



# **JMS PLANNING & DEVELOPMENT**

## PLANNING STATEMENT

INTERNAL RECONFIGURATION TO  
CREATE SEVEN RESIDENTIAL UNITS  
(USE CLASS C3),  
FENESTRATION ALTERATIONS,  
LANDSCAPING AND ASSOCIATED  
WORKS

64-66 ARGYLE STREET  
LONDON  
WC1H 8ER



Client: Megaro Hotels Limited  
Project: 64-66 Argyle Street, London WC1H 8ER  
Date: August 2024

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## **SECTION 1: INTRODUCTION**

- 1.1 This Planning Statement has been prepared by JMS Planning on behalf of Megaro Hotels Limited in support of a full planning application and application for Listed Building Consent for internal reconfiguration to create seven residential units (use class C3) (net gain of one unit), fenestration alterations, landscaping and other associated works at 64-66 Argyle Street, London, WCIH 8ER (*'the site'*).
- 1.2 It is considered that the applications are of considerable benefit to LB Camden, namely;
- The applications will provide benefits to the special architectural character of the listed building;
  - The applications will provide enhanced residential units (including a net gain of one unit) within Camden; and
  - The applications will bring a tired and altered listed building back into high quality viable use to allow its ongoing conservation.
- 1.3 This supporting Planning Statement provides details of the application proposal, and the site and the surrounding area and provides an overview of relevant planning policy and the benefits of the application scheme.
- 1.4 In addition to this Planning Statement, this application should be considered alongside the following supporting documents:
- Full set of Existing and Proposed Plans prepared by Holloway;
  - Design and Access Statement prepared by Holloway;
  - Heritage Report prepared by The Heritage Practice;
  - Noise Impact Assessment prepared by Venta Acoustics; and
  - Sustainability and Energy Statement prepared by Ensphere Group Limited.
- 1.5 Accordingly, a description of the site and surrounding area provided at Section 2. An overview of the site's planning history is provided at Section 3. Details of the application proposal are set out at Section 4, with an overview of planning policy provided at Section 5. A description of the key planning issues is detailed at Section 6, with the conclusions set out at Section 7.



## **SECTION 2: SITE AND SURROUNDINGS**

- 2.1 The application site comprises 64-66 Argyle Street, London, WC1H 8ER. The site area is approximately 230 sqm.
- 2.2 The site currently comprises two terrace properties, which are five-storey (including basement level). The site was recently used as St Mungo's boarding house/ hostel. The original use of the properties was as six residential units. Following the granting of a Certificate of Lawfulness under LPA Ref: 2021/1349/P dated 8 September 2021 it is confirmed that the lawful use of the site is as six flats.
- 2.3 The site is located within the Bloomsbury Conservation Area adjacent to Argyle Square, and the properties themselves are Grade II listed buildings. For full details of the application site's listing please see the accompanying Heritage Report. The heritage designations on site and in the surrounding area have been considered during the development process.
- 2.4 To north are hotels and the green space of Argyle Square and to the east and west of the site are flats within terraced properties. To the south is Argyle Walk and beyond that are flatted developments.
- 2.5 The site has a Public Transport Accessibility Level (PTAL) of 6b (excellent) which represents a very high level of accessibility. King's Cross St. Pancras mainline and underground station is a five minute walk away from the application site. Near to the railway stations are bus stops with several different routes. Therefore, the site is in a highly sustainable location.
- 2.6 The buildings on site were erected circa 1839-40 and before the site was used as a hotel and hostel, the properties accommodated six residential units. Prior to the subdivision to provide six residential units, the properties were used as houses. Significant internal alterations took place to both buildings in 1984, following the granting of listed building consent (HB/3360). Given the extent of changes/loss, the architectural interest of the interior is secondary to the exterior, which is chiefly embodied in the front elevation.
- 2.7 The site within Flood Zone 1 and is at low risk from surface water flooding.
- 2.8 Photographs of the application site are contained within the accompanying Design and Access Statement prepared by Holloway Architects.



## SECTION 3: PLANNING HISTORY

- 3.1 A review has been undertaken using the London Borough of Camden's online Planning Portal, and the following applications relate to the site itself:

Reference	Description	Decision	Date
2023/5132/P and 2024/0608/L	Creation of additional unit to provide seven units (Class C3) within 64-66 Argyle Street, erection of a mews house to provide a new residential unit, fenestration changes, soft and hard landscaping, new plant equipment	Withdrawn	30/04/24
2022/2676/T	Notification of Intended Works to Tree(s) in a Conservation Area	No Objection to Works to Tree(s) in CA	26/09/22
2021/1349/P	Use of whole property as self-contained residential dwellings (Class C3)	Granted	08/09/21
2010/4297/T	Notification of Intended Works to Tree(s) in a Conservation Area - no objection to works on tree(s)	No Objection to Works to Tree(s) in CA	09/09/20
9592421	Seeking permission to lop part of a Sycamore tree situated in rear garden	Agree to Pruning of Trees	25/10/95
HB/3360	Works of internal alterations and alterations to the rear elevation including the installation of new doors at basement and ground floor levels, new metal stairs, and a reduction in the height of the rear extension at no.64. (as shown in drawing	LBC Consented	22/03/84

Reference	Description	Decision	Date
	nos.8233/X1-X3,X5,P1-P5 & P7).		
35758	Continued use as a hostel	Granted with Conditions	04/07/83, personal to St Mungos
24670	Continued use as a staff hostel	Granted	05/08/77
22527	Continued use as a staff hostel	Granted	02/09/76
15116	The continued use for a further limited period of Nos. 64 and 66 Argyle Street, WCl as a staff hostel	Granted	05/02/73
7709	The continued use for a further limited period of Nos. 64 and 66, Argyle Street, Camden, as a staff hostel	Granted	15/10/69
3859	The use, for a further limited period, of Nos. 64/66 Argyle Street, Camden, as a staff hostel	Granted	27/07/67
TP35896/25/05/62	The use for a limited period of 64-66 Argyle Street, St. Pancras, as a staff hostel	Granted	27/07/62
05/07/61	To use premises as a private hotel	Granted	13/07/61
5173	Use of property as a private hotel	Refused Dismissed at Appeal	18/07/60 15/06/61

- 3.2 An application was submitted on 2 December 2023 for a similar proposal as proposed now, however, a mews house was proposed to the rear of the site. Due to heritage related concerns of the mews property provided by the Council, the application was withdrawn on 30 April 2024.
- 3.3 The key decision in the site's planning history, is a Certificate of Lawfulness (LPA Ref: 2021/1349/P) which has confirmed that the lawful use of the whole property is as self-contained, residential dwellings (Class C3) which was granted on 8 September 2021. The relevant officer's report concludes:

*"The Council does not have any evidence to contradict or undermine the applicant's version of events. The information provided by the applicant is deemed to be sufficiently precise and unambiguous to demonstrate that St Mungo's vacated the premises in 2020 and that the lawful use is now for residential Class C3. Their permission in 1983 required the use on their vacation to revert to the lawful use for residential purposes. It is likely that, according to the planning history summarised above, the previous use was as 6 self-contained flats as this is referred to in the planning decision of July 1960 ref 5173.*

*Thus the lawful use of the property is now Class C3 residential."*

- 3.4 As such, following the cessation of the longstanding temporary use of the property as a hostel, the lawful use of the property is considered to be as six self-contained flats.





## SECTION 4: THE PROPOSAL

- 4.1 This Section of the Planning Statement sets out details of the application proposal. This Section should be read alongside the associated Plans and Supporting Documents, particularly the Design and Access Statement and Heritage Statements submitted in support of the application.
- 4.2 The full planning and associated Listed Building Consent applications seek internal reconfiguration to create seven residential units (use class C3) (net gain of one unit), fenestration alterations, landscaping and other associated works. The strategy seeks to retain and make good historic features and plan form where it survives and to deliver an enhancement to the quality of the interior and exterior of the building.
- 4.3 The existing buildings will comprise of seven residential units, with each unit including:
- Bedrooms
  - Bathrooms
  - Kitchens
  - Living/dining areas
- 4.4 The layout of these units is illustrated on the proposed floorplans submitted.
- 4.5 The mix of these units are provided below:

Unit	Mix
1	1b2p
2	1b2p
3	1b1p
4	1b1p
5	2b4p
6	2b3p
7	2b3p

- 4.6 As the site has a PTAL rating of 6b, and Policy T6.1 of the London Plan encourages developments to be car-free developments. Accordingly, the proposed development is to be car free.
- 4.7 Within 64-66 Argyle Street, recycling bins and waste storage will be provided internally in each kitchen, and bags will be placed at street level on collection day, as observed along Argyle Street.
- 4.8 The proposed development has been designed with consideration of the listing and the Conservation Area, to ensure that the changes are sympathetic to the existing and in keeping with the historic character of the area. A full assessment of the works is set out within the associated Design and Access Statement



prepared by Hollaway, the Heritage Appraisal by the Heritage Practice and the associated drawings.

- 4.9 Overall, it is considered that the refurbishment and modernisation proposed will bring back the building to a high-quality standard, providing adequate accommodation on site, which will consequently fund its ongoing maintenance and by extension long-term conservation.



## **SECTION 5: PLANNING POLICY**

- 5.1 This Section of the Planning Statement sets out relevant national and local planning policy relevant to the proposed development.

### **National Planning Guidance**

- 5.2 The revised National Planning Policy Framework (NPPF) was updated in December 2023 and constitutes guidance for local planning authorities and decision takers and is a material consideration in the determination of planning applications.
- 5.3 The purpose of the planning system is to contribute to the achievement of sustainable development development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner (paragraph 7).
- 5.4 Paragraph 8 confirms that there are three overarching objectives to sustainable development: economic, social, and environmental, which are interdependent and need to be pursued in mutually supportive ways.
- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - A social objective – to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing; and
  - An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making efficient use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 5.5 These objectives should be delivered through the preparation and implementation of plans and application of policies in the framework; they are not criteria against which every decision can or should be judged. It is confirmed that the planning system should play an active role in guiding development to



sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9).

- 5.6 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10). For decision takers this means, inter alia, approving development proposals that accord with the development plan without delay.
- 5.7 Local Planning Authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible (paragraph 38).
- 5.8 Chapter 5 of the NPPF deals with delivering a sufficient supply of homes. Paragraph 60 confirms that to support the Government's objectives of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land is developed without unnecessary delay. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.
- 5.9 Paragraph 61 of the NPPF confirms that to determine the minimum number of homes needed strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 5.10 Strategic policy making authorities should establish a housing requirement figure for the whole area, which shows the extent to which their identified housing need can be met in the plan period (paragraph 67).
- 5.11 Planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and economic viability. Planning policies should identify specific deliverable sites for five years following the intended date of adoption and broad plans for 6-15 years of the plan (paragraph 69).
- 5.12 Small and medium sized sites can make an important contribution to meeting the housing requirements of an area, and often are built out relatively quickly.

To promote the development of a good mix of sites Local Planning Authorities should support the development of windfall sites through their policies and decisions, giving great weight to the benefits of using suitable sites within existing settlements for homes (paragraph 70).

- 5.13 Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed or brownfield land (paragraph 123).
- 5.14 Paragraph 124 confirms that planning policies and decisions should promote and support the development of underutilised land and buildings, especially if this would help meet an identified need for housing where land supply is constrained, and available sites could be used more efficiently.
- 5.15 This is further confirmed in paragraph 128 which advises that planning policies and decisions should support development that makes efficient use of land taking into account the identified need for different types of housing and other forms of development and the availability of land suitable for accommodating it; local market conditions and viability; the availability and capacity of infrastructure and services; the desirability of maintaining an area's prevailing character and setting or are promoting regeneration and change; and the importance of securing well-designed and beautiful, attractive and healthy places.
- 5.16 Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimum use of the potential of each site (paragraph 129).
- 5.17 Planning policies and decisions should ensure that developments:
  - (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<sup>49</sup>; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. (paragraph 135).

### **The Development Plan**

- 5.18 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that all applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.19 For the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004 the statutory development plan comprises The London Plan (2021) and the Camden Local Plan (adopted 3 July 2017).
- 5.20 Each of the documents relevant to the application site is considered in turn below.

#### The London Plan 2021

- 5.21 Policy GGI (Building Strong and Inclusive Communities) recognises that planning and development must encourage early and inclusive engagement with stakeholders, positively contribute to the physical environment, create welcoming spaces, ensure that new buildings are designed to reinforce or enhance the identity of neighbourhoods, and promote the creation of an inclusive London.
- 5.22 Policy GG2 (Making the Best Use of Land) encourages making the best use of land by creating high-density, mixed-use places by prioritising development of Opportunity Areas, brownfield land, sites within and on the edge of town centres, and small sites and sites which are well-connected by public transport, walking and cycling, applying a design-led approach.
- 5.23 Policy D1 (London's Form, Character and Capacity for Growth) provides a policy framework for delivering growth, optimising site capacity through the design-led approach set out in Policy D3.
- 5.24 Policy D3 (Optimising Site Capacity Through the Design-led Approach) sets out the requirements to optimise site capacity based on a design-based approach which responds to a site's context and capacity for growth. It goes on to say that development proposals should have:



## **Form and Layout**

- 1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions;
- 2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area;
- 3) be street-based with clearly defined public and private environments;
- 4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users.

## **Experience**

- 1) achieve safe, secure and inclusive environments;
- 2) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest;
- 3) deliver appropriate outlook, privacy and amenity;
- 4) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity;
- 5) help prevent or mitigate the impacts of noise and poor air quality;
- 6) achieve indoor and outdoor environments that are comfortable and inviting for people to use.

## **Quality and Character**

- 1) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character;
- 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well;
- 3) aim for high sustainability standards (with reference to the policies within London Plan Chapter's 8 and 9) and take into account the principles of the circular economy;



- 4) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

5.25 Policy D4 (Delivering Good Design) seeks to ensure good design from developing to completion stages. It confirms that proposals will be scrutinised based on the requirements set out in part B of Policy D3. Policy goes on to state that the design quality of development should be retained through to completion by:

- 1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development;
- 2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design;
- 3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter;
- 4) local planning authorities considering conditioning the on-going involvement of the original design team to monitor the design quality of a development through to completion.

5.26 Policy D5 (Inclusive Design) confirms that to deliver an inclusive environment, development proposals are required to achieve the highest standards of accessible and inclusive design ensuring they can be entered and used safely; are convenient and welcoming with no disabling barriers; and are designed to incorporate safe and dignified emergency evacuation for all building users. It goes on to say that in developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building.

5.27 Policy D6 (Housing Quality and Standards) supports a range of housing typologies to optimise the development of housing on sites across London. It confirms that new homes should have adequately sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of occupants over their lifetimes taking into account the needs of children, disabled and older people.

5.28 Policy D7 (Accessible Housing) requires at least 10% of new dwellings to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users (Building Regulations M4(3)), and all other new build dwellings to be 'accessible and adaptable dwellings' (Building Regulations M4(2)).



- 5.29 Policy D8 (Public Realm) sets out the requirements for development proposal in regard to public realm to ensure it is safe, accessible, inclusive, attractive and well-connected, easy to understand and maintain; it relates to the local and historic context, and provides natural surveillance; incorporates good quality design, landscaping, planting, street furniture and surfaces. Any on-street parking should not be dominant or continuous so that there is space for green infrastructure as well as cycle parking in the carriageway.
- 5.30 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 inter alia, separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening or internal layout. Where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles. It goes on to say that proposals should improve and enhance the acoustic environment and promote appropriate soundscapes.
- 5.31 Policy H1 (Increasing Housing Supply) sets out the 10-year target for net housing completions which Local Planning Authority should plan for and include within their Development Plan documents. The 10 year target for the period 2019/2020-2028/2029 has increased since that of the previous plan period to 522,870 (an increase of approximately 98,983). These housing figures are based on the 2017 London SHLAA, which suggests there is capacity across London for approximately 40,000 new homes a year on large sites with an additional potential capacity on smaller sites for 12,000 new homes a year.
- 5.32 Policy H10 (Housing Size Mix) states that to determine the appropriate mix of units sizes in relation to the number of bedrooms for a scheme, both applicants and decision-makers should have regard to the range of housing need and demand identified by the 2017 London SHMA; the requirement to deliver mixed and inclusive neighbourhoods; the mix of uses in the scheme, the range of tenures in the scheme; the nature and location of the site, with higher proportions of one and two bedrooms more appropriate in locations close to town centres, stations or with higher public transport access and connectivity; the aim to optimise housing potential on sites; the ability of new development to reduce pressure on conversions, sub-division and amalgamation of existing stock and the role of one and two bed units in freeing up family housing. Policy T4 (Assessing and Mitigating Transport Impacts) requires all development proposals to reflect and be integrated with current and planned transport access, capacity and connectivity and where appropriate mitigate any adverse transport impacts of the proposal.



- 5.33 Policy SI 2 (Minimising Greenhouse Gas Emissions) requires a minimum on-site reduction of at least 10 per cent beyond Building Regulations for residential development.
- 5.34 Policy SI 13 (Sustainable Drainage) confirms that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible, with a preference for green over grey features in line with the drainage hierarchy set out in the Policy. In addition, policy requires development to avoid impermeable surfacing, and be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.
- 5.35 Policy T1 (Strategic Approach to Transport) seeks to support and facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. In addition, it states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 5.36 Policy T4 (Assessing and Mitigating Transport Impacts) requires all development proposals to reflect and be integrated with current and planned transport access, capacity and connectivity and where appropriate mitigate any adverse transport impacts of the proposal.
- 5.37 Policy T5 (Cycling) confirms that development plans and proposals should remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through inter alia, securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking in accordance with LP minimum standards which require one space per studio or 1p1b dwelling, 1.5 spaces per 2p1b dwelling, and two spaces per all other dwellings (long stay) and 2 spaces for 5 to 40 dwellings and 1 space per 40 dwellings thereafter (short stay). Policy requires a minimum two short stay and two long stay cycle parking spaces for every development, albeit it does not apply to residential developments of fewer than 5 dwellings.
- 5.38 Policy T6 (Car Parking) confirms that car-free development should be the starting point for all development proposals that are well-connected by public transport. Policy goes on to say that where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles.

- 5.39 Policy T6.1 (Residential Parking) states disabled residential car parking is required to be provided for new residential developments delivering 10 or more units and requires as a minimum that 3% of dwellings should have at least one designated disabled bay from the outset. It goes on to say that as part of a Parking Design and Management Plan, an additional 7% of dwellings could be provided with disabled parking spaces in the future if demand dictates. In addition, it requires at least 20% of spaces to have active charging facilities, with passive provision for all remaining spaces.
- 5.40 Policy SD6 (Town Centres and High Streets) states that the vitality and viability of London's varied town centres should be promoted and enhanced by enhancing and promoting tourist infrastructure, including hotels, in town centre locations, especially in outer London.
- 5.41 Chapter 7 '*Heritage and Culture*' defines '*Heritage significance*' (para 7.1.7) as '*the archaeological, architectural, artistic or historic interest of a heritage asset. This may can be represented in many ways, in an asset's visual attributes, such as - form, scale, materials, and architectural detail, design and setting, as well as through historic associations between people and a place, and, where relevant, the historic relationships between heritage assets.*' It goes on to say that '*development that affects heritage assets and their settings should respond positively to the assets' significance, local context and character to protect the contribution that settings make to the assets' significance. In particular, consideration will need to be given to mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form.*'
- 5.42 In terms of development proposals, Policy HCI (Heritage Conservation and Growth) states that '*Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*'

#### The Camden Local Plan (July 2017)

- 5.43 Policy A1 (Managing Impact and Development) confirms that the Council will seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless it causes unacceptable harm to amenity.
- 5.44 Policy A4 (Noise and Vibration) confirms the Council will seek to ensure that noise and vibration is controlled and managed.

- 5.45 Policy D1 (Design) confirms the Council will seek to secure high quality design and development. In particular, the Council will require development that, respects local context and character and preserves or enhances the historic environment and heritage assets in accordance with Policy D2 (Heritage). It requires development to be sustainable in design and construction and to comprise details of materials that are of high quality and complement the local character and integrate well with the surrounding streets and open spaces.
- 5.46 Policy D2 (Heritage) states the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including Conservation Areas and Listed Buildings. The policy confirms the Council will not permit the loss 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.
- 5.47 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 to the proposal convincingly outweigh that harm.
- 5.48 In respect of Conservation Areas, the Council will:
- a. Require that development within Conservation Areas preserves or, where possible, enhances the character or appearance of the area;
  - b. Resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a Conservation Area;
  - c. Resist development outside of a Conservation Area that causes harm to the character or appearance of that Conservation Area; and
  - d. Preserves 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.

### **Supplementary Planning Guidance**

- 5.49 Supplementary Planning Guidance documents which provide detailed planning guidance are relevant including:
- Amenity SPG
  - Design SPG
  - Housing SPG
  - Energy Efficiency and Adaptation SPG
  - Bloomsbury Conservation Area Appraisal and Management Strategy

## SECTION 6: KEY PLANNING ISSUES

- 6.1 Having reviewed the relevant planning policy background and the characteristics of the site and surrounding area and the proposed development, it is considered that the following planning issues are most relevant to the consideration of the application.

1. Principle of Development;
2. Residential Amenity;
3. Noise;
4. Heritage;
5. Secure by Design;
6. Sustainability and Energy;
7. Daylight and Sunlight Matters;
8. Parking;
9. Refuse Storage;
10. Fire Safety; and
11. Biodiversity Net Gain (BNG).

### Principle of Development

- 6.2 The NPPF confirms the purpose of the planning system is to contribute to the achievement of sustainable development.
- 6.3 The principle of residential use is established on the site. A Certificate of Lawfulness (LPA Ref: 2021/1349/P) for *'Use of whole property as self-contained residential dwellings (Class C3)'* was approved on 8 September 2021.
- 6.4 The Certificate sought confirmation that 64-66 Argyle Street had reverted to its lawful use for residential purposes following the vacation of the premises by St Mungo's, as per condition 1 of planning permission 35758, dated 04/07/1983. This permission was for 'continued use as a hostel' and had a condition which made this permission personal to St Mungo Community Housing Association and required that 'on their vacating the premises the use shall revert to the lawful use for residential purposes'. St Mungo's left the premises in late 2020 which is now vacant. Notably the Officer's Report in respect of the recent Certificate of Lawfulness stated:

*"The Council does not have any evidence to contradict or undermine the applicant's version of events. The information provided by the applicant is deemed to be sufficiently precise and unambiguous to demonstrate that St Mungo's vacated the premises in 2020 and that the lawful use is now for residential Class C3. Their permission in 1983 required the use on their vacation to revert to the lawful use for residential purposes. It is likely that, according to the planning history summarised above, the previous use was as 6 self-contained flats as this is referred to in the planning decision of July 1960 ref 5173.*



*Thus the lawful use of the property is now Class C3 residential."*

- 6.5 The application site is also surrounded by residential properties (62 Argyle Street and 33 Argyle Square).
- 6.6 The scheme as proposed will enable the delivery of seven self-contained units within the listed buildings, which will restore its historic nature of the building, which previously provided six self-contained units (planning application reference: 5173) prior to the use of the properties as a hotel and hostel.
- 6.7 In reference to the additional units, the London Borough of Camden Housing Delivery Test -Action Plan dated August 2022 states that between 2018/19 and 2020/21, the Council had a target of 2,891 new homes to be built in Camden. 2202 were delivered. Due to this, Camden had to produce an action plan and apply a 20% buffer to their 5 year housing land supply.
- 6.8 Therefore, this demonstrates that there is a demand to provide more housing within the Borough and if proposals are acceptable in other terms, housing schemes should be permitted.

### **Residential Amenity**

- 6.9 The application proposals have been designed to protect and ensure the amenity of both future occupiers and neighbouring properties.

### Future Occupiers

- 6.10 Nationally Described Space Standards has been considered during the design of the proposals. The table below shows that the requirements are met.

Unit	Mix	Storeys	GIA (sqm)	GIA (sqm) Requirement
1	1b2p	1	50	50
2	1b2p	1	50	50
3	1b1p	1	46.6	39
4	1b1p	1	47.3	39
5	2b4p	1	72	70
6	2b3p	1	71.8	61
7	2b3p	1	73	61

- 6.11 The lower ground floor units will each have their own private amenity space, totalling 94.5 sqm. This includes 27.6 sqm of soft landscaping and 66.9 sqm of hard landscaping. The space will be divided into two sections, with a fence provided to ensure privacy for both units.



6.12 The upper levels do not have private amenity space. However, there are several nearby green spaces, including:

- Argyle Square Gardens – immediately adjacent to the application site
- Bramber Green (Judd Street Open Space) – 0.2 miles
- Regent Square Gardens – 0.2 miles
- St. Georges Gardens – 0.3 miles

#### Neighbouring Residents

6.13 In regard to the proposed residential units within the listed buildings, the residential use has already been established, and therefore the relationship between future occupiers and nearby residents has been deemed acceptable.

#### **Noise**

6.14 As part of the proposed works at the application site, it is proposed that air source heat pumps are installed on the existing building.

6.15 Therefore, a Planning Compliance Noise Impact Assessment Report has been prepared by Venta Acoustics in support of this application submission, to assess the potential noise impact of this proposal.

6.16 An environmental noise survey has been undertaken to determine the background noise levels at the most affected noise sensitive receptors. These levels are used to undertake an assessment of the likely impact with reference to the planning requirements of Camden Council.

6.17 The most affected noise sensitive receivers are expected to be the upper floor flats in the newly converted building at 64-66 Argyle Street.

6.18 On the basis of the measured noise levels and the planning requirements of the Camden Council, and considering that it is not expected that tonal noise will be generated by the proposed plant units, the following plant specific sound levels should not be exceeded at the most affected noise sensitive receivers:

Monitoring Period	Minimum $L_{A90,15min}$
07:00 – 23:00 hours	45 dB
23:00 – 07:00 hours	43 dB

**Table 4.2 – Minimum background and average ambient noise levels**

6.19 It is not envisaged that any additional mitigation measures beyond the sites inherent geometry will be required for external noise emissions.

6.20 The proposed scheme is not expected to have a significant adverse noise impact and the relevant plant noise requirements will be met.





## **Heritage**

- 6.21 A Heritage Appraisal has been prepared by The Heritage Practice in support of this application submission.
- 6.22 The proposed reinstatement of the domestic use of the properties will be a significant enhancement and will be in keeping with the conversion of other buildings along and around Argyle Square. The proposals will include a comprehensive refurbishment of their fabric and services in order to secure their ongoing beneficial use for the medium to long term. The interior of the buildings are currently of low significance and the proposals will secure enhancements to their character wherever possible. Any minor harm caused by the removal of the ground to basement staircase and the replacement of the ground to 1<sup>st</sup> floor flight within no.66 will be outweighed by the extensive enhancements to the plan form, spatial quality and internal character of the listed buildings which will be delivered by this scheme.
- 6.23 The proposals will preserve and enhance the key high significance front façade of the listed buildings, their positive contribution to the street scene along Argyle Street/Square and to the character and appearance of this part of the Bloomsbury Conservation Area. To the rear, the façade will also be refurbished and damaging elements such as the steel flue will be removed.
- 6.24 The proposed works are considered to fully comply with the relevant statutory requirements of the 1990 Act, as well as the provisions of the National Planning Policy Framework 2023, the London Plan 2021 and the relevant policies of the London Borough of Camden's Local Plan 2017. They will preserve, and in many aspects, enhance the special architectural and historic interest of the listed buildings and the character and appearance of this part of the Bloomsbury Conservation Area.

## **Secure by Design**

- 6.25 The Applicant is committed to ensure that the application site complies with the aims of Secure by Design. This is to ensure safety of future occupiers, as well as existing residents nearby.
- 6.26 The rear windows of the property overlook Argyle Walk, providing a level of security. Argyle Walk also benefits from existing lighting.
- 6.27 The Applicant will ensure all locks, doors and windows etc used in the development will meet required Secured by Design Standards.

## **Sustainability and Energy**

- 6.28 A Sustainability and Energy has been prepared by Ensphere in support of this planning application and application for Listed Building Consent.



- 6.29 A range of sustainable design features are proposed, and construction will be responsibly managed to ensure minimal impact on the environment and local community.
- 6.30 Given the nature of the development proposal, the physical alterations are limited. Nevertheless, it is proposed to reduce energy demands in line with the Energy Hierarchy. This will be achieved principally through the upgrading of fabric where possible in the existing building, with consideration also given to heritage context, as well as the installation of more efficient systems, lighting and control measures. Water consumption shall be reduced below 105 litres / person / day.
- 6.31 Energy modelling has been undertaken using Elmhurst software and the carbon savings delivered by each of the three steps of the Energy Hierarchy have been estimated (indicative outputs are included in the appendices). Carbon savings are anticipated to be >35% relative to the baseline.
- 6.32 Overall, the proposals for the scheme are in line with the overarching principles of sustainable development as well as the policy requirements of the National Planning Policy Framework, London Plan and policies of the Council. When implemented, the scheme will provide an efficient and low carbon development.

### **Daylight and Sunlight Matters**

- 6.33 For the recently withdrawn application, an Internal Daylight and Sunlight Report was prepared by Delva Patman Redler in support of the application submission. The report has also been submitted in support of this application.
- 6.34 For the report, all habitable rooms in the development, comprising 26 rooms across eight dwellings, were assessed.
- 6.35 Regarding daylight in the dwellings, of the 26 rooms assessed, 17 (65%) would satisfy a strict application of the BRE daylight guidelines. Of the nine rooms that fall below the guidelines, seven are located at lower ground floor. The remaining two rooms are living/kitchen/dining areas at ground floor which both see a median illuminance of at least 155 lux which could be considered to be high and just shy of the target lux level adopted of 200 lux.
- 6.36 Of the eight dwellings assessed, seven dwellings (88%) would satisfy the sunlight guidelines with at least one habitable room capable of receiving at least 1.5 hours of sunlight on 21 March. The living/dining room to the one unit which falls below of this target sees 1.3 hours of sunlight which is just shy of the recommendations.

- 6.37 Therefore, the report concludes that the layout of the proposed development is generally consistent with the Council's local planning policy on daylight and sunlight. As the revised application does not include a mews property to the rear, this will mean that daylight and sunlight matters will be in a better position than what was concluded for the previous scheme.

### **Parking**

- 6.38 The site has a PTAL rating of 6b. Policy T6.1 of the London Plan encourages developments to be car-free developments. In accordance with the Policy the proposed development is to be car free.
- 6.39 There is no space on site to provide cycle parking on site, however the Applicant is satisfied to provide a financial contribution towards a shared bicycle store along Argyle Square.

### **Refuse Storage**

- 6.40 Within 64-66 Argyle Street recycling bins and waste storage will be provided internally in each kitchen, and bags will be placed at street level on collection day, as observed along Argyle Street.

### **Fire Safety**

- 6.41 A Fire Safety Statement is submitted in support of the application which confirms that the development can be brought forwards in a manner which is safe in respect to fire safety matters. The application proposals are thus considered to accord with London Plan Policy D12 (Fire Safety).

### **Biodiversity Net Gain (BNG)**

- 6.42 BNG is now mandatory for all new planning permission applications.
- 6.43 Certain types of development are exempt from the BNG requirement. These exemptions are detailed in paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024.
- 6.44 The de minimis exemption applies if both of the following conditions are met:
- The development must not impact any onsite priority habitat; and
  - If there is an impact on other onsite habitat, it must affect less than 25 square metres of habitat with a biodiversity value greater than zero and less than 5 metres of onsite linear habitat (such as a hedgerow).
- 6.45 Onsite habitat is considered 'impacted' if it is lost or degraded, resulting in a decrease in biodiversity value. In this case, the site does not contain any priority



habitat. Although there is soft landscaping at the rear of the site, it will not be lost or degraded by the development. Additionally, the development includes plans for extra soft landscaping. As such, the proposed development qualifies for the de minimis exemption and does not need to provide a 10% biodiversity net gain.



## SECTION 7: CONCLUSIONS

- 7.1 This Planning Statement has been prepared by JMS Planning on behalf of Megaro Hotels Limited in support of a full planning application and Listed Building Consent for internal reconfiguration to create seven residential units (use class C3) (net gain of one unit), fenestration alterations, landscaping and other associated works at 64-66 Argyle Street, London, WC1H 8ER (*the site*).
- 7.2 This application follows a previous application that sought the “*Creation of additional unit to provide seven units (Class C3) within 64-66 Argyle Street, erection of a mews house to provide a new residential unit, fenestration changes, soft and hard landscaping, new plant equipment*” at the above site with the LPA refs: 2023/5132/P and 2024/0608/L. Due to heritage related concerns of the mews property provided by the Council, the application was withdrawn (30 April 2024).
- 7.3 It is considered that the application is of considerable benefit to LB Camden, namely it:
- The applications will provide historical benefits to the special architectural character of the listed building;
  - The applications will provide enhanced hostel stock within Camden;
  - The applications will help retain local jobs and associated benefits to the local economy; and
  - The applications will bring a tired and altered listed building back into high quality use and will facilitate a viable use to fund its ongoing conservation.
- 7.4 Accordingly, it is respectfully requested that planning permission is forthcoming for this proposal.