



Camden Planning Department

7-May-24

Dear Sir/Madam,

Re: 36-37 Great Russell Street, London, London, WC1B 3PP: Change of use of part of Ground floor (Class E) to a (C3) unit under Class MA of the Town and Country Planning, England, (order 2021)

1. The site

The site is located on the southern side of Great Russell Street, close to the junction with Bloomsbury Street and to the south of the British Museum.

It comprises a four storey building plus basement.

There are a variety of uses within the vicinity of the site including offices units at ground floor level, and residential on the upper floors of buildings and cultural uses in close proximity.

The site lies within the Bloomsbury Conservation Area and an Archaeological Priority Area as well as being within the London Plan Central Activities Zone (CAZ).

2. Proposal

The proposal relates only to the rear part of the Ground Floor.

This Prior Approval application is for converting the existing vacant retail space (Class E) into 1 no. residential unit (Class C3).

By converting the vacant retail space (Class E) into a new residential unit, the entire rear parts of the property will have a coherent use as a residential building- all units to enter via No. 36.

This application relates mainly to internal alterations, all designed to further improve the appearance and to add consistency across the building. As such, no additional structures are proposed to be erected to safeguard against any adverse effect on the character of the building or the area.

Transport

a) transport impacts of the development, particularly to ensure safe site access;

Currently, the main entrance from No.36 to the upper floors and the entrance to the Retail Unit (Class E), are via the front of the building through separate doors.

The proposal is for the new residential unit to use the existing dedicated entrance to the upper floors. By using the existing entrance, we are ensuring a safe site access directly from the pavement. Therefore, no changes are proposed to access the site.

None of the previously approved residential units in the upper floors of the building have car parking. There is no car parking provision in the site.

The existing Retail Unit (Class E) can accommodate approx. 12-20 employees, plus customers. However, for the last year the commercial space has been vacant.

The proposed residential dwelling is expected to have a maximum occupancy of 1 person, being a 1-person unit. This will reduce the potential traffic generated by the development when compared to the existing use.

The application site is in a good central location with a PTAL rating of 6b, the best possible rating. Given the site's proximity to local services and public transport links in the area, it is considered the proposed arrangement would be in accordance with the current London Plan and the NPPF 2019.

It is considered that the proposed change of use is unlikely to generate unacceptable levels of additional traffic.

In terms of car parking the revised NPPF in matters of sustainable development, transport and car parking advises at paragraph 105 that:

"105. If setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;*
- b) the type, mix and use of development;*
- c) the availability of and opportunities for public transport;*
- d) local car ownership levels; and*
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultralow emission vehicles."*

Importantly, Paragraph 109 of the Framework advises that:

"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"

In terms of the use of parking standards paragraph 106 of the revised NPPF states:

“106. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). “

The site is within walking distance to local Underground Stations, a local Santander Cycling rental station, as well as being well served by several local buses. Considering this, we believe this is a compelling case for a car-free development that we would like to encourage.

To improve the sustainability of the proposed development it is proposed to include secure cycle parking within the proposed flat, as indicated on the submitted plans.

Considering all the above, we therefore maintain that there are no material issues relating to the proposed change of use on matters of Transport.

Contamination:

(b) contamination risks in relation to the building;

The rear office at the Ground floor, was used as Class E till approx. a year ago.

There are no proposed any alterations to the floor, other than internal alterations.

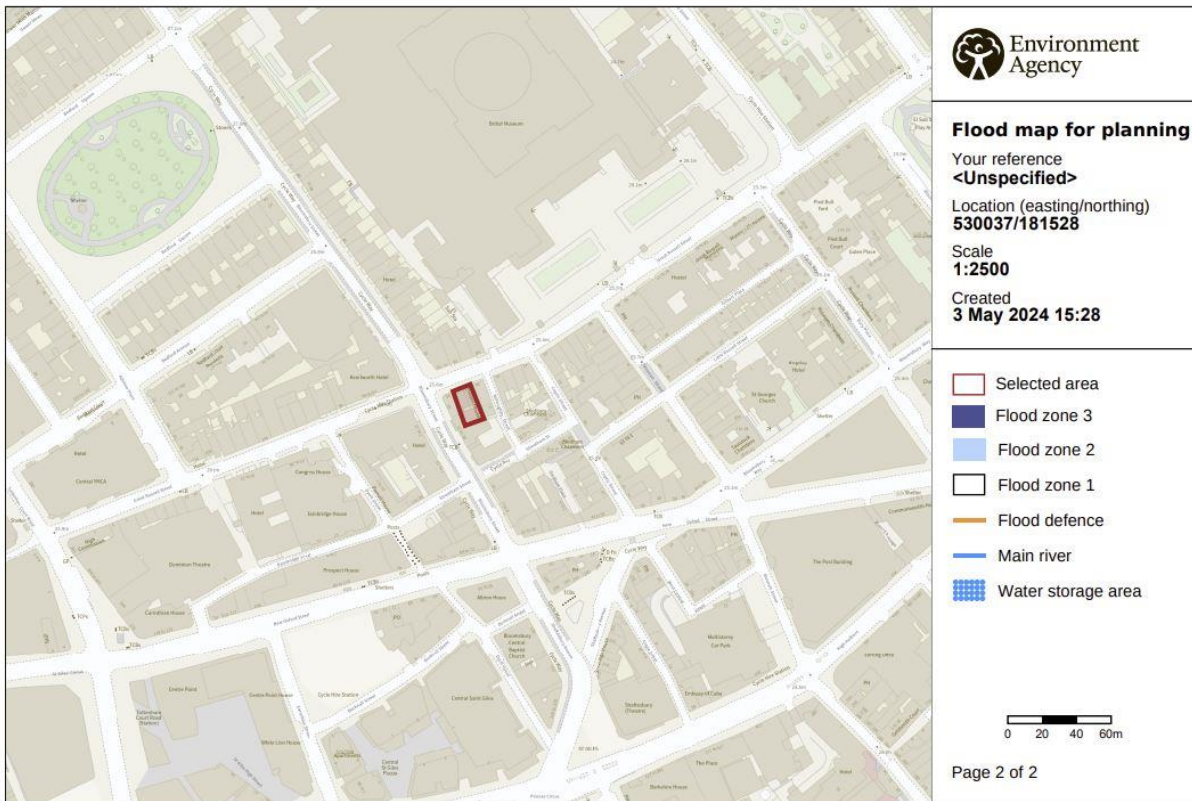
It is therefore considered highly unlikely to expose any soils that may contain contaminants of concern presenting a risk to human health.

We maintain that there are no material issues relating to the proposed change of use on matters relating to Contamination.

Flooding:

c) flooding risks in relation to the building;

The site is not in Flood Zones 2 or 3. The application site is in Flood Zone 1 and have a low probability of flooding. See attached copy of the Environment Agency Map and submitted report.



© Environment Agency copyright and / or database rights 2022. All rights reserved. © Crown Copyright and database right 2022. Ordnance Survey licence number 100024198.

In this regard and given the overall size of the site, it is considered that there would be no requirement to undertake a flood risk assessment.

In light of the above, it is considered that there are no material issues relating to the change of use proposed on matters of flooding.

Noise:

d) impacts of noise from commercial premises on the intended occupiers of the development;

Considering that the proposed unit is at the rear of the site and enclosed by other residential properties, and there are no commercial premises near the application site, and the host building all with residential use above and around, it is considered that there are no material issues relating to the proposed change of use in regards to noise affecting future residents.

It is therefore considered that there are no material issues relating to the change of use proposed on matters of Noise.

Natural light:

f) the provision of adequate natural light in all habitable rooms of the dwellinghouses;

Please see attached Daylight Report confirming acceptable levels in all proposed habitable rooms.

Impact of residential use in heavy industry area:

g) the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses;

The specific site at the rear, is located in a quiet area which is predominantly residential. Some of the buildings in the immediate area on the road are fully residential facing the road, with residential units at ground level. There are no heavy industry or distribution facilities in the immediate neighbourhood.

Considering the above, it is considered that there are no material issues relating to the proposal in this regard.

Impact on character or sustainability of the conservation area:

The Existing/Proposed area at the rear of the ground floor used before as Class E will be retained, without external alterations.

The main entrance from no.36 leads to all flats as well as to the proposed unit.

The character will not be affected, while the existing structure will be upgraded to meet current Building regulations and be sustainable for Energy and small site land use.

Considering the above, it is considered that there are no material impact relating to the proposal in this regard.

We attach to this cover letter all relevant documents for this type of application, for your review. We remain available if you need to contact us with any queries.

Kind regards,

Yossi Shahar
Director
Tal Arc Ltd.