

Address:	64 Lincoln's Inn Fields London WC2A 3JX		4
Application Number:	2013/7434/P	Officer: Gideon Whittingham	
Ward:	Holborn & Covent Garden		
Date Received:	13/11/2013		
Proposal: Change of use from offices (B1a) to residential (C3) and partial demolition, alteration and extension to create 9 residential units.			
Drawing Numbers: L(00)010 Rev A; L(00)100 Rev A; L(00)101 Rev A; L(00)102 Rev A; L(00)102 Rev A; L(00)103 Rev A; L(00)104 Rev A; L(00)105 Rev A; L(00)110 Rev A; L(00)111 Rev A; L(00)113 Rev A; L(00)114 Rev A; L(00)121 Rev A; L(00)130 Rev B; L(00)131 Rev B; L(00)132 Rev B; L(00)133 Rev B; L(00)134 Rev B; L(00)135 Rev B; L(00)140 Rev B; L(00)141 Rev A; L(00)143 Rev A; L(00)144 Rev B; L(00)151 Rev A; L(00)200 Rev F; L(00)201 Rev F; L(00)202 Rev D; L(00)203 Rev D; L(00)204 Rev D; L(00)205 Rev D; L(00)210 Rev D; L(00)213 Rev C; L(00)214 Rev D; L(00)219 Rev D; L(00)221 Rev B; BREEAM Domestic Refurbishment Pre-Assessment Report, Prepared by Price & Myers, dated 08/11/2013; Energy Statement, prepared by Slender Winter Partnership LTD, dated November 2013; Daylight & Sunlight Report, prepared by Waldrams, dated 13th November 2013, Flood Risk Assessment, Prepared by Price & Myers, dated October 2013; Environmental Noise Survey & Plant Noise assessment report 19665/PN1, prepared by Hann Tucker Associates, dated 6th November 2012, affordable housing letter, prepared by Raoul Veevers, dated 21 st August 2014.			
RECOMMENDATION SUMMARY: Grant conditional planning subject to a section 106 Legal Agreement			
Date of Application:	13/11/2013		
Related Application Number:	2013/7457/L		5
Proposal: Internal and external alterations associated with the change of use from offices (B1a) to residential (C3) and partial demolition, alteration and extension to create 9 residential units.			
as shown on drawing numbers above			
RECOMMENDATION SUMMARY: Grant Listed building consent			
Applicant:	Agent:		
Tajar Global Investments Ltd c/o Agent	Montagu evans LLP 5 Bolton Street London W1J 8BA		

ANALYSIS INFORMATION

Land Use Details:

	Use Class	Use Description	Floorspace
Existing	<i>B1a Business - Office</i>		<i>1106m²</i>
Proposed	<i>C3 Dwelling House – 9 flats</i>		<i>1100m²</i>

Residential Use Details:

	Residential Type	No. of Bedrooms per Unit			
		Studio	1	2	3
Existing	<i>Flat/Maisonette</i>	-	-	-	-
Proposed	<i>Flat/Maisonette</i>	3	1	4	1

Parking Details:

	Parking Spaces (General)
Existing	<i>4</i>
Proposed	<i>0</i>

OFFICERS' REPORT

Reason for Referral to Committee: The proposal constitutes the creation of five or more residential flats from either the erection of a building or the conversion, change of use or extension of an existing building [Clause 3 (iii)]; The proposal involves demolition of part of a listed building [Clause 3(v)] and is subject to the completion of a Section 106 legal agreement for matters which the Director of Culture and Environment does not have delegated authority [clause 3(vi)].

1. SITE

- 1.1 The application site is located on the west side of Lincoln's Inn Fields, close to the junction with Remnant Street and Gate Street. The building is four storeys (plus basement), comprising a single occupier for office accommodation (Class B1a), although it was originally built as a single dwelling.
- 1.3 The predominant character of the surrounding area is, like the application site, commercial in nature, and forms part of the Central London Area.
- 1.4 The application building is grade II* listed, located within the Bloomsbury Conservation Area, and is located within an Archaeological Priority Area.

2. THE PROPOSAL

Original

- 2.1 Change of use from offices to residential and partial demolition, alteration and extension to the existing building to create nine residential units. The proposal includes:
- Demolition of existing narrow width 2 storey rear extension located at lower ground floor level for replacement with a 5 storey rear extension of similar width
 - Demolition of existing single storey vaults at rear lower ground floor level for replacement 2 storey extension
 - Extend 4m (width) of rear elevation 3m rearward at first to main roof level
 - Repair to the façade and the removal of the non-original stairs to the lightwell
 - Refurbish and subdivide interior
 - Installation of secondary glazing to all windows
 - Installation of plant to main roof
 - Installation of bin store to front courtyard
 - Replace non-original rear elevation

Revision

- 2.2 The proposal was revised following neighbour consultation and comments from both English Heritage and Camden's Conservation officers, namely:
- Retention of existing 2 storey rear extension located at lower ground floor level
 - Fixed railing gate (preventing vehicular access to front hardstanding)
 - Relocation of cycle storage

3. RELEVANT HISTORY

- 3.1 Ref: 17718 - Replacement of the existing building by the reconstruction of the rear half of the building to comprise basement, ground and five upper floors, and the retention and refurbishment of the front, with the addition of a mansard roof storey. Granted 05/02/1974.
- 3.2 Ref: 19246 - Construction of rear extensions for use as offices. Granted 31/12/1974.
- 3.3 Ref: 24133/R - The rebuilding of part of the rear wall. Granted 14/03/1977.
- 3.4 Ref: HB/1602/R - Removal of part of rear section of the building and works of alteration to the rear and front elevations and works of alteration, repair and reinstatement internally. Granted 02/06/1977.
- 3.5 Ref: HB/865 - Renovation without alteration of the front part of the buildings (including staircase) and demolition of the rear part of the building. Granted 08/09/1976.

4. **CONSULTATIONS**

Statutory Consultees

4.1 **English Heritage** made comment on the proposal:

- *Welcomes the desire to bring this vacant building into use, we would encourage the Council to carefully examine the marketing information supplied to justify the change of use. This is because the subdivision of the building will require further intrusive alterations beyond those carried out in the twentieth century when the office accommodation was upgraded. Given the impact of these works, the Council should consider if residential flats would be the optimal viable use for this building as set out in the National Planning Practice Guidance, which accompanies the National Planning Policy Framework (NPPF).*
- *However, English Heritage does not agree with all the findings in the statement of significance, namely in relation to the rear of the building. While this part of the building has been altered previously, the rear building line that defines the historic envelope of the building is still apparent and in our opinion is a significant feature worthy of retention.*
- *Due to the size of the proposed extension, full-height and covering most of the rear façade; the loss of the Victorian extension which is of some evidential value; and the proposed alteration to the plan form including the creation of a lightwell to illuminate the stairwell, the proposed works would cause harm to the significance of no 64. It would also have a harmful affect on the setting of the neighbouring grade II star listed building at 65 Lincoln's Inn Fields.*
- *We would urge you to address the above issues, and recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.*

4.2 **Greater London Archaeological Advisory Service (GLAAS)** made comment on the proposal:

- *The archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition is therefore recommended to require a two stage process of archaeological investigation.*

Conservation Area Advisory Committee

4.3 **The Kingsway and Bloomsbury CAAC** were notified of this application. To date no response has been received.

Adjoining Occupiers

4.4 A press notice was erected in the Ham & High on the 26/12/2013 allowing comment until the 16/01/2014 & a site notices was erected on the 20/12/2013 allowing comment until the 10/01/2014.

<i>Number of letters sent</i>	22
<i>Total number of responses received</i>	3
<i>Number in support</i>	0
<i>Number of objections</i>	3

4.5 3 letters of objection were received:

Occupants of 65 & 66 Lincoln's Inn Fields:

- *Structural impact to our building*
- *Noise impact to our business*

The Heritage Advisory (on behalf of occupants of 65 & 66 Lincoln's Inn Fields):

- *Invasive alterations as a result of subdivision*
- *Rear extension alters the existing layout and floorplan but also affect not only the special historic interest of the listed building, but also its special architectural interest and the character and appearance of the elevation arising out of this*
- *The lower level dwelling is more 'inventive', given its location and configuration it has to be questioned whether or not this can in real terms be a functioning and useable dwelling, sited and positioned where no residence would ever have been placed historically*
- *The rear of these properties is nevertheless a component part in its own right and would affect 65 and 66 Lincoln's Inn Fields*

WS Planning & Architecture (on behalf of occupants of 65 & 66 Lincoln's Inn Fields):

- *Loss of employment floorspace*
- *The alterations proposed to the rear of the building including the monolithic four storey rear extension and partly glazed modules in the rear courtyard do little to promote or reinforce local distinctiveness.*

- *Give rise to noise and disturbance from future occupiers of the proposed flats and dwelling to the rear*
- *Structural integrity of the party wall*

4.6 All comments above are based upon the original scheme and not the revised scheme.

5. **POLICIES**

5.1 **National and Regional Policy**

National Planning Policy Framework 2012
London Plan 2011

5.2 **LDF Core Strategy and Development Policies**

CS1 Distribution of growth
CS3 Other highly accessible areas
CS5 Managing the impact of growth and development
CS6 Providing quality homes
CS7 Promoting Camden's centres and shops
CS8 Promoting a successful and inclusive Camden economy
CS9 Achieving a successful Central London
CS11 Promoting sustainable and efficient travel
CS13 Tackling climate change through promoting higher environmental standards
CS14 Promoting high quality places and conserving our heritage
CS17 Making Camden a safer place
CS18 Dealing with our waste and encouraging recycling
CS19 Delivering and monitoring the Core Strategy

DP2 Making full use of Camden's capacity for housing
DP5 Homes of different sizes
DP6 Lifetime homes and wheelchair homes
DP13 Employment sites and premises
DP16 The transport implications of development
DP17 Walking, cycling and public transport
DP18 Parking standards and limiting the availability of car parking
DP19 Managing the impact of parking
DP20 Movement of goods and materials
DP21 Development connecting to the highway network
DP22 Promoting sustainable design and construction
DP24 Securing high quality design
DP25 Conserving Camden's heritage
DP26 Managing the impact of development on occupiers and neighbours
DP28 Noise and vibration
DP29 Improving access
DP31 Provision of, and improvements to, open space, sport and recreation
DP32 Air quality and Camden's Clear Zone

5.3 **Supplementary Planning Guidance**

Camden Planning Guidance 2013 (CPG1, 2, 3 & 5) & 2011 (CPG6-8)

Bloomsbury Conservation Area Statement/Bloomsbury Conservation Area Appraisal & Management Strategy (2011)

6. ASSESSMENT

6.1 The principal considerations material to the determination of this application are summarised as follows:

- Land use – loss of the employment floorspace
- Housing
- Design/Townscape
- Amenity
- Energy / Sustainability
- Transport
- Other S106 / Mayoral Community Infrastructure Levy (CIL)

Land use – loss of the employment floorspace

Land use – loss of the employment floorspace

6.2 LDF policies CS8 and DP13 provide a context for the loss of employment, in this instance office floorspace. Policy CS8 seeks to secure a strong economy in the borough by (amongst other things) safeguarding existing office premises in the borough which meet the needs of modern industry and employers. However, more specifically paragraph 8.8 indicates that the Council are promoting newly built office space to meet projected demand, and so there is a general presumption that older office spaces can be released where housing or community uses are proposed.

6.3 DP13 indicates circumstances under which the Council may allow a change to non-business use, namely where premises are not suitable for their existing use and there is evidence that the possibility of re-using or redeveloping the site for alternative business use is not appropriate. These policies are supplemented by CPG5, which provides more detailed guidance, including a further checklist of considerations and details of marketing expectations.

6.4 The more recent National Planning Policy Framework (NPPF) is another consideration, with paragraph 51 of the NPPF stipulating that local planning authorities should “normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate”.

6.5 Although CS8 has a general presumption to resist the loss of employment space, DP13 advises that it may be acceptable change to a non-business use if:

- a) *it can be demonstrated that the building is longer suitable for its existing business use, and*
- b) *there is evidence demonstrating that the building has been marketed for a similar or alternative business use over an appropriate period of time without success.*

DP13 part (a)

6.6 Section 13.3 of policy DP13 lists 9 key requirements that should be considered when assessing whether a business use should continue or not. A change to a non-business use may be justified if the requirements are not met, which are listed and considered separately below.

- *Is the site located or adjacent to the Industry Area, or other locations for large scale industry and warehousing? No*
- *Is in a location suitable for a mix of uses including light industry and local distribution warehousing? No*
- *Is easily accessible to the Transport for London Road Network (TLRN)? No*
- *Has potential to be serviced by rail or water? No, vehicular only*
- *Has adequate on-site vehicle space for servicing? Yes*
- *Is well related to nearby land uses? Offices are the predominant use, however residential uses (noise/vibration/pollution sensitive) are adjacent. Therefore light industrial, industrial or warehousing may not be appropriate, only B1a office would be appropriate.*
- *Is in a reasonable condition to allow the business use to continue? The site could allow business use to continue although the site would require significant upgrade and refurbishment works of both the services and the layout of the building in order to bring it up to modern standards and compete with more modern office floorspace nearby. The building is also listed which restricts the potential for changes to the layout of the building.*
- *Is near to other industry and warehousing, noise/vibration generating uses? No.*
- *Provides a range of unit sizes for small businesses (under 100sqm)? Yes, the site could potentially be subdivided to provide a range of unit sizes. However the heritage constraints of the listed building would prohibit unsympathetic subdivisions.*

6.7 Out of the 9 requirements listed, the current building fails to meet 5. Consequently a strong justification exists for potential redevelopment to a non-business use.

6.8 In support of the policy DP13 requirements, Camden Planning Guidance 5 (CPG5) goes further to categorise employment sites in the borough. Category 1 is the highest quality, most rare and will always be protected. Category 3 is the lowest quality, most common and once empty are generally in of need significant investment to bring back into viable use.

- 6.9 Following an inspection by officers, the building can reasonably be categorised between 2 and 3. The premises comprise poor access (small doors, steps with no level access from any entrance point), there is no cooling, which is often sought by occupants and offered by 'competitor' buildings. The services require upgrading to modern day standards in terms of DDA compliance, energy efficiency and sustainability and, given its designation as a listed building, would require a higher level of investment to be maintained or brought back into a reasonable and competitive condition.
- 6.10 In summary, the requirements of policy DP13 part (a) and guidance under CPG5 demonstrate that substantial works are required for the site to be attractive for modern day occupants a significant refurbishment would be necessary. This subsequently demonstrates that the site is not suitable for any other uses other than B1a offices, as such a permanent change of use to housing is supported by policy DP13.
- DP13 part (b)*
- 6.11 Notwithstanding the justification for a permanent change to housing outlined above, the applicant has also undertaken a marketing exercise to further evidence that a change of use from employment can be supported. Marketing of the site began in February 2013.
- 6.12 CBRE and were instructed to market the site locally and nationally via all major online marketing tools, in accordance with the requirements set out in CPG5.
- 6.13 The interest was primarily driven from the legal sector and a Barristers Chambers. However, given its listed designation, the building does not lend itself to a mix of uses/users, therefore a single occupier was sought (restricting the market, whilst not restricting the target occupier market).
- 6.14 Whilst potential occupiers were identified, the majority of interest from viewings appears to follow the current trend (Highlighted in the submitted Available Office Space Focus Report), with companies either preferring to purchase their premises or requiring space of a higher quality (ancillary facilities, fully accessible toilets/showers, air conditioning), offering more flexibility and in some cases, preferring to be on a single floor. All of which were cited where cited as marketing feedback.
- 6.15 Planning and Economic Development Officers are therefore satisfied a robust assessment and justification against the provisions of DP13 has taken place to support the view that the building is no longer suitable for on-going office use in its current form and physical state of repair, without requiring significant investment for a business use to continue. This is further evidenced by the level of interest but failure to let the property during the marketing campaign. The complete loss of the employment floorspace on this particular site is therefore accepted and is in general compliance with policies CS8 and DP13.
- 6.16 In the context of the invasive work required to a listed building for office use, an exception could be made for the loss of employment floor space in support of residential use in the interests of preserving and restoring the Listed Building, and this

principle is supported by English Heritage. In addition similar proposals at Grade II listed buildings at numbers 1-2, 5 and 6 were granted planning permission in 2013, 2007 and 2010 respectively. The loss of the employment floor space within the Inns of Court Area designation, in this case is therefore considered acceptable.

Loss of employment floorspace - conclusions

- 6.17 It is acknowledged that the site owner could undertake refurbishment works to make the building attractive for business tenants. However in light of the site not meeting many of the DP13 requirements for an attractive business use location or condition, and by virtue of it falling under CPG5 Category 2/3, it would be unreasonable to request that the owner undertakes such a significant investment and risk. To request this could inappropriately result in significant piece of unused and underused land to continue lain vacant, whereas it could otherwise be redeveloped for an alternative use. In this case housing which is the council's top land use priority.

Principle of housing

- 6.18 Housing is the land use priority of the LDF and the provision of new residential floorspace is welcomed as long as it complies with other policies and guidance.

Housing

Affordable Housing

- 6.19 Policy CS6 seeks all developments with a capacity to provide 10 units or more to make a contribution to affordable housing. Additionally, a floorspace over 1,000sqm GEA or more is considered usually capable of accommodating 10 units. In this case the proposed development would provide 9 flats totalling 1100sqm as such the proposal would require 11% of the floorspace (121sqm) contribution towards affordable housing. Policy DP3 outlines a clear approach that affordable housing is expected on-site in the first instance, but where it cannot practically be achieved on-site, off-site affordable housing may be accepted or exceptionally a payment-in-lieu.
- 6.20 With regards to provide an affordable unit onsite the applicant states that as the site is a Grade II listed building and due to the internal layout, provision is not practical. The subdivision of the heritage asset into a higher number of flats would also require a lot of significant interventions to the building, as would provide separate access core for any affordable unit. For these reasons it was considered that 9 units is the optimum number in this building. Officers accept that it would not be practical to secure an affordable unit onsite in this instance.
- 6.21 The applicant does not own any other buildings within the administrative boundary of Camden which could be used to provide 132sqm (the requirement is slightly greater off-site than on-site to account for the additional market housing floorspace secured onsite) of residential accommodation. Nor does the Council have an appropriate and specific scheme in close proximity, to physically secure the 132sqm requirement.
- 6.22 The Council will therefore accept a payment in lieu. Using the calculations set out in CPG8 the payment in lieu of affordable housing would be £320,650 (121sqm

affordable housing requirement x £2,650sqm). In this instance the applicant has confirmed that they will make the £320,650 housing contribution in full, which would be secured by the s106.

Standard of accommodation

- 6.23 The proposal would provide 3 x studio flats, 1 x 1 bedroom flat, 4 x 2 bedroom flats and 1 x 3 bedroom flat for residential (class C3) accommodation.

Floor Level	Unit No.	Bedrooms/Persons	Floorspace (GIA sqm)	CPG	London Plan
G	1	3/6	143	93	95
G+B	2	2/4	117	75	70
G+B	3	1/2	64	48	50
G	4	Studio/1	30	32	37
G	5	Studio/1	30	32	37
G	6	Studio/1	24	32	37
1	7	2/4	142	75	70
2	8	2/4	121	75	70
3	9	2/4	127	75	70

- 6.24 The majority of units capable of accommodating 1 - 6 persons would meet the minimum floorspace requirements according to the CPG standards. It is noted that 3 of the studio units designed are shy of the 37m³ (Greater London Authority Housing SPG) floor area guideline level and 32 m³ (CPG). Given the designation of the building, and the internal constraints to combine said units for larger accommodation, very limited shortfall in floor area is not objectionable. Given the greater number of units with dual aspect outlook, the ability to implement a stacking arrangement of rooms within the scheme and the provision of a lift to all floors, this scheme would therefore provide a high quality of accommodation.
- 6.25 The Council acknowledges that there is a need and/or demand for dwellings of every size, however Camden will focus and prioritise provision around the very high and high priority sizes. Set out in Policy CS6, the Dwelling Size Priorities Table identifies market homes with 1 bedroom of low priority, 3 and 4 bedroom units of medium priority and 2 bedroom units very high priority. The Council would also expect at least 40% of market housing to provide two bedroom units. The proposal would therefore comply with LDF policies in this instance.
- 6.26 Policy DP6 requires all new dwellings, including conversions, to be built to Lifetime Homes standards wherever possible. The adopted CPG2 advises that listed buildings should incorporate accessible features. A Lifetime Homes assessment was submitted as part of the application and it outlines those measures of the Lifetime Homes criteria which would be met. Given that the listed building status provides significant constraints to meeting all of the relevant criteria, it would be unreasonable to expect the proposal to comply with all Lifetime Homes Standards. It is considered that the applicant has sought to comply with the requirements as far as practicable in the context of the site, and the proposal complies with policy DP6.
- 6.27 In accordance with CPG2 Housing, all habitable rooms feature a minimum headroom of 2.3m.

Internal light

- 6.28 The ADF method quantifies the level of daylight in a room (kitchen, living room and bedroom), to establish whether each habitable room will have a predominantly daylight appearance. The minimum levels for different room types are Kitchens: 2%; Living rooms: 1.5% and Bedrooms: 1%.
- 6.29 In terms of the existing arrangement, a number of factors restrict access to daylight and sunlight, namely:
- The distance and height of surrounding building to the rear on Kingsway from the rear elevation of No.64 Lincoln's Inn Fields
 - The limited scope to enlarge fenestration to the façades given its designation, form and design.
- 6.30 The opportunity to maximise access to daylight and sunlight and/or achieve the minimum ADF levels for future developments at No.64 Lincoln's Inn Fields is therefore constrained.
- 6.31 The applicant has submitted a daylight and sunlight report, in accordance with CPG6 (Amenity). In total, 4 out of 6 living rooms on the lower ground, ground, first, second and third floor levels and a total of 19 out of 24 bedrooms on these floors meet the BRE Guidelines for their room use. Of the five rooms that do not meet the recommended levels in the BRE Guidelines, the scope to improve levels are limited for those reasons above and in some cases are existing conditions.
- 6.32 In accordance with CPG6, while the Council supports the aims of the BRE methodology (ADF) for assessing sunlight and daylight, the results must be considered flexibly. The BRE makes clear that in highly urbanised areas, the guidance will not always be met, and values should only ever be used as 'guidance', it is not a mandatory or statutory document to be applied rigidly.

Privacy (within development)

- 6.33 With particular regard to flat 1 located at the rear (mews house), it is considered the proposed screening and arrangement and alignment of windows would not result in mutual overlooking with those flats to the rear of the main building. Views would be suitably redirected or obscured with screening. (See **Adjacent residential amenity** for assessment of adjacent accommodation)
- 6.34 Within this context and given the constraints of the site, it is considered that each of the proposed units would provide a good standard of living accommodation, 4 of which would be of high priority to Camden's housing stock.

Design/Townscape

Elevational and internal alterations

- 6.35 Whilst the general plan form, central chimney breast and staircase are of significance, overall the interior has been refurbished (including the insertion of a lift) which result in few features of note surviving.

- 6.36 The proposal to convert to residential offers some benefits in terms of restoring the original use although each unit requires a bathroom and kitchen which necessitates some subdivision. Given the size of the building it is unlikely that it would be viable to convert it to a single residential dwelling.
- 6.37 Whilst the partitioning of the interior does cause a degree of harm to the interior it is noted that the front room proportions facing onto the square are left unaltered with only the lesser rooms at the rear subdivided. The partitioning would be reversible and therefore is considered acceptable. No concerns are raised regarding the insertion of services for the kitchens and bathrooms.
- 6.38 Secondary glazing is proposed to all windows. The window reveals in the building feature no shutters or panelled reveals of note. The secondary glazing would be set immediately behind the sashes and with the meeting rail and framing aligned so from the outside there would be no visual impact.
- 6.39 Other than works of repair to the façade and the removal of the non-original stairs to the lightwell there is no change to this façade. The alterations within the front courtyard, namely the refuse area and fixed gate, are considered of limited impact.

Rear extensions

- 6.40 As part of this application English Heritage was consulted, as were neighbouring occupiers and objections have been received on the grounds, amongst other issues, that the extension (originally proposed) was the full height of the building and covered most of the rear façade, harming the special historic interest of the listed building and the setting of those listed buildings adjacent.
- 6.41 The submitted heritage statement indicates that the wing on the north side of the building dates from the late 18th or early 19th century, the central 2 storey wing from the late 19th century. On the southern side it appears that originally there was a rear closet wing which was removed in 1977 and the rear façade rebuilt, resulting in 'cleaner' brickwork than the rest of the façade.
- 6.42 The two storey central wing, whilst not being original is of a date to make it of some significance to the building and its loss is therefore unacceptable. The resultant replacement extension would also cover over a significant portion of the rear façade and internalise the staircase.
- 6.43 As a result, the demolition of existing 2 storey rear extension located at lower ground floor level was removed from the scheme and therein removing the replacement 5 storey rear extension. The 4m (width) extension along the rear elevation, at a depth of 3m up to main roof level, thereby mirroring the existing extension on the building (to the north-east) that remains would essentially reinstate the original structure removed in 1977.
- 6.44 The significant alterations to the rear elevation are therefore the 4m (width) extension along the rear elevation, at a depth of 3m up to main roof level, the replacement of brickwork 'cleaned' as a result of works in 1977 along with new fenestration alterations. The simple form and appearance of the existing building is

therefore maintained whilst the extensions and alterations proposed are in keeping with the host building and its historic form.

Replacement vault 2 storey extension

- 6.45 To the rear there are currently arched vaults clad in ceramic tiles. It is suggested that these date from a period between 1913 and 1951 and probably were used as storage for files. Having reviewed the evidence this seems a reasonable assumption. Whilst these vaults are of some interest they are a much later addition and only show evidence of one use of the building rather than being of any great historic or architectural interest. There would therefore be no objection to their removal.
- 6.46 It is proposed to place a two storey extension in this space which would not rise above the boundary walls with the surrounding properties and would be visually separated from the original building by open space which would clearly distinguish it as a separate element. Given that the rear of the plot is already wholly developed and this part of the site is wholly enclosed the principle of development is considered acceptable. The overall scale, siting and modest design is also subservient to the adjoining buildings. Given that the adjacent building of No.63 is of significant bulk, the consolidated mass to the rear of the building would not alter the relationship within its neighbouring buildings.

Adjacent residential amenity

Daylight/sunlight

- 6.47 The upper floors of No.40-42 Kingsway are in residential use, however the rearward windows all serve stairwells rather than habitable accommodation. The upper floor levels of Nos.44-46 Kingsway are in residential use. The rear elevation windows are split between those serving habitable accommodation and those serving a stairwell. The proposed 2 storey rear extension which replaces vaults would extend across a window serving a stairwell at 1st floor level, albeit from a distance of 1.8m. The extensions would however sit below any windows serving habitable accommodation. With this said however, the analysis indicates that all windows serving habitable accommodation to Nos.40-42 and 44-46 would meet or exceed the levels recommended in the BRE Guidelines, which forms the basis of daylight impact assessment in accordance with CPG6.
- 6.48 The location and terminating height of the proposed 2 storey rear extension (which replaces vaults), set below adjacent boundary walls would not result in material harm to windows serving Nos.63, 65-66 Lincoln's Inn Fields and Nos.40-42, 44-46 and 48-56 Kingsway.

Overlooking/visual privacy

- 6.49 A 4m section (width) of the rear façade of 64 Lincoln's Inn Fields would be brought rearward by 3m. As a result, the rear façade of 64 Lincoln's Inn Fields would be 9m from the rear façade of No.40-42 Kingsway, this elevation is however only served by windows associated with stairwells.

- 6.50 With regard to Nos.44-46 Kingsway, the resulting extension (replacing the mismatched brickwork area of the rear elevation) would be 17m from 64 Lincoln's Inn Fields.
- 6.51 The distance between 64 Lincoln's Inn Fields and Nos. 48-56 Kingsway would see no change and remains 12m in distance.
- 6.52 In assessment of CPG6, to ensure privacy, there should normally be a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other. This minimum requirement will be the distance between the two closest points on each building (including balconies). Given the existing arrangement of 9m-17m, this would not be achievable and therefore one must assess if the change of use would result in a material loss of privacy to those residing in the locale, particularly Nos.44-46 Kingsway
- 6.53 The use of 64 Lincoln's Inn Fields comprises offices at each level, without restricted hours. Overlooking to windows serving Nos.44-46 Kingsway at a distance of 17m could therefore take place 24 hours a day, or most likely at extended periods outside of the typical 9am-6pm time slot when most residents would be at work. This is important context to consider, unlike if the site were vacant and a new building was to be created.
- 6.54 Given the nature of the proposal, the existing location of window openings being brought rearward by 3m and an existing arrangement of 17m distance, there can be a reasonable justification to depart from the from the CPG6 guidance in this instance without a harmful loss of privacy in this instance. The relationship is also commensurate with many historic terraces in Central London.
- 6.55 With regard to mitigating methods, whilst the introduction of obscurely glazed/frittered windows could limit privacy conflict, the loss of light to those rooms they would serve as a result would outweigh its benefit.
- 6.56 The replacement vault 2 storey extension would not comprise windows facing Nos.40-42, 44-46 and 48-56 Kingsway, but rather the rear façade of 64 Lincoln's Inn Fields, albeit at lower ground and ground floor level.

Noise

- 6.57 The applicant has also submitted an acoustic report and background noise survey related to the plant unit located at main roof level, which includes calculations of predicted noise levels to support compliance with the Council's standards. This element shall be subject to the standard recommended condition regulating odour, noise and vibration level.

Transport, access and parking

- 6.58 The application site is located within the Central London Area with easy access to shops and services. The site has a PTAL of 6b (excellent), which indicates that it has an excellent level of accessibility by public transport.

Cycle parking

- 6.59 The applicant has provided cycle storage spaces located at lower ground floor level, compliant with guidance forming part of CPG 7 (transport). The layout and number of cycle spaces (14) shall be secured by way of a condition.

Car-free development

- 6.60 The London Plan 2011 and policy DP18 of the LDF identify that car-free and car-capped should not only be sought for housing but also for developments in general and should be ensured by Boroughs in areas of high public transport accessibility. In accordance with Policies DP18 and DP19, the new residential units should therefore be made car-free, (with no-off or on-street parking in association within this development) secured by a Section 106 planning obligation. As a result, access to the existing off-street parking spaces shall be removed (secured by condition). The applicant has accepted the principle of the car-free housing and payment of the Council's legal fees.

Construction Management Plan

- 6.61 Policy DP21 seeks to protect the safety and operation of the highway network and for some development this may require control over how the development is implemented (including demolition and construction) through a Construction Management Plan (CMP) secured via a Section 106 Agreement. The site falls within Bloomsbury Conservation Area and vehicles travelling through the area must be considerate of this. During the period of construction vehicles may be displaced and may need to park on street and with a narrow pavement (with a relatively high footfall) it is therefore recommended that the CMP is secured by a Section 106 agreement, as will a Travel Plan Statement, as offered in the applicants own Transport Statement.

Pedestrian, Cycling and Environmental Improvements

- 6.62 Given the extensive nature of works proposed a financial contribution will be required to repave the footway, this is in connection to DP21. This work and any other work that needs to be undertaken within the highway reservation will need to be secured through a Section 106 Agreement with the Council. The Council will undertake all works within the highway reservation, at the cost to the developer. The contribution would need to be secured through a Section 106 Agreement with the Council.
- 6.63 Camden's Core Strategy details a number of strategic transport projects which are currently being developed in the borough. There is anticipated to be a significant level of short distance pedestrian trips between the site and nearby transport interchanges. These additional trips would have an impact on the surrounding footways and public transport facilities. The Council generally seek a financial contribution to help to mitigate such impacts while also helping to encourage sustainable transport choices.
- 6.64 Taking all of the above points into consideration, the Council are seeking to secure a financial contribution towards pedestrian, cycling and environmental improvements in the vicinity of the site for both schemes. The contribution would need to be secured through a Section 106 Agreement with the Council.

Sustainability - resources and energy

- 6.65 Owing to the scale and nature of the proposed development (conversion of over 500sqm), an Energy and Sustainability statement has been submitted with the application. London Plan climate change policies in chapter 5, Camden's Core Strategy policy CS13 and Development Policies DP22 and DP23 require all developments to contribute to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.
- 6.66 The overall approach to energy should be in line with the Mayor's Energy Hierarchy (i) using less energy; ii) supplying energy efficiently; iii) using renewable energy. In line with the first element of the hierarchy and with LDF and CPG requirements Energy and Sustainability assessments were submitted for the new residential units. Camden's CPG requires a minimum rating of 'excellent' with a score of 60% in the energy, 60% in the water and 40% in the materials categories for the building.
- 6.67 In this case the applicants' pre-assessment suggests that a 'Very Good' rating of 69.46% can be achieved (70% to reach 'excellent') with a score of 79% in the energy, 60% in the water and 55% in the materials categories for the building. Due to the listed status of the building it is considered that this score is appropriate.
- 6.68 The sustainability and energy features outlined in the assessment will be secured via the Section 106 agreement and a post construction assessment will be carried out.

S106 / Other Matters

- 6.69 Calculated in accordance with CPG6 formula, it is not practical to provide on-site open space, therefore the contribution is £10,801 and is required towards the provision of or improvements to public open space in the area, which includes maintenance costs over a five-year period. This would be secured by s106.
- 6.70 In accordance with Camden's Planning Policy and Section 21 of Camden Planning Guidance, the contribution is £15,174, towards educational infrastructure.

Training and employment contribution

- 6.71 In accordance with CPG8 formula, a training and employment contribution of £35,750 to mitigate against the loss of employment opportunities for our residents represented by this loss of employment space.

Local employment and procurement

- 6.72 The proposed development at 1100m² has the potential to generate significant local economic benefits. Therefore local recruitment and work placement opportunities exclusively with the Kings Cross Construction Skills Centre shall be secured by s106.

Community Infrastructure Levy

- 6.73 The proposal will be liable for the Mayor of London's CIL Based on the Mayor's CIL charging schedule. This will be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability,

submit a commencement notice and late payment, or and indexation in line with the construction costs index.

7. CONCLUSION

7.1 The proposed development is considered to incorporate a suitable use within the building, which constitutes 'older' accommodation and for which there is limited scope for it continue within a Class B use.

7.2 In terms of design, the proposed changes are considered appropriate for the listed building, and would preserve the character and appearance of the conservation area. The proposed development also accords with mandatory sustainability requirements and is not considered to give rise to any substantial transport concerns.

7.3 Planning Permission is recommended subject to a S106 Legal Agreement covering the following Heads of Terms:-

- S106 for affordable housing contribution - £320,650
- S106 for BREEAM pre-assessment and post-construction review
- S106 open space financial contribution - £10,801
- S106 education financial contribution - £15,174
- S106 for car-free development
- S106 for Construction Management Plan
- S106 Travel Plan Statement
- S106 for training and employment contribution - £35,750
- S106 financial contribution for various Highway and Public Realm Improvement Works adjacent to the site
- S106 for pedestrian, environmental and safety improvement initiative contribution
- S106 Local employment and procurement

8. LEGAL COMMENTS

8.1 Members are referred to the note from the Legal Division at the start of the Agenda.

Condition(s) and Reason(s): **2013/7434/P**

- 1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans [L(00)010 Rev A; L(00)100 Rev A; L(00)101 Rev A; L(00)102 Rev A; L(00)102 Rev A; L(00)103 Rev A; L(00)104 Rev A; L(00)105 Rev A; L(00)110 Rev A; L(00)111 Rev A; L(00)113 Rev A; L(00)114 Rev A; L(00)121 Rev A; L(00)130 Rev B; L(00)131 Rev B; L(00)132 Rev B; L(00)133 Rev B; L(00)134 Rev B; L(00)135 Rev B; L(00)140 Rev B; L(00)141 Rev A; L(00)143 Rev A; L(00)144 Rev B; L(00)151 Rev A; L(00)200 Rev F; L(00)201 Rev F; L(00)202 Rev D; L(00)203 Rev D; L(00)204 Rev D; L(00)205 Rev D; L(00)210 Rev D; L(00)213 Rev C; L(00)214 Rev D; L(00)219 Rev D; L(00)221 Rev B; BREEAM Domestic Refurbishment Pre-Assessment Report, Prepared by Price & Myers, dated 08/11/2013; Energy Statement, prepared by Slender Winter Partnership LTD, dated November 2013; Daylight & Sunlight Report, prepared by Waldrams, dated 13th November 2013, Flood Risk Assessment, Prepared by Price & Myers, dated October 2013; Environmental Noise Survey & Plant Noise assessment report 19665/PN1, prepared by Hann Tucker Associates, dated 6th November 2012, affordable housing letter, prepared by Raoul Veevers, dated 21st August 2014.]

Reason: For the avoidance of doubt and in the interest of proper planning.

- 3 No development shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological mitigation in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the local planning authority. The development shall then only take place in accordance with the Written Scheme as has been approved.

Reason: Important archaeological remains may exist on this site. Accordingly the Council wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

- 4 The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 3, and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.

Reason: Important archaeological remains may exist on this site. Accordingly the Council wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

- 5 Before the development commences, details of secure and covered cycle storage area for 14 cycles shall be submitted to and approved by the local planning authority. The approved facility shall thereafter be provided in its entirety prior to the first occupation of any of the new units, and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policy DP17 of the London Borough of Camden Local Development Framework Development Policies.

- 6 A sample panel of the facing brickwork demonstrating the proposed colour, texture, face-bond and pointing shall be provided on site and approved in writing by the local planning authority before the relevant parts of the works are commenced and the development shall be carried out in accordance with the approval given. The approved panel shall be retained on site until the work has been completed.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

- 7 No development shall take place until full details of hard and soft landscaping and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.

- 8 Noise levels at a point 1 metre external to sensitive facades shall be at least 5dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 10dB(A) below the LA90, expressed in dB(A).

Reason: To safeguard the amenities of the [adjoining] premises and the area generally in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

- 9 Notwithstanding the approved drawings, prior to the first use of the premises for the C3 use hereby permitted, details shall be submitted to and approved in writing by the local planning authority, in respect of the fixed front boundary and shall be permanently retained thereafter.

Reason: To ensure that the use of the premises does not add to parking pressures in surrounding streets which would be contrary to policies CS11 and CS19 of the London Borough of Camden Local Development Framework Core Strategy and policy DP18 of the London Borough of Camden Local Development Framework Development Policies.

Informative(s):

- 1 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts which cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Argyle Street WC1H 8EQ, (tel: 020-7974 6941).
- 2 Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Compliance and Enforcement team [Regulatory Services], Camden Town Hall, Argyle Street, WC1H 8EQ (Tel. No. 020 7974 4444 or on the website <http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-the-environmental-health-team.en> or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.
- 3 Written schemes of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with English Heritage Greater London Archaeology guidelines.
- 4 This site is within an area of archaeological significance/archaeological potential where development is likely to result in the destruction of ancient remains. Your attention is drawn to the British Archaeologists and Developers Liaison Group Code of Practice agreed by the British Property Federation and the Standing Conference of Archaeological Unit Managers. The Council recognises and endorses this Code and will expect the developer and approved archaeological organisations to abide by its provisions.
- 5 Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.

- 6 You are reminded that this decision only grants permission for permanent residential accommodation (Class C3). Any alternative use of the residential units for temporary accommodation, i.e. for periods of less than 90 days for tourist or short term lets etc, would constitute a material change of use and would require a further grant of planning permission.

Condition(s) and Reason(s): **2013/7457/L**

- 1 The works hereby permitted shall be begun not later than the end of three years from the date of this consent.

Reason: In order to comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- 2 Detailed drawings, or samples of materials as appropriate, in respect of the works shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:

a) Typical details of new railings, gates and piers to front elevation at a scale of 1:1, including materials, finish and method of fixing into the plinth

b) Plan, elevation and section drawings of all new windows to the rear elevation of the main building at a scale of 1:10 with typical glazing bar details at 1:1.

c) Samples and/or manufacturer's details of new facing materials for the rear elevation of the house (to be provided on site and retained on site during the course of the works)

d) Details of service runs for all new bathrooms/kitchens, demonstrating the relationship of new pipework with the structure of the building.

The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy CS14 of the London Plan 2016 and policy DP1 of the London Borough of Camden Local Development Framework Development Plan 2016.

- 3 All new external and internal works and finishes and works of making good to retained fabric, shall match the existing adjacent work with regard to the materials used and to material, colour, texture and profile, unless shown otherwise on drawings or other documentation hereby approved or required by any conditions attached to this consent.


Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy CS14 of the London Plan 2016 and policy DP1 of the London Borough of Camden Local Development Framework Development Plan 2016.

Informative(s):

- 1 Your proposals may be subject to control under the Building Regulations and London Buildings Acts which cover aspects including fire and emergency e access and facilities for people with disabilities and sound insulation be dwellings. You are advised to consult the Council's Building Control S Camden Town Hall, Argyle Street WC1H 8EQ, (tel: 020-7974 6941).

- 2 Noise from demolition and construction works is subject to control und Control of Pollution Act 1974. You must carry out any building works that c heard at the boundary of the site only between 08.00 and 18.00 hours Mon Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Holidays. You are advised to consult the Council's Noise and Lic Enforcement Team, Camden Town Hall, Argyle Street, WC1H 8EQ (Tel. N 7974 4444 or on the w <http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-the-environmental-health-team.en> or seek approval under Section 61 of the Act if you anticipate any difficulty in carryi construction other than within the hours stated above.



	<p>Application No: 2013/7434/P & 2013/7457/L</p> <p>64 Lincoln's Inn Fields</p> <p>London</p> <p>WC2A 3JX</p>	<p>Scale: 1:1023</p> <p>Date: 10-Oct-14</p>	<p>N</p> 
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Site Plan (© Bluesky)



No. 64 Lincoln's Inn Fields



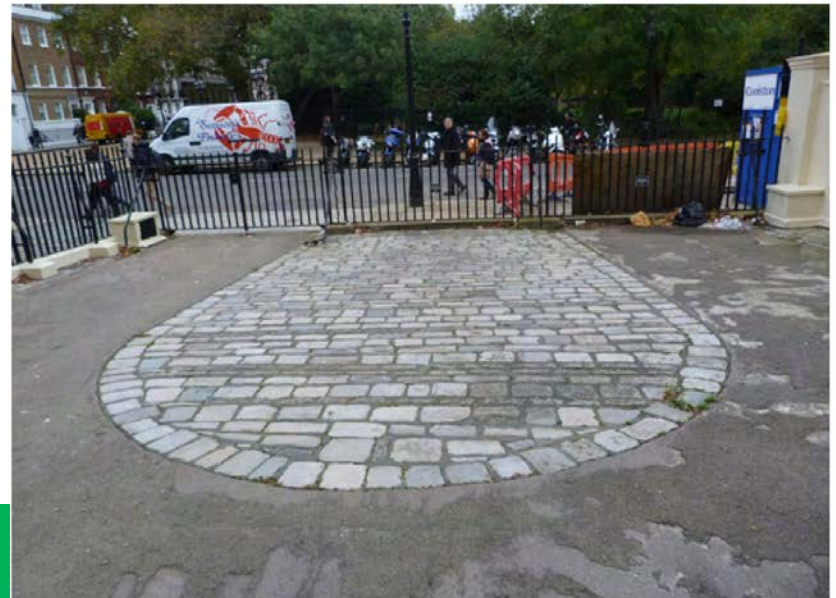
64 Lincoln's Inn Fields front elevation



64 Lincoln's Inn Fields



Northern lightwell with modern metal steps



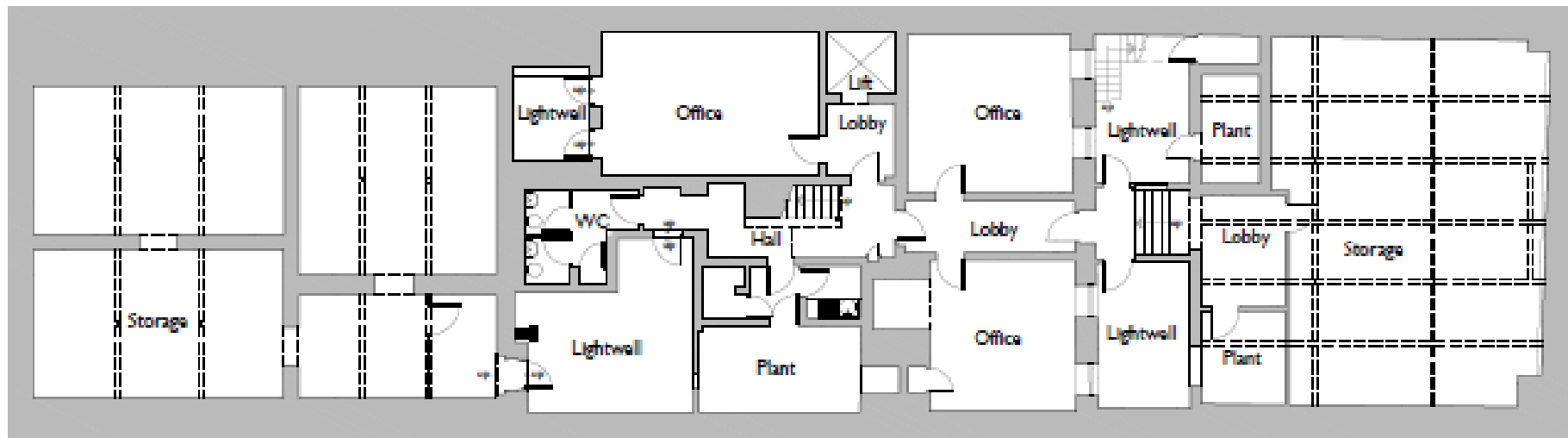
Paved and tarmacked driveway area

64 Lincoln's Inn Fields rear elevation

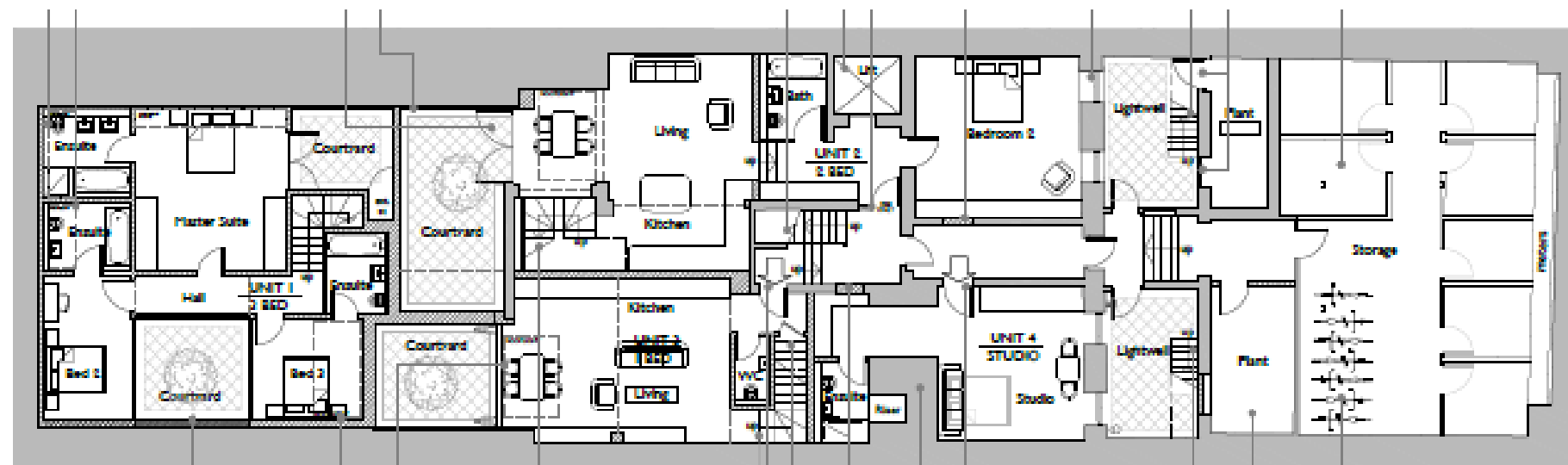


- 1 Rear façade of No.64
- 2 Detail of divide between central and right hand sections of the elevation
- 3 Ground to second floor windows of the stairwell behind the toilet block extension
- 4 Blocked up windows on south side of the toilet block
- 5 Northern lightwell to the rear of No.64
- 6 Upper level of basement to the rear of the property and southern lightwell

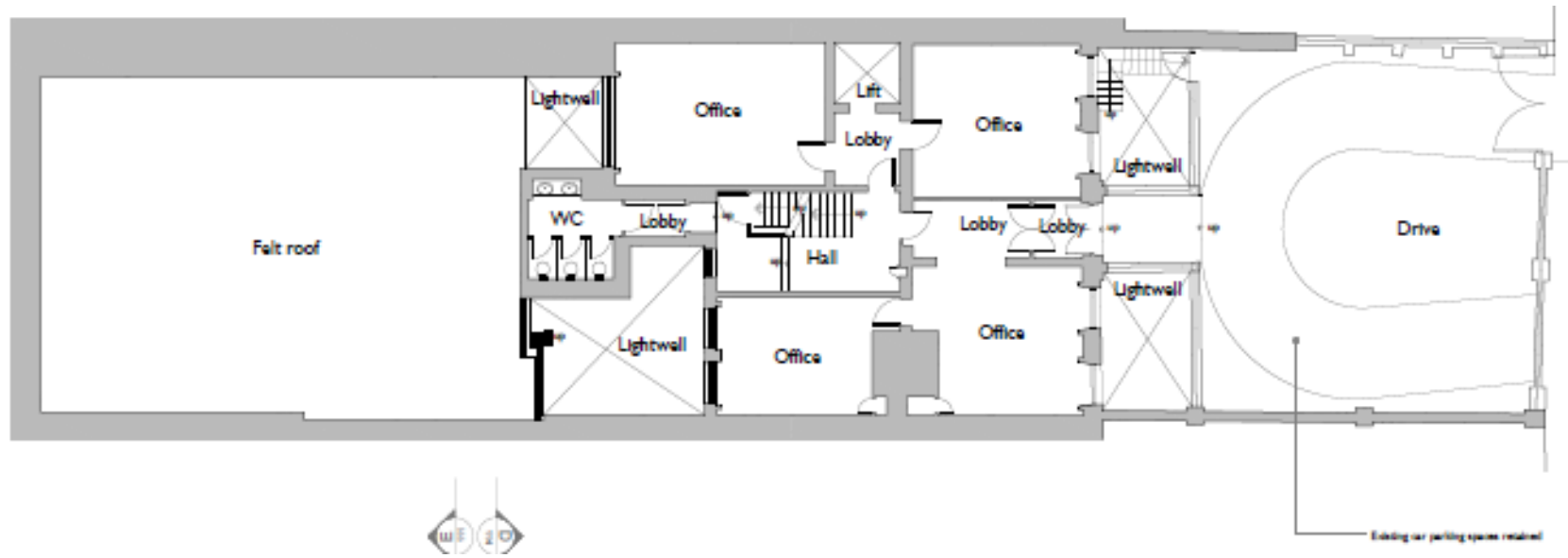
Existing lower ground floor plan



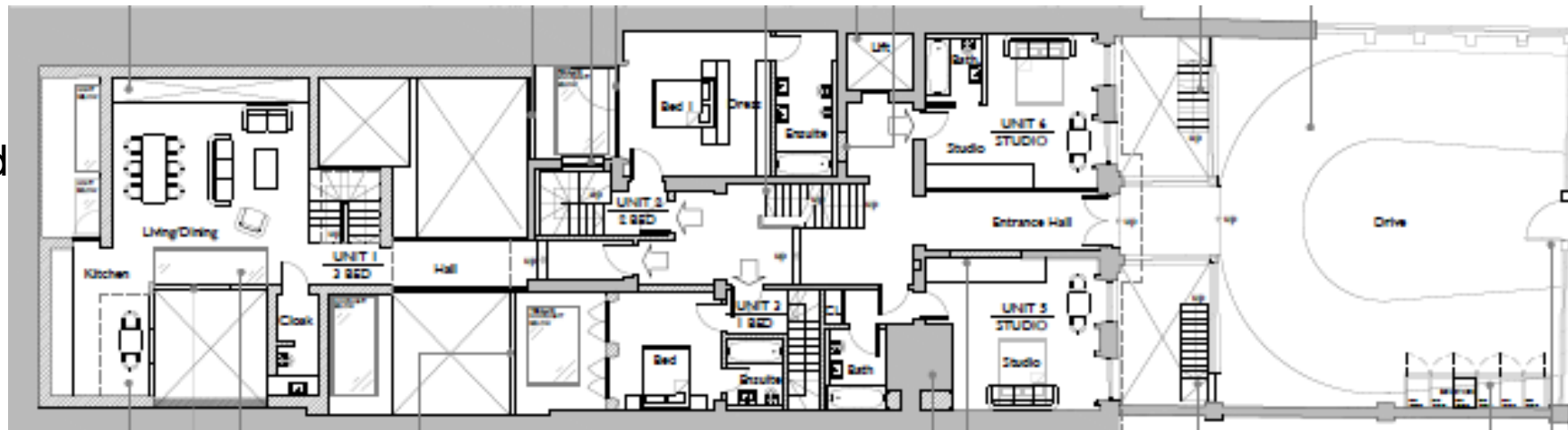
Proposed lower ground floor plan



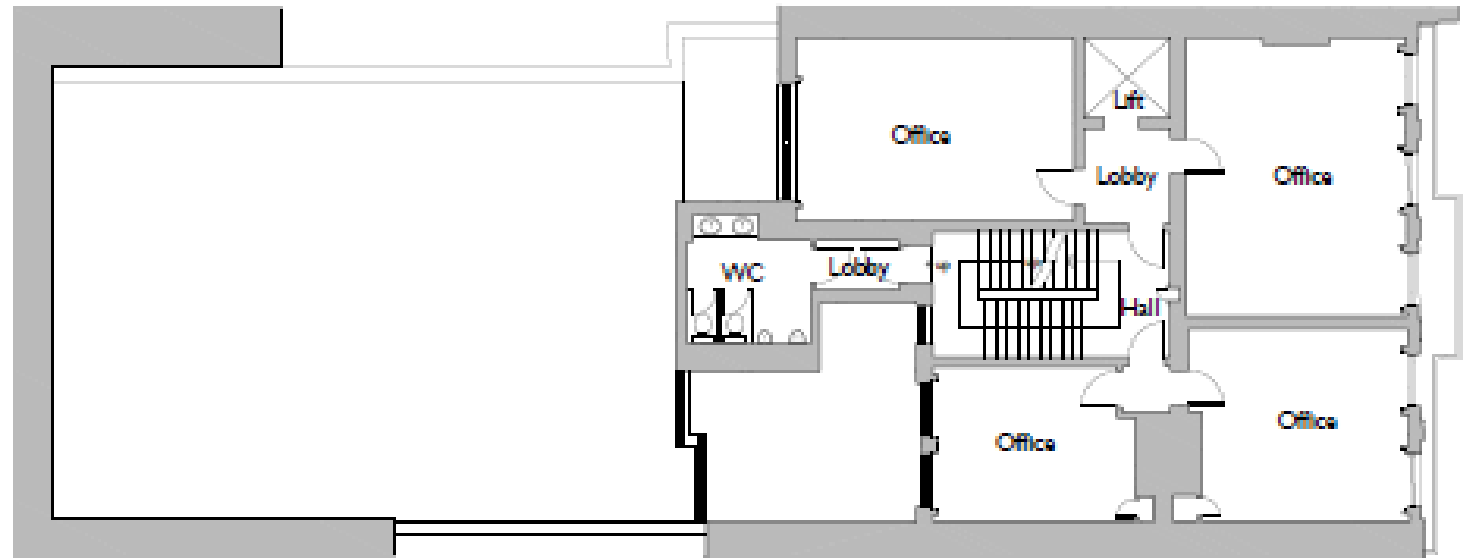
Existing ground floor plan



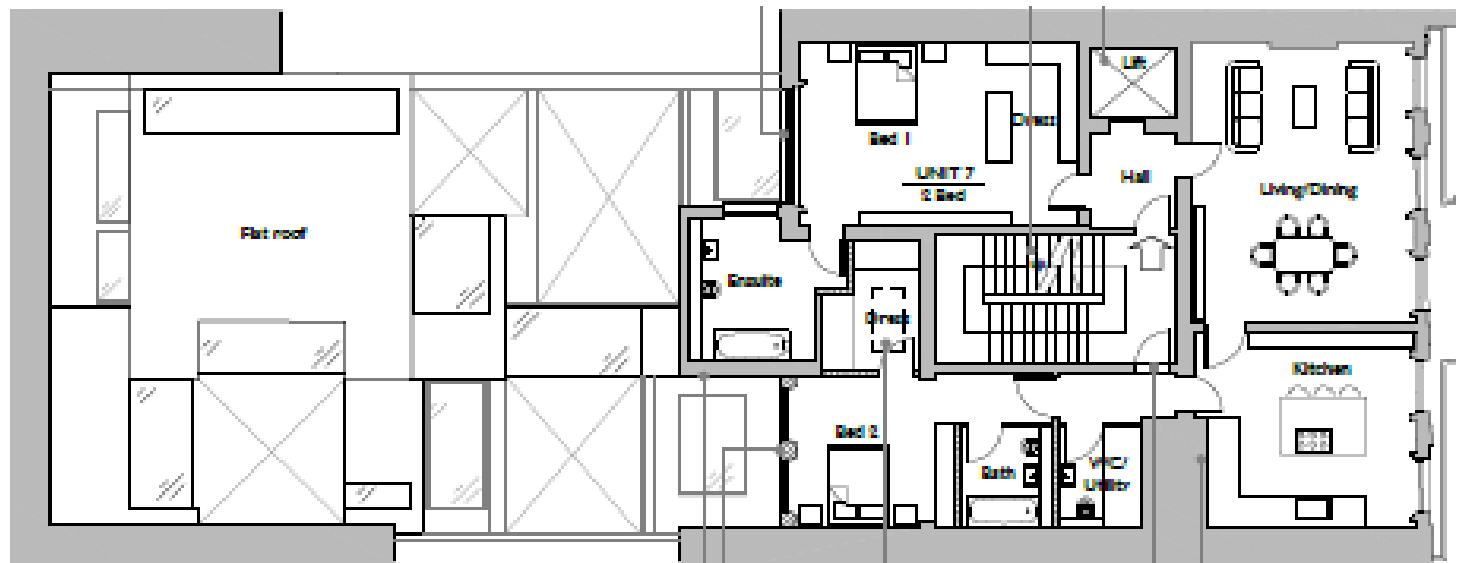
Proposed ground floor plan



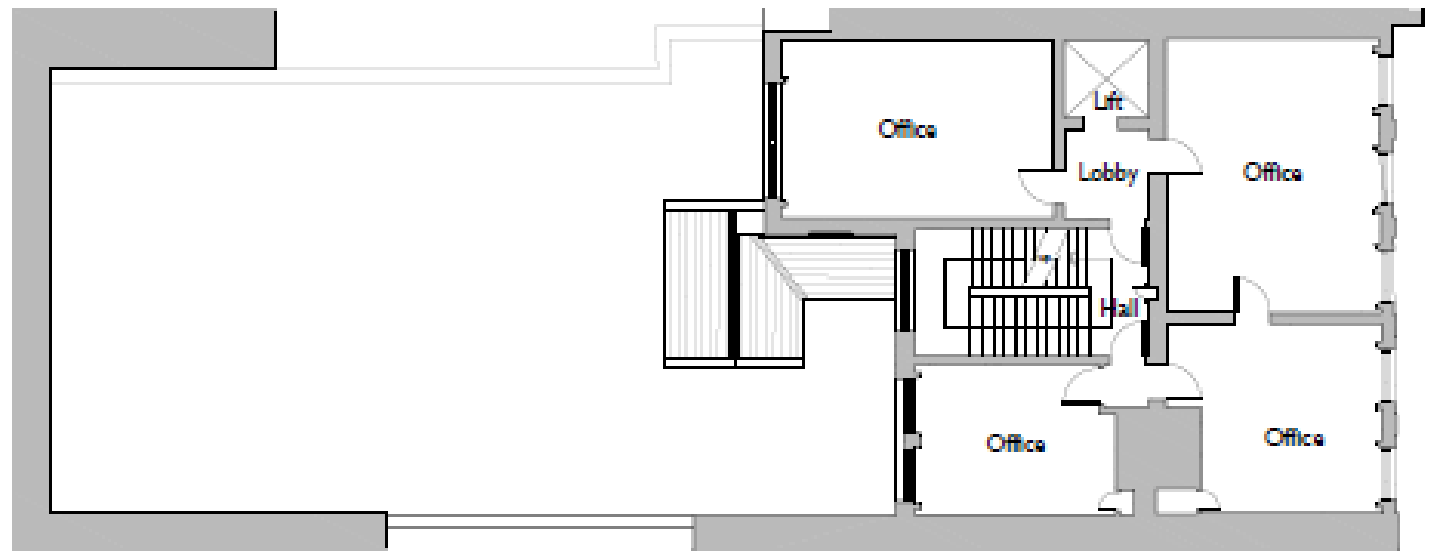
Existing first floor plan



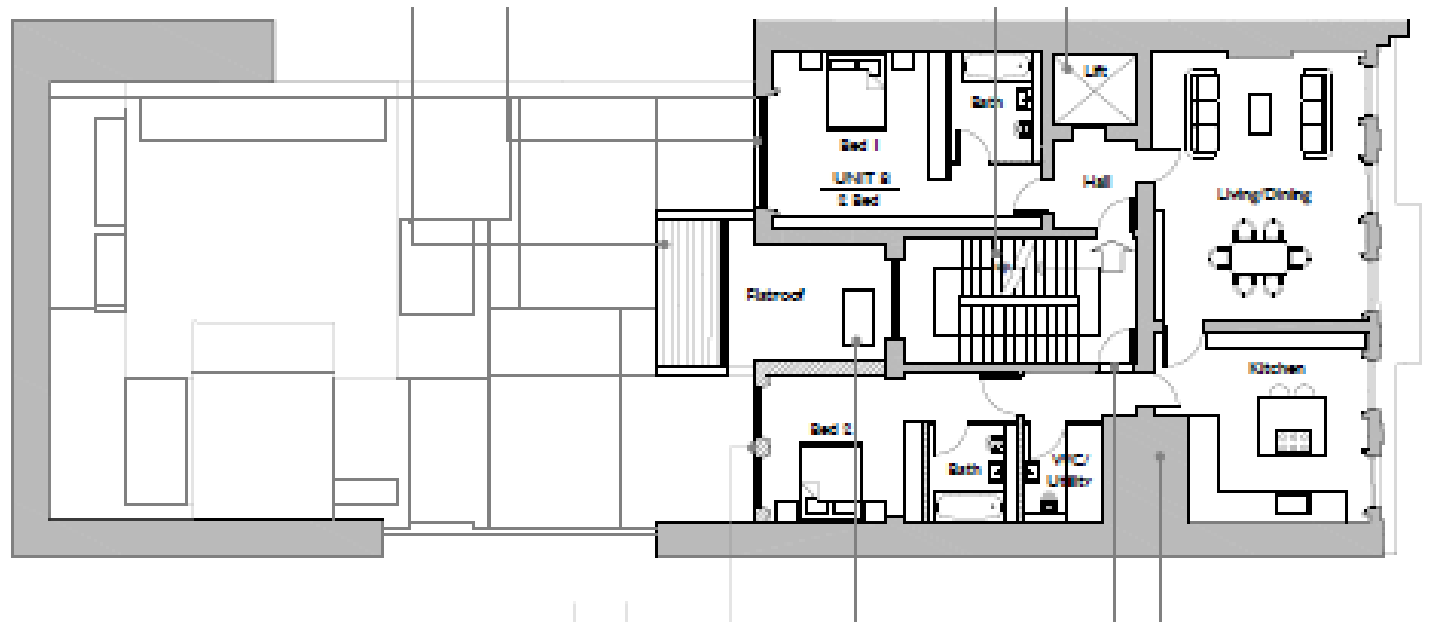
Proposed first floor plan



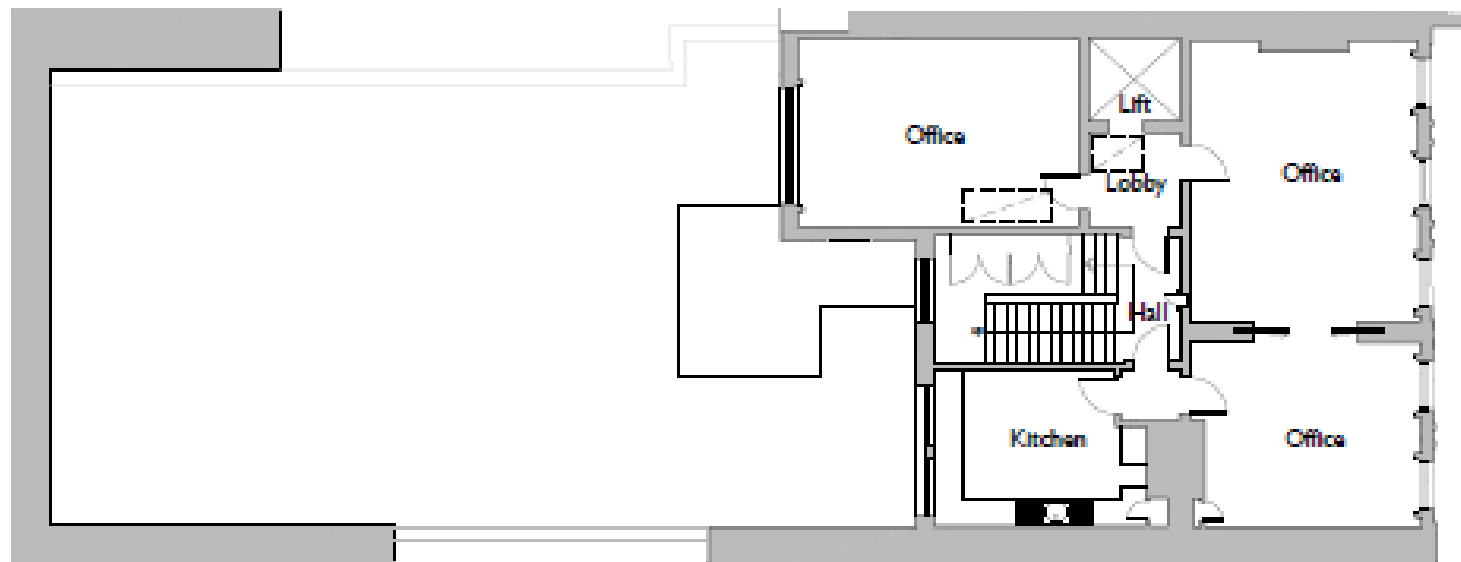
Existing second floor plan



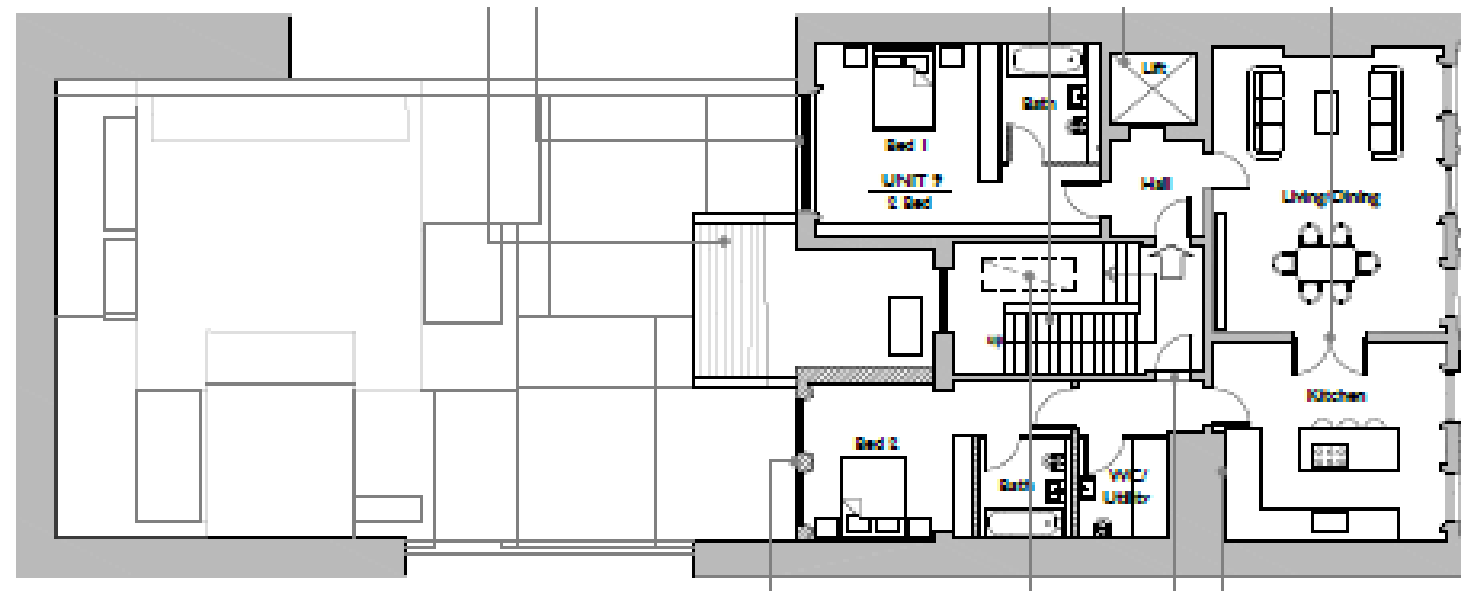
Proposed second floor plan



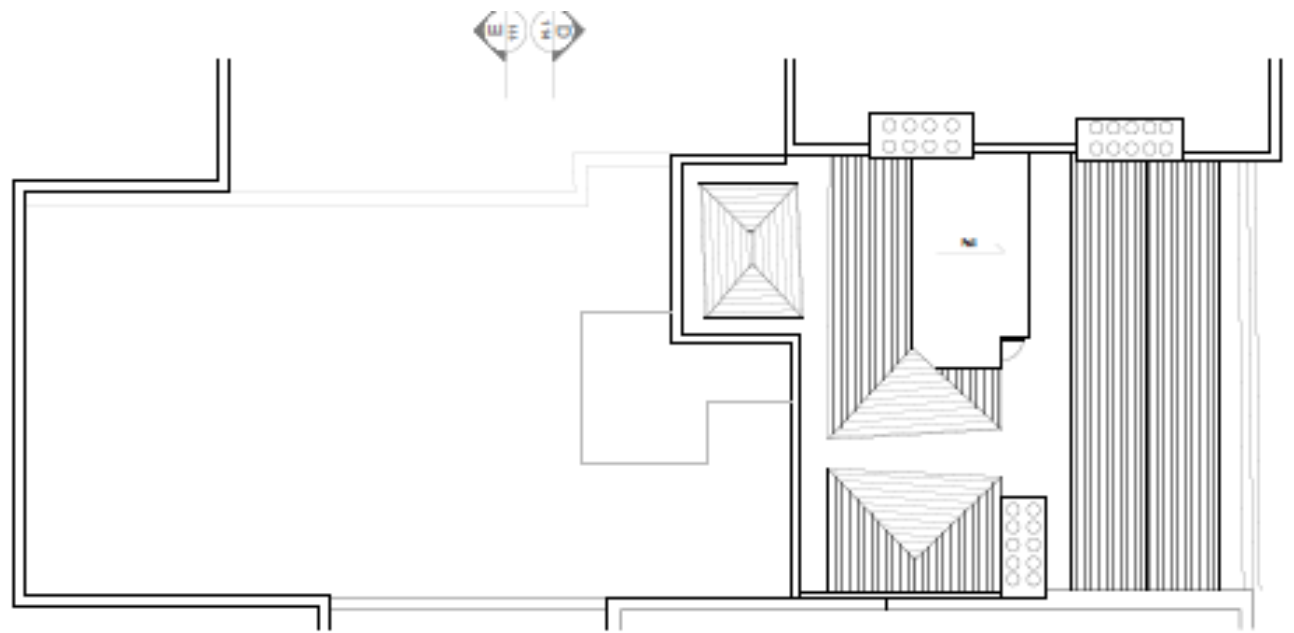
Existing third floor plan



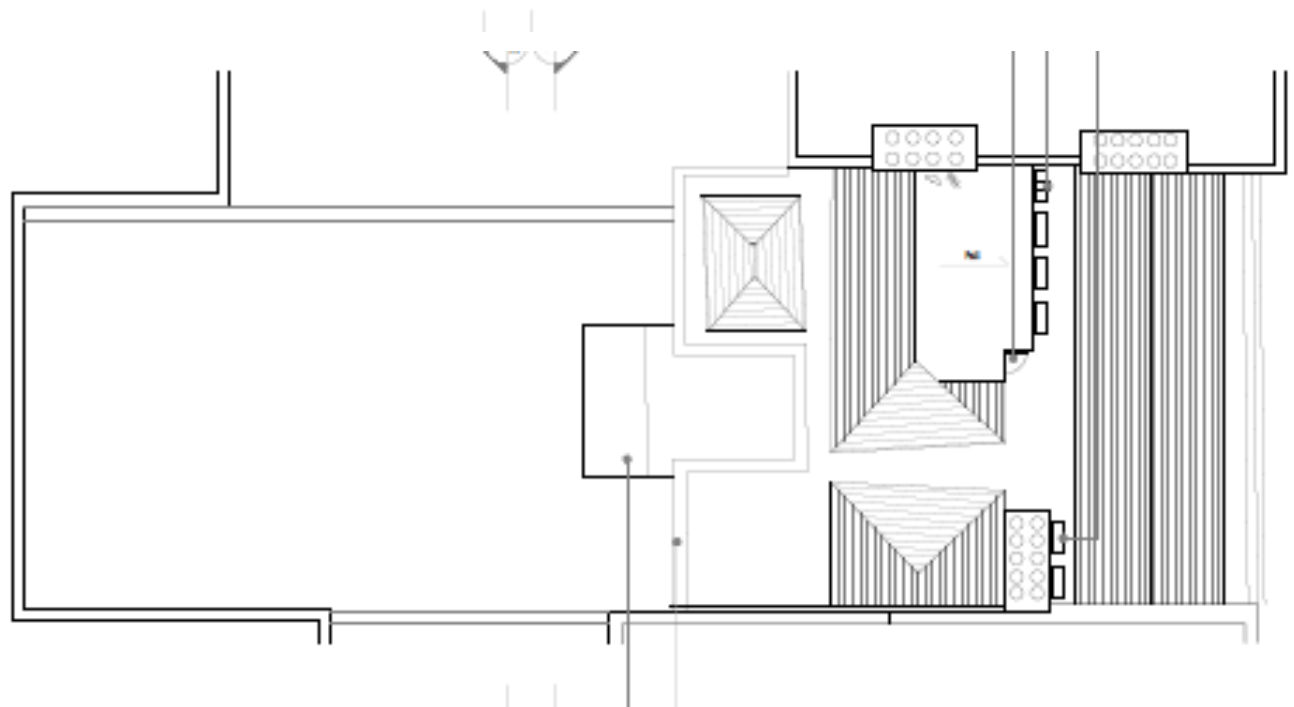
Proposed third floor plan



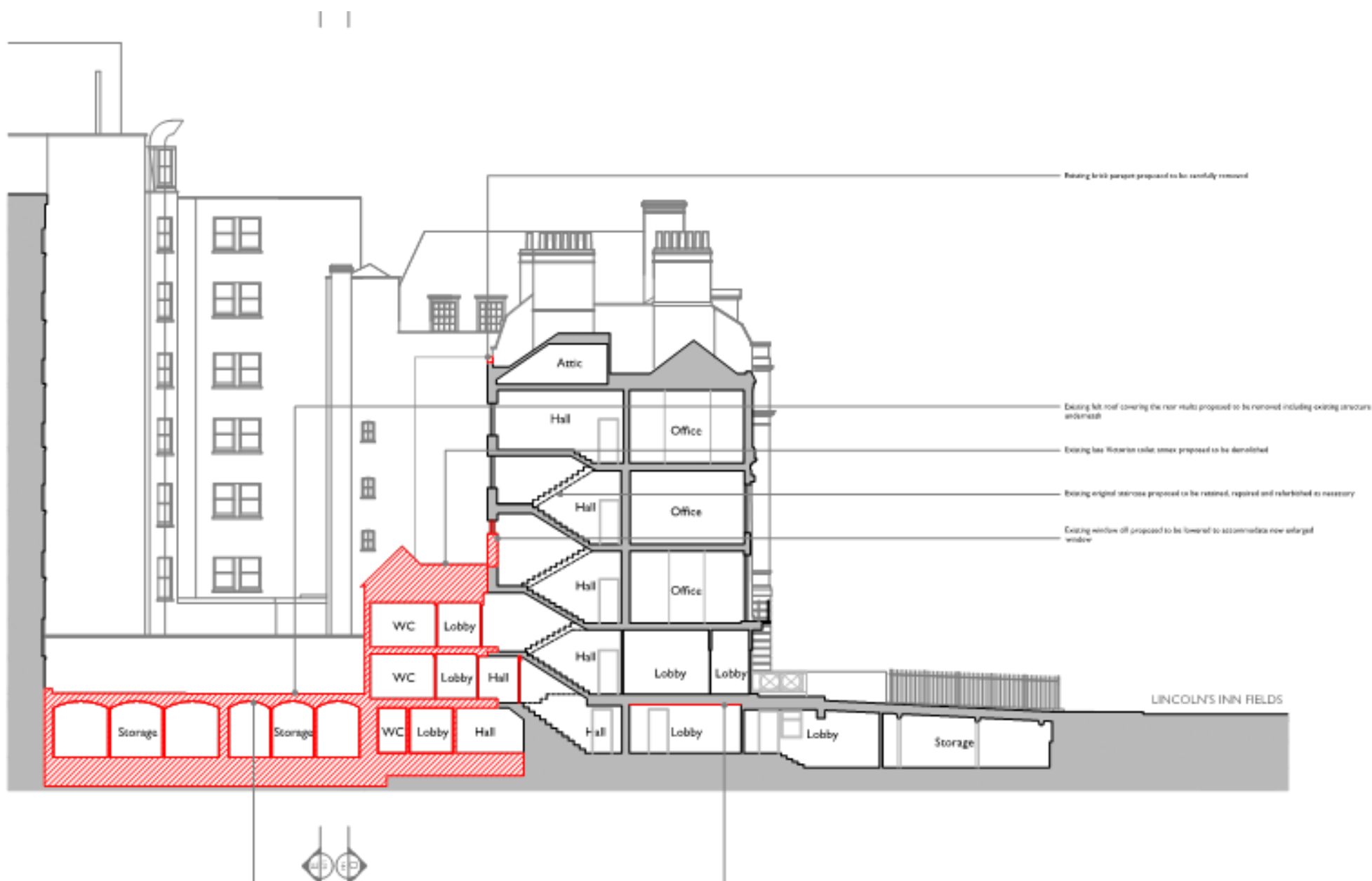
Existing roof plan



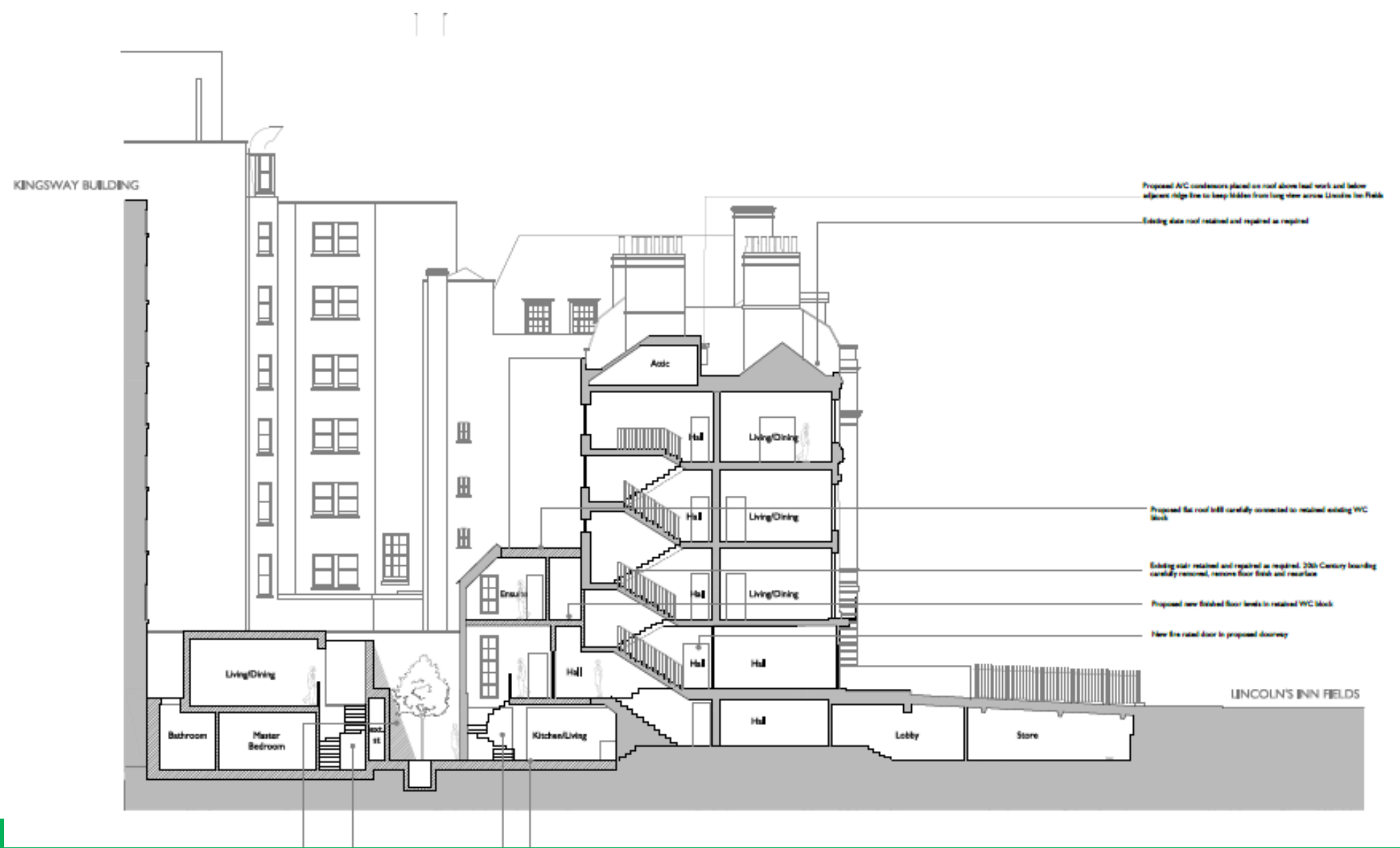
Proposed roof plan



Existing section A **red to be demolished**



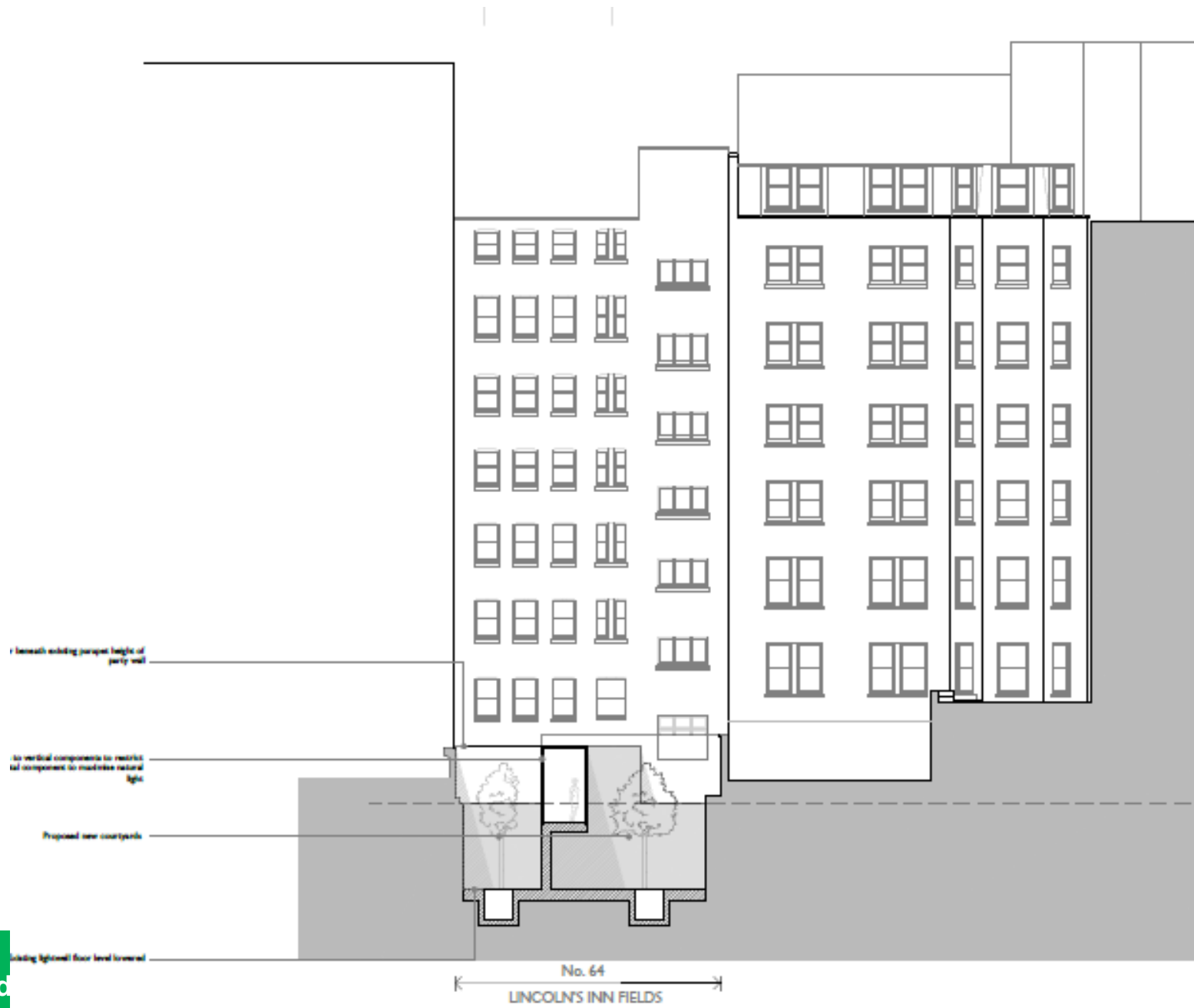
Proposed section A



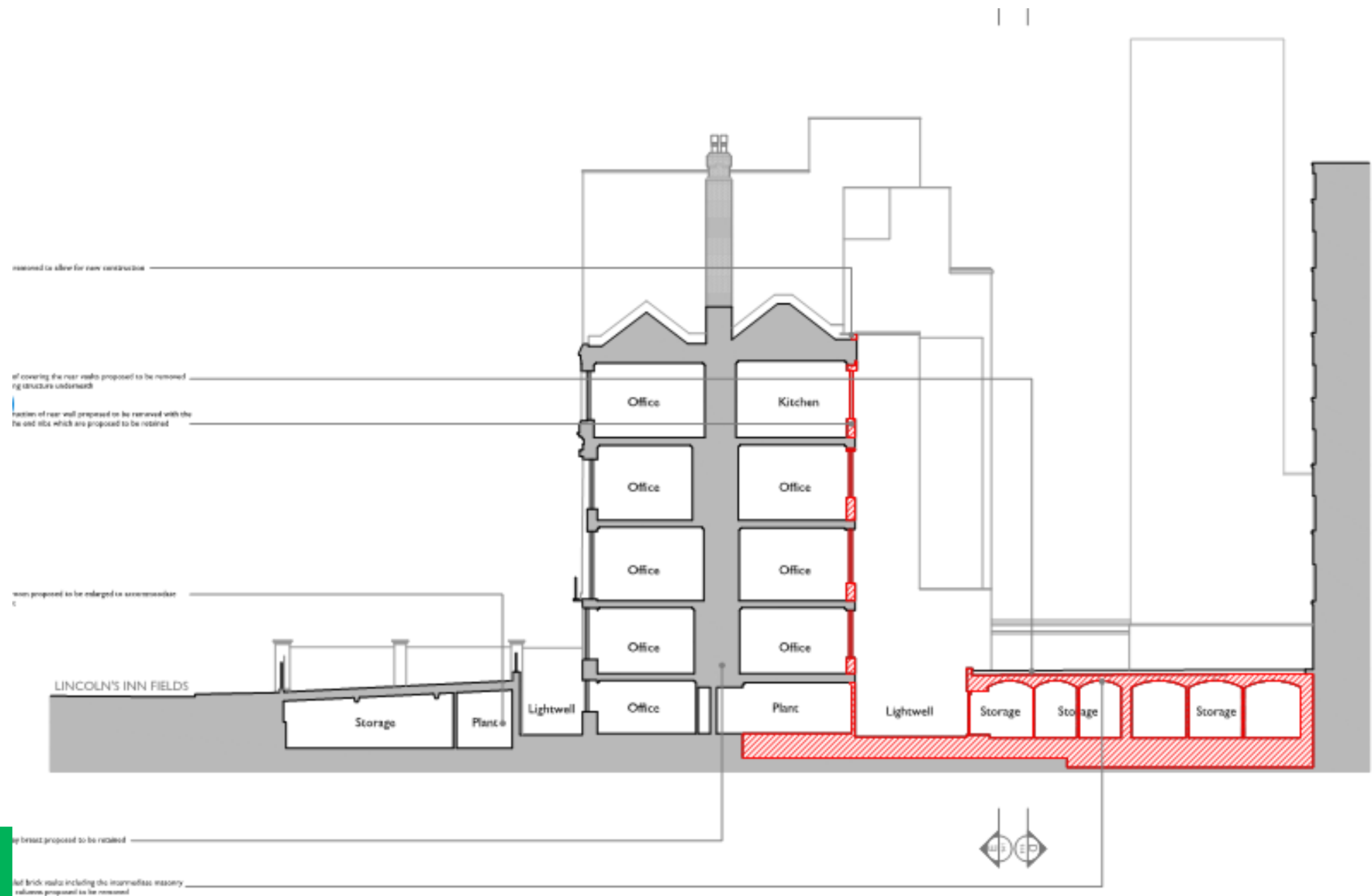
Existing section E



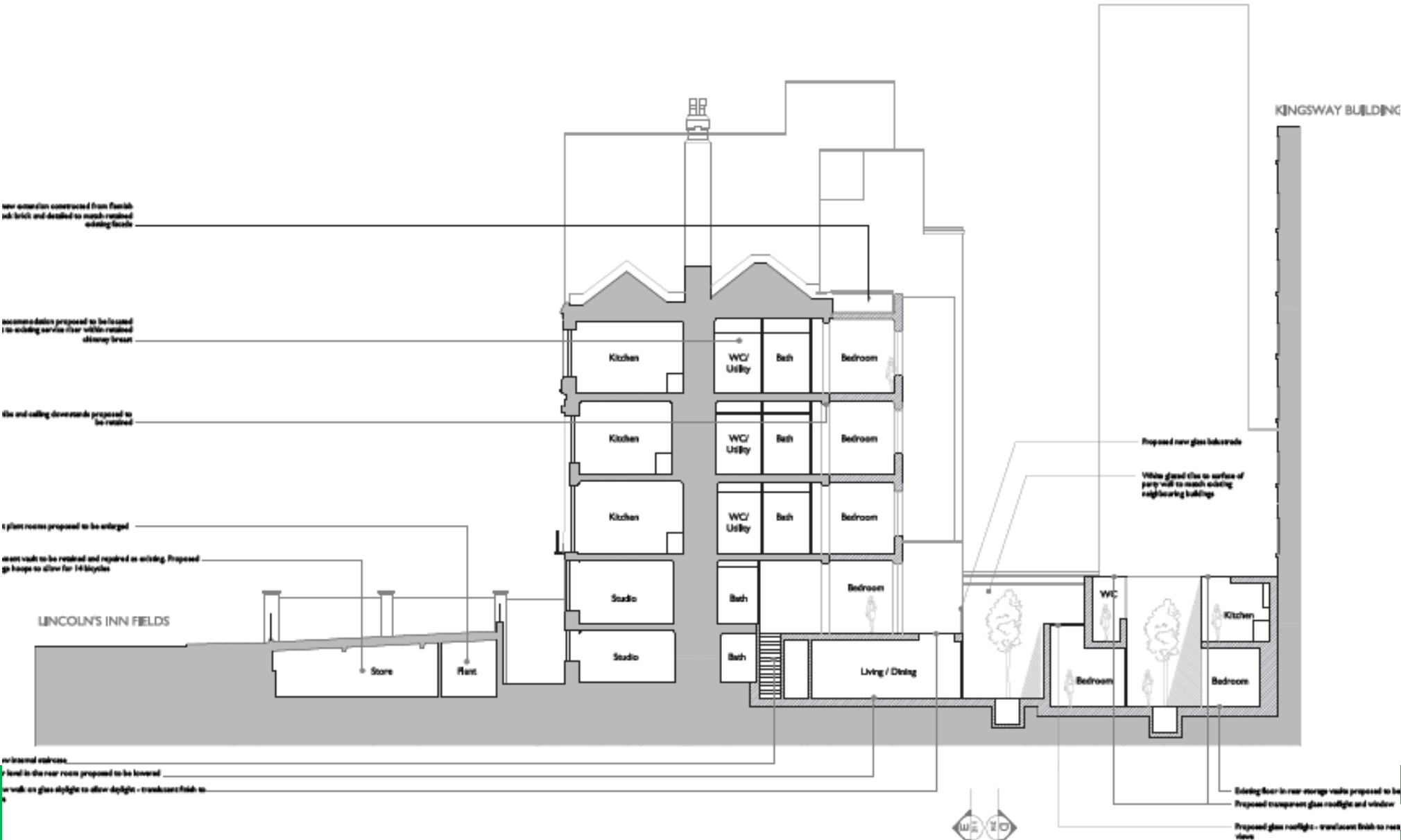
Proposed section E



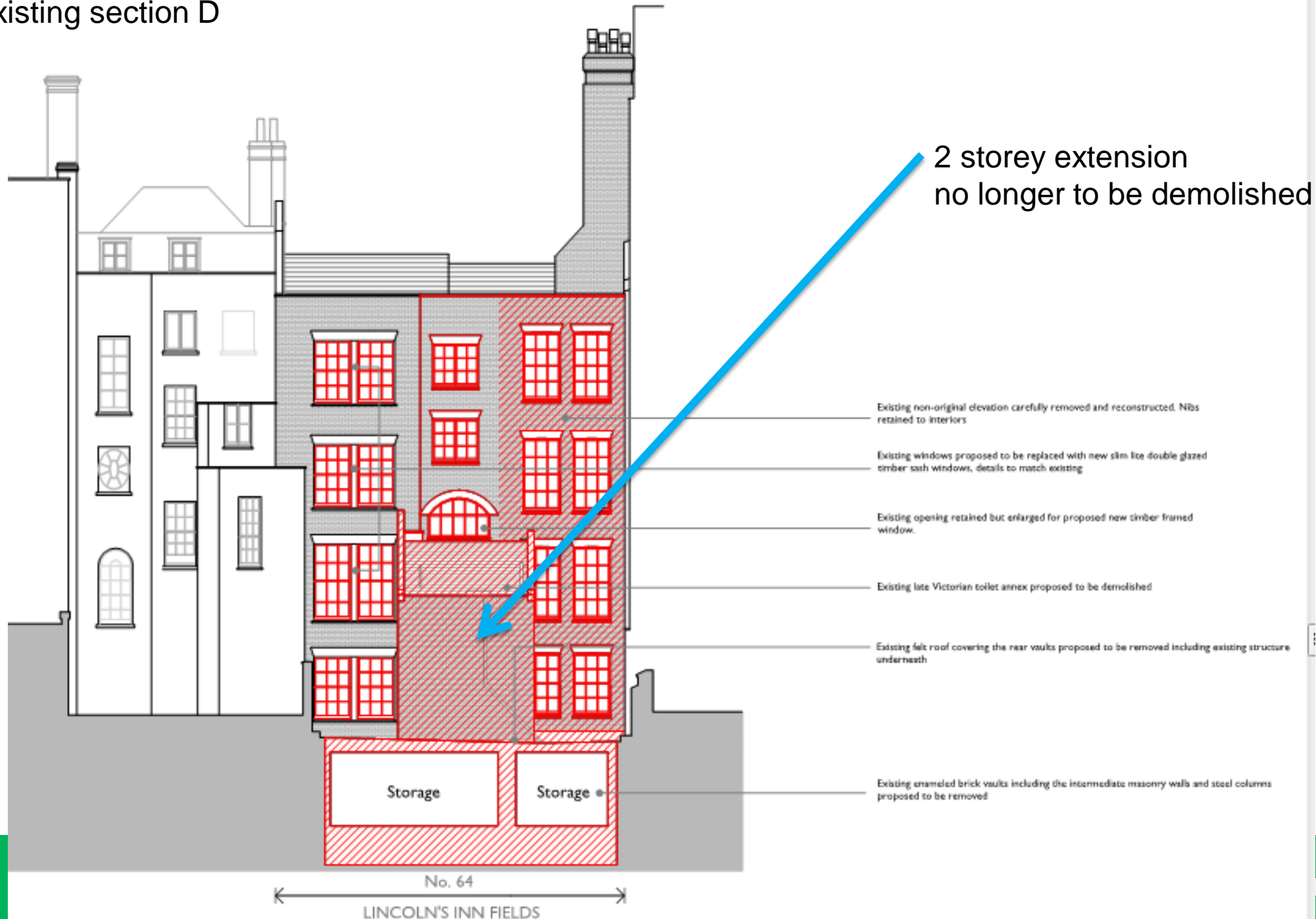
Existing section C



Proposed section C



Existing section D



2 storey extension
no longer to be demolished

Existing non-original elevation carefully removed and reconstructed. Nibs retained to interiors

Existing windows proposed to be replaced with new slim lite double glazed timber sash windows, details to match existing

Existing opening retained but enlarged for proposed new timber framed window.

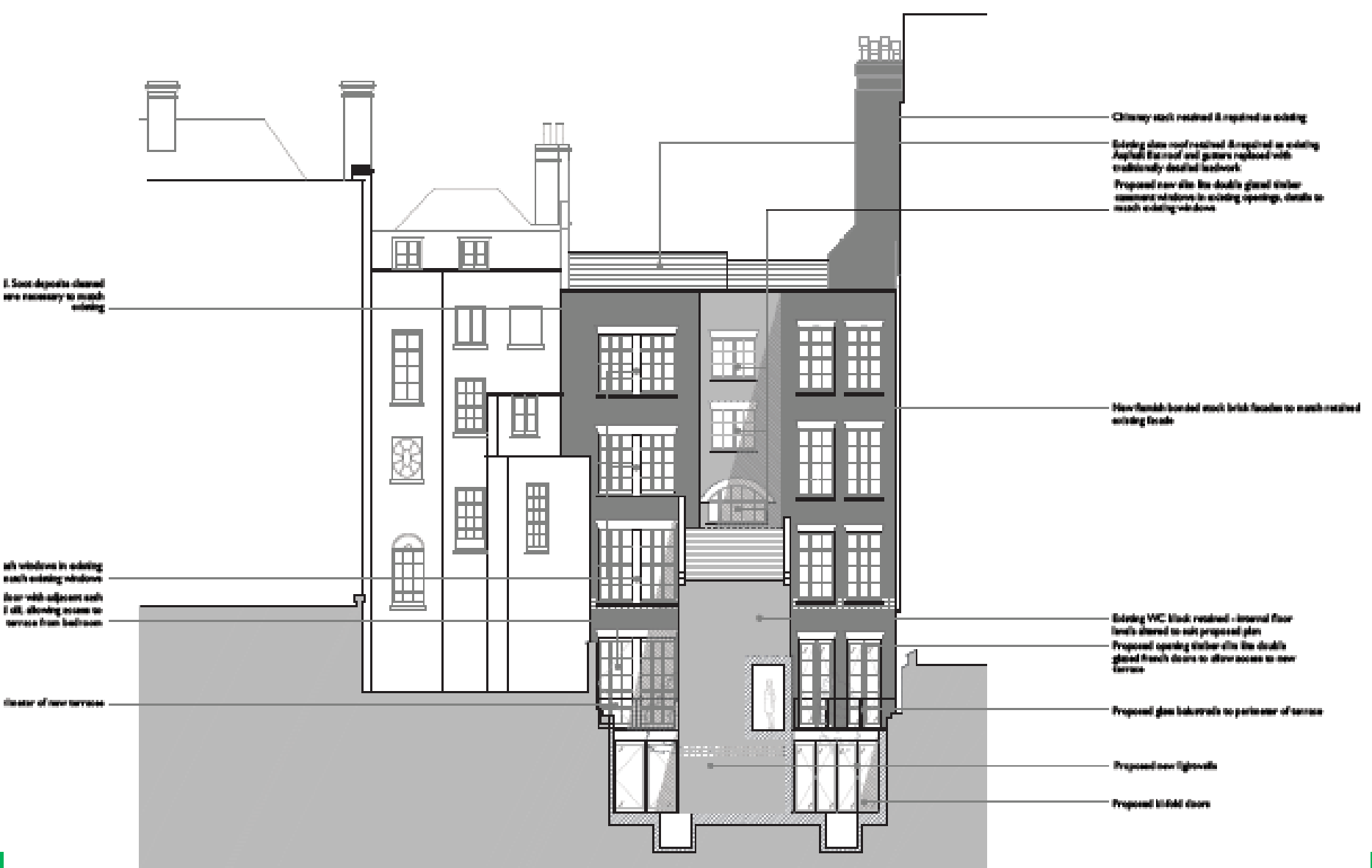
Existing late Victorian toilet annex proposed to be demolished

Existing felt roof covering the rear vaults proposed to be removed including existing structure underneath

Existing enameled brick vaults including the intermediate masonry walls and steel columns proposed to be removed

No. 64
LINCOLN'S INN FIELDS

Proposed section D



If floor deposits cleaned
are necessary to match
existing

all windows in existing
match existing windows
door with adjacent wall
if all, allowing access to
terrace from bedroom

line out of new terraces

Chimney stack retained if required as existing
Existing slate roof retained if required as existing
Asphalt flat roof and gutters replaced with
traditionally detailed leadwork
Proposed new sills for double glazed timber
casement windows in existing openings, details to
match existing windows

New Flemish bonded work brick facade to match retained
existing brick

Existing WC block retained - internal floor
levels altered to suit proposed plan
Proposed opening timber clad fire double
glazed french doors to allow access to new
terrace

Proposed gas balustrade to perimeter of terrace

Proposed new lightwells

Proposed timber doors

No. 64
LINCOLN'S INN FIELDS

Existing street elevation



Proposed street elevation



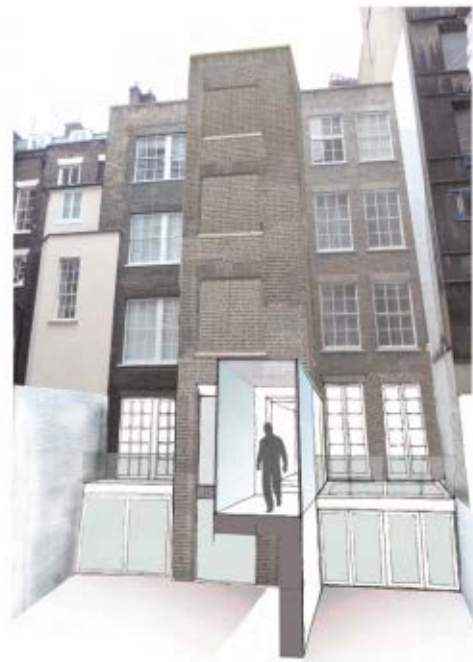
No. 64
LINCOLN'S INN FIELDS

Proposed new decorative metal railing configuration to street elevation to match existing railing height and appearance. Proposed to be central pedestrian gate with gate posts and metal railings fixed either side, least way / rail post integrated into gate post.

Indicative rear elevation



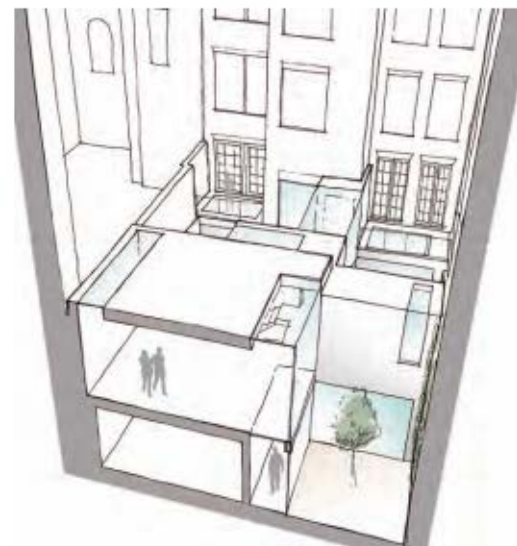
Principle rear elevation as Existing



Principle rear elevation as Proposed



Section through lightwells looking East towards Kingsway buildings



Section through lightwell looking West towards main house



Proposed section through retained staircase, proposed lightwell & rear dwelling house