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Planning and Regeneration
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Date: 08/06/2020
Our ref: 2020/1402/PRE
Contact: Sofie Fieldsend
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Dear Mr Ketelle

Re: 25 John Mews, WC1N 2NS

www.camden.gov.uk/planning

Thank you for submitting a pre-planning application enquiry for the above property which was received on 17/03/2020, with payment of £1,668.95 received on 31/3/2020. I write following our online meeting on the 23rd April 2020.

1. **Proposal**

The proposal includes:

- Extension of existing basement
- Installation of ventilation equipment
- Internal alterations

2. **Site description**

The site is a Grade II listed two storey end terrace property located within the Bloomsbury Conservation Area.

The application site is subject to a 'subterranean (groundwater) flow' and 'slope stability' underground development constraints according to the Council's registers.

3. **Relevant planning history**

2013/4804/P - Installation an air conditioning plant at roof level. – **Granted 07/10/2013**

2013/5542/L - Installation an air conditioning plant at roof level. – **Granted 07/10/2013**

2012/4925/P - Change of use from office at ground floor (Class B1) and flat on first floor (Class C3) to a single dwellinghouse (Class C3), including creation of roof terrace with privacy screen on flat roof, installation of 2 rooflights and external alterations to fenestration. – **Granted 26/03/2013**

2012/5150/L - Works associated with the change of use from office at ground floor and flat on first floor to a single dwellinghouse, including creation of roof terrace with privacy screen on flat roof, installation of 2 rooflights and external alterations to fenestration and associated internal alterations. – **Granted 26/03/2013**

PS9704239 - Variation of additional condition 2 concerning a personal user restriction on planning permission dated 21st February 1997 (Reg.no.PS9604154) to change the named user from "G.Thompson Ltd." to "Mach 1 Couriers". - **Granted 17/04/1997**

PS9604154 - Continued use of the ground floor as a courier head office and control centre without compliance with additional condition 01 on the planning permission (Reg.No.PL/9501107) - **granted on 15 December 1995. Granted 21/02/1997**

P9601088 & L9601089 - Creation of additional residential dwelling by the erection of a mansard roof extension. - **Refused 07/11/1996**

9501108 - Use of the first floor as courier head office and control centre. - **Refused 15/12/1995**

9501107 - Use of ground floor as courier head office and control Centre.- **Granted 15/12/1995**

4. Relevant policies and guidance

National Planning Policy Framework (2019)

The London Plan March 2016

Intend to publish London Plan 2019

Camden Local Plan (2017)

G1 - Delivery and location of growth
 A1 - Managing the impact of development
 A4 - Noise and vibration
 A5 - Basements
 D1 - Design
 D2 - Heritage
 CC1 - Climate change mitigation
 CC2 - Adapting to climate change
 T1 - Prioritising walking, cycling and public transport
 T2 - Parking and car-free development
 DM1 Delivery and monitoring

Camden Planning Guidance

CPG Altering and extending your home (March 2019)
 CPG Amenity (March 2018)
 CPG Basements (March 2018)
 CPG Design (March 2019)
 CPG Transport (March 2019)

Bloomsbury Conservation Area appraisal and management strategy (2011)

5. Assessment

The planning considerations relevant to the current proposal are:

- Design and Heritage
- Amenity impacts
- Transport;
- Sustainability and waste

Design and heritage

Policy background

The Council's design policies are aimed at achieving the highest standard of design in all developments. Policy D1 requires extensions to consider the character, setting, context and the form and scale of neighbouring buildings; the quality of materials to be used; and the character and proportions of the existing building. Policy D2 additionally states that the Council will only permit development within conservation areas that preserves or enhances the character and appearance of the area.

The guidance outlined in CPG Basement provides information on basement and lightwell issues, including planning and design considerations, Basement Impact Assessments (BIA) and impacts to neighbours from demolition and construction. During the meeting, it was highlighted to the applicant that a revised version of this document is currently out for consultation and is available to view on the Council's website.

Policy A5 of the Local Plan outlines that basement development should not cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems, or damage the character of areas or the natural environment.

Policy A5 states that 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".

Proposal:

At basement level, the site currently benefits from a part basement, thought to date from a period before listing when the site was a garage. The existing basement measures 15sqm and is accessed via an access hatch concealed in the floor of the ground floor corridor with ladder connecting the two levels. The existing basement is used as storage for the residential property (Class C3).

The development seeks to extend the basement to 108sqm (93sqm increase in floorspace) and level the floor to provide a head height of 2.8m (minus the service void). A full staircase would be installed, where the existing laundry room is, to provide new access from the ground floor level.

Basement

A Basement Impact Assessment would be required at application stage in accordance with the provisions of Policy A5 and CPG Basement. The BIA should include all details relating to excavation, construction methods (and Burland category assessment) and mitigation methods to address the above should be detailed accordingly. The BIA will need to be

assessed at application stage by the Council's external consultants at the expense of the applicant.

Camden's BIA pro-forma can be found at:

<https://www.camden.gov.uk/basement-developments?inheritRedirect=true>

While the design of the basement does comply with the guidance in CPG Basements and Policy A5 (subject to the BIA audit) there are heritage concerns regarding the listed structure that may require the footprint to be reduced in size with less intervention to the historic fabric of the building.

Heritage

CPG basements states in the case of listed buildings, applicants will be required to consider whether basement and underground development preserves the existing fabric, structural integrity, layout, interrelationships and hierarchy of spaces, and any features that are architecturally or historically important. Where the building is listed, new basement development or extensions to existing basement accommodation will require listed building consent, even if planning permission is not required. The acceptability of a basement extension to a listed building will be assessed on a case-by-case basis, taking into account the individual features of the building and its special interest.

From the historic evidence provided, it is considered that the site was built without an original basement. During the time the building was in use as a garage, it is unclear what exactly existed within the building. The position of the existing ramped hole is labelled as a "hoist" in one drawing. However car hoists go up, rather than down. The alternative in the form of a hole would be labelled an "inspection pit". The fact that the hole takes the form of a ramp may suggest that the ramp led to next door's basement at some point. However, none of this is intrinsic to the special interest of the building, and there is no presumption that the existing excavation constitutes a basement, or that a larger basement is acceptable in this instance.

Basements directly beneath listed buildings are generally discouraged in principle. This is because of the scope for immense loss of fabric in the ground floor (both of the ground floor itself and anything connected to it), the requirement for the introduction of very large quantities of modern materials into a heritage context and the high probability of accidental damage to the building above and those nearby.

Where basements are considered acceptable, they must not interfere with the spatial character of the host building, must not be able to be experienced from within the historic parts of the host building and must be understood not to form part of the original plan form. To this end, they need to be approached via pinch points and have no visible manifestations.

The applicant would need to demonstrate that the entire ground-floor structure would not need to be substantially altered. Conservation Officers have raised concerns that this would not be possible and the proposal is therefore unlikely to be acceptable.

The heritage statement argues that the soil below the building is of no architectural interest, but is silent about the total loss of the floor structure itself. A previous scheme, 2012/4925/P, allowed the floor to be raised to its current level so that services could be run "without breaking the existing slab" (p9, design and access statement). In the absence of any explanation as to why "breaking the existing slab" was undesirable, this suggests that the slab is of significance.

The structural report in the same document says: "The structure consists of loadbearing masonry walls with concrete ground and first floors. The first floor is believed to be an early example of a filler joist floor i.e. steel beams with unreinforced lightweight concrete infill. This form of construction was used for industrial floors and high end apartments from the 1880s until the 1920s." This suggests that the ground floor is also an early form of concrete construction and was therefore considered worthy of conservation in 2012.

To counter this view, the applicant has commissioned a report stating that filler joists would not have been used at ground level, as spanning was not necessary.

The report also states that the type of concrete used is unlikely to date from the original construction. However, from the 2012 scheme it seems that there are two slabs, one above the other, and it is not clear which is being discussed here; the report simply says that the floor is 190mm thick, which is presumably only one slab. More clarification would be required for further assessment.

An entirely new concrete floor was installed at some point after the 1960s, the report suggests that inspection pits may have been present, leading to the floor being reformed after garage use ceased. We remain unconvinced and you should provide further evidence to substantiate this.

The applicant states that there would be no alterations to the ground floor, despite the complete removal of the concrete base on which it stands. A report explaining underpinning has been provided. You would need to provide demonstrable commitment and ability to retain all fabric that is not specifically consented to be demolished.

The existing basement and ground floors are to be entirely demolished, which is likely to entail an unacceptable degree of loss of historic fabric. There are concerns that this would also result in the loss of all the ground-floor partitions at the same time. The filler-joist first-floor deck is made of a brittle, primitive material that is unlikely to respond well to any instability caused by the substantial excavations below. It is therefore considered that this method of complete demolition is unlikely to be supported in principle.

As far as can be ascertained without a site visit, the interior retains limited historic fittings and surfaces at ground floor level.

The drawings show the ground floor as unaltered, apart from a ventilation riser which is likely to be acceptable, depending on the exact nature of the fabric it disrupts. How the pipe passes from the ground floor to the first floor need to be explained as it appears to do so within the floor. The significance of the ground floor shall therefore not be considered, save to say that it is assumed that all partitions, wall finishes and other features will be retained in their existing condition.

New access to basement level is proposed via the creation of a new staircase. This appears to be concealed but a door at ground floor level, its installation with minimal intervention would be likely to be acceptable.

The first floor too remains unaltered, apart from the riser which is likely to be acceptable, depending on the exact nature of the fabric it disrupts.

At roof level the riser emerges. A document has been supplied showing photos of the roof, but all of them face away from the relevant area. If the relevant section of the roof can be

shown to be of low significance and to be completely concealed from view, the installation may be acceptable.

The first section drawing indicates a sloping floor, the significance of which may preclude its removal. The heritage statement says it was there by 1959 (the building was listed in 1999) and suggests that it relates to an early use as garage.

The heritage statement cites a basement at 27 John's Mews as a precedent. However, this is not a listed building. The alterations cited at 13 Northington Street took place in 1995 (before listing) and in any case related to an existing basement.

More detail are required in regards to the proposed ventilation equipment, if an application were to be submitted. Details of the make/model and additional plant if proposed (and noise report) will be required.

Impact on neighbouring amenity

Policies A1 and A4 seek to protect the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of residents. This includes factors such as privacy, outlook, implications to natural light, artificial light spill, as well as noise and vibration impacts caused from the construction phase of development.

The current proposal is restricted to the footprint of the building and no lightwells are proposed. Therefore the basement extension would not cause any loss of outlook, privacy or light to any adjoining occupiers.

Whilst noise from construction would cause some disturbance to neighbouring properties the hours of operation at the site would be restricted by environmental health legislation to 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays.

Amenity of future occupiers

The proposed plans show a home cinema, laundry room, w/c, study and gym. As no lightwells are proposed (they would not be supported on design/heritage grounds) the Council would not be able to support the creation of habitable rooms at this level as it would create a poor quality of amenity for future occupiers. It is noted that there would be no habitable rooms at basement level and in this instance the creation of additional floorspace would be acceptable subject to design/heritage issues being addressed.

Transport

To minimize the impact on the highway infrastructure and neighbouring community, a draft construction management plan (CMP) would need to be submitted in application stage, and a detailed CMP would need to be secured via a section 106 planning obligation in accordance with Policy A1 if planning permission is granted. A CMP implementation support contribution of £3,136 and a Construction Impact Bond of £7,500 would need to be secured as a Section 106 planning obligation if planning permission were to be approved in the future. The Council has a CMP pro-forma which must be used and would need to be approved by the Council prior to any works commencing on site.

The CMP pro-forma is available on the Camden website:

<https://www.camden.gov.uk/documents/20142/1269042/CMP+pro+forma+03-02-2020.docx>.

Details on Construction Impact Bonds is available on the Camden website:

<https://www.camden.gov.uk/documents/20142/1269042/Construction+Impact+Bonds+-+Guidance+-+05-02-2020.pdf/>.

The development would involve basement excavations close to the public highway. The Council has to ensure that the stability of the public highway adjacent to the site is not compromised by the proposed basement excavations. The applicant would be required to submit an 'Approval in Principle' (AIP) report to our Highways Structures & Bridges Team within Engineering Services as a pre-commencement planning obligation. This is a requirement of British Standard BD2/12. The AIP report would need to include structural details and calculations to demonstrate that the proposed development would not affect the stability of the public highway adjacent to the site. The AIP would also need to include an explanation of any mitigation measures which might be required. The AIP report and an associated assessment fee of £1,800 would need to be secured via a legal agreement if planning permission were to be granted.

The public highway in the general vicinity of the site is likely to sustain damage as a direct result of basement excavation activities. We would therefore need to secure a highways contribution via a legal agreement if planning permission were to be granted. This would allow the Council to repair any damage to the public highway in the general vicinity of the site on completion of the development. Highways would assess the amount of highways contribution required if a planning application were to be submitted.

To summarise highways officers would require the following obligations to be secured by a S106 legal agreement if the development was acceptable at application stage:

- Construction Management Plan and associated Implementation Support Contribution of £3,136
- Construction Impact Bond of £7,500
- Approval in Principle and associated costs of £1,800
- Highways contribution – to be determined at the time of the application

6. Planning application information

The following documents should be included with the submission of a full planning application:

- Completed application form
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and Access statement
- Heritage Statement
- The appropriate fee
- BIA
- BIA pro forma
- Structural stability report

- Please see the following link to supporting information for planning applications

<https://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application/supporting-documentation--requirements-/>

All pdfs submitted via the Portal should be labelled so it is clear what the drawing or document relates to e.g. 'existing front elevation'. We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by displaying a notice on or near the site and placing an advert in the local press. The Council must allow 21 days from the consultation start date for responses to be received. The applicant is encouraged to engage with the Bloomsbury CAAC and the residents of adjoining properties prior to any formal submission.

Non-major applications are typically determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

7. Conclusion

The proposed basement fills the entire floorplan of the upper parts. The Saville's e-mail of 15 May says "the basement has a smaller footprint than that provided at ground floor", but it is not possible to reconcile this with the drawings supplied. This risks disrupting the spatial character of the building, which, as noted, would not historically be expected to have a basement, especially not one as large as the principal floors. The basement floor to ceiling height should also respect the hierarchy of ceiling heights and be less than the ground floor.

A modest basement may be acceptable provided that the concerns about harm to fabric and spatial character can be overcome.

Overall Officers have concerns that a basement of this scale with the amount of intervention to the historic fabric would be difficult to support at application stage. It is advised that an alternative scheme should be explored that would preserve the special interest of the listed building. This should be less invasive and reduced in scale from that currently proposed. Any subsequent formal application should include a BIA completed by a qualified engineer.

In regards to the proposed ventilation equipment further detail would be required to make a formal assessment.

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

If you have any queries about the above letter or the attached document please do not hesitate to contact Sofie Fieldsend on 020 7974 4607.

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

Yours sincerely,

Sofie Fieldsend

Planning Officer
Planning Solutions Team