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15 July 2016

Mr Shane O'Donnell
Planning Department
London Borough of Camden
2nd Floor
5 Pancras Square
C/O Town Hall
Judd Street
London
WC1H 9JE

Dear Mr O'Donnell

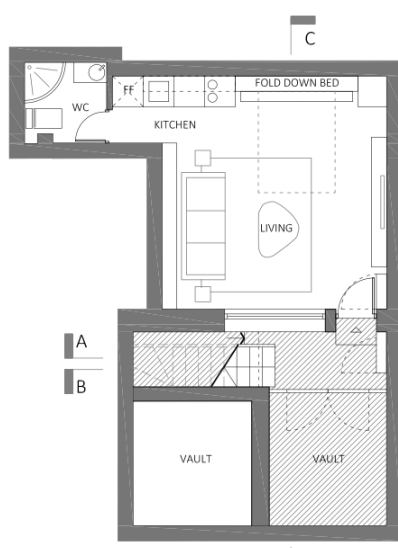
CAMDEN: 122 DRUMMOND STREET

1. Please find enclosed a planning application which seeks consent for a change of use at basement level only from class A1 retail to short let accommodation at 122 Drummond Street (use class C1).
2. The application comprises the following:
 - A copy of the planning application form,
 - An Os site location plan,
 - Existing plans and elevations,
 - A cheque for £385 being the appropriate application fee.
3. The proposal has been the subject of pre-application advice with the Council. A copy of the pre-application advice note ref. 2016/2070/PRE can be found at **Annex 1**.

General Location

4. The site is west of Euston Station within the Drummond Street Neighbourhood Centre and Euston Growth Area. The surrounding area is in mixed uses, including hotel, residential, retail, offices and leisure.
5. It is not within a conservation area and there are no other heritage assets material to the decision.

8. From 1982 until 2010 the ground floor was a butcher and grocery shop called 'London Oriental Foods.' The basement was used for the storage of meat and food items. The property was then vacant until October 2013.
9. Internal works to convert the basement into a flat were later completed without planning permission but the basement has never been used as a residential unit.
10. The Council consider the current lawful use of the site as retail and under previous decisions, 2016/0200/P and 2014/5443/P, the conversion of the unit into permanent residential use has been resisted.
11. The Council helpfully accepts the loss of a retail use at this basement level would not have an adverse impact on the retail function and viability of the surrounding neighbourhood and a change of use from retail is possible given an appropriate alternative use is provided.



The Proposal

12. The proposal involves the short term letting of the basement for less than 90 consecutive nights exceeding 90 nights in the same calendar year.
13. No physical changes are required to the building. It is already capable of being put to the proposed use without any physical adaption.
14. The short stay will use a hotel-style booking system similar to renting an apartment other than having no fixed-term contract. Consistent with the Greater London (General Powers) Act 1973 length of stay is restricted to up to 90 days but can be a little as a few days.

Planning Policy

Camden Core Strategy 2010-2015

15. Core Strategy Policy CS1 (Distribution of growth Overall approach to growth and development) indicates an intention to promote a) a concentration of development in the growth areas of ...Euston, ...

16. Para 1.11 highlights King's Cross, Euston, Tottenham Court Road, Holborn and West Hampstead Interchange will be the locations for the largest amount of Camden's future growth.
17. Para 1.12 recognises redevelopment at Euston and around Tottenham Court Road will provide substantial numbers of jobs and homes, as well as other uses and facilities.

Camden Development Policies (Adopted 2010)

18. Development Policy DP2 states that: *"Proposals for new short-term and temporary accommodation will be considered taking into account policies that seek to protect existing uses. Where a proposal involves accommodation for short-term visitors to Camden, the Council will take account policy DP14 relating to tourism development and visitor accommodation"*.
19. Development Policy DP14 states that: *"All tourism development and visitor accommodation must:*
d) be easily reached by public transport;
e) Provide any necessary off-highway pickup and set down points for taxis and coaches;
f) not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems"

Planning Issues

20. The proposed short term accommodation for 90 days or less would be easily reached by public transport. Given the size of the unit it is unlikely that a high demand of taxis and coaches will be created.
21. Similarly, the scale of this short term let will not disturb neighbours. It is a small unit and will not create noise at unsociable hours or reduce the sense of community nor raise the fear of crime.
22. If the unit is rented for a weekend only, the occupier would be travelling relatively light and there is no reason why comings and goings should differ significantly from those of permanent residents. It is unlikely that the room would be occupied for a shorter period; even if it was, there is nothing to suggest unusually high comings and goings compared with permanent dwellings. If the room was being occupied for longer periods, arrival and departure, which is primarily when potentially noisy activity would take place, would be well spread out and highly unlikely to cause any significant noise or disturbance; and, again, there is no obvious reason why daily comings and goings should differ noticeably from those of permanent residents.
23. There is no risk of future intensification as the unit is only capable of accommodating 1 bed. In any event, the applicant would accept a condition restricting the number of persons.
24. The land use survey at **Annex 2** demonstrates the proposed short term accommodation use would not be out of character with the wide mix of uses in the area.
25. I look forward to discussing the application with the allocated Case Officer in due course.

Yours sincerely

Emma McBurney
Michael Burroughs Associates

Annex 1

Development Management Regeneration and Planning

Culture & environment directorate
London Borough of Camden
Town Hall
Argyle Street
London
WC1H 8EQ
Tel: 020 7974 2944
shane.o'donnell@camden.gov.uk
www.camden.gov.uk/planning
Email: Emma@mbaplaning.com

Dear Ms Emma McBurney

Town and Country Planning Act 1990 (as amended)

Re: 122 Drummond Street, London, NW1 2HN.

Thank you for your enquiry received on the 11th of April 2016, regarding:

Proposed change of use of the basement level of a Shop (Class A1) to either short stay accommodation, medical consulting room or office.

This letter 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.

Site Description

This pre-application advice relates to the basement unit of 122 Drummond Street. There is extensive planning history on this site, some of which is listed below. For the purposes of this advice, the existing use of this basement unit will be retail (A1). The application unit is a single room with bathroom located off it and the unit is connected to the street by a stairwell. The internal space of the unit is approximately 23 m² and there is single source of natural light provided by the front lightwell. The unit above at ground level is currently operating as a Travel Agent (A1). The surrounding area is a mix of commercial and residential elements. There are more active uses such as restaurants and retail units in the immediate vicinity as well as examples of office use at ground floor level.

Relevant History

2016/0200/P- GPDO Prior Approval- Proposed Change of Use of the basement level of a Shop (Class A1) to a Class C3 (Dwellinghouse).

Refused 18/03/2016.

2014/5443/P - Part retrospective planning permission for the change of use of basement from A1(shop) to 1x one bed self-contained flat (C3) and proposed alterations to the external pavement vault form a bedroom.

Refused 08/01/2015

Appeal Dismissed 13/11/2015

Policies

The most relevant local policies are listed below:

Camden Core Strategy 2010-2015:

CS1 (Distribution of growth)

CS5 (Managing the impact of growth and development)

CS7 (Promoting Camden's Centres and shops)

CS10 (Supporting community facilities and services)

CS11 (Promoting sustainable and efficient travel)

CS14 (Promoting high quality places and conserving our heritage)

Camden Development Policies (Adopted 2010):

DP10 (Helping promote small and independent shops)

DP12 (Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses)

DP14 (Tourism development and visitor accommodation)

DP15 (Community and leisure uses)

DP16 (The transport implications of development)

DP17 (Walking, cycling and public transport)

DP18 (Parking standards and limiting the availability of car parking)

DP19 (Managing the impact of parking)

DP22 (Promoting sustainable design and construction)

DP24 (Securing high quality design)

DP25 (Conserving Camden's heritage)

DP26 (Managing the impact of development on occupiers and neighbours)

DP28 (Noise and vibration)

Camden Planning Guidance

CPG1 (Design)

CPG2 (Housing)

CPG3 (Sustainability)

CPG5 (Town Centres, Retail and Employment)

CPG6 (Amenity)

CPG7 (Transport)

Proposal

The current use is retail (A1) and previous decisions by the Council have ruled out a conversion to residential. 3 Alternative options therefore wish to be explored:

Option 1 -Conversion of existing retail use to short term accommodation.

Option 2 -Conversion of the existing retail use into a medical consultation room.

Option 3 -Conversion of existing retail use into office use.

Principle of the Development

The current use of the site is retail and under previous Council judgements, 2016/0200/P and 2014/5443/P, the conversion of the unit into residential accommodation has been resisted given the standard of accommodation proposed. However, although concerns were raised about the loss of retail floorspace given the basement unit's siting and the remaining active A1 use at ground floor level, it was not considered that the loss of retail floorspace could be resisted. It is also my officer's opinion that the loss of a retail use of this basement unit would not have an adverse impact on the retail function and viability of the surrounding neighbourhood. Hence a change of use from retail is possible given an appropriate alternative use is provided.

Option 1

Option 1 -Conversion of existing retail use to short term accommodation.

Development Policy DP2 states that:

"Proposals for new short-term and temporary accommodation will be considered taking into account policies that seek to protect existing uses. Where a proposal involves accommodation for short-term visitors to Camden, the Council will take account policy DP14 relating to tourism development and visitor accommodation".

Development Policy DP14 states that:

"All tourism development and visitor accommodation must:

d) be easily reached by public transport;

e) Provide any necessary off-highway pickup and set down points for taxis and coaches;

f) not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems"

The proposed short term accommodation for 90 days or less would be easily reached by public transport. Given the size of the unit it is unlikely that a high demand of taxis and coaches will be created. It would need to be demonstrated that the proposed short term accommodation use would not be out of character with the mix of uses in the area having an adverse effect on surrounding uses in the area.

Option 2

The proposal is to convert the basement unit into a Medical Consultation Room

Core Strategy Policy CS16 states that *'The Council will support the provision of additional health care facilities and will work with NHS Camden and other service providers to make sure the borough has a necessary supply and distribution of premises to meet Camden's health care needs'*.

The surrounding uses in the area are mixed and the premises benefit from an independent access. Therefore there is no in principle objection to a D1 use in this location. However given the size of the premises, single access, and lack of parking, the intensity of use on site would need to be limited i.e. a limit placed on the volume of patients received and on staffing levels. The site is highly accessible by public transport with a PTAL score of 6b (excellent) hence the proposed facility would also need to be car free for both employees and patients. More information would thus need to be provided about the intensity of use on site both in terms of staffing, patients, and equipment.

Option 3

The proposal is to convert the existing retail use into an office use.

Development Management Policy DP13 states that *'An increase in the number and diversity of employment opportunities is fundamental to improving the competitiveness of Camden and of London'*.

Paragraph 13.6 of DP 13 states that *'the re-provision of employment floorspace should be able to accommodate a range of business types and sizes (e.g. new businesses, small and medium size enterprises (SMEs) and creative businesses). Applicants must demonstrate to the Council's satisfaction and the commercial element is appropriate to meet the likely needs of the end user. The provision of inappropriate business space (e.g. inappropriate floor to ceiling height or poor access arrangements) will not be acceptable as this often fails to attract an occupier, which can lead to vacancy'*

The relative small size of potential office space would discourage some users from occupying the unit. However, the unit may be suitable for SMEs and creative businesses. The office space would still have a limited floor to ceiling height and poor daylight but would benefit from independent access. The proposed office unit would also be car free given the high accessibility by public transport. It is considered that the proposed office use could be suitable in this location subject to more information being provided about the proposed layout on site.

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Conclusion

It is considered that the proposed (D1) medical use would be appropriate subject to more information being provided regarding the intensity of the use on site. The proposed office use (B1) may be suitable for SMEs and creative businesses subject to more information being provided by the reconfiguration of the layout and facilities available.

The conversion to short term accommodation would need to show that this proposed use is appropriate in the immediate surroundings and that this use would not have an adverse impact on neighbouring uses

How to submit your application

Please submit your application electronically via the national planning portal.

When submitting a planning application, the following information will be required:

- ☐ An appropriate fee
- ☐ Site location plan
- ☐ All existing elevations (including the front and the side), floor plans, roof plans and sections
- ☐ All proposed elevations (including the front and the side), floor plans, roof plans and sections
- ☐ Design and Access Statement

After you submit your application

It would be useful if you could let me know when you have submitted the application along with the planning portal reference number. I will then pick the application up as the case officer.

We are legally required to consult on the application with individuals who may be affected by the proposals. We will notify your neighbours by letter, put up a notice on or near the site and, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

All consultation responses will be available to view on the Council's website using the planning application search page. It is likely that an application of this size would be determined through delegated powers.

I trust the above provides a useful summary; however should you have any queries about the advice contained in this letter please contact Shane O'Donnell on **020 7974 2944**.

Please note that the information contained in this letter represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Management section or to the Council's formal decision.

It is important to us to find out what our customers think about the service we provide. To help, we would be very grateful if you could take a few moments to complete our pre application enquiry survey. We will use the information you give us to monitor and improve our services.

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

Kind Regards,

Shane O'Donnell

Planning Officer

Regeneration and Planning Culture and Environment London Borough of Camden

2nd Floor, 5 Pancras Square

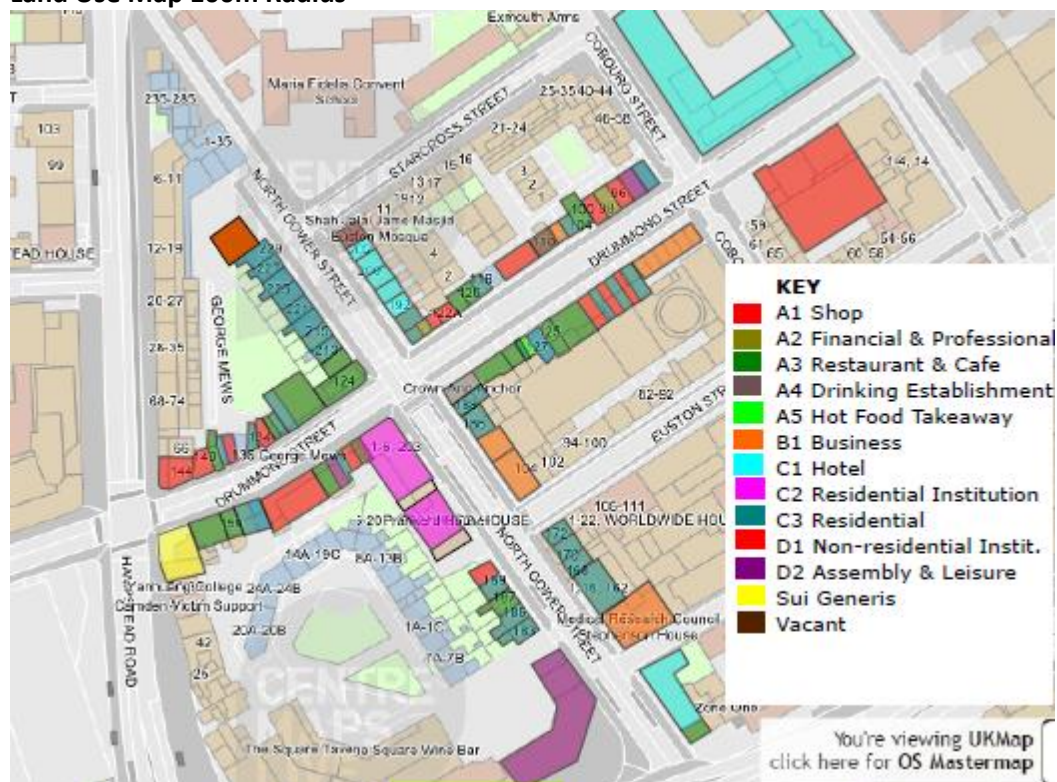
London

N1C 4AG

020 7974 2944

Annex 2

Land Use Map 100m Radius



Unit Address	Use	Use Class
Drummond Street (South)	Rolles Bros PH. Camden's People Theatre	Vacant
161-163	Masala Hut Indian Curry	A3
159	Shah Tandoori	A3
155	Tolmers Square and Fondry Mews	C3
	Falafel Café. Costcutter Local Supermarket	A1
	Boxing Fitness Gym	D2
	Bio Organix Health Store	A1
141-153	Proximity Building Flats 1-14	C3
	Log Nail Spa	A2
Unit E 141-153	Vacant ground floor. Flats above	Vacant
	Regent's University London off Campus Accommodation	C2a
	Crown and Anchor Public House	A4
133-135	Ravi Shankar Indian Vegetarian Restaurant	A3
	Brazzis Italian Coffee shop	A3
129a	Flat	C3
	Simply Chicken	A5
129	Savera Bakery	A1
127	Flat	C3
	Raavi Kebab Halaal Tandoori	A3
121	Diwana Indian. Flats above	A3

	Plentiful Foods Ltd	A1
119a	Flat	C3
	Supermarket Off Licence	A1
	Business	B1
	Colonet Photographic	A1
Drummond Street (north)	Ibis Hotel	C1
60-68	Cobourg Street Flats	C3
92-94	Dharna Shala Ashtanga Yoga	D2
96	I-optix Optician	A1
98	Lavender & Rosemary Clinic Massage	A2
100	Gupta Indian Sweets Savouries	A1
	African Arts and African Kitchen	A3
100-106	Residential	C3
108	One Support Housing Group. Flats 1-6 above.	C3
	Vacant	Vacant
	Ambala The Finest Asian Confectionery	A1
116	Residential	C3
118	Drummond Villa Indian	A3
120	Café Nora	A3
120a	Flat	C3
122	Yamoto	A1
122a	Nicks Salon	A1
	Vape Cloud	A1
	Drummond Money Transfer and Travel Services	A2
124	Chutneys Restaurant Indian	A3
	Taste of India Tandoori Restaurant	A3
128	Flats A-E	C3
	Laska King Chinese Street Food & Takeaway	A5
132a	Flat	C3
	Sizzling Bombay	A3
	Amin Food Store	A1
138	Crescent Dry Cleaners	A1
140	Residential	C3
	Hot Pepper Café	A3
	Looking Good Hair & Beauty	A1
	Greenlight Pharmacy	A1
231 North Gower Street (west)	Jestino and Whiles	B1A
229-213	Residential	C3
211	Restaurant	A3
195-201	Prankerd House UCL Student Flats	C2
	Walls Ice Cream	A1
191-189	Residential	C3
	Speedy Sandwich Bar & Café	A3
187	Flats A-E	C3

183-185	Residential	C3
	UCL, Division of Medicine	D1
North Gower Street (east)	Jikarjika Coffee & Canteen	A3
	Euston Square hotel	C1
158-160	Offices	B1A
162	Flats 1-15	C3
168	Flats	C3
170	Flats	C3
172	Flats	C3
174-180	Hodge Jones & Allen Solicitors	B1A
186-188	Residential	C3
192-200	Studios To Let	C1
202	UK Islamic Mission	D1