

From: Bloomsbury Conservation
[REDACTED]
Sent: 21 November 2021 20:13
To: Nathaniel Young
Cc: Rose Todd; Planning Planning
Subject: OBJECTION: 2021/3415/P
Attachments: [2021-3415-P 30-32 Tavistock Place.pdf](#)

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Nathaniel,

Please find attached our objection to the above.

Owen Ward



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



On 15 Oct 2021, at 09:11, Nathaniel Young
[REDACTED] wrote:

Dear Owen,

That's no problem, thank you for the update.

Kind regards,

Nathaniel Young
Senior Planning Officer



The majority of Council staff are continuing to work at home through

remote, secure access to our systems. Where possible please communicate with us by telephone or email.

From: Bloomsbury Conservation [REDACTED]
Sent: 14 October 2021 20:42
To: Nathaniel Young [REDACTED]; Planning Planning [REDACTED]
Subject: 2021/3415/P

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Dear Nathaniel,

Just to let you know, I have accidentally overshot the deadline for comments on this application by some way as I must have missed this at our last meeting. I will prepare some comments over the next few days if that is acceptable. I assume by the size of the application there is a while yet until you will be able to look at it anyway.

Owen

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<image002.jpg>



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21st November 2021

2021/3415/P
2021/4404/L

Nathaniel Young
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Formal objection to 2021/3415/P and 2021/4404/L regarding substantial alterations to 30-32 Tavistock Place and extension to an outbuilding at rear.

Having considered the above application we would like to formally object to the alterations proposed at 30-32 Tavistock Place. This is an in-principle objection and will not be rescinded following any minor revisions.

Significance

The two properties are Grade II listed and situated in Subarea 13 of the Bloomsbury Conservation Area. They form part of the original 1968 designation of the Bloomsbury CA in recognition of the original Georgian development which largely defines the character and appearance of this CA.

The two properties are typical Georgian townhouses in a preserved terrace formed of 18-44 (even) Tavistock Place. The terrace elevation is defined by its uniformity and unusually restrained appearance with no decorative features such as cornices or rustication. This character is shared with nearby Marchmont Street although not replicated elsewhere in the CA, despite having been fairly common before substantial redevelopment from the Victorian period onwards.

Beyond the townscape and exterior architectural significance of the two buildings, the original historic fabric, where it survives, is clearly also of historic significance.

Preservation

It is our view that 18-44 (even) Tavistock Place are in an exceptionally poor state of preservation, both externally and internally, given the general state of preservation of Georgian terraces throughout the conservation area. It is our view that the use of these terraces as hostels and B&Bs is a contributing factor to this general state of decay. This economic use has led to a lack of investment in the upkeep of these terraces and pressure for a host of insensitive and inappropriate changes, such as inappropriate paint schemes (No. 34) and inappropriate signage (No. 44, 42, 40, 38, 34, 24, etc). A number of highly inappropriate alterations have also been made to entrances. Despite being Grade II listed a lack of enforcement action has also contributed towards the poor state of these terraces and ongoing deterioration. It is also likely that the lack of surviving internal features has been due to illegal alterations without appropriate enforcement action.

In long term town planning terms, the continued use of these terraces as low-quality hostels and B&Bs should be resisted in favour of uses more beneficial to the significance of these buildings and wider conservation area, and the economic vitality of the Central Activities Zone.

Proposals

Turning to the application itself, we do not consider that it proposes any heritage benefits for the listed building or conservation area that are of note. Some very minor beneficial alterations are proposed, such as the replacement of signage and the replacement of basement French doors with a sash window. However, given the scale of the changes proposed, these alterations are minimal in comparison and the existing signage on the front elevation has in any event not been consented.

A site visit was not conducted but photographs supplied as part of the heritage statement show the generally dilapidated state of the interior. Some historic features survive although most of interest has been lost at first floor and above.

The internal alterations do not aim to restore or conserve any elements of historic and architectural interest but focus instead on intensifying the use of the building as a hostel to the greatest possible degree. This can be seen most clearly on the *Existing and Proposed Second Floor Plans (2105 LB 303)* where all six rooms are proposed to have *en suite* bathrooms installed within the existing room layout. All of these overlap the chimney breast obscuring the significance of this internal feature and the plan layout of these rooms.

The submitted *En Suite Moodboard* also shows internal features and fittings of exceedingly low quality given the architectural significance of the listed building. The installation of these suites would also require a level of damp-proofing and installation of services through the walls and floors of the building. Given that these features are some of the only remaining historic elements of this building internally, appropriate weight should be given to their conservation. It should also be noted that the significant increase in humidity when all showers are in frequent use coupled with the increased probability of leaks puts this building at increased risk of both minor and serious long-term damage through mould, damp, dry rot, and beetle attack.

It is for these reasons that the internal alterations proposed are considered to cause harm to the plan form and historic and architectural significance of the listed building.

The existing annexe building at the rear is of very low design quality and of no historic interest. The submitted heritage report explains that the buildings are likely constructed post 1970, which is surprising considering the 1974 listing. The submitted photographs show the building to have been constructed to a very poor standard. Despite much of the building appearing to be fairly recent in construction, there appears to be no record of it ever being consented.

It is our view that the upwards extension of the outbuilding is inappropriate in principle. Given the historic context of this site and its small scale any outbuilding should be of a small domestic size and of a use strictly subsidiary to the main building. In extending upwards the building takes on a new character as separate 'mews' type accommodation which we find to be inappropriate within the small curtilage of this listed building. It should also be considered that if this were to be consented, it would be very difficult to prevent many similar applications being made for the conversion of single storey outbuildings into two storey outbuildings throughout this area and wider Camden within the setting of listed buildings.

In total, the proposals are considered to bring minimal heritage benefits, and propose a number of alterations which are inappropriate given the significance of these heritage assets. The changes also act to consolidate a long-term use which has been and continues to be severely detrimental to the preservation of these buildings. While maintenance works are proposed, such as repainting, cleaning,

and general repair of building fabric, these are not considered material to the application as they can be carried out without permission and indeed should have been carried out long in advance of this application.

Paragraph 6.6 of the submitted heritage statement sets out as justification for the harmful alterations the fact that the alterations bring public benefit, specifically in putting the heritage asset to its optimum viable use.

Paragraph 15 of the Historic Environment PPG deals with the *optimum viable use* of a heritage asset. Georgian townhouses in the Central Activities Zone clearly have a wide variety of economically viable uses, most of which are at least somewhat aligned with their conservation. The PPG states in this case that the optimum viable use of a heritage asset is the one '*likely to cause the least harm to the significance of the asset*'.

Given the clear evidence of permanent harm that has been done to these buildings throughout their use as a hostel, and the reasons set out in the beginning of this response, it is not considered that the hostel use is the optimum viable use of these buildings. Use as a single occupancy dwellinghouse (C3) is likely to be the optimum viable use in this case.

As set out in the so-called *Mount Cook* principles, it is appropriate in determining an application which would typically be refused to consider possible alternative uses for a site that might come forward if an application is refused. As evidenced by many applications currently being determined in this conservation area, there is an economic drive to restore and convert Georgian terraces of this kind to single occupancy residential. Given that this use is likely the optimum viable use of the site, we would advise the Council to take this into account.

Nevertheless, there are some minimal public benefits that are proposed as part of this application relating to the conservation of some historic elements such as windows and removal of unnecessary service pipes, but these are not considered to outweigh the harm caused to the significance of the heritage asset and wider conservation area.

The Bloomsbury CAAC therefore objects to this application.