

Firstplan

BOTTLEDOG,
69 GRAY'S INN ROAD,
LONDON WC1X 8TR

PLANNING,
DESIGN AND
ACCESS AND
HERITAGE
STATEMENT



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SECTION 1: INTRODUCTION

- 1.1 This Planning Statement has been prepared by Firstplan in support of a planning application (submitted on behalf of BrewDog Bars Ltd) for the change of use of the basement level of 69 Gray's Inn Road to a Class A4 beer-tasting lounge.
- 1.2 The applicant currently trades their Class A1 BottleDog retail shop from the ground floor of the building and, as it stands, the basement is largely vacant with only limited informal use as ancillary office space and storage. In order to bring this space into a viable and efficient use, they are now intending to utilise the basement as an on-site lounge/tasting area for customers to sample the beers and products available in the store. The use will therefore be directly associated with the existing Class A1 retail unit at ground floor level, and will be open between midday and 9pm in line with the existing store trading hours. Details of the proposed layout and operation are discussed further at Section 3 of this statement.
- 1.3 The proposed use will maximise the efficient use of this building in line with Government and London Plan planning policy objectives, by bringing this currently underutilised basement space into a productive, economic use that will enhance the BottleDog offer and contribute to the overall vibrancy of this part of the Central Activities Zone.
- 1.4 This statement assesses the acceptability of the application proposals in planning terms, and is set out as follows:
 - **Section 2** - describes the site and surrounding area;
 - **Section 3** - details the proposed use;
 - **Section 4** - sets out the key relevant planning policies;
 - **Section 5** - discusses the relevant planning issues;
 - **Section 6** - draws conclusions.



SECTION 2: BACKGROUND INFORMATION

a) Site Description

- 2.1 The application site (No. 69) is located on the western side of Gray's Inn Road, a busy Central London main road running in a north-south direction from King's Cross Station to Chancery Lane. It lies around $\frac{3}{4}$ mile south of King's Cross Station, between Russell Square and Bloomsbury to the west and Farringdon to the east. It is situated within a long Victorian terrace between Roger Street (to the north) and Northington Street (to the south). In line with the character of much of the surrounding area and the wider "Central Activities Zone", the terrace is primarily comprised of retail / commercial uses at ground floor levels, with a mix of residential and offices at upper floors. The adjoining units are occupied by a retail hardware store (No. 67) and a dentist (No. 71).
- 2.2 No. 69 itself comprises residential flats at upper floors, with the ground floor occupied as a Class A1 "BottleDog" retail shop. The basement is linked to the ground floor unit but is currently largely vacant and used only informally as back of house office / storage space associated with the retail store. The basement has a total floor area of approximately 80sqm, with the ground floor retail unit covering 84sqm.
- 2.3 The site is well-served by public transport, with numerous frequent bus services running directly past the site along Gray's Inn Road and nearby Theobald's Road, and both Chancery Lane and Russell Square London Underground Stations less than $\frac{1}{2}$ mile away. It therefore benefits from the highest Transport for London public transport accessibility rating of 6b.

b) Relevant Planning History

- 2.4 The ground and basement levels of the building currently benefit from a flexible planning consent which allows for a range of different uses. This follows a planning consent (ref: 2010/4493/P) granted in October 2010 which allowed for *"change of use from existing shop (Class A1) to flexible uses, either shop (Class A1), financial and professional services (Class A2), or office (Class B1a) at basement and ground floor levels."*



SECTION 3: APPLICATION PROPOSALS

a) BrewDog

- 3.1 BrewDog was originally set-up in 2007 as a specialist brewer of premium craft beers. The company has grown rapidly since its inception, and was named as the UK's fastest growing food and drinks brand by The Times in 2014. BrewDog produce a wide range of varying beer styles and last year brewed and sold approximately 90,000 hectolitres of beer. These beers are stocked and sold from various retail shops, bars and restaurants both across the UK and in 55 countries across the world. These beers are high quality, premium craft beers that are targeted at consumers who appreciate the varied flavour profiles and artisanal methods which go into producing craft beers, rather than mass produced beers and lagers where the focus is more on price than quality.
- 3.2 The company also now operate approximately 20 specialist "BrewDog" bars across the UK, with a total of circa 30 worldwide. These bars have developed a strong reputation as well-run and managed establishments and are operated with a strong emphasis on "beer education", specialising in the sampling and tasting of the extensive range of beers available from both BrewDog and other craft brewers. As a result, the bars have a very strong product focus, and their appeal and target market therefore differs greatly from more traditional and/or mainstream bars. This product-focus is reflected in the premium nature of the beers on offer, with some high end guest beers costing up to £50 per bottle, and an average price in the region of £6 for a single bottle of beer.

b) BottleDog

- 3.3 In 2014, the company opened their first dedicated "BottleDog" retail shop at the application site. With a focus on high quality products and individual customer service, BottleDog is a boutique off-licence where customers can purchase rare and specialist craft beers from around the world with unrivalled levels of customer service from the knowledgeable staff. The store sells over 400 craft beers from around the world, along with soft drinks and related merchandise including books, t-shirts, glassware and "home brew" equipment and ingredients. Photographs of the store are attached at **Appendix 1**.



c) **Proposed change of use**

- 3.4 In addition to and in association with the retail offer, the applicant is now proposing to incorporate an in-store product-tasting lounge area, which will allow customers to sample and consume some of the products on offer on-site. It is intended that this will be located on the currently under-utilised basement floor of the premises, as shown on the proposed layout plan (Drawing No. 100 Rev. C). Planning consent is therefore sought for the change of use of the basement to Class A4 use. This will maximise the efficient use of this site and will help to enhance the overall BottleDog offer, therefore helping to contribute to the diversity, vitality and economy of this part of the Central Activities Zone.
- 3.5 There will be a focus on education for customers utilising the product-tasting area, with table service available and staff on-hand offering the opportunity to discuss and explain the products on offer. All drinks consumed on-site will be subject to an additional “corkage” charge which will bring prices in line with premium on sales pricing as per a BrewDog bar, and will be served in small measures (with a maximum individual size of 2/3 pint for draft products). It is intended that the tasting area will be open in-line with the existing BottleDog retail store trading hours, opening at midday with closing at 9pm.
- 3.6 The proposed basement layout is shown on Drawing No. 100 Rev. C. This shows an indicative seating layout, along with shelving, male and female / disabled WC, and ancillary office/storage space. The basement will be accessed internally via the staircase from the ground floor shop, where the customer counter / tills are located.
- 3.7 A concept document explaining the innovative BottleDog Beer Store format is attached at **Appendix 2**.



SECTION 4: PLANNING POLICY

a) National Planning Policy Framework (NPPF) (2012)

- 4.1 This document sets out the Government's economic, environmental and social planning policies for England. It confirms at paragraph 18 that *"the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future."*
- 4.2 This is reinforced by paragraph 19, which states that *"the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. 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."*
- 4.3 In order to help achieve growth, the document (at paragraph 20) requires local planning authorities to plan proactively to meet the development needs of business and support an economy fit for the 21st century. Paragraph 21 specifically notes that investment in business should not be over-burdened by the combined requirements of planning policy expectations.
- 4.4 The NPPF also provides guidelines in respect of the management and preservation of heritage assets and the historic environment, including Conservation Areas. Of specific relevance, it explains that in managing heritage assets, local planning authorities should take into account both the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, and the desirability of new development making positive contribution to local character and distinctiveness.
- 4.5 At paragraph 187, the NPPF highlights that local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development. It specifically states that:

"Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure



developments that improve the economic, social and environmental conditions of the area.”

b) The London Plan (Further Alterations 2015)

- 4.6 Policy 2.10 relates to the Central Activities Zone, and explains the Mayor will and boroughs should enhance and promote the unique international, national and Londonwide roles of the Central Activities Zone (CAZ), supporting the distinct offer of the Zone based on a rich mix of local as well strategic uses and forming the globally iconic core of one of the world’s most attractive and competitive business locations. This includes supporting and improving the retail offer of the CAZ.

c) Local Planning Policy

- 4.7 Camden’s local planning policies are taken from the adopted Core Strategy, Development Policies and Site Allocations DPDs. The Borough Proposals Map indicates that the site falls within the Central London Area and the “Central Activities Zone”. It is also located within the Bloomsbury Conservation Area and an area of Archaeological Priority. Key policies of relevance to the application proposals are summarised below.
- 4.8 Core Strategy **Policy CS1** explains that the Council will focus Camden’s growth in the most suitable locations, and manage it to make sure that the Council deliver its opportunities and benefits and achieve sustainable development, while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit. It specifically explains that the Council will promote the most efficient use of land and buildings by seeking development that makes full use of its site.
- 4.9 **Policy CS3** explains that the Council will promote appropriate development in highly accessible areas, including across Central London. It notes that these areas are considered to be suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities.
- 4.10 **Policy CS5** relates to growth and development. It explains that the Council will manage the impact of growth and development in Camden. It specifically notes that the Council will protect the amenity of Camden’s residents and those working in and visiting the borough, including by making sure that the impact of developments on their occupiers and neighbours is fully considered.



- 4.11 **Policy CS7** relates to Camden's centres and shops, and explains that Central London will be a preferred location for the provision of retail and other town centre uses.
- 4.12 Development Management DPD **Policy DP10** relates to small and independent shops, and explains that the Council will encourage the provision of small shop premises. It indicates that the Council will seek to protect shops outside centres by only granting planning permission for development that involves a net loss of shop floorspace outside designated centres provided that:
- Alternative provision is available within 5-10 minutes' walking distance;
 - There is clear evidence that the current use is not viable, and;
 - Within the Central London Area, the development positively contributes to local character, function, viability and amenity.
- 4.13 The supporting text to this policy notes that within Camden's Central London area, there is significant competition between competing land uses. As a result, it suggests that additional protection is needed to prevent the widespread loss of A1 retail uses outside centres, in order to ensure that local shops are available for local residents, workers and visitors. Therefore, the Council will only grant permission for the loss of shops outside centres in Central London where it considers that the replacement use will also contribute positively to the local area.
- 4.14 **Policy DP12** relates to food and drink and other town centre uses, and explains that the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. It indicates the following relevant considerations:
- a) the effect of non-retail development on shopping provision and the character of the centre in which it is located;
 - b) the cumulative impact of food, drink and entertainment uses taking into account the number and distribution of existing uses and non-implemented planning permissions, and any record of harm caused by such uses;



- c) the impact of the development on nearby residential uses and amenity, and any prejudice to future residential development;
- d) parking, stopping and servicing and the effect of the development on ease of movement on the footpath;
- e) noise and vibration generated either inside or outside of the site;
- f) fumes likely to be generated and the potential for effective and unobtrusive ventilation;
- g) the potential for crime and anti-social behaviour, including littering.

4.15 The policy also explains that in order to manage potential harm to amenity or the local area, the Council will, in appropriate cases, use planning conditions and obligations to address issues such as hours of operation and the storage and disposal of refuse and customer litter.

4.16 **Policy DP25** relates to heritage matters, and explains that development within conservation areas will only be permitted where it will preserve and enhance the character and appearance of the area.

4.17 **Policy DP26** explains that the Council will only grant planning permission for development that does not cause harm to amenity.

d) **Summary**

4.18 There is a clear national planning policy objective to support the needs of businesses and encourage sustainable economic development wherever possible. Local authorities should proactively work with applicants and look for solutions rather than problems in order to enable them to approve applications wherever possible.

4.19 At both regional and local level, there is a strong policy emphasis on supporting retail, commercial and town centre uses within the Central London area.



SECTION 5: PLANNING AND HERITAGE CONSIDERATIONS

5.1 The key issues for consideration in respect of the proposed change of use are:

- The principle of the change of use;
- The impact of the proposals on the amenity of the area;
- The heritage implications.

5.2 This section of the report discusses these issues.

a) **Principle of the Change of Use**

5.3 Planning policies indicate that the Central London “Central Activities Zone” (CAZ) should be a focus for retail, town centre and commercial uses, with Camden Policy CS3 particularly stating that the area is considered to be suitable for the provision of shops and food, drink and entertainment uses. 69 Gray’s Inn Road is situated within a busy commercial stretch of the CAZ, and is therefore the preferred location in planning terms for uses of the nature proposed by this application.

5.4 This application relates exclusively to the basement level of a long-established commercial unit. The basement (along with the ground floor) benefits from a flexible planning permission allowing for A1, A2 or B1(a) use. The ground floor is currently in Class A1 use, but the basement is largely vacant and underused. Both floors could be altered to Class A2 or B1(a) office use at any time without recourse to the planning system (notwithstanding the additional recent permitted development rights that have been introduced by the Government under the Town and Country Planning (General Permitted Development) (England) Order 2015).

5.5 Given the basement nature of the space and the fact that it lacks any clear frontage or views from the street (and the fact that it is primarily accessible from internally within the ground floor retail unit), it is unlikely that it will ever be sub-divided into a separate Class A1 retail unit. As it stands, it is always most likely to be utilised simply as ancillary, back of house space associated with the ground floor unit. The Council’s policies support Class A1 uses outside of centres; the change of use proposed by this application will ensure not only that the Class A1 use of the ground floor is



retained, but it is consolidated and enhanced by providing an improved offer for it's customers, with the option to taste and sample the products available on-site. It will therefore contribute positively to the character, diversity and offer of the area. Furthermore, it will maximise the efficient use of this site by bringing this currently underutilised space into a more productive, viable use that will appeal to visiting members of the public.

- 5.6 In the light of the above assessment, it is clear that the proposed change of use directly accords with and will help to fulfil many of the key objectives set out within relevant national, London-wide and Camden planning policies. It is therefore considered to be acceptable in principle, subject to ensuring that there is no detrimental impact on the amenity of the surrounding area.

b) Impact on amenity

i) Noise / activity

- 5.7 The application site is located on a busy Central London thoroughfare that generates high levels of activity both throughout the daytime and into the evening. 24-hour public transport runs through the area, and this stretch of Gray's Inn Road incorporates a range of retail and commercial uses, many of which are open into the evening. The area is therefore characterised by consistently high levels of both pedestrian and vehicular movement throughout the daytime, evening and night.

- 5.8 The nature of the proposed use – which involves customers visiting the retail store and sampling products on-site – is highly unlikely to generate significant levels of noise noticeably above those generated by a normal Class A1 off-licence use. In addition, as set out in the preceding sections, the BottleDog store trades from 12pm (midday) until 9pm daily, and any activity associated with the proposed associated beer-tasting lounge will be limited to these hours and will not extend into the late evening. In any event, the proposed change of use relates solely to the basement and as such, any noise associated with customers sampling the BottleDog products on site will be contained within the building and will not therefore have any discernible impact either on neighbouring properties or on the wider area.

ii) Parking and traffic

- 5.9 Given the site's location in a densely populated area of Central London, close to London Underground stations and served by numerous bus routes, the



overwhelming majority of customers (and staff) visiting the premises do so either on foot or by public transport. Indeed, the site benefits from the highest Transport for London public transport accessibility level rating of 6B. As such, it is highly unlikely that the proposed change of use will have any adverse impact on parking conditions or traffic levels in the area.

- 5.10 Delivery arrangements will remain as existing and the proposed change of use will not therefore have any impact on these. The majority of deliveries (involving a small number of cases) are carried out in small vans, with 1 large delivery from Brewdog per week, arriving at around 10am on Thursdays. Deliveries are undertaken via on-street loading areas.
- 5.11 Refuse collections are carried out by the London Borough of Camden, and separated into recyclable and non-recyclable waste.

c) Impact on the listed building and the Bloomsbury Conservation Area

- 5.12 As set out above at Section 3, this application solely proposes the change of use of the basement level of 69 Gray's Inn Road. No external alterations or extensions to the building are proposed and the application proposals will therefore have limited visual impact on the Bloomsbury Conservation Area.
- 5.13 Notwithstanding this, it is important to note that the space in question is located within a prominent historic building. The basement is currently vacant and underused. The proposed change of use will facilitate the space being brought into a productive use that will enhance the overall BottleDog offer and help to ensure the long-term, continued viable use of the building. Furthermore, it will contribute to the character, vitality and diversity of this part of the Conservation Area, where this type of retail-focused, commercial use is prevalent.
- 5.14 The NPPF specifically emphasises the desirability of putting heritage assets to viable uses and ensuring that uses contribute to the character and distinctiveness of the area and the asset in question. The proposed change of use clearly fulfils these objectives and will help to meet national and local objectives for the preservation and enhancement of both the listed building and the Bloomsbury Conservation Area. It is therefore considered to be acceptable in heritage terms.



SECTION 6: DESIGN AND ACCESS STATEMENT

a) Use

- 6.1 The unit in question benefits from a flexible use for either Class A1, A2 or B1(a) use, but is currently largely vacant and used informally as ancillary back of house office / storage space. This application seeks consent for the use of the basement for Class A4 purposes as a beer-tasting lounge that will directly serve the customers of the existing Class A1 “BottleDog” beer store at ground floor level. This use will help to maximise the efficient use of the site.

b) Amount and Scale

- 6.2 This application solely relates to the proposed change of use of the basement level of the building. No extensions or external alterations to the building are proposed, and the overall scale of the building will not therefore be affected.

c) Layout

- 6.3 The layout of the premises is detailed on the proposed plan, Drawing No. 100 Rev. C. The basement space will be accessed internally via the existing staircase down from the Class A1 retail space at ground floor. It will incorporate seating along with customer WCs, and a limited amount of ancillary storage / office space.

d) Appearance

- 6.4 No external alterations to the building are proposed. Its external appearance will not therefore be affected. However, the existing “BottleDog” store provides an active use that contributes to the vibrancy, appearance and character of the area, and the proposed change of use will help to enhance this offer.

e) Landscaping

- 6.5 The proposed change of use will have no impact on landscaping.

f) Access

- 6.6 The beer tasting lounge will be accessed internally via the staircase from the ground floor of the unit.



SECTION 7: CONCLUSIONS

- 7.1 This Statement is submitted in support of a planning application to allow for the use of the basement floor of 69 Gray's Inn Road, London as a Class A4 beer-tasting lounge. This will be operated in association with and form part of the existing Class A1 "BottleDog" beer store which trades from the ground floor of the building.
- 7.2 This statement has demonstrated that:
- The premises are situated in a prominent, commercial stretch of the Central London CAZ, where planning policies support the provision of retail, food and drink and town centre uses. The proposed change of use will help to fulfil London Plan and Camden planning policy objectives for this location. It is therefore acceptable in principle, subject to ensuring that there is no detrimental impact on amenity;
 - The site is located in a busy, commercial location and the proposed change of use relates solely to the basement space. As such, the proposals will not have any discernible detrimental impact on neighbours, or on the amenity of the wider area;
 - The NPPF highlights the importance that local authorities should attach to supporting the needs of businesses, and highlights the importance of putting heritage assets to viable uses. By supporting the proposed change of use, the Council will help to enhance the overall offer and viability of this prominent Grade II-listed Central London building, ensuring that it is put to its maximum efficient use and will complement and enhance the character of the area, helping to serve and attract visiting members of the public.
- 7.3 In the light of the above, it is our view that the application proposals fully accord with all of the relevant adopted and saved planning policies at both national and local level, and are acceptable in all respects. We therefore respectfully request that planning consent is granted.



APPENDIX 1



ABOVE: BottleDog, Gray's Inn Road frontage

BELOW: The store stocks over 400 craft beers for retail sale, along with associated merchandise





ABOVE: Home-brew equipment and ingredients are also sold from the store

BELOW: The products sold are premium and targeted at those who appreciate craft beers rather than for mass consumption, which is reflected in the pricing



APPENDIX 2

BOTTLEDOG BEER STORE PROJECT

PROJECT SUMMARY

To create an environment where customers can shop for the finest, specialist craft beers from around the world whilst being able to sample and appreciate the product on site, interact with our team of experts, participate in educational events or read a book from the beer library. The atmosphere and ethos will be pro-actively educational, promoting a culture of beer appreciation.

BRANDING



INFLUENCE

City Beer Store – San Francisco

Opened in 2006 by Craig and Beth Wathen, City Beer Store set out to build a retail experience for beer which took all the elements from wine retail and adapted them to create a fresh and refined experience.

They source the finest beer from all over the U.S. and Europe, and train their staff to be able to discuss the beers with the discerning customers they attract.

A focus on education and individual customer service has meant they have elevated the beer buying experience from stopping off at the supermarket for a six pack, to something that is now considered an educational and cultured experience for both enthusiasts and beginners alike.



Naturally, the store trades without any kind of environmental impact.



CITY BEER STORE,
SAN FRANCISCO

ACTIVITIES

All activities focussed towards beer education and appreciation with tastings, classes, beer launches and events.

DRINKS SUMMARY

Over 400 of the finest bottled craft beers from around the world , hand-picked by our in-house buyer. A constantly changing selection of the highest quality, freshest, artisanal products available in the market.

Beer sampled on site would come in measures no larger than 2/3 of a pint.

PRICING

Our offer of beers is premium priced and targeted at those who appreciate craft beers. This is quite the opposite of popular packs of beer purchased at local supermarkets.

BrewDog has an existing retail site in Grays Inn Road. The average price for a bottle of beer in that site is over £6. Prices will range from around £2 for one of our own low ABV beers to up to £50 for a high end guest beer.

As a condition of the licence of our existing retail outlet we have a minimum pricing of 50p per unit of alcohol. We are more than happy to offer this as a condition in the proposed Essex Road store.

STAFF EDUCATION AND TRAINING

A significant part our model is beer education and promoting the art of beer appreciation. All of our team are Certified Beer Servers and some are Certified Cicerone. These qualifications are recognised in the beer world as the equivalent of a sommelier programme for wine. BrewDog are the first company in the UK to endorse these courses however, it is widely known and respected in the U.S.

All of our team also go through an intensive four day training programme with our training department which is a comprehensive induction to the company, our ethos and responsible operation of our retail outlets.

CUSTOMER EDUCATION

Our reason for existing is to make people as passionate about craft beer as we are. Our main outlet for this is educational events. We regularly hold tastings, classes, masterclasses, beer and food matching events and brewing seminars. These events are the core of what we do. In Essex Road, we will run a regular and comprehensive programme of such events.

