



**Date: 15/09/2022**  
**Our ref: 2022/3224/PRE**  
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Simon Chapman  
*By email*

[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Dear Simon,

**Re: Ruspini House, 20-24 Parker Street, London, WC2B 5PH**

Thank you for submitting a pre-planning application enquiry for the above property, which was received on 19/07/2022, with the required fee of £4,062 received on 02/08/2022.

### **1. Drawings and documents**

601/E/200 Rev. PL1; 601/E/201 Rev. PL1; 601/E/210 Rev. PL1; 601/E/211 Rev. PL1; 601/E/212 Rev. PL1; 601/GA/001 Rev. PL1; 601/GA/002 Rev. PL1; 601/GA/100 Rev. PL1; 601/GA/101 Rev. PL1; 601/GA/102 Rev. PL1; 601/GA/103 Rev. PL1; 601/GA/104 Rev. PL1; 601/GA/105 Rev. PL1; 601/GA/106 Rev. PL1; 601/GA/110 Rev. PL1; 601/GA/111 Rev. PL1; 601/GA/112 Rev. PL1; 601/GA/113 Rev. PL1; 601/GA/114 Rev. PL1; 601/GA/115 Rev. PL1; 601/GA/116 Rev. PL1; 601/GA/202 Rev. PL1; Pre-Application Planning Statement July 2022 (prepared by RPS Group); Pre-App Planning Appendix Photos 12/09/2022.

### **2. Proposal**

External alterations to the existing building, including the replacement of the windows in the front elevation; alterations to the openings in the rear elevation and installation of replacement windows and doors; erection of an external plant enclosure in the rear yard to accommodate an air-source heat pump; installation of solar PV panels on the main roof and installation of cycle stand; all in connection with the continued use of the building as six self-contained residential units.

### **3. Site description**

The site has a 3 to 4 storey plus mansard roof residential building located on the south-eastern side of Parker Street, in the Central London Area. It was built with Nos. 8-18 (even) Parker Street in the late 1980s as part of a mixed-use development. The lawful use of the building has been established as 6 self-contained residential units (see relevant planning history section below). The Pre-Application Planning Statement

notes that the units have been vacant for over two years and that the building is in need of substantial refurbishment.

The site is situated within the Seven Dials Conservation Area, and borders the Grade II listed 36 Great Queen Street and Grade II\* listed 34 and 35 Great Queen Street to the rear.

### Site constraints

Seven Dials Conservation Area  
 Seven Dials Local Plan Centre  
 Central London Area  
 SALP Knowledge Quarter  
 CMP Priority Area  
 Archaeological Priority Area  
 Article 4 – Basements  
 Community Infrastructure Levy Zone A  
 Underground development constraints – ground water flow, slope stability

## 4. Relevant planning history

**2021/2471/P** - Use as dwellinghouses (C3). **Certificate of lawfulness granted 25/10/2021** - for use of building as 6 residential flats

**2009/5944/P** - Erection of in-fill mansard roof extension at fourth floor level to provide additional living accommodation and the installation of windows at ground floor level on front elevation (in association with removal of garages and creation of additional living accommodation) to existing student accommodation (Sui Generis). **Planning permission granted subject to a Section 106 Legal Agreement 07/07/2010**

**PSX0005063** - The replacement of all windows with powder coated aluminium casement windows. **Planning permission granted 21/05/2001**

## 5. Relevant policies and guidance

- **National Planning Policy Framework (2021)**
- **London Plan (2021)**
- **Camden Local Plan (2017)**
  - A1 – Managing the impact of development
  - A3 – Biodiversity
  - A4 – Noise and vibration
  - D1 – Design
  - D2 – Heritage

- CC1 – Climate change mitigation
  - CC2 – Adapting to climate change
  - CC3 – Water and flooding
  - CC5 – Waste
  - H1 – Maximising housing supply
  - H6 – Housing choice and mix
  - H7 – Large and small homes
  - T1 – Prioritising walking, cycling and public transport
- **Camden Planning Guidance**
    - Amenity CPG (2021)
    - Biodiversity CPG (2018)
    - Design CPG (2021)
    - Energy efficiency and adaption (2021)
    - Home improvements CPG (2021)
    - Housing CPG (2021)
    - Transport CPG (2021)
    - Water and flooding CPG (2019)
  - **Seven Dials Conservation Area Statement (1998)**

## 6. Assessment

### Principle of Development

The refurbishment of the existing 6 self-contained residential units within the building forms the basis of the proposals. The units currently comprise 2 x 4 -bed maisonettes, 2 x 3-bed maisonettes, 1 x 2-bed flat, and 1 x 1-bed flat. The officer's report for application ref. 2021/2471/P (see 'Relevant planning history' section above) states that the units were previously let at a subsidised rate to masonic members or their relatives who were in higher education or the first few years of employment; however, they have been vacant since 2019 as this use was no longer considered viable.

The proposals seek to make a number of internal alterations to the units to reconfigure their layouts to enhance the quality of living accommodation. This would result in some units increasing in size (through the loss of some communal hallway spaces), and the replacement of both 4-bed maisonettes with 3-bed maisonettes. All units would remain dual aspect and would exceed the Nationally Described Space Standards, and the rear courtyard would be subdivided to provide the maisonettes at Nos. 20 and 24 with their own private outdoor space.

Whilst these internal alterations would not be considered to constitute development, Policy H1 supports the maximising housing supply through working to return vacant homes to use. Policy H6 requires that dwellings are high quality and meet the

Nationally Described Space Standards. Furthermore, Policy H7 notes that 3-bedroom market housing is a higher priority than 4-bedroom market housing. The proposed internal refurbishment to improve the quality of accommodation is therefore supported.

## **Design and Heritage**

### Front elevation

The development of 8-24 (even) Parker Street, of which the host building forms a part, is built of yellow London stock brick and was designed to resemble the terraces and warehouses that used to line the street and occupy the area. Modern details are included at ground floor level fronting Parker Street, including pillars, circular porthole style windows, and a band of blue tiles which runs across the base of the entire front elevation of the buildings. The front doors and windows to both the front and rear are regular in form, location, style and materials which results in a very consistent fenestration to both the front and rear elevations of the buildings.

Although the building is not identified as a positive contributor to the character and appearance of the Seven Dials Conservation Area in the Conservation Area Statement, this document dates from 1998. The Council's Conservation Officer considers that, even though the building is a modern replacement, its form and detailed design does enhance the overall character of the street and therefore it does positively contribute to the significance and general appearance of the conservation area.

The proposed replacement of the existing white double glazed uPVC windows to the front and rear elevations of Nos. 20-24 (even) Parker Street with anthracite triple glazed metal units is therefore considered to be unacceptable, as it would harm the character and appearance of the conservation area through destroying the uniformity of the fenestrations. The existing windows should be retained and, if replacement is required, then this should be like-for-like. The replacement of the windows with windows of a different style, material or colour would only be considered as part of a joint proposal with Nos. 8-18 (even) Parker Street.

The front doors to the host building also match the front doors to Nos. 8-18 (even) Parker Street and these should also be retained.

The proposed replacement of the blue tiles to the front elevation with green tiles would also harm the cohesive design of the front fenestration, and is considered unacceptable. Any damaged tiles should be repaired like-for-like.

The proposed signage should be of the same style as the existing signage to Ruspini House and Nos. 12-16 Parker Street.

### Rear Elevation

As noted above, the proposal to replace the existing rear windows with anthracite triple glazed metal units is therefore considered unacceptable. Whilst the proposed enlargement of a number of rear windows at first, second and third floor levels would marginally increase natural light into the residential units, the alterations would interrupt the existing consistent fenestration pattern, to the detriment of the character and appearance of the building and wider conservation area.

Furthermore, the proposed installation of bi-fold doors with three panes of glass to terraces at ground, first, second and third floor levels would be aesthetically incongruous and would degrade the appearance of the rear of the building.

The proposed insertion of new doors and a replacement window at ground floor level to form access to a new outdoor area for the unit at No. 24 is considered acceptable; however, the size and detailed design of the doors should relate to the existing ground floor level doors and the windows above.

The proposal to combine two rear windows into one at ground floor level to unit No. 20 and at second and third floor levels to units Nos. 22.1 and 22.3 would be acceptable, so long as the size and detailed design of the proposed windows matches the design of the existing surrounding windows.

The proposal to infill the window to the first floor terrace of unit No. 20 and replace it with a wider high level window is unacceptable, and the existing window should be retained. It is noted that this window is proposed to serve an ensuite shower room, and so the lower window panes could be replaced with frosted glass if required.

### Plant, Ducting and PV panels

As part of the refurbishment of the building, the scheme proposes to remove the existing gas heating to the building and install a centralised, communal Air Source Heat Pump (ASHP) in a new enclosure within the rear courtyard. Given the location of the proposed rear plant enclosure adjacent to existing high walls, it is not considered that it would harm the character and appearance of the host building or the wider conservation area.

To supply the residential units from the ASHP, the installation of two new powder coated metal risers extending 3 storeys in height either side of the rear recessed gable is proposed. These metal risers would protrude from the building, disrupting the pattern and form of the rear building line, and would appear as visually domineering and incongruous elements. The repositioning of these risers on or within the building should be explored, as their current design and location is not considered to be appropriate.

The proposed ventilation grilles to be installed on the rear elevation of the building (to accommodate a new extraction system) are appropriately sized and follow a consistent pattern and therefore do not appear unduly intrusive. Consideration should be given to the most appropriate colour for these grilles to ensure they are viewed as discreet additions to the rear fenestration.

The proposed PV panels to be installed on the flat mansard roofs of the building would not be visible in public views and it is not considered that they would harm the character and appearance of the building or the wider conservation area.

## **Neighbouring Amenity**

### Light / Outlook

Owing to the siting of the proposed plant enclosure, it would not result in a loss of light to neighbouring properties. The proposed rear wall separating the rear terrace at No. 20 with the proposed plant enclosure may have a limited impact on light levels to this terrace, but it is not considered to be significant given the location of the terrace already enclosed by high walls to the rear and side.

The proposed provision of a bio-diverse roof above the internal plant enclosure, whilst small in size, would improve the outlook for the existing residential units and the neighbouring properties.

### Noise / Plant

As the scheme proposes the installation of new plant (Air Source Heat Pump and extraction system), a noise, vibration and ventilation assessment would be required to be submitted with any future planning application. This would need to include the following information:

- existing background noise levels measured over a 24-hour period (including the cumulative noise levels of all existing units);
- proposed background noise levels (including the cumulative noise levels of all proposed units);
- any proposed measures to reduce noise, fume emissions and vibration;
- the system manufacturers specification of the proposed equipment to be installed, altered or replaced;
- details of the method used to compile the report and examples of the calculations and assumptions made.

The noise impact assessment would need to demonstrate that the new plant would comply with Camden's noise standards (Policy A4), which state that the external noise

level emitted from plant, machinery or equipment shall be lower than the lowest existing background noise level by at least 10dBA, or by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises (with all machinery operating together at maximum capacity).

If this is not achievable, then the Council would expect suitable noise attenuation measures to reduce the noise levels of the proposed plant. Details of any necessary mitigation measures should also be supplied with the full planning application. Further details on noise and vibration can be found in CPG Amenity.

## **Sustainable Design and Construction**

### Refurbishment of building

As the proposal involves the refurbishment of more than 5 existing residential units, any application for planning permission must submit an energy statement and a sustainability statement to show how the proposals will reduce the energy, water and materials used in design and construction.

The energy statement must show how the development will:

- Follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies set out in the London Plan (2021) Chapter 9 (particularly Policy SI 2) to achieve the fullest contribution to CO2 reduction. GLA guidance on preparing energy assessments and CPG Energy Efficiency and Adaptation should be followed. In particular, improvements should be sought on the minimum building fabric targets set in Part L of the building regulations.
- Policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3<sup>rd</sup> stage of the energy hierarchy) wherever feasible, and this should be demonstrated through the energy statement. The reduction is to be calculated against emissions at the previous hierarchy stage and NOT against the baseline emissions.

The sustainability statement must show how the development will:

- Implement the sustainable design principles as noted in Policy CC2.
- Achieve 'Excellent' in BREEAM domestic refurbishment is encouraged with minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).
- The detail within the sustainability statement will be commensurate with the scale of the development.

In sustainability terms, the proposed replacement of the existing double glazed windows and doors with triple glazing is welcomed. However, as noted in the 'Design'

section above, the replacement of windows with new units would only be acceptable from a design and heritage perspective as part of a cohesive plan for the replacement of all the windows within Nos. 8-24 (even) Parker Street. If such a proposal were to come forward, consideration of the g-value of the glass would be required, to minimise solar gain and reduce overheating risk.

### Air Source Heat Pump

The proposed removal of the existing gas heating system and its replacement with a centralised, communal ASHP for heating purposes is considered renewable and is supported and encouraged. However, ASHPs are not considered renewable in cooling mode, as this is pumping unwanted heat out which uses energy, and Policy CC2 discourages active cooling. If the proposed ASHP is air to air and has the potential to provide active cooling, and dynamic thermal modelling cannot demonstrate that there is a clear need for it after all preferred measures are incorporated in line with the cooling hierarchy, then it is likely that a condition would be required to ensure that the cooling function be permanently disabled.

A bio-diverse roof is proposed to be installed above the proposed internal plant enclosure. Such roofs have a number of sustainability benefits, and the proposal is therefore supported. Consideration should be given to the most appropriate bio-diverse roof for the size and location, and details of the proposal should be submitted alongside any future planning application for an ASHP.

### Solar PV panels

PV panels work best in full sunlight. An overshadowing assessment should be undertaken and a maintenance plan should be included with the proposals.

## **Air Quality**

### Extraction system

The Council's Sustainability Officer notes that whilst the proposals would not be introducing new receptors, the site is located in an area of very poor air quality. The proposals to improve ventilation within the units through an enhanced extraction system should carefully consider the location of air inlets in relation to busy roads or any other pollution sources, and be as close to roof level as possible. The use of filtration of NO<sub>x</sub> and PMs may also need to be considered.

## **Transport**

### Cycle Parking



The proposed provision of 8 long-stay cycle parking spaces as part of the refurbishment of the residential units is welcomed. Covered secure cycle storage should be provided in accordance with Policy T1 and the cycle facilities section of CPG Transport, which details factors such as security, accessibility and spacing.

Camden M or Sheffield stands are required to be used for the provision of off-street cycle parking. Vertical and semi-vertical stands that require cycles to be lifted into place will not generally be supported due to issues with security and accessibility for all users.

### **Refuse and Recycling**

Policy CC5 and CPG Design are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments. CPG Design should be referred to for details of the design and location of waste storage areas and residential waste collection services in Camden.

## **7. Conclusion**

The internal alterations to the residential units to improve the standard of accommodation are not considered to constitute development, but are nevertheless supported by policies H1, H6 and H7.

Nos. 8-24 Parker Street, of which the host building forms a part, has been identified as enhancing the overall character of the street and making a positive contribution to the significance and general appearance of the Seven Dials Conservation Area. Any alterations to the front and rear fenestrations of the building should seek to retain the consistent fenestration pattern and detailing, and the replacement of windows and doors should only be considered in conjunction with Nos. 8-18 Parker Street.

Whilst the proposed replacement of gas heating with heating from a new ASHP is welcomed in sustainability terms, the positioning and design of the proposed risers connecting the rear ASHP with units needs to be reconsidered to ensure that it does not disrupt the pattern and form of the rear building line. A noise impact assessment is also required for the proposed plant and new extraction system.

The proposals would need to ensure that they meet the sustainability requirements for the residential refurbishment of 5 or more dwellings, which would be assessed through the submission of a sustainability statement and an energy statement.

## **8. Planning application information**

If you wish to submit a planning application for the proposed alterations to the rear windows and doors, new cycle stands, PV panels and air source heat pump and

associated acoustic enclosure, I would advise you to submit the following for a valid planning application:

- Completed form – Full Planning Permission Application
- An Ordnance Survey based location plan at 1:1250 scale denoting boundary of the application site in red
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and Access Statement, including photos of the front and rear elevations; the existing internal situation; the rear courtyard; and neighbouring properties.
- Energy Statement
- Sustainability Statement
- Noise Impact Assessment
- The appropriate fee (£407)
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a notice on or near the site and advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

If you have any queries about the above advice, please do not hesitate to contact me on the number above.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Charlotte Meynell  
Senior Planning Officer  
Regeneration and Planning