

<b>Delegated Report</b>  (Refusal)		<b>Analysis sheet</b>		<b>Expiry Date:</b>	<b>26/04/2018</b>
		N/A / attached		<b>Consultation Expiry Date:</b>	<b>29/03/2018</b>
<b>Officer</b>			<b>Application Number(s)</b>		
Robert Lester			(i) 2018/0509/P (ii) 2018/1110/L		
<b>Application Address</b>			<b>Drawing Numbers</b>		
21 John Street London WC1N 2BF			Refer to Decision Notices		
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>		
<b>Proposal(s)</b>					
(i) Erection of roof extension at 8th floor level to provide an additional 1 bed residential flat. (ii) Erection of roof extension at 8th floor level and associated internal works to the building to create a 1 bedroom flat					
<b>Recommendation(s):</b>		(i) Refuse Planning Permission (ii) Refuse Listed Building Consent			
<b>Application Type:</b>		(i) Full Planning Permission (ii) Listed Building Consent			

Conditions or Reasons for Refusal:	Refer to Decision Notices				
Informatives:					
Consultations					
Adjoining Occupiers:		No. of responses	5	No. of objections	5
Summary of consultation responses:	Planning application (i): 3 x site notices (1 x John Street, 1 x John Mews and 1 x Roger Street) were erected on the 06/03/2018 and a press advert was placed in the local newspaper on the 08/03/2018. The consultation period expired on the 29/03/2018.				
	Listed Building application (ii): Site notice erected 16/05/2018 and press advert placed in the local newspaper 24/05/2018. The consultation period expired on the 14/06/2018.				
	5 responses were received with the following objections/comments:				
	<div>1. The extension by reason of scale, height and design would harm the character of the conservation area and the Grade II listed building which is already the tallest building on this street. It would also adversely affect the setting of adjacent listed buildings due to its dominant scale and relationship when viewed from Millman Street and Rugby Street.</div>				
	<div>2. This is also an iconic 1930's building which responds in scale to the existing streetscape of Georgian Bloomsbury. This extension will distort that, and will be especially noticeable from a distance i.e. Roger Street and Doughty Street. The extension would be visible from long views, particularly the north and west elevations where the roof extension will infill without a setback.</div>				
	<div>3. The council required a high standard in the 2012 conversion of this building into flats and also stated that no additional built form should be added.</div>				
	<div>4. The benefits of the development to provide a small 1 bed flat do not outweigh the harm caused to the listed building.</div>				
	<div>5. Amenity impact from construction activities including noise and highway safety issues and the impact on deliveries to nearby businesses.</div>				
	<div>6. Amenity impact in terms of light, noise, privacy on many of the surrounding terrace and mews houses, including those on Roger Street and Doughty Mews. The extension would add 5 new windows on the north elevation overlooking Roger Street, which would be particularly problematic for 1A Doughty Street.</div>				
	<div>7. Amenity impact in terms of noise and vibration on the flats below.</div>				

	<p>8. An additional top floor/flat on top would further delay fire escape from the building up and over to adjoining walls and buildings.</p> <p><i>Case Officer's Response: The following report provides a response to these design/amenity issues.</i></p>
<p><b>CAAC/Local groups comments:</b></p>	<p><u>Bloomsbury CAAC – Objection</u></p> <p>The proposal will harm the buildings setting with the conservation area and should be rejected.</p> <p>The street is characterised by Georgian townhouses on either side which are predominantly 4-5 stories high. No 21 John Street is the tallest structure on the street but there is no justification to make it even taller.</p> <p>The extension by reason of scale, height and design would harm the character of the conservation area and the Grade II listed building. It would also adversely affect the setting of adjacent listed buildings due to its dominant scale and relationship when viewed from Millman Street and Rugby Street.</p> <p><i>Case Officer's Response: The following report provides a response to these design issues.</i></p>

## Site Description

The application site at 21 John Street, situated on the corner of John Street and Roger Street, is an 8 storey building which was originally in office use. The upper 6 floors were converted to residential use following permission granted in 2013 (ref: 2012/5486/P & 2012/5504/L). The site is under a single Grade II Listing along with the adjoining Duke of York Public House (7 Roger Street) and flat nos. 1-4 Mytre Court (John's Mews). It is located at the northernmost end of the block bound by John Street (to the east), Roger Street (to the north) and John's Mews (to the west).

The listing description states that it is a steel-framed building with artificial stone facing to the ground and first floor, red brick above, and metal casement windows. The third floor is accentuated by stone banding which forms a continuous sill and lintel to the windows which are separated by panels of fluted brickwork. The set-back top storey has banded rustication in the brickwork between the windows and an artificial stone cornice. The set-back is particularly deep on the John Street elevation and here the cornice forms a projecting canopy, inset with glass blocks. The building is entered from John Street where the original glazed hardwood door is flanked by two tall, engaged pylons with sculpted tops. Each depicts a woman, in the stylised fashion of the 1930s and reminiscent of the work of Eric Gill. In keeping with the scale of the back streets and mews, the building height drops to three storeys half way along Roger Street. The elevations are treated in the same way as the frontage block, with the ground and first floor in artificial stone and the third floor in brick. Internally the listing description acknowledges that the floorplates include features and fixtures that are recent in date. It is however also noted that the entrance lobby has fluted pilasters, a slender decorative frieze and a coved cornice to the ceiling, which has stepped shallow mouldings and that the fire escape stairs and doors are original.

The Duke of York Public House is located on the canted corner of the building between Roger Street and John Mews. The building at this point is three storeys and basement, with a flat associated with the pub located on the upper floors. Also facing John's Mews is the four-storey block of flats (known as Flats 1-4 Mytre Court). The frontage is symmetrical with curved brick balconies with concrete bases and coping either side of a canted bay window. The ground floor has banded brick rustication and a central door under a concrete canopy. The flat roof is bounded by iron railings.

As outlined above, the application site was listed in 2010. The listing description outlines that this was owing to the following principal reasons:

- Architectural: a stylish design characteristic of the 1930s, which responds in scale and materials to the existing streetscape of Georgian Bloomsbury.
- Sculptural embellishment: two engaged pylons with sculpted tops flanking the main entrance.
- Materials and detailing: good brickwork and careful detailing on the pub and flats.
- Intactness: an unusual degree of surviving original fabric in the Duke of York public house.
- Planning interest: a mixed use development combining commercial offices with a block of flats and a public house, and therefore particularly forward looking for its time.

The application site is also located within Bloomsbury Conservation Area, the Central London Area and the Blackheath Point to St Paul's Cathedral viewing corridor. The site has a Public Transport Accessibility Level of 6a (excellent) and is located within a Controlled Parking Zone (CA-D) Kings Cross (Mon-Fri 08:30-18:30 and Sat 08:30-13:30).

The application site is surrounded by a variety of buildings and types of uses. To the north beyond Roger Street are the buildings located on the south-western side of Doughty Street. This terrace of 19 buildings (No's 1-19 consecutive) is Grade II listed and predominantly in residential use. No. 1 opposite the application site comprises a number of self-contained flats and office uses within the wing fronting onto Roger Street. To the east is the junction of Roger Street with Doughty

Street (to the north-east) and John Street (to the east and south-east). The eastern side of John Street contains a terrace of 11 Grade II listed terrace houses, which comprise a mix of residential and commercial uses. To the south is the unlisted 21a John Street, a basement and five storey office building known as Bedford House which also fronts onto John's Mews. To the west of the site is St George The Martyr CE Primary School. To the north-west is the recently constructed 1a Doughty Mews (three storey mews dwellinghouse).

### **Relevant Planning History**

2012/0277/P - Change of use of 2nd to 7th floors of 21 John Street from offices (Class B1) to 8 (1x1, 6x2 and 1x3 bed) self-contained residential units (Class C3), provision of bike and bin stores in rear courtyard, replacement of window with door on rear courtyard (south-west elevation) at ground floor level, green roof above second floor level, replacement of windows to 21 John Street, upper floors of 7 Roger Street and 1-4 Mytre Court, John's Mews and associated works – Withdrawn - 14/01/2013

2012/0309/L - Internal and external alterations in association with the change of use of 2nd to 7th floors of 21 John Street from offices (Class B1) to 8 (1x1, 6x2 and 1x3 bed) self-contained residential units (Class C3), provision of bike and bin stores in rear courtyard, replacement of window with door on rear courtyard (south-west elevation) at ground floor level, green roof above second floor level, replacement of windows to 21 John Street, upper floors of 7 Roger Street and 1-4 Mytre Court, John's Mews and associated works – Withdrawn - 14/01/2013.

2012/5486/P - Change of use of 2nd to 7th floors of 21 John Street from offices (Class B1) to 8 (1x1, 6x2 and 1x3 bed) self-contained residential units (Class C3), provision of bike and bin stores in rear courtyard, replacement of window with door on rear courtyard (south-west elevation) at ground floor level, green roof above second floor level, replacement of windows to 21 John Street, upper floors of 7 Roger Street and 1-4 Mytre Court, John's Mews and associated works - Granted Subject to a Section 106 Legal Agreement - 14/01/2013.

2012/5504/L - Internal and external alterations in association with the change of use of 2nd to 7th floors of 21 John Street from offices (Class B1) to 8 (1x1, 6x2 and 1x3 bed) self-contained residential units (Class C3), provision of bike and bin stores in rear courtyard, replacement of window with door on rear courtyard (south-west elevation) at ground floor level, green roof above second floor level, replacement of windows to 21 John Street, upper floors of 7 Roger Street and 1-4 Mytre Court, John's Mews and associated works – Granted - 14/01/2013.

2014/2644/P - Use of part of 3rd floor flat roof and part of roof level flat roof as terraces, and associated installation of door and gate for access, enclosure of terraces and landscaping (part retrospective) - Granted - 18/07/2014.

2014/5738/P - Removal of condition 3 (green roof) of planning permission 2012/5486/P dated 14/01/2013 Granted - 06/11/2014.

2016/4325/P - - Roof extension at 8th floor level to provide additional living space for existing residential flat at 7th floor level - Withdrawn - 16/09/2016.

2016/4656/L - Roof extension at 8th floor level to provide additional living space for existing residential flat at 7th floor level - Withdrawn - 16/09/2016.

## Relevant policies

### National Planning Framework (2012)

### The London Plan (2016)

### The New Draft London Plan (2017)

### Camden Local Plan (2017)

G1 Delivery and location of growth  
H1 Maximising housing supply  
H4 Maximising the supply of affordable housing  
H6 Housing choice and mix  
H7 Large and small homes  
C5 Safety and security  
C6 Access for all  
A1 Managing the impact of development  
A4 Noise and vibration  
D1 Design  
D2 Heritage  
CC1 Climate change mitigation  
CC2 Adapting to climate change  
CC3 Water and flooding  
CC4 Air quality  
CC5 Waste  
T1 Prioritising walking, cycling and public transport  
T2 Parking and car-free development  
T3 Transport infrastructure  
T4 Sustainable movement of goods and materials  
DM1 Delivery and monitoring

### Camden Planning Guidance (adopted/updated 2018)

CPG 1 Design  
CPG Housing (interim)  
CPG 2 Housing  
CPG 3 Sustainability  
CPG Amenity  
CPG 6 Amenity  
CPG Biodiversity  
CPG 7 Transport  
CPG 8 Planning obligations

### Bloomsbury Conservation Area Appraisal and Management Plan (2011)

## Assessment

### 1 Proposed Development

1.1 The proposed development is a roof extension at 8th floor level to provide a new 1 bed residential flat (50 sq. m). The extension would be situated on the southern part of the roof and set back from the east, north and west elevations. The design and materials to be used would match the existing building.

1.2 The main planning matters to assess on this application are:-

- the principle of development,
- housing considerations,
- design, heritage and conservation impact,
- amenity considerations
- transport,
- energy & sustainability, and
- air quality.

## 2 Principle of Development

2.1. The proposed development would provide an additional residential flat at the site and would therefore increase housing supply in the borough in accordance with policy H1. However, whilst there is a need for additional housing in the borough and the general principle of adding to the housing stock is supported, there are significant concerns regarding the scale and design of the roof extension and its impact on the Listed Building and Conservation Area, which are discussed in detail in the design section below.

## 3. Housing Considerations

3.1 In accordance with Policy H4 the Council requires a contribution to affordable housing from all developments providing one or more additional residential units with an increase in floorspace of 100m<sup>2</sup> (GIA) or more. Although the development would provide one additional residential unit, the proposed floorspace at 51 sq. m would be below 100 sq. m, therefore no affordable housing contribution is required for this development.

3.2 Policy H6 states that the Council will seek to secure high quality accessible homes and will expect all self-contained homes to meet the Nationally Described Space Standards (2015). The proposed residential accommodation would also need to meet the standards in the Council's Housing SPG.

3.3 The development proposes a one bed two person flat with a floorspace of 50 sq. m in accordance with the National Minimum Floorspace Standards. The development would have an adequate access, internal layout of rooms and floor to ceiling height and daylight in accordance with the Council's guidance. The development would also provide a suitable vertical room stacking arrangement with the existing flat below.

## 4. Design and Heritage

### *Relevant policies*

4.1 The building forms part of a Grade II Listed Building and is within the Bloomsbury Conservation Area.

4.2 The Listed Buildings and Conservation Areas Act 1990, as amended by the Enterprise and Regulatory Reform Act 2013, sections 16 and 72 require special regard to be had to the desirability of preserving the special interest of listed buildings and their settings and preserving and enhancing the character and appearance of conservation areas.

4.3 The design of the proposal has been assessed against Local Plan Policies D1 and D2, Camden Planning Guidance 1 (Design), The Bloomsbury Conservation Area Appraisal and Management Strategy, the London Plan (2016), and the National Planning Policy Framework (2012).

4.4 Policy D1 requires development to respect local context and character. 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. 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. It requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. It also states that the Council will resist proposals for alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and resist development that would cause harm to significance of a listed building through an effect on its setting.

4.5 The Bloomsbury Conservation Area Appraisal and Management Plan describes John Street as a wide and grand street comprising mainly Georgian terraced houses. It also refers to these townhouses as having significance as they are almost complete Georgian streets/terraces. Buildings on John Street are generally of four storeys with basements, some are stuccoed at ground floor and some have mansard roofs with dormer windows. A number of townhouses are of particular architectural significance and are thus listed. It states that whilst the building at no. 21 is significantly larger than its neighbours, rising to eight storeys, it has fine Art Deco influenced 1930s detailing, particularly around the main entrance and at roof level. It was listed at Grade II in September 2010 because it is a stylish design characteristic of the 1930s, which responds in scale and materials to the streetscape of Georgian Bloomsbury, the quality of its sculptural embellishment and brickwork and its planning interest as an early mixed use development of commercial offices, flats and a public house which was particularly forward-looking for its time. Significant views identified include those along Doughty Street and John Street; looking north the view is terminated by Mecklenburgh Square, looking south, views are obtained towards Gray's Inn Gardens. It states that high quality design and high quality execution will be required of all new development at all scales. The Conservation Area retains many diverse historic rooflines which it is important to preserve. Fundamental changes to the roofline or insensitive alterations can harm the historic character of the roofscape and will not be acceptable.

4.6 Camden Planning Guidance 1 (Design) states that additional storeys and roof alterations are likely to be acceptable where alterations are architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form. A roof alteration or addition is likely to be unacceptable in the following circumstances where there is likely to be an adverse effect on the skyline, the appearance of the building or the surrounding street scene: buildings already higher than neighbouring properties where an additional storey would add significantly to the bulk or unbalance the architectural composition and where the building is designed as a complete composition where its architectural style would be undermined by any addition at roof level.

#### *Assessment of Design and Heritage Impacts*

4.7 The building at 21 John Street is Grade II listed. It was built in the late 1930s and is an attractive Art-deco style mixed use property. Its special architectural and historic interest derives from its stylish design characteristic of the 1930s, which responds in scale and materials to the existing streetscape of Georgian Bloomsbury and being one of the first mixed use developments combining commercial offices with a block of flats and a public house, and therefore particularly progressive for its time. The building comprises a 4 story block of flats along Doughty Mews, a 3 storey pub on the corner of Doughty Mews and Roger Street and a tall 8 storey commercial block fronting John Street, the upper 6 floors of which were converted to residential accommodation in 2012.

4.8 The site is located within the Bloomsbury Conservation Area. The almost complete Georgian terraces of townhouses along John Street are significant to the character of the conservation area. Significant views include those along Doughty Street and John Street; looking north the view is terminated by Mecklenburgh Square, looking south views are obtained towards Gray's Inn Gardens. A number of townhouses are of particular architectural significance and are thus listed. Whilst the building at No 21 is significantly larger than its neighbours, rising to eight storeys, it has fine Art Deco



influenced 1930s detailing; particularly around the main entrance and at roof level. It was listed at Grade II in September 2010 because it is a stylish design characteristic of the 1930s, which responds in scale and materials to the streetscape of Georgian Bloomsbury, the quality of its sculptural embellishment and brickwork and its planning interest as an early mixed use development.

4.9 The building contains a small brick built service and lift overrun structure on the roof, which has limited visibility other than in long-distance views north and south and is particularly apparent from Mecklenburgh Square and its environ to the north. This service and lift overrun is located on the southern part of the roof and is setback with a 4m depth, 4.3m width and 2.6m height. The proposed roof extension would have an irregular footprint/layout which would match the building below including a curved section to the north east. The roof extension would be setback from the east elevation of the existing building by 6.3m (5m from the setback 7<sup>th</sup> floor below), setback from the north elevation by 3.5m and setback from the north west elevation by 2m. The design and materials to be used would match the existing building below.

4.10. The building is already the tallest building on John Street, which predominantly contains a strict pattern of Listed Georgian townhouses with a consistent scale and height which is an important element of the character of the Conservation Area. The existing 8 storey building at 21 John Street is the only building which punctures the general height and does so with a style and elegance expected of a building of national importance. The proposed roof extension at 8<sup>th</sup> floor level would extend above the height of the existing building, above the existing roof structure and would extend westward filling the majority of the roof space. The extension would be visible and prominent in long range views north and south along John Street. These views are mentioned in the Bloomsbury Conservation Area Appraisal and Management Plan as important to the character of the Conservation Area. The extension would draw undue attention to the building in long important views when the established and largely unbroken roofscape and skyline of the Georgian terrace street should be the dominant characteristic.

4.11 This listed building on the site has also been designed as a set piece which terminates successfully and elegantly at roof level. This existing 7th floor level of the building is set back (with a greater set-back on the John Street elevation), with a curved section, brickwork banding and an overhanging roof cornice with glass bricks. This existing roof design is specifically referred to in the Listing description and Conservation Area Appraisal and is considered to be an important element of the special architectural interest of the building. The proposed extension due to its scale, height, bulk and position at roof level would result in less refinement at roof level and would diminish the original architectural expression, form and scale of the listed building. It is therefore considered that the development would cause harm to the architectural integrity/special architectural interest of the listed building.

4.12 It is therefore considered that the proposed roof extension due to its scale, height, massing and position at roof level would be a prominent and discordant element which would not relate well to the height and original scale and composition of the building and would harm the special character and significance of the listed building. The prominence of the additional storey, with particular regard to the height of the existing building and the importance of the identified Conservation Area views, would result in harm to the character and appearance of the Conservation Area. The additional height and prominence of the roofscape is also considered to cause harm to the setting of the adjacent groups of listed terraces townhouses.

4.13 For these reasons the development would be contrary to Local Plan Policy D1 as it would fail to respect the local context and character. It would be contrary to Local Plan Policy D2 as the development would harm the special architectural interest of the listed building, would fail to preserve or enhance the character or appearance of the conservation area and would harm the significance of the adjacent listed townhouses on John Street/Doughty Street through an effect on their setting. The development would be contrary to Camden Planning Guidance 1 as roof extensions are unacceptable

and have an adverse effect on the skyline, the appearance of the building or the surrounding street scene where the building is already higher than neighbouring properties where an additional storey would add significantly to the bulk or unbalance the architectural composition and where the building is designed as a complete composition where its architectural style would be undermined by any addition at roof level. It would be contrary to the Bloomsbury Conservation Area Appraisal and Management Plan which identifies the historic significance of John Street as a street of Georgian terraced townhouses and refers to the fine Art-Deco design of 21 John Street which responds in scale and materials to the streetscape of Georgian Bloomsbury. It also identifies significant views looking north and south along Doughty Street & John Street. The proposed roof extension constitutes an insensitive alteration which harms the historic character of the roofscape. The development would be contrary to London Plan policy and 7.8 as it would fail to conserve the significance of heritage assets by being sympathetic to their form, scale, materials and architectural detail. Finally the development is considered to be contrary to the NPPF paragraph 134 as the development would result in less than substantial harm to the significance of the designated heritage assets (i.e. the listed building and conservation) and there are limited public benefits which do not outweigh the harm caused.

4.14 The fact that a structure already exists at roof level is not considered to be justification for the proposed works. This service and lift overrun structure is small and positioned to be concealed as far as possible and is also designed not to draw attention to its presence. It is also noted that a roof terrace to the roof was granted permission as part of the recent change of use. However, only part of the roof was to be used with the terrace set back from the edge of the roof to reduce the view and impact of the balustrading. The 'as-built' arrangement has a terrace covering the whole of the roof with reed matting (or similar) around the perimeter of the roof edge. This is not lawful and cannot be taken into account when considering the impact of the roof extension (the Council will consider taking Enforcement Action). This has a bearing on the assessment of the proposed scheme, because when seen in long views the screening created by the terrace enclosure reduces the refined 'brim' of the existing roof and adds to the existing perceived clutter on the roof.

## 5.0 Amenity Impact (Daylight, Sunlight, Outlook, Enclosure, Overlooking)

5.1 Policy A1 (Managing the impact of development) states that the Council will seek to protect the quality of life of occupiers and neighbours. It will only grant permission for development where it does not cause unacceptable harm to amenity. The Council seeks to ensure that the amenity of communities, occupiers and neighbours is protected. The factors we will consider include: visual privacy, outlook; sunlight, daylight and overshadowing.

5.2 In terms of assessing the amenity impact of the proposed roof extension, the closest residential properties to the roof extension are located at Mytre Court to the west (rear) and the rear elevation of the building to the northwest (rear). Mytre Court is a 4 storey residential building located on John's Mews to the rear of the site. The rear elevation of this building, which is 9m from the rear of the proposed extension, contains windows between ground and third floor levels. The rear elevation of the part of the building on the site that fronts Roger Street contains residential windows between third – seventh floor levels, which are between 5-9m from the rear of the proposed extension at an oblique angle. This rear courtyard is also enclosed by the existing 8 storey building on the site and the adjacent 6 storey building at 21a John Street. There are also residential properties further away including at no. 1 Doughty Street to the north, the side elevation of which faces onto the site at a distance of approximately 11m, together with the properties at 1a Doughty Mews, 20 John Street and 62 Doughty Street which are all sited over 21m away. The proposed roof extension would extend up to the rear (west and south) elevations of the building and would increase the height of the building by 2.8 m approx. The existing lift/stair overrun building does extend above roof level at 8<sup>th</sup> floor level at a similar height, but this building is set well in on the roof.

5.3 In relation to the impact on the residential building to the rear at Mytre Court and the south elevation of the Roger Street wing of the building, supporting information has been submitted including plans showing the internal layout of Mytre Court to the rear and a Daylight and Sunlight

assessment to the correct BRE methodology. The details show that the affected Mytre Court properties only have small kitchen, toilet or staircase windows on the rear elevation facing the site. The kitchens are small non-habitable/galley kitchens which are not tested for BRE purposes. The BRE report demonstrates that the proposed extension would not result in any materially harmful impacts on neighbouring windows to Mytre Court or on the southern elevation of the Roger Street wing of the building in terms of loss of daylight or sunlight. Considering the scale of the extension, its position at roof (8<sup>th</sup> floor) level, and the distance to neighbouring windows it is also not considered that the extension would impact on these properties in terms of loss of outlook or increased enclosure.

5.4 In relation to other properties in the area. It is not considered that the development would impact on the amenity of the building to the north at 1 Doughty Street. The extension would be located further away from this property at a distance of approximately 15m. This is also a 4 storey townhouse and the proposed extension at (8<sup>th</sup> floor) level would be significantly higher than the roof level of this property and be setback from the north elevation. In this context it is not considered that the proposed roof extension would result in a material loss of daylight or sunlight to this neighbouring property. The difference in height and steep angle of vision between the roof extension (at 8th floor) and the top floor of this adjacent 4 storey property would also prevent overlooking. The other nearby properties at 1a Doughty Mews, 20 John Street and 62 Doughty Street are sited over 21m away and due to this relationship, these properties would not be impacted by the development. The adjacent property to the south at 21a John Street is in commercial use and would also not be impacted. However, the proposed side facing window (next to the external stair core) would need to be obscurely glazed and fixed shut to prevent any overlooking of that site. Had the development been otherwise acceptable, a condition would be required. The proposed roof terrace would also not result in overlooking of these neighbouring properties, subject to necessary landscaping details.

## 6. Transport

### *Car free development*

6.1 The site is located in a controlled parking zone and has a PTAL rating of 6a (excellent) which means it is highly accessible by public transport. In accordance with Policy T2 (Parking and car-free development) the Council will limit the availability of parking and will require all new developments in the borough to be car-free. The Council will not issue on-street parking permits in connection with new developments and will use a s.106 legal agreement to ensure that future occupants are aware that they are not entitled to on-street parking permits. Had the development been acceptable in all other respects the proposed flat would have been secured as a car free via a s.106 legal agreement. As the application is to be refused on other grounds, the absence of a car agreement is cited as a reason for refusal

### *Construction management*

6.2 Policies A1 and T4 state that Construction Management Plans should be secured to demonstrate how a development will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). For some developments, this may require control over how the development is implemented (including demolition and construction) through a Construction Management Plan (CMP). CMPs can be required where developments have poor or limited access on site. A CMP is not required for this small scale development. However, details of how materials would be transferred between the highway and roof level (and vice versa) would have been required by planning condition/informative if the development was considered to be acceptable.

### *Highway works*

6.3 Policy A1 of the Camden Local Plan states that the Council will repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links, road and footway surfaces. However, the Council will not need to secure a highway contribution for this small

scale development.

### *Cycle parking*

6.4 Policy T1 of the new Camden Local Plan requires development to provide cycle parking facilities in accordance with the minimum requirements of the London Plan and the design requirements outlined in CPG7. The residential development requires 1 covered, secure and fully enclosed cycle parking space required as per policy T1. The use of the existing bicycle store at ground floor level as shown in the submitted application would be acceptable. This appears to have capacity for at least 2 extra bicycles as it has 16 spaces for 7 flats.

## 7. Energy & Sustainability

7.1 Local Plan Policy CC1 states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. All new residential development is required to demonstrate a 19% CO2 reduction below Part L 2013 Building Regulations demonstrating how the energy hierarchy has been applied to make the fullest contribution to CO2 reduction.

7.2 The application has been submitted with an Energy Statement. The development proposes on-site renewable energy and energy efficiency measures including high performance building fabric and energy efficient lighting, services and equipment; passive design measures to reduce energy demand for heating, cooling, ventilation and lighting; and photovoltaics at roof level to offset the site's electricity demand. Energy modelling has been undertaken the results of which demonstrate that a carbon saving >20% below Part L 2013 is feasible. Although the requirements of policy CC1 have been met the Council would not support photovoltaics on this building due to the heritage constraints of the listed building and conservation area. It would also be necessary to demonstrate that any energy efficient windows provide a satisfactory design which is suitable for the listed building. Therefore had the development been otherwise acceptable, full technical details of proposed energy efficiency and renewable energy measures would have been secured by planning condition.

## 8. Air Quality

8.1 Policy CC4 states that the Council will ensure that exposure to poor air quality is reduced in the borough. The Council will take into account the impact of air quality when assessing development proposals, through the consideration of the exposure of occupants to air pollution. The Council requires a basic air quality assessment for all newly erected buildings/substantial refurbishments and changes of use where occupants will be exposed to poor air quality (due to its location next to a busy road, diesel railway line or in a generally congested area).

8.2 The site is located in an area which exceeds poor air quality limits and the development has not been submitted with any details of air quality mitigation measures contrary to policy CC4. Had the development been otherwise acceptable, details of air quality and suitable mitigation for the development would have been required by planning condition.

## 9. Conclusion

9.1 Overall, the development has been assessed by the Council and is considered to be unacceptable. The design of the proposed roof extensions would result in unacceptable harm to the significance of the listed building, the setting of adjacent listed buildings and the character of the conservation area. The development would also need to be mitigated by car-free secured by legal agreement. The absence of an agreement to secure this would warrant a further reason for refusal.

## 10. Recommendation

10.1 Refuse planning permission and listed building consent.

## 11. Reasons for Refusal

### *Planning Permission*

1. The proposed roof extension by reason of its height, massing, scale, design and position at roof level would be a visually prominent and incongruous addition to the building, which would not relate well to the height, scale and architectural composition of the listed building, the consistent scale of the adjacent listed townhouses and the identified conservation area views. As a result the development would harm the architectural interest of the Grade II Listed Building, the setting of adjacent Listed terraces on John Street and Doughty Street and the character and appearance of the Bloomsbury Conservation Area contrary to Policies D1 (Design), D2 (Heritage) of the Camden Local Plan (2017).

2. In the absence of a legal agreement to secure car free housing the development would fail to encourage car free lifestyles, promote sustainable ways of travelling, help to reduce the impact of traffic and would increase the demand for on-street parking in the CPZ contrary to Policy T2 (Parking and car-free development) of the Camden Local Plan 2017.

### *Listed Building Consent*

1. The proposed roof extension by reason of its height, massing, scale, design and position at roof level would be a visually prominent and incongruous addition to the building, which would not relate well to the height, scale and architectural composition of the listed building and the consistent scale of the adjacent listed townhouses. As a result the development would harm the architectural interest of the Grade II Listed Building and the setting of adjacent Listed terraces on John Street and Doughty Street contrary to Policies D1 (Design), D2 (Heritage) of the Camden Local Plan (2017).