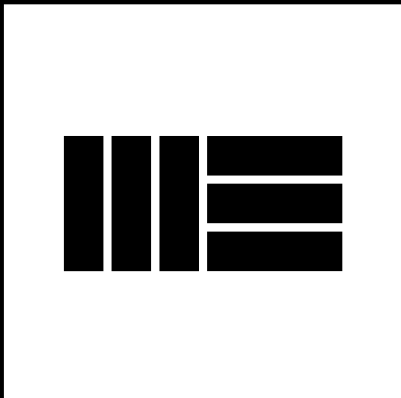


**9 NORTHINGTON STREET,  
LONDON, WC1N 2JF**

**PLANNING STATEMENT**

MARCH 2024

PD15065/PJB/JH/EM



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# 1.0 EXECUTIVE SUMMARY

- 1.1 This Planning Statement forms part of the application for planning permission and listed building consent submitted on behalf of MHL BUILD LTD (“the Applicant”) for the change of use from office (Use Class E) to residential (Use Class C3) and associated internal and external alterations at no. 9 Northington Street, Bloomsbury, London, WC1N 2JF (“the Site” / “the Building”), to provide 4 self-contained residential units (**Section 2.0**).
- 1.2 The Site is located on Northington Street within the London Borough of Camden. The Building is connected to 9 John Street by a rear internal link to no. 9 John Street, which is a Grade II listed building, as such, no. 9 Northington Street is curtilage listed. The Site is also located within the Bloomsbury Conservation Area (**Section 3.0**).
- 1.3 The proposed description of development is as follows (“Proposed Development” / “Proposals”) (**Section 4.0**):
- “Change of use of no. 9 Northington Street from office (Class E) to residential (Class C3) to form four self-contained dwellings, including associated internal and external alterations including introduction of windows to rear elevation and subdivision from 9 John Street”.*
- 1.4 The Building is in Class E use and has recently been used as office accommodation. However, the office accommodation is poor quality and not meeting modern standards, as such, the Site has been completely vacant since April 2023, although most floors have not been occupied since 2020. The Proposals for conversion and refurbishment ensure that the Site is brought back into use, through the creation of four self-contained high-quality residential units (**Section 6.0**).
- 1.5 Overall, the Proposed Development is in accordance with the national regional and local planning policy, including other material considerations such as emerging policy and guidance. The Proposals would provide a number of planning benefits over and above the existing situation (**Section 7.0**).

# 2.0 INTRODUCTION

2.1 This Planning Statement (hereafter referred to as “the Statement”) has been prepared by Montagu Evans LLP to support the submission of an application for planning permission and listed building consent (referred to as “the / this Application”) for a change of use from office (Class E) to residential (Class C3) and associated internal and external alterations at no. 9 Northington Street, Bloomsbury, London, WC1N 2JF (“the Site” / “the Building”).

2.2 The Application is submitted on behalf of MHL BUILD LTD (“the Applicant”) to the London Borough of Camden (“the Council”, “Camden” or (“LBC”) as the Local Planning Authority (“LPA”).

## PLANNING APPLICATION

2.3 Full planning permission and listed building consent is sought for the following (“Proposed Development” / “Proposals”)

*“Change of use of no. 9 Northington Street from office (Class E) to residential (Class C3) to form four self-contained dwellings, including associated internal and external alterations including introduction of windows to rear elevation and subdivision from 9 John Street”.*

## PURPOSE AND FORMANT OF THE PLANNING STATEMENT

2.4 The purpose of this Planning Statement is to provide information to allow for an informed assessment of the Proposed Development against relevant national, regional, and local planning policy and other material considerations.

2.5 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the Application have been taken into account. This Statement brings together the findings of the technical reports identified below and, having regard to these, provides a balanced planning assessment of the merits of the proposals.

2.6 The scope of supporting information has been established with regard to the national and local list requirements.

2.7 A Document Schedule has been prepared for the Application. Table 2.1 confirms the project team responsible for each matter:

*Table 2.1 – List of documents submitted to Camden that form this Planning Application*

No.	Document Title	Author
01.	Completed Application Forms	Montagu Evans
02.	This Document Schedule	Montagu Evans
03.	Covering Letter	Montagu Evans
04.	Community Infrastructure Levy Form	Montagu Evans
05.	Location Plan	Studio 3 Architects
06.	Drawing Issue Sheet	Studio 3 Architects
07.	Application Drawings a. Existing Drawing Set b. Demolition Drawing Set c. Proposed Drawing Set	Studio 3 Architects
08.	Planning Statement	Montagu Evans
09.	Design and Access Statement	Studio 3 Architects
10.	Heritage Appraisal	The Heritage Practice
11.	Internal Daylight Assessment	T16 Design
12.	Noise Impact Assessment	KP Acoustics
13.	Transport Statement	Motion
14.	Construction Management Plan Pro Forma	Motion
15.	Structural Statement	Quantum Engineer

16.	Sustainability Statement	Webb Yates Engineers
17.	Loss of Employment Report	Montagu Evans
18.	Loss of Employment Report – Appendix 1 - Marketing Report	Gale Priggen & Co
19.	Photographic Room Survey	Studio 3 Architects
20.	Area Schedule	Studio 3 Architects
21.	Door and Window Schedule	Studio 3 Architects

2.8 This Planning Statement demonstrates that the overall Proposals would:

- Deliver sustainable development of a vacant, brownfield Site within Central London, in line with the overarching approach to development outlined in the NPPF;
- Ensure that the Site is brought back into an optimum use, through the creation of a high-quality residential dwellings;
- Deliver a design of high-quality architecture that would be congruous to the surrounding context, including preserving and enhancing the character and appearance of the conservation area and setting of listed buildings within the vicinity;
- Result in an enhancement to the significance of the listed building (no. 9 John Street);
- Deliver a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the Building; and
- Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development with cycle parking provision which would promote other means of travel such as cycling and walking.

2.9 **Section 3.0** of this Statement provides background information on the Site including its planning history. **Section 4.0** sets out the Proposals for the Site. **Section 5.0** summarises the planning policy relevant to the Site. The Application proposals are assessed against these policies in **Section 6.0**. A summary and conclusions are contained within **Section 7.0**.

# 3.0 SITE AND SURROUNDING AREA

## APPLICATION SITE

- 3.1 The Site is located on Northington Street within the administrative boundary of the London Borough of Camden, in the Bloomsbury area. It is situated within the southeast corner of the Borough, with the City of London just to the east and the City of Westminster to the south of the Site.
- 3.2 The Site area comprises approximately 133 sqm.
- 3.3 The Site is a mid-Victorian three storey block with a semi-basement floor (spanning Lower Ground, Raised Ground, First and Second Floor Levels) with a history of commercial use. The Site is connected to no. 9 John Street via a rear internal link, first constructed at the end of the 19<sup>th</sup> century and remodelled and extended in the 1970s.
- 3.4 The Site is curtilage listed due to its rear link to no. 9 John Street, a Grade II listed building. The listing includes nos. 2-9 John Street (8 terraced houses) noted for being built by J Blagrove with W Barlow, J Bosworth, S Room and R Meel between 1754-59. The Site is also located in the Bloomsbury Conservation Area.
- 3.5 The existing lawful use of the Site (including no. 9 John Street) is Use Class E (Commercial, Business and Service) as it was most recently used as office accommodation.
- 3.6 The office use of the Site spans a floor area of 365 sqm (GIA). The lettable space, of which there is 250 sqm, is split over 9 office units arranged around a central core. The existing office accommodation is poor quality and does not meet modern standards. As such, the Site has been vacant since April 2023.
- 3.7 A full description of the existing Building is provided within the Design and Access Statement and the Heritage Statement.

## SURROUNDING AREA

- 3.8 The Site is a commercial building fronting Northington Street, a secondary street off John Street. Northington Street runs east-west, stretching from Gray's Inn Road to Great James Street. The road is characterised by a variety of building heights, scale, massing and age. Whereas John Street is a series of mid to late Georgian terraced townhouses, generally four storeys.
- 3.9 The surrounding area is predominantly characterised by a variety of uses, such as offices, residential, hotels, diplomatic and educational buildings, owing to its central London location.
- 3.10 As set out above, the Site is located within the Bloomsbury Conservation Area which is characterised by its formally planned arrangement of streets enclosed by mainly three and four storey developments. The urban character of the broad streets is interspersed by formal squares which provide landscape dominated focal points to the area. Russell Square, Queen Square Gardens, Brunswick Square Gardens and Coram's Fields among many more, are located within close proximity to the Site.
- 3.11 The immediate surrounding area to the Site contains numerous listed buildings, most of which are terraced townhouses dating from mid-18<sup>th</sup> to early 19<sup>th</sup> century. This includes the following:
- Nos. 10-20 John Street – Grade II
  - Nos. 22-28 John Street – Grade II
  - Nos. 29-36 John Street – Grade II
  - No. 8 Northington Street – Grade II

## ACCESSIBILITY

- 3.12 The Site is located on the southern side of Northington Street which connects to Gray's Inn Road (A5200) to the east. The site benefits from close proximity to the A501 and the A40, as well as a number of bus stops and Holborn Railway Station.

- 3.13 The Site has a Public Transport Accessibility Level (PTAL) of 6b which is categorised as ‘excellent’, as it is located in close proximity to a variety of public transport routes.

#### SITE HISTORY

- 3.14 The Heritage Statement outlines that the Site was originally a house with a landscaped garden to the rear, as shown in Horwood’s map of 1799.
- 3.15 An Ordnance Survey map of 1874-75, shows that the part of the Site was built over and used as a warehouse ‘L’ shaped building, which survives today. The use was likely industrial or used as a showroom. At this point there was no physical connection between the Site and no. 9 John Street.
- 3.16 The Goad map of 1901 shows the Site was in office use and no. 9 John Street was both office and residential use. The map also shows that there is a physical connection between the buildings.
- 3.17 At some point no. 9 John Street began to be used as a newspaper office and the Site ancillary to those functions.

#### PLANNING HISTORY

- 3.18 A review of Camden’s online planning register has revealed that the Site has been subject to a number of planning applications. The most relevant are summarised in the table below and are in connection with no. 9 John Street:

*Table 3.1 – Summary of Relevant Planning History*

Planning Ref.	Application Type	Description of Development	Decision
18515	Historic Planning Application	Restoration and refurbishment of 9 John Street, WC1 with the addition of a new rear lift shaft and a lower ground floor extension and new second floor link between 9 John Street and 9 Northington Street, WC1 and the reconstruction of the existing first floor link.	Approved 22 August 1974
22237	Historic Planning Application	Alterations including the addition of a new rear lift shaft, a new second floor link between 9 John Street and 9 Northington Street, the reconstruction of the existing first floor level and a mansard roof extension to 9 Northington Street at third floor level.	Refused 26 May 1976
LS9704494	Listed Building Consent	Alterations to internal non-structural partitions.	Withdrawn 17 July 1997
2018/4025/P	Planning Permission	Erection of single storey roof extension to Northington Street elevation and installation of glazed link at roof level in association with provision of additional office floorspace (B1)	Refused 31 October 2018  Appeal Dismissed 6 September 2019
2018/4339/L	Listed Building Consent	Erection of single storey roof extension to Northington Street elevation and installation of glazed link at roof level.	Refused 31 October 2018  Appeal Dismissed 6 September 2019

#### 1970s Applications

- 3.19 An application (ref. 18515) was submitted to Camden for the “*Restoration and refurbishment of 9 John Street, WC1 with the addition of a new rear lift shaft and a lower ground floor extension and new second floor link between 9 John Street and 9 Northington Street, WC1 and the reconstruction of the existing first floor link.*” The application was approved with conditions on 22 August 1974.

3.20 In 1976, a further application (ref. 22237) was submitted which sought *“Alterations including the addition of a new rear lift shaft, a new second floor link between 9 John Street and 9 Northington Street, the reconstruction of the existing first floor level and a mansard roof extension to 9 Northington Street at third floor level.”*

3.21 The application was refused on 26 May 1976 due to *“The proposed roof extension would have an adverse effect on the appearance of the building and the visual amenity of this part of the Bloomsbury Conservation Area on view of its prominent position”*.

#### 1997 Application

3.22 An application (ref. LS9704494) for listed building consent was submitted for the alterations to internal non-structural partitions at 9 John Street and 9 Northington Street. The application was withdrawn on 17 July 1997 for unknown reasons.

#### 2018 Applications

3.23 The 2018 applications for planning permission and listed building consent sought a single storey roof extension to 9 Northington Street measuring 12.5m (width) x 7.6m (depth) x 2.85m (height) and a glazed link structure to connect 9 John Street and 9 Northington Street, measuring 2.6m (width) x 3m (depth) x 2.8m (height) at roof level, to provide an additional 86 sqm of office floorspace (Use Class B1).

3.24 During these applications, 9 Northington Street was assessed as a listed curtilage structure due to its attachment to John Street (Grade II listed terraces).

3.25 The applications were refused on 31 October 2018 by a delegated decision. The Decision Notice states the two following reasons for refusal:

1. *The proposed roof extension, by reason of its design, siting, scale and bulk, would result in an overly dominant and inappropriate addition to the roof which would be detrimental to the character and appearance of the host building, the setting of the adjacent listed terrace, and the Bloomsbury Conservation Area contrary to policies D1 and D2 of the Camden Local Plan 2017.*
2. *In the absence of a legal agreement to secure a Construction Management Plan (and associated support contribution), the proposal would fail to ensure that the development can be implemented without causing detrimental impact to residential amenity or the safe and efficient operation of the highway network in the local area, contrary to policies A1 and T4 of the Camden Local Plan 2017.*

3.26 Following this, the Applicant submitted an appeal against the decision of Camden. The appeal is referred to as:

- Appeal A – ref. APP/X5210/W/19/3227700 (relating to planning permission ref. 2018/4025/P)
- Appeal B – ref. APP/X5210/Y/19/3227702 (relating to listed building consent ref. 2018/4339/L)

3.27 Both Appeal A and Appeal B were dismissed by the Planning Inspector on 6 September 2019 on the grounds that *“the proposed roof extension would fail to preserve the special interest of the Grade II listed terrace, of which the appeal property forms a part, and have an adverse effect on its setting. It would also fail to preserve or enhance the character and appearance of the BCA [Bloomsbury Conservation Area]”*.

#### 2024 Applications

3.28 There is a live application (ref. 2024/0210/T) to notify Camden of the intended works to a tree in a conservation area, namely, to fell x1 common ash (T1) and to treat the stump to prevent regrowth. The application relates to 9 Northington Street and was validated on 18 January 2024.

3.29 This Planning Application seeks the conversion and refurbishment of 9 Northington Street from office to residential and removal of the internal link with 9 John Street. A separate application is due to be submitted in 2024 for the conversion and refurbishment of 9 John Street from office to residential.



# 4.0 DEVELOPMENT PROPOSALS

4.1 As set out in **Section 2.0** of this Statement, the Application seeks planning permission and listed building consent for the reconfiguration, internal refurbishment, external alterations and conversion of no. 9 Northington Street.

4.2 The proposed description of development is as follows (“Proposed Development” / “Proposals”):

*“Change of use of no. 9 Northington Street from office (Class E) to residential (Class C3) to form four self-contained dwellings, including associated internal and external alterations including introduction of windows to rear elevation and subdivision from 9 John Street”.*

4.3 Full details of the Proposed Development are set out within the application drawings and Design and Access Statement prepared by Studio 3 Architects which accompanies this submission.

4.4 The Design and Access Statement summarises the Proposals as follows:

- Change of use of the existing vacant office floor space to create x4 high quality residential apartments totalling 365 sqm (GIA);
- Comprehensive internal refurbishment and configuration to accommodate the proposed residential use;
- Thermal upgrades and introduction of renewable technology to improve the thermal performance of the building and ensure a sustainable development footprint;
- Construction work is limited to the existing envelope meaning the external footprint of the building remains unaltered;
- Limited alterations to the rear elevation are proposed included the introduction of x2 new windows and frosting of some existing windows to mitigate any potential amenity issues.

## PROPOSED RESIDENTIAL ACCOMMODATION

4.5 The Proposed Development seeks the conversion of 365 sqm (GIA) from office use (Class E) to four self-contained residential units (Class C3), whilst maintaining the existing floor space of 365 sqm (GIA). Each residential unit would accommodate 2 bedrooms (3 persons), exceed minimum space standards and be dual aspect.

4.6 Unit 1 and Unit 2 located at Lower Ground and Raised Ground Floor Levels would be duplex apartments. With the living and kitchen area located at the Raised Ground Floor Level and the two bedrooms at Lower Ground Floor Level. An external separation between the front bedrooms and pavement is proposed in order to create a sense of privacy and security but allow occupants to have access to fresh air.

4.7 In addition, Unit 1 is provided with access to a private terrace at the rear lower ground level.

4.8 Unit 3 and Unit 4 located at First and Second Floor Levels would be 2-bedroom lateral apartments, with open plan living, kitchen and dining areas.

Residential Unit	Unit 1	Unit 2	Unit 3	Unit 4
<b>No. of storeys</b>	Duplex (2 storey dwellings)	Duplex (2 storey dwellings)	1 storey dwelling	1 storey dwelling
<b>No. of bedrooms &amp; no. of persons</b>	2-bed 3-persons	2-bed 3-persons	2-bed 3-persons	2-bed 3-persons
<b>Minimum Space Standards (GIA)*</b>	70 sqm	70 sqm	61 sqm	61 sqm
<b>Floor area (GIA)</b>	74.45 sqm	80.97 sqm	76.29 sqm	97.90 sqm

\*based on Technical Housing Standards – Nationally Described Space Standards (March 2015 and update May 2016).

- 4.9 All of the proposed dwellings exceed the Minimum Space Standards, with three units comfortably above and also exceeding the Mayor of London's Best Practice areas.

#### **PHYSICAL ALTERATIONS**

- 4.10 As set out above, the Proposals seek a number of internal and external alterations to the Site.
- 4.11 The principal work includes the removal of inappropriate and intrusive office use features throughout the Site. This largely comprises the loss of modern and non-original fabric. The link between the Site and no. 9 John Street is proposed to be blocked to remove the existing connection.
- 4.12 External alterations include the erection of x2 new windows at the rear of the Site to ensure that the residential units are dual aspect and provide a higher standard of living accommodation. Some of the existing windows at the rear are proposed to be frosted to prevent overlooking and maintain privacy.

#### **PARKING AND ACCESS**

- 4.13 The Proposed Development is 'car free' and would not provide any on-site car parking.
- 4.14 Cycle parking is not currently provided in the existing building but will be provided as part of this Application, with stores in the rear courtyard. Each residential unit is afforded two cycle parking spaces with two additional stacked bi-fold cycle lockers. Further space for folding bikes is provided within Unit 1 and 2.
- 4.15 The main access to the Site is via the front door on Northington Street to the residential dwelling.

# 5.0 PLANNING POLICY FRAMEWORK

5.1 This section of the Statement outlines the relevant national, regional and local planning policy and guidance documents against which the Proposed Development should be assessed against.

## THE STATUTORY DEVELOPMENT PLAN

5.2 Section 38 (6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the Statutory Development Plan, unless material considerations indicate otherwise.

5.3 The adopted Statutory Development Plan for the Site comprises:

- The London Plan (March 2021); and
- Camden Local Plan (July 2017).

### National Planning Guidance

5.4 The National Planning Policy Framework (“NPPF”) was originally published in 2012, and revised in 2018, 2019 2021, with the latest revision published December 2023. The NPPF sets out the Government’s economic, environment and social planning policies for England and supersedes the vast majority of previous Planning Policy Guidance Notes and Planning Policy Statements.

5.5 At the heart of the NPPF is a presumption in favour of sustainable development (**Paragraph 11**). This means approving development proposals that accord with an up-to-date development plan without delay.

5.6 The NPPF is a material consideration in the determination of planning applications.

5.7 In addition to the NPPF, the Planning Practice Guidance (“PPG”) was first published by the Government in March 2014 as a web-based resource which provides up-to-date and accessible national planning guidance. The PPG outlines how government planning practice should be followed and interpreted in accordance with the principles of the NPPF. Regarding decision making, the guidelines set out in the PPG are a material consideration and accordingly should carry weight in the determining of planning applications.

### Regional Planning Guidance

5.8 The London Plan (March 2021), prepared by the Greater London Authority (“GLA”), is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor’s vision for Good Growth. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the Statutory Development Plan.

5.9 The objectives of the London Plan seek to ensure that London can meet the challenges of economic and population growth, be internationally competitive and successful, deliver diverse, strong, secure and accessible neighbourhoods; be world-leading in improving the environment; and be easy, safe and convenient for everyone to access, jobs, opportunities and facilities.

5.10 The GLA have published London Plan Guidance (“LPG”) and Supplementary Planning Guidance (“SPG”) which provide further information about how the London Plan should be implemented.

### Local Planning Guidance

5.11 The Camden Local Plan was adopted by Camden in July 2017. It replaced the Core Strategy and Camden Development Policies (previously adopted in 2010) as the basis for planning decisions and future development in Camden. The Local Plan ensures that Camden have planning policies that respond to the borough’s unique characteristics and contribute to delivering local priorities. The Local Plan covers the period from 2016-2031.

5.12 The Camden have also published numerous Camden Planning Guidance (“CPG”) which provide advice and information on how policies are to be interpreted and applied. The adopted CPG documents are material considerations in planning decisions. However, they have less weight than the Local Plan or other Development Plan documents. In respect of this Application, the relevant documents include:

- Access for All CPG (March 2019);
- Air Quality CPG (January 2021);
- Amenity CPG (January 2021);
- Basements CPG (January 2021);
- Biodiversity CPG (March 2018);
- Design CPG (January 2021);
- Developer Contribution CPG (March 2019);
- Employment Sites and Business Premises CPG (January 2021);
- Energy Efficiency and Adaptation CPG (January 2021);
- Housing CPG (January 2021); and
- Transport CPG (January 2021).

5.13 In addition to the above, the Camden adopted the Bloomsbury Conservation Area Appraisal and Management Strategy in April 2011 which defines the special interest of the Conservation Area in order that its key attributes are understood and can be protected, and that measures are put in place to ensure appropriate enhancement. It replaces the Conservation Area Statement adopted in 1998.

#### Emerging Planning Policy

5.14 Camden has started preparing a new Local Plan for Camden, which will include site allocations. The new Local Plan would set out the vision for future development in Camden for the next 15 years, covering the period from 2026 - 2041. The new Local Plan would replace the adopted Camden Local Plan (2017) and Site Allocations Plan (2013).

5.15 Camden published the Local Development Scheme (December 2023) setting out the anticipated timetable for the production of the new Local Plan, which reads as follows:

- Initial consultation on Local Plan issues and further call for sites – Winter 2022 / 2023
- Preparation of draft Local Plan and updated Site Allocations – Autumn – Winter 2023
- Consultation on draft Local Plan and updated Site Allocations – Winter 2023 / Spring 2024
- Preparation of Submission Drafts Spring 2024 – Winter 2024
- Consultation on Pre Submission Drafts – Winter 2024 / 2025
- Submission to the Secretary of State – Spring 2025
- Independent examination hearing sessions Autumn – Winter 2025
- Inspector’s report – Spring 2026
- Adoption – Summer 2026

5.16 Camden is currently consulting on the draft new Local Plan (Regulations 18) between Wednesday 17 January to Wednesday 13 March 2024.

5.17 Considering this and in accordance with **Paragraph 48** of the NPPF, the draft new Local Plan can only be afforded very limited weight given that it has not reached an advanced stage of preparation.

#### Site Specific Designations

5.18 The Site is the subject of the following designations under the Camden’s Interactive Policies Map:

- Central London Area (i.e. Central Activities Zone);
- Blackheath Point to St. Paul’s Cathedral LVMF Protected Viewing Corridor (6A.1); and

- Bloomsbury Conservation Area.

5.19 As noted previously, the Site is curtilage listed due to the rear internal link with no. 9 John Street (Grade II listed).

# 6.0 PLANNING POLICY ASSESSMENT

6.1 This section of the Statement assesses the component parts of the Proposed Development against the Statutory Development Plan and other material considerations as outlined in **Section 5.0**.

6.2 The relevant planning considerations that are assessed within the section include the following:

- Loss of Office Floorspace
- Principle of Residential Development
- Affordable Housing
- Housing Mix
- Design Principles
- Heritage and Townscape
- Residential Amenity
- Transport
- Sustainability and Energy
- Waste and Recycling

## LOSS OF OFFICE FLOORSPACE

6.3 The lawful use of the Site is office use which falls under Class E of the Use Class Order Amendment 2020. The Proposals which seek to convert the Site from office to residential use, has had regard to the relevant policies within the Camden Local Plan and the Employment Sites and Business Premises CPG (January 2021) and full consideration is set out within the supporting Loss of Employment Report.

6.4 **Camden Local Plan Policy E2 (Employment Premises and Sites)** states that the Council will protect sites that are suitable for continued business use, in particular premises for small businesses, businesses and services and those that support the functioning of the CAZ and local economy.

6.5 **Policy E2** notes that Camden will resist development of business premises for non-business use unless it is demonstrated that the building is no longer suitable for its existing business use and the possibility of retaining, reusing or redevelopment the site for similar or alternative business has been fully explored over an appropriate period of time.

6.6 The 'Employment sites and business premises' CPG provides further guidance on assessing proposals that involve a loss of a business use and the factors it will take into account.

6.7 The Site was a former printing works built in the 1880s. In the 1950s and 1970s works were undertaken to create a functional link between 9 Northington Street and 9 John Street for the use as office accommodation.

6.8 Until May 2020, the premises was occupied by a consultancy company, until it vacated, and the property was subsequently marketed. Refurbishment works were undertaken in December 2020 and an architect practice occupied a single floor for a period of time, but otherwise marketing was unsuccessful and that firm left on 1 April 2023.

6.9 The departure of the previous tenants reflects the lack of suitability of the current commercial floorspace for any potential occupier. The building is unable to fully meet the criteria set out within the policy as although the building is vacant it is not capable of being modernised to meet current standards, whilst respecting the heritage characteristics of both properties.

6.10 The proposed change of use would not result in the displacement of an existing business. Therefore, an opportunity has arisen to convert this building into residential accommodation.

### The Office Market

6.11 The Camden Employment Land Study (2014) sets out that there are a number of different markets that operate within the borough, the Central London, Camden Town and outer Camden office markets and each have distinctive sub-markets which attract different types of operators. The markets have developed due to differing occupier requirements for premises

which shape the areas they choose to operate. The existing building does not meet the requirements of these three office markets.

- 6.12 The building is located in the Bloomsbury sub-market. The sub-market continues to struggle to adapt to the wider impact of COVID and the economic environment is generally challenging. Office vacancy rates continue to rise and take-up falls, as working patterns change and density decreases.
- 6.13 The Building suffers a poor office layout and lacks an open floorplan which is sought after by start-up and micro businesses. It is more likely that SMEs would find more suitable spaces in Camden Town or Kentish Town where there is a growing hub of business space.
- 6.14 Gale Priggen & Co were instructed to undertake a review of office space on the market within the London Borough of Camden. Their report is enclosed within the Loss of Employment Statement, as part of this Application.

#### Alternative Use as Residential

- 6.15 **NPPF Paragraph 127** sets out that local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular:

*“They should support proposals to use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres and would be compatible with other policies in this Framework.”*

- 6.16 The principle of residential development in this location is set out in further detail below. Over the last 20 years, planning permission has been granted for the conversion of a large number of properties along Great Kings Street, Bedford Row and the wider Bloomsbury area, as these feature many properties which are no longer suitable for modern office use. As tenants have the opportunity to review or end their leases, they are generally taking the opportunity, especially after the COVID pandemic to seek out accommodation that is better suited to their working practices and the modern working environment.
- 6.17 The majority of the property has been vacant for over four years, and fully vacant for the past 11 months. Despite a refurbishment in December 2020, interest has been limited during a marketing exercise which has been ongoing for over three years. The prospect of continued employment use is therefore limited and the opportunity exists to find a viable use for this curtilage listed property.

#### **PRINCIPLE OF RESIDENTIAL DEVELOPMENT**

- 6.18 The Proposed Development accords with the current thrust of planning policy at national, regional and local level, which places an emphasis on achieving sustainable development. In particular, adopted plan policy is extremely clear that housing is a priority land use in Camden.
- 6.19 Housing delivery is a key objective of the NPPF and it advocates for sufficient amount and variety of land to come forward to significantly boost the supply of housing (**NPPF Paragraph 60**).
- 6.20 **NPPF Paragraph 69** also requires local planning authorities to ensure planning policies identify a sufficient supply and mix of sites taking into account their availability, suitability and likely economic viability. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements, and developable sites or broad locations for growth for 6-15 years. An appropriate buffer should be included to ensure choice and competition in the market (**NPPF Paragraph 74**).
- 6.21 **NPPF Paragraph 70** states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 6.22 **London Plan Policy H1 (Increasing Housing Supply)** states that the Mayor carried out a London-wide Strategic Housing Market Assessment (SHMA) which identified a need for 66,000 additional homes per year in London. London Plan (Table

4.1) identifies the housing target over a 10 year period from the date of publish for Camden to be 10,380 new homes, which equates to 1,038 new homes per annum.

6.23 **London Plan Policy H2 (Small Sites)** states that small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites through planning decisions. This will:

- 1) significantly increase the contribution of small sites to meeting London's housing needs;
- 2) diversify the sources, locations, type and mix of housing supply;
- 3) support small and medium-sized housebuilders;
- 4) support those wishing to bring forward custom, self-build and community led housing; and
- 5) achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.

6.24 Table 4.2 of the London Plan sets out a 10-year target of 3,280 for Camden, equating to 328 new homes within Camden on small sites per annum.

6.25 **Policy H1** states that self-contained housing is the priority land use of the Local Plan. The policy also states that Camden will resist alternative development of sites already identified through a current planning permission, unless it is shown that it is no longer developable for housing.

6.26 The principle of prioritising the delivery of housing over other uses and maximising that delivery has long been established as acceptable in Camden.

6.27 The Proposed Development would result in the creation of a four additional residential dwelling on a 'small site'. The provision of residential accommodation on this Site fully accords with the aims of the development plan and would contribute to Camden meeting its targets for housing delivery. The siting of residential development in this location, close to other residential uses should be supported.

## **AFFORDABLE HOUSING**

6.28 **NPPF Paragraph 64** requires planning policies to specify the type of affordable housing required and set policies for meeting this need on site, unless off-site provision or an appropriate financial contribution in lieu can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities.

6.29 The provision of affordable housing should not be sought for residential developments that are not major developments, other than in rural areas, as required by **NPPF Paragraph 65**.

6.30 **London Plan Policy H4** emphasises that the strategic target for affordable homes is 50% within London with specific measures to achieve this aim outlined below:

- a. *"Requiring major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach;*
- b. *Using grant to increase affordable housing delivery beyond the level that would otherwise be provided;*
- c. *All affordable housing providers deliver at least 50% affordable housing or 60% for strategic partners;*
- d. *Public sector land delivering at least 50% affordable homes; and*
- e. *Industrial land appropriate for residential use delivering at least 50% affordable housing if resulting in net loss of industrial capacity."*

6.31 **Policy H4** expresses the need for affordable housing to be provided on site with affordable housing only provided off-site or as a cash in lieu contribution in exceptional circumstance.

6.32 **Camden Local Plan Policy H4 (Maximising the supply of affordable housing)** seeks to provide 5,300 additional affordable homes from 2016 to 2031 and aims for an appropriate mix of affordable housing types. Camden expects a contribution to affordable housing from all developments that include housing and provide one or more additional homes.



6.33 The guideline mix, as set out in **Policy H4** is 60% social-affordable rented housing and 40% intermediate housing and targets are based on an assessment of development capacity whereby 100 sqm (GIA) of housing is generally considered to create capacity for one home. The Policy identifies:

- *“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% of for each home added to capacity;*
- *an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings; and*
- *where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;”*

6.34 The Proposed Development has the capacity to provide four self-contained residential units within the Building of 365 sqm (GIA). A payment-in-lieu of affordable housing is therefore acceptable on this Site, which amounts to approximately £146,000.

### **HOUSING MIX**

6.35 National planning policy contained within the NPPF requires a range of size, type and tenure of housing to address the need of different groups in the community, including affordable housing, families with children, older people and students.

6.36 **London Plan Policy H10 (Housing size mix)** states that schemes should generally consist of a range of units and requires a consideration of the appropriate mix based on a number of qualitative criteria. This includes the need to deliver a range of affordable homes, the nature and location of the site, the aim to optimise housing potential and the role of one- and two-bedroom units in freeing up family housing.

6.37 **Camden Local Plan Policy H7 (Large and small homes)** aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.

6.38 All housing development should contribute to meeting the priorities set out in the Dwelling Size Priorities Table, which identifies a high priority for two and three bed market units. However, **Policy H7** also states that Camden will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, having regard to a number of considerations.

6.39 The Proposed Development would provide four self-contained residential units that exceed the minimum space standards. All four of the properties would be two bedroom units, although a variety of size and a mix of lateral and duplex units provides some mix. The Site is constrained by re-using the existing building and its floorplates, with the proposed design considered to optimise development.

6.40 Whilst the Site cannot provide a mix of units, it does meet the aims of **Policy H7** with regard to providing high priority housing units. The property is therefore appropriate, given the building's current form and layout.

### **DESIGN PRINCIPLES**

6.41 High quality and inclusive design are encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development, and should contribute positively to making places better for people. Part 12 of the NPPF outlines the requirement for good design and sets out, at **NPPF Paragraph 135**, that development:

- (a) “will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- (d) 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;*

- (e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- (f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

6.42 **London Plan Policy D4 (Delivering Good Design)** states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. Likewise, **London Plan Policy D5 (Inclusive Design)** recognises the importance of developments achieving high standards of accessibility and inclusivity through design.

6.43 **Camden’s Local Plan Policy D1 (Design)** seeks to secure high quality design in development and requires development to:

- a) *“respects local context and character;*
- b) *preserves or enhances the historic environment and heritage assets...;*
- 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;*<sup>20</sup>
- 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 significant and protected views;*
- n) *for housing, provides a high standard of accommodation; and*
- o) *carefully integrates building services equipment.”*

6.44 **Camden Local Plan Policy C6 (Access for All)** seeks to promote fair access and remove barriers that prevent everyone from accessing facilities and opportunities. The policy expects buildings and places to meet the highest practicable standards of accessible and inclusive design with fully accessible routes through buildings and facilities in the most accessible parts of buildings.

6.45 Due to the historic nature of the property, it is not possible to adhere to Building Regulations with regard to access as step free access cannot be provided throughout the building – noting a stepped access from street level.

6.46 A Design and Access Statement prepared by Studio 3 Architects, is submitted as part of the Application. This document sets out in detail an evaluation of the scheme’s design and how it responds to the context of the existing building and surrounding area.

6.47 A Structural Statement has also been prepared by Quantum Engineer, the Statement concludes that the proposed alterations are relatively minor and restricted to providing new openings, alterations to existing openings and allowing for the distribution of services up through the building. The Proposals can be carried out without impacting the structural stability or integrity of the existing building and the original boundary walls.

6.48 In accordance with policy requirements the Proposals provide a sensitive design with alterations to the Building that are appropriate in the context of its historic character and interest.

## HERITAGE AND TOWNSCAPE

6.49 The existing Building is curtilage listed due to its internal rear link and functional association to no. 9 John Street which is Grade II, and forms part of a group listing comprising the Georgian terraces at nos. 2-9 John Street (8 terraced houses). The Site is also located within the Bloomsbury Conservation Area and owing to its central London location, the Site is within the proximity of a number of other listed buildings.

6.50 **Paragraph 200** of the NPPF states that:

*“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”*

6.51 **NPPF Paragraph 205** notes that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be.

6.52 Any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting should require, clear and convincing justification (**NPPF Paragraph 206**).

6.53 **London Plan Policy HC1 (Heritage Conservation and Growth)** states that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

6.54 **Camden Local Plan Policy D2 (Heritage)** outlines that the Council will preserve and, where appropriate, enhance the rich and diverse heritage assets and their settings, including conservation areas, listed building, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

6.55 In relation to designated heritage assets, **Policy D2** states:

*“The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- (a) the nature of the heritage asset prevents all reasonable uses of the site;*
- (b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- (c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- (d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

*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.”*

6.56 In relation to conservation areas, **Policy D2** sets out that Camden will:

- (e) “require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- (f) resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- (g) resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- (h) preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.”*

6.57 In relation to listed buildings, **Policy D2** sets out that Camden will preserve and enhance these through:

- (i) “resist the total or substantial demolition of a listed building;*

- (j) *resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*
- (k) *resist development that would cause harm to significance of a listed building through an effect on its setting.”*

- 6.58 A Heritage Appraisal, prepared by The Heritage Practice, accompanies this Application. The Appraisal concludes that the proposed residential use is deemed logical and sympathetic, with retention of the main staircase proposed and internal spaces well suited to conversion.
- 6.59 The interior of the Site lacks intrinsic interest and value and makes little contribution to the overall significance of the Site of the listed building (no. 9 John Street). The blocking of the link between the two properties would not have an impact on the special interest of the listed building.
- 6.60 Externally, the changes are limited and would not change the appearance of the Building other than at the rear lower ground level. Therefore, the proposals would not cause harm to the character or appearance of the Bloomsbury Conservation Area.
- 6.61 Overall, the Heritage Appraisal demonstrates that the Proposed Development would be acceptable in terms of according with the relevant policies on design and heritage, avoiding harm to no. 9 John Street (Grade II listed), the Bloomsbury Conservation Area and nearby listed buildings, and therefore the decision taker is able to discharge the statutory duties of the Planning (Listed Buildings and Conservation Area) Act 1990 and national, regional and local planning policy.

**RESIDENTIAL AMENITY**

- 6.62 **Camden Local Plan Policy A1 (Managing the Impact of Development)** seeks to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity.
- 6.63 **Policy A1** continues to state that Camden will:
- (e) *“seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
  - (f) *seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*
  - (g) *resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*
  - (h) *require mitigation measures where necessary.”*
- 6.64 The factors we will consider include:
- (e) *“visual privacy, outlook;*
  - (f) *sunlight, daylight and overshadowing;*
  - (g) *artificial lighting levels;*
  - (h) *transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;*
  - (i) *impacts of the construction phase, including the use of Construction Management Plans;*
  - (j) *noise and vibration levels;*
  - (k) *odour, fumes and dust;*
  - (l) *microclimate;*
  - (m) *contaminated land; and*
  - (n) *impact upon water and wastewater infrastructure.”*

Impact on Amenity

- 6.65 Local Plan **Policy A1** is supported by the Camden CPG on Amenity which provides further guidance on the expectations that Camden has when considering the impact of schemes on daylight and sunlight levels. It notes that levels of reported daylight and sunlight will be considered flexibly taking into account site-specific circumstances and context.

6.66 The Proposed Development has been designed to limit the impact on neighbouring residential (and other uses) amenity and ensure that future residents are afforded appropriate levels of amenity. The proposed alterations to the Building are minor and would at least preserve the amenity currently enjoyed by nearby residents and occupiers.

6.67 Window to window separation distances are sufficient between 9 Northington Street and the rear of the other properties on 9 John Street, so this is unlikely to lead to any privacy or overlooking issues. The windows of Unit 2, which face into the rear courtyard can be applied with obscured glazing or film to limit any glimpsed views into these bedrooms and dining areas.

#### Daylight and Sunlight

6.68 **London Plan Policy D6 (Housing Quality and Standards)** states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside space.

6.69 The Proposals do not involve any new build elements and therefore would not affect the daylight or sunlight of any neighbouring properties.

6.70 An Internal Daylight Assessment has been prepared by T16 Design to assess the proposals in respect of daylight matters within the habitable rooms of each of the four proposed units.

6.71 The assessment has used the Target Daylight Factor (DFT) test as prescribed by the BRE guidance and BS EN 17037:2018 and the results show that the habitable rooms would have levels of natural light in excess of the minimum standards. Therefore, future occupiers would have access to well-lit rooms and won't need to rely on artificial lighting.

#### Noise

6.72 **London Plan Policy D14 (Noise)** states that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by avoiding significance adverse noise impacts on health and quality of life, reflect the Agent of Change principles, mitigate and minimising the existing and potential adverse impacts of noise as a result of new development and improving and enhancing the acoustic environment and promoting appropriate soundscapes.

6.73 A Noise Impact Assessment has been prepared by KP Acoustics to assess the daytime and nighttime noise levels experienced by the Proposed Development. Internal and external noise surveys were undertaken continuously between 19 January 2024 23 January 2024.

6.74 The assessment concludes that noise levels measured internally demonstrate that the existing external building fabric would be sufficient in providing a suitable residential environment, and existing noise levels meet the design criteria of British Standards BS8233:2014. Therefore, no mitigation measures are required.

6.75 The assessment also reviewed the impact of the proposed plant units (ASHPs) located at roof level to the nearest sensitive noise receptor (no.7 Northington Street) , in accordance British Standard BS4142:2014. The results shows that the noise emissions generated from the plant units would not have an adverse impact on the nearest residents.

#### Construction Management Plan

6.76 The supporting text to **Camden Local Plan Policy A1** (Paragraph 6.12) outlines that measures required to reduce the impact of demolition, excavation and construction works must be outlined within a Construction Management Plan (CMP).

6.77 In accordance with adopted plan policy and Camden Planning Guidance, the Construction Management Plan (CMP) Pro Forma has been drafted and submitted with this application by Motion.

6.78 This demonstrates how construction impacts will be minimised, in relation to site activity during works and the transport arrangements for vehicles servicing the Site.

6.79 We note that this draft Pro Forma would be progressed to a final version should the Planning Application be permitted. As is usual in Camden, this is likely to be the requirement of clause in the Section 106 legal agreement, if required for this size of development.

#### Private Amenity

6.80 Local Plan Policy A2 (Open Space) requires developments to seek opportunities for providing private amenity space

6.81 Due to the nature of the existing building and its curtilage listed status, it is no possible to provide all proposed units with private amenity space. Unit 1 is provided with access to the rear courtyard at lower ground floor, which would be for private use for this unit.

6.82 All units can access the other part of the rear courtyard, although the principle use of this space is to provide storage for cycles. Units 1 and 2 are also provided with a covered external area in the bedrooms at lower ground floor, which provide further access to fresh air.

6.83 Otherwise, all of the proposed units exceed the minimum space standards by 4.5 sqm (Unit 1), 11 sqm (Unit 2), 15 sqm (Unit 3) and 18 sqm (Unit 4), respectively. The proposed dwellings would therefore be a comfortable size and would also exceed the Best practice standards set out within the Mayor's Housing Design Standards (July 2023).

6.84 The Site is also located only 130m from Gray's Inn Gardens which provides some public open space and is also less than 500m to Coram's Fields and 850m to Russell Square, providing additional opportunities for recreation.

6.85 Overall, we consider the proposed dwellings would be of high quality and offer comfortable spaces for modern living.

#### **TRANSPORT**

6.86 Section 9 of the NPPF sets out the Government's policies with regard to transport. **NPPF Paragraph 114** sets out that development should ensure that:

- (a) *"appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- (b) *safe and suitable access to the site can be achieved for all users; and*
- (c) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*

6.87 The chapter concludes at **Paragraph 117** that:

*"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed."*

6.88 Chapter 10 of the London Plan provides the regional guidance for transport.

6.89 **London Policy T1 (Strategic Approach to Transport)** outlines how development proposals should facilitate "the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041". Additionally, all development should make the most effective use of land, reflecting it's connectivity and accessibility by existing and future public transport, walking and cycling routes and ensure any impact is mitigated.

6.90 **London Policy T2 (Healthy Streets)** aims to improve London's health through delivering patterns of land use that facilitate residents making shorter and more regular trips by walking and cycling.

6.91 At the local level, **Local Plan Policy T1 (Prioritising Walking, Cycling and Public Transport)** is the primary transport policy which promotes sustainable transport in the borough. The policy seeks to ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links.

6.92 The Site is located on the southern side of Northington Street which connects to Gray's Inn Road (A5200) to the east. The site benefits from close proximity to the A501 and the A40, as well as a number of bus stops and Holborn Railway Station.

- 6.93 The Transport for London's Public Transport Accessibility Levels ("PTAL") calculator indicates that the site achieves a PTAL level of 6b, which indicates that the site has the highest possible level of accessibility to public transport.
- 6.94 A Transport Statement has been prepared by Motion to accompany this Planning Application. The Statement has been prepared to address the transport implications of the proposed development, namely the proximity of the site to sustainable modes of travel as well as the impact of the proposals in traffic, parking and servicing terms.
- 6.95 Servicing and refuse collection would continue to be undertaken as per the existing arrangements of the Site. Servicing and delivery vehicles will stop on street on Northington Street.
- 6.96 The development for residential accommodation would result in a negligible number of deliveries, which would be mainly contained to weekly food deliveries or parcels to the Site. This is not likely to result in a materially detrimental impact on the operation of the local highway network.
- 6.97 The Transport Statement concludes that the development is expected to result in a reduction in two-way person trips during each of the morning and evening peak periods, when compared to the existing use.
- 6.98 Overall, the Proposed Development is unlikely to result in a material effect on the highway network local to the Site and there are no highway or transport reasons why the development proposals should be resisted. Specific matters are addressed in further detail below.

#### Car Parking

- 6.99 The NPPF requires local authorities to consider parking provision within new developments based upon the accessibility of the development and the opportunities for public transport and facilitate the provision of ultra-low emission vehicles.
- 6.100 **London Plan Policy T6 (Parking)** outlines that the Mayor wishes to see car parking restricted in line with the levels of public transport accessibility and connectivity with a greater emphasis on car-free development. Whilst car-free development has no general parking, disabled persons parking should still be provided.
- 6.101 **Camden Local Plan Policy T2 (Parking and Car-free Development)** limits the availability of parking and requires all new development in the borough to be car-free. It is noted that the policy also supports the redevelopment of existing car parks for alternative uses. Car parking will be limited to spaces designated for disabled people where necessary and essential operating or servicing needs.
- 6.102 The local area has minimal reliance on the private car ownership.
- 6.103 The Proposed Development does not provide any car parking spaces. As a result of its sustainable location and excellent accessibility to public transport and active travel modes, no additional car parking would be required. The development is therefore 'car free', with future residents not eligible to apply for parking permits within the local controlled parking zone (to be secured via a S106 Agreement). It is also appropriate in the context of its location, which is highly accessible and promotes the use of public transport, cycling and walking.

#### Cycle Parking

- 6.104 Both the NPPF and the London Plan promote cycling in locations which can be made sustainable.
- 6.105 **London Plan Policy T5 (Cycling)** outlines the Mayor's strategy to increase cycling within the capital. The policy outlines that development should contribute to the increase of cycling through the provision of cycle parking facilities and on site changing facilities. Furthermore, developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards.
- 6.106 **Policy T5** outlines that for C3-C4 use class (all dwellings), long-stay cycle parking facilities would need to be provided within the development.
- 6.107 To promote cycling in the borough and ensure a safe and accessible environment for cyclists, Camden will seek to ensure that development:

- *provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within CPG7: Transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development; and*
- *makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.*

6.108 The Proposed Development provides space for 8 standard cycle parking spaces, equivalent to 2 spaces per unit. This comprises a cycle storage cupboard located externally at the rear courtyard and accessed at ground floor level.

6.109 The Proposal also includes 2 stacked bi-fold cycle lockers for unit 3 and unit 4 located externally at the rear courtyard. Unit 1 and unit 2 have a single bi-folded locker located internally within the unit. Therefore, the Site has capacity to accommodate a total of 12 cycle spaces.

6.110 The existing building does not currently provide any dedicated cycle storage, so this represents an improvement to cycle parking.

## **SUSTAINABILITY AND ENERGY**

6.111 The NPPF supports the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourages the reuse of existing resources, including conversion of existing buildings, and encourages the use of renewable resources.

6.112 The London Plan sets out a number of core policies for major developments with regard to reducing carbon dioxide emissions and providing energy in a sustainable manner. The Proposed Development is a 'minor' scheme involving the conversion and refurbishment of an office building to form four residential units.

6.113 **London Plan Policy SI 2 (Minimising Greenhouse Gas Emissions)** states that development proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the 'be lean, be clean, be green and be seen' energy hierarchy. It seeks a 35% improvement in carbon reductions over 2013 Building Regulations for major developments with residential development advised to achieve 10%.

6.114 The London Plan contains a number of other adopted policies which are relevant to the sustainability of the development, including **SI 4 (Managing Heat Risk)** and **SI 7 (Reducing Waste and Supporting the Circular Economy)**. Many of the GLA's policies are not suitable to be applied to minor developments.

6.115 At the local level, **Camden Local Plan Policy CC1 (Climate Change Mitigation)** requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and operation.

6.116 Camden promotes zero carbon development in accordance with the London Plan, requiring all development to reduce carbon dioxide emissions through following the steps of the energy hierarchy.

6.117 **Camden Local Plan Policy CC2 (Adapting to Climate Change)** requires development to be resilient to climate change and adopt appropriate adaptation measure, although many of those outlined within the policy are not applicable to a scheme of this size.

6.118 **Policy CC2** also seeks to ensure that development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation. The policy expects domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM domestic refurbishment.

6.119 This Planning Application includes a Sustainability Statement, prepared by Webb Yates Engineers, which sets out the energy efficiency measures to reduce the energy consumption of the Proposed Development, alongside carbon reductions through passive and active design measures.



- 6.120 In addition, the Proposed Development has been designed with the aim of reducing operational energy and associated carbon emissions, whilst the embodied carbon content of materials will be minimised as far as possible.
- 6.121 As the Site is below 500 sqm, BREEAM has not been explored.
- 6.122 The Site constraints limit the feasibility of utilising Low or Zero Carbon (LZC) technologies. The Sustainability Statement assesses the LZC technologies and deems air-source heat pumps (“ASHP”) as the most appropriate, with the proposed location externally at roof level.
- 6.123 The sustainable design of the Site follows the GLA’s energy hierarchy, through seeking ways to reduce the need for energy and using energy more efficiently. The proposed measures are as follows:
- Be Lean – A number of sustainable design and construction methods have been incorporated into the design of the building which comply with the requirement to reduce energy demand. These include:
    - High Performance Building Envelope;
    - Enhanced Air Tightness and Good Detailing;
    - Limit Overheating;
    - Daylight;
    - Ventilation;
    - Heating;
    - Efficient Systems;
    - Minimising Water Usage;
    - Energy Efficient Lighting and Appliances;
  - Be Clean – The building is not capable of connecting to an existing low carbon heat network due to the location;
  - Be Green – ASHP technology is proposed to provide heating and hot water; and
  - Be Seen – Details of the buildings systems and services would be provided to the occupiers and would allow monitoring.
- 6.124 The design has also considered the GLA’s cooling hierarchy and proposes the following measures:
- Minimising Internal Heat Gains – Inclusion of insulated pipe work, efficient light fittings, and low energy lighting;
  - Reducing Heat Entering the Building – Replacement of single-glazed windows for secondary glazing;
  - Passive Ventilation – Inclusion of openable windows;
  - Mechanical Ventilation – Mechanical extract ventilation is proposed in wet rooms; and
  - Active Cooling – Not proposed.
- 6.125 The measures set out in the cooling hierarchy mitigate the risk of overheating.
- 6.126 The existing building’s thermal fabric is being retained and upgraded to a standard in line with Part L of Building Regulations, with an overall improvement and reduction of regulated energy consumption and associated carbon emissions of 19% over Part L. The final regulated emissions for the development have been calculated to be 1.8 tonnes CO<sub>2</sub>/year, compared to a baseline of 2.3 tonnes CO<sub>2</sub>/year.
- 6.127 Overall, the sustainability strategy for this conversion stems from the use of more efficient services and maintenance such that it can be operated in an efficient way. The proposals therefore provide a highly energy efficient and sustainable building which meets the objectives of the London Plan and Camden Local Plan.
- WASTE AND RECYCLING**
- 6.128 **Camden Local Plan Policy CC5 (Waste)** seeks to make Camden a low waste borough and aims to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled / composted by 2020 and aspiring to achieve 60% by 2031. The policy also seeks to make sure that developments include facilities for the storage and collection of waste and recycling.
- 6.129 An enclosed refuse store is proposed at ground floor level in an accessible communal area. The store would hold 2 x 240L wheeled containers serving the 4 units.

6.130 Each unit (x4) would include a dedicated temporary refuse store for general waste, mixed recycling and food waste in the kitchen.

6.131 Refuse and recycling would be periodically taken out by occupants from the Building to the kerbside on the relevant collection date. This follows the existing arrangements for the Building.

**S106 DRAFT HEADS OF TERMS**

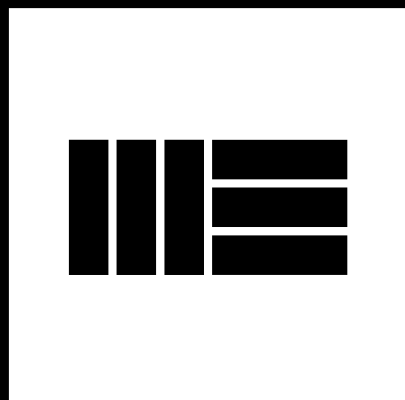
6.132 We expect the following head of terms for a S106 Agreement:

- Affordable Housing Payment in Lieu;
- Construction Management Plan; and
- Restriction on Parking Permits.

# CONCLUSION

- 7.1 The Proposed Development to which this Statement relates, seeks the conversion and refurbishment of no. 9 Northington Street as part of a change of use to residential accommodation including associated physical alterations.
- 7.2 The Planning Statement has assessed the Proposals against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act.
- 7.3 The Proposed Development has been formulated in accordance with the NPPF, the adopted London Plan and policies set out within the Camden Local Plan. It accords with the relevant policies of the adopted and emerging development plan, as well as being consistent with national planning policy.
- 7.4 Having regard to the assessment undertaken within this Statement, we consider the planning benefits arising from this scheme can be summarised as follows:
- Deliver sustainable development of a vacant, brownfield Site within Central London, in line with the overarching approach to development outlined in the NPPF;
  - Ensure that the Site is brought back into an optimum use, through the creation of a high-quality residential dwellings;
  - Deliver a design of high-quality architecture that would be congruous to the surrounding context, including preserving and enhancing the character and appearance of the conservation area and setting of listed buildings within the vicinity;
  - Result in an enhancement to the significance of the listed building (no. 9 John Street);
  - Deliver a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the Building; and
  - Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development with cycle parking provision which would promote other means of travel such as cycling and walking.
- 7.5 The proposed conversion of the building to four self-contained residential units represents a significant enhancement over and above the existing situation.
- 7.6 In light of the above, we respectfully request that Camden grants planning permission and listed building consent for the Proposed Development.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.  
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL