

## DESIGN AND ACCESS STATEMENT

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

Proposal: Change of use of rear part of the ground floor Class E uses into one self-contained flat and alterations to lower ground. Provision of internal cycle storage and bin refuse at ground floor level.

### 1. **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 rear of No. 36-37 are currently under construction to form new residential units. Main building at first, second & third floors are also under construction to be converted into residential Class C3.

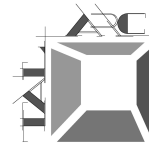
The property lies within the Bloomsbury Conservation Area. The site has a PTAL rating of 6b, with excellent access to public transport facilities (PTAL 6a), including three London Underground Stations in close proximity (Goodge Street, Tottenham Court Road and Holborn) as well as numerous bus routes. 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. **Relevant planning history**

Planning permissions were granted on 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."*

And 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"*.



Planning permission was granted on 10.04.24 (planning ref; 2023/2864/P) for:  
*“Extension to existing basement at rear; erection of reconstructed ground floor rear extension.  
Creation of new rear lightwell.”*

A recent new planning application (Ref: 2024/1755/P) following a Pre-application advice, was submitted for 3<sup>rd</sup> floor rear extension to create a Studio flat and is currently under consideration.

### 3. Planning Proposal

This proposal is as follows:

- a. Change of use of rear of ground floor (previously used as Storage / ancillary (Class E), into 1No. self-contained oversized Studio flat, with lightwell and Green living wall,
- b. Proposed Self contained Studio will meet the Approved Document Part M for Wheelchair disability M4(3).
- c. The new Studio will benefit from the communal Roof terrace as approved before.
- d. Enlargement of Cycle, Refuse, and recycle storage to meet requirements,
- e. Unify the Class use of the building- upper floors and new extensions are all Class C3, save for Ground and Basement floors (Class E).
- f. Internal alteration to basement,

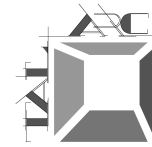
### 4. Relevant Planning Policies

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.”*

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 deliver 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.

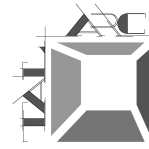
**Policy - H2 Small sites.** This policy states that small site housing developments will be the strategic priority to deliver housing. Part A of the policy states that “small sites should play a much greater role in housing delivery...” Part B, 1, recognises that planning decisions should accept that 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.

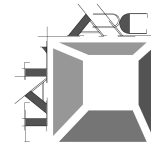
Camden Council have also adopted the following planning guidance:

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

## **5. 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. Principle of losing existing commercial floor space**

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

The subject floor space at the rear of ground floor (Class E) was used as ancillary Storage to the offices in the whole building.

As per recent approved planning consents, the majority of the building will operate as Class C3 residential.

The applicant aims to retain the Class E at street level.

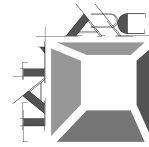
In line with Policy E2 the applicant has provided previously marketing evidence demonstrating the market needs.

Accordingly, an update to the Marketing report is attached.

It is worth mentioning that the Storage premises at the rear of Ground floor, used by all floors offices, is no longer suitable for its existing business use (only Ground and basement floors) 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 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.”*

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 at the rear, also provides the following additional benefits:

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

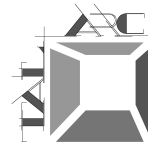
## **7. Impact on the character and appearance of the property and Conservation area**

The property lies within the Bloomsbury Conservation Area.

The windows recently approved in planning permission (planning ref; 2023/2864/P) for the ground and basement floors will meet and fit the requirements for Daylight and Sunlight for the proposed new self-contained Studio.

The proposal includes a Green wall at the Lightwell.

Same as the other approved flats at the rear, the new Studio will not be visible at all from the street due to sightlines.



## **8. Impact on neighbouring amenity**

No extensions are proposed.

The main building's roof terrace as approved previously.

Same as previously approved for the other flats, 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. Standard of accommodation**

The proposed Studio flat will be for one person, providing 53sqm of floorspace, Single aspect East facing. The open plan Studio unit will face a large Living Green wall.

The Studio unit positioned at the rear will provide quiet/relaxed environment for future tenant while benefit from good Daylight and views towards the Living Green wall.

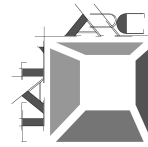
Proposed flat will have access to the communal amenity space on the roof (85sqm).

application documents include a Daylight report.

It should also be noted that the window areas serving the open plan kitchen/living room areas for the East facing rooms contain a large ratio of window areas to floor space being provided.

## **10. Affordable Housing provision**

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



## **11. Accessibility**

The proposed 1No. residential unit will be compliant with Part M4(3) of the Building Regulations, Part M.

Access to the site and all the residential units on the upper floors from the street would be from no. 36, while retaining the access to retail from No. 37.

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

## **12. Highways considerations**

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 one residential unit within the building) is proposed to be “car free” with a restriction of future residents applying for parking permits, same as agreed for the other residential units. this can be conditioned.

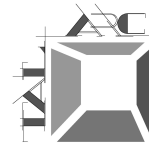
Secure cycle storage included in the Studio flat layout, as well as eighteen cycles will be provided at ground floor level.

## **13. Refuse and Recycling**

The refuse and recycling store has been provided at ground floor for the new flats. An additional 23Li Food waste is also indicated in the kitchen, on the Studio layout.

The proposed refuse storage will be in accordance with the CPG1 DESIGN Storage and collection of recycling and waste, as indicated in the table indicated on the submitted Drawings.





**14. Other material considerations**

The provision of One additional dwelling (Oversized and 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...”

Residential Design Standards		
Overall	Overall	Overall
Overall	Overall	Overall
Overall	Overall	Overall
Overall	Overall	Overall

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 One, much needed additional dwelling, in a sustainable location.