



**BLOOMSBURY  
CONSERVATION AREAS**  
Advisory Committee | Est. 1968

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**2020/5940/P & 2020/5943/P**

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**Letter of Support: Change of use and restoration of 7 and 8 Great James Street.**

The Bloomsbury CAAC wishes to support the application for change of use and associated alterations at 7 and 8 Great James Street in the Bloomsbury CA.

*Architectural and historic interest of the site*

Both terraces are of early Georgian construction and represent some of the most historic residential development in Bloomsbury and Camden. The status of these buildings is reflected in their Grade II\* listing.

Great James Street falls within 'Subarea 10 (Great James Street / Bedford Row)' of the Bloomsbury CA, which is described from paragraphs 5.174 through 5.191 of the conservation area appraisal. While these paragraphs do not go into great detail about the interest of this area, the CAAC agrees that it is the remarkably well-preserved early Georgian terraces which strongly defines these streets. There are relatively few areas in Central London and none at all within Bloomsbury which are preserved to this standard. Accordingly, this area retains Bloomsbury's originally intended architectural and historic character to its greatest degree.

The original development of these streets sought to provide single use residential homes for the middle classes of the time. While the use of the houses on these streets has changed significantly over the three hundred years of their existence, the area has successfully retained at least the appearance of residential use. The predominant office use is restricted mainly to the legal profession, given the proximity to Gray's Inn and Lincoln's Inn.

*Heritage benefit of office or residential use*

The CAAC agrees with LB Camden that the particular use of legal offices forms part of the special character of this area, and substantial loss of this use would amount to some level of harm to the special character of the CA. However the use of these buildings as single occupancy residential also

brings significant heritage benefit both to the individual buildings and the wider conservation area. The use of Georgian terraces as single occupancy residential is surprisingly rare across the CA: more commonly residential use is split between flats on different floors. Accordingly weight should be given towards the conversion of Georgian terraces into single unit residential where appropriate.

It is the CAAC's view that the only two uses congruent with heritage considerations are that of single occupancy residential, and as offices for the legal profession. While the CAAC believes that single occupancy residential is broadly to be preferred in individual cases (both for listed buildings individually and the CA as a whole), it acknowledges the arguments in favour of office use for the legal profession in this particular area.

#### *Lack of demand for office space in Georgian terraces*

It is understood that the applicant has demonstrated a lack of demand for office use in Georgian terraces predating the COVID pandemic. Given the COVID pandemic it is safe to assume that the demand will decline further, at least in the short and medium term.

It is also clear from recent major developments approved and proposed within the CA and nearby (Selkirk House, Belgrove House, 330 Gray's Inn Road, King's Cross Central) that there is a significant demand for office space within newly constructed buildings. The provision of new build modern office space is only likely to increase in the coming decades.

#### *Class E vs residential*

It is not the commercial use as a whole which forms part of the special interest of this area, but the specific use of offices for the legal profession. With the newly adopted Class E it is understood that it is not legally possible to safeguard the use of 7 & 8 Great James Street as offices for the legal profession, nor as offices generally at all. If there is no demand for use of these buildings as legal offices then it is likely that proposals will come forward for an entirely different kind of use, which may cause harm to the special character of the buildings themselves and the wider CA. The Bloomsbury CAAC would resist any commercial use distinct from legal offices.

The retention of these units as commercial therefore introduces some level of uncertainty into the safeguarding of the terraces themselves and the CA as a whole. There is however demand for use as single-occupancy residential, and the type of client attracted to these properties is one that will likely invest in the building itself, while also having the means to ensure the general safeguarding and protection of the building for the foreseeable future.

Use of the building as single occupancy residential can also be easily safeguarded, in that it would require permission to change to any other kind of use, unlike Class E. This places a strong presumption in favour of continued single occupancy residential, one of the two preferred uses for these buildings.

#### *Heritage benefit of restoration and single-occupancy residential*

The Bloomsbury CAAC attaches significant weight to the restoration of these terraces as proposed by the applicant. A site visit on 28<sup>th</sup> May 2021 revealed the interiors to be in a poor state of preservation and general upkeep, and a number of inappropriate internal changes had been made in keeping with office use. The application seeks to restore the interior as far as possible, restore

the external windows to their original appearance, and cause minimal damage to the fabric of the building through the routing of services. The applicant also has a record of restoring similar buildings nearby and more widely, which we were able to witness first hand on a construction site.

It is not common for applications to come forward which propose such a significant level of heritage benefit in this area, either to the CA or individual heritage assets. Given the exceptional significance of these buildings at Grade II\*, such benefit should be afforded very significant weight indeed.

#### *Precedents set, and taking the application on its merits*

It is understood that there is some reservation about setting a precedent in this area for conversion of commercial to residential. It is agreed by the CAAC that approval of these applications does set a further precedent for this kind of conversion.

However in paragraph 5.178 of the Bloomsbury CA appraisal (2011) it is admitted that some level of precedent has already been set.

The CAAC however does not believe that setting a precedent for approval of this kind of application would be harmful, either to the buildings themselves or wider CA. If potential developers recognise that significant restoration work is required for a change of use to be approved, it places a substantial presumption in favour of thorough restoration. It is more common for market forces to align with heritage harm; it would be highly beneficial if market forces can be made to align with heritage benefit in this area, especially given its exceptional historic importance.

On the other hand, refusal of these applications demonstrates that the heritage benefit of restoration is not afforded great weight, and dissuades future applicants from restoring historic buildings when pursuing similar changes. This is itself a precedent which can only be harmful for the long term safeguarding of this area, and should be resisted.

#### *Conclusion*

While Camden officers have rightly given great thought to the safeguarding of the legal offices in this area, we must respectfully disagree that the safeguarding of Class E use generally outweighs the very significant heritage benefit brought by these applications. The use of legal offices itself cannot be safeguarded, while the architectural and historic significance of these buildings can be safeguarded by approval of these applications.

It is also right that consideration should be given to the setting of a negative precedent in this area and more widely. However the approval of these particular applications, especially after so much deliberation, would only demonstrate that significant heritage benefit is required in order to outweigh the presumption in favour of commercial use retention. In our view this would set a very beneficial long term precedent for the careful restoration of historic buildings, supported by market forces, and their reversion to their originally intended use. Such a significant heritage benefit, in our view, very substantially outweighs any marginal harm caused by the loss of Class E space in this area.

We therefore request that these applications are approved.

**Bloomsbury Conservation Areas**  
*Advisory Committee*

12<sup>th</sup> June 2021