Camden Council

Planning & Regeneration

2nd Floor

5 Pancras Square

London

N1C 4AG

1st October 2020

Dear Sir/Madam,

**25 Old Gloucester Street, London, WC1N 3AF**

**Planning & Listed Building Application**

**PP-09038364**

On behalf of Nikanth Estates Limited, via the Planning Portal today I have submitted an application for planning permission and listed building consent for the:

*Partial demolition behind retained façade and roof of frontage building, retention and extension of basement, retention ground floor including rear hall and erection of new building comprising 4 storeys above basement to provide 3 residential units (Use Class C3) and Cultural Centre (Class D1).*

The application is supported by the following:

* Archaeological Desk Based Assessment
* Basement Impact Assessment
* Construction/Demolition Management Plan
* Daylight and Sunlight Report
* Demolition Drawings
* Design and Access Statement
* Energy Strategy
* Existing and Proposed Drawings
* Heritage Statement
* Noise Impact Assessment
* Office Supply and Demand
* Site Location Plan
* Sustainability Statement
* Transport Statement
* Travel Plan

**Planning History**

Planning permission (2011/6097/P) and listed building consent (2011/6431/L) were granted for the development of the site on 21/05/2013 for the following development:

*Erection of single storey extension at second floor level, including installation of external stair in front lightwell from ground floor to basement level with new gates, and installation of lift and housing to existing non-residential institution (Class D1).*

The above development related to an extension to the building, which would be occupied by the existing D1 use. In granting planning permission and listed building consent, the officer’s delegated report noted the following:

* The site was vacant at the time that the application was made.
* Single storey roof top extension was a later addition and as part of the listing process was identified as having no architectural interest.
* Proposed extension would be compatible with the distinctive steep pitched roof of the front building.
* Proposal would not cause any harm to the amenity of the surrounding area or buildings by reason of overlooking noise disturbance or loss of light.
* Proposals would not result in increased footfall at the site or interfere with the free-flow of traffic or local parking conditions in the locality.

A certificate of Lawful Development Certificate was issued by Camden Council on 13/07/2016 (reference 2016/2836/P) to confirm that the above permission had been implemented under Section 91 of the Planning Act.

In July 2017, an application for planning permission and listed building consent for the following proposal was submitted to the Council (reference 2017/3997/P):

*Erection of a ground and first floor rear extension and a 3 storey extension to create , first, second and third floor to provide 6 residential units (Use Class C3) following demolition of existing rear and side extensions and first floor. Refurbishment of existing D1 use on basement and ground floors and change of use from ancillary D1 uses to C3 use on upper floors. Construction of an extended basement area to the rear, construction of mezzanine level at first floor, new oriel windows, outdoor terrace and; Alterations to front and side elevations to include new front doors, replacement front and side windows and gate.*

Following discussions with officers, the application was withdrawn in October 2018 as a number of issues were identified including the following:

* Loss of D1 floorspace.
* Justification for demolition particularly the small hall at the rear.
* Scale of development.
* Design.

**Pre-Planning Application Advice**

In 2019, the applicant sought pre-application advice for:

*Demolition behind retained façade and roof of frontage building, retention of rear hall and erection of new building comprising 5 storeys above basement to provide 6 residential units (Use Class C3) and Cultural Centre (Class D1). Erection of side extension at ground floor level to create new entrance and alterations to front and side elevations including front doors, windows and basement lightwell railings.*

Following a site visit in August 2019 and a meeting in October, officers provided advice in relation to proposals which sought to address the issues raised in relation to the withdrawn application. The advice concluded:

*The building has been unoccupied for a number of years, and is currently in a poor state of repair, it is therefore encouraging to see that there are clear aspirations to bring the site back into use. However, this is a sensitive site, and any demolition would need to be fully justified on architectural and heritage grounds, and any replacement development needs to be informed by the site, it’s history, and surrounding context.*

*A thorough assessment of the existing site, with a significance plan, outlining key features and historic fabric, and how the space would have historically functioned needs to be conducted before any conclusions regarding demolition can reasonably be drawn. Similarly a thorough heritage assessment, significance assessment, an assessment of townscape, and a conservation area assessment are required to then progress the development, and guide any proposed designs.*

*It is encouraging to see during the meeting that there are ambitions to alter the design, to form a more sensitive development which would form the optimum viable use on this site, and it is* advised *that you work closely with the Council in order to achieve the best possible outcome of the development*.

The scheme was subsequently altered in order to retain the basement and ground floor as they were considered to have merit. In addition, the number of flats was reduced to 3 in order to improve the overall layout both visually and from a heritage perspective as well as the amenity of the flats. On this basis, further pre-application advice was sought.

Following a meeting in June 2020, officers provided formal advice in their letter dated the 1st July 2020. This concluded:

*It is clear some carefully considered and positive steps have been made to the proposal since the initial pre-app, and it is encouraging to see the scheme evolve in such a way. Whilst the principle of development is considered to be acceptable and the design has significantly evolved, some further alterations are required prior to support being lent to the scheme.*

In response, a number of relatively minor revisions have been made in accordance with this advice.

In conclusion, we consider the proposal responds positively to the issues raised by officers over the last 3 years.

**Planning Policy**

*Land Use Principle*

The pre-application advice from earlier this year states:

*Under the initial pre-app it was established that the maintenance or where possible increase in level of D1 floorspace would be encouraged by the Council in land use terms (subject to other policy requirements). As existing, the site has 821sq. m of D1 floorspace with a proposed level of 1,122sq. m. This is an increase on the previous design where 857sq. m (increase of just 36sq. m) was proposed. This is a result of the design of the space, namely removing mezzanine levels and atriums to form full floorplates, and the removal of basement and ground floor residential accommodation within the school building to form additional D1 floorspace. The increase is considered to be positive in land use terms subject to other policy requirements.*

*Given the increase in floorspace proposed since the previous pre-app, policy H2 of the Camden Local Plan would come into effect. Policy H2 requires proposals which increase the total GIA of a site within the Central London Area (or town centre) of more than 200sq. m to contribute towards the supply of housing. Where appropriate, the Council will negotiate up to 50% of all additional floorspace to be self-contained housing subject to points (a) to (e) of the policy.*

*The Design and Access Statement notes that the existing site has a GIA of 821sq. m, with a proposed GIA of 1,324sq. m, equating to an increase of 503sq. m. The proposal would provide 202sq. m of residential floorspace, representing 40% of the overall floorspace. Whilst this falls short of the 50% desired by policy H2, it is acknowledged that the level of residential floorspace has been reduced (in order to form better quality accommodation) in compliance with previously issued officer advice. It is also acknowledged that the proposal would result in a significant increase in desired D1 floorspace, and the restoration and reuse of the dilapidated listed building. Residential could not be reasonably accommodated elsewhere on this site without significant interventions to the listed building, and so, in this instance, the level of residential provision is considered to be acceptable.*

*It was previously explained that, given its physical restrictions, office floorspace could be more easily accommodated within the school building and this should be fully explored in place of residential. This pre-app submission has been supplemented with a report by Kinney Green (Property Consultants) assessing the site and its potential for office provision. It demonstrates that, whilst the building is of character and in a desirable location, the floorplate with small rooms over multiple levels, would not present an attractive offer to modern businesses who prefer large rooms over a single floorplate. Even smaller or co-working occupiers (whom this could attract) often require fully serviced offices, with larger ‘break out’ areas and associated facilities (which this site could not offer). It demonstrates that once renovated, the office is likely to make a loss (even at the more optimistic pricing strategy given) and so would not be able to help fund the restoration of the listed building. Upon review of the information, Officers are satisfied that it would be difficult to achieve an office offer in this instance.*

*The uplift and upgrading of D1 floorspace is encouraged by the Council, and residential units are considered acceptable in principle in land use terms (subject to addressing heritage and quality of accommodation concerns previously raised (see relevant sections of this report)).*

The figures have changed a little since the above advice was issued. In this respect, the proposed GIA is lower, 1,139m2 which represents an uplift of 310m2. The proposed residential floorspace is circa 200m2 including the communal areas, e.g. staircase. Based on Policy H2, the C3 requirement is 155m2 so we have in fact exceed this.

The proposal also complies with Policy H1 (maximising housing supply)

Policy C2 of the Local Plan states:

*The Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect new approaches to the delivery of services*.

The Policy includes a list of criteria which collectively support, amongst other things the protection, extension and refurbishment of community uses.

*Principle of Demolition & Design*

The pre-application advice states:

*The previous pre-app proposed the demolition of the main hall and essentially façade retention of the school building. It was established that the level of demolition could not be supported and that any demolition would require clear and convincing justification. It was noted that whilst it may indeed be that the demolition of some of the hall is acceptable in principle, it is worth noting that permission has not been previously granted for this loss, and the loss needs to be clearly and convincingly justified before progressing to form an appropriate replacement.*

*The level of demolition has reduced from the previous pre-application enquiry to include only the 1940s main hall extension. The submitted heritage assessment makes clear that this part of the building is of limited significance and it is considered that its loss can be justified, subject to an acceptable replacement scheme.*

*It is acknowledged that in compliance with previous officer advice, more internal walls to the school building have been retained. This is beneficial to the scheme and is supported. It would be of benefit however to see a plan showing the historic walls and which are modern partitions. Some of the modern partitions may benefit from removal as this could form a better quality of accommodation for the residential units without harming the historic fabric of the listed building.*

The submitted Heritage Assessment states:

*7.9 The principal element of significance of the listed building lies in its external appearance and also its historical interest and group value with the schooling and institutional buildings on Old Gloucester Street. These elements will be improved as part of the development, in keeping with Policy D2 of the Camden Local Plan (2017).*

*7.10 We have considered the wider townscape and Conservation Area effects of the proposed additional massing of the new build element. It is likely the extension will be seen from some vantage points in Queen’s Square and directly opposite the building from Old Gloucester Street. The existing building is a neutral part of the listed building and the caged structure on the top is a detracting feature. It is our view that the proposed replacement building will improve views towards the building and from experiences within the Conservation Area.*

*7.11 Overall we identify significant enhancements to the historic environment as a result of the proposals through the refurbishment and occupation of the listed building for appropriate and complementary uses, the replacement of an extension with a new extension of high quality design, and the return of a vacant building back to new uses which will improve how the building functions and appears in the CA.*

*7.12 It is our view that the proposals do not need to be considered under paragraph 196 of the NPPF. If the Council were to take a different view, the harm to the heritage assets must be less than substantial and would fall to be weighed in the planning balance under paragraph 196 against the wider benefits of the proposals which are set out in the Planning Statement submitted with this application.*

*7.13 It is our view that the designs have responded to officers’ comments made throughout the pre-application process and that the effects on the significance of heritage assets are reduced. The proposed development will restore 25 Old Gloucester Street and enhance the character of the conservation area.*

Policy D1 relates to design and D2 to heritage. The scheme has evolved with careful attention to the level of demolition, the need to protect heritage assets and achieve good design. We consider the proposal positively responds to these needs

In conclusion and taking account of the above , we consider the proposal complies with Policies D1 and D2 of the Local Plan.

*Affordable Housing*

Policy H4(g) of the Local Plan requires a financial contribution to the provision of affordable housing. The most recent pre-application advice states this would be £22,546.20 based on a GIA of 202m2 of C3 floorspace. The applicant agrees to such a contribution.

*Quality of Residential Accommodation*

The proposal includes 3 flats (3 x 1 bedroom) all of which are dual aspect with the main aspect east facing. Two of the flats exceed the overall space standards as well as room dimensions and storage requirements. The other flat which is on the 1st floor is 5.6m2 below the space standard (50m2). However, it utilises the available space in an efficient way whilst respecting the form and layout of the retained listed building. Having said this, in theory it would be possible to make this flat a studio in which case it would exceed the space standards (37m2). However, the existing layout of the listed building lends itself to creating a separate bedroom.

**Conclusion**

The proposal has evolved with significant input from the Council. This has resulted in a scheme that meets the needs of the applicant whilst ensuring this valuable heritage asset is protected.

Planning policy has been carefully assessed as the scheme has evolved resulting in a proposal that complies with the development plan.

Yours sincerely



**Mark Pender**

**PPM Planning Limited**