

PLANNING STATEMENT

66 & 64 CHARLOTTE STREET & 32 TOTTENHAM STREET
LONDON W1T 4QE

July 2016

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1.0 INTRODUCTION

This Planning Statement has been prepared by **Porta Planning LLP** on behalf of Mr. Roger Lass of Salash Holdings Limited to accompany the submission of **two separate** full planning applications to Camden Council for scheme proposals that require planning permission at no. 66 Charlotte Street, 64 Charlotte Street and 32 Tottenham Street, London W1T 4QE. Both submissions are supported by architectural drawings prepared by **Roland Cowan Architects (RCA)**.

Full details of each aspect of both scheme proposals are set out in **Section 4** below.

The purpose of the statement is:

- To understand the site and its context;
- To explain the principles of the proposal, and of the reasoning and concepts behind them;
- To take into account the significance of the buildings within the conservation area context;
- To show the way in which the proposals have responded to an understanding of the site and its urban context; and
- To demonstrate that an inclusive and integrated approach has been adopted in the formulation of the development that responds to the relevant planning policy framework.



Image 1: Verified CGI View of scheme proposals at 66 and 64 Charlotte Street

2.0 SITE DESCRIPTION & CONTEXT

The application site comprises nos. 64 and 66 Charlotte Street and no. 32 Tottenham Street, and occupies a prominent location at the junction between Charlotte Street and Tottenham Street, within the Charlotte Street Conservation Area and the Fitzrovia Area Action Plan area. Each of the three buildings are 19th century 4-storey unlisted properties, with basements, with no. 64 Charlotte Street also having a mansard extension at roof level.

No. 66 Charlotte Street has a newsagent (A1) at ground floor level, with office (B1) use at basement, first and second floor levels. The third floor of no. 66 comprises a residential unit (C3). The lawful use of no. 64 Charlotte Street comprises B1 floorspace at basement and ground level, with residential (C3) units above and no. 32 Tottenham Street comprises an A3 unit at ground and basement level with residential units (C3) above. In December 2016, planning permission (ref: (2016/3133/P) was granted for the change of use at ground and basement floor levels from Class B1 (office) use to Class A3 (restaurant/cafe) use at 64 Charlotte Street and from Class A3 (restaurant/cafe) use to Class B1 (office) use at 32 Tottenham Street. This permission has not yet been implemented on site.

The character of Charlotte Street is derived from mixed use 4-5 storey Georgian and Victorian townhouses. However, through the years, there are now a number of larger blocks with new or modern development schemes along Charlotte Street, such as the Derwent London schemes at 73-75 Charlotte Street (opposite the application site), the adjoining site at 77-79 Charlotte Street, and the UCL Astor College building (99 Charlotte Street).

The surrounding area is characterised by a mix of uses, with the street level uses mainly comprising of commercial or retail uses, such as shops, cafes, restaurants, and art galleries. Charlotte Street is a busy street with a busy footfall and a range of complimentary uses. Tottenham Street is a slightly quieter thoroughfare between Tottenham Court Road and Charlotte Street.

The corner unit in the adjacent building at no. 60 Charlotte Street, is in restaurant (A3) use (Gaucho), with the other two corner units at no. 73-75 and no. 69 Charlotte Street in office/retail use classes.

The ground floor uses on the immediate part of the terrace block on Charlotte Street, of which the application site adjoins, comprises of a bike shop (A1) at no. 68, a restaurant/bar (A3) at no. 70 and an office (B1) at no. 72. The Tottenham Street terrace comprises of an art gallery (A1) at no. 30, a nail studio (sui generis), a dry cleaner (A1) at no. 26, and an office (B1) at no. 24.



Image 2: Application site with 66 Charlotte Street outlined in red, 64 Charlotte Street outlined in green and 32 Tottenham Street outlined in yellow

3.0 PLANNING HISTORY

In this section, we set out the relevant planning history for each property:

66 Charlotte Street

- In 2011, a certificate of lawfulness (2011/4429/P) was refused for the erection of awning structure with grille (not including cover) and newsstand cupboards adjacent to existing shopfront (Class A1).
- In 2013, an application (2013/6925/NEW) for the installation of replacement canopy awning cover on front elevation of existing shop was withdrawn.
- A certificate of lawfulness (2014/3193/P) was granted in 2014 for the retention of existing security cupboards.

64 Charlotte Street and 32 Tottenham Street

- In 1984, planning permission (ref: 8400018) was granted for the use of the first, second and third floors as art studio, graphic designers, reception, photo-setting, film make-up, exhibition displays, and photographic department and laboratory uses and ancillary office.
- Planning permission (ref: 9101263) was refused for the change of use of ground and basement floors from Use Class B1 (office) to Use Class (A3) restaurant.
- In 1999, planning permission (ref: PS9904367) was granted for the change of use of the basement and ground floor from Use Class B1 (office) to Use Class D1 (non-residential institution).
- Planning permission (ref: PSX0104990) was granted in December 2001 for the retention of the change of use of ground floor and basement from Use Class D1 (non residential institution) to Use Class B1 (office).
- Planning permission (ref: 2012/3537/P) was refused for the erection of extensions at first to third floor level raising of cornice by 240mm, alterations to fenestration, shopfront and addition of railings and stairs to open front lightwell all in connection with change of use from offices (Class B1) and retail (A1) to retail (Class A1) at basement and ground floor level and residential on the first to third floors (1 x 3 bed, 2 x 2-bed and 3 x1-bed) (Class C3). This refusal of planning permission was the subject of an Appeal to the Secretary of State (APP/X5210/A/13/2198369) and the appeal was allowed.
- An application (2014/3932/P) to formally discharge the prior-commencement condition relating to the detailed drawings of the windows, doors, the new shopfront and new lightwell balustrading has been approved and implemented on site.
- On 11th November 2014, planning permission (2014/5073/P) was refused and subsequently dismissed at appeal (APP/X5210/W/14/3001661) for the erection of mansard roof extension and green roof at no. 64 in association with the creation of a new 1 bedroom residential unit (Class C3) (in association with planning permission (2012/3537/P).
- Planning permission (2014/5072/P) was granted on 23rd December 2014 for the replacement of existing butterfly roof with pitched and flat slate roof at no. 64.
- A Certificate of Lawfulness (2014/7777/P) was granted on 14th April 2015 confirming the use of no. 32 Tottenham Street as a restaurant/café (A3).
- Planning permission (2015/6701/P) was refused on 10th March 2016 for the erection of a mansard roof extension at no. 64 to create new 3-bed residential unit. The subsequent appeal (ref: APP/X5210/W/16/3148520) was allowed and permission granted on 25th July 2016.
- Planning permission (2015/7183/P) was granted at no. 32 Tottenham Street on 18th March 2016 for the introduction of new front lightwell with railings and new shopfront to replace existing (retrospective) and associated works.
- More recently, planning permission (2016/3133/P) was granted on 30th December 2016 at 64 Charlotte Street and 32 Tottenham Street for change of use at ground and basement floor

levels from Class B1 (office) use to Class A3 (restaurant/cafe) use at 64 Charlotte Street and from Class A3 (restaurant/cafe) use to Class B1 (office) use at 32 Tottenham Street, involving internal reconfiguration and resizing of units and installation of a replacement kitchen extract system to the rear. This permission has not yet been implemented on site.

4.0 THE PROPOSALS

This section of the Statement seeks to summarise the scheme proposals, for both planning applications. For ease of reference, the two application schemes are referred to throughout this statement as 'Scheme A' and 'Scheme B'.

Scheme A, proposes:

- I. The change of use and reconfiguration of the existing basement and ground floors at no. 64 Charlotte Street (B1) and 32 Tottenham Street (A3) to locate the A3 use on Charlotte Street and the B1 use on Tottenham Street, including replacement plant extract equipment (as consented under 2016/3133/P);
- II. The retention of, and alterations to, the ground floor retail unit (A1) at no. 66, including installation of a front lightwell and new shopfront;
- III. Refurbishment and retention of the existing lower ground floor (B1) at no 66;
- IV. Conversion and extension of existing office accommodation on the first and second floors of no. 66 (B1), and retention of the existing third floor residential use, to provide residential flats (C3), including extension of the closet wing and erection of a mansard roof extension.
- V. Demolition of courtyard office building to the rear of no. 66 and the construction of a new replacement building across a new basement level, ground and first floor levels - to form an extension of office accommodation from no. 64.

Scheme B comprises of the same proposals, except for the inclusion of the mansard roof extension. However, instead of the mansard extension, Scheme B proposes the replacement of the existing roof with no accommodation at roof level.



Image 3: Verified CGI view of scheme proposals to the rear of 66 Charlotte Street

5.0 PLANNING POLICY

5.1 National Planning Policy Framework (DCLG, March 2012)

The National Planning Policy Framework (NPPF) was published on 27th March 2012, and contains the Government's planning policies for England and explains how these are expected to be applied. Section 38 (6) requires that applications for development must be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions.

The Framework is a key output resulting from the Plan for Growth and the Government's proposals to reform the planning system. It sets the planning agenda for supporting and pro-actively driving sustainable economic growth.

The Ministerial Foreword to NPPF states that:

"The purpose of planning is to help sustainable development. Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations. Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world... We must respond to the changes that new technologies offer us. Our lives, and the places in which we live them, can be better, but they will certainly be worse if things stagnate."

Paragraph 9 is also of relevance and states that *"pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):*

- *Replacing poor design with better design;*
- *Improving the conditions in which people live, work, travel and take leisure; and*
- *Widening the choice of high quality homes".*

The Core Principles of the NPPF are found in **paragraph 17**, which advises that within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. Among these 12 principles, are that planning should amongst other matters, *"proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs... taking account of the needs of the residential and business communities."*

Also in **paragraph 17**, one of these core principles states that planning should also *"always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings."*

Paragraph 20 states that to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.

Paragraph 56 confirms that the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

Furthermore, **paragraph 57** states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings.

Paragraph 60 adds that planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

Section 12 of the NPPF provides guidance in relation to conserving and enhancing the historic environment. **Paragraph 128** confirms that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected. The paragraph further adds that explains that the level of detail required need not be exhaustive and that it should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal in question on the significance of the heritage asset in question.

Paragraph 131 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 viability; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness".*

Paragraph 134 states *"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."*

Paragraph 187 advises that local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

5.2 National Planning Policy Guidance

The application has also carefully considered all of the following National Planning Policy Guidance documents, in particular:

- Conserving and enhancing the historic environment;
- Design; and
- Making an application.

5.3 London Plan

Regional planning policy for London is contained within the July 2011 London Plan which sets out planning policy for the capital until 2031, integrating social, economic and environmental policy. The underlying objective is to accommodate London's population and economic growth through sustainable development. The key policies and paragraphs have been set out below.

The London Plan objectives (as set out under **Policy 1.1**) are to ensure London is:

1. A city that meets the challenges of the economic and population growth;
2. An internationally competitive and successful city;
3. A City of diverse, strong, secure and accessible neighbourhoods;
4. A City that delights the senses;
5. A City that becomes a world leader in improving the environment; and
6. A City where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

Paragraph 1.23 of the Plan recognises that without economic growth, the situation would be dire for London.

Paragraph 1.47 identifies that only prudent course is to plan for continued growth. The paragraph continues stating these action plans, set out below, are essential to ensuring the capital remains a safe and attractive place to live in and to do business:

- **A growing and ever changing economy** by promoting and supporting innovation and ensure there are policies in place that allow them the space to grow in places meeting their needs.
- **Making real progress in addressing climate change**, in making sure buildings and the public realm are designed with climate change in mind, and reducing our emissions. Development can be managed to help this - designing buildings to be energy efficient, promoting decentralised and renewable energy and patterns of development that reduce the need to travel by less environmentally friendly modes of transport.
- **Improving quality of life for all Londoners and all of London** – enabling growth and change, while also supporting the retention of London’s heritage and distinctiveness, and making living here a better and more enriching experience for all.

Paragraph 1.49 supports and recognises the **importance of improving and modernising the capitals building stock and private investment in the built environment**, and states, *“In looking at how these challenges are to be met, it is important to remember that the private sector dominates London’s economy, accounting for 84 per cent of output and employment. Achieving all the environmental, economic and social objectives outlined in this Plan relies upon modernisation and improvement of the capital’s stock of buildings and public realm, and this in turn means encouraging private investment and development.”*

Policy 2.11 of the Plan concerns the **Central Activities Zone** and part A (b) states that Boroughs should *“seek solutions to constraints on office provision and other commercial development imposed by heritage designations without compromising local environmental quality, including through high quality design to complement these designations.”*

Policy 3.1 states that planning decisions for development should protect and enhance facilities and services that meet needs of particular groups and communities.

Policy 7.4 states that developments should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Planning decisions for buildings should provide a high quality design response that considers the criteria set out under Policy 7.4.

Policy 7.6 confirms that at a strategic level architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. In relating this to planning decisions, the policy requires that buildings and structures should be of the highest architectural quality, be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm, comprises details and materials that complement, not necessarily replicate, the local architectural character.

Policy 7.8 concerns heritage assets and archaeology and advises that development should incorporate measures that identify record, interpret, protect and, where appropriate, present the site’s archaeology. For planning decisions, development should identify value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

5.4 Local Planning Policy

In terms of the local planning policy, Camden Council adopted their Core Strategy in 2010, which sets out the key elements of their vision for the borough and is a central part of their Local Development Framework. Alongside the Core Strategy, Camden adopted Development Policies, which set out detailed planning criteria that are used to determine applications in the borough. The application has also considered the relevant supplementary planning documents, the Charlotte Street Conservation Area Appraisal and Management Strategy and the Fitzrovia Area Action Plan.

5.4.1. Core Strategy Policies

Policy CS1 sets out the Council's overall approach to growth and development stating, *"the Council will focus Camden's growth in the most suitable locations, and manage it to make sure that we deliver its opportunities and benefits and achieve sustainable development, while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit."*

In addition, the policy states that they Council will promote appropriate development in growth areas and other highly sustainable locations, in particular in Central London. Following this approach, the Council expects that in the order of 12,250 additional homes will be provided in Camden between 2010/11 and 2024/25.

Policy CS1 further states that the Council will promote the efficient use of land and buildings in Camden by:

- d) 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;*
- e) resisting development that makes inefficient use of Camden's limited land;*
- f) expecting development that will significantly increase the demand of travel to be located in growth areas and other highly accessible parts of the borough;*
- g) expecting high density development in Central London, town centres and other locations well served by public transport; and*
- h) expecting 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.*

Policy CS3 relates to highly accessible areas and states that the Council will promote appropriate development in Central London, including those areas outside of Growth Areas. These areas are considered to be suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities and are particularly suitable for uses that are likely to significantly increase the demand for travel.

Policy CS5 seeks to manage the impact of growth and development in Camden. The Council will ensure that development meets the full range of objectives of the Core Strategy and other Local Development Framework documents, with particular consideration given to:

- a) providing uses that meet the needs of Camden's population and contribute to the borough's London-wide role;*
- b) providing the infrastructure and facilities needed to support Camden's population and those who work in and visit the borough;*
- c) providing sustainable buildings and spaces of the highest quality; and*
- d) protecting and enhancing our environment and heritage and the amenity and quality of life of local communities.*

The policy also states that the Council will protect the amenity of Camden's residents and those working in and visiting the borough by:

- e) *making sure that the impact of developments on their occupiers and neighbours is fully considered;*
- f) *seeking to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities; and*
- g) *requiring mitigation measures where necessary.*

Policy CS6 deals with providing quality homes and states that the Council will aim to make full use of Camden's capacity for housing by:

- a) *maximising the supply of additional housing to meet or exceed Camden's target of 5,950 homes from 2007-2017, including 4,370 additional self-contained homes;*
- b) *maximising the supply of additional housing over the entire plan period to meet or exceed a target of 8,925 homes from 2010-2025, including 6,550 additional self-contained homes;*
- c) *supporting the supply of additional student housing, bedsits and other housing with shared facilities providing this does not prejudice the Council's ability to meet the target for the supply of additional self-contained homes, the balance of uses in the area; and the quality of residential amenity or the character of the surrounding area;*
- d) *minimising the net loss of existing homes;*
- e) *regarding housing as the priority land-use of Camden's Local Development Framework.*

Policy CS7 concerns Camden's centres and shops. The policy states that the Council will promote the distribution of retail growth across the borough through some provision in town centres and Central London Frontages where opportunities emerge.

The policy also aims to promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors by:

- e) *seeking to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located;*
- f) *providing for, and maintaining, a range of shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice.*
- g) *protecting and promoting small and independent shops, and resisting the loss of shops where this would cause harm to the character and function of a centre;*
- h) *making sure that food, drink and entertainment uses do not have a harmful impact on residents and the local area, and focusing such uses in Camden's Central London*
- i) *Frontages, Town Centres and the King's Cross Opportunity Area;*
- j) *supporting and protecting Camden's local shops, markets and areas of specialist shopping.*
- k) *pursuing the individual planning objectives for each centre, as set out below, including through the delivery of environmental, design, transport and public safety measures.*

Para. 7.18 provides further guidance and states that food, drink and entertainment uses add to the diversity and vibrancy of Camden's centres and bring activity to them outside normal shopping hours. These uses are important to the borough socially, culturally and economically, and contribute to Camden's image as a vibrant and attractive place. The dense, mixed-use nature of much of the borough, means that it is particularly important that town centre uses such as food, drink and entertainment uses are managed so that they do not cause harm to surrounding communities and the local environment. The Council wants to see the borough continue to be a successful location for food, drink and entertainment uses while making sure that the quality of life of local people, workers and visitors is not harmed.

Para. 7.19 states food, drink and entertainment uses, such as restaurants, pubs and bars, music venues, cafés and hot food take-aways, are most appropriately located in commercial areas to

minimise their impact on the amenity of local residents. Town centres and Central London Frontages are considered the most suitable locations for such uses.

Para. 7.20 states the Council recognises that individual small-scale food and drink uses outside larger centres can be important local facilities, reducing the need to travel and providing community meeting places. It therefore considers that neighbourhood centres are suitable for small-scale food and drink uses (generally less than 100 square metres) which serve a local catchment, provided they do not cause harm to the surrounding area or residents.

Policy CS8 states that the Council will secure a strong economy in Camden and seeks to ensure that no one is excluded from its success. The Council will:

- a) *promote the provision of 444,000sqm of permitted office floorspace at King's Cross as well as in the range of 70,000sqm of office provision at Euston with further provision in the other growth areas and Central London to meet the forecast demand of 615,000sqm to 2026;*
- b) *support Camden's industries by:*
 - *safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers;*
 - *safeguarding the borough's main Industry Area; and*
 - *promoting and protecting the jewellery industry in Hatton Garden;*
- c) *expect a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises, such as managed, affordable workspace;*
- d) *support local enterprise development, employment and training schemes for Camden residents;*
- e) *recognise and encourage the concentrations of creative and cultural businesses in the borough as well as supporting the development of Camden's tourism sector whilst ensuring that any new facilities meet the other strategic objectives of the Core Strategy; and*
- f) *recognise the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.*

Policy CS9 states that the Council will support and promote the Central London area of Camden as a successful and vibrant part of the capital to live in, work in and visit. The Council will:

- a) *recognise its unique role, character and challenges;*
- b) *support Central London as a focus for Camden's future growth in homes, offices, shops, hotels and other uses;*
- c) *seek to ensure that development in Central London, in the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn and beyond, contributes to London's economic, social and cultural role while meeting the needs of local residents and respecting their quality of life;*
- d) *support residential communities within Central London by protecting amenity and supporting community facilities;*
- e) *seek to secure additional housing and affordable homes, including as part of appropriate mixed use developments;*
- f) *take into account the specific identity of the areas within Central London when taking decisions on planning applications and in relevant initiatives and works;*
- g) *promote and protect areas of specialist activity, such as the Museum Street area and Hatton Garden;*
- h) *support the concentration of medical, educational, cultural and research institutions within central London;*
- i) *preserve and enhance the area's historic environment;*
- j) *seek to improve the quality of the area's streets and places, the connections between them and the ease of movement into, and through, the area;*
- k) *continue to designate Central London as a Clear Zone Region to reduce congestion, promote walking and cycling and improve air quality;*
- l) *promote improved community safety;*
- m) *manage the location and concentration of food, drink and entertainment uses and their impact.*

Policy CS11 is concerned with promoting sustainable and efficient travel and states that the Council will promote the delivery of transport infrastructure and the availability of sustainable transport choices in order to support Camden's growth, reduce the environmental impact of travel, and relieve pressure on the borough's transport network.

Policy CS13 deals with tackling climate change through promoting higher environmental standards and advises that the Council will require all development to take measures to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation.

Policy CS14 seeks to promote high quality places and to conserve the heritage of the borough. The policy states that the Council will ensure that Camden's places and buildings are attractive, safe and easy to use by:

- a) *requiring development of the highest standard of design that respects local context and character;*
- b) *preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;*
- c) *promoting high quality landscaping and works to streets and public spaces;*
- d) *seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;*
- e) *protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views.*

Para 14.3 recognises that Camden has many special and unique places and historic and modern buildings of the highest quality. The Council states that *"as well as preserving this rich heritage, we should also be contributing to it by making sure that we create buildings of equally high quality that will be appreciated by future generations. The design of the places and buildings that make up our local environment affects us all and our quality of life. High quality design is visually interesting and attractive but it is not just about what things look like. Good design makes places that put people first, are welcoming, feel safe and are enjoyable and easy to use for everyone, whether they are living in, working in or just passing through the borough"*.

Furthermore, **Para 14.7** states that high quality design also takes account of its surroundings and what is distinctive and valued about the local area. Camden is made up of a diversity of areas, each with their own distinctive character, created by many elements such as architectural style and layout, social and economic history, landscaping and mix of uses. As Camden is a densely built-up borough where most development involves the replacement, extension or conversion of existing buildings, taking account of context and local character is particularly important. The Council will therefore expect the design of buildings and places to respond to the local area and its defining characteristics and reinforce or, if appropriate, create local distinctiveness.

Policy CS18 seeks to make sure developments include facilities for the storage and collection of waste and recycling.

5.4.2. [Development Management Policies](#)

Policy DP2 is concerned with making full use of Camden's capacity for housing and states that the Council will seek to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing.

Policy DP5 seeks to provide homes of different sizes and states that the Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes.

Policy DP12 seeks to support strong town centres and manage the impact of food, drink, entertainment and other town centre uses. The Policy states that the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not

cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. The Council will consider:

- a) *the effect of non-retail development on shopping provision and the character of the centre in which it is located;*
- b) *the cumulative impact of food, drink and entertainment uses taking into account the number and distribution of existing uses and non-implemented planning permissions, and any record of harm caused by such uses;*
- c) *the impact of the development on nearby residential uses and amenity, and any prejudice to future residential development;*
- d) *parking, stopping and servicing and the effect of the development on ease of movement on the footpath;*
- e) *noise and vibration generated either inside or outside of the site;*
- f) *fumes likely to be generated and the potential for effective and unobtrusive ventilation;*
- g) *the potential for crime and anti-social behaviour, including littering.*

Policy DP13 deals with employment premises and sites and advises that the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:

- a) *it can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use; and*
- b) *there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.*

Where a change of use has been justified to the Council's satisfaction, the Council will seek to maintain some business use on site, with a higher priority for retaining flexible space that is suitable for a variety of business uses.

Where premises or sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed use schemes provided that:

- a) *the level of employment floorspace is maintained or increased;*
- b) *they include other priority uses, such as housing and affordable housing;*
- c) *premises suitable for new, small or medium enterprises are provided;*
- d) *floorspace suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses;*
- e) *the proposed non-employment uses will not prejudice continued industrial use in the surrounding area.*

Para 13.6 states that where premises or sites are suitable for continued business use, the Council will consider redevelopment schemes which maintain the employment floorspace and provide other priority uses, such as housing. 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 sized enterprises¹ (SMEs) and creative businesses).

Policy DP17 is concerned with walking, cycling and public transport and advises that the Council will promote walking, cycling and public transport use. Development should make suitable provision for pedestrians, cyclists and public transport.

Policy DP18 deals with parking standards and limiting the availability of car parking and advises that the Council will seek to ensure that developments provide the minimum necessary car and cycle parking provision.

Policy DP22 seeks to promote sustainable design and construction and states that the Council will require development to incorporate sustainable design and construction measures.

DP24 deals with securing high quality design and advises that the Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

- a) *character, setting, context and the form and scale of neighbouring buildings;*
- b) *the character and proportions of the existing building, where alterations and extensions are proposed;*
- c) *the quality of materials to be used;*
- d) *the provision of visually interesting frontages at street level;*
- e) *the appropriate location for building services equipment;*
- f) *existing natural features, such as topography and trees;*
- g) *the provision of appropriate hard and soft landscaping including boundary treatments;*
- h) *the provision of appropriate amenity space; and*
- i) *accessibility.*

Para 24.6 advises that the Council seeks to encourage outstanding architecture and design, both in contemporary and more traditional styles. Innovative design can greatly enhance the built environment and, unless a scheme is within an area of homogenous architectural style that is important to retain, high quality contemporary design will be welcomed.

Policy DP25 aims to maintain the character of Camden's conservation areas, and the Council will:

- a) *take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;*
- b) *only permit development within conservation areas that preserves and enhances the character and appearance of the area;*
- c) *prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;*
- d) *not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and*
- e) *preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.*

Policy DP26 seeks to manage the impact of development on occupiers and neighbours to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors the Council will consider include:

- a) *visual privacy and overlooking;*
- b) *overshadowing and outlook;*
- c) *sunlight, daylight and artificial light levels;*
- d) *noise and vibration levels;*
- e) *odour, fumes and dust;*
- f) *microclimate;*
- g) *the inclusion of appropriate attenuation measures.*

We will also require developments to provide:

- h) *an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;*
- i) *facilities for the storage, recycling and disposal of waste;*
- j) *facilities for bicycle storage; and*
- k) *outdoor space for private or communal amenity space, wherever practical.*

Policy DP27 advises that in determining applications for lightwells, the Council will consider whether:

- i) *the architectural character of the building is protected;*
- j) *the character and appearance of the surrounding area is harmed; and*
- k) *the development results in the loss of more than 50% of the front garden or amenity area.*

Policy DP29 is concerned with improving access and advises that the Council will seek to secure accessible homes.

Policy DP30 deals with shopfronts and states that the Council will expect a high standard of design in new and altered shopfronts, canopies, blinds, security measures and other features. When considering proposals for shopfront development the Council will consider:

- a) *the design of the shopfront or feature;*
- b) *the existing character, architectural and historic merit and design of the building and its shopfront;*
- c) *the relationship between the shopfront and the upper floors of the building and surrounding properties, including the relationship between the shopfront and any forecourt or lightwell;*
- d) *the general characteristics of shopfronts in the area; and*
- e) *community safety and the contribution made by shopfronts to natural surveillance*

The Council will resist the removal of shop windows without a suitable replacement and will ensure that in appropriate cases where shop, service, food, drink and entertainment uses are lost, a shop window and visual display is maintained.

Where an original shopfront of architectural or historic value survives, in whole or in substantial part, there will be a presumption in favour of its retention. Where a new shopfront forms part of a group where original shop fronts survive, its design should complement their quality and character.

6.0 PLANNING CONSIDERATIONS & BALANCE

6.1 Introduction

Section 38(6) of the Planning and Compulsory Purchase Act 2004 refers to the development plan as a whole and states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

The Framework makes it clear that development plans must be prepared with the objective of contributing to the achievement of sustainable development and that they should be consistent with its policies and kept up to date. Wherever a development plan is absent, silent or its policies are out of date, or where there is more than limited conflict with the Framework, the Framework will carry greater weight as a material consideration in the determination of planning applications.

6.2 Principle of Development

6.2.1. 64 Charlotte Street & 32 Tottenham Street (A3/B1 uses at Ground & Basement Floors)

The scheme proposals seek to reconfigure and change the uses (i.e. swap over the approved uses) between adjacent properties at no 64 Charlotte Street and no. 32 Tottenham Street, at ground and basement floor levels. The schemes do not propose the complete loss of either of the existing B1 or A3 uses. Furthermore, the scheme does not introduce any new use classes.

Effectively, the proposal seeks to better locate each use to ensure that the uses relate more effectively to the other uses in the block of which they form part, and within the immediate street scene, and most particularly, as the corner at no. 64 presents itself on this pivotal intersection of busy, vibrant Charlotte Street (the neighbourhood’s main thoroughfare) and the smaller side street, Tottenham Street.

The principal reason for the scheme to relocate the A3 use to the prominent corner unit of this building, which benefits from large retail-style window openings and dual frontage, is to significantly improve the attractiveness of the A3 accommodation by taking advantage of this prominent corner in Fitzrovia. Furthermore, in our view, allowing the A3 use to occupy the prominent corner unit will enhance the contribution of this building in townscape terms providing retail vitality on both Charlotte Street and Tottenham Street, as opposed to only on Tottenham Street.

The improvement and subtle growth of the A3 use is a clear opportunity to contribute towards the variety, vibrancy and choice of small-scale food, drink and entertainment uses in Fitzrovia. The increase in floorspace allows any incoming operator to have sufficient ancillary storage, kitchen and WC accommodation at basement floor level, with a lateral open-plan layout providing vibrancy and activity on both Charlotte Street and Tottenham Street.

The scheme proposes B1 office accommodation at ground and basement levels at no. 32 Tottenham Street and A3 accommodation at ground and basement levels at no. 64 Charlotte Street. This change of use is considered to be acceptable, which is confirmed by the Council, as has recently been consented by the Council under planning permission 2016/3133/P.

6.2.2. 66 Charlotte Street (A1/B1 uses at Ground, Basement & First Floors)

Both Schemes A and B seek to retain, refurbish and improve the existing A1 retail use at ground floor level, as well as the B1 office use at basement floor level.

The current retail and office accommodation at ground and basement floor levels is of a fairly poor quality. In particular, the basement floor level office accommodation has poor natural ventilation and outlook, and would certainly not meet modern day office standards. The retail accommodation, whilst slightly better in quality than the basement office accommodation, needs investment and

improvement. The ground floor frontage on Charlotte Street is uncharacteristic of the street, and detracts from the character and appearance of the conservation area.

The schemes propose to introduce a lightwell and new shopfront to both the ground floor and basement floor levels. The scheme allows for dedicated separate access for the basement floor office unit, directly from street level, creating a small to medium self-contained office space well-suited to SMEs. The scheme maintains the two entrances from Charlotte Street at ground floor level; one to serve the retail unit and the other for residential use. The more traditional entrance door to the building, which currently serves the upper floors, will be used as separate entrance to a new lift to provide access to the penthouse residential flat at no. 64.

The scheme proposals will result in the net increase of useable retail accommodation at ground floor level, and the net increase of office accommodation at basement floor level at no. 66, which will be self-contained and accessed from no. 66.

The scheme also seeks to excavate a basement level and replace the buildings to the rear of no. 66 to create high quality office accommodation linked to the office accommodation to be created at no. 32 Tottenham Street. The buildings beyond the principal rear elevation of no. 66 are awkward and poor quality office spaces. The scheme proposals seek to consolidate and improve the quality and functionality of the office accommodation currently at no. 66 across the ground, first and second floors.

In association with the change of use between no. 64 and no. 32, the scheme creates modern, attractive and functional office floorspace at basement, ground and first floor levels to the rear of no. 66, which will benefit from access from no. 32 Tottenham Street at basement and ground floor level. The two entrances, at different levels, offers flexibility in terms of attracting both large companies, who may be attracted to the larger floorplates, as well as SMEs who may wish to only take part of this space.

6.2.3. 66 Charlotte Street (C3 use at First, Second, and Third Floors)

The scheme proposals seek to convert the first and second floors from office use to residential use. The existing third floor is already in residential use, and no change of use is proposed to this floor.

- **Scheme A** seeks to create 2 x 2-bedroom flats and 1 x 4-bedroom flat
- **Scheme B** seeks to create 2 x 2bedroom flats and 1 x 1-bed flat

The loss of office floorspace will be compensated for by the re-provision of office floorspace at basement, ground and first floor levels, as highlighted above. Moreover, the proposed office accommodation will be more efficient, and of a higher quality than the existing.

Both scheme proposals provide an appropriate mix of housing units given the site's sustainable location in Central London. Paragraph 3.29 of the London Plan supports the scheme stating that higher density provision for smaller households should be focused on areas with good public transport accessibility. The residential units will be of a high quality and have been designed to meet Lifetime Homes Standards, as well as the London Plan standards.

6.2.4. Summary of Land Uses

The table below seeks to set out the existing and proposed sqm for each land use, and the net difference for each use for both Scheme A and B. These areas are based on the area schedule by RCA Architects.

Land Uses	Existing	Proposed Scheme A	Proposed Scheme B	Difference +/-
A1	35sqm	45sqm	45sqm	+10sqm
A3	74sqm	101sqm	101sqm	+27sqm
B1	326sqm	316sqm	316sqm	-10sqm
C3	55sqm	240sqm	185sqm	(A) +185sqm (B) +130sqm

Please note, whilst the residential areas for the upper floors of no. 64 have been included in RCA's area schedule, there is no change to these residential flats and they do not form part of this application. Therefore, in the table above, relating to land uses for the application scheme proposals, these figures are not included.

Whilst we acknowledge and appreciate that there is a net loss of office floorspace, this is similar to the amount of office floorspace to be lost by planning permission 2016/3133/P. In respect of all other uses, the scheme proposals seek to enhance and improve the floorspace provision. The enhanced provision of both residential, retail and restaurants uses in this part of Central London and Camden is supported in policy terms.

6.3 Conservation and Design

Planning policy at both at a national and local level clearly aims to preserve heritage assets, including conservation areas, and a high quality of design is the objective for new development. The scheme design has been carefully developed with care and attention to the architectural scale and appearance of the host building, neighbouring properties and the surrounding conservation area.

The scheme seeks consent for a new lightwell and new replacement shopfront to the retail unit at no. 66 Charlotte Street. The ground floor frontage on Charlotte Street is of poor quality, design and appearance, uncharacteristic of the street, and detracts from the character and appearance of the conservation area.

The proposed new shopfront has been designed with care and attention to the existing character, architectural and historic merit and design of no. 66 Charlotte Street, as a well as the neighbouring buildings on Charlotte Street.

The proposed shopfront adopts a refined and modern design approach. Similar to the approved shopfront at no. 64, the scheme proposes a large glazed shopfront window, accompanied by a glazed door providing access to the retail unit and a painted timber door providing access to the residential units on the upper levels. The proportions of these features are considered to be acceptable and have been designed to respect the proportions of the shopfront and the adjacent shopfront at no. 64. The materials are considered to be appropriate to the conservation area, and will complement the host building.

The colour of the shopfront, as shown as a cream on visuals, can be agreed with the Council during the course of the application, or alternatively, can be conditioned for the Council's prior approval. Furthermore, any advertisement details can be required by condition.

In association with remodelling works to the basement/lower ground floor level of no. 66, the proposal also seeks to introduce an external lightwell to match the width and design of that approved at no. 64 Charlotte Street. It is clear that there will be no harm to the character and appearance of the host buildings or the surrounding area. The CAA highlights that the use of cast iron railings along frontages to separate the pavement from basement lightwells is characteristic of this area. The proportions of the basement/lower ground floor façade have been designed to appear subordinate to

the proposed shopfront above. The proposed lightwell will reinforce the prevailing character along Charlotte Street, where they are a common feature.

When compared against the previous shopfront, the proposals will clearly improve the character and appearance of the building while also enriching the use of the lower ground floor with increased natural daylight and sunlight, which will cumulatively secure the long-term use of both the retail unit and office floorspace in this popular area of London. In our view, the new lightwell and remodelling works should be considered as clear heritage benefits of the scheme.

The proposed extension to the rear of the property is of a contemporary design comprising brushed copper cladding and glazed panels that continue across the walls and roof of the extension. The brushed copper panels relate back to the previous use of the building as an etching workshop while also complimenting the terracotta tonality of the surrounding bricks. The modern design of the proposed extension will create a point of attractive architectural interest when glimpsed in the limited public views (from Charlotte Mews) and private views of the surrounding area. The location of the proposed extension in this part of the conservation area, in our view, presents an opportunity to provide a high quality, contemporary and unique piece of architecture that relates to the historic use of the host building. A useful and comparable example which demonstrates that such an extension can work well in a historic setting is a scheme by for GMS Estates by Emrys Architects on Great James Street. The scheme extended two Grade II listed terraced Georgian properties with a asymmetric copper extension. The scheme was shortlisted for an RIBA Regional Award, won a Camden Design Award and was commended at the Blueprint and the NLA Awards.

The proposed mansard roof extension, which forms part of Scheme A, will allow for the provision of a family sized unit to be provided in this highly sustainable location and will not adversely affect the architectural character or unity of the host building. No. 66 Charlotte Street is directly adjacent to a recently approved mansard extension currently under construction at no. 64. The roofline from the corner at no. 64 north along Charlotte Street has been broken as a result of this approval. Whilst the mansard extension at no. 64 was granted at appeal with the acknowledgement that no. 66-72 comprises a terrace with an unbroken roofline, the context of the built environment now needs to be considered. Moreover, having further explored the roofscape of the wider terrace at no. 66-72, it is clear that this roofline has been much altered over time. As such, in our view, the proposed roof extension will read as a continuation of the mansard form on this part of the Charlotte Street terrace. The proposed traditional materials of the mansard roof will ensure that no material harm is caused to the appearance of no. 66 but rather, will complement the host building and the terrace, as a whole.

Both Schemes A and B are similar, except for the works at roof level. Where Scheme A seeks consent for a new mansard extension, Scheme B seeks consent for a replacement roof structure with no accommodation. Scheme B has been designed to replace the existing roof structure, which is in a reasonably poor state of repair, with a new roof which maintains the existing roof slope, albeit slightly increases the overall roof height. However, in both long and short views from public vantage points, this increase will barely be noticeable and will not result in any material harm to the character and appearance of the host building or the conservation area.

Overall, the proposals will bring about clear private investment into the built environment, which will lead to clear improvements to the building fabric, appearance and contribution made by no. 66 within this part of Camden and the Charlotte Street Conservation Area. The proposals include the upgrading and sympathetic replacement of all windows at no. 66, which will significantly improve the character and appearance of the building in the conservation area. The scheme is sensitive to the public views within the conservation area, as the key designated heritage asset for this application. Verified CGI views have been produced to demonstrate how the scheme proposals will seamlessly knit together with the host building and neighbouring properties on Charlotte Street and the conservation area as whole. The proposed extensions have been designed to be subordinate to the host building.

The character and appearance of development in this part of the conservation area, and in particular, at the junction of Charlotte Street and Tottenham Street, is varied and eclectic with different rooflines, architectural styles and building materials, albeit the scheme proposals will be similar in design and form to no. 64 Charlotte Street and no. 69 Charlotte Street opposite.

The proposals will not be detrimental to the architectural or historic integrity of the buildings. In our view, the proposal brings about clear public benefits, which are proportionate to the scale of the scheme. The key public benefit is that the proposal makes efficient use of this highly sustainable site to provide important and much-needed residential accommodation in central London. Furthermore, the refurbishment and upgrading of the existing unattractive shopfront and the provision of higher quality commercial floorspace are clear public benefits that do not result in any material harm to the character or appearance of the conservation area.

The scheme proposals have been very carefully designed to ensure they are of the highest quality that will contribute positively towards the local distinctiveness and design quality in this part of Camden. Overall, it is clear that the proposals represent a modern yet respectfully designed scheme, which seeks to make efficient use of a highly sustainable site in central London. The proposals have been design with care and attention to all national and local planning policies and guidance and had particular regard to London Plan policies 7.4, 7.6 and 7.8 and local plan policies CS1, CS3, CS5, CS6, CS7, CS8, CS9, CS14, DP24, DP25, DP27 and DP30.

In conclusion, the proposals, whilst significant in terms of investment and the enhancement of the quality of the site, are minor and discreet when considering the impact on the public views and character of the conservation area as the designated heritage asset – which is very clearly demonstrated by the verified CGI visuals. The proposals result in little to no harm to the conservation area, and where there is less than substantial harm, the public benefits arising in respect of the new shopfront, lightwell, external improvements, and provision of high quality accommodation, are considered to be sufficient to outweigh this harm. The proposals are considered to be fully compliant with the requirements of all national and local planning policy documents and guidance.

6.4 Amenity

The proposed residential units would not have access to private outdoor amenity space, however, given the constraints of the existing building, this, in our view, is considered to be acceptable.

The scheme proposals have been designed to ensure there will be no adverse impacts on neighbouring properties. The proposed rear extension and mansard extension are unlikely to adversely impact on adjacent properties over and above the current situation, particularly with regard to privacy or overlooking impacts and daylight and sunlight impacts.

A Daylight and Sunlight Assessment has been submitted with the application, which assesses the windows of the adjacent properties that are most likely to be affected by the scheme proposals. The results of the daylight assessment demonstrate that all the identified windows meet the BRE criteria for daylighting and concludes that the proposed development will have no impact on the daylight availability of the surrounding buildings. Furthermore, the assessment concludes that the proposed development is likely to have an impact of negligible significance on the sunlight availability of the adjacent properties. Full details of the daylight and sunlight assessment of the proposed development are set out in the accompanying report.

The existing A3 unit has been in operation for many years, and the proposal simply seeks to subtly relocate and increase the floorspace of this use to improve the functionality and attractiveness of this accommodation. The scheme does not introduce or create a new A3 use.

The proposal will not result in any substantial harm to local residents or neighbours to the application site, as the unit will remain a small-scale café/restaurant use with a floorspace of approx. 101sqm. The existing extract and plant equipment, which was erected in the early 1990s will be replaced, as previously consented under planning permission 2016/3133/P.

The proposals are considered to be acceptable in accordance with policies CS7, CS9, DP12, and DP26. Furthermore, the proposals should be supported in accordance with supporting policy guidance in CPG5 and the Fitzrovia Area Action Plan.

6.5 Transport

The site is well located in Central London. The site has a PTAL rating of 6b, which demonstrates an 'excellent' accessibility for public transport. On this basis, the scheme proposals seek to encourage and support sustainable modes of transport including cycling and walking by proposing a car-free development.

The scheme has been designed with designated safe and secure cycle spaces in accordance with the London Plan standards (1 space per 1bed unit and 2 spaces per 2+bed units). These are located within the communal cycle store accessed via the Tottenham Street pedestrian entrance to no. 64.

Overall, in accordance with the NPPF, the development would not have a 'severe' cumulative impact on the local highway and transport network, and for that reason, it is considered that there are no highway or transport reasons for not permitting the development.

The proposals are considered to be acceptable in accordance with Local Plan policies CS11, DP17 and DP18.

6.6 Sustainable Development

Based on the detailed assessment of the proposals undertaken against the relevant policy objectives of the development plan and the Framework, contained in this statement above, the following conclusions can be drawn.

Economic Considerations: The proposed development will positively contribute towards building a strong, responsive and competitive UK economy.

Paragraph 19 of the NPPF advises that significant weight should be placed on the need to support economic growth through the planning system. The proposal represents important investment to improve the quality and attractiveness of this highly sustainable site for continued retail and office use and can be considered essential to sustainable economic growth. The proposal seeks to improve and enhance the attractiveness of each of the uses to contribute to the vitality of the local area.

Substantial weight should therefore be attached to the economic dimension of the development and the range of benefits it will deliver in the sustainability assessment.

Social considerations: The social dimension of the development is measured by its contribution to local community well-being, the protection of local amenity and the living conditions of local residents.

The proposal fully recognises the need to protect the quality of life and residential amenities of the local community living in proximity to the development. The scheme is designed to provide a high-quality accommodation, and careful attention has been paid to the relationship with surrounding properties to ensure they are not harmed by undue noise, vibration, loss of outlook, loss of privacy or other nuisance or disturbance during the implementation and operation of the development.

Overall, there will be no detrimental impacts arising as a result of the proposal on neighbouring properties' amenity. Therefore, the social dimension of the proposals is positive and should therefore carry weight in the sustainability balance.

Environmental Consideration: The site is not affected by any environmental constraints that cannot be mitigated and the proposed development has been designed to minimise its effect upon the natural, built and historic environment.

An energy assessment has been carried out on the scheme proposals to identify the most effective strategy for the development to meet the necessary sustainability requirements. The building fabric performance will meet or exceed the Part L 2013 requirements where applicable with the most appropriate renewable measures identified in the accompanying report. Full details of the sustainable aspects of the scheme are set out in the supporting Energy Strategy Report.

Substantial weight should be attached to the environmental dimension of the development and the improvement in the sustainability assessment.

7.0 SUMMARY & CONCLUSIONS

This statement has been prepared in support of two sets of scheme proposals at nos. 66 and 64 Charlotte Street and no. 32 Tottenham Street, London W1T 4QE.

The scheme accords with the key considerations confirmed in the London Plan, Camden's Core Strategy and Development Management Policies. It is compliant with the relevant policy context as confirmed below:

- ✓ The schemes seek to maintain and improve existing B1 office use, A1 retail use, A3 restaurant/café use and C3 residential use.
- ✓ The proposals do not seek to introduce any new uses and only relate to enhancing and improving the quality and provision of existing uses.
- ✓ The proposals subtly relocate and increase the A3 accommodation to improve the functionality and attractiveness of an existing small-scale A3 use in a Central London, highly accessible mixed-use area.
- ✓ The schemes will maintain the character and function of the existing small-scale A3 unit, whilst improving the vitality of this prominent street corner.
- ✓ The schemes seeks to enhance the provision of flexible, modern and high quality B1 floorspace, which will be suitable for SMEs, as well as larger companies.
- ✓ The scheme will result in the provision of much needed residential accommodation in a highly sustainable location in central London, with Scheme A ensuring the provision of a high quality family unit.
- ✓ The amenity of adjoining properties or future occupants would not be affected adversely in any way.
- ✓ The proposed scheme designs have been approached with care and consideration to the character, appearance and views within the Charlotte Street Conservation Area.
- ✓ It has been demonstrated that the proposals will amount to sustainable development in accordance with the Framework and in all other regards they would not give rise to any adverse impacts, which significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole.
- ✓ The scheme proposals constitute sustainable development and should be approved in accordance with the NPPF.

Our statement has objectively demonstrated that the proposed development schemes constitute sustainable development, and ought therefore to be approved. In particular, the NPPF states that significant weight should be placed on the need to support both economic and housing growth through the planning system.

Taking into account this assessment and all relevant planning and conservation related matters, we consider that there are sound planning and conservation reasons to support these development schemes. We trust our development proposals and the private investment that they represent will be supported by your Officers – and that planning permission will be granted.

