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Our ref: NJB/SAWE/KAT/U0014114

Your ref: PP-11267047

08 June 2022

Dear Sir

Mount Pleasant – The Postmark: Land to the west of Royal Mail Sorting Office bounded by Phoenix Place, Mount Pleasant, Gough Street & Calthorpe Street, Camden WC1

Application for planning permission – Change of Use of Gym to Residential Unit (Class C3)

We write on behalf of our client, Taylor Wimpey London (the “Applicant”), to submit the enclosed documents in support of a planning application for the change of use of the existing gym of Core A6 of the ‘Phoenix Place’ development at the above address (“the Site”).

Planning permission is sought for the following:

“Conversion of internal residential amenity space (residents’ gym) to a one-bedroom, two-person residential unit (C3) with outdoor terrace at Core A6, Phase 1 of the Phoenix Place development.”

This letter provides a comprehensive review of relevant planning policy in relation to the Proposed Development. It sets out the planning justification for the Proposed Development and contains a detailed assessment in relation to relevant Development Plan policies and other material planning considerations

1.0 Site and Background

The proposals relate to the “Phoenix Place” part of the Mount Pleasant development, which is located on the west side of Phoenix Place, within the London Borough of Camden.

Full planning permission was granted at the Site under application reference on 30 March 2015 for the following:

“Comprehensive redevelopment, following the demolition of existing buildings, to construct four new buildings ranging from 5 to 15 storeys (above basement level) in height, to provide 38,724 sq.m. (GIA) of residential floorspace (345 dwellings) (Class C3), 823 sq.m. (GIA) of flexible retail and community floorspace (Use Classes A1, A2, A3, D1 or D2), with associated energy centre, waste and storage areas, basement level residential car parking (54 spaces, the re-provision of Royal Mail staff car parking (approx. 196 spaces) cycle

parking, residential car parking (431 residential spaces) hard and soft landscaping to provide public and private areas of open spaces, alterations to the public highway and all other necessary excavation and enabling works.”

The development formed part of a wider masterplan that also covered land on the east side of Phoenix Place for which a concurrent planning application was submitted. This site is described as “Calthorpe Street” and is within the London Borough of Islington (reference P2013/1423/FUL). Together they comprise comprehensive redevelopment in buildings up to 15 storeys comprising 681 residential units, 4,260 sq.m. of office space, 2,250 sq.m. retail and community space, with parking, landscaping and public realm works.

The two planning applications were called in by the Mayor of London for his determination on 21 January 2014 at the request of the applicant, Royal Mail Group (RMG), and were approved following a Stage 3 hearing on 3 October 2014. The two permissions are subject to a joint Section 106 legal agreement, between the Mayor of London, Islington Council, Camden Council and the Applicant at the time, RMG.

Taylor Wimpey London purchased the residential and commercial floorspace elements that make up Mount Pleasant from RMG in 2017. This excludes the office block (Block G) and the RMG sorting office elements at below ground level. The development is known as Postmark and collectively the parts of the masterplan are described by the Applicant as Phase 1, 2, 3 and 4. Construction is now complete on Phase 1 and units are being occupied. Construction is underway on Phase 2.

2.0 Relevant Planning History

As a result of continuing design development by the Applicant following acquisition, a number of non-material amendment applications have been submitted to improve the scheme.

Of particular note is a non-material amendment (reference 2018/0817/P), which was granted on 1 May 2018 for rearrangement to the core arrangements and layouts, as well as other changes to the mix and amount of floorspace arising from the technical design process. This included converting a number of voids that had been created by the level changes across the site into useable space. This included space at mezzanine level and the creation of new space for a resident’s gym in Core A6, which is the subject of this application.

In approving the NMA above, a new planning condition (51) was inserted which reads as follows:

The ancillary residential spaces annotated on the approved drawings, including the lower ground level cinema; upper ground level gym, concierge, lounge (with meeting room) and resident's amenity spaces/rooms on Levels 04 and 06, shall remain in ancillary use to the occupiers of the development and not be converted into self-contained residential flats.

Reason: The conversion of the ancillary spaces into flats would be a material change to the development requiring planning permission. Any creation of residential units would need to be assessed under planning policy (including policies G1, H1, H4, H6, H7, A1 and D1 of the Camden Local Plan 2017) and require further affordable housing and acceptable living conditions.

With Condition 51 in place, planning permission is required for the change of use under any circumstances.

Also of relevance is a non-material amendment under planning application (ref: 2019/3364/P) granted on 1 July 2019, which introduced a new Health and Wellness Centre in the basement of Phase 2, together with a series of other minor amendments. The Health and Wellbeing Centre is currently under construction and will

contain a pool, gym facility, sauna and steam rooms, and treatment rooms for use by residents of the development.

3.0 Pre-Application Discussions

A pre-application meeting was held with Camden Council Planning and Design Officers to discuss the proposals on 25 April 2022. The feedback was generally positive, and officers considered that the introduction of residential units in this location could be supported in principle.

Given that the unit has been built and occupied as a gym, a full standalone 'change of use' was agreed as an appropriate means of securing planning permission for the works, rather than as an amendment to the main planning permission for the wider site.

4.0 The Proposals

Following completion of the new health and wellness centre (under application reference 2019/3364/P), which is better located, larger and with enhanced facilities, the Applicant and their advisors have deduced that there will be a surplus of fitness/wellness spaces within the Mount Pleasant development. Following a detailed review, the Applicant has confirmed that this floorspace is no longer required or appropriate for amenity purposes and could be used in a more sustainable way. As such this application seeks to repurpose the space as a new home in contravention of Condition 51.

The Wellness Centre is currently under construction and is due to open in March 2023 and the existing gym would not close until the new Wellness Centre is up and running. At no point would the residents be left without amenity facilities.

The energy centre has the capacity to satisfy the additional new home and will remain above the carbon reduction target set in the approved Masterplan Energy Strategy.

The new home will have access to the existing cycle spaces within the Phoenix Place development but will not have access to a car parking space or on-street parking permits. This would be secured through a Section 106 agreement.

The proposal results in a minor change to the building envelope along The Walk and Phoenix Place where a new opening in the external wall is proposed to access the proposed terrace amenity space. Otherwise, the existing/approved elevations remain unchanged.

More details of the external changes can be found on Phoenix Place Elevation (dwg no. 05-201 Po1) and The Walk (South) Elevations (dwg no. 05-207 PO1).

The internal changes will provide for a generously space 1-bedroom 2 person apartment of 76.02 sq.m.

5.0 Planning Policy Context and Assessment

Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

The statutory development plan consists of:

- i. The London Plan (2021); and
- ii. Camden Council's Development Plan which consists of the Local Plan (2017), Policies Map, Site Allocation Document (2013) and various Area Plans (in this case the Bunhill and Clerkenwell AAP).

6.0 Principle of Development

Current gym use

The existing gym was created following the grant of planning permission for the wider development, making efficient use of void space at upper ground level that was created by level changes across the site. There was no requirement in the original planning permission for residential amenity facilities such as the gym, and it was an addition that was deemed appropriate at the time to reflect market trends and resident expectations. It has served a function for new residents of Phase 1, but as the Health and Wellness Centre is coming forward as part of Phase 2, it has been established that latter will more than adequately cater for the needs of the residents within the development. The phased nature of the development means that the gym will not be wound up until the new Centre is open. As such, there would be no perceived loss in amenity provision across the wider development and existing and future residents will be adequately catered for.

Housing

Increasing housing supply is one of the Mayor's key strategic objectives and this is supported by London Plan Policy H1 which sets out minimum annual housing targets for each Local Planning Authority ('LPA') to meet the total annual target for London of 522,870 homes. Table 4.1, identifies a ten-year housing completion target of 10,380 for LBC [2019/20 to 2028/29]. Local Plan Policy H1 sets out that self-contained housing is the priority land use across the Borough. The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.

Strategic Policy GG4 of the London Plan sets out that development should ensure that more homes are delivered which meet high standards of design and create mixed and inclusive communities. Policy G1 of Camden's Local Plan echoes this, stating that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden, *"resisting development that makes inefficient use of Camden's limited land"*.

The proposal optimises the efficient use of the site by sustainably providing an additional new home for the Borough by occupying built form that is not required for any other purpose or use. Overall, the provision of a much-needed new home for Camden in a high-quality development is a sustainable solution that makes best use of the site.

Housing Mix

Camden's Local Plan Policy H6 states that "the Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs". Policy H7 of Camden's Local Plan states that "the Council will aim to secure a range of homes of different sizes that will continue to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.

The approved Phoenix Place housing mix comprises 87 3-bedroom apartments (26%); 163 2-bedroom apartments (48%); and 88 1-bedroom apartments (26%). The introduction of a 1-bed (2 person) apartment would have little impact upon the overall housing mix. It will be a unit suited to the development, site and highly accessible central location well served by public transport and is not likely to impact on child density given its size.

In summary, given the context of the wider development which comprises residential uses with ground floor commercial uses, the introduction of new residential accommodation is appropriate for this this location.

7.0 Affordable Housing

London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. Local Plan Policy H4 sets out that Camden expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100 sq.m GIA or more. The Council will seek to negotiate the maximum reasonable amount of affordable housing on a sliding scale basis - starting at 2% for one home and increasing by 2% of for each home added to capacity.

Supporting paragraph 3.111 sets out that in the case of proposals with capacity for fewer than 10 additional homes (1,000 sq.m GIA), the Council will accept a payment-in-lieu of affordable housing. Camden's Housing CPG (2021) provides specific guidance on both housing and affordable housing in mixed use development and specifically the requirements of Local Plan Policies H2, H4, and H6.

Whilst the proposed residential unit does not meet this 100 sq.m threshold, the Council highlighted during pre-application discussions that the balance of tenures across the masterplan site would be altered by the proposal and that consideration would be expected in terms of affordable housing delivery. Various options have been discussed including changing the tenure of a consented unit in order to maintain the balance.

In this instance, it is considered that a payment-in-lieu (PIL) is an appropriate means of meeting Camden's requirements, noting that based on the sliding scale target the affordable housing required would not be equivalent to a whole dwelling, and the obstacles to on-site delivery given the advanced stage of the development. This approach was agreed via the pre-application process with Camden Council officers and based on PIL calculations set out in the Council's Housing CPG, would result in a payment of circa £8,700. This will be secured via a S106 Agreement.

8.0 Design and Residential Quality

London Plan Policy D6 provides detailed guidance on housing quality and standards, and all housing developments to have adequately sized rooms in line with the minimum internal space standards for new dwellings set out at Table 3.1 of the London Plan, which align with the Nationally Described Space Standards. Table 3.2 specifies the key qualitative aspects which should be addressed in the design of housing developments.

At a local level, Camden Local Plan Policy D1 seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use as well as inclusive and accessible for all.

Paragraph 7.32 of Camden's Local Plan states that all residential developments are required to be designed and built to create high quality homes. The Council will seek to ensure that residential development, both new build and change of use:

- is self-contained and has its own secure private entrance;
- has good ceiling heights and room sizes;
- is dual aspect except in exceptional circumstances;
- has good natural light and ventilation;
- has good insulation from noise and vibration;
- has a permanent partition between eating and sleeping areas (studio flats are acceptable where they provide adequate space to separate activities);
- incorporates adequate storage space;
- incorporates outdoor amenity space including balconies or terraces; and
- is accessible and adaptable for a range of occupiers.

Paragraph 7.33 of Camden's Local Plan states that "new dwellings and conversions to residential use will be expected to meet the government's nationally described space standard as set out in the London Plan. The Council will also require development to adhere to the Mayor's Housing Supplementary Planning Guidance".

At 76.02 sq.m the proposed new home exceeds London Plan Table 3.1 'Minimum internal space standards for new dwellings' for a 1-bedroom 2-person dwelling (50 sq.m). At over 7 sq.m., the balcony also size exceeds minimum standards and has level access from the living area. There are no other external alterations to note. A wheelchair accessible WC is provided, with conventional shaped rooms that provide adequate turning areas.

The apartment is north-east facing, benefitting from open aspect across Phoenix Place and cross ventilation due to the position of the balcony door. The existing window arrangements, layout and depth of the apartment will ensure that it receives sufficient daylight and sunlight in line with other homes in this location. Floor to ceiling heights and room sizes accord with standards with sufficient space for storage. Enhanced insulation would be provided given the adjacency to the gas intake room.

9.0 Amenity

London Plan Policy D3 sets out that development proposals should deliver appropriate outlook, privacy and amenity. Policy A1 of the Local Plan highlights that the Council will seek to protect the quality of life of occupiers and neighbours.

The proposal will maintain and potentially improve the amenity of surrounding residents by creating a compatible new residential which will attract less footfall than the existing ancillary gym. The nature of the external alterations and position of the terrace facing onto Phoenix Place and the new Square are such that there would be no adverse impact upon neighbouring residential occupiers' outlook, privacy daylight, or sunlight.

10. Cycle Parking

Policy T5 of the London Plan outlines that development proposals should secure the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located, and in line with the minimum standards. Local Plan Policy T1 sets out that the Council will promote sustainable transport by prioritising cycling in the borough and ensure a safe and accessible environment for cyclists.

Table 10.2 in the London Plan sets out the required cycle parking spaces for residential units. The requirement for a 1 bedroom, 2 person dwelling is 1.5 spaces.

Condition 19 of the original planning permission secured at least 275 residential cycle parking spaces for Building A and a cycle parking strategy for Phase 1 was approved under ref 2019/0693/P, demonstrating sufficient secure space in the basement, and level access from The Walk.

The Applicant has confirmed that there is sufficient space within the existing Phoenix Place development cycle stores to accommodate this additional residential unit. The development is therefore considered to accord with London Plan Policy T5.

11.0 Car Parking

Local Plan Policy T2 sets out that the Council will limit the availability of parking and require all new developments in the borough to be car-free. No on-street or on-site parking permits shall be issued in connection with new developments and the Council will use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits.

No car parking is proposed as part of this application, and the residents will not have access to the existing car parking within the Phoenix Place development or on surrounding streets. The Applicant is willing to enter into a S106 agreement to secure these commitments.

12.0 Waste

Policy CC5 of the Local Plan seeks to ensure that developments include facilities for the storage and collection of waste and recycling.

The refuse strategy for Phase 1 has been approved under ref 2018/2192/P. There are residential bin stores in the basement nearby to each residential core, and the proposed apartment would make use of A6 Bin Store, which has ample space to accommodate waste and recycling from an additional unit.

13. Energy

The energy strategy for Phoenix Place comprises a district heating network with an energy centre in the basement to serve all apartments. Confirmation has been received from SVM Consulting Engineers that the energy centre has sufficient capacity to accommodate the residential unit and that this change will have no substantial implication upon the MPP1 Energy Strategy and associated carbon savings to the development.

14. Water Supply

Condition 8 of the original planning permission required impact studies of the existing water supply to be submitted and approved in consultation with Thames Water. This study, which demonstrated that the existing network would be capable of supplying adequate pressure to the development and was approved under ref 2018/1541/P. With the water efficiency measures and consumption limits of 105 litres per person per day (Condition 43) secured in the approved scheme in place, the addition of a 1-bed 2 person apartment would have an indiscernible impact on water infrastructure.

14. Application Documentation

In line with the validation requirements of the Council, the following documents, along with this cover letter have been submitted via Planning Portal (PP-11267047):

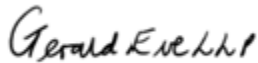
- Completed application form, prepared by Gerald Eve LLP;

- Site location plan, prepared by Broadway Malyan;
- Existing and proposed plans and elevations, prepared by Broadway Malyan; and
- Letter of compliance (energy), prepared by SVM Consulting Engineers.

The requisite fee of £462 (plus a £32.30 Planning Portal fee) for the planning application has been paid online via the Planning Portal.

We trust that we have provided all the material required for the purposes of validation and therefore await confirmation of the registration and validation of this application shortly. In the meantime should you have any queries regarding this application please contact Sam Wells (0203 486 3794) or Kathryn Tyne (0203 486 3735) of this office.

Yours faithfully



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