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Private and confidential. For the attention of Harjeet Suri,

Site: 8 Fulwood Place, London. WC1V 6HG.

Pre-app advice sought: Change of use at Ground and upper floors from Office (Class E) to 4 new self-contained residential units (Class C3), also with retention of the existing basement in commercial use (Class E). Alterations to ground floor front to provide new access to basement and new access to proposed residential lobby.

Site visit: 22/12/2023.

Site History:

8900677 - Refurbishment of existing building involving additional mansard floor extension to rear of 1st 2nd and 3rd floors and new shopfront as shown on drawing numbers M5065/001 & 002. **Granted 26/06/1990.**

2010/2708/P - Erection of rear extensions at ground, first, second and third floor level, erection of glazed roof extension and refurbishment of existing front entrance including new glazed doors at existing office building (Class B1). **Granted 03/08/2010.**

2023/2874/P - Prior Approval application under Schedule 2, Part 3, Class G of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) in relation to the

change of use of a building falling under Use Class E into a mixed use (namely; Class E at ground and basement floors, and 2 flats Class C3 at upper floors). **Withdrawn 25/07/2023.**

Site Description:

The host property is a narrow commercial building (Class E) on the East side of Fulwood Place. The building has six floor levels including basement, all of which are currently in office use but vacant. The site is positioned within a terrace of other commercial buildings which form a small pedestrian mews off High Holborn and lead towards 'The Walks' gardens via a gated access point.

The front façade has well-proportioned traditional appearance, with a more modern canopied main entrance at ground floor level. There are light-bricks to the floor of the small front forecourt illuminating the basement level below. Existing signage is in place at fascia level. The first, second and third floor rise immediately providing a flat frontage with the fourth floor set back behind the parapet. The fenestration is double glazed metal framed and blue in colour.

To the rear at ground floor, the arrangement of existing buildings is very close knit with neighbouring windows looking towards each other and some fire escapes and existing plant are visible. At fourth floor the host building is set back creating a small terrace accessed via sliding patio style doors and enclosed by glazed balustrading. It is noted there appear to be some existing residential uses at upper floors to the neighbouring rear properties with roof terraces and associated paraphernalia being visible.

The property is not listed, but is located within the Bloomsbury Conservation Area and noted as making a positive contribution to the character and appearance of the area.

Other constraints:

Archaeological Priority Area (Tier II)

Article 4 Direction (Basements) & (E to C3 CAZ KQ)

CIL Charging Zone

CMP Priority Area

Strategic Views

TFL Underground Zone of Interest

Underground development (Subterranean groundwater flow & Slope stability)

Relevant Policies and Guidance:

National Planning Policy Framework 2023

The London Plan 2021

Camden Local Plan 2017

A1 Managing the impact of development

D1 Design

D2 Heritage

H1 Maximising housing supply

H4 Maximising the supply of affordable housing

H6 Housing choice and mix

E1 Economic development

T1 Prioritising walking, cycling and public transport

T2 Parking and car-free development

Camden Planning Guidance

Amenity (2021)

Design (2021)

Home improvements (2021)

Employment sites and business premises (2021)

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

Proposal:

The development would involve external alterations to the front façade at the ground floor entrance, with a part change of use and associated internal alterations. The pre-app proposal does not involve any extension to the building. The details of the proposed conversion/ retention at each floor level are set out in the table provided by the applicant below:

Level	Type	Number	Area	
			m2	sqft
Basement	Commercial	1	65.25	702.09
GF	Commercial		1.50	16.14
GF	Lobby	1	9.30	100.07
GF	studio	1	37.80	406.73
1st	1-bed flat	1	50.00	538.00
2nd	1-bed flat	1	50.00	538.00
3rd - 4th	2-bed flat	1	84.00	903.84
			297.85	3,204.87

(Pre-app HS Design Architecture Planning Interior 01/11/2023, page 2).

A site visit was undertaken with the applicant 22/12/2023, at which time it was discussed that the proposed ground floor studio would in all likelihood be refused. It would be unsuitable given the limited outlook and poor natural light it would receive. It was suggested that were an application to

be submitted for conversion of the upper floors, then both the basement and ground floor should remain in commercial (non-residential) use, or could potentially become ancillary to the residential use, but should not be in habitable use.

This variation to the proposals would affect the design of the floor plans and main entrance and would impact on the overall scheme. Therefore pre-app advice provided is in general terms.

General assessment:

The main planning considerations in the assessment of an application for planning permission in relation to this pre-app would be as follows:

- Land use including loss of employment space and housing provision
- Housing
- Design and Heritage
- Amenity
- Transport
- Sustainability

Loss of employment space:

Policy E2 (Economic Development) of the Local plan states, the Council will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy.

The Council will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction:

- a. the site or building is no longer suitable for its existing business use; and
- b. that 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.

When assessing proposals that involve the loss of a business use to a non-business use we will consider whether there is potential for that use to continue. The Council will take into account various factors including:

- the suitability of the location for any business use;
- whether the premises are in a reasonable condition to allow the use to continue;
- the range of unit sizes it provides, particularly suitability for small businesses; and
- whether the business use is well related to nearby land uses.

In addition to the considerations above, where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use. The applicant must submit evidence of a thorough

marketing exercise, sustained over at least two years. The premises should be marketed at realistic prices, include a consideration of alternative business uses and layouts and marketing strategies, including management of the space by specialist third party providers.

Housing:

All new proposals involving the provision of new Housing should be designed having regard to:

- Relevant policies throughout the Plan, particularly Protecting amenity, Design and Heritage, Sustainability and climate change and Transport;
- our supplementary planning documents, known as Camden Planning Guidance, particularly Camden Planning Guidance on Design, Housing, Sustainability, Amenity, and Transport;
- Supplementary planning guidance (SPGs) issued by the Mayor of London; and
- Building for Life - the industry and government endorsed standard for well-designed homes and neighbourhoods

Policy H1 (Maximising Housing Supply) notes that provision of self contained housing is the priority land use of the local plan. It also states; where vacant or underused sites are suitable for housing in terms of accessibility and amenity, and free of physical and environmental constraints that would prevent residential use, we will expect them to be redeveloped for housing unless:

- the Plan seeks to protect existing uses on site, such as business premises, community uses and shops;
- the site is needed to meet other plan priorities for the area, particularly in the Hatton Garden area and other parts of Central London;
- the site is identified for another use in our development plan documents; or
- it is demonstrated to the satisfaction of the Council that a housing development would not be financially viable.

Affordable housing

Policy H4 indicates that where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing. Please refer to the CPG Housing for information on calculating payments in lieu of affordable housing. An affordable housing contribution would be secured via a s106 legal agreement.

Acknowledging the issues with the layout of the ground floor studio, the proposed units would meet the nationally described minimum space standards in terms of floor area as shown on the applicant's table above. The proposed upper floor units would be dual aspect with windows to both front and rear. There would be no outdoor amenity space to the units at lower floors, but the proposed duplex 2 bed flat at 3rd and 4th floor would benefit from the rear roof terrace.

Design and Heritage:

The Council's Policy D1 (Design) aims to ensure the highest design standards for developments and states that the Council will require all developments to be of the highest standard of design and to

respect the character, setting, form and scale of neighbouring buildings and the character and proportions of the existing building. Policy D2 (Heritage) states that to maintain the character of Camden's conservation areas and listed buildings, the Council will not permit development within the conservation area or for listed buildings that fails to preserve or enhance the character and appearance of that conservation area and the special interest of the listed building.

As noted above, discussions on site suggested that the overall scheme would need to be re-considered in terms of the design approach.

It is acknowledged that the submitted details propose limited interventions to the external appearance of the host property. The main alterations would be at the main entrance to the ground floor frontage, however with retention of the ground floor as commercial space the design of the front entrance and lobby arrangement would need further consideration.

Amenity:

The Council's Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. Policy A1 seeks to ensure that development protects the quality of life of occupiers and neighbours by stating that the Council will only grant permission for development that would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise and impact on daylight and sunlight.

As discussed on site, the constraints of the surrounding properties, particularly at the rear (but also to the front) gives rise to concerns regarding amenity. The close proximity of neighbouring windows would appear to have negative impacts on privacy and outlook. Were an application to be submitted for conversion to residential use, the Council would expect appropriate daylight/ sunlight assessments to be provided for each new unit, but would also expect full details of any impact on neighbouring privacy to be fully demonstrated.

Whilst on site, it was apparent that proposed future occupiers may have their privacy compromised by the proximity of existing windows. As discussed this is not so much of an issue where commercial windows face each other, however where residential uses are proposed to be introduced, this need to be fully considered. This would need to be demonstrated by providing scaled drawings showing lines of sight to and from any relevant windows.

Transport:

Local Plan Policy T1 (Prioritising walking, cycling and public transport) expects cycle parking at developments to be provided in accordance with the standards set out in the London Plan. It is welcomed that cycle storage is shown on the plans provided, however as noted on site, is likely that the design layout would need to be adjusted. As discussed, vertical stands as shown are not preferred.

Policy T2 (Parking and car-free development) would apply to any new residential units. This would be secured by S106 agreement should an application be successful. This would prevent the future occupants 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.

Sustainability/ biodiversity:

Whilst not included in the submitted drawings, it was noted on site that the property benefits from flat roof and may be suitable for either solar panels or a biodiverse roof covering (or a combination of the two). Should these installation be proposed, details would need to be provided including roof plans, section drawings and installation and maintenance schedules as appropriate.

With regards to refuse and recycling, you are advised to design in adequate facilities for recycling and the storage and disposal of waste. Further information can be found in CPG Sustainability. Camden Local Plan Policy CC5 (Waste) and CPG (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables are provided in all developments. Any proposal should demonstrate that the development would include facilities for the storage and collection of waste and recycling – this may be evidenced through the provision of a Waste Management Plan.

Conclusion:

The proposed conversion of the office spaces at upper floors would need to be supported by adequate marketing evidence. Given the issues highlighted on site with regards to the proposed ground floor arrangement, and the associated requirement for alteration to the design of the entrance and lobby it is not possible to give firm advice on the principle of conversion, however I would note the issues raised above would need to be addressed in order for a change of use to be considered acceptable. As the ground floor as proposed is not considered suitable for a residential studio, it may be possible to utilise this space to improve overall living arrangements for proposed residence at upper floors, i.e.) improved cycle and waste storage arrangements, along with additional storage for day to day use.

An application for formal planning permission would need to be supported by the following information:

- Application form (+ fee)
- Site Location Plan
- Existing drawings
- Proposed drawings
- Design and Access Statement
- Marketing evidence (2 years minimum)
- Transport Statement (cycle storage and confirmation of car-free)
- Waste Management Plan (commercial and residential)

An application would be subject to public consultation and direct consultation with the local conservation area advisory committee in addition to Council officers.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above, please contact Matthew on 020 7974 3862 or e-mail matthew.dempsey@camden.gov.uk.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Matthew Dempsey
Senior Planning Officer