



18 December 2023

2023/4791/P

London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

### **Formal objection to 2023/4791/P at land to the west side of Argyle Square London WC1H 8AS.**

This objection is submitted on behalf of the Bloomsbury Conservation Area Advisory Committee. We would like to object to the above application on the grounds of causing unacceptable harm to the significance of the surrounding listed buildings and the Bloomsbury Conservation Area.

#### **Site and Local Context**

Argyle Square is located within the Bloomsbury Conservation Area and is one of London's classic squares built in the Georgian tradition. The tree-lined garden square is surrounded by formal terraces of restrained and elegant architecture, that is typical of this period. The terraces are modest examples of the grander squares that are found south of the site.

According to the Bloomsbury Conservation Area appraisal and management strategy, 'the architectural and historic interest of this area is reflected in the fact that the majority of the buildings are listed.' Apart from 45-47 Argyle Square, all of the terraced buildings on the square are nationally listed.

#### **Impact of proposed welfare cabins**

The proposed welfare cabins were installed on the 6<sup>th</sup> November 2023.

We are particularly concerned with the detrimental impact of the welfare cabins on the setting and amenity of the surrounding listed buildings. Through liaison with the Friends of Argyle Square, it has come to our attention that the existing and proposed welfare cabins cause an actionable right of light injury to seven buildings at 36-42 Argyle Square. This clearly demonstrates a loss of amenity to the listed buildings.

The welfare cabins harm the significance of the CA through blocking long views throughout the square, including views of and from the terrace of Grade II listed buildings 36-42 Argyle Square.

## **Relevant Planning Policy**

Policy D2 Heritage of the Camden Local Plan 2017: *'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.'* This is a position corroborated by the NPPF. Although the redevelopment of Belgrove House application ref.no: 2020/3881/P was found to have public benefit that outweighed the heritage harm. The same cannot be concluded for this application. There is no public benefit attached to this application that outweighs the harm to the setting and amenity of the listed buildings and the significance of the Bloomsbury CA. The proposed temporary nature of this proposal does not exclude the application's obligation to comply with national and local planning policy.

According to Camden and the NPPF, a heritage statement is required when an application affects the setting of a listed building or a conservation area. No heritage statement is included with this application.

## **Conclusion**

We believe that the proposal should be considered inconsistent with the statutory duty to preserve and enhance the special interest of Bloomsbury CA, and to preserve and enhance the setting of the nationally listed buildings. Therefore, we recommend that this application is refused, and enforcement action pursued.

## **Bloomsbury Conservation Areas**

*Advisory Committee*