

**NO. 19 PARK SQUARE EAST
LIMITED**

**THE DIORAMA, NO. 19 PARK
SQUARE EAST,
LONDON, NW1 4LH**

PLANNING STATEMENT

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

FEBRUARY 2020

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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 19 Park Square East Limited (“the Applicant”) to the London Borough of Camden (“LBC”) for the refurbishment and extension at No. 19 Park Square East, London, NW1 4LH (“the Site” / “the Building”), reinstalling the original plan form and provide a single-family dwelling (**Section 2**).
- 1.2 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 for No. 19 Park Square East, alongside two other applications for the conversion of No. 17 to another residential townhouse and No. 18 to office accommodation, seeks to return the Site back into three independent buildings (**Section 4**)
- 1.3 The Site is No. 19 Park Square East, which is currently connected to the former Diorama at No. 17 and No. 18 Park Square East, which forms separate applications. It is located within the London Borough of Camden on the private road, Park Square East, close to Regent’s Park. The Building was in residential use until the 1990s when it was combined with the adjacent properties and used as institutional offices. It has been vacant since 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
- 1.6 The Scheme ensures that the Site is brought back into use, through the creation of a high quality residential space with modern and efficient floorplates. Returning the building back into its original use would result in an enhancement to the significance of the listed building (**Section 6**).
- 1.7 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 19 Park Square East Limited (“the Applicant”) to the London Borough of Camden (“LBC”) for the refurbishment and extension at No. 19 Park Square East, London, NW1 4LH (“the Site” / “the Building”), reinstalling the original plan form and provide a single-family dwelling.
- 2.2 The proposed development (“the Scheme” / “the Proposed Development”) follows on from previous application(s) by the freeholder, the Crown Estate, to convert the 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 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 for No. 19 Park Square East, alongside two other applications for the conversion of No. 17 to another residential townhouse and No. 18 to office accommodation, seeks to return the Site back into three independent buildings.
- 2.4 This Planning Statement covers the Application to convert and extend No. 19 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. 19 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 The first 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 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 (i.e. this Application), relating to no. 19 Park Square East, also seeks the conversion of the property 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 application, prepared by Marek Wojciechowski Architects (“MWA”).
- 2.10 The description 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).
- 2.12 The new project team and Applicant have undertaken further consultation with LBC, from February 2018 onwards, which has informed the design of the Scheme, by addressing comments raised during this 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 public engagement with the history of the Site (all relating to no. 18 only).
- 2.16 The final scheme has been amended 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 is 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 19PSE-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 19PSE-2: Drawing Schedule	Montagu Evans
6.	Site Location Plan	MW-A
7.	Application Drawings	MW-A
8.	Design and Access Statement	MW-A
9.	Planning Statement	Montagu Evans
10.	Heritage Statement	Bidwells
11.	Basement Impact Assessment	CET
12.	Geotechnical Report on Ground Investigation	CET

13.	Phase 1 Preliminary Risk Assessment	CET
14.	Construction Method Statement (inc. Structural Drawings)	Form
15.	Flood Risk Assessment	Form
16.	Acoustic Report	RBA
17.	Sustainability Statement	Cundall
18.	Daylight and Sunlight Report	Hollis
19.	Draft Construction Management Plan ProForma	Motion
20.	Archaeological Desk-based Assessment	RPS
21.	Photographic Survey	MWA

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 a mixed use development through the provision of residential townhouses on this Site and subdividing parts of the building to form office floorspace (subject to separate applications);
- Ensure that the Site is brought back into its optimum use, through the creation of high quality residential space with modern and efficient floorplates;
- 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, returning the building back to its original use;
- Deliver a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the building; and
- 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.

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 0.01 hectares.
- 3.2 For the purpose of this Application, the Site is No. 19 Park Square East. It is currently connected to the former Diorama at No. 17 and No. 18 Park Square East, which forms separate applications. 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 forms part of the Grade I listed terrace running north-south. The property was built in the 1820s, as a residential townhouse.
- 3.5 The Building, which forms part of a series of 12 terraced properties, designed by John Nash, comprises four storeys, with two bays across, plus a part lower ground level.
- 3.6 The Building has undergone major alterations during a number of periods in history, with most recently having been adapted and combined to form a larger building (nos. 17-19 Park Square East), which 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.
- 3.7 The Building is currently linked internally with nos. 17 and 18 Park Square East, although is to be subdivided as part of this Application and other applications for these properties, submitted concurrently.
- 3.8 The existing building comprises approximately 350 sqm of gross internal area within No. 19 Park Square East. This does not include the floorspace for nos. 17 and 18.
- 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, which 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 (i.e. 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 subject buildings form 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, archivolts 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 forms part of the Regent's Park Conservation Area

3.22 The 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);
- 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 Being situated within north London, 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 existing buildings have 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 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, the former Diorama building 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 buildings were combined 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 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 was 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 In 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 Princes’ 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 2** of this Statement, the Application seeks planning permission and listed building consent for the refurbishment, extension and conversion of the existing listed building back to single residential use.

4.2 The Scheme would involve:

- Change of use of existing building from sui generis, back to its original 'C3 Residential' use; to create a single-family dwelling;
- Removal of non-original services, fixtures and fittings associated with its current institutional use;
- Reinstating the plan form of the original property;
- Lightweight extension at the rear of ground floor;
- Lowering of the front vaults floor to increase floor to ceiling height;
- Excavation to the rear garden in preparation for proposed accommodation;
- Internal refurbishment; and
- The demolition of non-original floor in preparation to reinstate at a level commensurate with rest of property.

4.3 During the pre-application stage, as set out in **Section 2**, 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.

Residential Townhouse

4.5 The Proposed Development seeks reinstate to divide no. 17 from the remainder of the building to create a self-contained residential townhouse. This involves the conversion of approximately 350 sqm from sui generis to Class C3, providing four bedrooms.

4.6 The historic plan form of the townhouse is reinstated with a dining room to the front of the property at ground floor and kitchen to the rear, with staircase situated in the centre of the property.

4.7 A rear extension to the property is proposed, which extends into the rear yard. The glass extension provides a breakfast area adjacent the kitchen, as well as terrace space for outdoor seating.

4.8 A reception room and study is provided at first floor level in a similar layout to the ground floor. At second and third floor levels, the property expands into the upper levels of no. 18, which is to be divided between the demise of nos. 17 and 19 Park Square East. These levels provide the four double bedrooms, bathrooms and dressing rooms.

- 4.9 The basement floor level, which includes further excavation from the existing, provides supporting functions to the main house, with media room, gym and changing / shower facilities. The vaults are to be excavated to provide additional storage space, plant areas and laundry rooms.

Physical Alterations

- 4.10 There are no alterations to the front elevation other than the careful refurbishment of the front door and windows, cleaning and restoration of the stone steps and re-painting of all railings to match existing.
- 4.11 To the rear of the Building, brickwork would be locally repaired and repointed. The new glazed extension would be carefully chased into the brickwork and sealed with a slim line silicon joint. Windows currently situated on the wall of no. 18 are to be infilled with brickwork, matching the existing, to prevent overlooking between the separated uses.
- 4.12 A number of internal alterations to the Building are required as part of the buildings conversion back to residential use. Most notably, existing doorways between the properties are to be infilled to provide separation between nos. 17, 18 & 19.
- 4.13 All historic elements of the Building would be retained, with a few modern elements removed as part of the conversion, including the replacement of commercial services with domestic services.
- 4.14 Full descriptions of the proposed internal works are set out within the Heritage Statement.

Parking, Access and Storage

- 4.15 The Proposed Development is, for the most part, 'car free' and would not provide any on-site car parking. Park Square East and Peto Place are both private roads where parking would be available, but no additional car parking is being created by this Application.
- 4.16 The sole and main access will be via the front door on Park Square East. There is no rear access to Peto Place. Servicing of the property would be from Park Square East.

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 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 (March 2019):

- 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, forming part of a larger building with the adjacent two properties Park Square East. Although the building has been vacant for 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 No. 18 (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 However, nos. 17 and 19 have had a different history to no 18, as the properties were built as residential dwellings and were combined with the other properties in 1995. It does not, therefore, have the same historical public use that 'The Diorama' has had.
- 6.5 Converting the property back to its original residential use would be entirely appropriate and results in an enhancement to the significance of the listed building and conservation area as discussed in later in this section.

Principle of Residential Development

- 6.6 The Proposed Development accords with the current thrust of planning policy at national, regional and local level, which places an emphasis on achieving sustainable development. In particular, adopted plan policy is extremely clear that housing is a priority land use in Camden.
- 6.7 Housing delivery is a key objective of the NPPF and it advocates for sufficient amount and variety of land to come forward to significantly boost the supply of housing (paragraph 59).
- 6.8 Paragraph 67 of the NPPF also requires local planning authorities to ensure planning policies identify a sufficient supply and mix of sites taking into account their availability, suitability and likely economic viability. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements, and developable sites or broad locations for growth for 6-15 years. An appropriate buffer should be included to ensure choice and competition in the market (paragraph 73).

- 6.9 Paragraph 68 states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 6.10 London Plan Policy 3.3 (Increasing Housing Supply) states that there is a “*pressing need for more homes in London*”. Part D of the policy states that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing targets through the intensification of brownfield housing sites and mixed use redevelopment, including of surplus commercial capacity.
- 6.11 Table 3.1 of the London Plan identifies an annual target of 889 new homes per annum in Camden (8,892 in total from 2016 to 2025). The Draft London Plan (Table 4.1) seeks to increase this figure to 1,086 new homes per annum (10,860 in total from 2019/20 to 2028/29).
- 6.12 Emerging Draft London Plan Policy H2 (Small sites) states that small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites through planning decisions. This will:
- significantly increase the contribution of small sites to meeting London’s housing needs;
 - diversify the sources, locations, type and mix of housing supply;
 - support small and medium-sized housebuilders; and
 - support those wishing to bring forward custom, self-build and community-led housing.
- 6.13 Table 4.2 of the Draft London Plan sets out an annual target of 376 new homes within Camden to be provided on small sites. Emerging Policy H2(D) states that boroughs should apply a presumption in favour of the small housing development which provide less than 25 homes, on infill development and underused sites.
- 6.14 At the local level, Policy H1 (Maximising housing supply) aims to secure a sufficient supply of homes and maximise the supply of housing to exceed the target of 16,800 additional homes between 2015/16 and 2030/31 (including 11,130 additional self-contained homes).
- 6.15 Policy H1 states that self-contained housing is the priority land use of the Local Plan. The policy also states that LBC will resist alternative development of sites already identified through a current planning permission, unless it is shown that it is no longer developable for housing. Furthermore, where sites are underused or vacant, the maximum reasonable provision of housing will be expected.
- 6.16 The principle of prioritising the delivery of housing over other uses and maximising that delivery has long been established as acceptable in Camden.

- 6.17 As noted above, the principle of residential on this Site has already been established through its original use. The property was built as a residential dwelling and only converted to offices in the mid-1990s. It has, therefore, been in residential use for the majority of its lifetime and the proposals to convert it back to residential is justified in planning and heritage terms.
- 6.18 The Proposed Development would result in the creation of a single additional residential dwelling, which forms a family dwelling on a 'small site'. Nevertheless, the provision of a townhouse on this Site fully accords with the aims of the development plan and would contribute to LBC meeting its targets for housing delivery. The siting of residential development in this location, close to other residential uses should be supported.

Affordable Housing

- 6.19 Paragraph 62 of the NPPF requires planning policies to specify the type of affordable housing required and set policies for meeting this need on site, unless off-site provision or an appropriate financial contribution in lieu can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 6.20 The provision of affordable housing should not be sought for residential developments that are not major developments, other than in rural areas, as required by NPPF paragraph 62.
- 6.21 Policy 3.12 in the London Plan emphasises that a range of factors must be considered when assessing the level of affordable housing on a particular proposal. It states that:

"A) the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:

- a) current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8 and 3.10 and 3.11*
- b) affordable housing targets adopted in line with Policy 3.11*
- c) the need to encourage rather than restrain residential development (Policy 3.3)*
- d) the need to promote mixed and balanced communities (Policy 3.9)*
- e) the size and type of affordable housing needed in particular locations*
- f) the specific circumstances of an individual site."*

- 6.22 Local Plan Policy H4 (Maximising the supply of affordable housing) seeks to provide 5,565 additional affordable homes from 2015 to 2030 and aims for an appropriate mix of affordable housing types. LBC expects a contribution to affordable housing from all developments that include housing and provide one or more additional home.

6.23 The guideline mix, as set out in Policy H4 is 60% social-affordable rented housing and 40% intermediate housing and targets are based on an assessment of development capacity whereby 100 sqm (GIA) of housing is generally considered to create capacity for one home. The Policy identifies:

- *“a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity;*
- *an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings;*
- *where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;”*

6.24 The Proposed Development would provide a single residential unit within a listed building at 368 sqm (GIA), and therefore has a capacity for four homes based on the calculation set out in Policy H4. A payment-in-lieu of affordable housing is therefore acceptable on this Site.

Housing Mix

6.25 National planning policy contained within the NPPF requires a range of size, type and tenure of housing to address the need of different groups in the community, including affordable housing, families with children, older people and students. Paragraph 72 seeks to ensure that the size and location of homes will support a sustainable community and ensure that a variety of homes are provided.

6.26 Policy 3.8 (Housing Choice) of the London Plan seeks to ensure that new residential developments comprise a mix of unit sizes to address the housing needs of the local area. The policy does not, however, specify a precise mix of housing types.

6.27 Draft London Plan Policy H12 (Housing size mix) states that schemes should generally consist of a range of units and requires a consideration of the appropriate mix based on a number of qualitative criteria. This includes the need to deliver a range of affordable homes, the nature and location of the site, the aim to optimise housing potential and the role of one and two bedroom units in freeing up family housing.

6.28 The emerging policy sets out that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes, although schemes consisting of mainly one-person and/or one-bedroom units should be resisted.

6.29 Local Plan Policy H7 (Large and small homes) aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.

- 6.30 All housing development should contribute to meeting the priorities set out in the Dwelling Size Priorities Table, which identifies a high priority for two and three bed market units. However, Policy H7 also states that LBC will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, having regard to a number of considerations.
- 6.31 The Proposed Development would provide a single four-bedroom dwelling, which is a higher priority unit with Camden. Whilst the Site cannot provide a mix of units, it does meet the aims of Policy H7 with regard to providing a high priority housing unit. The four bedroom property is appropriate, given the building's current form and layout.

Housing Design

- 6.32 London Plan Policy 3.5 (Quality and Design of Housing Developments) states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. The policy adds that the design of new dwellings should take account of "factors relating to 'arrival' at the building and the 'home as a place of retreat', have adequately sized rooms and convenient and efficient room layouts".
- 6.33 The policy also states that LDFs should incorporate minimum space standards that generally conform to Table 3.3 of the London Plan, which is comparative to the Nationally Described Space Standards, introduced by the Government.
- 6.34 The property exceeds the minimum space standards for a four bedroom property, set out over five levels (B, G + 3).
- 6.35 Additionally, the Mayor's Housing SPG (2016) sets out a requirement for a minimum of 5 sqm of private outdoor space that should be provided for 1 – 2 person dwellings and an additional 1 sqm for each additional occupant (Standard 4.10.1). Emerging Plan Policy D4 seeks to move this into the Draft London Plan as policy.
- 6.36 Private outdoor amenity space is provided for the property through the provision of a terrace to the rear of the building at lower ground floor level.

Design Principles

- 6.37 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.”*

6.38 Chapter 7 of the London Plan sets out the Mayor’s policies on a number of issues relating to London’s places and spaces.

6.39 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”*.

6.40 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.

6.41 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."*

- 6.42 Policy D1 is supported by Camden's Planning Guidance on Design, adopted in March 2019.
- 6.43 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.
- 6.44 Full details of security is likely to come forward during detailed design and reserved by way of a planning condition.
- 6.45 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.
- 6.46 Due to the historic nature of the property and its Grade I listed status, it is not possible to adhere to Building Regulations with regards to access and step free access cannot be provided throughout the building.
- 6.47 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.
- 6.48 In accordance with policy requirements the proposals provide a sensitive design with alterations to the building that are appropriate and sensitive in the context of its historic character and interest.

Heritage Considerations

- 6.49 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).
- 6.50 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.”

- 6.51 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.
- 6.52 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).
- 6.53 The Heritage Statement provides a full summary of the heritage policy and guidance.
- 6.54 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.
- 6.55 LBC Local Plan Policy D2 (Heritage) outlines that the council 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.
- 6.56 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.”

- 6.57 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.”*

6.58 In relation to listed buildings, Policy D2 sets out that LBC 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.”*

6.59 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.

6.60 The Heritage Statement notes that there are no changes proposed to the front elevation or roof level, which are the elements of the building that make the most important contribution to the significance of the listed building as they are prominent features of the Nash scheme and Park Square East buildings.

6.61 Key internal historic features would be retained including the original floor plan, central staircase, chimney breasts, fireplace openings and front and rear door and window openings. A number of other historic features are to be retained or reinstated throughout the building.

6.62 Other internal alterations to the fabric of the building are considered to have a neutral impact on the significance of the listed building.

6.63 The proposed extension to the rear would be of high quality design that preserves historic fabric and hierarchy of the building, with a neutral impact on the significance of the listed building or conservation area.

6.64 The Heritage Statement concludes that the proposals would, overall, result in an enhancement to the significance of the listed building and conservation area through the reinstatement of the original intended residential use of the building and its sensitive refurbishment.

- 6.65 Overall, the Proposed Development would be acceptable in terms of according with the relevant policies on design and heritage, enhancing the significance of the listed buildings and the conservation areas, 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

- 6.66 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.
- 6.67 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.
- 6.68 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.
- 6.69 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.
- 6.70 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

- 6.71 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.
- 6.72 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.”*

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

6.74 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

6.75 Local Plan Policy A1 is supported by the Camden CPG 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.

6.76 A Daylight and Sunlight Report has been prepared by Hollis which determines the interior daylight and sunlight amenity conditions which may arise from the conversion of the property to residential. The assessment has been undertaken in accordance with the Building Research Establishment (“BRE”), “*Site Layout Planning for Daylight and Sunlight*”.

6.77 The proposed extension at roof level of the former Diorama building (no. 18) has been taken into account when assessing internal daylight levels, resulting in no. 19.

6.78 The results demonstrate that dining rooms, reception rooms and the master bedroom all meet the BRE targets. The kitchens, studies and rear bedrooms do not meet the

targets, however, given the constraints of the location and limited scope for alterations, this is considered acceptable. The proposed dwelling's main rooms at the front of the property all meet the sunlight targets.

- 6.79 Overall, the proposed dwelling would receive good levels of daylight and sunlight to its main rooms and are therefore considered acceptable in terms of living conditions.

Noise

- 6.80 LBC Local Plan Policy A4 (Noise and vibration) seeks to ensure that noise and vibration is controlled and managed.

- 6.81 LBC 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.

- 6.82 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.

- 6.83 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 identified the glazing requirements to ensure suitable noise levels are achieved at the proposed development.

- 6.84 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 and the single glazed sash windows will be retained.

Construction Management Plans

- 6.85 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).

- 6.86 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.

- 6.87 This demonstrates how construction impacts will be minimised, in relation to site activity during works and the transport arrangements for vehicles servicing the Site.

- 6.88 We note that this draft Pro Forma would 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

- 6.89 Overall, the Proposed Development has been designed to limit the impact on neighbouring residential (and other uses') amenity. The proposed extensions to the rear of the Building are minor and would preserve the amenity currently enjoyed by nearby residents and occupiers. 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

- 6.90 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."*

- 6.91 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."

- 6.92 Chapter 6 of the London Plan provides the regional guidance for transport.
- 6.93 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"*.
- 6.94 Policy 6.10 aims to bring about a significant increase in walking, by improving the quality of the pedestrian and street environment.
- 6.95 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.
- 6.96 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.

- 6.97 The Proposed Development, for the conversion of the Building, to form a single residential dwelling, alongside the subdivision and conversion of adjacent properties, is expected to generate a negligible number of additional trips and would have negligible impact on the public highway network, especially as the development is 'car free'. The Proposed Development on its own is likely to result in a reduction of trips. The majority of trips are likely to be made by walking, cycling or the use of public transport.
- 6.98 The Site is a highly accessible location with high public transport accessibility. The local area has minimal reliance on the private car. The Proposed Development would not provide any car parking.
- 6.99 The development would result in a negligible number of deliveries, which would be mainly contained to weekly food deliveries or parcels. This is not likely to result in a materially detrimental impact on the operation of the local highway network.
- 6.100 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.

Car Parking

- 6.101 The NPPF requires local authorities to consider parking provision within new developments based upon the accessibility of the development and the opportunities for public transport, and facilitate the provision of ultra-low emission vehicles.
- 6.102 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.
- 6.103 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 will be limited to spaces designated for disabled people where necessary and essential operating or servicing needs.
- 6.104 The Proposed Development does not provide any car parking spaces. As a result of its sustainable location and excellent accessibility to public transport and active travel modes, no additional car parking would be required. 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

- 6.105 Both the NPPF and the London Plan promote cycling in locations which can be made sustainable.
- 6.106 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.
- 6.107 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.
- 6.108 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.
- 6.109 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.
- 6.110 The Draft London Plan requirements for cycle parking are for residential units of more than 1 bedroom, should provide a minimum of two spaces for long-stay parking. There is no requirement for short-stay cycle parking in a scheme of this size.
- 6.111 The Proposed Development faces difficulty in being able to achieve the London Plan's minimum standards, due to the size of the existing building being converted and its historic plan form.
- 6.112 The ground floor of the property does not contain sufficient space to accommodate cycle parking. Alterations to the building are not possible to enable cycle parking provision without harming the historic interest of the building.
- 6.113 Storage space is provided within the basement level, and occupants would have the ability to store a bicycle in this location if desired.

Sustainability

- 6.114 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.
- 6.115 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 Proposed Development is a 'minor' scheme involving the conversion and refurbishment of a listed building to form a single residential unit.
- 6.116 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.
- 6.117 The London Plan contains a number of other adopted policies which are relevant to the sustainability of the development, including 5.9 (cooling and overheating) and 5.17 (waste capacity). Many of the GLA's policies are not suitable to be applied to minor developments.
- 6.118 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.
- 6.119 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.
- 6.120 Local Plan Policy CC2 (Adapting to climate change) requires development to be resilient to climate change and adopt appropriate adaptation measure, although many of those outlined within the policy are not applicable to a scheme of this size.
- 6.121 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 domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM domestic refurbishment.
- 6.122 This Planning Application includes a Sustainability Statement, prepared by Cundall, which demonstrates how the sustainable design and construction principles, and climate change adaptation measures, have been incorporated into the design.

- 6.123 The Camden Planning Guidance on residential refurbishments should meet the Part LB1 requirements for retained thermal elements, the GLA requirements as per policies 5.4 and 5.7. As this is a listed building, it is exempt from energy efficiency requirements as compliance would unacceptably alter the character and appearance of the building.
- 6.124 The building envelope has not been updated due to the historic sensitivities of the listed building, but the new extension thermal elements are based on the Part L1B minimum standards.
- 6.125 Through efficient mechanical, electrical and control systems, the CO2 emissions can be reduced during operation.
- 6.126 The Proposed Development can reduce site-wide embodied carbon emissions through reuse of the existing site materials and structure and careful selection of new building materials. The opportunity to reuse certain elements means that CO2 emissions associated with the procurement, manufacture and transportation of new materials can be reduced.
- Choosing materials with a low overall environmental impact, with best performing ratings from the 'Green Guide';
 - Maximising the use of timber for structural and finishing purposes;
 - Materials sourced from local suppliers;
 - Specifying materials with high-recycled content;
 - Using insulation materials with zero Ozone Depleting Potential and low Global Warming Potential.
- 6.127 The Proposed Development would aim to minimise internal and external potable water usage and discourage the disposal of waste to landfill through good waste management during both operation and construction.
- 6.128 The Statement by Cundall also sets out the numerous sustainable approaches to pollutants, ozone depletion, construction management and transport matters.
- 6.129 Overall, the Scheme has been designed to incorporate sustainability features, with low environmental impact central to its design. The Proposed Development is therefore in accordance with adopted policy.

Basement Development

- 6.130 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.*"

6.131 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:

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

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

6.133 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.

6.134 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.

6.135 The Proposed Development includes the extension of the existing basement under the site footprint, and lowering the floors levels in the 'vault' section. The proposed scheme will be implemented by a series of 'hit and miss' underpinned walls. A Basement Impact Assessment (BIA) has been prepared by CET which assesses the impact of the proposals.

6.136 The Basement Impact Assessment sets out that:

- It is unlikely that the basement would cause any significant adverse impact on groundwater flows as basements already exist in all four directions.
- The increase in impermeable surface area is insignificant in terms of the scale of the scheme, the Site and the impact on surface water.
- The nearest walls have been classified as damage category 1 'very slight' on the Burland scale, or lower.

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

- 6.138 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.
- 6.139 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.
- 6.140 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.
- 6.141 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.
- 6.142 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.

Waste and Recycling

- 6.143 Camden 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.
- 6.144 Waste storage and recycling bins will be provided in large compartmented storage units in the kitchen. Refuse will be periodically taken out by occupants from the kitchen to the kerbside on the relevant collection date.

Community Infrastructure Levy

- 6.145 Within this Application, consideration is given to the 'MCIL2' requirements which came into effect on 1 April 2019 with a rate of £80 per sqm for residential floorspace.
- 6.146 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

£500 per sqm rate for residential developments within Zone C (Highgate and Hampstead area).

- 6.147 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 no. 19 Park Square East as part of its change of use to form a residential townhouse, and associated physical alterations.
- 7.2 The Proposals form part of a comprehensive development to refurbish and convert the Grade I listed properties at nos. 17-19 Park Square East, which currently form a single building, and to subdivide these back into three separate properties. The Proposed Development, alongside a similar application for the conversion of no. 17 Park Square East to a residential townhouse and the conversion and extension of no. 18 (the Diorama) to office, would return them back 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 a mixed use development through the provision of residential townhouses on this Site and subdividing parts of the Building to form office floorspace (subject to separate applications);
 - Ensuring that the Site is brought back into its optimum use, through the creation of a high quality residential space with modern and efficient floorplates;

- 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, returning the building back to its original use;
- 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.