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By email only

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29/05/2024

To Whom it may concern,

**RE: Formal Objection to the Redevelopment of Tavis House, Planning Reference 2024/1267/P**

1. I am writing to formally register my formal objection to the above planning application which proposes, amongst other matters, substantial demolition, amendments to external rear facades, a new rooftop pavilion, rooftop plant equipment, and amendments to the overall massing of the building. These proposed changes pose grave concerns for the operations and integrity of Mary Ward House. As a key stakeholder in the vicinity, it is imperative that my objections are thoroughly considered and addressed in the planning process. The proposed alterations not only risk compromising the historical and architectural significance of Mary Ward House but also have the potential to disrupt the surrounding environment and community. I urge the planning authorities to carefully review and assess the impact of the proposed development on the heritage, functionality, and character of the area, and to prioritize the preservation and protection of Mary Ward House and its surroundings.
2. Established in 1898, Mary Ward House is a Grade 1 Listed Building which is dedicated to philanthropy and social well-being, making a significant contribution to society and the local community.
3. Throughout this formal objection letter, it is crucial to emphasize that the true value of Mary Ward House, a Grade I listed building, lies in its continued active use, not merely in its preservation. The significance of this historic asset is deeply rooted in its active role within the community. If Mary Ward House is not able to function as a vibrant, dynamic hub, its cultural importance is severely undermined. This is not just a matter of maintaining a building; it is about preserving its integral role as a living, breathing part of the community.
4. The continued active use of Mary Ward House is essential. Without it, the building's connection to the community is eroded, diminishing its cultural and historical value. It is through its active engagement with the public, its educational programs, and its community activities that Mary Ward House maintains its relevance and importance. Any development that threatens this active use is

not just a threat to the building itself, but to the very fabric of the community it serves. Therefore, it is imperative that any proposed development around Mary Ward House supports and enhances its ongoing, active use to ensure that it remains a vital and cherished part of our community

5. The ethos which served as the enabler of an ideal remains in place today as we seek to promote knowledge learning and communication. Our central ethos revolves around the following key areas<sup>1</sup>:

5.1. Advancement of Education through the Establishment and Maintenance of a Grade 1 Listed Building/Museum: Mary Ward House stands as a testament to the advancement of education. As a Grade 1 Listed Building, it serves not only as a historical landmark but also as a museum of sorts, preserving the heritage and culture of our community. The building itself is an educational resource, providing insight into architectural history and design.

5.2. Advancement of Education through Philanthropic Provision of Subsidized Space: We support all government bodies, public sector entities and charitable organizations by providing subsidized space for knowledge learning and dissemination. This includes offering affordable meeting rooms, conference facilities, and office spaces to organizations dedicated to education, arts, culture, and social welfare. By doing so, we contribute to the broader educational landscape and facilitate the work of various charitable entities.

5.3. Servicing the Community: Mary Ward House is deeply committed to serving the community. We provide space for public sector bodies and charities which offer a wide range of services and support to individuals and groups, both within the local area and from all areas of the UK. This includes educational programs, arts and cultural events, community engagement activities etc Our aim is to foster community cohesion, promote inclusivity, and improve the quality of life for all residents.

- 5.3.1. As a timely example, on the date of writing (25 April 2024) the planning objection, we received the following feedback posted publicly online:

*"empowerHER is a charity which provides peer based support and community to girls 24 and younger and who have been bereaved of their Mothers. Every year on Mother's Day we hold an event for these girls to come too to be together and to be celebrated and treated on a day which can feel quite isolating. We serve girls and families from all areas of the UK and all backgrounds, with no cost to the families. We were so lucky this year to be able to hold this event at Mary Ward House in Bloomsbury who donated their main hall as well as staff for the day to host and support our event. The space is stunning, and was perfect for girls coming in from across the UK to Euston station. The girls took part in crafts, sharing activities, vision boards and yoga, I have no doubt of the impact that the day retreat which we held at Mary Ward House will have had in these in reinforcing the message that they are not alone."*

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<sup>1</sup> <https://www.marywardhouse.com/servicing-the-community>

## Listed Architectural Features

6. The potential impacts on daylight, sunlight, and Listed Architectural Features have not been sufficiently addressed in the application. These factors are critical to preserving the setting of a listed building and must be given due consideration in any planning decision. The alteration of natural light conditions can profoundly affect the ambiance and aesthetic value of Mary Ward House, compromising its historical significance, architectural features and visual appeal. Additionally, any changes to Listed Architectural Features risk diminishing the architectural integrity and authenticity of the building, undermining its status as a cherished cultural asset. It is essential that these concerns are thoroughly evaluated and addressed to ensure that any proposed development respects and preserves the unique character and heritage of Mary Ward House for future generations to appreciate and enjoy.
7. The design and heritage impact of the proposed extensions and massing also raise significant concerns. Mary Ward House is a building of historical and architectural significance, and any alterations must be carefully evaluated to ensure they do not compromise its integrity or detract from its heritage value. Any proposed extensions and massing should be harmonious with the existing architecture, respecting the building's unique character and contributing positively to its overall aesthetic and cultural importance. It is imperative that thorough assessments are conducted to understand the potential impact of these extensions on the historic fabric of Mary Ward House and to ensure that any proposed changes uphold its heritage value for present and future generations.

## National Planning Policy Framework (NPPF)

8. "Paragraph 200.

*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. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary."*

- 8.1. The Applicant has failed to describe the significance of Mary Ward House Ltd, including the contribution it makes to the setting of the conservation area. The level of detail provided by the applicant is in no way acceptable. Critically, it fails to address the primary architectural and historical reasons for the listing.
- 8.2. Mary Ward House, completed in 1898, was designed to be a settlement house for women in need. The building's purpose was to provide a space for educational and social activities, empowering women and improving their living conditions. Smith and Brewer's design for the Mary Ward House reflects their commitment to merging modern functionality with a deep respect for the past.<sup>2</sup>
- 8.3. Perhaps one of the most remarkable features of the Mary Ward House is the use of large, expansive windows. This was a novel approach at the time, allowing for an abundance of natural light to flood the interior spaces. The careful placement of these windows not only improved the quality of life for the women using the facility but also added a sense of modernity to the

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<sup>2</sup> Mary Ward House Trust

design<sup>34</sup>. They play a pivotal role in both the architectural features and the historical use of the building for lectures and education.

- 8.4. The potential impacts on daylight, sunlight, and Listed Architectural Features have not been sufficiently addressed in the application. These factors are critical to preserving the setting of a listed building and must be given due consideration in any planning decision. The alteration of natural light conditions can profoundly affect the ambiance and aesthetic value of Mary Ward House, compromising its historical significance, architectural features and visual appeal. Additionally, any changes to Listed Architectural Features risk diminishing the architectural integrity and authenticity of the building, undermining its status as a cherished cultural asset. It is essential that these concerns are thoroughly evaluated and addressed to ensure that any proposed development respects and preserves the unique character and heritage of Mary Ward House for future generations to appreciate and enjoy.
- 8.5. The design and heritage impact of the proposed extensions and massing also raise significant concerns. Mary Ward House is a building of historical and architectural significance, and any alterations must be carefully evaluated to ensure they do not compromise its integrity or detract from its heritage value. Any proposed extensions and massing should be harmonious with the existing architecture, respecting the building's unique character and contributing positively to its overall aesthetic and cultural importance. It is imperative that thorough assessments are conducted to understand the potential impact of these extensions on the historic fabric of Mary Ward House and to ensure that any proposed changes uphold its heritage value for present and future generations.
- 8.6. Dunbar Smith and Cecil Brewer were architects ahead of their time, known for their innovative designs that seamlessly blended traditional and modern elements. Their collaborative work on iconic buildings like the Mary Ward House in London showcases their commitment to architectural excellence and their dedication to creating spaces that are both functional and aesthetically captivating. Their influence on the architectural world has left a lasting mark, and their work continues to inspire architects and admirers of design to this day. Dunbar Smith and Cecil Brewer, while perhaps not household names, are celebrated in the world of architecture for their remarkable contributions and their innovative spirit that transcends time and place.
- 8.7. Paragraph 200 of the National Planning Policy Framework (NPPF) emphasizes the paramount importance of conserving the significance of heritage assets, including their setting and historic use. The failure of the Applicant to adequately address Paragraph 200 is deeply concerning. These omissions directly undermine the requirements set forth in the NPPF to assess and articulate the significance of any heritage assets affected by the proposed development.
- 8.8. The historical functional space and use of Mary Ward House, a cherished heritage asset, are undeniably jeopardized by this application. The proposed alterations, including substantial demolition, amendments to external facades, and the introduction of a new rooftop pavilion, threaten to disrupt the integrity and authenticity of the building's historic use. Moreover, the inadequate consideration given to the significance of these heritage assets and their setting further exacerbates the risk posed by the proposed development.
- 8.9. By failing to describe the significance of the heritage assets affected, including any contribution made by their setting, the Applicant has neglected their duty to safeguard the heritage value of Mary Ward House. This neglect is in direct contravention of the principles outlined in paragraph

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<sup>3</sup> Mary Ward House Trust.

<sup>4</sup> Light is such a fundamental and important part of the design of building, and it's been given no consideration save to say that the loss of light is acceptable. The report on light does not deal with the key features of the listing. This needs to be dealt with separately under failings to provide the necessary reports.

200 of the NPPF, which require thorough consideration and protection of the historic environment.

- 8.10. In light of these significant shortcomings, it is imperative that the council rejects the planning application under Paragraph 200 of the NPPF. The preservation of Mary Ward House's historical functional space and use, along with its setting and significance as a heritage asset, must take precedence over any proposed development that fails to adequately address these critical concerns.

8.11. "Paragraph 201.

*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."*

- 8.11.1. We kindly request that the local planning authority confirm its compliance with Paragraph 201 of the National Planning Policy Framework (NPPF). This paragraph stipulates that where a decision-maker determines that a proposed development will lead to substantial harm to or loss of significance of a designated heritage asset, the proposal should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that there are no reasonable alternative means to deliver those benefits. Given the significant heritage value of Mary Ward House and the potential impact of the proposed development on its significance, it is crucial that the local planning authority provides assurance that Paragraph 201 has been thoroughly considered in the evaluation of the planning application. Confirmation of compliance with this provision will ensure that the decision-making process aligns with the principles of protecting and preserving our built heritage for future generations.

- 8.11.2. Please confirm if the LPA has complied with this requirement for planning application reference 2021\_6105\_P and provide a copy of the report.

8.12. "Paragraph 203.

*In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness."*

- 8.12.1. With reference to paragraph 203 of the National Planning Policy Framework (NPPF), the local planning authority (LPA) is urged to prioritize the sustainability and enhancement of the use of heritage assets consistent with their conservation. However, the proposed development presents significant challenges to sustaining the use of Mary Ward House as a space for knowledge learning and dissemination.

- 8.12.2. Firstly, the application lacks crucial details regarding the potential impacts on sound, noise, and chemical use in the final proposed use. This lack of information raises serious

concerns about the compatibility of the development with the sensitive nature of the heritage asset and its intended use.

8.12.3. Additionally, the projected duration of the development, ranging from 60 to 156 weeks, exacerbates the issue. The issue of noise and vibration must be carefully considered, not solely in terms of actual decibel output but also in the perceived output within this heritage and conservation setting. It is evident that no rational member of the public, public sector body, or charity would choose to book space for knowledge learning and dissemination adjacent to a massive construction site. Therefore, it is imperative that the LPA thoroughly assesses these concerns and ensures that any proposed development aligns with the conservation and sustainable use objectives outlined in paragraph 203 of the NPPF.

8.12.3.1. The LPA ought to remember that Mary Ward House was placed on the Listed Buildings at Risk Register in 2002. Ensuring sustainable interaction with the local community and ensuring economic vitality is critical to ensuring the future of Mary Ward House.

8.12.3.2. In 2002, Mary Ward House was placed on the Listed Buildings at Risk Register, highlighting the urgent need for restoration and maintenance. Unfortunately, the Mary Ward House Trust at that time was unsuccessful in securing lottery funding, leaving the building vulnerable to further decay and deterioration.

8.12.3.3. Since then, considerable efforts have been made to restore and maintain Mary Ward House. The building has undergone painstaking renovation to ensure its preservation as an essential part of our National Heritage. Despite financial challenges, we have been dedicated to this cause, recognizing the vital role Mary Ward House plays in promoting learning, knowledge dissemination, and equality.

8.12.3.4. Given the ongoing maintenance restoration efforts and the importance of Mary Ward House in advancing education, arts, culture, and social welfare, we urge the LPA to consider the impact of the proposed development on our historic building and its mission. Any disruptions caused by the construction would be catastrophic and ultimately hinder our ability to fulfill our objectives and jeopardize the integrity of this valuable asset.

#### 8.13. "Paragraph 205.

*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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*

8.13.1. In accordance with paragraph 205 of the National Planning Policy Framework (NPPF), we urgently plead with the local planning authority (LPA) to acknowledge and prioritize the Grade 1 Listed status of Mary Ward House when evaluating the impact of the proposed development on the significance of this cherished heritage asset and its conservation. The historical and architectural importance of Mary Ward House cannot be overstated, and as such, it deserves the utmost weighted importance in any decision-making process regarding development within its vicinity. It is imperative that the LPA recognizes the irreplaceable value of this heritage asset and ensures that any proposed development does not compromise its significance or integrity.

8.13.2. Furthermore, the proposed development presents an imminent threat to Mary Ward House, with potentially catastrophic consequences. The proposed changes could



irreversibly alter the character and fabric of this historic building, undermining its cultural and architectural significance. Such a disregard for the preservation of Mary Ward House's heritage is deeply troubling and cannot be overlooked.

8.13.3. Moreover, there has been a grave dereliction of duty on the part of LB Camden in granting planning permission to the 2021 development application. This failure must not be repeated in the context of the current planning application. There is a glaring absence of evidence demonstrating that LB Camden has fulfilled its legal obligations in this regard. Therefore, we implore LB Camden to acknowledge any legal errors made in granting planning application X and to take immediate steps to rectify the situation.

8.13.4. In conclusion, we urge the LPA to uphold the Grade 1 Listed status of Mary Ward House as a matter of paramount importance and to reject any development proposals that pose a threat to its significance and conservation. It is incumbent upon LB Camden to fulfill its obligations and protect this invaluable heritage asset for the benefit of current and future generations.

8.14. "Paragraph 206

*Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

8.14.1. According to Paragraph 206 of the National Planning Policy Framework (NPPF), it is imperative that any proposed development thoroughly considers and justifies its potential impact on the sustainability and enhancement of Mary Ward House's significance. However, the current application fails to provide any clear or convincing justification for the dire ramifications that sustaining and enhancing the significance of Mary Ward House may entail.

8.14.2. Paragraph 200 of the NPPF, which requires careful consideration of substantial harm or loss to designated heritage assets, has not been discharged adequately in this case. The Planning application lacks sufficient evidence or rationale to assess the extent of harm or loss that may result from the proposed development. Consequently, the Planning application cannot reasonably, fairly, and accurately fulfill its obligations under paragraph 206 of the NPPF.

8.14.3. Furthermore, the failure to provide a clear and convincing justification undermines the ability of the local planning authority to make an informed decision regarding the sustainability and enhancement of Mary Ward House. Without a thorough understanding of the potential ramifications, the LPA cannot adequately protect and preserve this significant heritage asset.

8.14.4. Therefore, it is imperative that the Planning application undergoes rigorous scrutiny to ensure that all relevant policies and obligations under the NPPF are adequately addressed. Failure to do so would constitute a serious oversight and may lead to irreparable harm to the significance and integrity of Mary Ward House.

8.15. "Paragraph 207"

*Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent".*

8.15.1. According to paragraph 207 of the National Planning Policy Framework (NPPF), if it is a matter of fact that a proposed development will lead to substantial harm to a designated heritage asset, the local planning authority (LPA) is lawfully required to refuse consent. In the case of the proposed development, it is indisputable that significant harm will be inflicted upon Mary Ward House. The alterations and additions outlined in the application, including substantial demolition, changes to external facades, and the introduction of new structures, will irreversibly compromise the historical and architectural integrity of Mary Ward House. This substantial harm is evident in the potential loss of historic fabric, the alteration of key architectural features, and the disruption of the building's original design and use.

8.15.2. Therefore, in accordance with paragraph 207 of the NPPF, the LPA is duty-bound to refuse consent for the proposed development due to the undeniable and substantial harm it will inflict upon Mary Ward House. Any approval of the application would not only contravene statutory obligations but also undermine the fundamental principles of heritage conservation and protection outlined in national planning policy.

8.16. "Paragraph 208"

*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

8.16.1. In accordance with paragraph 208 of the National Planning Policy Framework (NPPF), it is imperative to highlight that the proposed development will undoubtedly lead to substantial harm to Mary Ward House. The alterations and additions outlined in the application, including substantial demolition, changes to external facades, and the introduction of new structures, will irreversibly compromise the historical and architectural integrity of this cherished heritage asset. Mary Ward House holds immense cultural significance, and any harm inflicted upon it would be a loss not only to the local community but also to the nation's heritage as a whole.

8.16.2. However, in the unlikely event that the LPA disregards the substantial harm posed by the proposed development and deems it to result in less than substantial harm, it is crucial to weigh this harm against the purported public benefits of the proposal. The optimum viable use of Mary Ward House, which is as it is currently used, serves as a beacon of heritage preservation and community engagement. This use not only maintains the historical significance of the building but also ensures its continued conservation and relevance to the community. Conversely, the applicant has failed to provide any justifiable public benefit that outweighs the destruction of our heritage. Therefore, it is imperative that the LPA carefully considers the true extent of harm posed by the proposed development and prioritizes the conservation and sustainable use of Mary Ward House for the benefit of present and future generations.



8.17. "Paragraph 211

*Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted."*

8.17.1. In accordance with paragraph 211 of the National Planning Policy Framework (NPPF), we express our profound outrage and incandescence at the utter lack of meaningful record or advance understanding demonstrated by the applicant and developer regarding the significance of Mary Ward House. As a Grade 1 Heritage Asset of immense cultural and historical importance, Mary Ward House deserves the utmost respect and consideration in any proposed development. However, we have witnessed no evidence of the applicant's efforts to comprehensively document and acknowledge the significance of this iconic landmark.

8.17.2. Furthermore, there has been a glaring absence of contemporaneous proofs indicating that any such evidence has been made public in a suitable manner. The failure to disseminate information regarding the significance of Mary Ward House not only demonstrates a disregard for transparency and public engagement but also undermines the principles of heritage conservation and protection outlined in the NPPF. Such negligence on the part of the applicant and developer is reprehensible and unacceptable.

8.17.3. We vehemently implore the local planning authority to address this egregious oversight and demand that the applicant and developer provide a comprehensive and publicly accessible record of the significance of Mary Ward House in accordance with paragraph 211 of the NPPF. Failure to do so would constitute a serious dereliction of duty and would compromise the integrity of the planning process. Mary Ward House is a treasure of our cultural heritage, and it is imperative that its significance is properly acknowledged and respected in any proposed development.

**The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition):**

9. Cumulative Change:

9.1. The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) states:

9.2. *"Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it (see also paragraph 40 for screening of intrusive developments)."*<sup>5</sup>

9.3. It is imperative to emphasize that the proposed development fails to adequately address the issue of cumulative change. Mary Ward House has already experienced encroachment from the adjacent Tavis House development. This new application seeks to further increase massing,

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<sup>5</sup> <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

exacerbating the existing problem of encroachment and cumulative impact on the setting of a listed building.

- 9.4. Moreover, consideration must be given to the historic use of the development site. Tavis House, situated on the same lands as Mary Ward House and owned by the Bedford Estates, has historically operated in alignment with similar ideals as Mary Ward House. It has primarily accommodated public services, maintaining a use that respects the cultural and historical context of the conservation area. The proposed change of use for matters of financial gain represents a significant departure from this historical precedent, further undermining the conservation area and the setting of the listed building.
- 9.5. The failure of the proposed development to adequately address the issue of cumulative change poses a serious threat to the integrity and significance of Mary Ward House and its surroundings. It is imperative that the local planning authority carefully considers the cumulative impact of developments in the vicinity and rejects proposals that would compromise the setting and heritage value of this cherished listed building. Failure to do so would represent a dereliction of duty and a failure to uphold best practices in heritage conservation and planning.

#### 10. Economic Viability (and Loss of Jobs)

- 10.1. The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) states:

*“Sustainable development under the NPPF can have important positive impacts on heritage assets and their settings... However, the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development”*

- 10.2. 10.1. The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) also includes “Economic Viability” in its checklist of the potential attributes of a development affecting setting that may help to elucidate its implications for the significance of the heritage.
- 10.3. In accordance with HM Government's advice on enhancing and conserving the historic environment, we urgently plead with the local planning authority to consider the critical importance of preserving the significance and use of heritage assets. Developments that materially detract from the asset's significance and use not only pose an immediate threat to its cultural and historical value but also jeopardize its economic viability, both now and in the future. It is imperative that the local planning authority comprehensively assesses the long-term implications of proposed developments on the economic sustainability of heritage assets.
- 10.4. Heritage assets, such as Mary Ward House, are not only repositories of our cultural heritage but also valuable economic assets that contribute to the vitality and identity of our communities. Any development that undermines the significance and use of these assets not only diminishes their cultural value but also threatens their economic viability. The loss of economic viability can have far-reaching consequences, including diminished opportunities for sustainable conservation and adaptive reuse, as well as decreased investment and tourism potential.
- 10.5. Furthermore, the economic sustainability of heritage assets is intricately linked to their ongoing conservation. Without adequate economic resources, it becomes increasingly challenging to implement necessary conservation measures and maintain the integrity of these

assets over time. Therefore, the local planning authority must recognize that developments which compromise the economic viability of heritage assets also jeopardize their long-term conservation and sustainability.

10.6. If the planning proceeds as currently proposed, the development will have ruinous consequences for Mary Ward House. This will not only result in the irrevocable loss of an invaluable heritage asset but will also lead to significant job losses. The damage to Mary Ward House will be profound and irreversible, compromising its historical significance and potentially its structural integrity. The associated loss of heritage and jobs is not a mere possibility—it is a matter of certainty!! This development threatens to dismantle a cornerstone of our community, eroding the cultural and economic fabric that Mary Ward House supports. The preservation of this vital asset must take precedence to prevent such a devastating outcome.

10.7. We implore the local planning authority to prioritize the preservation of the significance and use of heritage assets and to reject any developments that pose a threat to their economic viability. Failure to do so would not only undermine the cultural and historical value of these assets but also jeopardize their long-term conservation and sustainability, to the detriment of present and future generations.

## 11. Conservation Decisions and Proportionate Assessment

11.1. Amongst the Government's planning policies for the historic environment is that conservation decisions are based on a proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to the complexity of the case, from straightforward to complex:<sup>6</sup>

*Step 1: Identify which heritage assets and their settings are affected*

*Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated*

*Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it*

*Step 4: Explore ways to maximise enhancement and avoid or minimise harm*

*Step 5: Make and document the decision and monitor outcomes*

11.2. We urgently request confirmation from the Council regarding the steps they have undertaken in assessing the setting of Mary Ward House. We demand that the Council promptly makes public and provides us with the details, written assessments, and documentation pertaining to their evaluation of the setting of this significant heritage asset. Transparency and accountability are paramount in the planning process, especially concerning the protection and preservation of invaluable heritage assets like Mary Ward House. Therefore, we insist that the Council fulfills its obligation to provide comprehensive information and documentation regarding the assessment of the setting of Mary Ward House, as outlined in the referenced guidance. Failure to do so would raise serious concerns about the Council's commitment to upholding best practices in heritage conservation and planning.

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<sup>6</sup> The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)

## PRINCIPLE OF DEVELOPMENT

### 12. Rear of the Site & Return Alterations

- 12.1. The principle of development concerning the rear of the site and return alterations necessitates thorough consideration, particularly in its potential impact on the setting of Mary Ward House and the surrounding Conservation Area. While there is acknowledgment that improvements are needed to enhance the overall setting, it is vehemently disputed that the proposed development at the rear is acceptable.
- 12.2. The Listed Gates Railings and Piers are due to be restored and will be visually less discernible against the current proposed backdrop.
- 12.3. Jon Lowe Heritage Townscape Impact Assessment seeks to argue that “the gap between Tavis House and Mary Ward House is clearly defined, and it acts as an important ‘break’ between the varied townscapes of Tavistock Place and Tavistock Square.” It is obvious from the below photographs, which are reproduced from the Townscape Impact Assessment, that no such clear gap exists.



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1.1. <sup>7</sup> Verified View 2 Jon Lowe Heritage Townscape Impact Assessment



- 12.4. Please note that we have not enlarged the picture to accentuate the hideous imposition of the façade (shown with green tiles below) which detracts from key architectural details of Mary Ward House and in particular the noteworthy listing on English Heritage of the arch windows which now appear subservient to Tavis House. These pictures are taken from and reproduced in the same size and format as Jon Lowe Heritage Townscape Impact Assessment which is available in the public domain.

## THE LONDON PLAN

### 13. POLICY D: 1 LONDON'S FORM, CHARACTER AND CAPACITY FOR GROWTH

- 13.1. As set out in Policy D1 London's form, character and capacity for growth:

"Development Plans and strategies should demonstrate a clear understanding of the heritage values of a building, site or area and its relationship with its surroundings. Through proactive management from the start of the development process, planners and developers should engage and collaborate with stakeholders so that the capital's heritage contributes positively to its future. To ensure a full and detailed understanding of the local historic environment, stakeholders should include Historic England, London's Parks and Gardens Trust, The Royal Parks, boroughs, heritage specialists, local communities and amenity societies.

- 13.2. The requirement of Policy D1 is also noted in Policy HC1, paragraph 7.1.5, which underscores the necessity for planners and developers to engage and collaborate with stakeholders throughout the conservation and development process: We refer to this further below.



#### 14. POLICY HC1: HERITAGE CONSERVATION AND GROWTH

15. Paragraph C of Policy HC1 Heritage conservation and growth 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.”*

15.1. The requirement of Policy D1 is also noted in Policy HC1, paragraph 7.1.5, which underscores the necessity for planners and developers to engage and collaborate with stakeholders throughout the conservation and development process:

15.2. With reference to Paragraph C of Policy HC1 Heritage conservation and growth, it is imperative to underscore the explicit requirement that planners and developers engage and collaborate with stakeholders to ensure that the capital's heritage contributes positively to its future. This application flagrantly violates this mandate, as evidenced by the egregious lack of engagement from both the local planning authority (LB Camden) and the developer with key stakeholders, namely English Heritage and Mary Ward House.

15.3. The policy underscores the importance of meaningful collaboration between planners, developers, and stakeholders to safeguard and enhance the heritage of London. However, in this case, LB Camden has failed to fulfill its duty to engage with stakeholders, including Mary Ward House, despite their pivotal role in the conservation and management of heritage assets. The lack of consultation not only disregards the input and expertise of stakeholders but also undermines the principles of transparency and accountability in the planning process.

15.4. Furthermore, Policy HC1 mandates that development proposals affecting heritage assets and their settings should conserve their significance by being sympathetic to their historical value and appreciation within their surroundings. This policy requires active management of the cumulative impacts of incremental change on heritage assets and their settings. The proposed development does not sufficiently address these requirements, as it fails to demonstrate how it will conserve the significance of the heritage assets it affects. There is a clear oversight in integrating heritage considerations early in the design process, which is crucial for identifying and mitigating potential harms. Instead of identifying opportunities to enhance the heritage assets, the development risks causing irreversible damage to the historic character and cultural value of the area. This approach not only violates the provisions of Policy HC1 but also jeopardizes the preservation of Camden's rich historical environment for future generations.

15.5. The developer's failure to engage with English Heritage and Mary Ward House demonstrates a blatant disregard for the importance of preserving and protecting heritage assets. By neglecting to involve key stakeholders in the development process, the developer disregards the valuable insights and perspectives that could contribute to the positive integration of heritage into the proposed development.



15.6. Paragraph 7.1.7 Heritage significance.

15.6.1. Paragraph 7.1.7 of The London Plan 2021 emphasizes the imperative of responding positively to the significance of heritage assets and their settings. Regrettably, it is evident that the applicant and developers have failed to fully comply with this guidance. Despite clear directives, there exists unequivocal evidence demonstrating their inadequate consideration of the heritage significance, local context, and character of heritage assets. Numerous developments within the Bloomsbury Conservation Area have proceeded without appropriate mitigation measures, resulting in adverse impacts on heritage assets and significant architectural disfigurements. These developments often deviate from the scale, materials, details, or form of existing heritage structures, leading to a loss of their contribution to the area's significance.

15.7. The historic litany of failures, while acknowledged not solely the fault of the Local Planning Authority (LPA), must not extend to the current development. The protection and enhancement of heritage assets, as outlined in paragraph 7.1.7, remain paramount, yet have not been achieved in this instance. Therefore, the planning authority is urged to reject this application, as it does not align with the fundamental principles of preserving and enhancing the heritage assets of the Bloomsbury Conservation Area, as stipulated in The London Plan 2021.

16. POLICY D11: SAEFTY, SECCURITY AND RISLIENCE TO EMERGENY

16.1. The proposed development at 1 - 6 Tavistock Square is in stark contravention of Policy D11 of the London Plan, which mandates stringent measures to ensure safety, security, and resilience to emergencies. This policy is critically important, especially in light of the Draft Terrorism (Protection of Premises) Bill, which will soon require strict compliance to enhance the protection of premises against terrorist threats. Policy D11 requires that development proposals maximize building resilience and minimize potential physical risks, including those arising from extreme weather, fire, flood, and related hazards. The current planning application, however, does not adequately address these essential safety and security considerations.

16.2. The lack of comprehensive measures to design out crime and terrorism within this proposal is particularly alarming. Policy D11 explicitly states that development should include measures to deter terrorism, assist in the detection of terrorist activity, and help mitigate its effects. These critical measures must be considered from the outset of the design process to ensure they are seamlessly integrated into both the development and the surrounding area. The failure to incorporate such measures not only jeopardizes the safety and security of the building's future occupants but also undermines the safety of the wider community.

16.3. Moreover, in an era where the threat of terrorism is an ever-present concern, it is irresponsible and negligent for the planning application to overlook these vital security requirements. The Draft Terrorism (Protection of Premises) Bill will impose legal obligations on premises to implement robust security measures, and any development that does not proactively incorporate these measures will be non-compliant with forthcoming legislation. The planning authority must recognize the severe implications of approving a development that fails to meet the standards set by Policy D11 and the upcoming bill, and therefore, this application should be rejected or significantly revised to ensure the utmost safety and security for all stakeholders involved.

- 16.4. The concerns pertaining to this contravention of THE LONDON PLAN POLICY D11: SAEFTY, SECCURITY AND RISLIENCE TO EMERGENY are further compounded by the complete disregard for providing an adequate Traffic Management Plan (TMP) or Construction Management Plan (CMP). Both of these plans are critical for ensuring safety, security, and resilience during the construction phase. The absence of a well-thought-out TMP and CMP raises significant concerns about the project's impact on the local infrastructure and its ability to manage and mitigate risks effectively.
- 16.5. The planned loading and unloading activities on a strategic route network will not only disrupt the flow of traffic but also impede emergency response capabilities. This strategic route network is vital for maintaining accessibility and mobility for emergency services, including fire, police, and medical responders. Any obstruction or delay caused by inadequate planning can have dire consequences in the event of an emergency. The lack of a robust TMP and CMP indicates a severe oversight in the planning process, neglecting the necessity to maintain unimpeded access for emergency services, which is essential for community safety and resilience.
- 16.6. Furthermore, the failure to address traffic and construction management issues exacerbates the overall security risks associated with the development. An ill-managed construction site can become a hotspot for accidents, congestion, and potential security breaches. The planned activities must be carefully coordinated to ensure that they do not compromise the strategic route network's functionality or the community's overall safety. The planning application must be revised to include detailed and effective traffic and construction management strategies that prioritize safety, security, and resilience, aligning with the stringent requirements of Policy D11 and the forthcoming Draft Terrorism (Protection of Premises) Bill.
- 16.7. We further refer to the serious issues of the Construction Management Plan in paragraphs 47 to 59.

#### POLICY SI 1: IMPROVING AIR QUALITY

17. The proposed development at 1 - 6 Tavistock Square is in direct contravention of Policy SI 1 of the London Plan, which is focused on improving air quality. This policy mandates that development proposals must demonstrate a clear plan to comply with the Non-Road Mobile Machinery (NRMM) Low Emission Zone and implement best practices to reduce emissions from the demolition and construction of buildings. However, the current application fails to provide a detailed strategy for managing and mitigating the air quality impacts associated with the construction and demolition phases. Without this critical information, the application does not meet the standards set out by Policy SI 1, thereby posing significant risks to local air quality and public health.
18. Furthermore, the absence of a comprehensive air quality management plan during these phases is particularly concerning given the high density of residential and commercial properties in the vicinity, as well as the presence of vulnerable populations, such as children and the elderly. The failure to address these crucial aspects not only undermines efforts to protect public health but also contradicts the broader objectives of the London Plan to promote sustainable and environmentally responsible development. The lack of compliance with the NRMM Low Emission Zone and the omission of best practice guidelines for emission reduction highlight a significant oversight in the planning application, necessitating a thorough review and substantial revisions to align with Policy SI 1 requirements.

## **CAMDEN LOCAL PLAN (2017)**

### Policy A4 Noise and Vibration

19. The Council seeks to control and manage noise and vibration. This development contravenes Policy A4 by:
- 19.1. Potentially generating unacceptable noise and vibration impacts without appropriate attenuation measures.
  - 19.2. Lacking assurance that noise-generating operations, including plant and machinery, can be conducted without harming local amenity.
  - 19.3. Not minimizing the impact on local amenity from deliveries, demolition, and construction phases, which is crucial to maintaining the quality of life for local residents.
20. The adequacy of noise protection from the proposed roof terrace and plant machinery has not been adequately demonstrated. Given the residential uses in the vicinity, it is essential that measures are in place to mitigate any potential noise disturbances effectively. The introduction of a roof terrace and plant machinery has the potential to generate significant noise pollution, which could disrupt the quality of life for nearby residents and compromise the peaceful coexistence of residential and commercial activities in the area. Therefore, it is imperative that robust noise mitigation strategies are implemented to ensure that the proposed developments do not result in undue disturbance to the surrounding community. These measures should be carefully evaluated and clearly outlined in the planning application to provide assurance that the interests of all stakeholders, including nearby residents, are adequately protected.
21. The proposed development poses a significant threat to Mary Ward House, a Grade I listed building, due to the potential generation of unacceptable vibration impacts without appropriate attenuation measures. We are deeply concerned by the absence of any vibration impact assessments, particularly given the substantial demolition and necessary underpinning or foundation activities planned. The inherent risks associated with these extensive construction efforts could lead to severe structural damage to Mary Ward House. This historic building's exceptional architectural and cultural significance demands rigorous protection from any adverse impacts. The lack of a comprehensive assessment and mitigation strategy not only contravenes Camden's policies but also endangers the integrity and preservation of this irreplaceable heritage asset. Immediate and thorough evaluation of these risks is imperative to prevent irreversible harm to Mary Ward House and ensure the safeguarding of our historical heritage.

### POLICY CC1: CLIMATE CHANGE MITIGATION

22. Policy CC1 of the Camden Local Plan 2017 emphasizes the necessity of mitigating climate change impacts through sustainable development practices. A key component of this policy is the requirement for all proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building. This provision aims to reduce the environmental footprint associated with construction activities by encouraging the conservation and adaptive reuse of existing structures. The proposed development, which involves extensive demolition work, fails to adequately justify why the existing buildings cannot be retained and improved. This lack of justification contradicts the core principles of Policy CC1 and undermines Camden's commitment to sustainable development.
23. The demolition of existing buildings and the subsequent construction process are significant contributors to carbon emissions, resource consumption, and waste generation. By not exploring or providing sufficient evidence that the current structures can be upgraded or retrofitted, the proposal overlooks the environmental benefits of conservation. Retaining and improving existing buildings

not only preserves architectural heritage but also minimizes the adverse environmental impacts associated with new construction. The failure to consider these aspects reflects a disregard for Camden's climate change mitigation strategies and sets a concerning precedent for future developments. The proposal should be revisited to explore all possible avenues for retaining and enhancing the existing buildings, in alignment with Policy CC1, to support Camden's broader sustainability goals and climate action commitments.

#### POLICY D1 DESIGN: LOCAL CONTEXT AND CHARACTER

24. Paragraph 7.2 of the Camden Local Plan state the council will require all developments to consider:

*character, setting, context and the form and scale of neighbouring buildings;*  
*the character and proportions of the existing building, where alterations and extensions are proposed;*  
*the wider historic environment and buildings, spaces and features of local historic value*

25. It is glaringly evident from the information presented herein that the applicant and developer have woefully failed to adequately consider or adhere to the requirements outlined in Paragraph 7.2 of the Camden Local Plan. This paragraph explicitly mandates that all developments must meticulously assess and address various critical aspects, including the character, setting, context, and the form and scale of neighboring buildings. Furthermore, it emphasizes the importance of considering the character and proportions of existing buildings when proposing alterations or extensions, as well as the wider historic environment and buildings, spaces, and features of local historic value.
26. The Bloomsbury Conservation Area Appraisal and Management Strategy, an adopted supplementary planning document, explicitly highlights the special interest of Mary Ward House. Paragraph 7.41 of this document places a specific obligation on the council to give special regard to preserving listed buildings. The council is expected to ensure that development not only conserves but also takes opportunities to enhance or better reveal the significance of heritage assets and their settings.
27. However, it is an incontrovertible fact that the proposed development fails to fulfill this requirement. Instead of conserving Mary Ward House, the proposed development has the opposite effect—it substantially damages a Grade 1 Listed Building. This development not only disregards the special interest and significance of Mary Ward House but also violates the council's obligation to preserve and enhance heritage assets. It undermines the integrity of the Bloomsbury Conservation Area and sets a dangerous precedent for future development within the area.
28. Therefore, it is imperative that the council upholds its responsibility to preserve and enhance heritage assets by rejecting the proposed development. Any approval of this development would be a grave dereliction of duty and a betrayal of the trust placed in the council to safeguard the cultural heritage of the Bloomsbury Conservation Area. It is essential that the council takes decisive action to protect Mary Ward House and ensure that its significance is preserved for future generations.

#### POLICY D HERITAGE: CONSERVATION AREAS

29. Policy D2 makes it a requirement to:

*"Preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage."*

30. The proposed development contravenes Policy D2 of the Camden Local Plan 2017, which aims to preserve trees and garden spaces that contribute to the character and appearance of a conservation area, as well as the setting of Camden's architectural heritage. The encroachment associated with

this development, along with the anticipated loss of sunlight and increased noise levels, poses a significant risk to these valuable green spaces. The impact of such encroachment could lead to a substantial reduction in their utility, effectively resulting in the total loss of any meaningful use of these spaces. This not only undermines the conservation area's aesthetic and historical value but also diminishes the quality of life for local residents who rely on these spaces for recreation and respite. The proposed development's failure to mitigate these impacts clearly violates the intent and provisions of Policy D2, emphasizing the need for a more considerate approach to preserving the integrity and utility of Camden's heritage and conservation areas.

#### POLICY D2 HERITAGE: LISTED BUILDING

- 30.1.1. Policy D2 of the Camden Local Plan 2017 mandates that the Council must resist any development that would cause harm to the significance of a listed building through an effect on its setting. This policy is crucial in safeguarding the historical and architectural integrity of Camden's heritage assets. The proposed development poses a significant threat to Mary Ward House, a Grade I listed building. The essence of Mary Ward House's value lies not just in its physical preservation but in its active use and contribution to the community. The building's significance is derived from its ability to serve as a vibrant and functional component of the local area, engaging with the community and maintaining its cultural relevance.
- 30.1.2. The potential impacts of the proposed development, including excessive noise, vibration from substantial demolition, and foundation works, threaten to undermine the active use of Mary Ward House. If the building cannot continue to operate as a lively part of the community due to the disruptive effects of nearby construction, its cultural importance and significance will inevitably decline. It is not enough to merely preserve the structure; its role as a dynamic part of the community must be protected. The adverse effects on Mary Ward House's setting and its ability to function as a community asset highlight a clear contravention of Policy D2. Therefore, it is imperative that Camden Council takes stringent measures to ensure that any development respects and maintains the active, significant use of this listed building, preserving its value for future generations.
- 30.1.3. In addition to the above, Paragraphs 7.57 to 7.60 deal explicitly with listed buildings, emphasizing the critical importance of their setting. Notably, paragraph 7.60 unequivocally states that "the setting of a listed building is of great importance and should not be harmed by unsympathetic neighboring development." However, it is abundantly clear that the proposed neighboring development in this case is profoundly unsympathetic to both the architectural features and historic and future use of the listed building.
- 30.1.4. The proposed development fails to respect the historical significance and architectural integrity of the listed building, imposing a visual intrusion that disrupts the harmonious relationship between the building and its surroundings. Moreover, the proposed development threatens to compromise the future use and viability of the listed building, undermining its cultural and heritage value for generations to come.
- 30.1.5. It is imperative that the planning authority recognizes the gravity of the situation and takes decisive action to prevent the proposed development from causing irreparable harm to the setting of the listed building. Any approval of the development would constitute a blatant disregard for the principles outlined in the planning guidance and a betrayal of the responsibility to protect and preserve our cultural heritage. Therefore, the planning authority must reject the proposed neighboring development in order to safeguard the integrity and significance of the listed building and uphold the principles of conservation and heritage preservation.

POLICY D2 HERITAGE: DEMOLITION IN CONSERVATION AREAS

- 30.1.6. Paragraphs 7.49 to 7.52 of the Local Plan deal with Demolition in conservation areas.
- 30.1.7. The Planning Application involves substantial demolition works - Please see Appendix 2 for a section of proposed demolition works.
- 30.1.8. It is imperative to remind Camden that applications for total or substantial demolition in conservation areas must adhere to stringent criteria. Specifically, they must demonstrate to the Council's satisfaction that effective measures will be implemented during demolition and building works to ensure the structural stability of retained parts and adjoining structures. Before planning permission for demolition is granted, the Council must be assured that acceptable detailed plans for the redevelopment are in place. We have seen no evidence that the applicant has accurately conveyed their plans for demolition.
- 30.1.9. In addition, proposals for demolition and reconstruction should be justified based on the optimization of resources and energy use when compared to the existing building. This requirement is in alignment with Policy CC1 Climate Change Mitigation, which emphasizes the importance of minimizing environmental impact and promoting sustainability in development projects. Camden must carefully evaluate demolition proposals in conservation areas to ensure that they meet these stringent criteria and contribute positively to the conservation and sustainability goals of the local area. Failure to do so would risk irreversible harm to the historic built environment and undermine efforts to mitigate climate change.

POLICY D2 HERITAGE: USE

- 30.2. Paragraph 7.53 deal with Use
- 30.2.1. *"Changes in patterns of use can also erode the character of an area. It is therefore important that, whenever possible, uses which contribute to the character of a conservation area are not displaced by redevelopment."*
- 30.2.2. Cumulative changes in patterns of use can indeed erode the character of an area over time. It is therefore crucial that, whenever feasible, uses that contribute to the character of a conservation area are not displaced by redevelopment. The shift from public services to financial gain can significantly detract from the character and ambiance of the area. Such changes may disrupt the delicate balance and historical fabric that define the unique identity of the conservation area. Therefore, it is imperative for planning authorities to carefully consider the impact of proposed developments on the character and vitality of the area, prioritizing the preservation of its heritage and distinctive qualities. Failure to do so risks irreversibly altering the character and charm that make the conservation area special and cherished by residents and visitors alike.



## PROPOSED USE

31. The proposed use of the site lacks clear definition and specificity<sup>8</sup>, posing significant concerns regarding stakeholders' ability to fully comprehend and assess the proposed development. While it is broadly categorized as a use for Life Sciences, the vague characterization offers little insight into the practical implementation and operational details of the proposed use. This ambiguity presents a serious risk, as stakeholders are left uninformed and unable to adequately understand the potential impacts and implications of the development.
32. Without a clear and detailed explanation of how the proposed use will be executed and utilized, stakeholders are left in the dark, unable to make informed judgments or provide meaningful input on the development. This lack of transparency undermines the principles of open and inclusive decision-making processes, denying stakeholders the opportunity to engage effectively and contribute valuable insights.
33. The absence of clear information impedes stakeholders' ability to conduct meaningful assessments and provide informed feedback on critical issues such as noise levels, chemical usage, and impacts on the conservation and heritage settings. These concerns are not merely hypothetical; they represent tangible risks that could have far-reaching consequences for the local environment, cultural heritage, and quality of life for residents.
34. Furthermore, the absence of clear definition raises questions about the legitimacy and feasibility of the proposed development. Without a comprehensive understanding of the intended use and its operational framework, it is difficult to assess the project's compatibility with existing regulations, infrastructure, and community needs.
35. In light of these concerns, it is imperative that the planning authority demands clarity and specificity regarding the proposed use of the site. Stakeholders deserve full transparency and detailed information to ensure meaningful engagement and informed decision-making. Without such clarity, the proposed development risks proceeding without adequate scrutiny and may result in adverse consequences for the community and the broader environment. Therefore, it is essential to address this deficiency and insist on a comprehensive and transparent explanation of the proposed use before any further consideration of the development.

## CAMDEN NEW LOCAL PLAN

### 36. POLICY CC2: Repurposing, Refurbishment and Re-use of Existing Buildings

37. The proposed demolition of Tavis House starkly contradicts the guiding principles set forth by the LB Camden Council's Policy CC2, which emphatically prioritizes the repurposing, refurbishment, and re-use of existing buildings over demolition. This policy mandates that all development applications involving existing structures undertake a rigorous condition and feasibility assessment early in the design process to evaluate the potential for re-use and determine the best use of the site.
38. It is concerning that the plans for Tavis House seem to bypass these critical initial steps, directly opposing the council's directives that clearly favor the exploration of all alternative development options. Such options include refit, reuse, refurbishment, substantial refurbishment, and extension of existing structures. According to Policy CC2, these alternatives should be thoroughly investigated and discussed with the Council at the earliest stages of planning, ensuring that any decision to proceed with demolition is based on comprehensive and transparent assessments.

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<sup>8</sup> 1. The Financial Viability letter by DS2 LLP (26 March 2024) submitted as part of the application makes note that the end use has not been confirmed and states: "such fit outs are highly bespoke and unique to specific end-users and as a result".

39. Furthermore, the policy outlines that only after demonstrating to the Council's satisfaction that all alternative options have been exhausted and that demolition indeed represents the best use of the site, can the demolition be considered. This demonstration must include a detailed pre-demolition audit that explores the reuse of materials on-site, identifies and documents all materials within the building, shows how building material waste will be minimized, and demonstrates adherence to circular economy principles.
40. The current approach to the development of Tavis House not only neglects these stipulated requirements but also poses a significant threat to the architectural and cultural fabric of the area. The lack of compliance with the Council's policies and the apparent disregard for sustainable development practices demand immediate reassessment. We urge the developers and the Council to enforce the stipulations of Policy CC2 rigorously, to ensure that any actions taken reflect a genuine commitment to the principles of sustainability and respect for our community's heritage and environment.

### **FINANCIAL VIABILITY LETTER**

41. It is evident from marketing materials provided by Gerald Eve LLP, the planning consultant for this application, that office space in the adjacent property of Lynton House is being actively marketed. This contradicts the accuracy and acceptability of the financial liability letter submitted as part of the application process. The letter, which purportedly outlines the financial viability of the proposed development, appears to substantially understate the projected income.
42. The discrepancy between the marketing material and the financial liability letter raises serious questions about the accuracy and reliability of the financial projections presented to support the development. If office space in Lynton House is indeed being marketed, it suggests a potential source of income that has not been adequately accounted for in the financial assessment provided. This discrepancy not only undermines the credibility of the financial viability letter but also calls into question the overall financial basis of the proposed development.
43. Given the importance of accurate financial assessments in evaluating the viability and feasibility of development projects, it is imperative that discrepancies such as these are addressed and resolved transparently and comprehensively. The planning authority must conduct a thorough review of the financial projections and require the applicant to provide updated and accurate information regarding the potential income generated by the adjacent office space. Failure to do so would compromise the integrity of the planning process and risk making decisions based on incomplete or misleading information. Therefore, it is essential that the planning authority takes prompt and decisive action to ensure that the financial viability of the proposed development is accurately and transparently assessed.

### **HISTORIC USE OF TAVIS HOUSE**

44. The historic use of Tavis House has been consistently for public sector bodies, serving the needs of government departments and charitable organizations. It is crucial to recognize that both Mary Ward House and Tavis House have shared a similar ethos of serving the public and local communities. Moreover, their close historical relationship is underscored by the fact that they were constructed on the same lands, owned by the Duke of Bedford, following the Blitz in 1940/41. The grounds on which Tavis House stands were once part of the same estate where Mary Ward House, formerly known as the Passmore Edwards Settlement, was built.
45. Had the applicant and developers consulted with us over their plans, we would have been able to offer highly synergistic proposals that would have benefited all stakeholders involved. It is evident

that the applicant and developers are primarily driven by commercial interests, as evidenced by their blatant disregard for properly engaging with the local community and stakeholders. However, it is essential to emphasize that the historic use and relationship between the properties are significant considerations that cannot be ignored.

46. Furthermore, alternative proposals that prioritize the preservation of the historic character and public service ethos of both Mary Ward House and Tavis House could potentially generate higher revenues for the applicant while substantially reducing development costs. While commercial decisions may not inherently be planning matters, the historical significance and community impact of the proposed development cannot be disregarded. Therefore, it is imperative that any planning decisions take into account the shared history, public service heritage, and community relationships of both Mary Ward House and Tavis House. Failure to do so would risk undermining the cultural and historical integrity of these invaluable assets and betraying the trust and expectations of the local community and stakeholders.

## CONSTRUCTION MANAGEMENT PLAN

47. The Construction Management Plan (CMP) dated 3 Dec 2021 fails to adequately reflect the proposed planning changes and change of use outlined in the revised planning application dated March 2024. The significant revisions, including the proposed substantial demolition of most of the interior and entire rear façade of the building, introduce new challenges and complexities that are not addressed in the current CMP.
48. It is evident that the CMP, as it stands, does not comprehensively deal with the problems and difficulties that will arise from the revised planning application. The proposed demolition alone presents a multitude of logistical and operational challenges that require careful consideration and mitigation measures, none of which are adequately addressed in the current CMP.
49. Furthermore, the failure of the CMP to align with the revised planning application demonstrates a lack of foresight and diligence on the part of the applicant and developers. It is essential that any construction management plan accurately reflects the proposed development and anticipates the specific challenges and impacts associated with it.
50. Given the substantial changes proposed in the revised planning application, it is imperative that a revised CMP be prepared to address the new scope of work, potential disruptions, and mitigation measures required. Failure to do so not only undermines the effectiveness of the construction management process but also poses risks to the safety, well-being, and interests of the local community and stakeholders. Therefore, it is imperative that the planning authority requires the applicant to revise and update the CMP to accurately reflect the proposed planning changes and address the challenges posed by the revised development proposal. Any further consideration of the planning application must be contingent upon the submission and approval of a comprehensive and updated CMP that adequately addresses the revised scope of work and associated impacts.
51. The proposed development site, Tavis House, located on a designated Strategic Route Network (SRN), raises significant concerns regarding the suitability of the planned loading and unloading area. This concern is heightened by the area's proximity to a bus stop and its position immediately before a left turn into Tavistock Place heading northeast. These factors pose specific risks and challenges that must be thoroughly addressed to ensure that the proposed changes do not detrimentally affect the safety, efficiency, and quality of life for local residents and road users.
52. Impact on Security (DRAFT Terrorism Bill) and Emergency Resilience
  - 52.1. The Construction Management Plan (CMP) dated 3 December 2021, fails to address critical safety, security, and resilience requirements as outlined in The London Plan Policy D11.

This policy mandates that development proposals maximize building resilience and minimize potential physical risks, including those arising from extreme weather, fire, flood, and related hazards. Furthermore, it requires the integration of measures to design out crime and deter terrorism, with these considerations factored in from the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

52.2. The CMP's oversight is particularly alarming given the imminent implementation of the Draft Terrorism (Protection of Premises) Bill, which will impose stringent requirements on premises to enhance protection against terrorist threats. The failure to incorporate robust safety and security measures in the CMP not only contravenes existing policies but also undermines the proactive stance required by the forthcoming legislation. This negligence could leave the development and its surrounding community vulnerable to security threats and unprepared for emergency situations.

52.3. Moreover, the CMP categorically impedes emergency resilience by designating the loading and unloading area for the development site on a Strategic Route Network. Strategic Route Networks are essential for maintaining uninterrupted access for emergency services. Any obstruction on these routes can significantly hinder the response times of emergency vehicles, potentially jeopardizing lives and property. The placement of loading and unloading zones on such critical routes demonstrates a profound lack of consideration for the operational requirements of emergency services and the safety of the local community. This ill-conceived plan must be revised to ensure that all construction activities do not compromise the functionality of these vital networks and adhere strictly to the principles of safety, security, and resilience as stipulated by The London Plan Policy D11 and the Draft Terrorism (Protection of Premises) Bill

### 53. Impact on Traffic Flow and Safety

53.1. The loading and unloading area's proximity to both a bus stop and a critical turning point into Tavistock Place creates a potential bottleneck, a scenario which is particularly concerning on a route classified as part of the Strategic Road Network (SRN). The SRN is intended to facilitate smooth and efficient traffic flow, which is critical to the functioning of the wider road network. Introducing frequent stops and starts associated with loading and unloading activities can lead to increased congestion. This congestion is likely to result in higher waiting times and delayed traffic flow, which extends beyond mere inconvenience and poses real risks:

### 54. Safety Risks at Bus Stops

54.1. The presence of a loading/unloading zone immediately after a bus stop may lead to conflicts between stationary buses and maneuvering delivery vehicles. This can endanger passengers alighting from buses, particularly the elderly, children, and those with mobility challenges.

### 55. Increased Accident Potential

55.1. The proposed location for the loading and unloading zone immediately before a left turn at Tavis House presents inherent traffic hazards. In areas where vehicles frequently adjust lanes and speeds to navigate turns, introducing additional stops and starts can significantly increase the likelihood of traffic incidents, such as rear-end collisions and sideswiping. The unpredictable nature of loading and unloading activities in this spot exacerbates these risks. Moreover, if these activities result in stationary vehicles obstructing views, drivers' ability to see other road users, including pedestrians at nearby crossings, can be severely compromised.

Additionally, this location's proximity to a pedestrian crossing raises further safety concerns. Stationary vehicles can block pedestrian paths, increasing the risk of accidents involving

pedestrians and forcing them to navigate around or between vehicles, potentially putting them in the path of moving traffic. Implementing measures to prevent or restrict parking and loading close to this junction is crucial. Such measures are vital for maintaining clear visibility for all road users and ensuring the safety of the area, aligning with best practices for traffic management and urban planning.

#### 56. Impedance to Emergency Vehicles

- 56.1. In situations of increased traffic congestion, the ability of emergency vehicles to navigate through Tavistock Square may be severely hindered, potentially delaying critical response times during emergencies.

#### 57. Effects on Local Road Network and Planning Developments

- 57.1. Beyond immediate traffic flow and safety concerns, the suitability of the loading/unloading area must be considered in the context of overall urban planning and development. Strategic Route Networks are designed not just for current needs but to accommodate future traffic growth and changes in urban dynamics. Placing a loading/unloading zone in a potentially problematic area could necessitate future roadwork or changes to traffic patterns, leading to further disruptions and financial costs. Additionally, it may limit options for improving or enhancing pedestrian and cycling routes in the area.

#### 58. Community Impact and the Need for Comprehensive Consultation

- 58.1. Given these potential impacts, it is crucial that the Camden Council engage in a robust, transparent, and non-biased consultation process with local residents, businesses, and other stakeholders. Effective consultation should include:
- 58.1.1. Detailed traffic and environmental impact assessments shared openly with the community.
  - 58.1.2. Opportunities for local residents to express concerns, provide feedback, and contribute to planning discussions, especially those most affected by the proposed changes.
  - 58.1.3. Consideration of alternative solutions that minimize disruption and maximize safety, such as relocating the loading/unloading zone or implementing strict operational time windows.

59. The strategic location of Tavis House on the SRN, coupled with its proximity to a bus stop and a critical road junction, makes the proposed site for loading and unloading highly unsuitable without significant mitigation measures. It is imperative that any planning decisions prioritize the safety, health, and wellbeing of all local residents and ensure that the integrity and functionality of the SRN are maintained. This can only be achieved through a concerted effort that involves all stakeholders in a meaningful and constructive dialogue.

#### **LACK OF ENGAGEMENT AND MISREPRESENTATION**

60. The lack of engagement and misrepresentation by the applicant is utterly reprehensible and warrants the strongest condemnation. Despite our proactive attempts to engage with the planning Application, including specific requests for information and agendas as set out in Appendix 1, the applicant chose to sidestep meaningful dialogue and instead resorted to contacting junior staff members via general telephone and email channels. This clandestine behavior is not only unprofessional but also deeply concerning, especially considering the Grade 1 listed nature of Mary Ward House.

61. The approach taken by the applicant in pushing through Planning Ref 2021\_6105 (during Covid Restrictions) and attempting to do the same with this planning application has left us feeling completely blindsided and disrespected. Their covert maneuvers highlight a clear disregard for transparency and meaningful engagement with stakeholders. By avoiding open dialogue and resorting to tactics, which may amount to willful deceit, they have not only compromised the integrity of the planning process but also neglected the concerns and interests of those impacted. Such blatant disregard for due process and accountability is unacceptable. Immediate rectification of this situation is demanded, along with a commitment to genuine and transparent engagement moving forward.
62. Furthermore, the attempt by the Applicant to portray their consultation efforts as comprehensive, inclusive and honest further raises the question as to whether they have intended to intentionally deceive. The assertion by the Applicant that there has been limited concern or interest from stakeholders is a blatant distortion of the truth and a shameful attempt to downplay legitimate concerns raised by the community.
63. The nature of the applicant's actions, seeking to misrepresent consultation efforts and disregard the importance of engaging with senior management and trustees, is reprehensible and indicative of their disregard for transparency and accountability. Such behavior undermines the integrity of the planning process and demonstrates a complete lack of respect for the heritage and stakeholders associated with Mary Ward House.
64. This blatant disregard for integrity not only undermines the credibility of their purported engagement efforts but also raises serious questions about their ethical standards and professional conduct.
65. Such behavior not only fails to serve the interests of stakeholders but also erodes trust in the planning process.
66. These deceitful tactics are not only morally reprehensible but also potentially criminal in their intent to manipulate and deceive LB Camden into agreeing to a development which would Damage a Conservation Area and Listed Building and cause a loss of jobs. Therefore, we implore the planning authority to refuse the application based on the lack of genuine engagement and trustworthiness of the consultation process.
67. We will be formally addressing our concerns regarding this lack of engagement with the council leadership, including Georgia Gould, Jenny Rowlands, and Dan Pope, to ensure that the seriousness of this issue is fully recognized and addressed. The public nature of these concerns necessitates immediate attention and action to safeguard the integrity of the planning process and protect the interests of the community and stakeholders involved.

## CONCLUSION

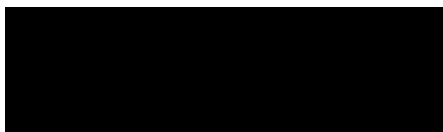
68. In light of the egregious lack of engagement and misrepresentation demonstrated by the applicant and the catalogue of Policy Contraventions, we implore LB Camden Council to reject the planning application in its current form. The flagrant disregard for transparency, accountability, and genuine consultation has undermined the integrity of the planning process and betrayed the trust of the community and stakeholders involved.
69. It is imperative that the council takes decisive action to address the concerns set out herein and uphold the principles of fairness, transparency, and community engagement in the planning process. Meaningful consultation with all affected parties must be prioritized to ensure that any proposed



developments are compatible with the needs and interests of the community and that the integrity of heritage assets such as Mary Ward House is preserved.

70. By rejecting the planning application and committing to genuine engagement with stakeholders, the council can demonstrate its commitment to upholding the public interest and safeguarding the cultural heritage and well-being of the community. It is essential that the council acts responsibly and decisively to rectify the shortcomings of the current planning process and ensure that future developments align with the aspirations and priorities of the community.
71. The listed nature of Mary Wary House and the value it brings to society lies in its active use, not merely in its preservation. If the asset cannot serve as a lively component of the community, its cultural importance declines as it becomes less intertwined with the everyday life of the community.
72. Thank you for considering my objections.

Yours faithfully,



Crochan Murphy

Mary Ward House  
5-7 Tavistock Place  
London  
WC1H 9SN



email: 

website: [www.marywardhouse.com](http://www.marywardhouse.com)

## Appendix 1

Fw: Change of Use Planning: Mary Ward House Ltd

[REDACTED] marywardhouse.com >

Wed 06/03/2024 14:53

📎 1 attachments (99 KB)

KandAConsulting Redacted.pdf;

Dear Mr Greenshields,

We are somewhat surprised at your recent channel of contact which supports our concerns that Kanda Consulting and the owners of Tavis House and their officers are acting in an underhand manner to push through planning.

We wrote to you on the 26 February 2024 and have included it below for reference. It seems that you have blatantly ignored that email and sought to contact junior members of staff in an effort to absolve yourselves of any planning, legal and commercial responsibilities.

Please irrevocably cease and desist from seeking to make contact with members of Mary Ward House, save for this email address, until further notice.

You make a number of false and misleading claims, as was the approach taken in the 2021/6105/P planning application.

The planning and change of use are in fact highly contentious and extremely detrimental both to a Grade 1 heritage asset, residents and the stakeholders associated with Mary Ward House.

We intend on using all means necessary to prevent the owners of Tavis House from riding roughshod over Mary Ward House.

Please ensure that all future correspondence should be directed toward this email address until further notice.

[REDACTED]

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**From:** [REDACTED]

**Sent:** 26 February 2024 16:31

**Subject:** Change of Use Planning: Mary Ward House Ltd

Dear Mr Greenshields,

Further to your recent email, please can you provide further detail on the change of use planning application to which your contact concerns.

In particular, please provide the site location, the proposed change of use and an agenda of the matters you would like to discuss.

We look forward to hearing from you.





Mary Ward House Conference and Exhibition Centre  
5-7 Tavistock Place  
London WC1H 9SN

Tel: 

Email: 

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## Appendix 2: Proposed Demolition

