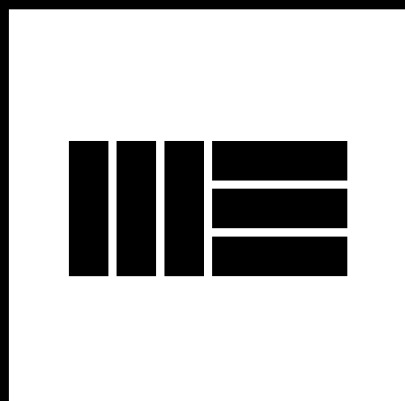


NO. 14 JOHN STREET, LONDON WC1N 2EB

PLANNING STATEMENT

APPLICATION FOR FULL PLANNING PERMISSION AND LISTED BUILDING CONSENT

JULY 2022



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1.0 EXECUTIVE SUMMARY

- 1.1 This Planning Statement forms part of the application for planning permission and listed building consent (“the Application”) submitted by J&B Ashley Limited (“the Applicant”) to the London Borough of Camden (“LBC”) for the conversion and refurbishment of No. 14 John Street, London, WC1N 2EB (“the Site” / “the Building”), to provide a single-family dwelling (**Section 2**).
- 1.2 The Site is No. 14 John Street, part of a terrace. It is located within the London Borough of Camden just to the east of Great Ormond Street Hospital. The Building was in residential use until the 1980s when it was converted for use as offices (**Section 3**).
- 1.3 The subject Building forms part of a group listing relating to Nos. 10-20 John Street which is Grade II listed. The Site is also located within the Bloomsbury Conservation Area (**Section 3**).
- 1.4 The Scheme ensures that the Site is brought back into its original residential use, through the creation of a high quality residential space with modern and efficient floorplates. Returning the Building back into its original use would result in an enhancement to the significance of the listed building, outweighing the loss of employment in this case. (**Section 6**).
- 1.5 Overall, the Proposed Development is in accordance with the national, regional and local planning policy, including other material considerations such as emerging policy and guidance. The Scheme would provide a number of planning benefits over and above the existing situation (**Section 7**).

2.0 INTRODUCTION AND BACKGROUND

2.1 This Planning Statement forms part of the application for planning permission and listed building consent (“the Application”) submitted by J&B Ashley Limited (“the Applicant”) to the London Borough of Camden (“LBC”) for the conversion and refurbishment of No. 14 John Street, London, WC1N 2ED (“the Site” / “the Building”), reinstating the original plan form to provide a single-family dwelling.

2.2 This Application outlines plans to reconfigure and refurbish the Grade II listed property at No. 14 John Street, whilst converting it from its current use as an office, back into a residential townhouse.

Planning Application

2.3 This Planning Statement (“the / this Statement”) has been prepared to cover the Application for planning permission and listed building consent for No. 14 John Street.

2.4 Full details of the Proposed Development are set out in the separate Design and Access Statements that accompany the application, prepared by Marek Wojciechowski Architects (“MWA”).

2.5 The description of development for the Application, which seeks full planning permission and listed building consent, is as follows:

“Change of use of building from office use (Class E) to residential (Class C3) to form a self-contained dwelling over LG, G + 4 storeys, internal refurbishment and associated works.”

Purpose and format of the Planning Statement

2.6 The purpose of this Planning Statement is to provide information to allow for an informed assessment of the Proposed Development against relevant national, regional and local planning policy and other material considerations.

2.7 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the Application have been considered. This Statement brings together the findings of the technical reports identified below and, having regard to these, provides a balanced planning assessment of the merits of the proposals.

2.8 The scope of supporting information has been established with regard to the national and local list requirements.

2.9 A Document Schedule has been prepared for each of the two applications. **Table 1.1** confirms the project team responsible for each matter:

Table 1.1 – Schedule of Application Submission Documents

DOC REF	NAME OF DOCUMENT / FILE	AUTHOR
(1)	Schedule 14JS-1: Document Schedule	Montagu Evans
(2)	Cover Letter	Montagu Evans
(3)	Application Form: Full Planning and Listed Building Consent	Montagu Evans
(4)	Community Infrastructure Levy	Montagu Evans
(5)	Schedule 14JS-2: Drawing Schedule	Montagu Evans
(6)	Site Location Plan	MW-A
(7)	Application Drawings	MW-A
(8)	Design and Access Statement	MW-A
(9)	Planning Statement	Montagu Evans
(10)	Heritage Statement	The Heritage Practice
(11)	Marketing Report	Robert Irving Burns
(12)	Sustainability Statement	Webb Yates Engineers
(13)	Transport Statement	Motion
(14)	Construction Demolition Management Plan Pro-Forma	Motion

2.10 This Planning Statement demonstrates that the overall Scheme would:

- Deliver sustainable development of brownfield land within Central London, in line with the overarching approach to development outlined in the NPPF;
- Ensure that the Site is brought back into residential use, through the creation of high quality residential space with modern and efficient floorplates, designed for family accommodation;
- Deliver a design of high quality architecture that would be well-related to the surrounding context, including preserving and enhancing the character and appearance of the conservation areas and setting of nearby listed buildings;
- Result in an enhancement to the significance of the listed building, returning the building back to its original use;
- Deliver a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the building; and
- Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development which would promote other means of travel such as cycling and walking.

2.11 **Section 3** of this Statement provides background information on the Sites including its planning history. **Section 4** sets out details of the Scheme. **Section 5** summarises the planning policy relevant to the Site. The two Application proposals are assessed against these policies in **Section 6**. A summary and conclusions are contained within **Section 7**.

3.0 APPLICATION SITE AND SURROUNDINGS

Application Site

- 3.1 The Site is located within the administrative area of the London Borough of Camden (“LBC”). It is situated within the south east corner of the Borough, with the boundary to the City of London just to the east and the City of Westminster to the south of the Site. The site area comprises approximately 0.048 hectares. A Site Location Plan is enclosed within the submission.
- 3.2 The Site forms part of the Grade II listed terrace running north-south. The property forms part of a terrace of 11 substantial houses (10-20 John Street – consecutive) dating from 1799 - 1824.
- 3.3 The Building, which forms part of a uniform terrace of Georgian townhouses, originally comprised of four storeys and basements with 3 windows on each level. Currently, the property comprises an office building covering the basement, ground, first, second and third floors with the layout of a residential dwelling on the fourth floor. The building is constructed of yellow stock brick with incised stucco at basement and ground floor levels.
- 3.4 The Building has undergone some alteration during its history including the shift from residential to office use on the basement, ground and three upper floors during the late 1980s. The Building was previously occupied by the Society for the Protection of Animals Abroad (SPANNA) but is currently vacant, as of January 2022.
- 3.5 The existing Building comprises approximately 480.1 sqm of gross internal area.
- 3.6 The Building is Grade II listed and is located within Bloomsbury Conservation Area. A large proportion of buildings within this area are listed, often ‘group listed’.
- 3.7 A full description of the existing Building is provided within the accompanying Design and Access Statement prepared by MWA and Heritage Statement prepared by The Heritage Practice.

Surrounding Area

- 3.8 The surrounding area is predominantly characterised by a variety of uses, such as offices, residential, hotels, diplomatic and educational buildings, owing to its central London location. The surrounding area is most renowned for its history of strong literary and publishing connections.
- 3.9 As set out above, the Site is located within the Bloomsbury Conservation Area which is characterised by its formally planned arrangement of streets enclosed by mainly three and four storey developments. The urban character of the broad streets is interspersed by formal squares which provide landscape dominated focal points to the area. Russell Square, Queen Square Gardens, Brunswick Square Gardens and Coram’s Fields among many more, are located within close proximity to the Site.
- 3.10 The terraced houses extend both north and south of the Site, forming John Street which is the continuation of Doughty Street, south of Doughty Mews and Roger Street. John Street also leads to Theobalds Road (A401) which is a busy thoroughfare running east-west which leads onto the areas of Clerkenwell and Farringdon.
- 3.11 The architecture of the surrounding area is predominantly of the Georgian era with some exceptions for example Bedford House, situated to the north-west of the Site.
- 3.12 To the west of the Site lies the Great Ormond Street Hospital, a world class leading children’s hospital. The Charles Dickens Museum, the author’s former home, is situated to the north of the Site.

Heritage

3.13 The subject Building forms part of a group listing relating to Nos. 10-20 John Street (and attached railings) which is Grade II listed.

3.14 The list entry (ref. 1379156) states:

“11 terraced houses. 1799-1824. No.20, facade rebuilt in facsimile c1950. Multi-coloured stock brick with yellow stock brick patching. Rusticated stucco ground floors with band at 1st floor levels. No.20 stucco facade to John Street with rusticated ground floor; return to Roger Street, yellow stock brick. 4 storeys and basements. 3 windows each; No.10 with 3-window (blind) return to Northington Street. No.20, 3 storeys and basement. 2 windows and 3-window return with 2 storey, 3-window rear extension. Gauged brick flat arches (No.10 reddened) to recessed sashes, mostly with glazing bars. Cast-iron balconies to 1st floor windows of Nos 12-19. Parapets. Original fluted lead rainwater heads and pipes. No.10: round-arched doorway with mutule cornice-head, sidelights, radial fanlight and panelled door. Moulded cornice to parapet.

INTERIOR with stick baluster stair in entrance hall with modillion cornice. No.11: round-arched doorway with fanlight and C20 door.

INTERIOR: altered but noted to retain wooden fireplace with dentil cornice on ground floor, marble fireplace on the 1st floor. Stairs with shaped balusters and shaped ends in hallway with cornice formed of paired modillions. No.12: round-arched doorway with fluted surround, mutule cornice-head, radial fanlight and panelled double doors.

INTERIOR: noted to retain marble fireplace in ground floor rear room. Shaped ends to stairs. No.13: similar doorway to No.12.

INTERIOR: noted to retain marble fireplaces ground floor front and 1st floor front and rear rooms. Stairs with square balusters and shaped ends in hallway whose cornice has guttae decoration. End wall with round-headed niches each side of landing window. Some added partitions. No.14: similar doorway to No.12 with patterned radial fanlight.

INTERIOR: noted to retain stairs with square balusters in front hallway with guttae cornice decoration. Round-headed niches each side of landing window. No.15: slightly projecting. Round-arched doorway with wooden, attached Greek Doric columns carrying cornice-head; fanlight and panelled door. 1st floor windows in shallow round-arched recesses linked by moulded impost bands.

INTERIOR: noted to retain marble fireplaces to ground and 1st floor. Stairs with square balusters. No.16: similar doorway to No.12. INTERIOR: noted to have additions but to retain marble fireplace in ground floor front room and stairs with square balusters. No.17: similar doorway to No.12 with patterned radial fanlight.

INTERIOR: noted to retain stairs with square balusters. Marble fireplace, with contemporary iron centre, ground floor rear room. Marble fireplace with sculptured leaf work, 1st floor front room. Contemporary China bell pulls and door plates. No.18: similar doorway to No.12 with patterned radial fanlight.

INTERIOR: noted to retain marble fireplaces with sculptured leaf work, 1st floor rooms. No.19: round-arched doorway with sidelights, fanlight and panelled door.

INTERIOR: noted to retain good marble fireplaces in ground and 1st floor rooms. No.20: stucco entrance portico on return with moulded cornice and parapet; radial fanlight and panelled double doors. Rounded brick angle. John Street elevation with pilasters rising through 1st and 2nd floors to carry entablature and blocking course. Architraved, recessed casement windows; ground and 1st floor with console-bracketed cornices.

SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to areas.”

3.15 The Site forms part of the Bloomsbury Conservation Area which contains a number of historic buildings and designated heritage assets. John Street itself is built up of terraced townhouses of four storeys in height which are also the predominant building type on the larger conservation area. It is in close proximity (within 100m) to the following assets:

- Nos. 2-9 John Street (and attached railings) (Grade II);
- Nos. 22-28 John Street (and attached railings) (Grade II);
- Nos. 29-36 John Street (and attached railings) (Grade II);
- No. 21 John Street, The Duke of York Public House on Roger Street and Nos.1-4 Mytre Court on John Mews (Grade II);
- No. 8 Northington Street (Grade II);
- No. 13 Northington Street (Grade II);
- Nos. 75 – 81 and 81A (and attached railings) Grays Inn Road (Grade II); and
- Nos. 63 – 69 Grays Inn Road (Grade II).

Accessibility

- 3.16 The Site has a Public Transport Accessibility Level (PTAL) of 6b which is categorised as 'excellent', as it is located in close proximity to a variety of public transport routes.
- 3.17 The nearest London Underground station is Chancery Lane (Central line) situated approximately 555 metres south and Russell Square (Piccadilly line) located approximately 620 metres north west of the Site. Additionally, Holborn (Central and Piccadilly lines) is located approximately 650 metres south west of the Site.
- 3.18 Being situated within north London, the Site is also located within close proximity to both London King's Cross and Euston, with all other national rail stations in London accessible via its excellent Underground links.
- 3.19 The Site is highly accessible to London's bus network. The nearest bus stop is approximately 120 metres from the Site at Clerkenwell Road Rosebery Avenue (with one route operating). In addition, approximately 140 metres south of the Site is Gray's Inn Road bus stop (with eight routes operating).

Site and Planning History

Site Background

- 3.20 John Street was originally developed in the late 18th century with some houses present on historic mapping from that period, however the remaining houses were constructed during the first decades of the 19th century for the upper classes. The street's fortunes declined as the 19th and 20th centuries progressed and many of the houses became offices for charities, trade associations, solicitors, accountants, quality surveyors and publishers.
- 3.21 No.14 John Street witnessed extensive alterations during the second half of the 20th century with the basement becoming a flat with a living room to the front, bedroom at the rear with a linen cupboard and bathroom in the centre. This was then changed during the 1980s with significant conversion of the Building into an office with a residential flat within the roof extension and three dormer windows to the rear.
- 3.22 From London County Council's bomb damage maps (1939-45), the Site appears to have escaped any damage however local buildings within the conservation sub-area did sustain damage beyond repair. The accompanying Heritage Statement provides a full history of known changes to the property.
- 3.23 In the case of the Application Site, the property appears to have been used as a residential townhouse for the majority of its history, up until the 1980s, when the planning history (see below) shows that consent was given for the majority of the property to be used as offices in 1985, with the retention of the fourth floor as a residential flat. There has never been a Council Tax record on this site, perhaps suggesting that the residential use at fourth floor had ceased prior to 1993.

Planning History

- 3.24 A planning history search of LBC's online planning register was undertaken and the following applications are of considered to be of relevance.

- 3.25 On 28 November 1984, an application for listed building consent (ref. 8470271) was granted for the *“installation of internal steel columns to basement, ground, first, second and third floors”*.
- 3.26 On 20 February 1985, planning permission (ref. 8401861) was refused for *“demolition of existing single storey structure at ground floor (rear) and rebuilding of enlarged single storey structure for office use”*. It was refused on the grounds that the proposed development was considered detrimental to the amenities of the basement flat by virtue of its proximity to the basement window and loss of open terraced area at ground floor (rear).
- 3.27 On 4 February 1985, listed building consent (ref. 8470298) was granted for the *“formation of a doorway from the ground floor hall to the front room.”*
- 3.28 On 10 July 1985, certificate of lawfulness (ref. 8501001) was granted for the *“Established Use Certificate in respect of the whole of the ground first and second floors for office purposes”*.
- 3.29 On 18 December 1985, planning permission (ref. 8501192) was granted for the *“the refurbishment and extension for use as offices on the basement ground and three upper floors and residential use on the fourth floor”*.
- 3.30 On 18 December 1985, listed building consent (ref. 8570210) was granted for *“the refurbishment and extension”*.
- 3.31 On 15 July 1986, approval of details for listed buildings (ref. 8670089) was granted for *“the submission of details for a front area staircase pursuant to condition 4 of a listed building consent dated 28/2/86”*.
- 3.32 On 15 July 1986, approval of details for listed buildings (ref. 8670089) was granted for *“the submission of details for a front area staircase pursuant to condition 4 of a listed building consent dated 28/2/86”*.
- 3.33 On 20 October 1986, listed building consent (ref. 8670370) was granted for *“Internal alterations involving the construction of two partition walls one in the front room of the basement and the other in the rear room of the ground floor as shown on drawing 85/3/1401/05/E marked in red”*.

4.0 DEVELOPMENT PROPOSALS

4.1 As set out in **Section 2** of this Statement, the Application seeks planning permission and listed building consent for the subdivision, reconfiguration, refurbishment and conversion of the existing listed building back to single residential use.

4.2 The Scheme would involve:

- Full refurbishment and conversion of a Grade II listed office building (Class E) into a single-family residential unit;
- Demolition of non-original closet wing at the rear of the property and reinstatement of windows to the original locations;
- Replacement of all non-original windows with six over six Georgian sashes;
- Removal of all non-original fittings and joinery;
- Minor reconfiguration of the plan layout;
- Refurbishment and reinstatement of the original floor finish, wall panelling and ceilings; and
- Demolition of non-original skylights that are visible from street level.

4.3 Further details of the Scheme are set out within the Design and Access Statement prepared by MWA which accompanies this submission.

Residential Townhouse

4.4 The Proposed Development seeks to convert the current office building back into one residential unit. This will see the current 480.1 sqm of Class E being converted to form 468.6 sqm Class C3 dwelling, providing a self-contained residential townhouse.

4.5 On the lower ground level, a study, courtyard, guest bedroom with ensuite, media room and utility room will be provided, in addition to a plant room and bike storage. At ground floor level, a formal reception room is proposed at the front of the property with a breakfast room in the centre and a kitchen towards the rear. The first floor will provide a drawing room at the front of the property which leads into a living room at the rear.

4.6 The upper two storeys will feature three bedrooms with ensuites. The master bedroom will have an additional dressing room. On the fourth floor there will be a games room, kitchenette and powder room.

Physical Alterations

4.7 As set out above, the proposals seek a number of internal and external alterations to the Building.

4.8 The principal works seek the removal of the non-original closet wing to the rear and the reinstatement of windows in original locations, recreating the original style of the Building.

4.9 Other external alterations including the replacement of all non-original windows with six over six Georgian sashes. Where possible, the existing materials are to be retained and refurbished, and where new materials are proposed to the main house, it will be ensured they are traditional. Additionally, all non-original fenestration will be replaced with traditionally detailed timber windows

4.10 The non-original skylights which are visible from street level will be demolished and replaced with one conservation style rooflight.

4.11 A number of internal alterations to the Building are required as part of its conversion back to residential use. Most notably, there will be restoration of all original decorative moulding and wall panelling with traditional decorative mouldings reinstated when needed and ensuring they are ordered and proportionate to the Early Georgian period. Additionally, original floorboards will be exposed and utilised as the floor finish to the ground, first and second floors.

- 4.12 All historic elements of the Building will be retained, with modern office elements removed as part of the conversion, including the replacement of commercial services with domestic services.
- 4.13 Full descriptions of the proposed internal works are set out within the Design and Access Statement.

Parking, Access and Storage

- 4.14 The Proposed Development is, for the most part, 'car free' and would not provide any on-site car parking. Presently, John Street is a one-way street with parking allocated on one side and is a controlled parking zone.
- 4.15 The main access will be via the front door on John Street but there is an entrance point within the basement. There is no rear access. Servicing of the property would be from John Street.
- 4.16 Cycle parking is to be provided on site, with space earmarked for two cycle spaces, within the front pavement vault at basement level.

5.0 PLANNING POLICY FRAMEWORK

5.1 This Application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context, and **Section 6** provides an assessment of the Application against the policies and guidance contained within these documents.

National Guidance

5.2 The revised National Planning Policy Framework (the “NPPF”) was published on 19 June 2021 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements, as well as previous versions of the NPPF, first published in 2012. The NPPF sets out the Government’s approach to planning matters and is a material consideration in the determination of planning applications.

5.3 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 2 states that decisions should apply a presumption in favour of sustainable development and goes on to state that:

“For decision taking this 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.”**

5.4 In March 2014, the Government published the Planning Practice Guidance (PPG) which is a material consideration in relation to planning applications. The PPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level. The PPG is a material consideration in the determination of applications.

Statutory Framework

5.5 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan unless material considerations indicate otherwise.

5.6 The Statutory Development Plan for the Site comprises the:

- London Plan (March 2021) (the “London Plan”); and
- London Borough of Camden Local Plan (July 2017) (the “Local Plan”).

Emerging Policy

Emerging LB Camden Policy

5.7 The current Local Plan was adopted on 3 July 2017 and forms the basis of the strategic and development management policies shaping planning decisions. Throughout 2018 to 2021, LBC updated its suite of Camden Planning Guidance documents to support the Local Plan.

5.8 The Local Development Scheme (August 2021) sets out that a review of the Local Plan is likely to commence in early/mid 2022. In the meantime, LBC is focusing on updating its 2013 Site Allocations Local Plan with adoption in Summer 2023.

Regional Guidance

5.9 The Greater London Authority (GLA) has published a number of supporting documents that are relevant in the consideration of this application. Of relevance are:

- SPG: Crossrail Funding (March 2016);
- SPG: Social Infrastructure (May 2015);
- SPG: Accessible London: Achieving an Inclusive Environment (October 2014);
- SPG: The control of dust and emissions during construction and demolition (July 2014);
- SPG: Shaping Neighbourhoods: Character and Context (June 2014);
- SPG: London Planning Statement (May 2014);
- SPG: Planning for Equality and Diversity in London (October 2007).
- SPG: Housing (March 2016);
- LPG: Housing Design Standards (2022);
- LPG: Air Quality Neutral (2021);
- LPG: Circular Economy Statements (2022); and
- LPG: Whole Life-Cycle Carbon Assessments (2022)

5.10 LBC has a number of adopted guidance documents which are material considerations in respect of the Application including:

- Access for All CPG (March 2019);
- Air Quality CPG (January 2021);
- Amenity CPG (January 2021);
- Biodiversity CPG (March 2018);
- Design (January 2021);
- Developer Contribution CPG (March 2019);
- Employment Sites & Business Premises CPG (January 2021);
- Energy Efficiency and Adaptation CPG (January 2021);
- Housing (January 2021); and
- Transport CPG (January 2021).

5.11 The GLA is currently consulting on the following relevant supporting documents:

- Sustainable Transport, Walking and Cycling;
- Housing Design Standards

5.12 In addition to the above, the *Bloomsbury Conservation Area Appraisal and Management Strategy* (April 2011) is a material consideration in the determination of this Application.

5.13 The remainder of this document identifies the key issues relevant to the determination of the Application and considers these in the context of relevant policy guidance.

5.14 The documents submitted as part of this Application also refer to other technical guidance and legislation which is relevant to particular planning issues.

Site Specific Designations

5.15 The Site is the subject of the following designations under the LBC Policies Map (March 2019):

- Central London Area (i.e. Central Activities Zone);
- Primrose Hill to St. Paul's Cathedral Protected Viewing Corridor (lateral assessment area); and
- Bloomsbury Conservation Area.

5.16 As noted previously, the Site forms part of a Grade II listed terrace.

6.0 PLANNING POLICY ASSESSMENT

6.1 Within this section, we assess the component parts of the proposed development against the statutory development plan and other material considerations as outlined in **Section 5**.

Loss of Office Floorspace

6.2 The lawful use of the Building is office use which falls under Class E of the Use Classes Order Amendment 2020 (historically Class B1a under the previous version of the UCO). The proposals, which seek to convert the building from office to residential use, has had regard to the relevant policies within the Camden Local Plan and the Employment Sites and Business Premises CPG (January 2021).

Relevant Policy and Guidance

6.3 **Local Plan Policy E2** (Employment premises and sites) states that the Council will protect sites that are suitable for continued business use, in particular premises for small businesses, businesses and services and those that support the functioning of the CAZ and local economy.

6.4 The Policy adds that LBC will resist development of business premises for non-business use unless it is demonstrated to the Council's satisfaction that:

- a. *“the site or building is no longer suitable for its existing business use; and*
- b. *that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.”*

6.5 Supporting paragraph 5.37 sets out that LC will consider whether there is potential for that use to continue and take account various factors including:

- *the suitability of the location for any business use;*
- *whether the premises are in a reasonable condition to allow the use to continue;*
- *the range of unit sizes it provides, particularly suitability for small businesses; and*
- *whether the business use is well related to nearby land uses.*

6.6 Further guidance is contained within the **Employment Sites and Business Premises Camden Planning Guidance** (March 2018) (“the CPG”). Paragraph 8 recognises that not all existing employment premises will be able to offer the same standards of accommodation as new build premises and that premises that are in need of modernisation may attract smaller businesses as the condition of the premises may produce lower rents compared to new built schemes.

6.7 Paragraph 9 sets out that when a loss of employment floorspace is proposed, evidence would be sought that applicants have fully explored alternative ways to retain business use of the space (e.g. re-provision or refurbishment) and outline the reasons why this would be deemed inappropriate.

6.8 Paragraph 54 sets out that in exceptional circumstances the Council may agree that change of use is acceptable and where this can be expected to result in a reduction of potential job opportunities for Camden residents, the Council will seek a contribution towards measures which create or promote opportunities for employment or training of local people. This would be sought where the net loss of employment space is 500 sqm (GIA) or more.

Suitability for Continued Business Use

6.9 The first part of Policy E2 is to consider the suitability of the premises for office use, which is also considered against the relevant parts of the Employment CPG.

6.10 The property is in a relatively condition and cannot meet the modern expectations of a commercial tenant due to being originally designed for a single family dwelling house.

6.11 There is an increased desire for the wellness and wellbeing facilities including outdoor spaces, bike racks, shower facilities and better ventilation. Currently, the property is unable to provide these facilities and it is unlikely any refurbishment would be able to provide sufficient amount of these facilities for the amount of occupiers without eating into the net usable floor space.

The provision of services is inadequate for the current market and the rigid layout presents many constraints when looking to improve the building's marketability. The current building presents issues on every floor with smaller confined rooms, not commensurate with today's market requirements.

6.12 The rigid layout and multiple-storeys limit the Building's marketability especially for hybrid working where one level is common to foster collaboration between staff. Additionally, the office layout is not suitable for accessible arrangements therefore creating marketability issues especially in terms of the Disability Discrimination Act. Furthermore, the WC provision within the Building is not suitable for a commercial space as WCs are not situated on every floor, nor are they level access. Commercial tenants expect such provision on each floor where possible so this further adds to the marketability issue of the Building.

6.13 The property would require substantial capital spending to bring it up to lettable standard which even then, does not guarantee letting of the property due to occupiers spatial and ergonomic trends. The attempts, so far, at letting out the property have not been successful despite online listings and physical real estate signage on the property.

6.14 The Building has other constraints including poor natural light and energy efficiency which means the modern requirements of an office, including BREAM rating, will be harder to meet.

6.15 The Employment Sites and Business Premises CPG provides further guidance on assessing proposals that involve a loss of a business use and the factors it will consider. The property is generally worn and in need of refurbishment, as well as substantial changes to modernise. It is currently vacant and is struggling to find a new tenant, therefore providing an opportunity to convert the Building back into its original use as a single family dwelling house.

6.16 Due to being vacant, the change of use would not result in the displacement of an existing business.

Possibility of Alternative Use

6.17 Due to the quality of the accommodation and with the heritage constraints of the building, any refurbishment would not create an open plan office space which would be better suited to office accommodation. It is also not possible to improve the accessibility of the offices beyond that which exists and it would not be possible to install lift access. There is also dated heating, lighting, WC, kitchen and IT facilities, all of which would be required to meet the standard of the modern office occupier.

6.18 The location of WCs and kitchens are dictated by the layouts of the original residential townhouse and it would not be possible to install additional facilities, without further compromising the usability of the office. Likewise, it would not be possible to install a new internal lift without punching through original floors, altering the plan form. Level access is not possible and external alterations to provide this is not deemed to be acceptable from a heritage perspective.

6.19 All existing services would need to be stripped out, replaced by new installation and they cannot be let with the existing specification and would require significant capital expenditure to upgrade the buildings. Even if new services were installed, the building would continue to suffer from its inherent limitations in its layout and would not fundamentally improve the space nor produce any enhanced rental prospects.

6.20 Other non-office business uses, such as industrial, warehousing, storage, research would clearly not be appropriate in these properties.

Marketing Evidence

6.21 Policy E2 and the CPG also requires that buildings are marketing for an appropriate period of time to consider the possibility of retaining the site for its existing use.

- 6.22 The property has been marketed by Robert Irving Burns (RIB), who consider themselves to be Central London's premier commercial and residential property company, and who were formed in 1962. They have a significant track record of letting employment space within Camden and the WC1 area (and beyond).
- 6.23 As noted above, the property was last occupied by a registered charity, SPANA, between 2010 and January 2022. The charity put their office on the market in late 2020, with a view to finding a more modern office that would suit the needs of the charity (as well as to increase the charity's reserves). They have since moved to a new premises on Ludgate Hill in the City of London, a modern office building.
- 6.24 RIB were instructed to market the property in February 2022. A visible letting board has been on site throughout the current marketing period since March 2022 and a photograph of which is contained within RIB's Marketing Report. At the time of writing, there has been a 5 month marketing period of continuous marketing.
- 6.25 The Marketing Report also contains the Marketing Brochure, which contains a description of the property, floor plans, photos and other relevant information. The existing lawful use of the premises (i.e. office use) were included within the marketing materials, as required by the CPG.
- 6.26 The marketing exercise has been explained, which confirms that:
- A to-let board was erected since March 2022, which has not yielded a single enquiry;
 - The property has been published on Zoopla, Rightmove, Novaloca and the RIB website;
 - Despite some traffic on the respective webpages, interest in the property has been limited, with many not clicking on or downloading the property details;
 - The property is listed on Agents Insight, where there were three agent-led requirements for single occupancy buildings. Feedback from this noted the current layout, number of floors, lack of modern amenities makes the property unviable.
 - RIB has issued the property details to 345 parties in their own database (of c. 3,500 applicants). This yielded a single enquiry, which was discounted due to lack of accessibility.
 - Other marketing has yielded two enquiries which resulted in two viewings
- 6.27 Other marketing has yielded two enquiries which resulted in two viewings, although neither of these have pursued the opportunity further.
- Medical operator – split over too many floors and lack of accessibility;
 - Design agency - split over too many floors and lack of accessibility.
- 6.28 In RIB's view, the asking rent reflects both the market and condition of the property. Ultimately, changes in occupier demand for more linear space and the need for more collaborative space that ticks all the Corporate Social Responsibility (CSR) boxes is more crucial than ever – especially adhering to inclusive accessibility standards.

The Office Market

- 6.29 The LBC Employment Land Study (2014) sets out that there are a number of different markets that operate within the borough, the Central London, Camden Town and outer Camden office markets and each have distinctive sub-markets which attract different types of operators. The markets have developed due to differing occupier requirements for premises which shape the areas they choose to operate.
- 6.30 The existing Building does not meet the requirements of these three office markets. Whilst located close to Midtown, near to the Central London office market, its small size and poor quality means it is unlikely to attract corporate occupiers who are looking for high quality office space in Central London. Despite increases in rental levels in Midtown, corporate occupiers still wish to locate to central locations rather than relocating to cheaper accommodation in the north of the borough.
- 6.31 The Building suffers from poor layout and lacks open floorplan which is sought after by start-up and micro businesses. It is more likely that SMEs would find more suitable spaces in Camden Town or Kentish Town where there is a growing hub of business space.

- 6.32 Further detail on the market is provided by RIB in their Marketing Report. It shows that there are currently 57 peer properties available in the Bloomsbury submarket that were a similar build and condition to the Site. Of these 57 properties, there were 172 spaces lettable, with the average transaction size in Bloomsbury being 5,768 sq. ft. typically over one floor.
- 6.33 Over the last five years, there has been 319 office lettings with a total of 47 whole building leasing deals, of which only 15 were comparable to No.14 John Street in term of floor plates. Only three of these were in the last two years, only one of which was not refurbished, nor met DDA accessibility requirements.
- 6.34 It is therefore clear that there are numerous premises on the market that have been purpose-built for office uses and would fit the similar tenant requirements of the space currently within John Street.
- 6.35 Furthermore, the 2020 change to the Use Classes Order enables more flexibility in commercial space so there is the potential for further space within LB Camden to come available for office use without the need for planning permission for its conversion.

Financial Contributions

- 6.36 As noted in Paragraph 54 of the CPG, the Council may seek a contribution from developments, which result in the loss of more than 500 sqm GIA of employment floorspace, towards measures which create or promote opportunities for employment or training of local people. This property falls just short of that threshold, with 480 sqm and therefore no payment in lieu is required in this case.

Alternative Use as Residential

- 6.37 **NPPF Paragraph 123** sets out that local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular:

“they should support the use of employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres and would be compatible with other policies in this Framework.”

- 6.38 The principle of residential development in this location is set out in further detail below. In recent years, planning permission has been granted for the conversion of a large number of properties in the Bloomsbury area, in John Street, Great James Street and the surrounding mews. Most of these are terraced properties which have undergone the same transition from original residential townhouses, to offices and back to their original use. These listed townhouses are therefore gradually returning to their former grandeur as domestic streets and no. 14 John Street would follow that trend.
- 6.39 In considering developments affecting listed buildings, LBC must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 6.40 **Paragraph 190 of the NPPF** sets out that in determining applications, the LPA should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
- 6.41 In this case, considerable importance and weight should be attached to the impact of development on the heritage asset and its significance.
- 6.42 The Proposed Development will return the house to its original use as a single family dwelling and will have no adverse effect on the identified significance of the Building. The Heritage Statement sets out that reinstatement would result in significant tangible as well as intuitive heritage benefits, resulting in substantial benefit to the architectural and historic interest of the Grade II listed buildings.
- 6.43 Exceptional circumstances therefore exist when considering the loss of employment use under Policy E2 as the residential use of the building would be in the interest of preserving and restoring the listed building to its original use. On balance,

the heritage benefits of reusing the building and the associated sensitive physical improvements to the Building provide the justification for the loss of employment floorspace.

- 6.44 This conversion would be entirely appropriate and would result in an enhancement to the significance of the listed building and conservation area as discussed later in this section.

Principle of Residential Development

- 6.45 The Proposed Development accords with the current thrust of planning policy at national, regional and local level, which places an emphasis on achieving sustainable development. In particular, adopted plan policy is extremely clear that housing is a priority land use in Camden.
- 6.46 Housing delivery is a key objective of the NPPF and it advocates for sufficient amount and variety of land to come forward to significantly boost the supply of housing (paragraph 60).
- 6.47 **Paragraph 68 of the NPPF** also requires local planning authorities to ensure planning policies identify a sufficient supply and mix of sites considering their availability, suitability and likely economic viability. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements, and developable sites or broad locations for growth for 6-15 years. An appropriate buffer should be included to ensure choice and competition in the market (paragraph 74).
- 6.48 **Paragraph 69** states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 6.49 **London Plan Policy H1** (Increasing Housing Supply) states that there is a *"need for 66,000 additional homes per year"*. The policy states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions.
- 6.50 Table 4.1 of the London Plan identifies an annual target of 1,038 new homes per annum in Camden (10,380 in total from 2019/20 to 2028/29).
- 6.51 The **London Plan Policy H2** (Small Sites) states that small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites through planning decisions.
- 6.52 Table 4.2 of the London Plan sets out an annual target of 328 new homes within Camden to be provided on small sites (10 year target of 3,280).
- 6.53 At the local level, **Policy H1** (Maximising housing supply) aims to secure a sufficient supply of homes and maximise the supply of housing to exceed the target of 16,800 additional homes between 2015/16 and 2030/31 (including 11,130 additional self-contained homes).
- 6.54 Policy H1 states that self-contained housing is the priority land use of the Local Plan. The policy also states that LBC will resist alternative development of sites already identified through a current planning permission, unless it is shown that it is no longer developable for housing.
- 6.55 The principle of prioritising the delivery of housing over other uses and maximising that delivery has long been established as acceptable in Camden.
- 6.56 As noted above, the principle of residential on this Site has already been established through its original use. The property was built as a residential dwelling and only converted to offices in the mid-1980s. It has, therefore, been in residential use for the majority of its lifetime and the proposals to convert it back to residential is justified in planning and heritage terms.
- 6.57 The provision of a townhouse on this Site fully accords with the aims of the development plan and would contribute to LBC meeting its targets for housing delivery. The siting of residential development in this location, close to other residential uses should be supported.

Affordable Housing

- 6.58 **Paragraph 63 of the NPPF** requires planning policies to specify the type of affordable housing required and set policies for meeting this need on site, unless off-site provision or an appropriate financial contribution in lieu can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 6.59 The provision of affordable housing should not be sought for residential developments that are not major developments, other than in rural areas, as required by NPPF paragraph 64.
- 6.60 **Policy H4 in the London Plan** emphasises that the strategic target for affordable homes is 50% within London with specific measures to achieve this aim outlined below:
- a. Requiring major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach
 - b. Using grant to increase affordable housing delivery beyond the level that would otherwise be provided
 - c. All affordable housing providers deliver at least 50% affordable housing or 60% for strategic partners.
 - d. Public sector land delivering at least 50% affordable homes
 - e. Industrial land appropriate for residential use delivering at least 50% affordable housing if resulting in net loss of industrial capacity
- 6.61 Policy H4 expresses the need for affordable housing to be provided on site with affordable housing only provided off-site or as a cash in lieu contribution in exceptional circumstance.
- 6.62 **Local Plan Policy H4** (Maximising the supply of affordable housing) seeks to provide 5,300 additional affordable homes from 2016 to 2031 and aims for an appropriate mix of affordable housing types. LBC expects a contribution to affordable housing from all developments that include housing and provide one or more additional homes.
- 6.63 The guideline mix, as set out in Policy H4 is 60% social-affordable rented housing and 40% intermediate housing and targets are based on an assessment of development capacity whereby 100 sqm (GIA) of housing is generally considered to create capacity for one home. The Policy identifies:
- *“a sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity;*
 - *an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings; and*
 - *where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;”*

- 6.64 The Proposed Development would provide a single residential unit within a listed building at 468.6 sqm (GIA), and therefore has a capacity for four homes based on the calculation set out in Policy H4. A payment-in-lieu of affordable housing is therefore acceptable on this Site.

Housing Mix

- 6.65 National planning policy contained within the NPPF requires a range of size, type and tenure of housing to address the need of different groups in the community, including affordable housing, families with children, older people and students. Paragraph 73 seeks to ensure that the size and location of homes will support a sustainable community and ensure that a variety of homes are provided.
- 6.66 **London Plan Policy H12** (Housing size mix) states that schemes should generally consist of a range of units and requires a consideration of the appropriate mix based on a number of qualitative criteria. This includes the need to deliver a range of affordable homes, the nature and location of the site, the aim to optimise housing potential and the role of one and two bedroom units in freeing up family housing.

- 6.67 The policy sets out that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes, although schemes consisting of mainly one-person and/or one-bedroom units should be resisted.
- 6.68 **Local Plan Policy H7** (Large and small homes) aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.
- 6.69 All housing development should contribute to meeting the priorities set out in the Dwelling Size Priorities Table, which identifies a high priority for two and three bed market units. However, Policy H7 also states that LBC will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, having regard to a number of considerations.
- 6.70 The Proposed Development would provide a single four-bedroom dwelling, with family accommodation being a high priority with Camden. Whilst the Site cannot provide a mix of units, it does meet the aims of Policy H7 with regard to providing a higher priority family housing unit. The four bedroom property is appropriate, given the Building's current form and layout, and the benefits of returning it to a single family dwelling.

Housing Design

- 6.71 **London Plan Policy D6** (Housing quality and standards) states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. The policy adds that housing development should provide adequately-sized rooms with comfortable and functional layouts.
- 6.72 The policy also states that LDFs should incorporate minimum space standards that generally conform to Table 3.1 of the London Plan, which is comparative to the Nationally Described Space Standards, introduced by the Government.
- 6.73 The property exceeds the minimum space standards for a four bedroom property, set out over six levels (B, G + 4).
- 6.74 Additionally, the **Mayor's Housing SPG** (2016) sets out a requirement for a minimum of 5 sqm of private outdoor space that should be provided for 1 – 2 person dwellings and an additional 1 sqm for each additional occupant (Standard 4.10.1). **London Plan Policy D6** also requires development to maximise the usability of outside amenity space.
- 6.75 The Proposed Development is somewhat constrained, with limited external access, as the rear of the property abuts the mews to the rear. However, private outdoor amenity space is provided for the property through the provision of a rear terrace at ground floor level, plus the provision of a rear courtyard at lower ground floor – which offer external access to the residents. Given the site's context, and its status as a listed building, the provision of this external space is considered to be acceptable.

Design Principles

- 6.76 High quality and inclusive design is encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development, and should contribute positively to making places better for people. Part 12 of the NPPF outlines the requirement for good design and sets out, at **Paragraph 130**, that development:
- (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.*

- 6.77 Chapter 3 of the London Plan sets out the Mayor's policies on a number of issues relating to London's places and spaces.
- 6.78 **Policy D5** (Inclusive Design) requires all new development in London to achieve the highest standards of accessible and inclusive design, while Policy D1 (London's form, character and capacity for growth) states that *"understanding the existing character and context of individual areas is essential in determining how different places may best develop in the future"*.
- 6.79 The GLA has also published Supplementary Guidance to the London Plan; 'SPG: Achieving an Inclusive Environment' (2014) provides further detailed advice and guidance on providing inclusive design in London.
- 6.80 LBC's **Local Plan Policy D1** (Design) seeks to secure high quality design in development and requires development to:
- (a) *"respects local context and character;*
 - (b) *preserves or enhances the historic environment and heritage assets...;*
 - (c) *is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
 - (d) *is of sustainable and durable construction and adaptable to different activities and land uses;*
 - (e) *comprises details and materials that are of high quality and complement the local character;*
 - (f) *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;*
 - (g) *is inclusive and accessible for all;*
 - (h) *promotes health;*
 - (i) *is secure and designed to minimise crime and antisocial behaviour;*
 - (j) *responds to natural features and preserves gardens and other open space;*
 - (k) *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,*
 - (l) *incorporates outdoor amenity space;*
 - (m) *preserves significant and protected views;*
 - (n) *for housing, provides a high standard of accommodation; and*
 - (o) *carefully integrates building services equipment."*
- 6.81 Policy D1 is supported by **Camden's Planning Guidance on Design**, adopted in March 2019.
- 6.82 LBC **Local Plan Policy C5** (Safety and Security) aims to make Camden a safer place and requires developments to demonstrate that they have incorporated design principles which contribute to community safety and security and for appropriate measures to be incorporated.
- 6.83 Full details of security are likely to come forward during detailed design and, if appropriate, could be reserved by way of a planning condition.
- 6.84 LBC **Local Plan Policy C6** (Access for All) seeks to promote fair access and remove barriers that prevent everyone from accessing facilities and opportunities. The policy expects buildings and places to meet the highest practicable standards of accessible and inclusive design with fully accessible routes through buildings and facilities in the most accessible parts of buildings.
- 6.85 Due to the historic nature of the property and its Grade II listed status, it is not possible to adhere to Building Regulations with regards to access and step free access cannot be provided throughout the building.
- 6.86 A Design and Access Statement, prepared by MWA, is submitted as part of the Application. This document sets out in detail an evaluation of the Scheme's design and how it responds to the context of the existing Building and surrounding area.

6.87 In accordance with policy requirements the proposals provide a sensitive design with alterations to the Building that are appropriate and sensitive in the context of its historic character and interest.

Heritage Considerations

6.88 The existing Building is Grade II listed and forms a group listing alongside the other properties along John Street. The Site is also located within the Bloomsbury Conservation Area and owing to its Central London location, the Site is within the proximity to a number of other listed buildings.

6.89 **Paragraph 194** of the NPPF states that:

“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”

6.90 **NPPF Paragraph 199** notes that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be.

6.91 Any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting should require, clear and convincing justification (NPPF Paragraph 199).

6.92 The Heritage Statement provides a full summary of the heritage policy and guidance.

6.93 **London Plan Policy HC1** states that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail, to provide an environment that is of local, national and international value.

6.94 **LBC Local Plan Policy D2 (Heritage)** outlines that the council will preserve and, where appropriate, enhance the rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

6.95 In relation to designated heritage assets (i.e. listed buildings and conservation areas), Policy D2 states:

“The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- (a) the nature of the heritage asset prevents all reasonable uses of the site;*
- (b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- (c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- (d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.”

6.96 In relation to conservation areas, Policy D2 sets out that LBC will:

- (e) “require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- (f) resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*

- (g) resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- (h) preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage."

6.97 In relation to listed buildings, Policy D2 sets out that LBC will preserve and enhance these through

- (i) "resist the total or substantial demolition of a listed building;
- (j) resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- (k) resist development that would cause harm to significance of a listed building through an effect on its setting."

6.98 A Heritage Statement has been prepared by the Heritage Practice, and should be read alongside this Planning Statement, the proposed drawings and the Design and Access Statement prepared by MWA.

6.99 The Statement confirms that the property is of high historical significance as it is of exceptional historical and aesthetic value plus considerable evidential value.

6.100 The proposed development will return the house to its original use as a single family dwelling and will have no adverse effect on the identified significance of the building. As noted above, reinstatement would result in significant tangible as well as intuitive heritage benefits resulting in substantial benefit to the architectural and historic interest of the Grade II listed buildings.

6.101 Missing architectural features such as panelling and chimney pieces would be actively conserved and restored through repair and replacement. The Proposed Development would result in the restoration of the Building's character and enjoyment as a dwelling house.

6.102 The appearance of the Building and the enhancement of the character area will be brought about through restoring the front of the Building with appropriately detailed early Georgian double hung sash windows. At the rear, the windows would be replaced to match the original, with the reinstatement of the basement lightwell.

6.103 Internally, the main spaces on all floors are to be retained, with the original form and proportion restored. Whilst there would be some minor modifications to allow the creation of bathrooms, there would be no loss of historic fabric or any feature which contributes positively to the character and special interest of the listed building.

6.104 The Heritage Statement concludes that

"The proposed reinstatement of the house's domestic use will be a significant enhancement and will be in keeping with the conversion of other buildings along John Street from office use to residential. The proposed works to the house will include a comprehensive refurbishment of its fabric and services in order to secure its ongoing beneficial use for the medium to long term, alongside beneficial enhancements to its internal and external character and special interest. The works to the rear addition will create attractive, modern living space beyond the main envelope of the listed building, in an area of lower significance and with no impact upon historic fabric or the high significance front façade of the listed building or the surrounding townscape."

6.105 Accordingly, the Proposed Development is considered to accord with the statutory provisions, the NPPF and the development plan, with regard to heritage and, as relevant, design.

Residential Amenity

6.106 **Local Plan Policy A1** (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity.

6.107 Policy A1 continues to state that LBC will:

- (e) "seek to ensure that the amenity of communities, occupiers and neighbours is protected;

- (f) seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;
- (g) resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
- (h) require mitigation measures where necessary.

6.108 The factors we will consider include:

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

6.109 To support the above policy, LBC has produced extensive guidance within its Amenity CPG.

Impact on Amenity

6.110 Local Plan Policy A1 is supported by the Camden CPG on Amenity which provides further guidance on the expectations that LBC has when considering the impact of schemes on daylight and sunlight levels. It notes that levels of reported daylight and sunlight will be considered flexibly taking into account site-specific circumstances and context.

6.111 The Proposed Development seeks to remove the 1985 rear addition to create a clearer hierarchy between the original and host building, whilst giving prominence to the original brick vault at basement level. The scheme is therefore reduced in size and impact on amenity, i.e. light or overlooking is not considered to be an issue in this case. There would be no new windows overlooking adjacent properties.

Construction Management Plans

6.112 The supporting text to Local Plan Policy A1 (paragraph 6.12) outlines that measures required to reduce the impact of demolition, excavation and construction works must be outlined within a Construction Management Plan (CMP).

6.113 In accordance with adopted plan policy and Camden Planning Guidance, the Construction Management Plan (CMP) Pro Forma has been drafted and submitted with this application by Motion.

6.114 This demonstrates how construction impacts will be minimised, in relation to site activity during works and the transport arrangements for vehicles servicing the Site.

6.115 We note that this draft Pro Forma would be progressed to a final version should planning permission be permitted. As is usual in Camden, this is likely to be the requirement of clause in the Section 106 legal agreement.

Conclusion

6.116 Overall, the Proposed Development has been designed to limit the impact on neighbouring residential (and other uses) amenity and ensure that future residents are afforded appropriate levels of amenity. The proposed alterations to the Building are minor, and would at least preserve the amenity currently enjoyed by nearby residents and occupiers. The aim of the project is to ensure that potential impacts from noise and odour are limited during construction. Furthermore, mitigation and management procedures can be put in place during construction and operation of the Building to ensure health and well-being in the local area is maintained.

Transport

- 6.117 Section 9 of the NPPF sets out the Government's policies with regard to transport. Paragraph 110 sets out that development should be ensured that:
- (a) *“appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - (b) *safe and suitable access to the site can be achieved for all users; and*
 - (c) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*
- 6.118 The chapter concludes at paragraph 113 that:
- “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”*
- 6.119 Chapter 10 of the London Plan provides the regional guidance for transport.
- 6.120 **Policy T1** (Strategic Approach to transport) outlines how development proposals should facilitate “the delivery of the Mayor’s strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041”. Additionally all development should make the most effective use of land, reflecting it’s connectivity and accessibility by existing and future public transport, walking and cycling routes and ensure any impact is mitigated.
- 6.121 **Policy T2** (Healthy Streets) aims to improve London’s health through delivering patterns of land use that facilitate residents making shorter and more regular trips by walking and cycling.
- 6.122 At the local level, **Local Plan Policy T1** (Prioritising walking, cycling and public transport) is the primary transport policy which promotes sustainable transport in the borough. The policy seeks to ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links.
- 6.123 The Site is located within Central London and therefore has access to a number of key services, which are within walking distance of the Site. The Site has an excellent public transport accessibility (PTAL 6b), which ensures excellent links to the Underground, National Rail and bus services.
- 6.124 A Transport Statement, prepared by Motion accompanies this Application. The report demonstrates that the Proposed Development, for the conversion of the Building, to form a single residential dwelling is expected to generate a negligible number of additional trips and would have negligible impact on the public highway network, especially as the development is ‘car free’. The Proposed Development on its own is likely to result in a reduction of trips. The majority of trips are likely to be made by walking, cycling or the use of public transport.
- 6.125 The Site is a highly accessible location with high public transport accessibility. The local area has minimal reliance on the private car. The Proposed Development would not provide any car parking.
- 6.126 The development would result in a negligible number of deliveries, which would be mainly contained to weekly food deliveries or parcels. This is not likely to result in a materially detrimental impact on the operation of the local highway network.
- 6.127 Overall, the Proposed Development is unlikely to result in a material effect on the highway network local to the Site and there are no highway or transport reasons why the development proposals should be resisted. Specific matters are addressed in further detail below.

Car Parking

- 6.128 The NPPF requires local authorities to consider parking provision within new developments based upon the accessibility of the development and the opportunities for public transport, and facilitate the provision of ultra-low emission vehicles.
- 6.129 **London Plan Policy T6** (Parking) outlines that the Mayor wishes to see car parking restricted in line with the levels of public transport accessibility and connectivity with a greater emphasis on car-free development. Whilst car-free development has no general parking, disabled persons parking should still be provided.
- 6.130 **Local Plan Policy T2** (Parking and car-free development) limits the availability of parking and requires all new development in the borough to be car-free. It is noted that the policy also supports the redevelopment of existing car parks for alternative uses. Car parking will be limited to spaces designated for disabled people where necessary and essential operating or servicing needs.
- 6.131 The Proposed Development does not provide any car parking spaces. As a result of its sustainable location and excellent accessibility to public transport and active travel modes, no additional car parking would be required. It is also appropriate in the context of its location, which is highly accessible and promotes the use of public transport, cycling and walking.

Cycle Parking

- 6.132 Both the NPPF and the London Plan promote cycling in locations which can be made sustainable.
- 6.133 **London Plan Policy T5** (cycling) outlines the Mayor's strategy to increase cycling within the capital. The policy outlines that development should contribute to the increase of cycling through the provision of cycle parking facilities and on site changing facilities. Furthermore, developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards.
- 6.134 Policy T5 (cycling), table 10.2 outlines that for C3-C4 use class (all dwellings), long-stay cycle parking facilities would need to be provided within the development with two spaces required. This is met with two cycle spaces provided in the plant room on the basement floor. There is no requirement for short-stay cycle parking.
- 6.135 To promote cycling in the borough and ensure a safe and accessible environment for cyclists, LBC will seek to ensure that development:
- provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within CPG7: Transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development; and
 - makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.

Sustainability

- 6.136 The NPPF supports the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourages the reuse of existing resources, including conversion of existing buildings, and encourages the use of renewable resources.
- 6.137 The London Plan sets out a number of core policies for major developments with regard to reducing carbon dioxide emissions and providing energy in a sustainable manner. The Proposed Development is a 'minor' scheme involving the conversion and refurbishment of a listed building to form a single residential unit.
- 6.138 **London Plan Policy SI 2** (Minimising Greenhouse Gas Emissions) states that development proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the 'be lean, be clean, be green and be seen' energy hierarchy. It seeks a 35% improvement in carbon reductions over 2013 Building Regulations for major developments with residential development advised to achieve 10%.

- 6.139 The London Plan contains a number of other adopted policies which are relevant to the sustainability of the development, including SI 4 (managing heat risk) and SI 7 (reducing waste and supporting the circular economy). Many of the GLA's policies are not suitable to be applied to minor developments.
- 6.140 At the local level, **Camden Local Plan Policy CC1** (Climate change mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and operation.
- 6.141 LBC promotes zero carbon development in accordance with the London Plan, requiring all development to reduce carbon dioxide emissions through following the steps of the energy hierarchy.
- 6.142 **Local Plan Policy CC2** (Adapting to climate change) requires development to be resilient to climate change and adopt appropriate adaptation measure, although many of those outlined within the policy are not applicable to a scheme of this size.
- 6.143 Policy CC2 also seeks to ensure that development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation. The policy expects domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM domestic refurbishment.
- 6.144 This Planning Application includes a Sustainability Statement, prepared by Webb Yates Engineers, which sets out the energy efficiency measures to reduce the energy demand of the Proposed Development, alongside carbon reductions and water efficiency strategies which have been incorporated into the design.
- 6.145 The building is exempt from Building Regulations Part L requirements due to its listed status. However, the Proposed Development has been designed with the aim of reducing operational energy and associated carbon emissions, whilst the embodied carbon content of materials will be minimised as far as possible.
- 6.146 The design follows the energy hierarchy, through seeking ways to reduce the need for energy and using energy more efficiently. However, the building is not capable of connecting to an existing low carbon heat network, and due to the nature of the building, the lack of space, and its Grade II listing, the viability of renewables is challenging and has been discounted.
- 6.147 These constraints limit the feasibility of utilising Low or Zero Carbon (LZC) technologies.
- 6.148 In addition, the cooling hierarchy has been followed and, as such, there is no active cooling proposed.
- 6.149 The Proposed Development would aim to minimise internal and external potable water usage and discourage the disposal of waste to landfill through good waste management during both operation and construction.
- 6.150 Overall, the sustainability strategy for this conversion stems from the use of more efficient services and maintenance such that it can be operated in an efficient way. High efficiency equipment and appliances will be installed throughout, although further use of technologies is challenging due to a number of limitations with the building.

Waste and Recycling

- 6.151 Camden **Local Plan Policy CC5** (Waste) seeks to make Camden a low waste borough and aims to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031. The policy also seeks to make sure that developments include facilities for the storage and collection of waste and recycling.
- 6.152 Waste storage and recycling bins will be provided in large, compartmented storage units in the kitchen. Refuse will be periodically taken out by occupants from the kitchen to the kerbside on the relevant collection date.

Community Infrastructure Levy

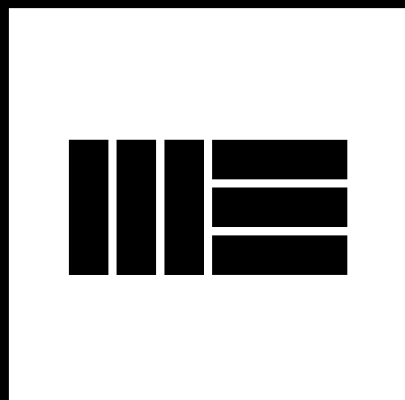
- 6.153 Within this Application, consideration is given to the 'MCIL2' requirements which came into effect on 1 April 2019 with a rate of £80 per sqm for residential floorspace.

- 6.154 In addition to the above, LB Camden adopted its Community Infrastructure Charging Schedule in December 2021 which has applied since 1st January 2022. This outlines a rate of £648 per sqm rate for residential developments within Zone C (Highgate and Hampstead area).
- 6.155 A CIL Form has been submitted with this Application which outlines the relevant information for the Scheme.

7.0 CONCLUSIONS

- 7.1 The Proposed Development to which this Statement relates, seeks the conversion and refurbishment of No. 14 John Street as part of its change of use to form a residential townhouse, and associated physical alterations.
- 7.2 The Planning Statement has assessed the Proposals against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act.
- 7.3 The Scheme has been formulated in accordance with the NPPF, the adopted London Plan and policies set out within the LBC Local Plan. It accords with the relevant policies of the adopted and emerging development plan, as well as being consistent with national planning policy.
- 7.4 Having regard to the assessment undertaken within this Statement, we consider the planning benefits arising from this scheme can be summarised as follows:
- Delivering sustainable development of brownfield land within Central London, in line with the overarching approach to development outlined in the NPPF;
 - Ensure that the Site is brought back into residential use, through the creation of high quality residential space with modern and efficient floorplates, designed for family accommodation;
 - Delivering a design of high quality architecture that would be well-related to the surrounding context, including preserving and enhancing the character and appearance of the conservation areas and setting of nearby listed buildings;
 - Resulting in an enhancement to the significance of the listed building, returning the building back to its original use;
 - Delivering a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the building; and
 - Contributing to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development which would promote other means of travel such as cycling and walking.
- 7.5 We note that the Proposed Development does not adhere to the full requirements of Policy E2, insofar that the loss of employment use is not supported by a full two year period of marketing evidence. However, the Proposed Development must be considered in relation to its overall planning balance, and it is considered that the significant benefits delivered in heritage terms, of returning this listed building back into its original use would outweigh the minor loss of employment use, in this case. That loss would not displace any existing business and is a relatively poor quality office building in the context of the modern requirements of operators, and therefore has limited prospects of future occupation.
- 7.6 The proposed conversion of the building to a single family house represents a significant enhancement to its special architectural and historic interest, which is also being sensitively refurbished.
- 7.7 In light of the above, we respectfully request that LBC grants planning permission and listed building consent for the Proposed Development.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.