



9-13 GRAPE STREET

PLANNING STATEMENT

August 2014

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Tel: 020 7004 1700
Fax: 020 7004 1790

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1.0 INTRODUCTION

- 1.1 This planning statement has been prepared by DP9 Ltd on behalf of Project Met ('the Applicant') in support of an application for full planning permission for a residential development at 9-13 Grape Street. The site is located within the Bloomsbury Ward within the London Borough of Camden (LBC).
- 1.2 The full planning permission seeks permission for the "*Extension, alterations and change of use of existing building (sui generis) into residential (C3)*"
- 1.3 This document will provide an overview of the site and the proposed development and considers the relevant planning policies and sets out a justification for the development.
- 1.4 The planning statement should be read in conjunction with the other supporting information submitted in support of the application which comprises;
- Planning application forms and Certificates prepared by DP9;
 - CIL information form prepared by DP9
 - Design and Access Statement prepared by Robin Partington & Partners;
 - Heritage/Townscape Statement prepared by Richard Coleman City Designer;
 - Sustainability Statement prepared by Scotch Partners;
 - Energy Strategy prepared by Scotch Partners;
 - BREEAM Assessment prepared by Scotch Partners;
 - Sunlight and Daylight Assessment prepared by GIA;
 - Internal Daylight Assessment prepared by GIA;
 - Statement of Community Involvement prepared by Quatro;
 - Land Use/Marketing Report prepared by REM Roberts;
 - Background Noise Assessment prepared by Scotch Partners;
 - Draft Construction Management Plan prepared by Charter Construction Plc;
 - Affordable Housing Statement prepared by DS2
- 1.5 The following section of the report is structured as follows:-
- Section 2: Site and Surrounding Area – describes the location, character and physical features of the site.

- Section 3: Planning History – sets out the relevant planning history of the site.
- Section 4: Proposed Development – describes the application proposal.
- Section 5: Consultation – describes the consultation that has been undertaken on the proposed development prior to the submission of the planning application.
- Section 6: Planning Policy Framework – describes the planning policy framework applicable for this development.
- Section 7: Assessment – assesses the proposals against the provisions of the Development Plan and other planning policy and material considerations
- Section 8: Conclusion – draws together the Statement into a set of conclusions.

2.0 THE SITE AND THE SURROUNDING AREA

The site

- 2.1 The site is situated in the Bloomsbury Ward of the London Borough of Camden (LBC). The site is situated on Grape Street and comprises a period building set out over lower ground, ground and three upper floors.
- 2.2 The site is in sui generis use comprising a mixture of office and photographic studios gymnasium and gallery space.
- 2.3 The building itself is not listed, but is identified as making a positive contribution to the Bloomsbury Conservation Area in the LBC Bloomsbury Conservation Area Appraisal and Management Strategy (2011).
- 2.4 Grape Street is a narrow period street, with tall buildings on both sides. As they are all effectively single-sided, the facades facing Grape Street are heavily fenestrated with detailed window treatments in terracotta and red brick. The site is located mid-way along Grape Street on the eastern side of the street and is orientated north south. The principal elevation fronts Grape Street, with a secondary rear elevation set back off West Central Street.
- 2.5 The site is located in an accessible location with a Public Transport Accessibility Level (PTAL) rating of 6b, which is rated as 'Excellent', as calculated using the Transport for London (TfL) PTAL calculation methodology.

The Surrounding Area

- 2.6 The surrounding area comprises a mixture of land uses including commercial, residential and cultural uses. The adjacent nos. 1-7 and opposite nos.2-20 Grape Street are grade II listed.
- 2.7 A number of London underground stations are located in close proximity to the site. London Underground services can be accessed from Holborn station to the east and Covent Garden underground station to the south. Whilst Tottenham Court Road provides further London Underground services to the west

3.0 PLANNING HISTORY

- 3.1 An application was refused in May 2014 (2013/7894/P) for the Erection of roof extension and change of use from office and photographic studios (Class B1), gymnasium (Class D2) and gallery (Class D1) to 7 (6 x 2 bed and 1x3 bed) residential units (Class C3), replacement of rooftop plant and associated works.
- 3.2 An application was submitted and withdrawn by the previous owner in October 2012 (2012/5156/P) for the erection of a mansard roof extension to create a new fourth floor comprising 3 x bedroom self-contained unit (C3) and associated re-installation of 5 x air conditioning units, reinstatement of 2 x chimney stacks and installation of 4 x solar heaters, 10 x photovoltaic panels, 2 x rooflights, a lift overrun and roof access hatch to new flat roof.
- 3.3 Planning permission was granted in 2009 (ref:2009/0636) for the retention of use from office to a mixture of uses comprising office and photographic studios, gymnasium and gallery and the proposed installation of a roller shutter on the entrance of the Grape Street elevation. The officer's report for the application states that the proposals would change the use of the site from office to sui generis use comprising a mixture of office space, gymnasium, photographic studios and gallery.
- 3.4 Planning permission was refused in August 2001 (PX0104247) for alterations and erection of a two storey roof extension to be used for office and residential purposes. The reasons for refusal listed on the planning decision notice include 'The proposed massing, scale, bulk and detailed design would have an unacceptable impact on the conservation area and adjacent listed buildings.' Further reasons for refusal include increased sense of overbearing/enclosure and loss of light, outlook and privacy for the adjacent 6-18 Grape Street and failure to provide separate access for the proposed residential and office uses. The application was subsequently dismissed at appeal in March 2002. The Inspector did not consider the requirement for separate access for the residential and office uses to constitute a reason for refusal but otherwise agreed with the Council's reasons for refusal.
- 3.5 Planning permission was granted in 1987 for works of refurbishment including the installation of new shopfronts and rear extension to wall at third floor level and bricking up windows at the rear.

4.0 PROPOSED DEVELOPMENT

4.1 The application seeks full planning permission for:

‘Extension, alterations and change of use of existing building (sui generis) into residential (C3)’

4.2 The proposals seek to bring the site back into use through the provision of sustainable high quality residential development. The proposed scheme will accommodate 2 x 3 beds and 6 x 2 beds.

4.3 A breakdown of the existing and proposed floorspace is shown in the table below.

	Existing Floorspace (SQ.M)	Proposed Floorspace (SQ.M)	Uplift (SQ.M)
GIA	1,010	1,084	74
GEA	1,240	1,409	169

4.4 Located within the Bloomsbury Conservation Area, the proposals have been designed to be in keeping with the character and appearance of the Conservation area. The aim of the current proposal pays particular attention to LBC’s considerations by proposing to inhabit the current roof, with some alterations to the profile on the eastern side. The roof profile facing Grape Street diminishes in height from north to south across the site and has the lowest points of the section along the Grape Street frontage.

4.5 The existing façade is to be retained and repaired where necessary. Further information on the design approach and proposed roof extension are discussed in detail in the Design and Access Statement submitted with this application.

4.6 Throughout the development of the scheme, careful consideration has been given to the design of the building, particularly in respect to the surrounding properties. The Applicant is proposing fritting to the glass, which will be permanent and unable to be removed by occupiers.

Car and Cycle parking

4.7 There are no car parking spaces proposed as part of the development.

- 4.8 The two ground floor duplex units will accommodate their bicycle space within the ground floor level layout. A total of 8 bicycle spaces (1+ per each residential unit) will be provided for the ground floor for the remaining units.

Servicing and Waste Collection

- 4.9 The residential waste and recycling store of 9m² has been provided on the basement level with access from the street provided by means of a lift. On the ground floor, a temporary storage area, shared with the bicycle store, allows the bins to be brought out to the street for collection via a dedicated doorway. The visual impact is minimised as the Bin Store is contained in a separate designated space. The proposed refuse and servicing strategy is outlined further within the Design and Access Statement.

5.0 CONSULTATION

- 5.1 On 14th July letters were hand delivered to all 22 residents of King Edward and Queen Alexandra Mansions and 6 Grape Street businesses asking for comments on the revised proposals following the refusal in May 2014. Following this letter two local residents responded and a meeting was subsequently arranged on 30th July with residents. The consultation with residents is ongoing.
- 5.2 A Statement of Community Involvement (SCI) has been submitted with the application which outlines all consultation activities that have taken place with stakeholders and the local community. It also outlines the issues raised during the consultation exercise and how the applicant has responded to them.

6.0 PLANNING POLICY FRAMEWORK

6.1 This section of the statement reviews relevant planning policy in relation to the proposed development.

National Planning Policy Framework (NPPF)

6.2 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and supersedes previous national planning guidance setting out the Government's economic, environmental and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system. The NPPF sets out key policies on delivering sustainable development, which include:

- Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.
- Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.
- Housing applications should be considered in the context of the presumption in favour of sustainable development. Local Planning Authorities (LPA) should normally approve applications for change to residential use and any associated development from commercial buildings, provided that there are not strong economic reasons why such development would be inappropriate.
- Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is however, proper to seek to promote or reinforce local distinctiveness. Planning policies and decisions should

address the connections between people and places and the integration of new development into the natural, built and historic environment.

Development Plan

- 6.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts, should be made in accordance with the Development Plan unless material considerations indicate otherwise. In this instance the Development Plan for the area consists of the London Plan adopted in July 2011, and the London Borough of Camden Core Strategy and Development Plan Policies Documents (2010).
- 6.4 On 11 October 2013, the Mayor published Revised Early Minor Alterations to the London Plan (REMA). From this date, the REMA are operative as formal alterations to the London Plan (the Mayor's spatial development strategy) and form part of the development plan for Greater London.
- 6.5 On 15th January 2014, the mayor published his Draft Further alterations to the London Plan (FALP), for consultation. The Draft FALP proposes a significant increase to the annual housing supply numbers from 32,200 per annum to 42,200 per annum. This echoes the recent proposals in the Draft Housing Strategy which was published for consultation at the end of last year. The Draft FALP will be open to a 12 week public consultation followed by a public examination in 2014. The aim is for adoption of the Further Alterations by March 2015.

The London Plan (2011)

- 6.5 The London Plan was formally adopted in July 2011 and is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. Within the London Plan, the site lies within the Inner London area.
- 6.6 The London Plan contains a number of key policies relevant to the development proposals including: -

- London Plan Policy 3.3 seeks to increase housing supply and the Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford.
- London Plan Policy 3.4 requires housing development to take into account local context and character amongst other design principles and optimise housing output through new development.
- Policy 3.5 examines the quality and design of housing developments and states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. The design of all new housing development should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open space;
- London Plan Policy 3.8 concerns housing choice in London and that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments;
- London Plan Policies 3.10 – 3.13 address the subject of affordable housing and the negotiation of such housing on private residential and mixed use schemes. The maximum reasonable amount of affordable housing should be sought when negotiating on such schemes and these negotiations should take account of their individual circumstances including development viability, the availability of public subsidy and other scheme requirements;
- London Plan Policy 6.1 seeks to reduce the need to travel while Policy sets out the requirements in relation to cycle parking;
- London Plan Policy 7.2 relates to an inclusive environment that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design; and
- London Plan Policy 7.4 relates to local character and states that development should have regard to the form, function, and structure of an area, place or street and the scale,

mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

LB Camden Core Strategy (2010)

- 6.7 The Core Strategy and Development Plan Policies Document were adopted in November 2010. In addition, further guidance is provided in the form of the Council's and Mayor's Supplementary Planning Guidance ('SPG') or Supplementary Planning Documents ('SPD') as well as Camden Planning Guidance notes ('CPG').
- 6.8 The Core Strategy sets out the Council's spatial vision, strategic objectives and spatial strategy on how the borough should develop. Key policies within the document relevant to the development proposals are as follows:
- 6.9 Policy CS1 aims to focus Camden's growth in the most suitable locations while achieving sustainable development, and providing in the region of 12,250 additional homes between 2011/11 and 2024/25;
- 6.10 Policy CS5 aims to manage the impact of growth and development in Camden by ensuring that development meets the full range of objectives of the Core Strategy and other Local Development Framework documents;
- 6.11 Policy CS6 of the Core Strategy relates to housing and has the key aim to provide quality homes within Camden. Housing is regarded as a priority land use within the LDF;
- 6.12 Policy CS8 of the Core Strategy seeks to safeguard existing employment sites and premises in the Borough that meet the needs of modern industry and other employers. Paragraph 8.8 states that the future supply of offices in the Borough can meet projected demand and that consequently the Council will consider proposals for other uses of older office provision if they involve the provision of permanent housing and community uses.

- 6.13 Policy CS10 of the Core Strategy supports the retention and enhancement of existing community, leisure and cultural facilities.
- 6.14 The CS (paragraph 8.20) seeks to protect premises that are suitable for small businesses, particularly those under 100sq.m, and ensure that new proposals do not result in a net loss of premises suitable for small businesses.
- 6.15 Policy CS13 will require all development to take measures to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation;
- 6.16 Under Policy CS14 the Council will ensure that Camden's places and buildings are attractive, safe and easy to use by requiring development of the highest standard, seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible; and
- 6.17 Policy CS17 aims to make Camden a safer place by ensuring to work with their partner to tackle crime and anti-social behaviour and to encourage appropriate security and community safety measures. Camden requires development to demonstrate that they have incorporated the Design principles which contribute to community safety and security, particularly in areas with relatively high levels of crime, in particular Camden Town, King's Cross, Bloomsbury, Covent Garden and Kilburn; and
- 6.18 Under Policy CS18 the Council will seek to make Camden a low waste borough and make sure that developments include facilities for the storage and collection of waste and recycling.

LB Camden Development Policies Document (November 2010)

- 6.19 The DPD supports the Core Strategy and London Plan, setting out the detailed policies for managing development within the borough. Key policies relevant to the development proposals are considered to be:
- Policy DP2 aims to make full use of Camden's capacity for housing and seeks to maximise the supply of additional homes in the borough, especially homes for people

unable to access market housing. The Council will expect the maximum appropriate contribution to the supply of housing and resist alternative development of sites considered particularly suitable for housing;

- Policy DP3 demonstrates that the Council will expect all residential developments with a capacity for 10 or more additional dwellings and/or a floorspace of 1,000 sq m (gross) which is capable of accommodating 10 family dwellings will expect all residential developments that would provide additional built residential floorspace of 1,000 sq m (gross) to make a contribution to the supply of to make a contribution to the supply of affordable housing. The Council will expect the affordable housing contribution to be made on site, but where it cannot practically be achieved on site, the Council may accept off-site affordable housing, or exceptionally a payment-in-lieu.
- Policy DP6 states that all housing development should meet lifetime homes standards and that 10% of homes developed should meet either wheelchair housing standards, or be easily adapted to meet them;
- Policy DP13 of the Development Policies seeks to retain land and buildings that are suitable for continued business use and resists a change to non-business use unless: a) it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use; and b) there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time;
- Policy DP13 states that when it can be demonstrated that a site is not suitable for any business use other than B1(a) offices, the Council may allow a change to permanent residential use or community use;
- Paragraph 13.3 of the Development Policies states the Council will take into account the below criteria when considering proposals that involve the loss of a business use. Whether the site:
 - Is located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing;

- Is in a location suitable for a mix of uses including light industry and local distribution warehousing;
 - Is easily accessible to the Transport for London Road Network and/or London Distributor Roads;
 - Is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water;
 - Has adequate on-site vehicle space for servicing;
 - Is well related to nearby land uses;
 - Is in a reasonable condition to allow the use to continue;
 - Is near to other industry and warehousing, noise/vibration generating uses, pollution and hazards;
 - Provides a range of unit sizes, particularly those suitable for small businesses (under 100sq.m).
- Paragraph 13.5 of the Development Policies states that 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.

6.20 Policy DP15 of the Development Policies resists the loss of existing community facilities unless:

- A replacement facility that meets the needs of the local population is provided or;
 - The specific community facility is no longer required in its current use, where this is the case, evidence is required to show that the loss would not create, or add to, a shortfall in provision for the specific community use and demonstrate that there is no demand for any other suitable community use on the site. Where this is successfully demonstrated, the Council's preferred new use will be affordable housing.
- Paragraph 15.6 of the Development Policies states that where the loss of a community facility is proposed the Council will expect the submission of marketing evidence to

show that premises have been offered at a reasonable charge to community groups or voluntary organisations over a 12 month period. Existing community facilities should be offered to potential new users on the same financial basis as that of the previous occupant. If there were no recent users, the space should be offered at an appropriate rate for community groups/voluntary sector organisations.

- Policy DP16 seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. The Council will resist development that fails to assess and address any need for movements to, from and within the site and additional transport capacity off-site where existing or committed capacity cannot meet the additional need generated by the development;
- The Council will promote walking, cycling and public transport use under Policy DP17 and development should make suitable provision for pedestrians, cyclists and public transport use. The Council will resist development that would be dependent on travel by private motor vehicles;
- Policy DP22 requires developments to incorporate sustainable design and construction measures by incorporating green or brown roofs and green walls wherever suitable and by expecting new build development to achieve Code for Sustainable Homes Level 4 by 2013;
- Under Policy DP23 the Council will require developments to reduce their water consumption, the pressure on the combined sewer network and the risk of flooding;
- Policy DP24 requires all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider a variety of factors such as the quality of materials to be used, the appropriate location for building services equipment and the provision of appropriate amenity space;
- Policy DP25 seeks to conserve the heritage of Camden. Development affecting conservation areas should take account of conservation area statements and will only be permitted if it preserves and enhances the character of the conservation area. It seeks

to preserve trees and garden spaces which contribute to the character of the conservation area; and

- Policy DP26 aims to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity such as visual privacy, overshadowing, noise & vibration and microclimate. The Council will also require developments to provide an acceptable standard of accommodation (dwelling and rooms' sizes etc), facilities for the storage of waste, bicycle storage and outdoor space for private or communal amenity space wherever practical.

Camden Planning Guidance 1: Design (2013)

6.21 This Planning Guidance has been prepared to support the policies in our Local Development Framework (LDF). It is consistent with the Core Strategy and the Development Policies, and forms a Supplementary Planning Document (SPD) which is an additional “material consideration” in planning decisions.

6.22 This guidance provides contained within this section therefore considers a range of design related issues for both residential and commercial property and the spaces around them.

Camden Planning Guidance 2: Housing (2013)

6.23 This guidance note provides information on all types of housing development within the borough including affordable housing, student housing, residential space standards and lifetime homes and wheelchair housing. It provides further detail on how the Council will deal with the delivery of affordable housing and the use of affordable housing credits.

Camden Planning Guidance 3: Sustainability (2013)

6.24 This guidance provides information on ways to achieve carbon reductions and more sustainable developments. It also highlights the Council's requirements and guidelines which support the relevant Local Development Framework (LDF) policies

Camden Planning Guidance: 5: Town Centres, Retail and Employment (2011)

6.25 This guidance provides information on way;

- Retail uses;
- Town centres;
- Central London local Areas;
- Central London frontages;
- Neighbourhood centres;
- Small shops;
- Controlling the impact of food, drink and entertainment uses; and
- Employment sites and business premises.

6.26 The guidance outlines the following criteria which the Council will take into account when considering proposals for the loss of office use:

- The age of the premises. Some older premises may be more suitable for conversion.
- Whether the premises include features required by tenants seeking modern office accommodation.
- The quality of the premises and whether it is purpose built accommodation. Poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion.
- Whether there are existing tenants in the building, and whether these tenants intend to relocate.
- The location of the premises and evidence of demand for office space in this location; and
- Whether the premises currently provide accommodation for small and medium businesses.

Camden Planning Guidance 6: Amenity (2011)

6.27 This guidance is intended to provide information on all types of amenity issues including, daylight/sunlight, overshadowing, construction management plans and open

space facilities. The guidance provides details on the level of contributions required where public open space is not provided on site.

Camden Planning Guidance 7: Transport (2011)

6.28 Camden faces considerable transport challenges including congestion and poor air quality and this guidance contains information on a variety of transport issues including travel plans, car free development, vehicle access, public spaces and cycling facilities.

Camden Planning Guidance 8: Planning obligations (2011)

6.29 The purpose of this guidance is to provide an indication of what may be required when the Council considers that a development proposal needs a planning obligation to be secured through a legal agreement. These obligations will be used to ensure that the strategic objectives of the LDF Core Strategy and Development Policies are met through requirements attached to individual development proposals.

7.0 ASSESSMENT

7.1 This section assesses the proposals against the Development Plan and other relevant Planning Policy at national or local level.

Site Designations

7.2 The site has the following designations;

- Central London Area;
- Bloomsbury Conservation Area;
- Archaeological Priority Area;
- Museum Street Area;
- Tottenham Court Road Growth Area

Key Changes from December 2013 Application

7.3 In summary the key changes to the previous planning application (2013/7894/P) are as follows;

- 1) Conversion of whole building to residential use and removal of offices on basement and ground floor level.
- 2) Amendment to originally proposed single storey roof extension which diminished in height from north to south across the site and had the lowest points of the section along the Grape Street frontage. The revised proposal inhabits the current roof with some alterations to the profile on the eastern side.
- 3) The introduction of glass fritting across the façade of 9-13 Grape Street. The fritting to the glass will be permanent and unable to be removed by future occupiers

Principle of Development

7.4 The site currently falls under a 'sui generis' use made up of offices, photographic studios, gymnasium and gallery. Any new balance of land uses would require planning permission because the sui generis consent reflected the specific circumstances of the previous occupier. Whilst there are no policies protecting sui generis use we have elected to justify within this statement why the loss of each of the individual components of the sui generis use is acceptable.

- 7.5 CS8, CS10, DP 13, DP15, and CPG 5 outlines that evidence should be provided to substantiate the loss of existing employment and leisure uses on site. A report has been submitted alongside this application by James Askham on behalf of REM Roberts which provides an assessment of the quality of the existing building and unsuitability for B1, D1 and D2 uses.
- 7.6 The application site has been vacant since quarter 1 of 2013. The last remaining occupier used the building in its current configuration and went out of business in 2012. The building was marketed for a period of five months from February 2013 to May 2013 by Savills .Six inspections were undertaken (of varying size ranges) during this time but no serious interest was developed, illustrating the lack of demand for these uses. Further information on the marketing undertaken is detailed within the REM Roberts report.

Loss of BI use

- 7.7 DP13 outlines that the council will retain land and buildings that are suitable for continued business use and will resist the change to non-business use unless it can be demonstrated that the building is no longer suitable for its existing business use and where there is evidence that the possibility of retaining or redeveloping the site or building for similar or alternative use has been fully explored. The site is vacant and has been since the first quarter of 2013. The current occupier went out of business and there has been no significant interest in the site since it became vacant illustrating that the existing use is no longer suitable. The Council had previously threatened the operator with enforcement action because of the noise and disturbance generated by the use. The enforcement action was triggered by complaints from the neighbours.
- 7.8 When looking at the previous consented scheme at this site, the office floorspace was located on the ground floor (approximately 202sqm). In order for the building to function as an office, planning permission would be required for office use on the site and it should be noted that due to this factor the site is not currently part of the available office stock, although as mentioned in 7.6 was marketed by Savills in early 2013. Significant refurbishment would have to be undertaken before any other B1a office use

would be suitable and at the same specification as other offices that attract “normal” market rental levels.

- 7.9 There is an ample supply of office accommodation currently available in the area and in more suitable locations. The change of use of this building to residential use will have no tangible impact on the overall amount of office stock available (or occupied) in the location and will have no detrimental effect to the immediate vicinity at street level. The layout of the building is not suitable for any form of office use as the layout is more akin to a residential dimension, reflecting the primary use (as residential) of the remainder of the street. The building has been altered to suit the ‘sui generis’ use by a single tenant. The sui generis use of the building would make it difficult to market since mixed use buildings of this nature do not appeal to the general market.
- 7.10 An office use (if one could be secured) would generate a high occupancy level for the building, with a lot of day to day vehicle and pedestrian movement, including late night activity, as well as issues associated with office workers smoking on the street, ancillary office events etc. The use would also generate associated light pollution, and there would be desks pressed up against the existing windows. The implications for the residential neighbours would be far more significant than a lower density residential use.
- 7.11 Given the above, it is therefore considered that the proposed development meets the requirements of, and accords with Policy CS8, DP13 AND CPG5.

Loss of D1/D2

- 7.12 The building provided a gallery space and gym as part of the consented scheme in 2009. The previous user tried to provide a gym with a mixture of dance classes with a spa. This concept did not work as the building has been vacant for some time and the last user went out of business. There is already ample supply of gymnasia within the vicinity of Grape Street and there is unlikely to be any additional demand for this use at Grape Street.
- 7.13 It is unlikely that there is high demand for a gallery space within the area. It would seem that the gallery was used for dance classes and for photo-shoots that was associated with the other sui-generis uses on site.

- 7.14 As the Officer's report for the application consented in 2009 outlined the lawful use is sui generis; therefore the existing use of the site is not specifically protected by adopted policy and therefore the proposed change of use to residential is considered acceptable in principle.
- 7.15 The NPPF seeks to significantly boost the supply of housing. Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 7.16 Housing is regarded as the priority land-use within the LDF and a residential development which seeks to maximise the supply of additional homes in the borough and the principle of this use should therefore be supported.
- 7.17 Therefore, given the above, it is considered that the proposed development meets the requirements of, and accords with the London Plan and CS10 and DP15.

Residential Quality

Residential Amenity Space

- 7.18 Policy CS5 of the Core Strategy requires development to protect and enhance the amenity and quality of life of local communities.
- 7.19 Policy DP26 contained within the Development Policies document requires outdoor space for private or communal amenity space wherever practical.
- 7.20 The proposals seek to refurbish and inhabit the current roof of the existing building and provide 8 residential units. There is no current amenity space provision on this site and due to the constraints of the existing building the proposed scheme is unable to provide outdoor or communal amenity space. Similar to the previous application in 2013 (2013/7894/P) we would expect that a S106 contribution towards open space would be considered acceptable by Officers.

Accessibility

- 7.21 London Plan Policy 3.8 requires all new housing to be built to 'Lifetime Homes' standards. The 'Camden Planning Guidance Housing' SPD reiterates this requirement and provides advice on how proposals can be designed in an inclusive manner and be

accessible to all by incorporating ‘lifetime’ home standards. All residential dwellings have been designed to meet the Lifetime Homes standards.

- 7.22 The proposed development has been designed to incorporate a number of access principles, including maximising access to all parts of the residential parts, for all future residents and building users; meeting local, regional and national access and inclusive design policies and designing inclusively by designing beyond the minimum requirement of the Building Regulations Part M to ensure that all people, regardless of disability, age, sex or ability can use and enjoy the built environment. Please refer to the design and access statement for full details.

Affordable Housing

- 7.23 Policy DP3 of the Council’s Development Policies document sets the threshold of 10 units (1000sq.m gross residential floorspace) at which the requirement for affordable housing provision is triggered. The Development Policies document states that the Council’s target of 50% of total additional housing floorspace as affordable housing operates on a sliding scale, subject to the financial viability of the development, with a norm of 10% for 1,000sq.m of additional housing and 50% for 5,000sq.m of additional housing, on sites with a capacity of 10 dwellings and 50 dwellings respectively.
- 7.24 In this case, it is not viable to provide affordable housing on site, regardless of tenure as part of the proposed development scheme. This has been demonstrated through the Viability Assessment prepared by DS2. Therefore, in accordance with the London Plan, a financial contribution is considered appropriate. The provision of a financial contribution which can be pooled to contribute towards an affordable housing development elsewhere in the Borough will ensure that more units are provided off site than could be feasibly achieved on the development site.

Housing Mix

- 7.25 The unit mix to be included within the scheme is demonstrated in Table 1 below.

Table 1: Unit Mix

Unit Size	Private
2 bed	6

3 bed	2
Total	8

7.26 Policy DP5 seeks to provide a range of unit sizes to meet demand across the Borough. The Dwelling Size Priority Table included within Policy DP5 demonstrates that there is a ‘very high’ priority for private two bed units and that developments should aim for 40% of two beds. The scheme also provides one family sized three bed dwelling which are considered a ‘medium priority’ in Camden. The mix provided is considered appropriate as it contributes to the creation of mixed and inclusive communities by containing a mixture of large and small homes in line with Policy DP5. The mix has been designed to suit the existing footprint and character of the building.

Design

7.27 In order to fully appreciate the proposal of this planning application it is important to clarify how the issues raised in the appeal decision (APP/X5210/A/01/1077250) and the refusal in May 2014 have been overcome. The scheme has been designed on the basis of these comments and been a significant factor in the development of the current proposal.

7.28 The current proposal pays particular attention to LBC’s considerations by proposing to inhabit the current roof, with some alterations to the profile on the eastern side. The roof profile facing Grape Street diminishes in height from north to south across the site and has the lowest points of the section along the Grape Street frontage. The proposed massing utilises the existing roof plane and inset skylights to keep the roof profile back from the line of the existing façade - creating a varying sectional condition that will be an appropriate addition to the character of the conservation area while having significantly less impact altogether.

7.29 The previous concerns from the 2013 application (2013/7894/P) relating to privacy/overlooking within this central London location have been addressed within this application. Firstly, the inhabited 4th floor roof retains the pitch of the current roof and the inset windows are set back from the parapet increasing the distance from the properties on the side of Grape Street. In addition, the Applicant is proposing to introduce glass fritting across the façade of 9-13 Grape Street. The fritting to the glass

will be permanent and unable to be removed by future occupiers. This will alleviate any potential privacy or overlooking issues for future occupiers.

Townscape, Heritage and Visual Impact

- 7.30 A separate Townscape and Visual Impact (TVI) report has been prepared by Richard Coleman of City Designer. The report provides comprehensive heritage analysis by way of historic research and assessments of the local designated area and the building itself. Throughout the evolution of the scheme the architects and the townscape consultants have collaborated on the design approach.
- 7.31 The report assesses the character and appearance of Sub Area No 8 of the Bloomsbury Conservation Area, in which the site exists, both in relation to the wider Georgian areas and in relation to its own Edwardian content. No 9-13 Grape Street makes no contribution to the wider Georgian character and appearance, but makes an important contribution to the character and appearance of Sub Area No 8.
- 7.32 The report outlines that views from the extreme ends of Grape Street are most significant and exclude visibility of the proposed roof. This is also the case with less significant views such as the broader view from the southern pavement of Holborn.
- 7.33 The report concludes that the subtle changes and additions being proposed in this planning application do constitute enhancements, adding richness to one of the buildings in the enclave which lacks it, compared to its neighbours. In so doing, it enhances the character and appearance of Sub Area 8 and the setting of the neighbouring grade II listed Queen Alexandra Mansions.
- 7.34 As a consequence of the above, the proposed development is considered to accord with the NPPF and Policies CS14, DP24, DP25 and 7.1 of the development plan.

Sunlight/Daylight

- 7.35 In accordance with Policy DP26, a Daylight and Sunlight report has been undertaken by GIA in support of this application to consider the sunlight and daylight impact on neighbouring buildings.

- 7.36 The daylight and sunlight report provides an assessment of the effect that this updated scheme will have on the daylight and sunlight of surrounding properties. This current daylight, sunlight and overshadowing report has carefully considered the relevant residential surrounding properties and technical assessments have been undertaken for all the relevant habitable rooms. All of the windows within both surrounding properties meet the BRE Guidelines in respect of the VSC and NSL. There will be no noticeable change in the daylight to the existing residential properties and compliance with the BRE guidelines is demonstrated.
- 7.37 GIA have also tested the ADF position. The results show that for all of the surrounding properties, the change in ADF value is negligible with changes of 0.01% to 0.04%. All of the properties surrounding the site will retain sunlight levels that comply with the BRE guidelines.
- 7.38 All the properties surrounding the site will retain sunlight levels that comply with the BRE guidelines. GIA have outlined within their report that the proposed development will have no material impact to the daylight and sunlight levels to the surrounding residential accommodation.
- 7.39 It should be taken into consideration that the previous larger scheme was considered acceptable by Officers compliant with guidance forming part of CPG6 (Amenity) and DP26 (Managing the impact of development on occupiers and neighbours), and overcoming the concerns raised within the 2002 appeal decision.
- 7.40 For further detail in this regard please refer to the accompanying Daylight and Sunlight Report and Internal Daylight Assessment provided by GIA.

Transport, Parking and Servicing

- 7.41 The proposed development will not provide any car parking on site. Residents would not be permitted to apply for on-street car parking permits for themselves or visitors. The proposed development therefore accords Policy DP18 which expects development to be car free in development.

- 7.42 The development proposes 8 cycle parking spaces for the 8 residential units. Camden's development policy DP18 outlines that 1 storage or parking space should be provided per unit. The proposed development therefore accords with the number of cycle spaces required under Policy DP18
- 7.43 A residential waste and recycling store has been provided at the basement level with access from the street by means of a lift. On the ground floor a service passageway allows the bins to be brought out to the street for collection via a dedicated doorway. The bin store is proposed in a separate designated space to reduce the visual impact.
- 7.44 On collection days the refuse will be taken up to the ground floor level by lift and positioned on the pavement, then returned to the refuse store following collection.
- 7.45 The storage of waste and recycling complies with Camden CPG 1 guidance. The proposed refuse and servicing strategy is outlined further within the Design and Access Statement.

Sustainability and Energy

- 7.46 The NPPF states that local planning authorities should approve planning applications if their impacts are (or can be made) acceptable in sustainability terms. Policy 5.2 of the London Plan states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy; 1) Be lean: use less energy 2) Be clean: supply energy efficiently 3) Be green: use renewable energy.
- 7.47 A sustainability strategy has been prepared by Scotch Partners. The strategy has been informed by a preliminary BREEAM Domestic Refurbishment assessment for which a target rating of 'Excellent' is being sought.
- 7.48 A number of sustainability standards and targets have been identified for the proposed scheme in line with Camden's policy requirements;
- Reduce CO2 emissions over existing building performance;
 - Target water use rate of between 107 and 117 litres/person/day
 - No net gain in peak run-off from that of the existing development

- Responsible use of materials:
- Responsible construction practices
- Design for resilience to future climate impacts

7.49 An Energy Statement has been prepared and carried out in line with Camden’s guidance CPG3 – Sustainability. The report considers a wide range of CO2 reduction measures and outlines the proposed energy strategy to comply with Building Regulations Part L 2010, the appropriate planning requirements and the requirements of BREEAM excellent

7.50 Please refer to the Sustainability, BREEAM and Energy assessments prepared in support of this application for further details.

Noise

7.51 A noise assessment has been carried out by an acoustic specialist who advises on the recommended minimum sound insulation performance of the facades.

7.52 All roof-based plant will be located to the rear of the property and out of sight lines from the pavement and adjacent properties. The plant will be screened by the surrounding mansard roof. However, if additional attenuation is required, this could be provided by an acoustically-treated plant enclosure specified in accordance with the recommendations of the acoustic report.

7.53 The noise assessment prepared by Scotch Partners provides further information on the maximum noise emission limits of the external plant, party wall sound insulation and sound insulation performance of facades.

Section 106 Planning Obligations/Heads of Terms

7.54 CPG8 adopted in provides guidance of what may be required when the Council considers that a development proposal needs a planning obligation to be secured through a legal agreement. Planning obligations can be used positively and to address some of the negative impacts of development which would otherwise make a development unacceptable.

7.55 The draft S106 Heads of Terms will include;

- Demolition and Construction Management Plan
- Energy/Sustainability
- Education Contribution
- Community/Open Space Contribution

8.0 CONCLUSIONS

- 8.1 DP9 have been appointed to submit a full planning Application for the extension, alterations and change of use of the existing building (sui generis) into residential (C3).
- 8.2 The planning statement has assessed the proposed scheme against the provisions of the development plan and other material considerations relevant to the determination of the application. It is considered that the proposal accords with the development plan, is a sustainable scheme and in accordance with the National Planning Policy Framework.
- 8.3 The proposals have been designed and carefully considered against the Inspector's comments from the appeal decision (APP/X5210/A/01/1077250) in 2002 and the previously refused scheme in 2014 (2013/1894/P).
- 8.4 The scheme has been produced to be in keeping with the surrounding area but also to maximise the provision of planning benefits for the locality. Eight new residential dwellings are being proposed as part of the scheme, all of which are in line with Camden's dwelling size priority table. The mix will contribute to the creation of mixed and inclusive communities and ensure accessibility and inclusion so that all potential users, regardless of disability, age or gender can use them safely and easily.
- 8.5 Housing is regarded as the priority land-use within the Local Development Framework and a residential development which seeks to maximise the supply of additional homes in the borough and the principle of this use should therefore be supported.