



61-65 Charlotte Street,
London, W1T 4PG

PLANNING STATEMENT

20 March 2015

Our Ref: Q50105

Contents

1.	INTRODUCTION	1
2.	DEVELOPMENT CONTEXT.....	3
3.	PROPOSED DEVELOPMENT	8
4.	PLANNING POLICY	10
5.	PLANNING ASSESSMENT	17
6.	PLANNING OBLIGATIONS.....	34
7.	CONCLUSIONS	38

Documents

- Document 1: Application Site Plan
- Document 2: Site Planning History
- Document 3: Appeal Decision Ref. (APP/X5210/A/13/2198656) dated 21st November 2013
- Document 4: Camden Council Pre-Application Response dated 29th October 2014

1 INTRODUCTION

1.1 This Planning statement is prepared on behalf of Merchant Land Investments Ltd in support of a planning application submitted to Camden Council for the proposed conversion and extension of Nos. 61, 63 and 65 Charlotte Street, London ('the site' hereafter).

1.2 The submission seeks permission for the following development:

“Erection of mansard roof extension at 4th floor level, redevelopment of rear of properties to provide rear extension at lower ground and ground floor level; shopfront alterations, in connection with the use of the properties for retail (ground floor), office (ground and lower ground floors) and residential use (6 extra residential units) at upper levels.”

1.3 The site comprises 3 buildings located within a terrace, all consisting of ground floor, basement and upper 3 stories. The occupancy of the building has been in gradual decline for some years. The entire office space is now vacant and the ground floor retail units at nos.63 and 65 Charlotte Street have been let on a short term basis to pop-up tenants to increase activity around the site and achieve a short-term sub-market rental income on the space.

1.4 The application is supported by a series of technical documents required to demonstrate the acceptability of the application proposals in light of development plan policy, and policy guidance. The additional supporting documents comprise:

- Application drawings, prepared by Harper Downie;
- Design & Access Statement, prepared by Harper Downie;
- Commercial Floorspace Assessment, prepared by Quod;
- Heritage Statement, prepared by Harper Downie;
- Daylight/Sunlight Report, prepared by ERS;
- Transport Assessment and Draft Travel Plan, prepared by TTP Consulting;
- Energy Statement, prepared by Metropolis Green;
- Sustainability Statement, prepared by Metropolis Green;
- Noise Report, prepared by Clement Acoustics;
- Draft Construction Management Plan, prepared by ML;

- Basement Impact Assessment, prepared by BW Murray; and
- Land Contamination Report, prepared by Castledine & Co.

- 1.5 This planning statement explains the development in the context of the adopted development plan, and supports the application forms, certificates and relevant drawings. Section 2 describes the development context, section 3 identifies the proposed changes, with section 4 providing a consideration to development plan policy. Section 5 provides a planning policy conformity assessment, with section 6 highlighting planning obligations applicable to the proposed development and section 7 providing conclusions to this statement.
- 1.6 The submitted proposals are in accordance with local development plan policy and the National Planning Policy Framework and will result in an acceptable form of development based around a high quality design solution undertaken by Harper Downie Architects.
- 1.7 The development is in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires development proposals to accord with the development plan. It is also in line with paragraph 14 of the National Planning Policy Framework (NPPF) which establishes a presumption in favour of sustainable development for planning applications which accord with the development plan. These should also be approved without delay.
- 1.8 During the pre-application period, the applicant submitted detailed material to inform discussion within a meeting on 15th October 2014, including a site visit held on 24th October 2014. A detailed pre-application response was received dated 29th October 2014, which has informed the application proposals, which is discussed at section 2.

2 DEVELOPMENT CONTEXT

a) Site and Surrounding Area

2.1 This section reviews the current characteristics of the site, and provides an overview of the surrounding area to provide a physical context to the application proposals. A plan illustrating the site boundary is provided at **Document 1**. Photographs of the site appear within the accompanying Design and Access statement.

b) Site Description

2.2 The proposal relates to 3 buildings located within a terrace on the south-western side of Charlotte Street between the junctions with Tottenham and Goodge Street. All consist of a ground floor, basement and three upper storeys. Historical uses of the site include operation as both a print works and sawmill under light industrial use in the 1960's before being converted into offices.

2.3 No.61 is a vacant office (Class B1(a)) on all floors and has an extensive basement which extends under Nos. 63 and 65. No. 63 operates as a temporary pop-up (Class A1) unit at ground floor level with vacant offices (Class B1(a)) above. No. 65 is also operating as a temporary pop-up (Class A1) unit at ground floor with 3 residential units (Class C3) on upper floors. Only one of these flats is included as part of this application (the flat at 3rd floor level), the other 2 flats (which have separate leaseholders) are not included in 'the site'.

2.4 The site is located within the Central Activities Zone and the Charlotte Street Conservation Area. All 3 of the buildings in the terrace are positive contributors to the Conservation Area. The existing frontage of the building is noted as having positive potential for enhancing the Charlotte Street Conservation Area, whilst buildings to the rear are more piecemeal and present a poorer element of the existing site.

c) Surrounding Area

2.5 Nearby urban context comprise similar terraced properties, along with a number of larger individual buildings in the near vicinity.

2.6 To the south-east of the site, the buildings (Nos. 59, 57, 55, 53 and 46) comprise 5, 4, 6, 4 and 5 storeys (respectively), all operating Class A retail uses at ground floor and residential/office uses above. Similarly to the north-west of the site 67 and 69 Charlotte Street, comprise a restaurant and a café at ground floor with residential above.

d) Relevant Planning History

2.7 A full review of the site's planning history is provided at **Document 2** of this report. However the most recent application is significant and should be highlighted relevant to the proposed development.

2.8 Application Ref. 2013/0014/P sought permission for the conversion of the application properties (Nos. 61, 63 and 65 Charlotte Street) to provide a mixed use scheme comprising café/retail at ground and basement levels, with residential units on the floors above. The description of development is provided below:

“Creation of retail unit for composite A1/A3 use (Sui Generis) at ground floor level of Nos 61 and 63 and basement level of Nos 61, 63 and 65 Charlotte Street; three residential units (2 x 2bed and 1 x 3bed) on the upper floors of Nos 61 and 63; new residential entrance at 61. External alterations including new shopfronts to Nos 61-65; flat roof to existing patio area, gangway platform and handrail, exhaust duct, and plant to rear.”

2.9 The application was refused at local level, and later dismissed at appeal in November 2013. Camden Council refused planning permission for the following two reasons:

- 1. “The proposed development would result in the loss of employment floorspace which remains suitable for use, it would fail to support economic activity in Camden particularly small and medium sized businesses and would result in the loss of employment opportunities within the Borough contrary to policy CS8 (Promoting a successful and inclusive economy) of the London Borough of Camden LDF Core Strategy and DP13 (Employment sites and premises) of the London Borough of Camden LDF Development Policies.”**
- 2. “The proposed creation of a large dining/restaurant facility, in excess of 100sqm, within this commercial frontage would result in an intensification of food and drink uses and would be detrimental to the character of the local area. The proposal would thereby conflict with Policies CS5 (Managing the impact of growth and development), CS7 (Promoting Camden's centres and shops), and CS9 (Achieving a Successful Central London) of the London**

Borough of Camden LDF Core Strategy and DP12 (Supporting strong centres and managing the impact of non retail town centre uses of the London Borough of Camden LDF Development Policies.”

- 2.10 The reasons for refusal are clearly split between that which concerned the loss of employment floorspace, and that which relates to the proposed restaurant/dining area proposed at ground and basement levels, which would be detrimental to the character of the area.
- 2.11 These reasons for refusal have been central to the consideration of the proposed development positive responses to both explained in section 4.
- 2.12 A copy of the inspector’s decision is included at **Document 3**.

e) Lawful Existing Use

2.13 The lawful use of the existing buildings are identified by floor below.

Floor	Property	Office Floorspace (B1a)	Retail Floorspace (A1)	Residential Floorspace (C3)
Lower Ground	61	338.0	-	-
	63	82.0	-	-
	65	66.0	-	-
Ground	61	196.0	-	-
	63	11.0	37.0	-
	65	-	43.0	-
	*RCC	-	-	13.9
First	61	61.3	-	-
	63	55.6	-	-
	65	-	-	50.6
	RCC	-	-	7.2
Second	61	63.5	-	-
	63	53.9	-	-
	65	-	-	40.6
	*RCC	-	-	7.4

Floor	Property	Office Floorspace (B1a)	Retail Floorspace (A1)	Residential Floorspace (C3)
Third	61	60.8	-	-
	63	51.5	-	-
	65	-	-	39.8
	*RCC	-	-	7.5
	Total	1039.60	80.00	131.00

*RCC- Residential Common Corridor

f) Pre-Application Discussions

2.14 The applicant met with London Borough of Camden officers on 15th October 2014, and on site on 24th October 2014 to review the emerging proposals for the site. This meeting reviewed a range of development control matters, including the principle of development, design, transport, heritage, energy and sustainability and the development context of the proposals; namely that the application is submitted to accommodate two SMEs which wish to locate in the borough, and deliver high quality residential accommodation to cross-fund significant investments in the configuration and fit-out of the office space.

2.15 A review of the relevant pre-application discussions relative to design is reviewed within the application design and access statement. The following matters were concluded relative to the proposals:

- A net uplift of usable office space would result from the proposals;
- Residential use accepted;
- Retention of retail units welcomed;
- Suggested revision to the unit mix to remove smaller units;
- The proposed roof profile was selected by officers (at a later date from the formal pre-application) and considered to be an acceptable design response;
- Removal of balcony to upper floors of no. 65 Charlotte Street to protect amenity;
- Basement excavations to level the existing basement to be supported by a basement impact study.



2.16 The pre-application discussions have informed the final scheme details as submitted. Positive responses are presented to each of the above issues within the application, representing a positive pre-application process to front-load planning issues ahead of submission, to enable a swift determination, cognisant of relevant material considerations; this is supported by policy guidance at all levels.

3 PROPOSED DEVELOPMENT

- 3.1 This section describes the proposed development and defines the principal components of the scheme. The application is accompanied by a comprehensive set of visual and illustrative material, prepared by Harper Downie Architects which illustrates the development proposal and explains rationale behind the design of the building.
- 3.2 The proposed development comprises a commercial-led mixed use development including ground floor and lower ground floor high quality office floorspace, 7 no. residential dwellings and the upgrade of existing retail units to reinvigorate the frontage of the building to Charlotte Street with enhanced elevation.
- 3.3 The proposals seek to convert and extend the existing building to accommodate proposed commercial accommodation to enable the relocation of our clients business and that of Holbud Limited, a recognised name in the international trading markets and employer of over 30 staff, to the borough. This involves investment in the existing office space at lower ground and ground floor to create flexible SME space comprising 835m² to accommodate the two identified occupants for the building highlighted above.
- 3.4 The proposed enabling residential development will involve the conversion of the upper floors of Nos. 63 and 65 and will seek to incorporate the following mix. I note that the site currently accommodates 3 existing residential units, two of which will remain in situ, and the third being redeveloped and extended; therefore the proposals constitute a net uplift of 6 residential units on the site.

Unit Size	Number of Units	Size of Units (m ² GIA)
Studio	2	43 – 48
1 bed	2	55
2 bed	1	81
3 bed	2	99 – 103
Total	7	-

- 3.5 In addition, internal and external improvement works to the two existing retail units at Nos. 63 and 65 to improve their condition and to maximise the occupational potential of the units without compromising the amenity of the proposed and existing residential units in the vicinity. It is the aspiration that retailers will develop their interests in the units, subject to the improvements being completed.
- 3.6 An extension at fourth floor level to provide additional residential floorspace (enabling family-size units) and upgrade of the existing poor frontage to Charlotte Street also forms part of the proposed development.

4 PLANNING POLICY

4.1 This section provides a commentary on the nature of the development in the context of development plan policy, policy guidance and other material considerations. An assessment of local development plan policy and specific local policy issues are dealt with in the relevant sections of Section 5 within the statement.

4.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that proposals shall be determined in accordance with the Development Plan unless material considerations indicate otherwise. The site is situated in Camden, and as such the development plan consists of the London Plan (2011), the Camden Core Strategy (2010), Camden Development Policies DPD (2010), and the Fitzrovia Area Action Plan (2014).

4.3 Camden is currently consulting on its Draft Local Plan. The Local Plan will replace the existing Core Strategy and Development Policies Document. The document is only in its 'draft' stage and the first stage of public consultation on the document closes in April 2015. Camden's aspirations are to release a revised draft for consultation late 2015 before an anticipated Public Examination early 2016.

4.4 The Development Plan should be read in the context of National Policy Guidance which is a material consideration.

a) Development Plan Allocations

4.5 The site is not allocated for any particular use within Camden Council's Core Strategy Proposal Map (2010), however it is subject to the following designations:

- Central Activities Zone;
- Charlotte Street Conservation Area; and
- Flood Zone 1 (low risk)

4.6 The site is also located within the London View Management Corridor (Parliament Hill Summit to the Place of Westminster) and covered by the Fitzrovia Area Action Plan (within Charlotte Street Character Area (4)).

- 4.7 The site has a PTAL rating of 6b (Excellent) and is located close to Goodge Street Underground Station.
- 4.8 The policies relevant to the current proposals are considered individually within the analysis part (Section 5) of this submission.

b) Development Plan

i. London Plan

- 4.9 The London Plan (adopted 2015) promotes sustainable forms of development, the concept of site intensification and the priority of bringing forward housing supply whilst respecting the local context are principles endorsed by this development proposal.
- 4.10 The London Plan retains a central focus on the delivery of minimum housing targets, with Policy 3.3 (increasing Housing Supply) requiring London Boroughs to seek to achieve and exceed the borough target; in Camden's case this is an annual target of 889 homes per annum. This annual target compares to the target of 665 homes per year in the previous version of the London Plan (2011). This increased figure places increased emphasis on housing delivery as a means to address London's worsening housing shortage.
- 4.11 The principles of ensuring high quality design and sustainable housing in London within mixed and balanced communities are promoted within the London Plan. Minimum unit sizes are promoted within policy 3.5 (Quality and Design of Housing Developments).
- 4.12 The London Plan also recognises the importance of the Central Activities Zone (CAZ) which covers London's geographic, economic and administrative core.

“It brings together the largest concentration of London's financial and globally-oriented business services. Almost a third of all London jobs are based there and, together with Canary Wharf, it has historically experienced the highest rate of growth in London.”

- 4.13 Strategic Priorities are promoted within Policy 2.10, strategic functions are set out in Policy 2.11 and Policy 2.12 highlights predominantly local activities within the Central Activities Zone.

“Policy 2.11 Central Activities Zone – Strategic Functions

The Mayor will, and boroughs and other relevant agencies should:

- a) Ensure that development proposals to increase office floorspace within CAZ and the north of the Isle of Dogs Opportunity Area include a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this plan (see Policies 3.4 and 4.3)**
- b) Seek solutions to constraints on office provision and other commercial development imposed by heritage designations without compromising local environmental quality, including through high quality design to complement these designations.”**

4.14 Supporting justification goes on to emphasize the importance of ensuring an adequate supply of office accommodation and other workspaces in the CAZ suitable to meet the needs of a growing and changing economy. Substantial employment growth in the CAZ driven by the expansion of the office based services sector will create significant demand for new office space.

ii. Camden Core Strategy

4.15 Camden’s Core Strategy was formally adopted in November 2010 and is the central element of the Local Development framework.

4.16 The Core Strategy sets out the key elements of Camden’s vision for the borough which have been considered within the application submission. This central document provides the strategic level document for the LDF that provides the vision and framework for subsequent development plan proposals.

4.17 In support of these objectives, the Core Strategy contains a series of topic-based policies that provide the baseline policy position for the determination of the planning applications in the borough. The Core Strategy contains key strategic policies for the borough, which are supplemented by other element of the Local Development Framework.

iii. Camden Development Policies Document

4.18 Camden’s Development Policies Document was adopted in November 2010 and sets out detailed planning criteria that Camden use to determine application for planning permission throughout the borough.

4.19 The policies in this document provide additional detail and guidance on how Camden will implement the approach set out in the Core Strategy through their decisions on applications for planning permission. Therefore, the two documents should be read in conjunction and cross referenced.

c) **Material Considerations**

i. **National Planning Policy Framework**

4.20 In March 2012 the government published the National Planning policy Framework (NPPF). The NPPF replaces previous national planning policy guidance. At paragraph 12 the NPPF states:

“National Planning Policy Framework (NPPF) does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up-to-date plan in place.”

4.21 The core principle underpinning the NPPF is the presumption in favour of sustainable development. As clearly stated in paragraph 14:

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking.

For decision-taking this means:

- **Approving development proposals that accord with the development plan without delay; and**
- **Where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless:**
 - a. **Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or**
 - b. **Specific policies in this Framework indicate development should be restricted.”**

4.22 This is a clear and fundamental principle that should be applied through decision-taking.

“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 choice of high quality homes.”**

4.23 At paragraph 17, the NPPF outlines 12 key principles that should be applied to both plan-making and decision-taking. Those relevant to the application proposals are considered below:

- “- **Not simply be about scrutiny, but instead 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 homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet 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;**
- **Taking 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, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings...;**
- **Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;**
- **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...”**

4.24 The central theme of the NPPF is the presumption in favour of sustainable development, and encourages local authorities to approve applications swiftly that are in accordance with the development plan.

4.25 As noted above, Camden is in the early stages of consulting on a Local Plan to ensure it has robust and up to date planning policies that reflect the NPPF.

ii. Fitzrovia Area Action Plan

4.26 The Fitzrovia Area Action Plan was adopted in March 2014 and prepared in response to continued significant pressure for development in the area. The document was designed to help shape the future of the area with policies based on following objectives:

Setting out a vision for the area shared by the Council, key community groups and key landowners;

Ensuring that growth takes place in a way that balances the need for residential, institutional and commercial uses and minimises harm to residential amenity;

Co-ordinating development proposals across a number of significant sites; and

Ensuring that growth delivers the maximum benefits to the area.

d) Supplementary Planning Documents and Guidance

i. Charlotte Street Conservation Area and Management Plan

4.27 The Conservation Area Appraisals and Management Plan (CSCAMP) was adopted in July 2008 and is recognised as being of considerable importance in providing a sound basis for guiding development within them. The purpose of the document is to provide a clear indication of the Council's approach to preservation and enhancement of the Conservation Area.

4.28 The plan defines the strategy for maintaining the special interest of the Charlotte Street Conservation Area. The plan outlines the approach that should be taken with regard to 'Control over new development'.

ii. Camden Planning Guidance

4.29 Camden Planning Guidance (CPG) provides advice and information on how they apply planning policies. The Camden Planning Guidance was prepared to support the policies in the Local

Development Framework (LDF). Guidance is therefore consistent with the Core Strategy and Development Policies that comprise the Local Development Framework (LDF). CPG guidance documents that are relevant to this proposal include:

- CPG 1: Design
- CPG 2: Housing
- CPG 3: Sustainability
- CPG 4: Basements and Lightwells
- CPG 5: Town Centres, Retail and Employment
- CPG 6: Amenity
- CPG 7: Transport
- CPG 8: Planning Obligations

e) **Conclusions**

4.30 Development plan policy and guidance is supportive of sustainable development, which is the 'golden thread' running through the NPPF. The re-use and intensification of buildings in sustainable locations is encouraged at all policy levels. The application site is not subject to a site specific allocation and thus is subject to the wider provisions of the development plan and material considerations relevant to the proposals.

5 PLANNING ASSESSMENT

5.1 This section provides an assessment of the application proposals in light of development plan and material considerations relevant to the scheme. It considers the main issues and planning considerations raised by the planning application proposals as follows:

- Land Use
 - Principal Use – Office Floorspace;
 - Principle of Use - New Residential Floorspace; and
 - Principal of Development – Retail Floorspace;
- Housing Mix
- Residential Design
- Conservation and Design
 - Retail/Office Frontage; and
 - Fourth Floor Extension
- Transport
- Amenity
 - Visual Privacy and Overlooking
 - Noise
 - Daylight/Sunlight
 - Odour
- Basement
- Sustainability
- Conclusions

5.2 Each is considered in turn below.

a) **Land Use**

i. **Principal Use - Office Floorspace**

5.3 Camden Core Strategy CS8 (Promoting a Successful and Inclusive Economy) stipulates that the council will support industries by:

“Safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers;”

5.4 Policy CS9 (Achieving a Successful Central London) seeks to support and promote the Central London area of Camden as a successful and vibrant part of the capital to live and work in by:

“Supporting Central London as a focus for Camden’s future growth in homes, offices, hotels, shops and other uses;”

5.5 Policy DP13 (Employment Premises and Sites) provides more detailed information on how the aims outlined in CS8 and CS9 will be implemented and states that the Council will resist a change to non-business use unless it can be demonstrated that the site or building is no longer suitable for its existing business use and that there is evidence that the possibility of retaining, re-using or redeveloping the site for similar or alternative business use is not viable. Importantly, there is scope within Policy DP13 to consider wider considerations in respect of business provision within development:

- Notably the level of employment floorspace;
- The delivery of residential accommodation in appropriate situations;
- The provision of new small or medium enterprise space; and
- Potential for conflict with nearby industrial use.

5.6 These are reviewed in turn below.

i. Level of employment floorspace

5.7 The building as is comprises 1,040sqm of existing vacant office space which is provided across the existing building as highlighted below:

Table 2: Existing Accommodation

Location	No. 61	No. 63	No. 65
Third Floor	61sqm	52sqm	0sqm – existing residential

Location	No. 61	No. 63	No. 65
Second Floor	64sqm	54sqm	0sqm – existing residential
First Floor	61sqm	56sqm	0sqm – existing residential
Ground Floor	196sqm*	11sqm (+37sqm A1 Retail)	0sqm (+43sqm A1 Retail)
Lower Ground Floor	338sqm*	82sqm*	66sqm*
Total	720sqm	255sqm	66sqm

5.8 It is relevant to note that the areas highlighted with an asterisk (682sqm) have recently been accepted by an inspector as offering no prospect for continued office use in its current configuration:

“Having viewed the basement are with its complex physical layout and poor provision of natural light I consider this to be sufficient demonstration that the area is not suitable for continued office use. Accordingly, its loss would not be harmful to economic activity in Camden. I concur with the Council’s Officers’ Report that in this instance marketing evidence is unnecessary. I conclude that the above considerations are sufficient to justify the loss of this existing floorspace.

The ground floor of No. 61 also suffers from poor natural light and to my mind offers an unsatisfactory standard of office accommodation.” (*Paragraphs 11 and 12, Appeal Decision Ref: APP/X5210/A/13/2198656*).

5.9 Without significant investment in these parts of the existing building, it was accepted by the Planning Inspector that the conversion of these elements of the site is acceptable in light of development plan policy. The effect of this would be the loss of 682sqm of existing office space in the borough.

5.10 Excluding the existing basement and ground floor office space there is currently 359 useable class B1 office floorspace in the buildings. The proposal is seeking to deliver high quality office accommodation to facilitate the relocation of two SME employers to the borough from their current accommodation at No. 66 Leman Street in the London Borough of Tower Hamlets. The proposed consolidation plans for the lower ground and ground floor will see a total office (Use Class B1a) provision of 835sqm(GIA).

5.11 It is fundamental to note therefore that the level of employment floorspace is technically reduced as a result of the proposals, but does not reflect the real-world situation. Over 50% of the existing

floorspace has been considered unsuitable for continued office use; meaning the proposals would deliver a net increase of 476sqm of useable high quality and flexible class B1 office floorspace on site with two identified occupants.

- 5.12 This in itself is compelling and is highly material in considering the overall office provision before and after the proposals. A useful axanometric illustration of the 'before and after' distribution of uses across the three buildings is provided within the Design and Access Statement.

ii. Delivery of Residential Accommodation

- 5.13 The conversion of the building, effectively re-distributing the office space from upper floors to the ground and lower ground, will enable the delivery of both high quality office space, but also much-needed residential accommodation in a range of unit sizes. This is therefore supported by DP13.

iii. Small, Medium Enterprise Space

- 5.14 SME space is defined as businesses employing less than 50 people (small) and or less than 250 people (medium) as defined by the European Commission Recommendation 2003/361/EC. The relocation of Holbud Investments Limited and Merchant Land Investments Limited to the proposed space will enable the accommodation of two identified existing businesses, and enable the growth of these businesses to provide a maximum employee capacity of circa 50 people. This is therefore supported by Policy DP13.

- 5.15 The design of the roof incorporates clear storey windows and rooflights meaning the space will be flooded with natural light to support a high quality, healthy working environment. Additionally light-wells to the intermediate floor will allow natural light into the lower ground floor to avoid dark undesirable spaces at this level. The interior of the spaces will be spacious, contemporary and light, suitable to support modern office use.

iv. Conflict with Nearby Industrial Use

- 5.16 There are no nearby industrial uses to be aware of, or consider in respect of the proposed development. This is therefore in accordance with policy DP13.

5.17 In addition to DP13, CPG5 (Town Centres, Retail and Employment) is also of relevance. This guidance explains those circumstances where the Council will consider alternative uses for an employment site. It states changes from office use to an alternative use may be acceptable in respect of older office premises and that in these circumstances the priority replacement use would be permanent housing or community uses. The proposals are therefore in direct compliance with this guidance.

5.18 The FAAP (2014) notes the following relative to the provision of SMEs within the area:

“Principle 4

The Council will support small and medium enterprises (SMEs) by seeking to ensure that where appropriate:

**Existing business premises suitable for SME use are retained;
New business development is designed flexibly to allow parts of the property to be occupied SMEs.”**

5.19 The proposed office accommodation will be designed to a flexible brief, which will enable future subdivision and potential serviced office models to be adopted for the accommodation. A key element of this is the proposed office reception at ground floor level of No. 61 Charlotte Street, which will allow for serviced office business models to be used on site. It is necessary to note, however, that there are two identified long-term tenants identified for the proposed space, which will see the building retained in office use for the foreseeable future.

5.20 The proposed office floorspace is therefore in direct accordance with development plan policy, and national planning policy guidance directed at the delivery of sustainable business accommodation.

b) Principle of Use – New Residential Floorspace

5.21 Core Strategy Policy CS6 (Providing Quality Homes) reflects the housing delivery targets established by a previous version of the London Plan (2008), and thus is out of step with the housing delivery target. However as highlighted in Section 4 the London Plan (March 2015) establishes a target of 8,892 new homes to be delivered in Camden over the plan period (2015-2025), equating to an annual housing target of 889 homes per annum.

- 5.22 Additionally emerging Local Plan Policy H1 (Maximising Housing Supply) intends to include even higher figures with a target of 16,100 additional homes over the plan period (2016-2031), equating to an annual housing target of 1,073 homes per annum.
- 5.23 Notwithstanding this, these targets are intended to operate as a minimum that can be exceeded. Policy CS6 seeks to maximise the delivery of housing within the borough, and is therefore supportive in the context of the aspiration to deliver further housing at the site.
- 5.24 Policy DP2 (Making Full Use of Camden’s Capacity for Housing) reflects Policy CS6 objective to maximise the supply of housing in the borough by:

“expecting the maximum appropriate contribution to the supply of housing on sites that are underused or vacant, taking into account any other uses that are needed on site;”

- 5.25 In addition Principle 1 (Housing and Affordable Housing) of the FAAP supports the provision of extra residential units stating that the Council will promote the development in Fitzrovia of permanent self-contained housing (in Use Class C3) unless there are strong economic reasons why such development would be inappropriate.
- 5.26 Subject to satisfying the wider provisions of the development plan policies, noticeably those relative to office space discussed above, residential use ought to be acceptable in this location.

c) Principle of Development – Retail Floorspace

- 5.27 Core Strategy CS7 seeks to direct new retail floorspace to the borough’s centres and parade, with only a limited provision of small shops outside of these locations being acceptable to meet local needs. This strategic policy is supplemented by Development Policy DP12 (Supporting Strong Centres and Managing the Impact of Food, Drink, Entertainment and other Town Centre Uses), which seeks to protect the character, function, vitality and viability of the borough’s centres; the policy takes account of the following elements:

- “a) The effect of non-retail development on shopping provision and the character of the centre in which it is located;**
- b) 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;**

- c) **The impact of the development on nearby residential uses and amenity, and any prejudice to future residential development;**
- d) **Parking, stopping and servicing and the effect of the development on ease of movement on the footpath;**
- e) **Noise and vibration generated either inside or outside of the site;**
- f) **Fumes likely to be generated and the potential for effective and unobtrusive ventilation;**
- g) **The potential for crime and anti-social behaviour, including littering.”**

5.28 Furthermore, detailed policy guidance is provided in Policy DP10 (Helping Promoting Small and Independent Shops), which is re-provided below.

“The Council will encourage the provision of small shop premises suitable for small and independent businesses by:

- a) **Expecting large retail developments to include a proportion of smaller units;**
- b) **Attaching conditions to planning permissions for retail developments to remove their ability to combine units into larger premises, where appropriate;**
- c) **Encouraging the occupation of shops by independent businesses and the provision of affordable premises.”**

5.29 In the case of the previous appeal scheme (APP/X5210/A/13/2198656), the council considered that such a scale of retail provision (693m2 GIA) would harm the character of the area.

5.30 The FAAP (2014) notes:

“Camden's Planning Guidance for Central London identifies two other types of shopping provision that are characteristic of Fitzrovia. Specialist shops such as art dealers and bookshops can be found throughout the Plan area, but are focussed particularly on Percy Street, Warren Street and Windmill Street (as well as in the neighbourhood centres). In the southern part of Charlotte Street there is a concentration of food and drink uses aimed at West End visitors and the Central London workforce, although food and drink uses are present throughout Fitzrovia (including particularly Cleveland Street Neighbourhood Centre)”

5.31 This informs Principle 5 of the FAAP, which states:

“Principle 5

The Council will guide development of large A1 shops to the Central London Frontage on Tottenham Court Road and New Oxford Street.

The Council will seek to support independent and specialist shops as an element of Fitzrovia's character and function, and will resist the loss of A1 shops and floorspace that would harm the area's mixed-use character and vitality.

The Council will guide development of food, drink and entertainment uses to the Central London Frontage on Tottenham Court Road and New Oxford Street, except those the Council considers to be small scale and low impact.”

5.32 CPG5 (Town Centres, Retail and Employment) provides further detail on small shops and provides detailed guidance on our approach to securing small, affordable and independent shops in appropriate locations.

5.33 Previous proposals for the site proposed a significant food and drink establishment, which was not well received and would be to the detriment of the character of the Charlotte Street area. The nature of the proposed retail remains consistent with the aspirations and existing character of Charlotte Street and the surrounding area, i.e. the provision of small retail units suitable for independent retailers, which is in accordance with Policy DP10.

5.34 The retention and upgrade of the existing units is in accordance with development plan policy, and will ensure that the parade will benefit from bringing these frontages back into active use.

d) Housing Mix

5.35 Policy CS6 (Providing Quality Homes) seeks to secure mixed and inclusive communities and a range of self-contained homes of different sizes. Policy DP5 provides guidance on implementation of Policy CS6 by providing more detail on Camden's approach to providing homes of different sizes. Camden will:

“a) Seek to ensure that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table, including conversion of existing residential and non-residential floorspace;

b) Expect a mix of large and small homes in all residential developments.”

5.36 The guidance goes on to state that when considering the housing mix of a development it will have regard to different dwelling size priorities and will take into account:

- “c) The character of the development, the site and the area, including the impact of the mix on child density;**
- d) Site size, and any constraints on including homes of different sizes; and**
- e) The economics and financial viability of the site, including the demand for homes of different sizes”.**

5.37 The supporting justification of the policy provides a ‘Dwelling Size Priorities Table’ identifying different dwelling size priorities for social rented housing, intermediate affordable housing and market housing. Under the proposals there would be an uplift of 6 flats to provide 7 flats on the site (plus 2 flats not included in the proposals).

5.38 It is important to note that this development would provide 1 X two-bedroom duplex of which there is a ‘very high’ need and 2 x three-bedroom duplex flats of which there is a ‘moderate’ need providing valuable large family homes for Camden as identified by supporting justification (paragraph 5.4).

5.39 Further to this the emerging Local Plan includes a revised version of the ‘Dwelling Size Priorities Table’ under Policy H7 (Large and Small Homes) which places emphasis on providing a mix of self-contained dwellings. The revised table indicates intentions to prioritise three-bedroom (high need) over two-bed (medium need) which are based on more up to date draft outputs taken from the new assessment of housing needs commissioned by Camden Council. The development would therefore provide 2 x three bed large homes of which there is a high need as well as a mix of other valuable dwellings in line with this emerging policy.

e) Residential Design

5.40 CPG2 (Housing) provides guidance on residential development standards and general guidance (4.12) on minimum floor areas for different flat sizes. In addition, homes of all tenures should meet lifetime homes standards in accordance and 10% of the homes should either meet wheelchair housing standard or be easily adaptable to meet the standards.

5.41 The overall internal floorspace in new self-contained dwellings should meet or exceed standards GPG2 which is highlighted below. Additionally the council will expect bedrooms to meet or exceed 11.0sqm (first and double bedrooms) and 6.5sqm (single bedrooms).

Dwelling Type (bedroom/persons)	1 Bed (studio)	1 Bed	2 Bed	3 Bed
Camden Minimum Floorspace(sqm)	32	48	61	75
London Housing SPG (Annex 1) (sqm)	37	50	61-70	74-95
Proposed (sqm)	43-48	55	81	99-103

5.42 All of the proposed residential units meet or comfortably exceed all the internal space standards including ceiling height, room size and utility space standards. As detailed within the Design and Access Statement a platform lift has been included to ensure that 10% of the homes will be adaptable to meet wheelchair housing standards, and all units will meet Lifetime Home Standards.

5.43 All of the proposed flats would be dual aspect, with outlook over Charlotte Street to the front and rear. Additionally balconies are proposed for six of the seven new flats at the rear in accordance with the London Plan. It should be noted the omitted balcony is a result of pre-application discussions with Camden Council in line with Policy DP26 (Managing the Impact of development on occupiers and neighbours) to avoid overlooking of an existing roof terrace at No. 67 and considered acceptable.

5.44 The proposed residential accommodation is therefore in direct accordance with the development plan policy, and National Planning Policy Guidance directed at residential design standards.

f) Conservation and Design

5.45 Policy CS14 (Promoting High Quality Places and Conserving our Heritage) seeks to ensure development of the highest standard of design that respects local context and character.

5.46 Policy DP24 (Securing High Quality Design) provides further detail and requires all development to be of the highest standard of design and DP25 (Conserving Camden’s Heritage) states that proposals

within Conservation Areas should preserve and enhance the character and appearance of the conservation area.

5.47 The site is located within the Charlotte Street Conservation Area and the buildings are recognised as positive contributors to the conservation area. The proposed external alterations include the re-design of retail frontages at Nos. 63 and 65 and a mansard roof extension at fourth floor level to provide additional residential floorspace.

i. Retail/Office Frontage

5.48 The re-design of the retail frontage looks to re-develop the frontage of Nos. 61-65 in order to create high quality frontages reverting to the original detailing and materials, in-keeping with the existing Georgian character of Charlotte Street and thus making a positive contribution to the conservation area. Further to this the existing residential entrance at No.63 is proposed to be removed as part of the residential redevelopment to the upper floors, re-instating a generous retail frontage and positive hierarchy to the street-scape.

5.49 The redevelopment of these facades will aim to promote an active frontage to this stretch of Charlotte Street, which does not exist at present, creating retail units and a front of house office reception which will encourage footfall and reinstate the character and life back into this area in line with development plan policy.

ii. Fourth Floor Extension

5.50 The proposed mansard roof extension (Nos. 61 and 65) is designed to be subordinate to the existing building. Partially set back from the parapet and sloping back to become discreet and subsidiary from street level and to maintain the legibility of the scale of the existing building in the street-scape. Parapet walls follow the party wall line of each terrace to maintain the existing grain and separation of the terrace.

5.51 As part of the roof extension it is proposed the existing parapet at No. 63 is raised and maintained in its current form, to form an additional storey. This was presented as an option at pre-application stage to the conservation officer and was identified as the most suitable treatment. This serves to maintain the character of the street and existing grain and separation of each terrace.

- 5.52 Charlotte Street is characterised by its sculptural roof-line and a lack of uniformity providing a clear definition to each building and a rhythm to the street-scape. The proposed roof extension has been designed to retain these characteristics through materiality, detailing and form.
- 5.53 61-65 Charlotte Street consists of four storeys which is the most consistent and lowest roof-line of the street with surrounding buildings ranging from five to six and up to ten storeys. The proposed roof extension sits well in its scale and context, below the adjacent No.59 party wall height and amongst other taller buildings along the terrace.
- 5.54 The proposed development will enable the provision of high quality larger format family accommodation within the scheme of which there is an identified need (Dwelling Size Priorities Table Policy DP5). Additionally it will facilitate the retention and improvement of a heritage asset to enhance the role that the site plays in the conservation area, and the setting of nearby listed buildings in line with development plan policy.

g) Transport

- 5.55 Policy DP18 (Parking Standards and Limiting the Availability of Car Parking) seeks to ensure that developments provide the minimum necessary car parking provision and states that Camden will expect development to be car free in the Central London Area. Developments will also be expected to meet the Council's minimum standards for cycle parking.
- 5.56 Policy DP17 (Walking, Cycling and Public Transport) states developments should make suitable provision for pedestrians, cyclists and public transport and resist development that would be dependent on travel by private motor vehicles.
- 5.57 Policy DP16 (The Transport Implications of Development) seeks to ensure that development is properly integrated with the transport network and is supported by suitable alternative transport methods. Additionally CPG7 (Transport) provides further detailed guidance to support development plan policies.
- 5.58 The site is located within an area benefiting from a Public Transport Accessibility Level (PTAL) of 6b, the highest level of accessibility to public transport in the city. This is calculated on a series of indices, but notably rates locations on their proximity to public transport nodes. Given the site's rating of 6b the application proposals do not seek to provide car parking on the basis that the need for private

car use in this location is limited. The existing site currently has no off-street parking provision. There is no physical vehicular access to the site and this would not be provided as part of the scheme due to the harm it would create to the building and the character and appearance of the conservation area.

- 5.59 On-street cycle parking facilities are provided in the vicinity of the site for the replacement retail and office land uses. Residents of the development will have the option of storing a bicycle within each of the residential units.

h) Amenity

- 5.60 Camden CPG6 (Amenity) seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. Policy DP26 (Managing the Impact of Development on Occupiers and Neighbours) states that outdoor space for private or communal amenity space will be required, wherever practical.

- 5.61 This requirement is supported within the Mayor's Housing Supplementary Planning Guidance (November 2012), which stipulates at requirement 4.10.1 (Private Open Space):

“A minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant.”

- 5.62 The introduction of 6 balconies (utilizing materials sensitive to the conservation area and surroundings) on the rear elevation, at 1st, 2nd and 3rd floor levels is in accordance with London Plan guidelines and the above development plan policy.

- 5.63 Camden CPG6 provides further detailed guidance on all amenity issues within the borough. Additionally Policy DP26 includes a number of factors regarding development impact that are to be considered relevant to the proposals including:

- “ a) Visual privacy and overlooking;**
- b) Overshadowing and outlook;**
- c) Sunlight, daylight and artificial light levels;**
- d) Noise and vibration levels;**
- e) Odour, fumes and dust;**

- f) Microclimate;**
- g) The inclusion of appropriate attenuation measures.”**

i. Visual Privacy and Overlooking

5.64 It is not considered that the introduction of the aforementioned balconies would impact in terms of overlooking of the rear of any residential properties.

5.65 It is important to note that a balcony has been removed from the proposals as a result of pre-application discussions with Camden. The balcony at the 2 bed duplex flat at number 65 Charlotte Street has been omitted to avoid overlooking an existing roof terrace at No. 67 Charlotte Street and is considered acceptable in line with Policy DP26 and CPG6.

ii. Noise

5.66 An environmental noise survey has been undertaken in order to measure ambient noise levels in the area. Measured noise levels have allowed an assessment of the level of exposure to noise of the proposed development site to be made.

5.67 Outline mitigation measures, including a glazing specification and the use of appropriate ventilation have been recommended and would be sufficient to achieve good internal noise levels for the proposed development according to BS8233:2014 and in line with development plan policy.

iii. Daylight/Sunlight

5.68 A detailed daylight and sunlight analysis has been used to evaluate the potential changes to light amenity to the neighbouring properties. This involved the analysis of the property at 12 Goodge Place that are in closest proximity to the proposed Charlotte Street extension.

5.69 Overall, the impact of the proposed scheme is considered to have a negligible impact on the neighbouring amenities of 12 Goodge Place. Both the Average Daylight Factor and the light distribution showed no reduction in the proposed model in comparison to the existing.

5.70 The impact of the proposed scheme on daylight and sunlight received by 12 Goodge Place is within the guidelines contained in BRE Report 'Site layout for daylight and sunlight; a guide to good practise' for both daylight and sunlight.

iv. Odour

- 5.71 Impact on neighbours resulting from odour and fumes would be substantially reduced in comparison to the previous proposal (dismissed at appeal) which included a larger format A3 unit and was not well received. Additionally Nos. 63 and 65 Charlotte Street previously operated as both a café and a restaurant resulting in odour nuisance from cooking.
- 5.72 The proposals seek to reinstate established small retail units removing any issue of odour nuisance improving amenity for surrounding neighbours in line with Camden Policy DP26 and CPG6.

i) Basement

- 5.73 Policy DP27 (Basements and Lightwells) states that developers will be required to demonstrate with methodologies appropriate to the site that schemes maintain the structural stability of the building and neighbouring properties.
- 5.74 Given the excavation proposed at the rear of 63 and 65 Charlotte Street an appropriated scaled Basement Impact Assessment was carried out to assess any potential impacts from the scheme.
- 5.75 The result of said assessment, highlighted that the proposals are unlikely to have any detrimental impact on the land or slope stability, the hydrogeology and hydrology of the site nor the adjacent and adjoining structures.

j) Sustainability

- 5.76 Policy DP22 (Promoting Sustainable Design and Construction) requires development to incorporate sustainable design and construction measures. Developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. CPG3 (Sustainability) states that all buildings which are updated or refurbished should reduce the carbon emission of the building by making improvements to the existing building.
- 5.77 Additionally Principle 10 of the Fitzrovia Area Action Plan states that the Council will expect all development in Fitzrovia to incorporate appropriate measures to make the area more sustainable and tackle climate change, and will promote local energy generation and networks in the area.

- 5.78 A Sustainability Statement was produced for proposed development at 61-65 Charlotte Street. It demonstrates that the proposed development at 61-65 Charlotte Street in the London Borough of Camden can achieve the required rating of 'Very Good' under the BREEAM BDR and NDR schemes, implementing sustainability measures where appropriate and practical.
- 5.79 The sustainability strategy focuses on the implementation of sustainable systems for energy, water, waste management, pollution, and construction management. Much attention has been given to reducing the environmental impact throughout the lifetime of the building, during construction, refurbishment and occupation of the dwelling. Sustainability measures are proposed which go beyond the works necessary for the development.
- 5.80 The BREEAM Pre-Assessments attached as appendices to the Sustainability Statement demonstrate that a rating of 'Very Good' can be achieved for the proposed development for both the proposed dwellings and NDR office areas, despite existing constraints.
- 5.81 It is considered that the proposal would substantially improve the sustainability of the current building in compliance with policies DP22, the guidance contained within CPG3 and principle 10 of the Fitzrovia Area Action Plan.

k) Conclusions

- 5.82 The principle of development is justified in the context of development plan policies. This demonstrates that the upper floors of the building are appropriate for conversion to residential accommodation. The principle of development at ground and basement floors is also acceptable.
- 5.83 The replacement commercial floorspace at ground and lower ground level will enhance the current offer by delivering modern, well designed, flexible and high quality office space that will enable two identified SME employers to relocate to the borough.
- 5.84 The retention and upgrade of the existing retail units is in line with the aspirations of the existing character area of Charlotte Street and will ensure that both the immediate parade and wider area will benefit from bringing these frontages back into active use.

- 5.85 The proposed residential accommodation is provided to satisfy and exceed space standards as stipulated at Mayoral and borough levels as well as providing valuable two and three bed units to contribute to increasing Camden Housing targets.
- 5.86 The proposal will deliver a significant improvement to this prominent location, replacing a tired and empty building with a poor internal layout, with a high quality building of excellent design quality which has been refined in discussion with Camden Officers. The palette of materials, general design, layout and bulk and massing represent a strong response to the sites context.

6 PLANNING OBLIGATIONS

6.1 This section considers that relevant viability has always been considered an important component of the consideration of planning applications, but has only ever been given policy recognition through the formation of affordable housing policies. Negotiations for example should account for individual circumstances including development viability (London Plan Policy 3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes).

6.2 However with the adoption of the NPPF, a material consideration which carries significant weight, the consideration of viability of development as a whole is now a clear objective of the Government.

6.3 One of the twelve core principles which “underpins” decision making is set out at paragraph 17 and states:

“i. Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. 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. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;”

6.4 It notes that plans should “take account of market signals, such as land prices and housing affordability”.

6.5 This consideration is taken further at paragraph 173 which states that:

“i. Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such as scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to a development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”

6.6 Paragraph 173 therefore establishes a clear and coherent framework of development viability that any application should be tested against.

a) **Community infrastructure Levy (CIL)**

6.7 This planning application will be subject to the Mayor of London's Crossrail CIL at £50 per sqm of new floorspace (net uplift) given that more than 100sqm increase in floorspace is proposed (April 2013). Immediately therefore there is a significant financial liability against development.

6.8 The final CIL calculation is based upon the following assumptions:

- Proposed GIAm²
- Less proposed affordable GIAm²
- Less existing floorspace (in lawful use to be demolished) GIAm²
- GIA x £50/m² (all floorspace)

6.9 Further to Mayoral CIL the introduction of the Camden CIL will be considered by the Camden Cabinet on 25th February 2015 and the Full Council on 2nd March 2015 and it is planned to introduce a Community Infrastructure Levy on 1st April 2015. The CIL will be collected alongside section 106 agreements which will be scaled back to site specific requirements.

6.10 The Camden CIL Draft Charging Schedule (February 2015) lists varying charges dependant on which Zone they are within on Camden's CIL Map. The development site is within "Zone A" Central meaning it would be liable for the following CIL tariffs (per sqm) subject to adoption:

- Residential below 10 dwellings - £500
- Office - £45
- Retail - £25

6.11 Based on the adopted Mayoral CIL and the emerging Camden CIL charges set out above, the CIL charge liable for the application proposals (non-indexed) amounts to **£359,926**, based on total existing floorspace within no. 65 Charlotte Street being deductible from the overall calculation by virtue of meeting the CIL occupancy tests.

b) Section 106 Contributions

6.12 The Camden Core Strategy Policy CS19 (Delivering and Monitoring the Core Strategy) states the Council will use planning obligations and other suitable mechanisms where appropriate in order to deliver the vision, objectives and policies of the Core Strategy as highlighted below:

“We will:

b) Use planning obligations, and other suitable mechanisms, where appropriate, to:

- **Support sustainable development**
- **Secure and necessary and related infrastructure, facilities and services to meet needs generated by development.”**

6.13 Camden revised Section 106 guidance (February 2015) provides further detailed guidance on planning obligations that are normally secured under Section 106 (S106) of the Town and Country Planning Act 1990. Camden CIL is intended to be adopted as of April 2015 and operate alongside the Section 106 system.

6.14 Regulation 123 of the CIL Regulations indicates that in the future planning obligations cannot be sought to secure infrastructure projects or types of infrastructure that will be wholly or partly funded by the CIL.

6.15 The provision of affordable housing currently lies outside of the remit of CIL and will continue to be secured through planning obligations. Planning obligations will also continue to be used for local infrastructure requirements directly related to development sites, such as provision of open space and landscaping on or in the immediate vicinity of a site, habitat protection, and highways works to make development acceptable in planning terms.

6.16 The principle is that all eligible developments must pay towards CIL as well as – by way of a s106 Agreement - contributing to the costs of any site specific requirements that are necessary to make the development acceptable in planning terms, while adhering to the provisions of Regulations 122 and 123 of the CIL Regulations.

6.17 From a review of the revised Section 106 guidance (2015) the following financial contributions may be applicable.

i. Sustainability

6.18 Developments are expected to connect to a decentralised energy network unless it can be demonstrated that it is not technically feasible or financially viable. Developers should use guidance in CPG3 – Sustainability chapter 5, to determine whether connection to a decentralised energy network, a combined heat and power plant or a contribution towards a decentralised energy network will be expected. Where clearly related to the development of a site s106 agreements will be used to secure a financial contribution towards future decentralised energy networks in the immediate vicinity of the site.

ii. Employment and Business Support

6.19 The Council may require developers to assist with training and employment initiatives via section 106 Agreements where the development impacts on the availability of jobs for Camden residents, including the following types of development:

“Any commercial land use where the proposed development could offer local employment opportunities, or would have the potential to provide it on account of its floorspace (i.e. greater than 1000 square metres or 50 jobs).”

6.20 A financial contribution to assist local residents to receive training in the skills that would enable them to access the jobs created by the new development may be sought. These monies will be held by the Council and used in suitable partnership projects with recognised training and employment organisations and partnerships.

6.21 Developers may need to provide a financial contribution to support the employment and training elements of local regeneration initiatives or partnerships. This could extend to funding or providing construction training opportunities for local residents related to a development, either through recognised local initiatives or partnerships (e.g. Kings Cross Construction Skills Centre), or through in-house training schemes operated by their contractors and agreed with the Council’s Economic Development Team.

6.22 Contributions to employment and business support will be primarily funded through section 106 where legally justified rather than CIL because they do not constitute infrastructure as defined by the CIL regulations and also will not be subject to pooling restrictions.

7 CONCLUSIONS

7.1 This planning statement has sought to address a variety of planning issues which arise as a result of the redevelopment of 61 – 65 Charlotte Street. The Planning Statement is one of a suite of supporting documents which justify the proposed development, all of which should be read holistically.

7.2 To conclude the planning application should be granted planning permission for the following reasons:-

- Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be undertaken in accordance with the development plan unless material considerations indicate otherwise. This proposal is in accordance with development plan policy, and in addition, there are material considerations which would support the grant of planning permission.
- The adopted NPPF (2012) promotes a presumption in favour of development. It confirms that planning applications undertaken in accordance with the development plan should be approved “without delay”. As this submission is made in accordance with the development plan we consider that a decision should be made “without delay”.
- The adopted NPPF states that where the development plan is silent or absent on a particular matter, then planning permission should be granted unless “any adverse effect of doing so would significantly and demonstrably outweigh the benefits” of the development. There are no “significant and demonstrable adverse effects” of this development that exists in the first instance. Secondly, even if there were, then they would not outweigh the “benefits” of the proposal.
- The submitted Commercial Floorspace Assessment demonstrates that the existing building as a whole is not fit for current market demand, and a series of investments are required in order to bring this space into viable use. Furthermore, the majority of the existing space is poorly configured and suffers from inherent restrictions, which cannot be overcome with piecemeal investment. A holistic approach is therefore required to bring the building back into use.
- Specific to upper floors of nos 61 and 63, the commercial floorspace assessment demonstrates that the space is poor, ill-equipped and not suited to the market, with other more suitable space

being readily available in the vicinity to meet such demand for split floor accommodation. It is therefore demonstrated that the upper floors are appropriate for release to residential use.

- The conversion of the ground and lower ground floors to provide commercial floorspace, which will contribute to the wider aims of ensuring that the ground and lower ground floor are brought back into viable employment generating use, should be supported all levels.
- The proposed residential accommodation is designed to the Mayor Housing Design Standards and minimum unit standards and provides a suitable mix of larger family units.
- The application design achieves a Code for Sustainable Homes Level of 4, would aim to achieve a BREEAM 'Very Good' rating, relative to commercial floorspace, and would achieve a carbon reduction 19.4% greater than benchmark performance.

7.3 This development proposal therefore accords with the development plan. There are also significant material considerations which weigh in favour of the grant of planning permission.



DOCUMENT 1

SITE PLAN

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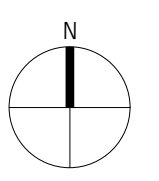
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P1 26/8/14 Draft issue for Pre-App

Revisions



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Project
61-65 Charlotte Street

Drawing Title
Site Plan

Status Planning	Drawn NM	Checked GO
Scale 1:500	Date Aug	

Drwg. No. & Revision
P818_S02_P1

S00 Site Plan
Scale 1:500 (A1, 1:1000 (A3))





DOCUMENT 2

PLANNING HISTORY

Planning History

61 Charlotte Street, London, W1T 4PF

Planning Application Ref.	Application Type	Description of Development	Decision	Decision Date	Decision Notice Obtained?	Comments
CA/1194	Historic	At 61 Charlotte Street, Camden, an internally illuminated double sided projecting box sign having red letters to read PRINTERS on a white ground. Overall projection 4'0", Depth 1'4", Overall height 10'4".	Approved	09/01/1969	Yes	
22421R	Historic	The installation of a new shopfront.	Approved	25/06/1976	Yes	
AD307	Historic	The installation of a static, internally illuminated fascia sign to measure 16' x 1'6" (4.9m x 0.5m) approximately opal panel, recessed, with dark blue letters to read "AZAT (LONDON) LTD"	Approved	25/06/1976	Yes	
P9601371R1	Full	The retention and part-alteration of metal access gantries at the rear servicing plant, as shown on drawing W/1957 and one unnumbered drawing.	Approved	13/02/1997	Yes	
AD579	Historic	The display of an internally illuminated double-sided projecting box sign measuring 2'0" (.61m) by 1'3 3/4"(.4m) fixed approximately 8'0" (2.43m) above ground level on the northern pilaster.	Approved	25/05/1977	Yes	
9401972	Full	The erection of a glazed pitched roof on the existing single storey rear extension together with a new rooflight on an adjoining roof to rear of 59 Charlotte Street as shown on drawing number 274 SK 6D (existing) and two A3 sized drawings numbered sheet 1 of 2 and 2 of 2.	Approved	23/03/1995	Yes	
9500323	Full	The installation of a new shopfront as shown on drawings SK03A; AL10 and sketch A1.	Approved	11/05/1995	Yes	
P9601371	Full	Retention of access gantry and walk way to service air conditioning plant and roof's. (plans submitted).	Withdrawn	03/09/1996	Yes	

63 Charlotte Street, London, W1T 4PF

Planning Application Ref.	Application Type	Description of Development	Decision	Decision Date	Decision Notice Obtained?	Comments
12958	Historic	Change of use of parts of 61-63 Charlotte Street and 33 Tottenham Street W1 from light industrial use to office and residential use and the erection of a first floors extension at the rear of 61-63 Charlotte Street, W1	Refused	10/05/1972	Yes	
9401075	Full	Change of use of ground floor from retail use within Class A1 to a betting office within Class A2 of the Town and Country Planning Use Classes Order 1987 as shown on 1 (A4 size) unnumbered plan.	Approved	15/09/1994	Yes	

61-65 Charlotte Street, London, W1T 4PF

Site Location	Planning Application Ref.	Application Type	Description of Development	Decision	Decision Date	Decision Notice Obtained?	Comments
61-65 Charlotte Street	2013/0014/P	Full	Creation of retail unit for composite A1/A3 use (Sui Generis) at ground floor level of Nos 61 and 63 and basement level of Nos 61,63 and 65 Charlotte Street; three residential units (2 x 2bed and 1 x 3bed) on the upper floors of Nos 61 and 63; new residential entrance at 61. External alterations including new shopfronts to Nos 61-65; flat roof to existing patio area, gangway platform and handrail, exhaust duct, and plant to rear	Refused / Appeal Dismissed	Refused – 07/02/2013 Appeal Dismissed - 21/11/2013	Yes	Reason for refusal: 1. Loss of employment floorspace which remains suitable for use; and 2. The proposed creation of a large dining/restaurant facility would result in an intensification of food and drink uses and would be detrimental to the character of the local area. The inspector upheld that the proposed change of use of the upper floor offices of Nos.61 and 63 to residential use has not been justified.
61-65 Charlotte Street	2005/4770/P	Full	The retention of 2 air conditioning units within a rear courtyard.	Refused and warning of Enforcement Action to be Taken	16/05/2006	Yes	

61-65 Charlotte Street	2005/4772/P	Certificate of Lawfulness (Existing)	Certificate of Lawfulness of existing development for 24no air conditioning units.	Approved	06/02/2006	Yes	
61-65 Charlotte Street	2006/4856/P	Full	The retention of 2x air conditioning units within a rear courtyard to the office (Class B1) building.	Withdrawn	Unknown	No	
65 Charlotte Street	23386	Historic	The installation of a new shopfront.	Approved	05/10/1976	Yes	
65 Charlotte Street	9180138	Advertisement Consent	Display of one internally illuminated projecting box sign measuring 3ft x 2ft in line with the shop fascia sign as shown on 1 x unnumbered plan.	Approved	27/02/1992	No	
65 Charlotte Street	C9601128	Conservation Area Consent	Removal of roof to single storey building at rear of site and replacement of new amdega type at higher level to match that recently erected at No 63. (plans submitted).	Withdrawn	03/07/1996	Yes	
65 Charlotte Street	C9601128R1	Conservation Area Consent	Demolition of roof on building at rear, as shown on drawing number 273 and letter dated 2nd July 1996.	Approved	08/08/1996	Yes	
65 Charlotte Street	P9601127	Full	Removal of roof to single storey building at rear of site and replacement of new amdega type at higher level to match that recently erected at No 63. (plans submitted).	Withdrawn	03/07/1996	Yes	
65 Charlotte Street	P9601127R1	Full	The erection of a new pitched, glazed roof on the building at the rear, as shown on drawing number 273 and letter dated 2nd July 1996.	Approved	09/08/1996	Yes	
65 Charlotte Street	22966	Historic	The change of use of the ground floor from retail shop to snack bar and the installation of a new shopfront.	Refused	02/09/1976	Yes	
65 Charlotte Street	9627	Historic	The use of the basement of 65 Charlotte Street, Camden for storage purposes.	Approved	30/09/1970	Yes	

65 Charlotte Street	CA4506/AD3 81	Historic	The installation of external neon, static illuminated fascia letters measuring 1 ft (0.3m approx.) maximum height and 14 ft 2 ins (4.3m approx.) in length.	Approved	02/09/1976		
65 Charlotte Street	N12/31/11/8 309	Historic	Use for a limited period of basement front room for storage of electrical and other goods at 65 Charlotte Street, W1.	Approved	12/03/1970		



DOCUMENT 3

APPEAL DECISION



Appeal Decision

Hearing held on 8 October 2013

Site visit made on 8 October 2013

by Ron Boyd BSc (Hons) MICE

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 21 November 2013

Appeal Ref: APP/X5210/A/13/2198656

61-65 Charlotte Street, London W1T 4PF

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Charlotte Investment Holdings Ltd against the decision of the Council of the London Borough of Camden.
 - The application Ref 2013/0014/P, dated 19 December 2012, was refused by notice dated 7 March 2013.
 - The development proposed is described as 'Creation of retail unit for composite A1/A3 use (Sui Generis) at ground floor level of Nos. 61 and 63 and basement level of Nos. 61, 63 and 65 Charlotte Street; three residential units (2 x 2 bed and 1 x 3 bed) on the upper floors of Nos 61 and 63; new residential entrance at 61. External alterations including new shopfronts to Nos. 61-65; flat roof to existing patio area, gangway platform and handrail, exhaust duct, and plant to rear'.
-

Decision

1. I dismiss the appeal.

Procedural matters

2. There are minor differences in the descriptions of the proposed development as variously contained on the application form, the Decision Notice and the Statement of Common Ground. That in the heading above is as on the Decision Notice. I consider it to be the most appropriate and it is acceptable to both parties.
3. The appellants have submitted a completed Agreement under the provisions of Section 106 of the Town and Country Planning Act 1990. However, as I have decided to dismiss the appeal on matters which would not be overcome by the Agreement I shall not comment further on it.

Main issues

4. I consider these to be:
 - Whether the proposed loss of employment floorspace can be justified having regard to (a) development plan policies concerning the retention of land and buildings suitable for continued business use, and (b) the effect of such loss on economic activity and employment opportunities within the Borough, particularly in respect of small and medium sized enterprises (SMEs); and
 - whether the proposed dining/restaurant facility would be harmful to the character of the surrounding area.

Reasons

5. The appeal site comprises three terraced properties, Nos. 61-65, within the Charlotte Street Conservation Area on the western side of Charlotte Street between its junctions with Tottenham Street and Goodge Street. Each has four storeys with No. 61 also having an extensive basement which extends under all three properties. No. 61 is a vacant office (Use Class B1 (a)) on all floors. No. 63 previously operated as a hairdressers on the ground floor (Use Class A1) with offices on the two upper floors. A brand-building / film-production company (Magic Light Pictures Ltd) currently occupies the first floor but otherwise this building is also vacant, as is the ground floor of No.65, (Use Class A1) previously occupied by a café. The upper floors of No. 65 are in residential occupation, and other than in respect of the provision of a new shop front as mentioned below, No. 65 does not form part of the application.
6. The proposal is that the upper floors of Nos. 61 and 63 be linked by means of openings in the party wall between the two buildings to provide a residential unit on each of the three combined floors – two-bedroom units on the first and second floors and a three-bedroom unit on the third. On the ground floor retail units would be provided for the sale and display of food and drink produce – a bakery, a green grocer and dry goods are indicated on the submitted drawings. Nos. 61 and 63 would be linked internally by a double-door-width opening within the party wall to provide a combined net retail sales area of some 213 sqm. No internal works to the former café at No. 65 are included in the proposal. This would remain as a separate small retail unit. However, external works in the form of new shop fronts to all three ground-floor units would be carried out, giving the appearance of three separate shops notwithstanding the internal linking of Nos. 61 and 63. The basement would be a composite A1/A3 use with 91sqm of net retail sales area (wine and cheese indicated) and up to 183 sqm of restaurant/dining area to provide a maximum of 67 covers. This Class A3 facility would not function as a separate entity - only as part of the overall A1/A3 composite use. An additional entrance at the southern end of the street frontage of No. 61 would be created to provide access from Charlotte Street to the residential units.

Loss of employment space

7. In terms of gross internal area the proposal would result in the loss of 837 sqm of existing office floor space of which 317 sqm would be from the basement area, 172 sqm from the ground floor of No. 61, and the remainder from the upper floors of Nos. 61 and 63.
8. Policy CS8 of the Council's Core Strategy 2010 seeks to ensure a strong economy in Camden by, amongst other things, safeguarding existing employment sites, with the expectation that the mix of employment facilities in the Borough will include those suitable for small and medium sized enterprises (SMEs). Policy DP13 of the Council's Development Policies states that proposals for a change to a non-business use will be resisted unless it can be demonstrated that the site is no longer suitable for its existing business use and there is no possibility of an alternative business use.
9. There is no suggestion that any business use other than offices would be appropriate for the appeal premises and I accept this to be so. In such a situation Policy DP13 explains that where a change of use has been justified the Council may allow a change to permanent residential uses. The Council's

Supplementary Planning Guidance (CPG5), paragraphs 6.3-6.5, identifies situations where this may be allowed and sets out considerations the Council would take into account in assessing applications for such a change of use from offices to a non-business use. The emerging Fitzrovia Action Plan echoes this flexible approach, particularly in the case of vacant premises originally designed as housing. However the Council's aim of ensuring that the stock of business premises is not reduced in a way that would harm business growth in general, and particularly the birth and growth of SMEs, is clearly stated, together with the recognition that relatively un-modernised premises are often the most attractive to small businesses due to their character, low cost and ease of subdivision.

10. Physical layout and condition, both existing, and that which could reasonable be achieved, are amongst relevant indicators of whether business-use premises would be suitable for a continuation of such use. The level of demand for the present use would inform an assessment of the degree of harm likely to be caused by its cessation and thus the extent of any economic reasons against such a course of action.
11. Having viewed the basement area with its complex physical layout and poor provision of natural light I consider this to be sufficient demonstration that the area is not suitable for continued office use. Accordingly, its loss would not be harmful to economic activity in Camden. I concur with the Council's Officers' Report that in this instance marketing evidence is unnecessary. I conclude that a change of use is justified.
12. The ground floor of No.61 also suffers from poor natural light and to my mind offers an unsatisfactory standard of office accommodation. As estimated by the appellants, and not disputed by the Council, the proposed conversion to retail use would be likely to provide a greater level of employment. The replacement of the present inactive office façade by a retail unit would be more in keeping with, and an enhancement of, the character of the area. I conclude that the above considerations are sufficient to justify the loss of this existing office floorspace.
13. The upper floors of Nos. 61 and 63 broadly retain the layouts of the domestic residences they originally were and are somewhat tired in appearance. Nevertheless, they comprise practically sized rooms with good levels of natural light. The occupation of the first floor of No. 63 by Magic Light Pictures indicates they are capable of providing suitable accommodation for those SMEs requiring such a basic standard of provision, and that there is some demand for such provision. Whilst the Company has arranged to move out in December, discussion with the on-site personnel gave no indication that the move was prompted through dissatisfaction with their current premises. In the light of the above I conclude that it has not been satisfactorily demonstrated that the floorspace is no longer suitable for continued office use.
14. The appeal site lies within the Central Activities Zone (CAZ), an area covering the City of London and parts of neighbouring Boroughs which is identified in the London Plan 2011 as a unique area containing a cluster of nationally and internationally important activities, including the largest concentration of London's financial and business services. The CAZ has been exempted from the recent amendment to the General Permitted Development Order which, for a three year period from May 2013, allows a change of use from office to residential (Use Class C3) without the need for planning permission.

15. The Council is concerned that the temporary ease of conversion of office space to residential outside the CAZ could lead to an overall shortage of employment space within the Borough (contrary to earlier projections of demand for such space being met, stated in the Council's Core Strategy). It contends that this possibility, together with the status accorded to the CAZ by virtue of the exemption, heightens the need to preserve employment floorspace within the CAZ.
16. The Council has advised of an increase in change-of-use development outside the CAZ since May 2013 but this does not amount to conclusive statistical evidence to support the concern of the likelihood of a future overall shortage. To my mind the consideration of change-of-use applications in the light of development plan policy and relevant material considerations provides appropriate protection of employment space within the CAZ. Development plan policies are framed to ensure the retention of employment space which remains suitable for continued employment use. A satisfactory demonstration that this is no longer the case is required to support applications for a change of use and, as I have concluded above, this has not been provided. Whether, notwithstanding the absence of such a demonstration, the loss of the employment space can be justified in the light of relevant material considerations, requires the harm caused by the loss to be identified.
17. In assessing whether, or to what extent, the loss of the facility would be harmful to the economy or employment in the Borough, evidence of the extent of demand for it is necessary. Such evidence is one of the CPG5 considerations and the guidance explains that where it would be difficult to make an assessment using the listed considerations the Council may ask for additional information in the form of a marketing assessment.
18. In putting the case for the proposed conversion to residential units the appellants assessed the proposal against the considerations listed in CPG5. The appellants point out that the premises do not include features required by tenants requiring modern office accommodation. They contend that significant investment would be required to bring the facility up to modern standards, which would not be justified by the level of rent that could subsequently be charged for what would still remain B grade office space.
19. Also that there is a significant existing supply of alternative B grade office floorspace within the area and that the premises would not meet the general demand of SMEs for short-lease, serviced, office accommodation, of which there is also a competitive supply within the area. An opinion supporting these claims has been submitted by RIB Property Consultants and details of office accommodation available in the area as at December 2012 and August 2013 have been provided. However there has been no testing of demand for the appeal premises by any marketing of the office space.
20. In this case, in the light of my conclusion above, I consider that evidence from some marketing of the office space to be necessary to identify the extent of demand and thus the strength of any economic argument against a change of use. It would inform an assessment of whether the loss of the office space could be justified through weighing the effect of such loss against such relevant material considerations including the Council's aim of maximising the supply of additional housing. The submitted claims regarding demand and the lists of alternative accommodation available, whilst establishing that there is other office accommodation available in the area, do not establish that there is no

commercial demand for the office space offered by the appeal premises. They do not amount to a satisfactory substitute for evidence from the premises being marketed, and no marketing has been carried out. Accordingly, I conclude that a convincing case to justify the proposal, notwithstanding the lack of a satisfactory demonstration that the upper floorspace is no longer suitable for continued office use, has been made.

21. The requirements of Policy DP13 have not been met and it has not been demonstrated that there is no reasonable prospect of the continued use of this floorspace for the allocated employment use of Class B1 (a) offices. The circumstances are thus not those referred to in Paragraph 22 of the Government's National Planning Policy Framework that would support consideration of alternative uses. Accordingly, and having taken the advice in paragraph 51 of the Framework into account, I conclude that conversion of the upper floor offices to residential use has not been justified.

The Class A3 use dining/restaurant facility

22. The Council considers the Class A3 use proposed for the basement would result in an intensification of food and drink use detrimental to the character of the area. The surrounding area is generally characterised by a mix of development including retail premises, cafes, restaurants and offices at ground floor with offices or residential accommodation above. The frontage containing the appeal properties comprises Nos. 53-69. The nine individual ground floor frontages appear to be used as an office; a café; a restaurant; a retail unit; an A1 frontage leading to a ground floor and basement restaurant; and four vacant units of which two previously operated as cafés, one as a hairdressers and one as an office.
23. The proposed A3 development in the basement would have no physical effect on the frontage but would be likely to increase footfall through the proposed ground floor A1 retail units at Nos 61 and 63 through which access to the basement would be gained. A condition that the A3 use should be limited to the hours of noon to 22:00 hours Mondays to Saturdays and noon to 18:00 on Sundays and Bank Holidays would be acceptable to both parties. As stated in the Council's Supplementary Planning Document '*Revised Planning Guidance for Central London – Food, Drink and Entertainment, Specialist and Retail Uses*' (RPGCL) this means no customers on the premises beyond the closing times. Subject to compliance with such a condition I consider there would be no unacceptable effect from the A3 use upon the character or appearance of the surrounding area as perceived from the public realm.
24. The appellants explained that the aim was to operate in a similar manner to 'The Natural Kitchen' or 'La Fromagerie' in neighbouring Marylebone. Both comprise a mix of food-related A1 retail and A3 uses and focus on day-time and early-evening operation.
25. To the rear of the buildings the A3 use would not alter the bulk of the building and the proposed rationalisation of extraction and ventilation plant would improve the appearance of the rear elevation. The proposed use of obscured double glazing to the basement roof and the imposition of conditions regarding noise levels would avoid unacceptable intrusion to the detriment of the character of the area viewed from neighbouring dwellings.

26. Notwithstanding that it would introduce additional food and drink use into this length of Charlotte Street I conclude that the A3 use as proposed would not be detrimental to the character of its surroundings. It would preserve the character and appearance of the Conservation Area by leaving it unharmed. As such I consider it would qualify as an exception to the general guidance in the RPGCL that such uses be limited to 100 sqm. As to the reference in paragraph 9.12 of the RPGCL to a maximum of 25% of units in a frontage being for food drink or entertainment uses, Appendix C of the document makes it clear that this only refers to ground floor uses.

Conclusion

27. I have taken into account all the matters raised in the evidence, including that an appeal in respect of a change of use of the front part of the ground floor premises of No. 67 Charlotte Street from A1 to A3 has recently been dismissed. Every appeal should be determined on its individual merits. However, I note that there are some differences between the proposal the subject of that appeal (APP/X5210/A/12/2185792) and the one before me. The Inspector for the previous appeal concluded that the proposed change of use would detract from the mixed use character of the area through the loss of a retail use and an increase in restaurant activity. The increase in restaurant activity would be at ground floor level with the entire ground floor of No. 67 given over to A3 use. In contrast, the proposal the subject of this appeal would add an A1 unit to the Charlotte Street frontage, a positive contribution to the mixed-use character of the area. The A3 use would be contained to the basement, where it would only operate in conjunction with further A1 use. I consider these differences sufficient to preclude the two cases being considered as directly comparable.
28. However, whilst I have found that the proposed A3 use would not be harmful to the character of the area neither this, nor any of the other considerations raised in the evidence, is sufficient to outweigh my conclusion, that the proposed change of use of the upper floor offices of Nos.61 and 63 to residential use has not been justified. For this reason I conclude that the appeal should fail.

R.T.Boyd

Inspector

APPEARANCES

FOR THE APPELLANT:

Mr S Robinson	Executive Director and Head of Planning - CBRE
Mr N Belsten BSc (Hons) MRICS	Director – London Planning - CBRE
Ms S Parkinson	Associate Director - CBRE
Ms A Lee M Arch Msc	Assistant Planner - CBRE

FOR THE LOCAL PLANNING AUTHORITY:

Ms E Heavey	Planning Officer
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INTERESTED PERSONS:

Mr M Neufeld	Secretary - Charlotte Street Association
Mr L Rees	Fitzrovia Neighbourhood Association
Mrs N Shapiro	Neighbouring resident
Mr M Thompson	

DOCUMENTS

- 1 Clarification of correct drawings
- 2 Correct drawings with Schedule`
- 3 Existing and proposed sections
- 4 Charlotte Street Area Office Availability
- 5 Fitzrovia Area Action Plan – track changed version September 2013
- 6 Plan of local residential and Class A3 use
- 7 Unsigned S 106 Agreement
- 8 Location of similar combined A1/A3 use
- 9 PD rights commercial to residential – Mayor of London exemption request
- 10 Charlotte Street Conservation Area Appraisal and Management Plan
- 11 Camden Employment Land Review – Final Report June 2008
- 12 Extract from Kings Cross planning obligation re provision of small business space
- 13 Wording to define permitted business operating times
- 14 PD rights commercial to residential – Camden’s exemption request
- 15 CD – recording of Development Control Committee 28 Feb 2013- submitted 10 October 2013
- 16 Signed and dated S106 Agreement – submitted 17 October 2013



DOCUMENT 4

CAMDEN PRE-APPLICATION RESPONSE

Date: 29 October 2014
Our Ref: 2014/5956/PRE
Contact: David Fowler
Direct Line: 020 7974 2123
Email: david.fowler@camden.gov.uk

**Development Control
Planning Services**
London Borough of Camden
5 Pancras Square
London N1C 4AG

Tel 020 7974 4444
www.camden.gov.uk/planning

Tom Vernon
Ingeni Building
17 Broadwick Street
London
W1F 0AX

Dear Mr Vernon,

Re. Planning Pre-application advice meeting ref. 2014/5956/PRE

**61 - 65 Charlotte Street
London
W1T 4PF**

Description: Erection of mansard roof extension at 4th floor level, redevelopment of rear of properties to provide rear extension at lower ground and ground floor level and shopfront alterations, all in connection with the use of the properties for retail (ground floor), office (ground and lower ground floors) and residential use (4 extra flats).

Documents submitted: Covering letter dated 9/09/2014 (Quod), Pre-Application Design and Access Statement dated September 2014 (prepared by Harper Downie), Heritage Assessment dated August 2014 (prepared by Harper Downie).

I refer to our pre-application meeting held on 15th October 2014 and our subsequent meeting on site on 24th October regarding the above proposal. Set out in this letter is a detailed note of the principal issues regarding the proposal.

Site description

The application site covers an area of 470sqm (0.047ha). It is located on the south-western side of Charlotte Street and consists of 3 buildings located within a terrace, all consisting of a ground floor, basement and 3 upper storeys. There have been significant extensions and alterations at the rear of the properties with the whole site being built over at lower ground level with the exception of 2 small courtyards/lightwells at the rear of nos. 63 and 65. The existing rear extension at no. 61 extends up to first floor level. The site is located within the Charlotte Street Conservation Area. All 3 of the buildings in the terrace are positive contributors to the conservation area. The site is within the Central Activities Zone (CAZ). The site is located within the Central London Clear Zone Region. The site is located within the London View Management Corridor; Parliament Hill summit to the Palace of Westminster. The site is covered by the Fitzrovia Area Action Plan and falls within the Charlotte Street Character Area (4).

The existing uses within the buildings are as follows:

61 Charlotte Street

Ground floor and basement – B1 office use (518sqm)
Upper floors – B1 office use (180sqm)

63 Charlotte Street

Ground floor and basement – B1 office use (96sqm) and cafe (35sqm)

Upper floors – B1 office use (155sqm)

65 Charlotte Street

Ground floor – Class café/restaurant (40sqm)

Basement – Class B1 office (55sqm)

First and second floors (not included in this application) – 2 flats

Third floor – 1 flat (41sqm)

To the north-west of the site (along the terrace) are 67 and 69 Charlotte Street, both comprising 4 storeys, with a restaurant and a café at ground floor (respectively) and residential above. To the south-east of the site, the buildings along the terrace comprise (moving away from the application site) 5, 4, 6, 4 and 5 storeys with Class A retail uses at ground floor and residential/offices above. The terrace in question is located on the south-western side of Charlotte Street between Tottenham Street (to the north-west) and Goodge Street (to the south-east). The area comprises a mixture of ground floor Class A retail uses with residential and offices. To the rear of the site is the rear of the other properties in the block, which front on to the aforementioned streets and also Goodge Place, directly to the rear. This rear area has largely been built on over time. The site is not within a Town Centre, Neighbourhood Centre or Central London Frontage.

The site has a PTAL rating of 6b (Excellent) and is located close to Goodge Street Underground Station, as well as numerous bus services.

Proposal

The proposal is for the following:

- The erection of a mansard roof extension across all 3 buildings at 4th floor level
- The redevelopment of the rear extensions and the erection of a full width rear extension across all 3 buildings at lower ground and ground floor level.
- Rear alteration to the façade, to bring it in line with the proposed internal alterations (floor levels)
- Provision of 2 Class A retail units at ground floor (nos. 63 and 65) and office (entrance) at ground floor of no. 61 and in the proposed rear extension at lower ground and ground floor level. Provision of 7 flats in the upper floors (plus the 2 flats not part of this proposal).

History

Site History

Application Number	Site Address	Development Description	Status	Date Registered	Decision
2013/0014/P	61-65 Charlotte Street London W1T 4PF	Creation of retail unit for composite A1/A3 use (Sui Generis) at ground floor level of Nos 61 and 63 and basement level of Nos 61,63 and 65 Charlotte Street; three residential units (2 x 2bed and 1 x 3bed) on the upper floors of Nos 61 and 63; new residential entrance at 61. External alterations including new shopfronts to Nos 61-65; flat roof to existing patio area, gangway platform and handrail, exhaust duct, and plant to rear.	APPEAL DECIDED (DISMISSED)	07-01-2013	Refused
2006/4856/P	61-65 Charlotte Street London W1T 4PF	The retention of 2x air conditioning units within a rear courtyard to the office (Class B1) building.	WITHDRAWN	15-12-2006	Withdrawn Decision
2005/4770/P	61-65 Charlotte Street	The retention of 2 air conditioning units within a rear courtyard.	FINAL DECISION	23-03-2006	Refused and Warning of Enforcement

	London W1T 4PF				Action to be Taken
2005/4772/P	61-65 Charlotte Street London W1T 4PF	Certificate of Lawfulness of existing development for 24no air conditioning units.	FINAL DECISION	16-12-2005	Granted
P9601371R1	61 Charlotte Street, W1	The retention and part-alteration of metal access gantries at the rear servicing plant, as shown on drawing W/1957 and one unnumbered drawing.	FINAL DECISION	13-09-1996	Grant Full Planning Permission (conds)
P9601371	61 Charlotte Street, W1	Retention of access gantry and walk way to service air conditioning plant and roof's. (plans submitted).	FINAL DECISION	03-05-1996	Withdrawn Application-revision received
9500323	61 Charlotte Street W1	The installation of a new shopfront as shown on drawings SK03A; AL10 and sketch A1.	FINAL DECISION	03-03-1995	Grant Full or Outline Planning Permissn.
9401972	61 Charlotte Street W1	The erection of a glazed pitched roof on the existing single storey rear extension together with a new rooflight on an adjoining roof to rear of 59 Charlotte Street as shown on drawing number 274 SK 6D (existing) and two A3 sized drawings numbered sheet 1 of 2 and 2 of 2.	FINAL DECISION	23-12-1994	Grant Full or Outline Planning Permissn.
9401075	63 Charlotte Street W1	Change of use of ground floor from retail use within Class A1 to a betting office within Class A2 of the Town and Country Planning Use Classes Order 1987 as shown on 1 (A4 size) unnumbered plan.	FINAL DECISION	18-07-1994	Grant Full or Outline Planning Permissn

Considerations

The following issues are material considerations with regards to your proposal:

- Land use
- Proposed housing
- Conservation and design
- Amenity of neighbours
- Transport and highways
- Refuse and recycling
- Security
- Basements
- Sustainability

Land use

Loss of employment

Policies CS8, CS9, DP13 and CPG5 are relevant with regards to the loss of employment use within the Central Activities Zone. The Council will retain land and buildings that are suitable for continued business use, with the expectation that the mix of employment facilities in the Borough will include those suitable for small and medium sized enterprises (SMEs). Policy DP13 explains that where a change of use has been justified the Council may allow a change to permanent residential uses. The Council's Supplementary Planning Guidance (CPG5), paragraphs 7.3-7.5, identifies situations where this may be allowed and sets out considerations the Council would take into account in assessing applications for such a change of use from offices to a non-business use. The Fitzrovia Action Plan echoes this flexible approach, particularly in the case of vacant premises originally designed as housing. Principle 4 of this document supports small and medium enterprises (SMEs).

There are currently 1004sqm of B1 office floorspace over all 3 buildings. This includes 469sqm located in the basement of all 3 buildings. The Inspector stated the following in his appeal decision:

“Having viewed the basement area with its complex physical layout and poor provision of natural light I consider this to be sufficient demonstration that the area is not suitable for continued office use. Accordingly, its loss would not be harmful to economic activity in Camden. I concur with the Council’s Officers’ Report that in this instance marketing evidence is unnecessary. I conclude that a change of use is justified.”

The poor state of the basement area was also notified on the officer’s site visit as part of this pre-application submission. Given the physical condition of the premises, their layout and poor levels of natural light, and the Inspector’s comments above, the loss of office floorspace in the basement area is considered acceptable and marketing information would not be required to justify its loss.

Not taking into account the existing basement office accommodation, there is currently 535sqm of usable Class B1 office floorspace in the buildings. Under the proposals, 841sqm of office floorspace would be provided at lower ground and ground floor levels and there would therefore be an increase of 306sqm of usable office floorspace under the proposals. However, most of this floorspace would be provided at lower ground floor level (530sqm), with the rest provided on the ground floor of no. 61. It must be demonstrated that this new office floorspace would be usable in terms of physical condition, layout and natural light and would provide high-quality and flexible office floorspace, suitable for SMEs. It is noted that the lower ground floor would receive all its natural light from skylights at the rear and voids in the ground floor, which in turn would have a glass roof. No natural light would be received by the meeting rooms at the front of the lower ground floor. The demonstration for demand for this type of office floorspace, for small or medium enterprises, would be necessary to support the proposal. It is noted that the intention is for the proposed offices to be occupied by the applicant (Merchant Land Investments) and their parent company (Holbud Investments Limited). Evidence of these companies intention to move in to the proposed office floorspace would support the proposal. Details of the number of proposed employees on site (50 was stated at our pre-application meeting) should be submitted as part of any future application.

Principle of residential use

Policies CS6, DP2, DP13 and the Fitzrovia Area Action Plan (Principle 1) support the provision of extra residential units in principle (subject to the section above).

Where more than 200sqm additional floorspace is proposed within the Central London Area, policy DP1 requires up to 50% to be housing. The uplift in floorspace is 229sqm and therefore this policy requirement is triggered. As the proposed mansard roof would provide 189sqm of residential, this policy is met.

Class A retail use

Policies CS7, CS9, DP10, CPG5 and the Fitzrovia Area Action Plan (Principle 5) are relevant with regards to retail use.

The 2 existing Class A retail units at the ground floor of 63 and 65 Charlotte Street would be retained under the proposals. It is noted that there would be a slight reduction in the floorspace of no. 63 (35sqm to 32sqm), however there would be an increase for no. 65 (40sqm to 50sqm). The retention of these units is welcomed in policy terms.

Proposed housing

Policies CS6, DP2, DP5, DP6 and CPG2 (Housing) and the Fitzrovia Area Action Plan (Principle 1) are relevant with regards to the proposed housing.

There are currently 3 flats in the buildings, on 1st, 2nd and 3rd floor levels of no. 65. Only 1 of these flats is included as part of this pre-application (the flat at 3rd floor level), and the other 2 flats (which have separate leaseholders) are not included in 'the site'. Under the proposals there would be an uplift of 6 flats to provide 7 flats on the site (plus 2 flats not included in the proposals). These flats would consist of 2 x studio, 2 x one-bedroom, 1 x two-bedroom (duplex) and 2 x three-bedroom (duplex). The duplexes would all be located at 3rd and 4th floor level (in the proposed mansard extension). The flats in 65 Charlotte Street would be accessed via one core and the flats in 61 and 63 accessed via another core.

Policy DP5 requires homes of different sizes to meet the priorities set out in the Dwelling Size Priorities Table (para 5.4 of the text of this policy). Whilst the larger units are welcomed, particularly the two-bedroom unit, a large proportion of the proposed flats are one-bedroom or studio; 4 out of 7. You are advised to provide more two-bedroom units, perhaps by combining the one-bedroom/studio flats.

Affordable housing is not required, in line with Policy DP3 given that less than 10 units and 1000sqm gross residential floorspace is proposed.

CPG2 (4.12) contains minimum floor areas for different flat sizes. The overall internal floorspace in new self-contained dwellings (excluding communal lobbies and staircases) should normally meet or exceed the minimum standards set out in the following table.

Number of Persons	1	2	3	4	5	6
Minimum Floorspace (sqm)	32	48	61	75	84	93

Additionally, the Council will expect bedrooms to meet or exceed the following minimum sizes:

First and double bedrooms - 11.0 sqm
 Single bedrooms - 6.5 sqm.

The proposed residential accommodation should also meet the standards in the London Housing SPG (November 2012) (particularly Annex 1).

http://www.london.gov.uk/sites/default/files/Housing%20SPG%20FINAL%20High%20Res_0.pdf

All of the flats and bedrooms comfortably exceed the above minimum flat sizes.

Ceiling heights should have a minimum height of 2.3m.

All of the proposed flats would be dual aspect, with outlook over Charlotte Street to the front and also to the rear. All of the proposed flats are considered acceptable in amenity terms. Balconies are proposed for every flat at the rear in accordance with the London Plan.

All housing should meet lifetime homes standards. 10% of homes developed should either meet wheelchair housing standards, or be easily adaptable to meet them.

The site has potential for contamination and a Land Contamination Report would therefore be required.

Conservation and design

Policies CS14, DP24, DP25, CPG1 (Design) and the Fitzrovia Area Action Plan are relevant to the design of the proposals.

The site is located within the Charlotte Street Conservation Area and the buildings are recognised as positive contributors to the conservation area.

Concerns exist regarding the detriment to the character and appearance of No. 63 that would result from the addition of a roof extension. The bulk and massing of the proposed mansard roofs would not necessarily be an issue in terms of the street scene and roofscape, since there is clearly some scope for vertical growth in nos. 61 and 65. However, it is considered that the proposed mansard extension would compromise the architectural homogeneity of the frontage of No 63.

A revised design may be acceptable with a reduction in the height of the 2 mansards and a reduction in windows from 3 to 2 on the front roof slope of nos. 61 and 65. A variation in height between the mansards of nos 61 and 63 may also reduce the impact.

Treatment/material and colour is important in the context of the conservation area and a dark standing seam metal roof may be the best option, however it may be more sympathetic to use slates (possibly) or another material instead. Again this option could be for No 63 only. Alternatively a lighter toned metal roof may be more in keeping.

Therefore there are a few options to minimise the impact on No 63 by the use of variation.

The design of the rear elevations and the shop front designs are considered very sympathetic. It is considered that the signage location and proportions etc. should also be more or less agreed in advance of the application for planning and advertisement consent.

Amenity of neighbours

Policies CS5, DP26, CPG6 (Amenity) and the Fitzrovia Area Action Plan (Principle 9) are relevant with regards to the amenity impact on neighbouring properties.

Given the increase in height of the buildings with the proposed mansard roof extension at 4th floor, a Daylight/Sunlight Study should be submitted as part of the application.

The introduction of 7 balconies on the rear elevation, at 1st, 2nd and 3rd floor level is in accordance with London Plan guidelines. It is not considered that the introduction of these balconies would impact in terms of overlooking of the rear of any residential properties, however concerns exist with regards to overlooking the existing roof terrace serving a flat in the terrace, to the north-west of the site (no. 67 perhaps), from the proposed balcony for no. 65. It was not possible to enter no. 65 on site visit and to fully assess the overlooking impact that this balcony would have. The issue of overlooking to this terrace should be addressed as part of any future submission. Images (drawings and/or photographs) showing the relationship between the terrace and balcony in question would be useful. Given the bay shape of the balcony, a screen would not be appropriate. Should there be an overlooking impact from this balcony, it might need to be removed from the proposal.

Full details of all plant proposed should be submitted as part of any future application. A Noise Report would be required.

Transport and highways

Policies DP16, DP17, DP18 and CPG7 (Transport) are relevant with regards to transport and highways issues.

The site has a PTAL of 6b which is 'Excellent'. There is currently no parking or vehicular access on to the site.

The proposal is car-free. The rights of proposed residential units and businesses to apply for a parking permit would be removed under a Section 106 Agreement.

Cycle parking should be provided in line with the standards laid out in Table 6.3 of the London Plan; 1 storage space per one or two bedroom residential unit and 2 spaces per three or more bedroom unit, 4 cycle parking spaces for the proposed B1 office use (1 space per 250sqm or part thereof; 841sqm proposed). Cycle parking spaces for the retail units would also be desirable.

A draft Construction Management Plan (CMP) should be submitted as part of any future application. A full CMP would be secured via Section 106 Agreement.

A Transport Statement should be submitted as part of any future application. This should include details of servicing.

Refuse and recycling

CS18 and CPG1 are relevant with regards to refuse and recycling storage. It needs to be detailed as part of any future application where refuse and recycling would be stored and what the strategy would be for collection. Refuse and recycling storage should be provided in line with CPG1 (Design; Chapter 10 – Waste and Recycling Storage).

Security

Policies CS17 and DP26 are relevant with regards to security.

There are not considered to be any security implications with the proposals, given that there are no significant physical alterations proposed to the front of the buildings and that there is no direct access to the rear areas from the street.

Basements

Significant excavation is proposed at the rear of 63 and 65 Charlotte Street.

Policy DP27 states that developers will be required to demonstrate with methodologies appropriate to the site that schemes maintain the structural stability of the building and neighbouring properties; avoid adversely affecting drainage and run-off or causing other damage to the water environment; and avoid cumulative impact upon structural stability or water environment in the local area.

A Basement Impact Assessment (BIA) should be submitted as part of any future application which satisfactorily demonstrates that the proposal would maintain the structural stability of the building and neighbouring properties; avoid adversely affecting drainage and run-off or cause other damage to the water environment; and avoid cumulative impacts upon the structural stability or water environment in the local area. Detail on preparing a Basement Impact Assessment is contained within CPG4 – Basements and lightwells. The Council is currently getting all BIAs independently reviewed (at the applicant's expense) and a Basement Construction Plan may be secured via S106.

Sustainability

Policy DP22 (Promoting sustainable design and construction) states that the Council will require development to incorporate sustainable design and construction measures. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. Fitzrovia Area Action Plan Principle 10 is also relevant.

Energy efficient design requires an integrated approach to solar gain, access to daylight, insulation, thermal materials, ventilation, heating and control systems. These should be considered in relation to each other when designing a scheme.

Developments involving 5 or more dwellings and/or 500sq m (gross internal) floorspace or more are required to submit an energy statement which demonstrates how carbon dioxide emissions will be reduced in line with the energy hierarchy (see below for more details on what to include in an energy statement). An energy statement should therefore be submitted with an application of this nature which demonstrates how carbon dioxide emissions will be reduced in line with the energy hierarchy. CPG3 - Sustainability provides guidance on what should be included in an energy statement.

The new residential units would be required to meet as a minimum 'Code Level 4' in a Code for Sustainable Homes Assessment and the new commercial floorspace would be expected to meet 'very good' in a BREEAM Assessment. An assessment should be submitted as part of any application submission, with a post construction review to be carried out as a condition/legal agreement of any approval.

The proposal should make provision for water run-off attenuation measures and should ensure green roofs, brown roofs and green walls are proposed where possible. It is noted that green roofs are proposed at the rear. Full details of these should be submitted as part of any future application.

Conclusion

The proposed land use mix is considered acceptable, provided that it can be demonstrated that the proposed office floorspace would be high-quality and flexible. The bedroom numbers provided in the flats should be revised in accordance with the Dwelling Size Priorities Table.

Concerns exist regarding the proposed mansard roof extensions. The other alterations are considered acceptable in conservation and design terms.

Concerns exist regarding overlooking from the proposed balcony on no. 65 to the residential terrace.

Community Infrastructure Levy

The development would be subject to the Mayor of London's Crossrail CIL at £50 per sqm of new floorspace (net uplift) given that more than 100sqm increase in floorspace is proposed.

The Camden CIL is scheduled to be introduced in Spring 2015 and it is possible that the Camden CIL would be adopted by the time any application on this site was determined. The preliminary draft charging schedule, out for consultation, can be found here <https://consultations.wearecamden.org/culture-environment/camden-cil-preliminary>

S106 Obligations

Policy CS19 and CPG8 (Planning obligations) are relevant with regards to planning obligations.

Any residential development will lead to increased pressure on the existing local community facilities within the area, such as the open space, schools, health and leisure uses. As such is it crucial that the development contributes towards supporting, improving and enhancing existing facilities.

Potential s106 terms (subject to change if Camden CIL adopted)

- Car free

- Code for Sustainable Homes 'level 4' minimum
- Construction / Servicing Management Plans
- Education
- Energy Statement
- Highways contribution
- Public Open Space

It is suggested you make early contact with local residents and ward councillors (Bloomsbury ward – please see link for Councillors' details <http://democracy.camden.gov.uk/mgMemberIndex.aspx?FN=WARD&VW=LIST&PIC=0>).

It is also suggested that you contact the Charlotte Street Association to discuss your proposals:

39 Tottenham Street
 London
 W1T 4RX
csafitzrovia@yahoo.co.uk
charlottestreetassociation.yolasite.com

Information to be submitted with any planning application

- Planning Statement
- Design & Access Statement
- Heritage Statement
- Daylight/Sunlight Report
- Transport Assessment and Draft Travel Plan
- Code for Sustainable Homes and BREEAM certifications
- Energy Statement
- Details of Refuse and recycling storage
- Noise (and Vibration) Report and details of necessary attenuation measures
- Draft Construction Management Plan
- Basement Impact Assessment
- Land contamination Report.

Please note that failure to provide all of the above information with any planning application is likely to lead to delays in the application being validated. Please note, this list is not exhaustive, and other documents may be required to validate the application if they are considered necessary at a later date.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Please note that if you (the applicant or their representative) have drafted any notes of the pre-application meeting(s) held with the council you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

If you have any queries about the above letter or the attached document please contact **David Fowler** on **020 7974 2123**.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

David Fowler
 Principal Planning Officer
 West Area Team