



Tanner & Tilley

PLANNING STATEMENT

**In support of application for full planning permission
for
the installation of an enclosed lift platform and associated works
at
London Ikeda Peace Centre, 7 Wakefield Street, London, WC1N 1PG.**



**On behalf of
SGI-UK**

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Development Consultants

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INTRODUCTION

- 1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all proposals to comply with the Development Plan unless material considerations indicate otherwise. This Statement examines the proposals in the context of national planning policy guidance, strategic and local policy. It will demonstrate that the proposals are policy compliant.
- 1.2 Soka Gakkai International (SGI) is a worldwide society for the creation of value founded upon the Buddhism of Nichiren Daishonin. The SGI is a registered charity with four centres in the United Kingdom and a membership of over 14,500 people. At the centres members and the public come together to chant, study and plan events. These are cultural centres rather than traditional temples or churches.
- 1.3 The London Ikeda Peace Centre is housed in a three storey 19th century building on the west side of Wakefield Street. Its ground floor is above street level and is accessed by a flight of three steps. It does not therefore provide safe and convenient access for disabled persons visiting the centre. It is therefore proposed to provide lift access.

2.0 BACKGROUND

- 2.1 The Peace Centre was originally the church hall to the Presbyterian Church fronting Tavistock Road and dates from the early part of the last century. It was extensively bomb damaged during the Second World War.
- 2.2 Whilst there is no relevant recent planning history on the site it is worth noting that planning permission was granted in March 2012 (LPA ref 2011/6032/P) for a mixed use redevelopment of warehousing to the rear and side of the Peace Centre.
- 2.3 In 2021 pre-application advice was sought from the LPA in respect of the application proposals. (LPA ref 2021/3663/PRE) The LPA's response dated 11th

April 2022 and subsequent discussions have been taken into account in the formulation of the final design for the lift enclosure.

- 2.3 The site is located within the Bloomsbury Conservation Area and falls within Sub-Area 12: Corams Fields/Brunswick Centre. The Conservation Area Appraisal notes that the building makes a positive contribution.

3.0 PLANNING POLICY

The National Planning Policy Framework (July 2021)

- 3.1 So that sustainable development is pursued in a positive way, at the heart of the National Planning Policy Framework (NPPF) is the presumption in favour of sustainable development. Achieving sustainable development means that the planning system has three overarching principles which are interdependent. These are the economic objective, the social objective and the environmental objective.
- 3.2 As stated in paragraph 11 planning policies and decisions should apply the presumption in favour of sustainable development and approve development proposal that accord with an up-to-date development plan without delay.
- 3.3 Paragraph 92 notes that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
- 3.4 In terms of achieving well-designed places policies and decisions should ensure that developments will function well and add to the overall quality of the area; are visually attractive; are sympathetic to local character and history; establish or maintain a strong sense of place; optimise the potential of sites; and create places that are safe, inclusive and accessible and which promote health and well-being. (paragraph 130)

- 3.5 Section 8 of the NPPF seeks to promote healthy communities. To this end paragraph 82 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
- 3.6 Heritage Assets are defined in the glossary to the National Planning Policy Framework as:
A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).
- 3.7 As stated in paragraph 202 where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset planning consent should be refused. However, where a development will lead to less than substantial harm to a designated heritage asset this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The Development Plan

- 3.8 The Development Plan comprises the London Plan 2021 and the Camden Local Plan 2017.

The London Plan

- 3.9 Policy GG1 Building strong and inclusive communities states that those involved in planning and development must support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently,

independently, and with choice and dignity, avoiding separation or segregation.

- 3.10 Policy D5 Inclusive design states that development proposal should achieve the highest standards of accessible and inclusive design and should be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment and be able to be entered, used and exited safely, easily and with dignity for all.
- 3.11 Policy HC1 Heritage and growth states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Camden Local Plan 2017

- 3.12 Policy C1 Health and wellbeing requires that measures that will help contribute to healthier communities and reduce health inequalities must be incorporated in a development where appropriate.
- 3.13 Policy C6 Access for all states that the Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. They will therefore expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.
- 3.14 Under Policy D1 Design the Council will seek to secure high quality design in development. To this end the Council will require that development satisfies a list of design criteria including that respects local context and character; preserves or enhances the historic environment and heritage assets in accordance with "Policy D2 Heritage"; and is inclusive and accessible for all; and carefully integrates building services equipment.

- 3.15 Policy D2 Heritage states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.
- 3.16 Policy A1 Managing the impact of development states that the Council will seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity.
- 3.17 Policy A4 Noise and vibration states that the Council will seek to protect the quality of life of occupiers and neighbours. It will grant permission for development unless this causes unacceptable harm to amenity and We will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity.
- 3.18 Although not part of the Development Plan and Management Strategy Camden Planning Guidance (CPG) and the Conservation area Appraisal Strategy are important material planning considerations which carry significant weight.
- 3.19 CPG Access for all (March 2019) sets out a number of key messages including that the Council expects all development of buildings and places, including changes of use and alterations or refurbishment of existing buildings, to be inclusively designed and useable by all to promote equality of opportunity. It states that for listed buildings and other heritage assets, the Council will balance the requirement to provide access with the interests of conservation and preservation. Sensitive design solutions that achieve access for all, to and within listed buildings, should be sought.
- 3.20 CPG Design (January 2021) outline the ways in which developments can achieve high quality design. The Council will outline the ways in which developments can achieve high quality design taking account of the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality and health and wellbeing.

- 3.21 CPG Amenity (January 2021) contains a section on noise and vibration. It notes that noise and vibration can have a significant impact on amenity, quality of life and wellbeing. The Council will assess the impact of noise and vibration through acoustic reports submitted by applicants.
- 3.22 The Bloomsbury Conservation Area Appraisal and Management Strategy was adopted on 18th April 2011. The initial designation of Bloomsbury as a conservation area in 1968 sought to protect elements of development from the Georgian and earlier eras but excluded areas where there had been significant later redevelopment. There have been numerous subsequent extensions that have mostly reflected a growing appreciation of Victorian and Edwardian and high-quality 20th century architecture. The application site falls within Sub Area 12: Coram's Fields/Brunswick Centre. It notes that Opposite, no.7 Wakefield Street is a two-storey late 19th century hall built in red brick with stone dressings in a neo-Tudor style, which is used by various community organisations. Section 3 sets out the general approach to development within the Conservation Area stating that applications for development will be determined having regard to the special interest of the Conservation Area and the specialist advice of conservation officers.

4.0 POLICY RESPONSE

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all proposals to comply with the Development Plan unless material considerations indicate otherwise. In addition, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the Conservation Area.
- 4.2 For a successful development that satisfies the applicant's requirements there has to be a synergy between the design & conservation policies and those aimed at achieving safe and inclusive access to the building for all. The solution, which

is explained in detail in the Design and Access Statement, is to site a lift enclosure on a secondary elevation to the building discretely sited in a recess of the building on the Wakefield Street frontage. A lift enclosure is by definition a modern feature in the context of a period property set in a historic area. In design terms it is entirely proper that it should be contemporary in appearance setting it apart from and thereby not diminishing the character of the original building. Its siting and design enable the original historic features of the building will not be lost. In this instance a careful choice of materials taking reference from the recently constructed buildings opposite is entirely appropriate. The architectural integrity of the original building it therefor retained.

4.3 With regard to impact on the character and appearance of the Bloomsbury Conservation Area whilst it is accepted that the Peace Centre building makes a positive contribution the introduction of the lift enclosure as proposed will not harm the significance of the designated heritage asset. In terms of paragraph 202 of the NPPF any harm that is less than substantial needs to be weighed up against the public benefits of the proposal. The public benefits of providing an all-inclusive access to the building is self-evident.

4.4 The proposed lift enclosure is opposite recently completed residential properties on the south side of Wakefield Street. The design and specification of the lift and its enclosure will not result in any impact on the amenities of the occupants of those properties. The lift is enclosed thereby ensuring there is no loss of privacy to residents and no light pollution emanating from the structure. In terms of noise impact the application is accompanied by an acoustic report which demonstrates that there will be no significant impact on the amenities of residents or the general public.

5.0 CONCLUSION

5.1 The proposals will provide a much-needed access to the building to cater for the needs of those visitors and staff that are less mobile and are currently discriminated against if they are unable to take part in the cultural activities and

- studies offered by the centre. The proposals therefore fully accord with Policies GG1 and D5 of The London Plan, Policies C1 and C6 of the Camden Local Plan and Camden's CDG Access for all.
- 5.2 The development proposed fully satisfies the design led policies of the London Plan and Camden Local Plan. The proposed lift enclosure has been carefully designed and sited so as to have a minimal impact on the integrity of this important period building and on the character and appearance of the surrounding area. It causes minimal harm to the designated heritage asset that is the Bloomsbury Conservation Area. It therefore complies with Policy HC1 of the London Plan, Policies D1 and D2 of the Local Plan and the CDG on design.
- 5.3 The amenities of residents are protected in accordance with Local Plan policies A1 and A4 and the CDG on amenity.
- 5.4 The proposals make optimum and effective use of this building in a sustainable location, thus satisfying national planning policy guidance, and the detailed policies contained in the Development Plan. The proposals satisfy paragraph 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. There are no material planning considerations that prejudice the granting of planning permission for the proposed development. Thus, having regard to Section 38(6) of the Compulsory Purchase and Planning Act 2004 there is thus a strong presumption that planning permission should be granted.