

Planning & Heritage Statement

20 FLAXMAN TERRACE, WC1H 9AT

Salaft Properties Limited



Refurbishment of the existing lower ground floor office space including; The replacement of the existing solid opaque glass blocks at lower ground floor level along the front elevation with powder coated metal windows, the replacement of the two existing lower ground floor side windows on the western elevation with powder coated metal windows, Insertion of new main entrance to the lower ground floor office space replacing an existing window, Insertion of new entrance door replacing an existing hatch to provide access to a new lower ground floor cycle store and showers facilities to serve the building and the reconfiguration of the existing external staircase within the existing side passage

MARCH 2021



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1.0 INTRODUCTION

a. Overview

- 1.1 This planning application has been prepared by Alsop Verrill Ltd, chartered town planners in collaboration with Cummings Commercial, chartered surveyors, on behalf of Salaft Properties Ltd.
- 1.2 The application seeks external elevational changes which as part of a comprehensive programme of refurbishment will bring the existing unused lower ground floor space into productive use as office accommodation.

Image 1: 20 Flaxman Terrace, 1950s Extension – Illustrating the existing solid opaque glass blocks on the facade



- 1.3 The planning application building is a good example of post war commercial architecture and is situated in the Bloomsbury Conservation Area, the Conservation Area Appraisal makes no mention of it so it is assumed that its contribution is considered to be neutral by the London Borough of Camden.

- 1.4 There are several sound reasons for the proposal, and these are detailed at sections 1c and 1d below. Aside from the functional advantages, it is considered that the aesthetics of the proposal are sympathetic to the character and appearance of the conservation area. We trust that the London Borough of Camden, as local planning authority ('the LPA') will find that the design created by Nicola Roberts Architects, informed by advice from ourselves and from Bridges Associates, an architectural practice that specialises in heritage work, and the heritage assessment that is within this Planning and Heritage Statement, demonstrate that the external appearance of the building as proposed preserves or enhances the character and appearance of the Bloomsbury Conservation Area and does not harm its significance.

b. Planning Application Material

- 1.5 This Planning and Heritage Statement is accompanied by the following planning application material:

- Completed application forms;
- Site location plan;
- Photo sheet
- Plans prepared by Nicola Roberts Architects
 - Existing
 - Existing Lower Ground Floor Plan ((FT)01)
 - Existing Front Elevation ((FT)60)
 - Proposed
 - Proposed Lower Ground Floor Plan ((FT)05, Rev F)
 - Proposed Front Elevation FT)30 Rev C
 - Existing and Proposed
 - Existing and Proposed Part West Elevations ((FT)31) Rev B

c. Detail of the Proposal

- 1.6 It is proposed to comprehensively refurbish the existing unoccupied lower ground floor space to facilitate the creation of high quality office accommodation. This will enable Davies Maguire, structural engineers, to re-locate to it. Davies Maguire hopes to move into the space by mid-2021.

1.7 As part of these refurbishment works, the following external changes to the building are proposed;

- ❖ The replacement of the existing solid opaque blocks at lower ground floor level along the front elevation with powder coated metal windows;
- ❖ The replacement of the two existing lower ground floor side windows on the western elevation with powder coated metal windows;
- ❖ Insertion of new entrance door replacing an existing hatch, to provide access to a new lower ground floor cycle store and showers to serve the building.
- ❖ New entrance to the lower ground floor office space replacing an existing window.
- ❖ Reconfiguration of the existing external staircase within the existing side passage

1.8 The proposed plan details the full extent and location of these works.

d. Reasoning for the Proposal

i. Summary

1.9 The existing lower ground floor space is currently unoccupied and in a poor state of repair, as shown by **Images 2 – 5** overleaf.

1.10 The existing glass blocks prevent substantial levels of light from entering this floor. Their location directly onto the pavement has also resulted in water ingress into the building. A damp survey has been commissioned to confirm the extent of this prior to the refurbishment works.

ii. Works along the Western side the Facade

1.11 It is proposed to provide a new main entrance into the space from the western side passage through the provision of a doorway replacing an existing window opening.

1.12 The existing side passage fire escape lobby will be fully refurbished and insulated with the roof repaired.

1.13 Along the side passage, the following additional works are proposed:

- ✓ The external steps from the courtyard will be altered and rebuilt

- ✓ New entrance door to provide access to new cycle store and shower facilities to serve the building replacing an existing hatch.

1.14 As a result of their location along the existing side passage these changes are not visible from any public views within the Conservation area, and they will contribute to making the current uninviting space more welcoming and realising a viable purpose, which it currently lacks.

Image 2: Existing side window to be replaced *(Nicola Roberts Architects)*



iii. Replacement of Existing solid opaque blocks along Front Flaxman Terrace Elevation

1.15 A single window on the western elevation is all that provides natural light into the main office space. The replacement of the existing solid opaque glass blocks with powder coated metal windows is critical in ensuring that the refurbished space benefits from adequate natural light.

1.17 The key outcomes of the proposed new windows are therefore:

- ✓ To help improve the energy efficiency of the building;
- ✓ Allow more natural light into the space;
- ✓ Prevent existing water ingress and damp into the building;
- ✓ Improve the security of the building through utilising double-glazed, toughened glass and greater opportunities for surveillance onto the street.

- 1.18 The proposed windows will be galvanised polyester powder-coated metal-framed windows. The proposed style is particularly redolent of traditional fenestrations dating back to the early 20th century and is shown to fit well into heritage refurbishments but also offers a clean-cut aesthetic equally at home with contemporary designs. The proposed windows will provide the benefits of modern low energy glazing technology while retaining the heritage characteristics so important in this location.
- 1.19 Metal windows (either aluminium or steel) such as that proposed provide a number of benefits over other window types;
- ✓ Lightweight, versatile and durable;
 - ✓ Resilient to warping and corrosion;
 - ✓ Thermally efficient;
 - ✓ Recyclable;
 - ✓ Easily cleaned
 - ✓ Maintenance free;
 - ✓ Hard surface resists weathering and denting;
 - ✓ Long Lasting.
- 1.20 Today's polyester powder-coated finishes are extremely durable and, because they use no solvents, are more environmentally friendly than more traditional 'wet paint' finishes.
- 1.21 The proposed fenestration will be composed of six identically sized horizontal windows each comprised of 8 smaller panes. Their small panes would continue the contrast between the upper floors and the basement provided by the existing strips of the glass blocks on either side of the main door. They have been chosen primarily for their heritage properties and quality and sustainability credentials.

Images 3-5: Internal views of existing solid opaque blocks



2.0 CONTEXT

a. The Subject Building

- 2.1 20 Flaxman Terrace is a part 2, part 3 storey above ground commercial building. The entire building is currently in office use with the exception of the lower ground floor, which is utilised as ancillary storage space.
- 2.2 The building is defined as two elements; the original 1900s warehouse, known originally as No.19 Duke's Road, which fronts onto a small courtyard, and the later front and side extension fronting Flaxman Terrace, constructed in the 1950s.
- 2.3 As **Image 1** on page 1 demonstrates, the 1950's extension has created a mid-20th century frontage with a new feature entrance onto Flaxman Terrace which masks most of the original warehouse. This extension features a flat roof, with the hipped roof of the original building behind.
- 2.4 This Flaxman Terrace frontage is composed of yellow stock brick framing white rendering, with 6 sets of black framed horizontal traditional single glazed galvanised polyester powder coated steel windows on the ground and first floors. At lower ground floor level opaque glazed blocks are set within 4 larger sections either side of the central feature main entrance and stairwell, each comprised of 28 smaller blocks.
- 2.5 St. Luke's Marketing occupied the entire building from around 2002. it refurbished and occupied the ground floor as offices but didn't have the money to refurbish the lower ground floor as offices, with the space subsequently used as ancillary storage space. This use was further to a planning consent in May 2001 for the change of use from light industrial to office use. (Detailed on page 5 of this statement).

b. Location

- 2.6 Flaxman Terrace is located in a highly accessibility location between Euston and St Pancras railway stations (see **Map1** overleaf). This is emphasised with a Public Transport Accessibility Level of 6b, the highest level.

Map 1: Site Location



2.7 The building is located on the northern side of Flaxman Terrace and forms a triangular plot shaped by the configuration of Flaxman Terrace, Duke's Road and Euston Road. **Map 2** overleaf allows an appreciation of the shape of the site.

2.8 The surrounding environment is varied architecturally and home to a wide range of uses. Directly neighbouring the site to the north 17 Duke's Road, but also via later extensions facing Flaxman Place, adjacent to No20, is a complex of dance studios known as 'The Place'. Directly opposite is a six-storey Victorian mansion block known as 'Flaxman Court'. Its location is shown on **Map 2** and its Flaxman Terrace elevation on **Image 6** overleaf.

Map 2: Bird's Eye View: Looking North



Legend



Site Location



1
2
3

Flaxman Lodge

Flaxman Court

The Place Dance Studios

Image 6: Flaxman Court



c. Planning History

- 2.9 The entire building has been home to office accommodation further to a consent on the 19th May 2001, the lower ground floor has been unused for some time;

Change of use of the basement and ground floor from class B1(a) light industrial to Class B1(a) offices without complying with condition 1 of planning permission PL8601583.

- 2.10 Prior to this, the building was in use for light industrial purposes and between 1966 and 1997 in educational use for the University College London, further to 3 - 10 year permissions in 1966 (ref: L13/18/E/4378), 1976 (ref: L13/18/E/23574) and 1986 (ref: 9601583). The 1986 permission gave UCL use of the building until the 31st May 1997 with condition 1 stating;

"...the use shall be discounted and revert to light industrial use on the basement and ground floors, and office use on the first and second floors".

- 2.11 It is understood that in 1997 the building then reverted back to light industrial at lower ground and ground with office accommodation at first and second floor, in accordance with the condition and remained as such until the May 2001 consent – and office accommodation has remained throughout the entire building since.
- 2.12 Applications and subsequent appeals for a second floor roof extension to extend the office space available within the building were refused in 2016 and 2017 respectively as set out below;

1. Erection of single storey roof extension to provide 226sqm additional office space (Class B1a) and associated works (2016/0788/P)

Application refused 2nd March 2016 with subsequent appeal dismissed

2. Erection of single storey roof extension at second floor level to provide 233sqm additional office space (Class B1a), with associated cycle parking and refuse storage (2017/1968/P)

Application refused 11th April 2017 with subsequent appeal dismissed 8th November 2017.

- 2.13 As part of the ongoing refurbishment of the building an application was approved on the 1st December 2020 for;

Installation of external roof plant comprising 3 VRV/V RF units and 3 condenser units and erection of associated plant enclosure (2020/0941/P).

3.0 HERITAGE ASSESSMENT

a. Overview

- 3.1 20 Flaxman Terrace itself is neither listed nor is it considered to make a 'positive' contribution to the Bloomsbury Conservation Area in which it is situated. Opposite the Grade II listed Flaxman Lodge, each of which are designated heritage assets. The property is also located opposite Flaxman Court, which is a designated positive building. **Map 2** and **Image 6** on page 9 refer.
- 3.2 In accordance with the provisions of paragraph 189 of the National Planning Policy Framework the London Borough of Camden requires the completion of a Heritage Statement for all applications for works affecting the setting of a listed building or a Conservation Area.

b. Historic Context and Evolution

- 3.3 The Bloomsbury Conservation Area covers an area of London that expanded rapidly northwards over a 200 year period from 1660¹ towards Euston Road which was completed in 1756². The land between Euston and Russell Squares was fully built out with the completion of Gordon Square in 1860³.
- 3.4 Although initially developed as a residential area, its desirability as such had declined by the mid-19th century as London expanded further north with more fashionable and spacious residential villa developments in areas such as Belsize Park and St John's Wood⁴.

¹ 4.1 Bloomsbury Conservation Area Appraisal and Management Strategy (CAA) 2011

² 4.10 Bloomsbury CAA 2011

³ 4.19 Bloomsbury CAA 2011

⁴ 4.21 Bloomsbury CAA 2011

- 3.5 Bloomsbury subsequently gradually took on a new role as a centre for learning and enlightenment with the opening of the British Museum in 1753 and its expansion into the current building between 1825 and 1850 and the opening of University College London in 1829 and its subsequent expansions ever since, including occupying the subject building between 1966 and 1997.
- 3.6 The coming of the railways saw Euston Station open in 1837, followed by Kings Cross in 1852 and St Pancras 1868. This led to an increase in hotel and office developments to the north of the Conservation area, around Euston Road.
- 3.7 Flaxman Terrace was laid out in 1908. Its creation entailed the removal of two parallel streets – Brantome Place (formerly Draper's Place until 1885) and North Crescent Mews. **Map 3** shows these two streets. The Bloomsbury Conservation Area Appraisal and Management Strategy notes that many of the mews and lesser streets around the railway stations had declined to slums by the mid-1850s (paragraph 4.27), and as such this would likely have been the case here.

Map 3: OS London 1:1,056, 1893 -1895 (site location marked in red)



- 3.8 The former St Pancras Metropolitan Borough Council built Flaxman Court opposite as rented accommodation around the same time, to provide higher quality affordable housing. **Map 4** from 1947 illustrates these changes.

Map 4: OS London 1:1,250/1:2,500, 1947 - 1964



c. Conservation Area Context

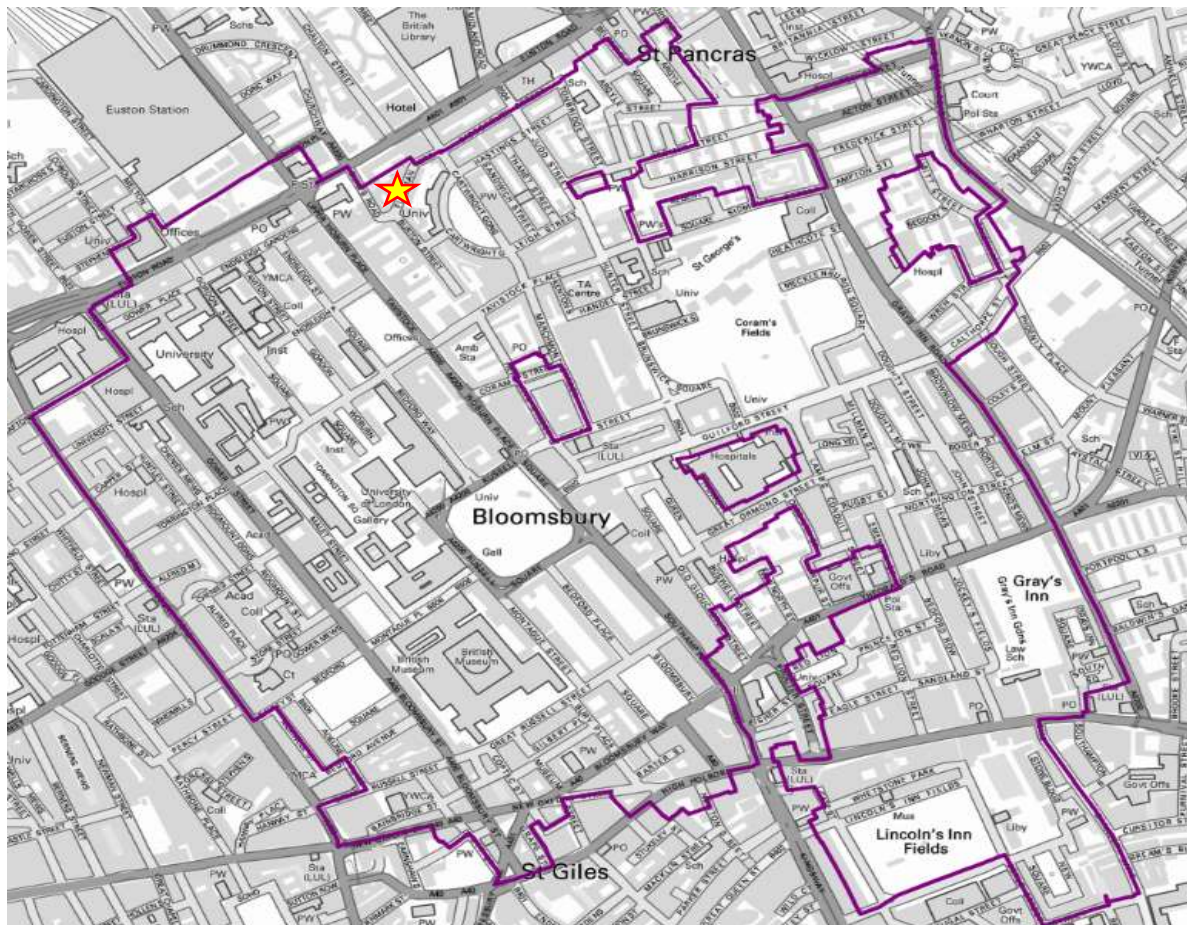
- 3.9 The property is located on the northern edge of the Bloomsbury Conservation Area within Sub Area 13 (see **Map 5** on page 14 and **Map 6** on page 15). The property is not mentioned within the Bloomsbury Conservation Area Appraisal and Management Strategy.
- 3.10 Sub-area 13 (Cartwright Gardens / Argyle Square) occupies an area that was mainly developed by James Burton and was one of the later areas of Bloomsbury to be completed.⁵

⁵ 5.225 Bloomsbury CAA

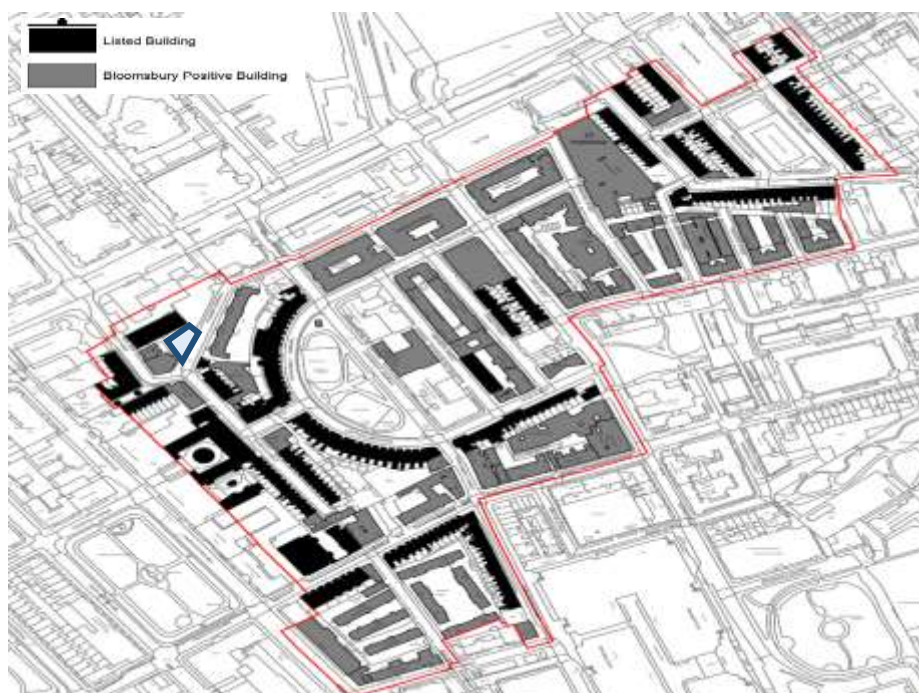
3.11 The subject building, however, is located outside this more homogenous townscape, paragraph 5.234 of the Conservation Area Appraisal stating;

at the northern end of Burton Street and East of Dukes Road there are a cluster of more decorative late 19th century and early 20th century buildings that mark the change from homogenous residential area to more mixed use and architecturally diverse townscape'.

Map 5: Location of the Site within the Bloomsbury Conservation Area



Map 6: Location of the Building within Sub-area 13 of the Bloomsbury Conservation Area



d. Listed Buildings

- 3.12 The Grade II listed Flaxman Lodge is located directly opposite the property. The listing description for this building and the attached railings reads as follows:

GV II

Pair of semi-detached houses designed to appear as one lodge. c1907-8. By Joseph and Smitham. For the Vestry of St Pancras. Brick, roughcast upwards from ground floor window level; continuous 1st floor stone cornice. Tiled roof with central gable, bracketed eaves cornice and tall brick end chimneystacks with cornices. Copper domes with finials to angle turrets. 2 storeys and basement. Symmetrical design. Central entrances, approached by steps, of part-glazed doors with overlights under a single segmental-arched hood on large brackets. Flanking narrow windows. 2-light sash above porch and under the gable at 1st floor. Angle turrets have transom and mullion windows with glazing bars to ground floors and similar windows without transoms to 1st floor.

INTERIOR not inspected.

SUBSIDIARY FEATURES: attached cast-iron railings to areas and steps; front railings with the St Pancras Vestry coat of arms with the motto "Constans Justitiam Moniti" ("Well Versed in Justice").

- 3.13 The Conservation Area Appraisal and Management Strategy describes the listed Flaxman Lodge as a local landmark (Paragraph 5.234). The paragraph continues noting that the Art Nouveau inspired railings, window detailing and use of materials are carried through its larger scale neighbour (Flaxman Court).
- 3.14 The former Drill Hall at 17 Dukes Road (Now forming the Place Dance Studios) to the rear of 20 Flaxman Terrace is also Grade II listed, although the proposed external modifications are not in a location so as to have any impact upon the setting of this building. The historic interest in the building primarily lies within its front elevation treatment on Dukes Road, and which has no relationship with the proposal.

e. Summary of Impacts

- 3.15 Although dating from the 1950s, 20 Flaxman Terrace is a relatively modern building within the context of the Bloomsbury Conservation Area and, therefore, of a very different style architecturally to the prevailing wider urban realm.
- 3.16 The proposed windows have been chosen for their suitability of design as part of the original building and appropriateness in the context of the Bloomsbury Conservation Area and individual heritage assets on the other side of Flaxman Terrace.
- 3.17 The works are crucial in ensuring that the space can function successfully and provide the proposed new tenants with the high quality office space they expect. Overall, we consider that the proposal would cause no harm to the significance of the nearby listed building and would as a minimum preserve the character and appearance of the Bloomsbury Conservation Area.

4.0 POLICY CONTEXT

a. National Planning Policy Framework (February 2019)

- 4.1 Paragraph 11 sets out the presumption in favour of sustainable development. For decision takers this means approving development proposals that accord with an up-to-date development plan without delay.
- 4.2 Paragraph 8 sets out the three overarching interdependent objectives of the planning system, which are considered in turn, with respect to the proposed development:
- ❖ **Economic objective:** The proposal provides useable office accommodation within a sought after and sustainable location.
 - ❖ **Social objective:** The proposal through ensuring that the space is utilised more effectively will provide additional employment opportunities within the building.
 - ❖ **Environmental objective:** The proposal will help improve the environmental efficiency of the building.
- 4.3 Paragraph 80 states that planning policies and decisions should help create the conditions within which businesses can invest and expand, with significant weight placed on the need to support economic growth and productivity, taking account of local business needs and wider opportunities for development.
- 4.4 Paragraph 81 states that planning policies should seek to address potential barriers to investment such as a poor environment. The proposal seeks the improvement of the existing poor internal space.
- 4.5 Paragraph 189 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. Section 3 of this report addresses this.
- 4.6 Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset's conservation (and the more important the asset, the greater the weight should be).

- 4.7 Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset from development within its setting should require clear and convincing justification. It is not considered that the proposed windows the type and proposed design of which has been thoughtfully procured will result in any loss of significance to the Bloomsbury Conservation Area or Flaxman Lodge opposite. This is as a result of its relative scale and through utilising the 'Crittall' style and type of window design which is most closely associated with early to mid-20th century modernist architecture.
- 4.8 Paragraph 196 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. As is the case here.
- 4.9 Paragraph 197 states that the effect of an application on the significance of a non-designated heritage asset (Such as Flaxman Court opposite) should be taken into account in determining applications. A balanced judgement is required when weighing such applications up having regard to the scale of any harm or loss and the significance of the asset. It is not considered that the proposal will result in any harm to Flaxman Court for the reasons outlined within paragraph 4.7 above.
- 4.10 Paragraph 201 is also clear that not all elements of a Conservation Area will necessary contribute to its significance. The host building could be considered to fall into this category, as it is not representative of the mass building that took place between 1660 and 1850 and the subsequent style of building that forms the basis of the Conservation Area designation.
- 4.11 It is considered that the proposed development will meet the aims of the NPPF.

b. London Plan (March 2021)

- 4.12 The new London plan was adopted in March 2021 and sets out the integrated, economic, environmental, transport and social framework for the development of London over the next 20-25 years.

- 4.13 Policy GG2c (Making the best use of land) states that those involved in planning and development should explore the potential to intensify the use of land to support additional workspace, promoting higher density development, particularly in locations that are well connected to infrastructure and amenities by public transport, walking and cycling.
- 4.14 Policy GG2d states that a design-led approach should be applied to determine the optimum development capacity of sites.
- 4.15 Policy GG5c (Growing a good economy) states that those involved in planning and development must plan for sufficient employment space in the right locations to support economic development. GG5h states that those involved in planning should recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success.
- 4.16 The building is located within the Central Activities Zone (CAZ). Paragraph 2.0.6 describes such areas as the primary locations for commercial activity in the capital, and they have a crucial role to play in supporting London's growth.
- 4.17 Policy SD4b (The Central Activities Zone (CAZ) states that the office functions of the CAZ should be supported and enhanced including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental value.
- 4.18 Policy SD4c states that the distinct environment and heritage of the CAZ should be sustained and enhanced.
- 4.19 Policy E1 (Offices) states that improvements to the quality, flexibility and adaption of office space of different sizes should be supported by new office provision and refurbishment.

- 4.20 Policy E2 (Providing suitable business space) states that development of B Use Class business uses should ensure that the space is fit for purpose having regard to the type and use of the space. The proposed development upgrades the existing B Use Class space ensuring that it is fit for purpose.
- 4.21 Policy HC1c (Heritage conservation and growth) requires development proposals affecting heritage assets, and their settings, to conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed.
- 4.22 The policy continues by stating that development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. Such thinking has informed the formation of the proposed scheme.
- 4.23 It is considered that the proposal complies with the aims of the new London Plan.

c. Local Planning Policy: Camden Local Plan 2017

- 4.24 The Local Plan sets out the Council's planning policies and vision for the borough. It forms a key document in the development plan upon which all decisions on planning applications should be taken in line with, unless there are material considerations that indicate otherwise.
- 4.25 Policy G1a (Delivery and location of growth) states that the council will deliver growth by promoting the most efficient use of land and buildings in Camden by supporting development that makes best use of its site, taking into account quality of design, its sustainability, heritage and other site specific specifications. The proposed development ensures that the building can be utilised more effectively while taking care to ensure the proposed windows are appropriate within the wider conservation area context.

4.26 Policy E1a (Economic Development) states that the council will support business of all sizes. Davis Maguire structural engineers are lined up to move into the space and the approval of the proposal will facilitate this.

4.27 Policy E2 (Employment premises and sites) states that the Council will encourage the provision of employment premises and sites and will protect premises that are suitable for continued business use.

4.28 Policy D1 (Design) sets requirements and standards to achieve the highest possible standards of design for all development, stating;

The Council will seek to secure high quality design in development. The Council will require that development;

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets;*
- c. Is sustainable in design and construction, incorporating best practice in resource management and Climate change mitigation and adaption;*
- e. Comprises details and materials that are of high quality and complement the local character;*
- f. Integrates well with the surrounding streets and open spaces;*

4.29 The Policy continues stating that the Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

4.30 The proposed windows have been sourced with care to ensure that they are the most suitable for the building and the surrounding conservation area context, and integrate well with the surrounding streets (Flaxman Terrace, Dukes Road and Burton Street) from which they may be visible.

4.31 The proposed windows have also been chosen as they represent the most suitable solution in maximising climate change adaption.

4.32 Policy D2 (Heritage) states that the Council will not permit the loss of substantial harm to a designated heritage asset, including conservation areas and Listed Buildings.

- 4.33 Specific to Conservation Areas the policy states that the council will require that development within Conservation areas preserves or, where possible enhances the character or appearance of the area.
- 4.34 Specific to Listed Buildings the policy states that the council will resist development that would cause harm to significance of listed building through an effect on its setting.
- 4.35 It is not considered that the proposal is of a scale to cause harm to the setting of the grade II listed Flaxman Lodge across Flaxman Terrace.
- 4.36 Policy CC1 (Climate change mitigation) states that the council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable. This includes supporting and encouraging sensitive energy efficiency improvements to existing buildings.
- 4.37 The proposal via the improved thermal performance of the proposed windows will lead to lower carbon emissions, heating loads and will result in an improvement for the lower ground floor EPC asset rating.
- 4.38 Policy C5 (Safety and security) requires developments to demonstrate that they have incorporated design principles which contribute to community safety and security

5.0 SUMMARY AND CONCLUSIONS

- 5.1 The planning application building is a good example of post war commercial architecture and is situated in the Bloomsbury Conservation Area, the Conservation Area Appraisal makes no mention of it so it is assumed that its contribution is considered to be neutral by the London Borough of Camden. It stands opposite 'Flaxman Court', a block of residential flats, which the LPA considers to make a positive contribution to the conservation area. The Grade II-listed Flaxman Lodge sits to the south of Flaxman Court.

5.2 The programme of refurbishment of the lower ground floor of the subject building includes the replacement of the black glass blocks at ground level on the Flaxman Terrace façade by metal windows. Several factors underlie the proposal:

- ❖ The glass blocks fail to allow sufficient sunlight into the lower ground floor, windows need to be installed to enable natural lighting that would improve the environment as a workspace.
- ❖ The consequences of substantial water ingress through gaps between the glass blocks and the surrounding wall over the years need to be rectified by a permanent solution that will not allow water through in the future.
- ❖ The windows proposed have a good thermal performance. The improved insulation to the lower ground floor will contribute towards reductions in energy use.
- ❖ Due to the possibility of impact damage to the ground level windows, the windows would incorporate toughened glass (for security and health & safety reasons). This requires a relatively thick frame profile.

5.3 In conclusion, the powder-coated metal-framed windows are considered to be in character. Their small panes would continue the contrast between the upper floors and the basement provided by the existing strips of the glass blocks on either side of the main door.

5.4 It is considered that the development proposed represents an appropriate solution to providing a fenestration that combines practical utility with a benign effect upon the character and appearance of both the application building and the Bloomsbury Conservation Area.

5.5 After assessment, it has been concluded that the planning application proposal accords with the relevant provisions of the Camden Local Plan and which is up-to-date.

- 5.6 In addition to the locally adopted policies against which the application proposal has been assessed, it also accords with the London Plan. Accordingly, it is compliant with the Development Plan. It follows that it is also compliant with the National Planning Policy Framework.
- 5.7 The applicant, therefore, respectfully requests that planning permission be granted.