



M. Allison

29 GREAT JAMES STREET

Planning Statement



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WSP




WSP House
70 Chancery Lane
London
WC2A 1AF

Phone: +44 20 7314 5000

Fax: +44 20 7314 5111

WSP.com

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Prepared by	Lucy Morris			
Signature				
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INTRODUCTION

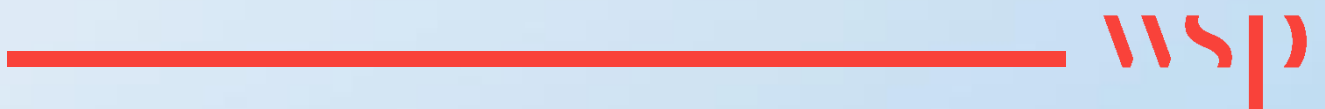


1 INTRODUCTION

- 1.1.1. This Planning Statement has been prepared by WSP on behalf of M. Allison (“the applicant”) in respect of full planning permission and listed building consent at 29 Great James Street, London, WC1N 3EY (“the site”).
- 1.1.2. The proposal seeks permission for the:
“Change of use from Class E (offices) to Class C3 (residential) including internal and external alterations and a rear extension.”
- 1.1.3. In support of this application and in accordance with the London Borough of Camden (“LB Camden”) validation requirements, we submit the following reports:
- Complete set of application drawings, prepared by Quinn Architects;
 - Design and Access Statement, prepared by Quinn Architects;
 - Daylight and Sunlight Report, prepared by Delva Patman Redler;
 - Heritage Appraisal, prepared by The Heritage Practice;
 - Structural Method Statement and Basement Impact Assessment, prepared by Structural Design Studio;
 - Energy and Sustainability Statement, prepared by JAW Sustainability;
 - Marketing letter, prepared by Farebrothers;
 - Construction Management Plan, prepared by Paul Mew Associates; and
 - CIL forms, prepared by WSP.
- 1.1.4. This Planning Statement includes the following sections:
- Section 2 considers the site and its surrounding context;
 - Section 3 describes the proposed works in detail;
 - Section 4 sets out the policy context;
 - Section 5 assesses the key planning considerations; and
 - Section 6 summarises the proposals.

2

SITE AND SURROUNDING CONTEXT



2 SITE AND SURROUNDING CONTEXT

2.1 SITE DESCRIPTION

- 2.1.1. The site comprises a terraced, four storey Grade II* building with a basement level which dates back to circa 1700 . The building lies within the Bloomsbury Conservation Area in the London Borough of Camden and forms part of a wider group statutory listing.
- 2.1.2. The property backs on to a three storey industrial-style block which is accessed via Emerald Street. The back garden comprises a number of single storey outbuildings. A number of photovoltaic panels have been installed on the roof of the building.
- 2.1.3. Historically, properties within this area have been used as offices for law and architectural firms, however, a number have been converted back to their original uses as residential dwellings (see planning history section below). The previous occupiers, John Simpson Architects, vacated the premises in March 2020 and the property now stands empty.
- 2.1.4. The property lies within a viewing corridor and an Archaeological Priority Area. The building is in a highly sustainable location, with a PTAL rating of 6b (on a scale of 1a to 6b).
- 2.1.5. The site lies within Flood Zone 1 which indicates a low probability of flooding from river and sea sources.

2.2 PLANNING HISTORY

- 2.2.1. The table below sets out the pertinent planning applications along Great James Street.

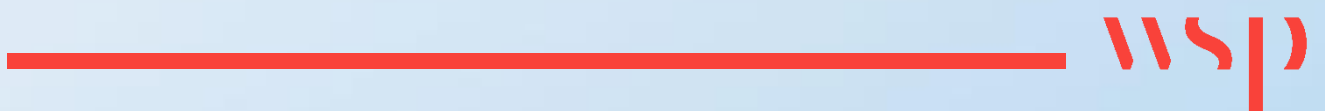
Address	LPA Ref.	Description	Decision
1-3 Great James Street & 54 Theobalds Road	2021/0128/P	Change of use (conversion of the existing basement unit from storage/retail use (Class A1) to an office (Class B1 use)), change of use of part of the first floor from an office (Class B1) to a 2 bedroom flat (Class C3), addition of platform lift, access, metal gate and replacement of metal stairs, new kiosk and associated works.	Pending
7 Great James Street	2020/5940/P	Change of use of the building from office (Class E) to residential (Class C3) to form a self-contained dwelling and erection of single storey rear extension with roof terrace above, plus associated alterations.	Pending
8 Great James Street	2020/5943/P	Change of use of the building from office (Class E) to residential (Class C3) to form a self-contained dwelling and extension of accommodation to fourth floor level, plus associated roof dormers at front and rear and external alterations.	Pending
11-12 Great James Street	2008/1141/P	Change of use and works of conversion from office use (Class B1) to residential use (Class C3) to provide two single family dwelling houses, including new part single, part two storey rear extension and balcony at first floor level.	Granted 31 March 2009

14 Great James Street	2013/3114/P	Change of use of existing office building (Class B1a) to single family dwelling (Class C3), to include the erection of a two-storey rear extension at lower ground and ground floor level with terraces at ground and first floor level following demolition of existing two storey extension, alterations to rear facade, and erection of dormer and terrace at rear roof level.	Granted 10 January 2014
	2015/3046/P	Erection of a two-storey rear extension at lower ground and ground floor level with a terrace and meeting room at first floor level following demolition of the existing two storey extension, alterations to rear facade including extension at 1st to 3rd floor level, associated internal restoration and erection of dormer and terrace at rear roof level, and installation of 3x rooflights.	Granted 14 August 2015
14-15 Great James Street	2019/3871/P	Excavation of basement extension and erection of part single-storey, part four-storey rear extension above (following demolition of existing); Formation of roof terraces at first and main roof levels; Erection of dormer roof extension and installation of 2 roof lights to rear roof slope all to no. 15; Installation of glazed balustrade to rear parapet across Nos 14 and 15 (Use Class B1).	Granted subject to a s106 11 June 2020
30 Great James Street	2014/1571/P	Change of use from office (B1a) to single family dwellinghouse (C3), erection of rear extension following demolition of existing extension and installation of rear glass balustrade at 1st floor level.	Granted 10 July 2014
32 Great James Street	2012/3602/P	Erection of two storey rear infill extension and associated alterations to internal layout, following the demolition of existing part one/part two storey rear extension to offices (Class B1a).	Granted 4 September 2012
34 Great James Street	2013/4419/P	Change of use from offices (Class B1) at basement and ground floor level and 3x1 bed flats (Class C3) at first to third floor level, to a single dwellinghouse (Class C3), including replacement ground floor rear extension with first floor external terrace and associated works.	Granted 26 September 2013
	2019/3493/P	Erection of single storey ground floor rear extension, reinstatement of sash window at first floor, demolition of existing structures at rear courtyard, replacement of windows with single glazed units and associated alterations.	Granted 16 October 2019
37 Great James Street	2021/0257/P	Change of use of the building from office (Class E) to residential (Class C3) to form a self-contained dwelling, plus external alterations to main building and rear 'cottage building'.	Pending



3

PROPOSALS



3 PROPOSALS

- 3.1.1. The scheme proposes the change of use of the building from offices (Class E), back to its original use as a single residential dwelling (Class C3).

3.2 PROPOSED WORKS TO THE FRONT

- 3.2.1. The works which are to be undertaken towards the front of the site are limited in nature and will remove the modern additions to it, thereby enhancing the conservation area.
- 3.2.2. The non-original sashes will be replaced to replicate the original detailing. The stairs at the front of the building will be replaced with black metal stairs which will meet current regulations. The existing gate will be welded shut and a new gate formed from the existing railing, in line with the other properties along Great James Street.

3.3 PROPOSED INTERNAL WORKS

- 3.3.1. The internal works focus on the restoration of the existing building in order to create a high quality space for residential living. The existing rear vaults at basement level will be lowered to provide better head heights incorporating sufficient waterproofing and insulation.
- 3.3.2. The remaining internal works proposed are set out in greater detail in the accompanying Design and Access Statement, prepared by Quinn Architects.
- 3.3.3. These works are required to bring the property back into residential use, which is of significant benefit to the conservation area and the listed building as a whole.

3.4 PROPOSED WORKS TO THE REAR

- 3.4.1. To the rear of the property, an 'L' shaped extension is proposed, connecting to the closet wing. This will include a kitchen at ground floor with an open courtyard, and a small study at first floor. The roof terrace will be set below the internal first floor level of the main house to reduce the impact on the neighbouring properties.
- 3.4.2. The small study at first floor has been brought away from the boundary to the No.28 and will sit lower based on the internal floor heights being sunken. This will mean that the roof height of the first floor study will be approximately level with the existing trellis at No.30.
- 3.4.3. The extension will be of a clean, modern design so as to not compete or detract from the main building of No. 29. The roof will be planted with flat sedum and will incorporate walkable rooflights.

3.5 CONSULTATION

- 3.5.1. In preparation for the submission of this application, the applicants have engaged with the occupiers of No.28 Great James Street have met with them on a number of occasions as follows:
- 16 June 2021 – Initial meeting to discuss proposals for the rear extension;
 - 6 October 2021 – Further meeting to discuss proposals;
 - 13 October 2021 – Advising that borehole works were to commence; and
 - 28 October 2021 – Further meeting to discuss proposals in greater detail.
- 3.5.2. This was to ensure that the occupiers of No.28 are aware of the proposals and it can be demonstrated how the scheme has been adapted to ensure impacts are kept to a minimum.

4

PLANNING POLICY



4 PLANNING POLICY

- 4.1.1. The development proposed as part of this application will be assessed against the National Planning Policy Framework (NPPF) (July 2021), policies contained within LB Camden's Local Plan (July 2017) and the London Plan (March 2021).
- 4.1.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out that, provided that policies in the development plan are relevant, decisions on planning applications must be taken in accordance with the development plan, unless there are material considerations that indicate otherwise.
- 4.1.3. The development plan comprises the following documents:
 - Camden Local Plan (July 2017).
- 4.1.4. The following supporting documents represent material considerations in determining the planning application:
 - National Planning Policy Framework (NPPF) (July 2021);
 - New London Plan (March 2021);
 - Amenity Camden Planning Guidance (January 2021);
 - Design Camden Planning Guidance (January 2021);
 - Developer Contributions Camden Planning Guidance (March 2019); and
 - Housing Camden Planning Guidance (January 2021).

4.2 NATIONAL POLICY CONTEXT

- 4.2.1. The latest version of the NPPF was published in July 2021. It emphasises the importance of sustainable development at sets out the core planning principles guided by the Government's planning policies.
- 4.2.2. Paragraph 11 states that decisions should apply a presumption in favour of sustainable development and development proposals which accord with an up-to-date development plan should be approved without delay.
- 4.2.3. This is repeated at paragraph 47 where it states that decisions on applications should be made as quickly as possible and within statutory timescales.
- 4.2.4. Paragraph 60 sets out the Government's objective of significantly boosting the supply housing, with an emphasis on brownfield land (paragraph 119).
- 4.2.5. At paragraph 130, the NPPF sets out the requirement for good design, including the functioning of the development, being sympathetic to the local character and history, maintaining a strong sense of place and optimising the potential of a site.
- 4.2.6. As part of planning applications, applicants are required to describe the significance of heritage assets affected. The level of details should be proportionate to the asset's importance (paragraph 194).

4.3 LONDON POLICY CONTEXT

- 4.3.1. The New London Plan was adopted in March 2021 and is the spatial development strategy for Greater London. It sets out the framework for how London will develop over the next 20 to 25 years

and the Mayor's vision for good growth. The policies relevant to the proposals are summarised below.

- 4.3.2. Policy D4 (Delivery good design) requires Design and Access Statements to be submitted with proposals to demonstrate that the proposal meets the design requirements of the London Plan.
- 4.3.3. Policy D5 (Inclusive design) requires development proposal to achieve the highest standards of accessible and inclusive design.
- 4.3.4. Policy D6 (Housing quality and standards) states that housing development should be of high quality design and provide private internal and external spaces which are fit for purpose and meet the needs of Londoners.
- 4.3.5. Policy D10 (Basement development) states that Boroughs should establish policies in their Development Plans to address the negative impacts of large-scale basement development beneath existing buildings, where this is identified as an issue locally.
- 4.3.6. Policy H2 (Small sites) states that Borough should pro-actively support well-designed new homes on small sites.
- 4.3.7. Policy E2 (Providing suitable business space) states that proposals that involve the loss of existing Use Class B (some of which now falls under Class E) business space in areas identified in a local policy document, where there is a shortage of lower-cost space or workspace of a particular type, use or size, should demonstrate that there is no reasonable prospect of the site being used for business purposes, or ensure that an equivalent amount of B Use Class business space is re-provided in the proposal.
- 4.3.8. Policy HC1 (Heritage conservation and growth) requires development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

4.4 LOCAL POLICY CONTEXT

ADOPTED CAMDEN LOCAL PLAN

- 4.4.1. The Camden Local Plan was adopted in July 2017 and is the key strategic document in Camden's development plan. It sets out the vision for shaping the future of the Borough and contains policies for guiding planning decisions. The relevant policies are set out below.
- 4.4.2. Policy H1 (Maximising housing supply) sets out the Council's aim to secure a sufficient supply of homes to meet the needs of existing and future households to maximise the supply of housing and exceed a target of 16,800 additional homes from 2016/17 to 2030/31.
- 4.4.3. Policy D1 (Design) ensures high quality design in all development within the Borough.
- 4.4.4. Policy D2 (Heritage) states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings.
- 4.4.5. Policy A1 (Managing the impact of developments) states that the Council will seek to ensure the amenity of occupiers and neighbours, including sunlight, daylight and overshadowing.
- 4.4.6. Policy A5 (Basements) states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to neighbouring properties;

the structural, ground, or water conditions of the area; the character and amenity of the area; the architectural character of the building; and the significance of heritage assets.

- 4.4.7. Policy CC1 requires all development to reduce the effects of climate change and encourages developments to meet the highest feasible environmental standards.

ADOPTED SITE ALLOCATIONS PLAN

- 4.4.8. The Site Allocations Plan was adopted in September 2013 and sets out the Council's key objectives and guidance for development of land and buildings on significant sites which are likely to be subject to development proposals. There are no relevant policies within this Plan.

5

PLANNING CONSIDERATIONS



5 PLANNING CONSIDERATIONS

5.1 PRINCIPLE OF CHANGE OF USE

- 5.1.1. The building was originally constructed as a single residential dwelling back in the 1700s and therefore its change of use from Class E (offices) to a residential dwelling would see the building back in its intended use.
- 5.1.2. Recent applications along Great James Street show that similar buildings have been granted planning permission for reversion of offices back to residential use including Nos. 11-12, 14, 30 and 34.
- 5.1.3. These applications have been also supported by the Bloomsbury Conservation Area Group.
- 5.1.4. The Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011) notes that:
- “Although once primarily residential, the area now has a mixture of uses. The main and secondary thoroughfares (John Street, Doughty Street, Bedford Row, Rugby Street and Great James Street) are dominated by office uses but retain some residential uses (in particular in Millman Street). Throughout the sub area, there is an increasing trend to return townhouses to their original use as single family dwellings.”*
- 5.1.5. Policy E2 (Employment premises and sites) states that the Council will resist the development of business premises and sites for ‘non-business uses’ unless it can be demonstrated that the building is no longer suitable for its existing business use and that there is no demand for business use.
- 5.1.6. As demonstrated through the marketing letter, prepared by Farebrothers, and submitted in support of this application, there is little appetite from the market for buildings such as 29 Great James Street for business uses.
- 5.1.7. No. 29 Great James Street was built as a single residential dwelling in the early 1700s, meaning that its layout is not conducive to modern business uses. Its protected status as a Grade II* listed building means that there is very limited scope to amend the existing layout.
- 5.1.8. Further, the age of the building means that it does not offer the internal specifications which are up to the standard expected by the market which can be found in purpose built accommodation. Heating and cooling, reliable power, modern lighting, sufficient WC provision and modern kitchen facilities are basic requirements that are expected by businesses.
- 5.1.9. Modern businesses also look for premises with outside space, cycle storage and showers and changing facilities in order to remain attractive to employees. Without these facilities, the ability to let the premises for business uses at a reasonable rate is extremely low.
- 5.1.10. Due to the historic nature of the building, it is also not possible to make the premises fully accessible for disabled persons and many businesses do not want to lease employment space where they are unable to provide workspace for those with disabilities.
- 5.1.11. The Coronavirus Pandemic has seen a significant increase in available space to let over the past 18 months or so as a result of more people working from home, meaning that there is a surplus of employment floorspace. The trend back to full-time office working is still a way off and tenants are seeking premises of a high quality. As such, there is little scope of the premises being let out for

business uses and the change of use of 29 Great James Street from office to residential is considered to be appropriate and justified in this location.

- 5.1.12. The returning of the property to residential use will also contribute one dwelling to the Council's housing supply on a small site which is a positive benefit which weighs in favour of the application.

5.2 PRINCIPLE OF RESIDENTIAL EXTENSION

- 5.2.1. The proposals include an extension at ground floor level with a setback garden room at first floor level and a terrace.
- 5.2.2. The majority of the dwellings along both sides of Great James Street have had extensions built to the rear (see Figure 5-1 below).

Figure 5-1: Aerial view of Great James Street.



- 5.2.3. Nos. 11-12, 14-15, 30, 32 and 34 have all been granted consent for extensions to the rear of the properties in recent years.

- 5.2.4. At 34 Great James Street, permission was granted on 26 September 2013 for:

“Change of use from offices (Class B1) at basement and ground floor level and 3x1 bed flats (Class C3) at first to third floor level, to a single dwellinghouse (Class C3), including

replacement ground floor rear extension with first floor external terrace and associated works.” (LPA Ref. 2013/4419/P)

- 5.2.5. In the Officer Report, it was noted that the proportions of the garden room at first floor were restricted to keep within the confines of the corner, with only the projected edge of the garden room roof visible from No. 35 Great James Street. It was noted that views of the garden room from No. 33 were limited and it was considered that the acute angle of views from the garden room would not lead to any negative impact on amenity and the proposal was satisfactory.
- 5.2.6. The report goes on to say that the rear boundary with houses in Great James Street is in excess of three storeys height, which restricts outlook and views of the occupiers. The proposed garden room was of lower height and its location was considered not to have any impact on resident occupiers' amenity in terms of loss of day/sunlight or outlook and was acceptable.

5.3 HERITAGE AND DESIGN

- 5.3.1. No. 29 forms part of a group listing which comprises numbers 26-37 and 39-40 Great James Street. The property is Grade II* which is the next highest level of protection after Grade I. The building is also located within the Bloomsbury Conservation Area.
- 5.3.2. Policy D2 of the Camden Local Plan states that the Council will not permit development which would result in less than substantial harm to the significance of a designated heritage asset, unless it can be demonstrated that this would achieve substantial public benefits that would outweigh the harm caused.
- 5.3.3. In conservation areas, development will be required to preserve or enhance the character or appearance of the area.
- 5.3.4. For listed buildings, the Council will resist proposals for a change of use or alterations and extensions where this would cause harm to the special architectural and historic interest of the building.
- 5.3.5. The Heritage Appraisal, prepared by The Heritage Practice, and submitted in support of this application, demonstrates that the return of the building from office use to residential is a significant enhancement and is in keeping with the character of the local area.
- 5.3.6. It provides a detailed assessment of the significance of the building and its associated contribution in terms of architectural and historic interest.
- 5.3.7. The report notes that the proposals include a comprehensive refurbishment of the building, alongside a modest rear extension which will create a modern living space which preserves the character and quality of the building. The proposals preserve the front façade of the building which is the area of highest significance and will make a positive contribution to the streetscene, preserving and enhancing the character of the listed building and the conservation area.

CHANGE OF USE

- 5.3.8. The Heritage Assessment states that it is widely acknowledged that the best use for historic buildings is the use which they were designed and constructed for. Therefore, the reversion of 29 Great James Street to its original use as a single residential will contribute to the reinstatement of the street's domestic and residential character.

EXTERNAL ALTERATIONS

- 5.3.9. The extension at the rear will replace the existing structures with a 'L' shaped single storey extension and a garden room at first floor level setback into the southwest corner of the extension. The design of the extension will be contemporary with metal frames windows and doors and a green roof at first floor.
- 5.3.10. The extension is low in height and will sit subservient to the main building. The rear of the property is well contained by the western boundary wall and by the walls and trellis along the boundaries to Nos. 28 and 30. This means that the extension will sit respectfully within its surrounding context and cannot be seen from any public vantage place. As demonstrated within the accompanying heritage statement, the extension is considered acceptable in heritage terms.
- 5.3.11. To the front of the building, only minor alterations are proposed which will respond positively to the local historic character and enhance its position within the conservation area. The replacement of the windows will be a significant enhancement to the building.

INTERNAL ALTERATIONS

- 5.3.12. The changes to the layout and basement are considered to be acceptable in the context of the positive benefits of the property's change of use back to residential as the basement vaults are an area of lower significance and the changes proposed will still retain the overall sense of the historic nature of the building. Further, the extensive repair and refurbishment works will benefit the building in retaining its historical and architectural significance.
- 5.3.13. In support of this application, a Structural Method Statement and Basement Impact Assessment, prepared by Structural Design Studio, has been submitted. This report shows that the works can be carried out without any significant adverse effect on the property, neighbouring properties, groundwater, surface water or on the stability of the adjoining ground. As such, the proposals are in line with policy and are acceptable in planning terms.

SUMMARY

- 5.3.14. The Appraisal shows that the proposals will have no harmful impact upon the historic or architectural significance of the building and its conversion back to residential use will be an enhancement.
- 5.3.15. The external works are modest in scale and impact and in many cases will enhance the listed building. The rear of the building is of lower significance compared to the front façade and the extension will be of high quality, ensuring the preservation of the conservation area.
- 5.3.16. Internally, the proposed layout of rooms is in the context of the existing plan of the building. Any new partitions are limited to areas of lower significance.
- 5.3.17. As such, the proposals are in accordance with the NPPF, the London Plan and the Camden Local Plan.

5.4 RESIDENTIAL AMENITY

- 5.4.1. A Daylight and Sunlight Report, prepared by Delva Patman Redler, has been submitted in support of this application to demonstrate that the proposals will not have any detrimental impact on the privacy or amenity of neighbouring properties.

- 5.4.2. The report shows that all neighbouring habitable windows and rooms will fully comply with the BRE recommendations. Further, the overshadowing assessment shows that all neighbouring amenity areas will comply with the BRE recommendations.
- 5.4.3. Therefore, the proposals are in compliance with the NPPF, Policy A1 of the Camden Local Plan and the London Plan.

5.5 SUSTAINABILITY

- 5.5.1. An Energy and Sustainability Statement, prepared by JAW Sustainability, has been submitted in support of this application.
- 5.5.2. As set out within the report, the design of the scheme has had specific regards to sustainability. This includes a glazing strategy design which takes into consideration the orientation and size of windows to maximise daylight whilst controlling excessive solar gains. The building fabric will be updated and the building fabric of the extension will be in line with 'Be Lean' passive design measures. Water fittings will meet the target water consumption of 110 litres per person per day.
- 5.5.3. Construction site waste will be managed so as to reduce the amount of waste produced, with at least 85% of waste being recycled using an external waste contractor. Light fittings will be of low energy consumption.
- 5.5.4. The proposals will comply with Policy CC1 of the Local Plan and are acceptable in planning terms.

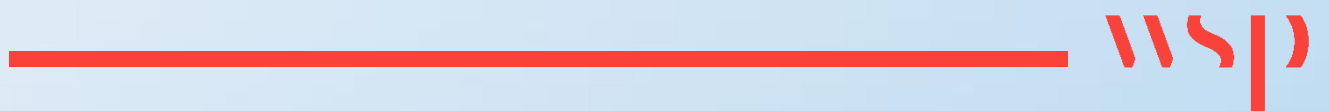
5.6 ARCHAEOLOGY

The proposed development lies within an Archaeological Priority Area, however, it is classified as "Tier 2" which is less sensitive to development. This area is associated with the expansion of London's 'suburbs' in the 17th and 18th centuries. The site was on the edge of the city in 1799 and prior to that it was a field, between the centres of medieval and Roman settlement at Westminster and the City.

- 5.6.1. The existing basement is likely have truncated or removed any earlier archaeological remains. The proposal to lower the basement is localised and small in scale, and it is not in an area where significant archaeological remains pre-dating the existing building are likely to be present. Therefore, the proposals are in accordable with national, regional and local planning policy.

6

CONCLUSION



6 CONCLUSION

- 6.1.1. The proposed scheme will bring back a Grade II* listed property into its original use and will create a new dwelling which will contribute to the Council's housing supply. Both of these are considerable benefits which weigh in favour of the application.
- 6.1.2. The building is not fit for employment uses by virtue of its layout and quality not being conducive to modern business operations. There is little demand for this type of office stock and there is no reasonable prospect of it being let. Therefore, the loss of this office space is considered acceptable.
- 6.1.3. The proposed alterations and extension to the building are of high quality and have been designed carefully to respect and enhance the historic and architectural contribution of the building to the Bloomsbury Conservation Area.
- 6.1.4. The extension to the rear will replace the current unsympathetic structures with a contemporary, sensitively designed single storey structure with a garden room and green roof at first floor level. It will sit subservient to the main building and the high rear wall. There will be no detrimental impact on neighbouring amenity as a result of this extension.
- 6.1.5. The scheme has been designed with sustainability in mind and will incorporate a number of features including glazing and updating the building fabric, to increase the building's energy efficiency.
- 6.1.6. The proposals provide clear benefits and are in accordance with Camden's development plan, the London Plan and national policy. Therefore, as set out under paragraph 47 of the NPPF, the application should be approved without delay.



WSP House
70 Chancery Lane
London
WC2A 1AF

wsp.com

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