



**Date: 07/12/2017**  
**Our ref: 2017/4978/PRE**  
**Contact: John Diver**  
**Direct line: 020 7974 6368**  
**Email: [john.diver@camden.gov.uk](mailto:john.diver@camden.gov.uk)**

**Planning Solutions Team**  
**Planning and Regeneration**  
Culture & Environment  
Directorate  
London Borough of Camden  
2<sup>nd</sup> Floor  
5 Pancras Square  
London  
N1C 4AG

Holly Mitchell  
15 Buckingham Gate  
London  
SW1E 6LB

[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

*By email*

Dear Holly,

**Re: 28 Fitzroy Square, London, W1T 6DD**

Thank you for submitting a pre-planning application enquiry for the above property, which was received on 04/09/2017 together with the required fee. These notes were informed via a visit to the property with planning and conservation officers on the 27/09/2017.

During the site visit, officers relayed a number of concerns in relation to the extent of the development proposed and verbally advised that works were unlikely to be supported by virtue of the resulting harm caused to the listed building. As a result, it was requested that a revised set be prepared and issued for comment. The revised set of plans were submitted for comment on the 06/11/2017. The following report is based upon this revised set of plans.

## **1. Drawings and documents**

- 1.1. The following documentation was submitted in support of the pre-application request:
- Existing, demolition and proposed elevations and floor plans;
  - 3D views of the existing and proposed extension;
  - Heritage Statement by Heritage Collective containing photographs of the existing site; and
  - A covering letter setting out design and access principles and general planning considerations behind the proposal

## **2. Proposal**

- 2.1. Advice is requested in relation to the following proposed developments:  
*'Extensions to rear of G11\* listed property at ground floor level; excavation to front lightwell to provide damp proofing and storage; internal alterations from basement to third floor levels; and installation of new AC plant all in association with the continued use of the building as an office (B1a)'*

2.2. The proposed development would not include any changes of use. The proposed works are sought in order to reconfigure the building for modern office use.

### 3. Site description

3.1. The application site is a Grade II\* listed, four storey (plus basement) former townhouse located on the west side of Fitzroy Square, W1T (list entry no. 1112996). The property sits within a terrace of 13 houses (nos.20-32) forming the western side of Fitzroy Square and dates to the 1830s. The application site is also located within the Fitzroy Square Conservation Area.

3.2. There are no trees protected by tree preservation orders on or adjacent to the application site. As outlined in the history section below, the property's lawful use is for office purposes (Use Class B1a).

### 4. Relevant planning history

4.1. The following planning history is relevant to this site:

#### No.28 (Application Site)

**8970047:** Listed building consent was granted on the 14/06/1989 for the *'Alterations to basement involving relocation and addition of lavatories alterations to partitions installation of new ceilings and services and redecoration'*

**8770104:** Listed building consent was granted on the 20/05/1987 for *'Works of repairs and maintenance and minor alterations at 3rd floor level'*

**TP52752/25/09/61:** Planning permission was granted on the 27/10/1961 for the *'The use of 28 Fitzroy Square as Embassy Offices on the basement, ground and first floors, and as a residential maisonette on the second and third floors'*

**TP52752/12494:** Planning permission was refused on the 28/10/1955 for the *'use of the third floor of No. 28, Fitzroy Square, St. Pancras, for office purposes'*

*Reason for refusal:*

- 1) *Such use does not accord with the Council's Development Plan in this area is allocated for residential use, and that the third floor of these premises is suitable for residential occupation and should continue to be so used.*

**TP52752/8528:** Planning permission was granted on the 09/09/1955 for the *'erection of an addition at first floor level at the rear of No. 28, Fitzroy Square and roofing over of the basement yard in connection with the use of the basement, ground, first and second floors as offices by the National Spastics Society'*

#### Other relevant planning history within terrace (nos.20-32)

##### No.26

**2016/1779/P & 2016/2501/L:** Planning permission and listed building consent were granted on the 05/08/2016 for the ‘*Change of use between 2nd and 4th floors from office (B1) and ancillary residential accommodation to form 2x residential units: 1bed at second and 2bed at third and fourth floors including replacement three storey rear extension and associated alterations.*’

No.27

**2014/3044/P & 2014/3078/L:** Planning permission and listed building consent were granted on the 14/07/2014 for the ‘*Erection of a single storey ground floor rear infill extension, new door opening in existing ground floor rear extension, new skylight in rear courtyard and alterations and additions to the front lightwell.*’

Nos.29-30

**15438(R):** Planning permission was granted on the 04/01/1973 for the ‘*Erection of a rear extension on basement, ground and 1<sup>st</sup> floors and installation of new lift*’

## 5. Relevant policies and guidance

- [National Planning Policy Framework \(2012\)](#)
- [London Plan \(2016\)](#)
- [LB Camden Local Plan \(2017\)](#)
  - G1 Delivery and location of growth
  - C5 Safety and security
  - C6 Access for all
  - E1 Promoting a successful and inclusive Camden economy
  - E2 Employment premises and sites
  - A1 Managing the impact of development
  - A4 Noise and vibration
  - A5 Basements and Lightwells
  - D1 Design
  - D2 Heritage
  - CC1 Climate change mitigation
  - CC2 Adapting to climate change
  - CC3 Water and flooding
- [Supplementary Guidance](#)
  - CPG 1 – Design
  - CPG 4 – Basements and lightwells
  - CPG 6 – Amenity
  - CPG 7 – Transport
  - CPG 8 – Planning Obligations
- [Fitzroy Square conservation area appraisal and management strategy \(2010\)](#)
- [Historic England Guidance: London Terrace Houses 1660-1860 \(1996\)](#)

## 6. Assessment

6.1. The proposed development would not involve any changes of use or sub-division. The main issues to consider in this case are therefore as follows:

- Design and heritage (section 7);
- Impact on the amenity of adjoining occupiers (section 8);
- Basement construction (section 9);
- Transport and Planning Obligations (section 10).

## 7. Design and heritage

### Local policy context

7.1. The Council's design policies are aimed at achieving the highest standard of design in all developments. The following considerations contained within policy D1 are relevant to the application: development should respect local context and character; comprise details and materials that are of high quality and complement the local character; and respond to natural features. Policy D2 'Heritage' states that to preserve or enhance the borough's listed buildings, the Council will resist development involving substantial demolition, alterations or extensions where this would cause harm to the special architectural and historic interest of the building; and resist development that would cause harm to the setting of a listed building. Policy D2 also states that in order to maintain the character of Camden's conservation areas, the Council will not permit development within conservation area that fails to preserve or enhance the character and appearance of that conservation area.

7.2. The Council's design guidance (CPG1) states that when assessing proposals involving listed buildings, we will consider the impact of proposals on the historic significance of the building, including its features, such as:

- original and historic materials and architectural features;
- original layout of rooms;
- structural integrity; and
- character and appearance (para 3.22)

7.3. The CGP continues to state that the Council would expect original or historic features to be retained and repairs to be in matching materials; and that proposals should seek to respond to the special historic and architectural constraints of the listed building, rather than significantly change them (para 3.23).

7.4. The Fitzroy Square conservation area appraisal and management strategy (FSqCAMS) (2010) describes Fitzroy Square as "*The principal focal point of the area..., planned in the latter quarter of the 18th century as the centrepiece for Charles Fitzroy's speculative development*". The Western (within which no.28 sits) and Northern terraces, being slightly later than the GI listed Southern and Eastern terraces are "*of the same scale and share similar common details [with the GI listed properties on N/W terraces] such as the rusticated ground floor, arched ground floor openings and decorative railings at first floor level*".

### Special character of GII\* property

7.5. The listing description of nos.20-32 (list entry no.1112996) describes the GII\* listed terrace as follows:

*“Terrace of 13 houses forming the western side of Fitzroy Square. c1832-35. Stucco with rusticated ground floor. EXTERIOR: 4 storeys and basements. 3 windows each. 3 windows at each end and centre 7 windows projecting. Round-arched ground floor openings linked by impost bands. Doorways with pilaster-jambs carrying cornice-heads; fanlights (some radial patterned) and panelled doors. Sash windows in shallow, plain stucco recesses. Upper storeys with square-headed, recessed sashes. Continuous cast-iron balcony to 1st floor windows. Moulded 2nd floor sill band. Main cornice with plain frieze below attic storey. Cornice and blocking course. Central bays with 4 Ionic engaged columns in antis rising through 1st and 2nd floors. 1 bay to either side with pilasters rising through 1st and 2nd floors and recessed, tripartite sash windows, those on the ground floor being segmental-arched. No.32 with 3 window (all blind) return to Grafton Way”.*

7.6. Further to the above, Georgian London terraced houses comprise certain aspects common to all that make up their special interest. The degree to which these survive is an indication of their significance. These generally include (in no particular order);

- The architectural composition of the terrace facades;
- The detailed architectural treatment of the elevations including proportions, character, craftsmanship and roof form;
- The plan form of the interior – generally 2 rooms (front and back) per floor with the principal rooms located on the ground and first floors and stair compartment rising vertically within the back half of the house;
- The detailed architectural treatment of the interiors including mouldings and decorative features which relate to the hierarchy and architectural vocabulary throughout the house;
- Structural integrity and fabric –timber frame supported on load bearing masonry brick walls with load bearing central timber partition to support the roof (and joists if necessary dependent on size of house and direction of the joists) and lath and plaster walls and ceilings.

7.7. The assessment of the proposed scheme have been informed by the extent to which these element exist at the site and having regard to national and local policies including Historic England guidance on London terrace townhouses.

7.8. No. 28 Fitzroy the building is largely intact with regards to plan form and features one would expect for the building type of this era and forms a part of an important composition of terrace and square. The heritage statement confirms that *“internally the plan form remains in good condition, with the property displaying a typical room arrangement for a building of its type and age”* (paragraph 41) and goes on to say, inter alia that *“numerous decorative features also remain, though a number of modern alterations have resulted in the loss of some of these features”*.

7.9. The heritage statement confirms at paragraph 36 that *“The key alteration to the building has been the infilling of the rear courtyard and its subsequent upward extension at first floor to provide the current arrangement”*. The Council would agree that this is a key alteration to the original form of the property and would not like to see

the situation worsen with a view to preserving the buildings special interest in line with Section 16 of the Planning ( Listed building and conservation area Act 1990).

- 7.10. The main issues to consider therefore are the impact of the proposed internal layout changes; impact on the new a/c servicing; and the infilling of the rear courtyard.

External alterations (rear extensions)

- 7.11. It was noted on site that the property benefits from an existing full width and depth lower ground extension as well as half width rear extensions at ground and first floor levels for the full depth of the rear lightwell/original courtyard. The revised scheme issued for comment would propose the infilling of this rear courtyard at ground floor level with a full width extension at this level, occupying the entirety of the rear courtyard save for a retained lightwell with a depth of 1.5m and width of 3m.
- 7.12. Historic England's guidance note on London Terrace Houses advises that for rear extensions to period townhouses, "*full width extensions should not usually be allowed, except in some cases at basement level*" and that "*proposals for adjacent infill [to any historic rear extension/closest wing]... will normally be resisted*" (pg.13). This guidance remains in accordance with the Council's adopted CPG1 (Design) as well as the FSqCAMS (2010).
- 7.13. Having reviewed the revised scheme, a view is maintained by officers that the proposed additional rear infill extension would act to compromise what remains of the courtyard space and would detrimentally impact upon views from and the character of the rear room at ground floor level. The surviving external area retains its original overall proportions and enables the house's historic relationship to its yard to be read from inside the house, while allowing appreciation of the rear elevation of the house from the outside. Furthermore, the substantial level of enclosure proposed will change the character of the ground-floor room making it far more enclosed, reducing levels of natural light and rear aspect and so harming its special interest.
- 7.14. These impacts are considered to be exacerbated by the proposed parapet to the opposing elevation, which would act to conceal to the AC condenser units to the flat roof of the GF extension. Officers also note that this GF extension would additionally result in the loss of historic fenestration and brickwork from the extension that appears to form part of the original construction.

*Local precedent*

- 7.15. During both the site visit as well as in subsequent correspondence, attention has been drawn to the other existing extensions and alterations to other properties within the row. Submitted statements refer to a number of recent decisions and suggest that the precedent set by these decisions should override the above concerns. As such officers have paid due attention to the relevant planning history outlined in section 4.
- 7.16. Within the application row, the adjacent properties at nos. 26, 27 and 29-30 all feature rear extensions/additions of varying forms. No.29-30 features a full width (across both properties save a small retained central lightwell) rear extension at basement – first floor levels. This extension was granted permission in the early 70's

(ref. 15438(R)) and is considered to have caused significant harm to the interest of these adjacent listed properties. This decision was made outside of the current planning policy framework and it was agreed that these alterations would be given very limited weight in any future formal assessment.

7.17. Rear extensions/alterations have however been granted much more recently at nos.27 and 26 and are both examples which would be given some weight in the decision making process for any subsequent application.

7.18. No. 26 is the most recent (2016) and was successfully negotiated as a replacement two storey (above basement) part width extension which retained the pre-existing courtyard at ground floor level. Rather than an extension which infilled more of the ground floor courtyard which was originally proposed, officers advised that such works would be unacceptable during the application process and reduced and revised drawings were submitted and subsequently approved (with works now substantially completed onsite). Although this approval included an element at 1<sup>st</sup> floor level, the approval granted the replacement for an existing volume only and did not include substantial increase to the bulk/mass at the rear.

7.19. The most recent approval at No. 27 (2014) did allow for the infill of the courtyard at ground floor level in a similar manner to the current proposal. The Council is citing the former as an example of what it would like to see on the site (eg no further development at the rear) because of the harm which would be caused to the principal ground floor level through the proposed infilling. Submitted statements have understandably used the latter as a precedent for accepting the proposed works.

7.20. The main issue at play here is about the acceptability of infilling to the rear courtyard and how this would impact the special interest of the listed building. Each site (nos.26-28) is slightly different but there is a consistent volume/level of infill which has been allowed across each of the sites. The Council has allowed the same amount of infill across each of the adjacent buildings by allowing *either*:

- infilling of the courtyard at ground floor level (above basement); OR
- a two storey (above basement) part width infill extension (Refer to fig 1 below).

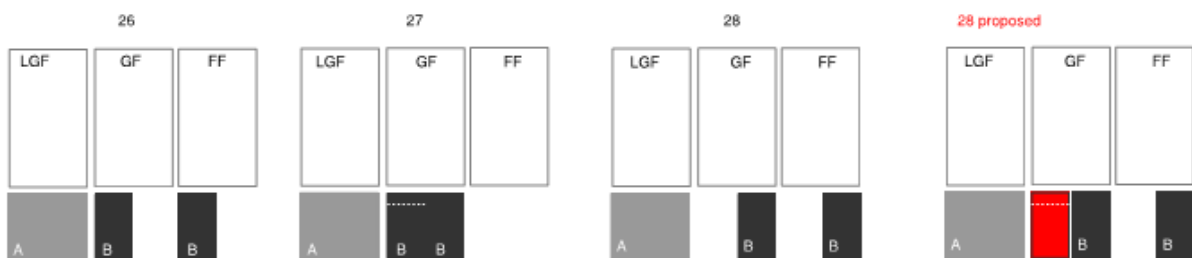


Figure 1: Diagram showing level of rear development as existing and proposed at nos.26-28

7.21. The retention of the first floor part width extension at no. 28 as well as a full width extension at ground floor level would result in more rear infilling than has been allowed on either of the adjoining properties (nos.26/27). As such no direct comparison can be drawn with the scheme hereby proposed and that previously approved to nos.26/27 and it is still considered that the extensions proposed would

unduly overwhelm the courtyard and appreciation from the rear rooms of the building. The Council is being consistent in its decision making process in this regard allowing a similar level of infill across each of the sites and as such retain the objection raised to further infilling at the rear of the site.

### Internal alterations

#### *Lower ground floor level*

- 7.22. Considering the existing condition and level of alterations made to the property at this level, no significant concern is raised with regard to the alterations proposed within the main property at this level. In order to avoid any unnecessary disturbance to the fabric at ground floor level it would be recommended however that the pipe routes for the ground floor front and rear rooms should be run within a suspended ceiling at this level.
- 7.23. The reduction in depth of the front vaults by 0.5m would not be objectionable in this instance, subject to the confirmation that such excavation would not harm the surrounding physical environment (as discussed in section 9). It should be noted though that if the existing vaults have not already been damp proofed, this would be expected using a physical barrier system (newton 500 or similar).

#### *Ground floor level*

- 7.24. Other than those rear extensions previously discussed, revised plans indicate alterations at GF level including the sub-division of the front room with a glass screen with plaster down stand as well as a number of routes for servicing.
- 7.25. This proposed subdivision of the front room is considered to unduly affect the historic layout, plan form and character of this room and to unsympathetically abut the chimneybreast of this room. As outlined in the aforementioned HE guidance note, *“the domestic plan form of London terrace houses is an important part of their character and special interest. As a general rule the character, proportion, and integrity of the principal rooms at ground and first floors, together with the primary and secondary staircase compartments should be preserved. Normally, such areas should not be subdivided”* (pg.11). Considering that the original plan form of the property included a small rear room, it is strongly recommended that the scheme is amended to work with the existing layout and use the rear room as the D.W. office.
- 7.26. In terms of the proposed service runs, as discussed in the last section it is advised that were these are run through from basement level below to limit the level of intervention into historic fabric.

#### *First floor level*

- 7.27. At first floor level, only minimum alterations are now proposed. The main issue for concern at this level would involve the routing for the proposed services/piping and the impacts that this might in terms of the existing historic fabric at this level. For instance, routing the main pipe work from the rear extension to the central riser at this level is considered likely to have a significant and detrimental on the fabric if historic joists



exists at this level. Moreover routing from the central riser to the wall mounted units will also result in undue notching to the joists where they would span across. There is also a more general concern with regards to the vertical risers proposed (distribution/electrical and ac), however, these manifest themselves within the spaces.

- 7.28. Overall it is suggested that new routes should be found to avoid unnecessary lengthy runs against the joists direction and avoid cutting the likely main bressemer around the spine wall by repositioning the wall mounted units more sympathetically. For the VRF vertical riser, it would also be important to demonstrate how this could be concealed from view at first floor level and not interfere with the historic cornice.
- 7.29. Finally, it should be noted that the fire surrounds on this floor are considered to be of historic value and should be retained.

#### *Second floor level*

- 7.30. At second floor level some further opening up is proposed between the front and rear rooms, as well as between the front room and the proposed manager's office. Whilst the opening up of the manager's office (with retained nibs) would not be objectionable, it is advised that the spine wall should be largely retained to protect the historic plan form with only a small central opening formed. This would have the added advantage of concealing the VRF riser in the retained cupboard.
- 7.31. As discussed above, concern is equally maintained at this floor in terms of the proposed routing for the services and the impacts that this might cause in terms of historic fabric.

#### *Third floor level*

- 7.32. The proposals at third floor level would be similar to those proposed at 2<sup>nd</sup> floor level and as such the above comments also stand.
- 7.33. Equally creating an open plan layout within the mansard is considered harmful to the hierarchy of spaces through the building. The layout of multiple smaller rooms is a characteristic of the attic spaces of former domestic properties and there is value in retaining these the partitions here rather than just the appreciation of the layout through retained nibs. The Council would therefore expect smaller openings between the rooms only in this respect and not at the scale of opening currently shown on plans. Please note however, that officers are currently unclear as to the age of the mansard. If it can be demonstrated the mansard of more modern insertion to the building/terrace then it is unlikely to be as important to retain the current layout plan.

#### Design and heritage conclusion

- 7.34. As outlined in the above sections, the proposed works are overall considered to result in harm to the grade II\* listed building, its setting and its features of special architectural / historic interest. In particular, the elements of the proposed scheme which are viewed as contributing to this harm would primarily include the proposed rear extension, the loss of historic plan form (openings created and partitions installed)

at ground – third floor levels as well as the resulting loss of historic fabric as a result of these works.

7.35. Recent case law dictates that any harm to the heritage asset should be given great weight and importance. Notwithstanding this, paragraph 134 for the NPPF states that *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use”*. In this instance, the only public benefit derived from the scheme would be some minor increase in employment space (Use Class B1(a)).

7.36. Considering that No. 28 Fitzroy remains largely intact with regard plan form and features and forms a part of an important composition of terrace and square, this small increase in office floorspace is not considered to outweigh the harm identified to the significance of the grade II\* listed building. For this reason the proposed scheme is unlikely to be supported by officers in its current form.

## **8. Neighbouring Amenity**

8.1. Policy A1 seeks to protect the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of residents. This includes factors such as privacy, outlook, implications to natural light, artificial light spill, odour and fumes as well as impacts caused from the construction phase of development. Policy A4 seeks to ensure that residents are not adversely impacts upon by virtue of noise or vibrations.

8.2. Due to the level of development previously undertaken to all adjoining sites, the proposed rear extensions would not result in any loss of light or outlook to any adjoining property. It is noted that the flat roof to the GF infill would likely be used as a terrace for employees of the office. At this level the use of this space is unlikely to result in privacy or noise issues considering its enclosed siting.

8.3. It should be noted, however, that the Council would object to the installation of additional plant equipment unless it was clearly demonstrated that such equipment would not result in issues from noise and disturbance. In line with policy A4, a Noise Impact Assessment would be expected upfront alongside any formal application which would need to need to have regard to Camden’s Noise and Vibration Thresholds (Local Plan Appendix 3).

## **9. Basement construction**

9.1. The Councils Basement policy (A5 - adopted July 2017) includes a number of stipulations for proposed basement developments within the Borough. These include upper limits to the acceptable proportions of proposed basement extensions in comparison to the original dwelling (paras.(f) – (m)), but also the express requirement for applicants to demonstrate that the excavations/works proposed would not result in harm to:

- a. neighbouring properties;

- b. the structural, ground, or water conditions of the area;
- c. the character and amenity of the area;
- d. the architectural character of the building; and
- e. the significance of heritage assets

9.2. Parts (n) – (u) of this policy continue to expand upon this requirement and together, set the parameters for the assessment of proposed basement development. These parameters are expanded upon with CPG4 (Basements). The Council will only permit basement development where it has been satisfactorily demonstrated that the works would accord with these criteria.

9.3. Submitted drawings indicate that the proposal would include some excavations to the front basement vaults in order to convert these into usable spaces. In light of the above newly adopted policy, the Council expects any proposal including excavation works to be accompanied by a Basement Impact Assessment to evidence the potential impacts caused by such works. If only a depth of 0.5m would be proposed, it is likely that such a BIA would not need to go beyond the 'screening' stage outlined in CPG4. Considering the sensitivities of the surrounding historic fabric and aforementioned requirements for damp-proofing, particular concern would however be raised within regard to the structural implications of such excavations and as such the BIA would be a validation requirement were this element pursued.

## **10. Transport / Planning Obligations**

10.1. The proposed development would not include any changes of use but would involve some addition of office floor space within the property. In line with London Plan and Local Plan (T1) policies, new office floorspace is usually expected to be accompanied by adequate, step-free cycle parking to service the increased trip creation. In this instance, however, there would be limited scope for the installation of cycle parking at street level in a manner which would not disrupt the setting of the listed building. Submitted plans indicate that one of the front vaults could be used for bike storage purposes. It is noted that access to this level with a bicycle would be difficult, however no objection is necessary raised to this proposal.

10.2. As the proposed vault excavations appear to be below a public footway/highway they have the potential to affect the integrity of these structures. Any works which will or may affect the structural integrity of the highway requires approval and inspection by the Council's Engineering Service's structural engineers. As this is possibly the case, an 'Approval in Principal' report under highways legislation will need to be secured as part of a legal agreement to address the concerns of the Council's Engineering Services.

## **11. Planning application information**

11.1. 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 and listed building consent]
- 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'
- Internal Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed' where openings would be formed between GF – 3<sup>rd</sup> floor levels
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and access statement
- Revised heritage statement
- Noise impact assessment (if plant is proposed)
- Basement Impact Assessment (at least to screening stage)
- Sample photographs/manufacturer details of proposed external facing materials
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information.

11.2. We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by sending out e-alerts putting up notices 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.

11.3. 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 me direct.

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

Yours sincerely,

**John Diver**

Senior Planning Officer

Regeneration and Planning

Supporting Communities

London Borough of Camden

Telephone: 02079746368

Web: [camden.gov.uk](http://camden.gov.uk)

**Appendix One:**  
**Cumulative Massing Diagram (nos.26-28)**

