

JM13 LIMITED

**13 – 15 JOHN’S MEWS, LONDON,
WC1N 2PA**

PLANNING STATEMENT

**APPLICATION FOR PLANNING PERMISSION AND
DEMOLITION IN A CONSERVATION AREA**

JULY 2017

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1.0 INTRODUCTION

1.1 This Planning Statement (“the / this Statement”) has been prepared by Montagu Evans LLP as part of an application for planning permission (“the / this Application”) by JM13 Limited (“the Applicant”) for the conversion (“the Proposed Development” / “the Scheme”) of 13-15 John’s Mews, London (“the Site”) to residential.

1.2 The Proposed Development involves the conversion of the building from office (Class B1) to residential (four units), including a mansard extension and new basement level.

1.3 The Application seeks planning permission for the following description of development:

“Partial demolition of existing building and change of use from Class B1 (garage / workshop / offices) to Class C3 residential flats (4 x 2 bed units), including excavation of a basement level, a mansard extension and associated works.”

1.4 The Site benefits from a recent planning permission granted on 31 May 2017 for the change of use of the building to form two residential dwellinghouses (ref. 2014/3330/P) (hereafter referred to as the “2017 Permission”).

1.5 Full details of the proposals are set out in the Design and Access Statement, prepared by Marek Wojciechowski Architects (“MWA”), which forms part of this Application.

Pre-application Engagement

1.6 Pre-application consultation has been undertaken with the London Borough of Camden (LBC) which has informed the design of the scheme, which has been revised to address comments raised during this process.

1.7 Pre-application advice was sought by the Applicant in November 2016 for the change of use of the Site. Formal written pre-application advice was subsequently received on 19 December 2016 from LBC case officer, Gideon Whittingham (ref. 2016/6573/PRE).

1.8 In summary, LBC considers that the principle of change of use is policy compliant as this has already been demonstrated and established through the 2017 Permission. However, it was recommended that any application re-addresses the relevant policies (which have subsequently changed as a result of the new Camden Local Plan, adopted on 3 July 2017).

1.9 In addition to the above, the creation of a basement floor level for residential is considered by officers to be acceptable in principle, subject to detailed basement impact assessment. Further comments on design, sustainability and amenity were provided, which have been considered and responded to in the Application documents, or through design changes.

- 1.10 The Applicant will continue to engage with the planning officers as appropriate following submission of this Application.

Purpose and format of the Planning Statement

- 1.11 The purpose of this Planning Statement is to provide information to allow for an informed assessment of the Proposed Development against relevant national, regional and local planning policy and other material considerations.
- 1.12 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the Application have been taken into account. This assessment brings together the findings of the technical reports identified below and, having regard to these, provides a balanced planning judgement on the merits of the proposals.
- 1.13 The scope of supporting information has been established with regard to the national and local list requirements, alongside feedback during the course of pre-application engagement with LBC officers. The schedule of documents is set out in **Table 1.1** below.

Table 1.1 – Schedule of Application Submission Documents

Title	Author
Schedule JM-1: Documents Submitted	Montagu Evans
Cover Letter	Montagu Evans
Application Form (including Ownership Certificates)	Montagu Evans
Schedule JM-2: Drawings Schedule	Montagu Evans
Location Plan (@1:1250)	MWA
Existing, Demolition and Proposed Application Drawings (inc. elevations, floor plans, sections).	MWA
Design and Access Statement	MWA
Planning Statement	Montagu Evans
Loss of Employment Report	Montagu Evans
Heritage Statement	Architectural History Practice
Energy & Sustainability Statement	EB7
Internal Daylight Report	CHP Surveyors
Construction Management Plan	Motion
Basement Impact Assessment	Chelmer Site Investigations
Structural Drawings and Methodology	Barrett Maloney
CIL Form	Montagu Evans

- 1.14 This Planning Statement demonstrates that the Scheme would:
- Successfully deliver sustainable development of brownfield land within London, in line with the overarching approach to development outlined in the NPPF;

- Deliver a development that would contribute positively to the delivery of the vision for Camden and its strategic objectives;
- Apply a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the building;
- Deliver a design of high quality architecture that would be well-related to the surrounding context and enhance the character and appearance of the conservation area and the building itself;
- Allow the development of four high quality residential units, consistent with the strategic objectives of all tiers of planning policy, promoting residential development within accessible locations;
- Provides an opportunity to maximise the residential potential for the site, increasing the number of units from two, within the 2017 Permission, to four residential units; and
- Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development which promotes sustainable means of travel such as cycling and walking.

1.15 **Section 2** of this Statement provides background information on the Site including its planning history. **Section 3** sets out details of the Proposed Scheme. **Section 4** summarises the planning policy relevant to the Site, and the proposals are assessed against these policies in **Section 5**. Summary and conclusions are contained within **Section 6**.

2.0 SITE LOCATION AND PLANNING HISTORY

Application Site

- 2.1 The Site is situated within the administrative area of the London Borough of Camden (LBC) and comprises a site area of approximately 0.0144 ha (144 sqm). A site location plan is enclosed with the application submission.
- 2.2 The Site is located within Central London, on the eastern side of John's Mews and comprises two interlinked two storey properties (nos. 13 and 15), arranged over ground and first floor levels. Both properties are traditional mews buildings with rendered front facades. The building is currently vacant, although was previously used as a garage, workshop and offices.
- 2.3 The mews were originally constructed in the 1800s to serve the houses on John Street, which are situated to the east. However, the existing building on the Site was built post-war. The majority of this area was badly damaged by Second World War bombs.
- 2.4 The existing building occupies the entirety of the plot, which is rectangular in nature. The building directly fronts the street (John's Mews) and is mid-terrace, therefore being flanked on both sides by other mews buildings.
- 2.5 The building is currently vacant and largely derelict, internally. It previously provided a workshop at ground floor level with garage space to park two cars. The rear of the ground floor provides ancillary kitchen and bathroom/toilets, with the first floor providing office space across both buildings. There is currently no access to the first floor level, as the building has been largely stripped out, including the staircases.
- 2.6 The building does not benefit from floors, stairs, ceiling or any services including lighting, heating or any form of sanitation. There is a significant hole in the first floor of no. 13, while the roof across both properties is not watertight or insulated.
- 2.7 The existing building is not listed, but it is located within the Bloomsbury Conservation Area. The buildings are listed within the Appraisal and Strategy document for the conservation area as being a positive contributor (page 143). It is located within the *Great James Street / Bedford Row* sub-area.
- 2.8 The pre-application advice letter dated 19 December 2016 states that:

"...there is some conflict with the townscape maps which do not list them as making a positive contribution. Further examination of the facades reveals that they have been altered in the past with replacement windows and doors and a rendered façade, however, their modest appearance and relationship with neighbouring buildings mean they do contribute to the area, although in a limited way."

2.9 There is a total of 221.3 sqm (GIA) of existing floorspace on the Site.

Surrounding Area

2.10 The Site is situated on a typical mews street, which is surrounded by a range of uses, including both residential and non-residential. It is noted that there have been a large number of planning permissions granted along John's Mews and other mews in the area for the conversion or redevelopment of buildings to residential use.

2.11 The Bloomsbury Conservation Area Appraisal and Strategy refers to John's Mews as having a greater number of recent interventions, although its fundamental character is retained. This is similar to many of the Mews in the surrounding area, where most of the buildings have been rebuilt as modern apartment buildings or single dwellinghouses.

2.12 Adjoining the Site:

- North is 11 John's Mews, which is a three storey building, providing a single family dwellinghouse of three bedroom;
- East is the rear parts of the properties situated along John Street. The street provides a variety of residential and commercial offices, in four to five storey buildings, which are Grade II listed. Single or double storey rear extensions back on to the rear of the mews buildings;
- South by 17 John's Mews, another three storey residential building, which is understood to be a single family dwellinghouse;
- West by John's Mews, opposite which is the Saint George the Martyr Church of England Primary School.

2.13 The surrounding area therefore comprises mainly residential uses, with small scale business uses (and a school), commonly found within Central London.

2.14 As noted above, the site is located within the Bloomsbury Conservation Area. Nos. 22 – 28 John Street, to the east of the Site are Grade II listed (grouped). The adjacent properties (nos. 11 and 17 John's Mews) are also identified as being positive contributors to the conservation area.

2.15 A more detailed description of the Site and surrounding area is provided in the Design and Access Statement prepared by MWA.

Accessibility

2.16 The Site has a Public Transport Accessibility of 6a which is categorised as 'excellent, as it is within Central London, and therefore located within walking distance to numerous public transport nodes.

Rail Accessibility

- 2.17 The nearest London Underground station is Russel Square, located approximately 720m to the south (approximately 8-9 minutes walking time) providing services on the Piccadilly line.
- 2.18 The Site is also close to Chancery Lane Underground station (921 to the south) on the Central line and to Holborn Underground station (790m) on both the Piccadilly and Central lines.

Bus Accessibility

- 2.19 The Site is highly accessible to London's bus network. The nearest bus stop is situated 350m from the site, at Holborn Police Station, and serves four different routes. A further bus stop providing access to another three bus routes is located on Gray's Inn Road / Guilford Street, less than 400m from the Site.

Site and Planning History

- 2.20 The following section provides a review of the planning history associated with the Site. Most importantly, the Site benefits from an extant planning permission, granted on 31 May 2017, for the conversion of the building to residential.
- 2.21 On 1 February 1990, planning permission was granted (ref. 8970066) for the demolition of 11 – 15 John's Mews and its reconstruction with an additional mansard storey to provide additional office floorspace.
- 2.22 In more recent history, planning permission was granted on 5 March 2014 (ref. 2013/4967/P) for the following development:

“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.”

- 2.23 We understand that the permission was not implemented.
- 2.24 Following the grant of planning permission in 2014, the previous owner submitted a second planning application in May 2014 (ref. 2014/3330/P). The description of development is as follows:

“Change of use from garage/workshop/offices (Class B1) to residential use (Class C3) to provide 2 dwellinghouses, including excavation works to create a new basement floor level, creation of 2 new courtyards, mansard roof extensions and elevational alterations to front and rear.”

- 2.25 The May 2014 Application which also sought the conversion of the building to residential, proposed the excavation of a basement level for additional residential floorspace.
- 2.26 The permitted development comprised a total of 389.4 sqm.
- 2.27 Following an extensive period of assessment in relation to basement impact, and the submission of additional information, the application was resolved to grant at planning committee on 29 September 2016, subject to the signing of a Section 106 Agreement.
- 2.28 The Section 106 Agreement was subsequently signed on 31 May 2017, with the decision notice issued on the same date. The permission would therefore expire on 31 May 2020.

3.0 DEVELOPMENT PROPOSALS

3.1 As set out in **Section 1** of this Statement, the Application proposes the following development:

- Change of use of vacant office / garage (Class B1) to residential (Class C3) to provide 4 x 2 bed flats;
- Proposed mansard roof extension to create residential accommodation at second floor level;
- Excavation of basement level below footprint of the property;
- Proposed lightwell to rear to provide natural ventilation and daylight to serve accommodation at basement level; and
- Proposed refuse store at ground floor level.

3.2 The Proposed Scheme involves the retention of the structure of the existing building, with minor demolition, internal demolition and removal of windows and doors.

3.3 During the pre-application stage, a number of comments were made by LBC and subsequent amendments were made to the design of the development, which are identified within the Design and Access Statement. These can be summarised as follows:

- Reduction in glazing at No. 13 to increase privacy for ground floor unit;
- Reconfiguration of lower ground floor accommodation, and addition of roof lights to increase outlook, ventilation and light;
- Ground floor rear façade set further back from rear wall to increase level of outlook and are now dual aspect;
- Omission of lower ground floor terrace and replacement with limited access planter; and
- Materiality of front elevation revised to retain similar palette to existing.

3.4 The existing building comprises 221.3 sqm of floorspace (GIA).

Residential Accommodation

3.5 The Scheme proposes a total of four residential units, to be located across all floors (lower ground through to second floor).

3.6 All units would be provided as two bedroom units. Two of the units are duplex units at ground and basement level with two lateral apartments at first and second floors respectively. All four units provide dual aspect accommodation, as the layout of the apartments stretch from the front to the rear of the Site.

3.7 Each of the four units exceed the minimum space standards for two bedroom units, ranging from 76 sqm to 100 sqm. The proposed apartments would provide spacious and high quality dwellings for future occupants.

- 3.8 Two of the proposed units at have private amenity space, in the form of terraces, located to the rear of the building at lower ground floor level.
- 3.9 All of the units proposed are designed to meet the relevant criteria of Part M of Building Regulations, as detailed within the Design and Access Statement.
- 3.10 The Proposed Development comprises 390.9 sqm (GIA), an increase of 169.6 sqm (GIA) over the existing building. This is a similar sized development to the May 2017 permitted scheme which comprised 389.4 sqm.

Parking, Access and Storage

- 3.11 The main access to the Proposed Development would be via an entrance on John's Mews, leading into a communal entrance foyer. The 'front doors' of two of the units are at ground level, with the remaining two units on the upper levels.
- 3.12 The Proposed Scheme provides waste and recycling facilities in line with the current requirements. A communal bin store is located within the building at ground floor level, with access for collection from the street. The strategy for waste storage and collection is detailed within the Design and Access Statement. Facilities have been provided in each of the apartments for storage, before being moved to the communal storage for collection.
- 3.13 The Site is located in an area of excellent public transport accessibility and a 'car free' development is appropriate.
- 3.14 The Proposed Development proposes a total of eight cycle spaces. This is in the form of two Brompton foldable bikes for compact storage within each dwelling. These will be safe and secure and the bikes will be provided for the residents.
- 3.15 The existing building currently provides no dedicated cycle storage. This provision would therefore improve the current facilities and further promote sustainable travel.

4.0 PLANNING POLICY FRAMEWORK

4.1 This Application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context, and **Section 5.0** provides an assessment of the Application against the policies and guidance contained within these documents.

National Guidance

4.2 The National Planning Policy Framework (the "NPPF") was published on 27 March 2012 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements. The NPPF sets out the Government's approach to planning matters, and is a material consideration in the determination of planning applications.

4.3 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a 'golden thread' running through decision-taking (paragraph14). This paragraph goes onto state that:

"For decision taking this means:

- *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:*
 - *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*
 - *specific policies in this Framework indicate development should be restricted."*

4.4 In March 2014, the Government published the National Planning Practice Guidance (NPPG) which is a material consideration in relation to planning applications. The NPPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level.

Statutory Framework

4.5 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.

4.6 The Statutory Development Plan for the Site comprises:

- London Plan (consolidated with Alterations since 2011) (2016); and
- LB Camden Local Plan (July 2017).

Emerging Policy

London Plan Alterations

- 4.7 The current plan was produced in 2011 and has been subject to numerous 'Alterations', most recently in 2016. These alterations have refined policy on housing and parking standards, but not revised the strategic objectives of the plan.
- 4.8 In May 2016, Sadiq Khan was elected as Mayor of London and has the power to expedite a review of the London Plan. However, this is a complex process and in setting a timetable, the Mayor will need to consider the timing implications of undertaking a full reassessment of the London Strategic Housing Land Availability Assessment (LHLAA), the extended period for consultation and examination and the time it takes to undertake a full review.
- 4.9 In reality, it takes approximately three years for a new London Plan to be created. It is therefore likely that in the short term, the Mayor will implement revisions to the adopted Supplementary Planning Documents (listed below) before the London Plan is updated in the long term.

Regional Guidance

- 4.10 The Greater London Authority (GLA) has published a number of supporting documents that are relevant in the consideration of this Application. Of particular relevance are:
- SPG: Draft Affordable Housing & Viability (November 2016);
 - SPG: Crossrail Funding (March 2016);
 - SPG: Housing (March 2016);
 - SPG: Central Activities Zone (March 2016);
 - SPG: Accessible London: Achieving an Inclusive Environment (October 2014);
 - SPG: The Control of Dust and Emissions During Construction and Demolition (July 2014);
 - SPG: Shaping Neighbourhoods: Character and Context (June 2014);
 - SPG: London Planning Statement (May 2014);
 - SPG: Sustainable Design and Construction (April 2014);
 - SPG: Land For Industry and Transport (September 2012); and
 - SPG: Planning for Equality and Diversity in London (October 2007).

Local Guidance

- 4.11 Ealing has a number of adopted supplementary planning documents (SPDs) and other documents which are a material consideration in respect of the Application, including:
- CPG1: Design;
 - CPG2: Housing;

- CPG3: Sustainability;
- CPG4: Basements and lightwells;
- CPG5: Town centres, retail and employment;
- CPG6: Amenity;
- CPG7: Transport; and
- CPG8: Planning obligations.

4.12 LBC are currently undertaking a review of the CPGs to ensure that they reflect the new updated policies within the Camden Local Plan. An initial round of consultation is running through 2017 on the general structure and content of the documents.

4.13 Further rounds of consultation will then be undertaken on specific matters, starting with Sustainability, Basements, Town Centres, Amenity and parts of Housing. A second phase of consultation will then cover the Design, Transport, Planning Obligations and other parts of Housing.

Site Specific Designations

4.14 The Camden Planning Policy Map identifies that the Site is within:

- Bloomsbury Conservation Area;
- Central London Area; and
- Designated View 6A.1 – Blackheath Point to St Paul's Cathedral – Right Lateral Assessment Area.

4.15 As previously noted, the Site is not listed but is identified as a positive contributor to the conservation area.

5.0 PLANNING POLICY ASSESSMENT

5.1 Within the section, we assess the component parts of the proposed development against the statutory development plan and other material considerations as outlined in **Section 4**.

Loss of Employment Floorspace

5.2 Local Plan Policy E1 (Economic development) seeks to support Camden's industries by safeguarding existing employment sites and premises in the borough that meet the needs of industry and employment.

5.3 Local Plan Policy E2 (Employment premises and sites) seeks to 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 Central Activities Zone (CAZ) or the local economy.

5.4 Policy E2 states that the development of business premises and sites for a non-business use will be resisted, 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.*

5.5 Paragraph 5.38 of the Local Plan goes on to state:

"When assessing proposals that involve the loss of a business use to a non-business use we will consider whether there is potential for that use to continue. We will take into account various factors including:

- *the suitability of the location for any business use;*
 - *whether the premises are in a reasonable condition to allow the use to continue;*
 - *the range of unit sizes it provides, particularly suitability for small businesses; and*
- whether the business use is well related to nearby land uses."*

5.6 Paragraph 5.40 of Local Plan states:

"In addition to the considerations above, where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use. The applicant must submit evidence of a thorough marketing

exercise, sustained over at least two years. The premises should be marketed at realistic prices, include a consideration of alternative business uses and layouts and marketing strategies, including management of the space by specialist third party providers.”

- 5.7 Camden Planning Guidance 5 (Town Centres, Retail and Employment) provides further guidance to support the above policies.
- 5.8 In addition to the above, an extant planning permission exists (the 2017 Permission), which successfully demonstrated that that the building was no longer suitable for its existing business use, in line with the previous development plan policies. The loss of Class B1 was considered to have been justified and a “fall back” position for residential use, already exists.
- 5.9 A separate report assessing the Loss of Employment floorspace has been prepared and forms part of this Application. The report is supported by commentary from marketing agents, Farebrother, redevelopment costs from Ron Coll Associates and details of the availability within the surrounding area.
- 5.10 The report concludes that the building is no longer suitable for occupation for its existing use, as per Part a) of Policy E2.
- 5.11 As noted in **Section 3**, the building does not benefit from floors, stairs, ceiling or any services including lighting, heating or any form of sanitation. There is a significant hole in the first floor of no. 13, while the roof across both properties is not watertight or insulated. The building does not currently meet the regulatory requirements of Fire Regulations, Workplace Legislation, Building Regulations or Access and Equality legislation.
- 5.12 The property is not in a lettable condition and requires redevelopment in order to bring it to the market. It is not currently possible to market the property in its current state.
- 5.13 Although the Site benefits from a permission which allows the change of use of the building to residential (which can be implemented until June 2020), which is a significant weight in determining the Application, the Loss of Employment Report continues to assess the proposals against the development plan policy, E2 and the supporting Camden Planning Guidance.
- 5.14 The assessment concludes the property would require significant and costly investment to bring it into a lettable condition, which it achieved would not reflect market demand and would place the building at a competitive disadvantage. The building is not suitable for B Class uses and it is not feasible to pursue the redevelopment of the site for such uses.
- 5.15 Overall, the release of this building for an alternative use will not prejudice the aims and objectives of Camden’s employment policies and, in this case, it is not necessary to

demonstrate the long term vacancy of the premises through marketing. In light of the above exercise and the extant planning permission the conversion of this vacant commercial building to another use is considered to be acceptable.

Residential Development

- 5.16 The Proposed Residential development accords with the current thrust of planning policy at national, regional and local level, which places an emphasis on achieving sustainable development. In particular, adopted plan policy is extremely clear that housing is a priority land use in Camden.
- 5.17 Housing delivery is also one of the core NPPF objectives and it advocates policy that seeks to significantly boost the supply of housing (paragraph 47). Furthermore, the NPPF states that *“housing applications should be considered in the context of the presumption in favour of sustainable development”*.
- 5.18 Paragraph 47 of the NPPF also requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market.
- 5.19 London Plan Policy 3.3 (Increasing Housing Supply) states that there is a *“pressing need for more homes in London”*. Part D of the policy states that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing targets through the intensification of brownfield housing sites and mixed use redevelopment, including of surplus commercial capacity.
- 5.20 Table 3.1 of the London Plan identifies an annual target of 889 new homes per annum in Camden (8,892 total 2016 to 2025), which reflects an increased target as part of the Further Alterations to the Plan in 2016.
- 5.21 At the local level, Policy H1 (Maximising housing supply) aims to secure a sufficient supply of homes and maximise the supply of housing to exceed the target of 16,800 additional homes between 2015/16 and 2030/31 (including 11,130 additional self-contained homes).
- 5.22 Policy H1 states that self-contained housing is the priority land use of the Local Plan. The policy also states that LBC will resist alternative development of sites already identified through a current planning permission, unless it is shown that it is no longer developable for housing. Furthermore, where sites are underused or vacant, the maximum reasonable provision of housing will be expected.
- 5.23 The Site is located within Central London and LBC supports this area as a focus for Camden’s future growth in homes and other uses.

- 5.24 The principle of prioritising the delivery of housing over other uses and maximising that delivery has long been established as acceptable in Camden.
- 5.25 As noted above, the Site already benefits from an extant planning permission for the conversion of the Site to two residential units. The Proposed Development seeks to increase the capacity of the Site, to provide four apartments.
- 5.26 The provision of four units on Site is considered to fully accord with the aims of the development plan and assists the Council in meeting its targets for housing delivery. The location of residential development in this location, close to other residential uses and with an accessible town centre location is also supported.

Residential Density

- 5.27 London Plan Policy 3.4 (Optimising Housing Potential) seeks to optimise housing density, having regard to local context, design principles and public transport accessibility.
- 5.28 The optimum density ranges are set out within London Plan Table 3.2, known as the 'sustainable residential quality density matrix'. The Site has a Public Transport Accessibility Level of 6a and is in a Central location, within the Central Activities Zone and close to Holborn and the West End. The density matrix sets out that the appropriate range should be between 650-1100 habitable rooms per hectare and 140-405 units per hectare.
- 5.29 The GLA Housing SPG (2016) requires the density of new residential development in accordance with the London Plan.
- 5.30 Policy G1 (Delivery and location of growth) supports development that makes best use of its site and resists development that makes inefficient use of the land.
- 5.31 The Proposed Development provides a total of 4 residential units and 14 habitable rooms on a site which is 0.0144 hectares. Using the table above, the development is calculated to provide 972 habitable rooms per hectare and 278 units per hectare using the GLA's density calculation. This is consistent with the appropriate density set out within the London Plan.
- 5.32 The Proposed Development has been carefully designed to optimise the density of development in line with planning policy objectives, whilst ensuring that it does not represent overbearing or dominating development.
- 5.33 Having regard to the tests of local context, design and public transport accessibility, the proposed density is considered to be wholly appropriate in consideration of the London Plan density matrix.

Housing Mix

- 5.34 National planning policy contained in the NPPF requires new development to deliver sustainable, inclusive and mixed communities in accessible locations. To achieve mixed communities, the NPPF advises that a variety of housing should be provided in terms of size, type, tenure and price and also a mix of different households such as families with children, single person households and older people.
- 5.35 Policy 3.8 (Housing Choice) of the London Plan seeks to ensure that new residential developments comprise a mix of unit sizes to address the housing needs of the local area. The policy does not, however, specify a precise mix of housing types.
- 5.36 Local Plan Policy H7 (Large and small homes) aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.
- 5.37 All housing development should contribute to meeting the priorities set out in the Dwelling Size Priorities Table, which identifies a high priority for two and three bed market units. However, Policy H7 also states that the Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, having regard to a number of considerations.
- 5.38 The Proposed Development provides a four x two bed units. This has been formulated in consideration of the character of the development, the Site size and the viability / demand of certain homes. Overall, this meets the aim of Policy H7 with regard to the provision of two-bed units, and although it does not provide a mix of bedrooms, does provide a mix of sizes of homes which is considered appropriate given the Site's context and design of the development.

Housing Design

- 5.39 London Plan Policy 3.5 (Quality and Design of Housing Developments) states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. The policy adds that the design of new dwellings should take account of "factors relating to 'arrival' at the building and the 'home as a place of retreat', have adequately sized rooms and convenient and efficient room layouts".
- 5.40 The policy also states that LDFs should incorporate minimum space standards that generally conform to Table 3.3 of the London Plan, which is comparative to the Nationally Described Space Standards, introduced by the Government.
- 5.41 Local Plan Policy H6 (Housing choice and mix) seeks to secure high quality accessible homes in all developments that include housing, and will:

a) *"expect all homes to meet the nationally described space standard;*

- b) *require 90% of new-build homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2);*
- c) *require 10% of new-build homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3); and*
- d) *where the full requirements of Building Regulation M4(2) and M4(3) cannot be secured, seek design of 10% of homes in each development to meet M4(3) requirements as far as possible, and for any homes in the development that are not broadly consistent with M4(3), seek design to meet M4(2) requirements as far as possible."*

- 5.42 The accommodation schedule showing the size of each unit is outlined in the Design and Access Statement, in accordance with the NDSS and London Plan.
- 5.43 Each unit exceeds the minimum space standards for two bedroom units, ranging from 76.4 sqm up to 100.4 sqm, and is therefore compliant in this regard.
- 5.44 The Design and Access Statement shows that all four units have been designed to meet as many of the Part M criteria as possible. Level approach is given to all entrances, including the external entrance, which is to be illuminated and have clear opening and widths. The communal stairs are accessible and internal doorways and hallways enable convenient movement. Internal rooms, such as bedrooms and bathrooms allow easy circulation and access to facilities.
- 5.45 The Site is restricted and it is therefore not possible to meet all of the requirements. For example, no car parking spaces are provided as part of the development (although this is in line with Camden's policy for 'car free' development) and no lift is provided due to site constraints.
- 5.46 Additionally, the Mayor's Housing SPG (2016) sets out a requirement for a minimum of 5 sqm of private outdoor space that should be provided for 1 – 2 person dwellings and an additional 1 sqm for each additional occupant (Standard 4.10.1).
- 5.47 Due to the constraints of the Site, it is not possible for each individual flat to have benefit from individual private amenity space. The Scheme does propose rear terraced areas for two of the flats at lower ground floor level. This is not uncommon on a dense urban site, where buildings front the street line.

Affordable Housing

- 5.48 Paragraph 50 of the NPPF states that local planning authorities should, where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities.

5.49 Policy 3.11 in the London Plan requires Boroughs to set an affordable housing target having regard to housing need assessments and a realistic assessment of supply.

5.50 Policy 3.12 in the London Plan emphasises that a range of factors must be considered when assessing the level of affordable housing on a particular proposal. It states that:

“A) the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:

- a) current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8 and 3.10 and 3.11*
- b) affordable housing targets adopted in line with Policy 3.11*
- c) c) the need to encourage rather than restrain residential development (Policy 3.3)*
- d) d) the need to promote mixed and balanced communities (Policy 3.9)*
- e) the size and type of affordable housing needed in particular locations*
- f) the specific circumstances of an individual site.”*

5.51 Local Plan Policy H4 (Maximising the supply of affordable housing) seeks to provide 5,565 additional affordable homes from 2015 to 2030 and aims for an appropriate mix of affordable housing types. LBC expects a contribution to affordable housing from all developments that include housing and provide one or more additional home.

5.52 The guideline mix, as set out in Policy H4 is 60% social-affordable rented housing and 40% intermediate housing and targets are based on an assessment of development capacity whereby 100 sqm (GIA) of housing is generally considered to create capacity for one home. The Policy identifies:

- “a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity;*
- an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings;*
- Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;”*

5.53 The proposed development provides four residential units at 390.9 sqm (GIA), and therefore has a capacity for four homes based on the calculation set out in Policy H4. A payment-in-lieu of affordable housing is therefore acceptable on this Site and no affordable housing is provided on site.

Design Principles

- 5.54 High quality and inclusive design is encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development, and should contribute positively to making places better for people. Part 7 of the NPPF outlines the requirement for good design and sets out that development should:
- *“Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - *Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
 - *Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
 - *Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
 - *Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
 - *Are visually attractive as a result of good architecture and appropriate landscaping.”*
- 5.55 Chapter 7 of the London Plan sets out the Mayor’s policies on a number of issues relating to London’s places and spaces. Policy 7.2 (An Inclusive Environment) requires all new development in London to achieve the highest standards of accessible and inclusive design, while 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 buildings”. Part D of Policy 7.6 (Architecture) states that buildings and structures should “not cause unacceptable harm to the amenity of surrounding land and buildings”.
- 5.56 LBC’s Local Plan Policy D1 (Design) seeks to secure high quality design in development and requires development to:
- a. *“respects local context and character;*
 - b. *preserves or enhances the historic environment and heritage assets...;*
 - 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,*
- l. incorporates outdoor amenity space;*
- m. preserves significant and protected views;*
- n. for housing, provides a high standard of accommodation; and*
- o. carefully integrates building services equipment.”*

5.57 The GLA has also published Supplementary Guidance to the London Plan. SPG: Achieving an Inclusive Environment provides detailed advice and guidance on providing inclusive design in London.

5.58 Local Plan Policy C5 (Safety and security) requires developments in Bloomsbury to demonstrate that they have incorporated design principles which contribute to community safety and security.

5.59 Local Plan Policy C6 (Access for all) seeks to promote fair access and expects all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely and easily and with dignity by all. The Council seeks to ensure that development meets the principles of lifetime neighbourhoods.

5.60 As noted in **Section 5**, a number of design changes were made as a result of comments received during the pre-application stage, including:

- Reduction in glazing at No. 13 to increase privacy for ground floor unit;
- Reconfiguration of lower ground floor accommodation, and addition of roof lights to increase outlook, ventilation and light;
- Ground floor rear façade set further back from rear wall to increase level of outlook and are now dual aspect;
- Omission of lower ground floor terrace and replacement with limited access planter; and
- Materiality of front elevation revised to retain similar palette to existing.

5.61 The Proposed Development splits the front elevation vertically, which is in keeping with the grain of the street and the historic legacy of the Site as two distinct mews buildings. Large coach style doors are to be reinstated at ground floor level of the front elevation. This creates a formal street frontage, similar to adjacent properties on the mews and retaining the character of the existing building. The proposed mansard roof extension allows the creation of residential accommodation at second floor level and is completed by traditionally detailed dormers.

- 5.62 We note that the proposed building is a similar size to that which was permitted in May 2017. The increase between the two schemes is one square metre.
- 5.63 A comprehensive Design and Access Statement prepared by MWA is submitted as part of the Application. This document sets out in detail an evaluation of the Scheme's design and the manner in which this has progressed as a result of the consultation undertaken.

Heritage Considerations

- 5.64 Paragraph 128 of the NPPF states that:

"In determining applications, local planning authorities 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."

- 5.65 The existing building is not listed, but is located within the Bloomsbury Conservation Area and is within the setting of a number of listed buildings adjacent to the Site on John Street. It is not identified in the Bloomsbury Conservation Area (BCA) Sub Area 10 Map, as a positive contributor to the conservation area, under the BCA Appraisal and Management Strategy (adopted 18 April 2011). However, it is listed on page 143 of the document as a 'positive contributor'.
- 5.66 NPPF Paragraph 132 notes that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be
- 5.67 London Plan Policy 7.8 states that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 5.68 Local Plan Policy D2 (Heritage) aims to preserve and, where appropriate, enhance the rich and diverse heritage assets and their settings.
- 5.69 The Policy states that in order to maintain the character of Camden's conservation areas, the Council will require development to preserve or enhance its character or appearance. It will resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance.
- 5.70 Development will be resisted if it would cause harm to the significance of a listed building through an effect on its setting.

- 5.71 LBC also seeks to protect other heritage assets including non-designated heritage assets (including those on and off the local list). The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.
- 5.72 A Heritage Statement has been prepared by the Architectural History Practice (AHP) which provides a statement of significance and assesses the impact of the proposed development on heritage assets.
- 5.73 AHP identifies that the buildings have little evidential value, some historical value (because of the scale of the fronts), little aesthetic and no communal value. Adjacent buildings have retained fronts of the original height, although have modern roof additions, similar to that which is proposed under this Application.
- 5.74 It concludes that the basement excavation will have no impact on the heritage value of the buildings and that alterations to the buildings will preserve the fronts of both properties, which although it has been altered and modernised in previous years, is recognised as a contribution to the Conservation Area, as identified within the Appraisal. Overall, the proposed development would have no adverse effect on the appearance of the buildings and the character of the conservation area will be preserved.

Residential Amenity

- 5.75 At the local level, Camden Local Plan Policy A1 (Managing the impact of the development) seeks to protect the quality of life of occupiers and neighbours and will grant planning permission for development unless this causes unacceptable harm to amenity. The Policy states that LBC 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.”*
- 5.76 The factors considered as part of the Policy include:
- e) visual privacy, outlook;
 - f) sunlight, daylight and overshadowing;
 - g) artificial lighting levels;
 - h) transport impacts;

- i) impacts of the construction phase
- j) noise and vibration levels;
- k) odour, fumes and dust;
- l) microclimate;
- m) contaminated land; and
- n) impact upon water and wastewater infrastructure

5.77 The proposed conversion and development of the building to a residential block is unlikely to lead to an adverse impact on neighbouring amenity, such as noise or daylight and sunlight. The proposed development is of a similar bulk and design to the extant permission, which the Council concluded did not affect neighbouring amenity.

5.78 The pre-application letter, dated 19 December 2017 states that:

“whilst the terminating height would be increased as a result of the mansard addition, given its proximity to buildings along Johns Street, in addition to its potential terminating height matching those either side of the application site, this element would not exert a materially harmful impact on the amenities of adjoining occupiers, in terms of outlook, daylight and sunlight.”

5.79 It is acknowledged that overlooking between John's Mews and John Street may be possible, however, this is similar to the existing situation and not uncommon in this dense urban environment.

5.80 An Internal Daylight Report has been prepared by CHP Surveyors which assesses the internal daylight levels within the proposed lower ground floor accommodation. The report concludes that the proposals achieve the BRE Guidelines and provide accommodation with good access to daylight. The proposed bedrooms at this level exceed the recommended minimum Average Daylight Factor (ADF).

Transport

5.81 Section 4 of the NPPF sets out the Government's policies with regard to transport. Para. 32 sets out the requirement for all developments that generate significant amounts of movement to be supported by a Transport Statement. It is also stated (para. 34) that:

“plans and decisions should ensure developments that generate significant movements are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised”.

5.82 Chapter 6 of the London Plan provides the regional guidance for transport. Policy 6.1 (Strategic Approach) seeks to encourage the “*closer integration of transport and development*”, while supporting “*development that generates high levels of trips at locations with high public transport accessibility and/or capacity*”.

- 5.83 Policy 6.10 aims to bring about a significant increase in walking, by improving the quality of the pedestrian and street environment.
- 5.84 At the local level, Local Plan Policy T1 (Prioritising walking, cycling and public transport) is the primary transport policy which promotes sustainable transport in the borough. The policy seeks to ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links.
- 5.85 Overall, the Proposed Development is unlikely to have an impact on the transport network given the relatively small change in trip generation. The development is considered to be fully in accordance with the policy at national, regional and local level.

Car Parking

- 5.86 The NPPF requires Local Authorities to consider parking provision within new developments, based upon the accessibility of the development and the opportunities for public transport, whilst recognising that there is a need to reduce the use of high emissions vehicles.
- 5.87 Policy 6.13 (Parking) of the London Plan aims to achieve an appropriate balance between promoting new development and preventing excessive car parking provision.
- 5.88 Local Plan Policy T2 (Parking and car-free development) limits the availability of parking and requires all new development in the borough to be car-free.
- 5.89 The Policy also states that on-site parking permits in connection with new developments will not be issued to future residents. On-site parking will be limited to spaces designated for disabled people or essential operational or servicing needs.
- 5.90 The application Site has a Public Transport Accessibility Level of 6a which is considered to be excellent. The Site is within walking distance of a number of public transport services, including bus routes and the London Underground. No car parking is provided on site, and a car-free development is therefore acceptable given the Site's excellent accessibility and Camden's planning policy.

Cycle Parking

- 5.91 Both the NPPF and the London Plan promote cycling in locations which can be made sustainable.
- 5.92 London Plan Policy 6.9 encourages new development to contribute to the increase of cycling through the provision of cycling parking facilities. The cycling parking requirements seek 2 spaces per all other dwellings. In addition to the above, there should be 1 space per 40 units for visitors.

5.93 In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development:

- provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within CPG7: Transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development;
- makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.

5.94 The Proposed Development provides a total of 8 cycle parking spaces, which equates to 2 per unit. These are provided in line with the latest London Plan standards, and are provided internally within the residential units. Due to the constraints of the existing building and the conversion of this to form residential accommodation, it is difficult to provide dedicated cycle storage for full-sized bicycles within each flat. It is therefore proposed to supply each flat with two x Brompton bicycles which are to be stored within the joinery of the flat.

5.95 Necessary short-term cycle parking is proposed to be agreed with LB Camden during the determination of the planning application and secured by planning condition. Alternatively, visitors can make use of public cycle parking spaces in the vicinity of the Site.

Energy and Sustainability

5.96 The NPPF seeks to ensure the delivery of renewable or low carbon energy developments in order to address Climate Change and achieve environmental sustainability through improving biodiversity and minimising waste.

5.97 London Plan Policy 5.2 (Minimising Carbon Dioxide Emissions) states that development proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the 'be lean, be clean, be green' energy hierarchy. It seeks for residential development to be zero carbon from 2016 to 2031. However, these targets primarily apply for major developments and therefore are not necessarily relevant in the context of this application.

5.98 At the local level, Camden Local Plan Policy CC1 (Climate change mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and operation.

5.99 LBC promotes zero carbon development in accordance with the London Plan, requiring all development to reduce carbon dioxide emissions through following the steps of the energy hierarchy.

5.100 Local Plan Policy CC2 (Adapting to climate change) requires development to be resilient to climate change and adopt appropriate adaptation 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.”*

5.101 In light of the above, we note that the pre-application advice letter dated 19 December 2016 states:

- “New residential development will be required to demonstrate that it is capable of achieving a maximum internal water use of 105 litres per person/day, with an additional 5 litres person/day for external water use.”
- “The Council will continue to apply policies which require compliance with energy performance standards until the Planning and Energy Act 2008 has been amended. “
- “New residential dwellings will be required to demonstrate 20% reduction below Part L Building Regulations 2013.”

5.102 An Energy and Sustainability Document has been prepared by EB7 as part of the Application Submission. The report provides the baseline energy requirements for the proposed development and identifies the reduction in energy demand as a result of energy efficiency measures.

5.103 The results of the assessment show that following the introduction of passive energy efficiency measures into the development, the total amount of CO2 emissions (including unregulated energy use) would be reduced by 15.15%. Excluding the unregulated use, the reduction equates to 22.44%.

5.104 Energy efficiency measures which have been included within the design and specification of the building include glazing, ventilation, high efficiency boilers, temperature control, lighting and insulation measures to prevent heat loss.

5.105 The Site is currently completely impermeable, with hard landscaping and building. The design will ensure that the peak rate of surface runoff is no worse than the existing rate. Elements of green roof are incorporated to further aid the attenuation of surface water run-off, as well as enhancing site ecology.

- 5.106 The development seeks to minimise water use by incorporating water efficiency and water recycling measures to ensure that dwellings meet the required level of 105 litres maximum daily allowable usage per person. The basement level dwelling will have rainwater harvesting. A sample internal water use calculation for a two bed flat is provided within the appendices of the Energy and Sustainability Statement.

Subterranean Works and Construction

- 5.107 Local Plan Policy A5 (Basements) states that basement development will only be permitted where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a) *“neighbouring properties;*
- b) *the structural, ground, or water conditions of the area;*
- c) *the character and amenity of the area;*
- d) *the architectural character of the building; and*
- e) *the significance of heritage assets.”*

- 5.108 The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:

- f) *“not comprise of more than one storey;*
- g) *not be built under an existing basement;*
- h) *not exceed 50% of each garden within the property;*
- i) *be less than 1.5 times the footprint of the host building in area;*
- j) *extend into the garden no further than 50% of the depth of the host building measured from the principal rear elevation;*
- k) *not extend into or underneath the garden further than 50% of the depth of the garden;*
- l) *be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and*
- m) *avoid the loss of garden space or trees of townscape or amenity value.”*

- 5.109 Extensive guidance is provided in Camden Planning Guidance 4 (CPG4) on Basements and Lightwells which was produced in July 2015.

- 5.110 The Proposed Development, which includes a single level basement, meets the criteria identified in Policy A5, above. It is noted that a basement has already been consented within the 2017 Permission and therefore the principle of developing a basement has already been established.

- 5.111 In determining proposals for basements, LBC requires an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.

- 5.112 Chelmer Site Investigations has produced a Basement Impact Assessment which forms part of this Application and is in accordance with LBC's requirements and policies on this matter.
- 5.113 Appendix A of the report provides a screening exercise in accordance with Camden's Planning Guidance, which identifies the key issues. Chelmer has then undertaken a scoping exercise, which reviews the potential impacts of the basement development and identified the required actions to be undertaken, including ground investigations.
- 5.114 Section 7.9 – 7.19 of the BIA provides a summary of the Impact Assessment undertaken, including considerations of groundwater and hydrological impacts and ground movement analysis. The report makes a number of recommendations for the construction of the basement.
- 5.115 We understand that Camden will use its independent consultants to assess the Basement Impact Assessment, and the project team will provide further information, as necessary, if requested by LBC.

Construction Management Plan

- 5.116 In accordance with adopted plan policy and Camden Planning Guidance, the Construction Management Plan Pro Forma has been drafted and submitted with this application by Motion UK. This demonstrates how construction impacts will be minimised, in relation to site activity during works and the transport arrangements for vehicles servicing the Site.
- 5.117 We note that this draft document will be progressed to a final version should planning permission be permitted. As is usual in Camden, this is likely to be the requirement of clause in the Section 106 legal agreement.

Refuse and Recycling

- 5.118 Camden Local Plan Policy CC5 (Waste) seeks to make Camden a low waste borough and aims to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031. The policy also seeks to make sure that developments include facilities for the storage and collection of waste and recycling.
- 5.119 The Proposed Development encourages the reduction of waste and promotes recycling within dwellings. Each apartment is proposed to be fitted with an 85L separate waste and recycling container within the kitchen unit.
- 5.120 In addition to the integrated storage within kitchen units, the Development provides 480L of communal waste storage (2 x 240L bins) and 220L of communal recyclable storage (4 x 55L green boxes). This is located at ground floor level within the communal

entrance. It is proposed for occupants to bring their waste from the dwellings to the communal bin store to be collected.

Community Infrastructure Levy

- 5.121 Within this assessment, consideration is given to the Mayoral CIL requirements which came into effect on 1 April 2012. The rate for LB Camden is set at £50 per sqm for all development types.
- 5.122 We note that the Mayor is currently undertaking a review of the Mayoral CIL charging schedule and consulting on an increase to the rate for all London Boroughs. For LBC, there is a proposed increase to £80 per sqm. Higher rates are proposed in Central London for office, retail and hotel use.
- 5.123 In addition to the above, LB Camden adopted its Community Infrastructure Charging Schedule in March 2015 which has applied since 1 April 2015. This outlines a rate of £500 per sqm rate for residential developments (Class C3) in the Central area ('Zone A') of the Borough, if less than 10 dwellings (or 1,000 sqm) are proposed.
- 5.124 A CIL Form has been submitted which outlines the relevant information for the Scheme.

6.0 CONCLUSIONS

- 6.1 The Proposed Development seeks the conversion of the existing building to provide four residential apartments.
- 6.2 The Planning Statement has assessed the proposals against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act.
- 6.3 The Scheme has been formulated in accordance with the NPPF, the adopted London Plan, the LBC Local Plan.
- 6.4 The Proposed Development is considered to accord with the relevant policies of the adopted and emerging development plan, as well as being consistent with national planning policy.
- 6.5 The Scheme has been developed as part of pre-application discussions with LB Camden and, as a result, scheme changes have been incorporated to respond to comments received.
- 6.6 The Site benefits from an extant planning permission granted on 31 May 2017 for two residential units. The Proposed Development seeks to intensify the residential use of the Site and maximise its residential potential, which is a key priority at all tiers of planning policy.
- 6.7 Having regard to the assessment undertaken within this Statement, we consider the planning benefits arising from this scheme can be summarised as follows:
- Successfully deliver sustainable development of brownfield land within London, in line with the overarching approach to development outlined in the NPPF;
 - Deliver a development that would contribute positively to the delivery of the vision for Camden and its strategic objectives.
 - Seek to apply a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the building;
 - Deliver a design of high quality architecture that would be well-related to the surrounding context and enhance the character and appearance of the conservation area and the building itself.
 - Allow the development of four high quality residential units, consistent with the strategic objectives of all tiers of planning policy, promoting residential development within accessible locations;

- Provides an opportunity to maximise the residential potential for the site, increasing the number of units from two, within the 2017 Permission, to four residential units.
- Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development which promotes sustainable means of travel such as cycling and walking.

6.8 In light of the above, we respectfully request that LBC grants relevant demolition and planning permission for these Proposals.