



## Camden Planning Department

7<sup>th</sup> September 2022

Dear Sir/Madam,

**Re: 11 Grenville Street, London, WC1N 1LZ: Change of use of part of Lower Ground Floor (Class E) to a (C3) residential unit under Class MA of the Town and Country Planning, England, (order 2021)**

### 1. The site

11-12 Grenville Street is a four storey terraced building with a commercial unit (Class E) at lower ground floor.

Following a recent planning permission (Ref: 2017/4551/P) dated 28<sup>th</sup> November 2019, the existing upper floors are approved for a change of use to 5no. residential units.

The Ground Floor commercial unit was recently approved under Prior approval application Class MA into C3 residential unit.

The remaining lower ground floor part of the commercial unit has been also vacant for the past year, with no viable interests to be rented or to be purchased.

Existing buildings on Grenville Street are predominantly used for residential or office use, with most properties on the block being residential. The adjoining property towards the North is Downing Court, a detached blocks of 26no. flats, some at Ground and Lower Ground level.

### 2. Proposal

The proposal relates only to part of the Lower Ground Floor.

This Prior Approval application is for converting the existing vacant commercial space (Class E) into 1no. residential unit (Class C3).

By converting the vacant retail space (Class E) into a new residential unit, the entire property will have a coherent and consistent use as a residential building, matching the overall character of the block and the street scene.

This application relates mainly to internal alterations, all designed to add consistency across the building. As such, no additional structures are proposed to be erected to safeguard against any adverse effect on the character of the building or the area. No external changes are proposed.

## **Transport**

*a) transport impacts of the development, particularly to ensure safe site access;*

Currently, there is only one main entrance to all residential units including the lower ground floor commercial unit.

the upper floors are accessed via the communal front entrance of the building.

The proposal is for the new residential unit to use the existing communal entrance at street level. By using the existing entrance, we are ensuring a safe site access directly from the pavement. Therefore, no changes are proposed to access the site.

None of the previously approved residential units in the upper floors of the building have car parking. There is no car parking provision in the site.

The existing Commercial Unit (Class E) can accommodate approx. 2-3 employees, plus customers. However, for over a year, the commercial space has been vacant.

The proposed residential dwelling is expected to have a maximum occupancy of 1 person, being a 1-person unit. This will reduce the potential traffic generated by the development when compared to the existing use.

The application site is in a good central location with a PTAL rating of 6b, the best possible rating. Given the site's proximity to local services and public transport links in the area, it is considered the proposed arrangement would be in accordance with the current London Plan and the NPPF 2019.

It is therefore considered that the proposed change of use is unlikely to generate unacceptable levels of additional traffic.

In terms of car parking the revised NPPF in matters of sustainable development, transport and car parking advises at paragraph 105 that:

*"105. If setting local parking standards for residential and non-residential development, policies should take into account:*

- a) the accessibility of the development;*
- b) the type, mix and use of development;*
- c) the availability of and opportunities for public transport;*
- d) local car ownership levels; and*
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultralow emission vehicles."*

Importantly, Paragraph 109 of the Framework advises that:

*“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*

In terms of the use of parking standards paragraph 106 of the revised NPPF states:

*“106. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). “*

The site is within walking distance of Russell Square and Holborn Underground Stations, King's Cross / St. Pancras rail stations, as well as being well served by several local buses, namely 59, 98, 91, 68, 168, N91 & 188, with bus stops in close proximity (approx. 250m). Considering this, we believe this is a compelling case for a car-free development that we would like to encourage.

To improve the sustainability of the proposed development it is proposed to include secure cycle parking within the proposed flat, as indicated on the submitted plans.

**Considering all the above, we therefore maintain that there are no material issues relating to the proposed change of use on matters of Transport.**

#### **Contamination:**

*(b) contamination risks in relation to the building;*

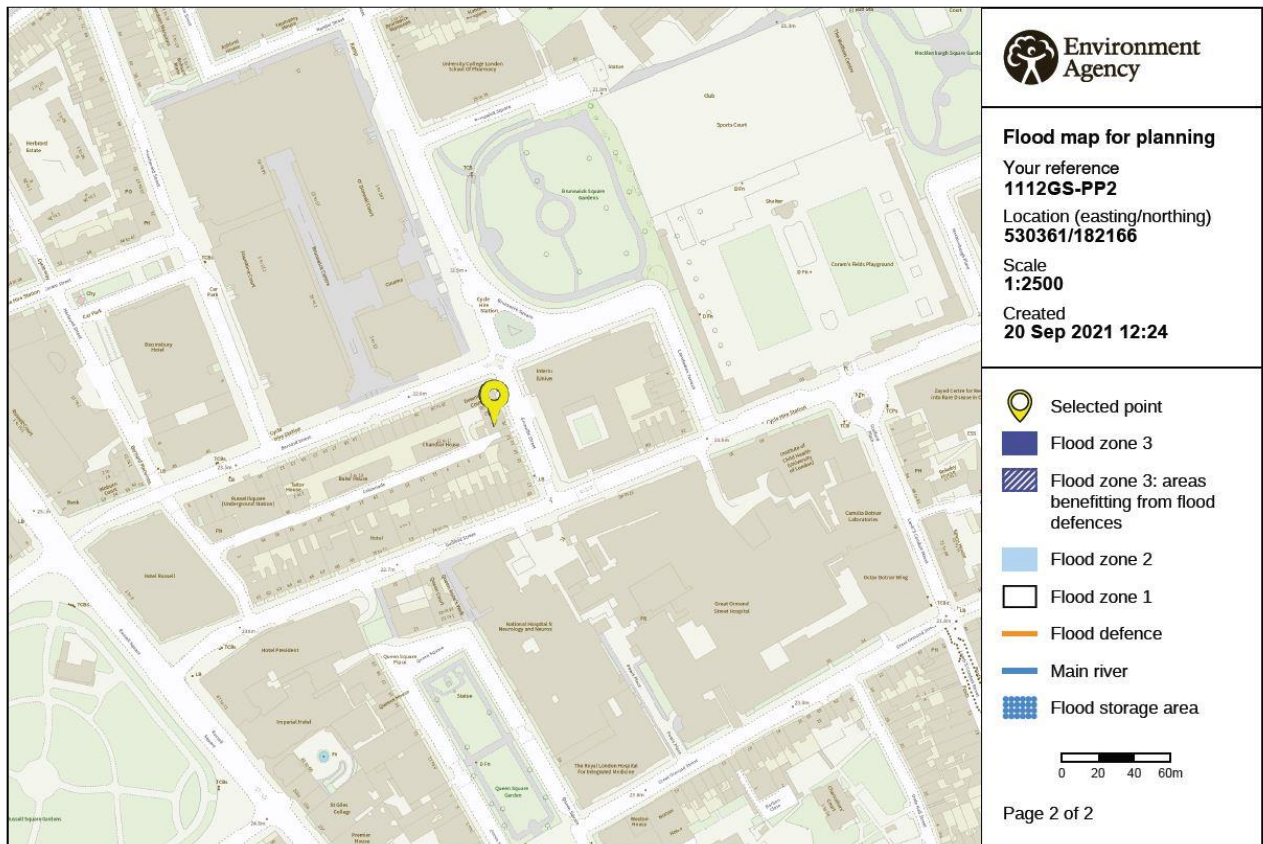
There are no proposed works to the upper floors of the property as part of this application. The proposed change of use will not require any ground works or excavations, being within an existing commercial unit at Lower Ground Floor level. It is therefore considered highly unlikely to expose any soils that may contain contaminants of concern presenting a risk to human health.

**We maintain that there are no material issues relating to the proposed change of use on matters relating to Contamination.**

#### **Flooding:**

*c) flooding risks in relation to the building;*

The site is not in Flood Zones 2 or 3. The application site is in Flood Zone 1 and have a low probability of flooding. See attached copy of the Environment Agency Map and submitted report.



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In this regard and given the overall size of the site and that no additional development is proposed, it is considered that there would be no requirement to undertake a flood risk assessment.

**In light of the above, it is considered that there are no material issues relating to the change of use proposed on matters of flooding.**

**Noise:**

*d) impacts of noise from commercial premises on the intended occupiers of the development;*

Considering there are no commercial premises near the application site, the host building is approved for residential use, and there are existing residential properties at ground floor level in close proximity to the application site, it is considered that there are no material issues relating to the proposed change of use in regards to noise affecting future residents.

**It is therefore considered that there are no material issues relating to the change of use proposed on matters of Noise.**



**Natural light;**

*f) the provision of adequate natural light in all habitable rooms of the dwellinghouses;*

**Please see attached Daylight Report confirming acceptable levels in all proposed habitable rooms.**

**Impact of residential use in heavy industry area;**

*g) the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses;*

The site is located in a quiet area which is predominantly residential. Some of the buildings in the immediate area on the road are fully residential facing the road, with residential units at ground level. There are no heavy industry or distribution facilities in the immediate neighbourhood.

**Considering the above, it is considered that there are no material issues relating to the proposal in this regard.**

We attach to this cover letter all relevant documents for this type of application, for your review. We remain available if you need to contact us with any queries.

Kind regards,

Yossi Shahar  
Director  
Tal Arc Ltd.