

Townscape Impact Assessment: View 3

Existing

This viewpoint is located on the central path in the southern half of Tavistock Square, perpendicular to Tavis House's front elevation. Tavis House is the prominent background feature in this view, with the public garden of Tavistock Square and its mature trees and vegetation prominent in the foreground. The lower levels of the Tavis House, including the entrance bays, are clearly visible in this view though the upper levels of its frontage are well-screened by the mature trees. The visibility of these upper levels as seen from View 3 will change throughout the year as trees grow and shed leaves.

Approved

The proposed changes to the entrance bay will be clearly visible in View 3. The new entrance represents a high quality and contextual alteration that maintains and improves the character appearance of Tavis House's front elevation and its contribution to the Tavistock Square street-scene. The proposed rooftop pavilion, pergola and plant enclosure would also be partially visible in View 3 though partially obscured by trees. The centralised location of the proposed pavilion and pergola, aligning with the central bays of the Tavis House frontage, and the overall quality of their architecture, ensure they will read as beneficial additions in the townscape that maintain and enhance the significance of affected heritage assets and result in an appropriate silhouette.

Section 73 Amendments

With continuation of the proposed enhancements to the entrance the primary variation in massing and appearance terms is the rooftop (ninth floor) pop up. Its central position would maintain the symmetry and its architectural style and materiality would sit comfortably and read as an integral part of the host architecture. Any perception of a larger footprint is mitigated by it remaining a set back storey and its overall height having been reduced when compared to the approved design. The effect on townscape character would be neutral.



Townscape Impact Assessment: View 4

Existing

View 4 is located at the junction of Tavistock Square and Woburn Place and looks north towards the front and side elevations of Tavis House, which dominates the view. Marginal views east along Tavistock Place and north up Tavistock Square are possible from View 4 and show the variation in townscape around Tavis House. The stepped form of Tavis House's upper levels are clearly legible. The front elevation of Mary Ward House, listed Grade I, is visible to the right-hand side of Tavis House.

Approved

Changes to the front and side elevations and roof would be visible in View 4 though the magnitude of this change is minor, of high architectural quality and is appropriate for the context. The projecting and articulated forms seen in the central seven bays of the front elevation would be carried up to roof level in the form of the new pergola, cornice and railings. The new entrances to the front and side elevation are well considered, high quality alterations that would improve the street-level appearance of Tavis House. The setting of Mary Ward House as it is experienced in View 4 is not affected.

Section 73 Amendments

The proposed amendments would not alter the previous assessment (see above). The magnitude of change remains minor and the nature of changes and any visibility of them is appropriate to the architecture of the host building and the wider townscape character. There would be no adverse effect on the significance of heritage assets.



Townscape Impact Assessment: View 5

Existing

This view looks north-west from the south side of Tavistock Place towards the south and return elevations of Tavis House, with the subservient rear elevation partially visible in the background. Tavistock Square is also visible to the left-hand side. The gap between Tavis House and Mary Ward House is clearly defined here and it acts as an important 'break' between the varied townscapes of Tavistock Place and Tavistock Square.

Approved

Proposed changes to the south and return elevations are clearly visible. Roof-level changes and the proposed rear infill extension would also be visible but to a lesser degree. The magnitude and visual impact of these changes is minor - the increased massing at eighth floor level is comparatively small and not readily apparent in View 5, whilst the new windows and entrance to the south and return elevations would read as a natural continuation of Tavis House's existing fenestrative arrangement. The rear infill extension is partially obscured in View 5; what would be visible is of high architectural quality that would not disrupt and instead enhances appreciation of Tavis House's presence in the townscape and the setting and significance of the adjacent Mary Ward House.

Section 73 Amendments

In this view the proposed amended scheme presents less change than the approved scheme. The rear blind elevation and overall form of the existing building would remain. The amended design of the proposed rear infill extension would be partially obscured by the tree and adjacent Mary Ward House with glimpsed views revealing a façade of high architectural quality that would enhance appreciation of Tavis House's presence in the townscape and result in an appropriate backdrop for the Mary Ward House.



Existing



Approved



Proposed

Townscape Impact Assessment: Verified View 1

Existing

Verified View 1 is located on the opposite side of Tavistock Square to the west of Tavis House. The forms and details that comprise the front elevation and the rooftop access structure are clearly legible in this view. In this view Tavis House is experienced as part of a townscape comprising other large multi-plot developments that surround Tavistock Square, though smaller-scale buildings are evident in marginal views east down Tavistock Place. Verified View 2 is well screened by the Trees and vegetation located in Tavistock Square, becoming almost entirely obscured during summer months when trees are in leaf.

Approved

Changes to the front elevation and rooftop would be visible in Verified View 1. The proposed entrance changes are of high architectural quality that preserves and enhances Tavis Houses presence within the townscape of Tavistock Square. Similarly the rooftop changes respond to the form and style of Tavis House and represent considered and contextual additions of high architectural quality. The extent of visual change will be dependent on the time of year: during summer months Tavis House, as seen in Verified View 1, will be almost entirely screened by the mature trees and vegetation located in Tavistock Square, become partially visible again during autumn and winter months. The proposed rooftop extension would read as part of the central axis composition of the frontage and result in an interesting and well composed silhouette.

Section 73 Amendments

There has been no notable changes within the context and the view would remain heavily filtered by trees, with seasonal variation. The primary difference from the approved is the form and appearance of the proposed ninth floor. Its central positioning would maintain architectural symmetry and appropriate continuation of the established architectural style and materiality would minimise any perceivable effects on townscape or vary the building's contribution to the conservation area. Any effect on townscape character would be neutral.



Townscape Impact Assessment: Verified View 2

Existing

The viewpoint is located on the south side of Tavistock Place at its junction with Herbrand Street and looks west towards Tavistock Square. Mary Ward House, listed Grade I, is the dominant feature in the foreground whilst Tavis House and Tavistock Square beyond occupy the background. Tavis House's stepped form and greater scale and massing is clearly legible as a backdrop to Mary Ward House. Tavis House's lower quality elements, namely the subservient rear elevation and rooftop access structure, are also present in this view.

Approved

The magnitude of visible change is greater than in Verified View 1 and other views towards the frontage, with proposed openings to the return elevation, the proposed rear infill extension and proposed rooftop pavilion all clearly visible. The only perceivable change in massing relates to the rooftop pavilion though its location, style and scale are sensitively designed and relate well to the mass of the host building and wider context and would not disrupt the value of the building and townscape as experienced from this view point. Similarly the proposed windows and extensions are high quality and would form appropriate and sensitive additions that maintain and enhance the contribution Tavis House makes to the townscape and to the setting and significance of the adjacent Mary Ward House.

Section 73 Amendments

The omission of new windows in the blind rear return along Tavistock Place would result in no perceived change to the primary contributing and visible elements of Tavis House within the setting of the Mary Ward building. Only the upper parts of the proposed rear infill would be visible, namely the scalloped plant screen and rear parts of the ninth floor. As with the Mary Ward Building, this upper part of the proposed elevation offers a change in the materiality and fenestration at the penultimate storey. This helps to visually terminate the elevation and adds interest to its form and appearance within the townscape. The amended design would continue to offer enhanced contribution to the townscape and to the setting and significance of the adjacent Mary Ward House.





Policy Compliance & Conclusions

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Policy Compliance

75. In accordance with the paragraph 200 of the NPPF (December 2023) this report provides a proportionate description of the significance of the heritage assets affected or potentially affected by the Section 73 design amendments to Tavis House. Our assessment has been informed by inspection of the building, other listed buildings, the conservation area and immediate context, and a review of archives. Qualitative judgements have been made and the impacts and effects of the proposed development have been fully assessed. The Section 73 amendments have evolved in consultation with Camden Borough Council.
76. It is concluded that the Section 73 amendments are of a nature and scale that do not alter the conclusions reached in our 2021 assessment that supported the approved scheme. The design proposals remain sensitive and appropriate for the site and the wider historic environment to which they will form a part. The proposals would preserve the significance of the Bloomsbury Conservation Area and complement its character and appearance.
77. The Section 73 amendments would continue to result in beneficial changes that will better reveal the affected asset's interest. The following heritage benefits arise from the development, taken as a whole:
- The provision of a high quality and contextual rooftop storey will establish a sense of aesthetic cohesion that is currently lacking. The quality of the existing rooftop is diminished by its utilitarian appearance, and the addition of a high quality and architecturally appropriate design offers a beneficial change. These proposals will enhance the overall architectural quality of Tavis House and in turn would improve its contribution to the Bloomsbury Conservation Area;

- The overall visual experience and quality of the rear façade would be greatly enhanced by the proposals. Accordingly, the character and appearance of the conservation area, and the setting of nearby listed buildings, would be preserved;
- Investment into the fabric and character of the buildings through development. This will secure the long term conservation of the asset.

78. The setting and significance of nearby listed buildings, in particular the adjacent Mary Ward Centre, would be preserved by the proposals. The Section 73 amendments have carefully considered the importance of this highly graded building immediately to the rear of Tavis House, and its setting. As demonstrated by the approved scheme, Tavis House and the site are capable of sustaining the increased depth to the plan and change to the rear elevational appearance of Tavis House. The Section 73 amended design changes would not cause harm to the significance of the Mary Ward building; conversely the design offers high quality detailing and materials that would complement the setting of the listed building. The proposed landscaped gap that separates the Site from the listed building would continue to be enhanced. Overall, the Section 73 amendments would achieve the same high quality architectural response and improvement to the subservient rear elevation of the building offered by the approved scheme.
79. Because of the nature and scale of the Section 73 amendments there would be no increase or variance to the impact upon the setting of listed buildings in the wider context and no adverse effect on their significance. The proposed changes mostly relate to the more visually obscured parts of Tavis House which offer little or no contribution to the setting of these listed buildings, as part of their significance. It is

concluded that the significance of these assets would be preserved and their setting enhanced through an improvement to the architectural quality at the site. Where changes would be of greater visibility in the townscape, and experienced as part of the setting of listed buildings, they would have limited effect and would be wholly appropriate.

80. Paragraph 210 of the NPPF requires that the effects of an application on a non-designated heritage asset are taken into account in decision making. From inspection and assessment of the building it is clear that the building's heritage interests are primarily derived from its exterior, specifically its frontage, and from its relationship with its context. Overall the proposed changes to the exterior of the building would retain all key features and attributes of interest and improve its appearance and contribution to the streetscape.
81. The Section 73 amendments accord with the relevant policy set out within the London Plan 2021, specifically Policy HC1. Local character would not be compromised and the heritage assets affected are conserved. As with the approved scheme, the Section 73 amendments would allow for continued and appropriate use of the building for its optimum viable use.
82. The Section 73 amendments comply with Policies D1 and D2 of the Camden Local Plan, 2017. They respect local context and character, would preserve and enhance the setting of nearby listed buildings and the character and appearance of the Bloomsbury Conservation Area, and protect special architectural and historic interests.
83. The Section 73 amendments include architectural detail and materials that are of high quality and complementary to the surrounding local character and urban context. As with the approved scheme, no harm is caused to heritage assets and the test set out in Paragraph 208 are not triggered.

Conclusions

84. The existing building at Tavis House dates to the early to mid 1940s and is located on the south-east side of Tavistock Square. Tavis House is noted as an unlisted building of merit in the conservation area appraisal document and it complements the townscape of Tavistock Square.
85. The significance of Tavis House, nearby listed buildings and the Bloomsbury Conservation Area has been assessed, together with its role within the townscape. Impacts that may arise from the Section 73 amendments to the approved scheme have been considered and it is concluded that the significance of all heritage assets would be preserved and townscape maintained.
86. The proposed Section 73 development extension and refurbishment of the existing building seek to improve and complement the building's architectural form and townscape presence, offering improved accommodation whilst maintaining and improving Tavis House's key architectural elements. This assessment concludes that the proposals would enhance Tavis House and its contribution to the built environment and would cause no adverse effects to designated heritage assets.
75. Our assessment finds that the proposed Section 73 design amendments to the approved scheme would preserve the character and appearance of the Bloomsbury Conservation Area and the setting and significance of the nearby listed buildings. As with the approved scheme, sections 16, 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, are adhered to. The proposals offer sympathetic and informed changes that would maintain and improve the overall interests of the historic built environment.

Appendix I - Legislation, Policy & Guidance

Legislation, Policy & Guidance

Legislation

- 1) The Planning (Listed Building and Conservation Areas) Act 1990 is the current legislation relating to listed buildings and conservation areas and is a primary consideration.
- 2) In respect of proposals potentially affected listed buildings, Section 66 states that *“in considering whether to grant planning permission or permission in principle 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 any features of special architectural or historic interest which it possesses”*.
- 3) In respect of conservation areas, Section 72 of the Act places a duty on the decision maker to pay special attention to the desirability of preserving or enhancing the character or appearance of the area.

National Planning Policy Framework (revised December 2023)

- 4) The Government’s planning policies for England are set out within the National Planning Policy Framework (revised 2023). It sets out a framework within which locally prepared plans can be produced. It is a material consideration and relates to planning law, noting that applications are to be determined in accordance with the local plans unless material considerations indicate otherwise.
- 5) Chapter 16, ‘Conserving and enhancing the historic environment’, is of particular relevance.
- 6) Heritage assets are recognised as being a irreplaceable resource that should be conserved in a manner appropriate to their significance. (Paragraph 195) The conservation of heritage assets in a manner appropriate to their significance is also a core planning principle.
- 7) Conservation (for heritage policy) is defined at

annex 2 as: “a process of maintaining and managing change in a way that sustains and, where appropriate, enhances its significance.” It differs from preservation which is the maintenance of something in its current state.

- 8) Significance (for heritage policy) is defined at annex 2 as: “The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting...”
- 9) As a framework for local plans the NPPF, at paragraph 200, directs that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, taking into account four key factors:
 - a. “The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
 - b. The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - c. The desirability of new development making a positive contribution to local character and distinctiveness; and
 - d. Opportunities to draw on the contribution made by the historic environment to the character of a place.”
- 10) This approach is followed through in decision making with Local Planning Authorities having the responsibility to take account of ‘a’ as well as ‘The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality’ and ‘the desirability of new development making a positive contribution to local character and distinctiveness’. (Paragraph 203)
- 11) Describing the significance of any heritage asset

affected, including the contribution made by its setting, is the responsibility of an applicant. Any such assessment should be proportionate to the asset’s significance. (Paragraph 200)

- 12) Identifying and assessing the particular significance of any heritage asset potentially affected by a proposal, taking into account evidence and expertise, is the responsibility of the Local Planning Authorities. The purpose of this is to ‘avoid or minimize any conflict between the heritage asset’s conservation and any aspect of the proposal’. (Paragraph 201)
- 13) In decision making where designated heritage assets are affected, Paragraph 205 places a duty of giving ‘great weight’ to the asset’s conservation when considering the impact of a proposed development, irrespective of the level of harm.
- 14) Heritage Assets are defined in Annex 2 as: “A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”
- 15) Harm to designated heritage assets is categorized into ‘substantial harm’, addressed in Paragraphs 206 and 207 of the NPPF, or ‘less than substantial harm’, addressed in Paragraphs 202.
- 16) The effects of any development on a heritage asset, whether designated or not, needs to be assessed against its archaeological, architectural, artistic and historic interests as the core elements of the asset’s significance.
- 17) The setting of Heritage Assets is defined in Annex 2 of 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.”

National Planning Practice Guidance

- 18) National Planning Practice Guidance relating to Chapter 16 of the NPPF was last modified on 23 July 2019.
- 19) In respect of levels of harm paragraph 018 recognises that substantial harm is a high test. Case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset. In cases where harm is found to be less than substantial, a local authority is to weigh that harm against the public benefits of the proposal.
- 20) Proposals can minimise or avoid harm to the significance of a heritage asset and its setting through first understanding significance to identify opportunities and constraints and then informing development proposals.
- 21) A listed building is a building that has been designated because of its special architectural or historic interest and includes the building, any object or structure fixed to the buildings, and any object or structure within the curtilage of the buildings which forms part of the land and has done so since before 1 July 1948. (Paragraph 023)
- 22) The term ‘Special architectural or historic interest’ as used in legislation are used to describe all parts of a heritage asset’s significance.
- 23) Paragraph 007 of the NPPG states:

67)“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and

Legislation, Policy & Guidance

acceptability of development proposals."

24) Paragraph 013 states:

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

London Plan (2021)

25) The London Plan (2021) provides a city wide framework within which individual boroughs must set their local planning policies. It is not a revision but offers a new approach from previous iterations of the London Plan. While policies are generally strategic and of limited relevance the policies relating to the historic environment are detailed within Chapter 7 Heritage and Culture. These have been aligned with the policies set out in the NPPF, key of which is Policy HC1: Heritage Conservation and Growth. This policy provides an overview of a London wide approach to heritage and in doing so requires local authorities to demonstrate a clear understanding of London's historic environment. It concerns the identification, understanding, conservation, and enhancement of the historic environment and heritage assets, with an aim to improve access to, and the interpretation of, the heritage assets. It states 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 Local Policy

Camden Local Plan 2017

- 27) Relevant local planning policy is set out in the Camden Local Plan 2017. Policies D1 Design, D2 Conservation Areas and Policy D2 Heritage are of most relevance.
- 28) Policy D1 requires that development:
- A *Respects local context and character;*
 - B *Preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
 - E *Comprises details and materials that are of high quality and complement the local character.*
- 29) Policy D2 Heritage states that, relating Conservation Areas, The Council will:
- E *require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- 30) Policy D2 Heritage states that, relating to Listed Buildings, The Council will:
- K *Resist development that would cause harm to significance of a listed building through an effect on its setting.*