

Delegated Report		Analysis sheet		Expiry Date:	31/05/2017
		N/A / attached		Consultation Expiry Date:	11/05/2017
Officer			Application Number(s)		
Kate Henry			2017/1968/P		
Application Address			Drawing Numbers		
20 Flaxman Terrace London WC1H 9AT			Refer to Draft Decision Notice		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature		
Proposal(s)					
Erection of single storey roof extension at second floor level to provide 233sqm additional office space (Class B1a), with associated cycle parking and refuse storage					
Recommendation(s):		Refuse planning permission			
Application Type:		Full Planning Permission			

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice					
Informatives:						
Consultations						
Adjoining Occupiers:	No. notified	00	No. of responses	3	No. of objections	3
Summary of consultation responses:	<p>A site notice was displayed on 14/04/2017 (expiry date 11/05/2017) and a notice was placed in the local press on the same date (expiry date 11/05/2017).</p> <p>Responses have been received from 3 different properties. The comments are summarised as follows:</p> <ul style="list-style-type: none">• Wallspace at 22 Dukes Road are on offsite meeting venue which depends on quiet environment. Having a building site so close would impact on ability to trade.• Residents of Flaxman Court would be unduly affected by construction works (cumulative effect of all the building works in area recently)• Developer has refused to provide sunlight and daylight report; there will be harm to properties in Grafton Mansions					
Bloomsbury CAAC	No comments received (consultation expiry 02/05/2017).					

Site Description

The building at 20 Flaxman Terrace comprises two parts; the original 1900's warehouse building and a later front and side extension (1950's) which fronts onto Flaxman Terrace. The building is between 2 and 3 and a half storeys tall above ground level. There are basements within each separate element of the building.

The part of the building which fronts onto Flaxman Terrace (the modern element) features yellow bricks, white render, Crittall windows and continuous glass block banding at street level to allow light into the lower floors.

The application site is within the Bloomsbury Conservation Area. Neither part of the building is listed. Nearby listed buildings include 17 Duke's Road (Grade II) and Flaxman Lodge and attached railings (Grade II).

Relevant History

2016/0788/P - Erection of single storey roof extension to provide 226sqm additional office space (Class B1a) and associated works – **Refused 23/01/2017 (Appeal lodged)**

Council's reasons for refusal:

- 1. The proposed roof extension, by virtue of its siting, size, detailed design and appearance, would cause harm to the character and appearance of the host building, the street scene along Flaxman Terrace and the Bloomsbury Conservation Area, as well as harm to the setting of nearby listed buildings (17 Duke's Road and The Lodge on Flaxman Terrace), contrary to policy CS14 (Promoting high quality places and conserving our heritage) of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 (Securing high quality design) and DP25 (Conserving Camden's heritage) the London Borough of Camden Local Development Framework Development Policies.*
- 2. The applicant has failed to satisfactorily demonstrate that the proposed development would take measures to minimise the effects of, and adapt to, climate change through sustainable design and construction measures, contrary to policy CS14 (Tackling climate change through promoting higher environmental standards) of the London Borough of Camden Local Development Framework Core Strategy and policy DP22 (Promoting sustainable design and construction) of the London Borough of Camden Local Development Framework Development Policies.*
- 3. The proposed development, in the absence of adequate justification to demonstrate the provision of an appropriate contribution towards the supply of housing onsite, and the subsequent absence of a legal agreement to secure an appropriate contribution towards the supply of housing offsite, would fail to make adequate provision to the borough's strategic affordable housing targets, contrary to policies CS6 (Providing quality homes) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and DP1 (Mixed use development) and DP3 (Contributions to supply of affordable housing) of the London Borough of Camden Local Development Framework Development Policies.*
- 4. The proposed development, in the absence of a legal agreement securing a construction management plan, would be likely to give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies CS5 (Managing the*

impact of growth and development), CS11 (Promoting sustainable and efficient travel) and CS19 (Delivering and monitoring the Core Strategy) of the London Borough of Camden Local Development Framework Core Strategy and policies DP20 (Movement of goods and materials), DP21 (Development connecting to highway network) and DP26 (Managing the impact of development on occupiers and neighbours) of the London Borough of Camden Local Development Framework and Development Policies.

PSX0104610 - The change of use of the basement and ground floor from Class B1(a) light industrial to Class B1(a) offices without complying with condition 1 of planning permission PL8601583 dated 19 May 2001 under the meaning of the Town and Country Planning (Use Class) Order 1985 – **Granted 24-07-2001.**

8601583 - Continued use for University purposes – **Granted 14-05-1987.**

Relevant policies

LDF Core Strategy and Development Policies

National Planning Policy Framework (2012)

London Plan (2016)

LDF Core Strategy and Development Policies (2010)

CS1 Distribution of growth

CS3 Other highly accessible areas

CS5 Managing the impact of growth and development

CS6 (Providing quality homes)

CS8 Promoting a successful and inclusive Camden economy

CS9 Achieving a successful Central London Borough of Camden

CS10 Supporting community facilities and services

CS11 Promoting sustainable and efficient travel

CS13 Tackling climate change through promoting higher environmental standards

CS14 Promoting high quality places and conserving our heritage

CS18 Dealing with our waste and encouraging recycling

CS19 Delivering and monitoring the Core Strategy

DP1 Mixed use development

DP2 Making full use of Camden's capacity for housing

DP3 Contributions to the supply of affordable housing

DP12 Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses

DP13 Employment sites and premises

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 DP24 Securing high quality design

DP20 Movement of goods and materials

DP24 Securing high quality design

DP25 Conserving Camden's heritage

DP26 Managing the impact of development on occupiers and neighbours

DP28 Noise and vibration

Camden Planning Guidance

CPG1 Design (2015)

- Ch. 1 (introduction
- Ch. 2 Design excellence
- Ch. 3 Heritage
- Ch. 4 Extensions, alterations, conservatories
- Ch. 5 Roofs, terraces and balconies

CPG2 Housing (2015)

- Ch. 1 Introduction
- Ch. 2 Affordable housing and housing in mixed use development

CPG3 Sustainability (2015)

- Ch. 1 Introduction
- Ch. 2 The energy hierarchy
- Ch. 4 Energy efficiency: existing buildings
- Ch. 5 Decentralised energy networks and combined heat and power
- Ch. 6 Renewable energy
- Ch. 7 Water efficiency
- Ch. 8 Sustainable use of materials
- Ch. 9 Sustainability assessment tools
- Ch. 10 Brown roofs, green roofs and green walls
- Ch. 12 Adapting to climate change
- Ch. 13 Biodiversity

CPG5 Town Centres, Retail & Employment (2013)

- Ch. 1 Introduction
- Ch. 7 Employment sites and business premises

CPG6 Amenity (2011)

- Ch. 1 Introduction
- Ch. 4 Noise and vibration
- Ch. 5 Artificial light
- Ch. 6 Daylight and sunlight
- Ch. 7 Overlooking, privacy and outlook
- Ch. 8 Construction management plans

CPG7 Transport (2011)

- Ch. 1 Introduction
- Ch. 5 Car free and car capped development
- Ch. 6 On-site car parking
- Ch. 9 Cycling facilities

CPG8 Planning Obligations (2015)

- Ch. 1 Introduction
- Ch. 2 Background
- Ch. 3 Amenity
- Ch. 6 Affordable housing and housing in mixed-use development
- Ch. 7 Sustainability
- Ch. 8 Employment and business support
- Ch. 10 Transport

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

- Ch. 1 – Introduction

Ch. 3 – Summary of special interest

Character Analysis: Sub-Area 13: Cartwright Gardens/Argyle Square (pages 92-99)

Part 2: Management Strategy

Draft Camden Local Plan (2016)

The Inspector's report on the Local Plan was published on 15 May 2017 and concludes that the plan is 'sound' subject to modifications being made to the Plan. While the determination of planning applications should continue to be made in accordance with the existing development plan until formal adoption, substantial weight may now be attached to the relevant policies of the emerging plan as a material consideration following publication of the Inspector's report, subject to any relevant recommended modifications in the Inspector's report.

The following policies are considered to be relevant:

G1 Delivery and location of growth
H1 Maximising housing supply
H2 Maximising the supply of self-contained housing from mixed-use schemes
H4 Maximising the supply of affordable housing
C5 Safety and security
C6 Access for all
E1 Economic development
E2 Employment premises and sites
A1 Managing the impact of development
A4 Noise and vibration
D1 Design
D2 Heritage
CC1 Climate change mitigation
CC2 Adapting to climate change
CC3 Water and flooding
CC4 Air quality
CC5 Waste
T1 Prioritising walking, cycling and public transport
T2 Parking and car-free development
T4 Sustainable movement of goods and materials

Assessment

1. The proposal

1.1. This application seeks planning permission for the following:

- Single storey roof extension at second floor level to provide 233sqm (GIA) additional office space (Class B1a); with associated cycle parking and refuse storage

1.2. The proposed extension would sit above the 1950's modern element of the building (the part that faces Flaxman Terrace). It would cover the whole of the undeveloped part of the flat roof and would adjoin the existing 3 ½ storey element above the older, original 1900's warehouse building at the rear of the site.

1.3. The proposed roof extension would measure up to approximately 3.2 metres tall. The part at the front, which would be set back marginally from the front elevation of the host building,

would measure 2.5 metres tall. The roof would then step up by 0.8 metres for the remainder.

1.4. The proposed extension would be constructed with glazed panels.

1.5. The existing overhang at the front of the building would be retained and the proposed extension would sit above. The front elevation would align with the existing front elevation.

2. Background

2.1. This application follows planning application reference 2016/0788/P, which was refused on 23/01/2017 (appeal lodged). That application was for the following: Erection of single storey roof extension to provide 226sqm additional office space (Class B1a) and associated works.

2.2. The application was refused for 4 reasons (see relevant history section); namely the impact on the character and appearance of the host building, the street scene along Flaxman Terrace and the Bloomsbury Conservation Area, as well as harm to the setting of nearby listed buildings; the applicant's failure to satisfactorily demonstrate that the proposed development would take measures to minimise the effects of, and adapt to, climate change through sustainable design and construction measures; the absence of adequate justification to demonstrate the provision of an appropriate contribution towards the supply of housing onsite, and the subsequent absence of a legal agreement to secure an appropriate contribution towards the supply of housing offsite; and the absence of a legal agreement securing a construction management plan.

2.3. This application differs to the previous one insofar as it provides an additional 7sqm of floor space and the roof extension would be constructed with glazing panels instead of brick.

3. Assessment

3.1. The principal considerations material to the determination of this application are summarised as follows:

- The principle of development;
- Mixed use policy- housing contribution;
- Impact on the character and appearance of the wider area (including the Bloomsbury Conservation Area and the settings of nearby listed building);
- The impact on the visual and residential amenities of the occupiers of nearby and neighbouring residential properties;
- Transport considerations;
- Sustainability considerations;
- Planning obligations and CIL

4. The principle of development

4.1. The principle of development has already been established as acceptable at the time of the previous application. It was noted that Policies CS8 and DP13 seek to safeguard existing employment sites and premises in the borough that meet the needs of modern industry and other employers and Policy CS3 seeks to promote appropriate development in the highly accessible areas of Central London (outside of the designated Growth Areas), as these areas are considered to be suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities and are particularly suitable for uses that are likely to significantly increase the demand for travel.

5. Mixed use policy- housing contribution

- 5.1. Policy DP1 requires development in Central London which is creating more than 200sqm (gross) additional floor space to provide 50% of all floor space as residential floor space. The proposal would provide 233sqm of additional commercial floor space, and therefore 50% should be provided as residential floor space.
- 5.2. The Council will normally require any secondary uses to be provided on-site, particularly where 1000sqm (gross) of additional floor space or more is proposed. Housing provided as part of a mixed use scheme should be independent of other uses and have a separate access at street level, or other arrangements which provide for occupation independent of any non-residential use.
- 5.3. In this case, the applicant has failed to provide any comment on the provision of housing on-site or off-site, other than to note that at the time of the previous application it was acknowledged by Officers that the application site is unable to provide residential accommodation on site.
- 5.4. The applicant proposes to provide a payment-in-lieu of provision. They have provided an initial estimate of £81,550.
- 5.5. However, the Council disagrees with the proposed figure. It appears that the applicant has used gross internal floor area measurements, whereas the CPG guidance is based on gross external area measurements.
- 5.6. The proposal would provide 233sqm (GIA) of new floor space, which represents 291.25sqm GEA (i.e. multiply the GIA by 1.25, as per paragraph 6.13 of CPG8). Where a contribution to housing is sought under Policy DP1, CPG8 requires a payment of £700 per square metres multiplied by the on-site target for housing (in this case 50%), which equates to 145.63sqm. The proposed figure for the payment-in-lieu of housing is therefore £101,937.50. The applicant has failed to enter into a section 106 legal agreement to secure this, and the application is recommended for refusal on this basis.

6. Employment and business support

- 6.1. As noted above, Policies CS8 and DP13 of the LDF seek to safeguard existing employment sites and premises in the borough that meet the needs of modern industry and other employers.
- 6.2. Similarly, Policies E1 and E2 of the emerging Local Plan seek to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses; and by encouraging the provision of employment premises and sites in the borough and protecting premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy.
- 6.3. In order to maximise the opportunities for local residents and businesses afforded by the proposal, and in line with the aims of the LDF, the emerging Local Plan and the guidance in CPG8, the Council would expect to secure the following through a section 106 legal agreement:
 - The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per clause 8.28 of CPG8.

- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide a specified number (to be agreed) of construction or non-construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre.
- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction or non-construction apprentice per £3 million of build costs and pay the council a support fee of £1,700 per apprentice as per clause 8.25 of CPG8. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre.
- If the value of the scheme exceeds £1 million, the applicant must also sign up to the Camden Local Procurement Code, as per section 8.30 of CPG8.
- The applicant provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.

6.4. No information on the proposed build costs have been provided as part of the application; however, if the application was otherwise considered to be acceptable, the exact terms of the legal agreement could have been discussed and agreed.

6.5. The failure of the applicant to enter into a section 106 legal agreement to secure employment and business support obligations forms another reason for refusal.

7. Impact on the character and appearance of the Bloomsbury Conservation Area and the setting of nearby listed buildings

7.1. The application site is located within the Bloomsbury Conservation Area, wherein the Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area, in accordance with Section 72 of The Planning (Listed Buildings and Conservation Areas Act) 1990.

7.2. Nearby Grade II listed buildings include 17 Duke's Road and The Lodge and attached railings on Flaxman Terrace. The Council has a statutory duty, under Section 66 of The Planning (Listed Buildings and Conservation Areas) Act 1990, to have special regard to the desirability of preserving a listed building(s) or its setting or any features of special architectural or historic interest which it possesses.

7.3. The application building is considered to be architecturally interesting by virtue of its horizontal emphasis, the Crittall windows, the bricks and render and its overall design. The building provides a typical example of 1950's architecture and it is considered that it fits in well with the "back street" character of this part of the Bloomsbury Conservation Area. The modest character and appearance of the host building also gives the building a subservience when viewed against the backdrop of grander buildings in the local area, such as the above-mentioned listed buildings. The roof of the older part of the building (the 1900's warehouse building at the rear of the site) is visible in long-range views of the building as the roof extends above the roof of the 1950's element; however, it is not possible to really discern what type of building lies at the rear of the site in most views of the application site.

7.4. The Bloomsbury Conservation Area Appraisal and Management Strategy (BCAAMS) notes

that extensions and alterations to existing buildings within the conservation area can have a detrimental impact, for example, through the inappropriate design of extensions; the use of inappropriate materials or detailing; inappropriate roof level extensions, particularly where these interrupt the consistency of the prevailing scale and character of a block or are overly prominent in the street; or extensions of excessive scale, massing or height. The BCAAMS requires that development proposals must preserve or enhance the character and appearance of the Bloomsbury Conservation Area.

- 7.5. As noted at the time of the previous application, the proposal to extend the building upwards is considered to be acceptable in principle; however, it is important to get the design right, so that the extension complements the existing building, and unifies the whole building, but at the same time allows the historical development of the building to be understood (i.e. the difference between the old and the new). It is recognised that extending the 1950's part of the building upwards would block views of the 1900's warehouse building at the rear, but this is considered to be acceptable on the basis that this part of the building is already relatively highly screened from public view and it has not previously been identified as making a positive contribution to the character and appearance of the Bloomsbury Conservation Area.
- 7.6. The existing building has a very defined 'top' (the overhang above the brickwork) and to a certain extent it already appears complete in design terms. Despite the proposed changes to the proposed design, it is still not considered that the proposed extension would relate well to the existing building.
- 7.7. Although the existing overhang on the building would be retained (thereby indicating the top of the 'old' part of the building), it is still not considered that the proposed extension would sit comfortably above. Instead, it is considered that the extension would appear as an incongruous addition to the host building.
- 7.8. From the visualisations provided, it appears that the proposed extension would visually dominate the host building and the increased height would detract from the horizontal emphasis of the building, which is considered to be important to its overall character and appearance.
- 7.9. With regards to the materials, it is recognised that the glazed panels are more light-weight in appearance than the buff brick proposed at the time of the previous application; however, the previous Officer's Report specifically noted the following: *"The use of buff brick is preferable to the original proposal to use large amounts of glazing at the top of the building, and the fact the windows would now relate to the windows on the lower floors is welcomed; however, the overall detailed design of the extension is not considered to be of sufficiently high quality"* (paragraph 6.11).
- 7.10. The proposed glazed panels would align with the window openings below; however, it is not considered that this would be readily apparent in views of the resultant building and it is considered that the large amounts of glazing at the top of the building would detract significantly from the established character and appearance of the host building. The existing building features a mixture of different facing materials (brickwork, render, glass block banding), and it has a coherent overall design. It is not considered that the proposed extension above the existing building would relate well to the existing building and it is considered that the resultant building would lack the same coherence that it currently exhibits. This would be to the detriment of the character and appearance of the host building, the street scene along Flaxman Terrace and also the wider conservation area.
- 7.11. The resultant building, by virtue of the large amounts of glazing, would also have greater visual presence in the street, which is not in keeping with the "back street" character of this

particular street and this part of the conservation area. Contrary to the BCAAMS guidance, it is considered that the proposed extension would result in the host building being overly prominent in the street scene and the proposal would interrupt the consistency of the prevailing scale and character of the street, to the detriment of the character and appearance of the Bloomsbury Conservation Area.

7.12. The increased visual presence of the host building would also adversely alter the existing relationship between the application building and nearby listed buildings, insofar as the resultant building would no longer appear as subservient in scale, character and appearance as it currently does. Thus it would not preserve the setting of nearby listed buildings, to their detriment.

7.13. To conclude, the proposed roof extension, by virtue of its siting, size, detailed design and appearance, would cause harm to the character and appearance of the host building, the street scene along Flaxman Terrace and the Bloomsbury Conservation Area, as well as the setting of nearby listed buildings (17 Duke's Road and The Lodge on Flaxman Terrace). The proposal is therefore contrary to Policies CS14, DP24 and DP25 and the application is recommended for refusal on this basis.

8. impact on the amenities of the occupiers of neighbouring properties

8.1. Policy DP26 notes that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors to consider include: overlooking; outlook; sunlight, daylight and artificial light levels; noise and vibration levels; odour, fumes and dust; microclimate; and the inclusion of appropriate attenuation measures.

8.2. At the time of the previous application, it was considered overall that the impact on nearby and neighbouring properties would be acceptable. It was noted that, whilst the proposed extension might be visible from residential properties in Grafton Mansions, it would be viewed at an angle and the part of the host building closest to those properties would remain unaltered. It was not considered that the proposed extension would cause undue harm to the outlook or sunlight/daylight levels at these properties. Furthermore, there would have been no windows facing these properties, and therefore overlooking would not pose a problem either. The revised proposal does not change this assessment.

8.3. It was previously noted that the proposed extension would be visible from 22 Dukes Road, the adjacent property to the south-west. In particular, it would be visible from the windows on the eastern elevation of this building, which face towards Flaxman Terrace. Nevertheless, it was noted that this building is an office building and any loss of outlook from the windows on the eastern elevation was considered to be acceptable because these windows would not lose their pleasant, long-range outlook onto Flaxman Terrace; they would only lose some outlook in a specific direction towards the sky. Furthermore, it was not considered that this building would suffer undue loss of light because the host building is located towards the north-east. The revised proposal does not change this assessment, except for the fact the revised proposal shows glazing on the side-elevation, facing towards No. 22 Dukes Road. If the application was otherwise considered to be acceptable, a planning condition could require the side-facing windows to be fitted with obscure-glazing, to prevent any direct overlooking into No. 22 Dukes Road.

8.4. At the time of the previous application, a Daylight and Sunlight Report was submitted; however, no such report has been provided with this current application. Nevertheless, at the time of the previous application, the impact of the proposal on neighbouring properties in terms of daylight and sunlight was considered to be acceptable on the basis that the proposed

extension would sit atop the front part of the host building (i.e. the 1950's modern element) rather than the rear part which would limit the impact on neighbouring buildings.

- 8.5. In relation to No. 22 Duke's Road it was noted that because the application building is located to the north-east of this building, loss of sunlight would not be an issue. With regards to daylight, No. 22 is an irregular shape, with 3 elevations facing outwards onto the street, and 1 towards the application building, with a gap of about 4 metres between the two. The internal layout of No. 22 is unknown; however, whilst there may be some loss of daylight to the rear-facing windows on the property (in particular the lower ones), this is unlikely to be significant. The building is fortunate in that the area to the south-east is open in character, which is likely to further reduce any loss of daylight that might be felt within the building as a result of the proposed works. Overall, the impact on this building was judged to be acceptable. The revised proposal does not change this assessment.
- 8.6. At the time of the previous application, concerns were raised about additional comings and goings to the building as a result of the increased floor space; however, despite Flaxman Terrace itself being a relatively quiet street, it is located in Central London, where the Council considers it appropriate to focus further development of this kind. Overall, the impact of the increased floor space in terms of general activity at the application site was not considered to be so sufficient as to warrant a refusal of the application on this basis. The revised proposal does not change this assessment.
- 8.7. At the time of the previous application, concerns were also raised about the proposed bin store and the impact on properties to the rear. It was noted that, if the application was otherwise considered to be acceptable, this issue could be satisfactorily overcome through the use of an appropriate planning condition. This remains the case.
- 8.8. Policy DP28 notes that the Council will seek to minimise the impact on local amenity from the demolition and construction phases of development. Concerns have been raised by local residents and businesses about the impact of the construction phase. Given the nature of the proposed works and the application site's location, if the application was otherwise considered to be acceptable, the Council would look to secure the submission of a Construction Management Plan (CMP) through the legal agreement. The applicant has indicated a willingness to secure a CMP through a legal agreement; however, they have failed to enter into a section 106 legal agreement to secure this, and the application is therefore recommended for refusal on this basis.
- 8.9. Overall, the proposal is considered to be acceptable in this respect.

9. Transport considerations

- 9.1. The application site has a Public Transport Accessibility Level (PTAL) of 6b (the highest rating), and is within a Controlled Parking Zone. Policy DP18 expects development, including non-residential development, to be car free in the Central London Area and the proposal complies in this respect.
- 9.2. The London Plan 2016 requires 1 long-stay cycling space per 90 square metres of floor space and 1 short-stay cycling space per 500 square metres of floor space, which equates to a requirement to provide 4 spaces (to serve the additional 233sqm of floor space). The proposal would provide 20 cycle parking spaces to serve the whole building (1621sqm) which falls 2 spaces short of the London Plan target (the requirement would be 22 spaces). Nevertheless, as part of this application, the Council can only require the 4 spaces to serve the additional floor space which is being created, and therefore the provision of 20 spaces is welcomed.

- 9.3. All cycle parking facilities should be fully enclosed, secure and covered, which is not clear from the submitted information. Nevertheless, if the application was otherwise considered to be acceptable, a suitable planning condition could require full details of cycle parking to be submitted to and agreed in writing by the Council prior to the commencement of development.
- 9.4. Policy DP20 seeks to minimise the impact of the movement of goods and materials by road. Given the constraints of the application site and the nature of the proposed works, if the application was otherwise considered to be acceptable, the Council would look to secure the submission of a Construction Management Plan (CMP) through the legal agreement. As noted above, the applicant has indicated a willingness to secure a CMP through a legal agreement; however, they have failed to enter into a section 106 legal agreement to secure this, and the application is therefore recommended for refusal on this basis.

10. Sustainability considerations

- 10.1. Policy CS13 notes that the Council will require all development to take measures to minimise the effects of, and adapt to, climate change and the policy encourages all development to meet the highest feasible environmental standards that are financially viable during construction and occupation. Policy DP22 requires development to incorporate sustainable design and construction measures and it requires the incorporation of green or brown roofs, wherever suitable.
- 10.2. The Planning Statement which accompanies the application notes that the building will be highly sustainable. It notes that the development will use responsibly sourced and low environmental impact materials to ensure that the building is fully sustainable throughout the construction and operation of the building.
- 10.3. It is not considered that the applicant has satisfactorily demonstrated that the proposal would take measures to minimise the effects of, and adapt to, climate change through sustainable design and construction measures, in compliance with Policies CS13 and DP22. Furthermore, the proposal does not include a green or brown roof and no justification is provided for the lack of such features. The application is therefore recommended for refusal on this basis.

11. Planning obligations and CIL

- 11.1. The proposal would be liable for the Mayor of London and Camden Community Infrastructure Levy (CIL) as the floor space exceeds 100sqm. The Mayoral CIL rate in Camden is £50/sqm. The Camden CIL rate for office development in Zone A is £25/sqm. Based on the information provided (net additional gross internal floor space of 233sqm), the CIL payments are likely to be £11,650 (£50 x 233) and £5825 (£25 x 233). 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.

Recommendation: Refuse planning permission.