

# 2018/4338/P & 2018/4610/L 109 -110 Guilford Street

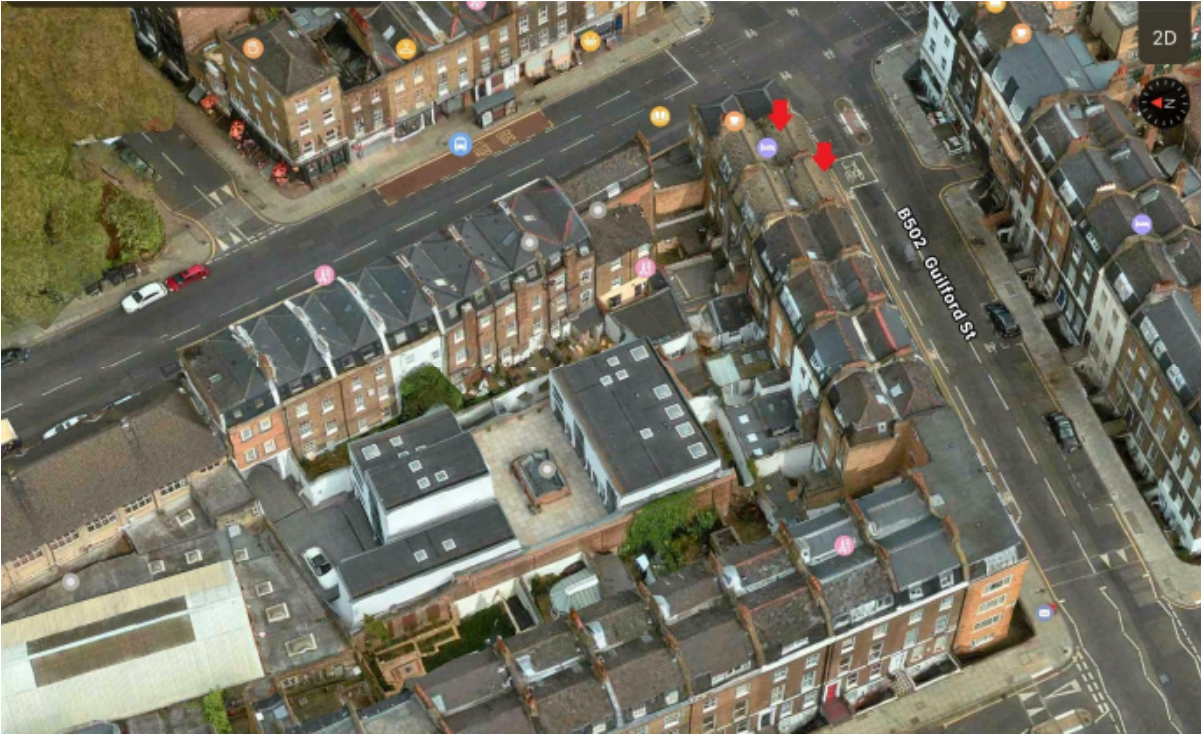


This material has been reproduced from Ordnance Survey digital map data with the permission of the controller of Her Majesty's Stationery Office, © Crown Copyright.

Site Photos

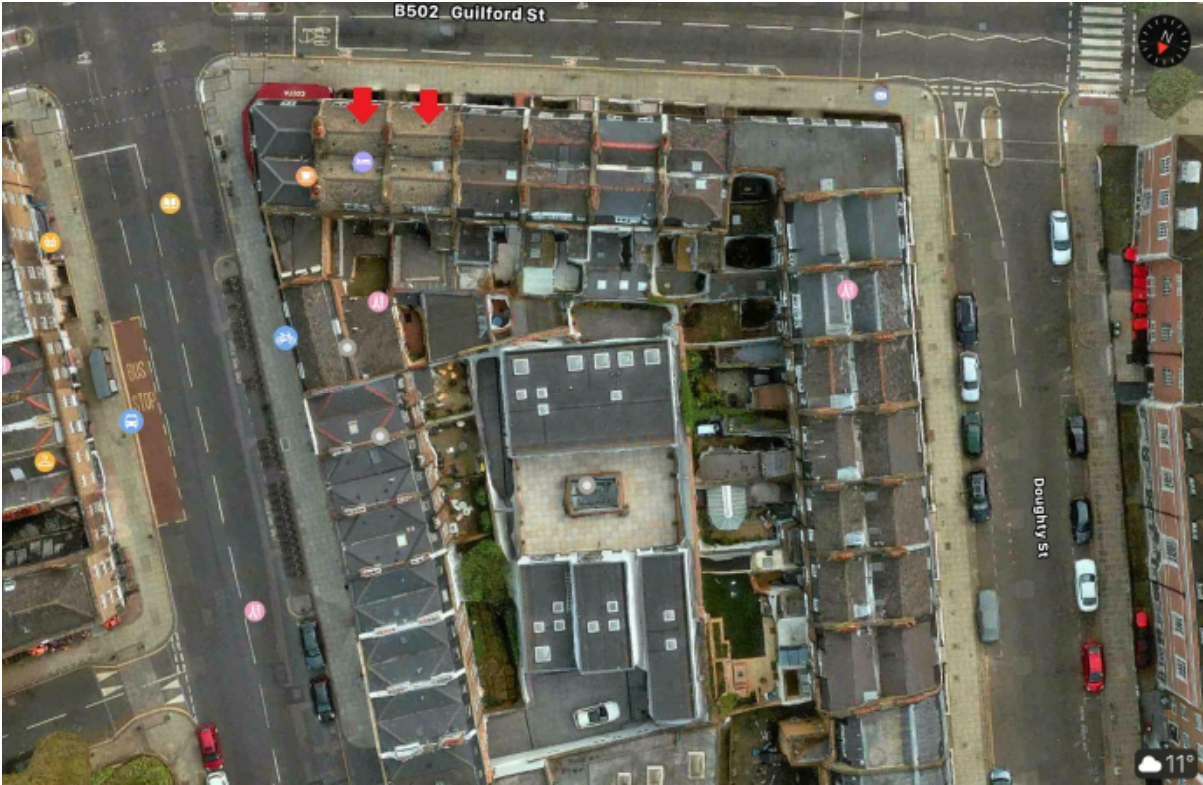


1. Aerial view



2. Aerial view





3. Aerial view



4. Existing rear elevation of no. 110



5. Existing rear elevation at no. 110 including the existing closet wing to be extended by 0.9m towards the rear.



6. View of rear courtyard at no. 110 from roof level; single storey rear structure to be partially demolished.



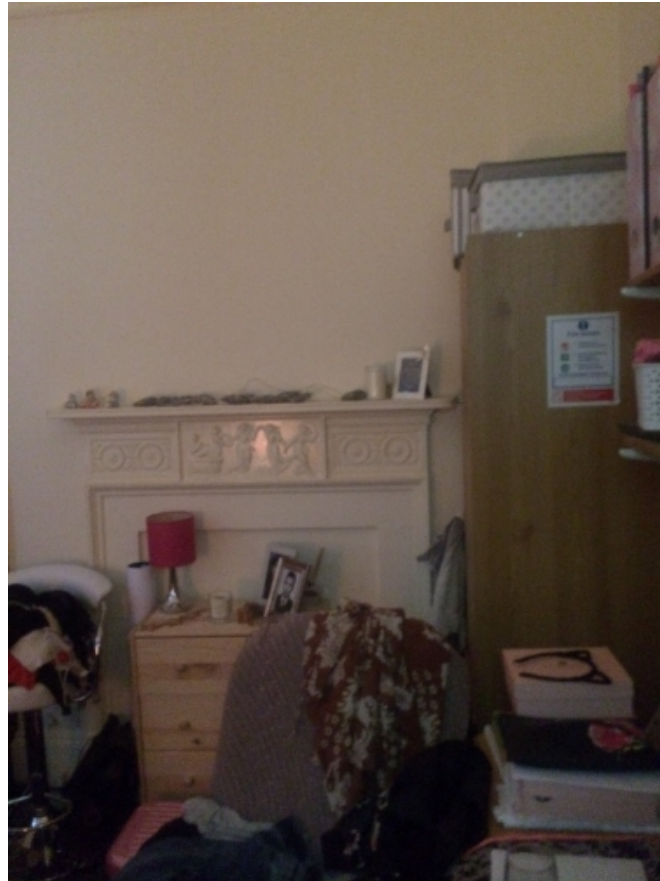


7. View from the rear courtyard at no. 110 to the first floor extension at no. 111 Guilford Street

Internal elements of interest:



8. Front ground floor room at no. 109 – partial view of the curved wall, door to be removed and wall to be made good to match existing; historic cornice – to be repaired and retained; fireplace to be retained.



9. Original fireplace at no. 109 ground floor rear room – to be retained.



10. Staircase detail at on. 109 – staircase to be repaired and retained.



11. Front ground floor room at no. 110 – partial view of the curved wall, sink to be removed and wall to be made good to match existing; cornice to be repaired and retained.

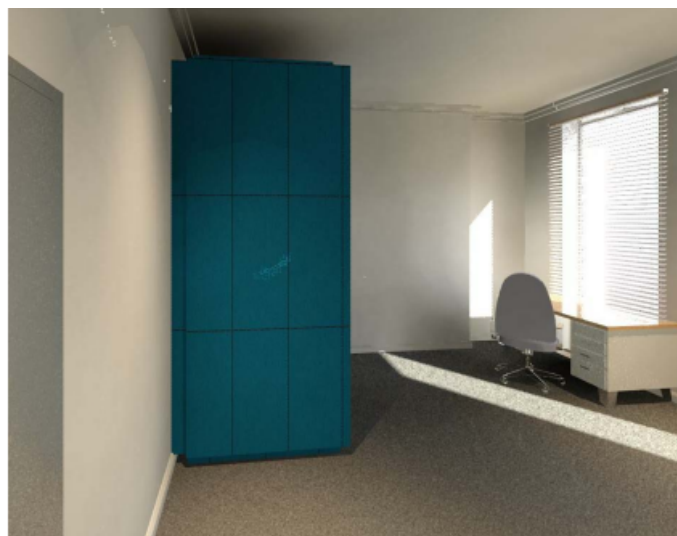
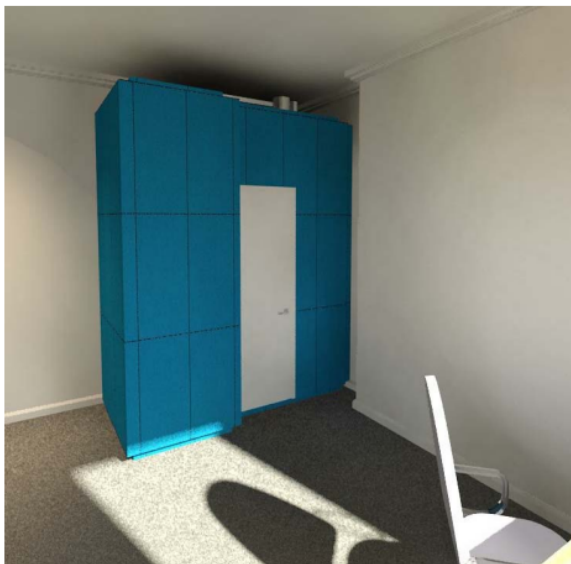


12. Existing partition walls to form entrance into rear room first floor at no. 109 – to be removed and plan form reinstated.





13. Existing pod en-suite in front room at no. 109



14. Proposed pod visual in Valchomat panelling



<b>Delegated Report</b>		<b>Analysis sheet</b>		<b>Expiry Date:</b>		<b>05/11/2018</b>	
<b>(Members Briefing)</b>		N/A		<b>Consultation Expiry Date:</b>		<b>28/10/2018</b>	
<b>Officer</b>				<b>Application Number(s)</b>			
Nora-Andreea Constantinescu				i. 2018/4338/P ii. 2018/4610/L			
<b>Application Address</b>				<b>Drawing Numbers</b>			
109 & 110 Guilford Street London WC1N 1DP				See draft decision notice			
<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. External works in association with change of use from 2 HMO bedsits to 2 x 1 bed self-contained flats at basement level at 109 and 110 including refurbishment of both buildings including erection of 1st floor rear extension to existing closet wing, partial demolition of existing ground floor rear extension and enlargement of the existing lightwell, replacement of windows at third floor level to front elevation at no. 110. ii. External works in association with change of use from 2 HMO bedsits to 2 x 1 bed self-contained flats at basement level at 109 and 110 including refurbishment of both buildings including erection of 1st floor rear extension to existing closet wing, partial demolition of existing ground floor rear extension and enlargement of the existing lightwell, replacement of windows at third floor level to front elevation at no. 110 and internal alterations on all floors to both buildings including provision of en-suite in all HMO units.							
<b>Recommendation(s):</b>		i. <b>Grant conditional planning permission subject to a Section 106 Legal Agreement</b> ii. <b>Grant conditional listed building consent</b>					
<b>Application Type:</b>		i. <b>Full planning permission</b> ii. <b>Listed building consent</b>					

<b>Conditions or Reasons for Refusal:</b>	<b>Refer to Draft Decision Notice</b>					
<b>Informatives:</b>						
<b>Consultations</b>						
<b>Adjoining Occupiers:</b>	Site notices Press notice	<b>28/09/2018-22/10/2018</b> <b>04/10/2018-28/10/2018</b>	No. of responses	<b>0</b>	No. of objections	<b>0</b>
<b>Summary of consultation responses:</b>	No correspondence was received from the neighbouring occupiers.					
<b>Bloomsbury CAAC</b>	<p>The Bloomsbury CAAC have objected to the proposed scheme on the following grounds:</p> <ol style="list-style-type: none"> <li>1. The existing two houses and their gardens have been already overdeveloped with crammed-in student accommodation.</li> <li>2. The rear extension at 110 would make the overdevelopment worse.</li> </ol> <p><i>Officer response:</i></p> <ol style="list-style-type: none"> <li>1. <i>Planning permission has been granted in 1986 under application ref no. 8600643 and 8670125 for the full infill extension at no. 109 and internal alterations to accommodate the hotel use. Under application ref no. 9000333 for no. 110, existing drawings show internal subdivisions as currently in existing. Both buildings comply with HMO licensing requirements, as confirmed by environmental health officers. Please see land use section paras 4.1 to 4.9</i></li> <li>2. <i>The proposed scheme has been revised to omit the infill rear extension at no. 110 and partially remove the existing single storey rear structures. The existing garden space would therefore be enlarged. Please see section 2 on revisions and paras 4.24 to 4.27</i></li> </ol>					



## Site Description

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.

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. Regarding the property at no. 109, this has been subdivided and extended with an infill rear extension in line with permission granted in 1986. Regarding the property at no. 110, the rooms have been historically subdivided, as confirmed by the applicant and by planning records from 1990 showing drawings with partition walls, as currently in existence. In addition, the building at no. 110 has an unlawful single storey rear extension.

Both buildings have had an HMO licencing for over 10 years and the applicant confirms that they have been rented out mainly as student accommodation for several years. The buildings currently have a total of 20 bedrooms, 4 communal kitchens, communal bathroom facilities and laundry room currently existing between the two properties.

## Relevant History

### Relevant history at the application site:

**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**

### Other relevant planning applications in vicinity:

**9300509 - 68-69 Guilford Street WC1** - Internal refurbishment and restoration in connection with the use of the buildings for nurses bedsit accommodation on first second and third floors and administrative offices for the National Hospital and the Institute of Neurology on ground floor and basement – **Granted 21/10/1993**

**2010/1318/P- 111 Guilford Street** - Change of use of part of ground floor and first - third floors from 1 x four bedroom maisonette and retail ancillary storage to 4x1 bedroom flats (Class C3), and erection of rear first floor extension. – **Granted subject to s106 legal agreement dated 16/06/2010**

**2013/8203/P** - 80 Guilford Street - Change of use from nurses hostel (Sui Generis) to residential (Class C3) to provide 5 flats (3 x 1 bed and 2 x 2 bed) with associated basement terrace and cycle &

refuse storage, raising and replacement of roof, installation of 4 rooflights, alterations to fenestration and hard and soft landscaping. - **Granted subject to s106 legal agreement dated 25/09/2014**

**2015/2654/P** - 82 Guilford Street - Change of use from nurses' hostel (sui generis) to residential (use class C3) (4 x 1 bedroom flat; & 1 x 2 bedroom flat) and associated alterations, including rear extension at basement, ground, first & second floor levels. – **Granted subject to s106 legal agreement dated 28/09/2015**

## **Relevant policies**

### **National Planning Policy Framework (2019)**

#### **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 H6 Housing choice and mix

Policy H7 Large and small homes

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

#### **Camden Planning Guidance**

CPG – Design 2019

CPG – Interim Housing 2019

CPG 2 – Housing May 2016 (as amended March 2019)

CPG – Amenity 2018

CPG 7 – Transport 2019

CPG 8 – Developer Contributions 2019

### **Bloomsbury Conservation Area Appraisal and Management Strategy 2011**

### **Housing Act 2004, Part 2, as amended 2018**



### 1. Proposal

- 1.1 The building currently comprises 20 non-self-contained Housing in Multiple Occupation (HMO) bedsits/sleeping rooms with shared facilities (kitchens and bathrooms) (hereafter “bedsits”) including 9 bedsits at no. 109 and 11 bedsits at no. 110 with two kitchens in each building. The current proposal aims to rationalise the spaces, and improve the current standard of accommodation for occupants, with an overall reduction in HMO bedsits of 5. This involves the loss of 1 bedsit at no. 109 and 4 bedsits at no. 110, resulting in 8 bedsits at no. 109 and 7 bedsits at no. 110 Guilford Street.
- 1.2 It is noted that historically the building at no. 110 has been subdivided and there are no planning records relating to these works. The works were possibly undertaken prior to the listing in 1974. There is no evidence currently available suggesting the internal alterations to 110 were undertaken after the listing and it is not possible to be certain at this time that the internal alterations themselves required listed building consent.
- 1.3 The applicant seeks planning and listed building consent to refurbish the Grade II listed buildings and retain the HMO use throughout, except for the basement level, which would be converted from 2no.HMO bedsits and 2no. shared kitchens to 2no x 1-bedroom self-contained flats, one in each building. The shared facilities serving the non-self-contained HMO bedsits would be repositioned in the building to provide a better standard of facility.
- 1.4 Planning permission is sought for:
- Change of use from 2 HMO bedsits and shared facilities (Sui-Generis) at basement levels, to 2 x 1 bedroom self-contained flats, of 43sqm at no. 109 and 41sqm at no. 110 including front porch area, plus additional 6.8sqm for storage space accessed via the front porch.
  - Partial removal of existing unlawful single storey rear structures at no. 110 (built after listing) and enlargement of existing lightwell.
  - First floor rear extension of the existing closet wing.
  - Replacement of windows at third floor level on front elevation at no. 110, from casement windows to timber sash windows.
  - Replacement of existing casement windows at roof level at no. 110 with timber sash windows.
- 1.5 Listed building consent is sought for the above external alterations as well as internal works associated with the refurbishment of the existing two buildings to include:
- Installation of ensuite toilet pods and ensuite units on all floors;
  - Creation of communal kitchens on ground floor levels;
  - Demolition of non-original partition walls;
  - Rearrangement doors and access into bedsits.

## **2. Revisions**

2.1 An initial planning application was submitted consisting of alterations and extensions to provide 11 self-contained studio flats at no. 109 and 12 self-contained studio flats at 110 which has been subsequently withdrawn following advice from officers. A pre-application was subsequently submitted which resulted in constructive discussions between the officers and applicant, followed by the current planning application, which addressed substantial concerns in relation to the internal layouts.

2.2 During the course of the current application, revisions to the proposed scheme were requested by officers to address concerns in relation to:

- Partial removal of ground floor rear extension at no. 110, resulting in enlargement of rear lightwell;
- Detailed design of the en-suite pods;
- Reinstatement of the historic plan form on the first floor of no. 110, to include removal of partition wall in the front room resulting in the creation of a larger bedsit and loss of a small one;
- Reinstatement of plan form at basement level, to include removal of partition walls in front room and relocation of existing en suite at no. 109 in the rear room.

## **3. Considerations**

3.1 The main issues to be considered in this case are as follows:

- Land use
- Quality of accommodation
- Design and Heritage
- Impact on the amenity of adjoining occupiers
- Transport and planning obligations
- Planning balance

## **4. Assessment**

### **Land use**

4.1 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. The current accommodation is occupied by more than six people who do not live as a family but are long-term residents sharing some facilities.

4.2 Both buildings are currently in use as HMOs with shared facilities (Sui Generis). Environmental Health Officers confirmed that both premises have been registered as HMOs for more than 10 years and they have HMO licences. Currently, the property at no. 109 has 9 bedsits with floor areas varying from 9.3sqm to 22sqm per bedsit, with 9 occupiers, and no. 110 has 11 bedsits with floor areas varying from 9.1sqm to 20.5sqm, with 11 occupiers. Both buildings benefit from two shared kitchens each, at basement and



second floor levels, with one communal bathroom and one toilet at no. 109 and three shared bathrooms and one toilet at no. 110.

4.3 Under Policy H10 the council will support development of housing with shared facilities provided that the development:

- will not involve loss of two or more self-contained homes;
- will not involve a site identified for self-contained housing;
- complies with any relevant standards for houses in multiple occupation;
- contributes to creating a mixed, inclusive and sustainable community;
- does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity
- it is secured as a long-term addition to the supply of low cost housing, or otherwise provides an appropriate amount of affordable housing.

4.4 As such, the proposed development would retain the residential use throughout the building, with no loss of residential space, retaining the long-term low cost housing with shared facilities. The existing bedsits comply with standard of accommodation for houses in multiple occupation and have been rented out throughout the years generally to students from all over the world contributing to a mixed, inclusive and sustainable communities. The only other buildings along the street which have HMO licencing are at nos. 77 and 78 Guilford Street, located at the opposite end of the street, and therefore the proposed scheme would not result in a harmful concentration of such a use.

4.5 The proposed refurbishment of both buildings, along with the proposed extensions and alterations are aimed at retaining the HMO use insofar as practical and upgrading the quality of accommodation for the occupiers. Within no. 110 Guilford Street, some of the internal division has been undertaken historically, without express consent. It is unclear whether this actually needed consent as it may have been undertaken before the buildings were listed in 1974 – the listing only provides a description of the outside of the building and notes the interior was not inspected, which was common at the time. Regardless, this has resulted in poor quality accommodation and harm to the significance of the listed building in terms of plan form and historic fabric. Given the significant amount of time elapsed since these works have taken place, and lack of evidence of a breach available at this time, there is no scope of enforcement action to be taken at this time to reinstate the historic plan form.

4.6 The reinstatement of the historic plan form within both buildings, as well as upgrading the quality of accommodation for the occupiers would result in loss of 5no. bedsits with shared facilities, 1no. bedsits at no. 109 and 4no. bedsits at no. 110, where 2no. of the bedsits would be replaced by 2no. self-contained flats at basement level. Historically, the buildings along Guilford Street have been converted into nurses hostels, along with significant subdivisions and internal alterations. The planning history of the buildings along the street show that a number of buildings have been granted permission for conversion into self-contained residential units in recent years (nos. 68-69, 78, 79, 80, 81, 82 etc). Initially, the applicant considered a similar redevelopment of both buildings; however, given significant loss of housing with shared facilities along the street and within the borough as a whole, the officers insisted upon meeting the aims of policy H10 in retaining the housing with shared facilities as the primary use of the buildings so far as possible, and balanced with the need to consider the impact on the listed buildings. As such, the proposed scheme results in no

loss of small scale and low cost residential floor space, only a reconfiguration which leads to better quality of accommodation and heritage benefits for both buildings, albeit with a reduction of non-self-contained bedsit accommodation to self-contained units.

- 4.7 Regardless of the loss of bedsits, in terms of HMO licencing due to the enlargement of the units, the ones with a floor area over 11sqm can be occupied by 2 persons. This would therefore result in an increase in the number of persons to occupy the bedsits at no. 109 from 9 currently up to 11 persons, and at no. 110 it would remain the same as existing up to 10 persons. As such, the proposed scheme would further ensure that use as housing with share facilities could reach the same occupancy and long-term viability in line with policy H10.
- 4.8 Currently, the basement level of both buildings each have a kitchen in the rear room and a bedsit room in the front. The current proposal would re-provide the kitchen facilities at ground floor levels in the front rooms making it more accessible for the occupants of the bedsits and also reinstating its historic use of this room as a social hub for the whole building. The use of the rear rooms as bedsits was considered as an option, however this area receives low levels of daylight, sunlight and outlook, which would not meet appropriate standards of accommodation for a bedsitting room with no other aspect. The option of retaining the bedsits only to front rooms would have resulted in a redundant room to the rear, making inefficient use of the space. As such, a better use of this constrained space would include provision of self-contained accommodation, which would retain the front rooms as the main living space for the units including kitchen, and open up to the rear rooms to provide the bedrooms with en-suites. Although the levels of daylight and sunlight would be low at the rear of the unit, due the opening in between the rooms the unit would be dual aspect, and the removal of partition walls in front rooms would result in a larger area, with less impact on the future occupiers, in line with policy A1. The outlook to the rear of these units would also be very restricted, but this would be to the sleeping space where outlook and light is less important.
- 4.9 The proposed reconfiguration of both buildings, whilst not resulting in loss of any residential floor space, it will result in a net decrease of bedsit sleeping rooms, which is unfortunate. However, the decrease in bedsits would result in an overall enhancement of the quality of accommodation within both buildings due to the reconfiguration of the shared facilities to respond to the current needs of occupiers, enlargement of bedsits and provision of en-suite bathrooms within each bedsit. In addition, given that both buildings are grade II listed, the loss of bedsits must be weighed against the heritage benefits of the removal of non-original partition walls, reinstating the plan form, and reconfiguration of the shared facilities securing the buildings' optimal viable use, all of which would enhance the significance of the listed buildings, whilst helping sustain the HMO use for the longer term in line with the overall aims of policy H10.

### **Quality of accommodation**

- 4.10 The proposed HMO bedsits would occupy the ground floor and above floors, with a range of floor areas including en-suites of 12sqm, to 22sqm, which would be significantly above the minimum of 6.51sqm floor area standard introduced by the amended Housing Act in 2018. In order to ensure a long term stability of the HMO use, the proposal would significantly enhance the current provision of shared facilities as it would result in larger, more accessible and better equipped kitchens at ground floor levels, as the main focus within both buildings. The kitchen at second floor level for no. 110 has been enlarged by 3.45sqm whilst the one at no. 109 remained similar to existing. In addition to the overall refurbishment, the proposal includes the provision of en-suites in all HMO bedsits, which would improve the current standard of accommodation for future occupiers, affording them

greater privacy.

- 4.11 Due to the enlargement of the units and in line with the HMO licencing requirements, the bedsits with a floor area larger than 11sqm can be occupied by 2 persons. As such, regardless of the loss of bedsits, the level of occupancy of the HMO can be retained at no. 110 and slightly increased by 1 person at no. 109.
- 4.12 The proposed scheme would achieve good quality accommodation by taking into account optimal provision of daylight, sunlight and outlook within all units as well as compliance with fire regulations. As such, as explained in the land use section above, several amendments have been provided in relation to the accommodation at the basement level and the optimal one was to design these units with the benefit of dual aspect windows, to ensure an increase in daylight to the main living space in the front room, supplemented by that received from the rear lightwells. The internal floor space of the front rooms has been enlarged by removing non-original partition walls which formed corridors to support the previous housing with shared facilities function. As a result, both self-contained units would have separate access from the HMO bedsits, via the front lightwell, through a front porch, and access to the rear patio area. In addition, both units would have access to 6.8sqm of storage space accessed via the front porch.
- 4.13 In relation to the self-contained unit at no. 109, the rear room would receive low levels of daylight and sunlight and would have restricted outlook, due to the existing extension at ground floor level and small lighthwell, of 1.4m deep. However, the unit would retain the front room, now larger, as main living accommodation, which was previously used as one single bedsit. The front room has from two large windows (1.15m x 1.4m) opening into the existing front lightwell, on the south facing side of the building. It is acknowledged that due to the site constraints the unit would benefit from limited levels of daylight, sunlight and outlook; however, the unit would have a floor area which would exceed the national minimum requirements for 1bedroom 1person self-contained flat of 37sqm by 12.8sqm (including storage space), allowing for more spatial comfort for future occupiers.
- 4.14 Regarding the self-contained unit at no. 110, due to the proposed partial removal of the single storey rear structures, the rear lightwell will be enlarged to 2.3m deep, allowing for greater levels of daylight, sunlight and outlook to be received by the future occupiers. Similarly with the one at no. 109, the front room of the proposed unit would have two large windows opening into the existing front lightwell, serving the main living space of the unit. It is acknowledged that the standard of accommodation for this unit would be better than the one at no. 109, however this would still be limited due to the site constraints. This unit would also exceed the minimum national requirements for 1bedroom 1person unit by 10.8sqm (including storage space), and have access to rear patio area, allowing for more spatial comfort for future occupiers.
- 4.15 As such, given the site constraints and nature of the application buildings, it is acknowledged that the proposed self-contained units would not provide the optimum level of accommodation, however when considering this element on balance with the other benefits of the scheme, this would subsequently be considered acceptable. It should also be noted that the basement is currently used as bedsit rooms. It is an important material consideration that, whilst not achieving the optimum standards of light and outlook, the proposed basement accommodation would nonetheless be an improvement over the current position.
- 4.16 It is noted, that in relation to the existing units, covered already by HMO licencing, the current situation would be significantly improved at no. 110 for Unit 2 at ground floor level subject to the partial removal of the single storey rear structures and enlargement of rear

lighwell. In addition, the units at first, second and third floors within both buildings, would be enlarged and reconfigured to reinstate the historic plan form, providing an enhancement to the current standard of accommodation.

## **Design and Heritage**

- 4.17 Planning (Listed Buildings and Conservation Areas) Act 1990 Listed buildings, in considering developments that affect a listed building or its setting, Section 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 requires that local authorities shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 4.18 In considering developments affecting a conservation area, Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires that local authorities shall pay special attention to the desirability of preserving or enhancing the character or appearance of that area. In this case, the site forms part of Bloomsbury Conservation Area lies within Sub Area 10 (Great James Street/ Bedford Row). In line with the above statutory duties and recent case law, considerable importance and weight has to be attached to the impact of the heritage assets and their setting.
- 4.19 It should also be noted that the duties imposed by section 66 and 72 of the Act are in addition to the duty imposed by section 3(6) of the Planning and Compulsory Purchase Act 2004, to determine the application in accordance with the development plan unless material considerations indicate otherwise. The NPPF requires its own exercise to be undertaken as set out in its chapter 16, Conserving and enhancing the historic environment. Paragraph 190 requires that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal.
- 4.20 For the proposed scheme, the relevant Camden Plan policies are D1 and D2, which provide more detailed guidance on the Council's approach to protecting or enhancing the range of features that make up our built heritage. It states that the Council will not permit development that results in substantial harm to designated heritage assets, unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh that harm; and if the development would cause less than substantial harm to the heritage assets then the public benefits of the proposal should convincingly outweigh that harm.
- 4.21 The application buildings are part of a Grade II listed row of 6no. terraced buildings, built c1792-1800. The Historic England listing from 1974 includes references to nos. 109 and 110 as follows "*Stucco 1st floor sill bands. Slated mansard roofs (No.109 tiled) with dormers. 3 storeys, attics and basements. 2 windows each. Nos 105 and 110, stucco doorway surrounds with pilasters carrying a simplified, bracketed cornice (No.105 doorway altered; [...];No.109, C20 doorway. Reddened, gauged brick flat arches to recessed sashes, most with 2-panes; [...]*Nos 108-110, stone cornices and blocking courses.[...] *Subsidiary features: attached cast-iron railings with urn finials to areas*". The buildings were built for residential purposes, as single family units, which later on have been altered internally to accommodate offices, hostels of nurses, or housing with shared facilities.
- 4.22 Since 1801, as the historic plans show, the rear of the buildings has been developed with rear additions and/or outbuildings. Within the 20<sup>th</sup> century, many of the properties within the terrace have been re-fronted due to war damage, including no. 109. The rear of both buildings has been further extended as shown in historic plans of 1960 as included in the Heritage Statement, showing a glass extension or conservatory on the northern end of no. 109, which appears as a solid extension on 1982 OS map. The proposed scheme has



been therefore assessed by considering the impact of the proposed works to the elements of significance as well as historic plan form and fabric, which directly contribute to the buildings' significance.

4.23 It is noted that with regards this part of Bloomsbury Conservation Area, the statement highlights Guilford Street as part of a group of streets which are vulnerable to negative change through incremental deterioration due to neglect and lack of maintenance of buildings (para 5.9). As such, the proposed refurbishment of both buildings would respond positively to the significance of the conservation area identified in the conservation area statement.

#### External works

4.24 Planning permission and listed building consent has previously been granted in 1986 to extend the rear of no. 109 fully with a single storey extension and a lightwell adjacent to the rear wall of the main building. The building at no. 110 has been also been extended to the rear with unlawful single storey rear structures, with no evidence of consent. Proof has been provided by the applicant to demonstrate that the structures have been in situ for more than 10 years and whilst they do not benefit from immunity by the passage of time given their listed status, the current proposal would improve the current, established situation.

4.25 The revised scheme would partially demolish the single storey structures at no. 110 and enlarge the existing lightwell, which would improve the levels of daylight, sunlight and outlook to the rooms at ground and basement levels. The demolition of the rear non-original structure would improve the current situation, as this would improve the appearance of the rear elevation of the host building, provide additional garden space to the rear of the building and improve the quality of accommodation at ground floor and basement levels. The partial retention of rear structures would be acceptable in this instance as it would preserve the historic plan form of the building, given the extensive history of rear additions to the building since 1871. Details of the materials to be used in rebuilding the existing extensions would be secured by condition which, together with removal of the existing inappropriate rear additions, would enhance the significance of the listed buildings.

4.26 The proposed extension of the existing closet wing at first floor level, would follow the existing proportions of the existing structure, and only extend further by 0.9m in depth and open to the rear with a traditional hung sash timber window, matching the others within the building. The proposed rear window would replace an existing small, non-original poor quality window to the rear elevation, which would overall enhance the significance of the listed building. The extension would preserve the historic proportion of the closet wing and its projection would not harm the significance of the historic building, fabric and plan form. The proposed extension, due to its small proposed projection, would have limited visibility from the neighbouring buildings and is considered to preserve and enhance the character and appearance of the host building, terrace row and wider conservation area.

4.27 In addition, in order to further improve the external appearance of the building, the proposal includes replacement of existing casement windows at no. 110 to timber sash windows, following advice from conservation officers. Details of the new proposed windows would be secured via planning condition which would again lead to an enhancement of the listed building as fenestration strongly contributes to its significance.

#### Internal alterations

4.28 Further to the external alterations proposed, the scheme would also include a number of internal alterations to enhance the quality of accommodation, and to enhance the

significance of the listed buildings by reinstating plan forms, and carefully managing new interventions such as the en-suite pods. The buildings have been internally modelled and re-arranged through time, and comprise mainly rooms that have been converted to bedrooms, with en-suite shower rooms, communal bathrooms and other communal areas including kitchens, laundry areas and storage. Several of the principal rooms have been sub-divided and internal stud walls have been erected throughout to form corridors to allow access between rooms, resulting in harmful fragmentation of the original plan form of both buildings. However, despite previous alterations, there are elements of significant value which would still be retained such as original skirting board, picture rail and door architrave is still present within the principal rooms, all of which contribute to the historical significance. The front principal rooms have a curved rear wall and surviving moulded plaster coricing, ceiling rose, dado rail and picture rail, as well as late 18<sup>th</sup> century fire surround with central decorative panel (at first floor of no. 109, rear bedroom). All these elements would be preserved and made good as part of this scheme.

- 4.29 The main issue for consideration in terms of impact on the listed building is the insertion of en-suite pods within the rooms of no. 110 and reorganisation of existing en-suites within both buildings. The pods' design has been revised during the pre-application process and during the life of the current application in order to ensure that the harm to the significance of the listed building, plan form and historic fabric would be kept minimal. The pod system would result in a standalone structure, built with a 75mm metal stud walls and would be attached to the existing fabric using soft joints, ensuring that they would be completely reversible in the future. The pods have been revised to include shadow gaps on all junctions with existing walls, and at its ceiling, to ensure that the pod is read completely separate from the existing fabric. The height of the pods has also been addressed to minimise views towards the ancillary ducting and servicing; however, an adequate distance to the ceiling would still be retained to ensure no harm to the historic fabric. In addition, in order to further distinguish the proposed pods within each bedsits, they would have a finish of 8mm wood fibre panelling (called Valchromat) of different colours, such as blue, green, orange and violet.
- 4.30 In light of the above, the installation of proposed pods within the units at first and second floors at no. 110, would preserve the fabric of the building and so in this respect preserve the significance the fabric contributes. However, the insertion of the pods would cause less than substantial harm to the plan form of the rooms within the building, which also contribute to the building's significance. The servicing for the pods will involve some minor interventions in the fabric of the building but these will be repairable. Nonetheless, this will also cause very minor harm to the fabric, which would be less than substantial. The level of harm deriving from the pods and servicing is minimal and as set out in the paragraph above, the pods have been carefully designed to minimise the level of harm as much as possible. The level of harm is only very slight, but it is nonetheless harm, albeit less than substantial harm. However, there are also significant heritage benefits that would be secured through the proposal which must also weigh into the balance. The proposal includes reinstatement of historic plan form in different locations, such as removal of non-original partition walls in the front room, which would result in loss of one HMO unit and creation of a larger one at first floor level. To balance against the harm caused by the introduction of the pods at second floor level, the wall which forms the kitchen would be relocated away from the hung sash window fronting Guilford Street, providing relief and better appreciation to the window, as element of significance for the heritage asset.
- 4.31 At ground floor level the proposal includes provision of kitchens in the front rooms, which would create the social hub of the buildings, making reference to its historical intended use and enhancing the current kitchen provision existing at basement level. The kitchens would have a central island and workspace would be away from the historic fabric, which

conserves the significance of the host buildings. The fireplaces and the curved rear walls and the surviving moulded plaster cornicing, ceiling rose, dado rail and picture rails would be retained and make good as part of this proposal.

- 4.32 At basement levels within both buildings, the front rooms have been subdivided by partition walls to create corridors and at no. 110 by an en-suite as granted in 1986. Historically, the front room at basement level was free from any partitions and the revised plans would reinstate the historic plan form, by removing the existing partition walls and relocate the en-suites at no. 110 to the rear room, with similar provision at no. 109. The existing opening in the partition wall of the rear room would be closed off but the door would be retained and locked shut, to preserve its historic significance. In order to allow daylight and sunlight to flow through both rooms, and contribute towards an optimal level of accommodation for future occupiers, an opening within the spine wall would be provided, which is not considered to cause harm to the historic plan form given the removal of subdivision within the front room.
- 4.33 Overall, it is considered that the proposed scheme puts forward numerous internal and external alterations which contribute positively to the significance of the heritage assets.

### **Amenity**

- 4.34 Policy A1 seeks to protect the quality of life of occupiers by only granting permission for development that would not harm their amenity. The main factors which are considered to impact the amenity of neighbouring residents are overlooking, loss of outlook and sense of enclosure, implications on daylight, sunlight and noise. Impacts on internal amenity within the development site are discussed above.
- 4.35 Due to the nature and scale of external extensions, the proposed works, it is not considered that any harm would be caused to the amenity of the neighbouring occupiers.

### **Transport and planning obligations**

- 4.36 Due to the central London location of the application site and constrained site access, a Construction Management Plan would be secured via a s106 legal agreement to ensure that the construction works would not cause additional traffic pressure on the surrounding streets and wider area, in line with policy A1. The monitoring fee of the CMP would be £3136.
- 4.37 In line with policy T2, all units would be secured as car free via a s106 legal agreement.

### **Planning Balance**

- 4.38 The proposed internal and external alterations have been balanced in line with the statutory duty of protecting the significance of the heritage assets as required under Section 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 and the provision of good quality accommodation for future occupiers for housing with shared facilities and self-contained units, in line with policies H6, H7, H10, D1 and D2.
- 4.39 In terms of internal alterations, the installation of pod en suites and servicing, in themselves would cause less than substantial harm to the significance of the listed building, in terms of fabric and plan form. This harm would be slight but nonetheless considerable weight must be attached to this harm. However, in line with the statutory duty of protecting the significance of the heritage assets, the proposed reinstatement of historic plan form and internal reconfiguration of uses within the building are both given significant weight in the assessment of the proposed scheme. The partial removal of the rear extension would

further contribute to reinstating the historic significance of the building. These heritage benefits are considerable and given very significant weight. Indeed conservation officers consider the public benefits of the heritage enhancements alone to outweigh the heritage harm.

4.40 In terms of general balance, the loss of 5no. HMO bedsits within both buildings and the limited standard of accommodation of the proposed self-contained units at basement level, weigh against the scheme. However, in favour of the scheme, the overall heritage benefits that will be secured resulting in enhancement of the listed buildings overall are considerable and given significant weight. Furthermore, the removal of the extensions would enhance the current standard of accommodation for the adjacent units. Thirdly, the proposed scheme would enhance the quality of accommodation for future occupiers within the HMOs and self-contained flats, affording improved accommodation, less cramped living conditions, improved shared facilities, and an improved sense of privacy, with an overall possible increase in number of occupiers.

4.41 On balance, it is considered that the negatives of the scheme, would be cumulatively outweighed by the net heritage benefits of the proposed scheme along with the other improvements to the existing conditions in the premises, in line with the overall aims of the NPPF and the development plan.

## **5. Recommendation**

5.1 (i) Grant conditional planning permission subject to section 106 legal agreement.

5.2 (ii) Grant listed building consent.

***The decision to refer an application to Planning Committee lies with the Director of Regeneration and Planning. Following the Members Briefing panel on Monday 8th of April 2019, nominated members will advise whether they consider this application should be reported to the Planning Committee. For further information, please go to [www.camden.gov.uk](http://www.camden.gov.uk) and search for 'Members Briefing'.***



Juttla Architects  
Argyle House Joel Street  
Northwood Hills  
HA6 1NW  
United Kingdom

Application Ref: **2018/4338/P**

04 April 2019

Dear Sir/Madam

**DRAFT**  
**FOR INFORMATION ONLY - THIS IS NOT A FORMAL DECISION**  
Town and Country Planning Act 1990 (as amended)

**DECISION SUBJECT TO A SECTION 106 LEGAL AGREEMENT**

Address:  
**109 & 110 Guilford Street**  
**London**  
**WC1N 1DP**

Proposal:

**DECISION**  
External works in association with change of use from 2 HMO bedsits to 2 x 1 bed self-contained flats at basement level at 109 and 110 including refurbishment of both buildings including erection of 1st floor rear extension to existing closet wing, partial demolition of existing ground floor rear extension and enlargement of the existing lightwell, replacement of windows at third floor level to front elevation at no. 110.

Drawing Nos: P101; P201 Rev D; P202 Rev N; P203 Rev G; P302 Rev C; P303 Rev B; P304 Rev N; P305 Rev J; P306 Rev I; P601 Rev G; P603 Rev G; P1110-M-100 Rev P3; P1110-M-101 Rev P3; P1110-M-102 Rev P3; P601 Rev G; P301 Rev E; P302 Rev C; P303 Rev B; R901; Design and Access statement Rev - H March 2019; Heritage Statement dated 11/05/2017.

The Council has considered your application and decided to grant permission subject to the conditions and informatives (if applicable) listed below **AND** subject to the successful conclusion of a Section 106 Legal Agreement.

The matter has been referred to the Council's Legal Department and you will be contacted shortly. If you wish to discuss the matter please contact **Aidan Brookes** in the Legal Department on **020 7 974 1947**.

Once the Legal Agreement has been concluded, the formal decision letter will be sent to you.

Condition(s) and Reason(s):

- 1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

- 3 The development hereby permitted shall be carried out in accordance with the following approved plans:

P101; P201 Rev D; P202 Rev N; P203 Rev G; P302 Rev C; P303 Rev B; P304 Rev N; P305 Rev J; P306 Rev I; P601 Rev G; P603 Rev G; P1110-M-100 Rev P3; P1110-M-101 Rev P3; P1110-M-102 Rev P3; P601 Rev G; P301 Rev E; P302 Rev C; P303 Rev B; R901; Design and Access statement Rev - H March 2019; Heritage Statement dated 11/05/2017.

- 4 Before the relevant part of the work is begun, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:

- a) Details of all facing materials to be used in the reconstruction of the rear structures at no. 110, following partial demolition, to include manufacturer's details.
- b) Details including sections at 1:10 of all new windows (including jambs, head and cill).

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

Informative(s):

- 1 You are advised that any works of alterations or upgrading not included on the approved drawings which are required to satisfy Building Regulations or Fire Certification may require a further application for listed building consent.
- 2 Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.
- 3 Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.
- 4 Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.
- 5 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 6 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraphs 186 and 187 of the National Planning Policy Framework.

Yours faithfully

Supporting Communities Directorate

Juttla Architects  
Argyle House Joel Street  
Northwood Hills  
HA6 1NW  
United Kingdom

Application Ref: **2018/4610/L**

Please ask for:

**Nora-Andreea****Constantinescu**Telephone: 020 7974 **5758**

4 April 2019

**DRAFT**

Dear Sir/Madam

**DECISION**

Planning (Listed Building and Conservation Areas) Act 1990

**Listed Building Consent Granted**

Address:  
**109 & 110 Guilford Street**  
**London**  
**WC1N 1DP**

**DECISION**

## Proposal:

External works in association with change of use from 2 HMO bedsits to 2 x 1 bed self-contained flats at basement level at 109 and 110 including refurbishment of both buildings including erection of 1st floor rear extension to existing closet wing, partial demolition of existing ground floor rear extension and enlargement of the existing lightwell, replacement of windows at third floor level to front elevation at no. 110 and internal alterations on all floors to both buildings including provision of en-suite in all HMO units.

Drawing Nos: P101; P201 Rev D; P202 Rev N; P203 Rev G; P302 Rev C; P303 Rev B; P304 Rev N; P305 Rev J; P306 Rev I; P601 Rev G; P603 Rev G; P1110-M-100 Rev P3; P1110-M-101 Rev P3; P1110-M-102 Rev P3; P601 Rev G; P301 Rev E; P302 Rev C; P303 Rev B; R901; Design and Access statement Rev - H March 2019; Heritage Statement dated 11/05/2017.

The Council has considered your application and decided to grant subject to the following condition(s):

Conditions And Reasons:

Executive Director Supporting Communities





- 1 The works hereby permitted shall be begun not later than the end of three years from the date of this consent.

Reason: In order to comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:

P101; P201 Rev D; P202 Rev N; P203 Rev G; P302 Rev C; P303 Rev B; P304 Rev N; P305 Rev J; P306 Rev I; P601 Rev G; P603 Rev G; P1110-M-100 Rev P3; P1110-M-101 Rev P3; P1110-M-102 Rev P3; P601 Rev G; P301 Rev E; P302 Rev C; P303 Rev B; R901; Design and Access statement Rev - H March 2019; Heritage Statement dated 11/05/2017.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

- 3 All new work and work of making good shall be carried out to match the existing adjacent work as closely as possible in materials and detailed execution.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

- 4 Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:

- a) Details of bricks for external air-vents to include manufacturer specifications.
- b) Typical details of new railings to the rear at a scale of 1:10 with finials at 1:1, including materials, finish and method of fixing into the plinth.
- c) Details of the interventions to comply with fire regulations scale 1:10 including schedule of doors to be upgraded to meet fire standards, with highlight on any original doors.
- d) Plan, elevation and section drawings of all new doors at a scale of 1:10 with typical moulding and architrave details at a scale of 1:1.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

- 5 All original architectural features including e.g. cornices, architraves, skirting, floorboards, timber panelling, balustrades, and fireplaces shall be retained and repaired to match the original work unless shown on the drawings hereby approved.

Reason: In order to safeguard the special architectural and historic interest of the

building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

Informative(s):

- 1 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
- 2 You are advised that any works of alterations or upgrading not included on the approved drawings which are required to satisfy Building Regulations or Fire Certification may require a further application for listed building consent.
- 3 Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing Enforcement Team, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (Tel. No. 020 7974 4444 or search for 'environmental health' on the Camden website or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.
- 4 Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraph 38 of the National Planning Policy Framework 2019.

You can find advice about your rights of appeal at:

<http://www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent>

Yours faithfully

Director of Regeneration and Planning