



# Report

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## 9-13 Grape Street, London WC2H 8ED Planning Statement

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## 1. Introduction

- 1.1 This Planning Statement has been prepared by Bilfinger GVA on behalf of VBL Real Estate Ltd (“the applicant”) in support of an application for full planning permission for the redevelopment of 9-13 Grape Street, London WC2H 8ED.
- 1.2 The application is submitted to the London Borough of Camden. This statement demonstrates the planning case in support of the application in the context of relevant planning policies, and relevant planning history.
- 1.3 The proposed development involves the change of use of the currently vacant commercial building to office use, including a roof extension. The description of the proposed development is set out below:

*“Erection of a roof extension and change of use from office and photographic studios, gymnasium, and gallery (together comprising a Sui Generis Use), to offices (Class B1a) and associated works.”*

### Supporting information

- 1.4 This planning statement should be read in conjunction with the associated application forms and certificates, drawings, covering letter, and the following supporting documents:
- Design & Access Statement (Robin Partington & Partners)
  - Office Market Overview Report (BNP Paribas)
  - Townscape, Heritage & Visual Impact Assessment (Citydesigner)
  - Energy Statement (Scotch Partners)
  - Sustainability Statement (Scotch Partners)
  - BREEAM pre-assessment report (Scotch Partners)
  - Sunlight & Daylight report (GIA)

- Acoustic Report (Sandy Brown)
- Draft Construction Management Plan (Paragon Building Consultancy)
- Statement of Community Involvement (Quatro)

#### **Pre-application consultation**

- 1.5 The proposed development has been subject to pre-application consultation with Camden in order to establish the acceptability of the principles of the proposed development.
- 1.6 The project team have also engaged with the local community as part of the pre-submission design evolution process. A Statement of Community Involvement, prepared by Quatro, provides further details of the consultation exercises undertaken and is submitted in support of this application.

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## 2. Site and Surroundings

- 2.1 9-13 Grape Street is not listed but lies within the Bloomsbury Conservation Area, and is identified as making a positive contribution to the Conservation Area by the Bloomsbury Conservation Area Appraisal. There are listed buildings within the vicinity of the site, including the Grade II\* listed Shaftesbury Theatre immediately to the south of the site.
- 2.2 Grape Street is a narrow period street, enclosed by buildings on both sides. The facades facing Grape Street are predominantly fenestrated with detailed window treatments in terracotta and red brick. The site is located on the east side of Grape Street bounded by properties to the north and south, with the rear backing onto the access ramp of a car park with West Central Street further behind.
- 2.3 The building itself is a west-facing single-aspect commercial property arranged over lower ground, ground, first, second and third floor levels.
- 2.4 The building is vacant, the last occupier having vacated the premises in 2013. The building continues to lie vacant, despite unsuccessful attempts to market it.
- 2.5 The building previously comprised a mix of uses – namely office and photographic studios (Class B1), gymnasium (Class D2) and gallery (Class D1) – but this operated under a single Sui Generis Use planning unit, established by the planning permission in 2009 which rationalised the (then) arrangement of uses within the building.
- 2.6 The site benefits from excellent public transport links and is situated within a PTAL rating of 6b (the highest). Tottenham Court Road and Holborn Station tube stations are located within walking distance of the site, together with six bus stops within the immediate vicinity of the site.

### 3. Planning History

- 3.1 Of principal relevance to this pre-application enquiry is the granting of planning permission dated 31 March 2015 (ref. 2015/0695/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 Class B1 at basement level and Class B1/A1 at ground floor level with 6 x residential units on part ground and upper floors (Class C3) and associated works."
- 3.2 This planning consent establishes the principle of the change of use of the building from its current Sui Generis Use, and the construction of a roof extension to the property.
- 3.3 A full schedule of the planning history for the property is as follows:

Reference	Description	Status
2015/0695/P	Erection of roof extension and change of use from office and photographic studios (Class B1), gymnasium (Class D2) and gallery (Class D1) to Class B1 at basement level and Class B1/A1 at ground floor level with 6 x residential units on part ground and upper floors (Class C3) and associated works.	Granted subject to S106 on 31.03.2015
2014/5566/P	Erection of roof extension and change of use from office and photographic studios (Class B1), gymnasium (Class D2) and gallery (Class D1) to 8 (6 x 2 bed and 2 x 3 bed) residential units (Class C3), replacement of rooftop plant and associated works.	Withdrawn 11.2014
2013/7894/P	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.	Refused 12.05.2014
2012/5156/P	Erection of a mansard roof extension to create a new fourth floor comprising 3 x bedroom self-contained unit (Class C3), and associated re-installation of 5 x air conditioning units, re-instatement of 2 x chimney stacks	Withdrawn 10.2012

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	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.	
2009/0636/P	Retention of use from office to a mixture of uses comprising office and photographic studios (Class B1), gymnasium (Class D2) and gallery (Class D1) and the proposed installation of a roller shutter on the entrance of the Grape Street elevation.	Granted 01.06.2009

- 3.4 Also of relevance is a recently granted planning permission dated 26.02.16 at 15 Grape Street (ref. 2015/4205/P) which proposed a roof extension to provide additional office space (Class B1a).

## 4. Proposed Development

- 4.1 The existing building has been vacant since 2013, despite previous unsuccessful attempts to market it. As a result of this continuing vacancy, planning permission was granted in March 2015 to change the use of the upper floors to residential use, retaining B1/A1 commercial floorspace at lower ground and ground floor level.
- 4.2 The site has subsequently changed ownership in the interim, and the London office market has experienced an increase in demand for high quality, bespoke office accommodation.
- 4.3 The proposal seeks to retain the existing commercial floorspace within the building, providing new modern office accommodation throughout.
- 4.4 In land use terms, the proposal comprises the change of use from Sui Generis Use – comprising office and photographic studios (Class B1), gymnasium (Class D2) and gallery (Class D1) – to offices (Class B1a).
- 4.5 A roof extension is proposed at fourth floor level which sits behind the retained parapet of the building. Careful attention has been paid to the design of the scheme, and the building's relationship with nearby properties. Fritted glass is proposed on the windows to the front elevation.
- 4.6 The roof extension provides an additional 124sqm (GIA) of office accommodation. 1,125sqm (GIA) of new B1 office floorspace is proposed in total. A breakdown of the existing and proposed floorspace is shown below:

	Existing floorspace (Sui Generis Use)	Proposed floorspace (Office (B1) Use)	Difference
GEA	1,240sqm	1,444sqm	+ 204sqm
GIA	1,001sqm	1,125sqm	+ 124sqm

- 4.7 An internal bicycle store for 16 spaces is located at ground floor level at the south of the site, accessed directly from the street. No vehicle parking spaces are proposed.



- 4.8 Dedicated space for refuse and recycling is located at lower ground floor level. On collection days this will be brought up to ground floor level and temporarily stored in the bicycle store.
- 4.9 A new staircase and lift providing direct access to all floors is located within a central core. A concierge will be located at ground floor level within the new shared entrance to the building, with direct level access from the street.

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## 5. Planning Considerations

- 5.1 The 2004 Planning & Compulsory Purchase Act requires that determination of any planning application must be in accordance with the development plan, unless material considerations indicate otherwise
- 5.2 In this case the development plan comprises the London Borough of Camden's Core Strategy, Camden Development Policies Documents, and Camden Planning Guidance documents. The London Plan is also part of the Development Plan, and the National Planning Policy Framework (March 2012) are also of relevance
- 5.3 The following section sets out the considerations of the proposed development in relation to planning policy and guidance under the following headings:
- Land Use
    - Loss of existing Sui Generis use
    - Proposed office use
    - Approach to mixed use policy
  - Design
    - Principle of additional storey
    - Façade alterations
  - Amenity
    - Sunlight & daylight
    - Internal amenity
    - Privacy & overlooking
    - Noise
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- Sustainability
- Transport & servicing

## Principle of Redevelopment

5.4 The redevelopment of the site is supported by the NPPF, which adopts a presumption in favour of sustainable development and encourages the effective use of brownfield land. The principle of redevelopment is also supported by the London Plan, which seeks to support and manage growth across London.

## Land Use

### (i) Loss of existing use

- 5.5 The site is currently a Sui Generis Use (albeit vacant) comprising offices, photographic studios, a gymnasium, and gallery. Any new proposal will require planning permission due to a change of use being required – the 2009 consent which established the Sui Generis Use reflected the specific circumstances of the site (the nature of the occupier) at the specific time.
- 5.6 However, notwithstanding the special circumstances of the site, there are no policies which protect 'Sui Generis' uses.
- 5.7 Furthermore, it is also necessary to make the assessment of the acceptability of the change of use in the context of the March 2015 planning permission (ref. 2015/0695/P) which established the principle of the loss of the individual elements comprising the wider sui generis use.
- 5.8 It has been previously demonstrated there is no demand for the existing unique configuration of uses at the site, whereby the building has been unsuccessfully marketed in the past and the site continues to remain vacant. The Council have previously accepted the specific circumstances and challenges this site presents in allowing the loss of this sui generis use, subject to the acceptability of the proposed use.
- 5.9 The building has been vacant for approximately 3 years, and planning policy at all levels – and enshrined in the NPPF as a presumption in favour of sustainable

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development – seeks to make the most efficient use of land and buildings, bringing vacant or underused sites back into use.

(ii) Proposed office use

- 5.10 The NPPF highlights how planning should “drive and support sustainable economic development” (paragraph 17), and paragraph 19 goes further, stating how the system should do everything it can to support sustainable economic growth.
- 5.11 London Plan Policy 4.2 supports the redevelopment of office provision in order to improve London’s competitiveness. It encourages the renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility, and seeks increases in the current stock where there is authoritative, strategic and local evidence of sustained demand for office-based activities.
- 5.12 At the local level, as a starting position Policy CS8 of Camden’s Core Strategy seeks to secure a strong economy in Camden and seeks to support Camden’s industries by safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and employers.
- 5.13 Policy DP13 of Camden’s Development Policies continues, stating that the Council will retain land and buildings that are suitable for continued business use.
- 5.14 The proposed development seeks to provide 1,125sqm (GIA) of office floorspace, which is supported at all levels of planning policy.
- 5.15 The proposed replacement office accommodation will be a qualitative improvement on the existing redundant, out-dated commercial space, with the new offices being targeted to provide better quality space in a highly sustainable location.
- 5.16 Whilst each application should be considered on its merits, we are aware of the March 2015 consent which approved the change of use from Sui Generis commercial space to residential use. The accompanying letter from BNP Paribas highlights recent shifts in the office market in this area for this type of premises, and states:

*“The London Office Market is currently struggling with a shortage of supply. This shortage of supply is most prominent in floor plates of sub 5,000 sq ft. Due to the lack of supply, small to medium size businesses seeking space in Central*

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*London are struggling to find suitable accommodation, particularly in the West End & Midtown, where supply has reached historic lows.*

*The proposed refurbished B1 office accommodation will bring much needed supply into a market, which is currently deprived of good quality refurbished office units of sub 5,000 sq ft. Because of the lack of supply and continued strong occupier demand, we believe that the refurbished scheme will secure a letting(s) before or soon after completion of the Cat A works, assuming the market fundamentals remain strong. A fully refurbished office scheme will ensure retaining quality tenants in the long turn, in turn improving the local area."*

- 5.17 The proposal is therefore addressing an identified need for B1 commercial floorspace, contributing towards the policy objectives outlined above. This is in accordance with Paragraph 17 of the NPPF (3rd bullet) which states that planning should take account of market signals.
- 5.18 The proposal will contribute to the vitality, function and success of this part of Camden, within the Central Activities Zone, and contribute to London's role as a major global city, creating new jobs in the Borough.
- 5.19 The Council's pre-application response echoes this, and states with regards to the principle of the change of use:

*"In accordance with policy DP13 (specifically paragraph 13.1), the proposal would again provide a specific, affordable and valued commercial use to the Central Active Zone (CAZ).*

*The provision of 'new' office floorspace is supported as it would ensure the longevity of the commercial use on the site, increase employment levels within the borough and promote economic growth in accordance with planning policy.*

*A supporting financial assessment, prepared by BNP Paribas, demonstrates the commercial element is appropriate to meet the likely needs of the end user, namely small to medium sized businesses.*

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*The proposal and building would therefore continue to contribute to the success of the CAZ and London's role as a major global city, and providing the majority of jobs in Camden in accordance with the aims of policies DP13, CS1, CS2, CS8 and CS9."*

- 5.20 Accordingly, the principle of a change of use to provide new office accommodation to cater to an identified need is in accordance with planning policy,

**Approach to mixed use policy**

- 5.21 Camden's Development Policy DP1 states that the Council will require a mix of uses in development – where appropriate – including a contribution towards the supply of housing.
- 5.22 Where more than 200sqm (gross) additional floorspace is provided, up to 50% of all additional floorspace will be required to be housing in the first instance.
- 5.23 On the basis that the proposed roof extension will generate 204sqm (GEA) net additional floorspace, and the development site is located within the Central London Area, this policy requirement is therefore triggered
- 5.24 In the first instance the policy requires any secondary uses to be provided on site, particularly where 1,000 sqm (gross) of additional floorspace or more is proposed. Where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the policy outlines that a contribution to the mix of uses elsewhere in the area, or exceptionally, a payment in lieu, may be acceptable.

(i) Assessment: appropriateness of on-site provision

- 5.25 In considering whether a mix of uses should be sought, whether it can practically be achieved on the site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing and other secondary uses, the Council will take into account each of the identified tests below.
- 5.26 As a starting point, due to the development generating additional floorspace in the region of 204sqm, Policy DP1 requires 50% of this floorspace to be provided as residential.

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- 5.27 This analysis below sets out reasoned justification as to why it is not considered appropriate to incorporate 102sqm of residential use as part of the proposals at 9-13 Grape Street, taking each test in turn.
- 5.28 It should also be noted that this policy assessment was the focus of the follow-up pre-application enquiry with Camden in January 2016, and its conclusions have been accepted by the Council. The reasoned justification previously considered by the Council is set out below.

*a) The character of the development, the site and the area;*

- 5.29 Grape Street is a predominantly commercial street in character. Recently, the supply of office space in the West End and Midtown has fallen to historic lows, and this surge in demand of office space for small and medium sized businesses suggests that the provision of refurbished office space will secure a letting(s) before or soon after competition of the development, based on current market predictions.
- 5.30 A wholly commercial scheme is proposed, providing B1(a) office floorspace to meet this demand in a building that is commercial in character. A small residential unit would compromise the development opportunity of this site, resulting in an awkward configuration of uses and compromised floorspace. This is discussed further below.

*b) site size, the extent of the additional floorspace, and constraints on including a mix of uses;*

- 5.31 With the scheme's main focus being the provision of an open plan, modern, flexible working environment, the inclusion of a residential unit on the site would severely compromise the development proposal, restricting the quantum and quality of the office and residential floorspace.
- 5.32 The floorplate of the building is such that the layout is narrow, with the only source of natural light coming from the windows fronting Grape Street. Due to these constraints, finding a suitable location within the building for the residential unit whilst not compromising the design of the office floorspace is very challenging: the ground floor or lower ground floor is considered inappropriate for a residential unit, having regards to the character of the street and the appearance of the building, and the building becomes compromised when attempting to provide 104sqm of residential floorspace on the upper floors. The additional core required when providing residential units

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restricts the amount of floorspace available in an already limited site, which necessitates a separate entrance and circulation core.

*c) the need for an active street frontages and natural surveillance;*

- 5.33 The building is single-sided, whereby a residential unit at ground floor level would not contribute to the commercial character and appearance of the building or the street.
- 5.34 The proposed development would allow for the building to embrace and enhance the streetscene by introducing an active commercial frontage which would include office accommodation and the main entrance, including the lobby to the upper floors of the building.
- 5.35 The existing floor to ceiling glazing of the building – which will be utilised by the proposed development – will allow for visibility into and out of the office building, which will bring added movement, life, vibrancy and character into the streetscene and area. Something which a residential unit at ground floor level would not.
- 5.36 Furthermore, residential elevations on the ground floor facing directly onto the streetscene – the building's only frontage – would be inappropriate; it would create windows immediately adjacent to the public footway of this narrow street, with no defensible space. It would ultimately result in harm to residential amenity in terms of noise and privacy for any residential unit to be located at ground floor / lower ground floor level.

*d) the economics and financial viability of the development including any particular costs associated with it;*

- 5.37 Given the impracticalities of delivery of residential accommodation, it is not considered reasonable to test this.
- 5.38 However, it should be noted that any scheme attempting to incorporate residential on site would need to consider this on the upper floors which, as set out above, severely compromises the commercial floorspace within the building both in terms of the amount and the configuration, adversely affecting the viability of the scheme and the ability to deliver c.1200sqm of high quality office accommodation in this central London location to meet an identified need.



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*e) whether the sole or primary use proposed is housing;*

5.39 No housing is proposed as part of the development.

*f) whether secondary uses would be incompatible with the character of the primary use;*

5.40 In order to provide residential accommodation within the existing building, embedded within the proposed office use, a separate dedicated entrance and core would be needed. This would compromise the quantum and quality of the office accommodation (as discussed in detail above) and would adversely affect the character of the primary use. Whilst it is acknowledged that, in certain circumstances, office and residential uses can sit side by side, this is a constrained site where only 104sqm of residential floorspace is under consideration for the purposes of this assessment under planning policy (i.e. a small, single unit).

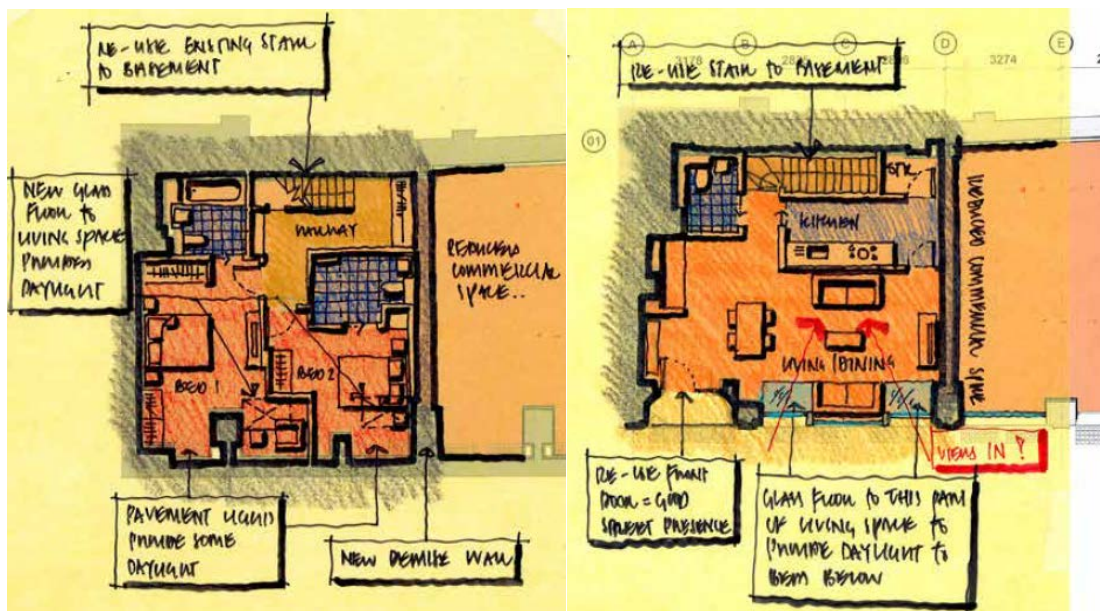
5.41 Two options were designed when considering the feasibility of providing on site residential units. The drawings on the next page reflect the 2 options that Robin Partington & Partners have considered and the respective outcomes for each. In both scenarios, a significant level of potential commercial floorspace is lost to accommodate the residential unit and its separate core.

5.42 It should also be noted that, as set out above, this policy assessment formed the focus of the follow-up pre-application enquiry with Camden in January 2016, and these sketches have been previously seen by the Council.

(i) Apartment at lower levels

5.43 The sketches on the next page demonstrate how providing a residential unit at lower ground & ground floor level is inappropriate due to the insufficient levels of available natural light. The only natural light available to this unit is through a single-aspect window fronting immediately onto the street at ground floor level. This gives rise to issues relating to loss of privacy, security, and noise and disturbance from the street.

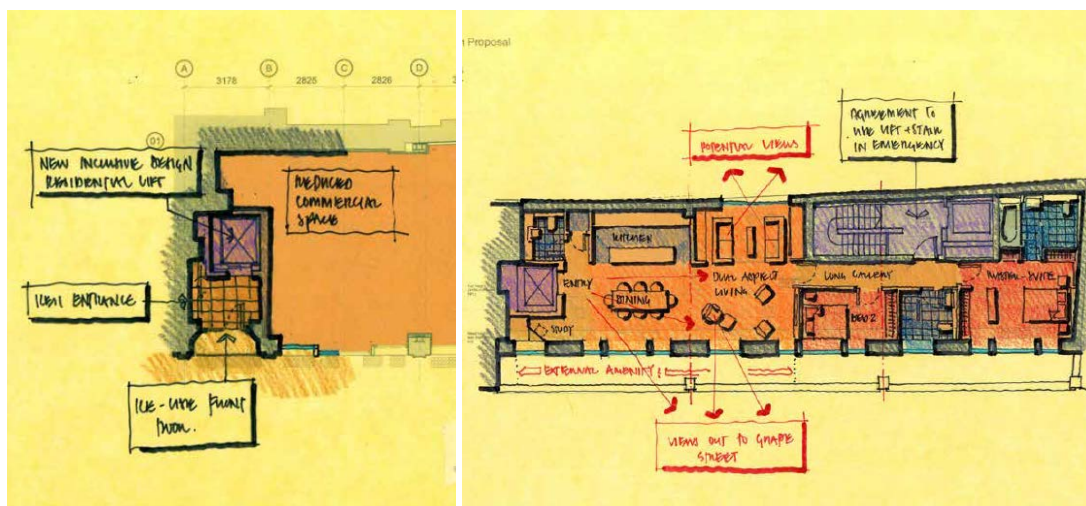
5.44 Furthermore, the unit would be embedded within commercial uses on 3 sides (north, south, and above), creating potential conflict with regards to noise and disturbance.



Lower ground floor (above left) and ground floor (above right)

(ii) Apartment at upper levels

5.45 In addition to the issues surrounding conflict with adjacent uses outlined above, this scheme would need to provide an additional core in order to provide separate entrances. The main office core would be used in emergencies, a solution which is far from ideal.



Ground floor entrance (above left) and top floor (above right)

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5.46 The commercial floorspace is compromised on each floor throughout the building, reducing the availability of open plan, flexible spaces for small and medium sized businesses that this proposal is targeted at. It would significantly reducing the site's market potential and attractiveness, adversely affecting the character of the proposed development, and ultimately compromise the viability of the scheme.

5.47 This is discussed in greater detail in the letter prepared by BNP Paribas which accompanies this application.

*g) whether an extension to the gross floorspace is needed for an existing user;*

5.48 The building has been vacant since 2013, and a change of use is proposed. The additional floorspace is needed for the *proposed* user.

*h) whether the development is publicly funded;*

5.49 The development is not publicly funded.

*i) any other planning objectives considered to be a priority for the site*

5.50 As the site is situated in both the Central London Area and Tottenham Court Road Growth Area, the proposed office use is supported at all levels of planning policy.

5.51 In summary, it is not possible to accommodate a mix of uses on the site without severely compromising the viability of the scheme and attractiveness to future tenants, for reasons noted above.

(ii) Assessment: appropriateness of off-site provision

5.52 Policy DP1 advises that if it is satisfactorily demonstrated that accommodation of a mix of uses on site is not appropriate for a particular site, then the Borough's next preference is for the provision of residential use to be made elsewhere in the area.

5.53 The applicant does not own any other sites within the search area. Accordingly, an off-site housing site search has been undertaken with the purpose of identifying a suitable and deliverable housing site by BNP Paribas Real Estate.

5.54 Whilst it is noted that the Borough has limited published guidance available on the undertaking of an off-site housing site search, in the first instance it has been agreed

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- during pre-application discussions that the search area should comprise the Holborn and Covent Garden Ward.
- 5.55 It should also be noted that the wider methodology and subsequent results set out within the BNP Paribas letter has been agreed with the Council at the pre-application stage.
- 5.56 The search was focused on sites that could provide a policy compliant level of floor space within the search area. However, due to the lack of properties available for purchase at a market rate that reflects the policy-compliant required provision, the search area was extended beyond the Ward, ultimately having to be extended beyond the Borough.
- 5.57 The current high demand for suitable accommodation in the surrounding area has resulted in limited availability at high prices. Please refer to BNP Paribas' accompanying letter for further detail of the exercise undertaken, including the (limited) results returned in the significantly expanded search area.
- 5.58 The exercise has concluded that there are no available sites within the identified search area that could deliver the housing requirement generated by Policy DP1 from the proposed development at 9-13 Grape Street.
- 5.59 It can therefore be concluded that it is not viable or reasonable to provide housing off-site either.
- 5.60 As such, it is considered that in this instance, a payment in lieu accords with policy.
- (iii) Assessment: payment in lieu of affordable housing provision
- 5.61 The supporting text to Policy DP1 states that payments-in-lieu will only be accepted under exceptional circumstances, where provision cannot reasonably or practically be achieved on site and the applicant demonstrates that no alternative site is available in the area.
- 5.62 Set out above is a reasoned justification as to why on site residential provision cannot be accommodated, whilst the off-site housing site search exercise that has been undertaken demonstrates that there are no sites available that can reasonably be expected to provide a policy-compliant amount of residential floorspace.
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- 5.63 Accordingly, a payment in lieu of physical provision is considered appropriate in this particular instance.
- 5.64 Camden Planning Guidance 8: Planning Obligations provides guidance on calculating the payment in lieu. Where the payment is in lieu of housing under Development Policy DP1, calculations of the payment will proceed as follows:
- the additional floorspace proposed will be multiplied by the 50% target for on-site housing to produce a floorspace target (GEA);
  - the on-site housing floorspace target is less than 1,000sq m (GEA);
  - consequently no contribution to affordable housing would be sought under policy DP3;
  - the target for on-site housing floorspace will be multiplied by the payment per square metre figure of £700
- 5.65 Therefore, based on a requirement to provide 102sqm of on-site housing floorspace, the required payment in lieu would be £71,400, which could be invested in affordable housing or other forms of housing by the Council.

## Design

- 5.66 When viewed in the context of the street relative to the adjacent properties forming the terrace on the east side of Grape Street, nos.9-13 are distinguished by sitting lower than their neighbours immediately to the north, and the end of the terrace to the south.
- 5.67 The street is characterised by a strong parapet line and shoulder height of the terrace, sitting four storeys (G+3) in height, with dominant cornices separating each floor level. There is a distinct pattern and rhythm to the fenestration and to the solid-to-void ratio of the façade, with the ground floor level reading as a separate element to the upper floors above.



*Front (west) elevation of 9-13 Grape Street*

5.68 Regard has been had to the planning history of the site in formulating the design response, specifically the March 2015 consent and the refusal of permission that preceded this consent.

(i) Principle of additional storey

5.69 An opportunity exists to provide additional office accommodation at 4th floor level, replacing the existing pitched roof.

5.70 It is proposed to construct a single storey roof extension across the properties. The existing ridgeline of no.9 forms the maximum height of the new roof.

5.71 The new roof will continue the pattern of projecting party walls present on the lower floors of the building, and replicate the pattern of windows in the new roof slope. The chimney between nos.9 and 11 will be preserved.

5.72 The building's hierarchy is retained through the provision of this modest roof extension, set back from the dominant parapet line of the existing building.

5.73 The presence the building will be retained when viewed at street level, and when viewed from longer-distance views from the north and south along Grape Street. The height, bulk, massing, shoulder height, and proportions will continue to be read as

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existing, exhibiting strong cornices and parapet lines, and strong projecting party wall details.

- 5.74 A roof extension to the building was approved in March 2015, and the officer's report made similar observations:

*"In light of the Inspectors assessment in 2001 and Council's decision in 2013, this proposal would retain a similar roof pitch, position and form along the front façade to the existing. As a result, public and private views from Grape Street, High Holborn and Shaftesbury Avenue would see no evident change. The proposal would therefore overcome the previous concerns and would not fill an area seen in views along Grape Street as open sky, but rather retain the existing relationship and distances seen between the proposal site and the upper floor levels of King Edward Mansions.*

*The inset rooflights to the front elevation and slated roof pitch are appropriate in terms of materials and design, similar in architectural style and proportions with the façade below. The rooflights would align with the form and fenestration pattern of the building, in a simple and suitable approach of limited visual impact."*

- 5.75 For the avoidance of doubt, the roof extension proposed as part of this current application adopts the height, bulk, massing, and profile of the approved roof extension from March 2015.
- 5.76 This extant consent is a material consideration in the context of this application, proposing a roof that adopts the same dimensions to that which has previously been approved.
- 5.77 Please refer to the Design & Access Statement prepared by Robin Partington & Partners for full details of the development proposals, and a detailed discussion of the design rationale.

(ii) Façade alterations

- 5.78 The existing façade – which contributes positively to the character of the street and the wider conservation area – will be retained. The pattern and rhythm of the

fenestration and the detailing of the façade will be retained, including retaining the existing solid-to-void ratio that characterises the properties.

- 5.79 At ground floor level a new entrance to the building will be created, providing a single point of entry to the new office building for its users.
- 5.80 The new office use will provide an active use at ground floor level, creating vibrancy and activity on this section of Grape Street. As set out above, the building is currently vacant and has not contributed to the character and vitality of Grape Street for 2 years.
- 5.81 This active frontage – albeit one which doesn't serve visiting members of the public – is in accordance with the wider objectives of Camden's Core Strategy Policy CS17 which states that buildings should be:

*"Visually interesting at street level, with entrances and windows used to create active frontages, which allow overlooking of public areas, provide a sense of vitality and contribute to making Camden a safer place"*

- 5.82 This is in keeping with the existing character and appearance of Grape Street, which features examples of ground floor commercial premises similar to that being promoted by this scheme.



*Commercial frontages on Grape Street*

- 5.83 A separate, secondary entrance will be created in the southernmost bay of the site, serving the bicycle store and temporary refuse area. Further details of these facilities are discussed below.





*Proposed front elevation, showing the retained façade and new entrances within the southern bay*

- 5.84 At the rear, a new window is proposed at 4th floor level, within the new roof. At the pre-application stage the Council queried the implications of providing windows in this location on the development potential of the site at the rear of 9-13 Grape Street.
- 5.85 The photographs on the next page show existing windows overlooking this area at the rear of these properties – windows that are not part of the application site – which create a restricted developable envelope in respect of sunlight & daylight impact, sense of enclosure, privacy and overlooking, and Rights of Light.



*Existing windows in adjacent buildings facing north (above left) and south (above right)*

- 5.86 Following analysis by GIA, we can confirm that the creation of new windows at 4th floor level within the new roof extension will not lead to additional impact on any future development potential at the rear of the properties forming the east side of Grape Street, given these existing constraints.

### **Amenity**

- 5.87 The amenity considerations discussed below should be assessed in the context of the proposed development – the change of use from one commercial use to another – and the extant consent at the site for an additional storey.

(i) Sunlight & daylight, sense of enclosure

- 5.88 There will be no adverse sunlight & daylight impact created as a result of the modest additional storey.
- 5.89 The proposed roof form adopts the broad principles and proportions established by the March 2015 consent, which confirmed the additional massing at this level would not give rise to any adverse impact.
- 5.90 A full daylight & sunlight assessment accompanies this application, which concludes:

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- 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;
  - The results show that for all of the surrounding properties, the change in ADF value is negligible;
  - All of the properties surrounding the site will retain sunlight levels that comply with the BRE guidelines;
  - The proposed development will have no material impact to the daylight and sunlight levels to the surrounding residential accommodation by reference to the BRE guidelines; and
  - In relation to the overshadowing assessment, we consider that the proposal will not cause any noticeable additional overshadowing to the rest of the surrounding area.

5.91 Accordingly, the additional storey will not give rise to any adverse impact in respect of sunlight, daylight, and overshadowing, and the proposals are in accordance with Policy DP26.

(ii) Internal amenity

5.92 With regards to internal amenity, the open plan nature of the proposed office accommodation will receive natural daylight from the existing windows on the front (west) elevation. The existing 'glazed brick' lightwells in the pavement will provide natural daylight to the lower ground floor level accommodation.

(iii) Privacy & overlooking

5.93 The proposed development retains the existing front façade – including window openings – and comprises a change of use from one commercial use to another. Contrasted against the March 2015 consent for a change of use to residential, the current office proposal is considered to represent an improvement in amenity terms due to the nature of the use and its hours of operation.

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- 5.94 Existing site constraints notwithstanding, the accompanying Design & Access Statement contains elevations which show the location of the windows of the buildings opposite and their relationship with the windows in the elevation of 9-13 Grape Street, demonstrating the angled profile and lack of windows directly facing one another.
- 5.95 Fritted glass will be applied to all windows – as set out within Design & Access Statement – reducing the potential for overlooking between the buildings on opposite sides of the street.

(iv) Noise

- 5.96 Turning to noise, an office use is entirely compatible with other town centre uses within the Central Activities Zone, including residential. It would not be expected that an office use would generate any exceptional or unusual activity, noise or disturbance, and the hours of operation are expected to be standard for a commercial office building of this size in this location.
- 5.97 It should also be noted that the proposal represents replacing one commercial use with another, albeit a use which ceased approximately 3 years ago. It is not introducing a new commercial use into a predominantly residential area.
- 5.98 An Environmental Noise Survey Report prepared by Sandy Brown is submitted as part of this application which establishes parameters within which the proposed plant can - and will - operate in order to comply with policy, and which provides guidance for the required acoustic performance of the façade and ventilation strategy. In summary:
- All plant must be designed such that the cumulative noise level at 1m from the worst affected windows of the nearby noise sensitive premises does not exceed 52 dB during the daytime, and 45 dB during the night;
  - The sound insulation performances for both the front and rear facades can be achieved using standard double glazing;
  - Acoustically attenuated passive ventilation (e.g. trickle vents) or full mechanical ventilation could be employed as a ventilation strategy; and

- In respect of the London Underground Central Line, tactile vibration and re-radiated noise levels are below the limiting criteria set out by the relevant guidance, and are unlikely to result in adverse comment.

5.99 Accordingly, the proposal complies with Policy DP26 and will not give rise to any adverse impact in respect of noise and disturbance.

### **Sustainability**

5.100 The nature of the proposed development is sustainable in its own right, converting and adapting an existing building for use by a modern office occupier.

5.101 Accompanying this application is an Energy Statement, Sustainability Statement, and BREEAM pre-assessment report prepared by Scotch & Partners. It sets out how the development can achieve a BREEAM rating of 'excellent' in accordance with policy, and sets out the proposed sustainability measures in accordance with the Mayor's 'Be Lean', 'Be Clean', and 'Be Green' energy hierarchy. In summary:

- A preliminary assessment has been carried out by a licensed BREEAM Assessor and Accredited Professional informed through consultation with the project team;
- The anticipated target score for the development is 75.73%, equating to BREEAM 'Excellent' rating; and
- With regards to reducing CO2 emissions, as a result of the 'Be Lean', 'Be Clean' and 'Be Green' measures proposed by the energy strategy, an overall CO2 emissions reduction of 46% has been estimated compared to an existing notional building.

5.102 Accordingly, the proposed development is in accordance with Policy DP22(e) and Camden Planning Guidance 3.

### **Transport and servicing**

5.103 The site benefits from excellent public transport links, enjoying the highest PTAL rating. Employees will arrive via public transport, on foot, or via bicycle. The proposed development does not propose any car parking on site.

- 5.104 A bicycle store is located at ground floor level accessed directly from Grape Street. It accommodates 16 bicycle parking spaces, which exceeds the 2015 FALP minimum standards of 13 long-stay (staff) and 2 short-stay (visitor) spaces for a development of this size (1,125sqm B1 floorspace).
- 5.105 Refuse and recycling will be stored in a dedicated store at lower ground floor level, and brought up to ground floor level by the building's concierge at collection times and temporarily stored in a dedicated space within the bicycle store, accessed directly from the street.

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## 6. Conclusions

- 6.1 9-13 Grape Street has been vacant for approximately 3 years, and planning policy at all levels – and enshrined in the NPPF as a presumption in favour of sustainable development – seeks to make the most efficient use of land and buildings, bringing vacant or underused sites back into use.
- 6.2 The principle of redevelopment is also supported by the London Plan which seeks to support and manage growth across London.
- 6.3 An opportunity exists to provide new, modern office accommodation which caters for a specific identified need.
- 6.4 The proposal will contribute to the vitality, function and success of this part of Camden, within the Central Activities Zone, and contribute to London's role as a major global city, creating new jobs in the Borough.
- 6.5 Additional floorspace will be provided within a new 4th floor level, replacing the existing pitched roof but adopting the parameters established by the March 2015 consent on the same site.
- 6.6 The presence the building will be retained when viewed at street level, and when viewed from longer-distance views from the north and south along Grape Street. The height, bulk, massing, shoulder height, and proportions will continue to the read as existing, exhibiting strong cornices and parapet lines, and strong projecting party wall details.
- 6.7 The ground floor of the building will be in keeping with the existing character and appearance of Grape Street, which features examples of ground floor commercial premises similar to that being promoted by this scheme.
- 6.8 The proposals are not considered to give rise to any adverse amenity impacts.
- 6.9 The development will achieve a BREEAM 'excellent' rating.
- 6.10 Bicycle parking and dedicated space for refuse and recycling has been accommodated within the proposed scheme.

6.11 For all of the above reasons, the proposed change of use of 9-13 Grape Street to provide modern office accommodation is in accordance with all levels of planning policy, and it is considered that planning permission should be granted accordingly.