

Delegated Report		Analysis sheet	Expiry Date:	23/03/2022
		N/A	Consultation Expiry Date:	01/05/2022
Officer			Application Number(s)	
Alex Kresovic			2022/0309/P	
Application Address			Drawing Numbers	
20 Bloomsbury Street, London, WC1B 3QA			<i>See draft decision notice</i>	
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature	
Proposal(s)				
Erection of a mansard roof extension with 3 x dormer windows, to extend top floor flat.				
Recommendation(s):		Refuse Planning Permission		
Application Type:		Full Planning Permission		

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice			
Informatives:				
Consultations				
Adjoining Occupiers:	No. of responses	0	No. of objections	0
Summary of consultation responses:	<p>Site Notices: displayed 25/03/2022, expired 18/04/2022. Press Notice: published 07/04/2022, expired 01/05/2022.</p> <p>No responses were received from neighbours or members of the public.</p>			
Bloomsbury CAAC	<p>A letter of objection was received on behalf of the Bloomsbury CAAC. Their objection comments can be summarised as follows:</p> <ul style="list-style-type: none"> - Previously objected to the previous iteration of the application (2020/3591/P). - Great Russell Street is charactered by flat roofs and the proposal would harm the roof scene in its current form. - Bloomsbury Conservation Area Appraisal, Nos. 39-42 and 35-38 have strong horizontal banding and consistency in height that gives a very distinctive and consistent mid-19th century character. The mansard extension would break this consistency and would be detrimental to this prominent corner of the Bloomsbury CA. - The mansard storey would be harmful to the nearby terrace of Grade II listed Georgian townhouses at 24-60 Bloomsbury Street and 89-91 Great Russell Street, opposite, and the setting of the Grade I listed British Museum. - The roof development would be entirely counter to the established streetscape of this part of Bloomsbury Street and Great Russell Street. 			

Site Description

The site comprises a four storey building located on the junction of Bloomsbury Street and Great Russell Street. The property forms part of a terrace of buildings of similar height that are typically in commercial use on the ground floors, with residential or office use located on the upper floors.

The current use of the building is a bureau de change on the ground floor, with the first and second floors in office use. The third floor was converted to a two-bedroom flat under planning reference 2013/4691/P. The first floor office is accessed via a secondary doorway on Great Russell Street, while the 2nd floor offices and 3rd floor flat share a stair core, accessed from Bloomsbury Street, independent of the ground floor shop unit.

The site is not listed but lies within the Bloomsbury Conservation Area. No.22 Bloomsbury Street, located on the opposite side of Bloomsbury Street, is noted in the Bloomsbury Conservation Area Appraisal and Management Strategy (BCAAMS).

There are nearby listed buildings at 89 - 91 Great Russell Street, a terrace of three houses immediately north of the application site which are Grade II listed and also 98 - 103 Great Russell Street to the north west of the site are Grade II*/Grade II listed.

Relevant History

APPLICATION SITE:

2020/3591/P - Erection of a mansard roof extension with 4 x dormer windows, to extend top floor flat – Refused 22/10/2021.

2015/1631/P – Erection of roof extension to create new 4th floor level and 1x residential unit with balcony. Replacement windows and installation of railings to front – Refused 18/02/2016.

2013/4691/P – Change of use from office (Class B1) to residential (Class C3) comprising 1x 2 - Bedrooms flat at third floor level - Granted subject to a S106 legal agreement on 02/10/2013.

Relevant policies

National Planning Policy Framework (2023)

London Plan 2021

Camden Local Plan 2017

G1 (Delivery and location of growth)

A1 (Managing the impact of development)

A4 (Noise and Vibration)

D1 (Design)

D2 (Heritage)

T1 (Prioritising walking, cycling and public transport)

T2 (Parking and car-free development)

T3 Transport infrastructure)

T4 (Sustainable movement of goods and materials)

CC4 (Air Quality)

DM1 (Delivery and monitoring)

Camden Planning Guidance

CPG Developer Contributions 2019

CPG Housing 2021

CPG Design 2021

CPG Amenity 2021

CPG Transport 2021

Bloomsbury Conservation Appraisal and Management Strategy adopted 18 April 2011

Assessment

1. Site, setting and townscape

1.1. The applicant seeks planning permission for: *Erection of a mansard roof extension with 3 x dormer windows, to extend top floor flat.*

1.2. The application site is 20 Bloomsbury Street. Bloomsbury Street itself is a relatively wide and busy south-bound one-way street. The site is located at the point where Bloomsbury Street and Great Russell Street intersect. Great Russell Street is also a relatively busy east-west route.

1.3. 20 Bloomsbury Street / 35 Great Russell Street is a 4 storey 19th century terraced building which occupies the pivotal corner plot on the SE corner of the junction of Bloomsbury Street

and Great Russell Street. Many of the buildings that still populate Great Russell St and Bloomsbury Street are mid to late 19th century construction. The south side of Great Russell Street, east of the junction with Bloomsbury St, is predominantly fronted by four-storey buildings with consistent heights and parapet lines.

- 1.4. On the NE corner of the same junction (22 Bloomsbury Street / 92-93 Great Russell Street) is a 4 storey 19th century classically inspired brick building. Numbers 20 and 22 Bloomsbury Street, which stand on either side of the Great Russell St junction, have similar height and massing and similarities in disposition of window proportions. They are prominent and in the streetscene, appearing as a quasi-pair of matched sentinels when looking east along Great Russell St.
- 1.5. The Kenilworth Hotel, the Ivanhoe Hotel (on the west side of Bloomsbury St) and 14-18 Bloomsbury St (on the east side) are early 20th century construction. They are both younger and taller (6 storeys) than the application site and constructed from red brick in a more muscular style with stone string course detailing. The terraced buildings on the south side of Great Russell St are of a similar date of construction to 20 Bloomsbury Street and are all without mansard roofs. The application site building is more associated in form and style with its older and contemporary neighbours than with the later buildings with more exuberant roofscapes.
- 1.6. There are several listed buildings around the site. Further south of the site, the corner property at the junction with Streatham Street, is 10 Bloomsbury Street which is Grade II listed. Further along east on the northern side of Great Russell Street is the British Museum which is partially Grade I and partially Grade II listed and a significant heritage asset in the borough. In addition to this, directly opposite the application site, on the northern side of Great Russell Street at the junction with Bloomsbury Street is a group of three Grade II listed terraces dating from the late 18th to early 19th centuries. These properties have three principal storeys and are three bays wide.
- 1.7. To the south of the site, the adjacent property is described in the Conservation Area statement as a five-storey late 20th century redevelopment with “clumsy detailing”, nevertheless even this still reflects the architectural treatment of the Edwardian hotel building opposite with its red brick and gables and thus is still in keeping with the character of the area.

2. Policy background & Principle of roof extension

- 2.1. The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”). Section 72(1) of the Act requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area.
- 2.2. Paragraph 5.26 (ii) of the Bloomsbury Conservation Area Appraisal and Management Strategy (BCAAMS) notes that there is pressure for redevelopment across Bloomsbury and that roof extensions form part of the range of small scale change that can, cumulatively, have a significant impact on the character of the Conservation Area. This demonstrates that care must be taken in assessing proposals for roof extensions to prevent significant negative impact on the character of the Conservation Area. Paragraph 5.27 of the Strategy re-iterates the requirement for development proposals to preserve or enhance the character or appearance of the Bloomsbury Conservation Area. It highlights that this requirement also applies to developments which would affect the setting of the Conservation Area or views into or out of the area.
- 2.3. The BCAAMS notes in para 5.4 that “Alterations and extensions can have a detrimental impact

either cumulatively or individually on the character and appearance of the area. Examples within the area include: Inappropriate roof level extensions - particularly where these interrupt the consistency of a uniform terrace or the prevailing scale and character of a block, are overly prominent in the street". Para 5.38 makes it clear that "The Conservation Area retains many diverse historic rooflines which it is important to preserve". The relevant underlying emphasis of the Strategy is on protection of characteristic and historic roofscapes.

2.4. The application site forms a prominent corner property within a wider terrace of four storey properties which runs from Bloomsbury Street into Great Russell Street, with a consistent parapet line and which retains its original roof arrangement. Adopted policy guidance in CPG Design outlines that where terraces or properties have remained untouched, roof alterations are unlikely to be considered appropriate. It is considered that the application site sits more characteristically with the four-storey properties that continue along Great Russell Street than with the buildings immediately south along Bloomsbury Street. The building contributes to the strong character of this part of the conservation area, contributing to its significance. The additional storey proposed for the host property would be out of character with the immediate surrounding context. The proposal would place inappropriate bulk and emphasis on this corner of Bloomsbury Street and Great Russell Street and would undermine the balanced composition of the facing buildings, numbers 20, and 22 Bloomsbury Street. The addition of the roof extension would also be at odds with the prevailing characteristics of the roofscape along this part of Great Russell Street, harming the historical significance of the area. The development would cause less than substantial harm to the character and appearance of the conservation area, contrary to local plan policy D2.

2.5. Although the site is located in close proximity to listed buildings to the north and east, it is considered that the site is sufficiently distinct from the listed buildings that the proposals would not harm the setting of the designated heritage assets, and so would not harm their significance.

2.6. In summary, the construction of a highly visible roof extension at this prominent corner site would have a detrimental impact on the characteristic roofscape and townscape of this part of the Conservation Area and is inappropriate in principle.

3. Design and materials

3.1. The design of the proposal is more conventional than the development, which was refused in 2015, and responds more positively to Camden Planning Guidance on Design. However, is not vastly different to the proposal which was refused in 2021. The proposed dormers appear to clutter the eaves line of the building. The two dormers that front onto Bloomsbury Street sit behind the central arch detail within the cornice. This makes the roof appear crowded. The dormer windows also fail to line through with the windows on the façade below. Similarly, the single dormer window onto Gt Russell St also fails to line through with the windows below and the proposal fails to comply with local plan policy D1.

4. Transport

4.1 The development proposes the extension to an existing flat which is the subject of a section 106 legal agreement obligation for use as a car-free home. This restriction remains in perpetuity and therefore an extension to the size of the flat does not give rise to further transport obligations in respect of parking.

4.2 The site is in Camden's Central London Cumulative Impact Area for considering the effects of construction. The Council's requirements for Construction Management Plans (CMP) includes specific guidance and requirements for development within the Central London Area, in order

to mitigate the harmful impacts of the interaction of high levels of construction and construction traffic with established business/residential travel patterns. The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network and due to the location of cycle and pedestrian routes adjacent to the site. A Construction Management Plan (CMP) would therefore be required as part of any planning permission, with a specific requirement to address the considerations raised by the Central London cumulative guidance. The council's CMP pro-forma, which is required to be used as the template for CMPs, also includes measures to ensure that nuisance from dust, noise and other activities are minimised.

4.3 In the event that the development was acceptable, the CMP would be secured by a head of term to the s106 legal agreement. The CMP would need to take account of the potential cumulative impacts on the local highway network arising from other developments which are ongoing or planned in the locality. Once a contractor is retained engagement would be required on the draft CMP with residents/businesses, Members and officers.

4.4 A CMP Implementation Support Contribution will be required in order to fund the specific technical inputs and sign off that are required to ensure that the obligation is complied with, and the planning objectives achieved. The support contribution is therefore £3,920 and would be secured by s106 legal agreement.

4.5 Construction activity can cause disruption to daily activities, however a well-run site that responds to the concerns of residents can greatly improve the situation. While most sites deal quickly and robustly with complaints from residents and reinforce the requirements of the CMP with site operatives, there can be situations where this does not occur and officers in the Council are required to take action. Due to the scale of the development, duration of works and sensitive location of the site, a bond of £7,500, in accordance with the Council's published note on Construction Impact Bonds, would be secured as a head of term in a s106 legal agreement. The bond would be fully refundable on completion of works, with a charge only being taken where contractors fail to take reasonable actions to remediate issues upon notice by the Council.

4.6 There is no requirement to secure a highways re-instatement contribution for this development, as any damage that occurs to the surrounding footway due to the placing of scaffolding will be covered by the bond that is secured as part of the scaffolding licence process.

4.7 A s106 legal agreement is required in order to secure the three matters above. In the absence of such an agreement, the development would be likely to harm local amenity and the safe movement of pedestrians, cyclists and other road users. In the absence of a legal agreement to secure a construction management plan, construction impact bond and a financial contribution for construction management plan monitoring, the development would be likely to give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), T3 (Transport Infrastructure), T4 (Sustainable movement of goods and materials), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.

5. Other matters

5.1 The enlargement of the 2-bedroom flat by 40sqm to a 3-bed flat of c.104sqm would create generously sized accommodation which exceeds the nationally described space standards, with acceptable floor to ceiling heights. The provision of a 3-bed flat would be acceptable in this context.

5.2 The additional height would have no significant impact on daylight to habitable rooms in nearby residential properties, due to the separation distances and site orientation. The new dormer windows would not introduce new opportunities for overlooking of existing sensitive windows, other than across the adjacent streets, which is considered to be an acceptable separation distance. The proposals are acceptable in terms of policy A1.

6. Conclusion

6.1. Paragraph 202 of the NPPF sets out 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.' The development would lead to less than substantial harm to the Bloomsbury Conservation Area. The proposal would not provide sufficient public benefits (which include the enlargement of the existing flat) to outweigh the presumption against harm to the designated heritage asset, and therefore the application is refused.