

Delegated Report	Analysis sheet	Expiry Date:	15/10/2020
	N/A / attached	Consultation Expiry Date:	01/11/2020
Officer		Application Number(s)	
Nathaniel Young		2020/3591/P	
Application Address		Drawing Numbers	
20 Bloomsbury Street London WC1B 3QA		See Decision Notice	
Proposal(s)			
Erection of a mansard roof extension with 4 x dormer windows, to extend top floor flat.			
Recommendation(s):	Refuse Planning Permission		
Application Type:	Full Planning Permission		
Consultations			
Summary of consultation responses:	<p>The application was advertised in the local newspaper between 8th October 2020 and 1st Nov 2020. A site notice was displayed between 7th October 2020 and 31st October 2020.</p> <p>No responses were received from neighbours or members of the public.</p>		

<p>CAAC/Local groups* comments:</p>	<p>The Bloomsbury Conservation Area Advisory Committee object:</p> <p>The proposed mansard storey is in a section of Great Russell Street characterised by flat roofs. According to the Bloomsbury Conservation Area Appraisal of April 2011, Nos. 39-42 and 35-38 have strong horizontal banding and consistency in height that gives a very distinctive and consistent mid-19th century character. The mansard extension would break this consistency and would be detrimental to this prominent corner of the Bloomsbury Conservation Area.</p> <p>The mansard storey would also be harmful to the nearby terrace of Grade II listed Georgian townhouses at 24-60 Bloomsbury Street and 89-91 Great Russell Street, opposite, and the setting of the Grade I listed British Museum</p> <p>The proposed materials of Marley Edgemere interlocking concrete roof tiles and UPVC sash windows are inappropriate materials in a Conservation Area and do not inspire confidence.</p> <p>The BCAAC believes that the roof development would be entirely counter to the established streetscape of this part of Bloomsbury Street and Great Russell Street so we recommend that the Council refuse this application.</p>
	<p>South Bloomsbury Tenants and Residents Association (SBTRA) object:</p> <p>This association objects to this application for planning and listed building consent in the Bloomsbury Conservation Area on the following grounds:</p> <ol style="list-style-type: none"> 1. The proposals are contrary to policies D1 and D2 of the Camden Local Plan on the grounds that they fail to enhance the character and setting of the Conservation Area. This site is at an important gateway point to Bloomsbury and the British Museum and requires a high standard of design, material and sustainability. 2. The use of plastic UPVC windows is entirely inappropriate and represents a choice at complete variance with the stated aim of the Design and Access Statement which claims that the roof extension will enhance and protect this important heritage asset. 3. Marley interlocking concrete roofing tiles are also inappropriate in this setting and should be substituted by natural Welsh slate. 4. The material proposed for the flat roof above the mansard has not been specified, despite it being clearly visible from higher surrounding buildings. Standing seam lead roofing should be the only appropriate choice in this location. 5. The SBTRA also fully supports the detailed objections submitted by the Bloomsbury Association dated 27th October 2020. <p>This association consider that this application should be refused.</p>

The **Bloomsbury Association** objects to this application and wishes to make the following comments.

1. The proposal places inappropriate bulk and emphasis on a corner of Bloomsbury Street and Great Russell Street. This, one of the two matching eastern corners, is an earlier development that is subservient to the later Victorian buildings on the two western corners. These are punctuated by the dramatic roofscape of the Kenilworth and Bloomsbury Street hotels. To add further corner emphasis detracts from the setting of these buildings and also the setting of the British Museum and Bedford Square, from which it would be clearly visible. The two eastern corners are of a similar age, of the same materials and together engage in an architectural dialogue by marking the entrance to Bloomsbury Village. The streetscape cannot take any further skyline emphasis.

2. The proposal attempts to be a mansard storey in a part of Great Russell Street characterised by flat roofs. Indeed, the eastern part of Great Russell Street has a consistent parapet line, which this would break with an unsympathetic and inappropriate architectural expression. This would only serve to detract from the particular character of Bloomsbury Village and this part of the Bloomsbury Conservation Area.

3. Marley Edgemere interlocking concrete roof tiles are an inappropriate roofing material in a conservation area as are UPVC sash windows.

4. There appears to be no provision for any off-street storage of waste, contrary to Policy CC5 of the Local Plan and CPG:Design, Section 8.

5. The proposed development on the roof of the building, by reason of its design, siting, height, size and prominence, would be detrimental to the appearance of the host building and the character and appearance of the adjacent Bloomsbury Conservation Area. It would also be damaging to the setting of the terrace of Grade II listed Georgian townhouses at 24-60 Bloomsbury Street and 89-91 Great Russell Street, opposite, and the setting of the Grade I listed British Museum. This is contrary to policy D1 (Design) and D2 (Heritage) of the Camden Local Plan and paragraph 113 of the National Planning Policy Framework 2019.

The Association supports good quality design that will enhance Bloomsbury's streetscape, which this does not. This proposal does not meet the high standard required by Policy D1 and, with such a demonstrable breach of the Council's planning policy and of its supplementary planning guidance, we look to the Council to refuse this application.

We would be grateful if you would let us know of any further modification to the application; the decision, if it is to be decided under delegated powers, or the meeting date if it is to be decided by Committee.

Site Description

The site comprises a four storey building located on the junction of Bloomsbury Street and Great Russell Street. The property forms part of a terrace of buildings of similar height that are typically in commercial use on the ground floors, with residential or office use located on the upper floors.

The current use of the building is a bureau de change on the ground floor, with the first and second floors in office use. The third floor was converted to a two-bedroom flat in the recent past (planning reference 2013/4691/P). The first floor office is accessed via a secondary doorway on Great Russell Street, while the 2nd floor offices and 3rd floor flat share a stair core, accessed from Bloomsbury Street, independent of the ground floor shop unit.

The site is not listed but lies within the Bloomsbury Conservation Area. No.22 Bloomsbury Street, located on the opposite side of Bloomsbury Street, is noted in the Bloomsbury Conservation Area Appraisal and Management Strategy (BCAAMS).

There are nearby listed buildings at 89 -91 Great Russell Street, a terrace of three houses immediately north of the application site which are Grade II listed and also 98 – 103 Great Russell Street to the north west of the site are Grade II*/Grade II listed.

Relevant History

2015/1631/P – Planning permission REFUSED for *‘Erection of roof extension to create new 4th floor level and 1x residential unit with balcony. Replacement windows and installation of railings to front.’*

2013/4691/P – Planning permission for the change of use from office (Class B1) to residential (Class C3) comprising 1x 2 - Bedrooms flat at third floor level was granted subject to a S106 legal agreement on 02/10/2013. (this has been implemented).

Relevant policies

The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these are expected to be applied. It must be taken into account in preparing the Development Plan, and is a material consideration in planning decisions. The revised NPPF was published 24 July 2018 and updated on 20 July 2021

- 1.1 The Camden Local Plan was adopted by the Council on 3 July 2017. Other local documents which are of relevance include the Proposals Map and Camden Planning Guidance (CPG).
- 1.2 The relevant **Camden Local Plan 2017** policies are listed below:
- G1 (Delivery and location of growth)
 - A1 (Managing the impact of development)
 - A4 (Noise and Vibration)
 - D1 (Design)
 - D2 (Heritage)
 - T1 (Prioritising walking, cycling and public transport)
 - T2 (Parking and car-free development)
 - T3 Transport infrastructure)
 - T4 (Sustainable movement of goods and materials)
 - CC4 (Air Quality)
 - DM1 (Delivery and monitoring)

Camden Planning Guidance (CPG):

CPG Amenity (Jan 2021)

CPG Design (Jan 2021)

CPG Developer contributions

CPG Transport (Jan 2021)

Bloomsbury Conservation Appraisal and Management Strategy adopted 18 April 2011

Assessment

1. Site, setting and townscape

- 1.1 The applicant seeks planning permission for: *Erection of a mansard roof extension with 4 x dormer windows, to extend top floor flat*
- 1.2 The application site is 20 Bloomsbury Street. Bloomsbury Street itself is a relatively wide and busy south-bound one-way street. The site is located at the point where Bloomsbury Street and Great Russell Street intersect. Great Russell Street is also a relatively busy east-west route.
- 1.3 20 Bloomsbury Street/35 Great Russell Street is a 4 storey 19th century terraced building which occupies the pivotal corner plot on the SE corner of the junction of Bloomsbury Street and Great Russell Street. Many of the buildings that still populate Great Russell St and Bloomsbury Street appear in the 2nd edition OS map – indicating construction from mid to late 19th century. The south side of Great Russell Street, east of the junction with Bloomsbury St, is predominantly fronted by four-storey buildings with consistent heights and parapet lines.
- 1.4 On the NE corner of the same junction (22 Bloomsbury Street/92-93 Great Russell Street) is a 4 storey 19th century classically inspired brick building. Numbers 20 and 22 Bloomsbury Street, which stand on either side of the Great Russell St junction, have similar height and massing and similarities in disposition of opening. They are prominent and in the streetscene, appearing as a quasi-pair of matched sentinels when looking east along Gt Russell St.

- 1.5 The Kenilworth Hotel, the Ivanhoe Hotel (on the west side of Bloomsbury St) and 14-18 Bloomsbury St (on the east side) first appear in the 3rd edition OS map – indicating later, early 20th century construction. They are both younger and taller (6 storeys) than the application site and constructed from red brick in a more muscular style with stone string course detailing. The terraced building on the south side of Gt Russell St are of a similar date of construction to 20 Bloomsbury Street and are all without mansard roofs. The application site building is more associated in form and style with its older and contemporary neighbours than with the later buildings with more exuberant roofscapes.
- 1.6 There are several listed buildings around the site namely further south of the site, the corner property at the junction with Streatham Street, is 10 Bloomsbury Street which is Grade II listed. Further along east on the northern side of Great Russell Street is the British Museum which is partially Grade I and partially Grade II listed and a significant heritage asset in the borough. In addition to this, directly opposite the application site, on the northern side of Great Russell Street at the junction with Bloomsbury Street is a group of three Grade II listed terraces dating from the late 18th to early 19th centuries. These properties have three principal storeys and are three bays wide.
- 1.7 To the south of the site, the adjacent property is described in the Conservation Area statement as a five-storey late 20th century redevelopment with “clumsy detailing”, nevertheless even this still reflects the architectural treatment of the Edwardian hotel building opposite with its red brick and gables and thus is still in keeping with the character of the area.

2. Policy background & Principle of roof extension

- 2.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”). Section 72(1) of the Act requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area.
- 2.2 Paragraph 5.26 (ii) of the Bloomsbury Conservation Area Appraisal and Management Strategy (BCAAMS) notes that there is pressure for redevelopment across Bloomsbury and that roof extensions form part of the range of small scale change that can, cumulatively, have a significant impact on the character of the Conservation Area. This demonstrates that care must be taken in assessing proposals for roof extensions to prevent significant negative impact on the character of the Conservation Area. Paragraph 5.27 of the Strategy re-iterates the requirement for development proposals to preserve or enhance the character or appearance of the Bloomsbury Conservation Area. It highlights that this requirement also applies to developments which would affect the setting of the Conservation Area or views into or out of the area.
- 2.3 The BCAAMS notes in para 5.4 that *“Alterations and extensions can have a detrimental impact either cumulatively or individually on the character and appearance of the area. Examples within the area include: Inappropriate roof level extensions - particularly where these interrupt the consistency of a uniform terrace or the prevailing scale and character of a block, are overly prominent in the street”*. Para 5.38 makes it clear that *“The Conservation Area retains many diverse historic rooflines which it is important to preserve”*. The relevant underlying emphasis of the Strategy is on protection of characteristic and historic roofscapes.
- 2.4 The application site forms a prominent corner property within a wider terrace of four storey properties which runs from Bloomsbury Street into Great Russell Street, with a consistent parapetline and which retains its original roof arrangement. Adopted policy guidance in CPG Design outlines that where terraces or properties have remained untouched, roof alterations are

unlikely to be considered appropriate. It is considered that the application site sits more characteristically with the four-storey properties that continue along Great Russell Street than with the buildings immediately south along Bloomsbury Street. Thus the additional storey proposed for the host property would be out of character with the immediate surrounding context. The proposal would place inappropriate bulk and emphasis on this corner of Bloomsbury Street and Great Russell Street and would undermine the balanced composition of the facing buildings, numbers 20 and 22 Bloomsbury Street. The addition of the roof extension would also be at odds with the prevailing characteristics of the roofscape along this part of Great Russell Street. The development would cause less than substantial harm to the character and appearance of the conservation area, contrary to local plan policy D2.

- 2.5 Although the site is located in close proximity to listed buildings to the north and east, it is considered that the site is sufficiently distinct from the listed buildings that the proposals would not harm the setting of the designated heritage assets.
- 2.6 In summary, the construction of a highly visible roof extension at this prominent corner site would have a detrimental impact on the characteristic roofscape and townscape of this part of the Conservation Area and is inappropriate in principle.

3. Design and materials

- 3.1 The submitted drawings appear to significantly compress the height of the existing parapet to both street elevations. However the development appears to set the dormers and roofslope behind the retained parapets. This point would require clarification, and would be an essential component of an acceptable design of roof extension, should the objection to the principle of such an extension be overcome.
- 3.2 The design of the proposal is more conventional than the development which was refused in 2015, and responds more positively to Camden Planning Guidance on Design. As discussed above, the mansard slope on the street elevations appears to sit behind the raised parapet as required by Camden Design Guidance, and the extension would create a flank wall on the party boundary with the adjoining property on Great Russell Street. These design responses are considered to be generally appropriate.
- 3.3 However the use of uPVC windows and concrete slates does not respond acceptably to the prevailing use of timber windows and natural slate in this sensitive heritage location, contrary to policies D1 and D2 of the local plan. The choice of materials is therefore a reason for refusal.

4. Transport

- 4.1 The development proposes the extension to an existing flat which is the subject of a section 106 legal agreement obligation for use a car-free home. This restriction remains in perpetuity and therefore an extension to the size of the flat does not give rise to further transport obligations in respect of parking.
- 4.2 The site is in Camden's Central London Cumulative Impact Area for considering the effects of construction. The Council's requirements for Construction Management Plans (CMP) includes specific guidance and requirements for development within the Central London Area, in order to mitigate the harmful impacts of the interaction of high levels of construction and construction traffic with established business/residential travel patterns. The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network and due to the

location of cycle and pedestrian routes adjacent to the site. A Construction Management Plan (CMP) would therefore be required as part of any planning permission, with a specific requirement to address the considerations raised by the Central London cumulative guidance. The council's CMP pro-forma, which is required to be used as the template for CMPs, also includes measures to ensure that nuisance from dust, noise and other activities are minimised.

- 4.3 In the event that the development were acceptable, the CMP would be secured by a head of term to the s106 legal agreement. The CMP would need to take account of the potential cumulative impacts on the local highway network arising from other developments which are ongoing or planned in the locality. Once a contractor is retained engagement would be required on the draft CMP with local residents/businesses, Members and officers.

CMP Implementation Support Contribution

- 4.4 A CMP Implementation Support Contribution will be required in order to fund the specific technical inputs and sign off that are required to ensure that the obligation is complied with and the planning objectives achieved. The development falls within the Low Impact/Small development category in the February 2021 advice note on Implementation Support Contribution levels and the support contribution is therefore £3920, and would be secured by s106 legal agreement.

Construction Impact Bond

- 4.5 Construction activity can cause disruption to daily activities, however a well-run site that responds to the concerns of residents can greatly improve the situation. While most sites deal quickly and robustly with complaints from residents, and reinforce the requirements of the CMP with site operatives, there can be situations where this does not occur and officers in the Council are required to take action. Due to the scale of the development, duration of works and sensitive location of the site, a bond of £7,500, in accordance with the Council's published note on Construction Impact Bonds, would be secured as a head of term in a s106 legal agreement. The bond would be fully refundable on completion of works, with a charge only being taken where contractors fail to take reasonable actions to remediate issues upon notice by the Council.
- 4.6 There is no requirement to secure a highways re-instatement contribution for this development, as any damage that occurs to the surrounding footway due to the placing of scaffolding will be covered by the bond that is secured as part of the scaffolding licence process.
- 4.7 A s106 legal agreement is required in order to secure the three matters above. In the absence of such an agreement, the development would be likely to harm local amenity and the safe movement of pedestrians, cyclists and other road users. In the absence of a legal agreement to secure a construction management plan, construction impact bond and a financial contribution for construction management plan monitoring, the development would be likely to give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), T3 (Transport Infrastructure), T4 (Sustainable movement of goods and materials), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.

5. Other matters

- 5.1 The enlargement of the 2-bedroom flat to a 3-bed flat of c.110sqm would create generously sized accommodation which exceeds the nationally described space standards, with acceptable floor to ceiling heights. The provision of a 3-bed flat would be acceptable in this

context.

5.2 The additional height would have no significant impact on daylight to habitable rooms in nearby residential properties, due to the separation distances and site orientation. The new dormer windows would not introduce new opportunities for overlooking of existing sensitive windows, other than across the adjacent streets, which is considered to be an acceptable separation distance. The proposals are acceptable in terms of policy A1.

6. Conclusion

6.1 Paragraph 202 of the NPPF sets out 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.'* The development would lead to less than substantial harm to the Bloomsbury Conservation Area. The enlargement of the existing flat would not provide sufficient public benefits to outweigh the presumption against harm to the designated heritage asset, and therefore the application is refused.