

MADDOX PLANNING
**PLANNING
STATEMENT**

Lytton Court
March 2025

Description of development

Construction of a two-storey roof extension for the provision of three additional residential units

Type of application

Full planning permission

Applicant

Audeo Property Ventures Ltd

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1.0 Introduction

- 1.1 This statement has been prepared in support of an application for planning permission for the construction of a two-storey roof extension for the provision of three additional residential units at Lytton Court, Barter Road.
- 1.2 The Council's pre-application advice has been sought prior to the preparation and submission of the application. A collaborative approach has been taken with Camden officers and neighbouring properties have also been given the opportunity to discuss the proposals with the client. The pre-application feedback and public consultation is discussed in section 3.0 of this statement.
- 1.3 The context of this application is the pressing need for new homes in Camden. It is critical to note the significant material consideration that the presumption in favour ('tilted balance') under paragraph 11d of the National Planning Policy Framework (NPPF) (February 2025) applies by reason that the borough has failed to deliver the number of homes that are required under the government's Housing Delivery Test (HDT). The latest HDT results confirm that the borough delivered 53% against its housing target meaning the 'presumption in favour' applies. This means that permission should only be refused if the adverse impact of approving the development would significantly and demonstrably outweigh the benefits. The fact that the Council's housing target has also now significantly increased is also an important material consideration.
- 1.4 This statement assesses the merits of the proposed development in the context of national, regional and local planning policy objectives and other material planning considerations, including the Council's pre-application feedback. As set out in this statement, the proposed development meets the strategic aims of national policy and complies with the local Development Plan. However, if the planning balance is weighed at any stage, the balance is significantly in favour of permitting the development.
- 1.5 As set out in this statement, the proposed development complies with the relevant policies in the Development Plan and planning permission can, therefore, reasonably be granted.
- 1.6 The development will deliver the following public benefits:
 - The redevelopment of an underutilised brownfield site to provide new homes. Paragraph 125 of the NPPF gives substantial weight to the value of using suitable brownfield land within settlements to provide new homes;
 - The provision of 3 homes for the Council's housing stock. This should be given substantial weight given the acute housing shortage in the borough;
 - The ongoing economic benefit of 3 net additional households (Council Tax payments, net spend of residents into the local economy etc.);
 - Enhancement of the existing building's design, hierarchy and proportions through resolving the current unsatisfactory weak termination and the poor quality, meanly proportioned third-floor to balance more effectively with the proposed extension. This enhancement would benefit the wider Conservation Area, providing a better-quality corner building that relates well to the surrounding townscape;
 - Improved sustainability and biodiversity through the provision of internal Air Source Heat Pumps and a green roof;
 - The provision of an affordable housing payment;
 - Improvement of the overall fire safety of the building through introducing new fire safety measures;
 - Improvements to local infrastructure through a Community Infrastructure Levy (CIL) contribution; and
 - Creation of construction jobs throughout the construction of the development.
- 1.7 This statement is structured as follows:

- Section 2.0 describes the site and the surrounding context and identifies the relevant planning designations;
- Section 3.0 provides the site's relevant planning history, pre-application advice and public consultation;
- Section 4.0 provides the planning policy framework;
- Section 5.0 identifies the relevant planning policies and assesses the proposals against these policies and other material considerations; and
- Section 6.0 draws our conclusions in respect of the proposals.

2.0 Site and surroundings

- 2.1 The site features a 1990s four storey, plus basement block of residential accommodation (Class C3). The building contains 11 residential units, with the basement storey housing services and storage facilities.
- 2.2 The site is adjoined to a terrace of Grade II listed buildings (16-20A Barter Street) to the east and to the south is a six-storey office building, Hogarth House. Grade II listed 21 Barter Street is also located in the vicinity, opposite 16-20A Barter Street.
- 2.3 The existing building is a modern take on the neighbouring mid-19th century buildings, replicating some of the architectural elements present on those buildings. The site is not statutorily or locally listed but is located within the Bloomsbury Conservation Area.
- 2.4 The site is located within sub area 6: Bloomsbury Square/Russell Square/Tavistock Square, as set out in the Bloomsbury Conservation Area Appraisal and Management Strategy, where the council have not identified the site as being either a positive or negative contributor to the conservation area. The building is not discussed in the Bloomsbury Conservation Area Appraisal, however the appraisal includes a section on Barter Street, stating that *“views to the south-west are dominated by the twelve-storey, concrete clad Holborn Tower situated at No 137 High Holborn which was completed in 1960: it dominates long views and is out of keeping with the grain and scale of the sub area,”* see image below.
- 2.5 The site is located in the Central London Area and has a PTAL Rating of 6b, indicating that the site has very good access to public transport links.
- 2.6 The site is located in an Archaeological Priority Area and is located in Flood Zone 1 (lowest probability of flooding).



Above: Image of the site from Barter Street

3.0 Planning history

3.1 The below table sets out the relevant planning history for Lytton Court, Barter Street.

Reference	Description	Status/date
9000368 133-136 High Holborn 1-3 Bloomsbury Court and 16-20 Barter Street	Amendment of planning permission dated 19th August 1988 (Reg.No. PL/8800104/R2) for redevelopment of site by new residential office and retail block replacing caretaker's accommodation by additional studio flat as shown on drawing number A1/1484/61C.	Approved 07/08/1990
8900364 133-136 High Holborn 1-3 Bloomsbury Court and 14-20 Barter Street	Approval of details of facing materials pursuant to condition 01 of planning permission dated 19th August 1989 (Reg.No.PL/8800104/R1) for the redevelopment of the site.	Approved 02/08/1989
8900102 133-136 High Holborn 1-3 Bloomsbury Court and 14-20 Barter Street	Approval of landscaping details pursuant to condition 3 03 of planning permission dated 19th August 1988 (Reg. No.PL/8800104/R2) for redevelopment of site by the erection of a part 4 part 6 storey building for use as offices (Class B1 of the TCPUCO87) (Class A2) and ten residential flats with car parking for seven cars and the refurbishment of 16 18 and 20 Barter Street for retail (Class A1) on the basement and ground floors and a total of 3 X 2 bedroom maisonettes on the upper floors (as shown on drawing numbered A1/1484/W002).	Approved 11/01/1989
8800105 133-136 High Holborn 1-3 Bloomsbury Court and 14-20 Barter Street	Redevelopment of 133-136 High Holborn/1-3 Bloomsbury Court and 14 Barter Street; refurbishment and restoration of 16-20 Barter Street; formation of landscaped courtyard parking area on land at rear known as Monarch Yard. New buildings to be used as offices (Class A2 and B1) and residential. Restored buildings to be used as retail (Class A1) and residential. *(Plans submitted).	03/03/1988 Appeal received against the Council's failure to issue their decision within an appropriate period. Appeal withdrawn.
8800104 133 High Holborn, 1-3 Bloomsbury Court, 14-20 Barter St and Monarch Yard, WC1A 2AH	The redevelopment of 133-136 High Holborn/1-3 Bloomsbury Court and 14 Barter Street by the erection of a part 4 part 6 storey building for use as offices (Class B1 of the Town and Country Planning (Use Classes) Order 1987) (Class A2) and 10 residential flats with car parking for 7 cars and the refurbishment of 16 18 & 20 Barter Street for retail (Class A1) on the basement and ground floors and a total of 3 x 2 bedroom maisonettes on the upper floors as shown on drawing numbers A1/1484/45A 46A 50 & 60-67 revised by letters dated 26th May 1988 27th July 1988 and 4th August 1988.	Granted 03/03/1988
8702032	Redevelopment of 133-136 High Holborn 1-3 Bloomsbury Court and 14 Barter Street to provide a new building for	Appeal received

133 High Holborn, 1-3 Bloomsbury Court, 14-20 Barter St and Monarch Yard WC1	use as shops offices and residential accommodation; refurbishment and restoration of 16-20 Barter Street for use as shops and residential accommodation; formation of landscaped courtyard parking area on land at the rear known as Monarch Yard.	against the Council's failure to issue their decision within an appropriate period Appeal decided 31/07/1987
8702031 133-136 High Holborn 1-3 Bloomsbury Court and 14-20 Barter Street	The redevelopment of the sites of 133-136 High Holborn 1-3 Bloomsbury Court and 14 Barter Street by the erection of a 6-storey building containing 2 shops offices and 10 flats as shown on drawing numbers A1/1484/ 001/E 002/D 003/F 005/A 006/B007/C 008 009/B 013 014 015 & 016 revised by letter dated 12th October 1987.	31/07/1987 Refused
N14/23/L/33655/R1 1-3 Bloomsbury Court and 14 Barter Street	Renewal of the planning permission of 9th February 1977 (Registered No. 21550(R1)) for the erection of a building of basement, ground and three storeys over for use as basement stores, ground floor shops, first floor offices and second and third floors residential purposes subject to the conditions imposed thereon and subject to a variation in the mix of the residential accommodation to be provided in the scheme (continued on attached sheet).	Approved 26/01/1982
N14/23/L/21550 1-3 Bloomsbury Court	The erection of a building of basement, ground and 3 storeys over for use as basement stores, ground floor shops, 1st floor offices and 2nd and 3rd floors residential purposes.	Approved 30/09/1975
N14/23/L/13486 14, Barter Street and 1, 2, 3Bloomsbury Court, W.C.1.	Erection of a six storey building for use as offices on first, second, third floors and residentially on fourth and fifth floors at 14, Barter Street and 1, 2, 3Bloomsbury Court, W.C.1.	Refused 09/08/1972
N14/23/L/13666 14 Barter Street and 1-3 Bloomsbury Court	The use of the site of 14 Barter Street and 1,2,&3 Bloomsbury Court W.C.1 for a limited period for a car park.	Refused 16/05/1972

- 3.2 Application ref. 8800104 has been built out. The approval of details application ref. 8900364 show the approved elevations as they stand today.

Pre-application advice

- 3.3 The Council's pre-application advice was originally sought in June 2024 for the '*Construction of a two-storey roof extension plus gallery level and roof terrace, for the provision of three additional residential units.*' A pre-application meeting was held in July 2024 to discuss the proposals. Following the initial meeting, in line with Officers advice, revised plans were provided removing the gallery level and roof terrace and looking at different massing options for the extension.
- 3.4 A follow up meeting was held in October 2024 and Officers advised that the massing of the two storey extension was acceptable but that more work needed to be done on materiality and detailed design.

Further updated plans responding to the Officers comments were therefore provided in November 2024, with the written feedback provided by the Council on 06 December 2024. The written advice is summarised below, alongside commentary explaining how the application responds to the comments received.

Council's pre-application feedback	Our response
Land use	
Policy H1 of the Local Plan identifies self-contained housing as the borough's priority land use and seeks to maximise the provision of such housing. The proposal involves the provision of 3 no new self-contained units. As such, the principle of the development would comply with policy H1.	Noted and agreed. The proposals provide 3 much needed residential units.
Design and heritage	
As discussed in the meetings, the principle of a two-storey upwards extension is acceptable given the scale and height of neighbouring buildings and given that the application site is a corner property. It would also safeguard the setting of the listed buildings on Barter Street, especially given the set back top floor mansard and noting that the three-storey set back portion of the host building would be retained, allowing for a gap between the listed buildings and the increased massing. The massing would not feel out of character or at odds with the surrounding context.	Noted and agreed, the submitted CGIs show how the proposed massing sits comfortably within the street scene and will safeguard the setting of the listed buildings on Barter Street.
The most recent revision feels the most comfortable and better responds to the context of the surrounding Bloomsbury Conservation Area. A single mansard on top of the additional storey is more appropriate than the double mansard options that were previously shown. The massing, scale and form generally feel acceptable however further work is needed on the detailed design. Raising the existing roof parapet is a positive move, however the third and fourth floor look unbalanced as they read as having different floor to ceiling heights. There is a question as to whether the existing capping needs to be retained here, as removing the capping would help resolve this issue. If this is not possible, we can recommend either reducing the height of the fourth floor to match the third floor height or increasing the existing parapet further.	<p>Noted and agreed, the sheer brick fourth floor with a single mansard design looks comfortable on the host building.</p> <p>The parapet has been extended between the third and fourth floor to ensure that the two floors look balanced in terms of floor to ceiling heights. A new cornice is then added to match the existing.</p>
The introduction of the aluminium spandrel panel to avoid overheating is welcomed, however the window openings look too large and dominating when compared to the existing building. We recommend the window reveal to be reduced to the size of the window itself, and for the brick treatment to be continued, replacing the aluminium spandrel.	Recessed brick spandrels have been added to the fourth-floor windows and the window proportions have been made smaller to ensure that they do not appear dominant in comparison with the existing building.
The windows for the top floor also look out of proportion and character with the rest of the building, primarily on the Barter Street facade.	Additional windows and doors have been provided on the top floor in order to reflect the rhythm of the existing building more closely.

These should more closely follow the rhythm of the existing building, for example there could be smaller but more frequent windows. Similarly, these should not be full height windows in order to mitigate against overheating.	The lower panels of the top floor windows are proposed to be aluminium in order to mitigate against overheating.
Two options for the internal layouts of the units have been provided. Option A for the fourth floor layout seems more successful in terms of amenity space and environmental comfort.	Option A has been taken forward for the planning application, in line with Officers comments.
The removal of the roof terrace is welcomed along with the glazed structure that was previously proposed. This allows for a cleaner roof which is important given the visibility of the building in long views within the conservation area. Consideration should be given to the location of any plant so that it is not visible in public views, as visible plant is noted within the Bloomsbury CAAMS as being harmful.	<p>The roof terrace and glazed structure are not proposed as part of the application.</p> <p>No external plant is proposed as part of the application, where the proposed ASHP's are to be located internally within each flat.</p>
Amenity	
The proposal should minimise the impact on neighbouring occupiers in terms of sunlight/daylight, outlook, and privacy. It is noted that the application site sits to the north of taller buildings in the area, in particular, 137-144 High Holborn and 133-136 High Holborn. A daylight/sunlight impact assessment has been submitted as part of the pre-app submission. The report suggests that all the windows at neighbouring properties would meet the BRE guidelines when assessed against Vertical Sky Component for daylight and Annual Probable Sunlight Hours for sunlight. Camden accepts the urban range of 15% for VSC given the dense and built-up nature of the borough. The report should be updated to reflect the amended scheme at application stage.	The submitted Daylight and Sunlight Assessment has been updated for the latest scheme and confirms that the proposals comply with BRE guidelines.
As part of the submission, it should also be demonstrated that there wouldn't be a significant impact on daylight and sunlight on the host building, including the windows to the rear on the lower floors. In particular, the windows in the 'infill' section of the host building, below the terrace and next to no. 16 Barter Street. The terrace as well should be assessed so that sufficient light would be received here.	The submitted Daylight and Sunlight Assessment also assesses the impact on the host building and concludes that there is no impact on the flats or terrace to the flat below.
Given the distance to neighbouring buildings, the proposal, including the terraces, is unlikely to result in unacceptable overlooking. The width of the street is an accepted distance in Camden with regards to overlooking.	Noted and agreed, there will be no unacceptable levels of overlooking created by the proposals.
The terraces are unlikely to result in unacceptable noise pollution at neighbouring buildings, given their size, layouts and locations. If any plant is proposed, a noise impact assessment should be submitted.	No external plant is proposed, and it is agreed that the proposed terraces would not have the capacity to accommodate larger gatherings with the potential to generate any unacceptable noise disturbance.
Housing Mix and Quality of Accommodation	
The proposals would provide 3 flats, consisting of 2no 2b4p, and 1no 3b6p. Policy H7	Noted and agreed, the mix of two 2 bed and one 3 bed units is in accordance with policy H7.

encourages a mix of new unit sizes, and the proposed units would be classified as market housing. In general, there is higher demand for 2-bedroom and 3-bedroom market housing units, although a range of unit sizes is encouraged to enable more mixed and sustainable communities. The proposal would therefore generally comply with the unit dwelling mix and size.	
All new units would meet and possibly exceed the relevant standards as set out in the Nationally Described Space Standards. They would be at least dual aspect where possible and an adequate amount of head height and natural light would be provided. An internal light report for the proposed units should be provided at application stage to ensure this is the case, using the Council's preferred Spatial Daylight Autonomy test. All the units should aim to be accessible and adaptable in accordance with Building Regulations.	<p>All units exceed the national space standards, are dual or triple aspect and have adequate floor to ceiling heights.</p> <p>The submitted internal daylight assessment demonstrates a good level of light for the proposed new units.</p> <p>All units are M4(2) accessible.</p>
Affordable housing	
The Council will accept a payment-in-lieu of affordable housing where developments have capacity for fewer than 10 additional dwellings. A payment-in-lieu (PIL) would therefore be acceptable in this instance as fewer than 10 units are proposed. The payment rate for housing development for payment-in-lieu is £5,000 per sqm GIA. Targets are based on an assessment of development capacity whereby 100sqm (GIA) of housing floorspace is generally considered to create capacity for one home. Given the existing property is in C3 use, the proposed uplift on new residential floorspace is approx. 329sqm resulting in a PiL of £98,700.	The affordable housing contribution can be secured via a S106 agreement.
Transport	
In line with policy T2, the additional units would be car free with no parking on street. A car free agreement would be secured under a section 106 legal agreement.	Noted, the scheme is car free, and this can be secured in a S106 agreement.
Whilst the proposed ground floor plan shows 6 cycle lockers for folding bikes, this is considered to be a poor offering in that not all residents will own such a cycle. Given the lack of space available at ground level, it is considered appropriate in this instance to seek a Section 106 cycle parking contribution of £4,320 towards the provision of a 6 space bike hanger to be provided in the vicinity of the site. Whilst there is a suggestion in the DAS that they would be supplying the new residents with folding cycles (such as Brompton), this would be difficult to enforce in practice. As such, the s106 cycle parking contribution is required.	Noted, the previously proposed cycle lockers have been removed and a cycle parking contribution can be secured via a S106 agreement.
Given the location of the site with Central London, it will be necessary to secure a Construction Management Plan and associated	A draft CMP has been submitted with the application. The necessary contributions can be secured via a S106 agreement.

Implementation Support Contribution of £4,194 and Impact Bond of £8,000 by means of the Section 106 Agreement. This will help ensure that the proposed development is carried out without unduly impacting neighbouring amenity, or the safe and efficient operation of the local highway network, in line with Policies A1 and T4 of the Camden Local Plan.	
Sustainability	
A sustainability statement, addressing sustainable design and construction measures should be submitted as part of a full planning application. Measures to address the risk of overheating should be addressed following the cooling hierarchy and active cooling measures should be avoided where possible.	The submitted Energy and Sustainability Statement sets out the proposed sustainability measures and proposals to reduce overheating.
The Council's Energy Efficiency and Adaptation CPG indicates a need for carbon emission reductions 19% below Part L of 2013 Building Regulations for minor residential developments.	The submitted Energy and Sustainability Statement sets out that A 'Lean, Clean, Green' has been adopted and that the development achieves an improvement in build fabric at over 41.31% at the "Be Lean" stage and an overall improvement (DER/TER) in regulated emissions at over 82.83% above Part L 2021 standard, through the adoption of very high standards of insulation, heat pump driven heating and hot water systems and a roof mounted PV array.
Excessive glazing, and floor to ceiling windows can lead to poor thermal efficiency and overheating. The provision of PV panels and the green roof are welcomed, and full details should be submitted at application stage. There is also an opportunity to improve the overall energy efficiency of the existing building, through renewable energy sources and air source heat pumps.	The submitted Energy and Sustainability Statement sets out the proposed sustainability measures and proposals to reduce overheating.
The application is likely to be exempt from Biodiversity Net Gain requirements, however this should be clarified as part of the submission.	The site currently has no vegetation or soft landscaping, and the existing building footprint covers the majority of the site with the remaining site made up of hard surfaces. The proposed development is therefore exempt from Mandatory Biodiversity Net Gain under the 'de minimis' ('below the threshold') exemption.

Consultation

- 3.5 A meeting was held to present the scheme to the leaseholders in the building on the 14 January 2025. Consultation letters were also sent out to neighbouring properties on 19 February 2025. These offered interested parties an opportunity to discuss the proposals prior to the submission of the application.
- 3.6 Email correspondence has been received from one neighbouring resident, who has concerns about the implications of the proposed development on daylight and sunlight in their property and on parking, however it should be noted that the proposals are in accordance with the BRE guidelines and are car free. No further correspondence has been received by other neighbours to date.

4.0 Planning policy framework

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act and Section 70(2) of the Town and Country Planning Act 1990 (as amended) outline the requirement for planning applications to be determined in accordance with the development plan for an area unless material considerations indicate otherwise. This legal requirement is reiterated within the introduction of the National Planning Policy Framework (NPPF).
- 4.2 The adopted development plan for the site comprises of the following documents:
- Camden Local Plan (July 2017)
 - London Plan (March 2021)
- 4.3 The Council has published a Draft New Camden Local Plan (Regulation 18) which was consulted on from 17 January to 13 March 2024. The weight which should be afforded to draft policies is guided by paragraph 49 of the NPPF and paragraph 049 of the Planning Practice Guidance (PPG). As the draft Plan is still in its early stages, in our view it should not currently be afforded weight. The proposals are therefore not assessed against the draft policies in this statement. In any case, the proposals do not conflict with the draft policies.
- 4.4 The following documents are material considerations:
- National Planning Policy Framework (February 2025)
 - Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011)
 - Camden Design SPD (January 2021)
 - Camden Housing SPD (January 2021)
 - Camden Amenity SPD (January 2021)

5.0 Planning considerations

5.1 The main planning considerations for the proposed development include:

1. Principle of development;
2. Heritage and design;
3. Housing mix;
4. Affordable housing;
5. Quality of accommodation;
6. Amenity considerations;
7. Transport;
8. Energy and sustainability;
9. Ecology and biodiversity;
10. Flooding and SuDS; and
11. Fire.

1. Principle of development

5.2 Paragraph 125(c) of the NPPF states that planning decisions should give **substantial weight** to the value of using suitable brownfield land within settlements for homes, and such proposals **should be approved unless substantial harm would be caused** [our emphasis].

5.3 Increasing the housing stock for the borough is key objective as set out in policy H1 of the Camden Local Plan. Policy H1 of the London Plan sets a target for the Borough of 10,380 housing completions between 2019/20 and 2028/29.

5.4 London Plan policy H2 also supports well-designed new homes on small sites (below 0.25 hectares in size).

5.5 The latest 2023 Housing Delivery Test shows the Council had delivered 53% of its housing target against the three years between 2020 and 2023. As a consequence of failing the HDT test, paragraph 11d of the NPPF is engaged (the ‘tilted balance’). This means that planning permission should be granted for new homes unless there are “*adverse impacts which would **significantly and demonstrably outweigh its benefits**, when assessed against the policies of the Framework as a whole*” [our emphasis].” The Council is not able to meet its current housing targets due to its highly constrained urban nature and following the publication of the updated NPPF, the borough target has increased putting more pressure on the Council’s constrained land supply. Sites like this one are scarce in the borough and it is therefore critical that it is optimised through a design-led approach, which the submitted proposals achieve.

5.6 The proposed scheme provides 3 new residential units, which Officers welcomed during the pre-application. This optimisation of this highly accessible brownfield site will provide a small but valuable contribution to the Council’s housing stock and delivery backlog and is strongly supported by policy.

2. Heritage and design

5.7 Policy D3 of the London Plan states that development proposals should be of high quality, enhancing 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.

5.8 London Plan policy HC1 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.

5.9 Policy D1 of the Local Plan states that the Council will seek to secure high quality design in development through respecting local context and character, preserving or enhancing the historic environment,

sustainable design and construction, ensuring that development is inclusive and accessible for all and provides a high standard of accommodation.

- 5.10 Policy D2 of the Local Plan states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas.
- 5.11 The design of the proposed extension has evolved through pre-application discussions with the Council and has been carefully considered to respond to the existing character of the host building and the surrounding context of Barter Street in terms of scale, form, materials and elevational treatments. The fourth floor is proposed to be a sheer extension of the overall brickwork, with a zinc clad mansard roof extension proposed at fifth floor level. The scale, massing and design of the proposed development sits comfortably in the street scene and surrounding context, as shown in the view below.



Above: Verified view of the proposed development from the west of Barter Street

- 5.12 The existing façade of the building lacks quality and rigour, appearing somewhat squat and unbalanced with a weak termination/parapet. The third-floor cornice is proposed to be reinstated at a slightly higher level, giving the 3rd-floor windows adequate breathing space and improved proportions, ensuring the newly proposed fourth and fifth floor extensions remain subservient and well-balanced as part of the overall façade composition. The proposals also resolve the current squashed hierarchy of the façade.
- 5.13 The proposed extension also responds directly to the immediate context in terms of height. The adjacent building Hogarth House is six stories high, and Holborn Tower forms its backdrop to the west. The existing building is already a storey higher than the neighbouring terrace 16-20A Barter Street and the proposals set back the massing at fifth floor level to limit any impact upon the listed buildings. The proposed height is also a direct response to the opposite neighbour at 17-19 Barter Street, from which the proposed parapet and top of the 5th floor draw a direct relationship. The Council confirmed in their pre-application response that *“the massing, scale and form generally feel acceptable.”*
- 5.14 The proposed building would be taller than its historic neighbour, but the visual impact is mitigated by setting back the top storey and the sensitive design. The additional massing is also read in the immediate context and backdrop of taller buildings, thus preventing the extension from encroaching on any townscape gaps or creating a sense of enclosure. This allows the proposal to remain respectful and

appropriate to the setting of the nearby heritage assets, whose settings are already defined by the presence of taller buildings, as shown in the visual below. The Council confirmed in their pre-application advice that the proposals would “safeguard the setting of the listed buildings on Barter Street, especially given the set back top floor mansard and noting that the three-storey set back portion of the host building would be retained.”



Above: Verified view of the proposed development from the east of Barter Street

- 5.15 The proposed arrangement of fenestration was also discussed at the pre-application stage and has been led by an analysis of existing positioning of openings. Given the poor quality and more ad-hoc arrangement of fenestration on the existing buildings third floor, it is considered most appropriate to set out the proposed mansard fenestration based on the patters of windows between the ground and 2nd floor levels. Recessed brick spandrels have also been added to the fourth-floor windows and the window proportions have been made smaller to ensure that the do not appear dominant in comparison with the existing building. Additional windows and doors have also been provided on the top floor in order to reflect the rhythm of the existing building more closely and the lower panels of the top floor windows are proposed to be aluminium in order to mitigate against overheating in line with Officers comments at the pre-application stage.
- 5.16 Photovoltaic panels (PV) and a green roof have also been proposed on the fifth floor roof, which are not visible from public views within the conservation area. Internal ASHPs are also proposed in order to avoid any rooftop clutter.
- 5.17 The submitted Heritage Statement concludes that the impact of the proposed works would not harm and would rather assist in the long-term use and appreciation of the relevant heritage assets. It is therefore concluded that the proposed works satisfy the relevant clauses of the NPPF. These are consistent with the spirit of local policies and national conservation principles.
- 5.18 In view of the above, the proposed development is in accordance with policies D3 and HC1 of the London Plan and policies D1 and D2 of the Local Plan.

3. Housing mix

- 5.19 Policy H7 of the Local Plan states that the Council will aim 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 ‘Dwelling size Priorities Table’ sets out the

Camden have a high priority for 2-bed and 3-bed market homes, and that 1-bed and 4-bed homes are a 'lower priority.'

- 5.20 The proposals include a mix of two new 2-bedroom units and one 3-bedroom unit. The proposed development is therefore in accordance with policy H7 of the Local Plan and this was confirmed by the Council in their pre-application advice.

4. Affordable housing

- 5.21 Policy H4 of the Local Plan states that the Council will aim to maximise the supply of affordable housing and that the Council will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.
- 5.22 A policy compliant affordable housing contribution can be secured via a S106 agreement.

5. Quality of accommodation

Internal

- 5.23 Policy D6 of the London Plan requires that all new housing developments achieve a high quality of design. The policy also refers to the Technical Housing Standards – Nationally Described Space Standard and is supported by the Mayor of London Housing SPG (Mayor's Housing SPG).
- 5.24 Policy D6 of the London Plan also sets out that housing development should be of high-quality design and provide adequately sized rooms (as set out in Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. With regards to internal space standards, Camden's Housing SPD requires compliance with the floorspace standards and minimum floor to ceiling heights set out in national space standards but encourages the London Plan ceiling height of 2.5m for at least 75% of its gross internal area (GIA). Housing development should maximise the provision of dual aspect dwellings.
- 5.25 London Plan policy D7 requires that at least 10 per cent of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and that all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- 5.26 The proposals exceed the minimum space standards and minimum floor to ceiling heights required under London Plan policy D6. All habitable rooms have been designed to receive good levels of natural light, satisfactory outlook and natural ventilation. All flats are proposed to be double or triple aspect, delivering good levels of light intake and outlook, as confirmed in the submitted Internal Daylight Assessment for the new units, which confirms that the new residential units will benefit from daylight levels in excess of the requirements of BSEN 17037:2018 recommendations.
- 5.27 The residential units have been designed to meet Building Regulation requirement M4(2).

External

- 5.28 Policy D6 of the London Plan states that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant. In addition, the private outdoor space should have a minimum width and depth of 1.5m.
- 5.29 The proposed residential units all have access to policy compliant balconies, with the fifth floor, 3-bedroom family unit being largely in excess, having access to a 52sqm roof terrace.

6. Amenity considerations

- 5.30 Policy A1 of the Local Plan states that the Council will seek to protect the quality of life of occupiers and neighbours ensuring that proposals will not cause unacceptable harm to amenity.

Daylight and sunlight

- 5.31 The scheme has been designed and orientated in order to maximise daylight and sunlight for both the proposed building and the surrounding residential properties. The potential daylight and sunlight impacts on the nearest residential properties have been tested in the submitted Daylight & Sunlight Assessment, which confirms that the development is 100% BRE compliant.

Outlook, privacy and sense of enclosure

- 5.32 The proposals have also been carefully designed and orientated in order to limit any impact upon the neighbouring properties in terms of outlook, privacy and sense of enclosure. The proposed massing is stepped in at fifth floor level in order to lessen any impact. The proposals are not considered to create a sense of enclosure for any neighbouring residents.
- 5.33 The north and western elevations look out onto Barter Street and Bloomsbury Court respectively. The windows have been positioned so that they do not directly look into the building opposite on Barter Street and the road also provides good separation. The orientation of Holborn Tower is also different to Lytton Court and the site is located adjacent to a one storey section of the tower where there are no residential dwellings. As such, no harmful overlooking will occur. Only one small window is proposed towards Hogarth House to the south and there is good separation, and the proposed windows and terrace to the east are higher than any of the existing buildings and look out over the rooftops of neighbouring properties and a shared car park. Fixed and obscure windows are however proposed to unit 1 and a planter is proposed to the northeastern edge of the terrace at fifth floor level to ensure no overlooking to the terrace below. As such, there is no harmful impact on neighbouring amenity. This was agreed by Officers at the pre-application stage, who confirmed that *“given the distance to neighbouring buildings, the proposal, including the terraces, is unlikely to result in unacceptable overlooking. The width of the street is an accepted distance in Camden with regards to overlooking.”*

Noise

- 5.34 No external plant is proposed, and the proposed terraces would not have the capacity to accommodate larger gatherings with the potential to generate undue levels of noise disturbance.
- 5.35 In light of the above, the proposed development is in accordance with local plan policy A1.

7. Transport

- 5.36 Policy T2 of the London Plan states that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. This policy also states that development proposals should reduce the dominance of vehicles on London’s streets whether stationary or moving.
- 5.37 Policy T6 of the London Plan states that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking. This is echoed in Local Plan policy T2 which states that the Council will limit the availability of parking and require all new developments in the borough to be car-free.
- 5.38 Policy T5 of the London Plan sets out the cycle parking requirements.
- 5.39 The proposed development is ‘car free’ in line with local and London Plan standards/policies which encourage mode shifts to alternate modes of transport, for example public transport, walking and cycling.
- 5.40 There is no internal bike store or external space for cycle parking spaces, so at the pre-application stage the proposals included 6 folding cycle storage lockers for the proposed flats in the ground floor reception area. The Council advised however that in practice that would be hard to enforce and as such advised

that “given the lack of space available at ground level, it is considered appropriate in this instance to seek a Section 106 cycle parking contribution of £4,320 towards the provision of a 6 space bike hanger to be provided in the vicinity of the site.” The proposed contribution can be secured via a S106 agreement.

- 5.41 The proposals also include additional refuse provision at ground floor level to meet the Council’s requirements. The bin store for the existing flats in the building remains unchanged.
- 5.42 A draft Construction Management Plan has been submitted using Camden’s CTMP template. A final CTMP can be conditioned as necessary.
- 5.43 The proposals are therefore considered to be in accordance with policies T2, T5 and T6 of the London Plan and T2 of the Local Plan.

8. Energy and sustainability

- 5.44 Policy CC1 of the Local Plan states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Policy CC2 of the Local Plan requires any development involving 5 or more residential units or 500 sqm or more of any additional floorspace to submit a Sustainability Statement.
- 5.45 Policy CC4 of the Local Plan seeks to ensure that the impact of development on air quality is mitigated, to ensure that exposure to poor air quality is reduced in the borough.
- 5.46 The proposed development has been designed in order to maximise sustainability standards, seeking to achieve high standards of sustainable design and construction in order to minimise the effects of climate change. The submitted Energy and Sustainability Statement sets out that a ‘Lean, Clean, Green’ has been adopted and that the development achieves an improvement in build fabric at over 41.31% at the “Be Lean” stage and an overall improvement (DER/TER) in regulated emissions at over 82.83% above Part L 2021 standard, through the adoption of very high standards of insulation, heat pump driven heating and hot water systems and a roof mounted PV array.

9. Ecology and biodiversity

- 5.47 Policy G6(D) of the London Plan states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. Policy CC2 of the Local Plan states that all development should adopt appropriate climate change adaptation measures such as incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate.
- 5.48 The site currently has no vegetation or soft landscaping, and the existing building footprint covers the majority of the site with the remaining site made up of hard surfaces. The proposed development is therefore exempt from Mandatory Biodiversity Net Gain under the ‘de minimis’ (‘below the threshold’) exemption, which is defined as follows:

“A development that does not impact a priority habitat and impacts less than:

- 25 square metres (5m by 5m) of on-site habitat*
- 5 metres of on-site linear habitats such as hedgerows*

A development ‘impacts’ a habitat if it decreases the biodiversity value.”

- 5.49 Regardless, the scheme is designed to maximise biodiversity by proposing a green roof. This presents an improvement over the existing condition by maximising the provision of greenery in line with Local Plan policy CC4.
- 5.50 In terms of ecology, the submitted Preliminary Roost Assessment also concludes that the building is considered to have ‘negligible’ suitability for roosting bats and no further surveys are required.

10. Flooding and SuDs

- 5.51 Local Plan policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible. Part E of the policy seeks to utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible.
- 5.52 The submitted Flood Risk Assessment and SuDs Strategy demonstrated that the development is not at risk of flooding and will not increase flood risk elsewhere. The report sets out how a 40sqm green roof has been incorporated into the proposals and will reduce discharge rates, improve water quality, provide attenuation at source and support urban cooling and biodiversity. The report concludes that the strategy effectively balances flood risk management with site constraints, ensuring compliance with national and local planning policies while providing a practical and sustainable solution for surface water management.

11. Fire

- 5.53 Policy D12 of the London Plan states that to ensure the safety of all building users, all development proposals must achieve the highest standard of fire safety.
- 5.54 The proposed building does not meet the threshold of a high-risk building, but a fire strategy has been developed with regard to the relevant regulations and policies, which has informed the final design. The submitted Fire Statement demonstrates that the proposed development complies with the requirements of the London Plan Policy D12(A) and may be considered acceptable with regard to fire safety planning.

6.0 Conclusion

- 6.1 This statement demonstrates that the proposed development complies with the development plan. The appearance of the site will be significantly enhanced; 3 much needed new homes will be provided; future occupiers are provided with good quality living accommodation; neighbouring residential amenity is preserved; sustainability and biodiversity are enhanced; there are no adverse transport impacts; and the development complies with the Council's environment policies.
- 6.2 The titled balance under paragraph 11(d) of the NPPF also applies which is a significant material consideration. It has been demonstrated in this statement that the proposed development complies with the development plan. However, if the planning balance is weighed at any stage, the balance is significantly in favour of permitting the development. There are no adverse impacts which significantly and demonstrably outweigh the benefits that the development will deliver. The planning balance weighs heavily in favour of permitting and planning permission should therefore be granted.
- 6.3 As set out earlier in this statement, the development will deliver the following public benefits:
- The redevelopment of an underutilised brownfield site to provide new homes. Paragraph 125 of the NPPF gives substantial weight to the value of using suitable brownfield land within settlements to provide new homes;
 - The provision of 3 homes for the Council's housing stock. This should be given substantial weight given the acute housing shortage in the borough;
 - The ongoing economic benefit of 3 net additional households (Council Tax payments, net spend of residents into the local economy etc.);
 - Enhancement of the existing building's design, hierarchy and proportions through resolving the current unsatisfactory weak termination and the poor quality, meanly proportioned third-floor to balance more effectively with the proposed extension. This enhancement would benefit the wider Conservation Area, providing a better-quality corner building that relates well to the surrounding townscape;
 - Improved sustainability and biodiversity through the provision of internal Air Source Heat Pumps and a green roof;
 - The provision of an affordable housing payment;
 - Improvement of the overall fire safety of the building through introducing new fire safety measures;
 - Improvements to local infrastructure through a Community Infrastructure Levy (CIL) contribution; and
 - Creation of construction jobs throughout the construction of the development.
- 6.4 The Council is therefore respectfully requested to grant planning permission for the proposed development.