

Delegated Report		Analysis sheet	Expiry Date:	06/01/2017
		N/A / attached	Consultation Expiry Date:	15/12/2016
Officer			Application Number(s)	
Robert Lester			2016/4372/P	
Application Address			Drawing Numbers	
11-12 Grenville Street London WC1N 1LZ			790(01)001B, 790(01)100B, 790(01)101A, 790(01)102A, 790(01)103A, 790(01)104A, 790(01)105A, 790(01)200B, 790(01)201A, 790(01)300B, 790(01)301B, 790(01)600G, 790(01)601H, 790(01)602F, 790(01)603F, 790(01)604E, 790(01)605F, 790(01)700C, 790(01)701A, 790(01)800 D, 790-(01)801A, Schedule of Areas (790-6-04D), Design & Access Statement, Planning Statement, Sustainability Statement & BREEAM Assessment, Marketing Statement, Energy Statement, Energy Strategy, Daylight & Sunlight Assessment, Heritage Appraisal, Noise Impact Assessment, Financial Viability Assessment, Draft Construction Management Plan, Basement Impact Assessment, Basement Impact Audit.	
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature	
Proposal(s)				
Change of use of upper floor offices (B1) to residential (C3) use to provide 5 x residential units (3 x 1 bed and 2 x 2 bed), demolition of existing rear garage and erection of a replacement 2 storey 2 bed mews dwelling with basement extension, consolidation of the existing ground floor retail (A1) and cafe (A3) units to provide a replacement retail/restaurant (A1/A3) unit, external alterations to the main elevation, mansard roof extension with parapets/chimneys and dormer windows, replacement double glazed sash windows, replacement shopfront, alterations to ground floor entrances and a 1st to 3rd floor rear infill extension with new window openings.				
Recommendation(s):		Refused		
Application Type:		Full Planning Permission		

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice					
Informatives:						
Consultations						
Adjoining Occupiers:	No. notified	74	No. of responses	4	No. of objections	4
			No. electronic	4		
Summary of consultation responses:	<p>74 neighbouring properties were consulted by letter between the 26/09/16 – 17/10/16, a site notice was placed at the site between the 28/09/16 – 19/10/16 and an advert was placed in the local press between the 30/09/16 – 21/10/16.</p> <p>74 neighbouring properties were reconsulted by letter between the 15/11/16 – 06/12/16, a site notice was placed at the site between the 23/11/16 – 14/12/16 and an advert was placed in the local press between the 24/11/16 – 15/12/16.</p> <p>4 objections were received with the following points of objection:-</p> <p><u>Land Use</u></p> <ul style="list-style-type: none"> • The development would result in the loss of the existing restaurant café unit which has been operating at the site for 14 years and has established customer base in the area. • 5000 customers of the existing restaurant signed a petition objecting to the former application • The existing restaurant extract system may impact on the future residents of the upper floors and has not been taken into account <p><u>Design</u></p> <ul style="list-style-type: none"> • Scale, footprint and height: Two storey mews building to the rear would reduce light to flats at Downing Court. The proposed mansard and rear infill extensions would reduce privacy and light to flats at Downing Court. 					
CAAC/Local groups* comments: *Please Specify	No comments received					

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 the 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).

Relevant History

2014/6494/PRE - Pre-application advice was provided in November 2014 for the Change of use of upper floor offices (B1) to residential (C3) use to provide 5 x residential units (2 x 1 bed, 2 x 2 bed and 1 x 3 bed), demolition of existing rear garage and erection of a replacement 2 storey 2 bed mews dwelling with basement extension, consolidation of the existing ground floor retail (A1) and cafe (A3) units to provide a replacement retail/restaurant (A1/A3) unit, external alterations to the main elevation, mansard roof extension with parapets/chimneys and dormer windows, replacement double glazed sash windows, replacement shopfront, alterations to ground floor entrances and a 1st to 3rd floor rear infill extension with new window openings.

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.

Relevant policies

National Planning Framework (2012)

The London Plan (2016)

LDF Core Strategy and Development Policies

Core Strategy

- CS1 Distribution of growth
- CS3 Other highly accessible areas
- CS5 Managing the impact of growth and development
- CS6 Providing quality homes
- CS7 Promoting Camden's centres and shops
- CS8 Promoting a successful and inclusive Camden economy
- CS9 Achieving a successful Central London
- CS11 Promoting sustainable and efficient travel
- CS13 Tackling climate change through promoting higher environmental standards
- CS14 Promoting high quality places and conserving our heritage
- CS17 Making Camden a safer place
- CS18 Dealing with our waste and encouraging recycling
- CS19 Delivering and monitoring the Core Strategy

Development Policies

- DP1 Mixed use development
- DP2 Making full use of Camden's capacity for housing
- DP5 Homes of different sizes
- DP6 Lifetime homes and wheelchair housing
- DP10 Helping and promoting small and independent shops
- DP13 Employment premises and sites
- DP16 The transport implications of development
- DP17 Walking, cycling and public transport
- DP18 Parking standards and limiting the availability of car parking
- DP19 Managing the impact of parking
- DP20 Movement of goods and materials
- DP21 Development connecting to the highway network
- DP22 Promoting sustainable design and construction
- DP23 Water
- DP24 Securing high quality design
- DP25 Conserving Camden's heritage
- DP26 Managing the impact of development on occupiers and neighbours
- DP27 Basements and lightwells
- DP28 Noise and Vibration
- DP29 Improving access
- DP30 Shopfronts
- DP32 Air quality and Camden's Clear Zone

Camden Planning Guidance (2011)

- CPG1 (Design) – Sections 2, 4, 5, 7 and 10
- CPG2 (Housing) – Sections 4 and 5
- CPG3 (Sustainability) – Sections 2, 4 and 9

CPG4 (Basement and lightwells) – section
CPG5 (Town Centres, Retail and Employment) – Sections 4 and 6
CPG6 (Amenity) – Section 6, 7 and 8
CPG7 (Transport) – Sections 5 and 9
CPG8 (Planning obligations) – Sections 7,

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

Assessment

Proposal

The proposed development is for the change of use of the upper floor offices (B1) to residential (C3) use to provide 5 x residential units (3 x 1 bed and 2 x 2 bed), demolition of the existing rear garage and the erection of a replacement 2 storey 2 bed mews dwelling with basement extension, consolidation of the existing ground floor retail (A1) and cafe (A3) units to provide a replacement retail/restaurant (A1/A3) unit, a mansard roof extension with parapets/chimneys and dormer windows, a 1st to 3rd floor rear infill extension with new window openings, external alterations to the main elevation including replacement double glazed sash windows, replacement shopfront and alterations to ground floor entrances.

Background

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

1. The loss of employment floorspace, failure to support local economic activity and the loss of employment opportunities within the Borough contrary to policies CS8 and DP13.
2. In the absence of a robust marketing justification, the loss of the retail/restaurant floorspace would compromise the Council's ability to protect and promote small and independent shops in the area and would harm the character, function and vibrancy of the area, contrary to policies CS7 and CS8.
3. The mix of the development by reason of insufficient 2/3 bed units would fail to contribute to the creation of mixed and inclusive communities, contrary to policies CS6 and DP5.
4. The mansard extension, by reason of its height, bulk and massing, would be an incongruous, overbearing and dominant addition to the local townscape which would fail to respond to the local scale, form and grain of development characteristic of the area, to the detriment of the character and appearance of the Conservation Area and wider streetscape contrary to policies CS14, DP24 and DP25.
5. The proposed infill rear extension by reason of its location, bulk and design would erode the character of the rear elevation of the building and would harm the character and appearance of the building and wider conservation area contrary to policies CS14, DP24 and DP25.
6. The proposed single storey rear extension by reason of its elaborate design would not be in keeping with the character and appearance of the building and the wider conservation area contrary to policies CS14, DP24 and DP25.
7. In the absence of a legal agreement for car-free housing the development would be likely to contribute unacceptably to parking stress and congestion in the surrounding area contrary to policies CS11, CS19, DP18 and DP19.
8. In the absence of a legal agreement securing a Construction Management Plan the development

would be likely to contribute unacceptably to traffic disruption and general highway and pedestrian safety contrary to policies CS11, DP16, DP20, DP2 and DP22.

9. In the absence of a legal agreement securing highway works contribution (to ensure reinstatement and repaving of the footway adjacent to the site) would be likely to harm local transport infrastructure contrary to policies CS19, DP16, DP2 and DP26.

10. In the absence of a legal agreement to secure public open space contributions the development would be likely to contribute unacceptably to pressure on local open space facilities contrary to policies CS15, CS19 and DP31.

11. In the absence of a legal agreement securing a post-construction BREEAM assessment to demonstrate BREEAM 'very good', the development would fail to ensure proper standards of sustainability are provided contrary to policies CS13, CS16, CS19, DP22, DP23 and DP32.

12. In the absence of a legal agreement to secure contributions towards educational facilities, the development would be likely to result in additional pressures on local educational facilities contrary to policies CS5 and CS19.

Pre-application advice was subsequently provided in November 2014 for the change of use of upper floor offices (B1) to residential (C3) use to provide 5 x residential units (2 x 1 bed, 2 x 2 bed and 1 x 3 bed), demolition of existing rear garage and erection of a replacement 2 storey 2 bed mews dwelling with basement extension, consolidation of the existing ground floor retail (A1) and cafe (A3) units to provide a replacement retail/restaurant (A1/A3) unit, external alterations to the main elevation, mansard roof extension with parapets/chimneys and dormer windows, replacement double glazed sash windows, replacement shopfront, alterations to ground floor entrances and a 1st to 3rd floor rear infill extension with new window openings. The main issues from the Council's pre-application advice were as follows:

1. Land Use /Principle of Development: In the absence of a robust marketing justification the loss of the existing office accommodation would be contrary to the aims of policies CS8 and DP13 and permission would not be granted for its loss. The loss of the retail unit would need to be justified with marketing evidence and every effort should be made to retain the existing café unit.

2. Housing: No affordable housing would be required and the housing mix would need to comply with policy DP5.

3. Design: The proposed mansard roof extension would be unacceptable and contrary to the principles of CPG1, where the introduction of a roof extension would interrupt an unbroken or unimpaired roofline. The rear infill extension (with a depth of 3 m) would significantly alter the rear elevation, the overall form of the building, would not be a subordinate extension which respects the historic pattern of the building and increases the enclosure of the Colonnade. The mews dwelling to the rear was considered to be acceptable in principle, but the design needs to be changed to a more traditional mews taking reference from the mews properties opposite and the scale of the lightwell and pitched roof needed to be reduced.

4. Neighbouring Amenity: Concerns were raised regarding the amenity impact of the mews dwelling on the adjacent flats in terms of loss of light and outlook.

5. Transport and Highway Impacts: The development would need to be secured as car free via a S106 agreement. Cycle parking would be required. A construction management plan and financial contribution towards local highway works would be secured by s106 agreement. Separate refuse and cycle storage would be needed.

6. Sustainability: The development would be required to achieve a 40% carbon reduction.

7. Conclusion/Planning Balance: The benefits of providing additional housing supply were not considered to outweigh the loss of offices and design concerns.

Main Issues

The main issues in the assessment of this planning application are i) the land use issues associated with the change of use of the existing office and retail uses, ii) the design and heritage issues related to the proposed mansard roof extension, rear mews dwelling, rear infill extension and other

alterations, iii) the house mix and quality of the proposed accommodation, iv) the amenity impact on neighbouring properties and the v) transport and vi) sustainability implications of the development.

Assessment

Land Use/Principle of Development

Loss of Office Use

The development proposes the change of use of the existing office (B1a) floorspace on the site (288 sq.m) to residential use (C3).

This is contrary to policy CS8, which seeks to ensure that the borough retains a strong economy by safeguarding existing employment sites and policy DP13, which seeks to protect existing employment use unless it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use and 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.

As set out in the background section above, the previous planning application ref: 2013/0833/P was refused for this reason and this issue was raised in pre-application advice ref: 2014/6494/PRE.

The applicants supporting information states that the offices have been vacant since 2001, have a poor internal condition, are unsuitable for modern office usage, require replacement internal services and structural works and are unviable for office reuse.

The supporting text to policy DP13 sets out the issues that the Council will consider when assessing proposals that involve the loss of a business use. It is acknowledged that the building is in a poor condition and requires internal refurbishment to enable office reuse. However, the site is located in a highly accessible location and is considered to be suitable for small businesses. There is also a significant demand for office use in the Central London area shown by recent appeal decisions in this area. Furthermore, as set out in the pre-application advice, the site is located within the Central Activities Zone (CAZ) which is exempt from (B1) office to (C3) permitted development rights. The Government considered it important 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. Consideration of the scheme against these factors is inconclusive, as although the building is in a poor condition and requires internal refurbishment it is located in an area which is suitable for office reuse and where there is demand for that use.

The supporting text to policy DP13 also states that where a change of use to a non-business use is proposed, the applicant must demonstrate to the Council's satisfaction that there is no realistic prospect of demand to use the site for an employment use. The applicant must submit evidence of a thorough marketing exercise, sustained over at least two years. This requirement for 2 years marketing was also stated in the pre-application advice ref: 2014/6494/PRE.

The application has been submitted with no marketing information. The marketing letter from commercial property agents Hurford Salvi Carr dated 18th September 2014 (also submitted with the pre-application scheme) states that they 'mentioned the availability of the premises to a number of applicants' but received no interest. This falls significantly short of the minimum requirements for marketing exercises for the loss of employment uses which is set out in CPG5 (paragraph 7.18). This application has therefore not been submitted with adequate marketing information and it appears that no additional marketing has been completed since the 2014 pre-application letter.

It is considered that in the absence of a robust marketing justification, the loss of the existing office

accommodation would be contrary to the aims of policies CS8 and DP13.

Loss of Retail Use

The existing site contains a café (A3 use) at 11 Grenville Street with a floorspace of 113 sq.m and a vacant retail unit (A1 use) at 12 Grenville Street with a floorspace of 15 sq.m (128 sq. m ground floor commercial use overall). The development would involve the change of use of the retail unit to residential (C3). The development would re-provide a flexible restaurant/retail (A1/A3) unit at number 11 with a floorspace of 122 sq. m (an increase of 9 sq.m compared to the existing unit at no. 11). The development would therefore result in the loss of the small retail unit at no. 12 and 6 sq. m of retail floorspace overall.

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.

Policy DP10 seeks to protect shops outside centres by only granting planning permission for net loss of shop floorspace outside designated centres provided that (i) alternative provision is available within 5-10 minutes walking distance; (ii) there is clear evidence that the current use is not viable; and (iii) within the Central London Area, the development positively contributes to local character, function, viability and amenity. CPG 5 states that where a planning application proposes the loss of a shop in retail use, the Council will consider whether there is a realistic prospect of such use continuing.

The former application ref: 2013/0833/P was refused on the ground of the loss of the retail/restaurant floorspace harming the character, function and vibrancy of the area contrary to policies CS7 and CS8. However, that application proposed the change of use/loss of the entire ground floor commercial use to residential. The loss of the small retail unit at no. 12 alone would not compromise the vitality or viability of the area. It is accepted that this small unit with limited usability and a narrow frontage which does not contribute significantly towards an active frontage. It is acknowledged that the existing café use is an independent café which is popular in the local area. However, the development would retain a flexible retail/restaurant unit at no. 11 and therefore the development would allow the existing café use to return to the site (subject to an acceptable rear extract duct design).

Design and Heritage Impact

In considering developments affecting a conservation area, Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires that local authorities shall pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

In this case the site forms part of the Bloomsbury Conservation Area. In line with the above statutory duties and recent case law, considerable importance and weight has to be attached the impact of the heritage assets and their setting. It should also be noted that the duties imposed by section 72 of the Act is in addition to the duty imposed by section 3(6) of the Planning and Compulsory Purchase Act 2004, to determine the application in accordance with the development plan unless material considerations indicate otherwise

The site is identified as making a positive contribution in the conservation area along with the other buildings in the block (nos. 13-17 consec and Downing Court).

Policy DP24 states that the Council will require all developments, including alterations and extensions to be of the highest standard of design and respect character, setting, form and scale of the neighbouring properties and character and proportions of the existing building. Policy DP25 seeks to

preserve and enhance important elements of local character in order to maintain the character of the conservation areas.

Bloomsbury Conservation Area Appraisal states the current issues concerning alterations and extensions as excessive scale, massing or height and inappropriate design of extensions, use of inappropriate materials and inappropriately detailed windows and doors, inappropriate roof level extensions (particularly where these interrupt the consistency of a uniform terrace or prevaillingly prominent in the streets) and loss of original details of traditional shopfronts.

Mansard Roof Extension

The application proposes a mansard extension above the existing building which would be set behind the parapet with a traditional design.

The former application ref: 2013/0833/P was refused on the grounds of the mansard extension and this was raised as an issue in the pre-application scheme ref: 2014/6494/PRE. In both cases the principle of the mansard extension was not accepted as the site is part of group of buildings have a strong parapet line and a roof line that is largely unimpaired by alterations or extensions.

It is acknowledged that the mansard extension in this application has an amended design including reduced depth and more traditional features.

The Council's CPG1 design guidance states that additional storeys and roof alterations are likely to be acceptable where there is an established form of roof addition or alteration to terrace or group of buildings and where continuing the pattern of development would help to reunite a group of buildings. CPG 1 goes onto state that a roof extension or addition is likely to be unacceptable where terraces or groups of buildings have a roofline which is largely unimpaired by alterations or extensions.

The site forms a part of the terrace at 11-17 Grenville Street and links with the adjoining terrace on Guildford Street which are a group of buildings which a strong parapet line and a roofline which is largely unimpaired by alterations or extensions. The adjacent building at Downing Court which is a higher building which forms a bookend at the junction with Bernard Street

The proposed mansard roof extension would unbalance the architectural composition of this group of buildings and would have an adverse effect on the roofscape of the building and terrace contrary to the Council's CPG1 guidance and the Bloomsbury Conservation Area Appraisal.

Overall, the mansard extension, by reason of its height, bulk and massing, would be an incongruous, overbearing and dominant addition to the local townscape which would fail to respond to the local scale, form and grain of development characteristic of the area, to the detriment of the character and appearance of the Conservation Area and wider streetscape contrary to policies CS14, DP24 and DP25.

This is consistent with the reason for refusal in the 2013 planning application and the previous pre-application advice.

Rear Infill Extension and Mews Dwelling

The Council's planning guidance in CPG1 states that rear extensions should be secondary to the building being extended, in terms of location, form, scale, proportions, dimensions and detailing; should respect and preserve the original design and proportions of the building, including its architectural period and style and should respect and preserve the historic pattern and established townscape of the surrounding area. CPG 1 guidance also states that rear extensions that are higher than one full storey below roof eaves/parapet level, or that rise above the general height of

neighbouring projections and nearby extensions, will be strongly discouraged.

The proposed infill extension would be located at 1st to 3rd floor level at the rear above the Colonnade access. This extension has been reduced in depth compared to the previous refusal/pre-application schemes. This extension would not be subordinate to the existing building as it would extend up to eaves level contrary to CPG1 guidance. The extension would also involve the removal of windows on the rear and side/rear elevations which are original architectural features. However, it is acknowledged that this extension would now respect the original design and layout of the building and would also not be highly visible due to its highly enclosed location inside the rear wings of the existing building. On balance therefore, the infill extension would be supported.

The proposed mews house would be a two storey building with basement located to the rear of the main building on the site of the existing single storey rear extension. The layout and scale of this building together with elements of its design and materials would reflect the character of the main building and adjacent mews. However, important elements of the design contrive to neither reflect the main building or adjacent mews including the depth of the overhanging first floor, the vertically proportioned windows and design of the ground floor mews doors. Overall, the proposed mews extension by reason of its detailed design would not be in keeping with the character and appearance of the building and the wider conservation area contrary to policies CS14, DP24 and DP25.

Other Alterations

The proposed timber entrance doorway, traditional shopfront and window alterations would be suitable alterations for this building which would accord with the Council's CPG1 policy guidance and would preserve or enhance the character of the conservation area.

Basement Extension

The development includes a basement extension. The site is located in an area designated for underground groundwater flow and slope stability constraints. In accordance with policy DP27 The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability. In particular the Council requires developers to demonstrate that the basement development would, maintain the structural stability of the building and neighbouring properties; avoid adversely affecting drainage and run-off or causing other damage to the water environment and avoid cumulative impacts upon structural stability or the water environment in the local area. A Basement Impact Assessment (BIA) was submitted with this application in accordance with the requirements of policy DP27 and CPG 4. In accordance with the Council's procedures this was independently assessed by external engineers.

The site has an existing basement under no. 11 Grenville Street. The development would extend the basement to the rear below a proposed two storey mews dwelling. The depth of the basement would increase by 0.7 m.

The independently assessment concludes that additional information is required including the author's qualifications, outline calculations to validate, floor slab, retaining walls and underpinning, the ground movement assessment is to be clarified and revised in accordance with C580 methodology and the proximity to the northern line tunnels is to be clarified.

It is therefore considered that insufficient information has been submitted in relation to the impacts of the proposed basement to allow the Local Planning Authority to ascertain whether the basement development would, maintain the structural stability of the building and neighbouring properties and avoid adversely affecting drainage and run-off or causing other damage to the water environment, contrary to policy DP27 and CPG4.

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.

The proposed two storey mews dwelling would replace the existing single storey rear extension. This building would project approx. 5.7 m beyond the rear elevation of the adjacent block of flats at Downing Court with a height of 5.3 m. Downing Court contains rear windows to residential flats from ground floor level and above. The proposed two storey mews would also be located to the south west of these windows. The 2013 application proposed a single storey building in this part of the site and therefore did not result in an amenity impact

The proposed two storey mews dwelling would result in some loss of daylight and sunlight to the ground floor windows at Downing Court. However, this would not be significantly above BRE standards and the impact is therefore considered to be acceptable.

Housing Standards

The proposed housing mix of 3x1 beds; 3x2 beds is considered to be appropriate in accordance with policy DP5.

The development would provide 6 residential units (Unit 1 2 bed 96 sq. m, Unit 2 2 bed 93 sq. m, Unit 3 1 bed 51 sq. m, Unit 4 1 bed 52 sq.m, Unit 5: 2 bed 93 sq. m and Unit 6: 1 bed 50 sq.m). All of the proposed residential units would provide adequate internal living space against the national space standards.

However, the proposed habitable space in the basement of the two storey mews house (unit 1) would not have windows or lightwells and would not receive any natural light contrary to CPG 2 guidance. This unit would also have a poor outlook directly facing the adjacent refuse and cycle storage area. In addition the proposed unit within the mansard roofspace (unit 6) would have a maximum floor to ceiling height of 2 m contrary to CPG 2 guidance which requires a minimum headroom of 2.3 m over at least half of the room. It is therefore considered that units 1 and 6 would provide an inadequate standard of residential development and would provide poor living conditions for future occupiers, contrary to the Council's housing standards guidance in CPG2 (The floor to ceiling height was 2.4 m in the previously refused scheme; a reduction in the height of the mansard has therefore been achieved by compromising living conditions in the scheme).

Transport and Highways impacts

Car parking

Policies CS11 and DP17 seek to encourage sustainable modes of transport in Camden and DP18 addresses the supply of car parking in the borough to reduce congestion and promote the use of more sustainable modes. The application site benefits from a high connectivity to public transport with a PTAL rating of 6b (excellent public transport accessibility) therefore it is suitable for a car free development in accordance with policy DP18. Given the parking stress and the highly accessible location of the site the proposed residential units should be made car-free through a Section 106 legal agreement. As the development would be refused on other grounds and therefore no legal agreement would be in place, this would form a reason for refusal on the scheme.

Cycle parking

DP18 requires development to sufficiently provide for the needs of cyclists. The Council is presently applying the most up-to-date cycle parking standards as set out in the London Plan (2016). The development would provide 6 cycle parking spaces which would be below the minimum standard of 9 spaces for this development in accordance with the London Plan standards. The application was also not submitted with a detailed design of the cycle parking area.

Obstructing the Highway

The external doors to the cycle and refuse store would open out onto the footway on the section of Colonnade which is particularly narrow. The door to the cycle store opens outwards as far as the carriageway. This would be contrary to policy DP21 as it would hinder safe pedestrian movement along the mews, and could force pedestrians onto the carriageway.

Construction Management Plan

The development proposes substantial construction project involving a basement extension, roof extensions, rear extensions and a significant amount of internal demolition. These works would have an impact on the local area and highway network due to construction vehicle movements and noise and disturbance. This is of concern as the site is located in a highly constrained area. In accordance with the requirements of policies DP20, DP21, DP26 and CPG 6 these construction impacts need to be mitigated through a Construction Management Plan (CMP) and an associated financial contribution would be required to the Council to monitor the implementation of the CMP.

A Construction Management Plan (CMP) has been submitted with this application. However, this would need to be secured by a S106 agreement, as many of the associated construction impacts would be generated by the movement of materials to and from the site and any associated temporary closure of the adjacent highway which relate to off-site matters. As the development would be refused on other grounds and therefore no legal agreement would be in place, this would form a reason for refusal on the scheme.

Highways Contribution

The construction of the development would impact on the public highway. Policy DP21 and CPG 7 require works affecting highways to repair any construction damage to transport infrastructure. In accordance with policy DP21 and CPG 7 the Council normally secure a section 106 financial contribution to undertake highway works to repair damage to highways caused by a development. As the development would be refused on other grounds and therefore no legal agreement would be in place, this would form a reason for refusal on the scheme.

Basement Works Approval in Principle

The development proposes a basement in close proximity to the public highway. It is necessary for the Council to ensure that the stability of the public highway adjacent to the site is not compromised by the proposed basement excavations.

The applicant would be required to submit an 'Approval In Principle' (AIP) report to the Council which would include structural details and calculations to demonstrate that the proposed development would not affect the stability of the public highway adjacent to the site together with details of any required mitigation measures. This would need to be secured as section 106 planning obligations together with an associated financial contribution towards the review and monitoring of the process. As the development would be refused on other grounds and therefore no legal agreement would be in place, this would form a reason for refusal on the scheme.

Sustainability

The development needs to incorporate sustainable design and construction measures in accordance with policy DP22 and London Plan Policy 5.2. Development is expected to follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies to achieve the fullest contribution to CO2 reduction. Policy CS13 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies. The development would also need to meet BREEAM Domestic Refurbishment 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

The application has been submitted with an energy and sustainability statement which demonstrate a 70.5% reduction in CO2 beyond existing building baseline and BREEAM Excellent

These sustainability measures would be secured through a S106 agreement including a Sustainability Plan clause requiring the stated BREEAM compliance and Energy Efficiency/Renewable Energy plan requiring the stated carbon reduction. As the development would be refused on other grounds and therefore no legal agreement would be in place, this would form a reason for refusal on the scheme.

Conclusion

Overall, the development has not addressed all of the issues raised in the previous refusal of pre-application advice and is therefore recommended for refusal. The issues are summarised below:

1. The development would result in the loss of the existing office accommodation without adequate marketing justification contrary to policies CS8 and DP13 and CPG5.
2. The proposed mansard would unbalance this building and terrace which have a roofline which is largely unimpaired by alterations or extensions and would therefore be an incongruous, overbearing and dominant addition to the building to the detriment of the character and appearance of the building, terrace and wider Conservation Area contrary to policies CS14, DP24 and DP25, CPG1 and the Bloomsbury Conservation Area Appraisal.
3. The proposed mews extension by reason of its detailed design would not be in keeping with the character and appearance of the building and the wider conservation area contrary to policies CS14, DP24 and DP25, CPG1 and the Bloomsbury Conservation Area Appraisal.
4. There is insufficient information regarding the basement to ascertain whether the basement development would, maintain the structural stability of the building and neighbouring properties and avoid adversely affecting drainage and run-off or causing other damage to the water environment, contrary to policy CS5, DP27 and CPG4.
5. The development by reason of inadequate outlook and light for the mews dwelling and inadequate floor to ceiling height for the top floor flat would provide an inadequate standard of residential development which would result in poor living conditions for future occupiers contrary to policy DP26 and CPG2.
6. In the absence of a legal agreement to secure car free housing in this highly accessible Central London location, the development would fail to encourage car free lifestyles, promote sustainable ways of travelling, help to reduce the impact of traffic and would increase the demand for on-street parking in the CPZ contrary to policies CS11, CS19, DP18, DP19 and CPG7.
7. The development would fail to provide adequate cycle parking facilities and would therefore provide substandard housing development, and would fail to promote cycling as a healthy and sustainable way of travelling in this highly accessible Central London location, contrary to policies CS11, DP17, DP18 and CPG7.
8. The development by reason of the outward opening design of the refuse and cycle storage doors would impact on pedestrian and highway safety on the Colonnade Mews contrary to policies, CS11, DP21 and CPG7.
- 9 In the absence of a legal agreement to secure the implementation of the Construction Management Plan and associated financial contribution, the development would contribute unacceptably to traffic

disruption and dangerous situations for pedestrians and other road users and be detrimental to the amenities of the area contrary to policies CS5, CS11, CS19, DP16, DP20, DP26, DP28, DP32, CPG4 and CPG7.

10. In the absence of a legal agreement to secure the necessary financial contributions to undertake public highway works, the development would harm the Borough's transport infrastructure contrary to policies CS11, CS19, DP16, DP17, DP21 and CPG7

11. In the absence of a legal agreement to secure the Approval in Principle report and associated financial contribution, the development may result in harm to the stability of the adjacent public highway to the detriment of highway safety contrary to policies CS11, CS19, DP21 and CPG7.

12. In the absence of a legal agreement to secure the Sustainability Plan and Energy Efficiency/Renewable Energy plan the development would not incorporate the necessary sustainable design and construction measures including the stated CO2 reduction and BREEAM Excellent, contrary to policies CS13, CS19, DP22, and London Plan Policy 5.2.