



115 Patrick Coman House
St John Street
London
EC1V 4NE

Development Management
Conservation & Heritage Department
London Borough of Camden
Camden Town Hall Extension
Argyle Street
London
WC1H 8EQ

8th February 2013

Dear Conservation & Heritage Team,

Listed Building Application for Internal Works at No. 63 Grays Inn Road, A Registered House of Multiple Occupation (HMO)

Acting on behalf of the client, Flat Out Ltd, Design Company Group Architects and the Town Planning Company (UK Ltd) seek to apply for listed building consent for multiple interior building alterations proposed to take place at No. 63 Grays Inn Road, London, WC1X 8TL.

The application seeks to address recent correspondence from Conservation and Heritage services (dated 20th November, 2012), deeming the client team's original application for listed building consent as invalid (original submission package submitted on the 16th of November 2012).

Further information was required in order to validate the application (Heritage Statement was requested) and the Listed Building Application was confused as being a proposal full planning permission.

You will be aware of the delayed notification of the invalidity of the original application due to a clerical error (on the Council's behalf) submitting notification to an incorrect client team e-mail address, as such; it has taken until now to rectify such issues and to reapply with the appropriate submission package.

The revised application submission package comprises of:

- Listed Building Application Forms dated February 2013;
- Site Block Plan (795-02);
- Existing Plans provided by Design Company Group (795-01);
- Proposed Plans provided by Design Company Group (795-03);

- Heritage Report, published by Martin O' Rourke -Independent Heritage Consultant (former Historic Buildings Inspector and Regeneration Advisor for the London Region of English Heritage and former consultant for GLC Historic Buildings Division) -Diploma in Environmental Design and Master of Art at The Royal College of Art;
- Schedule published by Flat Out Ltd listing existing original building features and defects, proposed alterations/amendments and all safeguards to protect or restore old heritage features of the listed building (report supplemented with photographic survey);
- Schedule published by architect, Design Company Group on Proposed Doors and Windows.

Site Location & Description

The site is located in the London Borough of Camden at the heart of London's business, hotel and university quarter. Within the Bloomsbury Conservation Area (Sub Area 10: Great James Street/Bedford Row) the site is positioned on the southern most section of the Borough on the southern part of Grays Inn Road, strategically positioned north of Central School of St Martin's College and the LSE university campus, east of University College London and the main University College Hospital estate.

Local transport networks servicing the site include the central line at chancery lane (within 5 mins walk-south of the site) and the 17, 45, 46, 63, 38, 19, 243, 55 and 341 bus networks -linking the site to London Bridge, Waterloo, Kings Cross, Oxford Circus as well as Finsbury Park, Victoria and East London.

Local Context

Grays Inn Road is described as being a significant tree-lined avenue with wide pavements, slightly sloping down towards the junction with Theobalds Road.

The street layout reflects a pattern representative of the Georgian and Regency period, a grid iron template adopted. The grid plan incorporates a regular building line in a tight block pattern.

Local uses largely comprise of retail units, offices, residential accommodation and public/private education uses.

Open spaces in the vicinity include Grays Inn Square (with its associated law chambers) to the south, the privately accessed gardens of Meckleburgh and Corum's fields to the north and the public accessed gardens of St Andrews and Brunswick Square to the north-west.

The Building

Aesthetically & Structurally

The building has been defined as forming part of a group of 4 terraced houses, built circa 1791 with later shop additions added. The properties were later listed in December 1999 as a group and defined as being:

Multi-coloured stock brick with some patching and refacing. Slated mansard roofs with dormers. 3 storeys, attics and basements. Later C20 shopfronts. Upper floors have gauged brick flat arches to

recessed sashes; 1st floor set in shallow round-arched recesses linked by stucco impost bands. Parapets, Nos 63-67 with brick cornices below.

English Heritage Listing Information, December 1999

Current and Historic Use

In terms of building use, the site has been registered and reconfigured as a HMO in excess of 10 years. Its use as a HMO pre-dates the date of listing (30th December 1999).

Planning History

The planning history indicates how the site has had the benefit of various planning permissions including the benefit of multiple self contained flats, retail usage at ground and basement level and proposals to gain roof and full height rear extension.

Date	Planning Reference	Description	Permitted
30/11/1968	6280	The conversion of No. 63 Grays Inn Road, Camden to provide a self- contained flat on each of the 1st, 2nd and 3rd floors, together with the erection of a three storey rear extension.	Approved
27/01/1967	3164	Conversion of upper part of 63 Grays Inn Road, Camden, to provide three self-contained flats.	Approved
25/09/1970	9725	Installation of new shop front at 63 Grays Inn Road, Camden.	Approved
29/06/1979	28760	The covering over of the open yard at the rear of number 63 Grays Inn Road with glazed roof.	Approved
15/10/2001	PSX0104945	Application for Certificate of Lawfulness for the existing use of the ground floor of the premises within use class A1 (retail), as shown on drawing numbers: Location Plan and Un-numbered A4 plan of ground floor.	Approved
15/11/2006	2006/5154/P	Submission of details of method of storage and waste removal pursuant to condition 3 of retrospective planning permission dated 4th August 2006 (ref. 2006/2066/P) (for the change of use of the basement and ground floors from retail/sandwich bar (Class A1) to restaurant/cafe (Class A3) with no primary cooking).	Approved
15/06/2006	2006/2066/P	Retrospective application for the change of use of the basement and ground floors from retail/sandwich bar (Class A1) to restaurant/cafe (Class A3) with no primary cooking.	Approved

The proposals:

The full details of the application proposals (and elements to be safeguarded) are provided in the application forms, the schedule listed by the owner/developer providing comprehensive details of the existing, proposed and safeguarded assets and in the proposed window and door schedule provided by the architect.

In terms of a full overview of works, they are as follows:

- Chimney Breasts –the proposals seek to mimic development already undertaken in the top two floors of the building where the internal structure of the chimney breasts have been

removed. The chimney breasts are proposed to be removed from the first and second floors in order to improve the quality of accommodation for the bedsits (wider social benefit-which is a material planning consideration to be taken into account when weighing up decisions¹).

It must be noted that the external chimney breast is *not* to be altered;

- Doors- modern doors internal to the property (installed pre-1999, when the property was listed) are being replaced like for like. The modern external front entrance (non-original to the building) is also to be replaced like for like;
- Wall partitions- seek to pull down existing internal modern stud wall partitions and to erect new, improved layouts, which will not intrude with listed building features (stud walls were in situ pre- listing date);
- Floors- seek to sound proof and insulate the original wooden floors and protect them with fire proofing and overlay (in keeping with English Heritage Guidance)²;
- Original ornamental features- proposals seek to safeguard original coving where found on the property;
- Services and Amenities- seek to modernize existing bathrooms, kitchens, water supplies and central heating provision (improve facilities that already exist);
- Windows- all external UPVC and wooden windows on front and back facades to be installed in the property (pre-dating property listing) are to be replaced like for like, with historically sensitive designs offering an improvement to existing front and back facades, plus, new roof lighting proposed to be installed in line with English Heritage conservation guidance rules.³

In Support of Proposals:

In support of the proposals, the client team believe both heritage and wider housing policy should be taken into account when reviewing the application for listed building consent:

- Historic environmental records have been consulted and independent heritage expert advice given⁴ in relation to proposals put forward (in line with national heritage guidance para 128 of **NPPE**, 2012);
- Alterations are predominantly internal, therefore less of a wider impact on the conservation area as a whole (in line with **Bloomsbury Conservation Area Audit**, 2011);
- Alterations to the external facade proposed (windows/doors) are non-historic additions installed pre-property listing (1999), therefore, in keeping with wider heritage and planning guidance they may be exchanged like for like (**Retrofitting Planning Guidance**, June 2011 and DP25 (e) of **Camden Development Policies**, 2010);
- Development proposals issue “less than substantial” harm to the building, where a wider assessment has been made as to the wider public benefit the proposals would bring to the viability and quality of the building as a HMO facility (in line with national policy guidance, para 134, **NPPE**, 2012 and **London Terrace Houses, 1660-1860- A guide to Alterations and Extensions**, page 7, 1996);
- Low key localised techniques of repair and alteration are allowed in listed buildings, where proposals seek to replace non-old features like for like (i.e. windows/internal features), and

¹ Paragraph 134, **NPPE**, 2012

² **London Terrace Houses, 1660-1860- A guide to Alterations and Extensions**, page 12, (1996);

³ **London Terrace Houses, 1660-1860- A guide to Alterations and Extensions**, page 10 (1996);

⁴ Martin O Rourke Heritage Specialist

older/original features with textures, colours and materials akin to the building's historic vernacular (London Terrace Houses, 1660-1860- A guide to Alterations and Extensions, page 10, 1996);

- Roof lighting is allowed on roofs which are hidden and out of public display, are out of sight and not on principal roof slopes, provided that traditional rectangular designs fitted flush to the roof slope are used (London Terrace Houses, 1660-1860- A guide to Alterations and Extensions, page 10, 1996);
- Upgrading of floors (thick underlay and carpet) and insulation of existing wall partitions and flooring for acoustic insulation and resistance is allowed so long as original fabric remained unharmed in the process (London Terrace Houses, 1660-1860- A guide to Alterations and Extensions, page 12, 1996);
- The proposals seek to make the property more energy efficient in line with English Heritage Good Practice Guidance(Retrofitting Planning Guidance, June 2011);
- Proposals are in keeping with wider heritage guidance which advocate property services are to be confined in ways that do not issue a visual impact on the front of the property(London Terrace Houses, 1660-1860- A guide to Alterations and Extensions, page 13, 1996);
- The listed building application seeks to maintain and maximise the supply of ongoing provision of housing for the borough, to enable the fulfilment of the council's housing target of 5,950 homes to be delivered for 2007-2017, offering a wider choice of affordable housing for London's housing market for student living (in line with policy CS6 of Camden's Core Strategy, 2010);
- Shared accommodation and HMO's are strategically an important part of London's housing offer, meeting distinct needs and reducing housing pressure on existing stock (as supported by para 3.55 of the London Plan, 2011 under policy 3.8 relating to "Housing choice");
- The proposals seek to retain a housing asset which promotes for a wider housing mix and encourages balanced mixed communities (in line with policy 3.11 of the London Plan, 2011);
- The maintenance and enhancement of London's existing homes is encouraged in the London Plan (in line with policy 3.14 a, London Plan 2011), where floorplan expansion and improvement is openly advocated at regional planning policy level (policy 3.14 c, London Plan, 2011);
- Camden council support the protection and enhancement of housing units with shared facilities (in line with DP2 and DP4 of Camden Development Policies, 2010) and support shared facility bedsit/ student accommodation which seek to improve HMO standards, especially those which offer good access to transport networks, are in sustainable distances to work, shops and services, are within close proximity to the education institutions in which they serve and where the local environment is not oversaturated with similar uses (in line with DP9 of Camden Development Policies, 2010);
- The proposals are sympathetic to the building as at listing date, the works proposed seek to maintain or improve the HMO facility (like for like improvement, or improvements proposed are deemed of a wider public benefit/exceptional circumstance to improve quality of housing on the London housing market) in line with national and local planning policy (Retrofitting Planning Guidance, June 2011 and DP25 (e) of Camden Development Policies, 2010);

- Proposals in line with retrofitting guidance (**Retrofitting Planning Guidance**, June 2011), where full planning permission is not required for internal alterations of grade II listed buildings within Conservation Areas, where like for like improvements are allowed on non-modern features (glazing, stud wall partitions, servicing to the building), floor insulation is encouraged for energy efficiency.

To conclude, we hope the conservation team have enough information to make an informed decision about the client team's proposals. What should be of note, is that the proposed works are within the confines of an already permitted facility (HMO registered and set in place in excess of 10 years); the redesigns are to make an existing HMO (that is in poor state of repair and had been considerably reconfigured as a result of pre-listing alterations made pre-1999, which is the date of listing) of improved quality; there is a trade off to some degree between the loss of already altered non-operational internal chimney breast for the wider good of better student living space (a social good), which should be weighed in the balance when making decisions (as acknowledged in wider planning guidance⁵); the building is not totally intact with original features both internally and externally as a heritage asset as it was only listed in 1999; non original features are to be replaced like for like; while the application provides proposals to safeguard and protect original features within the building such as coving and flooring.

Should you need anything further, please get in touch with the agent listed on the planning forms.

The team look forward to working in collaboration with you.

Kind Regards,

Anna Gavriel BA MA Mphil MRTPI

Director of the Town Planning Company
Agavrieltheplanningco@hotmail.co.uk
Mobile: 07 94 99 10 734

⁵ ra 134, **NPPE**, 2012 and