

Design & Access and Planning Statement

Site: Lower ground floor and ground floor level, 267 Eversholt Street, London, NW1 1BA

Proposal: Change of use of basement and the rear part of the ground floor from Class E into short-term letting accommodation (5 units).

1.0 Site location

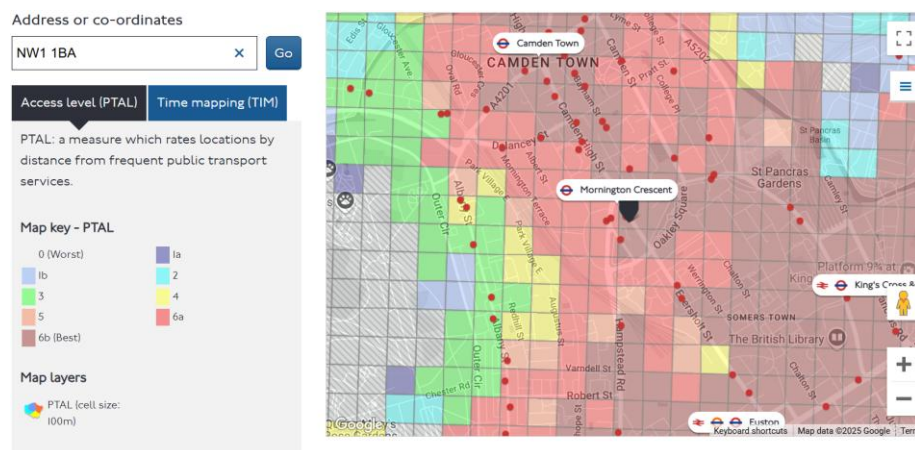
The site is a building situated at the northern end of Eversholt Street and is surrounded by predominantly commercial property with residential above.

The application site building comprises basement, ground and first to fifth floors.

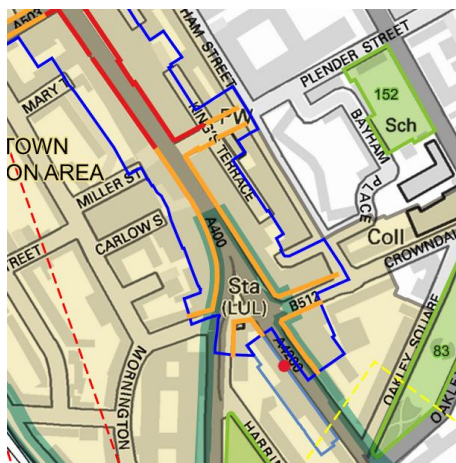
The building is not listed but lies within the Camden Town Conservation Area.

The site is located in very close proximity to Mornington Crescent Underground station.

The site has a Public Transport Accessibility Level (PTAL) rating of 6b, which is the highest PTAL rating – the rating acknowledges the excellent access to public transport in the area. This is demonstrated by the image below.



The site is located on the edge of Camden Town Centre. This is shown in the image below.



2.0 Relevant History

Pre-application advice was provided (planning ref: 2024/4680/PRE, dated 16 December 2024). The pre-application advice was followed up by an addendum to the advice.

A Planning Enforcement Notice was issued 9th February 2024 in regards of the following breach of planning control: “Without planning permission the material change of use of the Property from mixed use consisting of 3 flats (Use Class C3) and 1 commercial unit (Use Class E) to 15 units of temporary sleeping accommodation (Use Class C1) on the ground, first, second, third, fourth and fifth floors, with ancillary concierge/office space on the ground floor (“the Unauthorised Development”).”

Part 8 of the requirements of the Notice stated: “Restore the Property to its previous lawful state, incorporating a Class E commercial premises on the basement and ground floor, and three Council reference: EN23/0394 residential flats in the C3 use on each of the first, second, and third floors, with the fourth and fifth floors being integrated into the flat on the third floor.”

3.0 Planning Considerations.

The main planning considerations are:

- Principle of losing existing commercial floorspace
- Principle of providing short term lets in this location
- Impact on the character and appearance of the property and conservation area
- Impact on neighbouring amenity
- Standard of accommodation
- Highway matters

4.0 Principle of losing existing commercial floorspace

The pre-application advice supported the loss of the commercial space by stating:

“Loss of Class E

The lawful use of the ground and basement floor is Commercial, Business and Service (Class E) with the basement being used for storage.

The proposal would seek to retain 43.31 sqm of retail (Class E) floorspace at ground floor with some storage within the front lightwell at basement level. The remainder of these two floors would be converted into 5 STL accommodation units. It would be considered that this floorspace and location at the front of the ground floor would allow the unit to continue to operate. There would not be an objection to reducing the retail unit down to this size.”

5.0 Principle of providing short term lets in this location

Paragraph 6.10.1 of the London Plan (2021) states: “London is the second most visited city in the world and the Mayor wants to spread economic and regeneration benefits by working with London & Partners to **promote tourism across the whole of the city**, including outside central London. This Plan supports the enhancement and extension of London’s attractions particularly to town centres and well-connected parts of outer London, complemented by supporting infrastructure including visitor accommodation, a high-quality public realm, public toilets and measures to promote access by walking, cycling and public transport.”

Paragraph 6.10.2 states: “Given the importance of tourism to London’s economy, London needs to ensure that it is able to **meet the accommodation demands of tourists** who want to visit the capital. It is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum. In addition to leisure visitors the needs of business visitors require consideration, including provision of suitable facilities for meetings, conferences and exhibitions in both hotels and purpose-built convention and exhibition centres.”

The number of bedrooms sought to be delivered by the London Plan is higher than the levels currently being delivered.

Paragraph 5.56 of the Local Plan states in part: “The London Plan sets a target of achieving 40,000 net additional hotel rooms by 2036 across London. The Working Paper also states that 37% of the expected increase in the number of rooms across Greater London will be met in Westminster, City of London and Camden.”

Part c. of Camden Local Policy E3 states the Council will: “consider tourism development outside of the areas listed above (*town centres*) where it would have a local or specialist focus and would attract limited numbers of visitors from outside the borough.”

The pre-application addendum states this part of the Policy is only applicable to tourism development and not tourist accommodation. It is noted that a planning committee report for a similar recent development (presented to Committee) interpreted the policy otherwise – please refer to next paragraphs for detail. The proposal is also assessed below in relation to the aims of Local Plan policies for town centres and neighbourhood centres.

It is the applicant’s aim that the proposal will contribute to the success and vitality of Camden Town Centre and Eversholt St Neighbouring Centre. The applicant strongly supports the Local Plan’s aims in relation to the vibrancy and success of Camden’s centres and recognises the excellent work the Council has done in recent years to improve the attractiveness of Camden Town Centre. It is the intention of the applicant to support this work and to help the Council achieve these objectives.

The principle of providing a hotel type use in a similar type of location to the application site has been accepted by the planning permission at Nos. 155 & 157 Regent's Park Road, London NW1 8BB. Planning permission was granted 7 December 2022 (planning ref: 2021/0877/P), for: “Demolition of existing building and redevelopment to provide a part 4 storey/part 7

storey building, with two basement levels, for a 59 bedroom hotel, with new street level public realm works in front”

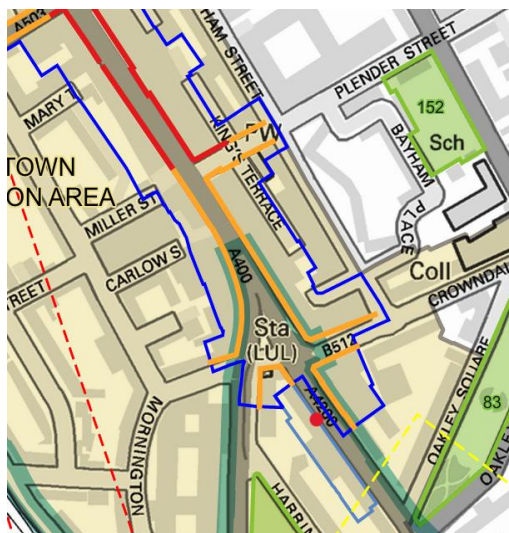
The pre-application addendum stated that the executive summary of the planning committee report (paragraph 6.2.22): “clearly sets out that: “The site is not within the Camden Town Major centre, where policy E3 directs new hotels; however, officers consider the proposed hotel use is acceptable as it is near to the centre and well located for public transport. **Part of the justification for a new hotel relates to the Roundhouse, and this accords with part c of Policy E3 (Tourism), which allows smaller tourist facilities with a ‘specialist focus’ outside of the tourist centres.**”

The earlier paragraph in the Committee Report stated: “6.2.21 Policy E3 provides Local Plan support for the tourist economy. The policy expresses a hierarchy of preferred locations for tourism development and visitor accommodation: Central London, Town Centres, other locations. The site is outside Camden Town Centre and therefore the policy identifies (c) that the key concerns are “whether the tourism development would have a local or specialist focus and would attract limited numbers of visitors from outside the borough”.

I have highlighted in bold and underlined the very important part of the Policy which the pre-application addendum ignored.

In the case of this application, the provision of 5 small STL units would attract many less visitors from outside the borough than the approved 59-bedroom hotel. Therefore, the proposal would meet the Policy criteria of attracting limited numbers of visitors from outside the borough.

Whilst it is accepted the site is located on the edge of the Camden Town Centre, weight should be given to the fact the site is located as close to the edge of Camden Town Centre as a property can get. This is demonstrated by the image below. The application site is located by the red dot and the town centre boundary is the blue line. And the site is located within an area with the highest possible PTAL rating. It is a dense commercially active location and the terrace it forms part of has a varied mix of land uses with commercial uses at ground floor.



The site is in a designated Neighbourhood Centre, metres from the Town Centre and the boundary to the CAZ is 100m to the south at Lidlington Place.

Town Centre policy TC2 is aimed at promoting successful and vibrant centres that support the needs of residents, workers and visitors.

Due to the small scale of the development the proposal would not undermine the vibrancy of Camden Town Centre, and would instead support the centre's employment and nightlife uses in accordance with the aims of TC2a.

The proposed use would complement the existing uses in the Neighbourhood Centre, contributing to the centre's broad range of uses in accordance with TC2(b). The proposed STL use would be limited in scale with minimal/ nil amenity impacts. It would not hinder other town centre uses or create an amenity expectation that would hamper development at nearby sites. The proposal would contribute to the success and vibrancy of Eversholt St Neighbourhood Centre and Camden Town Centre and cause no harm to these centres.

Emerging policy IE5 recognises the importance of visitor accommodation in Camden's economy and IE5b expects all visitor accommodation to be easily accessible by public transport; not lead to loss of permanent residential accommodation or prejudice housing capacity; and not harm the mix of uses in the area, local character, services for the local community or transport systems. The proposal complies with all these requirements.

The pre-application addendum partly justified the planning permission at Regent's Park Road by stating it was located very close to the boundary, but the application site is as close to the town centre boundary as the approved hotel.

In any case, it is the applicant's case that the proposal does meet the exceptions part of the Policy E3 which allows tourism development (tourist development also includes tourist accommodation) outside town centres.

Part c. of Policy E3 states the Council will: "consider tourism development outside of the areas listed above (*town centres*) where it would have a local or specialist focus and would attract limited numbers of visitors from outside the borough."

The application site is located close to many places with a local and specialist focus, being close to the; Co Co building, Camden Market, the British Library, London Zoo, The Roundhouse, Sherlock Museum, Madame Tussauds, the Postal Museum, and the Queen Mary Rose Gardens.

The application site sits at a busy crossroads at the entrance to Camden Town Centre and has excellent access to public transport as indicated by the highest possible PTAL rating (6b).

It should be noted that the Regent's Park Road scheme is not the only application for visitor accommodation granted recently outside a town centre in LB Camden. In October 2020 the Council granted permission for a 46-room hotel at 55-57 Chalton Road (ref. 2016/5266/P), which was justified by its location in the Euston Plan Area and the need to build on opportunities and accommodate growth in the area. The Committee Report section 7.1-19

sets out the various locational, scale and other factors taken into consideration in the planning assessment against policy E3. The factors in favour included high PTAL level, the mixed-use character of the area, the location within the Euston Plan Area and the proximity to central London. The current proposal shares all of these characteristics and would support the aims of policy E3. Given its smaller scale it would give rise to less harm by disturbance and noise.

The pre-application addendum mentioned that the approved proposal at Regents Park Road had other benefits to justify the proposal, but the planning committee report made it clear the proposal for hotel accommodation was compliant with part c of Policy E3, and did not rely on other material considerations to justify approval.

In respect of the proposed application case, it is for a much smaller number of units (five) therefore, is more compliant with Policy E3 than the approved proposal, in respect of having limited number of visitors.

The pre-application response states; “the Council does not consider the location outside of the town centre to be appropriate for short term lets. It is acknowledged that a large portion of the borough of Camden is close to a range of tourist attractions, however that does not mean that all locations within the borough are appropriate for use as hotels or short term lets.”

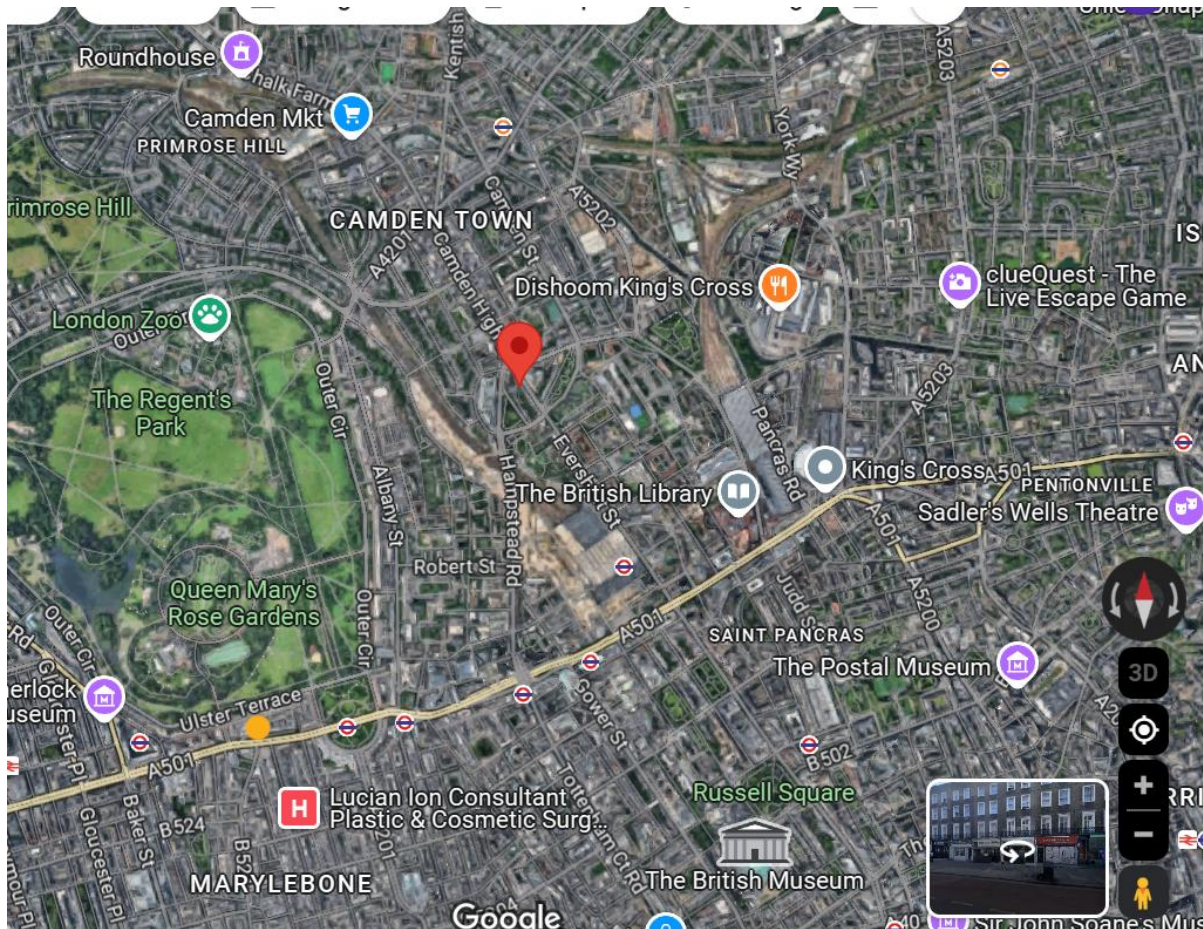
It is not reasonable to say the site is not appropriate for short term lets because; “a large portion of the borough of Camden is close to a range of tourist attractions.”

Every planning proposal is required to be considered on its own planning merits, and decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise. If too narrow an interpretation of Part c. of Policy E3 was applied, this part of the policy would rarely be applicable, which is not how the policy has been worded or applied in other cases.

The unique circumstances of this site to justify compliance with part c. of Policy E3 can be summarised as follows:

- The site has excellent access to public transport, as indicated by the highest possible PTAL rating (6b).
- The site sits at a busy crossroads at the entrance to Camden Town Centre.
- The site is located very close to many places with a local and specialist focus, being the; Co Co building, Camden Market, London Zoo and the British Library, all of which attract large numbers of tourists.
- The site is located close to many places with a local and specialist focus, being the; The Roundhouse, Sherlock Museum, Madame Tussauds, the Postal Museum and the Queen Mary Rose Gardens.

The image below shows the site with the red indicator and Madame Tussauds indicated by the yellow mark.



Another material consideration is what is said in the preamble to Policy E3 in paragraph 5.59, which states: “Other locations may also be appropriate where they are highly accessible by public transport and do not harm amenity, the environment or transport systems.” The application site complies with all these requirements which justifies recommending the grant of planning permission in this edge of town centre location.

6.0 Impact on the character and appearance of the property and the locality

The proposal does not seek any external alterations.

The site sits at a busy crossroads at the entrance to Camden Town Centre therefore the background noise levels are high.

The comings and goings of five SHT would not result in any measurable change in the character of the area.

7.0 Impact on neighbouring residential amenity

The proposal does not seek any external alterations.

The proposed STL will have their own communal entrance separate from the upper floor residential units.

The site sits at a busy crossroads at the entrance to Camden Town Centre therefore the background noise levels are high.

The comings and goings of five SHT would not result in additional noise and disturbance, over and above the high ambient noise levels of this busy commercial location.

It is important to note that the recent enforcement appeal decision confirmed the property was used as 15 short-term letting accommodation and no evidence was presented that any issues of noise and disturbance were attributable to the short-term letting use.

8.0 Standard of accommodation

Short-term letting accommodation are not required to meet the standards applicable to new residential dwellings.

The pre-application advice supported the standard of accommodation by stating as follows:

“STL units at basement and ground floor:

All units would only access natural light and outlook from small lightwells and the quality would be quite low. Therefore, given the access to natural light and outlook for the C1 short term let units proposed is quite poor, permanent residential accommodation (Class C3) would not be acceptable however in terms of amenity short-term visitor accommodation would be accepted. It would be advised that good sound proofing is installed to ensure that conflict is minimised between the STLs and the permanent residential units above.”

The application site is located in a highly accessible location (high PTAL rating) and very close to town centre amenities and shops.

9.0 Highway impacts

The site is located in a mixed used area with shops, workplaces, entertainment and leisure facilities and other local amenities nearby which will reduce the need for travel.

The site has a PTAL rating of 6b (highest possible rating), with excellent access to public transport.

The proposal is “car free”.

Servicing will be provided from the street, the same as the lawful use – it is not possible to provide on-site servicing, but the proposed use is very small scale.

Refuse generated by the proposed STL will be collected on the street in bags, as is the position with the existing lawful use.