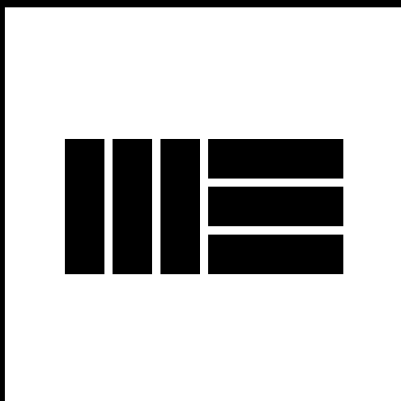


NO. 8 GREAT JAMES STREET, LONDON WC1N 3DA

PLANNING STATEMENT

APPLICATION FOR FULL PLANNING PERMISSION AND LISTED BUILDING CONSENT

DECEMBER 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 GFZ Investments (“the Applicant”) to the London Borough of Camden (“LBC”) for the conversion and refurbishment of No. 8 Great James Street, London, WC1N 3DA (“the Site” / “the Building”), to provide a single-family dwelling (**Section 2**).
- 1.2 The Proposals are part of a comprehensive development to reconfigure and refurbish the Grade II* listed properties at Nos. 7 and 8 Great James Street, which currently form a single building and the proposals seek to subdivide these into two separate properties. The Proposed Development for No. 8 Great James Street, alongside the other application for the conversion of No. 7 into another residential townhouse, seeks to return the Site back into two independent buildings (**Section 4**).
- 1.3 The Site is No. 8 Great James Street, which is currently connected to No. 7 Great James Street. It is located within the London Borough of Camden just to the south east of Great Ormond Street Hospital. The Building was in residential use until the 1960s when it was combined with the adjacent properties and used as institutional offices (**Section 3**).
- 1.4 The subject buildings form part of a group listing relating to Nos. 3-16 Great James Street which is Grade II* listed. The Site is also located within the Bloomsbury Conservation Area (**Section 3**).
- 1.5 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**).
- 1.6 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 GFZ Investments (“the Applicant”) to the London Borough of Camden (“LBC”) for the conversion and refurbishment of No. 8 Great James Street, London, WC1N 3DA (“the Site” / “the Building”), reinstating the original plan form to provide a single-family dwelling.
- 2.2 The Proposals are part of a comprehensive development to reconfigure and refurbish the Grade II* listed properties at Nos. 7 and 8 Great James Street, which currently form a single building, and to subdivide these into two separate properties. The Proposed Development for No. 8 Great James Street, alongside the other application for the conversion of No. 7 into another residential townhouses, seeks to return the Site back into two independent buildings.
- 2.3 This Planning Statement covers the Application to convert No. 8 Great James Street.

Planning Applications

- 2.4 This Planning Statement (“the / this Statement”) has been prepared to cover the Application for planning permission and listed building consent for No. 8 Great James Street, although should be read in conjunction with the other Statement, relating to No. 7 Great James Street, which is to be submitted concurrently.
- 2.5 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”).
- 2.6 The description of development for the two Applications, which seek full planning permission and listed building consent in each instance, are as follows:
- (1) No. 8 Great James Street
 - *“Change of use of building from office use (Class E) to residential (Class C3) to form a self-contained dwelling over LG, G + 4, conversion of loft to form fourth floor level, addition of dormer windows to roof, internal refurbishment and associated works.”*
 - (2) No. 7 Great James Street
 - *“Change of use of building from office use (Class E) to residential (Class C3) to form a self-contained dwelling over LG, G + 4 storeys, erection of single storey rear extension with terrace on first floor level, internal refurbishment and associated works.”*

Purpose and format of the Planning Statement

- 2.7 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.
- 2.8 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.
- 2.9 The scope of supporting information has been established with regard to the national and local list requirements.
- 2.10 A Document Schedule has been prepared for each of the two 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 8GJS-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 8GJS-2: Drawing Schedule	Montagu Evans
(6)	Site Location Plan	MW-A
(7)	Application Drawings	MW-A
(8)	Door Schedule	MW-A
(9)	Design and Access Statement	MW-A
(10)	Planning Statement	Montagu Evans
(11)	Heritage Statement	The Heritage Practice
(12)	Acoustic Report	Cundall
(13)	Sustainability Statement	Cundall
(14)	Daylight Sunlight Report	Hollis
(15)	Draft Construction Management Plan ProForma	Motion
(16)	Photographic Survey	MW-A

2.11 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;
- 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.

2.12 **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 two 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 east corner of the Borough, with the boundary to the City of London just to the east and the City of Westminster to the south of the Site. The site area comprises approximately 0.011 hectares.
- 3.2 For the purpose of this Application, the Site is No. 8 Great James Street. It is currently connected to No. 7 Great James Street, which forms a separate application. A Site Location Plan is enclosed within the submission.
- 3.3 The Site forms part of the Grade II* listed terrace running south-north. The property was built in the 1720s, as a residential townhouse.
- 3.4 The Building, which forms part of a series of 14 Georgian terraced properties, designed by J Metcalf, originally comprised of four storeys and basements with 3 windows on each level.
- 3.5 The Building has undergone several alterations during its history, with the largest change being its adaptation and combination to form a larger building (Nos. 7 and 8) which was occupied from the mid-1960s as an office workspace. The Building is currently occupied by the Solicitors, Monro Wright & Wasbrough LLP.
- 3.6 The Building is currently linked internally with No. 7 Great James Street via a single door at each level from ground upwards and subdivision is proposed both as part of this Application and the corresponding application for No. 7.
- 3.7 The existing building comprises approximately 449 sqm of gross internal area within No. 8 Great James Street. This does not include the floorspace for No. 7.
- 3.8 The Building is Grade II* listed and the Site is located within Bloomsbury Conservation Area. A large proportion of buildings / spaces within this area are listed, which includes the opposite terrace on Great James Street and Coram’s Fields, a Grade II listed playground and memorial pavilion.
- 3.9 A full description of the existing building is provided within the Design and Access Statement and Heritage Statement.

Surrounding Area

- 3.10 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. The surrounding area is most renowned for its history of strong literary and publishing connections.
- 3.11 As set out above, the Site is located within the Bloomsbury Conservation Area which is characterised by its formally planned arrangement of streets enclosed by mainly three and four storey developments. The urban character of the broad streets is interspersed by formal squares which provide landscape dominated focal points to the area. Russell Square, Queen Square Gardens, Brunswick Square Gardens and Coram’s Fields among many more, are located within close proximity to the Site.
- 3.12 The terraced houses extend both north and south of the Site, forming Great James Street which is the continuation of Bedford Row, north of Theobalds Road. Theobalds Road (A401) is a busy thoroughfare running east-west which leads onto the areas of Clerkenwell and Farringdon.
- 3.13 Great James Street is also connected to Rugby Street and Millman Street to the north but is pedestrianised beyond the turning to Northington Street on its eastern side.

- 3.14 The architecture of the surrounding area is predominantly of the Georgian era with the exception of Millman Place, a post-war development that extends into Millman Street via a second floor pedestrian bridge.
- 3.15 To the north west of the Site lies the Great Ormond Street Hospital, a world class leading children's hospital. The Charles Dickens Museum, the author's former home, is situated to the north east of the Site.

Heritage

- 3.16 The subject building forms part of a group listing relating to Nos. 3-16 Great James Street (and attached railings) which is Grade II* listed.
- 3.17 The list entry (ref. 1113197) states:

"14 terraced houses. 1720-24. For J Metcalfe. Brown brick, upper storeys with some later refacing in multi-coloured stock brick. No.3 refaced in yellow stock brick.

EXTERIOR: 4 storeys and basements. 3 windows each. Segmental red brick arches and dressings to flush frame windows, some with glazing bars and some with reeded frames with roundels. Parapets. Wooden, architraved doorcases. Nos 3 and 4 with half pilasters, plain pediments, patterned fanlights and panelled doors. Nos 5, 7 and 10-16 with enriched carved brackets carrying hood with panelled soffits, most with patterned radial fanlights and panelled doors. No.6 with engaged columns (Tower of Winds), frieze with festooned urns, dentil pedimented cornice, round arched doorway with fanlight and panelled door. Nos 8 and 9 with pilasters, dentil cornices, patterned radial fanlights and panelled doors. Between the houses, lead rainwater heads with lion masks and lead pipes. At 2nd floor level of No.16, a very worn stone cartouche inscribed "Great James Street 1721".

INTERIORS: most houses with good panelling; open staircases with turned balusters, column newels and carved brackets to treads.

SUBSIDIARY FEATURES: attached cast-iron railings to areas, with urn or torch flambe finials. No.14 was listed on 14/05/74."

- 3.18 The Site forms part of the Bloomsbury Conservation Area which contains a number of historic buildings and designated heritage assets. Great James Street itself is built up of terraced townhouses of four storeys in height which are also the predominant building type on the larger conservation area. It is in close proximity (within 100m) to the following assets:
- Nos. 26-37 and 39-40 Great James Street (and attached railings) (Grade II*);
 - No. 38 Great James Street (Grade II);
 - Nos. 23, 24 and 25 Great James Street (and attached railings) (Grade II);
 - Nos. 21 and 23 Great James Street (and attached railings) (Grade II);
 - No. 20 Great James Street (and attached railings) (Grade II);
 - Rugby Public House (Grade II);
 - No. 7 Rugby Street (Grade II);
 - No. 9 Rugby Street (Grade II);
 - No. 13 Northington Street (Grade II);
 - No. 23 Bedford Row (and attached railings) (Grade II);
 - K2 Telephone Kiosk Outside No. 23 Bedford Row (Grade II); and
 - K6 Telephone Kiosk Outside No. 25 Bedford Row (Grade II).

Accessibility

- 3.19 The Site has a Public Transport Accessibility Level (PTAL) of 6b which is categorised as 'excellent', as it is located in close proximity to a variety of public transport routes.

- 3.20 The nearest London Underground station is Holborn (Central and Piccadilly lines), located approximately 450 metres south west of the Site, with Chancery Lane (Central line) situated approximately 480 metres south east and Russell Square (Piccadilly line) located approximately 560 metres north west of the Site.
- 3.21 Being situated within north London, the Site is also located within close proximity to both London King's Cross and Euston, with all other national rail stations in London accessible via its excellent Underground links.
- 3.22 The Site is highly accessible to London's bus network. The nearest bus stop is approximately 150 metres from the Site at Red Lion Street (with seven routes operating). In addition, approximately 180 metres east of the Site is Gray's Inn Road bus stop (with eight routes operating).

Site and Planning History

Site Background

- 3.23 At No. 16 Great James Street is a cartouche which dates the street to 1721. Historic England makes reference to J Metcalfe who designed the terrace elevation and interiors of the listed properties.
- 3.24 Nos. 7 and 8 Great James Street were built as houses and were occupied as townhouses for the majority of their history until the 1960s. They were converted into office use at least before 1964. This is not an uncommon change within the terrace as many of the properties in Great James Street have historically and more recently been occupied by legal firms due to their proximity to Gray's Inn and Lincoln's Inn. In recent years, there has been an increasing trend to return townhouses to their original use as single family dwellings.
- 3.25 Since the date it was built (between 1720 and 1724), the property has undergone several alterations. No.8 was at one stage laterally amalgamated with No.9, (as noted in the 1911 census where it is listed as a single property) although no longer linked and is instead linked to the adjacent No.7.
- 3.26 The buildings are likely to have been affected by bomb damage during World War II when a high explosive bomb fell in Cockpit Yard, just behind No.9. The Heritage Statement provides a full history of known changes to the property.

Planning History

- 3.27 A planning history search of LBC's online planning register was undertaken and the following applications are of considered to be of relevance.
- 3.28 On 3 July 2015, planning permission and listed building consent (refs. 2015/0748/L & 2015/0450/P) was granted for "alterations to numbers 8 and 9 Great James Street including new Portland stone steps, repair and reinstatement of railings, and repair of the door case to number 9 only."
- 3.29 On 19 October 1990, listed building consent (ref. 9070132) was granted for the "alteration to the toilet accommodation formation of an opening in the basement centre wall general repairs and redecoration as shown on drawing number PB12/01."

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 subdivision, reconfiguration, refurbishment 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 office use (Class E), back to its original residential' use (Class C3); to create a single-family dwelling;
- Installation of air conditioning to principal front rooms, with external condenser located at roof level;
- Replacement of all non-original windows;
- Removal of non-original joinery and fittings;
- Minor reconfiguration of plant layout;
- Refurbishment and reinstatement of original floor finishes, wall panelling and ceilings.
- Conversion of loft space into bedroom space and bathroom suite;
- Addition of dormer windows to roof level; and
- Removal of roof to non-original extension adjacent to closet wing at ground floor to create an external courtyard.

4.3 Further details of the Scheme are set out within the Design and Access Statement prepared by MWA which accompanies this submission.

Residential Townhouse

4.4 The Proposed Development seeks to reinstate and divide No. 8 from No. 7 to create a self-contained residential townhouse. This involves the conversion of approximately 449 sqm from Class E to form a 473 sqm Class C3 dwelling, providing four bedrooms.

4.5 A family room and gym are provided at lower ground floor level, in addition to a store room with a separate wine store, shower and separate powder room, laundry room and plant room. At ground floor level, a dining room is proposed at the front of the property, with a kitchen situated in the centre and breakfast room and courtyard towards to the rear. Leading up the first floor level is a large study situated between a reception room fronting the property and a powder room to the rear.

4.6 The bedrooms are located on the upper levels of the property, with the master suite and two dressing rooms, along with an ensuite located on the second floor level. At third floor level are two bedrooms both with ensuites and a separate dressing room. The final bedroom is located within the former loft space, which has been converted to form a new fourth floor level (plus new dormer windows to the roof) with a separate bathroom.

Physical Alterations

4.7 As set out above, the proposals seek a number of internal and external alterations to the building.

4.8 The principal works include the removal of the roof to the non-original "strong room" to create a courtyard garden (and resulting in the loss of 12 sqm of internal area). In addition to the conversion of the existing non-original loft space into a habitable room and bathroom suite, with several dormers and addition of a small flat roof connecting the double pitch roofs to match the massing at No.7.

4.9 Other external alterations including the replacement of non-original fenestration with traditionally detailed timber windows. Where possible, the existing materials are to be retained and refurbished, whilst the new flat roof area and dormers are to contain traditional materials and detailing to complement the host building.

4.10 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. 7 and 8, as well as the internal reconfiguration of the floors to enable its conversion to a domestic property.

- 4.11 All historic elements of the Building would be retained, with a modern office elements removed as part of the conversion, including the replacement of commercial services with domestic services.
- 4.12 Furthermore, restoration of the original decorative moulding and wall panelling will be undertaken where possible and replicating where necessary. The existing original floorboards will also be exposed and utilised as the floor finish to the principle floor levels.
- 4.13 Full descriptions of the proposed internal works are set out within the Design and Access Statement.

Parking, Access and Storage

- 4.14 The Proposed Development is, for the most part, 'car free' and would not provide any on-site car parking. Presently, Great James Street holds car parking spaces for resident permit holder only, but no additional car parking is being created by this Application.
- 4.15 The sole and main access will be via the front door on Great James Street. There is no rear access. Servicing of the property would be from Great James Street.
- 4.16 Cycle parking is to be provided on site, with space earmarked for two cycle spaces, within the vault area.

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 2021.

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 (February 2020) sets out that a review of the Local Plan is likely to commence in late 2020 early 2021. In the meantime, LBC is focusing on updating its 2013 Site Allocations Local Plan with adoption in Autumn Winter 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 The GLA is currently consulting on the following relevant supporting documents:
- Good Quality Homes for all Londoners (draft October 2020); and
 - Circular Economy Statements (draft October 2020).
- 5.17 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);
 - Design CPG (March 2019);
 - Developer Contribution CPG (March 2019);
 - Energy Efficiency and Adaptation CPG (March 2019); and
 - Transport CPG (March 2019).

- 5.18 In addition to the above, the *Bloomsbury Conservation Area Appraisal and Management Strategy* (April 2011) is a material consideration in the determination of this Application.
- 5.19 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.
- 5.20 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

- 5.21 The Site is the subject of the following designations under the LBC Policies Map (March 2019):
- Central London Area (i.e. Central Activities Zone)
 - Metropolitan Walk;
 - Primrose Hill to St. Paul's Cathedral Protected Viewing Corridor; and
 - Bloomsbury Conservation Area.
- 5.22 As noted previously, the Site forms part of Grade II* listed terrace.

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 Office Floorspace

6.2 The lawful use of the Building is office use which falls under Class E of the Use Classes Order Amendment 2020 (B1a under the previous version of the UCO). The proposals, which seek to convert the building from office to residential use, has had regard to the relevant policies within the Camden Local Plan and the Employment Sites and Business Premises CPG (March 2018).

6.3 Local Plan Policy E2 (Employment premises and sites) states that the Council will protect sites that are suitable for continued business use, in particular premises for small businesses, businesses and services and those that support the functioning of the CAZ and local economy.

6.4 The policy notes that Camden will resist development of business premises for non-business use unless it is demonstrated that the building is no longer suitable for its existing business use and the possibility of retaining, reusing or redevelopment the site for similar or alternative business has been fully explored over an appropriate period of time.

6.5 The building is unable to fully meet the criteria set out within the policy as the building is presently occupied. It is in a reasonable condition where an office use could continue although is not capable of being modernised to meet current standards.

6.6 As an office building, the fit out is tired and dated, and has not been refurbished for a considerable period of time, owing to the long occupancy of the existing tenants. The building was originally designed as a single family dwelling house. As one would expect, the layout reflects the original use and is organised as a series of rooms off the hallway and stairs.

6.7 The physical plan form and constraints of the listed building would mean that it could not be upgraded to provide modern standards of office accommodation, without detriment to the special interest of the listed building. Whilst the office serves a certain purpose, the building has a number of main constraints including:

- Not fully accessible;
- Suffers from poor natural light to various parts
- It has a very inefficient cellularised layout for office accommodation;
- Outdated and poor services;
- Poor energy efficiency;
- No flexibility on the layout for tenants – due to listed status; and
- No ability to create secure self-contained units with own toilets and kitchenettes within significant alteration, intervention and refurbishment.

6.8 The Employment sites and business premises CPG provides further guidance on assessing proposals that involve a loss of a business use and the factors it will take into account.

6.9 As noted above, the Site is in a reasonable condition to allow the business use to continue, although with the current tenant coming to the end of their lease, an opportunity has arisen to convert the building back into its original use as a single family dwelling house.

6.10 The existing tenant is a firm of solicitors who have been occupying the building since 2012. The company has merged with another firm, meaning that the current premises at Nos. 7-8 Great James Street have become surplus to requirements. The change of use would not therefore result in the displacement of an existing business.

The Office Market

- 6.11 The LBC Employment Land Study (2014) sets out that there are a number of different markets that operate within the borough, the Central London, Camden Town and outer Camden office markets and each have distinctive sub-markets which attract different types of operators. The markets have developed due to differing occupier requirements for premises which shape the areas they choose to operate.
- 6.12 The existing building does not meet the requirements of these three office markets. Whilst located close to Midtown, near to the Central London office market, its small size and poor quality means it is unlikely to attract corporate occupiers who are looking for high quality office space in Central London. Despite increases in rental levels in Midtown, corporate occupiers still wish to locate to central locations rather than relocating to cheaper accommodation in the north of the borough.
- 6.13 The Building suffers from poor layout and lacks open floorplan which is sought after by start-up and micro businesses. It is more likely that SMEs would find more suitable spaces in Camden Town or Kentish Town where there is a growing hub of business space.
- 6.14 We have undertaken a review of office space on the market within the London Borough of Camden, with two searches, one for all office accommodation within LBC and the second for all office accommodation of a similar size (or less) as this Building. These searches were undertaken using the EGi property database.
- 6.15 The search for all available office accommodation within the London Borough of Camden showed there was 365 commercial properties for rent at the time that the search was conducted (6 December 2020). A significant proportion of these properties are within or adjacent to the Central Activities Zone to the south of the borough. However, the search also highlighted concentrations of office spaces to let around King's Cross, Camden Town and Kentish Town.
- 6.16 The search for properties within the London Borough of Camden that provided office space of up to 500 sqm shows that there were approximately 181 spaces available for rent at the time that the search was conducted (6 December 2020). Again, these properties remain predominantly in the south of the borough and in the Central Activities Zone. The searches also demonstrated that properties were available close to the site, including Emerald Street, Theobalds Road, with a concentration around the High Holborn and Chancery Lane. Many of these appear suitable for similar legal type professions.
- 6.17 It is therefore clear that there are numerous premises on the market that have been purpose-built for office uses and would fit the similar tenant requirements of the space currently within Great James Street. With the recent change to the Use Classes Order to enable more flexibility in commercial space, there is the potential for further space within LB Camden to come available for office use without the need for planning permission for its conversion.

Alternative Use as Residential

- 6.18 NPPF Paragraph 121 sets out that local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular:
- “they should support the use of employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres and would be compatible with other policies in this Framework.”*
- 6.19 The principle of residential development in this location is set out in further detail below. In the past 20 years, planning permission has been granted for the conversion of a large number of properties along Great James Street, which includes 10 out of 14 on the west side of the terrace and 7 out of 14 on the east side. The terraces, which include buildings that are located on Historic England's Heritage At Risk Register is therefore gradually returning to its former grandeur as a domestic street.
- 6.20 In considering developments affecting listed buildings, LBC must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

- 6.21 Paragraph 192 of the NPPF sets out that in determining applications, the LPA should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
- 6.22 In this case, considerable importance and weight should be attached to the impact of development on the heritage asset and its significance.
- 6.23 The proposed development will return the house to its original use as a single family dwelling and will have no adverse effect on the identified significance of the building. The Heritage Statement sets out that reinstatement would result in significant tangible as well as intuitive heritage benefits, resulting in substantial benefit to the architectural and historic interest of the grade II* listed buildings.
- 6.24 Benefits include the division of the building from No. 8, restoring the original access, vertical circulation and plan form. Missing architectural features such as panelling and chimney pieces would be actively conserved and restored through repair and replacement, and the development would result in the restoration of the building's character and enjoyment as a dwelling house.
- 6.25 Exceptional circumstances therefore exist when considering the loss of employment use under Policy E2 as the residential use of the building would be in the interest of preserving and restoring the listed building to its original use. On balance, the heritage benefits of reusing the building and the associated sensitive physical improvements to the building provide the justification for the loss of employment floorspace.
- 6.26 This conversion would be entirely appropriate and would result in an enhancement to the significance of the listed building and conservation area as discussed in later in this section.

Principle of Residential Development

- 6.27 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.
- 6.28 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).
- 6.29 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).
- 6.30 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.
- 6.31 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.
- 6.32 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).
- 6.33 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.
- 6.34 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.
- 6.35 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).
- 6.36 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.
- 6.37 The principle of prioritising the delivery of housing over other uses and maximising that delivery has long been established as acceptable in Camden.
- 6.38 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-1960s. 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.
- 6.39 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

- 6.40 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.
- 6.41 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.
- 6.42 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.”*
- 6.43 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 homes.

6.44 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; and*
- *where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;”*

6.45 The Proposed Development would provide a single residential unit within a listed building at 473 sqm (GIA), and therefore has a capacity for five 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

6.46 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.

6.47 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.

6.48 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.

6.49 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.

6.50 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.

6.51 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.

6.52 The Proposed Development would provide a single four-bedroom dwelling, with family accommodation being a high priority 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

6.53 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”.

- 6.54 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.
- 6.55 The property exceeds the minimum space standards for a four-bedroom property, set out over six levels (B, G + 4).
- 6.56 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.
- 4.17 Private outdoor amenity space is provided for the property through the provision of an external courtyard at ground floor level, which is created through the removal of the non-original strong room and provides circa. 10 sqm for the new residents to enjoy. The Design and Access Statement sets out various options for accessible open space within the area and beyond Central London, with plenty of options.

Design Principles

- 6.57 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.”*
- 6.58 Chapter 7 of the London Plan sets out the Mayor's policies on a number of issues relating to London's places and spaces.
- 6.59 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”*.
- 6.60 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.
- 6.61 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.”*

- 6.62 Policy D1 is supported by Camden’s Planning Guidance on Design, adopted in March 2019.
- 6.63 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.
- 6.64 Full details of security are likely to come forward during detailed design and reserved by way of a planning condition.
- 6.65 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.
- 6.66 Due to the historic nature of the property and its Grade II* 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.
- 6.67 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 how it responds to the context of the existing building and surrounding area.
- 6.68 In accordance with policy requirements the proposals provide a sensitive design with alterations to the building that are appropriate in the context of its historic character and interest.

Heritage Considerations

- 6.69 The existing building is Grade II* listed and forms a group listing alongside the other properties along Great James Street. The Site is also located within the Bloomsbury Conservation Area and owing to its Central London location, the Site is within the proximity to a number of other listed buildings.
- 6.70 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.”*
- 6.71 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.
- 6.72 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).
- 6.73 The Heritage Statement provides a full summary of the heritage policy and guidance.

- 6.74 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.
- 6.75 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.
- 6.76 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.”*
- 6.77 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.”*
- 6.78 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.”*
- 6.79 A Heritage Statement has been prepared by the Heritage Collective, and should be read alongside this Planning Statement, the proposed drawings and the Design and Access Statement prepared by MWA.
- 6.80 The Statement confirms that the property is of high historical significance as it is of exceptional historical and aesthetic value plus considerable evidential value.
- 6.81 The proposed development will return the house to its original use as a single family dwelling and will have no adverse effect on the identified significance of the building. As noted above, reinstatement would result in significant tangible as well as intuitive heritage benefits resulting in substantial benefit to the architectural and historic interest of the grade II* listed buildings.
- 6.82 Benefits include, the division of the building from No. 7, restoring the original access, vertical circulation and plan form. Missing architectural features such as panelling and chimney pieces would be actively conserved and restored through repair and replacement, and the development would result in the restoration of the building’s character and enjoyment as a dwelling house. The conversion of the fourth-floor level to habitable accommodation is an important component of the scheme which would mirror the adjacent roof profiles and not result in the loss of historic fabric.

- 6.83 The appearance of the building would remain unaltered from the front elevation and the improvement of the character area will be brought about through replacing non-original windows with early 18th century sashes. Similar alterations will take place to the rear façade, predominantly the replacement of all non-original windows which would include reinstating the staircase window and therefore would enhance the character and contribution made by the 18th century staircase.
- 6.84 At roof level, the tiles would be stripped and insulated to meet modern standards and authentic clay tiles would reclad the roof.
- 6.85 A better understanding of the original envelope of the house would be achieved through the separation of the ground floor rear extension with access to the current strong room removed, providing light and ventilation to the basement. This would also create much needed external amenity space for the house.
- 6.86 Internally, the main spaces on all floors are to be retained, with the original form and proportion restored. Whilst there would be some minor modifications to allow the creation of bathrooms, there would be no loss of historic fabric or any feature which contributes positively to the character and special interest of the listed building. The creation of the new staircase and loft accommodation has been brought forward based on evidence of other buildings in the terrace and these features would not cause harm to the listed building.
- 6.87 The Heritage Statement concludes that *“the proposals would not harm the significance and special interest of the listed building and would significantly enhance its special character largely through restoring the building back to its original use, layout, character and appearance. It is therefore considered that the proposed alterations would importantly improve its current poor state of repair reverses its slow decay. The proposals are therefore considered to be acceptable in terms of historic environment statutory and policy provision and should be welcomed unreservedly.”*

Residential Amenity

- 6.88 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.
- 6.89 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.*
- 6.90 *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.”*

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

Impact on Amenity

- 6.92 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.
- 6.93 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*".
- 6.94 The report concludes that the additional massing on the development site is limited to the addition of two dormer windows at fourth floor level and would not adversely impact neighbouring daylight and sunlight amenity when assessed in accordance with BRE recommendations.

Noise

- 6.95 LBC Local Plan Policy A4 (Noise and vibration) seeks to ensure that noise and vibration is controlled and managed.
- 6.96 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.
- 6.97 An Environmental Noise Assessment has been undertaken by Cundall 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.
- 6.98 The Site has been assessed to be at 'low' to 'medium' risk of adverse effects from noise, with the main source of noise being from road traffic on the A401, to the south. Based on the background noise and relevant Building Regulations, the project has identified the requirements for glazing, ventilation openings and façade construction to ensure suitable noise levels are achieved at the proposed development.
- 6.99 Further, the report identified that no additional mitigation is required to meet noise emission limits with regard to plant noise levels.
- 6.100 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

- 6.101 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).
- 6.102 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.
- 6.103 This demonstrates how construction impacts will be minimised, in relation to site activity during works and the transport arrangements for vehicles servicing the Site.
- 6.104 We note that if required, 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

- 6.105 Overall, the Proposed Development has been designed to limit the impact on neighbouring residential (and other uses) amenity and ensure that future residents are afforded appropriate levels of amenity. The proposed alterations to 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 construction and operation of the building to ensure health and well-being in the local area is maintained.

Transport

- 6.106 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.”*
- 6.107 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.”*
- 6.108 Chapter 6 of the London Plan provides the regional guidance for transport.
- 6.109 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”*.
- 6.110 Policy 6.10 aims to bring about a significant increase in walking, by improving the quality of the pedestrian and street environment.
- 6.111 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.
- 6.112 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 6b), which ensures excellent links to the Underground, National Rail and bus services.
- 6.113 The Proposed Development, for the conversion of the Building, to form a single residential dwelling, alongside the subdivision and conversion of the adjacent property, 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.
- 6.114 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.
- 6.115 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.
- 6.116 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

- 6.117 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.
- 6.118 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 will 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. 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

- 6.121 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 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.
- 6.127 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.
- 6.128 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.
- 6.129 Storage space is provided within the basement level, and occupants would have the ability to store a bicycle in this location if desired, with two spaces shown on the Application drawings.

Sustainability

- 6.130 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.
- 6.131 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.
- 6.132 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.
- 6.133 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.
- 6.134 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.
- 6.135 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.
- 6.136 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.
- 6.137 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.
- 6.138 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.
- 6.139 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.
- 6.140 The building envelope has not been updated due to the historic sensitivities of the listed building. In addition, the energy performance of the new roof will depend on the discovery strip out and therefore is to be confirmed.
- 6.141 Through efficient mechanical, electrical and control systems, the CO₂ emissions can be reduced during operation.
- 6.142 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; and
- Using insulation materials with zero Ozone Depleting Potential and low Global Warming Potential.

6.143 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.

6.144 The Statement by Cundall also sets out the numerous sustainable approaches to pollutants, ozone depletion, construction management and transport matters.

6.145 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.

Waste and Recycling

6.146 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.

6.147 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

6.148 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.

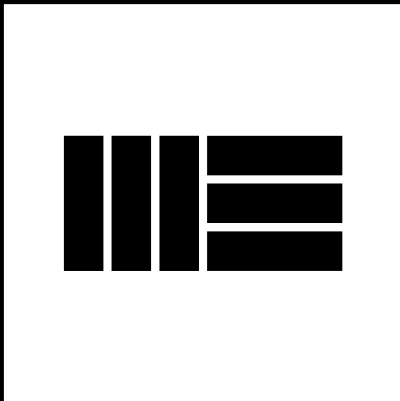
6.149 In addition to the above, LB Camden adopted its Community Infrastructure Charging Schedule in March 2015 which has applied since 1 April 2015. This outlines a rate of £500 per sqm rate for residential developments within Zone C (Highgate and Hampstead area).

6.150 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 conversion and refurbishment of No. 8 Great James Street as part of its change of use to form a residential townhouse, and associated physical alterations.
- 7.2 The Proposals are part of a wider development to reconfigure and refurbish the Grade II* listed properties at Nos. 7 and 8 Great James Street, which currently form a single building and the proposals seek to subdivide these into two separate properties. The Proposed Development for No. 8 Great James Street, alongside the other application for the conversion of No. 7 into another residential townhouse, seeks to return the Site back into two 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 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;
 - 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.
- 7.6 In light of the above, we respectfully request that LBC grants planning permission and listed building consent for the Proposed Development.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL