

# Rolfe Judd

Planning

On behalf of Rolfe Judd Planning Limited

# Redevelopment of 37 Gray's Inn Road

37 Gray's Inn Road, London, WC1X 8PQ

Planning Statement

RJP: P7017

Planning Portal Ref. PP-07763570

April 2019

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# Contents

1.0	Introduction	1
1.1	Summary	1
1.2	Planning Statement	2
1.3	Supporting Application Documents	2
2.0	The Application Site	4
2.1	The Site & Surrounding Location	4
2.2	Relevant Planning History	5
3.0	Pre-Application Consultation	7
4.0	The Proposal	9
5.0	Relevant Planning Policies	11
6.0	Planning Considerations	15
6.1	Land Use	15
6.2	Design	20
6.3	Heritage and Conservation	21
6.4	Archaeology	23
6.5	Environmental Considerations	23
6.6	Transport and Servicing	26
7.0	Conclusion	27

## Appendices

Appendix 1 Site Location Plan

# 1.0 Introduction

## 1.1 Summary

1.1.1 This Planning Statement has been prepared on behalf of Rodell Properties Limited in support of an application for planning permission for the redevelopment the existing property at 37 Gray's Inn Road, London, WC1X 8PQ (the 'site' – as identified in Appendix 1) and located within the London Borough Camden (the 'Council').

1.1.2 The application site measures approximately 160 sqm and comprises a four storey Victorian building, plus basement level. The property is currently in retail use (Class A1) at part-ground floor, with office use (Class B1) at part-basement, part-ground floor and the remaining upper floors (first, second and third floors).

1.1.3 The application scheme proposes the partial demolition of the rear of the building, a small rear and roof-top extension and reconfiguration of the existing floors to allow for a flexible retail, professional services or restaurant use at basement and ground floor and residential accommodation at first, second, third and fourth floor levels. The retained front façade would be restored with the introduction of a new traditional shopfront and new traditional windows. This Statement is submitted alongside a Design and Access Statement and other supporting documents which together address the key planning considerations for the proposed development.

1.1.4 The description of the development proposal reads as follows:

*“Part-demolition of the rear of 37 Gray's Inn Road to allow for the re-configuration of the existing building; new rear extension and single storey roof-top extension to form flexible retail (Class A1), professional services (A2), or restaurant (Class A3) uses at basement and ground floors; and residential accommodation (Class C3) at first, second, third and fourth floors (1 x 1 bedroom and 3 x 2-bedroom units); along with associated external works to the front elevation”.*

1.1.5 In summary, the proposal will allow for the following planning benefits:

- The viable and sustainable use of an existing outdated building in need of redevelopment;
- The restoration of an historic façade fronting the conservation area and re-instatement of traditional features, including a traditional shopfront and sash windows to create uniformity with the adjoining terrace (39-49 Gray's Inn Road);
- The provision of a traditional mansard roof extension to complement the adjoining terrace properties (39-49 Gray's Inn Road);
- The provision of high quality, priority sized, residential units (four units) which would contribute to the Borough's housing provision;
- An financial contribution towards the delivery of affordable housing within the Borough; and

- The creation of modern and high quality active ground floor flexible retail accommodation which would contribute to the surrounding street scene and local amenities.

1.1.6 The scheme has been led with the assistance of a specialist heritage consultant to ensure the appropriate redevelopment of the existing building whilst preserving the character and appearance of the surrounding Bloomsbury Conservation Area. The proposal would importantly retain and restore the established setting of the front façade, deemed to be an important feature along Gray’s Inn Road, and will provide continuity with surrounding ground floor uses, such as the recent redevelopment of 39-45 Gray’s Inn Road. The principal of the proposals has been supported by officers at pre-application discussions and has taken on board a number of alterations to reflect previous comments.

1.1.7 The development of the site would provide a number of enhancements and wider planning benefits which would be supportive of and in accordance with those plan policy objectives established within National Planning Policy Framework (NPPF), the London Plan, and Camden’s Local Plan. As such, for reasons outlined within this Statement, it is considered that the proposal can be supported by the Council.

## 1.2 Planning Statement

1.2.1 The purpose of this Statement is to examine the planning issues raised by the current development proposals for the application site. In particular, this statement identifies and describes the key opportunities presented by the development scheme and provides a comprehensive analysis of the relevant planning policy framework at national, strategic and local levels. As such, this planning statement is structured as follows:

Section 1: Introduction

Section 2: The Application Site and Surrounding Area – sets the context the current proposal and provides a detailed description of the application site;

Section 3: Pre-application Consultation – describes the previous consultation with the Council and statutory bodies;

Section 4: The Proposal – describes the proposed development;

Section 5: Planning Policy Context – summarises the planning policy relevant to this proposal at national, strategic and local levels;

Section 6: Planning Considerations – reviews the proposal in terms of the relevant policy context and other material considerations; and

Section 7: Conclusion

## 1.3 Supporting Application Documents

1.3.1 This Planning Statement should be read in conjunction with the following additional documents which support the application:

- Planning Application Forms – prepared by Rolfe Judd Planning
- Community Infrastructure Levy Forms – prepared by Rolfe Judd Planning

- Site Location Plan – prepared by Fresson & Tee
- Existing and Proposed Drawings – prepared by Fresson & Tee
- Design & Access Statement – prepared by Fresson & Tee
- Commercial Marketing Statement – prepared by Fresson & Tee
- Sunlight Daylight Report – prepared by Consil
- Historic and Archaeological Desktop Assessment – prepared by Archaeology & Planning
- Noise Impact Assessment – prepared by Hann Tucker
- Air Quality Assessment – prepared by Entran

1.3.2 The application has been submitted electronically online via the Planning Portal (ref. PP-07763570) along with the above documents.

## 2.0 The Application Site

### 2.1 The Site & Surrounding Location

- 2.1.1 The Site, 37 Gray's Inn Road, is located on the western side of Gray's Inn Road and located between the established commercial hubs of Holborn to the south, Farringdon to the east, and Kings Cross to the north.
- 2.1.2 The site, measuring approximately 160 sqm, forms part of a Victorian terrace which runs between Theobalds Road to the south and Northington Street to the north. The site currently comprises an office / consulting room (Use Class B1) at basement and part ground floor. A small retail unit is located at ground floor level (Class A1) which fronts onto Gray's Inn Road. The upper floors of the building, first, second and third floor are now vacant, however were formerly being used as offices (Use Class B1).
- 2.1.3 The building's existing floor areas and uses are detailed in the table below:

Floor	Existing Floor Area GIA (sqm)	
	Retail	Office
Basement		73
Ground	43	80
First		50
Second		50
Third		50
<i>Total:</i>	<i>43</i>	<i>303</i>

- 2.1.4 The site is bound by the co-op supermarket (39-49 Gray's Inn Road) and New Delis cafe (35 Gray's Inn Road). To the rear of the premises are a collection of former mews properties adjoining Kings Mews of varying ages and architectural styles. Most of these properties are currently under redevelopment for residential accommodation. Adjoining the site to the south and rear is the Grade II Listed 'Yorkshire Grey Public House'.
- 2.1.5 The surrounding area is symptomatic of the prevalent character of Bloomsbury and Gray's Inn Road, consisting of small scale former dwelling houses with active commercial uses at ground level fronting the street and either residential or commercial uses occupying the upper floors.
- 2.1.6 The site benefits from a good level of public transport, with a Public Transport Accessibility Level (PTAL) of 6b (excellent). Three underground tube stations and one train station are located less than a mile walk of the site, the closest being Chancery Lane (Central Line) approximately 0.3 miles to the south. Russell Square (on the Piccadilly Line) 0.6 miles to the north-west. Holborn tube station and Farringdon train station are approximately 0.5 miles walk.

## Plan Policy Designations and Identified Heritage Assets

2.1.7 Having consideration of the local plan policy designation for the application site and local area, the following are recognised as being applicable:

- London's Central Activity Zone (CAZ)
- Bloomsbury Conservation Area
- The property is an identified 'positive contributor' within the Conservation Area;
- Archaeological Priority Area
- Clear Zone Area - Central London Area (Air Quality)

2.1.8 The above planning designations have been carefully considered and informed the development proposals accordingly through its design.

## 2.2 Relevant Planning History

2.2.1 The following relevant planning history has been identified for the site using the Council's online planning database:

LPA Ref.	Proposal	Decision (Date)
2014/3356/P	Erection of 4th floor mansard roof extension with terrace and 3rd floor rear extension, following change of use of 1st, 2nd and 3rd floors from offices (Class B1) to 2 x 2 bed flats and 1 x 3 bed maisonette (Class C3).	Approved (24-11-2014)
2013/2634/P	Change of use of existing 1st, 2nd & 3rd floor offices (B1a) to create 3x self-contained flats (2x 2 Bedroom and 1x 1 Bedroom) (Class C3)	Approved (26-07-2013)
N15/7/2/30664	Certificate granted on 28 <sup>th</sup> January 1981 for lawful use of the first, second and third floors as offices	Approved (12-06-1980)

2.2.2 It is noted that the Applicant sought to implement planning permission 2014/3356/P, however due to a number of issues relating to existing tenants remaining in occupation and dialogue with contractors, the permission could not be implemented prior to it expiring. This application seeks to 'renew' the previous consent, albeit with a number of improvements to the wider development proposals.



2.2.3 In addition, there are a number of recent planning decisions which have been determined within close proximity of the site. These decisions represent a material consideration in the determination of the application proposals, having regard to such matters including historic setting, design, massing, and residential amenity. Those planning permissions of relevance include:

Address	LPA Ref.	Proposal	Decision (Date)
39-45 Gray's Inn Road	2013/3231/P	Redevelopment to provide 16 residential units (12 x 2 bedroom, 3 x 1 bedroom and 1 x studio) and 545sqm of ground floor and basement retail space (2 x Class A1 units), following partial demolition at Nos. 39 and 45 and full demolition at Nos. 41 and 43 Gray's Inn Road	Approved (06-11-2013)
29-30 King's Mews	2013/3231/P	Erection of new façade and second and third storeys following partial demolition of existing building in	Approved (18-07-2013)
23-30 Kings Mews & 43-45 Grays Inn	2009/0711/C	Demolition of Nos. 23-30 Kings Mews.	Approved (16-02-2009)

2.2.4 Having consideration of the above planning history (both the application site and those surrounding), the principal of works to the existing site and neighbouring premises have been accepted by the Council. This includes notably, the provision of a traditional roof extension, the partial demolition of the existing buildings to the rear, and the creation of new residential accommodation on upper floor levels. These established 'parameters' in terms of design and land use have been drawn upon by the proposed development scheme and discussed in detail at pre-application stage.

## 3.0 Pre-Application Consultation

- 3.1.1 In accordance with the National Planning Policy Framework (Paragraphs 39-46) and wider planning guidance, the applicant has engaged with the Council to ensure the efficient and effective development of the proposed scheme.
- 3.1.2 A request for pre-application advice was submitted to the Council in August 2018 (Ref. 2018/3456/PRE). A meeting was subsequently held with the Council in September 2018 and formal written advice issued in October 2018.
- 3.1.3 In summary, the Council acknowledged and advised on the following matters relating to the previous development scheme:
- The principle redevelopment of the site would be welcomed to provide high quality and improved accommodation, subject to design and local land use matters being suitably justified to meet local policies;
  - The principal change of use and loss of employment uses at upper levels could be supported by the Council, as per the previous applications on site, subject to the requirements of Local Plan Policy E2 being met. This would require the completion of an up-to-date marketing exercise to support any forthcoming application;
  - The replacement of the existing retail unit at ground floor level with office accommodation would unlikely be supported given its important role outside of an existing town centre and is considered a desirable location for continued or improved retail offer;
  - It was acknowledged that the heritage 'significance of the building largely resides in its external appearance as a mid-19 century dwelling which forms part of the terrace'. As such, the proposal for the retention of the front façade and partial demolition of the rear is acceptable;
  - The proposed rear extension would be acceptable in context of the previously altered terrace properties adjoining the site (39-45 Gray's Inn Road);
  - The proposed restoration of the front elevation, namely replacement shopfront and new aligned upper floor windows would be welcomed and make a positive contribution to the conservation area;
  - The mansard roof extension at fourth floor level is welcomed and would 'reinforce the roofscape creating a more cohesive and uniform terrace' with those adjoining premises (39-45 Gray's Inn Road);
  - Subject to the loss of employment uses, the proposed residential accommodation would be of a good quality and meet the Council's priority dwelling sizes; and
  - The provision of a rear terrace / balcony would not be supported given the potential concerns relating to overlooking and privacy to those new residential dwellings at Kings Mews currently under construction.

3.1.4 Accordingly, having consideration of those discussions at pre-application stage and the evolution of the scheme with the wider project team, the following amendments and additional supporting information was subsequently considered to reflect the advice received from the Council:

- A comprehensive marketing assessment has been undertaken by consultants Fresson & Tee summarising the marketing of the premises over the recent years in order to support the application with regards to the loss of poor quality office accommodation on site;
- The proposal now includes the retention and improvement of the existing retail accommodation at basement and ground floor which would provide a positive addition to the surrounding area;
- The proposed basement extension works have now been excluded from the proposed development following consultation with the structural engineer and heritage consultant; and
- The proposed terrace to the rear has been removed from the development to ensure the protection of adjoining residential amenity in terms of privacy and overlooking.

## 4.0 The Proposal

4.1.1 The proposals have been prepared by Fresson and Tee on behalf of Rodell Properties, to seek the sensitive reconfiguration and extension of the existing building and consolidation of existing uses on site. The scheme has been carefully considered to ensure the retention of the historic character of the existing front façade whilst seeking to optimise the poor internal layouts and ensure a future viable use for the building.

4.1.2 The proposed development description is summarised as follows;

*“Part-demolition of the rear of 37 Gray’s Inn Road to allow for the re-configuration of the existing building; new rear extension and single storey roof-top extension to form flexible retail (Class A1), professional services (Class A2) and restaurant (Class A3) at basement and ground floors; and residential accommodation (Class C3) at first, second, third and fourth floors (1 x 1 bedroom and 3 x 2-bedroom units); along with associated external works to the front elevation”.*

4.1.3 The proposals follow those established principals under the previous planning permissions permitted by the Council in 2012 and 2014 which sought the change of use of the upper floors to provide residential accommodation along with minor external works, including a fourth floor mansard roof extension.

4.1.4 The proposal will include the internal reconfiguration of the building and change of use to provide the following land uses and proposed floor areas, as detailed in the table below:

Floor	Existing Floor Area GIA (sqm)	
	Flexible Use (Classes A1, A2, A3)	Residential (Class C3) (incl. circulation space)
Basement	78	
Ground	118	19
First		90
Second		79
Third		80
Fourth		69
<i>Total:</i>	<i>196</i>	<i>337</i>

4.1.5 The proposed works can be summarised as follows;

- Partial demolition of the rear of the building and re-construction with minor rear extension (aligned with existing rear elevation of 39 Gray’s Inn Road)
- New fourth floor traditional mansard roof extension (as previously consented and to match the adjoining roofline of 39-49 Gray’s Inn Road);
- Replacement single storey ground floor extension;

- New third floor traditional sash windows to match / align with second floor on the front elevation;
- A new traditional shopfront to replace the current modern ground floor frontage;
- Change of use of existing ground and basement floors to flexible use for either retail (Class A1), professional services (Class A2) or restaurant (Class A3);
- Change of use of existing first, second and third floor from office (Class B1) to provide new residential accommodation at first, second, third and fourth floors (4 units);
- New central lift core with level access across all upper floors;
- Secure bin and cycle storage for each residential unit;
- Car free development with no parking spaces provided on-site;
- New plant housing at first floor level to the rear of the building for future residential and commercial servicing; and
- Energy efficient building fabric which will contribute to the reduction of carbon emissions and ensure compliance with Building Regulations Part L (Conservation of fuel and power).

4.1.6 Please refer to the submitted drawings and Design and Access Statement for further details.

#### **S.106 Obligations and CIL Contributions**

4.1.7 Accordingly, the following Section 106 obligations and Community Infrastructure Levy (CIL) contributions have been identified as being necessary and will form part of an appropriate legal agreement:

- Mayoral CIL (£80 per sqm);
- Local CIL (Zone A – Central – £500 per sqm);
- A construction management plan;
- Affordable housing financial contribution; and
- A restriction on residential parking permits.

4.1.8 If necessary, further obligations will be given due consideration by the Applicant where they may be considered necessary by the Council in order to make the development acceptable in planning terms.

## 5.0 Relevant Planning Policies

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions should be made in accordance with the development plan unless material considerations indicate otherwise.

5.1.2 The statutory development plan for the application site comprises the following documents:

- London Plan (2016)
- Camden Local Plan (2017)

5.1.3 Material considerations include the National Planning Policy Framework (NPPF) and the local planning authority's supplementary planning guidance (SPG or 'CPG') documents. Further material considerations includes the emerging draft 'London Plan' (December 2017).

5.1.4 Extracts from the relevant policy and guidance documents are set out below, starting with national, strategic and finally local plan policy and supporting guidance documents:

### **National Planning Policy Framework (2019)**

5.1.5 The National Planning Policy Framework (NPPF) was adopted in March 2012 and further updated in 2018 and 2019. At the core of the NPPF is a presumption in favour of sustainable development which should be at the heart of both plan making and decision taking. The NPPF outlines the criteria against which development proposals will be considered 'sustainable' having regards to three mutually dependant roles which planning must consider together; economic, environmental and social.

5.1.6 The NPPF guides Local Planning Authorities (LPA) to adopt a pro-active approach to considering planning applications and should apply a 'presumption in favour of sustainable development'. The following sections of the NPPF are considered to be relevant in the determination of the proposed scheme:

- *Achieving Sustainable Development:* The NPPF seeks LPAs to play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. This includes approving development proposals that accord with an up-to-date development plan without delay.
- *Delivering a Sufficient Supply of Homes:* The NPPF sees to significantly boosting the supply of homes across the Country. LPA's should therefore recognised those small and medium sized sites which can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. New developments should provide an adequate mix, size, type, tenure and range of housing, as well as seek to meet local affordable housing requirements.
- *Making Effective Use of Land:* Given the requirement to increase the supply of homes, LPA's should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Planning decisions should, recognise that some

undeveloped land can perform many functions; give substantial weight to the value of using suitable brownfield land within settlements for homes and support appropriate opportunities to remediate derelict land; promote and support the development of under-utilised land, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. The government are clear that LPA's should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs.

- *Achieving Well-designed Places:* The NPPF identifies the importance of not only visually attractive architecture in new buildings, but also the need for a high quality and inclusive design alongside appropriate landscaping that connects people with places and the integration of the new development into the existing environment. LPA's however should not seek to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles.
- *Conserving and Enhancing the Historic Environment:* The NPPF seeks to ensure that LPA's plan positively for the conservation and enjoyment of the historic environment. In determining planning applications, local planning authorities should take account of:
  - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. LPA's should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

- 5.1.7 In addition to the above, further detailed national planning guidance is provided online via the government's 'National Planning Practice Guidance' published in 2012 (as amended). The extensive document is continually updated to reflect recent changes in legislation and ministerial statements and sets out the government's planning policies for England and how these are expected to be applied.

### **The London Plan (2016)**

- 5.1.8 The policies and guidance within the London Plan is consistent with both national objectives to promote sustainable forms of development and maximising housing delivery. The following sections and policy numbers of the London Plan are considered to be relevant to the determination of the proposed scheme:

- Policy 2.9 - Inner London
- Policy 2.10 - Central Activities Zone – Strategic Priorities
- Policy 2.11 - Central Activities Zone – Strategic Functions
- Policy 3.3 - Increasing housing supply
- Policy 3.4 - Optimising Housing Potential
- Policy 3.5 - Quality and design of housing developments
- Policy 3.8 - Housing choice
- Policy 5.3 - Sustainable Design and Construction
- Policy 7.4 - Local character
- Policy 7.8 - Heritage Assets

5.1.9 The above policies are supported by a number of Supplementary Planning Guidance (SPG) for the London Plan, providing further detailed design information. Of relevance to this application includes the Mayor's 'Housing SPG' (2016).

5.1.10 It is further noted that the emerging draft London Plan (July 2018) has recently completed public consultation and is considered as part of this application.

#### **Camden Local Plan (2017)**

5.1.11 The Camden Local Plan was adopted in 2017 and establishes the strategic and local planning objectives for the area. The following policies of the Local are applicable to the consideration of this development:

- Policy H1 - Maximising Housing Supply
- Policy H2 - Maximising the supply of self-contained housing from mixed-use schemes
- Policy H4 - Maximising the supply of affordable housing
- Policy H6 - Housing Choice and Mix
- Policy H7 - Large and Small Homes
- Policy C6 Access for All
- Policy E1 - Economic Development
- Policy E2 - Employment Premises and Sites



- Policy A1 - Managing the Impact of Development
- Policy A4 - Noise and Vibration
- Policy D1 - Design
- Policy D2 - Heritage
- Policy D3 - Shopfronts
- Policy TC1 - Quantity and Location of Retail Development
- Policy TC2 - Camden's Centres and other shopping areas
- Policy TC3 - Shops outside of Centres
- Policy TS5 - Small Independent Shops

#### **Supplementary Planning Guidance**

5.1.12 The following supplementary planning guidance documents are relevant to the consideration of the proposal:

- Bloomsbury Conservation Area Appraisal and Management Strategy
- CPG 1 Design (2018)
- CPG 2 Housing (2018)
- CPG 3 Sustainability (2018)
- CPG Employment Sites and Business Premises (2018)
- CPG 6 Amenity (2018)
- CPG 7 Transport (2011)
- CPG 8 Planning Obligations (2018)

## 6.0 Planning Considerations

### 6.1 Land Use

#### **Provision of Residential Accommodation**

- 6.1.1 National guidance supports the suitable re-use of land where appropriate for alternative land uses which would be complementary to a local area. The NPPF encourages the 'effective use of land in meeting the need for homes'. Paragraph 59 states that government's objective is to significantly boost the supply of homes. Paragraph 68 states that 'small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly... and LPA's should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes'. Paragraph 117 states that 'planning decisions should promote an effective use of land in meeting the need for homes... in a way that makes as much use as possible of previously-developed or 'brownfield' land'. Paragraph 118 adds that local planning authorities should 'give substantial weight to the value of using suitable brownfield land within settlements for homes... especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively'.
- 6.1.2 Having considerations of the most recent national planning policies, the proposal would support the principals of the NPPF and seek to deliver a sustainable development through the effective re-use of land for housing. Such proposals should therefore be given substantial weight by the Council.
- 6.1.3 As part of its target of 42,000 new homes in London per annum, Policy 3.3 of the London Plan sets out the housing targets for the individual boroughs. The Council's targets include the addition of 8,892 new homes over the plan period of 2015-2025 (or 889 units per annum). The Mayor and London Plan further encourages local authorities to 'exceed' their allocated housing targets and states that the potential to realise brownfield housing capacity should be provided through intensification and sensitive renewal of existing residential areas and mixed use redevelopment schemes.
- 6.1.4 Local Plan Policy H1 (Maximising the Supply of Housing) seeks to exceed this target by ensuring self-contained housing is recognised as the priority land-use for the Local Plan. In particular, the Policy further states that the Council will actively resist the alternative development of sites identified for housing under a current planning permission. This site is already subject to a recently expired planning permission for residential accommodation to provide four new self-contained dwellings. The current proposal seeks the delivery of four new residential units which is supportive of and in accordance with Local Plan Policy H1 through the delivery of a 'priority land use' (self-contained housing) and to contribute towards the total provision of housing across the Borough.
- 6.1.5 Local Plan Policy H7 (Large and Small Homes) requires new residential developments to include a mix of types and sizes of homes to reflect the needs of the Borough, taking into account the characteristics of the site and current evidence in relation to housing need. The proposed scheme includes a mixture of units comprising of 1 x 1-bedroom units and 3 x 2-bedroom units. The proposed mixture would be supportive of the Council's 'priority housing mix, with 1-bedroom units being low priority and 2-bedroom units being high priority.

6.1.6 All units would comply with the national housing standards and be built to meet the London Plan housing design guidelines where appropriate, having consideration of the restriction created by the existing built footprint and retained façade. The proposed units sizes are noted below for clarity:

- First Floor: 2b4p (76sqm)
- Second Floor: 2b3p (65sqm)
- Third Floor: 2b3p (65sqm)
- Fourth Floor: 1b2p (55sqm)

6.1.7 Having regards to Local Plan Policy H6 (Housing Choice and Mix), the proposal would provide high quality accessible homes for future households. Each unit, as shown on the proposed drawings and supported by officers during pre-application discussions, would provide functional, adaptable and accessible space with the provision of level access at each floor. The proposals would therefore complying with the requirements of Building Regulation M4(2) (Accessible and Adaptable Homes) and Local Plan Policy C6 (Access for All).

6.1.8 As part of the development and in accordance with Local Plan Policy H4 (Maximising the supply of affordable housing), it is recognised any future residential accommodation on site will be subject to an affordable housing financial contribution from all development that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm of GIA or more. This will be calculated and confirmed with the Council's planning obligations team during the application's determination. Any final payment would be secured via a suitably worded legal agreement.

6.1.9 It is therefore considered that the proposed development would be supportive of both national and local policy objectives to increase housing delivery on underused brownfield sites and would comply with the guidance for quality of new homes.

#### **Loss of Office Accommodation**

6.1.10 Since the granting of planning permission in 2014, the applicant had been previously progressing matters on site to try to implement the previous planning permission. However, given to structural complexities and the requirement to retain the previous retail tenant at ground floor, a number of concerns were raised by contractors tendering for the job over the safety of the works to the building whilst part occupied. As such, works have been unsuccessful on site and during this time and the offices have remained vacant with little commercial interest.

6.1.11 As previously noted, the NPPF requires local planning authorities to consider the effective use of land in order to address the growing need for homes across the country, and in particular, London. Accordingly, Paragraph 118 states that planning decisions should 'promote and support the development of under-utilised land and buildings, especially if this would help to meet an identified need for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops)'.

6.1.12 Of particular relevance to this application, the NPPF further adds under Paragraph 120 that planning decisions 'need to reflect changes in the demand for land'; with applications for alternative uses being supported where the

proposed use would contribute to meeting an unmet need for development in the area. Similarly, Paragraph 121 adds that 'local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres'.

- 6.1.13 In accordance with the most up-to-date national planning policy framework, the proposal would seek the redevelopment and alternative use of an 'under-utilised' office building for a priority use such as housing. This would include the change of use of out-dated and vacant employment accommodation at upper floors levels (above retail accommodation) to provide good quality housing in an area of 'high housing demand'.
- 6.1.14 London Plan Policy 4.2 (Offices) seeks to consolidate and extend new office accommodation in accessible and designated growth areas, whilst support the managed conversion of surplus office accommodation to more viable and complimentary uses. As demonstrated further in this statement, it is considered that current outdated office accommodation would be better suited towards the provisions of housing, akin to its historic use.
- 6.1.15 Local Plan Policy E2 (Employment Premises and Sites) states that Council will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden's residents. Development of business premises and sites for non-business use will be resisted unless the site is no longer suitable and 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.
- 6.1.16 The existing office units are cramped and dislocated between several rooms and floor levels – this being typical of historic converted floorplates which would have originally been in residential use. Access is provided by small narrow steps which limit accessibility for employees and clients. The current condition of the offices is considered to be unfit for modern business needs and deemed to be uncompetitive against local serviced office providers within the nearby locality.
- 6.1.17 In support of this application and meeting the requirements of Local Plan Policy E2 (and Camden Planning Guidance), a supporting Marketing Report has been prepared by agents Fresson & Tee. The report outlines in detail the following:
- A description of the existing office accommodation;
  - A summary of the marketing exercise undertaken to date (including previous agents);
  - A summary of interest from commercial tenants;
  - Previous internal refurbishment and investment of the existing space;
  - Consideration of the space for alternative business users; and

- A summary of existing offices in the nearby area, their quality, and comparative rental levels.

6.1.18 Having consideration to the guidance contained within the employment CGP and supporting policy text of Policy E2, the report provides detailed evidence of the properties marketing exercise over a sustain period of two years; has been marketed at competitive and realistic prices; has included the consideration of alternative forms of development; and possible occupation by alternative occupiers. In conclusion, the Marketing Report states that:

*“The Building has been actively marketed continuously for the last 10 years other than for brief sporadic periods whilst the owners, Rodell Properties, occupied first, second and third floors in an effort to implement the previous planning permission.*

*Even during this brief hiatus, whilst planning permission was being considered, a marketing board remained at first, second and third floors “The Uppers” and active marketing continued with no interest.*

*Fresson and Tee are of the opinion that the market conditions have changed significantly over the past 10 years.*

*Offices of this size, layout and specification on Gray’s Inn Road are dated and do not reach current occupiers expectation and modern requirements - as such the building remains vacant. The evidence gathered in this report is testimony to this.*

*During this 10 year period the building has generated no significant interest and no offers have been received, despite prolonged periods of active marketing by different agents.*

*The first, second and third floors “The Uppers” in their current state would not attract attention, and the level of investment required would not achieve a viable return on market values to warrant undertaking the work given existing comparable office accommodation in better suited buildings and in more suitable locations”.*

6.1.19 Having consideration of the proposed development in light of Local Plan Policy E2 and findings of the submitted marketing report, it is concluded that:

- the site is no longer suitable for its existing business use, as demonstrated by the lack of commercial interest during a combined marketing period of 10 years;
- the possibility of retaining or reusing the building for similar or alternative type and size of business use has been fully explored, with competing larger, flexible office providers within the nearby locality offering competitive and superior office accommodation. In addition, the current condition and historic layout of the premises does not lend itself to a modern, commercial operator;
- whilst the current location for business use is considered to be suitable and highly accessible, the close proximity to major office locations (Chancery Lane, Holborn, Farringdon and Kings Cross) which includes a number of modern and flexible workspace providers means the existing office is at unable to compete or offer an attractive alternative to commercial tenants;

- the potential use of the space by 'small' businesses is again constrained by those alternative locations which offer better servicing arrangements, flexible leases, combined services and opportunities for interaction and synergy between a variety of small businesses;

6.1.20 In addition to the most recent marketing report, it is noted that the loss of office accommodation was previously accepted by the Council under two previous planning applications (Ref. 2013/2634/P & 2014/3356/P) at the site. As part of these applications, officers noted that:

*"In terms of the building's layout and condition, the upper floors are firstly accessed via a main entrance door directly from the street, which leads onto a narrow communal hallway, with a further entrance door up leading up to a steep, narrow flight of steps... the upper floors are of a traditional residential design with traditional chimney breasts (it would be reasonable to assume it was originally used for residential purposes)... given the limited amount of overall accommodation (approx. 130 sqm over three floors), it would not be able to be split into individual units for other office or commercial uses... In light of above findings, the owners of the property are considered to have sufficiently justified that the existing employment floorspace is unsuitable and of a poor quality for Class B1 offices, requiring a considerable investment to achieve a comparable standard of floorspace which is currently available within the site's locality. The proposed loss of B1a use is therefore considered to be in accordance with the Guidance set out in CPG5 and policies CS8 and DP12 of the LDF"*

6.1.21 It is therefore considered that the proposed development would be supportive of strategic policy objectives to allow for the loss of the existing office accommodation where it has been successfully demonstrated that there is no viable continued or alternative use of the premises.

#### **Flexible Uses (Classes A1, A2, A3)**

6.1.22 The NPPF seeks to support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

6.1.23 London Plan Policy 2.10 (Central Activity Zones – Strategic Priorities) seeks to support and improve the retail offer within the CAZ for residents, workers and visitors. In addition, London Plan Policy 4.8 (Supporting a Successful and Diverse Retail Sector) seeks to support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need.

6.1.24 Local Plan Policy TC1 (Quantity and location of retail development) seeks to promote the distribution of retail and other town centre uses across the borough, with an appropriate provision outside designated centres to meet local needs. Additional, Local Plan Policy TC3 (Shops Outside of Centres) will seek the protection of shops outside of designated town centres.

6.1.25 The site is location within London's Central Activity Zone, however is not located within any designated frontage or local centre.

6.1.26 The existing retail unit is of limited size (approx. 43 sqm) at part-ground floor and is therefore considerably compromised for commercial operators. The proposal would seek to improve the existing retail function and layout of the unit by extending the unit across the entire basement and ground floor. The new unit provided on

site would include a flexible use for either Classes A1, A2, A3 (196 sqm). The proposed is considered to be appropriate to the surrounding location which is predominately formed by ground floor active uses. The expansion of the existing retail provision at ground and basement floor would provide a considerable benefit to the local area for both residents and workers, offering a competitive and diverse retail sector along Gray's Inn Road.

6.1.27 The proposal is therefore considered to be supportive of and accord with national, strategic and local plan policy objectives to improve the quality and quantum of retail accommodation within central London.

## 6.2 Design

6.2.1 The NPPF stipulates that the creation of high quality buildings is fundamental to what the planning and development process should achieve, with good design being a key aspect of sustainable development.

6.2.2 London Plan Policy 7.6 (Architecture) states that development should make a positive contribution to a coherent public realm and streetscape. Development should incorporate the highest quality materials and design appropriate to its context.

6.2.3 Local Plan Policy D1 (Design) seeks to secure high quality design in development which respects local context and character and preserves or enhances the surrounding historic environment. In addition, Local Plan Policy D2 (Heritage) further states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings and locally listed heritage assets.

6.2.4 The proposal seeks to provide a simple traditional mansard roof extension and rear extension to optimise the accommodation on site and complete the existing terrace roofscape as per the recently completed development at 39-45 Gray's Inn Road. Having regard to the adjoining premises and rear extension, the Council stated that:

*"The loss of the existing rear elevations to all buildings, and with particular regard to Nos.39 and 45 Gray's Inn Road is thus not considered to be materially harmful. This is because of the small level of significance they offer to the conservation area".*

*"The principle of the increased building depth across the site is thus considered acceptable... When assessed against the surrounding built form, the proposed rearward building line matches the majority of those within the terrace, particularly the adjoining buildings of No. 47 to the north, and only minimally (between 1-2m) extending beyond the closet wing extension of No.37 to the south".*

6.2.5 The proposed rear extension would extend the existing building to that of the built line of 39 Gray's Inn Road. The extension would 'utilise' an existing gap between the rear of 35 Gray's Inn Road and the recently completed rear elevation of 39 Gray's Inn Road to improve the proposed internal residential layouts. The rear extension would not be visually apparent within the surrounding conservation area (as previously noted) and is therefore not considered to detrimentally impact upon the character of appearance of the Bloomsbury Conservation Area.

- 6.2.6 The proposed roof extension would match that of the recently completed roof extensions at 34-49 Gray's Inn Road with the use of traditional slate and lead dormers. The proposed upper dormers would align to the windows on the lower floors to unify the building across the front elevation. The development would therefore provide a sensitive infill of the existing gap and restore / harmonise an established terrace within the conservation area.
- 6.2.7 The works would not impact upon the existing character or appearance of the conservation area nor would it have a detrimental impact upon the future residential amenity to those consented units to the rear of Kings Mews.
- 6.2.8 Local Plan Policy D3 (Shopfronts) will require a high standard of design in new and altered shopfronts with particular attention being given to the existing character, architectural and historic merit and design of the host building.
- 6.2.9 The existing shopfront is non-original with a modern twentieth century metal and plastic shopfront design. The proposal seeks to replace the existing frontage with a contemporary timber shopfront with glazing which complements the future commercial occupation of the ground floor. The new shopfront considers the careful inclusion of traditional design features such as stall risers and corncicing which would respect the host building.
- 6.2.10 The proposal is therefore considered to accord with Local Plan Policy D1 (Design) which requires that the height, scale and massing of buildings should be appropriate within the local context and preserves and enhances the historic environment and heritage assets in accordance with Policy H2 (Heritage).

### 6.3 Heritage and Conservation

- 6.3.1 The proposal would seek the retention of the existing front façade with the part demolition of the rear to facilitate the new roof extension and rear extension. The application site is located within the Bloomsbury Conservation Area, but recognised as a 'building of merit'.
- 6.3.2 The NPPF, Paragraph 193, outlines that when considering the impact of a proposed development on the significance of a designated heritage asset; great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. The NPPG defines significance as the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. Paragraph 196 states that where development would lead to less than substantial harm of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 6.3.3 London Plan Policy 7.8 (Heritage Assets and Archaeology) stipulates that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.



6.3.4 Local Plan Policy D2 (Heritage) further states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings and locally listed heritage assets. Having consideration of partial demolition, the Council will resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area.

6.3.5 In support of this planning application, a Heritage Assessment has been completed by consultant Archaeological Planning. The heritage assessment concludes that;

*"The proposed redevelopment will include the partial demolition of the rear elevation and the re-configuration of the internal floors. However, the frontage of the building will be retained, cleaned and restored and the loss of the remaining fabric, which is considered to be of low significance, can be mitigated by a programme of building recording which could be carried out prior to any demolition works occurring.*

*The proposed redevelopment will result in an enhancement to the appearance of the conservation area and to the immediate setting of the grade II listed Yorkshire Grey public house through the restoration of the frontage and by bringing the building back into use".*

6.3.6 Upon assessment, and in light of the those previous officer comments for the redevelopment of the adjoining buildings at 39-45 Gray's Inn Road (and Kings Mews), the Council noted that 'whilst the rear elevation modestly adds to the main significance of the building, the building's primary contribution to the conservation area lies in the front elevation, which sits within an informal composition of terrace house type properties'. This is considered an accurate description for the adjoining application building at 37 Gray's Inn Road, which remains of similar age and appearance. In addition, the Council added:

*"...it is considered the significance of the rear of the property is of limited value and therefore less weight should be given to its conservation (as opposed to the front elevation). There are extremely limited views of the rear of the building with the site being screened by the properties on King's Mews, which could increase in height as a result of recent approvals. The rear elevations of No 37 sits between the much bulkier buildings at No.35 Gray's Inn Road and the properties to the north at Nos.41-53 Gray's Inn Road, which all combine together to form the predominant character and appearance of this part of Bloomsbury Conservation Area".*

*"The loss of the existing rear elevations to all buildings, and with particular regard to Nos.39 and 45 Gray's Inn Road is thus not considered to be materially harmful. This is because of the small level of significance they offer to the conservation area..."*

6.3.7 Accordingly, it is considered that the proposal would complement that of the existing approved development at 39-45 Gray's Inn Road and would not result in the harm to the surrounding conservation area (that being the designated heritage asset).The retention of the front façade and minor alterations to 'restore' a symmetrical and balanced window alignment would represent a positive enhancement and can be supported by the Council.

6.3.8 The proposal is therefore considered to be supportive of and accord with national, strategic and local plan policy objectives to conserve or enhance the significance of those identified heritage assets, their settings and wider historic environment.

## 6.4 Archaeology

6.4.1 The scheme is designated as being within an Archaeological Priority Zones (APZs).

6.4.2 NPPF Paragraph 189 states that when determining applications where a site has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment. London Plan Policy 7.8 (Heritage Assets) also states that development which may impact upon designated archaeology should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

6.4.3 Local Plan Policy D2 (Heritage) states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting.

6.4.4 In support of this application consultants Archaeological Planning have prepared a Historic Environment Assessment (also known as a desk based assessment) setting out the likely impacts upon the significance of the assets arising from the proposal and recommendation for further mitigation where necessary. The report concludes:

*"In terms of archaeology, the proposed redevelopment of 37 Gray's Inn Road will have a harmful effect on any surviving archaeological remains of low significance during the construction groundworks for the basement and ground floor levels. However, this effect can be mitigated by a programme of archaeological recording during the groundworks".*

6.4.5 As concluded by the report, whilst it is considered that there is a 'low' potential for buried heritage assets on site, it is recommended that a watching brief and Written Scheme of Investigation (WSI) is prepared and implemented to safeguard any potential remains which may be discovered during the initial construction of the development. Such mitigation can be secured by means of a suitably worded planning condition.

6.4.6 The proposal is therefore considered to be supportive of and accord with the national, strategic and local plan policy objectives to investigate and where appropriate safeguard those identified buried heritage assets.

## 6.5 Environmental Considerations

### **Daylight and Sunlight**

6.5.1 London Plan Policy 7.6 (Architecture) states that proposed development should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.

6.5.2 Local Plan Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity, including notably, sunlight, daylight and overshadowing.

6.5.3 In support of this application, daylight consultants Consil have confirmed that the proposals will not cause any noticeable loss of daylight to the surrounding buildings given the developments and would accord with BRE guidance for daylight and sunlight. The report concludes:

*“Our analysis demonstrates that the proposed extension to 37 Gray’s Inn Road would have a limited effect on the daylight and sunlight amenity receive to the surrounding residential properties when assessed in accordance with the guidelines set-out in the BRE Report.*

*There would be marginal losses of daylight to two rooms in 35 Gray’s Inn Road and to a scheme currently under construction to 29-30 King’s Mews. However, these properties would retain daylight and sunlight levels which are commensurate for a dense urban environment and in line with the expectations of occupants of such an area.*

*All other neighbouring properties assessed would comply with the BRE Report guidance for daylight and sunlight amenity”.*

6.5.4 The application scheme is therefore considered to be in accordance with Policy A1 of the Local Plan in minimising any adverse impacts on existing residential amenity in terms of daylight and sunlight.

#### **Overlooking and Privacy**

6.5.5 Local Plan Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity, including notably, visual privacy, outlook.

6.5.6 The proposals have been carefully designed to ensure there any opportunity for overlooking is limited.

6.5.7 It is confirmed that no windows will overlook directly across from one another from the rear premises onto Kings Mews. The proposal has been carefully designed to allow all primary living accommodation to front onto the external amenity space (south facing), thereby affording maximum levels of natural light and direct sunlight for future residents, whilst also maximising privacy.

6.5.8 The proposal is therefore considered to be in accordance with Policy A1 of the Local Plan, in minimising any adverse impacts on existing and future residential amenity in terms of privacy and overlooking.

#### **Noise Impact Assessment**

6.5.9 In support of the application, a Noise Impact Assessment has been completed by consultants Hann Tucker. The report concluded that the ‘suitability of the site for residential development has been assessed, based on the proposed development layout and the measured noise levels. Where the analysis indicates that noise may be a determining factor, mitigation measures have been proposed to ensure satisfactory living conditions are capable

of being met. It is therefore considered that, noise does not present a constraint to the residential development of this site in its currently proposed form’.

6.5.10 In addition, supporting external plant has been positioned to the rear of the building at first floor level. The plant has been assessed and will be able to meet the Council’s required noise criteria so as not to impact upon nearby residential amenity.

6.5.11 The proposal is therefore considered to be supportive of and accord with the requirements of Local Plan Policy A4 (Noise and Vibration).

### **Air Quality Assessment**

6.5.12 The proposal is located within the Borough’s Air Quality Management Area which requires development to demonstrate that it will not unduly impact upon the existing air quality of the Borough. The proposal is not considered to detrimentally impact upon the local area’s or wider Borough’s air quality but suitable mitigation will be provided during future construction works to limit dust particles to sensitive receptors.

6.5.13 In support of the application, an Air Quality Assessment has been completed by consultants Entran Limited to support the application. The report concludes as follows:

*“An air quality assessment has been carried out to assess the impact of the construction phase and determine the likely exposure of future occupants of the Proposed Development*

*It is concluded that air quality does not pose a constraint to the development of the Site as proposed, either during construction or once operational”.*

6.5.14 The proposal is therefore considered to be supportive of and in accordance with Local Plan Policy CC4 (Air quality) in minimising any adverse impacts on existing and future residential amenity in terms of air quality.

### **Sustainability and Energy**

6.5.15 Whilst the application scheme would not be a ‘major application’ or meet local policy threshold of five units or more thereby requiring a full energy assessment, the proposal has been designed to respect the local and wider environmental objectives for the implementation of energy efficient technology and sustainable forms of construction techniques.

6.5.16 The development has been designed to ensure it meets the requirements of Building Regulations Part L (Conservation of fuel and power) thereby ensuring that each flat requires as little energy as possible to build and use. Part L specifically requires that new buildings limit heat gains and losses through the proposed building fabric and use of energy efficient heating and hot water services.

6.5.17 The development would further seek to minimise the use of mains water by incorporating water saving measures and equipment and limit water consumption to 105 litres or less per head per day in accordance with London Plan Policy 5.15 (Water Use and Supplies) and the Mayor’s Housing SPG ‘Standard 37’.

6.5.18 The proposal is therefore considered to be supportive of and accord with the requirements of Local Plan Policy CC2 (Adapting to climate change) to limit future energy use and ensure sustainable development.

## 6.6 Transport and Servicing

6.6.1 National planning policy seeks development to actively manage patterns of growth and make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

6.6.2 Local Plan Policy D1 (Design) seeks new developments to be planned which promotes health. Policy T2 (Parking and car-free development) supports developments with a priority for walking and cycling, whilst maximising the use of public transport and minimising car use.

### **Car and Cycle Parking**

6.6.3 It is proposed that the development will be car free, utilising the existing transport network which serves Gray's Inn Road and the immediate area. This approach has been supported by officers as part of the pre-application process with the development being subject to a Section 106 Agreement to ensure the future residential units will be 'permit free'. This is further fully supported by Policy T2 (Parking and car-free development) of the local plan and is considered appropriate given the public transport accessibility of the area (PTAL- 6b) and the aspirations to reduce car travel across the Borough and London.

6.6.4 To promote sustainable travel, each residential unit will be able to secure cycles internally within each unit by using the proposed lift to provide level access.

### **Servicing**

6.6.5 The proposal would include all servicing be undertaken from Grays Inn Road. All refuse collections would take place from the kerbside as per the existing arrangements and in-keeping for nearby properties.

## 7.0 Conclusion

7.1.1 In summary, the current proposals will create a cohesive and sustainable development for the future occupation and use of the building, whilst importantly retaining the historic character of the existing Victorian façade. The proposals have been design to optimise the existing building layout and provide a better quality of space for both future residential and commercial tenants.

7.1.2 The proposals would have consideration of those previously approved schemes on the application site and adjoining premises and is considered to be supportive of Local Plan policy as detailed in this Statement.

7.1.3 The redevelopment of the existing building would therefore secure a number of planning benefits, which include

- The viable and sustainable use of an existing outdated building in need of redevelopment;
- A contribution towards priority housing for the Borough in a sustainable location with high quality living accommodation;
- A financial contribution towards the delivery of affordable housing within the borough;
- The creation of a high quality, comprehensive scheme which restores the front elevation of the historic building and enhances the setting of the conservation area;
- The creation of a good quality active ground floor retail / restaurant frontage to contribute to the vitality and vibrancy of the surrounding street scene;
- Providing an energy efficient building which would contribute to the reduction of carbon emissions and ensure compliance with Building Regulations Part L (Conservation of fuel and power); and
- Promotion of sustainable and public transport modes with zero car parking on site.

7.1.4 The proposed development represents a unique opportunity to redevelop a vacant and underused site to provide for priority, good quality housing and high quality. The overarching objective for the scheme is to allow for a high quality, residential led development which provides for an improved ground floor retail provision and would importantly, preserves the overall external character of the building and surrounding conservation area. The application scheme would accord with the policy guidance set out within the National Planning Policy Framework, and accords with the development plan policies of the London Plan and Camden's Local Plan.

7.1.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that determination must be made in accordance with the development plan unless material considerations indicate otherwise. The revised application scheme is in accordance with both the adopted and emerging development plan and planning permission should therefore be granted.

## Appendix 1 – Site Location Plan

## **Rolfe Judd**

Old Church Court,  
Claylands Road,  
London, SW8 1NZ  
T +44 (0)20 7556 1500

[www.rolfe-judd.co.uk](http://www.rolfe-judd.co.uk)