

DIORAMA ESTATE LIMITED

**THE DIORAMA, NO. 18 PARK
SQUARE EAST, LONDON, NW1 4LH**

PLANNING STATEMENT

**APPLICATION FOR FULL PLANNING
PERMISSION AND LISTED BUILDING
CONSENT**

FEBRUARY 2020

5 Bolton Street

London

W1J 8BA

Tel: 020 7493 4002

Fax: 020 7312 7548

www.montagu-evans.co.uk

CONTENTS

1.0	EXECUTIVE SUMMARY.....	1
2.0	INTRODUCTION AND BACKGROUND.....	3
3.0	APPLICATION SITE AND SURROUNDINGS.....	8
4.0	DEVELOPMENT PROPOSALS.....	15
5.0	PLANNING POLICY FRAMEWORK.....	18
6.0	PLANNING POLICY ASSESSMENT	22
7.0	CONCLUSIONS.....	47

1.0 EXECUTIVE SUMMARY

- 1.1 This Planning Statement forms part of the application for planning permission and listed building consent (“the Application”) submitted by No. 18 Diorama Estates Limited (“the Applicant”) to the London Borough of Camden (“LBC”) for the conversion and extension of the former Diorama, 18 Park Square East, London, NW1 4LH (“the Site” / “the Building”) to provide offices and associated works to the Building (**Section 2**).
- 1.2 The Site is the former Diorama, at no. 18 Park Square East, which is currently connected to adjacent buildings, nos. 17 & 19 Park Square East, which form separate applications. It is located within the London Borough of Camden on the private road, Park Square East, close to Regent's Park. (**Section 3**).
- 1.3 Built in the 1820s as a Diorama, the Building has a rich history with a number of varied uses throughout its lifetime, including a Baptist chapel and rheumatism hospital. It was most recently used for institutional offices, which vacated in 2013 (**Section 3**).
- 1.4 The subject buildings form part of a group listing relating to nos. 13-24 Park Square East (and attached) (The Diorama and Bedford College Annexe), which is Grade I listed. The Site is also located within the Regent's Park Conservation Area (**Section 3**).
- 1.5 The Scheme has been developed as part of Pre-Application discussions with the local planning authority and pre-submission consultation with ward councillors, local residents and stakeholders (**Section 6**).
- 1.6 The Proposals are part of a comprehensive submission to refurbish and extend the Grade I listed nos. 17, 18 and 19 Park Square East, which currently effectively form a single building, and to subdivide these back into three separate properties. The Proposed Development, alongside two other applications for the conversion of nos. 17 & 19 Park Square East, to residential townhouses, seeks to return the building backs into three independent buildings (**Section 4**).
- 1.7 The Scheme would provide for new and additional commercial floorspace in a highly accessible Central London location, further contributing to London's commercial aims through high quality and flexible space (**Section 6**).
- 1.8 The Proposed Development ensures that the Site is brought back into its optimum use through the creation of a high quality office building with modern and efficient floorplates and generating employment opportunities (**Section 6**).
- 1.9 The design would be of high quality that would be well-related to the surrounding context, including preserving and enhancing the conservation area's character and appearance and an enhancement to the significance of the listed building (**Section 6**).

- 1.10 Overall, the Proposed Development is in accordance with the national, regional and local planning policy, including other material considerations such as emerging policy and guidance. The Scheme would provide a number of planning benefits over and above the existing situation (**Section 7**)

2.0 INTRODUCTION AND BACKGROUND

- 2.1 This Planning Statement forms part of the application for planning permission and listed building consent (“the Application”) submitted by No. 18 Diorama Estates Limited (“the Applicant”) to the London Borough of Camden (“LBC”) for the conversion and extension of the former Diorama, 18 Park Square East, London, NW1 4LH (“the Site” / “the Building”) to provide offices and associated works to the Building.
- 2.2 The Proposals (“The Proposed Development” / “The Scheme”) follows on from previous application(s) by the freeholder, the Crown Estate, to convert this Grade I listed building into an alternative use. The existing building has been vacant since 2013.
- 2.3 The Proposals are part of a comprehensive submission to refurbish and extend the Grade I listed nos. 17, 18 and 19 Park Square East, which currently effectively form a single building, and to subdivide these back into three separate properties. The Proposed Development, alongside two other applications for the conversion of nos. 17 & 19 Park Square East, to residential townhouses, seeks to return the building backs into three independent buildings.
- 2.4 This Planning Statement covers the Application to convert the former Diorama, no. 18 Park Square East.

Planning Applications

- 2.5 This Planning Statement (“the / this Statement”) has been prepared to cover the Application for planning permission and listed building consent for No. 18 Park Square East, although should be read in conjunction with the other Statements, relating to the other properties, which are to be submitted concurrently.
- 2.6 This Application seeks to convert and extension of the central property (no. 18) to form a high quality, modern office building.
- 2.7 The second application, relating to no. 17 Park Square East, seeks its conversion back to a self-contained residential dwelling, returning it its former use as a townhouse and forming the northern flank to the Diorama.
- 2.8 Finally, the third application, relating to no. 19 Park Square East, also seeks the conversion of the property back to a self-contained residential dwelling, flanking the building on the south side.
- 2.9 Full details of the Proposed Development are set out in the separate Design and Access Statements that accompany each respective application, prepared by Marek Wojciechowski Architects (“MWA”).
- 2.10 The descriptions of development for the three Applications, which seek full planning permission and listed building consent in each instance, are as follows:

1. No. 17 Park Square East
 - *“Change of use from institutional use to residential (Class C3) to form a self-contained dwelling over B, G + 3 storeys, excavation of existing vaults, extension at ground floor level to provide a single storey rear extension, internal refurbishment and associated works.”*
2. No. 18 Park Square East
 - *“Change of use of building from institutional use (sui generis) to be used as Offices (Class B1a), extension at roof level to provide new third floor, internal subdivision, infilling, refurbishment and associated works.”*
3. No. 19 Park Square East
 - *“Change of use from institutional use to residential (Class C3) to form a self-contained dwelling over B, G + 3 storeys, excavation of existing vaults, extension at ground floor level to provide a single storey rear extension, internal refurbishment and associated works.”*

Pre-application Engagement

- 2.11 Historically, the freeholder, the Crown Estate, has undertaken extensive consultation with LBC and other stakeholders, during the design of their proposals for this and the adjoining Sites, which resulted in an application being submitted in 2014 (although this was never determined by LBC).
- 2.12 The new project team and Applicant has undertaken further consultation with LBC, from February 2018 onwards, which has informed the design of the Scheme, by addressing comments raised during this 25-month pre-application process.
- 2.13 Meetings were held with planning and design officers in March 2018, June 2019 and again in September 2019. Officers have issued written pre-application responses following each meeting and the Applicant has subsequently entered into a Planning Performance Agreement (“PPA”) to cover the pre-application and post-submission advice.
- 2.14 The pre-application consultation built upon separate discussions that the Crown Estate undertook with LBC both prior to and concurrently with the Applicant’s pre-application discussions. Many key parts of the Proposed Development had already been established through these discussions and planning history.
- 2.15 The Applicant’s pre-application discussions with LBC centred upon the proposed roof extension design, the treatment of the rear atrium and lightwell, and ideas for public engagement with understanding of the Diorama’s history.

- 2.16 The final scheme has been adapted following comments from LBC raised in pre-application meetings and subsequent written responses. The submitted scheme comprises a number of alterations which are set out within the Design and Access Statement.
- 2.17 The Proposed Development has also been informed by pre-submission consultation with ward councillors, local residents and other interested stakeholders, including meetings and presentations to the Regent's Park Conservation Area Advisory Committee (RPCAAC) on 7 October 2019 and with Historic England on 28 October 2019.
- 2.18 Full details of the pre-application consultation are set out in the Statement of Community Involvement (SCI), prepared by London Communications Agency (LCA).

Purpose and format of the Planning Statement

- 2.19 The purpose of this Planning Statement is to provide information to allow for an informed assessment of the Proposed Development against relevant national, regional and local planning policy and other material considerations.
- 2.20 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the Application have been taken into account. This Statement brings together the findings of the technical reports identified below and, having regard to these, provides a balanced planning assessment of the merits of the proposals.
- 2.21 The scope of supporting information has been established with regard to the national and local list requirements, alongside feedback during the course of pre-application engagement with LBC officers.
- 2.22 A Document Schedule has been prepared for each of the three applications. Table 1.1 confirms the project team responsible for each matter:

Table 1.1 – Schedule of Application Submission Documents

DOC REF	NAME OF DOCUMENT / FILE	AUTHOR
1.	Schedule DR-1: Document Schedule	Montagu Evans
2.	Cover Letter	Montagu Evans
3.	Application Form: Full Planning and Listed Building Consent	Montagu Evans
4.	Community Infrastructure Levy	Montagu Evans
5.	Schedule DR-2: Drawing Schedule	Montagu Evans
6.	Site Location Plan	MW-A
7.	Application Drawings (Existing, Demolition & Proposed)	MW-A
8.	Design and Access Statement	MW-A
9.	Planning Statement	Montagu Evans

10.	Heritage Statement	Bidwells
11.	Transport Statement (including Appendices)	Motion
12.	Framework Travel Plan	Motion
13.	Draft Construction Management Plan ProForma	Motion
14.	Acoustic Report	RBA
15.	Daylight and Sunlight Report	Hollis
16.	Basement Impact Assessment	CET
17.	Geotechnical Report on Ground Investigation	CET
18.	Phase 1 Preliminary Risk Assessment	CET
19.	Construction Method Statement (including structural drawings)	Form
20.	Flood Risk Assessment	Form
21.	Archaeological Desk-based Assessment	RPS
22.	Energy and Sustainability Statement	Cundall
23.	Air Quality Neutral Assessment	Cundall
24.	Construction Dust Risk Assessment	Cundall
25.	Fire Strategy	Cundall
26.	Statement of Community Involvement	LCA
27.	Photographic Survey	MW-A

2.23 This Planning Statement demonstrates that the overall Scheme would:

- Deliver sustainable development of brownfield land within Central London, in line with the overarching approach to development outlined in the NPPF;
- Deliver development that would contribute positively to the delivery of a mix of uses in Camden, consistent with its strategic objectives and the objectives at all tiers of planning policy;
- Provide for new and additional commercial floorspace in a highly accessible CAZ location and, further contributing to London's commercial aims through high quality and flexible space;
- Provide a mixed use development through the provision of office floorspace on this Site and subdividing parts of the building to form residential townhouses (subject to separate applications);
- Ensure that the Site is brought back into its optimum use, through the creation of a high quality office building with modern and efficient floorplates and spaces;
- Optimise the Site in providing additional employment opportunities with the generation of additional jobs and a mix of uses;

- Deliver a design of high quality architecture that would be well-related to the surrounding context, including preserving and enhancing the character and appearance of the conservation areas and setting of nearby listed buildings;
- Result in an enhancement to the significance of the listed building;
- Deliver a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the building;
- Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development which would promote other means of travel such as cycling and walking; and
- Ensure that a building, which has been vacant for nearly 7 years is brought back into use.

2.24 **Section 3** of this Statement provides background information on the Sites including its planning history. **Section 4** sets out details of the Scheme. **Section 5** summarises the planning policy relevant to the Site. The three Application proposals are assessed against these policies in **Section 6**. A summary and conclusions are contained within **Section 7**.

3.0 APPLICATION SITE AND SURROUNDINGS

Application Site

- 3.1 The Site is located within the administrative area of the London Borough of Camden ("LBC"). It is situated within the south west corner of the Borough, with Park Square East forming the boundary with the City of Westminster. The site area comprises approximately 0.1 ha (1032 sqm).
- 3.2 For the purpose of this Application, the Site is the former Diorama at No. 18 Park Square East. It is currently connected to both nos. 17 and 18 Park Square East applications for which have also been submitted today. A site location plan is enclosed within the application submission.
- 3.3 The Site is located within the Regent's Park area, a central part of London, on the east side of Park Square East. Park Square East is a private road, owned by The Crown Estate Paving Commissioners.
- 3.4 The Site comprises the former Diorama building at no. 18 Park Square East. The building forms part of the Grade I listed terrace running north-south. Built in the 1820s as a Diorama, the Building has a rich history with a number of varied uses throughout its lifetime (discussed in further detail below).
- 3.5 The Building forms part of a series of 12 terraced properties, designed by John Nash, comprises four storeys, with three bays across, plus a part basement level. Unlike other properties along the terrace, a considerable part of its bulk is at the rear and 'fans out' behind other properties to almost four times the width of the front.
- 3.6 Due to its varied history, the Building has undergone major alterations during a number of periods in history. Most recently, the Building was occupied from the late 1990s as an office-type use, by the Prince's Trust, a charitable institution. It has been vacant since 2013 and is in need of significant intervention, to modernise the space and provide efficient and usable floor areas for a new use.
- 3.7 The Building is currently linked internally with nos. 17 and 19 Park Square East, although is to be subdivided as part of this Application and other applications for these properties, submitted concurrently.
- 3.8 The Building comprises approximately 2,142 sqm of gross internal area within No. 18 Park Square East. This does not include the floorspace for nos. 17 and 19.
- 3.9 The Building is Grade I listed and the Site is located within Regent's Park Conservation Area. The majority of buildings / spaces within this area are listed, which includes Regent's Park as a registered park and garden.
- 3.10 A full description of the existing building is provided within the Design and Access Statement and Heritage Statement.

Surrounding Area

- 3.11 The surrounding area is predominantly characterised by a variety of uses, such as offices, residential, hotels, diplomatic and educational buildings, owing to its central London location.
- 3.12 Park Square East forms one side of a block, with Albany Street, Marylebone Road and St Andrews Place. Albany Terrace and Peto Place runs through the middle of the block and to the rear of the Site, providing access from Marylebone Road and Albany Street, respectively.
- 3.13 The Site is bound to the west by Park Square East, on the opposite side of which is Park Square, one of the largest private squares in London, which is owned by the Crown Estate Paving Commission (CEPC). Regent's Park dominates the area to the north west.
- 3.14 The stuccoed terraced houses extend both north and south of the Site, forming Park Square East. This continues south, on the opposite side of Marylebone Road, forming Park Crescent, also designed by John Nash. Marylebone Road (A501) is a busy thoroughfare running east-west, with Great Portland Street and Regent's Park underground stations located along it.
- 3.15 To the west of the Site is Albany Terrace and Peto Place, providing rear access to the buildings within the urban block. The terrace comprises car parking and unloading areas, and contains a large tree to the very south of the Site.
- 3.16 Directly to the rear of the Site, is the 'Which? Building', which fronts on to Marylebone Road/Albany Street. The building provides office accommodation and was recently extended at roof level to provide an additional fourth storey of office accommodation and alterations to the façade, under a planning permission granted in February 2015 (ref. 2013/5840/P).
- 3.17 The area further to the east of the Site comprises larger and taller office and hotel buildings, which gradually steps up towards Euston station, from 10 storeys (e.g. Melia White House hotel) to 36 storeys (Euston Tower).
- 3.18 St Andrews Place forms the north edge of the urban block, providing a further listed terrace of a similar scale to Park Square East. The Royal College of Physicians building is situated north of this.

Heritage

- 3.19 The Building forms part of a group listing relating to nos. 13-24 Park Square East (and attached railings) (The Diorama and Bedford College Annexe), which is Grade I listed.
- 3.20 The list entry (ref. 1322054) states:

“Includes: The Diorama, Bedford College Annexe

PETO PLACE. Terrace of 12 houses, the northern most bay forming part of No.1 St Andrew’s Place (qv). c1823-5. By John Nash. Nos 13-16 and Nos 20-24 converted to flats c1986, many original interior features destroyed. Stucco and slated mansard roofs with dormers.

EXTERIOR: symmetrical terrace, 3 bays at either end and centre 7 window bays projecting. Projecting bays 4 storeys, and basements; otherwise, 3 storeys, attics and basements. 3 windows each. Ground floor with attached Ionic order supporting an entablature surmounted by a continuous cast-iron balcony (the northern most projection without railings). Square-headed doorways with architraves, cornices, pilaster-jambs carrying cornice-heads and patterned fanlights (except Nos 16, 19, 21, and 23) and panelled doors. Architraved sash windows with cornices and some glazing bars. 1st floor windows arcaded with keystones, archivolt and moulded imposts. 2nd floor sill band. Dentil cornice at 3rd floor with attic storeys over centre and end bays and balustraded parapets between.

INTERIORS: with stone stairs, cast-iron, foliated balusters and wreathed wood handrails. Some panelled rooms; most with enriched ceiling cornices and central roundels. Rear ground floor room of No.24 with good vaulted and moulded ceiling, roundels of Classical figures, pilasters and pedimented mirror over original fireplace.

SUBSIDIARY FEATURES: attached cast-iron railings with urn finals to areas. No.18 incorporates at the rear, in Peto Place, a 3 storey, altered, polygonal building in brick with stone capped buttresses between round-arched 2nd floor windows. This was the Diorama, a picture show designed by Augustus Charles Pugin. By 1854 it had been converted into a Baptist Chapel which closed 1922 when the Middlesex Hospital used it for a rheumatism treatment pool. An arts co-operative at time of inspection in 1989.”

- 3.21 The Site is located within the Regent’s Park Conservation Area.
- 3.22 The surrounding area contains a number of historic buildings and designated heritage assets. It is in close proximity (within 100m) to the following assets:
- 13-24 Park Square East (and attached railings) (The Diorama and Bedford College Annexe) (Grade I);
 - Regent’s Park (Grade I Park and Garden);
 - 1-8 St Andrews Place (and attached railings) (Grade I);
 - Forecourt Railings and Lamp Post to nos. 1-8 St Andrews Place (Grade II);
 - 9 & 10 St Andrews Place (Grade I);
 - Forecourt Railings to nos. 9 & 10 St Andrews Place (Grade II);
 - Royal College of Physicians (Grade I);
 - 31 and 33 Albany Street (Grade I);
 - Holy Trinity Church (Grade I);
 - 1, 2 & 3 Albany Terrace (Grade I);

- Forecourt Railings to 1, 2 & 3 Albany Terrace (Grade II);
- 2 Marylebone Road (and attached railings) (Grade II*);
- South East Lodge in Park Square (Grade II);
- Six Lamp Posts, Park Square East (Grade II);
- Three Lamp Posts, St Andrews Place (Grade II);
- Lamp Post, St Andrews Place (Grade II);
- 1-17 Albany Street (and attached railings) (Grade II);
- 19 Albany Street (and attached railings) (Grade II);
- East Lodge in Corner of Crescent Gardens (Grade II); and
- Forecourt Railings and Lamps to 2 Marylebone Road (Grade II).

Accessibility

- 3.23 The Site has a Public Transport Accessibility of 6b which is categorised as 'excellent', as it is located in close proximity to a variety of public transport routes.
- 3.24 The nearest London Underground station is Great Portland Street (Circle, Metropolitan and Hammersmith and City lines), located 160 metres south of the Site, with Regent's Park (Bakerloo line) situated 225 metres from the Site.
- 3.25 The Site is also within walking distance of Warren Street (Victoria and Northern line) which is 585 metres to the south and Baker Street (Jubilee, Bakerloo, Circle, Metropolitan and Hammersmith and City) which is 890 metres to the west. The Site is therefore within walking distance to the majority of London's main underground lines.
- 3.26 The Site is located within close proximity to both London Marylebone and Euston, with all other national rail stations in London accessible via its excellent underground links.
- 3.27 The Site is highly accessible to London's bus network. The nearest bus stops are 190 metres from the Site at Regent's Park station (with five routes operating), with additional stops on Albany Street (200 metres), Great Portland Street (200 metres) and Warren Street station (615 metres).

Site and Planning History

Site Background

- 3.28 The Building has a rich history of uses since they were built in 1823 as a Diorama (no. 18) with a flanking house to each side. The street elevation was designed by John Nash, with the interior of the building designed by Charles Pugin. The Diorama was the first of its kind in Britain (following the success of a diorama in Paris), using lighting to animate paintings and create scenes.
- 3.29 Nos. 17 and 19 Park Square East were built as houses and were occupied as townhouses for the majority of their history until the 1990s.

- 3.30 In 1855, the Diorama was converted to a Baptist Chapel with a school below, following its purchase by Samuel Peto and known as the Regent's Park Chapel. Substantial alterations were required to convert the building from its unusual Diorama layout to the chapel.
- 3.31 The chapel vacated in 1922 and the Building was taken over by the Middlesex Hospital to be used as a Rheumatic Diseases Centre, undergoing radical intervention.
- 3.32 Following the occupation of the Building as a hospital, it has had numerous uses in the post-war period. In 1965, the Bedford College (part of the UCL) used the Building for teaching sessions and administration. The Royal Association of Disability operated their offices from the building between 1975 and 1980.
- 3.33 During the 1980s, the Diorama Arts Centre and workshops occupied the Building, vacating in around 1990. The plan form for the Building largely remained as per the 1922 conversion, although in the 1990s, the three (nos. 17, 18 & 19) buildings were combined into one, to be used as offices for the Prince's Trust.

Planning History

- 3.34 The earliest planning application on the online planning register dates from 1982. Due to the relationship of the three buildings, the planning history that we set out below includes applications that cover a single building and all three buildings. The following provides a description of the planning applications for all three buildings, nos. 17, 18 and 19 Park Square East.
- 3.35 On 8 November 1982, planning permission and listed building consent were refused for the conversion of the three buildings into offices, residential and a museum (ref. 34705).
- 3.36 A similar application for the conversion of the buildings to the same uses, was refused a year later, on 3 November 1983 (ref. 36926), with the reasons being the increase in office floorspace and the Council's intentions to retain the building for 'community purposes'. The refusal was appealed, and this was dismissed by an Inspector on 20 August 1984.
- 3.37 On 12 December 1983, planning permission and listed building consent was granted (refs. 37161) for the use of no. 18 Park Square East and 14 Peto Place for an arts centre, workshops and performance spaces together with the erection of a new extension at roof level.
- 3.38 On 20 August 1984 planning permission was granted for the conversion of nos. 17 and 19 Park Square East to residential.
- 3.39 On 14 August 1986, planning permission and listed building consent was refused (ref. 8600031 / 8600032) for the "*change of use including works of conversion to twenty self-contained flats and maisonettes with associated car parking and an exhibition*

gallery.” This related to nos. 17, 18 & 19 and was refused on the basis of the loss of a community building. The decision was appealed and an Inspector dismissed the appeal on 26 July 1987.

3.40 Associated applications for internal and external works to the buildings were also refused on 14 August 1986 (ref. 8670007 / 8670008).

3.41 On 11 September 1986, planning permission and listed building consent (refs. 8670158 / 8600747) were granted for the following development:

“The continued use of the building as a centre for entertainment and the arts with associated activities and the provision of a museum of the Diorama and Panorama; and the alterations including the erection of a roof extension.”

3.42 On 7 March 1990, planning permission and listed building consent (refs. 8903492 / 8970518) were granted for the renewal of an August 1984 planning permission, confirming the conversion of nos. 17 and 19 buildings to residential, including works of partial demolition.

3.43 In April 1990, an application for planning permission (ref. 9070432) was submitted for alteration and restoration of the Diorama building (no. 18) to provide a theatre, cinema, drawing school, artists studio, arts club, restaurant, bars and ancillary facilities including exhibition space for the museum of the Diorama together with a panorama and gallery. The application was never determined.

3.44 On 10 January 1991, planning permission was granted for the conversion of nos. 17 and 19 Park Square East from residential to office use (Class B1).

3.45 On 8 June 1995, planning permission was granted (ref. 9401950) for the use no. 18 Park Square East (the former Diorama building only) for ‘institutional purposes’.

3.46 The 1995 Permission was granted, subject to a condition restricting the use to diplomatic and allied uses and the headquarters of professional, cultural, charitable and learned institutions, associations and trade federations. The Building was subsequently occupied by the Prince’s Trust until their departure from the Building in 2013.

3.47 In the 1990s, there were a number of planning permissions and listed building consents granted relating to physical works to the building, including:

- Nos. 17 + 19 - 9370025 – Works of internal and external refurbishment, approved 17 September 1993;
- Nos. 17/18/19 – 9501406 – Erection of roof top plant room and glazing to the rear, approved 13 October 1995;
- Nos. 17/18/19 – 9904085 – Rebuilding part of boundary wall onto Peto Place, approved 15 April 1999.

- 3.48 In January 2015, The Crown Estate submitted an application for planning permission and listed building consent was submitted (ref. 2014/7770/P) in relation to nos. 17, 18 & 19 for the following:

“Change of use of offices (Class B1) to residential (Class C3) to provide 6 x 3-bed flats and 2 townhouses including extension of existing lightwell (facing Peto Place), additional storey at 3rd floor level to building facing Peto Place, basement excavation, refuse and cycle storage and single storey sub-station (to the rear of 3 Albany Terrace).”

- 3.49 LBC considered the 2015 Application for approximately 18 months but it was never determined and was subsequently withdrawn prior to a decision being made.

4.0 DEVELOPMENT PROPOSALS

- 4.1 As set out in **Section 3** of this Statement, the Application seeks planning permission and listed building consent for the refurbishment, extension and conversion of the existing listed building to provide an office building providing modern floorplates for commercial use.
- 4.2 The Scheme would involve:
- Change of use of existing building from institutional use (Sui Generis) to offices (Class B1a) use;
 - Extension of the rear part of the building at roof level to provide additional floorspace at third floor level;
 - Minor excavation to extend the lower ground floor area;
 - Restoration, refurbishment and associated works to the listed building;
 - Internal modifications to the Building, including insertion of passenger lifts and step-free access; and
 - Provision of cycle parking, waste facilities.
- 4.3 During the pre-application stage, as set out in **Section 3**, a number of recommendations were made by LBC officers and subsequent amendments were made to the design of the development following the advice received.
- 4.4 This process is set out in full detail within the Design and Access Statement, prepared by MWA, which accompanies this submission.

Demolition and Physical Alterations

- 4.5 The Proposed Development seeks to largely retain the external form of the Diorama, with limited external alterations proposed. The main changes to the Building are the introduction of a roof level extension (and revised roof design) and a number of internal alterations.
- 4.6 These are described in detail within the Heritage Statement.
- 4.7 Non-original modifications to the Building are proposed to be removed, including the rotunda, to reinstate its spatial hierarchy. A stone staircase is proposed to wind up around the rotunda and the installation of glass service lifts. The drum is to be lined with brickwork with a slate roof capping the space.
- 4.8 The walls and internal glass windows of the rear rotunda are to be retained, with infilling of the void at first and second floors. The memory of the atrium is retained by the structure and the use of daylight ceilings and lighting.

- 4.9 The Proposals seek to introduce a pitched roof extension on the rear part of the Diorama, reinstating a similar roof structure present in the inter-war period. The central parts of the roof are flat roofed, and provide a small terrace for staff amenity.
- 4.10 There are no changes proposed to the front elevation of the Building, other than the introduction of an iron gate and stone steps to match others in the terrace, accessing the front lightwell. The stone steps would be refurbished and new Portland Stone laid.
- 4.11 Partial excavation is required to provide further ancillary space at lower ground level.

Office Accommodation

- 4.12 At ground floor, the steps would be pushed back, with the main public entrance opening into the main lobby area. The central atrium would be opened up to provide circulation space including the winding staircase and lifts. The main office floorplate is proposed to be situated in the rear part of the Building, alongside supporting facilities such as WCs and cycle spaces.
- 4.13 Three upper floors would provide almost uninterrupted office floorplates to the rear of the Building, with the exception of the central rotunda, which would be utilised as meeting space. A new meeting room would be created at first floor level to the front of the Building within a new floor.
- 4.14 Excavation is proposed at lower ground floor to provide ancillary floorspace, providing area for plant rooms, services, utilities and the future plate heat exchanger. Both female and male shower and changing facilities are provided at this level.
- 4.15 The existing Building provides 2,142 sqm of floorspace (GIA) within no. 18. Through the reconfiguration of the Building, plus the extension at roof and basement levels, the overall floorspace provided within the Proposed Development would be 2,879 sqm (an uplift of 737 sqm).
- 4.16 We have calculated, based upon the HCA's *Employment Density Guide (3rd Edition)* (November 2015) that the proposed development would generate 206 jobs through the operation of the Building (an uplift from existing of 138 total jobs that, on the same density, could be generated within no. 18 today).
- 4.17 The Design and Access Statement sets out that inclusive accessibility measures that have been incorporated into the design. Level access to the Scheme is provided via a new secondary access from Peto Place, with fully accessible lifts providing access to other floors. Special cycle stores, accessible showers/changing facilities, WCs, plus corridors and spaces that meet the requirements for wheelchair turning are all provided.

Parking, Access and Storage

- 4.18 The Proposed Development is, for the most part, 'car free' and would not provide any on-site car parking other than a single accessible bay located on Peto Place. This is

in accordance with draft London Plan policy and the LBC Local Plan which promotes car-free developments.

- 4.19 Servicing of the office use is proposed to take place from Peto Place, via the rear entrance, which would also accommodate the waste collection. Waste storage would be provided towards the rear of the Building, at ground floor level and would provide both refuse and recycling bins. The storage room will be in accordance with Building Regulations requirements.
- 4.20 The Proposed Development retains its pedestrian access from Park Square East, which provides the main entrance to the office lobby. The rear access to the building from Peto Place / Albany Street provides an additional staff entrance who arrive to the Building on foot or by cycle.
- 4.21 The main cycle store is located at ground floor level to the rear of the Building, with 28 secure cycle spaces provided for staff. In addition, there would be two spaces for special/larger cycles providing facilities for accessible, recumbent or cargo cycles. Full changing facilities and showers are provided within the basement level.
- 4.22 There is an existing arrangement for occupants of the Diorama to use up to 8 cycle parking spaces within the Which? Building adjacent to the Diorama, which is being retained as part of the Proposed Development, with a further 8 cycle spaces to be made available (a total of 16 off-site).
- 4.23 Short stay cycle parking is provided adjacent to the building, externally, at Peto Place, with a total of six spaces.
- 4.24 The total cycle parking provision for the Proposed Development is 46 long stay spaces plus six short stay spaces.
- 4.25 A variety of plant rooms serve the Building, located within the basement levels and at roof level.

5.0 PLANNING POLICY FRAMEWORK

- 5.1 This Application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context, and **Section 6** provides an assessment of the Application against the policies and guidance contained within these documents.

National Guidance

- 5.2 The revised National Planning Policy Framework (the “NPPF”) was published on 19 June 2019 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements, as well as previous versions of the NPPF, first published in 2012. The NPPF sets out the Government’s approach to planning matters, and is a material consideration in the determination of planning applications.
- 5.3 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 11 states that decisions should apply a presumption in favour of sustainable development and goes on to state that:

“For decision taking this means:

...

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

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

Statutory Framework

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

5.6 The Statutory Development Plan for the Site comprises the:

- London Plan, Spatial Development Strategy for Greater London (Consolidated with Alterations since 2011) (March 2016) (the “London Plan”); and
- London Borough of Camden Local Plan (July 2017).

Emerging Policy

Draft London Plan

5.7 The current London Plan was produced in 2011 and has been subject to numerous ‘Alterations’, most recently in 2016. These alterations have refined policy on housing and parking standards, but not revised the strategic objectives of the plan.

5.8 The London Plan is currently being reviewed and it is in the late stages of this process.

5.9 Once adopted, this version will supersede the 2016 consolidation plan. The Draft London Plan is currently a material consideration in planning decisions, and will gain more weight as it moves through the process to adoption.

5.10 On 1 December 2017, the Mayor produced a Draft London Plan for consultation which ran until 2 March 2018. The Examination in Public commenced on 15 January 2019 and concluded in March 2019.

5.11 The ‘consolidated’ version of the London Plan shows all of the Mayor’s suggested changes following the Examination in Public (EiP) of the draft Plan was published on 17 July 2019.

5.12 The publication and the Adoption of the final London Plan is expected in early 2020.

Emerging LB Camden Policy

5.13 The current Local Plan was adopted on 3 July 2017 and forms the basis of the strategic and development management policies shaping planning decisions. Throughout 2018 and 2019, LBC updated its suite of Camden Planning Guidance documents to support the Local Plan.

5.14 The Local Development Scheme (March 2019) sets out that a review of the Local Plan is likely to commence in 2020/21. In the meantime, LBC is focusing on updating its 2013 Site Allocations Local Plan, with consultation due to be undertaken in late 2019 and adoption in Summer 2021.

Regional Guidance

5.15 The Greater London Authority (GLA) has published a number of supporting documents that are relevant in the consideration of this application. Of relevance are:

- SPG: Crossrail Funding (March 2016);
- SPG: Central Activities Zone (March 2016);
- SPG: Social Infrastructure (May 2015);
- SPG: Accessible London: Achieving an Inclusive Environment (October 2014);
- SPG: The control of dust and emissions during construction and demolition (July 2014);
- SPG: Shaping Neighbourhoods: Character and Context (June 2014);
- SPG: London Planning Statement (May 2014);
- SPG: Sustainable Design and Construction (April 2014); and
- SPG: Planning for Equality and Diversity in London (October 2007).

5.16 LBC has a number of adopted guidance documents which are material considerations in respect of the Application including:

- Access for All CPG (March 2019);
- Air Quality CPG (March 2019);
- Amenity CPG (March 2018);
- Basements CPG (March 2018);
- Biodiversity CPG (March 2018);
- Community Uses, Leisure and Pubs CPG (March 2018);
- Design CPG (March 2019);
- Developer Contribution CPG (March 2019);
- Employment Sites and Business Premises CPG (March 2018);
- Energy Efficiency and Adaptation CPG (March 2019);
- Transport CPG (March 2019).

5.17 In addition to the above, the *Regent's Park Conservation Area Appraisal and Management Strategy* (July 2011) is a material consideration in the determination of this Application.

5.18 The remainder of this document identifies the key issues relevant to the determination of the Application and considers these in the context of relevant policy guidance.

5.19 The documents submitted as part of this Application also make reference to other technical guidance and legislation which is relevant to particular planning issues.

Site Specific Designations

5.20 The Site is the subject of the following designations under the LBC Policies Map (July 2017);

- Central London Area; and
- Regent's Park Conservation Area.

5.21 As noted previously, the Site forms part of Grade I listed building. The Site is located outside of but close to the protected viewing corridor from Primrose Hill to Westminster Cathedral.

6.0 PLANNING POLICY ASSESSMENT

- 6.1 Within this section, we assess the component parts of the proposed development against the statutory development plan and other material considerations as outlined in **Section 5**.

Loss of 'Public Use'

- 6.2 The existing building is within a quasi-public or institutional office use. Although the Building has been vacant for over half a decade, the previous user of the Site was a charity, occupying the Building under the 1995 planning permission which converted the Site to a range of institutional or charitable purposes.
- 6.3 LBC considers the lawful use of the Building to be sui generis and to form part of its heritage value. The previous uses of the Building (i.e. the Baptist chapel and hospital) have also been public uses and there have been numerous proposals in the later part of the 20th century to utilise the Building for arts and leisure uses.
- 6.4 There is no adopted planning policy which explicitly seeks to retain charitable or institutional office uses and the 'loss' of this former public building must be considered on its own unique merits.
- 6.5 LBC supports the concentration of educational, cultural and research institutions within Central London, which perform a largely local role and function, but many of which have a national or international orientation. Supporting paragraph 4.32 of the Camden Local Plan notes that these institutions contribute to the local and national economy by supporting enterprise and innovation, the generation of jobs and the procurement of goods and services.
- 6.6 As set out above, the Prince's Trust occupied the Site until the end of their lease in 2013 and have since moved on to other premises, following which, the Building has remained unoccupied. We understand from previous applications that the Crown Estate began to consider alternative tenants for the building in 2010, in anticipation of the end of the lease.
- 6.7 The Crown Estate marketed the Site for the best part of half a decade and found that demand within the charitable and institutional sector for new accommodation has been very low, and a building of this age and inefficiency is not sought after.
- 6.8 In 2014, the Crown Estate's advisors set out that the Prince's Trust's had a number of reasons for leaving the Building which included the Diorama's upkeep costs, which are high and considered likely to rise, the grandiose nature of the Building which can sometimes give the wrong impression for a charitable trust and issues with level access and access to services.
- 6.9 The existing space is poorly laid out, inefficient in operation and costly to run with the existing heating and lighting systems. Some areas of the Building are incapable of

use. These are inbuilt inefficiencies that do not lend themselves to be appropriate for a charitable type use.

- 6.10 Likewise, there are issues with the existing building that mean that the Building, in its current form, does not provide attractive or suitable space to an office occupier, including the under-provision of lifts, disabled access, energy efficiency and running costs.
- 6.11 The existing floor layout, including columns, provides inefficient and compromised floorplates. The outlook from the Building is poor, with deep floorplates and lack of natural light to some rooms. The arrival experience is also poor, with a lack of level access throughout the Building.
- 6.12 Since the departure of the previous tenant, the Building has fallen further into disrepair, and a period of vacancy of nearly seven years.
- 6.13 The Building is therefore in need of significant works to attract a suitable tenant and an opportunity exists to develop a scheme that is sensitive to the historic use of the Building and its significant features.
- 6.14 Both the Applicant and LBC are keen to ensure that a public appreciation of the Building is maintained, given its interesting historical and quasi-public uses since it was built. This has formed an integral feature of the consultation process and the Applicant is committed to ensuring that future generations are able to experience 'The Diorama's' history.
- 6.15 The Applicant is exploring a number of ideas to deliver this, including:
- A website for the Diorama to explain its origins, history and art form;
 - A physical model of the original Diorama building to be located nearby in Regent's Park;
 - Partnering with Open City's Open House to allow participants to experience the completed development; and
 - A 3D Digital model with virtual reality capability to allow users to experience the original diorama as it once was.
- 6.16 This is intended to be secured by way of a planning condition, which could require a Management Plan to be submitted for approval to secure an appropriate solution.

Principle of Office Development

- 6.17 The principle of office-type floorspace on this Site is established through its previous use as institutional offices, which occupied this and the adjacent buildings between 1995 and 2013.
- 6.18 The NPPF, at Paragraph 20 states that strategic policies should make sufficient provision for commercial development, whilst Paragraph 85 states that planning policies should meet anticipated needs for office uses.

- 6.19 London Plan Policy 4.1 (Developing London's Economy) promotes the continued development of a strong, sustainable and diverse economy by ensuring sufficient and sustainable workspaces.
- 6.20 London Plan Policy 4.2 (Offices) supports the redevelopment of office provision to improve London's competitiveness and address wider objectives of the Plan, including its varied attractions for businesses of different types and sizes.
- 6.21 For Central London, Policy 4.2 seeks to recognise and address the strategic and distinct needs of its office market by sustaining and developing its unique and dynamic clusters of 'world city' and other business environments. The policy also encourages the renewal and modernisation of existing office stock in viable locations to improve its quality and flexibility, as well as increases in the current stock where there is need.
- 6.22 London Plan Policy 2.11 (CAZ – Strategic Priorities) seeks to enhance and promote the unique roles of the CAZ, supporting the mix of uses and its strategic uses. Office development should not be strategically constrained in appropriate parts of the CAZ (Policy 2.10).
- 6.23 The Draft London Plan, at emerging Policy GG2, seeks to make the best use of land by enabling development of brownfield land, prioritising surplus public sector land and sites which are well-connected within town centres. Intensifying the land uses on sites should be proactively explored.
- 6.24 Draft London Plan Policy GG5 seeks to conserve and enhance London's global economic competitiveness, promoting its existing strengths and potential and seeking economic diversity.
- 6.25 Draft London Plan Policy SD4 further promotes the CAZ and its strategic functions including office uses and the intensification of such uses, with its attractiveness towards businesses enhanced.
- 6.26 The Draft London Plan is clear in noting that residential development should not compromise the strategic functions of the CAZ (Draft Policy SD5). Offices (and other strategic functions) are to be given greater weight relative to new residential development in this part of the CAZ.
- 6.27 LBC Local Plan Policy G1 (Delivery and Location of Growth) seeks to create conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.
- 6.28 Policy G1 seeks to meet Camden's objectively assessed needs of 695,000 sqm of office floorspace by 2031 and will deliver this through supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the Site.

- 6.29 Policy G1 also sets out that development will take place throughout the borough with significant growth delivered through development at highly accessible locations, in particular Central London.
- 6.30 Local Plan Policy E1 (Economic Development) seeks to secure a successful and inclusive economy in Camden by creating conditions for economic growth and harnessing the benefits for local residents and businesses.
- 6.31 Relevant to this Application, Policy E1 seeks to:
- *“support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;*
 - *maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;*
 - *support local enterprise development, employment and training schemes for Camden residents;*
 - *encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;*
 - *direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031;*
 - *expect the provision of high speed digital infrastructure in all employment developments...”*
- 6.32 The Proposed Development would contribute to the borough’s Economic Development policy through the provision of a medium sized office building that would be well-suited to small and medium-sized enterprises. The floorplates can be divided to provide space for smaller businesses, as well as providing a single let office, ensuring that the Building is suitable for a range of businesses.
- 6.33 In addition, the Site is situated within Central London, thereby contributing towards the borough’s forecast office demand within a preferred area.
- 6.34 Local Plan Policy E2 (Employment premises and sites) encourages the provision of employment premises and sites in the borough. Although currently vacant, the existing building most recently provided an ‘employment premises’ as office floorspace for a charitable institution. In accordance with Policy E2, the Proposed Development would:
- Increase the level of employment floorspace;
 - Not impact or require the relocation of any existing businesses (as the Site is currently vacant);
 - Provide the ability for small and medium sized enterprises to occupy space; and
 - Increase employment opportunities for local residents.

- 6.35 It is estimated, based upon the HCA's *Employment Density Guide (3rd Edition)* (November 2015), that the existing building had the potential to generate 138 employment opportunities based on the existing net internal area (of no. 18 only).
- 6.36 The Proposed Development seeks to refurbish the existing building and make a number of internal alterations as well as extend the building to increase the quantum of useable commercial area on this Site. Based on a 1:10 ratio, the employment generation within the Proposed Development would be 206 office jobs. This does not include employment opportunities generated at the construction stage of the development.
- 6.37 The increase in office accommodation is entirely appropriate in this location as the Site is centrally located close to a transport hub, with excellent links to other transport options. The surrounding area is predominantly office and commercial based and this use would complement the other uses.
- 6.38 With the principle of an office type use already established on this Site, the Proposed Development acts to increase employment generation and contributes to objectives for achieving economic growth with additional office floorspace, which is of a high quality and suitable for modern companies
- 6.39 The principle of intensifying the use is also supported by both regional and local planning policy which identifies the need for significant additional office floorspace within Camden, retaining and enhancing its strategic role in London's office sector. This Scheme would contribute to meeting Camden's office floorspace and the requirement for additional jobs. In this context, the principle of increased office use on this Site is acceptable and accords with the development plan.

Mixed Use Development

- 6.40 LBC Local Plan Policy H2 (Maximising the supply of self-contained housing from mixed use schemes) sets out that, where non-residential development is proposed, the Council will promote the inclusion of self-contained homes as part of a mix of uses.
- 6.41 In the Central London Area, where development involves additional floorspace of 200 sqm (GIA), 50% of all additional floorspace is required to be self-contained housing, subject to the following considerations:
- a. *“the character of the development, the site and the area;*
 - b. *site size, and any constraints on developing the site for a mix of uses;*
 - c. *the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;*
 - d. *whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and*
 - e. *whether the development is publicly funded or serves a public purpose.”*

- 6.42 Where housing is required, self-contained housing is to be provided on-site where 1,000 sqm (GIA) of additional floorspace or more is proposed. Where this is not practical or housing would be more appropriately provided off-site, a provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu would be sought.
- 6.43 The Proposed Development seeks approval for an additional 737 sqm of floorspace (GIA), which is below the threshold set out within the Local Plan Policy H2. The Proposed Development is not, therefore, required to provide residential on-site.

Design Principles

- 6.44 High quality and inclusive design is encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development, and should contribute positively to making places better for people. Part 12 of the NPPF outlines the requirement for good design and sets out, at Paragraph 127, that development:
- a) *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*
- 6.45 Chapter 7 of the London Plan sets out the Mayor’s policies on a number of issues relating to London’s places and spaces.
- 6.46 Policy 7.2 (An Inclusive Environment) requires all new development in London to achieve the highest standards of accessible and inclusive design, while Policy 7.4 (Local Character) states that *“development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings”*. Part D of Policy 7.6 (Architecture) states that buildings and structures should *“not cause unacceptable harm to the amenity of surrounding land and buildings”*.

- 6.47 The GLA has also published Supplementary Guidance to the London Plan; 'SPG: Achieving an Inclusive Environment' (2014) provides further detailed advice and guidance on providing inclusive design in London.
- 6.48 LBC's Local Plan Policy D1 (Design) seeks to secure high quality design in development and requires development to:
- a. *"respects local context and character;*
 - b. *preserves or enhances the historic environment and heritage assets...;*
 - c. *is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
 - d. *is of sustainable and durable construction and adaptable to different activities and land uses;*
 - e. *comprises details and materials that are of high quality and complement the local character;*
 - f. *integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
 - g. *is inclusive and accessible for all;*
 - h. *promotes health;*
 - i. *is secure and designed to minimise crime and antisocial behaviour;*
 - j. *responds to natural features and preserves gardens and other open space;*
 - k. *incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
 - l. *incorporates outdoor amenity space;*
 - m. *preserves significant and protected views;*
 - n. *for housing, provides a high standard of accommodation; and*
 - o. *carefully integrates building services equipment."*
- 6.49 Policy D1 is supported by Camden's Planning Guidance on Design, adopted in March 2019.
- 6.50 LBC Local Plan Policy C5 (Safety and Security) aims to make Camden a safer place and requires developments to demonstrate that they have incorporated design principles which contribute to community safety and security and for appropriate measures to be incorporated.
- 6.51 Full details of security is likely to come forward during detailed design and reserved by way of a planning condition.
- 6.52 LBC Local Plan Policy C6 (Access for All) seeks to promote fair access and remove barriers that prevent everyone from accessing facilities and opportunities. The policy expects buildings and places to meet the highest practicable standards of accessible and inclusive design with fully accessible routes through buildings and facilities in the most accessible parts of buildings.

- 6.53 The Design and Access Statement sets out that inclusive accessibility measures that have been incorporated into the design. Level access to the development is provided via a new secondary access from Peto Place, with fully accessible lifts providing access to other floors. Special cycle stores, accessible showers/changing facilities, WCs, plus corridors and spaces that meet the requirements for wheelchair turning are all provided.
- 6.54 A Design and Access Statement (DAS), prepared by MWA, is submitted as part of the Application. This document sets out in detail an evaluation of the Scheme's design and the manner in which this has progressed as a result of the consultation undertaken. The Design and Access Statement sets out the design strategy and how it responds to the context of the existing building and surrounding area. The DAS provides a summary of the proposed material palette and describes the approach to the design of the internal and external alterations of the building, including the new roof extension.
- 6.55 MWA's main aspirations for the Proposed Development's design included:
- Reinstating the original spatial hierarchy of the Diorama re-establishing the original Diorama rotunda;
 - Articulation and orientation - improving legibility between floors and overall orientation through the building;
 - The front elevation - paying attention to the setting of the Nash façade, ensuring the new interior does not over-compete with the fine neo-classical envelope; and
 - The roof profile - specifically reinstating a roof form redolent of the original Diorama building.
- 6.56 In accordance with policy requirements the Proposals provide high quality design with an appropriate material palette that successfully responds to the locality and the prevailing character of the surrounding buildings. A key consideration of these Proposals, is the impact on the special interest of the listed building, which is discussed in further detail below.

Heritage Considerations

- 6.57 The existing building is Grade I listed and forms a group listing alongside the other properties along Park Square East. The Site is also located within the Regent's Park Conservation Area and owing to its Central London location, the Site is within the proximity to a number of other listed buildings (including other Grade I listings).
- 6.58 Paragraph 189 of the NPPF states that:

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be

proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."

- 6.59 NPPF Paragraph 193 notes that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.
- 6.60 Any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting should require, clear and convincing justification (NPPF Paragraph 194).
- 6.61 The Heritage Statement provides a full summary of the heritage policy and guidance.
- 6.62 London Plan Policy 7.8 states that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 6.63 LBC Local Plan Policy D2 (Heritage) outlines that LBC will preserve and, where appropriate, enhance the rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.
- 6.64 In relation to designated heritage assets (i.e. listed buildings and conservation areas), Policy D2 states:

"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, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site;*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.*

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm."

- 6.65 In relation to conservation areas, Policy D2 sets out that LBC will:

- e. "require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*

- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage."*

6.66 In relation to listed buildings, Policy D2 sets out that the Council will preserve and enhance these through

- i. "resist the total or substantial demolition of a listed building;*
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*
- k. resist development that would cause harm to significance of a listed building through an effect on its setting."*

6.67 A Heritage Statement has been prepared by Bidwells, and should be read alongside this Planning Statement, the proposed drawings and the Design and Access Statement prepared by MWA.

6.68 The Heritage Statement sets out that the features of highest significance are being preserved as part of the Proposals. This includes the preservation of the principal elevation, which is the part of the Building which contributes most to the significance of the urban listed building and conservation area.

6.69 The Diorama building to the rear is also of high significance with its form providing evidence of original use, which is the most important stage of the Building's history. The unusual form is retained as part of the proposals and some of the internal spaces reinstated. The rear elevations would be retained as well as some internal decorative elements.

6.70 The roof extension would preserve the historic fabric and appearance of the most important parts of the listed building, (with the loss of 1929/30 rooflight being of minimal interest to the Building's significance), and reinstate key elements of its roof form. The Heritage Statement considers that extension is considered to have a neutral impact on the significance of the listed building and conservation area.

6.71 The demolition of internal elements, such as features from the early 20th century, would have a minor impact on the significance of the listed building. The removal of later additions, such as toilet blocks and other 1990s office works would result in a small enhancement.

6.72 The removal of the existing upper ground floor, which was inserted in the 1850s, would have no impact on the significance of the listed building and would enable smoother transition from street to the main office space with level access. Likewise,

the lowering of the ceiling in the main entrance lobby would have no impact on the significance of the listed building, especially as other buildings in the terrace already have this feature.

- 6.73 The placement of partitions at upper levels, to recreate separation between nos. 17 and 18 has been carefully considered to ensure that they do not block the front windows of no. 18, providing an elegant solution to a complex layout and maintaining the hierarchy of the 1820s buildings.
- 6.74 The removal of elements created in the 1990s refurbishment would have no impact on significance and new internal fittings would be removable, thereby preserving the historic fabric. The Heritage Statement notes that:

“These proposals retain and use the features of interest within the Diorama building, whilst removing those elements which are redundant and make little or no contribution to the significance of the listed building. The proposals would also improve the overall appearance of these floors, raising unattractive suspended ceilings which cut across windows.”

- 6.75 The Heritage Statement concludes that the refurbishment, conversion and extension to no. 18 would preserve the architectural and historic interest of the wider listed terrace (nos. 13-24 Park Square East) and the character and appearance of Regent’s Park Conservation Area.
- 6.76 Overall, the Proposed Development would be acceptable in terms of according with the relevant policies on design and heritage, avoiding harm to the significance of the listed buildings and the conservation area, and therefore the decision taker is able to discharge the statutory duties of the Planning (Listed Buildings and Conservation Area) Act 1990 and national and local planning policy.

Archaeology

- 6.77 Local Plan Policy D2 also protects remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.
- 6.78 The Site is not located within an Archaeological Priority Area, although subterranean works are proposed, and therefore an Archaeological Desk Based Assessment has been prepared by RPS.
- 6.79 The Site does not contain any designated archaeological assets, and there has been no evidence which indicates that the use of the Building as a Baptist Chapel involved any burials on the Site. Truncation has occurred on the Site through the construction of the existing basement level.
- 6.80 The Proposed Development does have the potential to impact on archaeological remains from all periods, if present on the Site. However, the construction and usage

of The Diorama may have led to the removal of any archaeological deposits that pre-date the post-medieval period and therefore any impact would likely be on post-medieval archaeological deposits, if present.

- 6.81 It is therefore recommended that further archaeological work is undertaken before and during the construction process for the Proposed Development, by an approved archaeological contractor.

Residential Amenity

- 6.82 Local Plan Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity.

- 6.83 Policy A1 continues to state that LBC will:

- e. “seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
- f. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*
- g. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*
- h. require mitigation measures where necessary.*

The factors we will consider include:

- i. visual privacy, outlook;*
- j. sunlight, daylight and overshadowing;*
- k. artificial lighting levels;*
- l. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;*
- m. impacts of the construction phase, including the use of Construction Management Plans;*
- n. noise and vibration levels;*
- o. odour, fumes and dust;*
- p. microclimate;*
- q. contaminated land; and*
- r. impact upon water and wastewater infrastructure.”*

- 6.84 To support the above policy, LBC has produced extensive guidance within its Amenity CPG.

- 6.85 Careful consideration has been given to the amenities of the surrounding buildings. The form and massing of the proposed extensions have been carefully designed to

cause minimal impact to both sunlight and daylight reaching neighbouring properties, as well as the potential impact from pollution.

Daylight and Sunlight

- 6.86 Local Plan Policy A1 is supported by the Camden SPG on Amenity which provides further guidance on the expectations that LBC has when considering the impact of schemes on daylight and sunlight levels. It notes that levels of reported daylight and sunlight will be considered flexibly taking into account site-specific circumstances and context.
- 6.87 A Daylight and Sunlight Report has been prepared by Hollis which determines the impact of the Proposed Development on surrounding properties. The assessment has been undertaken in accordance with the Building Research Establishment ("BRE"), "*Site Layout Planning for Daylight and Sunlight*".
- 6.88 The report assesses the impact on all neighbouring residential properties, within Park Square East, Albany Terrace, Albany Street and St Andrews Place. A total of 20 properties have been assessed.
- 6.89 The assessment sets out that all of the surrounding windows and rooms meet the BRE targets for daylight (both vertical sky component and daylight distribution) and sunlight (average probable sunlight hours). There is no effect on shading to the surrounding gardens and amenity spaces.
- 6.90 The extensions are set back from the perimeter of the existing buildings and obscured by the existing parapet wall, which reduces any likely impact on daylight and sunlight.
- 6.91 Overall, the scheme is therefore considered to be acceptable with regard to daylight and sunlight considerations and is fully compliant with the BRE guidance.

Noise

- 6.92 LBC Local Plan Policy A4 (Noise and vibration) seeks to ensure that noise and vibration is controlled and managed.
- 6.93 Camden will not grant planning permission for development likely to generate unacceptable noise and vibration impacts or development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.
- 6.94 An Acoustic Assessment has been undertaken by RBA Acoustics to provide results of the noise survey and sets the acoustic performance requirements of the external building fabric elements. In addition, the report outlines suitable acoustic criteria for plant noise.

- 6.95 The prevailing background noise climate mainly consisted of road traffic from Park Square East and rear car park. Based on the background noise and relevant Building Regulations, the project has adopted noise criteria for staff and meeting rooms, open plan office areas.
- 6.96 The report concludes that planning permission should not be rejected on the basis of noise and confirms that internal noise levels can be effectively controlled by glazing configurations. Installation of secondary glazing is not required to achieve internal acoustic levels.

Construction Management Plans

- 6.97 The supporting text to Local Plan Policy A1 (paragraph 6.12) outlines that measures required to reduce the impact of demolition, excavation and construction works must be outlined within a Construction Management Plan (CMP).
- 6.98 In accordance with adopted plan policy and Camden Planning Guidance, the Construction Management Plan (CMP) Pro Forma has been drafted and submitted with this application by Motion.
- 6.99 This demonstrates how construction impacts will be minimised, in relation to site activity during works and the transport arrangements for vehicles servicing the Site.
- 6.100 We note that this draft ProForma will be progressed to a final version should planning permission be permitted. As is usual in Camden, this is likely to be the requirement of clause in the Section 106 legal agreement.

Conclusion

- 6.101 Overall, the Proposed Development has been designed to limit the impact on neighbouring residential (and other uses') amenity. The proposed extension to the existing building is of a scale and mass that would preserve the amenity currently enjoyed by nearby residents and future residents within nos. 17 and 19 Park Square East. The aim of the project is to ensure that potential impacts from noise and odour are limited during construction. Furthermore, mitigation and management procedures can be put in place during the operational lifetime of the building to ensure health and well-being in the local area is maintained.

Transport

- 6.102 Section 9 of the NPPF sets out the Government's policies with regard to transport. Paragraph 108 sets out that development should be ensured that:
- a) *“appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - b) *safe and suitable access to the site can be achieved for all users; and*

- c) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*"

6.103 The chapter concludes at paragraph 111 that:

"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed."

6.104 Chapter 6 of the London Plan provides the regional guidance for transport.

6.105 Policy 6.1 (Strategic Approach) seeks to encourage the *"closer integration of transport and development"*, while supporting *"development that generates high levels of trips at locations with high public transport accessibility and/or capacity"*.

6.106 Policy 6.10 aims to bring about a significant increase in walking, by improving the quality of the pedestrian and street environment.

6.107 At the local level, Local Plan Policy T1 (Prioritising walking, cycling and public transport) is the primary transport policy which promotes sustainable transport in the borough. The policy seeks to ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links.

6.108 The Site is located within Central London and therefore has access to a number of key services, which are within walking distance of the Site. The Site has an excellent public transport accessibility (PTAL 6a), which ensures excellent links to the Underground, National Rail and bus services.

6.109 The Proposed Development, alongside the subdivision and conversion of adjacent properties, is expected to generate a minimal number of additional trips and would have negligible impact on the public highway network, especially as the development is 'car free'. The majority of trips are likely to be made by walking, cycling or the use of public transport, with some taxi trips associated with the office use.

6.110 A Transport Assessment has been prepared by Motion, which considers the highways and transport matters associated with the development.

6.111 As noted above, the Site is a highly accessible location with high public transport accessibility. The local area has minimal reliance on the private car, with the vast majority of the working population choosing to travel by active, non-car sustainable transport modes. A 'car free' development is therefore entirely appropriate for this development.

- 6.112 Whilst there would be a minor increase in trip generation in the Proposed Development, it is considered that the development proposals are appropriate for the location, would have no material impact on the local transport network and are in accordance with relevant adopted national, regional and local policy guidance.
- 6.113 Overall, the Proposed Development is unlikely to result in a material effect on the highway network local to the Site and there are no highway or transport reasons why the development proposals should be resisted. Specific matters are addressed in further detail below.

Delivery and Servicing

- 6.114 Transport Consultants, Motion, have prepared a Framework Delivery and Servicing Plan in Section 6.0 of the Transport Statement, which seeks to ensure that the operation of servicing activity and refuse collection at the Scheme is successful throughout its operational life, and can be conditioned for final approval by LBC.
- 6.115 The predicted service demand for the office use are for six vehicles per day, with one of these being within the peak hour of 0900 to 1000. Deliveries are to take place on Peto Place, to the rear of the property.
- 6.116 The Scheme would result in a modest increase in deliveries per day over and above existing activity. Based on a survey of existing conditions and the anticipated increase in demand, it is not expected that there would be a materially detrimental impact on the operation of the local highway network.

Car Parking

- 6.117 The NPPF requires local authorities to consider parking provision within new developments, based upon their accessibility and the opportunities for public transport, and facilitate the provision of ultra-low emission vehicles.
- 6.118 London Plan Policy 6.13 (Parking) outlines that the Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.
- 6.119 Local Plan Policy T2 (Parking and car-free development) limits the availability of parking and requires all new development in the borough to be car-free. It is noted that the policy also supports the redevelopment of existing car parks for alternative uses. Car parking would be limited to spaces designated for disabled people where necessary and essential operating or servicing needs.
- 6.120 The Proposed Development does not provide any car parking spaces (with the exception of a single accessible bay on Peto Place), as a result of its sustainable location and excellent accessibility to public transport and active travel modes. It is therefore in accordance with both adopted and emerging policy. It is also appropriate

in the context of its location, which is highly accessible and promotes the use of public transport, cycling and walking.

Cycle Parking

- 6.121 Both the NPPF and the London Plan promote cycling in locations which can be made sustainable.
- 6.122 London Plan Policy 6.9 outlines the Mayor's strategy to increase cycling within the capital. The identified target is for cycling to account for at least 5% of modal share by 2026. The policy outlines that development should contribute to the increase of cycling through the provision of cycle parking facilities and on site changing facilities.
- 6.123 Part B of the above policy states that developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards.
- 6.124 To promote cycling in the borough and ensure a safe and accessible environment for cyclists, LBC will seek to ensure that development:
- provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within CPG7: Transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development; and
 - makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.
- 6.125 The Draft London Plan continues to promote the use of cycling as a means of sustainable transport and maintains (or in some cases, increases) the quantum of cycle parking required through development proposals. The Site is also located within an area where a higher minimum cycle parking standard will be applied for short-stay retail and long-stay office uses.
- 6.126 The Draft London Plan requirements for cycle parking are set out in Table 6.1 below:

Table 6.1 – London Plan Cycling Standards

Use		Long-stay	Short-stay
B1	Offices	1 per 75 sqm	1 per 500 sqm (first 5000 sqm) 1 per 5000 sqm thereafter

- 6.127 The Proposed Development has been designed to meet the Draft London Plan minimum standards, and provides 28 secure indoor cycle spaces for the proposed office use, contained within a cycle store located at ground floor level. Two further

spaces are provided for larger cycles, such as accessible, recumbent and cargo cycles.

- 6.128 In addition, there is an existing arrangement for occupants of the Diorama building to use up to eight cycle spaces within the Which? Building to the rear, which is to be retained as part of the development proposals, and extended to 16 spaces. Long term cycling provision available to the office occupiers, would therefore be 46 total spaces.
- 6.129 Employee cycle welfare facilities would be provided in the form of lockers, showers and changing facilities, also provided within the basement and in close proximity to the cycle parking area for ease of access.
- 6.130 With regard to short stay parking provision, a total of six spaces would be provided adjacent to the building on Peto Place, which is in accordance with the quantum required by the Draft New London Plan.
- 6.131 This cycle parking provision is therefore in accordance with the Local Plan and the more onerous conditions due to be adopted within the Draft New London Plan.

Energy and Sustainability

- 6.132 The NPPF supports the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourages the reuse of existing resources, including conversion of existing buildings, and encourages the use of renewable resources.
- 6.133 The London Plan sets out a number of core policies for major developments with regard to reducing carbon dioxide emissions and providing energy in a sustainable manner. The London Plan targets are not obligatory for major developments, although are useful in guiding development.
- 6.134 London Plan Policy 5.2 (Minimising Carbon Dioxide Emissions) states that development proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the 'be lean, be clean, be green' energy hierarchy. It seeks a 35% improvement in carbon reductions over 2013 Building Regulations for major residential developments.
- 6.135 Policy 5.3 (Sustainable Design and Construction) of the London Plan states that development proposals should demonstrate that sustainable design standards are integral to the proposal. This should include:
- *"Minimising carbon dioxide emissions across the Site, including the building and services (such as heating and cooling).*
 - *Avoid internal overheating and contributing to the urban heat and island effect.*
 - *Promoting and protecting biodiversity and green infrastructure.*

- *Design features such as green roofs can enhance biodiversity, absorb rainfall, improve the performance of the building, reduce the urban heat island effect and improve the appearance of a development.”*
- 6.136 Policy 5.6 of the London Plan (Decentralised Energy) requires all major developments to evaluate the feasibility of connecting to existing or proposed district heating networks.
- 6.137 London Plan Policy 5.7 (Renewable Energy) requires that all major developments seek to reduce their CO2 emissions by at least 20% through the use of onsite renewable energy generation wherever feasible.
- 6.138 The London Plan contains a number of other adopted policies which are relevant to the sustainability of the development, including but not limited to 5.9 (cooling and overheating), 5.11 (green roofs), 5.13 (SuDs).
- 6.139 At the local level, Camden Local Plan Policy CC1 (Climate change mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and operation.
- 6.140 LBC promotes zero carbon development in accordance with the London Plan, requiring all development to reduce carbon dioxide emissions through following the steps of the energy hierarchy.
- 6.141 Local Plan Policy CC2 (Adapting to climate change) requires development to be resilient to climate change and adopt appropriate adaptation measures such as:
- a. *“the protection of existing green spaces and promoting new appropriate green infrastructure;*
 - b. *not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems;*
 - c. *incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and*
 - d. *measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.”*
- 6.142 Policy CC2 also seeks to ensure that development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation. The policy expects non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.
- 6.143 This Planning Application includes an Energy and Sustainability Statement, prepared by Cundall, which assesses the Proposed Development against the Energy Hierarchy and the development plan policies.

- 6.144 As the Building is listed, the existing building elements would not be updated, to avoid causing harm to the special architectural and historic interest of the building. The carbon dioxide emission baseline performance has been on the refurbishment of the building and a minor extension.
- 6.145 The building envelope has not been updated due to the historic sensitivities of the listed building. The new extension has been designed to perform significantly better than the Building Regulation standards and at the Be Lean stage comprises:
- Optimising the extension façade so that solar gains and associated cooling loads are reduced;
 - Centralised gas-fired boiler system to deliver space heating and hot water
 - Cooling by electric chiller;
 - Air handling units to provide ventilation to office and reception areas, and MVHR to the basement;
 - Highly efficient LED lighting with dimming and PIR detection; and
 - Tightly metered and controlled electrical and mechanical systems with a Building Management System.
- 6.146 At the Be Clean stage, investigation into the feasibility of connecting to an existing or proposed district heat network was considered but no feasible network is in the vicinity. However, future proofing of a connection to a network has been considered.
- 6.147 At the Be Green stage, a range of low and zero carbon technologies have been analysed to determine which offer feasible carbon emissions savings. Air source heat pumps were found to offer the highest potential for saving
- 6.148 The proposed energy efficient systems and passive design features result in the Scheme achieving a 63.8% improvements over Building Regulations Part L 2013 Target Emissions Rate, thereby meeting Policy 5.2 of the London Plan. This does includes approximately 20% through energy demand reduction (Be Lean).
- 6.149 The Statement by Cundall also sets out the numerous sustainable features that have been considered for the Scheme, with BREEAM 'very good' rating being targeted. This includes, locally and responsibly sourced materials, regulated water usage, water metering, environmentally friendly construction and recycling facilities.
- 6.150 Overall, the Scheme has been designed to incorporate sustainability features, with low environmental impact central to its design. It has explored potential low and zero carbon technologies, with a target to reducing carbon emissions in line with the development plan policy. The Proposed Development is therefore in accordance with adopted policy.

Basement Development

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

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

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

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

6.153 Extensive guidance is provided within the Basements CPG which was produced in March 2018 and supports the above Local Plan policy.

6.154 Development should also safeguard stability of existing building, nearby buildings and other infrastructure including the highway and railway lines / tunnels, and not increase or exacerbate flood risk on the site or beyond.

6.155 The Proposed Development includes the extension of the existing basement under the site footprint, with a single remote basement to the rear of the rotunda area and lowering of the floor levels in ‘vault’ section. A Basement Impact Assessment has been prepared by CET which assesses the impact of the proposals.

6.156 The Basement Impact Assessment sets out that:

- The basement construction will not materially affect the flow of surface water on the Site;
- The excavation is not likely to encounter groundwater during construction, and whilst the piling may encounter this, the effect is likely to be minimal over the short term and negligible over the long term.
- The nearest walls have been classified as damage category 1 ‘very slight’ on the Burland scale.

6.157 This is supported by a Phase 1 Preliminary Risk Assessment and Geotechnical Report on Ground Investigation (both produced by CET).

- 6.158 A Construction Method Statement has been prepared by Form Structural Design, which provides supporting information on the Building and outline structural scheme for the construction of a new basement. This demonstrates that it would be a viable proposal, and constructed safely according to LBC's latest policy requirements.
- 6.159 A Flood Risk Assessment has been prepared by Form Structural Design which outlines that the Site is located within Flood Zone 1 and is therefore considered to be at low risk of tidal and fluvial flooding. The Proposed Development has been designed with a hydrobrake with a restricted flow and attenuation tank with capacity to take 100 year plus 40% climate.
- 6.160 As noted previously in this section, an Archaeological Desk Based Assessment has been undertaken which identifies the potential for archaeology in this location and recommends further investigative works to be undertaken during the development process.
- 6.161 The Proposed Development has taken into account the site specific ground conditions in developing the basement design. In accordance with the development plan policy, the BIA and other supporting documents identifies that the Proposed Development would safeguard the stability of the existing and nearby buildings and other infrastructure including the highway and railway lines / tunnels, and not increase or exacerbate flood risk on the Site or beyond.
- 6.162 We understand that LBC will use its independent consultants to assess the Basement Impact Assessment, and the project team will provide further information, as necessary, if requested by LBC / independent consultant.

Air Quality

- 6.163 The NPPF, at Paragraph 181 sets out that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified.
- 6.164 London Plan Policy 7.14 requires:
- a. *"minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within AQMAs) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans (see Policy 6.3).*
 - b. *promote sustainable design and construction to reduce emissions from the demolition and construction of buildings following the best practice guidance*

in the GLA and London Councils' 'The control of dust and emissions from construction and demolition'

- c. be at least 'Air Quality Neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as AQMAs).*
- d. ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, and that it is possible to put in place measures having clearly demonstrated equivalent air quality benefits, planning obligations or planning conditions should be used as appropriate to ensure this, whether on a scheme by scheme basis or through joint area-based approaches*
- e. ...".*

- 6.165 The Mayor's SPG on the Control of Dust and Emissions during Construction and Demolition (2014) is also relevant to the Proposed Development.
- 6.166 Improving London's air quality is an integral part of the Draft London Plan, which seeks to reduce public exposure to poor air quality and reduce inequalities in levels of exposure (Draft Policy GG3).
- 6.167 LBC Local Plan Policy CC4 (Air quality) requires the impact of development on air quality to be mitigated and ensure that exposure to poor air quality is reduced in the borough. The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken to the actions identified in the Council's Air Quality Action Plan.
- 6.168 An Air Quality Neutral Assessment (AQA) and Construction Dust Risk Assessment have been prepared by Cundall to determine compliance with the London Plan's policy relating to air quality neutral development. All developments are expected to comply with minimum standards for emissions associated with land use.
- 6.169 The Assessment has calculated the emissions from the Proposed Development, which would meet the Air Quality Neutral benchmark, based on an assumed continuous operation scenario.
- 6.170 The Proposed Development is 'car free' and lies in close proximity to a comprehensive public transport network, meaning that it is unlikely that the 'transport benchmark' is exceeded.
- 6.171 Overall, the AQA concludes that the Proposed Development complies with the Air Quality Neutral building emissions and transport benchmarks and meets the requirements of the new draft London Plan and the relevant Supplementary Planning Guidance.

Waste and Recycling

- 6.172 Local Plan Policy CC5 (Waste) seeks to make Camden a low waste borough and aims to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031. The policy also seeks to make sure that developments include facilities for the storage and collection of waste and recycling.
- 6.173 Waste storage requirements for the Proposed Development has been calculated in line with British Standards and on the assumption that there will be 1 employee per 10 sqm (NIA).
- 6.174 The provision of 2 x 1100L and 1 x 360L refuse bins and 3 x 1100L and 1 x 360L dry mixed recycling bins for the office use has been made, offering three days of waste storage.
- 6.175 The waste store is located at ground floor level, towards the rear of the Building and would be collected via Peto Place.
- 6.176 The communal refuse stores would be ventilated and would also have suitable drainage arrangements and be made of a robust and practical material in order to allow the facility to be easily maintained to try and restrict foul odours egressing into any of the floor areas.

Fire Strategy

- 6.177 The Draft London Plan is to require major developments to submit a Fire Statement as part of a Planning Application, under emerging Policy D11 (Fire Safety). The policy will require development proposals must achieve the highest standards of fire safety.
- 6.178 A Fire Strategy Report has been prepared by Cundall and submitted as part of this Application, which demonstrates that if the works are constructed in accordance with the drawings and design details as submitted, together with the performance requirements prescribed in the report, the Proposed Development would comply with the functional requirements of Part B (Fire Safety) of the Building Regulations 2010.

Community Infrastructure Levy

- 6.179 Within this Application, consideration is given to the 'MCIL2' requirements which came into effect on 1 April 2019. The Site is located within the Central London area and therefore has an increased rate of £185 per sqm for office floorspace.
- 6.180 In addition to the above, LB Camden adopted its Community Infrastructure Charging Schedule in March 2015 which has applied since 1 April 2015. This outlines a rate of £25 per sqm rate for office developments within Zone C (Highgate and Hampstead area).

6.181 A CIL Form has been submitted with this Application which outlines the relevant information for the Scheme.

7.0 CONCLUSIONS

- 7.1 The Proposed Development to which this Statement relates, seeks the refurbishment, conversion and extension of the former Diorama building to provide offices and associated works.
- 7.2 The proposals are part of a comprehensive development to refurbish and extend the Grade I listed former Diorama building, which currently form a single building, and to subdivide these into three separate properties. The Proposed Development alongside two separate applications for the conversion of nos. 17 & 19 Park Square East back to residential townhouses, would return the building backs into three independent buildings.
- 7.3 The Planning Statement has assessed the proposals against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act.
- 7.4 The Scheme has been formulated in accordance with the NPPF, the adopted London Plan and policies set out within the LBC Local Plan. It accords with the relevant policies of the adopted and emerging development plan, as well as being consistent with national planning policy.
- 7.5 The Scheme has been developed following a number of rounds of pre-application discussions with LBC planning officers and, as a result, scheme changes have been incorporated to respond to comments received.
- 7.6 The project team has undertaken public consultation with local residents and interested persons and met with other key stakeholders, which has informed the Scheme.
- 7.7 Having regard to the assessment undertaken within this Statement, we consider the planning benefits arising from this scheme can be summarised as follows:
- Delivering sustainable development of brownfield land within Central London, in line with the overarching approach to development outlined in the NPPF;
 - Delivering development that would contribute positively to the delivery of a mix of uses in Camden, consistent with its strategic objectives and the objectives at all tiers of planning policy;
 - Providing for new and additional commercial floorspace in a highly accessible CAZ location and, further contributing to London's commercial aims through high quality and flexible space;
 - Providing a mixed use development through the provision of office floorspace on this Site and subdividing parts of the building to form residential townhouses (subject to separate applications).

- Ensuring that the Site is brought back into its optimum use, through the creation of a high quality office building with modern and efficient floorplates and spaces;
- Optimising the Site in providing additional employment opportunities with the generation of additional jobs and a mix of uses;
- Retaining a public appreciation of the Building through a variety of measures, to be secured via a planning obligation.
- Delivering a design of high quality architecture that would be well-related to the surrounding context, including preserving and enhancing the character and appearance of the conservation areas and setting of nearby listed buildings;
- Resulting in an enhancement to the significance of the listed building
- Delivering a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the building; and
- Contributing to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development which would promote other means of travel such as cycling and walking.

7.8 In light of the above, we respectfully request that LBC grants planning permission and listed building consent for the Proposed Development.