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29th March 2021

Dear Sir/Madam,

18 Stukeley Street, London, WC2B 5LR

Planning Application for erection of a two storey extension to create 3 additional residential units

We write on behalf of our client Taracove LTD ‘the Applicant’, in order to submit a full planning application for the creation of three additional residential units with the following description of development:

“Erection of a two storey extension to create 3 additional residential units, balconies on the fifth and sixth floor level and a roof terrace with a green roof”

These proposals follow a similar massing approach to the neighbouring building, 8 Smart’s Place, which was granted consent in March 2020 under reference (2019/1420/P) for a three storey roof extension to create a new dwelling and a roof garden.

Enclosed documentation

The application package comprises the following documents:

- Completed planning application form.
- Completed CIL questionnaire.
- Site Location Plan (showing the site outlined in red).
- Site Plan (showing the site outlined in red).
- Design and Access Statement (produced by Studio Elca Ltd), including proposed visuals.
- Existing and proposed drawings.
- Daylight and Sunlight Report (produced by Point2 Surveyors).
- Energy Statement (produced by Taylor Project Services).
- Structural Feasibility Statement (Produced by Simpson | TWS).
- This planning statement, including the urban greening factor.

For clarification, the planning application fee of £1,386 has been paid by online electronic payment via the Planning Portal website.

The Site

The site is located at the junction of Stukeley Street and Smart's Place and is within the Seven Dials Conservation Area and the Central London Area.

The site comprises a five-storey property with a basement level. In 2013 the building received consent and was implemented to change the use from offices to residential purposes for five flats (Use Class C3)

The site is in close proximity to Holborn, Covent Garden and Tottenham Court Road/ Oxford Street areas, all of which have a diverse range of uses and City centre activities and services. The site has excellent public transport links and has a PTAL rating of 6b.

The building is located within the Seven Dials Conservation Area but is not listed and is not noted as making a positive contribution to the area (Seven Dials Estate Conservation Area Statement 1998).

The site is not within a flood risk area as it falls within Flood Zone 1.

Planning history

We have undertaken a review of the online statutory planning register in order to establish the planning history held by the London Borough of Camden for the site.

Reference Number	Proposal	Date
2013/4021/P	Variation of condition 3 of permission granted 18/02/2013 (ref:2012/6680/P) and subsequently varied (ref:2013/0692) for the change of use to residential; namely, to insert a new external entrance access door for Unit 1 and to amend the internal layout of Unit 1.	Approved 3 rd July 2013
2013/1692/P	Variation of condition 3 (development in accordance with approved plans) of permission granted 18/02/2013 (ref:2012/6680/P) for minor material amendments to the proposed roof extension.	Approved 11 th April 2013
2012/6680/P	Change of use from offices (Class B1a) to self-contained residential flats (Class C3) comprising 2 x 1 bedroom, 2 x 2 bedroom and 1 x 3 bedroom units from basement to fourth floor level, erection of a mansard roof extension with a roof terrace, alterations to fenestration and relocation of main entrance.	Approved 10 th January 2013
2010/6611/P	Replacement of existing timber windows with aluminium framed windows at ground floor and basement level of front and side elevation of office building (Class B1).	Refused 8 th December 2010
2010/4431/P	Erection of roof extension to create fifth floor with side roof terrace, replacement of windows on front and side elevation with new windows to match the existing and replacement of entrance doors to create level access to building (Class B1)	Approved 20 th August 2010
2010/4284/P	Retention of change of use from office (Class B1) to educational centre (Class D1).	Refused and warning of enforcement action

9000072	Change of use from Class B8 warehouse use to B1 office use as shown on O.S Extract.	Approved 26 th January 1990
8601090	Continued use as offices with ancillary basement workshop as shown on site plan.	Approved 17 th June 1986
32705	Continued use as offices with ancillary basement workshop.	Approved 20 th 1981

The building was constructed in the early 1980s as light industrial and warehousing. In 2013 planning application 2012/6680/P was granted consent for a residential scheme comprising five self-contained flats.

Proposals

A summary of the proposals includes the following:

- Erection of a two storey stepped back extension to accommodate three additional residential units.
- Provision of private outdoor amenity space including roof terraces at fifth and sixth floor level and a roof terrace at the top floor level and a 25sqm green roof.
- Extension of the existing lift shaft to serve all floor levels.
- Provision of 8 foldable cycle lockers.

The unit mix and floorspace figures are provided below:

Flat number	Existing GIA Floorspace (sqm)	Proposed GIA Floorspace (sqm)
1	63	63
2	62	62
3	65	65
4	68	68
5	132	68
6	-	67
7	-	81.5
8	-	58.5
Total residential	390	537
Total communal areas	39	64
Total	429	601

The Case for Permission

This section assesses the key planning considerations relating to the proposals, taking into account planning policies as well as material considerations.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan unless material considerations indicate otherwise. Where there is a difference in policy, Section 38(5) requires that the most recently adopted policy takes precedence.

The Statutory Development Plan for the London Borough of Camden comprises the following documents:

- The London Plan: The Spatial Development Strategy for Greater London (Published March 2021),
- Camden Local Plan (Adopted 3rd July 2017).

LB Camden is under a legal duty to have regard to all material considerations. This includes the Government's National Planning Policy Framework (NPPF) (2019), National Planning Practice Guidance (NPPG) and the requirements of relevant Circulars.

Supplementary Planning Guidance and Documents (SPG and SPD) produced by LB Camden and the GLA are also relevant material considerations. Of relevance is the Seven Dials Estate Conservation Area Statement adopted in 1998.

Planning assessment

Principle of residential use

London Plan Policy H2 states that boroughs should proactively support new homes on small sites and that they should make a greater contribution to new housing supply across the city. The supporting text advises that intensification of existing buildings including upward extensions will be supported in areas with a high PTAL rating.

Local Plan Policy H1 aims 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 2016/18 to 2030/31, including 11,130 additional self-contained homes.

The London Plan and Camden Local Plan are therefore supportive of development which boosts housing supply. The upward extension to provide three additional residential units is supported by policy and will contribute to the increasing housing demand in the borough in a highly accessible location.



Residential mix

London Plan Policy H10 seeks to ensure a mix of housing sizes and in determining the appropriate mix of unit sizes, regard should be made to evidence of local needs.

This is echoed in Local Plan Policy H7 which aims to secure a range of different sized homes. The supporting text refers to the Camden Strategic Housing Market Assessment (SHMA), which indicates that the greatest requirement in the market sector is likely to be for two and three bedroom homes, followed by one bedroom homes.

The proposals increase the number of residential units from five to eight and provide an improved mix with greater versatility of unit types. The three proposed units are 2 two-bedroom units and 1 one-bedroom unit, and this along with the five existing units will contribute to the housing mix in London and deliver a range of housing choices.

The proposed addition of three additional residential units within the building meets the local housing mix and is in accordance with London Plan H12 and Camden Local Plan H7.

Quality of residential accommodation

London Plan Policy D4 advises that residential developments should be of high quality design and the policy sets out the minimum space standards, private outdoor space minimum standards and the requirement to maximise dual aspect dwellings. London Plan Policy D5 seeks to achieve the highest standards of accessible and inclusive design.

This is reiterated in Local Plan Policy H6. The policy also seeks to secure high quality accessible homes in all developments and encourages design of all housing to provide functional, adaptable and accessible spaces.

The proposed residential units have been designed to deliver a high-quality residential environment for future residents. Each of the three residential units proposes spacious living areas and provides adequate light, outlook and ventilation. Balconies are proposed at the fifth and sixth floor levels to provide external amenity space and a roof terrace is accessible to the two uppermost units.

Accessibility throughout the building will be improved with the existing lift extended to provide access to all new units and all WCs and bathrooms will be adaptable for grab rails.

Further details of the residential quality of the flats is provided in the Design and Access Statement.

Design and heritage conservation

As the site is within the Seven Dials Conservation Area and near a number of Grade II listed buildings the proposals have been carefully designed to preserve and enhance their setting.



In the Seven Dials Conservation Area Statement (SDCAS) the site falls within sub-area three but is not considered to be a building that makes a positive contribution. SD1 of the SDCAS guidelines notes that new development should be seen as an opportunity to enhance the conservation area and should respect the built form and historic context of the area, local views as well as existing design features. SD25 of the SDCAS relates to roof extensions and all external works should be carried out in materials as close as possible in colour, texture and type to that of the original building or are common in the area.

London Plan Policy HC1 advises that development proposals affecting heritage assets and their settings, should conserve their significance, by being sympathetic to the assets significance and appreciation within their surroundings.

Local Plan Policy D1 seeks to ensure high quality design in development and requires development to respect the local context and character and preserve and enhance the historic environment and heritage assets. Local Plan Policy D2 requires proposals within conservation areas preserve and where possible enhance the character or appearance of a conservation area.

The proposed two storey extension is in keeping with the surrounding building heights and will mirror the building directly next to the site at 8 Smart's Place which was granted consent in March 2020 (reference: 2019/1420/P) for a three storey extension.

The two storey extension in these proposals will be setback and this will reduce its height, bulk and massing and respect the local context as well as the amenity of neighbouring occupiers.

The proposals provide materials which are similar in appearance to the existing structure to the existing floors below. The new massing at the top floors will be stepped back at both elevations and finished with Ketley Staffordshire Blue Bricks. The windows on both facades will be curved shaped, maintaining the existing symmetrical fenestration arrangement.

More details can be found in the submitted Design and Access Statement with the proposals having taken into account the surrounding buildings and their height. The two storey extension has respected the surrounding area and Seven Dials Conservation Area and is in accordance with the London Plan, Camden Local Plan and the Seven Dials Conservation Area Statement.

Neighbouring amenity

London Plan D6 advises that housing development should be of high quality with functional layouts which are fit for purpose, provide sufficient daylight and sunlight and maximise amenity space.

Local Plan Policy A1 seeks to protect the quality of life for occupiers and neighbours with the policy setting out factors that the Council will consider including visual privacy outlook, and sunlight, daylight and shadowing. Additionally, Camden Planning Guidance (Amenity) notes that proposals should ensure a high standard of amenity and provides guidance relating to overlooking, privacy and outlook.



A Daylight and Sunlight Report has been prepared by Point 2 Surveyors which assesses the impact of the proposed development on neighbouring properties.

For daylight, the Vertical Sky Component (VSC) results demonstrate that 38 out of 45 windows (84%) will meet the strict application of the BRE Guidelines. In terms of the No-Sky Line (NSL), the results demonstrate that 13 out of 14 rooms (93%) will meet the BRE Guidelines. The single instance of alteration that does not meet the strict application of the BRE Guidelines records a change that falls within 1.3% beyond the BRE's permissible 20% from former change.

For sunlight (APSH), the results demonstrate very good levels of light, demonstrating full BRE compliance (100%).

In summary, recognising the urban context of the site, the Proposed Development will relate very well to neighbouring residential properties, meeting the objectives of BRE Guidance, the London Plan, Local Plan Policy A1 and the Camden Planning Guidance (Amenity).

Transport and parking

London Plan Policy T6 seeks to promote sustainable transport use. The plan identifies a number of ways in which this is to be achieved, including reducing the need to travel (especially by car), improving the capacity and accessibility to public transport and other sustainable options (i.e. walking, cycling) and promoting development that generates a high level of trips in locations with high levels of public transport. This follows Local Plan Policy T2 which requires new development in the borough to be car-free.

Local Plan Policy T1 requires cycle parking to be provided in line with the standards set out in the London Plan under London Plan Policy T5. Table 10.2 of the London Plan shows the cycle parking minimum standards and specifies that C3 dwellings should provide 1 space per studio and 1 person 1 bedroom unit, 1.5 spaces per 2 person 1 bedroom dwelling and 2 spaces per all other dwellings.

Camden's Planning Guidance Transport states cycle parking should be provided off-street, within the boundary of the site and close to the site entrance. Cycle parking needs to be accessible (in that everyone who uses a cycle can easily store and remove it from the cycle parking) and secure (in that both wheels and the frame can easily be locked to the stand).

The proposed development would continue to be car free.

Due to the site's space constraints which is an existing building of independent residential units with no opportunity to carve out new space at ground floor, and a lack of external space on the narrow street, an innovative solution of eight foldable bicycle lockers will be provided and will meet London Plan and Camden requirements by providing secure cycle parking which is sheltered. This is an improvement to the existing position which provides no cycle parking spaces for the existing flats. Folding bicycles can be provided with the flats to ensure no one is disadvantaged by the perceived cost.



Additionally, it is noted that due to the site's PTAL rating of 6b, future residents would have adequate access to a range of public and active transport options.

For these reasons, it is considered that these amendments would be acceptable and in accordance with policies T5 and T6 of the London Plan and Local Plan policies T1 and T2.

Energy and sustainability

The proposed development has aimed to ensure it achieves a high standard of energy efficient and sustainable design in line with the relevant policies of the London Plan and Camden Local Plan.

London Plan policies SI2 and SI3 relate to major development proposals which the proposed submission does not fall under. Local Plan Policy CC1 seeks to ensure proposals minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. This is reiterated in Policy CC2 in that the Council will promote sustainable design and construction measures.

The supporting energy statement has provided details on where the proposals provide improvements to the energy performance of the building. This includes high performance openable windows that provide good insulation and natural ventilation and a living roof providing surface water management for the attenuation of storm water. Additionally, Off-site fabrication will allow for quick assembly and reduce material carbon emissions.

The proposals have also enhanced biodiversity on site through a 25sqm green roof and roof planters installed to the balconies and roof terrace. The Urban Greening Factor score comes to 0.27, which although below the 0.4 score recommended in London Plan Policy G5, the policy does advise that this needs to be tailored to local circumstances. As such the 0.27 Urban Greening Factor score is considered acceptable due to the site's size and is an improvement from the existing position.

Overall the proposals provide an improvement in efficiency and energy saving to provide a sustainable development that complies with London Plan and Local Plan policies.

Noise

The proposed development does not include any plant at roof level and proposes electrical heating and natural ventilation and therefore will not cause noise disruption to neighbouring buildings. As there is no impact on noise, the proposals are in accordance with the relevant policies within London Plan policies D13 and D14 and Camden Local Plan Policy A4.



Waste management

London Plan Policy SI7 expects proposals to provide adequate, flexible and easily accessible storage space and collection systems that support the separate collection of recyclables and food.

Local Plan Policy CC5 seeks to ensure to make Camden a low waste borough and requires developments to include facilities for the storage and collection of waste and recycling.

Each unit will be fitted with separate waste and recycling containers within the kitchens. The locations of each storage unit have been indicated in the kitchen of each unit.

Summary

As detailed in the previous sections the proposals would deliver a number of planning benefits and present an opportunity to provide three additional residential units of high quality design. They have been designed to reflect the very recent planning permission 2019/1420/P at 8 Smart's Place and therefore respect the Seven Dials Conservation Area and relevant planning policies in the London Plan and Local Plan.

We therefore consider that this modest increase in housing represents the best use of land, in accordance with sustainable principles, whilst having reduced carbon impacts compared to traditional building techniques and meeting other policies of the Development Plan.

We look forward to confirmation of validation of the planning application shortly. Should you have any queries, please contact Max Cartwright (07892 704351).

Yours faithfully,

Jones Lang LaSalle Limited