

# **Design and Access Statement Incorporating Heritage**

## **Asset Statement**

### **Proposed Construction of a Fourth-Floor for use as a Two Bedroom Flat at 20, Bloomsbury Street, London, WC1B 3JH**

#### **1.0 The Site and Locality**

**1.1** The site lies within a mixed-use urban area wherein development, including change of use, is acceptable in principle. It is within the Central London Area, the Bloomsbury Conservation Area, and an Archaeological Priority Area all as designated in the Local Development Framework. The character of the locality is that of a highly urban city neighbourhood, with strong residential representation juxtaposed with the commercial and retail uses.

**1.2** The current use of the building is as a Bureau de Change (class A2 under the Use Classes order) on the ground floor, with the first and second floors being in B1 general office use and the third-floor recently permitted and converted for use as a two-bedroom flat. The upper three floors are accessed independently of the A2 use.

#### **2.0 The Proposal and Relevant Planning History**

**2.1** This application is for the construction of a fourth-floor for use as a two-bedroom flat. All measures necessary under the requirements of the Building Regulations to secure sound insulation between the proposed flat and the unit below, will be implemented.

**2.2** Planning permission was granted in October 2013 for conversion of the third floor into a two-bedroom flat under application reference 2013/4691/P. This has now been implemented. Lack of private amenity space and off-street parking was

not an impediment to granting this consent

### **3.0 Key Policy Considerations**

#### **National Policy**

**3.1** The National Planning Policy Framework (NPPF) has reduced national planning guidance from in excess of one thousand pages to less than one hundred. In doing so it's advice is less detailed, less prescriptive and provides fewer opportunities for the discovery of barriers to place in the way of allowing development through the scrutiny-driven approach that Central Government believes has too often developed into a search for problems rather than solutions in decision-making.

**3.2** This simplification of guidance allied to the encouragement of positive thought is a deliberate strategy in the cause of promoting economic development and achieving a significant increase in housing provision. The purpose of the NPPF is to engender and allow for a positive approach to the accommodation of development, with the **“golden thread”** running through both plan and decision making being the presumption in favour of sustainable development which should be allowed to go ahead **“without delay”**. The NPPF clearly wants decision-makers to give all possible credit to the positive contribution that a development would make and avoid the practice of automatically relegating the good beneath the first sight of a perceived problem. The NPPF is a document that has been conceived to purge out this negative approach and expects decision-makers to be absolutely certain that, if planning permission is not to be granted, material harm would be the result of granting planning permission, and would be so clearly bad that it would not be outweighed by any benefits that the development would bring.

**3.3** The NPPF also promotes a general presumption in favour of protecting, preserving and where possible enhancing designated heritage assets such as Listed Buildings and Conservation Areas.

**3.4** For all development types, it instructs at paragraph 197 that the presumption in favour of sustainable development should always be applied when determining planning applications.

### **The Camden Local Development Framework**

**3.5** This is the currently adopted Local Plan providing the policy framework for the Borough and against which development proposals are judged. There are seven policies of the Core Strategy and ten of the Camden Development Policies document which have some reasonable degree of relevance to the application proposal and have been acknowledged in its conception. They are summarised as follows:

### **The Core Strategy**

**CS1: ‘Distribution of Growth’**

**CS3: ‘Other Highly Accessible Areas’**

**CS5: ‘Managing the Impact of Growth and Development’**

**CS6: ‘Providing Quality Homes’**

**CS9: ‘Securing a Successful Central London’**

**CS14: ‘Promoting High Quality Places and Conserving our Heritage’**

**CS18: ‘Dealing with our Waste and Encouraging Recycling’**

### **Camden Development Policies**

**DP1: ‘Mixed Use Development’**

**DP2: ‘Making Full Use of Camden’s Capacity for Housing’**

**DP5: ‘Homes of Different Sizes’**

**DP6: ‘Lifetime Homes and Wheelchair Homes’**

**DP13: ‘Employment Premises and Sites’**

**DP16: ‘The Transport Implications of Development’**

**DP17: ‘Walking, Cycling and Public Transport’**

**DP18: ‘Parking Standards and Limiting the Availability of Car Parking’**

**DP24: ‘Securing High Quality Design’**

**DP25: ‘Conserving Camden’s Heritage’**

**DP26: ‘Managing the Impact of Development on Occupiers and Neighbours’**

**DP29: ‘Improving Access’**

**3.6** Some of the broad-brush, strategic policies of London Plan 2011 may also bear upon the site and the development proposal and the Council will apply and test against them as necessary.

## **4.0 Design**

**4.1** The philosophy behind the proposal is to achieve:

- Most efficient use of urban land appropriate to local context to accord with the objectives of the Local Development Framework and national policy guidance in the NPPF. Maximisation of site development potential *within* acceptable planning parameters.
- Sustainable development to increase quantity and improve the quality and choice in the local housing stock to accord with the objectives of Local Development Framework and national policy guidance in the NPPF.

**4.2** The proposed development has been designed to reference the proportions, architectural style, detailing and materials of the host building. However, a mildly contemporary element has been included in the north facing elevation in the form of a glazed ‘wall’. This gives the addition a freshness of appearance that is an appropriate reflection of current architectural thought and practice even for Conservation Area settings. Design is of course subjective and doubtless there are other approaches which would be suitable but the chosen approach is a valid and aesthetically pleasing blend of traditional and modern elements.

**4.3** It should also be noted that the host building is but one component of the greater Conservation Area which has value as a *whole* ‘place’ due to the combination of its particular pattern of streets, spaces, buildings, trees and other interesting townscape features. Not only would the proposed development fit

seamlessly and harmoniously into this visually rich setting such that it would be incapable of disturbing the character and appearance even in a more conspicuous position, it would do so at a height level which (it has long been known amongst planning and urban design practitioners) rarely, if ever, registers in public perception. The proposed development would thus be of intrinsically good design and attractive appearance and so inconspicuous that the self-evident conclusion to be drawn is that no harm to the Conservation Area would be caused by it.

**4.4** The proposed flat would be provided with a good sized balcony as a private amenity space. Public open spaces of Bedford and Bloomsbury Square gardens are approximately 300 metres away and within comfortable walking distance and thereby easily accessible without reliance on the private motor car. Scarcity of on-site amenity space is common and unavoidable factor in the wider locality and in assessing the planning merits of the proposed change of use, should be a subordinate consideration that, as a stand-alone planning consideration of secondary importance, should not outweigh the more important strategic national and local policy objective to take available opportunities to increase housing stock where this would make a sustainable contribution.

**4.5** Council issued bags and boxes for waste and recycling will be housed internally.

**4.6** The ethos of the proposed scheme embraces the essential principles of sustainable development as far as can be reasonably expected given that it is for a new dwelling unit within the physical and practical constraints of an existing established site rather than relating to an undeveloped 'blank-canvas' site. All matters remain open to be controlled by imposition of conditions to enable the Council to achieve desired outcomes at the detailed level, where this is considered to be necessary.

## **5.0 Access**

**5.1** The site is within the urban area and situated on a bus route, close to Tottenham Court Road Underground station and within comfortable walking and cycling distance of all day-to-day amenities. It is therefore in a sustainable location.

**5.2** The site has no off-street vehicle parking provision and none can be made. It is within a Low Parking Provision Area as designated in the LDF and wherein the maximum requirement for private dwellings is 0.5 spaces. It is also to be noted that the NPPF promotes development that does not need to rely on the private motor car and does not accommodate it unnecessarily. In this case the site offers easy access to a wide range of services and facilities and access to key modes of public transport, all without reliance on the private motor car, and is similarly accessible itself. In this situation a zero provision of off-street parking is therefore appropriate.

**5.3** Secure internal parking for one bicycle to satisfy the adopted standard would be possible on the balcony. Access to this level would be made possible and convenient by means of an existing lift.

**5.4** The proposed development would be carried out in compliance, as appropriate and as far as practicably possible, with the requirements of Part M of the Building Regulations to allow reasonable access and use to all persons, regardless of disability, age or gender.

## **6.0 Heritage Asset Statement**

**6.1** The relevant heritage asset in this situation is the Conservation Area. The value of the Conservation Area as a designated heritage asset in this part of lies in its pleasing mix of historic architectural character and planned street layout which combine to make a very pleasing townscape experience. The proposed

development has been of use would have no adverse effect on the significance or value of the Conservation Area.

## **7.0 Statement of Community Involvement**

**7.1** The proposed development is relatively minor in nature and would have no appreciable environmental effects on, or adverse implications for, the wider local community. The occupiers of immediately neighbouring properties have been considered in the choice of a residential conversion to ensure that their residential amenities would not be affected to a material and harmful degree. No consultation with neighbours has taken place in the knowledge that all adjoining property owners/occupiers will be directly or indirectly consulted (by public notice) by the Council for their views, as part of the planning application process.

## **8.0 Trees and Biodiversity**

**8.1** There are no trees of high public amenity value on the site. The site provides no important wildlife habitat.

## **9.0 Flood Risk Assessment**

**9.1** The application lies within Environment Agency designated Flood Risk Zone 1 where little, if any, risk of flooding has been identified. No special ameliorative construction or protection measures are considered to be necessary.

## **10.0 Conclusion**

**10.1** The location of the application site in the heart of the urban area of Central London, in combination with the inherent positive planning merits of the development proposal itself, commend it as harmless to any interest of acknowledged importance and beneficial in terms of meeting and supporting national and local housing delivery and Heritage Asset policy objectives. The development is thereby worthy of approval. The Council is respectfully requested to recognise these attributes and grant planning permission accordingly.