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Via Email Only
FAO Gideon Whittingham

Dear Gideon

Planning Application – 64 Lincolns Inn Fields
Change of use of part of the basement to storage facility
2017/0870/INVALID & 2017/1496/INVALID

Further to our recent email exchanges, I now have pleasure in submitting the following information alongside this covering letter, which would supersede the above reference numbers.

- Revised application form
- Proposed basement plan
- Consented ground floor plan
- Section drawing of consented cycle storage
- Operational Management Plan

Proposal / Layout

The proposal is for the conversion of part of the basement vault area (64.3sqm) to an independent storage facility. The vault sits under the forecourt of the property at the front of the site, and is vacant. Also included as storage facility is a separate vault measuring 7.3sqm in size, meaning a total floorspace of 72sqm. The remaining space within the vault would be utilised by the cycle storage area, which was approved via condition (C5) under planning reference 2015/0989/P. Access to the vault is possible externally via a stairwell on one side of the lightwell, and internally via the main entrance lobby associated with the residential units on site. It should be noted that the sole access to the storage unit would be via the lightwell, and not through the main building. Plans are submitted with the application to illustrate the proposed layout.

Planning Policy

The Local Plan is due to be adopted on 26th June when it will replace the current LDF policies. The Inspector's report on the Local Plan was published on 15 May 2017 and concludes that the plan is

'sound' subject to modifications being made to the Plan. While the determination of planning applications should continue to be made in accordance with the existing development plan until formal adoption, substantial weight may now be attached to the relevant policies of the emerging plan as a material consideration following publication of the Inspector's report, subject to any relevant recommended modifications in the Inspector's report. Given the timing of this application, consideration is given to the Local Plan, and other local planning guidance as necessary.

Loss of Ancillary Residential Space

Given that application reference 2013/7434/P has been implemented, the entire use of the site is now lawfully within residential use. The vault area, and other areas around the site not providing residential units are therefore deemed as ancillary residential spaces. As noted above the vault will house the consented cycle storage, and the refuse storage has been approved within the forecourt at ground floor level, thus meaning that the normal supporting facilities for residential use have been met. The remaining 72sqm is therefore redundant, and highly unlikely to be able to provide residential living accommodation based on it being subterranean with no natural light source.

Policy H3 (Protecting existing homes) of the Local Plan, generally discourages the loss of residential floorspace, but is focused on such floorspace which provides 'homes'. As this space does not provide homes, and the loss of the ancillary space is not detrimental to the current/future occupiers of the residential units on site, attention is drawn to the subtext of the policy in Para 3.58 and 3.59, which deals with ancillary floorspace.

Para 3.58 provides examples of types of housing that Camden aim to protect including staff accommodation above a shop or pub, floorspace at nursing, care homes or hospitals where people live long term such as accommodation for nurses and for patients who are no longer able to live independently (including resident lounges, sleeping areas, bathrooms/ toilets, and associated circulation space).

Para 3.59 states that Camden will resist proposals that include: -

- reductions in floorspace that are material because they reduce the number of residents who can occupy a home or property; and
- proposals that would involve a permanent change of residential floorspace from long-term accommodation to visitor accommodation let for periods of less than 90 days.

The loss of part of the vault area to a storage facility, would not, like the examples above result in the loss of 'homes' or result in the loss of material floorspace that would reduce the number of residents who can occupy a home or property. As noted above the space is redundant, and unsuitable for habitable accommodation, whereas other areas within the site can suitably provide the required ancillary services that support residential use.

Delivery and location of growth / Mixed use development

Camden's overarching policy relates to the delivery and location of growth, and is contained with policy G1 of the Local Plan. The opening part of the policy states "*We will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden*".

In terms of how this is delivered, the policy goes on to say to say this will be achieved by: -

- a) supporting development that makes full use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;*
- b) resisting development that makes inefficient use of Camden's limited land;*
- c) expecting the provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the borough, including an element of self contained housing where possible; and / or*
- d) supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.*

The policy goes on to say that that Camden expect the most significant growth to be delivered through a concentration of development in the growth areas including the Central London area where the application site is located. Paras 2.8 - 2.11 promote '*making the most of our limited land*', and generally seek to most efficient use of Camden's Land and buildings, in the most accessible parts of the borough, such as the Central London Area. Para's 2.12 to 2.14 promote 'Mixed Use Developments', as this would contribute to future growth and making again making efficient use of its limited land. Policy E1 (Promoting a successful and inclusive Camden economy) supports new employment uses, and promotes opportunities for storage uses within the subtext 5.32 – 5.36.

In addition to the above policy support for mixed use development, there is also the character assessment of Lincoln's Inn to consider. The area is home to a mix of residential and commercial premises, a large majority of which support the legal industry, and it is common to find a mix of uses within buildings. Lincolns Inn and the Inns of Court areas are essentially characterised by such uses, and this is acknowledged in the Bloomsbury conservation area statement (Sub Area Nine).

The proposals fully accord with these strategic policy ambitions, and would undoubtedly make best and most efficient use of the available land in an area characterised and with policy support for mixed use development.

Operation of the storage facility / Residential amenity

The application is accompanied with a draft management plan, which aims to provide clarity and comfort on the operation of the storage facility and how this would work alongside residential uses. In terms of the layout there are two studio flats located on the frontage at lower ground floor level which front the lightwell, which is the applicant is particularly mindful. Given the relatively small size of the storage facility, it is likely this will be attracted to small items such i.e. files/paper storage and not large bulky items that require large delivery vehicles etc.

The company which will operate the premises has six outlets in/around London and have over 20 years of storage experience.

The following key measures are proposed to protect those interests, and those of the wider residential community: -

- No staff would be on site, unless a customer of the storage facility made a prior appointment only. At this point a staff member would meet the customer at the premises.
- Once appointment made use only operates between 9am – 7pm Weekdays and 10am -4pm Saturday and closed Sunday and bank/public holidays.
- No vehicles allowed on site at any time.

Further details are indicated in the management plan which appends this application.

Overview

Based on the above, the proposals to utilise the front vault as storage space accords with local and national policy and therefore planning permission should accordingly be granted.

If there are any questions, or required points of clarification please contact me as soon as possible.

Yours sincerely

Stuart Minty
Director
SM Planning