

16A/B & 18 WEST CENTRAL STREET APP. REF. 2013/4275/P

LONDON BOROUGH OF CAMDEN



DEMOLITION & ENHANCEMENT

MAY 2014

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1. Introduction

This document is supplementary to the Townscape and Conservation Assessment (June 2013) and takes fully into account the subsequent correspondence and officer's reports on the heritage assessment element of the case. In particular, it responds to the email sent by Charles Rose to David Graham on 27th February 2014. The general discussion so far has been about: (i) the degree of significance of the loss proposed, through the demolition of 16a, 18 and 16b West Central Street, in respect to the conservation area and how it should be measured and; (ii) the status of the benefits which arise from the change.

2. Planning

The planning matters are informed by the relevant policy at a national and local level. In the first instance it is Section 12 of the NPPF and thereafter Camden's Local Development Framework consisting of (i) Core Strategy Policy CS14; (ii) Development Policies: DP24 and DP25 and (iii) CPG1 Design.

NPPF

The following reference to the NPPF, Section 12 are relevant to this scheme.

- Paragraph 126 makes two relevant points, one which highlights the sustaining and enhancing of the 'significance' of heritage assets and a further one which calls for the need for new development to make a positive contribution to local character and distinctiveness. The significance and contribution of both the building proposed for demolition and its replacement, have been thorough analysed.
- Paragraph 127 requires that areas justify designation through their 'special architectural or historic interest'. In this case the site neither contributes to the whole area nor the sub area on account of the sub area's poorly defined character.
- Paragraphs 128 and 129 requires the describing and identification of significance, and taking it into account in consideration of the impact, which has been done here. It is also necessary for the Council to do this.
- Paragraph 134 of the NPPF requires local authorities to reach a view as to whether change in a conservation area causes 'substantial' harm or loss, or

or whether the harm or loss is 'less than substantial'. We have determined through careful analysis, that the change causes very much less than substantial harm.

- Paragraph 137 affords support to change within conservation areas where heritage assets are better revealed. Its supports opportunities taken for new development which 'better reveal' the heritage significance in an area. In this case the replacement of 16a with a more distinct and clearly contemporary replacement, reveals the extent of the No 16 listing, and relates to its distinctive but hidden hipped roof.

Primary legislation speaks of the desirability of preserving or enhancing the character or appearance of a conservation area, recognising that it is sometimes appropriate to allow a non-functioning heritage asset to be replaced with a building of sufficient quality to enhance either the character or appearance.

Guidance on how to assess the level of contribution made, by a building, to the character and appearance of the conservation area is given at Appendix 2 of Guidance on Conservation Area Appraisals by English Heritage dated 2005. From the 10 tests which have been undertaken as part of the application, its contribution is rated as low.

A further method for determining the level of cultural importance of a heritage asset is given in English Heritage's Conservation Principles where a set of 4 categories of value are provided against which the building in question can be rated. This has also been undertaken through which the same conclusion of a low contribution results.

It is also important to understand the designation process of the conservation area in question, both for its original designation and for subsequent additional elements and their relative importance. The method of dividing up the area into sub - areas is perhaps an acceptance that its steady growth has not entirely matched the requirement for each area to have a particularly distinctive character. The sub area No 8 is, in fact, of a different character to the main part of the conservation area and, in itself, lacks a coherent character of its own, hence our earlier reference to paragraph 127 of the NPPF.

3. Relevant History of City Block (bounded by New Oxford Street, Museum Street and West Central Street)

In brief the city block has an 1840's identity, in some cases incorporating earlier buildings, and having had late 19th century and early 20th century alterations, both on the north and south side. Though the form of the city block was altered by Pennethorne's grand plan for New Oxford Street, the southern section remains in its historic form though partly incorporating the 1840 elevational treatment which followed from his plan as well as later, early 20th century work to the southern flank of West Central Street. No architects have been identified as designers of the parts relevant to the application.

4. Designation - Conservation Area

The city block lies within the southern part of the Bloomsbury Conservation Area and contributes, in a secondary way as a later classical version of Victorian origin to the much more distinctive character and appearance, of genuine Georgian streets and squares which form the principal characteristic. It is set within a sub area (No 8) of the conservation area for that reason. As a sub area, therefore, its component parts are, by implication, of less significance than the genuine Georgian streets and squares which make up the central characteristic namely, the area north of sub area No 8. This is a fact, not a judgement. The degree of importance, in relation to the whole, is less a fact and more a question of professional judgement. Loss of heritage within this block, whereby a degree of contribution, of some kind, is deemed to exist, does not need to be justified to the same degree as would be the case where the loss of a Georgian element is proposed.

Sub Area 8

The Borough has taken the step to divide the conservation area into sub-areas. For the most part these are helpful divisions. In particular Sub Areas 5 and 6, including: Gordon Square/Woburn Square/Russell Square/Bedford Square/Gower Street and the central Georgian district is that, which determines the character and appearance and distinctiveness of the area. In the case of Sub-Area 8 there is less logic. It has more the character of what is left over after other more distinct areas have been defined. It includes, for instance, the group of red brick and terracotta mansion blocks and the Shaftesbury Theatre around Grape Street, which has a character and appearance,

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stark in contrast to that of the conservation area as a whole and indeed of the subject site. If the building proposed for demolition is to be rated for its contribution to the character and appearance of the Sub-Area as a whole, then its contribution is a great deal lower. A series of photographs illustrating the variance of style, scale and use of materials is provided at Appendix 1 of this document.

5. Designation - Listed Buildings

The building proposed for demolition is not listed though it is alongside two buildings which are Grade II. These are to the north, closer to the Georgian heart than the subject buildings. Their presentation, appearance and context should be as sympathetic as possible and, in the case of the application scheme, should be enhanced beyond the level achieved by the existing building. This has been the aim, and can be judged from the accurate visual representations already submitted. The assessments made there are of relevance to this judgement. A further aspect of the enhancement is the fact that a greater distinction is then afforded to the listed building at No 16 by clarifying the limit of designation with a building which is clearly of today. In this way the true significance of the designation is revealed by replacing the neighbouring building.

6. Significance of the Buildings to be demolished

For ease of understanding the building is considered in its three postal address parts i.e., Nos 16a, No 18 and No 16b. 16a is two storeys high and turns the corner south of the listed No 16 into the east/west section of West Central Street. No 18 is part of the same building but at three storeys, No 16b is the former yard to these structures, enclosed by a wall and developed with adhoc single storey structures. The setting of this part of the conservation area is hostile and consists of sixties buildings of a much larger scale. The building proposed for demolition is the furthest south within the conservation area, therefore furthest from the principal character of Georgian streets and squares and are, as a consequence least able to contribute to the character and appearance of the conservation area as a whole. Consequently, if lost through the demolition proposed, the strength of the character and appearance of the conservation area, as a whole, would not be substantially dimin-

ished. It would certainly be an effect which is 'less than substantial' (NPPF para 134) and given all the considerations made above about its actual level of contribution and the factors needed to be taken into account to determine that level, would be very much less than substantial. The balance of public benefit necessary to justify the effect, needs only to be commensurate with that level of effect/loss, in accordance with the NPPF.

7. Analysis of the Group

The diagram provided by Squires and Partners at Appendix 2 shows how the forms of building elements fit together as part of the city block, either in groups, i.e. terraces, or as closely fit individual elements such as the listed elements. To the north-west of the site are the two distinct listed elements, Nos 43 and 45 New Oxford Street the latter being, a robust three storey corner building facing New Oxford Street and returning into West Central Street. It is experienced as a three dimensional building of clear form. No 16 to its south is hemmed in by buildings either side, lower at two storeys but with a big expressive roof with hipped ends, understood only from the street owing to the partial visibility of its roof form through the windows. The New Oxford Street range is a continuation from the corner listed building in terrace form, broken only by the weak Art Deco building at Nos 39-41. The Museum Street terrace is coherent. Between the latter and the listed building at No 16, is the subject building. It has none of the coherence or singular identity of the other elements. Its tripartite form is arbitrary and non-compositional. Its contribution to the city block group is less than all the others. Its contribution is fragmented and represents the 'service' element of the block and the lowest in the hierarchy. While this and its architectural detail provide a certain level of positive contribution to the block, it is a contribution of a low level. A statement of its level of significance is a requirement of the NPPF. Its contribution to the character and appearance of the conservation area as a whole is, therefore, at the lowest level, the only elements within the conservation area of a lower contribution being neutral or negative. It is of note that the Donald Insall report rates this element at a lower level than stated here. It classes it, in fact, as a neutral contribution.

8. English Heritage Advice and Guidance

8.1 In addition to the assessment made as part of the application, we set out below a commentary on Camden's interpretation of English Heritage's ten tests, found in Guidance on Conservation Area Appraisals dated 2005, which were set out in their January 2014 letter (incorrectly stated in the letter as 2013). These tests are a general guide to the assessment of whether a building makes a contribution to the character and appearance of the conservation area, and to what degree.

1. Is the building the work of a particular architect of regional or local note?

CAMDEN: It was known that James Pennethorne planned the overall layout of the block. Pennethorne was a prominent 19th century architect and planner and was responsible for major Metropolitan work across London. His work in this area is therefore of significance.

RCC: The answer to the question, however, is no.

2. Has it qualities of age, style, materials or any other characteristics which reflect those of at least a substantial number of the buildings in the conservation area?

CAMDEN: Yes. The facades reflect the majority of the main phase of the development in the sub area 8 of the conservation area with a subtle adornment to reflect the more functional use of the site.

RCC: But not of the conservation area as a whole. Even in the sub-area the south elevation is not reflective of other buildings and the west elevation is only to a small degree.

3. Does it relate by age, materials or in any other historically significant way to adjacent listed buildings, and contribute positively to their setting?

CAMDEN: Yes. It relates historically, by age and material and use of the nearby Grade II listed buildings at Nos.16 West Central Street, 43 and 45 New Ox-

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ford Street. Moreover the Richard Coleman City Designer Report for the 2009 application states that, "The history of No.16a West Central Street (west) is closely linked to that of its neighbour No.16 West Central Street, and the other buildings on the western side of the city block. It is likely it was one of the ancillary buildings associated with the brewery, and later spirits distillery, based at No.16 West Central Street and No.45 New Oxford Street."

RCC: We agree with this assessment.

4. Does it, individually or as part of a group, serve as a reminder of the gradual development of the settlement in which it stands, or of an earlier phase of growth?

CAMDEN: Yes. The site is the last vestige of the site as a brewer which existed on the land priorly to the new layout exists on the site today. *(These words are accurately taken from Camden's letter of 17th January 2014)*

RCC: It does not serve as a reminder of gradual development, while it expresses architecture of a light industrial nature, to the south facade, this does not exist elsewhere within sub-area 8. Its west facade is merely a lesser copy of the neighbouring listed building and therefore disguises its origins.

5. Does it have a significant historic association with established features such as the road layout, burgage plots, a town park or a landscape feature?

CAMDEN: The building does form part of the original James Pennethorne planned layout of the block for which Nos.16 West Central Street, 43 and 45 New Oxford Street are statutorily listed.

RCC: The building proposed for demolition follows a street pattern which predates Pennethorne, but this is not of great significance.

6. Does the building have landmark quality, or contribute to the quality of recognisable spaces, including exteriors or open spaces within a complex of public buildings?

CAMDEN: No. The building has no landmark qualities. It is located on a minor street.

RCC: We agree with this assessment.

7. Does it reflect the traditional functional character of, or former uses within, the area?

CAMDEN: Yes. The facade of the building does reflect a commercial/light industrial use which would have historically been the function of site. This is a reflection of the historic development and growth of the wider area.

RCC: We agree but judge this to be of minor significance.

8. Has it significant historic associations with local people or past events?

CAMDEN: The site has as an association with brewery, a railway office, a post office and most recently a night club. On a local level, these are representative of historic land uses and prominent commercial operations that contribute to the history and character of the conservation area. This underlines the site's historic and communal value.

RCC: The answer is the building has no associations with local people or past events.

9. Does its use contribute to the character or appearance of the conservation area?

CAMDEN: Yes. As identified in the adopted Bloomsbury CAAMS.

RCC: Its most recent use detracts from the character and appearance, the use is not referred to in the Bloomsbury CAAMS.

10. If a structure is associated with a designed landscape within the conservation area, such as walls, terracing or a minor garden building, is it of identifiable importance to the historic design?

CAMDEN: N/a.

CAMDEN's Conclusion: The site is considered to meet 7 of the 9 possible criteria resulting in it making a positive contribution the area. The proposed development has failed to accurately assess the significance of the site identifying that it only meets 2 of the 10 criteria and contradicting information set out in earlier documents relating to past planning applications for the site. Moreover the proposal failed to appropriately distinguish 16a and 18 from 16b in analysis and assessment.

RCC: Camden's assessment is inaccurate, as shown with the above commentary. Only in two of the tests is there a positive result, but in neither case is the positivity compelling. The degree of contribution made, can only be described as limited. We agree with Camden that there is a positive contribution. Camden have not sought to identify the degree of contribution- which is a necessary step in order to assess whether the degree of harm caused outweighs the design and public benefit of the new scheme. We have, as a result of careful analysis. To distinguish between 16a, 18 and 16b is not helpful. The heritage asset is a single building plus a former, now built on yard. It is a single entity.

8.2 English Heritage's Conservation Principles Values (June 2013)

An assessment of the building follows, utilising English Heritage's *Conservation Principles* document. The document, published in July 2009, aims to support the analysis of heritage assets to ascertain their true cultural value. This is particularly explored in the section 'Understanding Heritage Values' and provides four divisions to reveal aspects of value which can then be objectively examined.

While the 'values' considerations were included in the planning submission, what an analysis of these values is missing in English Heritage and Camden's assessment. The four aspects are examined below objectively, in relation to the value of redevelopment:

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Evidential Value**EH ADVICE**

"Evidential value derives from the potential of a place to yield evidence about past human activity". Evidence of past human activities, including physical remains or genetic lines, are considered a means "to contribute to people's understanding of the past". When written records are not available, archaeology, geology, and habitats can also be considered as sources of information on the evolution of the place. Evidence is best assessed in situ avoiding removal or replacement."

Comment:

The evidential value is primarily related to archaeology. In this case it is limited to appearance, style and materials, none of which are of an extraordinary or significant in 'evidential' terms. The style in particular is imitative of other buildings and does not reflect the age of the building. The present status of the former yard also gives rise to a low if non-existent evidential value.

Historic Value**EH ADVICE**

"Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present". This evidence is taken to be generally illustrative or associative. Illustrative values of places are considered greater if they incorporate the first, or only surviving, example of an innovation related to design, technology or social organisation. "Historical value can also be through the association with notable individuals or group of individuals, or associations with cultural heritage such as literature or film. Historical values are harmed only if adaptation to new circumstances has obliterated or concealed them.

Comment:

No special associations to historical events or people are known other than passed uses such as a brewery, a railway office, a post office and most re-

cently a night club. These are not of significance in relation to the advice above, nor are they particularly represented in the architecture.

Aesthetic Value**EH ADVICE**

"Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place." Aesthetic values are drawn from the design or artistry involved in the creation of a place and from the way in which a place has evolved and has been used over time. Design values include: composition; views; materials; detailing; craftsmanship; the intellectual programme governing the design; and the choice or influence of sources from which they derived. Value is found in associations to a known patron, architect, designer or craftsman, or in the association with a vernacular tradition. Strong indicators of importance are quality of design, execution and innovation. Aesthetic values may also develop by chance, resulting from the action of nature on human works and the passage of time ('the patina of age'). They include: urban or rural landscaping; the relationship of vernacular buildings to their setting; and the juxtaposition of vernacular or industrial buildings. While aesthetic values may be related to the age of a place they may also be amenable to restoration and enhancement."

Comment:

The exterior of the building reflects some of the features of adjacent buildings and to some extent within a vernacular tradition, but the architecture is derivative and unimpressive. Window openings have been blocked up and crude industrial shutters have been added to serve the current use. The general quality of the composition, materials and detailing are not of great significance and certainly involve no innovation. The design is not by an architect of note and the aesthetic value does not warrant any particular attention.

Communal Value**EH ADVICE**

"Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory". Commemorative and symbolic values reflect the meaning of a place for those who draw part of their identity from it, or have emotional links to it such as war and other memorials. Social value is associated with identity, distinctiveness, social interaction and coherence and can also be expressed through regional and national identity. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place and can be associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life."

Comment:

The site is a commercial building which has no landmark or symbolic qualities and does not provide any wider community service. While past uses have had some communal value the recent legal use as a night club has been at the detriment of the community.

- 8.3 The assessment already made under English Heritage's Conservation Principles and reinforced here, shows that there is very little cultural value to the building. Camden disagree but do not appear to have applied the correct criteria.
- 8.4 A considered balance between the modest contribution made by the existing buildings and the benefits of enhancement through replacement, has not been fully undertaken by Camden.
- 8.5 The loss of this modest contribution which, given the analysis undertaken, is less than substantial in NPPF terms, is balanced against:
- Improved active frontage.
 - High quality architecture.
 - More classically composed street elevations.

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- Uses which are more sensitive to the area.
- Townscape which better protects the listed buildings from the insensitive setting to the south.

8.6 This balance, more than justifies the decision to enhance rather than preserve, the character and the appearance of the conservation area. This is a legitimate approach to development proposals as set out in primary legislation, and supported by the NPPF.

9. Camden's Recommendations

In regard to Camden's Recommendation 3, that.

"16 and 18 West Central Street are considered to make a positive contribution to the character and appearance of this section of the conservation area characterised by earlier commercial buildings brought about by the laying out of New Oxford Street as well as the setting of the adjoining listed buildings. Insufficient weight has been given to architectural and historic value of 16a and 18 West Central Street."

RCC: We agree that there is a positive contribution, but that its significance is low and that its demolition represents a loss which is 'less than substantial'. The correct weight has been given to this contribution by the balance of benefits which enhance the present condition. Camden criticize the 'weight' we give but do not themselves identify the degree of contribution. The contribution to the setting of the listed building is one of ambiguity. To replace it with a sympathetic alternative reveals a greater significance to the listed building by providing greater clarity of what the listed building actually is and improving its setting by reducing the dominance of the modern tower block in the immediate backdrop.

Recommendation 4.

The façade and diminutive scale of 16b makes a minor contribution to the block and this section of the conservation area. Insufficient weight has been given to architectural and historic value of 16b West Central Street

RCC: We agree that No 16b makes a minor contribution. 16b is however one element of a single building and is not clear why the contribution by other elements of the building are not similarly rated. Sufficient weight has been given to this and other minor contributions in accordance with the NPPF.

Recommendation 5.

The height of the new development fails to preserve or enhance the character and appearance of the conservation area.

RCC: The height of the development does indeed enhance, as can be seen in Views A and B of the submission, where the extra height works to the advantage of the remaining heritage assets by shielding them from the larger scale buildings and reducing their impact on the settings. These views can be seen at Appendix 5 of this report.

Recommendation 6.

The justification for demolition fails to provide satisfactorily public benefit to outweigh the harm caused to the character and appearance of the conservation area.

RCC: Camden have not analysed adequately the weight or level of contribution made. Neither have they analysed the public benefit fully. Had they done so, the satisfactory balance between loss and gain would have been apparent.

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10. Conclusion

In this paper, the analysis of the existing building, proposed for demolition, and the level of its contribution to the Bloomsbury Conservation Area, is set out taking into consideration a number of factors.

First is the area to which it relates. If it is to be judged against the Conservation Area as a whole, its contribution, though positive, is minor. This is because of the constant growth of the conservation area over the years and the general weakening of character at the periphery in relation to the original, central part. If it is to be judged against the sub-area No. 8, then this area is so diverse in character that the contribution is again minor owing to the total lack of a distinctive character across it.

Second, there is the methodology provided for making the judgement found in the two guidance documents provided by English Heritage, i.e. the 10 tests and the 4 'value' considerations set out in section 8.

Taken carefully, this paper and the previous submission analyse the two sets of tests according to the wording provided by English Heritage. In this way we show that the positive contribution made by the building in question is of a low order.

It is the NPPF which tells us that the level of significance of a heritage asset is important to establish and we have established it here.

A further aspect is the relationship between the building and the listed buildings to the north. The fact that the replacement building reveals and clarifies the significant element of the listing and reduces the current ambiguity is a heritage advantage. This relates to the chapter on 'Conserving and enhancing the historic environment' of the NPPF, where it advises authorities to favour proposals which better reveal the features of a designated heritage asset.

Finally, the benefits of the proposal must also be analysed and this is carried out at section 8.5. In particular the benefit to the setting of the listed buildings must be emphasised here. As is shown on the front of this document, in the before and after image of the view south along West Central Street, the new building shields and embraces the listed buildings in the foreground,

against the large scale wider setting, to their great advantage.

This report explains why we believe the existing building makes a minor contribution to the conservation area. It addresses the case for demolition and the value of the proposed new building, through thorough analysis and that we believe will help Camden's planning officers to evaluate the conservation aspects of the proposals.

APPENDIX I

PHOTOS ACROSS SUB AREA 8

These photographs illustrate the diversity of characteristics in Sub-Area 8. With such a lack of an identifiable distinctive character the task of analysing whether any loss constitutes either substantial or less than substantial harm, is rendered meaningless. This is why paragraph 138 of the NPPF is so worded.



1 View looking west from the junction of New Oxford Street and Dyott Street.



2 View looking north from the junction of Dyott Street and Bucknall Street.



3 Dyott Street looking south.

PHOTOS ACROSS SUB AREA 8



4 View looking north from Shaftesbury Avenue at junction with New Oxford Street.



5 View looking from St Giles High Street at junction with Bloomsbury Street, Shaftesbury Theatre on the west.



6 Great Russell Street, southern flank.



7 The canyon like effect of buildings along Banbridge Street.



8 Bedford Court Mansions.



9 New Oxford Street at junction with Earnshaw Street looking east.



10 High Holborn at junction with Southampton Place looking west.



11 Sicilian Avenue in the eastern periphery of the sub-area.



12 Grape Street looking south towards St Giles High Street.

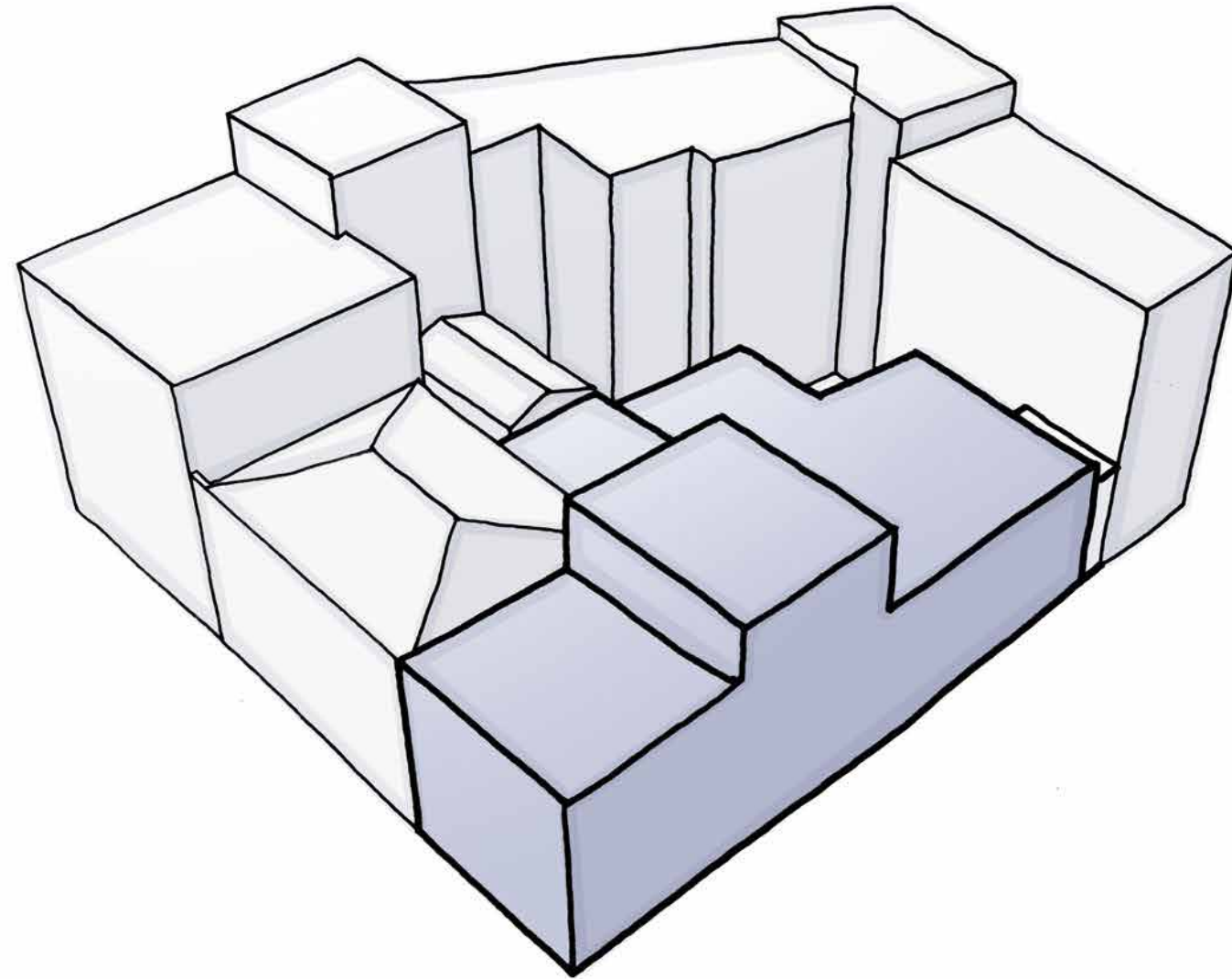


13 View looking at the north-east corner of Tottenham Court Road and New Oxford Street.

APPENDIX 2

VIEW OF ELEMENTS FROM THE SOUTH-WEST, SQUIRE & PARTNERS

The diagram shown on this page is provided to show how the individual elements of the city block are arranged and how the subject building, shaded, is a building of less clear definition than other elements. This relates to the text set out in section 7 of the document, and should be read in conjunction with it.



APPENDIX 3

REUSE OF THE EXISTING BUILDING

The existing building has a unique and unusual form. The basement and ground floor are extensive, while the first and second floors are significantly smaller. As a consequence over a third of the accommodation is at basement level, and much of the accommodation at ground level is deep within the site and a long way from an external wall. The accommodation above ground is limited, currently accessed from a small winding stair on the West Central Street frontage.

Existing Floor Areas

Floor	Area	
Basement	467 sqm	37%
Ground and Mezzanine	569 sqm	44%
First	164 sqm	13%
Second	79 sqm	6%
Total	1,279 sqm	

This imbalance in floor areas means that uses that can take advantage of the area at ground and basement must take priority in a financially stable operation of the site. This has led to the site historically being used as a nightclub and bar at basement and ground, with ancillary offices and stores above ground. While these uses do occupy the upper levels of the site, the anti-social nature of the night club and bar uses effectively prevent other potential uses of the site, and also have a detrimental impact on the surrounding community.

While there may be potential to extend the existing building in two locations, on the corner of West Central Street and in the middle of the site, these provide limited opportunities for new floor area. Existing windows in the rear of 10-12 Museum Street and 35-41 New Oxford Street provide daylight to residential uses, and constrain the development potential to the rear. This means that the floors remain small, limiting the viability of new modern lifts and stair and constraining the value of the space. As a consequence the amount and value of accommodation at lower levels remains high in proportion to the whole site, and the conflict between the use for this space at lower level and any potential new accommodation above remains.

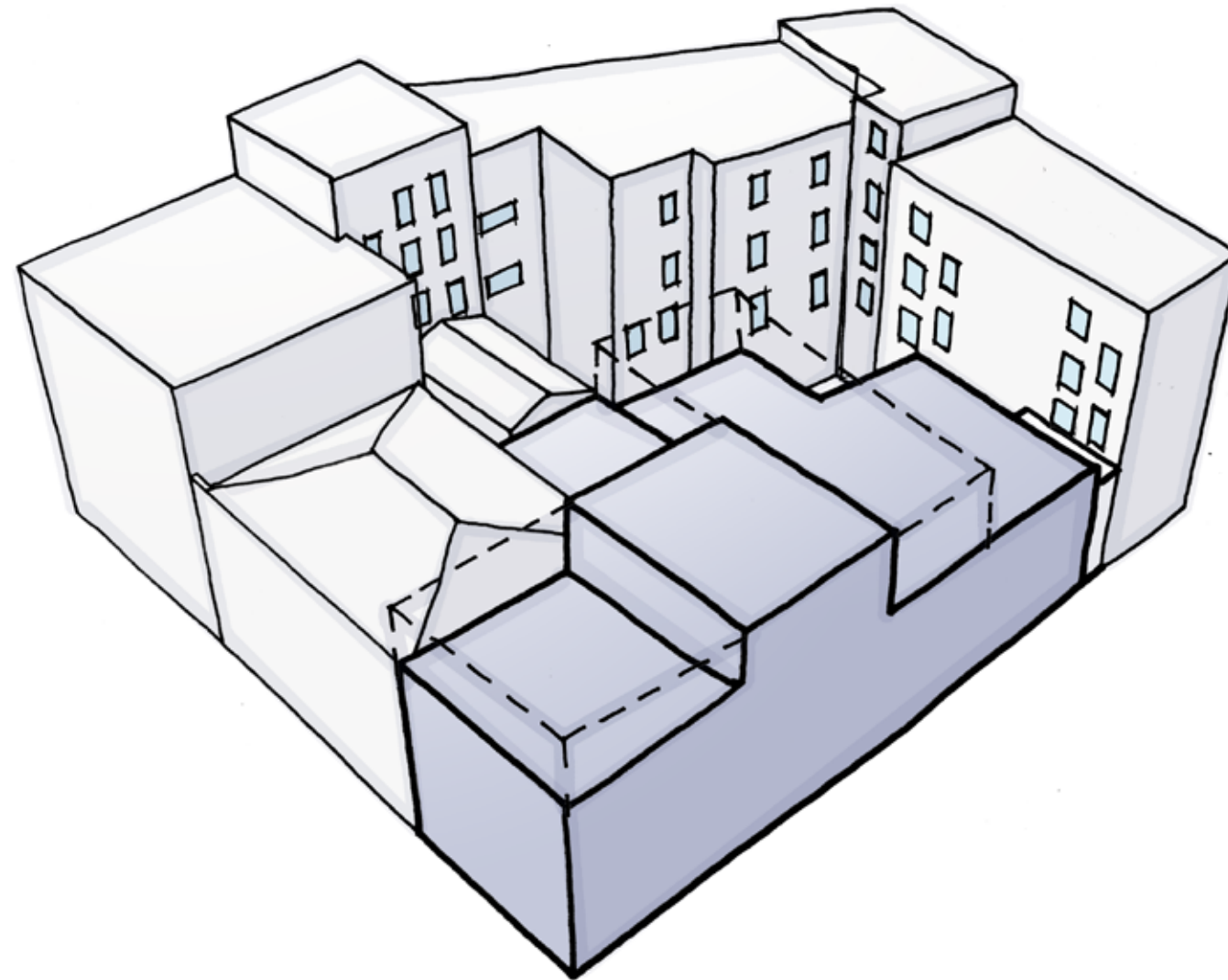


Figure: Diagram illustrating development potential and surrounding windows.

APPENDIX 4

CAMDEN'S PLANNING POLICIES

A.1 Camden Core Strategy Local Development Framework 2010-2025 adopted 8th November 2010

Policy CS14 focuses on promoting high quality places and conserving heritage by ensuring that new development will be of the highest standard of design that respects local context and character, preserving and enhancing heritage assets and their settings which include conservation areas, listed buildings, etc.

Response:

The new design is of a high quality derived from its context, representative of its use and is of high quality materials.

Camden Development Policies adopted 8th November 2010

Camden's Development Policies forms part of the Council's Local Development Framework (LDF), the group of documents setting out Camden's planning strategy and policies.

A.2 **Policy DP24** relates to securing high quality design.

Response:

Again, the design is of a high quality.

A.3 **Policy DP25** Conserving Camden's Heritage helps to implement CS14.

Conservation areas In order to maintain the character of Conservation Areas, conservation area statements, appraisals and management plans should be taken into account. The development should preserve and enhance the character and appearance of the area, prevent total or substantial demolition of an unlisted building that makes a positive contribution to the character and appearance of the conservation area where this harms the character and appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention; and preserve trees and gardens spaces which contribute to the setting.

Response:

The development preserves character and appearance though with a new building. The design is derived from the Classical tradition, which is at the heart of the character of the conservation area. Its higher status and quality also enhances the character and appearance.

A.4 **Listed buildings** The Council will prevent the total or substantial demolition of all listed buildings unless exceptional circumstances are shown. Only consent for a change of use or alterations and extensions to a listed building will be granted and development considered to cause harm to the setting of a listed building will not be permitted.

Response:

The setting is enhanced as can be seen in views A & B on pages 26-29 of the Townscape and Visual Impact Assessment, which was submitted with the application.

Supplementary Planning Document (SPD)**A.5 Camden Planning Guidance 1 (CPG1) - Design, 2011****Context**

2.9 states that *Good Design must positively enhance the character of existing buildings, other buildings in the surrounding area, and any strategic or local views, particularly in conservation areas.*

Response:

The enhancing high quality design achieves these objectives.

Materials

2.12 states that, *materials should form an integral part of the design process and should relate to the character and appearance of the area, particularly in conservation areas or within the setting of listed buildings.*

Response:

The materials relate to the status of the building and its context.

3.4-3.10 Conservation Areas states that development within conservation areas and affecting the setting of conservation areas will only be permitted when it preserves and enhances the character and appearance of the area, referring to Planning Policy Statement 5 (PPS5), policy HE8.

Response:

The design enhances in the ways stated above.

APPENDIX 5

8.0 ASSESSMENT OF BEFORE AND AFTER VIEWS

View A - West Central Street, looking south



Existing

The street is formed of a composite elevation with the two parts of the listed building in the foreground. The un-listed component at the far end is of the same architectural style, materials, form of fenestration and rhythm as the listed buildings. Its main differences are: the semi-blind window openings; the poor quality internal spaces which they serve; the subtle difference in the parapet detail and the lack of a crowning roof form.

Rather than support the setting of the listed buildings, it diminishes their value by continuing rhythm, but in a diluted fashion. The impact of the Travelodge behind, is profound and disturbing, and has a direct impact on the setting of the conservation area and on the skyline of the listed building.

Proposed

The new four storey element provides a distinct end to the street facade. It defines the extent of the listed buildings. It is made of material which is superior to the current painted surfaces. It embodies a vertical hierarchy within the elevational treatment. It reduces the impact of the Travelodge, seen as a backdrop, on the listed elements of the street. It enhances the street and therefore the sub-area of the conservation area. The fifth storey pavilion is largely obscured.

Effect

The new building means that the character and appearance is enhanced rather than preserved, at a point where the appearance is particularly fragile and vulnerable to its aggressive setting.





VIEW A: PROPOSED

APPENDIX 5

8.0 ASSESSMENT OF BEFORE AND AFTER VIEWS

View B - New Oxford Street, looking south



Existing

Looking south across New Oxford Street from the main conservation area towards the satellite block which forms part of it, the townscape scene is one of a rather incoherent group of buildings with a backdrop of taller buildings. The listed buildings in the foreground have a challenging wider setting but are strong enough in character and as a group, to maintain their dignity. The adjoining buildings, to their right provide a fragmented immediate setting, being of diminutive height. This allows the Travelodge Hotel to radically intrude on the group. The skyline is a stark assemblage of contrasting parts with little value.

Proposed

The proposal adds greater substance to the foreground group. First, the terrace to the left of the listed buildings is made complete and of greater substance. The elevation to West Central Street is added to, effectively balancing the composition in relation to the listed buildings. As a taller element in the backdrop it adds to the skyline such that there is less of an intrusion from the Travelodge Hotel. The traditional drop in height between the frontage buildings and the developed rear is maintained.

Effect

The change enhances the character and appearance of the conservation area and improves the setting of the listed buildings. The balancing of the elevation on West Central Street supports the setting of the listed buildings and reduces the intrusion of the higher building beyond the site to form a better foreground composition. It is also a building of considerable architectural quality, and provides a mediating element between the otherwise over contrasting existing elements.

