



31-32 & 33-34 ALFRED PLACE

PLANNING STATEMENT

August 2015

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Contents

1.0 INTRODUCTION.....3

2.0 SITE AND SURROUNDINGS.....5

3.0 PLANNING HISTORY6

4.0 THE PROPOSALS.....7

5.0 PRE APPLICATION PROCESS8

6.0 PLANNING POLICY.....9

7.0 PLANNING POLICY ASSESSMENT11

8.0 CONCLUSIONS.....16

1.0 INTRODUCTION

1.1. This Planning Statement has been prepared by DP9 Limited and is submitted in support of a planning application for full planning permission on behalf of Knighton Estates Ltd. (the “Applicant”) for the property at 31-32 and 33-34 Alfred Place, London, WC1E 7DP.

1.2. The planning application seeks full planning permission for:

“Alterations to the existing building, including: new ground floor shopfronts, the creation of accessible terraces at fifth and seventh floor levels, a new cycle store at ground floor level, installation of rooftop plant enclosures and external ventilation ductwork, the creation of a light well and associated works”.

1.3. The above proposals are referred to in this Statement as “the Development”.

1.4. This Statement assesses the planning considerations associated with the Development in the context of national, regional and local planning policy and guidance. Section 6.0 of this Statement provides an overview of the main planning policy and guidance documents relevant to an assessment of the Development

1.5. The application comprises the following documents which form part of the application:

- Signed and dated planning application forms including Certificate B, dated 3rd August 2015;
- Site Location Plan ref. P001, prepared by Ben Adams Architects
- Existing drawings, prepared by Ben Adams Architects:
 - Drawing ref. P099: Existing Basement Plan;
 - Drawing ref. P100: Existing Ground Floor Plan;
 - Drawing ref. P101: Existing First Floor Plan;
 - Drawing ref. P102: Existing Second Floor Plan;
 - Drawing ref. P103: Existing Third Floor Plan;
 - Drawing ref. P104: Existing Fourth Floor Plan;
 - Drawing ref. P105: Existing Fifth Floor Plan;
 - Drawing ref. P106: Existing Sixth Floor Plan;
 - Drawing ref. P107: Existing Seventh Floor Plan;
 - Drawing ref. P120: Existing Alfred Place Elevation;
 - Drawing ref. P121: Existing Rear Elevation;
 - Drawing ref. P130: Existing Section;
- Proposed drawings, prepared by Ben Adams Architects:
 - Drawing ref. P199: Proposed Basement Plan;
 - Drawing ref. P200: Proposed Ground Floor Plan;

- Drawing ref. P201: Proposed First Floor Plan;
- Drawing ref. P202: Proposed Second Floor Plan;
- Drawing ref. P203: Proposed Third Floor Plan;
- Drawing ref. P204: Proposed Fourth Floor Plan;
- Drawing ref. P205: Proposed Fifth Floor Plan;
- Drawing ref. P206: Proposed Sixth Floor Plan;
- Drawing ref. P207: Proposed Seventh Floor Plan;
- Drawing ref. P400: Proposed Alfred Place Elevation;
- Drawing ref. P401: Proposed Rear Elevation;
- Drawing ref. P401: Proposed Section;
- Design and Access Statement, prepared by Ben Adams Architects dated July 2015;
- Planning Statement, prepared by DP9 Limited, dated August 2015;
- Noise, vibration and ventilation assessment, prepared by Hann Tucker Associates and dated 24th July 2015;
- Sustainability Assessment, prepared by Norman Disney & Young and dated 31st July 2015.

1.6. This Statement is structured as follows:

- Section 2 describes the Site and its surroundings.
- Section 3 describes the planning history of the site.
- Section 4 describes the Development.
- Section 5 summarises the pre-application process.
- Section 6 highlights the main national, regional and local planning policy and guidance relevant to the determination of the application.
- Section 7 assesses the Development against relevant policy guidance and key tests.
- Section 8 sets out the conclusions.

2.0 SITE AND SURROUNDINGS

- 2.1. The property is located on the western side of Alfred Place and the immediate surrounding area is mixed in terms of use and character. The site is bound to the east by residential properties and to the west by a large office building, Whittington House. A university building is located to the rear of the site.
- 2.2. The sites lie within the Bloomsbury Conservation Area. The properties are not Listed.
- 2.3. The buildings provide approximately 5,500 sqm (GEA) of office accommodation arranged over basement, ground and seven upper floors. The buildings are dated and in need of upgrade to bring them back into productive use. The buildings are currently vacant and the proposed improvements will therefore ensure that the office floorspace is more desirable to potential commercial tenants.
- 2.4. The property has recently been subject of two planning applications by others; one for the demolition and redevelopment of the site for office and residential use; and the second for an office refurbishment with an additional roof extension. Please refer to section 3 for further details.

3.0 PLANNING HISTORY

3.1. The planning applications relevant to the site are set out in the table below.

Site Address	LPA ref.	Description of Development	Decision	Decision Date
31 Alfred Place	2014/6713/P	Erection of an additional storey at roof level and new entrance at ground floor level in association with the refurbishment of two office buildings to create a single office building (Class B1)	Resolution to grant planning permission on 23 rd December 2014, subject to S106 agreement	N/A
31-32 and 33-34 Alfred Place	2013/2048/C	Demolition of existing buildings [Conservation Area Consent].	Awaiting Decision	N/A
31-32 and 33-34 Alfred Place	2013/1978/P	Erection of a seven storey building with basement and terrace, for office use (Class B1) at basement to 5th floor level, and residential use (Class C3) at 6th floor level providing 4 self-contained flats (2 x two bedroom and 2 x 3 bedroom), and ancillary servicing and access arrangements (following demolition of existing buildings).	Resolution to grant planning permission, subject to S106 agreement	N/A
33-35 Alfred Place	PSX0204231	Installation of two wall mounted air-conditioning condensers within rear internal lightwell at first floor level.	Granted	16-04-2002
33-34 Alfred Place	PSX0104392	The installation of new doors to the entrance, and fascia recladding	Granted	03-07-2001
33-34 Alfred Place	PS9904126	Change of use to Class D1 (educational) personal to the college of law.	Withdrawn	N/A
31-32 Alfred Place	9201212	Change of use from Class B1 office to Class D1 educational facilities	Granted	21-01-1993
33/34 Alfred Place	9200480	Continued use for purposes within Class B1 (business use)	Granted	02-07-1992

4.0 THE PROPOSALS

4.1. The proposals include minor external alterations to and the refurbishment of the existing building. There are also a number of internal refurbishment works not requiring planning permission. The aspiration for the project is to substantially enhance the building to create high quality commercial floor space and includes the following alterations:

- The provision of new ground floor shopfronts;
- Creation of a lightwell;
- Alterations to streetfront pavement and existing loading bay area;
- The conversion of existing flat roofs to accessible terraces in the following locations:
 - 5th floor front at 31-32 including new access doors and railings
 - 7th floor front at 31-32 including railings
- The installation of new external ventilation ductwork to the light well;
- The installation of new rooftop plant enclosure;
- The creation of a new cycle store at ground floor with internal shower and locker facilities at basement level.

4.2. For further details please refer to the submitted drawings and Design and Access Statement.

5.0 PRE APPLICATION PROCESS

- 5.1. A pre-application meeting was held on site with Planning Officer Rob Tulloch of Camden Council on 26th June 2015. The proposals presented at the pre-application meeting involved more extensive alterations to the existing building.
- 5.2. Verbal feedback was provided at the meeting on a series of refurbishment options and the scheme has since evolved to incorporate more minor alterations and officer's comments have been taken on board where relevant and feasibly possible.

6.0 PLANNING POLICY

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when making any determination under the Planning Acts, it should be done so in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2. The Development Plan for the Site comprises the London Plan (2015), Camden's Core Strategy (2010), Camden's Development Policies (2010) and the Fitzrovia Area Action Plan (AAP) (2014).
- 6.3. The National Planning Policy Framework (NPPF) was published on 27 March 2012 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements. The NPPF sets out the Government's economic, environmental and social planning policies and is to have immediate effect on all planning decisions.
- 6.4. At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both the plan-making and decision-taking process. This means approving development proposals that accord with the development plan without delay, and where the development plan is absent, silent, or out-of-date, granting permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.
- 6.5. The NPPF is a material consideration when making a determination under the Planning Acts.
- 6.6. The London Plan sets out the strategic plan for London, for the period up to 2036. The London Plan encompasses the Mayor's economic, environmental, social and transport objectives for London over the next 20 years.
- 6.7. Camden Council's Planning Guidance Documents are also a material consideration and their content has informed this planning application.

Site Designations

- 6.8. The Site is identified within Camden Council's Policies Map (2010) as having the following designations:
- Conservation Area
 - Central London Area
 - Fitzrovia Area Action Plan

Emerging Policy

- 6.9. Camden Council consulted on the draft Camden Local Plan (2015) in Spring 2015. The Local Plan will replace the current Development Plan documents of the Core Strategy and the Development Policies as the basis for making planning decisions in the Borough.

7.0 PLANNING POLICY ASSESSMENT

- 7.1. The purpose of this Section is to assess the Development against key national, regional and local planning policy and guidance relevant to the determination of the application, and which the proposals have had regard to during design development.

Principle of Development

- 7.2. London Plan Policy 4.2 – *Offices* encourages the renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility.
- 7.3. Core Strategy Policy CS8 - *Promoting a successful and inclusive Camden economy* aims to “safeguard existing employment sites and premises in the borough that meet the needs of modern industry and other employers”.
- 7.4. The continued use and refurbishment of office accommodation on the site is in line with Camden’s keys aspirations for the borough which includes promoting a strong economy, as set out in Core Strategy and Development Management policy documents. The discrete refurbishment measures seek to modernise and improve the overall appearance, appeal, and marketability of the office accommodation by bringing it in line with modern tenant expectations. This is directly in accordance with the requirements of policy CS8.

Design

- 7.5. The NPPF considers that “good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”.
- 7.6. The NPPF further states that “in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area”.
- 7.7. London Plan Policy 7.6 requires buildings to be of the highest architectural quality. The policy sets out design principles, which include maximising the site potential and promoting high quality inclusive design.
- 7.8. Camden Core Strategy Policy DP24 – *Securing High Quality Design* expects all developments, including alterations to existing buildings, to be of the highest standard of design. Developments will be expected to consider a range of matters including, inter alia, the character and proportions of the existing building, where alterations and extensions are proposed and the provision of visually interesting frontages at street level.

- 7.9. The Fitzrovia Area Action Plan (AAP) asserts that ground floor uses should create safe, attractive streets by fronting active uses or windows and entrances to the street.
- 7.10. The Fitzrovia AAP sets out design principles for the Alfred Place character area, which the site lies within. One of the principles includes new development improving the frontage and pedestrian environment.
- 7.11. The proposals seek to provide office accommodation of the highest quality internally and externally and improve the functioning of the building. The proposals aim to secure the long-term future use of the site, by ensuring it is attractive, sustainable and functional. The external modifications are very minor in nature, and will enhance the character of the existing building and be of the highest quality design, in accordance with national, regional and local policy requirements. The new ground floor frontage will activate the streetscape, in line with Policy DP24 and the Fitzrovia AAP.
- 7.12. The planning application ref. 2013/1978/P, which has a resolution to grant planning permission, sets a precedent in design terms as the application sought to provide external amenity space at fifth and sixth floor levels and also provide light and open ground floor frontages to maximise visual permeability and engage with the public realm. These principles, which have been established by the previous application, accord with the objectives of this application, which include promoting an active frontage at ground floor level and providing valuable amenity space for users of the building.

Heritage

- 7.13. Paragraph 128 of the NPPF requires applicants to describe the significance of any heritage assets affected by a development. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 7.14. London Plan Policy 7.8 – *Heritage Assets and Archaeology* advises that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 7.15. Core Strategy Policy CS14 - *Promoting high quality places and conserving our heritage* requires development of the highest standard of design that respects local context and character and which preserves and enhances Camden's heritage assets, including conservation areas.
- 7.16. Development Policy DP25 - *Conserving Camden's Heritage* will only permit development within Conservation Areas that preserves and enhances the character of the area.

- 7.17. In relation to small scale non-residential development, such as this development, the Bloomsbury Conservation Area Appraisal (2011) requires attention to detailed design and high quality smaller alterations. The Appraisal asserts that small but insensitive changes can harm the character and appearance of the area to an extent belied by their individual scale.
- 7.18. The Bloomsbury Conservation Area Appraisal describes 31-32 and 33-34 Alfred Place as “neutral elements in the streetscape”.
- 7.19. The existing building is not noteworthy or of any particular merit and makes a “neutral” contribution to the Conservation Area, which was confirmed by planning officers in the pre-app meeting. This development presents an opportunity to make better use of the existing building and improve the ground floor frontage, which currently presents an inactive frontage to the street. The proposed alterations are very minor in nature and the upgrading of the ground floor would improve the appearance of the building and enhance the conservation area.
- 7.20. These proposals are therefore in accordance with the requirements of Local Policies CS14 and Development Policy DP25 in presenting an opportunity to improve the functionality of the existing building, enhance the building’s contribution to the character of the Conservation Area whilst ensuring its long term sustainable use as office accommodation.

Amenity

Privacy and Overlooking

- 7.21. Core Strategy Policy CS5 – *Managing the impact of growth and development* protects the amenity of Camden’s residents and those working in and visiting the borough by ensuring a development’s impact are fully necessary, balancing the needs of development with the needs of local communities and requiring mitigation measures where necessary
- 7.22. Development Management Policy DP26 – *Managing the impact of development on occupiers and neighbours* states that the Council will only grant permission for development that does not cause harm to amenity and will consider factors such visual privacy and overlooking.
- 7.23. The accessible terraces will provide valuable amenity space for the users of the building. The terraces have been sensitively designed and positioned to ensure that the impact upon the amenities of residential occupiers is minimised and that there will be no overlooking to residential properties.

Noise

- 7.24. Development Policy DP28 – *Noise and vibration* asserts that the Council will only grant permission for plant or machinery if it can be operated without cause harm to amenity and does not exceed our noise thresholds.
- 7.25. The Noise and Vibration Assessment, prepared by Hann Tucker Associates, and accompanies that application, proposes limiting plant noise levels to ensure that plant machinery does not exceed Camden’s noise thresholds and therefore will not have a detrimental impact on amenity.

Cycle Provision

- 7.26. London Plan policy 6.9 – *Cycling* requires development to provide secure, integrated, convenient and accessible cycle parking facilities in line with minimum standards and provide on-site changing facilities and showers for cyclists.
- 7.27. Core Strategy Policy CS11 – *Promoting sustainable and efficient travel* aims to continue to improve facilities for cyclists, including increasing the availability of cycle parking.
- 7.28. Supporting text contained at paragraph 11.13 of the Core Strategy seeks to ensure that all opportunities are taken to maximise the availability of new cycle parking both in new developments and more widely in any areas where there is need for increased provision.
- 7.29. Development Policy DP17 – *Walking, cycling and public transport* asserts that development should make suitable provision for cyclists, which may include high quality cycle parking, workplace showers and lockers.
- 7.30. As part of the refurbishment of the existing building, this application proposes the installation of new cycle store at ground floor with internal shower and locker facilities at basement level. The proposal accommodates 70 cycle parking spaces and the provision of cycle parking will ensure the development is more sustainable, accessible, inclusive and meets the requirements of a modern office user.

Sustainability

- 7.31. Core Strategy Policy CS13 – *Tackling climate change through promoting higher environmental standards* encourages all development to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 7.32. Development Policy DP22 – *Promoting sustainable design and construction* requires development to incorporate sustainable design and construction measures. Schemes must demonstrate how sustainable development principles are integral to the design and proposed implementation.

- 7.33. This application is accompanied by a brief sustainability assessment, prepared by NDY. As the proposed alterations are very minor in nature, the report demonstrates that the requirement to investigate whether an upgrade of the facade and thermal performance is required as part of consequential improvements to part L2B, is not applicable in this case.

8.0 CONCLUSIONS

8.1. The Development seeks to undertake minor external alterations in connection with the refurbishment of the building in order to markedly improve the quality of the commercial floorspace. It has been designed having regard to national, regional and local planning policy and guidance and fully accords with all levels of policy.

8.2. The Development will provide a significant number of benefits which are outlined below:

- Optimising the potential of the site and securing its long-term use as successful office accommodation, in accordance with Policy CS8;
- The provision of high quality office accommodation, in line with the requirements of Policy CS8 and DP24 as well as national and London Plan policies;
- Enhancing the existing offer which will appeal to a wider range of commercial tenants;
- Improving the cycling facilities for existing occupiers, which contributes towards a more sustainable and inclusive development;
- The accessible terraces will provide valuable amenity space for the users of the building and make the office floorspace more marketable to ensure it is brought into use and provides jobs into the local economy;
- Improving the attractiveness of the building through a creating an active ground floor frontage, enhancing the Conservation Area;
- Enhancing the external appearance of the building with the provision of a plant enclosure, and;
- Ensuring the amenity of neighbouring occupiers is not materially harmed.

8.3. For the reasons outlined in this Statement, we invite the Council to support the proposals and grant planning permission.

