				Printed on: 20/05/2022			
Application No:	Consultees Name:	Received:	Comment:	Response:			
2022/1817/P	Debbie Radcliffe	19/05/2022 15:33:15	OBJ	I object to the proposal to demolish 25% of 105-112 Judd Street in order to significantly increase the building's height and massing, which will cause harm to the Bloomsbury Conservation Area, within which the Application site is located.			
				As a longterm permanent resident of Judd Street, I am fully aware than places cannot remain in aspic, but physical change to a building must surely be sympathetic to, and in-keeping with, the surrounding historic urban environment.			
				Historic context: Camden Town Hall			
				A few yards north of the former RNIB building stands the impressive Grade II listed Camden Town Hall, soon to fully emerge from over two years of scaffolding. There was an initial proposal to increase its height to provide additional floorspace, but in the end sense prevailed and these plans were abandoned. As a result, the building (including the roof) will have been repaired and refurbished to provide modern amenities and new office space (even lab / science space as well), but it will look much the same as when it was constructed in 1934.			
				The former RNIB building was already in situe when the Town Hall was built, and the more important status of the latter is reflected in its dominant size, style of architecture and location at the north end of Judd Street.			
				Having spent £73 million on refurbishing the Town Hall, surely Camden Council will not want to see it upstaged by a building a few yards away, which will likely draw unwelcome attention with its out of scale, top heavy roofscape and unsubtle dormers.			
				Historic context: surrounding residential architecture - Edwardian mansion blocks			
				All the Edwardian mansion blocks surrounding the Application site have a similar scale and share a common vocabulary of red brick. This creates a sense of harmony which will be destroyed by the proposed increase of height and massing at 105-112 Judd Street.			
				In the Bloomsbury Conservation Area Appraisal, the Application site is described as "a red brick Edwardian building featuring sandstone decoration and a turret at the junction with Hastings Street." Views of this turret will be diminished by the proposed roof extensions on 3rd, 4th and 5th floor level. At the moment it is seen against a background of the sky, a key landmark feature on the north east of the corner of the building.			
				Many tourists arrive at St Pancras from overseas and walk down Judd Street, enjoying the "feel" and historic character of a neighbourhood which has generally avoided inappropriate infill development.			
				Historic context: surrounding residential architecture - Georgian terraces			

area."

Camden's Planning Guidance acknowledges the Borough has "a rich architectural heritage" with "a responsibility to preserve, and where possible, enhance these areas and buildings...We will only permit development within conservation areas that preserves and enhances the character and appearance of the

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Surrounding the Application site, to the south and west, are remnants of an earlier era, the Grade II listed Georgian terraces, built by the eminent architect and developer James Burton. These are a key feature of the Bloomsbury Conservation Area, and have a consistent scale and character.

Two of these terraced properties share a party wall with 105 Judd Street. The additional height and massing of the proposed roof extensions next door will not "enhance and protect" this particular example of Camden's historic built environment.

Demolition in a Conservation Area - can this be justified?

Camden's planning guidance states: ".....We would not normally allow demolition without substantial justification, in accordance with criteria set out in government guidance PPS5 – Planning for the Historic Environment."

As a heritage asset (positive contributor to the Conservation Area, if not actually listed) the Application building is obviously not considered "redundant" and 75% of the building is being retained.

But 25% is being demolished, which is a quarter of the building.

The reason for demolition is to add two extra floors, described as "internal areas providing room for the new core and spine walls to facilitate the aspiration for open floor plates." (Apparently necessary for Lab-enabled schemes). The result is a totally altered roofline with "decorative dormers" that demonstrate a complete lack of subtlety and will jar horribly with the character of the surrounding architecture.

In fact there are three additional floors, as the third has plant on the very top of the building. This plant is being screened, and thus adds to the increased height of the urban block.

How NECESSARY is this demolition?

Policy documents state that demolition can cause harm to the historic asset's significance and is only justified by a proposal that offers substantial public benefits.

In the case of 105-112 Judd Street, there are no public benefits.

- a) There is no affordable housing to be provided to justify (perhaps) the additional height.
- b) A cafe is proposed on the ground floor which is unnecessary and will in effect compete with existing similar businesses in the surrounding area (Half Cup Cafe is opposite 105; others are located at 63 Judd Street, the corner of Hastings & Sandwich, Leigh Street and Cromer Street).
- c) External terraces are proposed "as amenity spaces promoting well being in the commercial environment" but these are not for public use (and will be extremely detrimental to residential amenity / privacy of nearby neighbours)
- d) It is already the Council's ambition to add increase greening in Camden, add a large number of street trees and improve the public realm. What are the developers offering in addition to Camden's greening programme?

Conclusion

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				105-112 was constructed as a purpose built office block, occupied by the Salvation Army HQ since 1911. It		

became the HQ for RNIB in 2004. Kelvin House (former Telephone Exchange) was built between the Wars and, like 105, has a commercial use. But the principal character of Judd Street and the surrounding streets is residential, even if outsiders' perception differs. The desire to add considerable height and mass in order to create a Lab-enabled scheme for (as yet unknown) Knowledge Quarter tenants does not seem to be appropriate or relate to the historic character of the immediate locale.

There is an opportunity to refurbish the building imaginatively and yet sympathetically, providing modern office space (or even mixed use with residential) without changing the historic roofline or causing harm to the Conservation Area. A precedent for this approach for quality restoration + office use has been set by Camden Town Hall, only a few yards away. This is surely the appropriate way forward to ensure a viable future for this well-loved Edwardian building at 105-112 Judd Street.