

Date: 21st November 2014
Our Ref: 2014/6494/PRE
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Federica Ambrosini
Jones Lang LaSalle
30 Warwick Street
London
W1B 5NH

Dear Federica,

Re. Planning Pre-application advice meeting ref. 2014/6494/PRE.

**11-12 Grenville Street
London
WC1N 1LZ**

Conversion of the vacant upper storeys from office to residential use, and the consolidation of the existing Class A1 and A3 units into new commercial unit for Class A1 and Class A3 use.

I refer to our pre-application meeting held on **07/11/2014** about the above proposal.

Set out in this letter is a detailed note of the principal issues discussed at the meeting and advice on planning obligations and what you need to do in order to submit a valid planning application for your proposal. The letter also provides details of local groups that you may wish to notify or consult on your proposals in advance of submitting your application.

Site Description

The application site is a four storey, 5 bay wide Georgian terrace property on the west side of Grenville Road in the Bloomsbury Conservation Area. The property straddles the entrance to Colonnade. The facades of the property are constructed from a weathered stock brick with sash windows (although on the front elevation these are replacements). Reflecting the Georgian architecture character of subservient rear elevation to front elevation the rear of the building is plainer than the front. The rear elevation despite of unsympathetic alterations associated with services remain largely unaltered and is highly visible from the mews in Colonnade (most of which dates from a similar age to the application property).

Bloomsbury Conservation Area Appraisal and Management Strategy identifies application property 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). Immediately to the south is a small terrace of rebuilt Georgian style town houses which are similarly detailed to the application property. To the north is Downing Court which is an early 20th century six storey mansion block at the corner of Grenville Street and Bernard Street. The neighbouring streets of Bernard and Guilford are

lined with Georgian town houses, most of which are Grade II listed (11- 28 Bernard Street and 75-82 Guilford Street.

The surrounding area has a mixed use character with predominance of institutional (hospital, university, education), recreational and community uses with secondary residential and office uses. The area is relatively busy during the daytime as a result of these uses.

The site falls within Central London Area and is also within the Central Activities Zone (CAZ).

Planning History

2013/0833/P – Planning permission was *refused* in June 2013 for the Change of use of entire building from office (Class B1), restaurant and café (Class A3) and retail (Class A1) into residential (Class C3) comprising 6x 1 bedroom and 1x 2 bedroom flats and 1x 3 bedroom maisonette together with erection of mansard roof extension, reinstatement of front lightwell with railing, alterations to the front elevation (new windows to shopfront), alterations to rear elevation including insertion of balconies to first, second and third floor levels and installation of new doors and windows, replacement of existing single storey rear extension (at no 11), erection of four storey infill rear extension (above ground floor level), alterations to south side and north side ground floor elevations and alterations to rear boundary wall and replacement of railing.

2009/4992/P – Planning application was *withdrawn* on 23/12/2009 for the 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. The associated conservation area consent (ref: 2009/4993/C) for the demolition of existing building comprising basement, ground and three storeys above (Class A1, A3 and B1a) was also withdrawn on 23/12/2009. The proposed demolition was considered not to be sufficiently justifiable.

9400452 - Planning permission was *granted* on 07/07/1994 for the 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.

Considerations

During our meeting we discussed the following matters which are considered to be material considerations:

- Land use issues (loss of office space; loss of A1/A3; creation of residential units and unit mix);
- Design;
- Amenity;
- Transport and highway impacts;
- Sustainability;
- CIL

Land use

Existing situation

The existing building consists of a floor area of 415.6sqm of which 26sqm is under Class A1, 46sqm is under Class A3 and 343.6sqm is in under Class B1 office use. The proposal would result in loss of the office floor space in order to gain residential units. The ground floor café/restaurant (Café Romano) is still operating and its lease

is apparently close to expiration. The small ground floor retail unit to the south of Colonnade entrance which used to be occupied by a newsagent is currently vacant. The rest of the building consists of vacant offices which are currently occupied by security guardians having recently been cleared of squatters.

Loss of office accommodation

Policy CS8 (Promoting a Successful and Inclusive Camden Economy) seeks to ensure that the borough retains a strong economy. It seeks to do this by, amongst other things, safeguarding existing employment sites that meet the needs of modern industry and employers and provide facilities for small and medium sized enterprises.

Policy DP13 provides more detailed information as to how these aims will be implemented. It states that the Council will retain land and buildings that are suitable for continued business use and resist a change to non-business use unless it can be demonstrated that the site or building is no longer suitable for its existing business use and that 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.

The offices have been vacant since 2005. The applicants argue that the existing office spaces are not viable to sustain as they lack features for a modern office environment and substantial interventions would be required to bring it up to standards. It was not possible to visit the offices as they are currently being occupied by 'live in guardians'.

A letter from property Management Company '*Hurford Salvi Carr Ltd*' was submitted with this pre-application which states that the offices are in disrepair and states that they received no firm interest in the office premises when they were marketed in 2009. The letter does not give any further marketing information. Although it is acknowledged that the offices are not in good condition, I remain unconvinced that any effort has been made to refurbish them over the past number of years. The letter which has been submitted states that the offices have been vacant since 2005 and were in a really poor condition in 2009. Given the length of time, it is difficult to understand why there was no interest or investment in making them attractive to potential occupiers.

Notwithstanding this, Paragraph 7.3 of the CPG5 states that the Council may change of B1(a) office to another use in some circumstances, such as older office premises of buildings that were originally built as residential dwellings. CPG5 also states that a number of considerations listed in paragraph 13.3 of policy DP13 need to be taken consideration. When this criteria is taken into consideration, the office accommodation could still be viable as:

- It is highly accessible in transport terms being close to Kings Cross and Russell Sq tube stations and a number of bus routes;
- It has adequate space for servicing;
- It could continue to be used for business space if invested in; and
- It could possibly offer a range of unit sizes for SME's.

In addition to the LDF and CPG, careful thought needs to be given to the loss of office accommodation in a site which is within the Central Activities Zone (CAZ). Emphasis on the importance of the CAZ was most recently highlighted by the Department for Communities and Local Government when the area was granted an exemption from the changes to the Town and Country Planning (General Permitted Development) Order 1995. The changes to this Order came into effect in May 2013 and allow for the change of use from (B1) office to (C3) residential without the need

for a planning application to be submitted. In granting this exemption, it is clear that the Government considered it vital in economic terms to preserve employment floorspace in areas which are important to contributing to the vitality and viability of London both nationally and internationally. Therefore any loss of office accommodation in this area needs to be fully justified with detailed information incorporating marketing details which show that marketing has been sustained over a period of AT LEAST 2 years. This advice is consistent with information given to the owners of this site over the past number of years.

It is considered that in the absence of a robust marketing justification the loss of existing office accommodation would be contrary to the aims of policies CS8 and DP13 and permission would not be granted for its loss.

Loss of A1 and A3 units:

The application site is not located within in a classified frontage such as Central London Frontages or neighbourhood centres and is within 100m from Brunswick Centre which is a major retail centre with cafes and restaurants in this neighbourhood. The proposal would retain a flexible A1/A3 unit at basement and ground floor level.

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

- Alternative provision is available within 5-10 minutes walking distance;
- There is clear evidence that the current use is not viable; and
- within the Central London Area, the development positively contributes to local character, function, viability and amenity.

Section 4 of CPG 4 gives detailed guidance on the Council's approach for securing small, affordable and independent shops in appropriate locations. Although the existing units are within 5-10 minutes walking distance to Brunswick Centre they are in a prominent location to be used by locals, workers and visitors. Although it is acknowledged that the small A1 unit is currently vacant the A3 unit is still in operation and adds to the character, function and vibrancy of the area. The A3 unit is also popular with the locals evidenced by a petition against its loss being submitted to the Council during the last application. Therefore it is likely that there would be strong local resistance to the loss of this unit and it is considered that every effort should be made to retain the existing use and occupier. Furthermore, the loss of the A1 unit would need to be fully justified and evidence/marketing information given as to why it is not possible to let it.

Creation of residential units

Had the loss of office use been considered acceptable, the principle of providing residential accommodation at the site would be supported by policies CS6 and DP2.

Mix

Policy DP5 seeks to provide a range of unit sizes to meet demand across the borough. In order to define what kind of mix should be provided within residential schemes, Policy DP5 includes a Dwelling Size Priority Table. The Council would expect any housing scheme to meet the priorities outlined in the table, or provide robust justification (such as RP requirements) for not providing a mix in line with the table and the requirements outlined in paragraph 5.5 of the supporting text to the policy. The mix proposed as part of this pre-app scheme (2x1 beds; 3x2 beds and 1x3 bed) is considered to be appropriate.

Affordable Housing

Policy DP3 expects all developments with a capacity to provide 10 units or more to make a contribution to affordable housing. DP3 introduces a sliding scale for developments between 10 units and 50 units. However the proposed scheme is not large enough to require a contribution to affordable housing.

Lifetime Homes and Wheelchair Housing

All units should meet lifetime homes standards. This should be demonstrated in the submission by way of a Lifetimes Homes Assessment; however it is unlikely that all of the standards would be met in a conversion scheme such as this.

Standard of accommodation

All flats would be considered against the standards outlined within the Mayor's London Housing SPG 2012. All units should have good outlook, daylight and sunlight levels, be secure and comply with space standards including space for storage. It appears that the London space standards have been met.

Flats 3-6 would be accessed by a stair core with a ground floor entrance on the Grenville St elevation. Units 1 and 2 would benefit from their own private entrances. From the plans submitted it appears that all units, would be dual aspect. I am concerned, however about the refuse and recycling facilities being in the same space as the cycle parking – this should be 2 separate enclosures.

Design

The proposal to introduce a mansard roof extension is considered to be unacceptable and contrary to the principles of CPG1 (para 5.8) where the introduction of a roof extension would interrupt an unbroken or unimpaired roofline. This is consistent with advice given to the applicants in previous meetings and was a reason for refusal in the 2013 planning application.

It is understood that the proposed infill rear extension would project approximately 3 metres from its existing position, towards the Colonnade. This is considered to significantly alter the rear elevation and overall form of the building and could not be considered to be a subordinate extension which respects the historic pattern of the building. Furthermore it is considered that the extension would create an increased sense of enclosure when approaching Grenville St from the Colonnade, detracting from the conservation area and potentially resulting in an unsafe environment.

The change of use of the existing shed/garage to the rear of the building to a mews dwelling is considered to be acceptable in principle but the roof would need to be significantly altered as it is considered to be overly bulky and dominates the building. A more traditional mews type property with a low roof would be more acceptable here- taking reference from the properties across the street (however see amenity section below). Additionally the opening up of the lightwell to the side would be very visible from the public realm and is not considered to be an attribute which constitutes a traditional mews type property. The opening is very large and when taken together with the roof, the building appears very large and not suited to the site. Furthermore, any excavation works would require the submission of a Basement Impact Assessment (BIA) in line with Camden's CPG4 (basements) and this assessment would be independently reviewed at the expense of the applicant.

Neighbouring amenity

Policy DP26 states that development should protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause

harm to amenity in terms of privacy and overlooking, overshadowing and outlook, sunlight and daylight, noise and vibration, odour, fumes and dust and microclimate.

I have concerns over the potential impact of loss of amenity to the occupants of O'Donnel Court as a result of the 2 storey mews building to the rear. The windows at ground and lower ground floor would certainly be impacted upon in terms of outlook and it is also likely that the first floor level would be affected as a result of the scheme. If an application were to be submitted, daylight/sunlight calculations would be required.

Transport and Highways impacts

The site has a PTAL value of 6a meaning that access to public transport is considered to be excellent – access to Kings Cross and Russell Sq tube stations are within walking distance.

Car Parking

Policies DP18 and CS11 seeks to minimise the level of car parking provision in new developments and expects all development to be car free in the Central London area. No parking is proposed. The development would be secured as car free via a S106 legal agreement.

Cycling

From a residential perspective the Council would use TfL's Parking standards that stipulate that a minimum of one space is required for dwellings up to 2 bedrooms. For units with 3 or more bedrooms the standards require the provision of 2 spaces per unit.

As outlined in CPG7, 'cycle parking needs to be accessible (in that everyone that uses a bike can easily store and remove a bike from the cycle parking) and secure. The route from cycle parking to street level should be step free. Cycle parking inside buildings should be at the entrance level of the building or accessible by a ramp or lift from street level that can accommodate a bike'.

Construction Management - DP20 and DP21 seek to protect the safety and operation of the highway network. For some development this may require control over how the development is implemented (including demolition and construction) through a Construction Management Plan (CMP) secured via S106 agreement.

The proposal to would be likely to result in a number of construction vehicle movements to and from the site, which would have a significant impact on the local transport network and particularly on the Colonnade. This is of concern as the site is located in a highly constrained area in regard to transport, however there is space to the front of the site which could potentially be used for a skip/vehicles etc. Notwithstanding this, in order to manage the construction, a draft Construction Management Plan would be required alongside the submission of the application.

Other matters – Financial contributions towards public realm improvements and highways works are also generally required and would be secured via a S106 agreement but in this instance it is proposed to improve the public realm area to the front of the building as part of the overall scheme. This would be welcomed and a proposal would be required upfront in the event of any application so that discussions with the Councils public realm department could be undertaken as to its benefits.

Sustainability

Policy DP22 (Promoting sustainable design and construction) states that the Council will require development to incorporate sustainable design and construction

measures. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. As of 1 October 2013 new developments are expected to achieve a 40% reduction in carbon when compared to Building Regs 2010 (see London Plan policy 5.2).

Energy efficient design requires an integrated approach to solar gain, access to daylight, insulation, thermal materials, ventilation, heating and control systems. These should be considered in relation to each other when designing a scheme.

An energy statement should be submitted with an application of this nature which demonstrates how carbon dioxide emissions will be reduced in line with the energy hierarchy. CPG3 - Sustainability provides guidance on what should be included in an energy statement. Further details can be found in CPG3- Sustainability.

The new residential accommodation within the existing building would be required to meet very good in a BREEAM Domestic Refurbishment Assessment. Please see CPG3 – Sustainability for further details.

A BREEAM DR Pre-assessment should be submitted as part of any application submission, with a post construction review to be secured via a legal agreement to any approval.

Community Infrastructure Levy

The development would be subject to the Mayor of London's Crossrail CIL at £50 per sqm of new floorspace (net uplift).

Please be aware that Camden CIL is likely to be adopted by the time any application on this site is considered at committee – March 2015.

S106 Contributions

Local community benefits (CS19)

Any residential development will lead to increased pressure on the existing local community facilities within the area, such as the open space, schools, health and leisure uses. As such it is crucial that the development at the very least contributes towards supporting, improving and enhancing existing facilities.

Likely s106 terms (subject to change when Camden CIL adopted in March next year)

- Car free
- Public Open Space contributions - see formula in CPG6
- Education contributions – see formula in CPG8
- Construction Plans
- CfSH 'level 4' minimum and BREEAM DR 'very good' minimum
- Energy Statement
- Environmental improvements / public realm contribution
- Highways contribution

Planning balance and conclusion

I accept there are clear benefits to this pre-app scheme but they do not outweigh the harm that would be caused to the area by the loss of the office space in the CAZ without adequate justification – the scheme would not just fail on one of the tests of DP13 but fails on both tests. The loss of B1 office therefore remains unjustified. In addition to this the ambitions for increased floorspace of such an extent in a building of this size are unrealistic and need to be refined. Concern has been raised on many occasions with regards to a mansard roof in this location and the infill extension to

the rear was also objected to in the previous application. Finally, the new house to the rear requires more detailed mews type approach.

Whilst it is acknowledged that an increase in homes is a priority for the borough but the public benefit arising from 6 new residential units is not considered to be adequate in addressing the loss of office and design concerns at this stage.

Details of what you are required to submit to with your application can be found on the Council's website:

<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/making-an-application/supporting-documentation--requirements-/>

The site is within the Bloomsbury Conservation Area and the local CAAC can be contacted through Hugh Cullum or Tony Tugnutt www.bloomsburylives.co.uk/about-us/contact-us/

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Please note that if you (the applicant or their representative) have drafted any notes of the pre-application meeting(s) held with the council you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

If you have any queries about the above letter or the attached document please do not hesitate to contact **Eimear Heavey** on **020 7974 2949**.

Thank you for using Camden's pre-application advice service and apologies for the delay in getting these comments to you.

Yours sincerely,

Eimear Heavey
Senior Planning Officer