

PD15064/PJB/JH/OF

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10 May 2024

Camden Council
Planning – Development Control
Camden Town Hall
London
WC1H 8ND

Dear Sir/Madam,

**13-15 JOHN'S MEWS, LONDON, WC1N 2PA
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) - FULL PLANNING PERMISSION**

We write on behalf of the applicant, Highgate Luxury Properties Limited (“the Applicant”), to submit an application (“Application”) for full planning permission to the London Borough of Camden (“LBC”) for external alterations including mansard roof extensions and alterations to front and rear fenestration (“the Proposed Development” / “the Proposals”) at 13-15 John’s Mews, London, WC1N 2PA (“the Site”).

The description of development is as follows:

“Erection of mansard roof extensions incorporating front and rear dormer windows at 13 - 15 John Mews. Front and rear fenestration alterations”

This submission is accompanied by:

1. Completed Application Form prepared by Montagu Evans;
2. Completed Community Infrastructure Levy Form prepared by Montagu Evans;
3. Covering Letter (including Planning Statement which is this document), prepared by Montagu Evans;
4. Site Location Plan, prepared by Studio Three Architects;
5. Application Drawings (Existing, Demolition and Proposed Floorplans, Roof Plans, Elevations and Sections), prepared by Studio Three Architects;
6. Design and Access Statement, prepared by Studio Three Architects;
7. Heritage Statement, prepared by the Architectural History Practice (AHP);
8. Daylight and Sunlight Report, prepared by T16 Design; and
9. Energy Statement prepared by Eight Versa.

PLANNING STATEMENT

Site and Surroundings

The Site is located at 13-15 John's Mews and is within the Bloomsbury area of the LBC, which is a mixed-use area, which has undergone much change over time. John's Mews itself is a mews to the rear of John Street, where many properties have been converted to residential uses.

The Site comprises two interlinked properties (nos. 13 and 15), which comprise two storeys, arranged over ground and first floor levels. Both properties are traditional mews buildings with rendered front facades. The mews were originally constructed in the 1800s to serve the houses on John Street. However, the existing buildings were built post-war as much of the area was severely damaged during the Second World War.

The existing building occupies the entirety of the plot, which is rectangular in nature. The building directly fronts the street (John's Mews) and is mid-terrace, therefore being flanked on both sides by other mews buildings.

The building previously provided a workshop at ground floor level with garage space to park two cars. In recent years, there have been numerous applications for the conversion and alteration of the building to residential use.

Most recently, the conversion of the property to 2 x 1 bedroom residential dwellings, arranged over two floors, was consented via permitted development rights in March 2024. Works have been implemented pursuant to this scheme.

The existing building is not listed, but it is located within the Bloomsbury Conservation Area and both buildings are identified in the Appraisal and Strategy document as a positive contributor within the Great James Street / Bedford Row sub-area.

Site Designations

- Central Activities Zone (CAZ);
- Bloomsbury Conservation Area; and
- Protected Viewing Corridor 6A.1 – Blackheath Point to St Paul's Cathedral.

The Site is located within Flood Zone 1 (low probability of flooding) and has a Public Transport Accessibility Level (PTAL) of 6a, which is 'excellent'.

Relevant Planning History

2024/0042/P – Change of use from commercial (use Class E) to residential (Use Class C3) to create 2 self-contained dwellings.

On 22 December 2023, the Applicant submitted an application for prior approval (under ref no. 2024/0042/P) for the change of use from commercial (use Class E) to residential (Use Class C3) to create 2 self-contained dwellings under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

The prior approval application was received by LBC on the 22 December 2023. No decision was made by the LBC within 56 days and as such prior approval was not required. This scheme has since been implemented.

Full planning history for the Site, including reference to previous applications, is outlined within the Design and Access Statement.

Planning Policy Framework

This application has been informed by adopted Development Plan policies and other relevant guidance. This section provides a summary of the planning context from which such policy is drawn.

The Statutory Development Plan

Section 38(5) of the Planning and Compulsory Purchase Act (2004) (as amended) requires planning applications to be determined in accordance with policies of the Development Plan unless material consideration indicate otherwise.

The Development Plan for this Site and the LBC is outlined below:

- London Borough of Camden Local Plan (Adopted July 2017);
- The London Borough of Camden Policies Map (Adopted 2019); and
- London Plan 2021 (Adopted March 2021).

National Planning Policy Framework

The National Planning Policy Framework (the “NPPF”) was originally published in March 2012, and revised in 2018, 2019 and 2021 with the latest revision published December 2023 by the Ministry of Housing, Communities and Local Government. 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. The NPPF is a material consideration in the determination of applications.

Regional Planning Policy

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.

Local Planning Policy

The Camden Local Plan (July 2017) outlines the policies and guidance for development within the LBC until 2031, identifying where the main developments will take place, how places within the Borough will change or be protected from change. LBC has adopted supplementary planning documents which are material considerations in respect of this Application, and those of relevance are:

- Amenity CPG (Adopted January 2021);
- Design CPG (Adopted January 2021);
- Housing CPG (Adopted January 2021); and
- Home Improvements CPG (Adopted January 2021).

The Local Development Scheme (December 2023) sets out the timetable for the New Draft Local Plan for the LBC. Initial consultation on Local Plan issues and further call for sites was undertaken in Winter 2022 / 2023.

Preparation of Draft Local Plan and updated Site Allocations was undertaken in Autumn / Winter 2023. Consultation on the Draft Local Plan and updated Site Allocations commenced in January 2024, with adoption of the Local Plan expected in Summer 2026. Due to the preliminary stages of the Draft Local Plan, we are of the view it currently holds limited, if any, weight in the determination of a planning application by the LBC.

The Proposed Development

The Proposals seek to extend and alter the properties, introducing mansard roof extensions including front and rear dormers and altering the fenestration to create new windows and independent access. Internal reconfiguration of the units are proposed to create two terraced properties, one within no. 13 and the other within no. 15.

Externally, the properties would be re-rendered, and the facades painted. At ground floor, timber panelled doors and timber sash windows are proposed. The existing first floor front windows are to be removed and replaced with high quality timber sash windows with paint finish. Juliette balconies with glazed casement timber doors and black metal railings are proposed at first floor level to the front of the Site.

To the rear, the ground floor windows are to be removed. At first floor level, the windows are to be removed and replaced with glazed timber casement doors, with glazed side panels and Juliette balconies including black painted metal railings.

The mansard roof extensions would be finished in natural slate and would be of a similar height to the mansard extensions situated on the adjoining properties at 11 and 17 John Mews. 2no. traditionally detailed front dormer windows with timber fascias, lead cheeks and timber sash windows are proposed. To the rear, the proposals incorporate 1no. dormer to each dwelling.

1no. rooflight is proposed on each property.

Green roofing and PV Panels are proposed at roof level on each property.

The Proposed Development would result in an uplift of 54 sqm. The existing 1-bed units would be increased to provide 3-bed family units of 133sqm and 137sqm GIA respectively.

Planning Policy Assessment

Principle of Development

Chapter 5 of the NPPF seeks to deliver a sufficient supply of homes by significantly boosting the supply of dwellings.

Policy GG4 (Delivering the homes that Londoners need) of the London Plan emphasises the importance of creating a housing market that works better for all Londoners by creating mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs.

London Plan Policy D3 (Optimising site capacity through the design-led approach) seeks to ensure that all development must make the best use of land by following a design-led approach that optimises the capacity of sites.

Policy H7 (Large and small homes) of the LBC Local Plan seeks to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. The supporting text indicates that 3-bedroom family homes are a priority dwelling type within the borough.

Policy D1 (Design) of the LBC Local Plan requires all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments.

Assessment

In March 2024, prior approval was deemed as granted (under ref no. 2024/0042/P), which enabled the conversion of the building to two residential dwellings under permitted development rights. This consent has since been implemented. Therefore at present, the Site contains 2 x self-contained, 1-bedroom dwellings.

The Proposed Development seeks to extend the properties and would facilitate the enlargement of 13 and 15 John Mews to 3-bedroom dwellings. In line with Policy D3 of the London Plan and Policy D1 of the LBC Local Plan, the Proposals would introduce high quality extensions at the Site, following a design-led approach. As indicated above 3-bedroom family sized dwellings are considered a priority dwelling type within LBC and therefore the Proposed Development would align with the aspirations of Policy H7 of the LBC Local Plan and Policy GG4 of the London Plan.

Design & Heritage Considerations

Good design is essential to creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations. The NPPF establishes that planning should always seek to secure high quality design and that good design is indivisible from good planning.

The legislation governing listed buildings and conservation areas is the Planning (Listed Building and Conservation Areas) Act 1990. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay “*special attention...to the desirability of preserving or enhancing the character or appearance of that area*”. For the avoidance of doubt, the Courts have held preservation to mean the avoidance of harm.

Policy D1 (London’s form, Character, and Capacity form growth) of the London Plan requires developments to respond to local context by delivering buildings and spaces that are positioned and are of a scale, appearance and shape that responds successfully to the identity and character of the locality.

Policy D3 (Optimising site capacity through the design-led approach) of the London Plan seeks to ensure that all development makes the best use of land, optimising the capacity of sites, requiring consideration of design options. Development should positively respond to local distinctiveness and character, whilst providing safe, secure, and inclusive environments. Optimisation is established typically through options (and the site has been subject of many).

Policy D4 (Delivering good design) of the London Plan emphasises the importance of maintaining design quality of development proposals through to completion and where appropriate for proposals to be subject to design scrutiny.

Policy HC1 (Heritage conservation and growth) of the London Plan outlines that development proposals affecting heritage assets and their settings, should conserve their significance by being sympathetic to the assets’ significance and appreciation within the site context.

Chapter 7 of the LBC Local Plan outlines the Council’s approach to design and requires all developments, including alterations and extensions to existing buildings, to be of the highest standard.

Policy D1 (Design) of the LBC Local Plan indicates that good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings.

Policy D2 (Heritage) of the LBC Local Plan seeks to preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets, including conservation areas. The policy notes that, in order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

Assessment

The Site contains two, unlisted mid-terraced properties which reside on the east side of Johns Mews. The Site is within the Bloomsbury Conservation Area and the dwellings have been identified in the Bloomsbury Conservation Area Appraisal as making a positive contribution to the conservation area.

Bloomsbury Conservation Area was designated in 1968 and was sought to protect elements of development from the Georgian and earlier eras but excluded areas where there had been significant later redevelopment. There have been numerous extensions to the conservation area that have mostly reflected a growing appreciation of Victorian and Edwardian and high-quality 20th century architecture.

Following a review of the surrounding context, numerous properties in the general locality of the Site benefit from mansard roof extensions which incorporate front and rear dormers, including the adjoining units at 11 and 17 Johns Mews. Noting the surrounding development on John Mews, the Proposed Development would respect the local character and context in line with Part A of Policy D1 of the LBC Local Plan and Policies D1 and D3 of the London Plan.

The massing and scale of the mansard extensions would be appropriate in the site context and the resultant roof ridge heights would be similar to the adjoining properties at 11 and 17 John Mews, ensuring a degree of consistency in the terrace. The front and rear dormer extensions would be subordinate features within the front and rear roof slopes and would respect the proportions of the host property, in line with Policy D1 of the LBC Local Plan. The extensions have been sensitively designed and sympathetic to the host dwellings, thereby enhancing the character and appearance of the Site and wider Bloomsbury Conservation Area, in line with Policy HC1 of the London Plan and Policy D2 of the Local Plan.

The Proposed Development seeks to refurbish and enhance the respective properties through the introduction of timber sash windows, high-quality materials and the re-rendering and painting of the dwellings, in line with Part A and E of Policy D1, Policy D2 of the LBC Local Plan and Policies D1, D3 and HC1 of the London Plan.

The Proposed Development would incorporate amenity space at ground floor level in the form of a courtyard garden for each respective property. At present, the residential accommodation does not benefit from any external amenity space and as such, in line with Part L of Policy D1 of the LBC Local Plan the proposal incorporates outdoor amenity space.

In line with the above assessment, the Proposed Development would introduce high-quality extensions which would assimilate effectively within the Site context, whilst also incorporating improvements to positively benefit the character and appearance of the host properties, street scene and wider locality, in line with policy aspirations. In accordance with the statutory duties outlined in The Planning (Listed Buildings and Conservation Areas) Act 1990, we conclude that the character and appearance of the Bloomsbury Conservation Area would at least be preserved, by the proposals.

We consider that the proposals comply with relevant policies of the NPPF, the London Plan and the Camden Local Plan. On that basis, the decision maker will be able to discharge their legal duty under Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Full assessment in terms of design and heritage is provided within the Heritage Statement prepared by AHP.

Neighbour Amenity

Section 12 of the NPPF seeks to create a high standard of amenity for existing and future users.

Policy D3 (Optimising site capacity through the design-led approach) of the London Plan seeks to deliver appropriate outlook, privacy, and amenity.

Policy D6 (Housing quality and standards) of the London Plan seeks to ensure that development is of a high quality, providing adequately sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners.

Policy D13 (Agent of Change) of the London Plan emphasises the importance of development being designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them and that good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area.

Policy A1 (Managing the Impact of Development) of the LBC Local Plan outlines that LBC will seek to protect the quality of life of occupiers and neighbours and will not grant planning permission if it is considered to cause unacceptable harm to amenity.

Policy A4 (Noise and Vibration) of the LBC Local Plan states:

“Development should have regard to Camden’s Noise and Vibration Thresholds (Appendix 3). We will not grant planning permission for:

- a) *development likely to generate unacceptable noise and vibration impacts; or*

- b) *development sensitive to noise in locations which experience high levels of noise unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.”*

Assessment

To the north, the Site adjoins 11 John Mews. To the east, the Site abuts the rear boundaries of several terraced properties on John Street. To the south, the Site adjoins 17 John Mews and to the west, the properties face the Saint George the Martyr C of E Primary School

Sunlight, Daylight, Overshadowing & Overbearing

In support of this application, a daylight and sunlight report has been prepared by T16 Design. The report concludes that the proposal is in accordance with BRE Guidance in relation to daylight and sunlight, and therefore would have an acceptable impact on the amenity of surrounding occupiers.

In terms of overbearing, noting the scale of the roof extensions, and that the extensions would be contained within the building envelope, it is not considered that the Proposed Development would result in an unacceptable level of overbearing to neighbouring occupiers.

Privacy

The Proposed Development introduces additional fenestration at roof level in the form of front and rear dormer windows within the mansard extensions. Whilst additional fenestration at roof level may result in the potential for overlooking, noting the general expectations around overlooking in urban areas it is not considered that the proposals would adversely impact neighbouring properties in terms of loss of privacy.

With regards to the alterations to the fenestration at ground and first floor level, given these would be positioned in a similar place to the existing it is not expected that the Proposed Development would result in an unacceptable loss of privacy, significantly over and above the existing arrangement.

Noise

Noting the minor scale of the development it is not considered that the Proposals would adversely affect neighbouring occupiers during the construction phase. There is no change of use proposed, nor the introduction of any plant, which means that neighbouring receptors are unlikely to be affected by operational noise resulting from the development.

Future Occupiers

The Proposed Development seeks to reconfigure the layout of the properties, creating larger residential units. The units would be space standard compliant and dual aspect, providing good levels of daylight and sunlight to habitable rooms. Amenity space is proposed at ground floor level for the benefit of future occupiers of the Site.

In line with the above assessment, the Proposals would have an acceptable impact on the amenity of neighbouring occupiers, whilst also enhancing the quality of accommodation for future occupiers.

Environment, Energy & Sustainability

Energy and Sustainability

Policy SI 2 (Minimising greenhouse gas emissions) of the London Plan encourages carbon reductions across the Borough through energy efficiency measures.

Policy G6 (Biodiversity and access to nature) of the London Plan emphasises the importance of the management of impacts on biodiversity and securing biodiversity net gain.

Policy CC1 (Climate Change Mitigation) of the LBC Local Plan 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 occupation. Part D of **Policy CC1** supports and encourages sensitive energy efficient improvements to existing buildings.

Policy CC2 (Adapting to climate change) of the LBC Local Plan requires development to be resilient to climate change., by incorporating green roofs where appropriate.

The policy and the supporting supplementary planning guidance promotes zero carbon development and requires all development to reduce carbon dioxide through following the steps in the energy hierarchy; and expects all developments to optimise resource efficiency.

In support of this application an energy statement has been prepared by Eight Versa. The statement indicates the Proposed Development results in a 19% reduction in CO2 emissions through energy efficiency measures including PV panels at roof level, in line with Policy SI 2 of the London Plan and Policy CC1 of the LBC Local Plan.

Green roofing is proposed at roof level, totalling 19sqm which would serve to enhance biodiversity at the Site, in line with Policy G6 of the London Plan and Policy CC2 of the LBC Local Plan.

Application Fee

The application fee of £579.00 (inclusive of the planning portal service charge of £70) has been paid directly via the Planning Portal. The fee has been calculated in accordance with The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (as amended).

We would be grateful if LBC could confirm that our application is complete, and we look forward to receiving conformation of validation shortly. If you have any outstanding queries on this matter, please contact James Huish (james.huish@montaguevans.co.uk / 0207 312 7484), or Olivia Fuller (olivia.fuller@montagu-evans.co.uk / 07780493924).

Yours sincerely,

MONTAGU EVANS LLP

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