

**80 GUILFORD STREET, LONDON,
WC1N 1DF**

**APPLICATION FOR PLANNING
PERMISSION AND LISTED
BUILDING CONSENT**

PLANNING STATEMENT

DECEMBER, 2013

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1.0 EXECUTIVE SUMMARY

1.1 This report has been prepared by Montagu Evans, to accompany an application for the refurbishment and change of use of 80 Guilford Street, WC1N 1DF (**Section 2**).

1.2 Planning permission and listed building consent are being sought for:

“Change of use from Nurses’ Hostel (Sui Generis) to Residential (Use Class C3) (3 x 1 Bedroom Flat & 2 x 2 Bedroom Flat) and associated internal and external alterations” (**Section 2**).

1.3 The purpose of this Statement is to provide a planning policy analysis of the proposed scheme in light of national, regional and local planning guidance (**Section 2**).

1.4 The proposed development will involve the following changes to the existing development:

- the conversion into residential use, reflecting the original purpose for which the building was originally built; and
- the refurbishment of a listed building, bringing it back into use and its likely subsequential removal from the English Heritage ‘Buildings at Risk Register’ (**Section 2**).

1.5 The Site is located in the Bloomsbury Conservation Area within the jurisdiction of the London Borough of Camden. The building is part of a group of properties (Nos. 75 to 82) listed as Grade II on 14 May 1974. They are also identified on the English Heritage Buildings at Risk Register (**Section 3**).

1.6 On 22 May 2013, planning permission (2012/6167/P) and listed building consent (2012/6219/L) was granted for:

“Change of use from Nurses’ Hostel (Sui Generis) to Residential (Use Class C3) (1 x 3 Bedroom Maisonette & 3 x 1 Bedroom Flat) and associated alterations, including removal of sub division walls” (**Section 4**).

1.7 In light of the planning permission granted in May 2013, we consider that the change of use to residential has been accepted in principle (**Section 4**).

1.8 **Section 5** sets out current and emerging planning policy as well as material considerations which are relevant to the assessment of the Site as suitable for the development described.

1.9 The main issues to be considered in respect of this proposal are:

- the quality of the residential accommodation and amenity of future occupiers;
- the effect of the development on neighbouring occupiers; and

- the effect of the development on the heritage value of the listed building and the Bloomsbury Conservation Area (**Section 6**).

1.10 The proposed scheme offers a significant number of benefits to the Site and the surrounding area by comparison to the existing vacant use. Specifically;

- a development which respects and acknowledges the heritage value of a listed building;
- the bringing back into use of a vacant building;
- a high quality residential development;
- high sustainability; and
- an improved perception of community safety (**Section 7**).

2.0 INTRODUCTION TO APPLICATION PROPOSAL

2.1 This report has been prepared by Montagu Evans, to accompany an application for the refurbishment, change of use and extension of 80 Guilford Street, WC1N 1DF.

2.2 Planning permission and listed building consent are being sought for:

“Change of use from Nurses’ Hostel (Sui Generis) to Residential (Use Class C3) (3 x 1 Bedroom Flat & 2 x 2 Bedroom Flat) and associated internal and external alterations.”

Applicant

2.3 The application is submitted on behalf of our Client, Russell Building and Developments Limited.

Purpose of the Planning Statement

2.4 The purpose of this Statement is to provide a planning policy analysis of the proposed scheme in light of national, regional and local planning guidance. The Statement sets out how the material considerations to the determination of the application have been taken into account.

2.5 The Planning Statement forms part of the supporting information which has been submitted for this application and is to be read in conjunction with the following documents:

- Schedule GS80-1 – Application Material Submitted (i.e. this Schedule);
- Application Covering Letter;
- Planning Application Form;
- Location Plan;
- Schedule GS80-2 – Drawings Submitted;
- Application Drawings;
- Planning Statement;
- Design & Access Statement;
- Heritage Statement;
- Air Quality Assessment;
- Noise Assessment;

- Daylight / Sunlight Assessment;
- Sustainability Statement;
- Third Floor Structural Report;
- Timber and Damp Survey; and
- Community Infrastructure Levy (CIL) Form.

2.6 The Planning Statement demonstrates that the proposed scheme:

- is in accordance with relevant planning policy at national, regional and local level and delivers sustainable development; and
- through the comprehensive refurbishment of this listed building, would deliver an appropriate alternative use and provide a high quality built conversion which is well-related to the surrounding context.

2.7 All the areas quoted in the Statement are in Gross Internal Area (GIA), unless otherwise stated.

Summary of proposals

2.8 Full details of the proposals are set out in the Design and Access Statement. We summarise these below.

2.9 The proposed development will involve the following changes to the existing building:

- the conversion into residential use, reflecting the original purpose for which the building was originally built; and
- the refurbishment of a listed building, bringing it back into use and its likely subsequential removal from the English Heritage 'Buildings at Risk Register'.

3.0 SITE & SURROUNDINGS

- 3.1 The site (hereby referred to as the 'Site') is located in the Bloomsbury Conservation Area within the jurisdiction of the London Borough of Camden. The site area is 164 sqm.
- 3.2 A full breakdown of areas (existing & proposed) is provided in the Design and Access Statement.
- 3.3 The building was developed in the mid 1790s by James Burton as part of the Foundling Hospital's Development of its Bloomsbury estate. The building is part of a group of properties (Nos. 75 to 82) listed as Grade II on 14 May 1974. The listing is for group value as they provide an uninterrupted row of eight terraced houses up to the junction with Grenville Street. They are also identified on the English Heritage Buildings at Risk Register.
- 3.4 A study of the history of the Site shows that the block of properties comprising 66-82 Guilford Street and 11-23 (odd numbers) Colonnade Mews were under the ownership of University College London Hospital until the early 1990s. After a reorganisation in the National Health Service during this time, the properties were transferred to the ownership of Great Ormond Street Hospital who occupied the building as nurses accommodation until the early to mid 2000s. At some point in the years since then, the buildings were sold and used unlawfully as House in Multiple Occupation (HMOs).
- 3.5 The building is currently vacant.
- 3.6 The Site is located in the Bloomsbury Conservation Area and within the Central Activities Zone (CAZ).
- 3.7 The Site has a Public Transport Accessibility Level (PTAL) of 6 which indicates excellent links to public transport.
- 3.8 Guilford Street is approximately 700 metres long running from Russell Square (A4200) to the west to Grays Inn Road (A5200) to the east.
- 3.9 There are a broad range of uses in the immediate vicinity including to the:
- North – residential use;
 - East – residential use;
 - South – Great Ormond Street Hospital; and
 - West – Student Accommodation.

4.0 SCHEME BACKGROUND

Planning History

4.1 The available planning history for the Site is limited and only dates back to 2002. This is summarised below.

4.2 In January 2002, full planning permission (PSX0204022) and listed building consent (LSX0204023) was sought for:

“Change of use and refurbishment of Nos. 66-67, 70-72, 75-82 to residential flats; demolition of 74 and rebuilding of 73-74 for use as C2 associated with Great Ormond Street Hospital.”

4.3 The application was withdrawn in 2004. According to the Officer’s Committee Report for a planning application (2011/6464/P) at 70-72 Guilford Street in 2011, the application was withdrawn by the Council because a legal agreement securing key worker housing was never completed.

4.4 In December 2007, full planning permission (2007/4153/P) and listed building consent (2007/4161/L) was sought at 80-82 Guilford Street for:

“Change of use from nurses accommodation and offices associated with hospital use, to house in multiple occupation (35 rooms).”

4.5 Both applications were withdrawn by the applicant on 20 February 2008. The reason for the withdrawal is unknown but it represents yet another failed opportunity to bring this listed building back into lawful use.

4.6 Recently, on 22 May 2013, planning permission (2012/6167/P) and listed building consent (2012/6219/L) was granted for:

“Change of use from Nurses’ Hostel (Sui Generis) to Residential (Use Class C3) (1 x 3 Bedroom Maisonette & 3 x 1 Bedroom Flat) and associated alterations, including removal of sub division walls.”

4.7 The Section 106 Agreement pertaining to the planning permission included a Construction Management Plan and a commitment by the owner to a Car Free Agreement.

The Proposal

4.8 The proposal seeks to build on the planning permission which was granted in May 2013 by increasing the number of residential units from four to five and making some internal and external alterations to improve the quality of accommodation.

4.9 The principle of the change of use to residential has already been established.

4.10 The proposed unit mix and location is noted in the Table 4.1 below.

FLOOR LEVEL	UNIT MIX
Basement	1 x 2 Bedroom Flat
Ground	1 x 2 Bedroom Flat
First	1 x 1 Bedroom Flat
Second	1 x 1 Bedroom Flat
Third	1 x 1 Bedroom Flat

Table 4.1: Proposed Unit Mix and Location

- 4.11 The frontal elevation of the building will undertake some alterations. Specifically, the external floor in front of the lightwell will need be lowered by approximately 200mm to form an adequate entrance threshold. Furthermore, the front wall of the third floor elevation will need to be rebuilt due to movement in some locations from the party walls (see Kirk Saunders Associates and Gulliver Timber Treatments ‘Timber and Damp Survey’).
- 4.12 The rear elevation will involve some changes in fenestration; particularly the existing basement rear window will be lowered and replaced with ‘French Doors’ which open out onto the rear light-well. The existing rear extension will also require replacement windows which face east onto the lightwell.
- 4.13 The lightwell will be remodelled with the access stairs from the ground floor removed and the existing steps remodelled to improve views from the back of the property.
- 4.14 At ground level, a new door is proposed at the rear of the existing ground extension which will give garden access to the ground floor flat. A small window and vent is also proposed for the en-suite bathroom. The existing door access to the garden will be removed with its associated stair and external landing and the door will be bricked up.
- 4.15 At first floor level, the existing roof terrace is to be reinstated for the use of the first floor flat.
- 4.16 The existing rear extension is in very poor conditions with widespread wood rot and water ingress through basement walls. Works will require tanking and the reconstruction of the ground floor and the roof. The material treatment of the extension will be in keeping with the local area with white painted render finish to match surrounding extensions.
- 4.17 Internally, the property has been substantially altered with many of the internal walls removed and replaced with lightweight partitioning. Nevertheless, it is proposed to

retain all existing features which are original. Indeed, the cornices, entrance hall features and fire places will be retained and restored.

- 4.18 All internal staircases will be retained except the existing stair which connects the basement and the ground floor. This will be enclosed and withdrawn from use but will be retained to enable potential future reinstatement.
- 4.19 At ground floor, a new draught lobby is proposed for the communal entrance hall with a glazed access door and overpanel.
- 4.20 At the first and second floor, a new wall will be inserted along the line of the existing partition to subdivide the front room into two and the entrance lobby will be adjusted accordingly.
- 4.21 At third floor level, the layout of the current consented scheme will be maintained, however, due to the poor state of the third floor and roof structure, much of it will need to be replaced (See Kirk Saunders Associates Third Floor Structural Report). As such, the proposal seeks to replace the timber beam with a steel beam and install new timber floor joists which would replace the existing.
- 4.22 The proposed necessary structural alterations to the third floor offer an opportunity to improve the quality of the accommodation on the third floor. Indeed, it is proposed to revise the roof structure and elevate the third floor ceiling level by approximately 220mm within the existing roof profile to achieve adequate ceiling levels. New roof lights facing into the valley gutter are proposed and will improve the quality of space and natural light in the flat. We note that the existing building already contains roof lights. The ceiling along the front elevation will retain a soffit margin to maintain a consistent external appearance.
- 4.23 An alternative proposal was to reconstruct the third floor approximately 200mm lower, however, this would require adapting the upper stair flight and would, in our opinion, cause harm to the listed building.

5.0 PLANNING POLICY CONTEXT

5.1 This section of the report considers the proposals in the context of adopted planning policy, and other relevant guidance.

Statutory Framework

5.2 Section 38 (6) of the Planning and Compulsory Purchases Act 2004 requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.

The Development Plan

5.3 In this case, the statutory Development Plan consists of the:

- London Plan (2011);
- Camden Core Strategy (2010); and
- Camden Development Policies Development Plan Document (DPD) (2010).

Material Considerations

5.4 The following material consideration have been consulted in the preparation of this application:

- National Planning Policy Framework (NPPF) (2012);
- Camden Planning Guidance (CPG) 1 (Design);
- CPG 2 (Housing);
- CPG 3 (Sustainability);
- CPG 6 (Amenity); and
- Bloomsbury Conservation Area Appraisal and Management Strategy (2011).

6.0 KEY PLANNING CONSIDERATIONS AND PRINCIPLE OF DEVELOPMENT

6.1 This section assesses the development against the policies and material considerations identified in **Section 5**.

6.2 The primary matters to be considered in respect of the proposal are:

- the quality of the residential accommodation and amenity of future occupiers;
- the effect of the development on neighbouring occupiers; and
- the effect of the development on the heritage value of the listed building and the Bloomsbury Conservation Area.

6.3 We consider that the change of use from nurses' accommodation to residential is acceptable in principle in light of the planning permission granted in May 2013 and in recognition that Camden consider housing as their priority land use.

The Quality of the Residential Accommodation and the Amenity of Future Occupiers

Housing Mix

6.4 Policy DP5 (Homes of Different Sizes) of the Development Policies DPD expects new development to contribute to the Council's Dwelling Size Priorities Table. The Table suggests there is a low demand for one bedroom units and very high demand for two bedroom units.

6.5 Nevertheless, the Council will take into account:

"c) the character of the development...

d) site size, and any constraints on including homes of different sizes; and

e) the economics and financial viability of the site, including the demand for homes of different sizes."

6.6 Indeed, whilst an effort has been made to contribute towards Camden's dwelling size priorities i.e. through the provision of two, two bedroom flats, the constraints of the listed building afford it difficult to provide larger dwellings. Indeed, it would be difficult to provide flats larger than one-bedroom on the first, second and third floor of the building without extending the envelope of the building. Notwithstanding this, we consider that the location of the Site and the character of the surrounding area is more suited to one bedroom units.

Floorspace Standards

6.7 CPG 2 (Housing) sets minimum floorspace standards for self-contained dwellings. Table 6.1 demonstrates that each unit comfortably exceeds the Council's minimum standards and Mayoral Floorspace Standards set out in the London Plan.

UNIT	CPG 2 (HOUSING) MINIMUM FLOORSPACE STANDARDS	LONDON PLAN MINIMUM FLOORSPACE STANDARDS	PROPOSAL
80 A (1 X 2 BED)	48	61	124.5
80 B (1 X 2 BED)	61	61	100.6
80 C (1 X 1 BED)	48	50	79.6
80 D (1 X 1 BED)	48	50	65.8
80 E (1 X 1 BED)	48	50	65.8

Table 6.1: Each unit's proposed floorspace compared against Camden and Mayoral Guidance

Lifetime Homes

6.8 Policy DP6 (Lifetime Homes and Wheelchair Housing) of the Development Policies DPD states:

"All housing development should meet lifetime homes standards. 10% of homes developed should either meet wheelchair housing standards, or be easily adapted to meet them."

6.9 Where possible, efforts have been made to comply with the sixteen point checklist of the Lifetime Homes Assessment. However, due to the existing building constraints, some of the criteria are not possible to achieve without significantly altering the original layout of the listed building. Where this has been the case, a balanced view has been formed which has judged the requirement to comply with the Lifetime Homes Assessment against the significance of the heritage asset.

Transport

6.10 Policy DP18 (Parking Standards and Limiting the Availability of Car Parking) of the Development Policies DPD sets a standard of one cycle space per residential unit.

6.11 The proposal complies with the Policy by allocating six secure cycle spaces (more than one for each unit) located in the vaults of the building.

6.12 The development will be car-free.

Refuse Storage

- 6.13 Policy CS18 (Dealing with Our Waste and Encouraging Recycling) of the Core Strategy states that the Council will:

“make sure that developments include facilities for the storage and collection of waste and recycling.”

- 6.14 Located in the vaults, the proposal seeks to provide 920 litres of waste storage separated for refuse and recycling.
- 6.15 It will be the responsibility of the occupiers to transport the bins to street level on waste collection days.

Daylight / Sunlight

- 6.16 Policy DP26 (Managing the impact of development on occupiers and neighbours) of the Development Policies DPD seeks to ensure that the quality of life of future occupiers in respect of amenity is not harmed.
- 6.17 A Daylight/Sunlight Assessment has been conducted by Hawkins Environmental Limited and has been submitted as part of this application.
- 6.18 The Report has shown that most of the rooms within the basement meet the good practice guidelines on levels of internal daylight with the exception of the living room / kitchen.
- 6.19 However, it is essential to note that failure to meet the guideline criteria is not an indicator as to whether development is acceptable in planning terms. Moreover, one must acknowledge that the form and density of the surrounding area (i.e. in Central London) afford the prospects of meeting the BRE guidance to be sometimes unachievable.

Noise

Policy DP28 (Noise and Vibration) of the Development Policies DPD states the Council will not grant planning permission for:

“a) development likely to generate noise pollution; and

b) development sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided.”

- 6.20 A Noise Assessment has been conducted by Hawkins Environmental Limited and has been submitted as part of this application.
- 6.21 The Report concludes that noise from the adjacent road results ensures that the Site falls within Noise Exposure Category C and therefore attenuation must be provided.

- 6.22 Through the provision of a good quality acoustic standard primary double glazed window unit, with the provision of ventilation, a reasonable internal noise environment can be achieved.
- 6.23 Therefore, the noise environment of the site should not be a constraint on the proposed residential development.

Air Quality

- 6.24 Policy DP32 (Air Quality and Camden's Clear Zone) of the Development Policies DPD states:

"The Council will require air quality assessments where development could potentially cause significant harm to air quality. Mitigation measures will be expected in developments that are located in areas of poor air quality."

- 6.25 An Air Quality Assessment has been conducted by Hawkins Environmental Limited and has been submitted as part of this application.
- 6.26 The Report predicts that the National Air Quality Objectives (NAQO) will not be exceeded at the Site, with the exception of Nitrogen Dioxide (NO₂) levels. Unfortunately, since the background concentrations exceed the NAQO in the vicinity of the development site, it is not possible to mitigate the effects of NO₂ by taking cleaner air from elsewhere on site.
- 6.27 However, as the proposed development will result in a smaller population than the existing land use, it will result in fewer people being exposed to levels of nitrogen dioxide in excess of the NAQO.
- 6.28 Additionally, as the proposal is car free, the development related traffic generation onto the local traffic network will have a "Negligible" impact on air quality for occupiers of existing local residential property.

Energy

- 6.29 Policy DP22 (Promoting Sustainable Design and Construction) of the Development Policies DPD requires development to incorporate sustainable design and construction measures. For refurbished buildings, the Policy expects developments of 5 or more units to meet 'excellent' in EcoHomes Assessments from 2013.
- 6.30 We note that EcoHomes Assessment has since been superseded by BREEAM Domestic Refurbishment
- 6.31 A Sustainability Statement has been produced by XC02 Energy and has been submitted as part of this application.
- 6.32 The report concludes that the proposed development achieves 72.45 credits, which exceeds the required 70 credits for BREEAM Domestic Refurbishment 'Excellent'.

The Effect of the Development on Neighbouring Occupiers

6.33 Policy DP26 (Managing the Impact of Development on Occupiers and Neighbours) of the Development Policies DPD states that in the determination of applications the Council will consider the following:

- a) visual privacy and overlooking;*
- b) overshadowing and outlook;*
- c) sunlight, daylight and artificial light levels;*
- d) noise and vibration levels;*
- e) odour, fumes and dust;*
- f) microclimate;*
- g) the inclusion of appropriate attenuation measures.”*

6.34 As the proposal does not seek to extend the existing building line, we consider that that the development will not have a detrimental impact upon visual privacy and overlooking of neighbouring residents / occupiers on Colonnade Mews. Indeed, there are no direct southerly facing windows opposite the Site (see Photograph 6.1).



Photograph 6.1: Existing rear extension of Site and its relationships with Colonnade Mews

6.35 The Applicant is willing to accept a Construction Management Plan secured by condition or S106 Agreement to ensure that noise and vibration levels and odour, fumes and dust are considered and attenuated during construction.

The Effect of the Development on the Heritage Value of the Listed Building and the Bloomsbury Conservation Area.

6.36 Policy DP24 (Securing High Quality Design) states the Council will require all developments, including alterations and extensions, to consider the following:

“a) character, setting, context and the form and scale of neighbouring buildings;

b) the character and proportions of the existing building, where alterations and extensions are proposed;

c) the quality of materials to be used.”

6.37 Furthermore, Policy DP25 (Conserving Camden’s Heritage) of the Development Policies DPD states the Council will:

“f) only grant consent for...alterations to a listed building where it considers the this would not cause harm to the special interest of the building.

g) not permit development that it considers would cause harm to the setting of a listed building.”

6.38 Chapter 12 of the NPPF provides the national planning policy on the historic environment, and is of significant weight as a material consideration. Paragraph 131 is relevant to this application. Specifically:

“When determining applications local planning authorities should take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, the positive contribution that the conservation of heritage assets can make to sustainable communities and economic viability and the desirability of new development making a positive contribution to local character and distinctiveness.”

6.39 In our view, whilst the proposal involves a refurbishment of the listed building, the bringing back into use of a listed building for its original intended purposes and its removal from the Buildings at Risk Register will outweigh any perceived harm to it.

6.40 The (re)conversion of the property to a residential use will reinstate its original use, thus sustaining and enhancing its significance and better revealing this significance.

6.41 At the front, the external work is limited to bringing the building into good repair, which will benefit the property and will also enhance the Bloomsbury Conservation Area by returning this property to a good standard of maintenance.

6.42 At the rear, the proposed rebuilding of the existing extension is necessary due to its poor state of repair and the removal of the external staircase will improve the visual appearance of the rear elevation.

- 6.43 Minor alterations such as the inclusion of 'French' Doors at basement level and a new door at ground floor level will allow residents access to the garden which can only help improve the visual appearance and upkeep of the garden.
- 6.44 Internally, the proposed structural interventions are minor, and are mainly limited to removing inserted walls and other minor changes associated with making the property work for 21st-century living.
- 6.45 The proposed structural works to the third floor are necessary in recognition of the poor state of the timber beam and timber floor joists/ The new roof, built within the profile of the existing roof, will bring the flat into a habitable state whilst maintaining the character of the listed building.
- 6.46 Crucially, the retention and restoration of original features, notably the entrance hall features, fireplaces and the cornices will ensure that the property's history and date are clearly legible internally.
- 6.47 Therefore, in our view, the proposed development meets the tests set out in the NPPF by "sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation".
- 6.48 Furthermore, we consider that the proposal complies with Policy DP24 (Securing High Quality Design) and Policy DP25 (Conserving Camden's Heritage) of the Development Policies DPD.

7.0 SUMMARY & CONCLUSIONS

- 7.1 This application represents a significant improvement to the existing vacant use of the site.
- 7.2 The scheme represents a number of significant improvements on the existing building.
- 7.3 The proposed use offers a significant number of benefits to the site and surrounding area by comparison to the existing building.
- 7.4 We highlight some of these benefits below:

A development which respects and acknowledges the heritage of a listed building.

- a sensitive design which improves the functionality of a listed building whilst maintaining its original features; and
- the removal of the building from the 'Buildings at Risk Register'.

The bringing back into use of a vacant building.

- the bringing back into use of a vacant building after a period of uncertainty characterised by unlawful use as a HMO.

A high quality residential development.

- high quality housing which meet and exceed minimum floorspace standards and contribute to meeting Camden's housing demand.

High Sustainability

- BREEAM Domestic Refurbishment 'Excellent' Rating at pre-assessment stage.

An improved perception of community safety.

- the conversion of a vacant, decaying building to a number of residential units will intensify the use of the buildings day and night, therefore presenting a safer and more secure environment.

