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Date: 04/09/2017
Our ref: 2017/3418/PRE
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Tom Mellor
Suite 10, Corum 2
Crown Way
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Bristol
BS30 8FJ

By email

Dear Mr Mellor,

Re: Elizabeth House, 4-7 Fulwood Place, WC1V

Thank you for submitting a pre-planning application enquiry for the above property which was received on 19/07/2017 together with the required fee of £974.00.

1. Drawings and documents

17008/200 rev A, 17008/201 rev A, 17008/202 rev A, 17008/203 rev A, 17008/204 rev A, 17008/205 rev A, and cover letter dated 9 June 2017.

Revised drawing no. 17008/205 rev B received 07/08/2017 following pre-application meeting on 21/07/2017.

2. Proposal

Erection of two storey roof extension with plant area to office building, 4 storey rear extension (total 405sqm), opening up of front lightwell to provide access to basement floor, alterations to entrance and rear lightwell.

3. Site description

The application site comprises a 4 storey building with basement floor located on the west side of Fulwood Place, a narrow pedestrian thoroughfare running from High Holborn to Gray's Inn Gardens. It is currently in use as offices (B1a use), as are the majority of the surrounding buildings.

The building is located within three strategic viewing corridors – from Blackheath Point, from Greenwich Park, and from Primrose Hill to St Pauls.

The application building is not listed, nor is it noted as making a positive contribution to the Bloomsbury Conservation Area within which it is located.

4. Relevant planning history

PSX0104003 - The erection of two additional floors for use as offices (Class B1). Granted 18/06/2001.

9000513 - The addition of a two storey roof extension to the existing office building and the extension of the basement enclosure at the rear of the building. Granted 07/02/1991.

32614 - Alterations to the existing entrance. Granted 06/08/1981.

5. Site specific constraints

- Archaeological priority area
- Central London Area
- Bloomsbury Conservation Area
- Strategic view background
- Crossrail 1km buffer area
- TFL Underground zone of interest
- Subterranean (groundwater) flow underground development constraint
- Slope stability underground development constraint

6. Relevant policies and guidance

[National Planning Policy Framework 2012](#)

[The London Plan March 2016](#)

[Camden Local Plan 2017](#)

Policy G1 Delivery and location of growth

Policy A1 Managing the impact of development

Policy A4 Noise and vibration

Policy D1 Design

Policy D2 Heritage

Policy H1 Maximising housing supply

Policy H2 Maximising the supply of self-contained housing from mixed use schemes

Policy H4 Maximising the supply of affordable housing

Policy E1 Economic Development

Policy T1 Prioritising walking, cycling and public transport

Policy T2 Car-free development and limiting the availability of parking

Policy T4 Promoting the sustainable movement of goods and material

[Camden Planning Guidance](#)

CPG1 (Design) 2015

CPG2 (Housing) 2016

CPG6 (Amenity) 2011
 CPG7 (Transport) 2011
 CPG8 (Planning obligations) 2015

7. Assessment

The principle planning considerations are considered to be the following:

- Land use.
- Design (the impact of the proposal on the character and appearance of the host building and wider Bloomsbury Conservation Area).
- Amenity (the impact that the proposal may have on the amenity of neighbouring properties in terms of outlook, daylight, privacy and noise).
- The impact of the proposal on the local transport infrastructure.

8. Land Use

The Council will require a mix of uses within development where appropriate, including a contribution towards the supply of housing, in order to facilitate sustainable development and reduce the need to travel between homes, services and jobs. Policy H2 applies to all proposals for new build non-residential development and extensions involving a significant floorspace increase. It specifically seeks provision of self-contained houses and flats (Use Class C3), rather than other forms of housing, in line with the priority land-use of the Plan as set out in "Policy H1 Maximising housing supply".

In the Central London Area where more than 200 sqm (gross) additional floorspace is provided, we will require up to 50% of all additional floorspace to be self-contained housing, subject to the following considerations:

- a. the character of the development, the site and the area;
- b. site size, and any constraints on developing the site for a mix of uses;
- c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
- e. whether the development is publicly funded or serves a public purpose.

Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, the Council will take into account criteria (a) to (e) and the following additional criteria:

- f. the need to add to community safety by providing an active street frontage and natural surveillance;

- g. the extent of any additional floorspace needed for an existing user;
- h. the impact of a mix of uses on the efficiency and overall quantum of development;
- i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

In this instance, the development would result in an increase in floorspace of approximately 400sqm and would therefore trigger the requirement to provide 200sqm of self-contained housing on site. The pre-application proposals involve the creation of additional office floorspace only, and therefore would be contrary to policy H2.

If it is not practical to provide this housing contribution on site, it would need to be thoroughly justified as part of the formal planning application. For instance, the residential use may conflict with the existing office use within this building, and there would be no secondary access core available for the residential units.

Exceptionally, where provision of housing is required, on-site and off-site options have been thoroughly explored and it is demonstrated to the Council's satisfaction that no appropriate site is available for housing, we may accept a payment in lieu of provision, fairly and reasonably related in scale and kind to the development proposed and secured by a planning obligation. In this instance, based on a total uplift of 400sqm, the Council would seek to secure a contribution of £140,000 (200sqm x £700).

9. Design

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. Camden's Development Policies Document is supported by CPG1 (Design) and CPG6 (Amenity), as well as the Bloomsbury Conservation Area Statement.

Context

Fulwood Place, is a narrow pedestrian route running between Gray's Inn and High Holborn. Buildings on Fulwood Place are varied in materials and appearance. The existing building is four storeys tall and finished in white render, dating from the 1950s when it was constructed following bomb damage. Other buildings in close proximity are of similar heights and proportions and are either finished in brick or render. Some have received one and two storey roof extensions; all of varying design and materials – some more prominent than others.

The site is within Bloomsbury Conservation Area and to the north sits Gray's Inn, the Inns of Court and a registered Grade II* park and garden, which also contains numerous listed

buildings. There are glimpses of Fulwood Place and the buildings upon it from the south end of Gray's Inn.

At roof level, adjacent to the north sits a single storey roof top extension which sits back from the parapet. Beyond that is a large two storey flank wall, and to the south is a large two storey flank wall.

Roof extension

Following previous approvals for a two storey extension, assessment of the current scheme and an onsite assessment, the principle of extending by two storeys at roof level is considered acceptable, subject to minor revisions to the massing and detailed design.

It is considered that by setting back each storey on different planes (setting the first storey back from the existing façade) would be more acceptable and would help to reduce the overall impact of the additional height and bulk (as seen in the amended proposals).

The overall detailing is integral to a successful scheme, in terms of materials and design – this requires further information and demonstration that it can sit sensitively on top of the host building but also within its context. Views/photomontages will need to be provided to assess the impact from the registered park and garden, as well as from views up and down Fulwood Place. Similarly, details of the flank elevation to the north side will be integral as this will be visible from the north of Fulwood Place and beyond.

The amended proposal shows tall narrow windows on the 5th storey elevation. Although these follow similar proportions to those below, they do look slightly uncomfortable and additional detailing would need to be provided to be convinced on this; especially with it being positioned so close to the front elevation. Sample or further information of the cladding will need to be provided before further comments can be made.

The lightweight appearance of the glazed top storey could be acceptable subject to its detail, and how it joins the lower storey, the side elevation, and the flank walls of the adjacent properties. Balustrade detailing will also need to be provided, and further views to show whether the rooftop plant would be visible.

Rear extension

The elevation drawings submitted with the pre-application proposals show a new 5 storey rear extension from ground floor to 4th floor to provide new WCs on each floor; however, this is not shown on a section drawing. It is difficult to determine the impact of this without clear drawings showing the wider context, and it is recommended that CGI's are submitted with the full application to appreciate the impact on the existing and surrounding buildings in terms of design and balance.

External ground floor front alterations

Other properties here have balustrading around lightwells and as such, the principle is supported; however, further detail is required for the steps, materials and balustrade. The

opening up of the front lightwell does not involve any additional excavation and therefore would not require a basement impact assessment.

If new windows are proposed to the front elevation, details of these are also required, and should be seen as an enhancement.

The following information should be submitted with the full application/secured via condition:

- Heritage Impact Assessment (can be included within D&A) to include assessment of views in/out of conservation area.
- Samples and information about all new materials.
- Manufacturer's specifications and details of new windows/doors (at a scale of 1:10, 1:1 etc.)
- Details of the plant screen.
- Balustrade detail.

10. Amenity

Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered and would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise, daylight and sunlight.

The Council's records suggest the nearest residential properties are at Fairfax House on the opposite site of Fulwood Place and flats at 7 and 8 Warwick Court to the north west. Limited assessment of the impact of the roof extension on these properties has been provided with the pre-application submission. Although it is unlikely that the development would harm neighbouring privacy or outlook, a daylight assessment should be submitted with any future planning application to demonstrate that the increased height at this level wouldn't result in unacceptable harm to neighbouring daylight.

Replacement/Installation of plant

Development involving the installation, alteration or replacement of plant, ventilation, extraction or air conditioning equipment, will require a noise, vibration and ventilation assessment to be submitted with your planning application. This should include the following information:

- existing background noise levels measured over a 24-hour period (including the cumulative noise levels of all existing units)
- proposed background noise levels (including the cumulative noise levels of all proposed units)
- any proposed measures to reduce noise, fume emissions and vibration
- the system manufacturers specification of the proposed equipment to be installed, altered or replaced
- details of the method used to compile the report and examples of the calculations and assumptions made.

The noise impact assessment must demonstrate that the new plant would comply with Camden's noise standards (policy A4) which state that the external noise level emitted from plant, machinery or equipment shall be lower than the lowest existing background noise level

by at least 5dBA, or by 10dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises (with all machinery operating together at maximum capacity).

If this is not achievable, then the Council would expect suitable noise attenuation measures to reduce the noise levels of the proposed plant. Details of any necessary mitigation measures should also be supplied with the full planning application.

11. Transport

Management of Construction Impacts on the Public Highway in the local area

The application site is highly constrained, and surrounded by other buildings. The Council's primary concern is public safety but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion. There are a number of sites within close proximity to the site which must be considered in order to reduce cumulative impacts.

The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A Construction Management Plan (CMP) is therefore likely to be required and secured as a Section 106 planning obligation.

The Council has a CMP pro-forma which must be used once a Principal Contractor has been appointed. The CMP, in the form of the pro-forma, would need to be approved by the Council prior to any works commencing on site. The CMP pro-forma is available on the Camden website here.

A financial contribution would need to be secured to cover the costs of reviewing the Construction Management Plan (these fees are under review and will be confirmed at application stage). This would also need to be secured by a Section 106 planning obligation if planning permission is granted.

Some highway licences may be required to facilitate the proposed works. You would need to obtain such highway licences from the Council prior to commencing work on site. Any such licence requirements should be discussed in the CMP. Details for the highway licences mentioned above are available on the Camden website here.

12. Conclusion

In general the principle of the proposals can be accepted; however, further detail is required to ensure a convincing and quality design which incorporates sensitive materials and detailing. The proposal should preserve or enhance the character, appearance and setting of the Bloomsbury Conservation Area.

13. Planning application information

If you submit a planning application which addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – Full planning
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and access statement
- Noise Impact Assessment
- Sample photographs/manufacturer details of proposed materials
- The appropriate fee of £2,310.
- Detailed drawings/information listed in section 9.
- Completed CMP Pro-forma
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a site notice on or near the site and, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Laura Hazelton on the number above.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Laura Hazelton

Planning Officer
Planning Solutions Team

