



TOWN PLANNING STATEMENT

DIORAMA, 17-19 PARK SQUARE EAST, LONDON

For

THE CROWN ESTATE

NOVEMBER 2014

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1.0 INTRODUCTION

1.1 This statement is written on behalf of The Crown Estate in support of a full planning application and listed building consent application for the Diorama, 17-19 Park Square East. The site is located within the London Borough of Camden.

1.2 The proposal involves the conversion of the Grade I listed building into 8 residential units, comprising 6 apartments and 2 townhouses, incorporating a new roof extension. The description of development is as follows:

“Change of use of existing B1 floorspace into 8 residential dwellings comprising 6 apartments and 2 townhouses comprising internal alterations to the Grade I listed building. Works include internal reconfiguration, extension of the existing lightwell, new roof extension, ancillary landscaping, refuse and cycle storage and sub-station”.

1.3 The design process has been informed by consultation with officers of the London Borough of Camden (‘LBC’). The current proposal represents a conservation-led scheme to create high quality residential uses with minimal impact on the setting and architectural interest of the listed building.

1.4 The planning application is accompanied by:-

- Application drawings prepared by Hub Architects;
- Design and Access Statement prepared by Hub Architects;
- Archaeology Report prepared by MOLA;
- Construction Management Plan prepared by GTMS;
- Sustainability Report prepared by Mecserve;
- Acoustic Report prepared by Cole Jarman;
- Transport Assessment prepared by Atkins;
- Affordable Housing Statement prepared by JLL;
- Daylight/Sunlight Report prepared by CHP Surveyors;
- Heritage Statement prepared by Donald Insall Associates;
- Structural Report prepared by Waterman;

- Marketing Report prepared by CBRE; and
- Diorama – A series of proposals to record and promote the building's history prepared by Smart Soho.

2.0 THE SITE AND ITS SURROUNDINGS

- 2.1 The application site is located mid-terrace along Park Square East overlooking Regents Park, north of Park Crescent. The site extends into Peto Place to rear of Park Square East. Primary access is from Park Square East and there is a secondary access into the building from Peto Place.
- 2.2 The building is Grade I listed (see Appendix A for listing details) and falls within the Regents Park Conservation Area. The site is currently in B1 office use, restricted by planning condition to charities and institutions.
- 2.3 The site is highly accessible by public transport and has a PTAL rating of 6b. The site is located approximately 150m north of Great Portland Street Underground Station and within 600m of Regents Park and Warren Street Underground Stations. The site is well served by buses along Euston Road.

Surrounding Area

- 2.4 The application site sits within a terrace encompassing 13 to 24 Park Square East. The terrace is in predominantly residential use. Residential and office uses are located within Peto Place including ‘Which’ and The Royal College of Physicians. Peto Place is primarily used for servicing these office developments.

Planning History

- 2.5 The planning history for the site below indicates the extensive changes and alterations including changes of use to the building over the years. In particular, the change of use of the site in its entirety to residential was approved in 1984 and renewed in 1989.

Application Number	Site Address	Development Description	Date Registered	Decision
<u>9401950</u>	The Diorama 18 Park Square East NW1	Use of the building for institutional purposes as shown on site plan and as revised by letter dated 18 April 1995.	20-12-1994	Granted
9003521	17 19 and 24 Park Square East	Change of use from residential to offices within Class B1 of the Town	19-11-1990	Granted

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	1-3 Albany Terrace NW1	and Country Planning (Use Classes) Order 1987.		
8970518	17-19 Park Square East NW1	Renewal of listed building consent dated 20.08.84. granted on appeal by the Department of the Environment for the partial demolition reconstruction and alteration of nos 17 and 19 park Square East in accordance with drawing nos PSE/D/001-002.	10-10-1989	Granted
8903492	17-19 Park Square East NW1	Renewal of planning permission dated 20.08.84 granted on appeal by the Department of the Environment for the use of nos 17 and 19 Park Square East for residential purposes.	28-07-1989	Granted
8670008	Diorama 17-19 Park Square East and Peto Place	Internal and external alterations as shown on drawing nos.7662/200-216. Appeal received against the Council's failure to issue their decision within an appropriate period	08-01-1986	Appeal dismissed
8670007	Diorama 17-19 Park Square East and Peto Place	Internal and external alterations as shown on drawing nos.7662/100-105 106A 107C 108B 109B 110B 111B 112C 113B 114A 116B 118A and 123 and as revised on 17th and 30th June 1986. Appeal received against the Council's failure to issue their decision within an appropriate period	08-01-1986	Appeal dismissed
8600032	Diorama 17-19 Park Square East and Peto Place	Change of use including works of conversion to twenty self-contained flats and maisonettes with associated car parking and a health and fitness club as shown on drawing nos.7662/200-216. Appeal received against the Council's failure to issue their decision within an appropriate period	08-01-1986	Appeal dismissed
8600031	Diorama 17-19 Park Square East and Peto Place	The change of use including works of conversion to twenty self-contained flats and maisonettes with associated car parking and an exhibition gallery as shown on drawing nos.7662/100-105 106A 107C 108B 109B 110B 111B 112C 113B 114A 116B 118A and 123 and as revised on 17th and 30th June 1986. Appeal received against the Council's failure to issue their decision within an appropriate period	08-01-1986	Appeal dismissed
<u>8670158</u>	The Diorama 18 Park Square East and Peto Place NW1	Alterations in connection with the continued use of the building as a centre for entertainment and the arts with associated activities and provision of a museum of the Diorama and Panorama including the erection of a	30-04-1986	Grant List.Build. or Cons.Area Consent

		roof extension and the demolition of outbuildings as shown on 8-unnumbered drawings entitled Diorama Arts Project; namely 1:200 scale location plan elevations to Park Square East and Peto Place section a.a and plans of levels 1 2 3 5 (roof plan) and level 4 (as amended by letter dated 11th February 1987) all as amended on 28th July 1986 and 11th February 1987.		
<u>8600747</u>	The Diorama 18 Park Square East and Peto Place NW1	The continued use of the building as a centre for entertainment and the arts with associated activities and the provision of a museum of the Diorama and Panorama; and the alterations including the erection of a roof extension as shown on 8-unnumbered drawings entitled Diorama Arts Project; namely 1:200 scale location plan elevations to Park Square East and Peto Place section a.a and plan levels 1 2 3 5 (roof level) and 4 (as amended by letter dated 11th February 1987) all as revised on 28th July 1986 and 11th February 1987.	30-04-1986	Grant Full or Outline Perm. with Condit.
34705	17-19 Park Square East, London, NW1	Conversion into offices, residential and museum.	10-08-1982	Refused

- 2.6 Pre-application meetings have been held with Development Control, Planning Policy and Conservation and Design Officers at LBC in respect of the site, including a site visit at which English Heritage were also present. Pre-application feedback has been provided by LBC on 7th January 2013, 15 May 2013 and 19 August 2014.
- 2.7 Initial feedback (January 2013) from Officers in relation to the proposals considered that the main issues were the impact of the listed building including the proposed use and privatisation of space, the provision of affordable housing, the car park proposed at basement level and the internal aspects of the scheme. Further pre-application feedback focused on the land use position (May 2013). Officers noted that the proposed change of use to residential would need to be robustly justified and mitigation measures provided.
- 2.8 Feedback provided in August 2014 primarily focused on the affordable housing provision and the Council outlined their preferred approach in terms of offering this. This was set

out as a three stage process. The Council's preferred option would be for affordable housing to be provided on-site.

2.9 Meetings have also been held with adjoining tenants and Councillors.

2.10 Letters have been sent to all local residents within a distribution zone agreed with LBC to notify residents of the proposals and offer to meet with residents if requested. Three residents responded to the letter, two enquiring as to purchasing a future apartment within the Diorama and one seeking further information on the scheme, particularly the sub-station and cycle store. The applicant met with the latter on 24 July 2013.

3.0 THE DEVELOPMENT PROPOSALS

3.1 The proposed development has evolved in response to feedback received from Officers at LBC. A full description of the proposed development is set out in the accompanying Design and Access Statement prepared by the scheme architects, Hub Architects.

3.2 A comparison of the existing and proposed floor areas (GEA sq m) is given below:-

Land Use	Existing (sq.m.)	Proposed (sq.m.)	Difference (sq.m.)
Class B1 office	3,600	0	-3,600
Class C3 Residential:	0	4,287	+687
TOTAL	3,600	4,287	+687

3.3 The scheme comprises the change of use and redevelopment of 17-19 Park Square East to provide residential accommodation including 6 apartments and 2 townhouses providing a total of 8 new units all of which will be family dwellings. The townhouses will be located at No.17 and No.19 Park Square East with the 6 apartments in the remainder of the building.

3.4 The breakdown of residential unit mix and size is as follows:

Apartment No and Level	No. of bedrooms	Floor Area (sqm GIA)
Apartment 1	3	258
Apartment 2	3	254
Apartment 3	3	240
Apartment 4	3	237
Apartment 5	3	595
Apartment 6	3	483
Town House 1 – No.17	5	439
Town House 2 – No.19	4	398
TOTAL	27	2,904

4.0 PLANNING POLICY ASSESSMENT

- 4.1 National planning policy is set out in the form of the National Planning Policy Framework (‘NPPF’) adopted on 27 March 2012. The NPPF focuses on a presumption in favour of sustainable development. The core planning principles include, amongst others, the requirement to “*drive and support development*”.
- 4.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended), the proposed development must be determined in accordance with the development plan unless material considerations indicate otherwise. The relevant development plan for the site comprises the London Plan (2011), the LBC Core Strategy (2010) and the LBC Development Policies DPD (2010).
- 4.3 Material weight is also given to relevant LBC Supplementary Planning Documents (‘SPDs’). The site falls within the Regents Park Conservation Area for which Regent’s Park Conservation Area Appraisal and Management Strategy is also applicable.
- 4.4 The proposals are considered against relevant policy and guidance in respect of the following headings:-
- Principle of Redevelopment
 - Loss of B1 Offices
 - Affordable Housing
 - Heritage, Conservation and Design
 - Sustainability
 - Transport
 - Residential Amenity

Principle of Redevelopment

- 4.5 The NPPF promotes a presumption in favour of sustainable development. This is seen as a ‘golden thread’ running through the decision making process. In particular, the core planning principles seek to ‘drive and support sustainable economic development to deliver the homes that the country needs’ whilst ‘encouraging the effective use of land by

reusing land that has been previously developed’. At a regional policy level, the London Plan supports this through promoting sustainable development in the Central Activities Zone (‘CAZ’). Core Strategy Policy CS1 seeks to make the best use of Camden’s limited land.

- 4.6 The principle of development in redeveloping the application site accords with the underlying principles of the above documents through:
- Redeveloping previously developed brownfield land;
 - Providing high quality homes whilst reflecting local demand in providing family accommodation;
 - Optimising the development potential of the site whilst respecting and enhancing the setting and character of the listed building and the conservation area; and
 - Ensuring that a vacant Grade I listed property remains in viable use.

Loss of B1 Offices

- 4.7 The pressing need for more homes within London is a major theme within the London Plan. In particular, high density residential development within the Inner London boroughs is encouraged. Policy CS1 of the Core Strategy relates to distribution of growth within LBC and states that the Council will focus on growth in suitable locations to deliver ‘opportunities and benefits and achieve sustainable development’. This approach also expects a significant number of homes to be provided in LBC. In making effective use of land the Council promotes the full use of its sites.
- 4.8 It is duly noted that Policy CS8 of the Core Strategy and Policy DP13 of the Development Policies DPD seeks to protect existing employment space and it is recognised that LBC raised concern over the loss of this type of office use. In support of this application, a detailed marketing report conducted by CBRE justifies the loss of B1 office space at this location. Having considered a variety of office refurbishment options the report concludes that the results of their analyses showed that the level of rent obtainable in this location fails completely to justify the capital investment. The predicted office rental income from the building would not exceed £97.50 psf per annum necessary to produce greater than a 14.9% profit on cost level of return. This figure was regarded a ‘beyond all reasonable and

realistic expectations’.

- 4.9 The proposals seek to provide 8 new residential units comprising 6x three bed, 1x four bed and 1x five bed. Policy DP2 of the Development Policies DPD seeks to maximise the supply of additional homes within the borough. The proposals therefore go some way in meeting LBC’s aims in creating more homes and maximizing the appropriate contribution to housing on the application site.
- 4.10 Policy DP5 of the Development Policies DPD seeks a range of unit sizes in all developments. The proposed scheme therefore accords with DP5 as a mix of family accommodation is proposed ranging from 3 bed to 5 bed units.
- 4.11 As the proposals are for 8 new residential dwellings, the scheme is not required to provide 10% wheelchair accessible units as this applies to developments of 10 or more dwellings. Additionally, the design and fabric of the listed building does constrain the potential for designing for wheelchair accessibility, in particular, at the pre-existing step entrances which are considered to be of high significance to the character of the listed building.
- 4.12 Notwithstanding the above, potential provision for a wheelchair accessible unit has been indicated within the Design and Access Statement (page. 37) which demonstrates that Apartment 1 could be adapted to allow for wheelchair use.

Affordable Housing

- 4.13 Policy CS6 of the Core Strategy and Policy DP3 of the Development Policies DPD relate to the provision of affordable housing. The Council have a target of ensuring that 50% of the borough-wide target for additional self-contained homes is provided as affordable.
- 4.14 An Affordable Housing Statement is submitted in support of this application which has been prepared by JLL. The report concludes that:

“The Council accepts it is not appropriate to accommodate the affordable units on-site in this instance... In accordance with the Council’s cascade test, the options associated with potentially delivering the affordable housing units off-site have subsequently been

carefully considered.

Having comprehensively set out why the affordable housing requirement cannot be delivered either on-site or off-site, TCE proposed to make a payment in-lieu of affordable housing in accordance with stage three of LB Camden's cascade test and strictly adhering to the relevant formula. The proposed payment equates to a total of £4,353,950."

Heritage, Conservation and Design

- 4.15 The building is Grade I listed and lies within the Regents Park Conservation Area. The design of the scheme has carefully considered the impact on the heritage significance, and the character and setting of the listed building, and the character and appearance of the Conservation Area in line with the NPPF and Policy CS14 of the Core Strategy and Policies DP24 and DP25 of the Development Policies DPD. These policies seek the highest standards of design and requires proposals to preserve heritage assets and their settings.
- 4.16 A separate Heritage Building Report prepared by Donald Insall Associates sets out the rationale and justification for the proposals in greater detail, concluding that the proposals to the building's external fabric would be an enhancement of the listed building and the Conservation Area. Significantly, the report states that the restoration of Grade I listed buildings to their optimum viable uses as town houses and apartments would be a major benefit. Overall the benefits outlined within the report are considered to heavily outweigh the minor harms.
- 4.17 In particular, the Heritage Building Report acknowledges that the benefits of the scheme do not have to be visible or accessible in order to be genuine public benefit. Crucially, the building have a secure optimum viable use which will support its long term conservation.
- 4.18 In conclusion, the Report supports the proposed scheme as it is considered that the rebuilding works will lead to a significant enhancement to both the listed building and Conservation Area. Through the external and internal restoration of the buildings, the long term viability of these heritage assets will be secured.

Sustainability

- 4.19 An Energy and Sustainability Report has been prepared by Mecserve and is submitted in support of this application. The Report demonstrates that the scheme can achieve a BREEAM ‘Excellent’ rating and Code for Sustainable Homes Level 4. Overall, the energy efficiency measures will achieve a 38% carbon reduction for the development.
- 4.20 To ensure that this carbon reduction can be reached, the following measures are to be included within the proposed development:
- Improved building fabric beyond the Part L minimum target;
 - Community heating system capability with CHP;
 - PV panels;
 - High efficiency light fittings and controls; and
 - Advanced metering and controls.

Transport

- 4.21 The site has the highest possible PTAL level of 6b. As such, future residents will have access to a variety of transport options and the site is considered appropriate for residential development given this high rating. The Transport Assessment prepared by Atkins which has been submitted in support of this application confirms that no specific mitigation measures are necessary in order to facilitate the development.
- 4.22 As part of the development, it is proposed to provide 10 secure and covered cycle parking spaces. This will be provided to the rear of the building and can therefore be accessed via Peto Place.
- 4.23 The proposals are considered to have a negligible impact upon the existing transport infrastructure and therefore accord with Policy DP18 of the Development Policies DPD.

Residential Amenity

- 4.24 The proposals have been assessed in respect of the impact upon future occupiers and

existing neighbours in accordance with Policy DP26 of the Development Policies DPD as set out below.

Daylight and Sunlight

- 4.25 A Daylight and Sunlight Report has been carried out by CHP and has been submitted in support of this application. The Report demonstrates that daylight enjoyed by the windows of the neighbouring residential properties, in all instances they will either achieve a VSC of greater than 27% or 0.9 times the existing value. All rooms will also enjoy good daylight distribution.
- 4.26 In conclusion, the results of the daylight and sunlight analysis show that the aims of the Daylight and Sunlight good practice guide are met.

Noise

- 4.27 A Noise Assessment prepared by Cole Jarman is submitted in support of this application. The Assessment concludes that the internal noise climate will be provided in line with the relevant criteria. Additionally, condenser units are to be installed to provide air conditioning to the dwellings and the Assessment has been based on the units all operating at once although this will be unlikely. Even if all the units were to be operating at once, the Assessment considers that the plant noise limits will be achieved.

Open Space

- 4.28 The application site is constrained by adjoining properties and therefore this presents limited opportunity for the provision of on-site open space. However, Park Square East fronts directly onto Regents Park and residents will be able to make good use of this public open space. It is not expected that the development will add pressure to this provision of open space.

5.0 CONCLUSIONS

- 5.1 The scheme has been developed in consultation with officers from the London Borough of Camden. It is considered to offer a long term sustainable solution to the site as well as seeking to conserve and enhance the Grade I listed building and Conservation Area. The proposed use of residential dwellings is considered to be acceptable in this location and is supported by the marketing report submitted alongside this application. The proposals therefore comply with the aims of National, Regional and Local Planning Policy.
- 5.2 The proposals will allow for the building to remain in a viable use and ensure that the building continues to positively contribute to the Regents Park Conservation Area whilst providing much needed family accommodation in the Borough.
- 5.3 Overall, it is considered that the proposals will provide high quality accommodation whilst preserving and enhancing the significance and setting of the Grade I listed building and Conservation Area.

APPENDIX A – LISTED BUILDING DETAILS

Numbers 13-24 and attached railings the Diorama, Bedford College Annexe, Peto Place

List entry Number: 1322054

Grade: I

Date first listed: 14-May-1974

Includes: The Diorama, Bedford College Annexe PETO PLACE. Terrace of 12 houses, the northern most bay forming part of No.1 St Andrew's Place (qv). c1823-5. By John Nash. Nos 13-16 and Nos 20-24 converted to flats c1986, many original interior features destroyed. Stucco and slated mansard roofs with dormers. EXTERIOR: symmetrical terrace, 3 bays at either end and centre 7 window bays projecting. Projecting bays 4 storeys, and basements; otherwise, 3 storeys, attics and basements. 3 windows each. Ground floor with attached Ionic order supporting an entablature surmounted by a continuous cast-iron balcony (the northern most projection without railings). Square-headed doorways with architraves, cornices, pilaster-jambes carrying cornice-heads and patterned fanlights (except Nos 16, 19, 21, and 23) and panelled doors. Architraved sash windows with cornices and some glazing bars. 1st floor windows arcaded with keystones, archivolt and moulded imposts. 2nd floor sill band. Dentil cornice at 3rd floor with attic storeys over centre and end bays and balustraded parapets between. INTERIORS: with stone stairs, cast-iron, foliated balusters and wreathed wood handrails. Some panelled rooms; most with enriched ceiling cornices and central roundels. Rear ground floor room of No.24 with good vaulted and moulded ceiling, roundels of Classical figures, pilasters and pedimented mirror over original fireplace.

SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas. No.18 incorporates at the rear, in Peto Place, a 3 storey, altered, polygonal building in brick with stone capped buttresses between round-arched 2nd floor windows. This was the Diorama, a picture show designed by Augustus Charles Pugin. By 1854 it had been converted into a Baptist Chapel which closed 1922 when the Middlesex Hospital used it for a rheumatism treatment pool. An arts co-operative at time of inspection in 1989.