

7-8 JEFFREY'S PLACE

Heritage Statement

April 2018

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1. INTRODUCTION

This Heritage Statement is supplied to provide an assessment of the heritage context of 7-8 Jeffrey's Place, Camden, London, NW1 9PP (henceforth 'the Site'), as part of a planning application for a single storey roof extension to the property to provide a 3 bedroom residential unit.

The Site falls within the Jeffrey's Street Conservation Area and is in the vicinity of listed buildings, particularly at 7-10 Ivor Street and to the north on Jeffrey's Street. The Site itself is neither statutorily nor locally listed.

The Site was the subject of a planning application, (2015/4920/P) which, after rejection by the London Borough of Camden, was taken to and dismissed at appeal in July 2016. This report accompanies a new application which seeks to address the concerns raised during the previous planning and appeal process. The outcome of the design-led process responding to the specific design related reasons for refusal, has resulted in a more discreet roof extension proposal, which has also enabled additional floorspace to accommodate a 3-bedroom unit.

This report will:

- Outline the heritage legislative and policy framework for the Site;
- Identify the historic development of the Site and surrounding area;
- Describe the Site and relevant designated heritage assets;
- Appraise the heritage value of the Site and identify its contribution to the significance of surrounding heritage assets; and,
- Provide an assessment of the proposals for the Site with regard to their impact on these heritage assets.

The existing Site and surrounding area was appraised during a site visit (February 2018), and desk-based research has also been undertaken to inform report findings. This includes review of material in Camden Local Studies archives, London Metropolitan Archive, British Newspaper Archive, Jeffrey's Place Conservation Area Assessment and previous

planning applications. Map sources consulted include OS mapping and Goad Maps.

The report is produced by Icen Projects. Specifically, it is authored by Genevieve Arblaster-Hulley BA (Hons), Heritage Consultant, with input and guidance by Laurie Handcock MA (Cantab) MSc IHBC, Heritage Team Director.

2. RELEVANT LEGISLATION, POLICY, AND GUIDANCE

2.1 Legislation

Planning (Listed Buildings and Conservation Areas) Act 1990

Section 72 of the Act establishes a duty in the exercise of any function under the Act to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area. A conservation area is an area of local interest designated principally by the Local Planning Authority.

2.2 National Policy

National Planning Policy Framework 2012

In March 2012, the government published the National Planning Policy Framework ("NPPF"), which immediately replaced the previous policy regime, including the design and heritage policies set out in Planning Policy Statement 1: Delivering Sustainable Development (PPS1), and Planning Policy Statement 5: Planning for the Historic Environment (PPS5).

This national policy framework encourages intelligent, imaginative and sustainable approaches to managing change. Historic England has defined this approach, which is reflected in the NPPF, as 'constructive conservation': defined as 'a positive and collaborative approach to conservation that focuses on actively managing change...the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment' (Constructive Conservation in Practice, Historic England, 2009).

The NPPF promotes sustainable development as a fundamental theme in planning and sets out a series of 'Core Planning Principles' (Paragraph 17). These core principles highlight that planning should be a creative exercise in finding ways to enhance and improve the places in which people live their lives; that it should secure high quality design and a good standard of amenity; and that heritage assets should be conserved in a manner appropriate to their significance, so that they can be enjoyed for

their contribution to the quality of life of this and future generations.

Section 7, 'Requiring Good Design', reinforces the importance of good design in achieving sustainable development, by ensuring the creation of inclusive and high quality places. This section of the NPPF affirms, in paragraph 58, the need for new design to function well and add to the quality of the surrounding area, establish a strong sense of place, and respond to local character.

The guidance contained within Section 12, 'Conserving and enhancing the historic environment', relates to the historic environment, and developments which may have an effect upon it.

Heritage Assets are defined in Annex 2 of the NPPF as: a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. They include designated heritage assets (as defined in the NPPF) and assets identified by the local planning authority. Listed buildings and Conservation Areas are both designated heritage assets.

'Significance' is defined as 'The value of a heritage asset to this and future generations because of its heritage interest. This interest may be architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.'

The 'Setting of a heritage asset' is defined as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'

Paragraph 128 states that, when determining applications, local planning authorities should require applicants to describe the significance of the heritage assets affected and any contribution made by their setting. The level of detail provided should be proportionate to the significance of

the asset and sufficient to understand the impact of the proposal on this significance. According to Paragraph 129, local planning authorities are also obliged to identify and assess the significance of any heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.

Paragraph 131 emphasises that local planning authorities should take account of: the desirability of new development making a positive contribution to local character and distinctiveness; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 132 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. It emphasises that the weight given to an asset's conservation should be proportionate to its significance, and that clear and convincing justification will be required for loss and harm to heritage assets.

Paragraphs 133 and 134 address the balancing of harm against public benefits. If a balancing exercise is necessary (i.e. if there is any harm to the asset), considerable weight should be applied to the statutory duty where it arises. Proposals that would result in substantial harm or total loss of significance should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss (per Paragraph 133). Whereas, Paragraph 134 emphasises that where less than substantial harm will arise as a result of a proposed development, this harm should be weighed against the public benefits of a proposal, including securing its optimum viable use.

In accordance with the NPPF, this Heritage Statement sets out the significance of heritage assets likely to be affected by the proposed works. The information provided in this assessment conforms to paragraph

128 of the NPPF, thus the level of detail provided is proportionate to the significance of the affected heritage assets and no more than is sufficient to understand the potential impact of the proposal on that significance.

Guidance on the application of heritage policy within the NPPF is provided within the PPS 5 Planning Practice Guide (English Heritage, 2010) and the on-line National Planning Policy Guidance (NPPG).

Planning Practice Guidance (“PPG”) (Department for Communities and Local Government, March 2014)

The guidance in the PPG supports the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle. It states that conservation is an active process of maintenance and managing change that requires a flexible and thoughtful approach, and that neglect and decay of heritage assets is best addressed through ensuring that they remain in active use that is consistent with their conservation.

The PPG refers to key elements of a building’s special architectural or historic interest when assessing harm. If proposed works adversely affect a key element of the heritage asset’s special interest, then those works could amount to substantial harm. It is the degree of harm rather than the scale of development that is to be assessed by the decision taker. Substantial harm is stated to be a high test that may not arise in many cases.

Harm may arise from works to the heritage asset or from development within its setting. Setting is stated to include the surroundings in which a heritage asset is experienced, and may be more extensive than its curtilage. A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

The PPG also provides clear guidance on the meaning of ‘public benefits’,

particularly in relation to historic environment policy, including paragraphs 132 to 135 of the NPPF. The PPG makes clear that public benefits should be measured according to the delivery of the three key drivers of sustainable development: economic, social and environmental outcomes, all of which are reflected in the roles of the planning system (per Paragraph 7 of the NPPF).

2.3 Strategic Policy

The current adopted London Plan (2016) incorporates the changes made in the Revised Early Minor Alterations to the London Plan (2013), Further Alterations to the London Plan (2014), and Minor Alterations to the London Plan (2015). The Revised Early Minor Alterations to the London Plan (REMA) set out minor alterations in relation to the London Plan and changes to UK legislation including the Localism Act (2011) and the NPPF. The revisions amend and split paragraph 7.31 supporting Policy 7.8 Heritage Assets and Archaeology with regard to developments affecting the setting of heritage assets, the need to weigh developments causing less than substantial harm on heritage assets against the public benefit and the reuse or refurbishment of heritage assets to secure sustainable development. The Glossary for the REMA also contains definitions for ‘Heritage Assets’ and ‘Substantial Harm’. The Further Alterations to the London Plan (2014) updated policy in relation to World Heritage Sites in London and the assessment of their setting.

The current London Plan deals with heritage issues in Chapter 7, London’s Living Spaces and Places – Historic environment and landscapes.

London Plan Policy 7.4 requires development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings. The design of buildings, streets and open spaces should provide a high-quality design response enhancing the character and function of an area.

London Plan Policy 7.6 notes that the architecture should “make a positive

contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context”.

London Plan Policy 7.8 states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. 6

Policy 7.8 ‘Heritage assets and archaeology’ establishes the following clauses regarding heritage assets in London:

Strategic: London’s heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

Planning Decisions: Development should identify value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

2.4 Local Development Plan

Camden Council Local Plan (2017)

Camden Council’s Local Plan was adopted on 3 July 2017, this document alongside supplementary guidance including Conservation Area appraisals, site allocations and Neighbourhood Plans forms the basis of Camden Council’s planning decisions.

Relevant heritage and design Local Development plan policies are

outlined below:

Policy D1 Design

The Council will seek to secure high quality design in development.

The Council will require that development:

- a. respects local context and character;
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d. is of sustainable and durable construction and adaptable to different activities and land uses;
- e. comprises details and materials that are of high quality and complement the local character;
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g. is inclusive and accessible for all;
- h. promotes health;
- i. is secure and designed to minimise crime and antisocial behaviour;
- j. responds to natural features and preserves gardens and other open space;
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example

through planting of trees and other soft landscaping,

- l. incorporates outdoor amenity space;
- m. preserves strategic and local views;
- n. for housing, provides a high standard of accommodation; and
- o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Tall buildings

All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:

- p. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;
- q. the historic context of the building's surroundings;
- r. the relationship between the building and hills and views;
- s. the degree to which the building overshadows public spaces, especially open spaces and watercourses; and
- t. the contribution a building makes to pedestrian permeability and improved public accessibility. In addition to these design considerations tall buildings will be assessed against a range of other relevant policies concerning amenity, mixed use and sustainability.

Excellence in design

The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design.

Policy D2 Heritage

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Designated heritage assets

Designated heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm. Conservation areas Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural

and historic interest of the building; and

- k. resist development that would cause harm to significance of a listed building through an effect on its setting.

Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate. Other heritage assets and non-designated heritage assets The Council will seek to protect other heritage assets including nondesignated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares. The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

Policy G1 Delivery and location of growth

The Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.

Delivery of growth

The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by:

- a. supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;

- b. resisting development that makes inefficient use of Camden's limited land;

- c. expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible; and

- d. supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.

Location of growth

Development will take place throughout the borough with the most significant growth expected to be delivered through:

- e. a concentration of development in the growth areas of, King's Cross, Euston, Tottenham Court Road, Holborn, West Hampstead Interchange and Kentish Town Regis Road;
- f. development at other highly accessible locations, in particular Central London and the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead; and
- g. the Council's Community Investment Programme (CIP). The Council identifies and provides guidance on the main development opportunity sites in the borough through our Camden Site Allocations and Area Action Plans. The Council will require development in the growth areas, other highly accessible and CIP areas to be consistent with the area priorities and principles set out below.

3. HISTORIC DEVELOPMENT OF SITE AND SURROUNDINGS

3.1 Historical Development

Kentish Town, the main settlement in the ancient parish of St Pancras, remained dispersed until the eighteenth century when ribbon development began to encroach along the main roads. The prevalent surrounding land use was for cattle farming serving the milk demands of the nearby growing City population. The area around Jeffrey's Place formed the southern end of Kentish Town.

In the late eighteenth century extensive development along the east side of Camden High Street began under the auspices of Lord Camden who had obtained an Act of Parliament to allow development in 1791. Jeffrey's Street was laid out c.1800, and developments to the east of Camden High Street began to merge with the southern part of Kentish Town with the building of Mansfield Place (now Holmes Road) and Spring Place to the north of the Site. In spite of the increased number of developments in the surrounding area, the street form remained broadly linear along the old major roads.

The terraces constructed on Jeffrey's Street in the early nineteenth-century are in the manner of a fourth-rate town house as described by Peter Nicholson in 1823 in 'The Newpractical (sic.) Builder and Workman's Companion' a building pattern book of the time. The 1830 Greenwood Map (figure 3.1) shows several planned streets laid out, including Jeffrey's Street, Prowse Place, Camden Terrace, and roads to the east of College Street, however neither Jeffrey's Place nor Ivor Street are yet to be plotted. The terraces of Jeffrey's Street are clearly marked, sitting directly on the street but in plots with fairly long gardens to the rear.

In 1836-37 the terrace of cottages at the south-west end of Ivor Street (then Priory Street) were constructed¹. Unlike the uniform terrace laid out on Jeffrey's Street, construction on the north side of Ivor Place appears to have been gradual and piecemeal, whilst the south side contains a terrace of greater uniformity, which originally extended right to the end of Priory Place.

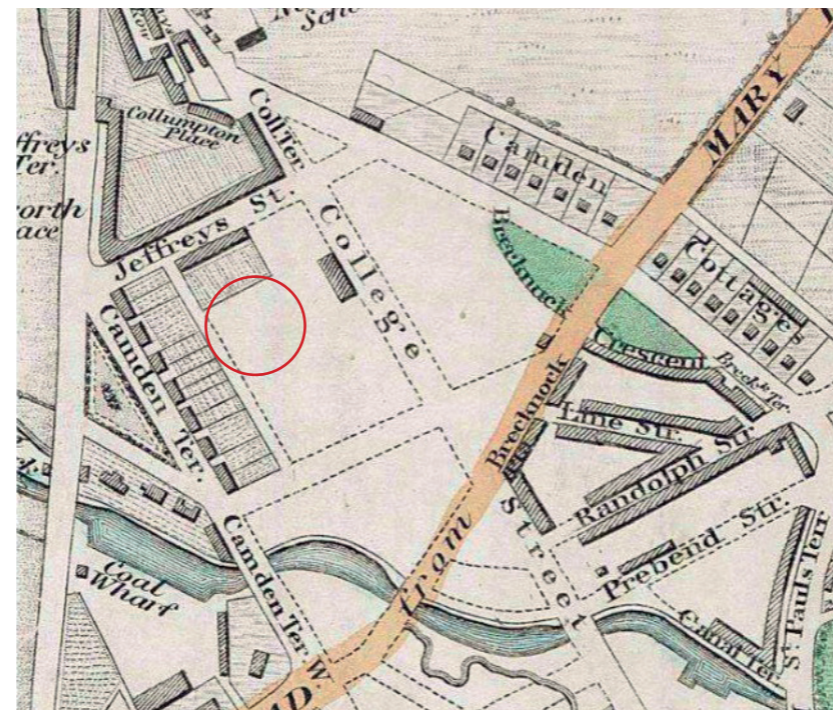


Figure 3.1: 1830 Greenwood Map, Camden Local Studies



Figure 3.2: 1862 Stanford's Map of London

To the west of the Site, between Haverstock Hill and Kentish Town, development began in earnest following the sale of Lord Southampton's land in 1840². In 1850, at the same time fields were being laid out for streets and building plots and terraces erected, the North London Railway line was built through the area on a large brick viaduct commanding parts of the skyline near the Site.

Stanford's Map of 1862 (figure 3.2) therefore depicts a considerably denser streetscape than 32 years earlier. However, whilst Jeffrey's Place has been laid out to facilitate rear access to the houses on Ivor Street and Jeffrey's Street, neither building plots appear to have been delineated, nor buildings erected at this date. In the surroundings it is notable that at this date Camden Station sits on the eastern side of Camden Road and College Street. The surrounding area remained predominately residential.

By the 1873 OS map (figure 3.3) the Site and surroundings have changed dramatically. A very dense streetscape has been further crowded by the relocation of Camden Town station to the rear of the south side of Priory Street. The part of the terrace at the south-western end of Ivor Street (Priory Street) has been demolished to make way for additional lines of track to run into the new station. The railway became highly dominant in the surroundings of the Site. Significant changes on Jeffrey's Place with new buildings to the eastern end of the street. The southern side of Jeffrey's Place has become more enclosed with considerable infill to the rear gardens of 7 and 8 Ivor Street, on the area of the Site. However this infill does not appear to be the result of the creation of new plots from the back gardens of Ivor Street indicating that the buildings are likely to be workshops relating to the domestic dwellings on Ivor Street. At this date the area of the Site contains three buildings formed to the rear of no 8 Ivor Street and two buildings in an L shape to the rear of 7 Ivor Street. These buildings do not appear to form any part of the current building at 7-8 Jeffrey's Place.

By 1896 the OS map (figure 3.5) shows that the buildings on the site of 7-8 Jeffrey's Place have been altered and appear now to be on their own plot, disconnected from the dwellings on Ivor Street. An archway leads to a

yard behind 7 Jeffrey's Place, separated from the remaining garden of Ivor Street. An L-shaped building has replaced the previous long rectangular form at 8 Jeffrey's Place. Further buildings have been erected along Jeffrey's Place to the rear of nos. 9 and 10 Ivor Place and two outbuildings on the north side to the rear of Jeffrey's Street. Dwellings (extant) have been erected on the west side of Prowse Place (then Priory Place) infilling the space at the rear of gardens to Camden Street south of the former Camden Lecture Hall (which had become a School for both Boys & Girls by that date).

Between 1898 and 1899 Charles Booth's poverty maps were produced and depict the surrounding area as working class and poor (figure 3.6). The accompanying notebooks state that 'Priory Street [Ivor Place] remains purple. No.1 was the scene of the murder of a woman by Mrs. Peacey.' Jeffrey's Street was described as 'a quiet working-class street.' Whilst Jeffrey's Place 'consists of three 3 storey houses, stucco. Running N. S'.³ This description of Jeffrey's Place points to the buildings running north-south at the eastern end being the only dwellings on the street, with the other buildings holding a commercial, possibly workshop use.

By 1916, the north side of Jeffrey's Place has been built on, taking up half of the rear gardens to the south side of Jeffrey's Street (figure 3.7). The largest two of these buildings, with deep profiles, appear to be in commercial use, whilst the building on the corner is the three-storey tenement building still extant. Nos 7-8 Jeffrey's Place is little changed and the other surroundings are substantially the same. At this time therefore the character of the area was mixed. Jeffrey's Place contained a mixture of light factory and workshop premises. The surrounding area had become increasingly less residential with more commercial or light-manufacturing premises erected or buildings converted to this use, including many of the buildings between Prowse Place and Camden Street, with areas under the railway arches in particular adopted as commercial spaces.

The first post-war map of the area was produced in 1952 (figure 3.8) and shows both changes to the profile of the Site and an increase in buildings used for commercial purposes in the surroundings. 7-8 Jeffrey's Place as

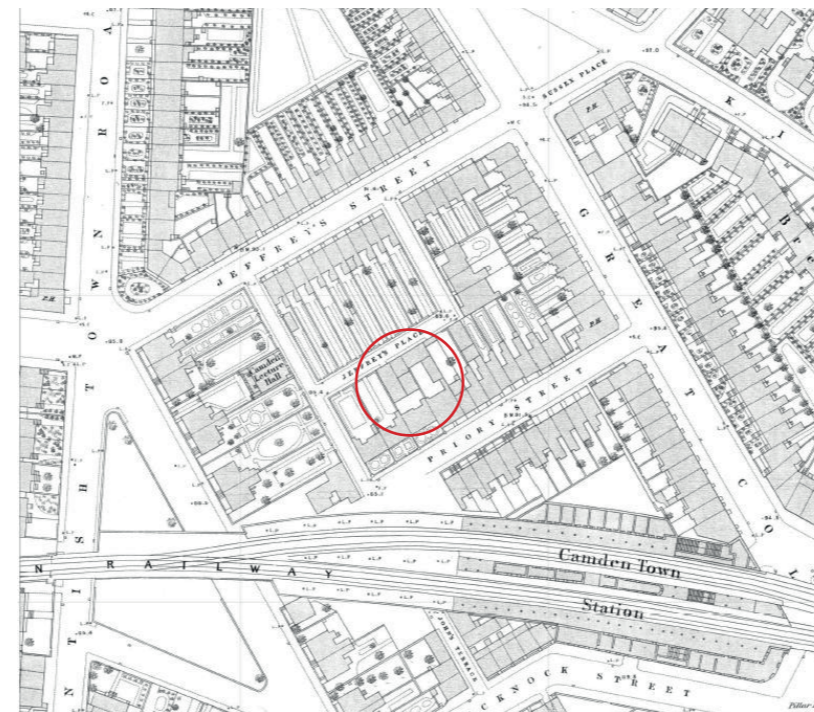


Figure 3.3: OS Map 1873

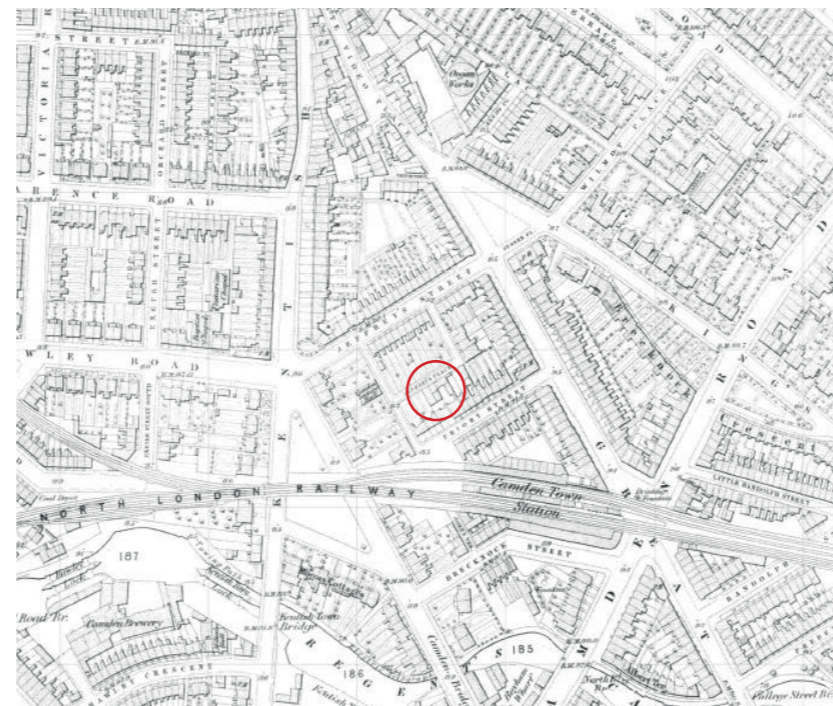


Figure 3.4: OS Map 1879

it stands today has been erected by this point. It is noted as a 'Pipe Factory' on the map and was originally a factory of B. Barling & Sons, whose primary premises was at 9 Park Street, NW1⁴. To the opposite side of Jeffrey's Place was 'Priory Works' a Cabinet makers workshop, Camden Cap Factory within the site of the former school, and Sebry Staircase & Ironworks also on Prowse Place next to the railway arches. To the west of 7-8 Jeffrey's Place the buildings appear to have been re-built and now form nos. 6 and 8 Prowse Place, No.8 running from the road junction to the side return of the pipe factory.

1969 OS mapping (figure 3.9) shows that the cabinet makers workshop to the north side of Jeffrey's Place is now in use as a Scientific Instrument Works, probably an additional manufacturing space for Hilger Scientific Instruments who were based on Camden Road and operated a number of sites in the area.

By the 1982 OS map (figure 3.10), the Site remains much the same in form, but is now referenced as just a 'factory', meanwhile the former factory site to the north side of Jeffrey's Place has been demolished and the current terrace of eight houses has been erected.

In recent years the surrounding area has become popular for residential uses again, with many of the former factory sites demolished with housing erected on the site, or converted to residential units. The Site fell out of factory use and was converted to high-quality residential units in 2015/2016.

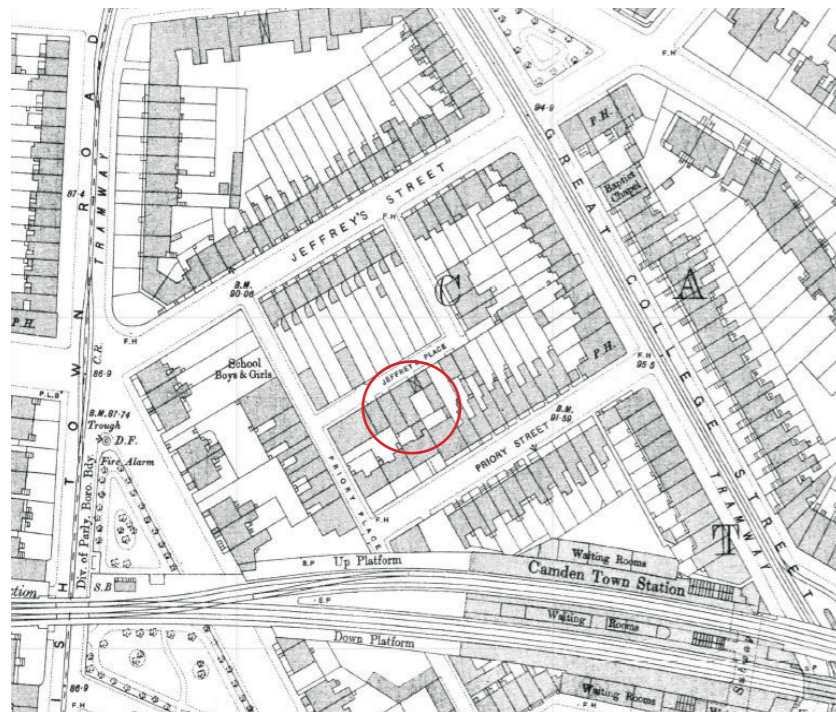


Figure 3.5: OS Map 1896

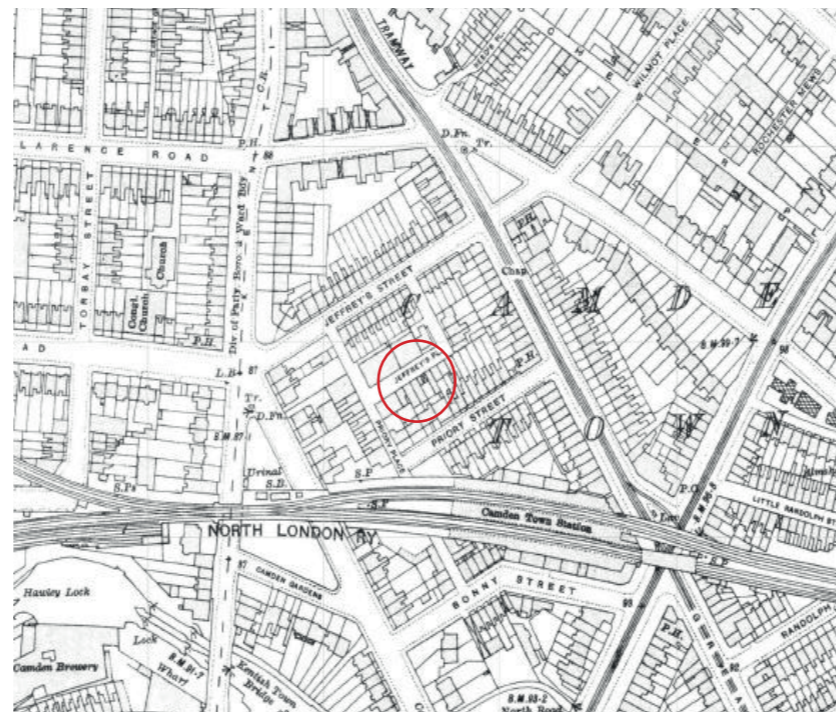


Figure 3.7: OS Map 1916



Figure 3.9: OS Map 1969



Figure 3.6: 1898 Charles Booth's Descriptive Map of London Poverty. Pink indicates fairly comfortable. Purple indicates Mixed, comfortable/poor. <https://booth.lse.ac.uk/map>



Figure 3.8: OS Map 1952

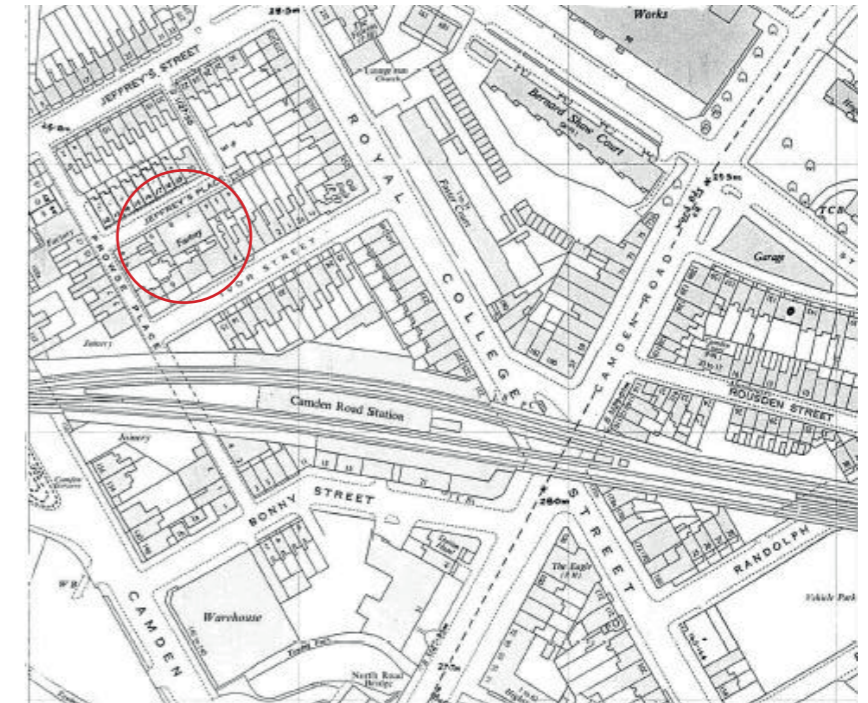


Figure 3.10: OS Map 1982

3.2 Planning History

The planning history applicable to the Site is summarised in the table.

Planning Application Reference	Validation Date	Response	Details
2015/4920/P	19/07/2016	Appeal Dismissed	Erection of a single storey roof extension to create a two bedroom flat
2015/1486/P	10/04/2015	Granted	External alterations to flats (approved under ref: 2015/0232/P) including replacement of all windows and doors and removal of existing roof lights to create two courtyards at rear.
2015/0232/P	02/03/2015	Granted prior approval subject to Section 106 agreement	Change of use from office (Class B1) at ground, first and second floor levels to residential use (Class C3) to provide 6 x 2 bed flats.
2014/6648/P	30/12/2014	Refuse Prior Approval	Change of use from office (Class B1) at ground, first and second floor levels to residential use (Class C3) to provide 6 x 2 bed flats.

4. SITE DESCRIPTION AND IDENTIFICATION OF ASSETS
