

Design & Access and Planning Statement

Site: 36-37 Great Russell St, London WC1B 3PP

Proposal: Change of use of part of the ground floor and 1st and second floors Class E uses and existing flat at third floor level into four self-contained flats. Provision of lift overhang and replacement of staircase hatch by larger one to existing main roof terrace. Relocation of two windows at the rear at first and second floor level. Provision of internal cycle storage and bin refuse at ground floor level.

1.0 Application Site and Location

The site is located in a mixed used area with shops, workplaces, entertainment and leisure facilities and other local amenities nearby which will reduce the need for travel.

The ground and basement levels are retail (A1) use; the first and second floors consist of B1 floorspace the third floor is residential.

The property lies within the Bloomsbury Conservation Area.

The site has a PTAL rating of 6b, with excellent access to public transport facilities (PTAL 6a), including three London Underground Stations in close proximity (Goodge Street, Tottenham Court Road and Holborn) as well as numerous bus routes

The site is located within an area where controlled parking measures are in place.

The site is located in a low flood risk zone.

2.0 Relevant planning history

Planning permission was granted 2nd March 2023 (planning ref: 2022/3001/P), for: *"Erection of rear extensions at basement to 2nd floor levels to provide enlarged retail space at basement and ground floor (as approved on 23/08/2016 ref 2016/2795/P) and two new self contained 1 bedroom flats at first and second floors with associated new internal lift; provision of communal cycle and refuse stores at ground floor; conversion of two 1 bed flats to one 2 bedroom flat on third floor; retention of existing office use at part 1st and part 2nd floors; creation of new roof terrace at rear 1st floor; replacement of staircase hatch by larger one to existing main roof terrace; and associated external fenestration alterations."*

Planning Permission (Ref: 2017/2149/P) was granted on 19/07/2018, for: *"Erection of rear extensions at basement to 2nd floor levels to provide enlarged retail space at basement and ground floor (as approved on 23/08/2016 ref 2016/2795/P) and two new self contained 1 bedroom flats at first and second floors with associated new internal lift; provision of communal cycle and refuse stores at ground floor; conversion of two 1 bed flats to one 2*

bedroom flat on third floor; retention of existing office use at part 1st and part 2nd floors; creation of new roof terrace at rear 1st floor; replacement of staircase hatch by larger one to existing main roof terrace; and associated external fenestration alterations"

3.0 Planning Proposal

This proposal is as follows:

- Loss of some commercial floor space at ground floor level to provide; cycle and refuse and recycling storage space and lift for upper floors
- Change of use of 1st and 2nd floors from commercial to 4 flats
- Conversion of 3rd floor from Two 1-bedroom flats to one 2-bedroom flat
- Provision of internal lift and staircase.
- Provision of communal roof terrace on the main roof.
- Replacement of staircase hatch by larger one to existing main roof terrace
- Provision of lift overhang
- Associated external fenestration alterations.

4.0 Relevant Planning Policies

Paragraph 10 of the National Planning Policy Framework Document (NPPF) (2019) states; *"So sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11)."*

Paragraph 11 of the NPPF states; *"Plans and decisions should apply a presumption in favour of sustainable development."*

Paragraph 111 states: *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

Paragraph 130 of the NPPF (2019) states: *"Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development..."*

Sections 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the Listed Buildings Act") requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area. The effect of this sections of the Conservation Area Act is that there is a statutory presumption in favour of the preservation of the character and appearance of Conservation Areas. A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations which sufficiently outweigh the harm caused.

The London Plan was adopted March 2021. The relevant policies for this application include:

GG2 - Making the best use of land. Part c of the policy states: *“Proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.”*

GG4 - Delivering the homes Londoners need. This policy reinforces the need to delivery more homes because the delivery of more homes is a strategic priority.

Policy SD6 - Town centres and high streets. This policy seeks to strengthen the viability and function of town centres. The policy promotes housing growth in such areas to help strengthen the viability and function of town centres.

Policy D3 - Optimising site capacity through the design-led approach. This policy seeks design led higher density development in sustainable locations.

Policy D4 - Delivering good design.

Policy D6 - Housing quality and standards

Policy H1 - Increasing housing supply. This policy sets new housing delivery targets for all London Boroughs. The annualised target for housing completions in Camden has been increased to 1,380.

Policy - H2 Small sites. This policy states that small site housing developments will be the strategic priority to deliver housing. Part A of the policy states that *“small sites should play a much greater role in housing delivery...”* Part B, 1, recognises that planning decisions should accept that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments. The policy also includes a new housing delivery target solely for the number of dwellings approved for applications of small sites. The annualised target for housing completions set for Camden is 328 dwellings per annum.

The London Plan Housing SPG (2016) is also a material consideration.

Camden’s Local Plan was adopted 2017. The **relevant policies within Camden Councils adopted Local Plan include:**

A1 – Managing the impact of development

D1 – Design

D2 – Heritage

E2 - Employment premises and site

G1 – Delivery and location of growth

H1 – Maximising housing supply

H4 – Maximising the supply of affordable housing

H6 – Housing choice and mix

H7 – Large and small homes

T1 – Prioritising walking, cycling and public transport

T2 – Car-free development and limiting the availability of parking.

Camden Council have also adopted the following planning guidance:

- Design (2019)
- Amenity (2019)
- Housing (2019)
- Transport (2019)
- Camden Town Conservation Area Appraisal and Management Strategy

5.0 Planning Assessment

The main planning considerations are:

- Principle of losing existing commercial floorspace.
- Impact on the character and appearance of the property and conservation area
- Impact on neighbouring amenity
- Standard of accommodation
- Affordable housing provision
- Accessibility
- Highway matters
- Refuse
- Other material considerations

6.0 Principle of losing existing commercial floorspace.

Policy E2 (Employment premises and sites) seeks to protect employment premises or sites that are suitable for continued business use.

In line with Policy E2 the applicant has provided marketing evidence demonstrating the premises is no longer suitable for its existing business use and the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.

The marketing evidence dated 7th June 2023 from Ian Scott International stated as follows:

“The property was on the market to rent by our agency from 08/11/2022 and details widely circulated both on major commercial property web portals including EACH as well as on our own website. The availability of this office space was sent out to over 500 other commercial agents.

The property was marketed on both a whole or split level basis seeking on average rents in the order of £27.50 per sq ft overall.

The amount of interest generated was disappointing and to date we have received less than 12 enquiries with no offers made.

Our opinion on why the property did not rent is a combination of factors including the availability of more suitable office suites nearby; the condition and unsatisfactory internal layout of the individual floors and the general economic uncertainty and change in work patterns arising from the pandemic including ‘work from home’ & much reduced office space requirements.”

The marketing evidence dated May 2023 from “Robert Irving Burns” stated the following in the executive summary:

“Robert Irving Burns have been involved with this development since February 2022. We were instructed to sell 36 and 37 Great Russell Street on behalf of the landlord. As part of our marketing, we targeted various prospective purchasers including the likes of owner occupiers, investors and developers and businesses to rent the premises. Approximately 24 months prior to our involvement, the property was available on the market ‘For Sale’ and ‘For Rent’ with two other Agents. The property failed to sell or to let during this period. This was primarily due to an abundance of Class E accommodation being available that was more in line with current commercial occupiers needs and requirements. The lack of passenger lift has in our opinion been a significant factor, meaning that DDA requirements could not be fulfilled. The existing retail and office (Class E) floor space is 485sqm.

According to the vendor, a robust and extensive marketing effort was conducted on both nationwide and full London level, targeting various potential buyers and companies/individuals who were looking to rent office space using a detailed brochure, in addition to advertisements and national exposure through a range of property platforms available in the public domain. After numerous inspections, however, the landlord was unable to bring the sale to a successful conclusion. Robert Irving Burns pro-actively targeted numerous local occupiers & commercial agents who had active property requirements in the area.

We were not able to generate any occupier interest due to the small floor plates and lack of lift.

We did encounter several investors who thought the ground and basement of the buildings would work as commercial use, but not the upper floors. Following the introducing of

Commercial Use Class E in September 2020, we envisage a variety of users who would take the opportunity to occupy part ground floor and part basement.”

The marketing evidence dated 26th May 2023 from Sq. One Real Estate stated as follows:

“The property was on market (sale/rent) by our agency between 14th April 2021 – 1st February 2022. The property was marketed at the price of £4,950,000 and for rent at £30 per Sq ft. The amount of interest generated was limited and over the time period we had 42 viewings but no offers were made.

Our opinion on why the property did not rent/sell was due to a number of factors from COVID 19, a lack of overall belief in the PCL property market and the configuration of the property not being suitable for offices. There was also nervousness around the mixed use nature within the building in such a small development.”

The proposal would see a small less than 9% reduction of the ground floor and basement commercial space from 272sqm to 248sqm. However, the resultant floorspace is superior and useable than the existing floorspace. This means the proposal would ensure the resultant commercial floorspace is more viable to an end user than the existing position. The small loss of commercial floor space also provides the following additional benefits:

- Internal refuse, recycling and cycle storage.
- Improved internal accessibility, including provision of a lift.

7.0 Impact on the character and appearance of the property and conservation area

The property lies within the Bloomsbury Conservation Area.

Two windows are proposed to be relocated at the rear and will improve the character and appearance of the property.

The proposed lift overrun will be set back from both front and rear and will be below the perimeter parapet heights, thus it will be not visible at all from the street due to sightlines.

8.0 Impact on neighbouring amenity

No extensions are proposed.

The main building’s roof terrace is existing and accessed by a narrow steep staircase hatch. This will be replaced by a proper staircase within a longer hatch to meet building regulations and a lift, to make the terrace more accessible. The parapets are high enough to not require additional perimeter enclosures. There will be no increase in overlooking from this retained terrace.

This means therefore the proposal would have no demonstrable impact on neighbouring amenity.

9.0 Standard of accommodation

Flat A is a 1b, 2P dwelling providing 50sqm of floorspace – single aspect east facing.

Flat B is a 1b, 2P dwelling providing 50sqm of floorspace – single aspect east facing.

Flat C is a 2b, 4P dwelling providing 84sqm of floorspace – dual aspect.

Flat D is a 3b, 4P dwelling providing 84sqm of floorspace – dual aspect.

Flat E is a 3b, 4p dwelling providing 84sqm of floorspace – dual aspect.

All flats will have access to the communal amenity space on the roof (85sqm).

It should be noted that the existing two flats on the 3rd floor are lawful by virtue of being there for over 4 years and since the late 1980's. These two substandard units will be converted to provide a quality 2b, 4P dwelling providing 84sqm of floorspace.

The application documents include a light report. I refer to this report which justifies the light levels received in each room.

Most parts of the open plan living/kitchen areas of the 1st and 2nd floors meet the minimum SE standards for sunlight - daylight is more important than sunlight which is reflected in the Prior approval criteria which only requires adequate light (not sunlight). It should also be noted that the window areas of the four windows serving each of the open plan kitchen/living room areas for the north facing rooms contain a large ratio of window areas to floor space being provided.

10.0 Affordable housing provision

The proposal will provide affordable housing contributions in compliance with the Councils planning policies.

11.0 Accessibility

Access to the site and the residential units on the upper floors from the street would be improved with one central residential core served by a lift.

The design will retain the existing access for Emergency Services from Bloomsbury and Great Russell Street.

The residential units will be compliant with Part M4(2) of the Building Regulations – discretionary accessibility standards.

12.0 Highway matters

The site is located in a mixed used area with shops, workplaces, entertainment and leisure facilities and other local amenities nearby which will reduce the need for travel.

The site has a PTAL rating of 6b, with excellent access to public transport facilities (PTAL 6a), including three London Underground Stations in close proximity (Goodge Street, Tottenham Court Road and Holborn) as well as numerous bus routes.

The development (which would result in the net increase of three residential units within the building) is proposed to be “car free” with a restriction of future residents applying for parking permits, which can be secured via S106 legal agreement.

Secure cycle storage for eight cycles will be provided at ground floor level.

13.0 Refuse and recycling provision

The refuse and recycling store has been provided at ground floor for the new flats. The proposed refuse storage will be in accordance with the CPG1 DESIGN Storage and collection of recycling and waste, as indicated in the table below.

COMMUNAL REFUSE / RECYCLING STORAGE		
	Contained Flats	Proposed storage
General Waste	5 Dwellings	2 x 240L & 1 x 140L Wheeled Containers
Mixed Recycling	5 Dwellings	2 x 240L & 1 x 140L Wheeled Containers
Food Waste	5 Dwellings	5 x 23L Caddy

14.0 Other material considerations

The provision of three additional dwellings (five meeting minimum space standards) will help deliver much needed housing of which there is a known shortage in the borough.

The adopted London Plan (published March 2021) is an additional material planning consideration.

Policy H1 sets new housing delivery targets for Camden.

Policy H2 states that small site housing developments will be the strategic priority (paragraph 4.2.1) to deliver housing. Part A of the policy states that “small sites should play a much greater role in housing delivery...” Part B, 1, recognises that planning decisions should accept that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments. The policy also includes a new housing delivery target solely for the number of dwellings approved for applications of small sites.

The proposal ensures an efficient use of brown field land in compliance with sustainability policies.

Therefore, significant weight should be afforded to the provision of three much needed additional dwellings (five meeting minimum space standards), in a sustainable location.