

Henry Yeung
Planning
London Borough of Camden
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5 Pancras Square
London
N1C 4AG

Date: 31 January 2025

Planning Portal Ref. **PP-13681272**

Dear Henry,

8 Guilford Street, London, WC1N 1DA - Section 96a Non-Material Amendment (NMA) Application to Planning Permission Ref. 2023/4236/P

On behalf of DCCM Fashion Limited (hereinafter 'our Client'), please find enclosed an application under Section 96a of the Town and Country Planning Act (as amended) to planning application reference **2023/4236/P** at 8 Guilford Street, London, WC1N 1DA (hereinafter 'the Site').

This Non-Material Amendment application follows the recent applications for Full Planning Permission (Ref. **2023/4236/P**) and Listed Building Consent (Ref. **2023/4410/L**) at the Site.

Site & Surrounding Area

The Site is positioned on the prominent corner of Doughty Street and Guilford Street and is located wholly within the administrative boundary of the London Borough of Camden ('LBC'). The property is Grade II Listed and falls within the Bloomsbury Conservation Area. The building was constructed in circa. 1792-1800 formed of London yellow stock brick and a stucco ground floor. The property is listed as part of a wider group (Ref. 1245855) comprising 8, 9 and 10 Guilford Street and the attached railings at 9 and 10 Guilford Street.

The Site is bound to the west by 9 Guilford Street, a Grade II Listed Building that comprises self-contained residential flats (Use Class C3), across basement, ground and three upper floors (with mansard upper storey). Further west is Doughty Mews that provides further residential properties. To the south is 19 Doughty Street, another property arranged over basement, ground and three upper floors which is occupied by Doughty Street Chambers. Further to the south of the Site lies Corams Field. To the north of the Site is London House (also known as Goodenough College) which is Grade II Listed, which provides postgraduate student accommodation and an educational trust at Mecklenburgh Square, Bloomsbury.

The surrounding area is characterised by townhouses built in long terraces with rear mews, that were once primarily residential, however the surrounding area now includes a mixture of uses, such as commercial offices, as well as legal and education institutions. The surrounding area also comprises a high concentration of designated and non-designated heritage assets.

Relevant Planning History

Full planning permission and Listed Building Consent was granted in July 2024 to sub-divide the building to create a self-contained residential unit (Class C3) alongside a commercial unit (Class E). The relevant applications details associated with this consent are summarised below. These consents have not yet been implemented.

Full planning permission (**Ref. 2023/4236/P**) was granted on 26th July 2024 for the following:

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Knight Frank LLP is a limited liability partnership registered in England and Wales with registered number OC305934. Our registered office is at 55 Baker Street, London W1U 8AN. We use the term 'partner' to refer to a member of Knight Frank LLP, or an employee or consultant. A list of members' names of Knight Frank LLP may be inspected at our registered office.

Regulated by RICS

'Part change of use from commercial floorspace (Class E) to a self-contained residential dwelling (Class C3), first floor rear extension, creation of dormer, insertion of two entrance doors on Guilford Street elevation, and various other external alterations as part of refurbishment of existing building.'

This application was approved alongside Listed Building Consent (Ref. 2023/4410/L) for the following:

'Erection of first floor rear extension to provide additional residential floor space, insertion of a dedicated entrance for the residential dwelling from Guilford Street, replacement of existing mansard hatch with a new window, various other internal and external alterations as part of refurbishment of existing building'.

Proposed Amendments

Active Cooling System

As you will be aware through recent pre-application engagement, it was originally anticipated the proposed residential dwelling would be cooled through natural ventilation (i.e. openable windows). However, our Client has undertaken a detailed overheating assessment which demonstrates that the proposed residential dwelling will not be sufficiently cooled through natural ventilation. The assessment concludes that a VRF cooling system will be required to ensure the dwelling does not overheat. The VRF cooling system comprises internal fan coil units connected to an externally mounted heat rejection condensing unit via a network of small bore refrigerant pipe work.

Relevant Planning Policy

London Plan Policy SI4 (Managing Heat Risk) sets out that major development proposals should demonstrate through an energy strategy how internal overheating of buildings and reliance on air conditioning systems is reduced in accordance with the following hierarchy:

1. Reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
2. Minimise internal heat generation through energy efficient design;
3. Manage the heat within the building through exposed internal thermal mass and high ceilings;
4. Provide passive ventilation;
5. Provide mechanical ventilation; and,
6. Provide active cooling systems.

Camden Local Plan (2017) Policy CC2 (Adapting to Climate Change) outlines that development proposals should adopt appropriate climate change adaptation measures such as reducing the impact of urban and dwelling overheating including application of the cooling hierarchy. The policy sets out that all new development will be expected to provide a statement demonstrating how the London Plan's cooling hierarchy has informed the building design. The policy states that active cooling will only be permitted where dynamic thermal modelling demonstrates there is a clear need for it after all of the preferred measures are incorporated in accordance with the cooling hierarchy.

Condition 5 Amendment

The provision of an active cooling system will require an amendment to the Sustainability Strategy approved under planning application **Ref. 2023/4236/P** which did not propose an active cooling system. Condition 5 associated with this planning consent states the following:

'Prior to occupation of the development, the applicant will have constructed and implemented all the measures contained in the Sustainability Statement prepared by Quinn Ross Energy, rev 1, reference P2787-SUS-01 and such measures shall be permanently retained and maintained thereafter. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems.'

Reason: In order to secure the appropriate energy and resource efficiency measures and on-site renewable energy generation in accordance with Policies G1, C1, CC1, CC2 and CC4 of the London Borough of Camden Local Plan 2017.'

An updated report has been prepared by RHB LLP outlining the requirement for mechanical cooling. The Report has considered the proposals in accordance with the cooling hierarchy outlined in Policy SI4 (Managing Heat Risk) of the London Plan (2021). The assessment has also considered guidance set out within the Historic England Document: Adapting Historic Buildings for Energy and Carbon Efficiency (July 2024).

The overheating assessment concludes, through detailed thermal modelling, that an active cooling system is required to ensure that the proposed residential dwelling does not overheat. The thermal modelling assessments and previously approved Sustainability Report by Quinn Ross Energy are appended to RHB's report. Accordingly, this application has been submitted to amend Condition 5. The suggested revised wording of Condition 5 is outlined below:

Condition 5 – Existing Wording	Condition 5 – Proposed Wording
<p><i>'Prior to occupation of the development, the applicant will have constructed and implemented all the measures contained in the Sustainability Statement prepared by Quinn Ross Energy, rev 1, reference P2787-SUS-01 and such measures shall be permanently retained and maintained thereafter. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems.'</i></p> <p><i>Reason: In order to secure the appropriate energy and resource efficiency measures and on-site renewable energy generation in accordance with Policies G1, C1, CC1, CC2 and CC4 of the London Borough of Camden Local Plan 2017.'</i></p>	<p><i>'Prior to occupation of the development, the applicant will have constructed and implemented all the measures contained in the Sustainability Statement prepared by Quinn Ross Energy, rev 1, reference P2787-SUS-01 RHB LLP, reference 4536/DH/MS, rev 4 and such measures shall be permanently retained and maintained thereafter. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems.'</i></p> <p><i>Reason: In order to secure the appropriate energy and resource efficiency measures and on-site renewable energy generation in accordance with Policies G1, C1, CC1, CC2 and CC4 of the London Borough of Camden Local Plan 2017.'</i></p>

Justification of Changes

The proposed changes to the planning application have been discussed through pre-application engagement. The approved principle of the scheme will remain unchanged, the amendment is considered to be de-minimus in nature and can therefore be dealt with through a Section 96a Non-Material Amendment application. We consider that the proposal complies with the following key tests of whether an alteration to a planning permission is considered to represent a Non-Material Amendment:

- Is the change material to any Development Plan policy? **Answer, no**
- Is the proposed change significant in terms of its scale in relation to the original approval? **Answer, no.**
- Would the proposed change result in a detrimental impact either visually or in terms of amenity? **Answer, no.**
- Would the interest of a third party or body that participated in or were informed of the original decision be disadvantaged in any way? **Answer, no.**

Related Planning Applications

A separate Full Planning and Listed Building Consent application has also been submitted for the Site in respect to external plant and minor design changes proposed to the building. This Full & Listed Building Consent application has been submitted under Planning Portal reference **PP-13683292**.

Conclusion

In addition to this Covering Letter, please find enclosed:

- Completed Planning Portal Application Form;
- Site Location Plan; and,
- Revised Sustainability Statement (prepared by RHB LLP).

The requisite fee of £293 plus the administration charge has been paid by BACS transfer to the Planning Portal. We trust that you find the attached application to be in order but should you require clarification of any element or any additional information then please do not hesitate to contact me.

Yours sincerely



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