1963-66 OS Map

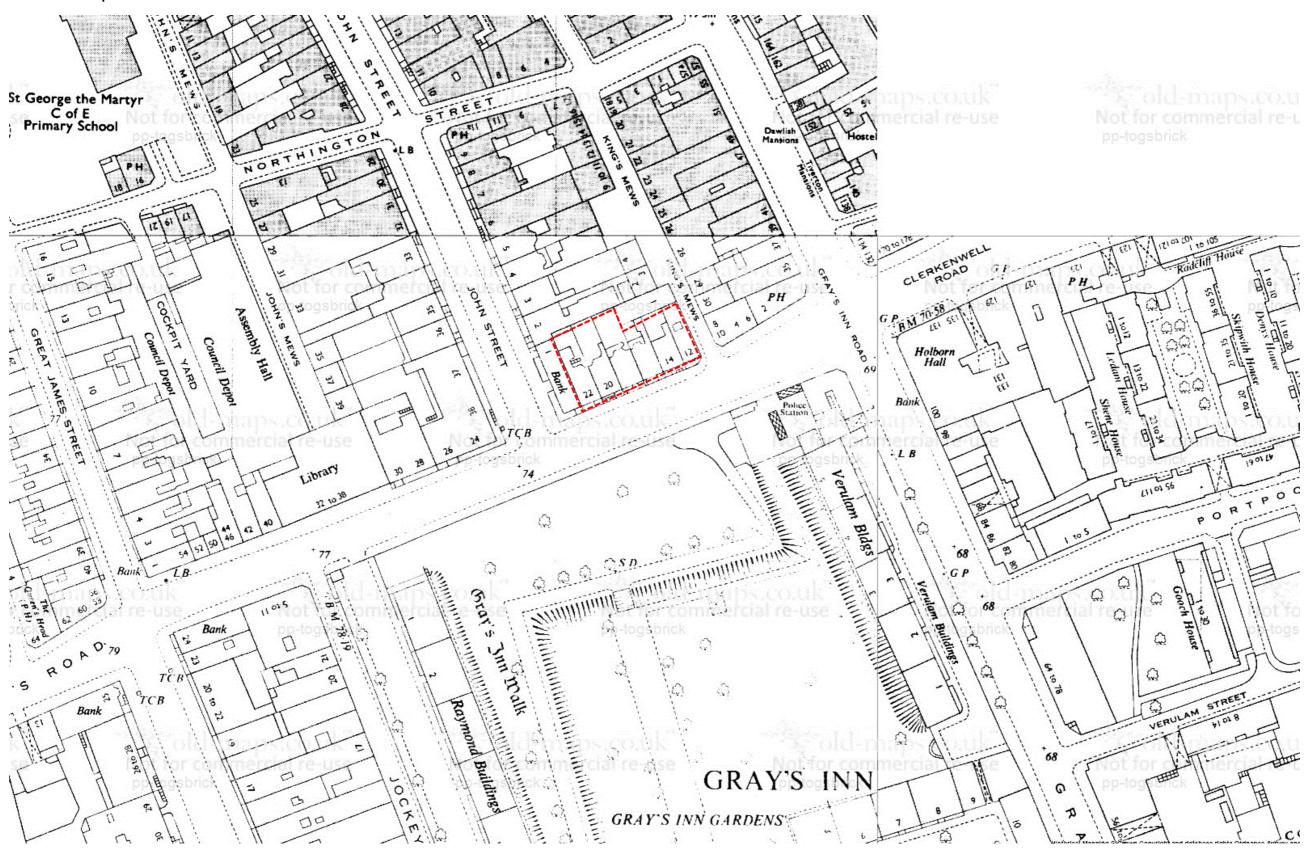


Figure 8: The 1963-66 OS Map shows the extent of post-war reconstruction in the area with the building of the library and other buildings west of the subject site.

1973 OS Map CLERKENWELL 121 Assembly Hall Council Depot Holborn Hall 69 The state of the s Library آلتنت تتنتاك ۱۱۵۷۶۵ PORTPO Millimining of Balk Q0 Bank VERULAM STREET CB

Figure 9: The 1973 OS map is largely similar to the previous map of 1963-66.

Stephen Levrant Heritage Architecture **11** | Page

Contemporary OS Map



Figure 10: The contemporary OS map shows a largely unchanged layout from the previous map.

1

Date: 26/09/2018
Our ref: 2018/3862/PRE
Contact: John Diver
Direct line: 020 7974 6368
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Nick Delaney Daniel Watney LLP 165 Fleet Street London EC4A 2DW By email



2nd Floor 5 Pancras Square London N1C 4AG

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Dear Nick,

Re: 12 - 22 Theobald's Road, London, WC1X 8PL

Thank you for the pre-application meeting and site visit held on site on the 28 August 2018. This meeting was held to discuss the overarching approach to the planning refurbishments of the listed buildings as well as partial changes of use /varied permissions to nos.20/22. The entire row is GII listed and is situated within the Bloomsbury Conservation Area.

The works proposed to the properties is summarised as follows:

Alterations and refurbishment to terrace of six GII listed former townhouses. Internal works: (no12-18) internal refurbishment for continued office use and alterations to internal partitions; (no20) conversion from HMO into three self-contained flats; (no.22) conversion of basement from office to self-contained flat and minor alteration to approved works at upper floors. External works including refurbishment of front and rear light well. Repaired entrance ways and new signage.

1. Attendees

- 1.1. The following members from the LB Camden PPA project team attended the meeting:
 - John Diver (Senior Planning Officer)
 - Colette Hatton (Conservation Officer)
- 1.2. Further to the above, representatives of the following project teams were also present:
 - Nick Delaney (Daniel Watney LLP)
 - Thirdway Architects
 - · Stephen Levrant Heritage Architecture

2. Meeting points for discussion

- 2.1. The following made up the chief points for discussion during the meeting:
 - Full site walk around to explore affected areas
 - Discussion of site constraints and special interest of property
 - Outline of design approach to listed building works
 - Outline of planning considerations
 - Initial review from LPA officers
- 2.2. Having now had the chance to review your submission in further detail, the response from officers is set out below. In order to expedite the issuing of the note, detailed comments will

2

not be provided at this stage in terms of the exact specifications of internal works. Instead advice will focus on the design approach taken to date and, where relevant, any areas of concern highlighted. Please note that as opening up works are yet to be completed, certain elements (such as impact to joinery and flooring) are subject to change as a result of further information / changes required to the scheme.

3. Discussions / advice

General feedback

- 3.1. During the visit, it was clear to officers that the existing buildings have suffered from neglect or mismanagement over the years. Nos.12-18 have been refurbished for continued office use which has led to various original features being lost, or unsympathetic openings or additions being added. Nos.20 and 22 have also been subject to a number of harmful internal works due to their use as HMO accommodation, which have harmed the buildings' internal significance. As such, the fact that the row of buildings has now come under a single ownership, and that your client is looking to invest in the building's long term is of great reassurance to the Council.
- 3.2. Overall it should be noted that the quality of the pre-application reporting submitted is considered to represent a very high standard which has appropriately considered the areas of significance to each building and applied a scholarly approach to inform a proposed scheme of sensitive refurbishment. Officers are therefore generally supportive of the proposed works due to the various heritage benefits to be delivered. We do however maintain some areas of concern with the proposed development, which will be discussed below based upon the relative sections of the site:

No.22 (variation to consented works)

- 3.3. Planning permission and listed building consent was recently granted for the conversion of the upper floors of no.22 (GF loft) from HMO accommodation to form three self-contained flats (2016/3278/L & 2016/2284/P). These permissions were heavily justified by the significant heritage benefits of the removal of non-original partitions and features which had led to a loss of plan form as well as the general refurbishments works to bring the property back to its former glory. The plan form of the approved units included no significant divergence from original plan form. During the visit it was noted that works to implement this consent have begun on site. Advice is now sought for a variation to the approved listed building consent to include WC and kitchen within installed 'pods' to the principle rooms, allowing the second room to be used as a bedroom. There would be no need for further planning permission for this change.
- 3.4. As a general rule officers tend to be wary of such pod solutions as, although potentially reversible, they would still impact upon the sense of grandeur, proportions and plan form of the principal rooms of the listed building. That said, officers accept that the installation of WC's and fitted kitchens within these spaces would likely make the resulting units far more commercially attractive / viable and the heritage benefits delivered by the consented works are significant. While we still raise caution about this approach, if fully demonstrated that the use of such pod solutions would be fully reversible, of high quality, and not require significant intervention into historic fabric they may, on balance, be supported in this instance. It is recommended that such works are fully justified with detail upfront within a formal submission.

No.22 Change of use of basement from office to self-contained flat

Stephen Levrant Heritage Architecture 13 | Page

3

- 3.5. While the previous application related to upper floor only, advice is now sought for the conversion of the basement floor too which is currently the main access to the lower ground floor office accommodation to the rear wing behind the terrace. In accordance with policy E2 (Employment sites), the Council would only accept the loss of business premise non-business use where is shown that: "a) the site or building is no longer suitable for its existing business use; and b) that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time". In consideration of whether the loss of employment floorspace would be accepted, the Council will need to consider whether there is potential for that use to continue on site. A number of criteria for this assessment are given at para.5.37 of the Local Plan which include:
 - the suitability of the location for any business use:
 - whether the premises are in a reasonable condition to allow the use to continue;
 - · the range of unit sizes it provides, particularly suitability for small businesses; and
 - · whether the business use is well related to nearby land uses.
- 3.6. It is noted that the basement to no.22 acts primarily as circulation space and rooms ancillary to the office use which would become redundant if a stair were to be installed within the modern rear wing itself. It is noted that the basement to no.22 in itself would not offer much range of unit size under an independent use and its internal standard is lacking (for instance with poor natural light). Given the overall package of works proposed and quality of the low existing space, it may in this instance be possible to justify the minor loss of office floorspace in this location on the basis of the delivery of a significant quantum of high quality office floor space within rest of the scheme (nos.12-18). This would however require full justification within formal submission documents in line with the above policy requirements. Further guidance on this matter can also be found in the Camden planning guidance document on town centres, retail and employment (2018).
- 3.7. Notwithstanding the above, it should be noted that concerns are raised as to the resulting standard of accommodation for future occupiers via this proposed lower ground floor conversion. Policy D1 seek to ensure that all new housing is design to provide a high standard of accommodation, this would include factors such as levels of natural light, outlook, noise and disturbance and privacy. Given the siting of this unit, we question whether the resulting unit would receive adequate levels of natural light as well as whether the relationship with the adjacent office use to the rear wing /lightwell would be appropriate in terms of noise and privacy. The Council would not support this element unless the above land use and amenity matters are fully addressed. This would likely require the submission of a daylight / sunlight report for this new unit.

Change of use of no.20 from HMO to self-contained flats

3.8. The works proposed at no.20 would require both planning and listed building consent and the scheme submitted for comment is very similar to that which was recently approved next door at no.22. The context to the works is also very similar, with the property having been subdivided into small HMO units of very poor standard which would not comply with modern housing regulations. The removal of partitions and unsympathetic additions, and the restoration of the historic features to this property is welcomed by officers and would be considered a significant heritage benefit for the site. Despite its recent use, the property still features a large number of original features and these should be sensitively restored. The loss of HMO accommodation would unlikely be resisted in this instance despite a general presumption for the retention of this form of housing under policy H10 (Housing with shared facilities). This is due to the very poor standard of accommodation within the property as well as the significant heritage benefits to be derived from reverting the listed building into a C3 use.

4

3.9. These properties were built as single family dwellings, and whilst it is understood that reverting to a SFD is not a realistic option, converting the property back into self-contained housing with plan forms more closely aligned with the original form would be a heritage benefit for the building. As with the adjacent no.22, we would expect full method statements for the repair and reinstatement works and the use of pod style WC's would be assessed in the same manner as outline above. As with no.22, the level of internal partitions would also need to be kept to as close to original plan form as possible. It should also be noted that the same concerns in terms of the resulting standard of amenity for a lower ground floor unit would apply to this property too, particularly as the relationship with the rear lightwell (for office use) would be even worse in privacy terms.

Nos.12-18 (Refurbishments)

3.10. Officers are generally supportive of the approach to refurbishment works proposed to this part of the site. It is noted that the detailing of floor build-up to level internal rooms has yet to be detailed and that opening up investigation works are due to commencement shortly. However, the methodology set out within the submitted documents would remain in line with the Council's expectations and avoid the need for significant intervention (e.g. with approaches to flooring, doors and joinery). The re-laying of tiles to the rear courtyard would be supported as the existing flooring is not historic or of significance. We would request however that patterning to the tiles or planters are used to indicate the historic boundary lines of properties along the terrace to reference its past.

Nos.12-18 (Servicing and mechanical vent)

- 3.11. The proposed scheme would include a full overhaul of the existing mechanical ventilation equipment, however, during the site visit the method for heating and cooling the refurbished building was yet to have been determined.
- 3.12. Policies CC1 and CC2 of the Local Plan seek to ensure that all development minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are viable during construction and occupation. These policies also seek to ensure that all development should adopt appropriate climate change adaptation measures including the need to reduce the impact of urban and dwelling overheating, such as the application of the cooling hierarchy.
- 3.13. Although the works would not include any uplift in floor area the property is to undergo a major refurbishment, with an overall area likely to be greater than 500sqm. If it is your intention for the entire building to be serviced via heating, cooling and ventilation equipment (HVAC), then it may be necessary to demonstrate that such provision complies with these policies via the submission of an Energy and Sustainability Statement. Should an Energy and Sustainability Statement be required, this should be submitted upfront with your application. You can find out more details of these report within our Sustainability SPG available on our website.
- 3.14. No matter what the scale, if the scheme were to include new or replacement external plant equipment then a Noise Impact Assessment (NIA) would be required to demonstrate that such plant could operate within the Council's acceptable noise thresholds in line with policy A4 (noise and vibration). These thresholds are set out within Appendix two of the Local Plan. The NIA should be completed in line with British Standard 4142:2014 and should evidence that the use of the plant would not result in disturbances to surrounding occupiers.

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. 5

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
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12-22 Theobalds Road, London WC1: Appendices to Heritage Statement

Appendix 4- Morphological Drawings

APPENDIX 4- MORPHOLOGICAL DRAWINGS FOR NUMBER 22

The following morphological plans are based on tentative assumptions, informed by visual surveys of the site and the limited archive research available for the building in question. Only limited 20th century plans have been found and no original plans. Only the main structure has been assessed - internal features have not been included in this study.



Figure 12: Morphological drawing of number 22 Theobalds Road. All external and party walls are original. The spine walls and other partitions (as indicated) are also thought to be original however there is a lack of archive evidence to confirm this. All windows on the front elevation have been replaced. It is assumed that these are mid 20th century, possibly required as a result of war damage. The rear windows are a mixture of originals and replacements, and require further investigation. Various internal alterations have been made throughout the 20th century, with partition walls added and altered, and additional bathroom facilities added.

APPENDIX 5- OPENING UP AND EXPLORATORY WORKS

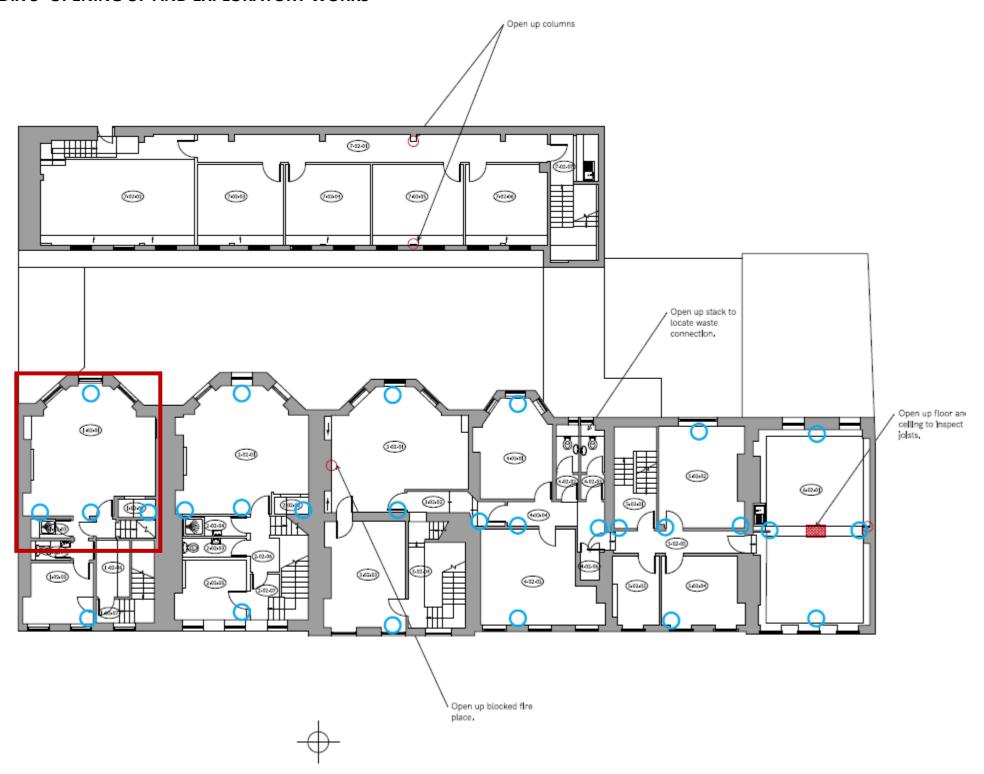


Figure 1: Number 22 - Second floor plan key showing location of opening up photographs

1-01-02





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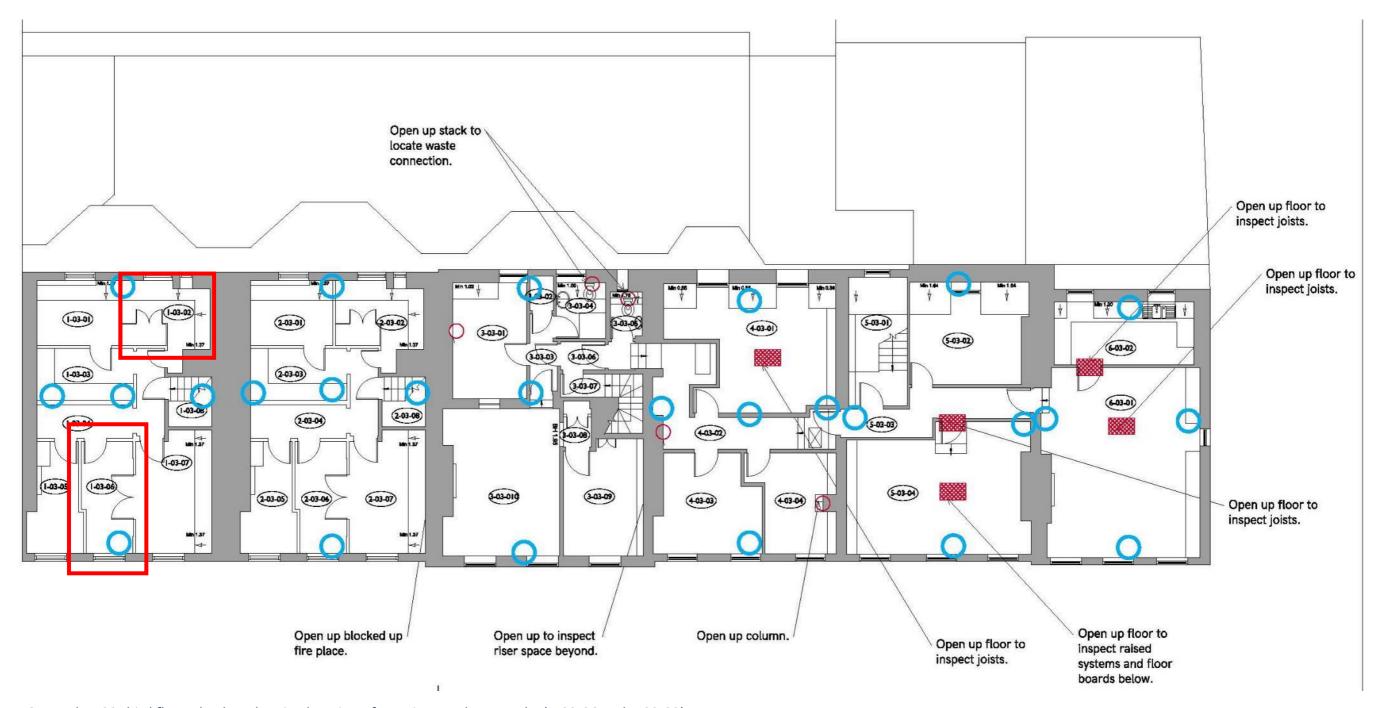


Figure 2: Number 22 third floor plan key showing location of opening up photographs (1-03-06 and 1-03-02)









