

Application ref: 2022/5654/PRE
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Date: 03/03/2023

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Mandip Singh Sahota
NTA Planning
46 James Street
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Dear Sir/Madam

Address:

2 - 4 Doughty Mews
London
WC1N 2PG

Proposal: Erection of roof extension and front roof terraces for both the Egyptian Exploration Society building and residential apartment with front roof terraces. Alterations to fenestrations on ground and first floor, new cycle stores and energy efficiency measures.

Drawing Nos: EES_SB_EX_AL_200 (P1), EES_SB_EX_AL_300 (P1),
EES_SB_PR_AL_200 (P1), EES_SB_PR_AL_300 (P1), Pre-application Enquiry Document
(Rev B), Pre-app Statement (December 2022), Design Addendum Pack

Site constraints

- Article 4 Direction – Basement Development
- Article 4 Direction – E to C3
- Bloomsbury Conservation Area Conservation Area
- Knowledge Quarter Innovation District
- Background Consultation Area from Blackheath point
- View from Primrose Hill to St Pauls
- Underground development constraint - Slope Stability
- Underground development constraint – Subterranean (groundwater) flow

Relevant planning history

29022 - Use of the property as a residential dwelling house, together with works of conversion.(Granted 19/09/1979)

28014 - Change of use from storage to residential and works of conversion to form a dwelling house. (Granted 04/07/1979)

Relevant policies and guidance

National Planning Policy Framework (NPPF) 2021

The London Plan 2021

Camden Local Plan 2017

Policy A1 Managing the impact of development
Policy A4 Noise and Vibration
Policy A5 Basements
Policy D1 Design
Policy D2 Heritage
Policy H3 Protecting existing homes
Policy H2 Maximising the supply of self-contained housing from mixed use schemes
Policy H7 Large and small homes
Policy C6 Access for All
Policy E1 Economic Development
Policy E2 Employment sites and premises
Policy T1 Prioritising walking, cycling and public transport
Policy T2 Parking and car free development
Policy CC1 Climate change mitigation
Policy CC2 Adapting to climate change

Camden Planning Guidance

Access for All CPG 2019
Amenity CPG 2021
Biodiversity CPG 2021
Community uses, leisure and pubs CPG 2021
Developer Contributions CPG 2019
Design CPG 2021
Energy efficiency and adaptation CPG 2021
Employment Sites and Business premises CPG 2021
Housing CPG 2021
Transport CPG 2021
Water and Flooding CPG 2021

Bloomsbury Conservation Area Statement (2011)

Site and surroundings

The site lies towards the southern end of Doughty Mews. The site is unlisted and lies within the Bloomsbury Conservation Area. The building is identified as a positive contributor in the Bloomsbury Conservation Area Appraisal and Management Strategy 2011.

The Egypt Exploration Society (EES) is located on the eastern side of Doughty Mews which can be accessed off both Roger Street (to the south) and Guilford Street (to the north) in the heart of Bloomsbury. The site is located near to its cultural partners at the British Museum and Petrie Museum of Egyptian and Sudanese Archaeology at UCL.

The site currently comprises three 2-storey adjoining mews houses and accommodates the EES over ground and part first floor, together with a self-contained flat which occupies the remainder of the first-floor level. The Society moved into this location in 1968 and since this time has provided grants to research projects around the world and communicated the results of this work to almost 2,000 international members through publications and events. The London headquarters includes a publicly accessible library of almost 20,000 volumes, one of the largest such collections in the UK, as well as a unique archive documenting the history of British archaeology in Egypt since 1882.

ASSESSMENT

The principal planning considerations are the following:

- Principle of Development
- Design and Heritage
- Neighbouring amenity
- Transport
- Energy and sustainability

1. Principle of Development

The proposal includes various external and internal alterations to the buildings at 2-4 Doughty Mews. These buildings are made up of two uses F1 (Learning and non-residential institutions) and C3 (Residential). To be clear the report covers a proposal which will not create additional units of either use class just increase the floor area of both through extensions. Whilst the design and heritage considerations will be discussed in the relevant sections below, first the report establishes the principle.

In terms of EES, Policy E1 aims to secure a successful and inclusive economy in Camden by creating the conditions for economic growth to support residents and local businesses. This is achieved through maintaining premises that are suitable for a variety of businesses, supporting local enterprise and business, promoting Knowledge Quarter as a location and directing new offices to growth areas. This cultural institution is also within the Knowledge Quart and therefore the expansion supports the strength of the area.

Policy C3 (Cultural and leisure facilities) seeks to protect cultural and leisure facilities and manage the impact of adjoining uses on their operation. The policy will resist the loss of these facilities and attempt for them to re-provided in any subsequent scheme. The Council will also seek opportunities for new cultural and leisure facilities and support the

expansion of existing where the impacts on existing infrastructure and amenity is protected.

Because the expansion is relatively small the existing transport infrastructure is not considered to be impacted. The amenity impacts will be discussed in the relevant section but the principle of the expansion of this use in this location is accepted.

Policy H2 of the Local Plan promotes the inclusion of residential development where non-residential development is proposed as part of a mix of uses. The Council will consider the character of development, size of the site, Local Plan priorities and whether or not the proposal serves a public purpose. Payments in lieu for larger developments will be required if housing cannot be provided on site. The proposal maintains the same level of units on site and improves the level of accommodation. Policy H2 would only be triggered if there was an uplift of 200sqm which there wont be as part of this extension and therefore the proposal complies with policy H2.

In terms of policy H3 which aims to protect existing homes and floor space from conversion it states that the Council should resist development that would involve a net loss of residential floor space which also results in the net loss of two or more homes. Because two units are merging to become one larger unit then the net loss is only one unit and, as per paragraph 3.75 of the 2017 Camden Local Plan, this kind of development can help families to deal with overcrowding, to grow without moving home, or to care for an elderly relative. The proposal retains all of the existing residential space at the site whilst providing a new kitchen/dining area, which is welcomed.

2. Design and Heritage

Roof Extension and Terraces

- It is proposed that the buildings be extended at roof level to provide additional space for the Society and the flat, with front terraces across the buildings for office and residential use. The Design & Access Statement states that the existing tenant will return to the property once the building works are complete. Under the proposals the flat will become a self- contained residential unit and will no longer be ancillary to the offices. The existing ground floor windows will be replaced with floor to ceiling glazing and a new lift and central atrium will be introduced to 3 Doughty Mews.
- The addition of a roof extension, if set-back to the point of very limited public visibility, would be acceptable in principle. Whilst limited elevations have been sent over the scale and proportion of the roof extension appears acceptable. However, officers would encourage the applicant to work further on the desing so that it better relates to the proportions and fenestration of the façade below.
- The roof extension would extend along the top of the three buildings and follow the roof line of the development at 1 Doughty Mews which is considered acceptable.
- It is clear that the extension will not be fully visible with the proposal being set back from the front. Any increased size/visibility in this location is unlikely to be considered acceptable in this instance so the building line of the roof extension as proposed is as at the limits of what officers consider can be accommodated.

- All along Doughty Mews there are varied roof forms and unique designs which reinforces the non-uniform character of the mews which is reflected on the roof but also the ground floor development. Whilst persevering the sites character of being three separate buildings is covered more extensively below, this also relates to the roof level and efforts should be made, including expressing party walls, to ensure this is maintained across the building.
- The roof terrace also includes the lift shaft which is expressed externally. Whilst the principle of the lift shaft is acceptable, the amount of glazing and materials used appears slightly contrived. A more solid form and reduction in glazing should be incorporated into this part of the design with any formal submission.
- In terms of the terrace for the society and residential unit, there appears to be sufficient space and there is an acceptance that a terrace in this location would have an adverse impact on the character of the site or Conservation area.
- The addition of PV panels is welcomed and the positioning away from the adjoining listed buildings is considered a positive move. These will have little impact on the character of the Conservation Area, site itself and the adjoining listed buildings

Front Façade Alterations

- As mentioned above, the façade alterations results in ‘cleaning up’ of the three buildings and creates a single building rather than the three different buildings.
- The sense of the site having been three separate buildings needs to be retained in order to respect the historic character of the area’s development, the existing plot-widths and granular nature of the mews. Excessive ‘tidying up’ of the front elevation should be avoided, and the inclusion of the downpipes between former plots is critical to visually breaking up the façade into smaller bays.
- To be clear this is not the only aspect that can demonstrate the three separate buildings and efforts should be made to ensure this character is properly expressed and retained.
- The proposal means that the integrity of the three units is undermined and the strong three bay rhythms would be lost.
- This aspect needs to be celebrated and therefore the proposal should aim to limit the structural alterations as much as possible in order for this character to be reinforced.
- The alterations to the first floor windows appear acceptable as the existing window locations are being retained which is balanced by the more contemporary design of the materials and design of the windows.

Ground Floor Alterations

- The ground floor alterations include removing the lintels and entrance doors and creating a unified approach with multiple floor to ceiling windows and doors.
- The proposed ground floor is very glazed and open in character under the proposals as they stand. Overall there is far too much glazing and the windows are too big. These should not go down to the ground and include stall risers which are a common feature along the mews. The degree of ground floor glazing should be more in line with other ground floor glazing arrangements in the mews.
- Upon undertaking a site visit and subsequent meeting it was clear the reasoning behind this was for ensuring that more light could get into the rooms on the ground floor. However it was agreed that the increase in glazing would not actually significantly increase the light to these rooms anyway due to the width of the mews and proximity to neighbouring buildings.

- There is one front door (with a gauged brick arch) which is of historic appearance. The retention or replication of this arrangement is encouraged as it is one of the few historic features left on the ground floor façade.
- There is an appreciation that the society want to be more present within the area and create a more 'open' headquarters however the proposal needs to be more subtle and 'quieter' as to not disrupt the character of the mews.

Following the original design that was submitted a subsequent site visit was undertaken where the issues in the report were discussed. Following this the agent submitted an addendum design which aimed to consider the points raised. Whilst it is clear the new design has incorporated some of the changes proposed and is moving in the right direction, there still needs to be more work done to the design to ensure the points laid out in this report are fully attended to prior to the submission of a formal planning application.

3. Neighbouring Amenity

Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The factors to consider include visual privacy, outlook; sunlight, daylight, and overshadowing; artificial lighting levels; noise and vibration; odour, fumes, and dust; and impacts of the construction phase, including the use of Construction Management Plans.

In terms of the properties on Doughty Mews, the roof extension is sufficiently set back and means any issues of loss of outlook and enclosure or daylight/sunlight are not considered significant. The terrace at roof level does extend along the three buildings however there are plenty of roof terraces along Doughty Mews and there is a common terrace character. As such, there is already a degree of mutual overlooking between properties and the introduction of the proposed terrace will not adversely impact the amenity of neighbouring residents.

In terms of the rear gardens of Doughty Street, the rear windows of the site are not changing and it was confirmed that there will be no rear windows on the roof extension just roof lights so any issues of privacy or overlooking is mitigated. For outlook and increased sense of enclosure the roof extension is sufficiently set away as not to significantly impact on the residents along Doughty Street. Using GIS, it also appears that the proposal passes the 25 degree rule which means the impacts to daylight/sunlight are not considered significant. Whilst, with the limited plans provided it appears to suggest that the impacts to neighbours amenities along Doughty Street are not significant, any full application should fully demonstrate the mitigation.

4. Transport

In line with Policy T1 of the adopted Camden Local Plan, we expect cycle parking at developments to be provided in accordance with the standards set out in the London Plan. The submitted plans show that 2 cycle spaces would be provided for the 2 bedroom residential unit within the ground floor entrance area. For the office use, it is indicated that 3 stands (6 spaces) would be provided on-street outside 3 Doughty Mews. However, given the narrow nature of the mews, the lack of clear footway provision and the large amount of vegetation that residents have provided on both sides of the mews it is unclear whether this cycle parking can be safely accommodated. In such circumstances it may be appropriate to seek a Section 106 contribution towards the provision of the cycle stands elsewhere within the vicinity of the site. The cost of providing 3 M-shaped stands is (£255 x 3 =) £765. Because the proposal also includes the cycle parking on Camden Council land then a separate s278 Highways legal agreement may have to be agreed in order for these to be provided

In accordance with Policy T2 of the adopted Camden Local Plan, the residential unit should be secured as on-street Resident parking permit (car) free by means of a Section 106 Agreement. The S106 Agreement should be worded such that the existing tenant retains their existing parking rights for as long as they remain at the flat, but these cease to exist once they leave and the property reverts to being fully car free. No off-street parking is currently provided and none is proposed. There are single yellow lines on both sides of Doughty Mews which prevent waiting between the hours of 8.30am and 6.30pm Monday to Saturday, with parking allowed outside these hours.

Given the mews location, the quiet residential nature of the mews and the amount of construction and improvement works proposed, it is recommended that any future planning application be subject to a Construction Management Plan and associated Implementation Support Contribution of £3,920 and Impact Bond of £7,500 to be secured by means of the Section 106 Agreement. This will help ensure that the proposed development is carried out without unduly impacting on neighbouring amenity or the operation of the local highway network.

A highways contribution is not considered necessary for this development as any damage that occurs to the adjacent carriageway will be covered by the scaffolding bond that is secured as part of the scaffold licensing process.

5. Energy and Sustainability

The Council requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Policy CC1 requires all development to reduce carbon dioxide emissions by following the steps in the energy hierarchy; supports and encourages sensitive energy efficiency improvements to existing buildings; and expects all developments to optimise resource efficiency.

Policy CC2 requires all development to adopt appropriate climate change adaptation measures such as:

- A. the protection of existing green spaces and promoting new appropriate green infrastructure.
- B. not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- C. incorporating bio-diverse roofs, combination green and blue roofs, and green walls where appropriate; and
- D. measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

Within the pre-app document details of energy or sustainability measures have been provided. Passive design measures to maximise natural light and ventilation, sustainable natural building components and renewable energy sources have been proposed which are all welcome.

Passive ventilation will be secured through a high quality highly insulated envelope and renewable energy sources in the form of mechanical ventilation heat recovery system (MVHR) and air source heat pumps (ASHPs) will be included. This is welcome and is a key complement to the project and therefore should be included within any full application. The sustainable construction materials can be secured through an s106 agreement to ensure delivery.

CONCLUSION

Overall the the principle of the proposed roof extension, terrace and some sympathetic front façade alterations is considered acceptable. However, the current proposal includes too many changes, especially on the ground floor which would cause harm the character and appearance of the mews buildings. These changes should be refined/removed in line with the advice above, prior to the submission of a formal planning application.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable, nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by putting up a notice on or near the site. We would also place an advertisement in the local press. The Council must allow 21 days from the consultation start date for responses to be received. We recommend that you conduct an early consultation to ensure neighbours are aware of the proposal.

If you have any queries about the above letter or the attached document, please do not hesitate to contact **Ewan Campbell**

Thank you for using Camden's pre-application advice service.

<p>It is important to us to find out what our customers think about the service we provide. To help us in this respect, we would be very grateful if you could take a few moments to complete our online survey at the following website address: www.camden.gov.uk/dmfeedback. We will use the information you give us to help improve our services.</p>
