



Head of Development Management
 Development Management
 Camden Town Hall Extension
 Argyle Street
 London
 WC1H 8EQ

21st October 2021

Dear Sir,

Planning (Listed Building and Conservation Areas) Act 1990
4 Guilford Place, London, WC1N 1EA
Covering Letter inclusive of a Design and Access and Heritage Statement

Simply Planning Limited (SPL) is instructed by our client, PA Housing, to submit the enclosed listed building application of a new cabling system linked to a new ground floor control cabinet at the above property. The new cabling would link to each of the existing flats on the first to fourth floor above together with the basement level below. The proposal is need to upgrade the existing warden call telecom and fire alarm systems throughout the building.

In addition to this covering letter, the application submission comprises the following:

- Location Plan;
- Completed Planning Application Form and Certificate A;
- Photographs of the interior of the application site.
- Architectural drawing package, prepared by RG+P, comprising the following documents

Drawing no.	Drawing Title	Scale
SP-01	Site Location Plan	1:1250 @ A4
100-215/(31)003 A	Floor Plans- Basement and Ground Floors	1:100 @ A3
100-215/(31)005 A	Floor Plans- First Floor	1:100 @ A3
00-215/(31)006 A	Floor Plans- Second Floor	1:100 @ A3
100-215/(31)007 A	Floor Plans- Third Floor	1:100 @ A3
100-215/(31)008 A	Floor Plans- Fourth Floor	1:100 @ A3

Factual background

The application site is a four storey, 18th terraced building including basement accommodation. Its current use is self-contained flats. The building forms part of the Grade II Listed Terrace at 3 to 6 Guildford Place (List entry number 1246376) and is located within the Bloomsbury Conservation area, it is therefore of historic value.

The Listing for the building describes the property as:

“Terrace of 4 houses. c.1791-1793. Built by J Tomes and W Harrison. Yellow stock brick, No.3 with slated mansard roof and dormers. 4 storeys, No.3 with attic, and basements. 3 windows each, No.3 with 2 windows and 5-window (2 blind) entrance front on the return, No.6 with 2 windows. Round-arched doorways with rendered reveals, pilaster-jambs carrying cornice-heads (except No.3), fanlights (Nos 3, 4 & 6 radial patterned); panelled doors. Gauged red brick flat arches to recessed sashes. No.3 with cast-iron balcony to 1st floor, 2nd window from right. Parapets. INTERIORS: not inspected: now converted to flats.”

There is no further site-specific landscape, or policy designations which relate to the site. The site is of no ecological standing and falls within the Environment Agency’s Flood Zone 1.

Planning History

The following applications are relevant in the context of this submission.

Application Reference Number	Description of Development	Decision	Decision Date
2019/0625/L	Replacement of internal doors and side screens with new to comply with fire regulations	Approved	13/05/2019
2016/6425/P	Replacement of external emergency light fittings within basement lightwells.	Approved	21/02/2017
2017/0018/L	Replacement of external emergency light fittings within basement lightwells and replacement of internal communal fire alarm system.	Approved	21/02/2017

The planning history shows that the building has been subject to previous successful Listed Building applications which have sought to ensure the building meets fire regulations and improve the fire safety credentials of the site. In this respect the proposals are no different.

Heritage Statement

Heritage Context and significance

No. 3 to 6 Guildford Place forms part of a Grade II Listed Building and sits within the Bloomsbury Conservation Area.

Policy Context

The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66(1) of the Act requires decision makers to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention... to the desirability of preserving or enhancing the character or appearance of that area'.

In July 2021, the government published a revised National Planning Policy Framework (NPPF) as the full statement of Government planning policies covering all aspects of the planning process. Section 16 of the NPPF deals with 'conserving and enhancing the historic environment'.

At Paragraph 194 the NPPF states:

"In determining planning applications, local planning authorities should take account of:

- ***The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;***
- ***The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and***
- ***The desirability of new development making a positive contribution to local character and distinctiveness."***

Paragraph 199 advises local planning authorities that:

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (the more important the asset, the greater the weight should be)."

Impact on Heritage Assets and Compliance with Policy

As shown within the accompanying drawings and photographs at **Document 1** the proposed cable route has been sensitively sited and hidden from view with the wiring enclosed within wire cable trunks to ensure the proposed works are concealed. The actual trunks would be white in colour and 25x16mm in dimension. The control cabinet, to be located in the ground floor front office, would be free standing on the floor and 600mm and 800mm in dimension

Furthermore, the internal cabling works are not of a permanent nature and can easily be reversed. They would therefore cause no harm to the historic or structural integrity of the building or to the significance of the Listed Building.

Overall, therefore, in recognition of the minor nature of the works, the proposed development is not considered to cause harm to the designated heritage assets. The proposals will preserve the historic value of the Listed building and will thereby satisfy the objectives of the statutory duty of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the national policy set out in the NPPF (paragraph 194, 199).

Accordingly, against this background, I trust these details can now be approved.



If there is any reason why the application cannot be registered, please contact me immediately otherwise we look forward to discussing this proposal with you. Should Officers be agreeable, we would welcome an accompanied site visit so that the proposed changes can be discussed in further detail.

Yours faithfully,

A handwritten signature in black ink that reads 'N. Halloran'.

Nathan Halloran

Assistant Planner

Encs.