

3.0 PROPOSED DEVELOPMENT

3 PROPOSED DEVELOPMENT

3.1 Overview

3.1.1 Overview

As noted at the beginning of this document, this application is for a Change of Use for 33 John Street from the current Class E (commercial, business and service) to Class C3 (dwellinghouse) residential use. The development proposes conversion of the building into a single-occupancy home. This conversion will require several alterations to the Building in order to ensure its transformation back into a functional and desirable residence.

The Proposed Development is a largely internal renovation project, with some external interventions, that will respect and complement the historic features of the property; and in cases where these features have been lost, it will seek to reinstate them according to the original historic building design. Outdated, inconsiderate and insensitive office elements will be removed during the conversion. Commercial services will be replaced with domestic services.

3.1.2 Layout

The original plan of the principle stories of the Building will be retained. The proposed layouts, while at a high level reinstating the original historic residential arrangements of the floor plans as far as possible, also reflect changes in living standards over the past centuries, and are designed to afford the highest level of comfort and convenience offered by such a historic property, in doing so ensuring that its heritage is preserved and can be enjoyed by future generations.

3.1.3 Scale

The scale of the property will not be altered.

3.1.4 Appearance

There are no major proposed alterations to the elevations of the Building, in order to ensure continuity of the street scene and preserve the character of the conservation area. The rear elevation at lower ground and ground level will be altered by the removal of the modern extension, but the appearance of the recovered facades will be detailed to match the rest of the external elevation and its historic detailing, including where possible from archival information. Since these alterations are at the rear and lower levels of the property, they will not affect any street view. An additional benefit to undertaking the works would be to undertake general repairs to the facade.

3.1.5 Access

The Proposed Development aims to utilise the existing infrastructure and facilities that serve the neighbourhood. As has been established, the property is well served by transport services, and within close walking distance to local shops, restaurants, entertainment facilities and other amenities.

3.1.6 External Alterations

As noted above, the Proposed Development involves a number of external alterations, all of which are intended to restore or reinstate heretofore lost or negatively impacted aspects of the historic building design.

The most significant of these is the removal of the majority of the non-original modern rear extension at lower ground and ground floor level. The modern roof and skylights will be removed in order to reinstate the external space at the back of the property, per the original historic arrangement of the floor plan. At ground floor level, the modern rear wing will also be removed, in order to create a small external terrace overlooking and complementing the garden space at lower ground level.

3.1.7 Internal Alterations

Several internal alterations will also be required in order to successfully restore the property to its original residential use. The majority of these interventions will involve the removal or remediation of modern additions and alterations to the historic fabric of the Building.

Where further intervention is proposed, it is in line with the received understanding of the original historic arrangements of the floor plans, following detailed consultation with heritage professionals. All alterations, including and especially where they will concern the introduction of new fabric (for instance, the addition of a partition wall in order to provide a bedroom with an ensuite), will be carried out sensitively and with respect to their surroundings and elements of high heritage value.

All original decorative moulding and wall panelling will be restored. Traditional decorative mouldings will be reinstated where necessary, and will be ordered and proportionate to the Early Georgian period. In addition, the ground, first and second floors will feature exposed original floorboards.

In other areas where there is built in furniture, this furniture will not extend to ceiling level and will be built in front of existing dadoes and skirtings, to maintain and protect original detailing.

3.1.8 Room Arrangements

At the lower ground level, an open-plan kitchen and dining space run from the front to the rear of the property and open onto a small external garden space at the back. Utilities space, a pantry, a wine cellar, a staff bedroom and a small bathroom are also accommodated at this level. Bike storage, waste disposal and plant space occupy the vaults at the front of the property.

At the ground floor level, a study and living room occupy the two main rooms off of the entrance hall, while at the rear of the property a breakfast room and small bathroom connect to an external terrace overlooking the garden.

At the first floor level, a grand drawing room is located at the front of the property, to the rear of which is a TV/games room and a private office space.

The second and third floors of the property will accommodate four bedrooms, bathrooms and further living quarters. At the second floor level, the master suite connects a bedroom, bathroom and dressing room. A second bedroom with ensuite is also provided. At the third floor level, two further bedrooms are located at the front of the property, sharing a sizeable bathroom. A kitchenette and lounge/playroom are located at the rear.

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3.1.9 Lower Ground Floor

On the lower ground level, the modern extension at the rear of the building will be removed. The removal of the modern skylights and roof will reinstate the rear external space per the original historic arrangement of the floor plan.

The wall between the workshop and library will be opened up to transform these spaces into an open-plan kitchen and dining space. Following a preliminary site assessment, it is suspected that an opening may already exist behind the existing wall linings, to be confirmed following further site investigation. A substantial nub will, however, ensure the existing plan form remains legible. The kitchen is reinstated to its original historic position. This continuous space opens up onto the newly created garden at the rear.

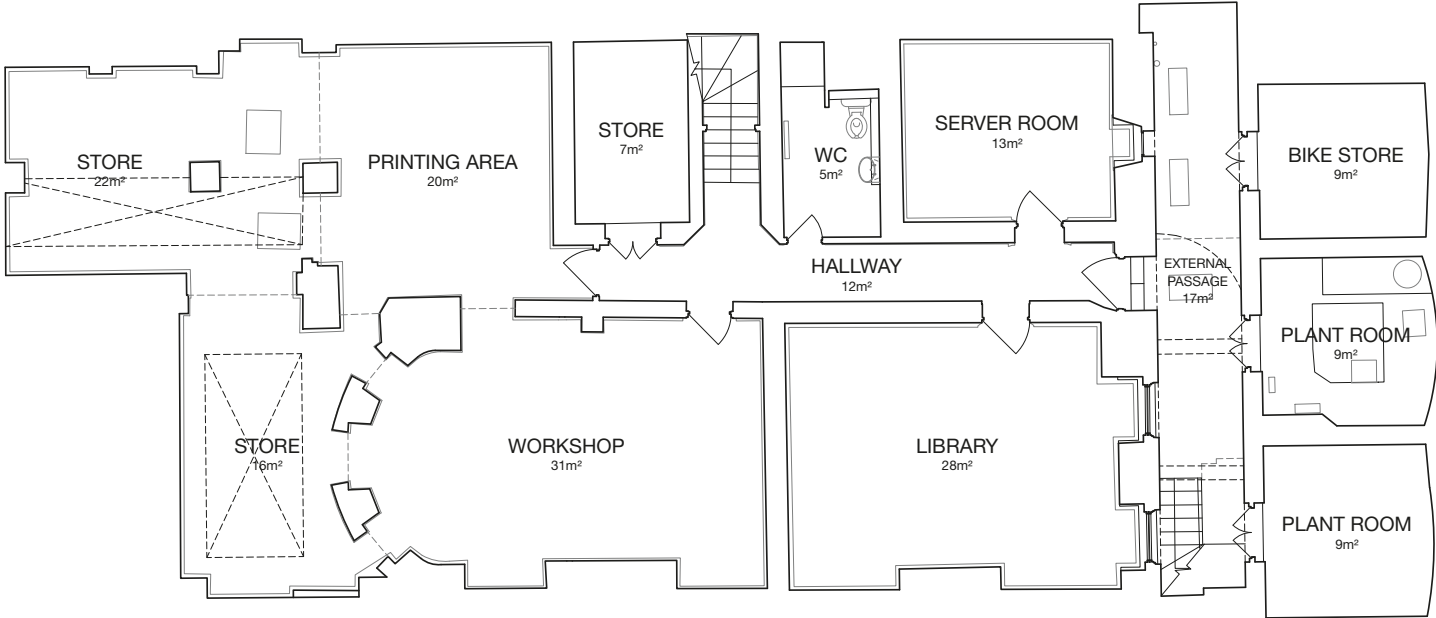
All existing utilities will be maintained. Provision for bike storage, waste disposal and plant space will be provided within the three existing vaults at the front of the property, accessible via an external lightwell passage.

The fabric of the non-historic rear wing will be maintained at this level (but removed above), providing a wine cellar connected to a small bar space.

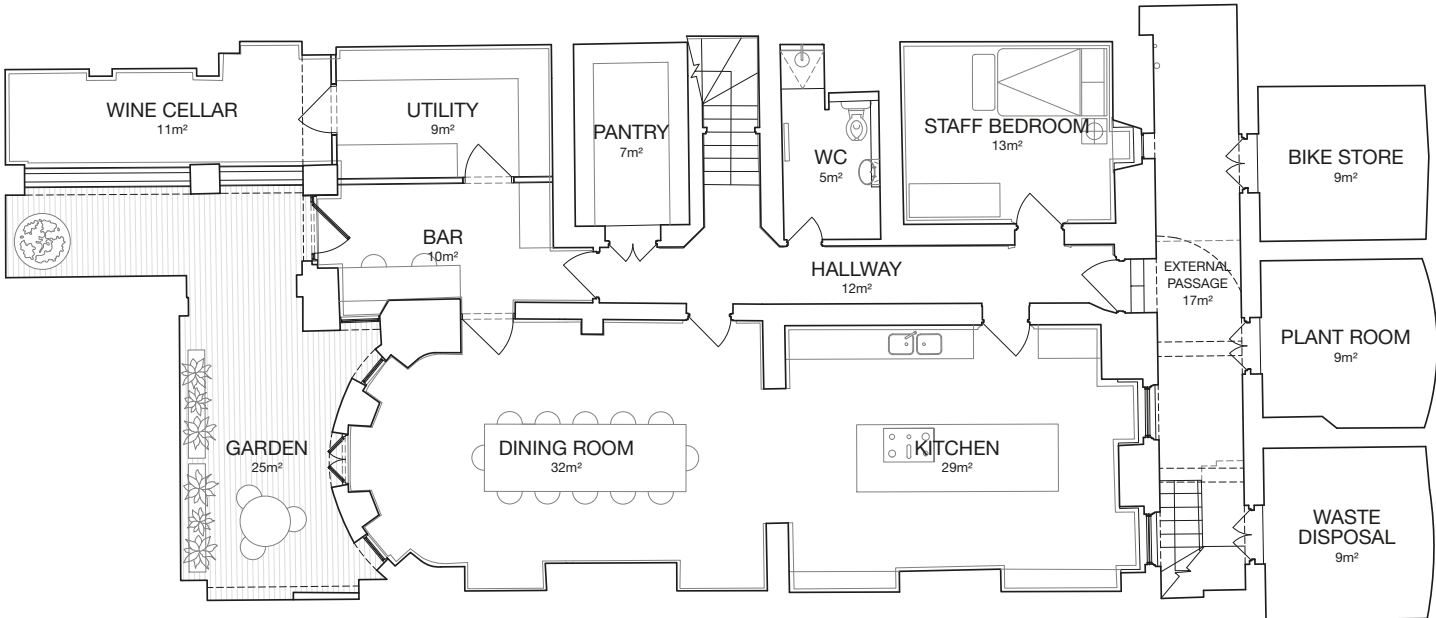
The current server room will be converted into a staff bedroom, allowing easy access to utility and food storage and preparation spaces. This bedroom is also accessible via a separate entrance at the front of the building (accessed by descending from street level into the external passage).



Key Section



Existing



Proposed

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Overview

3.1.10 Ground Floor

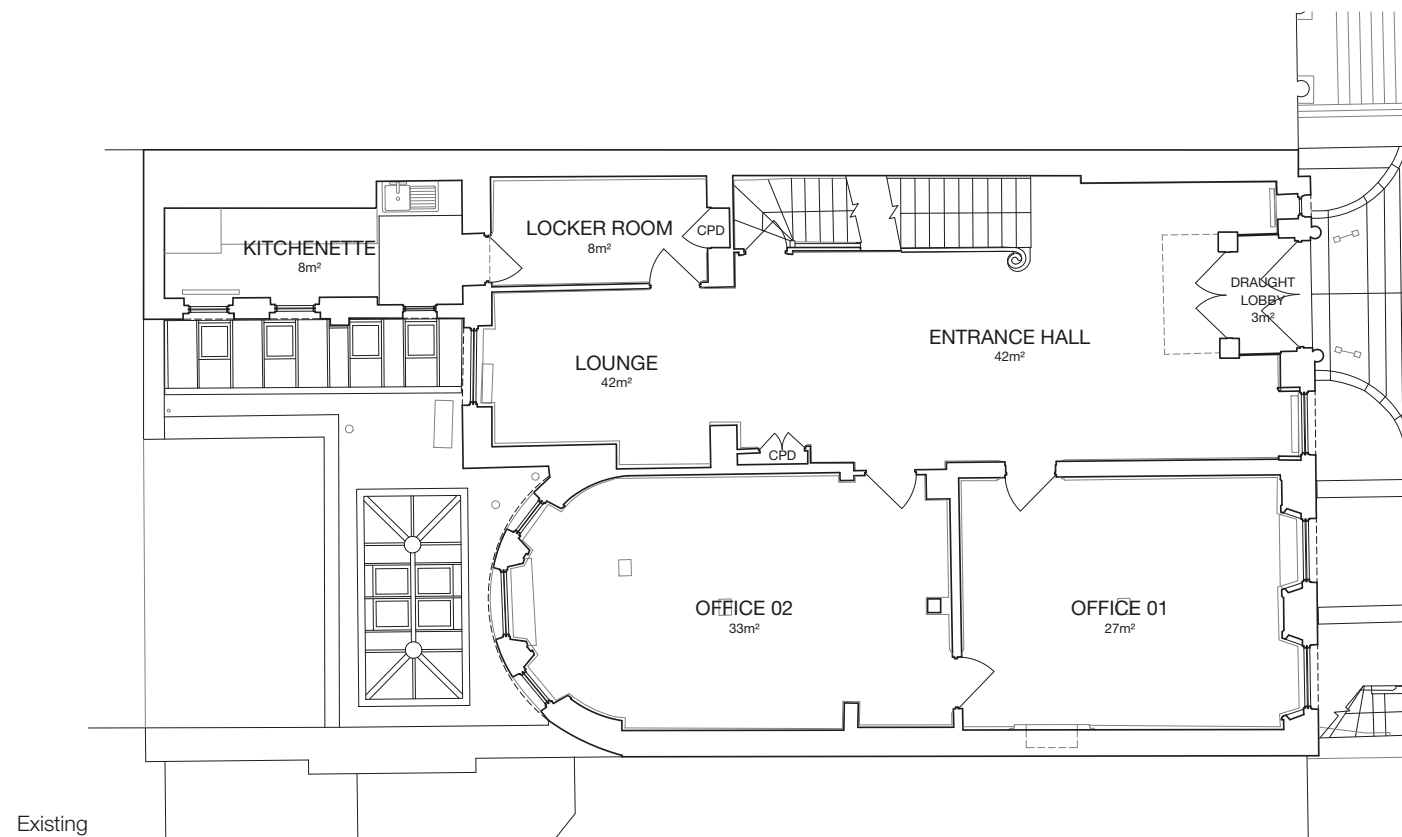
At the ground floor level, the most significant alteration is the removal of the fabric of the modern extension to the rear of the building, currently used as a kitchenette. By removing this fabric, but maintaining its volume at the level below, an area is opened up for a small external terrace accessible via the rear of the property, overlooking the garden created at lower ground level.

The arrangement of the entrance sequence is unaltered, with the draught lobby and large entrance hall looking onto the grand stair maintained. The current lounge space at the rear of the entrance hall will be enclosed, as per the historic building arrangement, and the modern partition wall separating it from the current locker room and kitchenette will be removed, reinstating the space as one large room (a breakfast room) as per the historic floor arrangement. A small bathroom will be introduced in a sensitive manner. From the breakfast room, the newly created external terrace at the rear of the property can be accessed.

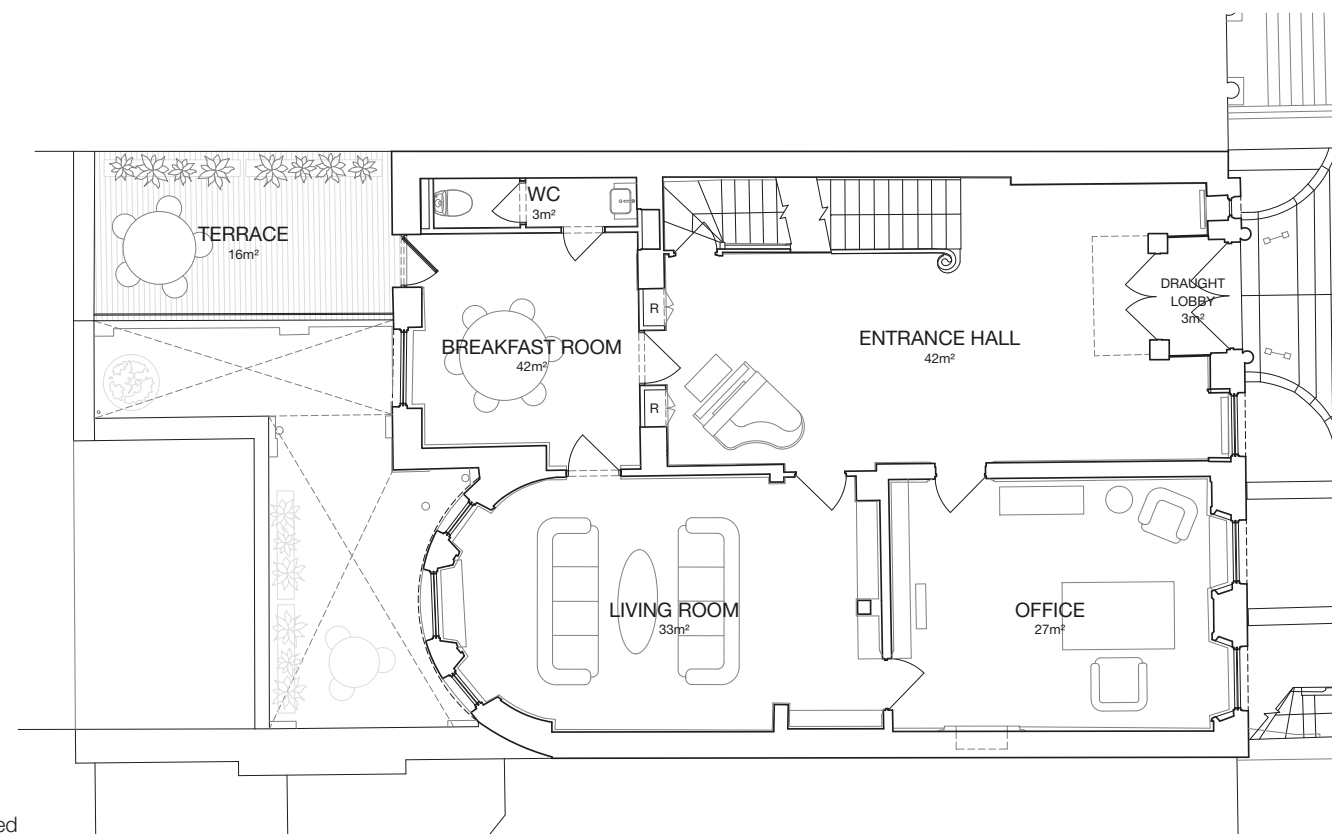
The two other rooms at ground floor level will be converted into an office or study room at the front of the building, and a spacious and light living room at the rear, which will overlook the garden at lower ground level.



Key Section



Proposed



PROPOSED DEVELOPMENT

Overview

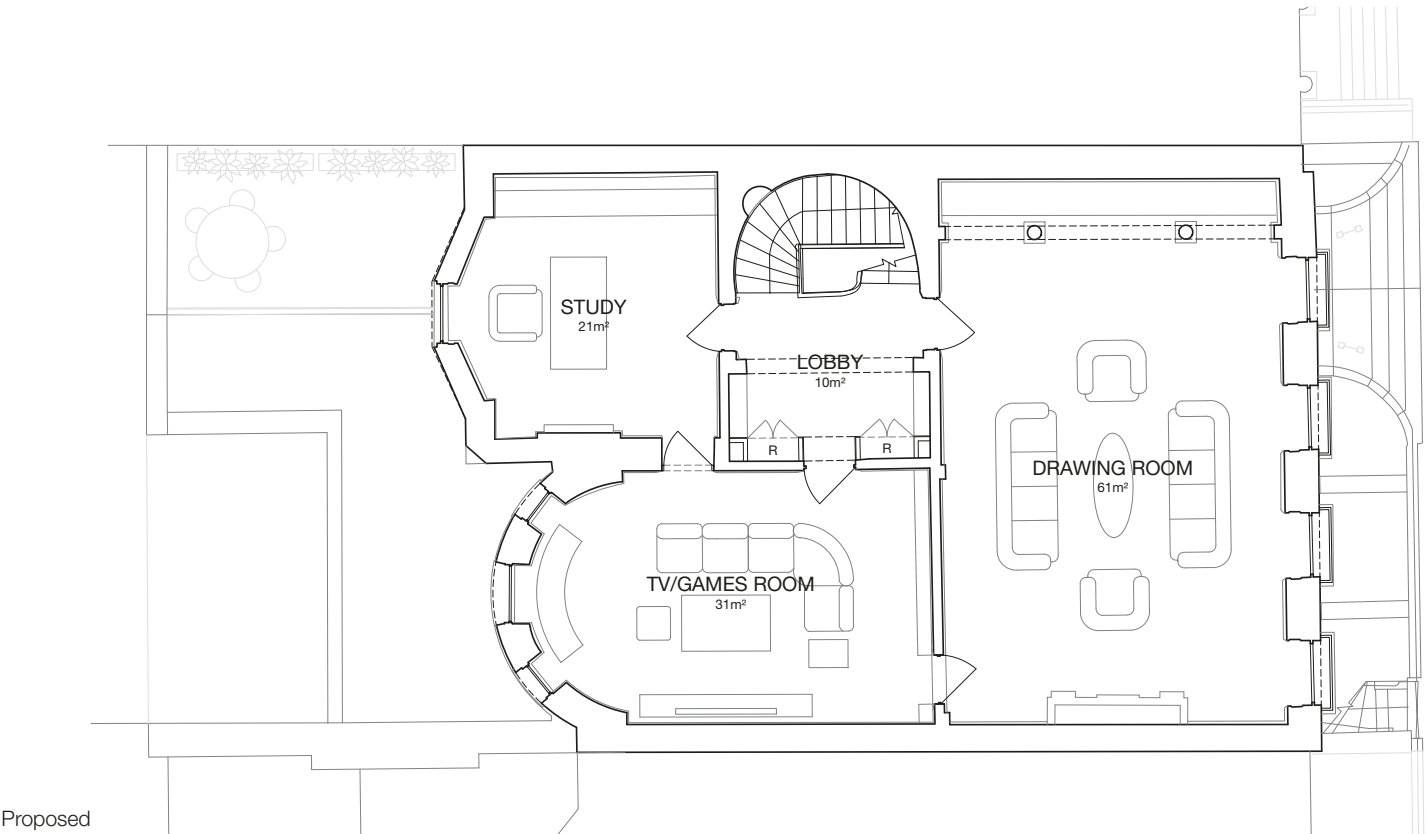
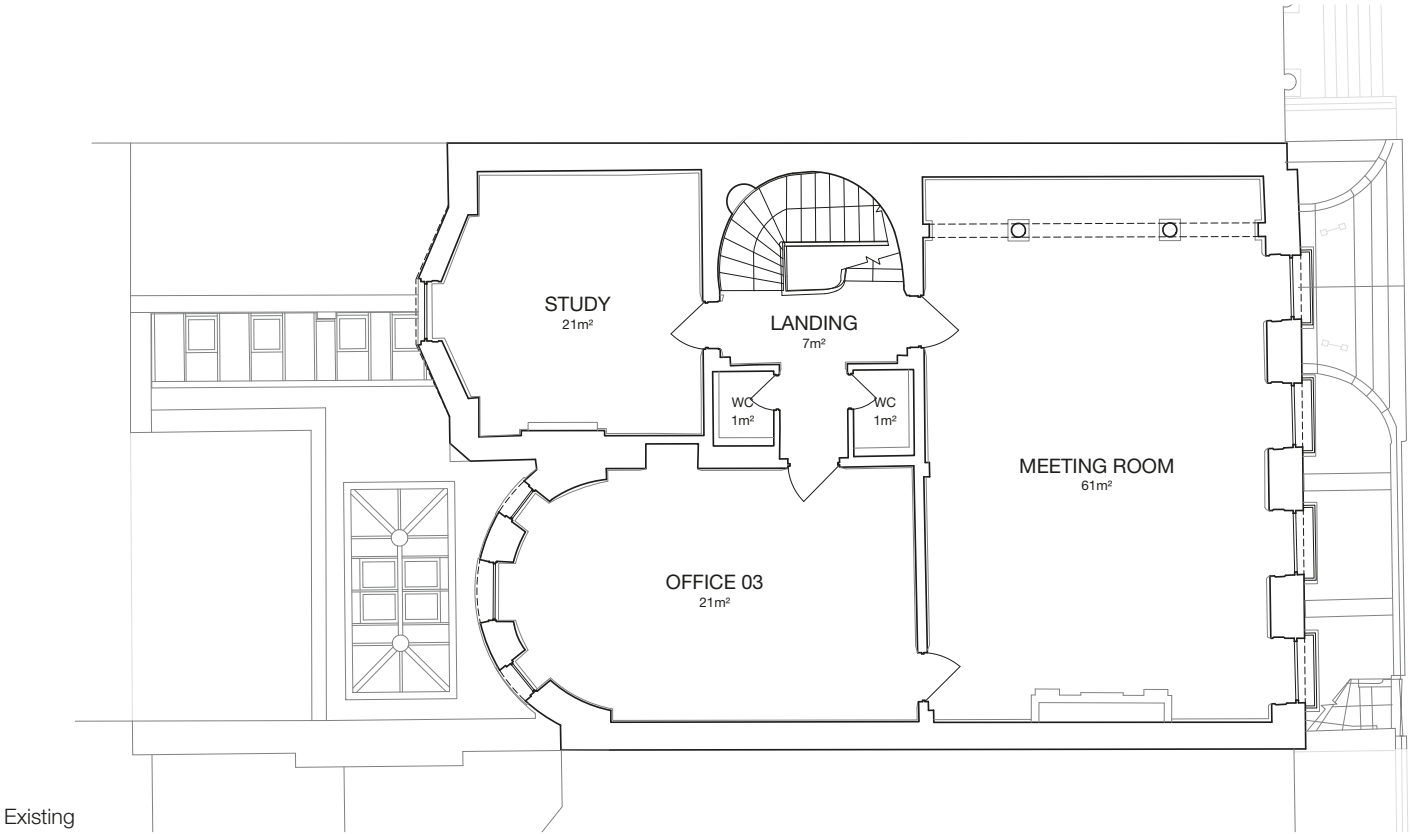
3.1.11 First Floor

Changes at first floor level are kept to a minimum. The main interventions are made to the stair landing. The modern partitions enclosing the current dual-WCs are removed in order to reinstate the large historic arched anteroom as per the historic arrangement of this floor.

The expanded anteroom leads onto the grand drawing room at the front of the property, which is maintained and its historic features restored. At the rear of the property, the larger room is converted into a TV/games room, again overlooking the garden at the rear, and the current study is maintained. The historic passage between the proposed games room and the study will also be reinstated and historic detailing restored.



Key Section



PROPOSED DEVELOPMENT

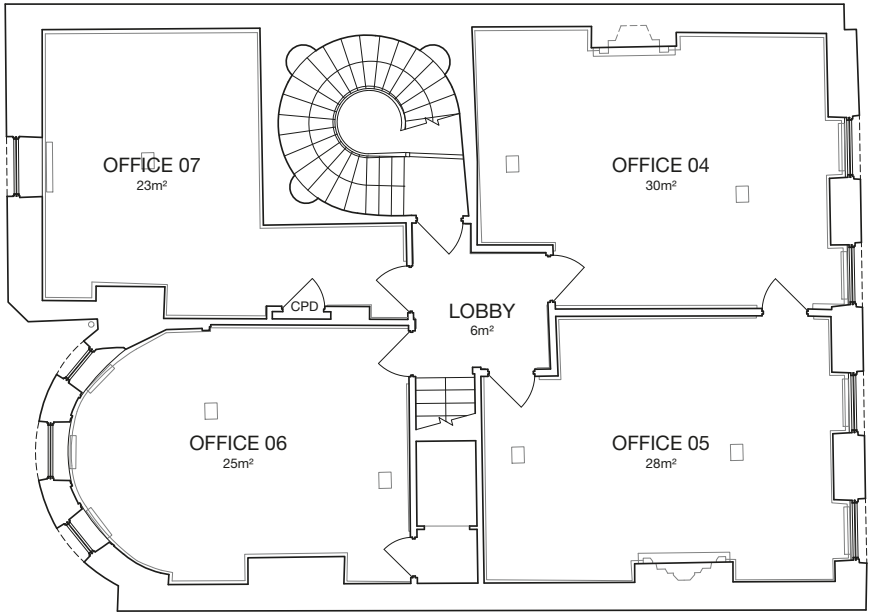
Overview

3.1.12 Second Floor

On the second floor, the four existing offices that comprise the current arrangement will be adapted to host the primary suite of the residential dwelling (the master bedroom and adjoining master bathroom and dressing room) and a second bedroom with its own ensuite.

There are relatively few interventions to the built fabric at this level. A passageway will be created underneath the stair that leads to the level above, in order to create a connection between the master bedroom and bathroom at the front and rear of the floor plate respectively. An opening will also be created between the two rooms at the rear to facilitate a direct connection between the proposed master bathroom and dressing room. Entry into two of the four rooms from the existing lobby will be slightly adjusted to ensure better clarity of access.

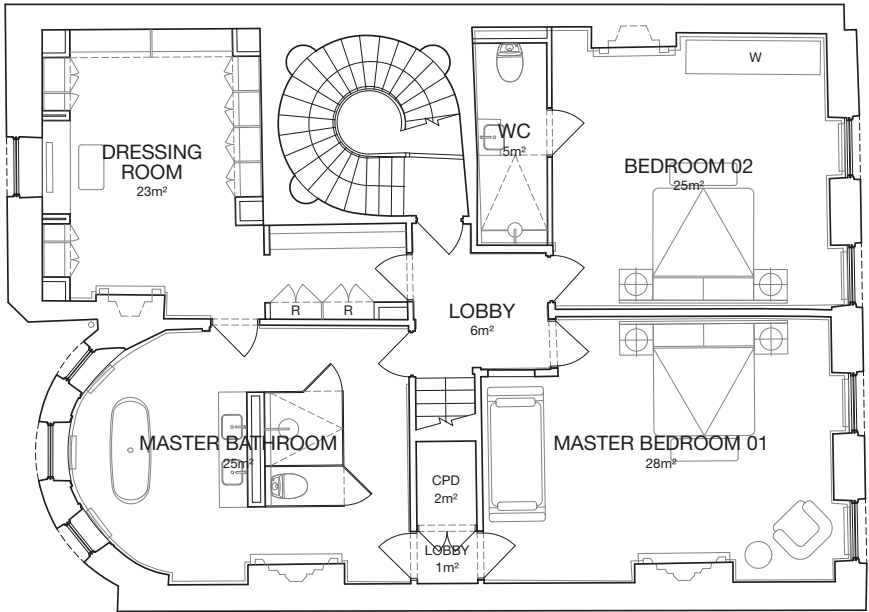
Existing fireplaces will be repaired, and where they no longer exist, appropriate fireplaces of the regency period will be installed.



Existing



Key Section



Proposed

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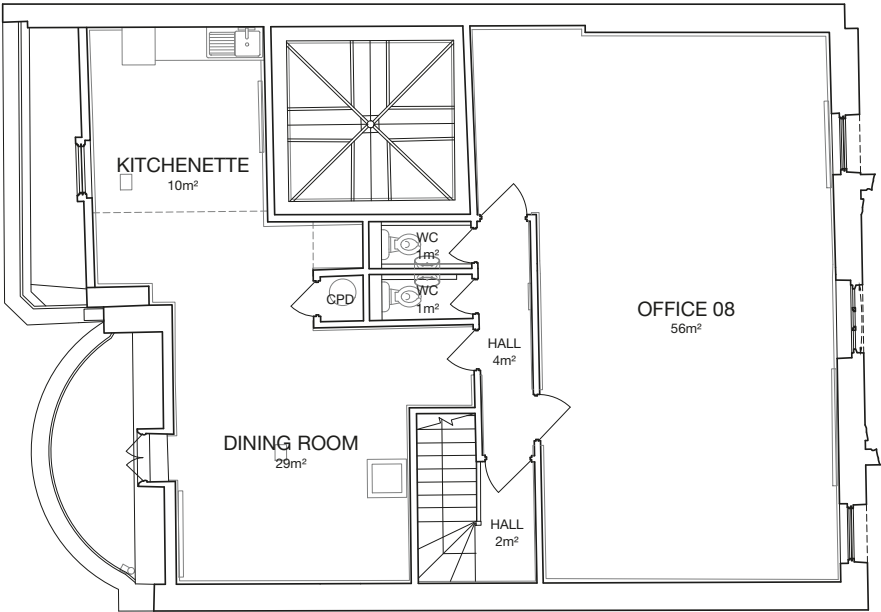
Overview

3.1.13 Third Floor

At the third floor level, an additional two bedrooms will be created by partitioning the large open space at the front of the property. A bathroom is created to the rear of one of the bedrooms, adjacent to the stairwell core, and accessible to both.

The open area at the rear of the property, which currently houses a kitchenette and small dining space, will also be subdivided. The kitchenette will be refurbished and its function maintained, while the dining room will be converted to a midsize lounge or playroom.

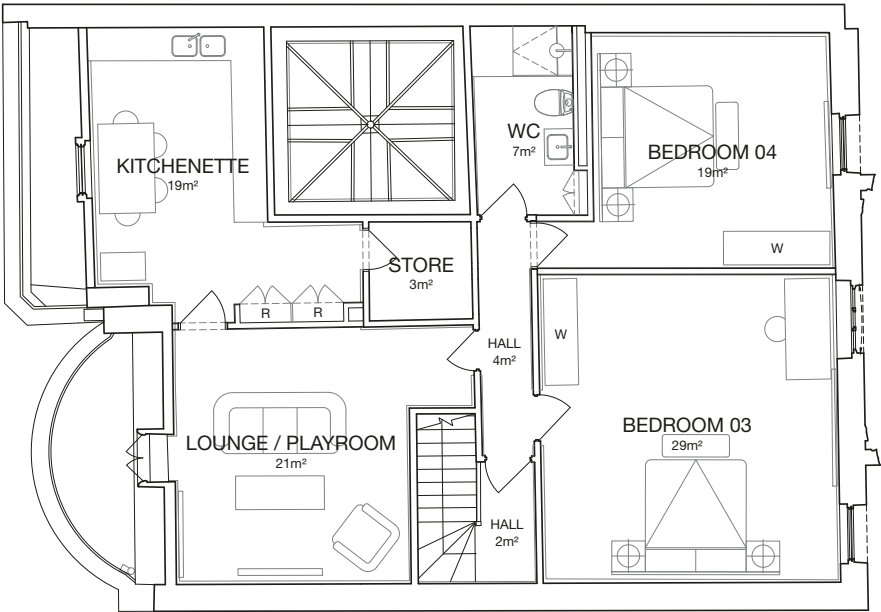
The modern partitions at the centre of the floor plate will be partly removed, with the two existing WCs combined into one store room.



Existing



Key Section



Proposed

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Overview

3.1.14 Roof

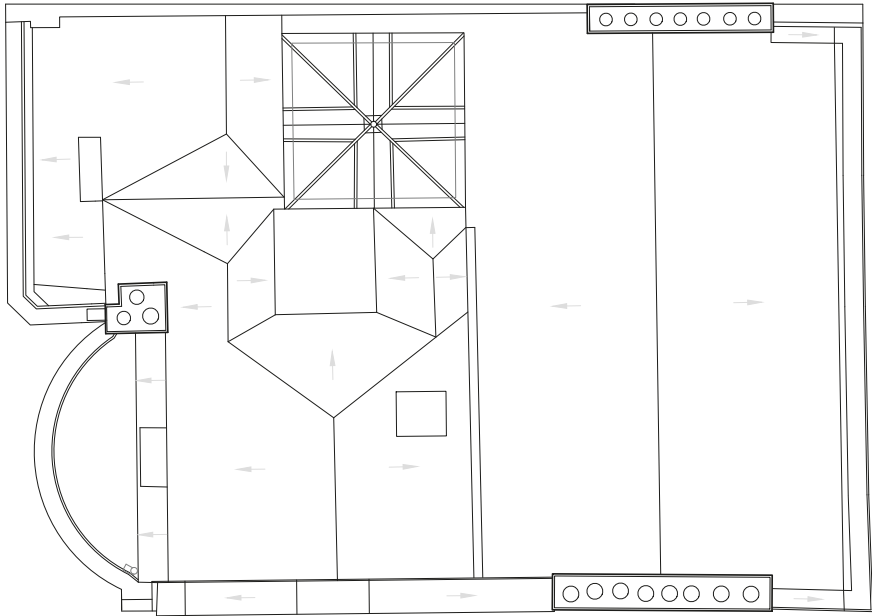
No changes are proposed to the roof of the property.



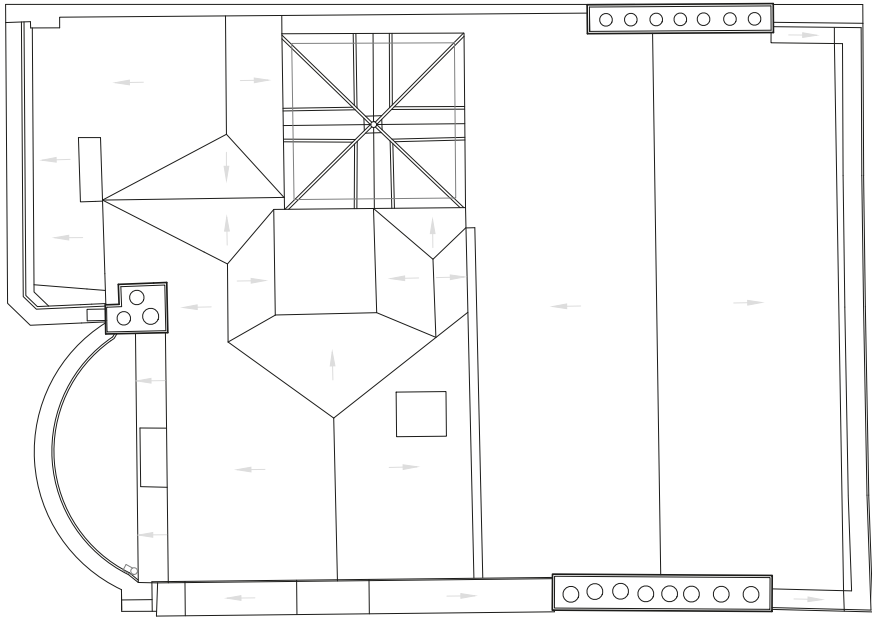
Key Section



Existing

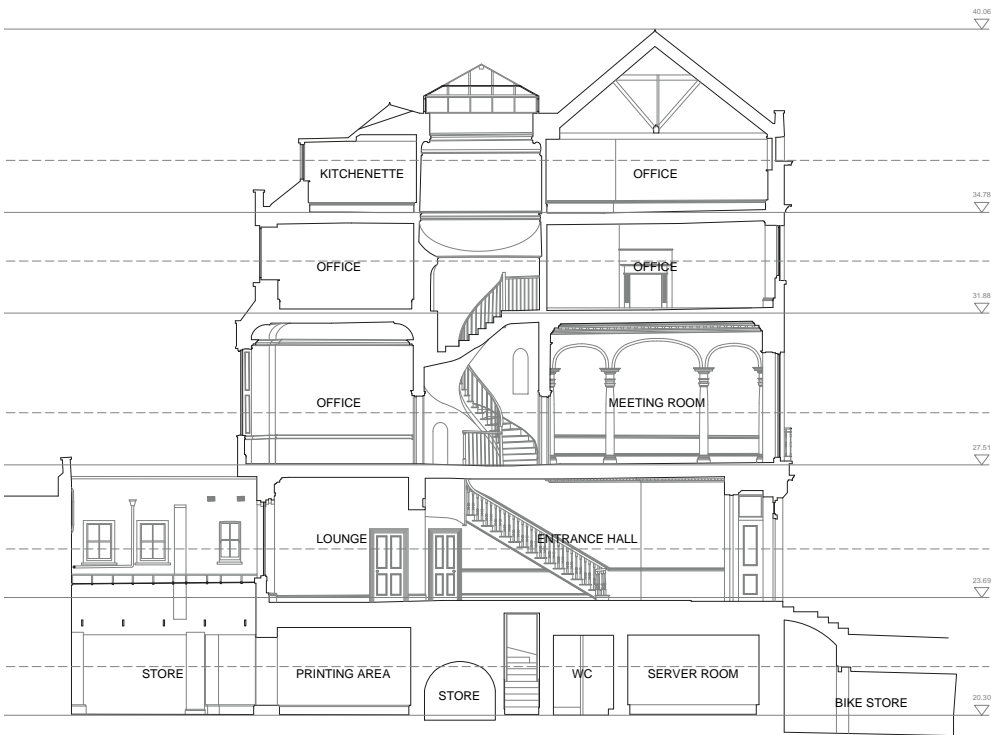


Proposed



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Overview



Existing

Section A-A



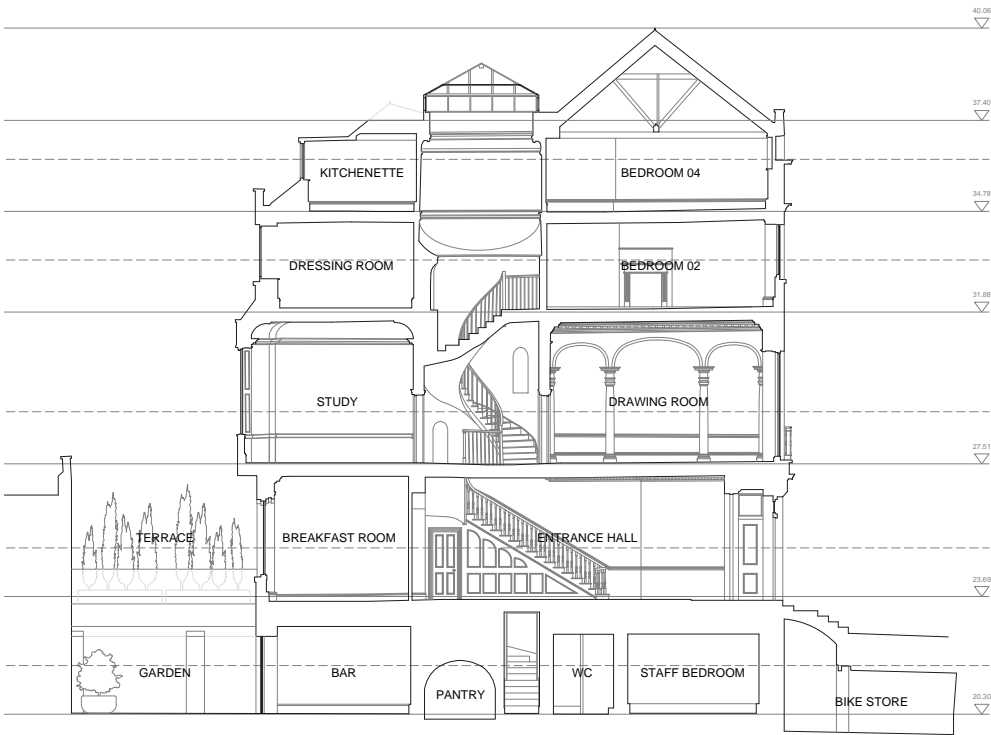
Section B-B



Front Elevation



Rear Elevation



Proposed



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3.2 Materiality

3.2.1 Proposed External Materiality

The material strategy for the external built fabric of the property will:

- As much as possible retain and refurbish existing materials.
- Where new materials are proposed, ensure that they are traditional and in keeping with the Georgian order of the existing Building, i.e. stock brick, lead flashings, cast iron rainwater good, etc.
- Where necessary replace all non-original fenestration with traditionally detailed timber windows to match existing fenestration.
- Remove all non-original elements of the external fabric, such as the modern extension (roof and skylights) to the rear of the property.

3.2.2 Proposed Internal Materiality

The material strategy for the internal fabric and finishes of the property will:

- As much as possible retain and refurbish existing materials.
- Reinstate historic period detail, in terms of craftsmanship, proportion and arrangement, in order to restore the property to the quality characteristic of the period in which it was originally built.
- Restore all original decorative mouldings, cornicing, dado rails and wall panelling where possible, piecing in and replicating to match wherever necessary.
- Reinstate traditional decorative detail that has been lost over time, ensuring it is ordered and proportionate to the period.
- Expose and utilise existing original floorboards as the floor finish to the principal floors where possible, replacing with reclaimed timber to match finish and dimensions where required.



01



02



03



04



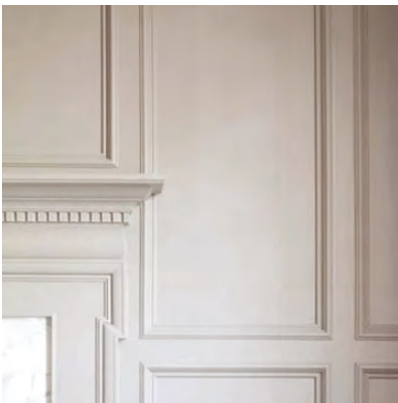
05



06



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08



09



10

- | | |
|--|------------------------------------|
| 01 Georgian sash windows | 06 Natural lighting |
| 02 Split-level external terraces | 07 Georgian period wall panelling |
| 03 Garden at lower ground floor level | 08 Georgian period wall panelling |
| 04 Living spaces at first floor level | 09 Exposed timber floorboards |
| 05 Kitchen at lower ground floor level | 10 Traditional decorative moulding |

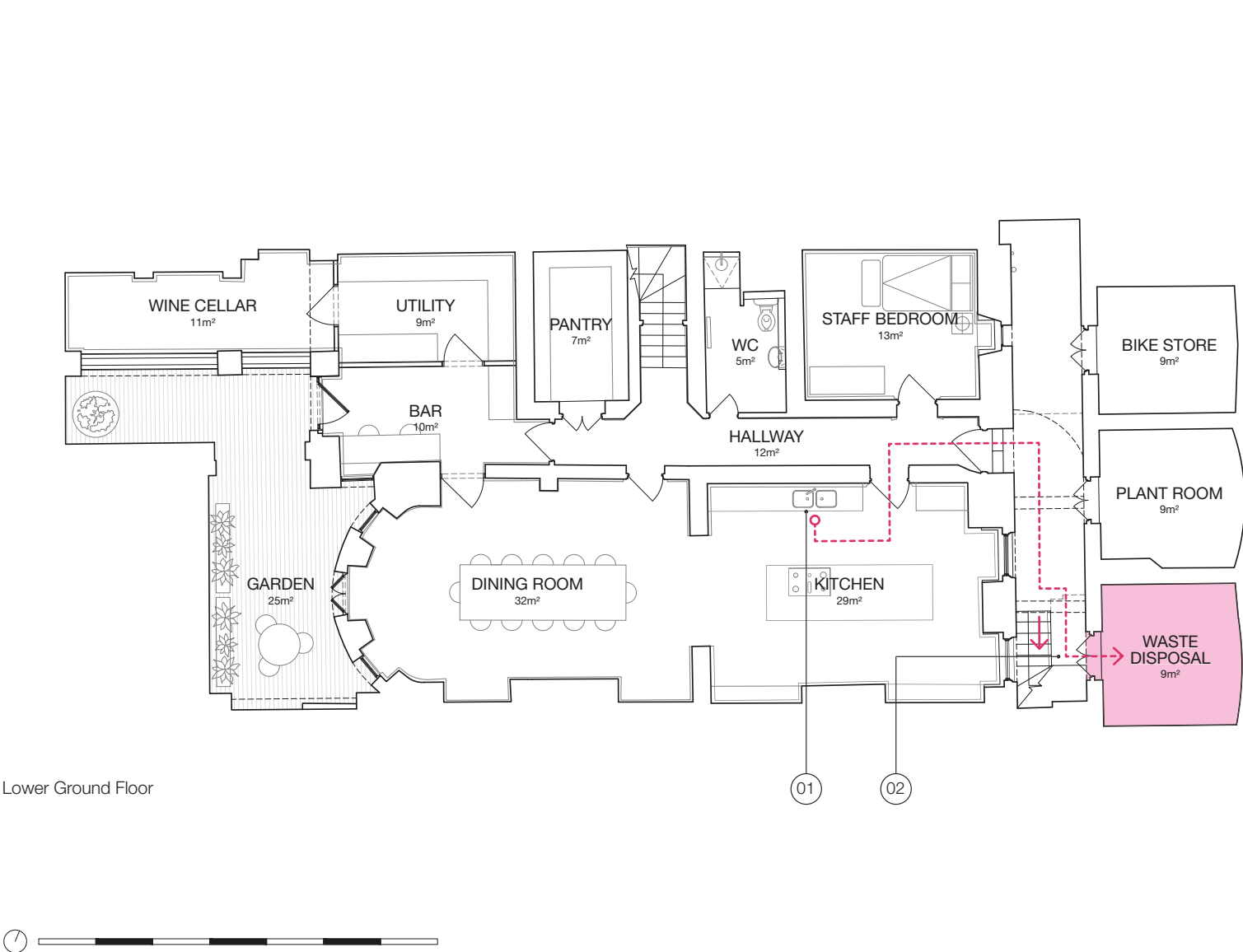
PROPOSED DEVELOPMENT

3.3 Servicing and Access

3.3.1 Waste Storage and Disposal

The kitchen units of the Proposed Development will have separate waste and recycling bins, as depicted to the right. Camden Council provides weekly waste collection services on John Street, including mixed recycling and food and garden waste picked up every Monday. The collection area is located directly outside of the property, and waste is collected before 7am. Residents can place their waste outside the property the night before, or early on Monday morning.

To ensure secure storage of waste and recycling bins, one of the three vaults at lower ground floor level to the front of the property will be used. Residents can transport refuse quickly and easily from the kitchen to the vault, which are almost directly adjacent, in advance of the weekly refuse collections.



01



02

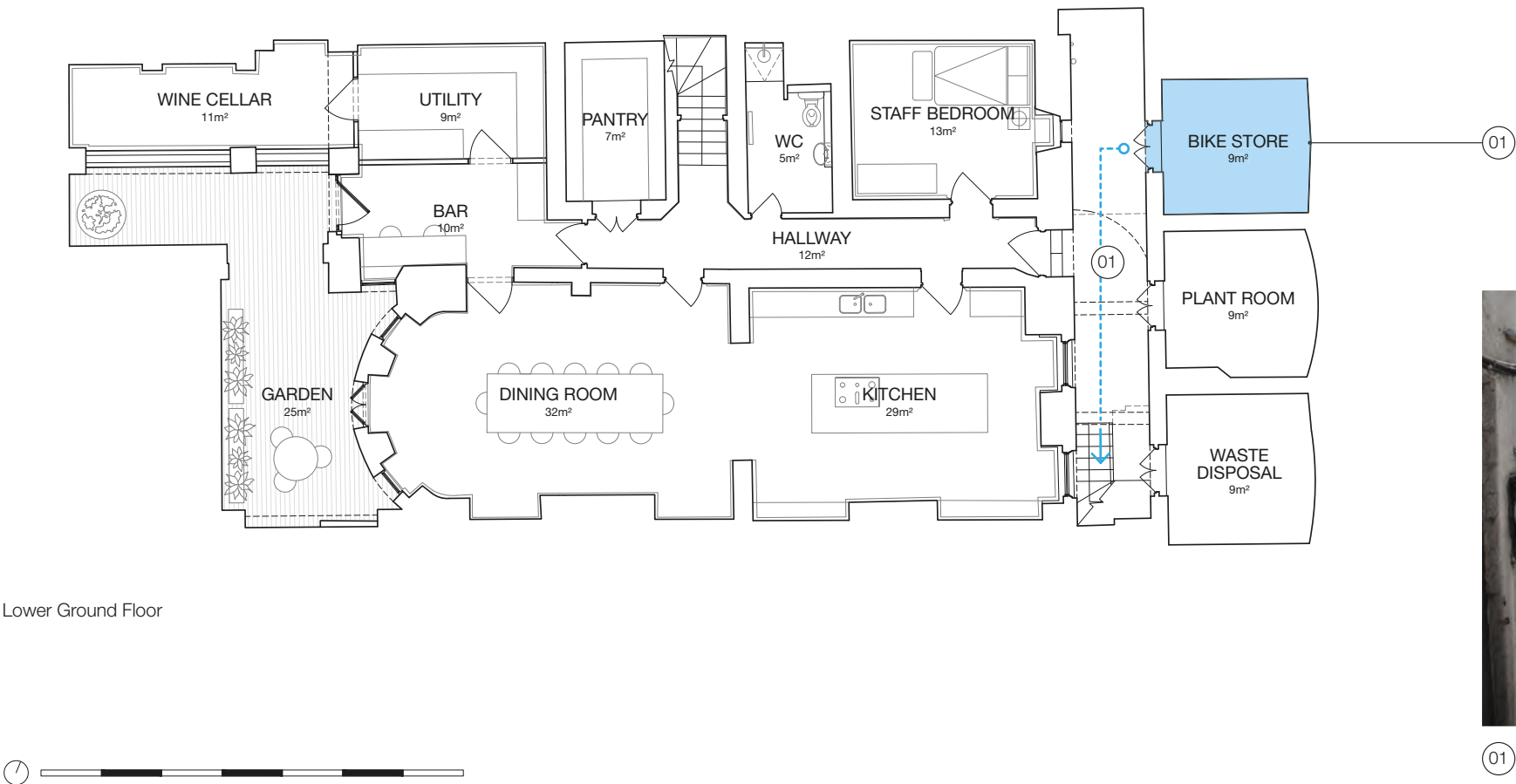
PROPOSED DEVELOPMENT

Servicing and Access

3.3.2 Bike Storage

John Street is a one-way street, with parking allocated on both sides. It falls under a controlled parking zone. The Proposed Development will be car-free, which is feasible due to the high concentration of public transportation in the vicinity, as outlined earlier in the document. This aligns with Camden's Core Strategy Policy that promotes cycling as a sustainable mode of travel, which not only helps to reduce congestion but also promotes a healthy lifestyle.

To comply with the London Plan's Cycle Parking Standards, a provision for bicycle storage has been made on the basis of two bicycles per three-or-more person dwelling. The bike store will be located within one of the three vaults at lower ground floor level to the front of the property, illustrated below.



PROPOSED DEVELOPMENT

3.4 Construction Management

3.4.1 Construction Management Plan

Due to limited access to and from the Site, it is proposed that construction access, deliveries and the storage and removal of demolition materials will be via the lower ground floor level (accessible via stair from street level down into external lightwell passage) and ground floor level (through the main Building entrance) to the 33 John Street.

It is anticipated that the Main Contractor will provide a full construction access and method statement for review and approval, prior to works commencing on site. It will be required that the site be managed and maintained throughout the construction period.

Skips will be located so as to cause no disruption to neighbouring properties. All necessary scaffolding and dust and safety protection netting provisions will be in place over the course of the construction period for the Proposed Development. It is not anticipated that the scope of the material works to the Building will cause any significant disruption.

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3.5 Area Schedule

3.5.1 Existing GIA

The gross internal area (GIA) of the existing Building is 738 m², or 7,941 sqft.

3.5.2 Proposed GIA

The gross internal area (GIA) of the Proposed Development is 698 m², or 7,513 sqft. The reduction in GIA is a result of the creation of two external spaces: the garden at lower ground level, and the terrace at ground level.

	Existing GIA		Proposed GIA	
	(Sqm)	(Sqft)	(Sqm)	(Sqft)
Basement Floor	198	2,131	168	1,808
Ground Floor	147	1,582	137	1,582
First Floor	136	1,463	136	1,463
Second Floor	133	1,431	133	1,431
Third Floor	124	1,334	124	1,334
Roof Level	N/A	N/A	N/A	N/A
TOTAL	738	7,941	698	7,618

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4.0 PLANNING POLICY FRAMEWORK

4.1 Proposed Design Planning Policy

4.1.1 Overview

In both the creation of this document and the design of the Proposed Development, planning policy at the national, regional and local level – as well as other relevant guidance – has been taken into account. This section of the statement gives a brief summary of the planning context, while the following section (*Planning Policy Assessment*) evaluates the application on the basis of the policies and guidance mentioned here.

4.1.2 National Guidance

The National Planning Policy Framework was revised in response to the Levelling-Up and Regeneration Bill reforms to national planning policy in consultation on 19 December 2023 and sets out the government’s planning policies for England and how these are expected to be applied.

On 5 September 2023 the Secretary of State for the Department for Levelling Up, Housing and Communities issued a written ministerial statement to update policy on planning for onshore wind development in England. This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018, updated in February 2019, revised in July 2021 and updated in September 2023.

The NPPF provides an outline of the Government’s planning approach, and plays a pivotal role in the decision-making process for planning applications.

The National Planning Policy Framework (NPPF) has identified that the objective of the planning system is to aid in the accomplishment of sustainable development. According to Paragraph 2 of the NPPF, preference should be given to sustainable development while making decisions, and it further explains the following:

“For decision taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

On September 5th, the Government updated the Planning Practice Guidance (PPG), which is an important factor to consider when submitting planning applications. The PPG replaces several previous circulars and guidance to provide a simplified, unified source of guidance at the national level. It is a significant factor when determining the outcome of applications.

4.1.3 Statutory Framework

Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that planning applications follow the policies of the Development Plan, except when material considerations suggest otherwise.

The statutory development plan required for the proposed site is comprised of the following:

- London Plan (March 2018)
- London Borough of Camden Local Plan (July 2017)

4.1.4 Emerging Policy

The current Local Plan was adopted in July 2017 and forms the basis of the strategic and development management policies shaping planning decisions. The Council is currently consulting on a draft new Local Plan, with the consultation period running from January 17th to March 13th, 2024. This draft plan outlines Camden’s vision for the future development for the next fifteen years, and includes planning policies and site allocations.

PLANNING POLICY FRAMEWORK

Proposed Design Planning Policy

4.1.5 Regional Guidance

The Greater London Authority (GLA) has released several supporting documents that are pertinent to the assessment of this application. Of significance are:

- SPG: Social Infrastructure
- SPG: Accessible London: Achieving an Inclusive Environment
- SPG: The Control of Dust and Emissions during Construction and Demolition
- SPG: Shaping Neighbourhoods: Character and Context (June 2014);
- SPG: London Planning Statement (May 2014);
- LPG: Planning for Equality and Diversity in London (2021).
- SPG: Housing (2016);
- LPG: Housing Design Standards (2023);
- LPG: Air Quality Neutral (2021);
- LPG: Whole Life-Cycle Carbon Assessments (2022).

4.1.6 Local Guidance

The Local Borough of Camden has a number of adopted guidance documents which are material considerations in respect of the proposed application, including:

- Access for All CPG (March 2019);
- Air Quality CPG (January 2023 - 2026);
- Amenity CPG (January 2021);
- Design CPG (January 2021);
- Developer Contribution CPG (March 2019);
- Employment Sites & Business Premises CPG (January 2021);
- Housing CPG (January 2021);
- Transport CPG (January 2021).

The following document outlines the key issues relevant to determining the application, and examines them in the context of relevant policy guidelines.

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5.0 PLANNING POLICY ASSESSMENT

5 PLANNING POLICY ASSESSMENT

5.1 Assessment of Proposed Development

5.1.1 Suitability for Continued Business Use

Policy E2 considers the suitability of the premises for office use, which is also considered against the relevant parts of the Employment CPG.

The Building is in relatively good condition. However, the prospect of it meeting the modern expectations of a commercial tenant is constrained owing to its having been originally designed as a residential dwelling. As aforementioned, the rooms of the property are small by modern office standards, thereby presenting considerable limitations when attempting to enhance the property's appeal to potential tenants. The property's listed status means that the possibility of open-plan and flexible working spaces is foreclosed due to any such conversion to the desired kinds of spaces requiring significant alteration to the existing built fabric, if indeed such a conversion is possible at all.

The need for health and wellbeing facilities like outdoor areas, well-ventilated working spaces, showers and changing facilities, bike racks and storage space has risen considerably. However, the current property does not have the necessary infrastructure to offer these amenities, and any attempts to renovate may not produce facilities adequate enough (and enough to cater to all occupants) without reducing usable floor area considerably. The services provided by the building are insufficient to meet current market demands.

The continued commercial use of the Building faces additional challenges, such as insufficient natural lighting and a lack of energy efficiency. Existing heating, lighting, bathroom, kitchen and IT facilities are also dated, and would all require replacement to meet the standard of the modern office occupant. These make it considerably more difficult to meet contemporary office space requirements, including achieving the desired BREEAM rating.

Accessibility is also a concern, with accessibility to the property currently poor (the property cannot be easily accessed or circulated through by those with mobility issues), which further reduces its commercial viability. Again, owing to the heritage concerns surrounding the fabric of the property, improving accessibility (by, for example, installing an internal lift) would be complex and require significant alteration of the existing fabric.

5.1.2 Possibility of Alternative Use

The original layout of the residential townhouse constrains the location of washrooms and kitchens on the premises. As noted above, the introduction of additional facilities would negatively impact the functionality of the property as an office space. Alternative uses would likely require enhanced accessibility, but as noted above, installing an internal lift to provide access throughout the property would involve significant modification to the plan form; on the flipside, to heritage considerations may mean that any external modifications or additions to the building fabric externally to provide level

access may be considered contentious or deemed unacceptable. Other non-office business uses – such as industrial, warehousing, storage, and research functions – would also clearly not be appropriate in this context.

5.1.3 Financial Contributions

As noted in Paragraph 54 of the CPG, the Council may seek a contribution from developments that result in the loss of more than 500sqm (GIA) of employment floorspace towards measures that create or promote opportunities for employment or training of local people. As the property falls above this threshold, at 780sqm (GIA), a payment in lieu will be required to contribute to the loss of commercial office space.

5.1.4 Alternative Use as Residential

Local planning authorities are strongly encouraged to consider applications for alternative uses of land that is currently developed but not assigned for a specific purpose, particularly in areas where there is high demand for housing. However, it is important to ensure that such changes do not have any adverse effect on key economic sectors or sites, or on the vitality and viability of town centers, and should align with the policies in this Framework, as stated in NPPF Paragraph 123.

Further details on the residential development in this location are provided below. Over the past few years, many properties in the Bloomsbury area, such as John Street, Great James Street, and the surrounding mews, have been granted planning permission for conversion from offices to their original use as residential townhouses. Many of these properties are in long terraces that are gradually regaining their former grandeur as primarily residential areas. 33 John Street can also be expected to follow this trend.

When considering developments that affect listed buildings, it is important for local planning authorities to give special consideration to the preservation of the building or its setting, or any features of special architectural or historic interest that it may possess, as stated in Historic England's Listed Building Consent advisory document (June 2021).

5.1.5 Principle of Residential Development

The Proposed Development aligns with the prevailing direction of planning policy at the national, regional, and local levels, emphasising the attainment of sustainable development. Notably, the adopted plan policy in Camden explicitly prioritises housing as a key land use.

According to the National Planning Policy Framework (NPPF), housing delivery is a primary objective, emphasising the need for a significant increase in the supply of housing. Local planning authorities are required to identify an adequate supply and mix of sites, considering their availability, suitability,

and economic viability. They must maintain a supply of deliverable sites for at least five years against housing requirements, with provisions for up to 15 years, including a buffer for market choice and competition.

The NPPF also recognises the importance of small and medium-sized sites in meeting housing requirements. London Plan Policy H1 underscores the necessity for 66,000 additional homes annually, with a specific target of 1,038 new homes per year in Camden.

London Plan Policy H2 emphasises the role of small sites in housing delivery, setting an annual target of 328 new homes in Camden. At the local level, Policy H1 aims to maximise housing supply, exceeding the target of 16,800 additional homes by 2030/31.

The historical context of the site supports the principle of residential use, since the Building was originally intended as a residential dwelling and was converted to offices in the twentieth century. The proposed conversion back to residential use aligns with planning and heritage considerations.

Reinstating a townhouse at this Site adheres to the development plan's objectives and contributes to meeting housing delivery targets. Its strategic location, close to other residential use, further supports the proposal.

5.1.6 Affordable Housing

Paragraph 64 of the National Planning Policy Framework (NPPF) requires planning policies to specify the type of affordable housing needed and set rules for meeting this need on the development site itself. This is unless providing affordable housing off-site or paying a financial contribution instead can be strongly justified, and the chosen approach helps create mixed and balanced communities. Affordable housing is not however required for residential developments other than those considered 'major developments' (except in rural areas), as described in Paragraph 65 of the NPPF.

Local Plan Policy H4 (Maximising the Supply of Affordable Housing) aims to build 5,300 additional affordable homes between 2016 and 2031, with a variety of affordable housing types. The London Borough Council (LBC) expects all developments involving housing and creating one or more additional homes to contribute to affordable housing.

Policy H4 states that affordable housing should be provided on-site whenever possible, with off-site options or financial contributions only allowed in exceptional circumstances, as detailed below.

The guideline mix from Policy H4 is 60% social-affordable rented housing and 40% intermediate housing. Targets are based on an assessment of development capacity, considering that 100sqm (GIA) of housing generally allows for one home. The Policy specifies:

PLANNING POLICY ASSESSMENT

Assessment of Proposed Development

a. the guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing;

b. targets are based on an assessment of development capacity whereby 100sqm (GIA) of housing floorspace is generally considered to create capacity for one home;

c. targets are applied to additional housing floorspace proposed, not to existing housing floorspace or replacement floorspace;

d. 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;

e. an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings;

f. for developments with capacity for 25 or more additional homes, the Council may seek affordable housing for older people or vulnerable people as part or all of the affordable housing contribution;

g. where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;

h. for developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site;

i. where affordable housing cannot practically be provided on site, or off-site provision would create a better contribution (in terms quantity and/ or quality), the Council may accept provision of affordable housing off-site in the same area, or exceptionally a payment-in-lieu.

The Proposed Development would create a single residential unit within a listed building at 780 sqm (GIA). This internal area would offer capacity for only four homes according to Policy H4's calculation. A financial contribution instead of affordable housing is therefore acceptable for this Site.

5.1.7 Housing Mix

The National Planning Policy Framework (NPPF) mandates the provision of housing in various sizes, types, and tenures to meet the diverse needs of different groups in the community. This includes affordable housing, family homes, homes for the elderly, and students.

Paragraph 74 (b) of the NPPF aims to ensure that the size and location of homes support a sustainable community and that a range of homes are available. Policy H6 of the London Plan emphasises the importance of a mix

of units in housing schemes, taking into account a range of qualitative criteria such as the location of the site, the nature of the development, and the need for affordable housing. Policy H6 does not require boroughs to set specific dwelling size mix requirements for market and intermediate homes, although it recommends avoiding schemes consisting mainly of one-bedroom units.

Policy H7 of the Local Plan seeks to provide a range of homes of different sizes to create mixed, inclusive and sustainable communities. It also aims to mitigate mismatches between housing needs and the existing supply. The policy requires all housing development to contribute to meeting the priorities set out in the Dwelling Size Priorities Table, which includes a high priority for two and three-bedroom market units. Policy H7 also allows the LBC to take a flexible approach to assessing the mix of dwelling sizes proposed in each development, considering several factors.

The Proposed Development under consideration offers a single four-bedroom dwelling, which aligns with Camden's priority for family accommodation. Although the site cannot provide a mix of units, it meets the objectives of Policy H7 by offering a higher priority family housing unit. The four-bedroom property is appropriate, given the building's historic form and layout and the advantages offered by reinstating it as a single-family dwelling.

5.1.8 Housing Design

Housing developments in London are required to meet high-quality standards as per the London Plan's Policy D6. This policy mandates that the design of the housing units should be of the highest quality and compatible with the surrounding environment. Furthermore, the housing units should have rooms that are adequately sized with layouts that are convenient and practical. This ensures that residents can enjoy comfortable and functional living spaces.

According to the policy, Local Development Frameworks (LDFs) are obligated to incorporate minimum space standards that align with Table 3.1 of the London Plan, equivalent to space standards established by the government.

Additionally, the policy mandates that LDFs must integrate minimum space standards that generally comply with Table 3.1 of the London Plan, comparable to the Nationally Described Space Standards established by the Government. This ensures that the minimum requirements for living spaces are met in a consistent and standardised manner.

The Proposed Development features a spacious layout that surpasses the prescribed space requirements for a residential property with four bedrooms and spread across five levels.

It should be noted that London Plan Policy D6 mandates that development should aim to maximise the use of outdoor amenity spaces. Furthermore, according to the Mayor's Housing Supplementary Planning Guidance (2016),

a minimum of 5 sqm of private outdoor space must be provided for 1-2 person dwellings, with an additional 1 sqm for each additional occupant (as per Standard 4.10.1).

It has already been discussed how the current form of the Building in question faces limitations due to limited access to external space. In order to address this, the Proposed Development recommends the reinstatement of the external space at lower ground floor level at the rear of the Building, as per its historic arrangement. A small external terrace has also been incorporated at the rear of the property at ground floor level. Both of these will allow residents to access the outdoors while ensuring their privacy.

The rear terraces have been designed with consideration to the site's context and its status as a listed building. The provision of this external space should be deemed acceptable, given the limitations of the site and the need to ensure that the residents have access to the outdoors. Overall, the proposed development meets the needs and expectations of the residents while taking into account the site's limitations and context.

5.1.9 Design Principles

In order to achieve sustainable development and enhance the quality of life of communities, there is a strong emphasis on promoting high-quality and inclusive design at all levels of policy.

The National Planning Policy Framework (NPPF) recognizes the crucial role that good design plays in these efforts, and has laid out specific standards that must be met for any proposed development. These standards are outlined in Paragraph 131 of Part 12 of the NPPF, which highlights the importance of good design in developments.

Chapter 3 of the London Plan outlines the Mayor's comprehensive policies that address various concerns related to the places and spaces in London. These policies aim to enhance the livability, sustainability, and overall appeal of the city's built environment while ensuring the well-being of its residents.

In accordance with Policy D5 (Inclusive Design), all new development projects undertaken in London must adhere to the highest standards of accessible and inclusive design. This policy aims to ensure that the built environment in London is designed and constructed in such a way that it can be used and enjoyed by all members of the community, regardless of their age, physical ability or other individual needs.

Furthermore, Policy D1 (London's Form, Character and Capacity for Growth) emphasises the importance of understanding the existing character and context of individual areas when planning for future development. It recognises that different areas of London have unique identities and characteristics, and that any new development should be sensitive to and respectful of these

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particularities. By taking into account the context of each area, planners and developers can ensure that any new development is appropriate, sustainable and contributes positively to the community as a whole.

The Building under consideration has a rich history and heritage, and as such is recognised as a Grade II-listed building. However, due the limitations of certain aspects of its architectural design, it is currently not feasible for the property to meet the requirements of the Building Regulations with respect to access. Consequently, and as aforementioned, it is not possible to provide step-free access throughout the building. As per the policy requirements, the Proposed Development incorporates a thoughtful and considerate approach to the design, introducing alterations to the building that are well-suited and mindful of its unique historical character and significance.

5.1.10 Heritage Considerations

In accordance with Paragraph 200 of the National Planning Policy Framework (NPPF), the following is emphasised:

“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.”

According to the LBC Local Plan Policy D2, it is the responsibility of the council to safeguard and promote the borough’s rich and varied heritage assets and their surroundings. This includes the conservation areas, listed buildings, archaeological remains, scheduled ancient monuments, historic parks and gardens, and locally listed heritage assets. The council aims to preserve these valuable assets and make necessary improvements wherever possible, ensuring that they remain an integral part of the community’s cultural identity and heritage.

In relation to conservation areas, Policy D2 states the following. It 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;

In relation to listed buildings, Policy D2 states the following. It will:

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 the significance of a listed building through an effect on its setting.

Alongside the Application Drawings (Appendix 7.2, 7.3, 7.4) and this Design and Access Statement, the Heritage Statement (Appendix 7.6), prepared by Giles Quarme Architects, should also be read in conjunction with this Planning Statement. This provides a comprehensive understanding of the Proposed Development and its impact on the heritage aspects of the Site.

The Proposed Development has been designed with the objective of restoring the house to its original use as a single-family dwelling. The restoration work has been planned in such a way that it will have no adverse impact on the heritage value or significance of the Building. As aforementioned, the reinstatement of the Building to its original residential use would result in a host of tangible heritage benefits, contributing significantly to the architectural and historic interest of the Grade II-listed building.

The restoration work will involve the active conservation and repair of some lost architectural features such as panelling and chimney pieces. Any original elements that are deemed beyond repair will be replicated using like for like materials and carefully restored, ensuring the restoration of the Building’s character and historic fabric as a dwellinghouse.

Externally, the appearance of the Building and the enhancement of its character will be achieved by restoring all aspects of the front elevation of the Building, including appropriately detailed early Georgian double-hung sash windows. At the rear of the property, the reinstatement of the external space at lower ground floor level further respects the Building’s heritage and removes some additions that have caused harm to the historic fabric.

Internally, all historic rooms will be retained, with no radical alterations to the floor plans, whose original form and proportion will be restored. The Proposed Development involves minor modifications, including some new partitions, but there will be no loss of historic fabric or any feature that contributes negatively to the character and special interest of the listed building. All new partitions will be installed such that they can be easily removed in the future, and the historic volume and footprint can be restored.

5.1.11 Residential Amenity

The Local Plan Policy A1 aims to ensure appropriate management of the impact of development on the quality of life of both occupiers and

neighbours. The policy grants permission for development projects, provided they do not cause any unacceptable harm to amenity.

Furthermore, the policy clearly states that the Local Borough Council (LBC) will take all necessary measures to ensure that the development project adheres to the aforementioned guidelines and does not negatively impact the quality of life of the surrounding occupants and neighbours.

Factors that will be taken into consideration include:

- (i) visual privacy, outlook;
- (j) sunlight, daylight and overshadowing;
- (k) artificial lighting levels;
- (l) transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;
- (m) impacts of the construction phase, including the use of Construction Management Plans;
- (n) noise and vibration levels;
- (o) odour, fumes and dust;
- (p) microclimate;
- (q) contaminated land; and
- (r) impact upon water and wastewater infrastructure

The Proposed Development is focused on restoring the original look and feel of the property. It proposes the removal of the modern rear extension at the lower ground floor level, in order to reintroduce an external space and in doing so partially restore the original facade line. This development has been designed in a manner that avoids any issues related to light or overlooking of adjacent properties. It should be noted that no new windows at upper levels, which may overlook neighbouring properties, are intended to be added.

The primary objective of the Proposed Development is to ensure that future residents are provided with appropriate amenities, most significantly an allocation of private outdoor space, while limiting any impact on neighbouring residential and other uses’ amenities. Proposed alterations to the Building will not impact amenities currently enjoyed by nearby residents and occupiers. The project aims to limit potential impacts from noise and odour during construction. Furthermore, mitigation and management procedures will be put in place during the construction and later operation of the Building, to ensure that the health and wellbeing of the local area is maintained.

5.1.12 Transport

Paragraph 114 of the NPPF states that the following consideration should be given to development proposals:

a) appropriate opportunities to promote sustainable transport modes can be taken up, given the type of development and its location;

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b) safe and suitable access to the site can be achieved for all users;

c) 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 Code⁴⁸; and

d) 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.

Policy T1, which outlines the strategic approach to transportation, describes how development proposals should be designed to facilitate efficient and effective transportation, aiming to achieve “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.” Furthermore, all new development must maximise land use, taking into account connectivity and accessibility by current and future modes of public transportation, cycling, and walking, and ensuring that any negative impact is minimised.

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.

Local Plan Policy T1 is the key transport policy at the local level that promotes sustainable transport in the borough. The policy aims to ensure that development is integrated with the transport network and supported by adequate walking, cycling, and public transport links.

The Site is located in Central London and benefits from excellent public transport accessibility that provides superb connections to the Underground, National Rail, and bus services. The area has a high level of public transport accessibility, and there is minimal reliance on private cars. The Proposed Development, which will not provide any car parking, is therefore unlikely to result in any significant effect on the highway network local to the Site.

As a dwellinghouse, the Proposed Development will result in only a few weekly deliveries of food or parcels, which are not likely to have a detrimental impact on the local highway network’s operation. There are, therefore, no highway or transport reasons to resist the development proposal, and it is unlikely to have a material effect on the highway network in the Site’s vicinity.

5.1.13 Car Parking

The National Planning Policy Framework (NPPF) requires local authorities to carefully consider the provision of parking spaces in new developments, taking into account accessibility and public transport availability. Additionally, they should help to make ultra-low emission vehicles available.

The Mayor of London’s Policy T6 on parking in London aims to limit car parking in line with the availability and convenience of public transportation. The policy emphasises car-free development, but it still requires disabled parking spots to be provided.

The Local Plan Policy T2 requires all new developments in the borough to be car-free and limits the availability of parking. The policy also encourages the redevelopment of existing car parks for alternative uses. Car parking should, however, still be available for essential operating or servicing needs and for designated spaces for disabled people.

The Proposed Development does not incorporate any provisions for car parking. This is because of its excellent location, which is highly accessible via several different modes of public transportation. The absence of designated car parking facilities is appropriate for the area, as it encourages residents to take advantage of public transportation, as well as to cycle or walk wherever appropriate.

5.1.14 Cycle Parking

The NPPF and the London Plan encourage sustainable cycling. According to London Plan Policy T5, the Mayor’s goal is to promote cycling in the capital. The policy states that developments should include facilities for cycle parking and changing. In addition, the provision of secure, integrated, convenient, and accessible cycle parking facilities must meet the minimum standards.

Policy T5 also outlines that for C3-C4 use class (all dwellings), two long-stay cycle parking spaces are required within the development. This requirement is met by providing two or more cycle spaces within one of the vaults to the front of the property at the lower ground floor level. Short-stay cycle parking will not be required on this development.

5.1.15 Sustainability

The National Planning Policy Framework (NPPF) advocates for a transition towards a low-carbon future in the midst of a changing climate. It also takes into account the risk of flooding and coastal changes. Furthermore, it promotes the usage of existing resources like repurposing existing buildings and integrating renewable resources.

The London Plan sets out some policies for reducing carbon dioxide emissions and ensuring sustainable energy provision in significant developments. The Proposed Development is a ‘minor’ scheme that involves converting and renovating a listed building to create a single dwellinghouse.

The London Plan encompasses a variety of policies that have been adopted and are relevant to the sustainability of development, including SI 4, which pertains to managing heat risk, and SI 7, which is focused on reducing waste

and promoting a circular economy. It should be noted that certain policies of the Greater London Authority are deemed unsuitable for application in minor developments.

Policy CC1 of the Camden Local Plan mandates developers to minimise the impact of climate change at the local level. Moreover, the policy encourages developers to adhere to the highest possible environmental standards that are economically viable during both the construction and the operation of the development. The London Borough of Camden is committed to promoting zero-carbon development as per the London Plan, which requires all development projects to reduce carbon dioxide emissions by following the steps of the energy hierarchy.

The Local Plan Policy CC2 (Adapting to Climate Change) mandates that development projects should be resilient to climate change and adopt suitable adaptation measures. However, many of the measures outlined in the policy may not be applicable to smaller projects. Policy CC2 also requires development schemes to demonstrate how they have incorporated adaptation measures and sustainable development principles into their design and implementation. The policy expects domestic developments with a floor space of 500sqm or more to achieve an “excellent” rating in BREEAM domestic refurbishment.

Although due to its Grade II-listed status, the Building is exempt from Building Regulations Part L requirements, the Proposed Development has been designed with the goal of minimising operational energy and carbon emissions. The focus will be on minimising the embodied carbon content of materials as much as possible.

The design of the Proposed Development prioritises reducing energy consumption and using energy more efficiently. However, it cannot connect to a low carbon heat network due to its Grade II listing, lack of space, and nature of the Building. Therefore, the use of renewable energy sources is challenging and has been deemed unfeasible. The feasibility of using Low or Zero Carbon (LZC) technologies is also limited by certain constraints. The GLA cooling hierarchy has been followed, and as such there is no active cooling proposed.

The objective of the Proposed Development is to minimise the usage of both internal and external potable water, as well as to discourage the disposal of waste to landfill by implementing good waste management practices during both the operation and construction phases.

The sustainability strategy for this conversion is based on the use of more efficient services and maintenance to ensure efficient operation. Throughout the building, high-efficiency equipment and appliances will be installed, although there are some limitations to the use of further technologies due to certain building constraints.

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5.1.16 Waste and Recycling

Camden Local Plan Policy CC5 (Waste) has a goal to transform Camden into a low-waste borough by decreasing the amount of waste generated in the borough and by increasing recycling and material reuse to meet the London Plan targets of 50% household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031. The policy also aims to ensure that developments contain waste and recycling storage and collection facilities

To store waste and recycling bins, large kitchen storage units with separate compartments will be installed. The waste is collected before 7am on Monday mornings, with the collection point located right outside the property. Residents can choose to leave their waste outside the property the night before or early in the morning. As aforementioned, one of the three vaults at lower ground floor level to the front of the property will provide secure storage of waste and recycling bins. Until the weekly refuse collection on Monday, residents will transport refuse from the kitchen to the vault.

5.1.17 Community Infrastructure Levy

The application under consideration has been designed to take into account the 'MCIL2' requirements that have been in effect since April 1, 2019. These requirements include a charge rate of £80/sqm for residential floorspace.

It is important to note that LB Camden has recently adopted its Community Infrastructure Charging Schedule in December 2021. This schedule sets out a charge rate of £644 per square meter for residential developments in Zone A (Central), and has been in effect since January 1, 2022.

As part of the application process, a CIL Form will be submitted to ensure full compliance with the aforementioned requirements and charges.

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6.0 CONCLUSIONS

6 CONCLUSIONS

6.1 Key Benefits

6.1.1 Key Benefits

This Design and Access Statement has comprehensively outlined the design rationale behind the Proposed Development. The conversion of 33 John Street from its present commercial use to its original residential use – alongside its refurbishment and the repair of its historic fabric – will transform its underutilised commercial premises into a high-quality single occupancy home. The Proposed Development has been undertaken by employing a design strategy derived from analysis of the site and its surroundings. The Proposed Development would aim to attain the highest building standards and will be an opportunity to create a first class, best-practice project.

It will bring a number of benefits, including:

- The provision of the highest standard of design that respects local context and character;
- The removal of all non-original elements of the external fabric, such as the modern extension (roof and skylights) to the rear of the property, which detract considerably from its heritage value;
- The retention and refurbishment of existing historic fabric and materials, wherever possible;
- The sensitive and careful integration of new material or fabric where the existing fabric cannot be repaired, ensuring that any new material is traditional and in keeping with the order of the existing Building;
- The implementation of the latest low-energy techniques and materials to minimise the effect of carbon emissions on the environment, promoting energy efficiency in design and construction, as well as in the occupation of the development;
- The promotion of the growth of Camden's residential population, accompanied by the development of considerable on-site amenities that will ensure a good quality of life for its residents;
- The addressing of Camden's demand for housing and in doing so reflecting Camden's prioritised land use for residential development;
- The careful consideration of and broad accordance with all relevant national and local policies on the historic built environment.

CONCLUSIONS

6.2 Conclusion

6.2.1 Conclusion

This Design and Access Statement, pertaining to the use conversion and refurbishment of 33 John Street – with the aim of reinstating the Building’s original use as a single-occupancy home or single-family dwelling – has been compiled following a thorough investigation into the history of the Building, Site and surrounding context. It has surveyed the development history of the area as well as the planning history of the Building, and has summarised similar applications across developments in the vicinity, analysing the Proposed Development in the context of all relevant local, regional and national planning policy. It has detailed the Proposed Development in full, outlining proposed layouts, materiality, servicing and access, and provided a considered justification for the change of use of the property.

As outlined in the preceding pages, the objective of the proposal is to revert the Building to its former residential use, enhancing the significance of the listed Building by reinstating its original use, repairing historic fabric and removing insensitive modern additions that have had a detrimental impact upon that heritage. It seeks to create a modern and efficient residential space through the employment of a careful and sensitive approach without negatively impacting the amenity or character of the surrounding area.

The proposals seek to repair the historic fabric of the house, keeping it largely as it is today, but with some localised modifications in order to ensure its practicalability as a modern family home. All interventions are minor, with the possible exception of the removal of the modern extension at the lower ground and ground floor level, which is understood to be an intervention that is wholly beneficial to the histroic use and fabric. No interventions have any effect on the identified significance of the Grade II-listed building, as outlined in the Heritage Assessment undertaken by Giles Quarme Architects.

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