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Dear Mr Zuk,

Planning Application (LPA reference: 2024/3123/P) proposing the 'Erection of single-storey roof extension to provide 2 new residential (Class C3) units' at: Glebe House, 15 Fitzroy Mews, London, W1T 6DP.

DLP Planning have been instructed by the leaseholders of Glebe House to lodge a formal objection to Planning Application 2024/3123/P, submitted by Works Architecture on behalf of John Broomfield. The Application seeks permission for the: *'Erection of an additional storey to create 2 residential dwellings.'*

As detailed in the response below, the leaseholders of Glebe House object to the proposed extension in respect of its scale, impact upon the Fitzroy Square Conservation Area and the potential impact upon residential amenity. The leaseholders are also concerned about the impacts which would arise from construction, specifically in relation to noise, additional traffic and access within the Mews. Further details are set out below.

Scale of the Proposed Development

Wholly located within the application site is 'Glebe House', a five-storey mixed use building, consisting of Use Class E (Commercial, Business and Service Activities) at the ground, upper ground and lower ground floor, and Use Class 3 (Residential) at the first, second, third and fourth floors. The proposed planning application seeks permission to construct an additional storey above the existing building to provide one 1-bedroom, 2-person apartment, and one 1-bedroom, 1-person/single occupancy apartment; therefore, providing a total of two new residential units.

A previous scheme which sought to establish an additional storey to provide one 1-bedroom, 2-person apartment under reference 2021/1782/P was refused by the Local Planning Authority/Camden Council on 11/11/2021. Notably, one of the reasons for refusal was related to the unacceptable increase in height, bulk and mass which was considered detrimental to the host building and streetscape. Such a development would be contrary to Policy D1 (Design) and D2 (Heritage) of the Local Plan, as well as the Fitzroy Square Conservation Area. It should be noted that the previous scheme proposed to increase the height of the building (measured from the ground floor level of Cleveland Street) by approximately 1.5 m which is approximately 300 mm less than what is presently proposed by the Applicant.

Under this refused scheme, the Case Officer noted at paragraph 2.19 of the Delegated Report, that the additional storey would *'...harm the relationship Glebe House has with these nearby buildings and would make Glebe House even more dominant in the street scene along Cleveland Street'*.

A look on Google Satellite View (Figures 1 & 2) shows that there is a prevailing height datum at this location, and a prevailing roof line across the immediate surroundings and this can be seen to be the case for a considerable distance in all directions. Further, as it stands Glebe House is clearly one of the tallest buildings within the immediate area. Any new height above this prevailing roof line currently set by Glebe House, will stand out in a messy and incongruent manner.



Figure 1: Google Satellite view (south of Glebe House looking north) showing Glebe House to be one of the largest buildings in the immediate vicinity.



Figure 2: Google Satellite view (north of Glebe House looking south) showing Glebe House to be one of the largest buildings in the immediate vicinity.

National Planning Policy Framework (NPPF) Chapter 2 'Achieving sustainable development' under the sub-heading 'presumption in favour of sustainable development makes clear that: "*strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless, the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*"

In this instance, the impacts of poor design and harmful impacts to the character and appearance of the area (including the setting of the Fitzroy Square Conservation Area) significantly and demonstrably outweigh the benefits of creating just two additional, single and double occupancy dwelling units into the housing supply.

The NPPF also requires (under Chapter 12 'Achieving well-designed and beautiful places') that planning policies and decisions ensure that developments "*will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.*" Further, the NPPF also requires developments to be "*visually attractive as a result of good architecture, layout and appropriate and effective landscaping.*"

In addition to this, developments which proposed to develop above existing buildings to utilise space, paragraph 124(e) of the NPPF states that Local Planning Authorities (LPAs): "*...should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene...*". This is emphasised by Policy D1 'Design', point a) of the adopted Local Plan which requires developments to respect the local context and character of a location. The Appellant has proposed a scheme which fails to respond well to and contribute positively towards the character and appearance of the immediate surroundings.

Currently, when measured from the ground level of Cleveland St to the top ridge height of the existing fourth floor, Glebe House has a height of approximately 15.6 m, however, should you include the fifth floor which operates as a lift to the roof, this increases the overall height to be approximately 17 m. On the submitted Application Form, the Applicant notes that the proposed extension would increase the overall height of Glebe House to be no higher than 18.8 m, thus representing a 1.8 m increase. However, upon measuring the proposed set of plans, it is understood that this does not include the lift which is to be extended and reach a further 1.1 m above the proposed fifth floor. The Applicant has therefore failed to accurately describe the proposed works, therefore minimising and misrepresenting the actual and overall scale and the real impact of the proposed works. Therefore, it is considered that the proposed works will result in an overall increase in height of approximately 2.9 m.

N.B. No dimensions have been provided on the submitted plans, as such all measurements provided in the assessment which follows have been taken using the scales included.

As established in Figures 1 and 2 above, Glebe House as it stands is already higher than other buildings along Cleveland Street, many of which are four storeys. For example, directly opposite the application site to the west, is a five-storey terrace building including mansard (127-129 Cleveland Street) which is of a height with Glebe House, with an overall height of 17.1 m. Should the proposal be approved, Glebe House will sit approximately 1.8 m higher (2.9 including the lift). In respect to the four storey (including mansard) adjoining terrace to the north (100-126 Cleveland Street), Glebe House is currently 4.8 m higher, Should the application be approved, Glebe House will tower over this existing terrace by approximately 6.6 m (7.7 m including the lift). Additionally, the adjacent terraces to the south (86-90 Cleveland St), would sit approximately 1.3 m (2.4 m including the lift) below Glebe House following construction of the proposed works.

Drawing No. e-100 (Figure 3), shows the proposed front elevation of Glebe House which fronts Cleveland Street and includes the adjacent/adjoining terraces located directly north and south. Annotations have been inserted to indicate the height of these existing buildings in contrast to Glebe House after the proposed works have been completed. It is clear that the additional storey would result in an overly dominant building with no positive relationship with nearby buildings, particularly the adjoining terrace to the north (100-126 Cleveland Street).

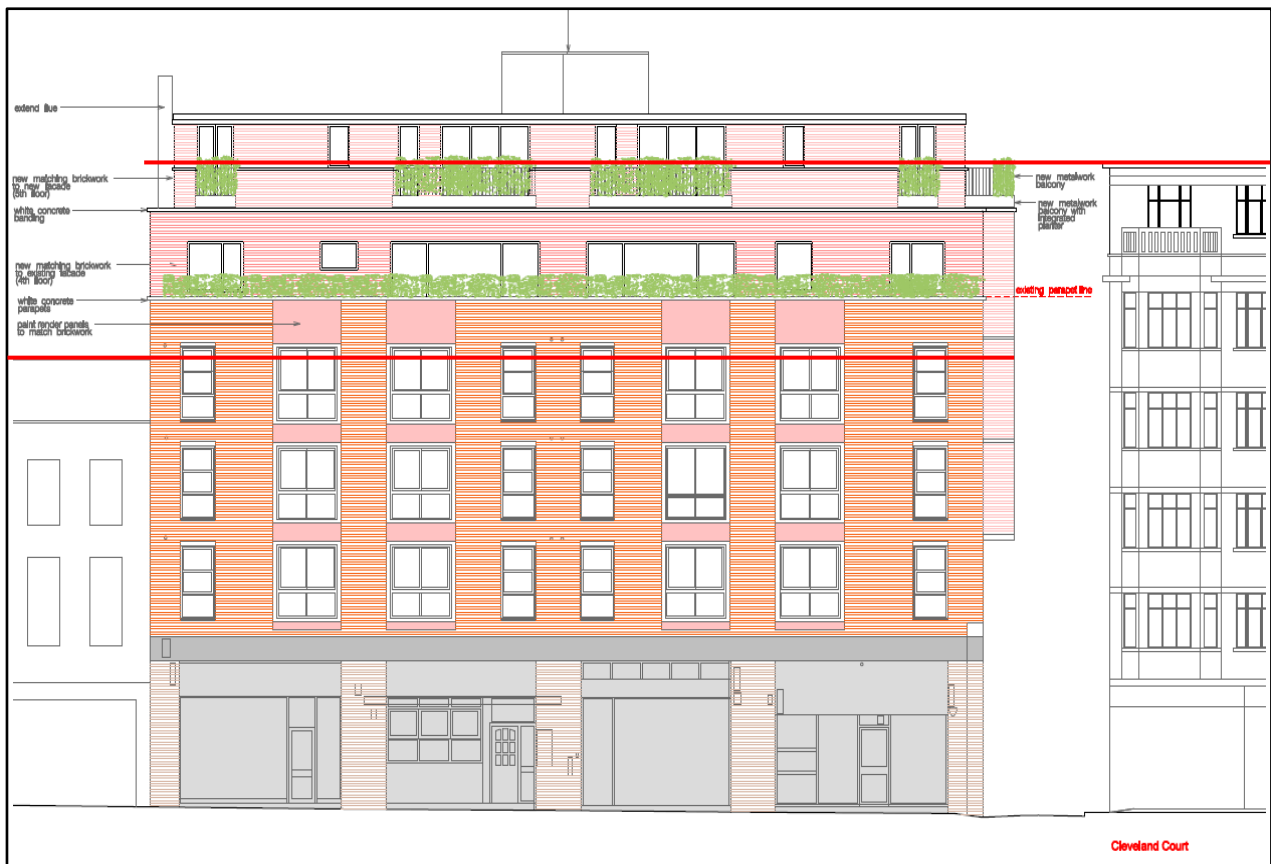


Figure 3: Dwg No. e-100, with two red lines inserted to compare the height of neighbouring buildings.

By not providing dimensions on the submitted plans, the Applicant has made it difficult for the Local Planning Authority and members of the public with an interest in the proposal, to accurately understand the scale of the development. This is further exacerbated by the Applicants failure to acknowledge the difference in site levels between Fitzroy Mews to the east and Cleveland St to the west. No topographic survey was included in the planning application nor have site levels been included in the submitted plans.

Notwithstanding, measurements of the submitted plans using the scales provided, indicates that there is an approximate 1.8 m difference between the two frontages, therefore the units located directly opposite Glebe House within the Mews (4 – 7 Fitzroy Mews) sit considerably lower than the Glebe House. The mews have an overall height of 8.5 m, should the proposal be approved, the eastern elevation of Glebe House would measure to be 22 m in height from Fitzroy Mews and dominate over 4-7 Fitzroy Mews by approximately 13.5 m as shown in Figure 4 below.

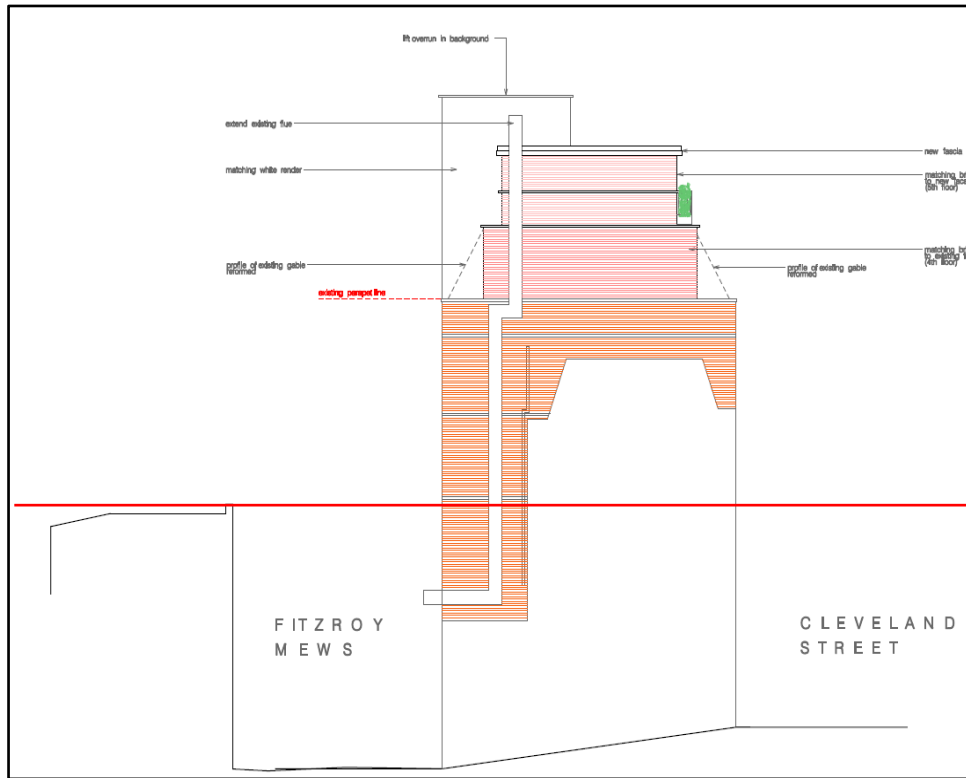


Figure 4: Dwg No. e-103, with a red line inserted to show the difference in height between 4-7 Fitzroy Mews and Glebe House.

Overall, the Applicant has failed to articulate the full scale of the development and the significant negative impact this will have on the relationship between Glebe House and the neighbouring properties both along Cleveland Road and within the Mews.

It is accepted by the leaseholders of Glebe House that the Applicant has made an attempt to mitigate the perceived bulk of the proposed addition by taking a tiered approach, however the execution of this strategy fails to achieve the intended outcome due to the existing form of the host buildings. As noted within the submitted Design and Access Statement (DAS), the Applicant acknowledges that Camden Council also took this view during the pre-application process (LPA reference: 2023/3625/PRE). The DAS did not include any further commentary in terms of how this has been addressed or how the potential impacts have been mitigated, therefore it is anticipated that Camden Council will continue to hold the view that this addition would sit uncomfortably on top of the existing Glebe House.

Given the above, the leaseholders of Glebe House strongly object to the proposed scheme due to the unacceptable increase in height, scale and mass which would result in an overly dominate structure that would fail to have a positive relationship with the local character and context in which it sits.

Impact on the Fitzroy Square Conservation Area

The application site lies within the western edge of the Fitzroy Square Conservation Area with Cleveland Street forming the boundary of the Conservation Area (CA).

The 'Fitzroy Square Conservation Area Appraisal and Management Strategy (2020)' states at paragraph 3.1 that the CA is:

'...a distinctive and consistent area of late 18th and early 19th century speculative development. Owing to the relatively short period of its development, the area generally retains a homogenous character. It is an excellent example of Georgian town planning which combined dwellings with ancillary uses and services. The buildings varied in size and status, with the grandest overlooking the central formal, landscaped square, and the humblest located within the rear mews areas.'

The Strategy refers specifically at paragraph 6.30 to:

"...the terraces along the east side of Cleveland Street are predominantly three storeys in height with small attic windows within the mansard, although there are some four storey elements (mainly south of Grafton Way). Nos 66-84 & Nos 100-126 are considered to be groups that contribute to the character of the area, particularly No 106 which is grade II listed and has a fine shopfront. These blocks have a consistent elevational treatment and rhythm of fenestration and consistent plot widths."

It is considered that the proposed height increase of Glebe House will have an adverse impact on the setting of these buildings and the townscape and character of the wider CA.

Notably, paragraph 6.33 of the CA Strategy states that:

"Fitzroy Mews retains its granite sett surface but has no buildings of note. The three-storey 20th century houses and offices on the eastern side take on a mews character and have large ground-floor openings with timber doors. Some of the brickwork has been painted and cedar cladding has been applied to articulate elements of the facades as part of a recent upgrade. There is also a three-storey late 20th century mews house built in stock brick to a neo-Victorian style that terminates the view to the north. These buildings are constructed from a buff brick consistent with the character of the area. The view to the south is terminated by the rear elevation of No 80 Grafton Way (listed grade II) which is in London stock brick and has a distinctive double-height slate mansard roof. The eastern side of the mews is dominated by five-storey red brick blocks of flats which have access walkways and balconies to the rear above first floor level."

Even with the tiered approach the Applicant has taken, the increase in height via an additional storey will make Glebe House even more of a prominent structure within the Mews and detract from the character and appearance of the Mews and wider CA.

Further, at paragraph 12.4 of the CA Strategy it is explained that alterations and extension have a cumulative and individual adverse impact upon the character and appearance of the area. This includes, inappropriate roof level extension, particularly where this interrupts the consistency of a uniform terrace of the prevailing scale and character of a block where they are overly prominent in the street. As explained within the previous section, it is felt that the proposal would interrupt the street scene and result in an overly prominent building along Cleveland Street and within the Mews.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a CA. As a result of this, there is a statutory presumption in favour of the preservation of the character and appearance of a conservation area, meaning that Camden Council is required

to place considerable importance and weight to their preservation. Although this revised scheme has been revised in an attempt to address the previous reasons of refusal relating to bulk and massing, it is still considered to pose a risk to the CA for the reason listed above.

It is therefore considered that the proposed roof extension to Glebe House would not accord with Local Plan Policies relating to heritage and conservation, nor paragraph 13.16 of the Fitzroy Square Conservation Area Strategy which states that:

'Development proposals must preserve or enhance the character or appearance of the Fitzroy Square Conservation Area. This requirement applies equally to developments which are outside the Conservation Area but would affect its setting or views into or out of the area.'

Impact on Residential Amenity

Local Plan Policy A1 (Managing the Impact of Development) seeks to protect the quality of life of occupiers and neighbours, whilst considering the impact upon sunlight, daylight and overshadowing.

A Daylight and Sunlight Report has been prepared by Right of Light Consulting and submitted in support of the Planning Application. The assessment considered the impact of the proposed development in respect of the light able to be received by 1-13 Cleveland Court, 4-10 Fitzroy Mews, 90B & 100 Carlton House and Clifton House. It should be noted that this does not include all neighbouring properties that will be affected by the proposed development, this includes 100 Cleveland St to the north.

Although the Report concludes at paragraph 4.5.1, that numerically the proposed development will have a low impact on the light receivable by the above-named properties, it should be mentioned that at paragraph 5.1.5, it is noted that the assessment was undertaken with limited access and information readily available, as such assumptions have been made to reach this conclusion.

Whilst it is accepted by the leaseholders that this assessment has been completed by suitably qualified professionals, we ask that attention is paid to Appendix 2 which provides the numerical results of the 'Vertical Sky Component' (VSC). This shows that the current VSC of the above-mentioned properties are already quite low, and should the proposal be granted permission and subsequently developed, some properties (particularly 4-10 Fitzroy Mews) could experience a loss between 0.1 - 4.2 %.

Construction Impacts

The leaseholders also object to the proposed development in part due to the impact and disturbance that will arise during the construction phase. Such impacts such as noise and vibrations would be especially bad for the occupied flats that are currently located on the top floor of Glebe House. Paragraph 6.13 of the Local Plan states that to demonstrate that the impact of construction works, mitigation measures must be outlined in a Construction Management Plan, including for developments that could cause significant disturbance.

At page 20 of the submitted DAS, the Applicant has noted that upon the issue planning permission, a CMP will be provided to Camden Council. However, the leaseholders do not find this acceptable as the Council are unable to accurately assess the application especially in relation to Local Plan Policies A1 (Managing the Impact of the Development), CC4 (Air Quality) and DM1 (Delivery and Monitoring).



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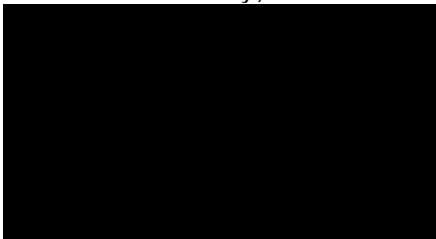
Summary and Conclusion

As set out above, the leaseholders of Glebe House object to the application to extend Glebe House through an additional floor as it will increase the height and scale of the existing building to an unacceptable level that will have an adverse impact upon the surrounding townscape and character of the Fitzroy Square Conservation Area. The leaseholders also have concerns regarding the impacts which will ensue during the construction phase of the development including noise and construction traffic.

It is also considered that the current proposal has not been successfully revised to adequately address the previous reasons for refusal in respect of planning application 2021/1782/P.

We trust that you will take these comments into account when assessing the planning application.

Yours sincerely,



Kerryn Penn [Redacted]
Senior Planner
DLP Planning Ltd



c.c. Leaseholders of Glebe House