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& Partners

Planning. Design. Economics.

No. 13 Red Lion Square

Planning and Heritage Statement

13-17 Red Lion Square LLP

18 December 2015

14774/MH/ON/TN

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1.0 Introduction

1.1 This Planning and Heritage Statement has been prepared by Nathaniel Lichfield & Partners (NLP) to accompany an application for full planning permission and relevant demolition in a Conservation Area submitted on behalf of 13-17 Red Lion Square LLP. The application relates to 13 Red Lion Square and is for:

“Relevant demolition of external stair core structure, storage shed, and partial demolition of the rear single storey extension located in the courtyard at lower ground floor level and the reconfiguration of the internal layout resulting in the creation of one net additional residential unit through the conversion of a storage/office area, an additional rear extension and use of the pavement vaults for plant.”

Documentation

1.2 In addition to this Planning and Heritage Statement and the plans and drawings submitted, the application is accompanied by the following documents:

- 1 Design and Access Statement
- 2 Daylight and Sunlight Assessment
- 3 Transport Statement
- 4 Energy and Sustainability Assessment
- 5 Air Quality Assessment
- 6 Flood Risk and Drainage Statement
- 7 Acoustic Assessment
- 8 Utilities Report

Structure of Statement

1.3 This Planning and heritage Statement contains the following:

- Description of the development site and surrounding area including planning history (Section 2)
- Description of the proposed development (Section 3)
- Identification of key relevant national and local planning policies and guidance (Section 4)
- Consideration of the relevant planning and heritage issues (Section 5)
- Summary and conclusions (Section 6)

1.4 This Statement should be read in conjunction with the application plans, drawings and other supporting documentation.

2.0 **Development Site and Surroundings**

Site Description

- 2.1 The application site is located on the corner of Dane Street and Red Lion Square, to the south of Red Lion Square Gardens which is a public open garden. The site comprises Halsey House, a six storey late Victorian block of flats which contains 12 existing units and ancillary storage and office space at lower ground floor. The residential units are arranged over six floors across lower ground to fourth floor level. There are existing railings attached to the northern and western façade of Halsey House and these mark the location of a number of existing lightwells.
- 2.2 The existing layout of the building is as follows:
- Lower Ground floor – 2 studio flats and storage/office space
 - Ground floor – 2 x two bed flats
 - First Floor - 2 x two bed flats
 - Second Floor – 1 x two bed flat and 1 x three bed flats
 - Third Floor – 1 x two bed flat and 1 x three bed flats
 - Fourth Floor – 2 x two bed flats
- 2.3 The building can be accessed via two entrances one on Red Lion Square (the main entrance) and a secondary entrance on Dane Street. Both lead to a central internal stair core. The lower ground studio units can be accessed via steps from the Red Lion Square frontage.
- 2.4 There is a courtyard to the rear of the site at lower ground floor and this can be accessed from the communal circulation areas of the building. The courtyard includes an external staircase which serves as a fire escape route, and a wooden shed. The shed was previously used to provide an office and storage space for the on-site maintenance personnel.
- 2.5 Halsey House is neither statutorily nor locally listed but it falls within the Bloomsbury Conservation Area. The Conservation Area Appraisal identifies that it makes a positive contribution to the character and appearance of the Bloomsbury Conservation Area.
- 2.6 The existing site arrangements do not provide for any car parking space for the residential units, however the existing 12 residential units have the right to apply for on-street parking permits. The site is within a Controlled Parking Zone and is restricted to resident permit holders only with restrictions between 08:30-16:30 Monday to Friday, and 08:30 and 13:30 Saturday. There is currently no dedicated cycle parking facility on site.
- 2.7 On Red Lion Square, to the west of Dane Street, Pay and Display parking bays are also provided on both sides of the carriageway. Residents of the existing

dwellings at 13 Red Lion Square are eligible to apply for residential parking permits from the Council.

- 2.8 The site overlooks the communal garden at Red Lion Square and is bound by Red Lion Square to the north, Dane Street to the west and a terrace of Grade II listed townhouses (14-17 Red Lion Square) to the east. To the south is a communal parking area which serves the block of flats to the south of the car park.
- 2.9 The closest London Underground Station is Holborn, to the south west of the site approximately 5-10 minute walk. The site is served by a number of bus routes and the nearest bus stops are located approximately 160m away on Procter Street. The site has a PTAL rating of 6b (excellent).

Relevant Planning History

- 2.10 Set out below is the relevant planning history for the site available on LB Camden's online planning system:
- LPA ref. P9602871 – Application for the change of use of basement from storage and office use to provide 2 studio flats and office floorspace was granted planning permission on 9 January 1997.
 - LPA ref. 9201281 – Application for the change of use of the basement floor from offices (B1) to use as a restaurant (A3) as shown on drawing numbers 117/01 & 02 was refused on 18 February 1993. Subsequent appeal dismissed on 2 September 1993.
- 2.11 Based on the current arrangement we understand that application P9602871 was only partially implemented. The two units were created at Lower Ground Floor but the office was only partially refurbished and remained ancillary storage and office space for on-site maintenance personnel.

Surrounding Area (Heritage Context and Setting)

- 2.12 The application site is situated in the Bloomsbury Conservation Area which was first designated in 1968 and subsequently extended on numerous occasions to reflect a growing appreciation of Victorian, Edwardian and high quality 20th Century architecture. Bloomsbury Conservation Area Appraisal (2011) notes that the square is surrounded by a variety of building types, styles and ages.
- 2.13 The Conservation Area Appraisal identifies the following characteristics for the area:
- 1 Terraces of townhouses opening out into the square
 - 2 Fine urban grain with predominantly small built footprint and narrow frontages
 - 3 Buildings are either situated immediately behind the pavement edge or benefit from small front gardens enclosed by iron railings

- 4 Little street planting and soft landscaping is generally confined to the square
- 5 Predominant materials for the townhouses are brick, either in a more common yellow or in a red-brown colour.

3.0 **Development Proposals**

3.1 The application proposes a number of alterations to both internal and external elements of the existing building which will require planning permission. These are as follows:

General

- Demolition of external fire escape stair core (which runs the height of the building)
- A new lift including minor infill to upper floors.

Lower Ground Floor

- Reconfiguration of existing lower ground storage/office space into a new two bed-flat
- Partial demolition of the single storey extension and shed located in the courtyard.
- New infill extension to the rear of the building in the courtyard to provide a habitable room for the new two-bed flat at lower ground floor.
- New glazed extension to provide additional living space for the new two-bedroom flat.
- New light wells along the western elevation of the building to provide additional light into the proposed lower ground floor flats.

Ground Floor

- New ground floor infill extension to the rear of the building to provide cycle storage with a capacity of 16 cycles.
- Replacement window to east elevation.

First Floor

- New first floor infill extension to the rear of the building to provide one additional habitable room.
- Reconfiguration of existing two bedroom flat into 2 x one-bed flats

Second Floor

- New first floor infill extension to the rear of the building to provide additional floorspace for the existing three bedroom unit

Third Floor

- No additional changes

Fourth Floor

- Combining the two existing two bedroom flats to provide a four bedroom unit across fourth floor.

Roof Level

- New flat roof over the proposed rear extension on the third floor
- New sloping roof over the lift infill area which is proposed to match the existing roof.

Access and Car Parking

3.2

Access arrangements will remain as existing and there is no car parking proposed as part of the development.

4.0 **Planning Policy and Guidance**

4.1 This section identifies key relevant planning policy and guidance at a national and local level relevant to this proposal. The proposed development is then assessed against these policies in Section 6.

Policy Context

4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”

4.3 The statutory development plan for the site comprises the London Plan (Further alterations to the London Plan 2015), London Borough of Camden Core Strategy 2010-2025 (adopted in 2010) and the Camden Development Policies DPD 2010-2025 (adopted in 2010).

4.4 Local Planning Authorities are required to review their plans to ensure consistency with the National Planning Policy Framework (NPPF). The NPPF advises that for the purpose of decision taking, policies in the Local Plan should not be considered out-of-date simply because they were adopted prior to the publication of the NPPF (para 2.11). Where there is inconsistency, the NPPF should prevail.

Site Designation and Relevant Planning Policies

4.5 There is no site specific land use allocation on LB Camden’s Policies Map, however the site is located within the Bloomsbury Conservation Area and the Archaeological Priority Area.

4.6 There are no statutory or locally listed buildings on the site. However the Conservation Area Appraisal states that the Halsey House makes a positive contribution to the character and appearance of the Conservation Area.

4.7 London Borough of Camden Strategic Flood Risk Assessment (SFRA) (July 2014) identifies the entire Camden Borough as being located in Flood Risk Zone 1.

4.8 Having regard to the statutory development plan and site designations identified above, and the existing circumstances and context of the site, we consider that the local planning policies below are relevant to this application.

Core Strategy 2010-2025:

- CS1 Distribution of Growth - focus Camden’s growth in the most suitable locations, and manage it to make sure that we deliver its opportunities and benefits and achieve sustainable development

- CS4 Areas of more limited change - development to respect the character of its surrounding and to bring benefit to these areas.
- CS5 Managing the impact of growth and development - e.g. consideration to meeting needs of population; providing sustainable buildings.
- CS6 Providing quality homes – Making full use of Camden’s capacity for housing.
- CS11 Promoting sustainable and efficient travel - promotes the availability of sustainable transport including walking, cycling and public transport.
- CS13 Tackling climate change through promoting higher environmental standards - development to minimise the effects of, and adapt to, climate change and to meet the highest feasible environmental standards that are financially viable.
- CS14 Promoting high quality places and conserving our heritage - promotes high quality, attractive, safe and accessible development.

Camden Development Policies 2010-2025:

- DP2 Making Full Use of Camden’s Capacity for Housing
- DP5 Homes of different sizes
- DP6 Lifetime homes and wheelchair homes
- DP16 The transport implications of development
- DP17 Walking, cycling and public transport
- DP18 Parking standards and limiting the availability of car parking
- DP19 Managing the impact of parking
- DP22 Promoting sustainable design and construction
- DP23 Water
- DP24 Securing high quality design
- DP25 Conserving Camden’s heritage
- DP26 Managing the impact of development on occupiers and neighbours
- DP27 Basements and lightwells
- DP28 Noise and vibration
- DP32 Air quality and Camden’s Clear Zone

Other Material Considerations

Bloomsbury Conservation Area Assessment

4.9

The *Bloomsbury Conservation Area Appraisal and Management Strategy* was adopted in 2011. The Assessment outlines the Council’s approach to the preservation and enhancement of the Bloomsbury Conservation Area. This

includes a detailed assessment of the character of specific sub areas including Red Lion Square (Sub Area 11).

Camden Planning Guidance

- 4.10 London Borough of Camden has adopted a number of Supplementary Planning Documents (SPDs) which support the Core Strategy and Development Management Policies, providing further advice and guidance on policies. These are material considerations in the determination of this application.
- 4.11 The Camden Planning Guidance covers a range of topics (such as design, sustainability, amenity and planning obligations) and should be considered in conjunction with, and within the context of, Camden's Development Plan policies.

Mayor of London Supplementary Planning Guidance

- 4.12 The following Mayor of London Supplementary Planning Guidance documents are relevant to the consideration of this planning application
- 1 Housing (November 2012) - including residential design standards
 - 2 Character and Context (June 2014)
 - 3 Sustainable Design and Construction (April 2014)

National Planning Policy Guidance

- 4.13 The NPPF (March 2012) sets out the Government's overarching objectives for the planning system to enhance and improve the places in which people live their lives, and at the heart of it is a:
- "presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision taking"* (para 14).
- 4.14 Boosting the supply of housing (para 47), delivering a wide choice of high quality homes, increasing opportunities for home ownership and creating sustainable, inclusive and mixed communities is key to the NPPF (paragraphs 49 & 50).
- 4.15 Good design is also a key aspect of sustainable development and should contribute positively to making places better for people (para 56) and should promote or reinforce local distinctiveness (para 50).
- 4.16 The NPPF also requires that consideration is given to the impacts of development on the significance (including setting) of designated and non-designated heritage assets (paras 131 - 135).

Emerging 'draft' Local Plan

- 4.17 Camden Council is in the process of reviewing its main planning policies and a public consultation on the first iteration of the new Local Plan was undertaken in April 2015. Following this the Council will produce a revised draft of the plan, which is due to be published for further consultation next year.
- 4.18 The NPPF (paragraph 216) makes it clear that decision-takers may give weight to relevant policies in emerging plans according to their stage of preparation (the more advanced the preparation, the greater the weight that may be given), the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the NPPF.
- 4.19 Emerging local plans start to gain some weight as a material planning consideration as they progress to adoption (e.g. Pre-submission stage), however the degree of weight given to each draft policy will vary, depending on whether or not the issue is contentious and to what extent it is consistent with the NPPF.
- 4.20 Given that the new Local Plan is at its earliest stage of consultation, in line with the intent of the NPPF, policy which differs from the objectively assessed policy within the extant Core Strategy and Development Management Policies DPD is not considered to be a material consideration in the determination of this application.

Key Policy Considerations

- 4.21 From our analysis of the statutory development plan, national policy and other planning guidance, we consider the following planning considerations represent the key planning issues against which the planning application should be considered.
- 1 The principle of development
 - 2 Design
 - 3 Conservation and Heritage
 - 4 Transport
 - 5 Amenity
 - 6 Flood Risk and Drainage
 - 7 Sustainability
 - 8 Air Quality
 - 9 Noise and Vibration
 - 10 Planning obligations/Community Infrastructure Levy

The development plan must be looked at as a whole taking into account an assessment of material considerations. The assessment in Section 5 sets out the material considerations relevant to this proposal and concludes that when

taking these into account the application should be granted planning permission.

5.0 **Planning Considerations**

Principle of Development

- 5.1 The site is currently in residential use and located in a mixed use urban location. The proposed reconfiguration of the existing internal layout to provide a net additional unit on this site should be acceptable in principle as the residential land use is established and the opportunity to provide an additional unit which better utilises the site in a sustainable fashion without appearing cramped /overdeveloped should be supported by the Council. This is in line with the core planning principles of NPPF and the presumption in favour of sustainable development.
- 5.2 The storage area/office space that is being converted into a flat at ground floor level was created through the implementation of a planning permission dated 9 January 1997 (we do not believe that the approved development was not completed in full). The space was last used as storage and work space for maintenance personnel as an ancillary function to the residential use. As such we do not consider it to represent a loss of office space, as it has served as an ancillary residential use for a significant period. Further to this, without separate access it cannot function as a commercial office space. The flats are now managed by an external management company and the lower ground floor area has been underutilised for some time.

Design

- 5.3 The NPPF considers good design to be a key aspect of sustainable development which should contribute positively to making places better for people. The NPPF states that sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including replacing poor design with better design (para 9).
- 5.4 At para 57 the NPPF states that it is important to plan positively for the achievement of high-quality and inclusive design of all development, including individual buildings. Furthermore Policy 3.5 of the London Plan (Quality and Design of Housing Developments) states that "*housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment....to protect and enhance London's residential environment and attractiveness as a place to live*".
- 5.5 Core Strategy 14 and Policy DP24 require all developments to be of the highest standard of design and to consider the local character, setting, context and the form and scale of neighbouring buildings. Policy DP24 also expects developments to consider the character and proportions of the existing building, where alterations and extensions are proposed and the quality of materials.

- 5.6 Furthermore, in respect to character and context, the London Plan SPG ‘Character and Context’ (June 2014) considers the following: *“Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.”*

Removal of external stair core

- 5.7 It is proposed to demolish the incongruous external fire escape stair core to the rear which is currently in a dilapidated condition.
- 5.8 The proposed removal of the stair core will represent an improvement to the current rear façade of the building and will preserve this part of the conservation area, in line with Policy DP25.

Extension to the rear

- 5.9 The new infill extension will face onto the courtyard car park area to the south and given the enclosed nature of this area the proposed extension will not be visible from the surrounding streets and views.
- 5.10 Notwithstanding the above the proposed infill extension has been designed to sit in harmony with its host building, Halsey House, which has been identified as making positive contribution to the Conservation Area. The design proposes a gradually scaled back rear elevation in high quality materials in order to respect the adjacent Grade II listed Building (no. 14 Red Lion Square) as well as the character and appearance of the Conservation Area. Therefore the proposed extensions will have no harmful impact on the character of the conservation area in line with policy DP24 and DP25.

Conversion of ancillary storage/office space into residential unit

- 5.11 It is proposed to convert the existing lower ground floor storage area into a two bedroom flat.
- 5.12 In addition, three new light wells are proposed on the ground floor along the Dane Street elevation of the building. The proposed lightwells are narrow and modest in scale and have been designed to protect the architectural character of the building and will have no adverse impact on the character and appearance of the surrounding area, in line with policy DP27.
- 5.13 The provision of additional accommodation below ground level enables efficient use to be made of the existing lower ground floor to meet the demands of the typical occupier in the current market with little or no visual impacts, in line with policy DP27. Given that no additional excavation / extension to the existing lower ground floor is proposed the proposals will not have any adverse impact on the built and natural environment or local amenity and will not result in drainage, flooding, adverse groundwater conditions and structural instability to both the host and nearby buildings, in line with Policy DP27.

Reconfiguration of internal layout

5.14 The application proposes the reconfiguration and refurbishment of the internal building layout in order to provide high quality residential units with a mix of dwelling sizes.

5.15 Through the proposed rear extension and internal reconfiguration the application site will be able to accommodate one net additional residential unit, contributing to Camden’s housing supply. The final block will contribute to the creation of mixed communities and will maintain over 40% two-bed flats in line with Policy DP6. In addition, 24% of the overall mix will provide for family homes (3 and 4 bedroom units) in a part of the borough where there is a relatively low proportion of larger dwellings (i.e. ward of Holborn and Covent Garden). A break-down of the existing and proposed dwelling sizes is provided in the below tables:

	Studio	1 bed flat	2 bed flat	3 bed flat	4 bed flat
Existing - 12 units	2	0	8	2	0
Proposed - 13 units	2	2	6	2	1

5.16 The design proposals are in line with Camden Development Policy DP24, have been informed by Camden Planning Guidance 1: Design (CPG1) and CPG2: Housing and are of the highest standard of design. The proposals have taken account of the character of the surrounding Conservation Area and neighbouring properties, as well as the amenity of future occupiers and surrounding neighbours.

5.17 The proposals have had regard for Lifetime Homes as is a requirement of DP6 and section 5 of CPG 2: Housing. According to the Lifetime Homes official website, the principle of Lifetime Homes is as follows:

“The Lifetime Homes Standard was established in the mid-1990s to incorporate a set of principles that should be implicit in good housing design. Good design, in this context, is considered to be design that maximizes utility, independence and quality of life, while not compromising other design issues such as aesthetics or cost effectiveness.

The Lifetime Homes Standard seeks to enable ‘general needs’ housing to provide, either from the outset or through simple and cost-effective adaptation, design solutions that meet the existing and changing needs of diverse households. This offers the occupants more choice over where they live and which visitors they can accommodate for any given time scale. It is therefore an expression of Inclusive Design.

Housing that is designed to the Lifetime Homes Standard will be convenient for most occupants, including some (but not all) wheelchair users and disabled visitors, without the necessity for substantial alterations.”

5.18 The criteria are not fixed requirements set to dictate design. They encourage flexibility to deliver housing which can be easily accessed by as many people as possible without enforcing a single design approach. They also should

provide a dwelling which can be adapted during the lifetime of the occupant to meet changing needs. The Design and Access Statement provides details of our approach to Lifetime Homes. However the inclusion of a lift will improve access to all units in 13 Red Lion Square and the new lower ground floor dwelling is designed to meet the interior design requirements of Lifetime Homes.

- 5.19 The scale of the proposed internal layout allows for comfortable arrangement of rooms and habitable spaces and as such, unit sizes of the new dwellings will meet London Plan Standards (Table 3.3).

Conservation and Heritage

- 5.20 Para 135 of the NPPF states that *“the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*
- 5.21 Para 137 of the NPPF notes that proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 5.22 Core Strategy Policy CS14 states that the Council will ensure that Camden’s places and buildings are attractive, safe and easy to use by (a) requiring development of the highest standard of design that respects local context and character; and (b) preserving and enhancing Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens. Policy DP25 requires all development within conservation areas to preserve and enhance the character and appearance of the area. This is reflective of the Councils duty under Policy 7.8 of the London Plan.
- 5.23 Whilst the site is located in an Archaeological Priority Area, Historic England’s GLASS service confirmed that given the scale of the proposed extension, it is unlikely that the proposals would result in a significant impact on the archaeological interest. On this basis, GLASS has confirmed that a Desktop-based Assessment will not be required to be submitted with the application, nor would there be a request for an archaeological condition. Confirmation of the above from Historic England has been submitted with this application.
- 5.24 The proposed infill extension will face onto a rear courtyard car park area and given the enclosed nature of this ‘back of house’ area the proposed extension will not be visible from the surrounding streets and views. This is also the case for the proposed replacement window at ground floor level which will be in keeping with the existing windows around it.
- 5.25 Having regard to the Bloomsbury Conservation Area Assessment, the proposed extension has been designed to sit in harmony with its host building,

Halsey House, which has been identified as making a positive contribution to the Conservation Area. The design proposes a gradually scaled back rear elevation in high quality materials in order to respect the adjacent Grade II listed building as well as the character and appearance of the Conservation Area and will have no harmful impact on the significance of the undesignated Halsey House, in line with para 135 of the NPPF. The proposals are therefore in line with the requirements of Camden Development Policy DP25 and the intent of the NPPF core planning principle directing planning to be *“not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives”*.

Transport and Car Parking

- 5.26 Core Strategy CS11 aims to promote sustainable transport choices in order to reduce congestion and the environmental impacts of travel by minimising the provision for private parking in new developments, in particular through car free developments in the borough’s most accessible locations.
- 5.27 London Plan Table 6.2 and Camden’s DP18 sets out the standards for car parking and cycle parking and aims to ensure that developments provide the minimum necessary car parking. In line with the existing parking arrangements for the site, the proposed development would come forward as a car free-development and therefore the proposals do not provide for any car parking spaces. Existing units have a right to apply for parking permits and this right would be maintained.
- 5.28 It is proposed to provide a new cycle storage facility on the ground floor which will have the capacity to accommodate 16 cycle parking spaces. In line with the intent of Camden’s Parking Standards (Appendix 2 of the DMD) this allows the development to provide a minimum of one cycle parking for each of the existing units and the one new proposed unit.
- 5.29 Communal bin stores for refuse, recycling and food waste will be located in the lower ground light well to the front of the property. A management company will be employed to move bins from the lower ground level to the street level on collection day which is consistent with the existing arrangements of the residential units.
- 5.30 The proposed development would create one new unit in addition to the existing 12 residential units on site. The application is accompanied by a Transport Statement which assesses the proposals in the context of current policy and guidance and found that there would be no material difference in the number of vehicular traffic associated with the proposed development.
- 5.31 In terms of accessibility, the site is located in a highly accessible urban location within the Central London Area, PTAL rating of 6b (Excellent) and therefore the proposed car free additional unit is in line with policy CS11, DP16, DP17, DP18, DP19 and the aspiration of the London plan Policy 6.13.

Amenity

- 5.32 The NPPF encourages positive planning to achieve high-quality architecture, reflective of local surroundings and materials with a good standard of amenity for all existing and future occupants of land and buildings (paras. 12 and 58).
- 5.33 Policy DP26 seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity in terms of privacy, overlooking, overshadowing and outlook, sunlight and daylight. Supplementary guidance on design and amenity is provided in CPG1: Design and CPG4: Amenity.
- 5.34 The proposed infill extension has been designed to respect the amenity of the neighbouring and surrounding occupiers. The proposal would not have a material impact on daylight and sunlight to habitable rooms at surrounding properties to the east and south, nor would it result in any material degree of overshadowing of adjoining garden at 14- 17 Red Lion Square. The proposed additional habitable spaces at lower ground, first and second floor within the new extension would also benefit from adequate daylight and sunlight. A daylight and sunlight assessment has been submitted with this application detailing the acceptability of the new basement dwelling.
- 5.35 No new windows are proposed on the main street elevations along Red Lion Square and Dane Street. First and second floor levels have been set back at the rear and no external balconies or terraces are proposed above ground floor level. The fenestration of the new extension at the rear has been designed to avoid any material increase in overlooking to surrounding properties and gardens.
- 5.36 The proposed design fully considers the impact of the development on its occupiers and neighbours and is in line with Policy DP26, Core Strategy Policy CS5 and Camden's Planning Guidance.

Drainage and Flood Risk

- 5.37 London Borough of Camden Strategic Flood Risk Assessment (SFRA) (July 2014) identifies the entire Camden Borough as being located in Flood Risk Zone 1 (low probability of flooding), where there is a less than 0.1% (1 in 100) annual probability of flooding from fluvial or tidal sources.
- 5.38 The accompanying Flood Risk Assessment (FRA) confirms that the following:
- 1 The site is in Flood Zone 1 ("Low" probability of tidal and river flooding) and, as a result, the Sequential and Exception Test is not required.
 - 2 The site is in an area with "Very Low" risk of surface water flooding according to the EA surface water flood map.
 - 3 The site has a "Very Low" risk of flooding from sewer, groundwater and from artificial sources as shown on the EA flood map.

- 5.39 The disposal strategy for the site will utilise existing connections to discharge surface water into Thames Water combined network.
- 5.40 There will be no change to the existing building footprint or the associated hardstanding area in the courtyard and therefore there will be no increase in the surface water runoff as a result of the proposed development. Due to existing site constraints there is no space within the development to incorporate SUDs features to provide additional surface water runoff mitigation.
- 5.41 The FRA confirmed that the proposals are consistent with national policy and national guidance on flooding, along with the Camden's Strategic Flood Risk Assessment and Policy DP23.

Sustainability

- 5.42 Full details of how the scheme will respond to Development Policy DP22 and CPG3: Sustainability as well as Section 5 of the London Plan is provided within the accompanying Sustainability and Energy Statement.
- 5.43 Policy CS13 encourages all development to meet the highest feasible environmental standards that are financially viable during construction and occupation by minimising carbon emission from the redevelopment, construction and occupation of buildings by implementing the energy hierarchy. The proposals for an upgraded roof and passive design measures in conjunction with low energy efficient building services systems will result in a total regulated CO2 emission of 30% compared to the existing situation.
- 5.44 Whilst the development, which requires planning permission, falls below the threshold under Policy DM22 for a BREEAM Domestic Refurbishment Assessment, for best achievable practice, the BREEAM standards have been applied to the entire refurbishment, including for works to flats where planning is not required.
- 5.45 The accompanying BREEAM Domestic Refurbishment Pre-Assessment demonstrates that the proposed development could achieve a 'Good' rating, with a predicted score of 61. Whilst this would be below the 'Excellent' rating required by Camden of a larger development, the proposals would strive to achieve the minimum standards for the Water (60%) and Materials (40%) categories with Energy (50%) being close to 60% target.
- 5.46 These results are considered to be acceptable given the nature and scale of the development and the Energy and Sustainability Statement provides details of how these targets will be achieved.

Air Quality

- 5.47 Parts of Camden have some of the poorest air quality levels in London and as such the Council has declared an Air Quality Management Area (AQMA) that encompasses the entire Borough. Therefore the proposed development is located in an AQMA.

- 5.48 A detailed Air Quality Statement is submitted as part of this application which assesses the potential impacts of existing and future traffic levels on a proposed residential development. Based on the outcome of the assessment the report concluded that mitigation measures would be required in order to minimise the impact of poor air quality on the future occupants of the proposed development, in line with Policy DP32.
- 5.49 These suggested measures include natural air filtration or mechanical ventilation systems. The details of mechanical ventilation or air filtration systems would be fully proposed post planning to ensure that the development is protected against air and noise pollution and is suitable for occupation. This could be dealt with by way of a planning condition.

Noise and Vibration

- 5.50 The proposals have been reviewed against Policy DP28 in respect to their suitability for the location and their impact on neighbours. An Acoustic Report has been submitted with the application which demonstrates the suitability of the site for continued residential development based on the proposed layout and the measured noise levels arising from traffic movement and general pedestrian and commercial activities.
- 5.51 It is proposed that there will be some mechanical plant to ventilate the property. The details of mechanical ventilation or air filtration systems would be fully proposed post planning however the Noise Assessment has identified acceptable noise parameters within which the plant could operate. This would be in accordance with the intent of Policy DP28 and recognised British Standards.

Planning Obligations and CIL

CIL

- 5.52 From 1 April 2012 the Mayor of London's Community Infrastructure Levy (CIL) was applied throughout Greater London. The Mayor has set £50 per sqm for residential development in Camden.
- 5.53 Camden Council has introduced its CIL Charging Schedule on 1 April 2015 and proposes a rate of £500 per sqm for residential development.
- 5.54 As the existing properties have been in occupation for 6 months of the previous 36 months the existing floor space that will be reconfigured and refurbished will be deducted from the CIL calculations and therefore CIL will be chargeable on the uplift in floor space only.
- 5.55 For the purpose of CIL calculation the additional GIA floorspace has been outlined on the accompanying CIL Additional information Form.

Planning Obligations

5.56

The proposals would result in the net increase of one residential dwelling and would not have capacity to accommodate 10 units and as per paragraph 2.23 CPG2 should not contribute to affordable housing.

6.0 **Summary and Conclusion**

6.1 This planning application has been submitted in respect to proposals for

“Relevant demolition of external stair core structure, storage shed, and partial demolition of the rear single storey extension located in the courtyard at lower ground floor level and the reconfiguration of the internal layout resulting in the creation of one net additional residential unit through the conversion of a storage/office area, an additional rear extension and use of the pavement vaults for plant.” at 13 Red Lion Square.

6.2 The proposed development will improve the quality and living standards of Camden’s existing housing stock and will provide one additional unit through sensitive extension and refurbishment of the building.

6.3 The proposals represent an improvement to the sustainability, air quality and noise conditions of the existing building, whilst minimising impacts on the surrounding neighbours and preserving the conservation area. As such they comply with the intent of the NPPF, London Plan and local Camden planning policies.