
Planning Statement

33 ELY PLACE, LONDON, EC1N 6TD

OCTOBER 2022

PREPARED FOR ESTATES & AGENCY
HOLDINGS LIMITED

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1.0 INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of Estates & Agency Holdings Limited (EAHL), and accompanies applications for full planning permission and listed building consent in respect of the office accommodation at 33 Ely Place ('the premises'). A site location plan showing the application site outlined in red is enclosed at **Appendix 1**.

1.2 The description of development, as set out on the accompanying planning application forms, is as follows:

"Replacement of existing rear extension, internal and external alterations, and other associated works."

Background

1.3 The application site is a four storey building, currently used as office accommodation by EAHL. The premises are a part of a Grade II listed terrace within Ely Place, and located off Charterhouse Street, in Hatton Garden.

1.4 The applicant is aware of the historic importance of the building, particularly in the context of the premises being a listed building and as such, pre-application discussions have previously been undertaken with the Council.

Pre-Application Advice

1.5 A pre-application submission was made to the Council on 24 May 2021. The application sought feedback from the Council regarding a proposal for the 'Replacement of existing rear extension, removal of existing M shaped roof and erection of new mansard roof extension with double set of dormers to the rear and internal alterations at all floors to listed building'.

1.6 A site visit was conducted on 01 September 2021, with Senior Heritage & Conservation Officer, Nick Baxter and Senior Planning Officer, Nora-Andreea Constantinescu. Written advice was received on 24 September 2021.

1.7 A copy of the original pre-application request by Hybrid Planning & Development (Ref: HPD/CD/17004), together with the Council's formal response (LPA ref: 2021/2625/PRE), are enclosed at **Appendix 2**.

1.8 Pre-application feedback from the Council confirmed that the site is a Grade II listed building within the Hatton Garden Conservation Area, and therefore the impact of any proposals

would need to be carefully considered in this context. Nonetheless, the Council considered that the replacement rear extension was appropriate for the site in terms of scale and proportions, was carefully considered in its context and would improve the relationship with the rear elevation of the host building such that the principle of a rear extension was acceptable subject to further details in relation to method of attachment to the listed building, glazed elements, and plant equipment.

- 1.9 The Council expressed concern at the loss of the last remaining and potentially original M-shaped 'butterfly' roof within the terraced row, together with the proposed mansard extension. As such, this element of the design has been removed. Likewise, and whilst the internal alterations at basement level were found to be acceptable, the internal alterations across the remaining floors of the listed building have been reviewed to retain the existing spine walls and to protect the majority of historic fabric and the original plan form, and in order to improve this element of the design. Due consideration has also been given to the removal of existing recessed spotlights, as appropriate.
- 1.10 At ground floor level, the existing door in the wall from the hallway to the front room requires widening, together with the provision of a traditional double door. This change was not viewed favourably in the pre-application response. However, such a change will retain the sense of the original arrival and access, and moreover, it will facilitate appropriate disabled access such that this element of the proposals remains within the current submission.
- 1.11 In this context, the submission has been informed by the pre-application comments received from the Council and the proposals amended wherever feasible in order to ensure an acceptable development.

Submission Documents

- 1.12 This Planning Statement has been prepared to consider the proposed development against the statutory development plan, and all relevant planning considerations. The Statement should be read in conjunction with the following documents and drawings:

Table 1.1 – Planning Documents

Document	Consultant
Application Form and Certificates	Hybrid Planning
Application Covering Letter	Hybrid Planning
Planning Statement	Hybrid Planning

Table 1.2 – Drawings and Plans

Dwg no.	Title	Scale
-	Site Location Plan	1:1,250
0110-PL02	Existing Lower & Ground Floors	1:50 at A1 / 1:100 at A3
0111-PL02	Existing First & Second Floors	1:50 at A1 / 1:100 at A3
0112-PL02	Existing Third Floor & Roof	1:50 at A1 / 1:100 at A3
0113-PL01	Existing Elevations	1:50 at A1 / 1:100 at A3
0114-PL02	Existing Section A-A	1:50 at A1 / 1:100 at A3
0115_PL02	Existing Section B-B	1:50 at A1 / 1:100 at A3
0116_PL01	Existing Section C-C	1:50 at A1 / 1:100 at A3
0210_PL03	Demolition Lower & Ground Floors	1:50 at A1 / 1:100 at A3
0211_PL03	Demolition First & Second Floors	1:50 at A1 / 1:100 at A3
0212_PL06	Demolition Third Floor & Roof	1:50 at A1 / 1:100 at A3
0213-PL02	Existing Demolition Elevations	1:50 at A1 / 1:100 at A3
0214-PL03	Existing Demolition Section A-A	1:50 at A1 / 1:100 at A3
0215_PL03	Existing Demolition Section B-B	1:50 at A1 / 1:100 at A3
0216_PL02	Existing Demolition Section C-C	1:50 at A1 / 1:100 at A3
0220-PL02	RCP Demolition Lower & Ground Floors	1:50 at A1 / 1:100 at A3
0221_PL02	RCP Demolition First & Second Floors	1:50 at A1 / 1:100 at A3
0222_PL02	RCP Demolition Third Floor	1:50 at A1 / 1:100 at A3
0310-PL04	Proposed Lower & Ground Floors	1:50 at A1 / 1:100 at A3
0311-PL04	Proposed First & Second Floors	1:50 at A1 / 1:100 at A3
0312-PL05	Proposed Third Floor & Roof	1:50 at A1 / 1:100 at A3
0313-PL03	Proposed Elevations	1:50 at A1 / 1:100 at A3
0314-PL04	Proposed Section A-A	1:50 at A1 / 1:100 at A3
0315-PL03	Proposed Section B-B	1:50 at A1 / 1:100 at A3
0316-PL03	Proposed Section C-C	1:50 at A1 / 1:100 at A3
0320-PL02	Riser Comparison Lower & Ground Floor	1:50 at A1 / 1:100 at A3
0321-PL02	Riser Comparison First & Second Floor	1:50 at A1 / 1:100 at A3
0322-PL03	Riser Comparison Third Floor & Roof	1:50 at A1 / 1:100 at A3
3501-PL01	Proposed Lower & Ground Floor RCP	1:50 at A1 / 1:100 at A3
3502-PL01	Proposed First & Second Floor RCP	1:50 at A1 / 1:100 at A3

Dwg no. contd.	Title contd.	Scale contd.
3503-PL01	Proposed Third Floor RCP	1:50 at A1 / 1:100 at A3
4301-PL02	Indicative Flooring Build Ups – Floor Details	1:10 at A1 / 1:20 at A3

Table 1.3 – Supplementary Statements

Document	Consultant
Design and Access Statement	DMBA
Heritage Statement	Palmer Heritage

Structure of the Report

- 1.13 This report provides a description of the application site and the surrounding area, and comments on the site’s planning history, in Chapter 2. Chapter 3 provides a summary of the development proposals, with Chapter 4 detailing the relevant planning policy. Chapter 5 sets out the planning and design assessment, including the heritage considerations. Chapter 6 draws together the concluding thoughts.
- 1.14 Overall, this proposal is considered to represent a form of development that is sustainable and accords with the relevant planning policy. In light of this, the proposal should be considered favourably by the Council, in accordance with the NPPF.

2.0 APPLICATION SITE AND SURROUNDINGS

Site Description and Surroundings

- 2.1 The application site is a four storey office building located within Ely Place in the Hatton Garden area of Central London.
- 2.2 The premises are part of a Georgian terrace on the eastern side of Ely Place. Although buildings on the northern end of the terrace sustained bomb damage in WWII, the application site itself was not affected. As such the building is largely original, in particular the front elevation. However, the rear of the premises have been altered over time and currently includes an unsympathetic ground and first floor addition.
- 2.3 The area to the north and west of the site, is characterised by office accommodation of similar Georgian style terraces to the application site. However, to the east and south, fronting Charterhouse Street, are more modern office developments including the De Beers Group building, and the Anglia Ruskin University buildings. As the premises are located at the southern end of the Ely Place terrace, these adjoining modern developments impact on the character of the rear of the site, being significantly higher and bulkier than the listed buildings.
- 2.4 Ely Place itself, is a relatively quiet and isolated cul-de-sac located off Charterhouse Street that retains an original porters lodge and gated entry to the south; and terminates at a wall and historic pedestrian link to Bleeding Heart Yard to the north. As such, the only pedestrian and vehicle access to the site is to the south via the porters lodge and onto Charterhouse Street.
- 2.5 The site is located approximately 0.2 miles (4 minute's) from both Farringdon Station to the east and Chancery Lane Station to the west. There are several bus stops in Charterhouse Street that provide services to Kings Cross, Clapham Park, London Bridge and Archway. Accordingly, the site is afforded an excellent public transport accessibility rating (PTAL) of 6b.

Listed Building

- 2.6 The application site is located within the Hatton Garden Conservation Area and is part of the Grade II listed Georgian Terrace on the eastern side of Ely Place (named in the National Heritage List for England as 26-34 Ely Place and attached railings).
- 2.7 The listed building description, as added to the National Heritage List in May 1974, relates to

the proposal site as part of the wider set of terraced properties. The relevant text of the listing states:

“9 terraced houses. c1773; Nos 26-30 rebuilt C20 in facsimile, Nos 31-34 restored top floors. Yellow stock brick; Nos 26-30 multi-coloured stock brick. Nos 30-33 with stone band at 1st floor. 4 storeys and basements; Nos 26-30 with attics and dormers. 3 windows each. Wood doorcases with Corinthian three quarter columns (No.34 with pilasters), fluted friezes with roundels and dentil cornices. Patterned fanlights. No.29 with service entrance in place of ground floor windows. Gauged brick flat arches (Nos 31-34 brown brick) to recessed sash windows, some with glazing bars. No.34 ground floor windows with stone architraved surround. Parapets. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings to areas”.

- 2.8 Therefore, as noted in the accompanying Heritage Statement, the significance of No. 33 Ely Place is primarily the setting and context of the site within Ely Place as part of the terrace; and the contribution of the quality and architecture of the main front elevation, to that setting.

Planning History

- 2.9 From the Council’s planning records, we are aware of the following planning history for 33 Ely Place (post the terrace being listed in May 1974):

- HB2847 – The breaching of the wall separating the two basement areas of 32 and 33 Ely Place and the installation of a new door to give access from 33 Ely Place to the fire escape staircase at 31 Ely Place. Conditional consent 12 May 1982.
- 9000026 – The demolition and rebuilding of the rear ground floor extension and internal alterations as shown on drawing numbers 1256/2B & 4 revised by letters dated 25 May 1990. Approved on 10 July 1990.
- 9070012 – The demolition and rebuilding of the rear ground floor extension and internal alterations as shown on drawing numbers 1256/2B & 4 revised by letters dated 25 May 1990. Consented on 10 July 1990.
- 2003/0160/P – The erection of a mansard roof and a two storey rear office extension together with the reinstatement of existing air conditioning units on the first floor flat roof area. Refused 22 October 2003.
- 2003/0164/L – The erection of a mansard roof extension and a two storey, rear office extension together with the reinstatement of existing air-conditioning units and associated internal and external works. Refused 22 October 2003.
- 2004/0877/P – The erection of a mansard roof extension to create additional office space. Approved 17 May 2004.
- 2004/0879/L – The erection of a mansard roof extension to create additional office space and associated internal alterations including a lift. Consented 17 May 2004.
- 2004/0881/P – The erection of a single storey rear office extension, together with the relocation of air conditioning units to the rear second floor flat roof area. Approved 17 May 2004.
- 2004/0884/L – The erection of a single storey rear office extension, together with the

relocation of air conditioning units to rear flat roof area at second floor level and associated internal alterations including a lift. Consented 17 May 2004.

- 2.10 Subsequent to the above, pre-application advice was sought for a scheme including *'Demolition of rear ground and part first floor extensions; excavation at basement level together with ground and first floor rear office extension, mansard roof extension and associated internal and external alterations'* in late 2015 (LPA ref: 2015/6636/PRE).
- 2.11 Following a site visit and meeting a letter of advice was kindly received on 04 March 2016. This advice is summarised below:
- A rear extension and mansard addition would be acceptable in principle given the context of the building.
 - The basement and first floor design is acceptable in principle.
 - The suggested materials are acceptable in principle.
 - Design detail is unacceptable for the following reasons:
 - Top heavy appearance to the rear elevation of the mansard roof extension;
 - Removal of fabric from first floor window opening unnecessary;
 - Loss of visibility of the rear window arrangement;
 - Design does not retain the sense of separation between modern and historic elements; and
 - First floor development is overbearing.
- 2.12 Most recently, an application to replace the damaged railings to the front boundary of the property (LPA ref: 2019/0526/L), was consented on 12 March 2019.
- 2.13 Notwithstanding the above, we turn now to provide an overview of the application proposals, which are the subject of this application for full planning and listed building consent.

3.0 THE DEVELOPMENT PROPOSALS

The Proposed Development

3.1 This application seeks planning permission and listed building consent on a proposal for:

“Replacement of existing rear extension, internal and external alterations, and other associated works.”

3.2 The proposal seeks to replace the currently outdated and unsuitable accommodation at the rear of the property with a high quality contemporary extension that will enhance the qualities of the listed building whilst providing much needed meeting accommodation to serve the established offices.

3.3 As such, it is proposed to demolish the current rear extension and to construct a new extension to house a spacious, level access boardroom, which will connect back to the existing doorway in the rear of the building.

3.4 The extent of the proposed works are shown on the submitted drawings (as outlined in Table 1.2); and the works to each level are described in more detail as follows.

Basement

- Modern partition walls from the rear basement room (currently forming walls to the WC and kitchen area), to be removed and reconfigured.
- Opening to be made between the front and rear rooms to form a wide doorway.
- Existing doorway to be blocked and form a wall.
- Minor removal of modern joinery.
- Existing plant to the basement level retained and refurbished.

Ground Floor

- Remove modern rear ground floor extension.
- Existing door wall from hall to front room to be widened, and double door inserted.
- Minor removal of modern joinery.
- Existing arch between front and rear rooms to have the top of the arch (currently modern recessed infill) removed, to form a fully open arch with glazed double doors.
- Removal of modern flooring and insertion of new.

First and Second Floors

- Remove existing first floor rear archives room (accessed from the ground floor);
- Modern partition walls to be removed from rear first floor room (currently enclosing WC and office on first floor, office on second floor), and single door inserted.

- Portion of existing wall between front and rear rooms to be demolished, to allow for a square arch to be formed, wall constructed in the area of the previous doors, and double doors inserted.
- Minor removal of modern joinery.

Third Floor

- Remove existing partition walls.
- Construct new partition walls to form a new WC.
- Minor removal of modern joinery.

Roof Level

- Existing roof to be retained and refurbished where necessary.
- Small opening to be made in roof to accommodate vertical riser for air handling.
- Installation of services equipment to be carried by a steel structure within V of butterfly roof shape, which will rest and be fixed on the party walls.
- Existing access to lift and lift over-run to be retained.

Rear Extension

- Rear extension proposed to the ground floor.
- Extension to the ground floor to be connected from the existing opening in the rear wall by a glazed atrium.
- Main form of the extension to be set away from the rear of the building with a small courtyard in between, and to extend to the rear wall of the existing yard space.
- Proposed extension to be formed predominantly of glass and timber with a sloping zinc roof, and a further small courtyard and atrium to separate the proposed boardroom area and WC facilities.

Other

3.5 Whilst not requiring planning permission, the office accommodation will also be refurbished internally with new floor coverings and decoration throughout, while the following works will require listed building consent:

- Creation of openings to the basement, ground, first and second floors.
- Replacement of lift in the area of the existing lift shaft.
- Introduction of vertical air handling riser from first to third floor, within the rear room, and associated ceiling ducting within rear room concealed by a dropped ceiling with replica coving; existing coving retained behind.
- Removal of existing ceiling spotlights, making good, and insertion of pendant ceiling lighting scheme.
- Refurbishment of existing finishes, and insertion of new timber and painted details.

3.6 We now turn to set out the strategic policy basis for the proposals.

4.0 PLANNING POLICY

4.1 Section 38 (6) of the Planning and Compulsory Purchase Act (2004) states that applications for development should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

National Planning Policy Framework (2021)

4.2 The new National Planning Policy Framework (NPPF), which was published in July 2021, sets out the Government’s planning policies for sustainable development and positive growth. The Framework prescribes a ‘presumption in favour’ of sustainable development (Paragraph 11) and supports proposals that are in accordance with the policies of an up-to-date development plan.

4.3 To achieve sustainable development, the following economic, social and environmental objectives need to be pursued in mutually supportive ways (Paragraph 8), and should be delivered through the preparation and implementation of plans and the application of the policies in the Framework; however, they are not criteria against which every decision can or should be judged (Paragraph 9):

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity, and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.4 Paragraph 9 of the NPPF continues by stating that planning decisions should play an active role in guiding development towards sustainable development solutions, but in so doing, should take local circumstances into account, to reflect the character, needs and opportunities of each area.

4.5 Paragraph 81 of the NPPF stipulates that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both

local business needs and wider opportunities for development.

- 4.6 The NPPF states at Paragraph 105 that development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. In assessing sites that may be allocated for development in plans, or specific applications for development (Paragraph 110), it should be ensured that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location. Development should only be refused on highways grounds if there would be an unacceptable impact on highways safety, or the residual cumulative impacts on the road network would be severe (Paragraph 111).
- 4.7 Paragraph 119 specifically states that planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.
- 4.8 The NPPF continues that the creation of high quality, beautiful and sustainable places, is fundamental to what the planning and development process should achieve, and states at Paragraph 126, that good design is a key aspect of sustainable development, creates better places in which to live and work, and helps make development acceptable to communities.
- 4.9 Planning policies and decisions should ensure that developments will function well and add to the overall quality of an area, are visually attractive and sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate mix of development and support local facilities and transport networks, and create places that are safe, inclusive and accessible which promote health and well-being, with a high standard of amenity for existing and future users.
- 4.10 In determining applications (Paragraph 134), great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 4.11 Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 4.12 The NPPF recognises that a balance needs to be struck between the preservation of the significance of a heritage asset and delivering public benefit. With regard to designated assets, Paragraph 199 states that the more important the asset, the greater the weight should be on its conservation. Distinction is drawn between those assets of highest

significance and those of a lesser significance.

- 4.13 The NPPF identifies harm as being either substantial or less than substantial. Paragraph 201 states that where the proposal would lead to substantial harm to the significance of a designated asset consent should be refused unless the harm or loss is necessary to achieve substantial public benefit that outweighs that harm. In cases where less than substantial harm to the significance of a designated asset is anticipated, Paragraph 202 requires that this harm should be weighed against the public benefits of the proposal. In respect of non-designated assets, Paragraph 203 requires a balanced judgement having regard to the scale of any harm or loss and the significance of the asset.

The London Plan (2021)

- 4.14 In March 2021, the Mayor’s Spatial Development Strategy for London, known as ‘The London Plan’, was adopted and provides the overall strategic plan for London, setting out an integrated economic, environmental, transport, and social framework for the development of London over the next 20-25 years.

- 4.15 The following policies from the new London Plan are considered relevant to the proposals:

- Policy GG2 ‘Making the Best Use of Land’ – advises that developments must proactively explore the potential to intensify the use of land to support additional workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- Policy D3 ‘Optimising Site Capacity through the Design-led Approach’ – encourages developments that take into account the current pattern and grain of spaces, scale, proportion and mass of neighbouring buildings, and the historic environment.
- Policy D5 ‘Inclusive Design’ – seeks to achieve the highest standards of accessible and inclusive design, in all new development in London. This is deemed key to ensuring that the built environment is safe, accessible and convenient and enables everyone to access jobs, opportunities and facilities.
- Policy E1 ‘Offices’ – encourages ‘improvements to the quality, flexibility and adaptability of office space of different sizes’.
- Policy HC1 ‘Heritage Conservation and Growth’ – recognises the importance of identifying London’s heritage assets and historic environment so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

Local Development Plan

- 4.16 The statutory development plan for the proposal site currently comprises the Camden Local Plan, which was adopted by the Council on 03 July 2017. The Camden Local Plan 2017 sets out the vision for shaping the future of the Borough, and contains policies for guiding

planning decisions.

Camden Local Plan (2017)

4.17 The following Local Plan policies are considered to be relevant to the consideration of the proposal:

- Policy G1 – Delivery and Location of Growth;
- Policy A1 – Managing the Impact of Development;
- Policy A3 – Biodiversity;
- Policy A4 – Noise and Vibration;
- Policy E1 – Economic Development;
- Policy E2 – Employment Premises and Sites;
- Policy D1 – Design; and
- Policy D2 – Heritage
- Policy CC1 – Climate Change; and
- Policy CC2 – Adapting to Climate Change.
- Policy CC3 – Water and Flooding;
- Policy CC5 – Waste;
- Policy T1 – Prioritising Walking, Cycling and Public Transport; and
- Policy T2 – Parking and Car-Free Development.

4.18 **Policy G1** aims to deliver growth across the Borough, including the provision of 695,000 sq. m of office floor space by 2031, by securing high quality development and promoting efficient use of land and buildings. The policy also seeks to support development that makes the best use of its site in terms of quality of design, its surroundings, sustainability, amenity, heritage, and transport accessibility.

4.19 **Policy A1** aims to protect the quality of life for all occupiers and residents; and balance this with the needs of the development. Issues to be considered include visual privacy and outlook; sunlight, daylight and overshadowing; and preparation of a construction management plan, as appropriate.

4.20 **Policy A3** acknowledges that the Council will expect developments to incorporate additional trees and vegetation wherever possible.

4.21 **Policy A4** advises that the Council will seek to ensure that noise and vibration is controlled and managed. Permission will not be approved for a) development likely to generate unacceptable noise and vibration impacts; or b) development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

4.22 **Policy E1** seeks to secure a strong economy by creating the conditions that encourage economic growth such as supporting businesses of all sizes; maintaining a stock of premises suitable for all businesses, and; supporting and promoting the various clusters of

businesses, services and creative industries including the jewellery industry in Hatton Garden.

- 4.23 New office development to the growth areas of the borough, including the Central London Area, will be needed to meet the forecast demand of 695,000sqm of office floor space. While the majority of new office space is expected at large Central London sites such as Euston, smaller scale office development will also occur across the Borough.
- 4.24 Similarly, **Policy E2** also seeks to protect employment sites by resisting proposals that include non-business uses. Instead, the Council seeks to 'have a range of sites and premises across the Borough to suit the different needs of businesses for space, location and accessibility'. Development in the Hatton Garden Area encourages jewellery uses and proposals for non-business use will need to include provision for jewellery workshops.
- 4.25 **Policy D1** seeks to secure a high quality design for all development that considers the local context and character and, in particular, preserves and enhances any heritage assets. Materials should be sustainable and durable, and of a high quality that complements the local character. In general, the Council welcomes high quality modern design, except where there is a homogenous design, such as Georgian Squares.
- 4.26 **Policy D2** aims to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets including conservation areas and listed buildings. The Council 'will not permit the loss of or substantial harm to' such assets unless it can be demonstrated that the substantial harm will have a significant public benefit. The Council will also not permit development that results in harm that is 'less than substantial to the significance' of the asset without public benefits that outweigh that harm.
- 4.27 In conservation areas, Policy D2 will support applications that preserve, and where possible enhance the character of the area. In respect of Listed Buildings, the Council will resist proposals that include alterations or extensions that 'cause harm to the special architectural and historic interest of the building'; or cause harm to the significance of a listed building through an effect on its setting. Policy D2 states that remains of archaeological importance will be preserved as appropriate.
- 4.28 Both **Policy CC1** and **CC2** require measures be included in building design, including listed buildings where appropriate, that improve resilience to climate change in the building design. Specific methodology will be assessed as appropriate to each proposal.
- 4.29 **Policy CC3** also seeks to ensure that development does not increase flood risk and reduces the risk where possible.

4.30 **Policy CC5** seeks to ensure developments include facilities for the storage and collection of waste and recycling.

4.31 **Policy T1** promotes sustainable transport by prioritising walking, cycling, and public transport in the Borough. Developments should provide for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3), and make provision for high-quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers. Specific requirements are referred to in the 'Camden Policy Guidance for Transport'.

4.32 **Policy T2** requires all new developments in the borough to be car-free, and states that the Council will support the redevelopment of existing car parks for alternative uses.

Other Material Considerations

4.33 Due regard has also been given to the following supplementary planning guidance:

- Camden Planning Guidance: Amenity (January 2021);
- Camden Planning Guidance: Design (January 2021).
- Camden Planning Guidance: Energy Efficiency and Adaption (January 2021); and
- Camden Planning Guidance: Biodiversity (March 2018).

Hatton Garden Conservation Area Appraisal and Management Strategy (August 2017)

4.34 The Appraisal confirms that the merit of the Hatton Garden Conservation Area is defined largely by the quality and variety of architecture as well as the unique pattern of streets, which is not limited to one particular period or style, but rather the combination of styles within their own groupings.

4.35 Georgian terrace buildings, including those along Ely Place (as specifically mentioned in the Statement), are recognised as making a particular contribution to the character of the Conservation Area with features including simply detailed exposed brickwork, sliding sash windows, flat window arches, slate roofs and front railings to basement light wells.

4.36 The Statement also recognises the considerable changes in use of buildings within the Hatton Garden Conservation Area throughout the last few centuries, as the area has transformed into a commercial and retail centre. The Statement explains that some large scale redevelopment has occurred as the result of World War II bomb damage including that to the north and east of Ely Place, however, many of the original plot widths remain the same.

5.0 PLANNING ASSESSMENT

- 5.1 This section of the report seeks to address the key planning issues arising from the proposal. These issues have been identified through pre-application discussion with Council Officers, and a review of the relevant planning policy for the site.

Principle of Development

- 5.2 Camden Local Plan (2017) Policies G1 and E1 identify a shortfall of 695,000sqm of suitable office space across the borough. While it is expected that much of this shortfall will be met by larger projects, small to medium sized sites such as no. 33 Ely Place, will be needed to help make up the balance of that requirement across the whole borough.
- 5.3 Notwithstanding, Policies E1 and E2 require a range of office space across Camden that will cater for the different needs of a variety of businesses. Proposals should not only cater for a range of new businesses, but also consider the growth of existing businesses. Policy T1, also encourages development that is within a sustainable location and promotes sustainable transport options.
- 5.4 In this respect, the building has been occupied by Estates & Agency Holdings Limited as their headquarters for many years, and continued growth of the business has created a demand for more flexible and welcoming office space to meet the current and future needs of the business. In the context of the existing building, the space needed to cater for the growth is not onerous. While the business could look to relocate to a slightly larger premises, this may be outside the borough, or within a less sustainable location. As such, the preference is to reconfigure the existing office space whilst improving accessibility for those with limited mobility and in light of the recent pandemic situation, to create an efficient air handling system that would avoid the need for permanently open windows (which is not feasible in the British climate), and to allow the office spaces to be more comfortably used by vulnerable staff members and visitors. Accordingly, the preference is to provide a modest reconfiguration of an existing office space in Central London. In the short-term, this will not only allow for the expansion of an established business; but will also contribute to the Councils existing stock of office space that is within a highly sustainable location.
- 5.5 As noted previously in the pre-application advice (Appendix 2 refers), the Council have no in-principle objection to the replacement rear extension to the premises.
- 5.6 As such the principle of the development is considered consistent not only with the National Polices of the NPPF, and the London Plan, but also with the Camden Local Plan (2017) Policies G1, E1, E2 and T1.

Design

- 5.7 Policy D1 of the Camden Local Plan (2017) requires a high quality of design for all development, and consideration must be given to the local context of the proposals. Therefore, the following issues are considered key considerations relevant to this application.

Local Context and Character

- 5.8 Policy D1 states that Council will seek to secure a high quality design for all new development which respects the local context and character of an area, and preserves heritage assets in accordance with Policy D2.
- 5.9 Ely Place is dominated by Georgian terraces on both sides of the street that are of a similar design and material, and it is this uniform setting that is significant to the listed building status of the terrace.
- 5.10 Although the terrace is uniform, at roof level all of the adjoining properties have a mansard roof extension, with the exception of the application premises. As the only premises without a mansard, No. 33 therefore appears as an anomaly in the otherwise uniform local setting. To the rear of Ely Place, the buildings have been altered over time, including No. 33, such that there is no remaining uniformity to the rear elevation as there is to the front elevation. Not only have there been additions to the rear of Ely Place, but new modern development to the south and east of the site, now dominate the setting of the site.
- 5.11 Within this context, the existing ground floor rear extension currently covers the entire footprint of the rear of the site with the exception of a small courtyard (4.5 sq. m) adjacent to the rear wall of the original building. The existing rear extension is of poor quality, and the space is currently unusable and dark. At first floor there is an existing small archives room of 12 sq. m, to the southern boundary of the site and set back from the original rear wall.
- 5.12 The proposal involves the demolition of the archives room and current rear extension, and the construction of a new extension to house a spacious, level-access boardroom, which will connect back to the existing doorway in the rear of the building. The proposed extension, though of a different shape, will be within the massing envelope of the existing extension, and will retain visibility of the rear façade of the listed building. This will be enhanced by the position of the extension itself, which will be set slightly further from the rear façade, and by its materials, which will be considerably less opaque and bulky in form, and ensure a high level of visibility and light throughout.

- 5.13 The proposed rear extension will cover 45.3 sq. m metres at ground floor level, to the extent of the existing boundary wall, as per the current extension. The proposed design includes increasing the area of the existing courtyard adjacent to the historic building by 1.5 sq. m, as well as the introduction of an additional courtyard of 3.2 sq. m, to the rear of the site boundary. As such, this proposal will reduce the footprint of the existing rear extension by 4.7 sq. m. Accordingly, and whilst the proposed rear extension will be contemporary in design and materiality, and spatially 'other' than the Georgian terrace, its design has been carefully considered in its context, position, scale and proportions, whilst respecting and seeking to enhance the qualities of the existing listed building.
- 5.14 Overall, the proposal will not appear incongruous or out of scale in the local context and will not have a detrimental impact on the character of the area. The proposal is therefore consistent with Policies D1 and D5 of the Local Plan (2017).

Materials

- 5.15 Policy D1 of the Local Plan (2017) requires new development to be of a high quality which considers the local context, including the choice of materials. Similarly, Policy D2 of the Local Plan (2017) seeks to preserve and, where possible enhance, the character of an area. This character is in part defined by the materials used and these should be retained, and responded to, in the design of any new development.
- 5.16 The proposal includes a mix of both modern and traditional materials. All refurbishment will be undertaken on a like for like basis. Internally, traditional styling is proposed, and features of interest will be retained. There will be minor removal of historic construction fabric to allow for greater accessibility; however the majority of the original fabric will be retained, and the original plan form of the building will also be largely retained.
- 5.17 To the rear extension, a mix of modern and traditional materials are proposed. Steel, timber and glazing will be used, allowing visibility of the listed building. As noted in the Heritage Statement, the materials will contrast with the historic construction and avoid pastiche.
- 5.18 The junction between the old and the new elements of the design is key to ensuring the history of the building is legible, and there is no detrimental impact to the significance of the listed building. In this respect, the glazed link at the rear will provide a clear visual separation and will be a 'light touch' providing a legible connection between the old and new elements of the design. A more traditional solid roof structure in this location would not be appropriate, as it would obscure the view of the rear elevation and replicate the current opaque and heavy appearance of the existing rear extension.

- 5.19 Overall, the materials specified will ensure that the proposal appears harmonious in the context of Ely Place and the listed building significance. Although modern materials are proposed, these are to the modern part of the rear addition and have been chosen to be sensitive to the listed building. The approach to interior change is one of traditional styling and harmonious materials where intervention is proposed. The majority of internal traditional features are retained. Furthermore, a 'light touch' has been proposed where old and new building elements meet. This will aid the legibility of the pattern of development over time, and is in accordance with the prevailing principles of conservation. As such the proposed materials are considered consistent with the NPPF as well as Policies D1 and D2 of the Local Plan (2017).

Servicing Equipment

- 5.20 The proposed extension to the rear, will also require the removal of the current plant equipment located on the flat roof of the existing ground floor rear extension, whilst due to the recent pandemic situation, and in light of the temperature and security issues inherent in permanently open windows, an efficient air handling system will be installed within the building. A number of alternative options for this were reviewed as part of the design process, to ensure that the vertical riser would be placed in a position least harmful to the plan form of the rear rooms. However, each of these reasons was dismissed for various reasons including encroachment on existing fireplaces and historic fabric. As set out in the supporting Heritage Statement, the option now presented by virtue of the proposals, will not encroach on any fireplaces and will only disrupt the existing modern coving in a small area. In addition, the horizontal ducting at each floor will be confined to the rear room areas, and will be housed within a lowered ceiling incorporating replica coving in order to retain the visual appearance of the rooms.
- 5.21 The proposal for the air handling units to be located at the level of the existing roof, has been examined in detail to ensure that minimal disruption is caused by its inclusion, whilst it also reflects the approach at other buildings in Ely Place. As such, the housing for the units will be carried by a steel structure within the V of the butterfly roof shape, and will rest on padstones on the existing party walls. Furthermore, the units will not be visible from the road or rear of the listed building, and there will be no visual disruption to the conservation area. Therefore, this location was considered most suitable and appropriate.

Amenity

- 5.22 Policy A1 requires new development to consider the impacts of development on the amenity of adjoining users. Matters such as privacy, over-looking and access to sunlight/daylight are all key considerations.

- 5.23 The proposal seeks the reconfiguration of the existing office space together with a replacement rear extension within Central London, and does not include any residential development. As such, it is not considered that the proposal would result in harm to neighbouring amenity. Notwithstanding, the proposed rear extension would not project higher than the existing boundary walls, and no harmful overlooking, loss of light or outlook, or over-shadowing would occur.
- 5.24 While the proposed extension will increase the amount of glazing on the roof and courtyards, which could potentially result in additional light spill, it is not considered that this will result in significant harm given the commercial nature of the site and the surrounding area.
- 5.25 Overall the proposal will not result in the loss of amenity to adjoining development and is therefore considered consistent with Policies A1, D1 and D2 of the Local Plan (2017).

Access, Car Parking, Highways and Servicing

- 5.26 Policy T1 and T2 of the Camden Local Plan (2017) seek to promote sustainable transport methods such as cycling, walking and public transport; and car-free development will be encouraged for all new developments.
- 5.27 As stated in the Local Plan Policy T1, the Council will expect developments to provide, as a minimum, the number of cycle parking spaces as set out in the London Plan. The Council will also seek an additional 20% of spaces over and above the London Plan standard to support the expected future growth of cycling for those that live and work in Camden
- 5.28 As previously noted, Ely Place is a cul-de-sac with a secure gated entry from Charterhouse Street. This inherently restricts the number of spaces available to each of the premises within Ely Place and therefore no additional car parking facilities are proposed as part of this proposal.
- 5.29 Likewise, no change is proposed to the existing cycle parking arrangements, and notwithstanding policy requirements, the site constraints clearly limit options to improve the current arrangement. However, the site has excellent access to public transport with bus, train and tube connections all within easy walking distance. As such the proposal will continue to encourage sustainable transport uses for employees, and is in accordance with Policies T1 and T2 of the Camden Local Plan (2017).
- 5.30 In respect of servicing, the proposal is not expected to increase demand for refuse and recycling collection and no change is proposed to the current collection arrangements.

6.0 SUMMARY AND CONCLUSIONS

6.1 This planning application is submitted on behalf of EAHL and seeks full planning permission for:

“Replacement of existing rear extension, internal and external alterations, and other associated works.”

6.2 The scheme has been designed to improve the current office accommodation of EAHL by providing a modest reconfiguration of existing office floor space in a sustainable location within Central London.

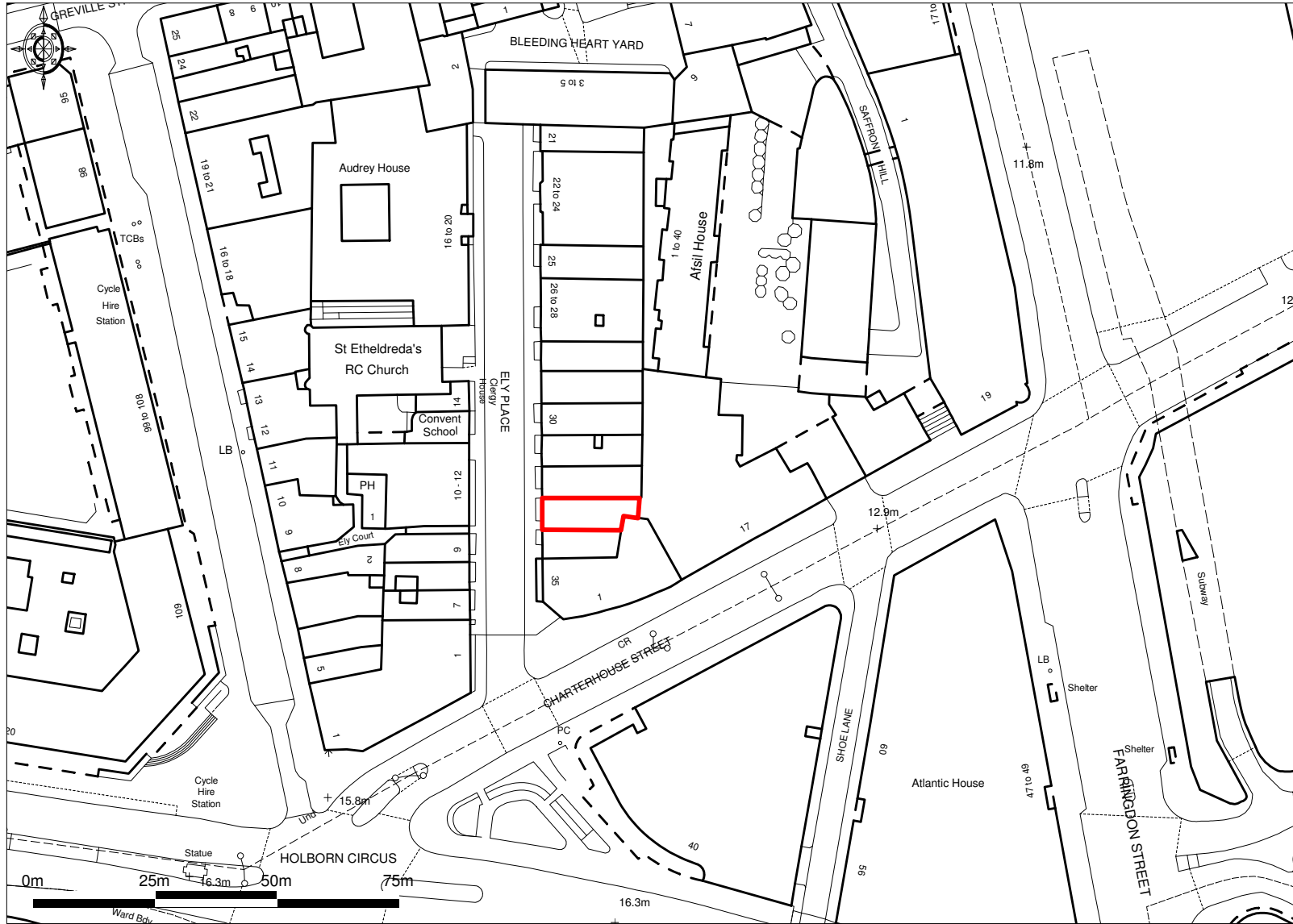
6.3 The proposal includes a replacement rear extension which is of a modern design and will be visually separated from the rear wall of the original listed building, as well as internal alteration and the addition of plant. The proposals will be of ‘less than substantial harm’ to the listed building due to the minor loss of historic construction fabric; however, they will improve the legibility and accessibility of the building as well as maintaining the building in a viable, safe use for the future, which is of public benefit.

6.4 As such, the proposal accords with the relevant national and local policies and will:

- Improve the office accommodation for an existing local employer;
- Be of an appropriate design, using high quality materials that respect the local character and in particular the listed building;
- Be in a highly sustainable travel location, with good public transport links; and
- Not result in a loss of amenity for neighbouring uses.

6.5 In light of the above, it is our view that the proposal is wholly compliant with the NPPF, The London Plan (2021) and the Camden Local Plan (2017), and therefore; entirely appropriate in planning policy terms.

APPENDIX 1



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Your Ref:
 Our Ref: HPD/CD/17004
 Date: 24 May 2021

Planning Department
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Dear Sir / Madam,

RE: REQUEST FOR PRE-APPLICATION ADVICE – 33 ELY PLACE, LONDON EC1N 6TD

On behalf of our client, Estates & Agency Holdings Limited (EAHL), we write to request a Pre-Application Meeting and Written Advice in relation to the replacement of the existing rear extension, internal alterations, and the provision of a mansard roof extension at 33 Ely Place; a Grade II Listed Building, within the Hatton Garden Conservation Area.

Accordingly, please find enclosed the following documents which comprise in addition to this letter, our formal request for a pre-application meeting, and written advice:

- Site Location Plan (at scale 1:1,250);
- Pre-Application Document (Rev A) prepared by Damion Marcus Burrows Architects;
- Pre-Application Heritage Statement prepared by Palmer Heritage; and
- Pre-Application Covering Letter prepared by Hybrid Planning & Development (this document).

The pre-application fee for changes to a listed building is £1,312 (incl. VAT) and will be paid following receipt of confirmation of this submission from the Council.

The proceeding sections of this letter outline the site's planning history, the proposal; relevant national and local planning policies, and requests advice on various matters.

SITE AND SURROUNDINGS

Ely Place, off Charterhouse Street, is a relatively quiet and isolated cul-de-sac within the Hatton Garden Conservation Area. The street consists of a terrace of basement plus four-storey Georgian terrace houses laid out by Mr Charles Cole (architect and surveyor), in circa. 1773. The street is gated with a porter lodge at its junction with Charterhouse Street. Number 33 is a grade II listed Georgian town house forming part of a terrace on the east side of Ely Place, which is currently used as office accommodation.

The listed building description, as added to the National Heritage List in May 1974, relates to the proposal site as part of the wider set of terraced properties. The relevant text of the listing states:

“9 terraced houses. c1773; Nos 26-30 rebuilt C20 in facsimile, Nos 31-34 restored top floors. Yellow stock brick; Nos 26-30 multi-coloured stock brick. Nos 30-33 with stone band at 1st floor. 4 storeys and basements; Nos 26-30 with attics and dormers. 3 windows each. Wood doorcases with Corinthian three quarter columns (No.34 with pilasters), fluted friezes with roundels and dentil cornices. Patterned fanlights. No.29 with service entrance in place of ground floor windows. Gauged brick flat arches (Nos 31-34 brown brick) to recessed sash windows, some with glazing bars. No.34 ground floor windows with stone architraved surround. Parapets. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings to areas”.

Within the terrace, 33 Ely Place remains relatively unspoilt. The building generally retains its historic proportions and original plan, as well as most of its original architectural features and joinery; some internal

partitioning and refurbishment, including the installation of a lift to the fourth floor has also taken place over recent years. However, the building is the only example in the terrace to retain its original M-form roof. The buildings at 26-30 Ely Place have been rebuilt in a Georgian style after what is suspected to have been World War II bomb damage. These buildings have relatively recent projecting rear extensions and mansard roof extensions.

Nearly all of the buildings on the eastern side of Ely Place have full width extensions at basement and ground floor levels. Above ground level there is not a uniform rear building line and many of the buildings have projecting rear extensions up to parapet level, and various roof lights and lanterns on the roofs of the rear extensions. This is particularly relevant at 32 Ely Place (adjacent), where a prism-shaped roof lantern runs the length of the extension to circa 1.5 metres in height.

The rear of 34 Ely Place has been partly obscured by a part of 35 Ely Place/1-9 Charterhouse Street, which wraps around the back of the listed building, butting up against the rear elevation for the full height of the building, and across half its width. The rear of this building is significantly higher and bulkier than the listed buildings.

PLANNING HISTORY

From the Council's planning records, we are aware of the following planning history for 33 Ely Place (post the terrace being listed in May 1974):

- HB2847 – The breaching of the wall separating the two basement areas of 32 and 33 Ely Place and the installation of a new door to give access from 33 Ely Place to the fire escape staircase at 31 Ely Place. Conditional consent 12 May 1982.
- 9000026 – The demolition and rebuilding of the rear ground floor extension and internal alterations as shown on drawing numbers 1256/2B & 4 revised by letters dated 25 May 1990. Approved on 10 July 1990.
- 9070012 – The demolition and rebuilding of the rear ground floor extension and internal alterations as shown on drawing numbers 1256/2B & 4 revised by letters dated 25 May 1990. Consented on 10 July 1990.
- 2003/0160/P – The erection of a mansard roof and a two storey rear office extension together with the reinstatement of existing air conditioning units on the first floor flat roof area. Refused 22 October 2003.
- 2003/0164/L – The erection of a mansard roof extension and a two storey, rear office extension together with the reinstatement of existing air-conditioning units and associated internal and external works. Refused 22 October 2003.
- 2004/0877/P – The erection of a mansard roof extension – to create additional office space. Approved 17 May 2004.
- 2004/0879/L – The erection of a mansard roof extension to create additional office space and associated internal alterations including a lift. Consented 17 May 2004.
- 2004/0881/P – The erection of a single storey rear office extension, together with the relocation of air conditioning units to the rear second floor flat roof area. Approved 17 May 2004.
- 2004/0884/L – The erection of a single storey rear office extension, together with the relocation of air conditioning units to rear flat roof area at second floor level and associated internal alterations including a lift. Consented 17 May 2004.
- 2019/0526/L – Replacement of damaged railings to existing front boundary treatment. Consented 12 March 2019.

Pre-Application Advice

Pre-application advice was sought for a scheme including *'Demolition of rear ground and part first floor extensions; excavation at basement level together with ground and first floor rear office extension, mansard roof extension and associated internal and external alterations'* from Camden Council in late 2015 (LPA ref: 2015/6636/PRE), and following a site visit and meeting a letter of advice was kindly received on 04 March 2016. This advice is summarised below:

- A rear extension and mansard addition would be acceptable in principle given the context of the building.
- The basement and first floor design is acceptable in principle.
- The suggested materials are acceptable in principle.
- Design detail is unacceptable for the following reasons:
 - Top heavy appearance to the rear elevation of the mansard roof extension;
 - Removal of fabric from first floor window opening unnecessary;
 - Loss of visibility of the rear window arrangement;
 - Design does not retain the sense of separation between modern and historic elements; and
 - First floor development is overbearing.

The feedback contained within the letter has been examined and the design reviewed for the present submission to reflect the points arising where relevant.

APPLICATION PROPOSALS

This pre-application meeting request seeks advice on proposals for the replacement of the existing rear extension, internal alterations, and the provision of a mansard roof extension, prior to the submission of a formal application for planning permission and listed building consent.

The proposal seeks to replace the currently outdated and unsuitable accommodation at the rear of the property with a high quality contemporary extension that will enhance the qualities of the listed building whilst providing much needed meeting accommodation to serve the established offices, together with an additional floor of office accommodation.

As such, it is proposed to demolish the current rear extension and to construct a new extension to house a spacious, level access boardroom, which will connect back to the existing doorway in the rear of the building. At roof level, a mansard extension with retained butterfly roof profile is proposed to provide an additional office floor. The extent of the proposed works can be summarised as follows:

Basement

- Modern partition walls from the rear basement room (currently forming walls to the WC and kitchen area), to be removed and reconfigured.
- Opening to be made between the front and rear rooms to form a wide doorway.
- Existing doorway to be blocked and form a wall.
- Existing plant to the basement level retained and refurbished.

Ground Floor

- Existing door wall from hall to front room to be widened, and double door inserted.
- Existing door from stairwell to rear room to be filled in.
- Existing arch between front and rear rooms to have the top of the arch (currently modern recessed infill) removed, to form a fully open arch.

First and Second Floor

Two options are presented for the first and second floor, both of which require the same level of intervention:

- Modern partition walls to be removed from the rear first floor room (currently enclosing WC and

office), and a sliding door inserted.

- A portion of the existing wall between the front and rear rooms to be demolished, to form a square arch, and sliding door inserted.
- A doorway to be inserted into the front room from the stairwell.
- A bathroom 'pod' to be inserted in the front room (with door leading from stairwell).

Third Floor

- Remove existing partition walls.
- Construct new partition walls to form a new toilet and office space.
- Insert new stair to proposed fourth floor within front room.
- Remove existing rear mansard and replace with new mansard wall clad in slate.

Fourth Floor

- Current roof removed, and a mansard created to match those of the adjoining buildings.
- Mansard to consist of a slate butterfly pitch to correspond with the existing roof shape with a pair of sash windows to the front and rear elevations, and new roof lights hidden from view within the central V-form.
- Proposed fourth floor to be accessed via a stair to the front from the third floor.
- Existing lift to be extended and lift over-run located to the inner slope of the butterfly roof.

Rear Extension

- Rear extension proposed to the ground floor.
- Extension to the ground floor to be connected from the existing opening in the rear wall by a glazed atrium.
- Main form of the extension to be set away from the rear of the building with a small courtyard in between, and to extend to the rear wall of the existing yard space.
- Proposed extension to be formed predominantly of glass and timber with a sloping zinc roof, and a further small courtyard and atrium to separate the proposed boardroom area and WC facilities.

The proposed development is outlined in full within both the Pre-Application Document prepared by Damion Marcus Burrows Architects and the Pre-Application Heritage Statement by Palmer Heritage, submitted as part of this pre-application advice, and meeting request.

PLANNING POLICY

National Planning Policy

The National Planning Policy Framework (NPPF), published in February 2019, aims to strengthen local decision making and to reinforce the importance of up to date plans. Paragraph 11 states that 'plans and decisions should apply a presumption in favour of sustainable development.'

For decision-taking this means (Paragraph 11) 'approving development proposals that accord with an up-to-date development plan without delay.'

Paragraph 8 of the NPPF explains that the planning system has three overarching objectives to achieve sustainable development, which are interdependent and need to be pursued in mutually supportive ways:

- An Economic Objective – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A Social Objective – supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- An Environmental Objective – contributing to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Paragraph 80 of the NPPF stipulates that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Paragraph 124 of the NPPF states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

To achieve well-designed places, Paragraph 127 states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). Where the design of a development accords with clear expectations in plan policies, Paragraph 130 states that design should not be used by the decisionmaker as a valid reason to object to development.

Paragraph 192 explains that local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness.

The NPPF recognises that a balance needs to be struck between the preservation of the significance of a heritage asset and delivering public benefit. With regard to designated assets, Paragraph 193 states that the more important the asset, the greater the weight should be on its conservation. Distinction is drawn between those assets of highest significance and those of a lesser significance.

The NPPF identifies harm as being either substantial or less than substantial. Paragraph 195 states that where the proposal would lead to substantial harm to the significance of a designated asset consent should be refused unless the harm or loss is necessary to achieve substantial public benefit that outweighs that harm. In cases where less than substantial harm to the significance of a designated asset is anticipated, Paragraph 196 requires that this harm should be weighed against the public benefits of the proposal. In respect of non-designated assets, Paragraph 197 requires a balanced judgement having regard to the scale of any harm or loss and the significance of the asset.

The London Plan 2021

In March 2021, the Mayor's Spatial Development Strategy for London, known as 'The London Plan', was adopted and provides the overall strategic plan for London, setting out an integrated economic, environmental, transport, and social framework for the development of London over the next 20-25 years.

The following policies from the new London Plan are considered relevant to the proposals:

- Policy GG2 'Making the Best Use of Land' – advises that developments must proactively explore the potential to intensify the use of land to support additional workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- Policy D3 'Optimising Site Capacity through the Design-led Approach' – encourages developments that take into account the current pattern and grain of spaces, scale, proportion and mass of neighbouring buildings, and the historic environment.
- Policy D5 'Inclusive Design' – seeks to achieve the highest standards of accessible and inclusive design, in all new development in London. This is deemed key to ensuring that the built environment is safe, accessible and convenient and enables everyone to access jobs, opportunities and facilities.
- Policy E1 'Offices' – encourages 'improvements to the quality, flexibility and adaptability of office

space of different sizes', which is a central objective of our client.

- Policy HC1 'Heritage Conservation and Growth' – recognises the importance of identifying London's heritage assets and historic environment so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

Local Development Plan

The statutory development plan for the proposal site currently comprises the Camden Local Plan, which was adopted by the Council on 03 July 2017. The Camden Local Plan 2017 sets out the vision for shaping the future of the Borough, and contains policies for guiding planning decisions.

Camden Local Plan (2017)

The following Local Plan policies are considered to be relevant to the consideration of the proposal:

- Policy G1 – Delivery and Location of Growth;
- Policy E1 – Economic Development;
- Policy E2 – Employment Premises and Sites;
- Policy A1 – Managing the Impact of Development;
- Policy D1 – Design; and
- Policy D2 – Heritage.

Policy G1 aims to deliver growth across the Borough, including the provision of 695,000 sq. m of office floor space by 2031, by securing high quality development and promoting efficient use of the land and buildings. The policy also seeks to support development that makes the best use of its site in terms of quality of design, its surroundings, sustainability, amenity, heritage, and transport accessibility.

Policy E1 seeks to secure a strong economy by creating the conditions that encourage economic growth such as supporting businesses of all sizes; maintaining a stock of premises suitable for all businesses, and; supporting and promoting the various clusters of businesses, services and creative industries including the jewellery industry in Hatton Garden.

Similarly, **Policy E2** also seeks to protect employment sites by resisting proposals that include non-business uses. Instead, the Council seeks to 'have a range of sites and premises across the Borough to suit the different needs of businesses for space, location and accessibility'. Development in the Hatton Garden Area encourages jewellery uses and proposals for non-business use will need to include provision for jewellery workshops.

Policy A1 aims to protect the quality of life for all occupiers and residents; and balance this with the needs of the development. Issues to be considered include visual privacy and outlook; sunlight, daylight and overshadowing; and preparation of a construction management plan, as appropriate.

Policy D1 seeks to secure a high quality design for all development that considers the local context and character and, in particular, preserves and enhances any heritage assets. Materials should be sustainable and durable, and of a high quality that complements the local character. In general, the Council welcomes high quality modern design, except where there is a homogenous design, such as a Georgian Squares.

Policy D2 aims to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets including conservation areas and listed buildings. The Council 'will not permit the loss of or substantial harm to' such assets unless it can be demonstrated that the substantial harm will have a significant public benefit. The Council will also not permit development that results in harm that is 'less than substantial to the significance' of the asset without public benefits that outweigh that harm.

In conservation areas, Policy D2 will support applications that preserve, and where possible enhance the character of the area. In respect of Listed Buildings, the Council will resist proposals that include alterations or extensions that 'cause harm to the special architectural and historic interest of the building'; or cause harm

to the significance of a listed building through an effect on its setting. Policy D2 states that remains of archaeological importance will be preserved as appropriate.

Other Material Considerations

Due regard has also been given to the following supplementary planning guidance:

- Camden Planning Guidance: Amenity (January 2021); and
- Camden Planning Guidance: Design (January 2021).

Hatton Garden Conservation Area Appraisal and Management Strategy (August 2017)

The Appraisal confirms that the merit of the Hatton Garden Conservation Area is defined largely by the quality and variety of architecture as well as the unique pattern of streets, which is not limited to one particular period or style, but rather the combination of styles within their own groupings.

Georgian terrace buildings, including those along Ely Place (as specifically mentioned in the Statement), are recognised as making a particular contribution to the character of the Conservation Area with features including simply detailed exposed brickwork, sliding sash windows, flat window arches, slate roofs and front railings to basement light wells.

The Statement also recognises the considerable changes in use of buildings within the Hatton Garden Conservation Area throughout the last few centuries, as the area has transformed into a commercial and retail centre. The Statement explains that some large scale redevelopment has occurred as the result of World War II bomb damage including that to the north and east of Ely Place, however, many of the original plot widths remain the same.

REQUEST FOR PRE-APPLICATION ADVICE

This section briefly outlines the basic principles of the proposed development, and the perceived material considerations of the proposals. Accordingly, we seek the local planning authorities view on the submitted pre-application proposals, in light of the comments made below.

Principle of Development

The principle of replacing the existing rear extension together with the provision of a mansard roof extension should be acceptable to the Council, subject to these being appropriately designed and detailed to ensure that they do not harm the special architectural and historic interest of the Grade II listed building, the character and appearance of the Hatton Garden Conservation Area, or otherwise detrimentally effect the amenity of adjoining occupiers.

Design

The internal changes proposed to 33 Ely Place have been designed to meet the clients' brief for a more flexible and welcoming office space, which would meet the current and future needs of the business who have utilised the building as their headquarters for many years. The principal changes relate to the removal of existing historic fabric to create doorways and openings.

The proposed rear extension at 33 Ely Place is contemporary in design and materially, and spatially 'other' than that of the Georgian terrace to which it belongs. However, its design respects - and seeks to enhance - the qualities of the existing listed building, and has taken into account comments made on the previous pre-application design.

The proposal involves the demolition of the current rear extension, and construction of a new extension to house a spacious, level-access boardroom, which will connect back to the existing doorway in the rear of the building. The proposed extension, though of a different shape, is within the massing envelope of the existing extension, and will retain visibility of the rear façade of the listed building. This will be further enhanced by the position of the extension, which will be set slightly further from the rear façade, and by its materials; which

are considerably less opaque and bulky in form, and will ensure a high level of visibility and light throughout. As such, the proposed rear extension by reason of its height, bulk, siting, mass and design would not be harmful to the special architectural and historic interest of the grade II listed building, and would not be disproportionately large when compared to the size and scale of the listed building.

The mansard extension will replicate the existing butterfly roof form, with a lift overrun from the proposed extension of the existing lift shaft hidden from view within the central V-form. The window sizes suggested will reflect the hierarchy of spaces within the building, and the external pattern of the building, preventing a 'top heavy' appearance. As such, the aim has been to reflect the surrounding mansards within the terrace and present a unified view along the terrace from front and rear. Internally, the spaces created will be flexible and open, with a stair leading from the third to new fourth floor.

The new mansard will infill the gap between the existing high party walls on each side of the listed building. In our opinion, when viewed from the street the mansard infill will be viewed as an improvement. It will appear architecturally in keeping with the rest of the terrace, and will result in a visually coherent street elevation, whilst still retaining the features of the original butterfly roof form such that it would make a positive contribution to the amenity and character of the area.

Local Amenity

The site backs onto the 'De Beers Diamonds' site and is adjacent to other office premises, whilst there are no residential properties in its immediate vicinity. As such, it is considered that the proposed works will cause no undue loss of light, affect privacy through overlooking or otherwise detrimentally affect the amenity of adjoining occupiers, in accordance with Policies A1, D1 and D2 of the Camden Local Plan (2017).

We now turn to consider the principal significance of the site, and to provide a justification for the proposed works, as they relate to the impact on the listed building, and the Hatton Garden Conservation Area.

Heritage

Description of Significance

As set out in the supporting Pre-Application Heritage Statement, the proposal site is of historic interest due to its locality and appearance within the terrace of Ely Place. Ely Place as a whole has remained relatively unchanged in basic form since its original creation in the late 18th Century despite the context of commercial redevelopment throughout the Holborn area. Therefore, the significance of 33 Ely Place is primarily related to the context and setting to the front of the building, and the quality and architecture of the main elevation. The interior of the building also contributes to this significance, due both to its original and replacement features, and its relatively unchanged plan form. The current rear extension detracts from the listed building, as a whole, due to its poor architectural quality, although the surrounding setting to the rear is equally poor due to later surrounding development.

Impact on Heritage Assets

Roof Extension

As set out above, the main front elevation of 33 Ely Place makes the greatest contribution to its significance. It is not intended to alter the front façade of the building beyond the addition of the mansard set back behind the existing parapet, which will retain its consistency with the townscape of Ely Place and the listed terrace. However, there will be a change to the roof of the building. As set out at Paragraph 6.29 of the Pre-Application Heritage Statement, the proposed mansard roof has been designed to blend with the adjoining mansard extensions, and to reflect the fenestration of the host building by showing a pair of small sash windows. Traditional materials will be used, for instance slate and timber framed windows, in recognition of the guidelines within the Hatton Garden Conservation Area Statement. The aspiration is to ensure that the extension has minimal impact on the listed building or its surroundings and this will be achieved by the proportions of the proposed mansard in relation to its neighbours. Due to the sensitivity of the proposed materials, and the presence of surrounding mansards, it is considered that this element of the works will not have a harmful impact on the heritage asset.

The Pre-Application Heritage Statement continues at Paragraph 6.30 in that the upper storeys of 33 Ely Place have been rebuilt at some point in the late 19th or early 20th Century. As such, it is not clear whether the existing roof is original to the building; it is probable that a new roof was inserted, or at least that the roof was largely altered, at the time of rebuilding. However, the butterfly profile of the roof is likely to be the only one remaining in the listed terrace, and therefore, this shape is considered to retain some significance, even if its structural members are no longer original or of any great age. Accordingly, the Pre-Application Heritage Statement continues that the design retains the profile of the butterfly roof, whilst extending the roof space by one storey in a mansard style. As the butterfly profile is retained, and the roof members are unlikely to be original to the building, the impact of these works are not considered to detract from the significance of the listed building, or to harm the character and appearance of the conservation area.

To the rear, due to the difference in height of the brick elevations front and back, the mansard will show two levels of windows (currently there is a single level of attic windows). As such, and as set out at Paragraph 6.31 of the Pre-Application Heritage Statement, it is intended that these windows are in sympathetic traditional style. Notwithstanding, the Pre-Application Heritage Statement continues that it should be noted that this roof scape is not visible from the wider conservation area or adjacent listed buildings, and can only be viewed from the rear windows of modern office blocks and their service yards. Due to this lack of visual prominence, it is not considered that this element of the works will harm the character and appearance of the conservation area. In addition, the change to the listed building will not detract from its architectural significance, and therefore the Pre-Application Heritage Statement considers that there will be no harm to the heritage asset resulting from the works.

It is also proposed to house a lift overrun to the inner slopes of the butterfly roof, alongside roof lights. As set out at Paragraph 6.32 of the Pre-Application Heritage Statement, these would not be visible from the wider conservation area, and would not detract from the legibility of the listed building itself.

As stated at Paragraph 6.33 of the Pre-Application Heritage Statement, the suggested roof extension works have been designed to be similar in form and impact to that approved by the London Borough of Camden in 2004 (LPA ref: 2004/0877/P and 2004/0879/L).

Internal Works

Whilst it is recognised at Paragraph 6.34 of the Pre-Application Heritage Statement that the proposed internal changes will reduce the extent of historic fabric where it exists, the design proposed has sought to retain the legibility of the existing plan form by the use of stub walls and the insertion of sliding partitions. To the ground floor, the widening of the doorway from the hall to the front room will retain the sense of the original arrival and access, whilst allowing a more welcoming flow through the building for the client and their visitors. This doorway will be formed to match the existing pattern, surround and style. The removal of modern infill to the head of the arch between the front and rear room of the ground floor is not considered to cause any change in the legibility of the floor plan. Where new doors are proposed to the upper floors from stairwell areas, these will be in keeping with the surrounding material palette, and it is considered that doors from the stair are sympathetic to the general use of the building and original purpose of the stairwell.

As set out at Paragraph 6.35 of the Pre-Application Heritage Statement, it is also intended to remove modern partition walls in areas of the interior of the listed building, and to reinstate these in different positions. The partitions date from the latest conversion to office accommodation (late 1980s – 1990s), and make no contribution to the significance of the listed building. The partitions will be removed and reinstated according to an agreed methodology to ensure that no further damage to significant features occurs.

The insertion of a new stair to facilitate access from the third to new fourth floors of the building has been positioned away from the existing stairwell to reduce the need for major works to the existing stair, and to separate old and new in a legible way. As explained at Paragraph 6.36 of the Pre-Application Heritage Statement, the position of the stair, though near to the upper floor windows, will not be highly visible from the front of the building due to its openness.

In general, the Pre-Application Heritage Statement considers at Paragraph 6.37 that the internal proposals do constitute some harm to the listed building, due to the removal of what is thought to be historic fabric. However, the overall character, appearance and value of the building is retained through common design

measures, and the legibility of the historic building and its plan form will remain.

Rear Extension

The Pre-Application Heritage Statement (at Paragraph 6.38) recognises that the current rear extension is of poor quality, and that it occupies almost the whole of the rear yard of 33 Ely Place, albeit a tokenistic attempt to suggest outside space and separation has been made in the provision of a small courtyard of no more than a metre in depth directly adjoining the rear wall of the listed building. This space is considered to be unusable and dark. Furthermore, it is considered that the demolition of the rear extension will not harm the character and appearance of the listed building or the conservation area, and its removal will not disturb historic material.

As noted at Paragraph 6.39 of the Pre-Application Heritage Statement, an iterative process has been used to reach the design of a contemporary replacement scheme for the rear extension, which respects the form and legibility of the listed building whilst providing additional space for a growing company who wish to continue to use their building.

The Pre-Application Heritage Statement continues that the form of the proposed extension has been chosen in recognition of the need to retain visibility and legibility of the pattern of windows to the rear façade of Ely Place, and is within the confines of the existing mass of the current extension. There will be considerable improvements to this legibility through the use of transparent and light materials, and the positioning of the extension. It is considered that this part of the proposal does not cause harm to the listed building, and does in fact present a higher quality and more sympathetic solution than the existing extension.

Clearly the form and materials of the proposed extension are very different in style to those of the listed building. This design philosophy allows the modern to be read in contrast to the historic, and displays an honesty of built form which could not be achieved with a 'pastiche' design. In this way, the Pre-Application Heritage Statement considers at Paragraph 6.41 that the proposals are in accordance with the prevailing philosophies of conservation.

Summary

In summary, the Pre-Application Heritage Statement confirms that the works proposed to 33 Ely Place require alteration to original internal fabric, however the proposed roof extension replicates historic replacement or alteration achieved elsewhere in the listed terrace. The proposed rear extension will replace an existing extension of poor quality with one of high quality design, using sensitive and appropriate materials and proportions, increasing the perception of separation and allowing a greater visual appreciation of the rear elevations of the historic building.

Accordingly, it is concluded that:

- There will be less than substantial harm to the special architectural and historic interest of the heritage asset as set out in the NPPF, although improvements will also be made and therefore the enhancement of the listed building will provide a benefit through its increased viability and legibility, as well as potential for continued enjoyment and use by future generations.
- The proposed design adheres to Local Plan Policy D2, in that it 'preserves and enhances' the asset, and does not harm the contribution made by setting to the special interest of the asset.
- The character and appearance of the Hatton Garden Conservation Area will not be harmed.

It is also considered that the proposed works will allow the current owners of the building to continue their occupancy as their company grows, securing the use and maintenance of the building for the foreseeable future, and contributing to the success of Camden as a diverse and attractive location for business.

PUBLIC/POLITICAL ENGAGEMENT

We seek advice from the Council, on the form of public and/or political engagement for the scale of

development proposed.

APPLICATION DOCUMENTS

We also seek confirmation on the prerequisite list of documents required to validate a planning and listed building consent submission for the proposed development, from the Council.

CONCLUSIONS

In light of the above, we consider that the proposals are fully in compliance with planning policy. However, we seek a pre-application meeting and written advice on the merits of the proposal from a Planning and Conservation Officer, prior to the submission of a formal application for planning permission and listed building consent.

We trust that the information supplied is sufficient for you to consider our pre-application request in advance of any forthcoming meeting. However, should you have any questions or queries in the meantime or require any further information, please do not hesitate to contact us.

Yours sincerely,



Claire Day BSc (Hons) MRICS MRTPI
DIRECTOR

Encs.



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www.camden.gov.uk/planning

Date: 24/09/2021
Our ref: 2021/2625/PRE
Contact: Nora-Andreea Constantinescu
Direct line: 020 7974 6253
Email: nora-andreea.constantinescu@camden.gov.uk

Dear Claire Day,

Re: 33 Ely Place, EC1N 6TD

Thank you for submitting a pre-planning application enquiry for the above property which was received on 24/05/2021 together with the payment of £2,362.00 which was received on 28/06/2021. Planning and conservation officers visited the property on 01/09/2021. The advice is based on the site visit findings, desktop assessment and information provided by the applicant.

Development Description

Replacement of existing rear extension, removal of existing M shaped roof and erection of new mansard roof extension with double set of dormers to the rear and internal alterations at all floors to listed building.

Planning History

Previous relevant records at the application site:

9000026 (9070012) – The demolition and rebuilding of the rear ground floor extension and internal alterations - Granted 10 July 1990

2003/0160/P (2003/0164/L) – The erection of a mansard roof and a two storey rear office extension together with the reinstatement of existing air conditioning units on the first floor flat roof area. - **Refused 22 October 2003.**

RfR: *The proposed two storey rear extension, by reason of its height, bulk, mass, siting and design would fail to preserve or enhance the character and appearance of the Hatton Garden CA.*

RfR: *The proposed mansard roof extension would result in the loss of original historic fabric and roof structure of the building. This would be harmful to the integrity of the property and to the special architectural and historic interest of the Grade II listed building.*

2004/0877/P (2004/0879/L) – The erection of a mansard roof extension to create additional office space. - **Granted 17 May 2004.**

2004/0881/P (2004/0884/L) – The erection of a single storey rear office extension, together with the relocation of air conditioning units to the rear second floor flat roof area. - Granted 17 May 2004.

Site description

Ely Place, off Charterhouse Street, is a relatively quiet and isolated cul-de-sac within the Hatton Garden Conservation Area. The street consists of a terrace of basement plus four-storey Georgian terrace houses laid out by Mr Charles Cole (architect and surveyor), in circa. 1773. The street is gated with a porter lodge at its junction with Charterhouse Street. Number 33 is a grade II listed Georgian town house forming part of a terrace on the east side of Ely Place, which is currently used as office accommodation.

The listed building description, as added to the National Heritage List in May 1974, relates to the proposal site as part of the wider set of terraced properties. The relevant text of the listing states:

“9 terraced houses. c1773; Nos 26-30 rebuilt C20 in facsimile, Nos 31-34 restored top floors. Yellow stock brick; Nos 26-30 multi-coloured stock brick. Nos 30-33 with stone band at 1st floor. 4 storeys and basements; Nos 26-30 with attics and dormers. 3 windows each. Wood doorcases with Corinthian three quarter columns (No.34 with pilasters), fluted friezes with roundels and dentil cornices. Patterned fanlights. No.29 with service entrance in place of ground floor windows. Gauged brick flat arches (Nos 31-34 brown brick) to recessed sash windows, some with glazing bars. No.34 ground floor windows with stone architraved surround. Parapets. INTERIORS: not inspected. SUBSIDIARY FEATURES: attached cast-iron railings to areas”.

Assessment

The main issues for consideration are:

- Land use
- Design and Heritage
- Impact on amenity
- Transport

Land use

The application building is currently an office (Class E), and the proposal would maintain this existing use, with an extension of additional 36sqm of office floor space. In line with policies E1 and E2, the proposed provision of employment space, in central London would be supported.

Design and Heritage

Policies D1 and D2 are relevant. The building is Grade II listed, and a detailed heritage statement would be required at application stage.

The pre-application site is a grade-II-listed terraced house of 1773 making a positive contribution to the Hatton Garden Conservation Area. While the upper two storeys appear to have been repointed, historic photos show this work to have occurred prior to the second world war, so not to be related to supposed bomb damage.

Roof extension

- It is proposed to remove the existing M shaped roof and erect a new mansard type extension with a similar M shaped roof and double set of dormers to the rear and create a mezzanine space internally. The existing M shaped roof is one of the last to remain within this terrace row, and officers consider this gives it additional importance as an indicator of how the original terrace would have looked.
- Based on the current information it is not certain that the internal materials of the roof fabric are not original, even if they are somewhat altered. This building is known to have been largely intact in 1944, after the Blitz had ended on 15 September 1941. Any later damage would have had to have been caused by a V-weapon (1944-5), and none is shown in the bomb map. As such, the proposed loss of original M shaped roof and potential historic fabric, would result in harm to the listed building and to the group as a whole.
- The proposed extension would have a mansard type appearance at the front with two dormers aligned with the windows below and at the rear a double set of dormers which is an atypical type of extension. The design of the mansard does try to replicate the M shape roof, however, this is not considered to outweigh the harm from the loss of the existing roof structure. Whilst it is noted that adjacent buildings within the terrace have been built with a similar structure, for the reasons highlighted above, this would not be acceptable in this instance.
- Officers are aware of the permission granted in 2004, however based on most recent case law, considerable importance and weight has to be given to the desirability of preserving heritage assets, where preserving means doing no harm (See *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council*, 2014).

Rear extension

- The site already has a part lower ground floor level/part above ground level rear extension across the whole site, with a small lightwell closer to the building's rear elevation. The proposal involves the demolition of this existing structure and erection of a new single storey rear extension. The existing rear extension does not hold particular architectural value and therefore its demolition would be acceptable.
- The new proposed extension appears appropriate for the site in terms of scale and proportions, and it is carefully considered in its context. It would improve the current relationship with the rear elevation of the host building which is supported.
- In terms of detailed design, the extension appears of high quality, however in the event of a future planning application, further details would be required to demonstrate how it is linked with the historic fabric of the rear elevation, boundary walls, and the general detailing of the glazed structures within it.
- Importantly, the roof of the existing rear extension hosts plant equipment, and this can be seen as a feature across the terrace. It is understood that the proposal would lead to a full refurbishment of the building and therefore new plant would most likely be proposed. You are advised to consider this crucial element within the design of the proposed extension, and avoid this being an afterthought in the design process.
- The proposal includes two courtyards which, with greenery, could improve the quality of the space and also the biodiversity of the site. You are advised to consult an arboricultural specialist to advise on the type of plants and trees which would be able to grow in such enclosures with limited amount of daylight.

Internal alterations

- The building is lit with harmful recessed spotlights. These are unlikely to be lawful and should be removed and replaced with external pendant or wall-mounted lighting as part of any future planning application.
- Ground floor:
 - The front room is of particular importance for the listed building and therefore the large opening from the entrance hallway would result in harm to the historic plan form and would not be supported.
 - Removal of double doors and retention of nibs should be acceptable.
 - Door to rear room fixed shut should be acceptable.
 - Any glazed partition to the rear room should not sit on the blocked door.
- First floor and second floor:
 - Removal of spine walls and introduction of large structures of cabinetry to house blocks of folding door is harmful to the plan form and historic fabric. You are advised to retain part of the spine walls and nibs and introduce double doors.
 - Removal of secondary walls to rear room and combining of front and rear rooms is harmful to the plan form and historic fabric. You are advised to retain part of the walls and nibs and introduce double doors.
 - Intrusion into front rooms of subsidiary rooms (toilets) is harmful in plan form and possibly to the historic fabric also. You are advised to remove this element of the proposal in the event of future planning application.
- Third floor:
 - Full loss of spine wall is harmful to the plan form and historic fabric. The proposed staircase and double-height space would be harmful to the plan form. You are advised to retain part of the spine wall and nibs and introduce double doors.
- The only acceptable changes are at basement level.
- Overall, the proposed internal alterations would result in harm to the listed building, which is not outweighed by any public benefits.

Amenity

- The proposed roof extension and internal alterations due to their nature and projection are unlikely to result in harm to the neighbouring amenity.
- The proposed rear extension would not project higher than the existing boundary walls, so no harmful overlooking, loss of light, or outlook would occur.
- The proposal does increase the amount of glazing on the roof and courtyards, which could potentially result in additional light spill. Given the commercial nature of the application site and adjacent ones is not considered that this would result in significant harm.
- In the event of a future planning application, formal consultation would take place and any comments from neighbouring occupiers would be taken into account when coming to a decision.

Transport

- You should consult with the organisation who manages Ely Place to ensure construction vehicles could turn and park on Ely Place. Camden Transport officers would not require a Construction Management Plan (CMP) for this proposal.
- The development would be required to provide 4 long-stay parking spaces. Given the special architectural merit of the listed building there are limited opportunities for cycle parking to be installed within the building. It is therefore possible that in the event of a future planning application, a financial contribution would be required to provide cycle parking stands on Ely Place, or in vicinity.

Other matters

We are legally required to consult on applications with individuals who may be affected by the proposals. We notify neighbours by displaying a notice on or near the site and placing an advert in the local press. We must allow 23 days from the consultation start date for responses to be received. We encourage you to engage with the occupiers of adjoining properties before any formal submission.

Recommendations

Overall, the proposed development in its current form would not be supported in the event of a future planning application. It is considered to result in the top-end of less than substantial harm for the following reasons:

- Loss of last remaining and potentially original M shaped roof within the terrace row.
- Proposed mansard extension with double set of dormers to the rear would be considered harmful to the listed building.
- Internal alterations at ground and upper floors would result in harm to the historic plan form and fabric.
- Insertion of staircase and double space at third and fourth floors is harmful to the historic plan form.
- The proposed replacement rear extension should be acceptable subject to further details in relation to method of attachment to listed building, glazed elements, plant equipment.

Please see appendix 1 for supplementary information and relevant policies.

If you have any queries about the above letter or the attached document please do not hesitate to contact Nora Constantinescu (0207 974 5758)

Please Note: This document represents an initial informal officer view of your proposal 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.

Thank you for using Camden's pre-application advice service; I trust this is of assistance in progressing your proposal.

Yours sincerely,

Nora Constantinescu

Senior Planning Officer
Planning Solutions Team

Appendix 1:

Relevant policies and guidance:

- **National Planning Policy Framework 2021**
- **London Plan 2021**
- **Camden Local Plan 2017**
 - Policy DM1 Delivery and monitoring
 - Policy A1 Managing the impact of development
 - Policy A3 Biodiversity
 - Policy A4 Noise and vibration
 - Policy E1 Economic development
 - Policy E2 Employment premises and sites
 - Policy D1 Design
 - Policy D2 Heritage
 - Policy CC1 Climate change mitigation
 - Policy CC2 Adapting to climate change
- **Camden Supplementary Guidance 2021**
 - CPG – Design
 - CPG – Amenity
 - CPG – Energy efficiency and adaptation
 - CPG – Biodiversity
- **Hatton Garden Conservation Area Appraisal 2017**

Planning application information:

The following documents should be included with the submission of a full planning application:

- Completed full planning application form and listed building consent
- The appropriate fee
- Location Plan (scale 1:1250)
- Site Plan (scale 1:200)
- Floor plans (scale 1:50) labelled 'existing' and 'proposed'
- Elevations and sections (scale 1:50) labelled 'existing' and 'proposed'
- Section drawings (scale 1:50) labelled 'existing' and 'proposed'
- Demolition drawings (scale 1:50)
- Design and Access and Statement
- Heritage Statement

In addition to the above, the following elements/details should be included within any formal application:

- Service routes and risers to show change and any impact upon historic fabric
- Cornice, skirting details
- Details of ceilings repairs if any
- Flooring details
- Build up plan for flooring (if required)
- Details of all new materials – including samples
- Full details of fireplaces
- Joinery for new door and new windows
- Details of window screens or secondary glazing (if required)

More about supporting information for planning applications [here](#).