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Planning & Heritage Statement

207 High Holborn, London WC1V 7BW

On behalf of Mr. Paul Bentall

October 2015 - V1

	Contents	Page
1.	Introduction	3
2.	Site Description	4
3.	Planning History	5
4.	Planning Policy	6
5.	Planning Appraisal & Assessment	15
	(a) Introduction	
	(b) Land Use Considerations	
	(c) Heritage & Design Considerations	
	(d) Amenity	
	(e) Sustainable Development	
6.	Summary & Conclusions	20

1. Introduction

This Statement has been prepared by **Washbourne Field Planning** on behalf of Mr. Paul Bentall, to accompany part retrospective full planning and listed building consent applications made to Camden Council for scheme proposals that require planning permission and listed building consent at No. 207 High Holborn, London WC1V 7BW.

The submitted applications seek part retrospective permission for a dormer roof extension and access to a roof terrace serving this restored townhouse, alongside associated internal and external alterations at fourth floor and roof level only, and effectively as a variation to 2008 planning permission and listed building consent approvals (namely 2008/1308/P & 2008/1704/L, respectively).

The submission also seeks to respond to on-going discussions with the Council's enforcement team relating to the installation of a roof terrace, with associated decking, balustrade and staircase at roof level. The works are unlawful however they were carried out to create a usable and functional roof terrace for this family dwellinghouse, opposed to the previously approved 'slither' decking area under permission 2008/1308/P & 2008/1704/L. Therefore, the application submission seeks to regularise the works undertaken, whilst also improving upon them to ensure they are acceptable and appropriate given the building's listed status and location within the Bloomsbury Conservation Area.

The purpose of the statement is:

- To understand the site and its context;
- To explain the principles of the proposal, and of the reasoning, design process and concepts behind them;
- To take into account the significance of the statutorily listed building;
- To show the way in which the proposals have responded to an understanding of the site and its history & context;
- To demonstrate that an inclusive and integrated approach has been adopted in the formulation of the development that responds to the relevant planning policy framework.

The submitted proposals have been informed by expert heritage and conservation advice from Richard MacCullagh MRTPI IHBC from **RMA Heritage**. Richard has 20 years professional experience of advising on historic environment and design issues. Before establishing RMA Heritage, Richard managed the Conservation and Design Team at Winchester City Council, 1998-2008. He has also had articles published in the Building Conservation Directory on conservation areas (2009) and extending listed buildings (2013).

2. Site Description

No. 207 High Holborn is a Grade II listed building of five storeys plus basement level. The building is in mixed use with retail to the basement and ground floor, and a single residential dwellinghouse on the upper four floors. The application relates solely to the single residential dwellinghouse; the upper floor and roof level only.

The English Heritage listing for no. 207 is set out below: -

“Terraced house and shop. C19 earlier. Yellow stock brick with stucco cornice and blocking course. Plain stucco 3rd floor sill band. 5 storeys 2 windows with 4-window right return, some blocked. Wooden shopfront with entablature with iron cresting flanked by consoles. Altered shop window, with large panes. House doorway at return with pilasters carrying entablature. Architraved sash windows with original glazing bars, the 2 above the shopfront having consoles carrying projecting cornices. INTERIOR: not inspected.”

The site is located within the Bloomsbury Conservation Area, and within Sub Area 8: New Oxford Street/High Holborn/Southampton Row.

Paragraph 5.132 of the Conservation Area & Management Strategy sets out that in High Holborn there is a greater variety of materials; the earlier buildings are characterised by red brick and stone, together with yellow stock brick and stucco, whereas the 1960s insertion tend to be clad in concrete panels.

Photographs of the works undertaken and as seen on site - including views within the Conservation Area, can be found at Appendix 1.

3. Planning History

This section sets out the relevant planning records for the site.

Planning permission (2005/1693/P) was granted on 15th September 2005 for the change of use from offices at first to third floor levels and residential flat at fourth floor level to a single residential maisonette at first to fourth floor levels.

Listed building consent (2005/1696/L) was also granted on 15th September 2005 for internal alterations at first to fourth floor levels in association with the change of use to a single residential unit.

Planning permission (2008/1308/P) was granted on 2nd September 2008 for alterations including the installation of new shopfront, ground level side entrance door, and sash windows at ground and fourth floor level, and alterations at roof level including the relocation of a dormer window and new decking.

Listed building consent (2008/1704/L) was also granted on 2nd September 2008 for internal and external alterations including the installation of new shopfront, ground level side entrance door, and sash windows at ground and fourth floor level, alterations at roof level including the relocation of a dormer window and new decking, reconfiguration of staircase and internal alterations to the retail unit.

4. Planning Policy

This section of the Statement identifies the planning policies that are relevant to the consideration of this application.

(a) National Planning Policy Framework (DCLG, March 2012)

The National Planning Policy Framework (NPPF) was published on 27th March 2012, and contains the Government's planning policies for England and explains how these are expected to be applied. Section 38 (6) requires that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions.

The Framework is a key output resulting from the Plan for Growth and the Government's proposals to reform the planning system. It sets the planning agenda for supporting and pro-actively driving sustainable economic growth.

The Ministerial Foreword to NPPF states that:

"The purpose of planning is to help sustainable development. Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations. Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world... We must respond to the changes that new technologies offer us. Our lives, and the places in which we live them, can be better, but they will certainly be worse if things stagnate."

Paragraph 6 confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. **Paragraph 7** advises that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles as follows:

- **An economic role** - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
- **A social role** - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **An environmental role** - contributing to protecting our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural

resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Paragraph 9 is also of relevance and states that *“pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):*

- *Replacing poor design with better design;*
- *Improving the conditions in which people live, work, travel and take leisure; and*
- *Widening the choice of high quality homes”.*

The Core Principles of the NPPF are found in **paragraph 17**, which advises that within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. Of these 12 principles, are that planning should amongst other matters, *“proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs... taking account of the needs of the residential and business communities.”*

Also in **paragraph 17**, one of these core principles states that planning should also *“always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.”*

The Framework also states, as a core principle, that planning should *“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.”*

Paragraph 20 states that to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.

Paragraph 56 confirms 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.

Furthermore, **paragraph 57** states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings.

Paragraph 60 adds that planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

Paragraph 61, further adds that although visual appearance and the architecture of individual buildings are important factors in securing high quality and inclusive design, this goes beyond aesthetic considerations. Planning decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

Section 12 of the NPPF provides guidance in relation to conserving and enhancing the historic environment. **Paragraph 128** confirms that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected. The paragraph further explains that the level of detail required need not be exhaustive and that it should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal in question on the significance of the heritage asset in question.

Paragraph 131 states that *"in determining planning applications, local planning authorities should take account of:*

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness".*

Paragraph 132 advises that *"when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification"*

Paragraph 140 further states that local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

Paragraph 187 advises that local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

In determining planning applications, **paragraph 197** concludes that *"in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development."*

(b) National Planning Policy Guidance (DCLG, March 2014)

The application has also carefully considered all of the following National Planning Policy Guidance documents, in particular:

- Conserving and enhancing the historic environment;
- Design; and
- Making an application.

(c) Local Planning Policy

The development plan for the London Borough of Camden is comprised of the Local Development Framework Core Strategy, Development Policies, and the London Plan. The application was also considered against the Bloomsbury Conservation Area Appraisal and Management Strategy.

The London Plan

Regional planning policy for London is contained within the July 2011 London Plan which sets out planning policy for the capital until 2031, integrating social, economic and environmental policy. The underlying objective is to accommodate London's population and economic growth through sustainable development. The key policies and paragraphs have been set out below.

The London Plan objectives (as set out under **Policy 1.1**) are to ensure London is:

1. A city that meets the challenges of the economic and population growth;
2. An internationally competitive and successful city;
3. A City of diverse, strong, secure and accessible neighbourhoods;
4. A City that delights the senses;
5. A City that becomes a world leader in improving the environment; and
6. A City where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

Policy 7.4 states that developments should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Planning decisions for buildings should provide a high quality design response that considers the criteria set out under Policy 7.4.

Policy 7.6 confirms that at a strategic level architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. In relating this to planning decisions, the policy requires that buildings and structures should be of the highest architectural quality, be of a proportion, composition, scale and orientation that enhances,

activates and appropriately defines the public realm, comprises details and materials that complement, not necessarily replicate, the local architectural character.

Policy 7.8 concerns heritage assets and archaeology and advises that development should incorporate measures that identify record, interpret, protect and, where appropriate, present the site's archaeology. For planning decisions, development should identify value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Paragraph 7.31A states *"Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use."*

Camden Core Strategy

Core Strategy Policy CS1 promotes the efficient use of land and buildings in Camden. The policy promotes that development must make full use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.

Core Strategy Policy CS5 seeks to manage the impact of growth and development. The policy seeks to ensure that development meets the range of objectives of the LDF by protecting and enhancing our environment and heritage and the amenity and quality of life of local communities. The policy also states that the Council will protect the amenity of Camden's residents and those working and visiting the borough by making sure that the impact of developments on their occupiers and neighbours is fully considered.

Core Strategy Policy CS14 is concerned with promoting high quality places and conserving Camden's heritage. The policy states that 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 sites inside and outside the borough and protecting important local views.'*

Camden Development Policies

Development Policy DP24 contributes to implementing the Core Strategy's overall strategy in Policy CS14. Policy DP24 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.'*

Paragraph 24.6 seeks to *'encourage outstanding architecture and design, both in contemporary and more traditional style. Innovative design can greatly enhance the built environment and, unless a scheme is within an area of homogenous architectural style that is important to retain, high quality contemporary design will be welcomed.'*

Paragraph 24.7 states that development should consider:

- '• The character and constraints of its site;*
- the prevailing pattern, density and scale of surrounding development;*
- the impact on existing rhythms, symmetries and uniformities in the townscape;*
- the compatibility of materials, their quality, texture, tone and colour;*
- the composition of elevations;*
- the suitability of the proposed design to its intended use;*
- its contribution to public realm, and its impact on views and vistas; and*
- the wider historic environment and buildings, spaces and features of local historic value.'*

Paragraph 24.8, which also supports Policy DP24 in securing good quality design, states that development should be sustainable as possible. This includes social sustainability that can be addressed by new development that *'provides comfortable, safe, healthy and accessible space for its users.'*

Paragraph 24.15 states, *'architectural detailing should be carefully integrated into a building. In new development, detailing should be carefully considered so that it conveys quality of design and creates an attractive and interesting building.'*

Paragraph 24.16 states that proposals should incorporate materials of an appropriately high quality. *'The durability and visual attractiveness of materials will be carefully considered along with their texture, colour and compatibility with existing materials. Alterations and extensions should be carried out in materials that match the original or neighbouring buildings, or, where appropriate, in materials that complement or enhance a building or area.'*

Fundamentally, **paragraph 24.23** relates specifically to the provision of private outdoor amenity space, including roof terraces. *'Private outdoor amenity space can add significantly to resident's quality of life and applicants are therefore encouraged to explore all options for the provision of new private outdoor space. Gardens, balconies and roof terraces are greatly valued and can be especially important for families.'*

Development Policy DP25 aims to conserve Camden's heritage. The relevant part of DP25 sets out how the Council aims to maintain the character of Camden's conservation areas:

- '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.'*

This policy aims to manage the change in conservation areas in a way that retains the distinctive characters of the conservation areas and will therefore expect new development to contribute positively to this. The Council will therefore only grant planning permission for development in Camden's conservation areas that preserves and enhances the special character or appearance of the area. The character of conservation areas derives from the combination of a number of factors, including scale, density, pattern of development, landscape, topography, open space, materials, architectural detailing, and uses.

Development Policy DP26 seeks to protect the quality of life of occupiers and neighbours by only granting planning permission for development that does not cause harm to amenity.

Camden Planning Guidance (Design) SPD

Camden Planning Guidance 1 (Design) (CPG1) was adopted in 2011, and updated in September 2013 and again in July 2015. This guidance seeks to support the policies in the

Council's Core Strategy and Development Policies - and forms a Supplementary Planning Document (SPD).

Section 3 of CPG1 relates to heritage and states that Camden has rich architectural heritage and that there is a responsibility for the Council to preserve, and where possible, enhance these areas and buildings.

Section 4 of CPG1 relates to extensions and alterations, stating that these should take into account the character and design of the property and its surroundings; and windows, doors and materials should complement the existing building.

Section 5 of CPG1 specifically concerns roofs, and states that roof extensions fall into two categories: alterations to the overall roof form; and smaller alterations within the existing roof form, such as balconies and terraces. When a roof extension or alteration is proposed, the main considerations are:

- The scale and visual prominence;
- The effect on the established townscape and architectural style;
- The effect on neighbouring properties.

Paragraph 5.7 states that *"roof alterations are likely to be acceptable where:*

- *There is an established form of roof addition or alteration to a terrace or group of similar buildings and where continuing the pattern of development would help to re-unite a group of buildings and townscape;*
- *Alterations are architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form;*
- *There are a variety of additions or alterations to roofs which create an established pattern and where further development of a similar form would not cause additional harm."*

Paragraph 5.8 states; *"a roof alteration or addition is likely to be unacceptable in the following circumstances where there is likely to be an adverse affect on the skyline, the appearance of the building or the surrounding street scene:*

- *There is an unbroken run of valley roofs;*
- *Complete terraces or groups of buildings have a roof line that is largely unimpaired by alterations or extensions, even when a proposal involves adding to the whole terrace or group as co-ordinated design;*
- *Buildings or terraces which already have an additional storey or mansard;*
- *Buildings already higher than neighbouring properties where an additional storey would add significantly to the bulk or unbalance the architectural composition;*

- *Buildings or terraces which have a roof line that is exposed to important London-wide and local views from public places;*
- *Buildings whose roof construction or form are unsuitable for roof additions such as shallow pitched roofs with eaves;*
- *The building is designed as a complete composition where its architectural style would be undermined by any addition at roof level;*
- *Buildings are part of a group where differing heights add visual interest and where a roof extension would detract from this variety of form;*
- *Where the scale and proportions of the building by overwhelmed by additional extension."*

Paragraph 5.9 advises, *"materials, such as clay tiles, slate, lead or copper, that visually blend with existing materials, are preferred for roof alterations and repairs."*

Paragraph 5.25 states that a terrace provided at roof level should be set back behind the slope of a pitched roof, or behind a parapet on a flat roof.

Bloomsbury Conservation Area Appraisal and Management Strategy

Paragraph 3.1 of the Management Strategy sets out the approach towards maintaining the special interest of the Bloomsbury Conservation Area. One of the key approaches is that applications for development will be determined having regard to the special interest of the Conservation Area.

Paragraph 3.4 confirms that the LDF retains the objectives of preserving or enhancing the special interest of Bloomsbury Conservation Area. The Council will maintain a policy framework that seeks to preserve or enhance the character or appearance of conservation areas in the context of the most up to date government guidance and strategic policy set out in the London Plan.

Paragraph 5.4 concerns alterations and extensions that can have a detrimental impact either cumulatively or individually on the character and appearance of the area - and the policy text sets out examples within the area.

Paragraph 5.14 highlights that the listed buildings in the area form a very important part of the historic quality and character of the conservation area.

Paragraphs 5.28 to 5.34 set out the detailed policy considerations that any development will need to comply with. Development proposals must preserve or enhance the character or appearance of the Bloomsbury Conservation Area.

5. Planning Appraisal & Assessment

(a) Introduction

Section 38(6) of the Planning and Compulsory Purchase Act 2004 refers to the development plan as a whole and states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

The Framework makes it clear that development plans must be prepared with the objective of contributing to the achievement of sustainable development and that they should be consistent with its policies and kept up to date. Wherever a development plan is absent, silent or its policies are out of date, or where there is more than limited conflict with the Framework, the Framework will carry greater weight as a material consideration in the determination of planning applications.

On this basis, this section assesses the key issues to be considered by Camden Council in determining the submitted applications, which are identified below:

- i. Whether the proposals accord with the relevant policies of the development plan;
- ii. The impact on the heritage significance of site from the internal and external alterations associated with the proposed development;
- iii. The impact on neighbouring properties amenity; and
- iv. If the proposals would amount to sustainable development as defined in the Framework.

(b) Land Use Considerations

The scheme proposals relate to the fourth floor and roof level of an existing single-family dwellinghouse. There is no proposed change of use associated with the submitted applications.

However, in land-use terms, the proposed retention of the roof terrace is crucially important to the Applicant, as this provides much-needed and appreciated external amenity space, which is enjoyed by him and his family. The existing terrace is much more useable than the ‘slither’ of terrace approved in 2008 – however, the proposed scheme does reduce the extent of terrace to reduce the views and impact on the conservation area. Nevertheless, the proposed terrace to be retained is of a good size allowing the family to use the terrace in a more functional way than previously approved in 2008.

The Council's local development plan policies acknowledges and highlights the clear policy consideration which supports the submitted applications: *'Private outdoor amenity space can add significantly to resident's quality of life and applicants are therefore encouraged to explore all options for the provision of new private outdoor space. Gardens, balconies and roof terraces are greatly valued and can be especially important for families.'*

(c) Heritage & Design Considerations

Planning policy both at a national and local level clearly aims to preserve heritage assets and a high quality of design is the objective for new development. In determining applications for listed building consent, there is a legal requirement that Council's have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest it possess. In conservation areas, Council's have a specific legal duty to ensure special attention is paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

The application submission has been informed by advice and guidance from Richard MacCullagh IHBC from RMA Heritage.

The scheme architect has carefully reviewed the existing works undertaken and devised a scheme to ensure that the detailed design, materiality, and views of the roof terrace/dormer access are acceptable and appropriate.

Internally, the scheme proposals seek to retain the layout of the fourth floor and the staircase from fourth floor to roof level. These are subtle and sympathetic. In terms of the layout of the fourth floor, the approved scheme in 2008 was for an open-plan layout for a reception room and study. The proposed layout simply reflects the layout of the floors below with a doorway opening from the top of the stairs. It is acknowledged in the officer's delegated report from the application in 2008 that the top two flights of the building are not considered to be original. There has been no loss of any important historic fabric at this level when assessed against the approved scheme in 2008.

The main bulk of the scheme proposals relate to internal and external works associated with access to the roof through a dormer and a roof terrace deck, which sits above the existing roof. In the approved scheme in 2008, the Council noted and confirmed that there is no ceiling on the upper storey, which has the trusses exposed and a modern plasterboard finish below the joists. This application also confirmed that the sarking boards are modern. Therefore, the proposed roof alterations for a new dormer and terrace were considered to be acceptable in terms of design, materials and execution.

As constructed on site, the existing dormer access and roof terrace are much larger than was previously approved in 2008. The roof terrace is fixed above the existing roof with minimal fixings, as approved. However, the terrace includes a section below the parapet as you access the roof, on the Newton Street elevation, and the remainder of the terrace created is

accessed via timber stairs at a slightly higher level. Furthermore, the Applicant erected timber trellises and posts to enclose the terrace, and a cast iron security screen. However, the existing original roof form remains in-tact and unaffected by the proposals.

The proposed scheme, which has been developed to carefully consider the impact of the proposals on heritage assets, seeks to reduce and alter the external appearance of the dormer to better respect the host building. The scheme also seeks to remove the timber trellises and posts, as well as the cast iron security screen. Furthermore, the proposals also seek to reduce the extent of terrace at roof level. All of which will markedly improve the views of this attractive listed building in the conservation area.

The scheme architect has carefully devised a scheme which skilfully and sympathetically addresses the unlawful works undertaken at these upper levels of the listed building, considers the original consents in 2008, whilst also retaining a useable area of external amenity space. Which is crucially important to this family sized dwellinghouse that without this terrace would have no external amenity space.

In terms of proposed works, the scheme seeks to remove the existing dormer roof, cut down the walls of the dormer, and adapt the dormer with a new shape and cladding. The scheme proposes clad the dormer in lead and insert a conservation style rooflight. Paragraph 5.9 CPG5 confirms that lead is a preferred material for roof alterations to blend with existing materials. These proposed works will significantly improve the scale and appearance of this structure; thereby reducing it's impact on the designated heritage assets. The scheme effectively seeks to add architectural detailing into this new and part retrospective development to create a sympathetic and attractive feature.

The proposed reduction in the extent of terrace area, and associated works including the installation of black painted metal balustrading and railings for safety purposes, is considered to be sympathetic and acceptable. The materials, including the lead cladding for the dormer, are high quality and respect the architectural quality of the listed building and conservation area. It is considered that these materials are entirely compatible with those found in the conservation area.

As demonstrated by the existing and proposed visuals submitted with the application, as well as under Appendix 1, the removal of the timber trellises, posts, and cast iron safety screen will be a significant visual improvement both in terms of views and materiality, albeit we acknowledge that these were erected unlawfully.

It is considered that the proposed alterations whilst they will not be visible whatsoever to those at street level, these alterations are architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form. It is therefore considered that the proposal is in accordance with all national planning policies and guidance, and in particular London Plan policies 7.4, 7.6 and 7.8, and local development plan policies CS14, DP24, DP25 and DP26.

The proposal is considered to be fully compliant with the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and national planning guidance, the London Plan and local development plan documents, including relevant supplementary planning documents. The architectural legacy of the Bloomsbury Conservation Area will be conserved by this proposal.

(d) Amenity

Roof terraces are commonplace across the Borough and across London generally, not least because of the understandable desire to gain additional amenity and enjoyment from private outdoor space. The Council's development plan policy text acknowledges and supports this point that private outdoor amenity space can add significantly to resident's quality of life and applicants are therefore encouraged to explore all options for the provision of new private outdoor space. Gardens, balconies and roof terraces are greatly valued and can be especially important for families.

The proposed reduced size terrace is considered to be sufficiently far away from any neighbouring properties to result in any material harm to their amenity. Most of the surrounding buildings are in commercial use. To the north of the site, the terrace is set-back to ensure reduce any street levels, and therefore there is no harm arising in amenity terms to those properties to the north. In relation to the nearest residential properties, the proposed terrace is over 20m from flats on Newton Street at Aria House to the south, and over 40m from flats at no. 8 Newton Street. The neighbouring building to the west of the site at 199-206 High Holborn is in hotel use as the Hoxton Hotel, which is approx. 10m from the proposed terrace access, and approx. 12m from the useable terrace area.

It is also noted that the approved scheme in 2008 included decking to the full length of the property, which would allow these long views to the properties at Aria House further along Newton Street.

It is considered that the proposal has been designed with care and attention to all national planning policies and guidance, and that the terrace, dormer and associated works do not result in harm to neighbouring properties' quality of life or amenity. Therefore, the scheme is considered to be compliant with local development plan policy DP26.

(e) Sustainable Development

Based on the detailed assessment of the proposals undertaken against the relevant policy objectives of the development plan and the Framework, contained in this statement above, the following conclusions can be drawn.

Economic Considerations: The proposed development will positively contribute towards building a strong, responsive and competitive UK economy.

The construction industry makes a vital contribution to the competitiveness and growth of the economy. Whilst it may be limited, the proposals will subtly contribute towards the prosperity of the construction and development industry in Central London.

The proposals will also support London's economic growth by providing high quality housing, with external amenity space to support and attract an efficient labour market.

Substantial weight should therefore be attached to the economic dimension of the development and the range of benefits it will deliver in the sustainability assessment.

Social considerations: The social dimension of the development is measured by its contribution to the protection of amenity and the living conditions of local residents.

The proposal fully recognises the need to protect the quality of life and residential amenities of the local community working and living in proximity to the site. The proposed roof terrace will not result in any adverse impacts on the amenity of adjoining or neighbouring properties. The proposed internal and external works will not result in any noticeable impacts on the amenity of neighbouring properties' amenity.

Whilst it has been clearly assessed that the proposed works will not result in any noticeable impacts on the amenity of neighbouring properties' amenity, the terrace will continue to have a significant impact on the social well-being and quality of life for the owner/occupier and family, as it provides important outdoor amenity space for this dwellinghouse.

Overall, the social dimension of the proposals is positive and beneficial and should therefore carry considerable weight in the sustainability balance.

Environmental Considerations: The site is not affected by any environmental constraints that cannot be mitigated and the proposed development has been designed to minimise its effect upon the natural, built and historic environment.

The development presents no harm to below ground heritage assets. The scheme will improve the external appearance of this listed building in the Bloomsbury Conservation Area. In particular, the scheme design has been carefully devised to reduce the scale and appearance of the unlawfully constructed dormer and terrace, alongside associated external and internal works to ensure the scheme proposals conserve the character of the conservation area.

The development scheme has been sympathetically designed with detailed care attention to the significance of the heritage asset. There is no loss of any important historic fabric. The proposed works and materials are sympathetic and minor, and considered to be acceptable.

Substantial weight should be attached to the environmental dimension of the development and the significant and much needed investment in this important heritage asset in the sustainability assessment.

11. Summary & Conclusions

This Statement has been produced in support of proposals for full planning and listed building consent applications for part retrospective consent for a roof terrace and dormer access, comprising of internal and external alterations at fourth floor and roof level only, as a variation to planning and listed building consents (2008/1308/P & 2008/1704/L).

No. 207 High Holborn certainly contributes positively to the conservation area, and the house itself has been refurbished and maintained to an excellent standard (as evidenced from the front of the building). The proposal will not have an adverse impact on the conservation area or harm the original roof form, and the only amendment to the historic fabric of the building is the installation of the staircase to allow access, similar to that approved in 2008. Therefore, it is considered that the scheme does not result in substantial harm to the grade II listed building. The choice of materials are considered appropriate in the conservation area, where within the immediate locality the roofscape is defined by varied features and less attractive alterations and additions.

The dormer and terrace have been designed to be more discreet and traditional, and have been reduced in scale and appearance. As a result of these change, and given the distances between properties, it is considered that the proposal will not result in any harm to the amenity of neighbouring buildings. The roof terrace will, however, provide important external amenity space for the single dwellinghouse at no. 207, and is considered vital for the Applicant's family's quality of life.

The proposed development fully accords with the key considerations confirmed in the National Planning Policy Framework and Local Development Plan. It is compliant with the relevant policy context as confirmed below:

- ✓ The proposed scheme design has been approached with care and consideration to the character, appearance and views within the Bloomsbury Conservation Area.
- ✓ The scheme will conserve and enhance the Bloomsbury Conservation Area.
- ✓ The scheme carefully seeks to respond to the site's history and significance.
- ✓ The proposed scheme has been designed with care and attention to the internal and external building fabric to retain, restore, and repair as much historic fabric and features of architectural or historic interest, as possible.
- ✓ The internal and external works are considered to be sympathetic to the listed building and have not been assessed to be contentious.
- ✓ The proposed scheme has been designed to carefully consider scale and visual prominence.
- ✓ The amenity of adjoining properties would not be affected adversely in any way.
- ✓ The proposal provides important useable external amenity space for the single-family dwellinghouse in Central London.
- ✓ It has been demonstrated that the proposals will amount to sustainable development in accordance with the Framework and in all other regards they

would not give rise to any adverse impacts, which significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole.

- ✓ The scheme proposals constitute sustainable development and should be approved in accordance with the NPPF.

Taking into account this assessment and all relevant planning and conservation related matters; we consider that there are sound planning and heritage reasons to support this scheme. We trust that this development proposals will be supported by your Officers.

Appendix 1 - Photographs of 207 High Holborn & Views within the Conservation Area



View of application site at No. 207 High Holborn from corner of High Holborn and Newton Street



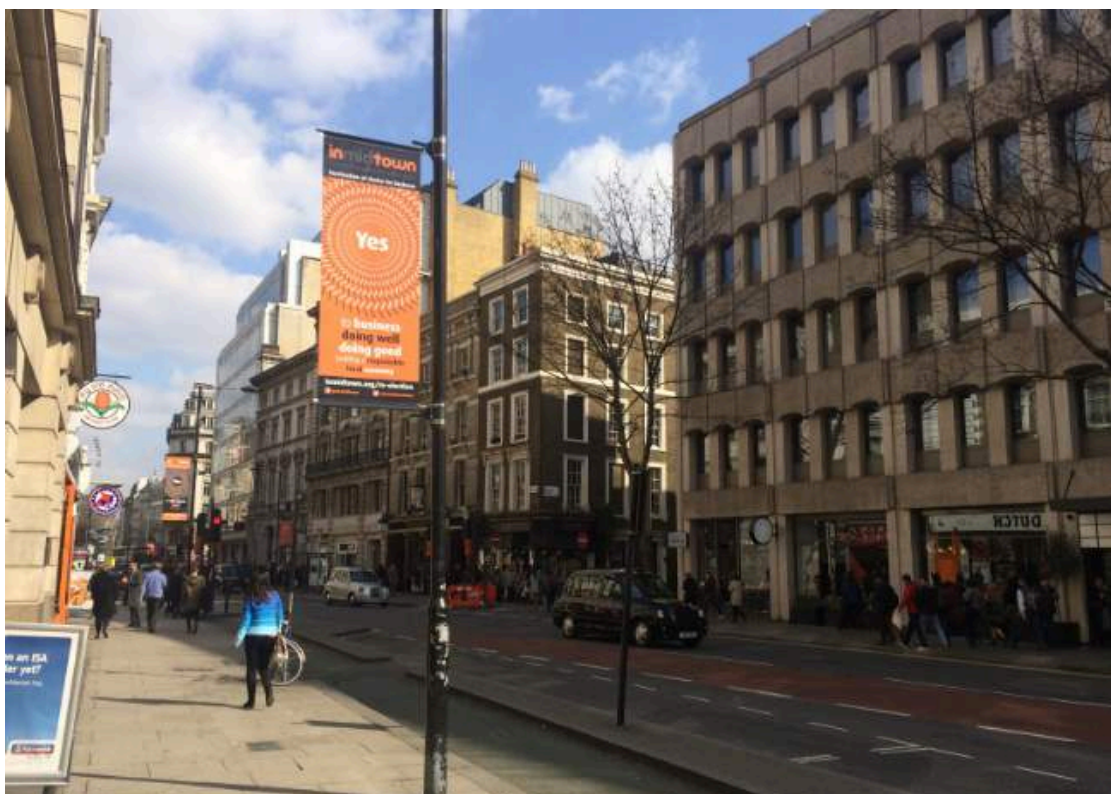
View looking South of the site at No. 207 High Holborn and Newton Street



View looking South East of the site at No. 207 High Holborn and the wider terraces along High Holborn and Newton Street



Medium distance view looking South East from High Holborn of the site at No. 207 High Holborn



Long distance view looking South East from High Holborn of the site at No. 207 High Holborn



Long distance view looking South East from High Holborn of the site at No. 207 High Holborn



View of the site from Newton Street



Medium distance view looking North from Newton Street of the site at No. 207 High Holborn



Long distance view looking North from Newton Street of the site at No. 207 High Holborn



Photograph showing roof terrace with decking and balustrading (taken from middle of roof terrace looking South West)



Photograph showing roof terrace with decking and balustrading (taken from middle of roof terrace looking South East)



Photograph showing dormer entrance to roof terrace with decking (taken from middle of roof terrace looking North West)



Photograph showing dormer entrance to roof terrace with decking (taken from top of stairs to the roof terrace looking West)



Photograph showing staircase and balustrading (taken from top of stairs to the roof terrace looking West)



Photograph showing staircase to roof terrace with decking and balustrading (taken from bottom of stairs to the roof terrace looking East)



Photograph showing balustrading and existing roof (taken from bottom of stairs to the roof terrace looking North)



Photograph showing roof terrace with decking and balustrading (taken from top of the staircase looking South East)



Photograph showing roof terrace with decking and balustrading (taken from the middle of the terrace looking North East)



Photograph showing balustrading and setback from parapet on Newton Street (taken from entrance to roof terrace looking South)



Photograph showing balustrading and setback from parapet on Newton Street (taken from entrance to roof terrace looking South)