



Project

Tavis House

Title

Heritage and Townscape Statement

Client

Tempus Reality Holdings 1 (Jersey) Limited

Date

April 2024





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| Heritage & Townscape Statement | Tavis House, 1-6 Tavistock Square, Camden | Tempus Reality Holdings 1 (Jersey) Limited |
| Report Version: V3a | Project Reference: 00229 | © Jon Lowe Heritage Ltd |

Introduction

1. This Heritage and Townscape Statement has been prepared in support of an application at Tavis House, 1-6 Tavistock Square, London, WC1H 9NA for Section 73 amendments for:-

"Variation of conditions 2, 9, 13 and 15 approved under planning permission reference 2021/6105/P on 1 December 2023 for 'Refurbishment and extension of the existing building to provide new entrances, a new roof top pavilion, roof top plant equipment and enclosures, rear extension and cycle parking associated with Class E use together with new hard and soft landscaping and other ancillary works'. NAMELY amendments to external rear facades, rooftop plant and other associated works."

Purpose of the Statement

2. The purpose of this statement is to assist with the determination of the application by informing the decision maker, Camden London Borough Council, on the effects of the proposed design amendments to the approved development on the historic built environment. Value judgements on the significance of the heritage assets affected are presented and the effects of the proposals on that significance are appraised. The statement is an updated version of the Heritage and Townscape Statement (December 2021) submitted in support of approved development (2021/6105/P).
3. Specifically this statement assesses the capability of the site to absorb change without negatively impacting on its significance and will highlight and describe the heritage benefits of the proposed scheme. Consideration is given to the effects of the proposed alterations on the significance of Tavis House, the Bloomsbury Conservation Area and nearby listed buildings and to the visual impact of the proposals on the area's townscape character. It will demonstrated that the proposed amendments are minor and do not affect the findings of the 2021 Heritage and Townscape Assessment.

Proposed Scheme

4. As Tavis House is not statutorily listed the proposed internal changes, where they will not impact or change the external appearance of the building, will not require planning permission and are therefore not assessed in great detail here. The proposed external changes will take account of the significance of Tavis House and its contribution to the setting and significance of affected heritage assets.

Methodology

5. Tavis House and surroundings has been observed and assessed by the author during a number of site visits undertaken in November 2020, June 2021 and February 2024. The findings have informed design development. Value judgements relating to significance and interest have taken into account the architecture, history, materials and context.
6. To understand heritage significance and sensitivities the extant building and context were inspected during the development of the proposals. Value judgements based on observation of the building fabric, form and features were made and these were further supported by documentary research. Observations were also undertaken to better identify the sensitivity of the building and site to change, together with opportunities for enhancement. Working with the design team, proposals that include enhancements are proposed. The changes at the site are considered to be within the building's tolerance for change.

Pre-application & Design Evolution

7. Prior to the submission the applicant team engaged in pre-application consultation with Camden Borough Council, as set out in the Design and Access Statement. Changes to the design of the scheme were made in response to design comments raised. All changes built upon the approved 2021 proposals and have sought to avoid or minimise harm to the historic environment, promote good design and to regenerate the site to accord with national, regional and local planning policy and guidance relating to the historic environment.

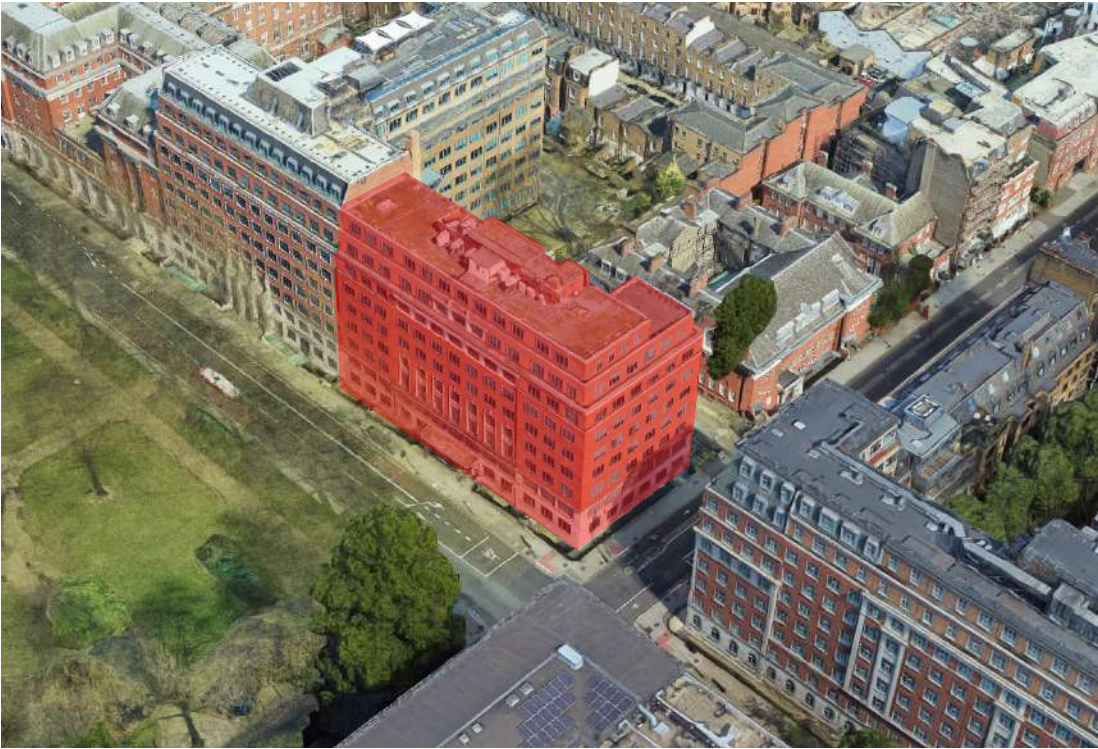


Figure 1: Aerial view of Nos. 1-6 Tavistock Square, Tavis House, shaded red



Figure 2: Front and south elevations of Tavis House



Understanding the Site

Understanding the Site

Location & Context

- 8. Tavis House occupies a site at the south-east corner of Tavistock Square, at the junction of Tavistock Square and Tavistock Place and is located in the London Borough of Camden. Tavis House's context is dominated by the adjacent garden square and the large scale, multi-plot properties that surround it. These later buildings, which are in a variety of uses, are the result of the area's extensive redevelopment throughout the 20th century.
- 9. To the immediate east, to the rear of Tavis House, the context quickly transitions to a townscape comprising the area's original early 19th century street pattern and relatively intact surviving terraces of houses. There is a more varied character here, with buildings of varying scales, forms and ages present. Of note is the former Mary Ward Settlement building, which is grade I listed. It was built as an institute in the late 1890s in an advanced Arts and Crafts manner by Alan Dunbar Smith and Cecil Brewer.

Tavis House

- 10. Tavis House is a large building that fronts onto Tavistock Square and occupies a L-shaped footprint. It is eight storeys in height with the top three levels staggered inwards from the build line of the front and side elevations. The building's return elevation faces south onto Tavistock Place whilst the rear opens onto a car park, access road and the west elevation of Mary Ward Hall.
- 11. Tavis House is faced in Portland stone at ground and first floors and red brick above whilst the rear is built-up in yellow stock brick. The main entrance, located on the Tavistock Square side, is accented by a simple surround and cantilevered entrance canopy, with further articulation provided by an ironwork balcony and simple consul brackets above at first floor level. Windows across the building are simple and have no decorative surrounds save for those within the central bay.

- 12. The rear elevation has a reduced presence in the townscape and this reflected in its utilitarian character and lower overall quality when compared to the frontage.

Heritage Context

- 13. The Site is located in the Bloomsbury Conservation Area. The conservation area was designated in 1968. An Area Appraisal and Management Strategy document, adopted in April 2011, summarises the character of the area as such:

Bloomsbury is noted for its formally planned arrangement of streets and the contrasting leafy squares. The urban morphology comprises a grid pattern of streets generally aligned running north-west to south-east and south-west to north-east, with subtle variations in the orientation of the grid pattern. The quintessential character of the Conservation Area derives from the grid of streets enclosed by mainly three and four-storey development which has a distinctly urban character of broad streets interspersed by formal squares which provide landscape dominated focal points.

- 14. The conservation area is divided into fourteen character sub areas; Tavis House is located on the edge of Sub Area 6: Bloomsbury Square/ Russell Square/Tavistock Square, but has a presence in the adjacent Sub Area 13: Cartwright Gardens/Argyle Square.
- 15. Within the Bloomsbury Conservation Area Audit and supporting documents Tavis House is identified as a 'Positive Building' and is therefore considered by Camden Borough Council to contribute to the character and quality of the local area.
- 16. There are a number of listed buildings in close proximity to the Site, highlighted by the map in Figure 3. Whilst present within the setting of these nearby listed buildings, the Site's central location on a secondary street results in it having an incidental role within the setting of these nearby listed buildings.

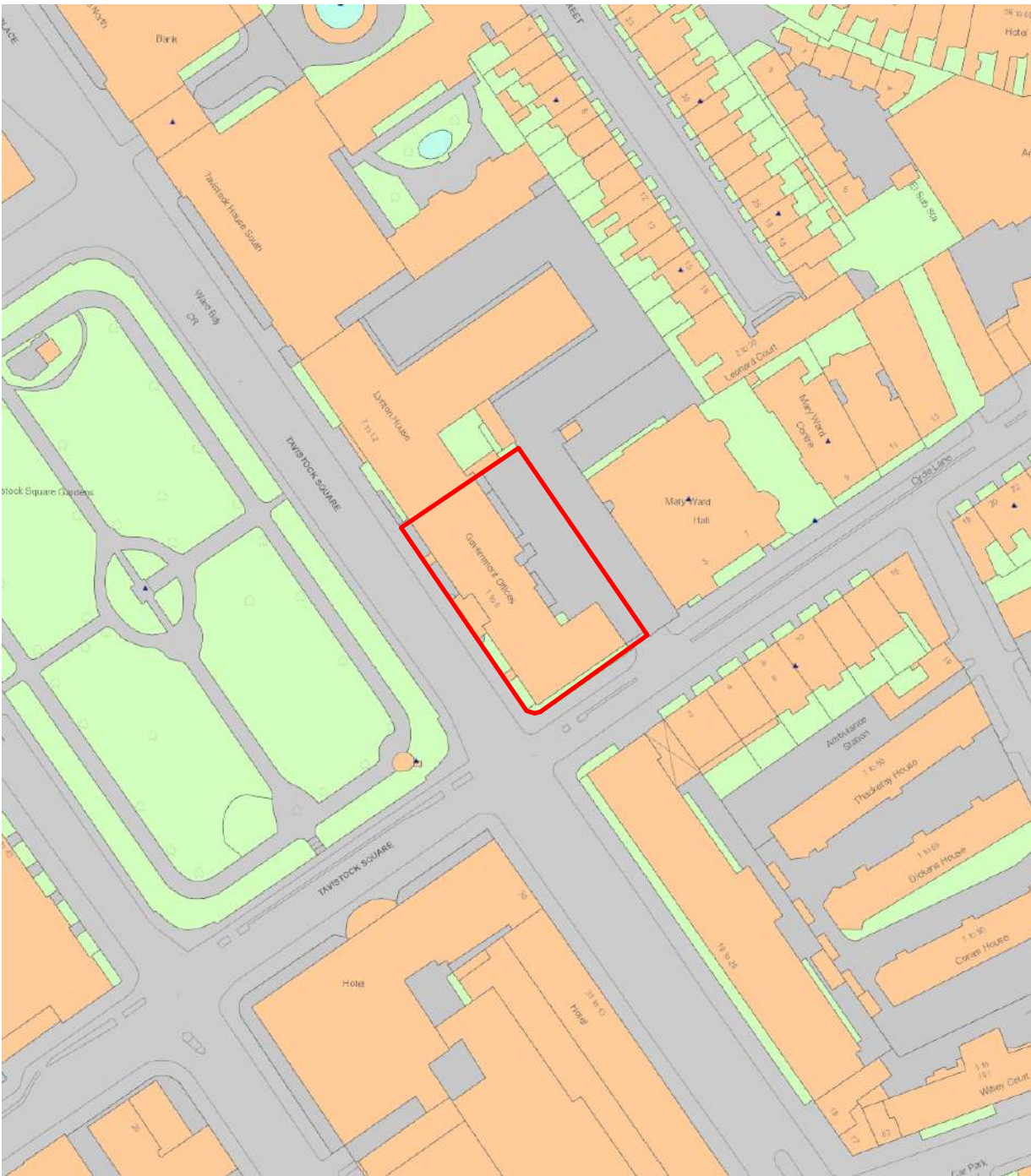
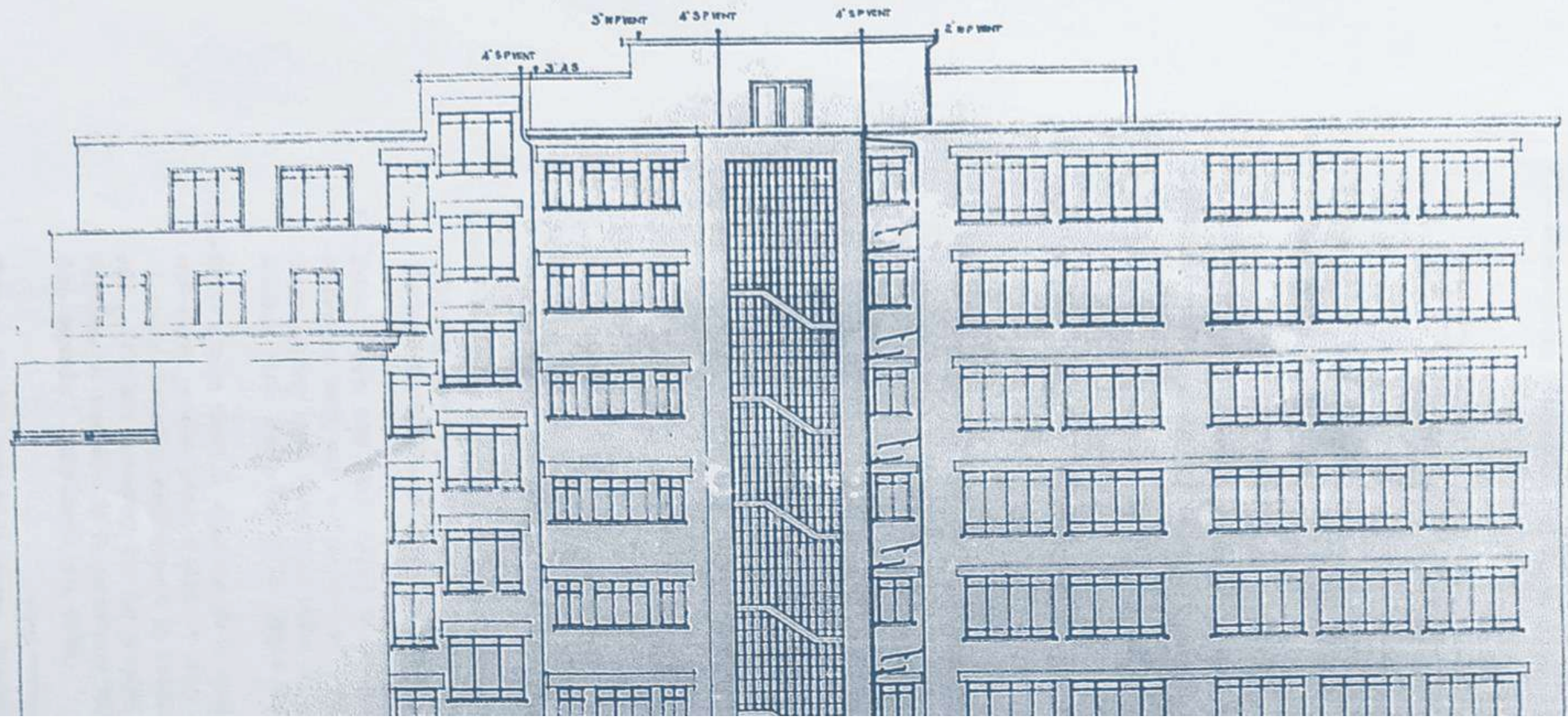


Figure 3: Area plan of the Site, delineated in red, and its surroundings. Nearby designated heritage assets denoted by a blue triangle.



Historic Background

Historic Background

Area Development

- 17. Tavistock Square was set out as part of a planned development on land historically owned by the Dukes of Bedford, with plans for development conceived by Francis Russell, the 5th Duke of Bedford. Tavistock Square is named for the subsidiary titles of the Duke of Bedford—Marquess of Tavistock, which had been traditionally gifted to the eldest sons of the Dukes of Bedford since 1694.
- 18. Development began from around 1806 with the east side of the Square, led by the speculative property developer James Burton. Later the western side was developed by Thomas Cubitt 1825–6, which largely drew upon the existing design, and proportions of the Burton portion of the Square. This occurred early in the career of Thomas Cubitt who went on to develop many other of the formally arranged squares across London. .
- 19. The square underwent largescale redevelopment in the late 19th and early 20th Century. Many of the Georgian terraces which formerly occupied all edges of the square were cleared on the north, east and south sides.
- 20. These later buildings were considerably larger in scale and mass and occupied multiple plots. What is now the administrative headquarters British Medical Association, designed by Sir Edwin Lutyens in the early 1910s, inspired much of the later development of the area. Buildings constructed as part of this early 20th century phase of development include Tavistock Court and Woburn House on the north side. The Tavistock Hotel on the south side and Lynton House and Tavis House (the application site) on the west side.

Tavis House

- 21. The site was originally occupied by a terrace of late Georgian townhouses (Nos 1-12 Tavistock Square), designed by James Burton.

Descriptions of the lease available from the National Archive reveal the plots 1-6 Tavistock Square have been known as Tavis House from at least 1940. Aerial photographs in Figures 4 and 5 date from 1939 and 1946 respectively - that from 1939 shows a cleared site and that from 1946 show Tavis House, indicating a build-date of the early to mid 1940s. Tavis House was built to the designs of Trehearne, Norman, Preston & Partners and constructed as the 'London Appointments Office' for the Ministry of Labour and National Service.

- 22. The 1945 Bomb Damage Map (Figure X) is based upon the earlier 1916 OS Map. While the shading in yellow in indicating light blast damage to terrace at Nos. 1-6 Tavistock Square, this is likely regarding Tavis House which had been constructed by this date. The map also shows buildings on the site of Lynton House have been marked for clearance.
- 23. The OS Map of 1951 shows the entire eastern edge of the Square to have been cleared and shows Tavis House as constructed. The plot of Lynton House has remained vacant.
- 24. Tavis House at the time of its construction housed three sections of Ministry of Labour and National Service dealing with recruitment for the nursing profession, a service providing a technical and scientific register, and the appointments office. The Ministry of Labour was renamed the Ministry of Labour and National Service in 1939 as an expansion of its duties following the outbreak of the Second World War and the passing of the National Service Act in 1939.
- 25. Throughout the 20th century Tavis House was occupied by various government departments and the building has been upgraded to meet changing needs of use and accommodation - noticeably, plant and additional enclosures have been added at roof level and the original metal-framed windows replaced. However, Tavis House retains much of its original external character.

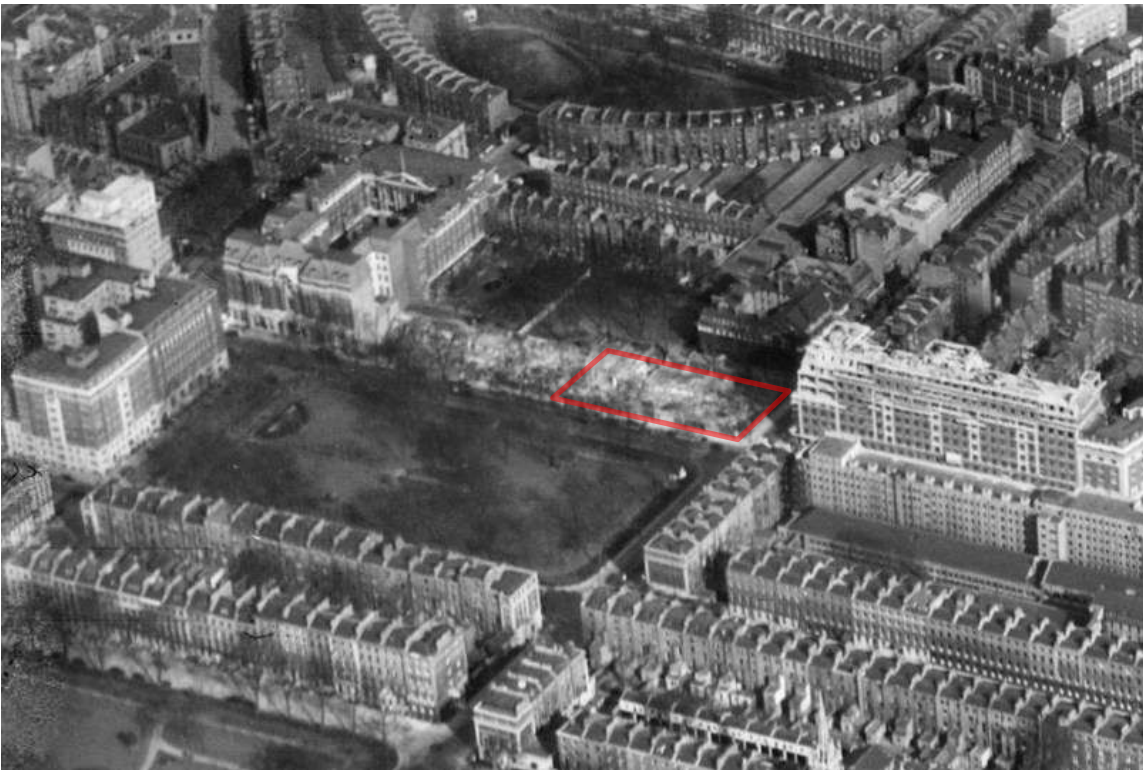


Figure 4: 1939 aerial photograph, site of Tavis House delineated in red

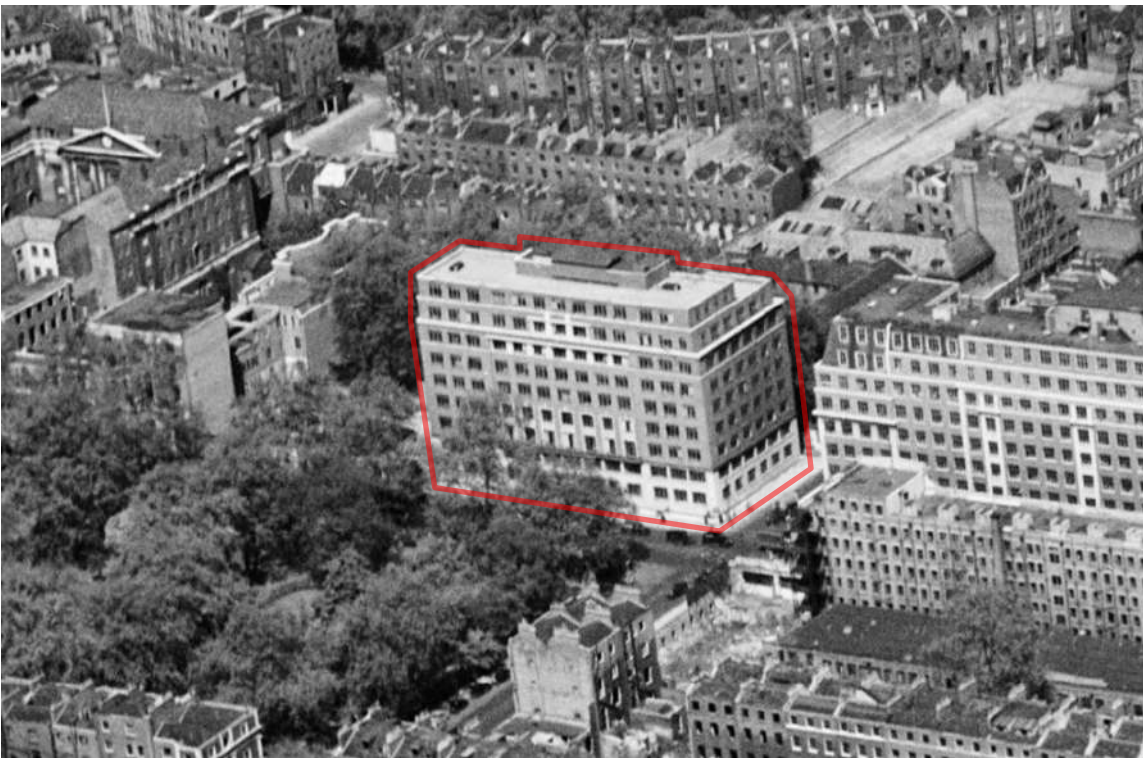
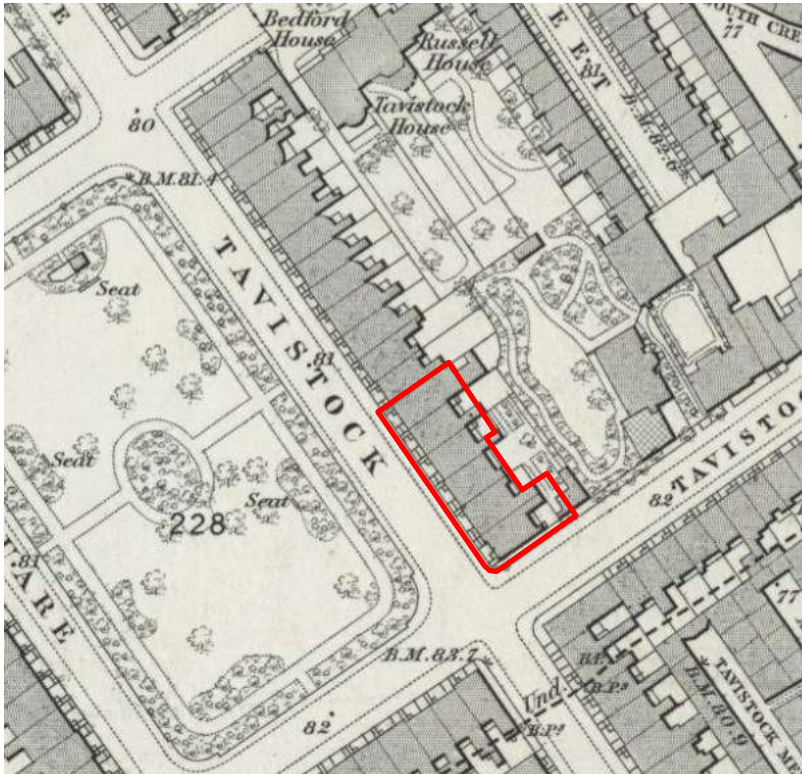


Figure 5: 1946 aerial photograph of Tavis House, delineated in red

Historic Background



Horwood Map (1792-99)



OS Map (1876)



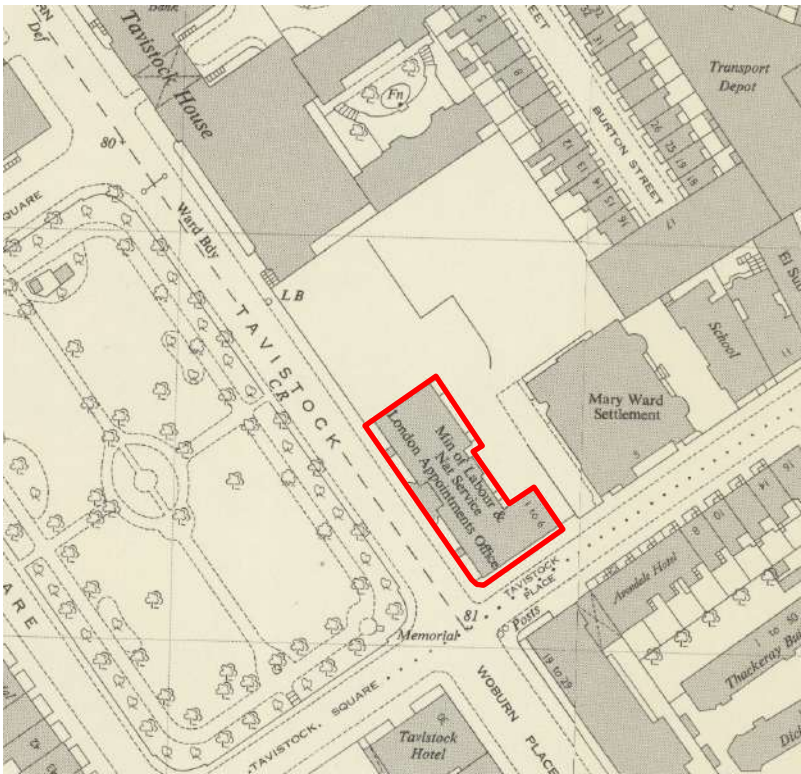
OS Map (1895)



OS Map (1916)



Bomb Damage Map 1945



OS Map (1953)

Figure 6: Historic Map Regression. Tavis House delineated in red.



Assessment of Significance

Assessment of Significance

- 26. The National Planning Policy Framework (NPPF, December 2023) promotes understanding significance in order to judge the acceptability of the effects of a proposal upon it. Significance, for heritage assets, comprises the asset's architectural, historical, archaeological and artistic interests.
- 27. This section provides a proportionate interpretation of the significance of those heritage assets potentially affected by the proposed development.
- 28. Tavis House is not statutorily listed though is recognised as a 'positive contributor' to the Bloomsbury Conservation Area by Camden Borough Council. For the purposes of this heritage statement the entire site will be treated as a non-designated heritage asset.
- 29. There are a number nearby listed buildings and the Tavis House forms part of their setting. None of the listed building are proposed to be altered nor would they be directly impacted upon by the works proposed at Tavis House. Any potential for the significance of designated heritage assets to be affected relates to: impacts on the character and appearance of the conservation area and impacts on the setting of listed buildings as a contributing aspect of significance. Consideration is therefore given to the way in which the setting of these listed buildings and conservation areas, and how it contributes to their significance, is affected.

Significance of Tavis House

- 30. Tavis House derives its significance principally through its architectural interest: through the quality and composition of both its front and return elevations, its relationship to the immediate context of Tavistock Square and through its association with the redevelopment of this area of Bloomsbury in the mid-20th century.
- 31. Tavis House is a modest example of interwar civic/municipal architecture, displaying simple modernist and deco forms and detailing. The elevation facing Tavistock Square garden is the

building's primary feature of interest with the main entrance forming the building's focal point. The lower ground floor is opened by the lightwells which flank the main entrance and are bounded by Portland stone dwarf walls and iron railings. Portland stone cladding also extends from lower ground to first floor. This is repeated on the return elevation that fronts onto Tavistock Place.

- 32. The main entrance is given prominence by a projecting canopy, a later addition, sill bands and a small second floor balcony and iron railing that is supported by simple moulded consul brackets. Above the entrance the elevation is slightly recessed up to sixth floor level. At first floor level the verticality of the seven central windows are emphasised through double-height stone surrounds which are further defined by projecting key stones and divided by textured concrete friezes. The entrance itself is modern and of no heritage or townscape value.
- 33. The sixth, seventh and eighth floors are set back from each other on the front and return elevations, creating Tavis House's distinct tapered form. Each level is topped by a projecting stone cornice that defines the storey and breaks up the building's massing. The central bays of the front elevation at sixth floor level, like the ground and first floor bays below, is articulated with a series of broad deco styled columns pedimented by shallow stone canopy. This arrangement is partially replicated on the central three windows of the seventh storey, which have similar stone detailing to the sixth below, beneath a band of stonework.

- 34. The roof to Tavis House is flat, utilitarian in character and of no heritage or townscape value. There is a mix of plant, plant enclosures, access areas and rooflights. Access to the roof is made through an ancillary rooftop structure that is set well back from but is visible in views of the rear elevation. It is flanked by a brick screen that surrounds several plant units although the increased requirements of Tavis House has meant additional plant is now located in unscreened areas across the roof.



Figure 7: Front entrance of Tavis House



Figure 8: Rear elevation and roof of Tavis House

Assessment of Significance

Bloomsbury Conservation Area

35.

The Bloomsbury Conservation Area is of significance for its architecture and history. These combined result in an area of distinct character and appearance.
36.

Tavis House is located in Sub Area 6: Bloomsbury Square / Russell Square / Tavistock Square. Paragraph 5.79 of the Conservation Area Appraisal states that Sub Area 6 is:

... largely made up of three-and four-storey late 18th and 19th century terraces surrounding a sequence of linked formal spaces, namely Bloomsbury Square, Russell Square and Tavistock Square. A series of north-south vistas visually connect the three squares. Moving through the area, there is a transition between the enclosed, urban nature of the streets and the more open squares which are softened by trees and green landscape. In places, the original terraces have been replaced with 20th century development, mostly of a larger scale and urban grain; this is particularly noticeable around Tavistock Square, Bedford Way and Upper Woburn Place.
37.

Paragraph 5.98 describes the buildings along the east side of Tavistock Square, focusing on the British Medical Association, but also mentions Tavis House and adjacent Lynton House:

To the south, Lynton House and Tavis House are substantial mid-20th century blocks built in red brick with a stone base and central entrance. Both have seven main storeys on the frontage, a consistent parapet level.
38.

Tavis House is representative of mid 20th century commercial and residential architecture that typifies much of the area around Tavistock Square, and by virtue of its scale, facing materials and design sits comfortably in its context and contributes modestly to the character and appearance of the conservation area.

Listed Context

39.

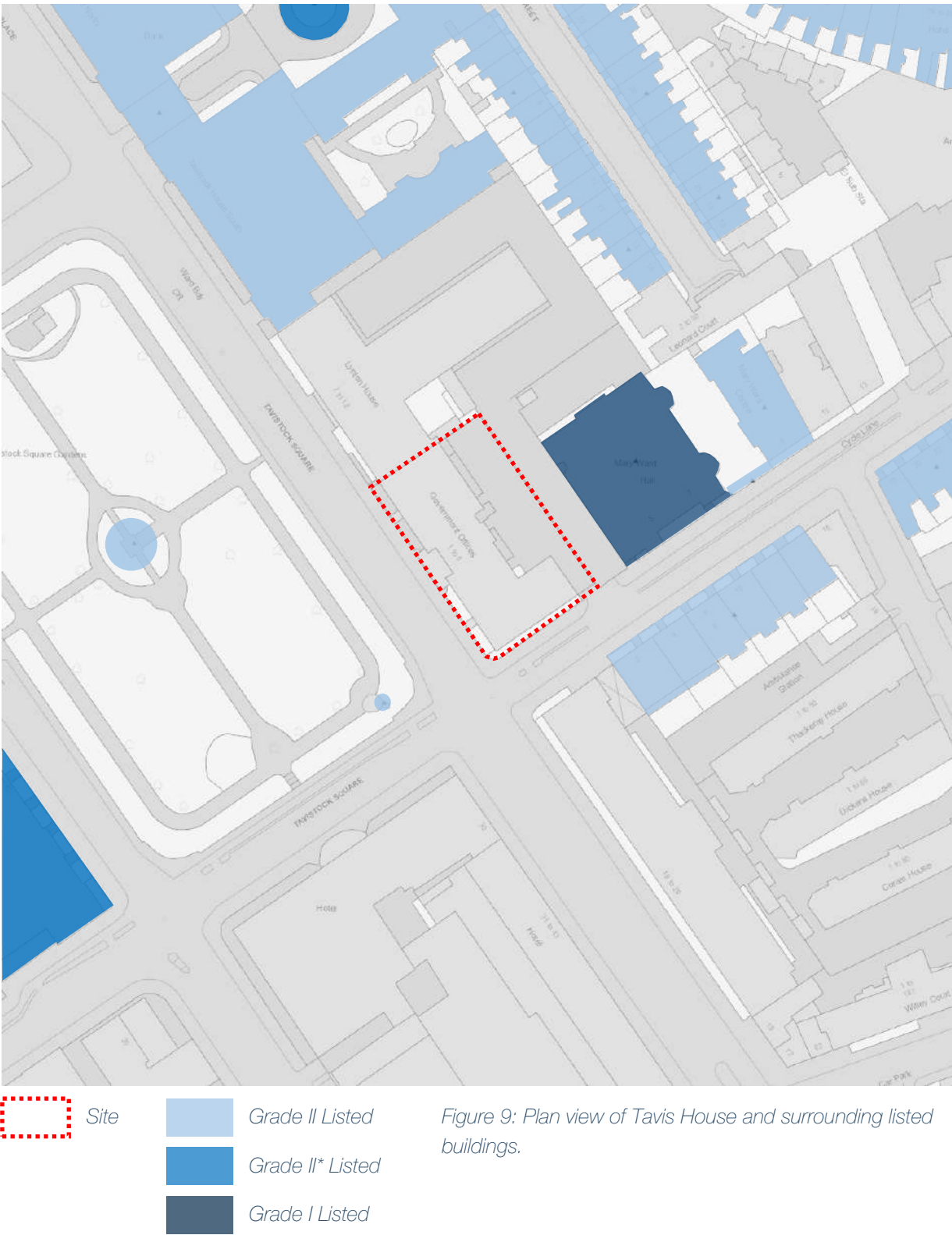
Nearby listed buildings assessed in this section are recognised as being of special architectural or historic interest. They each contribute to the character and appearance of the conservation area and are important features within the immediate street scene around Tavis House.
40.

Mary Ward House, Grade I: Built in 1890 as one of London's first "settlements" run by socially-conscious middle-class educators for the benefit of local working people and their children. It was designed by Arnold Dunbar Smith and Cecil Brewer and constructed in an advanced Arts and Crafts manner. Its impressive Arts and Craft design, degree of preservation and its original social purpose make it a building of high significance.
41.

The building's wide frontage and detached form gives it a degree of prominence in a context of largely terraced properties, though it sits lower than the majority of the buildings surrounding it, making it somewhat overshadowed. To the north and west its setting is dominated by Tavis House and other larger 20th century developments. To the south and east Mary Ward House is experienced as part of the Georgian and Victorian terraced streetscape along Tavistock Place.
42.

Given the overall quality of the townscape around Mary Ward House, the setting of the building makes a modest contribution to its significance. An exception to this townscape quality is the presence of the access and service area to the rear of Tavis House, whose utilitarian character and low quality detracts from the setting of the listed building.
43.

Mary Ward Centre, Grade II: Built just after Mary Ward House in the early 20th century to the designs of the same architects though carried out in a Neo-Georgian style. It has broadly the same setting as Mary Ward House, though its principal elevation does not front the public realm and the building is set behind a tall boundary wall and it is



Assessment of Significance

surrounded on three sides by taller buildings. It lacks the townscape prominence of its neighbour and as such it is experienced as a more recessive element within the townscape. It derives interest from the presence of the Mary Ward House and the two together have group value though it gains little value from its wider setting.

44. There is no direct visual relationship between the Mary Ward Centre and the rear of Tavis House due the screening effect of Mary Ward House. The two are instead incidentally experienced as part of the wider townscape along Tavistock Place.
45. **Nos. 2-14 Tavistock Place, Grade II:** This short terrace, located directly south of Tavis House on the opposite side of Tavistock Place, comprises six early 19th century townhouses that were rebuilt with facsimile facades in the 1970s. Much of their significance relates to the architectural quality of the street frontages and as such the significance derived from their setting relates to how their principal elevations are experienced within the townscape.
46. The south elevation of Tavis House and Nos. 2-14 Tavistock are both experienced as part of the townscape along Tavistock Place. Whilst there is a visual connection due to their proximity the value of the interrelationship is limited due to difference in typology, form, style, age, massing and scale between the two. As with the setting of Mary Ward House, the overall quality of the townscape around the listed terrace ensures the setting of the building makes a modest contribution to significance.
47. **British Medical Association House, Grade II:** A substantial multi-phase building developed over the first half of the 20th century and comprising a number of ranges and courtyards, the earliest of which was designed by Sir Edwin Lutyens. It is the most notable building overlooking the eastern side of Tavistock Square, with its entrance an

important feature of the townscape and one that terminates the view looking east from Endsleigh Place and from the north side of Gordon Square.

48. The setting of the BMA therefore contributes to its significance. The deliberate positioning of its entrance and the relationship of the frontage with the garden square and wider townscape enhance the experience of the building. Tavis House, by virtue of its scale, facing materials and design sits comfortably in the setting of the BMA.
49. **Nos. 4-34 Burton Street, Grade II:** All properties within the terraces along the southern end of Burton Street, located to the north of Tavis House, are Grade II listed. Though built in the early 19th century all were heavily restored in the 1980s. Much of their significance relates to the street frontages and as such the significance derived from their setting relates to how their principal elevations are experienced within the townscape. The rear elevations of the terrace, where any visual relationship with Tavis House would occur, are subservient and experienced in a mixed and subservient context and minimal townscape value.
50. **Statue of Mahatma Gandhi and Memorial to Dame Louisa Aldrich Blake in Tavistock Square Gardens, both Grade II:** Both statues are of artistic value and derive some further interest from their location in Tavistock Square. Both are deliberate set-pieces that are principally experienced from within the garden square, though the Dame Louisa Aldrich Blake memorial has some presence in the street scene along the south and east sides of Tavistock Square. Tavis House, as part of the typical townscape context around Tavistock Square, contributes minimally to the statues setting and significance.
51. **Nos 29-45 Tavistock Square, Grade II*:** This terrace, located on the opposite side of Tavistock Square to Tavis House, comprises sixteen early 19th century townhouses. Much of their significance relates to the architectural quality of



Figure 10: The Mary Ward Centre (Grade I) and Nos. 2-14 Tavistock Place (Grade II)



Figure 11: The BMA (Grade II), as viewed from the corner of Tavistock Square

Assessment of Significance

their garden square frontages and as such the significance derived from their setting relates to how their principal elevations are experienced within the townscape, especially when viewed from the adjacent Tavistock Square. However, the extent of 20th century development around Tavistock Square has diminished the value of its setting.

Townscape & Views

52. The townscape along Tavistock Square and Tavistock Place has its origins in the late Georgian period and has seen subject to redevelopment in the 20th century. It is highly varied and comprises a broad range of building types, scales, forms ages, styles and uses and spaces.
53. Around Tavistock Square the townscape is dominated by number of large-scale 20th century buildings. Those located on the north, south and east sides are between six and ten stories in height. There is some consistency in the use of materials: red brick with stone dressings predominates, reflecting the facade of the British Medical Association building, although later buildings employ a sizeable amount of concrete. The west side of Tavistock Square retains its original building stock - Nos. 29-45 Tavistock Square, which are typical Regency townhouses
54. Tavistock Place is a busy side street that is more mixed in character with a large proportion of buildings dating from the late 19th and early 20th centuries. The height and articulation of the early 19th century four-storey townhouses on the south side is echoed in the larger scale but continuous block on the north side at No 15. Elsewhere there is a predominance of red brick and ornate detailing, as found in the larger scale mansion blocks of the later 19th century.



Figure 12: Townscape view of Tavis House and context, as viewed from the west



Figure 13: Townscape view of Tavis House and context, as viewed from the east



Heritage Impact Assessment

Heritage Impact Assessment

55. This chapter appraises the impacts of the proposed development on the heritage sensitivities identified within the report. It supports the Local Planning Authority in their decision making process.

Development of Proposals Summary

56. The approved development included:
- i. Roof terrace with pavilion, pergola and plant enclosure;
 - ii. Rear infill extension with terrace, small rearward extension at eighth floor level and new external staircase;
 - iii. Alterations to main entrance, surround and lightwells;
 - iv. Alterations to entrance on Tavistock Place elevation;
 - v. New windows on return elevation;
 - vi. Repaving of rear yard and addition of bin store and UKPN enclosure;
 - vii. Internal alterations;
57. The Section 73 amendments vary the design of the external rear facades, rooftop plant together with other associated works. Detail of the amended proposals are presented in the submitted drawing pack and Design and Access Statement. These should be consulted before reading the following section.
58. Any effect on the townscape or identified heritage receptors would arise solely from changes to the external form and appearance of Tavis House, not its interior. External changes in massing or the building's appearance have the potential to affect the building's contribution to the character, appearance and overall significance of the Bloomsbury Conservation Area, and the setting (as part of the significance) of nearby listed buildings.

59. Accordingly only the following elements of the amended proposals are not assessed:
- Adaptations to front lightwell to accommodate additional plant, including introduction of low level louvres
 - Changes to core and roof layout which have implications for appearance of ninth floor roof pop up
 - Design alteration to rear infill to suit lab-enabled space planning and limit solar gains, namely raising of cill heights, rationalisation of grid, double height opening to allow vehicle turning in rear yard and integrated plant screening to 8th and 9th floors.

- Dedicated plant enclosures to accommodate rooftop plant, resulting in amendments to the approved scheme (which included a rooftop terrace), internal winter garden and terrace proposed at 8th floor.

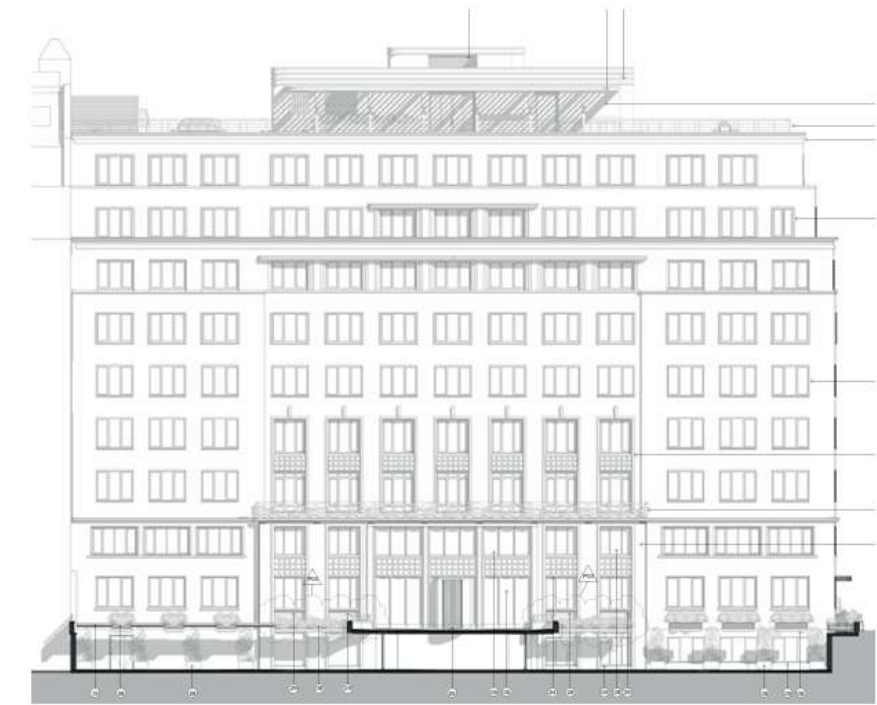
Adaptations to front lightwell to accommodate additional plant, including introduction of low level louvres

60. The proposal includes greening the lightwell with planters set on covering with plant beneath and low level louvres.
61. These elements of the proposed amendments would be neutral in its effect on heritage and townscape receptors. The lightwell is under

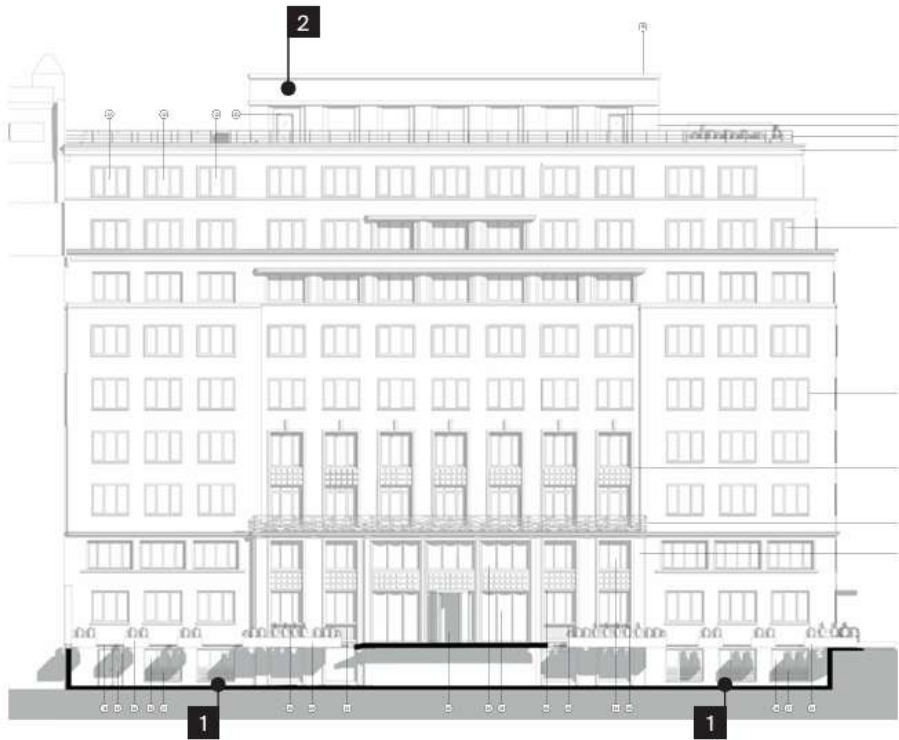
utilised and is physically and visually discrete, contributing little to any heritage significance or townscape character. The retention of the wall and railings would preserve the sense of a lightwell and any contribution it has to the heritage interests and townscape character. The introduction of planters would sustain the offering of the approved development.

Changes to core and roof layout which have implications for appearance of ninth floor roof pop up

62. Internally the core would be expanded in footprint to include larger service risers and an escape stairs. This has two implications to vary the form and external appearance of the approved



2021 Planning Permission



Proposed Section 73 Amendment

Summary of Changes

- 1 Louvres beneath windows to lightwell serving basement plant
- 2 Appearance of ninth floor pop up



Figure 14: Front elevation as approved (left) and proposed (right)

Summary



2021 Planning Permission



Proposed Section 73 Amendment

Summary of Changes

- 1 New openings to existing flank wall removed, existing condition restored
- 2 9th & 8th floor to accommodate rooftop plant with acoustic screening integrated into facade design
- 3 Strobic fans located on eighth
- 4 Double height opening in structure to allow for services vehicle turning
- 5 Balconies removed, facade grid regularised to optimise structure
- 6 Escape stair brought internally

Figure 15: Rear elevation as approved (left) and proposed (right)

development; firstly, the avoidance of an external staircase at the north end of the rear elevation, and, secondly, variation to the ninth floor structure and layout.

63. The approved development included retention of an external fire escape at the north end of the rear elevation, adjacent to the external fire escape of Lynton House. The integration of escape stairs into the core allows simplification and improvement to the proposed external rear elevation and a neater overall composition. Whilst the external stairs were considered to have an acceptable effect on the significance of heritage assets and the townscape character, the proposed amended design is considered preferable - it would enhance the architectural

appearance and rationalise the form, resulting in improved contribution of the building to the setting of the adjacent listed building.

64. At ninth floor level the approved development allowed construction of a rooftop pavilion that occupied a wider footprint than the existing access point. The approved structure was to be taller in height than the existing structure and visible in views of the building from the square. This approved rooftop pavilion was set back from the building's edge and surrounded on its west side by a pergola canopy with terrace amenity space. The proposed amendments would result in a rooftop structure that is wider and deeper in plan, including screened plant utilised for plant. Beneficially the ninth floor would not be served by

lifts and therefore the height of the proposed amendment design is lower than approved.

65. The massing and appearance of the ninth floor, as proposed by the amended design, is considered to be appropriate to the host building and its context. Its architectural design draws upon art deco references and its lowered height limits any perceived bulk that may arise from its larger footprint. It would remain set back from front and rear elevations and importantly it is to be placed centrally, continuing the strong symmetry of the front elevation.

Design alteration to rear infill to suit lab space planning and limit solar gains, namely raising of cill heights, rationalisation of grid, double height

opening to allow vehicle turning in rear yard and integrated plant screening to 8th and 9th floors.

66. The existing rear elevation is mundane and utilitarian in character and appearance and of minimal heritage and townscape value. Approval has been granted for its removal and replacement with a new façade and enlarged footprint. Grant of approval demonstrates that the special interests of the conservation area and nearby listed buildings can sustain change.
67. The proposed amended design seeks to maintain the quality and character of the approved and offers minimal variation in massing. The design changes and proposed use affect the grid and this principally manifests in varied fenestration. The design process has followed a rigorous process that has evidently had consideration to the townscape and heritage receptors and, as per the approved scheme, there is a commitment to high quality materials and architectural appearance.
68. The proposed amended fenestration remains ordered but with greater horizontal emphasis. The glazed bays are set within characterful and vertically tapering glazed brick piers that give depth and visual interest. Raising of the sills results in a rhythm of profiled and pigmented precast concrete spandrel panels and a tripartite of metal framed windows. The order has a functional aesthetic and regularity that reflects the building's architecture and the proposed use.
69. It is no longer proposed to include balconies nor, as described above, the external stairs. These changes are considered beneficial in their effect on appearance and architectural character as they facilitate a simplified overall composition.

Dedicated plant enclosures to accommodate rooftop plant, resulting in amendments to the approved scheme (which included a rooftop terrace), internal winter garden and terrace proposed at 8th floor

70. The approved scheme provided office

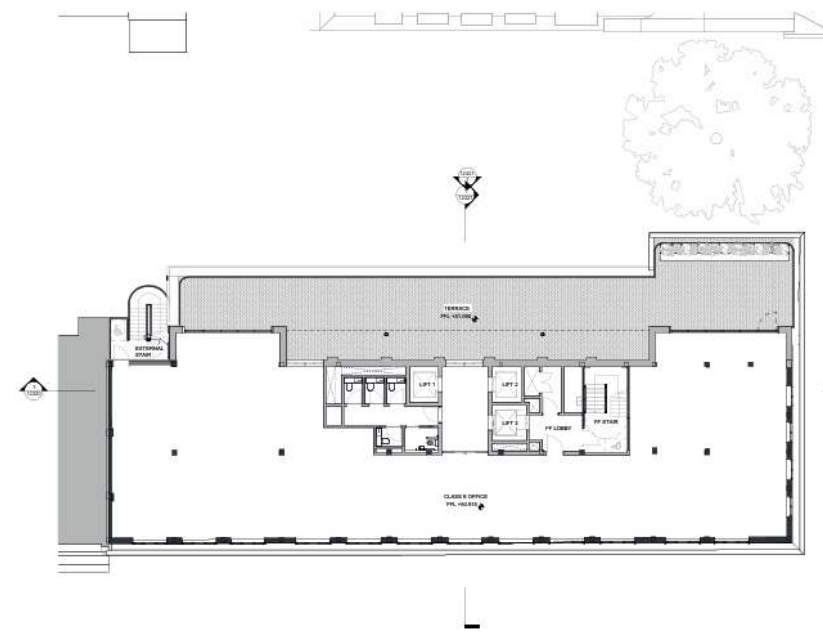
accommodation wrapping around the central core at eighth floor, resulting in a new fenestrated rear elevation. The proposed amended design seeks to utilise much of the northern part of this floor for plant and therefore the rear elevation becomes a solid screen. For design interest the screen is to be formed of scallop profiled and pigmented precast concrete panels serving as a plant screen. These vertically continue the tripartite fenestrative order of each bay with the narrow glazed brick dividing piers. These elements would read as a distinctive termination to the infill rear extension and add architectural interest. These proposed elements of the design would not have any adverse effect on the significance of the heritage assets.

71. To provide amenity space, a winter garden is proposed at the southern end of the 8th floor. Externally any manifestation is limited to a new rooflight where the approved scheme offered roof terrace. The profile and design for the rooflight would not breach the parapet or be visible in any views. Likewise, the internal works would not affect the appearance of the building or change its relationship with its historic context. Accordingly the proposed winter garden is neutral in effect on heritage receptors and townscape character. Any reduction in amenity at rooftop level is not a heritage issue—any townscape effect may be considered beneficial.

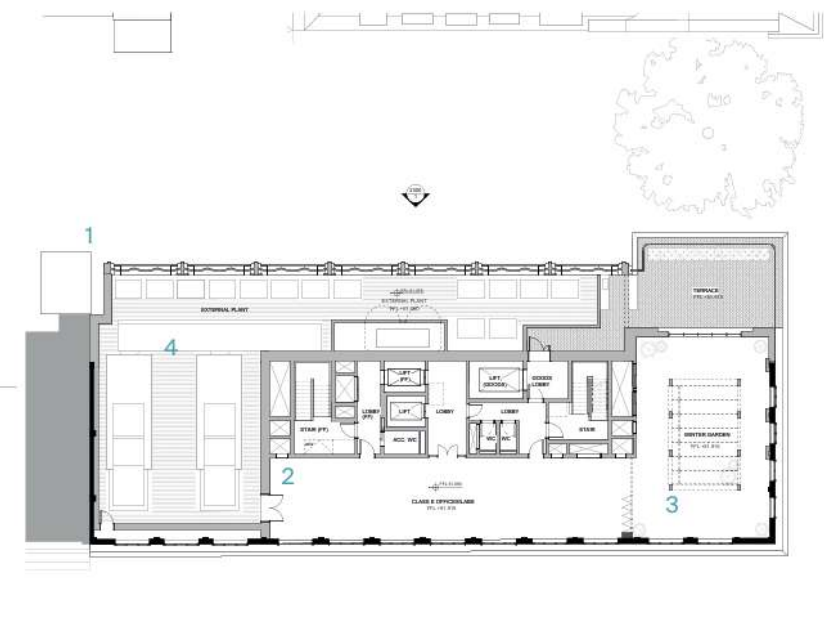
Effect on the Setting of Listed Buildings

72. 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 the highly graded building immediately to its rear, 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 the significance of the Mary Ward building would not be adversely affected. The Section 73 amended design offers considered 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 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.

Eighth Floor



2021 Planning Permission

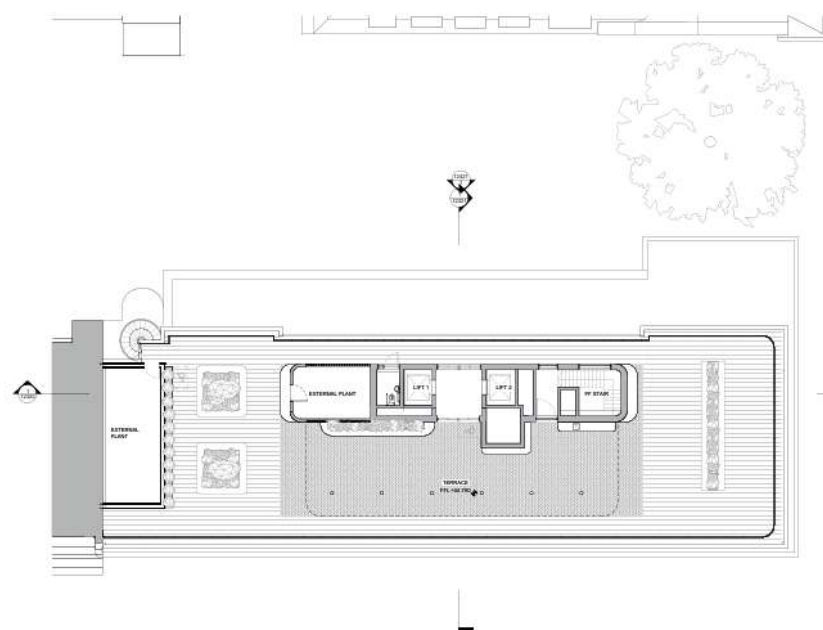


Proposed Section 73 Amendment

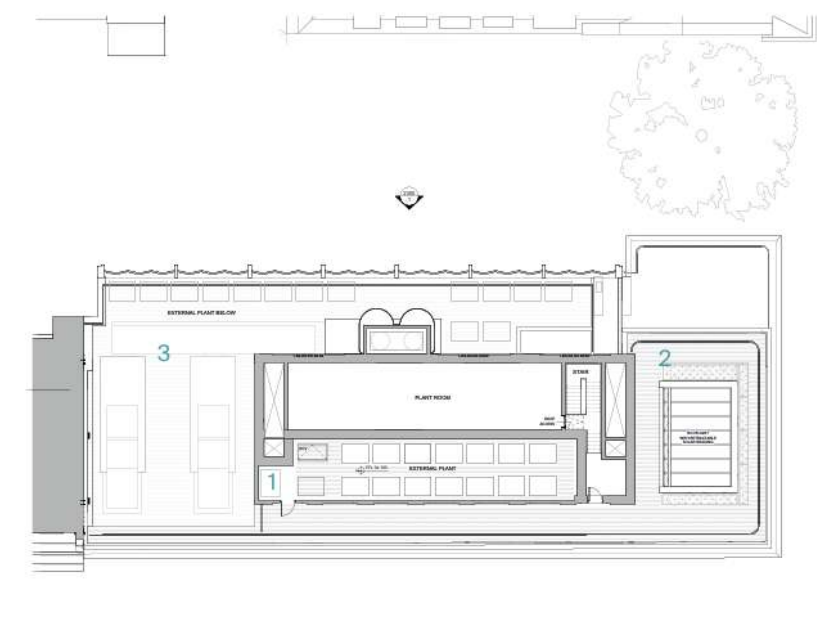
- 1 North east infill - external stair incorporated internally
- 2 Core expanded to include larger service risers and escape stair
- 3 Winter garden amenity space added
- 4 External plant, screened to rear elevation

Figure 16: Eighth Floor plan as approved (left) and proposed (right)

Ninth Floor



2021 Planning Permission



Proposed Section 73 Amendment

- 1 Expanded rooftop 'pop up' containing screened plant and service routes
- 2 Rooflight to winter garden below
- 3 Open to plant area below

Figure 17: Ninth Floor plan as approved (left) and proposed (right)



Townscape Impact Assessment

Townscape Impact Assessment

73. To assess the visual effect of the proposed development on the settings of nearby listed buildings, conservation areas and the local townscape, a viewpoint study was undertaken to review the extent and nature of the building's visibility and contribution to the townscape. It took into account the extent of visibility of the proposed development and the relationship of the building to its context, including heritage assets.
74. The viewpoints identified are not the only views which are likely to be affected by the development but are representative and sufficient to illustrate the urban relationships likely to arise between the proposed development, surrounding heritage assets and within the local townscape context.

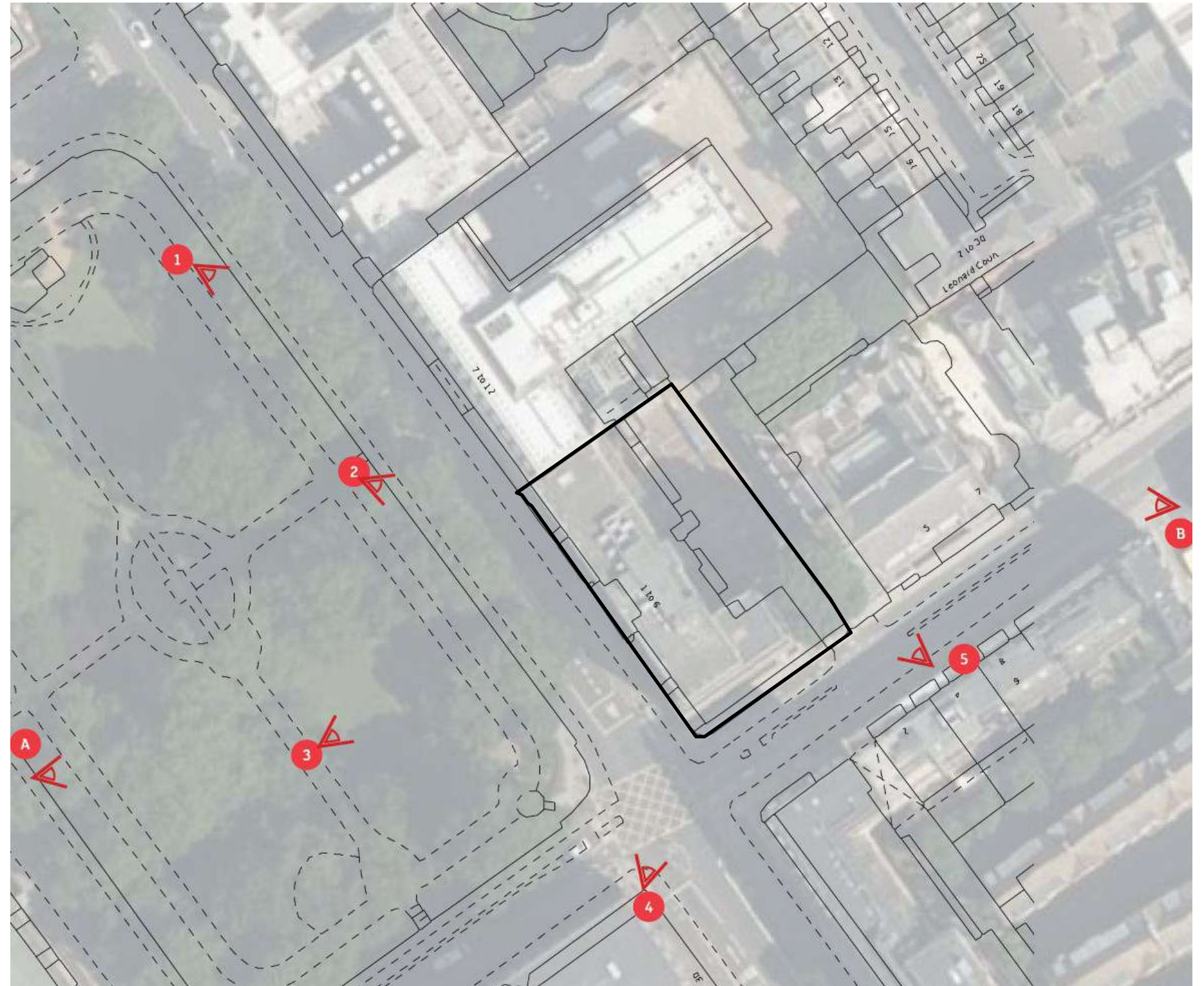


Figure 18: Viewpoint locations

Townscape Impact Assessment: View 1

Existing

This viewpoint is located to the north of Tavis House, near to the north corner of Tavistock Square, and looks south along the eastern edge of the square towards the front elevation of Tavis House. The view incorporates contrasting elements of the townscape: on the left-hand side large, sheer-fronted, multi-plot structures from the early and mid 20th century, including the Grade II listed BMA, predominate, whilst on the right-hand side hard build lines are effectively broken up and screened by the mature trees and vegetation of the late Georgian garden of Tavistock Square.

Approved

The only perceivable proposed changes that would be visible in this view are those affecting the main entrance. There would be no discernible change in massing or scale, and the proposed entrance represents a considered, contextual and high quality addition to the townscape of Tavistock Square.

Section 73 Amendments

The scale and nature of the proposed changes would not result in perceivable change to the asset's massing, scale or contribution to the townscape. The oblique angle of view and distance limit appreciation of any change from detailed design.



Townscape Impact Assessment: View 2

Existing

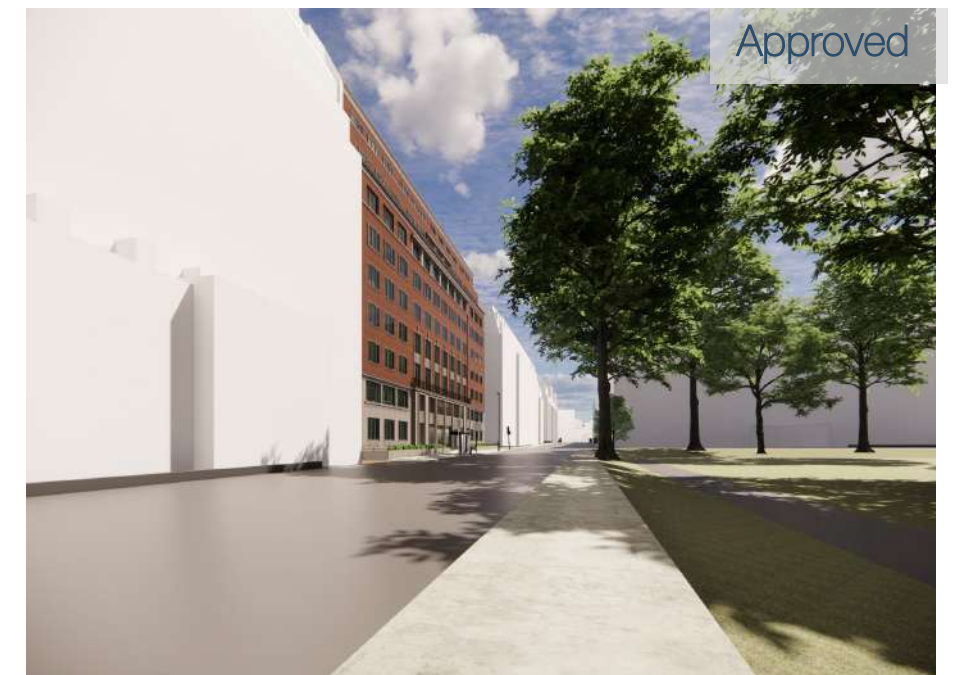
As with Townscape View 1, this view is defined by the hard build lines of the structures on the left-hand side of Tavistock Square and the contrasting soft edges of the trees and mature vegetation of Tavistock Square gardens on the right-hand side. The viewpoint has moved further south towards Tavis House, which now has greater focus in the view and aspects of the frontage's form and detail become more apparent, though it is still experienced incidentally as part of the wider townscape.

Approved

Again, the only proposed changes that would be readily visible in this view are those affecting the main entrance. High level change to the cornice at eighth floor level may be apparent although this would be barely discernible due to the height and set-back nature of that floor. The magnitude of change in this view would therefore be minimal, and the changes that are occurring represent considered, contextual and high quality additions to the townscape of Tavistock Square.

Section 73 Amendments

The scale and nature of the proposed changes would not result in perceivable change to the asset's massing, scale or contribution to the townscape. The oblique angle of view and distance limit appreciation of any change from detailed design.



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.



Townscape Impact Assessment: Verified View 1

Existing

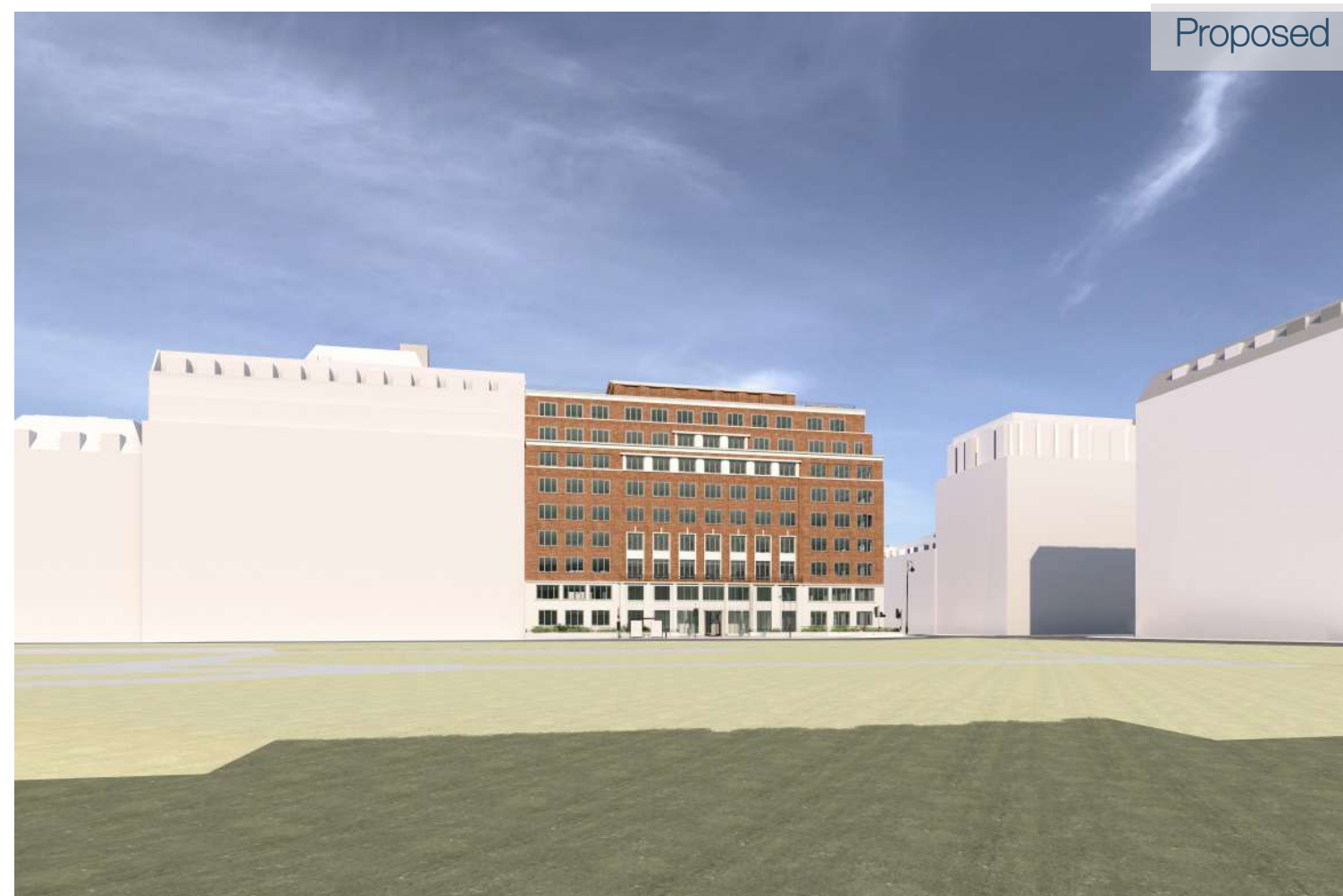
Verified View 1 is located on the opposite side of Tavistock Square to the west of Tavis House. The forms and details that comprise the front elevation and the rooftop access structure are clearly legible in this view. In this view Tavis House is experienced as part of a townscape comprising other large 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

Policy Compliance & Conclusions

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 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.*