

RECEIVED
03 JAN 2013

61-65 CHARLOTTE STREET

Planning Statement

CBRE

December 2012

CBRE

CONTENTS

1.0 Introduction	2
2.0 Site and Surroundings	4
3.0 Planning History for the Site	6
4.0 Pre-application Engagement.....	7
5.0 The Proposals	11
6.0 Planning Policy Overview.....	15
7.0 Planning Assessment	27
8.0 Conclusion.....	34

1.0 Introduction

- 1.0 This Planning Statement has been produced on behalf of Charlotte Street Investment Holdings, ("the applicant") by CBRE to accompany the application for planning permission for the redevelopment of 61-65 Charlotte Street comprising:

"Creation of a new retail unit for composite A1/A3 use at ground floor level of nos. 61 and 63 and basement level of nos. 61, 63 and 65 Charlotte Street and three new residential units (2x2 bed and 1x3 bed) on the upper floors of nos. 61 and 63 together with a new residential entrance at 61, external alterations to the properties including new shopfronts to nos. 61, 63 and 65 and new windows on the upper floors of nos. 61."
- 1.1 A full description of the existing site and the surroundings is set out in Section 2. The Statement also considers:
 - The context of the proposals;
 - Background to the proposals, including the planning history and consultation;
 - The planning policy framework including national and regional guidance as well as local policy within the London Borough of Camden; and
 - The proposed development's compliance with policy and other material considerations.
- 1.2 This document should be read in conjunction with the other documents forming part of the same submission, comprising:
 - Drawing Package by ARA Design;
 - Design and Access Statement by ARA Design;
 - Noise Assessment by Graham Powell Consultants (GPC);
 - Basement Impact Assessment by MBP;
 - Heritage Statement by Heritage Collective;
 - Energy Statement by GPC;
 - Retail Statement by CBRE;
 - Statement of Community Involvement by Lodestone; and
 - Letter from Robert Irving and Burns Commercial Agents.
- 1.3 The proposed development will create a mixed use development of the highest quality to provide highly desirable new residential apartments in a prime location, as well as a new unique composite A1/A3 'shop and dine' offer occupying the ground and basement floors, creating an attractive and active frontage to Charlotte Street which will enhance the retail offer and enliven the area. The proposals will bring back into use a vacant property along Charlotte Street (no. 61).
- 1.4 The proposals have been developed through a process of detailed pre-application discussions with LB Camden Planning and Conservation Officers which have informed the overall approach to the proposals and design evolution. This is explained in detail in Section 5 of this Statement in addition to the Design and Access Statement. Throughout these discussions, particular regard has been had to the sensitive context and heritage considerations associated with the

61-65 Charlotte Street – Planning Statement

property and the surroundings. The proposals will deliver a high quality scheme sympathetic and responsive to the Conservation Area context and the existing character of the Charlotte Street Area.

2.0 Site and Surroundings

The Site

- 2.0 The site is located on the western side of the Charlotte Street between Tottenham Street and Goodge Street. It is situated west of Tottenham Court Road, and is well served by public transport being 275 metres away from Goodge Street Underground Station. Warren Street and Tottenham Court Road stations are also in close proximity, together with regular bus services providing links to elsewhere in the West End and surrounding London.
- 2.1 The existing buildings are located in the Charlotte Street Conservation Area but are not listed buildings; however the buildings are identified making a positive contribution to the character and environment of the conservation area. The application site comprises a terrace of three buildings and sits within a run of Georgian terraces. On the opposite side of the road there is a large modern 7 storey office building which is currently occupied by Gaucho at ground floor.
- 2.2 A detailed assessment of the heritage and conservation issues associated with the property is set out in the Heritage Report submitted as part of this planning application. However, in summary, the properties have undergone considerable internal alteration and adaptation since the 19th century onwards. The elevations have also been subject to changes particularly at street level.
- 2.3 The subject properties are in use as follows:
 - 61: Currently Vacant but previously used for office space;
 - 63: Ground floor in use as GF hair salon with office uses above; and
 - 65: Ground floor in use as a sandwich shop with residential uses above.



61-65 Charlotte Street – Planning Statement

Surrounding Context

- 2.4 Charlotte Street area is characterised by a mix of residential, shopping and commercial uses. The northern end of Charlotte Street has a concentration of cafes, bars and restaurants, but is generally quieter than the main thoroughfares such as Tottenham Court Road. The southern end of Charlotte Street is more commercial in character, and a number of the buildings appear to be less well maintained than those north of Goodge Street, including some in a state of disrepair.
- 2.5 The wider Conservation Area is characterised by a mix of traditional Georgian and modern buildings. Shop fronts along Charlotte Street vary considerably in quality which is evident in the existing shop fronts of the subject buildings, with those of particularly high quality contributing to the evolution of the street. There are a greater number of alterations to shop fronts to the northern end of the street which have a subsequent impact on the Conservation Area, which is not necessarily positive depending on the approach they assume. Vacant lots (such as 61 Charlotte) also hinder the continued active street frontage and sense of vitality along Charlotte Street.
- 2.6 The southern end of Charlotte Street is predominantly older Georgian terraced houses, several of which are tired in appearance and in need of refurbishment. Progressing further north, the street is characterised by modern developments with a greater number of commercial uses as opposed to the concentration of retail uses to the southern end of the street near the application site.

3.0 Planning History for the Site

Planning History Overview

3.0 A review of Camden Council's planning register has been undertaken in order to establish the planning history for the site. There have been no planning applications relating to the properties since 1996. However, most relevant applications pre-1996 include:

1. Change of use to the ground floor of 63 Charlotte Street from retail (A1) to betting shop (A2) use was granted in 1994 (ref. 9401075);
2. Permission granted for a new shopfront at 61 Charlotte Street in 1995 (ref. 9500323); and
3. Erection of a glazed pitched roof on the single storey extension of no. 61 was approved in 1996 (ref. 9401972), following the withdrawal of the original scheme (ref: P9601127).

4.0 Pre-application Engagement

- 4.0 The proposed scheme has been developed in close consultation with Camden's Planning Officers and Conservation and Design Officers, following an extensive programme of pre-application engagement with a wider circle of key stakeholders at the early stages of the design process. The engagement and consultation comprised a series of meetings, correspondence and follow up discussions ensuring that all parties were kept up to date with the progress of the design. The key stakeholders, local residents and community groups include:
- London Borough of Camden;
 - Charlotte Street Association;
 - Fitzrovia Youth in Action;
 - Fitzrovia BID;
 - Fitzrovia Neighbourhood Group; and
 - Local Councillors.
- 4.1 The Design and Access Statement outlines in detail the design evolution process including that the scheme proposals have been developed through an iterative process in close consultation with Camden's officers. However, a summary of this is set out below.

Engagement with London Borough of Camden

- 4.2 A number of meetings took place with to discuss the proposals with LB Camden. These meetings were secured through a Planning Performance Agreement. The relevant meeting dates were as follows:
- 23rd August;
 - Site visit and follow up meeting 11th October;
 - 1st November;
 - 29th November.
- 4.3 A progressed scheme was presented to the Council on 1st November 2012, the principal elements of discussion were:
- Loss of employment floorspace at lower, ground floor and upper floors of no. 61 and upper floors of no. 63;
 - Amalgamation of the three ground floor units at no. 61-65 Charlotte Street with the redesign of all shop fronts;
 - Refurbishment of the lower level to incorporate basements of no. 61-65 to provide a dining area as well a wine and cheese tasting space with open kitchen; and
 - Change of use at upper floors of no. 61 and 63 to convert B1(a) office space to 3 residential flats (3x2 beds).
- 4.4 The primary concern raised in pre-application discussions was the loss of employment floor space including that policy focuses on protecting existing employment areas (i.e. industrial floorspace and not B1(a) offices). Alongside this Officers requested that the applicants assess the suitability of the premises for use by Small and Medium Enterprises (SMEs). The office accommodation in no.

61-65 Charlotte Street – Planning Statement

61-63 has been vacant for over 1 year and input from local commercial agents Robert Irving and Burns who have over 50 years experience in the area was sought on the suitability of the premises by SMEs. This is discussed later on in this statement.

- 4.5 Officers offered support for the principle of the inclusion of an apprenticeship for a local person and a potential contribution towards the improvement of public realm in the local area.
- 4.6 The original retail offer sought to amalgamate all three units on the ground floor providing a composite A1/A3 retail unit, the elements of A3 would be located to the rear of ground floor level and further dining provision at lower level. Concern was raised by officers around the size of the retail offer, the level of A3 floorspace proposed and the policy preference for the provision of small retail units as part of new development. Through the pre-application process, the size of the retail unit has been reduced including a reduction in the level of A3 dining space proposed together with the retention of a small retail unit at the ground floor of no. 65.
- 4.7 The original proposals included an additional fourth floor involving a roof extension, however, following the appointment of a heritage advisor, the Heritage Collective, this was not pursued since it was identified that the property forms part of a terrace with traditional butterfly roofs which contribute to the character of the Conservation Area.
- 4.8 Consideration was also given to the character of the Conservation Area through the sensitive design approach in respect to the shop front of no. 61-65. The proposed improvements to the shopfronts so that they are more sympathetic to the Conservation Area was also welcomed by Officers.
- 4.9 Camden's Conservation and Urban Design Officer suggested that retention of the internal party walls between the properties could go some way towards maintaining the perception of three separate retail units at ground floor level and also retain the traditional internal layout of the properties. This has been addressed within the planning application proposals.
- 4.10 It was proposed that the scheme would achieve a BREEAM Very Good rating for both the retail and residential accommodation, this was welcomed by Camden's Officers. The main issue in respect of the sustainability strategy is to ensure that adequate ventilation is provided to the lower floor for the operation of the kitchen.

Public Exhibition

- 4.11 A public exhibition regarding the proposed development was held at no. 61 Charlotte Street on 8th November 2012 from 1 to 8pm.
- 4.12 The proposals displayed at the exhibition included a number of changes to the scheme with the extension of the partition walls between the ground floor properties of nos. 61, 63 and 65 so that they appear as individual units from the streetscape.

Feedback

- 4.13 Approximately 50 people attended the public exhibition including a range of local residents, workers and business owners. 25 comments were submitted of

61-65 Charlotte Street – Planning Statement

accommodation at upper floors completes the framing of the three shop fronts in line with the existing entrance to the right of no. 65.

- 5.18 The initial design for the redevelopment of the proposed site included a roof extension to incorporate a fourth floor. However, following a heritage report carried out by Heritage Collective it revealed the architectural merit of the butterfly feature of the roofscape. Subsequently proposals for increasing the massing of the existing building were dismissed and proposals focused on provide high quality residential accommodation within the current form.
- 5.19 The scope of works to the rear elevation will be minimal with the upgrading of the existing double height glazed roof over the basement of no. 61, rationalisation of the plant on the other perimeter of this roof and the installation of an extract fan. The introduction of the extract fan is a requirement for the operation of the kitchen areas at basement level. The external flue will be painted black similar to some of the existing piping along neighbouring properties following advice from Camden's Conservation Officer.
- 5.20 Internal alterations to the upper floors will be minimal accounting for structural properties of partition walls where adjoining properties are amalgamated. Lower level refurbishments will also take place including interior refurbishment and the creation of new openings to create a larger basement area. No basement level excavations are proposed.
- 5.21 The quality of the space at lower level will enjoy high levels of natural light through the roof lights over the rear of basement at no.61. The double height roof space also creates a warm and pleasant ambience suitable for the informal dining area. This attention to the creation of unique spaces follows through on the ground floor level to present a rustic and natural finish emulating the quality of produce that will be provided.
- 5.22 In response to the character of the Conservation Area where small shops are a common feature the proposal will retain the majority of the partition walls so that the shops at no. 61 and 63 appear as individual units from the street. No. 65 will remain as a separate retail unit at ground floor level but will be occupied by a butcher shop which will add to the retail offer at nos. 61 and 63.

Access and Accessibility

- 5.23 The building has been designed to be fully accessible in accordance with Equality Act 2010 requirements. A lift and stairs will provide access to the lower ground (basement) floor level. The non-residential element will be fully compliant with Part M of the building regulations.
- 5.24 Access into the residential part of the building, from Charlotte Street, is via the new entrance to the right of no. 61 leading to an adequately sized stair and core system.

Transport and Parking

- 5.25 Being located in central London, the proposed development is 'car free'. In line with Camden's guidance 4 secure cycle parking bays for use by the residential units in the lobby area of the entrance by no. 61. Within the constrained site footprint it is not possible to provide cycle parking for the restaurant element within the building.

61-65 Charlotte Street – Planning Statement

- 5.26 Furthermore, given that only three residential units in total are proposed, the proposals are not considered to necessitate a full transport statement or travel plan as the proposals will not have a material impact on transport conditions locally.
- 5.27 A Delivery and Servicing Report submitted in support of the application identifies that the proposals will not result in any unacceptable impacts on the surrounding area. Planning conditions can be used to carefully control the hours of delivery.

Sustainability and Energy

- 5.28 Action has been taken to reduce and minimise the carbon emissions and energy demand for the development in line with the recommendations in section 4 of the Camden Planning Guidance 3 (CPG 3, 2011) document. The thermal performance of the existing building will be significantly improved with new U-values (for walls, glazing and roofs) exceeding the building regulations requirements for new buildings. Efficient low energy building services will replace the existing services (including boilers, ventilation plant and heat pumps). SAP and SBEM calculation have demonstrated that by improving the thermal performance of the building envelope and installation of efficient building services a 46% saving in carbon emissions and energy demand will be made across the site. The proportion of the project cost spent on improving the thermal performance of the building and energy efficient services will be in excess of 10% of the total. The BREEAM pre-assessments for the retail unit and residential areas indicate that a rating of "Very Good" will be achieved for both.
- 5.29 The scheme currently achieves "Very Good" rating. The pre-assessment report includes a column of potential targeted credits which could take the scheme to an "Excellent" rating however these are not considered viable or in some cases practically achievable. Achieving an "Excellent" rating for the BREEAM Domestic Refurbishment assessment will be extremely difficult without making significant changes to the layouts (i.e. introducing drying space, home offices etc) or the introduction of on-site power generation from renewable sources. The energy statement includes reviews of the renewable energy technologies that have been considered for use on this development. The reviews indicate that due to a combination of site constraints and restrictions there are no viable renewable solutions for the development. It is intended that the design team will endeavour to achieve the BREEAM "Very Good" rating identified in the pre-assessment report and where feasible and viable improve.
- 5.30 CPG 3 Section 4 states that developments involving change of use or conversion are expected to achieve 60% of the un-weighted credits in the energy category. The proposed scheme currently achieves this. Furthermore it is worth stressing that BREEAM for Domestic Refurbishments scheme has since replaced EcoHomes. EcoHomes and BREEAM Domestic Refurbishment have different criteria that cannot be compared across the whole assessment and the BRE has not yet published any documents demonstrating the correlation between the two assessments or a methodology of how to compare the assessments' ratings.

6.0 Planning Policy Overview

- 6.0 The Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004 establish the legislative basis for town planning in England and Wales. Together these acts establish a 'plan led' system which requires local planning authorities to determine planning applications in accordance with the statutory development plan, unless material considerations indicate otherwise (section 38 (6) of the 2004 Act).
- 6.1 This section identifies the principal policies applicable to the determination of these proposals and the principal material considerations.

NATIONAL POLICY

- 6.2 The National Planning Policy Framework (NPPF) was published on the 27th March 2012. It consolidates national planning guidance into a single document (and technical appendices) and replaces all Planning Policy Guidance Notes and Planning Policy Statements with the exception of PPS10.

Sustainable Development

- 6.3 The NPPF identifies that the purpose of the planning system is to achieve sustainable development which comprises three strands - economic, social and environmental:
- an economic role - contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
 - an environmental role - contributing to protecting and enhancing our natural, built and historic environment; including improving biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
- 6.4 At paragraph 9 it identifies that pursuing sustainable development involves "seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):
- making it easier for jobs to be created in cities, towns and villages;
 - moving from a net loss of bio-diversity to achieving net gains for nature;
 - replacing poor design with better design;
 - improving the conditions in which people live, work, travel and take leisure;
 - and,
 - widening the choice of high quality homes."
- 6.5 Paragraph 14 identifies that at the heart of the NPPF is a presumption in favour of sustainable development. For plan-making, this means local planning

61-65 Charlotte Street – Planning Statement

authorities should positively seek opportunities to meet the development needs of their area, for decision-taking this means approving development proposals that accord with the development plan without delay.

Core Planning Principles

- 6.6 The NPPF sets out 12 land-use principles that should underpin both plan-making and decision-taking, including, inter alia, that planning should:
- be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
 - proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. This includes that “every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth”.
 - always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
 - take account of the different roles and character of different areas, promoting the vitality of our main urban areas;
 - support the transition to a low carbon future in a changing climate;
 - encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
 - promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas;
 - conserve heritage assets in a manner appropriate to their significance;
 - actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

Economy

- 6.7 The NPPF reinforces the Government’s commitment to securing economic growth in order to create jobs and prosperity (paragraph 18) and specifies “significant weight should be placed on the need to support economic growth through the planning system”.
- 6.8 Paragraph 21 states that planning policies should recognise and seek to address potential barriers to investment, including a poor environment or lack of infrastructure, services or housing including identifying “priority areas for economic regeneration, infrastructure provision and environmental enhancement”. In drawing up Local Plans, local planning authorities should also ensure policies are flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.
- 6.9 Paragraph 22 states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be

61-65 Charlotte Street – Planning Statement

treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

Town Centres

- 6.10 Paragraph 23 identifies town centres as the heart of communities and therefore policies must support their viability and vitality. A network and hierarchy of centres that are resilient to anticipated future economic changes is necessary.
- 6.11 The sequential test should be applied for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan.

Sustainable Transport

- 6.12 Paragraph 30 supports development that facilitates the use of sustainable modes of transport.

Housing

- 6.13 At Paragraph 50 the NPPF identifies the objective for LPAs to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities including, inter alia;
 - plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
 - identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

Design

- 6.14 The NPPF identifies that the Government attaches “great importance to the design of the built environment” and that good design is a key aspect of sustainable development and should contribute positively to making places better for people (paragraph 56).
- 6.15 Paragraph 58 establishes that developments, inter alia:
 - Function well and add to the overall quality of the area over the lifetime of the development;
 - Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
 - Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
 - Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
 - Create safe and accessible environments where crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion; and

61-65 Charlotte Street – Planning Statement

- Are visually attractive as a result of good architecture and appropriate landscaping.
- 6.16 Paragraph 66 states that applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably.

Climate Change

- 6.17 Paragraph 96 establishes that local planning authorities should expect new development to comply with Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicants that this is not feasible or viable, and to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

Environment

- 6.18 Paragraph 111 identifies that planning decisions should encourage the effective use of land by re-using previously developed (brownfield) land, provided it is not of high environmental value.
- 6.19 At paragraph 123 the NPPF identifies that planning policies and decisions should, inter alia:
- Avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; and
 - Mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions.

Heritage

- 6.20 Paragraph 128 requires the applicants describe the significance of any heritage assets affected, including any contribution made by their setting.
- 6.21 Paragraph 131 requires local planning authorities to take into account the following when determining planning applications:
- 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.

STATUTORY DEVELOPMENT PLAN

- 6.22 The statutory development plan for the site comprises:
- The London Plan (Adopted 2011)
 - Camden Core Strategy (Adopted 2010)
 - Camden Development Policies (Adopted 2011)

61-65 Charlotte Street – Planning Statement

The London Plan

- 6.23 The London Plan was adopted in July 2011 and formally replaces The London Plan (Consolidated with Alterations since 2004) 2010.
- 6.24 The London Plan retains the fundamental objective of accommodating London's population and economic growth through sustainable development. The Mayor's vision for London to "excel among global cities, expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change".
- 6.25 The objectives are to ensure London is a city that: meets the challenges of economic and population growth; is internationally competitive and successful; is diverse, strong, secure and has accessible neighbourhoods; delights the senses; is a world leader in improving the environment; and where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.
- 6.26 The policies of significance to this application are summarised below.

Housing

- 6.27 **Policy 3.1: Ensuring life chances for all** - expects all development proposals to protect and enhance facilities and services that meet the needs of particular groups and communities. Proposals involving loss of these facilities without adequate justification or provision for replacement should be resisted.
- 6.28 **Policy 3.3: Increasing housing supply** - sets the Borough of Camden a target to deliver a minimum of 665 net additional dwellings per annum between 2011 and 2012 (with a ten year target of 6,650 new additional dwellings).
- 6.29 **Policy 3.4: Optimising Housing Potential** - expects development to optimise housing output for different types of location within the relevant density range, although the range is not to be applied mechanistically.
- 6.30 **Policy 3.5: Quality of Design of Housing Developments** - expects housing developments to be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in the Plan to protect and enhance London's residential environment and attractiveness as a place to live.

Retail

- 6.31 **Policy 4.7: Retail and Town Centre Development** - states that the Mayor supports a strong partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centres. Retail, commercial, culture and leisure developments should be focussed on sites within town centres in line with sequential approach in PPS4. Proposals for new or extensions to existing, edge or out of centre development will be subject to an assessment of impact.
- 6.32 **Policy 4.8: Supporting a Successful and Diverse Retail Sector** - seeks to ensure the Mayor and boroughs and other stakeholders support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need and the broader objectives of the spatial structure of the London Plan, especially town centres.

61-65 Charlotte Street – Planning Statement

Sustainable Development

- 6.33 **Policy 5.3: Sustainable Design and Construction** - requires new development to achieve the highest standards of sustainable design and construction. Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement.
- 6.34 **Policy 5.4: Retrofitting** - requires existing buildings to reduce their environmental impact so that they are brought up to the Mayor's standards on sustainable design and construction. In particular, programmes should reduce carbon dioxide emissions, improve the efficiency of resource use (such as water) and minimise the generation of pollution and waste from existing building stock.

Transport

- 6.35 **Policy 6.3: Assessing Effects of Development on Transport Capacity** - requires development proposals to ensure that impacts on transport capacity and the transport network are fully assessed.
- 6.36 **Policy 6.13: Parking** - seeks and appropriate balance between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.

Design

- 6.37 **Policy 7.6: Architecture** - expects architecture to make a positive contribution to a coherent public realm, streetscape and wider cityscape by incorporating the highest quality materials and design appropriate to its context. As such, buildings and structures should, inter alia, be of the highest architectural quality, be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm, comprise details and materials that complement, not necessarily replicate, the local architectural character, and optimise the potential of sites.

Heritage

- 6.38 **Policy 7.8: Heritage Assets and Archaeology** - states that development should identify, value, conserve, restore, re-use and incorporate heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 6.39 Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Camden Core Strategy

- 6.40 The London Borough (LB) of Camden Local Development Framework comprises the Core Strategy and Development Policies DPD documents adopted 8 November 2010.

Housing

- 6.41 **Policy CS6: Providing Quality Homes** - stipulates that housing is a priority land-use of the Camden LDF.
- 6.42 Camden Council seeks to:

61-65 Charlotte Street – Planning Statement

- Maximise 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;
- Minimise the net loss of existing homes and affordable housing;
- Support the supply of additional student housing providing this does not prejudice the Council's ability to meet self contained housing targets, a balance of uses within the area, and a high quality of residential amenity in the area;
- Strong requirement for a variety of unit size in new developments (as set out in dwelling size priority table); and
- Affordable housing target of 50% of total addition to housing floorspace, with guidelines of 60% social rented and 40% intermediate housing.

Economy

- 6.43 **Policy CS8: Promoting a Successful and Inclusive Camden Economy** - identifies that Camden will seek to secure a strong economy in the Camden through supporting Camden's industries by; inter alia:
- Safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers;
 - Support local enterprise development, employment and training schemes for Camden residents;
 - Recognise and encourage the concentrations of creative and cultural businesses in the borough as well as supporting the development of Camden's tourism sector whilst ensuring that any new facilities meet the other strategic objectives of the Core Strategy;
 - Expect a mix of employment facilities and types including the provision of facilities suitable for small and medium sized enterprises, such as managed affordable workspace; and
 - Recognize the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.
- 6.44 The supporting text of the policy notes that the majority of office stock in Camden is in Central London, particularly in the area between the City and the West End, which has a high number of small to medium sized single occupier buildings.
- 6.45 In order to meet the forecast demand according to the Camden Employment Land Review 2008 the Council will direct new business development to the primary growth areas such as Euston and King's Cross where 80% of demand in office floorspace will be met. Smaller scale office development will also occur at other sites across Central London ensuring that the future supply of offices in the borough can meet projected demand.
- 6.46 Paragraph 8.8 of the Core Strategy stipulates that the Council will consider proposals for other uses of older office premises if they involve the provision of permanent housing and community uses.
- 6.47 It also identifies that, Camden has a large proportion of small businesses, however there is a lack of high quality premises suitable for small businesses

61-65 Charlotte Street – Planning Statement

particularly less than 100 sq.m and therefore the Council will continue to protect premises that are suitable for such uses. SMEs will seek premises that have flexible terms like shorter leases, layouts that can adapt as the business grows or changes and the potential ability to network spaces to interact with other small business uses.

Heritage

6.48 **Policy CS14: Promoting high quality places and conserving our heritage** - requires development to:

- Be of the highest design standards that respects local context and character;
- Preserve and enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
- Promote high quality landscaping and works to streets and public spaces; and
- Seek the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible.

Development Policies

Housing

- 6.49 **DP1: Mixed use development** - stipulates that the Council will require a mix of uses in development where appropriate, including a contribution to the supply of housing.
- 6.50 **DP2: Making full use of Camden's capacity for housing** - seeks to maximise the supply of additional homes in the Borough by expecting the maximum appropriate contribution to supply of housing on sites that underused or vacant, taking into account any other uses that are needed at the site.
- 6.51 **DP3: Contributions to the supply of affordable housing** - expects all residential developments with a capacity for 10 or more additional dwellings to make a contribution to the supply of affordable housing.
- 6.52 **DP6: Lifetime homes and wheelchair housing** - requires all housing development to meet lifetime homes standards. 10% of homes developed should either meet wheelchair housing standards, or be easily adapted to meet them.

Town Centre Uses

- 6.53 **DP12: Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses** - states that the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours.
- 6.54 **DP13: Employment premises and sites** - This policy identifies that the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless it can be demonstrated:
- To the Council's satisfaction that a site or building is no longer suitable for its existing business use; or

61-65 Charlotte Street – Planning Statement

- If there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.
- 6.55 Where it can be demonstrated that a site is not suitable for any business use other than B1 (a) offices, the Council may allow a change to permanent residential uses.
- 6.56 When assessing proposals that involve the loss of a business use the Council will take into consideration whether the site is in a primary industrial area, or is in a location suitable for a mix of uses, has on-site vehicle space for servicing or is in a reasonable condition to allow the use to continue.
- 6.57 Premises with proposals for a change of use to a non-business use must demonstrate that there is no realistic prospect of demand to use the site for an employment use through the submission of a marketing exercise, sustained over at least two years. This should include marketing at realistic prices, including a consideration of alternative business uses and payouts and marketing strategies., inter alia:
- The cumulative impact of food, drink and entertainment uses taking into account the number and distribution of existing uses and non-implemented planning permissions, and any record of harm caused by such uses;
 - The impact of the development on nearby residential uses and amenity, and any prejudice to future residential development;
 - Parking, stopping and servicing and the effect of the development on ease of movement on the footpath;
 - Noise and vibration generated either inside or outside of the site;
 - Fumes likely to be generated and the potential for effective and unobtrusive ventilation; and
 - The potential for crime and anti-social behaviour, including littering.
- 6.58 The Council will consider redevelopment proposals for mixed use schemes where they include other priority uses such as housing and community uses.

Transport

- 6.59 **DP16: The transport implications of development** - seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links.
- 6.60 **DP18: Parking standards and limiting the availability of car parking** - seeks 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.

Sustainable Development

- 6.61 **DP22: Promoting sustainable design and construction** - requires development to incorporate sustainable design and construction measures, such as green or brown roofs and green walls, and including demonstrating how sustainable development principles have been incorporated.

61-65 Charlotte Street – Planning Statement

Design

- 6.62 **DP24: Securing high quality design** - requires all developments to be of the highest standard of design and will expect developments to consider, inter alia, character, setting, context, form and scale of neighbouring buildings, the character and proportions of the existing building and the provision of visually interesting frontages at street level.

Heritage

- 6.63 **DP25: Conserving Camden's Heritage** - states that the Council will:
- Take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
 - Only permit development within conservation areas that preserves and enhances the character and appearance of the area; and
 - Prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention.
- 6.64 **DP26: Managing the impact of development on occupiers and neighbours** - seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity.
- 6.65 **DP28: Noise and Vibration** - seeks to ensure that noise and vibration is controlled and managed.
- 6.66 **DP30: Shopfronts** - expects a high standard of design in new and altered shopfronts, canopies, blinds, security measures and other features. The Council will resist the removal of shop windows without a suitable replacement and will ensure that in appropriate cases where shop, service, food, drink and entertainment uses are lost, a shop window and visual display is maintained.
- 6.67 When considering proposals for shopfront development, the Council will consider:
- The design of the shopfront or feature;
 - The existing character, architectural and historic merit and design of the building and its shopfront;
 - The relationship between the shopfront and the upper floors of the building and surrounding properties, including the relationship between the shopfront and any forecourt or lightwell;
 - The general characteristics of shopfronts in the area; and
 - Community safety and the contribution made by shopfronts to natural surveillance.

SUPPLEMENTARY PLANNING GUIDANCE

Camden Planning Guidance (2011) CPG5 - Town Centres, Retail & Employment

61-65 Charlotte Street – Planning Statement

- 6.68 CPG5 is not a development plan document but is a supplementary planning guidance document and it forms a material consideration in the determination of planning applications. It identifies that the main criteria which will be used when assessing applications for a change of use from office to non-business use are:
- Age of the premises, some older premises will be more suitable to conversion;
 - Whether the premises include features required by tenants seeking modern office accommodation;
 - The quality of the premises and whether it is purpose built accommodation. Poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion;
 - Whether there are existing tenants in the building, and whether these tenants intend to relocate;
 - Location and if there is evidence of demand for office space in this location;
 - Whether the premises currently provide accommodation for small and medium businesses; and
 - Where it is difficult to make an assessment using the above, the Council may seek additional evidence in the form of a marketing assessment.

EMERGING POLICY

Fitzrovia Area Action Plan

- 6.69 The Fitzrovia Area Action Plan (FAAP) is at an early stage of preparation, and is due to be adopted in 2013. The Council have set up a steering group to help shape the plan by setting objectives and commenting on the content as it develops. As such, it is unlikely to hold a significant amount of weight with regard to this application, however, a summary of the steering group meetings is provided below.

Housing

- 6.70 Objective 1 is to achieve more well designed affordable housing that supports a stable mixed local population, in line with the Development Plan.
- 6.71 Particular emphasis will be placed on ensuring the full integration of all affordable homes within the context of any housing development/any commercial development, ensuring the appropriate mix of unit sizes to accommodate a range of households sizes, ensuring the long term sustainability of all housing, in particular new housing, ensuring the creating of residential mixed communities and ensuring high quality design.

Open Space

- 6.72 Objective 2 is to provide more and better quality open space.
- 6.73 Open space provision should be explored through ensuring public access to existing green space and progressing creation of new green spaces and greening of thoroughfares through identifying opportunities for new green spaces linked to existing vacant sites.

61-65 Charlotte Street – Planning Statement

Community Facilities

- 6.74 Objective 3 is to provide more and appropriate and better community facilities through protecting and improving existing community facilities in the borough.

Character of the Area

- 6.75 Objective 4 is to sustain and promote the valued character of the area.

- 6.76 The priorities will be to:

- Protect and enhance the mix;
- Protect and enhance the quality of existing residential streets;
- Protect and enhance the primacy of key commercial areas/thoroughfares;
- Protect and enhance beautiful 'interesting' streetscapes; and
- Protect and enhance 'pockets of calm'.

Traffic

- 6.77 Objective 5 is to reduce the impact of traffic; this should be through protecting and enhancing quieter areas, prioritising radical solutions to address the impact of traffic in the "major canyons" and thoroughfares such as Tottenham Court Road, and removing traffic and cars in specific locations.

Small and Medium businesses

- 6.78 Objective 7 is to promote small and medium business interests as well as independent and specialist shops.

- 6.79 The priorities are to:

- Promote and preserve the overall mix of residential and commercial uses in Fitzrovia, ensuring Fitzrovia retains not just the mix of residential and commercial premises but also the link between space and the local population;
- Promote a full range of size and types of commercial unit; and
- Identify and promote active frontages which are mindful of residents' needs.

Sustainability

- 6.80 Objective 8 is to ensure a long term sustainable future by reducing the impact of air conditioning and lighting

7.0 Planning Assessment

- 7.0 This section of the Planning Statement provides an assessment of proposed development in relation to planning policy and material considerations relevant to the determination of the application.
- 7.1 The proposals have been developed in consultation with LB Camden through a process of pre-application engagement. Consultation with local amenity and interest groups was also undertaken, as set out in the Statement of Community Involvement.

Principle of Use

- 7.2 The application proposes the creation of a composite A1/A3 retail unit at ground floor of nos. 61 and 63 and at basement level of nos. 61, 63 and 65 and residential uses on the upper floors. The key planning issues relating to the proposals include:
- The principle of the creation of a new retail unit;
 - The introduction of additional food and drink uses;
 - The loss of office floorspace; and
 - The creation of residential uses on the upper floors.
- 7.3 These issues are discussed in turn below.

Retail and Food and Drink Uses

- 7.4 The introduction of new retail and food and drink issues are discussed in detail in the Retail Statement submitted as part of this application. It has been demonstrated that the introduction of new retail and food and drink uses will not result in any negative impact on the surrounding area and furthermore that they are acceptable in terms of Camden, London Plan and NPPF retail policies including impact and sequential considerations.
- 7.5 The proposals will enhance the character and vitality of the Charlotte Street area through the introduction of a unique and independent retail offer providing fresh produce and casual dining experience. As set out in the description of the proposals, no basement excavation is proposed, therefore the basement will remain on different floor levels which provides an unusual, characterful space which is not suitable for national multiple retailers, this reinforces the independent nature of the proposals.
- 7.6 In addition, the careful use planning conditions and a legal agreement will secure the independent nature of the proposals and the specifics of operation and management including hours of operation and identification of maximum permissible A1 retail and A3 restaurant space.
- 7.7 In terms of the introduction of additional dining uses within Charlotte Street, whilst the proposals provide 186sq.m of restaurant space, it should be noted that the proposed dining facilities will not form a separate A3 offer but will function as part of the overall 'shop and dine' experience. This is further reinforced that the A3 areas are located at basement level and must be accessed directly through the retail element.
- 7.8 Furthermore, the proposed amount of A3 and seating areas have been significantly reduced compared to the original proposals presented to Officers

61-65 Charlotte Street – Planning Statement

through pre-application discussions (which showed a significantly greater area of seating at ground floor level with the total dining area at circa 400 sq.m).

- 7.9 No. 65 at ground floor will remain as a separate retail unit, whilst the internal areas do not form part of this application it is proposed that no. 65 will form part of the overall retail offer and will be occupied by a butcher shop. The retention of a small retail unit is in line with LB Camden's LDF policy DP10.
- 7.10 The opening hours of the retail and dining offer will be managed through the use of planning conditions with a closing time of 10pm from Mondays to Saturdays and 6pm on Sundays and Bank Holidays.
- 7.11 Whilst the proposals exceed the policy recommendation of 100sq.m for additional food and drink uses, considered in light of the above, the proposals are therefore acceptable in terms of Camden's policy DP12 and Central London Planning Guidance.
- 7.12 Overall, the development of a proposed new retail and dining offer at ground floor and basement levels is therefore considered acceptable in terms of the NPPF, London Plan policies 4.7 and 4.8 Camden's adopted policies CS8, DP10 and DP12.

Loss of Office Floorspace

- 7.0 The proposals involve the change of use of office floorspace at ground floor and basement of no. 61, and the upper floors of no. 61 and no. 63. The existing buildings include a total of 892sq.m (GEA) of office floorspace which comprises:
 - 485sq.m at ground floor and basement level of no. 61
 - 219sq.m on floors 1-3 of no. 61; and
 - 188sq.m at floors 1-3 of no. 63.
- 7.1 It should be noted that, at present, no. 61 in its entirety is vacant equating to a total of 704 sq.m.
- 7.2 The National Planning Policy Framework (March 2012) includes A class retail uses as well as traditional B class employment uses within the definition of economic development. The NPPF at paragraph 17 identifies that plan making and decision taking should proactively drive and support sustainable economic development to deliver, inter alia; new homes businesses and other development needs of the area and "respond positively to wider opportunities for growth".
- 7.3 The objectives of Camden's LDF policies CS8 and DP13 is to retain viable employment floorspace where possible. Policy CS8 indicates that the Council will safeguard premises that meet the needs of modern industry and employers and seek provision of facilities for SMEs such as managed workspaces. DP13 identifies that "when it can be demonstrated that a site is not suitable for any business use other than B1(a) offices, the council may allow a change of use to permanent residential or community uses".
- 7.4 CPG5 provides further clarification as to the circumstances where a change of use would be acceptable - this states that a change of use may be allowed in the case of older office premises since it is expected that new office accommodation will come on stream within the plan period to meet projected demand (this is confirmed by paragraph 8.8 of the Core Strategy). CPG5 identifies a number of

61-65 Charlotte Street – Planning Statement

criteria to be taken into account when assessing applications for change of use of B1 to a non-business use - these include factors such as age and condition of the premises, location and supply/demand characteristics.

- 7.5 In terms of the above, the premises are not considered suitable for any use other than B1a offices and therefore are considered suitable for release for alternative use.

Supply and Demand Considerations

- 7.6 In terms of the above considerations, a commercial market report and accompanying letter from local agents Robert Irving Burns identifies a readily available supply of comparable office floorspace in the Fitzrovia area (circa 8,000 sq.m) demonstrating that the proposals will not have a detrimental impact on the overall supply of B1 offices.

Age and location of office floorspace

- 7.7 The existing office premises are not considered suitable for other than B1a office use. The Georgian properties do not provide efficient office spaces that meet modern requirements. The office floorspace due to age and layout provide small inefficient, cellular type office spaces.
- 7.8 The ground floor and basement accommodation at 61 Charlotte Street is cellular in layout and split into a number of different spaces and occupying different levels of the basement.
- 7.9 The office uses at ground floor level do not add to the vibrancy of the Charlotte Street area and the Central London Area.
- 7.10 Robert Irving Burns (RIB) in their supporting letter identify that:
- The ground floor and basement, due to the levels of natural light and variation in the floor levels, are more suited to A1 retail use;
 - In terms of the existing office premises at nos. 61 and 63 Charlotte Street, in the current condition, it would be difficult to let to an office tenant and even with significant investment in the property it would not guarantee a higher rental return; and
 - In terms of the suitability of the premises for occupancy by SMEs, RIB advise that SMEs normally seek short term lease arrangements including flexibility to expand and contract within business premises and would normally look to the serviced office market which supply flexible lease arrangements. There is a competitive supply of serviced offices in the surrounding area. For these reasons it would be difficult for the owner to secure a longer term let for an SME within the existing premises.
- 7.11 In terms of the policy tests of CPG5, it has been demonstrated that the premises are not suitable for other than B1a office and there would be significant challenging in securing longer term tenants within the SME sector.
- 7.12 The proposed change of use of offices to provide a mixed use development is therefore considered acceptable in terms of Camden's adopted policies DP12, CS8 and CPG5.

61-65 Charlotte Street – Planning Statement

Economic Development Considerations

- 7.13 78% of the existing office floorspace is currently vacant including the ground floor of 61 Charlotte Street.
- 7.14 In accordance with the NPPF, retail and town centre uses are included within the definition of economic development. The proposals will result in very tangible economic development and benefits for the locality thus maximising on opportunities for growth within the area.
- 7.15 Based upon evidence of employment densities for older buildings and the inefficiency of the layout of the existing floorspace, we would expect and employment density of between 1 employee per 18 or 20 sq.m of office floorspace (based on GIA). This equates to an expected 34-37 jobs from the existing office floorspace.
- 7.16 By comparison the proposed retail floorspace would be expected to generate an employment density of 1 employee per 19 sq.m for a central location (based on GIA). We expect the current proposals could provide 37 full time equivalent positions. For retail uses we can also expect shift patterns which will further boost the potential employment figures – we have conservatively assumed 2 shifts per day (although we could expect 2 or 2.5 in a central London location). The shift patterns would result in an expected 65 -70 full time equivalent positions in total – an increase in the potential number of jobs compared to the existing floorspace if fully let.
- 7.17 In addition to the expected job generation, our client is committed to the delivery of an apprenticeship within the retail trade. Discussions have taken place with Fitzrovia Youth in Action and Camden's planning and economic development officers.
- 7.18 The proposed development will bring back into use a vacant ground floor and basement unit, and provide a high quality mixed use retail offer that will generate additional footfall along the Charlotte Street area to the benefit of other local businesses.

Conclusion on Loss of Office Floorspace

- 7.19 It has been demonstrated in both the Planning Statement and Letter and Commercial Market Report by Robert Irving and Burns that given that the existing premises are not suitable for other than B1(a) offices, the assessment of their suitability for uses as SMEs and the availability of alternative supply of suitable B1a premises and premises for SMEs that the proposed change of use from offices is acceptable in terms of Camdens policies DP12, CS8 and CPG5.
- 7.20 In addition, retail uses are also considered within the definition of economic development as identified by the NPPF. The NPPF identifies the policy objective of delivering new jobs and homes. The proposals will result in the increase in the provision of new jobs compared to the existing in addition to new homes and importantly an apprenticeship for a local person will be created.
- 7.21 The proposals will also result in a number of regenerative impacts along this stretch of Charlotte Street including an increase in footfall to the benefit of other local businesses.

61-65 Charlotte Street – Planning Statement

Design, Conservation and Heritage Considerations

- 7.22 Due regard has been given to the heritage context of the existing property in developing the application proposals including the site's location within the Charlotte Street Conservation Area. The property is identified as a positive contributor to the character of the Conservation Area and as such it is considered an undesignated Heritage Asset.
- 7.23 The proposals have been informed by the advice of an historic building's expert at an early stage (the Heritage Collective). Principally this has included the advice that the existing butterfly roof should be retained as it forms part of a terrace that contributes to the character of the Conservation Area.
- 7.24 Opportunities to improve the external appearance of the properties have been optimised including replacement windows to the upper floors of no. 61, that are more traditional and in keeping with the character of the area. Replacement shopfronts are also proposed across nos. 61-65 which have been carefully designed by Hugh Cullum Architects in conjunction with the Heritage Collective, again to respect and enhance the character of the area. The approach to design and conservation is fully explained within the Design and Access Statement and the Heritage Statement submitted in support of the planning application.
- 7.25 Whilst planning permission is not required for internal changes within the premises, the applicant has sought to retain traditional features of the building layout including the retention of the majority of the party walls between nos. 61 and 63.
- 7.26 The proposals have been designed to meet Equality Act 2010 requirements in terms of access.
- 7.27 In conclusion, the proposals are considered acceptable in terms of Camden's policies DP 24, 25, 30 and CS14, London Plan policies 7.6 and 7.8 and the NPPF.

Residential Considerations

- 7.28 The proposed development will deliver a mix of unit sizes (2 x 2 bed and 1 x 3 bed) in accordance with Camden's adopted policies DP5 which prioritises 2 and 3 bedroom units.
- 7.29 The proposals do not trigger the requirements for affordable housing.
- 7.30 The development proposes a high quality of residential accommodation with all units exceeding London Plan minimum unit size standards and achieving lifetime homes standards. The proposals are therefore in accordance with Camden's adopted policies CS6 and DP6 and London Plan policy 3.5.

Noise and Amenity Considerations

- 7.31 The Acoustic Report submitted as part of the application assesses the ambient noise levels in the surrounding area and sets out robust noise standards that any plant machinery will need to meet. The plant/extraction machinery to be incorporated within the proposed development has not yet been specified however, it is intended that it will meet the prescriptive noise standards set by the

61-65 Charlotte Street – Planning Statement

Acoustic Report. Further details can be submitted to Camden for approval - this can be dealt with as a condition to the permission.

- 7.32 The separation between the residential and restaurant uses will also need to meet stringent Building Regulations standards for noise insulation. As above, these details can be provided to the Council at an appropriate stage and dealt with by condition.

Sustainability

- 7.33 A BREEAM pre-assessment has been submitted as part of the application for both the residential and retail elements indicating that a Very Good rating level is achievable and will be targeted for both.
- 7.34 The Energy Statement submitted as part of this application sets out that the proposals identifies that the proposals will result in a 46% reduction in CO2 emissions across the site. The proposals are therefore considered to be in accordance with the NPPF, London Plan policies 5.3 and 5.4 and Camden's adopted policies DP22 and CPG3.

Transport

- 7.35 The site has a very good PTAL rating of 6, which indicates that it is highly accessible by public transport. Goodge Street station is located a short walking distance from the site, whilst Warren Street and Tottenham Court Road stations are a further walking distance to the east and west of the site. Bus services are available from Tottenham Court Road and Goodge Street.
- 7.36 No off street car parking is currently provided and none is proposed.
- 7.37 In accordance with Camden's adopted cycle parking standards secure facilities for 4 bicycles will be provided for the residential element. It is not practicable to provide cycle parking for visitors to the retail element, it is envisaged that a contribution towards the provision of additional cycle parking facilities in the area could be a potential solution.
- 7.38 A Delivery and Servicing Report submitted as part of the application identifies that the proposals are not anticipated to have any unacceptable impacts on Charlotte Street and the surrounding area.
- 7.39 The proposals are therefore considered to be in accordance with the NPPF, London Plan policies 6.3 and 6.13 and Camden's adopted policies DP16 and DP18.

Public Realm and Open Space

- 7.40 Whilst it is not possible to provide new open space as part of the proposals, the applicant is committed to exploring opportunities to contribute to the improvement to existing areas of open space within the Fitzrovia area, particularly the provision of new 'sitting out' spaces e.g. pocket parks and the provision of new landscaping and seating areas. This has been discussed with Officers through the formal pre-application process including the potential to contribute initiatives identified in the Fitzrovia Open Space and Public Realm Study.

61-65 Charlotte Street – Planning Statement

8.0 Conclusion

- 8.0 This planning application proposes the creation of a unique and independent retail offer at basement level of no. 61, 63 and 65 and ground floor level of nos. 61 and 63. The proposals have been developed in response to the pre-application advice with Camden's Planning and Conservation Officers and extensive consultation with local stakeholder groups. The proposals have been amended throughout the design development process including; the retention of no. 65 as a separate retail unit at ground floor level, reduction in the size of the retail element and reduction in the proposed level of A3 floorspace within the proposals.
- 8.1 It has been demonstrated that the proposals will not have any detrimental impact on the character of the Charlotte Street or wider area in retail terms and furthermore that the A3 element will be carefully managed through a series of planning controls.
- 8.2 It has been demonstrated that the proposed redevelopment of office floorspace is acceptable in terms of Camden's adopted policies CS8 and DP12 including that the premises are better suited to retail use at ground floor and basement level and the upper floors are not suited to other than B1 office use. It has also been demonstrated that it would be difficult to let the upper floors to SMEs on a longer term basis given current market preference. The proposals will not result in any detrimental impact on the supply of B1 offices in the area.
- 8.3 The proposals will introduce new, high quality residential accommodation which is identified as a priority use by Camden's adopted policy.
- 8.4 The proposals will also result in a number of tangible benefits for the local community including a contribution towards the improvement of existing open space within the area and the provision of an apprenticeship for a local person as part of the retail proposals.
- 8.5 The external changes to the property will enhance and conserve the character of the Conservation area.
- 8.6 The proposed development will not have any adverse impact on the surroundings in terms of noise disturbance, privacy or daylight and sunlight and accord with all levels of policy.
- 8.7 The proposals will be fully accessible in line with the requirements of the Equality Act 2010 and Part M of the Building Regulations.
- 8.8 The proposals will achieve the highest standards of sustainable design and construction through a series of building design and energy efficiency measures. This includes BREEAM Very Good for the entire development.