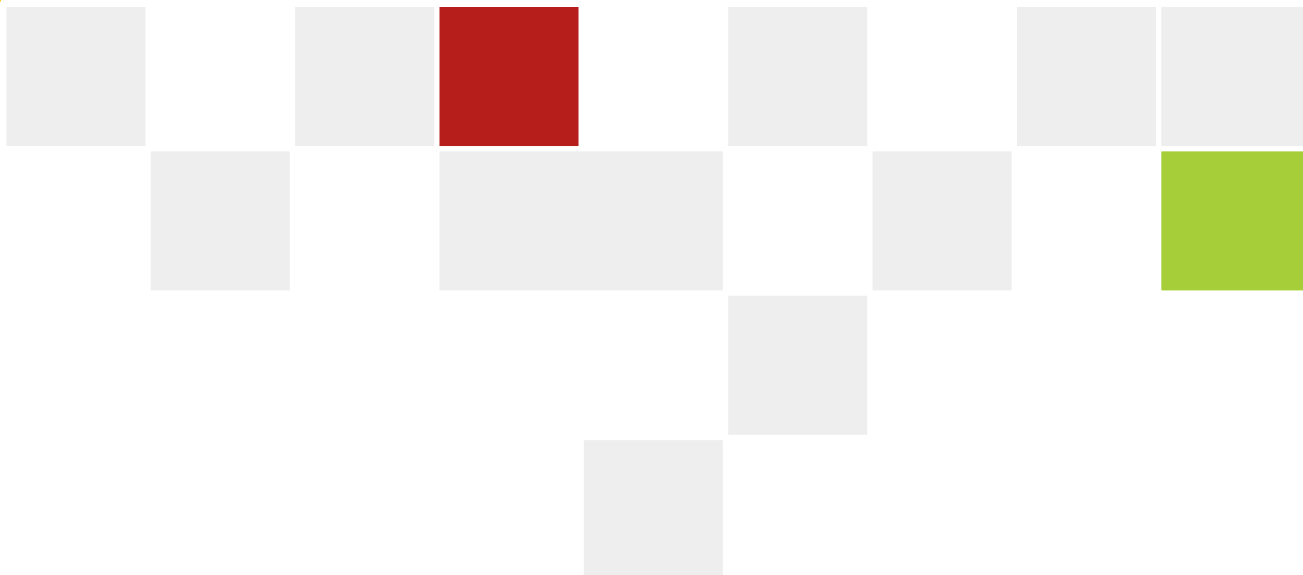


12 Adeline Place

Planning Statment



Boyer

Report Control

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1. INTRODUCTION

- 1.1 Boyer have been instructed by our client, Coley Wright Ltd, to prepare and submit a full planning application in respect of the property at 12 Adeline Place, London WC1B 3AJ ('Site').
- 1.2 This application seeks full planning permission for the:

Change of use of raised ground floor from office (Class E) to residential (Class C3) and repair and refurbishment of windows.
- 1.3 This Planning Statement ('Statement') sets out why the proposal is considered acceptable in planning terms and why it should be supported by the Council.
- 1.4 In terms of structure, this Statement will provide a summary of the Site and its history before examining the planning justification for the proposal. Against this background, this Statement addresses the following:
 1. Site and Surroundings;
 2. Planning History;
 3. Proposed Development;
 4. Planning Policy; and
 5. Planning Justification.
- 1.5 This Statement concludes that the proposed development is compliant with all relevant planning policy and is therefore considered acceptable in principle and, as such, planning permission should be granted without delay.

2. SITE AND SURROUNDINGS

- 2.1 The Site forms part of Bedford Court Mansions, a 5 storey red brick building which is understood to have been constructed in the 1890's. The building sits at the junction of Bedford Avenue and Adeline Place. The Site itself is situated on the raised ground floor level.
- 2.2 With the exception of the Site, which is currently in office (Class E) use, the block is fully in residential (Class C3) use.
- 2.3 The majority of flats are accessed via a communal entrance on Bedford Avenue. However, the Site benefits from its own entrance from the street.
- 2.4 Buildings of a similar style and appearance to Bedford Court Mansions are situated along Bedford Avenue. On the opposite side of Adeline place is a modern 8 storey building with underground car park, which is understood to house a number of commercial uses including restaurants.
- 2.5 The Site is not listed however, it does fall within the Bloomsbury Conservation Area.
- 2.6 The Site benefits from a PTAL score of 6b meaning it has an excellent accessibility level. Tottenham Court Road Underground Station is located approximately 170m to the south of the Site and Goodge Street Underground Station is approximately 430m north of the Site. There are also a number of bus stops within easy walking distance.
- 2.7 The Site falls within Flood Zone 1 meaning it has a low probability of flooding.

3. PLANNING HISTORY

- 3.1 A desktop review of the Council's planning application database has been conducted.
- 3.2 An application (Ref: 2020/2658/P) for the *change of use of raised ground floor flat from Office (Class B1a) to Residential (Class C3) and replacement of steel windows to provide 1 x 3-bed flat* was submitted to the Council in September 2020.
- 3.3 However, the application was subsequently withdrawn. It is understood that this application was withdrawn as no marketing report was submitted as part of the suite of documents. As discussed further on in this Statement, a comprehensive and robust Marketing Report has been submitted as part of this application in response to the Council's concerns in regards to the previous 2020 application.
- 3.4 In June 2014 an application (Ref: 2014/0033/P) for the *replacement of single glazed steel windows with double glazed aluminium framed windows, installation of entrance uplighters, refurbishment to communal entrances and signage* for Bedford Court Mansions was approved.

4. PROPOSED DEVELOPMENT

- 4.1 This application seeks full planning permission for the *change of use of raised ground floor from office (Class E) to residential (Class C3) and repair and refurbishment of windows.*
- 4.2 The proposal will deliver a high quality, dual aspect, 3 bedroom flat that exceeds minimum space standards to ensure a good quality of living for future occupiers.
- 4.3 Each bedroom will benefit from its own en-suite, with bedroom 3 having the flexibility of either being a bedroom or living space, depending on the needs of the future occupier. The flat will also provide a spacious kitchen/dining/living area and a large main bathroom.
- 4.4 As part of the conversion, all existing original features will be preserved where possible. In rooms that have seen false ceilings installed, these will be removed to return to a full-height setting. Coving, skirting, architrave and panelling will be reinstated to match original examples found in the property.
- 4.5 The proposal will therefore greatly improve the internal setting of the Site and ensure that it does not fall in a state of disrepair.
- 4.6 In addition, the proposal also seeks to repair and refurbish the existing timber windows. This will make them suitable for modern living by introducing double glazing. However, it is important to note that the refurbishment will not alter the style of the windows and so there will be no noticeable change to the external appearance of the building.
- 4.7 The proposed development is considered to be in line with all relevant policy and as such, planning permission should be granted without delay.

5. PLANNING POLICY

5.1 Section 38(6) of the Planning and Compulsory Purchase Act requires that an application for planning permission is determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.2 The Development Plan for the Site comprises:

- Camden Local Plan (2017)
- London Plan (2021)

Camden Local Plan (2017)

5.3 Policy H1 confirms that the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing. Amongst other things, the Council will achieve this by expecting the maximum reasonable provision of housing in sites that are vacant or underused.

5.4 In regards to economic development, Policy E1 advises that the Council will secure a successful and inclusive economy by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.

5.5 Policy E2 relates to employment premises and sites and states that the Council will protect premises or sites that are suitable for continued business use. The Council will resist development of business premises and sites for non-business use unless it can be demonstrated to the Council's satisfaction that:

- a. The site or building is no longer suitable for its existing business use; and
- b. 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.

5.6 Paragraph 5.39 of the Local Plan states that 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. The applicant must submit evidence of a thorough marketing exercise, sustained over at least two years.

5.7 In terms of design, Policy D1 confirms that amongst other things, development should respect the local context and character and preserve the historic environment.

5.8 With regards to Conservation Areas, Policy D2 advises that development within Conservation Areas should preserve, or where possible, enhance the character and appearance of the area.

London Plan (2021)

- 5.9 Policy D6 confirms that housing development should be of a high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners.
- 5.10 In regards to offices, Policy E1 confirms that providing there is no need for the continued employment use of surplus office space, its redevelopment to other uses including housing will be supported.

Other Material Considerations

National Planning Policy Framework (NPPF) (2021)

- 5.11 The NPPF sets out the Government's objectives for the planning system; to achieve sustainable development through economic, social and environmental gains, and to secure economic growth. At the very heart of this presumption is the acknowledgement that growth is necessary to enable the country's and its communities to support themselves. Growth and development must happen in order to accommodate the needs of a growing population, which will result in change to the country, its cities and neighbourhoods. That change will have impacts, and it must be acknowledged that only unsustainably harmful impacts should stand in the way of planning permission for new development being granted. Development must not be prevented simply because it will cause change.

6. PLANNING JUSTIFICATION

Principle of Development

- 6.1 National, regional and local planning policy support the provision of residential units in appropriate locations. A primary objective of national planning policy is to require housing developments to be considered in the presumption in favour of sustainable development.
- 6.2 As has been discussed in preceding sections of this Statement, the Site is the only unit within Bedford Court Mansions that is not in residential use. Therefore, it is considered to represent something of an anomaly.
- 6.3 Given that the majority of Bedford Court Mansions is in residential use, the principle of residential development at the Site has long been established and should therefore be supported by the Council.
- 6.4 It should also be noted that the Council had no in principle objection to the 2020 withdrawn application (Ref: 2020/2658/P). The reason for withdrawal was so that the applicant could conduct a through marketing exercise in accordance with the provisions outlined in Camden Local Plan Policy E2. This marketing exercise is discussed in detail under the proceeding subheading.

Loss of Employment Space

- 6.5 Camden Local Plan Policy E2 allows for the change of use to non-business uses provided that it has been demonstrated that:
 - a. The site or building is no longer suitable for its existing business use; and
 - b. 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.
- 6.6 Supporting paragraph 5.39 states that the applicant must submit evidence of a thorough marketing exercise that has been sustained over a period of at least two years.
- 6.7 In response to this requirement, this application is supported by a Marketing Report, prepared by Gale Priggen + Co, which confirms that they were instructed to market the Site for either a commercial leasehold or for outright sale as a self-contained office property in January 2021.
- 6.8 As detailed within the accompanying Marketing Report, the Site was marketed for a rent of £62,000 per annum, which Gale Priggen + Co consider to be competitive and in line with market trends. In order to attract the maximum number of enquires, a lease for a term arrangement was offered.

- 6.9 In terms of marketing the Site, Gale Priggen + Co prepared a PDF of letting particulars and a dedicated microsite (details of which are available in the Marketing Report). Separate particulars were prepared in relation to the disposal option. Both sets of particulars were published on the main inter-agents' agency database and marketing portal, AgentInsight, on 01st February 2021.
- 6.10 Gale Priggen + Co included a listing on their website from the end of January, which included downloadable details and floor plans. Details were sent automatically to all registered applicants seeking commercial leasehold or freehold/long leasehold disposals at the same time.
- 6.11 As evidenced within the Marketing Report, a total of 30 match requests were sent in relation to commercial leasing enquires. However, there were no inspections and only 4 enquires. With regard to purchase enquires, a total of 11 match requests were sent and there were 2 inspections and 4 enquires.
- 6.12 Throughout the marketing period, just one offer was received, from a private doctor's surgery that was seeking a more central location. Following a period of negotiation, terms were agreed for a sale of the long leasehold. However, despite solicitors being instructed and contracts issued, the perspective purchaser withdrew from the transaction. Despite several enquires, no proper reason was given for the withdrawal from the proposed purchaser. Following this, the property was immediately remarketed.
- 6.13 Gale Priggen + Co advise that they believe that there has been a steady increase in the availability of commercial offices over the marketing period, which has had a negative impact in efforts to secure a tenant or purchaser for the Site.
- 6.14 The slow return of tenants to the office environment following the COVID pandemic is also considered to have had an impact on finding a tenant or purchaser for the Site due to a reduced demand for commercial premises.
- 6.15 Therefore, in response to criteria a. of Policy E2, given the Site's location within an almost entirely residential building, the continued business use is not considered appropriate or conducive to the building's primary use as a residential development.
- 6.16 The Marketing Report comprehensively and robustly demonstrates that there is very little possibility of retaining or redeveloping the Site for similar or alternative business uses and thus, criteria b. of the Policy is satisfied.
- 6.17 Policy confirms that the change of use of business uses to non-business uses will be supported provided the criteria outlined in Policy E2 are met and if there is marketing evidence that demonstrates that there is no realistic prospect of demand to use the site for an employment use. Further details can be found in the accompanying Marketing Report.
- 6.18 As outlined above, the proposal clearly meets with criteria a. and b. of Policy E2 and the application is supported by a robust Marketing Report, which clearly demonstrates that there is no need for realistic prospect of the Site's continued employment use.

- 6.19 In light of the above, the change of use from office to residential is considered acceptable and should be fully welcomed by the Council.

Impact on Conservation Area

- 6.20 Whilst not listed, Bedford Court Mansions does fall within the Bloomsbury Conservation Area.
- 6.21 Local Plan Policy D2 advises that development within Conservation Areas should preserve, or where possible, enhance the character and appearance of the area, and resist the total or substantial demolition of an unlisted building that makes a positive contribution to the overall setting of the Conservation Area.
- 6.22 It is important to note that this application primarily concerns internal alterations that will allow the existing office to be transformed into a residential dwelling, in line with the rest of the units in the block.
- 6.23 With regard to the repair and refurbishment of the existing windows, this will not result in any change to the current style or appearance of the windows.
- 6.24 As such, there will be no impact on the building's contribution to the setting of the Conservation Area. Therefore, the proposal is considered fully acceptable and justified in heritage terms.

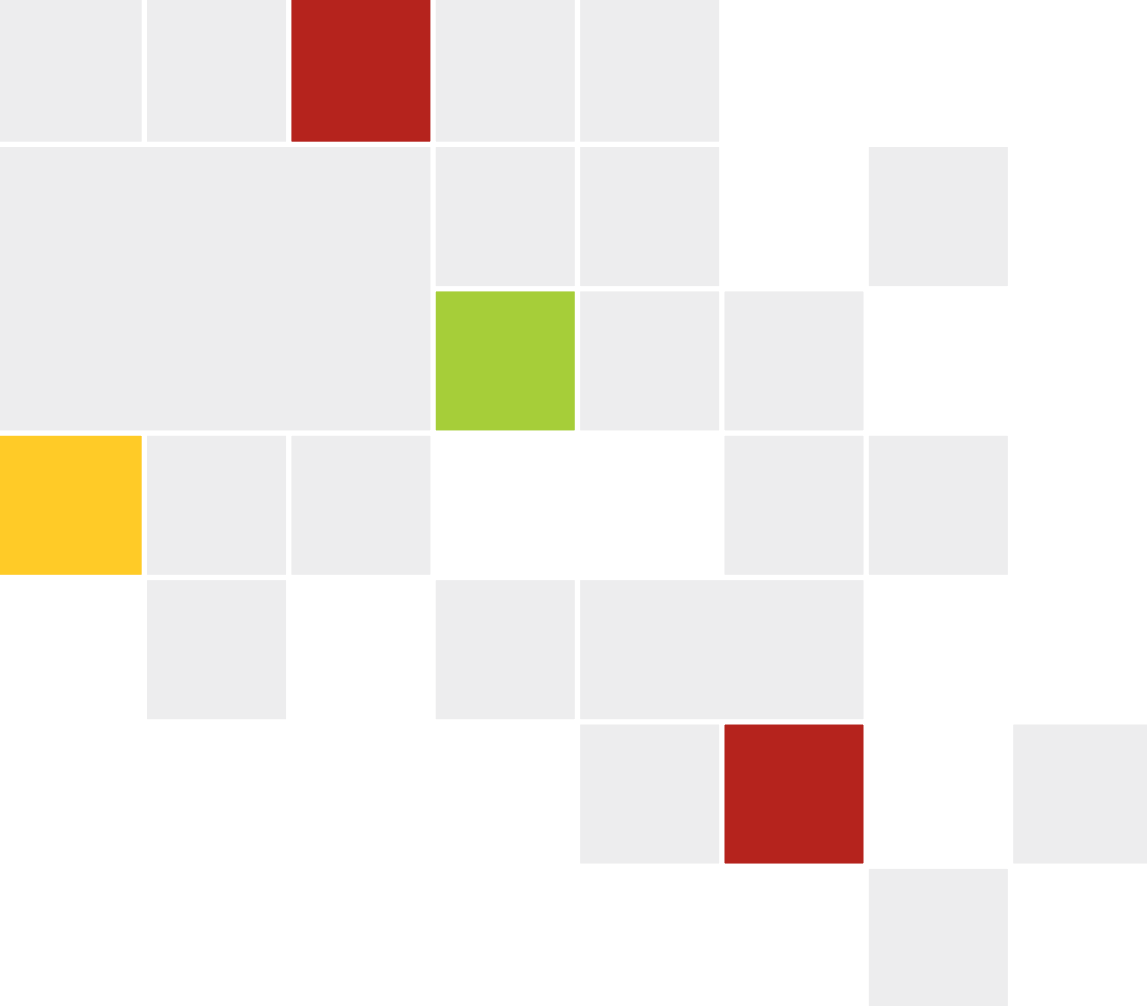
Class MA Permitted Development

- 6.25 Whilst a full planning application is being made for the change of use of the Site from office to residential, we consider that the Site can benefit from Class MA Permitted Development, which allows for the change of use from Class E to residential.
- 6.26 It is acknowledged that the Site is subject to a current Article 4 Direction, which removes Class O Permitted Development Rights, which allowed for the change of use from offices (Class B1a) to residential (Class C3). However, Class O and any Article 4 Directions relating to Class O expire on 31st July 2022.
- 6.27 As the current Article 4 Direction will expire on 31st July 2022, should a Prior Approval application for Class MA be made after this date, given that the Site meets all the tests outlined in the legislation, Class MA prior approval should be granted.
- 6.28 In light of the above, it is considered that a Prior Approval application for Class MA is a valid "fall back" position.

7. CONCLUSION

- 7.1 This Planning Statement has been submitted on behalf of our client, Coley Wright Ltd, for the *“change of use of raised ground floor from office (Class E) to residential (Class C3) and repair and refurbishment of windows.”*
- 7.2 The key consideration in this application is the loss of the current employment floorspace to a residential use. Whilst policy is generally protective of employment floorspace it does allow for its change of use to a non-business use (including residential) providing certain criteria are met. These criteria include that the site is no longer suitable for business use and that the possibility of retaining, reusing or redeveloping the site for similar or alternative business use has been fully explored.
- 7.3 As discussed within Section 6 of this Statement, a comprehensive marketing campaign has been undertaken in respect of the Site by Gale Priggen + Co. This marketing exercise commenced in January 2021 and has been ongoing since that date. The Site has been marketed at an appropriate price and whilst a number of enquiries were received, none of these came to fruition.
- 7.4 In light of this, there is robust and conclusive evidence that there is no real possibility of the Site's continued business use and there is no market demand for such a Site by business operators. Further to this, the Site is the only non-residential use in a residential block and so its change of use to residential is considered acceptable and the principle established.
- 7.5 The proposal therefore meets with all relevant policy requirements for the change of use to residential and should therefore be supported by the Council.
- 7.6 As previously discussed, it is felt that there is an opportunity for the Site to apply for the change of use from Class E to residential via Class MA permitted development. Whilst a current Article 4 Direction is in place that removes permitted development rights to change between office (Class B1a) and residential (Class C3), this Article 4 expires on 31st July 2022. Once this date has passed, the Site will be eligible for to apply for prior approval for Class MA permitted development. This therefore constitutes a “fall back” position for the Site.
- 7.7 Notwithstanding this “fall back” position, the accompanying Marketing Report comprehensively concludes that there has been no real interest in the continued use of the Site for business purposes and that there is no realistic prospect of a business operator coming forward for the Site in the future.
- 7.8 With regard to the replacement windows, the replacement of the timber windows are on a like-for-like basis and so there will be no noticeable change to the building's external appearance. The replacement windows will be double glazed which will offer occupiers an increased level of security and amenity in terms of cancelling outside noise.
- 7.9 With regard to the repair and refurbishment of windows, as detailed above, this will not result in any change to the style or appearance of the windows and so there will be no noticeable impact on the appearance of the host building.

- 7.10 Further to this, the principle of replacement windows has already been established through the 2014 application (Ref: 2014/0033/P) and, thus, the replacement of these windows is considered acceptable.
- 7.11 The proposed development has therefore been shown to be in agreement with all relevant planning policy and will bring a redundant former office unit into a viable residential use. Residential development should be supported where it meets with all relevant Development Plan policies and so the Council is respectfully requested to approve this application without delay.



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