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Our ref: 2023/1136/PRE
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Dear Christopher,

Re: 88 Tavistock Place, London, WC1H 9RS

Thank you for submitting the above pre-planning application enquiry on 15/03/2023 for a first-floor extension along the southwestern boundary of the site.

The required fee of £1,138.09 was received on 31/03/2023. A site visit and meeting was held on 3 May 2023.

Site constraints

- Bloomsbury Conservation Area
- Article 4 – Basements

Relevant policies and guidance

[National Planning Policy Framework 2021](#)

[The London Plan 2021](#)

[Camden Local Plan 2017](#)

A1 Managing the impact of development
D1 Design
D2 Heritage

Camden Planning Guidance

Amenity (2021)
Design (2021)
Home improvements (2021)
Basements (2021)

Belsize Conservation Area Appraisal and Management Strategy 2011

Site description

The subject site accommodates the Lumen United Reformed Church and Community Centre, which comprises the main church building and a single-story glazed entrance, which links to the adjoining 'United Reform Church House building' (at 86 Tavistock Place). The adjacent building is part of the church complex and is understood to be principally used as offices, but accommodates some flats (rented out by the Church) on the uppermost floor.

The church and community centre building are located in the Bloomsbury Conservation Area and the building identified as a Positive Contributor to the conservation area.

The building is situated on the southwest side of Regent Square between a Grade II listed Georgian terrace (No. 1130373) to the east, and the United Reform Church House building' 1960s era building to the west.

In February 1945, the original 1827 William Tite designed Church on the site suffered extensive bomb damage and was later demolished. The existing Regent Square United Reformed Church was built in 1965 a red brick materiality and with a large vertical feature window and louvered tower detail. In 2007 the Church and neighbouring 1960s office block were linked with a single-story glazed entrance annex by Theis and Khan Architects, for which the project received a RIBA London Regional Award in 2009.

Relevant Planning History

2007/0979/P - Erection of single storey ground floor extension to create café and community space for uses ancillary to the main church use, and various external alterations. **Granted 20/04/2007**

Proposal

The proposed works include a first-floor extension to the existing building, being an upwards extension to the existing single-storey glazed entrance extension between the Church, and office building at the corner of Tavistock Place and Wakefield Street.

Assessment

The planning considerations material to the determination of this application are as follows:

- Heritage and design
- Amenity

Heritage and design

Summary of Significance

The significance of the Conservation Area (Sub Area 12: Coram's Fields/Brunswick Centre) and the subject building is derived from the architectural treatment of the Church, where its high quality, distinctive modern Scandinavian design has been judged as making a positive contribution to the character of the Area. The Church's prominent position at the southwest corner of Regent Square Gardens and more contemporary style and form adds verticality and variation in the Area while maintaining a consistency in the building line and materiality.

Regarding the site and subject building, the Bloomsbury Conservation Area Appraisal specifically notes:

No. 86 Tavistock Place is a solid early 1960s red brick office building, United Reformed Church House, which has recently been sensitively linked to No. 88, the Lumen United Reformed Church, a contemporaneous red brick building with a tower and double-height feature window which introduces a vertical element on the south-west side of Regent Square.

The glazed entrance link maintains the continuous building line between the Georgian terrace, Church and office building, allowing the main body of the church to maintain its prominence. The lower height of the single-story link allows the full three-dimensional form and length of the western side elevation and clerestory journey of the modern Scandinavian influenced Church to be fully appreciated. The Officer Delegated Report for the existing approved (RIBA awarded) 2007 linking side extensions stated that:

The design approach is based on the creation of a series of new single storey spaces that flank the east and west sides of the existing church building... It is considered that the proposed extensions do not visually compete with the form of the church and as such are acceptable.

The side extensions single-story height and massing was therefore considered as a key contributing factor in the overall supportability of the scheme, where it allows the architectural qualities and form of the 1960s Church to remain legible. The proposed design will increase the height of this transitional linking space, further infilling the gap between the church and office building and obscuring in-part the west side elevation and joinery.

There are therefore significant concerns that any additional height to this linking element will detract from the architectural qualities of the Church, with the vertical impact of the double-height feature window that presents to the southwest side of Regent Square Gardens diminished, and the west side elevation and clerestory joinery obscured. You are therefore encouraged to explore alternative locations for the extension - for example, could the second storey be located at the rear of the site above Community Space 1 (G12), or setback in line with the second clerestory window/angled rooflight Glazing. This would maintain more visibility of the Churches side elevation and three dimensionality.

To demonstrate how the additional height and associated bulk and mass will present in the streetscape and against the Church, it is recommended that perspective images be included as part of the application drawing package.

The public benefits of the scheme should also be clearly outlined in the application's supporting documentation so that they may be considered in balance with the harm posed to the positively contributing building and the contribution that it makes to the Tavistock Place streetscape.

Materiality

The proposed curtain wall glazed materiality of the extension would align with the existing material treatment of the link and be considered appropriate, maintaining lightweight and transparent nature of the structure.

Front Entrance Steps

At the site meeting it was also raised whether the removal of the front entrance steps due to water egress issues would be supportable. Retention of these entrance steps and blind-door were key design considerations in the supportability of the 2007 scheme. These elements serve to reference the traditional entrance to the Church and their removal would distort the original form of the 1960s Church. The removal of these key architectural features would not be supportable and a maintenance and repair approach to addressing the water egress (repointing the mortar joints) should instead be adopted.

Consultation

Council Officers encourage consultation with Theis and Khan Architects, who designed the 2007 RIBA award winning scheme of the Church, prior to submission of an application. This may avoid their commenting/objecting to any proposed alterations at consultation stage.

Amenity (neighbouring occupiers)

The proposal does not introduce any amenity concerns for occupiers of adjacent buildings.

While the first floor extension may impact on sunlight and daylight levels to the lower floor offices at 86 Tavistock Place (understood to be owned by the applicant), this is considered to be acceptable as any reduction in sunlight/daylight is expected to be minimal and occur over non-residential space.

Overall, any external amenity effects associated with the proposed works are considered acceptable.

Transport

The proposed additional floor space would likely trigger the need for additional cycle parking. It is understood there is existing cycle parking at the site, which may be adequate in meeting the total number of cycle spaces required at the site (for the existing and proposed floor space) under the London Plan.

Where additional cycle parking is required, the application material should detail where the cycle parking would be located and provide detail of the cycle parking facilities. Cycle parking located at the rear of the site, where the existing cycle parking is understood to be located, would likely be considered acceptable given constraints in locating cycle parking at the front of the site off Tavistock Place.

Please refer to the London Plan and Camden Transport CPG for further guidance.

<https://www.london.gov.uk/programmes-strategies/planning/london-plan/past-versions-and-alterations-london-plan/london-plan-2016/london-plan-chapter-six-londons-transport-2>

<https://www.camden.gov.uk/documents/20142/4823269/Transport+CPG+Jan+2021.pdf/ac4da461-7642-d092-d989-6c876be75414?t=1611758999226>

Construction

Whilst the proposal would involve the construction of a large extension, it is likely the works can take place without the requirement for a Construction Management Plan (CMP). The single yellow lines in front of the site can be used for deliveries and the removal of waste from the site.

Community Infrastructure Levy (CIL)

The Community Infrastructure Levy (CIL) is a charge collected from new developments, which funds public facilities.

The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling.

Some churches would potentially be entitled to CIL relief as they are registered charities. However the applicant would have to apply for this relief after they have been granted planning permission. Given the nature of the development the proposal could potentially be CIL liable.

Conclusion

The proposed provision of additional office space in a first floor level addition to the central link between the Church and office building is in principle supportable. However, the location of this additional bulk, massing and height, and the harm posed to the architectural form of the positively contributing building, would need to be adequately justified and mitigated through detailed design. You are encouraged to explore other locations for the additional massing to allow for the main body of the church to retain its prominence.

Any project arising will be assessed according to policies D1 and D2 of Camden's Local Plan of 2017, and section 72 of the NPPF. This, among other things, requires Camden to take account of the desirability of sustaining and enhancing the significance of heritage assets; and to weigh harm caused to such assets by development against public benefits accruing therefrom, including securing the asset's optimum viable use.

The proposed works are considered acceptable in terms of amenity effects.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Brendan Versluys on **020 7974 3202**.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Brendan Versluys

**Senior Planning Officer
Planning Solutions Team**