

<b>Delegated Report</b>		<b>Analysis sheet</b>	<b>Expiry Date:</b>	10/05/2022
		N/A / attached	<b>Consultation Expiry Date:</b>	12/06/2022
<b>Officer</b>			<b>Application Number(s)</b>	
Elaine Quigley			2022/1065/P	
<b>Application Address</b>			<b>Drawing Numbers</b>	
2A Gate Street London WC2A 3HP			See draft decision notice	
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>	
<b>Proposal(s)</b>				
Erection of an additional storey at fourth floor level (following removal of the roof) and erection of a mansard roof extension to create a new one bedroom self-contained flat (Class C3) with external roof terrace and privacy screen, green roof and alterations to windows on front elevation at third floor.				
<b>Recommendation(s):</b>		Refuse planning permission		
<b>Application Type:</b>		Full Planning Permission		

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice					
Informatives:						
<b>Consultations</b>						
Adjoining Occupiers:	No. notified	<b>00</b>	No. of responses	<b>00</b>	No. of objections	<b>01</b>
Summary of consultation responses:	<p>1 letter of objection received from local resident at 4E Gate Street raising the following concerns:</p> <p><b>Design</b></p> <ul style="list-style-type: none"> <li>The proposal would spoil the cascading view of numbers 2, 4 and 6 from the street and would look out of place with the existing (including listed) buildings</li> </ul> <p><b>Amenity</b></p> <ul style="list-style-type: none"> <li>Quality of light affected to 4a, c, d, and e Gate Street due to projection of building at rear into Whetstone Park</li> <li>Loss of privacy due to roof garden and proposed balconies which would afford direct views into bedrooms and bathroom as well as kitchen / lounge of no. 4e Gate Street. Any privacy screen would further affect the light</li> <li>Noise pollution from roof terrace</li> </ul>					
CAAC	<p><b>Bloomsbury CAAC – no comments</b> No response received from the CAAC during the course of the application.</p>					

## Site Description

The building forms part of a terrace of properties on the east side of Gate Street. The site is located on the east side of Gate Street on the corner of Gate Street and Whetstone Park that runs perpendicular to the east and Twyford Place to the west. The building is a five storey C18th century building that comprises a retail unit on the ground floor and 3 residential flats above located over first to third floors. The building is identified as a positive contributor within the Bloomsbury Conservation Area.

The building itself is not listed, but there are several other listed buildings in the vicinity. Opposite to the south is the rear façade of nos. 1 and 2 Lincolns Inn Fields, and to the north west is Africa House, both of which are Grade II listed. Further afield are The Roman Catholic Church of St Anselm and St Cecilia on Kingsway (Grade II Listed); 233 High Holborn (Grade II Listed); and Powis House on Lincolns Inn Fields (Grade II\* Listed).

The surrounding area is commercial in character with building heights ranging between 4 and 8 storeys.

The site lies within the Bloomsbury Conservation Area (CA) and the building is identified as making a positive contribution to the CA.

## Relevant History

### Application site

#### 2006

Planning permission was **refused** (ref 2006/5115/P) on 16/04/2007 for alterations to existing roof involving an increase in ridge height and formation of a new dormer window to the front and 2x to the side elevation in connection with the formation of an additional self-contained residential flat (Class C3) at roof level of the existing residential building (Class C3) with ground floor cafe (Class A1) (see figure 1 below illustrating proposal). The 2 reasons for refusal include:

1. design of the dormer windows and the detrimental impact on the character and appearance of the building and this part of Bloomsbury Conservation Area and
2. Inadequate size of the self-contained flat leading to substandard accommodation resulting in detrimental harm to the amenity of future occupiers.

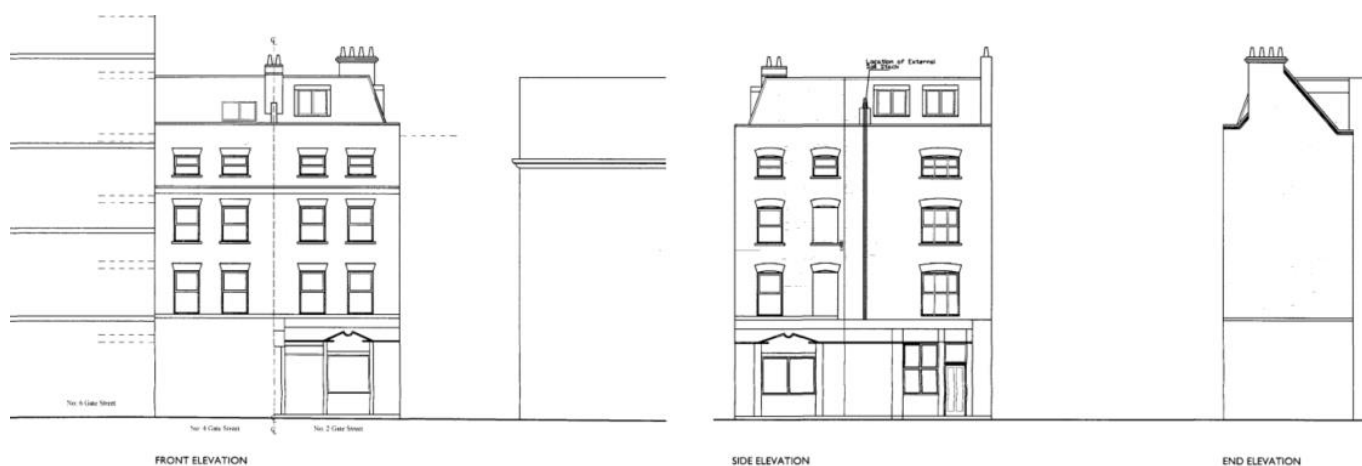


Figure 1: Proposed front, side and rear elevations of the refused scheme (ref 2006/5115/P).

#### 2008

Planning permission was **granted** on 27/08/2008 (ref 2008/1926/P) for erection of a mansard extension at roof level to enlarge existing self-contained flat at third floor level.

#### 2011

Planning permission was **granted** on 17/10/2011 (ref 2011/4396/P) for renewal of planning permission granted on 27th August 2008 (ref: 2008/1926/P) for the erection of a mansard extension at

roof level to enlarge existing self-contained flat at third floor level.

## Other adjoining sites

### 4a Gate Street

#### 2007

Planning application was submitted on 03/05/2007 (ref 2007/2122/P) for erection of additional storey roof extension to provide 1 no. 2 bedroom self-contained residential flat. The application was withdrawn on 28/06/2007.

#### 2008

Planning permission was **refused** on 18/11/2008 (ref 2008/4356/P) for erection of a roof extension at fifth floor level to existing flat at fourth floor level (Class C3). The reason for refusal read as follows:

*“The proposed roof extension, by reason of its height, bulk and design would be a discordant feature which would detract from the character and appearance of the host building, the street scene and the wider Bloomsbury Conservation Area, contrary to policies B1 (General design principles), B3 (Alterations and extensions) and B7 (Conservation areas) of the London Borough of Camden Replacement Unitary Development Plan 2006, and design advice in the Camden Planning Guidance 2006 and the Bloomsbury Conservation Area Statement”.*

Planning permission was **refused** on 06/03/2009 (ref 2009/1375/P) for reconfiguration of the existing fourth floor to provide a sheer fourth floor storey on the west (Gate Street) elevation, erection of a roof extension at fifth floor level and alterations to windows on the west elevation at third floor level, all in association with the existing fourth floor flat (Class C3).

Both decisions were challenged through the appeal process (APP/X5210/A/09/2104581 and APP/X5210/A/09/2104580) on 21/05/2009. The 2008 scheme was **dismissed** on 21/09/2009 and the 2009 was **allowed** on the same date.

## Relevant policies

### National Planning Policy Framework 2021

#### The London Plan 2021

#### Camden Local Plan 2017

##### *Meeting housing needs*

- H1 Maximising housing supply
- H3 Protecting existing homes
- H4 Maximising the supply of affordable housing
- H6 Housing choice and mix
- H7 Large and small homes

##### *Community health and wellbeing*

- C5 Safety and security
- C6 Access for all

##### *Protecting amenity*

- A1 Managing the impact of development

##### *Design and Heritage*

- D1 Design
- D2 Heritage

## *Sustainability and climate change*

CC1 Climate change mitigation

CC2 Adapting to climate change

CC3 Water and flooding

CC4 Air quality

CC5 Waste

## *Transport*

T1 Prioritising walking, cycling and public transport

T2 Parking and car-free development

T3 Transport infrastructure

T4 Sustainable movement of goods and materials

## Camden Planning Guidance

Housing CPG 2021

Design CPG 2021

Amenity CPG 2021

Transport CPG 2021

Developer contribution CPG 2019

## Bloomsbury Conservation Area Appraisal and Management Strategy 2011

## **Assessment**

### **1.0 Proposal**

1.1 Planning permission is sought for the erection of single storey extension at fourth floor level (following removal of the roof) and erection of a mansard roof extension to create a new residential flat with external terrace and privacy screen and alterations to windows on front elevation at third floor

### **2.0 Assessment**

2.0 The main issues to be assessed as part of the proposal are:

- Creation of new housing
- Housing mix, unit size, quality of accommodation and affordable housing
- Design and heritage
- Amenity
- Transport considerations
- Energy and sustainability
- Water and drainage

### **3.0 Creation of new housing**

3.1 Housing is regarded as the priority land-use of the Local Plan as set out in policy H1 and the Council makes housing its top priority when considering the future of unused and underused land and buildings. Given the existing residential use of the host building, this is considered an appropriate location for an additional homes, and the proposals would comply with Policy H1 in this regard. Great weight has been given to the provision of additional housing.

### **4.0 Housing mix, unit size, quality of accommodation and affordable housing**

#### Mix of unit sizes

4.1 The existing building comprises 3 x 2 bed units. The proposal would create a 1 bedroom

maisonette at 4<sup>th</sup> and 5<sup>th</sup> floor levels with its bedroom within the new mansard roof.

- 4.2 Policy H7 seeks to provide a range of unit sizes to meet demand across the Borough. For market units, table 1 of this policy considers 1 bedroom / studios to have a lower priority, 2 and 3 bedroom units to be of high priority and 4 bedroom (or more) a lower priority. The majority of the existing flats in the building are higher priority dwelling sizes. The proposal would provide a 1 bedroom dwelling which is identified as lower priority.
- 4.3 It is recognised that there is a demand for homes of all sizes. Given that there are 3 two bedroom flats within the existing building, the addition of a smaller 1 bed unit is considered to provide a mix of unit sizes and is considered acceptable here and in accordance with policy H7.

#### Design and layout

- 4.4 Policy H6 relates to housing choice and mix and encourages the design of all housing in the borough to provide functional, acceptable and accessible spaces; and Policy D1 notes that housing must provide a high standard of accommodation. The London Plan includes nationally described space standards. The minimum gross internal floor areas are set by the number of bedrooms and bed spaces / occupiers in each dwelling. The requirements are 50sq.m for a 1 bedroom 2 person flat. The proposed dwelling at 4<sup>th</sup> and 5<sup>th</sup> floor levels would comply with the required floor areas measuring approx. 60sq.m.
- 4.5 The flat would be dual aspect which would provide adequate daylight and sunlight into the flat. An outside amenity space would also be provided at 5<sup>th</sup> floor level measuring 7sq.m. There is no lift within the existing building and the existing flats are accessed via an internal stair. It would not be possible to install a lift without undertaking major internal works so there would be no step-free access. The new unit would have permanent separation between eating and sleeping areas and would include adequate storage space and would be accessible and adaptable to a range of occupiers.
- 4.6 New windows would be installed in the western front elevation and southern side elevation of the building at fourth floor level. These windows would not directly overlook any windows within neighbouring buildings, but instead face onto Twyford Place to the west and would look out onto the rear of nos. 1 and 2 Lincoln's Inn Fields which has a blank façade at 4<sup>th</sup> floor level on the rear. The terrace at the rear would include a privacy screen on the north side elevation to ensure there would be no overlooking of windows on the side/ rear of no. 4 Gate Street directly to the north. If permission were otherwise considered acceptable, a planning condition would secure the installation of the privacy screen to ensure there would be no overlooking from or into the terrace from the windows of neighbouring occupiers.
- 4.7 Overall, subject to a condition to install a privacy screen, the development would provide an acceptable standard of accommodation for future occupants.

#### Affordable housing

- 4.8 Policy H4 seeks to maximise the supply of affordable housing in the Borough. It notes that the Council will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total additional to residential floorspace of 100 sq.m (GIA) or more. In this case the proposal provides 1 additional home and a total uplift of 660 sq.m (GIA) and therefore a contribution towards affordable housing in the Borough is not required.

### **5.0 Design and Heritage**

- 5.1 Section 72(1) of the Act requires that with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or

appearance of that area when considering applications relating to land or building within that area.

- 5.2 The effect of this section of the Listed Buildings Act is that there is a statutory presumption in favour of the preservation of the character or appearance of the Conservation Area. Considerable importance and weight should be attached to their preservation. A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption. The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (section 16).
- 5.3 NPPF section 16 paras. 189 to 202 in particular, London Plan policies D1, D3, D4 and D5 and Camden Local Plan policies D1 and D2 are relevant with regards to conservation and design. Camden's Local Plan policies are supported by the 'Design' CPG and the Bloomsbury Conservation Area Appraisal and Management Strategy.
- 5.4 The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including Conservation Areas and listed buildings.
- 5.5 The building itself is not listed, but there are several of listed buildings in the vicinity. Opposite to the south is the rear façade of nos. 1 and 2 Lincolns Inn Fields, and to the northwest is Africa House, both of which are Grade II listed. Further afield are The Roman Catholic Church of St Anselm and St Cecilia on Kingsway (Grade II Listed); 233 High Holborn (Grade II Listed); and Powis House on Lincolns Inn Fields (Grade II\* Listed).
- 5.6 The building is identified as making a positive contribution to the Bloomsbury Conservation Area. The Council has a statutory obligation to preserve or enhance the character and appearance of the conservation area, to which the subject site makes a strongly positive contribution. The building clearly dates from the mid-late 18thC and appears on Horwood's Plan of 1792.
- 5.7 The building is particularly considered to form part of the setting of 1 and 2 Lincoln's Inn Fields. It dates from the same period as 1 and 2 Lincoln's Inn Fields, is of similar architectural language and materials, and together with the rear of these buildings 'bookends' the western entry to Whetstone Park both in axial and oblique views.
- 5.8 The Bloomsbury Conservation Area Appraisal and Management Strategy notes:  
*"5.173 Gate Street and Little Turnstile are two narrow, highly enclosed streets leading from the north-west corner of Lincoln's Inn Fields, reflect the historic street pattern and are defined by mainly 19th century commercial buildings."*
- 5.9 Nos. 2 and 4 Gate Street are two of the oldest buildings on the street, and Number 2 is the oldest least-altered building on the street.
- 5.10 The *Bloomsbury Conservation Area Appraisal and Management Strategy* notes in para 5.28 and 5.29:  
*"5.28 Development proposals must preserve or enhance the character or appearance of the Bloomsbury Conservation Area. This requirement applies equally to developments which are outside the Conservation Area but would affect its setting or views into or out of the area."*

5.38 *The Conservation Area retains many diverse historic rooflines which it is important to preserve. Fundamental changes to the roofline, insensitive alterations, poor materials, intrusive dormers, or inappropriate windows can harm the historic character of the roofscape and will not be acceptable. Of particular interest are butterfly roof forms, parapets, chimneystacks and pots and expressed party walls.”*

- 5.11 The existing roof is a half-hipped return roof, and is partially visible from the public realm on the western and southern approaches to the building. The façade is articulated in the conventional astylar classical manner of three lower storeys, stringcourse and attic. This emulates the proportions of the return elevation of 1 Lincoln’s Inn Fields which, being a higher-ranking property, has its string course articulated as a bracketed cornice. It is also important to note that Gate Street was originally a lower terrace than the grander buildings of Lincoln’s Inn Fields, and that No.2 appears to be the last surviving example of that scale-relationship.
- 5.12 The appeal decision dated September 2009 (APP/X5210/A/09/2104580) for upward extension of No. 4 Gate Street has been taken into consideration in this assessment. 4 Gate Street, which has now implemented an additional full storey, demonstrates the harm that is caused by this alteration. The alteration to No.4 has resulted in a very atypical proportion for a Georgian façade, partly created by the additional height on a two-bay frontage but also by the fact that the stringcourse now has two attic storeys above it. It should also be noted that 4 Gate Street is a different site, and that the appeal decision pre-dates the current *Bloomsbury Conservation Area Appraisal and Management Strategy* (2011).
- 5.13 This results in an architecturally illiterate elevation which undermines the original classical principles which informed the original composition. While there are examples of two storeys rising above a string course in some late-Georgian buildings in the vicinity (notably 24 Lincoln’s Inn Fields), these are generally on lavishly articulated buildings as opposed to plain terraces. On most of the plainer brick terraces in Bloomsbury a single top storey is often intended to be visually separated above a stringcourse or cornice to read as the final, attic, storey.
- 5.14 Another very unfortunate impact of the alteration to the height of No. 4 has been the loss of the historic height relationship between 4 and 2 Gate Street. This means that 2 Gate Street is now the last remaining element of the 18thC height of the street.
- 5.15 Contrary to the appeal decision on 4 Gate Street, it is considered that the impact of the implemented scheme has in fact been harmful to the character and appearance of the conservation area, and should not be used as a marker for appropriate development of No. 2. It is worth noting that the appeal decision for No. 4 stated that the preservation of symmetry between Nos. 2 and 4 was not relevant to the preservation of character and appearance. While officers fundamentally disagree with that assessment, it is considered that the reintroduction of symmetry (by reason of height) between Nos. 2 and 4 is not relevant to the preservation of character and appearance. The most appropriate manner to preserve character and appearance is to preserve the existing height of No. 2.
- 5.16 The proposed works would bring the height of No. 2 into line with that at No. 4. The effect of this would be to vitiate the last remaining vestige of the pre-19thC street height and to alter the height relationship with the listed buildings fronting Lincoln’s Inn Fields.
- 5.17 While it is noted that the extension to No. 4 was allowed on appeal, it is also noted that No. 2 Gate Street is a rather different site. No. 2 is an end-of terrace building, and is on a prominent corner site which can be read across three elevations and from a range of perspectives within the public realm. Therefore any increase in height here will be visible across three elevations, and will be more perceptible than the increase was at No. 4, which is mid-terrace and beside a much taller



Edwardian building.

- 5.18 Given the nature of the site and the location of the proposals, the public visibility of the alterations would be considerable and the character and appearance of the conservation area would be neither be preserved nor enhanced. There would also be some identified harm to the setting of listed buildings, particularly Nos. 1 and 2 Lincoln's Inn Fields, arising from the manner in which the proposals disrupt the historic scale-relationship between the two sites.
- 5.19 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (Act) requires special regard to be paid to the desirability of preserving the building or its setting. In addition, Section 72(1) of the Act requires that with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 5.20 The proposals do not preserve the extant setting of the listed buildings nearby, notably Nos. 1 and 2 Lincoln's Inn Fields. The proposed increase in height to No. 2 Gate Street causes harm to the character and appearance of the conservation area and does not preserve or enhance the positive contribution which the site makes to this part of the Bloomsbury conservation area. It is concluded that the harm which the proposal causes to the setting of the listed buildings and to the character of the conservation area is 'less than substantial' but there are no public benefits of an adequate nature to outweigh that harm to designated heritage assets. In accordance with the NPPF balancing exercise outlined in para 5.2 above, it is considered that this harm is not outweighed by any benefit and thus the scheme should be refused permission.
- 5.21 The proposals are therefore contrary to policies D1 and D2 of the Camden Local Plan 2017, and this forms a reason for refusal.

## **6.0 Amenity**

- 6.1 Policy A1 seeks to protect the amenity of Camden's residents by ensuring that the impact of development is fully considered and would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise, daylight and sunlight.
- 6.2 The closest properties which could be impacted by the development are the flats in no. 4 Gate Street, and nos. 1 and 2 Lincoln's Inn Fields.
- 6.3 The proposed extension would not extend beyond the existing rear building line and would extend no closer to the windows in the side/ rear elevation of no. 4 Gate Street. The fourth and fifth floors of no. 4 are occupied as a maisonette with a window fronting onto the rear elevation which appears to serve a dining room at fourth floor level and two skylights at fifth floor level that serve a bedroom. The existing building including its chimney breast at the rear would already affect daylight into the room at 4<sup>th</sup> floor level on the rear of no. 4 that serves a dining room. The proposal would not result in further harmful loss of daylight to this room. The skylight windows that serve the bedroom at 5<sup>th</sup> floor level at no. 4 slope back into the roof. The increased height of the chimney stack would not result in any further harmful loss of daylight to these rooms.
- 6.4 The proposal would include an additional storey at 4<sup>th</sup> floor level increasing the height of the side elevation by 3.8m. The rear elevation of no. 1 Lincoln's Inn Fields is blank with no window openings so the proposal would not have an adverse impact on this building in terms of daylight and sunlight. There are 2 sets of windows on each floor at the rear of no 2 Lincoln's Inn Fields at 3<sup>rd</sup> and 4<sup>th</sup> floor levels. The windows closest to the application site are bricked-in but may have served a stairwell or bathroom historically. The proposed extension would not extend beyond these bricked-up windows so would not have an impact on the daylight to the windows in the rear

elevation of nos. 1 and 2 Lincoln's Inn Fields.

- 6.5 The rear of nos. 1 and 2 Lincoln's Inn Fields includes a blank façade at 4<sup>th</sup> floor level. The proposal would not result in any loss of privacy to nos. 1 and 2 Lincoln's Inn Fields and would be considered acceptable. There are no windows in the rear elevation of the extension that would look directly into the windows in the adjoining flats at no. 4 Gate Street. A roof terrace would be created which would include a 1.8m high timber privacy screen that would obscure any views from the terrace into neighbouring windows. If permission were otherwise considered acceptable, a planning condition would secure the installation of the privacy screen to ensure there would be no overlooking from or into the terrace from the windows of neighbouring occupiers. The proposal would be considered acceptable in terms of privacy to neighbouring occupiers.

## **7.0 Transport considerations**

- 7.1 In line with Policy T1 of the Local Plan, the Council expects cycle parking at developments to be provided in accordance with the standards set out in the London Plan. For residential uses, the requirement is for 1 space per studio and 1 person 1 bedroom unit, 1.5 spaces per 2 person 1 bedroom unit and 2 spaces per all other units. There would be a requirement to provide 1.5 spaces here. Although the existing flats within the 1st to 3rd floors have a separate entrance to the rear of the building where there is a communal entrance way, there is not sufficient space within the building to accommodate a central ground floor cycle store. Given the onsite constraints, a cycle space can be provided in an onstreet bike hangar space. A financial contribution would be required to secure this. The cost of a bike hangar is £4,320, which provides 6 long-stay cycle parking spaces. This development would need to provide 1 space which is a total cost of £720. The financial contribution would be secured by s106 legal agreement. In the absence of an acceptable scheme, this would form another reason for refusal
- 7.2 In accordance with Policy T2 of the Local Plan, the Council would expect all development to be car-free. No off-street parking is currently provided and none is proposed. In line with policy T2, the new flat would be secured as car-free by means of a section 106 legal agreement. This will prevent the occupants of the new flat from adding to existing on-street parking pressures, traffic congestion and air pollution, whilst encouraging the use of more sustainable modes of transport such as walking, cycling and public transport. In the absence of an acceptable scheme (and hence no section 106 agreement) this forms a reason for refusal.
- 7.3 The extent of demolition and construction works proposed is relatively small scale and, although Gate Street and the surrounding streets are very narrow and minor disruption will be caused to the operation of the highway, there are only low traffic flows in this part of Holborn and this can be accommodated. A Construction Management Plan would not be required in this instance.
- 7.4 The Council's transport officer has confirmed that a highways contribution is not considered necessary in this instance as any damage that occurs to the adjacent footways will be covered by the scaffolding bond that is secured under a separate licensing scheme.

## **8.0 Energy and sustainability**

- 8.1 In line with policies CC1 and CC2, the Council will require development to incorporate sustainable design and construction measures. The development is classed as a minor development (less than 4 units or 500 sq.m new floorspace) so an energy statement was not required; however, performance against carbon reduction targets should be included in a sustainability statement, and development is expected to meet overall carbon reduction targets of 19% below Part L of

2013 Building Regulations. Renewable technologies should be incorporated where feasible.

8.2 No renewable technologies are proposed as part of the scheme. It is therefore not policy compliant. In 2019 the Council declared a climate emergency and it has made a commitment to make Camden a zero carbon Borough by 2030. Great weight has been given to the failure to meet even the most basic minimum requirements of policy and this forms an additional reason for refusal.

## **9.0 Water and drainage**

9.1 The existing site is built on hardstanding so offers little in the way of drainage. A sedum roof would be installed on the roof of the new mansard and would help to reduce water run-off in the area which is welcomed. If the proposal had been acceptable in all other respects, a condition would be have attached to condition the details of the sedum roof to ensure its soil depth and species types would help reduce surface water run-off.

9.2 All new build dwellings should achieve a maximum internal water use of 110 litres per person per day (this includes 5 litres for external water use). If the development had been acceptable in all other respects, this would have been secured by condition.

## **10.0 Conclusion**

10.1 In conclusion the proposed roof extension is considered unacceptable due to its height, bulk and detailed design which would compromise the form and integrity of the host building, causing harm to the character and appearance of the building, streetscene and this part of Bloomsbury Conservation Area, as well as to the setting of nearby listed buildings. Although the creation of a new home is welcomed, this would not outweigh the 'less than substantial harm' caused to the designated heritage assets, or the failure to mitigate and address climate change. As such, it is recommended that the application be refused. An additional reason for refusal is added relating to lack of a S106 for bike hangar contribution and car-free housing.