
Bedford House 21a John Street

Town Planning Statement

May 2017

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Appendix 1: Letting and Space Availability Note prepared by Metrus Limited

1. Introduction

- 1.1. This Town Planning Statement has been prepared by Savills on behalf of Benesto Charity Limited (the Applicant), and is submitted in support of an application for full planning permission for extensions and alterations to Bedford House, 21a John Street in the London Borough of Camden (LBC).

Description of Development

- 1.2. This application seeks full planning permission for:

“Extension and alterations to Bedford House, comprising: single storey roof extension fronting John Street; single storey roof extension to the rear fronting John’s Mews; extensions to central core; provision of new plant at roof level, alterations to the main entrance on John Street; and replacement of windows.”

- 1.3. Bedford House is currently in Class B1 (office) use. The building is occupied by a number of businesses and its internal configuration is compromised by the constraints of the existing building layout. This application proposes alterations and extensions to the existing building to improve the quality of, and optimise, the office floorspace. The extensions will enable a re-arrangement of the internal circulation arrangements thus enabling the provision of an open-plan floorplan more suited to modern office requirements.

The Applicant

- 1.4. The Applicant, Benesco Charity Limited, are a registered charity (charity number: 269181) and are part of the Charles Wolfson Charitable Trust (charity no. 1156077) which is an independent charity that awards grants to support and promote excellence in the fields of science, health, education and the arts & humanities. The charity generates income from property and other investments in order to make grants available to various charities including but not exclusively in the fields of medicine, education and welfare.
- 1.5. The amendments to Bedford House are being sought to improve the quality and usability of the existing office space so to maintain the attractiveness of the property.

Supporting Information

- 1.6. This Town Planning Statement should be read in conjunction with the accompanying plans and drawings submitted as part of the application, as well as the following documents:
- Design and Access Statement prepared by CG Architects;
 - Heritage Assessment prepared by WYG;
 - Transport Statement by WYG;
 - Framework Travel Plan prepared by WYG;
 - Daylight and Sunlight Study prepared by Right of Light Consulting;
 - Noise and Vibrations Management Plan prepared by KP Acoustics;
 - Noise Impact Assessment prepared by KP Acoustics;
 - Preliminary Planning Compliance Report; and

- Energy & Sustainability Statement prepared by Energy Rating Services.

Structure of the Statement

1.7. The structure of this Town Planning Statement is set out as follows:

- **Section 2** (Site and Surroundings) provides a brief description of the site and surroundings;
- **Section 3** (The Proposed Development) details the development proposals;
- **Section 4** (Planning Policy Framework) sets out the relevant planning policy framework;
- **Section 5** (Planning Assessment) assesses the development proposals against the planning policy framework; and
- **Section 6** (Conclusions) draws our conclusions in respect of the proposals.

2. Site and Surroundings

The Site

- 2.1. Bedford House is a large brick building that dates from the twentieth Century. The building has been used as an office building since it was built in the mid 1950s. The building is subdivided into a number of individual spaces that are currently occupied for a range of businesses.
- 2.2. The property is located on John Street whilst also backing onto John's Mews. The site is a short distance from the junction of Roger Street and Doughty Street / Mews.
- 2.3. The property can be split into three broad parts, a five storey (plus lower ground level) frontage block along John Street, a two storey (plus lower ground level) rear block along John's Mews and the seven storey central block within the centre of the site which links the front and rear block, resulting in a 'H-shape' layout.



Aerial view of the application site.

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The frontage of Bedford House from John Street.

- 2.4. The 'H shape' building is sited between surrounding buildings and roads on either side. The building layout creates two small courtyard within the centre of the site.



Aerial view of Bedford House.

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- 2.5. The courtyard to the south of the site is accessible via a vehicular access from John's Mews shown in the picture below. The courtyard to the north is only accessible via pedestrian access from Bedford House. These courtyards are currently used for ancillary storage and servicing.



Vehicular Access to the Site from John's Mews

- 2.6. In terms of formal planning designations for the site, the following are noted within relevant planning documents:
- Designated view 6A.1 Blackheath Point to St Paul's Cathedral – Right Lateral Assessment Area; and,
 - Central London Area (Clear Zone Region) (CLA).
- 2.7. Additionally, the site is located within the Bloomsbury Conservation Area. The Conservation Area Strategy (April 2011) for this area describes its key characteristics as follows:
- Wide thoroughfares characterised by larger properties;
 - No planned open space in the area;
 - The historic built form comprises townhouses built in long terraces with rear mews;
 - Although once primarily residential, the area now has a mixture of uses. The main and secondary thoroughfares including John Street are dominated by office uses but retain some residential uses;
 - Buildings on John Street are generally of four storeys with basements;
 - Bedford House is recognised as being significantly larger than its neighbours rising to eight storeys; and,
 - Bedford House is not identified as a detractor or an opportunity site.
- 2.8. None of the buildings on the site are statutorily or locally listed, however, as detailed below many buildings surrounding the site are.

- 2.9. The site has a Public Transport Accessibility Level (PTAL) rating of part 6a, part 6b, the highest two scores possible, indicating an excellent level of public transport accessibility. It is located approximately 600 metres west of Russell Square Underground Station and approximately 600m north west of Chancery Lane Underground Station. There are three bus stops within approximately 200m of the site along Theobolds and Grays Inn Road providing numerous services to a range of locations across London.
- 2.10. There are no trees located within the boundary of the application site although there are some street trees along John Street in front of the site.

Surrounding Area

- 2.11. The surrounding area consists of a mix of uses although John Street is predominately dominated by office uses with some residential uses intermittently. In addition there is primary school located due west of the site on the opposite side of John's Mews and a public house located to the north of the site on Doughty Mews. 21 John Street adjacent to the site to the north has recently been converted from an office to residential use.
- 2.12. The surrounding area is varied in terms of architectural style, height and massing.
- 2.13. Generally the properties along John Street are four storeys in height with basements; however, 21 John Street adjacent to the site rises to 11 storeys. Along John's Mews to the rear of the site the property to the north of the site raises to four storeys whilst the property to the south rises to three storeys. The school to the west is predominately one storey in height.
- 2.14. As well as being situated within the Bloomsbury Conservation Area there are a number of Grade II listed buildings in the vicinity. These include:
- 21 John Street to the north;
 - The Duke of York public house to the north;
 - 1 – 4 Mytre Court to the north;
 - The terrace at 22 – 28 John Street, together with associated railings, to the south; and
 - The terrace on the opposite site of John Street, including nos. 10 – 20 is also listed.
- 2.15. Further analysis of the surrounding area and the application site's relationship with adjoining buildings is set out within the Design & Access Statement and Heritage Assessment that form part of this submission.

Planning History

- 2.16. A review of the Council's online planning history records has identified the following planning history in relation to the site. None of the applications identified are considered relevant to the proposals.

Bedford House, 21a John Street

Reference	Description	Decision	Decision Date
2011/4548/P	Installation of fuel tank at ground floor level in connection with telecommunications site.	Granted	11/11/2011
PSX0204803	Erection of glass canopy to front entrance.	Granted	06/08/2002
PSX0204056	Refurbishment of entrance and provision of a pedestrian access ramp to provide disabled access to the building	Granted	08/04/2002
PSX0204057	Refurbishment of entrance and pedestrian access to provide new disabled access with glazed lobby.	Withdrawn	26/03/2002
PS9804906	The installation of a 1.2m satellite dish, as shown by drawing number PM/ABAD/1041a.	Granted	22/10/1998
PS9705335	Installation of roof mounted air conditioning units and minor modification to elevations.	Withdrawn	01/07/1998
AS9705349	Display of internally illuminated fascia sign. (as shown on drawing no. sheet 1 of 1).	Granted	13/02/1998
PS9704273R1	Replacement of existing windows, as shown in drawing no's PH/ABAD/1037A, 1038A, 1039A, and specification information on Senlac W20 purpose made steel windows.	Granted	26/09/1997
PS9704273	Replacement of existing windows.	Withdrawn	10/09/1997
9100979	The erection of telecommunications equipment security store building in rear ground floor open yard area and the formation of a new doorway in main building and new raised walkway to provide access as shown in drawing numbers BED/BS/100/1 and BED/BS/100/2 and Elliott Work- space Limited's store specification.	Granted	11/02/1992

Reference	Description	Decision	Decision Date
9080036	The display of an internally illuminated box sign measuring 2.44m by 0.9m over the front entrance as shown on block drawing received on 12th June 1990.	Refused	01/08/1990
8703754	Change of use of part of basement from offices to use for telecommunications purposes as shown on drawing number PM/ABAD/1008.	Granted	23/03/1988
8602218	Installation of six air-conditioning units a generator and associated fuel tank at the rear as shown on drawing number PM/ABAD/1018A.	Granted	12/02/1987
8600268	Installation of 1.8m dish aerial on roof.	Granted	19/03/1986
8401434	Installation of air conditioning condenser unit (at ground floor level).	Granted	24/10/1984
8401179	Installation of a ventilation system for existing kitchen.	Granted	22/08/1984
CA/1215/C	A non-illuminated single sided built up perspex fascia sign.	Granted	05/11/1970
M15/22/12/26/05/55	The erection of an office building on the site of 21a John Street.	Granted	July 1955

- 2.17. In addition there are a number of planning applications at neighbouring dwelling that are of relevance to Bedford House and the proposals. These are summarised below.

21 John Street

- 2.18. Two planning applications (application references: 2016/4657 and 2016/4325/P) for a roof extension at 8th floor level to provide additional living space for the existing residential flat at 7th floor level, submitted in August 2016, in relation to the neighbouring site at 21 John Street. Both applications were withdrawn, as was a linked application for listed building consent (2016/4656/L).

13 / 15 Johns Mews

- 2.19. At 13 / 15 John Mews, which is immediately south of the site, an application (reference: 2014/3330/P) was registered in May 2014 to change the use from garage/ workshop/ offices (class B1) to residential use (class C3) to provide two dwelling houses including excavation works to create a new basement floor level, creation of 2 new courtyards, mansard roof extensions and alterations to the front and rear elevations. This application is awaiting determination.
- 2.20. Planning permission (ref: 2014 2013/4967/P) was granted in March 2014 2013/4967/P for the “Change of use from garage/workshop/offices (Class B1) to residential use (Class C3) to provide 2 dwellinghouses, including mansard roof extensions and elevational alterations to front and rear.”.

19 John Street

- 2.21. Planning Permission (ref: 2016/2867/P) was granted in December 2016 for the conversion of an existing office to provide a residential use.

Pre-Application Discussions

- 2.22. Pre-application discussions have been undertaken over a period of five months with LBC officers. This included a site visit and meeting with Officers in August and September 2016.
- 2.23. The emerging pre-application proposals comprised of:
- A set back two storey roof extension on the building fronting John Street, with amenity terraces for the office use. A rooftop plant enclosure would be provided on the new roof level;
 - An eight storey infill extension in the service courtyard;
 - A single storey roof extension on the building fronting John’s Mews; and
 - Improvements to the existing entrance on John Street, and new windows.
- 2.24. The Council provided their written pre-application advice in January 2017. The proposals have evolved significantly since conception, to take account of specialist heritage advice, the Council’s comments and other technical assessment work undertaken. The evolution of the scheme design is shown in pages 13 – 18 of the submitted Design and Access Statement.
- 2.25. The pre-application process has allowed for the continued evolution of the detail of the proposed development to ensure that the proposal responds and respects the distinctive local character and local heritage assets.

3. The Proposed Development

- 3.1. The proposals can be broken down into a number of elements as described briefly below. Full details are provided on the Application Drawings and within the Design and Access Statement submitted with the planning application.
- Single storey roof extension to the main block fronting John Street, and rear block on John's Mews
- 3.2. Single storey set back roof extensions are proposed to the front and rear blocks. These are provided to create additional floor space to enable the wider works to optimise the potential of the existing office floorspace, thereby optimising the potential of the site. The new floor space will be finished to a high standard. The set back on the front roof extension enables the creation of an amenity terrace for the office occupiers.
- Extensions to the seven storey central block to create a new circulation core
- 3.3. It is proposed to reconfigure the existing core into the extension provided to the seven storey central core. The new reconfigured core will provide access to all levels and will significantly improve internal circulation, allowing for the optimisation of the existing floorspace by facilitating the creation of a flexible open plan office floor plate.
- Installation of a metal fire escape staircase to the north lightwell
- 3.4. A new metal stair enclosed with a curtain walling system is to be located within the northern light well to provide a means of escape for occupiers in an emergency.
- Alterations to the main entrance located on John Street
- 3.5. The main entrance to the building on John Street is to be widened. This will lead into an enlarged reception and waiting area. One of the existing windows will be removed to facilitate these works.
- Replacement of windows with new aluminium frame windows
- 3.6. New windows are proposed to replace existing on all facades. These will be of a high standard and result in improved energy efficiency and sound insulation.
- Provision of new plant within an enclosure at roof level
- 3.7. Existing roof plant will be replaced and relocated. This will be rationalised into a new centrally located plant enclosure above the new roof.
- 3.8. Overall, the proposed works provide an increase of 968.9 sqm (GIA) of additional B1 use floorspace, although approximately 460.7 sqm (GIA) is formed of the new circulation core and ancillary spaces. Only 508.2 sqm will provide functional office floorspace that can be used for desk or meeting space. The total GIA of the building will increase from 3,627 sqm to 4,596 sqm (GIA).

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- 3.9. Refuse facilities will be provided in the southern courtyard providing easy access to the existing access to the service courtyard.
- 3.10. Cycle parking providing spaces for 70 cycles is to be provided at lower ground level.
- 3.11. The overall intent of the proposals is to; improve the quality and standard of the property to bring it up to a modern standard, the increases in floor areas also provide existing tenants with the opportunity to expand.

4. Planning Policy Framework

4.1. The 2004 Planning & Compulsory Purchase Act requires that determination of any planning application must be in accordance with the development plan unless material considerations indicate otherwise.

4.2. In this case the development plan comprises:

- London Plan (March 2016);
- The London Borough of Camden Core Strategy (November 2010); and
- The London Borough of Camden Development Policies (November 2010).

4.3. Material considerations include:

- National Planning Policy Framework (NPPF), adopted March 2012;
- Planning Practice Guidance (PPG), first published March 2014; and
- Various Camden Planning Guidance (CPG) and Supplementary Planning Documents (SPDs) which offer more detailed advice with regard to specific aspects of development in the Borough.

4.4. The Council are in the process of preparing a new Local Plan. In June 2016, the Local Plan Submission Draft was submitted to the Secretary of State for Communities and Local Government for independent examination. Public hearings were held in October 2016. Following public examination, subject to modifications to the Local Plan Submission Draft being made, the Planning Inspector's report has found the Plan 'sound'. We understand that as a result the Council is giving weight is being given to the emerging Local Plan.

NATIONAL

National Planning Policy Framework

4.5. The development that is the subject of this application has been considered in light of the National Planning Policy Framework (NPPF), which provides a direction for planning on a national scale and the expectation that all local planning documents will be in general conformity with the NPPF.

4.6. One of the most important aspects of the NPPF is the 'golden thread' of a presumption in favour of sustainable development that runs through all of the policies contained within.

4.7. In particular, paragraph 7 of the NPPF indicates that there are three dimensions to sustainable development: economic, social and environmental, and that these dimensions give rise to the need for the planning system to perform a number of roles:

- *'an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*

- **a social role** – *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; and*
- **an environmental role** – *contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.’*

4.8. Having regard also to paragraph 14 of the NPPF, the second half of this paragraph refers specifically to how the presumption in favour of sustainable development should be seen as a ‘golden thread’ running through decision-taking. Specifically it refers to:

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

4.9. With regard to building and maintaining a competitive economy Paragraph 19 states that ‘the Government is committed to ensuring that the planning system does everything to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system’.

4.10. Paragraph 128 outlines that LPA should “*require an applicant to describe the significance of any heritage assets affected including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.*”

Planning Policy Guidance

- 4.11. On the 6th March 2014 the Department for Communities and Local Government launched the Planning Practice Guidance (PPG). The PPG replaces the majority of previous planning practice guidance, consolidating it and providing it as an easily accessible online resource. The PPG sits alongside the NPPF.
- 4.12. The PPG encourages high quality design and states that, “*local planning authorities should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area.*”
- 4.13. Furthermore, the PPG recognises the importance of locally distinctive patterns of development, local man made and natural heritage and culture, while not preventing or discouraging appropriate innovation.
- 4.14. The PPG also provides guidance on relevant issues such as: sustainability and renewable and low carbon energy; design; housing need and quality; the natural environment and recreation; air quality; noise; flood risk; climate change; health and wellbeing; transport and travel plans; waste; viability; planning conditions; planning obligations and the Community Infrastructure Levy (CIL).

REGIONAL

London Plan (2016)

- 4.15. The London Plan is the overall strategic plan for London, which sets out an integrated economic environmental, transport and social framework for the development of London over the next 20 – 25 years. Policies that are relevant to the development proposals are provided below.
- 4.16. Policy 4.1 (Developing London’s Economy) outlines how the Mayor will promote and enable “*the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises*”.
- 4.17. Policy 4.2 (Offices) notes how the Mayor will and boroughs and other stakeholders should:
- “support the management and mixed use development and redevelopment of office provision to improve London’s competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises;*
- encourage renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility; and*
- Seek increases in the current stock where there is authoritative strategy and local evidence of sustained demand for office-based activities”.*
- 4.18. Policy 4.3 (Mixed Use Development and Offices) states how within the Central Activities Zone, increases in office floorspace, or those above a justified local threshold should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies within the London Plan.

- 4.19. Policy 5.4 (Retrofitting) notes how the environmental impact of existing urban areas should be reduced through policies and programmes that bring existing buildings up to the Mayor's standards on sustainable design and construction. In particular, programmes are encouraged to reduce carbon dioxide emissions, improve the efficiency of resources use (i.e. water) and minimise the generation of pollution and waste from the existing building stock.
- 4.20. Policy 6.9 (Cycling) outlines how as part of encouraging cycling within London developments should provide parking facilities in line with the minimum standards set out in Table 6.3 of the London Plan and provide on-site changing facilities and showers for cyclists.
- 4.21. In Table 6.3 the minimum cycle standards for business offices in central London is for 1 space per 90sqm (long stay) and 1 space per 500sqm for the first 5,000sqm and thereafter 1 space per 5000sqm (short stay).
- 4.22. Policy 6.13 (Parking) notes how in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people).
- 4.23. Policy 7.4 (Local Character) states that "*development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding building. It should improve an area's visual or physical connection with natural features.*"
- 4.24. Policy 7.6 (Architecture) outlines how buildings and structures should:
- "be of the highest architectural quality;*
- be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;*
- comprise details and materials that complement, not necessarily replicate, the local architectural character; and*
- not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings."*
- 4.25. Policy 7.8 (Heritage Assets and Archaeology) states that "*development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail*".

LOCAL

Camden Core Strategy (2010)

- 4.26. Camden's Core Strategy set out the key elements of the Council's planning vision and strategy for the borough. The key policies relevant to the proposals are provided below.

- 4.27. Policy CS1 (Distribution of Growth) sets out the overall approach to growth and development within the borough and states how development in highly accessible locations, in particular Central London, will be promoted.
- 4.28. In order to make best use of land in the borough the Council will be:
- “seeking development that makes full use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;*
- expecting development that will significantly increase the demand of travel to be located in growth areas and other highly accessible parts of the borough;*
- expecting high density development in Central London, town centres and other locations well served by public transport; and*
- expecting the provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the borough, including an element of housing where possible.”*
- 4.29. Policy CS3 (Other Highly Accessible Areas) states how the Council will promote appropriate development in highly accessible areas defined on the proposals map as Central London. This area is *“considered to be suitable 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. The Council will ensure that development in these locations is a suitable scale and character for the area in which it is situated”*.
- 4.30. Policy CS5 (Managing the Impact of Growth and Development) outlines how the Council will manage the impact of growth and development in Camden by ensuring that development meets the full range of objectives of the Core Strategy and other Local Development Framework documents. As part of this the Council will give particular consideration to:
- 4.31. Providing sustainable buildings and spaces of the highest quality; and
- 4.32. Protecting and enhancing our environment and heritage and the amenity and quality of life of local communities.
- 4.33. The Council will protect the amenity of Camden’s residents and those working in and visiting the borough by:
- “making sure that the impact of developments on their occupiers and neighbours is fully considered;*
- seeking to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities; and requiring mitigation measures where necessary.”*
- 4.34. Policy CS8 (Protecting a Successful and Include Camden Economy) states how the Council will:

“Secure a strong economy in Camden and will promote the provision of office floorspace in Central London to meet the forecast demand of 615,000sqm to 2026;

Provide adequate support for Camden’s industries will also be provided by safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers; and

Expect a mix of employment facilities and types, including the provision of facilities for small and medium sized enterprises, such as managed, affordable workspace.”

- 4.35. Policy CS11 (Promoting Sustainable and Efficient Travel) outlines how in order to support Camden’s growth and to promote walking, cycling and public transport, the Council will continue to improve facilities for cyclists including increasing the availability of cycle parking, helping to deliver the London Cycle Hire Scheme and enhancing cycle links.

- 4.36. Policy CS13 (Tackling Climate Change Through Promoting Higher Environmental Standards) outlines how the Council; will require all development to take measure to minimise the effects of, and adopted to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation by:

“Ensuring patterns of land use that minimise the need to travel by car and help support local energy networks; and

Promoting the efficient use of land and buildings; and

Ensuring buildings and spaces are designed to cope with, and minimise the effects of climate change.”

- 4.37. Policy CS14 (Protecting High Quality Places and Conserving our Heritage) the Council will ensure that Camden’s places and buildings are attractive, safe and easy to use by:

“Requiring development of the highest standard of design that respects local context and character;

Preserving and enhancing Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;

Promoting high quality landscaping and works to streets and public spaces;

Seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible; and

Protecting important views of St Paul’s Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views.”

- 4.38. CS18 (Dealing with our Waste and Encouraging Recycling) outlines how developments will be encouraged to include facilities for the storage and collection of waste and recycling.

Camden Development Policies (2010 – 2025)

- 4.39. The Camden Development Policies contribute towards delivering the Core Strategy by setting out detailed planning policies that the Council will use when determining applications for planning permission in the Borough to achieve the vision and objectives of the Core Strategy.
- 4.40. Policy DP1 (Mixed Use Development) states how the Council will require a mix of uses in development where appropriate in all parts of the borough, including a contribution towards the supply of housing. In the Central London Area where more than 200sqm (gross) additional floorspace is provided up to 50% of all additional floorspace is to be housing.

“The Council will require any secondary uses to be provided on site, particularly where 1,000sqm (gross) of additional floorspace or more is proposed. Where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally a payment-in-lieu.”

In considering whether a mix of uses should be sought, whether it can practically be achieved on the site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing and other secondary uses, the Council will take into account:

- *The character of the development, the site and the area;*
- *Site size, the extent of the additional floorspace, and constraints on including a mix of uses;*
- *The need for an active street frontage and natural surveillance;*
- *The economics and financial viability of the development including any particular costs associated with it;*
- *Whether the sole or primary use proposed is housing;*
- *Whether secondary uses would be incompatible with the character of the primary use;*
- *Whether an extension to the gross floorspace is needed for an existing user;*
- *Whether the development is publicly funded; and*
- *Any other planning objectives considered to be a priority for the site.”*

- 4.41. Policy DP3 (Contributions to the Supply of Affordable Housing) outlines that:

“The Council will expect all residential developments with a capacity for 10 or more additional dwellings to make a contribution to the supply of affordable housing.”

The Council will expect the affordable housing contribution to be made on site, but where it cannot practically be achieved on site, the Council may accept off-site affordable housing, or exceptionally a payment-in-lieu.”

- 4.42. Policy DP5 (Homes of Different Sizes) states that the Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes. The Council will:

“Seek to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table, including conversion of existing residential and non-residential floorspace; expect a mix of large and small homes in all residential developments.”

- 4.43. Policy DP6 (Lifetime Homes and Wheelchair Homes) states that *“all housing development should meet lifetime homes standards. 10% of homes developed should either meet wheelchair housing standards, or be easily adapted to meet them”*.

- 4.44. Policy DP13 (Employment Premises and Sites) notes how the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business use unless:

“It can be demonstrated to the Council’s satisfaction that a site or building is no longer suitable for its existing business use; and

There is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.”

Where premises or sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed use schemes provided that:

The level of employment floorspace is maintained or increased;

They include other priority uses, such as housing and affordable housing;

Premises suitable for new, small or medium enterprises are provided;

Floorspace suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses; and

The proposed non-employment uses will not prejudice continued industrial use in the surrounding area.”

- 4.45. Policy DP16 (The Transport Implications of Development) outlines how the Council will seek to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links.

- 4.46. Policy DP17 (Walking, Cycling and Public Transport) outlines the Council’s commitment to promoting walking, cycling and public transport use. Developments should make suitable provision for pedestrians, cyclists and public transport and, where appropriate, will also be required to provide for interchanging between different modes of transport. In addition the Council will also resist development that would be dependent on travel by private motor vehicles.

- 4.47. Policy DP18 (Parking Standards and limiting the availability of car parking) notes how the Council will seek to ensure that developments provide the minimum necessary car parking provision. The Council will expect development to be car free in the Central London Area.

- 4.48. Development will also be expected to meet the Council's minimum standards for cycle parking which are as follows:

“Staff – from threshold of 500 sqm, 1 space per 250 sqm of part thereof.

Visitors – from threshold of 500 sqm, minimum of 2 if any visitors are expected, plus any additional spaces needed to bring the total number up to 10% of the visitors likely to be present at any time”

- 4.49. Policy DP22 (Promoting Sustainable Design and Construction) states how the Council will require development to incorporate sustainable design and construction measures. Schemes must:

“Demonstrate how sustainable development principles...have been incorporated into the design and proposed implementation; and

Incorporate green or brown roofs and green walls wherever suitable”

The Council will promote and measure sustainable design and construction by:

“Expecting non-domestic development of 500sqm of floorspace or above to achieve “very good” in BREEAM assessments and “excellent” from 2016 and encouraging zero carbon from 2019.”

- 4.50. The Council will require development to be resilient to climate change by ensuring schemes include appropriate climate change adoption measures, such as:

“Summer shading and planting;

Limiting run-off;

Reducing water consumption;

Reducing air pollution; and

Not locating vulnerable uses in basements in flood-prone areas.”

- 4.51. Policy DP23 (Water) outlines how the Council will require developments to reduce their water consumption, the pressure on the combined sewer network and the risk of flooding by:

“Incorporating water efficient features and equipment and capturing, retaining and re-using surface water and grey water on-site;

Limiting the amount and rate of run-off and waste water entering the combined storm water and sewer network through the methods outlined in part a) and other sustainable urban drainage methods to reduce the risk of flooding;

Reducing the pressure placed on the combined storm water and sewer network from foul water and surface water run-off and ensuring developments in the areas identified by the North London Strategic Flood Risk Assessment and shown on Map 2 as being at risk of surface water flooding are designed to cope with the potential flooding;

Ensuring that developments are assessed for upstream and downstream groundwater flood risks in areas where historic underground streams are known to have been present; and

Encouraging the provision of attractive and efficient water features.”

- 4.52. Policy DP24 (Securing High Quality Design) outlines how the Council will require all developments including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

“Character, setting, context and the form and scale of neighbouring buildings;

The character and proportions of the existing building, where alterations and extensions are proposed;

The quality of materials to be used;

The provision of visually interesting frontages at street level;

The appropriate location for building services equipment;

Existing natural features, such as topography and trees;

The provision of appropriate hard and soft landscaping including boundary treatments;

The provision of appropriate amenity space; and

Accessibility.”

- 4.53. With regard to Conservation Areas Policy DP25 (Conserving Camden’s Heritage) outlines that in order to maintain the character of Camden’s conservation areas, the Council will:

“Take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;

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;

Not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and

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

4.54. In order to preserve or enhance the borough's listed buildings, the Council will:

"...not permit development that it considers would cause harm to the setting of a listed building."

4.55. Policy DP26 (Managing the impact of Development on Occupiers and Neighbours) states that the Council will protect the quality of life occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors that the Council will consider include:

"Visual privacy and overlooking;

Overshadowing and outlook;

Sunlight, daylight and artificial light levels;

Noise and vibration levels;

Odour, fumes and dust;

Microclimate;

The inclusion of appropriate attenuation measures."

4.56. The Council will also require developments to provide:

"An acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;

Facilities for the storage, recycling and disposal of waste;

Facilities for bicycle storage; and

Outdoor space for private or communal amenity space, wherever practical."

4.57. Policy DP28 (Noise and Vibration) outlines how the Council will seek to ensure that noise and vibration is controlled and managed and will not grant planning permission for:

"Development likely to generate noise pollution; or

Development sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided."

4.58. Any developments that exceed Camden's Noise and Vibration Thresholds will not be permitted. The Council will only grant permission for plant or machinery if it can be operated without causing harm to amenity and does not exceed the Council's noise thresholds.

4.59. During demolition and construction the Council will seek to minimise the impact on local amenity. Where these phases are likely to cause harm, conditions and planning obligations may be used to minimise the impact.

4.60. Policy CP29 (Improving Access) outlines how the Council will seek to promote fair access and remove the barriers that prevent people from accessing facilities and opportunities. The Council will:

“Expect all buildings and places meet the highest practicable standards of access and inclusion;

Require buildings and spaces that the public may use to be designed to be as accessible as possible;

Expect facilities to be located in the most accessible parts of the borough;

Expect spaces between buildings to be fully accessible;

Encourage accessible public transport;

Secure car parking for disabled people; and

Secure accessible homes.”

Supplementary Planning Documents

4.61. Supplementary Planning Documents (SPDs) play an important role in the determination of planning decisions by providing more information on how the Council apply planning policies in Camden. Of particular relevance to the proposals is the Camden Planning Guidance SPD. This guidance has been taken into account in developing the proposals.

Emerging Local Plan (Submission Draft - 2016)

4.62. The Camden Local Plan sets out the Council’s planning policies and will eventually replace the current Core Strategy and Development Policies planning documents. The planning policies of relevance to the proposals are provided below.

4.63. Policy H2 (Maximising the Supply of Self-contained Housing from Mixed-use Schemes) states that:

4.64. *“the Council will seek to exceed the target for self-contained homes by expecting non-residential development to provide a mix of uses including the maximum appropriate provision of self-contained housing.*

4.65. *We will particularly expect sites in the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road to be developed for a mix of uses including self-contained housing. In these locations, where development involves additional floorspace of more than 200 sqm (GIA), we will require 50% of all additional floorspace to be self-contained housing.*

- 4.66. *We will require self-contained housing to be provided on site, particularly where 1,000sq m (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing housing in association with the development is appropriate but on-site housing is not practical, we will seek provision of housing on an alternative site nearby, or exceptionally a payment in-lieu.*
- 4.67. *In considering whether to seek a mix of uses including housing, whether housing should be provided on site, the most appropriate mix of uses, and the scale and nature of any provision of housing and other uses, the Council will take into account:*
- a) The character of the development, the site and the area;*
 - b) Site size, and any constraints on developing the site for a mix of uses;*
 - c) The priority the Local Plan gives to the jewellery sector in the Hatton Garden area;*
 - d) The need to add to community safety by providing an active street frontage and natural surveillance;*
 - e) Whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;*
 - f) The extent of any additional floorspace needed for an existing user;*
 - g) Whether the development is publicly funded or serves a public purpose;*
 - h) The impact of a mix of uses on the efficiency and overall quantum of development;*
 - i) The economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and*
 - j) Whether an alternative approach could better meet the objectives of this policy and the Local Plan.*
- 4.68. *In the Central London Area and the town centres listed in this policy, where provision of self-contained housing is appropriate but the development's provision of housing falls significantly short of the Council's 50% target due to financial viability, and there is a prospect of viability improving prior to completion, the Council will seek a deferred contingent contribution. The deferred contribution will be based on the initial shortfall and an updated assessment of viability when costs and receipts are known as far as possible."*
- 4.69. Policy H4 (Maximising the Supply of Affordable Housing) outlines how the Council will expect a contribution to affordable housing on all developments that include housing and provide one or more additional homes. Note that the Council considers that *"where affordable housing cannot practically be provided on site, or off-site, the Council may accept provision of affordable housing off-site in the same area, or exceptionally a payment-in-lieu.*

- 4.70. *In considering whether affordable housing provision should be sought, whether provision should be made on site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:*
- a) *The character of the development, the site and the area;*
 - b) *Site size and any constraints on developing the site for a mix of housing including market and affordable housing, and the particular types of affordable provision sought;*
 - c) *Access to public transport, workplaces, shops, services and community facilities;*
 - d) *The impact on creation of mixed, inclusive and sustainable communities;*
 - e) *The impact of the mix of housing types sought on the efficiency and overall quantum of development;*
 - f) *The economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and*
 - g) *Whether an alternative approach could better meet the objectives of this policy and the Local Plan.*
- 4.71. *Where the development's contribution to affordable housing falls significantly short of the Council's targets due to financial viability, and there is a prospect of viability improving prior to completion, the Council will seek a deferred contingent contribution, based on the initial shortfall and an updated assessment of viability when costs and receipts are known as far as possible."*
- 4.72. Policy C6 (Access for All) outlines how the "Council will seek to promote fair access and remove barriers that prevent everyone from accessing facilities and opportunities. The Council will:
- a) *Expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all;*
 - b) *Expect facilities to be located in the most accessible parts of the borough;*
 - c) *Expect spaces, routes and facilities between buildings to be designed to be fully accessible;*
 - d) *Encourage accessible public transport; and*
 - e) *Secure car parking for disabled people."*
- 4.73. The Council will seek to ensure that development meets the principles of lifetime neighbourhoods.
- 4.74. Policy E1 (Economic Development) states that the Council will secure a strong economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. The Council will:

- a) *“Support businesses of all sizes, in particular start-ups, small and medium- sized enterprises;*
- b) *Maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;*
- c) *Support local enterprise development, employment and training schemes for Camden residents;*
- d) *Encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;*
- e) *Support the development of Camden’s health and education sectors and promote the development of the knowledge quarter around Euston and King’s Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan;*
- f) *Direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sq m of office floorspace between 2014 and 2031;*
- g) *Support Camden’s industries by:*
 - i. *Safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;*
 - ii. *Supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites;*
 - iii. *Safeguarding the borough’s main Industry Area;*
 - iv. *Promoting and protecting the jewellery industry in Hatton Garden;*
- h) *Expect the provision of high speed digital infrastructure in all employment developments; and*
- i) *Recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.”*

4.75. Policy E2 (Employment Premises and Sites) outlines how the Council will encourage the provision of employment premises and sites in the borough. The Council will protect 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 CAZ or local economy.

4.76. The Council state that they will resist development of business premises and sites for non-business use unless it is demonstrated to the Council’s satisfaction that:

- a. *“The site or building is no longer suitable for its existing business use; and*

- b. That the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.*

4.77. We will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided that:

- c. The level of employment floorspace is increased or at least maintained;*
- d. The redevelopment retains existing businesses on the site as far as possible, and in particular industrial and warehouse/logistic uses that support the functioning of the CAZ or the local economy;*
- e. It is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy;*
- f. The proposed premises include floorspace suitable for start-ups, small and medium enterprises, such as managed affordable workspace where viable;*
- g. The scheme would increase employment opportunities for local residents, including training and apprenticeships;*
- h. The scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and*
- i. For larger employment sites, any redevelopment is part of a comprehensive scheme."*

4.78. Policy A1 (Managing the Impact of Development) states how the Council will seek to protect the quality of life occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity. The Council will:

- a) "Seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
- b) Seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*
- c) Resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*
- d) Require mitigation measures where necessary."*

4.79. The factors we will consider include:

- a) "Visual privacy, outlook;*
- b) Sunlight, daylight and overshadowing;*

- c) *Artificial lighting levels;*
- d) *Transport impacts, including the use of Transport Assessments, Travel Plans and Servicing and Delivery Management Plans;*
- e) *Impacts of the construction phase, including the use of Construction Management Plans;*
- f) *Noise and vibration levels;*
- g) *Odour, fumes and dust;*
- h) *Microclimate;*
- i) *Contaminated land; and*
- j) *Impact upon water and wastewater infrastructure.”*

4.80. Policy A4 (Noise and Vibration) states that the Council will seek to ensure that noise and vibration is controlled and managed. Development should have regard to Camden’s Noise and Vibration Thresholds (Appendix 2 of the Plan). We will not grant permission for:

- a) *“Development likely to generate unacceptable noise and vibrations impacts; or*
- b) *Developments sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.”*

4.81. Permission for noise generating development, including plant, will only be granted if it can be operated without causing harm to amenity. We will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phase.

4.82. Policy D1 (Design) states that The Council will seek to secure high quality design in development. The Council will require that development:

- a) *“Respects local context and character;*
- b) *Reserves or enhances the historic environment and heritage assets in accordance with Policy D2 - Heritage;*
- c) *Is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d) *Is of sustainable and durable construction and adaptable to different activities and land uses;*
- e) *Comprises details and materials that are of high quality and complement the local character;*

- f) *Integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
- g) *Is inclusive and accessible for all;*
- h) *Promotes health;*
- i) *Is secure and designed to minimise crime and antisocial behaviour;*
- j) *Responds to natural features and preserves gardens and other open space;*
- k) *Incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping, incorporates outdoor amenity space;*
- l) *Preserves significant and protected views;*
- m) *For housing, provides a high standard of accommodation; and*
- n) *Carefully integrates building services equipment.”*

4.83. The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

4.84. Policy D2 (Heritage) states that they will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

4.85. The Council will not “*permit the loss of or substantial harm to a designated heritage asset, including Conservation Areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- a) *The nature of the heritage asset prevents all reasonable uses of the site;*
- b) *No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c) *Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d) *The harm or loss is outweighed by the benefit of bringing the site back into use.*

4.86. *The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.”*

- 4.87. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:
- a) *“Require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
 - b) *Resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
 - c) *Resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
 - d) *Preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.”*
- 4.88. Policy CC1 (Climate Change Mitigation) states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The Council will:
- a) *“Promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;*
 - b) *Require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;*
 - c) *Ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;*
 - d) *Support and encourage sensitive energy efficiency improvements to existing buildings;*
 - e) *Require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and*
 - f) *Expect all developments to optimise resource efficiency.”*
- 4.89. Policy CC2 (Adapting to Climate Change) states that the Council will require development to be resilient to climate change and that all developments should adopt appropriate climate change adoption measures such as:
- a) *“The protection of existing green spaces and promoting new appropriate green infrastructure;*
 - b) *Not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems;*
 - c) *Incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and*

d) Measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.”

4.90. Any development involving 5 or more residential units or 500sqm of more of any additional floorspace is required to demonstrate the above in a Sustainability Statement. The Council will promote and measure sustainable design and construction by:

e) Ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation;

f) Encourage new build residential development to use the Home Quality Mark and Passivhaus design standards;

g) Encouraging (conversions and extensions) of 500 sqm of residential floorspace or above or five or more dwellings to achieve “excellent” in BREEAM domestic refurbishment; and

h) Encouraging non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.

4.91. Policy T1 (Prioritising Walking, Cycling and Public Transport) outlines the measures that the Council will use to promote sustainable transport by prioritising walking, cycling and public transport in the borough.

4.92. Policy T2 (Parking and Car-Free Development) states how the Council will limit the availability of parking and require all new developments in the borough to be car-free

5. Planning Assessment

- 5.1. This section assesses the proposals against the national, regional and local planning policy framework having regard to relevant material considerations.

PRINCIPLE OF PROPOSED LAND USE

Office Floorspace

- 5.2. Bedford House already provides office floorspace; therefore, the principle of the proposed land use is acceptable. The principle of providing additional floorspace is also supported by Policy CS8 and Emerging Local Plan (ELP) Policy E1 which sets out a need to secure a strong economy in the borough through the provision of office floorspace in Central London. The additional floorspace will help LBC to meet the demand that has been identified for 695,000 sqm of office floorspace in central locations between 2014 and 2031.
- 5.3. The application site is also located in a highly accessible location; therefore, the proposal complies with Policy CS1 which promotes development in such locations. Optimising the potential of the existing floorspace and thus the site is also supported by planning policies.
- 5.4. As required under ELP Policy E1 the proposals seek to support Camden's industries by supporting proposals for the intensification of employment sites and premises where these provide additional employment and other associated benefits.
- 5.5. The proposal also complies with Policy 4.2 of the London Plan which promotes the renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility.

Potential for Mixed Use Development

- 5.6. As stated in Policy DP1 and ELP Policy H2 a mix of uses in development is sought in all parts of the borough. In Central London Areas, where more than 200 sq m (gross) additional floor space is provided, 50% of additional floor space is sought as housing through this policy. The Policy seeks provision to be on-site particularly for developments providing 1,000 sqm. The proposal is for less than 1000 sqm of office floorspace; therefore, there is already an acknowledgement in the policy that it may not be possible to introduce a residential use on-site. Where it can be demonstrated that the residential use would be inappropriate for the area or cannot practically be achieved on the site, the policy allows the Council to accept a contribution to the mix of uses elsewhere in the area, or exceptionally a payment in lieu.
- 5.7. Policy DP1 outlines that the Council will take into account the following criteria when considering the mix of uses sought and whether it is appropriate to seek the full contribution of new floorspace as residential up to the 50% threshold:
- a) *“the character of the development, the site and the area;*
 - b) *site size, the extent of the additional floor space, and constraints on including a mix of uses;*

- c) *the need for an active street frontage and natural surveillance;*
- d) *the economics and financial viability of the development including any particular costs associated with it;*
- e) *whether the sole or primary use proposed is housing;*
- f) *whether secondary uses would be incompatible with the character of the primary use;*
- g) *whether an extension to the gross floor space is needed for an existing user;*
- h) *whether the development is publicly funded; and*
- i) *any other planning objectives considered to be a priority for the site.”*

5.8. ELP Policy H2 makes some minor amendments to these and also notes that the Council will take into account the following:

- a) *“whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;*
- b) *the extent of any additional floorspace needed for an existing user;*
- c) *the impact of a mix of uses on the efficiency and overall quantum of development; and*
- d) *the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing.”*

5.9. Having regard to these points, there is robust justification as to why it would not be appropriate and practical for this proposal to accommodate a residential use on-site as set out in the following section.

Existing Office Accommodation

5.10. Bedford House provides businesses with a different type of office offer when compared to the other smaller office properties in the locality. The building falls outside of the office sub markets of Holborn, Chancery Lane and Kings Cross but it is well located between these sub-markets. Whilst it is slightly off the main office sub-markets, the building benefits from good levels of natural light and amenities; however, the optimum sized floor plates cannot be achieved due the central core location which interrupts the flow of the space and effectively cuts the floor plate in two areas. This reduces the efficiency and flexibility of the floor plate thus negatively impacting on the attractiveness of the space. Feedback from tenants and prospective occupiers has also confirmed that the existing layout makes inter company management and communications challenging. The lack of flexibility has hindered attractiveness to many occupiers, and this is confirmed by the Letting and Space Availability Note prepared by Metrus Limited which is appended at Appendix 1.

- 5.11. The objective of the proposal is therefore to improve the attractiveness of the property by optimising the floorplate. Improved circulation will be created by a new central core, thus aiding efficiency. This allows for a more open and flexible floor plate that will be much more attractive to occupiers' needs and flexibility of use. A significant proportion of the additional floorspace to be created is therefore circulation space rather than 'functional' office floorspace. These specific circumstances are material to the consideration of Policy DP1 and ELP Policy H2.
- 5.12. Given that the Council (through Policy CS8) wishes to safeguard existing office floorspace, works are required to improve the attractiveness of the floorspace such that the building can continue to maintain the existing and successfully attract occupiers. Furthermore, given that policies require the optimisation of highly accessible brownfield land, the proposal will accord with this objective by providing improved circulation which will allow the office floorplates to be optimised.

Nature of Site and Proposed Works

- 5.13. As explained above, the site is constrained and this has resulted in a compromised quality and efficiency of existing office accommodation within the building. By introducing the extensions to the central block, the circulation and core arrangement can be reconfigured. Approximately 460.7 sqm of the new floorspace is circulation and ancillary space. This does not actually comprise 'functional' office floorspace which can be used for desk or meeting space. The 'functional' office floorspace to be created comprises only 508.2 sqm and this is located in the roof extensions. Having regard to criteria b) of Policy DP1, and in the circumstances of the site and nature of the proposal, whereby, a significant proportion of the new floorspace will comprise circulation space, it is considered that in applying Policy DP1, it would be appropriate to apply this only to the 'functional' floorspace. Therefore, approximately 254.1 sqm of residential floorspace is expected under this policy.
- 5.14. Paragraph 2.27 of CPG2 (Housing) confirms that Policy DP1 is not triggered by increases in net non-residential floorspace that takes place wholly within the existing building envelope as such, whilst the proposals will optimise the internal floorspace, this is not relevant to the assessment in this regard.

Character of the Development, the Site and the Area

- 5.15. Since Bedford House was constructed in the 1950s, it has been used to provide employment floorspace. Introducing a residential use onto the site would therefore be contrary to this. Furthermore, given that a significant proportion of the new floorspace is circulation space, the character of the development is such that introducing a residential use would impact on the viable delivery of the improvements proposed.
- 5.16. The character of the area surrounding the site is mixed comprising also of residential dwellings; a public house, a school and a number of smaller offices. As there is already a mix of uses demonstrated in this location this provide further justification under criteria a) for not providing residential floorspace on site.

- 5.17. It is also noted that the area has recently lost office floorspace to residential use when 20 John Street was converted to a residential use. In this case, 482 sqm of office floorspace was converted to residential use. 19 John Street and 13/15 John's Mews also have approvals for office to residential conversions. Through these three applications, 689 sqm of office floorspace has already been lost in the area. The creation of 508.2 sqm of 'functional' office floorspace will therefore reduce the overall loss of office floorspace in the area to 180.80 sqm. As such when considering the balance of uses in the immediate vicinity there has already been a significant quantum of residential floorspace introduced. As such, it would be entirely appropriate in this particular case to retain all of the new floorspace in office use.

Existing Occupiers and Prospective Tenants

- 5.18. As already stated, feedback from tenants and prospective occupiers has confirmed that the existing layout makes inter company management and communications challenging. This detrimentally affects the efficiency and attractiveness of the space. The improved circulation and increased floorspace will thus deliver benefits for existing users allowing them to optimise, and expand, into the improved (more efficient) floorplates. It will also allow existing tenants an opportunity to expand into the new 'functional' floorspace. In such circumstances where the primary objective of proposals is to provide additional office floorspace and when there is no surplus floorspace being provided under Paragraph 1.23 of the supporting text for Policy DP1 the Council state that they will not seek housing or other secondary uses.
- 5.19. The only suitable or viable location where residential floorspace could be provided is at ground and lower ground floor level fronting John's Mews. This part of the site is currently fully occupied by existing tenants and therefore not available for providing residential floorspace accommodation. In the instance that the Council did require residential floorspace in this location and existing tenants were not prepared to move offices within the site this may result in the loss of employment on the site.
- 5.20. Where an extension to the floor space is needed for an existing user, the Council have previously accepted that residential floorspace would not need to be provided. Examples include, but are not limited to proposals at 2 Marylebone Road & 1- 9 Albany Street (application reference: 2013/5840/P) approved in April 2014.

Job Creation

- 5.21. The existing (partly vacant) office currently provides 161 jobs. By delivering the improvements proposed, there is potential to fully occupy the premises and create an uplift in employment. The total GIA of the building will increase to 4,595.82 sqm GIA; therefore, applying an employment density of 1 job per 11.3 sqm (in line with the London Employment Sites Database May 2016 report which was commissioned by the GLA), there is potential for 407 jobs within the completed development, representing an uplift of 246 jobs.

Other Employment Considerations

- 5.22. The primary objective of the proposals is to optimise and improve the employment floorspace within Bedford House to improve the quality and flexibility of the premises. Such improvements to employment floorspace are supported by London Plan Policy 4.2. The provision of residential floorspace at Bedford House would conflict with this policy requirement and would take up space that could otherwise provide employment use.
- 5.23. Alongside the intentions of policy DP1 and ELP Policy H2, the content of Policy CS8 should be considered which seeks to ensure a successful economy within Camden and to seek to meet the forecast demand of 615,000 sqm of new office floorspace within Camden by 2026. Policy CS8 also states how the Council will support industries by “*safeguarding existing employment sites and premises in the borough that meets the needs of modern industry and other employers*”. The proposals seek to improve the existing floorspace which will assist in safeguarding this existing employment site by ensuring it remains attractive. As such, requiring the provision of residential accommodation on-site must be balanced against the requirements to provide, protect and improve the floorspace to support the economy in Camden.
- 5.24. The 2014/15 Annual Monitoring Report (AMR), which is the most recent AMR produced by the Council, outlines how the Council has achieved a net gain of 52,204 sqm of B1 office floorspace in 2014/15. However, this is the result of a number of large office developments within the borough including the completion of 6 Pancras Square in King’s Cross which provided a net gain of 41,035 sqm of floorspace. It should be noted however that the general trend is that there is a loss of small offices (or part of) within the borough with a total of 43 schemes having lost B1 floorspace. Only seven schemes involved a net gain of floorspace. Further, the AMR outlines that at the end of September 2015 there were 135 approvals for permitted development (PD) change of use from office to residential. The overall impact on the approved PD schemes would be the loss of 65,000 sqm of office floorspace.
- 5.25. Proposals to improve the attractiveness of this office floorspace which provides for small businesses should therefore be received positively in this context.
- 5.26. Finally Policy DP13 notes how the Council will retain buildings that are suitable for continued business use and will resist a change to non-business use. Bedford House is a suitable premises for business use due to its close location to Central London and its excellent accessibility to public transport infrastructure. It does not however provide optimum floorplates which affects the usability, efficiency and attractiveness of the floorspace. In the instance that the Council requires residential floorspace on site it would conflict with the purpose of Policy DP13 which seeks to restrict the loss of business floorspace.

Design and Amenity Considerations

- 5.27. It is also relevant to consider whether the constraints associated with the site would impact on the quality of residential accommodation. In the context of this site, it is considered that the provision of residential units into Bedford House would result in poor quality residential environment for future occupants.

- 5.28. The Applicant has tested different scenarios for providing residential floorspace on site. One of these options was to provide residential floorspace within the main roof extension fronting John's Street. This option is not appropriate as it would result in the need to provide a separate residential access and core. This would result in a significant proportion of the residential and office floorspace being given over to circulation space, meaning that useable residential floorspace would be significantly reduced. The resulting layout would be inefficient and the proposal would not optimise the potential of the site which would be contrary to national, regional and local policy requirements.
- 5.29. An alternative scenario tested considered the provision of residential floorspace to the rear of Bedford House along John's Mews. This design testing is illustrated on Pages 16 - 18 within the submitted Design and Access Statement. In this scenario, the resulting residential dwellings would either be single aspect or in the instance where dual aspect is possible one aspect would have a very poor outlook into the internal light wells / service courtyard. There would be an overbearing impact and sense of enclosure from the other parts of the property and in the case of any properties in the northern lightwell from the adjoining 11 storey John Street building. Furthermore, the separation distances between the residential and office use would be limited to only approximately 5.9m. As a result there would be overlooking and privacy issues arising. The daylight and sunlight levels into the dwellings would also be expected to be poor as a result of a combination of: part of the dwellings being below ground level, single aspect; and shading from the other parts of the property.
- 5.30. Whilst bolt-on balconies could be introduced along John's Mews to provide private amenity space, these would further impact upon the receipt of daylight/sunlight in the windows beneath the balconies. This would further reduce the quality of already poor quality units.
- 5.31. The cumulative amenity issues arising in terms of overlooking and privacy, poor outlook, overbearing impact and sense of enclosure, poor daylight and sunlight and aspect would result in a poor quality of accommodation. Whilst it may be possible to introduce oblique windows or opaque glass to the office floorspace to design out overlooking/privacy issues, the other identified cumulative issues would remain, thus the amenity for future residents would remain poor.
- 5.32. Disabled access arrangements for these residential dwellings will also be poor as the building levels do not align with the street. The ground floor level is between 700mm to 1130mm above the street level; therefore, it would not be possible to provide level access. As a result residential dwellings would not meet the requirement for 10% wheelchair housing as required under Policy DP13 and the London Plan.
- 5.33. There would also be further difficulties in providing appropriate servicing and cycle parking provision for residents. Relying on provision within the service courtyard would result in management issues as the space is used and is proposed to be maintained as a service courtyard for the office use. It would not be possible to make provision for cycle / refuse storage in front of, or within, the properties either given the level differences identified.

- 5.34. Taking into account the above, the provision of a residential use on site is not practical or appropriate. It would result in an inefficient use of a highly accessible site contrary to planning policies at the national, regional and local level. Further, any such residential use provided would be of a poor quality given the cumulative amenity issues that arise given the site constraints, thus this would be contrary to ELP Policy D1, Policy DP24 and London Plan policies which require all development to be of a high quality. Proposals would also not meet the requirements of Policy DP26 with regard to visual privacy, overlooking and outlook. The residential dwellings would therefore not be policy compliant.

Off-site provision

- 5.35. As it has been demonstrated that it not appropriate or practical to provide residential floorspace on site it is acknowledged that under Policy CP1 the Council may accept a contribution to the mix of uses elsewhere in the area or 'exceptionally' through a payment-in-lieu.
- 5.36. The Applicant does not own any other properties or sites in the borough; therefore, it is not possible for them to contribute to providing residential dwellings on a site that they do not have control over. In such instances the Council have accepted a payment-in-lieu. An example of this includes, but is not restricted to, the development at 262 – 267 High Holborn (application reference number: 2013/3983/P).
- 5.37. The Applicant is willing to discuss the principle of a payment-in-lieu to the Council for off-site provision. That said, as already set out, the proposal seeks to optimise the existing office use with significant works relating to the optimisation; therefore, the amount of office floorspace that is actually 'functional' i.e. for desk and meeting space is limited. This will therefore need to be factored into these discussions, particularly in relation to scheme viability.

Affordable Housing Contribution

- 5.38. The potential level of residential floorspace required would not meet the threshold for affordable housing set out in current Policy DP3. We are mindful that ELP Policy H4 requires developments that provide one or more homes will be required to contribute towards affordable housing. As detailed above providing housing on site is inappropriate, therefore, the Applicant will consider satisfying this Policy through a payment-in-lieu, subject to viability considerations.

Conclusion on Land Use

- 5.39. The development is seeking to make best use of the site which is situated within a highly accessible location where development is promoted under Policy CS1. Whilst Policy DP1 and ELP Policy H2 seeks to promote mixed uses on individual sites, it would not be appropriate or practical to introduce a residential use on this site, for the reasons discussed above and summarised below:
- 5.40. The site is in a suitable location for office use and optimising the use is supported by planning policy.
- 5.41. The existing office accommodation is sub-optimal and inflexible which affects its attractiveness to, and usability by, occupiers. A significant proportion of the new floorspace will aid improved circulation; therefore, it will not be 'functional' space that can be utilised for desk space or meeting space.

- 5.42. Policies seek to increase and safeguard office floorspace in the borough; therefore, the proposals should be considered in this context as they are primarily seeking to optimise and therefore safeguard the existing floorspace which provides a different type of office offer for potential occupiers.
- 5.43. The proposal will benefit existing occupiers allowing them to optimise, and expand, into the improved floorplates, and will provide potential for them to expand into the new 'functional' floorspace.
- 5.44. The site has always been in office use and the proposal seeks a continuation of this. The improvements will safeguard the use in line with planning policy.
- 5.45. The character of the area is already mixed, and a significant amount of office floorspace has already been converted to a residential use (or has been approved for conversion) in the immediate vicinity on three adjacent sites.
- 5.46. There have been a significant number of schemes in the borough that have resulted in the loss of office floorspace, particular from smaller offices. In 2014/15, 43 schemes resulted in a net loss of office floorspace. Further, there is potential for the loss of 65,000 sqm of office floorspace through approved office to residential permitted development schemes.
- 5.47. Design testing has been undertaken and this has shown that introducing a residential use would not be appropriate or practical as it would result in an inefficient use of the site, and would result in very poor quality accommodation. This is due to the cumulative amenity and other issues identified in relation to overlooking, privacy, poor outlook, overbearing impact and sense of enclosure, poor daylight and sunlight, aspect, private amenity space; level access, cycle parking and servicing issues.
- 5.48. The building is also tenanted so converting to residential is not possible.
- 5.49. Policy 4.3 of the London Plan is clear that developments should not be required to provide a mix of uses when such a mix would demonstrably conflict with other policies within the London Plan. This has been demonstrated above. Further policy DP1 and ELP Policy H2 already acknowledges that it is schemes that provide more than 1000 sqm which are most likely to be able to accommodate the residential use. This scheme does not provide this quantum of development. A wholly office proposal on this site is therefore supported and would be fully compliant with regional and local planning policies.
- 5.50. The Applicant does not own any other sites within the borough where an off-site provision of residential dwellings could be provided. Instead the Applicant has confirmed that they are willing to discuss the principle of a contribution, subject to wider viability considerations.

Design and Heritage

- 5.51. The proposals have been developed taking into consideration Policy CS14, Policy DP24, ELP Policy D1 the NPPF and the London Plan which require proposals to be of the highest standard of design that respects local context, character, local setting and scale of neighbouring dwellings. A Heritage Assessment which assesses the impact of the proposals on heritage assets has been prepared to comply with policy requirements. This provides a comprehensive review of the relevant heritage assets and how the proposed development responds to these. Expert heritage advice was sought at an early stage in the design process to ensure that the proposals were sensitively developed. The proposals have therefore undergone an iterative design process, also taking account of advice received from the Council during the pre-application process.
- 5.52. Each aspect of the development has been considered below in turn, and this assessment should be read in conjunction with the Design and Access Statement, and Heritage Assessment that have been submitted with the application.

Roof Extension on Main Block Fronting John Street

- 5.53. During pre-application discussions, Officers indicated that a two storey vertical extension above the existing block fronting John Street would not be acceptable due to the bulk that it would add to the skyline and the resulting impact on the surrounding character. To respond to these comments the main roof extension on Bedford House has been reduced from the two storey scheme presented at the pre-application stage to a one storey extension. In addition to this the extension has been set back from the edge of the existing roof by approximately 3.5m.
- 5.54. The CGI's included within Page 25 of the Design and Access Statement demonstrate that on the approach to Bedford House along John Street the roof extension disappears entirely as you approach the site along John Street. The roof extension responds to the existing atrium on the listed building to the north as well as resolves the present blank appearance of the flank wall in distant views from the south. The set back and reduced height of the extension also ensures that the proposals are only visible in oblique and glimpsed views from John Street.
- 5.55. In comparison to the two storey pre-application proposals, the one storey extension results in a minor change in views from Roger Street to the east (shown on page 27 of the DAS). This view presently takes in a varied streetscape including a number of roof extensions to modern buildings. As such the proposals are considered to improve the appearance of Bedford House without altering the existing character of the conservation area. This results in the proposals meeting the requirements of LP Policy 7.7, Policy CS14 and Policy DP24.
- 5.56. This is illustrated on the townscape views in the submitted Design and Access Statement. Only a small section of roof extension is now visible from Roger Street. This demonstrates how the building will not have an unacceptable harmful impact on their surroundings and respects the surrounding heritage assets as required under LP Policy 7.7, Policy CS14, Policy DP24 and ELP Policy D2.

Roof Extension on Rear Block on John's Mews

- 5.57. The single storey roof extension to the rear block along John's Mews will result in the height of the roof which mediates between the two adjoining properties at 11 John's Mews to the south and 4 John's Mews to the north. This infill will result in there being a more uniform roof line along John's Mews. The Council pre-application response confirm in principle support for this extension. It was also raised in the pre application response that the initial design for this extension was 'overly formal and office like'. Taking this into account, the design has been amended to break down the elevation with vertical emphasis provided by breaks in the proposed glazing. The character of John's Mews as well as other mews streets within the Bloomsbury Conservation Area has supported a number of high quality contemporary architectural additions. This results in the proposals being more in keeping with the surrounding character of the adjacent mews buildings.
- 5.58. The predominant materials proposed for the extensions at second and fifth floor will be a composite metal cladding complemented with bi-folding glazed doors. The materials proposed for the roof extensions do not try to replicate and compete with the existing and surrounding buildings but instead seek to promote the distinctiveness of the proposals. All other proposed extensions will comprise bricks to match the existing building. A set back glass balustrade will be fitted around the terrace area at fifth floor level; however, this will not be visible from street level or longer views.

Core and Lower Ground Extensions

- 5.59. The extensions to the central block will include the provision of a new circulation core in the southern courtyard which will house the new stairs, lift shafts, lobby, toilets and riser. This will serve all floors including the proposed roof extension. The new core and extensions to the existing will not rise higher than the proposed roof extension and will fit seamlessly into the existing built form. As agreed by the Council in pre application discussions these works are considered to have little prominence on the street scene.
- 5.60. The proposals rationalise the taller elements of the rear elevation of Bedford House, making them appear much neater and less haphazard in comparison to the current arrangement . These improvements will enhance the appearance of the building thus improving the quality of the surrounding area. This is particularly noticeable from the townscape view from John's Mews looking north provided at Page 28 of the submitted Design and Access Statement.
- 5.61. The existing fire escape staircase on the central block is to be replaced with a new fire escape in the northern courtyard of the site. This is considered to be a much more discrete location for the metal stairs. The provision of these escape stairs are required for the building to comply with Building Regulations.
- 5.62. The proposals presented during pre application discussions proposed aluminium framed black windows to replace the existing. Officers considered that these were inappropriate as they did not match the local context. In response to these comments it is proposed to replace the existing windows to match the existing windows and the style along Johns Street. It is considered that these works do not comprise 'development'.

- 5.63. As part of the modernisation of the office floor plate, internal reconfiguration works are proposed. Whilst these works do not require planning permission, the extended size of the reception and waiting area necessitates alterations to the main entrance which is proposed to be widened. During pre application discussions LBC Officers confirmed that these works were acceptable as they are considered to be of a scale to match that of Bedford House.
- 5.64. As all extensions are lower than the adjacent property at 21 John Street the proposals will not impact on the designated view 6A.1 Blackheath Point to St Paul's Cathedral.

Design and Heritage Conclusion

- 5.65. Taken together, the proposals are considered to improve the overall appearance of what is currently a bland, architecturally unremarkable building. These alterations have been developed to improve the junction of the existing structure with the surrounding listed building, enhancing views along John Street and John's Mews.
- 5.66. Consequently the proposals are considered to improve the setting of the surrounding listed buildings, as well as the character and appearance of the conservation area. To this end, the proposals respond positively to the requirements of both Policy DP24, Policy CS14 and ELP Policy D2.
- 5.67. More details of the design matters are provided within the submitted Design & Access Statement and an assessment of the heritage impacts is provided in the Heritage Assessment.

Amenity

Noise

- 5.68. Policy DP28 and ELP Policy A4 sets out standards for noise and vibration that all new developments in the borough will need to meet. This relates not only to the noise that new development may create (that is, the impact of new development upon existing uses, particularly nearby residential uses) but also whether the existing noise environment is appropriate to allow the use being proposed to operate.
- 5.69. An assessment of both the existing background noise environment and the proposed plant equipment that would be installed as part of this development has been undertaken by KP Acoustics. This assessment should be considered in full but the broad conclusion is that no further mitigation measures would be required to achieve recommended internal noise levels.
- 5.70. Currently the exact details of the proposed extraction system are unknown, however, once these details are finalised, the submitted Preliminary Planning Compliance Report will be finalised to include calculations which demonstrate compliance with the criteria of The London Borough of Camden for noise emissions.

Daylight/Sunlight

- 5.71. The Council acknowledged during pre-application discussions that the proposed extensions would be located a sufficient distance away from neighbouring occupiers for there not to be any adverse impact in terms of daylight / sunlight.
- 5.72. The Council's approach to daylight and sunlight assessment is set out in Camden Planning Guidance 6 (CPG6). This document refers to the requirements of the BRE's '*Site layout planning for daylight and sunlight: A guide to good practice*' which provides nationally applicable discretionary guidance that should be applied flexibly having regard to the specific site context – in this case a central, highly accessible, urban location
- 5.73. A daylight and sunlight assessment of all relevant surrounding buildings has been undertaken by Right of Light Consulting and their formal report has been submitted as a part of this application. This concludes that the development will have a low impact on the light received by neighbouring properties.
- 5.74. All main habitable rooms in the neighbouring properties pass the Vertical Sky Component test with the exception of a few windows on a marginal basis. All of the tested main habitable rooms also pass the Daylight Distribution test. As noted that the BRE guide is intended to be used flexibly, and given the accessible central location of the site it is considered that the proposals will not have an unacceptable impact on daylight receipt to neighbours.
- 5.75. All relevant neighbouring windows which face within 90 degrees of due south have been tested for direct sunlight. All living room windows pass both the total annual sunlight hours test and the winter sunlight hours test. The proposed development therefore satisfies the BRE direct sunlight to window targets.
- 5.76. There are no overshadowing concerns arising from the proposal either.
- 5.77. The proposed development is therefore acceptable in relation to its daylight and sunlight impacts on neighbours.

Outlook, Overlooking and Privacy

- 5.78. As confirmed by the Council during pre-application discussions the proposed extensions would be located a sufficient distance away from neighbouring occupiers for there not to be any adverse impact on neighbours in terms of outlook, overlooking or privacy.

Sustainability and Energy

- 5.79. As the nature of the development is to optimise and extend an existing building the proposals seek to make efficient use of an existing building as encouraged through ELP Policy CC1, Policy CS13, the London Plan and NPPF.

- 5.80. As set out under Policy DP22 and ELP Policy CC1, all new developments in Camden are expected to be sustainable and achieve energy efficiencies with a series of defined targets and criteria which new development should meet whether this is for residential, non-residential, new build or refurbished accommodation. For non-residential developments, improved sustainability is measured through either BREEAM New Construction or BREEAM Non-Domestic Refurbishment as relevant to whether or not development is new build.
- 5.81. Further detailed guidance is set out in CPG 7 “Sustainability”, which sets a number of additional targets relating to energy and resource use issues, including a target for developments to seek a 20% reduction in carbon dioxide emissions from on-site renewable energy technologies.
- 5.82. The Energy and Sustainability Statement prepared by ERS assesses the energy demand and carbon emission of the proposed development. This calculates that in order to achieve a 20% reduction in carbon dioxide emissions the proposals include a high efficient air source heat pump along with PV panels.
- 5.83. In addition to the above renewable technologies the proposals will be designed with a high level of insulation and low air permeability to reduce heat loss as much as possible. The use of low energy lighting and A-Rated white goods will also be installed where possible. Water efficient appliances will also result in the development using less water per person occupying the building.
- 5.84. From the above and taking into account all the conditions surrounding the site it is concluded that the energy efficiency measures together with the installation of renewable technology will save energy, reduce CO2 emissions and mitigate the environmental impacts of the development in accordance with the requirements of Policy DP22, Policy CS13 and ELP Policy CC2. In striving to achieve the requirements of these policies and as stated as a requirement within the Council’s pre-application response the development will achieve a BREEM rating ‘Very Good’.
- 5.85. In addition the provision of cycle parking and changing facilities, the development will also encourage occupiers to travel to the site by sustainable means of transport. This will minimise the need to travel to the site by car. This further assists to tackle climate change as required under Policy CS13, particularly as the cycle parking is proposed to benefit the existing occupiers as well as the new floorspace.

Transport

- 5.86. A Transport Statement and Framework Travel Plan have been prepared by WYG in accordance with the scope agreed during pre-application discussions. These address a range of matters including parking and servicing. The relevant statements should be considered in full but the key points are summarised below.

Car Parking

- 5.87. Based on the excellent level of accessibility to the site via public transport, demonstrated through the excellent part 6a part 6b PTAL rating, a car free development is proposed. This is encouraged in the London Plan and under Policy DP18 and ELP Policy T2.
- 5.88. In addition, new occupiers will not be allowed to apply for parking permits.

Cycle Parking

- 5.89. The existing premises have no cycle parking or associated facilities. As well as meeting policy requirements for the proposed uplift in floorspace the Applicant is also providing cycle facilities for all existing floorspace within Bedford House. This will result in the whole premises conforming to the latest policy requirements of London Plan which will encourage all occupants to travel sustainably.
- 5.90. For an office use the requirements of London Plan Policy 6.9 are for 1 long stay cycle parking space per 90sqm and 1 short stay space per 500sqm. 70 cycle parking spaces are proposed which will exceed the minimum requirements.
- 5.91. As required under Policy CS11, DP17 and ELP Policy T1 appropriate changing facilities will also be provided to further encourage those working within the building to travel sustainably, either by cycle or on foot.

Servicing

- 5.92. The existing service access will be maintained from John's Mews to the rear of Bedford House. It is envisaged that much of the building servicing and refuse collection will be made from this entrance.
- 5.93. A refuse store is proposed adjacent to the service access which leads onto John's Mews. This store will hold four Eurobins for the storage of waste and recyclables. These will be collected at a frequency to be determined by the needs of the end users. It is envisaged that a management company will move the Eurobins from this location onto the highway, as per existing arrangements. Doing this will mean that a refuse lorry will not have to reverse into the service yard. As these facilities are provided the proposals meet the requirements of Policy CS18.
- 5.94. Further details are set out within the Waste Storage and Collection Plan included within the Design and Access Statement.

Community Infrastructure Levy and S106 Obligations

- 5.95. Following the adoption of Camden's local Community Infrastructure Levy (CIL) in April 2015, this development will be liable for both this and the Greater London Mayoral CIL. In accordance with the relevant regulations, in the event that planning permission is granted then the developer would be liable to pay CIL upon implementation of that permission.
- 5.96. Given the adoption of local CIL, it is not expected that any significant further financial contributions will be requested through S106 legal obligations, other than potentially in relation to a commuted sum for the provision of residential accommodation off-site (this will be further to subject to further discussion with Officers having regard to the case set out in this section).

6. Conclusion

- 6.1. This Town Planning Statement has been prepared on behalf of Benesto Charity Limited to support the proposals to refurbish and extend Bedford House, 21a John Street. The proposal will optimise the existing office use to ensure it remains attractive to office occupiers. The proposals will overcome existing problems with the building, including the sub-optimal floor plates which make inter-company communication and management difficult and which hinder the efficiency and attractiveness of the office use.
- 6.2. The proposals will deliver a number of key planning and regeneration benefits, including:
- Improvements which will enable the optimisation of the existing office floorspace so that it is more suited to modern business occupiers;
 - Additional employment floorspace to enhance the existing employment offer from the site and subsequent benefits to the local economy;
 - Safeguarding and optimisation of an existing employment use in a highly accessible, central London location, in an area where a number of office to residential conversions have taken place recently;
 - Uplift in number of jobs that can be provided on the site, the improvements will deliver potential to create 246 additional jobs on the site;
 - A design that respects the quality and value of the surrounding heritage assets with new architecture that will enhance the appearance of the existing building in its form;
 - A sustainable design approach, which will also deliver reduced energy consumption and carbon dioxide reductions through energy efficient design and the installation of renewable energy technologies;
 - Contributions towards the provision of local infrastructure and facilities through the payment of local and Mayoral Community Infrastructure Levy; and
 - Optimisation and safeguarding of rental income for the applicant who is an established charity that awards grants to support and promote excellence in the fields of science, health, education and the arts & humanities for the benefit of the wider community.
- 6.3. The proposal will optimise and safeguard the existing use which will ensure continued income for the Applicant who is an established charity that awards grants to support and promote excellence in the fields of science, health, education and the arts & humanities for the benefit of the wider community.
- 6.4. This Town Planning Statement has assessed the proposals against the Development Plan, having regard to material consideration relevant to the site and proposal. It has demonstrated that the scheme complies with the detailed objectives of planning policy framework set out in the NPPF, the London Plan, and policies contained within the adopted and emerging local planning policy and supporting documents. In this context, and when also read alongside the range of supporting documents that also form part of this application, the Council is respectfully asked to grant planning permission without delay so that the benefits identified can be realised.



Appendix 1: Letting and Space Availability Note

Bedford House, 21a John Street London EC2

Letting and Space Availability Note

Bedford House is well located between the sub markets of Holborn, Chancery Lane and Kings Cross to the North. Surrounding buildings on John Street and neighbouring roads are considerably smaller and therefore Bedford House offers companies a different proposition, with the opportunity to occupy a building slightly off the main pitch but with the look and feel of a high quality office building. The building benefits from good levels of natural light and amenities although the optimum sized floor plates are not achievable at present as the central core interrupts the flow of the space and effectively cuts the floor plate into two areas. The proposals will address this problem by the creation of a new central core that then removes this issue and gives a much more open and flexible floor plate that will be much more conducive to occupiers' needs and flexibility of use.

The office floors have been refurbished as and when the accommodation have become available and although lettings have been achieved in its altered condition the lack of flexibility of the space has hindered attractiveness to many occupiers. Typical occupiers have been from the legal profession in particular, which is due to the close proximity to the Inns of Court. With changes to London's sub markets, the building would generally attract companies from professional services or potentially from the technology, media and telecommunications sectors.

With the changes in permitted development rights over the past few years, there has been a significant amount of conversion of office space to residential use. Estimations are that there has been circa 6 million square feet of office space converted to residential use. This has had a significant impact upon a market place that was historically short on supply due to the lack of development.

The adjoining building, 20 John Street has recently been converted from offices to residential which has contributed to the circa 20,000 sqft of office floorspace that has been lost on John Street recently. As indicated within Camden's most recent Authority Monitoring Report (2013/14), between the period of 30 May 2013 and 4 August 2014 a total of 87 applications for prior approval were approved in the Borough. This resulted in the loss of circa 50,000 sqm of office floorspace making way for 634 self-contained homes. This has increased the pressure on supply from high levels of demand in the market place.

KEY STATS	SUBMAKET:			MARKET:		
	HOLBORN			LONDON		
	2016 Q2	2015 Q2	2014 Q2	2016 Q2	2015 Q2	2014 Q2
	Last	Previous	5-Year	Last	Previous	5-Year
Vacancy Rate	5.5%	5.9%	7.5%	5.4%	5.9%	6.3%
	12 months	12 months	Average	12 months	12 months	Average
Average Achieved Rent (/SF)	£55.55	£52.39	£47.77	£54.74	£45.95	£43.74
Average Asking Rent (/SF)	£56.13	£51.90	£47.32	£44.26	£39.73	£36.93
Leasing Activity (SF)	501,421	911,082	700,753	13,820,840	21,749,297	16,992,403
Net Absorption (SF)	284,289	175,865	(112,807)	2,539,367	3,498,911	2,673,584
Investment Volume (millions)	£455.9	£1,043.3	£771.0	£14,224.6	£17,191.8	£13,809.2
Average Initial Yield	4.6%	4.5%	5.1%	4.3%	4.7%	5.1%

The Holborn submarket consists of 424 office buildings totalling 14,815,551 sqft. The vacancy rate at the end of 2016 Q2 was 5.5% with an average asking rent of £57.73/sqft.

As specialist letting agents for the owners we consider that to continue the use as high quality commercial offices and increase the building size, therefore creating additional business space is extremely beneficial to the office market in this location. Further, in keeping with the existing office accommodation, the high quality specification for the new office space will be highly attractive to occupiers and assist in fulfilling the market demand. As commented above the new central core opens up the floor plate to improved circulation flexibility. The provision larger floor plates as a result of the proposed changes will be attractive the occupiers as such space is relatively limited in the immediate area. Similarly he provision of external balconies gives occupiers and extra dimension to their occupation on those new floors where it is being provided giving space for both staff amenity and client hosting possibilities.

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