

# PLANNING STATEMENT



## CHANGE OF USE TO PROVIDE NEW RESIDENTIAL UNITS AT 2 TOWER COURT, LONDON WC2H 9TW

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### EXECUTIVE SUMMARY

- This Planning Statement accompanies an application for planning permission at 2 Tower Court, London, WC2H 9TW for the change of use of the vacant premises to two residential units.
- The Proposed Development comprises of 2x 1-bed units. All units would adhere to relevant London Plan (2016) policy and Camden's development plan policies (**See: page 12**).
- Alterations will be made to the existing building to remove the existing unsympathetic conservatory and re-instate the original lightwell in addition to providing a new ground floor entrance, with the resultant development enhancing the significance of the Grade II listed building and enhancing the adjoining heritage assets in addition to the character and appearance of the Conservation Area (**See: page 10**).
- The proposed development will be 'car-free' and will provide cycle parking and refuse storage in line with relevant London Plan and Camden standards (**See: page 15**).
- The Proposed Development positively responds to the Council's adopted development plan policies pertaining to quality urban design and neighbourly development, whilst preserving or enhancing the significance of the adjacent heritage asset and consequently the presumption in favour of granting planning permission is met and planning permission should be granted without delay in accordance with paragraph 14 of the NPPF.

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## 1.0 INTRODUCTION

1.1.1 This Planning Statement (“**Statement**”) accompanies an application for planning permission at 2 Tower Court, London, WC2H 9TW (“**Site**”) for the “**Proposed Development**”:

*“Change of use to provide 2 residential units”*

1.2 The application is submitted to the London Borough of Camden (“**Council**”) on behalf of British Retail Consortium (“**BRC**”) under the Town and Country Planning Act 1990.

1.3 This Statement explains how the Proposed Development will provide new residential units at the Site in compliance with the relevant national planning policy, the development plan and other material considerations.

1.4 This Statement should be read in conjunction with the following documents submitted:

- Application Form;
- Existing and Proposed drawings (prepared by Claridge Architects dated 10<sup>th</sup> April 2019);
- Design and Access statement (prepared by Claridge Architects dated 10<sup>th</sup> April 2019);
- Heritage Impact Assessment (prepared by EDP Ltd reference edp5207\_r002a);
- CIL Form; and
- Location Plan

## 2.0 SITE AND SURROUNDINGS

- 2.1 The Site is located in the south-east of the borough on a small plot measuring approximately 0.058ha bounded by the four-storey mixed use terrace along Earlham Street to the north, part 5-storey, part 6-storey 22 Tower Street to the south, and to the east by the pedestrianised alleyway at Tower Court which feeds onto Tower Street, Monmouth Street and Earlham Street.
- 2.2 2 Tower Court is a three-storey Victorian building which is characterised by its front projecting gable and decorative red brick banding around the window arches and quoins. 2 Tower Court also features an unsympathetic uPVC 1980s conservatory which has no architectural merit and modern security railings are secured across the upper floor windows of the building. The existing uPVC conservatory conceals a former lightwell which was extended as part of works to enlarge the basement room.
- 2.3 The existing building has a lawful use as an Office (Use Class B1), and was used as entertainment and relaxation space linked to the office use at the adjacent 22 Tower Street, prior to the previous occupants vacating the Site in 2013.
- 2.4 The Site is located within Sub Area One of the Seven Dials Conservation Area, and is sited adjacent to the rear exterior space of the Grade II listed 22 Tower Street. Sub Area One of the Conservation Area as defined by the Seven Dials (Covent Garden) Conservation Area Statement is characterised by the distinctive grouping of commercial buildings in close proximity to domestic terraces, with residential uses considered an important facet of the special quality of the Conservation Area.
- 2.5 The Site is located at the heart of London in close proximity to a number of underground stations and is also served by a number of local bus services. The Site has a Public Transport Accessibility Level (“PTAL”) of 6b (Excellent) on a scale of 0 to 6b, where 1 is poor and 6b is excellent.

### **3.0 THE PROPOSED DEVELOPMENT**

- 3.1 The Proposed Development is for the provision of two residential units and internal refurbishment and alterations at the Site. The two new units consist of 2x 1-bed 2-person duplexes accommodated within the existing fabric of the building.
- 3.2 The building will be converted into a residential use from its lawful use as offices (B1a), given the building is no longer viable as independent office space.
- 3.3 The Proposed Development would also involve the removal of the existing unsympathetic conservatory to facilitate a new lightwell to serve the basement floor of the duplex unit.
- 3.4 The internal refurbishments consist of the replacement of a small section of staircase and an internal partition on the ground floor, whilst a new door will be inserted into the principle elevation adjacent to the existing doors which feature replacement glazing in black crittal steel.
- 3.5 The Proposed Development will be 'car-free' with cycle parking and waste and refuse facilities provided in a secured location within the Site.
- 3.6 A detailed assessment of how the Proposed Development conforms to the policies contained in the adopted development plan is contained within Section 6 of this Statement.

## 4.0 PLANNING HISTORY

4.1 The relevant planning history of the Site has been tabulated below.

Reference	Address	Description	Status
2008/0926/P	2 Tower Court, London, WC2H 9NU	Erection of single storey rear extension to office, following demolition of existing conservatory.	Granted. 27/02/2008
8800250	<i>Same as above</i>	Approval of details of design of conservatory pursuant to additional condition 02 of the planning permission (PL/8703525/R1) dated 20th January 1988.	Granted/Approval of details. 03/06/1988
8870099	<i>Same as above</i>	Approval of details of design of conservatory pursuant to additional condition 03 of listed building consent (Reg. No. 8770319(R1)) dated 20th January 1988.	Granted/Approval of details (Listed building). 03/06/1988
8770319	School House 2 Tower Court WC2	Alterations to the building including the excavation of part of the basement area in the yard to form a sunken patio area and the erection of a glazed conservatory and the erection of a brick boundary wall as shown on drawing numbers 1542/2C & 1487/106B revised on 30th November 1987.	Grant Listed Building or Conservation Area Consent
8703525	<i>Same as above</i>	Alterations to the building including the excavation of part of the basement in the yard to form a sunken patio area the erection of a glazed conservatory and the erection of a brick boundary wall as shown on drawing numbers 1542/2C & 1487/106B revised on 30th November 1987.	Grant Full or Outline Permission with conditions
2014/3425/P	22 Tower Street, London, WC2H 9NS	Change of use and conversion from offices (B1) to 22 residential units (C3) comprising 3 x studio units, 12 x one-bed units, 5 x two-bed units and 2 x three-bed unit including removal of exiting orangery and replacement with new two storey structure.	Granted Subject to a Section 106 Legal Agreement

4.2 The 2008 application reference 2008/0926/P for the erection of a single storey rear extension to the office also involved the removal of the existing uPVC conservatory. Whilst this consent was not implemented, in describing the uPVC conservatory in the delegated report officers commented that *“the existing uPVC conservatory does not relate well to the site, the existing building is considered to be an ‘of-the-shelf’ design which has been poorly considered for a Conservation Area”*.

- 4.3 In place of the conservatory the Council were accepting of a replacement contemporary structure, which was considered to not have a detrimental impact on the wider Conservation Area, despite retaining the visual prominence of the uPVC conservatory.

## 5.0 PLANNING POLICY

5.1 In accordance with Section 38(6) of the Planning & Compulsory Purchase Act (2004), applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise. Under Section 38(2), the development plan for any area within Greater London comprises the Spatial Development Strategy and the development plan documents (taken as a whole) which have been adopted and approved in relation to that area. The statutory development plan for the Unit comprises of the following:

- Camden Local Plan (2017)
- The London Plan 2016
- Draft London Plan 2018 (Examination in Public)

5.2 Other material considerations that should be taken into account when assessing applications for planning permission are:

- National Planning Policy Framework (2019)
- Camden Planning Guidance: Design (2019)
- Camden Planning Guidance: Employment sites and business premises (2018)
- Camden Planning Guidance: Interim Housing CPG (2018)
- Camden Planning Guidance: Basements (2018)
- Camden Planning Guidance: Transport (2018)
- Camden Planning Guidance: Public Open Space (2018)
- Seven Dials (Covent Garden) Conservation Area Statement

### Camden Local Plan (2017) (“Local Plan”)

5.3 The Local Plan policies which are considered relevant to the Proposed Development are listed below:

H1 – ‘Maximising housing supply’

H4 - ‘Maximising the supply of affordable housing’

E2 – ‘Employment premises and sites’

A2 – ‘Open space’

A5 – ‘Basements’

D1 – ‘Design’

D2 – ‘Heritage’

T1 – ‘Prioritising walking, cycling and public transport’

T2 – ‘Parking and car-free development’

CC5 – ‘Waste’

#### The London Plan (2016) (“London Plan”)

5.4 The London Plan Policies which are considered relevant to the Proposed Development are listed below:

3.3 – ‘Increasing housing supply’

3.5 – ‘Quality and design of residential accommodation’

4.2 – ‘Offices’

6.13 – ‘Parking’

7.6 – ‘Architecture’

7.8 – ‘Heritage assets and archaeology’

#### Draft New London Plan (“New London Plan”)

5.5 The New London Plan Policies which are considered relevant to the Proposed Development are listed below:

D1 – ‘London’s form and characteristics’

D2 – ‘Delivering good design’

D4 – ‘Housing quality and standards’

E1 – ‘Offices’

Policy H1 – ‘Increasing housing supply’

Policy HC1 – ‘Heritage conservation and growth’

Policy T5 – ‘Cycling’

Policy T6 – ‘Car parking’

## 6.0 PLANNING ASSESSMENT

6.1 The main issues relating to the Proposed Development are:

- Principle of development
- Impact on the Grade II Listed Building and its setting
- Quality of accommodation and its design
- Highways and refuse impacts

### Principle of Development

#### London Plan

6.2 London Plan Policy 3.3A 'Increasing Housing Supply' recognises the *"pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford"*.

6.3 This strategic policy is reflected and strengthened by the New London Plan in Policy H1 'Increasing housing supply'. New London Plan paragraph 3.6.1 states *"For London to accommodate the growth identified in this Plan in an inclusive and responsible way every new development needs to make the most efficient use of land"*.

6.4 London Plan Policy 4.2 'Offices' in managing London's changing office market outlines the strategic aims for the mayor, boroughs and other stakeholders which supports the *"managed conversion of surplus capacity to more viable, complementary uses"*.

6.5 This is echoed by the New London Plan Policy E1 'Offices' which asserts, *"Development proposals should support the redevelopment, intensification and change of use of surplus office space to other uses including housing"*.

#### Camden Local Plan

6.6 Local Plan Policy H1 'Maximising housing supply' states *"we will seek to exceed the target for additional homes, particularly self-contained homes by, regarding self-contained housing as the priority land-use of the Local Plan, where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site"*.

6.7 Policy E2 'Employment premises and sites' states the Council *"will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction, the site or building is no longer suitable for its existing business use; and 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”.*

- 6.8 When considering the existing use of the building, it can be demonstrated that 2 Tower Street is a long-term vacant unit which would not be suitable for continued use as office accommodation, with the alternative residential use compatible within the locality, which features a predominantly residential land use in the vicinity of the Site, a characteristic noted in the Seven Dials Conservation Area statement.
- 6.9 Policy E2 explanatory paragraph 5.37 ‘Proposals involving loss of business premises and sites’ states that in considering the acceptability of the proposed loss of employment floorspace the Council will consider *“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”*. The Policy states that further guidance is contained in the ‘Employment sites and business premises SPD 2018’ (**“Employment SPD”**).
- 6.10 Paragraph 9 of the Employment SPD explains that *“The Council recognises that not all existing employment premises will be able to offer the same standards of accommodation as new build premises”* and the Policy goes on to state *“that there is potential for business use to continue in existing employment premises which are in reasonable but not perfect condition”*.
- 6.11 In the case of 2 Tower Court, there is no realistic prospect of the property being used for office use. The previous tenant did not use the property for conventional office use and instead the space was used solely for entertainment or relaxation purposes. The fact that 2 Tower Court has lawful B1(a) office use is only derived from the premises being ancillary to the primary use at the wider site. Therefore, in response to Employment SPD paragraph 9, the Site is neither in a *“reasonable”* condition nor does it meet the threshold to be considered *“not perfect condition”*; rather the Site is incapable of being used as effective employment generating floorspace.
- 6.12 The inability to use the Site for employment use has been verified by the longstanding vacancy of the Site. The Site and adjoining 22 Tower Street building were vacated by the former tenant in early 2013 and both have remained vacant to date. Efforts to let and sell the property have been fruitless and efforts were even made to redevelop the wider site through the approval of an application for change of use and listed building consent to provide 22 flats (ref: 2014/3425/P) which, for one reason or another, was not implemented and the entire site has remained vacant.

6.13 In considering the provisions outlined in both iterations of the London Plan and the Local Plan, it is considered that the Proposed Development would provide a quantum of housing on a windfall site which would contribute to Camden's ascribed need and would result in the repurposing of a vacant, underutilised Site to the benefit of the wider locality.

#### **Impact on the Grade II Listed Building and its setting**

6.14 22 Tower Street (Historic England list entry no. 1379048) is a Grade II Listed former 19<sup>th</sup> century board school which is notable for its elaborate architectural features along the principal Tower Street elevation, including the entrance doorcase, relief panels and overall detailing.

6.15 The significance of that building lies with its architectural and historical interest. Its architectural interest relates to the fabric of the exterior of the building, as evidenced by the detail in the listing citation by Historic England. The historical interest in 22 Tower Street relates to its use as a school for the under-privileged in the 19<sup>th</sup> century.

6.16 2 Tower Court is also Grade II Listed by curtilage due to its association with 22 Tower Street.

6.17 5-8 and 10 Tower Court (Historic England list entries no. 1379041 and 1379043) are Grade II listed buildings which adjoin the south-east of the site, on the opposite side of Tower Court. These four buildings are notable for having redundant commercial facades, whilst being in residential use. This marriage between commercial and residential is a characteristic of this sub area of the Seven Dials Conservation Area. The primary interest with these properties is in their architectural merit and the design features of their façades.

6.18 When considering the impact that the Proposed Development has on the significance of the heritage asset and the setting of the Grade II listed Tower Court and the terrace at 5-8 and 10 Tower Court, the National Planning Policy Framework (2019) ("**NPPF**") Paragraphs 192, 193, 195 and 200 are particularly important. These state as follows:

- **Paragraph 192:** *"In determining planning applications, local planning authorities should take account of...the desirability of new development making a positive contribution to local character and distinctiveness."*
- **Paragraph 193:** *"When considering the impact of the 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. Significance can be harmed through...development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification."*

- **Paragraph 195:** *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”*
- **Paragraph 200:** *“Local planning authorities should look for opportunities for new development...within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance should be treated favourably.”*

- 6.19 London Plan Policy 7.8 ‘Heritage assets and archaeology’ also states *“development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail”*, with these principles being reinforced by New London Plan Policy HC1 ‘Heritage conservation and growth’.
- 6.20 Local Policy D2 ‘Heritage’ confers that *“the Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss”*. Policy D2 continues, *“the council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area, [and] makes a positive contribution to the character or appearance of a conservation area”*.
- 6.21 S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that *“in the exercise, with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”*.
- 6.22 In support of the Proposed Development, and assessing its impact on the significance of the heritage asset and the character and appearance of the Seven Dials Conservation Area, a Heritage Impact Assessment (“**HIA**”) has been prepared by EDP Ltd to further explore these impacts.
- 6.23 The HIA states that the existing building at 2 Tower Court currently makes a negative contribution to the significance of the Grade II listed buildings, and the character and appearance of the Conservation Area, by reason of the uPVC 1980s conservatory and its prominence within the Tower Court alleyway.
- 6.24 In removing this poor-quality element, it is considered that the Proposed Development would represent an enhancement of the existing experience of both listed buildings. The lightwell would be a reinstatement of an original feature of the property lost in the development of the existing

conservatory, whilst the new door opening would be commensurate to the existing adjacent doorway opening in terms of its size and detailing. Both of the doors would have no significant adverse impact on the significance of nearby heritage assets or the character and appearance of the Conservation Area, whilst the principle of contemporary design features on the ground floor was established with the application granted in 2008.

- 6.25 Minor alterations are proposed internally within 2 Tower Court which are required to facilitate the arrangement of the duplex units. These alterations would not alter the fabric of the building, would retain the general arrangement of the rooms and given the nature of internal partitions would not greatly detract from the overall significance of the building. It is noted that there are little to no surviving heritage features inside 2 Tower Court.
- 6.26 The HIA therefore concludes that when assessing the impact of the Proposed Development *“there would be an enhancement to the building through the demolition of the 1980s conservatory. Fabric alterations are minimal, and the proposed new entrance is in keeping with the overall style of the building. Overall, it is considered that the alterations would cause ‘no harm’ to the building and secures the long-term future of the building and its optimum viable use”*. In addition, *“the proposals are considered to represent an enhancement to the existing character and appearance of the conservation area, due to the removal of the poor-quality conservatory. Similarly, this is considered to enhance the experience of the adjacent listed buildings”*.

## **Design, Quality and Space Standards**

### Design

- 6.27 Local Plan Policy D1 ‘Design’ outlines the Council’s overarching design principles for development including ensuring that development respects local context and character, comprises details and materials that are of high quality and complement the local character, and for housing, provides a high standard of accommodation.
- 6.28 As outlined in the accompanying Design and Access Statement (“**DAS**”), a comprehensive design analysis incorporating materiality, local architectural character study and façade composition has been undertaken to inform the design of the Proposed Development and ensure it complements the architectural language of the locality including the adjacent heritage assets (see pages 15-18 of the DAS prepared by Claridge Architects).
- 6.29 The fenestration to be introduced along the ground floor would take inspiration from architectural interventions which introduce contemporary elements to existing traditional buildings within an

urban setting. The proposed reinstated lightwell would also not be visible from the public alleyway and would therefore be sensitively located to ensure it has negligible impact on the visual amenity of the locality in adherence to Local Plan Policy A5 'Basements' and Camden's Planning Guidance: Basements.

- 6.30 The security window bars along the eastern and southern elevations of the building are also proposed to be removed which would return the windows to their original state and would be a further enhancement to the building, given the existing windows visibility.
- 6.31 London Plan Housing Supplementary Planning Guidance (2016) ("**Housing SPG**") Standard 28 'Privacy' provides a guide of between 18-21m between habitable room windows to ensure dwellings are provided with an adequate level of privacy in relation to neighbouring properties. The southern-facing rear windows which would have a residential use are located between 12-20m from the upper floor windows at the properties at nos. 5-10 Tower Court at an oblique angle, whilst mature trees along the north-eastern boundary of 22 Tower Street would provide a degree of screening in the summer months.
- 6.32 It is therefore considered that whilst the removal of the conservatory has the most benefits to the visual amenity of the locality, the other proposed elements would also respect local context and character, whilst the materiality of the Proposed Development would benefit the siting of the building in close proximity to a number of heritage assets.

#### Quality and Space Standards

- 6.33 London Plan Policy 3.5 'Quality and design of residential accommodation' requires the design of all new housing to "*enhance the quality of local places*" and in doing so new dwellings should provide "*adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose*".
- 6.34 These inherent principles are shared by emerging New London Plan Policy D4 'Housing quality and standards' which states that housing development should be of high-quality design, and provide adequately-sized rooms, with comfortable, convenient and efficient room layouts, which are functional and fit for purpose.
- 6.35 Camden Planning Guidance on Amenity and Interim Housing outlines the principles for housing development in the Borough which are applicable to all types of self-contained houses and flats including those created through conversions and changes of use.

6.36 Underpinning the principles of the residential quality policies in the London Plan and the Council’s planning guidance are the minimum internal space standards as outlined in the Technical Housing Standards<sup>1</sup>. A schedule of the dwelling sizes for the proposed new units are outlined below in Table 1 and as evidenced both units in the Proposed Development would exceed the ascribed minimum standards.

Table 1: Proposed Dwelling Sizes

Unit	Required (sq.m.)	Proposal (sq.m.)	+/- (%)
Unit 01 (1b2p)	50	50.6	101
Unit 02 (1b2p)	50	55.2	110

6.37 In addition, the Technical Housing Standards requires double rooms to have a Gross Internal Area (“GIA”) of 11.5sq.m. All newly proposed dwellings would also adhere to these technical specifications.

6.38 In addition to the Technical Housing Standards, the Proposed Development would also adhere to the general principles for new homes outlined in Camden Planning Guidance: Interim Housing. The two-living room/kitchens/dining rooms have been stacked between the ground and first floors of the building to avoid undue noise and general disturbance between the two units. Both units would benefit from satisfactory outlook, light and ventilation from habitable rooms (which have south-facing fenestration), which is particularly pertinent given the tight urban grain in which the Site is situated.

6.39 With regards to private amenity space Local Plan Policy A2 ‘Open Space’ requires developments to provide 9sqm of outdoor amenity space per occupant for residential schemes.

6.40 Whilst not providing any private amenity space, the Proposed Development is located in a highly accessible area close to local amenities, is not in an area of Public Open Space Deficiency as defined by the London Plan and provides non-family 1-bed 2-person units. The lack of private amenity space for the proposed units is therefore not considered detrimental to the quality of accommodation in this instance.

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<sup>1</sup> Department of Communities and Local Government - Technical housing standards - nationally described space standards March 2015

## Parking and Refuse

### Vehicle Parking

- 6.41 Local Plan Policy T2 'Parking and car-free development' states that the Council will limit the availability of parking and require that all new development in the borough be 'car-free'.
- 6.42 There is a clear strategic objective to reduce the provision of, and dependency upon car ownership, whilst promoting more sustainable modes of transport particularly in areas where there is good access to public transport.
- 6.43 The Site has a PTAL rating of 6b, is located in close proximity to local bus services and a number of underground stations.
- 6.44 The Proposed Development would be car-free which would accord with the aims and objectives of Local Plan Policy T2, in contributing to a modal shift by prospective occupants towards more sustainable forms of transport.

### Cycle Parking

- 6.45 Table 6.3 of the London Plan prescribes the minimum levels of cycle parking that should be provided at new development. Table 6.3 states that 1 cycle parking space should be provided for 1-bedroom dwellings and 2 spaces should be provided for all other dwellings.
- 6.46 The Proposed Development is therefore required to provide a minimum of 2 cycle storage spaces for the new units. These will be provided within a secured area accessed from the communal external area in line with the London Plan Housing SPG Standard 21 'Cycle storage'.

### Refuse

- 6.47 Local Plan Policy CC5 'Waste' states that development should, *"include facilities for the storage and collection of waste and recycling"*. Camden's Planning Guidance: Design, outlines specific waste management criteria for new housing development. Paragraph 8.10 states that the Council offers collection services for the following minimum volumes per dwelling per week:
- 120 litres of bin, box or sack volume for general waste or 'refuse'
  - 140 litres of mixed dry recycling
  - 23 litres of food waste
- 6.48 Camden's Planning Guidance: Design also requires buildings to have off-street collection areas at ground level, residents should not have to carry waste sacks more than 15m or manually navigate flights of steps whilst external storage areas should be secure.

6.49 Refuse is stored in a secured bin store integrated between a privacy screen and external wall, 7.5m from the front doors of the proposed units which accommodates 2x 27L food waste bins. It is therefore considered that there is sufficient provision for waste storage, in accordance with Camden’s Planning Guidance on design of waste storage.

**Affordable Housing**

6.50 Local Plan Policy H4 ‘Maximising the supply of affordable housing’ sets out Camden’s method of capturing affordable housing contributions from any development which provides one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. A sliding scale target applies to developments that provide one or more additional homes starting at 2% for one home and increasing by 2% for each home added to capacity. The Council accept a payment-in-lieu for development with a capacity of less than 10 additional dwellings.

6.51 Camden’s Planning Guidance: Interim Housing Figure IH6 outlines the formula for calculating payments in lieu of affordable housing and when applied to the Proposed Development the affordable housing contribution would be:

<b>Additional residential floorspace (GIA)</b>	106.6
<b>Capacity (rounded floorspace addition/100sq.m.)</b>	1 additional home
<b>Affordable housing % target (Capacity x 2%)</b>	2%
<b>Estimated GEA (GIA x 1.25)</b>	106.6 x 1.25 =133.25
<b>Affordable housing floorspace target (% target x GEA)</b>	2% x 133.25 = 2.67
<b>Payment in lieu required (floorspace target x £2,650)</b>	2.67 x £2,650 = £7,075.50

## 7.0 CONCLUSION

- 7.1 The Proposed Development is for “*change of use of the building to provide 2 residential units*” in the form of two duplex dwellings at the Site.
- 7.2 The Proposed Development would result in the repurposing of the vacant building which is considered redundant office stock, no longer viable or appropriate for continued office use.
- 7.3 The Proposed Development would also result in an uplift to the existing building through the removal of the existing uPVC conservatory which is of low architectural merit, and which has a detrimental impact on the wider Conservation Area.
- 7.4 The proposed dwellings will comply with minimum internal standards, and provide good quality accommodation for prospective occupants. The Proposed Development would therefore contribute to the Borough’s ascribed housing targets by providing a quantum of housing on a windfall site.
- 7.5 The Proposed Development positively responds to the Council’s adopted local plan policies pertaining to quality urban design and neighbourly development, would not adversely impact on the significance of the adjacent heritage asset and consequently the presumption in favour of granting planning permission is met and planning permission should be granted without delay in accordance with paragraph 14 of the NPPF.