



Planning, Design & Access Statement

**PLANNING APPLICATION &
LISTED BUILDING CONSENT
BY:**

MR AMBROSE & MS GOULD

RELATING TO:

**10 THANET STREET
LONDON
WC1H 9QL**



01689 836334



enquiries@replanning.co.uk



www.replanning.co.uk

Robinson Escott Planning LLP,

Downe House, 303 High Street, Orpington, Kent BR6 0NN

1. INTRODUCTION

1.1. We are instructed by our clients Mr R Ambrose & Ms S Gould to prepare this Planning, Design & Access Statement in support of a planning application and listed building consent for the following development at No.10 Thanet Street, London:

“Conversion of existing 2no. flats into 1no. dwelling; erection of lower ground floor rear extension; internal and external works associated with restoration of property.”

1.2. I am familiar with the site and the surrounding area and have studied carefully the site’s planning history and have then advised on the preparation of this application for planning permission. This submission follows the approval of Lawful Development Certificate 2023/0430/F which permitted the following:

“Amalgamation of two flats into a single dwellinghouse (Class C3).”

1.3. This statement should be read in conjunction with the plans prepared by Insideout and Heritage Statement which has been undertaken by Fuller Long.

2. APPLICATION PROPOSAL

2.1. The proposal seeks planning permission and listed building consent for the following development:

“Conversion of existing 2no. flats into 1no. dwelling; erection of lower ground floor rear extension; internal and external works associated with restoration of property.”

2.2. Although the Council have concluded that the amalgamation of the existing building from 2no. flats to 1no. dwelling does not require planning permission, listed building consent for the associated works involving the conversion still requires approval.

2.3. Permission is sought to erect a lower ground rear extension which will comprise a bedroom. The extension will consist of a flat zinc roof and rendered facades. The existing fire/garden access from the kitchen will be retained along one side of the flat roof. The extension will have 1.8m privacy screens on either side.

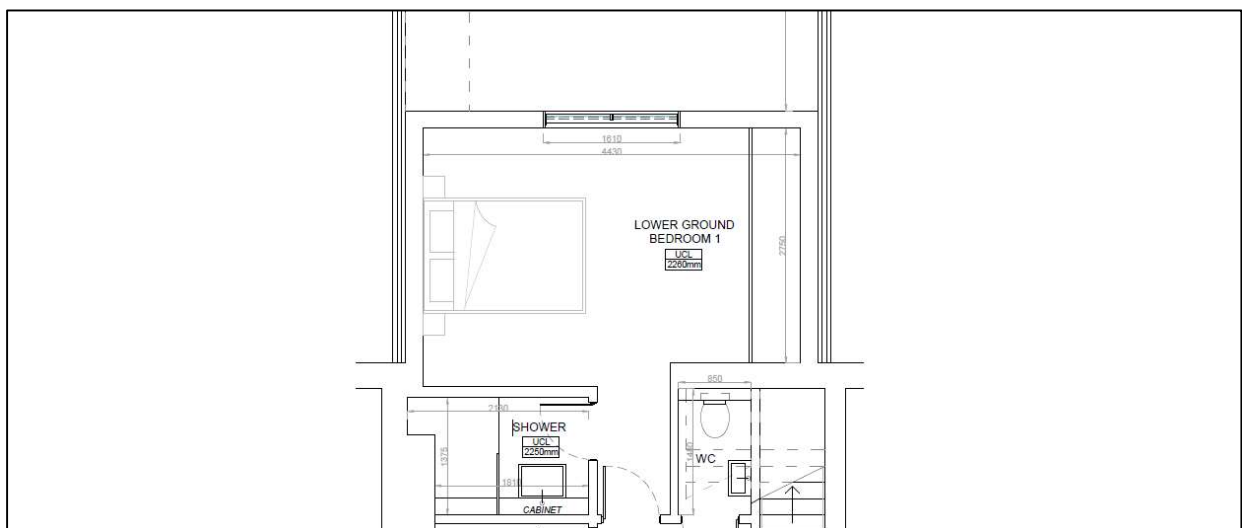


Figure 1: Proposed lower ground floor plan.



Figure 2: Proposed rear elevation.

2.4. The application scheme proposes a number of internal and external alterations and modifications to the existing building to facilitate the amalgamation of the existing building into 1no. dwelling as well as the full restoration of the property. A full description of these is documented in the prepared **Heritage Statement**.

3. SITE AND SURROUNDINGS

3.1. The application site is situated on the eastern side of Thanet Street circa 325m from Kings Cross railway station. It comprises a lower ground floor flat and ground and first floor flat.



Figure 3: OS Map.

3.2. The property comprises a mid-terrace dwelling which is Grade II listed. The listing description is outlined below:

Terrace of 10 houses. c1820-22. Probably by James Burton. Yellow stock brick (No.8 painted) with stucco ground floors (Nos 8-11 and 16 rusticated). Stucco bands at 1st floor level and parapets. 2 storeys and basements. 2 windows each; No.13 with extra, central blind window and segmental-arched mews entrance. Round-arched ground floor openings. Doorways with pilaster-jambs carrying cornice-heads; fanlights (nos. 8, 10, 13 & 15 patterned) and panelled doors (No.8, C20). Gauged brick flat arches to recessed sashes; 1st floor with cast-iron balconies (except No.17). INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas. (Survey of London: Vol. XXIV, King's Cross Neighbourhood, St Pancras IV: London: -1952: 87).



Figure 4: Front elevation of application site.

3.3. The application site forms part of a terrace of ten houses on the east side of Thanet Street. The building is of two main storeys set above a lower ground floor level. It is set back behind a shallow lightwell which is surrounded by painted iron railings. The front façade is constructed of yellow stock brick with rusticated stucco at ground floor level and smooth render beneath to the lower ground floor. The front elevation is two window bays wide. The roofscape of the building is concealed behind the brickwork parapet and has a traditional valley form. There is an existing metal staircase to the rear of the property to facilitate access to the rear garden area.



Figure 5: Rear elevation of property.

3.4. There are other examples of rear extensions along the eastern side of Thanet Street.



Figure 6: Other extensions along eastern side of Thanet Street.

- 3.5. The application site is also situated in the Bloomsbury Conservation Area. A detailed analysis of the site and history of the area is documented in the **Heritage Statement**.

4. **PLANNING HISTORY**

(i) **Site**

4.1. The following planning history is recorded for the property:

- CTP18519 - The enlargement of the existing basement front window by renewing the existing and installing 2 new sash windows on either side and a new reinforced concrete lintel above. Conditional permission granted 23/07/1974.
- CTP782 - The enlargement of the existing basement front window at 10, Thanet Street, WC1 by renewing the existing and installing 2 new sash windows either side and a new reinforced concrete lintel above. Conditional permission granted 23/07/1974.
- 18825 - The alteration of the rear elevation by the enlargement of a second floor window, the replacement of the basement ' windows by a smaller ' window and a ' window, and the provision of a new soil stack and rain water pipe. Conditional permission granted 15/10/1974.
- HB807 - Internal alterations to provide a new lavatory on the second floor at 10 Thanet Street W.C.1. and the alteration of the rear elevation by the enlargement of a second floor window, the replacement of the basement sash window by a smaller sash window and a louvred window, and the provision of a new soil stack and rain water pipe. Conditional Listed Building Consent granted 15/10/1974
- 8800515 - Established Use Certificate in respect of the basement and top maisonette as separate flats (approved – 18 January 1989)
- 2023/0430/P - Amalgamation of two flats into a single dwellinghouse (Class C3) (granted – 3 April 2023).

4.2. As identified in the introduction the Council have accepted the principle of converting the existing 2no. flats into one dwelling.

(ii) **Adjoining Sites**

4.3. A full assessment of permitted extensions in the surrounding area is documented in the **Heritage Statement**.

5. LEGISLATIVE BACKGROUND & PLANNING POLICY

5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications should be determined in accordance with the development plan, unless material considerations indicate otherwise. This is reinforced in paragraph 11 of the Framework (outlined below). Having reviewed relevant policy, it is my view that the proposal complies with the development plan and there are no material considerations that would indicate that planning permission should be refused. The development, therefore, benefits from the statutory presumption in favour of development that accords with the development plan.

5.2. Of relevance to this application are the strategic policies in the London Plan 2021 (and SPG) and the detailed policies within the Camden Local Plan 2017. The following documents have also been reviewed:

- Amenity – Camden Planning Guidance – January 2021
- Design – Camden Planning Guidance – January 2021
- Bloomsbury Conservation Area Appraisal and Management Strategy - 2011

5.3. It is also necessary to consider the Government’s planning policy objectives as set out in the National Planning Policy Framework.

National Planning Policy Framework 2021

Section 12 – Achieving well designed places

5.4. Paragraph 126 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective

engagement between applicants, communities, local planning authorities and other interests throughout the process.

5.5. Section 130 outlines that planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks;
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience

5.6. Paragraph 134 outlines that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Section 16 – Conserving and enhancing the historic environment

- 5.7. Paragraph 194 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.
- 5.8. Paragraph 195 outlines that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 5.9. Paragraph 197 advises that in determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.

5.10. Paragraph 199 outlines that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

5.11. Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional;

5.12. Paragraph 201 states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total 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; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, 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.

- 5.13. Paragraph 202 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.
- 5.14. Paragraph 203 advises that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 5.15. Paragraph 206 advises that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 5.16. Paragraph 207 outlines that not all elements of a Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole.
- 5.17. Paragraph 208 outlines that local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.
- 5.18. Annex 2 of the framework defines conservation as: *“The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its*

significance.” The definition of conservation also confirms that change should be embraced and not resisted. Change is only harmful insofar as it erodes significance.

5.19. Significance is defined within Annex 2 as the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

5.20. Harm is defined by Historic England as change which erodes the significance of a heritage asset.

London Plan 2021

5.21. Policy D1 outlines that Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas’ capacity for growth.

5.22. Policy D3 outlines that all development must make the best use of land by following a designed approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

5.23. Under Policy D3, development proposals should:

5.24. Form and layout

1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions

2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area

3) be street-based with clearly defined public and private environments

4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

5.25. Experience

5) achieve safe, secure and inclusive environments

6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest

7) deliver appropriate outlook, privacy and amenity

8) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity

9) help prevent or mitigate the impacts of noise and poor air quality

5.26. 10) achieve indoor and outdoor environments that are comfortable and inviting for people to use

5.27. Quality and character

11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character

12) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well

13) aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy

14) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

5.28. Policy D6 sets out standards on housing quality for future and existing residents.

5.29. Policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Camden Local Plan 2017

5.30. Policy H3 of Camden's Local Plan 2017 seeks to protect existing housing by resisting development that would involve the net loss of two or more homes but allows for the loss of one residential unit. As the proposal would only involve the loss of one residential unit, it is considered to comply with policy. Paragraph 3.75 of the Local Plan 2017 states that:

"Net loss of one home is acceptable when two dwellings are being combined into a single dwelling. Such developments can help families to deal with overcrowding, to grow without moving home, or to care for an elderly relative. Within a block of flats or apartments, such a change may not constitute development. However, the Council will

resist the incremental loss of homes through subsequent applications to combine further homes within the same building or site”.

5.31. Policy A1 states that the Council will seek to protect the quality of life of occupiers and neighbours. The Council will grant permission for development unless this causes unacceptable harm to amenity. The Council will:

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;
- b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;
- c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
- d. require mitigation measures where necessary. The factors we will consider include:
 - e. visual privacy, outlook;
 - f. sunlight, daylight and overshadowing;
 - g. artificial lighting levels;
 - h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;
 - i. impacts of the construction phase, including the use of Construction Management Plans;
 - j. noise and vibration levels;
 - k. odour, fumes and dust;
 - l. microclimate;
 - m. contaminated land; and
 - n. impact upon water and wastewater infrastructure.

5.32. Policy D1 outlines that 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.

5.33. Policy D2 states that the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Planning (Listed Buildings and Conservation Areas) Act 1990

5.34. Section 66 of the Act describes the statutory duties relating to planning permission for development that will affect a listed building or its setting and Section 66(1) reads:

“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

5.35. As the proposal is located within a Conservation Area, Section 72 of the Act is also relevant. This places a duty on decision maker, in considering development in a conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

6. **PLANNING MERITS**

6.1. In light of the foregoing policy assessment and description of the proposed development, the following main issues will be considered:

- Principle of Development
- Heritage / Design
- Residential Amenity
- Quality of Accommodation
- Other Planning Considerations

Principle of Development

6.2. The proposal seeks to amalgamate the existing 2no. flats into one standalone dwelling. It has been confirmed under lawful development certificate 2023/0430/P that this is acceptable in principle and does not constitute development as defined by section 55 of the Town & Country Planning Act 1990, and therefore would not require planning permission. Nonetheless the proposal would be in line with Policy H3 of the Camden Local Plan 2017 in any event.

6.3. The principle of extending and refurbishing the property back into one property is also considered acceptable, subject to the below material planning considerations.

Heritage / Design

6.4. The proposed extension and refurbishment works have been carefully and sensitively considered with full input from Fuller Long, the appointed Heritage Consultants, given the heritage designations associated with the property.

6.5. In respect of heritage and design, the conclusions of the instructed **Heritage Statement** states:

“The proposed deconversion of the building from two flats to a single dwelling house represents a significant enhancement to its special architectural and historic interest, reconnecting the lower ground floor with the upper storeys and reintroducing the correct vertical circulation route through the house.

The deconversion will be accompanied by a full programme of repair and refurbishment, which will significantly enhance the character of the house and secure its historic fabric for the long term.

The proposed rear extension is the main external alteration to the building and will be located discreetly, at the rear and at low level. It will sit comfortably within the context and pattern of lower ground floor additions along the terrace. The front, high significance façade of the listed building will be repaired and refurbished, maintaining the positive contribution of the building to the character and appearance of the Bloomsbury Conservation Area.

Internal changes to the plan form of the house are limited to the lower ground floor, an area of low significance and to the rear room at 1st floor level where a reversible partition will create a dressing room and bathroom area. These reasonable adaptations to the flow and layout of the house will provide a better balance of living vs bedroom space and will upgrade the building to an attractive family home.

Overall, the proposals are considered acceptable and will cause no harm to the special architectural or historic interest of the listed building. The proposed works are considered to satisfy the statutory requirements of the Planning (Listed Building and Conservation Areas) Act 1990. They will fully comply with the requirements of the London Borough of Camden’s Local Plan 2017 and associated Supplementary Planning Guidance and Conservation Area Management Guidelines The proposals will accord

with the provisions of the National Planning Policy Framework 2021 in particular ensuring that the significance of the heritage asset is sustained and enhanced.”

6.6. given the conclusions of the **Heritage Statement**, the proposals satisfy the statutory requirements of the Planning (Listed Building and Conservation Areas) Act 1990. They will fully comply with the requirements of Section 12 and 16 of the NPPF and the Camden Local Plan 2017 and associated Supplementary Planning Guidance and Conservation Area Management Guidelines.

Residential Amenity

6.7. The proposed rear lower ground floor extension has been sensitively designed to preserve neighbouring amenity by ensuring there will be no loss of light, outlook or privacy to adjoining residents.

6.8. In terms of depth the rear extension will be 2.9m in size and will therefore not be excessive in scale and will reflect other additions along the terraced row. Due to the rising land levels to the rear of the property, the lower ground floor extension will be modest in scale and therefore will not reduce the outlook or light of Nos.9 and 11 Thanet Street. The privacy screens will not exceed the height of ground floor windows and therefore will also not harm the amenity of neighbouring properties by way of loss of light and outlook either.

6.9. No windows on the proposed extension will overlook adjoining residents and any changes to the window fenestration will also not result in any loss of privacy.

6.10. The proposal retains the ground floor garden access as existing. This will be retained for access into the rear garden only and will not create a new terrace on the roof of the lower ground floor extension. The installation of privacy screens on either side of the extension will ensure that there will be no overlooking into the rear garden of either adjoining property which will enhance

the privacy of these properties, when compared to the existing situation, which has no screening.

6.11. The internal restoration works will not have any impact on adjoining neighbours.

6.12. For the above reasons, the proposed development will be in accordance with Section 12 of the NPPF, Policy D6 of the London Plan and Policy A1 of the Camden Local Plan.

Quality of Accommodation

6.13. The proposed development significantly enhances the quality of accommodation at the site and will restore the property back to a family dwelling. The proposal will be fully compliant with London Plan floor space standards and will provide high levels of light and outlook for the applicants.

6.14. The proposal is therefore in accordance with Section 12 of the NPPF and Policy D6 of the London Plan.

Other Planning Considerations

(i) Community Infrastructure Levy (CIL)

6.15. The relevant CIL paperwork has been completed and is appended to the submission.

7. PLANNING BALANCE & CONCLUSION

- 7.1. This Planning, Design and Access Statement has demonstrated that the principle of development, to convert the building from 2no. apartments to 1no. dwelling is acceptable.
- 7.2. Through careful design and conclusions of the **Heritage Statement** it has been outlined that the proposals satisfy the statutory requirements of the Planning (Listed Building and Conservation Areas) Act 1990. They will fully comply with the requirements of Section 12 and 16 of the NPPF and the Camden Local Plan 2017 and associated Supplementary Planning Guidance and Conservation Area Management Guidelines.
- 7.3. The development will preserve neighbouring amenity and will not result in the loss of light, outlook or privacy to adjoining residents. It has also been outlined that the proposal will provide a high standard of accommodation for the future residents.
- 7.4. In view of the above, it is concluded that the development proposed in this application is consistent with the aims and detailed requirements of the National Planning Policy Framework and the Development Plan and as such, should be given planning permission and listed building consent.