



Planning Statement

340 Gray's Inn Road

“Change of use of first floor of office building to residential use and erection of a three storey (basement, ground and first floor) extension comprising two storeys of office accommodation and one storey of residential accommodation incorporating five self-contained flats”

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For and on behalf of CMT Design and Construction

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CONTENTS

1.0 Introduction and Summary

2.0 The Site

3.0 Proposal

4.0 Planning Policy Summary

5.0 Planning Assessment

7.0 Conclusion

Appendix 1 – Pre-Application written response



1.0 Introduction and Summary

1.1 The proposal seeks planning permission for the:

“Change of use of first floor of office building to residential use and erection of a three storey (basement, ground and first floor) extension comprising two storeys of office accommodation and one storey of residential accommodation incorporating five self-contained flats”

1.2 The proposals will extend the existing building at 340 Gray’s Inn Road to provide an uplift in the commercial floorspace from 410sqm to 606sqm (GIA), with five units of self-contained accommodation above (1x two-bed three person; 1x two-bed four-person and 3x one-bed two-person).

1.3 The extension has been designed to be viewed as a pavilion and has attractive architectural features based around a recessed archway design, which is a common feature of the conservation area.

1.4 The application follows on from a positive pre-application discussion on the principle of developing the site which also provided detailed guidance on the design. The proposal has been developed in accordance with this guidance and seeks to provide positive addition to the streetscape in this important location.

Submission Documents:

1.5 Relevant planning drawings and technical reports are submitted in support of the planning application in line with the Council’s planning validation requirements for an application for full planning permission.

1.6 The supporting reports accord with the information requirements set out in the pre-application letter and are as follows:

- Application Forms, Certificates and CIL Forms;
- Planning Statement prepared by West Green Planning;



- Design and Access Statement, prepared by Ruff Architects;
- Architectural plans/elevational drawings, prepared by Ruff Architects;
- Heritage Assessment prepared by Icen Projects;
- Daylight & Sunlight Report prepared by Rights of Light Consulting;
- Air Quality Assessment prepared by Entran;
- Noise Impact Assessment prepared by Sandy Brown Associates;
- Energy and Sustainability Report prepared by Pro Sustainability;
- Overheating Assessment prepared by Pro Sustainability;
- GLA Carbon Emissions Reporting Spreadsheet prepared by Pro Sustainability;
- BREEAM Pre-Assessment (Non-Domestic) prepared by Sustain Quality;
- Arboricultural Impact Assessment prepared by David Archer Associates;
- Basement Impact Assessment prepared by London Structures Lab;
- Flood Risk Assessment prepared by London Structures Lab; and
- Drainage Strategy prepared by London Structures Lab.

1.7 This statement should be read in conjunction with the above suite of documents.



2.0 The Site

- 2.1 The proposal site comprises a six storey building plus basement on the corner of Gray's Inn Road and Britannia Street. The basement, ground and first floors are in use as offices and the upper floors are residential with a mixed tenure.
- 2.2 The building does not accommodate its full plot and has the appearance of being set back from the historic building line of Britannia Street. This area is hard landscaped and has some planters but is otherwise underutilised, serving no specific purpose. At the eastern end of this area there is an electricity substation at basement level with a slightly raised podium above. This has a secure access to the basement running alongside and the area in front of the podium is in use informally as a bin store. The main commercial waste storage is however located at the front entrance to the commercial building.
- 2.3 The building shares a party wall with 344-354 Gray's Inn Road and 46-48 Britannia Street (Pioneer House) on either side, as well as part of 73 Wicklow Street to the rear, forming part of the southern section of a block bounded by Gray's Inn Road to the west, Britannia Street to the south, Wicklow Street to the east and St Chad's Place to the north.
- 2.4 The building is red brick and dates from the 1970's. It has a utilitarian appearance designed to sit alongside the more traditional architecture of 344-354 Gray's Inn Road. The site lies within Sub Area 4 of the Kings Cross Conservation Area where there are a number of listed buildings and buildings of merit. The proposal site is neither listed nor is it identified as making a positive contribution to the Conservation Area.
- 2.5 Gray's Inn Road is a busy thoroughfare which starts at the boundary of the City of London and ends at Kings Cross St Pancras Station. Although known as a hub for law and legal professions in London, this section of the road is characterised by predominantly commercial properties with some residential uses on upper floors. The secondary roads off Gray's Inn Road are quieter and are predominantly residential. The building immediately adjacent at 46-48 Britannia Street is a five storey residential block.



- 2.6 The site is located in Zone 2 and benefits from excellent transport links with a PTAL score of 6(b) which is the highest rating.

Planning History

- 2.7 The following planning history for the site is available on the planning register:
- 2010/6571/P Retrospective application for the installation of five air-handling units on rear wall of building (Class B1a) at first floor level – Granted 26/1/2011
 - CTP20926 - The formation of a 4th floor at roof level to provide office accommodation and erection of a 6-storey and basement side extension at the corner of Gray's Inn Road and Britannia Street to provide basement laundry room and residential storage, ground floor office and showroom, first floor offices and 4 floors of residential (comprising 12 units) above at 344-356 Gray's Inn Road, WC1. Approved 30/7/1975
- 2.8 It is understood that the 1975 record relates to the original building and there have been no significant applications at the site since.
- 2.9 Nevertheless, in 2017 a pre-application meeting was requested to discuss a proposal that is very similar to the proposal presented in this application.
- 2017/2942/PRE - Erection of a three storey (basement, ground and first floor) extension comprising two storeys of office accommodation and one storey of residential accommodation to provide an additional 220sqm of office floorspace and 279sqm (including and change of use) of residential.
- 2.10 The feedback from this pre-application was positive and formed the basis for developing the application proposals.
- 2.11 Since the pre-application meeting in 2017, the property has changed ownership and the new owners have assembled a new design team led by Paul Ruff Architects. The



design of the proposal has been amended in response to the client brief and pre-application advice, as well as having to respond to new design challenges arising from more detailed survey work.

3.0 Pre-Application

- 3.1 As described in the previous chapter, a pre-application proposal was submitted in 2017 for the “*Erection of a three storey (basement, ground and first floor) extension comprising two storeys of office accommodation and one storey of residential accommodation to provide an additional 220sqm of office floorspace and 279sqm (including and change of use) of residential*”.
- 3.2 The residential floorplate was cut away in the centre to provide sheltered amenity space for the flats and to allow daylight into the centre of the building. The design of the first-floor windows had a more vertical emphasis than the ground floor openings in order to differentiate from the ground floor use and to pick up the rhythm of the vertical windows on nearby buildings (Figure 1).

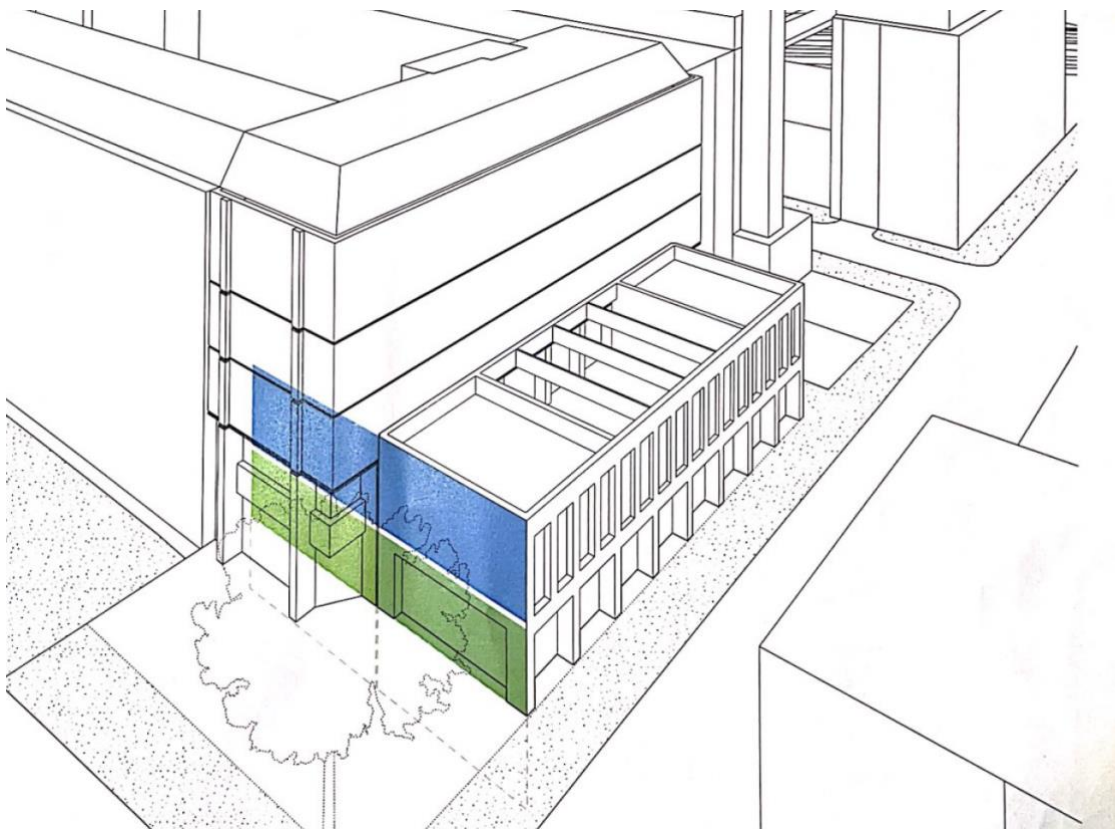


Figure 1 – Massing diagram illustrating commercial (green) and residential (blue) floorplate

- 3.3 The floor areas provided were approximate and an indication was given of the potential for three flats. The CGI at Figure 2 gives a general impression of the design approach.



Figure 2 – Artists impression of pre-application scheme

- 3.4 The Council's written response was broadly positive, with no objection in principle to the proposed extension (**Appendix 1**). However, some elements of the design were considered to need refining. The written response is therefore heavily focussed on design and can be summarised as follows:

Design

- The existing Building makes a considerate response to the urban block but compromises the urban grain through various aspects of its planning, including;
 - Pulling back from the pavement at Britannia Street;
 - Introducing a hard level change at Gray's Inn Road;



- Reorientating the building and presenting the flank to Gray's Inn Road and the main entrance on Britannia Street;
- Officers considered that the opportunity to correct some of these failures may justify major alterations to the building;
- The elevation on the Gray's Inn Road side of the building is considered to be the most modelled and interesting on the building despite being the flank elevation. The Britannia Street elevation, ground level landscaping and interface with the street are considered to offer least to the Conservation Area;
- The deeper recesses proposed at the ground floor are more successful than the first floor residential windows;
- The proposed massing works well in the context of the surrounding small 19th Century buildings on the junction, providing a step down from the larger buildings on Gray's Inn Road;
- The flat roofline is uncomfortable against some of the adjacent gables, dormers and hipped roofs of older buildings and concentrating the terrace in the centre of the building may be a missed opportunity for articulation;
- The amenity value of the terrace is also not convincing;
- The masonry grid and regularity of the façade does not follow the high solid to void form of the surrounding buildings in the Conservation Area;
- There was a lack of detail provided to explain the relationship with the existing elevation and how the proposed extension would interface with this given that the first floor windows would be elongated to below the existing brick apron;
- Retention of the mature tree at the corner of the site is necessary as it is under a TPO and an arboricultural report would be required at application stage;
- The relationship with the adjacent Pioneer House requires careful consideration as the proposal will mean that this becomes an exception to the consistent building line of Britannia Street;



- The proposed set back on the Gray's Inn Road frontage appears to be the right approach and is consistent with other small changes in building line in the Conservation Area;
- Publicly accessible open space around the building is welcomed but should not bleed into the highways and confuse the basic arrangement;

Land Use

- The proposal would provide new residential accommodation across the whole of the first floor thereby meeting the requirements of Policy H2 (Maximising the supply of self-contained housing for mixed use schemes) to provide 50% of all additional commercial floorspace as self contained housing;
- The proposal would be required to provide a commuted sum for affordable housing;
- The proposal for two and three beds is supported in accordance with Policy H6 (Housing Choice and Mix);

Basement

- The proposal would require a Basement Impact Assessment (BIA) to meet parts a-e of Policy A5 (Basements). As it is only one storey and less than 1.5 times the footprint of the existing building it would meet parts f-g. An approval in principle (AIP) may be required to be secured via S106.

Amenity

- The extension has been set back from 46 Britannia Street but appears to lie within the 45 degree angle of the neighbouring residential windows. A daylight sunlight assessment is required to demonstrate the impact;
- The upper floor windows of buildings on the opposite side of Britannia Street are only 14m away. Further detail is required of these uses but given the tight urban grain this may be acceptable;
- Access to the upper floors must be maintained during the development.



Future Occupiers

- The development could comfortably accommodate three units;
- An air quality assessment would be required with any application.

Sustainability

- The application should be accompanied by an Energy and Sustainability Statement.

Transport

- The proposal site is PTAL 6b and is within a CPZ. All new development should be car free, secured by S106;
- Cycle parking facilities should exceed the requirements of the London Plan;
- A Construction Management Plan will be required, following the Council's Pro-Forma.

3.5 The Council provided a list of the required documents to support a proposal, including:

- Application Forms and Fee
- Location Plan and Planning Drawings
- Design and Access Statement
- Planning Statement
- Energy/Sustainability Statement
- Air Quality Assessment
- Basement Impact Assessment
- Construction Management Plan Pro-Forma*
- Daylight/Sunlight Report
- Arboricultural Report

*The Camden CPG on Amenity clarifies that this should be submitted after planning permission is granted.



- 3.6 The applicant has sought to closely follow the advice set out at pre-application stage. Although there has been a passage of time and a new London Plan has been adopted, the relevant local Policy for Camden has not materially altered, having been adopted in July 2017.



4.0 Proposal

Overview

- 4.1 The proposal seeks planning permission for the basement, ground floor and first floor extension to 340 Gray's Inn Road.
- 4.2 The basement and ground floor will remain in commercial use (Class E), whilst the existing floor plate at first floor will change use to residential (Class C3). Taking into account that the existing basement is not usable, there will be an overall uplift in commercial floorspace and there will be an uplift of 5 new residential units at the site.

The Applicant and Design Team

- 4.3 The property was acquired by Grays Inn Properties Ltd in 2022 having identified an opportunity to develop the site in line with an earlier pre-application proposal. The applicant, CMT Design and Construction, will be the lead contractor and as such are able to advise on construction at an early stage in the process. CMT Design and Construction are part of the KNT Group of Companies.
- 4.4 The appointed architects are Ruff Architects <https://www.ruffarchitects.co.uk/> who have recently been shortlisted by Dezeen for "*Emerging architectural studio of the year*". The practice was established in 2014 by Paul Ruff, formerly of Stirling Prize winning AHMM Architects. The practice works across a variety of sectors and has experience of a wide range of complex and challenging schemes from high-end residential properties, to large masterplanning proposals, and residential and mixed use schemes.
- 4.5 The remainder of the design team are as follows:
- West Green Planning – Planning Consultant
 - London Structures Lab - Structural Engineer and Drainage Engineer
 - Zeta Services - Fire Engineer
 - Rights of Light Consulting - Daylight Sunlight



- Sandy Brown - Acoustic Engineer
- Entran - Air Quality Consultant
- Icení - Heritage Consultant
- Pro-Sustainability - Energy and Sustainability Consultant
- David Archer Associates - Arboriculturist

- 4.6 The professional team has advised throughout the design process to ensure that the proposals meet regulations and are in accordance with planning policy.
- 4.7 Ruff Architects and London Structures Lab were appointed at an early stage allowing the proposal to evolve to meet the technical challenges of the site.
- 4.8 The advice from officers provided at the pre-application stage has been used as the starting point of the design development process.

The Proposal

- 4.9 The proposal seeks to extend the basement, ground and first floor of the existing building to provide a total of 606sqm GIA commercial floorspace (Class E) and 449sqm GIA of residential floorspace (Class C3) consisting of 5no. self-contained flats.
- 4.10 The existing building has a subterranean substation which the operator has confirmed is no longer required and can be removed.
- 4.11 The extension is designed to be viewed as a “pavilion” that is separate but complimentary to the existing building. This affords the opportunity to provide more interesting architectural forms that take cues from the surrounding buildings to positively contribute to the character of the Conservation Area.
- 4.12 The commercial space on the ground floor will be provided as a large flexible use single unit with direct access from the street on both the Gray’s Inn Road and Britannia Street sides. The main entrance will re-establish the frontage of the original building onto Gray’s Inn Road by providing a double storey glazed frontage that will visually



link to the new extension and improve the daylight levels to the internal area. A second access will be provided on Britannia Street at the corner of the pavilion extension.

- 4.13 The commercial space at the basement will be separately accessed from Britannia Street at the opposite end of the pavilion. A secondary means of escape is provided onto Gray's Inn Road. The LV switch room and meter room for the block is located off within the basement and accessed from a communal residential corridor leading to the cycle store. This is accessible via elevator or stairs from the ground floor communal corridor.
- 4.14 The main entrances to the existing residential units will be moved from the centre of the Britannia Street elevation to the rear and will be shared with the new units. The proposed new bin store access adjacent to the communal access will provide a better solution for existing residents to the current arrangements. The proposed new residential use at the first floor will consist of five self-contained flats, as summarised in Table 1 below:

Unit Number	Size	Area (GIA)	Amenity Space
01	2B 3P	61m ²	8m ²
02	1B 2P	54m ²	9m ²
03	1B 2P	50m ²	9m ²
04	2B 4P	70m ²	12m ²
05	1B 2P	51m ²	4m ²

Table 1 – Residential Accommodation

- 4.15 The mix of units is in accordance with the highest level of demand for the borough of one and two bedroom flats.
- 4.16 The units all exceeds the minimum space standards set Nationally and in the London Plan, with all rooms meeting the technical standards and the layout adaptable and accessible in accordance with M4(2) of Building Regulations. The flats each have usable private amenity space in the form of balconies accessible from the main living area.



The balcony space for Flats 1-4 exceeds minimum space standards, whilst the space available for flat 5 is limited by needing to follow the design of the balcony spaces above. Whilst offering more space than all of the existing balconies, it falls just short of the 5sqm standard required. Nevertheless, in accordance with the advice in the Mayors Housing SPG, the additional 1sqm is provided internally to compensate.

- 4.17 All of the flats are dual aspect and will benefit from good levels of internal daylight due to having large south facing window openings. Shading from the loggia design will prevent overheating during summer. The internal daylight levels have been tested against BRE guidance and an overheating assessment demonstrates good comfort levels for future occupants.
- 4.18 The location of the site adjacent to the busy Gray's Inn Road will necessitate acoustically attenuated windows along with mechanical ventilation to allow them to be closed at night time. As Camden is an Air Quality Management Area, this will also assist with air filtering.
- 4.19 The units will meet the housing quality standards set out in the London Plan, Mayors Housing Guidance SPG and Camden CPG. Layout plans show an illustrative layout of furniture to demonstrate the usability of the space.
- 4.20 The constraints of the site have dictated the footprint, form and mass of the current proposal and the internal layouts. The design has been developed through various options to maximise the efficiency of the space.
- 4.21 The mature tree at the corner of Gray's Inn Road and Britannia Street is a significant constraint which has dictated the proposed set-back building line of the extension. However, this has also provided the opportunity to open up the corner with a new landscaped area of privately owned public space, following the removal of the boundary fencing currently in situ. This will make the building feel more open and provide a secondary aspect to Unit 1 within the existing building.



- 4.22 As stated earlier, the design of the proposal seeks to follow the style of a pavilion which is separate but complimentary to the existing building. A shadow gap will provide a visual separation between the extension and the existing building and distinctive architectural features, such as the large archway openings, will give the new extension character and ensure that it contributes in a positive manner to the Conservation Area.
- 4.23 The datum lines of the floors and balustrades of the extension will follow through to the existing building and there will be a continuation of glazing and materiality across the ground and first floors, ensuring that the design remains consistent and the two separate elements are complimentary to one another.
- 4.24 A context study has informed the design and the arched profile has been identified as a dominant feature of the area. The materials palette has similarly been chosen to reflect the surrounding context, with varied shades of brick and stone columns dominant. The balustrade detail and metal reveals are a high quality design detail that can be carried through to enhance the frontage of the existing building.
- 4.25 The proposal has been developed following the principles of sustainable design and a fabric first approach to energy efficiency, with low carbon technology (Air Source Heat Pumps and Solar PV) to supplement the energy requirements of the development.
- 4.26 Various sustainable urban drainage solutions have been considered for the site, with the accompanying drainage strategy following the drainage hierarchy and recommending underground storage to limit the discharge to 2 litres per second, significantly improving the existing rate.
- 4.27 The site does not benefit from off-street parking and there is no on-street parking available nearby. As such the proposal will be car free, which is generally encouraged in PTAL 6b. Secure cycle storage is provided in line with London Plan standards, with the 9 spaces in the basement accessible to residents via lift or stairs and 4 spaces available for visitor use on the forecourt. Staff cycle parking for the commercial units



will be provided as part of the internal fit outs once the tenant is agreed and the requirement is known.

- 4.28 Servicing will take place from Britannia Street with easy access to the bin store adjacent to the residential entrance via a 1.15 gradient ramp. The refuse area has been sized to accommodate both the commercial and residential waste, providing a much improved solution to the existing arrangement of having large euro bins on the street at all times.
- 4.29 The Design and Access statement contains a detailed walk through of the design development process and final design.



2.0 Planning Policy Summary

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that the determination of an application *“must be made in accordance with the [development] plan unless material considerations indicate otherwise”*.
- 2.2 The Development Plan for the area consists of the London Plan (2021) and Camden Local Plan (2017) and Policies Map. Work has started on the review of the Local Plan but is in its early stages.
- 2.3 In accordance with the proposals map, the site is within the Central London Area and within the Kings Cross Conservation Area as well as being within a viewing corridor.
- 2.4 In addition to the Development Plan, the Policy and Guidance Documents most relevant to the assessment of this proposal are as follows:
- National Planning Policy Framework (NPPF)
 - National Planning Practice Guidance (NPPG)
 - National Design Guide (NDG)
 - Nationally Described Space Standards (NDSS)
 - Mayors Housing SPG
 - Mayors Sustainable Design and Construction SPD
 - Camden Design SPG (CPG 1)
 - Waste Storage Technical Guidance
 - Camden Basement CPG
 - Camden Transport CPG
 - Camden Access for all CPG
 - Camden Energy Efficiency and Adaptation CPG
 - Water and Flooding CPG
 - Kings Cross/St Pancras Conservation Area Appraisal



- 2.5 Each of these documents is summarised below in so far as relevant to the development proposals.

National Policy

- 2.6 The London Plan and Camden Local Plan have been prepared within the overarching National Planning Policy Framework which includes a presumption in favour of sustainable development. The NPPF requires Planning policies and decisions to promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment.
- 2.7 The most recent update to the NPPF and associated guidance made amendments to Chapter 12 to place a greater focus on Design and to introduce the National Design Guide and National Model Design Code. Authorities are expected to prepare design guides or codes consistent with the principles set out in these documents, to reflect local character. Design quality should be considered throughout the evolution and assessment of individual proposals.
- 2.8 In 2015 technical standards were introduced to ensure that all residential development met minimum space standards. The Nationally Described Space Standard applies to all development.

London-wide Policy

- 2.9 The London Plan was adopted in 2021 and therefore post-dates the pre-application advice. The proposal is not of a scale that is referable to the Mayor but nevertheless the following policies of the revised plan are considered relevant as follows:
- **GG2 Making the best use of land**, prioritising brownfield sites that are well connected to public transport and applying a design-led approach to determine the optimum capacity of sites.
 - **GG4 Delivering the homes Londoners need**, ensuring more homes are delivered and creating mixed inclusive communities with good quality homes and high standards of design.



- **GG5 Growing a good economy**, planning for sufficient employment space in the right locations
- **D3 Optimising site capacity through the design-led approach**, ensuring that all development makes the best use of land by responding to the site context, considering various design options. This includes responding to local distinctiveness through layout, orientation, scale, appearance and shape, with due regards to the existing streetscene. Providing active frontages, delivering appropriate outlook, privacy and amenity, mitigating impacts of noise and poor air quality, and achieving good internal and external environments. Buildings should be of high quality and aim for high sustainability standards taking into account the principles of the circular economy.
- **D4 Delivering Good Design**, with Design and Access Statements demonstrating compliance with the design requirements of the London Plan and development proposals thoroughly scrutinised.
- **D5 Inclusive Design**, requiring the highest standards of accessible and inclusive design and Design and Access Statements to include an inclusive design statement.
- **D6 Housing Quality and Standards**, requiring minimum technical standards to be exceeded and qualitative design aspects to be met.
- **D8 Public Realm**, which encourages opportunities to create new public realm.
- **D11 Safety, security and resilience to emergency**, requiring proposals to take account of potential physical risks (e.g. fire, flood, crime, terrorism) early in the design process to ensure that they are aesthetically integrated.
- **D12 Fire Safety** which requires all development to consider fire safety at the planning stage.
- **D14 Noise**, mitigating the potential adverse effects of noise within the new development.



- **H2 Small Sites**, which pro-actively supports the delivery of well designed new homes on small sites under 0.25ha, presenting a minimum target for Camden of 328 units per year on such sites.
- **H10 Housing Size Mix**, which requires development to have a mix of unit sizes to meet housing need.
- **E1 Offices**, which supports improvements to the quality, flexibility and adaptability of office space through new office provision and refurbishment.
- **E2 Providing suitable business space**, which supports the provision of B use classes
- **HC1 Heritage Conservation and Growth**, which seeks to conserve the significance of heritage assets and is relevant in the context of the Conservation Area and nearby listed buildings.
- **SI1 Improving Air Quality**, which requires development to be at least air quality neutral.
- **SI4 Managing Heat Risk**, which requires development proposals to minimise the adverse impact of the urban heat island effect and to manage heat within buildings.
- **SI5 Water Infrastructure**, which requires BREEAM Excellent standard for water consumption on commercial developments and to use planning conditions to achieve 105 litres per person per day.
- **SI13 Sustainable Drainage**, which requires development proposals to aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible, resisting impermeable surfaces unless shown to be unavoidable.
- **T5 Cycling**, which requires cycle parking in line with the standards in Table 10.2.
- **T6 Car Parking**, which places car free development as the starting point for all development proposals.



- **T7 Deliveries, servicing and construction**, which requires the facilitation of safe, clean and efficient deliveries and servicing.

2.10 The Mayors **Housing SPG** pre-dates the London Plan but nevertheless provides additional guidance to Policy D6, introducing a number of housing quality standards to be adhered to.

2.11 The Mayors **Sustainable Design and Construction SPG** provides guidance on what measures developers can include in their building designs and operations to achieve the carbon dioxide and water consumption targets set out in the London Plan.

Local Plan

2.12 The following policies in the Local Plan have been identified as being of particular relevance to the proposal:

- **H1 Maximising Housing Supply**, which aims to exceed the target of 11,130 self contained homes over the plan period.
- **H2 Maximising the supply of self-contained housing from mixed use schemes**, which sets a requirement for at least 50% of all additional floorspace on mixed use schemes in the Central London Area to be self contained housing.
- **H4 Maximising the supply of affordable housing**, which expects a contribution to affordable housing from all residential development over 100sqm GIA. A sliding scale is applied that requires 2% affordable housing provision for a single unit, increasing by 2% for any additional unit. Where the development has capacity for few than ten units the Council will accept a payment-in-lieu of affordable housing.
- **H6 Housing Choice and Mix**, which seeks accessible homes in all developments which meet the nationally described space standard and are accessible and adaptable in accordance with Building Regulation M4(2). Although the policy requires 10% of dwellings to be M4(3) wheelchair



adaptable, in accordance with paragraph 3.153 this is not required on developments of five dwellings or fewer.

- **H7 Large and Small Homes**, requires that developments include a mix of homes and includes a dwelling size priorities table that states a high requirement for two bed properties.
- **E1 Economic Development and E2 Employment Premises and Sites** support the development of office space in Central London areas and the provision of premises that are suitable for a wide variety of business activities.
- **A1 Managing the Impact of Development** seeks to protect the amenity of communities, occupiers and neighbours and requires detailed consideration of the impacts of development on all aspects of amenity.
- **A3 Biodiversity** which seeks to resist the loss of trees that provide amenity value.
- **A4 Noise and Vibration** requiring development in high noise environments to provide appropriate mitigation.
- **A5 Basements** which states that basement development will only be permitted where it will not cause harm to neighbours, heritage assets, ground conditions, the character of a building and area. The policy requires a Basement Impact Assessment and where appropriate a Basement Construction Plan to assess impact on drainage, groundwater conditions and structural stability. Basements should not comprise more than one storey or be built under an existing basement and should not be more than 1.5 times the footprint of the host building. They should also avoid the loss of trees of townscape value. New lightwells should be discrete and not harm the architectural character of the building.
- **D1 Design**, which applies to all development and seeks to secure high quality design that respects local context, is inclusive for all and is sustainable in design and construction.



- **D2 Heritage**, requiring that development in conservation areas preserves or enhances the area and development close to listed buildings avoids harm to their significance.
- **CC1 Climate Change Mitigation** requiring all developments to reduce carbon emissions through following the energy hierarchy.
- **CC2 Adapting for Climate Change** requiring all development of 5 units or more to provide a Sustainability Statement demonstrating appropriate measures to adapt to climate change. Conversions and extensions of over 500sqm of non-domestic floorspace are expected to achieve an “Excellent” BREEAM rating.
- **CC3 Water and Flooding** which seeks to ensure that development does not increase flood risk and incorporates Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy.
- **CC4 Air Quality** which requires Air Quality Assessments where development may expose residents to high levels of air pollution, in this case from the roads.
- **T1 Prioritising Walking, cycling and public transport** which requires development to provide accessible, secure cycle parking facilities in line with the London Plan and meeting the design requirements of the Transport CPG.
- **T2 Parking and Car Free Development** which requires all new developments in the borough to be car free (i.e. no new issue of on-street parking permits).
- **DM1 Delivery and Monitoring** supporting the use of planning contributions where appropriate.

Supplementary Planning Guidance

2.13 The Council has produced a series of guidance documents intended to supplement the Local Plan.

- Camden Design SPG (CPG 1)



- Waste Storage Technical Guidance
- Camden Basement CPG
- Camden Transport CPG
- Camden Access for all CPG
- Camden Energy Efficiency and Adaptation CPG
- Water and Flooding CPG

- 2.14 The **Camden Design Guide** covers a range of topics such as housing, sustainability, amenity and planning obligations. It includes advice on design excellence, heritage and alterations and extensions to non-residential properties.
- 2.15 The **Waste Storage guidance** not only contains detail on the amount of storage required, but also the distances that are acceptable for collection and the required standards for the bin stores.
- 2.16 The **Basement CPG** provides detailed guidance on basement size and design and the preparation of Basement Impact Assessments.
- 2.17 The **Transport CPG** provides additional guidance on car free developments and on cycle storage requirements.
- 2.18 The **Access for all CPG** provides detailed guidance on what to include in the access chapter of a Design and Access Statement.
- 2.19 The **Camden Energy Efficiency and Adaptation CPG** provides additional guidance to support the Climate Change Adaption and Mitigation policies in the Local Plan.
- 2.20 The **Water and Flooding CPG** provides additional guidance on ensuring that all developments are water efficient and residential developments meet the requirement of 110 litres per person per day. Refurbishments and other non-domestic development will be expected to meet BREEAM water efficiency credits. The CPG provides guidance on meeting this.



Conservation Area Appraisal

- 2.21 The site is within the Kings Cross Conservation Area sub-area 4. An extract from the Conservation Area appraisal is copied below where it refers to the application site (bold) and surroundings:

*“Pioneer House, at nos. 344-348 Gray's Inn Road is a four-storey Edwardian office building with a recent mansard addition. The building is constructed of red brick with buff stone banding at 1st and 2nd floors, and has timber sash windows. Its façade has a shallowly projecting central entrance bay with stucco rustication at ground floor level, an arched stone entrance which is surmounted by cast iron balconies at first to third floor level and an arched pediment at roof level. It has modern shopfronts inserted at ground floor level on either side of the central entrance bay which relate poorly to the existing building in terms of detailing and materials. **This building is adjoined to the south by no. 340 Gray's Inn Road, which is a six-storey, red brick building of mid to late 20th century origin. Its main elevation fronts Britannia Street and the flank elevation to Gray's Inn Road. The frontage consists of unadorned red brickwork and a double height ground floor retail unit. The building's design seeks to continue the scale and proportion of the adjacent building**”.*

“On the northern side of the street, at the junction with Gray's Inn Road, the building at nos. 48-50 Britannia Street (also no. 342 Gray's Inn Road) is a five-storey red brick property of late 20th century date. The office building has large windows, recessed balconies and double height retail units at ground floor level. The adjoining building to the east, also set back from the Britannia Street building line is no. 46 Britannia Street, which is the flank elevation to a four-storey mid 20th century building fronting Wicklow Street. On the southern side of Britannia Street, nos. 39 and 37 are three-storey buildings of similar date and form to the adjoining buildings at nos 334-336 Gray's Inn Road. They have white painted façades and prominent red



shutters. To the east, no. 75 Wicklow Street is a mock gothic building which was constructed in 1872 and formerly housed the Church School of St John. It is constructed of stock brick with red brick banding and stone dressings and has a steeply pitched slate roof. It is listed at Grade II. All of the buildings on the north side of Britannia Street to the east of the junction with Wicklow Street are set back from the street which deviates from the sense of enclosure which is characteristic of the area between Gray's Inn Road and King's Cross Road”

- 2.22 The appraisal does not identify the site as having any particular merit or making a positive contribution to the Conservation Area.



4.0 Planning Assessment

4.1 The key planning considerations are considered as follows:

- Principle of development
- Design
- Heritage
- Quality of Accommodation (inc access)
- Housing Mix
- Affordable Housing
- Neighbouring Amenity
- Basement
- Energy and Sustainability
- Arboriculture
- Drainage
- Waste and Recycling
- Parking
- Air Quality
- Planning Obligations

4.2 These matters are addressed in turn below:

Principle of development

4.30 The principle of extending the building at basement, ground and first floor level for a mixed commercial and residential use was supported at pre-application stage (**Appendix 1**). The site is located in a Central London Area where office development is appropriate and high-density residential development is supported due to the high levels of public transport accessibility.

4.31 Furthermore, Policy H2 of the Camden Local Plan requires that commercial developments involving more than 200sqm (GIA) of additional floorspace provide at



least 50% of additional floorspace as self-contained housing in the Central London Area.

- 4.32 The proposal site is unused brownfield land and is not allocated on the proposals map. The 2021 London Plan introduced a greater focus on the delivery of small sites and the importance of small to medium sized developers in helping to meet housing demand. The Plan states that incremental intensification of existing residential areas within PTALs 3-6 (or within 800m distance of a station or town centre boundary) is expected to play an important role in contributing towards the housing targets for small sites. When assessing the benefits of additional housing provision, the Mayor requires boroughs to recognise that schemes that provide relatively low numbers of new homes play an important cumulative role in helping to deliver housing targets alongside larger developments, subject to the scheme in question making the most efficient use of land.
- 4.33 The London Plan has also introduced a new target for the delivering of housing on small sites, with Camden expected to provide 3280 homes on sites under 0.25ha over the plan period (328 per annum). Camden Policy H1 seeks to exceed its housing targets. The additional policy support for the development of small sites was required as it is widely recognised that they tend to be more challenging to develop, given the constraints of surrounding development and the strict design requirements that new residential development must comply with.

Design

- 4.34 The design of the proposal has been developed through a series of stages starting with the principles of bulk and mass established at the pre-application stage by the previous project architect. The pre-application written response recognised that the existing building has design flaws which have the potential to be rectified through a substantial refurbishment and extension.
- 4.35 Supported by advice on Heritage and Townscape from Icen Projects, Paul Ruff Architects undertook a local context study to inform the direction of the design.



Recognising that the host building is not of any particular historic or architectural merit, the standard approach of matching materials and subordinate design was not considered to be appropriate to the profile and prominence of the site. As such, a complimentary but architecturally different “pavilion” extension design was followed, using reference to architectural features from the local built environment.

- 4.36 The Camden Design Guide includes a section on extensions and alterations which notes that in schemes involving comprehensive refurbishment work, there may provide be an opportunity to consider the use of alternative materials, provided that they preserve the architectural character and quality of the building or streetscape.
- 4.37 The proposals will respect the datum lines of the host building, aligning floor levels and windows whilst using a shadow gap to signify the change from old to new. The materials pallet for the new extension been chosen to reflect the surrounding context, with varied shades of brick and the use of stone columns. The balustrade detail and metal reveals are a high quality design detail that will be carried across to the host building to enhance the frontage and provide consistency of design.
- 4.38 Internally, the extension directly connects to the existing commercial space, opening it up to a flexible open plan area at ground floor, whilst bringing the existing basement space into active use and tidying up the building services. The oversized electricity substation will be consolidated to a small switch room and waste storage and cycle storage can be provided for the new residential units and the existing units, improving a substandard existing arrangement.
- 4.39 The building entrances have been reconsidered to restore the main frontage to Gray’s Inn Road, in accordance with pre-application guidance. The residential entrance will be relocated to the rear from the centre of the block which will improve internal efficiencies of the building and benefit the existing residents, by upgrading the communal areas with new entry system and providing a conveniently located and enclosed bin store.



- 4.40 The design and access statement by Paul Ruff Architects provides a comprehensive guide through the design process. Overall, the proposal seeks to optimise the use of the site by responding to the site context and local distinctiveness, in accordance with Policy D3 of the London Plan.

Heritage

- 4.41 The proposal site is located within the Kings Cross Conservation Area sub area 4. The Conservation Area Appraisal identifies the property as a neutral feature in the CA and the Heritage Assessment prepared by Icení notes there to be scope for enhancement. The adjacent building to the north, Pioneer house, is considered to be a positive feature. The nearest heritage asset affected is the Grade II listed building at 75 Wicklow Street, which was the Church School of St Judes (now demolished) and is now in use for offices and storage.
- 4.42 In accordance with the NPPF Chapter 16, applicants are required to describe the significance of any heritage assets affected, including any contribution made by their setting. Icení Projects have undertaken a baseline study of Heritage and Townscape, which identifies and describes the various assets in the area, and provides a detailed background of the history of the site and surrounding which has helped to inform the design from the outset.
- 4.43 The buildings that had occupied the site in the 19th Century and earlier were likely a mixture of business and residential. There is evidence of a Campbell Tile Co being registered at 340 Gray's Inn Road toward the end of the century. In the early 20th Century the site was occupied by an artists studio, but endured significant bomb damage during WW2. The building was demolished shortly after the war, and the current building was constructed sometime after 1970. The building was designed as a continuation to the frontage of Pioneer House 344-354 Gray's Inn Road, which is considered to be a building of merit, and as such a Non-Designated Heritage Asset (NDHA).



- 4.44 The historical interest of this building is as a well-preserved example of purpose-built Edwardian offices. It informs present understanding on how the area around Kings Cross was identified as a commercial part of London during the Edwardian period and the increased need for office space. However, the modern inserted shopfronts found at ground floor level are at odds with the building's appearance and dilute the historical interest. The proposal site makes no contribution to setting.
- 4.45 The significance of the Grade II listed building at 75 Wicklow Street is found in its historic interest as a building that informs upon the educational role of the Church of England in the late 19th century. There is limited architectural interest found in the building's ability to inform upon late 19th century Queen Anne revival style and the adoption of stone dress mullion and transom window. The contribution the Site makes to the heritage asset is neither positive or negative and limited to the fact that it is a neutral contributor to the townscape and is set back from the road. This listing notice identifies its round arched doorways and windows, which is a repeated feature of the Conservation Area and has been referenced within the proposed design.
- 4.46 Sub Area 4 of the Kings Cross Conservation Area holds significance in its ability to portray the 19th century character of the wider area. The proposal develops a vacant area of land and will reference the historic architecture through its design, taking the opportunity to enhance the setting of the Conservation Area.
- 4.3 In accordance with the findings of the Heritage Assessment undertaken by Iceni Projects, it is considered that the proposal will preserve the historical and architectural interest of the area, with high quality architectural response making a positive contribution to the townscape. There would be no harm to the significance of designated and non-designated heritage assets, in line with paragraphs 199-204 of the NPPF. In accordance with Policy HC1 of the London Plan and D2 of the Camden Local Plan the proposal will preserve historical assets and enhance the area.



Quality of Accommodation (including access)

- 4.47 The proposal has been designed to meet the quality standards of the Mayors Housing SPG and meets minimum space standards set Nationally and in London Plan Policy D6. Internal layouts are shown on the plans to demonstrate the liveability of the units.
- 4.48 Each flat has a shaded south facing balcony that provides private amenity space in line with standards (i.e. 5sqm per 1-2 person unit and 1sqm per additional occupant). The flats all benefit from a south facing aspect with direct sunlight into all habitable rooms. Four of the five units are dual aspect, despite the tight geometry of the extension.
- 4.49 The five flats are arranged around the existing core serving the existing units above and although this means an internal corridor, daylight can be brought in from above.
- 4.50 The Design and Access Statement includes an Inclusive Design statement in line with London Plan policy D5. The design approach ensured inclusive design was incorporated from the outset. All flats have step-free access, and the public realm has been designed to be open and inclusive.
- 4.51 Entrances meet requirements under the Equalities Act 2010. The proposed landscaping has been designed to create clear and legible pedestrian routes with level surfaces and appropriate ramped access where required, and the ground floor entrances will all be able to be accessed from a wide range of users since they will have a level threshold to the external level.
- 4.52 All new flats will be M4(2) 'accessible and adaptable dwellings' (London Plan Policy D7) and are accessible via a lift. It is not a requirement to provide M4(3) (wheelchair adaptable dwellings) on development proposals of five units. All common spaces to the building are designed to meet Building Regulations Part M, Volume 1 (2015) Category 2 Standards.



Housing Mix

- 4.53 The proposal provides a mix of one and two bedroom units appropriate for a flatted development in this central London location. Camden Local Plan Policy H7 (Large and Small Homes) states that the Council will aim to secure a range of homes of different sizes and recognises that there is a demand for all types of units. The policy takes a flexible approach to assessment having regard to evidence of local need and the character of the development and area. According to the development priorities table, there is a lower requirement for one bed units and a high requirement for two bed and three bed units. However, given that there is a need for all types of unit, the character of the site lends itself to a mix of smaller types of unit.

Affordable Housing

- 4.54 As only five units are proposed, the proposal is not required to provide affordable housing under the threshold approach in the London Plan. Nevertheless, in accordance with Policy H4 of the Camden Local Plan, a contribution to affordable housing is expected from all developments that provide one or more additional homes.
- 4.55 The requirement is for 2% for one home and increasing by 2% of for each home added to capacity (calculated based on GIA). As the development proposal is for under ten units, this can be provided as a payment-in-lieu. This will form part of an accompanying Section 106.

Neighbouring Amenity

- 4.56 The proposal has been designed to respond to the site constraints and respect the amenity of neighbouring residents. The nearest residential windows are on the opposite side of Britannia Street and at Pioneer House (46 Britannia Street) located to the rear of the property. The footprint of the proposed building has been designed to step away from Pioneer House to maximise outlook and minimise the impact on daylight and sunlight from these windows. As the historic building line is being restored and there is an existing street between the properties opposite, there is considered to



be ample separation distance with the windows opposite, in accordance with the CPG on Amenity (paragraph 2.5). For example, a similar historic relationship exists at Derby Lodge, a Grade II listed property on Britannia Street.

- 4.57 A daylight and sunlight analysis has been undertaken to consider the impact of the development on the light receivable by all of the surrounding properties. All neighbouring windows (that have a requirement for daylight or sunlight) pass the relevant BRE diffuse daylight and direct sunlight tests. The development also passes the BRE overshadowing to gardens and open spaces test. In summary, the proposed development will have a low impact on the light receivable by its neighbouring properties.
- 4.58 The proposal will not materially alter the use of the site and although new floorspace is created, the intensity of the use will not change to a degree that would cause disturbance for neighbours. The primary concern would be disruption during construction activities. As such, in accordance with Camden Policy, a Construction Management Plan will be secured by S106.

Basement

- 4.59 The existing basement contains plant rooms, storage and an electricity substation which is no longer required. The proposal seeks to extend and expand the space to make it usable for commercial purposes and to support building services. Support for the principle of a basement extension of this size was provided at pre-application stage.
- 4.60 Local Plan Policy A5 (Basements) states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal will not cause harm to neighbouring properties or the structural, ground, or water conditions of the area.
- 4.61 The Basement Impact Assessment (BIA) submitted alongside this application addresses these matters in detail.



- 4.62 The underlying geology of the site is London Clay, so the risk of movement and damage to this development due to heave of the clay has been considered in the design of the new basement slab and the piled foundation system. As part of the BIA, a Ground Movement Assessment has concluded that ground movements caused by the excavation and construction of the proposed development will be 7mm. The Damage Impact to surrounding structures within the zone of influence has been assessed as Category one in accordance with the Burland Scale. As such neighbouring properties will not be impacted.
- 4.63 There are no hydrological features of significance. The site is located in Flood Zone 1 and therefore not affected by fluvial flooding, and LB Camden GHHS Figure 8 indicates the site is not within a groundwater source protection zone. The BIA concludes that there are no impacts to the wider hydrogeological environment and there is low risk of surface water/sewer flooding.
- 4.64 Policy A5 also requires that the siting and scale of the basement must be subordinate to the host building and property, setting out a number of parameters for this at parts f-m. These criteria are largely directed towards residential basements in gardens and paragraph 6.133 of the policy notes that there will be exceptions for large schemes in commercial settings. The proposal meets the requirement of only being just one storey and would be expanding an existing basement underneath an expanded building footprint. The basement would also be set back from neighbouring property boundaries and would avoid the loss of trees of townscape value. As such it broadly meets the requirements set out in the policy and has been previously supported by officers at pre-application stage.
- 4.65 The policy and CPG also contains guidance on lightwells, commenting that where they are not part of the character of the street they need to be discreet or hidden, and within the highway they should be covered so they don't cause obstruction. The proposal has respond to this and there are no lightwells visible from the street.



Energy and Sustainability

- 4.66 Camden's Energy Efficiency and Adaptation CGP (2021) provides guidance on the target requirements for energy reduction for the domestic and non-domestic elements of the scheme. The guidance relates to the 2013 Part L baseline for building regulations, but in accordance with the requirements of the London Plan, the scheme must be assessed against the 2021 Part L baseline. It should be noted that this includes a 30% uplift in standards from 2013, thereby setting a far more challenging requirement if applied to the CPG.
- 4.67 The CPG target requirement is to achieve the greatest possible reduction in Carbon, with a 20% Carbon reduction from onsite renewables for the commercial element.
- 4.68 The Energy Report prepared by Pro Sustainability details how the requirements will be met, following the Energy Hierarchy of be lean, be clean, be green.
- 4.69 The building aims to be lean through energy efficiency measures including refurbishing the existing building fabric and improving thermal efficiency for all new walls, roofs and openings. The building design maximises daylight into the space to reduce energy requirements during the day and low energy fixtures and fittings will be used throughout. In assessing the options for clean energy, there is no potential to join an established heat network. All options have been considered for green energy and for the residential element Air Source Heat Pumps (ASHPs) are the only viable option, achieving a 53% reduction. For the commercial element, Solar PV on the roof of the new extension will provide a 28% reduction to meet the CPG requirements. The overall reductions are 64% for the residential and 32% for the commercial.
- 4.70 Based on the Sustainable design and construction requirements, the proposal will incorporate measures to reduce water consumption, reduce waste, use sustainable materials and use passive design to reduce the risk of overheating. As the proposal is south facing it is at greater risk of overheating and therefore a separate Overheating Assessment has taken place. This demonstrates that all units will meet the TM59/Part O criteria for the DSY1 scenario provided that units 1-4 are mechanically ventilated,



which is due to the need to potentially close windows at night because of noise. In making this recommendation, the cooling hierarchy has been followed with passive measures taken such as improved fabric, low g-value glazing, medium thermal mass, openable windows and external shading elements (e.g. glazing behind recessed balconies). Additional testing has been undertaken to consider risk of overheating in extreme weather circumstances, with additional mitigation proposed for the future if required.

- 4.71 Alongside the Energy and Sustainability Statement, a BREEAM Pre-assessment has been carried out for the commercial space. In accordance with Policy CC2 of the Local Plan, Conversions and extensions of over 500sqm of non-domestic floorspace are expected to achieve an “Excellent” BREEAM rating. Whilst it is noted that this is also encouraged for residential accommodation, given the challenges of the site, this would not be possible in this location and is not a policy requirement.
- 4.72 The proposal will provide substantial carbon savings, meeting the challenge of improving the energy performance of an existing building and introducing sustainability measures that will meet the objectives of Policy CC2 and follow the guidance in the Energy Efficiency and Adaptation CPG, and the Mayor’s Sustainable Design and Construction SPG.

Arboriculture

- 4.73 There is a large (19m high) London Plane tree located just outside the site boundary at the corner of Gray’s Inn Road and Britannia Street which forms part of a row of mature plane trees subject to a blanket Tree Preservation Order by virtue of being within the Conservation Area. The tree has been surveyed and has been considered throughout the design process to ensure its protection. David Archer Associates have indicated a root protection area and provided an Arboricultural Method Statement to guide future works. No pruning or felling of the tree is required to undertake construction.



Drainage and Flood Risk

- 4.74 The application is accompanied by a Flood Risk Assessment and Surface Water Drainage Strategy, which feed into the Basement Impact Assessment. The site is within Flood Zone 1 and therefore at low risk of fluvial flooding. EA mapping has determined there to be low risk from surface water (pluvial), groundwater, sewers or reservoirs and canals.
- 4.75 The existing site is 532sqm and is currently 100% impermeable. The site currently drains via the existing drainage arrangements which connects to the combined sewer located underneath the building footprint. The extension will cover an existing area of hardstanding and will also be impermeable, meaning that there will be no change from the existing situation. The site has been identified as being at low risk of flooding and therefore there is no mitigation required from a flood risk perspective. However, the drainage hierarchy has been applied in investigating an appropriate solution for sustainable urban drainage.
- 4.76 Due largely to the constraints of the site, there are few options available and the most appropriate solution is tanking underneath the site and controlling the discharge flow to 2 litres per second. The attenuation will provide storage for all rainfall events up to and including 1 in 100 year events plus 40% climate change.
- 4.77 The Camden SUDS proforma has been completed and accompanies the application. This should be sent direct to the LLFA.

Waste and Recycling

- 4.78 The proposal has been designed to meet the requirements set out in Camden Planning Guidance (Section 8).
- 4.79 Servicing will take place from Britannia Street with easy access to the bin store adjacent to the residential entrance via a 1:15 gradient ramp. Waste collection crews will not have to move wheeled bins more than 10m. The refuse area has been sized to accommodate both the commercial and residential waste, providing a much improved



solution to the existing arrangement of having large Euro bins on the street at all times. The residential units have access to the bin store via the lift or stair core.

Parking

- 4.80 All new commercial and residential development across the Borough is required to be car free, other than for essential users (i.e. disabled parking). The London Plan only requires disabled parking provision for schemes over ten units. There is also already one on-street disabled parking space on Britannia Street outside Pioneer House (46-48 Britannia St). As the development will be car free there will be no requirement for EV spaces.
- 4.81 The cycle parking provision is in accordance with London Plan standards, with nine spaces provided in the basement for the new residential units. The secure spaces will be accessible via the lift or stairs. It is recognised that it is not preferred to have cycle parking within the basement but in this particular instance it is considered to be justified due to the constraints of the site and requirement to separate the uses. Furthermore, the access to a lift ensures that users will not need to carry bicycles up a flight of stairs.
- 4.82 Visitor spaces are provided at the entrance to the commercial unit on Gray's Inn Road. Staff cycle parking provision and support facilities will be provided within the new commercial units and will be specified by the tenants. This can be secured via condition.

Air Quality

- 4.83 The whole of the London Borough of Camden is designated as an Air Quality Management Area (AQMA). In accordance with Policy CC4 of the Local Plan, Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution (e.g. new residential development in locations of poor air quality). Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and



include appropriate mitigation measures to be secured in a Construction Management Plan.

- 4.84 The AQA prepared by Entran assesses both construction and operational impacts of the Proposed Development. There is no significant traffic associated with the Proposed Development, therefore the impact of existing traffic has been considered with respect to the suitability of the Site for residential use only.
- 4.85 In order to reduce exposure of future residents to annual mean NO₂ concentrations, it is recommended that mechanical ventilation should be provided, with the air intakes situated on the top of the building away from the adjacent roads. The plans have specified an area for plant towards the back of the new building away from the main source of pollutants of Gray's Inn Road.
- 4.86 The assessment of construction impacts has shown that for the Proposed Development, limited releases of dust and particulate matter are likely to be generated from on-site activities. However, through good site practice and the implementation of suitable mitigation measures, the impact of dust and particulate matter releases may be effectively mitigated and the resultant impacts are considered to be negligible. These measures will be secured within the Construction Management Plan.

Developer Contributions and Planning Obligations

- 4.87 Camden Council collects 2 types of Community Infrastructure Levy: the Mayoral CIL and the Camden CIL. The Mayors CIL (MCIL2) was adopted in January 2019 and the Camden Community Infrastructure Levy Charging Schedule was adopted on 30th October 2020.
- 4.88 Accordingly, a charge of £80 per sq meter will be payable to the GLA and a charge of £644 per square meter for residential development (below 10 units), and £110 per square meter for office development, will be payable to Camden. The end user of the



“Class E” commercial unit may mean that a different charge is applicable at the time of implementation. All costs are index linked.

- 4.89 The provision of affordable housing currently lies outside of the remit of CIL and continues to be secured through planning obligations. The proposals do not include any on site affordable housing and as such an off-site contribution will be required to be secured via Section 106.
- 4.90 The Section 106 will also be used secure the Construction Management Plan and Car Free Development.



5.0 Conclusion

5.1 The application seeks full planning permission for the:

“Change of use of first floor of office building to residential use and erection of a three storey (basement, ground and first floor) extension comprising two storeys of office accommodation and one storey of residential accommodation incorporating five self-contained flats”

5.2 The principle of extending the building at basement, ground and first floor level for a mixed commercial and residential use has been supported at pre-application stage subject to further consideration of the design.

5.3 The design of the proposal has been developed through a series of stages starting with the principles of bulk and mass established at the pre-application stage by the previous project architect, and considering all of the other identified constraints of the site, technical standards, and planning policy requirements, before developing the approach towards the façade treatment.

5.4 Supported by advice on Heritage and Townscape from Icení Projects, Paul Ruff Architects have undertaken a local context study to inform the direction of the design and recognising that the host building is not of any particular historic or architectural merit, the standard approach of matching materials and subordinate design was not considered to be appropriate to the profile and prominence of the site. The “pavilion” approach to the extension references architectural features from the local built environment and responds to the challenge of enhancing the Conservation Area. Materials, finishing and detailing will mark this development out as being a high-quality addition to the public realm, enabling active frontages and improvements to the streetscape.

5.5 The proposal will create a successful transition between the larger buildings and more intimately scaled 75 Wicklow Street (Grade II) and will make a positive contribution to the townscape. In accordance with the detailed assessment undertaken by Icení



Projects, there would be no harm to the significance of designated and non-designated heritage assets, in line with paragraphs 199-204 of the NPPF.

- 5.6 The site is located in a Central London Area where office development is appropriate and high-density residential development is supported due to the high levels of public transport accessibility. The proposal site is unused brownfield land and is not allocated on the proposals map. In accordance with the 2021 London Plan it would be considered as a small site and its development supported as a means of achieving the small sites target of 328 dwellings per annum over the plan period, a figure Camden seeks to exceed.
- 5.7 The development clearly meets the definition of sustainable development in accordance with Chapter 2 of the NPPF and the high-quality design approach should be given significant weight in accordance with Chapter 12 of the NPPF.
- 5.8 The proposal is policy compliant, as demonstrated in the previous chapter, and is a high-quality response to a prominent development opportunity with severe site constraints. The development should therefore be fully supported and planning permission should be granted.

Appendix 1

Date: 2nd August 2017
Our Ref: 2017/2942/PRE
Contact: Rob Tulloch: 020 7974 2516

Email: rob.tulloch@camden.gov.uk

CBRE Ltd
Fao Kate Goldie
Henrietta House
Henrietta Place
London
W1G 0NB

planning@camden.gov.uk
www.camden.gov.uk/planning

Dear Ms Goldie,

Planning Pre-application Advice: 340 Gray's Inn Road, London, WC1

Thank you for submitting a pre-planning application enquiry for the above site. This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Proposal

Erection of a three storey (basement, ground and 1st floor) extension to the Britannia Street elevation to provide two storeys of office accommodation and one storey of residential accommodation to provide an additional 220sqm of office floorspace and 279 (including a change of use) of residential.

Site and Surrounding

The site comprises a six storey plus basement building on the corner of Gray's Inn Road and Britannia Street. The basement, ground and 1st floors are in use as offices, and the upper floors are in use as residential. The building is constructed in red brick and dates from the 1970's, and forms the southern section of a block bounded by Gray's Inn Road to the west, Britannia Street to the south, Wicklow Street to the east and St Chad's Place to the north.

The site lies within sub area 4 of the King's Cross conservation area. The host building is neither listed nor identified as making a positive contribution to the character or appearance of the conservation area.

Gray's Inn Road is a busy thoroughfare and predominantly commercial in character, with some residential uses at upper floor level, and the site is just south of the King's Cross/Euston Central London Frontage. The secondary roads branching off Gray's Inn Road are quieter and contain a higher proportion of residential uses. Abutting the application site to the east is a five storey residential block.

The site has excellent transport links with a PTAL rating of 6(b) excellent and lies within the Kings Cross CA-D controlled parking zone. There is also a protected tree adjacent to the site on the corner of Gray's Inn Road and Britannia Street.

Planning History

CTP20926 The formation of a 4th floor at roof level to provide office accommodation and erection of a 6-storey and basement side extension at the corner of Gray's Inn Road and Britannia Street to provide basement laundry room and residential storage, ground floor office and showroom, first floor offices and 4 floors of residential (comprising 12 units) above at 344-356 Gray's Inn Road, WC1. Granted 08/12/1975

Relevant policies

National Planning Policy Framework 2012

The London Plan 2016

Camden Local Plan 2017

H1 Maximising housing supply
H2 Maximising the supply of self-contained housing from mixed use schemes
H4 Maximising the supply of affordable housing
H6 Housing choice and mix
E1 Economic development
E2 Employment premises and sites
A1 Managing the impact of development
A3 Biodiversity
A5 Basements
D1 Design
D2 Heritage
C6 Access for all
CC1 Climate change mitigation
CC2 Adapting to climate change
CC4 Air Quality
T1 Prioritising walking, cycling and public transport
T2 Parking and car-free development

Other Planning Policies / Guidance

Camden Planning Guidance
CPG1 Design
CPG2 Housing
CPG3 Sustainability
CPG4 Basements
CPG5 Town Centres, Retail and Employment
CPG6 Amenity
CPG7 Transport
CPG8 Planning Obligations

King's Cross Conservation Area Statement (2004)

Assessment

The main issues of consideration are:

- Design
- Land use
- Basements
- Amenity
- Sustainability
- Transport
- Community Infrastructure Levy

Design

The existing building

This unusual building made a considerate response to its urban block at the time of its construction, but has compromised the urban grain a little through the more wilful aspects of its planning, specifically: pulling the building line back from the pavement, especially on Britannia Street; introducing a hard level change on the line of the party boundary on Gray's Inn Road; and re-orientating the plot to present the building's flank to Gray's Inn Road, and its main entrance to Britannia Street. If the proposed extension can improve on, or correct some of these failures, this may represent a justification for dramatic alterations to a modest but attractive building and encroachment on open, albeit private, space.

Though it is to be read as the flank of the building, the elevation to Gray's Inn Road complements in materials, balances in scale and terminates in massing, the rest of the block facing the street (including the listed Willing House at the other end) with some success. This elevation is the most modelled and most interesting on the building, the elevation to Britannia Street working with a more regular grid. It is in the ground-level landscaping and interface with the street that the building offers least to the conservation area; for while the recessed ground- and first-floor bays and double-height blind 'colonnade' is important for composition, they create a dull and distant interface with the highway and open private space.

Design of the proposed extension, and context

The proposal would add a two-storey extension, part office and part residential, to the Britannia street elevation of the building, along with an extension to the existing basement, and extensive re-landscaping works to the surrounding (private) public realm.

- The proposed two-storeys have been chosen to relate to the double- (or 2.5-) height ground level of the building which works as a sort of blind colonnade or inverted plinth. In its relationship to the host building the addition will need to persuasively create a new architectural resolution for the whole building, since by erasing the 'inverted plinth' along the building's longest side, it would really transform the building's intended massing. The proposed design draws on the regular grid of the Britannia Street elevation, but as your document notes also

picks up on the classical proportions of nearby buildings on Gray's Inn Road; yet the refined grid uprights of the brick façade wrapping over the tight regularity of the first-floor residential windows may not provide the weight and definite shape the extension needs to sit comfortably among its neighbours. In this respect, the deeper recess and more pronounced layers of the proposed ground floor look likely to be more successful.

- The proposed massing of the addition looks likely to work well in the context of the surrounding small nineteenth-century buildings around the junction, which step down the height of the larger structures round them on Gray's Inn Road and Britannia Street. At present, the new 'roofline' or shoulder of the extension and the articulation of its massing is proposed to be flat and highly regular, which could juxtapose uncomfortably with the gables, dormers and hipped roofs of the older buildings opposite on Britannia Street, so the success of the proposed form will need to be carefully assessed and demonstrated in views. Concentrating the residential terrace in the centre of the proposed extension, which provides relief in the form of a void behind the façade, may be a missed opportunity in this regard.
- The amenity value of the terraces in the proposed arrangement - particularly that set-back from the street, is not entirely convincing as set-out in the submitted document.
- The whole block, including the host building, contains buildings from two centuries characterised by high solid-to-void ratios (note for instance even the recent extension to the RNTNE). Indeed, the most characterful buildings in the Conservation Area streets to the east feature brick-dominated facades and limited and composed fenestration, often reflecting their light industrial uses. The host building's modern construction does take account of this context in its use of brick and balance of windows, especially on the parts of the existing building that will remain most exposed. The proposed extension should take equal care to correspond with this Conservation Area context in its solidity, and the refined, applied masonry grid and absolute regularity of the façade treatment does not as presently proposed look likely to achieve this.
- It is unfortunate that the architectural and massing sketches do not show the architecture of the host building's elevations, since the relationship between your proposed architecture and the existing will be tricky to get right. Specifically: the recessed lower-level at present features full-height ground-floor glazing with a row of smaller windows reduced by a brick apron to the first-floor tucked up under the projecting second-floor above, while the proposed Britannia Street elevation proposes to reverse this, with elongated first-floor windows expressing the residential floor; and the junction between the top and flank parapet of the proposed extension with the Britannia Street facade of the host building is not explored at all. Some detail of these relationships would be welcome at application stage.

Landscaping and arrangement

Retention of the mature tree is necessary as it is the subject of a Tree Preservation Order, and the provision of a more amenable, attractive and accessible forecourt space is welcome, and could correct a detracting feature in the Conservation Area. An arboricultural report would be required at application stage to demonstrate that the tree would not be harm by construction.

- Since the proposed extension would make the set-back and forecourt to the flank-wall entrance of the neighbouring building which fronts Wicklow Street an exception to the consistent building line of Britannia Street, it should take care to create a good relationship with this space - and ideally to offer it something in terms of amenity and positive enclosure. This should be addressed and demonstrated in the DAS.
- The proposed set-back of the extension from the Gray's Inn Road frontage would appear to be the right approach - both for the architectural relationship with the ground-floor corner of the existing building - and to make the provision of a landscaped amenity space worthwhile. There are other small departures from the generally consistent building lines nearby in the Conservation Area, and this slight shift is likely to be acceptable.
- It is important though for the future integrity of the streetscene in this rather fragmented portion of Gray's Inn Road that the building's landscaping or boundary treatment does not bleed too far into, or confuse, the basic arrangement of the highway. Proposed publicly accessible space around the building could add greatly to local amenity, and should of course be visually and physically open and easily accessible, but should be well-defined and distinct from the main pavement too. Careful use of planters, seating and paving as proposed should achieve this.
- Also important for the streetscene, the proposed lightwells, whether glazed or open, could be too visually disruptive and incongruous in the rhythm of the street if wrongly placed or too extensive. The one intended to sit adjacent to the flank of the proposed extension looks most problematic in this respect.
- The existing breaks in level compromise the value of the open space and could helpfully be removed, but your proposals could go further in this regard on the northern party boundary - although it is acknowledged that this is partly outside the control of your clients and depends on the neighbouring condition. The proposed planter here, perpendicular to the building, is not ideal.

Land use

The proposal would entail extension to the office accommodation at basement and ground floor level, and an extension at 1st floor level to provide new residential accommodation in connection with a change of use of the existing 1st floor from office to residential.

The proposal would provide additional employment and residential floorspace which is welcomed and in line with policies E1 (Economic development) which seeks to direct new office development to growth area and Central London and H1 (Maximising housing supply) which seeks to secure a sufficient supply of homes.

Policy H2 (Maximising the supply of self-contained housing from mixed use schemes) promotes the inclusion of self-contained homes in non-residential development, In Central London, where development involves more than 200sqm of additional floorspace (GIA) we will require up to 50% of all additional floorspace to be self-contained housing. The proposal would create approximately 316sqm of additional floorspace over three floors. Although only 97sqm of the extension would be residential, a change of use of the 1st floor would result in an overall uplift of 279sqm of residential floorspace which would satisfy policy H2.

Policy H4 (Maximising the supply of affordable housing) requires all development that involves one or more additional homes and an increase in residential floorspace of more than 100sqm to make a contribution to affordable housing. The contribution is calculated using the target floorspace multiplied by £2,650 per sqm (the level of contribution per sqm described in Camden Planning Guidance – CPG2 and CPG8). Policy H4 uses a sliding scale to calculate the target floorspace. The target starts at 2% for the first 100sqm GIA of floorspace which is considered to be capacity for one additional home. This increases on a 'straight-line' basis with each additional 100sqm (i.e capacity for a further additional dwelling) increasing the target by 2%.

A rough estimate calculates your scheme to provide 279sqm (GIA) of new residential floorspace. Thus the target for a scheme with capacity for an additional 3 dwellings (279sqm rounded to the nearest 100) would be 6% of the proposed floorspace. As the calculation relies on CPG8, which has not yet been updated to respond to the Local Plan, the target is applied to gross external area as opposed to gross internal area. So in this instance the target might be 6% of 350sqm (GEA) or 21sqm (this is an estimate as no scaled floor plans have been provided). Policy H4 acknowledges that smaller schemes may not be able to provide the target floorspace on site and allows for a payment in lieu, which in this instance would be £55,650 (21sqm x £2,650).

Policy H6 (Housing choice and mix) identifies 2 and 3 bedroom units as high priority, and generally seeks a mix of small and large dwellings. 3x two or three bed units are being considered, which would be appropriate for the scale of development given the constraints.

Basements

The scheme involves excavation to create a basement, as such the proposal would need to comply with policy A5 (Basements). Parts a-e of the policy require an applicant to demonstrate that their proposal will not cause harm to the built or natural environment and require the submission of a Basement impact Assessment (BIA). The BIA needs to be compiled by a relevantly qualified engineer and address the criteria laid out in Camden Planning Guidance (CPG4 - Basements and lightwells). The site is within an area of constraint for land stability and groundwater flow and the BIA will also have to specifically address these issues. BIA's are also required to be independently assessed, with the cost of the assessment met by the applicant. In some circumstances, such as when a particularly complex construction methodology has been identified by the BIA, the independent review may recommend a Basement Construction Plan be submitted, this would be secured as part of a section 106 agreement.

As well as ensuring that basement development does not harm the built or natural environment, parts f-g of policy A5 set out certain constraints to ensure that basements are subordinate to the host building. Although these criteria are mainly for residential development, they can also applied to commercial schemes. The proposal would comply with parts f-g as the proposed basement is one storey, not under an existing basement and less than 1.5 times the footprint of the host building. It is not considered that the proposal is contrary to the parts which refer to gardens as the site

has never been a house and the space in front of the application site is best described as a courtyard and is not considered to be a garden.

As the basement would abut the public highway an Approval in Principle (AIP) may be required to demonstrate that the basement development does not affect the structural stability of the footway. An AIP will be secured as part of a section 106 agreement as there is a charge to cover the cost of review, and will be submitted to our Highways Team for assessment.

Amenity

Policy A1 (Managing the impact of development) seeks to protect the amenity of occupiers and neighbours.

Adjoining occupiers

The site abuts 46 Britannia Street which is a five storey residential block. The block has two columns of windows on its south elevation which have the potential to be affected by the above ground extension in terms of loss of light and, to a lesser extent, outlook. The extension has been set back from the boundary, but the ground and 1st windows of no. 46 would appear to lie within a 45° angle of the top corner of the extension in both plan and elevation, as such there is potential for daylight to be affected. As these windows also face within 90° of due south there is also potential for a loss of sunlight. As such, it is recommended that the types of room the windows serve is established and that a daylight/sunlight report accompany any application to establish the impact on sunlight and daylight of the proposed extension and demonstrate that the impact is in line with the BRE guidelines.

Upper floor windows on south side of Britannia Street would be approximately 14m away from the south elevation of the proposed extension. Camden Planning Guidance advises that a minimum distance of 18m is normally required between facing windows to protect residential amenity. The applicant is advised to establish whether any of these properties are in residential use. Further along Britannia Street, and in the surrounding streets, there is a similar distance between facing properties so in this instance, given the tight grain an urban location the degree of separation may be acceptable.

Access to the existing upper floor flats would be retained, but the extension would have to be built around it. Any application should also demonstrate how access for existing residents would be maintained during development. Access to neighbouring flats would also need to be protected.

Future occupiers

London Plan Policy 3.5 indicates that new homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose and meet the changing needs of Londoners over their lifetimes. Policy H6 (Housing choice and mix) therefore encourages design of all new housing to provide functional, adaptable and accessible spaces. In addition, the Local Plan applies specific space standards to all proposals for new self-contained homes, and applies

specific accessibility requirements to all proposals for new-build homes that are self-contained,

In accordance with the Mayor's Housing SPG, applications for development that includes housing should be supported by a Design and Access Statement showing how the proposal performs against Policy H6 requirements relating to space standards.

The development could comfortably accommodate 3x 3 or 2 bedroom flats, with policy compliant floorspace and a reasonable level of residential amenity. All units would also have access to external amenity space.

In line with policy CC4 (Air quality) a basic air quality assessment would be required due to the new residential units' proximity to Gray's Inn Road

Sustainability

Policy CC1 (Climate change mitigation) states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Policy CC2 (Adapting to climate change) states that the Council will require development to be resilient to climate change. All development should adopt appropriate climate change adaptation measures such as incorporating bio-diverse roofs, or the use of renewables.

Any application should be accompanied by an energy/sustainability statement that demonstrates how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation.

Transport

The site has a Public Transport Accessibility Level of 6b (Excellent) and is within the Bloomsbury/Kings Cross CA-E/D Controlled Parking Zone which operates Mon-Sat 08:30-18:30 and suffers from parking stress. Policy T2 (Parking and car-free development) requires all new development to be car free. This would be secured by way of a legal agreement.

In line with policy (T1 Prioritising walking, cycling and public transport) the Council will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding the minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within our supplementary planning document Camden Planning Guidance 7: Transport

Due to the narrow width of Britannia Street and the scale and nature of the proposed development, a Construction Management Plan (CMP) would be required, in line with policy A1 (Managing the impact of development). The CMP would need to identify the potential impacts of the construction phase and indicate how any potential negative impacts will be mitigated and will be secured via a section 106 agreement.

To assist developers in providing the correct information, the Council has created a Construction Management Plan Pro-forma which is tailored towards the specific

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needs of the borough. The Pro-forma is available on the Council's website <https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/making-an-application/supporting-documentation/construction-management-plans.en> and it is recommended that this accompany any application.

There is also an implementation support contribution for construction management plans, which is charged at £1,140 for smaller schemes (0-10 homes/0-1999sqm other uses). This would also for part of any section 106 agreement.

A financial contribution will also be required to repair any damage caused to the highway as a result of construction, in line with policy A1. This would also be secured by way of a section 106 agreement.

Community Infrastructure Levy (CIL)

The Mayor of London introduced a Community Infrastructure Levy to raise funds to contribute towards Crossrail. This applies to all development which adds one or more dwellings or more than 100sqm of floorspace (Gross Internal Area) at a rate of £50 per sqm. Camden has also introduced its own CIL which is in addition to the Mayor's CIL, the charges for Zone A (central) are £500 per sqm for new residential floorspace and £45 per sqm for office. Based on the information submitted with an uplift of 316sqm, the likely charged would be £15,800 (Mayoral CIL) and £58,355 for the Camden CIL (219sqm B1/97sqm C3).

Please refer to the Council's website for further information on the Borough's CIL <https://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/community-infrastructure-levy/>.

S106 obligations

As per the report, the S106 Legal Agreement will likely cover the following Heads of Terms:

- Construction Management Plan + Implementation fee
- Affordable housing contribution
- Car-free housing
- Highways contribution

And may also include

- Basement Approval in Principle
- Basement Construction Plan

Conclusion

There is no objection in principle to the proposed extension, but some elements of the design need to be refined. The proposal would provide new residential accommodation which is welcomed as long as it meets the Council's residential developments standards. As basement development is proposed, the application must be accompanied by a Basement Impact Assessment which will be independently assessed at the applicant's expense. The impact of construction can be mitigated by

a Construction Management Plan and the applicant is advised to submit a draft CMP using the Council's pro-forma. There is concern that the proposed extension would affect sunlight and daylight to adjoining occupiers and a daylight/sunlight report will be required to demonstrate that any impact is on line with the BRE guidelines.

Planning application information

If you submit a planning application, I would advise you to submit the following for a valid application:

- Completed form – Full planning application.
- The appropriate fee (£385)
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans, elevations and sections at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and access statement
- Planning statement
- Energy/sustainability statement
- Air Quality Assessment
- Basement Impact Assessment
- Construction Management Plan Pro-forma
- Daylight/sunlight report
- Arboricultural report
- Please see [supporting information for planning applications](#) for more information.

It is recommended that the applicant conducts its own consultation with surrounding neighbours and local groups.

We are legally required to consult on applications with individuals who may be affected by the proposals. We no longer notify neighbours by post, but we still display a notice on or near the site and, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

Proposals of this nature can be determined under delegated powers, but if three or more objections are received from local residents, or one or more objections from a local group, the application, if recommended for approval, will be submitted to a Members' Briefing Panel. The panel does not decide upon applications that are referred to it, but considers the nature and extent of the outstanding objections to the application by viewing the associated planning officer's report, application drawings, relevant photographs and letters of objection. Thereafter the Panel will either:

- advise that they are satisfied with the proposed decision being made under delegated powers
- recommend that the decision is made by the Development Control Committee instead

More details about how we make decisions can be found on our website [here](#).

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter please do not hesitate to contact me on 0207 974 2516.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Rob Tulloch

Senior Planning Officer
Planning Solutions Team

It is important to us to find out what our customers think about the service we provide. To help, we would be very grateful if you could take a few moments to complete our [pre application enquiry survey](#). We will use the information you give us to monitor and improve our services.