

**Application for Planning Permission  
2 Tavistock Place, London WC1H 9RA**

**1 Introduction**

This is an application for an amendment to a planning permission granted on 11 December 2008 (reference 2007/6132/P), as previously amended (reference 2010/0543/P), in respect of 2 Tavistock Place, London WC2H 9LS. Permission is requested for a change of use from the current Class B1 use (Offices) to alternative uses as self-contained flats (Class C3) or short stay residential accommodation (Class C1).

**2 Significance of the architectural and historical character of the building**

The building that is the subject of the application is located on the south side of Tavistock Place. The whole of the building, including the front façade, was constructed in 1974-1975 and since then has been used as offices. The current use is Class B1.

**3 The proposed change of use**

Planning permission and listed building consent has been granted for a change of use from office to residential use (as nine self-contained flats) (2007/6132/P, 2008/0910/L, 2010/0543/P and 2010/0546/L). However, this change of use has not yet occurred.

The provision of accommodation for a period of less than 90 days falls outside Class C3. There is nevertheless a significant demand for accommodation of less than 90 days in the area, particularly from employees of international organisations on secondment to London and students attending courses of three months or less. The building is particularly suitable for this, due to its proximity to the City of London, good transport linked to Canary Wharf and elsewhere and the fact that a number of London University colleges are in the locality.

In order to capture this demand, it is proposed that accommodation will be made available for rental either for periods of 90 days or less or for longer periods. All accommodation would be on a self-catering basis, i.e. the only services to be supplied would be cleaning. The flats would have a high quality specification, targeting the upper end of the market. It is anticipated that the majority of residents would be in occupation for at least four weeks.

**4 Applicable policies**

Policy DP14 states that "the Council will support tourism development and visitor accommodation by ... expecting new, large-scale tourism development and accommodation to be located in Central London, particularly in the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn".

The Camden Core Strategy document (paragraph 8.28 and 8.29) also states that:

"Camden also has an exciting and wide variety of tourist and cultural attractions, from major institutions, such as the British Museum and British Library; to open spaces like Hampstead Heath and Primrose Hill; shopping destinations like Camden Town's markets and Covent Garden; music venues such as the Roundhouse, Camden Palace (Koko) and the Forum; Regent's Canal; and historic places, such as Hampstead and Bloomsbury. These attract 10 million visitors a year from throughout London, the UK and beyond and contribute greatly to the vibrancy, image and economy of Camden and London as a whole. The visitor economy contributes £566

million per annum and provides around 16,500 jobs in Camden, which is 10% of all tourism related employment in inner London. However, relatively few (1,500) of these jobs are filled by local residents (Study of the Visitor Economy in Camden 2009).

The Council recognises the importance of the visitor economy in Camden and will support the continued growth of the sector by implementing the Action Plan set out in the 2009 Study of Camden's Visitor Economy. The action plan recommends activities such as encouraging Camden residents into tourism related jobs, marketing campaigns to improve residents engagement and perception of the value of this economy and increasing the awareness of attractions in and around the borough through schemes such as 'Legible London', which aims to make it easier for pedestrians to find their way around Central London (see policy CS11)."

The proposal will be a small scale development, consisting of only nine units, some of which are expected to be occupied for more than 90 days. It will be located in Central London, in the centre of the growth areas identified.

The building is easily reachable by public transport, being approximately 200 metres from Russell Square Underground Station (which is on a direct line from Heathrow Airport), and very close to a number of central London bus routes. Visitors will be encouraged to use the Underground or buses to travel to and from the property. Given the small scale of the development, there is unlikely to be a material increase in the use of taxis and there will be no coaches. There is, however, an off-highway area immediately adjacent to the building, which can be used as a set down and pick up point if necessary.

Under policy DP 2, short stay accommodation should not lead to the loss of permanent residential accommodation. The proposal does not do this, as the current use is that of offices.

Policy DP 13 provides that the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:

- (a) it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use; and
- (b) 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.

The loss of office floor space was justified in the planning permission granted on 11 December 2008 (reference 2007/6132/P). The delegated officer's report stated:

"The policy results in the loss of 775m<sup>2</sup> of office (Class B1) floorspace and therefore requires assessment under policy E2 of the UDP. This policy states that planning permission will not be granted for development that involves the loss of business use on a site where there is potential for that use to continue. When a site is not suitable for continuation of other business use, other than B1a office use, the Council may allow an exception to this general approach where the change of use is to either permanent residential or community use.

In terms of retention, the existing office space is only likely to only be suitable for office purposes, rather than other industrial use designations, as it does not have features that would create flexibility for other business uses e.g. level access or off-

street loading. The property does not fall within the 50-120m<sup>2</sup> that is generally considered suitable for small businesses. The current supply of office space is thought to be plentiful, and there is no reason to suppose that the loss of this office space would put pressure on other land uses. Given the aforementioned policy considerations, the potential loss of this employment floorspace is not considered to conflict with UDP policy.”

Policy DP13 states 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 to permanent residential uses or community uses”.

However, it is submitted that this should not be interpreted as meaning that the only circumstances in which a change of use will be permitted is where the change is to permanent residential or community use. If that were the case, there would hardly be any circumstances in which it the availability of visitor and short stay accommodation in central London could be increased, since (excluding shop frontages and restaurants) virtually all the buildings in this area have either a business or a permanent residential use. Under DP2, a change from permanent residential use would not be permitted.

Such a restrictive interpretation would be inconsistent with policy DP14, which, as mentioned above, states that the Council “will support tourism development and visitor accommodation”, particularly in Central London. Paragraph 14.2 of the Camden Development Policies also states that:

“Camden has a wide variety of tourist attractions that experience high numbers of visitors throughout the year. Camden has the third largest number (almost 200) of hotels, B&Bs and hostels in London, after Kensington & Chelsea and Westminster (LDA Accommodation Census September 2008). Visitor numbers to London are expected to continue to increase, creating demand for more hotels and other overnight accommodation, particularly in Central London. The London Plan sets a target of achieving 40,000 net additional hotel bedrooms by 2026 across London. This policy aims to maintain and encourage a range of attractions and accommodation in the borough for Camden’s visitors.”

There is therefore a potential conflict between policies DP13 and DP14 and so a balance needs to be struck between them. As the delegated officer’s report has noted, the current supply of office space in the area is plentiful, while there is a shortage of short-stay accommodation. There is a particular shortage of accommodation for visitors who wish to stay for longer than a few nights (and for whom hotels are available) but less than 90 days. Hotels are not suitable for this category of visitor, on account of their cost, their lack of privacy and space and the fact that self-catering facilities are not provided. The demand for this type of accommodation is currently met largely from permanent residential accommodation being rented out on a short-term basis in breach of planning law.

The proposal seeks flexibility to make the accommodation available either on a short-stay basis or for a longer term. It will therefore contribute to an increase in both visitor accommodation and permanent residential accommodation, in line with demand. There would be no objection to a condition being imposed requiring the accommodation to be offered for a specified minimum period (of say 2 weeks).

## **5 Impact on the building and its setting**

The application does not involve any alterations to the building, either externally or internally, going beyond those in relation to which planning permission and listed building consent has already been granted.

The proposal would be beneficial to the Bloomsbury area, which is somewhat underrated in comparison to its central location. The marketing of the flats would promote Bloomsbury as a destination of interest. It would also focus on local attractions, such as the British Museum and the Charles Dickens house, local architectural interest and local history, such as the area's connection to members of the Bloomsbury group on the early 20<sup>th</sup> century. This would be helpful to local businesses and the reputation of Bloomsbury generally.