

Planning Statement

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TEMPLE

LEADERS IN ENVIRONMENT,
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Report for – University College London Hospitals Charity (UCLHC) T3020 Arthur Stanley House

Planning Statement for the refurbishment and extension of Arthur Stanley House

Final



Document Version Control

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1.0 Introduction

This Planning Statement has been prepared by Temple Group Limited (Temple) on behalf of University College London Hospitals Charity (UCLHC - the applicant), for the site known as Arthur Stanley House, 40-50 Tottenham Street, W1T 4RN. The scheme comprises the refurbishment of the existing building and its extension to create a mixed use commercial and residential scheme, including a new build (annex) on the northern part of the site that faces Tottenham Mews.

This statement accompanies a full planning application for:

“Refurbishment and extension to enable a change of use from health care (Class D1) to a mixed use development comprising 1,976.48 sq.m. residential (Class C3) and 5,487.04 sq.m. office floorspace (Class B1) including new build to the rear.”

This Planning Statement is one of a number of assessments submitted with the application and should be read in conjunction with those. Where relevant, the assessments are dealt with within this statement. The application comprises the following documents:

- Completed application form, ownership certificate and CIL additional information form;
- Affordable Housing Statement (*within this document*);
- Design and Access Statement;
- Heritage Statement;
- London View Management Framework Assessment (*within the Design and Access Statement*);
- Air Quality Assessment;
- Contaminated Land Assessment;
- Preliminary Ecology Appraisal;
- Noise Assessment;
- Sustainability Statement (including Energy and Construction);
- Waste Strategy (*within the Design and Access Statement*);
- Code of Construction Practice;
- Transport Assessment;
- Travel Plan;
- Daylight and Sunlight Assessment;
- Floorspace schedule;
- Associated drawings; and
- Statement of Community Involvement.

1.1 Report Structure

This Planning Statement comprises the following sections:

- Site and surrounding area;
- The proposed development;
- Policy context;
- Policy analysis and development appraisal;
- Community Infrastructure Levy (CIL) and planning obligations; and
- Conclusion.

2.0 Site and Surrounding Area

2.1 Site

The site is located in Bloomsbury ward, London Borough of Camden. Situated on Tottenham Street, it lies east of Cleveland Street and west of Charlotte Street and its eastern elevation is to Tottenham Mews. It is located near the Camden-Westminster boundary and lies within the Charlotte Street Conservation Area.

Arthur Stanley House is an eight storey brick-faced 1960s block of little architectural merit, which envelops the majority of the site area. The building comprises eight regular floor plates, two basement levels and a large chimney of about 10-storeys, which is located above the disused boiler house. Temporary buildings are situated on the northern part of the site along with a 2m high brick wall fronting Tottenham Mews. The site was last in use in 2005/6 by University College London Hospital Trust, though that use (Class D1) has since been relocated (see 5.3 for detail). Initial strip-out works have since been carried out in Arthur Stanley House, as well as required enabling works.

The boundary of the development site and its location is shown in Figure 1 and on the site location plan, which accompanies this application. The total site area is 0.1 hectares.



Figure 1: Site location plan

2.2 Surrounding area

The surrounding area contains a range of built forms and scales with traditional four storey terraced buildings to the south and more modern, institutional blocks of a similar scale to Arthur Stanley House directly to the north. The area is vibrant, being close to Tottenham Court Road and comprised of a mix of uses typical of this sort of location, significant number of commercial uses. The heritage assets in the vicinity of Arthur Stanley House are the Charlotte Street and Charlotte Street West Conservation Areas (the latter being in the City of Westminster).

In the immediate vicinity of Arthur Stanley House, the original character of the area is illustrated by the terrace of houses opposite (although most of these have later facades and roof extensions, and have been converted to business uses on the ground floor).

Tottenham Mews, immediately east of Arthur Stanley House has been in industrial use at least since the Nineteenth Century and the workshop and warehouse buildings which predominate on the east side are associated with and illustrative of such uses from that time onwards.

There are a few parks and open green spaces located within walking distance (5-10 minutes) of the site; these include Whitfield Gardens (320m), Fitzroy Square Garden (480m); Bedford Square Gardens (480m). These total approximately 12,722 sq m.

There are two adjacent schemes that have recently been granted planning permission; consequently these have been taken into account in the design of the scheme. These are:

1. MHRC building (2012/4786/P) – adjacent to the north of the site at 14-19 Tottenham Mews London W1T 4AA. The planning permission was for the erection of a 5 storey building, including basement level and roof level plant enclosure, to provide a Mental Health Resource Centre (MHRC) including recovery centre, consultation and activity rooms (Class D1) and 6 x 1 bed short-stay bedrooms (Class C2) (following demolition of existing two storey MHRC building (Class D1)). The scheme was granted planning permission (and is subject to S106 legal agreement) on 13th December 2014 and is therefore extant;
2. 73 - 75 Charlotte Street, 34-38 Tottenham Street and 4 Tottenham Mews (2012/2052/C). The Council refers to this as the 'Derwent scheme'. It is directly east of the site on the eastern side of the Mews. The permission granted on 13th December 2012 was for the demolition of existing buildings in association with a new mixed use development and the scheme is underway.

2.3 Access

The site has the highest level of accessibility, with a PTAL level of 6b. It is currently very well connected to public transport services within a 10min walk, with Goodge Street station (160m) to the east, Great Portland Street station (800m) to the north and Tottenham Court Road (645m) station to the south. These offer services on the Northern, Central, Circle, Hammersmith and City and Metropolitan London underground lines. Bus services are available from Tottenham Court Road, Euston Road and Oxford Street, and a number of Barclay cycle hire points are located within close proximity of the site.

2.4 Facilities, services and other amenities

Research on the availability of facilities and services within 10 minutes' walking distance (800m) reveals that the site lays amongst an abundance of amenities that would be available to future residents and occupants of the site. Prominent streets close to the site offering a range of amenities include Cleveland Street; Goodge Street; Charlotte Street and Tottenham Court Road. The following facilities, services and other amenities are located close by:

- Shops: restaurants, newsagent, pharmacy, retail;
- Services: library, Barclay bike cycle hire, bank, post office, laundrette, hospital, hotels/hostel, community centre, cash machine;
- Leisure: public houses, bars; sports centres; and
- Education: universities; colleges; primary school; preparatory school.

Further information in regard to site history and site analysis is dealt with in the Design and Access Statement, which forms part of this application.

2.5 Planning history

The site has been subject to two relevant planning permissions¹. These were for the following:

- TP8221/C - The erection of an eight-storey building, plus basement, on the site of Nos. 40-50 Tottenham Street and 20-22 Tottenham Mews, St. Pancras, for use by the Department of Physical Medicine and the School of Physiotherapy of the Middlesex Hospital (Granted 1962); and
- 2011/0939/P - External additions and alterations to include the installation of 4 exhaust flues, external chiller enclosure and acoustic louvres at roof level, along with alterations to the ground floor entrance canopy, in association with the building being used as pathology labs (Class D1) (granted on 26.04.2011 but not implemented).

A S106 legal agreement between Camden and UCLH in 2004 exempted Arthur Stanley House from the provision of affordable housing, providing a number of affordable housing units were delivered on the Middlesex Annex site. However, this application is not reliant on that Agreement and does include affordable housing in line with the Council's affordable housing policies.

Three pre-application meetings were held with the Council in relation to this scheme, on 13th May 2014, 2nd September 2014 and 8th October 2014. The proposal has been designed to meet policy and local guidance and an additional design iteration meeting has been held (10th December) with the Council, to discuss the elevation approach to the buildings. Previous iterations of the design can be seen in the Design and Access Statement, submitted with this application.

Consideration of scheme at those meetings focussed principally on the following:

- Land use (loss of healthcare facility; creation of residential units; contributions towards affordable housing; and creation of commercial floorspace);
- Design; and

¹ Details sourced from Camden's online planning application search

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- Transport and Highways impacts.

A Planning Performance Agreement (PAA) has been agreed between the applicant and the London Borough of Camden.

2.6 Consultation

Consultation has been carried out with Camden's planning, housing and design officers (including secured by design) and representatives from local conservation and heritage groups throughout the design process.

Public consultation events were held to encourage local community and stakeholder engagement in regard to the scheme. They were held on Wednesday 19th November and Saturday 22nd November 2014, at Fitzrovia Community Centre. Both the Charlotte Street Association and Fitzrovia Neighbourhood Centre were informed, with publication of the proposed events issued in Fitzrovia News.

The outcome of the public consultation events was generally positive, with support for the refurbishment of Arthur Stanley House that has been vacant for some years. However, generally, there were concerns raised in regard to the social housing provision and a general lack of connection with Bedford Passage.

Further information regarding the public consultation events, including the Consultation Strategy, views of the scheme and number of attendees is detailed in the Statement of Community Involvement, which accompanies this application.

3.0 The proposed development

The proposed development comprises two main elements, these are:

- Refurbishment and redevelopment of the existing eight storey Arthur Stanley House, which will comprise of commercial (5,487.04 sq.m.) and private residential (1,976.48 sq.m.) uses including;
- New build (1,299.37 sq.m.) to the rear facing Tottenham Mews that will comprise affordable housing and market residential.

3.1 Development design

The scheme has been designed to reflect site ownership, which is currently split between the applicant and an additional freeholder. The applicant holds the freehold of the eastern part of the existing building and site, with leasehold on the remainder. The proposed design allows the applicant to use its freehold as residential and commercial with the remainder on which it holds a lease as commercial office.

Table 1: Schedule of areas

Use	Proposed Area (sq m)
Commercial	5,487.04 sq m (GEA)
Private residential	1,588.82 sq m (GEA)
Affordable residential	387.66 sq m (GEA)
Residential amenity space (balconies/terraces)	218.67 sq m (GEA)
Plant space (total)	675.43 sq m (GEA)

Consideration of the adjacent developments, both existing and approved, has been incorporated into the design process. The existing Arthur Stanley House facade will be enhanced and natural visual surveillance improved. A new 3 - 5 storey residential building is proposed on the northern part of the site, which will front Tottenham Mews. The massing of the scheme, particularly the new building, has been informed by a right to light study given the proximity of adjacent properties, as well as a sunlight and daylight assessment. The proposed development will be set back to facilitate the proposed Bedford Passage connection, whilst the existing site boundary wall will be removed to improve the Tottenham Mews entrance. Additionally, new active frontages have been designed to enhance the existing character of Tottenham Mews and Tottenham Street and a wider pavement and space adjacent to the mews has been which eliminates the narrow section of the street near the Derwent scheme (DP29).

Space at the rear of the building has been defined, with the Middlesex House gable wall providing the opportunity to create a new courtyard garden and roof gardens, consequently preserving and enhancing views and natural daylight. Key views have been assessed to address ways to enhance the corner of Tottenham Street and Tottenham Mews, and how to remove the existing high-level beam. The proposed residential new build to the north east of the site shows the massing stepping back from the street line to allow natural daylight into the street. Arthur Stanley House at high level incorporates reduced massing to improve street level views from Tottenham Street. Ultimately, the

proposed development will reduce massing and create a stepped approach to reduce bulk and scale overall.

Further detail regarding how the scheme meets housing standards and Lifetime Homes criterion is provided in the Design and Access Statement, which accompanies this application.

4.0 Policy context

The following section provides a review of the relevant development plan and emerging policies against which this proposal should be considered.

4.1 National Planning Policy Framework (2012)

The National Planning Policy Framework (NPPF) was published in March 2012. Its introduction is part of the Government's reform to make the planning system more concise, through simplifying policy pages. It supersedes a number of former Planning Policy Statement (PPS) documents.

It indicates that proposed development that accords with an up-to-date Local Plan should be approved (Para. 12) and that local authorities should approve development proposals that accord with the development plan without delay (Para. 14).

The 'golden thread' of the planning system, as articulated in the NPPF, is the presumption in favour of sustainable development. Key policies in delivering sustainable development, relevant to the proposal include:

- 4. Promoting sustainable transport;
- 6. Delivering a wide choice of high quality homes;
- 7. Requiring good design;
- 8. Promoting healthy communities;
- 10. Meeting the challenge of climate change, flooding and coastal change; and
- 12. Conserving and enhancing the historic environment.

4.2 The London Plan (2011)

The London Plan is the strategic plan for London, published by the Mayor in July 2011. It sets out a framework that integrates economic, environmental, transport and social aspects for development for the period to 2031. It provides the framework for local policies and planning application decision making at the local level, where local policies of every London borough should be in general conformity with the plan. Revised Early Minor Alterations (REMA) was published in October 2013 to ensure consistency with the NPPF. Further Alterations to the London Plan (FALP) were published on 15 January 2014 and following the Inspectors Report published in December 2014, the plan is anticipated to be adopted in March 2015.

Relevant spatial policies and strategic objectives to this application are:

- Policy 3.3 Increasing housing supply;
- Policy 3.4 Optimising housing potential;
- Policy 3.5 Quality and design of housing developments;
- Policy 3.8 Housing choice;
- Policy 3.9 M3.11ixed and balanced communities;

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- Policy 4.3 Mixed use development and offices;
 - Policy 5.1 Climate change mitigation;
 - Policy 5.2 Minimising carbon dioxide emissions;
 - Policy 5.3 Sustainable Design and Construction;
 - Policy 5.6 Decentralised Energy in Development Proposals;
 - Policy 5.9 Overheating and Cooling;
 - Policy 5.11 Green roofs and development site environs;
 - Policy 5.13 Sustainable Drainage;
 - Policy 6.3 Assessing effects of development on transport capacity;
 - Policy 7.1 Building London's neighbourhoods and communities;
 - Policy 7.3 Designing out crime;
 - Policy 7.4 Local character;
 - Policy 7.5 Public realm; and
 - Policy 7.6 Architecture.

4.2.1 Supplementary Planning Guidance (SPG)

Supplementary Planning Guidance (SPG) documents were produced by the Mayor to further support statutory development plans and provide further detail to policies listed within the London Plan. Those of relevance to the scheme are:

- Sustainable Design and Construction (2014);
- The control of dust and emissions during construction and demolition (2014);
- Housing (2012); and
- Shaping Neighbourhoods: Character and Context (2014).

4.3 Camden Local Development Framework (LDF)

Camden's relevant Local Development Framework (LDF) policies are outlined below.

4.3.1 Core Strategy (2010-2025)

The London Borough of Camden's Core Strategy was adopted on 08 November 2010. It is a 15 year plan that forms part of the LDF, along with Development Policies (2010) and Camden Planning Guidance. Key Core Strategy policies of relevance to this application are:

- CS1: Distribution of growth;
- CS3: Other highly accessible areas;
- CS5: Managing the impact of growth and development;

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- CS6: Providing quality homes;
 - CS8: Promoting a successful and inclusive Camden economy;
 - CS9: Achieving a successful Central London;
 - CS11: Promoting sustainable and efficient travel;
 - CS13: Tackling climate change through promoting higher environmental standards;
 - CS14: Promoting high quality places and conserving our heritage;
 - CS16: Improving Camden's health and well-being;
 - CS17: Making Camden a safer place; and
 - CS18: Dealing with waste and encouraging recycling.

4.3.2 Development Policies (2010-2025)

Camden Development Policies were adopted on 8th November 2010. It sets out detailed planning criteria that are used to determine applications for planning permission in the borough over the next 15 years. Policies of relevance to this application are:

- DP1 Mixed use development;
- DP2 Making full use for Camden's capacity for housing;
- DP3 Contributions to the supply of affordable housing;
- DP5 Homes of different sizes;
- DP6 Lifetime homes and wheelchair housing;
- DP15 Community and leisure uses;
- DP16 The transport implications of development;
- DP17 Walking, cycling and public transport;
- DP18 Parking standards and limiting the availability of car parking;
- DP22 Promoting Sustainable Design and Construction;
- DP23 Water;
- DP24 Securing high quality design;
- DP25 Conserving Camden's heritage;
- DP26 Managing the impact of development on occupiers and neighbours;
- DP27 Basements and lightwells;
- DP28 Noise and vibration;
- DP29 Improving access; and
- DP32 Air quality and Camden's Clear Zone.

4.4 Fitzrovia Area Action Plan (2014)

The Fitzrovia Area Action Plan was adopted in March 2014. It sets out a coordinated vision for the area, linking with development policies and seeks to ensure that proposed development will maximise local benefits.

Arthur Stanley House is identified within the plan as an opportunity site among the 'Bedford Passage' sites and is identified as being suitable for housing. It also falls within the Charlotte Street Conservation Area and Howland Street Character Area (within the Fitzrovia Area Action Plan). The plan suggests the key development principles for the site, those of which the scheme supports are:

- Improved frontage to Tottenham Mews;
- Positively contribute to the streetscape and the local environment;
- Provision of permanent self-contained homes including an appropriate contribution to affordable housing;
- Preserve and enhance the Charlotte Street Conservation Area and should contribute significantly more to the character of the area than the existing structure;
- Upper floors should be set-back to protect the character of Tottenham Street and the mews;
- Development should be of a height which does not harm the strategic viewing corridor from Parliament Hill to the Palace of Westminster;
- Connect to a local energy network, and should provide for a connection wherever feasible and viable, potentially cross borough; and
- Demonstrate that there is adequate waste-water capacity both on and off the site.

4.4.1 Charlotte Street conservation area appraisal and management plan (2008)

The Charlotte Street conservation area appraisal and management strategy was adopted on 24 July 2008. It sets out what makes the conservation area 'special' whilst provides important information to a range of stakeholders in regard to the types of alterations and development that are likely to be acceptable within the area.

Arthur Stanley House is highlighted as an opportunity site and is identified as a '**detractor in the conservation area as a result of its scale and bulk**'. The appraisal is dealt with in further detail within the accompanying Heritage Statement.

4.4.2 Camden Planning Guidance

Camden has a number of supplementary planning guidance documents that support the LDF policies. Those of relevance are:

- CPG1: Design
- CPG2: Housing;

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- CPG3: Sustainability;
 - CPG4: Basements and lightwells;
 - CPG6: Amenity; and
 - CPG7: Transport.

4.5 Community Infrastructure Levy (CIL)

The scheme is required to pay the Mayoral CIL at a rate of £50 per sq m for commercial and residential use. A completed *additional information form* is included among the application documents, as required.

The London Borough of Camden's Community Infrastructure Levy (CIL) was subject to a public hearing in November 2014. The Council anticipates commencing CIL charging toward the end of March 2015.

4.6 Key policy considerations

A thorough review of the national, regional and local planning policies has revealed that the following themes are relevant in determining this planning application:

- Principle of development;
- Mixed Use;
- Loss of existing use;
- Housing;
- Design;
- Sense of place and local identity;
- Place making and permeability;
- Amenity;
- Sustainable environment; and
- Transport and accessibility.

Though this planning statement deals concisely with these themes, however, technical details regarding design, built heritage, landscaping, ecology, energy efficiency, transport, noise, air quality, ground conditions and transport are dealt with further in the accompanying assessments.

5.0 Development appraisal and policy analysis

5.1 Principle of Development

The NPPF identifies within the 12 core planning principles for achieving sustainable development that every effort should be made to objectively identify and then meet the housing, business and other development needs of an area, and development should respond positively to wider opportunities for growth. Fundamentally, there is a need to significantly boost housing, focusing on the provision of a wide choice of high quality homes to meet the needs of different community groups (Policy 6) and encouraging mixed use developments². It also highlights that London desperately needs more homes in order to promote opportunity and real choice for all, with a range of tenures that meets their diverse and changing needs and at prices they can afford.

The current London Strategic Housing Land Availability Assessment 2013 (SHLAA) highlights the need for 48,841 additional new homes to accommodate an estimated population of 10.1 million by 2036. The minimum ten year target (2011-2021) for Camden is quoted as 6,650 homes, with an annual average housing provision monitoring target of 665 homes (London Plan Policy 3.3). To achieve suggested targets, policy encourages the optimisation of housing potential through good design principles in regard to density (Policy 3.4).

Supporting this, regional and local policy encourages mixed use development and redevelopment in supporting quality enhancement of office stock (London Plan Policy 4.3 and CS8). Reflecting the NPPF and London Plan, delivering growth and development to accommodate a growing and changing population is a priority for the borough, as stated in the Core Strategy (CS1 and CS6). In the Central London area of Camden, the priority land use is housing, though employment uses are sought as mixed use development. In order to adapt to a growing population in the borough Camden seeks to efficiently use the borough's limited land through providing an appropriate mix of uses, which ultimately will reduce congestion by lower commuting, increase the supply of housing where possible, and increasing safety and security as use of space is more varied throughout the day (Policy CS1 and DP1).

The Fitzrovia Area Action Plan confirms that the site is appropriate for housing and it is also identified as a deliverable site within the Camden Annual Monitoring Report (2011/12), indicating that the site has the potential to deliver homes by 2016/17. Although the site has been identified in Fitzrovia Area Action Plan as an opportunity site for housing, it does *not* require a specific level of housing and does *not* preclude a mix of uses or exclude provision of other uses in demand.

In light of the above, the principle of the development fully accords with the development plan.

5.1.1 Mixed Use

Policy D1 of the Council's development policies confirms that the Council will require a mix of uses in the borough including a contribution towards the supply of housing. The policy specifically requires 50% of all *additional* floorspace to be provided as housing, where more than 200 sq.m. of additional floorspace is proposed within a development. The policy acknowledges that developing a mix of uses on individual sites and across an area can be beneficial in a number of ways, and

² NPPF (2012) Core Planning Principles – pp. 5

therefore seeks to extend the parts of the borough that have a well-established mixed-use character (such as Fitzrovia).

The policy requirement for percentage of housing within the application applies to the new build element of the scheme as additional floorspace, not the existing building. As such, of the 1,300sq.m (rounded up) additional floorspace proposed, 650 sq.m would need to be provided as housing. The scheme includes almost 2,000sq.m of housing. In applying this policy, the Council has confirmed that the mix of development proposed in this application is acceptable in this location, having regard to the criteria *a-i* of the policy.

5.1.2 Previous use

Policy DP15 (c) is relevant to the lawful use of the site which was in Class D1 use. The policy states that the Council will protect existing community facilities (which include healthcare facilities) by resisting their loss *unless* a replacement facility that meets the needs of the local population is provided. In this case, the Council agrees that **criteria c** of the policy applies.

The healthcare services once provided, which included: orthopaedics; rheumatology; a hydrotherapy pool; and surgical administration services, were relocated in their entirety to the new University College Hospital (UCH), Euston Road, in 2005/06. Details are shown in Table 2, below.

Therefore, it is clear that a replacement facility for the community use has been provided and as such, the proposal complies with policy DP15 of the development plan.

Table 2: Relocation of facilities from Arthur Stanley House to UCH

Service/facility	Relocation
Orthopaedic service including Outpatients (2 floors)	UCH Middlesex Tower and UCH Podium Level 1
Rheumatology Outpatients (2 floors)	UCH Podium Level 1
Occupational Therapy (1 floor)	UCH Basement
Physiotherapy Gym (Basement)	UCH Basement
Hydrotherapy Pool (Basement)	UCH Podium Basement
Immunology including Animal house (2 floors at the top of the building)	Rayne Institute
Clinical Administration Services	Maple House, 149 Tottenham Court Road and 250 Euston Road

5.2 Housing

Policy DP2 of the Council's Development Policies seeks to maximise the supply of housing, particularly as a contribution on sites that are underused or vacant accounting for other uses needed on site and as previously stated the Council has agreed that the mix of uses is acceptable. The scheme will provide a mix of housing tenures, which will foster social diversity (London Plan Policy 3.9) and offer a choice of housing sizes in line with policy guidance (London Plan Policy 3.8).

5.2.1 Affordable housing provision

In so far as Policy DP3 (contributions to the supply of affordable housing) is relevant, the scheme provides a policy compliant level of affordable housing, meeting the expectation for affordable housing with the right levels provided. In this instance, the 'sliding scale' applies under DP3, as agreed with the council.

The sliding scale requires 10% affordable housing (gross external area) for every 1,000 sq.m. of additional housing proposed. This scheme proposes 1,976.48 sq.m. (GEA) residential floorspace and therefore 19.76% of that should be affordable housing. The required floorspace equates to 391 sq.m. (GEA), with the scheme proposing just short of this with a floorspace of 388 sq m (GEA). In this regard, the difference in floorspace is not material (equating to 3 sq.m.) and it is considered entirely reasonable that the scheme should be considered as complying with Policy DP3. The floorspace of the units proposed also exceed the relevant London Plan standards, details of which are detailed later in this report. It is also noted that by measurement of the areas as NIA (within the floorspace schedule of the design and access statement), the proposal significantly exceeds the required level of affordable housing.

While the policy is subject to a number of criteria to determine the appropriate level of affordable housing and whether it is provided on site, the level of affordable housing provided and the Council's acceptance of the balance of mix of uses (office and residential) makes it unnecessary to consider these criteria in detail. As such, the application is not accompanied by an affordable housing viability assessment.

5.2.2 Unit size

The development will provide a mix of unit sizes in accordance with policy CS6 and DP5 (a-e), having regard to the level of affordable housing appropriate to this scheme. The supporting text to Policy DP5 (Para. 5.4) confirms that the Council expect most developments to include some homes that have not been given a priority level, and some homes that are identified as medium priority. It also confirms that the Council will seek to focus provision around the very high and high priority sizes by assessing dwelling mixes against the aims in the priorities table. In so far as is relevant to this scheme, the aim is for at least 50% of social rented dwellings to be large homes (with three bedrooms or more), and for at least 40% of market homes to contain two bedrooms.

Having regard to the priorities table under Policy DP5 and table 4 above, the affordable housing proposed exceeds the policy aim (50%) for highly demanded three bed units, with *all* (100%) of the social rented housing provision being three bed duplex. The scheme also exceeds the policy aim (40%) for two bed units, which are a very high priority within the borough, with nine (90%) of the market housing being this unit size.

Table 4: Schedule of unit size – homes of different sizes (DP5)

Unit type	Tenure	Number of proposed units	Policy aim (%)	Achievement in relation to policy (%)	Priority
1 bed	Market	1	n/a	n/a	Lower
2 bed	Market	9	40%	90% - Exceeded	Very High
3 bed duplex	Social rented	2	50%	100% - Exceeded	High
Total		12			

5.3 Design

Housing quality will be delivered to meet the standards set and aims to be of high quality (NPPF 6.47 and 7). London Plan policy indicates that ‘housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment’ (Policy 3.5). Specific requirements and set standards regarding housing are detailed in the Mayor’s Housing SPG (2012).

All of the proposed dwellings meet the minimum size requirements of the SPG and provide suitable private amenity space (London Plan Policy 7.5; 7.17; & 3.6; and DP24). The scheme will also therefore meet standards in Policy CS6 of the Council’s adopted Core Strategy and Policy DP24 of the Development Policies. Design has ensured the proposed scheme is inclusive, meeting the wheelchair accessibility requirements, ensuring that sufficient space and accessibility, both internally and externally (NPPF 6.50; Housing SPG Annex 2; Local Plan CS6 and DP6).

New office accommodation will be well lit and include a proportion of accommodation which would be attractive to small and medium size enterprises (SMEs), in accordance with DP13 and the Fitzrovia Area Action Plan Principle 4.

The accompanying design and access statement (section 5) and drawings set out the above in detail.

The scheme will also reduce the mass of the existing building by its elevational treatment and the set back of the top floor from Tottenham Street. Elevations have been designed in consultation with the Council and taking account of comments made at the public consultation event. The scheme reflects the general arrangement of openings and widow proportions in the area, materials and the architectural approach of the existing mews buildings.

The accompanying heritage statement reiterates that the existing building is a detractor from the heritage asset and given the design approach above and removal of the boiler house and chimney, the scheme will have a beneficial impact, enhancing to a minor extent the heritage values of the heritage assets.

The scheme therefore complies with national (NPPF 7; 12), regional (London Plan Policy 3.5) and local (CS6; DP1; DP2; DP3; DP5 and DP250 policies. Further details demonstrating compliance are contained in the Design and Access Statement.

5.4 Place making and permeability

The NPPF indicates that high quality design of the built environment, including buildings to public realm, is of great importance and is a fundamental element in achieving sustainable development (policy 7). Camden's planning guidance on design (CPG1) states that *design of the built environment affects many things about the way we use spaces and interact with each other, comfort and enjoyment, safety and security and our sense of inclusion.*

Policy indicates that design is important in ensuring new development creates a sense of place and identity with its existing setting, whilst ensuring principles of sustainable development are achieved (London Plan Policy 7.2; CS13; CS14; CS17; and CPG1). Reinforcing the character of the area can be achieved through high quality design, respecting and enhancing local distinctiveness (NPPF 7 and London Plan Policy 7.4). The site is identified as an opportunity site including the Fitzrovia Area Action Plan. The building is described in the Charlotte Street Conservation Area Appraisal and Management Plan (2009) as a 'detractor' in regard to its scale and bulk, subsequently highlighting the opportunity to 'provide a sensitive replacement more consistent with the character of the conservation area'.

The practical implementation of that policy is that Arthur Stanley House and the Tottenham Mews Day Hospital (adjacent the application site) should improve the frontage to Tottenham Mews and that buildings should address the mews and positively contribute to the streetscape and the environment. It also identifies a new link through Bedford Passage that could be delivered as part of Fitzrovia Area Action Plan.

The application proposals are set back from the existing building line on the Mews which together with the committed Day Hospital site planning permission will help deliver that part of the master plan. The scheme will also deliver a strong frontage to the mews addressing the office and residential context in which it lies and increase the public realm and road width at the entrance to the Mews adjacent Tottenham Street.

Furthermore, the scheme will not only refurbish and regenerate a derelict building but will provide a mix of uses: commercial office space; private housing; and affordable housing. Together with the public realm enhancement to Tottenham Street and Tottenham Mews it will therefore deliver the relevant part of the Fitzrovia Area Action Plan.

5.5 Amenity

As stated in Camden's supplementary guidance on amenity, *a key objective of the Camden Core Strategy is to sustainably manage growth so that it avoids harmful effects on the amenity of existing and future occupiers and to nearby properties* (CPG6). Consideration has been given, highlighting methods of protecting the amenity of Camden resident's during construction (CS5 and DP26), as set out below.

The impact of the development on occupiers and neighbours has been taken into account throughout the design stages, taking into account; visual privacy and overlooking; overshadowing; daylight and sunlight levels; and noise and vibration has been managed. Additionally, internal layout standards and providing required facilities for waste, storage, bicycle and outdoor space (wherever practical) have been incorporated (DP26; CS5 and CS14).

5.5.1 Air Quality

Improved air quality is sought by national (NPPF 11), regional (London Plan 7.14), and local (CS16 and DP32) policy. As air quality is poor in Camden the borough has been declared an Air Quality Management Area (AQMA), this has subsequently prompted the production of an Air Quality Action Plan (2013-2015). As a result of the assigned AQMA and to ensure air quality is not further depreciated as a consequence of development, an air quality assessment has been conducted at a level of detail appropriate for major development (NPPF 11; London Plan 7.14; and DP32).

An air quality assessment was conducted to evaluate the suitability of the site for residential use and the likely impacts caused from construction, drawing upon relevant policy guidance. The report conclusions highlight that it is unlikely that the development could not meet air quality objectives, when complete and occupied. The indoor air quality will be of adequate quality, following suitable mitigation measures such as the installation of a ventilation system and air intake vents, in line with BREEAM and British Standard 5415. Due to the small scale and proposed refurbishment, impacts are considered to be less significant. However, due to the close proximity to residential properties, emissions from construction works will need to be mitigated to avoid significant affects. The scheme therefore complies with the relevant policy (NPPF 11; London Plan 7.14; and DP32) on air quality.

Further details demonstrating compliance are contained in the Air Quality Assessment, which accompanies this application.

5.5.2 Noise

The effect of noise from construction will be controlled and managed to ensure impact on local amenity and public health is minimised (NPPF 11; DP26 and DP28). An environmental noise investigation and report has been carried out to ensure potential negative impacts are minimised and amenity is protected. It has been undertaken in line with national (NPPF 11; Noise Policy Statement for England), regional (London Plan Policy 7.15) and local (DP28; CS5) policy guidance. The report concludes that the proposed development is below the Council's noise threshold limits and that the proposed internal noise levels, recommended in BS8233, are likely to be feasible with acoustic glazing and attenuated passive ventilation to the front façade and conventional thermal double glazing and trickle ventilators to the rear.

The scheme would therefore comply with relevant policy (NPPF 11; DP26 and DP28). Further details demonstrating compliance are contained in the Noise Assessment, which accompanies this application.

5.5.3 Daylight and sunlight

To assess the potential impact of the development on daylight on neighbouring properties, a baseline daylight and assessment was undertaken. This included the Vertical Sky Component (VSC), No Sky Line (NSL) and Average Daylight Factor (ADF) for daylight and Annual Probable Sunlight Hours (APSH) for sunlight.

The development plan identifies that the Building Research Establishment report "Site Layout Planning for Daylight & Sunlight 2011" is the basis by which daylight and sunlight should be assessed.

Though there is a single isolated infringement of the NSC analysis, overall, the quality, quantity and distribution of light received by the neighbouring properties as a result of the development

proposals will remain fully BRE compliant. The Tottenham Street properties will all experience gains to the light levels they will receive as a result of the development proposals.

The scheme proposals demonstrate minimal impact on neighbouring residential amenity with only a single highly localised infringement of the BRE Guidance. Where this infringement of the daylight criteria occurs, the effects measured are not considered sufficiently adverse by the design team so as to make the light in rooms within the neighbouring properties unacceptable for their purpose.

5.5.4 Private open space

The new build office extension is located next to the gable end wall of Middlesex House and will provide an enclosed courtyard creating new private amenity space. Further private amenity space will be created at high level on the proposed annex and as roof terraces on the top floor (for use as residential and office). All residential units otherwise have terraces. New public open space will be created at the entrance of the new residential building, fronting Tottenham Mews.

The scheme has been designed to protect and enhance the quality of life of occupiers and neighbours through the provision of amenity spaces, whilst limiting harm to amenity in terms of privacy and overlooking, overshadowing and outlook, sunlight and daylight, noise and vibration, odour, fumes and dust and microclimate (DP26). It follows the principles of the NPPF in “supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being” (NPPF 8). The London Plan (2011) further highlights the need for the protection and enhancement of amenity for residents, building occupiers and the environment in general (Policy 7.6), which is reinforced in the adopted Core Strategy (CS6).

5.6 Sustainable environment

The scheme follows the guiding principles outlined in the NPPF, which highlights the importance of conserving and enhancing the natural environment and ensuring that development meets the challenge of climate change (NPPF 10; 11). This can be achieved by increasing the incorporation of renewable and low carbon technologies through sustainable design and construction (DP22) whilst taking into account flood risk (DP23), biodiversity (CS15), waste (CS18) and contaminated land. In regard to local policy (DP22) the scheme has been designed to achieve BREEAM “very good” and Code for Sustainable Homes Level 4.

5.6.1 Sustainable design and construction

An aspect of delivering sustainable development is the reduction of carbon, in accordance with the following hierarchy: be lean (use less energy); be clean (supply energy efficiently); and be green (use renewable energy) (London Plan Policy 5.2). This is reflected by the NPPF core principles (Para.17 and Policy 10) suggesting new development should “take into account land form, layout, building orientation, massing and landscaping”. The Local Plan seeks to reduce carbon emissions in line with the national target of 80% by 2050 (CS13). In achieving this target, the Council’s policy requires all new development to provide 20% reduction of carbon dioxide emissions through on-site renewable energy generation, where feasible (CS13). Though the London Plan requirement is for a 40% reduction (Policy 5.1 and 5.2), the Sustainable Design and Construction SPG (2014) states that the revised target is 35% against 2013 building regulations.

The proposed development seeks to be as low energy as possible, achieving the required energy credits for BREEAM 'very good' and Code for Sustainable Homes level 4. However, the 35% improvement over the Part L 2013 notional building has not been met – a shortfall of 11%. An energy strategy has been developed to ensure the scheme follows planning policy guidance for the promotion of high environmental standards to tackle climate change (NPPF 10; CS13), minimising carbon dioxide emissions (London Plan Policy 5.2), sustainable design and construction (London Plan Policy 5.3; DP22), decentralised energy (London Plan Policy 5.6) and renewable energy (London Plan Policy 5.7).

The '*be lean, be clean, and be green*' mantra has been incorporated through the design stages of the proposed developed and will consequently offer the following:

Be lean – Achieved through passive design such as: energy efficient building systems; high performance thermal façades; reduced direct solar gain through the incorporation of balconies; high efficiency glazing; enhanced envelope air tightness; passive solar gain; and low energy lighting;

Be clean – Combined Heat and Power (CHP) and Combined Cooling Heating and Power (CCHP) were deemed unfeasible. However, capped pipework to the plant rooms will be in place to enable a future connection to a district heating and cooling network.

Be green – Achieved through the incorporation of zero carbon technologies, with photovoltaics located on the building rooftop L08 – 127 sq.m. for the offices and 29 sq.m. for the residential development. These will be situated at an appropriate angle so they cannot be seen from the street and therefore do not detract from the architectural vision of the scheme. Air source heat pumps will provide heat and hot water for residential units and offices – located on L05 roof for the commercial and L08 for the residential development. Additionally, the commercial offices will be cooled by an air cooled Turbocor chiller.

In regard to climate adaptation the proposed scheme has been designed to incorporate effective ventilation, allowing for extremes in weather and temperature when calculating the buildings cooling and heating loads (including the provision of space for future enhancements in line with London Plan Policy 5.9), thermal mass, along with building form and orientation. Furthermore, the proposed layout of the residential units and extended elevations mean that the scheme has been designed to maximise the natural daylight and ventilation into the units and internal cores and therefore, limit heat energy usage.

Further information demonstrating that the Stage 2 actions contributing to the targeted BREEAM credits have been completed can be found in the Sustainability and Energy Statement, which accompanies this application.

5.6.2 Biodiversity

A preliminary ecological appraisal has been conducted in association with BREEAM requirements. The report confirms that the site is not subject to any statutory or non-statutory conservation designations, has low potential for supporting roosting bats or breeding birds. However the proposed development has the potential to support protected species. To accord with relevant legislation (EC Habitats Directive), policy (NPPF 11; London Plan Policy 2.18; 5.11; 5.13 and 7.19; and CS15) and best practice, site mitigation will be implemented.

Although the site should not directly impact any ecology or biodiversity the development will respond to the natural assets of its surroundings, given its limited or nil effect on any areas of importance, in accordance with local policy (DP24 and CS15).

Further details can be found in the ecology report, which accompanies this application.

5.6.3 Waste

In accordance with the Core Strategy (CS18), adequate waste and recycling facilities for storage and collection will be provided. The proposals include suitable bin storage for both commercial and residential uses at a ground level servicing area; this will include appropriate facilities for refuse and recycling. A waste management strategy will be implemented to account for the further waste space allocated at basement level, and where separate refuse storage is located for office and residential use. The scheme has been designed to incorporate a service lift as well as a vehicle delivery bay located along Tottenham Mews, close to the storage area – in accordance with the Council's waste requirements. All waste will be collected on a weekly basis.

For further information refer to the Design and Access Statement, accompanies this application.

5.6.4 Ground conditions

In accordance with policy (NPPF 11; London Plan Policy 5.21; and CS16), a Phase 1 investigation has been conducted on the site to determine potential ground condition constraints. The site is situated in Flood Zone 1 and is close to an area susceptible to ground water flooding (50m); however, it is protected by tidal flood defences. The outcome of the report classifies the site as low risk in regard to contamination; however, nearby uses have been highlighted as a potential source for contamination.

The accompanying assessment notes that there is groundwater on site and confirms that there is no contamination risk for future site users. Moreover, both sampling of water in the basement along with vapour monitoring to ensure exposure risks to potential contaminants is recommended along with the requirement for any imported soils to be chemical compliant.

In regard to mitigating flood risk (which is low probability), permeable landscaping materials will be used to reduce surface run-off where possible. This design approach is in line with policy in the NPPF, London Plan and the Council adopted plan (NPPF 10.94, London Plan Policy 5.12; DP22 and CS13). There will be no increase in surface water runoff to the existing drainage systems as a result of the proposed scheme. As a result, the scheme accords the requirements set out in regional and local policy (London Policy 5.11; 5.13; and DP23; CS13)

Further details can be found in the Phase 1 Desktop Study Ground Conditions Report, which accompanies this application.

In accordance with local policy (CPG4; DP27) a preliminary basement impact assessment has been conducted in order to “assess whether any predicted damage to neighbouring properties and the water environment is acceptable or can be satisfactorily ameliorated by the developer” (DP27.3). The assessment concluded that a Basement Impact Assessment is not required as part of the planning application for this development. Prevailing ground conditions and surface water or groundwater regimes will not be impacted by the proposed basement development, as there are no proposed changes (other than minor alterations) to the basement footprint/extent.

Further details of this investigation can be found in Appendix 1.

5.7 Transport and accessibility

A transport assessment and travel plan have been produced for the proposed scheme, in accordance with regional policy (London Plan Policy 6.3; 6.12). The plan supports the inclusion of sustainable transport modes (NPPF 4; DP16), with particular priority given to pedestrian and cycle movements (DP17). The needs of all to create safe and secure streetscape designs are considered within national (NPPF 4) regional (London Plan Policy 6.10B; 6.13; 7.3) and local (CS3; CS11) policies.

The proposed scheme aims to meet policy guidance with the provision of 63 cycle spaces, with appropriate shower facilities, and will operate as 'car-free' (DP17; and DP18). A travel plan has been developed to ensure that future residents and employees are made aware of the wide range of sustainable transport modes available, whilst promoting the need for appropriate facilities.

In conclusion, the development is supported by transport planning policies at all spatial scales and will not give rise to any transport impacts. A monitoring report will also be conducted and submitted to London Borough of Camden for review biennially.

Further detail regarding transport and accessibility can be found in the Transport Assessment and Travel Plan, which accompany application.

6.0 CIL and Planning Obligations

The scheme provides a level of affordable housing in compliance with the relevant policy (DP3) and therefore no affordable housing viability appraisal is required.

While the scheme is liable to pay the London Mayor's CIL, the applicant also anticipates that the Council will wish to enter into a S106 Agreement to secure, amongst other things, the proposed level of affordable housing. It is noted that the Council may implement a CIL charge during the life of this application.

In accordance with local policy (CS19) the applicant anticipates the use of planning obligation in dealing with the following:

- Car free development;
- The level of Affordable Housing;
- Construction / Servicing Management Plans;
- CfSH 'level 4' minimum and BREEAM 'very good' minimum;
- Energy Statement;
- Travel Plan; and
- Construction Workers Training and Recruitment Package.

7.0 Conclusion

The proposed development complies with the development plan in supporting the refurbishment and extension of Arthur Stanley House.

It is an opportunity to provide both market and affordable housing, a current challenge identified by the London Borough of Camden. It will help to deliver the principles of community cohesion and place making, providing new and high quality housing suitable for a mix of households, with provision of private amenity spaces and facilities such as cycle spaces, whilst meeting needs of those who require wheelchair access.

The proposed development also meets aspirations set by the Local Development Framework for a mixed use development that contributes to economic development through the provisions of office space, with availability for small and medium sized enterprises.

Based on the detail contained within this document and supporting assessments, it is apparent that the proposed development would contribute to making Camden a “unique, successful and vibrant place to live, work and visit” (Strategic Objective 1; and CS9).

The proposed development has been discussed with Officers at the London Borough of Camden. In addition, the applicant has held consultation events for local residents and stakeholders to view and comment on the proposal of which the outcome demonstrates that there is support for this development.

In light of the above, we therefore request that planning permission be granted for this proposal.

Appendix

Appendix 1



London Borough of Camden
2nd Floor,
5 Pancras Square
c/o Town Hall,
Judd Street
London
WC1H 9JE

19 January 2015

Our Ref: 62732L1.docx

Dear Sir / Madam

Re: Arthur Stanley House, Tottenham Street, London, W1T

The above property currently comprises an eight storey former hospital building with an existing two storey basement that fronts onto Tottenham Street. Our client is submitting a planning application in support of a proposal in part to redevelop the Site and in part to refurbish the existing building. As part of this they have commissioned ESI Ltd (ESI) to look at any potential implications the development may have specifically in relation to the requirements of London Borough of Camden Planning Guidance for Basements and Lightwells (CPG4) which is underpinned by London Borough of Camden Development Policy DP27 Basements and lightwells. This guidance and policy applies to all developments in Camden that propose a new basement development, or an extension to existing basement accommodation where planning permission is required. Under this guidance a Basement Impacts Assessment (BIA) is required in order to assess whether any predicted damage to neighbouring properties and the water environment is acceptable or can be satisfactorily ameliorated by the developer as stated in DP27.3.

In accordance with the above guidance and in relation to the proposed development we have reviewed the available existing and proposed development drawings and would note the below key items:

Proposed Development

Whilst much of the project shall comprise the refurbishment of existing structures, it is proposed to construct a new multi-storey building in the northern portion of the Site which is currently occupied by a low rise building. As part of these works the basement shall remain but additional piled foundations will be progressed below the slab level (marked H on the plan in Appendix A). The piles shall found in the underlying London Clay Formation or Lambeth Group at depth and will typically be constructed in groups below a pile cap. However, they will not be contiguous (such as secant methods) and account for less than 10% of the extent of the area of the existing basement. The connecting ground beams shown on the drawing shall be cut into the existing slab but not interact with the River Terrace Deposits below.

Proposed Basement Refurbishment Alterations

As part of the overall scheme (see appended development plans) it is intended to make minor alterations to the existing finished level within the basement including the provision of a new slab (to be placed over the existing slab level, see drawing in Appendix A) and the installation of two new lift pits. The lift pits (which will comprise less than 3% of the extent of

the existing basement - see Appendix B) shall extend approximately 700mm below the underside of the existing slab and remain well within the underlying River Terrace Deposits (see logs in Appendix C).

Conclusions

With the exception of the above, no changes to the extent or overall footprint of the basement are proposed. Therefore, it is considered that the lift pits and piling do not constitute an extension to the existing basement and that the proposed development will not cause any adverse impacts to the prevailing ground conditions, surface or groundwater regimes. Therefore, as there is neither a new basement proposed nor an extension of the existing basement, it is considered that a Basement Impact Assessment is not required as part of the planning application for this proposed development.

We trust that this letter and appended development plans meet with your satisfaction. However, should you have any questions regarding the scheme, please do not hesitate to contact us.

Yours faithfully,



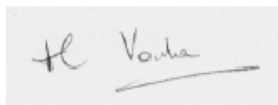
Tim Taylor

Project Engineer

Email: timtaylor@esinternational.com

Tel: 01743 276 100

In accordance with the London Borough of Camden policy and guidance this letter and supporting data has been reviewed and countersigned as follows:



Helen Vonka (CIWEM)	Howard Clarke (BEng PhD CEng MICE MIStructE)	Joe Gomme (CGeol)
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