

Planning, Design, Access and
Heritage Statement
The Rotunda Complex, 42-43 Gloucester
Crescent

May 2014

Turley

Contents

1.	Introduction	1
2.	Key Considerations	3
3.	Context	4
4.	Proposed Development	7
5.	Assessment	8
6.	Conclusions	9
Appendix 1: Planning and Heritage Policy Context		10
Appendix 2: Acoustic enclosure example		16

1. Introduction

- 1.1 This Statement has been prepared on behalf of Hermes Real Estate Investment Management Ltd in support of applications for full planning permission and listed building consent at the Rotunda Complex, 42-43 Gloucester Crescent (the 'Site' or 'Application Site') for the following:

'Relocation of 10 no. existing Air Handling Units and erection of associated acoustic housing' (the 'Proposals' or 'Proposed Development')

- 1.2 The existing Air Handling Units (AHUs) meet the requirements of the current B1 office use at the Site. After previous discussions with Officers at Camden Council, we now seek to rationalise the location of the AHUs to provide a scheme which is preferable in both aesthetic and acoustic terms.
- 1.3 This Statement describes the Proposals, justifies the scheme in planning terms and represents a Design and Access Statement meeting the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended).
- 1.4 As the proposals involve works to a grade II listed building located within a conservation area this Statement also describes the significance of the heritage asset affected to a level of detail proportionate to its importance and the nature of the proposals to meet the requirements of the National Planning Policy Framework (NPPF).

Pre-application Advice

- 1.5 During our initial pre-application discussions and an on-site meeting with John Nicholls and Antonia Powell on 26th February 2014, the principle of relocating the AHUs and providing acoustic housing was agreed and the scheme we now present was considered acceptable.

Application Pack

- 1.6 This submission has been made via Post and is accompanied by the following:
- Application Form;
 - Planning, Design, Access and Heritage Statement, prepared by Turley (this document);
 - Acoustic details, prepared by Allaway Acoustics Ltd, as follows:
 - Rectangular Attenuator data sheet A02E;
 - Acoustic Louvre Model EP50/UF data sheet L60D; and
 - Acoustic Enclosure Panel Model EP50/UF data sheet E40c.
 - Drawings, prepared by Workman, comprising:
 - Existing and Proposed Layouts (L120652-01);
 - Existing and Proposed Elevations (L120652-02);
 - Site Location Plan (L120652-03);
 - Block Plan (L120654-04); and
 - Proposed Elevations with Acoustic Housing (L120652-05).

1.7 Payment of the statutory application fee of £385 is made via cheque to accompany this application.

2. Key Considerations

2.1 The design and access objectives of the Proposals are to improve the standards of amenity, design and layout to better accord with the significance of the conservation area and listed building. How the proposals respond to these objectives is fundamentally shaped by our appraisal of the Site's context and discussions with Officers.

2.2 The key design and access considerations which have shaped the Proposals are accordingly:

- The overall design approach and relationship with the Conservation Area and Grade II listed building; and
- Amenity considerations.

3. Context

3.1 In appraising the context of the development we have:

- carried out a review of the Site and its contribution to its surroundings;
- reviewed the Site's planning history;
- reviewed the key planning policy considerations; and
- held pre-application discussions with the Council to discuss our Proposals.

Site and Surroundings

3.2 The Proposed Development sits in the western part of the Rotunda Complex, a Grade II listed building located north of the junction of Gloucester Crescent and Oval Road. The Site is located within the Primrose Hill Conservation Area.

3.3 While the Rotunda Complex itself is currently in Class B1a use, the surrounding area is predominantly residential.

3.4 The Site falls within the administrative and planning boundary of the London Borough of Camden.

Planning History

3.5 As noted in our pre-application discussions, planning and listed building consent (PEX0000694 & LEX0000695) was granted by your Council on 19 September 2001 for alterations to existing air conditioning units at rear ground floor level. The permissions allowed for x1 floor mounted condenser unit; x2 floor mounted condenser units side by side and x1 wall mounted condenser unit located to the rear of the Rotunda Building.

Key Planning Policy Considerations

3.6 Camden Council's Core Strategy requires that development preserves and enhances heritage assets and is of a high standard of design that respects local context and character.

3.7 Camden's Development Policy DP24 requires that all developments, including alterations and extensions to be of the highest standard of design, whilst considering the character, setting, context and the form and scale of neighbouring buildings.

3.8 In terms of preserving Camden's heritage, Policy DP25 states that the Council will only permit development within conservation areas that preserves and enhances the character and appearance of the area.

3.9 In respect of the Grade II listed Rotunda building, the policy continues to state that the Council will not permit development that it considers would cause harm to the setting of a listed building.

- 3.10 Policy DP26 of Camden's Development Policies states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity, including noise and vibration levels.
- 3.11 In terms of promoting sustainable design and construction, Policy DP22 of Camden's Development Policies requires development to incorporate sustainable design and construction measures.
- 3.12 The full planning policy context for these proposals can be found in Appendix 1.

Heritage Significance

- 3.13 The NPPF defines the significance of a heritage asset as:

"The value of heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance also derives not only from a heritage asset's physical presence, but also from its setting"

- 3.14 Listed buildings are designated heritage assets that hold special architectural or historic interest. Conservation areas are designated if they are of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance.

Listed Building: Rotunda Building (former Piano Factory Building), Oval Road

- 3.15 The List Entry description for the listed building states:

Piano factory, now offices. 1852. By Thomas and William Piper. For piano manufacturers Messrs Collard and Collard. English bond yellow stock brick; roof not visible. Circular plan. EXTERIOR: 5 storeys. 22 bays, each bay divided by raised pilaster continued to moulded stucco entablature and gablet projecting beyond splayed stucco cornice. Stucco pilasters flank segmental-arched 1st floor doorway. Segmental brick arches over wood and iron casements. Rectangular addition, dating from before 1868 and housing staircase to rear. INTERIOR: cast-iron columns and beams to vaulted brick ceilings; cast-iron columns, each with moulded plinth and capital, surround blocked-in central well; iron king post trusses radiate from central well; addition houses open-well staircase with simple iron balustrade and cantilevered stone treads, and has stone flag flooring. HISTORICAL NOTE: the open well was used for moving the pianos from floor to floor, with a former hoist, during the manufacturing process. The lowest floor was used for drying, the next for upright pianos, the second floor for cleaning, the third for polishing the cases and those above for "belly" manufacture and finishing off. Collard and Collard were the oldest of the well-known piano manufacturing firms of the St Pancras area, having patented a form of upright "square" piano in 1811. This building replaced a similarly shaped one which was destroyed by fire a year after it was built in 1851.

- 3.16 The listed building's significance can be summarised as:

- **Architectural Interest** – of importance for its distinctive architectural design of five storeys and 22 ordered bays, as a piano factory, retaining elements of original plan form and structure functionally related to this former use.
- **Historic Interest** – of some importance in illustrating an important former industry of the area.

Primrose Hill Conservation Area

- 3.17 The conservation area was first designated in 1971 and subsequently extended in 1985 and is primarily made up of a series of well laid out later C19th terraced houses, or residential character with the vestiges, such as the Rotunda Building of former industrial uses. The Site is located within the Gloucester Crescent sub-area as identified by the local planning authority's Conservation Area Statement.
- 3.18 This sub-area is noted to have abundant trees and vegetation and a lower density of development in comparison with the main body of the conservation area. The majority of buildings are set back from the highway with large front gardens. The old Piano Factory building is located on the corner of Gloucester Crescent and Oval Road and is noted as a particularly distinctive building due to its corner location, size and height. The building makes a positive contribution to the significance of the conservation area.

Key Heritage Considerations

- 3.19 The heritage policy and guidance context for consideration of the application proposals is set out in full in Appendix 1 of this report. This includes the statutory duties of the Planning (Listed Building and Conservation Areas) Act 1990¹, national policy set out in the NPPF², Local policy is set out above.

¹ HMSO, The Planning (Listed Buildings and Conservation Areas) Act 1990

² DCLG, National Planning Policy Framework (NPPF) 2012

4. Proposed Development

- 4.1 This Statement has identified key design and access objectives and key considerations and then appraised the relevant context. This section describes the Proposals and how they respond to the above.

Response to Objectives, Considerations and Context

- 4.2 In summary, the Proposals have fundamentally responded to the objectives, considerations and context by:

- Being designed to preserve if not enhance the contribution of the Site to the Conservation Area and the Grade II Listed Building;
- Ensuring no materially adverse effects on the amenity of the Site and its neighbours; and
- Achieving the relevant environmental standards.

Proposed Development

- 4.3 The Proposals seek to relocate the 10 no. existing Air Handling Units at the Site and provide an associated acoustic housing.

- 4.4 We have sought to locate the ten air handling units into three clusters as follows:

- The two freestanding Daikin Air Handling Units along the Existing Elevation A (as shown on Drawing Number: L120652-02) will be relocated from their existing position in to a new purpose built enclosure adjacent to the lift shaft (Drawing Number: L120652-02).
- Five of the remaining units as shown on Existing Elevation A (Drawing Number: L120652-02) will be rationalised in front of the white washed window as shown on Proposed Elevation A (Drawing Number: L120652-02) .
- The remaining three units will be relocated as shown on Proposed Elevation B (Drawing Number: L120652-02).

- 4.5 These will all be held within an enclosure which has been designed to screen the units both aesthetically and acoustically whilst ensuring sufficient air flow is provided (details of the housing enclosure are provided with this submission). A design example is enclosed in Appendix 2. In addition, information pertaining acoustic performance standards is also enclosed.

5. Assessment

Overall design approach

- 5.1 The Proposals include an enclosure which screens the units both aesthetically and acoustically. The specification chosen demonstrates an appropriately high standard of design of an appropriate form and scale to preserve and enhances the character and appearance of the area.

Amenity considerations

- 5.2 The proposed enclosure meets the acoustic performance standards necessary to provide an acceptable standard of amenity to surrounding occupiers with respect to noise and vibration levels.

Heritage

- 5.3 The application proposals will re-order and relocate the air-conditioning units to sit within one structural bay of the listed building which in turn will be enclosed by an acoustic screen. The visual impact and appearance of the units will be minimised to the extent that they do not detract from the significance of the listed building and its role within the wider conservation area.
- 5.4 The proposals will therefore meet the objectives of the duties of the 1990 Act and national planning policy with respect to the historic environment. Specifically, the proposals will sustain and conserve the significance of the heritage assets and thereby preserve their special interest, also satisfying the requirements of local policy.

6. Conclusions

- 6.1 The Proposals are considered to fully comply with all relevant planning policies contained within the Development Plan. Furthermore, the proposals are considered to embrace the Government's overarching aim of achieving sustainable development as contained in the National Planning Policy Framework.
- 6.2 In design terms, the proposals have been carefully considered to provide a high quality and well integrated design solution. The proposals will also sustain and conserve the significance of the heritage assets and thereby preserve their special interest, also satisfying the requirements of local policy. As the Proposals seek to provide a layout for the AHUs which is preferable in acoustic terms and as a result, the Proposals will also have an acceptable impact on the amenity of the surrounding area.
- 6.3 Given the above, it is considered that no material planning reasons exist to preclude the grant of planning permission.

Appendix 1: Planning and Heritage Policy Context

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990

1. The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that listed building consent is required for;

“s.7 ... any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest ...”
2. In determining such applications the following duty is placed upon the decision maker:

“s.16(2) In considering whether to grant listed building consent for any works the local planning authority, or as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”
3. With regard to applications for planning permission affecting the setting of statutory listed buildings:

“s.66(1) In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”
4. With regard to applications for planning permission within conservation areas, it is set out that:

“s.72(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”
5. Importantly, the meaning of preservation in this context, as informed by case law, is taken to be the avoidance of harm.

National Planning Policy Framework (NPPF)

- 6.4 The NPPF advises that the *“presumption in favour of sustainable development”* should be a *“golden thread running through both plan-making and decision-taking”* and should be applied by local planning authorities in assessing and determining development proposals.
- 6.5 The *“three dimensions of sustainable development: economic, social and environmental”* are to be balanced and not treated in isolation (paragraph 7). The

adverse impacts of development should only carry weight where the adverse impacts of allowing the development would significantly and demonstrably outweigh the benefits of the proposal. A scheme might therefore be sustainable even if there is a conflict with one aspect of policy.

- 6.6 As a result, *“unless material considerations indicate otherwise”*, Local Planning Authorities should *“approve development proposals that accord with the development proposals without delay”* (paragraph 14).

Requiring Good Design

- 6.7 Paragraph 56 of the NPPF states that:

“The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.”

- 6.8 More specifically, paragraph 61 notes that:

“Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations.”

Conserving and enhancing the historic environment

- 6.9 The National Planning Policy Framework (NPPF) was introduced in March 2012 as the full statement of Government planning policies covering all aspects of the planning process. One of the twelve core planning principles of the NPPF 2012 is that planning should:
- 6.10 *“Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.”*
- 6.11 The glossary of the NPPF (Annex 2) defines conservation as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
- 6.12 Chapter 12 of the NPPF outlines the Government’s guidance regarding conserving and enhancing the historic environment in more detail.
- 6.13 Paragraph 128 requires the significance of the heritage assets, which may be affected by the proposals to be described as part of any submission, ideally as part of a Heritage Statement report. The level of detail should be proportionate to the importance of the assets and sufficient to understand the potential impact of the proposals on their significance.
- 6.14 Paragraph 129 sets out that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

- 6.15 Paragraph 131 states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of all heritage assets and putting them into viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality, and the desirability of new development making a positive contribution to local character and distinctiveness.
- 6.16 Paragraph 132 further outlines that local planning authorities should give great weight to the asset's conservation when considering the impact on a proposed development on the significance of a designated heritage asset, such as the listed building and conservation area. The more important the heritage asset, the greater the weight should be. It is also specified that any harm to, or loss, of significance of a designated heritage asset should require clear and convincing justification.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

- 6.17 Paragraph 93 states that:

“Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.”

London Plan

- 6.18 The London Plan (2011) provides a spatial strategy which sets out the growth of London to 2031. The London Plan draws together social, environmental and economic policy to create a London-wide approach to strategic issues.

Design

- 6.19 London Plan Policies 7.1 to 7.3 set out the approach to ‘place shaping’. Policy 7.1 ‘Building London’s Neighbourhoods and Communities’ seeks to secure good quality and attractive environments. New development should be designed to interface with the existing uses and should respond positively to the local context, while enhancing character, legibility and accessibility.
- 6.20 London Plan Policy 7.4 ‘Local Character’ requires development to have regard to the *‘form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.’*
- 6.21 Policy 7.6 ‘Architecture’ requires development to make a positive contribution by incorporating *‘the highest quality materials and design appropriate to its context.’*

Camden Core Strategy

Policy CS14 (Promoting high quality places and conserving our heritage)

- 6.22 Under Policy CS14 “the Council will ensure that Camden’s places and buildings are attractive, safe and easy to use by”:

- (a) Requiring development of the highest standard of design that respects local context and character;
- (b) Preserving and enhancing Camden's rich and diverse heritage assets and their settings, including Conservation Areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
- (c) Promoting high quality landscaping and works to streets and public spaces;
- (d) Seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;
- (e) Protecting important views of St Paul's Cathedral and the Palace of Westminster from site inside and outside the Borough and protecting important local views.

Camden Development Policies

Policy DP22 (Promoting sustainable design and construction)

- 6.23 This policy requires development to incorporate sustainable design and construction measures. Schemes must demonstrate how these have been incorporated within the design and proposed implementation. This will be measured against the following:

“expecting developments (except new build) of 500 sq m of residential floorspace or above or 5 or above dwellings to achieve “very good” in EcoHomes assessments prior to 2013 and encouraging “excellent” from 2013.”

- 6.24 The Council also require development to be resilient to climate change by including adaption measures such as:

*“Summer shading and planting;
Limiting run off;
Reducing water consumption;
Reducing air pollution; and
Not locating vulnerable uses in basements in flood prone areas.”*

Policy DP24 (Securing high quality design)

- 6.25 Policy DP24 relates to high quality design and states that the Council “will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider”:

*“a) character, setting, context and the form and scale of neighbouring buildings;
b) the character and proportions of the existing building, where alterations and extensions are proposed;
c) the quality of materials to be used;
d) the provision of visually interesting frontages at street level;
e) the appropriate location for building services equipment;
f) existing natural features, such as topography and trees;
g) the provision of appropriate hard and soft landscaping including boundary treatments;
h) the provision of appropriate amenity space; and
i) accessibility”*

Policy DP25 - Heritage

6.26 Policy DP25 considers the conservation of the Borough's heritage and states that in relation to Conservation Areas, the Council will:

- (a) *"take account of Conservation Area statements, appraisals and management plans when assessing applications within Conservation Areas;*
- (b) *only permit development within Conservation Areas that preserves and enhances the character and appearance of the area;*
- (c) *prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a Conservation Area where this harms the character or appearance of the Conservation Area, unless exceptional circumstances are shown that outweigh the case for retention;*
- (d) *not permit development outside of a Conservation Area that causes harm to the character and appearance of that Conservation Area; and*
- (e) *preserve trees and garden spaces which contribute to the character of a Conservation Area and which provide a setting for Camden's architectural heritage."*

6.27 It also states that in relation to Listed Buildings the Council will:

"Prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;

Only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and

Not permit development that it considers would cause harm to the setting of a listed building."

Policy DP26 (Managing the impact of development on occupiers and neighbours)

6.28 Policy DP26 considers the impact of development with regards to occupiers and neighbours and will ensure that development is not detrimental to amenity and the following factors will be considered:

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

6.29 In particular, paragraph 26.4 gives special attention to light pollution created by excessive artificial lighting levels created by large glazed areas.

Conservation Area Statement – Primrose Hill

6.30 The Conservation area only covers The Rotunda Building (42-43 Gloucester Crescent). The statement refers to this building specifically and states:

“On the corner of Gloucester Crescent and Oval Road is the former piano factory, which dates from 1852. The property is particularly distinctive due to its corner location, its size, at four storeys high with basements, and its circular form. The building is simply detailed and has regularly sized arched windows, which are separated by brick pilasters that run the full height of the building. A decorative stucco cornice tops these pilasters, and overall the visual effect is similar to that of a Victorian gasholder.”

Listed Buildings

- 6.31 Policy PH3 states: *“Under Section 7 of the Planning (Listed Buildings & Conservation Areas) Act 1990, listed building consent is required for demolition of a listed building, and for any works of alteration or extension which would affect its character as a building of special architectural or historic interest.”*

Camden Planning Guidance

CPG1- Design

- 6.32 CPG1 sets out key messages for design excellence, response to heritage issues, extensions, roofs, terraces and balconies.

Appendix 2: Acoustic enclosure example



Turley

Turley