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Dear Bimal Ruparelia,

Re: Single story rear extension and extension in depth of existing closet wing to no. 110, replacement of all windows with double glazing, replacement of pitch roof with flat roof of basement entrance to no. 109, and various internal alterations in relation to existing HMO.

Thank you for submitting a pre-planning application enquiry which was received on 11.05.2018 together with the required fee of £2,472.52 which was received on the 30.05.2018. This advice is formulated based on the information submitted, previous planning history, meeting to the Council's offices, as well as site visit as part of the previous planning application 2017/2553/P and associated listed building consent application 2017/4648/L, which have been withdrawn.

The applicant was informed at the office meeting about the acceptability of the scheme. The current written advice details the reasoning.

1. Proposal

1.1 The applicant wishes to receive the Council's view on:

External alterations:

- Single storey ground floor rear extension to the rear of no. 110 Guilford Street (to match no. 109)
- Extension to rear closet wing at no. 110 Guilford Street at first floor level
- Proposed flat roof to the basement entrance at no. 109 to front elevation
- Replacement of all existing timber sash windows with double glazed timber sash windows on both buildings

Internal alterations:

- Inclusion of en-suite bathrooms on all floors within both buildings

- Creation of communal kitchens on ground floor of nos. 109 & 110 Guilford Street
- Demolition of non-original partition walls
- Rearrangement doors

2. Site description

2.1 The application site comprises two five-storey buildings, including basement and loft level, located on the northern side of Guilford Street, close to the junction with Gray's Inn Road. The site lies within Bloomsbury Conservation Area, and the buildings are part of a Grade II listed terrace row including nos. 105 to 110 and their attached railings.

2.2 Both buildings have been altered through time, however their external appearance as well as a significant part of the internal layout and fabric hold historic value. The property at no. 109 has been previously extended with a single storey rear extension, which infills fully the rear of the property. Both buildings appear to have been converted into student accommodation a number of years ago, with a total of 20 bedrooms, 4 communal kitchens, communal bathroom facilities and laundry room currently existing between the two properties.

3. Relevant planning history

3.1 Planning history shows previous records of alterations at the site, however these are not particularly relevant to the current proposal. Two of these records are listed below.

8600643 - 109 Guilford Street - Rebuilding of ground floor rear extension to form new dining room as shown on drawing number 1067/2A revised by letter dated 19th June 1986. – Granted 31/07/1986

8670125 – 109 Guilford Street - Internal alterations to provide bathrooms ensuite with rooms. Demolition and rebuilding of ground floor rear extension to form new dining room as shown on drawing number 1067/2A revised by letter dated 19th June 1986. – Granted Listed building consent 31/07/1986

9000333 – 110 Guilford Street - Change of use from residential to hotel use and associated works of alteration as shown on drawing numbers 8951/21 22 23 24 25 & 26. – Refused – 11/12/1990

9070127 - 110 Guilford Street - Internal alterations and refurbishment involving change of use from residential to hotel use as shown on drawing numbers 8951/21 22 23 24 25 and 26. - Refused 11/12/1990

4. **Relevant policies and guidance**

4.1 The relevant policies that would apply to this proposal are Camden Local Plan 2017, Camden Planning Guidance, The London Plan 2016 and the NPPF 2012. The following policies will be taken into consideration:

- **National Planning Policy Framework (2012)**
- **London Plan (2016)**
 - Policy 7.4 – Local Character
 - Policy 7.6 – Architecture
- **Camden Local Plan 2017**
 - Policy G1 Delivery and location of growth
 - Policy D1 Design
 - Policy D2 Heritage
 - Policy A1 Managing the impact of development
 - Policy H9 Student housing
 - Policy H10 Housing with shared facilities ('houses in multiple occupation')
 - Policy T1 Prioritising walking, cycling and public transport
 - Policy T2 Parking and car-free development
- **LDF Supplementary Guidance**
 - CPG 1 – Design 2015 updated March 2018
 - CPG 2 – Housing 2016 updated March 2018
 - CPG 6 – Amenity 2011 updated March 2018
 - CPG 7 – Transport 2011
 - CPG 8 – Planning Obligations 2015 updated March 2018
- **Bloomsbury Conservation Area Appraisal and Management Strategy 2011**

4.2 The Council is reviewing and updating its Camden Planning Guidance documents to support the delivery of the Camden Local Plan following its adoption in summer 2017. The update is being carried out in two phases to manage the amount of material to be consulted on at any one time and ensure that relevant revised CPG documents take into account the emerging London Plan and changes to national planning policy due in early 2018. Please refer to the Council's website for further [details](#).

5. **Assessment**

5.1 The main issues to consider in this case are as follows:

- Land use and quality of accommodation
- Design and Heritage
- Neighbouring amenity

- Transport and planning obligations – car -free

Land use

- 5.2 Under policy H10, the Council aims to ensure that there is a continued provision of housing with shared facilities to meet the needs of small households with limited income and modest space requirements. Furthermore, the Councils aims to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions.
- 6.1 Both buildings are currently in use as housing with shared facilities designated for students and the proposal would retain this use, and benefit from HMO licencing. The property at no. 109 has 9 units with floor areas varying from 9.3sqm to 22sqm, with two shared kitchens one at basement level and one on the second floor. It also includes shared bathroom in the basement and shared shower room on the second floor, with 7 rooms benefiting from ensuite bathrooms. The HMO licencing requirements state that the maximum permitted number for this property is 10 people as determined by the kitchen facilities (one kitchen can only serve a maximum of five people).
- 6.2 The property at no. 110 has 11 units with floor areas varying from 11.3sqm to 20.5sqm, with two shared kitchens one in the basement and one on the second floor. It also includes three shared bathrooms, two on the ground floor and 1 on the third floor, plus another small toilet on the first floor. The HMO licencing requirements state that the maximum permitted number for this property is 15 as determined by WC/bathing and kitchen facilities.
- 6.3 The proposed alterations and extensions are aimed at retaining the HMO use for student accommodation, add another unit at no. 109 and maintain the ones at no. 110 and provide an overall refurbishment of both buildings in order to upgrade the quality of accommodation, bringing it to modern standards. It is therefore considered that the continuation of the HMO use as a student accommodation would be likely to be supported by officers in the event of a future planning application.

Quality of accommodation

- 6.4 The Council's Environmental Health Officer (Private Housing) has reviewed the proposals and considers that each unit would be only suitable for one person as there are only 2 kitchens proposed, as kitchen facilities are required on a 1:5 basis. Considerable concerns were raised in relation to the proposed design of the rear extension at no. 110 as it would not allow sufficient levels of outlook and light. You are therefore advised that you should revise the design of the proposed single storey rear extension at no. 110. More detailed advice in relation to this can be found below.
- 6.5 Following the introduction of en-suites in rooms you should consider the remaining floorspace to be in line with the National Space Standard Requirements for single bedroom. The drawings submitted show in some of the rooms double beds, which would not allow the occupation of two persons as required by HMO licencing.

- 6.6 You are encouraged to review Housing Act 2004 which provides guidance on minimum standards for HMOs and student housing which is not provided by an educational institution.

Design and heritage

- 6.7 Sustaining the HMO in use and upgrading its facilities can represent a very modest degree of public benefit which could balance a small amount of harm by meeting the Borough's other planning policies and ensuring sustainable residential use for buildings without internal subdivision; however, otherwise the harm involved in subdividing the volumes of the main rooms and obscuring original plan form by creation of the proposed pod en suites has to be, in each case balanced by some heritage benefits such as removal of harmful elements.
- 6.8 You should be aware that it is also important in principle that any harm proposed is the minimum necessary and cannot otherwise be avoided within the scope of the same essential development objectives at the site.

External alterations

Rear extensions

- 6.9 The building at no. 110 benefits from single storey rear extensions with a small outdoor space of 11.9sqm. The space is bordered on one side by the existing infill extension at no. 109 and on the other side by a high wall which is part of the ground and first floor extensions at no. 111 Guilford Street. The proposal includes demolition of the existing later rear extensions and the infill of the plot with a rear extension. The building has a small rear closet wing at first floor level which is proposed to be extended as well.
- 6.10 You are advised that the proposed reconfiguration of the closet wing at first floor level at no. 110 would be acceptable subject to selection of good quality matching stock brick and mortar, and a suitable traditional window.
- 6.11 The demolition of existing ground floor structures at no. 110 would be considered acceptable, as they are a later addition which hold limited design and historic value, and their removal would not harm the special interest of the listed building. You are advised that a ground floor rear extension in this location should include retention of a lightwell articulating the separation between the historic rear elevation and the proposed extension, allowing appreciation of the extent of the historic house and its rear façade. The opportunity to read and appreciate the historic rear elevation is also a positive attribute of the existing yard at no. 110 that would be lost under the proposals.
- 6.12 As such, insofar as their basic form and extent as proposed is acceptable in planning terms, consideration should be given to the provision of rooflights arranged to articulate the gap between the historic rear elevation and the extension, and ideally to allow an adequate level of outlook too. Such rooflights should be designed as part of an integrated and high-quality roof form and finish, in either a traditional or modern style.

Front basement entrance alterations

- 6.13 The proposed alterations to the front entrance at the basement level include replacement of existing pitched tiled roof with flat roof to match no. 108 Guilford Street. It is noted that the proposed plans do not actually show in existing and proposed elevations and how this proposal would affect the appearance of the host building. In the event of a future planning application you should include detailed drawings with this element of the proposal.
- 6.14 When assessing the existing views along the street, a flat roof in this location would not be considered the most appropriate. The closest historic design can be seen at nos. 105 and 106, which has a flush under-bridge entrance. As such, if you are minded to propose alterations to this section of the building, you are advised that the lobby entrance should be set back from the edge of the front-door bridge, in order to be read as a later infill.
- 6.15 However, the proposed replacement of the tiled roof is not considered to be justified as the existing roof is considered to have historic value and interest to the host building and streetscene.

Windows replacement

- 6.16 Both buildings have single glazed timber sash windows. The proposal includes replacement of all windows with double glazed, whilst retaining the fenestration details timber frames.
- 6.17 As discussed in meetings, any proposals for replacement of existing windows should be fully justified in the application with photographic evidence and by reference to the condition of the existing fabric, as well as with detailed product specification and plan, section and elevation drawings showing how they match historic glazing in proportions and details. You are advised however, that double glazing would not be supported in the event of a future planning application.

Internal alterations

Kitchens

- 6.18 The proposed location of the kitchens may be acceptable, subject to the submission of detailed plans and section drawings indicating how and where the servicing will run at ground floor and second floor levels, in the event of a future planning application. Careful consideration should be given to the historic fabric, as no harm should be caused by fixing into historic joinery, nor by running pipework or ducts through floor or ceiling structures. You are advised that cooker extract hoods would not be acceptable. All the alterations to existing fabric connected with the kitchens should be clearly indicated on plan and section drawings.
- 6.19 You are advised that when proposing the interior layout of the kitchens, the interface of fixed kitchen structures at ground floor level with principal windows on the front elevation needs to be carefully considered to allow for clear views in from the street.

Pod ensembles

- 6.20 Noting the obligation to avoid all unnecessary harm discussed above, the proposed plans show that the scheme's objective is to provide adequate upgraded bathroom facilities for all occupiers, and not necessarily to provide these all within private rooms. In this instance, in the proposed first-floor arrangement at 110 Guilford Street, harm would arise from the provision of an en-suite pod abutting the chimney breast in Unit 6, and the opportunity to reverse the harm caused by the existing partition wall between Units 5 and 6 – through removing it – would not be realised. Since the bathroom to be provided in the rear closet wing at this level is not private, justification must be provided for the proposed harmful arrangement. Unit 6 could alternatively be served either by use of the closet wing bathroom, or by conversion of the room proposed to be occupied by Unit 5 as an en-suite (notwithstanding that this latter configuration may present a challenge for accommodation of pipework and services).
- 6.21 In the event of a future planning application, the submission should include full details of the pods' ventilation system and of the risers needed for servicing. Chimneybreasts can often usefully be used to contain vertical risers without harmful loss of fabric or reengineering of floor structures or the addition of trunking over decorative detailing, but this only applies where no harm would be caused to the visible form or significant harm to the fabric of the chimneybreast itself. As such, you are advised to consider in your future proposal the use of chimneybreasts as risers for servicing.
- 6.22 Please note that it is also important in order to reinstate appreciation of the original designed proportions and volumes of the rooms that the proposed en-suite pods sit clear of the chimneybreasts as far as possible. You are therefore advised that before submitting a new planning application, you should investigate further the existing fabric around the chimneybreasts, including careful opening up works.

Other observations

- 6.23 At second floor level of both houses, the doors beside the secondary stairs should be retained in place (and fixed shut, in the case of no. 109, even if the linings for the enclosed en-suite bathroom need to cover over its inner face), rather than removed, as they are important for maintaining the traditional historic enclosure of the stair compartment.

Amenity

- 6.24 The proposed external extensions and alterations, due to their position, bulk, scale and detailed design are not considered to cause significant harm to the amenity of neighbouring occupiers.
- 6.25 Further considerations of amenity issues will be assessed throughout the process of the application, taking into account any correspondence which is received during consultation process.

Transport and planning obligations

- 6.26 Due to the application's site location, the proposed scheme may be subject to a construction management plan to be secured via a section 106 legal agreement. In the event of a future planning application, you are advised to visit Camden's website [here](#), which details the CMP requirements. At the application submission stage you should include the CMP pro-forma completed and transport officers would be able to assess it and determine if a CMP would be required via the agreement in this instance.
- 6.27 In line with policy T1, you should consider provision of cycle parking within the application sites. It is acknowledged that due to the historic fabric and plan from this may be difficult to be achieved, however you are encouraged to look at possible solutions.
- 6.28 In the event of an acceptable scheme under a future planning application, the scheme would be car-free development secured via the s106 legal agreement in line with policy T2.

Other matters

- 6.29 Please note that the demolition plans submitted are not accurate, as they still should show partition walls being retained, particularly around en-suites, whereas they appear to be totally replaced with the proposed pod en-suites.
- 6.30 At the ground floor level, walls to be removed as shown on the proposed drawings are not shown for demolition. Demolition plans should show all fabric that is to be removed, whether it is replaced in the same position or not.

7 Conclusions

7.1 In relation to external alterations:

- Please note that the proposed ground floor extension at no. 110 would not be acceptable in its current form due to the lack of outlook and poor level of daylight and sunlight. The extension should incorporate a larger lightwell abutting the historic rear elevation of the host building and also allow sufficient levels of outlook and light. The proposed
- The proposed extension of the existing closet wing would be acceptable subject to careful choice of materials to match existing.
- The proposed replacement of windows with double glazed would not be supported by officers.

7.2 In relation to internal alterations:

- The proposed kitchens would have to be supported by detailed drawings for servicing which show that no significant harm would be caused to the historic fabric.
- The pod en-suites would be considered acceptable within the units where no unnecessary harm would be caused, subject to details on their ventilation system and of the risers needed for servicing.

8 Planning application information

8.1 If the applicant is minded to put forward a planning application, regardless of the advice of this pre-application, in order to ensure the application is valid, the following information will be required to support the planning application:

- Completed and signed planning application forms for Full Planning Permission and Listed Building Consent Application;
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red;
- Floor plans and elevations at a scale of 1:50 labelled 'existing' and 'proposed';
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Design and Access Statement;
- Heritage Statement;
- The appropriate fee;

In addition to the above, the following elements/details should be included within any formal application:

- Service routes and risers to show change and any impact upon historic fabric
- Cornice, skirting details
- Details of ceilings repairs if any
- Flooring details
- Build up plan for flooring (if required)
- Details of all new materials – including samples
- Full details of fireplaces
- Joinery for new door and new windows
- Details of window screens or secondary glazing (if required)

8.2 We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by putting up a notice in close proximity of the application site. The Council must allow 24 days from the consultation start date for responses to be received.

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 Nora Constantinescu (0207 974 5758)

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

Yours sincerely,

Nora Constantinescu
Planning Officer - Planning Solutions Team