

PLANNING & HERITAGE IMPACT STATEMENT

**16 Cleveland Street, Marylebone
London W1T 4HX**

Prepared For

LIPTON PLANT ARCHITECTS

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1 BACKGROUND INFORMATION

Introduction

- 1.1 This statement has been prepared in support of an application for full planning permission and Listed Building Consent for the change of use of a vacant 5-storey building at 16 Cleveland Street, Marylebone, from Class D1 [Non-Residential Institutions] to Class C3 [Residential], comprising the formation of 1 x 3-bedroom, 1 x 2-bedroom and 1 x 1-bedroom residential apartments, together with associated internal and external alterations.
- 1.2 This statement should be read in conjunction with the Heritage Statement prepared by the scheme's architects and other technical reports submitted in support of the application.
- 1.3 A pre-application meeting was held with planning and conservation officers at LB Camden on 7th October 2013. At that stage, the proposed development was for the conversion of the property into 1 x 3 bedroom residential unit on the ground and lower ground, with 3 x 1-bedroom units at first to third floors.
- 1.4 The advice provided by the Council officers, both at the meeting and subsequently in writing, has informed the content of the current application, particularly the internal layout and the mix of residential units. A copy of the pre-application advice letter, dated 19th November 2013, is attached hereto, as [Appendix BC.1](#).

The Application Site and its Surroundings

- 1.5 16 Cleveland Street is a mid-terraced property, arranged on five floors. It was most recently used by Camden & Islington NHS Foundation Trust as an alcohol services drop-in centre, and before that as Camden Drug Service criminal justice centre and other related NHS services. The NHS use ceased in October 2011 and the property has remained vacant since then. It was sold at auction in July 2013.
- 1.6 In summary, The Exchange (Cleveland Street Needle Exchange) began operating from the basement of 16a Cleveland Street in 1987 as one of the original pilot needle exchange schemes. At the time the building was also inhabited by a prosthetics clinic

and Occupational Therapy administration. By 1998, the other services had relocated and the building was solely occupied by The Exchange, although not actively using all the space. From 2000 - 2002 the building also hosted a Turning Point Mobile needle exchange staff team. The Exchange ceased on March 31st 2002.

- 1.7 The property lies on the western edge of Charlotte Street Conservation Area. It is a Grade II listed building, designated in May 1974. The listing description, which includes the attached frontage railings, notes that the shop front at ground floor level has been replaced and that the property was originally constructed as a dwelling in the late 18th century.
- 1.8 It is situated on the east side of Cleveland Street, north of its junction with Mortimer Street and south of Tottenham Street. Immediately to the north is a terrace of four similar four-storey buildings with basements [16-22, evens, Cleveland Street], while to the south is a large residential mansion block [2-14 Cleveland Street].
- 1.9 The site is well served by public transport, with both Goodge Street and Oxford Circus underground stations within easy walking distance. Several London Transport bus routes run on Tottenham Court Road/Gower Street, to the east and Oxford Street, to the south.
- 1.10 Photographs of the site and its immediate surroundings taken in October 2013 are reproduced as [Appendix BC.2](#).

Relevant Planning History

- 1.11 As indicated above, the property was last used as an alcohol services drop-in centre by the local NHS Trust. We have been unable to reveal planning permission for that use, but the records held by LB Camden confirm that in August 2004 enforcement action was commenced in connection with a number of unauthorised internal alterations to the Listed Building.
- 1.12 An application for retrospective Listed Building Consent for these internal alterations was submitted on behalf of St Pancras Hospital NHS Trust in December 2008 - *LB Camden ref: 2008/4616/L* - but was withdrawn before it could be determined. Supporting information submitted in connection with that application indicated that

the internal alterations were carried out in order to comply with infection control requirements and essential patient/staff security measures.

- 1.13 Notwithstanding the withdrawal of the retrospective LBC application, it appears that no further action was taken by LB Camden to secure the removal or regularisation of the unauthorised internal alterations to the Listed Building prior to its vacation by the NHS Trust in 2011.
- 1.14 On 17th July 2013, the current owners of the building were served with a Listed Building Enforcement Notice - *LB Camden ref EN04/0750*. This notice effectively revives the enforcement action that was commenced in 2004 against the NHS Trust but not followed through at that time. A copy of the enforcement notice is attached as [Appendix BC.3](#).
- 1.15 The enforcement notice came into effect on 28th August 2013, but in the pre-application discussions officers at LB Camden agreed that it is appropriate to address its requirements as part of the current planning application
- 1.16 The notice lists the unauthorised internal alterations and requires that the following works are carried out within a period of six months - i.e. by 28th February 2014 -
1. Reinstate the original plan form and repair any damage at first, second and third floor levels;
 2. Remove all data service runs, fixtures and fittings;
 3. Remove the suspended ceiling at ground floor level; and
 4. Paint the steel staircase supports white.
- 1.17 The enforcement notice specifically states that no action is to be taken regarding: the alterations at basement and ground floor levels, or the fire protective ceilings on the first to third floors.
- 1.18 The current planning and Listed Building Consent application seeks to satisfy actions 2, 3 & 4 of the enforcement notice, and to agree sympathetic restoration and alteration at first to third floor levels, in the context of the proposed residential use.

2 PLANNING POLICY CONTEXT

Preamble

- 2.1 The development plan for LB Camden comprises the London Plan [adopted July 2011] and the Camden Core Strategy and Development Policies DPD [both adopted in December 2010].
- 2.2 In accordance with the National Planning Policy Framework, the policies contained in these documents should only be given weight in the decision-making process to the extent that they are consistent with the principles set out in the NPPF.
- 2.3 Also of relevance are any Supplementary Planning Documents [SPDs] adopted by LB Camden.

National Planning Policy Framework

- 2.4 The National Planning Policy Framework (NPPF) was published on 27th March 2012. It carried forward the planning policies and protections contained within Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs) albeit in a more streamlined form with an emphasis on a '*presumption in favour of sustainable development*'.
- 2.5 This presumption in favour of sustainable development is seen by Ministers as "*a golden thread running through both plan making and decision taking*" but it is made clear that the starting point for decision taking is the adopted development plan for the area; therefore, applications for development that accord with an up-to-date Local Plan should be approved.

Local Planning Policies

- 2.6 The proposal has been assessed in relation to the policies contained within the London Plan and the adopted Camden Core Strategy and Development Policies DPD. The relevant development management policies are those contained in the Core Strategy and Development Policies DPD.

2.7 The **Core Strategy Proposals Map** identifies that the site lies within the Charlotte Street Conservation Area and is also in the Central London Area. It is not subject to any other specific policy designations.

2.8 The relevant **Core Strategy** policies are:

- CS1 - Distribution of Growth
- CS3 - Other Highly Accessible Areas
- CS6 - Providing Quality Homes
- CS9 - Achieving a Successful Central London
- CS10 - Supporting Community Facilities & Services
- CS11 - Promoting Sustainable & Efficient Travel
- CS13 - Tackling Climate Change
- CS14 - Conserving Heritage
- CS16 - Improving Camden's Health & Wellbeing

2.9 The relevant **Development Management** policies are:

- DP1 - Mixed Use Development
- DP2 - Making Full Use of Camden's Capacity for Housing
- DP5 - Homes of Different Sizes
- DP15 - Community & Leisure Uses
- DP17 - Walking Cycling & Public Transport
- DP18 - Parking Standards & the Availability of Car Parking
- DP25 - Conserving Camden's Heritage

Supplementary Planning Documents

2.10 The **Charlotte Street Conservation Area Appraisal and Management Plan**, adopted in July 2008, is a material consideration. It notes:

"Along Cleveland Street there are a variety of different building types, although the majority contribute to the character of the street. The listed Georgian townhouses at nos. 16-22, which once had shops and commercial uses at ground level appear to be suffering some vacancies, potentially as a result of the closure of the hospital. The condition of these buildings will need to be kept under review, however, the

redevelopment of the Middlesex Hospital site is likely to generate demand for ground floor commercial uses in this area." [para 6.24]

- 2.11 In practice, this optimism has not been justified. Cleveland Street is neither a primary nor secondary retail frontage, being located some distance from the commercial activities in Goadge Street and Tottenham Court Road. There is no empirical evidence of a demand for ground floor commercial uses in this area; indeed, what evidence there is suggests a decline in demand with several vacant ground floor units in the immediate vicinity.
- 2.12 The **Fitzrovia Area Action Plan [FAAP]** has reached its examination in public phase. It is presently subject to modification prior to its formal adoption in 2014 - always assuming that it is found 'sound' by the independent inspector who is conducting the examination. As such, its policies can be attributed only limited weight at this time.
- 2.13 FAAP Principle 1 seeks to maximise the delivery of housing from unallocated sites in Fitzrovia, including vacant properties. In line with Policy DP5 of the Camden Development Policies DPD, it expects all residential schemes to include large homes (3+ bedrooms), with a priority being given to them, rather than 1 and 2-bedroom units.
- 2.14 The proposed subdivision of 16 Cleveland Street acknowledges this priority for larger family units, but also takes into account the constraints imposed by a listed building which cannot provide any usable external amenity space. On that basis, we are satisfied that the proposed mix of 1, 2 & 3 bedroom units is entirely consistent with the emerging FAAP and Policy DP5.

3 PLANNING POLICY COMPLIANCE

National Planning Policy Framework

3.1 The Framework [para 14] states: "*at the heart of the NPPF is a presumption in favour of sustainable development.....*" In that context, it identifies three dimensions to 'sustainable development':

- An economic role;
- A social role; and
- An environmental role.

3.2 For decision-taking this means:

"Approving development proposals that accord with the development plan without delay."

3.3 In the light of the presumption in favour of sustainable development the Framework [para 17] identifies 12 'core planning principles', one of which is to:

"conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations"

3.4 Consequent guidance [para 131] advises local planning authorities that when determining applications affecting heritage assets they 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."*

3.5 It continues [para 134]:

"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." [our emphasis]

3.6 With regard to housing, the Framework [para 49] states:

"Housing applications should be considered in the context of the presumption in favour of sustainable development".

3.7 It continues in that vein [para 51] advising local planning authorities that:

"They should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate."

3.8 Turning to community facilities - including health services - local planning authorities are advised [para 70] to:

".guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs."

3.9 To summarise, the proposed development at 16 Cleveland Street will not result in substantial harm to the listed building or the character and appearance of the immediate surrounding conservation area. There is no substantive evidence of a need to retain a community facility in this location and the provision of three residential units will ensure the restoration and retention of the listed building whilst meeting an identified need for such accommodation.

3.10 Therefore, we conclude that it comprises 'sustainable development' consistent with NPPF guidance, with evident social, economic and environmental benefits.

LB Camden Core Strategy [CS] & Development Management [DM]

a) Loss of Community Use

- 3.11 **Policy CS9** is concerned with achieving a successful Central London. As such, the Council's principal objective is to: *"..support and promote the Central London area of Camden as a successful and vibrant part of the capital to live in, work in and visit."*
- 3.12 Part of that strategy is to seek an increase in the amount of residential accommodation in the central area [criterion b], which has to be balanced against a desire to ensure *"that development contributes to London's economic, social and cultural role while meeting the needs of local residents and respecting their quality of life"* [criterion c], and the aim to *"support residential communities within Central London by protecting amenity and supporting community facilities"* [criterion d].
- 3.13 **Policy CS10** expands on this theme. Whilst it supports the retention and enhancement of existing community, leisure and cultural facilities, at the same time it seeks to facilitate *"the efficient use of community facilities and the provision of multipurpose community facilities that can provide a range of services to the community at a single, accessible location."* [Criterion f]
- 3.14 **Policy CS16** has a similar double-edged approach to the provision of health facilities in the Borough. It seeks to protect existing health facilities in line with Policy CS10 [criterion b]; but also *"supports the provision of new or improved health facilities, in line with NHS London's plans to consolidate and modernise its facilities"* [criterion c].
- 3.15 **Policy DP15** provides additional flesh on the bones of the abovementioned CS policies. It states, in part:

"The Council will protect existing community facilities by resisting their loss unless:

(c) a replacement facility that meets the needs of the local population is provided;

or

(d) the specific community facility is no longer required in its current use. Where this is the case, evidence will be required to show that the loss would not create, or add to, a shortfall in provision for the specific community use and demonstrate that there is no demand for any other suitable community use on the site. Where this is successfully demonstrated, the Council's preferred new use will be affordable housing."

3.16 Camden & Islington Foundation NHS Trust took the decision to close the Alcohol Services drop-in centre at 16 Cleveland Street for economic and operational reasons. However, this facility has not been lost to the local community because the Camden Alcohol Service has relocated to new premises at 7-8 Early Mews, Arlington Road, Camden Town. [See e-mail from *The Estates Manager, Camden & Islington NHS Foundation Trust Camden & the Trust's information leaflet* - [Appendix BC.4](#)].

3.17 The Early Mews premises include a self-referral drop-in service, as well as dealing with referrals from local GPs. In addition, the NHS Trust leaflet lists other alcohol self-referral facilities in LB Camden at:

- Greenland Street NW1 [Thames Reach - Camden Spectrum];
- 8-9 Long Yard WC1N [Foundation 66]; and
- 33 Caversham Road NW5 [Forward Drug & Alcohol Service for Young People in Camden].

3.18 Therefore, returning to Policy DP15, criterion c, a replacement facility that meets the need of the local population has been provided by the local NHS Trust in a more convenient, efficient and sustainable location. There will be no shortfall in provision for the specific community use - an alcohol services drop-in centre. On that basis, criterion c is satisfied and there is no need to consider criterion (d)

3.19 In any event, as far as we are able to ascertain, there is no demand to occupy these freehold premises from any other suitable community use following the NHS Estates' decision to vacate. Indeed, we are advised by the auctioneer - Barnard Marcus - that no interest or bids were received from potential community users either prior to or at their auction in July this year. We attach a letter from Barnard Marcus confirming that information, together with a copy of the sales particulars - [Appendix BC.5](#).

3.20 Striking the appropriate balance between maintaining respect for the quality of life, protecting community facilities, and satisfying an identified need for additional residential accommodation in the central activities zone requires each planning application to be considered on its individual merits. In this particular case, the situation is further complicated by the Grade II listed status of the subject property and the requirements of the listed building enforcement notice.

3.21 In that context, we are entirely satisfied that the loss of the previous Class D1 use and the restoration of the property to its original Class C3 residential use is entirely appropriate and does not conflict with the principles and objectives set out in Policies CS9, CS10, CS16 and DP15.

b) Residential Use

3.22 **Policy CS1** seeks to distribute growth - including housing - to the most sustainable locations, including the Central London Area. **Policy CS9** includes a similar objective. Although 16 Cleveland Street does not lie within one of the Growth Areas designated under Policy CS2, it is subject to **Policy CS3** which promotes growth in the other highly accessible areas of the Borough.

3.23 We have established that residential use is appropriate in this particular case, following the vacation of the listed building by the local NHS Trust. **Policy CS6** states that the Council's objective is to: *"maximising the supply of additional housing to meet or exceed Camden's target of 5,950 homes from 2007-2017, including 4,370 additional self-contained homes."* Part of that strategy is to seek a range of self-contained homes of different sizes. [Criterion k]

3.24 **Policy DP1** takes these broad strategic policies forward. It requires a mix of uses in developments 'where appropriate', and in doing so acknowledges: *"In considering whether a mix of uses should be sought, whether it can practically be achieved on the site..."*

3.25 This site by site consideration should take the following criteria into account:

- *a) the character of the development, the site and the area;*

- *b) site size, the extent of the additional floorspace, and constraints on including a mix of uses;*
- *c) the need for an active street frontage and natural surveillance;*
- *d) the economics and financial viability of the development including any particular costs associated with it;*
- *e) whether the sole or primary use proposed is housing; and*
- *g) whether secondary uses would be incompatible with the character of the primary use;*

3.26 Looking at Criteria a & b, the supporting text to Policy DP1 notes:

"The retention and extension of an existing building on-site (especially a listed building or a building that makes a positive contribution to a conservation area) may prevent the creation of new features such as entrances, windows, staircases and lifts necessary to accommodate a mix of uses." [para 1.19]

3.27 In this particular case, the property is subject to a Listed Building Enforcement Notice which requires the removal of the unauthorised alterations carried out by the NHS Trust c10 years ago and the appropriate restoration of the building.

3.28 The inclusion of a non-residential use at ground floor level - particularly healthcare or community uses - would require the installation of internal walls, security features and other works in order to provide physical separation from the residential units. Such works would inevitably have a negative impact on the fabric of the Listed Building, in a similar manner to the unauthorised works carried out by the NHS that the Enforcement Notice seeks to remove.

3.29 Turning to criterion c, Cleveland Street is a busy traffic and pedestrian route running northwards from Oxford Street. The immediate surrounding area is mainly residential in character. This is not a primary or secondary commercial frontage and there is no demonstrable need for an active street frontage in this location.

3.30 Criterion d is concerned with viability. The Heritage Statement submitted in support of this application carefully describes the way in which the listed building is to be sensitively restored so as to create a financially viable development.

- 3.31 The Heritage Statement also explains why the 1 x 3-bed, 1 x 2-bed and 1 x 1-bed unit layout as currently proposed is the most appropriate option for this particular property, in both viability and conservation terms, as opposed to the pre-application layout [1 x 3-bed; 3 x 1-bed units] or the Council officers' suggested 2 x 3-bedroom format. *[See the Heritage Statement, Section 3]*
- 3.32 In the pre-application discussions, the Council officers accepted that residential use is the only alternative which will enable the terms of the enforcement notice to be met whilst at the same time putting the property to a viable use that is consistent with its long-term conservation. This approach is entirely consistent with the relevant NPPF guidance [para 131].
- 3.33 Under criteria e, the proposed primary use of the property is residential. The supporting text to Policy DP1 [para 1.23] notes:
- "where housing is the sole or primary use proposed, the Council may not seek secondary uses unless there is a shortfall of facilities in the area that will be needed for the development, (for example, open space or health facilities), or secondary uses are needed to provide an active street frontage."*
- 3.34 We have established that there is no need to provide an active street frontage here and there is no evidence of a shortfall in any facilities needed to support the proposed residential use as three flats.
- 3.35 The supporting text to criteria g confirms:
- "The Council recognises that where it seeks other planning benefits from a development or seeks to meet other planning objectives, this may limit the potential of a site to provide a mix of uses generally, or housing in particular."* [para 1.24]
- 3.36 In this case, the principal planning benefit to be delivered by the proposed development is the sympathetic restoration of the Grade II Listed Building as a result of the removal of the unauthorised works carried out by the previous owner, and the consequent return of the building to an appropriate and viable economic use, in accordance with NPPF guidance.

3.37 On the above basis, we are satisfied that the proposed conversion of this vacant property to wholly residential use, as 1, 2 & 3-bedroom apartments, does not conflict with the underlying aims and objectives of Policy DP1.

3.38 **Policy DP2** states that, in principle, the Council will seek to maximise the supply of additional homes in the Borough. It will achieve that objective by:

a) expecting the maximum appropriate contribution to supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site; and

- *b) resisting alternative development of sites considered particularly suitable for housing.*

3.39 In that context, **Policy DP5** looks to ensure that a range of house types and sizes are provided, whether new build or conversions. It notes: *"The Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes."*

3.40 The principal identified need in the market housing sector in Camden is for two and three bedroom units; however, Policy DP5 does acknowledge that there is a need to take account of:

- *the character of the development, the site and the area...;*
- *site size, and any constraints on including homes of different sizes; and*
- *the economics and financial viability of the site, including the demand for homes of different sizes.*

3.41 As we will show in sub-section (c) below, the size and layout of this Grade II listed building means that its restoration and conversion into residential accommodation will be most effectively and efficiently achieved by means of a self-contained 3-bedroom family unit at ground and lower ground level, with a self-contained 1-bedroom unit on the first floor and a 2-bedroom unit at second and third floors. In that way, there will be minimal impact on the remaining historic fabric of the building.

c) Heritage Impact

3.42 A detailed Heritage Statement has been provided by the scheme's architect and is submitted with the application. The following planning policy analysis should be read in conjunction with that statement.

3.43 The principles that apply to the protection of heritage assets are those set out in the NPPF, as identified in paragraphs 3.3 to 3.5, above.

3.44 **Policy CS14** follows those principles - although it is based on the Framework's predecessor, PPS5 - by *"preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings..."*

3.45 **Policy DP25** expands upon the principles set out in Policy CS14. In Conservation Areas it states:

"In order to maintain the character of Camden's conservation areas, the Council will:

- *a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;*
- *b) only permit development within conservation areas that preserves and enhances the character and appearance of the area"*

3.46 The Charlotte Street Conservation Area Appraisal & Management Statement [CAAMS] describes Cleveland Street as a quiet commercial street, with relatively few surviving buildings from the Georgian period [para 6.21] and confirms that four storey Georgian townhouses - such as No. 16 - are typical of the form of development found in that street [para 6.14].

3.47 Paragraph 6.24 of the CAAMS specifically notes:

"The listed Georgian townhouses at nos. 16-22, which once had shops and commercial uses at ground level appear to be suffering some vacancies, potentially as a result of the closure of the hospital. The condition of these buildings will need to be kept under review".

3.48 CAAMS Paragraph 13.7 states:

"Owners will be encouraged to keep listed buildings occupied and in appropriate use. The most appropriate use will be to retain a listed building in its original use."

3.49 In this particular case, it is proposed to follow the preferred approach identified in CAAMS by restoring a vacant building which has had suffered from inappropriate alterations in the recent past to its original residential use, consistent with the prevailing character of Cleveland Street and the surrounding area. Consequently, Policy DP25 criteria (a) and (b) are satisfied.

3.50 For Listed Buildings, the specified objective in Policy DP25 is:

"To preserve or enhance the borough's listed buildings, the Council will:

- *e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;*
- *f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and*
- *g) not permit development that it considers would cause harm to the setting of a listed building."*

3.51 Criterion (e) is not relevant here as it is not proposed to totally or substantially demolish the listed building. Similarly, Criterion (g) is not relevant as the setting of the listed building will be unaffected by the proposed restoration and conversion works.

3.52 With regard to criterion (f), the proposed change from community use to residential will return the property to its original use, as confirmed by the listing description, the shop front being a later addition. The proposed alterations will provide a sympathetic and sensitive restoration of the building to residential use, whilst at the same time removing the unauthorised alterations carried out by the previous owner and subject to a Listed Building Enforcement Notice. As such, the conversion works will not cause harm to the special interest of the building.

d) Climate Change

3.53 **Policy CS13** expects all development proposals to respond to climate change. Its principal requirement is:

"The Council will require all development to take measures to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation..."

3.54 The Heritage Statement submitted in support of the application explains how the proposed conversion of 16 Cleveland Street to residential use will incorporate energy saving features, such as 'slim-lite' double glazing. In addition, the restoration works will permit more natural light to penetrate the interior of the building, thereby reducing dependency on electric lighting.

3.55 Further information is provided in the Heritage Statement at Section 6.0.

e) Transport

3.56 **Policy CS11** is concerned with the promotion of sustainable and efficient travel in its widest sense. In that context, **Policy DP17** notes: *"The Council will promote walking, cycling and public transport use. Development should make suitable provision for pedestrians, cyclists and public transport..."*

3.57 **Policy DP18** develops that theme: *"The Council will seek to ensure that developments provide the minimum necessary car parking provision. The Council will expect development to be car free in the Central London Area....."*

3.58 The possibility of a car-free development was raised by the planning officers during the pre-application discussions. The applicants are prepared to accept a planning condition to that effect.

3.59 The proposed development at 16 Cleveland Street is entirely consistent with these principles. It lies in a highly accessible location - PTAL Rating 6b (excellent) - where car parking is not required. Indeed, the proposed residential use is likely to generate less traffic than a continuation of the previous Class D1 use.

3.60 The physical constraints of the site mean that cycle parking cannot realistically be provided within the building itself, or within its curtilage, without restricting access and egress from the property.

4 CONCLUDING REMARKS

- 4.1 We have demonstrated that the restoration of this vacant 5-storey listed building and the associated change of use from Class D1 [Non-Residential Institution] to Class C3 [Residential], comprising the formation of 1 x 3-bedroom, 1 x 2-bedroom and 1 x 1-bedroom residential apartments, is consistent with the relevant national and local planning policies.
- 4.2 The submitted application seeks to satisfy the actions specified in the Listed Building Enforcement Notice - which relate to the removal of unauthorised alterations carried out by the local NHS Trust around 10 years ago - and to carry out sympathetic restoration and alterations, in the context of the proposed residential use.
- 4.3 A pre-application meeting was held with planning and conservation officers at LB Camden and the helpful advice provided both at that meeting and subsequently in writing has informed the content of the application, particularly the internal layout and mix of residential units.
- 4.4 We have shown that there is no requirement to retain the property in community use because the alcohol drop-in facility that was located at 16 Cleveland Street prior to its vacation by Camden & Islington NHS Trust in 2011 has relocated to improved premises in Camden Town. In addition, other suitable drop-in facilities are provided elsewhere in the Borough.
- 4.5 Restoration of the vacant and dilapidated listed building to a viable residential use represents the most appropriate way to ensure that it is maintained as a valuable heritage asset. Residential use is in keeping with the character and appearance of the Charlotte Street Conservation Area and will not harm the fabric or setting of the Listed Building.
- 4.6 Consequently, we conclude that the proposed development is compliant with the relevant national planning policy guidance and local planning policies.

5 APPENDICES

BC.1 LB Camden Pre-Application Advice Letter, dated 19th November 2013

BC.2 Site Photographs

BC.3 Listed Building Enforcement Notice

BC.4 Camden & Islington Foundation NHS Trust e-mail dated 3rd December 2013 and NHS Trust Information Leaflet

BC.5 Barnard Marcus letter dated 29th November 2013 and sales particulars