

**EXPLANATORY STATEMENT IN SUPPORT OF A FULL PLANNING APPLICATION FOR THE  
CONVERSION AND CHANGE OF USE OF THE REAR OF NO.26 ARGYLE SQUARE, LONDON WC1  
FROM B1 / D1 USE TO USE CLASS C3, COMPRISING THREE RESIDENTIAL UNITS INCLUDING AN  
EXTENSION AT ROOF LEVEL, AND RETAINING 120SQ.M OF B1 USE**

#### **4.0 CONFORMITY TO PLANNING POLICIES**

##### **4.1 Relevant Planning Policies**

Policies relevant to this proposal are given in the Camden Adopted UDP and the Revised Deposit Draft UDP 2004 and also in the government's strategic planning guidelines (PPG1 and PPG 3). The degree to which this application conforms to those policies is assessed below. A separate Design and Access Statement has been prepared and included as part of this application.

No.26 Argyle Square is within the designated Central London Area (CLA) of Camden.

##### **4.2 Conformity to Housing, Mixed Use and Employment Policies**

The site is within the designated CLA where mixed use is encouraged. As the site is not identified or designated as a housing site, the proposal to convert and extend the existing building to provide three dwellings and retain a proportion of B1 employment space supports the Council's Mixed-use, Housing and B1 Use policies.

##### **Windfall Increase to Housing Stock**

The proposal offers a small windfall increase to the borough's housing stock especially in the Central London Area, in support of the stated policies in the Adopted UDP and Revised Deposit Draft 2004 Section 2 Housing:

Revised Deposit Draft 2004 Section 2 Housing:

- aims to provide for and retain a range of high quality housing to meet housing needs;
- to promote housing that is accessible to all members of the community.

Revised Deposit Draft 2004 Policy H1 - New Housing:

- states that the Council will grant planning permission for development that increases the amount of land and floorspace in residential use and provides residential accommodation, provided that the accommodation reaches acceptable standards.
- states that the Council will seek to secure the fullest possible residential use of vacant and underused sites and buildings, and may require suitable sites to be developed for primarily or wholly residential use.

##### **Sustainability: Previously-used Site**

- By undertaking a conversion rather than redevelopment, thus re-using the building fabric, the proposal is a sustainable one and makes the best use of "previously-built" land and buildings, in support of stated policies in Section 1 of the Revised Deposit Draft 2004, in particular, Policy SD1 B Regeneration in which King's Cross and Brunswick is highlighted as an area for renewal.

**EXPLANATORY STATEMENT IN SUPPORT OF A FULL PLANNING APPLICATION FOR THE  
CONVERSION AND CHANGE OF USE OF THE REAR OF NO.26 ARGYLE SQUARE, LONDON WC1  
FROM B1 / D1 USE TO USE CLASS C3, COMPRISING THREE RESIDENTIAL UNITS INCLUDING AN  
EXTENSION AT ROOF LEVEL, AND RETAINING 120SQ.M OF B1 USE**

**Sequential Test/ Development in CLA**

- The site is situated within the CLA and in close proximity to the hub of public transport and international transportation network (not least the new St Pancras International Eurotunnel Station, Kings Cross Station (LUL and National Rail links) as well as bus links. Therefore, the proposal satisfies the sequential test:

Adopted UDP Policy RE4 states with reference to RE4b Central London Area:

"..In assessing such developments, the Council will apply a sequential test..." and

Para 3.43 of the UDP states:

"...The approach adopted is to guide new development to locations which reduce the need for car journeys and the distances driven, or which permit the choice of more energy-efficient public transport - without encouraging more or longer journeys. This approach further suggests locating new development types that attract trips (for example, office employment, shopping, higher education and leisure) at points such as town centres which are capable of acting as nodes for public transport networks to avoid encouraging substantial increase in car use and where there may be advantages in enabling one journey to serve several purposes."

Revised Deposit Draft 2004 Policy SD5 - Location of development with significant travel demand:

- Central London Area is one of the first order of preference for development that significantly increases travel demand.

**Residential Density**

The proposed density for the residential uses is 370hrha. The proposed development maximises the use of the site with an appropriate residential density. The proposal is supported by adopted UDP policies which suggests a density range in the Central Area density standard for mixed or non-family housing of between 247 to 617 hrha (habitable rooms per hectare) .

Revised Deposit Draft 2004 Policy SD4 Density of Development:

- states that the Council will grant planning permission for development that makes full use of the potential of a site;
- expects high density development in Central London Area locations;
- factors which will be taken into account include: the character, amenity and density of the surrounding area; the nature of the site; the quality of the design; the type of development being provided; the availability of local facilities, services and open space; accessibility by public transport and the potential impact on the local transport network.

**EXPLANATORY STATEMENT IN SUPPORT OF A FULL PLANNING APPLICATION FOR THE  
CONVERSION AND CHANGE OF USE OF THE REAR OF NO.26 ARGYLE SQUARE, LONDON WC1  
FROM B1 / D1 USE TO USE CLASS C3, COMPRISING THREE RESIDENTIAL UNITS INCLUDING AN  
EXTENSION AT ROOF LEVEL, AND RETAINING 120SQ.M OF B1 USE**

**Suitable Housing Mix**

The proposal provides three spacious residential dwellings with one-bedroomed and two-bedroomed units that are suitable for a single person, a couple or a small family. The proposal supports Revised Deposit Draft 2004 Policy H8 - Mix of Units and Para. 2.61 which seeks a mix of large and small residential units.

**Access to Amenity Space**

The property is only 40m from Argyle Square public garden which offers a range of passive recreational areas and active children's play area. The occupiers of Units 1 and 2 will be able to access this facility easily. In addition, Unit 3 has its own private patio and terrace. Therefore the proposal conforms to the Council's the criteria which only requires access to gardens or public open space or within 400 metres of public open space for units with three or more bedrooms.

**Lifetime Homes**

Units 1 and 2 can be adapted with a stairlift if required for lifetime homes. However, due to the nature of the existing building, it is not a practical solution. Therefore the proposal currently does not conform to Revised Deposit Draft 2004 Policy H7 – Lifetime Homes and Wheelchair Housing. However, wheelchair access is possible for the retained B1 / D1 floor area as explained in Section 4.3 below.

**4.3 Business Use Policies**

The proposal to retain 120sq.m of B1 floor area within a mixed-use scheme to provide one or two small units that are suitable for small and start up businesses or exhibition space conform with the Council's policies to support and encourage small firms in the CLA and for mixed-use developments:

**Mixed Use**

The proposal accords with Adopted UDP Policy EC3 and para. 7.26 which seeks to incorporate mixed-uses in new developments and Revised Deposit Draft 2004 Policy E1 - Location of Business Uses which encourages business to be located in the CLA or other locations suitable for a mix of uses.

**Location of Business in the CLA**

The proposal supports the Council's objective to maintain economic activity in the CLA, in accordance to Adopted UDP Policy EC3 and para. 7.26 and Revised Deposit Draft 2004 Section 7 - Economic Activities which:

- recognise the role of the CLA for economic and employment generation; and
- states that Use Class B1 as a desired land use;



**EXPLANATORY STATEMENT IN SUPPORT OF A FULL PLANNING APPLICATION FOR THE  
CONVERSION AND CHANGE OF USE OF THE REAR OF NO.26 ARGYLE SQUARE, LONDON WC1  
FROM B1 / D1 USE TO USE CLASS C3, COMPRISING THREE RESIDENTIAL UNITS INCLUDING AN  
EXTENSION AT ROOF LEVEL, AND RETAINING 120SQ.M OF B1 USE**

**Providing Suitable Accommodation for Small Firms**

The proposal aims to make the existing accommodation suitable to the needs of small firms and accords with Adopted UDP Policy EC3, EC5 and para. 7.26 and Revised Deposit Draft 2004.

Adopted UDP Policy EC5 and Revised Deposit Draft 2004 Policy E3 C and Policy E3 E which seeks accommodation for small firms (50 to 120sq.m) and to retain and promote creative and environmental industries. Revised Deposit Draft 2004 Section 7 - Economic Activities seeks to:

- guide business development to appropriate locations in the borough; and
- provide for a range of business needs and to maximise job opportunities.

**High Degree of Accessibility to Public Transport**

The application site is situated within immediate walking distance to the road, rail and LUL network, accessible to London, national and international destinations. The proposal to retain some of the B1 floorspace in the small units that are in demand satisfies the local plan's criteria to locate business uses in suitable CLA locations. The proposal supports Revised Deposit Draft 2004 Policy E1 - Location of Business Uses; Policy E2 and paragraphs 7.12, 7.13 and 7.14:

- permission for office development in locations accessible by a choice of means of transport, subject to SD5 (sequential test).
- located in the CLA or other locations suitable for a mix of uses;
- is easily accessible to the Transport for London Road Network and/or London Distributor Roads;
- is, or will be, accessible by means other than car;
- provides adequate on-site vehicle space for servicing'
- is well related to nearby land uses;
- protects residential amenity; (Revised Deposit Draft 2004 Policy E1)

Revised Deposit Draft 2004 Policy E2 and paragraphs 7.12, 7.13 and 7.14:

- states that the Council will not grant planning permission for development that involves the loss of a business use on a site where there is potential for that use to continue.
- whether the site is particularly suitable for small firms;
- the accessibility of the site by public transport and by service vehicles;
- the relationship of the site to nearby land uses;
- the demand, supply and variety of sites that are suitable for employment uses, firstly in the particular use class, and secondly in business use in general;
- seek to retain land and buildings that are currently suitable or have the potential to remain suitable either through redevelopment or alteration for business use, and will resist a change to non-business use.

**EXPLANATORY STATEMENT IN SUPPORT OF A FULL PLANNING APPLICATION FOR THE  
CONVERSION AND CHANGE OF USE OF THE REAR OF NO.26 ARGYLE SQUARE, LONDON WC1  
FROM B1 / D1 USE TO USE CLASS C3, COMPRISING THREE RESIDENTIAL UNITS INCLUDING AN  
EXTENSION AT ROOF LEVEL, AND RETAINING 120SQ.M OF B1 USE**

**Sequential Test and Sustainability**

The application site satisfies the "sequential test" for the location of new employment developments to be within the existing areas of business in accordance with the above policies and conforms to Adopted UDP Policy EC3: sequential test will be applied to new developments.

No.26 Argyle Square is situated in the heart of the Central London business, commercial and entertainment core, being within close proximity to key public transport facilities. The site is therefore unequivocally an appropriate location for employment accommodation for workers to travel-to-work by all forms of public transport and where facilities are easily available for employees (e.g. restaurants, shops and entertainment, etc.) The application site therefore satisfies the above policies - UDP Policy RE4 and Revised Deposit Draft Policy SD5 regarding the location of development and accessibility; and UDP Paragraph 3.43, which highlights the need for land uses to comply with current Government guidance on sustainability.

**Wheelchair Access**

The B1 units are situated on Ground and Lower Ground Floor, accessed by an existing ramped entrance. The Lower Ground Floor unit can be accessed by a chairlift or stairlift which will be provided by the occupier of the premises. The W.C. on the lower ground level is at grade and can be accessed by wheelchair users.

**4.4 Policies for Parking and Servicing**

**Parking**

The applicant already holds resident permits but will agree to limit that to the existing number of permits in support of the Council's policies to discourage car use in the CLA in accordance with Revised Deposit Draft 2004 Policy T8. No car parking spaces are provided for the B1 use.

The proposed B1 space is 120sq.m and therefore, no specific requirements apply for parking for people with disabilities:

**Cycle Parking**

Revised Deposit Draft 2004 Policy T3 - Pedestrians and Cycling:

- encourages walking and cycling and seeks the provision of secure cycle parking and related facilities.

According to Revised Deposit Draft 2004 Appendix 6 - Cycle Parking Standards, cycle spaces are only required for B1 Uses of 500sq.m or more, therefore there is no requirement for this proposal.

One cycle space per unit is sought for the C3 Residential uses. However, this is not possible for the existing building and therefore, is not provided.

**EXPLANATORY STATEMENT IN SUPPORT OF A FULL PLANNING APPLICATION FOR THE  
CONVERSION AND CHANGE OF USE OF THE REAR OF NO.26 ARGYLE SQUARE, LONDON WC1  
FROM B1 / D1 USE TO USE CLASS C3, COMPRISING THREE RESIDENTIAL UNITS INCLUDING AN  
EXTENSION AT ROOF LEVEL, AND RETAINING 120SQ.M OF B1 USE**

**Transport Assessment/Travel Plans**

Revised Deposit Draft 2004 Policy T1 Sustainable Transport requires transport assessments and travel plans to be provided in support of development that significantly increases travel demand.

- The proposed scheme is below the gross floorspace threshold for requiring a Transport Impact Assessment.
- As the site is well located within Central London and that as there is no on-site parking, there is no requirement to provide a Green Travel Plan (ref. Policy TR3).

**4.5 Policies for Security**

Revised UDP Deposit Draft 2004: Policy SD1 Quality of Life -(D) - Community Safety requires development to incorporate design, layout and access measures which address personal safety, including fear of crime, security and crime prevention.

Special Planning Guidance 2002 (SPG2002) Section 3.2 Community Safety gives clear guidelines on how to plan for community safety by:

- a. encouraging greater surveillance of the public realm by promoting frontages, informal surveillance and monitored, electronic surveillance; and
- c. develop site layouts on all development sites to take account of personal safety.

(SPG2002) New Developments Para 3.2.17 recommends front boundary treatments should be no higher than 1m and that set backs should be avoided. Hard and soft landscaping should be carefully used so as to provide clear surveillance and to define public and private space and to provide a buffer zone between pedestrian routes and ground floor windows, preferably a distance sufficient for privacy and security without compromising surveillance potential.

The proposed scheme has taken account of and conforms with the above guidance:

**Electronic surveillance and security bars**

As described above, planning permission already exists for a CCTV camera to be installed above, and covering, the eastern elevation of No.26 Argyle Square. As already described, steel grills will be fitted to the outside window openings.

**Landscaping**

The planter boxes to be positioned along the eastern boundary of the site will demarcate the "public" from the "private" realm and also provide a buffer zone. They will also help afford privacy to the residents of the proposed residential properties.



**EXPLANATORY STATEMENT IN SUPPORT OF A FULL PLANNING APPLICATION FOR THE  
CONVERSION AND CHANGE OF USE OF THE REAR OF NO.26 ARGYLE SQUARE, LONDON WC1  
FROM B1 / D1 USE TO USE CLASS C3, COMPRISING THREE RESIDENTIAL UNITS INCLUDING AN  
EXTENSION AT ROOF LEVEL, AND RETAINING 120SQ.M OF B1 USE**

**4.6 Policies for Private Amenity**

Revised Deposit Draft 2004 - Policy H8 - Mix of Units Para.2.61 requires residential units for families to have access to gardens or public space within 400 metres.

As stated in 4.2 above, the property is only 40m from Argyle Square public garden which offers a range of passive recreational areas and active children's play area. The occupiers of Units 1 and 2 will be able to access this facility easily. In addition, Unit 3 has its own private patio and terrace. Therefore the proposal conforms to the Council's the amenity criteria.