

GL/P4563
7th November 2011

London Borough of Camden
Town Hall
Argyle Street
London
WC1H 8ND

Dear Sirs

**Proposed Change of use of the first to third floors from Class D1 (educational use) to 3 x 2 bed residential units at 63 Shelton Street, WC2
PP ref: 01690755**

On behalf of Taracrest Ltd, please find enclosed a planning application for the conversion of the first to third floors from Class D1 education floorspace to three residential units at the above property and retention of Class D1 use at lower ground and ground floor.

The application is submitted following pre application correspondence with Carlos Martin in August 2011.

The documentation has been submitted via the planning portal and includes the following:

- A cheque for £1005.00, this being the requisite planning application fee
- Existing and proposed drawings :
 - 36 SHE/PLA/03C
 - 36 SHE/PLA/02G
 - 36 SHE/PLA/04A
- Design and access statement
- Site location plan
- Planning statement
- Documental marketing evidence
- Lifetime Homes Standards report

Site Description and Location

The application site is situated on Shelton Street and lies between the tube stations of Covent Garden, Leicester Square and Holborn. The current occupiers are the Edgware Academy language school. The building is a purpose built office block circa 1950's. The building comprises a lower ground, ground and three upper levels; all used for Class D1 purposes. There is an enclosed service yard to the rear of the property. The development site is not listed but is located within the Seven Dials conservation area. The overall site area measures approximately 72sq metres.

Architecture Planning Interiors

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The surrounding area is predominately commercial with residential on many of the upper floors. The site is in a good accessible location, with on street parking controls and has a high PTAL: rating of 6b as confirmed by Transport of London

Planning History

Planning permission was approved (ref PSX0104693) for a change of use from offices (Class B1) and retail unit (A1) to education and training college (Class D1) on the 17th October 2001.

Proposal

Edware Academy are the current owner/occupiers of the building and are moving to nearby premises as it has become apparent over recent years that the accommodation at Shelton Street is no longer adequate for their needs or aspirations.

The School is split across 5 floors of this 1950's building and though it has a lift it does not provide the modern day standards or facilities for disabled staff and/or students. The interior of the building is dated and is costly to maintain. The layout of each floor is limited and the classrooms are small. They are considered inadequate to meet the regulations associated with modern education standards. A letter from the Academy accompanies this application and supports the above.

The proposal involves the conversion of existing Class D1 floorspace to provide 3x2 bedroom units on the upper levels of the building. The scheme will be a car free development. It is proposed to retain Class D1 use at the lower ground and ground floor levels (as advised by officers during pre application discussions) with a change of use to residential use on the first, second and third levels. The two bedroom units measure between 56.7sqm to 64.9 sqm and meet the Council's space standards for residential units.

Pre-application correspondence was conducted with council officers in order to establish the, parameters and principles of the proposed scheme. The principle of the change of use of the upper floors was accepted provided sufficient marketing exercise was submitted with the application.

The development has been designed to comply with approved Document Part M of the Building Regulations to embrace best practice and to enhance everyone's experience of living or visiting the residential development. The residential units are built to 'Lifetime Home' standards where possible. The stairs within the units are compliant with Approved Document Part M of the Building Regulations. Further detail is provided in the Access Statement that accompanies this planning statement.

Planning Considerations

Reduction of Class D1 floorspace

Core Strategy policy CS10 seeks to protect and provide for the community needs of the borough. Policy DP15 states that *"the Council will protect existing community facilities by resisting their loss unless the specific community facility is no longer required in its current use. Where this is the case, evidence will be required to show that the loss would not create, or add to, a shortfall in provision for the specific community use and demonstrate that there is no demand for any other suitable community use on the site"*.

Supporting evidence from the existing occupier/owner and local agents confirm that the building's layout and condition does not meet disabled access needs or standards required for education institutions. The internal space configuration is cumbersome and does not meet the requirements of

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those seeking open plan spaces which are more desirable for those seeking space for community uses/functions.

Notwithstanding the above, The Academy has known for some time that the building was not meeting their needs or the emerging standards and requirements for education institutions. In February 2009 they instructed agents to market the entire building for let for Class D1 use at a reasonable price. The marketing exercise ended in October 2009 due to lack of interest. What interest the building did attract from a Class D1 user was swiftly rejected due to the building's internal condition and layout. Documental evidence submitted as part of this application confirms the agent's instruction to market the site in February 2009 together with the marketing particular.

The Academy has since found new accommodation nearby and decided to sell the building in May 2011. In the past six months there has been again a lack of interest from Class D1 users in wishing to purchase the building.

Agent advice (EA Shaw and T.P Gale letters attached) support the unmarketability of the unit for Class D1 use and suggest the more preferred use would be offices with residential above in this particular location of Central London.

As suggested by the Council at pre application stage Class D1 use will remain at basement and ground floor level and a marketing exercise will continue to be conducted to let these two levels for educational, health and community uses.

To conclude it is clear that the building is not an attractive prospect for a Class D1 user and is restricted by the following:

- cramped room sizes
- number of floor levels (5)
- no daylight in the basement
- lack of facilities
- lack of modern disabled facilities
- the lift is dated and unreliable
- cost of refurbishment/investment
- size

The loss of the first to third floors of this building will therefore not result in a shortfall of Class D1 space in this part of the borough as further confirmed by the lack of interest during marketing periods as noted above.

New Residential Development

Housing is considered the priority land-use of the Local Development Framework. Core Strategy CS3 focuses on highly accessible areas and that these areas are considered to be suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities and are particularly suitable for uses that are likely to significantly increase the demand for travel. Core Strategy CS6 focuses on providing quality homes and that the Council will aim to make full use of Camden's capacity for housing by maximising the supply of additional housing to meet or exceed Camden's target of 5,950 homes from 2007-2017, including 4,370 additional self-contained homes and maximising the supply of additional housing over the entire plan period to meet or exceed a target of 8,925 homes from 2010-2025, including 6,550 additional self-contained homes.

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Housing Policy DP2 aims to encourage the provision of more housing and that the Council will seek to maximise the supply of additional homes in the borough by resisting alternative development of sites considered particularly suitable for housing.

The Core Strategy states that *'The Council aims to close the gap between housing demand and supply by minimising the net loss of existing homes, and by regarding housing as the top priority when considering the future of unused and underused land and buildings.'*

The Council accepts that not all potential housing sites can be identified in the Sites Allocations documents and therefore small sites may come forward through the life of a development plan which have not been identified but are suitable for housing. Core Strategy policy CS6 sets out the Council's objectives in relation to affordable housing and the threshold for providing affordable housing is for schemes that exceed 10 units. The scheme proposes 3 units and hence the provision of affordable housing is not applicable.

Housing Mix

The conversion scheme proposes 3x 2 bedroom units. Each of the two bed units will be accommodated on the first, second and third floors accordingly as the configuration of the building lends itself to comfortably accommodate a unit per floor which meets the Council's space and design standards. The Council have acknowledged in pre application correspondence that there is a shortfall of 2 bedroom units in the borough.

Policy DP31 seeks the provision of, and improvements to open space and recreation facilities. The Council acknowledge that land is limited in the borough to provide open space and recreations facilities as part of new schemes could be limited the Council considers that all developments that increase the demand for public open space facilities will be expected to make an appropriate contribution to meeting that additional demand. Schemes considered to increase the demand for public open space are:

- schemes of 5 or more additional dwellings;

The proposed scheme is for 3 units and is therefore below the threshold as noted above.

Parking, Servicing and Traffic Generation

The site has a high PTAL rating of 6b and is accessible by public transport in the form of the three local tube stations (Leicester Square, Holborn and Covent Garden) all within 10mins walk of the site and numerous bus routes.

The Council has acknowledged that due to the site's high PTAL rating the scheme can be justified to be car free. It is acknowledged however that future occupiers will not be entitled to residential parking permits and this will be secured by a legal agreement.

Refuse storage and recycling facilities are internally provided within each flat (as shown on the plans). A communal refuse store is not viable as it would eat into the Class D1 floorspace which is already acknowledged as being unattractive Class D1 space. Reducing the space further would further reduce any prospect for these floors to be let in the future.

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Notwithstanding this however daily refuse collections occur in this part of Westminster hence there is no need for occupiers to store waste prior to a designated day of the week. The space designated for the storage of refuse and recycling in the units is in accordance with Camden's Supplementary Guidance.

LDF policy DP18 promotes the use of cycles as a more sustainable alternative to car use. However due to a lack of space at the commercial floor levels, designated cycle storage can not be provided at ground or basement levels. However bikes can be stored in each of the individual flats.

An example of a case where a scheme has been approved within the Borough without cycle spaces and communal refuse/recycling storage can be seen at 142 Shaftesbury Avenue and 36-38 West Street (2011/1704/P). It was acknowledged that the proposal was a conversion of an existing building which did not have access to any outdoor space and the commercial uses took up the entire lower floors to accommodate such provision.

We trust you have all the necessary information to determine this application positively. Should you seek any further information please do not hesitate to contact me.

Yours faithfully



Grace Liu
Rolfe Judd Planning Limited

cc Gil Levy Taracrest Ltd