

<b>Delegated Report</b>		<b>Analysis sheet</b>		<b>Expiry Date:</b> 21/04/2023			
		N/A		<b>Consultation Expiry Date:</b> 23/04/2023			
<b>Officer</b>			<b>Application Number(s)</b>				
Brendan Versluys			1) 2023/0808/P 2) 2023/1202/L				
<b>Application Address</b>			<b>Drawing Numbers</b>				
Flat 8 70 Guilford Street London WC1N 1DF			See decision notice				
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>				
<b>Proposal(s)</b>							
Infill roof extension to create a mezzanine level with habitable rooms, involving reconfiguration of the existing 2x third floor flats.							
<b>Recommendation(s):</b>		<ol style="list-style-type: none"> <li>1. Refuse Planning Permission</li> <li>2. Refuse Listed Building Consent</li> </ol>					
<b>Application Type:</b>		<ol style="list-style-type: none"> <li>1. Full Planning Permission</li> <li>2. Listed Building Consent</li> </ol>					
<b>Conditions or Reasons for Refusal:</b>		Refer to Draft Decision Notice					
<b>Informatives:</b>							
<b>Consultations</b>							
<b>Adjoining Occupiers:</b>		<b>No. notified</b>	0	<b>No. of responses</b>	1	<b>No. of objections</b>	1
<b>Summary of consultation responses:</b>		<p>Site notices were displayed in proximity to the site from 24/03/2023 (expiring 17/04/2023). The application was also advertised in the local press from 30/03/2023 (expiring 17/04/2023).</p> <p>One objection was received on behalf of the owners of 68-69 Guilford Street, which adjoins the application site to the west. The objection comments on the loss of sunlight and daylight that would result though the implementation of the roof extension and it blocking out two windows, which are the main windows of the two top floor studios at this adjoining property. Amenity effects are discussed in Section 4 of this report.</p>					

**Bloomsbury  
Conservation Area  
Advisory Committee  
(BCAAC)**

The BCAAC objected on the following grounds:

*Observations*

- *Appears to be a new officer.*
- *There are no documents uploaded*

*Actions*

- *The committee objects.*
- *Documents must be uploaded promptly to the site as part of validation checks.*

BCAAC were contacted by the planning officer on 31/05/2023, advising all application was publicly accessible / visible on Council's website. No response was received.

## Site Description

The subject site is a 1790s era townhouse, one of terrace of three townhouses comprising 70 and 71-72 Guilford Street. The townhouse accommodates eight flats over the lower ground to third floors. The existing third floor accommodates 2 x one bedroom flats. A rooflight is located over the communal staircase.

The townhouse is Grade II listed, as are the adjoining townhouses at 71-72 Guilford Street, and located within the Bloomsbury Conservation Area. The site is part of a wider terrace with a mix of late Georgian / Victorian architectural styles extending the length of the street block from the junction with Herbrand Street and the junction with Grenville Street.

The Bloomsbury Conservation Area Statement and Strategy makes the following comment with regard to the application townhouses and wider group of terraces.

*The part of Guilford Street within the sub area contains a grade II listed terrace of townhouses which adheres to a grander scale than other terraces in the area. These date from 1791-4 and were built by James Burton; the historic fabric of the terrace only partially survives and the properties have been much altered. This terrace when built formed the north side of Queen Square, and its centrepiece is marked by a colonnade on the front façade.*

## Relevant History

**2011/6464/P** - Change of use of 71 and 72 Guilford Street from nurses hostel (sui generis) and office use (Class B1) to a backpacker hostel (sui generis) with reinstatement of the front door and railings to 72 Guilford Street to match 71 Guilford Street. Change of use of 70 Guilford Street from a nurses' hostel (sui generis) and office use (Class B1) to 5 x 1-bedroom flats, 1 x 2-bedroom flat and 2 x 3-bedroom flats, external alterations including installation of balustrades and replacement of existing windows with doors for the provision of roof terraces to the rear at first and second floor level, alterations to fenestration at the front, side and rear elevation. Alterations at roof level to properties including installation of rooflights and lift overrun. **Granted 23/07/2012**

**2013/7992/L** - Internal alteration to layout of the floors and amendment to approved scheme 2011/0915/L granted on 24/07/2012 for change of use from hostel and office use to residential. **Granted 28/02/2014**

## Relevant Policies

### National Planning Policy Framework 2021

### The London Plan 2021

### Camden Local Plan 2017

Policy A1 Managing the impact of development

Policy D1 Design

Policy D2 Heritage

### Camden Planning Guidance (CPG)

CPG Design (January 2021)

CPG Amenity (January 2021)

CPG Home Improvements (2021)

### Bloomsbury Conservation Area Character Appraisal and Management Strategy (2011)

## Assessment

### 3. Proposal

- 3.1. Planning permission and listed building consent is sought for the construction of a roof extension, being a proposed fourth floor, accommodating habitable rooms to serve Unit 8 (the southern unit on the third floor).
- 3.2. The existing layout of Unit 8 would be reconfigured, and the unit converted into a two-level maisonette over the third floor and proposed new fourth floors.
- 3.3. The reconfigured and extended unit would accommodate two bedrooms, ensuite, bathroom and hallway at the third floor, with an extended staircase connecting to the proposed fourth floor, which would accommodate a living room, bedroom and bathroom. A 7m<sup>2</sup> terrace with glass balustrade would be inset to the pitched roof at the fourth floor on the south elevation, accessible from the bedroom. A rooflight would also be positioned to the fourth floor bedroom.
- 3.4. The construction works would involve the following key elements:
  - Extend the existing roof with an infill between valleys, forming a hipped roof with central ridge at apex.
  - Create an inverted dormer on the front elevation and sloping roof to match existing in between, behind the front parapet, retain existing railings, add glazed railings behind the railings to make up for the height difference, as required by Building Control.
  - Create one large dormer at the rear, behind existing parapet.
  - Extend the smaller staircase from the 3rd floor, inside Unit 8, to the mezzanine on the 4th floor.
  - Create a void from the existing staircase at 3rd floor, to connect to an AOV rooflight at the top of the new roof.
- 3.5. The proposed roof would be constructed with slate to match existing. The dormer at the rear would have three sets of casement windows with timber frames, painted white, and have lead surrounds and cheeks.

## **4. Planning Considerations**

4.1. The material considerations in the determination of this application are as follows:

- Design and Heritage
- Amenity

4.2. As the application site is situated within a Conservation Area and the building is Grade II listed, the following statutory provisions are relevant to the determination of these applications are Section 16, 72 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013.

4.3. Section 16 requires that in considering whether to grant listed building consent for development which affects a listed building, the local planning authority shall have special regard to the desirability of preserving the listed building, its setting and its features of special architectural or historic interest.

4.4. Section 66 of the Act requires that in considering whether to grant planning permission for development which affects a listed building, the local planning authority shall have special regard to the desirability of preserving the listed building, its setting and its features of special architectural or historic interest.

4.5. The NPPF terms listed buildings designated heritage assets. Section 12 of the NPPF provides guidance on managing change to designated heritage assets through the planning system, including avoiding or justifying harm to the special architectural or historic interest of listed buildings. Paragraph 134 states that “less-than-substantial harm” to a designated heritage asset must be outweighed by the public benefits secured by the proposals, including heritage benefits to the assets.

4.6. The significance of the listed building derives from its architectural design and materials, planform, evidential value as 1790s townhouse, its immediate group value with numbers 71 and 72, its wider group value with 61-69 (all Grade II listed) and its positive contribution to the character and appearance of the Bloomsbury Conservation Area.

### **Assessment of proposals**

## **5. Design and Heritage**

5.1. No 70 Guilford Street is a Grade II listed building, as are the buildings fronting Guilford Street from 61-66 – 75-82 Guilford Street. The Council has a statutory duty to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses, under Sections 16 and 66 of The Planning (Listed Buildings and Conservation Areas Act) 1990 (as amended).

5.2. The application site is located within the Bloomsbury Conservation Area, wherein the Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area, in accordance with Section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

5.3. Local Plan Policies D1 (Design) and D2 (Heritage) are aimed at achieving the highest standard of design in all developments. Policy D1 requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area; and 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 and listed buildings.

5.4. The CPG Home improvements states the following in regard to roof extensions:

*A successful roof extension would consider the overall roof form of the existing building, adjoining buildings and impact in key views (when relevant) and be proportionate to the roof slope being extended.*

*For buildings in Conservation Areas, the Conservation Area Appraisals identify if certain terraces or groups of buildings are significant due to their unbroken roofline, which means they hold heritage value. If subsequent development since the Conservation Area Appraisal has been issued, has altered the unbroken roofline, weight shall be given to the existing extensions, in the assessment of a new roof extension.*

5.5. Although helpful, it is noted that the CPG does not provide any further guidance in relation to listed buildings, which need a higher level of care and attention. It does not however that 'the texture, colour, pattern and finish of materials (detailing) should relate well to the existing character and appearance of both the existing home and the wider area, particularly in Conservation Areas and listed buildings.

5.6. The CPG Design states that a roof alteration or is likely to be acceptable where:

- *'Good quality materials and details are used and the visual prominence, scale and bulk would be appropriate having regard to the local context;*
- *There is an established form of roof addition or alteration to a group of similar buildings and where continuing the pattern of development would be a positive design solution, e.g. helping to reunite a group of buildings or townscape;*
- *Alterations are architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form.*

5.7. The CPG also states a roof alteration or addition is likely to be unacceptable in the following circumstances where there is likely to be an adverse effect on the skyline, the appearance of the building, or the surrounding street scene:

- *There is an unbroken run of valley roofs;*
- *Complete terraces or groups of buildings have a roof line that is largely unimpaired by alterations or extensions, even when a proposal involves adding to the whole terrace or group as a coordinated design;*
- *Buildings or terraces which already have an additional storey or mansard;*
- *Buildings already higher than neighbouring properties where an additional storey would add significantly to the bulk or unbalance the architectural composition;*
- *Buildings or terraces which have a roof line that is exposed to important London-wide and local views from public spaces;*
- *Buildings whose roof construction or form are unsuitable for roof additions such as shallow pitched roofs with eaves;*
- *The building is designed as a complete composition where its architectural style would be undermined by any addition at roof level;*
- *Buildings are part of a group where differing heights add visual interest and where a roof extension would detract from this variety of form;*
- *Where the scale and proportions of the building would be overwhelmed by additional extension.*

5.8. 70 Guildford is part of a group of three houses (70, 71 and 72 Guildford) which all share the same roof profile. Although the roof's covering materials have likely been replaced several times since the 1790s, the general form of the roof is historically correct and matches the form of the adjoining buildings as part of the same group of terraces to the east at 71 and 72 Guildford Street.

- 5.9. The removal of the existing original, multi-gable roof form and its replacement with the hipped roof-form proposed harms the significance of the listed building, and its immediate setting which includes the relationship with 71-72 Guilford and their matching roof form which form part of a set of roofs with the same roof profile. The alteration to the roof form would also harm the building's otherwise positive contribution to the character and appearance of the conservation area. The proposed windows of the roof extension are also considered unsympathetic to the host building.
- 5.10. Notwithstanding the context and significance of the existing, distinctly separate and matching roof form of 70 – 73 Guilford Street, it is noted that other houses in the wider terrace have had replacement roof extensions; however these replaced non-historic roof forms. It is noted that 70 Guilford retains its original roof-form. Therefore, there is no tangible precedent set by other existing roof extensions in the wider group of terraces which could supersede the significance of 70 Guilford's existing roof form and its significance as a distinct separate group of three with original roof-forms.
- 5.11. 70 Guildford has an entirely concealed roof at present, and this is clearly part of its neo-classical form and character. The proposed alteration to the roof would be publicly visible from Queen Square. It is accepted that the consented roof extension at 67 Guilford is also visible from Queen Square, a public garden to the south of the site, however 67's roof extension replaced a roof extension of a similar arrangement. The visibility of the proposed roof extension from a key area in the public realm only adds to the visible harm caused to the listed building through the proposed roof extension.
- 5.12. The internal works to extend the main staircase also has a harmful impact on the legibility of the historic circulation and plan-form and the vertical hierarchy of the building.
- 5.13. Overall, the proposed removal of the existing roof, the form, scale and design of the new roof, and the extension of the existing staircase causes less than substantial harm to the special architectural and historic interest of the listed building by reason of the loss of the original design of the roof, the potential loss of 1790s fabric, the loss of the consistency of the roof forms of the listed group (Numbers 70, 71 -72).
- 5.14. The proposed removal of the existing roof, the form, scale and design of the new roof causes harm to the character and appearance of the Bloomsbury Conservation Area.
- 5.15. There are no public benefits of a nature adequate to outweigh the harm caused under Para 202 of the NPPF.

## **6. Residential Amenity**

- 6.1. Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The policy notes that the factors to consider include: visual privacy and outlook; sunlight, daylight and overshadowing; artificial lighting levels; impacts of the construction phase; and noise and vibration.
- 6.2. The proposed extension would block out the party wall side elevation windows, to the habitable rooms of the 2x top floor studio flats at 68-69 Guilford Street. The habitable rooms of the two studios only benefit from one small rooflight each and therefore the east facing windows make an important contribution to the amount of sunlight and daylight. The removal or enclosure of these windows would create a negative impact on the level of amenity to the residents of these flats. The proposed development would create a significant sense of enclosure as well as loss of outlook.
- 6.3. The adjoining eastern property at 72 Guilford Street does not accommodate any windows on its side elevation with the application site.

- 6.4. With the exception of 68-69 Guilford Street where the loss of sunlight and daylight would be unacceptable, noting the scale and form of the roof extension being commensurate with other existing roof extensions in the same group of terraces, the extension would not give rise to unacceptable overlooking, loss of sunlight or daylight, and light pollution effects.
- 6.5. The proposed living area and bedroom are adequately sized and dimensioned for their intended purposes. These rooms are also designed and oriented to receive adequate sunlight and daylight.
- 6.6. Overall, whilst it could be considered that the side windows of 68-69 Guilford Street are taking its fair share of light across a neighbouring property through being on a party wall with the application site, the proposed roof extension would have an impact on the light to the two existing dwelling in terms of loss of sunlight and daylight. The proposal is not considered to give rise to any adverse impacts on residential amenity of any other residential property in the vicinity. In addition, appropriate onsite amenity would be provided.

## **7. Planning Balance and Conclusion**

- 7.1. Considerable importance and weight has been attached to the desirability of preserving or enhancing the character or appearance of the Mansfield Conservation Area, and the settings of any listed buildings, under s.72 of the Planning (Listed Buildings and Conservation Areas Act 1990) as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.
- 7.2. Local Plan Policies D1 and D2, and Chapter 16 (Conserving and enhancing the historic environment) of the NPPF, seeks to preserve and enhance designated heritage assets. The NPPF states in Paragraphs 201 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”.
- 7.3. As discussed above, there are no public benefits of a nature adequate to outweigh the harm caused by the proposed works.
- 7.4. Offsite amenity effects are considered unacceptable in relation to 68-69 Guilford Street.
- 7.5. Overall, therefore, on balance, the proposed development does not accord with Chapter 16 of the NPPF which seeks to preserve and enhance heritage assets. The proposal is also contrary to Policies D1 and D2 of the Local Plan. As such, the proposal is considered to be unacceptable in terms of design, appearance, and location.
- 7.6. The proposal would therefore fail to accord with Policies D1 and D2 of the Camden Local Plan 2017. The development would result in unacceptable harm to the host building and adjacent listed buildings at 71 – 72 Guildford, and the setting and character of the Conservation Area.

## **8. Recommendations**

- 8.1. Refuse Planning Permission
- 8.2. Refuse Listed Building Consent