

**65-75 Monmouth Street and 1-5 Shelton Street,
London, WC2**

Supporting Planning Statement

Planning Portal Ref: PP-02204221

London Borough of Camden

P4518

September 2012

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Planning

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1.0 Introduction

1.1 Summary

- 1.1.1 This application follows the recently withdrawn applications (2012/3573/P and 2012/3628/L) for the dual/ alternative use of the second, third and fourth floor to provide nine residential units, alterations to the ground floor retail units and ground floor frontages and relocation of lift and stair core. The applications were withdrawn following concerns from officers that insufficient marketing material was provided to justify the loss of office accommodation.
- 1.1.2 Following the withdrawal, our client has obtained additional marketing information which illustrates the extent of the marketing and lack of demand of the existing office floorspace. The marketing evidence is submitted separately and discussed in further detail below.
- 1.1.3 In addition, our client has reviewed the proposal and seeks the straight change of use from office to residential use on the third and fourth floors only. This application has omitted the 'dual use' and all the external alterations to the shopfronts and the internal link between 69 and 71 Monmouth Street. It has also omitted the proposal to change the use of the second floor to residential use. This application is therefore a scaled down version of the previous application and only seeks to change the use of the third and fourth floor from office to residential use.
- 1.1.4 We consider the revisions to the scheme and the additional marketing evidence has addressed officers concerns and we therefore trust will be supported by officers.

1.2 Planning Statement

- 1.2.1 This planning statement has been prepared on behalf of our client Shaftesbury Covent Garden Ltd in support of a planning and listed building application for:
- The change of use of the third and fourth floors from office (Class B1) to residential (Class C3) use.
 - Associated internal alterations in association with the residential units.
 - Slight repositioning of the lift and new stair core to the upper floors to improve access to the residential units.
- 1.2.2 In preparing this application, the applicant is making a commitment to deliver a high quality development which will contribute to the provision of high quality housing for the Borough.
- 1.2.3 The purpose of this statement is to examine the planning and listed building issues raised by the current development proposals for the building. In particular, this statement identifies and describes the key opportunities presented by the proposed development.
- 1.2.4 The statement also provides a comprehensive analysis of the relevant planning policy framework at national, strategic and local levels.

1.3 Supporting Application Documents

1.3.1 This planning statement should be read in conjunction with the following additional documents, which accompany the application:

- Heritage, Design & Access Statement – prepared by Rolfe Judd Planning Ltd
- Sustainability Statement – prepared by Fresson & Tee
- Lifetime Homes Assessment – prepared by Fresson & Tee
- Eco-homes Pre-Assessment – prepared by MTT/SUSTAIN
- Marketing Evidence – prepared by CFK
- Application Drawings – prepared by Fresson & Tee

2.0 The Application Site and Surrounding Area

2.1 Site Description & Location

2.1.1 The property comprises number 65-75 Monmouth Street and 1, 3, 5 Shelton Street, which combined is known as St Martin's House. The property is a corner building with a frontage along Monmouth Street and Shelton Street. The property currently comprises a mix of retail uses on the ground and basement floors and office use on the upper four floors.

2.1.2 Number 65-71 Monmouth Street within St Martin's House is Grade II Listed. Number 65-71 Monmouth Street comprises individual ground floor retail units however the upper floors are open-plan and are linked to the whole of St Martin's House. The remainder of the property i.e 73-75 Monmouth Street and 1, 3, 5 Shelton Street are not listed as these properties were completely redeveloped in the 1980's and therefore contain no original fabric or heritage importance.

2.1.3 The building was completely refurbished and partially reconstructed in 1987 to provide retail on the ground floor, office accommodation on the 1st-3rd floors and residential use in the new fourth floor. Since the redevelopment, the property has undergone substantial internal and external redevelopment and reconfiguration with many of the individual retail units on the ground floor being linked together internally.

2.1.4 Although the ground floor units appear separate externally, most of the retail units have been knocked-through internally and have a frontage on both Monmouth Street and Shelton Street.

2.1.5 The upper floors of the building were completely opened up during the 1987 refurbishment and comprise open plan office accommodation across all properties. During the conversion all internal partitions and fabric was removed. No fabric of any merit remains in the upper floors of the building. The majority of the upper floor office accommodation has remained vacant for a considerable length of time.

2.1.6 Access into the upper floors office is via the office reception area within 69 Monmouth Street or 5 Shelton Street.

2.1.7 The property is within Seven Dials Conservation Area and Central London Area.

2.2 Surrounding Area

2.2.1 The property is located within the 'Seven Dials' area of Covent Garden and within close proximity to Leicester Square, Long Acre and Shaftesbury Avenue. The surrounding area is therefore characterised by a wide range of uses including retail, restaurant, office, residential, theatres and public houses.

2.2.2 St Martin's House is immediately adjacent to Ching Court which comprises retail on the ground floors and primarily residential or office use on the upper floors. The property is also opposite the recently developed St Martin's Courtyard scheme which comprises a mix of retail, restaurant and residential uses.

2.3 Relevant Planning History

2.3.1 The property has been subject to many internal alterations and change of use applications since the redevelopment in the late 1980's including:

- Replacement of louvered floor and glazed fan lights to shop units at 9 Shelton Street (2011/1998/P)
- Insertion of a partition wall within the basement and ground floor of 65-67 Monmouth Street (2011/2001/L).
- Insertion of a partition wall within the ground floor shop unit of 65 Monmouth Street (2009/5813/L)
- Change of use of ground and basement from offices to Class A1 and minor alterations to shopfronts on 69-75 Monmouth Street (2004/3440/P).
- Internal and external alterations including the formation of new staircases, installation of internal partitions and re-glazing of shopfronts to Monmouth Street elevation. (2004/3442/L). (Listed Building Consent was required for works to 69-71 Monmouth Street only).
- A planning permission for alterations to the ground floor frontage at 73-75 Monmouth Street was approved in August 2012 (2012/2909/P).

3.0 Relevant Planning Policies

3.1 National Planning Policy Framework (2012)

3.1.1 The scheme has been assessed against National Guidance in the form of the National Planning Policy Framework which was adopted in March 2012. The NPPF seeks to make the planning system less complex and more accessible, to protect the environment and to promote sustainable growth. The document brings together in a single document all the previous national planning policy advice notes.

3.1.2 At the heart of the NPPF is a presumption in favour of sustainable development. The NPPF recognises that there are three dimensions to sustainable development: economic, social and environmental.

3.1.3 Policy 6 of the NPPF encourages Local Planning Authorities to 'boost significantly the supply of housing'. This application provides five high quality homes for the borough.

3.2 London Plan (2011) Policies

3.2.1 London Plan Policy 3.3 *'Increasing Housing Supply'* seeks to increase London's supply of housing and sets a London-wide target of 32,210 additional homes per year until 2015/2016. The policy recognises the pressing need for more homes in London in order to promote real choice for Londoners.

3.2.2 London Plan policy 3.4 looks to optimise housing potential taking into account local context, character, design and public transport accessibility and should optimise housing output for different types of location within relevant density range. The scheme complies with this policy by providing a range of residential unit sizes which have been designed to achieve optimum layout within a difficult building shape. The design of the residential units is considered to improve the visual appearance of the property when viewed from street level. Providing residential on the upper floors is considered to improve the character and design of the building by reintroducing a cellular arrangement which is more in-keeping with the original appearance of the building.

3.3 Camden's Development Policies (2010-2025)

3.3.1 **Policy DP2** seeks to maximise the supply of additional homes in the borough. The proposal complies with this policy by providing five high quality residential units for the borough.

3.3.2 **Policy DP5** seeks homes of different sizes. The proposal complies with this policy by providing 3 x one bedroom flats, 1 x two bedroom flats and 1 x 3 bedroom flat. We consider the scheme provides an acceptable mix of unit sizes for the central London location of the property.

3.3.3 **Policy DP6** seeks that all development should meet lifetime homes standards. In support of the application a lifetime homes assessment has been submitted which indicates how the Lifetime Homes Criteria have been addressed. The residential units have been designed to be easily adapted to meet lifetime homes standards.

3.3.4 **Policy DP13** seeks to retain buildings that are suitable for continued business use. We can confirm that the majority of the office space has been vacant for a considerable length of time with no interest from office tenants. The majority of floors have been vacant since approximately 2009. The fourth floor has been vacant for considerably longer. Our client's managing agents consider the property is surplus to requirements. We consider the property presents the ideal opportunity to convert a long-standing, partially vacant building into residential accommodation which is a key priority for the Borough.

3.3.5 **Camden Planning Guidance 5 (Town Centres, Retail and Employment)** sets out the requirement of marketing evidence to justify the loss of employment uses in line with Policy DP13. We consider the marketing criteria set out within DP13 and CPG5 has been addressed for this property as follows:

- A reputable agent has advertised the floorspace for over 18 months. Details of the marketing have been provided with the application.
- A visible letting board has remained on the property.
- The office accommodation has been published on the internet since March 2011 and is still available to view.
- The letting board has been erected for the duration of the marketing.

- It is pertinent to note that the guidance within CPG5 states '*We will consider shorter marketing periods for B1(a) offices premises*'. The property has been actively marketed for over 18 months which we consider is a sufficient marketing period to demonstrate the lack of demand. Our client is keen to bring the building back into use and considers residential use to be the most appropriate use for this building.
 - The advertised rents have been reasonable and reflect the local area and condition of the property.
- 3.3.6 In support of the application, additional marketing information has been provided which identifies the length of marketing, the interest shown in the building and why the interest was not pursued.
- 3.3.7 **Camden Planning Guidance 5 (part 6)** confirms that there are a number of considerations that are taken into account when assessing application for a change of use from office to a non-business use including the quality of the premises for continued office use and demand of office space in this location. We can confirm that during the 1980's redevelopment of the building, the fourth floor was built as a residential penthouse flat. The flat changed to office use in circa 2006 when the office tenants on the lower floors expanded into the fourth floor. The layout of the fourth floor was not designed for office use and is not favourable for continued office use. There are very low, sloping ceiling and a warren of small office suites. The corner of the property towards St Martin's Lane is very narrow and does not have a traditional office layout.
- 3.3.8 Likewise, the layout of the third floor (which is triangular and very narrow towards St Martin's Lane) is irregular and not favourable of office use. The internal layout is difficult to space plan and inefficient for modern office occupiers.
- 3.3.9 We are also aware through our clients managing agents that there are a large number of buildings offering small suites available in the Covent Garden area. A recent committee report for the 'Centre Point' application highlighted that there is approximately 113,000sqm of office accommodation in the pipeline and approximately 83,000sqm of second hand space available to lease Soho/ Bloomsbury area of Camden. We therefore consider that the small loss of 'vacant' office space, which is proposed to be replaced with high quality residential accommodation, will not have a detrimental impact on the available of office stock for the Borough.
- 3.3.10 We also consider it important to stress that Camden's policies play a high demand on new residential accommodation for the Borough. We consider sufficient marketing has been provided to demonstrate that there is no demand for the office accommodation however we are providing the Borough with additional, high quality residential accommodation.
- 3.3.11 The proposal is a car-free development and fully in accordance with **Policy DP18** which seeks to ensure that developments provide the minimum necessary car parking provision. Five secure cycle spaces are provided (one for each flat) in the basement.
- 3.3.12 Listed Building **Policy DP25** seeks to preserve or enhance the borough's listed buildings by only granting 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 would not cause harm to the setting of a listed building. 65-71 Monmouth Street is the only listed part of the building. We can confirm that the proposed residential scheme is sensitive to the listed parts of the building and only makes minor alterations comprising the installation of internal partitions and fixings to create individual flats.
- 3.3.13 The access to the offices and proposed residential flats will continue to be via 69 Monmouth Street (which has level access) or 5 Shelton Street. No alterations are proposed to either access. The entrances will remain as existing.

- 3.3.14 The proposed residential units are provided through a conversion of an existing building rather than a new build so there are natural restrictions against sustainability i.e the existing building fabric will be retained. Nevertheless, the scheme has been designed in accordance with Camden's guidance on housing and a lifetime homes assessment, sustainability statement and eco-home assessment have all been submitted in support of the application.
- 3.3.15 The proposal has been designed to fully comply with the residential development standards within **Camden's Housing Planning Guidance CPG2**.

4.0 The Proposal

4.1 The Proposal

4.1.1 This application seeks planning and listed building consent for:

- The change of use of the third and fourth floors from office (Class B1) use to provide five residential (Class C3) apartments.
- Associated internal alterations in association with the residential units.
- Slight repositioning of the lift and stair core within 69 Monmouth Street/ 5 Shelton Street.

4.1.2 The five proposed residential units are arranged over the third and fourth floor as follows:

- Third Floor – 3 x one bed flats and 1 x two bed flat
- Fourth Floor - 1 x 3 bed flat

4.1.3 We can confirm the flat sizes are as follows (all gross internal areas):

- Flat 1 – 3 bed: 206.2 sqm
- Flat 2 – 1 bed: 85.6 sqm
- Flat 3 – 1 bed: 49.5 sqm
- Flat 4 – 2 bed: 71.5 sqm
- Flat 5 – 1 bed: 50.0 sqm

4.1.4 Policy DP5 seeks a range of housing sizes within housing developments. The scheme provides 3 x one beds, 1 x two bed and 1 x 3 bed flats. The provision of residential accommodation in this property is achieved through a change of use rather than a new build housing development. The policy justification states, *'We will expect proposals to include some dwellings that meet the very high priorities wherever it is practicable to do so. The mix of dwellings sizes appropriate in a specific development will be considered taking into account the character of the development, the site and the area'*. The proposal provides two 'high priority' flats however the existing triangular floor-plan of the property provides restrictions for the remaining flat layouts.

4.1.5 The property is within Seven Dials which has a busy late night economy where larger family units are unlikely to be in demand or occupied. Furthermore, there is no potential to provide outdoor amenity space within the development, and

there is very little play-space close to the property. In addition, the homes have direct access to a busy road. We therefore consider the location is unsuitable for additional family accommodation.

- 4.1.6 We can confirm that all the flats exceed Camden's minimum size standards and have attractive layouts. All the habitable rooms have natural light through the existing windows.
- 4.1.7 There are two existing entrances to the upper floors; either 69 Monmouth Street or 5 Shelton Street. It is proposed to retain both these entrances for the office and residential accommodation.
- 4.1.8 The first and second floor office (Class B1) accommodation does not form part of this planning application. The existing lawful use is office and we therefore consider the continued use as offices to be acceptable. The first and second floor plans are provided to illustrate the relocation of the lift and stair core which forms part of the listed building application.
- 4.1.9 We set below the proposal on a floor by floor basis:

4.2 Basement Floor

- 4.2.1 At basement level, it is proposed to replace the existing plant room area along Shelton Street with a residential bike store, waste/ recycling stores for the residential flats and space for gas/electric meters for the property. The basement store area is accessed via the new stair or lift within 5 Shelton Street.
- 4.2.2 Space has been allocated for five bike stands in the basement, one space for each flat.

4.3 Ground Floor

- 4.3.1 At ground floor level the following works are proposed:
- Relocation of existing lift towards Shelton Street to allow the lift and stairs to continue to fourth floor level.
 - Reconfigured stair from ground to all upper floor levels within 5 Shelton Street.
 - Access into the property will remain as existing.

4.4 First and Second Floor

- 4.4.1 The first and second floors do not form part of the planning application. The first and second floors will remain as existing office (Class B1) accommodation. The floors are included for the listed building application only. The staircase and lift core is relocated towards Shelton Street on each floor to allow the lift and stairs to continue to fourth floor level.

4.5 Third Floor

- 4.5.1 Three x one bedroom flats and 1 x two bed flat is proposed on this level. All flats exceed Camden's minimum size standards. All habitable rooms have windows to allow natural light and ventilation.
- 4.5.2 The new stair and lift core continues to access the four flats.

4.5.3 The existing staircase in number 1 Shelton Street is reconfigured to provide an emergency escape stair from the penthouse flat on fourth floor level.

4.6 Fourth Floor

4.6.1 A three bedroom penthouse flat is proposed at fourth floor level. The fourth floor was originally approved and built as residential flat and the scheme therefore returns the fourth floor back to its original use. The flat exceeds Camden's minimum size standards.

4.6.2 A winter garden with roof-lights above is proposed at the eastern end of the floor, overlooking Ching Court. The garden provides a small amount of amenity space for the family sized dwelling.

4.6.3 We can confirm that the left and stair relocation, the layout of the flats on the third and fourth floor and the design of the winter garden remain exactly as per the withdrawn scheme. The design of these elements was considered acceptable by Camden's design officers for the previous scheme and we therefore consider should remain acceptable for this application.

4.7 Area Schedule

Use	Existing Area (sqm)	Proposed Area (sqm)	Change (+/-)
Office (3rd & 4 th Floors)	622	0	-622
Residential (3 rd & 4 th Floors)	0	622	+622
Total	622	622	0

4.8 Heritage, Design & Access Statement

4.8.1 The scheme has been sensitively designed to protect the appearance of the listed buildings within the scheme and conservation area. Internally, the scheme primarily comprises the relocation of the stair and lift core to improve access to the upper floors. The open plan office space on the third floor is replaced with residential units. The fourth floor is converted back into its original use as a single residential dwelling. It is considered that converting the upper two floors to residential use will bring the property back to its original use. It is considered an established conservation practice to revert the buildings, especially listed buildings, back to the original uses with retail on the ground floor and residential on the upper floors.

4.8.2 The internal design of the residential units follows Camden's supplementary planning guidance to ensure the units are of a high design standard. All units comply with Camden's size standards and have natural light into all habitable rooms. All flats have separate living rooms/ kitchens with adequate storage throughout.

4.8.3 Please also refer to the submitted Heritage, Design & Access Schedule.

4.9 Lifetime Homes Assessment

4.9.1 In support of the application a lifetime homes assessment has been prepared and submitted with the application. The assessment indicates the design measures to achieve lifetime homes.

4.10 Sustainability Assessment

4.10.1 A sustainability statement has been submitted in support of the application. The scheme is a conversion of an existing building rather than a new build however the scheme has been designed to be as sustainable as possible. The following sustainability measures have been provided:

- The proposal makes maximum use of the existing buildings external and primary structure.
- Waste produced from the internal strip-out will be sorted and recycled where possible.
- The roof will be retained but stripped and recovered to ensure breathing roof felt has been used for thermal insulation for the top floor dwelling.
- The existing windows are retained and redecorated.
- Secondary glazing is proposed to provide draft proof and boost thermal and acoustic performance.
- Energy efficiency light-fittings will be used with controlled sensors and/or timers in the common parts.
- The walls are to be upgraded with insulation lining to meet Part L.
- Bathrooms have dual flush to reduce amount of water.

4.11 EcoHomes Assessment

4.11.1 An Eco-Homes Assessment has been prepared by MTT/SUSTAIN in support of the application. The report confirms that an EcoHomes 2006 pre-assessment has been undertaken which demonstrates that a rating of 'Very Good' can be achieved for the development.

5.0 Conclusion

5.1.1 This planning and listed building application proposes the change of use of the third and fourth floors from office (Class B1) use to residential accommodation (Class C3), internal alterations associated with the change of use and slight relocation of the lift and stair core to improve access.

5.1.2 The proposal is sensitive to the design of the existing building, the listed buildings within the scheme and surrounding conservation area.

5.1.3 The five residential units comply with Camden's residential design standards and will create high quality residential flats for the borough.

5.1.4 The development strongly reflects the strategic policies set out within Camden's Local Development Framework, particularly in terms of providing additional housing for the borough and retaining the existing commercial uses within the lower floors of the property.

5.1.5 We trust the submitted information is sufficient to validate our clients application however should you have any questions please do not hesitate to contact us

