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28 May 2022

2022/1817/P

London Borough of Camden 5 Pancras Square London N1C 4AG

## Formal objection to 2022/1817/P at 105 - 121 Judd Street WC1H 9NE

We would like to object to the above application on the grounds of causing unacceptable harm to the significance of the surrounding listed buildings the Bloomsbury conservation area as whole.

## Site and Local Context

105-121 Judd Street are the offices of the Royal National Institute of Blind People (RNIB), a red brick Edwardian building at the junction with Hastings Street. It occupies a prominent corner position in sub area three of the Bloomsbury CA and is listed in the CA appraisal as a positive contributor. The site is adjacent to two listed Georgian terraces along Thanet and Judd Street, as well as nearby Victorian / Edwardian 'Mansion block' style buildings.

## Impact of Uplift in Scale

We are particularly concerned with the visual impact of the three-storey roof extension on the surrounding listed terraces on Thanet and Judd Street, and the views along Judd Street. The multiple additional storeys would only exacerbate the buildings existing overbearing presence on the two storey terraces on Thanet Street and to a less extent the four storey terraces on Judd Street. To prevent damaging the setting of these listed buildings only a one storey set back extension might be acceptable. We also object to the proposed south facing terraces on the third and fourth floors which overlook the private gardens of the listed terraces on Thanet and Judd Streets. These would lead to an unacceptable loss of amenity to these listed buildings and should be refused.

## Design

A particularly objectionable aspect is the proposed fifth floor extension and plant enclosure. The increased massing of the roof makes the building look 'top heavy' detracting from the existing decorative dormers and turret. The mansard roof overwhelms the host building and makes no positive contribution. We believe that the proposed projecting dormer detail to the northeast and northwest elevations do not successfully reference the character of the existing dormers.

## **Relevant Planning Policy**

Policy D2 Heritage of the Camden Local Plan 2017 states: 'The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.' We believe that the proposal does not have tangible public benefit that outweighs the damage of amenity to surrounding listed buildings and the wider Bloomsbury CA.

We believe that the proposal should be considered inconsistent with the statutory duty to preserve and enhance the special interest of the Bloomsbury CA, and the duty under the NPPF paragraph 201 it is to balance less than substantial harm against public benefit. This application should, therefore, be refused.

# **Bloomsbury Conservation Areas**

Advisory Committee