

JO/DM/P5781
18th November 2015

Development Management Planning Services
London Borough of Camden
Town Hall
Argyle Street
London
WC1H 8ND

For the attention of Ms Zenab Haji-Ismail

Dear Sirs

Town and Country Planning Act 1990 (As Amended)
1 Birkenhead Street, London, WC1H 8BA
Planning and Listed Building Application – Use of the property as offices (Class B1),
alterations to fenestration and internal alterations.
PP-04618864

We are writing on behalf of our clients Fresson & Tee in support of the applications being made by the freeholders of the above property, Lonprop Establishment. These applications have been submitted via the planning portal and relate to the above property and its change of use to Offices (Class B1) and a series of internal and external alterations to the listed building.

These alterations include the replacement of windows and doors to the front and rear, and internal alterations on all floors to remove unsympathetic modern partitions and to return the house more closely to its original plan form.

The requisite statutory fee for £385 will be submitted separately.

In order to assist you with your consideration of this application please find the following information which has been submitted electronically via the Planning Portal:

- Application form and certificates
- Site Location Plan
- Existing, Proposed and detailed drawings prepared by Fresson & Tee
- Covering Letter
- Heritage Appraisal prepared by Martin O'Rourke
- Completed CIL form

A letter from Fresson & Tee is also being submitted under separate cover. This sets out the justification for the loss of the hotel with regards to its financial viability. This letter should be treated as private and confidential as it contains sensitive commercial data.

Site Description

The site is located just to the south of the Euston Road close to Kings Cross and St Pancras Station.

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The property itself is part of a grade II listed terrace of 7 houses built between c1827 and 1832 and is located within the Kings Cross / St Pancras Conservation Area. Whilst it is located just outside the 'Kings Cross Growth Area', it is located in the 'Central London' area as designated in Camden's Core Strategy and Development Plan. It is currently used as a small hotel containing 9 bedrooms (2 of which are for staff use). Located to the rear of the property, accessed via the undercroft mews style entrance, is a low level modern office infill development.

Despite its central location Birkenhead Street is a quiet side street which would have originally been residential in character. It currently has a mix of uses including offices and residential flats. The wider area incorporates a host of retail and entertainment uses including shops, hotels, bars, cafes and restaurants.

Relevant Planning History

Listed building consent was granted in April 2008 (Ref: 2008/0852/L). This approved the installation of glazed double doors between the entrance hallway and front room, as well as the insertion of a door at third floor level.

The officers report noted that the original partition had already been removed within the ground floor at some point in its past, and that the current partition had been pushed further into the front room. It also noted that throughout the building the original doors had all been replaced with modern flat doors. It also noted that the rooms at third floor level retained none of their original character.

In 2012 permission and listed building consent (Ref: 2012/2400/P) were refused for the erection of three two-storey pods, with associated raised access walkways and staircase, and one single storey pod within mews courtyard, to be used as 7 additional bedrooms to the existing Rough Luxe Hotel.

Background and Pre-application Consultation

The applicant is seeking planning permission and listed building consent to change the use of the building from hotel to offices and to carry out alterations to the windows, doors and internal parts, with the overall aim to create a building which is suitable to the needs of the modern office user whilst respecting and repairing the historic building within which it sits.

This application follows a pre-application enquiry (ref: 2015/1178/PRE) for the same. Following a site visit, officer advice was provided in a letter dated 27th March 2015.

This letter confirmed that local policy protecting hotels could be overcome in this instance if sufficient justification could be provided to demonstrate that the current hotel was no longer a viable use.

Listed building advice was also provided which confirmed that office use would be more suitable for a building of this age as its impact would be less intensive compared with a hotel use. Advice was also given in relation historic plan form, and it was confirmed that the application should include proposals to replace the inappropriate modern windows on the front elevation.

Proposals and Policy considerations

Land Use

This proposal seeks permission to change the use of the building from a 7 bedroom hotel (plus 2 staff rooms) (Class C1) to offices (Class B1).

The loss of the hotel use is considered against **Policy DP14** (Tourism Development and Visitor

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Accommodation). Whilst this seeks to protect existing visitor accommodation in this location, at pre-application officers advised that if justification is provided to demonstrate that the hotel is no longer a viable use, its loss and conversion to offices would be likely to be considered acceptable.

A letter prepared by our client (and the applicants' surveyors) Fresson & Tee has been included as part of this application (hard copy submitted under separate cover), and seeks to provide this required justification. This letter sets out the background to the hotel operating on this site and confirms that the hotel only has 7 bedrooms available for let. Furthermore, on each floor there is a 2 bedroom suite sharing a bathroom. This accommodation can only be fully let if occupied by a family or large group, which when not possible, has an obvious impact upon the profitability of the hotel.

The financial information provided illustrates that annual turnover has fallen by 10% in the last 4 years, and that the hotel has consistently run at a loss over this time period.

The small size and footprint of this building, coupled with its listed status renders any opportunity to extend the building or re-plan its interior to maximise income extremely limited. Its constricted nature is plainly evident when visiting the site, and the sites limited capability to extend is also partially illustrated by the refusal of planning permission and listed building consent in 2012 (Ref: 2012/2400/P).

Pre-application advice from officer's also confirmed that an office use is less intensive than a hotel use and would have a reduced impact on this heritage building. In any event, officers may consider that any increase in bedroom numbers to be inappropriate in this relatively quiet side street.

The proposed office use is clearly supported in policy. Core Strategy **Policy CS8** promotes office development in appropriate areas including Kings Cross and the 'Central London' designated area, within which this site is located. The office use would also increase employment on this site over and above the levels in the existing use. The office use could create up to 20 full time jobs. An increase of 18 over the two full time jobs currently provided. It is also likely that the offices would be used by the existing occupier of the two storey office building located in the mews to the rear. This proposal would allow this local company to expand without needing to relocate to another area.

The proposed office use sits comfortably within relatively quiet side street, and in recent years several new hotels have opened in the wider Kings Cross Area, which have met the demand for hotels in this area.

In summary, it is considered that notwithstanding Policy DP14, there are both strong policy reasons and other material considerations which would support the change of use from hotel to offices on this site. Those considerations have been set out in detail above and are listed below for reference:

- Current hotel operation running at a loss for last 4 years
- Very limited opportunity to extend or alter this listed building to increase bedrooms
- A more intensive use of this building as a hotel is not desirable in any event for both heritage and amenity reasons
- Office use in this area is strongly supported by policy
- Change of use would increase employment potential of site by up to 18 full time jobs
- Will allow for expansion of existing local business and employment generator
- Office use of building sits comfortably within existing mix of uses on this street
- Several new hotels opened or opening within the Kings Cross Area. The loss of 7 hotel bedrooms will not materially harm the stock of visitor accommodation in this area.

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Heritage and Design

A full Heritage Appraisal has been produced by Martin O'Rourke and accompanies this application. This appraisal sets out the history of the site and provides a detailed commentary on the building.

The building is part of a grade II listed terrace. However, the building has clearly been compromised over the years and several interventions over its history have resulted in a muddled non-historic plan form and inappropriate modern windows and doors to the front and rear, which have a harmful impact upon the appearance of this building and the wider conservation area.

These proposals propose a series of alterations both internally and externally which will return much of the building to its historic plan and will repair and restore the buildings facades and historic integrity. The proposals include the following-

- Installation of single glazed six-over-six sliding sash timber windows on both the front and rear elevations as detailed within the proposed drawings and details drawings.
- Installation of historically appropriate six-panelled timber entrance doors to both the front and rear.
- The removal of hotel ensuite bathrooms and all modern partitions
- Appropriate internal painted timber panelled doors would be installed throughout the building
- The original staircase would be retained and repaired
- The historic plan form at ground, first, second and third floors would be referenced throughout with the use of reinstated partitions and/or nib walls.

The benefits arising from these alterations above, coupled with the less intensive use proposed, are considered to significantly outweigh any perceived impact that the proposals may have upon the special historic or architectural interest of the building, and as such the proposals should be considered acceptable in light of the guidance outlined within paragraphs 126 (as set out in the accompanying Heritage Appraisal), 128, and specifically 131 and 134 of the NPPF, which are set out below..

Paragraph 131 of the NPPF states that in *determining planning applications, local planning authorities should take account of:*

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness.*

Paragraph 134 of the NPPF states that *where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.*

The London Plan seeks to:

- Identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate and

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development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail (**Policy 7.8**).

- Make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm (**Policy 7.9**).

In line with the adopted London Plan policies, the proposed works will preserve and reinstate the key features of the building whilst the interventions will be sympathetic to the buildings original plan form, materials and architectural detail.

Development Plan **Policy DP24 – Securing High Quality Design** states the principles enshrined within Core Strategy policy CS14 – Promoting high quality places and conserving our heritage will ensure that all parts of Camden’s environment are designed to the highest possible standards and contribute to providing a healthy, safe and attractive environment.

Development Plan **Policy DP25 – Conserving Camden’s Heritage** states that the council will only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building.

The application will accord with the relevant Camden planning policies as the proposed building seeks to preserve and enhance the character and appearance of the Kings Cross Conservation Area and the seeks to enhance the buildings historic integrity.

As an overall package it is considered that the proposals are in line with CS14, DP24 and DP25 and will therefore enhance the character and appearance of the conservation area, its setting and will not cause harm to the special interest of the listed building. .

Amenity

This quiet side street is essentially residential in character, but consists of both a mix of offices and residential. The introduction of office accommodation in the place of an unrestricted hotel use would enhance local residential amenity by reducing the coming and goings late at night and early in the morning, and would generally be more in keeping with the other uses on the street.

Cycle storage and waste

Cycle storage for two bicycles is provided at ground floor level to the rear of the property. Whilst this storage is external, it is secure as it is located within a private mews/courtyard. This complies with the requirement for B1 office accommodation as set out in the Further Alterations to the London Plan 2015. The listed nature of the building has limited the options for cycle storage in other location.

Similarly, the proposed office use would utilise the existing hotels arrangements for waste and recycling storage (although an office use would generate far less waste than a hotel) located in the rear courtyard. From this location the bins can then easily be transferred to the street on collection day via the undercroft/mews entrance.

Conclusion

The scheme clearly brings benefit in the form of the increased and improved commercial accommodation, and will result in an increase in the level of employment generated by the site. It also provides the opportunity to significantly enhance this listed building which has suffered from several unsympathetic alterations and additions over the years.

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Having regard to the above and the enclosed material, we trust the council will agree that the proposals are acceptable and look forward to receiving a speedy and positive decision. However should you require any further information or wish to discuss any of the enclosures please do not hesitate to contact the undersigned.

Yours faithfully

A handwritten signature in black ink that reads "John Osborn". The signature is written in a cursive style with a long horizontal flourish at the end.

John Osborn
Rolfe Judd Planning Limited