

Planning Statement

11-12 Grenville Street, London WC1N 1LZ

August 2016



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Executive Summary

This Planning Statement has been prepared by JLL Planning and Development on behalf of Calabar Properties Ltd ('The applicant'), which owns the freehold interest of 11-12 Grenville Street.

11-12 Grenville Street is a 4 storey building plus basement, located on the west side of Grenville Street within the London Borough of Camden ('Camden').

The upper storeys of the building used to be occupied as offices but have been vacant for over fifteen years. The ground floor of the building accommodates two separate retail units: a Class A3 unit which is currently operated as a café and a small Class A1 unit, formerly a newsagent, which has also been vacant since for over fifteen years and is considered too small to generate any market interest.

The building is currently in poor condition and has been occupied by squatters on 3 different occasions, making the property unusable and unmarketable for periods of time. The upper storeys are in need of significant repair and structural works.

The proposed development will involve the conversion of part of the ground floor and the upper storeys from office to residential use, which will ensure that building is brought back into use after a long period of vacancy and disrepair.

The existing retail units will be consolidated, creating a larger and commercially viable unit which will not result in a loss of retail floor area, and will continue serving the local community.

The rear garage will be converted to a new self-contained mews house.

In addition to the above, a number of improvements are proposed to the appearance of 11-12 Grenville Street. These include minor works to the main elevation, a new mansard roof extension to accommodate a residential unit and a rear infill extension. These proposals have been designed to respect and enhance the character and appearance of the building and the conservation area.

There is strong planning policy support for all of the uses proposed. The design is of the highest quality and has been subject to pre-application discussions with the Council. It is our view that the proposals accord with the relevant national, regional and local policies and that the planning application should be considered favourably.

1 Introduction

- 1.1 This Planning Statement has been prepared on behalf of the applicant by JLL Planning and Development. It concerns the site at 11-12 Grenville Street, WC1 which contains a 5 storey office and retail building.
- 1.2 This Planning Statement provides an assessment of the proposals against the provisions of the statutory Development Plan covering the site, the National Planning Policy Framework (NPPF) and other material planning considerations.
- 1.3 The Statement is set out as follows:
 - Section 2 provides details on the site, its surroundings and planning history
 - Section 3 outlines the proposals and pre-application consultation
 - Section 4 details the relevant planning policy (including local, regional and national guidance)
 - Section 5 sets out the justification for planning permission
 - Section 6 states the conclusions

Description of development

- 1.4 Planning permission is sought for:

“Conversion of part of the ground floor and upper storeys from office to residential use; consolidation of the existing Class A1 and A3 units into a new commercial unit for Class A1 and Class A3 use; conversion of the garage to the rear of 11 Grenville Street into a mews style self-contained house; and erection of a mansard roof extension”.

- 1.5 Specifically, the proposal includes the following:
 1. Restoration and cleaning of the Grenville Street elevation;
 2. Consolidation of the existing small Class A1 and A3 units into a new commercial unit for Class A1 or Class A3 use;
 3. Change of use of part of the ground floor and upper storeys from office to residential use;
 4. Rear extension to the upper floors to facilitate the change of use;
 5. New sensitively designed mansard roof extension to 11 and 12 Grenville Street; and
 6. Replacement of the existing garage building to the rear of 11 Grenville Street with a new mews style self-contained residential unit.

Format of submission

- Planning application fee of £2,310;
- Planning application form and ownership certificates;
- CIL Form (JLL);
- Planning Statement (JLL);

- Site Location Plan (Garnett + Partners LLP);
- Application Drawings (Garnett + Partners LLP) and Appendix 1 provides a full list;
- Design and Access Statement (Garnett + Partners LLP) including recycling and refuse strategy and cycle parking arrangements;
- Viability Report (JLL);
- Marketability Report (Hurford Salvi Carr);
- Heritage Statement (Kevin Murphy Heritage);
- Energy Statement (WPP) including BREEAM Pre-Assessment;
- Sustainability Statement (WPP);
- Daylight and Sunlight Assessment (Point2 Surveyors);
- Basement Construction Statement (Taylor Whally Spyra);
- Construction Management Plan (WSP); and
- Acoustic Report (WPP).

2 The site and its surroundings

The site

- 2.1 The application site sits on a 176 sqm plot, situated within the administrative boundary of Camden.
- 2.2 11-12 Grenville Street is a four storey unlisted building plus basement, originally forming part of a Georgian terrace of town houses.
- 2.3 The site comprises a late 19th century combination of two buildings which are unremarkable in architectural terms. The site has been one building internally since the 1890s and its layout has been heavily altered. The ground floor of the properties was altered at some point during the 20th century, likely after WW1.
- 2.4 The upper floors of the properties are in office use and they have been vacant for over 15 years. They are in need of structural repairs and are no longer fit for occupation. In the last few years, the upper floors were occupied by squatters on three separate occasions, resulting in significant disrepair of the premises.
- 2.5 At ground floor level, the building accommodates a Class A3 unit which is currently operated as a café and a small Class A1 unit, formerly a newsagent, which has also been vacant for over 15 years.
- 2.6 The ground floor is cut through by a driveway into Colonnade, a small mews that connects Grenville Street to Herebrand Street.
- 2.7 To the rear of the café, the site includes a garage which is accessed from Colonnade.
- 2.8 The site benefits from excellent public transport accessibility, with Public Transport Accessibility Level (PTAL) score of 6a. It is within 3 min (0.1 mile) walk of Russell Square Underground Station (Piccadilly Line) and is served by numerous bus routes (Nos. 59, 68, 91, 168, 188, N91 and X68).

The surrounding area

- 2.9 11-12 Grenville Street is located within the Bloomsbury area of Camden, which has a mixed use character. This includes residential, student accommodation at International House (located opposite the application site across Grenville Street), commercial uses, hotels, retail including The Brunswick Centre (located on Bernard Street), nearby hospitals such as Great Ormond Street Hospital (located west of the application site along Bernard Street) and cultural amenities such as The Foundling Museum fronting Brunswick Square Gardens.
- 2.10 Specifically, the site forms part of a largely residential urban block which comprises the Colonnade and Herbrand Street.
- 2.11 Building heights along Grenville Street range between 4-6 storeys and vary in age and quality. There is no common vernacular.
- 2.12 There are several listed buildings within the application site's vicinity, including The Brunswick Centre (Grade II), Nos. 11-24 and 27 Bernard Street (Grade II) and Nos. 75-82 Guildford Street (Grade II).
- 2.13 The west side of Grenville Street predominantly consists of buildings of Georgian character. The neighbouring building immediately to the east of the site is Downing Court, which sits on the corner of Grenville Street and Bernard Street. Downing Court breaks the terrace in both style and height by being a storey and a half taller.
- 2.14 The east side of Grenville Street is occupied by International House and is typical of mid-20th century design with a monolithic elevation.

2.15 Further description of the building and of the local context is provided in the Design and Access Statement and Heritage Statement.

3 Planning history

- 3.1 Table 3.1 below outlines the planning history of the site.
- 3.2 Planning application ref. 2009/4992/P, submitted in October 2009 for the demolition of the existing building and the erection of a five storey residential development, was withdrawn following advice from Camden that the demolition would not be supported.
- 3.3 A second planning application (ref. 2013/0833/P) was submitted in March 2013 for the refurbishment and conversion of the building to residential use, including a rear extension and a new mansard at roof level. The application was refused for a number of reasons including land use, design and massing.

Table 3.1 Site Planning History *Source: Camden's online planning register*

Application Number	Proposal	Decision	Decision Date
2013/0833/P	Change of use of entire building from office (Class B1), restaurant and café (Class A3) and retail (Class A1) into residential (Class C3), erection of mansard roof extension, alterations to the front elevation, replacement of existing single storey rear extension, erection of four storey infill rear extension.	Refused	24-10-2013
2009/4993/C	Demolition of existing building comprising basement, ground and three storeys above (Class A1, A3 and B1a).	Withdrawn	n/a
2009/4992/P	Erection of basement and five storey building comprising 9 flats [3x one-bedroom flats, 4x two-bedroom flats and 2x three-bedroom flats] (Class C3) with associated works to the Colonnade.	Withdrawn	n/a
2005/3678/T	(TPO Ref: C16) REAR GARDEN: 1 x London Plane- Remove & treat stump	Approve Works	31-08-2005
9500559	Installation of sunblind as shown on 1 x unnumbered drawing	Granted	27-03-1995
9401111	Variation of additional condition 01 attached to planning permission dated 8 th July 1994 (Reg. No. PL/9400452) for use of the ground floor as a snack bar to change the hour of opening from 8am to 7am.	Granted	21-07-1994
9400452	Change of use from retail (Class A1 in the Town and Country Planning (Use Classes) Order 1987) to a snack bar (Class A3 in the 1987 Order) and erection of extract duct on rear elevation as shown on drawing numbers RE RG1 & RG2 and 1 (A4 size) unnumbered drawing titled 'Extractor Outlet' revised on 21 June 1994.	Granted	05-04-1994

Application Number	Proposal	Decision	Decision Date
8501954	Change of use of basement and ground floor from retail to doctors surgery.	Granted	1985
34299	Use of the ground floor and basement as a shop.	Granted	07-06-1982

The 2013 application

- 3.4 Application ref. 2013/0833/P was submitted in 2013 for the change of use of the entire building from office (Class B1), restaurant and café (Class A3) and retail (Class A1) into residential (Class C3), along with the erection of mansard roof extension and erection of four storey infill rear extension.
- 3.5 The proposed design and change of use were not considered to be fully policy compliant and the application was refused. However, the Officer's Delegated Report confirmed the following:
- The introduction of residential use in the building is welcomed.
 - The principle of the replacement of the existing rear extension is acceptable.
 - Given the site constraints, it is acceptable that the full compliance of all Lifetime Homes criteria cannot be achieved.
 - The proposed extensions would have no adverse impact on the amenity of neighbouring residential occupiers.
 - The principle of a car free development is acceptable.
- 3.6 The planning application was refused for the following reasons:
- The proposed development would result in the loss of employment floorspace and was not sufficiently justified by a marketability report.
 - Absence of a robust marketing justification with regards to the loss of A1 and A3 units.
 - The proposed mix of units was not policy compliant.
 - The proposed mansard roof extension was considered detrimental to the character and appearance of the building and the local area.
 - The proposed infill rear extension would erode from the character of the rear elevation of the host building.
 - The design of the proposed single storey rear extension was not in keeping with the character and appearance of the building and the conservation area.
 - Absence of legal agreement for:
 - Car-free residential units;
 - Construction Management Plan;

- Highway works contribution (to ensure reinstatement and repaving of the footway adjacent to the site);
- Public open space contributions;
- Post-construction BREEAM assessment; and
- Contributions towards educational facilities.

3.7 The new proposal seeks to improve on these issues and is detailed in the next section.

4 The proposal and previous application

4.1 The proposed scheme entails the following:

1. Restoration and cleaning of the Grenville Street elevation;
2. The consolidation of the existing small Class A1 and A3 units into a new commercial unit for Class A1 or Class A3 use;
3. Change of use of part of ground floor and upper storeys from office to residential use;
4. Rear extension to the upper floors to facilitate the change of use;
5. New sensitively designed mansard roof extension to 11 and 12 Grenville Street; and
6. Replacement of the existing garage building to the rear of 11 Grenville Street with a new mews style self-contained residential unit.

Land use mix

- 4.2 The proposal involves the change of use of part of the ground floor and of the upper floors from office to residential floorspace. The upper floors have been vacant for over 15 years and repeatedly subject to vandalism by squatters. Furthermore, 11-12 Grenville Street is not located in a traditional office location.
- 4.3 As part of the scheme, a larger commercial unit will be accommodated at ground and basement levels, whilst the small A1 unit at ground floor will be converted to residential use.
- 4.4 Thus the proposed mix of uses includes :
- Class A1/A3 unit (ground and basement) : 122 sqm GIA; and
 - 6 residential units, Class C3 (ground to fifth floor level and self-contained mews).

Proposed retail unit

- 4.5 The Class A3 unit will be extended to incorporate the floorspace of the Class A1 unit, forming a new commercial unit, fit for Class A1 and Class A3 use.
- 4.6 The existing Class A1 unit has also been vacant for over 15 years and our letting agents have confirmed that its floorspace is too small (15sqm) to generate any market interest. Evidence of this is provided in the Marketability Report.
- 4.7 By merging the two existing units, only 6sqm of retail floorspace will be lost which is considered negligible.
- 4.8 The resulting unit will measure 122 sqm, just above the Council's definition of 'small shop' (100sqm) and will continue supporting small independent businesses within the Bloomsbury area.
- 4.9 It is proposed that the unit could be used for either Class A1 or Class A3 uses, to maximise opportunities to attract new commercial operators and contribute to the vitality of Grenville Street.

Proposed residential units

- 4.10 A total of 6 new residential units will be form part of the development:
- 3no. 1 bed units; and
 - 3no. 2 bed units.
- 4.11 The residential accommodation proposed on the upper floors will comprise 3 x 1 bedroom apartments on the first, second and fourth floor, and 1 x 2 bedroom apartment on the third floor. These will all be accessible from a communal entrance next to the proposed retail unit.
- 4.12 Unit 2, which is configured over three floors, will consist of 2 bedrooms and will have a separate entrance (the current vacant A1 unit).
- 4.13 The mews building will accommodate a further 2 bedroom unit.

Lifetime Homes compliance and wheelchair accessibility

- 4.14 The proposal seeks to meet all the requirements of Lifetime Homes which are available as part to this conversion. However due to the nature of the existing building, not all criteria can be achieved and it will not be possible to provide disabled access to all floors due to the retained access arrangements.

Internal spaces

- 4.15 The table below illustrates the number of bedrooms and proposed internal area of each residential unit, compared to Camden’s internal standards.

Table 4.1: Comparison between internal spaces and LBR requirements

Unit Number	Number of bedrooms	Camden’s required net internal floor area	Proposed space
1	2	75 sqm	96 sqm
2	2	75 sqm	93 sqm
3	1	48 sqm	51 sqm
4	1	48 sqm	52 sqm
5	2	75 sqm	93 sqm
6	1	48 sqm	50 sqm

Proposed tenure

- 4.16 As the proposal is for six new residential units only, no affordable housing is proposed in line with local and national policies.

Design

Improvements to front elevation

- 4.17 The front elevation will be sympathetically refurbished and will preserve the original architectural style of the building.
- 4.18 Structural repairs will be made and the portico surrounding the entrance to the Colonnade will be repaired. The existing brickwork will be cleaned, repaired and repointed. The current sash windows, which are not original, will be replaced with double glazed painted timber sliding sash windows, in line with the historic character of the building.
- 4.19 The new commercial unit will have a traditional timber shopfront which will significantly improve the overall design of the elevation.
- 4.20 The existing Class A1 unit will be converted into the residential entrance to the new 2 bed maisonette unit, whilst the entrance to no.11 will become the residential entrance to the upper residential units. As a consequence, the existing A1 shopfront and entrance door will be removed, none of them is original or of historic value.
- 4.21 The residential entrances to the maisonette and to the upper residential floors have been designed to high standard and to complement the local townscape.

Improvements to rear elevation

- 4.22 The building line to the rear has been extended over Colonnade, whilst preserving the existing set-back which outlines the former division between 11 and 12 Grenville Street. The proposed infill will provide additional residential accommodation, facilitating the conversion of the upper storeys to sufficiently sized apartments.
- 4.23 In response to pre-application comments, the extent of the proposed rear extension has been reduced from 3 metres to 1.9 metres during the design evolution. The resulting rear elevation remains subordinate to the front elevation, thus maintaining the original character of the building and protecting views along Colonnade.
- 4.24 New openings are proposed, of a style which is in keeping with the character of surrounding properties and it is less formal than that of the front elevation windows.
- 4.25 The rear and side of 11 Grenville Street will be refurbished, clearing the pipework that currently clutters the elevation. The existing brickwork will be cleaned, repaired and repointed.
- 4.26 The profile of the gable wall and mansard roof details will be re-provided, as these were indicated as "*interesting features*" in the 2013 Officer's Delegated Report.

Mansard Extension

- 4.27 The proposed mansard extension will be traditional in design and detail. Front and rear pitches will be covered in natural slate to match the adjacent properties. The top pitches will be leaded to reduce the impact of the extension on the building line.
- 4.28 Party walls will be raised in reclaimed stock brickwork to match the existing with stone parapet copings. Specifically, the party wall between nos. 11 and 12 will be expressed on the roof to distinguish the traditional plot boundary between the buildings.

- 4.29 New leaded dormer windows are proposed in keeping with the mansard roof and designed to reflect the fenestration of the main building. Chimney stacks and pots are proposed to the party walls to enhance the character of the roof development.

Mews house

- 4.30 The existing garage building adjoining 11 Grenville Street has no design merit. It is proposed to demolish it and to replace it with a new mews house, of simple architectural style which reflects the traditional mews houses on the opposite side of Colonnade.
- 4.31 The mews house will follow the same footprint of the existing rear extension and its height is in keeping with that of the other properties along Colonnade.
- 4.32 To promote sustainable development and biodiversity, a 'green roof' is proposed.
- 4.33 The principle of the replacement of the garage was considered acceptable in the 2013 scheme.

Relationship with neighbouring buildings

- 4.34 The proposed rear infill extension does not project beyond the existing rear wall. Therefore, there will be no adverse impact on the amenity of neighbouring residential occupiers in terms of daylight and sunlight, outlook or privacy.
- 4.35 Equally, the proposed mews development will respect local amenity as demonstrated in the Daylight and Sunlight Report. A Construction Management Plan (CMP) has also been submitted which demonstrates that the proposed works will be managed so not to have any detrimental impacts on local residents.

Transport considerations

- 4.36 In light of the excellent public transport accessibility of the site, it is proposed to deliver a car free development.
- 4.37 A total of 5 cycle spaces will be provided within the bicycle store to the rear of the building, to serve the 4 apartments accessible from 11 Grenville Street and the mews unit.
- 4.38 The apartment accessible from 12 Grenville Street is provided with an internal bicycle store space.

Refuse Management

- 4.39 Residential refuse and recycling storage have been located in the historic garage unit to the rear of no.12 Grenville Street, beside the bicycle storage.

Sustainability

- 4.40 A BREEAM Domestic Refurbishment Pre-Assessment has been submitted which demonstrates that the proposals will target a BREEAM score of 'Very Good'.
- 4.41 The Sustainability and Energy Statements demonstrate how the proposed design complies with Camden policy requirements.

Basement works

4.42 As part of the proposals, basement excavation is proposed underneath the mews building and the proposed retail unit, to optimise the potential of the site. This is explained and justified in the submitted Basement Impact Assessment (BIA).

Comparison between the proposal and the 2013 planning application

4.43 The table overleaf explains how the proposal has addressed the reasons for refusal of the 2013 planning application.

Table 4.2: Comparison between the current scheme and the 2013 planning application

	2013 Application	Current Application
1	The loss of employment floorspace was not sufficiently justified by a marketability report.	A Marketability Report has been prepared to demonstrate that despite having marketed the premises, no interest was generated by potential office occupiers.
2	The loss of A1 and A3 units was not supported by a robust marketing justification.	The existing A3 unit will be retained and its floorspace increased to incorporate the area of A1 unit. It is proposed that the new unit could be used for A1 or A3 to maximise the chances of successful marketing. The A1 unit is very small and has been vacant over 15 years.
3	The proposed mix of units was not policy compliant.	The proposed mix of units has been revised and is now compliant with policy DP5.
4	The proposed infill rear extension was considered detrimental to the character and appearance of the building and the local area.	The proposed infill rear extension has been reduced to maintain the historic demarcation between 11 and 12 Grenville Street, and includes openings that take cues from the character of surrounding properties. The rear extension will retain a subordinate relationship to the front elevation and preserve local views.
5	The design of the proposed single storey rear extension was not in keeping with the character and appearance of the building and conservation area.	The design of the proposed mews house is of simple architectural style, marked improving the appearance of the rear section of the application site whilst being in keeping with the character of the mews houses along the Colonnade.
6	Absence of legal agreement for car-free housing.	The applicant will enter a legal agreement with the Council after submission of the application.
7	Absence of legal agreement to secure a Construction Management Plan.	A draft CMP has been submitted as part of the application package, and the applicant will enter a legal agreement with the Council after submission of the application to secure the final CMP.

	2013 Application	Current Application
8	Absence of legal agreement to secure highway works contribution (to ensure reinstatement and repaving of the footway adjacent to the site).	This is no longer applicable, further to the Camden's adoption of the Community Infrastructure Levy (CIL) charging schedule.
9	Absence of legal agreement to secure public open space contributions.	This is no longer applicable, further to the Camden's adoption of the CIL charging schedule.
10	Absence of a legal agreement to secure a Post-construction BREEAM Assessment.	The applicant will enter a legal agreement with the Council after submission of the application.
11	Absence of a legal agreement to secure contributions towards educational facilities.	This is no longer applicable, further to the Camden's adoption of the CIL charging schedule.

5 Pre-application consultation

- 5.1 A pre-application meeting was held on 7th November 2014 with Eimear Heavey of Camden.
- 5.2 The proposal involved the conversion of part of the ground floor and the upper storeys from office to residential use; the consolidation of the existing Class A1 and A3 units into a new commercial unit for Class A1 and Class A3 use; a mansard extension; and the erection of a new mews building to replace the existing garage to the rear of the site.
- 5.3 The Planning Officer confirmed that although there were clear benefits to the pre-application scheme, two main areas of concern remained:
- Loss of office floor space; and
 - Design:
 - Mansard - Camden would not support the principle of a mansard in this location.
 - Infill Extension - The proposed infill of 3m would need to be reduced.
 - Mews - The principle of a new mews building is supported, but a number of design alterations were requested.
- 5.4 The paragraphs below set out the detailed comments provided by the Officer, and how they have been addressed in this planning application.

Land use

Loss of office accommodation

- 5.5 The Officer requested further justification for the loss of the office floor space, to be strengthened by a viability report.
- A Viability Report has been submitted as part of this application, alongside a Marketability Report, which help to justify the loss of office floor space.

Loss of A1 and A3 units

- 5.6 The A3 unit is considered unit to add to the character, function and vibrancy of the area, and should be retained.
- 5.7 It was noted that although the A1 unit has been vacant for a significant number of years, its loss should be fully justified.
- The loss of the A1 unit is addressed within the Marketability Report, which confirms that there is no market interest for such a small unit.

Creation of residential units

- 5.8 Provided that the loss of office use is justified, the principle of residential accommodation is considered acceptable and in line with policies CS6 and DP2.

- **Mix**

5.9 Camden expects any housing scheme to meet the priorities outlined in the policy DP5 in the Dwelling Size Priority Table. The proposed mix (2x1 beds; 3x2 beds; and 1x3 bed) was considered appropriate.

- The proposed unit mix has now changed and remains in line with policy DP5.

- **Affordable Housing**

5.10 Policy DP3 expects all developments with a capacity to provide 10 units or more to make a contribution to affordable housing, therefore it was accepted that the proposed scheme is not large enough to require a contribution to affordable housing.

- **Lifetime Homes and Wheelchair Housing**

5.11 The Officer accepted that it was unlikely that the scheme could meet all Lifetime Home Standards, given the physical constraints of the building.

- **Standard of accommodation**

5.12 All flats will be considered against local and mayoral internal space standards. The officer noted that these standards were met in the pre-application scheme.

- The proposed units meet both local and mayoral internal space standards.

5.13 The officer advised that cycle parking and refuse/ recycling facilities should be located in two separate enclosures.

- The proposals include separate stores for cycle parking and refuse/recycling.

Design

Mansard extension

5.14 The proposed mansard extension was seen as an improvement of the 2013 application; however it was the Officer's opinion that Grenville Street benefits from a continuous roof form with uninterrupted views and therefore the proposed roof alteration would not be appropriate.

5.15 It was noted that there are similar schemes in the area that were refused but were successfully appealed. These appeals are detailed in Section 6 of this Statement.

- A Heritage Statement has been submitted which explains that not only Grenville Street does not present a continuous roof form with uninterrupted views, but also that the proposed mansard extension respects and enhances the character and appearance of the building and of the conservation area.

Rear extension

5.16 The proposed 3 m infill rear extension was considered excessive in the context of the Colonnade and of the historic character of the building.

- The proposed infill extension has been reduced to 1.9m.

Mews building

- 5.17 The change of use of the existing shed/garage to the rear of the building to a mews dwelling was considered acceptable.
- 5.18 In terms of design, it was suggested to follow a traditional approach preferably with no lightwell.
- The design of the mews building has been amended to a more traditional architectural style, with no lightwell.
- 5.19 Furthermore, excavation works would require the submission of a BIA in line with Camden's CPG4.
- A BIA accompanies this application.

Neighbouring Amenity

- 5.20 A Daylight and Sunlight Assessment was noted to be required as part of the any future planning application.
- A Daylight and Sunlight Assessment accompanies this application.

Transport and highways

- 5.21 No parking is proposed for the development, falling in line with policies DP18 and CS11 which expects all developments to be car free in the Central London area.
- 5.22 It was recommended that Camden standards be used in calculating the provision of cycle parking.
- A cycle parking area has been provided which meets Camden standards.
- 5.23 In order to manage movements of the construction vehicles to and from the site, a draft CMP would be required alongside the application.
- A draft CMP accompanies this application.

Sustainability

- 5.24 The officer confirmed that an Energy Statement should be submitted alongside the application to illustrate how carbon dioxide emissions will be reduced in line with the energy hierarchy. Additionally, a BREEAM Domestic Refurbishment Pre-assessment should be submitted.
- An Energy Statement, including BREEAM Pre-Assessment accompanies this application.

6 Appeal Precedents

- 6.1 This section outlines recent appeals allowed within Camden, relating to both the loss of employment floor space and mansard extensions.

Appeal related to the loss of employment floorspace

64 Charlotte Street (appeal ref: APP/X5210/A/13/2198369)

- 6.2 This application (ref: 2012/3537/P) was for the erection of extensions at first to third floor level, raising of cornice by 240mm, alterations to fenestration, shopfront and addition of railings and stairs to open frontage lightwells, all in connection with change of use from offices to residential on part of the ground floor and on the first to third floors (1x3 bed, 2x2 bed and 3x1 bed). It was refused on 22 April 2013.
- 6.3 The main issue was whether the proposed loss of employment floor space could be justified having regard to:
- Development plan policies concerning the retention of land and buildings suitable for continued business use; and
 - The effect of such loss on economic activity and employment opportunities within the Borough, particularly in respect of small and medium sized enterprises (SMEs).
- 6.4 The one year period of marketing that had been carried out for the site indicated that there was little commercial demand, including from SMEs for the office space on the site. Despite the marketing period being less than that required by local policies, the Inspector concluded that the loss of employment floor space would have a small impact upon economic activity or employment floor space in Camden, and thus the proposed change of use of the upper floors and rear ground floor to residential use could be justified.
- 6.5 The appeal was allowed on 29 November 2013.

Appeals related to a mansard extension

4-6 Charlotte Street (appeal ref: APP/X5210/A/13/2209985)

- 6.6 The application (ref: 2013/4500/P) proposed an extension of mansard roof on 4-6 Charlotte Street and extension to extraction duct on rear of the property. It was refused on 25 September 2013.
- 6.7 The main issues with this application were:
- Whether the proposals would preserve and enhance the character and appearance of the Charlotte Street Conservation Area; and
 - Whether in the absence of a legal agreement to restrict the eligibility of parking permits, the proposal would give rise to unacceptable levels of on street parking and congestion in the area.
- 6.8 The principle of a mansard roof was considered acceptable due to the irregular height of the properties which make up the terrace and consequently of their parapets, which break up the symmetry of the block and creates an inconsistent skyline. The differences in fenestration and the colour of the individual buildings within the terraces also emphasises their individuality, unlike many other terraces which exhibit considerable uniformity in design.
- 6.9 Additionally, the prevalence of mansard roofs, dormers and other roof alterations on properties in the locality would make the proposal appear unremarkable.

6.10 The appeal was subsequently allowed on 22 August 2014.

81 Charlotte Street and 6 Tottenham Mews (appeal ref: APP/X5210/A/10/2127649)

6.11 The application (ref: 2010/0069/P) involved the extension and alterations to 81 Charlotte Street including the erection of two storey rear extension; creation of terrace at rear second floor level and erection of a mansard roof extension with terrace to rear; demolition of portion of ground and first floor rear of 6 Tottenham Mews; erection of mansard roof extension; and change of use of the building from office to 2x two bedroom flats including alterations to front and rear elevations. The application was refused on 17 March 2010.

6.12 The main issues with this application were:

- The effect of the proposed development on the character and appearance of No 6 Tottenham Mews; and,
- Whether the development would preserve or enhance the character or appearance of the Charlotte Street Conservation Area.

6.13 The Council initially drew attention to their policy in respect of mansard roofs as set out in their Camden Planning Guidance published in December 2006. However, limited weight was given to this policy due to that fact it does not indicate the extent to which it was the subject of public consultation. Additionally, the principles set out in the guidance do not firmly militate against the form of extension in the context of Tottenham Mews as a whole.

6.14 Considering the factors above, the inspector did not share Camden's views on the matter of a mansard roof and states that proposed mansard set behind a low parapet wall and contained by the vertically extended upstands would make a positive contribution to the style and character of the building and would thus meet the general principles of the Guidance Document.

6.15 In terms of preserving or enhancing Charlotte Street Conservation Area, a number of properties on Tottenham Mews have mansard roof extensions and the alteration would fit into this pattern of development and add to the positive variety of architectural style on the street.

6.16 The appeal was subsequently allowed and planning permission was granted on the 6 October 2010.

Conclusions

Appeals related to loss of employment floorspace

6.17 The appeal precedent demonstrates that marketing evidence which is less than that required by policy can be used to justify the lack of demand for the business premises.

Appeals related to mansard roof extension

6.18 The appeals for mansard roof extensions clearly show that where the roof line of an area is varied in character, a mansard roof would not only be acceptable but would also make a positive contribution to a conservation area.

7 Relevant Planning Policy

- 7.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Other material considerations include items such as national planning policy guidance or statements, up to date research or site specific reasons.
- 7.2 This section examines the planning policy most relevant to the proposals. It looks at factors relevant to the creation of new residential development, the change of use, and conservation and design issues.
- 7.3 The statutory Development Plan related to the site comprises:
- The London Plan (LP, consolidated with alterations since 2011 (March 2016));
 - Camden's Core Strategy (CS, 2010); and
 - Camden's Development Policies Document (DPD, 2010).
- 7.4 Regard should also be had to the Government's National Planning Policy Framework (NPPF, 2012) and Camden's Bloomsbury Conservation Area Appraisal and Management Strategy (2011), Camden Planning Guidance (CPG) 1 Design (July 2015), CPG2 Housing (May 2016), CPG3 Sustainability (July 2015), CPG4 Basement and Lightwells (July 2015), CPG5 Town Centres, Retail and Employment (September 2013) and CPG6 Amenity (July 2015), CPG 7 Transport (July 2015) and CPG8 Planning Obligations (July 2015).
- 7.5 Although not adopted yet, Camden's Local Plan has reached the submission stage. Policies within the Local Plan can therefore be given limited consideration when determining planning applications.
- 7.6 The section below sets out policy designations relating to the site before reviewing adopted and emerging planning policy.

Site Designations

- 7.7 The site is designated on the Camden Policies Map, and falls within:
- Designated View (5A.2 Greenwich Park Wolfe statue to Tower Bridge – Right Lateral Assessment Area);
 - Central London Area; and
 - Bloomsbury Conservation Area.
- 7.8 The site is also indicated as a positive contributor in the Bloomsbury Conservation Area Appraisal and Management Strategy.

National Planning Guidance

National Planning Policy Framework (NPPF, March 2012)

- 7.9 The NPPF was published on 27 March 2012 by the Government and replaced Planning Policy Guidance and Planning Policy Statements. The NPPF is considered fundamental to Government reforms to promote economic growth and make the planning system more accessible.

7.10 The NPPF sets out the Government’s overarching economic, environmental and social planning policies in England and how these are expected to be applied. The NPPF does not change the statutory status of the Development Plan as the starting point for decision making, however it is a material consideration for local planning authorities in the determination of planning applications.

General Approach

7.11 At the heart of the planning system is a “*presumption in favour of sustainable development*”. In the context of decision-taking, this means (**paragraph 14**):

- *“Approving developments that accord with the development plan without delay; and*
- *Where the development plan is absent, silent or relevant policies are out of date, granting permission unless:*
 - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or*
 - *Specific policies in this Framework indicate development should be restricted.”*

7.12 **Paragraph 15** adds that “*policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay*”.

7.13 The NPPF sets out twelve core planning principles (**paragraph 17**) that underpin both plan-making and decision-taking. Within the context of the development proposed, the NPPF states that the planning system should:

- i. *“Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving places that the country needs;*
- ii. *Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- iii. *Encourage the reuse of existing resources, including conversion of existing buildings;*
- iv. *Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;*
- v. *Promote mixed-use development and encourage multiple benefits from the use of land in urban and rural area”.*

Employment

7.14 The Government seeks to build a strong and competitive economy through securing economic growth in order to create jobs and prosperity (**paragraph 18**).

7.15 The Government is committed to ensuring that the planning system does everything it can to support and promote sustainable growth (**paragraph 19**). **Paragraph 22** stipulates that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. It continues saying that planning applications for alternative uses should be treated on their merits, having regard to market signals and the need for different land uses.

Residential

- 7.16 With regard to housing, local planning authorities (LPAs) are expected to be able to identify a 5 year housing supply, plus a 5% buffer, as well as broad locations for housing growth for the next 15 years where possible (**paragraph 47**).
- 7.17 **Paragraph 49** requires housing applications to be considered in the context of the NPPF's overarching emphasis on the presumption in favour of sustainable development. LPAs are required to normally approve planning applications for changes to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate (**paragraph 51**).

Sustainable and Inclusive Design

- 7.18 The NPPF advises that planning decisions should not attempt to impose architectural styles or particular tastes and should not stifle innovation or originality, adding that great weight should be given to innovative design. Visual appearance is a significant factor but it is important that design considers connections between people and places.
- 7.19 **Paragraph 58** of the NPPF states that good design is fundamental to delivering sustainable development. Planning decisions should aim to ensure that developments achieve a high quality design response, that has regard to the establishment of a strong sense of place, functions well and adds to the overall quality of the area, responds to local character and history, creates safe and accessible environment, supports local facilities and transport networks and is visually attractive as a result of high quality architecture.

Transport and highways

- 7.20 **Paragraph 32** refers to transport, noting that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment.
- 7.21 The NPPF highlights that transport strategies need to be considered and should be balanced in favour of sustainable transport modes, for movement of goods or people.

Regional Planning Policy

London Plan (LP, 2016)

- 7.22 The LP is the overall strategic plan for London. It sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036 and forms part of the development plan for Greater London. London boroughs' local plans need to be in general conformity with the LP, and its policies guide decisions on planning applications by councils and the Mayor.

General Approach

- 7.23 **Policy 1.1** (Delivering the Strategic Vision and Objectives for London) sets the key aims for the LP as realising the Mayor's vision for London's sustainable development. Growth is supported across "*all parts of London to ensure it takes place within the current boundaries of Greater London*".
- 7.24 Within Inner London, **policy 2.7** (Inner London) states that the aim of the plan is to "*realise in potential of inner London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environments, neighbourhoods and public realm*".

Employment

- 7.25 **Policy 4.1** (Developing London's Economy) outlines the Mayor's emphasis to develop London's economy through ensuring the availability of sufficient and suitable workspaces, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises.

Retail

- 7.26 With regards to retail, LPAs should support convenience retail, particularly in District, Neighbourhood and more local centres, to secure a sustainable pattern of provision and strong lifetime neighbourhoods (**Policy 4.8**, Supporting a successful and diverse retail sector and related facilities and services).
- 7.27 Affordable shop units suitable for small and independent retailers should be provided or supported (**Policy 4.9**, Small shops).

Residential

- 7.28 **Policy 3.3** (Increasing Housing Supply) states that "*the Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford*". It seeks to ensure that the identified housing need is met, notably through the provision of at least an annual average of 42,000 net additional homes across London. Within Camden, the specific housing target is 8,892 units over the period 2015 to 2025, equating to 889 units per annum.
- 7.29 **Policy 3.4** (Optimising Housing Potential) states that housing potential is expected to be optimised, with a density matrix as a guideline for proposals. As the site falls within a 'central area' and has a high PTAL of 6a, the appropriate density of 650-1100 hr/ha applies.
- 7.30 Under **policy 3.5** (Quality and Design of Housing Developments) the Mayor specifies that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. Part B of the policy states that the design of all new housing developments should enhance the quality of local places, taking into account physical context, local character, density, tenure and land use mix.
- 7.31 **Policy 3.8** (Housing Choice) promotes a mix of housing sizes and type. All new housing should be built to the Lifetime Homes standard, and 10% should meet Building Regulations Requirement M4 (3) 'wheelchair user dwellings' (designed to be wheelchair accessible or adaptable). 90% of dwellings should meet Building Regulations Requirement M4 (2) 'accessible and adaptable dwellings'.
- 7.32 **Policies 3.11, 3.12 and 3.13** relate to affordable housing and seek to maximise affordable housing provision in qualifying developments. Affordable housing provision is required on sites which have capacity to provide 10 or more homes.

Sustainable and Inclusive Design

- 7.33 **Policy 3.6** (Children and Young People's Play and Informal Recreation Facilities) requires development proposals that include housing to make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.
- 7.34 **Policies 5.1, 5.2 and 5.3** seek to achieve an overall reduction in London's carbon dioxide emissions of 60% (below 1990 levels) by 2025 and promote the highest standards of sustainable design and construction in all developments.
- 7.35 **Policy 5.15** (Water Usage and Supplies) states that new residential development should be designed to ensure that mains water consumption would meet a target of 105 litres or less, per head, per day.

- 7.36 **Policy 7.2** (An Inclusive Environment) promotes world-class, high quality architecture and design and requires the highest standards of accessibility and inclusion.
- 7.37 **Policy 7.3** (Designing Out Crime) requires safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.
- 7.38 **Policy 7.4** (Local Character) requires development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings. The design of buildings, streets and open spaces should provide a high quality design response enhancing the character and function of an area.
- 7.39 Under **Policy 7.5** (Public Realm) planning applications will be assessed in terms of their contribution to the enhancement of the public realm.
- 7.40 **Policy 7.6** (Architecture) notes that the architecture should “*make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context*”.

Local planning policy

Camden Core Strategy (CS, November 2010)

- 7.41 The CS sets out the key elements of Camden’s vision and helps it define and plan for the future by covering the physical elements of location and land use, and addressing factors that make places ‘attractive, sustainable and successful’.

General Approach

- 7.42 **Policy CS1** (Distribution of growth) seeks to focus Camden’s growth in the most suitable locations and to manage it so that opportunities, benefits and sustainable development can be achieved. The policy seeks to preserve and enhance the features that make Camden an attractive place to live, work and visit.
- 7.43 The policy also promote the most efficient use of land and buildings through expecting provision of a mix of uses in suitable schemes, in particular the most accessible parts of the borough, including housing where possible.
- 7.44 **Policy CS5** (Managing the impact of growth and development) seeks to manage the impact of growth and development through the provision of uses, infrastructure and facilities that meet the needs of the local population, workers and visitors. Proposals are expected to be sustainable and of the highest quality, and to protect and enhancing the local environment and heritage.
- 7.45 **Policy CS9** (Achieving a successful Central London) supports Central London as a focus for Camden’s future growth in homes, offices, shops, hotels and other uses.

Employment

- 7.46 **Policy CS8** (Promoting a successful and inclusive Camden economy) seeks to secure a strong local economy. Part b) of the policy supports Camden’s industries through safeguarding existing employment sites and premises that meet the needs of modern industry and other employers.
- 7.47 Supporting **paragraph 8.8** outlines that Camden will consider proposals for other uses of older office premises if they involve the provision of permanent housing and community uses.

Retail

7.48 **Policy CS7** (Promoting Camden’s centres and shops) seeks to support the limited provision of small shops outside designated centres to meet local needs. Supporting **paragraph 7.17** emphasises the importance of small and independent shops and promotes their provision.

Residential

7.49 **Policy CS6** (Providing quality homes) aims to provide quality homes through maximising the supply of additional housing to meet or exceed Camden’s target of 5,950 homes from 2007-2017. Additionally, the policy emphasises that housing is a priority land use of Camden’s Local Development Framework.

7.50 Supporting **paragraph 6.39** outlines Camden’s dwelling size priorities:

Table 7.1 Dwelling Size Priorities Table *Source Camden CS*

	2 bedrooms	3 bedrooms	4 bedrooms or more
Market	Highest priority	Medium priority	Medium priority
Intermediate Affordable	Required	Required	Required (highest priority)
Social-rented	Medium priority	High priority	Highest priority

7.51 Supporting **paragraph 6.40** requires all dwellings developed to meet Lifetime Home standards.

7.52 Supporting **paragraph 6.41** expects 10% of homes to either be wheelchair accessible or easily adaptable, in accordance with the LP.

Design

7.53 **Policy CS14** (Promoting high quality place and conserving our heritage) requires development to be of the highest standard of design and to respect local context and character. The highest standards of access should be achieved in all buildings and places. Supporting **paragraph 14.4** outlines that development schemes should improve the quality of buildings, landscaping and the street environment

Heritage

7.54 **Policy CS14** (Promoting high quality place and conserving our heritage) seeks to preserve and enhance Camden’s rich and diverse heritage assets, including conservation areas. Views are additionally protected, especially the important views of St Paul’s Cathedral and the Palace of Westminster.

Sustainability

7.55 **Policy CS13** (Tackling climate change through promoting higher environmental standards) promotes high environmental standards. This includes efficient use of land and buildings, ensuring patterns of land use that minimise the need to travel by car, minimising carbon emissions from the redevelopment, construction and occupation of building and protecting existing local energy networks where possible.

Air Quality

7.56 **Policy CS16** (Improving Camden’s health and well-being) aims to improve Camden’s health and well-being, recognising the impact of poor air quality on health and implementing Camden’s Air Quality Action Plan.

Waste

- 7.57 **Policy CS18** (Dealing with our waste and encouraging recycling) seeks to reduce the amount of waste produced in the borough and increase recycling. Developments should include facilities for the storage and collection of waste and recycling.

Transport

- 7.58 **Policy CS11** (Promoting sustainable and efficient travel) encourages sustainable transport choice and the reduction of the environmental impact of travel.

Camden Development Policies Document (DPD, 2010)

- 7.59 The DPD contributes towards delivering Camden's Core Strategy vision, by setting out detailed planning policies to be used when determining planning applications.

General Approach

- 7.60 **Policy DP1** (Mixed use development) promotes mixed use developments where appropriate, including a contribution to the supply of housing.

Employment

- 7.61 **Policy DP13** (Employment premises and sites) seeks to retain land and businesses that are suitable for continued business use. Change to non-business uses will be resisted unless:

- a) *'it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use; and*
- b) *there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time'.*

- 7.62 Where a change of use has been justified, Camden will seek to maintain some business use on site, with retention of flexible space being a priority. When it is demonstrated that a site is not suitable for any business use other than B1(a) offices, Camden may allow a change to permanent residential uses or community uses.

- 7.63 Supporting **paragraph 13.3** outlines the various factors that Camden will take into account when assessing proposals that involve the loss of business. The Council will assess whether the site

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

- 7.64 In order to justify the change of uses to a non-business use, the applicant must demonstrate that there is no realistic prospect of demand to use the site for an employment use, which can be achieved through marketing evidence of at least two years.

Retail

7.65 **Policy DP10** (Helping and promoting small and independent shops) promotes the provision of small shop premises suitable for small and independent businesses by encouraging (among other points) the occupation of shops by independent businesses and the provision of affordable premises.

7.66 Additionally, Camden seeks to protect shops outside designated centres by only granting planning permission for development that involves a net loss of shop floorspace 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”.*

7.67 **Policy DP30** (Shopfronts) seeks to promote a high standard of design in new and altered shopfronts.

Residential

7.68 **Policy DP2** (Making full use of Camden’s capacity for housing) emphasises Camden’s aim to maximise the supply of additional homes. This includes expecting the minimum appropriate contribution to supply of housing on sites that are underused or vacant and resisting alternative development of sites considered particularly suitable for housing. Supporting **paragraph 2.9** states that Camden will expect the density of housing development to take account of the density matrix in the London Plan.

7.69 **Policy DP3** (Contributions to the supply of affordable housing) expects all developments with a capacity to provide 10 units or more to make a contribution to affordable housing.

7.70 **Policy DP5** (Homes of different sizes) states that when considering the mix of dwelling sizes, Camden will have regard to different dwelling size priorities for social rented, intermediate affordable and market homes, taking into account the character of the site and its physical and financial viability constraints.

7.71 Supporting **paragraph 5.5** emphasises the importance to focus provision around the aims in the priorities table below:

Table 7.2 Dwelling Size Priorities Table *Source: Camden DPD 2010*

Dwelling Size Priorities Table					
	1-bedroom (or studio)	2-bedrooms	3-bedrooms	4-bedrooms or more	Aim
Social rented	lower	medium	high	very high	50% large
Intermediate affordable	medium	high	high	high	10% large
Market	lower	very high	medium	medium	40% 2-bed

7.72 **Policy DP6** (Lifetime Homes and wheelchair housing) states that all housing development should meet lifetime home standards. 10% of homes developed should either meet wheelchair housing standards or be easily adapted to meet them.

Design

- 7.73 **Policy DP24** (Securing high quality design) aims to secure high quality design, requiring all developments (including alterations and extensions to existing buildings) to be of the highest standard of design.
- 7.74 Supporting **paragraph 24.12** emphasises the needs for developments to respect local character. New buildings, alterations and extensions should respect the character and appearance of the local area and neighbouring buildings and where townscape is uniform, attention should be paid to respond closely to the prevailing scale, form and proportions and materials.

Heritage

- 7.75 **Policy DP25** (Conserving Camden's heritage) states that in order to maintain the character of conservation areas, Camden will:
- *“Take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;*
 - *only permit development within conservation areas that preserves and enhances the character and appearance of the area;*
 - *prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;*
 - *not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and*
 - *preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage”.*

Amenity

- 7.76 **Policy DP26** (Managing the impact of development on occupiers and neighbours) seeks to manage the impact of development on occupiers and neighbours. Supporting **paragraph 26.3** expects a development to take into account its impact on visual privacy, overlooking, overshadowing, outlook, access to daylight and sunlight, the distance between properties, the vertical level of onlookers or occupiers and the angle of views.

Noise

- 7.77 **Policy DP28** (Night and vibration) stipulates that noise and vibration should be controlled and managed. Camden will seek to minimise the impact on local amenity from the demolition and construction phases of development.

Basement and lightwells

- 7.78 **Policy DP27** (Basement and lightwells) states that Camden will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.

Transport

- 7.79 **Policies DP16** and **DP17**, require developments to be integrated with the transport network, supported by sufficient walking, cycling and public transport links.

- 7.80 **Policy DP18** (Parking standards and limiting the availability of car parking) outlines parking standards, stating that Camden will seek to ensure that developments provide the minimum necessary car parking provision, and expect development to be car free in the Central London Area.
- 7.81 Supporting **paragraphs 18.12** and **18.13** state that all developments will be expected to meet Camden's cycle parking standards as a minimum. Cycle parking provision should be provided with convenient access to street level and must be secure and easy for everyone to use. For residential development, Camden will expect 1 storage or parking space per unit.
- 7.82 **Policy DP19** (Managing the impact of parking) resists development that would harm highway safety or hinder pedestrian movement, add to on-street parking demand where on street parking spaces cannot meet existing demand, require detrimental amendment to existing or proposed Controlled Parking Zones or create a shortfall of parking provision in terms of the Council's Parking Standards for bicycles, people with disabilities, service vehicles, coaches or taxis.

Accessibility

- 7.83 **Policy DP29** (Improving access) requires all buildings and places to meet the highest practicable standards of access and inclusion and expects spaces between buildings to be fully accessible.

Air Quality

- 7.84 **Policy DP32** (Air quality and Camden's Clear Zone) states that Camden will require air quality assessments where developments could potentially cause significant harm to air quality.

Water

- 7.85 **Policy DP23** (Water) states that Camden will require developments to reduce their water consumption, the pressure on the combined sewer network and the risk of flooding.

Design and Construction

- 7.86 **Policy DP22** (Promoting sustainable design and construction) expects schemes to demonstrate how sustainable development principles have been incorporated into the design and proposed implementation, as well as incorporating green or brown roofs and green walls wherever suitable.

Camden Planning Guidance 1 – Design (CPG 1, July 2015)

Heritage

- 7.87 **Section 3** emphasises the importance of Camden's Heritage. Development within conservation areas will only be permitted where they preserve and enhance the character and appearance of the area.

Rear extensions

- 7.88 The CPG outlines general principles that rear extensions should be designed to, these include:
- *“Be secondary to the building being extended, in terms of location, form, scale, proportions, dimensions and detailing;*
 - *respect and preserve the original design and proportions of the building, including its architectural period and style;*

- *respect and preserve existing architectural features, such as projecting bays, decorative balconies or chimney stacks;*
- *respect and preserve the historic pattern and established townscape of the surrounding area, including the ratio of built to unbuilt space;*
- *not cause a loss of amenity to adjacent properties with regard to sunlight, daylight, outlook, overshadowing, light pollution/spillage, privacy/overlooking, and sense of enclosure;*
- *allow for the retention of a reasonable sized garden; and*
- *retain the open character of existing natural landscaping and garden amenity, including that of neighbouring properties, proportionate to that of the surrounding area”.*

7.89 Additionally, materials should be sympathetic to the existing building (supporting **paragraph 4.11**).

7.90 Supporting **paragraphs 4.12** and **4.13** outline the principles for the height of rear extensions, whereby ground floor extensions are generally considered preferable to those at higher levels.

Roof alterations and extensions

7.91 The CPG states that additional storeys and roof alterations are likely to be acceptable where:

- *“There is an established form of roof addition or alteration to a terrace or group of similar buildings and where continued pattern of development will help to re-unite a group of buildings and townscape;*
- *Alterations are architecturally sympathetic to the age and character of the building and retain the overall integrity of the roof form;*
- *There are a variety of additions or alterations to roofs which create an established pattern and where further development of a similar form would not cause additional harm”.*

7.92 A roof alteration is likely to be unacceptable where:

- *“There is a unbroken run of valley roofs;*
- *Group of buildings have a roof line that is largely unimpaired by alterations or extensions;*
- *Buildings already have an additional storey or mansard;*
- *Alteration or extensions would add significantly to the bulk of the building especially where the building is already higher than neighbouring properties;*
- *Building has a roof line that is exposed to important London-wide and local views;*
- *Buildings whose roof construction or form are unsuitable for roof additions;*
- *Architectural style will be undermined by any additional at roof level;*
- *Buildings are part of a group where differing heights add visual interest and where a roof extension would detract from this variety of form;*

- *The scale and proportions of the building would be overwhelmed by additional extension”.*

Shopfronts

- 7.93 **Section 7** outlines the importance of shopfronts in increasing the attractiveness of a building and the local area. This is especially important in town centres and where the character and appearance of conservation areas and listed buildings is affected.
- 7.94 Supporting **paragraph 7.11** states that shopfront alterations should be in keeping with the local character sensitively relate to the scale, proportions and architectural style of the building and surrounding facades. Additionally, standardised ‘house-style’ frontages may have to be amended in order to harmonise with the surrounding context and respect the building, particularly in conservation areas and for listed buildings.

Recycling and Waste Storage

- 7.95 For residential development of 6 dwellings or fewer, servicing is usually carried out by kerbside waste and recyclable collections. It should be ensured that internal space is provided for recycling and refuse storage; comprising adequate space for a recycling receptacle, food waste caddy, and waste bin for non-recyclables. External storage for both waste and recyclables outside the buildings within the curtilage (for waste collectors) should be provided where possible.

Camden Planning Guidance 2 – Housing (CPG2, May 2016)

- 7.96 **Section 2** states that residential or mixed use development adding 1,000 sq m gross housing or more should provide affordable housing.
- 7.97 **Paragraphs 4.10 and 4.11** note that all habitable rooms should have a minimum headroom of 2.3 metres and any floor area where the ceiling height is less than 1.5 metres will not count toward the habitable floor space.
- 7.98 The CPG outlines Camden’s minimum internal space standards:

Table 7.3 Internal Space Standards *Source Camden CPG 2*

Number of Persons	1	2	3	4	5	6
Minimum floorspace (sqm)	32	48	61	75	84	93

- 7.99 **Paragraphs 4.20, 4.21 and 4.22** require residential developments to maximise sunlight and daylight and minimise overshadowing to adjoining properties. Developments should meet site layout requirements set out in the BRE Site Layout for Daylight and Sunlight – A Guide to Good Practice (1991).
- 7.100 **Paragraph 4.23** outlines the minimum requirements that need to be met to avoid unacceptable loss of daylight and/or sunlight. This includes that each dwelling should have at least one habitable room with a window within 30 degrees of south.
- 7.101 **Paragraph 4.26** states that all rooms within a basement should be able to function for the purpose of which they are intended and should have an adequate size, shape, door arrangement, and height, insulation from noise and vibration, and access to natural lighting, ventilation and privacy.
- 7.102 **Paragraph 4.29** highlights that where existing buildings may not be able to provide balconies or roof terraces, external amenity space such as access to communal gardens should still be provided.

- 7.103 **Section 5** of the CPG states that Lifetime Homes standards apply to all developments and applicants should justify failure to meet criteria.
- 7.104 Supporting **paragraph 5.5** states that wheelchair housing standards apply to all developments providing 10 or more self-contained homes, whereby 10% of market housing development to meet wheelchair housing standards, or should meet the 13 key Habinteg wheelchair housing criteria so that they can be easily adaptable to meet wheelchair housing standards.
- 7.105 Both Part M of the Building Regulations and BS 8300: 2009 should also be considered where appropriate.

Camden Planning Guidance 3 – Sustainability (CPG3, July 2015)

- 7.106 **Paragraph 2.5** states that developments involving 5 or more dwellings and/or 500 sqm (gross internal) floorspace of more are required to submit an Energy Statement which should demonstrate how carbon dioxide emissions will be reduced in line with the energy hierarchy.
- 7.107 **Section 4** stipulates that development involving a change of use or a conversion of 5 or more dwellings or 500 sqm of any floorspace, will be expected to achieve 60% of the un-weighted credits in the Energy category in their BREEAM assessment.
- 7.108 **Section 9** highlights Camden’s sustainability requirements, emphasising that the creation of 5 or more dwellings, or 500sqm of more of floorspace from an existing building will need to be designed in line with BREEAM Domestic Refurbishment.
- 7.109 Although the Code for Sustainable Homes has been withdrawn, new residential development should be accompanied by a Sustainability Statement that demonstrates how the development mitigates against and adapts to climate change. Table 7.4 outlines when sustainability assessments need to be carried out.

Table 7.4 Sustainability Assessments *Source Camden CPG 3*

Development type	What does this include?	Threshold for assessment	Appropriate assessment tool
Residential - Existing	Refurbishments, conversions and changes of use	5 dwellings or more 500sq m of floorspace or more	BREEAM Domestic Refurbishment
Non-residential	Includes offices, retail, industrial, education health	500sq m of floorspace or more	BREEAM
Mixed use schemes	If your scheme includes both residential and non-residential uses that total 500sq m of floorspace or more we will require a BREEAM assessment for the non-residential parts.		

- 7.110 **Paragraphs 9.9 and 9.10** require new residential development to demonstrate that the development is capable of achieving a maximum internal water use of 105 litres per person/day, with an additional 5 litres person/day for external use.

Camden Planning Guidance 4 – Basements and lightwells (CPG4, July 2015)

- 7.111 Section 2 outlines that Camden will only permit basement and underground development provided it does not cause harm to the built and natural environment and local amenity, result in flooding or lead to ground instability.

Applicant will be required to submit a Basement Impact Assessment (BIA) which is specific to the site and the proposed development.

Camden Planning Guidance 5 -Town Centres, retail and employment (CPG5, September 2013)

Retail

7.112 **Paragraph 2.9** states that where a planning application proposes the loss of a shop in retail use, Camden will consider whether there is a realistic prospect of such use continuing. Camden may require the submission of evidence to illustrate that there is no realistic prospect of demand to use the site for continued retail use.

7.113 The following information may be required by Camden where relevant:

- *“where the premises were advertised (shopfront; media, web sources etc) and when (dates);*
- *how long the premises were advertised for and whether this was over a consistent period;*
- *rental prices quoted in the advertisement (we expect premises to be marketed at realistic prices);*
- *copies of advertisements;*
- *estate agents details;*
- *any feedback from interested parties outlining why the premises were not suitable for their purposes; and*
- *consideration of alternative retail uses and layouts”.*

7.114 **Section 5** gives detailed guidance on Camden’s approach for securing small, affordable and independent shops in appropriate locations, in line with policy DP10 (Helping and promoting small and independent shops).

Employment

7.115 **Section 7** states that Camden may allow a change from B1(a) offices to another use in some circumstances, such as older office premises or buildings that were originally built as residential dwellings, with a priority placed on replacement use to be permanent housing or community use.

7.116 The various considerations that will be taken into account when assessing the change of use from office into non-business use include:

- *“The criteria listed in paragraph 13.3 of policy DP13 of the Camden Development Policies;*
- *the age of the premises. Some older premises may be more suitable to conversion;*
- *whether the premises include features required by tenants seeking modern office accommodation;*
- *the quality of the premises and whether it is purpose built accommodation. Poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion;*
- *whether there are existing tenants in the building, and whether these tenants intend to relocate;*
- *the location of the premises and evidence of demand for office space in this location; and*

- *whether the premises currently provide accommodation for small and medium businesses”.*

7.117 **Paragraph 7.18** outlines the evidence of marketing necessary when justifying the loss of employment uses. The minimum requirements will be expected:

- *“Use of a reputable local or national agent with a track record of letting employment space in the borough;*
- *A visible letting board on the property (constant throughout the marketing period);*
- *Marketing material should be published on the internet, including popular online property databases such as Focus;*
- *Continuous over at least 2 years from when the letting board is erected and the property is advertised online (i.e. not simply from when agents were appointed). We will consider shorter marketing periods for B1(a) office premises;*
- *Advertised rents should be reasonable, reflecting market rents in the local area and the condition of the property;*
- *Lease terms should be attractive to the market:*
 - *at least three years, with longer terms, up to five years or longer, if the occupier needs to undertake some works*
 - *and/or short term flexible leases for smaller premises which are appropriate for SMEs;*
- *A commentary on the interest shown in the building, including any details of why the interest was not pursued; and*
- *Where there is an existing employment use then we will require evidence that the tenant intends to move out.’*

Camden Planning Guidance 6 – Amenity (CPG6, July 2015)

7.118 **Section 6** stipulates that all buildings should receive adequate daylight and sunlight. Daylight and Sunlight Reports will be required where there is potential to reduce existing levels of daylight and sunlight.

7.119 **Section 7** emphasises that developments should be designed to protect the privacy of existing dwellings. There should normally be a minimum distance of 18m between the windows of habitable rooms of different units that directly face each other.

7.120 **Section 8** outlines that Construction Management Plans are required for developments that are on constrained sites or are near vulnerable buildings or structure.

Camden Planning Guidance 7 – Transport (CPG7, July 2015)

7.121 **Section 5** emphasises that car-free development is expected in Camden’s most accessible location and where a development could lead to on-street parking problems. Legal agreements will be used to maintain car-free and car-capped development over the lifetime of the scheme.

7.122 **Section 9** provides guidance on meeting cycle parking standards, stating that cycle parking should be provided off-street, within the boundary of the site, and be accessible and secure.

Camden Planning Guidance 8 – Planning Obligations (CPG8, July 2015)

7.123 **Section 7** outlines that if sustainable design and construction measures cannot be implemented through the approved design or secured through conditions, then a sustainability plan may be required as part of a S106 agreement. Design features such as energy efficient measure, renewable energy facilities and waste and recycling storage facilities may be specified through this sustainability plan.

Bloomsbury Conservation Area Appraisal and Management Strategy (BCAAMS, 2011)

7.124 The BCAAMS identifies the key management issues for the Bloomsbury Conservation Area. It is a material consideration in determining relevant planning applications.

7.125 The application site falls within Sub Area 12: Coram's Fields / Brunswick Centre. This is described as being dominated by large scale, green open spaces of historic significance in and around Coram's Fields, with a predominance of institutional use (hospital, university, education), recreational and community uses with secondary residential and office uses.

7.126 The BCAAMS identifies the site with the rest of the properties on this side of Grenville Street as making positive contribution to the appearance and character of the Conservation Area (Grenville Street 11-17 (consec), Downing Court and 83 Guilford Street).

7.127 **Paragraph 6.3** of the BCAAMS states that "*buildings that make a positive contribution to the Conservation Area contribute to the character of the immediate surroundings and the Conservation Area as a whole*".

Emerging Policy

Draft Camden Local Plan 2015

7.128 Camden is currently preparing a new Local Plan. On 24 June 2016 the Local Plan was submitted to the Secretary of State for Communities and Local Government for independent examination.

Employment

7.129 **Policy EC2** (Employment premises and sites) protects sites that are suitable for continued business use, in particular premises for small businesses and businesses and services that provide employment for Camden residents and supply local and Central London businesses.

Retail

7.130 **Policy TC3** (Shops outside of centres) states that Camden will only grant planning permission for loss of a shop outside designated centres provided that:

- a. *“alternative provision is available within 5-10 minutes’ walking distance;*
- b. *there is clear evidence that the current use is not viable; and*
- c. *within the Central London Area, the development positively contributes to local character, function, viability and amenity”.*

7.131 **Policy TC5** (Small and independent shops) outlines that Camden aims to promote the provision of small and independent shops and will encourage the occupation of shops by independent businesses and the provision of affordable premises.

Residential

7.132 **Policy H1** (Maximising Housing Supply) aims to secure a sufficient supply of homes to meet the needs of existing and future households through maximising supply of housing and exceeding a target of 16,100 additional homes from 2015/16 to 2030/31.

7.133 Supporting **paragraph 3.24** outlines how to make the best use of sites to deliver housing. Where vacant or underused sites are suitable for housing in terms of accessibility and amenity, and free of physical and environmental constraints that would prevent residential use, Camden expect them to be redeveloped for housing unless:

- *“The Plan seeks to protect existing uses on site, such as business premises, community uses and shops;*
- *the site is needed to meet other plan priorities for the area, particularly in the Hatton Garden area and other parts of Central London;*
- *the site is identified for another use in the Camden Site Allocations document; or*
- *it is demonstrated to the satisfaction of the Council that a housing development would not be financially viable”.*

7.134 **Policy H6** (Housing choice and mix) states that Camden will aim to minimise social polarisation and created mixed, inclusive and sustainable communities by seeking a wide variety of high quality homes suitable for Camden’s existing and future households.

8 Justification for planning permission

8.1 This section considers the key planning issues relating to the principle of redeveloping the site for residential and retail use.

8.2 The following issues are key to the application and are considered in turn below:

A. Land Use

- i. The loss of office use;
- ii. The amalgamation of commercial units and loss of A1 unit on the ground floor;
- iii. The principle of residential use;

B. Design and appearance

C. Impact on the character and appearance of the Bloomsbury Conservation Area

D. Impact on neighbouring amenity

E. Transport considerations

F. Waste Management

G. Sustainability considerations

A. Land Use

i. The loss of office use

8.3 The upper floors of the site are in lawful Class B1(a) use and have been vacant for over 15 years. They have fallen in disrepair after having been occupied by squatters in three separate occasions, and they are in need of structural works. In their present condition, the floors are not fit for occupation.

8.4 It is also noted that the building does not sit in a traditional office location that would be attractive to prospective office occupiers.

8.5 The proposed change of use of a small amount of office floorspace will ensure that the building is brought back into use and that much needed residential units are provided to the local market. The Marketability and Viability Reports confirm that there are no reasonable prospects for the office use in this building to be retained, as it would not be viable.

8.6 The proposal is therefore in compliance with paragraphs 22 and 51 of the NPPF.

8.7 Furthermore in line with Policy DP13, the following criteria have been used to assess whether the site is suitable for change to non-business use:

- a) *It can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use*

- A Marketability Report has been prepared which demonstrates that the upper floors are no longer suitable for office use and that the premises would only generate office employment interest if a substantial refurbishment was undertaken. This is further demonstrated in the Viability Report which confirms that returning the building to its original use would not be viable.
 - The status of the premises and the repeated occupations of the premises by squatters have limited the ability to market the offices. However, appeal precedents demonstrate that marketing evidence which is less than two years can justify the loss of Class B1(a) floor space.
- b) *There is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time*
- Due to the current status of the building, its internal configuration (it used to be a residential building before being converted), and its location within a commercial and residential area, it is not considered that the building is suitable for alternative business uses.
- c) *The level of employment floor space is maintained or increased*
- As explained in the Marketability and Viability Reports, it would not be feasible to maintain or indeed increase the existing level of employment floor space.
- d) *They include other priority uses, such as housing and affordable housing*
- The proposal includes the provision of housing, a priority use within Camden.
- e) *Premises suitable for new, small or medium enterprises are provided*
- The building is not suitable to provide premises for new, small or medium enterprises after a substantial refurbishment, as justified in the accompanying Viability Report.
- f) *Floor space suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses*
- The site has not been used for light industrial, industry or warehousing uses in the past, and is not suitable for other business uses.
- g) *The proposed non-employment uses will not prejudice continued industrial use in the surrounding area.*
- The site is located within an area of mixed-use character with no industrial premises.

8.8 In addition to the above, paragraph 13.3 of the DPD states that when assessing proposals that involve the loss of a business use, Camden will consider whether there is potential for that use to continue, taking into account whether the site:

- *Is located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing*
 - This is not applicable to the site.
- *Is in a location suitable for a mix of uses including light industry and local distribution warehousing*
 - The site is in a location suitable for a mix of office, retail and residential uses, rather than light industry and local distribution warehousing.

- *Is easily accessible to the Transport for London Road Network and/or London Distributor Roads;*
 - The site is easily accessible to the Transport for London Road Network and/or London Distributor Roads but any proposals would need to ensure that no congestion is added to these roads.
- *Is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water;*
 - This is not applicable to the site.
- *Has adequate on-site vehicle space for servicing*
 - The site has no on-site vehicle space for servicing.
- *Is well related to nearby land uses*
 - The site is well related to nearby land uses.
- *Is in a reasonable condition to allow the use to continue*
 - The Marketability and Viability Report confirm that the building is in a state of disrepair which does not allow the office use to continue.
- *Is near to other industry and warehousing, noise/vibration generating uses, pollution and hazards*
 - This is not applicable to the site.
- *Provides a range of unit sizes, particularly those suitable for small businesses (under 100sqm)*
 - This is not applicable to the site.

8.9 Local guidance CPG5 sets out additional considerations that should be taken into account when assessing the change of use from office into non-business use:

- *The age of the premises. Some older premises may be more suitable to conversion*
 - The building is Georgian, and was constructed for residential use. It is therefore considered suitable for conversion.
- *Whether the premises include features required by tenants seeking modern office accommodation*
 - This is not applicable to the site.
- *The quality of the premises and whether it is purpose built accommodation. Poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion*
 - The building is in a state of disrepair, having been vacant for a significant amount of time and subject to squatting in three separate occasions. It is not purpose built accommodation.
- *Whether there are existing tenants in the building, and whether these tenants intend to relocate*
 - The building has been vacant for over 15 years.

- *The location of the premises and evidence of demand for office space in this location*
 - The premises are not in a traditional office location. Furthermore, the state of disrepair of the building makes the retention of the office floorspace unviable, as demonstrated in the Viability Report.
- *Whether the premises currently provide accommodation for small and medium businesses*
 - This is not applicable to the site.

8.10 Considering the above, the justification for the loss of office use on site is in line with national and regional policy, as well as local policies CS8 and DP13, and local guidance CPG5.

ii. The amalgamation of commercial units and loss of A1 unit on the ground floor

8.11 The application site is not located within a classified frontage such as Central London Frontages or neighbourhood centres, and is within 100m from the Brunswick Centre which is a major retail centre with cafes and restaurants.

8.12 The proposal would retain a flexible A1/A3 unit at basement and ground floor levels, which amalgamates the existing A1 and A3 units.

8.13 The retention of the commercial unit at the application site is in line with LP guidance and local policy CS7.

8.14 Policy DP10 seeks to protect shops outside centres by only granting planning permission for net loss of shop floor space outside designated centres provided that:

- *Alternative provision is available within 5-10 minutes walking distance;*

8.15 The Brunswick Centre is located within a 2 minute walk and Marchmont Street (which is considered a local neighbourhood centre) is located within a 6 minute walk.

- *There is clear evidence that the current use is not viable;*

8.16 The existing Class A1 unit has been vacant for over 15 years and letting agents have confirmed that its floor space is too small (15sqm) to generate any market interest.

8.17 Furthermore, it should be noted that through the merging of two existing units, only 6sqm of retail floorspace will be lost which is negligible. The proposal therefore complies with local policies CS7 and DP10.

iii. The principle of residential use

8.18 Delivering housing is a London Mayoral priority, and Camden is earmarked to deliver a minimum of 8,892 homes by 2025 (LP Policy 3.3).

8.19 The application site falls within a predominately residential street, with neighbouring 13-17 Grenville Street and Downing Court consisting of residential apartments. Additionally, International House located on the east of Grenville Street consists of student accommodation. The proposed residential development will not therefore be discordant in land use terms, and will comply with policies CS1, CS6, DP1 and DP2.

8.20 Policies CS8 and DP13 confirm that when considering proposals for older office premises, residential is a suitable alternative use. Indeed, during the pre-application meeting, the officer stated that the introduction of Class C3 residential use would be welcomed subject to the loss of Class B1 floor space being acceptable. This is also in line with paragraph 51 of the NPPF.

- **Housing Density and Mix**

8.21 The proposed unit mix includes:

- 3 x 1 bed units
- 3 x 2 bed units

8.22 The proposed unit mix complies with local policies CS6 and DP5 which indicate 2 bedroom units as a priority for market housing. Specifically, policy DP5 requires at least 40% of new market housing to comprise 2 bedroom units.

- **Tenure**

8.23 No affordable housing will be provided on the site as the proposed scheme is not large enough to require such provision. This complies with local policy DP3 and CPG2 whereby only developments with a capacity to provide 10 or more units should make a contribution to affordable housing.

- **Internal space standards**

8.24 All flats have been designed to meet internal space standards set out in Camden policies as well as the 2016 London Plan, as shown in the table below.

8.25 All units will have good outlook, daylight and sunlight levels, be secure and comply with space standards including space for storage, thus complying with London space standards, local policy DP26 and CPG2.

Table 8.1 – Comparison between proposed units and Camden and London Plan internal space standards

Unit Number	No of bedrooms	London Plan internal floor area	Camden internal floor area	Proposed space
1	2	79 sqm	75 sqm	96 sqm
2	2	79 sqm	75 sqm	93 sqm
3	1	50 sqm	48 sqm	51 sqm
4	1	50 sqm	48 sqm	52 sqm
5	2	70 sqm	75 sqm	93 sqm
6	1	50 sqm	48 sqm	50 sqm

- **Lifetime Homes compliance and wheelchair accessibility**

8.26 The proposal seeks to meet all the requirements of Lifetime Homes which are available as part to this conversion, in line with CS paragraphs 6.40 and 6.41, policies DP6 and DP29, and local guidance CPG2.

8.27 However due to the nature of the existing building, not all criteria can be achieved and it will not be possible to provide disabled access to all floors due to the retained access arrangements.

B. Design and appearance

8.28 The Design and Access Statement and Heritage Statement provide a detailed description of the proposed design and how this integrates within the character of the local area. The Heritage Statement includes an explanation of the policy compliance of the various elements of the proposals.

8.29 To summarise:

i. Shopfront

8.30 The proposed design of the shopfront respects the character of the area and improves the appearance of the building by proposing a traditional architectural approach, thus complying with local policies CS14, DP24 and DP30, and local guidance CPG1.

ii. Improvements to the elevations

8.31 The front and part of the rear and side elevations will be carefully restored and cleaned, preserving the character of the building and enhancing its appearance. Specifically:

- All existing brickwork will be cleaned, repaired and repointed;
- All redundant ducts, soil pipes and rainwater goods will be removed;
- Structural repairs will be made where necessary;
- The portico surrounding the entrance to the Colonnade will be cleaned and repaired;
- The existing sash windows, which are not original, will be replaced with double glazed painted timber sliding sash windows;
- The entrances to the vacant Class A1 unit and office floors have no design value. These will be replaced with new, traditional hardwood entrance doors with doorcase and fanlight above; and
- The entrance to the storage room to the rear of the building (no.12) has also no design value. New painted joinery doors are proposed in its place, to provide access to the new refuse and cycle store.

8.32 The proposal is therefore in line with local policies CS14, DP24 and DP30, and local guidance CPG1.

iii. Infill extension

8.33 The infill extension will project approximately 1.9 metres from its existing position, towards the Colonnade, ensuring a new, high quality rear elevation which remains subordinate to the Grenville Street façade, respecting the historic character of the building as required by policies CS14 and DP24.

8.34 The infill extension has been considerably reduced from 3 metres to 1.9 metres following pre-application discussions with Camden.

8.35 The gable wall and mansard roof details to the rear of 11 Grenville Street were identified as “*interesting features*” in the 2013 Officer’s Delegated Report. Accordingly, they have been re-provided.

8.36 CPG1 stipulates that rear extensions should be sensitively and appropriately designed and should not harm the amenity of neighbouring properties through outlook or access to daylight and sunlight. The accompanying

Daylight and Sunlight Assessment demonstrates that the proposed infill extension will not harm the amenity of neighbouring occupiers.

8.37 CPG1 additionally outlines various factors that a rear extension should be designed to. These criteria have been used to assess the acceptability of the proposal an infill extension, as shown below:

a) *Be secondary to the building being extended, in terms of location, form, scale, proportions, dimensions and detailing;*

8.38 The proposed rear infill remains subordinate to the front elevation.

b) *Respect and preserve the original design and proportions of the building, including its architectural period and style;*

8.39 The gable wall and mansard roof details will be preserved, in line with the guidance provided in the 2013 Officer's Delegated Report.

c) *respect and preserve existing architectural features, such as projecting bays, decorative balconies or chimney stacks;*

8.40 This is not applicable to the site.

d) *respect and preserve the historic pattern and established townscape of the surrounding area, including the ratio of built to unbuilt space;*

8.41 The proposal respects and preserves the character of the local townscape: the rear extension retains the historic architectural language of the property and remains subservient to the main elevation.

e) *not cause a loss of amenity to adjacent properties with regard to sunlight, daylight, outlook, overshadowing, light pollution/spillage, privacy/overlooking, and sense of enclosure;*

8.42 The accompanying Daylight and Sunlight Report demonstrates that the proposed rear infill extension will not have a detrimental effect on the adjacent properties

f) *allow for the retention of a reasonable sized garden; and*

8.43 This is not applicable to the site.

g) *retain the open character of existing natural landscaping and garden amenity, including that of neighbouring properties, proportionate to that of the surrounding area*

8.44 This is not applicable to the site.

8.45 Considering the above, the proposed infill extension is in line with Camden local guidance CPG1.

iv. Mews building

8.46 The rear garage building has no design merit. It is proposed to demolish it and to replace it with a new mews house, of simple architectural style and London stock brickwork cladding which reflect the traditional mews houses on the opposite side of the Colonnade.

8.47 The mews house follows the same footprint of the existing rear extension and its height is in keeping with that of the other properties along the Colonnade.

8.48 It is considered that the mews building complies with local policies CS14, DP24 and DP25, which require developments to be of the highest standard of design and to respect local context and character.

v. Mansard roof extension

8.49 The design and acceptability of the roof extension has been informed by site characteristics.

8.50 Through the previous application and pre-application meetings with Officers, the mansard roof has evolved to ensure it integrates with the character and appearance of the building. Indeed, the proposed mansard is smaller than that refused in 2013 and the proposed fenestration is now in keeping with that of the main elevation.

8.51 The accompanying Heritage Statement confirms that the proposed mansard extension creates a pleasant visual transition between the taller Downing Court to the north and the lower properties to the south. The design is typical of Georgian buildings and will preserve the historic character of 11-12 Grenville Street and of the wider conservation area.

8.52 The party wall between nos. 11 and 12 will continue to be expressed on the roof to distinguish the traditional plot boundary between the buildings.

8.53 CPG1 outlines the various factors as to whether a roof addition would be considered unacceptable; these criteria have been used to assess the acceptability of the proposal for a mansard roof extension below:

a) There is a unbroken run of valley roofs

8.54 The existing roofline on Grenville Street is not uniform and therefore this proposal will not result in the unacceptable breaking of an impaired roof line.

b) Group of buildings have a roof line that is largely unimpaired by alterations or extensions

8.55 Buildings along Grenville Street and the immediate surroundings have been subject to alterations and modifications during their lifetime, therefore whilst the roof line is not characterised by alterations or extensions, the proposed mansard will be seen as a logical extension to the original building.

c) Buildings already have an additional storey or mansard

8.56 The building has no additional storey or mansard.

d) Alteration or extensions would add significantly to the bulk of the building especially where the building is already higher than neighbouring properties

8.57 The proposed mansard is lower in height than that of the 2013 application and has been designed so to complement the scale of the original building. The application site is not higher than neighbouring properties; indeed it is lower than the adjacent Downing Court.

e) Building has a roof line that is exposed to important London-wide and local views

8.58 The roof line of the building is not exposed to important London-wide views. The Design and Access Statement includes local views which demonstrate that the proposed mansard will enhance the appearance of the area and that of the building.

f) Buildings whose roof construction or form are unsuitable for roof additions

8.59 The roof form of 11-12 Grenville Street is suitable for roof additions.

g) Architectural style will be undermined by any addition at roof level

8.60 The proposed mansard extension has been designed to respect and complement the architectural style of the original building.

h) Buildings are part of a group where differing heights add visual interest and where a roof extension would detract from this variety of form

8.61 This does not apply to the application site.

i) The scale and proportions of the building would be overwhelmed by additional extension.

8.62 The extension has been designed to respect the scale and proportions of the building, as demonstrated in the Heritage Statement.

8.63 Overall the design of the mansard extension is traditional in form and materials, and covered in natural slate. Considering the above, the proposal complies with local policies CS14 and DP24, which promote good design, and local guidance CPG1.

C. Impact on the character and appearance of the Bloomsbury Conservation Area

8.64 As explained in the Heritage Statement, the proposed design takes cues from the character and appearance of the Bloomsbury Conservation Area, and ensures that the development is perceived as an enhancement of the local area.

8.65 Materials and architectural details have been chosen to respect the history of the local area, and are of the highest standards. The building will therefore continue to make a positive contribution to the Bloomsbury Conservation Area.

8.66 In light of the above, it is considered that the proposal complies with local policies CS14 and DP25 and local guidance CPG1.

D. Impact on neighbourhood amenity

8.67 The submitted Daylight and Sunlight Assessment demonstrates that the proposals will have no adverse impact on the amenity of neighbouring residential occupiers in terms of daylight and sunlight, outlook or privacy, in line with local policies CS5 and DP26, and local guidance CPG2 and CPG6.

8.68 Furthermore, the CMP confirms that neighbouring amenity will be protected during construction works, as required by CPG6.

E. Transport considerations

8.69 The site has excellent public transport accessibility; therefore it is proposed to deliver a car free development, in line with policies CS11, DP18 and DP19, and local guidance CPG7.

8.70 Bicycle storage for 5 residential dwellings is proposed to the rear of the site, whilst Unit 2 benefits from an internal bicycle store space.

8.71 The proposal complies with policy standards.

F. Waste management

- 8.72 Residential refuse and recycling storage will be located the rear of the building, besides the bicycle storage, thus complying with CS18, CPG1 and the advice provided at pre-application stage.
- 8.73 Within the refuse store, a 1100 litre refuse EuroBin, a 23 litre kitchen bin and a 140 litre mixed recycling bin will be provided, which is line with local policy requirements and guidance.

G. Sustainability considerations

- 8.74 In line with policies CS13 and DP22, a BREEAM Domestic Refurbishment Pre-Assessment has been submitted and a BREEAM target of 'very good' will be pursued.
- 8.75 An Energy Statement has been submitted to demonstrate how carbon dioxide emissions will be reduced in line with the energy hierarchy and thus falling in line with CPG 3.
- 8.76 A Sustainability Statement has also been prepared which demonstrates how the proposal complies with local and regional sustainability policies.

9 Conclusion

- 9.1 All levels of planning policy seek to support the provision of housing, especially within Camden where it is seen as a priority use.
- 9.2 This proposal will allow for the conversion of a small amount of existing office floor space to housing, vacant for over fifteen years and in state of disrepair. This will not only bring the building back into use, as reinstating the office use would not be financially or practically viable, but it will also contribute to the council's housing supply.
- 9.3 Equally, the conversion of the underused garage to the rear into self-contained mews house will enhance the character of the area whilst ensuring that the maximum amount of residential floor space is provided as part of the scheme.
- 9.4 The consolidation of the ground floor retail units will enhance the vitality of Grenville Street by delivering a larger, viable commercial unit which will serve the local community. There will be no loss of retail floor space as a consequence of the proposals.
- 9.5 The proposed design is of the highest quality. The scale and massing of the proposed rear and mansard extensions complement the existing context, respecting the character of the building and making a positive contribution to the local townscape.
- 9.6 Given the above, it is considered that this planning application is in accordance with local, regional and national planning policy and should be treated favourably.



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