

Planning Statement

18 Stukeley Street, London, WC2B 5LR

On behalf of Taracove LTD

November 2021



Planning Statement

Introduction	3
The Site and Surroundings	4
Planning History	7
The Proposed Development	9
Pre-Application Discussions	11
Relevant Planning Policies	14
The Case for Planning Permission	22
Scheme Benefits	28
Appendix 1- Pre-application meeting feedback	29

1. Introduction

This Planning Statement has been prepared by the Jones Lang LaSalle ('JLL') on behalf of Taracove Ltd ('the applicant') to support an application for the development of 18 Stukeley Street, London, WC2B 5LR (the "Site").

The site is located within the administrative boundary of the London Borough of Camden ('LBC').

This Planning Statement is submitted in support of the application and must be considered alongside the other documents, set out below, forming and supporting the planning application.

1.1 Description of Development

This application seeks Full Planning Permission for the following description of development:

"Demolition of existing fourth floor extension and erection of new two-storey extension to create two additional residential units (Class C3), with roof terraces."

Format of Submission

The application is formed and supported by the following documents:

Document	Author
Covering Letter	JLL
Application forms for Full Planning Permission	JLL
Certificates of Ownership and Agricultural Holdings	JLL
CIL Form	JLL
Site Location Plan at 1:1250	Studio Elca Ltd
Application Drawings	Studio Elca Ltd
Design and Access Statement	Studio Elca Ltd
Planning Statement	JLL
Air Quality Statement	GEM Air Quality Ltd
Daylight / Sunlight Assessment	Point 2 Surveyors
Energy Statement	Taylor Project Services
Structural Feasibility Statement	Simpson TWS

Please note that as this application is the first revision of an application for a development on the same site by the same applicant and submitted within 12 months of making the earlier application that was refused the submission qualifies for a 'free go'.

2. *The Site and Surroundings*

This section describes the site and surroundings to set the context for the development proposals.

2.1 **Site Description**

The site is located at the junction of Stukeley Street and Smart's Place. It measures 97sqm.

The site comprises a five-storey property with a basement level and accommodates 5 residential units (use class C3):

- 2 x 1-bedroom duplex;
- 2 X 2-bedroom flats; and
- 1 x 3-bedroom flat.

The building is located at the junction of Stukeley Street and Smart Place. The building is not statutory listed nor is it in the list of LBC locally listed buildings. The building has a white rendered finish at ground floor with a stock brick finish to the upper floors.

The site is however located within the Camden Central London Area and the Seven Dials Conservation Area (CA), sub area 3.

Stukeley Street and Smart Place are characterised by large commercial buildings of 4-6 storeys in height interspersed with residential flats.

The site is located in a highly accessible area by public transport being 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 (6b being the highest score).

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

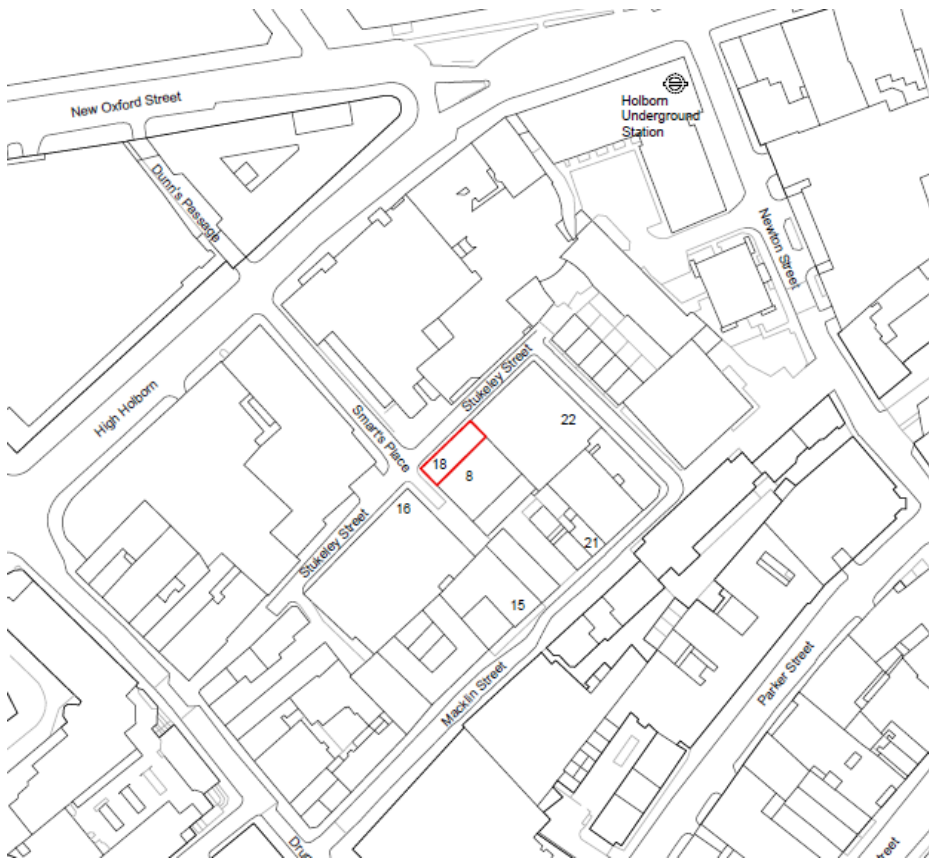


Figure 2.1: Extract of Site Location Plan

2.2 Planning Policy Designations

Under LBC's Proposals Map (updated August 2021) this site has the below designations (see **Figure 2.2**):



Figure 2.2: Extract from LBC Proposals Map

key:

-  Conservation Area
-  Central London Area

3. Planning History

Research into the online statutory planning history register held by LBC has revealed several planning history records for the site. This section summaries the relevant planning applications pertaining to the site.

Reference Number	Proposal	Date
2021/1532/P	Demolition of existing 4 th floor extension and erection of new 3 storey roof extension to create 3 additional residential units (Class C3), with roof terraces.	Refused 4 th August 2021
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

3.1 Summary

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.

More recently, planning application 2021/1532/P was refused in August 2021 for the removal of the existing 4h floor extension and the erection of a new 3 storey extension to create 3 additional residential units. The decision notice dated 4th August 2021 cited six reasons for refusal, as follows:

1. *The proposed rooftop, by reason of the proposed height, mass, detailed design and materials would compromise the form, character and appearance of the host building and this part of the Seven Dials Conservation Area, contrary to policy D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017.*

2. *In the absence of an air quality assessment, it has not been adequately demonstrated that future occupants would be protected from exposure to poor air quality, contrary to policy CC4 (Air quality) of the London Borough of Camden Local Plan 2017.*
3. *The proposed development would not achieve required carbon reduction targets, and as such would not minimise the effects of climate change or meet the highest feasible environmental standards, contrary to policy CC1 (Climate change mitigation) and CC2 (Adapting to climate change) of the London Borough of Camden Local Plan 2017.*
4. *The proposed development, in the absence of a legal agreement to secure a contribution to affordable housing, would fail to maximise the contribution of the site to the supply of affordable housing in the borough, contrary to policy H4 (Maximising the supply of affordable housing) of the Camden Local Plan 2017.*
5. *The proposed development, in the absence of a legal agreement securing car-free housing, would be likely to contribute unacceptably to parking stress and congestion in the surrounding area and fail to promote more sustainable and efficient forms of transport and active lifestyles, contrary to policies T2 (Parking and car-free development) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.*
6. *The proposed development, in the absence of a legal agreement to secure a construction management plan and appropriate financial contributions towards implementation support, would be likely to give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), T3 (Transport Infrastructure), T4 (Sustainable movement of goods and materials), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.*

4. The Proposed Development

This application seeks planning permission for the following description of development:

“Demolition of existing 4th floor extension and erection of new 2 storey extension to create 2 additional residential units (Class C3), with roof terraces.”

4.1 The Proposal

The proposal seeks to redevelop the building at 18 Stukeley Street by removing the existing 4th floor extension and provide a 2 storey extension to create 2 additional residential units and a roof terrace.

A summary of the proposals includes the following:

- The disassembly of the existing stepped back 2013 extension (4th floor which is built off a light structure)
- The provision of two new residential units (unit mix shown in table 4.1 below)
- The erection of a new stepped back two-storey extension with a roof terrace.
- Lift shaft extended to the fourth floor/storey to provide step-free access to all units.
- Stair access will be provided to the roof terrace that is accessible to the top two residential units.
- Provision of fixed planters along the roof terrace and a green roof with PV Panels.
- A total of 8 foldable cycle lockers will be provided.

Table 4.1: Existing and proposed floorspace schedule (GIA sqm)

Unit no.	Floor	Type	Existing GIA	Proposed GIA	Net gain GIA
1	LGF + GF	1 bed 2 person	63	63	0
2	LGF + GF	1 bed 2 person	48.5	48.5	0
3	1	2 bed 4 person	64	64	0
4	2	2 bed 4 person	67	67	0
5	3	2 bed 3 person	132	67	-65
6	4 + 5	2 bed 3 person	-	70.7	+70.7
7	4+5	2 bed 3 person	-	71.4	+71.4
Residential			374.5	451.6	+77.1
Common areas			39	56.6	17.6
TOTAL			413.5	508.2	+94.7

The total increase in floorspace is **94.7 sqm (GIA)**.

4.2 Difference from previous planning application (2021/1532/P)

These proposals have taken into consideration the Officers Report in the refusal of Planning Application 2021/1532/P and a number of changes have been provided to ensure the scheme is acceptable with Camden's Planning policies.

This includes removing a storey of the proposed extension and setting back the top storeys, providing two residential units instead of three and altering the layout to ensure all units meet the national space standards. The materials proposed on the two storey extension have been revised to complement the existing building.

The roof level now also provides PV panels in addition to the formerly proposed green roof to ensure that the scheme reaches the Council's carbon reduction requirements.

4.3 Transport

No car parking is proposed at the site and the scheme will be car free.

Each residential unit will be provided with 2 dedicated bicycle lockers, totalling 8 cycle spaces.

4.4 Sustainability

The proposed development is highly efficient with low energy lighting, mechanical ventilation throughout the building and a green roof and PV panels proposed at roof level.

5. Pre-Application consultation

- 5.1 This section summarises the pre-application consultation undertaken in advance of the application submission.
- 5.2 Following the refusal of Planning Application 2021/1532/P, a pre-application meeting was held virtually with planning and design officers on 11th August 2021 to discuss the revised proposals for the development to 18 Stukeley Street, which included a two storey extension and three additional residential units.
- 5.3 In the subsequent response letter issued on 22nd October 2021 it advised on the following planning considerations:
- Creation of new housing
 - Housing mix, unit size, quality of accommodation and affordable housing
 - Design and Heritage
 - Neighbouring amenity
 - Transport considerations
 - Energy and Sustainability
 - Air Quality
 - Water and drainage

Creation of new housing

- 5.4 Given the existing residential use of the building, additional residential units were considered acceptable and meets the requirement of Policy H1 which regards housing as the priority land-use.

Housing mix, unit size, quality of accommodation and affordable housing

Housing mix

- 5.5 In terms of housing mix, Officers were encouraged that two of the new dwellings and five of the seven flats would be high priority units and the only negative was the loss of a larger 3 bedroom unit.
- 5.6 The loss of a 3 bedroom unit was considered regrettable, but it was acknowledged that works could be carried out to convert the bedroom to an alternative use without planning permission and it was being replaced with a 2 bedroom unit.

Unit size and quality of accommodation

- 5.7 Officers advised that some of the units were under the nationally described space standards. The units at the fourth and fifth floor are required to be 79sqm but measured 73.5sqm and 68sqm, and the two bedroom flat at third floor are required to be 70sqm but were only 67sqm.

5.8 The proposals have been revised to ensure all units now meet the space standards requirements.

Affordable housing

5.9 As the total additional residential floorspace was above 100sqm GIA and more than one additional unit was being proposed Officers stated that a contribution to affordable housing was required.

5.10 The revised proposals have reduced in size and are now below the threshold set out under Policy H4 and therefore no affordable housing contribution is required or associated S106 agreement.

Design and Heritage

Massing

5.11 Officers continued to have concerns with the scale of the development. Officers stated the following:

“Rather than proposing a traditional set back between the fourth and fifth floors, the façade is slanted which serves to make the roof extension more prominent and very top heavy”

5.12 The revised design has responded by introducing a traditional set back between the fourth and fifth floors.

Rooftop extension

5.13 The feedback advised that the rooftop pavilion was not supported as it was visible from street level. The black railings at roof level were considered to further add to the sense of bulk in long views.

5.14 The proposals have been revised in the submission by removing the rooftop pavilion and being replaced by a motorised access hatch. The black railings have been replaced with a glass balustrade to reduce its visibility.

Windows

5.15 Concerns were raised that the windows on the extension were too large and that they did not sit well with the existing building’s fenestration. These comments have been listened to and have been revised so they now sit well with the existing building’s fenestration by keeping to the existing windows alignment.

5.16 Concerns were raised with the Juliet balconies and these balconies have now been removed.

Neighbouring amenity

5.17 The feedback confirmed that the only properties in residential use are the upper floors of 16 Stukeley Street and the recent planning permission at 8 Smart’s Place and that because no.8 has no windows to the north west elevation, future occupants would not be impacted by the proposed development.

5.18 Officers also confirmed that the submitted Daylight and Sunlight Assessment demonstrates that the neighbouring light levels would not be harmfully impacted.

5.19 The proposals were therefore considered acceptable in amenity terms and satisfies the policy requirements of Local Plan Policy A1.

Transport considerations

- 5.20 In terms of cycle parking the Council’s Transport Officer confirmed that the use of two folding cycles per apartment (a total of 6 cycle spaces) was acceptable given the existing constraints of the building.
- 5.21 The proposals are car-free and satisfies the car-free requirement of Policy T2. Officers advised a new Section 106 Agreement would need to be secured to ensure that all new residential units would also be on-street parking permit free in line with the original permission for residential use of the entire building.
- 5.22 The proposed development retains these considerations and therefore meets the requirements of policies T1 and T2.

Energy and Sustainability

- 5.23 Officers advised that the proposals are classed as a ‘minor development’ and therefore an energy statement is not required. A Sustainability Statement is expected, and the proposals are expected to meet overall carbon reduction targets of 19% below Part L of 2013 Building Regulations.
- 5.24 A Sustainability Statement has been produced by TPS which confirms that the submitted proposals meet carbon reduction targets of over 20% through a number of energy efficiency measures.

Air Quality

- 5.25 Officers advised that an air quality assessment would be required to support a future application given that the development would be creating additional dwellings (defined as a sensitive use) to an area of poor air quality.
- 5.26 An Air Quality Assessment has been produced by GEM Air Quality Ltd to satisfy the requirement of Policy CC4 and demonstrates how the development would mitigate any impacts on air quality and ensures that exposure to poor air quality is reduced.

Water and drainage

- 5.27 Officers advised that redeveloping the site presents an opportunity to manage drainage and surface water on-site using Sustainable Drainage Systems.
- 5.28 As part of the proposals, planters, a green roof, and other soft landscaping measures have been included and more details are provided in the submitted Design and Access Statement.

6. *Relevant Planning Policies*

This section provides an overview of national, regional and local policies and other material considerations against which the planning application will be assessed.

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 (LBC) comprises the following documents:

- The London Plan (adopted March 2021);
- Camden Local Plan (adopted July 2017).

LBC is under a legal duty to have regard to all material considerations. This includes the Government's National Planning Policy Framework (NPPF) (2021), National Planning Practice Guidance (NPPG) (June 2021) and the requirements of relevant Circulars. This also includes Supplementary Planning Guidance and Documents (SPG and SPD) produced by LBC and the GLA. Other material considerations include the Camden Planning Guidance (CPGs) and the Seven Dials CA Statement (2003).

6.1 **National Planning Policy Framework (NPPF)**

The NPPF was updated in June 2019 by the Government and replaced the 2012 version. The NPPF is considered fundamental to Government Reforms to promote economic growth and make the planning system more accessible. The NPPF sets out the Government's overarching economic, environmental and social planning policies in England and how these are expected to be applied.

Achieving Sustainable Development

Paragraph 7 of the NPPF makes clear that "the purpose of the planning system is to contribute to the achievement of sustainable development". Paragraph 8 expands on this advising that the planning system has 3 overarching economic, social and environmental objectives, "which are interdependent and need to be pursued in mutually supportive ways".

The economic objective is "to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure".

Paragraph 80 further advises that "planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities

for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future”.

Paragraph 11 of the NPPF is essentially the ‘cornerstone’ of the UK planning system and sets out the “presumption in favour of sustainable development”. Indeed, it states that for decision-taking ‘sustainable development’ 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”. However, the NPPF it is clear at paragraph 12 that the “the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making”.

In addition, paragraph 38 states that 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”.

Design

Paragraph 124 notes that design is considered a key consideration within the NPPF and a key aspect of sustainable development, helping to create better places to live and work.

Paragraph 127 states that planning policies and decisions should ensure that developments:

“ 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.”

Heritage

Paragraph 197 states that the effect of a proposal on the significance of a non-designated heritage asset should be taken into account when determining an application. In addition, it states that “a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

Paragraph 201 advises that “not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance.”

Energy

Paragraph 148 states “The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

At paragraph 153, the NPPF states that local planning authorities should expect new developments to:

- “Comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
- Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.”

6.2 ***The London Plan: The Spatial Development Strategy for Greater London (March 2021)***

“The London Plan is the overall strategic plan for London. It sets out a fully integrated economic, environmental, transport and social framework for the development of the capital over the next 20-25 years and forms part of the development plan for Greater London. London Boroughs’ Local Plans should be in general conformity with the London Plan, and its policies guide decisions on planning applications by Councils and the Mayor.”

Central Activities Zone (CAZ)

As shown in the figure below, the site is designated in the CAZ (see **Figure 6.1**).

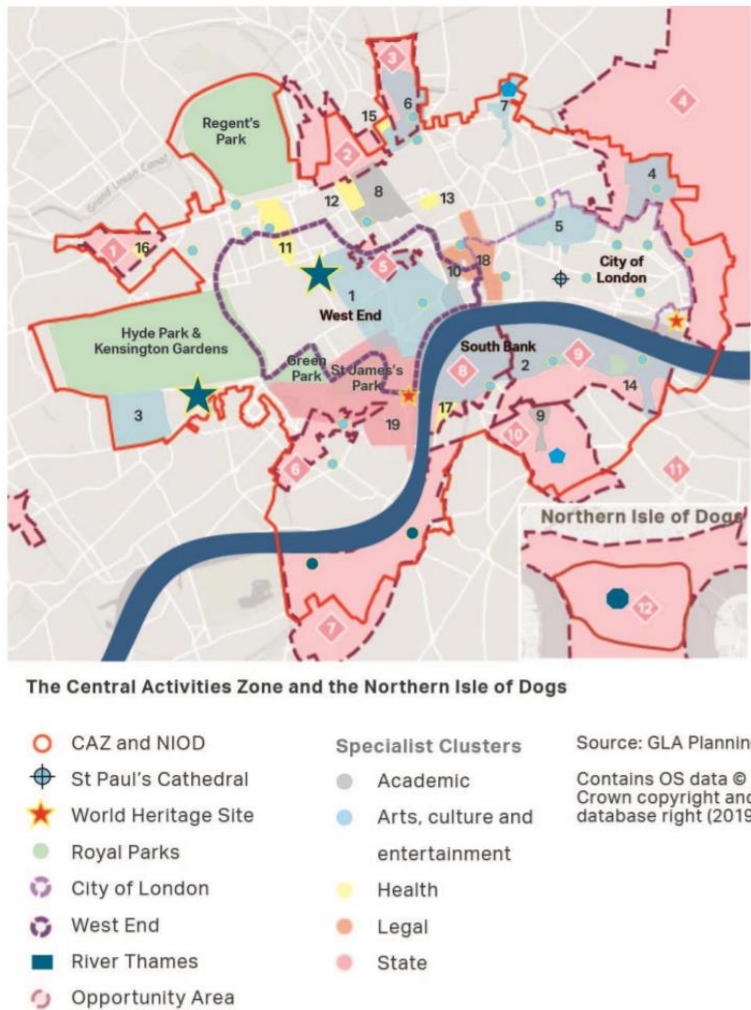


Figure 6.1: The CAZ Diagram extracted from the London Plan (March 2021)

Under **Policy SD4 (The Central Activities Zone (CAZ))**, development should enhance and promote the unique international, national and London wide roles of the CAZ. Development should sustain and enhance the distinctive environment and heritage of the CAZ. In addition, proposals should promote and enhance the tourism functions of the CAZ for residents, workers and visitors.

Housing

Policy H2 (Small Sites) encourages Boroughs to pro-actively support well designed new homes on small sites (below 0.25 hectares in size).

Policy H10 (Housing size mix) states that proposals should consist of a range of size of units. This should take into account the location of the site, with a higher proportion of one and two bed units being more appropriate in areas with higher public transport access and connectivity.

Design

Policy D4 (Delivering good design) seeks that proposals deliver good design and Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.

Policy D5 (Inclusive Design) requires the principles of inclusive design to have been integrated into the proposed development. The Mayor promotes high quality architecture and design. A Design and Access Statement should be submitted in support of a planning application and include an inclusive design statement.

Heritage

Policy HC1 (Heritage conservation and growth) states 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.

Environment, Energy and Sustainability

Policy SI 1 (Improving Air Quality) requires proposals to reduce emissions “to meet the requirements of Air Quality Neutral or to make the impact of the development on local air quality acceptable.”

Policy SI 2 (Minimising Greenhouse Gas Emissions) requires development proposals to be net zero carbon. Greenhouse gas emissions are therefore encouraged to be reduced in accordance with the following energy hierarchy:

1. Be lean: use less energy;
2. Be clean: supply energy efficiently; and
3. Be green: use renewable energy.

A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development and non-residential development should achieve 15% through energy efficiency measures. For any shortfall, this should be provided either through a cash in lieu contribution to the borough's carbon offset fund, or off-site.

Policy SI7 (Reducing waste and supporting the circular economy) seeks that proposals have adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables and food.

Policy SI13 (Sustainable drainage) advises that proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Transport (Including Parking)

Policy T5 (Cycling) requires development to provide secure, integrated, convenient and accessible cycle parking facilities in accordance with the minimum standards. The policy set out that for other uses not included in the cycle parking minimum standards, the most relevant other standard should be considered.

Policy T6 (Car parking) seeks that car-free development should be the starting point for all development proposals.

6.3 Camden local Plan

Growth and Spatial Delivery

Policy G1 (Delivery and location of growth) advises that the Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.

Housing

Policy H1 (Maximising housing supply) 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. The policy states that self-contained housing as the priority land-use of the Local Plan and where sites are underused LBC expect the maximum reasonable provision of housing.

Policy H3 (Protecting existing homes) advises that the council will aim to ensure that existing housing continues to meet the needs of existing and future households.

Policy H4 (Maximising the supply of affordable housing) expects a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.

Policy H6 (Housing choice and mix) seeks to secure high quality accessible homes by expecting all units to meet the nationally described space standards, requiring 90% of new-build homes in each development to be accessible and adaptable and requiring 10% of new build self-contained homes to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user.

Policy H7 (Large and small homes) states that the council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development having regard to the evidence of local needs, the character of the site and any constraints on developing the site for a mix of homes of different sizes.

Design and Heritage

Policy D1 (Design) encourages high quality design in proposals. The Council will require that development:

- respects local context and character;
- preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- is of sustainable and durable construction and adaptable to different activities and land uses;
- comprises details and materials that are of high quality and complement the local character;
- 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;
- is inclusive and accessible for all;
- promotes health;
- is secure and designed to minimise crime and antisocial behaviour;
- responds to natural features and preserves gardens and other open space;
- 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,
- incorporates outdoor amenity space;
- preserves strategic and local views;
- for housing, provides a high standard of accommodation; and
- carefully integrates building services equipment.

Policy D2 (Heritage) 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.

Amenity

Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours and the factors that are considered include:

- Visual privacy, outlook
- Sunlight, daylight and overshadowing
- Transport impacts
- Impacts of the construction phase, including the use of Construction Management Plans
- Noise and vibration levels
- Odour, fumes and dust

Policy A4 (Noise and vibration) advises that planning permission will not be granted if the development is likely to generate unacceptable noise and vibration impacts.

Policy C5 (Safety and security) requires appropriate security and community safety measures in buildings.

Policy C6 (Access for all) seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. This includes ensuring buildings meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.

Sustainability

Policy CC1 (Climate change mitigation) requires proposals to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

Policy CC2 (Adapting to climate change) requires development to adopt appropriate climate change adaptation measures such as reducing surface water run through the use of Sustainable Drainage Systems, incorporating bio-diverse roofs and reducing the impact of urban and dwelling overheating.

Policy CC3 (Water and flooding) requires development to incorporate water efficiency measures and utilise Sustainable Drainage Systems in line with the drainage hierarchy.

Policy CC4 (Air Quality) states Air Quality Assessments are required where development is likely to expose residents to high levels of air pollution. This should include measures to mitigate any air quality impacts.

Policy CC5 (Waste) expects developments to include facilities for the storage and collection of waste and recycling.

Transport

Policy T1 (Prioritising walking, cycling and public transport) encourages sustainable transport and for cycling development must provide accessible, secure cycling parking facilities that exceed the minimum standards in the London Plan.

Policy T2 (Parking and car free development) requires all new developments to be car-free.

Delivering and monitoring

Policy DM1 (Delivery and monitoring) will use planning contributions where appropriate to support sustainable development, secure the facilities to meet the development's needs and mitigate the impact of development.

7. *The Case for Planning Permission*

This section assesses the key planning considerations relating to the proposals, taking into account planning policies as well as material considerations, to make the case to justify the grant of planning permission.

The following issues are key to the application and considered in turn below:

- **Land Use** (*Principle of residential use*)
- **Housing mix, unit size, quality of accommodation and affordable housing**
- **Design and Heritage Considerations** (*Scale, Height and Massing, Building Design, Layout and Materials*)
- **Impact on Amenity** (*Daylight and Sunlight, Privacy, Overlooking and Air Quality*)
- **Energy and Sustainability** (*Energy and Sustainability*)
- **Transport Considerations** (*car and cycle parking*)

7.3 Land Use

The proposals seek to continue the existing residential use already permitted under application 2012/6680/P and to create two additional residential units through a two-storey extension. The continued use and extension of this residential element had been agreed within the Officer's Report of the refusal to Planning Application 2021/1532/P.

Housing is regarded as the priority land use of the Local Plan as set out in Policy H1 and the Council makes housing its top priority when considering the future of unused and underused land and buildings.

Given that a residential use is already in place on the site, the proposal for additional homes is considered appropriate, and the proposals would therefore comply with Policy H1 in this regard.

The proposals are therefore acceptable in land use terms.

7.4 Mix of unit sizes

The proposals seek the provision of 2 x 1-bed flats and 5 x 2-bed flats which would see a net uplift of 2 new residential flats on site.

Policy H7 seeks to provide a range of unit sizes to meet demand across the Borough. For market housing units, table 1 of this policy considers 1-bedroom units to have a lower priority than 2 and 3-bedroom units.

Officers advised during the pre-application stage that although the loss of a 3-bedroom unit would be regrettable, that works could be carried out to this dwelling to convert a bedroom to an alternative room use without requiring planning permission, and it is recognised that 2-bedroom units still provide homes for families.

As such, the proposals conform with Policy H7 and the unit mix is considered acceptable.

Design and layout

Policy H6 encourages the design of all housing in the borough to provide functional, adaptable and accessible spaces and Policy D1 expects all housing units to provide a high standard of accommodation.

The existing building does not align with the Technical Housing Standards and all dwellings as proposed will meet the nationally described space standards and this includes the two duplex units on the top two storeys.

Not all development would benefit from outside amenity space, but as this is same as the current situation, this was considered acceptable by Officers in the previous submission.

Step-free access would be provided to the new units via the existing lift which would be extended upwards. This is an improvement to the existing building with the lift extending to the fourth floor to ensure there is step free access to all units. An internal staircase then connects the fourth floor to the roof.

The proposals would therefore provide an acceptable standard of accommodation for future occupants.

Affordable housing

Policy H4 expects a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.

In this case, as the proposals create an uplift of less than 100sqm GIA, no contribution towards affordable housing is required.

7.5 Design and heritage

The Council's design policies aim to achieve the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 requires development to be of the highest architectural and urban design quality which improves the function, appearance and character of the area and Policy D2 requires proposals to preserve and enhance Camden's rich and diverse heritage assets and their settings, including conservation areas. In this case, 18 Stukeley Street is not recognised in any documents to be of specific importance or architectural merit and it not statutorily or locally listed.

The site is located within sub area 3 of the Seven Dials Conservation Area. The Seven Dials Conservation Area Statement confirms that there is no architectural style or historic period that dominates the character of the area. It is noted that it is the combination of the diverse building types, uses and building heights that contributes to the special character of the Conservation Area.

Officers consider that the original building is an attractive, traditional warehouse-style building on a prominent corner. The previous proposals were refused as they were considered to be unacceptable due to the height, massing, detailed design and materiality of the proposed extensions.

The below sub-sections highlight how this revised submission has addressed officers' concerns.

Height and Massing

The proposals are a result of an analysis of the varied character and appearance of the Seven Dials Conservation Area and of the planning history of neighbouring buildings which includes 8 Smart's Place.

Planning application 2021/1532/P proposed a three-storey extension which Officers considered would stretch out the façade and overwhelm the neighbouring building and streetscene.

The proposals have responded by removing one of these storeys to provide a two-storey extension and by introducing a traditional set-back. The new fourth floor massing will be stepped back from the existing building volume, with a new coping stone replacing the existing brick parapet constructed in 2013 under planning permission 2012/6680/P. The fifth-floor massing will also be stepped back further from the fourth floor. The railings have also been removed on the roof terrace and replaced with a glass balustrade to reduce its visibility.

The proposed massing is a response to the neighbouring building at 8 Smart's Place, for which permission was granted in March 2020 under reference 2019/1420/P for a three-storey extension. This consented development will rise 7 metres above 18 Stukeley Street's top floor and is considered to have a negative impact on the streetscape, with a plain wall facing Stukeley Street and visible from all angles around the site, including in long distance views from the intersection of High Holborn and Stukeley Street.

By contrast, the modest stepped-back two storey extension hereby proposed is considered to be a positive contribution to the appearance of 18 Stukeley Street which will not affect any views in a negative way. The extension would integrate with the original fabric and result in an exciting, contemporary addition to this 20th century building and in a balanced and proportionate building.

Detailed design and materiality

In the previous submission the use of Staffordshire blue bricks on the extension was considered as an inappropriate choice of material and Officers did not agree on the design intention that the extension should be contrasting to the existing building. Officers recommended that the extension should be subservient to the existing building.

This submission therefore looks to respond to the existing building and ensure it is in keeping with the character of the existing building and the Seven Dials Conservation Area. Consequently, the materials proposed at fourth floor level are London Stock Bricks, thereby matching the colour and appearance of the existing structure and emphasizing the existing qualities of the building. The proposed extension will not change the character of the site and will retain the original body of the building whilst replicating the original design details in the extension.

The building therefore retains the 20th century warehouse-like architectural style and makes a positive contribution to the existing building and the Seven Dials Conservation Area.

Windows

Officers detailed that the proposed window designs at the top two storeys would not respect the character of the existing building for either the refused planning permission or the revised proposals at first pre-app. Concerns were made as to the windows being too large in size which gave it a more domestic appearance that did not sit well with the existing building's fenestration. These comments have been listened to and the windows have been revised so they now sit well with the existing building's fenestration.

The windows at the fourth and fifth floor levels are timber windows with a slanted stone bay. The fourth-floor windows on both facades have a modern slim look, maintaining the existing symmetrical fenestration arrangement and enhancing the hierarchy of the building. The fifth-floor windows will have narrower proportions, creating a more residential look to the fifth floor which keeps to the existing fenestration arrangement and in alignment with the new room arrangement at this floor for the new units.

For improved privacy and proportion, the windows at both fourth and fifth floors will be placed 900mm above the floor level.

The revised proposals respect and complement the character of the original building and its appearance and introduces an exciting new addition to the building based on the original design and fenestration.

Overall, the proposals protect the special significance of the conservation area, contribute to the architectural and massing variety of the area and preserve the original character of the building. The proposals therefore meet the requirements of policies D1 and D2 and are considered to be acceptable in design and heritage terms.

7.6 Neighbouring Amenity

Policy A1 seeks to protect the amenity of residents by ensuring the impact of development is fully considered and would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise, daylight and sunlight.

It is worth noting that the closest properties that could be impacted from the proposals are 16 and 20-22 Stukeley Street and 8 Smart's Place. All these properties are in commercial, office or education use apart from the upper floors of 16 Stukeley Street and one residential unit in the consented scheme at 8 Smart's Place.

Daylight and Sunlight

A Daylight and Sunlight report has been prepared by Point 2 in support of the application. This report assesses the potential daylight/sunlight and overshadowing effects to the surrounding residential properties. It has been undertaken in accordance with the BRE Guidelines 'Site layout planning for daylight and sunlight: A guide to good practice.'

The VSC method of assessment demonstrates that 84% of the windows will meet the strict application of the BRE guidelines and in relation to NSL methodology, the results show that 93% of the rooms will meet the strict application of 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, the results demonstrate very good levels of light, demonstrating full BRE compliance.

In summary, recognising the extreme urban context of the area, the proposed development relates very well to neighbouring residential properties.

Air Quality

An Air Quality Statement has been prepared by GEM Air Quality Ltd in support of the planning application as Officers advised at the pre-application meeting that although not a major development a basic air quality assessment would be expected with the submission.

The mitigation measures detailed in the statement include measures within the construction phase and in operation. At the construction phase Table 8 of the report details appropriate mitigation measures to ensure the impact of dust soiling and PM10 can be reduced to negligible. This includes site management, operating machinery and waste management. In operation, mitigation measures focus on the use of filtered ventilation system which result in future occupants not having to rely on opening windows or doors to ventilate the premises and reduces the concentrations of NO2 well below the air quality objective within the building.

The Air Quality Statement therefore demonstrates compliance with Policy CC4 by seeking to ensure that the impact of development on air quality is mitigated and ensures that exposure to poor air quality is reduced, particularly for residents on site.

7.7 Energy and Sustainability

The assessment for the proposed development has been assessed via an Energy Statement produced by TPS. This Statement demonstrates that there is an estimated 20.2% reduction in carbon dioxide emissions relative to the baseline.

The previous planning application 2021/1532/P had an estimated 10 to 15% reduction in carbon dioxide emissions and was refused for failing to achieve the required carbon reduction targets of 19% below Part L of 2013 Building Regulations set out in policies CC1 and CC2. These new proposals have included the same measures in the previous application but also propose a 1.90kWp photovoltaic array to achieve an additional 5.2% reduction to ensure the proposals comply with Policy CC1 and reach the required carbon reduction targets.

The Energy Strategy sets out several energy efficiency measures required to achieve the carbon dioxide saving. A summary can be found below:

- Excellent building fabric values reducing the building's heat losses
- Mechanical ventilation with heat recovery throughout the building
- Low energy and highly efficient lighting
- Improvement in natural day lighting
- Green roof proposed
- Photovoltaic array of 1.90kWp connected directly to the apartments.

For full information on energy and sustainability and its compliance with planning policy, please refer to the Energy statement as prepared by TPS.

7.8 Transport considerations

In line with Policy T1 of the Local Plan, the Council expects cycle parking at developments to be provided in accordance with the standards set out in the London Plan.

For residential uses, the requirements are 1 space per 1 bedroom unit, 1.5 spaces per 2 person -1 bedroom unit and 2 spaces per all other units. Eight foldable bicycle spaces and lockers are provided.

The Council's Transport Officer confirmed that the use of two folding cycles per apartment was acceptable given the existing constraints of the building. This was also acknowledged in the Members Briefing report that there was insufficient space within the building to accommodate a central ground level floor cycle storage and that sufficient space existed within each flat to accommodate cycles if required.

The proposals are car-free and thus satisfy the car-free requirement of Policy T2. The applicant agrees to enter into any Section 106 agreement to ensure that the new residential units are also on-street parking permit-free in line with the original permission. Overall, the proposals meet the requirements of Policies T1 and T2.

7.9 Water and drainage

The proposals provide an improvement from the existing situation in terms of drainage as the existing site is built on hardstanding and has no permeable surfaces. The proposals provide planters, a green roof terrace and soft landscaping measures on roof level.

7.10 Section 106 Agreement

The applicant agrees to the imposition of a S106 agreement to secure a construction management plan as advised in the pre-application advice.

The existing flats are encumbered by a parking permit-free requirement in a section 106 agreement, and it is agreed that the proposed flats will be similarly restricted.

8. *Scheme Benefits*

In presenting an assessment of the overall planning policy case and in addressing the planning balance, it is necessary to consider the benefits of the proposed development. The NPPF sets out that the “*presumption in favour of sustainable development*” is the golden thread running through both plan making and decision taking. The scheme is wholly in accordance with this principle.

Economic

- **Local economic boost** – The development will secure employment opportunities for the local area.
- **Viability** – The proposed development will ensure a viable, long-term future for the site.

Social / Community Benefits

- **Increase in housing supply** – The proposals will result in the addition of two new 2-bedroom units, a priority housing mix in the borough.
- **Roof terrace** – increased amenity space and allowing the opportunity to grow food for personal use.

Environmental Benefits

- **Use of Previously Developed Land** – In line with sustainable planning principles, this development involves the redevelopment of previously developed land and makes the best use of that land.
- **Improved design and layout** – As set out in the accompanying Design and Access Statement, the development will result in an improved layout which follows and complements the fenestration and proportions of the existing building. The proposed extensions provide additional floorspace, allowing for an improved and more efficient internal layout and better accommodation.
- **Conservation Area benefits** – the scheme will screen the large flank wall permitted for 8 Smart’s Place, thereby enhancing the appearance of the conservation area.

- **Energy efficiency** – reducing carbon dioxide emissions with the building and a number of energy efficiency measures.
- **Highly Accessible Location**– The site has excellent accessibility to public transport facilities, considered wholly necessary for proposed occupiers.
- **Roof terrace** – fixed planters and a green roof allows for the enhancement of biodiversity whilst the PV panels shall incorporate renewable energy. There will be a net gain via the urban greening factor of 0.27.

Appendix 1 – Pre-application meeting feedback

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