

Heritage, Design & Access Statement

68 and 69 Guilford Street London WC1

December 2011



Existing facade

- Poor quality brickwork
- Oversized 2nd floor windows
- Replacement windows
- Stucco banding removed



Retrospective works to front facade

- Cornice repaired
- Windows replaced to match terrace
- Brickwork worked repaired
- Balcony repaired
- Banding reinstated
- Railings repaired

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1. Introduction

- 1.1 This report accompanies planning permission and listed building consent application is submitted on behalf of Cignia UK Properties Ltd for the Change of Use from mixed (nurses accommodation) and B1 (Office) to Sui Generis (House of Multiple Occupancy (HMO) and associated refurbishment and alterations at 68 and 69 Guilford Street London WC1N 1DD .
- 1.2 The Project will comprise the internal re-modelling of the 68-69 Guilford Street, London, to form 39 HMO rooms with shared kitchen facilities. The buildings are listed and have been on the Buildings At Risk Register since 2002. Both properties are presently dilapidated and in need of considerable repair and maintenance. The scope of work includes complete total refurbishment of the property including restoring the front façade so they can be brought back into active use.
- 1.3 The proposed accommodation meets Camden HMO standards and will be let to lower paid workers and young professionals who require affordable private sector rented accommodation.
- 1.4 The ground floor of 69 Guilford Street contains a self-contained flat occupied by an existing assured tenant since 2001. The flat will be retained and refurbished as part of the works.
- 1.5 The work has commencement on site and is due for completion at the beginning of 2012.

2. Site Description

2.1 The site consists of two laterally converted mid-terrace grade II listed Georgian properties comprising ground plus 3 upper floors, basement and later attic storey. The site is located on the north side of Guilford Street opposite the entrance to Queens Square within the Bloomsbury Conservation Area. The properties were built as a single family dwelling in the late 18th Century by James Burton. They were listed in 1974. The list description reads:

"3 terraced houses. c1793-1799 by James Burton. No.67: darkened multi-coloured stock brick, 3rd floor refaced. Rusticated stucco ground floor. 4 storeys and basement. 3 windows. Round-arched, recessed entrance with overlight and part glazed door. Gauged brick flat arches to recessed sashes, mostly with original glazing bars; 1st floor with continuous cast-iron balcony. Stucco 3rd floor sill band. Parapet. Nos 68 & 69: yellow stock brick with stucco ground floor. stucco cornice at 3rd floor level. Formerly 2 residences, No.68, 4 windows; No.69, 3 windows. Entrance in No.69, round-arched with fluted surround, side panels, radial fanlight and panelled double doors. No.68 former entrance converted for use as a window. Red gauged brick flat arches to recessed sash windows; 1st floor with cast-iron balconies, No.69 2nd floor also. No.69 with blind boxes to 1st and 2nd floor windows. Parapets. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas. (Survey of London: Vol. XXIV, King's Cross Neighbourhood, Parish of St Pancras IV: London: - 1952: 32)."

2.2 The properties were converted several years ago into a combined building for institutional use. It is unknown when the properties were laterally converted however historic planning records states they were known as 68-69 in 1963 prior to being listed in 1974¹. Secretary of State for Health owned the building until 1996 when it was passed to University College Hospital NHS Foundation Trust (UCLH) in 2004, who owned it until 2010.

2.3 The exact use of the properties is unclear but records indicate the last known use was nurses' residential accommodation to 1st 2nd and 3rd floors with ancillary administrative offices on ground and basement of 68 Guilford Street² The ground floor of 69 contains a self-contained flat which

¹ Planning ref: TP4516 dated 14th February 1963.

² Planning ref: HB/9370077/R2 dated 3rd June 1994

as been occupied by an assured tenant since 12th February 2001 (The flat will remain as part of the proposed works).³

2.4 The property was acquired by Cignia UK Properties Ltd in September 2010. When purchased the buildings were in a very poor structural state and state of repair owing to lack of maintenance and intermittent occupation in recent years. The properties have been on the register of Buildings at Risk since 2002.

2.5 Externally the front and rear facades are in a poor state of repair. The sash windows to ground and upper floors are in poor condition, or missing and boarded up. Some windows at the rear are UPV and there are a number of different pane configurations.

2.6 Internally the buildings have been variously altered and subdivided creating multiple rooms per floor with centrally corridor connecting the two-properties. Little of historic interest, including the historic layout, remains internally. This is consistent with many of the properties along the terrace, which have been erroneously altered and poorly maintained when in ownership by the UCLH as nurses accommodation.

³ Please refer to Letter from UCLH to Cignia Uk Properties dated July 2010 (appendix 1.)

3. Policy

3.1 The relevant policies that would apply to this proposal are taken from the London Borough of Camden Local Development Framework (Core Strategy and Development Policy documents) as adopted on 8th November 2010 and the revised London Plan July 2011.

3.2 LDF Core Strategy and Development Policies (November 2010)

Core Strategy

CS1 – Distribution of growth

CS5 – Managing the impact of growth and development

CS6 – Providing quality homes

CS8 - Promoting a successful and inclusive Camden economy

CS9 - Achieving a Successful Central London

CS11 – Promoting sustainable and efficient travel

CS13 – Tackling climate change through promoting higher environmental standards

CS14 - Promoting high quality places and conserving our heritage

CS18 - Dealing with our waste and encouraging recycling

Development Policies

DP1 – Mixed use development

DP2 – Making full use of Camden's capacity for housing

DP4 – Minimising the loss of affordable homes

DP6 – Lifetime Homes and Wheel chairs

DP9 - Student housing, bedsits and other housing with shared facilities

DP13 - Employment sites and premises

DP18 - Parking Standard

DP22 - Promoting sustainable design and construction.

DP24 – Securing high quality design

DP25 – Conserving Camden's heritage

DP26 – Managing the impact of development on occupiers and neighbours

London Plan

3.3 The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. It was adopted in July 2011 replacing the London Plan (consolidated with alterations since 2004 which was published in February 2008.) The relevant chapters include:

Chapter 3 London's People

- 3.3 Increasing Housing Supply
- 3.4 Optimising Housing Potential
- 3.5 Quality And Design Of Housing Developments
- 3.10 Mixed And Balanced Communities
- 3.11 Definition Of Affordable Housing
- 3.12 Affordable Housing Targets
- 3.15 Existing Housing

Chapter 7 London's Living Places

- 7.4 Local Character
- 7.6 Architecture
- 7.8 Heritage Assets And Archaeology
- 7.14 Improving Air Quality

3.4 The LDF is accompanied by the 'Camden Planning Guidance' (CPG) which was adopted in April and September 2011.

Camden Planning Guidance (2011)

- Camden Planning Guidance (CPG 1) - Design (2011)
- Camden Planning Guidance (CPG 2) – Housing (2011)
- Camden Planning Guidance (CPG 3) – Sustainability (2011)
- Camden Planning Guidance (CPG 5) – Town Centres, Retail and Employment
- Camden Planning Guidance (CPG 6) – Amenity (2011)
- Camden Planning Guidance (CPG 7) – Transport (2011)

3.5 Other Supplementary Planning Guidance includes

Bloomsbury Conservation Area Appraisal and Management Strategy
Adopted April 2011

Planning Policy Statement 5: Planning For The Historic Environment

March 2011

4. Land use – The principle of the development

Loss of Office/Storage

- 4.1 The proposal has been considered in the context of Core Strategy policy CS8, Development Policy DP13 and CPG5 Town Centres, Retail and Employment (approved for adoption on 7 September 2011).
- 4.2 The proposal results in the loss of approximately 320 sqm of office (Class B1) floorspace (part ground and lower ground floors) that was ancillary to the use of the primary use of the building as nurses accommodation and therefore requires assessment under policy DP13.
- 4.3 This policy states that development will be resisted that involves the loss of business use on a site where there is potential for that use to continue. When a site is not suitable for continuation of other business use, other than office, the Council may allow an exception to this approach where the change of use is to permanent residential or community uses (DP13a).
- 4.4 In terms of retention, the existing office space is likely to only be suitable for office purposes, rather than other industrial use designations, as it does not have features that would create flexibility for other business uses, e.g. level access or off-street loading. Furthermore the properties were not originally designed for office space and are restricted in their flexibility due to them being listed buildings. It is also considered that the retention of such a mix would not assist restoration of the properties or natural surveillance of the street.
- 4.5 The current supply of office space is thought to be plentiful, and there is no reason to suppose that the loss of this office space would put pressure on other land uses.
- 4.6 The loss of office accommodation and storage areas has been accepted by the Council for these reasons on the adjacent site at 74-76 Guilford Street as part of the planning permission approved on 22nd June 2010 (ref: 2010/0885/P). Given the aforementioned policy considerations the

potential loss of this employment floorspace is not considered to conflict with the Development Plan policy.

Loss of nurses' accommodation

4.7 From the planning history that can be identified, it has been ascertained that the application site was previously used as a type of key-worker accommodation for nurses. The supporting text for policy DP4 - Minimising the loss of affordable homes - discusses the role of nurses' accommodation as making an important contribution to the stock of affordable housing in the borough.

4.8 The supporting text acknowledges that nurses are no longer employed by NHS hospitals during their undergraduate training, and are not eligible for key-worker housing while they are students; and a number of hospital trusts have arranged for their staff to have access to new Housing Association homes.

4.9 As such the nurses' accommodation provided on site is now surplus to requirements by the Hospital Trusts. This is confirmed in writing by UCLH in July 2010⁴. Given the long-term vacancy of the properties, the fact that the nurses accommodation is now provided elsewhere, the proposal is not considered to conflict with Policy DP4 or London Plan Policy 3.15C which states that 'the loss of [should be resisted], unless the existing floor space is satisfactorily re-provided.'

Provision of House of Multiple Accommodation

4.10 Policy CS6 supports the increase in residential accommodation and housing is the priority use of the LDF. As such the Council will look favorably on schemes for residential development conversions and extensions that provide accommodation to an acceptable standard.

4.11 Policy DP2 expects 'the maximum appropriate contribution to supply of housing on sites that are underused or vacant.' Given the proposal seeks to provide high quality affordable units by substantially refurbishing

⁴ Please refer to Letter from UCLH to Cignia Uk Properties dated July 2010 (appendix 1.)

a building at risk, which has underused and poorly maintained for many years, these policies are particularly relevant to this application.

4.12 London Plan policy 3.15B states that the loss of housing, including affordable housing should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace. The proposal will create additional residential living space at an affordable level in the private rented sector with higher densities than previously exists and of a much higher standard.

4.13 Furthermore, policy DP9 states that the Council will support development of housing with shared facilities subject to the following criteria being met:

	Policy statements	Response
a	Will not involve the loss of permanent self-contained homes	<i>The proposal will not result in the loss of permanent self-contained homes.</i>
b	Will not prejudice the supply of land for self-contained homes	<i>The site is currently has a lawful use as a type of affordable shared accommodation. The proposal would retain an affordable rented</i>
c	Does not involve the loss of sites or parts-of-sites considered particularly suitable for affordable housing	<i>accommodation on the site, albeit of a different type and would not prejudice the supply of self-contained housing.</i>
d	Complies with any relevant standards for houses in multiple occupation (HMOs);	<i>The proposal would comply with HMO standards, please refer to section 5.</i>
e	Will be accessible to public transport, workplaces, shops, services, and community facilities;	<i>The site is highly accessible site with a PTAL rating of 6a</i>

f	Contributes to creating a mixed and inclusive community; and	<i>The area comprises a diverse mix of uses including: private and social rented residential units; student housing; hotels; offices and institutional uses. The immediate the group of buildings, which form part of Guilford Terrace, includes a hotel, student accommodation and unlicensed HMO's</i>
g	Does not create an over-concentration of such a use in the local area or cause harm to residential amenity,	<i>which we understand the Council have served notices on requiring them to be converted to residential accommodation. As such the proposal would add to the diversity in the area and not result in over concentration of HMO accommodation in the area.</i>

4.14 The development is not considered to represent an unacceptable concentration of accommodation, having regard to the above and the fact that the locality is a mixed-use area adjacent to a healthcare institution, close to good public transport links.

4.15 This development would not result in identifiable physical harm to the housing mix in the area or harm the overall social balance of the wider community, given the current variety of uses which can be found on Guilford and its environs. Furthermore, as the site is at the periphery of the residential neighbourhood.

4.16 The proposal also complies with policy CS5 which seeks sustainable buildings and spaces of the highest quality whilst protecting and enhancing the heritage and quality of life of local communities.

4.17 A contribution to affordable housing is not generally expected from developments with shared facilities provided that it complies with Development Policy DP9 and contributes to creating a mixed and inclusive community.

4.18 A contribution to affordable housing is not generally expected from developments with shared facilities provided that it complies with Development Policy DP9 and contributes to creating a mixed and inclusive community.

4.19 The proposal to provide 39 HMO units with shared kitchen facilities is considered to comply with the London Plan, Core Strategy and Development Plan policies.

5. Residential Development Standards

5.1 We have consulted Camden's Minimum HMO Standards published in April 2007 in designing a scheme to provide the optimum level of accommodation. A copy of the table showing the Net Floor Areas has been provided as the part of the application and is copied at the end of this section for ease of reference.

Bathrooms

5.2 Each of the 39 HMO rooms contains a WC, shower and wash basin within the stipulated minimum area of at least 2.2 sq.m The arrangements and layout of the bath rooms and facilities are fit for purpose, in particular the ease of use of the facilities and adequate natural or mechanical ventilation. This complies with Camden Minimum Standards a copy of which is included in Appendix 10.2.

Kitchens

5.3 Shared kitchens are provided on each floor to be shared by at least 2 units per floor to meet the minimum requirements set out in the Camden Guidance.

5.4 This leaves a clear minimum room area of at least 6.5m² for one person lettings or 8.5m² for two person lettings. Rooms which have their own kitchen facilities have a clear minimum floor area of 11 sq.m in the case of the double rooms and 9 sq.m in the case of single rooms.

5.5 The proposal is consistent with Policy CS6 and the Residential Development Standards contained in Camden Planning Guidance. The proposed units represent a significant improvement on the existing standard of shared residential accommodation. The proposed development will satisfy Camden's space standards in terms of residential HMO development standards. All units have natural ventilation and good level of daylight.

5.6 In addition, the building provides two secure entrances with security controlled access

Storage and utility spaces

5.7 The proposal has been considered in the context of Core Strategy Policy – CS18 - Dealing with our waste and encouraging recycling and Development Plan Policies - DP26 – Managing the impact of development on occupiers and neighbours and DP22 – promoting sustainable design and construction. The proposal is considered to comply with CPG1 section 10 - Waste and Recycling Storage.

5.8 Externally the building contains 6 under pavement vaults of approximately 7m² this provides adequate external storage space for waste, utility and storage.

Recycling and Refuse

5.9 The occupants of the units will be able to take advantage of recycling as there is sufficient space at lower ground floor level for a recycling bins and residual waste collection.

5.10 Internally units without kitchens will be supplied a box or bag for recycling and kitchen caddies within each room which will be emptied by the tenant into larger communal receptacles located in the under pavement vaults.

5.11 Units with shared kitchens will be supplied with communal waste recycling and organic waste bins in the kitchens of a size to comply with Camden HMO standards. The management regime will empty these into the larger communal bins stored in the under pavement vaults.

5.12 Internally units without kitchens will be supplied a box or bag for recycling and kitchen caddies within each room which will be emptied by the tenant into larger communal receptacles located in the under pavement vaults.

5.13 Units with shared kitchens will be supplied with communal waste recycling and organic waste bins in the kitchens of a size to comply with

Camden HMO standards. The management regime will empty these into the larger communal bins stored in the under pavement vaults.

5.14 Collection of waste will take place by a private contractor (RECYCLING FOR LONDON LTD) up to six times a week. However the vaults provide adequate space for both waste and recycling wheelie bins. Each vault could accommodate at least 4 x 360L Wheelie Bin (1100 x 650 x 880). There are two vaults provided which it is believed will give adequate provision for the amount of habitable rooms being provided.

Cycle Storage

5.15 Please refer to transport section for more information of cycle storage.

Outdoor amenity space

5.16 Communal outdoor amenity space is provided within the rear lower ground floor courtyard. In addition the site is within walking distance of 3 public open spaces: 1 minute walking distance of Queen Square and; 5 minutes walking distance of Russell Square and Brunswick Square.

Daylight, sunlight and privacy

5.17 The development is considered to provide a satisfactory level of daylight for each room, particularly ground, first and second floor floors which contain very large windows.

5.18 Given that there is only a single storey lower ground floor extension proposed as part of this scheme, the impacts on neighbouring residential occupiers in terms of sunlight, daylight and privacy are considered to be no different than what currently exists.

5.19 There are no other new windows proposed which would face neighbouring properties and all neighbouring properties would still enjoy an open aspect from their windows

Noise and soundproofing

5.20 The historic fabric and form dictates the layout and placement of rooms within the building. However noise insulation between the floor and partitions limits the impact of noise between bedrooms. The windows

have been replaced with single glazing which fit well and include draught strips to limit the impact of external noise.

5.21 The development will provide high quality housing that provides secure, well-lit accommodation that has well-designed layouts and rooms.

25/11/2011

68-69 Guilford Street

Net Floor Areas "a" and "b" in Sq.meters

	1	2	3	4	5	6	7	8	9
1 Lower Ground Floor	100A a 18.80 b 20.37	100B a 18.55 b 20.96	100C a 14.05 b 16.75	100D a 19.85 b 22.32	100E a 15.08 b 18.03	100F a 22.84 b 25.10	100G a 18.16 b 21.12	100H a 12.75 b 18.07	100I a 12.08 b 14.72
2 Ground Floor	10 a 50.90 b 55.68	10B a 17.20 b 19.77	10C a 13.31 b 16.09	10D a 14.77 b 17.43	10E a 18.79 b 21.73	10F a 14.77 b 17.43	10G a 18.79 b 21.73	10H a 14.77 b 17.43	10I a 18.79 b 21.73
3 First Floor	1A a 14.00 b 15.20	1B a 19.75 b 23.31	1C a 13.31 b 16.09	1D a 14.77 b 17.43	1E a 17.56 b 19.59	1F a 12.44 b 14.88	1G a 14.08 b 17.02	1H a 13.12 b 15.48	1I a 12.08 b 14.72
4 Second Floor	2A a 17.05 b 19.05	2B a 18.81 b 19.29	2C a 19.41 b 22.00	2D a 14.93 b 18.54	2E a 18.05 b 18.58	2F a 18.95 b 21.06	2G a 14.35 b 17.48	2H a 15.48 b 18.10	2I a 12.08 b 14.72
5 Third Floor	3A a 15.45 b 18.48	3B a 22.44 b 24.71	3C a 14.05 b 15.95	3D a 19.42 b 21.72	3E a 14.02 b 16.61	3F a 15.94 b 18.76	3G a 14.02 b 16.61	3H a 15.48 b 18.10	3I a 12.08 b 14.72
6 Fourth Floor	4A a 15.94 b -	4B a 20.00 b -	4C a 20.00 b 24.34	4D a 18.22 b 21.98	4E a 18.22 b 21.98	4F a 18.22 b 21.98	4G a 18.22 b 21.98	4H a 18.22 b 21.98	4I a 18.22 b 21.98

a = Net floor area excluding en-suite bathrooms

b = Net floor area including en-suite bathrooms

Double Bed Units

Single Bed Units

Shared Kitchen

Shared Units

Shared Units

P

6. Design and Heritage

6.1 The proposal would alter and extend two grade II listed building within the Bloomsbury Conservation Area and therefore has been considered against considered in the context of Core Strategy policy CS14, Development Policy DP25 and CPG1.

Significance of Heritage Assets

6.2 Policy DP25 states that development will only be permitted for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building.

6.3 Nos. 68 and 69 Guilford Street are two grade II listed buildings within the Bloomsbury Conservation Area. They are considered to buildings of special architectural and historic interest. However they have been laterally converted and suffered drastically from historic poor maintenance and periods of neglect and they have decayed extensively. The properties have been in such disrepair that they have been placed on the English Heritage 'At Risk Register'.

6.4 The existing plans show the two building have been laterally converted at all levels and extended at the rear. Internally the buildings have been variously altered and subdivided creating multiple rooms per floor with centrally corridor connecting the two-properties. Little of historic interest, including the historic layout, remains internally. This is consistent with many of the properties along the terrace, which have been erroneously altered and poorly maintained when in ownership by the UCLH as nurses' accommodation.

Existing Arrangement

6.5 Prior to works commencing on site the Ground floor of 68 Guilford Street consisted of 5 rooms with associated kitchen and bathroom rooms. The photos confirm these are currently being used as residential rather than office accommodation. The ground floor of 69 comprises a 2 bedroom 19

self-contained flat containing living room facing the street, centrally positioned kitchen and bed and bath rooms to the rear.

6.6 The second bedroom utilises the rear addition of 68 Guilford Street. The self-contained flat has sole access from the ground floor entrance. A central corridor connects the buildings and links to staircases.

6.7 The first floor consisted of 7 bed-sit rooms all of which contain washbasins. The washing and laundry facilities are located on the half landing in 69 Guilford Street with Kitchen and W.C to small rear rooms in 68 Guilford Street. A central corridor links both buildings.

6.8 The second floor consisted of 8 bedsit rooms all of which have washbasins. A communal kitchen is located to the front of the property with shared washing facilities to the rear.

6.9 The third floor consisted of 8 bed-sit rooms with separate washing and cooking facilities. A small shared courtyard exists at the rear of the property.

6.10 The interior is in a poor state of structural repair. The historic plan form has been lost through subdivision of the rooms and central corridor connecting the building. Very few features of interest remain. Due to the extensive modification in the past, the special interest largely consists of the external character and appearance of the buildings and the role the buildings play in forming part of the wider terrace.

Proposal

6.11 The proposed works would renovate the exterior of the building. This would enhance the special character of the building. The features of interests internally including the staircases, partwalls, floors and spine wall would be protected thereby preserving the limited interest of the interiors. Of particular public benefit would be reusing and fully occupying the building allowing it to be revived. The works would protect the building in the long term and allow it to be removed from the Building At Risk register.

Exterior

- 6.12 The exterior is to be refurbished in its entirety. This work has been supervised by Camden Conservation staff and includes repairing the iron balconies; replacing the non-original windows with single glazed timber sash windows to match the neighbouring properties; replacing the modern door case to match the adjoining properties and restoring the brickwork; railing and; high level cornice. The stucco render at ground level will also be restored with banding reinstated.
- 6.13 The new rear extension would be built in stock brick with timber sash windows to match the existing building. The extension would not impact on the special interest of the building but are necessary to enable the building to be renovated to a high standard.
- 6.14 The renovation and enhancement of the front façade would significantly improve the significance of the buildings and listed terrace as a whole in compliance with relevant LDF and London Plan policies.
- 6.15 Along with reusing the building, removing it from the 'at risk' register the works to the front façade are considered to result in substantial public benefit in line with policy PPS5 HE9.2.

Interior

- 6.16 The interior is to be upgraded, the structure made good and the rooms designed to comply with Camden HMO standards. The partywall, spine wall and staircases will be preserved. Only the modern partitions will be upgraded and repositioned where necessary. Note: The staircase to no. 68 Guilford Street has been condemned and cannot be used for health and safety with Fire Regulations.
- 6.17 All the ceiling and partitions walls have modern gypsum plaster which will be replaced like for like.
- 6.18 Structural repairs have taken place to protect the building. These were necessary to stabilise the building. Works have included strapping the front façade to the body structure using helix wall ties (this is a common

problem and solution to buildings of this age) and; strengthening the floors by inserting additional joists next to existing joists. This has also allowed the fire and sound insulation to be installed between each floor. (Please refer to SK/03)

- 6.19 The works would include accommodation in the attic storey. This existing roof was erected in 1982 and is of no historic value. Moreover the new stair would be secondary to the main stair preserving the hierarchy and traditional layout of the upper floors.

Services

- 6.20 New heating and water pipes has been installed utilising existing service routes where possible. New bathrooms have been installed in each room as well as some kitchens. These are services with 2 no. risers which rise vertically from the basement. Pipes run in the ceiling void above the new suspended ceiling located in the central corridor allowing the rooms to retain the floor to ceilings heights and not affecting the existing structure. Bathrooms have been located adjacent to the central corridor to avoid unnecessary pipe routes within the rooms. (Please refer to SK/04)

- 6.21 The proposed works intend to refurbish the buildings and bring them back to a stand suitable for modern day living standards. The features of interest would be preserved and the building repaired and made structural sound.

Townscape and the impact on the Conservation Area

- 6.22 Policies CS14 and DP25 seek to ensure only to permit development within conservation areas that preserves and enhances the character and appearance of the area.
- 6.23 The works to renovate the front façades includes soot washing the brick façades to tidy the elevation and give an even tone across the terrace. This would enhance the character and appearance of the Bloomsbury Conservation Area in compliance with the relevant policies.
- 6.24 The rear façade is not visible from the public realm or neighbouring building and has not impact on the character and appearance of the local area.

6.25 Arguably the proposal would lead to the improvement in the character by optimising a long term redundant site. The legal agreement provides for the development to be car free and the building would be more attractive in the street scene

6.26 The proposed are the minimum necessary to properly restore and stabilise the building and are in no way detrimental to the special character of the listed buildings or to the character and appearance of the surrounding Conservation Area.

7. Sustainability

7.1 The Core Strategy Policy CS13 sets out the approach that developers should take when considering energy and carbon reductions for developments. CPG 3 contains advice and guidance for developers on ways to achieve carbon reductions and more sustainable developments. It also highlights the Council's requirements and guidelines, which support the relevant Local LDF policies.

7.2 The overarching sustainability strategy addresses three main areas:

- Environmental/resources
- Social/Economic Sustainability
- Energy

Environmental Sustainability

7.3 The project is predominantly the refurbishment of an existing property.

This is would significantly reduce resources by optimising an underused building and allow an historic building of special architectural interest to be renovated and reused.

Social Sustainability

7.4 Along with the environmental measures the high quality renovation would result in a highly sustainable project for the following reasons: access to a living environment that is wholly fit for purpose; one where the future occupants health and well being opportunities are not compromised by any limitations imposed by the design of the buildings.

7.5 The majority of the energy consumed through this development will be due to the lifetime energy consumption of the dwellings from regulated and unregulated energy usage arising from occupation of the dwellings and non-domestic space. The proposed design seeks to reduce energy demand using passive measures of good design;

- Orientation and compact building form, enhanced insulation and air tightness
- Good quality construction to reduce thermal bridging Natural Ventilation

- Highly efficient building services.
- Compact building form provides a good surface area to volume ratio which inherently makes the dwellings more energy efficient.
- The buildings are Shallow plan - good for both day lighting and natural ventilation.
- The optimal orientation and shallow-plan building form make a useful contribution toward reducing the overall energy consumption.

7.6 Excellent levels of acoustic separation between the dwellings to provide the right acoustic conditions for privacy and the health and wellbeing being of future occupants. Pleasant living environments with adequate provision of thermal comfort in all seasons and fully opening windows above ground floor that permits night ventilation without the security issue of opening windows.

7.7 Pleasant communal spaces will encourage neighborhood integration and a well-designed external area with lighting provision to ensure the safety of residents and reduce the risk of crime potential.

Economic Sustainability

7.8 The proposal brings back optimal use and adds much needed new homes. The Close proximity to shops and transport links means future occupants will not require the use of cars to access the site or basic amenities and will contribute to the local economy

Active measures;

7.9 The listed status of the building will, however, limit the measures to reduce energy due to the constraints of the site and desire to preserve the elements of significance which still exist within the building.

Lighting

7.10 Low energy LED lighting has been specified throughout

Ventilation

7.11 Passive ventilation will be provided by means of replacement opening timber sash windows.

Heating and Hot water

- 7.12 The renovation includes replacing all the existing heating and hot water services and the will upgrade the principle thermal elements. A green tariff energy source will be selected. A boiler with min. NOx4 rating has been specified.

Water Usage and Recycling

- 7.13 White goods with 'A' ratings have been specified. All sanitary fittings will be specified to minimise water consumption, including aerator taps and showerheads and efficient dual flush toilets. A water meter will be installed. Refuse and recycling facilities have been accommodated within the scheme.

Biodiversity

- 7.14 Due to the constraints of the existing building and site there is little scope within the scheme to improve biodiversity however the developer is willing to install bird boxes/swift bricks to help improve the biodiversity of the area. We would be happy for this to be dealt with by way of condition

Renewable Energy Technology

- 7.15 The scheme has also carefully considered the use of renewable energy. London Plan approved renewable energy technologies include:

- Wind
- Photovoltaics
- Solar Water systems
- Biomass Heating / CHP
- Ground Sourced Heating / Cooling

- 7.16 The choice of technology will be dependent upon a range of factors including: orientation, height, window size, surrounding buildings and environment, site size and layout, geology, conservation and biodiversity.

Ground Source heat Pumps / Biomass Boiler

- 7.17 Ground source heat pumps & biomass boiler have been discounted due to the lack of physical space on such a constrained site. There is insufficient storage capacity and logistics of parking for delivery of wood pellets/chips for the biomass boiler. Boreholes would be required for

ground source, which is prevented because of the existing transport and utility infrastructure beneath the site, and the limited area in the rear court yard to install boreholes which are required to be 5 metres apart per 100kW of duty.

Wind Turbine

7.18 Wind turbine would adversely affect the visual amenity of the area.

There are a number of concerns with wind turbines in an urban environment including; visual impact, noise, cost, maintenance, space, as well as mechanical loading implications for installation of turbines 'on building'. As such this has been discounted.

Photovoltaics / Solar Water

7.19 Photovoltaic or Solar Water systems located on the roof are the most feasible option for this site, offering the greatest CO₂ reduction in the space available. However the shape of the roof (flat topped) and the need to tilt the modules at an optimum angle of 35° in order to capture the maximum amount of solar energy would result in the modules being visible at roof level, particularly in long views from Queen Square. This would adversely affect the character and appearance of the building and terrace. We believe the visual appearance of the front façade is of primary importance over and above the very limited output (lower efficiencies for both systems and lower carbon reductions are unlikely to result in the technologies paying for themselves over the 30 year life span) and therefore have discounted.

8. Transport, Accessibly and Parking

Transport

8.1 The application site is in a highly sustainable location within central London. The site has a PATEL rating of 6a. The site is within 2 minutes walk of Russell underground station Kings Cross overland station is within 15 minutes walk and Euston Overground Station within 20 minutes walk. The site is also well connected in terms of local bus routes.

8.2 As such it is possible to justify a development with no additional requirement for vehicle parking. The Applicant is satisfied that the additional units being created may be deemed to be car-free and is prepared to sign a Section 106 Agreement on this basis.

8.3 Pedestrian access to the site is by way of three steps from pavement level. Access to the site is restricted, particularly for those with impaired mobility and especially for those people reliant on wheelchairs, by virtue of the heritage constraints of the site. As such, to facilitate access for all pedestrian users would not be possible.

Cycle Storage

8.4 We have identified cycle storage area in the under pavement vaults. We have allocated 4 vaults which can easily accommodate two Sheffield stands each, equating to 4 bikes per vault and 16 in total. This would provide a ratio of over 2.5:1 (units v cycle spaces) which we believe adequately meets the cycle storage requirements. Furthermore the cycle storage meets with Camden's guidance in terms of siting and location. Please refer to detailed cycle storage diagram SK/05.

Access

8.5 The proposal converts listed buildings and it is not possible to fully comply with Part M without adversely affecting the special interest of the listed building. The project will, however, provide facilities for use by the less able at ground level.

- 8.6 The existing entrance has 3 steps from pavement level and existing entrance has a threshold step and stair access internally and it is not possible to drop the ground level or install a ramp to create a level threshold without adversely affecting the special interest of the listed building and terrace.
- 8.7 The ground floor will provide opportunity to offer living accommodation at ground level which is capable of being used by less able occupiers. In fact the self-contained unit at 69 Guilford Street has been refurbished, as part of the works, for use by the elderly resident including DDA compliant doorways and corridors and bathroom.

9. Lifetime Homes

9.1 In respect of the 8 self-contained residential units and their compliance with the key criteria of the “Lifetime Homes” standards, we would confirm the following:-

Criteria		Response
1	Where there is car parking adjacent to the home, it should be capable of enlargement to attain 3300mm width. Where parking is provided separately, then a proportion of the spaces should be capable of enlargement to 3300mm.	Not applicable. There is no parking provided in the scheme
2	The distance from the car parking space to the home should be kept to a minimum, and the route to the entrance of the residence should be wheelchair accessible.	Not applicable. There is no parking provided in the scheme
3	The route from back of pavement to all ground floor entrances should be level or gently sloping (maximum gradient 1:12).	The existing entrance has a 3 steps from pavement level. It is not possible to drop the ground level or install a ramp to create a level threshold without adversely affecting the special interest of the listed building and terrace.
4	All entrances should be illuminated and have level access across the threshold. The main entrance should be covered.	External, time controlled lighting will be provided. The existing entrance has a threshold step and is not currently covered. Creating level access and covered entrance would adversely affect the special interest of the listed building.
5	Where homes are reached by a lift, it should be fully wheelchair accessible (including minimum internal dimensions of 1100x1400mm and fittings to Part M standard). In larger developments lift access to upper floor units should normally be provided.	The proposal converts a listed building and it is not possible to fully comply with Part M without adversely affecting the special interest of the listed building
6	Doors, halls and corridors should be wide enough and positioned to allow wheelchair users to gain access to all rooms. Front doors should have a clear opening width of 800mm and internal doors a clear opening width of 750mm. There should be 300mm space allowance between any corner and the opening edge of the door.	Any new door and door openings will comply with the clear opening widths stated. The existing front door is to be replaced and would meet the guidelines. Where existing doorways are being retained it may not possible to meet the guidelines due to the listed status of the buildings.
7	There should be turning space for wheelchairs in dining and living	The proposed units cannot be described as fully wheelchair accessible due to the

	rooms and adequate circulation space for wheelchair users elsewhere. Where furniture layout is shown, a 1500mm turning space should be shown. In kitchens a minimum 1200mm space between units and the opposite wall will suffice.	constraints of the existing building. These include changes of level internally and external which is not possible to overcome due to the listed status of the buildings.
8	There should be living space at entrance level.	There will be living accommodation at ground floor level.
9	In houses of two or more storeys, there should be space on the ground floor that could be used as a convenient bed space.	There will be bed spaces at ground floor level.
10	There should be an entrance level toilet. In smaller units this should be at least to Part M standard. In larger units (3 bedrooms or more) on more than one floor, the WC should be wheelchair accessible and also provide a floor drain, suitable to allow future shower installation. The wheelchair user must be able to close the door from within the closet. An outward opening door will normally be required. There should be a minimum 700mm between the WC pan rim and one side wall, and 1100mm between the WC pan front rim and the opposite wall.	There will be toilets at entrance/ ground floor level. There are 3+ bed units
11	Walls in bathrooms and toilets should be capable of taking adaptations such as handrails.	The toilets are capable of taking adaption such as handrails
12	The design should incorporate: a) provision for a future stair-lift. There should be a minimum of 900mm clear distance between the stair wall and the edge of the opposite stair- rail or balustrade. Unobstructed landing space is needed at the top and bottom of the stairs. b) suitably identified space for a potential through-floor lift from the ground to first floor.	The staircase in 69 Guilford Street has a 900mm clear distance between the stair wall and edge of the opposite handrail. Unobstructed 'landings' are provided at the top and bottom of the stairs
13	The design should provide for a reasonable route for a potential hoist from a main bedroom to the bathroom.	The proposal provides a reasonable route for a potential hoist from main bedroom to the bathroom and second bedroom in the self-contained flat at ground level in 69 Guilford Street
14	The bathroom should be designed for ease of access, to the bath, WC and wash basin. This will normally require an outward opening door, and 1100mm between the front rim of the WC pan and the opposite wall.	The main bathroom of the self-contained flat at ground level in 69 Guilford Street has been for ease of access, to the bath, WC and wash basin.

15	Living room window glazing should begin at 800mm or lower and windows should be easy to open/operate.	Many of the windows have glazing 800mm or lower but those which do cannot be altered to the constraints of the site.
16	Switches, sockets, ventilation and service controls should be at a height useable by all (i.e. between 450mm and 1200mm from the floor).	Switches, sockets, ventilation and service controls will be located between 450mm and 1200mm from the floor.

10. Summary

- 10.1 The application proposes to refurbish and revitalise a pair of dilapidated sub-standard buildings to provide a mix of 39 HMO rooms and a self-contained 2-bedroom apartments. The proposed application would result in the loss of some ancillary office space and key-worker nurses accommodation for which it has already been established in acceptable in this location.
- 10.2 The proposed use represents the best use of the site given its former use. The scheme complies with policy DP9 and we do not believe there would be any harm to the mixed and balanced community in the area given the variety of uses which currently exist in the vicinity.
- 10.3 We are aware the Council has recently written to adjoining owners stating their desire to see a range of residential uses on this part of Guilford Street terrace. However we do not feel this should prejudice this scheme which should be judged on its own merits and without second guessing the future use of the adjoining sites.
- 10.4 This scheme will result in substantial public benefit by optimising the use of the site. It would bring a vacant building back into use, create additional residential living space at an affordable level in the private rental sector and refurbishing a listed building on the building at risk registry.
- 10.5 The proposed development will satisfy Camden's space standards in terms of residential development standards for both self-contained and HMO units. The application site is in a highly sustainable location with very good access to public transport and would be car-free.
- 10.6 We therefore consider this to represent a robust Planning Application and one which should be recommended for Planning Approval.