

Client: Damon Heath Date: 12.01.17 CH(RP)A01





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1. DESIGN TEAM

2. INTRODUCTION

The design proposals contained in this design and access statement have been developed in conjunction with the following consultants:

Architect	Studio Stassano
Planning Consultant	Planning Potential
Rights of Light & Daylight & Sunlight	Right of Light Consulting
Structural Engineer	Anderson Consulting Engineers

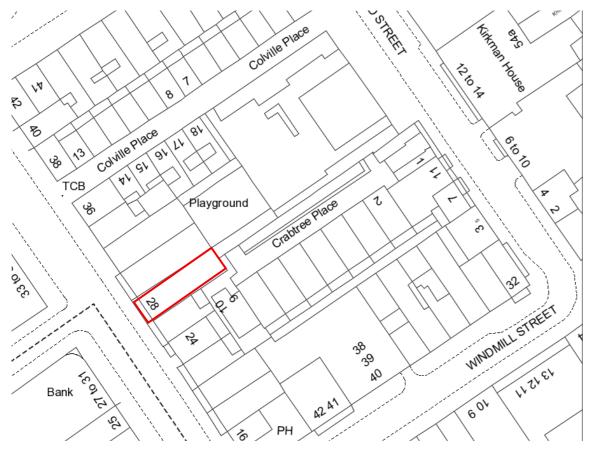


Image 1: Site Plan

This Design and Access Statement has been prepared in support of a planning application for design proposals relating to the refurbishment and alteration of a mixed-use Georgian terrace at 28 Charlotte Street. The proposals seek permission to subdivide an existing single-family dwelling into 3 apartments with alterations to the existing rear extension, part excavation of a basement, erection of a 2nd floor rear extension, and alterations to the fenestration on the existing roof extension.

The submission has been prepared following a preplanning application lodged in August 2015 with a further application for follow-up advice lodged in December 2015 with reference 2015/4972/PRE. Subsequent supporting feedback has been received from the Planning Department of the London Borough of Camden during the planning consultation period. This feedback responds to the concerns raised by the local residents and community groups.

Listed below are design improvements made during the preplanning consultation, which form the basis of the design proposals presented in this report:

- Improved design of the proposed second floor rear extension to provide a positive relationship with the host building and other adjacent buildings specific design improvements include:
 - o Reduced massing by setting back the proposed glazing and reducing the depth of the second floor plan
 - o Use of materials to be in keeping with the original building and the conservation area – change of materials to brick for the angled flank walls and dark metal for the roof and fenestration surrounds
 - o Reduction of exposed glazing Full width glazing reduced by inserting vertical columns/spacers
 - o Stronger link to the design of the lower levels rhythm of fenestration at 2nd floor to be in line with the proposed colonnade screen at Ground and 1st floor
- Improvement to the rear of the historic building at roof level by removing unsympathetic fenestration and reinstating a traditional design with a slate hipped roof and lead covered dormer windows
- Reduced impact to the historic principal rear elevation by removing the proposed external lift

The design proposals have also been improved with comments received during the preplanning consultations with the Bloomsbury Conservation Area Advisory Committee and the Charlotte Street Association (See Section 4 of this report).

From the comments received the following revision was implemented to the design proposals:

 Removal of stone from the rear elevation colonnade and replaced with reclaimed Yellow London Stock brick to be in keeping with the surrounding context

Following the submission of a full planning application lodged in April 2016 with reference 2016/1345/P comments have been received from the Planning Department of the London Borough of Camden.

Listed below are the latest design improvements made during this period:

- Improved design to the proposed rear elevation facing Crabtree Fields and 15-17 Whitfield Street through the following points;
 - o Vertical openings reduced in width and height to provide a greater solidity to the reading of the masonry rear wall
 - o Improved use of materials and screening by replacing the glass and metal railings at the bottom of the vertical openings with staggered open brick courses, slightly set back from the face of the main facade
- Reduced number of residential units from 4 to 3 to provide a higher standard of accommodation. The duplex 2-bed apartment at basement and ground is amalgamated with the first floor 1-bed apartment to provide a larger 3-bed family dwelling over three floors with dual aspect
- Improved measured survey of the existing rear elevation showing the precise heights against the neighbouring properties at Nos. 9-10 Whitfield Street. (See appendix B)

The proposed alterations have been carefully considered with an understanding of the surrounding context and provide a positive contribution to the building and the historic and architectural character of the Charlotte Street Conservation Area.

The proposals carefully balance a conservation-led approach with the brief requirement to adapt the house to provide an increased number of dwelling units, whilst respecting the amenities of its surrounding neighbours.

The design proposals have been developed with full consideration to the following key policy documents:

- Town and Country Planning Act 1990 ٠
- Planning (Listed Buildings and Conservation Areas) Act 1990 ٠
- National Planning Policy Framework (2012) ٠
- National Planning Practice Guidance (2014) ٠
- Technical housing standards nationally described space standards ٠ (March 2015)
- Camden Planning Guidance CPG 1 (July 2015) ٠
- Camden Planning Guidance CPG 2 (July 2015) •
- Camden Planning Guidance CPG 4 (July 2015)
- Charlotte Conservation Area Appraisal and Management Plan (July 2018) ٠
- The London Plan (2015) •
- Camden Local Development Framework Core Strategy 2010 ٠
- Camden Local Development Framework Development Policies 2010 ٠

The design proposals presented in this report are the result of a series of design options developed to assist the client, design team and the planning department of the London Borough of Camden, to select the most appropriate solution for the existing site. These initial design development options are attached in Appendix A.

This statement should be read in conjunction with the application drawings, and other reports accompanying this application.



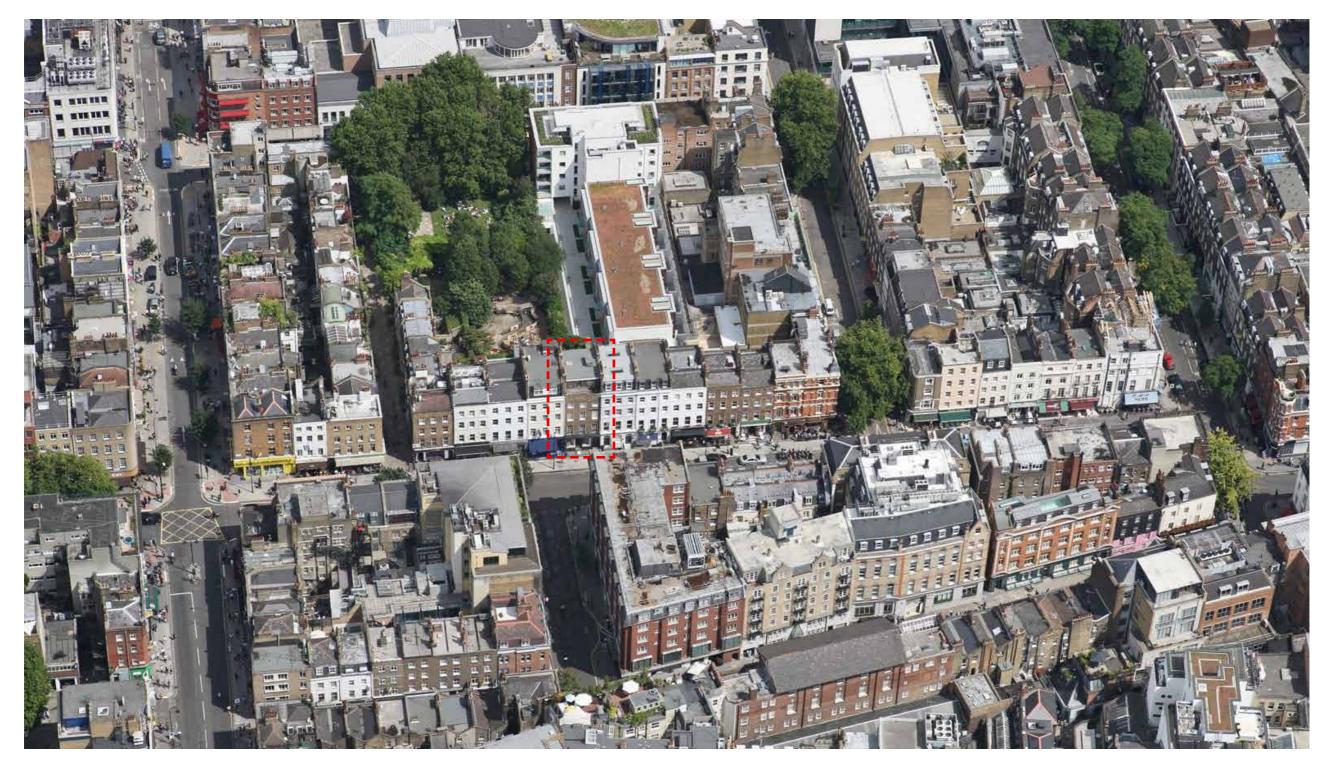


Image 2: Aerial view of 28 Charlotte Street



Planning

3. SITE AND CONTEXT

The site is located within Charlotte Street Conservation Area, in the Central London Area. The property is accessed from Charlotte Street and is bound to the north and the south by two other Georgian terraces. To the east, at the rear of the site, it borders with both Crabtree Fields and a recent 20th century residential development at 7-15 Whitfield Street.

3.1 THE BUILDING

The building is a 5-storey townhouse including a roof extension and basement. It is assumed to have been built between 1750-1770 when most of the area was developed. In later centuries it was subject to extensive alterations and extensions impacting the roof, front elevation and lightwells, and the rear of the building.

Parts of the ground and basement levels are currently used as an art gallery with a shopfront facing Charlotte Street. The residential dwelling is accessed via its original entrance and extends from ground to 4th floor.

The rear ground floor of the residential accommodation benefits from a double height celling and is likely a rear extension to the original house. The space lacks windows and views out and the only daylight it receives is from a set of clerestory windows.

A map dating from 1827 (See image 3) shows the rear of 28 Charlotte Street and many of its neighbouring properties to have originally benefited from an external communal garden. In the 19th century, however, this area is shown to have been mostly infilled by rear extensions (See image 4), and later in the 20th century cleared by WWII bombing and replaced by a car park and consequently in recent years by Crabtree Fields.

The rear elevation at ground and first floor to 28 Charlotte Street forms the boundary wall to its adjacent neighbours, currently in a state of disrepair, uneven and poorly finished (See image 5).





Image 4: Charlotte Street Conservation Area, 1894



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Image 5: Rear wall of 28 Charlotte Street



Image 6: Crabtree Fileds

Image 7: Terraces at Colville Place facing Crabtree Fields









Image 8: 7-15 Whitfield Street Development

Image 9: Rear wall from 7-15 Whitfield Street





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Image10-11: Rear wall from Crabtree Fields
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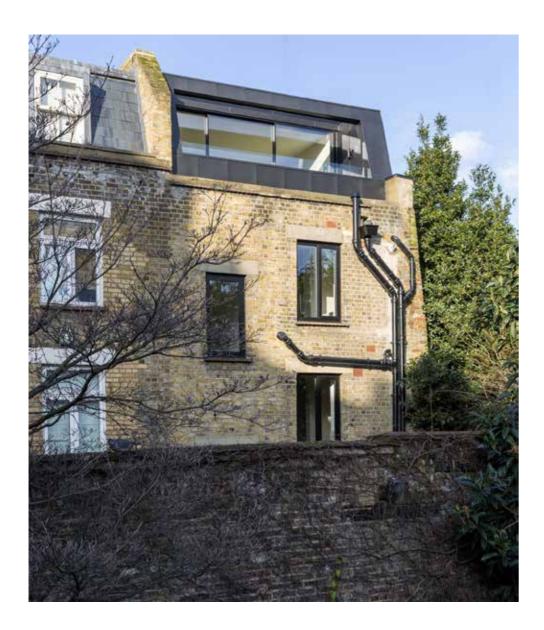


Image 12-13: 18 Colville Place rear elevation and roof extension



4. PRE-APPLICATION ADVICE & CONSULTATION

This section provides a brief overview of the Pre-Application received from the Council, followed by details of subsequent discussions with local resident groups.

Discussions with the Council

Pre-Application advice was sought in September 2015 for the proposed conversion of the existing single dwellinghouse to provide 4 self-contained units, facilitated by the enlargement of the existing basement and proposed second floor extension. The submission included a BRE Sunlight/Daylight report fully assessing the impact of the proposals upon neighbours. Following the submission of the material the design team met with the case officer onsite, and this was followed by written advice provided.

The Officers confirmed in their written response that the principle of the change of use, to rationalise the space to form three new self-contained units was considered to be acceptable. The advice also confirmed that the proposed mix of units was acceptable, as was the quality of the proposed accommodation. The proposed window openings in the double storey rear extension was also considered acceptable, and noted positively as reducing the bulk in views from Crabtree Fields. Concern was however raised regarding the detailed design of the proposed 2nd floor extension, which was at this stage a contemporary, geometric design made of predominantly zinc cladding. Concerns raised focused on both the extent of the extension – of full depth and width, as well as its detailed design.

Following this advice a number of revised proposals were submitted to the Council for comment. As part of these discussions a further site visit was conducted, this time with Design Officers present to provide detailed guidance. Finally a single scheme was identified as being suitable, and in accordance with the Council's relevant guidance. This scheme, forming the basis of the planning application, utilises traditional materials, reflected by both the host building and surroundings. Its size has been greatly reduced in scale, now with a 2.4m set back from the rear elevation.

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Public Consultation

In addition to discussions with the Council, we have also engaged with relevant local groups. The design team, including the scheme architects, met with both the Bloomsbury Conservation Area Advisory Committee and the Charlotte Street Association on the 24th February 2015 to present the proposals – with this scheme provided in Appendix X of this statement. We also informed the ward councillors of the meetings and proposed scheme, should they have any particular interest in the scheme.

At the meetings we received a number of comments, summarised below; Concern regarding the proposed change to the roof creating

- three dormer windows.
- Suggested alterations to the treatment of the rear wall facing • Crabtree Fields, in particular the introduction of a light stone.
- Suggested alterations to the rear wall.
- Expressed concerns about reducing the ceiling height on the first floor, however understood that lateral space was more easily accessible for people with physical disabilities.

Following these comments the design team reviewed the scheme and sought to address these points where possible. As such, the appearance of the rear



elevation was altered, with the removal of the light stone, to reduce the visual impact of the proposals.

Whilst the design team acknowledged comments received from residents stating their desire to retain the existing rear roof extension, the proposed introduction of a more traditionally styled roof has been retained as it is considered to improve the appearance of the building, and follows the advice received from the Council's Conservation Officers.

Update

During consultation on the application, planning officers raised concerns about the quality of accommodation that would be provided to the proposed basement and ground floor flat, specifically in relation to the quality of outlook that this unit would achieve.

To address this concern, the scheme was modified to amalgamate the originally proposed basement and ground floor unit with the proposed 1st floor unit above, creating a new Triplex unit. These changes addressed the officers concerns, reducing the provision of units to 3.

Separately, clarification was sought from officers regarding the potential impact of the proposals upon the outlook from neighbouring properties, particularly those within the relatively recent Whitfield Street development. To address this issue, a new onsite survey was conducted to establish the exact dimensions of the existing building and neighbouring buildings and features. The survey demonstrated that the proposed scheme had actually been drawn to show the existing wall to be lower than it is, which in turn reduced the comparative increase in height proposed by the works.

Revised drawings were submitted addressing this discrepancy, and again these addressed the Council's concerns.

Finally, following further input from the Council's Design Officer, minor alterations were made to the appearance of the rear elevation.

This section firstly identifies the relevant policies of Camden's Local Development Framework applicable to this proposal, before then providing an assessment of the scheme against these.

The Camden Local Development Framework comprises of the following relevant documents;

- Camden Core Strategy 2010
- Camden Development Management Plan 2012
- Camden Supplementary Planning Guidance Note 1 Design

Other material considerations in determining applications include the National Planning Policy Framework (2012), NPPG, National Technical Housing Standards and the London Plan 2015. The Council continues to develop its emerging Local Plan, which is currently out to public consultation in its "Submission" format.

Principle of development

No 28 Charlotte Street is a non-listed building, and local adopted policies designate it within the Charlotte Street Conservation Area, Central London Area, and within the Fitzrovia Action Plan area. The building comprises of ground and basement floor retail use, currently occupied by the Rebbecca Hossack Art Gallery. The rear ground floor, and entirety of all levels above form a 4/5 bedroom dwelling house which backs directly onto Crabtree Fields, a designated Open Space. The property is noted as a positive contributor, and also a shopfront of merit by the Charlotte Street Conservation Area guide. It's quite clear that the value of the building is derived from its attractive and well maintained façade, whereas the rear is of far less value – as is quite typical for buildings of this period construction.

The site has no relevant planning history relating to the proposals. It is worth noting that the site is within immediate proximity to the now completed redevelopment of the former substation/depot at No 7-15 Whitfield Street. Planning permission was granted in 2007 for the redevelopment of the site to provide a part 5, part 3 storey building comprising of B1/D1/D2 uses plus 22 self-contained flats. (ref 2007/5162/p)

The adopted Camden Core Strategy 2010, Development Management Plan 2012, and the emerging draft Camden Local Plan 2015 place a very clear

objective of increasing the provision of housing within the borough, and draft Local Plan policy H1 advises that self-contained housing will be judged as the priority land use.

The existing building comprises of a basement and ground floor retail unit, and the proposals do not seek to change this element of the building, retaining both the use and appearance of the shop unit. The existing residential dwelling comprises of a rear ground floor element, behind the existing retail unit, with access provided up to the existing 4/5 bedroom dwelling house occupying the 1st, 2nd, 3rd and 4th floors. Draft Local Plan Policy H7 Large and Small Homes refers to the need for proposals to provide a mix of units, and where possible the provision should look to provide a mix relative to the Councils "size priority table", the relevant parts of which are set out below;

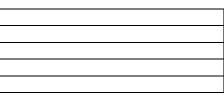
Market Unit size (No of Beds)	Demand
1	Lower
2	Higher
3	Higher
4	Lower

The existing 4/5 bed house is therefore considered to be of lower demand. The proposed mix of units provides 1×1 bed unit – also of lower demand and also introduces 1×2 bed and 1×3 bed units – which are noted as being of higher demand.

It should also be noted that the existing house is not only dated, but inadequate by relative design standards that make it less than ideal for family occupation. Firstly it has very limited amenity space, with a small terrace provided on the existing roof, leading from the bedroom at 4th floor level. This space is not accessed from a primary living space, and its size and location make it far less than ideal as a children's play space. Furthermore, the house is not provided with any designated parking.

The proposed development seeks to extend the building to enable the creation of 3 units, comprising of 1 x 2 bedroom unit, 1 x 3 bedroom and 1 x 2 bedroom unit. All these units not only meet, but in most cases significantly exceed, the





London Plan standards, and all have access to areas of private amenity space. Whilst they will be car free, they are not expected to be occupied by families and so should be well suited to utilise the excellent accessibility to Public Transport officer by the site – Level 6a. A Sunlight/Daylight report accompanies this submission demonstrating that the proposals not only provided future residents with adequate levels of natural light, but also that the scheme will not cause an unacceptable loss of light to neighbours. The scheme thereby provides the Council with an opportunity to move closer in reaching its Housing target by utilising an underused space in a more efficient manner, provider a great quantity and quality of residential space of comparable local demand.

Basement

The proposals include the provision of an extension to the existing basement, which is located toward the front of the property forming part of the existing commercial unit. The proposals seek to extend this basement to rear site boundary, with the created space forming part of the proposed residential accommodation. In order to support this element of the proposals a Construction Management Plan, and Basement Impact Assessment have been prepared and accompany the submission.

Early investigations related to these reports indicate that there was originally a full length basement, meaning the proposals will actually be reinstating an original feature. In any case, the proposals have been fully assessed to ensure that they fully accord with both adopted Policy DP27 and emerging Local Plan policy A5 – Basements. As discussed elsewhere in this document, the proposed basement is for a single storey and falls entirely within the footprint of the existing and original dwelling, and as such meets the size limits set by the policies. The basement will not have any impact upon the appearance or character of the property or wider area, and it does not have any impact upon any trees. The submitted BIA fully addresses the issues of drainage and stability, both in terms of the existing dwelling but also its neighbours.

Detailed design matters

Development Management Policy DP24 "Securing high quality design" states that development will be expected to consider the character, setting, context, form and scale of neighbouring buildings, and the close relationship between the proposals and this adjoining development clearly shows this.

Firstly, the rear elevation of the existing two storey rear element is of poor quality, partly clad in render with noticeable signs of structural issues. As a solid, plain feature it lacks visual interest. The proposed openings into this wall, designed to provide natural light, ventilation and outlook to the proposed units will enhance the visual appearance of this feature. These openings will in addition provide natural surveillance of Crabtree Fields, a public open space – enhancing its security.

Furthermore, the appearance of these works, and the proposed second floor extension are considered to significantly improve the appearance of the building. It terms of height and scale the works reflect that of surrounding 3 storey developments, and the proposed materials, form and details are based upon those of the host and neighbouring buildings.

Finally, existing building was altered at roof level some years ago, understood to be in the 1970's, to provide additional residential accommodation. The form of the works are of their time, and have little resemblance to what we anticipate the roof to have originally looked like – which may have been similar to that at No 26. The proposals seek to replace this arrangement with a far more traditionally styled roof, which we believe to be a significant benefit to the conservation value of the building. This feature will enhance the appearance of the building.

Quality of proposed accommodation

The proposed units are to be of a very high quality, meeting all the various standards as set out by the National Housing Standards, the London Plan 2015 and applicable Camden Planning Guidance Notes. All of the proposed units meet or exceed the relevant size standards, and they are all at least dual, if not tri aspect. A full Sunlight/Daylight assessment has been carried out and confirms that all of the proposed accommodation meets the relevant BRE Guidelines. Paragraph 24.23 of the Camden Development Management Plan acknowledges that whilst the provision of private amenity space is sought, the densely built up nature of borough means that its provision can be a challenge. The scheme has however overcome this challenge, with all units being provided with private amenity space.

Refuse and Cycle Storage provision

The London Plan 2015 requires space to be provided for 1 Cycle per 1 bed unit, and 2 Cycle spaces per larger units. The scheme meets this standard, with the proposed ground floor triplex unit being able to store 2 cycles within the unit, with a further 4 cycle spaces being provided at ground floor level communally.

Refuse storage facilities are to be provided in accordance with the Camden Design Guidance Note 1, with areas being provided internally for all refuse, recycling and food waste. Residents, who will benefit from the Council's daily collections in this area, will then be expected to leave their waste outside of the property on collection days.

Parking

The application site benefits from an excellent PTAL rating, and accordingly the 3 newly created units are to be "Car Free", with their rights to apply for a parking permit restricted by s106 agreement.



IMAGE TO BE ADDED

Image 14: Artist's impression of 28 Charlotte Street rear elevation

The proposals shown in this document reflect an understanding of the existing context, building and planning laws.

The proposals seek to provide high quality, mixed size, residential units of contemporary standards, with improved access and amenities. The provision of these units will provide a more efficient and desirable use of the existing building and respond to the identified housing needs for Camden.

The proposed residential units will be located between basement and 4th floor sharing a communal stair, bicycle store and a main entrance on Charlotte Street. The retail use at front of ground and basement level will remain as existing.

The proposed works will retain the front elevation as existing. Alterations to the rear of the building will be limited to improvements to the existing roof extension by introducing a traditional mansard roof with dormer widows, and the creation of a 2nd floor rear extension.

The interior of the residential building will be stripped-out and modernised with improved finishes and services. The floor structure will be leveled and strengthened and a new stair will be built to connect the main levels of the house with the new accommodation at the rear of the building.

The proposed works at the rear of the building will require altering the rear and side elevation of the existing masonry rear extension, adding a 2nd floor storey and excavating a new basement.

The new extension will be stepped back from the rear façade with angled brick flank walls in order to be subordinate to the existing elevation. The roof and window surrounds will be clad in dark zinc to blend with the surrounding context (See Image 12-13). The proposed massing will be similar to the adjacent development at the former Whitfield substation and the row of terraces at Colville Place, both 3 stories (See image 7,8,12).

The proposed strategy for intervention to the rear of the building aims to be responsive and respectful to the surrounding context. The rear masonry elevation facing Crabtree Fields, currently in a state of disrepair (See image 5), will be improved and altered by forming new openings articulated to respond to its immediate neighbours at Crabtree Fields and 7-15 Whitfield Street.

The new openings will provide the required daylight and aspect to the proposed interiors of 28 Charlotte Street. These will be formed by creating 4 equally spaced vertical openings. (See images 14). This will be done with the aim to retain the existing brickwork as much as possible, and where required parts of the wall will be rebuilt using salvaged brickwork. The new openings will provide an improved facade with visual interest and natural surveillance of Crabtree Fields.

An additional narrow vertical opening will be formed on the southeast façade, facing 7-15 Whitfield Street. This opening will be treated with obscured glass to maintain privacy to the adjacent residential development.

The proposed residential units will be set back from the principal openings facing Crabtree Fields and 7-15 Whitfield Street, creating a 1.5m deep lightwell and a 1.5m deep terrace serving each of the residential units from basement to 2nd floor. The setback will create the required separation from the adjoining neighbours and provide depth to the reading of the façade. The residential units, set behind, will be fully glazed with large sliding windows to maximise the amount of natural light entering the building (see image 15).

The Triplex unit at basement, ground and first floor will have an internal ground floor level matching that of Crabtree Fields and 7-15 Whitfield Street. To provide a balance between views out, natural light and privacy, the proposal requires treating the openings at ground level with a staggered open course brick construction to a height of approx. 2m, to match the height of the adjoining party fence wall. This treatment to the brickwork will be setback from the main building line emphasizing the vertical reading of the facade. (See image 23)

The new extension will abut the existing building with discrete obscured glass to maximise the amount of natural daylight entering the center of the apartments and strengthen the reading of the original building against the later addition.





No. Flats: 4

GIA*:

- Flat 1: 3-bed	156.5 sqm
- Flat 2: 1-bed	84 sqm
- Flat 3: 2-bed	102 sqm

*Pink shading shows area of alterations/redevelopment

- Existing floor levels to main house altered on 2nd and 3rd floor
- Roof profile adapted to reinstate traditional hipped roof and lead clad dormers
- Full width new basement
- All units with external amenity space (balconies)
- External rear masonry party wall with new openings/ glazing
- Main entrance stepped (not wheelchair accessible)

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6.1 ACCESS CONSIDERATIONS AND USE

The internal arrangements provides a total of 3 apartments. All residential units have been designed to comply with the London Plan, current Building Regulations Part M4(1) and M4(2) and space standards set in the Technical housing standards - nationally described space standards.

The following are the proposed dwellings types and sizes:

- 1. Flat 1 Basement, ground floor and first floor triplex unit GIA 156.5 sqm 3 bedroom 5 person unit with 3 sqm storage space
- 2. Flat 2 Second floor unit GIA 84 sqm 1 bedroom 2 person unit with 1.5 sqm storage space
- 3. Flat 3 Third and Fourth floor duplex unit GIA 102 sqm 2 bedroom 4 person unit with 2 sqm storage space

The only minor exception is compliance to the London Plan, by lacking the provision for a disabled WC and a through floor lift to the main entrance floor of Flat 3, the duplex apartment on the top floor. Full compliance to this requirement has not been possible due to constraints in working with the existing building and the desire to place the living accommodation at 4th floor level to benefit from the use of the existing external terrace.

The proposed apartments will satisfy requirements for visitable dwellings as well as accessible and adaptable dwellings, however it should be noted that due to the stepped main entrance, wheelchair access into the property would be restricted. Initial design proposals have attempted to provide a lift serving all floors to provide wheelchair accessible dwellings, however due to restrictions caused by the stepped main entrance and harm caused to the historic rear elevation by the placement of a lift shaft, the provision for a lift was removed.

6.2 BICYCLE STORAGE

The London Plan 2016 requires 1 cycle space to be provide for 1 bedroom units, and 2 spaces to be provided for all larger units. The provided cycle storage is to be secure and easily accessible. The proposals meet this requirement through the provision of 2 separate areas. The Triplex unit, accessed via the ground floor, is allocated 2 private spaces within the unit. The proposed units accessed at 2nd and 3rd floor level are allocated in a communal store of 4 cycles. Providing this storage at ground floor removes the need for residents in either flat 2 or 3 to carry their bicycle up the stairs

6.3 REFUSE STORE

The existing single dwelling lacks an externally accessible refuse store. This is caused by the infilling of the external lightwell and ownership of the basement and part ground floor by the retail unit.

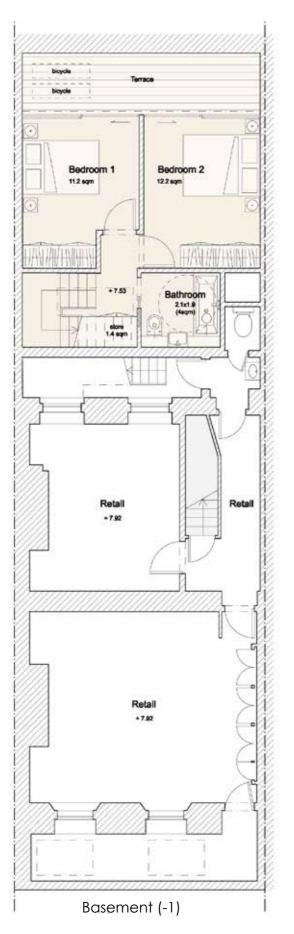
The proposals provide each flat with ample dedicated storage areas within the unit for typical and recyclable waste. As per the existing arrangement, residents will be responsible for placing their waste out on Charlotte Street for disposal of collection days.





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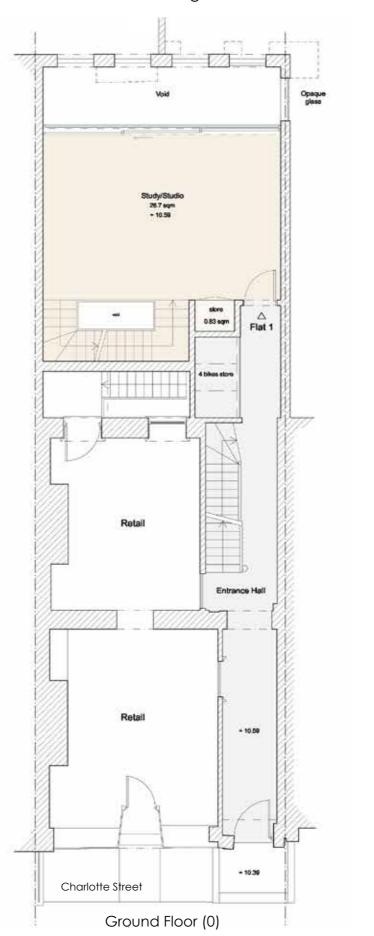
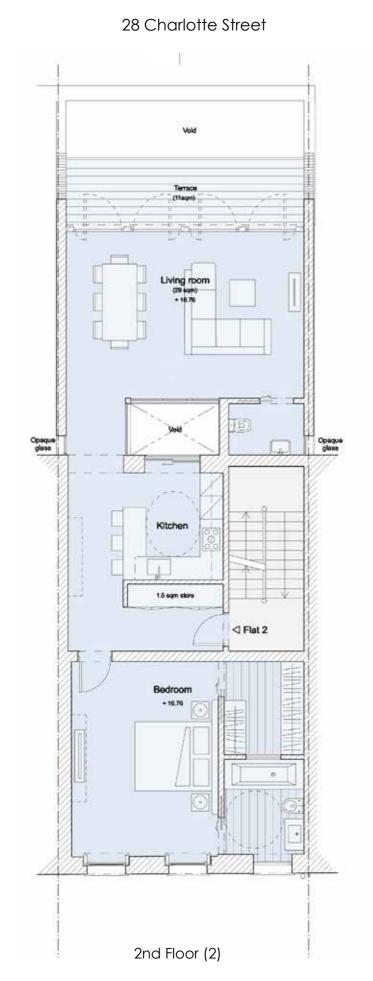
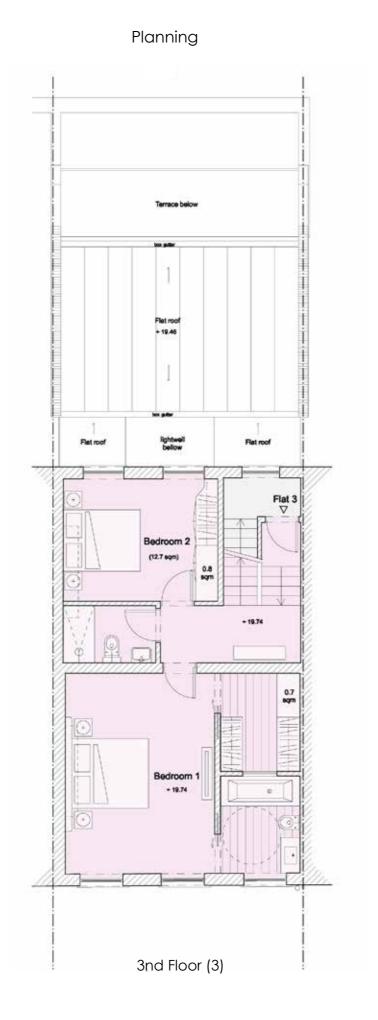


Image 16: Proposed Plans











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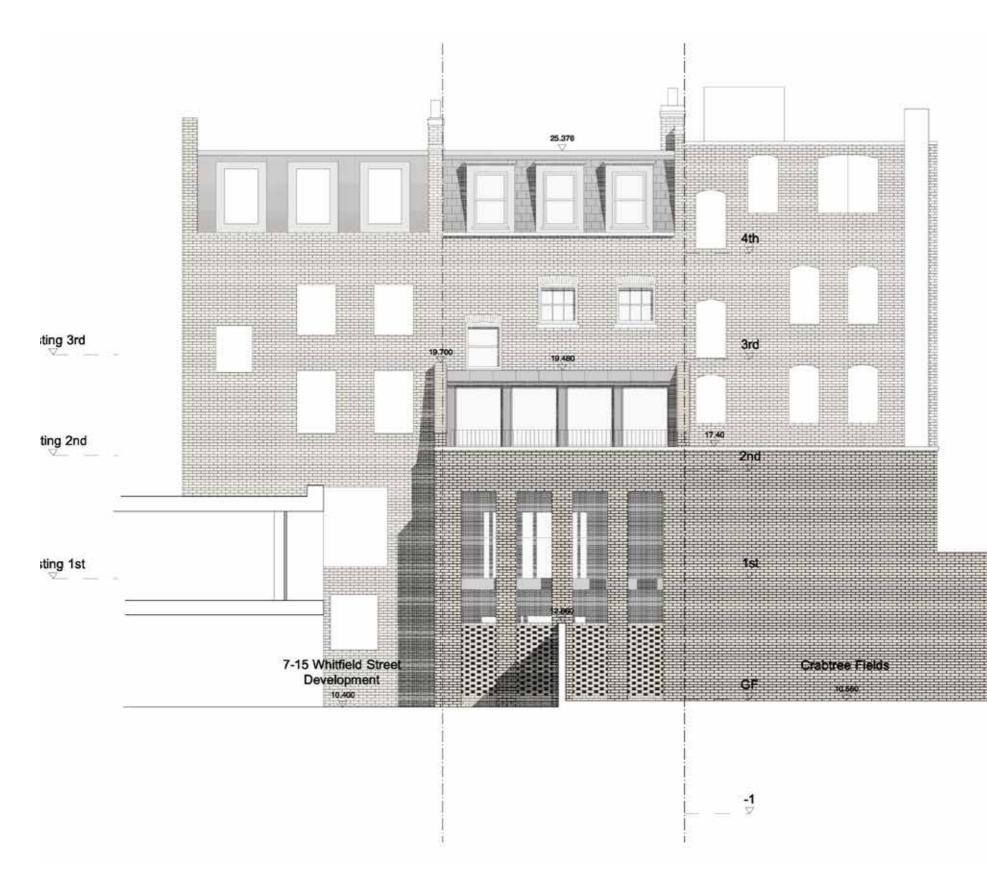


Image 18: Proposed Rear Elevation

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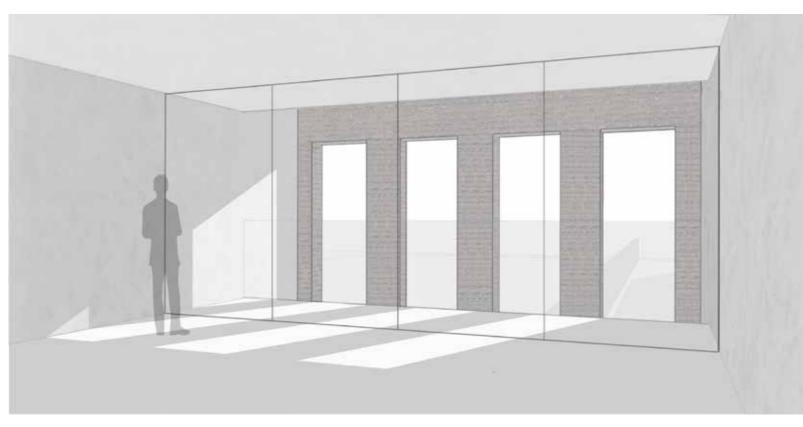


Image 19: First floor internal view

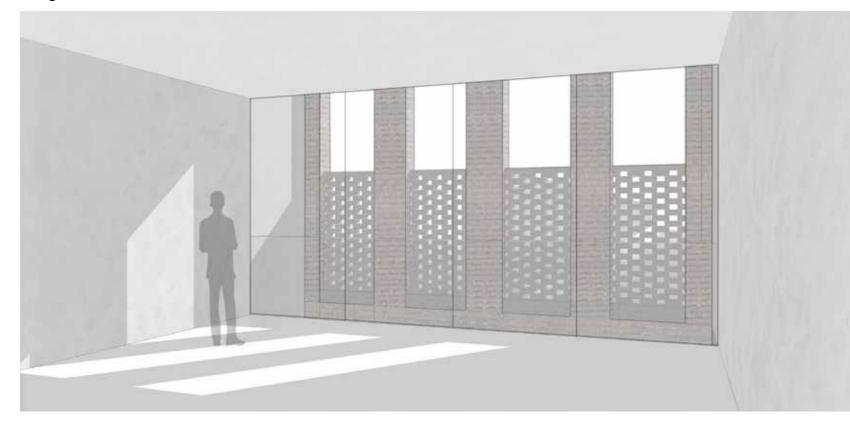


Image 20: Ground floor internal view





7. PRECEDENTS

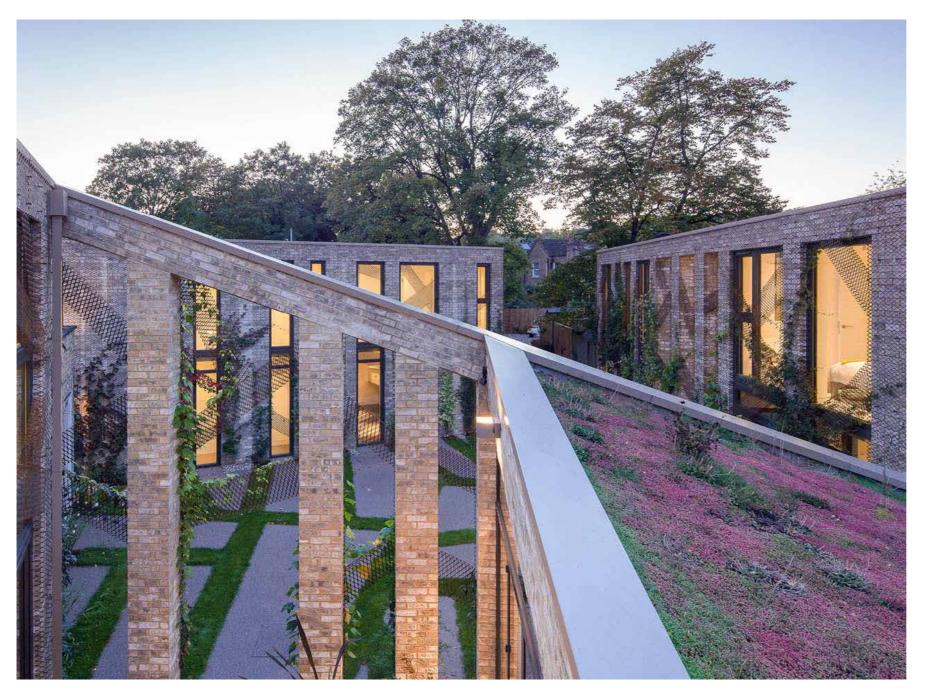






Image 23: Staggered open brick course facade

Image 21: Baca Architects, Forest Hill mews, London



Image 22: DMOA Architects, La Brancha house, Belgium

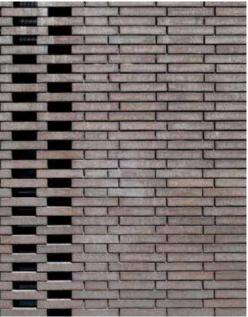




Image 24: Una Architects, The Garoa Stone, Brazil

Image 25: David Chipperfield Architects, Private House Kensington, London







Planning

8. APPENDICES

APPENDIX A DESIGN DEVELOPMENT OPTIONS



Image 27: Artist's impression of rear facade - Option 2 of the Initial designs developed during the preplanning consultation.



Image 26: Artist's impression of rear facade - Option 1 of Initial designs developed during the preplanning consultation.



Image 28: Artist's impression of rear facade - Design developed follow-ing the pre-planning consultations and presented to the local community groups.



Image 29: Artist's impression of rear facade - Design developed following consultations with the Bloomsbury Conservation Area Advisory Committee and the Charlotte Street Association





APPENDIX B

MEASURED SURVEY OF REAR WALL TO CRABTREE FIELDS AND 7-15 WHITFIELD STREET

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