

**Proposed revisions to permission 2015/6112/P at 29-30 High Holborn
to change the mix and provide an enlarged flat at roof level**



**Planning, Design, Heritage and Access Statement
for
Westcombe Management**

***Brian Madge, BA, MA, MRTPI
Brian Madge Ltd
20 Westmead Road,
Sutton, SM1 4JT
020 8642 8753 & 07973 913025
bmadge224@aol.com***

INTRODUCTION

This statement supports an application to alter the internal layout permitted by consent 2015/6112/P and to erect a roof extension at 29 High Holborn. The consent has been commenced by reason of works to the ground floor. Hence the existing building has an extant planning permission for a residential extension and conversion which is under way, having started in March 2019 but subsequently suspended due to the covid pandemic.

The application was originally submitted in September 2020 but the Local Authority, Camden Council, decided on 26th October 2020 that a section 73 application was not appropriate given that “... *The proposed amendments would change the description of the development. The Court of Appeal decision Finney v Welsh Ministers [2019] EWCA Civ 1868 held that it is not lawful to use the powers under section 73 of the Town and Country Planning Act 1990 to amend the description of development on a planning permission. As such, the application has been closed on our system. You will need to submit a new application for full planning permission for the proposed changes...*”

Hence the application is resubmitted in full albeit it is a variation of an extant consent. This statement has been produced with full consideration of the National Guidance Documents, the Core Strategy and the Development Plan. The application includes plans by Fluent Architectural and Design Services. The application package also includes, for information, the approved and extant plans. The application plans are:

Holborn 29 High Holborn - FLU.1241.LP.01 - Location Plan
Holborn 29 High Holborn - FLU.1241.3.01 - Existing Ground & First Floor Plans
Holborn 29 High Holborn - FLU.1241.3.02 - Existing Second Floor Plan
Holborn 29 High Holborn - FLU.1241.3.03 - Proposed Ground and First Floor Plans rev A
Holborn 29 High Holborn - FLU.1241.3.04 - Proposed 2nd-6th Floor Plans Rev A
Holborn 29 High Holborn - FLU.1241.3.05 - Proposed 7th Floor Plan
Holborn 29 High Holborn - FLU.1241.3.06 - Proposed Front Elevations Rev A
Holborn 29 High Holborn - FLU.1241.3.07 - Proposed Rear Elevations
Holborn 29 High Holborn - FLU.1241.3.08 - Proposed Side Elevations
Holborn 29 High Holborn - FLU.1241.3.09 - Proposed Rear Street Scene Rev A
Holborn 29 High Holborn - FLU.1241.3.10 - Approved Ground and First Floor Plans
Holborn 29 High Holborn - FLU.1241.3.11 - Approved Second to Sixth Floor Plans
Holborn 29 High Holborn - FLU.1241.3.12 - Approved Front Elevations
Holborn 29 High Holborn - FLU.1241.3.13 - Approved Rear Elevations
Holborn 29 High Holborn - FLU.1241.3.14 - Approved Side Elevations

Additionally, an 'Energy & Sustainability Statement' by Doherty Energy is submitted, addressing energy, water usage and sustainability.

THE SITE AND ITS SURROUNDINGS

The site currently contains a six-storey building fronting High Holborn with a two-storey building to the rear, fronting Fulwood Place. The site is part of the Central London Area (as defined in the Camden UDP) and in an Archaeological Priority Zone.

The building at the rear is brick. The rear and flank elevations are utilitarian with a mix of materials including render, red and white brick, and plain flettons. There are external staircases accessing to Fulwood Place.

High Holborn is an area of change with a number of extensive mixed use redevelopments of varying architectural styles. Redevelopment of this building is not achievable by reason of the Conservation Area status and the quality of the High Holborn street frontage. The building is served by a passageway to Fulwood Place which accesses Grays Inn which contains a formal arrangement of buildings serving the legal community. The ground floor of the building runs through to Fulwood Place at the rear, however there is a void at first floor level between the front building and a two-storey office building at the rear of the site. The two-storey rear building and the High Holborn building are linked via a corridor at second floor level. The existing building is shown with its context below and overleaf:



The application site



Fulwood Place looking towards the site



Fulwood Place



The adjacent 31-33 High Holborn (7 storeys)

The site is in the Bloomsbury Conservation Area.

The extant consent (2015/6112/P) permits a 1st & 2nd floor 2-bedroom duplex, with three studio flats above.

Heritage significance

The site is located in an area with a range of uses as well as historical buildings. As a modern building it has a neutral effect on the character of the Conservation Area and there is no evidence of any earlier building fabric. None of this 20th century fabric has any inherent merit in architectural or heritage terms.

The roofscape is, in keeping with the general age and quality of the building, modern in character. Even with the extant consent it would be one of the lower buildings of the locality as demonstrated in the street scene. The heritage significance is thus confined to its general scale. The building and other unlisted buildings nearby, and their relationship to one another and the Bloomsbury Conservation Area collectively illustrate

the development of this part of London. They tell the story of change in this part of central London in the 19th and 20th centuries, the intensity of post-war change, and the effect of commercial pressures on older buildings.

In terms of English Heritage's 'Conservation Principles', the listed buildings and conservation area provide us with '*evidence about past human activity*' and, by means of their fabric, design and appearance, communicate information about its past. Subsequent alteration, demolition and redevelopment has not entirely removed the ability of the older townscape and intact historic buildings to do this; the Conservation Area and its listed buildings clearly retains sufficient historic. The contribution made by this part of 29 High Holborn is minimal.

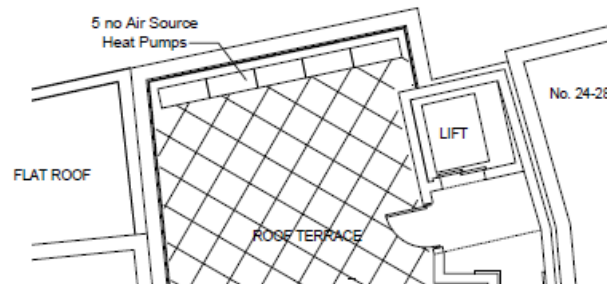
THE PROPOSAL

The proposal seeks to respond to changes in economic circumstances. The design concept flows from an evaluation of the building, planning policy and practical considerations. The most important context considerations are:

- ☐ The proposed mix is studio flats on the 1st, 2nd, 3rd and 4th floors with a 2-bedroom duplex on the 5th and new 6th floors
- ☐ The maintenance of character of the building and of the area. The design is traditional, repeating the themes of the main building
- ☐ A mix of flat types is proposed with the larger flat being a duplex on the upper floor closest to the roof terrace
- ☐ The maintenance of amenity for existing occupiers
- ☐ The proposal has minimal impact on the access of light to the adjacent buildings
- ☐ The adjacent No 31-33 is owned by the applicant. Whilst there are residential occupiers from second floor level upwards with some windows, these face to the north thus there are no sunlight implications
- ☐ The extension would not create any opportunity for overlooking to residential occupiers
- ☐ The use of the overall building will be mixed with offices facing High Holborn and flats facing the quieter environment of Fulwood Place
- ☐ A roof terrace is provided, screened by obscured glazing thereby protecting privacy
- ☐ The proposed revised development seeks to provide for five modest flats that are appropriately located and would assimilate easily into the streetscene
- ☐ The flats meet the national minimum floorspace standards
- ☐ Cycle storage is provided in the private ground floor lobby for each unit to encourage sustainable transport use
- ☐ Special consideration has been given to the external appearance, form, massing and materials from the key view points
- ☐ The scheme has been considered during the design process to comply with the core principles of Secured by Design and the principles described in Safer Places the Planning System and Crime Prevention.
- ☐ The companion sustainability report concludes:

- a) *The London Borough of Camden and the London Plan 2016 Policy 5.2 requires new residential developments to minimise and exhibit the highest standards of sustainable design and construction. The reduction in carbon dioxide emissions target has been set as zero carbon. The development should achieve a minimum of 35% over the Target Emission Rate, as defined by the Building Regulations 2013.*
- b) *The Application at 29-30 High Holborn, London WC1V 6AZ is for the redevelopment of the site to change the mix and provide an enlarged flat at roof level. The development will create a total of four studio flats and a two bedroom flat*
- c) *It is proposed that in order to meet the requirements of policy this development will adopt a high standard of design with regard to energy efficiency principles. It has been estimated that the proposed development will achieve a reduction in the carbon dioxide emissions through fabric and services efficiencies and a further reduction through the use on-site renewable energy generation. This results in a total of 41.0%. It is envisaged during detailed construction design, these figures can be improved.*
- d) *At planning stage it is not possible to produce the final reports on the energy demand, carbon dioxide emissions, based on the initial construction information. It is envisaged that during detailed design, the reduction in carbon dioxide emissions can be improved.*
- e) *This report has assessed the risk of overheating and the development has been identified as having a slight risk, which can be reduced by incorporating low G value glazing, internal shading by light coloured curtains or cross ventilation by opening the windows fifty percent of the time.*
- f) *The water usage has been assessed and although the actual water fittings have not been selected yet, the calculations show that it is possible for this development to achieve the requirements of the planning policy, thus minimising the impact of the development on the local water resources.*
- g) *This Energy and Sustainability Statement demonstrates that the proposed development complies with the requirements of planning policy with regard to carbon dioxide reduction, incorporation of low and zero carbon technologies and water consumption. It is for these reasons it is considered that this application should be viewed favorably by the London Borough of Camden.*

Plan FLU.1241.3.05a shows the energy requirement being met by Air Source Heat Pumps on the roof terrace as shown overleaf:



NATIONAL POLICY

The Government published the latest version of the revised National Planning Policy Framework in 2019. One of the key drivers for the revision was the need to deliver a sufficient supply of homes. For decision taking, there is a presumption in the Framework in favour of sustainable development and *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*

Turning to the specific subject areas, the NPPF states:

To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

A new provision of the NPPF is an emphasis on small sites, and the guidance notes:

68. 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. To promote the development of a good mix of sites local planning authorities should:

a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

The proposal is an example of this type of small site and provides an opportunity to create a good home which is responsive to local needs.

The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development. Planning policies and decisions should aim to ensure that developments 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 and should establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live. Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness. The design presents a well-conceived scheme meeting all current standards.

Paragraph 189 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. This is done by this statement which concludes that aside the frontage the heritage implications are limited. In not affecting the frontage the proposal passes the test of paragraph 190 that there is little impact on the heritage asset.

This analysis will conclude that the proposal sustains and enhances the significance of the heritage assets and puts it to viable uses consistent with their conservation (paragraph 191).

There is no harm to, or loss of, the significance of a designated heritage asset.

THE DEVELOPMENT PLAN

The Development Plan for the site comprises the London Plan 2016 together with the Camden Local Plan 2017. The Holborn area is largely characterised by a mix of offices, retail and residential.

Paragraph 2.31 of the Local Plan identifies the Council aspirations for the Holborn area and states:

The Council's aspirations for the Holborn area include:

- provision of a mix of land uses, with offices and housing as the predominate uses; and***

- *provision of appropriate retail, food, drink and entertainment and service uses in the area's Central London Frontage in accordance with the supplementary planning document Camden Planning Guidance on town centres, taking opportunities to introduce ground floor town centre uses where the continuity of the frontage is currently broken;*
- *development of a decentralised energy network;*
- *improvements to the street environment, in particular the pedestrian environment to and around Holborn Underground station;*
- *improved linkages and connections with the City of London, the Tottenham Court Road area and other neighbouring areas;*
- *making walking and 'way-finding' easier;*
- *the provision of improved cycling facilities, particularly for visitors;*
- *working with partners including TfL to relieve congestion at Holborn Underground station, including the Holborn station capacity upgrade;*
- *appropriate contributions to open space, community facilities, regeneration initiatives and employment and training schemes;*
- *high quality, sustainable design that respects its surroundings and conserves and enhances the area's heritage assets and wider historic environment; and*
- *improving community safety, including opportunities for crime and anti social behaviour.*

The proposal maintains a mixed use of the building with offices on the High Holborn frontage and perpetuates the design of the approved building. It will make a contribution to maximising housing supply as required by Policy H1, which states:

The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.

We will seek to exceed the target for additional homes, particularly self-contained homes by:

- a. regarding self-contained housing as the priority land-use of the Local Plan;*
- b. working to return vacant homes to use and ensure that new homes are occupied;*

c. resisting alternative development of sites identified for housing or self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for housing; and

d. where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site.

We will monitor the delivery of additional housing against the housing target, and will seek to maintain supply at the rate necessary to exceed the target. In seeking to maintain the housing supply, the Council will adjust the type and mix of housing sought, having regard to the financial viability of development, the sales or capital value of different house types and tenures, and the needs of different groups.

The proposal as it now stands also maximises self-contained accommodation as required by Policy H2, which states:

To support the aims of Policy H1, where non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses.

- In all parts of the borough the Council will encourage the inclusion of self-contained homes in non-residential development.***
- In the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where development involves additional floorspace of more than 200sqm (GIA), we will require 50% of all additional floorspace to be self-contained housing, subject to the following considerations.***

In the specified areas, the Council will consider whether self-contained housing is required as part of a mix of uses taking into account:

- a. the character of the development, the site and the area;***
- b. site size, and any constraints on developing the site for a mix of uses;***
- c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;***
- d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and***
- e. whether the development is publicly funded or serves a public purpose.***

Where housing is required as part of a mix of uses, we will require self contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

Turning to the revised design, the impact of development is assessed against Policy A1, which states:

Managing the impact of development

The Council will seek to protect the quality of life of occupiers and neighbours.

We will grant permission for development unless this causes unacceptable harm to amenity.

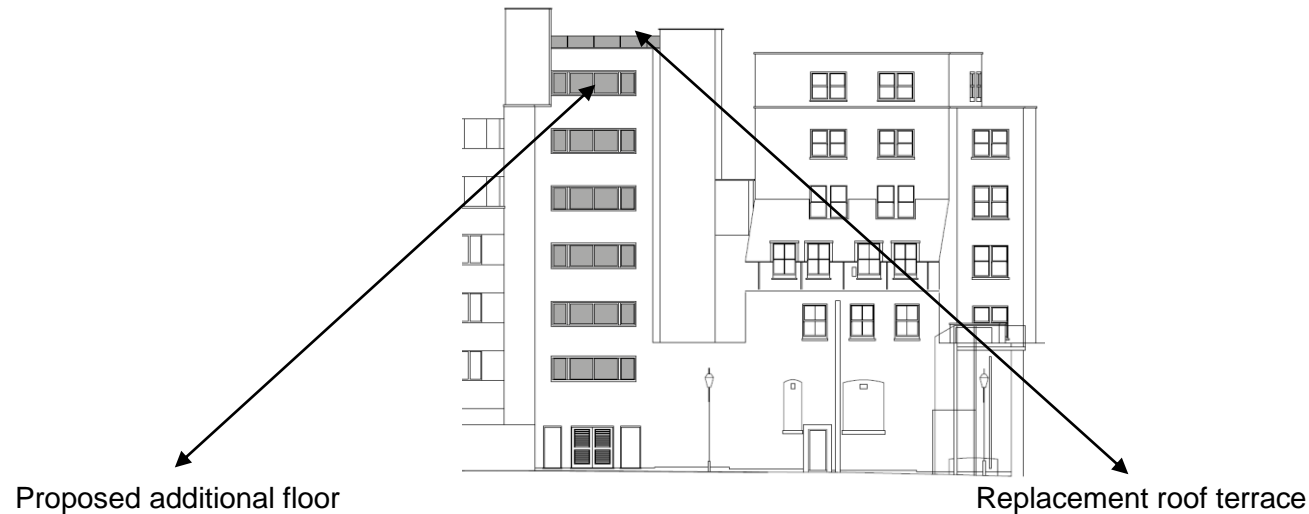
We will:

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;***
- b. 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;***
- c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and***
- d. require mitigation measures where necessary.***

The factors we will consider include:

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

The revised design reflects the extant permission and the increase in height is no greater than the adjacent buildings, as demonstrated in the street scene to Fulwood Place overleaf:



The design incorporates a roof terrace, as does the extant scheme, and uses similar techniques of screening to maintain privacy. By reason of orientation there is no impact on sunlight to either the frontage office use or the higher level residential units of the adjacent 31-33 High Holborn. To the north, across Fulwood Place, the uses are commercial.

Policy D1 Design addresses design. This is largely set by the extant consent and its details, form and materials are repeated in the extra floor. It therefore respects local context and character, as required, and preserves or enhances the historic environment and heritage assets (the Conservation Area). It comprises details and materials that are of high quality and which complement the local character. As demonstrated by the street scene the proposal will integrate with the surrounding streets. Like the extant scheme, it incorporates outdoor amenity space and provides a high standard of accommodation.

The heritage issues are largely dispatched by the extant consent. Policy D2, as regards Conservation Areas, states:

The Council will preserve and, where appropriate, enhance Camden's 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.

Designated heritage assets

Designed heritage assets include conservation areas and listed buildings.

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.

Conservation areas

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council 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.***

The fenestration and its detailing have been redesigned to reflect the balance of the windows below. As noted in the site and surroundings section the property is contemporary and its approved form is repeated. The proposed extra floor sits on the northern part of the building with windows aligning with that below.

The proposal maintains the existing scale of development, acting as a transition from the taller buildings to the north of the site and the lower to the south. As noted above, the design details of the proposal reflect those of the original building with a compatible architectural style used. The architectural integrity of the building would remain intact in relation to the neighbourhood form by it remaining a mid-height building, with consistent architectural details and materials. It is considered that the proposal of an additional flat would not cause any detriment or harm to the architectural, ecological or historic heritage of the locality.

HERITAGE SIGNIFICANCE

The proposed scheme is a development of an extant consent. It is logical and reasonable in its approach to the character of the locality. The character and appearance of the Conservation Area will be affected to a negligible degree by the proposed scheme. The setting of nearby buildings and the character and appearance of the Conservation Area and the setting of others will be preserved and enhanced by the proposed scheme. The visual effect of the extension over the building to the rear of High Holborn will be almost entirely indiscernible, even when a view of the works is actively sought from a position where it is most likely to be seen. Viewed from the upper storeys of surrounding buildings, the replacement of the existing roof structure will be an enhancement over the present situation.

The proposed scheme, for the reasons given above, preserves the special architectural and historic interest as well as the character and appearance of the Bloomsbury Conservation Area, and thus complies with S.66 (1) and S.72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It does not lead to 'substantial' harm or any level of 'less than substantial' harm to any other heritage assets.

The level of 'harm' caused by the proposed scheme

As outlined earlier, the NPP Framework identifies two levels of potential 'harm' that might be caused to a heritage asset by a development: 'substantial harm...or total loss of significance' or 'less than substantial'. Both levels of harm must be caused to a *designated* heritage asset – in this instance, the Conservation Area. The only potential for 'less than substantial' harm would be the loss of something in Conservation Areas that has a direct relationship to what is central to a special architectural and historic interest in the Conservation Area. This does not occur.

The balance of 'harm' versus benefit

In any event, and even if some level of harm was considered to be caused by the proposals, the scheme provides a tangible public benefit in the form of providing additional housing with a sustainable future in a way that does not affect the special architectural and historic interest of the area. The provision of housing is a clear public benefit. This would more than outweigh what very low level of 'harm' – if any – might be asserted is caused by the proposal. The core special architectural and historic interest of the heritage assets remains entirely intact – i.e. preserved – in the proposed scheme.

CONCLUSIONS

We believe there is an opportunity, consistent with Government advice, to provide new accommodation on the upper floors which is in keeping with the form of the adjacent development and the surrounding area. This application positively responds to the context in developing the site in a high quality manner, and to introduce significant benefits to the locality through an appropriate development which perpetuates the form of the locality.

In light of the above and given the compliance with National Policy and the Local Plan we would seek your favourable recommendation and consideration.

APPENDIX A – EXTANT PERMISSION

Mr Brian Madge
bmtld
20 Westmead Road
Sutton
Surrey
SM1 4JT



Regeneration and Planning
Development Management
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Tel 020 7974 4444

planning@camden.gov.uk
www.camden.gov.uk/planning

Application Ref: 2015/6112/P
Please ask for: Kate Phillips
Telephone: 020 7974 2521

11 May 2016

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Full Planning Permission Granted Subject to a Section 106 Legal Agreement

Address:
Alliance House
29-30 High Holborn
London
WC1V 6AZ

Proposal:
Erection of 4 storey rear extension at 2nd, 3rd, 4th and 5th floor levels to create 4 no. self-contained flats (1 no. 2-bed and 3 no. studios)

Drawing Nos: Site Location Plan at 1:1250; Block Plan at 1:500; 514-PL010; 1255-46; 1255-47; 1255-48; 514-PL101; 514-PL202; 514-PL102-A; and 514-PL201-A

The Council has considered your application and decided to grant permission subject to the following condition(s):

Condition(s) and Reason(s):

- 1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

- 3 The noise level in rooms at the development hereby approved shall meet the 'Good' noise standard specified in BS8233:1999 for internal rooms and external amenity areas.

Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP28 of the London Borough of Camden Local Development Framework Development Policies.

- 4 The development hereby approved shall achieve a maximum internal water use of 105 litres/person/day, allowing 5 litres/person/day for external water use. Prior to occupation, evidence demonstrating that this has been achieved shall be submitted to and approved by the Local Planning Authority.

Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CS13 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22 and DP23 of the London Borough of Camden Local Development Framework Development Policies.

- 5 The residential unit hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (2).

Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policy DP6 of the London Borough of Camden Local Development Framework Development Policies.

- 6 The development hereby permitted shall be carried out in accordance with the following approved plans: Site Location Plan at 1:1250; Block Plan at 1:500; 514-PL010; 1255-46; 1255-47; 1255-48; 514-PL101; 514-PL202; 514-PL102-A; 514-PL201-A.

Reason: For the avoidance of doubt and in the interest of proper planning.



INVESTOR IN PEOPLE

Page 1 of 5

Director of Supporting Communities

Page 2 of 5

Director of Supporting Communities

2015/6112/P

Informative(s):

1 Reasons for granting permission

Planning permission has already been granted for the 2nd to 5th floor level extensions at the rear of the building (planning references 2013/7078/P and 2014/4551/P); however this proposal is for residential use rather than offices, and the proposal includes a roof terrace. Insofar as housing is a key priority of the LDF, the creation of additional residential units is welcomed.

The proposal fails to meet the priorities set out in the Dwelling Size Priorities Table (Policy DP5), insofar as it would not provide 40% 2-bed units (high priority). Nevertheless, the creation of 4 no. residential units is welcomed. The proposed 2-bed-4-person (2 storey) unit and the 3 no. 1-bed-1-person units would all meet the Government's current technical housing space standards, and the new dwellings would all provide an acceptable standard of residential accommodation in terms of layout; space and room sizes; storage and utility spaces; daylight and sunlight; privacy and security; and noise.

The application site is located within the Bloomsbury Conservation Area. The previous Appeal Inspector concluded that, by reason of the property's context, the design and siting of the proposed development would accord with the Council's statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area. This application differs by way of the roof terrace. The plans have been amended during the course of the application so that the balustrade would be metal railings and the roof terrace would be set in from the edges of the building. The roof terrace is unlikely to be prominent in views of the building. As such, it is not considered that it would cause harm to the character and appearance of the conservation area.

The application site has a Public Transport Accessibility Level (PTAL) of 6b and is within a Controlled Parking Zone. Policy DP18 expects development to be car free in the Central London Area. This permission is therefore subject to a legal agreement to ensure the dwellings will be car free. Cycle storage will be provided in the private ground floor lobby for each unit. A planning condition can require the submission and approval of details prior to the first occupation of the new dwellings.

It is not considered that the proposal would cause undue harm to the visual and residential amenities of nearby and neighbouring residential properties by way of visual privacy and overlooking, overshadowing or outlook or sunlight/daylight. The roof terrace would be set back from the edge to prevent unacceptable overlooking to neighbouring buildings.

No objections have been raised in relation to the works. The application site's planning history and relevant appeal decisions were taken into account when coming to this decision.

Considerable importance and weight has been attached to the harm and special attention has been paid to the desirability of preserving or enhancing the character

or appearance of the conservation area, under and s.72 of The Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.

The proposed development is in general accordance with Policies CS1, CS5, CS6, CS11, CS13, CS14 and CS18 of the London Borough of Camden Local Development Framework Core Strategy, and Policies DP2, DP5, DP16, DP17, DP18, DP21, DP22, DP23, DP24 and DP26 of the London Borough of Camden Local Development Framework Development Policies. The proposed development also accords with Policies 3.3, 3.4, 3.5, 5.1, 5.2, 6.9, 6.10, 6.13, 7.4, 7.6, 7.8 and 7.15 of the London Plan 2015, consolidated with alterations since 2011; and the provisions of paragraphs 14, 17, 47-66 and 126-141 of the National Planning Policy Framework 2012.

- 2 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts which cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Argyle Street WC1H 8EQ, (tel: 020-7974 6941).
- 3 Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Compliance and Enforcement team [Regulatory Services], Camden Town Hall, Argyle Street, WC1H 8EQ (Tel. No. 020 7974 4444 or on the website <http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-the-environmental-health-team.en> or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.
- 4 You are advised that this proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL as the additional floorspace exceeds 100sqm GIA or one unit of residential accommodation.

The liable amount may be revised on the receipt of the CIL Additional Information Requirement Form or other changes in circumstances. Both CIL's will be collected by Camden after the scheme has started and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement and/or for late payment. We will issue a formal liability notice once the liable party has been established. CIL payments will also be subject to indexation in line with the construction costs index.

- 5 Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.

Director of Supporting Communities

Date: 3 of 5

2015/6112/P

Director of Supporting Communities

Page 4 of 5

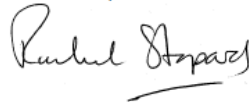
2015/6112/P

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraphs 186 and 187 of the National Planning Policy Framework.

You can find advice about your rights of appeal at:

<http://www.planningportal.gov.uk/planning/appeals/guidance/guidancecontent>

Yours faithfully

A handwritten signature in black ink, appearing to read 'Rachel Stopard', with a horizontal line underneath.

Rachel Stopard
Director of Supporting Communities