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Contact: Sam FitzPatrick
Direct line: 020 7974 1343
Email: sam.fitzpatrick@camden.gov.uk

Planning Solutions Team
Regeneration and Planning
 Supporting Communities
 Directorate
 London Borough of Camden
 2nd Floor
 5 Pancras Square
 London
 N1C 4AG

Montagu Evans LLP
70 St Mary Axe
London
EC3A 8BE

www.camden.gov.uk/planning

Dear Louisa,

Re: The Rotunda, 42-43 Gloucester Crescent, London, NW1 7DL

I refer to your pre-planning application enquiry 2024/0380/PRE at above address. Thank you for sending the documents detailing the proposed refurbishment to the property, as well as the site visit conducted on 23rd April 2024 and subsequent additional information relating to the side entrance provided on 21st May 2024.

1. Proposal

The proposal involves the general refurbishment of the building associated with its use as offices. These would seek to improve the quality of the existing office floorspace as well as the energy performance of the building, including through the installation of plant equipment. There are also proposed landscaping works to the rear courtyard.

2. Site description

The application site consists of a large Grade II listed building located on the north side of Gloucester Crescent, at the northern intersection of the crescent with Oval Road, within the Primrose Hill Conservation Area. The building comprises of a circular structure set over four storeys with an additional basement/lower ground level and was built in the mid-19th century, serving as a piano factory and set within a group of historic industrial and warehouse buildings.

Due to the building's listed status, it contributes positively to the conservation area, and is noted in the Primrose Hill Conservation Area Statement as being "*particularly distinctive due to its corner location, its size, at four storeys high with basements, and its circular form*". The building's significance includes its architectural design and materials, planform, evidential value as a 19th century piano factory, and its townscape value including its role in the setting of neighbouring listed buildings and its positive contribution to the character and appearance of the conservation area.

3. Relevant planning history

Application site

2021/4865/P – Refurbishment of the lower ground floor of the building. **Certificate of lawfulness of proposed works to listed building granted 06/01/2022.**

2020/0504/L – Remove existing asphalt and felt roof coverings to flat roof over the link building and central flat roof to the rotunda building. Install a Triflex ProTect cold applied liquid waterproofing system. Overhaul and refurbish central downpipes to the rotunda flat roof and outlets at flat roof level. **Listed building consent granted 16/03/2020.**

2016/1753/L – Reconfiguration of modern internal stud partitions. **Listed building consent granted 01/06/2016.**

2015/3399/L – Internal works to partitions at 1st, 2nd and 3rd floor levels. **Listed building consent granted 08/12/2015.**

2014/3145/P & 2014/3338/L – Erection of associated acoustic housing to facilitate the relocation of 10 no. existing air handling units. **Permission and listed building consent granted 10/11/2014.**

2013/3337/P – Change of use from offices (Class B1a) to a flexible use of B1a and D1 (non-residential institution) at lower ground floor level (retrospective). **Permission granted 15/08/2013.**

4. Relevant policies and guidance

The National Planning Policy Framework 2023

The London Plan 2021

Camden Local Plan 2017

- **E1** Economic development
- **E2** Employment premises and sites
- **A1** Managing the impact of development
- **A4** Noise and vibration
- **D1** Design
- **D2** Heritage
- **CC1** Climate change mitigation
- **CC2** Adapting to climate change
- **T1** Prioritising walking, cycling, and public transport
- **T2** Parking and car-free development

Camden Planning Guidance

- CPG Amenity (Jan 2021)
- CPG Design (Jan 2021)
- CPG Employment sites and business premises (Jan 2021)
- CPG Energy efficiency and adaptation (Jan 2021)
- CPG Transport (Jan 2021)

Primrose Hill Conservation Area Statement 2000s

5. Assessment

The planning considerations material to the determination of an application would be as follows:

- Land use
- Design and conservation
- Amenity
- Transport
- Energy and sustainability

6. Land use

As a brief note on land use, it should be noted that the lower ground floor was granted permission in 2013 to change use to a flexible use of B1 and D1. This permission included a condition to state that, notwithstanding the provisions of Class D1, when not in use as B1, the premises shall only be used as a private training company and commercial recording studio. Since the time of this previous permission, the use class order has been updated in 2020, which saw both B1 and D1 superseded and replaced with new use classes. Class B1 would now be considered to fall within Class E and Class D1 was split out into uses falling within Classes E and F2, as well as several newly defined 'Sui Generis' uses.

The use as training company and commercial recording studio would likely now be considered to fall within Class E rather than any other use class or a Sui Generis use. Although the provision of education would fall under Class F1, a training company is more similar to Class E, particularly E(c). Regardless, the 2013 permission would result in the lawful use defaulting to B1 when not in use as a training company/recording studio (Class D1), which would now be considered Class E. As such, it is not considered that any permission would be required to change the use of the property to Class E. Irrespective of its current lawful use, it is likely that a change of use to Class E would be supported in this location.

7. Design

The Council's policies on design aim to achieve the highest standard of design in all developments. Policy D1 (Design) requires that development considers the local context, setting, and character and for development to integrate with the form and scale of surrounding buildings.

Policy D2 (Heritage) states that the Council will only permit development both within conservation areas and to listed buildings if it preserves or enhances the character and appearance of the heritage assets. In particular, proposals will not be supported where alterations or extensions to a listed building would harm the special architectural and historic interest of the building.

The Camden Planning Guidance (CPG) on 'Design' sets out Camden's expectations for development, stating that the Council will seek to ensure that development responds positively to the existing context and character of the building and its surroundings. In the case of listed buildings, proposals should seek to "*respond to the special historic and architectural constraints of the listed building, rather than significantly change them*".

As noted in a previous part of this pre-application letter, the significance of this building comes from its architectural design and materials, planform, evidential value as a 19th century piano factory, and townscape value including its role in the setting of neighbouring listed buildings and its positive contribution to the character and appearance of the conservation area.

There is no objection in principle to the re-provision and rationalisation of mechanical plant at the site. The chief sensitivity would be the location of external plant at roof level on the annex to the building, for which two options have been provided as part of the pre-application submission. The first of these options would be to situate the plant room to the north of the annex roof, where it would be shielded from views from Gloucester Crescent but visible from the rear courtyard of the site, and the second of these options would be to locate the enclosure to the south of the annex roof, where it would be visible from views from Gloucester Crescent but hidden from the site courtyard. Of these, the first option would be clearly preferred, as its situation to the rear (north) of the roof would be considerably less harmful than to the front where it would be visible as part of the Gloucester Crescent frontage.

The host building is a flat-roofed Victorian industrial building and the character of the courtyard is chiefly industrial, so providing the plant enclosed in a suitable manner (such as with dark metal screening) would mean that its appearance would not be substantially different from Victorian watertanks and other 19th century industrial roofscapes. The siting of the new plant equipment would also be appropriate to its context and is not considered to be problematic in terms of the setting of the listed building or the character and appearance of the conservation area. Alternatively, siting the plant room to the south of the roof would result in clear visibility and would negatively affect the setting of the listed building, as well as those in the immediate vicinity and the character and appearance of the conservation area. Therefore, the first option to the north of the annex roof is clearly preferred for the plant room.

The internal ductwork and ventilation has been designed in a manner which minimises its visual impact on the spatial qualities and remaining historic fabric of the interior. The chief qualities and significance of the interior is the legibility of historic fabric and planform; there is very little decorative finish or detail given the historic manufacturing function of the building. Therefore, it is not considered that replacing the existing internal ductwork and other suggested works would result in any further harm to the special architectural and historic interest of the interior. The removal of modern paintwork, the installation of secondary glazing, and the replacement of the damp proof course and raised floors is all acceptable subject to methodology/detail, which should be provided at application stage.

The most visually conspicuous alteration to the asset, aside from re-landscaping, is the proposed replacement of the ancillary "porch" to the front lightwell. It is clear that the door and roof of this building have been altered or replaced since the 19th century, but

nonetheless it still resembles a 19th century ancillary structure. Replacing it with a new structure of more architectural importance would not be supported, as the modest and industrial character of the existing building is part of its evidential value and forms an element in the character and significance of the listed building as a whole. It is very likely that the existing building could be adapted for accessible entrance capacity without losing much of its historic character or fabric. There is no objection in principle to the re-creation of a glazed rooflight as per the Goad plan, but it would need to be historically convincing, given it would be a highly visible element from the street.

Some further options have been supplied since the initial pre-application discussions, both of which would entail retaining the existing structure but extending and refurbishing including through extending the façade and replacing the roof. Although these options are more modest than the initial replacement, they still seek to alter the ancillary character of the structure into something more akin to a modern entrance. The form, scale, and plainness of the existing structure needs to be preserved or more closely replicated in order to be acceptable.

External signage improvements are also likely to be acceptable subject to scale, design, location, quantity, and the effect of any proposed illumination (which should be static, low-illuminance, and preferably externally illuminated, given the context of the conservation area). These may also require a separate application for advertisement consent.

Landscaping improvements to the courtyard would be both achievable without harm and welcomed, especially as the courtyard is currently laid as tarmac and in use as carparking. This is subject to details of hard surfacing materials, and it would be helpful to know if any stone sets, granite carriage wheel runs, or other features survive under the tarmac.

In summary, the proposals are broadly acceptable in principle, subject to further details that would be provided at application stage. The proposed plant room should be situated to the rear (north) of the annex roof and should appear subordinate in design. The proposed internal revisions are largely acceptable subject to further detail.

8. Amenity

Local Plan Policies A1 (Managing the impact of development) and A4 (Noise and vibration) seek to protect the amenity of Camden's residents by ensuring that the impact of development is fully considered; they aim to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents. This includes loss of privacy through overlooking, loss of outlook, and implications on daylight, sunlight, and noise. CPG 'Amenity' provides specific guidance with regards to these factors.

The only aspect of the proposed scheme that is likely to give rise to potential amenity impacts is the proposed plant equipment. Any submission for planning permission would need to be supported by a noise impact assessment to demonstrate that the noise levels would be in keeping with Camden's minimum standards. The noise impact assessment should include:

- Existing background noise levels measured over a 24 hour period (including the cumulative noise levels of all existing units)

- Proposed noise levels (including the cumulative noise levels of all proposed units)
- Any proposed measures to reduce noise from the proposed development (including details of the plant enclosure and any noise mitigation screening such as elevations, sections, and plans)
- The system manufacturer's specification of any proposed equipment to be installed, altered, or replaced
- Details of the method used to compile the report and examples of the calculations and assumptions made.

The noise impact assessment would need to be reviewed by the Council's Environmental Health Officer prior to a decision being issued, so that it could be confirmed that the proposal would be acceptable in environmental health terms. Further information can be found in Policy A4 of the London Borough of Camden Local Plan 2017 and CPG 'Amenity'.

9. Transport

Policy T1 (Prioritising walking, cycling, and public transport) aims to promote sustainable transport by prioritising walking, cycling, and public transport. This is achieved by improving pedestrian friendly public realm, road safety and crossings, contributing to the cycle networks and facilities, and finally improving links with public transport. All these measures are in place to ensure the Council meets their zero carbon targets. Policy T2 (Parking and car-free development) limits the availability of parking in the borough and requires all new developments in the borough to be car-free. This will be done through not issuing parking permits, resisting the development of boundary treatments, and using legal agreements to secure these actions.

Although limited information regarding the public realm improvements is provided, it is noted that cycle storage opportunities would be pursued to encourage the use of bikes to and from the site. The inclusion of bike storage would be supported, and any cycle spaces should follow the guidance set out in CPG 'Transport'.

It is not entirely clear how the car parking spaces that currently exist within the courtyard area would be managed; although the public realm indicative plan appears to show that the parking spaces are maintained, the 3D representation of the courtyard area in the Design and Access Statement appears to show that at least some of these spaces would be taken out of use. Any reduction in car parking spaces at the site would be encouraged, though it is accepted that this is outside the scope of the application.

10. Energy and sustainability

Policies CC1 (Climate change mitigation) and CC2 (Adapting to climate change) require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards.

If new air conditioning were to be proposed (beyond just replacing existing units), then this would need to be justified with regards to the Council's sustainability policies, as well as those of the London Plan. A sustainability and energy statement would need to be provided as part of any application for planning permission to demonstrate how the cooling hierarchy has been followed to reduce energy demands within the building and to

justify the need for additional plant in accordance with Policy CC1 and CC2 of the Local Plan. This should show that passive measures have been explored and discounted to give justification that overheating is a realistic prospect without active cooling. Further information can be found in CPG 'Energy efficiency and adaptation'.

11. Conclusion

In conclusion, the proposal is acceptable in principle, subject to further details. The refurbishment works appear to be appropriate in the context of the building and would likely not be seen as harmful to the special character of the listed building or the character and appearance of the conservation area. Further consideration needs to be given to the ancillary porch to the front lightwell, primarily to amend the design so that it appears more as a subordinate structure rather than a modern entrance addition. The proposed plant equipment would also need to be clearly justified in both noise impacts and sustainability terms, so that officers can be confident that there would be no significant impacts to neighbouring amenity and the proposal would be compliant with sustainability policies.

12. Planning application information

If you submit a planning application which addresses any of the above issues detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – Full Planning Permission and Listed Building Consent
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red;
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Detailed drawings of plant room to annex roof, including plans, elevations, and sections;
- Design and access statement;
- Heritage statement;
- Methodology and details of internal works (including removal of modern additions, installation of secondary glazing, and replacement of the damp proof course and raised floors);
- Noise Impact Assessment;
- Hard and soft landscaping plan;
- Sustainability statement;
- The appropriate fee – see: [A Guide to the Fees for Planning Applications in England \(planningportal.co.uk\)](https://www.planningportal.co.uk/fees/);
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a site notice on or near the site and, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter please do not hesitate to contact Sam FitzPatrick through the email or number above.

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

Yours sincerely,

Sam FitzPatrick

Senior Planning Officer
Planning Solutions Team