

# **PLANNING STATEMENT**

**September 2011**

**7  
UPPER ST MARTINS LANE  
LONDON  
WC2H 9DL**

**Angle Property  
(St Martins) Limited  
&  
Telenomics Limited**

**Matthews  
& Goodman**  
*incorporating Edmund Kirby*

Property Advisers

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## **1. Introduction**

- 1.1 This Planning Statement is prepared by Matthews & Goodman on behalf of Angle Property (St Martins) Limited to support a Planning and Listed Building Consent Application for the alteration and conversion of 7 Upper St Martins Lane, London, WC2H 7DL.
- 1.2 This Statement describes the applicant's proposals for the restoration and regeneration of this Grade II Listed Building, currently vacant, in the heart of the Covent Garden district of Central London. It seeks to justify the applicant's proposals having regard to location, status, planning history, national and local planning policy.
- 1.3 This Planning Statement is one of a suite of supporting application documents and as such should be read in conjunction with the following:
- Design & Access Statement
  - Scope of Work/Method Statement
  - Heritage Statement
  - Lifetime Homes Assessment
  - Acoustic Survey

## **2. Location & General Description**

- 2.1 7 Upper St Martins Lane is located in the heart of the Covent Garden district of Central London, and is bounded by Shaftesbury Avenue to the north, Charing Cross Road to the west and The Strand to the south. The property is situated in a corner location on the south side of Tower Street. It occupies a roughly triangular area of land of 0.02 hectares.
- 2.2 The building, which is currently vacant, dates from the early 19<sup>th</sup> century and comprises six floors including lower ground, ground, and five upper floors. The lower ground and ground floor was previously occupied by a travel agency (Class A1). The upper floors first to fourth floors were occupied as offices (Class B1) and the fifth floor has an apartment.
- 2.3 The building is Grade 2 Listed and is situated in the Seven Dials Conservation Area. 7 Upper St Martins Lane is listed in two parts by English Heritage, Guild House (South Wing)

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and 18 Tower Street referred to as the North Wing. The listing descriptions are included in Appendix 1.

2.4 The wider surrounding environment comprises a mix of use including commercial, retail, leisure and residential. The property is situated in close proximity to a number of key locations in the Capital, for example Covent Garden, West End theatres and the National Gallery.

2.5 The applicant's Heritage Statement identifies that the history of the building use has been one of change, adaptation and alteration. In the 1880's No.7 and No.18 were joined internally to form a single unit and occupied at that time by a coach builder. Before the second world war alterations were undertaken to No.18 to separate it to some degree from the adjacent 7 Upper St Martins Lane and in the 1950s the premises were associated with Nos. 2, 3 and 6 West Street (Guild House). The two buildings were unified with various internal works carried out including the formation of new door openings.

2.6 In 1990 Planning and Listed Building consent was granted for the complete strip out of 7 Upper St Martins Lane and 18 Tower Street. The interior decor and fittings within the buildings all date from this period which included the installation of new floors, new ceilings, staircase and a lift . The party wall separating the two buildings was opened up at that time, but is still in evidence as an internal structural feature. The fourth and fifth floors of the building with mansard roof were also added at this time. The Internal accommodation (GIA), which has not altered from that period comprises:

Basement	111 m <sup>2</sup>
Ground Floor	118 m <sup>2</sup>
First Floor	100 m <sup>2</sup>
Second Floor	100 m <sup>2</sup>
Third Floor	100 m <sup>2</sup>
Fourth Floor	99 m <sup>2</sup>
Fifth Floor	83 m <sup>2</sup>
Total	711 m <sup>2</sup>

2.7 The lawful use of the lower ground and ground is Class A1/A2. The first to fourth floors of the building are Class B1 and the fifth floor Class C3.

### **3. Pre-Application Submission**

3.1 A Pre-application Enquiry was submitted to Camden Council under Reference 7239716 with supporting information and plans of the proposed scheme.

3.2 The applicant met with Council's Conservation Officer and Planning Officer at the application premises on Tuesday 9<sup>th</sup> August 2011. Whilst a formal pre-application response is yet to be received, the key points arising from the applicant's submission and site meeting are set out below.

#### *Principle of Development*

3.3 It was indicated by Officers that the principle of conversion of the property to residential on the upper floor was acceptable subject to demonstrating that the property was unsuitable for office use.

3.4 The proposed ground floor use of the premises for A1/A2/D1 was regarded as acceptable.

#### *External Changes*

3.5 The Council Officers did not take issue with the replacement of the existing shop front or the introduction of a new entrance into the unit frontage providing original elements were maintained and the changes were of a suitable design.

3.6 The Officers supported the general improvements proposed to the rear of the property.

3.7 The Conservation Officer agreed that the windows to the front of the property were not original and noted the requirement for double glazing.

#### *Internal Changes*

3.8 The Officers took no issue with the proposals to locate bin and cycle storage areas in the basement of the building.

- 3.9 The Officers agreed that the main staircase to 7 Upper St Martins Lane was not original and that the proposals to re-orientate the staircase were acceptable.
- 3.10 The Officers requested that further investigations were required to establish whether the staircase at the rear of 18 Tower Street was original and to justify its removal. These investigations and justification are covered in the applicant's Heritage Statement.
- 3.11 The Officers questioned whether the internal party wall between 7 Upper St Martins Lane and 18 Tower Street was probably original. It was agreed that further investigations would require to be carried out to assess its historic significance to the property and this is covered in the applicants Heritage Statement.

#### *Contributions and Obligations*

- 3.12 The Officers confirmed that the development would be "car free" and would require a legal agreement to this effect. The development fell below the threshold level which requires affordable housing or in lieu financial payment. Similarly the development fell below the threshold requiring financial contribution to open space provision.

#### **4. Proposals**

- 4.1 The application proposals seek to create an independent Class A1/A2/D1 unit at lower ground and ground floor level.
- 4.2 The proposals for the upper floors, levels 1, 2, 3 and 4 are to convert the building to residential use. This will include three two bed apartments at level 1 to 3 and one three bed duplex at level 4 and 5. There is an existing apartment on the fifth floor.
- 4.3 The conversion proposals will include the installation of separate entrances at ground floor level providing discreet access to the commercial and proposed residential areas of the building. The existing shop front, which is not original to the building, will be replaced and will include a new entrance from Tower Street to the reconfigured ground floor commercial area. From within the new ground floor commercial area there will be internal access to the

lower ground floor via a new staircase. This will allow the ground floor and lower ground floor to be used by a single occupier. There will be a discreet entrance from Upper St Martins Lane providing access to the residential apartments at upper floor level. This will provide access to a new internal lobby with lift and staircase access to the upper floor apartments.

- 4.4 The internal alterations propose reversing the principal staircase in 7 Upper St Martins Lane in order to create a natural lobby area for the proposed apartments, and to address issues of fire safety. At No.18 Tower Street, the internal alterations include the removal of the rear staircase to provide an extended floor plate for the proposed apartments at upper floor level. The proposal also includes a partial removal of the internal party wall which formerly separated No.18, No.8 and No.7. The alterations of the physical fabric of the building are justified in the applicant's Heritage Statement which forms part of this application.

## **5. Relevant Planning History**

- 5.1 Planning history material to this application includes Planning and Listed Building approvals granted in respect of alterations to the building as well as approvals granted in respect of alterations and conversion of properties in the immediate vicinity.
- 5.2 On the 7<sup>th</sup> June 1990 Camden Council granted Planning and Listed Building consent under reference 1990/9070006 and 9070007 for major renovation and alterations to 18/18a Tower Street including the erection of two storeys at roof level together with a roof extension to provide office accommodation with a fifth floor flat. The extent of internal alterations carried out in the implementation of this scheme were considerable and are described in some detail in this report under the section Location and General Description. As the building still incorporates a flat at 5<sup>th</sup> floor level, the land use changes arising from the applicant's proposal relates only to the conversion of the 2nd, 3rd and 4th floors from office (Class B1) to residential (Class C3) and potential D1 use at ground floor level.
- 5.3 Within the immediate vicinity, change of use approval for the upper floors of buildings from Class B1 to Class C3 has already been established. A number of examples can be cited as evidence that this application will not set a precedent in the area.

- 5.4 On the 13<sup>th</sup> April 2010 Camden Council granted planning permission for the alternative use of the 1<sup>st</sup> floor for either B1 or C3 use at 46 Monmouth Street. This consent was granted under Reference 2010/0559/P relevant details including a location plan showing the proximity of this property to 7 Upper St Martins Lane, are include in Appendix 2 of this report.
- 5.5 On the 13<sup>th</sup> April 2010 Camden Council granted planning permission for the alternative use for the 1<sup>st</sup> floor for either B1 or C3 use at 44 Monmouth Street under reference 2010/0419/P. Relevant details, including a location plan showing the proximity of these premises to 7 Upper St Martins Lane are included in Appendix 3 of this report.
- 5.6 On the 15<sup>th</sup> March 2011, Camden Council granted change of use approval for the 1<sup>st</sup> to 3<sup>rd</sup> floors from office (Class B1) to residential use (Class C3) at 57-59 Monmouth Street under reference 2010/6158/P. This consent was subject to a legal agreement. The corresponding listed building consent approval was granted under reference 2010/6172/L. Relevant details, including a location plan showing the proximity of these premises to 7 Upper St Martins Lane is included in Appendix 4 of this report.
- 5.7 On the 3<sup>rd</sup> March 2008 Planning and Listed Building Consent was granted on appeal at 19-21 Monmouth Street. The proposed development included significant alterations to the building including increasing the height of the elevation brick walls with a roof extension to provide an additional residential unit with a roof terrace. The scheme was amended and approved under reference 2009/3763/L on the 8<sup>th</sup> January 2011. Relevant details are included in Appendix 5 of this report together with a location plan showing the relationship of this property to 7 Upper St Martins Lane.
- 5.8 The above Planning and Listed Building consent approvals are a material consideration, to the determination of this application.

## **6. National Planning Policy Guidance and Statement**

- 6.1 National Policy Guidance Notes and Statements relevant to this application are:
- PPS1 – Delivering Sustainable Development;

- PPS5 – Planning for the Historic Environment;
- PPG13 – Transport;
- Draft National Policy Framework – Published Consultation July 2011.

*PPS1 – Delivering Sustainable Development*

6.2 PPS1 sets out the Government’s general objectives in relation to planning, which is to encourage high quality development in sustainable locations. It outlines a number of key themes that should be addressed to ensure that both development plans and planning decisions contribute to the delivery of sustainable development, including: -

- Social inclusion;
- Protection and enhancement of the built environment;
- Prudent use of natural resources;
- Sustainable development.

6.3 Paragraph 3 of PPS1 identifies that sustainable development is a core principle underpinning planning. The application site is in a highly sustainable location. It is within easy walking distance of tube stations at Leicester Square (Northern and Piccadilly Lines) and Covent Garden (Piccadilly Line) and main rail services at Charing Cross. The site is also within easy walking distance of London’s premier shopping districts at Oxford Street and Covent Garden. It is also adjacent to the West End theatre quarter and other key locations and attractions offered by the Capital City.

6.4 PPS1 goes on to state that local authorities “should seek actively to bring vacant and under used previously developed land and buildings back into beneficial use”. In addition to safeguarding the future of a Listed Building, this proposal brings back into productive use a building which has been vacant and its reuse provides clear benefits for the local community and Seven Dials Conservation Area.

*PPS5 – Planning for the Historic Environment*

6.5 As set out in PPS5, the Government’s overarching aim is that the historic environment and heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations. In delivering these objectives, the Government recognises that

intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term.

- 6.6 The Government seeks to conserve England's heritage assets in a manner appropriate to their significance ensuring that decisions are based on the nature, extent and level of that significance, investigated to a degree proportionate to the importance to the heritage asset.
- 6.7 Policy HE9.4 states that where a proposal has a harmful impact on the significance of a designated heritage asset which is less than substantial harm, in all cases planning should:
- i. Weigh the public benefit of the proposal (for example when it helps to secure the optimum viable use of the heritage asset in the interests of its long term conservation) against the harm; and
  - ii. Recognise the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss.
- 6.8 Policy HE7.5 of PPS5 states that local planning authorities should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment and use.
- 6.9 It is contended that the application proposals are fully consistent with National Planning Policy objectives relating to Listed Buildings and the Conservation of Heritage Assets. The building is currently vacant, tired and in need of renovation and improvement. The only change to the principal facade of the building is that the existing shop front, which is not original, will be replaced. The existing timber sliding sash windows, also not original, are to be replaced with slim line double glazed conservation style timber sliding sash windows. To all intents and purposes there will be no discernible difference to the external appearance of the building.
- 6.10 The internal changes will involve a strip out of the existing building, none of which is original. The floors are constructed of plywood and the ceilings are plasterboard. The principal staircase which is constructed in metal will be replaced and re-handed. The external rear extension to No.18 with metal cladding will be demolished and replaced with matching brick elevations. While this elevation is not observable from the street scene it represents a

conservation benefit. The internal staircase to the rear of No.18 will be removed and the windows reinstated at the appropriate level. The opening in the party wall which formerly separated No.7 and No.18 is to be partially deconstructed to improve the living space within the proposed apartments. These changes are fully justified in the applicant's Heritage Statement. In overall terms the proposed changes have little impact on the historic fabric of the building. Internally there are some changes but these are necessary to facilitate the scheme, and will secure the long term future of this heritage asset.

#### *PPG13 – Transport*

- 6.11 PPG13 seeks to promote sustainable forms of transport, promote accessibility and reduce the need to travel. The document also promotes integration between different forms and modes of transport. The key objective of PPG13 is to ensure that jobs, shopping, leisure and services are accessible by sustainable modes of transport. It specifies that local authorities should give particular emphasis to accessibility in relation to development and potential development sites.
- 6.12 As previously referred to, the application site is in a highly sustainable location. The future occupiers of the building will have easy access to a range of facilities offered by one of the world's major capital cities.

#### *Draft National Planning Policy Framework*

- 6.13 The Draft National Planning Policy Framework was published for consultation in July 2011. It is intended to replace all extant National Planning Policy Statements and Guidance.
- 6.14 At the heart of the Draft National Planning Policy framework is a commitment to ensuring that the Planning System does everything it can to support sustainable economic growth. Paragraph 13 identifies that "Planning should operate to encourage growth and not act as an impediment". Paragraph 14 identifies that:

*"At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan and decision taking. Local Planning Authorities should plan positively for local development,*

*and approve all individual proposals whenever possible”.*

The Draft Framework specifically encourages, as proposed by this application, mixed use development which promotes multiple benefits from the use of land in urban areas. The Planning Inspectorate has advised all Inspectors to regard the Draft National Planning Policy Framework as a material consideration in the determination of Planning Appeals.

## **7. Local Planning Policy**

7.1 The relevant Development Plan for the area comprises The London Plan (July 2011), the adopted Camden Core Strategy 2010 – 2025 and Camden Development Policies 2010 – 2025. In addition Camden Council has adopted a suite of Supplementary Planning Documents to articulate local planning policy.

### *The London Plan (July 2011)*

7.2 The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the Capital until 2031. It forms part of the Development Plan for Camden and it replaced the Consolidated London Plan (February 2008) in July 2011. Policies of relevance to this application are identified as including:

- Policy 2.10 Central Activities Zone – Strategic Priorities
- Policy 2.11 Central Activities Zone – Strategic Functions
- Policy 3.3 Increasing House Supply
- Policy 3.5 Quality and Design of Housing Developments
- Policy 3.13 Affordable Housing Thresholds
- Policy 5.2 Minimising Carbon Dioxide Emissions

### *Camden Development Plan Policy*

7.3 The Development Plan at local level comprises the London Borough of Camden Adopted Core Strategy (2010) and Development Policy Document (2010) which sets out detailed policies that the Council applies relating to land use and determination of planning applications for the period 2010 – 2025. Policies relevant to this application are identified as

follows:

*Camden Core Strategy*

- CS3 – Other highly accessible areas
- CS6 – Providing quality homes
- CS8 – Promoting a successful and inclusive Camden economy
- CS9 – Achieving a successful Central London
- CS13 – Tackling climate change through higher environmental standards.

*Camden Development Policies 2010 – 2025*

- 7.4
- DP2 – Making full use of Camden’s capacity for housing
  - DP3 – Contributions to the supply of affordable housing
  - DP5 – Homes of different sizes
  - DP13 – Employment sites and premises
  - DP18 – Parking standards and limiting the availability of car parking
  - DP19 – Managing the impact of car parking
  - DP25 – Conserving Camden’s heritage

*Supplementary Policy*

- 7.5
- In addition to the Core Strategy and Development Policies there are also supplementary planning documents. Supplementary policy and guidance pertinent to the application includes:

- Conservation Area Statement – Seven Dials
- CPG3 -Sustainability
- CPG6 – Amenity
- Revised Planning Guidance for Central London- Food and Drink, Entertainment, Specialist Retail Uses

## 8. Policy Justification

8.1 The key planning considerations relating to the renovation and conversion of 7 Upper St Martins Lane are set out below.

### *Residential*

8.2 Policy at all levels supports increasing the supply of housing in Central London. The application site is located in the Central Activation Zone (CAZ) as defined by the London Plan. The London Plan Policy 2.10 sets out CAZ Strategic Priorities which include supporting “a rich mix of local as well as strategic uses within the defined CAZ area”. Policy 2.11 identifies that such uses should include housing. This application proposal clearly supports the mix of uses required in the CAZ.

8.3 There is a recognised housing shortage in London confirmed by paragraph 3.13 of the London Plan identifies that London “desperately needs more homes in order to promote opportunity and real choice for all Londoners”. In order to promote opportunity and choice, The London Plan sets annual average housing targets over the period 2011-2021 for Camden the minimum 10 year target is 6,650 new homes to be provided at an average of 665 units per annum. The application proposal will make a positive contribution to housing choice and housing supply re-using an existing building efficiently.

8.4 In addition to London’s quantitative housing requirement, it is recognised that housing should be of a high quality. This is supported by Policy 3.5 of the London Plan which identifies that housing development should be of the highest quality externally and internally and relate to the context of the wider environment. The proposed apartments will be completed to a high specification and aimed at the upper echelons of the housing market.

8.5 The location of the premises is ideal for residential development with a range of facilities and services within a short distance. Core Strategy Policy CS3 recognises the application premises are highly accessible and that amongst other uses residential development should be promoted.

- 8.6 There is further policy support for residential use in Central London locations provided by Core Strategy Policy CS6 – Providing Quality Homes. Policy CS 6 identifies that the Council aim to make full use of Camden’s capacity for housing by maximising the supply of additional housing to meet the plan target of 5,950 additional homes from 2007 – 2017 including 4,370 additional self contained homes.
- 8.7 Core Strategy Policy CS9 – Achieving a Successful Central London sets out the Council’s commitment to supporting and promoting the central London area of Camden as a successful and vibrant part of the capital to live in, work in and visit. It specifically identifies that this should include securing additional housing as part of appropriate mixed use developments.
- 8.8 Camden Council is committed to maximising the supply of additional homes in the Borough by resisting the alternative developments of sites that are particularly suitable for housing. This is outline in Policy DP2 of the Development Policy Document. The application premises are suitable for housing, assist in maximising supply and are therefore supported by Policy DP2.
- 8.9 Paragraph 2.8 of the Councils Development Policies Document states that housing is regarded as the priority land use of the LDF, and the Council will make housing its top priority when considering the future of unused and underused land and buildings. The application premises are currently vacant, and the application proposal is for a priority land use. Policy DP5 sets out the Council’s commitment to securing a range of self contained homes of different sizes. It identifies that for market housing the priorities for 2 bed dwellings is set at high and 3 bed dwellings is medium. The mix of dwelling sizes proposed therefore accords with the Council’s planned priorities for market housing.
- 8.10 CPG6 requires noise and vibration to be controlled and managed by any new development. The application submission is supported by an Acoustic Survey with appropriate recommendations for noise mitigation to provide a suitable internal living environment in accordance with policy standards set.
- 8.11 CPG 6 also provides guidelines on the Council’s expectations regarding adequate daylight and sunlight into all buildings. The proposed apartments have been designed to respond to

satisfy this policy requirement. All apartments have dual aspect. Principal habitable rooms benefit from an aspect on to the main street, the principal elevation. Each apartment receives a significant amount of daylight at all levels.

8.12 CPG6 also refers to outlook and privacy. There are no residential properties with overlooking windows within the enclosed courtyard to the rear of No 7 Upper St Martins Lane. The adjacent uses include St Martins Theatre and 2-6 West Street, Guild House which is occupied as an office. The issue of loss of amenity or overlooking from habitable room windows of the proposed apartments does not arise. The concept of loss of amenity does not apply to commercial premises. It follows that there can be no loss of amenity arising from the proposed roof terrace from the top floor apartment. It is confirmed that the roof terrace does not overlook the habitable rooms of the proposed apartments ( reference Drawing No. 171)

8.13 The overall conclusion with regard to residential policy for Camden is that there is a presumption in favour of residential development in Central London locations. As such the residential element of the scheme is wholly supported by policy.

#### *Employment*

8.14 The application premises, although currently vacant has an existing B1 use for floors one to four. The application will change the use of those floors to residential resulting in a loss of existing employment space. In this regard, Core Strategy Policy CS8 – Promoting a Successful and Inclusive Camden Economy seeks to safeguard employment sites and relates primarily to protecting industrial land supply of which there is a shortage in the Borough. It does not restrict the conversion of old office buildings to residential use in sustainable locations.

8.15 Camden's Development Policies Document Policy DP13 – Employment Premises and Sites is relevant to the applicant's proposal. It identifies that the Council will retain land and buildings that are suitable for continued business use and will resist a change of use to non-business unless it can be demonstrated that a site or building is no longer suitable for its existing business use, and that there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar alternative use has been fully explored over an

appropriate period of time.

- 8.16 The applicant has included in their submission a marketing analysis and assessment to justify the loss of office space at levels 1, 2 and 3 of the property. It identifies that over the period of time which the building was on the market there was no single occupancy interest for business use. The market evidence is that the building is not attractive to a single occupier on account of the separation of the business space over a number of floors. The evidence is that commercial tenants require an open plan floor layout on a single floor. Similarly market evidence demonstrates that the configuration of the building provides largely unusable space which is not conducive to achieving a satisfactory employment density at Central London office rates.
- 8.17 Alternative Class B1 use such as light industrial or research and development would not be suitable as the building is listed and close to existing residential properties. The applicant has demonstrated that the space at the application premises is unsuitable for business use, and that the retention of that building for that use does not provide any benefit and would be better served through its conversion. As a vacant building it is not making a contribution to the business economy. Furthermore, given the size of the building with just four floors dedicated to office space its loss is not significant.

### *Conservation*

- 8.18 The application proposal relates to a Listed Building located in a Conservation Area. In this setting conservation and heritage are important factors in determining this application.
- 8.19 Policy 7.8 of the London Plan relating to Heritage assets and archaeology identifies that development affecting heritage assets in their setting should conserve their significance by being sympathetic to their form, scale, materials and architectural detail. As described elsewhere in this statement the application proposal does not alter the form, scale or external material or finishes of the existing building and the internal alterations are not significant.
- 8.20 Policy CS14 of Camden's Core Strategy seeks to preserve and enhance Camden's rich and diverse heritage assets and their settings, including Conservation Area and Listed Buildings.

Changes to the rear of the building with the removal and replacement of modern elements represent a conservation benefit. The application proposal reuses a vacant Listed Building ensuring its long term future. The application will result in the preservation of one of the Borough's heritage assets of national importance.

- 8.21 Policy DP25 of Camden's Development Policy's Document advises that the Council will only grant consent for a change of use or alteration/extensions to a Listed Building where it considers this would not cause harm to the special interest of the building. The Policy states that development will only be permitted to Conservation Areas that preserve and enhance the character and appearance of the area. The applicant's proposals are supported by a Heritage Statement. This concludes that the proposals will enhance the Listed Building internally and externally and preserve and enhance the Conservation Area in line with the objectives of Camden's Core Strategy, Development Plan Policies and Conservation Area Statement – Seven Dials. The proposed investment will secure the long term future of a listed building in a Conservation Area which is tired and in need of investment.

*Affordable Housing and Open Space*

- 8.22 Policy 3.13 of the London Plan identifies that Boroughs should normally require affordable housing sites which has capacity to provide 10 or more dwellings.
- 8.23 Policy DP3 – Contributions to Provide Affordable Housing in Camden's Development Policies Document advises that the Council will expect all residential developments with a capacity for 10 or more additional dwellings to make contributions to supply affordable housing.
- 8.24 The application proposal makes very efficient use of the space in the building to create the four apartments proposed. The application premises do not have a capacity of 10 or more additional dwellings and therefore does not exceed the trigger within the Camden's Policy DP3 or Policy 3.13 of the London Plan which require any affordable housing provision to be provided on site. This was confirmed with the Planning Officer as part of the pre-application discussions.
- 8.25 With regard to open space, CPG6 identifies proposals for five or more dwellings will require

a contribution for open space provision. The application proposal is for four dwellings ( three additional dwellings) and as such there is no requirement for a planning obligation in relation to open space. This was confirmed by Officers at the pre-application discussions.

### *Sustainability*

- 8.26 PPS1 sets out the Governments overarching policies on the delivery of sustainable development. PPS22 sets out the Governments Policies for renewable energy. The London Plan identifies that development proposals in Policy 5.2 should make the fullest contribution to minimising carbon dioxide emissions leading to zero carbon residential buildings from 2016.
- 8.27 At the local level, Policy CS13 of the Core Strategy requires all development to take measures to minimise the effect of and adapt to climate change by promoting the efficient use of lands and buildings and generating renewable energy on site.
- 8.28 The scale of development proposed falls below the trigger set by CPG3 – Sustainability which requires that developments involving 5 or more dwellings must submit an Energy Statement. The proposals at 7 Upper St Martins Lane will incorporate sustainable design, construction and energy efficient measures wherever possible in line with National, Regional and local Planning Policy.

### *Transport*

- 8.29 The application site as previously referred to is in a highly sustainable location. Camden's Development Policies DP18 and DP19 – Managing the Impact of Parking and CS11 of the Core Strategy expects developments to be car free in the Central London area. The applicant will enter into a legal agreement to ensure that future occupants are not entitled to on street parking permits as required by Policy DP18.
- 8.30 Policy DP18 also states that developments will be required to meet the Council's minimum standards for cycle parking which is one storage space per unit. Cycle spaces (4 No.) will be provided in the basement of the building to meet this requirement. This is shown on the plans submitted in support of the application.

*Retail*

8.31 The lawful use of the premises is Class A1/A2. The applicant is seeking to extend the range of uses permitted at ground floor and basement level to include D1. The revised Planning Guidance for Central London adopted on 4<sup>th</sup> October 2007 identifies Protected Retail Frontages in the Covent Garden area. This is depicted on Map 4 which is included in Appendix 6 of this report. The application site is not designated as a protected retail frontage. The London Plan and Core Strategy encourage mixed use developments in the Central London area. Therefore there is no policy requirement to protect the potential Class A1 use at ground and lower ground floor level.

**9. Conclusion**

9.1 The application proposal is to convert and renovate 7 Upper St Martins Lane to extend the permitted uses at ground and lower ground level to include Classes A1 / A2 and D1 and to convert the upper floors of the building from office to residential use providing three 2 bed apartments and one 3 bed duplex at levels 4 and 5. The fifth floor of the building is already in residential use.

9.2 The proposals involve the strip out of the existing building with a replacement shop front, replacement fenestration, replacement staircase and new floors and ceilings. Discreet entrances providing access to the residential and commercial areas of the building are an integral element of the scheme proposals.

9.3 The building is currently vacant, tired and in need of investment. All internal fittings and structures date from the previous renovation of the building in the 1980s.

9.4 The principle of residential development in the location is supported by planning policy at the strategic and local level. There is a precedent for allowing the residential conversion at upper floors for buildings in the immediate location of the application premises. Furthermore the scheme will make a positive contribution to housing supply in Camden.

9.5 The application proposals will retain an active frontage with Class A1, A2 or D2 use. The

loss of office space at upper floor level is justified by a marketing analysis and assessment report. This building has been offered to the market based on current use. The applicant's market assessment report identifies an absence of interest from business occupiers of the premises. The configuration of space over a number of floors is not suited to modern business needs.

- 9.6 The investment to be made will secure the long term use of a Listed Building in a Conservation Area.
- 9.7 A number of sustainable design, construction and energy efficient measures will be incorporated into the proposals. The proposed conversion scheme is achieved in accordance the Council's requirements have regard to the amenity of future occupiers of the building.
- 9.8 Overall the proposals will result in a significant investment in the built environment of the Seven Dials Conservation Area which supports the objectives and aspirations of national planning policy, The London Plan and planning policy adopted by Camden Council.