

Date: 29 January 2024

**Our Ref: LP429**  
**Planning Portal Ref: PP-12726353**

London Borough of Camden  
Development Management  
Camden Town Hall Extension  
Argyle Street  
London  
WC1H 8EQ

Dear Sir/Madam,

**FULL PLANNING APPLICATION**  
**26-27 KING'S MEWS, LONDON, WC1N 2JB**  
**PP-12726353**

On behalf of our client, 1156 Limited, please find enclosed a full planning application for the redevelopment of the above site.

This covering letter identifies the key constraints and planning considerations of relevance for the assessment of the proposal. **Appendix A** of this letter contains a summary of the key planning policies of relevance relating to land use, design, residential amenity and transport.

**Appendix B** is a copy of the pre-application advice letter issued by the London Borough of Camden in September 2023 (ref. 2023/1265/PRE). The Applicant has addressed all the matters raised in the pre-application phase and the current proposal is, in our opinion, fully compliant with Camden's development plan policies and it should be approved as soon as practicable.

The description of development is as follows:

*"Demolition of existing office/warehouse (Class E/B8) at 26 King's Mews, erection of part three, part four-storey office building (Class E) with basement, and amalgamation with existing office building at 27 King's Mews."*

In respect of the above, please find enclosed the following documents:

- Covering Letter with Planning Statement (this document, prepared by Logic Planning);
- Application Form with Certificate B;
- CIL Form;
- Design and Access Statement (prepared by SabbadinCorti);
- Drawings of existing and proposed plans and elevations (prepared by SabbadinCorti);
- Basement Impact Assessment (prepared by Milvum Engineering Services);

- Ground Investigation Report (prepared by Ground Engineering);
- Daylight and Sunlight Report (prepared by AnsteyHorne);
- Heritage Impact Assessment (prepared by HCUK Group);
- Archaeological Desk Based Assessment (prepared by HCUK Group);
- Energy Statement (prepared by SabbadinCorti);
- Construction Management Plan pro-forma;
- Construction and Traffic Management Plan (prepared by SabbadinCorti); and
- Fire Statement (prepared by SabbadinCorti);

The application fee of £1,734 and the Planning Portal's service charge of £64 have been paid online using the Planning Portal payment service.

Below is a detailed description of the proposed development, a review of the planning history of the site and the assessment of the compliance of the development with Camden's development plan policies.

### **Background of project**

No.27 is currently occupied by an office, whilst No.26 is a vacant former warehouse/office building with a lawfully implemented, but not developed, planning permission for its demolition and its replacement with a single family house.

The applicant's objective is to extend the capacity of the existing office at 27 King's Mews by erecting a new office at No.26 and linking them internally with lateral connection. This will allow the creation of more job opportunities in the Central Activity Zone and ensure the long-term viability and sustainability of the existing businesses.

For this reason, the applicant is seeking permission to build a new office building instead of the approved house.

As detailed in the sections below, this would comply in full with Camden's key planning policies on land use, design, traffic and residential amenity.

### **Site and surrounding area**

26 King's Mews is a vacant two-storey warehouse building with a central pitched roof and a brick-built facade. 27 King's Mews is a four-storey plus basement office building built with facing yellow bricks and the fourth floor set back from the facade and clad with dark metal panels.

King's Mews is parallel to Gray's Inn Road to the west of it and links Theobalds Road to the south with Northington Street. King's Mews includes a mix of light-industrial, office and residential mews buildings ranging from two to four storeys in height and is within the Bloomsbury Conservation Area.

## Site designations

- Central Activities Zone (CAZ)

## Heritage designations

- Bloomsbury Conservation Area
- Archaeological Priority Area

## Other site designations

- Public Transport Accessibility Level 6b (Best)
- Flood Risk Zone 1 (Low probability of flooding)

## Planning history (excluding minor works and variation/discharge of conditions)

26, 27 and 28 King's Mews	
N15/7/B/14176	<i>The erection of a two-storey building at Nos. 27 and 28 King's Mews, Holborn, for use as storage accommodation with a leading bay, and for minor alterations to the external appearance of a building now in course of erection at No.26 King's Mews, Holborn. - Permission GRANTED</i>

26 King's Mews	
2012/3101/P	<i>Erection of a three storey dwelling house with second floor terrace (Class C3) following partial demolition of existing office/warehouse (Class B1/B8) - Application WITHDRAWN</i>
2012/3159/C	<i>Partial demolition of existing office/warehouse building (Class B1/B8) - Application WITHDRAWN</i>
2013/7847/P	<i>Erection of 3 storey 3-bedroom dwelling house with basement (Class C3), following demolition of existing office/warehouse (Class B1/B8) - Permission GRANTED</i>
2018/1609/P	<i>The demolition of part of the existing building in accordance with section 56(4) of the Town and Country Planning Act 1990 constituting a material operation for commencement of planning permission 2013/7847/P dated 13/02/2015 - Certificate of Lawfulness GRANTED</i>

27 King's Mews	
2011/5635/P	<i>Demolition of existing warehouse (Class B1/B8) and erection of a four storey 4 bedroom dwelling house with basement level (Class C3) - Application WITHDRAWN</i>
2011/5740/C	<i>Demolition of existing warehouse (Class B1/B8) and erection of a four storey 4 bedroom dwelling house with basement level (Class C3) - Application WITHDRAWN</i>
2012/3126/C	<i>Partial demolition of existing office/warehouse building (Class B1/B8) - Application WITHDRAWN</i>

27 King's Mews	
2012/3125/P	Erection of a three storey dwelling house with second floor terrace (Class C3) following partial demolition of existing office/warehouse (Class B1/B8) - Application WITHDRAWN
2013/1002/P	Erection of a three storey plus basement dwelling house with second floor terrace (Class C3) following partial demolition of existing office/warehouse (Class B1/B8) - Permission GRANTED
2013/2081/C	Partial demolition of existing office/warehouse building (Class B1/B8) - Permission GRANTED
2015/6893/P	Erection of a three to four storey plus basement building comprising 3x flats with 2nd and 3rd floor floor terraces (Class C3) following demolition of existing office/warehouse (Class B1/B8) - Application WITHDRAWN
2016/3843/P	Erection of a three to four storey plus basement office building (Class B1) with 2nd and 3rd floor terraces following demolition of existing office/warehouse (Class B1/B8) - Permission GRANTED

## Proposed development

The proposal involves the demolition of the existing vacant and dilapidated warehouse building at 26 King's Mews and its replacement with a part three, part four-storey building with basement complementing the height and design of the existing office building at 27 King's Mews. The top floor of the new building at No.26 will join the existing top floor of No.27 and will have a matching flat roof and metal cladding, but will be set back further from the front elevation and will extend laterally by approximately half of the width of the plot.

The two buildings will be linked together through internal lateral connections to form a single office building accessed from No.27. A separate door at No.26 will give access to the server room of the new and enlarged office.

The existing Gross Internal Area (GIA) of the office building at 27 King's Mews is 299 m<sup>2</sup>. Following the erection of the new building at No.26 and the amalgamation of the two buildings, the new enlarged office will have a total GIA of 611 m<sup>2</sup>.

The Design and Access Statement submitted with this full planning application contains further details of the site's urban context and of the proposed design.

## Planning policy framework

In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the development plan, unless other material considerations indicate otherwise.

The Development Plan for the site currently comprises the Camden Local Plan 2017 (CLP) and the London Plan 2021(LonP).

The following planning policy documents are also relevant for the assessment of the proposed development:

- National Planning Policy Framework 2023 (NPPF);

- Bloomsbury Conservation Area Appraisal and Management Strategy (2011);
- Camden's Design CPG (2021);
- Camden's Basement CPG (2021);
- Camden's Amenity CPG (2021);
- Camden's Developer Contributions CPG (2021);
- Camden's Employment Sites and Business Premises CPG (2021);
- Camden's Transport CPG (2021); and
- Camden's Water and Flooding CPG (2021)

Below is a summary of the relevant planning policy considerations that should be taken into account in assessing the proposed development. The key planning policies of the local development plan are listed in Appendix A of this document.

### **Planning assessment**

- Land use - Reprovision of employment floorspace and amalgamation of two office buildings;
- Massing, design and layout of the proposal;
- Impact of development on local townscape and designated heritage assets;
- Basement impacts;
- Residential amenity; and
- Transport and traffic

#### ***Land use - Reprovision of employment floorspace and amalgamation of two office buildings***

Camden's planning policies are strongly supportive of proposals which seek to expand the business offer within the Central Activities Zone and both Policies E1 and E2 of the Camden Local Plan 2017 encourage the concentration of professional services and small and medium-sized enterprises in the borough. The intensification of existing business uses is also supported, subject to an increase in employment floorspace and higher level of employment-generation.

Having analysed the planning history of King's Mews it is apparent that the Council has been consistently supportive of the principle of replacing existing business and employment floorspace with new and larger premises of higher quality, and that, on the planning balance, it afforded the same level of support to employment-focussed proposals or alternative proposals for the replacement of business premises with new housing.

For these reasons, it is considered that the principle of replacing the existing low-quality and low-intensity business use with a larger office that meets the current quality standards of workplaces should be welcomed by the Council and would align in full with the objectives of the Camden Local Plan 2017.

For the same reasons that support the principle of expanding business floorspace on site, it is considered that the proposal to amalgamate the existing office building at 27 King's Mews with the new building at no.26 to create a single office would align with the Council's policies on employment premises and economic development.

The consolidation of two buildings into one will create larger floor plans and increase the market resilience of the property, allowing the subdivision of the building for occupation by smaller companies or internal flexible arrangements that would future-proof the rentability of office space and facilitate high levels of occupancy, thus in turn increasing the employment-generation performance of the site.

### ***Massing, design and layout***

The project architect has analysed in detail the urban grain of King's Mews and the precedents set by recent planning approvals and developments currently under construction in the road.

The proposed massing of the plot at 26 King's Mews will replicate that of the existing building at No.27, but with a more contained and recessed third floor which would step back from the front, rear and side boundaries of the site.

This disposition of volumes will ensure that the new building will blend with the existing one and preserve the visual hierarchies of the mews, whilst also minimising the visual impact of the top floor on the adjoining properties to the east.

The architectural language of the new structure will complement the materiality, pattern and detailing of the existing office at No.27, creating a visual and formal consistency that will be beneficial to the character of the site and its relationship with the surrounding context.

The vertical alignment of the existing and new fenestration, combined with the use of bricks and cladding on top, will respect the appearance of the mews and reinforce its mixture of commercial and residential buildings.

The detailed design considerations that informed the approach chosen for this project are explained in full in the Design and Access Statement supporting this submission.

We consider that the proposal will be respectful of the surrounding environment and will blend seamlessly in the local townscape, and propose a high-quality architectural response to the constraints of the site, in full alignment with Policies D3 and D5 of the London Plan 2021 and Policy D1 of Camden Local Plan 2017.

### ***Townscape and heritage impacts***

As noted in the committee report of application ref. 2013/7847/P the building at 26 King's Mews was, as of December 2013, in a very poor condition. The building's structural integrity has worsened, there is no insulation or heating and the roof is of asbestos corrugated sheet. The demolition of the building and its replacement with a new building complementing the massing and design of 27 King's Mews will be a significant improvement on the current conditions and will have a positive impact on the appearance and significance of the Bloomsbury Conservation Area.

Due to the contained dimensions of the new building, there will not be visual impacts on the local street scene or on the appreciation of buildings in the vicinity. The massing and alignments of the combined office buildings will match those of all the other buildings in the mews and will reinforce their specific urban character.

The Heritage Impact Assessment supporting the application concludes that *"the replacement building has been designed responsively and will improve the overall aesthetic appearance and architectural quality of the street frontage, and the overall effect on the character and appearance of the conservation area is therefore considered to be neutral"* and that *"in conclusion, there would be preservation for the purposes of the decision maker's duty under Section 72 of the Planning (Listed Building and Conservation Area) Act 1990 and the proposals are found to comply with local planning policies and guidance"*.

The conclusions of the Archaeological Desk Based Assessment accompanying the application are as follows:

*"Based on the information within the HER, supplemented by historic mapping, the Site is considered to have low potential for archaeological remains predating the medieval period and high potential for remains associated with later land use and the construction of Kings Mews during the late 17th century, particularly structural remains associated with previous terrace housing.*

*The significance of any remains predating the post medieval period is generally considered to be low to medium, depending on their nature and extent. Remains dating to the post medieval period, while more likely to be present, are anticipated to be of low significance.*

*The construction of the current and former buildings on the Site is considered likely to have at least partly truncated any earlier archaeological remains, although there is a higher survival potential for structural remains dating from the late 17th century.*

*Although no assets are recorded within the Site on the GLHER, cartographic evidence shows that the location was occupied by terraced housing from the late 17th century onwards, until their demolition in the later 20th century. As such, it is considered that the proposed development has the potential to have an impact on buried archaeological remains, most likely on any related to said terraced housing. However, there is no evidence to suggest that if archaeological remains are present that they would be so rare or complex that they would prohibit development proposals.*

*The scope of any further archaeological works that would be needed in advance or during development of the Site would need to be discussed and agreed with the Archaeological Advisor to the local planning authority."*

For these reasons, we consider that the proposal will comply in full with Policy HC1 of the London Plan 2021 and Policy D2 of the CLP 2017.

### **Basement impacts**

The property at No.26 does not have any architectural merit and does not have a rear garden or trees within the site boundary. Similarly to the adjoining properties, 26 King's Mews has the advantage of occupying the whole surface of the site and has a regular shape that facilitates standard construction methods, including basement excavation. We would suggest therefore that the creation of a basement level at No.26 should not create any issue in principle, as demonstrated also by the fact that the residential development approved in 2015 included a basement.

The full planning application is supported by a Basement Impact Assessment covering matters relating to structural soundness of the basement, impacts on the adjoining properties, drainage and flood risk, and the management of the building site during the construction process. The BIA conclusions are as follows:

*"Considering the ground and groundwater conditions, groundwater flow direction and construction formation levels there will be negligible impact or cumulative impact to the wider hydrogeological environment. During construction, localised groundwater control will be adopted to maintain stability.*

*The site and the adjacent properties have not been impacted by flooding and there is a reported very low risk from all sources. The SuDS strategy and flood risk assessment indicates the proposed basement does not impact the wider hydrological environment.*

*There will be no impact to slopes due to the proposed development. The main site is level and is not situated in a wider hillside environment of slopes of 7° or more.*

*Ground movements caused by the excavation and construction of the proposed development will be minimal. Damage impact to adjacent structures is assessed to be a maximum of Very Slight (Category 1 in accordance with the Burland Scale) with impact to the highway and underlying utilities assessed to be negligible.*

*It is recommended that structural movement monitoring is undertaken and mitigation actions implemented if movement trends indicate structural tolerances could be exceeded. The BIA demonstrates that the proposed development will not cause adverse impacts relating to land stability, hydrogeology and surface water flow, and is at very low risk of flooding."*

### **Residential amenity**

The massing of the new building at 26 King's Mews will match that of 27 King's Mews at ground, first and second floor levels. The recessed third floor of the new building will occupy approximately half of the width of the plot and will be set back further from the front elevation than the mansard of No.27.

This will ensure that there will not be worse impacts on the daylight and sunlight levels reaching the properties to the east on Gray's Inn Road than those created by the existing building at No.27, which was consented under planning permission reference 2016/3843/P.

The conclusions of the Daylight and Sunlight Report supporting this application are as follows:

*"We have run the assessment in the existing vs proposed scenario. The results of the assessment confirm that the properties at 1, 2 and 4 King's Mews achieve the guideline values for daylight and sunlight. Reductions beyond the guidelines are identified to the neighbouring property at 41-47 Gray's Inn Road. The majority of the reductions are to windows and rooms on the ground floor which are situated underneath balconies and overhangs.*

*We have also run the assessment in the existing vs consented scenario to consider the results for the current proposals against the massing which is already consented for the site. For the neighbouring*



*properties at 1, 2 and 4 King's Mews, the results for the proposed scheme are consistent with those for the consented scheme. For 41-47 Gray's Inn Road, the results for the majority of the windows and rooms assessed are comparable.*

*In conclusion, the layout of the proposed development follows the BRE guidelines and will not significantly reduce sunlight or daylight to existing surrounding properties. In our opinion Camden's planning policy on daylight and sunlight to neighbouring properties will be satisfied."*

The mutual distance between the windows of the office at No.26 and the windows of the properties to the east of the site will be the same as that of the windows of No.27 and the properties on Gray's Inn Road, and will be comparable to similar tight urban context within Camden. Furthermore, the windows at the rear will be frosted up to 1.7 metres above finished floor level. It is therefore submitted that the proposal will be compliant with Policy A1 of the Camden Local Plan 2017.

### ***Energy and sustainability***

The application is supported by an Energy Statement setting out the measures proposed in the construction and operation of the building to meet the requirements of the policies of the Camden Local Plan and of the London Plan on energy and sustainability and meet the requirements of the Building Regulations.

### ***Transport and traffic***

The development will be car-free, in accordance with Policy T2 of the CLP.

The proposal will result in a net increase of 309 m<sup>2</sup> of office space on site. The proposed development includes a dedicated and secure cycle storage providing four cycle parking spaces for the new office wing at No.26 King's Mews, in line with the standards set out in the London Plan (1 space every 75 m<sup>2</sup> of new office floorspace).

The refuse produced by the office will be collected internally and positioned in the mews on collection days, as per the current arrangements of the office at 27 King's Mews.

### ***Fire safety***

The application is supported by a Fire Statement demonstrating how the proposed development will comply with the requirements of Policy D12 of the London Plan 2021.

### **Conclusions**

The submitted proposal will replace a redundant warehouse in very poor structural condition with a contemporary office building linked to the existing office building at 27 King's Mews.

The amalgamation of the two buildings will increase the amount of office space available to small and medium companies in the CAZ and diversify the offer of flexible office space in Camden. This will align in full with the Council's economic objectives set out in the Camden Local Plan.

The proposed building at No.26 will have the same number of floors, volumes and materiality of the existing building at No.27. The new combined office will respect the character and appearance of King's Mews and improve the significance of the Bloomsbury Conservation Area by removing an unsightly vacant warehouse of no architectural merit.

The proposal will not have any negative impact on residential amenity and the application is supported by technical reports demonstrating that the construction and use of the proposed basement at No.26 will preserve the structural integrity of the surrounding buildings, the permeability of the area and the amenity of adjoining properties.

For the reasons set out above and in other parts of this letter, we submit that the development would be in accordance with the policies of the local development, regional and national planning policies and that full planning permission should be granted without delay.

If you have any queries, please do not hesitate to contact Lorenzo Pandolfi of this office at [lorenzo@logic-planning.com](mailto:lorenzo@logic-planning.com) or 07825 471559.

Yours faithfully,

**L . P .**

Logic Planning (part of Planning Communications Ltd)  
[info@logic-planning.com](mailto:info@logic-planning.com)

## APPENDIX A - KEY PLANNING POLICIES

### *Land use - Reprovision of employment floorspace and amalgamation of two office buildings*

Policy E1 of the Camden Local Plan 2017 relates to economic development. It reads as follows:

*The Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. We will:*

- a. support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;*
- b. maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;*
- c. support local enterprise development, employment and training schemes for Camden residents;*
- d. encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;*
- e. support the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan;*
- f. direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031;*
- g. support Camden's industries by:*
  - i. safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;*
  - ii. supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites;*
  - iii. safeguarding the Kentish Town Industry Area;*
  - iv. promoting and protecting the jewellery industry in Hatton Garden;*
- h. expect the provision of high speed digital infrastructure in all employment developments; and*
- i. recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.*

Policy E2 of the Camden Local Plan 2017 relates to employment premises and sites. It is reproduced in full below.

*The Council will encourage the provision of employment premises and sites in the borough. We will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy.*

*We will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction:*

- a. the site or building is no longer suitable for its existing business use; and*
- b. that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.*

*We will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided that:*

- c. the level of employment floorspace is increased or at least maintained;*
- d. the redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or the local economy;*
- e. it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy and will be to a sustainable location;*
- f. the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;*
- g. the scheme would increase employment opportunities for local residents, including training and apprenticeships;*
- h. the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and*
- i. for larger employment sites, any redevelopment is part of a comprehensive scheme.*

### ***Massing, design and layout***

The NPPF stresses the importance of achieving high quality design in all developments, the more so when heritage assets might be affected.

**Paragraph 135 of the NPPF** sets out six specific requirements to achieve the objective of creating well-designed places. These include the need for developments to function well and add to the overall quality of the area over the lifetime of the development and to be visually attractive as a result of good architecture, layout and appropriate and effective landscaping.

At paragraph (c) it is stated that developments need to be sympathetic to local character and history, including the surrounding built environment, and that appropriate innovation and change (including increased densities) should not be discouraged or prevented where appropriate.

Paragraph (d) states that new developments should establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.

**Paragraph 139 of the NPPF** states that significant weight should be given to development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.

**Policy GG2C of the London Plan** states that to create successful sustainable mixed-use places that make the best use of land decision-makers should *“proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”*.

**Paragraph D** of the same policy requires decision-makers to apply *“a design-led approach to determine the optimum development capacity of sites”*.

**Policy D3 of the London Plan** states that *“all development must make the best use of land by following a design led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site”*.

In relation to form and layout, Policy D3 of the London Plan states that development proposals should *“enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions”*.

Policy D3 also requires developments *“to be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well”*.

**Policy D5 of the London Plan** states that development proposals should achieve the highest standards of accessible and inclusive design.

**Policy D1 of the Camden Local Plan 2017** lists several detailed design principles that should be followed when designing new developments in the borough. It states that:

*The Council will seek to secure high quality design in development. The Council will require that development:*

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
- c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d. is of sustainable and durable construction and adaptable to different activities and land uses;*
- e. comprises details and materials that are of high quality and complement the local character;*
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*

- g. *is inclusive and accessible for all;*
- h. *promotes health;*
- i. *is secure and designed to minimise crime and antisocial behaviour;*
- j. *responds to natural features and preserves gardens and other open space;*
- k. *incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- l. *incorporates outdoor amenity space;*
- m. *preserves strategic and local views;*
- n. *for housing, provides a high standard of accommodation; and*
- o. *carefully integrates building services equipment.*

*The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.*

### ***Townscape and heritage impacts***

**Paragraph 205 of the NPPF** states that great weight should be given to the conservation of a designated heritage asset when considering the impact of a proposed development on its significance. Paragraph 200 requires that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.

The NPPF requires the impact on the significance of designated heritage assets (listed buildings and conservation areas) to be considered in terms of either “substantial harm” or “less than substantial harm” as described within Paragraphs 207 and 208 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.

**Paragraphs 207 and 208 of the NPPF** refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefits. Paragraph 207 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified, paragraph 208 requires this harm to be weighed against the public benefits of the proposed development.

**Policy HC1 of the London Plan 2021** 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 in the design process.

**Policy D2 of the CLP** states, among other things, that “*in order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas*” and that the Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.

## **Basement impacts**

Policy A5 of the CLP is dedicated specifically to basements. It states the following:

*The Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:*

- a. neighbouring properties;*
- b. the structural, ground, or water conditions of the area;*
- c. the character and amenity of the area;*
- d. the architectural character of the building; and*
- e. the significance of heritage assets.*

*In determining proposals for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.*

*The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:*

- f. not comprise of more than one storey;*
- g. not be built under an existing basement;*
- h. not exceed 50% of each garden within the property;*
- i. be less than 1.5 times the footprint of the host building in area;*
- j. extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;*
- k. not extend into or underneath the garden further than 50% of the depth of the garden;*
- l. be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and*
- m. avoid the loss of garden space or trees of townscape or amenity value.*

*Exceptions to f. to k. above may be made on large comprehensively planned sites.*

*The Council will require applicants to demonstrate that proposals for basements:*

- n. do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';*
- o. avoid adversely affecting drainage and run-off or causing other damage to the water environment;*
- p. avoid cumulative impacts;*
- q. do not harm the amenity of neighbours;*
- r. provide satisfactory landscaping, including adequate soil depth;*
- s. do not harm the appearance or setting of the property or the established character of the surrounding area;*

- t. *protect important archaeological remains; and*
- u. *do not prejudice the ability of the garden to support trees where they are part of the character of the area.*

*The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.*

*We will generally require a Construction Management Plan for basement developments.*

*Given the complex nature of basement development, the Council encourages developers to offer security for expenses for basement development to adjoining neighbours.*

### ***Residential amenity***

**Policy D3 of the London Plan 2021** states that new developments should deliver appropriate outlook, privacy and amenity and help prevent or mitigate the impacts of noise and poor air quality.

**Policy A1 of the CLP** states that *"the Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity".*

### ***Transport and traffic***

**Paragraph 114 of the NPPF** states that decision makers should ensure that the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code.

**Paragraph 115 of the NPPF** specifies that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

**Paragraph 116 of the NPPF** states that applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.



**Policy T1 of the London Plan** states that all developments should make the most of effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impact on London's transport networks and supporting infrastructure are mitigated.

**Policy T5 of the London Plan** states that developments need to include appropriate levels of cycle parking which should be fit for purpose, secure and well-located. For office developments in Camden the London Plan requires the provision of 1 long-stay cycle parking space every 75 m<sup>2</sup> of new floorspace and 1 short-stay cycle parking space per 500 m<sup>2</sup> of new floorspace.

**Policy T1 of the Camden Local Plan** states that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

**Policy T2 of the CLP** states that the Council will limit the availability of parking and require all new developments in the borough to be car-free.

**APPENDIX B - PRE-APPLICATION ADVICE LETTER REF. 2023/1265/PRE**



**Planning Solutions Team**  
**Planning and Regeneration**  
 Culture & Environment  
 Directorate  
 London Borough of Camden  
 2<sup>nd</sup> Floor  
 5 Pancras Square  
 London  
 N1C 4AG

**Date: 07/09/2023**  
**Our ref: 2023/1256/PRE**  
**Contact: Daren Zuk**  
**Direct line: 020 7974 3386**  
**Email: Daren.Zuk@camden.gov.uk**

Logic Planning  
 92 Lordship Park  
 London  
 N16 5UA

[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Dear Lorenzo Pandolfi,

**Re: 26-27 King's Mews, London, WC1N 2JB**

Thank you for submitting a pre-planning application enquiry for the above property. The required fee of £1,138.09 was received on 24/03/2023.

### 1. Proposal

The proposal is for:

- Demolition of the existing office/warehouse building (Class E/B8) at no.26;
- Erection of part three/part four-storey office building (Class E) with basement; and
- Amalgamation of no.26 with existing office building at no.27.

### 2. Site Description

The application site at no.26 Kings Mews is a two-storey building located on the eastern side of King's Mews, to the north of the junction with Theobald's Road. This site is located within the Bloomsbury Conservation Area and has an existing lawful use as offices/storage (Class E). No.27 King's Mews is a part three/part four-storey office building located adjacent to no.26, permitted under ref. 2016/3843/P (dated 23/03/2017). It has an existing lawful use as offices (Class E). The eastern side of King's Mews were traditionally office, storage, and light industrial uses, located in older buildings two-stories in height, and of varied ages. Many of these older buildings have been demolished over the years and rebuilt with taller office and residential accommodation.

### 3. Relevant Planning History

#### 26 King's Mews

**2013/7847/P** – Erection of 3 storey 3-bedroom dwelling house with basement (Class C3), following demolition of existing office/warehouse (Class B1/B8). **Granted 13/02/2015 (not implemented)**

**2016/1461/P** – Installation of garage door and alterations to windows to front elevation to office/warehouse building. **Granted 12/05/2016**

**2018/1609/P** – The demolition of part of the existing building in accordance with section 56(4) of the Town and Country Planning Act 1990 constituting a material operation for commencement of planning permission 2013/7847/P dated 13/02/2015. **Granted 25/05/2018**

**2020/4862/PRE** – The proposal is for the demolition of the existing two storey office building and erection of a four storey plus basement building to provide three flats. **Advice Issued 29/11/2022**

#### 27 King's Mews

**2013/1002/P** – Erection of a three storey plus basement dwelling house with second floor terrace (Class C3) following partial demolition of existing office/warehouse (Class B1/B8). **Granted 24/12/2013**

**2013/2081/C** – Partial demolition of existing office/warehouse building (Class B1/B8). **Granted 24/12/2013**

**2016/3843/P** – Erection of a three to four storey plus basement office building (Class B1) with 2nd and 3rd floor terraces following demolition of existing office/warehouse (Class B1/B8). **Granted 23/03/2017**

**2017/6484/P** – Amendments to planning permission ref: 2016/3843/P dated 15/09/2016 for erection of a 3 to 4 storey plus basement office building with 2nd and 3rd floor terraces following demolition of existing office/warehouse namely addition of lift overrun. **Granted 13/12/2017**

#### 28 King's Mews

**2013/1368/P** – Erection of a 4-storey building with basement with terraces at front second and third floor levels to provide maisonette at 1<sup>st</sup>-3<sup>rd</sup> floor levels (Class C3) and office/warehouse use at ground and basement levels (Class B1/B8) following the demolition of the existing building (Class B1/B8). **Refused 01/08/2013 but Allowed at Appeal 05/09/2014**

**2017/4562/P** – Erection of a four storey plus basement dwelling. **Granted 10/08/2018**

## **4. Relevant Policies and Guidance**

### **The National Planning Policy Framework 2021**

### **The London Plan 2021**

### **Camden Local Plan 2017**

- G1 Delivery and location of growth
- A1 Managing the impact of development
- A4 Noise and vibration
- A5 Basements
- E1 Economic development
- E2 Employment premises and sites
- D1 Design
- D2 Heritage
- T1 Prioritising walking, cycling and public transport
- T2 Parking and car-free development

### **Camden Planning Guidance (2021)**

- CPG (Design)
- CPG (Amenity)

CPG (Basements)

## **Bloomsbury Conservation Area Appraisal and Management Strategy (2011)**

### **5. Assessment**

The planning considerations material to the determination of this application are as follows:

- Procedure and Background
- Land Use
- Design and Heritage
- Basement Considerations
- Amenity
- Transport
- Planning obligations/CIL

### **6. Procedure and Background**

The lawful development certificate ref. 2018/1609/P confirms the implementation of ref. 2013/7847/P. This extant permission established the principle of demolition and therefore it is not necessary to justify the demolition of the building from a resource efficiency perspective. However, all other aspects of the proposed scheme must be assessed under current Local Plan Policy.

### **7. Land Use**

#### *Existing*

The existing building is currently used as offices under Use Class E.

#### *Proposed*

Policy E1 of the Local Plan seeks to support businesses of all sizes, in particular start-ups, small, and medium sized enterprises. The policy further supports Camden's industries by supporting proposals for intensification of employment sites and premises where they provide additional employment and other benefits in line with Policy E2.

Policy E2 encourages the provision of employment premises and sites in the borough, including proposals that include floorspace suitable for start-ups, small and medium sized enterprises such as managed affordable workspace.

The new expanded office building would be used in combination with the existing neighbouring offices at no.27, thus creating one large building for a single end user. Therefore, the provision for the expanded office building (Class E) in this location is welcomed and complies with Policies E1 and E2 of the Local Plan.

### **8. Design and Heritage**

#### Demolition of Existing Building

The existing building is a modern structure of no architectural or historic merit, nor is it noted in the Conservation Area Appraisal as being a positive contributor. Therefore, there is no objection to its demolition. Further, the lawful development certificate ref. 2018/1609/P

confirms the implementation of ref. 2013/7847/P, which permitted and established the principle of demolition of the existing building.

### Design & Heritage

Under ref. 2013/1368/P, the addition of a fourth storey, set back from the main elevation, was initially refused by the Council but allowed on appeal. The Inspector considered that the scheme would represent a high standard of design and noted that the Council had previously approved a larger comprehensive scheme of a similar height. A part three/part four storey building has also been approved and constructed at no.27. The principle of a three to four storey building has therefore been established and is considered acceptable subject to high quality detailed design.

The overall mews frontage is acceptable in that it does not replicate but matches the design and fenestration of neighbouring no.27. It is considered that the zinc clad top stories at nos.27-28 are not examples which should be directly replicated. These zinc boxes show little response to the rest of the elevation. The materials and detailing on the fourth floor should relate to the lower floors of the building and should respond to the character of the mews.

In conversations with officer, the design of the mews frontage has evolved and now features more unique fenestration than previously proposed. The building now complements and matches the design of the neighbouring buildings without replicating them exactly. The facade is clad in slim light-coloured brick, with pilasters at the building edges, middle and separating each floor. The windows and doors are full height and modern in appearance, with Juliet style balconies at first floor. The second floor, which is set back from the first-floor roof edge, features the same design detail. It is noted that the original proposal included a glass balustrade at fourth floor level, which was not supported. The revised scheme removed the balustrade and replaced with a solid parapet wall, which is considered acceptable.

At the rear, which is not visible from any public views, replicates those of neighbouring buildings in a simple and modern design. Further details on the facade materiality should be submitted with any future application.

Although the application site sits within the Bloomsbury Conservation Area, there is little original fabric along King's Mews retained. Many of the modern, 20<sup>th</sup> century buildings have been replaced in the last 20 years thus changing its character. Many of the replacement mews buildings feature unique design and character, often referencing the previous use of the area as industrial / residential ancillary mews. Any future application should aim to reference this historic relationship and incorporate finer detailed design elements that acknowledge this history.

It is noted that there are no external alterations proposed to no.27, and the only interior alterations include internal openings at ground, first, and second levels to connect the two buildings. This is considered acceptable, as each of the two buildings could be easily re-adapted into self-contained offices in the future.

## **9. Basement Considerations**

Policy A5 states that the Council will only grant permission for basements where it is demonstrated that no harm will be caused to:

- a. neighbouring properties;
- b. the structural, ground, or water conditions of the area;
- c. the character and amenity of the area;

- d. the architectural character of the building; and
- e. the significance of heritage assets.

The Council may require an update to the previously submitted Basement Impact Assessment (BIA) so that officers can properly assess whether any harmful impact will result from the basement excavation. This is because basement related planning policy has changed since the 2013 permission. The previous development plan tolerated up to a Burland Scale of category 2 damage (slight) to neighbouring properties, however, the current Local Plan (2017) Policy A5 requires a Burland Scale of 1 (very slight) damage to neighbouring properties. The BIA for the 2013 application does not appear to ascribe a Burland Scale damage category, however, it does state that the residual impacts would be 'neutral or be minor significance'. It would need to be confirmed that the basement impact would be a Burland Scale of 1. It may also be required to submit a ground movement analysis and building damage survey to demonstrate compliance.

The site conditions have changed with numerous basements constructed at nearby properties. This can result in cumulative damage to neighbouring properties, the structural, ground, or water conditions of the area, and the architectural character and heritage significance of the building and area. See para. 4.34 of CPG Basements for further information. This may need to be accounted for within an updated BIA or an addendum to the existing BIA. The standard BIS stages include the following:

- Stage 1 – Screening
- Stage 2 – Scoping
- Stage 3 – Site investigation and study
- Stage 4 – Impact assessment

An updated BIA would have to be independently assessed by the Council's preferred third-party engineer, Campbell Reith, with the cost covered by the applicant. Once an application has been submitted, further details of the independent verification process will be provided.

The siting, location, scale, and design of the basement must have minimal impact on, and be subordinate to, the host building and property. CPG Basements Table 1 sets out criteria (f. to m.) regarding the size of basements. The proposed basement would be the same size as the basement approved in 2013 and is considered to comply with those criteria.

## **10. Amenity**

The proposed office space (Class E) is considered compatible with the existing commercial and residential uses along King's Mews and Gray's Inn Road and is unlikely to result in impacts to residential amenity in terms of noise.

A daylight/sunlight assessment would be required to demonstrate compliance with BRE standards and that the proposal would not have an adverse impact on the properties to the rear on Gray's Inn Road. The rear elevation would appear to have less than 18m distance to the rear facing windows of buildings on Gray's Inn Road. This is below the minimum distance recommended in CPG Amenity (2021) to protect neighbouring occupier's privacy. Therefore, the rear windows would need to be obscure glazed, in order to protect overlooking impacts to those properties.

A degree of mutual overlooking between the proposed fourth floor terrace and the existing terraces at nos. 27 and 28 is considered acceptable, without the need for a privacy screen. The terrace would not give rise to harmful overlooking of habitable rooms to other properties on King's Mews. However, it is considered that the rear of the fourth-floor terrace could give

rise to overlooking impacts to those properties on Gray's Inn Road. It is suggested that a privacy screen be included along the rear portion of the roof terrace in any future application.

## **11. Transport Considerations**

In line Policy T1, it is expected cycle parking at developments to be provided in accordance with the standards set out in the London Plan. The requirement for offices is 1 space per 75 sqm for long stay and 1 space per 500 sqm for short stay. As the new building will have a floor area of 309 sqm, this gives a requirement for 4 long stay spaces. The submitted ground floor plan shows 4 cycle parking spaces in a store at the rear of No. 26, which meets the required standard for the new building. It is recommended that Sheffield or M-shaped stands be used in the store to provide added levels of security. The provision (but not design) of the cycle parking should be secured by condition.

In accordance with Policy T2, the development will be secured as on-street Business parking permit free by means of a S106 Agreement. This will prevent the future occupants from adding to existing on-street parking pressures, traffic congestion and air pollution whilst encouraging the use of more sustainable modes of transport such as walking, cycling and public transport. No off-street parking is currently provided, and none is proposed.

Given that the current proposals comprise the complete demolition of the existing building, the excavation of a full footprint basement, and the construction of a part three/part four-storey building within the Central London area, it is considered that a Construction Management Plan and associated Implementation Support Contribution of £4,075.60 and Impact Bond of £7,874 should be secured by means of the S106 Agreement.

As the proposals comprise the excavation of a basement directly adjacent to the public highway, an Assessment in Principle (AIP) and associated fee of £576.80 will also need to be secured via the S106 to ensure that the structural stability of the highway is maintained throughout the excavation and construction process.

A highways contribution may also be necessary from this development, this will be confirmed at the application stage.

## **12. Planning Obligations**

The following Section 106 planning obligations may be required if planning permission were granted:

- Car-free development
- Construction Management Plan and Implementation Support Contribution of £4,075.60
- Impact Bond of £7,874.00
- Assessment in Principle £576.80

## **13. Summary & Planning Application Information**

The erection of part three/part four-storey (Class E) office building with basement is supported in principle subject to the comments and conditions described above.

Should you choose to submit a planning application which addresses the outstanding issues detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:



- Completed form – Full Planning Application
- An Ordnance Survey-based location plan at 1:1250 scale denoting the site in red
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Planning Statement
- Design, Access, and Heritage Statement
- Basement Impact Assessment
- Daylight/Sunlight Assessment
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a notice on or near the site and advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received. You are advised to contact your neighbours to discuss the proposals.

Non-major applications are typically determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

If you have any queries about the above letter or the attached document, please do not hesitate to contact Daren Zuk on **020 7974 3386**.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Daren Zuk

**Senior Planning Officer  
Planning Solutions Team**