

## Appeal Statement

2A Gate Street, London, WC2A 3HP

**Firstplan Ref:** 21474/KM

**Date:** May 2023

# Contents

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Section 1	Introduction .....	5
Section 2	Background Information .....	7
Section 3	Appeal Proposals.....	11
Section 4	Planning Policy Summary.....	12
Section 5	Assessment of the Council’s Reasons for Refusal.....	15
Section 6	Conclusions .....	22

## Appendices

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Appendix 1 Photographs of Site and Surrounding Area

Appendix 2 Appeal decision for 4A Gate Street

Appendix 3 Pre-Application Advice received prior to submission

Appendix 4 Schedule of Neighbouring Listed Buildings

Appendix 5 Proposed Street Scene

Appendix 6 Examples of Internal Heat Pumps and roof vents

Appendix 7 Revised plan to show location of internal air source heat pump and roof vent

# Section 1 Introduction

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1.1 This Appeal Statement of Case has been prepared by Firstplan, on behalf of our clients, Peak Group London Ltd. and presents the case for planning permission to be granted in respect of planning application reference 2022/1065/P at 2A Gate Street, London, WC2A 3HP.

1.2 The application sought permission for:

**“Erection of an additional storey at fourth floor level (following removal of the roof) and erection of a mansard roof extension to create a new one bedroom self-contained flat (Class C3) with external roof terrace and privacy screen, green roof and alterations to windows on front elevation at third floor.”**

1.3 The decision notice was issued by London Borough of Camden on 29<sup>th</sup> November 2022. The application was refused for the following reasons:

- 1. The proposed 4th floor and mansard roof extension, by reason of their proposed height, bulk and detailed design, would compromise the form, character and appearance of the host building, streetscene and this part of the Bloomsbury Conservation Area and would harm the setting of the listed buildings fronting Lincoln's Inn Fields, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.**
- 2. The proposed development would not achieve required carbon reduction targets and as such would not minimise the effects of climate change or meet the highest feasible environmental standards, contrary to policies CC1 (Climate change mitigation) and CC2 (Adapting to climate change) of the London Borough of Camden Local Plan 2017.**
- 3. The proposed development, in the absence of a legal agreement securing car-free housing, would be likely to contribute unacceptably to parking stress and congestion in the surrounding area and fail to promote more sustainable and efficient forms of transport and active lifestyles, contrary to policies T2 (Parking**

and car-free development) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.

4. **The proposed development, in the absence of a legal agreement securing a financial contribution towards an off-site cycle parking space, would not provide an accessible, secure cycle parking facility and would fail to promote more sustainable and efficient forms of transport and active lifestyles, contrary to policies T1 (Prioritising walking, cycling and public transport) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.**

- 1.4 The key issues to be considered in this appeal are: whether the proposed development has an acceptable impact on the character and appearance of the host building, the wider street scene and the conservation area; whether the proposals are acceptable in relation to the minimising the impact on climate change; and the provision of a unilateral undertaking for car free development and a financial contribution towards off-site cycle parking.
- 1.5 The Statement of Case assumes the following structure: Section 2 presents the relevant background information including the planning history of the site; Section 3 sets out the details of the proposed scheme; Section 4 lists the policies considered relevant to this appeal; Section 5 sets out an assessment of the reasons for the Council's reasons for refusal; and Section 6 presents the conclusions.

# Section 2 Background Information

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a) Site Description

2.1 The application relates to a four-storey building in Holborn, situated on the corner of Gate Street and Whetstone Park.



Figure 1. Aerial Photograph of Application Site



Figure 2. Aerial Photograph of Application Site

- 2.2 The application site is four storeys, with a pitched roof and additional basement. The west (Gate St) elevation comprises a rendered commercial unit frontage to the ground floor, with London stock brickwork and timber, single glazed sash windows to the upper floors. The south (Whetstone Park) elevation, which provides access to the upper residential floors, also comprises render to the ground floor, and brickwork to the upper levels; as does the east (rear). Two window openings to the south elevation have been bricked over on the first and second floors; and there is a mixture of single and tripart sash windows. The existing slate roof sits behind a parapet.
- 2.3 Immediately to the north of the site is the adjoining no.4 Gate Street, which is an extended 5-storey building comprising commercial space to the ground floor, four apartments, and a private roof terrace. To the north-east at the rear of the building is the residents' access and rear extension wing to no.4 Gate Street.
- 2.4 The building itself is not listed, but the application site is situated within the Bloomsbury Conservation Area. There are several of listed buildings in the vicinity. Opposite to the south is the rear façade of nos. 1 and 2 Lincolns Inn Fields, and to the north west is Africa House, both of which are Grade II listed. Further afield are The Roman Catholic Church of St Anselm and St Cecilia on Kingsway (Grade II Listed); 233 High Holborn (Grade II Listed); and Powis House on Lincolns Inn Fields (Grade II\* Listed).
- 2.5 Photographs of the site and surrounding area are attached at Appendix 1.

## **Appendix 1**

- 2.6 The site is in flood zone 1, an area with a low probability of flooding, and has a PTAL Rating of 6b with the best possible access to public transport links.

### **b) Planning History**

#### **i) The Site**

- 2.7 The lawful use of the building was established in 2005, when the change of use from offices (then Class B1) to 3 self-contained flats (Class C3) at 1st, 2nd & 3rd floor levels was permitted (ref. **2005/1765/P**). This permission was granted subject to a Section 106 Legal restricting the ability to apply for residents' parking permits.
- 2.8 An application (ref. **2006/5115/P**) for alterations to existing roof involving an increase in ridge height and formation of a new dormer window to the front and 2x to the side elevation in connection with the



formation of an additional self-contained residential flat (Class C3) at roof level of the existing residential building (Class C3) with ground floor cafe (Class A1) was refused in April 2007.

- 2.9 Reasons for refusal included the size and location of the proposed dormer windows, and inadequate floor space to the proposed fourth floor flat. However, the principle of the proposed fourth floor flat and mansard roof was considered to be acceptable in terms of neighbour amenity, daylight, sunlight and outlook.
- 2.10 A further application **2007/2119/P** for the erection of additional storey at fourth floor level and roof extension at fifth floor level to accommodate a 2-bedroom self-contained residential maisonette was withdrawn. This application illustrates the building height relative to neighbouring no.4 Gate Street, indicating they were previously a united pair within the terrace. No.4 Gate Street has since successfully undertaken an upward extension.
- 2.11 An application **2008/1926/P** for the erection of a mansard extension at roof level to enlarge existing self-contained flat at third floor level was granted. This established the acceptability of a mansard including increasing the existing parapet height. This application was renewed in 2011 (ref. **2011/4396/P**).
- 2.12 Application **2022/1065/P** for the erection of an additional storey at fourth floor level (following removal of the roof) and erection of a mansard roof extension to create a new one bedroom self-contained flat (Class C3) with external roof terrace and privacy screen, green roof and alterations to windows on front elevation at third floor was submitted in March 2022 and subsequently refused in November 2022. It is this application which is the subject of this appeal.

ii) The Surrounding Area

- 2.13 At **4A Gate Street** consent was granted at appeal for reconfiguration of the existing fourth floor to provide a sheer fourth floor storey on the west (Gate Street) elevation, erection of a roof extension at fifth floor level and alterations to windows on the west elevation at third floor level, all in association with existing fourth floor flat (Class C3) in September 2009 (APP/X5210/A/09/2104580). A copy of the appeal decision is attached at Appendix 2.

**Appendix 2**

- 2.14 The appeal decision explains that the additional storey was considered to be well designed and in keeping with the character and appearance of the area. Whilst No.4 would become higher than no.2 symmetry was not a matter that should prejudice extensions to the property.
- 2.15 Following this the installation of 2 solar collector panels to roof at fifth floor level was granted in March 2010 (2010/0358/P).
- 2.16 At **71 Lincoln's Inn Fields** permission was granted in July 2010 for retention of change of use from office (Class B1) to five self-contained residential units (4x1 bed and 1x3 bed) at first, second and third floor level (Class C3); Erection of a mansard roof extension to create additional living accommodation for third floor unit and associated alterations (2009/1748/P).
- 2.17 At **1-2 Lincoln's Inn Fields** permission was granted in July 2014 for change of use from offices (Class B1) to a single-family dwelling house (Class C3). Erection of 4 storey lift shaft and rear roof extension with new terrace at 3rd floor level (2013/6109/P).

**c) Summary of Pre-Application Discussions**

- 2.18 A pre-application submission was made in July 2021 with advice received in September 2021 (ref: 2021/2935/NEW). The advice received is provided at appendix 3. It included concerns raised about a ground and basement flat, which has now been omitted from the scheme. It was also advised that as No.4 had been extended this added more value to the height of No.2 as part of the conservation area, termination of the terrace and transition to neighbouring listed buildings.

**Appendix 3**

## Section 3 Appeal Proposals

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3.1 The planning application, which is subject to this appeal, sought approval for the following development:

**“Erection of an additional storey at fourth floor level (following removal of the roof) and erection of a mansard roof extension to create a new one bedroom self-contained flat (Class C3) with external roof terrace and privacy screen, green roof and alterations to windows on front elevation at third floor.”**

3.2 It is proposed to extend the building upwards by one storey, with a mansard roof above. This will add a fourth and fifth floor to the property to create an additional one-bedroom two-storey flat with a roof terrace space.

3.3 The additional floor will be finished in brick and will match the height of 4A. The mansard above will incorporate a roof light with conservation bar to the western elevation, alongside a skylight to the flat roof. The mansard will be finished with traditional slates, alongside a sedum green roof to the flat roof.

3.4 To the rear, the proposal will retain the existing feature chimneys by extending it upwards, with the addition of the roof terrace. The terrace will be set back from the rear façade to minimise its prominence and protect neighbouring amenity, with a hit-and-miss cedar wood fixed privacy screen to the north-eastern corner. A traditional style black metal balustrade will be fitted to prevent access from the terrace to the remainder of the roof space.

3.5 The windows to the third floor of the west and south elevations will be enlarged, to retain the hierarchy of window size, which traditionally decrease to the upper floors. The windows to the newly extended fourth floor will mirror the proportions of those existing third floor windows. All new windows will have flat brick window arches to match the existing window design. This will retain the legibility of the building and align its design with surrounding buildings, in particular the neighbouring building at no. 4 Gate Street.

## Section 4 Planning Policy Summary

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4.1 The following policies and guidance are considered relevant to the appeal scheme:

**a) National Planning Policy Framework (2021)**

4.2 The National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development.

4.3 In regard to housing, **Paragraph 69** notes that small and medium sized sites can make an important contribution to meeting the housing requirement of an area.

4.4 **Chapter 11** provides guidance on making effective use of land in meeting the need for homes, while safeguarding and improving the environment and ensuring safe and healthy living conditions. **Paragraph 120** sets out that planning policies and decisions should (inter alia):

**d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively;**

and

**e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.**

4.5 **Paragraph 126** outlines that good design is one of the fundamental elements in ensuring sustainable development and contributes to creating better places to live and work and helps make development acceptable to communities. **Paragraph 130** seeks developments that (inter alia) function well and add to the overall quality of the area for the long-term, optimise the potential of sites, and are sympathetic

to local character while not preventing or discouraging appropriate innovation or change (such as increased densities).

4.6 **Chapter 16** of the NPPF relates to ‘conserving and enhancing the historic environment’. If significant or less than significant harm is found this must be outweighed by public benefits.

**b) Statutory Development Plan – Existing**

4.7 The most relevant Development Plan policies, as referred to in the Council’s delegated report and decision notice, are considered to be:

i) London Plan (2021)

- **Policy GG2** ‘Making the Best Use of Land’ – this policy seeks to make best use of brownfield land / small sites that are well connected by public transport. The policy encourages decision makers to proactively explore the potential to intensify the use of land to support additional homes.
- **Policy GG4** ‘Delivering the Homes Londoners Need’ – this policy encourages the need for more good quality homes
- **Policy D3** ‘Optimising Site Capacity Through the Design-Led Approach’ – this policy includes a list of criteria which supports development that makes the best use of land following a design led approach
- **Policy H2** ‘Small sites’ - encourages boroughs to pro-actively support well-designed new homes on small sites. Incremental intensification through extension of existing buildings, should generally be supported where they provide well-designed additional housing to meet London’s needs.
- **Policy HC1** ‘Heritage Conservation and Growth’ - requires development proposals to conserve the significance of heritage assets.

ii) Camden Local Plan (2017)

- **Policy G1** ‘Delivery and location of growth’ notes the importance of development located at highly accessible locations, and encourages delivery of high-quality development. Holborn is identified as a growth area under Policy G1(e).
- **Policy H1** ‘Maximising housing supply’ - seeks to exceed the target for additional homes, through regarding self-contained housing as the priority land-use of the Local Plan.

- **Policy D1** 'Design' - welcomes high quality contemporary design which responds to its context, and aims to improve the character and quality of an area and preserve what is distinctive and valued about the local area. It encourages use of high-quality, durable materials and provision of outdoor amenity space.
- **Policy D2** 'Heritage' - outlines that development proposals within conservation areas should preserve or, where possible, enhance the character or appearance of the area. In addition, proposals should not cause harm to significance of a listed building through an effect on its setting.
- **Policy CC1** 'Climate change mitigation' - requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy. Expects all developments to optimise resource efficiency
- **Policy CC2** 'Adapting to climate change' - All development should adopt appropriate climate change adaptation measures. Developments should demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation
- **Policy T2** 'Parking and car-free development' – Requires all new developments to be car free.
- **Policy T1** 'Prioritising walking, cycling and public transport'
- **Policy DM1** 'Delivery and monitoring' – Seeks to use planning contributions where appropriate

## Section 5      Assessment of the Council's Reasons for Refusal

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- 5.1      The application has been refused on the basis that it would cause harm to the character and appearance of the host property, conservation area and setting of nearby listed buildings. Additionally, there was no evidence to show that the new dwelling would achieve required carbon reduction targets, and in the absence of a Unilateral Undertaking or other legal agreement to secure the sustainable transport measures, the proposals were considered unacceptable.
- 5.2      The issues raised are discussed in conjunction with the benefits of the scheme.
- 5.3      It is noted that the Officer's Report confirms that the proposals are acceptable in relation to standard of accommodation and impact on neighbouring amenity.
- a) Reason for refusal 1 – impact on the building, conservation area and setting of nearby listed buildings**
- 5.4      The first reason for refusal outlines that the proposal is considered to result in harm caused to the host building, streetscene this part of the Bloomsbury Conservation Area and would harm the setting of the listed buildings fronting Lincoln's Inn Fields.
- 5.5      From the Officer's Report the Council's objections can be summarised as:
- Gate Street was originally a lower terrace than the grander buildings of Lincoln's Inn Fields. No.2 appears to be the last surviving example of that scale-relationship and is the last remaining element of the 18<sup>th</sup> century height of the street.
  - There would be some harm to 1 and 2 Lincoln's Inn Fields arising from the manner in which the proposals disrupt the historic scale-relationship between the two sites.
  - The extension to no.4 is considered by officer's to have caused harm to the conservation area and is noted to pre-date the Bloomsbury Conservation Area Appraisal and Management Strategy (2011).
  - The elevation is considered architecturally illiterate which undermines the original classical principles which informed the original composition (2 storeys above a strong course should not be on a plain terrace).

- The harm identified is ‘less than substantial’ but there are no public benefits of an adequate nature to outweigh that harm to designated heritage assets.

5.6 Therefore the objection is primarily related to the addition of height and having two floors above the string course. There appears to be no objection to the detailed design of the fenestration, mansard and roof terrace.

5.7 Prior to assessing the reasons for refusal, it is considered relevant to assess the significance of the heritage assets, namely the Bloomsbury Conservation Area and the listed buildings at Lincoln Inn Fields.

i) Significance of this part of the Bloomsbury Conservation Area

5.8 The appeal site is within the Sub Area Character Appraisal of sub area 9 ‘Lincoln’s Inn Fields/Inns of Court/High Holborn’ The Bloomsbury Conservation Area Appraisal sets out that:

**“Established in the 14th century within medieval manor houses, the Inns of Court of Lincoln's Inn and Gray's Inn have a unique character in the context of the Bloomsbury Conservation Area and London as a whole. This character is derived from the marked contrast and transition in scale and sense of enclosure experienced when moving through the interconnected spaces comprising landscaped squares, enclosed courtyards, and narrow passageways and lanes, many of which are vehicle-free with a high volume of pedestrian activity. For over five hundred years the area has been a major centre for the legal profession and for the training of barristers. The current and historic activities associated with the site contribute to the sense of place. Much of the sub area has a secluded and peaceful ambience, with a collegiate feel derived from the courtyard elements.”**

5.9 With specific reference to Gate Street it is stated that:

**“Gate Street and Little Turnstile are two narrow, highly enclosed streets leading from the north-west corner of Lincoln’s Inn Fields, reflect the historic street pattern and are defined by mainly 19th century commercial buildings.”**

5.10 It is therefore considered that the significance arises from the character of the streets and square, the use of the area associated with the legal profession and a range of high quality townhouses. The



transition between this grand square and the narrow surrounding streets such as Gate Street contribute to this character.

iii) Listed Buildings fronting Lincoln's Inn Fields

5.11 The application proposals fall within the setting of several listed buildings and Lincolns Inn Fields which is a grade II registered park and garden. A schedule of the neighbouring listed buildings is attached at Appendix 4. The reason for refusal specifically relates to the setting of the buildings fronting Lincoln's Inn Fields. Lincoln's Inn Fields has a grand scale. However, there is variation in the properties in terms of height, scale, plot size and architectural style, although they maintain a consistent building line. The north side of the square comprises a row of townhouses of different ages and styles, most of which are listed. They tend to occupy narrower plot widths than the properties on the west side. The townhouses on the west side of Lincoln's Inn Fields, whilst terraced, are larger in footprint, predominantly of three principal storeys, grander in scale, and have front forecourts mostly enclosed by railings.

**Appendix 4**

5.12 The officer's report contains particular reference to Nos. 1 -2 Lincoln's Inn Fields which is the closest listed building to the appeal site. This property incorporates two historic townhouses, built as separate properties in 1730 and 1740, then conjoined in 1840, they form the western bookend of the northern terrace of Lincoln's Inn Fields. The listed pair are four storeys with lower ground floor, there are some architectural differences between the original two properties, with No.1 including a decorative string course. To the rear (fronting Whetsone Park), No.2 was extended at third floor level and a new lift added following approval in 2013.

5.13 Overall, the properties around Lincoln's Inn Fields have significance from the squares formal and open character, defined building lines and use.

**b) Assessment of Impact**

i) No.2 Gate Street

5.14 The appeal property comprises a mid-late 18<sup>th</sup> Century building. The property has a simple design with a shopfront at ground floor level and pairs of sash windows to the Gate Street elevation with a simple string course, matching that of No.4. The appeal proposals seek to complement the existing character and match the height of No.4. The proposals retain a hierarchy of windows and the brickwork will match existing.

- 5.15 The proposed upward extension to the parapet and chimneys will preserve these attractive features, forming a partial boundary to the terrace, which is discreetly located to the rear.
- 5.16 The officer's report comments that it is not appropriate to have two storeys above the string course. This string course occurs only on the Gate Street elevation and has a simple design. It is not considered that the provision of an additional floor above this harms the appearance of the property, particularly given its relationship to No.4 and the examples of two floors above string courses found elsewhere in the conservation area.
- 5.17 The appeal building is not a designated heritage asset in its own rights, but forms part of a wider conservation area. It could be considered a non-designated heritage asset which, in accordance with Paragraph 204 of the NPPF, a balanced judgement would need to be made in relation to any perceived harm to the building itself and the significance of the heritage asset. Whilst the appellant maintains there is no harm, any balance should take into account the traditional complementary design proposed and the benefit of providing an additional flat.

ii) The Streetscene

- 5.18 The adjacent buildings in the terrace are of 6 storeys (no.4 Gate St), 7 storeys (no.6 Gate St) and 6 storeys (no.8 Gate St). Directly opposite, Africa House comprises 9 storeys. The scheme has been designed to match the height of 4 Gate Street. The proposed upward extension is therefore considered to be in keeping with the surrounding building heights and will retain and enhance the narrow, enclosed character of Gate Street. To assist the Inspector when assessing the impact on the streetscene a streetscene drawing has been prepared and is attached at appendix 5.

**Appendix 5**

iii) The setting of 1-2 Lincoln's Inn Fields

- 5.19 The proposed parapet line of the appeal site will be 600mm higher than the parapet of 1-2 Lincoln's Inn Fields. Whilst slightly taller, the appeal property retains a simpler design than the listed building, with a narrower frontage and smaller windows. The listed building therefore retains its prominence in terms of the relationship between the two buildings.
- 5.20 The setting of this listed building, characterised by the openness in front of the principle Lincoln's Inn Fields elevation and the narrowness to the side and rear elevations also continues to be retained.

5.21 The proposed mansard is set behind the parapet so that it will only be glimpsed in long views. In these views the taller heights of No.4 and 6 Gate Street area already form part of the setting of the listed building. The spaces between the buildings and the slope of the proposed mansard ensure that the extension does not detract from the significance of this property as 18<sup>th</sup> Century town houses. This is illustrated by the submitted 3D Visualisations which formed part of the original submission.

5.22 Overall, the appellant does not consider that the setting of the listed building will be harmed by the appeal proposals.

iv) The impact on this part of the conservation area and other properties fronting Lincoln's Inn Fields

5.23 As set out above, the proposal retains the character of the existing building through a traditional design. The difference between the enclosed Gate Street and open Lincoln's Inn Field, noted as being significant to the character of this part of the conservation area is also retained.

5.24 Gate Street has been intensified in height since its original origins in 18<sup>th</sup> Century. Whilst 2 Gate Street may be the last remaining building of 18<sup>th</sup> Century height this should not prohibit the development, which complements the character of the property and provides an additional residential unit.

5.25 With regard to Lincoln's Inn Fields, the proposal can be glimpsed from the north western edge of the square at Powis House as shown in photograph 5 of appendix 1, but is not visible from the park as shown in photograph 6 of appendix 1. In the view in Photograph 5 the listed buildings surrounding the square remain prominent and therefore there is considered to be no harm (as further demonstrated in the model images in Section 4.2 of the Design and Access Statement). This also applies to Powis House and 66 Lincoln's Inn Fields where 1 – 16 Lincoln's Inn Fields remains prominent.

v) Public Benefits of the Scheme

5.26 In considering the balance, the proposals would provide a new dwelling within a sustainable location, contributing to the Council's housing target, optimising the use of the land and making the most of a small site in accordance with the NPPF, London Plan Policies GG2, D3 and H2 and Camden Local Plan Policies G1 and H1.

vi) Summary of Reason 1

5.27 Overall, the impact on the character of the heritage assets is considered not harmful, furthermore there are benefits of unifying the terrace through the mansard addition, and the provision of housing in this central location. The design respects and responds positively to the existing buildings, incorporating use of traditional yet durable materials which will ensure the longevity of the building in both design and construction terms. The proposals do not impact on the prominence of the listed buildings. The proposals will therefore not cause harm to the significance of the Conservation Area, or the settings of the nearby listed buildings, in line with National Policy, and London Plan Policies HC1 and D1, and Camden Policies D1, D2 and Camden CPG Design and Housing.

**b) Reasons for refusal 2– climate change mitigation measures**

5.28 Reason 2 sets out that the proposed development would not achieve required carbon reduction targets and as such would not minimise the effects of climate change or meet the highest feasible environmental standards, contrary to policies CC1 (Climate change mitigation) and CC2 (Adapting to climate change) of the London Borough of Camden Local Plan 2017.

5.29 The appellant is committed to combatting climate change. A green roof is included within the design which is listed as an appropriate climate change adaption measure at points B and C of Local Plan policy CC2. It is therefore considered to comply with this policy.

5.30 The requirement to demonstrate a 19% CO<sub>2</sub> reduction below Part L 2013 Building Regulations is supporting text as opposed to policy. Nothing in relation to this was raised at the pre-application stage or at validation (as there is no requirement for an energy statement).

5.31 The proposed flat will be built to current building regulations, including a high level of insulation.

5.32 The proposed new flat will also have an internal air source heat pump. The appellant has used these units specified on other projects of theirs. Details of the other units are provided at Appendix 6. There is no external condenser proposed in this system and therefore no harm to residential amenity of neighbouring properties. A small extract is needed as shown in the revised plan in Appendix 7.

**Appendices 6 and 7**

5.33 The appellant would be happy to have further details of the air source heat pump and the requirement for a 19% CO<sub>2</sub> reduction secured as part of a condition.

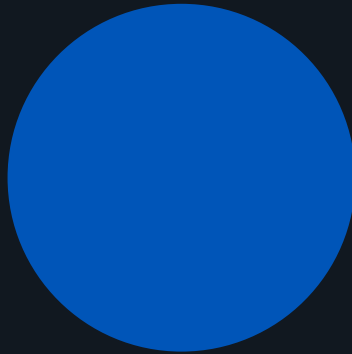
c) **Reasons for refusal 3 and 4 – absence of a Unilateral Undertaking or other legal agreement**

- 5.34 Reasons for refusal 3 and 4 outline that in the absence of a Unilateral Undertaking or other legal agreement securing appropriate mitigation by restricting future occupiers of the development from obtaining parking permits within the Controlled Parking Zone and providing a contribution to off-site cycle parking, the proposed development would fail to promote more sustainable and efficient forms of transport and active lifestyles, contrary to policies T1 (Prioritising walking, cycling and public transport) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.
- 5.35 It is confirmed that a certified unilateral undertaking will be submitted in support of the appeal by the required deadline. Draft heads of terms are provided from the outset including the £720 contribution as outlined in the officer's report.

## Section 6 Conclusions

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- 6.1 This This Appeal Statement has been prepared in support of an appeal against the refusal of planning permission ref: by the London Borough of Camden for erection of an additional storey at fourth floor level (following removal of the roof) and erection of a mansard roof extension to create a new one bedroom self-contained flat (Class C3) with external roof terrace and privacy screen, green roof and alterations to windows on front elevation at third floor at 2A Gate Street.
- 6.2 This Statement of Case has demonstrated that:
- The application will provide an additional residential unit, optimising the use of the site in accordance with the NPPF, London Plan Policies GG2, D3 and H2 and Camden Local Plan Policy G1 and H1.
  - The proposals are appropriately designed to suit the character of the existing building and match the heights of the adjoining property at No.4.
  - The proposals would preserve the character and appearance of the designated heritage assets, including the Bloomsbury Conservation Area and neighbouring listed buildings;
  - The proposals will include measures to respond to climate change including a green roof and an internal heat pump.
- 6.3 A Unilateral Undertaking to restrict future occupiers of the development from obtaining parking permits within the Controlled Parking Zone and providing a cycle parking contribution will be submitted in due course.
- 6.4 Therefore, it is reasonable to conclude that the proposal is not contrary to the Camden Local Plan or the adopted London Plan.
- 6.5 Having regard to the above, the Inspector is respectfully requested to allow this appeal, and grant planning permission.



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