

Design & Access and Planning Statement

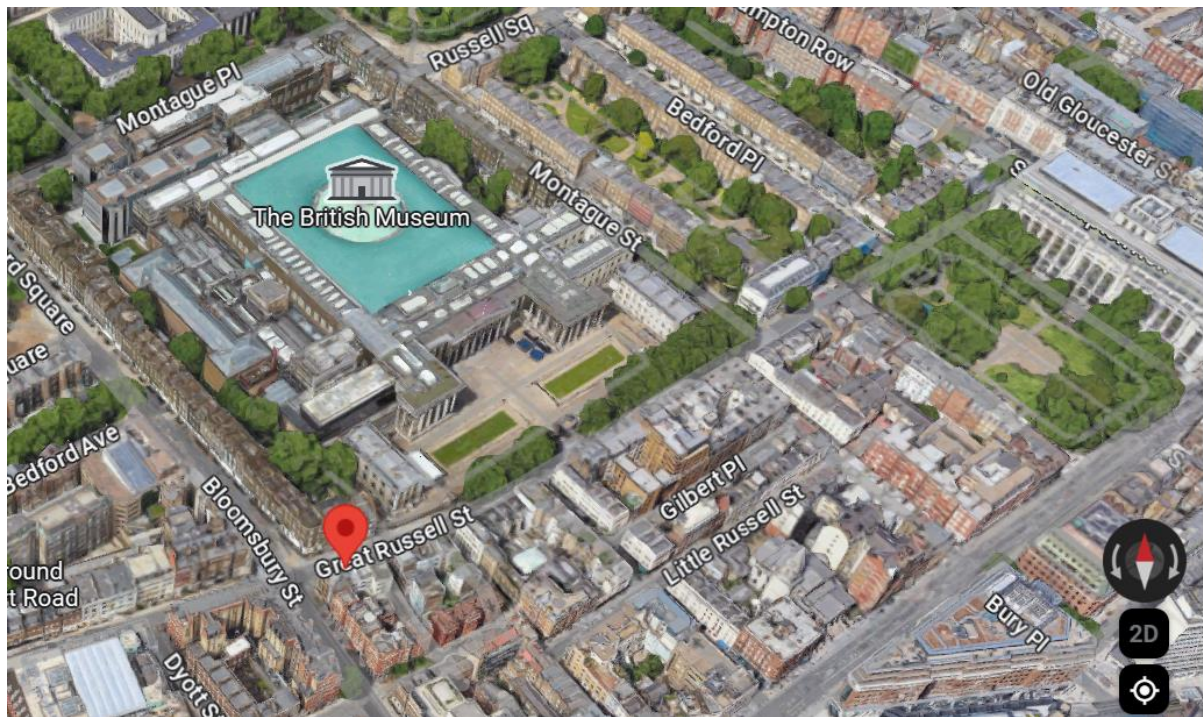
Site: Offices And Premises At Unit 5 Ground Floor 37 Great Russell Street London Camden WC1B 3PP

Proposal: Change of use of part of the basement and ground floor from Class E (office) into short-term letting accommodation with associated external alterations.

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.

The site is located very close to the British Museum, as demonstrated by the image below.



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 refused 18 October 2024 (Application ref: 2024/3047/P), for: *“Proposed change of use of part of the ground floor from Class E (office) to Class C3 (residential) with associated external alterations.”*

Reasons for Refusal:

“1 The proposed development has failed to demonstrate that the rear of the ground floor is no longer suitable for business use. The proposal would result in the loss of a business use contrary to policy E2 (Employment premises and sites) of the Camden Local Plan 2017.

2 The proposed development would result in substandard units of accommodation, providing poor quality of light, outlook, natural ventilation and proposing a single aspect unit. The proposal would therefore be contrary to D1 (Design) and H6 (Housing Choice and Mix) of the Camden Local Plan 2017.

3 The proposed development, in the absence of a legal agreement securing an affordable housing contribution, would fail to maximise the supply of affordable to meet the needs of households unable to access market housing, contrary to policy H4 (Maximising the supply of affordable housing) of the Camden Local Plan 2017

4 The proposed development, in the absence of a legal agreement securing car-free housing, would contribute unacceptably to parking stress and congestion in the surrounding area and fail to promote more sustainable and efficient forms of transport and active lifestyles, contrary to policies T2 (Parking and car-free development) and DM1 (Delivery and monitoring) of the Camden Local Plan 2017.”

3.0 Planning Proposal

Change of use of part of the basement and ground floor from Class E (office) into a 2-bedroom short-term letting unit, with associated external alterations.

The proposal is car free and will provide a cycle parking space within the hallway of the proposed unit.

4.0 Planning Assessment

The main planning considerations are:

- Principle of losing existing commercial floorspace
- Principle of providing short term lets in this location
- Impact on the character and appearance of the property and conservation area
- Impact on neighbouring amenity
- Standard of accommodation
- Highway matters
- Refuse

- Other material considerations

5.0 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 application is supported by significantly more marketing evidence than the previous application – please refer to:

- Great Russell Marketing Report
- Ian Scott Marketing Letter
- Retail for Lease _ LoopNet UK
- Serviced offices advertising
- Square One - Marketing Letter

In a recent meeting between the applicant and Kristina Smith, with Henry Young present, I am advised that Kristina Smith was content that the additional marketing evidence would be sufficient to justify the loss of the commercial space at the rear.

It is the applicant's case that there is little to no demand in the market for larger commercial units. The preference in this locality is shifting toward smaller commercial spaces, which are more economically viable and align better with the hybrid remote/home working trend.

Additionally, it is important to note that the extension and commercial floorspace proposed for a change of use was approved under a previous application (2023/2864/P). This is important because this space was never used as commercial floor space.

6.0 Principle of providing short term lets in this location

The provision of tourist accommodation in this location is supported by policy E3 of the Local Plan.

The site, whilst outside a Town Centre, is located very close to the British museum so will attract limited numbers of specialist visitors in compliance with Part c. of Policy E3 which states the Council will: [“consider tourism development outside of the areas listed above \(town centres\) where it would have a local or specialist focus and would attract limited numbers of visitors from outside the borough.”](#)

The site has excellent access to public transport, as indicated by the highest possible PTAL rating (6b).

The principle of providing a hotel type use in a similar type of location has been accepted by the planning permission at Nos. 155 & 157 Regent's Park Road, London NW1 8BB. Planning permission was granted 7 December 2022 (planning ref: 2021/0877/P), for: *“Demolition of existing building and redevelopment to provide a part 4 storey/part 7 storey building, with two basement levels, for a 59 bedroom hotel, with new street level public realm works in front (at junction of Regent's Park Road, Adelaide Road and Haverstock Hill).”*

Paragraph 6.2.22 of the planning committee report stated: “The provision of hotels to support a local need is supported by policy E3 and the site, whilst outside a Town Centre does sit at a busy crossroads at the entrance to Camden Town Centre and is well located for access to public transport. The site is currently occupied by commercial uses and the proposed hotel use by virtue of its size and proximity to the Roundhouse is considered to be acceptable in this location.”

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

The property lies within the Bloomsbury Conservation Area.

The proposal would have a positive impact on the character and appearance of the locality because of the introduction of a green wall (soft landscaping).

The Council's planning report for the previous refusal stated: “6.5 The host building, which is noted as making a positive contribution to the Bloomsbury Conservation Area, is wholly unaltered on the front elevation and rear elevation. The inclusion of a green living wall and installation of a 1.7m high obscure glazing to protect the privacy of future residents and ground floor levels are not expected to negatively impact the character or setting of the existing building or the wider conservation area. These alterations are modest and would be in keeping with the overall design, ensuring the proposal preserves the conservation area's integrity.”

8.0 Impact on neighbouring amenity

The proposal has no impact on neighbouring amenity.

9.0 Standard of accommodation

Short-term letting accommodation are not required to meet the standards applicable to new residential.

The proposed drawings demonstrate the proposed accommodation provides a very large glazing to floor space ratio. The large levels of glazing would be set back 3.5 metres from the boundary wall and would allow high level uninterrupted outlook. The outlook towards the boundary wall will be a pleasant view because the wall will be a green living wall – the provision of a green living wall can be required by the imposition of a planning condition.

It is not possible to provide cross ventilation in the proposed dwelling, but the large sliding glazed doors would allow a massive amount of ventilation. Additionally, if it is considered necessary then the applicant would accept a planning condition requiring mechanical ventilation.

10.0 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 is proposed to be “car free.

The proposal will provide a cycle parking space within the hallway of the proposed flat – this was considered acceptable in the previous application.

11.0 Refuse and recycling provision

The refuse will be collected privately.