

# PLANNING, DESIGN & ACCESS STATEMENT

In respect of

**Redevelopment of Ruspini House**

At

**20-24 Parker Street, London, WC2B 5PH**

On behalf of

**Masonic Charitable Foundation**

JCG25836  
Planning Statement  
1.0  
November 2022

## REPORT

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### Appendix A – Photographic Survey

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# 1 INTRODUCTION

- 1.1 RPS Consulting Services Limited (RPS) has been instructed by the Masonic Charitable Foundation (MCF) to submit a planning application in support of the following development:

*External alterations to the existing building, including the replacement of the windows in the front elevation; alterations to the openings in the rear elevation and installation of replacement windows and doors; erection of an external plant enclosure in the rear yard, to accommodate 4 no. air source heat pumps; installation of solar PV panels and 2 no. air source heat pumps on the main roof and installation of cycle stand in the rear yard; in connection with the continued use of the building as six self-contained residential units.*

- 1.2 The planning application comprises of the following:

- Planning Application and CIL Forms
- Planning, Design and Access Statement (this document)
- Energy Statement (prepared by FHP ESS)
- Sustainability Statement (prepared by Element Sustainability)
- Noise Assessment (prepared by RBA Acoustics)
- Drawings:
  - Existing Site and Block Plan (Drg no. GD 601/GA/001 Rev. PL2)
  - Existing Ground Floor (Drg no. GD 601/GA/100 Rev. PL2)
  - Existing First Floor (Drg no. GD 601/GA/101 Rev. PL2)
  - Existing Second Floor (Drg no. GD 601/GA/102 Rev. PL2)
  - Existing Third Floor (Drg no. GD 601/GA/103 Rev. PL2)
  - Existing Fourth Floor (Drg no. GD 601/GA/104 Rev. PL2)
  - Existing External Space (Drg no. GD 601/GA/105 Rev. PL2)
  - Existing Roof Plan (Drg no. GD 601/GA/105 Rev. PL2)
  - Existing Front Elevation (Drg no. GD 601/GA/200 Rev. PL2)
  - Existing Rear Elevation (Drg no. GD 601/GA/201 Rev. PL2)
  - Existing Rear Terrace Elevation (Drg no. GD 601/GA/202 Rev. PL2)
  
  - Proposed Ground Floor (Drg no. GD 601/GA/110 Rev. PL2)
  - Proposed First Floor (Drg no. GD 601/GA/111 Rev. PL2)
  - Proposed Second Floor (Drg no. GD 601/GA/112 Rev. PL2)
  - Proposed Third Floor (Drg no. GD 601/GA/113 Rev. PL2)
  - Proposed Fourth Floor (Drg no. GD 601/GA/114 Rev. PL2)
  - Proposed External Space (Drg no. GD 601/GA/115 Rev. PL2)
  - Proposed Roof Plan (Drg no. GD 601/GA/116 Rev. PL2)
  - Proposed Front Elevation (Drg no. GD 601/GA/210 Rev. PL2)
  - Proposed Rear Elevation (Drg no. GD 601/GA/211 Rev. PL2)
  - Proposed Rear Terrace Elevation (Drg no. GD 601/GA/212 Rev. PL2)

- 1.3 The planning application fee is £407 (plus £32.20 inc. of VAT Planning Portal administration fee); this will be paid via the Planning Portal (ref: **PP-11617001**).

- 1.4 The purpose of this statement is to set out the details of the proposals and to address the relevant national, regional and local planning policies, as well as other material considerations.

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1.5 The structure of this statement is as follows:

- Section 2: details the relevant planning history
- Section 3: provides a review of the pre-application submission
- Section 4: outlines the pre-application consultation with the London Borough of Camden
- Section 5: includes details of the development proposals
- Section 6: contains a summary of relevant planning policies
- Section 7: provides a planning assessment of the proposals
- Section 8: considers the proposals design
- Section 9: reviews the proposed developments access
- Section 10: sets out the overall conclusions

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## 2 SITE AND SURROUNDING AREA

- 2.1 The site is located on the southern side of Parker Street, to the north of its junction with Drury Lane. Ruspini House is part of a 4 - 5 storey building, which forms part of a mixed use development built in the late 1980's, with the subject building being the residential element of the development.
- 2.2 The building is constructed out of second hand London stock brickwork with red brick gauged arches / soldier courses over the windows. The roof is in the form of a mansard, constructed out of slate, with inset dormer windows and projecting party walls; above the buildings main entrance is a pediment.



**Ruspini House (20-24 Parker Street)**

- 2.3 The ground floor elevation is inset and contains three entrance doors, providing access into numbers 20 & 24 and Ruspini House. At the south-west end of the building there are a pair of double gates that provides access to the rear yard.

2.4 As confirmed by the lawful use certificate, the lawful use of the premises is 6 no. self-contained residential units (4 maisonettes and 2 flats), with the units ranging from one to four bedrooms. The subject premises has been vacant for over two years.

2.5 The existing building requires substantial refurbishment to meet modern residential standards. It is considered that the existing flats are inadequately laid out, with a number of the units having a poor layout and small rooms, which would be below the minimum floorspace requirements set out in the Nationally Described Space Standards (NDSS). Furthermore, the existing building has a poor energy and sustainability performance, with a current EPC rating of C.

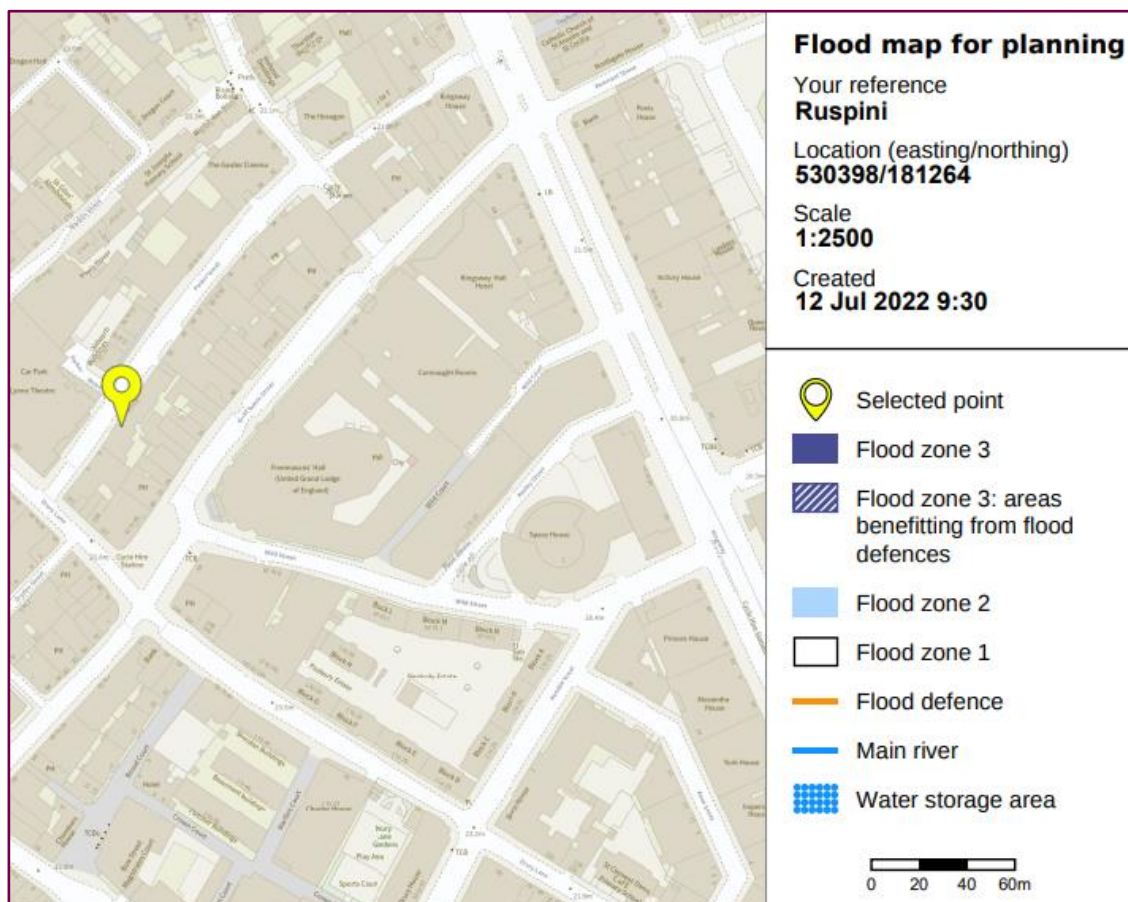
## Surrounding Area

2.6 Ruspini House is located within the Central London Area (Covent Garden Local Area) in a mixed use area containing residential, commercial, including the Gillian Lynne Theatre, which is on the corner of Drury Lane and Parker Street. It is also within the Seven Dials (Covent Garden) Conservation Area and is adjacent to grade II\* listed buildings to the rear of the property at 33-38 (inc.) Great Queen Street.

2.7 Holborn Tube Station is situated approximately 300 metres to the north, Covent Garden Tube Station is approximately 315 metres to the south west, a further 600 metres is Charing Cross Railway Station. Additionally, the site is well served by bus routes that run along Kingsway to the east.

2.8 The site has a Public Transport Accessibility Level (PTAL) rating of 6b – ‘The Best’, demonstrating it is in a highly accessible location and benefits from excellent public transport links.

2.9 The site is located within Flood Zone 1 (lowest probability of flooding).



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### 3 PLANNING HISTORY

- 3.1 The online planning application records of the London Borough of Camden have been reviewed, and we have highlighted the following planning permissions.
- 3.2 On 18 February 1985 planning permission (Ref: P14/35/E/36129) was approved for the redevelopment of 4 – 24 Parker Street and 160 – 161 Drury Lane, involving the erection of a new building comprising basement, ground and 4 storeys to provide residential, offices, retail, light industry and integral garages.
- 3.3 Planning permission (Ref: PSX0005063) was approved on 12 February 2001 for the replacement of all the windows at the property.
- 3.4 On 07 July 2010 planning permission (Ref: 2009/5944/P), was approved for the erection of an in-fill mansard roof extension at fourth floor level to provide additional living accommodation and the installation of windows at ground floor level on front elevation (in association with removal of garages and creation of additional living accommodation).
- 3.5 A Certificate of Lawfulness (Ref: 2021/2471/P) was granted on 25 October 2021 which confirmed that the lawful use of the property was as six flats (Class C3).

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## 4 PRE-APPLICATION

- 4.1 A Pre-application request was made to the London Borough of Camden (LBC) on 04 November 2021, on behalf of the MCF in respect of the following:

*External alterations to the existing building, including the replacement of the windows in the front elevation; alterations to the openings in the rear elevation and installation of replacement windows and doors; erection of an external plant enclosure in the rear yard, to accommodate an air source heat pump; installation of solar PV panels on the main roof and installation of cycle stand; in connection with the continued use of the building as six self-contained residential units.*

- 4.2 The pre-application response was issued on 15 September 2022, and undertook an assessment of the key issues, which have been summarised below:

### Principal of Development

- 4.3 Whilst the proposed internal alterations would not be considered to constitute development, Policy H1 supports the maximising housing supply through working to return vacant homes to use. Policy H6 requires that dwellings are high quality and meet the NDSSs. Furthermore, Policy H7 notes that three bedroom market housing is a higher priority than four bedroom market housing. The proposed internal refurbishment to improve the quality of accommodation is therefore supported.

### Design and Heritage

#### Front Elevation

- 4.4 The property is located in the Seven Dials Conservation Area and even though the building is a modern replacement, its form and detailed design does enhance the overall character of the street and positively contribute to the significance and general appearance of the conservation area.
- 4.5 The proposed replacement of the existing white double glazed uPVC windows to the front and rear elevations with anthracite metal framed units, would upset the uniformity of the fenestration and is not considered to be acceptable. If replacement is required, then this should be like-for-like; also the front doors should also be retained.
- 4.6 The proposed replacement of the blue tiles to the front elevation with green tiles would also harm the cohesive design of the front fenestration and is not considered to be appropriate.

#### Rear Elevation

- 4.7 As with the front elevation the replacement of the existing rear windows with anthracite metal framed units is not considered to be acceptable. In addition, the enlargement of a number of windows, would marginally increase natural light into the residential units; however, the alterations would interrupt the existing consistent fenestration pattern, as would the introduction of bi-fold doors with three panes of glass to terraces at ground, first, second and third floor level.
- 4.8 The proposed insertion of new doors and a replacement window at ground floor level to form access to a new outdoor area for the unit at No. 24 is considered acceptable; the size and detailed design of the doors should relate to the existing ground floor level doors and windows above.
- 4.9 The proposal to combine two rear windows into one at ground floor level to unit No. 20 and at second and third floor levels to units Nos. 22.1 and 22.3 would be acceptable
- 4.10 The proposal to infill the window to the first floor terrace of unit no. 20 and replace it with a wider high level window is unacceptable; further consideration would need to be given to window to unit no. 20.

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### **Plant, Ducting and PV Panels**

- 4.11 The location of the proposed rear plant enclosure (to house the communal air source heat pump) adjacent to existing high walls, is not considered to harm the character and appearance of the host building or the wider conservation area. However, the two associated risers would protrude from the building, disrupting the pattern and form of the rear building line, and would appear as visually domineering and incongruous elements. The repositioning of these risers on or within the building should be explored.
- 4.12 The proposed ventilation grilles to be installed on the rear elevation of the building are appropriately sized and follow a consistent pattern and therefore do not appear unduly intrusive. In addition, the proposed PV panels to be installed on the building's roof would not be visible in public views and are not considered to harm the character and appearance of the building or conservation area.

## **Neighbouring Amenity**

### **Noise / Plant**

- 4.13 As the scheme proposes the installation of new plant, Air Source Heat Pump (ASHP) and extraction system, a noise, vibration and ventilation assessment would be required to be submitted with the planning application.

## **Sustainable Design and Construction**

### **Refurbishment of the building**

- 4.14 The proposals involves the refurbishment of more than 5 existing residential units, as such the planning application must include an Energy Statement and a Sustainability Statement to demonstrate how the proposals will reduce the energy, water and materials used in design and construction.

### **Air Source Heat Pump**

- 4.15 The proposed removal of the existing gas heating system and its replacement with a centralised, communal ASHP for heating purposes is considered to be renewable and is supported and encouraged. However, ASHPs are not considered renewable in cooling mode; a condition would be required to ensure that the cooling function be permanently disabled.
- 4.16 The bio-diverse roof for the plant enclosure, have a number of sustainability benefits, and is supported.

### **Solar Panels**

- 4.17 An overshadowing assessment should be undertaken and a maintenance plan should be included with the proposals.

## **Air Quality**

### **Extraction system**

- 4.18 Whilst, the proposals would not be introducing new receptors, the site is located in an area of very poor air quality. The location of air inlets should consider the location of air inlets in relation to busy roads or any other pollution sources.

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## Transport

### Cycle Parking

- 4.19 The proposed 8 no. cycle parking spaces is welcomed, and the cycle storage should be provided as covered secure and accessible spaces. However, vertical and semi-vertical stands that require cycles to be lifted into place are generally not supported.

## Refuse and Recycling

- 4.20 Appropriate waste and recycling storage should be provided in all developments. The CPG Design provides details of the design and location of waste storage areas and residential waste collection services in Camden.

## Conclusions

- 4.21 The internal alterations to the residential units to improve the standard of accommodation are not considered to constitute development, but are nevertheless supported by policies H1, H6 and H7.
- 4.22 Nos. 8-24 Parker Street, of which the subject building forms a part, has been identified as enhancing the overall character of the street and making a positive contribution to the significance and general appearance of the Seven Dials Conservation Area. Any alterations to the front and rear fenestrations of the building should seek to retain the consistent fenestration pattern and detailing, and the replacement of windows and doors should only be considered in conjunction with Nos. 8-18 Parker Street.
- 4.23 Whilst the proposed replacement of gas heating with heating from a new ASHP is welcomed in sustainability terms, the positioning and design of the proposed risers connecting the ASHP with units needs to be reconsidered to ensure that it does not disrupt the pattern and form of the rear building line. A noise impact assessment is also required for the proposed plant and new extraction system.
- 4.24 The proposals would need to ensure that they meet the sustainability requirements for the residential refurbishment of 5 or more dwellings, which would be assessed through the submission of a sustainability statement and an energy statement.

## Planning Application Information

- 4.25 The pre-application letter goes on to advise that the planning should include the following supporting information:
- Completed Form – Full Planning Permission Application
  - Site Location Plan
  - Existing and Proposed Floor Plans
  - Existing and Proposed Elevation Drawings
  - Existing and Proposed Section Drawings
  - Design and Access Statement,
  - Energy Statement
  - Sustainability Statement
  - Noise Impact Assessment
  - Planning Fee (£407)

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## Site Visit

- 4.26 Following the receipt of the formal pre-application response, a site meeting was undertaken with the planning officer on 06 October 2022, in order to discuss a number of the points that were raised in the advice and changes to the proposals.
- 4.27 During the discussion on-site, the planning officer confirmed that the following elements were considered to be acceptable:

### Front Elevation

- Replacement of the windows, with white metal framed windows, which would have a similar design and profile to the existing windows.
- The replacement tiles would be blue to match the ones in the other buildings in the block.

### Rear Elevation

- The enlargement of the ground floor openings and insertion of white metal framed sliding doors.
  - On the right hand side of the building (no 24), at second and third floor levels, the combining of the small windows and dropping of the cills to reflect the height of the other windows.
  - Raising of the cill of the left most window (no. 20) at first floor level, as is set back from the rear elevation.
  - The removal of the two risers, which was enabled as the ASHPs had been changed from a communal system to a one unit per apartment.
  - The rear plant enclosure would house four of the ASHPs, while two would be housed on the roof of the main building.
  - The proposed semi-vertical cycle stand would be acceptable given that the current residential units do not have access to cycle parking and this would be an improvement.
- 4.28 The proposals that form the subject of this planning application have been revised to respond to the points raised in the pre-application advice, together with the further comments that were made by the planning officer during the site visit.

## 5 THE PROPOSAL

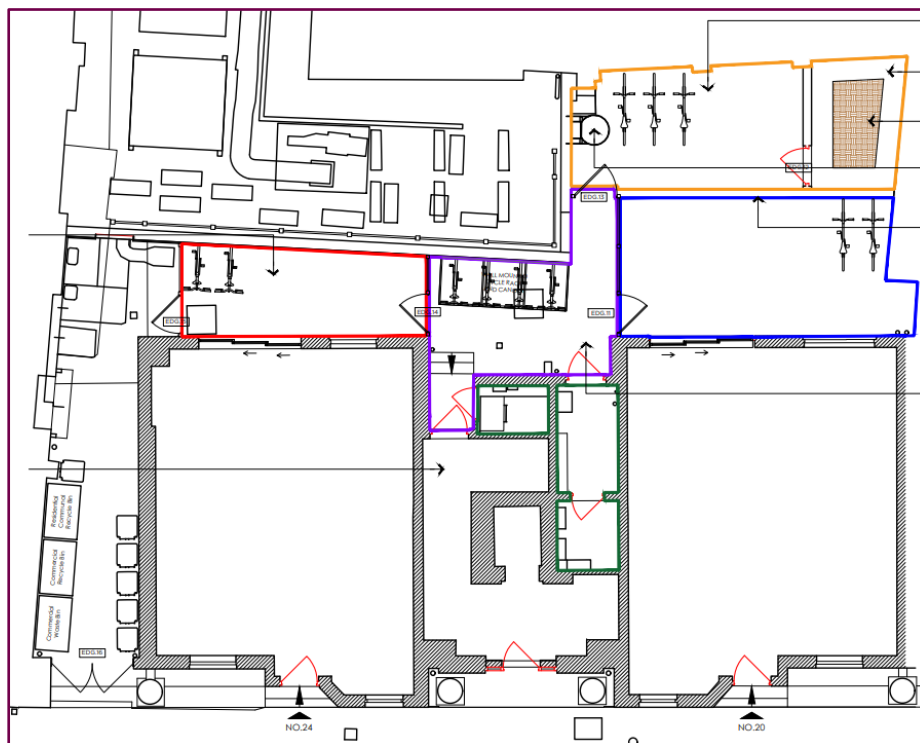
5.1 The proposed development, which is the subject of this planning application consists of the following:

- Replacement of existing uPVC double glazed windows with double glazed white metal framed windows on the front elevation.
- Alterations to the window and door openings in the rear elevation, and the installation of replacement double glazed white metal framed windows and doors.
- Installation of a 4 no. ASHPs in the plant enclosure in the rear yard; the plant enclosure will incorporate a bio-diverse roof.
- Erection of a screen around the existing plant located at first floor within the rear yard.
- Installation of solar PV's and 2 no. ASHPs on the main roof, in connected with the two upper floor maisonettes.
- Enhanced extraction systems in all flats, which will be vented through a flue in the rear elevations.
- Provision of 8 no. cycle parking spaces to the rear of the building.
- Formation of a refuse storage area, accessed through the double gates off Parker Street.

5.2 The above works will be in connection with the refurbishment of the existing six self-contained residential units to create:

- 2 no. three-bedroom maisonettes at ground and first floor level,
- a one-bedroom and two-bedroom unit at second floor level and
- 2 no. three-bedroom maisonettes at third and fourth floor levels.

5.3 Each unit will benefit from dedicated cycle parking, and new waste and recycling storage. The rear area will be sub-divided to provide the two ground floor maisonettes with their own private amenity space.



Proposed External Space Plan

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## 6 PLANNING POLICY CONTEXT

6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires all planning applications to be *‘determined in accordance with the development plan... unless material considerations indicate otherwise’*.

6.2 The relevant development plans include:

- London Plan (2021); and
- Camden Local Plan (2017)

### The London Plan (March 2021)

6.3 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor’s vision for Good Growth and forms part of the statutory development plan for London.

6.4 **Policy D1 ‘London’s form, character and capacity for growth’** – notes that boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas’ capacity for growth. Such assessments should cover 12-part criteria which includes urban form and structure, historical evolution and heritage assets and land uses.

6.5 **Policy D6 ‘Housing quality and standards’** housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. In addition, housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.

6.6 **Policy H9 ‘Ensuring the best use of stock’** boroughs should promote efficient use of existing housing stock to reduce the number of vacant and under-occupied dwellings.

6.7 **Policy H10 ‘Housing size mix’** schemes should generally consist of a range of unit sizes.

6.8 **Policy HC1 ‘Heritage conservation and growth’** outlines that London’s heritage assets and historic environment, which includes listed buildings, should be identified, enhanced, improved access to and conserved. Development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.

6.9 **Policy SI2 ‘Minimising CO<sup>2</sup> emissions’** major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

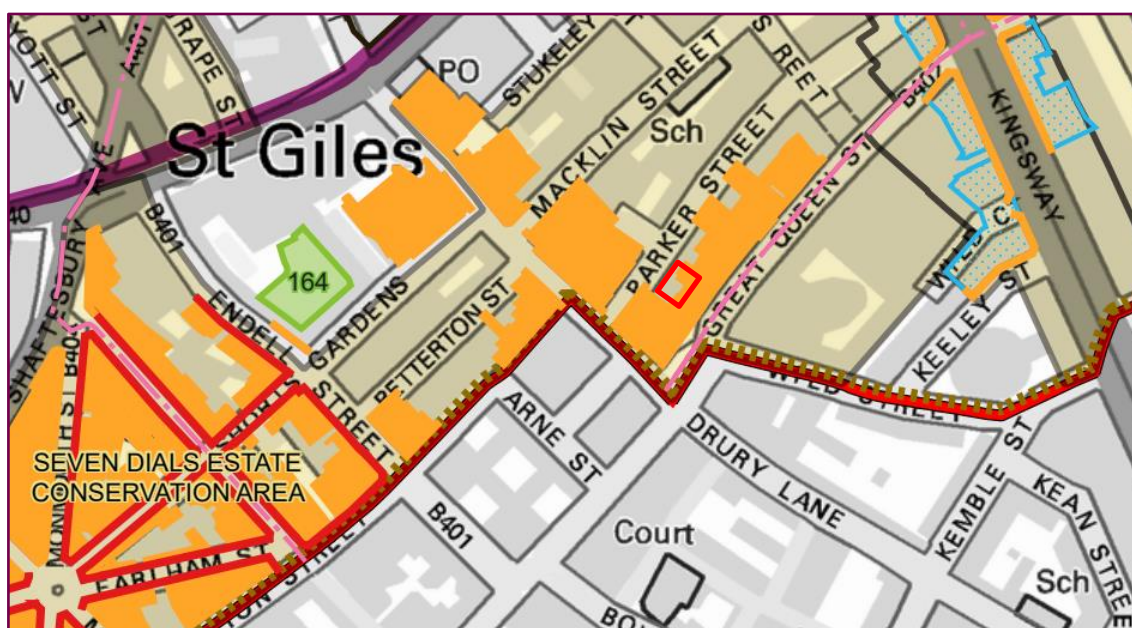
- 1) be lean: use less energy and manage demand during operation
- 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
- 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
- 4) be seen: monitor, verify and report on energy performance.

6.10 **Policy SI 4 ‘Managing heat risk’** development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.

- 6.11 **Policy SI 7 ‘Reducing waste and supporting the circular economy’** design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.
- 6.12 **Policy SI 12 ‘Flood risk management’** development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.
- 6.13 **Policy SI 13 ‘Sustainable drainage’** development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 6.14 **Policy T1 ‘Strategic approach to transport’** all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.
- 6.15 **Policy T5 ‘Cycling’** development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.
- 6.16 **Policy T6 ‘Car parking’** car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are well-connected by public transport.

## Camden Local Plan (July 2017)

- 6.17 The Camden Local Plan (CLP) was adopted on 03 July 2017 and is the key strategic document in Camden’s development plan. It sets out the vision for shaping the future of the Borough and contains policies for guiding planning decisions.
- 6.18 An extract of the LBC Proposals Map (2017) is reproduced below, this shows that the site is located within the following:
- Seven Dials Conservation area
  - Central London Area
  - Archaeological Priority Area
- 6.19 The site is also located within the London Plan’s Central Activity Zone – CAZ



Proposals Map Extract

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- 6.20 **Policy H1 (Maximising housing supply)**, the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing, including amongst other things working to return vacant homes to use and ensure that new homes are occupied.
- 6.21 **Policy H6 (Housing choice and mix)**, the Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs. In securing high quality accessible homes, all self-contained homes will be required to meet the nationally described space standards.
- 6.22 The Council will seek to secure a variety of housing suitable for existing and future households overall across development in the borough. When considering housing types in developments, they will support the development of private rented homes where this will assist the creation of mixed, inclusive and sustainable communities.
- 6.23 **Policy H7 (Large and small homes)**, the Council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. In addition, the Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development.
- 6.24 **Policy A1 (Managing the impact of development)**, the Council will seek to protect the quality of life of occupiers and neighbours. Permission will be granted for development unless it would cause unacceptable harm to amenity; so amongst other things, the following factors will be considered:
- visual privacy, outlook;
  - sunlight, daylight and overshadowing; and
  - transport impacts.
- 6.25 **Policy A3 (Biodiversity)**, the Council will protect and enhance sites of nature conservation and biodiversity and amongst other things will assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.
- 6.26 **Policy A4 Noise and Vibration)**, the Council will seek to ensure that noise and vibration is managed, and developments should have regard to the noise and vibration thresholds.
- 6.27 **Policy D1 (Design)**, the Council will seek to secure high quality design in development, by ensuring that it:
- respects local context and character;
  - preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
  - is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
  - is of sustainable and durable construction and adaptable to different activities and land uses;
  - comprises details and materials that are of high quality and complement the local character;
  - integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
  - is inclusive and accessible for all;
  - promotes health;
-

- is secure and designed to minimise crime and antisocial behaviour;
- responds to natural features and preserves gardens and other open space;
- incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- incorporates outdoor amenity space;
- preserves strategic and local views;
- for housing, provides a high standard of accommodation; and
- carefully integrates building services equipment.

6.28 **Policy D2 (Heritage)**, the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

6.29 **Policy CC1 (Climate change mitigation)**, 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. In this regard proposals will be required to:

- promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;
- require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;
- ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;
- support and encourage sensitive energy efficiency improvements to existing buildings;
- require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and
- expect all developments to optimise resource efficiency.

6.30 **Policy CC2 (Adapting to climate change)**, the Council will require development to be resilient to climate change. All development should adopt appropriate climate change adaptation measures.

6.31 **Policy CC3 (Water and flooding)**, the Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible, which amongst other things should require developments to:

- incorporate water efficiency measures;
- avoid harm to the water environment and improve water quality;
- consider the impact of development in areas at risk of flooding (including drainage);
- incorporate flood resilient measures in areas prone to flooding; and
- utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible.

6.32 **Policy CC5 (Waste)**, the Council will seek to make Camden a low waste borough and amongst other things: make sure that developments include facilities for the storage and collection of waste and recycling.

6.33 **Policy T1 (Prioritising walking, cycling and public transport)**, the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

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- 6.34 **Policy T2 (Parking and car-free development)**, the Council will limit the availability of parking and require all new developments in the borough to be car-free.

### Supplementary Guidance

- 6.35 Camden Planning Guidance (CPG) provides advice and information on how the Council will apply their planning policies. The adopted CPG documents can be 'material considerations' in planning decisions. However, they have less weight than the Local Plan or other development plan documents.
- 6.36 The CPG is divided into certain topics with the following being particularly relevant:
- Amenity (January 2021)
  - Design (January 2021)
  - Energy Efficiency and Adaption (January 2021)
  - Transport (January 2021).

### Other Considerations

- 6.37 The latest version of the National Planning Policy Framework (NPPF) March 2021, and the National Planning Practice Guidance (NPPG), is an online document.

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## 7 PLANNING ASSESSMENT

7.1 This section of the statement provides an assessment of the proposals against the policies of the adopted development plan. The main considerations relate to:

- Principle of Development
- Quality of Residential Accommodation
- Energy Efficiency
- Sustainability
- Noise and Vibration

### Principle of Development

7.2 London Plan Policy D3 states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites.

7.3 Policy H1 of the Local Plan confirms that the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing.

7.4 Policy H7 of the Local Plan advises that new developments, should provide a mix of unit sizes and emphasises the specific need of two- and three-bedrooms homes.

#### **Assessment**

7.5 The existing accommodation in the building is poorly laid out with a number of the units having small rooms and as such are in need of complete refurbishment.

7.6 The proposals seek to make a number of internal alterations to the units to reconfigure their layouts to enhance the quality of living accommodation. This would result in some units increasing in size, and the replacement of both four bedroom maisonettes with three bedroom maisonettes.

7.7 The internal alterations would not be considered to constitute development but would be in accordance with Policy H1 which supports the maximising housing supply through working to return vacant homes to use.

### Quality of Residential Accommodation

7.8 London Plan Policy D6 advises that housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners.

7.9 Policy H6 of the Local Plan states that high quality accessible homes in all developments are essential. This policy also outlines that the Council is determined to secure a variety of housing products in all sectors to meet the needs across all households.

7.10 Policy H7 of the Local Plan advises that the Council seek to secure a variety of housing suitable for existing and future households overall across development in the borough. When considering housing types in developments, they will support the development of private rented homes where this will assist the creation of mixed, inclusive and sustainable communities.

#### **Assessment**

7.11 Whilst the number of units will not alter, the proposed developments will address the poor layout and small room sizes to provide apartments and maisonettes, in a mix of one, two and three-bedrooms, to cater for a wide range of needs. The proposed mix of accommodation is detailed in the following table:

Proposed Accommodation Schedule				
Unit	Unit Type	Bedroom / persons	GIA sq. m	NDSS sq. m
20	Maisonette	3 bed / 4 person	101	84
24	Maisonette	3 bed / 6 person	113	102
22.1	Apartment	2 bed / 3 person	61	61
22.2	Apartment	1 bed / 2 person	55	50
22.3	Maisonette	3 bed / 5 person	110	93
22.4	Maisonette	3 bed / 5 person	113	93

- 7.12 The above table confirms the GIA floorspace of each unit and that the proposed units would comply with the NDSS and provide the future occupiers with a good level of accommodation.
- 7.13 The objective of the MCF is that the final product would offer high-quality, energy-efficient, low maintenance residential accommodation, allowing them to provide a high quality of living to all tenants.
- 7.14 All units would remain dual aspect and would exceed the NDSSs, and the rear courtyard would be subdivided to provide the maisonettes at Nos. 20 and 24 with their own private outdoor space.
- 7.15 Therefore, the proposal will improve on the existing quality of the existing dwellings and provide a high standard of residential of accommodation, in accordance with Policies H6 and H7.

## Energy Efficiency and Sustainability

- 7.16 LP Policy CC1 supports and encourages sensitive energy efficiency improvements to existing buildings and expects all developments to optimise resource efficiency.

### Energy Efficiency

#### Assessment

- 7.17 FHP Engineering Services Solutions (FHP ESS) has been instructed to prepare an Energy Statement. This statement carried out a high-level analysis on various low and zero carbon technology options for the refurbishment of residential building. The Energy Statement sets out the findings of the assessment and contains various energy efficiency strategies which are proposed to be incorporated into the design.
- 7.18 The formulation of the Energy Statement for the proposed development takes into account several important objectives:
- On-site Green House Gas emission reductions at least 35% above those set out in Part L of Building Regulations 2013.
  - Follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies set out in the London Plan (2021) Chapter 9 (particularly Policy SI 2) to achieve the fullest contribution to CO2 reduction.
  - Achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy).
- 7.19 The Energy Statement advises that in respect of the renewable energy sources available, the ones that will be utilised in the refurbishment of Ruspini House, will include ASHPs and solar photovoltaic cells.
- 7.20 In respect of the ASHPs it is proposed to install individual ASHP in each flat (MCS certified DAIKIN ERLA11DV3+EBVH16SU23D6V or equivalent), which will provide all space heating through low temperature wet underfloor heating or low temperature radiators / convectors, as well as all hot water demand. The system will comprise individual outdoor units and individual indoor unit with hot water storage in each apartment.

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- 7.21 The solar photovoltaic cells to be installed will provide a total peak output of 7 kWp, panels mounted on the main roof of the building, in the areas indicated on roof plan (Drg no. GD 601/GA/116 Rev. PL2). The solar PV panels will produce 5,323 kWh electricity per year offsetting 724 kgCO<sup>2</sup>.
- 7.22 The Energy Statement concludes that sustainable development principles will be considered throughout the design and implementation of the proposed project. In particular, incorporation of sustainable design and construction methods, energy and water saving measures, waste reduction techniques as well as measures to enhance the ecological value of the site, a good quality and sustainable development is proposed.
- 7.23 The London Plan approach of “Be lean” – “Be clean” – “Be green” is fully adopted by implementing:
- Passive measures (low U-values)
  - High efficiency services, i.e. low energy lights, high efficiency ventilation
  - Renewable sources: Individual air source heat pump, solar PV
- 7.24 As a result of the proposed energy strategy the proposed development will achieve:
- 87% domestic regulated CO<sub>2</sub> reduction against 2013 Part L1B compliant baseline
  - 81% domestic regulated CO<sub>2</sub> reduction by renewable sources
  - 5% reduction in regulated CO<sub>2</sub> by energy efficiency measures (Be Lean stage)

## **Sustainability**

### **Assessment**

- 7.25 In support of the planning application a Sustainability Statement has been prepared by Element Sustainability. This Statement has reviewed the sustainability performance of the residential development, against national and local planning policies. The conclusions that may be drawn are as follows:

#### Sustainable Performance

- The scheme is expected to achieve an indicative BREEAM Domestic Refurbishment score of ‘Excellent’ (73.39%).
- Water consumption of the development will be minimised. The internal water strategy will exceed the regulatory standard specified to achieve a calculated daily consumption of <100 litres / person / day through the specification of efficient water fixtures.
- The proposed scheme location promotes access to sustainable transport options. Provision of cycle storage and access to regular buses, trains and the Underground will all contribute towards creating a highly connected and sustainable development.
- The development site is located within Flood Risk Zone 1 and is also at low risk from surface flooding.
- Waste arising during refurbishment and occupation / operation will be minimised through the implementation of a Site Waste Management Plan (SWMP). The SWMP will be used to ensure that the adequate management of waste takes place.
- A refuse management strategy has been developed to manage waste and recyclables from the operational phase of the development. Source segregation and the provision of refuse areas will encourage the residents to recycle and divert waste away from landfills.
- Materials are to be responsibly sourced and materials with low environmental impact will be selected. In addition to this, local suppliers will be prioritised and material selection will be carefully considered to avoid the use of toxic materials and materials with VOCs.
- The development will incorporate a bio-diverse roof to the internal plant room which will provide new habitat for local flora and fauna species and support an increase in local biodiversity.

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- The re-use / retention of materials will be prioritised to maintain the existing character of the site and to limit resource consumption and limit embodied carbon impacts.

#### Energy Statement

- 7.26 The development will be designed and specified in accordance with the principles of the energy hierarchy and in line with the targets and guidance set out in Council's Local Plan Policy CC1.
- 7.27 To achieve the 20% reduction in CO2 emissions through renewable technologies, the following will be implemented:
- High efficiency services, i.e. high efficiency ventilation,
  - Passive measures (low U-values),
  - 100% energy efficient lighting,
  - Air source heat pump, are proposed to be the sole space heating and DHW source in each flat; and,
  - Photovoltaics.
- 7.28 In conclusion, the proposals reviewed within this statement for the scheme at Ruspini House will deliver a highly energy efficient and sustainable scheme, providing a quality development that accords with the guidance provided within the Council's adopted planning policies with regard to sustainable construction performance.
- 7.29 Therefore, the proposed development would with Policy CC1 of the Local Plan.

### **Noise**

- 7.30 London Plan Policy D14 summarises national policy objectives for noise, the requirements of the specific policies and adds that noise should be managed by promoting new technologies and improved practices to reduce noise.
- 7.31 Policy A4 of the Local Plan advises that the Council seek to ensure that noise and vibration is managed, and developments should have regard to the noise and vibration thresholds.

#### **Assessment**

- 7.32 RBA Acoustics has been instructed to undertake an assessment of the potential noise impacts that could result from the operation of the proposed plant associated with the refurbishment of Ruspini House. The Plant Noise Assessment (PNA) presents the results of the noise measurements, associated criteria, and provides the required assessment.
- 7.33 The resultant noise levels have been used to determine the required criteria for atmospheric noise emissions from the proposed plant installations.
- 7.34 The PNA advises that provided that the mitigation measures identified (acoustically rated louvres) are included in the design and installation, the results of the assessment indicate atmospheric noise emissions from the proposed plant are within the criteria required by the London Borough of Camden, as such, can be considered acceptable in terms of noise.
- 7.35 Therefore the proposals would comply with London Plan Policy D14 and Policy A4 of the Local Plan.

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## 8 DESIGN

- 8.1 Policy D3 of the London Plan advises that development must make the best use of land by following a design led approach that optimises the capacity of sites, by ensuring that development is of the most appropriate form and land use for the site.
- 8.2 LP Policy D1 outlines that the Council will seek to secure high quality design that:
- respects local context and character through high quality details and materials;
  - preserves or enhances the historic environment and heritage assets; and
  - integrates well with the surrounding streets and open spaces; and preserves strategic and local views.
- 8.3 The building that is the subject of this planning application was built in the late 1980s and followed a rather utilitarian design; the building quality and aesthetic are now considered dated and in need of refurbishment. It is noted that an attempt was made to modernise the building in circa. 2001 when the windows were replaced with UPVC double glazing; however, on inspection these have aged badly and their replacement is included in the current proposal.
- 8.4 The photographic survey (**Appendix A**) that has been submitted in support of the application shows Ruspini House in its context. In addition, the photographs also demonstrate there is a range of window types along Parker Street.
- 8.5 Since the pre-application submission the proposals has been through further design evolution, with regard the choice of the proposed window frames, the proposed heating system, and rationalising a number of the window openings on the rear elevation.
- 8.6 On the front elevation in light of the advice from the planning officer, the choice of windows have been altered from anthracite metal framed windows to white metal framed units to ensure that they are in keeping with the other buildings in this block. The replacement metal framed windows would be a better-quality material with appropriate U-values and security measures.
- 8.7 The original proposal was to have a centralised building heating design which would require below ground trench across the rear yard and two external risers were required to distribute service pipework. This was discussed with the planning officer during the pre-application stage, as it was considered that it would have detrimental effect on the rear elevation of the building, and the route and design of the risers should be revisited.
- 8.8 The heating system which forms the part of the planning application has moved away from a centralised system to a system that has individual ASHP in each flat that requires smaller localised pipework, which can be housed within the internal common parts riser and distributed within the envelope of the building.
- 8.9 The significant benefit of this system is the two risers are no longer required and have been removed. As a result the windows that were to be relocated to accommodate the risers, no longer need to be moved on the rear elevation. In addition, the number of windows where the cills are to be dropped has been reduced and the few windows that are being amalgamated or slightly enlarged, will bring them in line with other adjacent windows and those of the neighbouring property.
- 8.10 As a result of these changes the window openings have been rationalised to provide a more unified appearance. Again, like the front elevation the replace window and door units would have white metal frames.



**Proposed Rear Elevation**

- 8.11 The design of the building in both the communal areas and individual dwellings will be updated with modern amenities.
- 8.12 The proposal will accordingly respect and enhance the appearance of the existing buildings, and that of the wider street scape, as per the requirements of London Plan Policy D3 and Policy D1 of the Local Plan.

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## 9 ACCESS

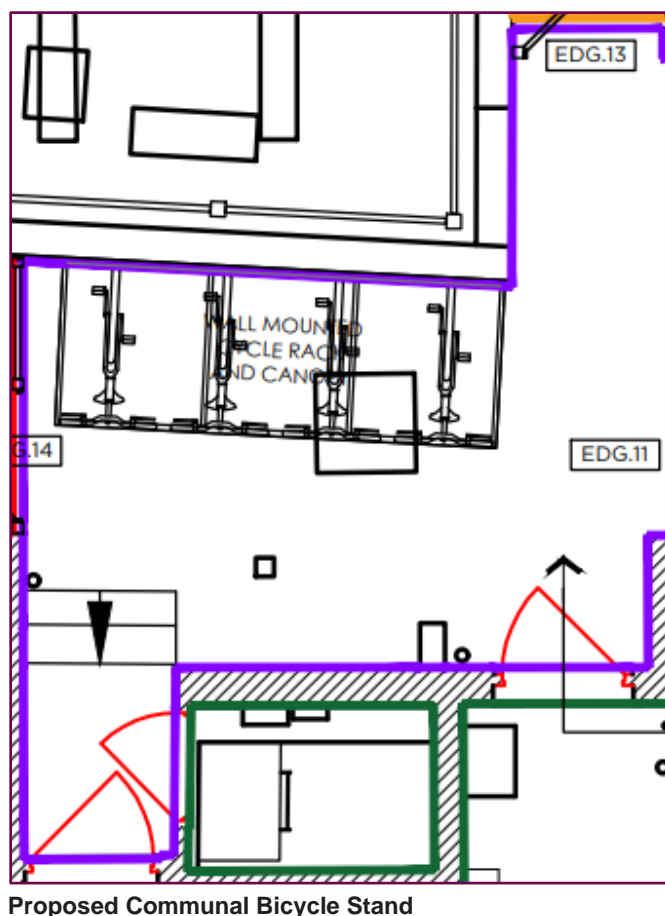
- 9.1 London Plan Policy T3, requires an appropriate balance to be struck between promoting new development and preventing excessive car parking provision that would undermine cycling, walking and public transport use.
- 9.2 Policy T2 of the Local Plan, outlines the Council will limit the availability of parking and require all new developments in the Borough to be car-free, limiting on-site parking to disabled people and essential operational or servicing needs. Cycling parking standards are set out in London Plan Policy T5.
- 9.3 Policy CC5 of the Local Plan seeks to ensure that developments include facilities for the storage and collection of waste and recycling.

### Car Parking

- 9.4 Similar to the current building, no off-street car parking will be provided as part of the proposed development and the residents will need to utilise alternative means of travel, including public transport, walking and cycling.

### Cycle Storage

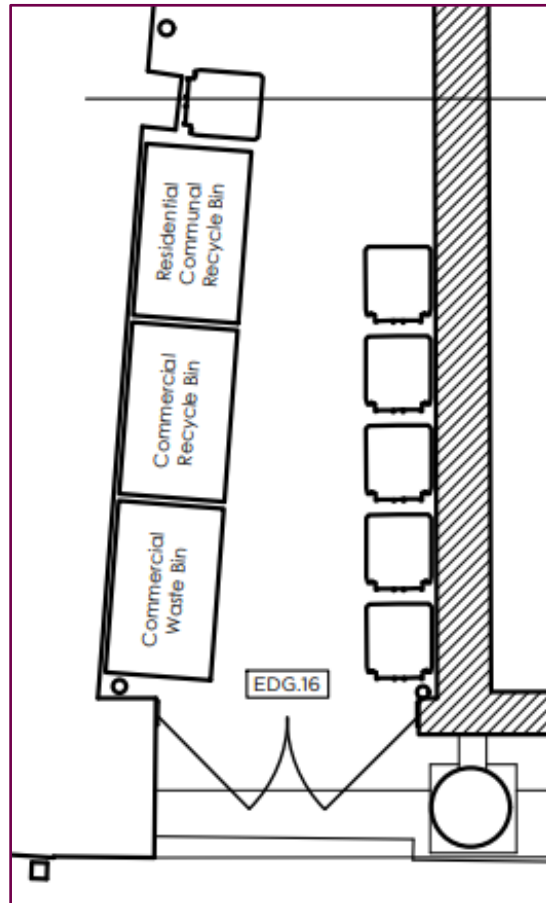
- 9.5 Whilst there is currently no cycle parking spaces at the existing building, as part of the proposed development, secure, covered cycle parking stands will be provided to the rear of the building. The cycle parking for units 20 and 24 would be contained within their private amenity space, whereas for the four other units there would be a communal bicycle stand close to the rear door. In all cases the cycle parking spaces will be accessed through the buildings' main entrance.



Proposed Communal Bicycle Stand

## Refuse Storage

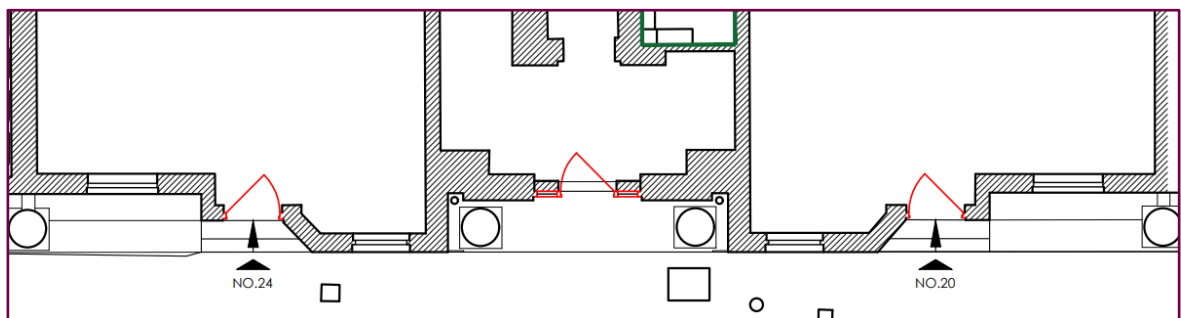
- 9.6 The development proposals will include the provision of a covered refuse storage area, which provide appropriate receptacles to store both general and recyclable waste. The refuse storage area would be located behind the double gates off Parker Street, so while it is secure, it is accessible on collection days.



**Proposed Refuse Storage Area**

## Building Access

- 9.7 The three existing pedestrian accesses will be maintained, unit numbers 20 and 24 will have their own front door. Whilst the four units on the upper floors will use the existing door located in the centre of the building and will be accessed by a staircase or the recently refurbished lift.



**Building Entrances**

- 9.8 The proposal is therefore in accordance with London Plan Policy T5 and Local Plan Policies T2, and CC5.

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## 10 CONCLUSION

- 10.1 RPS has been instructed by MCF to submit a planning application for the following development:

*External alterations to the existing building, including the replacement of the windows in the front elevation; alterations to the openings in the rear elevation and installation of replacement windows and doors; erection of an external plant enclosure in the rear yard, to accommodate 4 no. air source heat pumps; installation of solar PV panels and 2 no. air source heat pumps on the main roof and installation of cycle stand in the rear yard; in connection with the continued use of the building as six self-contained residential units.*

- 10.2 Overall, the proposal will result in the complete refurbishment of the existing building, replacing the existing accommodation which have poor layouts and small room sizes to provide apartments and maisonettes, including a mix of one, two and three-bedrooms.
- 10.3 Whilst the building's appearance would not be significantly altered, the energy efficiency and sustainability performance of the building would be substantially improved.
- 10.4 The proposed development is considered to accord with the relevant planning policies and constitutes sustainable development.
- 10.5 Furthermore, in accordance with paragraph 39 of the NPPF the applicant submitted a pre-application request and entered into discussions with the LBC and has taken on board the advice and amended the proposals accordingly.

Therefore, in light of the above, there would appear to be no objection for the refurbishment of the existing building, and as such we would request that planning permission is granted.

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## **Appendix A**

### **Photographic Survey**

# Ruspini House

## Planning Appendix

04.11.2022

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601 - Ruspini House





Ruspini House – Front Elevation

601 - Ruspini House



Ruspini House – Rear Elevation

## 601 - Ruspini House





Ruspini House – Rear Courtyard and Access Walkway

## 601 - Ruspini House