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Via Planning Portal only

13 July 2020

Dear sir/madam,

**FULL PLANNING APPLICATION - THE TOWN & COUNTRY PLANNING ACT 1990 &
LISTED BUILDING CONSENT APPLICATION – PLANNING (LISTED BUILDING & CONSERVATION AREAS)
ACT 1990**

**LOWERING OF THIRD FLOOR CEILING LEVEL AND ERECTION OF SINGLE STOREY DOUBLE PITCH
MANSARD ROOF EXTENSION WITH PLANT CONCEALED BEHIND MANSARD, ALTERATIONS TO FRONT
FAÇADE AND RAISING OF REAR EXTENSION**

64 LINCOLN'S INN FIELDS, LONDON, WC2A 3JX

Please accept this covering letter as an accompaniment to this full planning and listed building consent application for the above works.

The Site:

In terms of context the application site forms a part of Lincoln's Inn Fields, the largest public square in London, which forms a part of the southern boundary of the borough of Camden bordering the city of Westminster.

The application site is located within the Bloomsbury Conservation Area on the west side of Lincoln's Inn Fields, close to the junction with Remnant Street and Gate Street. The host structure is Grade II listed and comprises an early 19th century four storey stucco front building with basement. The building is characterised by a square-headed doorway with fanlight and double panelled doors, corbels at the sides of the entrance below a stone first floor balcony with iron balustrade, recessed sash windows with segmental arches at ground floor and ionic pilasters through the first and second floors carrying entablature with dentil cornicing.

The third-floor windows are unusually tall for the period of the property, accentuated further by the long rectangular stepping detail either side of the windows, making the elevation top heavy and out of proportion with the remainder of the facade. Internally, the unexpected floor to ceiling height of the third floor (at 3.3m, same as the second floor below) further supports this anomaly. Similarly, the

top of the façade is crudely terminated by a section of lead flashing which appears to have lost a traditional parapet detail.

The building, as a result of historical planning applications, comprises nine residential units, the basement units of which have only recently been sold. The vaults beneath the front hardstanding area are partially used to house bicycles and plant and storage.

The surroundings are largely characterised by mixed commercial and residential use. The Inns of Court of Lincoln's Inn and Gray's Inn have a unique character in the context of the area and London as a whole. This character is derived from the marked contrast and transition in scale and sense of enclosure experienced when moving through the interconnected spaces comprising landscaped squares, enclosed courtyards, and narrow passageways and lanes with a high volume of pedestrian activity. For over five hundred years the area has been a major centre for the legal profession and for the training of barristers.

Those activities as well as residential use are the two prevalent land uses in the immediate surroundings and thus contribute to the sense of place, highlighted by the large public square opposite.

Relevant planning history:

The site has been the subject of a detailed planning history.

In the mid-late 1970s several listed building consent and planning applications allowed for the removal and/or renovation of parts of the front and rear building facades as well as its internal rearrangement.

Full planning permission **(2013/7434/P)** was approved and listed building consent **(2013/7457/L)** granted on 23 January 2015 for the change of use of the building from offices (B1a) to residential use (C3) and the partial demolition, alteration and extension to create nine residential units. The applications were approved subject to conditions and a s106 legal agreement. The permissions have been fully implemented.

On 23 June 2015 full planning permission **(2015/1794/P)** and listed building consent **(2015/2284/L)** was refused for the erection of a single storey mansard roof extension to provide 1 no. 2 bedroom flat. The applications were subsequently dismissed at appeal under references **3129639** and **3129640**.

In contextualising the character of the terrace, the Inspector noted:

The other buildings along this side of Lincoln's Inn Fields, which front onto the large and attractive public gardens at the centre of the square, include a number of other listed buildings. Whilst these share a common front building line, they otherwise exhibit considerable variety in age, style and height, and whilst the design quality of the unlisted buildings is not consistent, the distinctive individuality of the buildings within the row is an important element of the conservation area's character and appearance.

On 06 October 2017, full planning permission (**2017/0870/P**) was refused for the change of use of part of the basement (Class C3 Use) to storage facility (Class B8 Use). The application was subsequently dismissed at appeal under appeal reference **3188630**. For clarity, it is noted that the application/appeal were refused/dismissed on grounds relating to the impact on residential amenity and not any associated impact on the fabric or setting of the listed building/character of the area. This is substantiated by the granting of listed building consent (**2017/1496/L**) for the works.

The proposed development:

Full planning permission and listed building consent is sought to raise the existing rear extension, to lower the third-floor ceiling level and for the erection of a single storey double pitch mansard roof extension along with alterations to the front façade, reinstating typical Georgian proportions. For full details on the development proposal please refer to the supporting Design & Access Statement and Heritage Statement.

Planning Policy:

National

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three specific strands – economic, environmental and social. The analysis of the proposed development will demonstrate that the scheme will accord with each of the three strands and the presumption in favour of sustainable development will therefore apply.

Local

For the purposes of this application, the adopted Development Plan for the London Borough of Camden comprises the London Plan (2016), the Local Plan (2017) and the Camden Planning Guidance Documents. Other relevant documents include the Hampstead Conservation Area Statement (2001).

Planning Analysis:

Principle of development:

Law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

The application site comprises a building in active residential use and no changes are proposed to the established use class. In such locations, there are no development plan or national planning policies that restrict the extension or alteration of residential buildings in principle, subject to the consideration of all other detailed matters, set out below.

Overall heritage impact:

Case law dictates that decision makers are required to give *great weight* to any harm to the significance of a heritage asset and how this should be applied is set out in section 16 of the NPPF. This refers to the historic environment and requires the decision maker to consider whether the proposal sustains and enhances the significance of the heritage asset, making a balanced judgement having regard to the scale of harm or loss and the significance of the heritage asset.

A Heritage Statement therefore supports the submission and considers the significance of the heritage assets.

It identifies that the property has undergone alteration during the 18, 19 and 20th centuries but evidence suggests that at its core it is a 17th century building that has partly been reconfigured and extended.

The proposal in this instance does is not necessarily an application to return the building to its 17th century composition. It is however an application that seeks to restore its original proportions and a roof room that better relates to those original proportions and character. In doing so, the proposed scheme would relate no. 64 better to its origins and would enhance the characteristics of highly graded nearby historic buildings at nos. 57-58, nos. 59-60, no. 65 and nos. 66-67.

In respect of the design considered in its own right, and the relationship between the proposed development and its surroundings, the effect will be entirely positive. The supporting Heritage Statement concludes that, in line with section 66(1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 special regard has been had to the significance of surrounding listed buildings and the Bloomsbury Conservation Area. Overall the proposals as a whole will cause no harm to the significance of the listed building which has now been assessed as being 17th century in origin and not 19th century as previously considered. Please refer to the Heritage Assessment that accompanies the application for full details. The proposal would result in no harm to the setting of nearby listed buildings or the significance of the Bloomsbury Conservation Area, as a result of the proposed development.

Housing land supply

In order to accommodate Camden's growing population, the Local Plan makes clear that the Council needs to make the best use of the borough's limited land and resources and promotes the most efficient use of land in the borough. The local plan highlights housing as the borough's priority land use which accords with the government's objective of significantly boosting the supply of housing, as set out in the NPPF.

Although the proposed development results in the uplift of only one residential unit of accommodation, this has been held, albeit modestly, to represent public benefit in the context of existing housing need and therefore weighs significantly in support of the application.

Effect on neighbouring amenity:

Policy A1 of the Local Plan seeks to ensure development protects neighbouring residential occupiers from the adverse impact of development. This is echoed in guidance contained within the NPPF and the London Plan. Further guidance is provided in CPG Amenity which sets specific standards of development.

The general form and scale of the upward extension would not extend beyond the plane of existing residential properties and would not therefore have an adverse impact by virtue of an overbearing impact or loss of light/outlook.

In order to ensure that residential amenity is not significantly impacted upon during construction a Draft Construction Management Plan (CMP) supports the application.

In light of the above the application proposals would not cause undue harm to the amenity of neighbouring residents, in accordance with the NPPF and Policy A1 of the Local Plan.

Quality of residential accommodation:

Policy A1 of the Local Plan seeks to ensure development provides accommodation of a suitable standard of living taking into account size of the unit, daylight, sunlight, outlook, privacy and noise and vibration and this is echoed in guidance contained within the NPPF and the London Plan. Further guidance is provided in CPG Amenity which sets specific standards of development.

The layout of the proposed development has been designed in accordance with London Plan standards, providing a gross internal floor area of 109 sqm, well in excess of the 70sqm requirement. Further, the floor to ceiling heights of both the amended third floor level and the proposed upward extension would be 2.6m and 2.4 m respectively, similarly in compliance with Technical Housing Standards.

The proposed residential unit is of a high quality and meets the required internal space, storage and room size standards. The main living space is located at the front of the building, benefiting from significant south facing aspects.

The relationship of built development has been carefully considered in the context of the topography and distances between buildings and the absence of clear relationships with sensitive windows that could suffer substantive reductions in outlook means that there are unlikely to be any detrimental effects on the levels of sunlight/daylight.

In light of the above, the quality of the residential accommodation is considered acceptable, in accordance with guidance and standards set out in the development plan and national planning policy guidance.

Highways impact:

Policies T1 and T2 of the Local Plan highlight the importance of prioritising walking and cycling as a sustainable mode of transport and indicate that car-free development across the borough is a key aim. Additionally, the CPG on Transport states that car-free development will be expected in the Central London Area, town centres and other areas with high public transport accessibility.

The site is extremely well located in the context of public transport and therefore has a PTAL (Public Transport Accessibility Level) Rating of 6b, the highest rating of public transport accessibility in London.

The application therefore proposes car free development, in accordance with the Local Plan expectation.

A dedicated area providing for the secure and covered parking of cycles linked to residential uses is available in the existing basement and this would be utilised for the purposes of the additional unit of accommodation.

Summary and conclusion:

This application seeks full planning permission and listed building consent to raise the existing rear extension, to lower the third-floor ceiling level and for the erection of a single storey double pitch mansard roof extension along with alterations to the front façade, reinstating typical Georgian proportions. The roof extension will accommodate a single two bed unit of self-contained residential accommodation.

The proposal will meet an identified demand for high quality residential accommodation and will maintain the lawful residential use of the property.

The proposed development would accord with the general principles of the National Planning Policy Framework. The site is located within an inherently sustainable location in close proximity to existing public transport services and is consistent with the objectives of the NPPF and the development plan. The site will contribute to the creation of a socially inclusive community, whilst also maintaining and enhancing its historic importance and quality. It is considered that the proposal would significantly improve the built environment in this location by reportioning the front façade following a detailed assessment of the site history.

Careful consideration has to be given to the nature of the site including its relationship to its immediate surroundings, and the amenities of neighbouring occupiers.

In summary, the proposed development fulfils the three dimensions of sustainable development as defined by the NPPF and therefore the presumption in favour of sustainable development applies.

This Planning Statement should be read alongside the other supporting documentation and drawings which have been submitted as part of the Full and listed building consent applications.

I trust the commentary above is clear but if you require any points of clarification or have any questions please do not hesitate to contact me.

Yours sincerely

Stuart Minty
Director
SM Planning