



PLANNING, DESIGN AND ACCESS STATEMENT

**36-37 GREAT RUSSELL STREET WC1B 3PP | April 2017**

*On behalf of Desilu Grou*

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## 1.0 Introduction

1.1 This Planning Statement (the 'Statement') is prepared by SF Planning Limited on behalf of Desilu Group, to support a planning application regarding the proposed alterations and extensions to nos. 36-37 Great Russell Street, Camden.

1.2 The works include rear extensions to facilitate providing 3no. flats on the upper floors of the building (retaining the 1<sup>st</sup> and 2<sup>nd</sup> floor office space), alterations at roof level to provide a new terrace and enlarged basement and ground floor retail space (which has already been approved previously under reference 2016/2795/P).

1.3 The applicant's description of proposed development is set out below;

*"Alterations and extensions to the existing building to provide enlarged retail space at basement and ground floor, 3 flats (2x1 and 1 x 2 bed) at part first, part second and third floor, roof terraces and associated works."*

1.4 Nos. 36 and 37 are located on the south side of the Great Russell Street, close to the junction with Bloomsbury Street and to the south of the British Museum.

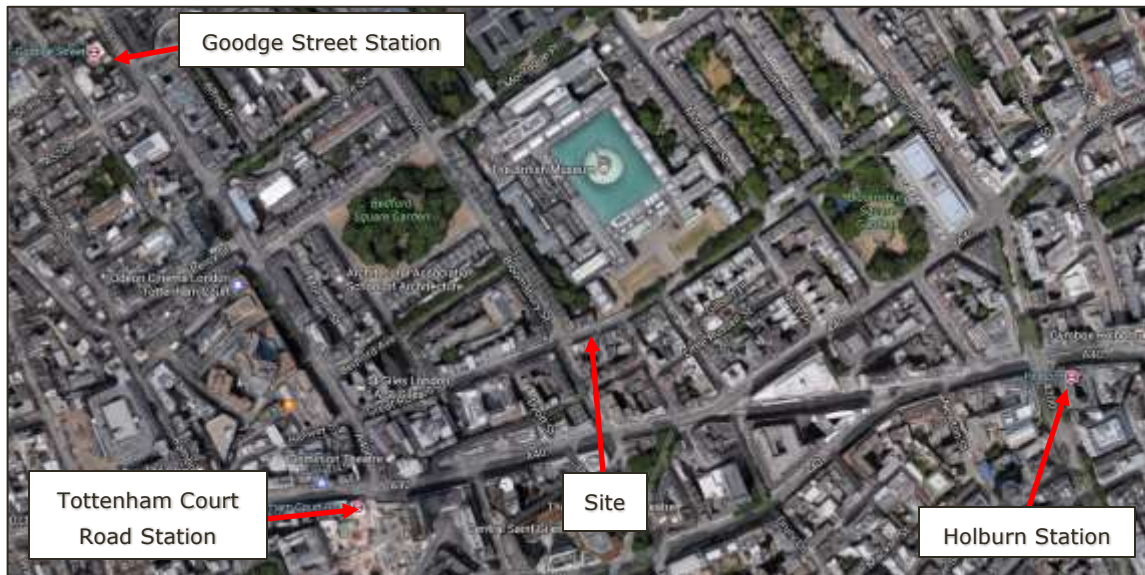


Site Location Plan

- 1.5 This Statement considers the application site, its context, relevant planning history and pre-application discussions with the London Borough of Camden in relation to the proposals.
- 1.6 The scheme is considered against relevant local and national level planning policy, which generally supports housing delivery in appropriate and sustainable locations.
- 1.7 The Statement then goes on to fully justify the proposals in planning terms and highlights the key benefits of the proposals which will provide much needed additional housing within the Borough to support a significant housing shortfall within London, whilst enhancing the retail unit on the lower floors and retaining the first and second floor office space.
- 1.8 The Statement should be considered alongside the architectural drawings submitted with the scheme, produced by PAPA Architects.

## 2.0 The Site

- 2.1 The site is located in an area of mixed character with the property itself on the south side of the Great Russell Street, close to the junction with Bloomsbury Street and to the south of the British Museum. The site is in close proximity to three London Underground Stations including Goodge Street, Tottenham Court Road and Holborn.



*Aerial photograph of site & context*

- 2.2 Nos. 36 and 37 Great Russell Street are buildings of five floors, currently containing a retail use at ground floor level (with associated storage in the basement), offices at first and second floor levels, and two residential flats at third floor level, which currently do not meet London Plan internal space standards.



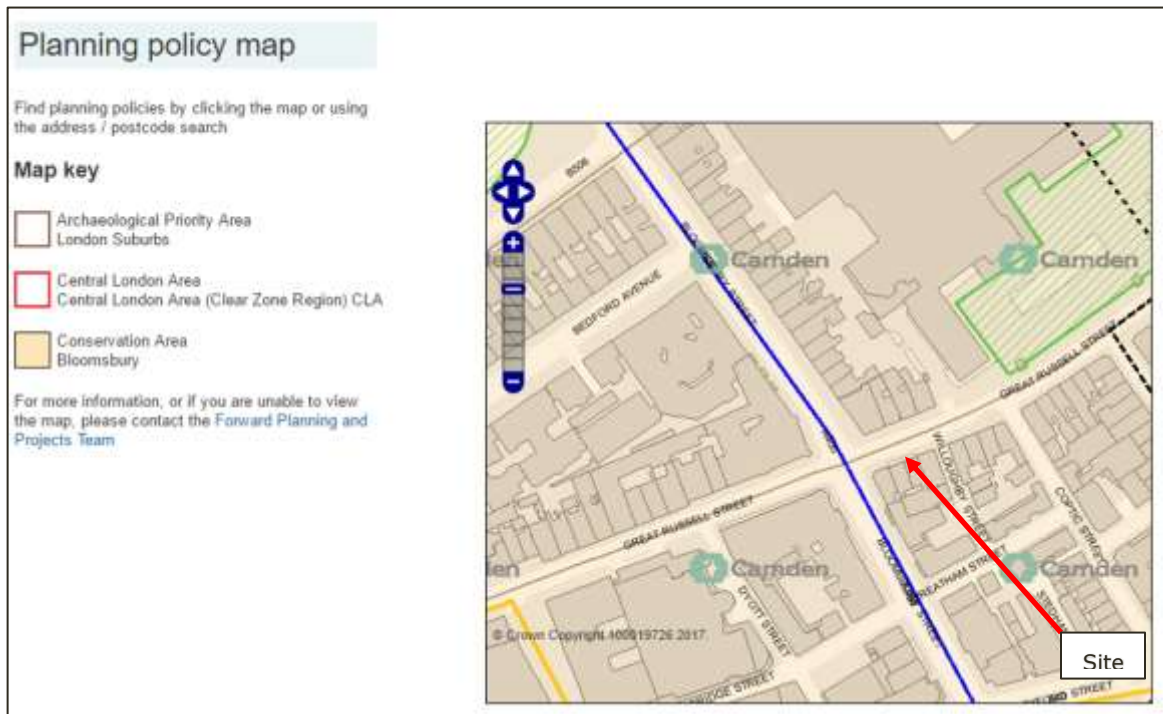
*Photograph of the site from Great Russell Street / Bloomsbury Street junction*



*Aerial photograph of site & context*

- 2.3 There are a variety of uses within the vicinity of the site including retail units at ground floor level, commercial and residential largely on the upper floors of buildings and cultural uses in close proximity.

- 2.4 In terms of planning designations, the site is located the Bloomsbury Conservation Area and an Archaeological Priority Area as well as being within the London Plan Central Activities Zone (CAZ) as set out on the Council’s Proposals Map.



Camden’s Local Plan Proposals Map

- 2.5 The site has a very high public transport accessibility level (PTAL) of 6b with many London Underground Stations in close proximity and is within Flood Zone 1 (low risk).

## 3.0 Planning History & Pre-Application Discussion

- 3.1 The planning history in relation to this site is provided within the table below, with a recently approved scheme in 2016 for alterations and extensions to the basement and ground floor retail unit, which has also been incorporated into these proposals, since it has not yet been implemented.

Reference	Description	Decision
N14/26/5/79590/NW	<i>The use, for a limited period, of the third floor of No. 36 for office purposes</i>	Granted 09/11/1956
TP/79590/NW	<i>The continued use for a limited period only of the third floor at No. 36 Great Russell Street, Holborn for office purposes</i>	Granted 02/01/1961
TP79590/02/12/60	<i>continued use for a limited period only of the third floor at No.36,Great Russell Street, Holborn for office purposes</i>	Granted 02/01/1961
N14/26/5/31223	<i>Continued use of the third floor as offices</i>	Granted 13/11/1980
85/00706	<i>Continued use of the third floor as offices</i>	Granted 03/07/1985
2016/2795/P	<i>Infill extension at basement and ground floor level to the rear (Use Class A1).</i>	Granted 23/08/2016

- 3.2 Pre-application discussions were held with Ian Gracie (Senior Planning Officer) prior to the submission of the application in March 2016.
- 3.3 The advice confirmed the principle of the development was acceptable since housing is regarded as the priority land-use of the Local Development Framework and the Council will make housing its top priority when considering the future of unused and underused land and buildings.



- 3.4 The advice went on to confirm the proposal, which would provide new residential units (2x1-bedroom and 1x2-bedroom) would be compliant with policies CS6 and DP2.
- 3.5 In relation to the massing of the proposed extensions, these were generally considered to be acceptable, subject to slight amendments to the scheme involving reducing the envelope of the scheme including its width and alterations to the fenestration of the proposed extensions.
- 3.6 Additional evidence was also requested to be submitted as part of the application in relation to the lawful residential use of the 3<sup>rd</sup> floor of the property which is discussed in more detail in section 5 of this Statement.
- 3.7 As it will be demonstrated and justified within section 5 of this Statement along with the various accompanying drawings, the scheme has been further refined and amended to ensure the proposals respond to the comments received at pre-application stage.
- 3.8 The development of the site should be considered wholly appropriate to its context and this Statement and accompanying drawings from PAPA Architects provide a robust justification for the proposals.

## 4.0 Relevant Planning Policy

- 4.1 The development of the site is proposed in the context of national, regional and local housing and design objectives as set out in the National Planning Policy Framework (NPPF) (March 2012), The London Plan (Further Alterations - 2015) as well the London Borough of Camden's Core Development Strategy and Development Plan Policies adopted November 2010.
- 4.2 The adopted Development Plan is accompanied by the Camden Planning Guidance (CPG) which was adopted April 2011 and partly revised since in 2013 and 2015.
- 4.3 In general, both local and national planning policy seek to provide new housing in sustainable locations and achieve high quality designed schemes.

### ***National Planning Policy Framework (NPPF - 2012)***

- 4.4 At the heart of the policy objectives is to seek to achieve sustainable development, with the planning system required to perform economic, social and environmental roles (NPPF Paragraphs 6 and 7) whilst setting out Central Government's overarching, national strategic planning objectives, which is a presumption in favour of sustainable development:

*"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking. For decision making this means: approving development proposals that accord with the development plan without delay." [Applicants Emphasis] (NPPF, para. 14)*

- 4.5 Paragraph 17 of the NPPF is committed to promoting sustainable development by maximising the re-use of previously developed and under-utilised land on sites within urban areas (such as this site) which are well served by public transport, providing that a good living environment is maintained and the land is not of a high environmental value.
- 4.6 The NPPF also looks to "boost significantly the supply of housing" (paragraph 47), and in that respect, paragraph 49 explains that "Housing applications should be considered in the context of the presumption in favour of sustainable development".

- 4.7 The importance of windfall sites (such as this) and future housing supply from the re-use of previously developed land is central to the policy guidance and supports the basis of the application scheme (NPPF, para 48).
- 4.8 Paragraphs 17 and 111 of the NPPF makes it clear Local Authorities in policy and decision making should “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.”
- 4.9 Paragraphs 23 is also relevant and recognises that within town centre locations such as this, residential development can play an important role in ensuring the vitality of centres is maintained and enhanced and sets out policies to encourage residential development on appropriate sites.
- 4.10 At a national level, there is therefore clear support for this application which would re-use existing and underutilised parts of the building (which currently offer flats at 3<sup>rd</sup> floor level which do not meet the minimum internal space standards set out in the London Plan) and wider site, to deliver much needed housing with retained and enhance commercial uses within this sustainable location.
- 4.11 In terms of seeking good design, the NPPF states that:
- “The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, it is invisible from good planning, and should contribute positively to making places better for people.”* (NPPF, para 56)
- “It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings.”* (NPPF, para 57)
- 4.12 The design of the proposed scheme, which has been amended following the pre-application advice received, has been considered in depth in the context of the prevailing character of the site as well as the scale and design detailing of the existing building.

- 4.13 The resultant scheme is one of a high quality nature which responds to and respects local character of buildings within the vicinity, extending into an area of the site which is enclosed on three sides and ensuring compliance with the design aspirations of the NPPF.

***London Plan – Further Alterations (2015)***

- 4.14 The London Plan is the overall Strategic Plan for London, setting out an integrated economic, environmental, transport and social framework for development up to 2036.
- 4.15 The Mayor published the Further Alterations to the London Plan (FALP) as formal alterations to the London Plan on the 10<sup>th</sup> March 2015. These were prepared primarily to address key housing and employment issues emerging from an analysis of census data released since the publication of the latest revisions to the London Plan in July 2012, which indicate a substantial increase in the capital's population.
- 4.16 The FALP has amended London Plan Table 3.1, which stipulates the annual monitoring target for housing completions across London as a whole.
- 4.17 The target for London from 2011 to 2021 has been increased from 32,210 dwellings to 42,389 dwellings, and of these, it is expected that 889 dwellings are provided annually within the Borough of Camden.
- 4.18 The FALP additionally places greater emphasis on the need to '*supplement*' rather than '*meet*' these targets (Ref. Policy 3.3 E), with LDF housing targets to include extra housing capacity to close gaps between identified housing need and supply. The scheme would contribute additional housing to boost housing supply within the borough.
- 4.19 There is a clear and identified need to boost housing supply within the wider London region and the proposed scheme would help contribute much needed housing within this highly sustainable location, whilst providing better quality units than those that exist already at 3<sup>rd</sup> floor level.
- 4.20 Policy 3.11 of the London Plan relates to affordable housing targets, requiring affordable housing of sites of 10 or more units and therefore is not applicable in this case.

- 4.21 Policy 3.5 endorses a range of minimum unit sizes for new residential development in London, with details set out at Table 3.3, which all the units have been designed to meet.
- 4.22 Policy 7.6B relates to good design, stating that architecture should make a positive contribution and incorporate high quality materials and overall design. Buildings and structures should:
- *Be of the highest architectural quality;*
  - *Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;*
  - *Comprise details and materials that complement, not necessarily replicate, the local architectural character;*
  - *Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate;*
  - *Provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;*
  - *Be adaptable to different activities and land uses;*
  - *Meet the principles of inclusive design; and*
  - *Optimise the potential of sites.*
- 4.23 The application proposals have been considered in the context of policies which seek to promote housing delivery and high quality design, whilst protecting the amenity of neighbouring residents.
- 4.24 As the submitted suite of documents demonstrate, the proposed additional residential units within the proposed extensions are wholly compatible with the site location, which includes a significant proportion of residential properties on the upper floors of neighbouring buildings.

***Camden's Core Strategy & Development Management Policies (2010)***

- 4.25 Core Strategy Policy CS1 (Distribution of growth) promotes efficient use of land and buildings in Camden and supports growth in accessible locations such as this site which has been demonstrated to be sustainably located.
- 4.26 The Council's position with regards to the provision of housing is set out in Policies CS6 (Providing quality homes) and DP2 (Making full use of Camden's capacity for housing) whereby the Council seeks to maximise the supply of additional homes in the borough.

- 4.27 Great Russell Street is part of a mixed-use area. The majority of the buildings in the area have retail / town centre use at ground floor, whilst the upper floors are in commercial or residential use. Given the existing situation and adjacent residential properties the principle of the development should be considered wholly acceptable.
- 4.28 In this case, the sustainably located, previously developed site, in close proximity to good public transport links and other services is considered to be entirely appropriate for this small scale residential development on a site which already contains flats.
- 4.29 Camden's residential development standards are set out in Policy CS6 – Providing quality homes and Chapter 4 of CPG2 - Housing. All residential developments in the borough are required to be designed and built to create high quality homes and these proposals have been designed to comply with the relevant standards.
- 4.30 Policy DP5 seeks to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table. The table identifies 2-bedroom market units as being very high priority and the scheme includes a two bed flat to meet this identified need.
- 4.31 In relation to design, Policy CS14, seeks to ensure that development respects local character and context and preserves and enhances the boroughs rich character. Policy DP24 requires all development, to be of the highest standard of design and considers the setting, character, and form of the building.
- 4.32 In terms of amenity, Policy DP26 relates to managing the impact of development on occupiers and neighbours of the Camden Development Policies outlines how the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity.
- 4.33 The policy sets out development should be designed to protect the privacy of both new and existing dwellings to a reasonable degree. The degree of overlooking depends on the distance and the horizontal and vertical angles of view. Therefore, new buildings, extensions, balconies and the location of new windows should be carefully designed to avoid overlooking.
- 4.34 In line with Development Policy DP18 - Parking Standards and Limiting the Availability of Car Parking, the development is proposed to be car-free i.e. the future occupants will be unable to obtain parking permits from the Council.

- 4.35 This will be achieved via a s106 legal agreement and draft "Heads of Terms" have been supplied later within this Statement.

## 5.0 Planning Justification

### ***Principle of Development***

#### *- Residential*

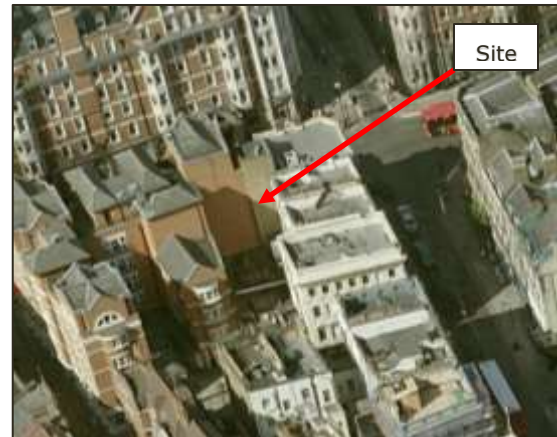
- 5.1 The housing shortfall in London and the rest of the UK is widely acknowledged. The NPPF and London Borough of Camden's Development Plan support the provision of residential accommodation in appropriate locations. Paragraph 49 of the NPPF is relevant and a primary objective of national planning policy is to require housing applications to be considered in the context of the presumption in favour of sustainable development.
- 5.2 Paragraphs 23 of the NPPF also makes it clear in town centre locations such as this, residential development can play an important role in ensuring the vitality of centres.
- 5.3 At a national level, there is therefore clear support for this application which would reuse existing and underutilised parts of the site in a sustainable town centre location to deliver much needed housing.
- 5.4 Mayor published the Further Alterations to the London Plan (FALP) as formal alterations to the London Plan on the 10th March 2015. The FALP additionally places greater emphasis on the need to 'supplement' rather than 'meet' these targets (Ref. Policy 3.3 E), with LDF housing targets to include extra housing capacity to close gaps between identified housing need and supply. The scheme would contribute additional housing to boost housing supply within the borough.
- 5.5 At a local level, Development Plan Policy DP2 relates to making full use of Camden's capacity for housing, with the Council seeking to maximise the supply of additional homes in the borough by expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant, such as this site.
- 5.6 In terms of the lawful use of the third floor, whilst it is acknowledged the third floor has planning history which indicates permissions for temporary office use, these applications date back to the 1980s and were of temporary nature. No new applications for temporary office use have been made or permitted since the 1980s.



- 5.7 A review of the Valuation Office Ratings Records for the building (Appendix 1) indicates the 3<sup>rd</sup> floor of the building is not rated for business purposes (the basement to 2<sup>nd</sup> floors of the building are rated as retail / office).
- 5.8 Council Tax records (Appendix 2) prove the third floor of the application site has been in residential use since at least 1995 (presumably reverting back to residential use by default following the temporary office permission in the 1980s). This is consistent with the planning history which indicates the temporary applications for office use of the upper ceased in the 1980s and the fact the upper floors aren't rated for business purposes.
- 5.9 There is a clear and identified need to boost housing supply within the wider London region and the proposed scheme would help contribute much needed housing within this highly sustainable location, whilst providing better quality units than those that currently exist on the third floors of the building.
- 5.10 The principle of additional residential units on this site should be supported as the residential use would be in character with the prevailing residential context of the area. The scheme is therefore considered to be a wholly appropriate and would maximize this underutilised site representing a "windfall" site to boost housing supply.
- *Retail*
- 5.11 The basement and ground floor of the property have a lawful retail use which would be enhanced as part of the proposals. In addition, the enlarged basement and ground floor retail space has already been approved previously under reference 2016/2795/P and therefore the works in this regard should be considered entirely acceptable.

### ***Design***

- 5.12 The proposals are accompanied by a comprehensive set of existing and proposed drawings from PAPA Architects which outline the proposed design and complementary materials in the context of the areas prevailing mixed character.
- 5.13 The rear of the existing site is enclosed on three sides and is largely not visible from the public realm with limited views of the area from the upper floors of adjoining buildings.



Rear of application site from Willoughby Street (left) and aerial photograph (right)



Rear of application site from main building

- 5.14 These proposals would enhance the appearance of the rear of the building through the additional of windows and a fenestration pattern within the proposed extensions to add visual interest and natural surveillance, rather than the high blank party walls on two sides.
- 5.15 The scheme has been amended and refined following the pre-application advice provided by the Council and the proposed new units and extensions reflect the style of the host building and has been reduced in envelope to ensure the appearance of the scheme is in keeping with the building.
- 5.16 The development proposed the appropriate use of high quality and durable materials to match the palette in the vicinity of the site to ensure the scheme enhances the appearance of the building overall when compared to the existing elevational treatment.

- 5.17 It is considered therefore, that the scheme represents an entirely appropriate form of development in this area, with the use of good quality materials and the proposed extensions are of a scale which wholly respects the scale and appearance of neighbouring buildings and wider street scene.
- 5.18 The design of the scheme is considered to accord with the key principles of NPPF, the London Plan as well as policies CS14 and DP24 of the development plan.

### ***Amount***

- 5.19 The proposed residential extensions would provide 3no. flats, within the building (an additional one in total since the 3<sup>rd</sup> floor already contains 2 x small and substandard flats). The scheme would enhance the basement and ground floor retail unit and retail the first and second floor offices to provide a mixed use building to compliment the character of the area.
- 5.20 The amount of development, contained within the extensions has been designed to complement the host building and reflect the areas character.
- 5.21 The scheme is considered to be commensurate and complementary to the pattern of development within the vicinity, which is mixed, and includes flats on the upper floors of adjoining development.
- 5.22 There is a clear rationale to the proposed design approach and relationship to adjoining development, to ensure the amount of development proposed is compatible within its surroundings in accordance with the principles set out in policies CS14 and DP24 of the development plan.

### ***Layout***

- 5.23 PAPA Architects have prepared drawings to fully illustrate the layout proposals for the new units. The proposed extension would complement the layout of the uses within the building, with separate access cores provided for the residential and commercial uses.
- 5.24 The proposed development has been designed to provide dual aspect units where possible, with no single aspect north facing units and access to outdoor amenity space where possible, to ensure the scheme would provide a good standard of accommodation.
- 5.25 The layout and form of the scheme would ensure the amenities of neighbouring residents would be protected, since the site is flanked by high blank walls on two

sides. In addition the proposed roof terraces would be provided with appropriate screening to ensure the scheme is in accordance with policy DP26 of the development plan.

### ***Mix of units***

- 5.26 The scheme would deliver a mix of smaller units, including a much needed two bedroom flat, which are appropriate to this location.
- 5.27 The proposals would replace the existing substandard flats at third floor level, which do not meet internal minimum standards for accommodation as set out in the London plan.
- 5.28 Due to the configuration of the rear extensions, it has not been possible to provide more 2no. bed units. However, in any case the proposals provide a good mix of smaller units which help optimize the potential of the site and ensure a viable and deliverable scheme.

### ***Unit Size***

- 5.29 The scheme would provide 3no units (replacing 2no units which do not meet minimum internal space standards). The new units have been designed to meet the space standards set out in the London Plan and national space standards to ensure the new residential units offer a good standard of accommodation to future occupiers.

### ***Accessibility, Parking & Servicing***

- 5.30 The site is located within a highly sustainable location with excellent access to public transport facilities (PTAL 6a), including three London Underground Stations in close proximity (Goodge Street, Tottenham Court Road and Holborn) as well as numerous bus routes.
- 5.31 The development (which would result in the net increase of one residential property within the building) is therefore proposed to be "car free" with a restriction of future residents applying for parking permits, which can be secured via s106 legal agreement.

### ***Access***

- 5.32 Access to the site and the residential units on the upper floors from the street would be improved with one central residential core served by a lift.

## 6.0 S106 Heads of Terms

- 6.1 On 6th April 2010 the Community Infrastructure Levy (CIL) Regulations came into force which made it unlawful for a planning obligation to be taken into account as a reason for granting planning permission for a development, or any part of a development, whether these is a local CIL in operation or not; if the obligation does not meet all the following tests set out in Regulation 122(2):
- (i) necessary to make the development acceptable in planning terms;
  - (i) directly related to the development;
  - (ii) fairly and reasonably related in scale and kind to the development.
- 6.2 The application would attract Mayoral and Camden's CIL payment, to contribute to local infrastructure as set out in the relevant Mayoral CIL schedule and Camden's Local CIL schedule, based on the final net increase in floorspace of development on site.
- 6.3 Following the grant of any planning permission, the applicant will provide and seek to agree the finalised GIA of the proposed scheme with the Council's CIL Officer to confirm the final Mayoral and Camden's CIL payment applicable for this application scheme.
- 6.4 Subject to viability negotiations during the application process and the relevant tests of the CIL Regulations and paragraph 204 of the NPPF the applicant is agreeable to the following "Heads of Terms" for any required s106 agreement;
- Car-free housing
- 6.5 These and any other matters will be subject to negotiation and agreement during the course of the planning application.

## 7.0 Conclusion

- 7.1 In conclusion, it is considered that the application scheme fully accords with the latest national planning policy objectives within the NPPF, as well as those at a local level which support the delivery of housing and the proposed development will make efficient and positive use of an under-utilised site within the London Borough of Camden.
- 7.2 Given the prevailing residential context within the vicinity of the application site, the proposed residential units are considered to be acceptable in principle and the retention of the 1<sup>st</sup> and 2<sup>nd</sup> floor offices and upgrading of the ground floor and basement retail unit would provide a truly mixed use development.
- 7.3 The proposed form of the development, designed in a style to complement the existing building, would be consistent and complementary to the prevailing character and appearance of the area and in terms of height and scale.
- 7.4 Based upon the detailed technical design and planning assessment justification case presented in support of the scheme the applicant contends that the case in support of the redevelopment of this underutilised site is compelling and that Officers and Members should support the scheme.



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