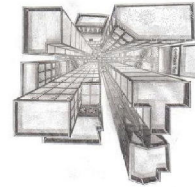


## KR PLANNING

### CHARTERED TOWN PLANNER

183 SEAFIELD ROAD, BOURNEMOUTH, DORSET, BH6 5LJ



Our Ref: L/HPG/10BM/B

01 June 2015

Planning Services  
London Borough of Camden  
Argyll Street  
LONDON  
WC1H 8EQ

Dear Sir/Madam

#### TOWN AND COUNTRY PLANNING ACT 1990

#### DEVELOPMENT TO PROVIDE A BASEMENT FOR B1A AT 10A BELMONT ST LONDON (ALTERNATE SCHEME TO 2014/5502/P AS IT INCLUDES A POOL WITHIN THE SAME APPROVED FOOTPRINT)

Please find enclosed a duly completed full application for the above-mentioned proposed development, submitted on behalf of my Client, Risetall Ltd.

The application is made via the Planning Portal, along with a fee of £195. The application comprises the necessary forms and certificates and the following drawings:-

Drawing No	Title	Scale
150420 - A(GA)090	Proposed Basement	1:100@A1
150420 - A(GA)300	Proposed Section AA	1:100@A1
150420 - A(GA)301	Proposed Section BB	1:100@A1
150420 - A(GA)302	Proposed Section CC	1:100@A1
150420 - A(SO)001	Site Plan	1:1250@A1
150420 - A(SO)300	Consented Section A-A	1:100@A1
150420 - A(SO)301	Consented Section B-B	1:100@A1
150420 - A(SO)302	Consented Section C-C	1:100@A1
150420 - A(SO)403	Consented Basement	1:100@A1

In support of the Planning Application, I enclose the following reports:

- A Basement Impact Assessment
- A draft Construction Management Plan, prepared by URS

We have provided consented floor plans and sections, instead of existing as the basement footprint is already approved and is very soon to be implemented.

All of the above demonstrate that the development accords with Development Plan policy and all known

#### The Proposal

The difference between this scheme and the consented basement, is that this proposes a deeper dig to provide a pool within the already consented footprint.

#### Policy

In March 2012 the Government published the NPPF for immediate application, with transitional provision running across the next 12 months. This is a key part of the Government's reforms to make the planning system less complex and more accessible, and to promote sustainable growth.

In a statement to Parliament, the Right Hon, Greg Clark MP, Minister for Planning, described the local plan as the "keystone of the planning edifice" and emphasised the high-level of discretion that local authorities will exercise following the removal of centrally imposed development targets.

The NPPF retains the '*presumption in favour of sustainable development*', which is defined by five guiding principles as set out in the UK Sustainable Development Strategy (2005):

- Living within environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly

The Government believes that there are three dimensions to sustainable development, economic, social, and environmental, and these give rise to the need for the planning system to play three critical roles in England:

- An economic role- contributing to building a strong, responsive, and competitive economy
- A social role- supporting strong, vibrant and healthy communities
- An environmental role-contributing to protecting and enhancing our natural, built and historic environment

The NPPF sets out 12 core land-use planning principles which "*should underpin both plan-making and decision-taking.*" These stipulate that planning should:

- Be genuinely plan-led, empowering local people to shape their surroundings
- Not simply be about scrutiny
- Pro-actively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs

- Always seek to secure a high-quality design and a good standard of amenity for occupants for all existing and future occupants of land and buildings
- Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them
- Support the transition to a low-carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources and the use of renewable resources
- Contribute to conserving and enhancing the natural environment and reducing pollution;
- Encourage the effective use of land by reusing land that has been previously developed (brownfield land);
- Promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas
- Conserve heritage assets "in a manner appropriate to their significance"
- Actively manage patterns of growth to make fullest possible use of public transport, walking and cycling
- Take account of and support local strategies to improve health, social and cultural wellbeing for all

#### Growth

As a related document and in advance of the NPPF, in March 2011 the Minister for Decentralisation via the Chief Planner, issued a ministerial statement highlighting the economic difficulties and the need for LPA's to be responsive to a growth agenda:

*The Government's clear expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy.*

And

*When deciding whether to grant planning permission, local planning authorities should support and facilitate housing, economic and other forms of sustainable development.*

#### Design

Section 7 of the NPPF focuses on the importance of good design. It states that "good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people." It encourages local plans to set out policies and consider design codes to set the design expectations of an area based on objectives for its future, including optimising "the potential of the site to accommodate development" and responding to "local character and history". However, such policies should avoid unnecessary detail or prescription and imposing particular architectural style, allowing innovation in design.

#### LDF Policy

Policy CS8 is an aspirational policy which seeks to ensure that the borough retains a strong economy. It seeks to do this by, amongst other things, safeguarding existing employment sites that meet the needs of modern industry and employers.

Policy DP13 seeks to implement the priorities outlined in CS8 and is permissive of the provision of additional

floor space in mixed use scheme. The 2009 proposal for the site can be distinguished against this proposal as it sought to re-provide most of the existing commercial floorspace in basement accommodation, a solution that the Inspector found wanting. In particular, her concern related to natural light provision which differs from this scheme as the north studio meets or surpasses the BRE average Daylight Factor targets.

The extension provides for ancillary accommodation for the office where daylight is not normally a requirement (toilets, kitchen, plant room & gym). The provision of these ancillary spaces within the basement allows for superior quality employment space on the ground and basement (BRE compliant) employment floorspace.

The other issue at the appeal was the impact on adjoining employment floorspace. The material change of circumstance here is that extension is much reduced in size, and actually aligns with the hoarding already in situ on the site to allow the existing construction works to occur. The neighbouring buildings have continued operationally during this construction, and therefore, those previous concerns can be demonstrated to be inaccurate.

DP27 concerns itself with control of basement development. A basement impact assessment has been carried out in regard to the proposed single storey basement element of the development. The report has been prepared by Pringuer-James Consulting Engineers on behalf of the applicant detailing the screening process, onto a further scoping which identifies relevant issues and impacts; and from there a desk study and site investigation to enable an accurate assessment of the impacts identified in the first two stages. The screening process has been adopted in accordance with CPG4 based on the relevant flow charts presented in that document.

#### Conclusion

We trust the attached documentation is sufficient for validation [REDACTED]

Yours Sincerely

[REDACTED]  
Kieran Rafferty

**BA(URP) CUKPL MPIA MRTPI**

**ENCL:**