

**Lupus House, 11-13 Macklin Street**

**Planning Statement**

**May 2019**

**DP9 Limited**

DP9 Ltd  
100 Pall Mall  
London  
SW1Y 5NQ  
Tel: 020 7004 1700  
Fax: 020 7004 1790

---

## CONTENTS

1.	INTRODUCTION .....	3
2.	SITE CONTEXT .....	5
3.	THE PROPOSED DEVELOPMENT .....	11
4.	PLANNING POLICY FRAMEWORK .....	13
5.	APPLICATION PROPOSALS .....	16
6.	PLANNING OBLIGATIONS & SECTION 106.....	26
7.	CONCLUSIONS .....	28

## 1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by DP9 Limited in support of an application made by Mr V Woolf and Mrs Y Woolf (hereafter referred to as the 'Applicant') for full planning permission for the extensions to the existing building known as Lupus House, at 11-13 Macklin Street (hereafter referred to as 'the Proposed Development').
- 1.2 The Application is submitted to the London Borough of Camden (hereafter referred to as 'LBC') and sets out the planning case in support of the proposals in the context of relevant national, regional and local planning policy guidance.
- 1.3 The Proposed Development seeks to provide a reconfiguration and increase of both the existing office and residential floorspace at the site. The description of the Proposed Development is set out below:

*"Extensions and external and internal alterations, including a revised layout to the office and residential entrances and floorplans to provide continued office (B1) and residential (C3) floorspace along with the use of part ground floor and mezzanine for flexible office and retail use (Use Class B1(a) and A1) and associated works".*

### Supporting Information

- 1.4 This Statement should be read in conjunction with the accompanying drawings and accommodation schedules, prepared by BD Partnership, submitted as part of the Application, as well as the following documents:
- Cover Letter, prepared by DP9 Limited;
  - Application Form and Certificates, prepared by DP9 Limited;
  - Community Infrastructure Levy Additional Information Form, prepared by DP9 Limited;

- 
- Design and Access Statement, prepared by BD Partnership;
  - Daylight and Sunlight Assessment, prepared by Rights of Light Consulting;
  - Heritage Report, prepared by Landscape Collective;
  - Transport Statement, prepared by TTP; and
  - Noise Assessment, prepared by Sandy Brown.

### **Structure of this Statement**

1.5 This Statement provides an overview of the Application Site and the Proposed Development and sets out a justification for the development. The Planning Statement takes the following form:

- Section 2 provides a description of the Application Site and the surrounding context;
- Section 3 sets out a summary of the Proposed Development;
- Section 4 assesses the Proposed Development against relevant planning policy;
- Section 5 sets out the Draft Section 106 Heads of Terms; and
- Section 6 sets out the overall conclusions.

### **Pre-application Discussions**

1.6 The final application proposals are as a result of the engagement with LBC. The Project Team met with officers on 27 March 2019. Following the meeting additional work has been carried out regarding the detailing of the Macklin Street elevation. Further detail is set out in the Design and Access Statement.

---

## 2. SITE CONTEXT

- 2.1. The Site is located within the administrative boundary of LBC, close to the boundary between LBC and Westminster City Council, The Site is located in the centre of Macklin Street within the Central Activities Zone.
- 2.2. The Site is currently occupied by a substantial five storey commercial building, comprising ground retail/sui generis uses plus three levels of office floorspace and fourth floor residential properties.
- 2.3. The building has frontage to Macklin Street and to the rear of the site abutting 31 Stukeley Street (International House). Its frontage is read as four storeys of London stock brick, the ordered fenestration which marks the building as a commercial structure carries arched red brick window heads, which add contrast. The façade of the building is centred around a bay entrance ascending to a simple pediment which is flanked by chimney stacks. The building is constructed in a U- shape facing southwards.
- 2.4. The building has been heavily altered internally to accommodate changing use. The most significant external alterations are at ground floor of the Macklin Street elevation.
- 2.5. The existing layout is significantly compromised with a sole point of entry to both the office and residential uses. The ground floor entrance is heavily constrained with a stair case presented immediately upon entry. Presently there is no at grade access for disabled users with the secondary core with service lift and staircase located to the rear of the building.
- 2.6. The office floorplate at each level is significantly constrained and unappealing as it presently does not facilitate growth of businesses due to the U-shape plan. In addition, there is a significant under provision in service facilities i.e. toilets and no dedicated cycle store, showers or bin store.

- 
- 2.7. The residential component at fourth floor comprises four residential properties providing 3 one-bedroom units and one two-bedroom unit. There is no lift access to the fourth floor, with the lift terminates at third floor level. In addition to this, all residential units fail to meet the modern minimum space standards and have a compromised floorplan and have no private amenity. A shared terrace for access is provided but is currently unused by all tenants.
- 2.8. The building is unlisted. However, the Site is located within the Seven Dials Estate Conservation Area and is identified as a positive contributor to the townscape and character and appearance of the conservation area.
- 2.9. Vehicular and pedestrian access to the Site is via Macklin Street only.
- 2.10. The Site is well served by public transport with a public transport accessibility level (PTAL) of 6b (Excellent). The Site is located within walking distance of numerous London Underground Stations (including Holborn, Covent Garden and Chancery Lane) and Transport for London Bus Stops.
- 2.11. According to the Environment Agency's (EA) flood zone maps, the Site lies within Flood Zone 1. As such no Flood Risk Assessment is submitted with the application, as land within Flood Zone 1 has a low probability of flooding.

### **Surrounding Context**

- 2.12. The surrounding context comprises a mixture of land uses and heights. The Site is located within proximity of St Giles Almshouses (Grade II Listed). The following buildings are considered as positive contributors to the townscape and the character and appearance of the conservation area:
- Wimbledon House,
  - Powis House,
  - St Joseph's RC School,

- 
- Macklin Street 1-7 odd, 9-11, 13, 15
  - Stukeley Street 4, 6, 8, 10, 12, 14

### **Planning History**

2.13. The Site has a limited planning history which is set out below:

- PS9904243 – The continued use of part ground floor (formerly office use (Class B1)) as a combined cycle park and shop use (sui generis) (approved 12.03.1999).
- 8400284 – Alterations to the ground floor frontage (approved 10.02.1984).
- TP/44819/10149 – The erection of a reinforced concrete staircase enclosure at Nos. 11 and 13 Macklin Street, Holborn (approved 27.07.1960).

2.14. In addition to the site-specific planning history, recent relevant planning history on neighbouring sites includes:

- 23 Macklin Street (2017/3986/P) – Variation of condition 3 (approved plans) of planning permission 2013/8263/P dated 18/06/2014 (for erection of rear first floor balcony, introduction of new windows and alterations to the front facade of dwelling), namely increasing size of first floor balcony at rear and size of approved windows at first floor in front elevation and conversion of two residential units into single dwelling house.
- 23 Macklin Street (2013/8263/P) – Erection of rear first floor balcony, introduction of new windows and replacement of door to entrance, also; internal alteration to include new stairs and re-instatement of fireplaces.

- 
- 21 Macklin Street (2013/7568/P) – Amendment to planning permission dated 25/01/2013 (Ref: 2012/4429/P) for change of use from office (Class B1) to 3 flats (Class C3), with mansard roof extension, roof terrace and associated alterations, namely alterations to front roof pitch, insertion of window at basement lightwell and alteration to layout of flat at ground and lower ground floors.
  - 21 Macklin Street (2012/4429/P) – Change of use from office at basement and ground floors (Class B1) and maisonette on upper floors (Class C3) to three residential units (1x 3-bedroom maisonette, 1x1 bedroom maisonette and a studio flat) (Class C3) including erection of a mansard roof extension at 4th floor, rear extension at 4th floor and provision of roof terraces at 2nd and 5th floor levels and alterations to fenestration.
  - 15 Macklin Street (2013/0402/P) – Variation of Condition 11 (development to be carried out in accordance with the approved plans) pursuant to planning permission granted on the 31/10/2011 (ref: 2011/4292/P for alterations and extension to include two storey glazed roof extensions above no. 17, alterations to the front and rear fenestration including creation of a new opening and the erection of a plant enclosure at roof level of no. 15 in association with the refurbishment and extension of existing office accommodation), to allow for minor material amendment to include a lift overrun, smoke vent hatch and additional ductwork at roof level.
  - 15 Macklin Street (2011/4292/P) – Alterations and extension to include two storey glazed roof extensions above no. 17, alterations to the front and rear fenestration including creation of a new opening and the erection of a plant enclosure at roof level of no. 15 in association with the refurbishment and extension of existing office accommodation.



- 
- 9 Macklin Street (2004/1169/P) – The change of use from office (use class B1) and warehouse (use class B8) to a mixed residential (use classes C3) and office (use class B1) together with the erection of a roof extension in association with the creation of 7 residential units (i.e. 1x1, 4x2 and 2x3 bedrooms) and installation of new double-glazed windows to existing openings and a new door to the ground floor.
  - 8 & 10 Stukeley Street (2017/5657) – External and internal alterations including revised layout to office and residential entrance area, internal layout changes to office floorplans over basement and ground floors to relocate staircase and passenger lift, omit basement bathroom, omit internal void within office space at ground floor level, two skylights consolidated into 1 in roof of ground floor rear extension, changes to the residential floorplans over basement to second floors including reconfiguration of basement bedroom and bathroom, addition of internal void within residential unit at ground floor level, internal staircase reconfigured between ground and first floor and first floor bedroom relocated to second floor level and installation of new access hatch to the roof of no. 10 to planning permission granted under reference 2015/7028/P granted on 31/01/2017 for erection of replacement mansard roof extension at no. 8 and installation of new mansard roof extension at no. 10; excavation of a single storey basement extension including lightwell to create additional Class B1 office floorspace; change of use of the ground floor of no. 8 from office to residential associated within the enlargement and reconfiguration of the two 1 bed residential units to create two 2 bed flats; alterations to the ground floor front and rear elevations; erection of first floor rear extension, and creation of external terrace at basement and first floor levels at no. 10.
  - 18 Stukeley Street (2012/2401/P) – Erection of a mansard roof extension to create additional accommodation with a new roof terrace along the

---

south-west elevation; change of use of the basement, first, second and third floors from office (Class B1) to residential (Class C3) with the provision of 2 x 1 bed and 1 x 3 bed flats at basement, first, second, third and fourth floor levels; change of use of the ground floor from office (Class B1) to a flexible use for office (Class B1) or education/community use (Class D1); and alterations to the fenestration along the front (north-west) and side (south-west) elevations at ground floor.

- 16 Stukeley Street (2006/3798/P) – Extensions, external alterations and change of use from non-residential use (Class D1) to mixed use office / non-residential use (Class B1/D1) on the lower ground and mezzanine ground floor levels and residential use (Class C3) on the upper ground and first to fifth floors creating 10 self-contained units (4x1 bed, 4x2 bed and 2x3 bed units), and formation of roof terraces at third, fourth, and fifth floor levels.

---

### 3. THE PROPOSED DEVELOPMENT

3.1 This Section should be read in conjunction with the Design and Access Statement, which describes the principal components of the Proposed Development and its design approach, and the Heritage Statement which sets out the Proposed Development's relationship with surrounding context, townscape and heritage.

3.2 Full planning permission is sought for:

*“Extensions and external and internal alterations, including a revised layout to the office and residential entrances and floorplans to provide continued office (B1) and residential (C3) floorspace along with the use of part ground floor and mezzanine for flexible office and retail use (Use Class B1(a) and A1) and associated works”.*

3.3 The Proposed Development seeks to deliver an increase in office and residential floorspace on the site through extensions and reconfiguration of the existing floorplans and cores.

3.4 Full details of the proposals can be found within the Design and Access Statement. However, we provide an overview below:

- Infilling the rear lightwell at ground to third floors to create additional floorspace for the existing uses.
- Replacement of the roof to create an additional storey with enlarged floor to ceiling heights to the residential.
- Alterations to the fenestration of the buildings.
- Reinstatement of the arched entrances at ground floor level.

- 
- Providing independent vertical circulation within the building for each use, i.e. commercial and residential.
  - Extending the lift to the residential uses, presently the lift terminates at third floor.
  - Provision of a new stair and lift core for the commercial units along with WC and shower provisions on each floor. There are currently no shower facilities within the building and toilet provision is not provided on each floor.
  - Provision of a reception lobby for the office use. This will include the provision of a ground floor DDA toilet, lift and stair core and bicycle storage for the office occupiers.
  - Bikes storage and bin stores will be provided on the ground floor for each use. Presently, there is no provision for bicycles within the building. Waste is kept in the rear of the building in the hall wall at ground floor adjacent to the rear secondary core.

---

## **4. PLANNING POLICY FRAMEWORK**

- 4.1 This Section of this Statement sets out the national, regional and local planning policy context relevant to the determination of this Application.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.3 The adopted Development Plan comprises saved policies of the LBC Local Plan, adopted 2017; and both the Minor Alterations (2016) and Further Alterations to the London Plan (2015), The Spatial Strategy for London consolidated with alterations since 2011 (hereafter known as ‘The London Plan’).

### **Regional Planning Policy and Guidance**

- 4.4 The London Plan is an expression of national policy, tailored to meet London’s planning priorities.
- Policy 2.10 (Central Activities Zone – Strategic Priorities) – enhance and promote the unique international, national and Londonwide roles of the Central Activities Zone (CAZ), supporting the distinct offer of the Zone based on a rich mix of local as well as strategic uses.
  - Policy 2.11 (Central Activities Zone – Strategic Functions) – ensure that development proposals increase office floorspace within the CAZ.
  - Policy 3.5 (Quality and Design of Housing Developments) – housing developments should be of the highest quality internally and externally.

### **Local Planning Policy**

- 4.5 The Development Plan for LBC comprises the LBC Local Plan which was adopted in 2017.

- 
- 4.6 Alongside the Development Plan, LBC have published a range of Camden Planning Guidance notes, these cover a wide range of topics, inter alia, design, housing, developer contributions.
- 4.7 The revisions to the National Planning Policy Framework (NPPF), were published in July 2018. The NPPF sets out Central Government's planning policy for England and how these are expected to be applied. It is supported by the National Planning Policy Guidance (NPPG), launched as an online resource in March 2014 and updated regularly. The NPPG seeks to provide further detail, clarification and guidance on national policy contained within the NPPF.
- 4.8 The NPPF The NPPF sets out a presumption in favour of sustainable development (Para 11). This means that development which is sustainable should be approved without delay. The guidance is referred to within the accompanying supporting application documents where relevant and appropriate.
- 4.9 The NPPF also states the importance of identifying opportunities for business growth in particular areas (Para 80). Furthermore, the NPPF emphasises the effective use of land and make as much use as possible of previously developed or brownfield land (Paragraph 117).

#### **Planning Policy Designations**

- 4.10 The Site benefits from a limited number of site-specific designations, as follows:
- within the Central Activities Zone;
  - located within Seven Dials Conservation Area; and
  - within proximity of secondary protected frontages.

---

### **Emerging Planning Policy Framework**

- 4.11 The GLA is in the process of preparing a new London Plan. The draft London Plan was consulted on between December 2017 and March 2018. The current timetable schedules the Examination in Public (EiP) of the New London Plan for Spring 2019 with the final London Plan being adopted in Autumn 2019.

---

## 5. APPLICATION PROPOSALS

- 5.1 This Section assesses the principle of the Proposed Development at Lupus House against the relevant Development Plan Policies, grouped into key topic areas as set out below:

### **Principle of Development**

- 5.2 Local Plan Policy G1 notes that the Council will create the conditions for growth to deliver the homes, jobs and infrastructure to meet Camden's identified needs. It goes on to note that Camden will do this by securing high quality development and promoting the most efficient use of land and buildings by, supporting development that makes best use of its site and expecting the provision of a mix of uses where appropriate.
- 5.3 The Policy identifies that the Plan seeks to meet Camden's objectively assessed needs to 2031 for 695,000 m<sup>2</sup> of office floorspace, 16,800 additional homes and circa 30,000 m<sup>2</sup> of retail floorspace.
- 5.4 The site is not located within a Core Growth Area, however the supporting text to Policy G1 notes that significant elements of Camden's growth will be delivered in highly accessible locations such as Central London. It goes on to states that this area is considered to be generally suitable for a range of land uses, including those that attract a larger number of journeys and for high density development that will help deliver growth in Camden.

### **Office**

- 5.5 The Proposed Development seeks to deliver 2,310m<sup>2</sup> (GIA) of office floorspace which aligns with the existing provision.



- 
- 5.6 The Proposed Development includes the demolition of the existing ground floor rear extension and comprises the erection of a new 4 storey extension and refurbishment and internal reconfiguration of the office floorspace.
- 5.7 The new office accommodation will be a significant improvement upon the existing provision, providing larger, flexible floorspace that is more suited to the needs of today's office occupiers. In addition, ancillary facilities such as WC's and showers will be provided on each level.
- 5.8 The site is located within the Central Activities Zone ('CAZ') which supports, and is the primary focus of, the provision of additional office floorspace. This is supported by policy at both local and regional level.
- 5.9 London Plan Policy 2.11 seeks to ensure that development proposals to increase office floorspace within CAZ include a mix of uses.
- 5.10 London Plan 2.13 notes that development proposals within opportunity areas and intensification areas should seek to optimise non-residential output and densities, provide necessary social and the infrastructure to sustain growth and where appropriate contain a mix of uses. It goes on to note that proposals should contribute to meeting the minimum guidelines for housing and/or indicative estimates for employment capacities.
- 5.11 Local Plan Policy E1 seeks to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residential and businesses. The policy notes, among other aspirations, to:
- Maintain a stock of premises that are suitable for a variety of business activities, for forms of differing sizes; and

- Direct new office development of the growth areas, Central London...in order to meet the forecast demand of 695,000 m<sup>2</sup> of office floorspace between 2014 and 2031.

5.12 Local Plan Policy E2 notes that the Council will encourage the provision of employment premises and sites in the borough, particularly those within the CAZ. The policy also notes that the Council will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided that the level of employment floorspace is increased or at least maintained.

5.13 In conclusion, the Proposed Development seeks to increase the quantum and quality of permanent office floorspace and fully accords with Development Plan policies LBC Policy E1 and E2 and London Plan Policy 4.2.

### **Retail Floorspace**

5.14 London Plan Policy 2.10 seeks to support and improve the retail offer of the CAZ for residential, workers and visitors.

5.15 Policy TC1 notes that the Council will focus new shopping and related uses in Camden's designated Growth Areas and Town Centre, having regard to the level of capacity available in these locations.

5.16 The Proposed Development will include flexible ground floor office and retail floorspace. The retail offer fronts Macklin Street. Although the site is not located within a Growth Area or Town Centre, the quantum of retail proposed is minimal. The proposed retail use will provide improved activation, enhancing the pedestrian environment and creating a more inviting space whilst also providing an improved retail offer to local workers and the community.

5.17 The retail floorspace accords with the requirements of the NPPF and the London Plan.

---

### **Residential Use**

- 5.18 The Proposed Development seeks to alter the existing residential floorspace on within the existing building and provide an uplift in quantum of overall floorspace to enhance the quality of the resultant homes.
- 5.19 The revised residential units will replace the existing sub-standard apartments that are small, have low head room, have poor levels of daylight provision, and are accessed via a staircase shared with the commercial floorspace.
- 5.20 The new units will provide accommodation that complies with the London Plan minimum space and design standards regarding size and floor to ceiling height. The apartments will also benefit from enhanced daylight provision and will each be provided with private external amenity space.

### **Acoustics**

- 5.21 The London Plan notes that future development proposals should manage noise through avoiding significant adverse noise impacts as a result of new development and during construction (Policy 7.15). The Draft London Plan reiterates that developments should consider how to moderate their noise impacts during construction and use once operational (Draft Policy D12 and Draft Policy D13).
- 5.22 A Noise Impact Assessment has been prepared by Scotch Partners to provide a noise assessment in relation to the Proposed Development. An environmental noise survey was carried out to establish the background sound levels around the site and by nearby noise sensitive premises and ambient and maximum noise levels at the Site.
- 5.23 The representative measured background sound levels were LA90,15min 52 dB during the day, and LA90,15min 46 dB during the night. Based on the requirements of London Borough of Camden, all plant must be designed such

that the cumulative noise level at 1 m from the worst affected windows of the nearby noise sensitive premises on the front of the site (Macklin St windows of 1-7 Macklin St) does not exceed LAeq 42 dB during the daytime and LAeq 36 dB during the night. Plant must also be designed such, that the cumulative noise level at 1 m from the worst affected windows of the nearby noise sensitive premises at the rear of the site (Stukeley St windows of 1-7 Macklin St) does not exceed LAeq 38 dB during the daytime and LAeq 32 dB during the night. It is expected that the details of the plant and noise levels resulting from this will be controlled via condition.

5.24 An initial assessment has been carried out to determine required acoustic performances for the facades and provide guidance on the ventilation strategy. The highest facade sound insulation performance required is  $R_w+C_{tr}$  23 dB. This can be achieved using standard double glazing, which typically achieves sound insulation performance of around  $R_w+C_{tr}$  28 dB. A solid screen is proposed for the eastern outdoor terrace to reduce potential annoyance from the existing neighbouring plant. The screen is expected to ensure the ambient noise level on all outdoor terraces are less than LAeq 50 dB therefore and align with the BS 8233 recommended criteria.

5.25 The analysis of the proposed mitigation and noise levels demonstrates that noise emissions will be compliant with the anticipated expectation of LBC, and shall therefore have no adverse impact on residential amenity of both future occupiers and residential properties in the vicinity.

### **Daylight & Sunlight**

5.26 Daylight, sunlight and overshadowing assessments of the Development have been carried out in accordance with the BRE Guidelines by Rights of Light Consulting and their findings are set out in detail within the accompanying Daylight and Sunlight Report.

- 
- 5.27 Policy 7.6 of the London Plan requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings in relation to a number of factors, including overshadowing. Draft London Plan Policy D8 reiterates the importance of ensuring that tall buildings do not compromise the comfort and enjoyment of neighbouring residential properties and open spaces to new development.
- 5.28 Local Plan Policy A1 noted that the Council will seek to protect the quality of life of occupiers and neighbours, which includes in respect of sunlight, daylight and overshadowing.
- 5.29 The Daylight and Sunlight Assessment considers all the residential properties potentially likely to be affected by the proposed development. The Daylight and Sunlight Assessment assesses the impact of the development on the light receivable to the neighbouring properties at 12, 14 & 16 Stukeley Street, 1 to 6 Powis House and 2, 9 & 10 to 14 Macklin Street.
- 5.30 The Assessment concludes that the Proposed Development will have a low impact on the light receivable by its neighbouring properties and complies with the BRE Guidelines.

### **Heritage**

- 5.31 Section 16 of the NPPF deals with conserving and enhancing the historic environment. It applies to the heritage-related consent regimes under the Planning (Listed Buildings and Conservation Areas) Act 1990, plan-making and decision taking.
- 5.32 London Plan Policy 7.8 states that 'Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural details'. This is reiterated in Policy D2 outlines that in order to maintain the character of Camden's Conservation Areas

---

the Council will not permit development that causes harm to the character and appearance of that conservation area.

5.33 A full assessment of the impact of the Proposed Development on neighbouring heritage assets can be found in the Setting, Townscape and Heritage Statement, prepared by Landscape Collective, which accompanies this Application.

5.34 Section 1 of the Setting, Townscape and Heritage Statement sets out the Heritage Receptors surrounding the Site which includes the Seven Dials Estate Conservation Area, St Giles Almshouses (statutory listed building) and locally listed buildings which are positive contributors to the conservation area, which include Lupus House (11-13 Macklin Street).

5.35 The significance of a heritage asset is defined in Annex 2 of the NPPF as being made up of four main constituents, architectural interest, historical interest, archaeological interest and artistic interest. Section 4 of the accompanying Setting, Townscape and Heritage Statement evaluates the significance of each heritage asset. Section 5 considers the potential impacts as result of the Proposed Development and this is summarised as follows:

- Lupus House as a Non-Designated Heritage Asset: The primary influence of Lupus House as a positive contributor to the character and appearance of the Seven Dials Estate Conservation Area. The rear elevations are subservient, heavily altered, and hidden in any public views by International House. The infilling extension and roof extension of the building will be hidden from view. It is immediately abutted by International House. Views are glimpsed beyond from the passage adjacent to International House. However, this is incidental view of the rear of the property limited by the dense urban form and massing of the buildings. The roof extension, as far as it can be appreciated, will read as part of the varied roof-scape and existing urban grain. The architect's proposals for the new build elements and changes to the Macklin Street

---

façade are based on extensive contextual analysis which has resulted in the Proposed Development integrating into its historic context, whilst retaining and enhancing the important aspects of the historic environment. The changes to the Macklin Street façade are considered to be a significant heritage benefit.

- Seven Dials Estate Conservation Area: There will be no impact on the architectural interest of Seven Dials Conservation Area. The rear of the building is of negligible importance due to its low visibility from the public realm, level of alteration from original form and proximity to modern additions. Remodelling of the rear of the structure and the roof extensions will be a low level of change which will have no impact and therefore preserve the existing character and appearance of the conservation area. As evidenced in Section 3 of this Statement, there have been numerous applications within both Macklin Street and the wider immediate context which have undergone both infill and roof extensions. The extensions demonstrate that the conservation area can undergo change without causing harm to its character and appearance. The wider architectural interest of the conservation area will not be harmed. This comprises buildings of different styles and scales that are set within their historic plots forming a pleasingly disparate whole.
- Setting and significance of nearby listed buildings: St Giles Almshouses and Walls and Railings (Grade II, List UID: 1113093) will not be physically affected by the proposed development, nor will the setting of these be affected by the Proposed Development. The setting of the buildings comprises the tight urban grain of the area. This remains unaffected by the Proposed Development.
- Setting and significance of nearby non-designated heritage assets: Due to the density of the existing urban form, lack of inter-visibility or causal links,

the effect of the proposals on the nearby Non-designated heritage assets will be negligible. Extension at the rear of the building will not meaningfully impact either way on the positive contribution made by the locally listed buildings on the character and appearance to the local townscape or conservation area.

5.36 The proposal responds to its location and offers minimal interference to the existing streetscape and character and of Macklin Street. The remodelling of the interior, addition of additional space by infilling the U-shape of the building, and roof extension will have no effect on the interpretation/experience or significance of the nearby designated heritage assets identified within this report.

5.37 Paragraph 200 of the NPPF states that: *“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and 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 the asset (or which better reveal its significance) should be treated favourably”*. As noted in the assessment by Landscape Collective, the Proposed Development provides additional floorspace which results in positive change to the Macklin Street elevation whilst not compromising the buildings heritage significance or significance and setting of the neighbouring heritage assets or Seven Dials Estate Conservation Area.

### **Transport, Parking and Servicing**

5.38 The NPPF requires new developments to consider local transport capacity and promote sustainable transport choices. The London Plan promotes development that will not adversely affect safety on the transport network.

5.39 Policy T1 of the Local Plan seeks to promote sustainable transport by prioritising walking, cycling and public transport in the borough.



- 
- 5.40 In line with London Plan Policy 6.3 the application is supported by a Transport Statement prepared by TTP which assesses the impact of the redevelopment of the site on the existing local road network.
- 5.41 The Proposed Development is not expected to result in material increase in total person trips and as such it is considered that the Proposed Development will not result in an impact on the local road and public transport networks. The increase in floorspace is not expected to result in a noticeable change in deliveries, all activity would continue to take place on-street as per the existing situation.
- 5.42 The current building does not have provision for independent refuse stores. The new scheme provides a new refuse store accessed via the Macklin Street elevation. It is expected that the change will be a benefit and will not materially change the existing on-street collection in the existing arrangement.
- 5.43 Cycle parking is to be provided in accordance with Draft London Plan requirements in a secured cycle store. Office parking will be located within a secure cycle store at ground floor level in the core of the building. A residential cycle store will also be provided at ground floor level. Cycle parking for the retail units is likely to be accommodated within each unit. The provision of dedicated cycle stores is a significant enhancement as presently there are no cycle stores within the existing building. This is a significant benefit compared with the existing building where there is a nil provision of cycle stores.
- 5.44 Pedestrian access will be maintained from Macklin Street. However, new entrances to each use will be provided with greater widths and lifts to ease circulation within the building.
- 5.45 Therefore, the Proposed Development is not expected to result in any material transport related impacts. Therefore, the Proposed Development meets the test of Paragraph 109 of the NPPF.

## 6. PLANNING OBLIGATIONS & SECTION 106

6.1 In respect of the negotiation of planning obligations associated with development, Regulation 122 (2) of the Community Infrastructure Levy Regulations states that: A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is –

- a) *“Necessary to make the development acceptable in planning terms;*
- b) *Directly related to the development; and*
- c) *Fairly and reasonably related in scale and kind to the development”.*

6.2 Paragraph 56 of the NPPF states that planning obligations should only be sought where they meet all of the tests outlined in Regulation 122 of the Community Infrastructure Regulations, as set out above.

6.3 Given the scale of the Proposed Development it is not expected that any Section 106 obligations are likely to be required.

### **Community Infrastructure Levy**

6.4 The setting of a London-wide Community Infrastructure Levy (‘CIL’) was a power given to the Mayor under the Planning Act 2008 designed to raise money for the infrastructure needed to develop an area. The Mayor formally adopted the CIL charging schedule on 1st April 2012. The Mayor formally adopted his second CIL charging schedule, known as MCIL2, on 1 April 2019. MCIL2 supersedes MCIL1 and the associated Crossrail Funding SPG.

6.5 MCIL2 is now payable on most new developments. For development schemes in the London Borough of Camden, the Mayoral CIL will be levied at £80 per m<sup>2</sup> (plus indexation) of uplift from existing to consented floorspace in lawful use and in accordance with the requirements of the CIL Regulations (as amended).

- 
- 6.6 LBC adopted their borough CIL charging schedule on 1 April 2015. CIL is levied at variable rates across the borough and is also dependent on the nature of the proposed uses. Borough CIL funds will pay for a wide range of infrastructure, which includes, but is not limited to; parks, schools, community facilities, health facilities and leisure centres.
- 6.7 A CIL Additional Information Requirement form has been completed and is included within the planning application submission.

---

## 7. CONCLUSIONS

7.1 This Planning Statement has been prepared by DP9 Limited to accompany an application for full planning permission on behalf of Mr V Woolf and Mrs Y Woolf for the proposed development at Lupus House.

7.2 Full planning permission is sought for the following:

*“Extensions and external and internal alterations, including a revised layout to the office and residential entrances and floorplans to provide continued office (B1) and residential (C3) floorspace along with the use of part ground floor and mezzanine for flexible office and retail use (Use Class B1(a) and A1) and associated works”.*

7.3 The planning application is submitted following pre-application engagement with LBC planning and conservation officers.

7.4 This Statement has demonstrated that the proposed development complies with the overall objectives of national, regional and local policy guidance, and in so doing, delivers a sustainable development of the site that will contribute to the supply of good quality office and residential floorspace in the Central Activities Zone.

7.5 The Proposed Development will deliver the following key benefits:

- Provision of xxx sqm additional office floorspace;
- Enhancement of the existing office accommodation through the reconfiguration of the floorplan of each office floor;
- Increased office floorplans which provide greater flexibility for subdivision/amalgamation to suit a wide variety of future tenant needs;
- The scheme enlivens the ground level street frontages with active uses;

- 
- Provision of two separate entrances and cores for the residential and office users;
  - Uplift in residential floorspace to provide four residential units which meet the minimum space requirements as required in the London Plan and provide private amenity space for all properties;
  - Enhancements to the Macklin Street elevation through restoration of the original arches at ground floor and the original symmetry of the fenestration;
  - Provision of disabled access to all uses; and
  - Provision of cycle parking facilities for all users.

7.6 The Proposed Development will have a beneficial effect on LBC in the long-term and will make efficient use of this brownfield site. The Proposed Development will not harm the

7.7 The Proposed Development preserve the special interests of the conservation area and offer an opportunity for enhancement. Redevelopment represents an appropriate design response to the heritage values of the site and area. As such, the Proposed Development will not harm the character and appearance of the Seven Dials Estate Conservation Area.

7.8 It is considered that the overall planning merits of the proposal as set out in this Statement demonstrates that the Council should favourably consider this planning application for approval.