# **10-11 Kings Mews** Planning Statement

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Indigo

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Aldermary House 10-15 Queen Street London EC4N 1TX

**T** 020 3949 2500 E info@indigoplanning.com W indigoplanning.com

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# 1. Executive summary

- 1.1. The proposed scheme seeks consent for 4 x 1 bed and 3 x 2 bed private dwellings. The development will provide an appropriate mix of residential housing on a vacant brownfield site in a sustainable location in area where there is a significant housing shortage.
- 1.2. The proposal will provide a high quality well designed building that will protect the amenity of surrounding occupiers, as demonstrated in the accompanying reports to this application.
- 1.3. The principle of residential development and the scale, bulk and massing on the site has already been established under permission 2012/6315/P.

### 2. Introduction

- 2.1. This planning statement has been prepared on behalf of Barhos Development Ltd, in support of a planning application for the development of seven dwellings at 10-11 Kings Mews, London, WC1N.
- 2.2. The proposed scheme seeks consent for 4 x 1 bed and 3 x 2 bed private dwellings over three storeys including basement and associated works. Each dwelling comprise of bedrooms, kitchen, TV, living room, study, courtyard, balcony, bike store and utility.
- 2.3. Further details of the proposed development are set out in Section 3.
- 2.4. This planning statement sets out the planning justification in support of the proposed development.
- 2.5. The application is also supported by the following additional documents:
  - Package of application drawings, prepared by MAA;
  - CIL Form, prepared by Indigo Planning;
  - Design and Access Statement, prepared by MAA;
  - Noise Impact Assessment, prepared by WSP;
  - Daylight/Sunlight Assessment, prepared by WSP;
  - Energy Statement, prepared by Blewburton Ltd; and
  - Energy Efficiency and Renewable Energy and Sustainability Plan, prepared by Blewburton Ltd.

#### Scope of the report

- 2.6. This statement comprises the following sections:
  - A description of the application site and surroundings and planning history is set out in Section 3;
  - A description of the development proposals is provided in Section 4;
  - An outline of relevant national, regional and local planning policy and other relevant documents is set out in Section 5;
  - The key planning considerations are set out in Section 6; and
  - Our conclusions are set out in Section 7.

## 3. Background

#### Site and Surroundings

- 3.1. The application site is currently vacant, but has been utilised for car parking for several years. To the rear of the site is an existing, unsightly two storey flat roof extension which extends from the 6 John Street property. To the rear of this extension is an extensive existing metal staircase, providing access to the upper ground floor emergency escape door, along with roof access. As the lower ground floor of the extension is half a level below ground/pavement level of 10-11 Kings Mews, another set of steps provides emergency escape from this lower ground floor.
- 3.2. Whilst this rear extension is of limited value, listed building consent has been sought as ultimately, the extension links to the Grade II listed structure at 6 John Street. This modern extension has no fabric of historic value.
- 3.3. The western side of Kings Mews, of which the application site forms a part, comprises two and three storey residential developments, with taller buildings at each end. The eastern side of the mews comprises of two and three storey post-war light industrial buildings.
- 3.4. The eastern side of the mews has historically been a mixture of commercial uses including office and light industrial (B1) and storage (B8), many of which are now vacant. However, separate planning permissions have been granted for the conversion of several sites (nos.23-24, 25, 26, 27, 28, & 29-30) since 2012 to residential uses.
- 3.5. The western side of the mews has undergone piecemeal redevelopment and is now a mixture of flats and single dwellings. The surrounding area is a mix of uses predominantly offices (B1) and residential (C3), with the busy passage of Theobald's Road to the south and Gray's Inn Road to the east.
- 3.6. The site is located within the Bloomsbury Conservation Area.

### **Relevant Planning History**

#### Site Planning History

- Listed building consent application was submitted to the Council on 13 May 2015 (LPA ref. 2015/2618/L). The application was subsequently withdrawn.
- Planning permission and Listed building consent were granted on 17 June 2014 (LPA ref. 2012/6315/P and 2012/6524/L, respectively) for the partial demolition of rear office extension at lower ground and ground floors and the erection of a new single family dwelling house (Class C3) fronting King's Mews.
- Planning permission was granted on 9 June 2009 (LPA ref. 2008/4099/P and 2008/4101/L) for the partial demolition of rear office extension at lower ground and ground floors and the erection of a new single family dwelling house (Class C3) fronting King's Mews.
- Planning permission was granted on 21 January 2002 (LPA ref. PSX010530) for the renewal of planning permission LPA ref. PS9704397 for the change of use from offices to a single residential dwelling house.
- Planning permission was granted on 17 July 1997 (LPA ref. PS9704397) for the change of use from offices to a single family dwelling house.

- Planning permission was refused on 27 January 1982 (LPA ref. 32696(R1)) and dismissed at appeal on 7 March 1983 for the redevelopment by the erection of a three storey building comprising garage and offices on the ground floor, offices and residential flat on the first floor, and a residential flat on the second floor.
- Listed building consent was granted on 5 December 1978 (LPA ref. M15/26/A/HB1947) for the demolition of existing mews building at 9-11, Kings Mews.
- Planning permission was refused on 17 October 1978 (LPA ref. M15/26/A/26775) for the extension to 6 John Street by the erection of a new building at 9-11 King's Mews, comprising garage and showroom on ground floor, offices on the first floor and residential flat on the second floor.
- Planning permission was refused on 23 February 1978 (LPA ref. 25505(R)) for the extension to 6 John Street by the erection of a new building at 9-11 Kings Mews comprising garage and offices on ground floor, offices on 1st floor and residential flat on 2nd floor.
- Planning permission was granted on 8 July 1974 (LPA ref. M15/26/A/17285) for the erection of a new building comprising garage on ground floor, storage or warehouse on first floor and residential flat on second floor.
- Planning permission was granted on 25 October 1973 (LPA ref. CMP/M15/26/A/17038) for the erection of a new building, comprising garage on ground floor and two self-contained flats on first and second floors at 9-11, Kings Mews.
- Planning permission was refused on 26 June 1968 (LPA ref. CTP/M15/26/A/5303) for change of use from warehousing to offices of the first floor of 9, 10 and 11 Kings Mews.
- 3.7. There have been a series of decisions supporting residential use on and in the immediate vicinity.

#### 10-11 Kings Mews

3.8. Planning permission and listed building consent was granted on 12 March 2013 (LPA ref. 2012/6315/P) for the partial demolition of rear office extension at lower ground and ground floors and the erection of a new single family dwelling house (Class C3) fronting King's Mews and partial demolition of rear office extension at lower ground and ground floors.

#### 6 John Street

3.9. Planning permission was granted on 30 March (LPA ref. 2014/6795/P) for the demolition of the modern extensions behind the facade of 6 John Street; additions to the roof and rear elevation; the creation of terraces from ground to fourth floor; change of use from education (D1) to provide seven residential units; access provided from John Street and associated works.

#### 22 Kings Mews

3.10. Planning permission was granted on 31 March 2015 (LPA ref. 2014/5911/P) for the erection of three storey dwelling house (Class C3) following partial demolition of existing office/storage building (Class B1/B8). This application site is a two storey 19th Century mews building formerly in office/warehouse use directly across from 10-11 Kings Mews.

#### 26 Kings Mews

3.11. Planning permission was granted on 13 February 2015 (LPA ref. 2013/7847/P) for the erection of a three-storey three-bedroom dwelling house with basement (Class C3), following demolition of existing office/warehouse (Class B1/B8).

#### 28 Kings Mews

3.12. Planning permission was granted on 7 March 2014 (LPA ref. 2013/4840/P) for the erection of a three-storey plus basement building comprising B1/B8 use at basement and ground floor level and a two-bedroom maisonette (Class C3) at first and second floor, following demolition of existing office/warehouse (Class B1/B8).

#### 4-5 John Street and 5-6 Kings Mews

3.13. Planning permission was granted on 24 November 2003 (LPA ref. PSX0205232) for the change of use from offices (B1) to a single family dwelling house (C3) with associated internal and external alterations, and the erection of a new mews house with garaging to replace the existing parking area.

#### 12 John Street

3.14. Planning permission was granted on 10 March 2014 (LPA ref. 2013/7509/P) for the change of use from office (Class B1) to residential (Class C3) to create a single family dwelling.

#### 15 John Street

3.15. Planning permission was granted on 23 October 2013 (LPA ref. 2013/3923/P) for change of use from office (Class B1) to 4-bed dwelling house (Class C3).

#### 20 John Street

3.16. Planning permission and listed building consent was granted on 9 October 2010 (LPA ref. 2013/1479/P and 2013/1397/L, respectively) for a change of use of office (Use Class B1) to residential (Use Class C3) to create five flats and one mews house, and associated alterations.

#### Haines House, 21 John Street

3.17. Planning permission and listed building consent was granted on 14 January 2013 (LPA ref. 2012/5486/P and 2012/5504/L, respectively) for the change of use of 2nd to 7th floors of 21 John Street from offices (Class B1) to eight self-contained residential units (1x1, 6x2 and 1x3 bed) (Class C3), provision of bike and bin stores in rear courtyard, replacement of window with door on rear courtyard (south-west elevation) at ground floor level, green roof above second floor level, replacement of windows to 21 John Street, upper floors of 7 Roger Street and 1-4 Mytre Court, John's Mews and associated works.

#### John Kirk House, 31 John Street

3.18. Planning permission and listed building consent was granted on 2 December 2011 (LPA ref. 2011/4196/P and 2011/4343/L) for the change of use of commercial (Class B1) building to residential (Class C3) to create 15 new residential units (4 x 1 beds, 6 x 2 bed market units and 2 x 2 bed social rented units and 3 x 3 beds) as well as additions and alterations to include demolition of existing rear facade for proposed new rear facade with inset balconies, demolition of existing plant enclosure at roof level for replacement with new structure, and minor alterations to front railings to street plus the installation of a new refuse lift from basement lightwell to the street level to existing listed building.

# 4. Proposed Development

- 4.1. The proposed scheme seeks consent to provide 4 x1 bed and 3 x 2 beds private dwellings over three storeys including basement and associated works.
- 4.2. The scheme will deliver a sustainable development which will provide much needed new housing, making better use of the site whilst preserving and enhancing the character ad appearance of the site and surrounding area.
- 4.3. The site has excellent access to public transport facilities; with a PTAL rating of 6b. In light of this, it is proposed to provide a car-free scheme.
- 4.4. Refuse and recycling storage has been located at ground floor level within the communal area.
- 4.5. The design and access statement which accompanies this application provides more detail on the proposed development and design rationale behind the chosen scheme.

# 5. Planning Policy Context

### **National Planning Policy Framework**

- 5.1. The National Planning Policy Framework (NPPF) sets out government planning policy with which development plans must accord. It is a material consideration in decision-taking.
- 5.2. Paragraph 14 of the NPPF states that:

*"At the heart* of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-*taking."* 

5.3. Essentially, the message from the Government, via the NPPF, is that the first instinct of local planning authorities should be to support new development. Only if there are very strong reasons should permission be refused.

### **National Planning Practice Guidance**

- 5.4. The Government has published the final version of the National Planning Practice Guidance (NPPG). It is also a material consideration in determining planning applications.
- 5.5. Existing technical guidance including the Practice Guidance has now been cancelled. The NPPG provides an explanation of the government's interpretation of policy in the Framework. Relevant to this application is the guidance relating to setting of a heritage asset and assessing substantial harm.

#### The Development Plan

- 5.6. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.7. The current Development Plan for the London Borough of Camden includes the London Plan 2016 and the Camden Local Plan 2017. The relevant policies from each of these documents are identified below.
- 5.8. Key policies relevant to this application are:

#### LB Camden Local Plan 2017

- G1 Delivery and location of growth
- H1 Maximising housing supply
- H4 Maximising the supply of affordable housing
- H6 Housing choice and mix
- H7 Large and small homes
- H10 Housing with shared facilities
- C6 Access for All
- A1 Managing the impact of development
- A4 Noise and vibration
- A5 Basements
- D1 Design
- D2 Heritage
- CC1 Climate change mitigation
- CC2 Adapting to climate change

- CC3 Water and flooding
- CC5 Waste
- T1 Prioritising walking, cycling and public transport
- T2 Parking and car-free development

#### Other relevant guidance

 London Plan 2016 (relevant policies include – Policy 3.3 Increasing housing supply; Policy 3.4 Optimising Housing Potential; Policy 3.5 Quality and Design of Housing Developments; Policy 3.8 Housing Choice; Policy 3.14 Existing Housing; Policy 7.2 An Inclusive Environment; Policy 7.4 Local Character; Policy 7.8 Heritage Assets and Archaeology).

#### **Camden Planning Guidance**

- CPG 1 Design
- CPG 2 Housing
- CPG 3 Sustainability
- CPG 4 Basement and lightwells
- CPG 6 Amenity
- Bloomsbury Conservation Area character appraisal and management strategy 2011.

# 6. Key Planning Considerations

- 6.1. The key issues in this case are:
  - i. The principle of residential use;
  - ii. Standard of accommodation proposed;
  - iii. Design and layout;
  - iv. Amenity;
  - v. Sustainability;
  - vi. Transport and parking; and

vii. Heritage.

#### i. The principle of residential use

#### The proposal will restore the site to a former use more suitable to its existing context

- 6.2. The site has previously received planning permission for the use of the site for residential dwelling. It is relevant that housing was the original use and purpose of the application site and the wider area generally. The site is flanked on either side by three storey private residential properties.
- 6.3. In this way, the proposals will restore a vacant site back to use, ensuring a sustainable longterm future use for the site.

#### The proposal assists with policy objectives

- 6.4. Camden's and London's overriding priority is the provision of new, quality housing. This proposal fully accords with that objective. Providing housing is a key objective of every element of the development plan and government guidance:
  - The NPPF seeks, at paragraph 47, to boost significantly the supply of housing and requires local planning authorities to meet in full their objectively assessed need. It states that the presumption in favour of sustainable development should be applied to housing applications (paragraph 49);
  - The London Plan states in Policy 3.3 that there is a pressing need for more homes;
  - Camden Local Plan Policy H1 supports the provision of housing within the borough in order to exceed the target of an additional 16,800 homes by 2030/31. In particular selfcontained homes, vacant properties and sites with existing residential permission are viewed as a priority area for residential development.
  - Policy H4 aims to maximise the supply of affordable housing and aim for an appropriate mix of affordable housing types.
  - Policy H6 seeks to minimise social polarisation by creating mixed, inclusive and sustainable communities through the development of high quality accessible homes. This

includes consideration of household type, size, income and needs for both present and future households. Parts (a)-(p) aim to create a variety of high quality, accessible homes with a consideration of appropriate housing needs for a wide variety of residents. This is further enforced by Policy H8 which sets out particular requirements for housing availability for older people, homeless people and vulnerable people.

- Policy H7 aims to ensure a wide range of residential units of different sizes to reduce a
  mismatch between housing need and existing supply. The Dwelling Size Priorities tabole
  sets out the desired priorities and the council wll take a flexible approach in assessing the
  mix of dwelling sizes with regard to parts (c)-(h).
- 6.5. The development of this site for seven new residential mews dwelling units provides a contribution toward meeting the needs of the borough and accords with the Government's, the GLA's and Camden's objectives.
- 6.6. The proposal accords with the policy objective of increasing housing supply, reuse of a vacant site and ensures the proposal has long-term sustainable use. It is, essentially, appropriate for residential development.

#### Affordable housing

6.7. As the development is proposing less than 10 dwellings, the applicant is willing to pay a contribution towards the off-site provision of affordable housing, in accordance with Policy H4 of the Local Plan.

#### ii. Standard of Accommodation Proposed

- 6.8. The key issues in terms of residential standards of accommodation are discussed below:
  - Mix and density
  - Size of the units;
  - Outdoor amenity space;
  - Lifetime homes standards; and
  - Provision of refuse/storage.

#### Mix and density

- 6.9. The application proposes an appropriate mix of one and two bed residential units in accordance with the London Plan.
- 6.10. The Local Plan notes that Camden Council will "expect densities towards the higher end of the appropriate density range in the matrix" in areas with high public transport accessibility levels.
- 6.11. The density of the proposed development would equate to approximately 350 u/ha. This is accords with the London Plan and is considered acceptable given the site is located within the Central Activities Zone (CAZ).
- 6.12. Furthermore, as noted overleaf, the development accords with all relevant accommodation standards, preserves neighbouring amenities and complements the design and character of the surrounding area. The scheme, therefore, does not exhibit any of the symptoms of overdevelopment.

#### Size of the units

- 6.13. The units have been designed so that they will provide a suitable standard of accommodation for future occupiers and are all dual aspect. Each unit is designed to take account of the overall floor areas and all the units meet the minimum gross internal floor areas set out in nationally described space standards (March 2015). The development therefore adheres to Policy 7.6 of the London Plan.
- 6.14. All bedrooms are generously sized, all as double bedrooms with a minimum floorspace of 11.3sqm and easy access to bathrooms. This exceeds the minimum guidance set out in Camden Planning Guidance 2 (CPG). Each unit is regular in shape and adequate distance has between the units on each floor through the provision of a communal staircase and hall area. This will minimise the disturbance between the proposed and existing units and provide a better standard of living for future and existing occupiers.

#### Outdoor amenity space

- 6.15. In line with the Camden Planning Guidance, each dwelling unit is self-contained and has its own secure private entrance and access to some form of outdoor amenity space. The guidance notes that outdoor amenity space should be met where practical. Outdoor amenity space is provided in units 1,2 and 7 in the form of outdoor terraces and private balconies accessible from the main living space, with good reception of direct sunlight. All balconies and terraces are limited in size to ensure there will be no unacceptable impact on the amenity of neighbouring occupiers
- 6.16. Whilst units 3 6 do not provide private amenity space, given the demand for housing in the area and that the site is located in a highly urbanised area in close proximity to Grays Inn Gardens (less than a 2 minute walk from the site), this should not be to the detriment of the suitability of accommodation.
- 6.17. All habitable rooms have access to natural light and ventilation and meet the required BRE standards.

#### Provision of refuse/storage

6.18. In accordance with CPG 01, section 10: Waste and Recycling Storage, the refuse and recycling storage areas have been provided at the front edge of the site. The amount of internal storage space has also been designed to accord with the CPG 02 requirements. The capacity of external storage space has been calculated using the internal storage space provided, detail is provided in the Design and Access Statement.

#### Summary

6.19. The proposal accords with the policy objective of increasing housing supply, reuse of a vacant site and ensures the proposal has a long-term sustainable use. In addition, the innovative architecture and high quality design included in the proposal create a high quality housing development in line with the Local Plan 2017 vision for Camden. It is, essentially, appropriate for residential development.

#### iii. Design and Layout

6.20. This scheme meets the high standards of design required by all levels of policy. The fourth Core Principle of the NPPF, at paragraph 17, seeks development that secures high quality design and a good standard of amenity for existing and future occupants. It states at paragraph 58 that policies should, amongst others, ensure developments function well and add to the overall quality of the area, establish a strong sense of place, respond to local character, are visually attractive and optimise the potential of the site for accommodating development.

- 6.21. Policy D1 seeks to secure high quality design in development that integrates well with the surrounding context and character.
- 6.22. The buildings adjacent to the site range from two to four storeys in height. The proposed building is three storeys (plus basement) and is set back on the third floor. The development therefore reflects the height and massing of its neighbours. The development will also help establish a stronger building line on the west side of King's Mews and improve the street frontage.
- 6.23. It should be noted that the scale and mass, and general approach to the design of a building on this site is similar to permission 2012/6315/P and therefore the design should be considered acceptable by the Council. The officers report of the application specifically states that the "overall proportions and massing with the two main storeys and recessed roof level" are considered to be acceptable.
- 6.24. Overall, through sympathetic alterations to the design, footprint and architectural composition, the scheme will respect, reinforce and enhance local character, in accordance with local and national policy.

#### iv. Amenity

- 6.25. Policy A1 seeks to manage the impact of development on occupiers and neighbours by only permitting development that does not cause harm to amenity. The factors which determine this include visual privacy, overlooking, outlook, sunlight/daylight and noise.
- 6.26. The distance between the property and buildings along Kings Mews is sufficient in this urban context to ensure there will be no significant adverse impacts on amenity of neighbouring properties. The layout of the units ensures that the potential for overlooking is reduced and the privacy of adjoining occupiers is protected.
- 6.27. A Daylight Sunlight Assessment has been prepared by WSP. The assessment concludes that the development complies with BRE criteria on the first and second floors. Seven rooms in the basement and ground floors do not meet the BRE criteria, however, three of these fall marginally short of the criteria. Overall, given the sites context in a sustainable and highly urbanised area where there is a significant demand for housing, we believe the merits of the development outweigh this shortfall.
- 6.28. In regards to the impact on the amenity of surrounding occupiers, the daylight sunlight report concludes that the proposal does not represent any adverse impacts to the level of daylight and sunlight to adjacent properties compared to the approved development (permission 2012/6315/P)
- 6.29. A noise report has been prepared by WSP and concludes that the noise levels are considered representative of the existing noise climate at the proposed development.

#### v. Sustainability

- 6.30. Sustainability is integral to the design and proposals include measures to meet the key sustainability objectives.
- 6.31. The London Plan requires new residential development to have a zero carbon emission standard (Policy 5.2) through application of the energy hierarchy. Camden's Local Plan states that the Council will require developments to minimise their effects on climate change and meet the highest feasible environmental standards.
- 6.32. An Energy Statement prepared by Blewburton Ltd has been submitted alongside this application. The Statement notes that PV technology is the viable solution at the site and will enable the development carbon emissions for the site exceed the Building Regulations of 2013 by 40%. The development will therefore exceed Camden's requirements.

#### vi. Transport and Parking

- 6.33. CPG 7 states that a development should be a car free development when it is in an accessible location.
- 6.34. The site has a PTAL score of 6b (excellent), demonstrating the high level of public transport accessibility. The nearest stations are Chancery Lane, Holborn, Russell Square and Farringdon which all provide access to the London Underground. Farringdon provides access to national rail services. The Underground stations range in distance (between 650 metres and 1km) from the site. There is also a variety of bus routes. The scheme therefore proposes a car-free development, in accordance with Local Policy. The applicant would accept a legal agreement restricting access to on-street car parking.
- 6.35. The cycle storage area is located on the Ground Floor near to the entrance of the building and has been designed in line with CPG 7. Secure cycle parking will be provided for 10 bicycles, in line with the minimum standards set out in the London Plan. The development is also only 12m away from a Santander Cycles docking station on Northington Street and the site has a high PTAL rating. The applicant is willing for the details of the cycle parking to be conditioned.
- 6.36. The numerous modes of transport available from the site means that there is no unacceptable transport impact on the transport system, highways, on-street parking and footway space.

#### vii. Heritage

- 6.37. Policy D2 seeks to preserve and enhance Camden's historic assets. Nos. 2-9 St John Street are located to the rear of the site and are Grade II listed. 6 St John Street sits immediately behind the site, however, the property was rebuilt in Neo-Georgian style in the 1960s and restored subsequently in 1989. The internal areas of the property and the rear elevations and structures are not typical of other buildings with the terrace along John Street or within the surrounding Conservation Area. Listed building consent has already been granted for the demolition of 6 St John Street whilst retaining the front façade of the property.
- 6.38. Given the site is located to the rear of the property the development would not affect the setting of the façade of 6 St John Street. Furthermore, the Council acknowledged in permission 2012/6315/P that the development of this site would not harm the setting of the listed terrace of John Street.
- 6.39. The site lies within Sub Area 10 (Great James Street/Bedford Row) of the Bloomsbury Conservation Area. The Conservation Area Appraisal and Management Strategy (April 2011) states that brick is the predominant building material used across the Conservation Area. To ensure the proposal enhances the appearance of the Conservation Area, London Stock Brick in Flemish Bond with Wandsworth Smudge pointing will be used. The dimensions of the window frames reflect the original coach house doors.
- 6.40. The proposal will therefore enhance the character and appearance of the conservation area in accordance with Policy D2.

## 7. Conclusions

- 7.1. The proposal represents an economically, socially and environmentally sustainable scheme which will meet Camden and the London Plan policy objectives.
- 7.2. The principle of development is acceptable as it would provide much needed residential housing on a brownfield site in a sustainable location. Furthermore, permission has already been previously granted for residential development on the site (LPA ref. 2012/6315/P).
- 7.3. The proposed development will be of a high quality design which responds well to the surrounding urban fabric without having a material impact on the amenities of neighbouring properties. As such, it is concluded that the development will enhance the character and appearance of the surrounding townscape and the Bloomsbury Conservation Area. The scheme will also provide a high quality environment for future occupiers and will meet the required internal space standards
- 7.4. The application is accompanied by a suite of supporting documents which demonstrate that the development, on balance, is in accordance with national, regional and local planning policies and guidance. In light of all the above, the application should be supported by the local authority and approved without delay, in accordance with the NPPF.