

50C RED LION STREET,  
WC1R 4PF

**PLANNING STATEMENT**

ON BEHALF OF PATRICIA LENNOX-BOYD & JAMIE  
STEVENS

JUNE 2019

COLLECTIVE PLANNING REF JF/0226

collectiveplanning

# CONTENTS

---

1	INTRODUCTION .....	2
2	SITE CONTEXT .....	3
3	PLANNING HISTORY .....	5
4	PRE-APPLICATION CONSULTATION .....	6
5	PROPOSED DEVELOPMENT .....	9
6	PLANNING POLICY .....	10
7	PLANNING ASSESSMENT .....	11
8	CONCLUSIONS .....	21

**Appendix 1 – Pre-application 1 feedback letter dated 11/09/2017**

**Appendix 2 – Pre-application 2 feedback letter dated 13/04/2018**

# 1 INTRODUCTION

---

1.1 This Planning Statement has been prepared by Collective Planning on behalf of our client, Patricia Lennox-Boyd and Jamie Stevens, the applicant, to support a full planning and (partial) demolition in conservation area application for the proposed redevelopment at 50c Red Lion Street.

## **The Proposal**

1.2

The scheme comprises:

*“Part demolition of the existing building (in a conservation area), erection of a new front façade and external staircase on the front elevation, rebuild of chimney, raising of roof slopes and erection of a roof extension within the nook of Omnium Court to accommodate a two-bedroom residential unit with ancillary artist’s studio/gallery. Insertion of new windows and/or doors on the rear and side elevation. Provision of waste and recycling storage, cycle parking and amenity space.”*

## **Proposal Context**

1.3 The site is located in the London Borough of Camden (hereafter “LB Camden”).

## **Supporting Information**

1.4 The application comprises the following:

- Design and Access Statement (including daylight/sunlight impact assessment), prepared by David Kohn Architects;
- Drawings and plans, prepared by David Kohn Architects;
- Planning Statement, prepared by Collective Planning;
- Heritage Statement, prepared by Icen Projects;
- Archaeological Desk Based Assessment, prepared by CgMs Heritage; and
- Structural Appraisal by Structure Workshop.

1.5 Section 2 of this statement describes the site and its surrounding area. Section 3 sets out the relevant planning history. Section 4 outlines the pre-application consultations. Section 5 details the development proposals. Section 6 outlines the relevant planning policy. Section 7 comprises a planning assessment against national, regional and local planning policies and Section 8 concludes the statement.

## 2 SITE CONTEXT

---

### Site Location

- 2.1 The site is located at the end of an alleyway off the western side of Red Lion Street, behind a row of terraced houses. To the north of the site is Lamb's Conduit Passage and to the south is Princeton Street. Red Lion Square is located to the west of the site.
- 2.2 The site is located at a sustainable location with a PTAL of 6b. Holborn underground station is located approximately 300m southwest of the site. There are also bus stops located on Theobalds Road and Procter Street with services operating towards Victoria, Oxford Circus, Battersea, Waterloo, London Bridge, Willesden, Hackney, Wood Green, Finsbury Park and Leyton.

### Site description

- 2.3 The site comprises a three-storey mews house, which accommodates a two-bedroom residential unit with ancillary artist's studio and office. The courtyard to the front of the building is currently used by the existing residents for parking.

### Surrounding Area

- 2.4 The surrounding area comprises a mix of uses including residential, hotel, offices, restaurants, cafes and bars. In particular, there is a range of commercial uses fronting Red Lion Street and Theobalds Road.
- 2.5 The immediate surrounding comprises a series of buildings and terraced houses ranging from two to six storeys in height.

### Heritage and Environmental Considerations

- 2.6 The site is not statutorily or locally listed. However, it falls within the Bloomsbury Conservation Area. There are also statutorily listed buildings within close proximity of the site, including the Grade II listed buildings at 50 Red Lion Street to the east of the site, Conway Hall to the northwest, and 45 and 46 Red Lion Street to the north of the site. This is illustrated in Figure 1 below.



Figure 1 Listed building in the surrounding area

2.7 The site is not within a flood risk area as it falls within Flood Zone 1.

### 3 PLANNING HISTORY

3.1 This section sets out the relevant planning history at 50c Red Lion Street. A table of the relevant planning history is included below (table 3.1).

<b>Planning reference</b>	<b>Description</b>	<b>Decision</b>
PS9804997/	The erection of a roof extension and the insertion of windows in the rear wall in connection with the existing use of the building as a mixed use design studio with residential accommodation, as shown by drawing numbers 01, 02 & 03 dated 10th June 1998, & 04, 05, 06 dated 5th January 1999 and as amended by letter dated 3rd November 1999.	Grant Full Planning Permission (conds) 09-11-1999
PS9804997R1	Conversion and extension of existing office studio/dwelling (REVISED PLANS SUBMITTED).	Withdrawn Application-revision received 03-11-1999
PS9804997	Conversion and extension of existing office studio/dwelling (Plans submitted)	Withdrawn Application-revision received 18-02-1999

*Table 3.1 Relevant planning history at 8 Smart's Place*

## 4 PRE-APPLICATION CONSULTATION

---

- 4.1 The proposal has been comprehensively reviewed and discussed at pre-application stage with relevant Camden Council representatives. The section below sets out the two pre-application consultations that have been held and the changes that have arisen from these consultations.
- 4.2 Two pre-application consultations were held whereby the Council has provided detailed written feedback (see Appendix 1 and 2) on 11<sup>th</sup> September 2017 and 13<sup>th</sup> April 2018 (ref. 2017/3846/PRE and 2018/0301/PRE). Both pre-application proposals comprised the full demolition of the existing building and the construction of a basement.
- 4.3 The first pre-application proposed an additional storey to create a four-storey building. Following the first pre-application response, the second proposal sought to reduce the massing and scale by removing the additional storey and instead, proposed a roof extension built within the nook of Omnium Court and a double barrel vaulted roof to create double-height space on the second floor.
- 4.4 The table below summarises the key issues raised by the Council during the two previous pre-application consultations and outlines how the current proposal addresses these concerns.

Issues	Summary of pre-application (1 and 2) feedback	Proposal response
Demolition	Demolition of the building requires full heritage and structural justification. Demolition of the elevations will harm the character and appearance of the conservation area and the setting of the listed building, it is therefore unlikely to be supported.	Demolition has been reduced to a minimum and is only proposed where necessary to ensure the building is structurally robust. All proposed rebuilds will respect the character and appearance of the conservation area and the setting of the listed building. The rear elevation will be mostly retained and minor alterations are proposed only for the insertion of new windows. The front façade and chimney will be demolished and rebuilt with a similar design and appearance to the existing to ensure heritage assets are not harmed. The proposed rebuild will also improve the structural condition of the existing building. Further information is detailed in the accompanying

		Heritage Statement and Structural Appraisal.
Design/ Height	The proposed three/four storey structure with roof terrace and basement is considered to be an overdevelopment of the site, which would be harmful to the setting of the listed building. The Council however suggested the existing dormer structure could be widened to form a full storey and the rear roof slope could be raised to form a flat roof.	A basement is no longer proposed. The height of the existing building is maintained, the main part of the building is three storeys with a full storey on the second floor level, as suggested by the Council. A small roof extension is proposed within the nook of Omnium Court, however this will be concealed and hardly visible. Therefore, the proposal will not result in an overdevelopment of the site and will preserve the setting of the listed building, as well as the character and appearance of the conservation area.
Design	Design considerations should be given to the historic interests of the existing building.	The proposal will be of high-quality design. It has given careful design considerations to the historic interests of the existing building, including the retention of the rear façade and its brickwork, design of the front façade to mimic the existing rhythm, glazing design and materiality. Further details are provided in the accompanying Heritage Statement and Design and Access Statement.
Amenity impacts	The proposed bulk and massing (pre-application 2) is unlikely to cause concerns in terms of daylight and sunlight for neighbours. The roof terrace and external stairs proposed may cause overlooking.	The bulk and massing of the proposed building has been reduced. The main part of the building will be three-storeys and the small roof extension will be within the nook of Omnium Court. This will further minimise any daylight and sunlight impacts on neighbours. Further information is contained within the accompanying Design and Access Statement.  The size of the roof terrace has been reduced to an area that only fronts the nook of Omnium Court and the immediately adjacent neighbouring



		<p>windows are of privacy glass or serve communal stairs. The proposed external stairs on the front elevation will be glazed with privacy glass. The proposal will therefore minimise any overlooking impacts.</p>
--	--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

*Table 4.1 Comparison between the current proposal and the scheme presented at the previous pre-application consultations*

- 4.5 The proposed scheme is therefore shaped by the feedback from LB Camden. This ensures the proposal is of high quality design, preserves the setting, character and appearance of heritage assets and respects the residential amenity of neighbours.

## 5 PROPOSED DEVELOPMENT

---

5.1 This application comprises a full planning application for the redevelopment of 50c Red Lion Street, to improve the quality of accommodation by providing additional residential floorspace and to enhance the appearance and structural stability of the existing building.

5.2 The detailed parameters of the development are as follows:

- Demolition of the front façade and chimney;
- Minor alterations to the rear elevation for the insertion of new windows;
- Erection of a new front façade;
- Rebuild of chimney;
- Raising of rear and front roof slopes and the erection of a small roof extension within the nook of Omnium Court;
- Provision of a two-bedroom residential unit with ancillary artist's studio/gallery;
- Erection of a new external staircase on the front elevation;
- Insertion of new windows and doors on the rear and side elevation;
- Insertion of rooflights;
- Provision of a roof terrace;
- Provision of secure and accessible cycle parking; and
- Provision of refuse and recycling storage facility.

## 6 PLANNING POLICY

---

- 6.1 This section sets out the planning policy context in which development of the site should be considered. It also makes reference to key material considerations where relevant. The policies are considered in detail in the following chapter.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that decisions made under the Planning Acts are determined in accordance with the development plan unless other material considerations indicate otherwise.
- 6.3 The statutory Development Plan comprises:
- a. Further Alterations to the London Plan (March 2015, updated March 2016);
  - b. LB Camden Local Plan (July 2017);
  - c. LB Camden Policies Map (updated February 2019).
- 6.4 Other material considerations include:
- a. National Planning Policy Framework (July 2018);
  - b. National Planning Policy Guidance (2014 – updated 2019);
  - c. Draft New London Plan showing Minor Suggested Changes (August 2018);
  - d. London Plan Housing SPG (March 2016);
  - e. LB Camden Bloomsbury Conservation Area Appraisal and Management Strategy (2011);
  - f. LB Camden Planning Guidance - Design (March 2019);
  - g. LB Camden Planning Guidance – Amenity (March 2018); and
  - h. LB Camden Planning Guidance – Interim Housing (March 2019).

### **Planning Policy Designations**

- 6.5 According to Camden's Policies Map, the site has the following policy designations:
- Bloomsbury conservation area;
  - Archaeology priority area; and
  - Background assessment area (viewing corridor).

## 7 PLANNING ASSESSMENT

---

7.1 This section provides an overview of specific considerations in respect of the proposed development. It assesses the scheme against adopted and emerging planning policy for the following elements:

- Principle of part demolition and redevelopment
- Principle of residential
- Residential quality
- Design and heritage considerations
- Amenity impacts on neighbouring residents including daylight/sunlight
- Transport and access
- Sustainability
- Refuse and recycling

### **Principle of part demolition and redevelopment**

#### ***Policy context***

- 7.2 When determining planning applications, paragraph 11 of the NPPF directs LPAs to apply the presumption in favour of sustainable development in plan-making and decision-taking. It further notes that the presumption in favour of sustainable development for decision-taking means 'approving development proposals that accords with an up-to-date development plan without delay'.
- 7.3 Paragraph 118 of the NPPF encourages planning policies and decisions to give substantial weight to the value of using suitable brownfield land within settlements, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.
- 7.4 London Plan 2.9 seeks to realise the potential of inner London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and the quality of life and health for those living there.
- 7.5 Draft London Plan Policy GG2 encourages development to make the best use of land and requires planning and development to understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.
- 7.6 Policy G1 of the Camden Local Plan seeks to create conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness

the benefits for those who live and work in the borough. Camden will deliver growth by securing high quality development and promoting the most efficient use of land and buildings.

### **Assessment**

- 7.7 The site is not a statutorily listed or locally listed building but falls within the Bloomsbury Conservation Area, therefore there is limited policy protection against the demolition of the existing building. However, given the Council has noted the building's historic interests during the previous pre-application consultations, the proposed demolition of the existing building has been minimised to only where it is necessary. As such, the rear elevation will be largely retained whilst only the front elevation will be demolished and rebuilt to improve the appearance and structural condition of the building. The rebuilding of the front façade retains the existing character, whilst introducing a more contemporary interpretation of some of the key features including the triple-width opening and full-width windows.
- 7.8 The proposal will therefore preserve and enhance the historic environment, whilst ensuring the building is of high quality to improve the quality of life and living environments for future residents. This is in line with the NPPF, London Plan, draft London Plan and Camden Local Plan, as such, the principle of (partial) demolition and redevelopment is considered acceptable in this respect.
- 7.9 Further information is detailed within the accompanying Structural Appraisal and Heritage Assessment.

### **Principle of residential**

#### ***Policy context***

- 7.10 Paragraph 7 of the NPPF sets out three overarching objectives of the planning system in order to achieve sustainable development, an economic, social and environmental objective. The social objective seeks 'to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.
- 7.11 Paragraph 59 of the NPPF notes the Government's objective of significantly boosting the supply of homes and recognises that it is important a sufficient amount and variety of land can come forward where it is needed.
- 7.12 The latest iteration of the London Plan makes clear that LB Camden must contribute more homes than it had previously committed in order to support London in meeting its future needs; with a target of 889 units per annum between 2015-2025. The draft new London Plan has increased this target to 1,086 units per annum between 2019/20 – 2028/29.
- 7.13 London Plan Policy 3.3 seeks to increase housing supply and states that there is a '*pressing need for more homes in London*'. Part D of the policy states that boroughs should seek to achieve and exceed the relevant minimum borough target, and specifically encourages intensification and mixed-use redevelopment.

- 7.14 The Draft London Plan Policy H2 states that small sites (development of 1-25 homes) should play a much greater role in housing delivery. Part D of the policy states that borough should apply a presumption in favour of small housing development which provide between one and 25 homes.
- 7.15 Camden Local Plan Policy G1 sets out the strategic objectives and priorities of the Local Plan, including to meet the need of 16,800 additional homes.
- 7.16 Policy H1 of the Local Plan aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.
- 7.17 Policy H3 of the Local Plan aims to ensure that existing housing continues to meet the needs of existing and future households by resisting development that would involve a net loss of residential floorspace. Supporting text in paragraph 3.70 further notes that proposals that will be resisted include reductions in floorspace that are material because they reduce the number of residents who can occupy a home or property.

### **Assessment**

- 7.18 The NPPF, London Plan and Local Plan support development which boosts housing supply and more specifically, Policy H3 of the Local Plan resists the loss of existing homes and residential floorspace. The proposal will not result in a loss of residential floorspace and the property will continue to accommodate a two-bedroom four-person residential unit. As such, the proposal will continue to contribute to supplying a sufficient number of homes to meet present and future generations' needs whilst protecting and enhancing the built and historic environment. More specifically, the proposal will continue to supply the much needed housing in Camden, as indicated in the draft London Plan which has increased Camden's housing target to 1,086 units per annum from the current housing target of 899 units per annum.
- 7.19 In light of the above, the principle of residential use at the site is supported by national, regional and local policies. The Council has also considered the principle of residential use as acceptable at pre-application stage.

### **Residential quality**

#### ***Policy context***

- 7.20 London Plan policy 3.5 seeks to encourage housing developments to be of the "*highest quality internally, externally and in relation to their context and wider environment.*" The policy continues to note that "*the design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of public, communal and open spaces, taking particular account of the needs of children and older people.*"
- 7.21 Under London Plan Policy 3.5, the Nationally Described Space Standards set out the minimum space requirements for new housing.

- 7.22 London Plan Policy 3.5 expects residential development proposals to make provision of the Mayor's Housing SPG (2016).
- 7.23 The SPG sets out a series of dwelling space standards. Standard 26 notes that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant.
- 7.24 Standard 29 of the SPG states that developments should minimise the number of single aspect dwellings to ensure residential units receive adequate daylight and offer a choice of views.
- 7.25 Draft London Policy D4 reiterates that residential developments should be of high-quality design. Similar to the adopted London Plan, the draft Policy sets out minimum space standards, private outdoor space minimum standards and the requirement to maximise dual aspect dwellings.
- 7.26 The requirement to meet the Nationally Described Space Standards and achieve good dual aspect are reiterated in Policy H6 of Camden Local Plan and Section 4 of LB Camden Planning Guidance (Interim Housing). The LB Camden Planning Guidance further notes that proposed housing should be high quality, taking into account provision of natural light, outlook, privacy and outdoor space.

### **Assessment**

- 7.27 The proposed residential unit will be high quality. The two-bedroom unit (with 4 bed spaces) will have 161.9 sqm of floorspace, which exceeds London Plan minimum GIA requirement of 79 sqm.
- 7.28 In addition to the existing courtyard, a roof terrace is also proposed to provide an additional 9.5 sqm of private outdoor space, which exceeds the minimum standards set out in the Mayor's Housing SPG. The roof terrace has been appropriately designed to provide adequate outlook and privacy whilst ensuring the neighbouring residential amenity is not impacted. As such, the proposed residential unit will be of high quality. Further details on amenity impacts are provided in the *Amenity impacts on neighbouring residents* section below.
- 7.29 The proposed unit will achieve multiple aspect. The proposed full-width windows on the front elevation, the enlarged windows on the side elevation, new windows on the rear elevation and the proposed rooflights will further maximise the provision of daylight/sunlight. As such, the future residents will enjoy high levels of natural light. Further information on the provision of daylight/sunlight is contained within the accompanying Design and Access Statement.
- 7.30 In light of the above, the proposed residential unit will provide a high standard of accommodation, in line with the requirements set out in the London Plan, Housing SPG, draft London Plan and Camden Local Plan.

### **Design and heritage considerations**

#### ***Policy context***

- 7.31 NPPF Paragraph 124 sets out that good design is a key aspect of sustainable development and is indivisible from good planning. Paragraph 127 requires proposals to function well and add to the overall quality of the area over the lifetime of the development; to establish a strong sense of place; and be sympathetic to local character and history without preventing appropriate innovation or change (such as increased densities).
- 7.32 Paragraph 130 states that permissions should be refused for development of poor design that fails to take opportunities available for improving the character and quality of an area and the way it functions.
- 7.33 In determining applications, paragraph 192 of the NPPF encourages local authorities to take account of a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 7.34 Good design is central to all objectives of the London Plan. London Plan Policy 3.5 requires the design of housing developments to be of the highest quality internally, externally and in relation to their context and to the wider environment.
- 7.35 London Plan Policy 7.4 expects development to provide a high-quality design that responds in a positive manner to the existing context, where possible enhancing it. Whilst London Plan Policy 7.6 seeks to ensure that buildings and structures are of the highest architectural quality appropriate to its context. These requirements are echoed in draft London Plan Policy D1.
- 7.36 Policy 7.8 of the London Plan states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- 7.37 Draft London Plan Policy HC1 notes that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 7.38 The Mayor's Housing SPG advises that, through scale, material, massing and building type, development should take account of the existing character and urban grain of a place and build on its positive elements (paragraph 2.2.3).
- 7.39 Policy D1 of the Camden Local Plan seeks to secure high quality design in development and requires development to respect local context and character; preserves or enhances the historic environment and heritage assets; comprises details and materials that are of high quality and complement the local character; and integrates well with the surrounding streets and open spaces. This is reiterated in Section 2 and 3 of the Camden Planning Guidance (Design).
- 7.40 Policy D2 of the Camden Local Plan outlines that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings.



- 7.41 The Bloomsbury Conservation Area Appraisal and Management Strategy (BCAAMS) notes that there are several small mews streets in the sub area of 'Queen Square/Red Lion Square' where the site falls within. It also notes that brick is the predominant material used in the Conservation Area.

### ***Assessment***

- 7.42 The proposed development will be of high-quality design that responds positively to the local area and its historic context, including Bloomsbury Conservation Area and the Grade II listed building at 50 Red Lion Street. Detailed design justification in relation to heritage considerations are contained within the accompanying Heritage Statement by Icen Projects.

### *Height, scale and massing*

- 7.43 The proposal will maintain the height of the existing building of three storeys, with the exception of a small roof extension within the nook of Omnium Court. As recommended by the Council in the previous pre-application consultation (Appendix 2), the existing front and rear roof slopes will be raised to create a full storey on the second floor level. This will provide additional living accommodation whilst minimising the scale and massing of the proposal to ensure it is appropriate to its local context. The proposal will therefore maintain its subordinate nature to the listed building at 50 Red Lion Street and surrounding terraced buildings, and ensure that it does not interrupt the existing legibility of the group of mews style buildings.

- 7.44 The proposed roof extension will be positioned within the nook of Omnium Court. Given the small scale of this extension and that it will be hardly visible, there will be limited visual impacts on the local area and the historic context of the site. The proposed extension is therefore considered to be acceptable. A roof extension has also been allowed in the previous planning permission (PS9804997/), which further indicates a roof extension at this location would be appropriate and acceptable.

### *Appearance and building form*

- 7.45 The proposal will retain the appearance and character of the existing building as much as possible. In particular, it will maintain the existing mews-style appearance of the building, which has been identified as a historic interest by the Council at the pre-application stage. The proposed front façade has been carefully designed to reflect this as it will incorporate a triple-width opening and full-width windows, which take cues from the existing front façade. The existing external stairs and chimney will also be rebuilt whilst the rear elevation is largely retained, which further preserves the historic interests of the existing building. The proposed development will therefore be of high-quality design.

- 7.46 New windows and doors will be provided on the rear and side elevations. These have been carefully designed to ensure they respect and enhance the character and appearance of the conservation area and the existing building. Insertion of windows on the rear elevation has been considered acceptable in the previous planning permission (ref. PS9804997/).

### *Materiality*

- 7.47 The proposed new facades will be made of reclaimed brick and the existing bricks will be retained on the rear façade. All proposed windows, glazing and doors will be timber framed. The BCAAMS states that brick is the predominant building material used across the Conservation Area and timber doors and windows can be found on mews type properties to the rear of terraced townhouses. The proposal will therefore respect and preserve the appearance and character of the conservation area.
- 7.48 In consideration of the above, the proposed scheme will be of high-quality design that is appropriate to the local and historic context. It will preserve and enhance the character and appearance of the Bloomsbury Conservation Area as well as the setting of the listed building at 50 Red Lion Street. This is in line with the planning policy requirements and guidance set out in the NPPF, London Plan, draft London Plan, Camden Local Plan and the BCAAMS.
- 7.49 Further design and heritage justification are contained within the accompanying Design and Access Statement by David Kohn Architects Ltd, Heritage Statement by Icen Projects and Archaeological Desk Based Assessment by CgmS Heritage.

### **Amenity impacts on neighbouring residents including daylight/sunlight**

#### ***Policy context***

- 7.50 Paragraph 127 of the NPPF states that planning decisions should ensure developments create places that are of a high standard of amenity for existing and future users.
- 7.51 London Plan Policy 7.6 requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential building.
- 7.52 The Mayor's Housing SPG (2016) indicates that BRE good practice guidelines and methodology can be used to assess the levels of impact on residential amenity of adjoining owner/occupiers in terms of loss of daylight/sunlight.
- 7.53 Policy A1 of the Camden Local Plan seeks to protect the quality of life of occupiers and neighbours. The policy sets out factors that the Council will consider including visual privacy outlook; and sunlight, daylight and overshadowing.
- 7.54 LB Camden Planning Guidance (Amenity) further notes that proposals should ensure a high standard of amenity. Section 2 of the guidance relates to overlooking, privacy and outlook. It outlines that it is good practice to provide a minimum distance of 18m between the windows of habitable rooms in existing properties direction facing the proposed development, assuming a level topography.

#### ***Assessment***

- 7.55 The proposed scheme will not result in unacceptable harm to the amenity of neighbouring residents.
- 7.56 The Council considered the bulk and massing of the previous proposal presented at the pre-application 2 consultation to be acceptable in terms of daylight and sunlight for neighbours. This was due to the location of the additional floor (within the nook of Omnium

Court) in relation to neighbours' windows. The location of the proposed additional floor remains the same. Therefore, the proposal is not considered to cause any adverse daylight/sunlight impacts. The previously proposed a double barrel vaulted roof has been removed, which further minimises any visual and daylight/sunlight impacts. Further information is contained within the accompanying Design and Access Statement.

7.57 Screening is provided on the external staircase with the use of timber framed glazing with privacy glass. This ensures the proposal will not result in any overlooking impacts for neighbours and future residents.

7.58 The proposed roof terrace has been carefully designed to ensure that it will not cause overlooking impacts on neighbours. As opposed to the proposals at pre-application stage, the roof terrace has been set back significant to only front the nook of Omnium Court. As such, there will not be any windows directly facing the roof terrace and there will be an adequate separation distance between the roof terrace and the habitable windows at 50 and 51 Red Lion Street. This will minimise any overlooking impacts. In addition, the immediately adjacent neighbouring windows at Omnium Court have privacy glass already installed or are serving communal stairs, therefore there will not be any overlooking impacts in this respect.

### **Transport and access**

#### ***Policy context***

7.59 Paragraph 102 of the NPPF highlights that transport issues should be considered from the earliest stages of development proposals. It also sets out transport objectives, this includes the promotion of walking, cycling and public transport use. Paragraph 103 states that the planning system should actively manage patterns of growth in support of the objectives set out in paragraph 102.

7.60 London Plan Policy 6.1 seeks the integration of transport and development by encouraging development which reduces the need to travel; seeking to improve the capacity and accessibility of public transport, walking, and cycling; and supporting development which generates high trip levels at locations with high public transport accessibility.

7.61 London Plan Policy 6.3 sets out the criteria used for assessing the effects of development on transport capacity and requires development to not adversely affect safety on the transport network.

7.62 The ambition to reduce Londoners' dependency on cars by increasing walking, cycling and public transport use is echoed in draft London Plan Policy T1.

7.63 London Plan Policy 6.9 and draft London Plan Policy T5 relates to cycling, and requires developments to provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out at Table 6.3 and 10.2 of the Plan respectively. The current London Plan standards are summarised below at Table 8.5.

Land use	Long-stay	Short-stay
----------	-----------	------------

C3-C4	dwellings (all)	1 space per studio and 1-bedroom unit  2 spaces per all other dwellings	1 space per 40 units
-------	-----------------	-------------------------------------------------------------------------------	----------------------

*Table 8.5 Current London Plan minimum cycle parking standards*

7.64 Policy T1 of the Camden Local Plan seeks to promote sustainable transport by prioritising walking, cycling and public transport in the borough. It further notes that development proposals must provide for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3).

7.65 The supporting text for Policy T2 of the Camden Local Plan states that in redevelopment schemes, the Council will consider retaining or re-providing existing parking provision where it can be demonstrated that the existing occupiers are to return to the address when the development is completed.

### **Assessment**

7.66 The front courtyard is currently used for car parking. In accordance with the supporting text for Policy T2 of the Local Plan, the existing occupiers will be returning to the address following the completion of the redevelopment and will continue to use this area for parking. The existing parking space will be retained and is considered acceptable.

7.67 No.3 cycle parking spaces will be provided at the front courtyard, which exceeds London Plan minimum standards and is therefore in line with the Camden Local Plan. The proposed cycle parking will be secure, safe and easily accessible for future residents.

### **Sustainability**

#### **Policy Context**

7.1 Paragraph 148 of the NPPF states that the planning system should support the transition to a low carbon future in a changing climate. Paragraph 158 further notes that new development should help to reduce greenhouse gas emissions.

7.2 The aim to achieve an overall reduction in London's carbon dioxide emissions is outlined in London Plan Policy 5.1. The Mayor seeks to reduce emissions by 60 per cent by 2025.

7.3 Policy CC1 of Camden Local Plan requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. It seeks to promote zero carbon development and require all development to reduce carbon dioxide emissions.

### **Assessment**

7.4 Currently, the existing building is dated, and the proposed redevelopment will significantly improve the sustainability and energy efficiency of the building. This includes the

replacement of all existing single glazed windows and doors with double glazed replacements, and the installation of additional wall insulation and damp-proofing.

- 7.5 To minimise the effects of climate change, optimise resource efficiency and to reduce waste, the level of demolition has been minimised to only where it is necessary for structural improvements. As such, the existing buildings will be retained as much as possible, including the rear elevation.
- 7.6 Renewal energy options were explored during the second pre-application process, however it was concluded that this would be difficult to implement and would not be suitable given the physical constraints of the site.
- 7.7 In consideration of the above, the proposed development will therefore achieve the highest feasible environmental standards, in compliance with the NPPF, London Plan and Policy CC1 of the Local Plan.

### **Refuse and recycling**

#### ***Policy Context***

- 7.8 Policy 5.17 of the London Plan requires suitable waste and recycling storage facilities in all new developments.

Policy CC5 of Camden Local Plan seeks to make Camden a low waste borough and requires developments to include facilities for the storage and collection of waste and recycling.

#### ***Assessment***

- 7.9 A waste and recycling storage facility will be provided at the front courtyard for future occupants. These will be accessible and convenient for storage and collection.

## 8 CONCLUSIONS

---

- 8.1 The proposed part demolition part redevelopment scheme at 50c Red Lion Street will be high quality and will re-provide a two-bedroom residential unit with ancillary artist's studio/gallery. The proposal will enhance the existing living accommodation through the provision of additional residential floorspace and the improvement of the existing structural condition.
- 8.2 The development will be of high-quality design that will protect and positively contribute to the character and appearance of the heritage assets in the area, including the Bloomsbury Conservation Area and the Grade II listed building at 50 Red Lion Street. The proposal has also taken careful considerations to preserve and enhance the historic interests of the existing building as identified at pre-application stage.
- 8.3 The residential unit will provide a high standard of accommodation for future residents and will respect the neighbouring amenity and local context. Sufficient vehicle and cycle parking spaces will be provided to accommodate the needs of future residents.
- 8.4 The proposal will minimise the effects of climate change by improving the sustainability and energy efficiency of the existing building. The proposed development also seeks to optimise resource efficiency and to reduce waste.
- 8.5 This statement has demonstrated how the proposal comprises sustainable development. It is therefore considered to be an acceptable development proposal and should be determined favourably.

**Appendix 1 – Pre-application 1 feedback letter dated 11/09/2017**

Date: 11/09/2017

Our ref: 2017/3846/PRE

Contact: Rachel English  
Direct line: 020 7974 1343  
Email: [Rachel.english@camden.gov.uk](mailto:Rachel.english@camden.gov.uk)

Email: [jennifer.dyne@davidkohn.co.uk](mailto:jennifer.dyne@davidkohn.co.uk)

Dear Jennifer,

### **Town and Country Planning Act 1990 (as amended)**

Re: Wheatsheaf Yard, 50C Red Lion Street, London WC1R 4PF

Reference: 2017/3846/PRE

Thank you for your pre-application enquiry received on 3<sup>rd</sup> July 2017, together with a Pre-planning Report. A site visit was carried out on 9<sup>th</sup> August 2017.

The enquiry is regarding the demolition of the existing two-storey building (plus partial upper level) with residential and artist's space and erection of a new three-storey house with the excavation of a basement underneath and roof terrace at third floor level. The scheme would be residential with an interlinked artist's scheme on the lower floors.

This letter represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

### **Overview of the Site**

The site contains a part two part three storey terraced building located at the end of an alleyway off the western side of Red Lion Street. To the rear of the building is Lamb's Conduit Passage. The rear of the building is visible from the public realm on Lamb's Conduit Passage.

The site is used as an artist's studio on the ground floor with interlinked residential use above.

The site is located in an Archaeological Priority Area.

The building is not listed but it lies within the Bloomsbury Conservation Area. The building is not listed as making a positive contribution to the Conservation Area.



## **Planning history**

Planning permission was granted on 09/11/1999 for the erection of a roof extension and the insertion of windows in the rear wall in connection with the existing use of the building as a mixed use design studio with residential accommodation (ref PS9804997). From your pre-application submission, I understand that this permission was not implemented.

## **Policy context**

The relevant policies that would apply to this proposal are taken from the London Borough of Camden Local Plan. This was adopted on 3<sup>rd</sup> July 2017 and supersedes the Council's previously adopted Core Strategy and Development Policy documents (adopted on 8th November 2010). The London Plan 2016 and the NPPF (2012) are also relevant to the scheme. The following policies from Camden Local Plan will be taken into consideration:

The following policies from the Local Plan are relevant:

- G1 – Delivery and location of growth
- H1 – Maximising housing supply
- H3 – Protecting existing homes
- H6 – Housing choice and mix
- H7 – Large and small homes
- A1 – Managing the impact of development
- A3 – Protection, enhancement and management of biodiversity
- A4 – Noise and vibration
- A5 – Basements
- D1 – Design
- D2 – Heritage
- CC1 – Climate change mitigation
- CC2 – Adapting to climate change
- CC3 – Water and flooding
- CC4 – Air quality
- CC5 – Waste
- DM1 – Delivery and monitoring
- T1 – Prioritising walking, cycling and public transport
- T2 – Car-free development and limiting the availability of parking.

The following Camden Planning Guidance (CPG) documents also provide relevant guidance for this proposal:

- CPG1 – Design (2015);
- CPG2 – Housing (2015);
- CPG3 – Sustainability (2015);
- CPG4 – Basements and lightwells (2015);
- CPG5 – Town Centres, Retail and Employment (2013)
- CPG6 – Amenity (2013);
- CPG7 – Transport (2013)
- CPG8 – Planning Obligations (2015)

Bloomsbury Conservation Area Appraisal and Management Strategy 2011

## Planning Considerations

The following material considerations should be taken into account:

- Principle of land use
- Affordable housing
- Principle of demolition
- Design
- Housing mix
- Standard of residential accommodation
- Amenity and impact on neighbouring properties
- Basement impact
- Transport including Construction Management Plan and Highways
- Sustainability and Energy
- CIL
- S106 obligations

### Principle of land use

The principle of replacing the existing live/work unit with a new building is acceptable in terms of housing policies H1 and H3 of the Camden Local Plan 2017. A planning statement would need to be submitted with any planning application which discusses the existing and proposed uses.

### Affordable housing

Policy H4 (affordable housing contribution) would only be triggered if more than 100sqm of residential floorspace is added.

### Principle of demolition

The existing building has distinctive qualities with its Victorian mews design, notably its brickwork to the rear and unique front façade appearance. Whilst the building is not noted in the Conservation Area Appraisal as making a positive contribution to the Conservation Area, the demolition of the building would need to be fully justified. You have indicated that the building is in a poor condition however a full structural survey would need to be submitted stating that the building cannot be renovated. I would strongly suggest that you consider the retention of the front and rear facades in your design process.

In order to justify the demolition of the building I would recommend that you thoroughly research the history of the building in line with paragraph 128 of the NPPF. This should include an assessment of the building's local significance (age, design, architect, contribution to local character etc.) taking into consideration how this significance could be integrated into your proposals for the site.

Due to the above considerations, I cannot at present say whether the demolition of the existing building would be accepted at application stage.

### Design

The Council seeks to secure high quality design in development as set out in policy D1 (Design). As the principal of the demolition of the building has not been agreed and full detailed drawings have not been submitted, my comments on the design of the proposed building are therefore limited.

The proposed house would be built on the same footprint as the existing house with the addition of a newly excavated basement and one and a half additional storeys additional height. The full additional storey would be just below the height of the adjoining warehouse building to the north. I would suggest that the half width extension on top of the additional storey would be unlikely to be considered acceptable at application stage and the building should terminate with the full second storey. This is to maintain the varied arrangement of building heights between the application site and the building to the north.

The site lies within an Archaeology Priority area, thus an assessment will need to be submitted with any application to identify if the site has a potential for archaeological remains underneath.

### Housing Mix

Policy H6 of Camden Local Plan 2017 seeks to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table (DSPT). The DSPT indicates that 3-bed dwellings have high priority. As such the proposed provision of a 3-bed residential unit would be an appropriate housing mix.

### Standard of accommodation

The replacement dwelling would exceed the Government's technical housing standards in terms of size and it would provide a good standard of residential accommodation in terms of layout; space and room sizes.

### Amenity impact

Camden Planning Guidance 1 (Design) and policy A1 of the Camden Plan advises that developments should not cause a loss of amenity to adjacent properties with regard to sunlight, daylight, outlook, overshadowing, light pollution/spillage, privacy/overlooking, or a sense of enclosure.

The proposal would need to be sensitive to the existing neighbouring residential units. There are concerns that the additional storey would cause a loss of light and/or outlook to the residential occupiers at the rear of 18 Princeton Street or Omnium Court and occupiers to the rear of 50 Red Lion Street. At application stage I would suggest that you submit a Daylight and Sunlight Report clearly demonstrating the impact on the habitable rooms of neighbouring properties in accordance with Camden Planning Guidance 6 (Amenity).

The large proposed roof terrace is of concern as it could have significant overlooking impacts. You are advised that the Council will normally seek a minimum distance of 18m between the terrace and windows of habitable rooms of neighbouring occupiers. This is set out in chapter 7 of Camden Planning Guidance 6. Detailed drawings and sections would need to be submitted to fully assess whether a roof terrace would be acceptable.

## Basement Impact

There is no objection in principle to the excavation of a single storey basement however it would need to comply with policy A5 and guidance held within Camden Planning Guidance 4. The proposed basement should be set away from neighbouring party walls. A Basement Impact Assessment should be submitted application stage in accordance with the provisions of policy A5 and Camden Planning Guidance (CPG4). These analyse the impact the proposed development would have structurally upon nearby premises, the land and the impact upon the water environment. The BIA should include all details of excavation, construction methods (and Burland category assessment) and mitigation methods to address the above should be detailed accordingly. A Sustainable Drainage System proposal should also be drawn up.

The site is identified in the Camden Geological, Hydrogeological and Hydrological Study as having ground water and slope stability constraints.

The new basement must not harm the stability of the neighbouring buildings or the function of local underground watercourses. Any application will need to be supported by a full Basement Impact Assessment that will be reviewed and independently verified by the Council's external engineering consultants. The applicant, in accordance with section 2.33-2.34 of the above guidance, would fund this.

It is considered that the new single storey basement proposed here may be considered acceptable but must comply with the requirements of Camden Local Plan policy A5. Points f to m of policy A5 states:

"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:

- f. not comprise of more than one storey;
- g. not be built under an existing basement;
- h. not exceed 50% of each garden within the property;
- i. be less than 1.5 times the footprint of the host building in area;
- j. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;
- k. not extend into or underneath the garden further than 50% of the depth of the garden;
- l. be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and
- m. avoid the loss of garden space or trees of townscape or amenity value".

The drawings submitted show that the proposed basement would not comply with point l. above and as a result the basement should be reduced in size.

The authors of the BIA must be in accordance with the qualifications required in Camden Planning Guidance 4 (page 15). As stated above, the BIA will need to be assessed at application stage by the Council's external consultants at the expense of the applicant. Depending on the outcome of the audit and sensitivities of the site, the excavation methodology may need to be subject to a Basement Construction Plan, secured by S106 legal agreement.

## Transport

### *Car parking*

The proposals do not wish to introduce any car parking facilities and are thus in keeping with policy T2 of the Camden Local Plan. In order to secure that the development remains car free in the future the new residential unit would be made car free by means of a Section 106 obligation in the event of a successful planning application.

### *Cycle Parking*

Policy T1 of the new Camden Local Plan requires development to provide cycle parking facilities in accordance with the minimum requirements of the London Plan and the design requirements outlined in CPG7. The development is required to provide 2 long stay cycle parking spaces.

Details of the cycle parking facilities would need to comply with the guidance provided within CPG7 (Transport). CPG7 is available on the Council's website at the hyperlink below:

- <http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance.en>

### *Managing the impacts of construction on the surrounding highway network*

Policies A1 and T4 state that Construction Management Plans should be secured to demonstrate how a development will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). The policies also relate to how development is connected to the highway network. For some developments, this may require control over how the development is implemented (including demolition and construction) through a Construction Management Plan (CMP).

While the development is not considered to be a large scale development, due to the sensitive location of the site, a CMP must be secured as a Section 106 planning obligation if planning permission is granted. A CMP (in the councils pro-forma) would need to be submitted once a Principal Contractor has been appointed, and would need to be approved by the Council prior to any works commencing on site.

A CMP Implementation Support Contribution of £1,140 would also need to be secured as a Section 106 planning obligation if planning permission is granted. The pro forma and an advice note providing further information on this financial contribution is available on the below.

- <https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/construction-management-plans.en>

### *Highway and Public Realm Improvements directly adjacent to the site*

Paragraph 6.11 of the new Camden Local Plan states that the Council will repair any construction damage to transport infrastructure or landscaping and reinstate all affected

transport network links, road and footway surfaces. The footway and carriageway directly adjacent to the site could be damaged as a direct result of the proposed works. We would therefore need to secure a financial contribution for highway works as a section 106 planning obligation if planning permission is granted. This would allow the proposal to comply with Policy A1 of the Local Plan. A cost estimate for highway works will be requested from our Design Engineering Team if planning permission is granted, and will be forwarded once received.

### Sustainability

In line with policies CC1, CC2 and CC3 of the Camden Local Plan 2017, all developments in Camden are required to make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage

The Council's Sustainability Plan 'Green Action for Change' commits the Council to seek low and where possible zero carbon buildings. The proposals will be expected to be designed to minimise energy use and CO2 emissions in operation through the application of the energy hierarchy. All new residential development will also be required to demonstrate a 35% CO2 reduction below Part L 2013 Building Regulations (in addition to any requirements for renewable energy). For more details, see section 8 of the Camden Local Plan 2017.

Policy CC2 of the Camden Local Plan seeks to ensure that development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation and encourage new build residential development to use the Home Quality Mark and Passivhaus design standards. These measures should be detailed in the Design and Access Statement or in a separate Sustainability Statement.

### CIL

If the final scheme adds more than 100sqm of floorspace then it will be liable for the Community Infrastructure Levies for both the Mayor of London and the London Borough of Camden. The Mayor's CIL will apply to all development that adds one or more dwellings or more than 100sqm of floorspace at a rate of £50 per sqm. The Council's CIL will equally apply at a rate of £500 per sqm in the Zone A (South Camden) area. Please refer to the Council's [website](#) for further information on the Borough's CIL.

### S106

The following Section 106 planning obligations would be required if planning permission is granted:

- Car free development;
- Financial contribution for Highways works;
- Construction Management Plan (CMP) and a one off financial contribution of £1,140 to cover the costs of reviewing the CMP.

### **Conclusion and next steps**

The key issue for this proposal is whether the demolition of the existing building would be acceptable. As discussed above, a full justification for the demolition would need to be submitted. In terms of the proposed building, I consider that the height would need to be reduced as explained in paragraphs above. Detailed elevations have not been submitted so no comments are offered in this respect.

Residential amenity issues also require further information, including a full Daylight and Sunlight Report. The upper floor terrace is concerning given its size, location and relationship with surrounding properties. Revisions and evidence to support the level of overlooking introduced would be required as part of any formal planning submission.

As such I would advise that you submit a pre-application follow-up enquiry with design options for our consideration and further information regarding the history of the building.

### **Planning application information**

If you submit a planning application, I would advise you to submit the following for a valid application:

- Completed forms.
- The appropriate fee
- An OS based location plan at 1:1250 scale denoting the application site in red and other land in applicants' ownership in blue.
- Existing and proposed floor plans, elevations, sections at a scale of 1:50
- Planning statement including details of the existing and proposed uses
- Design and Access Statement
- Structural Statement
- Archaeological Assessment
- Energy/sustainability statements
- Basement Impact Assessment
- Daylight/sunlight report

Please see our [website](#) for more information regarding validation requirements.

### **After you submit your application**

It would be useful if you could let me know when you have submitted the application along with the planning portal reference number. I will then pick the application up as the case officer.

You are strongly advised to discuss your proposals with neighbouring buildings prior to submitting any applications. We are legally required to consult on planning applications with individuals who may be affected by the proposals. We no longer notify neighbours by post, but we still display a notice on or near the site and advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

It is important to us to find out what our customers think about the service we provide. To help, we would be very grateful if you could take a few moments to complete our [pre application enquiry survey](#). We will use the information you give us to monitor and improve our services.

If you have any queries about the advice contained in this letter please contact me on **020 7974 1343**.

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

Yours sincerely,

Rachel English  
Senior Planning Officer



**Appendix 2 – Pre-application 2 feedback letter dated 13/04/2018**

**Date:** 13 April 2018  
**Our Ref:** 2018/0301/PRE  
**Contact:** Tessa Craig

**Direct Line:** 020 7974 6750

**Email:** [Tessa.Craig@camden.gov.uk](mailto:Tessa.Craig@camden.gov.uk)

**Regeneration and Planning  
Culture and Environment**  
London Borough of Camden  
5 Pancras Square  
London N1C 4AG

Tel 020 7974 4444  
Fax 020 7974 1975  
[planning@camden.gov.uk](mailto:planning@camden.gov.uk)  
[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

218 Wheatsheaf Yard  
50C Red Lion Street  
London  
WC1R 4PF

Dear Ms Dyne,

**RE. PLANNING PRE-APPLICATION ADVICE 2018/0301/PRE  
218 WHEATSHEAF YARD, 50C RED LION STREET, LONDON, WC1R 4PF**

**Erection of new build house, with ancillary artist's studio/gallery and basement,  
following demolition of existing building.**

I refer to our pre-application meeting held on 9<sup>th</sup> March 2018 about the above proposal, along with drawings 218/L01/01, 218/L02/01, 218/L02/02, 218/L02/03, 218/L02/04, 218/L05/01, 218/L05/02, 218/L12/01, 218/L12/02, 218/L12/03, 218/L12/04, 218/L12/05, 218/L12/06, 218/L15/01, 218/L15/02, 218/L14/01, 218/L14/02, 218/L14/03, 218/L14/04, 218/L14/05, 218/L14/06 and documents Structural Appraisal of Existing Building 1742.R02.P2, Advance Property Preservation Ltd Survey Report AD/11834/SW, Walter Winn Property Survey report, SGA Consulting Ltd 'Reducing Carbon Emissions for Wheatsheaf Yard' Revision P1 and 218 Wheatsheaf Yard Pre-Planning Application II January 2018.

Set out below is a detailed note of the principal issues discussed at the meeting.

*Principle of Demolition*

The application building is a modest former workshop/stables which is considered to make a positive contribution to the Bloomsbury Conservation Area, despite having been omitted from the Conservation Area statement, presumably due to its concealed frontage. Its rear elevation is prominent from the direction of Red Lion Square and of considerable age, showing at least three distinct build phases, although its exact date is currently unclear.

The application documents suggest a date of 1874, but elements of the interior, such as the construction of the roof trusses point towards the early-19<sup>th</sup> century. This suggests that it is approximately 200 years old, although lower parts may be older. The site's relationship with grade-II-listed no 50, a mid-18<sup>th</sup>-century terraced house, now with a 19<sup>th</sup>-century shop at ground level (in whose back garden the site adjoins), and its presence before 1947, also make it arguable that it is a curtilage-listed structure. It is considered the subject building definitely contributes to the setting of the listed building at no 50.

The facade presents a typical mews-style subordinate back land property in terms of its materials, design and scale, forming a legible group with the premises to either side of the alley, and with its other small workshop-type neighbours. The triple-width opening with bressumer above, surmounted by a full-width workshop window and derrick platform has considerable historic interest and charm. The yard also contributes positively, both to the conservation area and the setting of the listed building.

The previous pre-application advice advised demolition of the building would need to be fully justified, requesting a structural survey to demonstrate the building cannot be renovated and that the history of the building be researched. The structural report, while noting defects in the

facade, admits that they can be overcome with “significant strengthening works”. The rear elevation is described as being in relatively good condition. It is clear from the engineer’s report that the existing building is essentially repairable and that his concerns lie with increases in load caused by the addition of more storeys, and with stability problems caused by digging a basement. That is to say, the defects described to justify the building’s demolition are consequences of the proposal. As for the building’s history, as noted, parts of it appear to date from the early-19<sup>th</sup> century while no evidence to the contrary has been supplied.

Consequently, without consideration of the site’s potential curtilage listing status, demolition of the elevations will harm the character and appearance of the conservation area and the setting of the listed building and are unlikely to be supported.

#### Design and Height

The applicant proposes the demolition of the two-/three-storey structure and its replacement with a considerably more bulky three-/four-storey structure with roof terrace and basement. This is considered to represent overdevelopment of this back land site and to be harmful to the setting of the listed building.

As far as extending the property is concerned, as noted, it currently forms a subordinate back land structure to the listed building on Red Lion Street. While the roof has already been extended with a large dormer, the building has retained its original proportions and subordinacy to the surrounding houses. Consequently, an extension that would add additional height and bulk to the upper level would be resisted.

Furthermore, the structural survey suggests that further loading would cause the building to collapse. However, if the structural problems can be overcome, it is possible that the existing dormer structure could be widened, allowing enlargement of the existing mezzanines to form a full storey. The form of the existing roof means that although pitched at the front, it is flat to the rear, meaning that additional height on the rear elevation would be difficult to integrate, even if it were considered desirable. Being surrounded by a storey-height parapet, it is possible that the rear roof slope could be raised to flat, also allowing more accommodation on the second floor.

#### Amenity

Policy A1 (Managing the impact of development) of the Camden Local Plan seeks to ensure amenity of neighbours is protected. Among the factors to be considered are privacy, natural light and outlook. Policy A1 advises the Council will not grant permission for development that causes unacceptable harm to residential amenity.

The proposed bulk and massing is unlikely to cause concern in terms of daylight and sunlight for neighbours due to the location of the additional floor in relation to neighbours’ windows. It is not entirely clear how the proposed roof terrace and external stairs would relate to neighbours’ windows to the east and whether this would raise concern in terms of overlooking. More information would be required to understand whether overlooking may occur and whether any screening would be possible to overcome this.

The principle of demolition is not considered to be acceptable however, there may be scope for further extension to the existing property at roof level. The roof terraces proposed may cause overlooking and this would need to be explained at application stage.

This document represents the Council’s initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

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

Yours sincerely

Tessa Craig  
Planning Officer