

Charles Darwin House
The King's College of Our Lady of Eton beside Windsor otherwise known
as Eton College
November 2019



CHARLES DARWIN HOUSE PLANNING STATEMENT

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Bidwells LLP on behalf of our client The King's College of Our Lady of Eton Beside Windsor otherwise known as Eton College. It is submitted to the London Borough of Camden in their capacity as the Local Planning Authority (LPA) in support of a planning application which seeks full planning permission for works to Charles Darwin House, 12 Roger Street, London, WC1N 2JU.
- 1.2 In addition to this Planning Statement, the following drawings and documents support this application:
- Completed application form and ownership certificates;
 - Design and Access Statement prepared by Minifie Architects;
 - Heritage Statement prepared by Bidwells LLP;
 - CIL form;
 - Site Location Plan showing red line ownership (1:1250);
 - Site Block Plan (1:500);
 - Existing and proposed elevation plans (1:100);
 - Existing and proposed roof plans (1:100);
 - Materials schedule;
 - Copy of decision notice from previous plant application;
 - Acoustic report prepared by Holtz Acoustics;
 - Transport Assessment and Travel Plan prepared by Simpson;
 - Lighting details prepared by Atelier Ten;
 - Technical specification of proposed plant equipment, and
 - The application fee of £924

2.0 Application Site and Surrounding Area

- 2.1 Charles Darwin House is located at 12 Roger Street, within the London Borough of Camden. The site is a corner plot between Roger Street and North Mews, of which these roads form the northern and eastern boundaries respectively. The five storey building has a flat roof with an external stairwell core which provides access onto the roof.
- 2.2 The site area measures 16,888 sq ft (1,569 sq m) and is currently used as Use Class B1 Business - Offices. The building features a rear yard which has the capability of providing parking for three vehicles (albeit is not used as such), refuse and bicycle storage.
- 2.3 The building underwent a major refurbishment in 2010, following which it was awarded a 'BREEAM' excellent rating.

- 2.4 12 Roger Street is very well connected and as such has a Public Transport Accessibility Level (PTAL) rating of 6b (i.e., the highest possible level of accessibility). London Underground, Mainline and Thameslink stations are in close proximity, with three underground stations (Russell Square, Chancery Lane and Holborn) less than 0.5 miles away.
- 2.5 Adjacent properties along Roger Street, North Mews and Doughty Street include a mixture of residential and office uses. Building types include townhouses in small groups, mews buildings and later infill developments. This has resulted in an interesting variety of architectural styles, providing a sense of liveliness. Whilst there are variations in heights, there is a general consistency in the use of yellow stock brick with render, red brick or stone detailing or completely red brick.
- 2.6 The topography of the area means that the three-storey terraced dwelling houses to the west of the site on John Street, are on a higher gradient than the development site. The boundary treatment here consists of a wall approximately 6.5 meters in height.
- 2.7 Nos 10-20 are grade II listed and feature cast-iron railings with urn finials, which are also listed.
- 2.8 The site also lies within the Bloomsbury Conservation Area (sub area 10).
- 2.9 In addition, the property to the north of the site at 4 Roger Street is detailed as a 'Bloomsbury Positive Building', according to the Bloomsbury Conservation Area Townscape Appraisal Map.



- 2.10 A Heritage Assessment and Statement are included as part of this application.

3.0 Planning History

- 3.1 According to the online planning register, the history for the site is as follows:

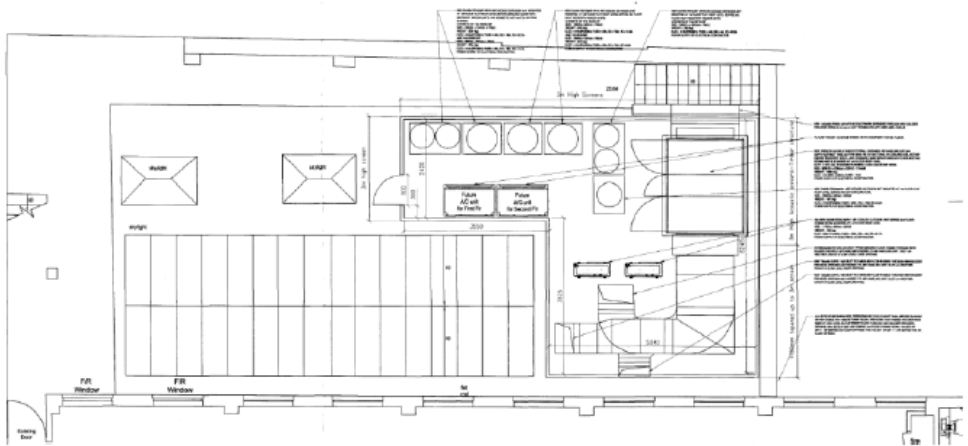
REFERENCE	DESCRIPTION	STATUS
17967	The use of part of the reinstated building at No. 12 Roger Street, Holborn, for office purposes	Approved on 22 February 1957

M15/24/B/17722	The partial rebuilding of No.12 Roger Street, Holborn, after war-damage as a part 4-storey and part 5-storey building for use for office and warehouse purposes.	Approved on 02 January 1958
M15/24/B/2177	The erection of a five-storey building on the site of No. 12 Roger Street, Holborn, for use as a warehouse on the ground floor and offices on the upper floors.	Approved on 02 May 1959
M15/24/B/9536	The erection of a boundary wall to the car park of a building of five storeys on the site of 12 Roger Street, Holborn, for use as a warehouse on the ground floor with offices over, as shop on plan submitted in accordance with condition (1) of the Council's permission dated 3 July 1958.	Approved on 29 July 1959
PSX0004872	The installation of 4 air conditioning plants at the rear first floor roof, as shown by drawing numbers 415-9-01, 415-9-02 and specifications of air conditioner/condenser unit and noise acoustic report (received on 14th September 2000).	Approved on 21 July 2000
2009/3025/P	Replacement of windows on all elevations including alterations to ground floor street entrance and rear courtyard entrance, replacement of roof lantern by new rooflights on 1 st floor roof; installation of replacement plant on 1 st floor flat roof with associated acoustic enclosure, and new plant on main 5 th floor roof.	Approved on 04 November 2009

Planning Application 2009/3025/P

- 3.2 The most relevant permission to this application is 2009/3025/P, which inter alia approved a new plant and a new plant enclosure on the roof of the 5th floor. Although this element of the proposal has not been built out (the old plant remains in situ), other parts of the consent; notably the change to the ground floor elevations have been, and the permission has therefore been implemented and remains extant, enabling the applicant to complete the roof enclosures should they so wish.
- 3.3 The officer report specifically states the following:
- “The acoustic enclosure is welcomed as it will hide the new plant from public views across the courtyard from Roger Street, as well as views from neighbouring premises in John Street. It will be clad in light grey metal panels to reduce its prominence and is considered acceptable in this location, being well setback from the street frontage and appropriate for this utilitarian context. The roof plant on upper levels will not be visible from the ground. The 4 replacement roof lights for the previous roof lantern is acceptable and has no impact on the building’s general appearance.”*
- 3.4 The Council’s on-line planning register shows an incomplete set of drawings however an approximate height of the approved structure can be calculated from the photomontage that was submitted with the application by taking references to existing key features.

3.5 It should be noted that this consent also granted permission for the enclosure and plant at first floor level, at the rear of the building. The first-floor plant area approved is shown in the following extract from the plans and the following photos the ‘as built’ arrangement:



Approved Plan (Extract)



3.6 With regards to the 1st Floor plant and enclosure the officer report states:

“The acoustic enclosure on the 1st floor will be surrounding all the plant and will have a screen 3m high and 10m long on the boundary adjoining John Street, eventually sloping down to 1m high next to the main block itself. It will be open to the sky. The enclosure will completely mask the ducting and exhaust of the air-handling unit from neighbouring properties. Although 1m higher than the existing boundary wall with 17 John St, it is only 0.5m higher than adjoining walls and railings of adjoining properties and in particular is approx 8m away from this property’s rear windows so that it does not cause any loss of outlook or daylight.”

4.0 Planning Policy Context

- 4.1 To the extent that development plan policies are material to an application for planning permission the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise. The key development plan documents include the Camden Local Plan (2017) and the London Plan (2016).

London Plan (2016)

- 4.2 The London Plan is the overall strategic plan for London which sets out “an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years”.
- 4.3 Chapters three to twelve of the London Plan cover topic-based policies and implementation. Of relevance to this proposal are the following policies:
- Policy 4.2 - Offices
 - Policy 5.1 - Climate change mitigation
 - Policy 5.3 - Sustainable design and construction
 - Policy 6.9 - Cycling
 - Policy 6.13 - Parking
 - Policy 7.4 - Local Character

Emerging London Plan

- 4.4 The draft version of the new London Plan recently underwent its Examination in Public (EiP) with the ‘consolidated’ version of the suggested changes published in July 2019. The Inspectors comments and recommendations were published in October 2019, recommending numerous amendments. Given this, the policies contained within the Consolidated Suggested Changes Version are considered a material consideration when assessing development proposals.
- 4.5 The plan promotes the concept of ‘Good Growth’ which recommends continued growth which is socially and economically inclusive and environmentally sustainable. Within this concept, Policy GG2, details that in order to create successful, mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land, prioritising Opportunity Areas, surplus public sector land, sites which are well connected by existing or planned Tube and rail stations, and sites within and on the edge of town centres.

Camden Local Plan

- 4.6 The Camden Local Plan is the statutory plan for Camden that must be followed alongside the London Plan. It was adopted in July 2017 and covers the period from 2016-2031.
- 4.7 The concept of economy and jobs is particularly relevant to this application, given that the site provides employment premises in the borough. There are two relevant economic policies within the Local Plan.
- Policy E1 Economic development
 - Policy E2 Employment premises and sites

- 4.8 Policy E1 outlines that the Council aims to secure a successful and inclusive economy, by supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 (below).
- 4.9 Policy E2 suggests that higher intensity redevelopment of premises or sites will be suitable provided that:
- the level of employment floorspace is increased or at least maintained;
 - the redevelopment retains existing businesses on the site as far as possible;
 - it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy and will be to a sustainable location;
 - the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;
 - the scheme would increase employment opportunities for local residents, including training and apprenticeships;
 - the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and,
 - for larger employment sites, any redevelopment is part of a comprehensive scheme.

Other relevant policies include:

- 4.10 Policy D1: Design - the Council will require development to respect the local context and character in terms of design and materials and be sustainable; incorporating best practice in resource management and climate change mitigation.
- 4.11 With regards to Heritage, Policy D2 confirms that development will be required to preserve or where possible enhance the character or appearance of the area.
- 4.12 Policy A1: Managing the impact of development – the Council will manage the impact of development and seek to protect the quality of life of occupiers and neighbours. The factors to consider will include visual privacy, outlook, sunlight, daylight and overshadowing.
- 4.13 Policy CC1: Climate change mitigation - the Council promotes zero carbon development and encourages energy efficiency improvements to existing buildings, with a view to minimising the effects of climate change.
- 4.14 Policy T1: Prioritising walking, cycling and public transport - the Council will promote cycling in the borough and ensure that development exceeds the minimum secure cycle parking facilities as detailed in the London Plan:
- Long stay – 1 space per 250 sqm
 - Short stay – 1 space per 1000sqm
- 4.15 Policy T2: Parking and car-free development – in order to assist in reducing air pollution, improve the attractiveness of the area for local walking and cycling, the Council will limit the availability of

parking, for those spaces designated for disabled people where necessary and or operational or servicing needs. Due to the scarcity of land as a resource, the development of parking spaces for alternative uses will be supported.

- 4.16 Policy C6: Access for all – in order to promote fair access for all, buildings will be expected to meet the highest practicable standards of accessible and inclusive design.

NPPF 2018 (Amended February 2019)

- 4.17 The NPPF (2018) is a material consideration that represents up-to-date government planning policy and must be taken into account where it is relevant to a planning application or appeal. If decision takers choose not to follow the NPPF, clear and convincing reasons for doing so are required. However, a development that is consistent with the NPPF does not remove the requirement to determine the application in accordance with the development plan unless there are other material considerations that indicate otherwise.
- 4.18 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 11 outlines that plans and decisions should apply “*a presumption in favour of sustainable development*”, which means that development proposals that accord with an up-to-date development plan should be approved without delay.
- 4.19 The NPPF outlines that where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.
- 4.20 A key principle of the NPPF is that planning policies and decisions should promote the effective use of land meeting the need for homes and other uses (paragraph 117). The NPPF continues stating that policies and decisions should:
- encourage multiple benefits from both urban land, including mixed use schemes;
 - give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs; and
 - promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained.
- 4.21 Chapter 6 of the NPPF sets out that planning decisions “*should help create the conditions in which businesses can invest, expand and adapt*”. It also suggests that significant weight be placed on the need to support economic growth, taking into account both local business needs and wider opportunities for development. This is particularly relevant in areas with high levels of productivity, which should be able to capitalise on their performance and potential.
- 4.22 Given the heritage assets within and surrounding the site, Chapter 16 of the NPPF is of paramount importance. When considering applications paragraph 192 states that local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them in viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

Other Material Considerations

- 4.23 A series of supplementary planning documents (SPD) have been produced by the Council to provide greater detail on strategic policies to support decisions on planning applications. These are considered within our appraisal where appropriate.

5.0 Proposed development

- 5.1 The proposed scheme would see the refurbishment of the existing building, to include the following works:

- External works to the façade and courtyard;
- Relocation of the plant to the roof to accommodate a first-floor flat roofed extension to the western elevation;
- New plant enclosure on the roof;
- A new cycle and bin store; and,
- Re positioning of the entrance to the existing courtyard.

- 5.2 Planning permission is therefore sought for:

Erection of first floor extension to western elevation, plant enclosure to roof, alterations to façade and relocation of main entrance.

- 5.3 This application is accompanied by the following supporting documents, consistent with the LB Camden's list of validation documents, and relevant to the submission being made:

- Completed application form and ownership certificates;
- Design and Access Statement prepared by Minifie Architects;
- Planning Statement;
- Heritage Statement prepared by Bidwells LLP;
- CIL form;
- Site Location Plan showing red line ownership (1:1250);
- Site Block Plan (1:500);
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- Materials schedule;
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6.0 Planning Considerations

Principle of development

- 6.1 The proposals involve modest extensions to a building in existing office use. The refurbishment, updating of the building and the intensification of use in this way is supported by policy. Policy E2, also supports increases in the level of employment floorspace.
- 6.2 The previously approved application 2009/3025/P forms a material consideration in the decision making process and has set a precedence with regards to the acceptability of both a plant enclosure on the roof and a new first floor extension on the western elevation. While this proposal includes a marginal increase in floor area, the enclosure is set further away from the edge of the building and therefore will not be as visible from the street scene below, as that already approved.
- 6.3 As the development does not exceed the 200sqm threshold detailed within Policy H2 of the Local Plan, there are no requirements for any self-contained residential accommodation at the site and the proposal is compliant with policy.

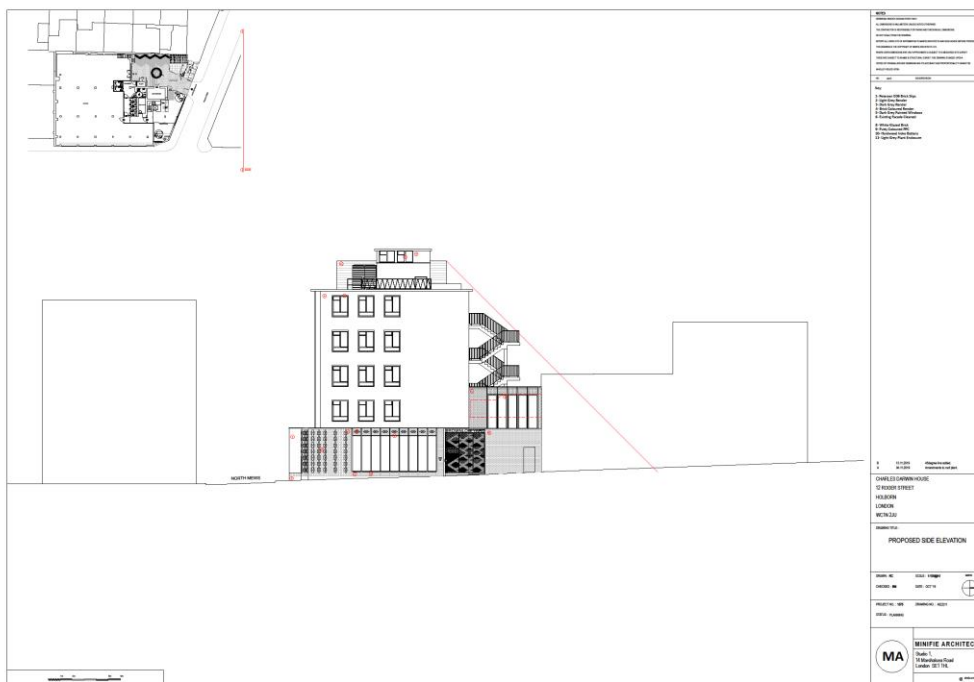
Design of development

- 6.4 The design of the proposed scheme accords with the criteria established in Policy D1 and the Design CPG (2019) document: it responds and integrates sensitively to its surrounding context, improves the appearance of the public realm and makes efficient use of the site. The brick slips and alterations to the northern boundary are respectful of the motif design on the existing wall on Roger Street and assist in integrating the rest of the building into the Conservation Area.
- 6.5 The removal of the plant enclosure on the western elevation will allow for the erection of first floor extension. It will not extend up to the boundary on the western elevation, leaving a separation distance of 1 metre. The flat roof adds a contemporary edge and assists in improving the view of the building from the street scene

Impact on neighbouring amenity

- 6.6 In line with Policy A1, the impact of the proposal has been considered. The height of the first floor extension extends only marginally over the solid wall which exists along this boundary with the residential properties to the west. There will however be no overlooking to the properties or their private amenity space.

- 6.7 The removal of the plant enclosure and plant on this elevation is considered to be an enhancement to the quality of life of the occupiers of these properties.
- 6.8 A Background Noise Survey and Plant Impact Assessment (October 2019) has been carried out as part of this application and confirms that the relocated plant equipment, to the roof in the space that already has consent under the 2009 consent, will not exceed the plant noise limits and therefore complies with national and local guidelines.
- 6.9 In line with Policy A1 and the Amenity CPG document, the impact of the proposed plant enclosure on the surrounding properties has been considered. A 45 degree elevation test has been carried out (shown below) and while the enclosure may result in some overshadowing to the rear of the private amenity space serving these properties, there will be no loss of light to any windows.



- 6.10 Similarly, the presence of the existing brick wall and the level changes between the site and the neighbouring properties will ensure that the first floor extension will not affect daylight and sunlight levels to the neighbouring properties.
- 6.11 Lighting is proposed to the courtyard development of the scheme, details of which are supplied with this application. The design has taken into account the surrounding environment and has been designed in order to reduce light pollution and light spill beyond the courtyard. All of the luminaires specified in the design have also been chosen to reduce the amount of light spill to the sky. Any fitting which includes an element of upward light, has been sited to minimise upward waste light.
- 6.12 In addition to this, the external lighting scheme will be switched via a photocell & timeclock.

Heritage

- 6.13 The Heritage Statement which accompanies this application identifies the relative value of the heritage assets and considers the potential impact of the proposals on their significance, including the contribution made by their setting.
- 6.14 The report concludes that the site's courtyard entrance, which allows for views into the plot again is uncommon and the form of the courtyard itself is considered to detract from the surrounding Conservation Area. Overall Charles Darwin House is considered to make a neutral contribution to the Bloomsbury Conservation Area, although elements of the building are considered to detract.
- 6.15 With regards to the adjacent listed buildings, the existing plant enclosure and courtyard area which are visible, ensure a more industrial feel to the area, which is considered to detract from the setting of the terrace
- 6.16 On balance, the proposed scheme will have a negligible beneficial impact on the Bloomsbury Conservation Area and will have no physical impact or setting of the listed buildings.

Parking

- 6.17 The proposal will see the removal of three vehicular parking spaces currently situated within the courtyard area. The loss of these spaces and the re-provision for alternative use is in accordance with Policy T2.

Cycle Parking

- 6.18 In line with the London Plan requirements and the Policy T1 of the Local Plan, the new cycle store in the courtyard area proposes the storage of 22 bicycles under cover, with locking points and a dedicated lock to the store. This meets the requirement for new floorspace.

7.0 Conclusion

- 7.1 We believe that the development is compliant with national and local planning policy, for the reasons established in Chapter 6. Overall, the proposals will not negatively affect any residential or local amenity.
- 7.2 The site is located within a conservation area and situated amongst a row of listed buildings and listed railings. As such, thoughtful design and the associated materials have been proposed to ensure that the proposals are consistent with the nature of the surrounding area and will not result in harm to the designated heritage assets. This has been fully assessed in the accompanying Heritage Assessment.
- 7.3 The proposal adheres to Policy D1 which respects the local context and character in terms of design and materials. The development proposal is considered to enhance the setting of the conservation area and make a positive contribution to the setting.
- 7.4 Accordingly, the application is fully compliant with the statutory development plan, relevant material considerations, and does not impact residential amenity. It has had due regard to all

issues of national and local importance and accords with these. The Council is therefore requested to determine these proposals positively.



BIDWELLS