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6 June 2022
Our ref: 1067

Planning Department
LB Camden
Town Hall
Judd Street
London
WC1H 9JE

Dear Sir/Madam

11 Regent Square, London, WC1H 8HZ

I enclose an application for planning permission and listed building consent for internal and external alterations to the above property, including stairlift from ground to second floor, internal lift from second to third floor, new doors to rear lower ground floor and the reinstatement of architectural features on front elevation, and the extension of the rooftop tank room. The application comprises the following documents and drawings

- Location plan: PA200
- Existing drawings: PA091, 0PA92, PA093, PA094, PA095, PA096, PA097
- Proposed drawings: PA201, PA202, PA203, PA204, PA205, PA206, PA208, PA209
- Heritage Statement (Spurstone Heritage Ltd, May 2022)
- This Planning, Design & Access Statement
- Personal Statement from applicants (June 2022)

Background to the applications

The property is a terraced house on the southern side of Regent Square and is Grade II listed. The site lies within the Bloomsbury Conservation Area.

The Heritage Statement describes the property in detail, along with the evolution of the terrace and the wider area. Of particular note is the damage caused to the terrace during WWII, which resulted in the post-War rebuilding of the adjoining properties of Nos. 9 & 10, and the top floor and closet wing of No. 11 itself. The interior of the property suffered further with the conversion into flats in the 1960s, then use as a Convent in the 1970s with further internal works in the 1980s.

Those previous uses ceased in the past, with the property once more a single family house. The house is one of only two family dwellings remaining in the



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terrace: the remainder of the terrace has seen the properties sub-divided into flats or used as HMOs.

The house was bought by the current owners in 2014 with the aim to renovate the property, which is in a poor state of repair, and to remain as a family house. However, in 2015 there was a major change in the owners' circumstances when Mr Smith developed a degenerative condition. This is explained further in the accompanying medical information and Personal Statement, but in brief summary means that walking became more difficult and this degeneration will continue until even in the house he will require a motorized indoor wheelchair.

In light of this significant change to personal circumstances, Mr & Mrs Smith submitted an application to the Council in October 2017 for internal works and reorganising the house, including the provision of an internal lift linking five floors of the house (ref. 2017/5989). This was withdrawn on the advice on the planning authority, who recommended a pre-application process be followed.

A pre-application submission was made to Camden in June 2018 and the pre-application process continued throughout 2019 and until March 2020. Formal applications were made in October 2020 for erection of a lift to the rear of the property from lower ground to second floor, an internal lift from second to third floor, and other internal and external alterations, which were refused in March 2021 (refs. 2020/4848/P & 2020/5385/L). Appeals against these refusals were dismissed in December 2021.

Throughout January to March 2022 a further round of pre-application discussions was held with the Council, showing a scheme that took into account the Inspector's comments and conclusions. This formal submission follows the conclusion of those discussions.

Planning policies

The Inspector's decision has clarified the relevant policies of the *Camden Local Plan 2017* that concern this property:

- *Policy D1* sets out the general criteria that seek to ensure a high quality of design in all development
- *Paragraphs 7.14-16* of the supporting text to Policy D1 relates to access to new and existing buildings. It requires new buildings and spaces to be inclusive and accessible to all. Any adaptation of existing buildings must respond to access needs whilst ensuring that alterations are sympathetic to the building's character and appearance.
- *Policy D2* sets out the approach to heritage, including listed buildings and conservation areas. The Council will require development within conservation areas preserves or, where possible, enhances the character or appearance of the area. The Council will resist proposals for alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building.
- *Paragraph 7.61* of the supporting text to Policy D2 relates to access in listed buildings and says that, where listed buildings are altered, disabled access should be considered and incorporated. The Council states it will balance the requirement for access with the interests of conservation and preservation to achieve an accessible solution. The Policy says that the listed nature of a building does not preclude the development of inclusive design solutions and the Council expects sensitivity and

creativity to be employed in achieving solutions that meet the needs of accessibility and conservation.

- *Policy C1* promotes health and wellbeing, and supports measures that will help contribute to healthier communities and reduce health inequalities.

The *Bloomsbury Conservation Area Appraisal and Management Strategy 2011* undertakes the appraisal of the area and includes Regent Square in 'Sub Area 12: Coram's Fields/Brunswick Centre'. The Appraisal outlines the evolution of the sub-area, including the erection of the listed terrace and the bomb damage during the War. The value of the open space area to the rear (St George's Garden) is discussed. No specific reference is made to the rear elevation of the Regent Square terrace as seen from those gardens.

The *Camden Planning Guidance: Design 2019* sets out the intention to seek design excellence in the Borough. It includes the requirement to preserve and enhance the character and appearance of conservation areas, and to have special regard to the desirability of preserving listed buildings. The document recognizes the need to provide access to listed buildings in paragraphs 3.32-34, stating

'It is important that everyone should have dignified and easy access to and within historic buildings, regardless of their level of mobility. With sensitive design, listed buildings can often be made more accessible, while still preserving and enhancing the character of the building.'

For listed buildings and other heritage assets, the Council will balance the requirement to provide access with the interests of conservation and preservation. Sensitive design solutions that achieve access for all, to and within listed buildings, should be sought where it is practicable to do so...

In order to support access for all, there are ways in which access can be provided to listed buildings that avoid removing features that contribute to their heritage significance and therefore their listing. Where features are retrofitted to a listed building in order to improve accessibility, care should be taken to ensure that any potential harm is appropriately prevented or mitigated.'

The *National Planning Policy Framework* sets out the policy approach for works affected heritage assets in Section 16. The application of this policy is comprehensively addressed in the accompanying Heritage Statement.

Appraisal of the proposed development

The previous overview of planning policy demonstrates that the development plan allows for the adaptation of listed buildings to provide improved access. Furthermore, there is a positive approach in the development plan towards proposals that enhance the accessibility of buildings and allow existing residents to adapt houses for mobility issues.

The development plan policy framework makes it clear that, in any such proposals, a thorough examination of the context of the area and the building itself must be undertaken. That assessment must also consider possible alternative solutions to adapting buildings.

This approach has been undertaken by the applicants. The pre-application process was undertaken in 2018-20, followed by the formal applications and the appeal. In light of the dismissed appeals a further pre-application process has been followed, resulting in this submission. The accompanying Heritage Statement assesses the significance of the application property as a listed building and the effect of the proposed development on the building.

The Inspector's decision on the appeals has now clarified the matters when considering works to the property:

- The previously proposed lift to the rear elevation was considered incongruous, harming the architectural significance of the building. This would have been visible from adjacent properties and in limited views from St George's Garden, leading to harm to the Conservation Area.
- The internal doors to the proposed external lift would have been visible and confused the historic plan form of the property.
- The proposed internal lift, being positioned in the rear rooms, would have disrupted the plan form of the property.
- The alterations to the rooftop room to provide stairs and additional glazing would be a minimal intervention that would have no appreciable impact on the listed building or the Conservation Area.
- The reinstatement of original features to the interior and exterior was work in favour of the proposals.
- The reinstatement works to the property were a public benefit, and the works to improve accessibility for a disabled person are a public benefit, but did not outweigh the harm identified by the Inspector. Similarly, the personal circumstances in favour of the proposed works did not outweigh the harm identified by the Inspector.

The current proposals have been modified to take into account these findings. The external lift is no longer proposed. A stair lift is proposed from ground to second floor, fixed to the floor and stair treads. The staircase is too narrow for the lift to continue up to third floor, so an internal lift will connect these floors but now placed into the existing circulation area rather than the rear rooms. The existing ladder to the rooftop tank room will be replaced by a stair, and that existing unattractive addition would be altered so as to be of a more attractive design.

Internal changes are again proposed to introduce a better layout to the property and original features, and reinstatement of external architectural features are also again included in this submission.

The Heritage Statement examines these changes and examines the public benefits arising from the works. The limited degree of change to the interior of the building addresses the matters raised by the Inspector with the previous appeals, whereby the internal lift retains the historic plan form, which is indeed further enhanced by the other internal alterations. The works to the rooftop room are the same as that proposed previously, which the Inspector found would have no appreciable impact on the building or the conservation area; the same conclusions must be drawn now.

Conclusions

Planning policy allows for the adaptation of listed buildings to improve accessibility. In the case of family homes the development plan seeks to provide for the needs of an existing family through improvements to usability throughout the lifetime of occupants.

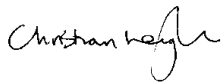
The property has suffered in the past from alterations and previous uses. It is one of only two properties in the terrace in the original use as a single family house, which is the optimum use for the listed building. The severe health difficulties of the current owners only materialised after purchasing the house. They wish to undertake the renovation of the property but it is a substantial investment which, given the mobility needs of the family, now also needs the works to provide access to all floors of the building.

Planning policies and guidance require an assessment to be made of a building, and an investigation of alternative ways to modify a building. This has been undertaken by the owners through years of pre-application discussion with the local planning authority, the Conservation Area Advisory Committee, the Georgian Group, as well as independent advisors.

The scheme presented now recognises the conclusions of the previous Inspector. Those conclusions led to clear comments on what was objectionable (the rear lift addition and the internal lift being placed within the rear rooms) and what was acceptable (the internal alterations, other external alterations, and the works to the rooftop addition). The current scheme therefore is less intrusive than the previous proposals for the building and there are wider public benefits arising from the works in addition to the benefit of providing the disabled access to this family house.

The proposed development would therefore satisfy the requirements of the development plan and national planning policy and planning permission and listed building consent can be granted.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Christian Leigh', written in a cursive style.

Christian Leigh