

03 May 2024

Christopher Smith
Planning Solutions Team
London Borough of Camden
5 Pancras Square
London
WC1H 9JE

30 King's Bench Street
London
SE1 0QX

Dear Christopher,

Formal Objection to the Redevelopment of 1-6 Tavis House, Tavistock Square,
London WC1H 9NA

On behalf of the landowner of Mary Ward House, we are writing to formally
object to the planning application ref: 2024/1267/P at the above address, which
proposes amendments to the planning permission approved in December 2023
(ref: 2021/6105/P).

The approved application description of development for planning application
2021/6105/P is:

'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 hard and soft
landscaping and other ancillary works'.

The Section 73 Minor Material Amendment application (ref: 2024/1267/P)
proposed description of development is:

Minor Material Amendment through the variation of conditions 2, 9, 13 and 15 to
planning permission 2021/6105/P dated 01/12/2023 (for refurbishment and
extension of existing building) to provide amendments to external rear facades,
rooftop plant and other associated works.

The proposed changes include changing the proposed use of the building from
offices to Class E lab enabled space for Life Sciences. The proposed changes
involve alterations to the rear façade which is adjacent to Mary Ward House
and at roof level. It is understood that the proposal does not alter the approved
GIA floor areas that were approved under the original planning permission.

These proposed changes include:

- 9th floor will change to a roof top internal floor to accommodate plant
equipment
- 8th floor terrace will change to a winter garden with additional external plant

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- The design of the rear infill façade has been adapted to suit new laboratory spaces (such as window openings that maximise daylight and limit solar gain – raised cill height)
- Roof top plant with acoustic screening will be integrated into façade design
- All floors changed to lab-enabled offices (more ventilation and fume extraction systems are therefore required – larger plants allocated to roof area)
- Landscape amended to accommodate lab-specific servicing and goods entry (primary access at the rear adjacent to Mary Ward House, to include enough space for vehicles to turn)

After reviewing the current Section 73 application, we have several concerns with the proposals that are likely to have a negative impact on the neighbouring Grade I Listed Building; Mary Ward House. The key concerns associated with the proposed alterations include:

- The further impact of the proposed alterations to the rear façade and yard on the setting of the Grade I Listed Building (Mary Ward House).
- The use of the rear yard to accommodate servicing and deliveries associated with labs and the disruption caused by the construction works.
- Noise pollution generated from the additional plant equipment and the negative visual impact of the acoustic screening on the setting of a Grade I Listed Building.
- Pre-application engagement undertaken by the applicant both prior to the original application being submitted and subsequently on the amendment application.

Mary Ward House, located directly adjacent to the proposed development, is a historical landmark that is deeply committed to serving the community through educational programmes and cultural events. As noted in the Heritage and Townscape Statement, the building has an impressive Arts and Craft design, degree of preservation and its original social purpose make it a building of high significance. Mary Ward House has a long history of making a valuable contribution to society and the local community, with a particular focus on arts, culture and education.

The space currently offers affordable meeting rooms, conference facilities and office spaces for Government bodies and charitable organisations that are dedicated to strengthen the knowledge of those interested in arts, culture, education and social welfare. Mary Ward House is governed by its aim to foster community cohesion, promote inclusivity, and improve the quality of life for all local residents.

The key concerns associated with this planning application are explained in detail in this section below.

The impact of the proposed alterations to the rear façade and yard on the setting of the Grade I Listed Building (Mary Ward House)

Paragraph 200 of the NPPF (2023) states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.

Paragraph 205 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.

Policy HC1 of the London Plan (2021) 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.

Policy D2 of the adopted Camden Local Plan (2017) states the importance of designated heritage assets including listed buildings and that the Council will not permit the loss of or substantial harm to a designated heritage asset.

It is welcomed that a Heritage and Townscape Statement (HTS) has been submitted with this amendments application which assesses the impact of the changes to the rear façade of Tavis House on the setting of Mary Ward House, compared to the existing and approved design. However, the HTS only includes two views for this assessment referenced as 'View 5' and 'Verified View 2', both from Tavistock Place.

The HTS indicates that 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. The submitted Cover Letter states that the HTS concludes that given the nature and scale of the proposed amendments to the approved design, these are not considered to cause an increase or variance to the impact on the setting of listed buildings in the wider context which was considered acceptable in the original HTS.

Whilst the HTS has reviewed the impacts of the proposed amendments on Mary Ward House from the viewpoints on Tavistock Place, they have not assessed the direct relationship between the proposed rear façade of Tavis House with the western elevation of Mary Ward House, which is an important part of the setting of the Grade I Listed Building. This should be reviewed and included in the HTS.

The HTS states that 'View 5' from Tavistock Place with the proposed amendments to the façade in place would enhance the townscape and result in an appropriate backdrop for Mary Ward House. It also states that the proposed amended scheme presents less change than the approved scheme. The HTS further states that 'Verified View 2' from Tavistock Place offers an enhanced contribution to the townscape and to the setting and significance of the adjacent Mary Ward House. It is not clear from the assessment how this conclusion has been formed and further information must be provided to demonstrate how the

proposed rear façade positively responds to the architectural significance of Mary Ward House.

The proposed plant acoustic screening at the top of the rear/eastern façade of Tavis House is more visually intrusive when compared to the approved design for the office use, therefore we do not agree with the statements that the proposals will enhance the setting of the Grade I Listed Mary Ward House and will present less change than the approved scheme. We would urge the applicant to review the design of this façade to respect and positively respond to the setting of the Grade I Listed Building. The views assessments are also helpfully obscured by a tree in full bloom but the assessment should include a 'Winter' option when there are no leaves on the tree to represent a true representation of the view.

The HTS notes the importance of the access and service area to the rear of Tavis House which currently detracts from the setting of Mary Ward House. The proposed design for the yard area is therefore important and must also be assessed as part of the HTS. The proposed amendments include the provision of external plant and storage for the labs in the rear yard which would be located adjacent to Mary Ward House. It is acknowledged that the proposals seek to screen this plant by proposing green walls for the sub-station which is welcomed, but these proposals should be reviewed and shown in more detail and discussed with the occupants of Mary Ward House. Other considerations such as noise from the plant should also be discussed with surrounding occupiers to provide comfort that this use will not be disruptive, instead of relying on the submitted Noise Assessment to demonstrate this.

It is also noted in the submitted DAS that the extent of landscaped planting proposed in the yard has been reduced to accommodate additional services. The original permission included a larger planting buffer on the Mary Ward House edge. It is noted there is still perimeter planting proposed but the approved scheme provided more planting which is important given the setting of the Grade I Listed Building. This planting should be reintroduced which will also help to screen the substation.

The use of the rear yard to accommodate servicing and deliveries associated with labs and the disruption caused by the construction works

The proposed amendments include an expansion of services to the rear yard to accommodate the servicing required for the labs when compared to the approved office use. The proposals now include a double height opening on the rear façade to allow vehicles to turn in the yard. Whilst it is acknowledged the site has a separate access to that of Mary Ward House, the additional trips and increased operations of the yard may cause disruption to the users of Mary Ward House. We therefore strongly advise that the operations of the servicing and deliveries are discussed with the occupiers of Mary Ward House to mitigate and manage any negative impacts.

A Construction Management Plan proforma has been submitted with the

planning application. It is noted that construction traffic for loading and unloading will take place in the rear yard adjacent to Mary Ward House. Within this yard, a site office and staff welfare facilities, a waste skip, materials and plant storage area and a turning area for goods deliveries will be accommodated. We have concerns with the operations during the construction period and how this will impact Mary Ward House. Whilst it is acknowledged that a Construction Management Plan (CMP) hasn't been drafted in full yet, it will be extremely important to engage with the occupiers of Mary Ward House and surrounding properties to ensure that minimal disruption is caused during the construction process. A planning condition requesting the submission of a CMP and the details of the consultation process must be included in any future planning permission on this site.

Camden Council request that a neighbourhood consultation process must have been undertaken prior to submission of the CMP first draft and that at least two or more meetings with local neighbours will be required. We would urge the applicant to engage with the occupiers of Mary Ward House to discuss the construction proposals, timescales and impacts in more detail, and to involve them in the drafting of the CMP. Details of meetings including minutes, lists of attendees and actions should be appended to the CMP.

Noise pollution generated from the additional plant equipment and the negative visual impact of the acoustic screening on the setting of a Grade I Listed Building

Potential noise from the additional external plant proposed at the 8th/9th storey of the proposed development and the substation within the yard should be discussed with the occupiers of Mary Ward House to satisfy any concerns they have regarding noise. It is noted that a Noise Assessment has been submitted with the amendments application and it states that mitigation measures will be in place to manage this through the use of acoustic screens and appropriate plant location to minimise noise levels.

Whilst it is recognised that the main change to the top of the rear/eastern façade of Tavis House is the plant screening, the design of the screening is more visually intrusive when compared to the approved design and does not complement or blend in with the design of Mary Ward House. The proposed screening therefore has a negative visual impact on the setting of the Grade I Listed Building and should be reviewed to choose a more sympathetic design.

Pre-application engagement undertaken by the applicant both prior to the original application being submitted and subsequently on the amendment application

The submitted Cover Letter states that a programme of consultation in February and early March 2024 has been undertaken and the applicant sought to contact the following local stakeholders to inform them of the proposals:

- Ward Councillors

- Bloomsbury Conservation Area Advisory Committee (BCAAC)
- Local Businesses including Mary Ward House
- Local Residents along Burton Street

The Cover Letter states that there has been limited concern or interest in the proposed amendments at Tavis House. It is unclear if this is accurate and we cannot review the evidence of this as there is no Statement of Community Involvement that has been submitted with the application or it has not been uploaded to Camden Council's website. The occupiers of Mary Ward House have significant concerns with the proposed amendments, including the use of the rear yard during the construction and operational phases and the impact of the proposed amended façade on the setting of the Grade I Listed Mary Ward House. We strongly urge the applicant to further engage with the surrounding neighbours such as Mary Ward House and to provide evidence of these discussions.

To summarise and as previously noted in this letter, after reviewing the current Section 73 application, we have several concerns with the proposals that are likely to have a negative impact on the neighbouring Grade I Listed Building; Mary Ward House. The key concerns associated with the proposed alterations include:

- The further impact of the proposed alterations to the rear façade and yard on the setting of the Grade I Listed Building (Mary Ward House).
- The use of the rear yard to accommodate servicing and deliveries associated with labs and the disruption caused by the construction works.
- Noise pollution generated from the additional plant equipment and the negative visual impact of the acoustic screening on the setting of a Grade I Listed Building.
- Pre-application engagement undertaken by the applicant both prior to the original application being submitted and subsequently on the amendment application.

We would welcome further discussion and engagement on this planning application to ensure the proposals are sensitive to the setting and the use of the Grade I Listed Mary Ward House.

Yours sincerely
For Tibbalds Planning and Urban Design