

# PLANNING STATEMENT

In respect of

**79 Guilford Street, London, WC1N 1DF**

On behalf of

**Andrew and Romain Pingannaud**

JCG24227  
Planning Statement  
Final  
16 May 2019

## REPORT

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# 1 INTRODUCTION

- 1.1 This application for planning and listed building consent is submitted on behalf of Andrew and Romain Pingannaud ('The Applicant') for the following Development at 79 Guilford Street, WC1N 1DF ('The Site'): *"construction of a single-storey replacement rear extension, extension of existing basement and internal and external renovation works to a residential dwelling (Class C3)"* ('The Development').
- 1.2 The Site consists of a four-storey plus basement Georgian townhouse, along with its associated rear garden. The building is in residential use (Class C3), following the grant of planning permission for its change of use from a nurses' hostel to a dwellinghouse in May 2013 (ref: 2012/6170/P).
- 1.3 The proposal will enhance the significance and appreciate of the listed building through the introduction of a number of sensitive and appropriate design features, along with the provision of a high-quality replacement extension and terrace, and modest extension of the existing basement.
- 1.4 This Planning Statement sets out the key planning policies in relation to the Site and assesses the proposed Development against each of these policy considerations. It is accompanied by the following documents:
- Application form;
  - Cover letter;
  - Community Infrastructure Levy form;
  - Built Heritage Assessment, prepared by CgMs (part of the RPS Group);
  - Basement Impact Assessment & Construction Management Plan, prepared by Green Structural Engineering Ltd;
  - Outline Drainage Strategy, prepared by Green Structural Engineering Ltd;
  - Structural Report & Construction Management Plan, prepared by Green Structural Engineering Ltd;
  - Design documents, prepared by BÜF Architecture:
    - Design and Access Statement;
    - Schedule of Works; and
    - Existing, Demolition and Proposed Plans.
- 1.5 The Planning Statement comprises the following sections:
- **Section 2:** Site and Surroundings;
  - **Section 3:** Planning History;
  - **Section 4:** Proposed Development;
  - **Section 5:** Planning Policy;

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- **Section 6:** Planning Appraisal; and
- **Section 7:** Overall Conclusions.

1.6 The following appendices are also included as part of this Planning Statement:

- **Appendix A:** December 2018 Pre-Application Formal Response;

1.7 The following section identifies key aspects of the Site and its surrounding area.

## 2 SITE AND SURROUNDINGS

### The Site

- 2.1 The Site is situated to the north of Guilford Street and currently comprises a four-storey (plus basement) terraced Georgian townhouse in use as a family dwellinghouse (Use Class C3), as well as a rear garden.

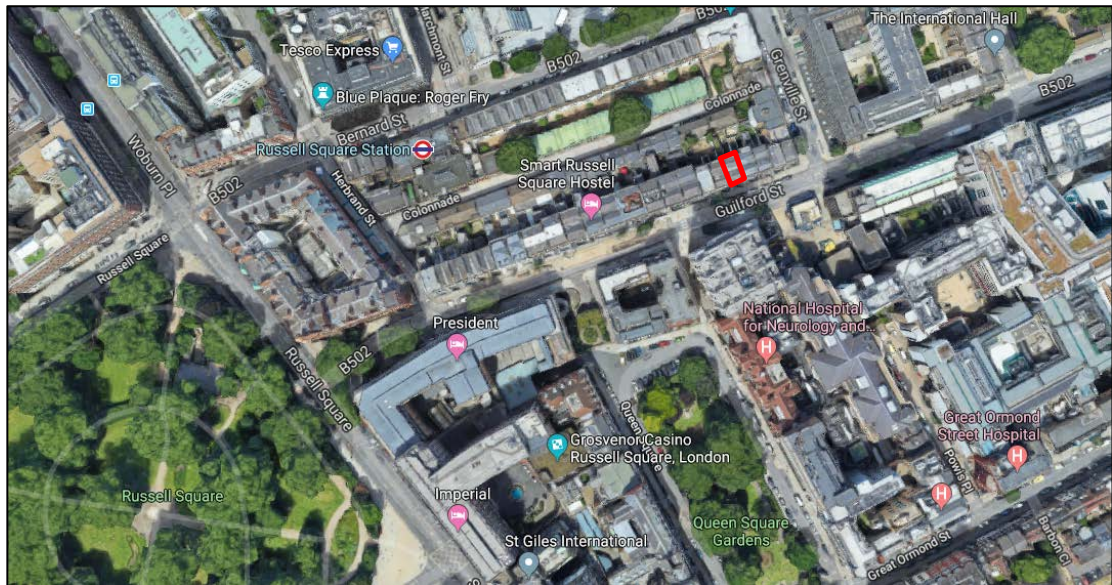


Figure 2.1: Aerial View of the Site (Outlined in Red)

- 2.2 The Site, along with Nos 75-82, is Grade II listed (“Numbers 75 To 82 And Attached Railings”), and sits within the Bloomsbury Conservation Area.
- 2.3 The building is constructed of London stock brick and forms part of a wider Georgian terrace constructed in a similar style. The Council’s Bloomsbury Conservation Area Appraisal outlines that the listed terrace dates from 1791 to 1794 and was built by James Burton, and that the historic fabric of the terrace only partially survives as the properties have been significantly altered. The listed terrace was historically on Historic England’s At Risk Register, although it has recently been removed.
- 2.4 As per the accompanying Heritage Assessment and Design and Access Statement, whilst the building generally retains its Georgian aesthetic externally, the historic quality of building’s internals have been significantly degraded as a result of successive interventions and amendments.
- 2.5 The Site is located within Flood Zone 1. It is in a highly accessible location, with a PTAL of 6b, and is situated approximately 200m from Russell Square underground station, as well as within walking distance to a number of bus stops.

### Surrounding Area

- 2.6 The Site is located in close proximity to, and outside of, the Holborn Growth Area and London Suburbs Archaeological Priority Area. The Site is also close to a number of open spaces, including Russell Square, Queen Square Garden and Coram's Fields.
- 2.7 The surrounding area is varied, with a mix of residential, hotel, restaurant and retail uses. The Site is also to the immediate north of the National Hospital for Neurology and Neurosurgery, as well as the UCL Queen Square Institute of Neurology and Great Ormond Street Hospital.
- 2.8 There are a number of listed building around the Site, most notably three Grade-II listed sets of terrace Georgian townhouses to the west, along Guilford Street. The listed terraces are as follows, in order of west to east:
- "Numbers 61 To 66 And Attached Railings";
  - "Numbers 67, 68 And 69 And Attached Railings"; and
  - "Number 70, 71 And 72 And Attached Railings".
- 2.9 The Bloomsbury Conservation Area Appraisal outlines that the north side of Guilford Street in this area is "in predominantly residential use with the prevailing pattern being terraced houses from the mid-late 18<sup>th</sup> century".
- 2.10 The appraisal also states that Guilford Street's street-scene is harmed by the presence of the unsympathetically scaled Queen Square Institute of Neurology, a 13-storey "concrete tower", the rear elevations of the buildings situated at the core of the Great Ormond Street Hospital Site, spanning up to eight storeys, and the nine-storey mid-20<sup>th</sup> former Great Ormond Street Hospital Nurses' Home, which has a "long elevation in brown brick dominating the street".
- 2.11 To the rear is a terrace of mews houses on Colonnade, a narrow, cobbled lane. The buildings are two-storey London stock brick mews properties which are in a poor state of repair. These buildings are considered to make a positive contribution to the Conservation Area, and were originally built to serve the larger houses on Guilford Street.
- 2.12 On the basis of the Valuation Office Agency's Business Rates Records and Companies House records, the mews building to the rear of the Site, 3-5 Colonnade, is currently in use as a specialist photography studio (Class B1). This follows the grant of planning permission in November 1990 for the change of use of the unit from garage lock-up parking to B1/Studio Use (ref: 9000379).
- 2.13 Additionally, the ground floor of the mews building to the immediate west, 7-9 Colonnade, is currently used as storage, as per the Valuation Office Agency's Business Rates Records and the information included with the Officer's Report for the latest application at the property (ref: 2014/6883/P), which sought retrospective planning permission for the installation of security shutter.
- 2.14 As illustrated by the below picture, the mews buildings have limited openings onto the Site, along their rear elevation facing the rear garden.





*Figure 2.2: View of the Rear of the Mews Buildings from the Site*

- 2.15 The Site is bounded by 77/78 and 80 Guilford Street to the west and east, respectively, forming part of the Georgian terrace. Numbers 77 and 78 Guilford Street are currently in use as a nurses' hostel and are currently subject to two separate planning and listed building applications for their change of use to residential flats (ref: 2018/1070/L & 2018/0302/P; 2018/1104/L & 2018/0303/P).
- 2.16 As per the Valuation Office Agency's Council Tax Valuation List, 80 Guilford Street is currently in use as residential (Class C3), following the grant of permission for its change of use from a nurses' hostel (Sui Generis) to five residential flats (Class C3) (ref: 2014/0063/L & 2013/8203/P).
- 2.17 The wider row of buildings is characterised by a number of rear extensions within their rear garden space. Whilst these extensions generally span a single storey, some of these extensions are up to three storeys in height.
- 2.18 The adjoining property at 80 Guilford Street contains a single-storey rear extension, with terrace, along the boundary of the building and the Site. Screening has been installed along the west of the extension so as to prevent overlooking and loss of privacy between the two properties. Figure 2.3, below, shows the rear extension in question and its relationship with the Site.





*Figure 2.3: View of the Rear Extension at 80 Guilford Street (from the Site)*

- 2.19 The building at 77/78 Guilford Street also comprises a single-storey rear extension, as per Figure 2.4 below.



*Figure 2.4: View of the Rear Extension at 77/78 Guilford Street (from the Site)*

- 2.20 The following section outlines the Site and wider area's planning history.

### 3 PLANNING HISTORY

#### Planning History for the Site

3.1 Table 1.1, below, outlines the full planning history for the Site:

Application Reference	Site Address	Description of Development	Decision (Date)
TP4516	Nos. 68-69, 78-79 and 82, Guilford Street and 13-17, Grenville Street, St. Pancras	To change the use of the premises Nos. 68-69, 78-79 and 82, Guilford Street and 13-17, Grenville Street, St. Pancras	Approved  14/02/1963
2007/4164/P	77, 78 and 79 Guilford Street London WC1N 1DF	Change of use from nurses accommodation and offices associated with hospital use, to house in multiple occupation (35 rooms)	Withdrawn
2007/4166/L	77, 78 and 79 Guilford Street London WC1N 1DF	Internal works in association with change of use from nurses accommodation and offices associated with hospital use, to house in multiple occupation (35 rooms)	Withdrawn
2012/6170/P	79 Guilford Street London WC1N 1DF	Change of use from nurses hostel (Sui Generis) to single- family dwellinghouse (Class C3).	Granted  22/05/2013
2012/6198/L	79 Guilford Street London WC1N 1DF	Internal alterations in connection with change of use from nurses hostel (Sui Generis) to single- family dwellinghouse (Class C3).	Granted  22/05/2013

*Table 1.1: Planning History*

- 3.2 In February 1963, planning permission (ref: TP4516) was granted for the change of use of the Site, along with neighbouring properties, to use as residential accommodation for nurses and hospital domestic staff. It should be noted, however, that the consented development did not include any internal reconfiguration works, and internal works at the Site were therefore undertaken without listed building consent.
- 3.3 The above planning and listed building consents (ref: 2012/6170/P & 2012/6198/L, respectively) for change of use of the Site from a nurses' hostel to a residential dwellinghouse (Class C3) have been approved and lawfully implemented, and the building has been occupied as a residential dwelling for a number of years.

### December 2018 Pre-Application

- 3.4 Pre-application discussions were held in December 2018 in relation to the development of a replacement rear extension, extension of the existing basement, roof terrace and renovation works. Please find attached the December 2018 formal advice in **Appendix A**.
- 3.5 At the time, the proposed development included a roof terrace and new staircase access from third floor level. However, these elements do not form part of the current proposal.
- 3.6 The officer, in his response, did not raise any concerns with the principle of basement development at the Site, and considered that there would be potential to extend the basement to create a room behind the existing lightwell with minimal impact on the listed building.
- 3.7 Option 3 of the proposed basement design was considered to be the most suitable, as it would allow for a more traditional location for a lightwell behind the tea room, as well as limited apertures compared with the other options and could therefore be designed to reveal less of the new habitable area beneath the garden.
- 3.8 The officer also accepted the principle of a replacement rear extension at the Site, and, whilst it was considered that the proposed divided rear extension could prove “controversial”, it was noted that the extension could preserve the value of the amenity space, as well as the openness and character of the rear garden.
- 3.9 The formal advice also outlined that the principle of a replacement secondary staircase between the second and third floors is acceptable, so long as the proposal respects the historic position and style of a secondary staircase.
- 3.10 Finally, the proposed internal and external renovation works to the listed building were generally considered to be acceptable, subject to a detailed assessment of the changes.

### Surrounding Planning History

- 3.11 As noted above, permission for the change of use of the buildings to the west and east of the Site to a nurses’ hostel, within the wider Georgian terrace, was granted in February 1963 (ref: TP4516) and subsequently implemented.
- 3.12 In September 2014, planning permission and listed building consent (ref: 2013/8203/P & 2014/0063/L) were granted at 80 Guilford Street, to the immediate east of the Site, for its change of use from a nurses’ hostel to residential. The proposal included a basement/lower ground floor level terrace to the rear of the building.
- 3.13 Planning permission and listed building consent were withdrawn at 77 Guilford Street in December 2012 (ref: 2012/6171/P & 2012/6200/L) for its change of use from a nurses’ hostel to residential flats. The building is currently subject to a further planning and listed building consent application for its change of use to residential, which is currently under determination (ref: 2018/0302/P & 2018/1070/L).
- 3.14 In December 2012, planning and listed building consent were granted at 78 Guilford Street (ref: 2012/6203/L & 2012/6168/P) for its change of use from a nurses’ hostel to 4 residential flats (Class C3). A further planning and listed building consent application for the conversion of the

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building from a nurses' home to five residential flats (ref: 2018/0303/P & 2018/1104/L) is currently under determination at the property.

3.15 The following section provides an overview of the proposed Development.

## 4 PROPOSED DEVELOPMENT

- 4.1 The proposed Development is for the construction of a single-storey replacement rear extension, extension of the existing basement and internal and external renovation works to the existing residential dwelling (Class C3).
- 4.2 The Development will comprise a modest extension to the existing basement, to the rear, to provide additional living space for occupiers of the existing dwellinghouse, including a tea room, guest bedroom and additional lightwell.
- 4.3 The proposal will include a single-storey rear extension at ground-floor level replacing the existing rear extension. The rear extension will be formed of two diagonally connected rooms, forming two separate courtyards.
- 4.4 A timber roof terrace is proposed above the rear extension, for the enjoyment of residents of the property. A privacy screen will run along the south of the roof terrace protecting the amenity of neighbouring properties.
- 4.5 A new secondary staircase between the second and third floors will be provided, replacing the existing staircase and returning the space to a more traditional Georgian condition and arrangement.
- 4.6 The proposal will remove the existing unapproved works which have been detrimental to the historic fabric of the building and will reinstate traditional Georgian features which have been lost as a result of previous works. These works include the following:
- reinstatement of historic metal balconies, with pattern, colour and materiality matching the historic reference;
  - new internal doors to reflect the building's Georgian style and heritage;
  - refurbishment of existing windows of heritage value and replacement Georgian-style window, where necessary;
  - new timber, tiled and stone floor finishes;
  - new skirting and cornicing to match the existing historic style, where required; and
- 4.7 The proposed Development will also include general improvements to the existing building's external elevations, including the following works:
- New slate roof tiles to match the existing;
  - Additional roof-lights are proposed to sit on inner pitches and gully of the roof so as not to be seen by the public realm.
  - Existing external brickwork between first and second floors of the front elevation and second and third floors of the rear elevation, which is in a poor state of repair, to be repointed, tinted and coloured to match the existing condition of the remaining building;
  - New render finish at basement level of the front elevation to replace the existing render finish, which is in a poor state of repair;
  - New stone staircase to the basement along the front elevation, reconfigured to avoid obstruction to the easternmost basement window. This will replace the existing staircase

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- New front door to match style and colour of existing door.
- 4.8 The proposal will include improvements to the building's sustainability, such as high-performance thermal insulation at the roof and basement, refurbishment of all windows, full upgrading of existing services and secondary glazing to all existing openings.
- 4.9 For further information on the proposal, please see the accompanying Design & Access Statement and drawings.
- 4.10 The following section assesses the proposal's acceptability in regard to local and national planning policy.



## 5 PLANNING POLICY

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be considered in accordance with the statutory Development Plan and other material considerations.
- 5.2 The National Planning Policy Framework (NPPF), published in July 2018 and updated in February 2019, forms the national planning policy guidance document, and is supported by the National Planning Practice Guidance, which is an online resource.
- 5.3 Camden's Development Plan is formed of the following policy documents:
- London Plan (2016);
  - Camden Local Plan (July 2017);
  - Camden Planning Guidance: Basements (March 2018);
  - Camden Planning Guidance: Altering and Extending your Home (March 2019); and
  - Camden Planning Guidance: Design (March 2019).
- 5.4 On the Council's adopted Policies Map (2014), the Site is within the Bloomsbury Conservation Area. The Site is also located to the north, but outside of, the Holborn Growth Area, as well as the London Suburbs Archaeological Priority Area.
- 5.5 The Greater London Authority (GLA) consulted on the draft New London Plan between December 2017 and March 2018. The GLA further published an updated version of the draft London Plan with minor amendments in August 2018. The examination in public commenced in January 2019 and, whilst the draft remains a material consideration in planning decisions, it currently carries limited weight as the examination sessions are ongoing and the Inspectorate is yet to issue their report.

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

- 5.6 The National Planning Policy Framework (NPPF) was published on 24th July 2018 and updated on 19 February 2019. It is the document which sets out the Government's overarching planning policies for England and how these are expected to be applied.
- 5.7 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, whilst paragraph 8 sets out the three dimensions to sustainable development: economic, social and environmental.
- 5.8 Paragraph 8 also states that these roles should not be undertaken in isolation and it outlines that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. Paragraph 10 states that a presumption in favour of sustainable development is at the heart of the NPPF.
- 5.9 Paragraph 127 outlines that planning decision should ensure that developments are:
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; and



- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
- 5.10 Paragraph 192 states that, in determining applications which affect heritage assets, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.11 Paragraph 196 also states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 5.12 The following local policies within Camden's Local Plan are considered to be relevant to the proposal:

**Camden Local Plan (July 2017):**

- Policy H1 (Maximising Housing Supply);
  - Policy H3 (Protecting Existing Homes);
  - Policy A1 (Managing the Impact of Development);
  - Policy A5 (Basements);
  - Policy D1 (Design);
  - Policy D2 (Heritage);
  - Policy CC1 (Climate Change Mitigation);
  - Policy CC2 (Water Flooding);
  - Policy T1 (Prioritising Walking, Cycling and Public Transport); and
  - Policy T2 (Parking and Car-Free Development).
- 5.13 The following section of this statement assesses the proposed Development against relevant policies.

## 6 PLANNING APPRAISAL

- 6.1 The section provides an appraisal of the Development on the basis of the local, regional and national planning policy context provided in Section 5, above.

### Principle of Development

- 6.2 Policy H1 states that the Council will seek to exceed the target for additional homes, particularly self-contained homes, by regarding self-contained housing as the priority land-use of the Local Plan and ensuring that homes are occupied.
- 6.3 Policy H3 outlines that the Council will aim to ensure that existing housing continues to meet the needs of existing and future households and resist development that would involve a net loss of residential floorspace.

### Assessment

- 6.4 The proposal will retain the building's use as a family dwellinghouse and will extend and alter the dwelling to improve its quality, thereby ensuring its long-term use and suitability as a residential dwellinghouse.
- 6.5 In turn, the proposal will help to reinforce and secure the Council's stock of existing housing, which is considered to be the priority land-use within the Borough, as per Policy H1.
- 6.6 As such, the proposal therefore accords with policies H1 and H3 of the Camden Local Plan and is considered to be acceptable in principle.

### Basement Development

- 6.7 Policy A5 notes that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:
- neighbouring properties;
  - the structural, ground, or water conditions of the area;
  - the character and amenity of the area;
  - the architectural character of the building; and
  - the significance of heritage assets.
- 6.8 Policy A5 also outlines that, in determining proposals for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.
- 6.9 Policy A5 also states that the siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:
- not comprise of more than one storey;
  - not be built under an existing basement;
  - not exceed 50% of each garden within the property;

- be less than 1.5 times the footprint of the host building in area;
  - extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
  - not extend into or underneath the garden further than 50% of the depth of the garden;
  - be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and
  - avoid the loss of garden space or trees of townscape or amenity value.
- 6.10 Policy A5 also requires applicants to demonstrate that proposal for basements:
- do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';
  - avoid adversely affecting drainage and run-off or causing other damage to the water environment;
  - avoid cumulative impacts;
  - do not harm the amenity of neighbours;
  - provide satisfactory landscaping, including adequate soil depth;
  - do not harm the appearance or setting of the property or the established character of the surrounding area;
  - protect important archaeological remains; and
  - do not prejudice the ability of the garden to support trees where they are part of the character of the area.
- 6.11 The Camden Planning Guidance: Basements provides further information on the development of basements within the Borough, and states that the Council considers a single storey for a basement to be approximately 3 to 4 metres in height.

### Assessment

- 6.12 The proposal has retained Option 3 for the proposed basement development, as per the recommendations set out in the Council's formal pre-application response enclosed in **Appendix A**.
- 6.13 Whilst the proposed basement extension would deviate from the Council's policy and guidance on basements in that it exceeds 50% of the garden, extends further than 50% of the depth of the garden and is not set back from neighbouring property boundaries, it should be noted that there is an existing basement at the Site, and that the proposal constitutes a modest extension which will only marginally extend over the established requirements, as outlined in the accompanying Design and Access Statement.
- 6.14 The basement extension will not extend beyond the width of the existing basement and will solely consist of a single-storey, full-width rear extension. The proposal will comprise the removal of the current complex arrangement of saunas and works under the stairs, which damage the stair's fabric and detrimentally impact on the character and appearance of the listed building, and their

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- replacement with more appropriate elements. As such, the proposed basement works will enhance the building.
- 6.15 This is further reinforced by the pre-application written response, which considers the extension to the existing basement to be acceptable in principle.
- 6.16 A Basement Impact Assessment, prepared by Green Structural Engineering Ltd, has been submitted in support of the proposed Development. The assessment provides a design and construction methodology for the proposed basement and notes that this will deal with potential risks and ensure that the excavation and construction of the proposed basement will not affect the structural integrity of the property and adjoining properties. The assessment also outlines that the proposed Development will not impact upon existing and surrounding utilities, flooding, drainage, sewage and surface and ground water levels and flows.
- 6.17 A Drainage Report, prepared by Green Structural Engineering Ltd, has been submitted as part of the application. The report outlines the proposed drainage strategy for the Development, and notes that, on this basis, the proposal will be acceptable in terms of drainage.
- 6.18 A Structural Report, prepared by Green Structural Engineering Ltd, has been submitted as part of the application. The report outlines the proposed works to reinforce and ensure the building's structural stability.
- 6.19 The Drainage and Structural Reports also contain a Construction Management Plan, which provides a sequencing of works, as well as a number of actions to reduce any potential impacts from noise, dust and vibration on neighbouring occupiers.
- 6.20 The proposed basement will benefit from suitable levels of internal daylight and sunlight through the introduction of two lightwells to the rear, providing light for the tea room and two bedrooms, as well as two windows to the front, providing light for the living room/kitchen. This is in accordance with the Camden Planning Guidance: Basements, which outlines that lightwells to the rear of a property is most often the most appropriate way to provide light to a basement development.
- 6.21 The lightwells have been carefully located to fit within the proposed courtyards separating the rear extension and will not impact upon the garden space. Additionally, no lightwells or changes to the front elevation's fenestration is proposed, and the Development will therefore retain the building's existing character and heritage. The proposal has also been carefully designed to ensure that the proposed lightwells are of a suitable size and are not excessively large.
- 6.22 The proposed basement will also contain both internal access to the dwelling's upper floors and a separate external access to the front, thereby allowing for suitable evacuation. The Site is located within Flood Zone 1 and is therefore within an area which is at low risk of flooding.
- 6.23 As such, the proposal can be considered to be subordinate to the existing building, respecting the original design and proportions of the building, and will not impact upon the structural integrity of the Site and its neighbouring properties, and is therefore considered acceptable.

### Design

- 6.24 Policy A5 outlines that basement will only be permitted where the proposal would not cause harm to the character and amenity of the area, as well as the architectural character of the building.

- 6.25 Policy D1 seeks to secure high quality design in development and requires that development:
- respects local context and character;
  - is of sustainable and durable construction and adaptable to different activities and land uses;
  - comprises details and materials that are of high quality and complement the local character; and
  - for housing, provides a high standard of accommodation.
- 6.26 The Camden Planning Guidance: Altering and Extending your Home states that contemporary design approaches in alteration and extensions must be sensitive to the property and its context. Additions or alterations must complement the property without eroding or harming its character and the surrounding area or having a negative impact on neighbouring amenity.
- 6.27 The guidance also notes that alterations to a property and the materials used should always be complementary to the existing building and its original features.
- 6.28 The guidance states that a single storey ground floor extension is generally preferable to those proposed at higher levels/floors, as extensions above ground floor tend to have greater negative impacts on neighbouring amenity.
- 6.29 The guidance also outlines that proposals for rear extensions should:
- be secondary to the building being extended, in relation to its location, form, scale, proportions, dimensions and detailing;
  - be built from materials that are sympathetic to the existing building wherever possible;
  - allow for the retention of a reasonably sized garden;
  - retain the open character of existing natural landscaping and garden amenity, including that of neighbouring properties, proportionate to that of the surrounding area; and
- 6.30 The guidance states that the width of a rear extension should be designed so that it is not visible from the street and should respect the rhythm of existing rear extensions in neighbouring Sites.

### Assessment

- 6.31 The replacement rear extension will reflect the scale of the existing rear extension, being of a single-storey height, and will represent a significant improvement over the existing extension. As outlined in the Built Heritage Assessment, the removal of the existing poor-quality extension and aviary are considered to be positive works, as these elements do not contribute to the building's significance.
- 6.32 Furthermore, the proposed divided rear extension was included within the scheme subject to pre-application discussions, and the officer, in his formal response, acknowledged that the extension's division could preserve the value of the amenity space and openness and character of the rear garden.
- 6.33 The proposed rear extension will be of a high-quality design and will provide a high standard of accommodation for occupiers of the dwelling, and will be subservient to the building through the use of lightweight materials and design, thereby minimising visual impact.

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- 6.34 The proposal will reinstate the historic balconies at first floor level and will repoint, tint and colour the existing external brickwork to match the existing condition. The proposed external refurbishment works will be of a high quality and will provide a notable improvement to the building's appearance. The Built Heritage Statement confirms that the proposed works will bring notable improvements to the building's significance, heritage and character.
- 6.35 As such, the proposal will therefore respect the local context and character of the listed building and wider Conservation Area.
- 6.36 The proposal is therefore considered to provide a high-quality design, in accordance with policies A5 and D1 of the Local Plan, as well as the Camden Planning Guidance: Altering and Extending your Home

### Heritage

- 6.37 Policy A5 outlines that basements will only be permitted where the proposal would not cause harm to the significance of heritage assets.
- 6.38 Policy D1 requires development to preserve or enhance the historic environment and heritage assets, in accordance with Policy D2.
- 6.39 Policy D2 requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. Policy D2 also resists the total or substantial demolition of a listed building.
- 6.40 The Bloomsbury Conservation Area Appraisal outlines that the Council will encourage owners to maintain their buildings regularly to ensure their condition is improved or appropriately and adequately maintained so that important historic buildings and their architectural features are preserved.
- 6.41 The Appraisal states that, in all cases, the Council will expect original architectural features and detailing to be retained, repaired, protected, or refurbished in the appropriate manner, and only replaced where it can be demonstrated that they are beyond repair
- 6.42 The Camden Planning Guidance: Altering and Extending your Home states that rear extensions should:
- respect and preserve the historic pattern and established townscape of the surrounding area, including the ratio of built to unbuilt space; and
  - respect and preserve the historic pattern and established townscape of the surrounding area, including the ratio of built to unbuilt space.

### Assessment

- 6.43 The proposal will reinstate a number of historical features which have been lost as a result of continued unauthorised works to the building.
- 6.44 A Built Heritage Assessment, prepared by CgMs, has been submitted as part of this application. The assessment outlines that the modifications to the building's internals have had a noteworthy impact on the significance of the building, with historical proportion of the rooms having been altered and few historical architectural features remaining.

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- 6.45 The assessment also notes that, due to the change of brickwork at the rear, it is likely that the northern elevation has been rebuilt, and that the original fabric of the building and, in turn, its significance, is primarily found within the exterior of the principal elevation.
- 6.46 The assessment then evaluates the impact of the proposal on affected heritage assets and determines that the potentially harmful elements of the proposal are likely to be outweighed by other elements of the scheme and, overall, the proposal has the potential to enhance the significance and appreciation of the significance of 79 Guilford Street.
- 6.47 The assessment also determines that the proposal will not cause harm to the significance of surrounding heritage assets, and therefore concludes that the proposed Development is in accordance with relevant legislation, policy and guidance.
- 6.48 The proposal is therefore considered to have a beneficial impact on the listed building and the wider Conservation Area, and therefore accords with the requirements of policies A5, D1 and D2, as well as the Bloomsbury Conservation Area Appraisal and the NPPF.

### Neighbouring Amenity

- 6.49 Policy A1 states that the Council will seek to ensure that the amenity of communities, occupiers and neighbours is protected, including visual privacy and outlook.
- 6.50 Policy A5 states that basement development will only be permitted where the proposal would not cause harm to neighbouring properties.
- 6.51 The Camden Planning Guidance: Altering and Extending your Home requires rear extensions to not cause a loss of amenity to adjacent properties with regard to daylight, sunlight, outlook, light pollution and privacy.

### Assessment

- 6.52 The proposed rear extension will span a single storey, reflecting the scale and siting of the existing rear extension and neighbouring extensions, and will therefore not lead to a loss of outlook or loss of light over the existing rear extension at the Site.
- 6.53 It is considered that the principle of a terrace has been established by the neighbouring terrace at 80 Guilford Street. It should also be noted that the Council, in their formal pre-application response, did not raise any concerns with the proposed terrace and its impact on neighbouring amenity.
- 6.54 The proposal will include a privacy screen along the western side of the rear terrace, so as to prevent any potential overlooking and loss of privacy into neighbouring properties. Furthermore, there is an existing privacy screen between the Site and 80 Guilford Street, to the east of the Site, which further prevents overlooking and loss of privacy to the property. As such, the proposed terrace and balcony will not lead to loss of privacy or overlooking to neighbouring properties.
- 6.55 Whilst there is a window to the rear of 3-5 Colonnade facing the Site, the building in question is used as a photographer's studio and is therefore not a sensitive use. Nevertheless, the proposed rear extension and terrace will not allow for increased views to the affected window, as they are of a similar siting and scale, and will therefore retain the existing relationship between the Site and building to the rear.



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- 6.56 The proposal is therefore considered to be acceptable with regard to its impact on neighbouring amenity, and is therefore in accordance with policies A1 and A5 of the Local Plan, as well as the Camden Planning Guidance: Altering and Extending your Home.

### Energy & Sustainability

- 6.57 Policy CC1 states that the Council will support and encourage sensitive energy efficiency improvements to existing buildings.
- 6.58 Policy D1 requires development to be sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation

### Assessment

- 6.59 The proposed Development will include improvements to the building's sustainability, such as high-performance thermal insulation at the roof and basement, refurbishment of all windows, full upgrading of existing services and secondary glazing to all existing openings. The proposal therefore accords with the requirements of policies CC1 and D1.

### Transport

- 6.60 Policy T1 states that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.
- 6.61 Policy T2 seeks to limit the availability of parking and requires all new developments in the borough to be car-free.

### Assessment

- 6.62 The proposed Development constitutes minor extensions and alterations to an existing family dwellinghouse, and therefore does not trigger a requirement for additional cycle space.
- 6.63 Furthermore, the number of trips associated with the Site will not increase due to the nature of the proposed Development. The S106 legal agreement attached to the previous consent also requires the site to be car-free, and the proposal of additional development
- 6.64 On this basis, the proposal is considered to be acceptable in transport terms, and therefore accords with the requirements of policies T1 and T2.

### Summary

- 6.65 The proposal will ensure the long-term use of the building as a dwellinghouse, and will therefore reinforce the Council's existing stock, in accordance with the land-use priorities set out within the adopted Development Plan.
- 6.66 The proposed extension to the basement will be moderate and will respect both the character of the listed building and Conservation Area, as well as the amenity of neighbouring occupiers.
- 6.67 The rear extension has been designed in a manner which respects the historical arrangement of the listed building. The extension will comprise a single storey and will therefore be of a scale which respects local vernacular and heritage.

## REPORT

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- 6.68 The Development will comprise a number of internal and external alterations and renovations which will help to reinstate the building's architectural heritage. In turn, this will bring significant improvement to a listed building which has suffered a number of damaging and unapproved alterations and was recently on Heritage England's At Risk Register. The proposal will therefore strengthen the character of the wider Bloomsbury Conservation Area.
- 6.69 The proposal will include sensitive and well-located screening on the rear terrace so as to ensure that the Development does not lead to overlooking or loss of privacy to neighbouring properties.

## 7 OVERALL CONCLUSIONS

- 6.70 The proposal is for the construction of a single-storey replacement rear extension, extension of the existing basement and internal and external renovation works to the existing residential dwelling (Class C3).
- 6.71 The Site is located in a highly accessible location and within Flood Zone 1. The Site is located within the Bloomsbury Conservation Area and forms part of a Grade II listed terrace of Georgian Houses.
- 6.72 The proposal will provide a modest extension to the existing basement to provide additional living space. The proposed extension is minimal and will not impact upon the structural integrity of the building, character of the area or amenity of neighbouring occupiers.
- 6.73 The demolition of the existing rear extension, which does not form part of the fabric of the original building, and provision of a new rear extension is also proposed. The new rear extension will provide a notable improvement to the building. The extension has been carefully designed to reflect the historic arrangement of the rear of the building and will respect the local character and scale.
- 6.74 The proposal will also include a rear terrace including a privacy screen, thereby preventing overlooking and loss of privacy and protecting the amenity of neighbouring properties.
- 6.75 The proposal will comprise a number of internal and external alterations to the building, which will reinstate the previously lost historic features of the building. The proposal has been carefully designed to provide high-quality enhancements to the listed building, the historic fabric of which has been significantly harmed as a result of a number of unauthorised works.
- 6.76 Overall, the proposal is considered to be supported by adopted and emerging planning policy, and will safeguard the heritage and future use of the Site. It should accordingly be granted planning permission and listed building consent.

## Appendix A

### December 2018 Pre-Application Formal Response

**Date:** 18/12/2018  
**Our Ref:** 2018/4487/PRE  
**Contact:** Charles Rose  
**Direct Line:** 020 7974 1971  
**Email:** Charles.rose@camden.gov.uk

**Planning Solutions Team**  
**Planning and Regeneration**  
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2<sup>nd</sup> Floor  
5 Pancras Square  
London  
N1C 4AG

[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Dear Mr. Gaylor

**Re: 79 Guilford St London WC1N1D**

Thank you for submitting a pre-planning application enquiry for the above property which was valid from 24/09/2018. A site visit was attended by Charles Rose on the 31<sup>st</sup> October and additional information was provided by you between the 4<sup>th</sup> December and 13<sup>th</sup> and 16<sup>th</sup> December 2018.

The following comments have been assessed against revised *Submissions document A010 Guilford St December 2018 Pre-application response* (79pages).

The revised submission pack largely picks up the discussion points from the site visit. I have sought to respond to these in turn but also give a more general overview of the scheme i with specific regard to its recent history including enforcement history.

### **1. Proposal**

The proposals include:

#### **Roof:**

Erection of a roof terrace formed between the existing roof pitches with new staircase access from third floor level.

#### **Third Floor:**

New Bathroom along the eastern party wall which straddles the spine wall. Options for the reinstatement of plaster ceilings (EN).

#### **Second floor:**

Layout largely retained as existing. Reinstatement of door to the rear room (EN). Replacement of the secondary staircase to third floor level with square section metal balusters.

#### **First floor:**

Insertion of a kitchen to the front room. Works to address the unauthorised insertion of WC to the landing (EN). Reinstatement of decorative guard rails to front room windows and insertion of balcony with access to the half landing flat roof extension.

#### **Ground floor:**

Reinstatement of the vestibule through the erection of new partition separating the front room (EN), including new storage niche and lobby. Reinstatement of the down stand and nibs between front and rear room (EN). Demolition of existing garden extensions and erection of new full-depth part-width ground floor extension with off set courtyard spaces.

#### **Basement:**

Excavation of part of the garden to create habitable accommodation and new lightwell with various options for this location. Subdivision around the spine wall to create bathroom and WC.

### **Servicing**

Lowering the raised floor levels and the installation of under floor heating or trench heaters throughout. New engineered floor boards throughout. Location of all vertical risers shown. New insulated basement slab with under floor heating

### **General**

Replacement of the main staircase from ground to second floor with a preferred option for cantilevered stone stair and metal square section balustrade.

Windows and shutters retained. Secondary glazed to not interfere with the operation of the shutters.

## **2. Site description and significance**

The site is a traditional Georgian townhouse constructed between 1793 and 1799 by James Burton, a key figure in the area's development. It has a lower ground floor, ground floor, and three storeys above. It forms part of a wider terrace of similar buildings, and sits within the Bloomsbury Conservation Area, which is of international significance for Georgian town planning. The area was primarily residential but over time the introduction of significant institutional uses has made it more mixed use, as has the introduction of office and hotel uses, some of which are in the original residential properties.

The site forms part of a wider terrace, all of which is grade II listed. The houses were constructed on a grander scale than others in the area, and the terrace once formed the northern part of Queen Square. The terrace comprises a palace front between nos.70-73 cascading out with symmetrical facades to no.61 to the west and no.82 (rebuilt) to the east. To the north is Colonnade, a mews development dating from the 19th century which was built to serve the larger houses to the south, and the buildings are listed as positive contributors to the conservation area.

Nos. 77-82 Guilford Street were on Historic England's Heritage at Risk register until recently. Their condition was described as poor (on a scale of good, fair, poor and very bad), and they are classified as 'C' ('Slow decay; no solution agreed', with A being the most at risk, and F being the least). Nos. 66 Guilford Street and 70-72 Guilford Street are also on the list. The building has been used as 16 non-self-contained units for nurses, but more recently has been run as a hostel, which is the subject of an enforcement notice to require the use to cease.

The special interest of the building has been reduced over the years through inappropriate alterations and institutional use. Along the terrace there had been lateral conversion between the properties which has reduced the ability to read and appreciate the building as an individual townhouse. Rooms had been sub-divided from the original plan form to create smaller bedrooms, and many of the architectural features of the buildings have been lost. The need to install steel members throughout the properties has also compromised the original structural integrity. Therefore, the special interest of the terrace buildings largely resides in the external character and appearance, particularly in the value that the facades make to the architectural composition of the terrace as a whole. However, this then impacts on the internal layout and emphasises the importance of ensuring that the proportions of the front rooms, the staircase compartments, and the remaining detailing, are appropriate. Moreover the 2013 permission successfully gained consent to restore the building to a single family dwelling as part of a package of schemes at 5 other sites, which collectively cover nos. 77, 78, 79, 80, 81 and 82 Guilford Street. The building also retains its original roof form (the age of the roof fabric has not been investigated), this is a key part of the building interest.

Subsequent unauthorised works carried out as part of the 2013 permission went beyond what the council granted consent and some of the existing works are considered to result in harm to the special interest of the listed building. Works which are carried out to a listed building without consent and which result in harm are a criminal offence and your clients, as the owners of the building, are now liable for these unauthorised works.. The works highlighted with an **EN** are those *expected* by the Council to be undertaken and must be reinstated to overcome the works which took place by the former owner. Because the existing works to the

areas affected were carried out without consent and also cause harm to the special interest of the listed building they have not been taken into account in the overall assessment of the pre-application scheme.

Other works which have been carried out without consent and need to be rectified as part of any application include the replastering of the area internally where brickwork is currently exposed and the removal of the dropped ceilings.

### **3. Relevant planning history**

2013 - Change of use from nurses' hostel (Sui Generis) to single-family dwelling house (Class C3). Internal alterations in connection with change of use from nurses hostel (Sui Generis) to single-family dwelling house (Class C3). 2012/6170/P / 2012/6198/L

### **4. Relevant policies and guidance**

**National Planning Policy Framework 2012**  
**Planning and (Listed Building and Conservation Area) Act 1990**  
**The London Plan March 2016**

#### **Camden Local Plan 2017**

D1 Design  
D2 Heritage

**Camden Planning Guidance 2011/2015**  
CPG1 (Design)

### **5. Design/Heritage Assessment**

The main issues to consider are the impact that the works would have on the significance of the grade II listed building. The assessment is heavily influenced by the building's recent history, including its removal from Historic England's Heritage At Risk register.

#### **Roof:**

The erection of a roof terrace is likely to cause harm to the special interest of the building because of interference to the roof form and valley beam. Option 2 would remove part of the historic roof form and could not be supported. There is no record of works to the roof of no. 74 Guilford Street and no. 73 is a recent replica new build following fire damage. If Option 1 can be demonstrated that the terrace is removable and could sit between the existing roof pitches with relatively little interference, then an argument could be made to support this aspect of the works. However, the associated staircase would result in loss of the valley beam which forms an important part of understanding the building's structure and layout. It is therefore unlikely to be acceptable.

The harm caused from the loss of the beam could be outweighed by other heritage benefits to the proposals. However, notwithstanding the works required because of the unauthorised works it is considered that there are insufficient benefits to outweigh the harm.

#### **Third Floor:**

The installation of a new bathroom between the front and rear rooms is likely to be acceptable at this level. As above, care needs to be given to respecting the valley beam and this may affect head heights in the space.

The ceilings at this level were removed without consent. The ceiling removal results in the loss of hierarchy and character of the affected spaces. The ceilings need to be reinstated at least in part. LB Camden has given consent for similar works to those shown in Option 1 along the terrace and this could be something that we would support as part of package of high quality works.

#### **Second floor:**

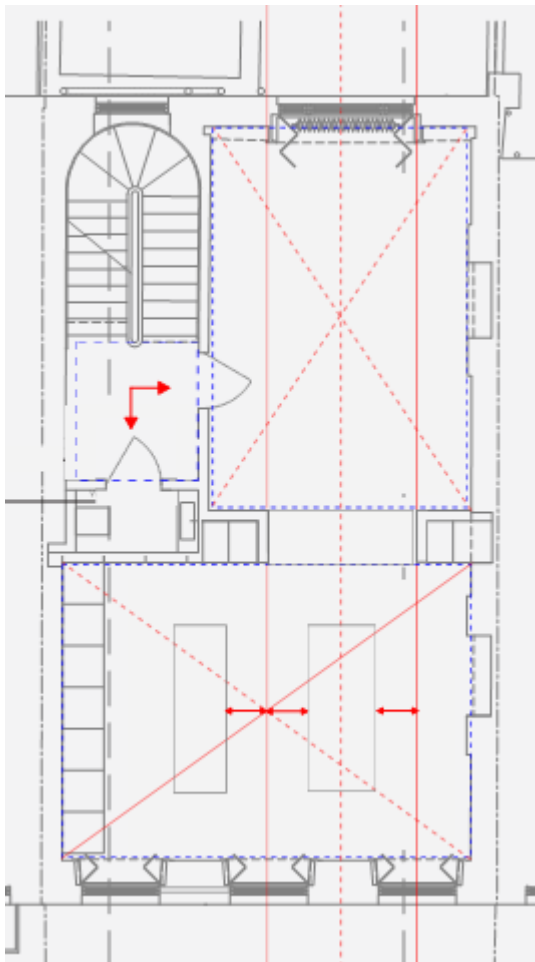


The secondary staircase is modern addition to the building. As a result, it could be replaced with a newer version as long as it respected the historic position and style of a secondary staircase. The proposed position and shape is considered acceptable subject to detail. The stair design would need to remain secondary to that of the main stair. In this respect a simple square section metal balustrade with thin metal handrail is likely to be acceptable as it would marry with the age and style of the building. However, I would recommend one or two balustrades per tread to show a reduction in hierarchy and status. Any new staircase here should also be timber and not stone/precast.

#### **First floor:**

It would be possible to install the kitchen at first floor level subject to design and services as part of an enhancement to the historic layout and spatial qualities of the first floor. This is largely due to the ability of the proposed scheme to improve upon the 2013 permission which allowed the rear room to be divided. The units along the spine wall should be designed with integrated cabinets with jib doors to appear as a wall. The units running perpendicular to the front wall and the island should be low level and designed as pieces of furniture. The waste should run behind the units. The extract should be recirculating. A false wall above the low level units should be avoided in preference of installing a recirculating extract.

I have considered the layout options carefully and adapted your preferred option and Option 4 to offer an alternative which would be the most appropriate from a heritage point of view. This retains the WC as a larger landing would be required that would align to the door to reinstate an historically accurate staircase enclosure. It is important to reinstate the spine wall but it is possible to have an opening between the two rooms.



- *Alternative first floor plan layout which reinstates the vestibule plan form with traditional sized, designed and positioned doors to front and rear rooms; reinstatement of ribs and downstand to the spine wall aligned to respond to the classical proportions of the interior.*

Installing front guard rails to the front elevation would enhance the appearance of the façade. Please note these would be aesthetically incorrect if 1100mm high and also would not

therefore be used for access. It is possible to convert the modern rear window to a door and create a balcony in a similar manner to others along the terrace without causing harm. A simpler form of balustrade is preferred.

#### **Ground floor:**

Creating a niche in the reinstated entrance wall is possible if jib doors are used to conceal the storage space from the hall side. The unit would have to be concealed on the roof side with fitted furniture (as shown) otherwise it would disrupt the proportions of the room.

Many of the buildings along the terrace have deep single storey part-width extensions. Replacing the existing extension with a similar structure could be possible. Dividing this into two separate spaces is more controversial but could preserve the value of the amenity space (be mindful of the loss of amenity space) and could, if handled carefully, preserve the openness and character of the rear garden. In this regard, the landscaping of the spaces, including the roofs of the extensions becomes critical as this is how the accommodation would be appreciated and viewed from neighbouring buildings. It is important that the rear extension is set lower to break up the mass and its design should be influenced by a garden structure and feel part of the garden rather than part of the house.

#### **Basement:**

It could be possible to extend the basement to create a room behind the existing well with minimal impact on the special interest of the listed building subject to the necessary structural information. The physical manifestation of the new room (the wall facing the existing lightwell) is an important aspect of the design. For this reason, my preference is option 3 because it can allow for limited apertures compared with the tea room option and therefore can be designed to reveal less of the new habitable area beneath the garden. Option 3 also allows for a more traditional location for a lightwell behind the tea room.

The insertion of the new bathroom and WC in the main part of the house would not harm the plan form at this level.

The necessary BIA would need to be provided as part of any planning application (see below).

#### **Servicing**

The location of the vertical service risers are adequately concealed and acceptable. Given the changes which have occurred to the floor structure and loss of historic floorboards it would be possible to install wet under floor heating or trench heaters without causing harm subject to lowering the floor to its original level and installing wide oak boards.

I did not examine the main staircase as part of my site visit and cannot therefore comment on its age and value. However, the staircase is one of the most important elements in buildings of this age and as such, a stair in anything like its original condition or which is historic interest should be retained. Any proposal to replace the stair would need to be supported with very robust heritage support. Staircase removal is invasive in terms of historic fabric and any continued plans to undertake this work would have to be very strongly justified or significantly outweighed by genuine heritage benefits. It is likely that its removal would be resisted. Please also be aware the loss of the stairs would result in Historic England being consulted as part of the application.

The awkward junction at the top of the staircase does need to be addressed. In my view Option 3 would be the most appropriate in this regard



Option 3. Preferred layout for the junction between 2<sup>nd</sup> and 3<sup>rd</sup> floor

## 6. Basement

### Principle of basement development

Policy A5 states that *“In determining proposals for basements and other underground development, the Council will require an assessment of the scheme’s impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.”* Further guidance on the processes and recommendations for Basement Impact Assessments is set out within CPG4 (Basement and Lightwells 2015) and associated Camden geological, hydrogeological and hydrological study 2010 (referred to below as the ‘Arup report’).

As such, any planning application for additional excavation into the garden on this site would need to include a Basement Impact Assessment (BIA), which has been prepared in accordance with the processes and procedures as set out within CPG4.

This site is subject to an underground development constraint, such as subterranean groundwater flow and slope stability. As a result, the submitted BIA will be required to be independently assessed by a third party, at the applicant expense, to satisfy the Council that the development would not lead to any unacceptable impacts on the groundwater flows, land stability and surface flows of the area should the development be granted.

For completeness please ensure that the report details the author’s own professional qualifications. Please also note that CGP4 requires the following qualifications for the different elements of a BIA study or review:

#### Surface flow and flooding

A Hydrologist or a Civil Engineer specialising in flood risk management and surface water drainage, with either:

- The “CEng” (Chartered Engineer) qualification from the Engineering Council; or a Member of the Institution of Civil Engineers (“MICE”); or
- The “C.WEM” (Chartered Water and Environmental Manager) qualification from the Chartered Institution of Water and Environmental Management.

#### Subterranean (groundwater) flow

A Hydrogeologist with the “CGeol” (Chartered Geologist) qualification from the Geological Society of London.

#### Land stability

A Civil Engineer with the “CEng” (Chartered Engineer) qualification from the Engineering Council and specialising in ground engineering; or

- A Member of the Institution of Civil Engineers (“MICE”) and a Geotechnical Specialist as defined by the Site Investigation Steering Group with demonstrable evidence that the assessments have been made by them in conjunction with an Engineering Geologist with the “CGeol” (Chartered Geologist) qualification from the Geological Society of London.

As the BIA will require a third party audit, it will be expected that your report is in line with the Council’s Pro Forma. A Basement Impact Assessment AUDIT: Instruction form has been included for your information, please see Section B for a full list of items to be included in your Basement Impact Assessment (BIA). You will need to fill out this section of the form and return to us alongside any formal submission.

Please note that the Council’s approved provider for the audit service is Campbell Reith. When an audit is required, Campbell Reith charges a fixed fee dependant on the category of basement audit. These categories and the relevant fixed fees are set out below. Considering the existing hydrological constraints on site such as surface water flow and flooding, your proposal might fall within Category B. The Campbell Reith Audit will certify this category once you applied and completed the Pro Forma.

#### Category A - £997.50

Residential or commercial development with single storey basement where the Screening Stage of the Basement Impact Assessment indicates no matters of concern which need further investigation.

Submitted BIA anticipates no significant impact relating to:

- land stability or impacts, buildings or infrastructure;
- groundwater flow or surface water flooding and underground tunnels

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Residential single basement or commercial development with single or double basement where the Screening Stage of the Basement Impact Assessment identifies matters of concern which need further investigation

Submitted BIA anticipates potential impact:

- to a listed building;
- on land situated adjacent to a building;
- on ground water flow;
- on potential for surface water flooding ;
- on underground tunnels or infrastructure; and
- cumulative impact on ground stability and the water environment

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Exceptional development (in terms of geometry, area, depth or complexity) which may be a single or double basement with potential complications. This category would be charged at an agreed rate on a case by case basis taking consideration of the complexity.

Submitted BIA anticipates potential for significant impact:

- to a listed

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- on other buildings and or with land stability issues;
- to groundwater flow and potential for surface water flooding ;
- underground tunnels or infrastructure; cumulative basement impacts;
- relating to significant technical issues raised by third parties

### **Basement design**

Policy A5 of the Local Plan notes that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to: a) neighbouring properties; b) the structural, ground, or water conditions of the area; c) the character and amenity of the area; d) the architectural character of the building; and, e) the significance of heritage assets. Furthermore, it is highlighted that policy A5 stresses that the Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.

Policy A5 stipulates that the siting, location, scale and design of basements must have minimal impact on, and be subordinate to the host building. It also highlights that basement development should be less than 1.5 times the footprint of the host building and that it should extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation. It is noted that the property has been extended previously at the lower ground floor/basement level, and the current proposal includes further excavation to the front of the building and to the rear, with an overall area of approximately 12sqm out of an existing of 85sqm, which would be in line with the Council's policies.

CPG4 states that the Council will only permit basement development where it does not cause harm to the recognised architectural character of buildings and surrounding areas, including gardens and nearby trees. Furthermore, it states that basement developments that extend outside of the footprint of the building can have a greater impact than smaller schemes. Larger basement developments can reduce the area for water to runoff and soak away and also reduce the ability of the garden to support trees and other vegetation leading to poor landscaping, loss of amenity and local character. In addition, larger basements would require more extensive excavation resulting in longer construction periods and greater number of vehicle movements to remove the soil, which would have greater impact on the neighbouring properties through noise, disturbance, traffic and parking issues. It is therefore suggested that considering the proposed extension of the basement beyond the footprint of the building, additional landscaping would contribute positively to the environmental impacts and improve the setting of the host property.

The basement excavation would include the reconfiguration of lower ground floor level to include deeper excavation to allow greater room height at the ground floor level for the living, kitchen and dining areas, and also further projection to the front and rear. The basement extension would manifest externally through two closed lightwells with walking glass on, to the front and side of the extension. There is an established character along Pilgrim's Lane and Denning Road, in relation to front lightwells, and therefore this would be in line with policy A5 and considered acceptable in principle. The proposed lightwells, due to their size and location, are

considered to be subordinate to the host building, and would preserve the existing character and appearance of the host building and streetscene.

## **7. Other**

### Electronic submission

Please submit your application via the planning portal at:

<https://www.planningportal.co.uk/>

## **8. Conclusion**

This document represents an initial informal officers 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.

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

Yours sincerely,

Charles Rose

Principal Heritage Officer

CC

Alex Bushell, Team Leader, Planning Solutions Team

Libby Beamont, Enforcement team leader, Planning solution Team