



SMPlanning

80-83 Long Lane,
London,
EC1A 9ET

Via Planning Portal only

15th July 2022

Dear Sir/Madam,

INTERNAL REFURBISHMENT AND RECONFIGURATION OF THE EXISTING BUILDINGS, DEMOLITION OF THE CLOSET WINGS, CONSTRUCTION OF TWO STOREY PLUS BASEMENT REAR EXTENSION, AND ALTERATIONS TO REAR FENESTRATION AND ASSOCIATED WORKS.

64-65 GUILFORD STREET, LONDON, WC1N 1DD

Please accept this covering letter as an accompaniment to a full planning and listed building consent application for proposed works at 64-65 Guilford Street, London, WC1N 1DD 'the site'. The applications are accompanied by a site location plan, existing and proposed floorplans, elevations, sections, Design and Access Statement and Heritage Statement.

The Site:

The site is located within the London Borough of Camden. The application site comprises of No.64 and 65 Guilford Street, a pair of connected late C18 townhouses, which form part of a Georgian terrace which extends from Herbrand Street to the west to Grenville Street to the east. The buildings are 4 stories (plus basement), constructed in yellow stock brick with stucco facing to the ground and basement. Each building is 3 window bays wide with fenestration proportions diminishing in height as you go up the facade. The properties are grade II listed (as part of a group comprising no. 61 -66) and located in Bloomsbury Conservation Area (Sub area 11: Queen Square/ Red Lion Square).

The surrounding area comprises C18 townhouses and C20 buildings in various uses including hotels, hostels, residential dwellings amongst others.

The site is in central London near to the Euston Growth Area. The site has a public transport accessibility level of 6b (the best). The site is located within zone 1 of the Environment Agencies flood mapping and therefore is at low risk of flooding.

The buildings are a hostel comprising of small single bedrooms off narrow corridors with communal kitchen(s) and bathroom(s) and rear yard. The buildings have been heavily altered throughout its

lifetime, including repair and replacement of parts of the buildings as a result of second world war bomb damage and significant changes to the original internal planform and associated internal fabric.

The Proposal:

The proposal seeks planning permission and listed building consent for the internal refurbishment and reconfiguration of the existing buildings, the demolition of the existing closet wings to both buildings, the construction of two-storey plus basement, rear extensions to both buildings, and alterations to the rear fenestration.

The works include:

Removal of modern internal partitions and closet wings

Installation of new internal partitions including bathrooms with associated servicing/ drainage, larger rooms and new shared kitchen and lounge space

Erection of a two storey plus basement rear extension including lift

Alterations to the rear fenestration

Localised repair and repointing works to restore the original facades, renovating of windows and repairing any roof damage.

External materials are proposed to match the positive elements of the historic building.

Replacement concrete paving with Limestone flags and paviour edgings

Renewal of the front yard at no.65

Planning history:

In June 2018 planning and listed building consent applications were submitted (ref 2018/3096/P & 2018/3670/L) for the partial demolition and erection of three storey rear extensions and mansard roof extensions with dormer windows to front and rear at both properties plus various internal and external alterations in association with conversion of building into self-contained flats. The applications were withdrawn.

In April 1996 permission was granted (ref 9501341R3) for the erection of a single-storey boiler enclosure to the rear, external alterations including the reinstatement of an entrance to No. 64 and the continued use of No. 64 and No. 65 as a hostel.

In February 1996 listed building consent was granted (ref: 9570232R3) for alterations and refurbishment including internal partitioning associated with the conversion of the buildings to a 32 bedroomed hostel.

Planning policy:

National

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development which incorporates three specific strands – economic, environmental and social.

Section 11 refers to the effective use of land and sets out that planning decisions should promote the effective use of land in meeting the need for homes and other uses whilst safeguarding the environment and facilitating healthy living conditions.

Section 12 refers to achieving well designed places and sets out that developments should be attractive, sympathetic to local character whilst creating accessible and inclusive places that secure a high standard of amenity for existing and future users.

Section 16 refers to conserving and enhancing the historic environment and sets out that there is a desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. The section continues, that great weight should be given to the assets conservation and that where harm arises to designated heritage assets public benefits will have to be demonstrated to outweigh the harm.

Local

For the purposes of this application, the adopted development plan for the London Borough of Camden comprises the London Plan (2021), the Camden Local Plan (2017) and Camden Planning Guidance Documents (CPG) Amenity (2021), Design (2021) and Energy Efficiency and Adaptation (2021).

The below policies are considered most pertinent to the determination of the application:

London Plan (2021)

- GG1: Building strong and inclusive communities
- GG2: Making the best use of land
- D3: Optimising site capacity through the design-led approach
- D4: Delivering good design
- D5: Inclusive design
- H9: Ensuring best use of stock
- HC1: Heritage conservation and growth

Camden Local Plan (2017)

- G1: Delivery and location of growth

- H3: Protecting existing homes
- H5: Protecting and improving affordable housing
- C6: Access for all
- A1: Managing the impact of development
- D1: Design
- D2: Heritage

Supplementary Planning Guidance

Design (2021)
Housing (2021)
Amenity (2018)

Planning analysis:

Principle of development

Law requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. The law also requires the Local Authority to have special regard to the desirability of preserving listed buildings, Conservation Areas and their setting.

Camden Local Plan Policy H3 seeks to ensure that existing housing continues to meet the needs of future households by resisting developments that involve the net loss of residential floor space provided within hostels.

The proposal makes no change to the existing use of the buildings (hostel). The proposal increases the amount of floorspace within the building and reconfigures the internal layout to improve the living environment for future occupants, including provision of larger rooms, en-suite bathrooms, improved access arrangements and improved shared space (kitchens and Lounge/ dining/ sitting areas). There would be no conflict with Policy H3 and the general principle of the proposed development is supported.

Design, Visual and Heritage Impacts

Section 72 of Listed Buildings and Conservation Areas Act 1990 places a statutory duty on decision makers to have special regard to the desirability of preserving and enhancing the character and appearance of conservation areas. Sections 16/66 of the same act places a similar duty in relation to listed buildings and their settings.

CLP Policy D1 seeks to secure high quality design in new development by ensuring it is sensitive to the local character, preserves or enhances the historical environment and provides a high quality, safe and sustainable form of housing.

CLP Policy D2 reflects the statutory duty insofar as it sets out that the Council will seek to preserve and where appropriate enhance Camden's rich and diverse heritage assets and their settings. The policy continues to set out that the Council will not permit harm to heritage assets unless the public benefits of the proposal convincingly outweigh the harm.

The site forms part of a grade II listed group of buildings (numbers 61-66 and attached railings) (list no: 1245858). The listing describes the building as:

"Terrace of 6 houses, now a hotel and houses. c1793-9. Built by James Burton. Flemish bond brick; front of Nos 61 to 63 partly rebuilt after damage in World War II. Welsh slate roof having brick ridge and end stacks. Double-depth plan. Nos 61-65: 4 storeys and basement, symmetrical 15-window range. Doorways; No.61 has C20 panelled door set in mid C19 semi-circular arched stucco surround, Nos 62 & 63 have late C18 fielded 6-panelled doors set in similar surrounds with late C18 fluted and reeded architraves, Nos 64 & 65 have flat arches over late C19 panelled doors set in ground floor of channelled stucco. Gauged brick flat arches to tall 1st floor C20 casements and plate-glass sashes. Continuous stucco sill bands beneath 1st and 3rd floor windows. Plain stone coped parapet. Late C18 sashes with glazing bars to rear of Nos 64 & 65. INTERIORS: retain late C18 dog-leg staircases with stick balusters set on open strings with fret-cut brackets and wreathed mahogany handrails. Late C18 enriched and modillioned plaster cornices survive in most rooms; mid C19 marble fireplace in 1st floor room of No.61; Nos 64 & 65 also retain late C18 shutters and panelled doors set in moulded and reeded architraves. Late C18 fireplaces noted to survive in some rooms which could not be inspected. SUBSIDIARY FEATURES: attached wrought-iron railings with urn finials to front. No.66: 4 storeys and basement. 3 windows. Ground floor of channelled stucco. Flat arch to doorway with late C19 panelled door with overlight. Ground floor sashes with flat arches and late C19 plate-glass. Upper floors have gauged brick flat arches to late C19 4-pane plate-glass sashes; 3rd floor stucco sill band. Stone coped parapet. To rear, late C18 sashes. INTERIOR: not inspected but noted as having late C18/early C19 dog-leg staircase with turned balusters. (Survey of London: Vol. XXIV, King's Cross Neighbourhood, Parish of St Pancras IV: London: -1952: 32)."

The site is also located in Bloomsbury Conservation Area (sub area 11 – Green Square/ Red Lion Square) which is characterised by a focal square surrounded by a network of streets which were developed in 17th and early 18th Century for residential and commercial purposes.

The building is referenced in the Bloomsbury Conservation Area Appraisal and Management Strategy (the Conservation Area Appraisal) as:

"grade II listed terrace of townhouses which adheres to a grander scale than other terraces in the area. These date from 1791-4 and were built by James Burton; the historic fabric of the terrace only partially survives and the properties have been much altered. This terrace when built formed the north side of Queen Square, and its centrepiece is marked by a colonnade on the front façade. The relationship with the square was destroyed when sites on the south side of Guilford Street were developed in the early 20th century."

The building is understood to have been heavily altered during the 20th Century, resulting in the considerable alteration and loss of historic fabric. Notably, the layout has been significantly altered,

there are no cornices or fireplaces within the buildings and the majority of the skirting and windows are non-original. Parts of the upper floor of the building were also re-built as a result of bomb damage during WWII. The wings to the building are relatively modern additions and are not of any architectural or historic significance. As a result, the historic and architectural significance of the buildings are considered to be limited to the principal façade and the internal staircases. The rear façade is evidently less significant than the principal façade in respect to the extent of modern alteration. The building possesses historic value by virtue of their longevity in the streetscape and association with notable architects and communal value derived from their relationship with nearby historic buildings.

External works

Both buildings benefit from existing modern rear closet-wing extensions. The extension to No. 64 appears to have been altered in the late 19th century, with the addition of the bow window, and at No. 65 the extension was constructed within the last 10 years. Neither additions are of any architectural or historic merit and therefore their demolition can be supported.

The proposed rear extensions are subservient to the host building, taking a part 3 part 2 story form of minor additional massing than the existing extensions. The proposed materials and detailing is to match the positive elements of the historic part of the building. The extensions will bring coherency and balance to the rear facades and would not result in the loss of any historically significant fabric. Given the rear location of the proposed extensions and the presence of several similar extensions to the rear of properties on the street, including no's 63, 65-66, 71, 72, 74, 75, 76 and 79.

The proposed repair/ renovation works to the windows, wall finishes, and roof are to match/ be sympathetic to the existing fabric and will improve the buildings longevity and appearance. The proposed replacement paving and associated levels changes will improve drainage and building damp ingress issues.

The proposal would preserve the character and appearance of the terrace in which the building site and would preserve the significance of the listed building, the contribution the buildings make to the character and significance of the Conservation Area.

Internal works

The buildings have gone through a number of unsympathetic changes, with little regard to the original historical interest. Both buildings have lost architectural features and their Georgian plan form, resulting in sub-standard accommodation and low-quality interiors that are now of low historic interest. The proposal seeks to readdress the poorly designed spaces, removing the sub-dividing partitions, revealing and reinstating legibility of the historic plan form making-good the architectural elements whilst simultaneously providing improved access. The proposed internal works enhance the special architectural and historic interest of the listed building.

Overall, the proposed works are considered to result in a significant enhancement of the historical fabric of these two listed buildings, bringing back historical features and proportions that had previously been lost through unsympathetic alterations. Furthermore, the proposal will bring the

buildings back into use with subsequent benefits of ongoing maintenance and repair. The proposal accords with Camden Local Plan Policies D1 and D2 and meet the statutory duties contained in sections 16,66 and 72 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990.

Neighbouring Amenity

CLP Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of neighbouring residents.

The proposed extensions comprise a modest increase in scale to existing rear closet wings and would not give rise to any materially different impacts on neighbours in relation to outlook and daylight and sunlight. Whilst some additional side facing openings are proposed, owing to their juxtaposition with neighbour buildings and intervening built form, they would not offer any new overlooking opportunities into neighbouring habitable rooms or primary amenity space. The proposal will preserve neighbour privacy. The proposal would not harm neighbour amenity and would accord with the aspirations of CLP Policy A1.

Living conditions of future occupants

London Plan Policy D6 sets out that all new dwellings should be of high-quality design, provide adequately sized rooms, provide adequate ventilation, daylight and privacy and private outdoor amenity space. Camden Local Plan Policy H6 requires all new residential dwellings to meet the nationally described minimum space standards.

Whilst the proposal is not for self-contained residential accommodation, all proposed habitable rooms are served by a window, giving ample levels of natural light. The layout of property provides generous living and communal space with improved accessibility, constituting a significant improvement to the existing arrangements. The proposal would provide a high quality living environment for the future occupants in line with LP Policy D6 and CLP Policy H6.

Highways, parking and servicing

The proposal does not alter the existing access, parking and servicing arrangements.

Summary & Conclusion:

As demonstrated within this letter and associated supporting documents, the proposed works preserve the significance of the listed building and the contribution the building makes to the character of the conservation area. The proposal provides a significantly improved living environment for the future occupants of the hostel by way of improved living space, accessibility and provision of communal space. The proposal would not harm neighbour amenity or adversely affect existing parking

and serving arrangements. The development is in accordance with the relevant Development Plan Policies and therefore it is respectfully requested that planning permission is granted.

I trust this letter and the enclosed documents provide you with sufficient information to determine the application but if you require any points of clarification or have any questions, please do not hesitate to contact me.

Yours faithfully

Stuart Minty
Director
SM Planning