

## Planning Ref 2012/2401 18 Stukeley Street Planning Statement

### Background.

Foundation Architecture Ltd (FAL) have submitted a planning application for the change of use of the upper parts of No 18 Stukeley Street to form 3 Flats. The ground and basement floors are to remain in B1 use or to become D1 use.

FAL made a pre application submission to the the Local Authority (LA) The London Borough of Camden (LBC) to deal with the principle issue of the change of use to residential. As part of that submission marketing and planning statements were submitted.

LBC have not registered the planning application and require a further planning statement to be submitted and this statement draws on the information already submitted to the Council.

### History

The building was constructed as a B8/B1 office /light industrial building and the history is set out in the accompanying marketing information.

The building had remained vacant from 2010 as the B1 market for poor quality office space had declined.

There was however great interest in D1 uses with Central Governments support of the education sector. Interest from a D1 user was expressed in No 18 Stukeley Street and rather than have the building vacant the owner took the pragmatic decision to bring it back into use with a D1 occupier.

The LA, however, did not accept that the building (at that time) should be used for D1 uses and subsequently refused application 2010/4284/P

The reference to (at that time) in the paragraph above is pertinent to the current application where as a result of the pre application submission the LA now say:

*Alternatively, the basement and ground floors could be used for educational purposes within use class D1.*

## Uses

A marketing exercise was carried out and submitted to LBC as part of the pre application process. The document is re submitted with this report. On considering the report LBC say:

*The marketing evidence submitted with the pre-application suggests that the employment use has been advertised online and via a letting board continuously for 2 years by a reputable local agent. Competitive rates and flexible lease terms have been offered which have only resulted in preliminary interest as listed in the schedule of marketing activity. The marketing evidence submitted is in line with paragraph 13.5 of DP13 and 6.18 of CPG5 (Town Centres, Retail and Employment) and suggests that in the current market the premise is not attractive to potential occupiers.*

*Council policies state that, where a site does not have the potential to continue its existing business use, preference will be given to maintaining the site within an alternative business use, with higher priority to retention of flexible space for B8 or B1 light industry. In light of this, consideration should be given to the suitability of the existing site and building to be used for a range of employment uses and in particular the tests listed paragraphs 13.3 and 13.4 of DP13 should be taken into account. The subject site and premise is not considered to be suitable for flexible employment uses given the access roads (Smart's Place and Macklin Street) are narrow which restricts large vehicles in and around the site and also the premise does not include any loading facilities and has low floor to ceiling heights (varying from 2.4m to 3m).*

With regard to the ground floor LCB give the following advice in their pre application response which has been followed:

*The pre-application proposes to change the use of the whole premise to C3 residential use to accommodate either four or five units. However, it is difficult to achieve a reasonable standard of residential accommodation at the basement and ground floor levels for future occupants. The basement level would have restricted daylight access given the only source of light is from highlevel windows and these windows would not be openable which would further restrict ventilation. Therefore residential accommodation at this level is considered to be unsustainable and would be contrary to CPG 2 (Housing) and CPG 3 (Sustainability). The ground floor residential accommodation would provide poor outlook for future occupants given the windows would look directly onto Stukeley Street and Smart's Place. Furthermore, these windows along would provide no privacy for the occupants at ground floor level.*

*Therefore it is suggested that a more suitable use is provided at the basement and ground floor levels given it is difficult to achieve a reasonable standard of residential accommodation at these levels. Policy DP13 states community use as an alternative to residential use where there is to be a change of use from B1 offices. Alternatively, as the subject site is located in the Central London Area and has good public transport connections, with Holborn tube station and various bus routes along High Holborn in close proximity, it is recommended that the B1 office use is retained. Although the marketing evidence suggests that the premises is not currently attractive to B1 occupiers it may be possible for the basement and ground floor levels to be refurbished or remodelled part of a mixed use scheme with residential on the upper floors, ensuring it is more attractive for prospective tenants. Alternatively, the basement and ground floors could be used for educational purposes within use class D1. The property to south-west of the subject site, no. 16 Stukeley Street, is a good*

example where the basement and ground floor levels have been retained as D1 use with C3 residential to the upper floors (refer to application no. 2006/3798/P).

Given that the current market for both BI and DI users is very volatile it is proposed that both uses are sought for the ground floor. The basement space will remain as storage due to the limited light available.

## Lifetime Homes

The LA have asked us to specifically comment on the following Lifetime Homes criteria and it is noted that the small footprint and layout of the existing building has a significant impact on the ability of the floors to achieve full DDA access.

### **1 Parking - no parking is provided**

*General Note: Criterion 1 is not relevant to developments that do not contain any parking provision. However, consultation with the local planning department regarding parking arrangements for Lifetime Homes and wheelchair accessible properties on such developments will be required*

### **3 Approach to all entrances**

- The ground floor if the building is raised from pavement level.
- There is not sufficient pavement to create a ramped access.
- FAL have made an application for the reconfiguration of the frontage of the building which was refused under 2010/6611/P therefore the existing access arrangements with the raised ground floor will remain.

### **5 Communal stairs and lifts**

A staircase and lift are provided to all residential units. Given that the building is not wheelchair accessible and the limited width of the building the lift will suit ambulant disabled access.

### **6 Internal doors and hallways**

Are compliant with the building regulations and meet the requirements for ambulant disabled access.

### **7 Circulation Space**

Is compliant with the building regulations and meet the requirements for ambulant disabled access.

### **10 Entrance level wc and shower drainage**

Provided to all units

### **12 Stairs/lifts and stairlift to duplexed unit only required.**

Lift access is provided to all floors

### **14 Bathrooms**

Bathrooms will be accessible to ambulant disabled occupiers.

## **15 Glazing and window handle heights**

Glazing design is restricted by the requirements of the Conservation Officer and proposals to re fenestrate the main windows are not included however where possible window opening gear will be located below 1200mm alf.