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Planning Design Economics

**28-30 THEOBALD'S ROAD
LONDON, WC1**

PLANNING STATEMENT

Prepared on behalf of:
Winllan (Theobald) Ltd

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1.0 INTRODUCTION

- 1.1 This statement has been prepared on behalf of Winllan (Theobald) Ltd to assist the Council in the determination of an application for full planning permission for the change of use and extension of 28 – 30 Theobald's Road to provide a mixed use building comprising a Class A3 restaurant and residential apartments.
- 1.2 The application relates to an unlisted mid-20th century building located on the north side of Theobald's Road, between Great James Street and John Street and within the Bloomsbury Conservation Area. The proposed development comprises roof and rear extensions; provision of a Class A3 restaurant on part ground and lower ground floors; provision of 14 apartments on part lower ground and first to fifth floors; and various alterations to the front façade, including the creation of a new restaurant entrance and window. The proposals have been designed by Dawe and Geddes Architects.
- 1.3 This Statement is divided into the following sections:
- Section 2.0 provides a description of the site and surrounding area;
 - Section 3.0 sets out the planning history of the site and adjoining buildings;
 - Section 4.0 describes the proposed mixed-use development;
 - Section 5.0 summarises the relevant planning policy framework and in its conclusions identifies the key planning and design issues;
 - Section 6.0 considers each of the key planning and design issues; and
 - Section 7.0 provides our conclusions.
- 1.4 In addition to this Planning Statement, the application is also accompanied by an Urban and Architectural Design Statement prepared by Dawe and Geddes Architects.

2.0 SITE AND SURROUNDINGS

Site

- 2.1 The application site is located on the north side of Theobald's Road, between Great James Street and John Street and opposite Gray's Inn Walk (Appendix 1 –Site Plan). It is within the Bloomsbury Conservation Area.
- 2.2 The application building is an unlisted mid 20th Century office building comprising a lower ground, ground and four upper floors on a site of some 405 sq.m. It is a relatively simple commercial design which is typical of its time. Although it lacks any particular architectural interest, its front elevations and parapet height relate to some of the other buildings on the north side of Theobald's Road and fronting Gray's Inn Walk (Photograph 1). The front lower ground and ground floor elevations are faced in pre-cast concrete panels which are detailed to give the appearance of gauged stonework. The first to third floors are faced in red brick and the elevation is split into three bays in the order of 2-3-2 timber-framed sash windows. The first floor windows are foreshortened by false metal window boxes and dummy balcony railings which disrupts the hierarchy of the front façade. The front lightwell area is bounded by steel railings and a concrete bridge / wheelchair ramp provides access to the office entrance.
- 2.3 The rear elevation is simple and faced in yellow stock brick with metal-framed side-hung windows (Photographs 2 and 3). A projecting rear-wing contains toilets at each level.
- 2.4 At the front, the top floor is in the form of a blue / black slate mansard with a bitumen roof and render-cheek dormer windows. At the back, the top floor is treated in the same way as the rest of the rear façade.
- 2.5 On top of the roof are a substantial brick lift overrun / plant room (at the front) and a brick water tank enclosure (above the toilet wing at the rear). There is also a large item of external plant located behind the lift overrun / plant room (Photographs 4 and 5).
- 2.6 The building comprises 1,476 sq.m of office floorspace (gross external). Of this, 1,198 sq.m is net lettable. The building is currently occupied by LB Camden and is

used as the Holborn District Housing Office. We understand that the Council occupy the building on a short lease and that they intend to vacate in March 2006.

Surroundings

- 2.7 The application site is located within a mixed-use commercial / residential neighbourhood which contains buildings of various periods, design and form. The area is generally of high townscape quality and is within the Bloomsbury Conservation Area.

Bloomsbury Conservation Area

- 2.8 The Bloomsbury Conservation Area was designated in 1968 and has subsequently been extended. It now covers a large part of the Borough of Camden – stretching from the University of London / University College London and Fitzroy Square in the west to Gray's Inn Road in the east and from Euston Road in the north to High Holborn / New Oxford Street in the south. The Council published the Bloomsbury Conservation Area Statement in 1998 which identifies the key characteristics of the Conservation Area and provides advice on development within it.
- 2.9 The Conservation Area is varied in character and the range of uses it encompasses (including major academic institutions, the British Museum, Inns of Law, headquarter offices, government offices, shops, restaurants, bars and housing). However, there are a number of unifying characteristics, including the relatively large number of squares and other small public and private open spaces and the buildings around them. That part of the Bloomsbury Conservation Area in the vicinity of the application site is described in more detail below.

Theobalds Road

- 2.10 Theobalds Road is a major two-way street running between Gray's Inn Road and Southampton Row (defined as a Borough Distributor in the Adopted UDP 2000). It is fronted by a variety of buildings with mainly commercial uses on the ground floor (including shops and food and drink uses) and either offices or residential accommodation on the upper floors.
- 2.11 The whole of Theobald's Road between No. 24 and 38 was bomb-damaged during the Second World War and completely cleared in the immediate post-war period. It

was only in 1960 that replacement buildings were completed (none of which have been subsequently listed).

- 2.12 Immediately to the west of the application site at 32-38 Theobald's Road is the Holborn Public Library (Photograph 8). Pevsner describes this 1960s LB Camden-designed building as having *"a lively street front with a pattern of hexagonal concrete panels below two main floors with continuous glazing and a brick-faced top storey."* In fact, the top storey is predominantly glazed (both at the front and the back) and may be an extension to the building. It has a copper roof which exceeds the height of the application building's roof by approximately 2.1m. The library has recently been refurbished.
- 2.13 To the east of the site, 24-26 Theobald's Road is a mid 20th century office building comprising a basement, ground and four upper floors (Photograph 6). It is of a similar style to No. 28-30, though far grander and with better detailing. Its roof is clad in grey/green slates and also has plant rooms atop. The building is occupied by the Law Commission.
- 2.14 Further along the north side of Theobald's Road, to the east and west, buildings date from the 18th, 19th and early 20th centuries and are in a mix of commercial and residential use. To the west, the buildings date from the 19th and 20th Centuries and are an eclectic mix of styles and heights, particularly in terms of their gabled roofs which vary from two to five/six storeys (Photograph 7). To the east of the site, the buildings vary from four to five storeys in height and are earlier in date. Again, roof forms vary - the roof to 1 John Street is hidden behind the parapet, while 12-22 Theobald's Road have visible slate pitched roofs and Nos. 2-10 are mansarded. Nos. 12-22 are Grade II listed.

John's Mews

- 2.15 To the rear of the application site, John's Mews comprises mainly 2-3 storey residential accommodation on the east side, with the substantial Camden Council depot and theatre on the west side. The view south down the Mews terminates with the modern Council library (Photographs 2-3).

Gray's Inn

- 2.16 The application building is located opposite Gray's Inn and is separated from it by Theobald's Road. This historic Inn of Court, dating from the 15 Century, still provides

accommodation for lawyers – mostly barristers' Chambers. Immediately opposite the application site is the 'Walk' – a landscaped area of green space which is designated as a London Square and a Grade II* Garden of Special Historic Interest. The Walk is in private ownership and the public are only admitted for a limited time each weekday. It was first laid out in the late 16th Century but has been much altered. The application building is visible in views across the Walk, although the view is often obscured when trees are in leaf. The Raymond Buildings (listed, Grade II) are located on the west side of the Walk and date from the early 19th Century. They comprise a lower ground, ground and three / four upper storeys and are described by Pevsner as "*exceedingly plain*". The Verulam Buildings are similar in age and design and run down the east side of the Walk.

Public Transport, Shops and Services

- 2.17 The application site is in an excellent location with respect to public transport – being only a short distance from London Underground stations, mainline railway stations and local bus routes. Several tube stations are located within a short walk of the site, including Chancery Lane (Central Line), Holborn (Central and Piccadilly Lines) and Farringdon (Metropolitan, Circle and Hammersmith and City Lines). Main line stations at Kings Cross, St Pancras, Farringdon, Euston and Charing Cross are a walk or short bus ride away. Bus routes running along Theobald's Road include 19 (Battersea – Finsbury Park), 38 (Victoria – Clapton), 243 (Waterloo – Wood Green) and 55 (Oxford Circus – Leyton).
- 2.18 A bus lane runs along part of Theobald's Road, including outside the application building where use of the lane is restricted to busses and taxis only between the hours of 07.00-10.00 and 16.00–19.00 Monday to Friday.
- 2.19 The site is also in an excellent location with respect to local and West End shops and services.

Conclusions

- 2.20 The application building is modern and of little architectural interest in its own right. It is located in an area of varied but generally high townscape quality which is within a conservation area, and is visible in views across Gray's Inn Walk. The site is in a predominantly commercial area which also contains a significant element of

residential accommodation and is in an excellent location with respect to public transport and local shops and services.

3.0 RELEVANT PLANNING HISTORY

Application Site

- 3.1 The whole length of Theobald's Road between No. 24 and 38 was damaged during the Second World War and by the early 1950s the site was completely cleared.
- 3.2 Conditional planning permission was granted on 25 February 1955 for *"the erection of a building comprising five storeys and basement to be used for office purposes"*. Conditions required the provision of parking facilities for at least four cars and the approval of details of the facing materials. This permission appears to have been implemented, although the parking facilities were never provided.
- 3.3 On 14 January 1957, conditional permission was granted for the erection of a single storey caretakers quarters at the rear of the site.
- 3.4 A number of temporary permissions were granted between the late 1950s and early 1980s for the retention of temporary buildings at the rear of the site for use as offices.

Adjoining Buildings

- 3.5 On 22 October 1958, conditional permission was granted for the erection of a new building on the site of 32-38 Theobald's Road for use as a public library, lecture and exhibition hall. Subsequently, in 1991, permission was granted for change of use of the third floor from library offices to a Citizens Advice Bureau.
- 3.6 Behind the library, at Cockpit Yard, conditional permission was granted in 1998 and 2003 for conversion / extension of part of the depot building to residential. The whole of Cockpit Yard is likely to be redeveloped in the short to medium term and the Council's preference is for a mixed use scheme including community use, Class D1, B1 and residential. The latest version of the Revised UDP 2004 indicates that the redevelopment site could include Holborn Library and 40-46 Theobald's Road.
- 3.7 We have been unable to trace planning permission for the construction of 24-26 Theobald's Road / 37-38 John Street. In August 1974, conditional permission was granted for widening of the existing basement windows to the building and in October 1992, conditional permission was granted for the installation of external air conditioning plant at roof level.

Conclusions

- 3.8 The application building and those adjoining were developed separately in the late 1950s / early 1960s. The architectural style / materials of the library do not accord with the application building or No. 24-26. Various uses have been permitted in the immediate vicinity, including offices, residential and a library.

4.0 PROPOSED DEVELOPMENT

- 4.1 The current application is for roof and rear extensions, together with alterations to the front elevation, and the use of the building for mixed-use purposes as a Class A3 restaurant on part ground and lower ground floor levels and 14 residential flats on the part lower ground and first to fifth floors.

Demolition

- 4.2 Parts of the existing building will be demolished to enable the proposed works, including the whole of the rear elevation and most internal walls and partitions. Importantly, the unsightly roof-top lift motor room / overrun, water tank enclosure and external plant at roof level will be removed, together with the building's lift and stair core.

Roof Extension and Alterations

- 4.3 A new fifth floor roof extension is proposed to replace the existing roof-top lift motor room / overrun and water tank enclosure. The new storey will be a predominantly glazed, light-weight construction set on top of the existing fourth floor mansard storey. The front will be set some 1.7m behind the top of the fourth floor mansard, and some 2.5m behind the main building frontage. The rear will be set 2m behind the main rear building line and, again, is mainly glazed.
- 4.4 The new lift will be powered from the bottom of the building and will not require a substantial overrun. Consequently, a lift motor room / overrun at roof level will not be necessary.
- 4.5 The existing front mansard slope and dormer windows are in poor condition. The mansard slope will be renovated and re-slatted with natural blue-black slates (as existing) and the dormers will be refurbished - with the existing render-cheeks being replaced with lead.

Rear Extension

- 4.6 In order to create a building of sufficient depth to accommodate up to three flats per floor, the rear of the building will be extended by approximately 2.5m and rebuilt on

the line of existing rear WC wing. From first floor level and above, the western part of the new rear wall will stop short of the boundary with the Library by 2.5m.

- 4.7 The design of the new rear façade will be contemporary in order to relate to the adjoining Library. It will be faced in yellow London stock bricks (as existing) punctuated by aluminium windows which will be grouped together with lead panels in between.

Other External Alterations

- 4.8 The existing poor quality timber and glass front doors to the Council's offices will be replaced by new high quality glass doors which will form the residential entrance.
- 4.9 In order to provide a separate entrance to the proposed restaurant, a new door opening will replace two existing individual windows located on the right-hand side of the front elevation. A new glass bridge will provide access across the lightwell and the existing steel railings at the front will be replaced by a new steel and glass balustrade. New glass canopies will be provided above each entrance.
- 4.10 The restaurant window will be formed by combining the three central windows and extending them down to floor level.
- 4.11 The front first floor metal boxes / dummy balconies will be removed and the window sills will be extended downwards in order to improve the hierarchy of the front façade. The timber sash windows will be replaced to match the existing and the front façade will be cleaned and refurbished.

Residential Provision

- 4.12 The proposals will provide 1,470 sq.m (gross external) of residential floorspace (1,044 sq.m net internal, excluding the lift, stairs, halls and other shared / communal areas). 14 dwellings will be provided in the following mix:

4 x one bedroom	(29%)
7 x two bedroom	(50%)
3 x three bedroom	(21%)

Amenity Space

- 4.13 Private terraces will be provided at the rear of the building at lower ground and ground floor levels (separated by obscure glass balustrades to prevent overlooking)

for the exclusive use of the three bedroom apartments located at the rear of the lower ground floor and first floor respectively. The two-bedroom flat at the rear of the fifth floor will also have access to a terrace at that level.

Restaurant

- 4.14 A restaurant of some 324 sq.m (293 sq.m net internal) is to be provided on the ground and lower ground floors. The ground floor dining room will be approximately 204 sq.m and will provide up to 60 covers. Kitchen ventilation ducting will run from the lower ground floor kitchen through an internal services duct adjacent to the lift and discharge at roof level.

Refuse and Servicing

- 4.15 Residential refuse and recycling storage will be provided within a room at the front of the lower ground floor (which is accessible both from the lift / main staircase and the front lightwell). Refuse and recycling storage for the restaurant will also be provided on the lower ground floor.
- 4.16 Servicing is likely to be undertaken by small transit-sized vans. Deliveries of fresh food and laundry are likely to be taken 3-5 times a day.

5.0 PLANNING POLICY FRAMEWORK

- 5.1 This section summarises the statutory planning policy framework set out in Government Planning Policy Guidance Notes (PPG) and Planning Policy Statements (PPS); the London Plan; and the Adopted LB Camden UDP 2000 and Deposit Draft Replacement UDP. It also considers non-statutory Supplementary Planning Guidance (SPG) issued by LB Camden.

National Planning Policy

- 5.2 National planning policy seeks to encourage sustainable development, regeneration and 'urban renaissance' through promoting a mix of commercial and residential uses at higher densities within town and city centres, the development of 'brownfield' rather than 'greenfield' sites, the change of use to residential of commercial sites that are surplus to requirements and by integrating land use and transport in order to reduce average journey lengths and reduce reliance on cars. Of particular importance in this case are PPG3 and PPG15.
- 5.3 PPG3 (Housing) seeks to increase housing provision, particularly on previously developed sites in urban areas with good access to jobs, services and public transport. Housing should be of a type and size which meets 'housing need'. Mixed use development which includes housing is encouraged and commercial sites that are surplus to requirements should be reconsidered for residential development.
- 5.4 PPG3 has recently been updated (24 January 2005) to include a requirement for LPAs to "*consider favourably*" applications for housing or mixed-use development on land allocated for commercial use, but which is no longer required for such use. LPAs should consider such planning applications favourably unless:
- They fail to meet other requirements of the PPG, particularly the presumption in favour of previously developed sites;
 - The housing development would undermine the planning or housing strategy set out in Regional Planning Guidance or the development plan - particularly if it would lead to over-provision of new housing where it would lead to low demand;
 - It can be demonstrated through an up-to-date review of employment land that there is a realistic prospect of the employment location being taken up in the plan period, or that its development for housing would undermine regional and local strategies for economic development and regeneration.

5.5 The Government considers that the design of new development is an important factor in nurturing town and city centres that people want to live in, work in and visit. PPG15 (Planning and the Historic Environment) is an important consideration in this case because the site is located within a conservation area. The PPG generally requires all new development to be of a high standard of design and to preserve or enhance the character or appearance of the area. In addition, new development must have regard to preserving the setting of listed buildings.

5.6 Within town and city centres, conservation of the area's character or appearance must be a *"major consideration"*, however, this should not prevent all new development. The aim is for development within town centres to be positively managed in order to allow the area to remain *"alive and prosperous"*, while at the time ensuring that *"any new development accords with the area's special architectural and historic interest"*.

The Development Plan

5.7 Section 54A of the Town and Country Planning Act 1990 requires that planning applications should be determined in accordance with an adopted or approved development plan, unless material considerations indicate otherwise. In this case, the 'development plan' comprises the adopted London Plan published in February 2004 and the LB Camden Unitary Development Plan Adopted March 2000.

The London Plan

5.8 The London Plan provides the 'spatial development strategy' for London to which all London borough UDPs and newer Local Development Frameworks (LDFs) will need to broadly confirm.

5.9 The London Plan seeks to accommodate substantial economic and demographic growth in London whilst creating a more open and equitable society and preserving the environment and heritage. It includes both area-based and thematic policies.

Area-Based Policies

5.10 The Plan provides strategies for five sub-regions (central, east, south, north and west); the application site is within the Central London Sub-Region. The strategic priorities for the Central Sub-Region include:

“identify capacity to accommodate new job and housing opportunities and appropriate mixed use development”

“maximise the number of additional homes ... by exceeding housing provision targets set out in this Plan and secure mixed and balanced communities” and

“promote and intensify retailing, services, employment, leisure and housing in town centres and opportunities for mixed-use development.”
[Policy 5B.1 The Strategic Priorities for Central London].

5.11 The Plan seeks the provision of 107,000 new homes in the Sub-Region by 2016.

5.12 The application site is within the Central Activities Zone within which *“mixed use developments are especially valuable”* – particularly because areas of housing and local businesses are less dominant in some areas [paragraph 5.28].

5.13 The site is also within an area designated in the Plan as an *Area for Regeneration* (within 20% of the most deprived wards in London) which is prioritised for action and investment [Policy 2A.4 – Areas for Regeneration].

Thematic Policies

5.14 Thematic housing policies in the Plan promote new residential development and seek to ensure that it is provided at a density that makes efficient use of land, supports local services and amenities and in a form that meets local need. New housing development is to be maximised [Policy 3A.1 – Increasing London’s Supply of Housing] and Boroughs should seek to exceed their housing target - which in the case of Camden is 16,940 additional dwellings by 2016 (850 per year) [Policy 3A.2 – Borough Housing Targets].

5.15 An important source of additional housing supply detailed in the Plan is *“change of use of unneeded industrial / employment land to residential or mixed use development”* [Policy 3A.2 - Borough Housing Targets].

5.16 The Plan includes a strategic target that 50% of all additional housing should be affordable but leaves Boroughs to set their own overall target, based on *“an assessment of all housing needs and a realistic assessment of supply”* [Policy 3A.7 - Affordable Housing Targets]. The Plan advises Boroughs to set a threshold above which affordable housing should be provided *“at no greater than 15 units”* [paragraph 3.46].

5.17 The Plan's thematic transport policies seek to reduce the need to travel, especially by car, improve public transport capacity and locate high density schemes in areas of good public transport accessibility.

5.18 Policy 3C.22 [Parking Strategy] seeks to ensure that car parking at new developments is restricted to the minimum necessary.

5.19 New retail development should follow the sequential approach, with town centres being the preferred location [Policy 3D.2 Town Centre Development].

5.20 The Plan places design at the centre of planning in London and particularly as a tool for helping to accommodate London's growth within its boundaries:

"Good design is central to all the objectives of the Plan." [paragraph 4.34]

5.21 The principles of *"design for a compact city"* include ensuring that developments:

- Maximise the potential of sites;
- Create or enhance the public realm;
- Provide or enhance a mix of uses; and
- Respect local context, character and communities.

5.22 In order to maximise the potential of sites, the Plan includes a matrix setting out appropriate residential density ranges for different locations in London [Table 4B.1]. For a Central London site with a PTAL score of between 4 and 6, the density range is up to 240-435 flats per hectare (650 – 1100 habitable rooms per hectare).

5.23 Policy 4B.15 [London View Protection Network] sets out a framework for protecting strategically important views in London. It identifies a number of panoramas, including Primrose Hill to St Paul's Cathedral, within which the site lies. Within panoramas, Management Plans for the views will require proposed developments to *"fit within the prevailing pattern of buildings and spaces"* and they should not detract from the panorama as a whole [Policy 4B.16 – View Management Plans]. We understand that the Mayor will publish further guidelines and a draft View Management Framework shortly.

L B Camden UDP

5.24 The LB Camden UDP was adopted in March 2000 (Adopted UDP 2000) and is currently being reviewed. A Deposit Draft Replacement UDP was published in June 2003 for consultations (Deposit Draft UDP 2003) and a Revised Deposit Draft UDP was published in May 2004 for further consultations (Revised Deposit Draft UDP 2004). A Public Inquiry into outstanding objections to the UDP ran from December 2004 to February 2005 and the Inspector's Report is expected later this year. The revised UDP is not expected to be adopted until 2006. In the meantime, the Adopted UDP 2000 forms the statutory Local Plan, although the deposit draft versions and pre-Inquiry changes to the UDP are a material consideration for planning purposes.

5.25 The following paragraphs summarise the key UDP policies that are relevant to the current proposals.

UDP Proposals Map

5.26 The UDP Maps include the following designations for the site:

- Central London Area (within which the Council will seek to balance the demand for business development against other objectives such as increasing housing provision, and also encourage mixed use development and increased provision of residential accommodation [Adopted UDP 2000 – Policies SCL1 and SCL2].
- Bloomsbury Conservation Area
- Strategic View – Viewing Corridor (Primrose Hill to St Paul's Cathedral)
- Strategic View – Background Consultation Area (St Paul's Cathedral from Greenwich Park)
- Gray's Inn Walk (opposite the site) is designated as Open Space, which has strong protection.

Guiding Principles

5.27 Both versions of the UDP generally seek to encourage sustainable and mixed-use development which makes the most efficient use of land.

Environment and Design

- 5.28 Adopted and revised UDP policies encourage high standards of design in all development and seek to protect adjoining occupiers from the harmful effects of any development, including extensions to existing buildings [eg. Adopted UDP 2000 policies EN13 and EN19].
- 5.29 With regard to extensions, Policy EN22 of the Adopted UDP 2000 states that *"the Council will seek to ensure that proposals relate to the form, proportions and character of the building and its setting and have regard to the historic pattern of development in the surrounding area"*. In addition, *"extensions should be subordinate to the original building in terms of scale, situation or use of materials and should not dominate neighbouring buildings"* [Adopted UDP 2000 - Policy EN22].
- 5.30 Revised Deposit UDP 2004 Policy B3 additionally states that the Council will not grant permission for alterations and extensions that it considers will cause harm to the architectural quality of the existing building or to the surrounding area. Importantly, it also states that part of the Council's consideration of such proposals will include whether *"unsympathetic alterations or extensions are removed or improved"*. The supporting text recognises that some locations are especially sensitive to roof extensions, such as around open spaces which allow views of roofs [paragraph 3.33].
- 5.31 Adopted UDP 2000 Policy EN24 states that the Council will resist inappropriate roof extensions and in considering applications for roof extensions will consider:
- "a. the prominence of the roof concerned;*
 - b. the characteristics of the roof and those of neighbouring buildings in terms of shape, design, materials, and the existence of traditional features such as chimney stacks and protruding fire walls;*
 - c. the symmetry of pairs, and the integrity of terraces and other cohesive building groups; and*
 - d. the proportions and architectural treatment of the building itself and its relationship to the original style and materials of other buildings in the vicinity.*
- Where the opportunity arises, the Council will welcome the removal or improvement of existing unsympathetic roof alterations or extensions."*
- 5.32 Both the Adopted and Revised UDPs seek to ensure that development in conservation areas preserves or enhances their special character or appearance.

5.33 Both versions of the UDP seek to protect the Strategic Views and state that permission will not normally be granted for development if the proposed height exceeds the relevant development plane or if the development would harm the strategic view or the 'background consultation area' [eg. Adopted UDP Policies EN43-45].

5.34 The Adopted UDP 2000 states that the Council will not permit development which *"may adversely affect the integrity, setting, historic and nature conservation interest of parks, gardens and London Squares"* [Policy EN49] or which is detrimental to the *"integrity, appearance and setting"* of open space *"in terms of height, scale or massing"* [Policy EN52].

Transport

5.35 The Adopted UDP 2000 encourages development to locate in areas where public transport capacity is adequate to serve it [Policy TR5].

5.36 Both versions of the UDP seek to restrain the use of private motor cars and encourage 'car free' development in various locations, including within the Central London Area [eg. Revised UDP 2004 Policy T8].

Housing

5.37 Housing is defined as *"the priority use of the UDP"* and the Council will seek *"to secure net additions to the housing stock wherever possible"* [Adopted UDP 2000 Policy SHG1].

5.38 Both versions of the UDP seek to generally increase the amount of land in residential use and secure accommodation of an acceptable standard.

5.39 The Adopted UDP 2000 encourages the change of use to residential of existing non-residential buildings that are surplus to requirements, subject to other UDP policies [Policy HG9].

5.40 The Adopted UDP 2000 imposes a density standard of 247-617 habitable rooms per hectare in Central London [Development Standard 2]. Densities are expected to be within this range, but variations may be acceptable in certain circumstances, including where the site is in an area with good public transport accessibility. The Revised

UDP 2004 deletes the density standard and encourages higher density development in order to make the best use of the scarce land resource.

- 5.41 Both versions of the UDP only expect affordable housing to be provided in association with schemes with the capacity for 15 or more dwellings or on sites larger than 0.5 hectares [eg. Adopted UDP Policy HG11].
- 5.42 Both versions also seek the provision of an appropriate housing mix suited to site conditions and the locality.

Economic Activities

- 5.43 The Adopted UDP 2000 (Policy EC3) and the Revised Deposit UDP 2004 [Policy E2] generally seek to retain suitable sites for continued employment use (including Class B1). However, an exception to this may be made, in appropriate areas, in the case of a change from Class B1(a) office use to permanent residential. The Council's main concern is to ensure the retention of small office suites (50-120 sq.m) and modern offices (constructed within the last ten years). Again, the supporting text to Revised Deposit UDP 2004 Policy E2, which deals with the circumstances in which the Council will permit changes of use from business use, states that "*the priority use of this Plan is housing*" [paragraph 7.19].

Shopping and Local Services

- 5.44 Policy SH18 of the Adopted UDP 2000 states that in considering applications for A3 use, the Council will consider the 'need' for such use and may impose conditions to control, for example, hours of operation and arrangements to overcome potential loss of amenity. The Revised UDP 2004 states that the Council will grant permission for food and drink uses in Central London Frontages, and that, sequentially, other central and town centre locations may be appropriate [Policy R1]. Revised UDP 2004 policies R2 and R3 set out the criteria the Council will use in considering applications for new food and drink uses and to protect amenity. They require that the proposal is readily accessible by a choice of means of transport and will not cause harm to the character, function and viability of the area.

Supplementary Planning Guidance

- 5.45 In addition to the adopted and revised deposit Local Plan policies, LB Camden has published Supplementary Planning Guidance documents which have been taken into

account in formulating proposals for this site. Relevant SPG includes: Sustainable Development [1.3], Internal Arrangements – which specifies minimum dwelling and unit sizes [2.3], Waste and Recycling [2.5], Alterations and Extensions [2.7], Roofs and Terraces – which outlines the circumstances in which extensions may or may not be acceptable and provides guidance on design and materials [2.8], Access [3.1], Plant and Machinery [4.8], Car-Free Housing [5.2] and Cycle Movement [5.6]. Regard has also been had to the Bloomsbury Conservation Area Statement, and in particular paragraphs 9.12 – 9.16 concerning roof and rear alterations and extensions.

Conclusions

5.46 Consideration of the planning policy framework has identified the following 'key issues' that will be considered in the next section of this Statement:

- Change of Use from Business Use
- Dwelling Mix and Residential Density
- Roof Extension Design and Visual Impact
- Impact on Strategic View
- Rear Extension Design and Visual Impact
- Impact of Extensions and Terraces on Residential Amenity
- Restaurant
- Design of Ground Floor/Front Elevation Alterations
- Parking and Servicing

6.0 ASSESSMENT OF PROPOSALS

Change of Use from Business Use

- 6.1 The existing building is fifty years old and has not been well maintained. It provides poor quality office accommodation for which, according to local office agents Farebrother Chartered Surveyors, there is likely to be little market demand. In addition, we are advised that the existing building could not be readily upgraded to meet the requirements of modern businesses who require larger uninterrupted floorplates with greater floor to ceiling heights and fully integrated technology. The current occupier of the building, Camden Council Holborn District Housing Office, is due to vacate the building in March 2006.
- 6.2 Central Government and London Plan policies clearly provide strong support for mixed-use and housing development on sites that are no longer required for commercial use. In addition, the Council's planning policies strongly favour residential uses above any other and seek to secure additions to the housing stock wherever possible. Although the Council may seek to protect certain business uses, it makes an exception in the case of changes of use from Class B1 offices to permanent residential. In this part of the Borough, the Council is keen to ensure the availability of "*modern purpose-built office stock*" (constructed within the last 10 years) and to protect premises suitable for small firms (50-120 sq.m) [Revised Deposit UDP 2004 – Paragraph 7.20]. Clearly, the application building falls outside of either of these criteria.
- 6.3 In these circumstances, the change of use from Class B1 offices to a residential-led mix of uses is clearly acceptable in policy terms. It would also be beneficial in terms of increased housing provision in an area which contains a mix of uses, but which is currently weighted towards commercial (mainly office) uses which do not operate at weekends or in the evenings. Additional housing and restaurant use will result in additional activity in the evenings and at weekends.

Dwelling Mix and Residential Density

- 6.4 The mix of dwelling sizes proposed, which is weighted towards smaller one and two bedroom units, is well suited to both the individual site conditions and the locality.

- 6.5 This location is not well served by large areas of public open space (although Gray's Inn Walk is open to members of the public for limited hours daily). The housing mix is therefore weighted towards smaller-sized, non-family dwellings. Of the three three-bedroom units provided, two of them have access to private amenity space (at lower ground and ground floor levels). Dwelling and room sizes all comply with the relevant SPG [2.3 - Internal Arrangements].
- 6.6 The density of development is calculated at 818 habitable rooms per hectare (hrh) in accordance with the Adopted UDP 2000 methodology. Although this exceeds the density standards of 247-617 hrh, variations are allowed in certain circumstances, such as where a site is in an area with good public transport accessibility. Given the excellent local public transport links, the density level is considered to accord with the UDP policy.
- 6.7 The density is calculated at 1,012 hrh or 345 units per hectare (uph) in accordance with the London Plan methodology. This accords with the London Plan density range for a central London site which is to be developed for flats (650-1100 hrh / 240-435 uph).

Roof Extension Design and Visual Impact

- 6.8 The Urban and Architectural Design Statement, which is submitted in support of this application, recognises that the application building is in a sensitive location and demonstrates that the proposed roof extension preserves and enhances the character and appearance of the Bloomsbury Conservation Area, the setting of listed buildings in the vicinity and key views. It sets out the relevant planning and design policy context and analyses the site and the surrounding area, including the townscape role played by the application building, the key features of the Conservation Area and key local views. From this contextual analysis, a number of important overall design objectives for the scheme are identified, including:
- The statutory requirements to preserve and enhance the character and appearance of the Conservation Area and to preserve the setting of listed buildings;
 - Maximise the potential of the site;
 - Provide a mix of uses;
 - A high quality of design which respects its local context and has no adverse impact on key local views;

- Protection of the Strategic Views;
- Removal of the unsympathetic lift motor room, water tank enclosure and external plant located at roof level;
- Relate the form of the extensions to the proportions and character of the building and have regard to the historic pattern of development in the area;
- Ensure that extensions are subordinate to the original building in terms of scale, situation and use of materials; and
- Protect residents amenity.

6.9 The Urban and Architectural Design Statement demonstrates that the proposals conform to these objectives. In the case of the new fifth floor:

- The existing lift motor room, external plant and water tank enclosures are removed. These elements are poorly designed and built, and interrupt the existing roof-form. They are clearly unsympathetic to the application building and detrimental to the character and appearance of the Conservation Area, particularly in views along Theobald's Road and from Gray's Inn Walk. Their removal is to be welcomed.
- Both the roof extension and the rear extension help to maximise the potential of the site and enable a viable mix of uses and quantum of residential floorspace to be provided within the building. Importantly, the new fifth floor provides space for two additional apartments within an extension which preserves and enhances the character and appearance of both the application building and the Conservation Area.
- The new fifth floor is a light-weight extension which replaces the solid and unsympathetic lift motor room, external plant and water tank room. The existing jarring and discontinuous roof line (which is formed partly by the lift motor room, partly by the fourth floor mansard roof and partly by the water tank enclosure) will be replaced by a continuous, high-quality horizontal roof form. The new roof will be only slightly higher than the copper roof to the library (by approximately 750mm).
- The new fifth floor is clearly sub-ordinate to the original building - it is a light-weight predominantly glazed storey which is set back some 2.5m from the main front building line and 2m behind the rear building line. It relates to the proportions of the building below and also to the predominantly glazed top storey of the adjacent library.
- Setting the new storey back from the front building line also minimises its visual impact in key views, particularly from Theobald's Road and Gray's Inn Walk. Importantly, it is set about 1m further back than the existing lift motor room.
- The roof extension will make a positive contribution to the roof line of this part of Theobald's Road which is already varied in terms of height, design and materials. Immediately to the west of the application site is the modern glazed top floor and copper roof to the Council Library and beyond that a series of gabled roofs of various heights and styles. To the east of the application

building is a green / grey slate mansard roof with plant rooms, etc above it. Further east, on the other side of John Street, 1 John Street has a roof hidden behind a parapet, then there is a series of sloping grey slate roofs of various heights and beyond that taller mansards. There is also variation in the roof line to the Raymond Buildings which enclose the west side of Gray's Inn Walk - the number of visible storeys varies from five to six depending on whether mansard roofs are present. Photographs 9-11 show the variety of roof forms along parts of Theobald's Road in various views from Gray's Inn Walk. These photographs illustrate not only the variety of building and roof forms enclosing Gray's Inn Walk, but also the prominence of the unsightly lift overruns / plant rooms and enclosures to Nos. 28-30 and 24-26 Theobald's Road. In this context, the new fifth floor will preserve and enhance views from Theobald's Road and Gray's Inn Walk.

- The rear of the new storey also relates to the design of the adjacent library, which includes significant glazed elements - particularly its top two floors.
- There will be no adverse impact on Strategic Views (see below).
- Overall, the proposed new fifth floor will preserve and enhance the character and appearance of the Bloomsbury Conservation Area and will not have an adverse impact on the setting of Gray's Inn Walk.

Impact on Strategic View

- 6.10 UDP policy normally requires that new development should not exceed the relevant development plane. In this case, the development plane is at a height of between 52.1m AOD at St Paul's Cathedral and 66.5m AOD at Primrose Hill. The roof level of the existing building is at 39.6m AOD and the top of the lift overrun is at 42m AOD. The new fifth floor will be at 42.7m AOD. The proposed development will be well below the development plane and will have no negative impact on either the Strategic View or the Strategic View Background Consultation Area.

Rear Extension Design and Visual Impact

- 6.11 Views of the rear elevation from public areas are limited to a view of the rear third and fourth floors from John's Mews (Photographs 2 and 3). The impact of any alterations at the rear on the character and appearance of the Conservation Area will therefore be limited. In addition, the rear elevation is only seen in the context of the modern-design Council library next door.
- 6.12 The design of the rear façade will be contemporary and it will be faced in yellow stock bricks (as existing) to accord with the predominant facing material in the area, the adjacent Law Commission Offices and the nearest mews houses. Aluminium framed windows will be set back some 150mm within their reveals and grouped together with

lead panels between. This will provide the façade with a depth and horizontality which accords with the adjacent library.

- 6.13 The predominantly glazed set-back rear top floor will be visible in limited views, and when it is, it will only be seen in the context of the Council library which includes significant expanses of glazing, including its top two floors.
- 6.14 Overall, the proposed rear extension will preserve and enhance the character and appearance of the Bloomsbury Conservation Area.

Impact of Extensions and Terraces on Residential Amenity

- 6.15 The proposed roof and rear extensions will have no adverse impact on adjoining residents amenity in terms of loss of natural light, overlooking or sense of enclosure.
- 6.16 The only residential accommodation in the near vicinity of the site is on the east side of John's Mews. Windows in the rear facades of the nearest two-storey mews houses are perpendicular to the rear façade of the application building and face in a north easterly direction. In these circumstances, neither the roof extension nor the extension of the rear façade would have any material impact on levels of daylight or sunlight to habitable rooms at the rear of the mews houses. Nor would there be any adverse impact on 'sense of enclosure'.
- 6.17 The gardens to the rear of the mews houses are already overlooked from windows in the rear of the application building, from the library (including its terraces), from the Law Commission offices at 24-26 Theobald's Road / 37-38 John Street and from other properties on John Street. There would be no significant increase in the amount of glazing in the proposed rear elevation. In addition, obscure glazed balustrades to the lower half of the proposed windows will help to minimise overlooking from the new apartments. The new glazed top storey is set back 2m from the main rear building line and it will not be possible to overlook the mews gardens from inside it. An obscure glass balustrade will minimise overlooking from the rear top floor terrace when it is in use.
- 6.18 High level windows to the rear of the ground floor will prevent any overlooking from the restaurant dining room to either the mews house gardens or the proposed rear lower ground and ground floor level terraces at the application property.

- 6.19 The rear lower ground and ground floor level terraces will be separated by an obscure glass balustrade which will prevent overlooking between them. Overlooking to the mews gardens from the ground floor terrace will not be possible due to the height of the existing boundary wall between them.

Restaurant

- 6.20 This part of central London is a busy mixed commercial and residential area, but it lacks a good selection of reasonably-sized quality restaurants. In accordance with Government and local planning policies which encourage mixed use, we are therefore proposing a restaurant at part ground and lower ground floor levels.
- 6.21 Changes to the Use Classes Order will shortly introduce a new Use Class A3 for restaurants and cafés (with bars and pubs, and take-aways becoming Class A4 and A5 respectively). For the avoidance of doubt, the current proposal is for restaurant use only falling within the new Class A3.
- 6.22 In the vicinity of the site, both Theobald's Road and Gray's Inn Road are well served by sandwich shops, take-aways and public houses. However, these are very few, if any, good quality restaurants in the vicinity. In addition, there are no vacant units in the area (either within Class A3 or any other) that would be suitable for conversion to a restaurant. In these circumstances, the application building is considered to be an excellent location for the provision of a high-quality restaurant which would serve local businesses, residents and visitors to the area and also provide a destination in itself.
- 6.23 A new restaurant will introduce additional interest and street-level activity. This is particularly important in this area which is often perceived as being 'dead' during the evenings and at weekends. Restaurant use will therefore have a positive impact on the character, function, vitality and viability of the area.
- 6.24 In addition to providing an important service to local businesses, residents and visitors, a restaurant of this size will create 20-25 jobs.
- 6.25 A new restaurant will also provide a viable use for the front part of the lower ground floor which is considered to be unsuitable for residential use due to lack of adequate natural lighting and an overbearing sense of enclosure.
- 6.26 UDP policies seek to protect residents' amenity. In this respect, we note that there are limited numbers of residents living in Theobald's Road, and no existing residents

in adjoining buildings. There are also few other food and drink uses close to the site and the proposal would not therefore have any cumulatively harmful impact on amenity or on traffic / parking.

- 6.27 In order to protect the amenity of residents within the proposed residential accommodation at the application building, kitchen extract ducting will be provided to discharge fumes at roof level. This will run internally within a services duct located adjacent to the lift in order to minimise any visual impact. In addition, soundproofing will be provided between the restaurant and residential elements of the scheme in order to prevent the transmission of noise.
- 6.28 UDP policies indicate that the Council may seek to impose conditions to protect residential amenity, including limiting opening hours. We can confirm that a condition limiting opening hours to between 07.30 and midnight would be acceptable in order to protect the amenity of prospective residents within the building.
- 6.29 The new glass bridge over the front lightwell will provide level access for people with disabilities.

Design of Ground Floor / Front Elevation Alterations

- 6.30 Alterations to the front of the building at ground floor level are necessary to accommodate the new restaurant and will respect both the design and materials of the existing building and the Conservation Area context.
- 6.31 The new entrance to the restaurant will reflect the existing left-hand side entrance and will align with the grouping of windows above it. The stone cladding around and above the new entrance and restaurant window will be refurbished and remodelled in order to form keystone lintel blocks above the openings. The new glass bridge from the pavement to the new restaurant entrance will maintain the existing openness of the front light well area. The existing painted steel railings, which are not high quality and do not relate to the more traditional railings outside 24-26 Theobald's Road, will be replaced by a high quality steel and glass balustrade of a contemporary design which reflects the use of glass in the adjoining Library. Discrete angled glass canopies will mark the entrances to both the apartments and the restaurant.
- 6.32 The metal boxes / dummy balconies will be removed from below the first floor windows and the sills will be lowered in order to provide full height windows which will significantly improve the appearance of the front façade and relate it to the adjoining

24-26 Theobald's Road. The renovation and re-slating of the front dummy mansard roof and refurbishment and re-cladding of the dormer windows will also significantly improve the appearance of the front elevation.

Parking and Servicing

- 6.33 Off street parking cannot be provided in association with either the restaurant or residential elements of the proposals. However, local streets do not appear to be heavily parked and any additional resident and visitor parking could be absorbed within existing legal kerb-side spaces. We note that on receipt of this application the Council will assess overnight parking conditions in the area and, if demand exceeds 90% of the available kerb-side spaces, may seek to negotiate a car-free development or limit the proposed number of apartments.
- 6.34 Sufficient space will be provided at lower ground floor level for the storage of at least one bicycle per flat.
- 6.35 Restaurant servicing is unlikely to exceed 3-5 deliveries per day and will be undertaken by small vans, probably no larger than a transit van. Deliveries will be short in duration and undertaken from the street where restrictions outside the application building are single yellow line. We have been advised by the Council that there are no additional loading restrictions on this part of the bus lane and that loading / unloading of goods may be undertaken (for a maximum duration of 20 minutes) at any time, including when the bus lane is in operation.

7.0 CONCLUSIONS

7.1 These are highly sustainable proposals which comply with Government and London-wide objectives for the re-use of previously developed land and the conversion of unneeded commercial floorspace to residential-led mixed use. The proposals also comply with Government, London-wide and local design objectives and, in particular, the statutory requirement to preserve or enhance the character or appearance of conservation areas and to have regard to preserving the setting of listed buildings. In summary, the proposals:

- Provide a mix of commercial and residential uses within a mixed-use area which will result in additional activity and vitality, particularly in the evenings and at weekends.
- Maximise the potential of the site and provide residential accommodation at a density which conforms with London Plan and local UDP policies.
- Make use of a previously developed site which is no longer required for business purposes.
- Provide much-needed additional residential accommodation in central London with good access to public transport, jobs and services.
- Provide high quality residential accommodation in a mix of unit sizes that is suited to site conditions and the locality and which meets local needs.
- Provide an active use at ground and lower ground floor levels which will employ between 20 and 25 people.
- Result in the removal of the existing unsightly roof-top lift motor room, external plant and water tank enclosure which are visible from Theobald's Road and Gray's Inn Walk.
- Provide a new, continuous, high quality, horizontal roof form which relates to the proportions of the building below and to the adjacent library and which is set well back at both the front and the rear.
- Make a positive contribution to the roofscape of this part of Theobald's Road, which is characterised by a variety of roof heights, forms, designs and materials.

- Do not exceed the development plane of the Strategic View or have any other adverse impact.
- Improve the appearance of the front elevation.
- Overall preserve and enhance key local views, the setting of Gray's Inn Walk and the character and appearance of the Bloomsbury Conservation Area.
- Have no adverse impact on amenity for residents in the vicinity in terms of natural light, overlooking or sense of enclosure.
- Provide a new high-quality restaurant in an area with a shortage of such which would have no adverse amenity impact. Conditions can control the nature of the proposed use and hours of opening.
- Have no adverse impact on parking, traffic movement or highways safety.