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Planning statement

51 – 52 Tottenham Court Road



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Contents

1.	Introduction.....	3
2.	Site and Surroundings	4
3.	Relevant Planning History	8
4.	Proposal	11
5.	Planning Policy	13
6.	Planning Policy Analysis	15

1. Introduction

- 1.1 This planning statement has been produced on behalf of Dome Assets Limited to accompany a planning application for the redevelopment of 51 & 52 Tottenham Court Road, London, W1T 2EH.
- 1.2 The proposal comprises the extension and refurbishment of both existing buildings to provide a five storey (ground to fourth floor), plus basement mixed use retail, office and residential development. This includes rebuilding of extensions to the rear of both buildings, and creation of an additional storey to both buildings.
- 1.3 This statement provides background information on the site and an assessment of the site's compliance with planning policy and other material considerations. The statement is set out under the following sections –
- **Section 2** outlines the site and its context within the surrounding area;
 - **Section 3** provides an overview of the planning history;
 - **Section 4** outlines the relevant planning policy;
 - **Section 5** examines the main planning considerations;
 - **Section 6** draws our conclusions.
- 1.4 The planning application is supported by the following consultant reports –
- Construction Management Plan and Construction Traffic Management Plan (supporting Environmental Impact Assessment and Controls) prepared by M.E.F. Construction Services;
 - Site Investigation Report prepared by Ground Engineering and Basement Impact Assessment prepared by Ellis and Moore;
 - Townscape Assessment prepared by Peter Stewart Consultancy;
 - Environmental Noise Survey and Plant Noise Criteria prepared by Applied Acoustic Design;
 - Energy and Sustainability Statement prepared by Mecserve;
 - Air Quality Assessment prepared by Aether;
 - BRE Sunlight and Daylight report prepared by Right of Light Consulting.

2. Site and Surroundings

- 2.1 The application site comprises two properties – 51 and 52 Tottenham Court Road, London, W1T 2EH. The application site is located on the western side of Tottenham Court Road, south of Goodge Street underground station and north of Tottenham Court Road’s junction with Oxford Street.



Image above: Location of 51 & 52 Tottenham Court Road

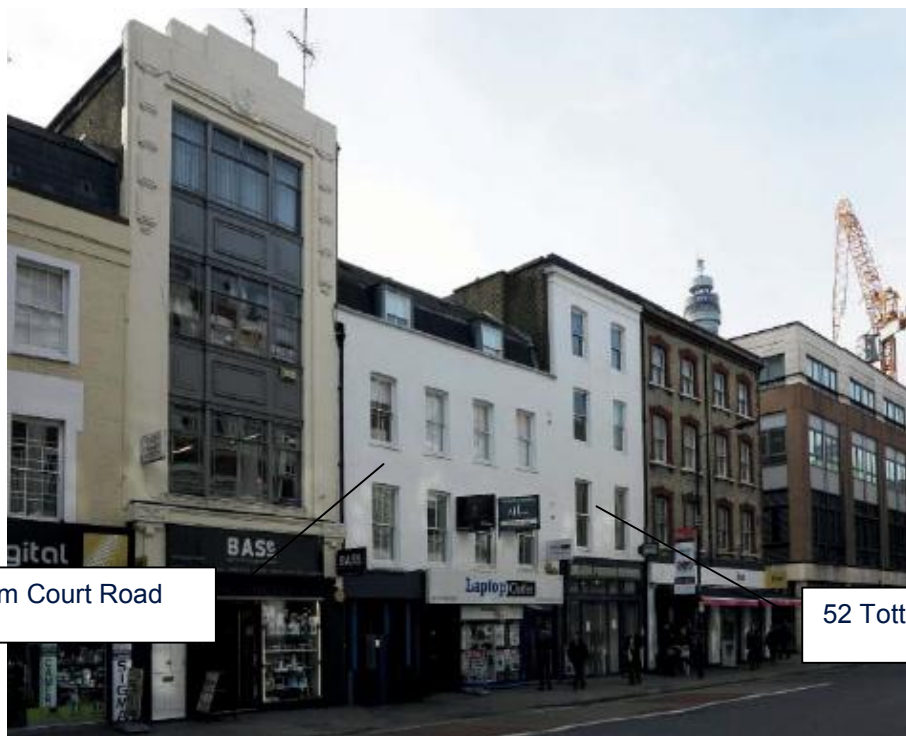


Image above: View of 51 & 52 Tottenham Court Road

- 2.2 Both properties, 51 and 52 Tottenham Court Road, contain an existing self contained mixed use building.

51 Tottenham Court Road

- 2.3 The building at 51 Tottenham Court Road comprises four storeys (ground, first, second and third floor) plus partial basement and provides a mix of retail and residential space. The retail use is situated primarily on the ground floor but also benefits from some existing basement space. The first, second and third floor were all last in use for residential purposes, in the form of four self contained flats (two units on first floor level, one unit on second floor level and one unit on third floor level).
- 2.4 The building has a modern ground floor shopfront, which is primarily formed from a painted aluminium frame and glazing. The first and second floors are constructed from brick and are painted white, whilst the mansard roof is tiled with two small front dormer windows. The building has a relatively plain façade, with four bays and without any mouldings or decorative window surrounds. The windows themselves are sliding timber framed sash windows.
- 2.5 Part of the ground floor provides a right of way to the rear of the building, which will be maintained within any future proposals. To the rear, the building has been extended up to the second floor level and has a collection of unsympathetic structures to its rear elevation.



Image above: View of extensions to the rear of 51 Tottenham Court Road

52 Tottenham Court Road

- 2.6 This building also extends to four storeys in height (ground, first, second and third floors), although has a different hierarchy to its neighbour at 51. The building has a partial basement towards the front of the site. The ground and partial basement are occupied by a retail unit and the first to third floor levels are laid out as offices.
- 2.7 The property has a modern retail frontage at the ground floor level, which has recently been replaced with an aluminium and glass shopfront. The three upper floors are all constructed in brick and have been painted white. The building has two bays, has a flat roof with modest parapet detail, and contains six sliding sash windows (one over one pane).

2.8 At the roof level, the building has an existing stair access room which leads out onto a flat roof. There are existing condensers situated on the roof. To the rear, the building has been extended up to the first floor level.



Image above: View of extensions to the rear of 52 Tottenham Court Road

Surrounds

2.9 Both properties are bound to the rear by existing commercial office buildings. To the north, they are bound by a part retail, part residential building. To the south, they are bound by a part retail, part commercial building.



Image above: Rear elevation of commercial buildings along Kirkman Place



Image above: Rear elevation of commercial buildings along Whitfield St

Land Use Designations

2.10 The properties are subject to the following planning designations, as set out on the Core Strategy Proposals Map –

- Designated View (Parliament Hill to Palace of Westminster);
- Central London Frontage;
- Central London Area;
- Conservation Area – Charlotte Street;
- Fitzrovia Area Action Plan.

2.11 Neither building is listed, although they are designated as ‘positive contributors’ in the Charlotte Street Conservation Area Appraisal and Management Plan (2008). This designation applies to 47 – 54 Tottenham Court Road (respectively).

2.12 The nearest listed building is the Rising Sun Public House at 46 Tottenham Court Road.

3. Relevant Planning History

3.1. The relevant planning history of the property is summarised below.

Previous planning applications

- 3.2. A planning application (ref no. PS9804744R1) was submitted in relation to 51 Tottenham Court Road for the following development – *Change of use and conversion of the first, second and third floors from offices (use class B1) to use as four self contained flats together with alterations to fenestration on the front elevation and the installation of a new shopfront. As shown on drawing numbers SV/GA/01A, SV.02; SV03; SV04; SV05; GA.02A; GA.03A; GA.04 and GA.08.* The Council granted this application subject to a s106 agreement on 07 October 1998.
- 3.3. A planning application (ref no. 2009/5669/P) was submitted in relation to 51-52 Tottenham Court Road for the following development – *Erection of six storey building and excavation of basement to create retail space (Use Class A1) at ground and basement levels, and 3 x 2 bedroom flats, 2 studio flats (Use Class A3) and 20 bedrooms for student accommodation with shared facilities (Sui Generis) on the floors above, following demolition of the existing buildings.* The Council refused this application on 24 August 2010.
- 3.4. A planning application (ref no. 2009/5947/C) was submitted in relation to 51-52 Tottenham Court Road for the following development – *Demolition of existing four storey buildings.* The Council refused this application on 24 August 2010.
- 3.5. The refusals of planning applications 2009/5669/P and 2009/5947/C were not appealed.
- 3.6. A planning application (ref no. 2011/2286/P) was submitted in relation to 51-52 Tottenham Court Road for the following development – *Erection of roof extension to 4th floor and alterations to front elevation in connection with provision of additional 2-bed self-contained flat (Class C3).*



Image – proposed front elevation (ref no. 2011/2286/P).

- 3.7. The Council refused this application on 17 October 2011 and an appeal (ref no. APP/X5210/A/11/2166925) was dismissed by the Planning Inspectorate on 26 April 2012. The Inspector found that reasons for refusal 2 relating to a planning obligation for care free housing and reasons for refusal 3 relating to a construction management plan could have been dealt with via condition.
- 3.8. Reason for refusal 1 related to the roof extension to 51 Tottenham Court Road. The Inspector found that the extension would alter the form of the original building and therefore, its relationship to the buildings either side of it. In their opinion, the change to this relationship would affect the appearance and character of the Conservation Area.

Pre-application advice

- 3.9. A pre-application request (ref no. 2014/7940/PRE) was submitted in relation to 51-52 Tottenham Court Road for the following development – *Demolition of existing rear extensions at Nos. 51 and 52 and roof of No. 51. Erection of rear extension from basement to third floor level to No.51 and use as retail accommodation at ground and basement level, use of part ground, part first, part second and part third floor for residential (Class C3) purposes as 3 x 2 bed flats and use of part first, second and third floor level as offices (Class B1). Erection of rear extension from basement to third floor level at No. 52 to provide office (Class B1) accommodation. Erection of mansard extension to Nos. 51 and 52 to provide 2 x 2 bed flats at new fourth floor level. Associated external alterations including installation of new shopfront for retail unit at 51-52 and creation of roof terraces at front and rear fourth floor level.* The Council issued their pre-application advice on 18 February 2015.
- 3.10. The pre-application scheme sought advice on the extension and conversion of the existing buildings (51 & 52 Tottenham Court Road) to provide a high quality mixed use retail, office and residential development. The pre-application scheme aimed to respond to the refusal of previous planning applications and the dismissed appeal. Key elements of the pre-application scheme included –
- Demolition and reconstruction of the existing rear additions (extending to third floor level);
 - Extensions at roof level to both properties;
 - Provision of 314sqm of retail floorspace (2sqm increase); 649sqm of office floorspace (464sqm increase); and 468sqm of residential floorspace (120sqm increase);
 - Residential, office and retail cycle storage facilities;
 - Amalgamation of retail units and new shopfront.
- 3.11. The following table summarises the pre-application advice issued by the Council and highlights how the revised scheme responds to the pre-application advice –

Proposal	Council's comments	Applicant's response
Demolition of the extensions at the rear of the building.	No objection	n/a

Amalgamation of retail units and upgrade to the existing shopfront.	No objection	n/a
Minor increase in retail floorspace.	No objection	n/a
Principle of providing office and residential floorspace.	No objection	n/a
Quality of retail, office and residential floorspace proposed.	No objection	n/a
Lack of residential floorspace provided in accordance with Policy DP1 (including mixed use policy).	Concern	Quantum of residential floorspace increased to comply with Policy DP1. Further information provided in sections 6.10 to 6.14.
Proposed roof extensions. In relation to 51, the Council considers that the proposal would alter the form and proportions of the original building, historic streetscape and relationship with adjoining buildings (49). In relation to 52, the Council considers that the proposal would sit significantly higher than the adjoining buildings and create an overbearing effect.	Concern	Further analysis of the existing building and surrounding area has been carried out and further justification has been provided in relation to the proposed roof extensions at sections 6.29 to 6.67.
Proposed rear extensions. The Council considers the bulk and mass of the extensions to be unacceptable and these would alter the historic and established townscape. The extensions result in a sense of enclosure to and loss of outlook from surrounding properties. The Council recommended that the extensions extend no further than first floor level; but acknowledged that the extensions would not be visible from the public realm.	Concern	Further analysis of the existing building and surrounding area has been carried out and further justification has been provided in relation to the proposed roof extensions at sections 6.29 to 6.67.
Council requires the development to be car free.	Note	The proposal does not comprise off-street car parking.
Council requires 10 cycle parking spaces to be provided.	Note	The proposal will include cycle parking spaces for the retail, office and residential components.
The Council requires supporting reports including Construction Management Plan, Sustainability Statement, Basement Impact Assessment, Sunlight and Daylight Assessment.	Note	The planning application is supported by a Construction Management Plan, Sustainability Statement, Basement Impact Assessment, Sunlight and Daylight Assessment.

4. Proposal

4.1. This planning application proposes the extension and refurbishment of the existing buildings at 51 and 52 Tottenham Court Road to provide a five storey (ground to fourth floor), plus basement mixed use retail, office and residential development.

4.2. The proposal will involve –

- Demolition of the existing rear additions and structures – to second floor at 51 Tottenham Court Road and to first floor at 52 Tottenham Court Road.
- Demolition of the existing mansard roof extension at 51 Tottenham Court Road.
- Demolition of existing shop fronts to Tottenham Court Road (51 and 52).



Image – proposed demolition to front and west elevation.

- Extension of the existing basements to the rear of the site (51 and 52).
 - Amalgamation of the existing retail units and replacement of retail shop fronts.
 - Reconstruction of the existing rear additions to provide ground, first, second, third and fourth floor levels.
 - Creation of a new third floor level to match the floors below and mansard roof extension to provide a fourth floor level at 51 Tottenham Court Road.
 - Creation of a roof extension to provide a fourth floor level at 52 Tottenham Court Road.
- 4.3. The proposal aims to vastly improve the quality of the retail, office and residential floorspace as well as significantly improving the appearance of the building to Tottenham Court Road, particularly at the ground floor level which is currently in a poor condition. Another key aspect of the proposal is to improve the legibility of the building at the rear, by removing unsympathetic and irregular extensions and replacing these with a coherent extension.



Image – proposed front elevation.

4.4. The proposal will provide the following uses –

Use	Floors	Floorspace (sqm) GEA	Uplift (sqm) GEA
A1 Retail	Basement and ground	312	0
B1(a) Office	First, second and third (to the rear)	474	289
Class C3 Residential	First, second, third (to the front) and fourth	667	319

4.5. The residential floorspace will be divided into 5 dwellings in the following configuration –

Dwelling	Floors	Bedrooms	Size (sqm) GIA
1	First	2 bedroom / 4 persons	68
2	Duplex – first and second	1 bedroom / 2 persons	55
3	Second	2 bedroom / 4 persons	69
4	Third	2 bedroom / 4 persons	100
5	Fourth	3 bedroom / 6 persons	162

4.6. Following the Council’s pre-application advice, minor alterations to the internal layout of the building have been made. This includes –

- Location of cycle and refuse storage space at basement level;
- Location of lift and stair core;
- Increase in the residential floorspace at first, second, third and fourth floor levels;
- Increase to the setback of the roof extension at 52 Tottenham Court Road.

5. Planning Policy

- 5.1. This section of the statement outlines the relevant national and local planning policies against which the proposals are considered.

National Planning Policy Framework

- 5.1 The National Planning Policy Framework (March 2012) sets out the Government's planning policies for England and has replaced the majority of the existing Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs) with immediate effect. The NPPF is a material consideration in planning decisions.
- 5.2 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 14). It states, at paragraph 17, that planning should proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs.
- 5.3 The NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development. To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed use communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.
- 5.4 The NPPF states that within the context of building a strong, competitive economy, the Government is committed to securing economic growth in order to create jobs and prosperity; and is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Local planning authorities are required to proactively meet the development needs of business and support an economy fit for the 21st century.
- 5.5 The NPPF provides the Government's national planning policy on the conservation of the historic environment, and replaces Planning Policy Statement 5. Paragraph 129 states that – 'Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal'.
- 5.6 The NPPF advises that in determining planning applications, local planning authorities should take account of –
- The desirability 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 viability; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.

Local and Regional Policy

- 5.7 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that any planning application must be determined in accordance with the development plan for the area unless any material considerations indicate otherwise.
- 5.8 Camden's 'Development Plan' comprises the Core Strategy and the Development Policies document both which were adopted in November 2010. Also of relevance to the planning application is the Charlotte Street Conservation Area Appraisal and Management Plan (2008) and Camden Planning Guidance Documents 1, 2, 3, 4, 6, 7 and 8.
- 5.9 Camden's Local Plan has been subject to consultation but does not yet form part of the Council's 'Development Plan.'
- 5.10 The London Plan (2011) and National Planning Policy Framework (2012) are material planning considerations when determining planning applications within Camden.

6. Planning Policy Analysis

6.1. This section of the statement sets out an analysis of the proposals against the current development plan, focusing on the following –

- Land use (including mixed use development);
- Standard of accommodation;
- Design and Heritage;
- Amenity;
- Access, Cycle Parking and Refuse;
- Sustainability;
- Air Quality;
- Construction Impacts;
- Subterranean Development.

Land Use

6.2. Policy CS1 of the Core Strategy sets out that the Council will promote the most efficient use of land and buildings in Camden by –

- Seeking development that makes full use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.
- Expect high density development in Central London, town centres and other locations to be well served by public transport;
- Expect the provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the Borough, including an element of housing where possible.

6.3. Policy CS9 of Camden's Core Strategy promotes the Central London area as a successful and vibrant area having regard to its unique role and character. There is a need to provide homes, offices, hotels, shops and other uses; development must contribute to the area's economy as well as meeting the needs of the local community including residents and their quality of life. The amenity of residential properties will be protected, additional homes will be encouraged, the historic environment will be conserved and active transport methods will be encouraged.

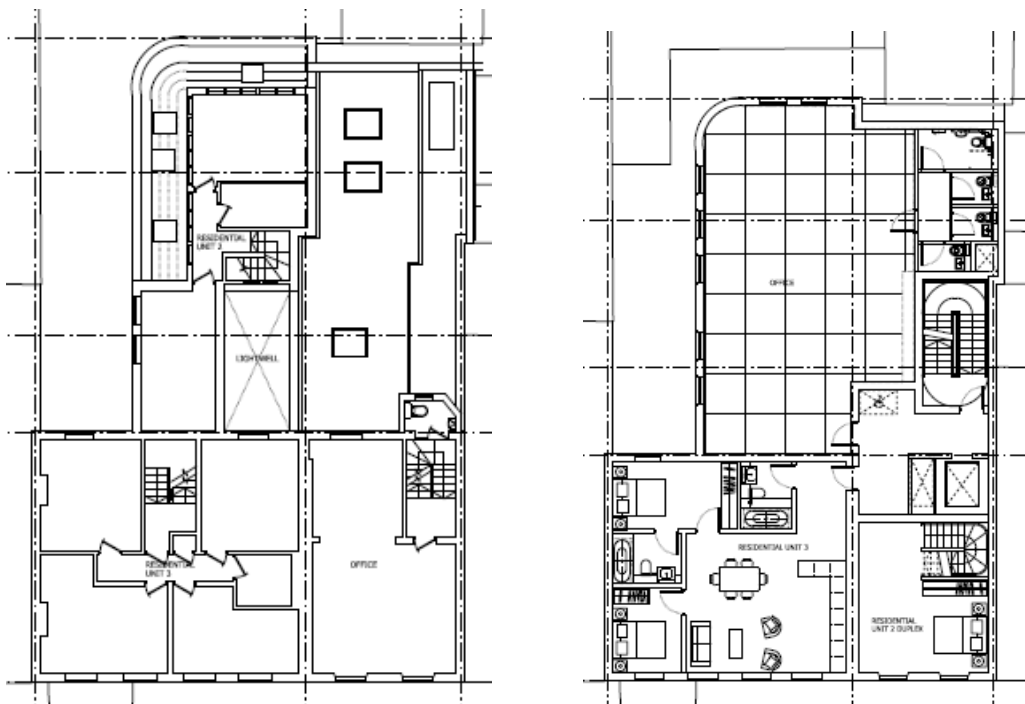
6.4. The buildings are currently arranged for mixed retail, residential and office use. It is not proposed to introduce any further uses, or to lose any of the existing uses. The proposals include the provision of 289sqm of additional office space (total 474sqm) and 319sqm of additional residential floorspace (total 667sqm).

Retail

- 6.5. Policy CS7 of the Core Strategy states that the Council will protect and promote independent shops, and will resist the loss of shops where this would cause harm to the character and function of a centre. Tottenham Court Road is a 'Central London Frontage' where new retail will be promoted and existing floorspace protected.
- 6.6. The proposals involve the retention of the existing retail floorspace at the ground floor level and creation of additional good quality retail floorspace at basement floor level. The quality of the retail floorspace will be vastly improved by the proposal which will promote the Central London economy within this part of the Borough.

Offices

- 6.7. Policy DP13 states that the Council will retain land and buildings that are suitable for continued business use. Where a mixed use redevelopment is proposed, the Council will seek to maintain and/or increase the existing employment floorspace on the site.
- 6.8. The proposals involve the provision of an additional 289sqm of office floorspace. Given the Central London location of the site and its accessibility, this is considered to be a welcome opportunity.
- 6.9. The existing office floor plates are small and have only limited space for staff toilets, kitchens and storage. The proposed offices will offer larger and more flexible floorplates, and will be better served an ancillary spaces. The offices will provide for additional employment opportunities and also represent an improvement on the quality of the office floorspace currently available on the site. The office floorspace on the third floor will have access to a private external terrace at the rear of the building.



Images – existing and proposed second floor plan demonstrating the vast improvement on existing office floorspace

Residential

- 6.10. Policy DP2 of the Development Policies seeks to maximise the supply of additional housing in the Borough. This is also advocated by Policy CS6 of the Core Strategy, which aims to make full use of Camden's capacity for housing and to meet the targets set out within the London Plan.
- 6.11. The building at 51 Tottenham Court Road currently contains 4 self contained flats, which are situated on the first, second and third floor. All existing flats are to be retained (and refurbished), and one additional flat is proposed as part of the redevelopment scheme. The principle of providing additional residential units on the site accords with the policies set out within the Core Strategy and Development Policies.
- 6.12. The existing building provides some poor quality living space, particularly at the rear of the building. The proposal provides an opportunity to improve the existing dwellings.
- 6.13. It should be noted that in accordance with Policy DP3, the proposal does not trigger an affordable housing provision.

Mixed Use Policy

- 6.14. Policy DP1 of the Camden Development Policies promotes mixed use development within the Borough, including a contribution towards the supply of housing. In the Central London Area, where more than 200sqm (gross) additional floorspace is provided, the Borough will require up to 50% of all additional floorspace to be housing.
- 6.15. As the additional commercial floorspace exceeds 200sqm, there is a requirement to provide up to 50% of the additional area as housing under mixed use policy DP1. Based upon an uplift of 289sqm of commercial floorspace, the policy requires 144.5sqm to be provided as residential.
- 6.16. The proposals will provide 319sqm of additional residential floorspace (total 667sqm). This complies with the Council's Mixed Use Policy and is therefore considered to be an appropriate provision of residential floorspace at the site.

Residential development

Dwelling mix

- 6.17. Policy DP5 of Camden's Development Management Policies sets out that the Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes. According to the Dwelling Size Priorities Table – 40% of market dwellings are to be 2 bedroom flats; while 3+ bedroom dwellings are medium priority and 1 bedroom dwellings are low priority.
- 6.18. The proposal will provide three 2 bedrooms flats (60%), one 1 bedroom flat (20%) and one 3 bedroom flat (20%). This is considered to be in line with the Council's preferred dwellings mix set out in Policy DP5. This mix also improves on the existing dwelling mix (75% 2 bedroom flats and 25% 1 bedroom flats) with the inclusion of one family sized dwelling which are considered to be 'medium priority' as set out in Policy DP5.

Accessibility

- 6.19. Policy DP6 of Camden’s Development Management Policies sets out that all housing should meet lifetime homes standards, with 10% of homes being wheelchair accessible.
- 6.20. The circulation core through the building is designed with a wheelchair accessible lift that provides level access to all floors and the new escape stair will have allocated space for disabled refuge as outlined in the Building Regulations. This is in line with Policy DP6.

Layout and Standards

- 6.21. Policy DP26 of Camden’s Development Management Policies sets out that developments will be required to provide an acceptable standard of accommodation in terms of internal arrangement, dwelling and room sizes and amenity space. Facilities for waste and cycle storage will be required; and outdoor space for private or communal amenity space will be encouraged where practical.
- 6.22. The nationally described space standards were introduced in March 2015 and require dwellings to meet the following standards –
- 2 bedroom / 4 persons – 70sqm;
 - 1 bedroom / 2 persons (duplex) – 58sqm;
 - 2 bedroom / 4 persons – 70sqm;
 - 3 bedroom / 6 persons – 95sqm.
- 6.23. The residential floorspace will be divided into 5 dwellings in the following configuration –

Dwelling	Floors	Bedrooms	Size (sqm)	Existing / proposed	Compliance with internal space standards
1	First	2 bedroom / 4 persons	68	In situ	Minor non-compliance – 2sqm
2	Duplex – first and second	1 bedroom / 2 persons	55	Relocated	Minor non-compliance – 3sqm (complies with Camden’s guidance)
3	Second	2 bedroom / 4 persons	69	In situ	Minor non-compliance – 1sqm
4	Third	2 bedroom / 4 persons	100	In situ	Exceeds (30sqm)
5	Fourth	3 bedroom / 6 persons	162	New	Exceeds (67sqm)

- 6.24. Dwellings 1, 3 and 4 are in situ. Dwellings 1 and 3 retain the same amount of existing floorspace and dwelling 4 benefits from an increase in floorspace.

- 6.25. Dwelling 2 is relocated to the front of the building and is positioned over two floor levels. Dwelling 2 marginally falls short of the nationally described space standard for a duplex (3sqm) but exceeds the space standards set out in section 4.14 of Camden's Planning Guidance for 2 persons (48sqm). Dwelling 2 will benefit from generous opening and good outlook to Tottenham Court Road at both first and second floor level as well as improved services including cycle storage. On balance, this dwelling is considered to provide a good level of internal amenity for future occupiers.
- 6.26. Dwelling 5 exceeds the nationally described space standards by 67sqm. This complies with Policy DP26.
- 6.27. Dwellings 1, 3, 4 and 5 benefit from front and rear outlook. Dwelling 2 (1 bedroom) benefits from front outlook at both the first and second floors. All dwellings benefit from windows to all habitable rooms. This ensures an appropriate level of internal amenity for future residents in line with Policy DP26.
- 6.28. Residential cycle and refuse storage space is provided at basement level with the capacity to accommodate 10 bikes in compliance with Policy DP26.
- 6.29. Dwelling 5 (family sized) is provided with private outdoor space in the form of front and rear terraces. The dwellings on the lower floors (including the existing dwellings) are unable to be provided with private outdoor space given the constraints of the existing building. It would be inappropriate to provide external terraces or balconies as these would lead to amenity and/or design issues. Despite this, future residents will have access to high quality public open spaces within a reasonable distance from the application site. The site is approximately 850m from Regents Park which is situated to the north west. This amenity provision is considered to accord with Policy DP26.

Design & Heritage

- 6.30. Policy CS14 of the Core Strategy states that 'the Council will ensure that Camden's places and building are attractive, safe and easy to use by a) requiring development of the highest standard of design that respects local context and character, and b) preserving and enhancing Camden's rich and diverse heritage assets and their settings'.
- 6.31. Policy DP24 of the Development Policies requires developments, including extensions and alterations, to be of the highest standard of design, considering character, form and scale of neighbouring buildings; character and proportions of the existing building; quality of materials; provision of visually interesting frontages; services, natural features, landscaping, amenity space and accessibility.
- 6.32. Policy DP25 of the Development Policies addresses the character of Camden's Conservation Areas and states that Council will take account of conservation area statements, and will only permit development which preserves and enhances the character and appearance of the area.
- 6.33. Policy DP27 of the Development Policies requires development to protect the quality of life of occupiers and neighbours by only granting permission for development which does not cause harm to amenity. The following will be considered visual privacy and overlooking, overshadowing and outlook, sunlight and daylight, noise and vibration, odour and fumes, microclimate and attenuation measures. Developments will have to provide an acceptable standard of accommodation, facilities for the storage and disposal of waste, bicycle storage facilities and outdoor amenity space.

- 6.34. The design of the proposed extensions and alterations at 51 and 52 Tottenham Court Road has been carefully developed through contextual consideration. The design has developed over time following previous planning application and appeal outcomes.
- 6.35. The appeal decision issued in 2012 related to 51 Tottenham Court Road only, and it was dismissed on the grounds that its alteration and increase in height would create an imbalance with the buildings which immediately adjoin it. Whilst its would be in line with the height of the neighbouring property at 49 Tottenham Court Road, it would have exceeded the height of no. 52, thus altering the historical balance between the two buildings.
- 6.36. This application relates to both 51 and 52 Tottenham Court Road, and is materially different from that previously dismissed on appeal. One of the key benefits of bringing forward both buildings together is the ability to design a scheme which respects the existing undulating character of the roofline of the terrace.

51 Tottenham Court Road: Proposed Extensions

- 6.37. The existing mansard roof will be removed and will be replicated at fourth floor level. At the third floor level, a new sheer storey will be formed to match the first and second floor levels. As with the existing building, a strong parapet line will be formed by the penultimate storey, with the mansard set back behind the parapet.
- 6.38. To the rear, the building has been extended in an ad hoc way and comprises a series of poor quality extensions including a timber shed like extension at the first floor level. It is proposed to demolish the later additions and replace them with a more comprehensive extension which is set to the rear of both 51 and 52 Tottenham Court Road.



Image above: 51 & 52 Tottenham Court Road – existing rear

52 Tottenham Court Road: Proposed Extensions

- 6.39. The proposal involves the erection of an additional storey, which will be setback from Tottenham Court Road behind a parapet and roof level balustrade. The existing parapet level will be maintained, which lines through with 53 and 54 Tottenham Court Road. The roof level extension will wrap around to the rear of no. 51, with set backs provided on the third and fourth levels.

- 6.40. At the rear, much like 51 Tottenham Court Road, the existing building is much altered, having been extended at the ground, first and second floor level in a piecemeal way. It has also been fitted with modern windows. It is proposed to demolish the later additions and replace them with a more comprehensive extension which is set to the rear of both 51 and 52 Tottenham Court Road.



Image above: 51 & 52 Tottenham Court Road – existing



Image above: 51 & 52 Tottenham Court Road – proposed

- 6.41. The extensions seek to make more efficient use of the site, particularly towards the rear where the existing extensions make for awkward internal layouts. The proposed scheme will create usable internal floorplates for both the commercial and residential uses. To the rear, the proposed extensions also seek to substantially improve the appearance of the building through replacing a series of poor and mismatched extensions with a new comprehensive scheme which will be appropriately detailed.
- 6.42. The Design and Access Statement (DAS) prepared by Squire and Partner clearly sets out the design evolution and explores principles including townscape and heritage, variety in townscape and urban grain.
- 6.43. The detailed Heritage Assessment has prepared by Peter Stewart Consultancy, considers the significance of the designated heritage assets and the contribution of the host properties to the conservation area. The Heritage Assessment also details the impact of the proposal on the conservation area.
- 6.44. Both documents are integral in determining the appropriateness of the development in terms of design and heritage; and are commonly referred to throughout this section.

(a) Roof Level Extensions

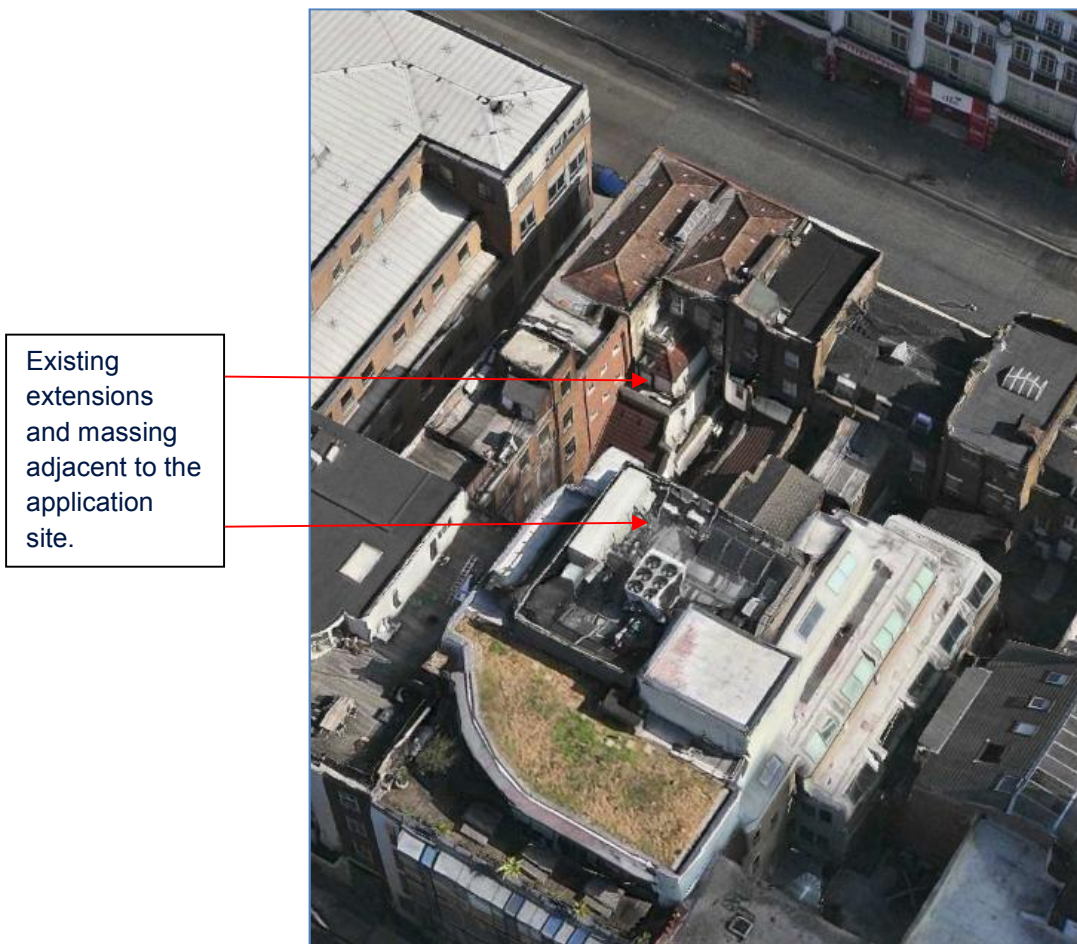
- 6.45. At the roof level, it is proposed to extend both properties by one storey in height. This will be done in two different ways, in order to reflect the differing characteristics of each building. At 51 Tottenham Court Road, the additional storey will take the form of a mansard roof extension, with a third floor sheer storey added in order to retain the existing proportions of the building. The raising of the mansard roof enables the main stucco fronted section of the building to be the most dominant element, with the mansard roof level appearing as a subservient storey. The extensions have been detailed to match the appearance of the existing building i.e. incorporation of matching sash windows at the third floor and dormer windows at the roof level. As the images on the preceding page demonstrates, the mansard roof extension will remain subservient to the more elaborate art deco building at no. 49, and will not compete with its detailed front façade and gable roof. A strong parapet line is retained, and this will sit below the parapet height of no. 52 in order to respect the existing differing heights along this section of the terrace.
- 6.46. At 52 Tottenham Court Road, the additional storey has been designed as set back contemporary addition to the host property. Unlike no. 51, this building does not have an existing mansard roof, and terminates at the existing flat parapet line as per its neighbours at 53 and 54. The design intention is therefore to introduce a more contemporary addition which would differentiate itself from the main building and which could be substantially set back from the front façade.
- 6.47. Turning to the previous appeal decision, as set out earlier this relates to 51 Tottenham Court Road only. The current proposals are materially different in that they bring forward both no. 51 and 52 and address the primary concerns raised by the Inspector. By extending both properties, the existing rhythm of the wider terrace is maintained. The retention of the parapet line to no. 52 enables the building to remain harmonious with its neighbours at 53 and 54 Tottenham Court Road. As per the existing arrangement, it will also remain set above the height of the parapet to 51 Tottenham Court Road.

6.48. The extensions to 51 Tottenham Court Road are subservient to both no. 49 and to 52, and the mansard roof extension will be set below the height of both its neighbours. As considered in detail in the accompanying Heritage Assessment, the design approach maintains the overall variety of the terrace, which is one of the intrinsic characteristics of the Conservation Area.

(b) Rear Extensions

6.49. To the rear it is proposed to demolish a series of unsympathetic extensions and to replace them with a more coherent development. The extensions to the rear of 51 Tottenham Court Road are particularly poor in their quality, and whilst not readily visible from any public view points, they appear cluttered and unsympathetic in views from the immediately adjoining buildings.

6.50. Redeveloping the rear of the site is a substantial improvement, not only in terms of the design and appearance of the extended sections of the building but also in the way that the building functions.



6.51. The additional massing proposed is considered to be acceptable in the context of the immediate built form of development, with a number of buildings having been extended or redeveloped in the recent past (not least the commercial scheme to the rear). The proposed massing steps away from 49 Tottenham Court Road in order to respect the existing rear outlook of this property and so as not to create an issues of sense of enclosure. To the rear of 52 Tottenham Court Road, the extensions at the upper floor level are not out of keeping with the existing extensions to the north and west of the application site.

Heritage significance

- 6.52. The Council's Appraisal relating to the Charlotte Street Conservation Area notes that the area's special character *'derives from the densely developed grid pattern of streets and limited open space of terraced townhouse typical of Georgian London.'*
- 6.53. In relation to Tottenham Court Road the Council's Appraisal states *'Tottenham Court Road is notable for the variety of heights, building styles and materials along the frontage. The prevailing height is three and four storeys with a general pattern of vertically proportioned buildings on narrow plots and a well-defined parapet at roof level...There are a range of materials including yellow and red brick, render and stone.'*
- 6.54. The Heritage Assessment considers the townscape of the area – *'Tottenham Court Road... is not a street of uniform character or cohesive character, nor is it read in a wider townscape of such development. The street frontage of Tottenham Court Road in the Charlotte Street Conservation Area is varied (in terms of the age, scale, height and detailed design of buildings) and forms part of a wider townscape which has a rich and varied character.'*
- 6.55. 51 Tottenham Court Road comprises three storey brick built double fronted former townhouse with a mansard roof. There is a piecemeal mix of poor quality extension to the rear. In relation to 51 Tottenham Court Road the Heritage Statement considers that *'the facade to Tottenham Court Road with a retail use at ground floor level (albeit with a modern poor quality shopfront) that is of most interest, as part of the built edge to the street.'*
- 6.56. 52 Tottenham Court Road is a 4 storey high brick building, two windows wide. As with 51, there is a piecemeal extension to the rear. In relation to 52 Tottenham Court Road the Heritage Statement considers that the building is *'unremarkable architecturally and contribute little of interest to the local townscape... it stands as a building of little quality.'*
- 6.57. In considering both buildings the Assessment concludes *'it is the retail ground floor use, grain of the facade widths and principal facade of 51 Tottenham Court Road that contribute to the character of the Conservation Area.'*
- 6.58. The Assessment notes that the buildings currently provide poor quality shop fronts and accommodation. It also notes that there are other buildings within the area which contribute more positively to the townscape along Tottenham Court Road.

Impact of the proposal on the Heritage Assets

- 6.59. When considering the heritage significance of the Conservation Area and existing buildings, it is considered that both buildings are capable of supporting one additional well designed storey to Tottenham Court Road and the proposed extensions to the rear of the existing buildings.
- 6.60. The proposal will retain and enhance the building elements which contribute to the significance of the Conservation Area including the principle facade, distinction between 51 and 52 Tottenham Court Road at the upper levels, and detailed design of the shopfront at ground floor level.
- 6.61. The extension to 51 Tottenham Court Road is reflective of the existing building's heritage value. The design rationale is to retain the character of the existing building by replicating the mansard roof form at the fourth floor level and repeating the rendered finish of the main body of the building at the third floor level.

- 6.62. On the basis of the building's heritage significance, the extension to 52 Tottenham Court Road will adopt a more contemporary approach and will be set back from the street. It will complement the pitched roofs of 53 and 54 Tottenham Court Road to the north.
- 6.63. Many of the buildings along this part of Tottenham Court Road have been subject to increases in height of at least one storey. This is shown in section 3.1 of the DAS which illustrates the building heights from 47 to 65 Tottenham Court Road in 1838-40, as existing and as proposed. The Council's Appraisal recognises this type of ongoing change and identifies that this change forms part of the character of the Conservation Area.



Fig: 3.4 John Tallis Elevation of Tottenham Court Road 1838-40 - Red line indicates building parapet heights; dotted line indicates mansard roof heights - Proposed nos. 51 - 52

Image – illustration showing building heights in 1838-40 and current building parapet and mansard heights. Many of the buildings from 47 to 65 Tottenham Court Road have been subject to increases in height.

- 6.64. While increasing the height of the existing buildings, the proposal will maintain the existing variety in building heights along this part of Tottenham Court Road. Section 3.2 of the DAS includes illustrations which show the existing and proposed building heights. This is particularly important given that *'it is the variety and not the specific relationships that are important'* as outlined in the Heritage Assessment.' The proposed extension will also maintain the existing relationship between 51 and 52, whereby the latter steps up from its neighbour.



Image – proposed front elevation showing that a variety in building heights will be maintained from 47 to 65 Tottenham Court Road.

- 6.65. The additional floors will not be particularly visible or prominent in views.

- 6.66. The changes to the rear of the buildings will not affect the street frontage, any public views or any view which contributes to the significance of the conservation area. The rear extensions will reflect the existing plot widths and will largely improve the appearance of the building from the rear. The extensions to the rear will ensure that each building remains individually discernible, with varied roof expressions.
- 6.67. The proposal will provide heritage benefits including the improvements to the quality and legibility of the rear building components, improvement to the shop fronts which are particularly important to the character and appearance of Tottenham Court Road and the Conservation Area, and the replacement of windows to Tottenham Court Road which will vastly improve the overall appearance of the building.
- 6.68. The conclusions of the Heritage Assessment are noted as follows –
- *‘The street frontage to Tottenham Court Road is retained and enhanced.’*
 - *‘The project will deliver significantly improved accommodation on the site.’*
 - *‘The upward extension of nos. 51 and 52 will maintain the varied height of buildings seen along Tottenham Court Road, and the extension to the rear is appropriate to its context.’*
 - *‘The Proposed Development will enhance the quality of the townscape of the area and the character and appearance and significance of the Charlotte Street Conservation Area. It will not harm the setting of any heritage asset. In respect of design and built heritage considerations, it is in line with the policies and guidance on design set out in the NPPF and PPG; London Plan policies 7.7, 7.6, 7.7 and 7.8; local policies CS14, DP24 and DP25 and SPDs.’*

Amenity

- 6.69. Policy DP26 of Camden’s Development Management Policies sets out that development will only be permitted where it does not cause harm to amenity. Consideration must be given to privacy and overlooking, overshadowing and outlook, sunlight and daylight, noise and vibration, odour, fumes and dust, dust and attenuation measures.
- 6.70. Policy DP28 of Camden’s Development Management Policies seeks to ensure that noise and vibration is appropriately managed. Planning permission will not be granted for development likely to generate noise pollution or development sensitive to noise in locations with noise pollution.
- 6.71. To the rear of the building, there are a series of commercial buildings including 12-14 Whitfield Street, 6-10 Whitfield Street and 8-9 Kirkman Place. As such, there are no amenity concerns in terms of privacy, overlooking and outlook.
- 6.72. The buildings on either side of 51 and 52 Tottenham Court Road do not contain openings to the common boundary or any habitable spaces at roof level which could be affected by the proposal in terms of privacy, overlooking and outlook.
- 6.73. A sunlight and daylight assessment has been carried out by Rights of Light Consulting which assesses the scheme against the BRE requirements. The assessment concludes –

- All main habitable room windows pass the VSC test; the scheme complies with BRE daylight requirements.
- All main habitable room windows within 90 degrees of south pass both the total annual sunlight hours test and the winter sunlight hours test; the scheme complies with BRE sunlight requirements.
- The proposed development satisfies the BRE overshadowing to gardens and open space requirements.

6.74. As such, there are no concerns in relation to sunlight and daylight, or overshadowing.

6.75. It is not expected that the proposal will result in increased noise or disturbance impacts to adjoining properties as the proposal involves a sensitive increase in the existing land uses only.

6.76. An environmental noise survey and plant noise criteria has been carried out by Applied Acoustic Design which establishes existing levels of background noise affecting the closest third party properties. This establishes current plant noise so that new plant can be assessed appropriately.

6.77. It is not expected that the proposal will result in odour, fumes and dust as the proposal comprises retail, office and residential uses only.

6.78. An air quality assessment has been carried out by Aether which assesses whether there will be an exceedence of air quality objectives for particulate matter or nitrogen dioxide at the proposed site and whether action is required. This primarily relates to the emissions from road traffic and the potential exposure of residents to emissions. The assessment concludes –

- Given the annual mean emission levels, it is recommended that mechanical ventilation is installed, with inlets located at the rear of the building at roof level to circulate air to all dwellings.
- The proposal is considered to be compliant with London's 'air quality neutral' guidance for buildings.

Access, Cycle Parking and Refuse

6.79. Policy CS11 of the Core Strategy encourages development to deliver transport infrastructure and sustainable transport choices to support Camden's growth, reduce environmental impacts and relieve pressure on the Borough's network.

6.80. Policy CS18 of the Core Strategy requires development to reduce the amount of waste produced and to provide for the storage and collection of waste.

- 6.81. Policy DP17 of Camden's Development Management Policies sets out that the Council will promote walking, cycling and public transport use. Policy DP18 of Camden's Development Management Policies sets out that the Council will seek to ensure that developments provide the minimum necessary car parking provision. Development should be car free in the Central London Area. Minimum standards for cycle parking will be met by development – cycle storage for shops and business is applicable where developments provide 500sqm or more of floorspace. Cycle storage for residential dwellings is required at a rate of 1 space per dwelling.
- 6.82. Policy DP29 of Camden's Development Management Policies requires development to promote fair access and remove barriers that prevent people from accessing facilities and opportunities.
- 6.83. The proposal includes the provision of a separate residential and commercial/retail cycle and refuse storage room at basement level. Space for 6 bicycles is provided for the commercial/retail floorspace and space for 10 bicycles is provided for the residential floorspace. This complies with the minimum requirements as set by Camden's Development Management Policies.

Sustainability

- 6.84. Sustainability and energy provisions are set out in the London Plan, the Core Strategy and Development Management Policies. Policy 5.2 of the London Plan sets out that developments must minimise carbon dioxide emissions in accordance with the energy hierarchy – be lean, clean and green. Residential and non-residential buildings must meet a 35% reduction in carbon dioxide emissions (Part L 2013 Building regulations). Policy 5.3 of the London Plan sets out that developments must achieve the highest standards of sustainable design and construction. Policy 5.7 of the London Plan seeks to increase the proportion of energy generated from renewable sources and requires major development proposals to use on-site renewable energy sources.
- 6.85. Policy CS13 of the Core Strategy requires development to take measures to minimise the effects of climate change and requires the highest feasible environmental standards to be met. Development should minimise car usage, promote the efficient use of land, minimise carbon emissions; consider local energy generation, use water efficiently and minimise the potential for surface water flooding.
- 6.86. Policy DP22 of the Development Management Policies requires development to incorporate sustainable design and construction measures. Developments of 500sqm of residential are expected to achieve 'excellent' in Eco Homes assessment from 2013; non-domestic development of a minimum of 500sqm of floorspace is expected to achieve 'very good' in BREEAM assessments from 2016.
- 6.87. CPG3 requires development to incorporate renewable energy technology which target a 20% reduction in carbon dioxide emissions and requires developments to utilise sustainable materials. The BREEAM tool will be used to assess sustainability.
- 6.88. A detailed Energy and Sustainability Assessment has been prepared by MecServe which outlines the environmental performance of the proposal and demonstrates how targets for carbon dioxide emissions reduction are to be met.
- 6.89. In relation to the London Plan, the Energy and Sustainable Assessment concludes –

- The development will achieve a 35.6% reduction in carbon dioxide emissions.
- The retail and office component of the development will achieve 'Very Good' according to BREEAM for Non-Domestic Refurbishment and Fit-Out.
- There is no existing heat and energy network in the vicinity of the site and the site does not fall into a decentralised potential opportunity area.
- It is unfeasible for the development to link to a future heat and energy network in the vicinity, given the intermittent and limited heating demand from non-domestic units and small number of domestic units.
- The development will incorporate 13 high-efficiency photovoltaic panels with a peak electricity generation of approximately 4.16kW.
- The residential component of the development complies with Part L of the Building Regulations in relation to solar gain; the overheating risk is classified as 'none' or 'slight.'
- Given the retention and constraints of the existing building, there are limited opportunities to provide green infrastructure on the site. The balcony spaces at upper levels will provide some opportunities for potted plants to be introduced.
- The site is not at risk of flooding.
- The proposal does not increase non-permeable areas and therefore, it is unlikely that there will be a negative impact on rainwater runoff. Given the retention and constraints of the existing building, there are limited opportunities to store rain water or introduce attenuation measures.
- The residential component of the development has been designed to meet a target of 105 litres or less per head per day. The development will be fitted with water efficient fittings.

6.90. In relation to Camden's 'Development Plan,' the Energy and Sustainable Assessment concludes –

- No car parking is available on site and occupants will be encouraged to travel by public transport or bike. Cycle storage is provided for both the residential and non-residential components of the development at basement level.
- The development will achieve a 35.6% reduction in carbon emissions.
- The development will incorporate 13 high-efficiency photovoltaic panels with a peak electricity generation of approximately 4.16kW.The
- The renewable technologies (photovoltaic panels and air source heat pumps) will achieve a carbon reduction in excess of 11.4%. The development is unable to meet the 20% target reduction; this is due to the relatively small scale of the development and the restriction imposed by the existing building being set in a dense surrounding.
- The development will be fitted with water efficient fittings.

- The retail and office component of the development will achieve ‘Very Good’ according to BREEAM for Non-Domestic Refurbishment and Fit-Out. A BREEAM pre-assessment has been prepared to accompany the Energy and Sustainable Assessment.
 - The majority of the existing structure will be retained and reused.
- 6.91. While the scheme cannot achieve ‘Excellent’ according to BREEAM for Non-Domestic Refurbishment and Fit-Out, it shows a notable commitment to achieving the provisions set out in the London Plan and Council’s energy policies. As previously set out, the development will achieve a 35.6% reduction in carbon dioxide emissions; will incorporate 13 high-efficiency photovoltaic panels with a peak electricity generation of approximately 4.16kW.
- 6.92. It should be noted that it is difficult to fully comply with the provisions given that the scheme involves alterations and extensions to the existing building only which limits the ability to incorporate measures such as a green roof and the compliant provision of renewable technologies.

Air Quality

- 6.93. Policy DM32 of the Development Management Policies sets out that air quality assessments will be required where development could potentially cause significant harm to air quality. Mitigation measures will be expected in developments that are located in areas of poor air quality.
- 6.94. A detailed Air Quality assessment has been carried out by Aether to assess the impact of the proposal on local air quality and assess the potential exposure of residents to pollutants.
- 6.95. The Air Quality assessment concludes –
- No car parking is provided on site and the development does not involve on-site energy generation. As such, the proposal will not cause a significant worsening of air quality in the area via the increase in emissions.
 - The annual NO₂ concentrations are above the objective in the worst case scenario at all receptor locations. As such, it is recommended that mechanical ventilation be installed with inlets located at the rear of the building at roof level, and air circulated to all residential dwellings.
 - Appropriate measures should be taken to minimise the impact of the construction phase on local air quality.
 - The development is compliant with London’s ‘air quality neutral’ guidance for buildings.

Construction Impacts

- 6.96. A Construction Management Plan (CMP) has been prepared by M.E.F. Construction Services to outline the construction approach to the demolition and re-construction components of the proposal. It also sets out manage strategies to reduce the impact of the construction works on adjacent businesses and residents. The CMP addresses – construction programme; construction management action plan including communication, site access, working hours, fire and emergency procedures, security, health and safety, scaffolding; environmental issues including waste management, dust, noise and vibration and method statement.
- 6.97. A Construction Traffic Management and Access Plan (CTMP) has been prepared by M.E.F. Construction Services to outline how construction traffic will be managed during the demolition and re-construction components of the proposal. The CTMP addresses – delivery routes, delivery rules, loading strategy, programme of works, monitoring and risk assessment.

Subterranean Development

- 6.98. Policy DP27 of the Development Management Policies sets out that basement development should be assessed to determine it's impact on drainage, flooding, groundwater conditions and structural stability. Basement development will only be appropriate where it does not cause harm to the built and natural environment, and local amenity. Consideration will be given to – structural stability of neighbouring properties, drainage and water environment, amenity of neighbours, open space and trees, landscaping, appearance or setting of the property, and archaeological remains.
- 6.99. A Basement Impact Assessment (BIA) was carried out by Ellis and Moore to assess the impact of the proposed basement at the application site. The BIA assesses the proposed basement within the context of stages including – screening, scoping, site investigation and study, and impact assessment.
- 6.100. In relation to Policy DP27 and CPG4, the screening stage of the BIA concludes –
- There are no matters of concern relating Ground Water;
 - There are only three matters of concern relating to Slope and Stability including highways, depth of foundations relative to neighbouring properties and railway/underground tunnels. These are considered within the scoping stage.
 - There are no matters of concern relating to Surface Flow and Flooding.
- 6.101. In relation to Policy DP27 and CPG4, the scoping stage of the BIA addresses the three matters identified as 'of concern' relating to Slope and Stability. The BIA provides recommendations for each matter including –
- The applicant is required to apply to Camden Highways for approval in principle for construction of a structure abutting a highway.
 - A structural monitoring regime will be required to protect neighbouring properties as the basement will extend 0.9m below the adjoining properties. Detailed design and method statements will be required for both underpinning and structural works.

- Given their positioning, the tunnels are unlikely to be impacted (subject to the approval in principle from Camden Highways).

6.102. In relation to Policy DP27 and CPG4, the site investigation and study stage of the BIA sets out the methods undertaken to establish the site conditions including initial desktop study and limited intrusive field investigation. The results of the analysis are set out in the accompanying Site Investigation Report prepared by Ground Engineering.

6.103. In relation to Policy DP27 and CPG4, the impact assessment stage of the BIA describes and quantifies the effects of the development on the surrounding environment and explains the mitigation measures that will be required during construction. The BIA concludes –

- The development will have no impact on the local natural or built environment and will only have limited temporary impact on the local amenities for a temporary period whilst the works are in operation.
- The proposed site development will not result in an increased risk of local flooding or lead to any ground instability.

7. Conclusions

7.1. This planning application proposes the following development at 51 and 52 Tottenham Court Road, London, W1T 2EH –

Extension and refurbishment of the existing buildings at 51 and 52 Tottenham Court Road to provide a five storey (ground to fourth floor), plus basement mixed use retail, office and residential development.

7.2. The proposal has been brought forward as the site offers scope to provide –

- better quality retail floorspace within a Central London Frontage;
- additional high quality and flexible office floorspace within a highly accessible Central London location;
- increased and better quality residential floorspace than existing on site.

7.3. This planning application follows pre-application discussions with the London Borough of Camden and a formal response which raises no objections to the demolition of existing rear extensions, amalgamation of retail units, the principle of providing increased office and residential floorspace and the quality of retail, office and residential floorspace proposed.

7.4. In response to the Council's pre-application advice, further investigation and analysis of the existing building and surrounding area has been carried out. As such, this planning application is supported by a Design and Access Statement prepared by Squire and Partners which sets out the contextual approach to the design, and a Heritage Statement prepared by Peter Stewart Consultancy which sets out the heritage significance of the existing building and surrounding area, and establishes the likely impact of the proposal on the relevant heritage assets.

7.5. The revised proposal has been considered in relation to, and is deemed to comply with, national and local planning policy including –

- The NPPF;
- Camden's 'Development Plan' which comprises the Core Strategy and the Development Policies 2010.
- Camden's Charlotte Street Conservation Area Appraisal and Management Plan (2008) and Camden Planning Guidance Documents.

7.6. The proposal results in a high quality development, which provides significant benefits in terms of land uses, layout, quality of floorspace, incorporation of renewable technology, cycle and related facilities and storage. We believe that these benefits outweigh any harm that it perceived to be caused by the extension to the rear and front of the buildings.