



**15 ADELIN PLACE**  
LONDON WC1B 3AJ

**PROPOSAL:** WORKS TO FRONT ELEVATION TO INCLUDE REPLACEMENT OF WINDOWS, ENCLOSURE OF BASEMENT LIGHTWELL IN ASSOCIATION WITH REMOVAL OF REAR FIRE ESCAPE STAIRS, COMMUNAL ROOF TERRACE AND INSTALLATION OF 6 CONDENSER UNITS

Application for planning permission: 2016/1964/P

20 May 2016

The Bloomsbury Association objects to this application and wishes to make the following comments.

- We are of the view that insufficient information has been submitted in order for the application to be properly determined. We have referred to the Council's Local Area Requirements for Planning Applications and believe that the following information should be requested from the applicant in order that it can be properly considered:

  - Daylight and sunlight assessment to address the effective extension of the southern parapet wall of the adjacent residential lightwell;
  - Ventilation assessment on the adjacent residential lightwell;
  - Noise and vibration impact assessment that properly considers the impact of air-conditioning equipment on the adjacent residential uses;
  - Sufficient design justification in the D&AS for rooftop use and its enclosure, means of escape and recladding of the street facade in a conservation area;
  - Details of the proposed opaque screen, glazed roof canopy and plant enclosure, including noise attenuation;
  - Proposals for any external window cleaning equipment for the glazed roof canopy;
  - Details of the provision for refuse storage and collection;
  - Construction management plan.

If decided by the Council without this, the decision may be at risk of being overturned on judicial review.
- We interpret the proposal to include recladding of the street elevation, not what is described in the application as 'window replacement' and 'shop front replacement'. We concur with the response of the Bloomsbury Conservation Area Advisory Committee to this proposal: "*The proposed grey curtain wall frame and powder coated metal surround are totally inappropriate to the amenity of the conservation area.*" The existing cream coloured front elevation and its fenestration may date from 1927 but blend well with the adjoining buildings in terms of colour and design. The vertical expression given to the building by storey height glazing rather than glazed bands with spandrel panels between is, together with the proposed '*engaging focal point at street level*', an inappropriate addition to the streetscene. They detract from the setting of nearby listed buildings at 9-14 Great Russell Street (grade II) and in Bedford Square (all grade I) and is contrary to policy DP24, which aims to secure the highest standard of design. Any proposal must 'preserve and enhance' the character and appearance of the Conservation Area to meet the requirements of DP25, which this manifestly does not.
- The proposal also includes for enclosure of the front lightwell behind the existing railings. Contrary to what the Design & Access Statement assumes, this is a feature of the original

building that adds to the street scene. Its removal does not, in our opinion, 'preserve and enhance' the character and appearance of the Conservation Area.

4. The application is unclear as to the extent of the intended development proposal. The application form describes the proposal as including removal of the rear fire escape staircase. The proposed plan drawings originally submitted with the application (832-DG-XX01 to XX03) were annotated 'existing metal stair to be removed'. Current drawings (832-DG-XX01A to XX03A) omit this note and infer that the rear escape stair is to be retained but within a new or modified inner glazed façade and a solid enclosure with no doors leading into it, except from the basement. No rear elevation is provided to explain what changes to the rear elevation are proposed in order to assess their impact on the Conservation Area and on the setting of adjoining grade II listed buildings at 106 and 107 Greta Russell Street.

This is vague and imprecise and would not be capable of being determined, realised or enforced.

We would like to see a fire strategy that demonstrates that this escape staircase can be removed in its entirety while satisfying Part B of the Building Regulations. We recognise that building control is not a material planning consideration, but a design proposal that can be implemented is.

5. Significantly, the proposal includes for enclosing an area at roof level for ancillary office use. Our concerns about this are two-fold: firstly that social use of the roof could impact on the amenity, privacy and security of adjacent residential uses and, secondly, that this enclosure could be a precursor to a later proposal to fully enclose the space and create more office accommodation. Proposals for an additional floor have previously been refused (PSX0004730 and PS9905214). The policy reasons for these refusals are equally applicable now and are enshrined in DP26.
6. The proposal includes for erecting a timber 'privacy screen' of unspecified height and planters of unspecified species and height that will effectively raise the parapet of the wall on the south side of the adjoining residential lightwell of Bedford Court Mansions. Crucially, while there may also be issues to do with rights of light, no sunlight and daylight assessment accompanies the application.

Guidance on Camden's planning web site states: "*A daylight and sunlight assessment should accompany planning applications where the proposed development has the potential to negatively impact the existing levels of daylight or sunlight on neighbouring properties.*"

One of the core planning principles set by the NPPF is to seek to secure a good standard of amenity for all existing and future occupants of land and buildings. This is reflected in Camden policies CS5 and DP26. With respect to visual privacy, overlooking, overshadowing, outlook, sunlight and daylight, DP26.3 states: "*We will expect that these elements are considered at the design stage of a scheme to prevent potential negative impacts of the development on occupiers and neighbours*". There being no information provided by the applicant to demonstrate this, we are of the view that the proposed development does have the potential to negatively impact on privacy, quietude and on existing levels of daylight and sunlight to neighbouring properties and therefore fails to meet the requirement of CS5 and DP26.

7. The proposed drawings show modifications to an existing fire escape staircase that links the roof of 15 Adeline Place to the adjoining Bedford Court Mansions. The drawings indicate the removal of a half landing and the replacement of a two-flight staircase with a single flight staircase. Again, while not a material planning consideration, we would like to understand how this design intent can be achieved while satisfying Parts B and K of the Building Regulations. Building control is not a material planning consideration, but a design proposal that can be implemented is.
8. The proposal also includes for an unspecified air-conditioning plant enclosure at sixth floor level that is not adequately shown on the drawings. In its identification of the nearest noise sensitive receptor, the accompanying noise impact assessment appears to ignore adjoining residential windows and therefore its conclusions cannot be relied upon. No details are provided of the plant enclosure or of how sound and vibration attenuation will be achieved to protect the amenity of adjacent residential uses to meet the requirements of DP26 nor is noise generated by activity on the roof considered.

9. The proposed enclosure of the roof extension is not sufficiently detailed nor is the stair enclosure at sixth floor level in order to assess their impact on the Conservation Area.
10. There is lack of any provision for the storage, recycling and disposal of waste, contrary to policy DP26, which would encourage waste being dumped on the street each night.
11. There appears to be lack of provision for cycle storage.

The Association supports good quality design that will enhance Bloomsbury's streetscape, which this does not. With such a demonstrable breach of the Council's planning policy and of its supplementary planning guidance, we look to the Council to reject to refuse this application.

We would be grateful if you would let us know of any further modification to the application; the decision, if it is to be decided under delegated powers, or the meeting date if it is to be decided by Committee.

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**On behalf of the Bloomsbury Association**  
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*Copies to:*

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Samir Benmbarek, London Borough of Camden  
Bloomsbury Conservation Area Advisory Committee  
Chair and residents, Bedford Court Mansions  
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