

6 STUKELEY STREET, LONDON WC2

APPLICATION FOR PLANNING PERMISSION FOR  
DEMOLITION OF EXISTING BUILDING  
AND ERECTION OF TWO DWELLINGHOUSES

PLANNING STATEMENT

1 INTRODUCTION

- 1.1 The application seeks full planning permission for the demolition of the existing single-storey building at 6 Stukeley Street and the redevelopment of the site with two houses on four floors including basement. Each dwelling would comprise a two-bedroom, four-person house, one providing 104 square metres of floorspace and the other 110 square metres of floorspace.
- 1.2 The property lies on the south-east side of Stukeley Street, 20 metres east of its junction with Drury Lane. Stukeley Street is narrow at its western end and pedestrianised between Drury Lane and 8 Stukeley Street.
- 1.3 6 Stukeley Street is not a statutorily listed building and there are no listed buildings adjacent to or opposite the site. The property lies within the Covent Garden Conservation Area.
- 1.4 The building has been in use as a dwellinghouse, under Class C3 of the Use Classes Order 1987, since the applicant purchased the property in 2007 and it is understood that it had been used as a dwelling by the previous owner, The St Pancras Housing Association.

1.5 This Planning Statement, which addresses the planning merits of the proposal in the context of the relevant planning policies, should be read in conjunction with the other application documents, including:

- . Design and Access Statement;
- . Heritage Statement;
- . Daylight and Sunlight Assessment; and
- . Basement Impact Statement and associated Ground Investigation Report and Hydrogeology and Land Stability Report.

## 2 LEGAL FRAMEWORK

2.1 The application property is an unlisted building within the Covent Garden Conservation Area. The relevant legislative requirements are summarised below.

2.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with adopted development plan policies, unless material considerations indicate otherwise.

2.3 The site is in a designated conservation area and the Council will be aware of the duty imposed by section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to ensure that new development should preserve or enhance the character or appearance of the Conservation Area.

## 3 PLANNING POLICIES

3.1 The development plan consists of:

- . The London Plan 2011, as subsequently amended;
- . Camden Core Strategy 2010; and
- . Camden Development Policies 2010.

- 3.2 The following non-statutory planning guidance is also relevant to this proposal:
- . Camden Planning Guidance: Basements and Lightwells CPG4 dated July 2015; and
  - . Mayor of London's Supplementary Planning Guidance on Housing (2012).

3.3 Also of relevance is the national guidance on planning set out in the National Planning Policy Framework 2012.

3.4 I set out below a summary of the local policies that I consider relevant to this proposal.

#### The London Plan

3.5 *Policy 3.3 – Increasing Housing Supply*

This policy confirms "the pressing need for more homes in London" and urges the boroughs "to achieve and exceed the minimum borough annual average housing target in Table 3.1". The policy notes, in particular, the potential to realise brownfield housing capacity through suitable intensification of development. The housing provision target for Camden, as indicated in the Alterations to The London Plan of January 2014, is given as 8,892 additional dwellings, or 889 per annum.

3.6 *Policy 3.4 – Optimising Housing Potential*

This policy states that development should optimise housing output for different types of location within the relevant density range shown in table 3.2. (The application of density guidelines is of limited relevance to the redevelopment of a small site with two dwellings).

3.7 *Policy 3.5 – Quality and Design of Housing Development*

This requires new housing developments to enhance the quality of local areas taking into account context, character, density and land-use mix, and recommends that housing should conform to minimum space standards set out in table 3.3.

3.8 *Policy 6.13 – Parking*

This policy requires developments to comply with the maximum (not minimum) parking standards set out in table 6.2. Paragraph Eb of the policy states:

“In locations with high public transport accessibility, car-free developments should be promoted.”

3.9 *Policy 7.4 – Local Character*

Policy 7.4 requires new buildings to provide a high quality design that has regard to the existing urban grain in terms of scale, proportion and mass, and makes a positive contribution to the character of the area.

3.10 *Policy 7.6 – Architecture*

This requires that buildings:

- . be of the highest architectural quality;
- . use design and materials that complement, not necessarily replicate, local character;
- . not cause unacceptable harm to the amenity of neighbouring buildings in relation to privacy and overshadowing;
- . provide high-quality indoor space and integrate well with surrounding streets; and
- . optimise the potential of sites.

3.11 *Policy 7.8 – Heritage Assets*

This policy seeks to sustain and enhance the significance of heritage assets, including conservation areas, and requires that new development should “conserve, restore, re-use and incorporate heritage assets” and be “sympathetic to their form, scale, materials and architectural detail”.

Camden Core Strategy

3.12 *Policy CS6 – Providing Quality Homes*

This housing policy states that the Council will make full use of the Borough’s capacity for housing by:

- . maximising the supply of housing over the plan period (2010-2025) to meet or exceed the target of 8,925 homes;
- . minimise the net loss of housing;
- . regarding housing as the priority land use.

3.13 *Policy CS14 – Promoting High Quality Places and Conserving our Heritage*

This states that the Council will ensure that buildings are attractive by:

- requiring development of the highest standard of design that respects local context and character; and
- preserving and enhancing heritage assets including conservation areas.

Camden Development Policies

3.14 *Policy DP2 – Making Full Use of Capacity for Housing*

This policy seeks to maximise the supply of housing by:

- expecting the maximum appropriate contribution to housing supply on sites that are underused or vacant; and
- resisting the alternative use of sites that are considered suitable for housing.

3.15 *Policy DP18 – Parking Standards and Limiting Car Parking Availability*

This policy states that the Council will seek to ensure minimum parking provision for new schemes and will expect developments to be car-free in the central London area. The policy also requires, for car-free developments, the developer to enter into a planning obligation to ensure that occupiers do not apply for on-street parking permits.

3.16 *Policy DP24 – Securing High Quality Design*

This requires development to be of the highest standard of design and expects the following factors to be considered:

- the character, setting, context, form and scale of neighbouring buildings;
- the quality of materials to be used;
- the provision of visually interesting frontages; and
- the provision of appropriate amenity space.

3.17 *Policy DP25 – Conserving Camden’s Heritage*

This policy states, with regard to conservation areas, that the Council will:

- “ only permit development within conservation areas that preserves and enhances the character and appearance of the area;

- . prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;”

### 3.18 *Policy DP26 – Impact of Development on Occupiers and Neighbours*

This policy states that the Council will only grant planning permission for development that does not harm amenity and lists factors that include:

- “a) visual privacy and overlooking;
- b) overshadowing and outlook;
- c) sunlight, daylight and artificial light levels;
- h) an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;”

With regard to item c), the text accompanying the policy states that the Council will take into account the BRE document *Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice* (1991).

### 3.19 *Policy DP27 – Basements and Lightwells*

This basement development policy states:

“..... The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability. We will require developers to demonstrate by methodologies appropriate to the site that schemes:

- a) maintain the structural stability of the building and neighbouring properties;
- b) avoid adversely affecting drainage and run-off or causing other damage to the water environment;
- c) avoid cumulative impacts upon structural stability or the water environment in the local area;

and we will consider whether schemes:

- e) lead to the loss of open space or trees of townscape or amenity value;
- f) provide satisfactory landscaping, including adequate soil depth;

- g) harm the appearance or setting of the property or the established character of the surrounding area; and .....

#### Camden Planning Guidance CPG4 – Basements and Lightwells

3.20 This guidance document, which is not part of the Local Development Framework, supports and clarifies policy DP27. The following parts of CPG4 are of particular relevance to this application.

- . The Council prefers basements to not extend beyond the footprint of the building and to be no deeper than one storey below ground level.  
(paragraph 2.6)
- . No objection, in principle, is raised to the construction of basements in conservation areas.  
(paragraphs 2.9 to 2.11)
- . New lightwells should be discreet and not harm the character and appearance of the building.  
(paragraph 2.19)
- . A Basement Impact Assessment (BIA) is required in order to establish that the proposed basement would not harm the built environment, local amenity, the water environment, ground conditions and biodiversity.  
(paragraph 3.1)
- . The BIA should contain a “non-technical summary” of the evidence.  
(paragraph 3.5)
- . A Construction Management Plan will generally be required for basement developments in conservation areas in order to minimise any impact of construction on local amenities.  
(paragraphs 2.11 and 4.3)

#### 4 THE NATIONAL PLANNING POLICY FRAMEWORK

4.1 I set out below those parts of the guidance in the NPPF that I consider material to this application.

## Section 7 - Requiring Good Design

### *Paragraph 58*

- 4.2 "..... Planning policies and decisions should aim to ensure that developments:
- . will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
  - . establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
  - . optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
  - . respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
  - . create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
  - . are visually attractive as a result of good architecture and appropriate landscaping."

### *Paragraph 59*

- 4.3 "Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally."

### *Paragraph 60*

- 4.4 "Planning 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. It is, however, proper to seek to promote or reinforce local distinctiveness."



## Section 12 - Conserving and Enhancing the Historic Environment

4.5 Section 12 of the NPPF provides guidance on the conservation of the historic environment. This guidance sets out the matters that should be taken into account when considering planning applications (see paragraph 131) and stresses that the need to conserve to the heritage asset must be balanced against any substantial public benefits of the proposal.

4.6 Paragraphs 126 and 131 state that when developing their strategy towards conservation and heritage and when deciding planning applications, local planning authorities should take into account, amongst other aims:

“the desirability of new development making a positive contribution to local character and distinctiveness.”

4.7 Paragraph 134 of the NPPF states:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”

## 5 PLANNING MERITS

5.1 The main planning issues are considered to be as follows:

- . the principle of the development;
- . design and townscape;
- . heritage considerations;
- . the quality of the accommodation;
- . basement considerations;
- . car parking; and
- . effect on neighbouring properties.

### The principle of the development

- 5.2 The NPPF, the London Plan and the Camden Local Development Framework stress the importance of making efficient use of previously-developed land for housing and increasing housing supply. The redevelopment of the property, the lawful use of which is housing, with two dwellings would make a valuable contribution towards the supply of housing in Camden, resulting in the net increase of one in the number of dwelling units on the site.
- 5.3 It is arguably inappropriate to apply the broad density guidelines set out in the London Plan to a small site such as this. However, under policy 3.4 (and table 3.2), the appropriate density range for a central site with a PTAL of 6 is 650 to 1,100 habitable rooms per hectare. The proposed development would represent a density of 1,070 habitable rooms per hectare and is therefore within the density range considered appropriate under the policy.
- 5.4 The proposal is therefore consistent with the following housing policies:
- London Plan policy 3.3;
  - London Plan policy 3.4;
  - Core Strategy policy CS6; and
  - Development Policies policy DP2.

### Design and townscape

- 5.5 A full description of the location of the property, its townscape context and the significance of the heritage asset (i.e. the Covent Garden Conservation Area) is given in the Heritage Statement prepared by Milan Babic Architects. Therefore, in terms of information supplied, the application documents comply with the requirements of paragraph 128 of the NPPF.
- 5.6 The townscape context of the site is described in the Design and Access Statement and the Heritage Statement and may be summarised as follows.
- The application property, a single-storey, white-painted brick building with a slate pitched roof behind a parapet wall, is flanked to the south-west by a two-storey building and to the north-east by a three-storey building.
  - Opposite the site is a five-storey building of contemporary design.
  - Stukeley Street is characterised by a wide variety of building styles and, in contrast to other parts of the Conservation Area, there is no uniformity in the

street scene, whether in terms of building heights, proportions, fenestration, architectural detailing, building materials or colour (see figures 2, 5 and 7 in the Design and Access Statement).

- 5.7 The design of the proposed houses, in terms of their overall height, storey heights, proportions and external materials is informed by the immediate townscape context.
- 5.8 The existing single-storey building appears incongruous within a street consisting of two-, three- and five-storey buildings. The proposed building comprising the two houses would represent an appropriate and beneficial transition between (looking from the street) the three-storey building to its left and the two-storey property to its right. The storey heights and horizontal alignment of fenestration within the new houses would respect the neighbouring buildings and provide a visual continuity that is presently lacking.
- 5.9 The proposed white brick elevation at ground and first floor would represent an appropriate replacement of the white-painted front of the existing building and would also help to increase light reflection in this narrow and relatively dark street. The mansard roof, set back behind a parapet wall, would be clad in natural slate to correspond with the roof materials used on adjacent buildings. The dividing spine wall between the two new houses would be apparent at roof level, providing a vertical emphasis to the building that is appropriate to this part of the street.
- 5.10 It is considered that the design of the proposed houses is well-conceived and appropriate to the context of the site, and is compliant with policies 7.4 and 7.6 of the London Plan, policy CS14 of the Core Strategy, policy DP24 of the Development Policies and section 7 of the NPPF.

#### Heritage considerations

- 5.11 The Heritage Statement prepared by Milan Babic Architects sets out, in line with the requirements of section 12 of the NPPF, the history and significance of the heritage asset (the Conservation Area) in which the site is located and the effect of the proposed development on the significance of the heritage asset.
- 5.12 The opinion of the project architects, which I share, is that the existing building has low architectural merit, makes no significant contribution to the character of the Conservation Area and that there are no heritage reasons to oppose the demolition of the property and its replacement with a well-designed building suited to its setting.

- 5.13 The proposed development of two houses, for the reasons explained in the Design and Access Statement, the Heritage Statement and at paragraphs 5.6 to 5.10 above, would make a positive contribution to local character and distinctiveness within the Conservation Area, thereby furthering the aims of paragraphs 126 and 131 of the NPPF.
- 5.14 The project architects make reference to a contemporary development in the immediate area (14 Stukeley Street) which is also within the Covent Garden Conservation Area, and which received a design award in 1999. This illustrates that a contemporary approach to redevelopment, if designed and constructed to the highest standard, is compatible with the preservation and, indeed, the enhancement of conservation areas.
- 5.15 With regard to the NPPF guidance on heritage matters (see paragraphs 4.5 to 4.7 above), I consider that the proposed development would substantially enhance the character and appearance of the Covent Garden Conservation Area and that no harm to the significance of that heritage asset would be caused. It is therefore unnecessary to consider whether the proposal would produce any public benefits that might outweigh any harm caused; but, had it been necessary to do so, I would argue that a clear public benefit of this proposal is the provision of much-needed additional housing, in line with national and local planning policy (see paragraph 5.2 above).
- 5.16 For the reasons explained above, the proposed development would be appropriate in heritage terms and would accord with the following policies and requirements:
- . section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990;
  - . The London Plan policy 7.8
  - . Core Strategy policy CS14;
  - . Development Policy policy DP25; and
  - . NPPF section 12.

#### Quality of the accommodation

- 5.17 The London Plan policy 3.5 places a significant new focus on internal space standards for dwellings. The purpose of the policy is to ensure that all new homes are fit for purpose and offer the potential to be occupied over time by households of all tenure. The London Plan table 3.3 and Housing SPG baseline standard 4.1.1 set out the minimum gross internal area for new homes.

- 5.18 Neither the London Plan nor the housing SPG provide a floorspace standard for two-bedroom, four-person houses with three storeys, but the proposed dwellings would comply with the standard applicable for a three-bedroom, four-person, three-storey unit, which is 93 square metres. The two dwellings proposed on this site would provide 104 square metres and 110 square metres of floorspace.
- 5.19 The existing dwelling has no external amenity or garden space. The proposed replacement building would occupy the same footprint as the existing building and no amenity space is therefore possible. The limited size of the site and the need, for townscape and heritage reasons, to maintain a continuous built-up frontage does not allow any part of the site to be used for amenity purposes. Furthermore, it would be inappropriate, for reasons of design and overlooking, to provide balconies or roof terraces.
- 5.20 For the above reasons the proposal would provide a good standard of residential accommodation and would accord with policy 3.5 of the London Plan and the standards set out in the Housing SPG.

#### Basement considerations

- 5.21 The proposed redevelopment of the site includes the provision of basement accommodation. The Council's policies require the submission of a Basement Impact Assessment to demonstrate that basement development would:
- (i) maintain the structural stability of neighbouring buildings;
  - (ii) avoid adversely affecting drainage or the water environment;
  - (iii) not harm the amenity of neighbours;
  - (iv) not lead to the loss of open space or trees; and
  - (v) not harm the appearance or setting of the property or the character of the surrounding area.
- 5.22 The application is accompanied by a detailed Basement Impact Assessment by Croft Structural Engineers. Camden Planning Guidance on Basements and Lightwells (CPG4) requires the BIA to include a non-technical summary of the evidence and this is provided by the project architects, Milan Babic Architects, in their Design and Access Statement. This summary confirms that the proposed basements would be acceptable in terms of items (i) and (ii) of the preceding paragraph. With regard to item (iii), the amenity of neighbours can be protected through compliance with a Construction Management Plan (see paragraph 5.28 below). Regarding item (iv), there are no open spaces or trees on or adjacent to the site. With respect to item (v),

the proposed basements would not be visible from the street and the development as a whole would not, as argued in some detail in this Planning Statement, in the Design and Access Statement and in the Heritage Statement, harm the character or appearance of this part of the Conservation Area.

- 5.23 It is relevant to note that a single-storey basement could be constructed under the footprint of the existing building without the need for planning permission from the Council as such works would be permitted development under Class A of Part 1 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015.
- 5.24 For the above reasons the proposed development would comply with the requirements of policy DP27 of the Camden Development Policies and the Camden Planning Guidance CPG4.

#### Car parking

- 5.25 The existing building, which is in residential use, has no off-street car parking facilities. The proposed development includes no car parking space. In view of the highly accessible central location of the site, within 500 metres of three underground stations (the site has a PTAL rating of 6b), a car-free development is not only acceptable but also desirable, having regard to the provisions of London Plan policy 6.13 and Camden Development Policies policy DP18.

#### Effect on neighbouring properties

- 5.26 I consider that there are two issues with respect to potential impact on the amenities of neighbouring properties:
- . the effect of the new building on daylight and sunlight reaching windows in neighbouring buildings; and
  - . the impact on neighbours during the construction phase, in terms of noise and disturbance.
- 5.27 The first of these issues has been addressed in the Daylight and Sunlight Assessment prepared by T16 Design. It will be noted that the proposed development satisfies the technical guidance in the BRE report 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice'. Whilst the BRE guidance does not have the status of statutory development plan policy, it is a nationally recognised standard and is a material planning consideration. The report shows that, following the construction of

the proposed building, the 33 assessed windows in nearby properties would all easily meet the minimum 80% daylight criteria and all 28 windows within 90° of south would achieve the necessary standard for sunlight. Also, internal daylight levels for the proposed houses would meet the recommended standards.

- 5.28 With regard to the second issue, any planning permission would be expected to include a planning condition requiring the submission of a Construction Management Plan and any impacts on neighbouring properties during construction can be minimised by compliance with that Plan (see paragraph 3.20 above).
- 5.29 For the above reasons the proposal would have no harmful effects on neighbouring properties and would comply with Camden Development Policies policy DP26.

## 6 CONCLUSION

- 6.1 For the reasons set out in this Statement, the proposed redevelopment of this site with two dwellings would:
- . be appropriate in principle;
  - . be suitable in its design and its effect on the street scene;
  - . enhance the character and appearance of the Conservation Area;
  - . provide a very good standard of accommodation;
  - . comply with the Council's basement criteria;
  - . give rise to no car parking objections; and
  - . not harm the amenities of living conditions of neighbouring occupiers.
- 6.2 The Council is therefore invited to grant planning permission subject to appropriate planning conditions.

ANTHONY R J KEEN  
BA MSc DipTP DipPhil MRICS MRTPI

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