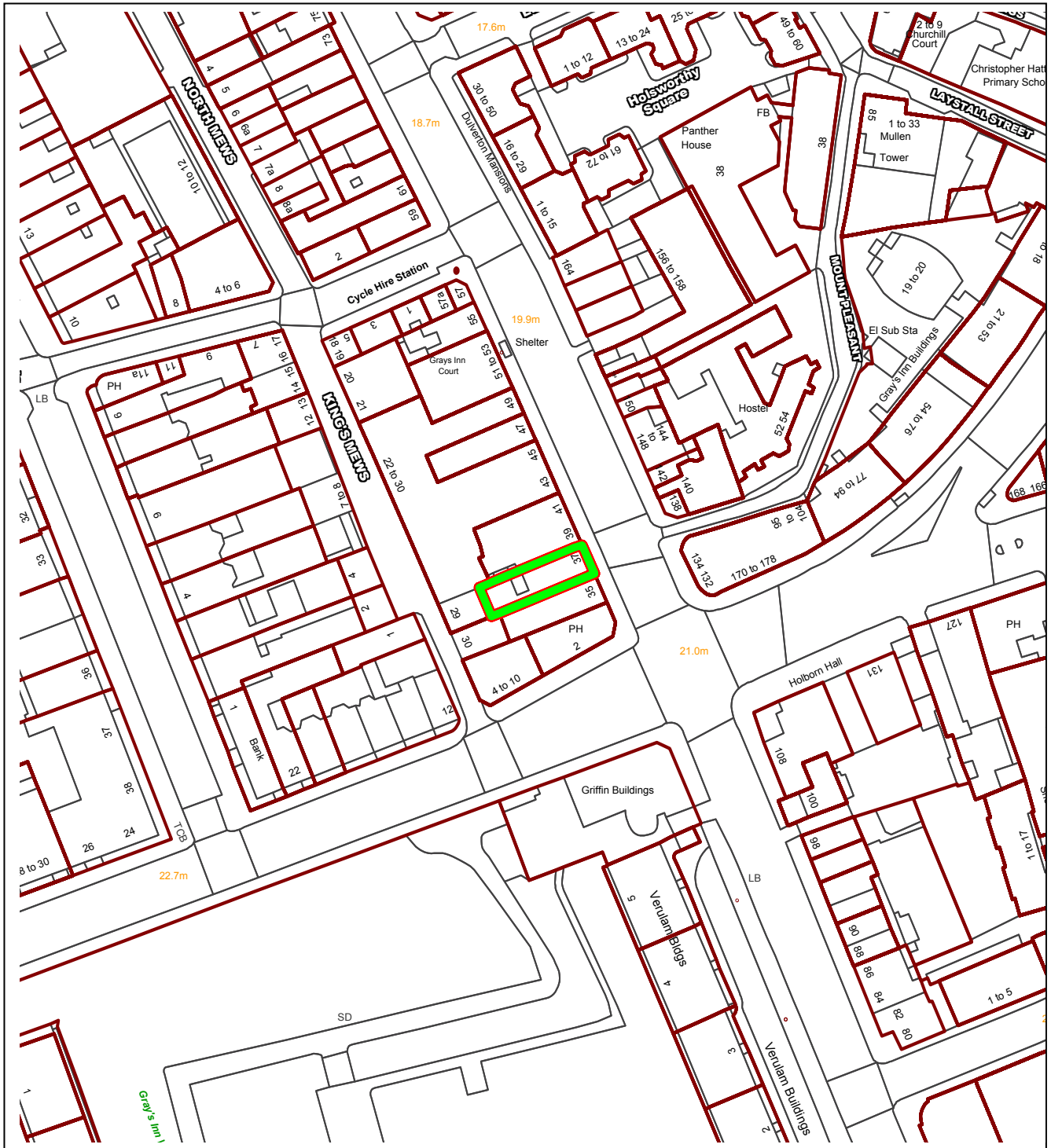


# 37 Gray's Inn Road (2014/3356/P)



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Gray's Inn Road elevation - application site



Gray's Inn Road elevation – prior to work starting on adjacent sites



Gray's Inn Road elevation – works underway on adjacent site



Gray's Inn Road elevation showing approvals at adjacent sites.



Application site – 3<sup>rd</sup> floor extension and roof behind brick feature

Rear elevation





3<sup>rd</sup> floor building line to be extended  
(mansard proposed on top)

Properties to rear at Kings Mews



Properties to rear at Kings Mews (viewed from 41 Gray's Inn Road)

<b>Delegated Report</b>		<b>Analysis sheet</b>		<b>Expiry Date:</b>		08/08/2014	
<b>(Members Briefing)</b>		N/A / attached		<b>Consultation Expiry Date:</b>		17/07/2014	
<b>Officer</b>				<b>Application Number(s)</b>			
Amanda Peck				2014/3356/P			
<b>Application Address</b>				<b>Drawing Numbers</b>			
37 Gray's Inn Road London WC1X 8PP				Refer to draft decision notice			
<b>PO 3/4</b>		<b>Area Team Signature</b>		<b>C&amp;UD</b>		<b>Authorised Officer Signature</b>	
<b>Proposal(s)</b>							
Erection of 4th floor mansard roof extension with terrace and 3rd floor rear extension, following change of use of 1st, 2nd and 3rd floors from offices (Class B1) to 2 x 1 bed flats and 1 x 3 bed maisonette (Class C3).							
<b>Recommendation(s):</b>		Grant Planning Permission					
<b>Application Type:</b>		Full Planning Permission					
<b>Conditions or Reasons for Refusal:</b>		Refer to Draft Decision Notice					
<b>Informatives:</b>							
<b>Consultations</b>							
<b>Adjoining Occupiers:</b>		No. notified	43	No. of responses	03	No. of objections	03
				No. electronic	00		
<b>Summary of consultation responses:</b>		<p>Site Notice displayed between 20/06/13 and 11/07/13 Press Notice published (Ham &amp; High) between 26/06/13 and 17/07/13</p> <p>Objections were received from 11 and 13 Tiverton Mansions (140 Gray's Inn Road) and 35 Gray's Inn Road (on behalf of commercial unit and 4 residential flats), as follows:</p> <ul style="list-style-type: none"> <li>• It will create a loss of privacy as the occupants of the 4th floor will be able to overlook my home. <b>Officer comment:</b> Please see paragraphs 8.4 and 8.4.</li> <li>• It will also create a loss of daylight and sunlight. This is compounded by the loss of sunlight suffered from the proposed new buildings which have been approved at 39 onwards. <b>Officer comment:</b> Please see paragraph 8.5.</li> <li>• No effort has been made to study the impact of this development on local historic buildings in the immediate area. Building work will undoubtedly cause tremors, resonance and sustained vibrations which will affect nearby 150 year old buildings. <b>Officer comment:</b> The construction impact on buildings is not a planning matter.</li> <li>• No provisions have been made for the social impact of this development e.g. disposal of rubbish. Currently, walking along the pavements of Gray's Inn Road is already a challenge given the number of refuse sacks. <b>Officer comment:</b> Please see paragraph 6.4.</li> <li>• Only recently was planning permission granted for 39-45 Gray's Inn Road and</li> </ul>					

	<p>the construction is impacting negatively on both residents and businesses within the immediate area (loss of business, damage to buildings, restaurant unable to open during day, excessive noise, vibration from heavy machinery, dust and dirt, litter). <b>Officer comment:</b> An informative is included regarding the allowed hours of construction, other issues are covered by Environmental Health legislation.</p> <ul style="list-style-type: none"> <li>• There have been occasions in the past where planning permission which has been granted by the council but the conditions contained within the permission have not been enforced (Yorkshire Grey works and excessive noise and vibration) <b>Officer comment:</b> The enforcement team will deal with any future breaches of condition.</li> <li>• The proposed development and works will escalate already existing traffic and parking problems. <b>Officer comment:</b> Please see paragraph 7.1.</li> </ul>
<b>CAAC/Local groups comments:</b>	<p><u>Bloomsbury CAAC</u> – We consider this proposal inappropriate as damaging to the historic fabric and overscaled, also the glass privacy screen is inappropriate to the historic context.</p> <p><b>Officer comment:</b> See sections 2 and 3. The glass privacy screen has been removed from the scheme.</p>

## Site Description

The property is a four storey plus basement mixed use building that forms part of a terrace that runs from Theobalds Road to Northington Street. The property is in use as a language school at basement level (Class D1), retail shop at ground floor level (Class A1), with office use on upper floors (Class B1a). The building is not listed, but is situated within the Bloomsbury Conservation Area.

## Relevant History

### Application site

- 2013/2634/P Change of use of existing 1st, 2nd & 3rd floor offices (B1a) to create 3x self contained flats (2x 2 Bedroom and 1x 1 Bedroom) (C3). Granted 26 July 2013
- N15/7/2/30664 – Certificate granted on 28<sup>th</sup> January 1981 for lawful use of the first, second and third floors as offices.

### 39-45 Gray's Inn Road

2013/3231/P - Redevelopment to provide 16 residential units (12 x 2 bedroom, 3 x 1 bedroom and 1 x studio) and 545sqm of ground floor and basement retail space (2 x Class A1 units), following partial demolition at Nos. 39 and 45 and full demolition at Nos. 41 and 43 Gray's Inn Road. Granted 6 November 2013

### 39-41 Gray's Inn Road

- 2012/1670/P and 2012/3547/C - Erection of a fourth floor mansard extension to create 2 x two bedroom self contained flats (Class C3); erection of a 3 storey rear extension from first to fourth floor level to convert 4 x one bedroom and 1 x three bedroom self contained flats into 6 x two bedroom self contained flats (Class C3) and associated alterations to front elevation. Granted 1 November 2012.
- 2009/0710/P and 2009/0711/C (13/05/2009) – PP and CC Granted for the redevelopment of the site following the demolition of the existing 2 and 3 storey storage buildings at 23-30 Kings Mews including the erection of a new part 3, part 4 storey building to accommodate 18 private residential flats (10 x 1 bed, 5 x 2 bed, 3 x 3 bed), and erection of rear extension at first to third floor levels and mansard roof extension at fourth floor level at 43-45 Gray's Inn Road and provision of a new shopfront associated with the retained retail use at ground and basement floor levels, and change of use of the upper floors from part offices and part residential to a wholly residential use to accommodate 7 affordable flats (3 x 1 bed, 3 x 2 bed, 1 x 4 bed). This permission has now expired and cannot therefore be implemented.

### 43 Gray's Inn Road:

2011/6278/P (08/02/2012) – PP Granted for the change of use from office (Class B1) to residential (Class C3) at first, second and third floor level to create 4 x two bedroom self contained flats and associated works including the addition of a fourth floor level and the erection of a four storey rear extension from first to fourth floor level.

### 45 Gray's Inn Road:

2011/5576/P (24/02/2012) - PP Granted for the erection of 4th floor mansard roof extension to provide a 2 bedroom self-contained flat, and erection of rear extension at third floor level to extend the existing 1 bedroom flat into a 2 bedroom flat (Class C3).

### **29-30 King's Mews (various approvals on kings mews, this is the property directly to the rear)**

Erection of new façade and second and third storeys following partial demolition of existing building in association with the change of use from warehouse/office at ground and first floors (Class B1/B8) and flat on second floor (Class C3) to 2 x studio flats at ground floor and 1 x 3 bedroom maisonette at 1st, 2nd & 3rd floors (Class C3). Granted 18 July 2013.

### **Relevant policies**

#### **LDF Core Strategy and Development Policies**

CS1 - Managing the distribution of growth  
CS5 – Managing the impact of growth and development  
CS6 - Providing quality homes  
CS11 – Promoting sustainable and efficient travel  
CS13 –Tackling climate change through promoting higher environmental standards  
CS14 – Promoting high quality places and conserving our heritage  
CS19 – Delivering and monitoring the Core Strategy  
DP2 - Making full use of Camden's capacity for housing  
DP5 - Homes of different sizes  
DP6 - Lifetimes homes and wheelchair housing  
DP16 – The transport implications of development  
DP17 – Walking, cycling and public transport  
DP18 – Parking standards and limiting the availability of car parking  
DP22 – Promoting sustainable design and construction  
DP24 – Securing high quality design  
DP25 – Conserving Camden's heritage  
DP26 – Managing the impact of development on occupiers and neighbours

#### **Camden Planning Guidance**

CPG1 (Design)  
CPG2 (Housing)  
CPG5 (Town Centres, Retail and Employment)  
CPG6 (Amenity)  
CPG7 (Transport)

#### **Bloomsbury Conservation Area Statement (1999)**

**London Plan, 2011**

**NPPF, 2012**

### **Assessment**

#### **1. Proposal and background**

1.1 The proposal is for the erection of a mansard roof extension and a small extension at 3<sup>rd</sup> floor level to the rear (effectively to align the third floor with the floors below as it is currently set back). Permission has already been granted for the change of use of the first, second and third floors from office to residential and this application changes the layout of the first and second floors and creates a maisonette at third and fourth floor levels.

1.2. The scheme originally included 1 bed units at first and second floor levels and has been revised to retain the 2 bed units as previously approved. The roof terrace/window design of the roof extension to the rear elevation has also been amended to reduce the size of the windows in the roof slope and remove the glass privacy screen.

#### **2. Partial demolition of the existing building**

2.1. Demolition is proposed in the sense that the existing roof structure and part of the rear elevation at third floor level are to be removed from the building. An assessment of the rear elevation shows that the third floor level and roof appears to be a later addition, with a timber façade to the rear and different fenestration to the front elevation. Whilst the rear elevation modestly adds to the main significance of the building, the building's primary contribution to the conservation area lies in the front elevation, which sits within an informal composition of terrace house type properties.

2.2 The Bloomsbury Conservation Area is the designated heritage asset. In such a large area different elements of the designated heritage asset will have varying levels of significance and in this case, it is



considered the significance of the rear of the property is of limited value and therefore less weight should be given to its conservation (as opposed to the front elevation).

2.3 There are extremely limited views of the rear of the building with the site being screened by the properties on King's Mews, which could increase in height as a result of recent approvals. The rear elevations of No 37 sits between the much bulkier buildings at No.35 Gray's Inn Road and the properties to the north at Nos.41-53 Gray's Inn Road, which all combine together to form the predominant character and appearance of this part of Bloomsbury Conservation Area.

2.4 Paragraph 134 of the NNPF then goes on to state that:

*"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefit of the proposal, including securing its optimum viable use."*

2.5. Given that the removal of third floor element of the rear elevation would result in the loss of only a small level of significance of the conservation area, and taken with the benefit of infilling the 'gap' at roof level, it is considered appropriate.

### **3. Design**

3.1. Gray's Inn Road is a wide, busy route linking High Holborn in the south to King's Cross in the north. It has a more varied character than the quieter side streets with a coarser grain where piecemeal development has occurred over the 19th and 20th centuries, characterised today by a mix of commercial, community and hospital uses. The architectural detailing has remained consistent, with a strong vertical definition of window patterns and building heights.

3.2. In terms of local character, the principle of a roof extension has been established within the terrace, whereby 10 out of 11 buildings feature or have planning permission for mansards, namely 39, 41, 43, 45, 47, 49, 51,53 and 57. As a result, the remaining buildings along the terrace without a mansard or extant permission would be 37 and 55.

3.3. In terms of detailed design, the proposed mansard extension follows guidance forming part CPG1 (design) (with a flat top mansard and a lower slope of 70 degree, mansard behind and recessed from the parapet). To the front elevation two windows are proposed which align with the windows at third floor level and are of a similar size, to the rear elevation an inset balcony/terrace is proposed with sliding doors. The design to the rear has been amended to remove the originally proposed privacy screen, to set the balcony/terrace into the roof slope and reduce the size of the sliding doors. The proposed mansard is considered acceptable in terms of its design in this context.

3.4. The third floor extension is considered acceptable given the small size of the extension, the fact that it aligns with the lower floors and simplifies the rear elevation. The elevational treatment and fenestration detail of timber sash windows is considered sympathetic to the character of the building and CPG1 (design).

### **4. The principle of residential use**

4.1 The loss of the office use and change to residential use has already been considered acceptable in the previous permission (2013/2634/P), granted 26 July 2013. There have been no policy or context changes since then and the change of use is considered acceptable.

4.2 Policies CS6 and DP2 seek to maximise the supply of housing in the Borough and identify housing as the 'priority land-use' of the Local Development Framework. The area surrounding the site is characterised by a mix of business, residential and retail uses. The introduction of new residential accommodation at third floor level would contribute towards creating mixed and balanced communities and is considered acceptable in principle in this location.

### **5. Residential Mix**

5.1. Policy DP5 requires new residential development to consist of homes of a range of sizes and sets out the priority dwelling sizes needed in the Borough. 2 bed market units are considered a 'very high' priority and for this reason the Council aims for 40% of units in new residential developments to be 2 bed units. The approved scheme included 2 x 2 bed units and 1 x 1 bed unit (exceeding the 40% aim for 2 bed market units) and the proposal is now to increase the residential floorspace with the proposed roof extension and create 2 x 2 bed flats and 1 x 3 bed maisonette (Class C3) contributing towards meeting the Council's priority housing needs. This complies with policy DP5.

## **6. Standard of residential accommodation**

6.1. Policies CS5, CS6, CS14, DP6 and DP26 require new residential development to be well designed in terms of its internal arrangement, size, and the quality accommodation provided. CPG2 (Housing) sets the minimum standards for new residential accommodation and conversions.

6.2. The layout to the 2 bed units has changed slightly since the previous permission, but at approximately 61.9sqm they still meet with the overall minimum size standards for 2 bed (3 person) units (minimum 61sqm). The principal and second bedrooms, at 11.7 and 8.1sqm respectively, exceed the minimum size standards for bedrooms. The proposed 3 bed unit at 97sqm exceeds the minimum size standards for a 3 bed (6 person) unit (minimum 93sqm) and the bedroom also exceed the Council's minimum standards.

6.3. CPG2 requires some amenity space be provided in all new dwellings. The proposal includes a small balcony for the top floor maisonette and no other amenity space. Owing to the constraints of the site this is considered acceptable in this instance.

6.4. All of the habitable rooms are served by comparatively large windows and would appear to receive adequate daylight. An area of internal floorspace has also been allotted for the storage of waste and recyclable materials, and the design and access statement explains that this would be taken down for street side collection on appropriate days. Given the constraints of the site, this is considered acceptable.

6.5. Policy DP6 requires that all new housing development meet Lifetime Homes standards. A Lifetime Homes Statement has been submitted with the application, and this demonstrates that 7 of the 16 of the criteria can be met, with a further three partially met (No. 5a – communal stairs, No. 14 - accessible bathrooms for each unit and No. 15 - glazing and window handle heights). Of the remaining six criteria, criteria 1 and 2 (parking and access from parking spaces) cannot be met due to constraints of the site, criterion 3 (approach to all entrances) can only apply to the main entrance door; criterion 5(b) (Communal lift) is not practicable; criterion 9 (potential for entrance level bed-space) is not practicable. On this basis, given the constraints of the site and surrounding area, it is considered that the statement sufficiently justifies why not all lifetime homes criteria can be met, and is therefore acceptable in this regard.

## **7. Car and cycle parking**

7.1. The application does not propose any car parking for the proposed residential accommodation. This accords with the Council's maximum residential parking standards and policy DP18 which seeks to deter unnecessary car use in highly accessible locations and promote the use of more sustainable modes of transport. The Council's Highways department has stated that the applicant must enter into a S106 legal agreement to secure a car-free development in perpetuity. The agreement prohibits the provision of off-street parking within the curtilage of the site, and removes the ability of any future occupants to obtain a parking permit for the area from the Council. The applicant has confirmed that this is acceptable.

7.2. The proposals fail to provide any cycle parking spaces. Policy DP18 requires that 1 secure, covered cycle parking space should be provided for each new residential unit however, given that the application is for a change of use and there are to be no alterations to the landscaping, it is clear that there are site constraints which do not allow for the provision of a cycle store on this occasion.

## **8. Residential amenity**

8.1. Policies CS5 and DP26 seek to preserve the amenity of the Borough's residents from the harmful consequences of new development. This includes from overlooking, overshadowing, noise, fumes and general disturbance.

8.2 The nearest residential premises to the application site are located directly to the rear on King's Mews and on the upper floors of adjoining properties. Permission has been granted at 29-30 King's Mews for change of use and extensions to accommodate residential units. To the rear of the application site the following windows are located at 29 Kings Mew's (as proposed, with existing in brackets):

- Ground floor window serving the bedroom area of a ground floor studio flat located in 30 King's Mews. (garage with no windows to rear as existing);
- First floor window serving a bedroom suite to a 3 storey maisonette located on the first, second, third floors of 29 and 30 Kings Mews (no windows to rear as existing);
- Second floor window serving an open plan living room to the same maisonette (with window screens) (bedroom and living room windows and roof terrace to residential flat located in 29 and 30 King's Mews as existing); and

- Third floor window serving a bedroom (with window screens) and one without screens serving a bathroom (no third floor as existing).

8.3. The rear windows of the proposed residential floorspace to the roof extension would face the rear windows to properties in King's Mews; however, it is considered that although the distance between the two buildings is approximately 13m, there should not be a material overlooking issue because:

- The units at 29-30 King's Mews (as approved and as existing) are dual aspect units with some screening to the rear elevation windows;
- Views to the permitted ground floor studio unit are obscured by the existing raised roof lantern to the ground floor extension at 37 Gray's Inn Road; and
- There is permission already for residential uses at the lower floors of the application site.

8.4 The properties on the other side of Gray's Inn Road are approximately 18m away on the opposite side of a busy road, with existing residential windows on either side of this road and it is therefore considered that there will be no overlooking issues in this regard.

8.5 The windows to the rear of King's Mews are already surrounded by taller buildings to the east and south on Gray's Inn Road and Theobald's Road and therefore there is unlikely to be any impact on daylight or sunlight levels to these existing or approved units.

8.6. The proposals are not considered to be liable to cause any noise or disturbance to neighbouring residential properties that could be said to be harmful to amenity. The proposals therefore comply with policies CS5 and DP26.

## **9. Sustainability**

9.1. Policies CS13 and DP22 require new development to incorporate sustainable design and construction methods in order to mitigate and adapt to climate change. The applicant's design and access statement states that measures to be incorporated include:

- Mechanical heat recovery ventilation system from bathroom and kitchen extracts;
- Condensing boilers for space and water heating;
- Restricted flow showers and aerating taps;
- Dual flush WCs;
- Energy saving LED lighting installations; and
- Low energy and water use appliances.

9.2. Given the constraints of the site and that this is largely a conversion rather than complete re-development scheme, it is considered that these are reasonable steps to make to ensure the aims of policies are CS13 and DP22 are broadly met.

## **10. Community Infrastructure Levy**

As the proposals involve the creation of new residential units, they are liable for contributions towards the Mayor of London's Community Infrastructure Levy, however, as the units created at 1<sup>st</sup> and 2<sup>nd</sup> floor levels are a conversion they would not be CIL liable and only the additional roof top unit would be.

**Conclusion: Grant conditional permission**

### **DISCLAIMER**

**Decision route to be decided by nominated members on Monday 6<sup>th</sup> October 2014. For further information please go to [www.camden.gov.uk](http://www.camden.gov.uk) and search for 'members briefing'**

David Corley Architect  
6 Woodford Mill  
Mill Street  
Witney  
Oxon  
OX28 6DEApplication Ref: **2014/3356/P**

30 September 2014

Dear Sir/Madam

**DRAFT**  
**FOR INFORMATION ONLY - THIS IS NOT A FORMAL DECISION**  
Town and Country Planning Act 1990 (as amended)**DECISION SUBJECT TO A SECTION 106 LEGAL AGREEMENT**

Address:

**37 Gray's Inn Road  
London  
WC1X 8PP**

Proposal:

Erection of 4th floor mansard roof extension with terrace and 3rd floor rear extension, following change of use of 1st, 2nd and 3rd floors from offices (Class B1) to 2 x 1 bed flats and 1 x 3 bed maisonette (Class C3).

Drawing Nos: Site location plan; 130547 FP; 775/S1; 775/S2; 775/S3; 775/S4; 775/S5; 775/P06; 775/P07A; 775/P01A; 775/P02A; 775/P03; 775/P04A; 775/P08A; 775/P05A; Design and Access Statement, April 2014, DC/dc/775.10; Marketing Statement, June 2014, DC/dc/775.13; Lifetimes Home Statement, June 2014, DC/dc/775/14.

The Council has considered your application and decided to grant permission subject to the conditions and informatives (if applicable) listed below **AND** subject to the successful conclusion of a Section 106 Legal Agreement.

The matter has been referred to the Council's Legal Department and you will be contacted shortly. If you wish to discuss the matter please contact **Aidan Brookes** in the Legal Department on **020 7 974 1947**.

Once the Legal Agreement has been concluded, the formal decision letter will be sent to you.

Condition(s) and Reason(s):

- 1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 [and DP25 if in CA] of the London Borough of Camden Local Development Framework Development Policies.

- 3 The development hereby permitted shall be carried out in accordance with the following approved plans: Site location plan; 130547 FP; 775/S1; 775/S2; 775/S3; 775/S4; 775/S5; 775/P06; 775/P07A; 775/P01A; 775/P02A; 775/P03; 775/P04A; 775/P08A; 775/P05A; Design and Access Statement, April 2014, DC/dc/775.10; Marketing Statement, June 2014, DC/dc/775.13; Lifetimes Home Statement, June 2014, DC/dc/775/14.

Reason: For the avoidance of doubt and in the interest of proper planning.

#### Informative(s):

- 1 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts which cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Argyle Street WC1H 8EQ, (tel: 020-7974 6941).
- 2 Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Compliance and Enforcement team [Regulatory Services], Camden Town Hall, Argyle Street, WC1H 8EQ (Tel. No. 020 7974 4444 or on the website <http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-the-environmental-health-team.en> or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.
- 3 The Mayor of London introduced a Community Infrastructure Levy (CIL) to help pay for Crossrail on 1st April 2012. Any permission granted after this time which adds more than 100sqm of new floorspace or a new dwelling will need to pay this CIL. It will be collected by Camden on behalf of the Mayor of London. Camden will be sending out liability notices setting out how much CIL will need to be paid if an

affected planning application is implemented and who will be liable.

The proposed charge in Camden will be £50 per sqm on all uses except affordable housing, education, healthcare, and development by charities for their charitable purposes. You will be expected to advise us when planning permissions are implemented. Please use the forms at the link below to advise who will be paying the CIL and when the development is to commence. You can also access forms to allow you to provide us with more information which can be taken into account in your CIL calculation and to apply for relief from CIL.

<http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil>

We will then issue a CIL demand notice setting out what monies needs to paid when and how to pay. Failure to notify Camden of the commencement of development will result in a surcharge of £2500 or 20% being added to the CIL payment. Other surcharges may also apply for failure to assume liability and late payment. Payments will also be subject to indexation in line with the construction costs index.

Please send CIL related documents or correspondence to [CIL@Camden.gov.uk](mailto:CIL@Camden.gov.uk)

- 4 Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraphs 186 and 187 of the National Planning Policy Framework.

Yours faithfully

Culture and Environment Directorate