

May 2015

Planning Statement

Philcol Properties Ltd

Downing Court, Grenville Street, London



Contents

Executive Summary	2
1 Introduction.....	3
2 The site, its surroundings and planning history.....	5
3 The proposals and pre-application consultation.....	7
4 Relevant planning policy and other material considerations.....	9
5 Justification for planning permission.....	16
6 Conclusions.....	21
Appendix 1 – Copy of LBC’s pre-application response (8 May 2012)	22
Appendix 2: Public consultation leaflet	23

Executive Summary

This report has been prepared for Philcol Properties Ltd. It provides the planning justification in support of a planning application for full planning permission.

It relates to a single storey rooftop extension to provide 2 x 2 bed residential flats with private terraces and associated replacement plant at Downing Court on Grenville Street, WC1. The building is currently 6 storeys (plus basement) and comprises some 25 flats. Existing roof plant will be removed and replaced with the extension, above which replacement plant will be contained within a lantern enclosure. Design measures seek to ensure that the extension is subservient to the existing building, appropriate for the application site's location within Bloomsbury Conservation Area and to limit its visibility from street level.

The proposals put forward have been the subject of on-going discussion with the London Borough of Camden. The development is of a high quality design. Existing residents and the local community groups (including the Bloomsbury Conservation Area Committee, the Brunswick Group and Marchmont Street Association) have been given the opportunity to comment and input into the proposals during public consultation.

We are of the view that the proposals accord with the relevant development plan and ask that planning permission is granted.

1 Introduction

- 1.1 This Planning Statement has been prepared by JLL on behalf of Philcol Properties Ltd ('the applicant').
- 1.2 It concerns the proposed rooftop development on Downing Court on Grenville Street (WC1) ('the application site'), which will provide two new 2 bed residential units.
- 1.3 It is our view that the proposal accords with the relevant development plan and that as such permission should be granted. This is because section 36(8) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 1.4 This document provides the planning background to the application site, summarises the proposals and then outlines how these comply with the relevant planning policies. It should be considered alongside all of the other documents comprising the planning application package (see below for details of the format of submission).
- 1.5 This Planning Statement is structured as follows:
- Section 2 describes the site, its surroundings and planning history;
 - Section 3 summarises the proposals and includes a Statement of Community Involvement explaining the pre-application consultation;
 - Section 4 sets out relevant planning policy and other material considerations;
 - Section 5 explains the justification for planning permission; and
 - Section 6 provides the conclusions.

Description of development

- 1.6 Planning permission is sought for,

"A single-storey rooftop extension to provide 2 x residential flats with private terraces, together with replacement water tanks and replacement twin fan extraction fans to be located within a lantern enclosure above the main roof."

Format of submission

- 1.7 This planning application comprises:
- Planning application form and ownership certificates;
 - Application drawings – including:
 - Site location plan at 1:1250 (Drawing No. 312.PL.001);
 - Site block plan at 1:500 (Drawing No. 312.PL.002);
 - Proposed 6th Floor Plan (Drawing No. 312.PL.003);
 - Proposed Roof Plan (Drawing No. 312.PL.004);
 - Basement Floor Plan with Proposed Cycle and Refuse Provision (Drawing No. 312.PL.005);
 - Proposed Bernard St. Elevation (Drawing No. 312.PL.006);

- Proposed Grenville St. Elevation (Drawing No. 312.PL.007);
 - Proposed South Elevation (Drawing No. 312.PL.008);
 - Proposed West Elevation (Drawing No. 312.PL.009);
 - Proposed Section AA (Drawing No. 312.PL.010);
 - Proposed Section BB (Drawing No. 312.PL.011);
 - Proposed Section CC (Drawing No. 312.PL.012);
 - Proposed Section DD (Drawing No. 312.PL.013);
 - Proposed Section EE (Drawing No. 312.PL.014);
 - Proposed Typical Detailed Sections (Drawing No. 312.PL.015);
 - Proposed Typical Detailed Elevation (Drawing No. 312.PL.016);
 - Existing 5th Floor Plan (Drawing No. 312.PL.017);
 - Existing 6th Floor Plan (Roof) (Drawing No. 312.PL.018);
 - Existing Street Elevations (Drawing No. 312.PL.019);
 - Existing Rear Elevations (Drawing No. 312.PL.020); and,
 - Proposed Basement Floor Plan with Cycle and Refuse provisions (Drawing No. 312.PL.02).
- Design and Access Statement (McDowell + Benedetti);
 - Daylight / Sunlight Report (Savills);
 - Construction Management Plan (JLL);
 - Heritage Statement (KMHeritage);
 - Acoustic Assessment (Hann Tucker Associates);
 - CIL form.

2 The site, its surroundings and planning history

The site

- 2.1 The application site (0.0693ha) is situated within the administrative boundary of the London Borough of Camden (LBC).
- 2.2 The building currently on site dates from the inter-war period and comprises a 6 storey (plus basement) L-shaped block of some 25 flats. It is located at the corner of Grenville Street and Bernard Street.
- 2.3 The building is not listed but is noted to be a positive contribution within the Bloomsbury Conservation Area. It is of brick construction with a rendered ground floor; the front elevations comprise multi-coloured brickwork with lighter buff brick on the rear elevations. The existing rooftop is flat with a plant room housing a lift overrun and water tanks.
- 2.4 The main entrance to the block is provided from Grenville Street and there is a shared central core with a lift and stairs. A separate escape stair is located in the west wing.
- 2.5 There is a yard to the rear of the building, accessed via a ramp off the Colonnade that runs between Grenville Street and Herbrand Street.
- 2.6 The basement includes 4 car parking spaces, as well as areas for plant and storage and a 2 bed, self-contained flat.
- 2.7 The application site is well connected to public transport and has a Public Transport Accessibility Level (PTAL) of 6a (on a scale of 1-6 where 6 is the highest). It is within 160m walking distance of Russell Square Underground Station (Piccadilly line) and is served by numerous bus routes, including No.s 59, 68, 91, 168, 188, N91 and X68.

The surrounding area

- 2.8 The building lies in an area comprising a mix of uses. This includes residential, student accommodation at International Hall (located opposite the application site across Grenville Street), commercial uses, hotels, retail including The Brunswick Centre (located opposite the application site across Bernard Street), nearby hospitals such as Great Ormond Street Hospital (located west of the application site along Bernard Street) and cultural amenities such as The Foundling Museum fronting Brunswick Square Gardens.
- 2.9 Building heights along Grenville Street range between 4-6 storeys and vary in age and quality. There is no common vernacular.
- 2.10 There are several listed buildings within the application site's vicinity, including The Brunswick Centre (Grade II), No.s 11 – 24 and 27 Bernard Street (Grade II) and No.s 75 – 82 Guildford Street (Grade II).

Planning History

The site

- 2.11 We have reviewed LBC's online planning register and the majority of records relate to minor applications for tree works between 1987 and 1999. In the table below we summarise the planning applications relating to the basement flat which was created from areas previously used for storage.

LPA Reference	Proposal	Status and comments
2012/2291/P	Renewal of planning permission Ref. 2008/4096/P (see below) for conversion of basement storage areas to a 2-bed, self-contained flat	Granted 14 December 2012
2008/4096/P	Conversion of basement storage areas to a 2-bed, self-contained flat and installation of windows at basement level to Bernard Street and Grenville Street.	Granted 20 July 2009

LPA Reference	Proposal	Status and comments
2007/1427/P	Conversion of basement storage to form a 2-bed self-contained flat, including new stairs and an extension.	<p>Refused 25 June 2007</p> <p>Reason for refusal:</p> <ul style="list-style-type: none"> - Proposed infilling would be detrimental to the appearance and setting of the building.

3 The proposals and pre-application consultation

Proposal

- 3.1 The proposal is for a single storey rooftop extension (134 sq m net additional area) to provide two new 2 bed flats (75 and 76 sq m respectively).
- 3.2 The full details of the proposed scheme are provided in the accompanying Design & Access Statement and drawings. However in summary, it comprises:
- An extension which is set back from the existing parapet on all sides except at the south-facing rear wall where the existing wall at roof level is retained. These setbacks have continuous planters all round behind the parapet.
 - Private terraces of 26 sq m and 45 sq m for each new flat.
 - New concealed plant areas to accommodate repositioned, replacement water tanks.
 - The removal of the existing maintenance access stair.
 - The development will be car-free.
 - Secure racks for 14 bicycles will be provided at the rear courtyard for existing and new residents, accessed from the existing vehicle ramp.
 - Access from the existing entrance from Grenville Street, with the common stair extended to provide access to the new flats.
 - An extension of the existing boiler chimney at the south rear corner of the building to meet current standards.
 - High quality design which complements the existing building, whilst also being subservient to it, utilising high quality materials, and minimising scale and massing to limit visibility, even from a distance.
 - A green roof.

Statement of Community Involvement

Pre-application consultation with LBC

- 3.3 A formal pre-application meeting was held with Officers on 8 May 2012 to discuss the proposals and site specific considerations. At this stage the proposal was for a part 1, part 2 storey roof extension to provide 3 x 2 bed flats, increasing the overall floor area by 255 sq m.
- 3.4 Officers advised that the principle of additional residential units was policy compliant and that the proposed units would accord with the Council's residential standards in terms of size and daylight. They added that it would be unreasonable to expect the proposed units to meet all Lifetime Homes criteria, given site constraints, and that any future application should be accompanied by a Lifetime Homes Statement.
- 3.5 Officers also noted the following:
- There is a high need for 2 and 3 bed flats in private developments, which the proposals should take into consideration.
 - A single extra storey is considered the maximum additional massing and height that could be introduced on this site in order to prevent any detrimental impact on the character or appearance of this part of the Conservation Area and the setting of the nearby Listed Buildings.

- It is unlikely that the proposed scheme would raise amenity issues in terms of unacceptable overlooking and loss of daylight to the neighbouring properties. Potential overlooking from the terraces would need to be addressed as part of any future planning application.
- Adequate provision should be made for refuse and recycle storage.
- The new units would be required to be car free given the site's high public transport accessibility; one cycle space per unit is required.
- Although the scheme falls below the threshold to require an Eco-homes Assessment, some sustainability measures could be incorporated into the design, for example solar panels and green roofs.
- A Construction Management Plan should accompany the planning application.

3.6 As noted in section 3 of the accompanying Design and Access Statement, the proposals have evolved and been amended to reflect these discussions, to ensure that the proposed development is both of a high quality design and appropriate for its context and location. This includes reducing the proposed extension to a single storey.

3.7 A copy of LBC's written response is included in Appendix 1.

Existing Downing Court residents and local amenity groups

3.8 In November 2014 public consultation leaflets were sent to all existing Downing Court residents, local amenity groups and Ward Councillors. These set out the development proposal and gave those consulted the opportunity to comment on and input into the design.

3.9 A copy of the public consultation leaflet is included in Appendix 2.

3.10 Four responses were received from existing Downing Court residents, primarily objecting to the principle of development and highlighting management / construction concerns. In order to address these concerns a Construction Management Plan (CMP) accompanies this planning application explaining how construction impacts will be managed and minimised.

3.11 No responses were received from the following local amenity groups, except for The Marchmont Street Association who asked for an update on progress:

- The Bloomsbury Conservation Area Advisory Committee;
- The Brunswick Group;
- The Marchmont Street Association.

3.12 No responses were received from Councillors Francis or Madlani. Councillor Harris responded only to advise that it would be better to liaise with Councillors Francis and Madlani given that he is on the Planning Committee.

4 Relevant planning policy and other material considerations

- 4.1 This section provides an overview of national, regional and local planning policies relating to the planning application as well as other material considerations. It looks at factors relevant to the creation of new residential development, including design issues.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise. Other material considerations include items such as national planning policy guidance or statements, up-to-date research and / or site specific reasons.
- 4.3 Section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that where there is a difference in policy, the most recently adopted policy takes precedence.
- 4.4 The statutory development plan applicable to the application site comprises:
- Further Alterations to the London Plan (FALP, March 2015);
 - LBC’s Core Strategy (CS, 2010); and
 - LBC’s Development Policies Document (DP, 2010).
- 4.5 Regard should also be had to the Government’s National Planning Policy Framework (NPPF, 2012) and LBC’s Bloomsbury Conservation Area Appraisal and Management Strategy (2011), Camden Planning Guidance (CPG) 1 Design (September 2014), CPG2 Housing (2013), CPG Sustainability (2011) and CPG 7 Transport (2011).

Application site designations

- 4.6 The application site falls within the following designations:
- Central Activities Zone (CAZ);
 - LBC’s Central London Area (Clear Zone Region);
 - LBC’s Highly Accessible Area;
 - Bloomsbury Conservation Area, where it is noted as a building of positive contribution (but not listed);
 - The background of a designated view, specifically London Panorama: Greenwich Park, 5A.2 Greenwich Park Wolfe stature to Tower Bridge (Right Lateral Assessment Area).

National Planning Policy Framework (NPPF, March 2012)

- 4.7 The National Planning Policy Framework (NPPF) sets out the Government’s commitment to sustainable economic growth and requires Local Planning Authorities (LPA) to approach decision-making positively and proactively. LPAs are thus expected to apply the presumption in favour of sustainable development.

Housing

- 4.8 With regard to housing, LPAs are expected to be able to identify a 5-year housing supply, plus a 5% buffer, as well as broad locations for housing growth for the next 15 years where possible (para 47).

- 4.9 Para 49 requires housing applications to be considered in the context of the Framework's overarching emphasis on the presumption in favour of sustainable development.

Design

- 4.10 In relation to design, para 59 stipulates that design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access. Para 60 further adds that "[p]lanning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles".

Heritage

- 4.11 With regard to the historic environment, the Framework stipulates that the weight attached to the importance of a heritage asset should be proportionate to the significance of that asset (para 129). Applicants are encouraged to describe this significance, including any contribution made by their setting (para 128).

Regional planning policy

Further Alterations to the London Plan (FALP, March 2015)

- 4.12 The Further Alterations to the London Plan (FALP, March 2015) sets out the London Mayor's strategic aspirations for development in London to 2036. Local plans are expected to be in general conformity with these policies, which are by their very nature more generalised than those adopted by individual boroughs like LBC.

Housing

- 4.13 Delivering housing is a London Mayoral priority use and LBC is targeted to deliver a minimum of 889 new units per annum, totally 8,892 new units by 2025 (FALP Policy 3.3). This is an increase of 34% compared to the target specified in the now superseded 2011/13 London Plan.
- 4.14 Housing potential is expected to be optimised and a density matrix is provided to guide development in particular locations (FALP Policy 3.4). The application site sits within a 'central' location, defined as areas with very dense development, a mix of different uses, large building footprints typically of 4 – 6 storeys and within 800m walking distance of an International, Metropolitan or Major town centre. It has a PTAL of 6a, for which the FALP matrix suggests densities of between 650 – 1100 hr/ha.
- 4.15 FALP Policy 3.8 expects local authorities to ensure delivery of a range of housing sizes and types to accommodate need. This includes that all new housing is built to 'The Lifetime Homes' standards and that 10% of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users (FALP Policy 3.8).
- 4.16 While FALP Policies 3.11 and 3.12 look to maximise affordable housing, the proposals fall below any policy thresholds to provide this.

Design

- 4.17 Residential development is expected to adhere to minimum internal space standards and to be of the highest quality, relating to their context and to the wider environment (FALP Policy 3.5 – see Table 3.3 below).

FALP Table 3.3 minimum space standards

	Dwelling type (bedroom (b)/persons-bedspaces (p))	GIA (sq m)
Flats	1p	37
	1b2p	50
	2b3p	61
	2b4p	70
	3b4p	74
	3b5p	86
	3b6p	95
	4b5p	90
	4b6p	99
	2 storey houses	2b4p
3b4p		87
3b5p		96
4b5p		100
4b6p		107
3 storey houses	3b5p	102
	4b5p	106
	4b6p	113

- 4.18 Development proposals are expected to be of an inclusive, high quality architectural design which take into account the characteristics of the surrounding neighbourhood (FALP Policies 7.1, 7.2, 7.6, GLA Housing Design Guide (2010)).
- 4.19 FALP Policy 7.4 expects development to provide a high quality design response that has regard to the pattern and grain of existing spaces and streets in orientation, scale, proportion and mass, makes a positive contribution and is informed by the surrounding historic environment.
- 4.20 There is also a general expectation that development will be designed to be secure, safe and accessible (FALP Policy 7.3).

Amenity provision, including playspace

- 4.21 Housing proposals are expected to make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs (FALP Policy 3.6).

Heritage and view management

- 4.22 FALP Policy 7.8 requires development affecting heritage assets and their setting to conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 4.23 Development proposals in the background of a view should give context to landmarks and not harm the composition of the view as a whole (FALP Policy 7.12). The policy continues, stating that development within designated London Panoramas should be managed so that it fits within the prevailing pattern of buildings and spaces without detracting from the panorama as a whole, and affording strategically important landmarks an appropriate setting.
- 4.24 The London Mayor's London View Management Framework Supplementary Planning Guidance (SPG, 2012) further adds that development within the view background for London Panorama: Greenwich Park should preserve or enhance the existing level of definition for the dome and upper parts of the western towers of St Paul's Cathedral.

Sustainability

- 4.25 Development is expected to minimise carbon dioxide emissions in accordance with the London Mayor's energy hierarchy (FALP Policy 5.2). The policy stipulates that residential buildings are expected to deliver a 40% improvement on 2010 Building Regulations to 2016. Where feasible, this reduction should be through the use of on-site renewable energy (FALP Policy 5.7).
- 4.26 There is a general expectation that development proposals demonstrate that sustainable design standards are integral to the proposal, including its construction and operation (FALP Policy 5.3).
- 4.27 Whilst development proposals are expected to evaluate the feasibility of Combined Heat and Power (CHP) systems, the energy hierarchy listed in FALP Policy 5.6 is targeted to major development proposals only. Similarly FALP Policy 5.9 (Overheating and Cooling) relates only to major development proposals.
- 4.28 Green infrastructure is encouraged within development proposals, including green roofs and soft landscaping (FALP Policy 5.10), with FALP Policy 5.11 listing green roof and development site objectives in relation to major development proposals.
- 4.29 Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to manage water run-off in line with the London Mayor's drainage hierarchy (FALP Policy 5.13). Adequate wastewater infrastructure capacity must also be available (FALP Policy 5.14) and development should minimise the use of mains water (FALP Policy 5.15).

Parking

- 4.30 Development is expected to provide secure cycle parking facilities (FALP Policy 6.9). Table 6.2 specifies minimum cycle parking standards, comprising 2 spaces per 2+ bed unit (FALP Policy 6.13).
- 4.31 Maximum parking standards are also specified, of less than 1 per unit for 1 – 2 bed units (FALP Policy 6.13).

Local Planning Policy

LBC Core Strategy 2010-2025 (CS, 2010)

- 4.32 LBC's Core Strategy (CS, 2010) sets out the key elements of the Council's planning vision and strategy for the Borough to 2025.

Development approach

- 4.33 CS Policy CS1 requires developments to make full use of their site, having regard to the character of the surroundings, sustainability, amenity, heritage and transport accessibility. High density developments are expected to be located in Central London and other locations with high public transport accessibility.
- 4.34 Specifically with regard to highly accessible areas, CS Policy CS3 identifies these locations for a mix of uses including housing.
- 4.35 There is a general expectation that amenity will be protected, taking into account the impact of development on occupiers and neighbours and requiring mitigation measures where necessary (CS Policy CS5).

Central London

- 4.36 Central London is posited as a focus for Camden's future growth, including for residential (CS Policy CS9).

Housing

- 4.37 Housing is regarded as Camden's priority land use and LBC seeks to maximise housing delivery, meeting or exceeding (now superseded) London Plan housing targets (CS Policy CS6). The policy specifies a borough-wide affordable housing target of 50%, split 60:40 between social rented and intermediate; the maximum reasonable amount of affordable housing will be negotiated subject to site circumstances.

Design, heritage and view management

- 4.38 It is expected that design will be of high quality and preserve and enhance Camden's heritage assets (CS Policy CS14). This includes protecting important views of St Paul's Cathedral.

Parking

- 4.39 Car free development is encouraged within the Borough's most accessible locations (CS Policy CS11).

Sustainability

- 4.40 All development is required to minimise the effects of, and adapt to, climate change through the incorporation of the highest feasible, viable environmental standards. This includes promoting the efficient use of land and buildings, minimising carbon emissions and ensuring water efficiency (CS Policy CS13).
- 4.41 CS Policy CS18 expects developments to include facilities for the storage and collection of waste and recycling.

LBC's Development Policies Document (DP, 2010)

- 4.42 LBC's Development Policies Document (DP, 2010) sets out detailed policies which expand on the overarching policies contained within LBC's Core Strategy.

Housing

- 4.43 DP Policy DP2 seeks to maximise the supply of additional homes in the Borough.
- 4.44 With regard to affordable housing, policy thresholds are for 10+ residential units and therefore not applicable to the proposals.
- 4.45 There is an expectation that housing type will contribute to meeting specified priorities, taking into account issues like the character of the development, site size and viability (DP Policy DP5). Demand for 2 bed market housing is identified as 'very high'.
- 4.46 All development is expected to meet lifetime homes standards, with 10% to either meet wheelchair standards, or be easily adapted to meet them (DP Policy DP6).

Design

- 4.47 DP Policy DP24 reflects the requirements of CS Policy CS14, specifically that development be of the highest standard of design. It states that where roof alterations and extensions are proposed, developments should consider the character and proportions of the existing building. Regard should also be had to the character, setting, context, form and scale of neighbouring buildings.
- 4.48 DP Policy DP26 seeks to manage the impact of development on occupiers and neighbours. It lists factors for consideration, including visual privacy and overlooking, sunlight, noise, internal accommodation standards and provision of outdoor amenity space.
- 4.49 DP Policy DP29 sets out the Council's expectation that development will be as accessible as is practical.
- 4.50 LBC's Camden Planning Guidance (CPG) provides additional information in respect of the Council's expectations for how development should come forward; these are material considerations.
- 4.51 CPG1: Design (September 2014) is a material consideration and stipulates that, when proposing roof alterations and extensions, the main considerations should be: 1) scale and visual prominence; 2) effect on the established townscape and architectural style; 3) effect on neighbouring properties.

- 4.52 The Guidance further highlights when additional storeys are likely to be acceptable, including where alterations are architecturally sympathetic and where further development would not cause additional harm. Conversely, roof additions are unlikely to be considered acceptable where:
- There is an unbroken run of valley roofs;
 - Groups of buildings have a roof line that is largely unimpaired by alterations / extensions;
 - There is already an additional storey;
 - An additional storey would add significantly to the bulk, overwhelm the scale or unbalance or undermine the architectural composition;
 - Buildings exposed to important London-wide and local views from public spaces;
 - Buildings where roof construction or form are unsuitable for roof additions such as shallow pitched roofs with eaves.
- 4.53 CPG2: Housing (2013) sets out LBC's residential development standards. LBC's overarching approach is that development should provide high quality housing that provides secure, well-lit accommodation with a well-designed layout. It is expected that all residential development should meet the 16 criteria that form the Lifetime Homes standards, but Wheelchair Housing Standards only apply to development of 10+ units.
- 4.54 CPG6: Amenity (2011) provides information on all types of amenity issues, such as daylight and sunlight, overlooking and construction management plans.

Sustainability

- 4.55 DP Policy DP22 encourages the inclusion of sustainable design and climate change adaptation measures in any scheme. This includes incorporating green roofs wherever suitable.
- 4.56 Development is expected to reduce water consumption, the pressure on the combined sewer network and the risk of flooding (DP Policy DP23).
- 4.57 LBC's CPG3: Sustainability provides further information on ways to achieve carbon reduction and more sustainable development.
- 4.58 The Council will only grant permission for plant or machinery if it can be operated without cause harm to amenity and does not exceed LBC's noise thresholds (DP Policy DP28).

Parking

- 4.59 LBC's parking standards have now been superseded by the FALP (see above for details) but DP Policy DP18 stipulates that development proposals within Central London and other Highly Accessible Areas are expected to be car free (DP Policy DP18).

Heritage

- 4.60 DP Policy DP25 only permits developments within conservation areas that preserve and enhance the character and appearance of the area. It adds that proposals that could cause harm to the setting of listed buildings will be resisted.

Bloomsbury Conservation Area Appraisal and Management Strategy (BCAAMS, 2011)

- 4.61 The Bloomsbury Conservation Area Appraisal and Management Strategy (2011) identifies the key management issues for the Bloomsbury Conservation Area. It is a material consideration in determining relevant planning applications.
- 4.62 The application site falls within Sub Area 12: Coram's Fields / Brunswick Centre. This is described as being dominated by large scale, green open spaces of historic significance in and around Coram's Fields, with a predominance of institutional

use (hospital, university, education), recreational and community uses with secondary residential and office uses. Downing Court is noted to be a positive contributor.

5 Justification for planning permission

- 5.1 This section considers the key issues relating to the proposals in the context of relevant national, regional and local planning policy, as well as material considerations.
- 5.2 The following issues are key to the application and are considered in turn below:
- (a) The principle of additional housing on the application site;
 - i. Housing mix;
 - ii. Affordable housing;
 - (b) The acceptability of a rooftop extension in this location;
 - i. Design;
 - ii. Residential amenity, including internal design and amenity provision;
 - iii. Neighbouring amenity, including sunlight /daylight and privacy;
 - (c) The impact on heritage assets, specifically the Bloomsbury Conservation Area, nearby listed buildings and the designated view;
 - (d) Parking;
 - (e) Sustainability;
 - (f) Noise;
 - (g) Planning obligations.
- (a) The principle of additional housing on the site**
- 5.3 The application site is centrally located, in an area which includes a broad mix of uses encompassing commercial, residential, retail, cultural and hotel uses. Growth is directed precisely to this location, including for residential (CS Policy CS9).
- 5.4 The proposal is therefore entirely appropriate in respect of the proposed land use.
- 5.5 This was confirmed by Officers during pre-application discussions, who stated that the creation of new flats complied with CS Policies CS1 and CS6, and DP Policy DP2.
- 5.6 It is also important to note the ever-increasing emphasis on housing delivery within planning policy. This is a spatial priority, and the Further Alterations to the London Plan (FALP, March 2015) increase LBC's housing target by 34%.
- (i) **Housing mix**
- 5.7 The proposal is for 2 x 2 bed flats. This complies with LBC's 'very high' requirement for 2 bed flats in private developments (DP Policy DP5) and also accords with Officer advice during pre-application discussions.
- (ii) **Affordable housing**
- 5.8 The proposals fall below policy thresholds for affordable housing provision, meaning that this is not relevant in this instance.

5.9 Given all of the above, residential use in this location is considered acceptable in planning policy terms.

(b) The acceptability of a rooftop extension in this location

(i) Design

- 5.10 The proposed design has been informed by site characteristics, its setting and the policy aspiration to deliver a high quality design which responds sensitively to the character of its surroundings. It has evolved through pre-application discussions with Officers.
- 5.11 DP Policy DP24 expects roof extensions to consider the character and proportions of the existing building (DP Policy DP24). Further guidance is also set out in section 5 of LBC's Camden Planning Guidance: 1 Design (CPG1, September 2014), stipulating that additional storeys are likely to be acceptable where alterations are architecturally sympathetic and where further development would not cause additional harm.
- 5.12 As explained in the accompanying Design & Access Statement, the proposals have been carefully designed to complement the existing building, whilst also being subservient to it, utilising high quality materials and minimising scale and massing to limit visibility, even from a distance.
- 5.13 The detailed design and choice of materials have been carefully selected in consultation with a heritage consultant and will be hard wearing. The timber screening is proposed to provide privacy and solar shading and will assimilate with the colour of the proposed cladding and existing brickwork of Downing Court.
- 5.14 Furthermore, the proposed extension is set back on all sides except at the south facing rear wall where the existing wall at roof level is retained. These set backs have continuous planters all round behind the parapet so that it does not result in an increased sense of enclosure, especially on Colonnade, and maintains privacy both for the occupants and neighbouring residents.
- 5.15 We address the criteria identified within CPG1 for instances where roof additions are unlikely to be considered acceptable in turn below:
- a) *There is an unbroken run of valley roofs*
- 5.16 The existing roofline of the block is not uniform; therefore, this proposal will not result in the unacceptable breaking of an impaired roof line.
- b) *Groups of buildings have a roof line that is largely unimpaired by alterations / extensions*
- 5.17 Downing Court sits on the corner of Grenville Street and Bernard Street, overlooking Brunswick Square; an additional storey would be in keeping with the scale of its surroundings.
- c) *There is already an additional storey*
- 5.18 There is no existing additional storey; the roof is currently occupied by an unsightly plant room. This proposal replaces the existing plant room with a high quality and sensitively considered design.
- 5.19 Following Officer advice during pre-application discussions, the second storey originally proposed has been removed. The resulting single storey is subordinate in character and is proportionate to the scale of the existing and neighbouring buildings. Height around the eaves level is kept low so that the overall scale of the extension has the minimum impact and it will not be prominent from the street level.
- d) *An additional storey would add significantly to the bulk, overwhelm the scale or unbalance or undermine the architectural composition*
- 5.20 To reiterate, the roof top extension will be subordinate and proportionate to the scale of the existing and neighbouring buildings. Downing Court is located on a corner site and overlooks Brunswick Square. There are already buildings of considerable bulk and height in the surrounding area, such as The Brunswick Centre, International House and a series of

tall buildings on Guilford Street and Russell Square. The proposed extension is therefore entirely appropriate to this location.

e) Buildings exposed to important London-wide and local views from public squares

5.21 The design responds to the composition and symmetry of the existing building. Projecting central bays on the Bernard and Grenville Street sides are set back less than the rest of the perimeter, and align with the existing central pair of projecting bay windows on each elevation below. This is intended to anchor the roof extension to the existing building and create an appropriate top as viewed against the skyline. The proposal is therefore considered suitable and appropriate to its location.

5.22 Further consideration is given to the designated view below.

f) Buildings where roof construction or form are unsuitable for roof additions such as shallow pitched roofs with eaves.

5.23 The existing roof is flat and the building's concrete-encased steel frame includes load-bearing masonry piers. The property is suitable for roof additions.

(ii) Residential amenity, including internal design and amenity provision

5.24 The proposed residential units exceed internal minimum space standards and will be finished to a high level of specification. Both units are at least tri-aspect and include private amenity space in the form of terraces.

5.25 Officers confirmed during pre-application discussions that it would be unreasonable to expect the proposed units to meet all Lifetime Homes criteria. However, as summarised in Appendix C of the accompanying Design and Access Statement the criteria has been met, with the exception of some very minor detail. This is considered reasonable in the context of the existing building and nature of the proposal.

(iii) Neighbouring amenity, including sunlight / daylight and privacy;

5.26 The proposals have been designed to ensure that there is no detrimental impact on neighbouring residents.

5.27 The proposed extension is set back, minimising overlooking and ensuring that there is no increased sense of enclosure, especially on Colonnade. Significant planting is also proposed for all around the existing parapet, again preventing overlooking and maintaining privacy.

5.28 A Daylight / Sunlight report accompanies the planning application. This technical document has assessed the potential impact of the proposals on daylight / sunlight for the following properties:

- 11 – 17 Chandler House;
- 3 – 5 Colonnade Mews;
- 13 – 15 Grenville Street; and
- 12 Grenville Street.

5.29 The report concludes that the proposed scheme maintains existing parapet lines and sets back the extended elements, thereby preserving the sunlight / daylight amenity to neighbouring properties and complying with both BRE guidelines and relevant planning policy.

5.30 A Construction Management Plan also accompanies the application, detailing the measures which will be taken to manage and minimise construction impacts.

5.31 Given all of the above, it is considered that the proposed rooftop extension adheres to the relevant planning policy in respect of design and amenity (CS Policies CS14, DP Policies DP5, DP6, DP24, DP26 and CPG1).

(iv) The impact on heritage assets, specifically the Bloomsbury Conservation Area, nearby listed buildings and the designated view

- 5.32 The application site sits within the Bloomsbury Conservation Area and, although Downing Court is noted as a positive contributor, it is not listed. There are, however, several listed buildings within the property's vicinity including The Brunswick Centre (Grade II), No.s 11 – 24 and 27 Bernard Street (Grade II) and No.s 75 – 82 Guildford Street (Grade II).
- 5.33 As mentioned above, the proposals have been carefully designed so that they are subservient and do not dominate the skyline. While the palate of materials is contemporary, they will relate well to the existing building and the surrounding context in tone and texture.
- 5.34 The accompanying Heritage Report by KM Heritage concludes that the proposed extension would be “*a high quality addition to a good building in the Bloomsbury Conservation Area that is respectful of both Downing Court and the character and appearance of the surrounding area*”. The report further adds that, in terms of the wider conservation area, Downing Court is read in what is essentially a twentieth century townscape where post-war development now dominates the building's context to the north and east. It continues, highlighting that height and larger scale in this location is not exceptional and, indeed, already rises to 7 storeys within Coram's Fields / Brunswick Centre Sub-area 12.
- 5.35 In short, the property sits on the corner of Brunswick Square and the proposals fit within the prevailing pattern of buildings and spaces without detracting from the designated panorama.
- 5.36 Due regard has therefore been had to the significance of nearby heritage assets, as well as to designated view, London Panorama: Greenwich Park Wolfe statue to Tower Bridge. The proposal has been designed accordingly, with technical input, so as to preserve and enhance their respective settings and to ensure that the increased height does not harm the composition of the view as a whole.
- 5.37 Given all of the above, we consider that the proposal adheres to relevant planning policies (FALP Policies 7.2, 7.8 and 7.12, CS Policies CS5, CS14, DP Policies DP22, DP24, DP25, DP26 and CPG's 1 and 6).

(v) Parking

- 5.38 This is a well located site, with excellent public transport accessibility (PTAL 6a).
- 5.39 The proposals are therefore car free, as encouraged by Officers during pre-application discussions and in accordance with relevant planning policy (CS Policies CS11, DP Policies DP17).
- 5.40 Secure parking for 14 bicycles will be provided in the rear courtyard; this is sufficient to accommodate the recently adopted London Mayoral standards of 2 spaces per unit, as well as include some provision for existing residents (FALP Policy 6.13).
- 5.41 Given the above, the proposals accord with relevant planning policy.

(vi) Sustainability

- 5.42 Most planning policies relating to sustainability are for large scale development and therefore not applicable in this instance.
- 5.43 However the proposals seek to incorporate sustainable design measures wherever possible, in line with the general policy aspiration to promote the efficient use of land and buildings and be environmentally sustainable.
- 5.44 This includes provision of a green roof, high standards of thermal insulation and fabric energy efficiency, sourcing materials from certified sustainable sources, low energy lighting, water-efficient fittings, terrace planting, rainwater collection, good daylighting and natural ventilation through openable windows.
- 5.45 Each flat also incorporates space for waste / recycling storage and new communal bins are proposed for the rear courtyard to serve both the existing and proposed residential units in the buildings. The resident building manager will continue to manage the bins.

(vii) Acoustics

- 5.46 An Acoustic Report accompanies the planning application. This specifies an appropriate acoustic enclosure to ameliorate the noise impact of the replacement plant, which will be incorporated into the design. The proposals therefore accord with relevant planning policy (DP Policy DP28).


(viii) Planning obligations

- 5.47 The proposal is subject to both the London Mayoral Community Infrastructure Levy (CIL) and LBC's own CIL. A completed form accompanies the planning application.

6 Conclusions

- 6.1 This report has been prepared by JLL Planning on behalf of Philcol Properties Ltd.
- 6.2 It sets out the planning context and justification for a single storey rooftop extension to provide two new residential units are Downing Court, an existing residential property.
- 6.3 The site is centrally located in an area to which policy directs development growth.
- 6.4 The proposal has been carefully designed in consultation with Officers at LBC; it is subservient to the existing building and overall skyline, and incorporates sustainable measures to deliver a high quality scheme.
- 6.5 The accompanying sunlight / daylight report indicates there is no adverse impact on sunlight amenity for neighbouring properties. Other design measures have been introduced to protect neighbouring resident amenity.
- 6.6 The proposed housing mix provides two 2 bed units, which LBC's planning documents highlight as being in 'very high' demand in the market sector. Each unit exceeds minimum space standards and includes private amenity space.
- 6.7 It is our view that the application accords with relevant national, regional and local planning policies and we consider it appropriate to grant planning permission.

Appendix 1 – Copy of LBC’s pre-application response (8 May 2012)

Pre-application meeting letter	Meeting Date: 08/05/2012 
Lead officer for Camden: Design officer for Camden:	Ays egul Olcar-Chamberlin Planner (West Area) Antonia Powell Senior Planner (Conservation) (West Area)
Consultant name:	Site address:
Ms Pippa Haworth	Downing Court Grenville Street London WC1N 1LX
Proposal	
Part one, part two storey roof addition to provide 3 x 2-bed self-contained units. Two of the proposed units would be duplexes. The proposal would increase the overall floor area by 255 m ² . The floor areas of the each new flats ranges from 75 to 85 m ² .	
The proposed roof extension would be set back on all sides from the parapet walls except at the rear. The top floor element would be set back further.	

Site and surroundings:

The application site is a 6 storey plus basement 'L' shaped block of 25 self-contained flats on the corner of Grenville Street and Bernard Street in the Bloomsbury Conservation Area in the central London area. A parade of houses adjoining the site along Bernard Street (Nos. 11 – 27) is Grade II listed. The Grade II listed Brunswick Centre is also opposite the site.

The entrance into the building is from Grenville Street. The basement area underneath the flats is used for storage, plant rooms and car parking. Vehicles access the basement parking area via a ramp off the Colonnade that runs between Grenville Street and Herbrand Street immediately to the south of the site.

Planning History Records:

2008/4096/P – Planning permission was granted on 20/07/2009 for the conversion of basement storage areas to a 2-bedroom self-contained flat and installation of windows at basement level to Bernard Street and Grenville Street. A S106 agreement was to secure the proposed residential unit as car free.

2012/2291/P – Planning permission agreed to be granted by the members subject to signing a deed of variation to S106 legal agreement on 18/06/2012.

Relevant Policies:

National Planning Policy Framework March 2012 (NPPF):

“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or

better reveal the significance of the asset should be treated favourably.”(pg 32 NPPF).

LDF Core Strategy and Development Policies

Core Strategy:

- CS1 – Distribution of growth
- CS5 - Managing the impact of growth and development
- CS6 – Providing quality homes
- CS9 – Achieving a successful Central London
- CS11 – Supporting sustainable and efficient travel
- CS14 – Promoting high quality places and conserving our heritage
- CS13 – Tackling climate change through promoting higher environmental standards.
- CS18 – Dealing with our waste and encouraging recycling
- CS19 – Delivering and monitoring the Core Strategy

Development Policies:

- DP2 – Making full use of Camden's capacity for housing
- DP5 – Homes of different sizes
- DP6 – Lifetime homes and wheelchair homes
- DP16 – The transport implications of development
- DP17 – Walking, cycling and public transport
- DP18 – Parking standards and limiting the availability of parking
- DP22 – Promoting sustainable design and construction
- DP24 - Securing high quality design
- DP25 – Conserving Camden's heritage
- DP26 – Managing the impact of development on occupiers and neighbours
- DP29 – Improving access

Camden Planning Guidance 2011

- CPG1 (Design)
- CPG2 (Housing)
- CPG3 (Sustainability)
- CPG6 (Amenity)
- CPG7 (Transport)

Bloomsbury Conservation Area Appraisal and Management Strategy

Land use: The creation of new flats in principle complies with policies CS1, CS6 and DP2. However more detailed consideration needs to be given to the mix of the proposed flats, the living standards and accessibility of the proposed flats, impact of the proposed roof addition on the appearance and character of the existing building and the conservation area and the impact on the amenities of the neighbouring properties.

Standard of accommodation: The minimum unit size for up to four person occupancy as set out on page 54 of CPG2 is 75sqm. It appears from the proposed layouts each of the new units would be spacious and receive adequate daylight. The proposed development would be in accordance with the Council's residential development standards.

Access and Lifetime homes: Given the site constrains it would be unreasonable to expect the proposed units to meet all Lifetime Homes criteria. The proposed units would be accessed from the communal staircases and the existing internal lift would be extended to one floor level up to provide access to the front doors of the units. Any future application should be accompanied with a Lifetime Homes Statement.

Mix of units: No information has been provided in relation to the mix of existing units with this pre-application. Policy DP5 sets the Council's priorities for homes of different sizes and resists development proposals that contain only one-bedroom and studio flats. According to "Dwelling Size Priorities" Table of policy DP5 there is a high need for supplying three and two bedroom flats in private developments (page 38 of LDF Development Policies). The table gives the lowest priority to one bedroom or studio flats. In order to secure a range of self-contained homes of different sizes you are advised to take into consideration the prioritised types of housing. That should be included as part of any future revisions.

Design and Appearance: The aims of the new LDF policies concerning design and conservation areas do not contradict the National Planning Policy Framework (NPPF).

Following the pre-application meeting a new set of drawings illustrating the different design options were submitted. The below comments are based on the later drawings and originally submitted floor plans.

Downing Court is on a corner site and part of a block which includes terraces of Georgian town houses some of which are statutorily listed. Downing Court is already notably higher than the adjacent historic buildings and therefore it is considered that a single extra storey would be the maximum additional massing and height that could be introduced on this site in order to prevent any detrimental impact on the character or appearance of this part of the Conservation Area and the setting of the nearby Listed Buildings.

The proposed additional two storeys would be over dominant in terms of the proportions to the host building and the neighbouring listed buildings and you are advised to consider a single storey extension with greater set back from the building edges. It is clear that the proposal presented would be contrary to design policies CS14, DP24 and DP25.

Among the different options in terms of the detailed design the articulated design approach (option B1) which reflects the expressed bays and brickwork of the existing building would be the most positive approach. The generous set back also helps by off setting the impact of the additional floor. The similar brown brickwork to the host building is likely to give the most homogeneous appearance to the overall scheme.

Impact on Amenity: It is unlikely that the proposed scheme would raise amenity issues in terms of unacceptable overlooking and loss of daylight to the neighbouring properties. However there could be overlooking issues from the proposed roof terraces. That would need to be addressed as part of any future planning application.

Your attention is drawn to the fact that adequate provision should be made for refuse and recycle storage for the proposed units. The storage space at the basement level would be reduced when the approved scheme for the conversion of the basement level is implemented.

Transport: The new residential units would be required to be car free as the site is highly accessible by public transport. A S106 Legal Agreement for the new residential units to be 'car free' would be sought.

No details of cycle parking and storage have been submitted. In accordance with the Council's standards one cycle parking space per unit is required. The cycle parking facilities would need to be designed in accordance with guidance in CPG7.

In addition to this the proposed construction works would be likely to require scaffolding on the footway. Because of that there could be damage to the adjacent footway during the

construction works. A financial contribution towards the cost of repaving the footway secured by S106 agreement would be sought.

A Construction Management plan in accordance with guidance in CPG6 needs to be submitted and secured by S106 agreement to mitigate the disturbance to the transport conditions in the area and amenities of the neighbours.

CIL: This proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) as there would be additional residential floorspace and units. Based on the Mayor's CIL charging schedule and the information given on the plans, the charge for this scheme is likely to be £12,750. This will be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index.

Sustainability

The submitted "Pre-planning Application Consultation" statement refers to sustainability policies. However there is no indication of any sustainability measures forming part of the design in accordance with policies CS13 and DP22. Although the scheme falls below the threshold to require an Eco-homes Assessment some elements of sustainability measures could be incorporated into the design (such as use of solar panels, green roofs, use of energy efficient heating, cooling and lighting systems), high level of insulation, efficient water use etc.) Please see CPG3 for further information.

Conclusion: The proposed roof addition by reason of its proximity to the listed buildings, prominent position, height, height, bulk and lack of set back from the existing building edges would be unacceptable in design terms. You are advised to revise the scheme in accordance with the recommendations made in "design and appearance" section. In addition to that you are advised to take into consideration incorporation of sustainability measures, refuse and recycle storage and cycle parking provision for any future revisions.

Likely s106 terms:

- Car free development
- Financial contribution towards the cost of repaving the adjacent footway
- Construction Management Plan

Please refer to the website below for guidance on submitting an application:

<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application/supporting-documentation--requirements/>

This response represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your emerging proposals will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

If you have any queries in relation to the above matters do not hesitate to contact me.

Yours sincerely

Aysegul Olcar-Chamberlin
Planning Officer – West Area Team
Development Control

Tel: 020 7974 6374

Appendix 2: Public consultation leaflet



JLL London

Caroline Harper

Associate Director
Planning and Development
London
+44(0)20 7852 4138
Caroline.Harper@eu.jll.com

JLL London

Emma Thorpe

Graduate Planning Consultant
Planning and Development
London
+44(0)20 7399 5020
Emma.Thorpe@eu.jll.com

www.jll.com

Jones Lang LaSalle

© 2014 Jones Lang LaSalle IP, Inc. All rights reserved. The information contained in this document is proprietary to Jones Lang LaSalle and shall be used solely for the purposes of evaluating this proposal. All such documentation and information remains the property of Jones Lang LaSalle and shall be kept confidential. Reproduction of any part of this document is authorized only to the extent necessary for its evaluation. It is not to be shown to any third party without the prior written authorization of Jones Lang LaSalle. All information contained herein is from sources deemed reliable; however, no representation or warranty is made as to the accuracy thereof.