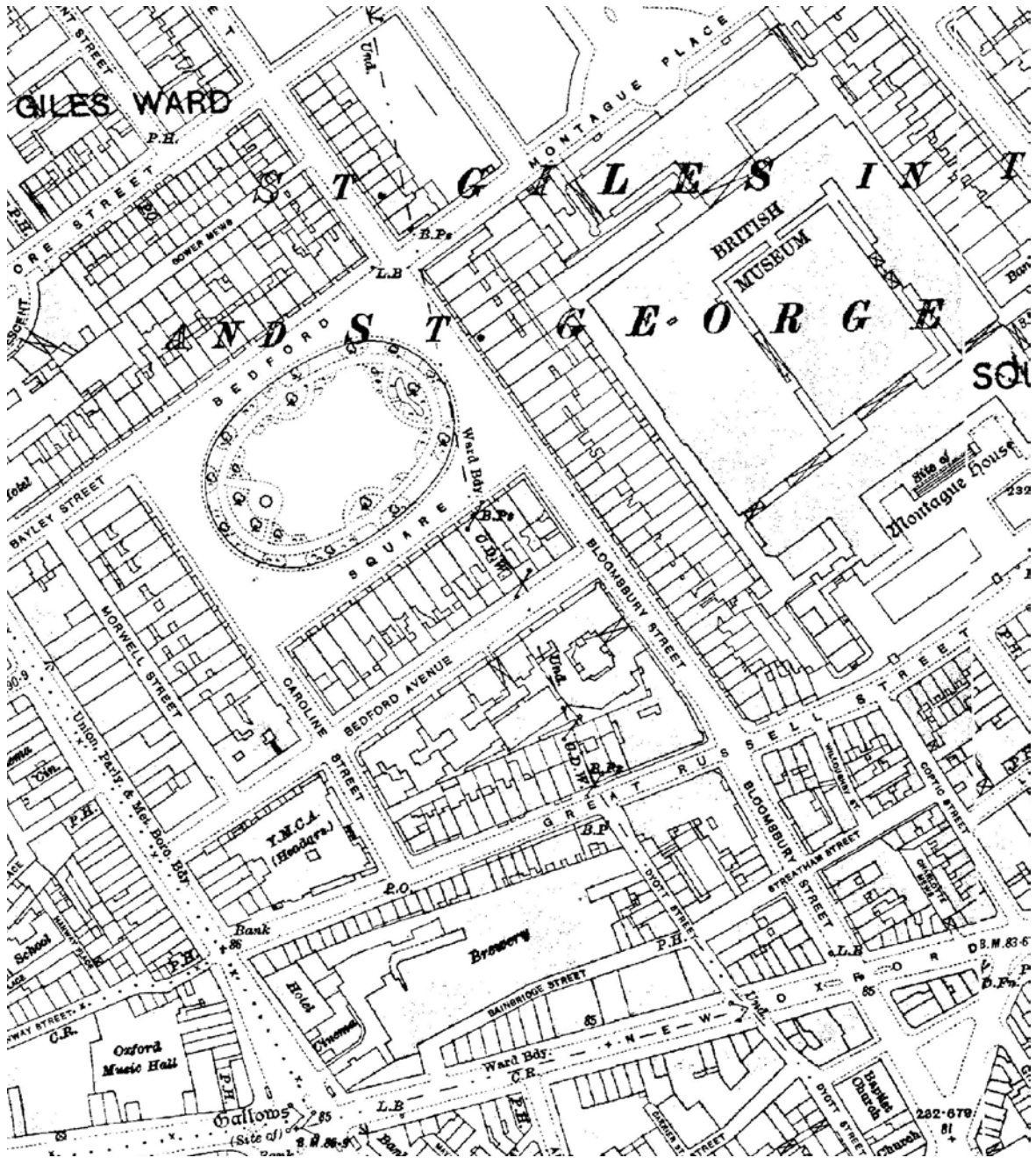


Figure 4: Ordnance Survey, 1916

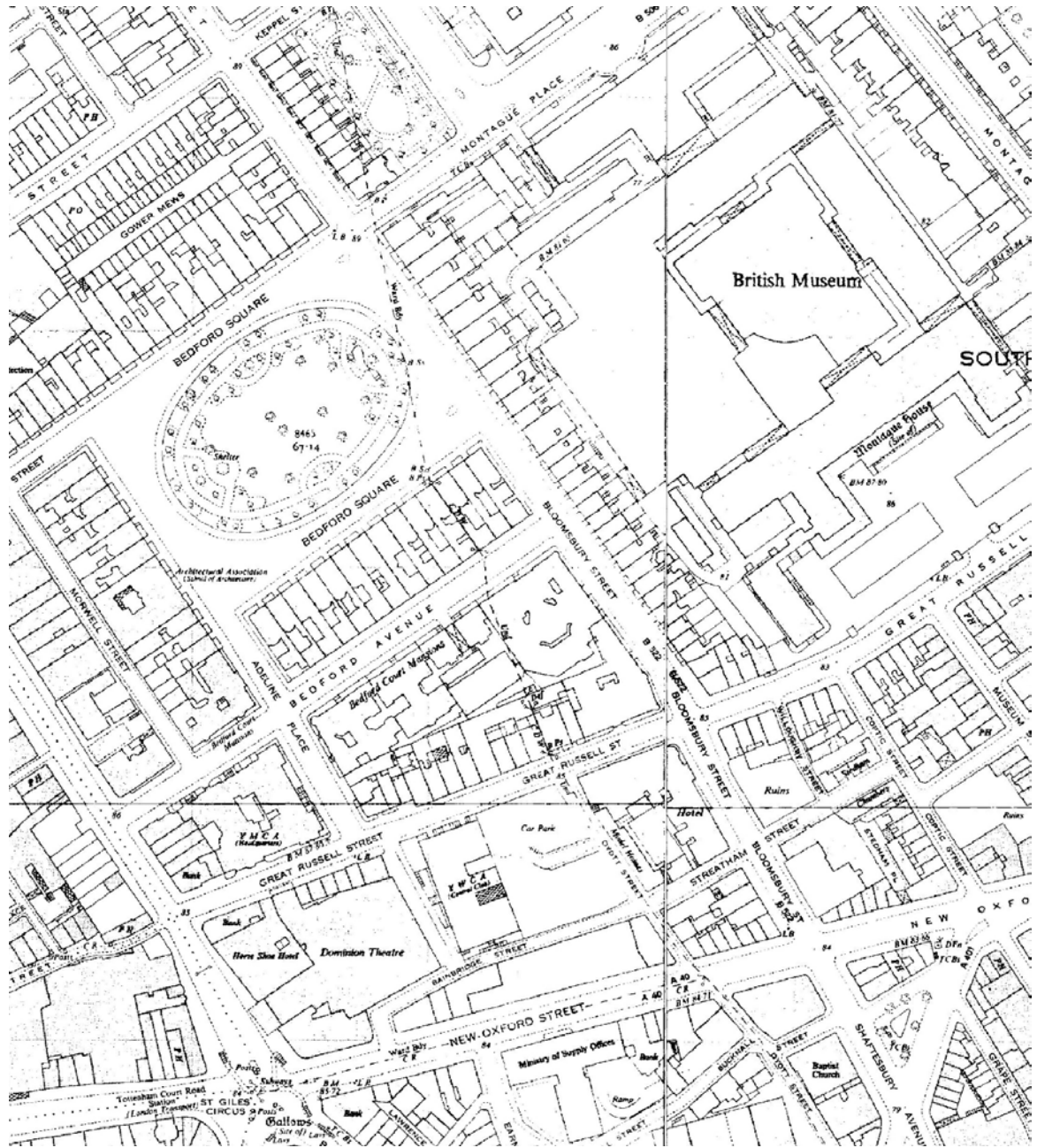


Figure 5: Ordnance Survey, 1953-54



Figure 6: Ordnance Survey, 1965-70

## 21 Bloomsbury Street

- 2.9 21 Bloomsbury Street appears to have been developed at the same time as Bedford Court Mansions, and possibly as part of the same development; the 1896 Ordnance Survey map (Figure 3) suggests that it was the first of the buildings to be built along the south side of Bedford Avenue. The latter were built in the 1890, designed by either Martin & Purchase or Boehmer & Gibbs, depending on the account, or perhaps (according to Pevsner) Allan F.

Vigars. (Figure 7) The building was, for a time, a hotel (Figure 8).

- 2.10 The building was heavily altered in the 1990s (to designs by TP Bennett Architects), with complete replacement of all roof structures and internal structures, with the addition of a roof to an existing lightwell to create an atrium. All south and west facing façades were replaced. The entrance on Bloomsbury Street was altered and that on Bedford Avenue removed. In 2014, a rear extension with a roof terrace was added at second floor level.



Figure 7: 21 Bloomsbury Street in 1914 (© Historic England).



Figure 8: Undated photograph of 21 Bloomsbury Street in hotel use



## **The heritage and townscape context of the site**

### *Introduction*

- 2.11 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. Heritage assets in the vicinity of the site are shown in Figure
- 2.12 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.

### *Conservation area*

- 2.13 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.
- 2.14 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.

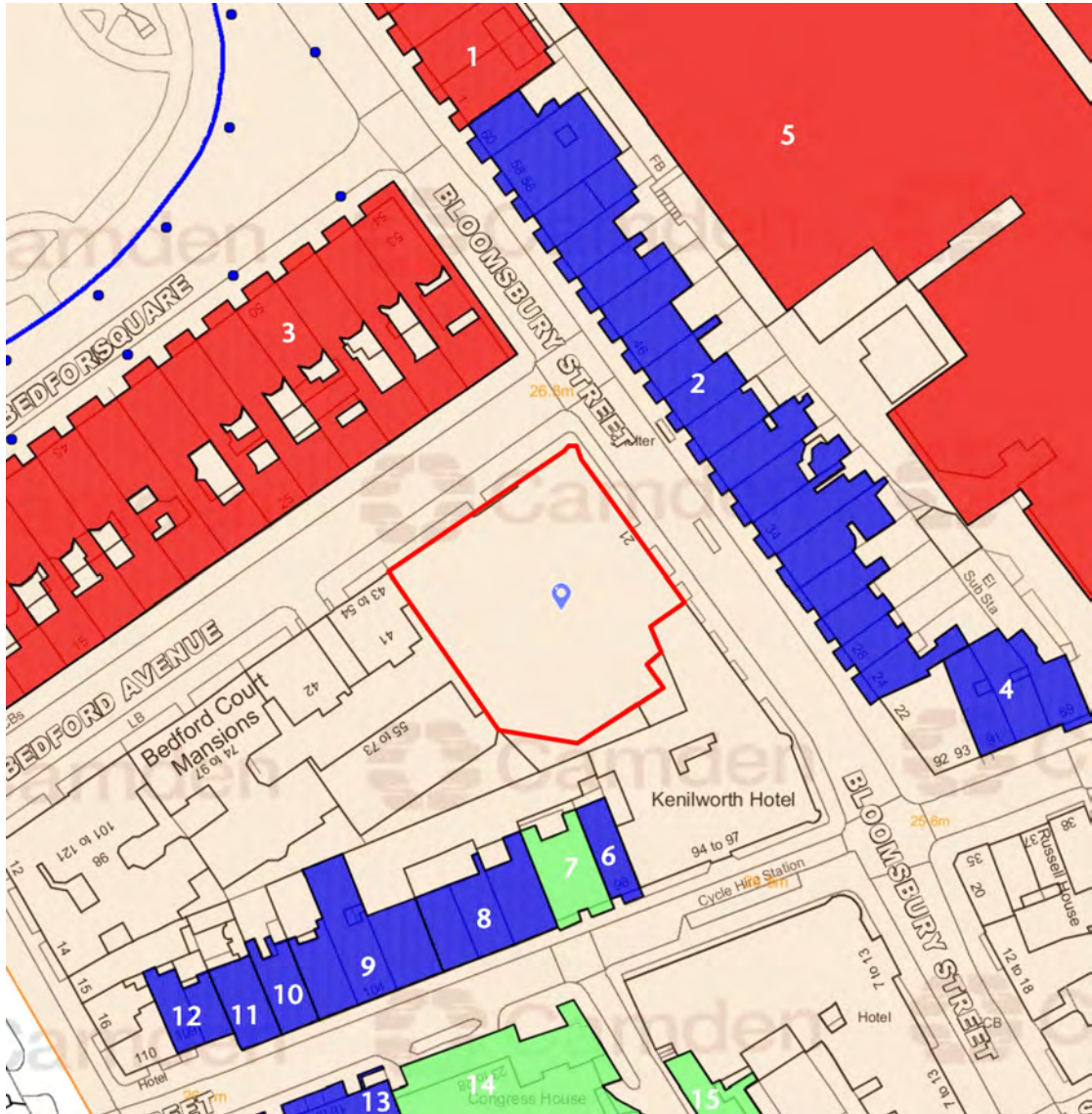


Figure 9: Heritage assets in the vicinity of the site (© the London Borough of Camden)  
 Numbers relate to text below. Red is Grade I, green is Grade II\* and blue is Grade II  
 The Bloomsbury Conservation Area is indicated by brown tone.

- 2.15 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 8: New Oxford Street/High Holborn/Southampton Row.
- 2.16 This sub area is characterised by areas of large-scale, late 19th and early 20th century blocks fronting busy thoroughfares. Development followed the construction of

new routes combined with the widening of earlier streets, thereby cutting through the earlier 17th and 18th century street pattern. The narrow back streets in the sub area reflect the earlier layout. The predominant use is commercial, with a range of shops, banks, offices, hotels and theatres. Residential accommodation generally takes the form of mansion blocks.

- 2.17 21 Bloomsbury Street is identified in the Bloomsbury Conservation Area Appraisal and Management Strategy as making a positive contribution to the conservation area.

*Listed buildings*

- 2.18 There are a number of listed buildings in the vicinity of the site. Figure 9 shows the location of each of these in relation to the site (numbers relate to Figure 9). These are:

1. Nos.1-10 Bedford Square and attached railings (Grade I);
2. Nos.24-60 Bloomsbury Street (Even) and attached railings (Grade II);
3. Nos.40-54 Bedford Square and attached railings (Grade I);
4. 89, 90 and 91 Bloomsbury Street and attached railings (Grade II);
5. The British Museum (Grade I);
6. 98 Great Russell Street and attached railings (Grade II);
7. 99 Great Russell Street and attached railings (Grade II\*);
8. 100, 101 and 102 Great Russell Street (Grade II);
9. 103, 104 and 105 Great Russell Street (Grade II);
10. 106 Great Russell Street (Grade II);
11. 107 Great Russell Street (Grade II);
12. 108 and 109 Great Russell Street (Grade II);

13. Nos.16-22 Great Russell Street (Consecutive) – former Queen Mary Hall and YWCA Central Club and attached railings (Grade II);

14. Congress House (Grade II\*);

15. Parnell House, Dyott Street (Grade II\*).

*Other designated heritage assets*

2.19 The garden of Bedford Square is a Grade II\* registered landscape.

*Non-designated heritage assets*

2.20 There are no locally listed buildings in the vicinity of the site

*Views*

2.21 The site does not lie within any metropolitan or local view corridors.

**Heritage significance**

*Assessing heritage significance: concepts and terminology*

2.22 The listed buildings, the conservation areas and registered landscape are ‘designated heritage assets’, as defined by the National Planning Policy Framework (NPPF). Locally listed buildings or structures can be considered as ‘non-designated heritage assets’.

2.23 ‘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’. 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’.

2.24 ‘Conservation Principles, Policies and Guidance for the sustainable management of the historic environment’ (English Heritage, April 2008) describes a number of ‘heritage values’ that may be present in a ‘significant

place'. These are evidential, historical, aesthetic and communal value.

- 2.25 '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.

*'Historic interest' or 'Historical value' and 'Evidential value'*

- 2.26 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 fields that surrounded 18<sup>th</sup> century London.

- 2.27 21 Bloomsbury Street has evidential and historical significance in representing the Victorian and Edwardian development of this part of Bloomsbury. Its surroundings possess historic significance by virtue of the area's role in the 18<sup>th</sup> and 19<sup>th</sup> century northern expansion of London and the overall development of Bloomsbury as an urban quarter. The area has extensive associations with individuals and institutions, and with cultural, scientific and educational movements and innovations. Alteration, demolition and redevelopment has not entirely removed the ability of the historic built environment to convey the area's historical ethos and the conservation area.

*'Architectural interest', 'artistic interest' or 'aesthetic value'*

- 2.28 The NPPF describes how a building may have 'architectural' and 'artistic interest' in varying degrees. 'Conservation Principles' applies the term 'aesthetic value'.

- 2.29 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’.*

- 2.30 21 Bloomsbury Street is a modest instance of late Victorian development in the area. It retains much of its architectural character, materiality and detailing in its facades to Bloomsbury Street and Bedford Avenue, despite the 1990s changes to the building, but behind these street elevations, the building has no architectural quality of any note.
- 2.31 The building has a strong corner presence at the junction of Bloomsbury Street and Bedford Avenue, and, when viewed with Bedford Court Mansions, forms a group with the consistent and impressive line of buildings on the southern side of Bedford Avenue.
- 2.32 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.

#### **Townscape character and significance**

- 2.33 The townscape significance of the site lies in its location – at a key node on Bloomsbury 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 Bedford Avenue and Bloomsbury Street. The building assist in creating the scale of the western side of Bloomsbury Street and the southern side of Bedford Avenue – at 5/6 storeys these buildings, as well as being in aesthetic contrast with the earlier Georgian terraces around them, are notable for their greater scale. Their largely sheer elevations (notwithstanding bays and modelling) create a powerful sense of street enclosure.

### **Summary**

- 2.34 21 Bloomsbury 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 Victorian architectural design, which survives in the Bloomsbury Street and Bedford Avenue elevations of the building. The building has a strong townscape presence and contributes to its townscape context by its similarity in scale to buildings of the same era in the vicinity.

### **3 The legislative, policy and guidance context**

#### **Introduction**

- 3.1 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.
- 3.2 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**

- 3.3 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act').
- 3.4 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'
- 3.5 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'.
- 3.6 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**

- 3.7 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.<sup>2</sup>.

#### *Design*

- 3.8 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).’*

- 3.9 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;*

---

<sup>2</sup> 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*

- 3.10 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).<sup>3</sup>
- 3.11 Paragraphs 190-193 discuss the responsibilities of the local authority towards plan making and the historic environment.

---

<sup>3</sup> 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.

3.12 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.'*

3.13 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.'*

3.14 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).

3.15 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*

- 3.16 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.’
- 3.17 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.’<sup>4</sup>*
- 3.18 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*

---

<sup>4</sup> 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.'*

- 3.19 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).
- 3.20 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).
- 3.21 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).
- 3.22 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).<sup>5</sup>
- 3.23 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

---

<sup>5</sup> 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).

- 3.24 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).
- 3.25 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'.
- 3.26 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'.<sup>6</sup>*

### **Planning Practice Guidance**

- 3.27 Planning Practice Guidance<sup>7</sup> provides streamlined guidance for the National Planning Policy Framework and the planning system. It includes guidance on matters

---

<sup>6</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

<sup>7</sup> Ministry of Housing, Communities and Local Government, Online: [www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment](http://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.

3.28 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.

#### **Historic England's Planning Advice<sup>8</sup>**

##### *Good Practice Advice*

3.29 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)'.

3.30 These notes are:

- GPA 1: The Historic Environment in Local Plans (2015);
- GPA 2: Managing Significance in Decision-Taking in the Historic Environment (2015);

---

<sup>8</sup> Historic England, *The Planning System*, Online: [historicengland.org.uk/advice/planning/planning-system](https://historicengland.org.uk/advice/planning/planning-system)

- 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*

- 3.31 This note provides guidance regarding the setting of heritage assets and how to assess the effect of change on that setting.
- 3.32 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’.*
- 3.33 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.



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

*Historic England Advice Notes*

3.35 This set of advice notes covers various planning topics in more detail and at a more practical level.<sup>9</sup> The documents most relevant to the proposed scheme are:

3.36 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;

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

3.37 This document<sup>10</sup> has been referred to in Section 3 of this report.

**The London Plan**

3.38 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

3.39 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.

---

<sup>9</sup> Historic England Advice Notes:  
[historicengland.org.uk/advice/planning/planning-system](https://historicengland.org.uk/advice/planning/planning-system)

<sup>10</sup> English Heritage (2008) *Conservation principles, policies and guidance for the sustainable management of the historic environment*.

3.40 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.

3.41 Section C (1) requires that development proposals address ‘Visual Impacts’ as follows:

*a) the views of buildings from different distances:*

*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.'*

3.42 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 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'.*

- 3.43 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**

#### *Planning policy*

- 3.44 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).
- 3.45 Section 7 of the Plan deals with Design and Heritage saying that 'the Council places great importance on preserving the historic environment'.
- 3.46 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.'*

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

3.48 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.'*

3.49 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.'*

3.50 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'.

3.51 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.'*

3.52 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.'*

3.53 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*

3.54 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.'*

3.55 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.'*



## **4 The proposed development and its effect**

### **Introduction**

- 4.1 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.
- 4.2 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.
- 4.3 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 proposed scheme**

- 4.4 The proposed development seeks to increase and improve the office accommodation at 21 Bloomsbury Street, maximising the site for employment use whilst extending the usable life of the building by providing high-quality office space to meet modern occupational demands. In terms of potential heritage and townscape effects, the key aspect of the proposed development is the proposal to extend the upper floors within the existing massing profile, to provide office accommodation and accessible amenity space. This will permit the consolidation of the roof profile, an improvement in the relationship with Bedford Court Mansions and an improvement in the visible massing in views from within the conservation area and from Bedford Square.
- 4.5 It is proposed to replace 1990s steel windows to improve thermal performance, air tightness, U-values and G-values, and acoustic performance. The existing unsightly plant and atrium/core roof will be replaced. The new roofscape will include additional dormer windows,

replicating the double mansard on the neighbouring mansions blocks, and replacement of existing fake 1990s chimney stacks. An accessible rooftop garden will be provided for all building users.

#### **Effect on heritage and townscape significance**

- 4.6 The design of the proposed scheme 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.
- 4.7 The key heritage and townscape effects of the proposed scheme are confined to its elevations to Bloomsbury Street and Bedford Avenue. It is in this context that the special architectural or historic interest of listed buildings and the character and appearance of the Bloomsbury Conservation Area has the potential to be affected by proposals for 21 Bloomsbury Street.
- 4.8 Whilst visibility does not automatically equate to heritage or townscape harm - or even a discernible or measurable effect - the proposals may have a visual effect upon the experience of a heritage asset. The Design & Access Statement contains a series of accurate visual representations, prepared by Miller Hare. The proposed scheme has been tested for its visual and heritage effects in a number of views from Bloomsbury Street and Bedford Square. It is clear that the proposed scheme represents an improvement over the present situation in terms of the existing roofscape. The existing plant and glazed atrium roof will be removed from view from a series of locations. The addition of dormers will have a very minimal but wholly fitting effect.
- 4.9 The replacement of windows and renewal of entrances will improve the appearance of the building, and is based, as shown in the Design & Access Statement, on an assessment of the existing fenestration of the building, original exemplars on Bedford Court Mansions and a

consideration of the balance between historical authenticity and contemporary requirements.

- 4.10 However, the heritage and townscape effects of the proposed development are, in fact, minimal. Taken individually or considered cumulatively, the various aspects of the proposed scheme will have little effect on the heritage and townscape significance analysed earlier in this report. No major change is proposed to the building – it is not the case, for instance, that visible and contrasting new floors are proposed for the buildings. Once the works are completed 21 Bloomsbury Street will remain largely as it is experienced in heritage and townscape now.

#### **Summary and conclusions**

- 4.11 The conclusion of our 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 either neutral (by not being visible from the setting of nearby listed buildings or within the sub-area of the conservation area) or positive, removing from view what should not be seen. Their heritage significance is safeguarded, sustained and enhanced. The character and appearance of the conservation area will be preserved and enhanced – the positive contribution made by 21 Bloomsbury Street to the Bloomsbury Conservation Area will be sustained for the long term.
- 4.12 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.

- 4.13 The proposed development will sustain the townscape significance and quality of 21 Bloomsbury Street, and improve the relationship between the building and the street by improving its entrances.
- 4.14 The proposals will preserve the setting of the Bedford Square garden registered landscape

## 5 Compliance with legislation, policy and guidance

### Introduction

- 5.1 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

- 5.2 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.
- 5.3 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.
- 5.4 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*

- 5.5 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*

- 5.6 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. As outlined in Section 3, 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.
- 5.7 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 substantial harm. Similarly, we also do not believe that any ‘less than substantial harm’ is caused (paragraph 202 of the NPPF) to listed buildings and conservation areas. The reasons for this conclusion

are set out in the previous section, and can be summarised as follows: a very small degree of 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*

- 5.8 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).
- 5.9 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, 202 and 203 of the National Planning Policy Framework are therefore not engaged in consideration of the proposed scheme.
- 5.10 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’.
- 5.11 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**

5.12 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 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 2.

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

This is undertaken in Section 4 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**

5.13 The proposed scheme would be consistent with the London Plan and fully complies with its Design (Chapter 3) and Heritage (Chapter 7) policies.



- 5.14 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.'*
- 5.15 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**

- 5.16 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.
- 5.17 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.

## 6 Summary and conclusions

- 6.1 This report, at Section 2, sets out a brief history of the area, identifies the heritage assets in the vicinity, and assesses heritage and townscape significance. Section 3 identifies the legislative, policy and guidance context for the development. The proposed scheme and its effect are assessed in Sections 5.
- 6.2 The conclusion of our 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 either neutral (by not being visible from the setting of nearby listed buildings or within the sub-area of the conservation area) or positive, removing from view what should not be seen. The heritage significance of these assets is safeguarded, sustained and enhanced. The character and appearance of the conservation area will be preserved and enhanced – the positive contribution made by 21 Bloomsbury Street to the Bloomsbury Conservation Area will be sustained for the long term. The proposals will preserve the setting of the Bedford Square garden registered landscape.
- 6.3 The proposed development will sustain the townscape significance and quality of 21 Bloomsbury Street, and improve the relationship between the building and the street by improving its entrances.
- 6.4 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 listed buildings, and thus their special architectural or historic interest, will be preserved.
- 6.5 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.

KMHeritage

[www.kmheritage.com](http://www.kmheritage.com)

© 2022