



**31-32 & 33-34 ALFRED PLACE**

**PLANNING STATEMENT**

**May 2022**

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## 1.0 INTRODUCTION

1.1. This Planning Statement has been prepared by DP9 Limited and is submitted in support of a planning application for full planning permission on behalf of Knighton Estates Ltd. (the “Applicant”) for the property at 31-32 and 33-34 Alfred Place, London, WC1E 7DP.

1.2. The planning application seeks full planning permission for:

*“Alterations to the existing building, including revised office entrances at ground floor level, a new lift overrun, new roof top plant enclosure at roof level and an accessible roof terrace at seventh floor level and all associated works.”*

1.3. The above proposals are referred to in this Statement as “the Development”.

1.4. This Statement assesses the planning considerations associated with the Development in the context of national, regional and local planning policy and guidance. Section 5.0 of this Statement provides an overview of the main planning policy and guidance documents relevant to an assessment of the Development

1.5. The application comprises the following documents which form part of the application:

- Signed and dated planning application forms including Certificate B,;
- Site Location Plan ref. 21-015-P001 B, prepared by Ben Adams Architects
- Existing drawings, prepared by Ben Adams Architects:
  - Drawing ref. P002 B: Site Plan;
  - Drawing ref. P099 B: Existing Basement Plan;
  - Drawing ref. P100 B: Existing Ground Floor Plan;
  - Drawing ref. P101 B: Existing First Floor Plan;
  - Drawing ref. P102 B: Existing Second Floor Plan;
  - Drawing ref. P103 B: Existing Third Floor Plan;
  - Drawing ref. P104 B: Existing Fourth Floor Plan;
  - Drawing ref. P105 B: Existing Fifth Floor Plan;
  - Drawing ref. P106 B: Existing Sixth Floor Plan;
  - Drawing ref. P107 B: Existing Seventh Floor Plan;
  - Drawing ref. P120 B: Existing Alfred Place Elevation;
  - Drawing ref. P121 B: Existing Rear Elevation;
  - Drawing ref. P130 B: Existing Section;
- Proposed drawings, prepared by Ben Adams Architects:
  - Drawing ref. P199 B: Proposed Basement Plan;
  - Drawing ref. P200 B: Proposed Ground Floor Plan;

- Drawing ref. P201 B: Proposed First Floor Plan;
- Drawing ref. P202 B: Proposed Second Floor Plan;
- Drawing ref. P203 B: Proposed Third Floor Plan;
- Drawing ref. P204 B: Proposed Fourth Floor Plan;
- Drawing ref. P205 C: Proposed Fifth Floor Plan;
- Drawing ref. P206 B: Proposed Sixth Floor Plan;
- Drawing ref. P207 B: Proposed Seventh Floor Plan / Roof Plan;
- Drawing ref. P400 C: Proposed Alfred Place Elevation;
- Drawing ref. P401 B: Proposed Rear Elevation;
- Drawing ref. P500 C: Proposed Section AA
- Drawing ref. P501 C: Proposed Section BB.
- Design and Access Statement, prepared by Ben Adams Architects;
- Planning Statement, prepared by DP9 Limited;
- Plant Noise Assessment Report and Environmental Noise Survey, prepared by Hann Tucker Associates;
- Fire Statement, prepared by Jensen Hughes.

1.6. This Statement is structured as follows:

- Section 2 describes the Site and its surroundings.
- Section 3 describes the planning history of the site.
- Section 4 describes the Development.
- Section 5 highlights the main national, regional and local planning policy and guidance relevant to the determination of the application.
- Section 6 assesses the Development against relevant policy guidance and key tests.
- Section 7 sets out the conclusions.

## **2.0 SITE AND SURROUNDINGS**

- 2.1. The property is located on the western side of Alfred Place and the immediate surrounding area is mixed in terms of use and character. The site is bound to the east by residential properties and to the west by a large office building, Whittington House. A university building is located to the rear of the site.
- 2.2. The sites lie within the Bloomsbury Conservation Area. The properties are not Listed.
- 2.3. The buildings provide approximately 5,100 sqm (GIA) of office accommodation arranged over basement, ground and seven upper floors.

### 3.0 PLANNING HISTORY

3.1. The key planning applications relevant to the site are set out in the table below.

Site Address	LPA ref.	Description of Development	Decision	Decision Date
33-34 Alfred Place	2017/1689/P	Installation of 6 x air conditioning units in the plant area on the 5 <sup>th</sup> floor	Granted	7 <sup>th</sup> August 2017
31-32 & 33-34 Alfred Place	2016/0883/P	Alterations to the approved external works, namely new free-standing railings to the rear at first and second floor level; alterations to access ramp at ground floor level; new outward opening door on Alfred Place Frontage; and omission of light well and railings to the Alfred Place frontage as amendment to planning permission reference 2015/4464/P dated 08/01/16 (for alterations to existing building, including new shopfronts, roof terraces at 5th and 7th floor levels, ground floor cycle store, creation of lightwell, and rooftop plant, enclosures and ductwork)	Granted	22 <sup>nd</sup> February 2016
31-32 & 33-34 Alfred Place	2015/4464/P	Alterations to existing building, including new shopfronts, roof terraces at 5th and 7th floor levels, ground floor cycle store, creation of lightwell, and rooftop plant, enclosures and ductwork.	Granted	4 <sup>th</sup> August 2015

## 4.0 THE PROPOSALS

- 4.1. The development includes minor external alterations to and the refurbishment of the existing building. There are also a number of internal refurbishment works not requiring planning permission.
- 4.2. As set out in the accompanying Design and Access Statement, the aspiration for the project is to substantially enhance the building to create high quality commercial floor space and includes the following alterations:
- Revised main and secondary entrances in keeping with the new landscaping to the public realm;
  - New roof lights into the basement within the existing undercroft at ground level;
  - Relocated plant and enclosures on the 7th floor roof to create a new accessible roof terrace for use by office tenants;
  - Incorporation of a new fire fighting lift within the 31-32 Alfred Place staircore as a consequence of the occupiable roof terrace on the 7th floor;
- 4.3. Following on from the works carried out under the 2015 planning permission, this application seeks to improve the building by achieving the following objectives:
- Better link the basement and ground floor office levels, maximising daylight at basement level;
  - Provide a stronger connection with the recently completed Alfred Place Gardens adjacent to the building;
  - Modifications to ground floor facade to open up building to recently completed Alfred Place Garden;
  - More efficient use of existing roof terrace to allow tenants to use these areas as breakout space.
- 4.4. For further details please refer to the submitted drawings and Design and Access Statement.

## 5.0 PLANNING POLICY

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when making any determination under the Planning Acts, it should be done so in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2. The Development Plan for the Site comprises the London Plan (2021), The Camden Local Plan (2017) and the Fitzrovia Area Action Plan (AAP) (2014).
- 5.3. The National Planning Policy Framework (NPPF) was published on 27 March 2012 and updated in 2021. The NPPF sets out the Government's economic, environmental and social planning policies and is to have immediate effect on all planning decisions.
- 5.4. At the heart of the NPPF is a presumption in favour of sustainable development, which means approving development proposals that accord with the development plan without delay, and where there are no relevant development policies or the policies which are most important for determining the application are out of date, grant permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development.
- 5.5. The NPPF is a material consideration when making a determination under the Planning Acts.
- 5.6. The London Plan sets out the strategic plan for London, and encompasses the Mayor's economic, environmental, social and transport objectives for London over the next 20 years.
- 5.7. Camden Council's Planning Guidance Documents are also a material consideration and their content has informed this planning application.

### Site Designations

- 5.8. The Site is identified within Camden Council's Policies Map (2017) as having the following designations:
  - Conservation Area
  - Central London Area
  - Fitzrovia Area Action Plan



## 6.0 PLANNING POLICY ASSESSMENT

- 6.1. The purpose of this Section is to assess the Development against key national, regional and local planning policy and guidance relevant to the determination of the application, and which the proposals have had regard to during design development.

### **Principle of Development**

- 6.2. London Plan Policy E2 ‘Providing suitable business space’ sets out that all commercial space should be designed to be flexible to accommodate a range of employment uses.
- 6.3. Policy E1 ‘Economic development’ of the Camden Local Plan (2017) states that improvements to the quality, flexibility and adaptability of office and commercial space of different sizes should be supported. Policy E2 ‘Employment premises and sites’ seeks to protect existing premises and encourages the provision of employment premises and sites in the borough.
- 6.4. The continued use and refurbishment of office accommodation on the site is in line with Camden’s keys aspirations for the borough which includes promoting a strong economy, as set out in the Local Plan.
- 6.5. The development seeks to modernise and improve the overall appearance, of the office accommodation by bringing it in line with modern tenant expectations. The development seeks to enhance the existing facilities through increasing and enhancing the outdoor amenity facilities within the site. This is directly in accordance with the requirements of Local Plan Policy E1.
- 6.6. The provision of the roof terrace is considered appropriate in this central location, as established by the planning permission granted in 2016 (2015/4464/P). This planning permission established the principle for *“roof terraces at 5<sup>th</sup> and 7<sup>th</sup> floor levels”*, as set out in the description of development.
- 6.7. The roof terrace now proposed in this application would provide additional amenity space for office occupiers which can be used for wellness activities, additional meeting space and to access fresh air and sunshine. This would bring the office space in line with modern working tenant requirements to make the workplace a better quality environment post the Covid-19 pandemic.
- 6.8. As set out in the following sections of this planning statement, there would be limited harm to nearby residential amenity, and the terrace would provide high quality, private outdoor amenity space, improving the accommodation available to the occupiers.

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## **Design**

- 6.9. Camden Local Plan Policy D1 sets out that new development should deliver high quality design.
- 6.10. The Fitzrovia Area Action Plan (AAP) asserts that ground floor uses should create safe, attractive streets by fronting active uses or windows and entrances to the street.
- 6.11. The Fitzrovia AAP sets out design principles for the Alfred Place character area, which the site lies within. One of the principles includes new development improving the frontage and pedestrian environment.
- 6.12. The proposals seek to provide office accommodation of the highest quality internally and externally and improve the functioning of the building. The proposals aim to secure the long-term future use of the site, by ensuring it is attractive, sustainable and functional. The external modifications are very minor in nature and are similar to those works granted under the planning permission in 2015.
- 6.13. The proposed works will enhance the character of the existing building and be of the highest quality design, in accordance with national, regional and local policy requirements. The new ground floor frontage will activate the streetscape, in line with Policy DP1 and the Fitzrovia AAP.
- 6.14. To reiteration, planning permission 2015/4464, as amended by 2016/0883/P sets a precedent in design terms as the application sought to provide external amenity space at fifth and seventh floor levels and also provide light and open ground floor frontages to maximise visual permeability and engage with the public realm. These principles, which have been established by the previous planning permission and accord with the objectives of this application, which include promoting an active frontage at ground floor level and providing valuable amenity space for users of the building.

## **Heritage**

- 6.15. Local Plan Policy D2 seeks to preserve, and where appropriate, enhance Camden's heritage assets and their setting.
- 6.16. In relation to small scale non-residential development, such as this development, the Bloomsbury Conservation Area Appraisal (2011) requires attention to detailed design and high quality smaller alterations. The Appraisal asserts that small but insensitive changes can harm the character and appearance of the area to an extent belied by their individual scale.
- 6.17. The Bloomsbury Conservation Area Appraisal describes 31-32 and 33-34 Alfred Place as "neutral elements in the streetscape".

- 6.18. The existing building is not noteworthy or of any particular merit and makes a “neutral” contribution to the Conservation Area. This development presents an opportunity to make better use of the existing building and improve the ground floor frontage, which currently presents an inactive frontage to the street. The proposed alterations are very minor in nature and the upgrading of the ground floor would improve the appearance of the building and enhance the conservation area.
- 6.19. These proposals are therefore in accordance with the requirements of Local Policy D2 in presenting an opportunity to improve the functionality of the existing building, enhance the building’s contribution to the character of the Conservation Area whilst ensuring its long term sustainable use as office accommodation.

### **Amenity**

#### *Privacy and Overlooking*

- 6.20. Camden Local Plan (2017) Policy A1 ‘Managing the impact of development’ seeks to protect the quality of life of occupiers and neighbours by granting permission for development that do not cause unacceptable harm to amenity. This includes protecting visual privacy and outlook.
- 6.21. Policy C1 ‘Health and wellbeing’ sets out that the Council will improve and promote strong, vibrant and healthy communities. Measures that will help contribute to healthier communities and reduce health inequalities must be incorporated in a development where appropriate.
- 6.22. The accessible terrace will provide valuable amenity space for the users of the building. The terraces have been sensitively designed and positioned to ensure that the impact upon the amenities of residential occupiers is minimised and that there will be no overlooking to residential properties.
- 6.23. Again, the principle of a terrace at 7<sup>th</sup> floor has been established under the previous planning permission for the building.

#### *Noise*

- 6.24. Policy A4 ‘noise and vibration’ identifies that the Council will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity.
- 6.25. The ‘Plant Noise Assessment Report and Environmental Noise Survey’, prepared by Hann Tucker Associates, provides an assessment of the background noise survey and also an assessment of the specific plant equipment proposed to be located on the building.

- 6.26. The assessment concludes that the proposed plant, in conjunction with the proposed attenuation measures, should achieve the Council's noise criteria at the nearest residential window and therefore will not have a detrimental impact on amenity.

### **Fire Safety**

- 6.27. Policy D12 of the London Plan requires that all development proposals must achieve the highest standards of fire safety and all major development shall be supported by a Fire Statement.
- 6.28. London Plan Policy D5 'Inclusive Design' requires development to incorporate safe and dignified emergency evacuation for all building users, by as independent means as possible. In all developments where lifts are installed, Policy D5 requires as a minimum at least one lift per core to be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- 6.29. The development is not classes as 'major development', however, the London Plan sets out that refurbishment schemes that require planning permission will be subject to London Plan policy.
- 6.30. The planning application is supported by a Fire Statement, prepared by Jensen Hughes, which provides details of how the site achieves the required level of fire safety by means of egress, internal fire spread structure, external fire spread and firefighting access.
- 6.31. In addition to meeting the requirement of Policy D5 of the London Plan, it is proposed that the lift to stair core 1 will be designed as a firefighting and evacuation lift. This will allow the lift to be used as part of the evacuation strategy prior to the arrival of the fire and rescue service. The lift will be operated under the control of the fire safety manager or by someone trained and authorized in the use of the lift. This approach is in line with BS 9999 guidance.
- 6.32. Overall, the proposed development accords with the relevant fire safety standards and inclusive access requirements set out by Policies D12 and D5 of the London Plan.

## 7.0 CONCLUSIONS

- 7.1. The Development seeks to undertake minor external alterations in connection with the refurbishment of the building in order to markedly improve the quality of the commercial floorspace.
- 7.2. The proposed works are similar to those granted planning permission in 2015 which also included a roof terrace at roof level. The works have been designed having regard to national, regional and local planning policy and guidance and fully accords with all levels of policy.
- 7.3. The Development will provide a significant number of benefits which are outlined below:
- Optimising the potential of the site and securing its long-term use as successful office accommodation, in accordance with Local Plan Policy E1;
  - The provision of high quality office accommodation, in line with the requirements of Policy G1 and D1 as well as national and London Plan policies;
  - Enhancing the existing offer which will appeal to a wider range of commercial tenants;
  - The accessible terrace will provide valuable amenity space for the users of the building and make the office floorspace more marketable to ensure it is brought into use and provides jobs into the local economy;
  - Improving the attractiveness of the building through a creating an active ground floor frontage, enhancing the Conservation Area;
  - Enhancing the external appearance of the building with the provision of a plant enclosure, and;
  - Ensuring the amenity of neighbouring occupiers is not materially harmed.
- 7.4. For the reasons outlined in this Statement, the proposed works comply with relevant national and local planning policy and should be granted planning permission.