Application No:	Consultees Name:	Received:	Comment:	Response:
2020/0573/P	Douglas Tuck	30/03/2020 16:40:35	OBJ	Sir,

Ref. : 2020/0573/P ; Queen Court Queen Square London WC1N 3BA ; Removal and replacement of windows at ground to seventh floor levels on front, side and rear elevations

Re. : The Application
“The application site has been the subject of a number of historical planning applications, none of which however, are relevant in the consideration of these proposals.” [ref. 1. Covering Letter Queen Court]

– A substantially similar proposal was lodged approximately one year ago and subsequently withdrawn. [Ref. 2019/0816/P]

In summary, what this fresh application appears to suggest is:

– That the entirety of the original fenestration is in such a woeful state of disrepair that no economically viable alternatives remain available.

– That the proposed replacement windows will have a visually negligible impact, and may even enhance the property.

– That thermal and comfort levels will be enhanced, presumably, thereby enhancing the buildings “green” credentials.

This application proposes to replace some 207 original steel windows with those of a superficially similar style. As many of these “window” elements are composed of multiple casements the actual total number comprises some 491 separate casements. Of these “windows” 46 are of a leaded “Tudor” style, and are divided between Queen Square and Guilford Street – the two principal elevations – so totaling some 314 “Tudor” style leaded window casements. The remaining windows, to the sides, are of a plainer “Georgian” pattern with steel frames and timber sills fronting Queen Annes Walk, to the enclosed internal back courtyard (open to Guilford Street), and also contained within a fully-enclosed internal light-well.

The sum conclusion of the above points, together with supporting documents, suggest that, after laborious, exhaustive, and painstaking research, that no other course of action makes any sense, and that the entire replacement of all windows remains the only sensible and reasonable option available.

I would argue that this position is wrong and entirely misleading:

– It is simply a matter of fact that there exist a minority of original windows in poor repair. Primarily these are those with wooden sills located to the more exposed areas. Of those, it is the wooden sills, and not their steel frames, which require the most immediate attention.

– The unaffected existing leaded “Tudor” style windows to the principal façades play an absolutely fundamental role in the appearance of Queen Court, and that their proposed and unnecessary unilateral

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replacement with modern double-glazed units, incorporating some kind of fake interstitial “lead” grid, would be a poor substitute for the original casements.

– The proposal and methodology is fundamentally at odds with Camden Conservation Area policy and English Heritage guidance:

From Bloomsbury Conservation Area Appraisal and Management Strategy, 2011:

– "On the north side of the square, the buildings date from the first half of the 20th century, having been constructed on the 18th century garden which spanned its entire north end. The Royal Institute of Public Health at No 23 is a striking and elegant Art Deco inspired classical design dating from c1925. Its imposing façade is visible in long views across the square gardens, and comprises four principal storeys in a symmetrical red brick and stone composition. Adjacent is Queen’s Court at No 24, a finely-detailed interwar neo- Tudor residential building originally built as a nurses’ home, which also forms an important end stop to the vista along the square."

– "in undertaking its development control function the Council will ensure that the historic details which are an essential part of the special architectural character of Bloomsbury Conservation Area are preserved, repaired and reinstated where appropriate;"

From Historic England: Traditional Windows, Their Care, Repair and Upgrading, 2017:

– "The loss of traditional windows from our older buildings poses one of the major threats to our heritage. Traditional windows and their glazing make an important contribution to the significance of historic areas. They are an integral part of the design of older buildings and can be important artefacts in their own right, often made with great skill and ingenuity with materials of a higher quality than are generally available today. The distinctive appearance of historic hand-made glass is not easily imitated in modern glazing."

– "Windows are particularly vulnerable elements of a building as they are relatively easily replaced or altered. Such work often has a profound affect not only on the building itself but on the appearance of street and local area."

– "With an increasing emphasis being placed on making existing buildings more energy efficient, replacement windows have become a greater threat than ever before to the character of historic buildings and areas."

– "The loss of traditional windows from our older buildings poses one of the major threats to our heritage."

– "Traditional windows can often be simply and economically repaired, usually at a cost significantly less than replacement."

– "The whole-life environmental costs of replacement will be much greater than simply refurbishing. It will take many years before savings on heating offset the large amounts of energy used to make PVC-u windows in the first place. Repairing traditional windows rather than replacing them is not only more sustainable but makes

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better economic sense, particularly when the use of shutters or secondary glazing to improve their thermal performance is taken into account."

– "Crucially, retaining historic windows of significance is an important part of good conservation.

– Windows are generally presumed to account for 10-20% of the heat loss from buildings, although this will vary greatly from one building to another, depending on the size and number of openings in relation to the external wall area.

– Traditional metal windows can often be economically repaired and made energy-efficient (see Section 5, Thermal upgrading) rather than be totally replaced.

– Recent research has shown heat losses by conduction and radiation through a window as a whole can be reduced by over 60% by using secondary glazing with a low emissivity (low-E) hard coating facing the outside.

Summary
Any degradation of Queen Court will in turn degrade its adjacent fine buildings as well as the historic context of the Queen Square itself. There appears to be a questionable and wilful desire by the applicant to entirely replace all the windows to this building by using the excuse that some are in need of minor maintenance and repair. In fact, the vast majority of the windows are sound and of a perfectly serviceable condition. Many windows are already fitted with secondary glazing. Some sills are showing neglect since their last maintenance 10 years ago. The managing applicant in their covering letter states “our contention that planning permission is not required...” [ref. 2. Camden planning (MAC-QC-PHKD-001)], indicating a contempt for both planning policy, due process and Camden's stated conservation principles and good practice.

In Conclusion
I would strongly urge those, before making a decision, to first visit Queen Court and Queen Square, and ascertain the situation for themselves. This endeavour seems a completely superfluous and cosmetic exercise of an entirely dubious merit that risks the irrevocable degradation of a fine building.

Sincerely,

Douglas Tuck
Dip. Arch (Hons) Edin.