



**contour
planning**

**Planning & Heritage
Statement**

On Behalf of:
HILLOLIM MAYFAIR LTD

In Relation to:
**Resubmission of Planning
Application for change
of use from Offices to
Residential**

**10 Gate Street
London WC2**

July 2017

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1.0 Introduction

- 1.1 This statement is submitted on behalf of Hillolim Mayfair Limited in support of an application for Full Planning Permission for a mixed use residential and restaurant development at 10 Gate Street, which is a resubmission of a previously granted planning permission. The site is located within the Holborn and Covent Garden ward in the London Borough of Camden.
- 1.2 The application proposal involves:
- “RESUBMISSION OF APPLICATION REFERENCE 2013/4980/P FOR THE ERECTION OF A SEVEN STOREY REAR EXTENSION ON LITTLE TURNSTILE AND MANSARD ROOF EXTENSION IN ASSOCIATION WITH CHANGE OF USE OF OFFICE (B1A) AND RESTAURANT (A3) TO RESIDENTIAL 2 X 1 BEDROOM UNIT AND 2 X 2 BEDROOM UNIT (C3) AND FLEXIBLE A1/A3 USE AT LOWER GROUND AND GROUND FLOOR LEVEL.*”**
- 1.3 The proposed development follows the grant of planning permission, which is shortly to expire.
- 1.4 This statement has been prepared by Contour Planning Services Ltd and provides the planning case in support of the proposed development. It assesses the development in the context of planning policy and guidance at the national, regional and local levels.
- 1.5 This Planning Statement should be read in conjunction with the other assessments and information submitted in support of the application, which comprise:
- Design and Access Statement and Servicing Management Plan prepared by Lynas Architecture;
 - Office Market Report prepared by Strettons;
 - Noise Impact Assessment prepared by RBA; and
 - Construction Management Plan prepared by Lynas Architecture.
- 1.6 The following section of this Statement provides a detailed description of the proposal site and the surrounding area.

2.0 Site Context

- 2.1 The site is located in the Holborn and Covent Garden ward of the London Borough of Camden. The site is located at the northern end of Gate Street at the junction with Little Turnstile Street.
- 2.2 The Bloomsbury Conservation Area Appraisal and Management Strategy (2011) identifies the site as making a positive contribution to the conservation area and describes Gate Street and Little Turnstile Street as two narrow, highly enclosed streets leading from the north-west corner of Lincoln's Inn Fields which reflects the historic street pattern, and are defined by mainly nineteenth century commercial buildings.
- 2.3 The existing building is set out over seven storeys and is currently in restaurant use at basement, ground and first floor levels and office use on the upper floors. The existing office accommodation does not meet modern office standards and is not in a reasonable condition to allow the use to continue. The office accommodation is accessed from the rear of the site by an unsecured entrance which provides a poor office frontage. Internally the offices share a narrow staircase with the restaurant located on the lower levels of the building which presents a serious fire and security risk. The offices do not have any refuse storage facilities, cycle parking or showers. Furthermore, the office units do not have raised floors and there is no air conditioning or double glazing, which results in overheating in the summer and heat loss in the winter.
- 2.4 Pedestrian access to the restaurant is to the north of the site on Gate Street with access to the offices to the rear of the site on Little Turnstile Street.
- 2.5 The site lies within a highly accessible location, and has a Public Transport Accessibility Level (PTAL) rating of 6b, which is rated as 'Excellent', as calculated using the Transport for London (TfL) PTAL calculation methodology.
- 2.6 A number of London underground stations are located in close proximity to the site. London Underground services can be accessed from Holborn station to the west and Chancery Lane station to the south. Whilst Tottenham Court Road provides further London Underground services to the west.
- 2.7 There are a number of high frequency bus services surrounding the site, which can be accessed from Kingsway and High Holborn.

The Surrounding Area

- 2.8 The site is located in the Holborn and Covent Garden ward. The site location has been the focus of significant regeneration for mixed use residential and commercial development in recent years.
- 2.9 Immediately to the south west of the site fronting Southampton Row is Africa House, which comprises a grade II listed seven storey office building.
- 2.10 To the south east is Lincoln's Inn Fields, the largest public square in London, and home to numerous barristers' offices. More recently a number of the buildings surrounding Lincoln's Inn Fields have been converted to residential use.

- 2.11 To the north of the site is Little Turnstile Street which comprises predominantly retail uses in the form of a number of cafes and restaurants. Slightly further to the north is High Holborn which is predominantly commercial in character and comprises a busy thoroughfare when compared to the quieter streets of Gate Street and Little Turnstile Street.
- 2.12 The site is situated in 'Sub Area 9: Lincoln's Inn Fields/Inns of Court/High Holborn' of the Bloomsbury Conservation Area. The Bloomsbury Conservation Area Appraisal and Management Strategy describes the character of the sub area as being '*derived from the marked contrast and transition in scale and sense of enclosure experienced when moving through the interconnected spaces comprising landscaped squares, enclosed courtyards, and narrow passageways and lanes, many of which are vehicle free with a high volume of pedestrian activity.*'
- 2.13 The Design and Access Statement and Servicing Management Plan prepared by Lynas Architecture, submitted in support of this application, provides a thorough and detailed review of the local context to the application site.

Planning History

- 2.14 A search of the London Borough of Camden's records did not identify any relevant planning history for the site, with the exception of the original grant of planning permission for the proposed development.
- 2.15 As referred to above, planning permission was granted on 15 September 2014 under LPA reference Number 2013/4980/P (subject to a number of conditions and a legal agreement under S106).
- 2.16 The planning application as originally submitted proposed the change of use of the upper floors to 4 x 1 bed and 1x 2 bed. However, during the course of the determination of the application, the proposal was amended to provide a further 2 bed (duplex) instead of 2 x 1 beds making the proposed mix 2 x 1 bed and 2 x 2 bed. In addition, further marketing evidence and design alterations were also made upon a request from officers.
- 2.17 The Officer's Delegated report confirms that there is negligible market demand from credible parties for occupation of the building in either an existing or a refurbished capacity at a realistic rental level. This view was supported by Officer's in the Council's Economic Development Team.
- 2.18 More specifically, the Officer's delegated report confirms the following:

"Whilst it is acknowledged that the existing commercial units have tenants, this is a result of relatively low rental costs, due primarily to a poorly arranged building, its internal configuration and the lack of a lift. The site is therefore recognised as category 3 accommodation, insofar as it is isolated, with poor access – narrow streets, small doors, steps, no goods lifts and little or no space for servicing. Rented at a loss, the rental increase incurred by refurbishment as demonstrated in the submitted marketing evidence, would deter a significant number of potential clients. In overall terms and in mind of the Inspector's view held at 61-65 Charlotte Street, it

is considered by both officers of the Planning and the Economic Development Team, that the applicant has provided sufficient evidence to meet and comply with the policy requirements of CS8, DP13 and CPG5"

- 2.19 In summary, the LPA considered that the loss of Class B1 was justified in policy terms and, given that the existing use of upper floors at the adjacent buildings for residential accommodation, namely Nos. 2 – 2A, 4, 8, 12 and 14 Gate Street, the proposed use is considered appropriate and consistent with the immediate area, in line with policies DP13, CS6 and DP2.
- 2.20 In addition, the Council considered that the Loss of restaurant accommodation could not be resisted if the unit were to become A1, given that permitted development rights exist for this change of use.
- 2.21 In terms of the provision and quality of residential accommodation, the LPA found that the development met all of the policy requirements, namely;
- The flats would meet the minimum floorspace requirements according to the CPG standards;
 - The proposal would provide the appropriate number of 2 bedroom units for market housing;
 - The proposal largely complies with the Lifetime Homes criteria, particularly given the introduction of a lift;
 - All flats would comply with the minimum headroom standard.
- 2.22 In summary, the LPA considered that each of the proposed units would provide a satisfactory standard of living accommodation, two of which would be of high priority to Camden's housing stock.
- 2.23 The Council also considered that the mansard roof addition has been designed to relate to the architectural style and proportions of the façade below and that the building would remain a consistent height with neighbouring and adjacent buildings and would not be higher or feel out of place in this regard. Accordingly, the Council concluded that "in terms of detailed design, the proposed roof, rear extension and elevational alterations to the shopfront (including wooden clad entrance) in respect of size, scale and materials proposed is considered appropriate to the character and appearance of the main building.
- 2.24 It was also considered that the proposal would not give rise to any residential amenity concerns in respect of privacy or outlook; sunlight & daylight or noise.
- 2.25 In accordance with Council policy, the applicant accepted the principle of the car-free housing, secured by way of legal agreement. In addition, the Council considered that the level of cycle parking (5 spaces) located at ground floor level, compliant with guidance (secured by way of condition) was also acceptable.
- 2.26 It is for all of the above reasons why the proposal was considered to be policy compliant, which resulted in the grant of planning permission under delegated powers.

3.0 BACKGROUND & SCHEME DESCRIPTION

- 3.1 A detailed description of the proposed development is provided in the accompanying Design and Access Statement and Servicing Management Plan, which also provides a full analysis of the existing and proposed works to the building in the context of the Bloomsbury Conservation Area.
- 3.2 The proposal seeks to refurbish and upgrade the existing building on the site in order to preserve the positive contribution that it makes to the Bloomsbury Conservation Area. The proposal will provide a sustainable high quality mixed-use residential and retail/restaurant scheme.

Design

- 3.3 The design intention has been to refurbish and upgrade the existing design features of the site whilst also providing light touch extensions on order to enhance and contribute to the positive contribution the site makes to the Bloomsbury Conservation Area.
- 3.4 The proposals seek to create a scheme which positively contributes to local distinctiveness by retaining the historic appearance of the building on the site whilst adding extensions of the highest architectural quality.
- 3.5 For further detail in this regard please refer to the accompanying Design and Access Statement and Servicing Management Plan prepared by Lynas Architecture.

Land use

- 3.6 The proposals comprise the change of use of the second, third, fourth and fifth floor levels of the building from office to residential (274 sq.m GIA).
- 3.7 The site comprises dated office accommodation which appears to have originally been designed for residential use. The accommodation does not meet modern office standards and is not in a reasonable condition to allow the use to continue. External access to the accommodation is from the rear of the site. The entrance is unsecured and provides a poor frontage to the office accommodation. Internally the offices share a narrow staircase with the restaurant located at basement, ground and first floor levels of the building which presents a serious security and fire risk. There is no lift access and therefore the accommodation does not comply with current building regulations or disabled access standards. Furthermore, there are no refuse storage facilities, bike storage or showers, all of which would be required by modern office occupiers. The office units do not have raised floors and there is no air conditioning or double glazing, which results in overheating in the summer and heat loss in the winter. The toilet facilities are located internally for each unit and do not comply with current regulations. The office space is compromised by the existence of pillars which limit the useable space and reduces the flexibility of the space for

tenants and prevents any further subdivision.

- 3.8 The proposals will provide the opportunity to replace dated and unsuitable office accommodation with five high quality residential units (2 x 1 bed and 2 x 2 bed) in keeping with the Government's and the Council's policy priority for residential development.
- 3.9 The existing restaurant at basement, ground and first floor levels will be rationalised under the proposals and re-provided as a flexible retail/restaurant (A1/A3) unit at basement and ground floor levels. This will provide the opportunity to upgrade the existing accommodation.
- 3.10 The proposals will provide a viable and sustainable use for the building which will help to sustain the positive contribution that it makes to the Bloomsbury Conservation Area.
- 3.11 The proposed development will comprise high quality residential and retail accommodation which is in keeping with the local context.

Access

Vehicular Access

- 3.12 For deliveries to the scheme, service vehicles can access the development from Gate Street.

Pedestrian Access

- 3.13 The main entry and exit points for pedestrians to access the site will be from Gate Street. This will provide for disabled access.

Cycle Access

- 3.14 Cycle access to the proposed cycle parking area will be from Gate Street.

Car Parking

- 3.15 The proposed development will be car free. Restrictions will also be put in place to prevent residents applying for on street parking permits through a Section 106 agreement.

Cycle Parking

- 3.16 Five cycle spaces are proposed.

Planning Benefits

- 3.17 The proposed development will deliver a number of clear planning benefits for the site and surrounding area.

- 3.18 The design of the new development draws from the character and context of the site and the surrounding conservation area. The proposals will refurbish and upgrade the existing building. In addition, the proposals will provide a small rear extension and a mansard roof extension which will be in keeping with the character and appearance of the building and the surrounding conservation area. The proposed design is sympathetic and subservient to the character of the existing buildings and pays particular regard to the townscape features of the area.
- 3.19 In terms of land use, the proposed development will provide high quality residential accommodation in an existing building which is unsuitable for continued office use and not flexible for conversion to other business uses as confirmed within an independent valuation assessment prepared by Strettons. The scheme will contribute to the Council's policy priority of delivering mixed use development in a highly accessible location. The proposed development comprises a mix of residential units and will contribute towards the Council's objective of providing a diverse range of housing for a variety of end users. The proposed retail space will provide flexible accommodation for a variety of occupiers and will ensure the retail presence of the site on Gate Street is retained.
- 3.20 The proposed development will provide considerable sustainability benefits for the site, committing to achieve an Ecohomes 'Excellent' rating.
- 3.21 In summary, the proposed development will provide a wide range of planning benefits for the site and the surrounding area. The proposals will restore and refurbish the site and bring it back into use as high quality residential and retail accommodation, ensuring its long term function and sustainability. The proposed design is in-keeping with the character and context of the site and surrounding conservation area.

4.0 POLICY ANALYSIS

- 4.1 This section of the Statement outlines the relevant planning policy at national and local levels.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts should be made in accordance with the Development Plan, unless material considerations indicate otherwise. In this instance, the Development Plan for the area consists of the London Plan and the London Borough of Camden Local Plan (Adopted by the Council on 3 July 2017) which replaced the previous Core Strategy and Development Plan Policies Documents (2010).

Site Designations

- 4.3 The site lies within the Bloomsbury Conservation Area as defined by the Core Strategy Proposals Map (2010). The Bloomsbury Conservation Area Appraisal and Management Strategy (2010) identifies the site as making a positive contribution to the conservation area.

Principle of Use

Sustainable Development

- 4.4 The key theme of the document is the presumption in favour of sustainable development. Para 14 advises that this means "*approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or relevant policies are out of date, granting permission unless any adverse impact would significantly and demonstrably outweigh the benefits...*"
- 4.5 The application site is in a highly sustainable location (with a PTAL rating of 6b) and as such should be considered to be sustainable development when viewed against the provisions of paragraph 14 of the NPPF.

Loss of Office Floorspace

- 4.6 The application proposes the conversion and change of use of the second, third, fourth and fifth floor levels of the building from insufficient office accommodation to residential units.
- 4.7 Paragraph 55 of the NPPF states that local planning authorities should normally approve planning applications for changes to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in the area, provided there are not strong economic reasons why such development would be inappropriate.
- 4.8 In terms of planning policy, it has been identified at all levels that, particularly in the South East and Central London, the provision of housing must be a priority to

overcome the current shortage of accommodation. London Plan Policy identifies an underlying principle to encourage additional housing at appropriate locations. The London Plan sets an annual monitoring target for the provision of 8,892 houses in Camden between 2015 and 2025, which equates to an annual provision of 889 per year.

- 4.9 The adopted Local Plan recognised that many people want to live in Camden but there is a limited supply of homes and prices are high. Therefore, one of the key challenges is to provide a diverse range of housing and providing mixed areas with sustainable communities (see residential section below for further justification in this regard).
- 4.10 Policy E2: Employment Premises and Sites of the Local Plan, states that the Council will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction that the site or building is no longer suitable for its existing business use, and that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.
- 4.11 In this regard, paragraphs 5.37 to 5.39 of the adopted Local Plan provide a more detailed indicated of what the Council will require to support proposals involving the loss of business premises and sites. They say:
- 4.12 When assessing proposals that involve the loss of a business use to a non-business use they will consider whether there is potential for that use to continue. In particular, they will take into account various factors including:
- the suitability of the location for any business use;
 - whether the premises are in a reasonable condition to allow the use to continue;
 - the range of unit sizes it provides, particularly suitability for small businesses; and
 - whether the business use is well related to nearby land uses.
- 4.13 In addition to the considerations above, 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.
- 4.14 With reference to the above criteria contained in the Development Policies. The site is clearly not located in or adjacent to the Industry Area, nor is it in a suitable location for large scale general industry and warehousing. The site is unsuitable for light industry and local distribution warehousing. Conversely, it comprises dated office accommodation in a building which appears to have been designed for residential use. In addition, the existing office accommodation does not comprise adequate floor to ceiling heights, wide doors/corridors, loading facilities or space for servicing and parking of commercial vehicles.
- 4.15 The existing office accommodation does not, therefore, meet modern office standards and is not in a reasonable condition to allow the use to continue. External access to the office accommodation is from the rear of the site. The entrance is not secure and provides a poor frontage to the office accommodation. Internally the offices share a narrow staircase with the restaurant located at basement, ground

and first floor levels of the building which presents a serious security and fire risk. There is no lift access and therefore the accommodation does not comply with current building regulations or disabled access standards. Furthermore, there are no refuse storage facilities, bike storage or showers, all of which would be required by modern office occupiers. The office units do not have raised floors and there is no air conditioning or double glazing, which results in overheating in the summer and heat loss in the winter. The toilet facilities are located internally for each unit and do not comply with current regulations. The office space is compromised by the existence of pillars which limit the useable space and reduces the flexibility of the space for tenants and prevents any further subdivision.

- 4.16 Accordingly, the proposed development will replace dated office accommodation which is no longer fit for purpose or flexible for conversion to other business uses with high quality residential accommodation and therefore complies with Policy E2 of the adopted Local Plan.
- 4.17 The above view has been supported by an independent valuation and assessment undertaken by Strettons, which accompanies this planning application submission. This assessment confirms that the accommodation is dated and unsuitable for continued office use or for conversion for flexible business use. In addition, the Strettons' report concludes that the existing office accommodation would require substantial refurbishment works to bring it up to even the lowest level of modern standards and the level of investment required would not be viable when compared to the rents the refurbished office space would achieve.
- 4.18 The existing leases for the office accommodation expire in March and September 2017 at which point the property will become vacant. Given the poor quality of the existing accommodation and the viability issues associated with a refurbishment, this raises serious questions over the future office function of the site.
- 4.19 The Strettons report also provides detailed evidence on demand for office space in the area and concludes that there is little demand for this type of office accommodation in the area. Furthermore, the demand that exists relates to a standard of accommodation which is likely to prove unviable and beyond the physical capacity of the existing building.
- 4.20 Therefore, the existing building does not suit modern demands for office accommodation and a refurbishment would not be viable. The building is unsuitable for conversion for flexible uses due to a number of factors as set out above. Accordingly, the proposed change of use from office to residential complies with policies contained in the NPPF and Policy E2 of the newly adopted Local Plan.
- 4.21 Notwithstanding the above, this building's lack of suitability for office accommodation going forward, has been recognised within the Officer's report in relation to the original application, which confirms that the previous marketing evidence submitted states that there is negligible market demand from credible parties for occupation of the building in either an existing or a refurbished capacity at a realistic rental level, which was a view supported by Officer's in the Council's Economic Development Team).
- 4.22 More specifically, the Officer's delegated report confirms the following:

“Whilst it is acknowledged that the existing commercial units have tenants, this is a result of relatively low rental costs, due primarily to a poorly arranged building, its internal configuration and the lack of a lift. The site is therefore recognised as category 3 accommodation, insofar as it is isolated, with poor access – narrow streets, small doors, steps, no goods lifts and little or no space for servicing. Rented at a loss, the rental increase incurred by refurbishment as demonstrated in the submitted marketing evidence, would deter a significant number of potential clients. In overall terms and in mind of the Inspector's view held at 61-65 Charlotte Street, it is considered by both officers of the Planning and the Economic Development Team, that the applicant has provided sufficient evidence to meet and comply with the policy requirements of CS8, DP13 and CPG5”

4.23 In summary, the LPA considered that the loss of Class B1 was justified in policy terms and, given that the existing use of upper floors at the adjacent buildings for residential accommodation, namely Nos. 2 – 2A, 4, 8, 12 and 14 Gate Street, the proposed use is considered appropriate and consistent with the immediate area, in line with (the then) policies DP13, CS6 and DP2. This position has not changed, as confirmed within the Strettons' report and as such this proposal is still in full accordance with the newly adopted Local Plan Policy.

4.24 The NPPF seeks to significantly boost the supply of housing. Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development. Paragraph 50 supports the delivery of a wide choice of high quality homes, widening opportunities for home ownership and the creation of sustainable, inclusive and mixed communities.

- Seeking a range of self contained homes of different sizes to meet the Council's identified dwelling size priorities;
- Seeking a variety of housing types suitable for different groups; and
- Adjusting the type and mix of housing sought, having regard to the financial viability of development.

Local Plan Policy H1 recognises that self-contained housing is the priority land-use of Local Plan. Accordingly, this policy confirms that the council will seek to exceed the target for additional homes (particularly self-contained homes) by a number of measures, including “where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site”.

4.25 The proposed development will provide four high quality market residential units, thus contributing to the Council's requirement for a diverse range of housing products for a variety of different groups.

4.26 In summary, and taking these factors into account, it is therefore considered that the proposed residential use still accords with the planning policy objectives.

Unit Mix

4.27 Policy H6 – Housing Choice and mix contains the Council's objective to create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing suitable for Camden's existing and future

households, having regard to household type, size, income and any particular housing needs.

4.28 Policy H7 of the adopted plan (Large and Small Homes) requires the provision of a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities. In order to achieve this, this policy seeks to ensure that all housing development (including the conversion of non-residential properties) will contribute to meeting the priorities set out in the Dwelling Size Priorities Table and includes a mix of large and small homes. However, this policy also confirms that the Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development having regard to the following criteria:

- a. contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and
- b. includes a mix of large and small homes.
We will take a flexible approach to assessing the mix of dwelling sizes proposed in each development having regard to:
- c. the different dwelling size priorities for social-affordable rented, intermediate and market homes;
- d. any evidence of local needs that differ from borough wide priorities;
- e. the character of the development, the site and the area, including the impact of the mix on child density;
- f. site size, and any constraints on developing the site for a mix of homes of different sizes;
- g. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- h. the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing.

4.29 The proposed unit mix comprises 2x2 bed and 2x1 bed units. The unit mix has been dictated by the heavily constrained floorplates of the existing building which do not provide scope for a higher proportion of 2 or 3 bed units.

4.30 The unit mix is considered to be appropriate for the site location and the prospective occupiers of the proposed development and has previously been considered as being appropriate by the Council through the grant of planning permission for this proposal previously.

4.31 In accordance with policy H7 the proposed development will contribute towards meeting the Council's dwelling size priorities.

4.32 This has been recognised in the Officer's Report which states, that, in terms of the provision and quality of residential accommodation, the LPA found that the development met all of the policy requirements, namely;

- The flats would meet the minimum floorspace requirements according to the standards;
- The proposal would provide the appropriate number of 2 bedroom units for market housing;
- The proposal largely complies with the Lifetime Homes criteria, particularly given

- the introduction of a lift;
- All flats would comply with the minimum headroom standard.

4.33 In summary, the LPA considered that each of the proposed units would provide a satisfactory standard of living accommodation, two of which would be of high priority to Camden's housing stock. This is still the case with the revised proposal.

Retail

4.34 There is an existing restaurant at lower ground, ground and first floor levels of the building. The proposals will rationalise, upgrade and convert the existing restaurant to a flexible retail/restaurant unit (110sq.m GIA).

4.35 The proposals will retain retail use on the site and will not cause harm to the character, function or viability of the local area or the amenity of neighbours.

4.36 In their determination of the previous, identical proposal, the Council considered that the Loss of restaurant accommodation could not be resisted if the unit were to become A1, given that permitted development rights exist for this change of use. This is still the case, and as such, this element of the proposal should still be supported by the LPA on these grounds.

Accessibility

4.37 The 'Camden Planning Guidance Housing CPG2 [2016] provides advice on how proposals can be designed in an inclusive manner and be accessible to all by incorporating 'lifetime' home standards and creating wheelchair accessible units.

4.38 The proposed residential accommodation will be designed to meet these policy requirements, the Lifetime Homes Standards are individually addressed within the accompanying Design and Access Statement prepared by Lynas Architecture.

4.39 Further information on the disabled access for the scheme is outlined in detail within the accompanying Design and Access Statement prepared by Lynas Architecture.

Design and Conservation

4.40 Paragraph 65 of 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, is indivisible from good planning, and should contribute positively to making places better for people.*' Paragraph 58 of the NPPF outlines that '*planning decisions should aim to ensure that developments:*

- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*

- *optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
- *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
- *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
- *are visually attractive as a result of good architecture and appropriate landscaping.'*

4.41 The NPPF (paragraph 131) confirms that *'in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and have regard to the desirability of new development making a positive contribution to local character and distinctiveness.'* Paragraph 137 outlines that *'local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets to enhance or better reveal their significance.'*

4.42 The architects of the proposed development have taken account of all these factors in the design of the development. Similarly, the design has had regard to the Council's Design policies contained within the adopted Local Plan. In particular, the design:

- respects local context and character;
- preserves or enhances the historic environment and heritage assets in accordance with "Policy D2 Heritage";
- is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- is of sustainable and durable construction and adaptable to different activities and land uses;
- comprises details and materials that are of high quality and complement the local character;
- integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- preserves strategic and local views;
- provides a high standard of accommodation; and
- carefully integrates building services equipment.

4.43 In summary, the scheme comprises high quality architecture which responds to local character and history. The proposal is therefore in accordance with the NPPF and the adopted local policy in this regard.

Heritage

- 4.44 It is considered that the proposed alterations and extensions will enhance the character and appearance of the Bloomsbury Conservation Area in accordance with the London Borough of Camden's policy requirements.
- 4.45 In addition, the proposals will contribute to the long-term sustainability of the site and will ensure that it continues to contribute positively to the Bloomsbury Conservation Area within which the site is located.
- 4.46 Similarly, the proposed mansard extension is in keeping with the character and appearance of the Bloomsbury Conservation Area. There is an existing context of mansard roof extension in the site proximity including at no. 2 Gate Street and no. 4 Gate Street.
- 4.47 This is recognised within the Officer's delegated report in relation to the original application that confirmed that the Council also considered that the mansard roof addition has been designed to relate to the architectural style and proportions of the façade below and that the building would remain a consistent height with neighbouring and adjacent buildings and would not be higher or feel out of place in this regard. Accordingly, the Council concluded that "in terms of detailed design, the proposed roof, rear extension and elevational alterations to the shopfront (including wooden clad entrance) in respect of size, scale and materials proposed is considered appropriate to the character and appearance of the main building".
- 4.48 The proposed rear extension will also enhance the character and appearance of the conservation area. The extension will include the removal of the single storey takeaway unit to the rear of the site thus restoring the historic street pattern and enhancing the public realm in the area. The Bloomsbury Conservation Area Appraisal and Management Strategy (paragraph 5.173) makes reference to the importance of the historic street pattern in the area. The proposals will enhance the views of the proposal site from Little Turnstile Street. Careful attention has been paid to the detailing of the fenestration and brickwork on the rear elevation of the building to match that existing and ensure the retention of the building's historic appearance.
- 4.49 Accordingly, we consider that the proposal is in full accordance with the provisions of Policy D2 – Heritage of the Local Plan, in that the proposal will enhance the character of the Conservation area.
- 4.50 For further information on the design of the proposals please refer to the accompanying Design and Access Statement prepared by Lynas Architecture.

Amenity

- 4.51 In accordance with policy A1 – Managing the Impact of Development, the proposal will not cause any unacceptable harm to amenity and would ensure that the amenity of neighbouring properties are protected.
- 4.52 The Officer's Delegated Report in relation to the original application confirmed that the Council considered that the proposal would not give rise to any residential amenity concerns in respect of privacy or outlook; sunlight & daylight or noise. This

remains the case with the proposal that this the subject of this application, seeking as the proposal remains identical to that previously found to be acceptable and that the prevailing policy intentions have not altered in the interim.

Transport

- 4.53 Paragraph 35 of the NPPF states that developments should be located and designed, where practical, to accommodate the efficient delivery of goods and supplies, to give priority to pedestrian and cycle movements, and have access to high quality public transport facilities.
- 4.54 Similarly, Policy T1 – Prioritising Walking, Cycling and Public Transport, promotes sustainable forms transport.
- 4.55 In this regard, the site is highly accessible with a PTAL rating of 6b. A number of London underground stations are located in close proximity to the site. London Underground services can be accessed from Holborn to the west and Chancery Lane to the south.
- 4.56 The proposal also includes 5 cycle parking spaces in accordance with the Council's objectives to promote sustainable transport modes of travel.

Car Free and Car Capped Housing

- 4.57 In accordance with Policy T2 – Parking and Car-Free Development, the proposal does not propose to provide any on-site car parking provision. In addition, the applicant is prepared to enter into a legal agreement to ensure that residents are not able to request on-street parking permits, thereby being in full accordance with the provisions of Policy T2.

Sustainability/Renewable Energy Provision

- 4.58 The supporting Design & Access Statement describes the sustainable design and construction measures that can be incorporated into the design.

5.0 SUMMARY AND CONCLUSION

- 5.1 The proposal is for the refurbishment, conversion and change of use of the site to provide high quality residential and retail floorspace. A rear extension is proposed to accommodate an internal lift to serve the proposed residential accommodation.
- 5.2 The proposals will contribute to the long-term function and sustainability of the site which an independent viability assessment has confirmed would not be viable or suitable for office accommodation.
- 5.3 The proposal is considered to be of the highest architectural quality, respecting and enhancing the character and appearance of the site and surrounding conservation area. Careful consideration has been taken to ensure the proposals retain the historic form and appearance of the site.
- 5.4 The proposed development accords with the policies of the Development Plan and other planning policies and is seeking a 'renewal' of a previously permitted scheme that has already been considered as acceptable and policy compliant by the Council.
- 5.5 For the reasons set out in this Statement, the applicant seeks Full Planning Permission for the proposed development at 10 Gate Street in accordance with paragraphs 14 and 49 of the NPPF.