1. INTRODUCTION

The Statement of Common Ground has been prepared by the Appellant but is submitted jointly by the Council and the Appellant. The purpose of this Statement is to set out as much of the agreed factual information about the proposal as is possible.

Where there remains a difference of opinion between the parties, the Council’s comments/additions are set out in **bold underlined type**, whereas the Appellant’s comments are set out in **bold type**

1. SITE DESCRIPTION

The application site is a ‘T’ shaped building which is currently in use as offices and associated storage. It was a former School House dating from the 19th Century.

To the east is an eleven storey hotel dating from the early 90s (permission granted 8900385). The hotel is a dominant feature in the street scene and is of a scale far in excess of the 2/ 3 storey historic properties nearby. Adjoining the site to the west are a group of 3 three storey Grade II Listed houses nos.45 to 49 Calthorpe Street. To the north is a school and the northwest a terrace of two storey mid 19th century cottages.

The site lies within the strategic viewing corridors of Kenwood to St Pauls and Parliament Hill to St Pauls and is in the Central London Area, though no objection is raised relative to these views. The Bloomsbury CAAMS identified the building as a positive feature in the area, and has thus included the site within the Bloomsbury Conservation Area boundary, and has designated the building as a positive contributor within the Conservation Area.

A planning brief has just been completed for the residential-led redevelopment of the Royal Mail sites on either side of Phoenix Place.

1. PLANNING HISTORY

The Appeal scheme was preceded by an earlier iteration of a redevelopment proposal and was redesigned in light of the reasons for refusal set out in the Decision Notice dated 16 April 2013.

Without change to the scheme, the Borough now longer alleges harm relative to flooding, or on-site amenity issues.

1. AGREED DRAWINGS NUMBERS

To be agreed with Borough

1. RELEVANT POLICY/GUIDANCE

It is agreed that the following are the most relevant policy/guidance considerations in respect of this Appeal: -

National Policy

* National Planning Policy Framework
* By Design – Better Places to Live – A Companion Guide to PPG3 (September 2001)
* PPS5 Practice Guidance
* Planning System: The General Principles

**Development Plan Policy**

* The London Plan July 2011 (Early Revisions Oct 2013)
* The London Borough of Camden **Core Strategy** and **Development Policies** for the Local Development Framework November 2010
1. ISSUES

Arising from the determination there are two key issues to be determined, namely:

* *Whether or not the development is harmful to the character of the building and the wider context?*
* *Whether or not affordable housing delivery is compliant with the Development Plan?*

The Appellant will submit a S106 Planning Obligation to deal with other RfR’s.

1. CONDITIONS

The following conditions have been suggested by the Borough. The Appellants comments are provided in **bold type:**

1. AGREED ISSUES

The issues set out below are those put forward by the Appellant. Where the Council objects or suggests changes to the proposed wording these are shown bold underlined type: -

* + 1. There is no disagreement between the parties that the site is a sustainably-located, previously developed site in the urban area of Camden.
		2. The site is in a highly sustainable location, being situated within a designated Town centre, and numerous public transport opportunities.
		3. It is an appropriate site, in principle for re-developing, subject of course, to such being for appropriate uses and with a building of an appropriate scale with all other matters considered.
		4. No objection is raised to the change of use from employment to residential
		5. The Design and Access Statement submitted with the planning application, and its analysis of context and design response, has never been the subject of criticism by Officers, nor by qualified external staff save in so far as the development proposals are analysed in the officers report.
		6. There is priority policy support for the provision of permanent accommodation in the Development Plan.
		7. Save for those Development Plan policies referred to in the reasons for refusal, the LPA agrees that the scheme accords with the remainder of the Development Plan.
		8. The appeal is to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
		9. Housing is the priority land use of the Development Plan.
		10. No amenity objections relative to neighbours are raised by the appeal scheme
		11. The Appellant undertook a full pre-application process.
		12. No on-site delivery partner has been identified by the LPA