

**TRIANGLE INVESTMENTS AND  
DEVELOPMENT LTD**

**35-41 NEW OXFORD STREET, 10-12  
MUSEUM STREET & 16A-18 WEST  
CENTRAL STREET**

**PLANNING STATEMENT**

**APPLICATION FOR PLANNING PERMISSION**

**JANUARY 2016**

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## 1.0 INTRODUCTION

1.1 This Planning Statement (“the Statement”) has been prepared by Montagu Evans LLP to assist with the consideration and determination against relevant planning policy and other material considerations of an application for detailed planning permission (“the Application”) by Triangle (“the Applicant”) for development at 35-41 New Oxford Street, 10-12 Museum Street and 16A-18 West Central Street (“the Site”).

1.2 The proposed development will involve the mixed use development of the site to provide:

- Replacement of existing substandard ‘homes of multiple occupation’ with 21 residential units (comprising a mix of 7x1 bedroom, 12x2 bedroom and 2x3 bedroom units;
- A minimum of 352 sqm (GEA) of office accommodation;
- 1,055 sqm (GEA) of flexible A1,2,3,4 and/or B1a and/or D1/2 use floorspace at mezzanine, ground and basement level;
- Removal of the vacant nightclub on West Central Street;
- Plant and supporting facilities for the above uses; and,
- Cycle parking spaces.

1.3 The Site is allocated within the London Borough of Camden (“LBC”) Site Allocations Plan for mixed use development through the conversion, extension and partial redevelopment of the Site.

1.4 The Planning Application seeks planning permission for:

*“Refurbishment and extension of existing buildings for a residential led mixed use scheme of part three, part four storey buildings incorporating 21 residential units and flexible A1,2,3,4 and/or B1a and/or D1/2 use floorspace at mezzanine, ground and basement level and associated works.”*

1.5 Full details of the proposals are set out in the Design and Access Statement, prepared by TP Bennett, which forms part of this Application.

### **Pre-application Engagement**

1.6 Extensive pre-application consultation has been undertaken. This has informed the design of the scheme which has been revised to address comments raised through the pre-application consultation process.

1.7 A pre-application meeting was held with planning and conservation and design officers on 15<sup>th</sup> October 2015. The Applicant and design team then met with Zenab Haji-Ismail (Planning Officer) Antonia Powell (Conservation and Design Officer), Steve Cardno (Highways Officer) and Richard Wilson (Head of Urban Design) at the site on 22 October 2015.

- 1.8 Formal written pre-application advice was received on 22<sup>nd</sup> December 2015. In summary, officers were of the view that the proposals were acceptable in principle both in terms of the proposed uses and design. Whilst a number of points of clarification were sought from the officer regarding her advice (e.g. precise planning obligations, approach to the potential loss of B1a floor space and the site’s corresponding capacity to deliver housing numbers required by Camden’s SHLAA and five year land supply), the proposals fully reflect the advice received to date albeit that certain detailed aspects of the scheme may require further discussion during the application’s determination.
- 1.9 The Applicant and officers have committed to a Planning Performance Agreement.
- 1.10 Consultation with local residents, stakeholders and councillors has been undertaken throughout the design process. This included a public exhibition on 7 and 11 November 2015 and other meetings with key stakeholders and individuals. A detailed description of the pre-application consultation process is provided within the Statement of Community Involvement, prepared by Quattro, which forms part of this Application.
- 1.11 The Applicant will continue to engage with all of the above parties as appropriate following submission of this Application.

**Purpose and format of the Planning Statement**

- 1.12 The purpose of this Planning Statement is to provide information to allow for an informed assessment of the development proposals against relevant national, regional and local planning policy and other material considerations.
- 1.13 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the application have been taken into account. This assessment brings together the findings of the technical reports identified below and, having regard to these, provides a balanced planning judgement on the merits of the proposals.
- 1.14 The scope of supporting information has been established with regard to the national and local list requirements, alongside feedback during the course of pre-application engagement with LB Camden officers. The schedule of documents is set out in **Table 1.1** below.

**Table 1.1 – Schedule of Planning Application Documents**

<b>Title</b>	<b>Author</b>
Cover Letter	Montagu Evans
Application Form (including Ownership Certificates)	Montagu Evans
CIL Forms	Montagu Evans
Site Location Plan	TP Bennett
Site Plan	TP Bennett
Existing, Demolition and Proposed Application Drawings	TP Bennett

Design and Access Statement (including area schedule and residential unit mix inter alia)	TP Bennett
Planning Statement	Montagu Evans
Affordable Housing Statement (submitted under separate cover due to commercial sensitivity)	Savills
Heritage and Townscape Assessment	Montagu Evans
Statement of Community Involvement	Quatro
Ground Investigation and Basement Impact Assessment Report	Mason Navarro Pledge
Structural Methodology Statement	Mason Navarro Pledge
Historic Environment Assessment (Archaeological Assessment)	MOLAS
Preliminary Ecological Appraisal	Phlorum
Air Quality Assessment	Peter Brett Associates
Daylight and Sunlight Assessment	Delva Patman Redler
Noise Impact Assessment	Applied Acoustic Design
Sustainability Statement	Hurley Palmer Flatt
Energy Statement	Hurley Palmer Flatt
Transport Statement	Peter Brett Associates
Flood Risk Assessment	Mason Navarro Pledge
Draft Construction Management Plan (incorporating construction traffic management)	McLaren Construction Ltd

1.15 This Planning Statement demonstrates that the Scheme:

- Successfully delivers sustainable development of brownfield land within London in line with the overarching approach to development outlined in the NPPF;
- Delivers a development that would contribute positively to the delivery of the vision for Camden and its strategic objectives.
- Brings forward a suitable development which responds to the Site's allocation within the development plan and improves on previous planning applications submitted for this Site.
- Seeks to apply a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the building;
- Delivers a design of high quality architecture that is well-related to the surrounding context and neighbouring buildings;
- Retains the buildings within the site that are considered to be positive contributors to the conservation area and preserves and enhances their architectural and historic character;
- Preserves and enhances the character and appearance of the Bloomsbury Conservation Area and the setting of nearby listed buildings;

- Has the potential to provide an active frontage along New Oxford Street and re-introduces activity along Museum Street;
- The development of 21 high quality residential units and an appropriate contribution towards Affordable Housing Provision is consistent with the strategic objectives of all tiers of planning policy, seeking to promote residential development within accessible locations;
- Optimises the site for additional residential development and minimises potential conflicts that currently exist between existing uses through the removal of sub-standard HMO units and vacant nightclub;
- Contributes to the sustainable travel objectives of national, regional and local planning policy by providing a car free development which promotes other means of travel such as cycling and walking.

1.16 **Section 2.0** of this Statement provides background information on the Site including its planning history. **Section 3.0** sets out the application proposals. **Section 4.0** summarises the planning policy relevant to the Site, and the proposals are assessed against the policies in **Section 5.0**. Draft heads of terms are provided within **Section 6.0** with a summary and conclusions are contained within **Section 7.0**.

## 2.0 SITE LOCATION AND PLANNING HISTORY

### Application Site

- 2.1 The Site is situated within the administrative area of the London Borough of Camden and comprises an area of approximately 853 sqm (0.085 ha) in total. A site location plan and site plan are enclosed with the application submission.
- 2.2 The Site is located with central London and comprises the majority of buildings on an 'island site' / 'urban block' bounded on all sides by roads, including New Oxford Street to the north, Museum Street to the east and West Central Street to the south and west.
- 2.3 A number of buildings are included within the application boundary including:
- **35 – 41 New Oxford Street** – a row of three buildings of four storeys (plus basements), comprising ground floor retail / café with a mix of residential and offices on the upper floors;
  - **10 – 12 Museum Street** – four storey section of the urban block with retail at ground floor (currently vacant) and residential / HMO (Sui Generis) on the upper floors.
  - **16A – 18 West Central Street** – a single building, currently vacant and most recently used as a nightclub (Sui Generis), with offices above.
- 2.4 There are clearly a number of different planning uses contained within the Site, including retail (Class A1), café (Class A3), office (Class B1), residential (Class C3), nightclub (Sui Generis) and HMO (Sui Generis) use.
- 2.5 In terms of the residential use on site, there are a number small units across the site, totalling 26 separate units, some of which are homes in multiple occupation (HMO) of a Sui Generis use.
- 2.6 There is no vehicular access or parking for cars within the Site and none are proposed.

### Heritage Assets

- 2.7 The Site is located within the Bloomsbury Conservation Area, The Bloomsbury Conservation Area Appraisal and Management Strategy (2011) places the Site within Sub Area 8: New Oxford Street / High Holborn / Southampton Row. The area is described in detail in paragraphs 5.127 – 5.128 of the Appraisal.
- 2.8 None of the buildings within the application boundary are listed, although the majority of the buildings are noted as being positive contributors to the character and appearance of the Bloomsbury Conservation Area. The urban block and surrounding area includes a number of listed buildings which are in close proximity. These include:
- 16 West Central Street and 43 - 45 New Oxford Street (Grade II);

- The Bloomsbury Public House (Grade II); and
- Church of St George and Attached Railings, Gates and Lamps (Grade I).

2.9 The Application is supported by a Heritage and Townscape Impact Assessment which describes the site, its heritage context and proposals' contribution to surrounding heritage assets in further detail.

### **Surrounding Area**

2.10 The Site is surrounded by a range of uses, including both residential and non-residential uses. Adjoining the Site:

- To the north is New Oxford Street, opposite which is another urban block comprising retail and restaurants at ground floor with residential / office uses on the upper three to four storeys.
- To the east is Museum Street, opposite which is the former Sorting Office building, which is predominantly vacant and totalling up to seven storeys in height. Planning permission has been granted for its redevelopment. A public house occupies the eastern corner of the urban block, but is not included within the application boundary.
- To the south is a multi-storey car park, which forms a podium level for the Travelodge Hotel which extends up to 17 storeys in height.
- Directly to the north and west is West Central Street which includes the entrance to the multi-storey car park and two four storey buildings comprising a listed public house, offices and residential. 43-45 New Oxford Street is located within the urban block, but not included within the application boundary and is a Grade II listed office building with ground floor retail.

2.11 The surrounding area comprises a large number of uses, commonly found within Central London. In addition to the retail, office and residential uses, notably the British Museum is to the north of the site with the Google headquarters to the west.

2.12 A more detailed description of the Site and surrounding area is provided in the Design and Access Statement prepared by TP Bennett.

### **Accessibility**

2.13 The Site has a Public Transport Accessibility of 6b which is considered to be 'excellent', as it is located in close proximity to a variety of public transport routes.

#### *Rail Accessibility*

2.14 The nearest London Underground station is Tottenham Court Road, located approximately 350m to the west (approximately 4.5 minutes walking time), providing



services on the Central and Northern lines. Furthermore, the Site is 430m from Holborn Underground station, located to the east (approximately 5.5 minutes walking time). This provides access to the Central and Piccadilly lines. Covent Garden Underground station is approximately 550m from the Site.

#### *Bus Accessibility*

- 2.15 The Site is highly accessible to London's bus network. The closest bus stop to the Site is 30m, on New Oxford Street / Bloomsbury Street. There are a further four stops within 500m of the Site, which cumulatively serve around 25 routes across London.
- 2.16 Further information on these routes can be found in the Transport Assessment which supports this Application.

#### **Site and Planning History**

- 2.17 A review of the planning records held by LBC has revealed that there have been a number of applications submitted for the Site, including the redevelopment of the block and development within the individual buildings.
- 2.18 On 25 March 2010 applications for planning permission and conservation area consent were refused by LB Camden (ref. 2009/5460/P and 2009/5463/C) for:

*“Erection of a part 4 and part 8 storey mixed use building to provide offices [2370 sq.m.] (Class B1), replacement nightclub at basement and part ground floor level [West Central Street frontage], retail use (Class A1) at basement and ground floor and 11 x 2 bed residential units (Class C3) on the upper floors (including 4 affordable units) and extensions to 35-37 New Oxford St including a mansard roof.”*

- 2.19 The application has 19 reasons for refusal, the majority of which related to the lack of a legal agreement. Other reasons related to the failure to preserve or enhance the conservation area, the lack of amenity for future residents, affordable housing, and cycle parking provision, plant noise attenuation and impact on antisocial behaviour.
- 2.20 Following the refusal, a further application was submitted in August 2013 aiming to address the reasons for refusal (ref. 2013/4275/P and 2013/4378/C). This sought:

*“Demolition and redevelopment of 16A/B & 18 West Central Street and part demolition, change of use and works of conversion of remaining buildings to replace existing nightclub (Class D2), retail/food and drink (Classes A1-A5) and residential (26 x Class C3 residential studio units) with a new mix of uses comprising retail/food and drink (A1-A3), office (B1) and 19 x residential flats (7 x retained studios, 4 x 1-bed, 7 x 2-bed and 1 x 3-bed) (Class C3) resulting in a net addition of 716sqm gross external floorspace.”*

2.21 Whilst the applications for planning permission and conservation area consent had an officer recommendation for approval, both were refused (on 29 July 2014) by the Planning Committee due to the following reasons:

- Harm to the character and appearance of conservation area due to loss of a building of positive construction;
- Height, bulk, scale, massing, materials and design fails to enhance or preserve CA;
- Loss of nightclub would impact on range of night time leisure activities.

2.22 Subsequent to this refusal, the current Applicant purchased the Site and a new project team were appointed to develop a scheme which would be acceptable in terms of planning policy, taking into consideration the previous comments.

2.23 Whilst of limited relevance, it is noted that in addition to the above, each of the buildings have their own planning history, including various changes of use applications for the ground floor units within the A-class uses, and historic permissions for the upper floor uses.

### 3.0 DEVELOPMENT PROPOSALS

3.1 As set out in **Section 1.0** of this Statement, the Application proposes the partial redevelopment of the existing buildings within this urban block which are to be refurbished and extended to provide residential led-mixed use scheme with a reconfiguration of different uses across the Site.

3.2 The proposed development is envisaged as comprising:

- Replacement of existing substandard ‘homes of multiple occupation’ with 21 residential units (comprising a mix of 7x1 bedroom, 12x2 bedroom and 2x3 bedroom units;
- A minimum of 352 sqm (GEA) of office accommodation;
- 1,055 sqm (GEA) of flexible A1,2,3,4 and/or B1a and/or D1/2 use floorspace at mezzanine, ground and basement level;
- Removal of the vacant nightclub on West Central Street;
- Plant and supporting facilities for the above uses; and,
- Cycle parking spaces.

3.3 During the pre-application and consultation stages, a number of recommendations were offered and subsequent amendments were made to the design of the development, which are identified within the Design and Access Statement.

Land Use		Existing GIA (sq m)	Proposed GIA (sq m)
A1-A3	Retail / Food and Drink	502	0
A1,2,3,4 and/or B1a and/or D1/2	Flexible	0 (See above)	1,055
B1(a)	Office	624	352
C3	Residential	495	2,266
Sui Generis	HMO	97	0
Sui Generis	Nightclub	994	0
	Shared areas, plant	0	435
	<b>TOTAL</b>	2,712	4,108

- 3.4 The existing and proposed floorspaces of each use is detailed in **Table 3.1** above.
- 3.5 As shown in the table above, the proposed scheme removes the existing vacant nightclub, as well as the homes of multiple occupation, which are to be converted to full residential units. Justification for this approach, supported by adopted Plan Policy, is set out in this report.

### **Residential Accommodation**

- 3.6 The scheme proposes a total of 21 residential units, to be located primarily on the upper floors of the scheme, across the site. This replaces 26 existing units, the majority of which are currently substandard in size. A mix of units is provided, including a total of 7 x 1 bed, 12 x 2 bed and 2 x 3 bed units. These include 10% wheelchair accessible units and all of the units proposed accord with Lifetime Homes standards.

### **Commercial Floorspace**

- 3.7 The proposals include a minimum of 352 sqm (GIA) of office floorspace (Class B1a) which comprises the retained office located within 39-41 New Oxford Street. With the proposed flexible use, an additional 1,055m<sup>2</sup> (GIA) of B1a floorspace may be created at basement, mezzanine and ground floor levels. In this case, the scheme would create a net additional 783m<sup>2</sup> of B1a Office floorspace.
- 3.8 The scheme's proposed flexible use floorspace (A1,2,3,4 and/or B1 and/or D1/2) will be located on the basement, ground floor and mezzanine levels. Replacing the existing Sui Generis use (as a night club) and renewing the retail floorspace in this way, will allow for active frontages (potentially in a variety of uses) on New Oxford Street, Museum Street and West Central Street.

### **Parking, Access and Storage**

- 3.9 There is no existing car parking within the site and no further spaces are proposed as part of this Application. The Site is located in an area of excellent public transport accessibility and a 'car free' development is appropriate.
- 3.10 The development proposes 44 cycle spaces to be located within the existing basement. These will be accessed via the internal courtyard, and provide for both the commercial and residential parts of the building in a secure storage facility. These will be provided by 22 two-tier cycle racks.
- 3.11 The existing buildings currently provide limited dedicated cycle storage. This provision will therefore improve the current facilities and further promote sustainable travel.
- 3.12 Due to the nature of the site being an urban block, there are a number of existing access points into the buildings. The majority of these access points will be retained throughout

the site. The Museum Street access to the courtyard will be retained which allows connection to the residential cores and to the basement.

- 3.13 Two of the residential duplexes are accessed from West Central Street. The basement floorspace retains its entrances to the north, east and south facades of the block.
- 3.14 The proposed scheme provides waste and recycling facilities in line with the current requirements. Bins for both general waste and mixed recycling, for both residential and commercial use, will be located in a secure room in the basement, accessed via a lift from the central courtyard. The collection will be made via Museum Street.

## 4.0 PLANNING POLICY FRAMEWORK

4.1 This Application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context, and **Section 5.0** provides an assessment of the Application against the policies and guidance contained within these documents.

### National Guidance

4.2 The National Planning Policy Framework (the “NPPF”) was published on 27 March 2012 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements. The NPPF sets out the Government’s approach to planning matters, and is a material consideration in the determination of planning applications.

4.3 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a ‘golden thread’ running through decision-taking (paragraph14). This paragraph goes onto state that:

*“For decision taking this means:*

- *Approving development proposals that accord with the development plan without delay; and*
- *Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
  - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
  - *specific policies in this Framework indicate development should be restricted.”*

4.4 In March 2014, the Government published the National Planning Practice Guidance (NPPG) which is a material consideration in relation to planning applications. The NPPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level.

### Statutory Framework

4.5 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.

4.6 The Statutory Development Plan for the Site comprises:

- London Plan (consolidated with Alterations since 2011) (2015);
- LB Camden’s Core Strategy (2010);

- LB Camden's Development Policies (2010); and
- LB Camden's Site Allocation Plan (2013).

### **Emerging Policy**

#### *Camden Local Plan*

- 4.7 LB Camden is currently preparing a new Local Plan that will, upon adoption, replace the Core Strategy (2010) and Development Policies (2010) documents.
- 4.8 The plan is in draft form and the local authority undertook an initial round of public consultation until 17 April 2015. The council intends to consult on a revised iteration of the draft Local Plan document later in early 2016 before an examination in public is undertaken to determine if the document is sound. This is anticipated to take place in summer 2016, with adoption later in the year.

#### *Minor Alterations to the London Plan (2015)*

- 4.9 In May 2015, the Mayor published two sets of Minor Alterations to the London Plan for a six week consultation period, on Housing and Parking Standards. These alterations have been prepared to bring the standards in line with the new national housing standards and parking policies.
- 4.10 Notably, these changes affect minimum space standards and other housing standards such as Lifetime Homes, wheelchair accessibility, building regulations and energy emissions. A public examination was held in October 2015 where the proposed alterations were considered by a Planning Inspector.

### **Regional Guidance**

- 4.11 The Greater London Authority (GLA) has published a number of supporting documents that are relevant in the consideration of this Application. Of particular relevance are:
- SPG: Draft Central Activities Zone SPG (September 2015);
  - SPG: Draft Interim Housing (May 2015);
  - SPG: Accessible London: Achieving an Inclusive Environment (October 2014);
  - SPG: Shaping Neighbourhoods: Character and Context (June 2014);
  - SPG: London Planning Statement (May 2014);
  - SPG: Sustainable Design and Construction (April 2014);
  - SPG: Housing (November 2012);
  - SPG: Shaping Neighbourhoods: Play and Informal Recreation (September 2012);
  - SPG: Planning for Equality and Diversity in London (October 2007).

### Local Guidance

4.12 Camden has a number of adopted supplementary planning documents (SPDs) (known as Camden Planning Guidance – CPGs) and other documents which are a material consideration in respect of the Application, including:

- CPG 1 Design;
- CPG 2 Housing
- CPG 3 Sustainability;
- CPG 4 Basements and Lightwells;
- CPG 6 Amenity;
- CPG 7 Transport; and
- CPG 8 Planning obligations.

4.13 It is noted that LBC consulted on amendments to Camden Planning Guidance documents 1, 2, 3 and 4 in March and April 2015.

4.14 The Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011) is also a material consideration in the determination of the Application.

### Site Specific Designations

4.15 The Camden Planning Policy Map outlines that the Site is within

- Site Allocation 18 – Land Bound by New Oxford Street, Museum Street and West Central Street;
- Tottenham Court Road Growth Area;
- Bloomsbury Conservation Area;
- Central London Area;
- London Suburbs Archaeological Priority Area.

4.16 As previously noted, the Site also includes buildings which are non-designated heritage assets, included within the Bloomsbury Conservation Area Appraisal.

4.17 The site's allocation is fundamental to the assessment of the scheme and it states:

***“Mixed use development provided by conversion, extension or partial redevelopment including retail, offices and permanent self-contained (Class C3) residential accommodation at upper levels***

*Development will be expected to:*

- *Optimise the potential of the site to provide new housing (including affordable housing) while minimising potential conflicts between residential and other uses;*



- *Retain and preserve the architectural and historic character of the listed buildings and other heritage assets on the site;*
- *Preserve and enhance the character and appearance of the Bloomsbury Conservation Area, the setting of listed buildings including the British Museum and sustain and enhance the other buildings which positively contribute to the conservation area;*
- *Maintain an active frontage to New Oxford Street;*
- *Make a contribution to improving the public realm providing more pedestrian space in the vicinity of the site, improved crossing facilities across New Oxford Street and better north-south links;*
- *Provide or contribute to the provision of new open space;*
- *Provide infrastructure for supporting local energy generation on site and/or connections to existing or future networks where feasible;*
- *Take account of the key objectives of the adopted planning framework where they remain relevant and up to date.”*

4.18 As a site allocated for residential redevelopment (in part), it forms an important part of Camden Council's five year land supply.

4.19 Paragraph 47 of the NPPF also requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market.

4.20 The site has been assessed as part of this housing land supply to have the capacity for a net additional 11 residential units, in addition to the other uses required by the allocation in its mixed use redevelopment.

## 5.0 PLANNING POLICY ASSESSMENT

- 5.1 Within the section, we assess the component parts of the proposed development against the statutory development plan and other material considerations as outlined in **Section 4.0**.

### **Mixed Use Development**

- 5.2 The principle of mixed-use redevelopment for the Site is clearly established through planning policy guidance at all levels. At the national level, a presumption in favour of sustainable development sits at the heart of the NPPF. It is stated that this should be seen as the ‘golden thread’ running through plan making and decision taking. Furthermore, paragraph 17 of the NPPF identifies a number of core planning principles, including the need for plan-making and decision taking to:

*“promote mixed use developments” and “encourage the effective use of land by reusing land that has previously been developed (brownfield land), provided that it is not of high environmental value”.*

- 5.3 Whilst the Site already comprises a mix of planning uses, the Site is allocated within the Camden Site Allocations (2013) for mixed use development. As set out in the Policy Section above, this is to be achieved through the conversion, extension and partial redevelopment of the urban block and to include retail, offices and permanent self-contained (Class C3) residential accommodation at upper levels.

- 5.4 The Site is located within the Central Activities Zone (CAZ) and within the Tottenham Court Road Growth Area. Under Core Strategy Policy CS1, development will be concentrated in this area and the efficient use of land and buildings is promoted. This will be achieved through:

- *“seeking development that makes full use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;*
- *resisting development that makes inefficient use of Camden’s limited land;*
- *expecting development that will significantly increase the demand of travel to be located in growth areas and other highly accessible parts of the borough;*
- *expecting high density development in Central London, town centres and other locations well served by public transport; and*
- *expecting the provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the borough, including an element of housing where possible.”*

- 5.5 Core Strategy Policy CS2 states that development will be concentrated within Tottenham Court Road where mixed use redevelopment of sites is expected to take place. Development in these areas must maximise site opportunities, provide

appropriate links to, and benefits for, surrounding areas and be in accordance with Council's other planning policies for the area.

- 5.6 Core Strategy Policy CS9 seeks to ensure that development in Central London and the growth areas contributes to London's economic, social and cultural role by supporting the area for the growth of homes, offices and shops.
- 5.7 Policy DP1 requires a mix of uses in development including a contribution towards the supply of housing. In the Central London Area where more than 200sqm of additional floorspace is provided, up to 50% of all additional floorspace should be housing. The proposed development includes an uplift of 1,310 sqm (GEA) of floorspace. The uplift in residential floorspace is 1,962 sqm (GEA) of residential. Policy DP1 would therefore be satisfied.
- 5.8 The mixed use redevelopment of land is continued to be supported in Camden's emerging Local Plan Policies G1 and H2, especially within these existing Growth Areas.
- 5.9 Please refer to 'Land Use Priorities' section below for further analysis of the proposals' position on delivering a number of competing, and even conflicted, land use priorities set out in adopted policy.

#### **Retail / Restaurant / Café Floorspace**

- 5.10 The existing buildings already contain approximately 502 sqm of retail and related A-class floorspace within units which are at ground floor and basement levels. A number of these units are currently vacant and are in need of improvement. The proposals seek the option to re-provide and increase the retail / restaurant / café floorspace within the development to a maximum total of 1,198 sqm.
- 5.11 This is supported by Core Strategy Policy CS7 which seeks to promote retail growth across the borough, especially in the growth areas, such as Tottenham Court Road. The policy also seeks to protect and promote small and independent shops within the Borough.
- 5.12 The site allocation guidance seeks that development maintains an active frontage to New Oxford Street
- 5.13 Camden Policy DP10 encourages the provision of small shop premises suitable for small and independent businesses. The proposals provide up to 1,198 sqm of A class use floorspace with frontages that would be suited to smaller units. With interest coming forward for such units and appropriate subdivision of the floorspace, small retailers could be readily accommodated within the scheme.
- 5.14 The general arrangement of the existing retail frontages on New Oxford Street and Museum Street will be retained, whilst being subject to significant enhancements and refurbishment. The floorspace behind these frontages, as discussed, will be flexible

A1,2,3,4 and/or B1a and/or D1/2 use. In pre-application advice, the Council has advised that all these uses are acceptable in principle, albeit that due to the potential for undue impacts to arise from an overconcentration of A3 uses, this use should be limited to 50% of the proposed basement, ground floor and mezzanine floorspace. The Applicant has agreed with this approach and anticipates the measure being required by condition and/or through the Section 106 legal agreement.

### **Office Floorspace**

- 5.15 In addition to the above, office uses are also retained within the development primarily on the upper floors (402 sqm GEA / 352 sqm GIA). This presents a small net reduction in B1a floorspace, however given that the proposals include B1a as a potential use for the flexible use floorspace at basement, ground and mezzanine levels, the proposals have the potential to maintain the B1a floorspace provision on site, or even increase it.
- 5.16 Core Strategy Policy CS8 seeks to support the borough's industries by safeguarding existing employment sites that meet the needs of modern industries and other employers.
- 5.17 Policy DP13 sets out how the Council will seek to protect existing employment uses in the borough. It advises that:
- *The Council will retain land and buildings that are suitable for continued business use and will resist a change to non- business unless a) it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use;*
  - *When it can be demonstrated that a site is not suitable for any business use other than B1(a) offices, the Council may allow a change to permanent residential uses or community uses, except in Hatton Garden where we will expect mixed use developments that include light industrial premises suitable or use as jewellery workshops.*
- 5.18 DP13 thus acknowledges that there are circumstances in which it is appropriate to release office to residential use.
- 5.19 Camden Planning Guidance 5 (Town Centres, Retail and Employment) provides further guidance to support the above policies.
- 5.20 Paragraph 13.3 in the Camden Development Policies document, and CPG5 provide more detailed criteria by which Camden will assess the acceptability of a loss of employment uses.
- 5.21 Paragraph 13.3 states:

*'When assessing proposals that involve the loss of a business use we will consider whether there is potential for that use to continue, taking into account whether the site:*

- *is located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing;*
- *is in a location suitable for a mix of uses including light industry and local distribution warehousing;*
- *is easily accessible to the Transport for London Road Network and/or London Distributor Roads;*
- *is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water;*
- *has adequate on-site vehicle space for servicing;*
- *is well related to nearby land uses;*
- ***is in a reasonable condition to allow the use to continue;***
- *is near to other industry and warehousing, noise/vibration generating uses, pollution and hazards;*
- *provides a range of unit sizes, particularly those suitable for small businesses (under 100sqm).'*

5.22 The thrust of the above criteria is clearly geared towards the assessment of light industrial / warehouse operations, however the point regarding 'reasonable condition to allow the use to continue' is of particular relevance here.

5.23 As mentioned above, the proposals will retain the majority of existing B1a floorspace within the site, approximately 352 sqm. Again, it is noted that the flexible use floorspace proposed within the scheme could also include B1a use, therefore potentially creating an increase.

5.24 The existing floorspace across the site was assessed against the criteria set out above. As a result of this assessment areas of floorspace were found to be in a condition that allowed the B1a use to continue, in accordance with the criterion highlighted. Other parts however were found to fail this test having been neglected for many years and having been denied the investment required to keep pace with increasing demands of modern office occupiers.

5.25 Paragraph 7.4 of CPG 5 adds to the criteria for assessing the suitability of employment space for continued use, stating:

*'There are a number of considerations that we will take into account when assessing applications for a change of use from office to a nonbusiness use, specifically:*

- *the criteria listed in paragraph 13.3 of policy DP13 of the Camden Development Policies [Discussed above];*
- ***the age of the premises. Some older premises may be more suitable to conversion;***

- *whether the premises include features required by tenants seeking modern office accommodation;*
- ***the quality of the premises and whether it is purpose built accommodation. Poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion;***
- ***whether there are existing tenants in the building, and whether these tenants intend to relocate;***
- *the location of the premises and evidence of demand for office space in this location; and,*
- ***whether the premises currently provide accommodation for small and medium businesses.'***

5.26 In addition to the generally very poor condition of the existing buildings, the above criteria also take into account inherent features of buildings that may mean they are more appropriate for conversion. The relevant criteria are highlighted above and discussed in turn below.

#### *Age and Quality of Premises*

5.27 It is important to note that the existing B1a floorspace that could be retained and made to work successfully in future, has been retained. However, some of the existing B1a floorspace that may be lost as part of this development scheme is, by virtue of its age and design, inherently unsuitable for modern office accommodation. Without total demolition and redevelopment, this space could not provide appropriate and viable office space. This is in part evidenced by the fact that parts of the accommodation are currently vacant and have not been let for a several years.

#### *Existing Tenants*

5.28 The criteria above also consider the presence of existing tenants.

5.29 The majority of the existing floorspace has been vacant for several years and only two tenants remain insitu. A ground floor retail tenant is in occupation currently however their intention is to leave subject to lease negotiations that are anticipated to conclude shortly. The second tenant, a photographic studio, located within the best of the office space on the site that fronts New Oxford Street, intends to stay. The proposals therefore do not affect this floorspace and have been specifically designed to cater for their continued, uninterrupted, occupation.

#### *Small and Medium Sized Business*

5.30 The existing accommodation does not provide for the occupation of small and medium sized businesses. As discussed above, even with subdivision, the accommodation is substandard and could not provide for the successful running of even a small or medium size business without very significant, and likely financially unjustifiable, investment.

- 5.31 In light of the above analysis, the Applicant is of the view that the possibility of a loss of a small amount of office floorspace on this site is justified in these circumstances. Again, we note that were demand is forthcoming the proposals seek a use that would allow the site to in fact deliver an uplift in B1a office space and as such is considered to offer the best solution in the circumstances.
- 5.32 Again, please refer to 'Land Use Priorities' section below for further analysis of the proposals' position on delivering a number of competing, and even conflicted, land use priorities set out in adopted policy.

#### **Replacement of Nightclub with 'commercial' floorspace**

- 5.33 Extensive consultation has been undertaken with the Council, ward members, local stakeholders, neighbours and the public with regard to the night club and whether this should be removed or retained on the site. Whilst a previous planning application to redevelop the site was refused in part on the basis that it proposed the loss of the Night Club (ref. 2013/4275/P and 2013/4378/C above), all parties consulted, including Ward Councillors, agree that the loss of the night club space is justified on amenity impact grounds.
- 5.34 The nightclub is currently vacant and when operational was a nuisance for neighbours both within the Site and adjacent to the block with noise disturbance and antisocial behaviour. Following consultation, it was considered that all stakeholders were against the retention of the nightclub, including the Council's environmental health officers.
- 5.35 The principle of the loss of the nightclub is also welcomed by the Council's planning officers and is therefore considered to be acceptable and a benefit to the local area. The nightclub is not considered to be a "community use" and therefore Policy DP15 should not apply.
- 5.36 As noted above, the former night club space forms part of proposed flexible use floor space proposed and so can be replaced by a variety of acceptable uses.

#### **Residential Development**

- 5.37 The proposed residential development accords with the current thrust of planning policy at national, regional and local level, which places an emphasis on achieving sustainable development. In particular, adopted plan policy is extremely clear that housing is the priority land use in Camden.
- 5.38 Housing delivery is also one of the core NPPF objectives and it advocates policy that seeks to significantly boost the supply of housing (paragraph 47). Furthermore, the NPPF states that "*housing applications should be considered in the context of the presumption in favour of sustainable development*".

- 5.39 Paragraph 47 of the NPPF also requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market.
- 5.40 London Plan Policy 3.3 (Increasing Housing Supply) states that there is a "*pressing need for more homes in London*". Part D of the policy states that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing targets through the intensification of brownfield housing sites and mixed use redevelopment, including of surplus commercial capacity.
- 5.41 Table 3.1 of the London Plan identifies an annual target of 889 new homes per annum in Camden (8,892 total to 2025), which reflects an increased target as part of the Further Alterations to the plan in 2015.
- 5.42 At the local level, Core Strategy Policy CS1 expects that 12,250 additional homes will be provided within Camden between 2010/11 and 2024/25. This equates to a lower annual target than the latest London Plan figures, of 816 dwellings per annum.
- 5.43 Policy CS2 notes that the borough's Growth Areas are expected to provide 4,700 new homes, with a minimum of 1,000 within Tottenham Court Road between 2001 and 2026.
- 5.44 Emerging Local Plan Policy H1 seeks to continue the maximisation of housing supply within the Borough, regarding self-contained housing as a priority, under Policy H2.
- 5.45 The principle of prioritising the delivery of housing over other uses and maximising that deliver has long been established as acceptable in Camden.
- 5.46 The existing site comprises 26 residential units comprising bedsits and studios. A number of these units are Houses of Multiple Occupation. During the consideration of previous planning application for the site, the council Officers and Committee Members have agreed that these units are below the minimum size requirements for a HMO.
- 5.47 In addressing these substandard units, by replacing them with appropriately sized one bed flats, the proposals would reduce the units on site to 21 (please refer to the Design and Access Statement's Accommodation and Area Schedules).
- 5.48 Policy DP2 seeks to minimise the loss of housing by resisting developments that would involve the net loss of two or more homes, unless they:
- *“create large homes in a part of the borough with a relatively low proportion of large dwellings,*
  - *enable sub-standard units to be enlarged to meet residential space standards,*  
*or*



- *enable existing affordable homes to be adapted to provide the affordable dwelling sizes that are most needed.*”

- 5.49 Camden Policy DP9 states that the Council will resist development that involves the net loss or self-containment of bedsit rooms or other housing of shared facilities unless it can be shown that the existing provision is incapable of meeting the relevant standards for HMOs and the proposed development provides housing which accords with other policies within the development plan. This Policy is due to be replicated within the emerging Local Plan (under Policies H3 and H7).
- 5.50 Given that the proposed development creates larger homes (increasing the overall residential floorspace within the site) and enables sub-standard HMO units to be converted into space standard compliant C3 residential units, the application complies with the requirements of Policy DP2 and DP9.
- 5.51 Pre-application advice received implies Officers support this position and this is consistent with the views of officers and Committee Members in their determination of previous application (ref. 2013/4275/P and 2013/4378/C). That scheme proposed the same loss of units for the same reasons and whilst ultimately refused, the loss of units did not form part of the application's reasons for refusal. Indeed, the Officer's Committee report it was reported that the Council, through its Private Sector Housing Team noted that the units within 10-12 Museum Street were below current HMO standards and itself suggested the amalgamation of units is likely the best option of providing accommodation of sufficient quality. It is reasonable to assume therefore that the loss was considered acceptable under Policy DP2 and DP9 at that time and continues to be so currently in the absence of materially altered policy or material considerations.

#### **Land Use Priorities**

- 5.52 Camden's Development Plan contains a number of policies promoting particular land uses. Often, within the context of delivering sustainable and financially viable development, these policies compete with one another and may even be mutually irreconcilable so that in a particular case one must give way (at least in part) to the other(s). In addition, many of the provisions of development plans are framed in language whose application to a given set of facts requires the exercise of judgement.
- 5.53 This scheme is one such case. Accepting the necessity of financial viability and that the proposed scheme's height, bulk, mass (and thus floorspace) is the maximum acceptable in planning terms, the scheme's ability to meet fully with the various land use and physical requirements set out in adopted policy is not possible.
- 5.54 Firstly, officers have been clear that the proposals' height, bulk and mass (and thus floorspace) is the maximum acceptable in planning terms. The proposed floorspace can therefore not be increased acceptably (primarily for townscape and heritage impact reasons) nor be decreased for reasons of not making full and efficient use of brown field land.

- 5.55 This set level of floorspace must therefore then be divided between various acceptable land uses to best address the competing requirements of the development plan.
- 5.56 Camden state that their priority land use is residential. Indeed as stated previously the site is allocated for residential redevelopment (in part) and therefore forms an important part of Camden Council's five year land supply.
- 5.57 Paragraph 47 of the NPPF also requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market.
- 5.58 The site has been assessed as part of this housing land supply to have the capacity for a net additional 11 residential units, in addition to the other uses required by the allocation in its mixed use redevelopment.
- 5.59 Competing with the requirement of providing 11 additional residential units is Camden's in principle resistance to the loss of B1a office space and the insistence that retail uses are provided on the lower floors. In this case, and particularly within the maximised floorspace proposed, it is not possible to deliver all the residential space sought and retain all the existing B1a Office space and provide retail across the lower floors. This is a point of practicality and we note there may be further implications concerning financial viability that will necessarily influence what land use mix is possible also.
- 5.60 The applicant, with the advice of their planning consultants and Camden's planning officers, has exercised necessary judgement in assessing what in the best combination of land uses in planning terms.
- 5.61 Housing, in accordance with Camden's clear policy position and national government imperative, has been given priority such that the scheme delivers as much residential floorspace as possible. This level of provision has been tempered by Camden's aspiration to retain B1a floorspace, though as the existing B1a floorspace is demonstrably substandard and that the proposed flexible use could result in new B1a floorspace, the risk of a small (272 sqm) loss of B1a floorspace is considered the best possible approach.
- 5.62 Whilst providing for residential and office space in this way, the scheme also allows for active retail frontages at lower levels.
- 5.63 On balance therefore, the proposals' land use mix is considered to be acceptable in planning terms.

**Residential Density**

- 5.64 London Plan Policy 3.4 (Optimising Housing Potential) seeks to optimise housing density, having regard to local context, design principles and public transport accessibility.
- 5.65 The optimum density ranges are set out within London Plan Table 3.2, known as the ‘sustainable residential quality density matrix’. The site has a Public Transport Accessibility Level of 6b and is in a central location, being within 800 yards of a ‘Major town centre’. The density matrix sets out that the appropriate range should be between 650-1100 habitable rooms per hectare and 140-405 units per hectare.
- 5.66 The GLA Housing SPG (2012) (and Interim version – 2015) requires the density of new residential development in accordance with the London Plan. When proposed density levels are above those set out in the Plan, the SPG states that account should be taken of aspects such as ‘liveability’ related to the proposed mix, design quality, physical access to services, long term management of communal areas and the wider context of the proposal including its contribution to place shaping.
- 5.67 The SPG notes that it is particularly important to take account of the impact of the proposed development in terms of massing, scale and character in relation nearby uses. In addition, design is expected to be of an exemplary standard.

**Table 5.1 – GLA Density Calculation**

Area	
Total Floorspace	4,108 sq m
Non-residential floorspace	1,842 sq m
Percentage of residential floorspace within scheme	55%
Site area	0.085 hectares
Area of site allocated to residential (at 55%)	0.047 hectares

- 5.68 The development provides a total of 21 residential units and 58 habitable rooms on a site which is 0.085 hectares (proportionate 0.47 hectares of residential). Using the table above the development is calculated to provide 1,234 habitable rooms per hectare and 447 units per hectare using the GLA’s density calculation.
- 5.69 Whilst this is above the upper range identified by the London Plan density matrix, the scheme has been designed to the highest quality, taking into account the context of the surrounding area. In terms of the local context, the Site benefits from being in close proximity to local retail, commercial, and leisure amenities, as well as excellent transport links.

- 5.70 The development has been carefully designed in order to optimise the density of development in line with planning policy objectives, whilst ensuring that it does not represent overbearing or dominating development. As confirmed by the London Plan, the density matrix is not meant to be prescriptive, instead serving as a tool to allow for judgements to be made about accessibility (and hence development densities), with PTAL ratings intended to inform those judgements rather than act as an empirical limit.
- 5.71 Having regard to the tests of local context, design and public transport accessibility, the proposed density is considered to be wholly appropriate in consideration of the London Plan density matrix.

### **Housing Unit Mix**

- 5.72 National planning policy contained in the NPPF requires new development to deliver sustainable, inclusive and mixed communities in accessible locations. To achieve mixed communities, the NPPF advises that a variety of housing should be provided in terms of size, type, tenure and price and also a mix of different households such as families with children, single person households and older people.
- 5.73 Policy 3.8 (Housing Choice) of the London Plan seeks to ensure that new residential developments comprise a mix of unit sizes to address the housing needs of the local area. The policy does not, however, specify a precise mix of housing types.
- 5.74 At the local level Camden's Policy DP5 seeks to ensure that all residential developments contribute to meeting the priorities set out in the Dwelling Size Priorities Table and expects a mix of large and small homes in all residential developments. For market housing, the table sets out that two-bed units are of 'very-high priority', with an aim of 40% two-bed units within developments.
- 5.75 Emerging Policy H7 seeks to update the above policy, noting that two-bed units would, in future, be classified as 'medium priority', with three-bed units, the 'high priority'.
- 5.76 The application proposes the provision of 21 units, seven of which are to be provided as one bed units (33%), 12 to be provided as two bed units (57%) and two to be provided as a three bed unit (10%). This has been formulated in consideration of the character of the development, the site size and the viability / demand for certain types of homes. Overall, this meets the aim of Policy DP5 with regard to the provision of two-bed units and is considered to accord with the development plan.

### **Housing Design**

- 5.77 London Plan Policy 3.5 (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. The policy adds that the design of new dwellings should take account of "factors relating to 'arrival' at the building and

the 'home as a place of retreat', have adequately sized rooms and convenient and efficient room layouts".

- 5.78 The policy also states that LDFs should incorporate minimum space standards that generally conform to Table 3.3 of the London Plan. We note that these minimum space standards are due to be updated as part of the 2015 Minor Alterations to the London Plan, although we do not consider that this would affect the scheme as the proposed units are above both the existing and emerging minimum space standards. Schemes should also be compliant with regard to the Nationally Described Space Standards (NDSS), introduced by the Government.
- 5.79 The accommodation schedule showing the size of each unit is outlined in the Design and Access Statement, in accordance with the NDSS and London Plan.
- 5.80 Additionally, the Mayor's Housing SPG (November 2012) sets out a requirement for a minimum of 5 sqm of private outdoor space that should be provided for 1 – 2 person dwellings and an additional 1 sqm for each additional occupant (Standard 4.10.1).
- 5.81 At the local level, Camden's Policy DP26 requires development to provide an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space. Developments should also provide facilities for bicycle storage, storage, recycling and disposal of waste. Outdoor space for private or community amenity space, should also be provided, wherever practical.
- 5.82 Due to the constraints of the site, it is not possible for each individual flat to benefit from individual private amenity space. Alternatively, the Scheme proposes a roof terrace for communal use by residents. The inner courtyard is also to be retained. This is not uncommon on a dense urban site where buildings front the street line. During pre-application discussions, this was considered to be acceptable by officers.
- 5.83 Local Policy DP6 states that all housing development should meet lifetime homes standards and 10% of homes should either meet wheelchair housing standards or be easily adapted to meet them.
- 5.84 The main blocks will be step-free throughout, with two wheelchair compliant lifts provided ensuring inclusive access. An appraisal of the Scheme against lifetime home criteria and its approach to inclusive design is provided within the Design and Access Statement.

### **Affordable Housing**

- 5.85 Paragraph 50 of the NPPF states that local planning authorities should, where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing

housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities.

- 5.86 Policy 3.11 in the London Plan requires Boroughs to set an affordable housing target having regard to housing need assessments and a realistic assessment of supply.
- 5.87 Policy 3.12 in the London Plan emphasises that a range of factors must be considered when assessing the level of affordable housing on a particular proposal. It states that:
- 'A) the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:*
- a) current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8 and 3.10 and 3.11*
  - b) affordable housing targets adopted in line with Policy 3.11*
  - c) c) the need to encourage rather than restrain residential development (Policy 3.3)*
  - d) d) the need to promote mixed and balanced communities (Policy 3.9)*
  - e) the size and type of affordable housing needed in particular locations*
  - f) the specific circumstances of an individual site.'*
- 5.88 Policy 3.12 of the London Plan states that affordable housing negotiations on sites should take account of individual circumstances including development viability.
- 5.89 Paragraph 3.73 goes on to explain that the Mayor seeks to encourage, not restrain, overall residential development and that Boroughs should take a reasonable and flexible approach to securing affordable housing on a site by site basis. Paragraph 3.74 outlines that in some cases it may be acceptable for affordable housing provision to be provided off site or through a payment in-lieu of provision.
- 5.90 Camden Core Strategy Policy CS6 states that the Council will seek to negotiate on the basis of a 50% affordable housing target for each development, whilst taking into account factors which it considers to affect the suitability of the site.
- 5.91 Development Policies Document Policy DP3 states that the Council *'The Council will negotiate the development of individual sites and related sites to seek the maximum reasonable amount of affordable housing on the basis of an affordable housing target of 50% of the total addition to housing floorspace, but will apply the target with regard to a sliding scale from 10% for developments with capacity for 10 dwellings to 50% for developments with capacity for 50 dwellings.'*
- 5.92 In providing an additional circa 2,100 sqm of residential floorspace, the affordable housing target would be 21%.
- 5.93 Development Policies Document Policy DP3 also states that the council will consider a number factors when determining whether an affordable housing contribution should be sought and nature of the contribution that would be appropriate. These factors include:

- access to public transport, workplaces, shops, services and community facilities;
- the character of the development, the site and the area;
- site size, and constraints on including a mix of market and affordable tenures;
- the economics and financial viability of the development including any particular costs associated with it;
- the impact on creation of mixed and inclusive communities; and,
- any other planning objectives considered to be a priority for the site.

5.94 The toolkit and Affordable Housing Strategy submitted in parallel with this application under separate cover demonstrate it is not financially viable to provide affordable housing on or off site at any level. Therefore, in accordance with the London Plan, and Camden Council adopted policy set above a financial contribution is considered to be appropriate.

5.95 Again for further detailed justification of this position please refer to the Toolkit and Affordable Housing Strategy submitted under separate cover (due to commercial sensitivities).

### **Design Principles**

5.96 High quality and inclusive design is encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development, and should contribute positively to making places better for people. Part 7 of the NPPF outlines the requirement for good design and sets out that development should:

- *“Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
- *Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
- *Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
- *Are visually attractive as a result of good architecture and appropriate landscaping.”*

5.97 Chapter 7 of the London Plan sets out the Mayor’s policies on a number of issues relating to London’s places and spaces. Policy 7.2 (An Inclusive Environment) requires all new development in London to achieve the highest standards of accessible and inclusive design, while Policy 7.4 (Local Character) states that “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". Part D of Policy 7.6 (Architecture) states that buildings and structures should "not cause unacceptable harm to the amenity of surrounding land and buildings".

- 5.98 The GLA has also published Supplementary Guidance to the London Plan. SPG: Achieving an Inclusive Environment provides detailed advice and guidance on providing inclusive design in London.
- 5.99 At the local level, Camden's Development Policy DP24 requires all development to be of the highest standard of design and will expect developments to consider:
- a) *"character, setting, context and the form and scale of neighbouring buildings;*
  - b) *the character and proportions of the existing building, where alterations and extensions are proposed;*
  - c) *the quality of materials to be used;*
  - d) *the provision of visually interesting frontages at street level;*
  - e) *the appropriate location for building services equipment;*
  - f) *existing natural features, such as topography and trees;*
  - g) *the provision of appropriate hard and soft landscaping including boundary treatments;*
  - h) *the provision of appropriate amenity space; and*
  - i) *accessibility."*
- 5.100 LB Camden also has specific design policies relating to shopfronts, and it is expected under Policy DP30 that a high standard of design will be required. This includes considering the design, the existing character, the general characteristics of shopfronts within the vicinity and the relationship with the upper floors of the building.
- 5.101 Further planning policies that promote Camden as a safer place, and recognises the need to incorporate design principles which contribute to this, are contained within adopted and emerging development plan documents and guidance.
- 5.102 A comprehensive Design and Access Statement prepared by TP Bennett is submitted in support of the Application. This document sets out in detail an evaluation of the Scheme's design and the manner in which this has progressed as a result of the consultation undertaken.
- 5.103 The Scheme has been designed to follow the Victorian style of the original buildings and ensure that the new features are sympathetic to the retained facades, as well as the context, style and scale of the surrounding Bloomsbury area. Overall, the scheme has been designed to a high quality, both in terms of the residential and commercial space proposed.



## Heritage

5.104 Paragraph 128 of the NPPF states that:

*“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”*

5.105 The buildings within the Site are not listed, although are considered to be local buildings of merit by LB Camden. The site is also located within the Bloomsbury Conservation Area and is within the setting of a number of listed buildings adjacent to or in the vicinity.

5.106 NPPF Paragraph 132 notes that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be.

5.107 London Plan Policy 7.8 states that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

5.108 Core Strategy Policy CS14 seeks to ensure that Camden’s places and buildings are attractive, safe and easy use through the preserving and enhancing of the borough’s heritage assets and their settings including conservation areas, listed buildings and archaeological remains.

5.109 Policy CS9 specifically seeks to preserve and enhance Central London’s historic environment.

5.110 Camden’s Policy DP25 also seeks to conserve the borough’s heritage and in order to maintain the character of the conservation area, the Council will:

- a) *“take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;*
- b) *only permit development within conservation areas that preserves and enhances the character and appearance of the area;*
- c) *prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;*
- d) *not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and*

e) *preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.*"

- 5.111 In addition to the above, development will not be permitted if it is considered that it would cause harm to the setting of nearby listed buildings. The Council also protects remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting.
- 5.112 Emerging Policy D2 (Heritage) is a broad policy which states the Council's continued commitment to the preservation and, where appropriate, enhancement of the Borough's heritage assets and their settings.
- 5.113 A Heritage and Townscape Assessment has been prepared to assess the proposals in light of its impact on surrounding heritage assets.
- 5.114 It is recognised that these proposals present an opportunity to enhance the significance of the Conservation Area in line with paragraph 137 of the NPPF. The assessment shows that the proposed changes to the buildings improve the contribution they make to the character and appearance of the Conservation Area and setting of the listed buildings in the vicinity.
- 5.115 The proposals also take the opportunity to reverse features which currently have a negative impact on the area. The West Central Street frontages are in particularly poor condition and the proposals will significantly enhance the aesthetic appearance of these buildings and this façade. Other works including the restoration of historic shopfronts and reinstatement of fenestration details provides further enhancements.
- 5.116 The proposals have been designed in response to the Site Allocation which encourages development proposals to maximise the potential of the site whilst retaining the character of the existing historic buildings. Overall, the proposals are considered to meet the statutory tests by enhancing the setting of nearby listed buildings as well as enhancing the character and appearance of the Conservation Area.

### **Residential Amenity**

- 5.117 Locally, Core Strategy Policy CS5 states that the Council will protect the amenity of residents and those working and visiting in the borough by making sure the impact of development is fully considered on the occupiers and neighbours. Mitigation measures are required where necessary. Residential communities are supported by Policy CS9 by protecting amenity.
- 5.118 Further detailed Policy DP26 protects the quality of life of occupiers and neighbours by only granting permission that does not cause harm to amenity. The factors which the Council will consider are:

- a) *“visual privacy and overlooking;*
- b) *overshadowing and outlook;*
- c) *sunlight, daylight and artificial light levels;*
- d) *noise and vibration levels;*
- e) *odour, fumes and dust;*
- f) *microclimate;*
- g) *the inclusion of appropriate attenuation measures.”*

5.119 The above policy is reproduced in the Emerging Local Plan under Policy A1, further highlighting the necessity for development to protect residential amenity and manage the impact of development.

5.120 Further guidance on the application of the Council’s amenity policies is contained within the relevant supplementary guidance documents, including CPG1 (Design) and CPG6 (Amenity).

5.121 Camden Policy DP12 seeks to ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. To achieve this, the Council will consider the impact of uses on nearby residential uses and amenity and consider the impacts of this use including noise, fumes and crime.

5.122 The juxtaposition of residential and potentially impactful commercial uses within the proposals has been carefully considered by the applicant and officers during pre-application negotiations.

5.123 It is considered that A3 uses pose the greatest potential to impact on residential amenity and as such the extent of that use will be limited to just 50% of the basement,, ground and mezzanine levels. In addition, any A3 and any other retail use for that matter, will be made the subject of conditions that require strict and appropriate opening hours to be observed as well as detailed Management Plans to be agreed with the Council and strictly adhered to.

5.124 The applicant is agreeable to all such measures being made a requirement of the an y Section 106 Agreement also, in the expectation that this will afford both the Council and neighbours of the seriousness with which these matters are taken by the applicant.

5.125 In this way, we are of the view that no undue impact on residential amenity will result from the proposals and the uses within, in accordance with Policies CS5, DP12 and DP26.

#### *Air Quality*

5.126 London Plan Policy 7.14 provides regional planning policy on improving air quality and states that development proposals should promote sustainable design and construction

to reduce emissions from the demolition and construction of buildings. Further guidance is provided in the Mayor's supplementary planning guidance.

- 5.127 Policy CS16 seeks to improve health and well-being in Camden and recognises the impact of poor air quality within the borough. It is noted that the whole borough has been declared an Air Quality Management Area (AQMA).
- 5.128 Detailed policy is provided within Policy DP32 and its supporting text, which expects mitigation measures within developments which are situated in areas of poor air quality.
- 5.129 An Air Quality Assessment has been prepared by Peter Brett Associates which forms part of this Application, and considers the suitability for residential and commercial development on Site and the impact of construction.
- 5.130 The report concludes that long-term and short-term nitrogen oxide objectives are predicted to be exceeded and therefore mitigation will be required for the building. Further mitigation is proposed to alleviate construction impacts.

#### *Noise*

- 5.131 Under Policy DP28, the Council will seek to ensure that noise and vibration from development is controlled and managed. The Council will seek to minimise the impact on local amenity from the demolition and construction phases. This policy is replicated in the emerging Local Plan policy A4.
- 5.132 An Acoustic Report accompanies this application that concludes that with the adoption of the proposed measures, the proposed site can be developed whilst complying with national guidance and local planning policy for internal noise levels, building vibration, and services plant noise emission.

#### *Daylight / Sunlight*

- 5.133 The proposed scheme increases the bulk of the existing buildings, and therefore a Daylight and Sunlight Study has been prepared by Delva Patman Redler as part of this Application. This assesses the impact of the development on the neighbouring residential amenity of buildings adjacent to the Site.
- 5.134 The report sets out details of tests undertaken in accordance with the BRE Report 209 'Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice' (second edition, 2011).
- 5.135 It daylight analysis demonstrates that, generally, the overall quality, quantity and distribution of light will remain BRE compliant, despite some minor infringements. The sunlight analysis also demonstrates the impact on neighbouring rooms will remain BRE compliant.

- 5.136 Where there are infringements it is considered that the daylight and sunlight effects measured are not sufficiently adverse so as to make the light in rooms within the neighbouring properties unacceptable for their purpose given the dense urban centre of the site.
- 5.137 Overall, it is therefore considered that the proposed Scheme is acceptable and would not adversely impact on the light levels or neighbouring amenity of adjacent occupiers.

### **Transport**

- 5.138 Section 4 of the NPPF sets out the Government's policies with regard to transport. Para. 32 sets out the requirement for all developments that generate significant amounts of movement to be supported by a Transport Statement. It is also stated (para. 34) that *"plans and decisions should ensure developments that generate significant movements are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised"*.
- 5.139 Chapter 6 of the London Plan provides the regional guidance for transport. Policy 6.1 (Strategic Approach) seeks to encourage the *"closer integration of transport and development"*, while supporting *"development that generates high levels of trips at locations with high public transport accessibility and/or capacity"*.
- 5.140 Policy 6.10 aims to bring about a significant increase in walking, by improving the quality of the pedestrian and street environment.
- 5.141 At the local level, Core Strategy Policy CS11 is the primary transport policy which promotes the availability of sustainable transport choices to support growth, reduce environmental impact of travel, and relieve pressure on the transport network.
- 5.142 In order to support Camden's growth and promote walking, cycling and public transport, the Council will continue to improve facilities for cyclists including increasing the availability of cycle parking.
- 5.143 This is supported by detailed Policy DP16 which seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. This is also promoted under Policy DP17, which resists development that is dependent on travel by private motor vehicles.
- 5.144 A Transport Assessment has been prepared by Peter Brett Associates and forms part of this Application. Overall, it is unlikely that the proposals will have a significant impact on the transport network given the relatively small change in trip generation. Potential delivery and servicing trips can also be accommodated with minimal impacts on the network.

- 5.145 With the loss of the nightclub, the scheme represents a significant improvement with regard to evening and night-time trips. The nightclub would have generated a significant amount of trips, including taxi movements, at unsociable hours.
- 5.146 The development is considered to be fully in accordance with the policy at the national, regional and local level.

*Car Parking*

- 5.147 The NPPF requires Local Authorities to consider parking provision within new developments based upon the accessibility of the development and the opportunities for public transport, whilst recognising that there is a need to reduce the use of high emissions vehicles.
- 5.148 Policy 6.13 (Parking) of the London Plan aims to achieve an appropriate balance between promoting new development and preventing excessive car parking provision.
- 5.149 Locally, Policy CS11 aims to minimise provision for private parking in new developments particularly through either car free developments in the borough's most accessible locations or car capped developments.
- 5.150 Detailed Policy DP18 notes that for car free and car capped developments, the Council will:
- a) *“Limit on-site car parking to:*
    - *Spaces designated for disabled people;*
    - *Any operational and servicing needs; and*
    - *Spaces designated for the occupants of development specified as car capped.*
  - b) *Not issue on-street parking permits; and*
  - c) *Use a legal agreement to ensure that future occupants are aware they are not entitled to on-street parking permits.”*

- 5.151 The application site has a Public Transport Accessibility Level of 6b which is considered to be excellent. The site is within walking distance of a number of public transport services, including bus routes and the London Underground. No car parking is provided on site, and a car-free development is considered to be acceptable given the site's excellent accessibility.
- 5.152 The Transport Statement identifies a number of disabled parking spaces within 160m of the Site. Given that these are not suitably close, further discussions will be held with the Council to understand appropriate locations on-street to provide disabled parking for the development.

### *Cycle Parking*

- 5.153 Both the NPPF and the London Plan promote cycling in locations which can be made sustainable.
- 5.154 London Plan Policy 6.9 encourages new development to contribute to the increase of cycling through the provision of cycling parking facilities. The cycling parking requirements were recently increased as part of the alterations to the London Plan in 2015. These seek 1 space to be provided for studio and one-bed units and 2 spaces per all other dwellings. In addition to the above, there should be 1 space per 40 units for visitors.
- 5.155 Developments that promote cycling is encouraged throughout the development plan. Policy DP18 states that developments will be expected to meet the Council's minimum space standards for cycle parking, although it is noted that these are lower than the London Plan standards.
- 5.156 The development provides a total of 44 long-stay cycle parking spaces, in the form of 22 two-tier cycle racks. These are provided in line with the latest London Plan standards, with 35 provided for residents, four for the office, and the remaining five spaces for the use by the remaining flexible uses across the Site.
- 5.157 Necessary short-term cycle parking is proposed to be agreed with LB Camden during the determination of the planning application and secured by planning condition.

### **Energy and Sustainability**

- 5.158 The NPPF seeks to ensure the delivery of renewable or low carbon energy developments in order to address Climate Change and achieve environmental sustainability through improving biodiversity and minimising waste.
- 5.159 London Plan Policy 5.2 (Minimising Carbon Dioxide Emissions) states that development proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the 'be lean, be clean, be green' energy hierarchy. It seeks a 40% improvement in carbon reductions over 2010 Building Regulations for new residential buildings between 2013 and 2016.
- 5.160 However, in April 2014, the Mayor produced its Sustainable Design and Construction SPG which outlined that a 35% carbon reduction target beyond Part L 2013 Building Regulations will be applied. These targets primarily apply for major developments and therefore are not necessarily relevant in the context of this application.
- 5.161 Furthermore, the emerging Minor Alterations seeks to amend Policy 5.2 in line with the new SPG guidance. For residential buildings, there would be a minimum improvement on 2013 Regulations between 2014 and 2016 of 35%. These targets should be met through a combination of energy efficiency measures on-site, and low and zero carbon

infrastructure, either on or off-site in line with other energy policies. In 2016 and beyond, zero carbon targets will be implemented.

- 5.162 At the local level, Core Strategy Policy CS13 requires all development to take measures to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation by:
- a) *“ensuring patterns of land use that minimise the need to travel by car and help support local energy networks;*
  - b) *promoting the efficient use of land and buildings;*
  - c) *minimising carbon emissions from the redevelopment, construction and occupation of buildings by implementing, in order, all of the elements of the following energy hierarchy:*
    - 1. *ensuring developments use less energy,*
    - 2. *making use of energy from efficient sources, such as the King’s Cross, Gower Street, Bloomsbury and proposed Euston Road decentralised energy networks;*
    - 3. *generating renewable energy on-site; and*
  - d) *ensuring buildings and spaces are designed to cope with, and minimise the effects of, climate change.”*
- 5.163 Under Policy DP22, the Council requires development to incorporate sustainable design and construction measures and must demonstrate how sustainable design principles and measures have been incorporated into the design and proposed implementation. Schemes must also incorporate green or brown roofs wherever suitable.
- 5.164 The above policy expects developments of 500sqm / 5 units or more to achieve “excellent” in EcoHomes assessments. It also expects non-residential developments of 500sqm or more to achieve “very good” in BREEAM assessments (“excellent” from 2016).
- 5.165 Policy CS13 has regard to water and surface water flooding and aims to make sure development incorporates efficient water infrastructure. Policy DP23 supports this by requiring developments to reduce their water consumption by incorporating water efficient features and equipment and reducing the impact on the sewer network.
- 5.166 An Energy Strategy has been prepared by Hurley Palmer Flatt and forms part of this Application.
- 5.167 The total predicted regulated carbon dioxide savings is anticipated to be 99.5 tonnes when equated to a saving, when compared against the existing building, of a **65.4% reduction** in regulated emissions.



- 5.168 In terms of landscaping, the proposal will include extensive green roofs on both flat roof areas above the residential blocks, as indicated within the Design and Access Statement.
- 5.169 Overall, it is considered that the proposed scheme accords with the relevant planning policy and guidance with regard to energy and sustainability at all tiers.

#### **Subterranean Works and Construction**

- 5.170 Camden's Policy DP27 states that basement developments will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. Developers are required to demonstrate methodologies appropriate that
- a) *"maintain the structural stability of the building and neighbouring properties;*
  - b) *avoid adversely affecting drainage and run-off or causing other damage to the water environment;*
  - c) *avoid cumulative impacts upon structural stability or the water environment in the local area."*
- 5.171 The Council will then consider whether the proposals harm the amenity of neighbours, protect archaeological remains or harm the appearance or setting of the property or established character of the surrounding area.
- 5.172 Extensive guidance is provided in Camden Planning Guidance 4 (CPG4) on Basements and Lightwells which was produced in July 2015. A Basement Impact Assessment has been prepared by Mason Navarro Pledge to accompany the application and be in accordance with the Council's policy and guidance on this matter.
- 5.173 A Basement Impact Assessment (BIA) has been prepared by Mason Navarro Pledge and submitted as part of this Application. This document concludes that the proposals accord with all policy requirements and that the scheme is therefore acceptable in this regard.

#### **Construction Management Plan**

- 5.174 In accordance with adopted plan policy and Camden Planning Guidance, a draft Construction Management Plan has been submitted with this application. McLaren's document demonstrates how construction impacts will be minimised, in relation to site activity during works and the transport arrangements for vehicles servicing the Site.
- 5.175 We note that this draft document will be progressed to a final version should planning permission be permitted. As is usual in Camden, this is likely to be the requirement of clause in the Section 106 legal agreement.

### **Community Infrastructure Levy**

- 5.176 Within this assessment, consideration is given to the Mayoral CIL requirements which came into effect on 1 April 2012. The rate for LB Camden is set at £50 per sqm.
- 5.177 In addition to the above, LB Camden adopted its Community Infrastructure Charging Schedule in March 2015 which was applied from 1 April 2015. This outlines a rate of £150 per sqm rate for residential developments (Class C3) in the 'Central Zone' of the Borough, if more than 10 dwellings (or 1,000 sqm) are proposed. A CIL Form has been submitted which outlines the relevant information for the scheme.

## 6.0 SECTION 106 HEADS OF TERMS

- 6.1 Under S106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in their land for the purpose of restricting or regulating the development or use of the land. In accordance with Regulation 122 of the CIL regulations, a planning obligation must be:
- a) “Necessary to make the proposed development acceptable in planning terms;
  - b) Directly related to the proposed development; and
  - c) Fairly and reasonably related in scale and kind to the proposed development.”
- 6.2 Paragraph 203 of the NPPF states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Paragraph 205 states that where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. Paragraph 206 states that planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.
- 6.3 LB Camden adopted its Planning Obligations guidance (CPG8) in July 2015 and identifies the kinds of planning applications that will require planning obligations. The application proposals trigger a number of thresholds and a Section 106 Agreement is therefore proposed.
- 6.4 Core Strategy Policy CS19 states that the Council will use planning obligations and other suitable mechanisms, where appropriate, to:
- *“Support sustainable development,*
  - *Secure any necessary and related infrastructure, facilities and services to meet needs generated by development, and*
  - *Mitigate the impact of development.”*
- 6.5 Accordingly, it is anticipated that obligations arising out of this development would include the following Heads of Terms:
- Affordable Housing;
  - Sustainability;
  - Construction Management
  - Public Open Space;
  - Public Realm and Highways.

## 7.0 CONCLUSIONS

- 7.1 The Application Proposals to which this Statement relates seek the refurbishment and extension of the existing buildings to deliver a mixed use residential and commercial scheme.
- 7.2 The Planning Statement has assessed the proposals against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act.
- 7.3 The proposals have been formulated in accordance with the NPPF, the adopted London Plan, the LBC Core Strategy, LBC Development Policies and LBC Site Allocations Plan.
- 7.4 The Site is allocated within the London Borough of Camden (“LBC”) Site Allocations Plan for mixed use development through the conversion, extension and partial redevelopment of the Site.
- 7.5 The proposed development is considered to accord with the relevant policies of the adopted and emerging development plan, as well as being consistent with national planning policy.
- 7.6 The proposals have been developed as part of pre-application discussions with LB Camden and consultation with the public and local councillors. As a result, scheme changes have been incorporated to respond to comments received.
- 7.7 Having regard to the assessment undertaken within this Statement, we consider the planning benefits arising from this scheme can be summarised as follows:
- Successfully delivers sustainable development of brownfield land within London in line with the overarching approach to development outlined in the NPPF;
  - Delivers a development that would contribute positively to the delivery of the vision for Camden and its strategic objectives.
  - Brings forward a suitable development which responds to the Site’s allocation within the development plan and improves on previous planning applications submitted for this Site.
  - Seeks to apply a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the building;
  - Delivers an appropriate collection of buildings of high quality architecture that is well-related to the surrounding context and neighbouring buildings;

- Retains the buildings within the site that are considered to be positive contributors to the conservation area and preserves and enhances their architectural and historic character;
- Preserves and enhances the character and appearance of the Bloomsbury Conservation Area and the setting of nearby listed buildings;
- Retains an active frontage along New Oxford Street and re-introduces activity along Museum Street;
- The development of 21 high quality residential units is consistent with the strategic objectives of all tiers of planning policy, seeking to promote residential development within accessible locations;
- Optimises the site for additional residential development and minimises potential conflicts that currently exist between existing uses through the removal of sub-standard HMO units and vacant nightclub;
- Contributes to the sustainable travel objectives of national, regional and local planning policy by providing a car free development which promotes other means of travel such as cycling and walking.

