

<b>Delegated Report</b>		<b>Analysis sheet</b>		<b>Expiry Date:</b>	12/01/2023
		N/A		<b>Consultation Expiry Date:</b>	26/02/2023
<b>Officer</b>			<b>Application Number(s)</b>		
Daren Zuk			2022/5066/P		
<b>Application Address</b>			<b>Drawing Numbers</b>		
36-37 Great Russell Street London Camden WC1B 3PP			<i>See decision notice</i>		
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>		
<b>Proposal(s)</b>					
Erection of part full, part half-width three-storey rear extension to facilitate the creation of 4 residential units (Class C3) and additional commercial use (Class E) at basement and ground floor levels. Creation of new roof terrace, replacement of staircase hatch to existing main roof, installation of ASHP at roof level, and associated external fenestration alterations at rear.					
<b>Recommendation(s):</b>		<b>Refuse Planning Permission</b>			
<b>Application Type:</b>		<b>Full Planning Permission</b>			
<b>Conditions or Reasons for Refusal:</b>		<b>Refer to Draft Decision Notice</b>			
<b>Informatives:</b>					
<b>Consultations</b>					
		No. of responses	<b>00</b>	No. of objections	<b>00</b>
<b>Neighbour Consultation</b>		Site Notice: posted 27/01/2023, expired 20/02/2023 Press Notice: published 02/02/2023, expired 26/02/2023  <i>No responses received.</i>			
<b>Bloomsbury CAAC</b>		<i>No response received.</i>			
<b>Site Description</b>					
The site is located on the southern side of Great Russell Street and comprises a four-storey building plus basement. Its rear yard projects past its neighbour at no.38 and behind 2 Willoughby Street to the side, so that the rear façade of the upper floors are visible from Willoughby Street. The basement, ground, first, and second floors consist of Class E commercial floorspace. The third floor consists of two currently vacant one-bedroom residential (Class C3) units. It lies within the Bloomsbury Conservation Area, which notes the building as a positive contributor to the conservation area.					

## Relevant History

**2022/3001/P** – Erection of rear extensions at basement to 2nd floor levels to provide enlarged retail space at basement and ground floor (as approved on 23/08/2016 ref 2016/2795/P) and two new self-contained 1 bedroom flats at first and second floors with associated new internal lift; provision of communal cycle and refuse stores at ground floor; conversion of two 1 bed flats to one 2 bedroom flat on third floor; retention of existing office use at part 1st and part 2nd floors; creation of new roof terrace at rear 1st floor; replacement of staircase hatch by larger one to existing main roof terrace; and associated external fenestration alterations. **Granted 02/03/2023 (not implemented)**

**2019/2544/PRE** – Change of use of basement, ground and third floor of building to office (B1a) use; erection of fourth floor extension (with setback); erection of rear extension to provide additional office (B1a) space and associated alterations to building. **Advice Issued 26/07/2019 (not implemented)**

**2018/4940/P** – Erection of rear extensions at basement to 2nd floor levels to provide enlarged Class A1 retail space at basement and ground floor (as approved on 23/08/2016 ref 2016/2795/P) and enlarged Class B1 office space at first and second floors with associated roof terrace on rear 1st floor; conversion of two existing 1 bedroom flats to one 2 bedroom flat on third floor; replacement of staircase hatch by larger one to existing main roof terrace; and associated external fenestration alterations. **Granted 27/03/2019 (not implemented)**

**2017/2149/P** – Erection of rear extensions at basement to 2nd floor levels to provide enlarged retail space at basement and ground floor (as approved on 23/08/2016 ref 2016/2795/P) and two new 1 bedroom flats at first and second floors with associated new internal lift; provision of communal cycle and refuse stores at ground floor; conversion of two existing 1 bedroom flats to one 2 bedroom flat on third floor; retention of existing office use at part 1st and part 2nd floors; creation of new roof terrace at rear 1st floor; replacement of staircase hatch by larger one to existing main roof terrace; and associated external fenestration alterations. **Granted 19/07/2018 (not implemented)**

**2016/2795/P** – Infill extension at basement and ground floor level to the rear (Use Class A1). **Granted 23/08/2019**

**2016/0173/PRE** – External façade alterations, two storey rear extension and alterations at roof level with a new terrace, to provide an additional 3 x flats within the building. **Advice Issued 23/05/2016**

## Relevant Policies

### National Planning Policy Framework 2021

### The London Plan 2021

### Camden Local Plan 2017

Policy G1 Delivery and Location of Growth  
Policy H1 Maximising Housing Supply  
Policy H4 Maximising the Supply of Affordable Housing  
Policy H6 Housing Choice and Mix  
Policy H7 Large and Small Homes  
Policy A1 Managing the impact of development  
Policy A4 Noise and Vibration  
Policy D1 Design  
Policy D2 Heritage  
Policy E1 Economic Development  
Policy E2 Employment Premises and Sites  
Policy T1 Prioritising Walking, Cycling, and Public Transport  
Policy T2 Parking and Car-Free Development  
Policy CC1 Climate Change Mitigation  
Policy CC2 Adapting to Climate Change  
Policy DM1 Delivery and Monitoring

### Camden Planning Guidance (CPG)

CPG Design  
CPG Amenity  
CPG Employment Sites and Business Premises

## Bloomsbury Conservation Area Appraisal and Management Strategy 2011

### Assessment

#### 1. Proposal

1.1. The applicant seeks planning consent for the following:

- Erection of part full width/part half width rear extension from first to third floor levels;
- Infilling of existing lightwell from basement to ground floor levels;
- Creation of 3x two-bedroom and 1x one-bedroom self-contained residential units (Use Class C3);
- Expansion of existing commercial (Class E) floorspace at basement and ground floor levels;
- Creation of new roof terrace;
- Replacement of existing roof staircase hatch with larger structure; and
- Alterations to rear fenestration.

#### 2. Planning Considerations

2.1. The material considerations in the determination of this application are as follows:

- Land Use
- Dwelling Mix
- Affordable Housing
- Standard of Accommodation
- Design & Conservation
- Amenity
- Transport
- Sustainability
- Refuse & Recycling
- Section 106 Obligations

#### 3. Land Use

3.1. The proposal includes the expansion of commercial (Class E) floorspace at basement and ground floor levels, facilitated by the infilling of existing rear lightwells. The existing offices at first and second floors will be retained although a small amount will be lost on each floor to accommodate a new lift for the new flats at the rear. The loss of floorspace is minimal and the new layout will continue to provide adequate and acceptable accommodation. The retention and expansion of the existing commercial floorspace is welcomed and complies with Policies E1 and E2 of the Local Plan.

3.2. The addition of new housing is supported by Policy H1. The loss of two sub-standard one-bedroom flats and the proposal for 1x one-bedroom and 3x two-bedroom self-contained residential units would provide a net increase of two residential units, a mix of units and unit sizes, in accordance with Policy H7 of the Local Plan.

#### 4. Dwelling Mix

4.1. The Council requires development to contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes. Policy H7 of the Local Plan includes a Dwelling Size Priorities Table as set out below:

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

4.2. Policy H7 seeks to ensure that all housing development: (a) contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and (b) includes a mix of large and small homes. The proposal includes the creation of 1x one-bedroom and 3x two-bedroom self-contained flats, of which the two-bedrooms units are regarded as a high priority in the above table. No large homes would be provided but given the relatively low number of units provided overall, this is acceptable. Therefore, the proposed unit mix is welcomed and complies with Policy H7 of the Local Plan.

## 5. Affordable Housing

5.1. Policy H4 (maximising affordable housing) requires a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. The policy states that where developments have a capacity for fewer than 10 additional dwellings, the Council will accept a payment in lieu of affordable housing.

5.2. Targets are based on an assessment of development capacity whereby 100 sqm GIA of housing floorspace is generally considered to create capacity for one home and a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% for each home added to capacity.

5.3. Where development has the capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing. A rate of £5,000 per sqm GIA is applied. On this basis of an uplift of 282sqm residential floorspace, the contribution would be £84,600:

*Additional residential floorspace (282 sqm GIA) x 6% (capacity for 3 additional homes x £5,000 = £84,600.*

5.4. This is based on measurements taken from the submitted plans by the applicant. This payment would be secured through a Section 106 legal agreement if the proposal were considered acceptable in all other regards. The failure to grant planning permission and therefore enter into a Section 106 legal agreement to secure payment-in-lieu of affordable housing would form a reason for refusal.

## 6. Standard of Accommodation

6.1. Policy H6 outlines how the Council will seek to secure high quality accessible homes in all developments that include housing. We will:

- encourage design of all housing to provide functional, adaptable and accessible spaces;
- expect all self-contained homes to meet the nationally described space standard;
- require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2); and
- require 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).

6.2. The proposal consists of 3x two-bedroom and 1x one-bedroom self-contained residential units. Each of the new flats meets minimum national space standards as outlined in the table below:

Unit	Unit Type	Minimum GIA	Proposed GIA
Flat A	2Bed/3Person	61sqm	67sqm
Flat B	2Bed/3Person	61sqm	67sqm
Flat C	2Bed/3Person	61sqm	96sqm
Flat D	1Bed/2Person	50sqm	52sqm

- 6.3. Flats A, B, and D are dual-aspect with windows facing east and south. However, their habitable room windows would have an open aspect and daylight from the Willoughby Street. The habitable rooms would also be over 18m away from the properties on the east side of Willoughby Street, thereby providing a satisfactory degree of privacy. Flat C on the third floor is dual aspect and would be provided with a good level of light and outlook.
- 6.4. A separate ground-floor access would be provided for the residential portion of the building which would comprise a stairwell and lift. The commercial floors of the building would have access from the eastern door and separate stairwell.
- 6.5. Flat A on the first floor would feature a private external amenity space in the form of a terrace on the roof of the ground floor extension. The existing roof terrace on the roof of the main building would be retained and expanded to 160sqm to provide a generous outdoor amenity area for communal use by all residential occupiers. Although it is the aim for all new residential dwellings to feature private outdoor amenity space, it is appreciated that due to site constraints this is not achievable in this case. It is understood that the provision of a communal roof terrace helps mitigate the absence of private outdoor amenity area in this instance.

## 7. Design & Conservation

- 7.1. The Council's design policies are aimed at achieving the highest standard of design in all developments. Policy D1 states that the Council will require all developments to be of the highest standard of design and to respect the character, setting, form and scale of neighbouring buildings, and the character and proportions of the existing building. Policy D2 states that within conservation areas, the Council will only grant permission for development that 'preserves or, where possible, enhances' its established character and appearance.
- 7.2. Camden's Design CPG emphasises Camden's commitment to design excellence, and expects development schemes to consider:
- The context of a development and its surrounding area;
  - The design of the building itself;
  - The use and function of buildings;
  - Using good quality sustainable materials;
  - Creating well connected public spaces and good quality public realm;
  - Opportunities for promoting health and well-being; and
  - Opportunities for improving the character and quality of an area.
- 7.3. Paragraph 5.28 in the Bloomsbury Conservation Area Appraisal and Management Strategy (2011) (the 'Management Strategy') requires that proposals must preserve or enhance the character or appearance of the conservation area. Paragraph 5.29 continues, outlining that high quality design and execution will be required of all new development at all scales.
- 7.4. Paragraph 5.31 of the Management Strategy outlines that the appearance of all buildings of historic interest, whether listed or unlisted, within the conservation area are harmed by the removal or loss of original architectural features and the use of inappropriate materials. In all cases, it is expected that original architectural features and detailing are to be retained, repaired, protected, or refurbished in the appropriate manner. Full replacement will only be permitted when it can be demonstrated that the features are beyond repair.
- 7.5. Paragraph 5.4 of the Management Strategy states that alterations and extensions to existing buildings can have a detrimental impact either cumulatively or individually on the character and appearance of the

area. This includes inappropriate design of extensions including the size and proportion of openings, and extensions of excessive scale, massing, or height.

### *Significance of conservation area and site*

- 7.6. Bloomsbury conservation area represents a period of London's early expansion northwards, dating from Stuart times (around 1660), which continued through the Georgian and Regency periods to around 1840. The quintessential character of the Conservation Area derives from the grid of streets enclosed by mainly three and four storey development which has a distinctly urban character of broad streets interspersed by formal squares which provide landscape dominated focal points. The townhouses arranged in terraces is the predominant form across the area, reflecting the speculative, (mainly) residential development of the Stuart, Georgian, Regency and early Victorian periods. This gives a distinctive, repeated grain to large parts of the area. A terrace of three terraced houses which are of architectural interest as examples of eighteenth and nineteenth century domestic architecture as well of townscape interest. Of significance as examples of nineteenth century domestic architecture, sitting within a wider, planned townscape. Both buildings, together with 38, are marked in the conservation area appraisal as making a positive contribution to the character and appearance of the conservation area.
- 7.7. Great Russell Street itself was laid out in around 1670 and developed with town houses. However, with the construction of the British Museum many of the buildings on the street were either re-fronted or rebuilt in the mid nineteenth century. Additionally shops were inserted in the ground floor of domestic terraces to serve the increased population of the area.
- 7.8. Looking at the applications buildings, they form a cohesive group with 38 Great Russell Street and the wider townscape on the south side of Great Russell Street. The buildings date from the 1860s and were designed by William Finch Hill with a stuccoed facades and classically influence detailing. Numbers 36-37 read as a symmetrical pair. On the rear elevation the façade is stuccoed and capped with a cornice. The symmetry is reflected in the staggered windows arrangement on both buildings where the stairs are located.

### *Assessment*

- 7.9. The host building, which is noted as making a positive contribution to the Bloomsbury Conservation Area, is wholly unaltered on the front elevation and largely unaltered at the rear aside from a ground floor rear extension encompassing the entirety of the rear portion of the property. The proposal would involve the full removal of the rear facade in order to create a 2.8m deep extension from the ground to third floor levels (three storeys), in addition to a three-storey closet wing rear extension. The existing lightwell at basement and ground floor levels would also be infilled in order to create more internal office space.
- 7.10. The full width, three-storey rear extension to no.36 would add 2.8m in depth to the entire rear facade and would align with the existing rear building line at neighbouring no.38 Great Russell Street. Although the new rear elevation would be constructed in matching brickwork with fenestration that would replicate the existing condition, the proposal would undermine the integrity of each building and site as two separate buildings. Due the site's location, near a corner, the visible rear of the building can easily be associated with being part of the Great Russell Street properties. As such, the vertical proportions and definition of these being historically, two separate properties in an important feature. This can also be seen by the visible chimney stack which would run down through the buildings and divide them in two. In addition the rear façade features well-proportioned sash windows and staggered windows to the stair cases, all of which are characteristic features of this type of property. The proposed rear of the building completely removes this historic façade and replaces it with an uncharacteristic form which has a harmful impact on the conservation area. The design of the rear does not respect the historic context and treats two separate buildings as if they were one.
- 7.11. The depth of the existing building has a relationship with its plot width and the composition of the wider building group. The full width extension rearwards would result in the loss of this considered proportion and would be to the detriment of the site's relationship with its neighbours at nos. 34 and 38 Great Russell Street which are wider and deeper corner buildings that 'bookend' the building group. Fully altering and extending the rear elevation of the host pair would therefore disrupt that relationship and hierarchy. Thus, this element of the proposal is contrary to Policies D1 and D2 which require that additions to existing buildings be modest in size and scale, and respect the form and character of the existing building.

- 7.12. The three-storey, rear wing extension would occupy more than the width of no.36, extending beyond the party wall of the two buildings. The height of the extension would also align with the existing roof level. The closet wing extension would result in a massive, bulky rear extension that does not read as subordinate or take the proportions of the existing building into consideration. Due to its ultimate scale, height, and bulk, the rear wing extension is contrary to Policies D1 and D2.
- 7.13. It is noted that this proposal features similarities to the previously approved scheme (2022/3001/P, dated 02/03/2023) which permitted a two-storey partial width rear extension. This application was approved on the grounds that the two-storey height of the rear extension is subservient in nature, and would preserve a large part of the historic rear facade. Although visible from Willoughby Street, it is well set back from the street and would be read against the bulk of the higher flank walls behind, so that it does not appear as an overly bulky or obtrusive addition in the street scene. It is considered that this approved scheme is the maximum additional massing appropriate for the property, without being overbearing and whilst retaining sufficient amounts of historical fabric and facade.
- 7.14. The infilling of the existing rear lightwell at basement and ground floor levels is not considered to harm the character and setting of the existing building or wider conservation area, and is therefore considered acceptable.
- 7.15. It is considered that due to the excessive size, form, height, and bulk the full width rear extension and closet wing extensions would not read as subservient additions to the host building. The full removal and loss of the original historic facade (and associated architectural features), which is highly visible from public views along Willoughby Street, would therefore cause harm to the host buildings and the character and appearance of the conservation area.
- 7.16. Special attention has been paid to the desirability of preserving or enhancing the character or appearance of the conservation area, under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013.
- 7.17. Policy D2, consistent with the NPPF, seeks to preserve and enhance heritage assets, stating that the Council will not permit development that results in harm that is 'less than substantial' to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

## **8. Amenity**

- 8.1. Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The factors to consider include visual privacy, outlook; sunlight, daylight and overshadowing; artificial lighting levels; noise and vibration; odour, fumes and dust; and impacts of the construction phase, including the use of Construction Management Plans.
- 8.2. The proposed rear extension and new residential units are not considered to create any new amenity impacts upon neighbouring residential occupiers. The closest residential property, located on the upper floors at no.38 Great Russell Street, will not be within direct sight lines of the new residential units. Further, the proposed extension is sited against two blank flank walls of adjoining properties and is sufficiently set back from Willoughby Street. The new terrace at first floor level (Flat A) will feature a privacy screen, to further ensure there is no overlooking impacts. This would be secured by condition.
- 8.3. Therefore, the proposed extension and new residential units will not result in any loss of light or outlook to neighbouring residential properties, complying with Policy A1 of the Camden Local Plan 2017 and CPG Amenity.

## **9. Transport**

- 9.1. Policy T1 aims to promote sustainable transport by prioritising walking, cycling, and public transport. This is achieved by improving pedestrian friendly public realm, road safety and crossings, contributing to the cycle networks and facilities, and improving links with public transport. All these measures are in place to ensure the Council meets their zero carbon targets.

- 9.2. In line with Policy T1 of the Local Plan, it is expected that cycle parking at developments be provided in accordance with the standards set out in the London Plan. The submitted plans do not show any cycle parking for the Class E floor space and seven spaces for the residential units at ground floor level. The residential cycle parking would take the form of 2x Sheffield stands (3 spaces) and 4x semi-vertical racks. As the use of semi-vertical racks is not recommended, revised plans showing two-tier racks would have been requested if the proposal was deemed supportable, and secured through condition. With regard to the lack of office cycle parking, this is considered acceptable given the lack of floor space available within this building.
- 9.3. In accordance with Policy T2 of the Local Plan, all four flats should be secured as car free by means of a S.106 Agreement. This will prevent the future occupants from applying for resident parking permits which would add to existing on-street parking pressure, traffic congestion and air pollution, whilst encouraging the use of more sustainable modes of transport such as walking, cycling and public transport. The commercial floor space should also be secured as on-street Business parking permit free by means of the S.106 Agreement. In the absence of a legal agreement, this would be a reason for refusal.
- 9.4. Given the amount of demolition, strip out, and construction works required in this central location, and in close proximity to the British Museum, it is recommended that a Construction Management Plan and associated Implementation Support Contribution of £3,920 and Impact Bond of £7,500 be secured by means of the S.106 legal agreement. This will help ensure that the proposed development is carried out without unduly affecting neighbouring amenity or the safe and efficient operation of the local highway network. There are double yellow lines and loading restrictions on both sides of Great Russell Street in this location and so vehicular access to the site will prove difficult. Details of how this will be managed therefore need to be secured through the CMP. In the absence of a legal agreement, this would be a reason for refusal.
- 9.5. A highways contribution is not considered necessary from this development as any damage that occurs to the adjacent footway will be covered by the scaffolding bond that is secured under the scaffold licensing process.

## **10. Sustainability**

- 10.1. Policies CC1 (Climate change mitigation) and CC2 (Adapting to climate change) require all developments to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards. The current proposal would result in the part retention and refurbishment of the existing building,, however, would involve substantial demolition of the rear of the building which is cause for concern.
- 10.2. Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rainwater and grey water on-site.
- 10.3. Policy CC1 (Part E) of the Local Plan requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. However, in this case the demolition is associated with extensions to the existing building rather than wholesale demolition of the existing building in order to construct a new building. As such, officer's do not consider Policy CC1 applicable in this instance. Were planning permission planning to be granted, a condition would be attached to ensure that 95% of demolition waste is diverted from landfill to ensure waste is managed in the most sustainable manner.

## **11. Refuse and Recycling**

- 11.1. Camden Local Plan Policy CC5 (Waste) and CPG (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.



11.2. The proposal includes refuse and recycling storage located underneath the residential stairwell on the ground floor level. This is deemed to be unacceptable with regards to Building Regulations due to fire safety concerns under the sole means of escape. If the proposal was deemed acceptable, a revised refuse and recycling plan would be requested.

## **12. Planning Balance**

12.1. The Housing Delivery Test (HDT) is an annual measurement of housing delivery in the area of relevant plan-making authorities introduced by the government. It measures whether planned requirements (or, in some cases, local housing need) have been met over the last 3 years. The government's most recently published figure is for 2021, when the measurement for Camden was 76% - which means that Camden has to produce an action plan and apply a 20% buffer to our 5-year housing land supply. In view of this measurement, officers have recently reviewed the 5-year housing land supply as part of the Authority Monitoring Report, and have concluded that the amount of deliverable housing land in the borough falls substantially short of what is needed for a 5-year supply. Consequently, the presumption in favour of sustainable development in paragraph 11(d) of the NPPF is engaged, and there is a need to place great weight on the provision of housing in decision making. The NPPF indicates that applications should be granted unless their adverse impacts would significantly and demonstrably outweigh their benefits when assessed against NPPF policies as a whole.

12.2. Although the proposed scheme would provide public benefits including two additional new units and Affordable Housing payment-in-lieu it is not sufficient to outweigh the harm caused to the host buildings and wider conservation area due to the proposed rear extensions. Thus, the application is recommended for refusal on this basis.

## **13. Conclusion**

13.1. The proposals, owing to the height, scale, bulk and design of the proposed extensions would be detrimental to the character and appearance of the host buildings and their relationship to the wider building group and subsequently have a harmful impact on the conservation area. Paragraph 202 of the NPPF seeks to preserve and enhance heritage assets, stating that the Council will not permit development that results in harm that is 'less than substantial' to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm. In this instance the public benefits comprise an uplift of two residential units but would also improve the standard of accommodation overall. In addition, a financial contribution of £84,600 to the supply of affordable housing in the borough would be payable.

13.2. When considering the overall planning balance, which is further tilted by the presumption in favour of sustainable development, the public benefits of the scheme are not considered to outweigh the identified harm and conflicts identified with the Development Plan. As such, the proposal is contrary to policies G1, D1 and D2 of the Camden Local Plan 2017.

## **14. Section 106 Obligations**

14.1. If the proposals were supported, the following heads of terms would need to be secured by Section 106 legal agreement to make the development acceptable.

- Affordable Housing Contribution £84,600
- Car-Free Development
- Construction Management Plan and Impact Bond

14.2. The proposal would be liable to the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL as it involves the creation of less than 100sqm of floorspace and one new residential unit.

## 15. Recommendation

15.1. Refuse planning permission on the following grounds:

- The proposed extensions, by virtue of their height, scale, and design, would have a harmful impact on the character and appearance of the host buildings, their relationship to the wider building group and the Bloomsbury Conservation Area, contrary to the requirements of Policies D1 and D2 of the Camden Local Plan 2017.
- The proposed development, in the absence of a legal agreement securing an affordable housing contribution, would fail to maximise the supply of affordable housing to meet the needs of households unable to access the market housing stock, contrary to Policy H4 (Maximising the supply of affordable housing) of the Camden Local Plan 2017.
- The proposed development, in the absence of a legal agreement securing car-free housing, would contribute 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 Camden Local Plan 2017.
- The proposed development, in the absence of a legal agreement securing a Construction Management Plan and associated Implementation Support Contribution, and Impact Bond, to ensure that the proposed development is carried out without unduly affecting neighbouring amenity or the safe and efficient operation of the local highway network, is contrary to Policy A1 (Amenity) of the Camden Local Plan 2017.