

architecture : planning

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**Full-Planning and Listed Building Consent for the
change of use of the property from HMO (Sui Generis)
to self-contained residential flats (Class C3) including
internal alterations**

29 Conway Street London W1T 6BW



1. Introduction

- 1.1 UPP Architects + Town Planners have been instructed by the applicant to apply for full planning permission and listed building consent at 29 Conway Street, London, W1T 6BW. The application seeks planning permission and listed building consent for internal alterations to facilitate a change of use from HMO (Sui Generis) to 4no. self-contained residential flats (Class C3).
- 1.2 This document provides details of the proposed scheme and will demonstrate that proposal is in accordance with planning policy and guidance at national, regional and local levels.

2. The Site and Surroundings

- 2.1 The existing site, comprises a 4-storey terraced property with a basement level. The property is well-maintained externally but has been altered internally over time and was most recently used as living accommodation for teachers at The Kabbalah Centre. The number of people living in the property has been sporadic at times but has been used as a large-scale HMO for the last 10 years.
- 2.2 The applicant is Grade II listed and the listing spans the entire set of terraced properties known as No.23-33 Conway Street. The site is also located within the Fitzroy Square Conservation Area. There are no other planning designations impacting the property.
- 2.3 The surrounding area is mixed in character with residential, office, retail, medical and education uses found within the wider area.
- 2.4 The site is located in a highly accessible area and has a PTAL rating of 6b which is considered 'excellent' access to public transport. The site is located under a 5-minute walking distance from Great Portland Street and Warren Street underground stations. Furthermore, there are several bus stops located within the a close by radius to the application site located on Tottenham Court Road, Great Portland Street and Euston Road



3. Planning Designations

- The site is located within the London Borough of Camden.
- The site and attached railings form part of a grouped Grade II listing concerning No.23-33 Conway Street.
- The site is located within the Fitzroy Square Conservation Area.
- The site is located within Flood Zone 1 which is considered to have a low risk of flooding from rivers and seas.

4. Relevant Planning History

4.1 The relevant planning history for the site is as follows:

- 2020/3148/P - Internal alterations associated with the change use of the existing 18 Bed HMO units (sui-generis) into 13 Bedroom HMO units between the basement and third floors. Withdrawn.
- 2020/3569/L - Internal alterations including new partition and door arrangement between the basement and third floors associated with the change of use of the existing 18Bed HMO (sui-generis) into 13Bed HMO (sui-generis) units. Withdrawn.
- 2020/4683/INVALID - Erection of a mansard roof extension associate with the use of the loft space for additional floorspace for the existing HMO unit. Withdrawn.
- 2020/5167/INVALID - Erection of a mansard roof extension associate with the use of the loft space as self-contained flat consisting of 1 x 2Bed unit. Withdrawn.

5. Pre-Application Summary

5.1 On 5th May 2022, a pre-application advice request was registered requesting pre-application advice for the change of use of the property from a Sui Generis (HMO) to Class C3 operating either as a single-family dwelling or multiple self-contained flats. On 26th August 2022, written advice was provided concerning the pre-application proposals.

5.2 The report suggested the principle of development was potentially acceptable but the Local Planning Authority requested additional information regarding the original, historic and current



uses before making any conclusions on the proposal. The LPA's preference was to create an equivalent amount of floor space for permanent self-contained housing (in Use Class C3). The concluding paragraph stated as

"Whilst it is generally considered that the best use for a listed building would be to return the property back into its original use as a single dwelling this needs to be balanced against the policy protection afforded to HMOs and maximizing the site's potential for a greater number of housing units that meet priority types and sizes. Therefore, the proposed conversion from an HMO back into its use as self-contained residential accommodation might be considered acceptable if this was demonstrated to be the only practical option for the longer-term heritage benefits of realizing optimum viable use of the listed building."

- 5.3 Therefore, this submission seeks to provide the further information and justification to bring forth a proposal which is fully compliant with national, regional and local planning policy.

6. Planning Policy

- 6.1 The Local Development Framework is as follows:

- The National Planning Policy Framework (NPPF)
- London Plan (2021)
- Camden Local Plan (2017)

National Planning Policy Framework (NPPF)

- 6.2 The National Planning Policy Framework (NPPF) holds an emphasis on creating sustainable development. There are three aspects which comprise sustainable development; these are the economic role, the social role and the environmental role. In terms of the economic aspect land has to be made available where there is a demand to support growth; the environmental role involves the protection of the natural, built and historic environment; and the social role is to support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations.



- 6.3 Applications should be considered in the context of the presumption in favour of sustainable development. Local authorities should deliver a wide choice of high-quality homes. The mix of housing should take account of future demographics and market trends, differing needs and local differences. It is inevitable that for compliance with the NPPF and in the spirit of progress higher densities are often required, especially where sites fall within sustainable and urban locations.
- 6.4 Paragraph 202 of the NPPF states that “where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

The London Plan (2021)

- 6.5 The new London Plan has been formally adopted by the Mayor of London. The relevant planning policies are:
- 6.6 Policy GG2 – Making the Best Use of Land – *“To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:*
- A. enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites*
 - B. prioritise sites which are well-connected by existing or planned public transport*
 - C. proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling*
 - D. applying a design-led approach to determine the optimum development capacity of sites*
 - E. understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London’s distinct and varied character*
 - F. protect and enhance London’s open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible*

- G. *plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient.*

6.7 Policy D6 – Housing Quality and Standards – *“Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.”*

6.8 Policy H1 – Increasing Housing Supply – *“Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.”*

6.9 Policy H10 – Housing Size Mix – *“Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:*

- 1) *robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment*
- 2) *the requirement to deliver mixed and inclusive neighbourhoods*
- 3) *the need to deliver a range of unit types at different price points across London*
- 4) *the mix of uses in the scheme*
- 5) *the range of tenures in the scheme*
- 6) *the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity*
- 7) *the aim to optimise housing potential on sites*
- 8) *the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock*
- 9) *the need for additional family housing and the role of one and two bed units in freeing up existing family housing.”*

- 6.10 Policy T5 – Cycling – *“securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.2, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.”*

Camden Local Plan (2017)

- 6.11 Policy H1 Maximising Housing Supply – *“The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.”*
- 6.12 Policy H3 Protecting Existing Homes – *“resisting development that would involve the net loss of two or more homes (from individual or cumulative proposals), unless they:*
- *create large homes in a part of the borough with a relatively low proportion of large dwellings;*
 - *enable existing affordable homes to be adapted to provide the affordable dwelling-sizes that are most needed; or*
 - *enable sub-standard units to be enlarged to meet residential space standards.”*
- 6.13 Policy H4 relates to Maximising the supply of affordable housing. This policy states that *“We will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.”*
- 6.14 Policy H6 Housing Choice and Mix – *“We will seek to secure high quality accessible homes in all developments that include housing. We will:*
- a. *encourage design of all housing to provide functional, adaptable and accessible spaces;*
 - b. *expect all self-contained homes to meet the nationally described space standard;*
 - c. *require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2); and*
 - d. *require 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).”*

- 6.15 Policy H10 Housing with Shared Facilities – *“The Council will aim to ensure that there is continued provision of housing with shared facilities to meet the needs of small households with limited incomes and modest space requirements.*

We will support development of housing with shared facilities (houses in multiple occupation) provided that the development:

- a. will not involve the loss of two or more self-contained homes;*
- b. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it is shown that the site is no longer developable for self-contained housing;*
- c. complies with any relevant standards for houses in multiple occupation;*
- d. contributes to creating a mixed, inclusive and sustainable community;*
- e. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity; and*
- f. is secured as a long-term addition to the supply of low cost housing, or otherwise provides an appropriate amount of affordable housing, having regard to Policy H4 Maximising the supply of affordable housing.*

We will resist development that involves the net loss of housing with shared facilities (houses in multiple occupation) or the self-containment of any part of such a housing unless either:

- g. it can be demonstrated that the accommodation is incapable of meeting the relevant standards for houses in multiple occupation, or otherwise genuinely incapable of use as housing with shared facilities; or*
- h. adequate replacement housing with shared facilities will be provided that satisfies criteria (a) to (f) above; or*
- i. the development provides self-contained social-affordable rented homes.*

Where the Council is satisfied that a development involving the net loss of homes with shared facilities is justified, we will expect it to create an equivalent amount of floorspace for permanent self-contained housing (in Use Class C3), secured as a long-term addition to the supply of low cost housing, or otherwise providing an appropriate amount of affordable housing, having regard to Policy H4.”

6.16 Policy A1 Managing the Impact of Development – *“The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.”*

6.17 Policy D1 Design – *“The Council will seek to secure high quality design in development. The Council will require that development:*

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d. is of sustainable and durable construction and adaptable to different activities and land uses;*
- e. comprises details and materials that are of high quality and complement the local character;*
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
- g. is inclusive and accessible for all;*
- h. promotes health;*
- i. is secure and designed to minimise crime and antisocial behaviour;*
- j. responds to natural features and preserves gardens and other open space;*
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- l. incorporates outdoor amenity space;*
- m. preserves strategic and local views;*
- n. for housing, provides a high standard of accommodation; and*
- o. carefully integrates building services equipment.*

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”

6.18 Policy D2 Heritage – *“Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the*



substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use. 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.*

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas."

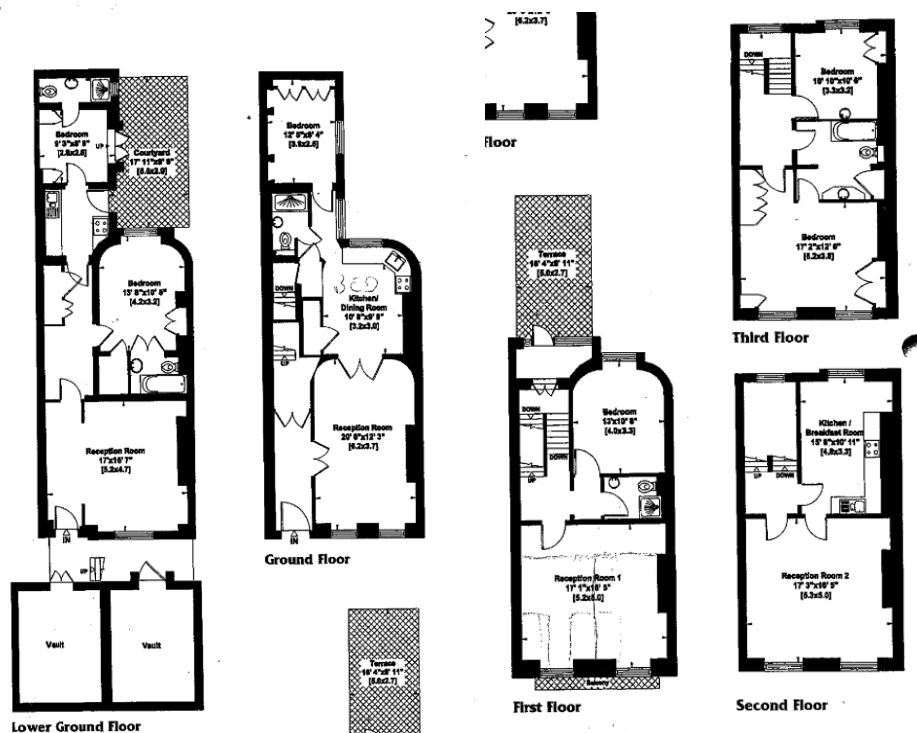
6.19 Policy T2 Parking and Car-Free Development – *"The Council will limit the availability of parking and require all new developments in the borough to be car-free. We will:*

- a. not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits;*
- b. limit on-site parking to:*
 - i. spaces designated for disabled people where necessary, and/or*
 - ii. essential operational or servicing needs;*
 - ii. support the redevelopment of existing car parks for alternative uses; and*
- c. resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking."*

7. Policy Considerations

Principle of Development

- 7.1 The principle of development is established through the historic use of the property as self-contained units. The applicant purchased the property in May 2005 and the layout of the property when purchased was set up as per the image below i.e. 3no. self-contained residential units.



- 7.2 Between 2005 and 2019 the property was used as a single property with visiting teachers/lecturers staying in the premises whilst they were in London. During this time between 5 and 8 people would live in the property at any one time. As they were visiting teachers and the accommodation was part of their package, there are no tenancy agreements associated with their stay. During this time the teachers benefitted from shared amenities including kitchens, bathrooms and living space.
- 7.3 The most significant alterations to the property were carried out over the last three years including works to alter the internal layout to create en-suite rooms to accommodate a larger scale HMO use. It is acknowledged that these works were undertaken without the appropriate listed building consent and have been rectified. Whilst the design changes will be discussed in a separate section, the proposal is seeking to closely follow the original plan form.
- 7.4 The applicant considers that whilst the most recent use of the property was as a large scale HMO (6+ residents) there is insufficient evidence to submit a certificate of lawfulness. Nevertheless,



the conversion into 4no. self-contained residential units will provide the same level of accommodation as the HMO unit when it provided accommodation for 5-8 people.

- 7.5 Policy H3 of the Camden Local Plan seeks to protect existing homes. This policy resists development that would result in the net loss of residential floorspace or would result in the net loss of two or more homes. The proposal will not result in the net loss of any residential floor space as it is a direct conversion. In terms of the HMO units, it is considered that owing to the constraints of the listed building and the need to as closely as possible resemble the original plan form, improvements to the property to create en-suites for all bedrooms would result in harm to the Grade II listed building. The proposal will enable the flats to meet residential units and would provide a higher standard of accommodation.
- 7.6 Policy H10 discusses housing with shared facilities i.e. HMOs. Whilst the council will generally resist development that results in the loss of housing with shared facilities there are exceptions to this policy. Part g. of this policy states that “it can be demonstrated that the accommodation is incapable of meeting the relevant standards for houses in multiple occupation, or otherwise genuinely incapable of use as housing with shared facilities.” Although HMO units can share bathrooms and kitchen facilities, nowadays there is a demand for private bathrooms for HMO units and these are seen as the most desirable properties for tenants to rent, especially following the Covid-19 pandemic. As identified by the unauthorised works, it is not possible to convert the property to HMO appropriate accommodation without causing harm to the fabric of the building. Internal subdivisions and changes to walls are required to create the private bathrooms. However, this ultimately results in harm to the listed building. As stated above, the conversion to self-contained flats results in minimal changes to the internal layout of the Grade II listed building and therefore minimises the harm. It is on that basis that the loss of HMO units can be justified.
- 7.7 With regards to the internal layout, it is considered that there is a principle to making internal changes to the listed building subject to satisfying Policy D2 of the adopted Local Plan which outlines that works will be permitted if no substantial harm or loss to the heritage asset or if it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Therefore, it is considered that there is a principle for internal alterations as long as these are undertaken with the upmost care and seek to be sympathetic and appropriate in the context of the Grade II listed building.
- 7.8 In terms of affordable housing it is considered that the principle does not apply in this instance. Whilst the proposal will result in the uplift of units, it does not seek to add any new residential floor space and therefore would not meet the 100sqm requirement. The wording of the policy is very specific as it requires both the provision of new homes and the additional floor space. Furthermore, on the basis that the property is already divided into two units according to council



tax and the ground and first floor units are under 100sqm combined, it is considered that the policy is not applicable in this instance.

Design

- 7.9 The proposal seeks to create internal alterations to enhance and optimise the listed building to revert as much of the building to its historic built fabric and as closely as possible follow the original plan form. It should also be noted that no extensions are proposed to the property to facilitate its conversion to flats.
- 7.10 At basement level small new internal walls are proposed to create bathrooms and wardrobes to the master bedroom as well as a separate bathroom. These alterations are considered limited and would not alter the original proportions of the rooms. Similar arrangements are proposed at ground floor level with existing doors to the main living accommodation with an original opening which had previously been closed up being reinstated. At first floor level it is proposed that one door will be sealed and an internal historic opening reinstated. As above, these changes are limited and do not alter the proportions of the rooms. The only other change is at third floor level where an existing bathroom will be subdivided through a partial existing wall to create two bathrooms for this development.
- 7.11 As stated above, the alterations to the design of the building are considered limited and unlikely to result in harm.

Heritage

- 7.12 In order to preserve, restore and refurbish the building to prevent it from further degradation, internal alterations are required to the property facilitate its conversion to flats. It should be noted that no external alterations are proposed to the property to facilitate its conversion which is seen as a heritage benefit.
- 7.13 The internal changes proposed to the property have been identified in the design section above. The internal alterations have been deliberately kept to a minimum to limit the harm caused to the property.
- 7.14 At all levels it is proposed that cornicing and original features will be retained and existing doors to be reused. Where new doors are proposed, it is proposed that the doors which have been



removed to facilitate walls being reinstated will be used where possible. If there are insufficient doors or the doors are in such a poor state that they cannot be repaired, identical doors will be installed.

- 7.15 The proposal involves the conversion of the property to 4no. self-contained units and will accurately represent the historic plan form. Whilst internal changes are required to the building this is all associated with the preservation to ensure that the property does not fall into a poor state of disrepair and further erode this historic asset. The internal will maintain the appearance of the building and as such are continued to preserve and enhance the character and appearance of this Grade II listed building and the wider conservation area.
- 7.16 It is considered that the significance of the building principally derives from its external elevations, its group value as part of a unified listed terrace and its contribution to the character and appearance of the Fitzroy Square Conservation Area. It is considered that the harm caused to this Grade II listed building has already been done as a result of the unauthorised works and the proposed development, including the internal and external improvements to the building, are all classified as preservation and enhancement to rectify the historic changes and ensure that the building continues to closely resemble its original plan form.
- 7.17 The public benefits including the removal of unauthorised uPVC windows and their replacement with historically accurate, timber framed sash windows which will improve the group value of the row of terraces are considered to outweigh any harm caused by the proposal. As such, from a heritage perspective, the proposal is thought to be in accordance with the NPPF, the London Plan and local plan policies.

Residential Amenity

- 7.18 The proposed scheme has been designed to ensure residential amenity is optimized to create high quality dwellings for future occupiers. It is important to note from the outset that whilst some bedrooms fall minimally short of the minimum space standards the overall unit sizes are policy compliant. The only reason that the units fall short of these space standards is because it would involve harmful alterations to the fabric of the listed building to ensure that it is policy compliant and it was considered on balance that it was better to have units that fall minimally short of the space standards that result in undue harm to the Grade II listed building.
- 7.19 It is proposed that a 2 bedroom 3 person unit will be provided at lower ground floor level measuring 71sqm which exceeds the minimum space standard by 10sqm. This unit will be dual



aspect and all habitable rooms will benefit from access to natural light, outlook and ventilation.

Whilst the master bedroom will only be 11sqm in area it does benefit from a 2sqm wardrobe. The unit will also include 15sqm of private external amenity space.

- 7.20 A one bedroom unit is proposed at ground floor level which will measure 53sqm and will comply with minimum space standards. The principle rooms would have been the main reception rooms in the property and these will be used for the same purposes. Whilst two doors will be blocked to facilitate the conversion at this level, it is not automatically considered to result in harm.
- 7.21 A dual aspect studio unit is proposed at first floor level measuring 44sqm in area. Minimal alterations are proposed to this room to facilitate the change. Whilst it is accepted that the bedroom for this unit is 12sqm in area it was considered that creating a subdivision to reduce its size to 11sqm would result in more harm to the fabric of the building and the proportions of the rooms. Given that the building is Grade II listed it is anticipated that this arrangement would be considered acceptable given the unique circumstances.
- 7.22 It should be noted that there is an existing duplex unit at the second and third floor levels which has been in existence since the property was purchased and retained as such ever since. This two-storey dual aspect, duplex unit measures 97sqm and contains two bedrooms. The only physical alteration proposed to this unit is that a partial wall in the bathroom will be fully enclosed to allow an en-suite to be created to the master bedroom. It should also be noted that this unit has always retained it's own council tax.
- 7.23 There is an existing upper ground floor terrace at the property which will be accessible to all residents. Whilst private amenity space is not possible for all units, this external amenity space does improve the quality of accommodation. Furthermore, the site is located within 300 metres of Park Square and Regents Park which is considered world class public open space.

Neighboring Amenity

- 7.24 As part of any planning application, it is important to ensure development proposals would not have an adverse impact on neighbouring amenity with regards to light, outlook or increased sense of enclosure.
- 7.25 It is noted that the proposals do not seek to make any external changes or add any new window openings. Therefore, it is considered that the proposals will have no impact on the neighbouring occupiers in regard to outlook, sense of enclosure or levels of daylight as the existing arrangement will be retained.



- 7.26 In regard to noise and disturbance, it is noted that although the property would result in an uplift in the number of comings and goings by virtue of the increased subdivision, this is not automatically considered to result in harm. It is noted that the majority of properties in Conway Street are subdivided into 3 or 4 units or greater and this is an accepted arrangement on this street. Given the presence of neighbouring flats, it is unlikely to be considered that the proposal will result in harm to the character of the area and neighbouring amenity from a noise perspective.

Transport and Highways

- 7.27 As previously referenced, the site is located in a highly accessible area and has a PTAL rating of 6b which is considered 'excellent' access to public transport.
- 7.28 As the site benefits from a PTAL rating of 6b, it is considered that the site is suitable for car-free development.
- 7.29 Secure and sheltered cycle parking facilities will be provided to the front of the property. Six cycle parking spaces will be provided for the proposed units in accordance with cycle standards stipulated within the London Plan (2021). Although the preference is for step free access to the cycle storage it has not been possible in this instance. The cycle storage will be installed in the vaulted area to the front of the property and will be in a safe and secure setting.

Refuse and Recycling

- 7.30 Dedicated refuse and recycling facilities are proposed to the front of the property. These will be located in a dedicated bin store in the vaults. It will be the applicant's responsibility to put the bags on the street on the appropriate refuse collection days.



8. Conclusions

- 8.1 To conclude, it has been demonstrated that the proposal would be compliant with national, regional and local planning policies. The historic use of the property was as flats, including its original plan form when the property was purchased for the applicant in 2005 and therefore the proposal most closely resembles this historic arrangement. This has been further evidenced by existing council tax records. Whilst the property was used as HMO accommodation for visiting teachers in the intervening years, it has not been on a regular and consistent basis to have sufficient evidence to corroborate that use.
- 8.2 The conversion to flats has been designed to minimise the internal alterations to the property to limit the harm to the property and ensure the proposal maintains the original proportions and layouts of the room. The units have been designed to a high quality to ensure that all units are dual aspect and will comply with minimum space standards. Given the proliferation of flatted development in the immediate locality the subdivision is not considered to result in harm to the amenities of adjoining occupiers.
- 8.3 With regards to heritage, it has been identified that there have been some harmful historic changes to the building which the applicant is seeking to amend. Unauthorised works will be rectified as part of this proposal and insensitive materials replaced with historically accurate materials. Minimal changes to the historic internal fabric of the building are required to facilitate the subdivision. It is considered that the benefits of restoring and reinstating the Grade II listed building outweigh the historic harm and ultimately the proposal will preserve and enhance the character and appearance of the Grade II listed building and wider conservation area.