

Delegated Report		Analysis sheet		Expiry Date:		25/01/2022	
		N/A		Consultation Expiry Date:		02/01/2022	
Officer				Application Number(s)			
Miriam Baptist				1) 2021/4974/P 2) 2021/5868/L			
Application Address				Drawing Numbers			
Flat C 13 Northington Street London WC1N 2NT				See decision notice			
PO 3/4		Area Team Signature		C&UD		Authorised Officer Signature	
Proposal(s)							
1) Insertion of rooflights to front and rear roof slopes and installation of external air conditioning condenser unit at roof level. 2) Insertion of rooflights to front and rear roof slopes, installation of external air conditioning condenser unit at roof level, and installation of secondary glazing to windows.							
Recommendation(s):		1. Refuse Planning Permission 2. Refuse Listed Building Consent					
Application Types:		1. Full Planning Permission 2. Listed Building Consent					

Conditions or Reasons for Refusal:	Refer to Decision Notice					
Informatives:						
Consultations						
Adjoining Occupiers:	No. notified	00	No. of responses	00	No. of objections	00
Summary of consultation responses:	<p>Site notices were displayed outside 13 Northington Street and outside 30 John Street from 03/12/2021 (expiring 27/12/2021). The application was also advertised in the local press from the 09/12/2021 (expiring 02/01/2022).</p> <p>No objections or comments were received from adjoining occupiers.</p>					
Bloomsbury Conservation Area Advisory Committee	<p>The Bloomsbury CAAC objected on the following grounds:</p> <p>While we have no objection in principle to internal secondary glazing the product chosen seems of a much bulkier section than many other products on the market. This may be because the opening requirements (up and over/twist/turn etc) are over-ambitious. A simple sliding sash arrangement can be much slimmer and less visible from the exterior. So we object on the basis that the glazing system proposed is too bulky.</p> <p>The two conservation style rooflights again are acceptable in principle but should be of matching size to help preserve the harmony of the roof plan.</p> <p>For reasons of energy conservation air conditioning should generally be resisted except in special circumstances. If these pertain here then the position of the air-conditioning condenser is acceptable providing it is not visible from anywhere in the public realm and this could not be verified in the information submitted. If there are no special circumstances then the installation of air conditioning is objected to.</p>					

Site Description

Northington Street is located within the Bloomsbury Conservation Area and boasts a number of listed buildings, of which the application site is one.

The application site is on the corner of Northington Street and John's Mews and was built in 1903 as brewery stables. The building was listed Grade II on 11 January 1999 and has now been subdivided and converted to residential and other uses.

Relevant Planning History

No relevant planning history.

Relevant policies

The National Planning Policy Framework 2021

The London Plan 2021

Camden Local Plan 2017

- A1 Managing the impact of development
- D1 Design
- D2 Heritage
- CC1 Climate change mitigation
- CC2 Climate change adaptation measures

Supplementary Guidance - Camden Planning Guidance

- Amenity (2021) – Sections 2 (Overlooking, privacy and outlook), 6 (Noise and vibration).
Design (2021) – Sections 5.13 - 5.14 (Roofs: General Principles), 9.22 - 9.26 (Air-conditioning and renewable energy).
- Energy efficiency and adaptation (2021) – Sections 2 (Energy Hierarchy), 3 (Making Buildings more Efficient), 8 (Energy Efficiency in Existing Buildings).
- Home improvements (2021) – Sections 3.5 (Rooflights), Sustainability: Cooling and Air Conditioning Units.

Bloomsbury Conservation Area Statement (2011)

Assessment

1 Proposed Development

1.1 Planning permission and listed building consent are sought for the following:

- Insertion of rooflights to the front and rear roof slopes, the installation of external air conditioning condenser unit at roof level, and installation of secondary glazing to windows.

2 Assessment

2.1 The principal consideration in the determination of this application relates to:

- Design and heritage (The impact of the proposal to the special character and appearance of the Grade II Listed Building and the Bloomsbury Conservation Area);
- Energy and sustainability;
- Neighbouring residential amenity.

3 Design and Heritage

- 3.1 No 13 Northington Street is a Grade II listed building, as is the adjacent terrace of properties to the rear, Nos.29-36 John's Street, and the terrace of properties diagonally opposite, Nos.22-28 John's Street. The Council has a statutory duty to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses, under sections 16 and 66 of The Planning (Listed Buildings and Conservation Areas Act) 1990 (as amended).
- 3.2 The application site is located within the Bloomsbury Conservation Area, wherein the Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area, in accordance with Section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).
- 3.3 Local Plan policies D1 (Design) and D2 (Heritage) are aimed at achieving the highest standard of design in all developments. Policy D1 requires development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.
- 3.4 The CPG Home Improvements states the following in regard to rooflights:
- (a) *They should not protrude more than 0.15m beyond the plane of the roof slope or be flush with the roof slope for properties in Conservation Area;*
 - (b) *They are significantly subordinate both in size and number to the roof slope being altered and roof form overall;*
 - (c) *Their position should take into account other architectural roof elements, e.g. gables, chimneys, turrets;*
 - (d) *Their position and dimensions should ensure a consistent rhythm with other rooflights on adjacent/neighbouring roofs.*
- Although helpful, it is noted that the CPG does not provide any further guidance in relation to listed buildings, which need a higher level of care and attention. It does not however that *'the texture, colour, pattern and finish of materials (detailing) should relate well to the existing character and appearance of both the existing home and the wider area, particularly in Conservation Areas and listed buildings.'*
- 3.5 The CPG Design states that rooflights, additional storeys, mansards, and other roof alterations are likely to be acceptable where:
- (a) *'Good quality materials and details are used and the visual prominence, scale and bulk would be appropriate having regard to the local context;*
 - (b) *There is an established form of roof addition or alteration to a group of similar buildings and where continuing the pattern of development would be a positive design solution, e.g. helping to reunite a group of buildings or townscape;*
 - (c) *Alterations are architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form.*
- 3.6 The CPG Home Improvements highlights that air conditioning units are discouraged by the Council, in line with Policy CC2 and guidance in CPG Energy Efficiency and adaptation and suggests a range of passive cooling measures that should be considered before cooling options which rely on an energy source.
- 3.7 The CPG Design also states that *'active cooling (air conditioning) will only be permitted where dynamic thermal modelling demonstrates that there is clear need for it and after other measures have been considered.'* It highlights that *'air-conditioning units can cause significant visual blight and*

their location should be carefully considered to minimise their visual impact, in accordance with the above guidance on design, conservation areas and listed buildings, and amenity.'

- 3.8 The building, which is listed and therefore of national architectural significance, was built as a stable block and although has now been converted to other uses, the changes to which the building is subjected should be commensurate with and sympathetic to both its standing as a stable building as well as a structure of national architectural significance. To date the building's external envelope has been retained without undue alteration.

Significance of No 25 John's Mews

- 3.9 Historic England's listing description notes: *"Includes: No.25 JOHN'S MEWS. Brewery stables, now offices and workshop. Dated 1903. Built for Henry Finch; altered internally late C20. Red brick with stone quoins and dressings. 2 storeys. Main facade to Northington Street has 5 windows; 5 window right hand return with vehicle entrance. Ground floor to left has paired elliptical arched vehicle entrances with keystones and cornices to pillars. To right, a flat arched doorway, a vehicle entrance and then 3 segmental-arched windows, that nearest the vehicle entrance being half-size. Projecting moulded brick cornice at 1st floor and parapet level; 1st floor casements set in stone surrounds forming strips. Deep parapet of segmental-headed sections flanked by tall tapering brick chimneys supported by stone consoles to front and sides and having stone cornices. Angles have smaller stone tapering chimneys on dies. INTERIORS retain some original features. SUBSIDIARY FEATURES: quoin to Northington Street inscribed "These premises were erected by Henry Finch Esq., JP in AD 1903"; on the return "and this stone laid by H. Finch Rober August 10th 1903".*

The proposal

- 3.10 The proposal is for the introduction of rooflights to front and rear roof slopes, the installation of an external air conditioning condenser unit at roof level, and installation of secondary glazing to windows.
- 3.11 The proposed conservation style rooflights are considered acceptable in design terms, although it is acknowledged that matching opposing rooflights on each roof slope, as suggested by the CAAC, would be preferable to preserve the harmony of the roof plan. The applicant has indicated that in the future the loft space may be used as a habitable room. The rooflights would not be visible from the public realm and would appear almost flush with the roof. The rooflights would be acceptable from a design and heritage perspective, preserving the special character of the building and character of the conservation area.
- 3.12 The proposed secondary glazing is considered acceptable, as the proposals seek to improve the energy efficiency of the building while retaining the original windows. The secondary glazing is not considered to be unduly noticeable from the exterior, although the conservation group have expressed concern that the units selected may be more noticeable than ones designed differently that are subsequently slimmer.
- 3.13 The applicant has not provided sufficient evidence to demonstrate that the installation of an air-conditioning unit on the roof would not harm the historic fabric of the listed building, or to demonstrate that the unit would be located discretely in order to cause no harm to the appearance of the listed building, the setting of the surrounding listed buildings and the conservation area. The varied height of the building's parapet, and lower parapet wall facing No 29 John Street which is widely visible from the public realm on Northington Street, means the proposed unit may be visible from the public realm. Information which has not been provided includes:
- (a) Drawings showing where the unit would be located on the roof and its height in relation to the parapet;

(b) Details of installation and assessment of the impact of the AC unit on the grade II listed building.

- 3.14 The Bloomsbury Conservation Area Appraisal and Management Strategy states that '*alterations and extensions can have a detrimental impact either cumulatively or individually on the character and appearance of the area*' and highlights '*addition of prominent roof level plant/ fire escapes that detract from both the building and character and appearance of the area*' as an example in the area.
- 3.15 The proposed air conditioning unit would be located in a potentially prominent position at roof level as seen from the streetscene and neighbouring listed properties. It would sit within an acoustic enclosure made of wood, which would further add to the bulk of the structure and its visibility. It may harm the appearance of the host building and character of the area, due to its bulk and location with clear view from the street and from surrounding taller buildings, including from adjacent Grade II listed properties Nos 29 and 30 John Street, such that the impact of its appearance is significant. As the building is fronting the street, the views of the plant unit would be further exacerbated. It is unclear whether the A/C service pipes would be concealed and therefore they may also add visual clutter.
- 3.16 Figure 3 of the Design and Access / Planning / Heritage Statement shows an approximate location for the AC unit indicated on a photograph by an arrow. This is the only information received with regards to the location of the proposed AC unit. Without more specific information a proper assessment cannot be made. However, there is clearly a potential in this location, and with the nature of the plant and its utilitarian appearance, for the alterations to result in harm to the listed building and conservation area.

4 Energy and Sustainability

- 4.1 Because the application is for active cooling, as per policy CC2 and the Energy Efficiency and Adaption CPG, schemes are required to demonstrate that other adequate measures have been considered and modelled before active cooling. In accordance with policy CC2 of the Local Plan, the Council discourages active cooling. Using active cooling systems increases energy consumption and carbon emissions contrary to the aims and objectives of policy CC1. As a result, air-conditioning units are only permitted where thermal modelling demonstrates that there is a clear need for it after all preferred measures are incorporated in line with the London Plan cooling hierarchy. In addition, passive measures should be considered first. If active cooling is unavoidable, applicants need to identify the cooling requirement and provide details of the efficiency of the system.
- 4.2 The applicant has not provided sufficient evidence to demonstrate that all preferred measures within the cooling hierarchy have been reviewed against the criterion (as required by *CPG Energy Efficiency and adaptation*) and incorporated into the host building. The applicant has not provided a thermal modelling or overheating analysis to demonstrate that there is a clear need for the proposed units. Due to the lack of the above-mentioned information, the Council cannot be satisfied that the proposed works are necessary and that appropriate climate adaptation measures to reduce the impact of urban and dwelling overheating could not be achieved by other preferred measures as set out in the cooling hierarchy. The proposal is therefore contrary to policy CC1 (Climate change mitigation) and policy CC2 (Climate change adaptation measures) of the Camden Local Plan 2017 and advice in the Energy Efficiency and Adaption CPG.
- 4.3 It is noted that the application includes the addition of rooflights which is likely to exacerbate any current overheating or temperature fluctuation experienced within the property, and therefore increase the need for cooling. For this reason, use of glazing with a G value of 0.4 has been advised.
- 4.4 It is noted that there is an existing air-conditioning unit on the roof of the adjacent No 25 St John's Mews, of which the relocation was recently approved under planning ref 2022/1681/P. The

application regarded an existing unit and therefore was not subject to the same evidence requirement as necessary for the consideration of a new air-conditioning unit.

5 Residential Amenity

- 5.1 Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The policy notes that the factors to consider include: visual privacy and outlook; sunlight, daylight and overshadowing; artificial lighting levels; impacts of the construction phase; and noise and vibration. Policy A4 also seeks to ensure that noise and vibration is controlled and managed.
- 5.2 An acoustic assessment for the proposed AC unit was submitted with the application. The nearest sensitive receiver has been identified as a residential window located approximately 7 meters away. Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, Camden's Local Plan criteria and BS 4142:2014. The plant noise criteria is considered to have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building. Therefore, the proposed unit would not be considered to have a harmful impact on the amenity of neighbouring residential properties in terms of noise and disturbance. Whilst the acoustic enclosure would overcome amenity concerns in terms of noise impact, it is noted that it would be unacceptable in design and heritage terms as aforementioned in the Design and Heritage section above.
- 5.3 The proposed rooflights are not considered to present any material harm in terms of overlooking or loss of privacy to the surrounding properties. Although the roof is sloped the rooflights will be looking upwards rather than across and are intended to bring in natural light rather than create a view.
- 5.4 Overall, the proposal is not considered to give rise to any adverse impacts on neighbouring residential amenity.

6 Conclusion

- 6.1 The proposal has failed to justify the need for active cooling by reducing and mitigating the impact of dwelling overheating through the application of the cooling hierarchy, thereby failing to minimise carbon dioxide emissions, contrary to policies CC1 (Climate change mitigation) and CC2 (Climate change adaptation measures) of the Camden Local Plan 2017. In addition to this, the absence of detailed drawings showing the location and design of the proposed AC unit and associated acoustic enclosure, it has not been adequately demonstrated that the new AC unit and acoustic enclosure would not harm the special architectural and historic significance of the host and neighbouring Grade II listed buildings and the character and appearance of the Bloomsbury Conservation Area, contrary to Policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017.

7 Recommendations

- 7.1 Refuse Planning Permission
- 7.2 Refuse Listed Building Consent