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**Sent via planning portal only**

Dear Sir/Madam

## **LISTED BUILDING CONSENT**

**MINOR INTERNAL ALTERATIONS – F BLOCK LEVELS 2 & 5**  
**MINOR EXTERNAL ALTERATIONS – F BLOCK LEVEL 2**

**BMA HOUSE, 13 TAVISTOCK SQUARE, LONDON, WC1H 9JP**

Please accept this covering letter as an accompaniment to this listed building consent application for minor works at the British Medical Association (BMA) complex. This letter provides a summary of the site and the proposed development and associated justification for the works.

### **The site**

The site is located on the north-east side of Tavistock Square (A4200) and comprises a five storey, grade II listed building occupied by the British Medical Association. The site is located within the Bloomsbury Conservation Area and the surrounding context is historically and architecturally sensitive, comprising a number of Grade I, Grade II and Grade II\* listed buildings.

### **The Proposal**

The BMA are gradually returning to their Headquarters in specific locations post pandemic and occupying specific parts of the estate.

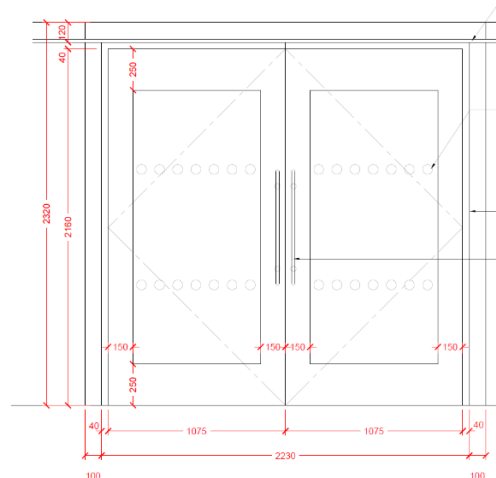
The proposals the subject of this application include minor internal alterations to facilitate the fit out of levels 2 and 5 (Block F). This includes various de minimis works (painting, reorganisation of space, lighting) but no changes are proposed to the lawful use of the site as office space.

At Level 5, the original layout will be retained with the exception of a flimsy plasterboard wall and modern low-cost door that didn't have permission originally.

The proposals will incorporate the loss of a timber door at this level which is of no historic merit (see image below) and the reason for the alteration is to secure compliance with access, egress, DDA and Fire regulations.



Existing door to be removed



Proposed replacement door

At level 2, the application proposes the addition of a glass wall to convert an open plan to a meeting room / corridor.

At fourth floor level, block G is a location where staff have returned to the existing layout which has been refreshed with new carpet tiles, a lick of paint and an upgrade of the grid lighting to energy efficient LED and a replacement of the old blinds. The Layout and configuration has not been changed.

## **Planning Policy**

### **National Planning Policy**

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three specific strands – economic, environmental and social. The following sections are relevant to the consideration of this application; Section 16 (conserving and enhancing the historic environment).

### **Local Planning Policy**

For the purposes of this application, the adopted development plan for the London Borough of Camden comprises the London Plan (2021), the Camden Local Plan (2017) and Camden Planning Guidance Documents (CPG). Also of relevance is the Bloomsbury Conservation Area Appraisal and Management Strategy (2011). The following policies are considered relevant to the consideration and determination of this application:

### **London Plan (LP) 2021**

- Policy D4 – Delivering Good Design

- Policy HC1 – Heritage Conservation and Growth

Camden Local Plan (CLP) 2017

- Policy D1 – Design
- Policy D2 – Heritage

Camden Planning Guidance (CPG) & other guidance

- Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

**Planning Assessment**

***Principle of development:***

Law requires that applications for planning permission and listed building consent must be determined in accordance with the development plan, unless material considerations indicate otherwise.

The site comprises a building in active office use and no changes are proposed to the established use class. In such locations, there are no development plan or national planning policies that restrict the alteration of properties in principle, subject to the consideration of all other detailed matters.

***Design and visual impacts:***

Section 12 of the NPPF refers to well-designed places. Paragraph 130 (c) states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

Camden Local Plan Policy D1 requires development to be of the highest architectural and urban design quality and have particular regard to design and visual impact and to the context within which it is placed, and the contribution it makes to the landscape qualities of the area. The aim of this policy is reflected in London Plan Policy D4 (Good Design).

In the main, the proposed works are all internal. Where external works are proposed, these will be limited to spaces not visible in the public domain and in any case, represent development expected within the confines of large-scale office space. This aligns with the competing local plan objective of building a strong competitive economy and creates no visual harm or, by proxy, no harm to the character and appearance of the area in accordance with the development plan.

***Heritage Impact:***

Case law dictates that decision makers are required to give great weight to any harm to the significance of a heritage asset and how this should be applied is set out in section 16 of the NPPF. CLP Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and

diverse heritage assets and their settings, including conservation areas. These aims are further reflected in London Plan Policy HC1 (Heritage Conservation and Growth).

In terms of the heritage asset itself, BMA House is a grade II listed building. The memorial fountain in the central courtyard is grade II\* listed. The list description for the building sets out that the entire site is grade II listed. The list description notes that the interior is altered and now 'modern offices'.

The summary of the site's importance is given as:

*A fine, albeit incomplete, example of Lutyens' earlier work in the neo-classical idiom. The later additions by Wontner-Smith and Wood, which form the majority of the building, are dignified and well-detailed; the whole ensemble representing a distinguished and coherent complex of multi-phase buildings. Of historic interest as the headquarters of the BMA since 1925.*

The list description identifies several areas where value can be attributed to the existing building:

- An example of Lutyens' earlier work albeit incomplete;
- The high architectural quality of the later Wontner-Smith and Wood additions;
- While individual elements have value, the site as a whole is a distinguished and coherent complex; and,
- The association with the BMA since 1925

The building's list description notes that '*the interior is considerably altered*'. The relatively recent listing of the building has meant that various internal and external alterations have taken place prior to listing that were obviously undertaken outside of the listed building consent regime. This has resulted in the loss of some of the building's internal features and character. Alteration has left the interior of the building with less of a robust 1930s character than its exterior and as a result, there are clear opportunities for enhancement, particularly in the context of the need to ensure established office space is suitable for modern requirements.

The existing building also forms part of the Bloomsbury Conservation Area. It is located within Sub Area 6 of the conservation area: Bloomsbury Square/Russell Square/Tavistock Square. Any proposed alterations, particularly external alterations, should take into account their effect on the character and appearance of the conservation area.

Both F and G blocks are already significantly altered and the proposed internal works will not erode either original plan form or building fabric. The external alterations would be largely de minimis in the context of the site and building itself.

The proposals are intended to be entirely respectful of the principal listed building. The proposals see a minor adaptation of an altered element of the building where there is scope for further sympathetic change and alteration. Similarly, the proposals would not cause harm to the character and appearance of the conservation area as a designated heritage asset. The proposed scheme is therefore considered to comply with national and local historic environment policy for these reasons and for those set out above.

However, notwithstanding the above, should '*less than substantial*' harm be identified, that very limited harm would be required to be considered against public benefits that result from the proposed development. Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as set out in the NPPF.

The lawful and established use of the application site is commercial and this use defines the character of the immediate area. Any departure from the established use will therefore more than likely adversely affect the setting of this part of the conservation area. Commercial use therefore forms the optimum viable use of the site, both publicly and privately.

Sustaining heritage assets in the long term often requires an incentive for their active conservation, particularly given that most, including the application site, are in private ownership. Putting heritage assets to a viable use is more likely therefore to lead to the investment in their maintenance necessary for their long-term conservation.

In this case the proposed development facilitates the best use of the property, maintaining its active use and thereby its optimum viable use. This has been held to represent, albeit modestly, a public benefit.

Whilst public benefit is stated, the true test of the NPPF is one of balance. In this instance the public benefits are considered sufficient to ensure compliance with the NPPF in the context of the harm generated which is considered to be 'nil' as discussed above.

In terms of the balance required by paragraph 197 of the NPPF, it is clear that, in light of the above, the public benefits of the proposal would outweigh any '*less than substantial*' harm to the significance of the heritage assets that may be identified.

### **Summary**

As set out in this letter, the internal works are considered to have an acceptable impact on the character and appearance of the listed building and the surrounding Conservation area. The development is in accordance with the relevant Development Plan policies, and it is therefore respectfully requested that planning permission and listed building consent are granted.

I trust this letter and the enclosed documents provide you with sufficient information to determine the applications but if you require any points of clarification or have any questions, please do not hesitate to contact me.

Yours faithfully

**Allen Sacbucker**  
**Associate**  
**SM Planning**