

# Design & Access, Planning and Heritage Statement

2nd Floor Unit

168 North Gower Street  
London, NW1 2ND

ZRP087\_02\_Design and Access, Planning and Heritage Statement\_2F

November 2023

ZRP Architects

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## 1.0 Introduction

## 1.1 Introduction

### *1.1 Introduction*

This Design & Access, Planning and Heritage Statement has been prepared in support of an application for planning permission and Listed Building Consent at 168 North Gower Street. The submission seeks consent for a small extension at second floor level to provide improved internal occupation and increased residential accommodation within the existing HMO unit.

### *1.2 Brief*

The applicant's brief was to improve the thermal performance of the building while maximising its rental yield so as to make the property more commercially viable and secure its future use as a house of multiple occupation.

- ZRP Architects 2022

### *1.3 The Project Team*

Client	Marlah Investments Inc
Architecture	ZRP Architects

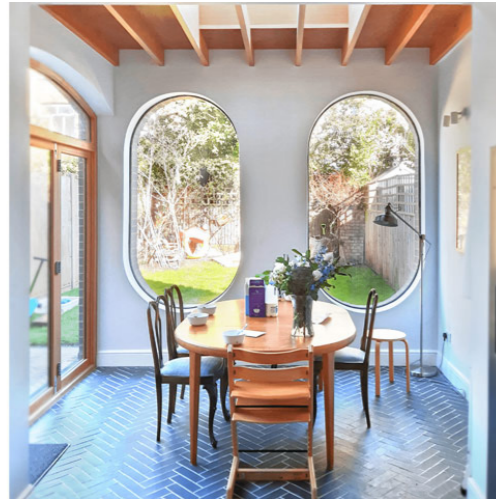
## 1.4 ZRP Architects

ZRP are a creative and enthusiastic studio of Architects, Designers and Construction Consultants based in Clerkenwell, London, established over 10 years ago.

Our developing portfolio of work ranges from contemporary new build projects, sensitive listed buildings, international design competitions, rural masterplans and refurbishments across differing scales, typologies and sectors.

We are experienced with working at a range of scales and budgets both in the private and public sector.

The work of the practice is underpinned by a strong conviction in both the creative and technical design process. A defining influence on the evolution of our architectural language results in designs which are uniquely tailored to the context within which they sit.



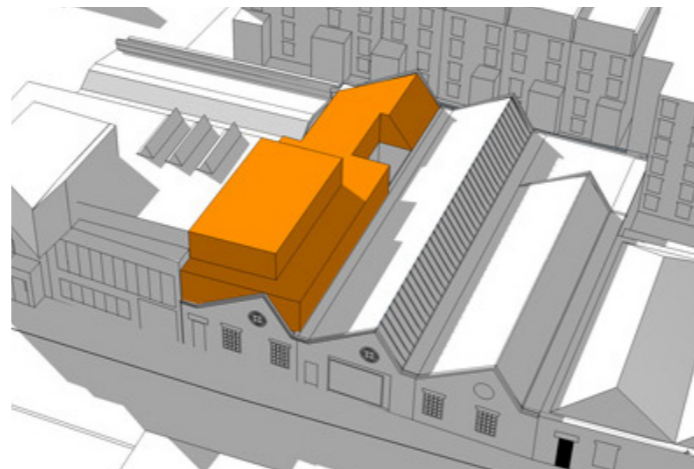
Northolme Road, Highbury

This project comprised a full remodel, refurbishment & extension of a four storey Victorian Townhouse, situated in the in Sotheby Conservation Area, one of Islington's 41 specially protected neighbourhoods. As well as reconfiguring all floors of the property, the external side return was incorporated into the rear of the ground floor and a further extension was added to the back of the property at this level. Furthermore, the existing lower ground floor was extended to increase the space and provide a better connection to the main house.



Chart House, Shoreditch

Conversion and change of use of an existing lock-up garage in Shoreditch, London to provide a one bed-room house over two floors, as a pied-a-terre for a young professional working in the City. The existing brick garage was built within the end garden of an early Georgian terrace and a Grade II Listed former almshouse, stands opposite. The design respects the existing building, maintaining as much of its fabric as possible.



Warehouse Conversion

ZRP are appointed to explore options for the conversion and extension of a warehouse in east London. The project seeks to incorporate an additional 2900sqft of residential accommodation within and over an existing studio unit, as well as the creation of a new basement, which retains the existing employment floor space.



St Nicholas Cole Abbey / Grade I Listed Building

Conversion of the redundant church to create a new National Centre for Religious Education with all principle accommodation provided within a new two storey polished plaster and glass box to the centre of the nave. Ancillary accommodation was situated in the converted west end over three floors and a new restaurant to be created within a new plinth extension to the south, forming a public terrace over.

## 2.0 Site & Context



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168 North Gower Street

## 2.1 Site

### Site Location

The site is located on North Gower Street, just north of Euston Road and Euston Square. The site features an early 19th century, Grade II Listed Georgian townhouse with later additions, spread over 6 storeys including basement and mansard (now split into 5 HMO flats).

### Links and transport routes

The site is highly accessible by public transport. The site is a short walk from Euston Square Underground Station to the south, as well as London Euston around 4 minutes to its east. Warren Street Station is also a short walk to the west. North Gower Street has a mix of pay and display and permit holder parking. There is also a multi-storey carpark at the end of the street. By virtue of its central location, there are also numerous bus routes covering swathes of London.

### Ownership

The site is owned by the applicant, Marlah Investments Inc.

### Access

The site is easily accessible. It does not have steps to the threshold as typically found on a Georgian townhouse. There is one small step at the front entrance door and the rest of the building is accessed via a main circulation stair.

Left

Aerial view of the site and surrounding area

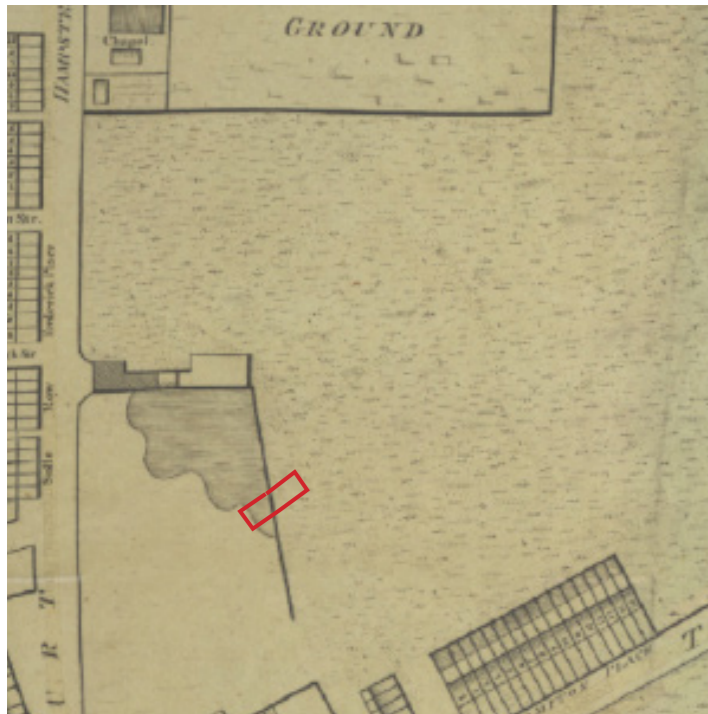
## 2.1 Site

### Historic Contextual Development

As illustrated by the maps below at the turn of the 19th century North Gower Street was undeveloped, lying just south of a burial ground which is identified as St James' Chapel Ground by 1828. At the same time, the terrace, including 168 North Gower Street, is visible.

The development of Euston Road leads to fairly rapid densification of the area, and by 1870 the urban form of the area is tangibly the same cramped urban form as now. North Gower Street was previously named George Street, which combined with Gower Street in the early 20th century.

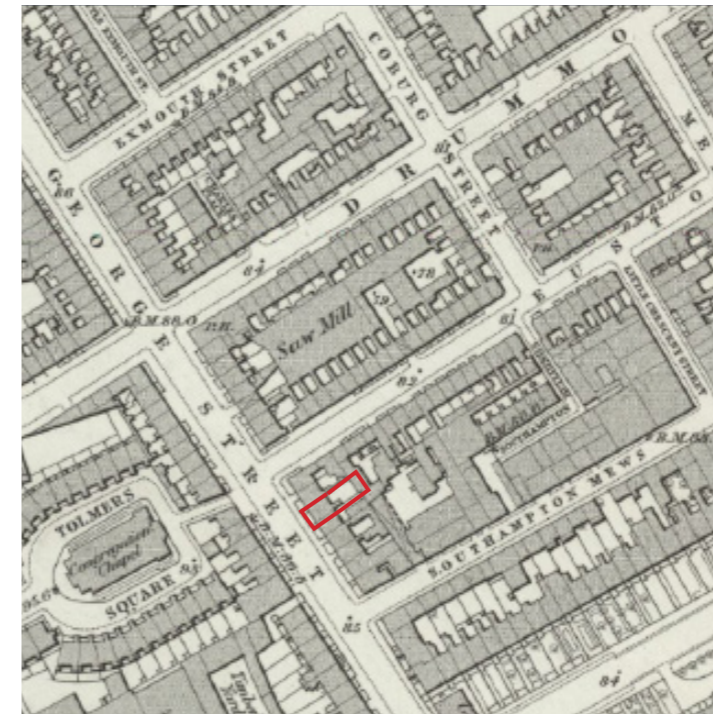
Notably, in the early 40s the application site was fully built up, whilst some areas on Euston Road were being extensively redeveloped following WWII.



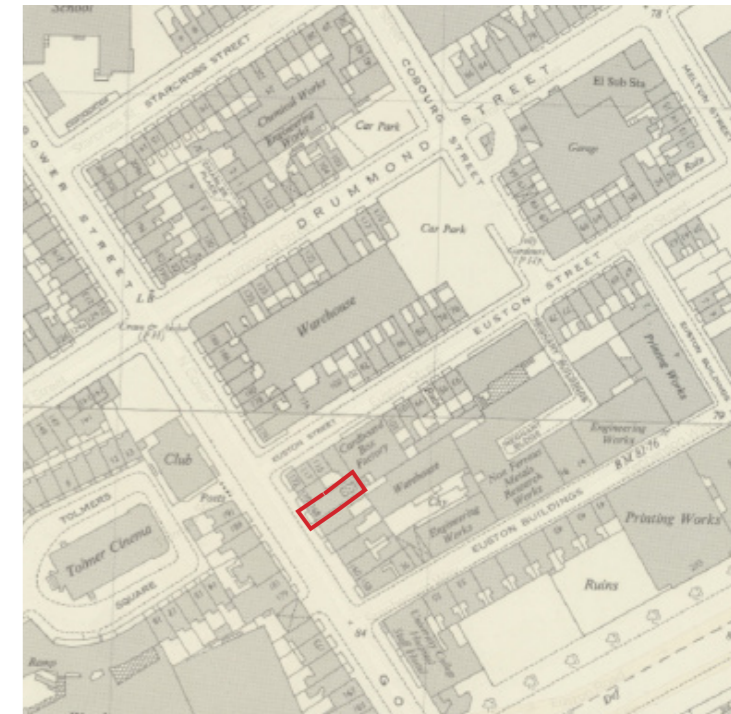
R. Horwood Engraving of London (1799)



Map of London made from an actual survey in the years 1824, 1825 and 1826 dedicated to King William IV. C. and J. Greenwood (1828)



London (First Editions c1850s) XXV  
Surveyed: 1870, Published: 1876



OS Maps (1940s-1960s)



## 2.1 Site

### Physical description & Listed Status

The site sits within a terrace of similarly scaled buildings which are typical of the area. Nos 168 and 170 are both Grade II listed. The listing text states:

*2 terraced houses. Early C19. Yellow stock brick with channelled stucco ground floors. No.170 with later slated mansard roof. 4 storeys and basements. 2 windows each. Round-arched ground floor openings: entrances with fanlights and panelled doors; No.170 ground floor window with margin glazing and intersecting tracery. Upper floors with gauged brick flat arches to recessed sashes, except 1st floor of No.168 with casements. Both with cast-iron balconies at 1st floor level. Parapets. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings to areas.*

Structures book-ending these two listed buildings are neo-Georgian and are somewhat pastiche. Those opposite the building are also listed and are similar in appearance. Buildings in the same block as the site generally have the same number of storeys but vary in scale, with those on Stephenson Way being notably taller.

There is a terracing from Euston Road, which has commercial buildings nearby of around 8-10 storeys. Opposite N Gower Street is University College Hospital which is considerably taller. Blocks to the north of the site become more modest in scale, although there is a character of intense development in the locality.

The building is not within a Conservation Area.

Works to extend and internally remodel the ground and first floor units was approved in May 2023, as set out later in this document.

### Interiors

As can be seen on the following page, the plan form of the existing house has been substantially altered in the past. The interior of the property was not inspected when it was listed. It is not of particular significance and few historic features remain. This is important when assessing the benefit or possible perceived harm of the scheme.



— Site boundary

Above  
View of existing building from  
N Gower Street



## 2.1 Heritage & Significance

To the rear of the property, the 'main elevation' and outrigger are formed of a stock brick. They appear to have been altered as they have proprietary concrete cills and modern lintels over the windows, which themselves are non-original. The roof mansard is fairly traditional in its construction with slate roof and lead dormers.

Lower storey extensions are fairly plain, featuring a rendered rear wall which contributes little to the building. The terrace is somewhat cluttered with a timber fence acting as guarding.

The 4th floor is a modern, mansarded addition and the basements and ground floor have been extended, with the property being used for commercial purposes in part before being split into 5 separated residential units. The basement extensions are not original and it appears that further alterations have been undertaken to the rear elevation with modern Catnic-type lintels and non-original windows being evident.

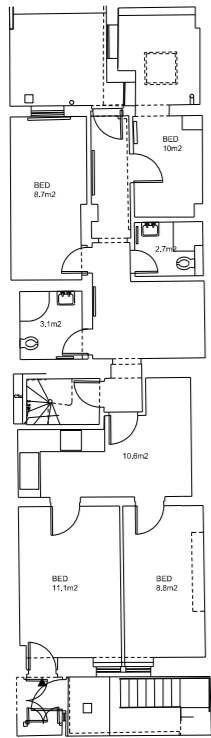
The existing building's interior is not included in the listing text but it is clear that historic alterations have eradicated most original features. The stairwell incorporates a modern balustrade and has been renewed in full in parts (noting planning history shows 'reinstatement of ground to first floor stair in 2002'), doors have been replaced and there is little original cornicing, no fire places and minimal original skirting, etc.

The current quality of both the interior and indeed rear elevation are low, and these aspects contribute to the site's low significance in terms of architectural quality. The front elevation is of low-medium significance though it contributes to the character of the street.

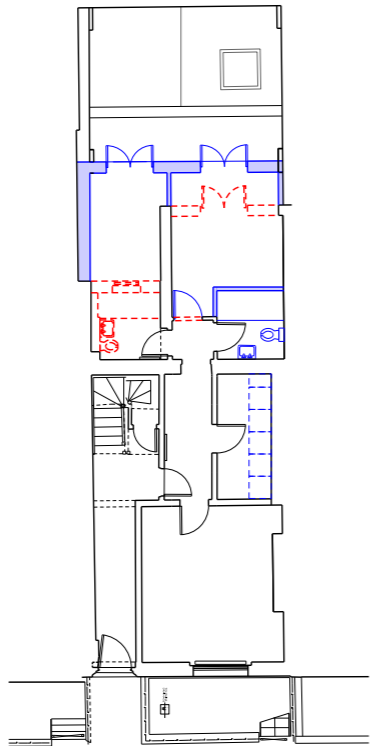
2.2 Existing Building

Floor	Unit	GIA (sq.m)
LGF	4 bed	76
GF*	3 bed	53
1*	3 bed	53
2	3 bed	44
3	4 bed	73 (40)
4	inc.	(33)
Communal	-	17
<b>TOTAL</b>		<b>316sq.m</b>

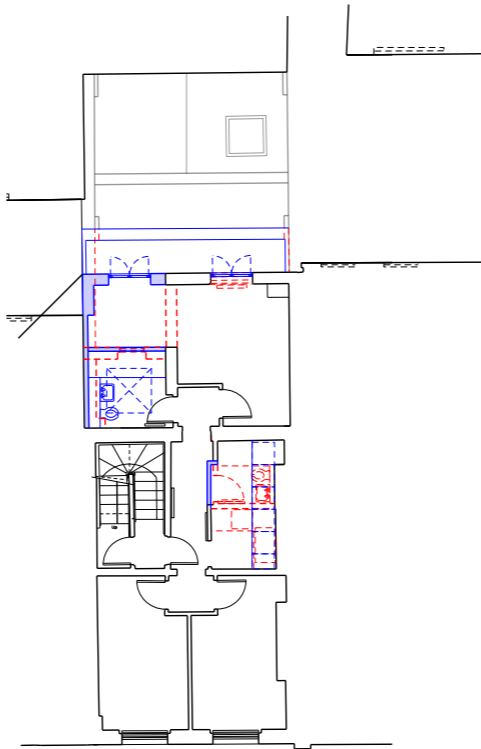
\*Including additional works as approved in recent applications (ref: 2022/5410/P & 2023/0668/L)



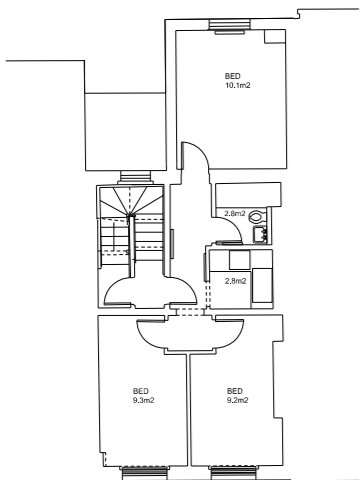
Basement Plan



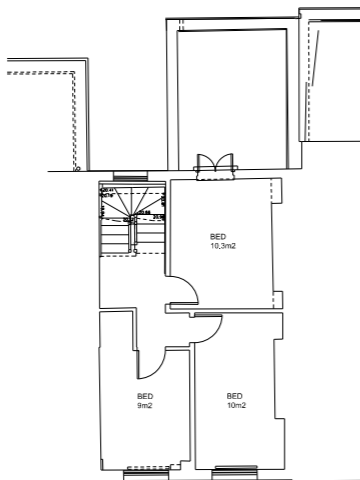
Ground Floor Plan



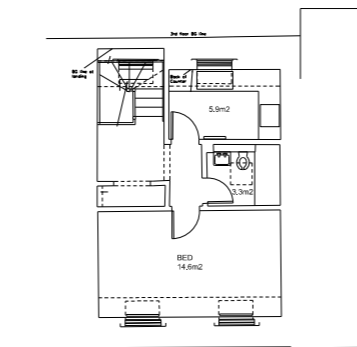
First Floor Plan



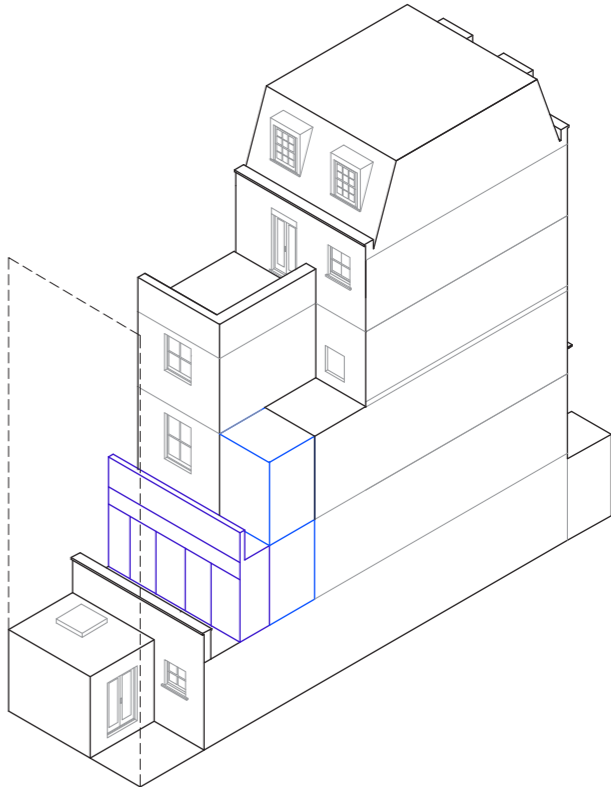
Second Floor Plan



Third Floor Plan



Fourth Floor Plan



Left  
Floor plans - as existing

Above  
Isometric diagram of existing configuration including works approved in May 2023 and as noted above shown in blue.

## 2.3 Planning History

Application Number	Development Description	Date Registered	Decision
2022/5410/P / 2023/0668/L	Erection of a ground floor rear extension with roof terrace above, erection of a first floor rear infill extension and various minor internal alterations.	31-05-2023	Grant Full Planning Permission & LB Consent (conds)
LSX0205002	Submission of details of repair of metalwork, in-situ repair of the existing staircase, dry rot remedial repairs, reinstatement of the ground floor to first floor flights of the original staircase and the in-situ repair of the remaining flights, repair of cantilevered stone balcony to the front floor elevation, pursuant to additional condition 39 (c,e,i,k and l) of the Listed Building Consent dated 22nd November 2000, Ref. LS9804018/R2, as shown by; Planning Report dated 8th May 2002 Ref. Listed Building Consent LS9804018/R2 Condition 3 (c,e,i,k,l).	16-08-2002	Grant Approval of Details (Listed Bldg)
PSX0204367	Erection of a mansard roof extension, as shown on drawing numbers; 185/00; 321/A/60; 71; C/80; D/81; A/82; A/83 Planning Report; and Pages A-E photographs.	22-07-2002	Grant Full Planning Permission (conds)
LSX0204368	Erection of a mansard roof extension, as shown on drawing numbers; 185/00; 321/A/60; 71; C/80; D/81; A/82; A/83 Planning Report; and Pages A-E photographs.	22-07-2002	Grant L B Consent with Conditions
LSX0104759	Submission of details pursuant to Condition 3 (h) of Listed Building Consent LS9804018/R2 dated 22/11/2000, as shown on drawing numbers; 185/00, 122.36/A'A; C; 1; 2; 10A; 11A.	06-07-2001	Grant Approval of Details (Listed Bldg)
LSX0104590	Structural Repair and Underpinning, as shown on drawing numbers; 122.36/T1; T2; 12A; 13A; 14A; 15; 16; 17; 18A; 19A; 20; 21; 22A; 23; 24; 25; 26; and 185/ 00.	31-05-2001	Grant L B Consent with Conditions
LSX0004362	Partial submission of details in respect of bricks and pointing, upgrading of partitions and floors for fire and sound proofing purposes, internal joinery pursuant to additional condition 3(a) (b) (f) (g) of the Listed Building Consent (LS9804018R2) dated 22 November 2000, as shown from the repair specification dated 16/3/99, job reference 185 section 9, brickwork conservation, pages 1-3 with the exception of clauses 2.2, 2.3 and 2.4, pages 9-12 in respect of lime based mortars only, section 12.A, restoration to carpentry work, p 3, section 16.A, conservation joinery, page 1 with the exception of clause 022, section 18.2.A, plaster repair, pages 1-7, drawings 18 5/20, 21, 50, 51, 52, 53, 54, 26 and 27.	06-06-2000	Grant Approval of Details (Listed Bldg)
PS9804017R2 / LS9804018R2	Change of use, extension and works of conversion for use as four self contained flats together with a full width rear extension at basement level and a half width rear extension on ground, 1st and 2nd floor levels, as shown on drawing numbers: 185/00, 01, 02, 03, 04A, 05, 11A, 12A, 13A, 14B, 15C and 122.36/12 together with structural engineer's report and repair specification.	24-12-1998	Grant Permission subject to Section 106
PS9804017R1 / PS9804017R1	Provision of 3 (2-bed) and 1 (3-bed) flats, involving extension to rear at first and second floors and modification of existing rear extension. (REVISED PLANS SUBMITTED)	8/27/1998	Withdrawn Application-revision received
PS9804017 / LS9804018	Provision of 3 (2-bed) and 1 (3-bed) flats, involving extension to rear at first and second floors and modification of existing rear extension. (REVISED PLANS SUBMITTED)	8/27/1998	Withdrawn Application-revision received
9470037R2	Alterations and extension to provide four studio flats and a two bedroom flat, as shown on drawings Numbers 114/16, 17, 18 & 19.	12/13/1995	Grant L B Consent with Conditions
9400202R2	Alterations and extension to provide four studio flats and a two bedroomed flat, as shown on drawing Numbers 114/16, 17, 18 & 19.	12/11/1995	Grant Full Planning Permission
9470037	Alterations and extension to provide offices (169sm) and three flats (REVISED PLANS SUBMITTED).	2/10/1994	Withdrawn Application-revision received
9400202	Alterations and extension to provide offices (169sm) and three flats (REVISED PLANS SUBMITTED).	10-02-1994	Withdrawn Application-revision received
9150013	To use the whole building for office purposes within Class B1 of the Town & Country Planning Act (Use Classes) Order 1987	03-12-1991	S64 Det. - Const.Dev.-Applic. required
9000027	Redevelopment of existing building by the erection of a basement ground and four upper storeys building to be used for small office suites as shown on drawings numbered 5217(0-)08 10A 12A 14 and existing 44/148/1 and 2.	05-01-1990	Refuse Full or Outline Permission
37402	The use of the second floor of 168 North Gower Street, NW1 for workshop accommodation (bookbinding).	19-12-1983	Permission

Full Town Planning and Listed Building Consent was approved by LB Camden earlier this year, in May 2023, to extend and improve the existing Ground and First Floor HMO units. These works were concentrated to the rear of the property and provided additional bedroom, kitchen and bathroom accommodation, as well as enabling improvements to the thermal insulation of the building fabric and replacement windows and external doors along with other incidental remedial works and enhancements. These works have not yet been carried out as the applicant is waiting for current short lease tenancies to expire and the units to be vacated but will be completed in 2024.

Prior to this, this site has a fairly extensive planning history. The majority of works relate to a mansard extension which would appear to have been implemented around 2003 to provide a new 4th floor.

Separately, it is clear that much work has been undertaken to the property, even only since 1983 when the first record is listed. It is unclear what works were done to the property within the 150 years or so which preceded this.

Over and above the approved works to extend and improve the ground and first floors in May of 2023 and which are yet to be completed, works of note which have been approved and undertaken at the property within the last 40 years include the following:

- 1983: 2nd floor converted to workshop
- 1995: property split into 5 flats
- 2000: walls, floors and partitions upgraded for fire and sound separation
- 2001: structural repairs and underpinning
- 2002: 4th storey mansard roof extension added
- 2002: reinstatement of the ground to first floor flights of the original staircase and other extensive repair work to interior, exterior and structural elements

The extent of these works demonstrate how the integrity of the original building has been largely compromised and contribute to a significant reduction in its heritage value beyond the main front elevation which remains largely in tact to third floor level.

Left

Planning history extract from Camden's Planning Portal

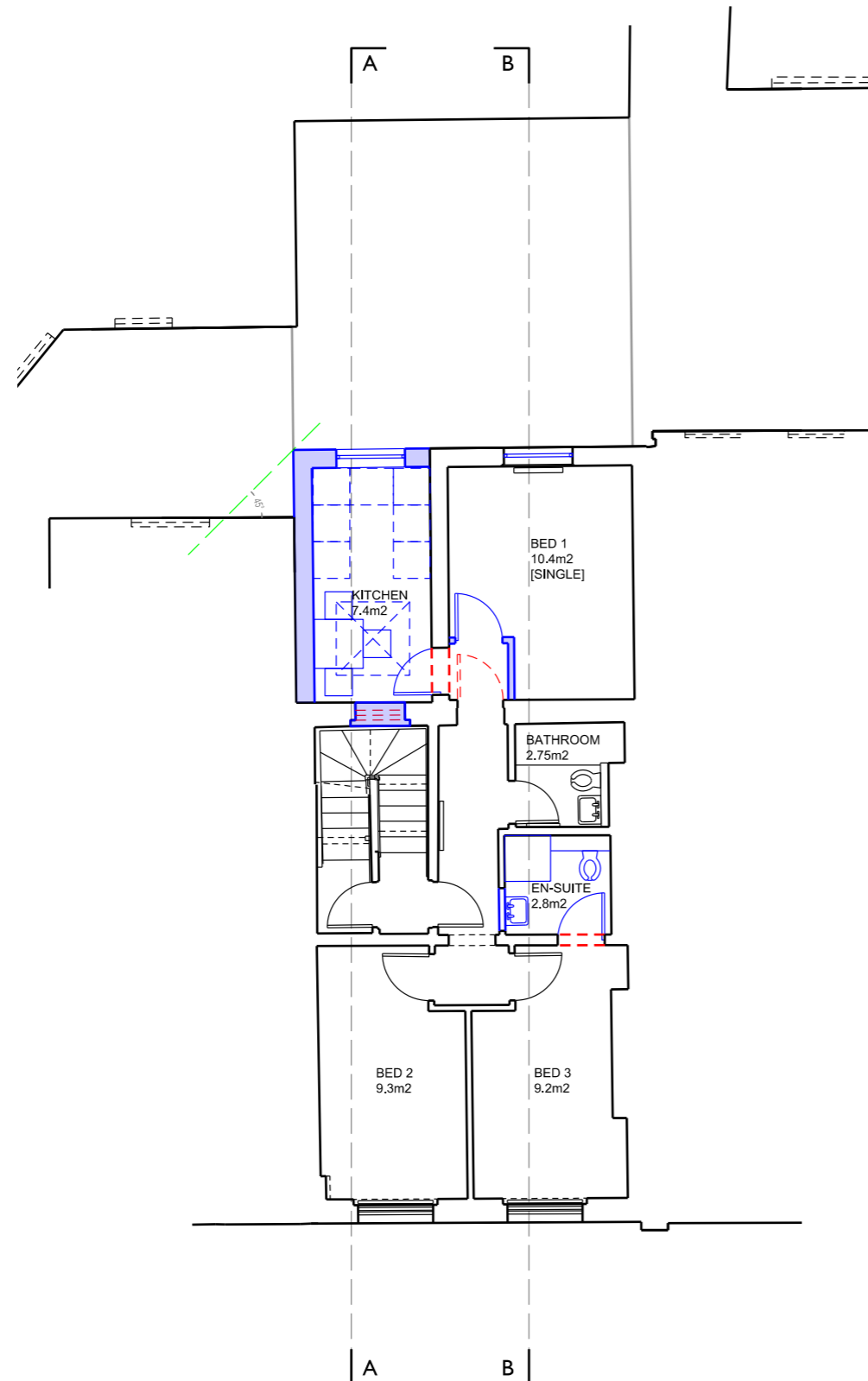
### 3.0 Design

### 3.1 Design Brief

The applicant's brief was to seek to increase the size and improve the quality of accommodation within the existing 2nd floor HMO unit while also upgrading the environmental performance of the building's fabric where alternations were deemed viable and beneficial.

In developing any proposals for the building, it was imperative that the protected status of the host building was acknowledged and any proposals consider the possible impact on the heritage asset as well as providing any enhancements to it where possible and appropriate.

In addition, the requirements of the relevant HMO legislation for accommodation would also need to be fully considered to ensure that all aspects could be met or, preferably and where possible, exceeded.



Proposed 2nd Floor Plan

### 3.2 Proposed Layout

A number of options were considered for the unit however, by the nature of the existing floor plan, including the established circulation route and common areas, the limitations of the existing site and proximity of adjacent buildings, these were naturally limited.

It was quickly established that the only real opportunity to improve the unit would be to build within the side return and directly over the previously approved extension at first floor level.

This would provide around 5-7m<sup>2</sup> of additional internal area for the flat so not sufficient to add any further bed space but this did allow the opportunity to move the internal, cramped kitchen to the back of the building, allowing this to be served by a window and allow more generous catering provision for the occupants, along with a dedicated dining area which is currently not afforded. Moreover, this would also allow the existing kitchen to be converted to additional bathroom accommodation, doubling the existing provision within the property.

A further option was considered to extend the existing roof terrace at 3rd floor level over the raised roof of the proposed side infill extension at 2nd floor level. This has however not been included in the application as it was felt that providing roof light into the new kitchen/dining area at 2nd floor was preferable, particularly as any enlarged terrace in this area could possibly encroach on the private amenity of the adjacent property which also already benefits from a roof terrace at this level. This was therefore set aside.

### 3.3 Proposed Amount, Scale and Use

#### Area & Unit Mix Schedule: Proposed

	Floor	Unit	GIA (sq.m)
	LGF	4 bed	76
	GF*	3 bed	53
	1*	4 bed	53
	2	3 bed	52
	3	4 bed	73 (40)
	4	inc.	(33)
	Communal	-	17
		<b>TOTAL</b>	<b>324sq.m</b>

#### Area & Unit Mix Schedule: Existing

	Floor	Unit	GIA (sq.m)
	LGF	4 bed	76
	GF*	2 bed	53
	1*	3 bed	53
	2	3 bed	44
	3	4 bed	73 (40)
	4	inc.	(33)
	Communal	-	17
		<b>TOTAL</b>	<b>316sq.m</b>

\*Including additional works as approved in recent applications (ref: 2022/5410/P & 2023/0668/L)

The proposed works are limited to the 2nd floor only, all to the rear of the property and within the existing HMO unit at this level.

In recent Full Town Planning and Listed Building Consents obtained from the Local Authority a small, full width extension at ground floor level was approved, the roof of which was also granted use as a new small external private amenity space for the improved 1st floor unit over. At first floor level, as well as the new terrace amenity space, the previously partially filled in side return was also fully infilled, bringing the facade of the rear elevation in line with the adjacent terracing at 162-164 N Gower St.

The current application seeks to extend the 2nd floor unit to infill the side return, over that approved at 1st floor level recently. The overall increase in gross internal area is 8sq.m, as shown in the tables below. This constitutes an increase of approximately 2.5% of the existing internal floor area across the building as now approved. This is a marginal increase and, as above, located solely at the rear of the property and there is no extension proposed beyond the rear building line at this level. Moreover, the extension will not impact on the daylight, outlook or amenity of any adjacent property.

While there is no proposed increase in bed space as part of this proposal, the works will vastly improve the quality of residential accommodation within the 2nd floor unit. Principally, this will provide an enlarged kitchen space - which is currently undersized for the amount of occupants - and is located deep inside the plan of the building away from any natural light or ventilation.

All interventions to the existing building have been minimised with minimal loss of existing fabric - only required to form two new single width doorways - and no alteration to the historic plan form of the building required as part of the proposals.

As above and elsewhere, with upgrade of thermal fabric, sympathetic detailing, appropriate materials and provision of new green roofing, these combined elements provide enormous benefit to the building while limiting and reducing the possible harm to the heritage building.

### 3.4 Appearance and Sustainability

The proposals seek to tidy up the existing rear elevation. The basement lightwell would be repainted, removing the unsympathetic yellow paint and replacing with a simple white, more typical of this type of extension.

At ground floor the rear terrace would be tidied, removing the clutter of the timber fence. The extended portion of the build would be in stock brick to match the existing. New timber doors would be installed. These would be traditional in their appearance.

The new external walls and roofs as well as new glazing will all be specified above UK Building Regulation requirements and low energy lighting will be installed. Furthermore a green roof is proposed over the full extent of the 2nd floor side return roof, mitigating surface water run-off and improving local biodiversity and air quality.



Left  
Annotated elevation, as proposed, including works approved in May 2023 indicated in PINK, with new proposals shown in BLUE

Above  
Precedent image of traditional doors, windows and white painted lightwell



## 4.0 Planning and Heritage

## 4.1 Planning Policy

The Policies and Documents listed below are deemed to be of particular significance to the application. They have each been carefully considered and works adopted to align with these policies wherever relevant and possible throughout the development of the proposals, as further described in this section.

### Camden Local Plan (2017)\_Strategic objectives:

Strategic objective 1 has been considered and are met by these proposals in so far as they assist in creating the conditions for growth, ensuring it takes place in the most appropriate and sustainable locations being central and already well developed and it minimises the impacts of development by creating additional residential accommodation with minimal additional building work and ancillary facilities. Furthermore, the proposals seek to harness and accelerate the benefits of this growth by helping to meet the needs of Camden's communities for homes while also preserving and enhancing the borough's unique character and appearance.

Strategic objective 2 has been considered and are met by these proposals in so far as they further contribute to the provision of a secure, safe, socially mixed and balanced local area with strong, cohesive and resilient communities to help reduce inequality in the borough, while supporting the provision of the accessible facilities and services needed to meet community needs by increasing accommodation on the principle entrance level.

Strategic objective 3 has been considered and are met by these proposals in so far as they provide additional residential accommodation that meets the housing needs of existing and future residents in terms of number, affordability, quality, type of property and mix of dwelling sizes.

Strategic objective 7 has been considered and are met by these proposals in so far as they contribute to the promotion of high quality, safe and sustainably designed buildings, places and streets and preserve and enhance the unique character of Camden and the distinctiveness of our conservation areas and our other historic and valued buildings, spaces and places.

Strategic objective 8 has been considered and are met by these proposals in so far as they will make Camden a better place to cycle and walk around, reduce air pollution, reliance on private cars and congestion by providing centrally located additional residential accommodation with no private car parking allowance and ease of access to a plethora of established and future public transport services.

Strategic objective 9 has been considered and are met by these proposals in so far as they increase available residential accommodation while minimising its energy use in the construction and use of the new and existing accommodation and is designed to adapt to, and reduce the effects of, climate change, with increased levels of insulation, higher performing glazing, low-energy lighting, water run off mitigation and increased green space and improved biodiversity.

Strategic objective 10 has been considered and are met by these proposals in so far as they increase and enhance local biodiversity by replacing an existing hard surfaced patio space with new green roof, providing for new habitats and open space.

### Relevant Planning Policies and Documents:

National Planning Framework (2019)  
The London Plan (2016) as amended  
The Draft London Plan (with modifications) 2019

Camden Local Plan (2017) Strategic objectives:

- 1,2 & 3

Camden Local Plan (2017) Policies

- A1 Managing the impact of development
- A3 Biodiversity
- C1 Health and Wellbeing
- D1 Design
- D2 Heritage
- H1 Maximising Housing Supply
- H6 Housing Mix and Choice
- H7 Large and Small Homes
- H8 Housing for older people, homeless people & vulnerable people
- H9 Student housing
- H10 Housing with shared facilities
- CCI Climate change mitigation
- CC2 Adapting to climate change
- T1 Prioritising walking, cycling and public transport

Camden Planning Guidance:

- CPG: Design
- CPG: Energy Efficiency and Adaptation

## Camden Local Plan (2017)\_Policies:

### Policy A1:

The proposed works would not give rise to any adverse impacts to neighbours.

### Policy A3:

The proposals incorporate a new green roof, replacing an existing asphalt flat roof, increasing local biodiversity.

### Policy C1:

The proposed works are modest in nature and will enable the existing unit at 2nd floor level to be modernised, additional residential floor space created and generally made it fit for current and future living demands. There would be no adverse visual impact from the public realm. The works would significantly enhance the quality of living accommodation for future residents.

### Policy D1 and D2:

The proposals provide high quality design that preserves and enhances the heritage asset as well as the character of the area, maintaining and improving a high quality environment while also improving sustainability, inclusivity and health and wellbeing of existing and future residents. In line with these policies, the proposals will significantly improve the quality of building and its landscaping.

### Policies H1, H6, H7, H8, H9 and H10:

These policies seek to maximise the Borough's available housing supply, including through mix and choice of available accommodation and that which supports students and vulnerable people and those who use housing with shared facilities.

The proposals are brought to Camden's Planning Authority in order that the existing low quality units currently occupying the 2nd floor can be enlarged, providing additional residential bathroom and kitchen facilities. When delivered, these proposals will increase the borough's available supply of high quality housing with shared facilities, available for single people, students and affordable housing types to meet the needs of households unable to access self-contained market housing, thereby meeting the relevant Local Plan policies.

### Policy CCI:

This policy seeks to mitigate Climate Change through sustainable design and reduction of carbon emissions.

Through intensifying the density of the existing units, these proposals will enable additional residential accommodation to be provided with marginal increase in the embodied carbon of the existing building. The proposals will also make the building more economically viable, thereby extending its use and retaining the carbon embodied within it. The upgrade of glazing and external wall and roof fabric beyond UK Building Regulation requirements and the use and installation of low energy light fittings will significantly reduce the energy requirements of the existing units and further reducing carbon emissions through occupation and use of the buildings. When delivered, the existing building will be more thermally efficient and the new residential accommodation will have been provided with marginal new building work being carried out compared to providing new standalone accommodation, thereby in compliance with the intention of policy CCI.

### Policy CC2:

Further to the above, the inclusion of an area of green roofing, which will replace an existing hard flat roof, will help towards the requirement to adapting to climate change. This new piece of green space will help to mitigate water run-off and will improve local biodiversity and air quality.

### Policy T1:

Being an intensification of an existing centrally located, car free, residential building with ease of access to a plethora of existing public transport links and local amenities, the proposals act to further prioritise and promote walking, cycling and public transport use.

The proposals seek to improve the quality of accommodation within the existing building. A range of options were explored leading to the arrival of a straightforward scheme to simplify and extend the existing ground and first floors, ultimately allowing enhanced amenity provision and improved room sizes within these HMO units.

## 4.1 Planning Policy

### Camden Planing Guidance\_Design:

In order to achieve high quality design the limited proposals which form the application have been developed after careful consideration in terms of:

- context
- height, scale and massing
- accessibility
- siting
- functionality and layout
- detailing
- materials

Specific Principles of high-quality design which have been met:

Context, height, scale and massing:

The proposals respond positively and sensitively to the existing context and integrate well with the existing character of a place, building and its surroundings. They ensure the scale of the proposal overall integrates well with the surrounding area, carefully responding to the scale, massing and height of adjoining buildings, the general pattern of heights in the surrounding area. They positively integrate with and enhance the character, history, archaeology and nature of existing building on the site and other buildings immediately adjacent and in the surrounding area. The proposals also use contextual materials and detailing to further preserve and enhance the character of the locality and the existing building.

Accessible:

Additional residential accommodation is to be provided which is centrally located and, therefore, connect well with existing places and easy to get to. Some additional accommodation is also provided at ground level so the proposals are permeable, being easy to access and move through.

Adaptable:

The proposals promote adaptability by being responsive to changing social, technological and economic conditions and community needs.

Liveable:

The proposals are compatible with the surrounding area and accommodate further residential use that works together with that in the remainder of the building and living, work and social uses in the locality, enhancing the locality as a viable place that respond to local needs.

Sustainable:

The proposals have been developed so as to be sustainable and efficiently consume resources, improving the performance of the existing heritage asset. By sensitively adding further accommodation to the existing building the proposals make efficient use of the site and will make use of good quality, durable materials.

## 4.2 Heritage Impact Assessment & Conclusion

The proposals seek to improve the quality of accommodation within the existing building. A range of options were explored leading to the arrival of a straightforward scheme to simplify and extend the existing 2nd floor, ultimately allowing enhanced residential accommodation within this existing HMO unit.

The existing building is of low significance. Alterations are proposed to the rear elevation, which has been substantially altered in the past. Some sections of the rear wall would be removed as a result of the works and recreated in a new location using the original bricks with other reclaimed bricks sourced to match where necessary. However, the rear elevation has already been altered previously with modern Catnic-type lintels and non-original windows being evident. As such, the removal of the non-original infill piece to the north of the outrigger, and re-constructed extensions with traditional materials, and detailing e.g. London reveals would offer some benefit to the host building.

There are no works whatsoever to the front elevation, front parts of the building or to any areas in the basement, ground, 1st, 3rd or 4th floors. Internal alterations at 2nd floor level are minimal, making better use of space and layout as previously altered when the buildings were split into separate flats (and/or at other times). These have a neutral impact on the building. The external appearance of the property to the street frontage will remain unchanged, maintaining the architectural integrity of the street frontage.

The rear of the building as existing is unremarkable, has been previously adapted and extended and is architecturally confused being variously adapted extended and converted over its approximate 200 years of life. The building's listing does not make specific reference to any internal features or rear façade, referring only to the front elevation. Furthermore, all proposed works are not visible from any public highway and the front elevation and front parts of the building and all parts of the basement, ground, 1st, 3rd and 4th (non-original) floors will remain entirely untouched.

Originally built with a generous semi private gardens within the interior of the street block, this was densely infilled and developed during the mid-19th Century with warehousing and has been further developed ever since, with numerous adjacent buildings extended, adapted and converted to a range of uses.

The proposals seek to address limitations of the existing building layout, resultant poor accommodation, lack of amenity space and, where works are proposed, its inefficient fabric and responds to previous extensions and adaptations of the host and neighbouring buildings in the location of the works, their scale, massing, height, functionality, layout, detailing and materials which increasing the amount of accessible accommodation on the principle entrance level of the property. Existing window and door positions and proportions are carried through to the newly positioned rear wall and, where relevant, made symmetrical with newly proposed doors, included to provide improved access and additional private external amenity space. Detailing is to be replicated where relevant, such as to provide matching brick lintels and existing materials, such as the facing bricks, will be carefully taken down where demolitions are proposed and re-used, with any additional bricks being reclaimed to match. All other materials will be contextual, durable and sustainable. In general, the approach has been to ensure the proposals respond sensitively to the special historic and architectural constraints of the existing listed building, rather than seeking any significant changes.

## 4.2 Heritage Impact Assessment & Conclusion

In accordance with Local Plan Policies CCI Climate change adaptation, CC2 Adapting to climate change through promoting higher environmental standards and D2 Heritage, the proposals seek to balance achieving higher environmental standards with protecting Camden's unique built environment. Climate Change mitigation measures are included while original or historic features will be retained and any necessary repairs undertaken in matching materials.

The proposed works are fully justified and the application documents demonstrate how proposals will not adversely affect the significance of the existing building and show why the works or changes are desirable and necessary to improve the viability of the building and are aligned with the majority of Camden's Strategic Objectives as set out in the Camden Local Plan (2017) and are therefore fully in line with Camden Local Plan policy H2 and the National Planning Policy Framework (NPPF) the Council which, rightly, will not permit the loss of or substantial harm to a designated heritage asset unless it can be demonstrated that the harm or loss is necessary and outweighs that harm or loss.

The proposed development is considered to be in compliance with the relevant Camden Planning Guidance documents, Camden's Local Plan and the National Planning Framework. The works are relatively minor in nature and there would be no material perceivable impact to the public realm. It is concluded that there would be no adverse impacts to the relevant heritage assets arising from the proposed works. The proposed works would be discrete and unobtrusive. It is considered that any potential harm to the listed building has been designed and positioned out as much as possible, and there would be public benefit in the continued efficient and comfortable use and upkeep of the building and, what is more, the provision of additional residential accommodation in line with relevant policies and target.

Having regard to the afore mentioned guidance and policy, it is not considered that the proposed development would have any adverse impact on the heritage asset or its setting. The works are discrete and minimal in the context of the large building (which forms part of a terrace) to which they would be carried out, and would not impact the front / main elevation of the building in any way. Thus there would be negligible impact on the special interest of the listed building. The building does not sit within a Conservation Area so any further consideration in this particular respect is immaterial. The fundamental intrinsic character of the property would remain unaltered and will be enhanced by the works. Much of the works are non-permanent internal alterations to the building in the sense that they can be removed at any stage and without any harm to the original building.

It is considered that the proposed works have a modest positive impact on the character and appearance of the building. Even if one were to take the view that the proposal might marginally fail to preserve or enhance the character and appearance of the designated heritage asset, then the level of harm would be at the lower end of 'less than substantial'. Paragraph 196 of the NPPF states that where a development would 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 optimal viable use.

## 4.2 Heritage Impact Assessment & Conclusion

It is submitted that public benefits of the proposal listed below would outweigh any minor harm potentially caused by the proposal, and the proposal could be considered acceptable accordingly.

- The proposals provides additional accessible, centrally located residential accommodation for students and those requiring use of shared facility housing,
- The proposals will work to adapt the building to climate change and reduces the borough's overall energy use.
- The proposals ensure the continued efficient and comfortable use and upkeep of the property which will assist in ensuring its future longevity.

Furthermore, the proposals are aligned with Camden's Design priorities in so far as they have been developed to consider and respond to the following:

- The context of a development and its surrounding area
- The design of the building itself
- The use and function of existing and surrounding buildings
- Using good quality sustainable materials
- Creating accessible, adaptable, sustainable, attractive and liveable places for residents.
- Opportunities for promoting health and well-being
- Opportunities for improving the character and quality of an area

Overall, it is not considered that the proposals cause any harm to the significance of the existing building. The amendments are modest in scale and offer some aesthetic simplification to the scheme which are indeed beneficial.

In summary, the proposals are well considered and appropriate within the principals and requirements of Camden's relevant policies. They are felt to be minor and not of significant harm to the heritage asset while significantly improving its quality, functionality and performance, ensuring its long term use as a secure, healthy, accessible and sustainable constituent part of the Borough's housing stock. As such they are recommended for favourable consideration by local planning and heritage officers.

End

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