

Arthur Stanley House

Planning Statement



Westbrook Partners / 1921 Mortimer Investments Limited

July 2017



ARTHUR STANLEY HOUSE

PLANNING STATEMENT

JULY 2017

DP9 Limited
100 Pall Mall
London
SW1Y 5NQ

Tel: 020 7004 1700
Fax: 020 7004 1790

CONTENTS

1.	INTRODUCTION	3
2.	THE SITE AND SURROUNDING AREA	5
3.	PLANNING HISTORY	7
4.	THE PROPOSED DEVELOPMENT	8
5.	PRE-APPLICATION CONSULTATION	11
6.	PLANNING POLICY FRAMEWORK	12
7.	PLANNING ASSESSMENT	14
8.	CONCLUSIONS	29

1.0 INTRODUCTION

1.1 This Statement is submitted on behalf of 1921 Mortimer Investments Limited (hereafter referred to as ‘the Applicant’). The Statement accompanies an application for full planning permission at Arthur Stanley House (‘the site’).

1.2 Full planning permission is sought for:

“Refurbishment of the existing eight storey Arthur Stanley House (ground plus seven storeys, with two lower ground floor levels), reconfiguration of the seventh floor and extension at the rear of the building and construction of a new build element to the rear facing Tottenham Mews to enable a change of use from health care (Class D1) to a mixed use development comprising office floorspace (Class B1), flexible office (Class B1)/ health care (Class D1) floorspace at ground and first floor levels and 9 residential units (Class C3) (4 x 1 bed; 4 x 2 bed; 1 x 3 bed) and associated landscaping fronting Tottenham Mews including all necessary enabling works.”

1.3 This planning application follows the grant of planning permission on appeal (2015/0391/P) (APP/X5210/W/15/3141159) in October 2016 which established the principle of an office-led mixed use scheme on the site. The current proposals comprise an alternative approach to the refurbishment of the site and provision of a mixed use scheme. It is considered that this approach is an improvement on the consented proposals in design terms and will sit more comfortably within the Charlotte Street Conservation Area. The proposed scheme is superior to the consented scheme in terms of external and internal design and efficiency.

1.4 The proposals will result in the regeneration of this vacant site and will meet an identified demand for high quality office accommodation within this location, resulting in job creation. The proposed development has been designed to attract creative occupiers seeking workspace in Fitzrovia, an area which currently has a constrained supply of office accommodation.

1.5 The scheme also includes the provision of a flexible Class D1/Class B1 use, which can provide accommodation for a GP surgery if this is required.

1.6 The provision of 9 residential units and associated affordable housing payment will contribute towards Camden’s housing targets, while the units themselves meet and exceed the residential

design standards and policy requirements. The proposed design of the residential units meets the current market demand for modern loft style mews accommodation.

1.7 This Statement has been prepared by DP9 Limited ('DP9') and details the planning case for the proposed development. It assesses the development in the context of adopted and emerging planning policy and guidance at national, regional and local level and within the context of the site's planning history. The Planning Statement should be read in conjunction with other information submitted to accompany the planning application, comprising:

- Planning Application Form, prepared by DP9 Ltd;
 - Community Infrastructure Levy (CIL) – Planning Application Additional Information Requirement Form, completed by the Applicant;
 - Planning Application Drawings, prepared by Allford Hall Monaghan Morris Architects;
 - Design and Access Statement, prepared by Allford Hall Monaghan Morris Architects;
 - Air Quality Assessment, prepared by Waterman;
 - Draft Construction Management Plan, prepared by Crosby Transport Planning;
 - Energy and Sustainability Statement, prepared by Green Building Design Consultants;
 - Daylight/Sunlight Assessment, prepared by Point 2 Surveyors;
 - Noise Impact Assessment, prepared by Sandy Brown Consultants;
 - Townscape, Visual Impact and Heritage Assessment prepared by Peter Stewart Consultancy;
 - Preliminary Ecological Assessment, prepared by The Ecology Consultancy;
 - Transport Assessment, prepared by Crosby Transport Planning;
 - Travel Plan, prepared by Crosby Transport Planning;
- and
- Statement of Community Involvement, prepared by West 5 Consulting.

1.8 This Planning Statement is structured as follows:

- **Section 2** provides a brief review of the site location and its surrounding context;
- **Section 3** sets out the background and planning history of the site;
- **Section 4** details the proposed development;
- **Section 5** sets out the relevant planning policy;
- **Section 6** assesses the proposed development against relevant planning policy; and
- **Section 7** provides a summary and conclusions.

2.0 THE SITE AND SURROUNDING AREA

Site description

- 2.1 The Site is located within the Bloomsbury Ward in LB Camden. Situated on Tottenham Street, it lies east of Cleveland Street and west of Charlotte Street. The eastern elevation of the Site fronts Tottenham Mews.
- 2.2 The Site comprises a vacant hospital outpatient facility with ancillary offices. The existing building comprises 6,164sqm GEA. The Site was last in use in 2005/6 by University College London Hospital Trust, and has been vacant for more than 10 years.
- 2.3 All of the hospital services which took place at the site were relocated to the main UCLH site on Euston Road in 2005/6.
- 2.4 Arthur Stanley House is an ground plus seven storey brick-faced post war block of limited architectural merit. The Site is located within the Charlotte Street Conservation Area, and is identified as a detractor in the Conservation Area Appraisal due to its scale and bulk.
- 2.5 The Site has a PTAL level of 6b. This is the highest public transport accessibility rating.

The Surrounding Area

- 2.6 The surrounding area contains a range of built forms and scales with traditional four storey terraced buildings to the south and more modern institutional blocks of a similar scale to the subject building directly to the north.
- 2.7 There are listed heritage assets within the vicinity of the Site. No.39 Tottenham Street (directly opposite the Site) is a Grade II Listed building. Two buildings along Goodge Place to the south of the Site are also Grade II Listed. North of the Site, the Grade II* Listed BT Tower is also visible in the background in some street views of Arthur Stanley House.
- 2.8 The Site is identified in the Fitzrovia Area Action Plan (FAAP) as an opportunity site, as are several other sites in the vicinity, including Astor College (99 Charlotte Street), Middlesex Hospital Annex (44 Cleveland Street) and Tottenham Mews Day Hospital (14-19 Tottenham Mews).

- 2.9 Tottenham Day Mews (directly to the north of the Site), was granted planning permission on 13 December 2012 for the demolition of the existing building and the erection of a five storey building, including basement level and roof top plant enclosure, to provide a Mental Health Resource Centre including recovery centre, consultation and activity rooms (Class D2) and 6 x 1 bed short stay bedrooms (Class C2) (planning permission reference 2012/4786/P).
- 2.10 Astor College further north of the Site also secured planning permission on 27 August 2015 (reference 2015/1139/P) for the refurbishment of existing student accommodation comprising 2 storey upper ground floor front extension and 8 storey rear extension to provide 60 additional bedrooms, and overcladding, creation of ground floor Class A3 café and the pedestrianisation of Bedford Passage.
- 2.11 The Middlesex Annex site received a resolution to grant planning permission at Committee on 6th July 2017 for the provision of 50 residential units and 4,535sqn of flexible Class B1/Class D1 floorspace.

3.0 PLANNING HISTORY

- 3.1 Planning permission for the existing building was granted on 25 October 1962 (planning permission reference TP8221/C). The application was for the erection of an ground plus seven storey building, plus basement for the use of the Department of Physical Medicine and the School of Physiotherapy of the Middlesex Hospital. The building was designed by TP Bennett.
- 3.2 Planning permission was granted on 26 April 2011 for external additions and alterations to include the installation of four exhaust flues, external chiller enclosure and acoustic louvres at roof level, along with alterations to the ground floor entrance canopy in association with the building being used as pathology labs (Class D1) (planning permission reference 2011/0939/P). This consent was not implemented.

Planning Appeal (APP/X5210/W/15/3141159)

- 3.3 Planning permission was granted on appeal (2015/0391/P) (APP/X5210/W/15/3141159) for the refurbishment of the existing building and extension to enable a change of use from health care (Class D1) to a mixed use development comprises office (Class B1), flexible office/health care (Class B1/Class D1) and 12 residential units (Class C3). The appeal was granted 13th October 2016.
- 3.4 The appeal followed the refusal of planning permission (contrary to Officers' recommendation) on 2nd July 2015. A total of 11 reasons for refusal were set out on the decision notice. Of these 11 reasons, 8 related to the absence of a legal agreements and 2 related to the absence of a Travel Plan and a local employment agreement. These matters were addressed with the submission of a draft Section 106 Agreement, and the Inspector therefore considered that the main issue of the appeal related to whether the scheme made an appropriate contribution to the supply of new homes in the Borough in the context of the development plan.
- 3.5 After detailed consideration, the Inspector concluded that the proposed mix of uses was acceptable both in the context of the Camden Development Policies (2015) and Fitzrovia Area Action Plan (2014) and also in relation to the demand for office accommodation in the Fitzrovia area. Further details of this appeal decision and its relevance in the consideration of the current scheme are set out in the Planning Assessment section of this report.

4.0 PROPOSED DEVELOPMENT

4.1 This section provides a description of the proposed development, and describes how it has responded to pre-application advice. Full details of the proposals are provided within the Design and Access Statement, prepared by AHMM Architects.

Background

4.2 The proposals comprise an alternative approach to the refurbishment of the site and provision of a mixed use scheme. In particular it is considered that this approach is an improvement on the consented proposals in design terms providing high quality office, GP surgery and residential accommodation and would sit more comfortably within the Charlotte Street Conservation Area. The proposed development is a superior approach to the consented mixed use scheme which was granted at appeal in October 2016.

The proposals

4.3 Full planning permission is sought for:

“Refurbishment of the existing eight storey Arthur Stanley House (ground plus seven storeys, with two lower ground floor levels), reconfiguration of the seventh floor and extension at the rear of the building and construction of a new build element to the rear facing Tottenham Mews to enable a change of use from health care (Class D1) to a mixed use development comprising office floorspace (Class B1), flexible office (Class B1)/ health care (Class D1) floorspace at ground and first floor levels and 9 residential units (Class C3) (4 x 1 bed; 4 x 2 bed; 1 x 3 bed) and associated landscaping fronting Tottenham Mews including all necessary enabling works.”

Office Building

4.4 The existing building will be refurbished and extended. The proposed use of the building will be primarily for Class B1a office use, with the provision of an area suitable for a GP surgery at ground floor and first floor, which will have a flexible use of Class B1a/Class D1. The scheme will provide a total of 5,939sqm office floorspace (including refurbished and extended floorspace) and 524sqm of flexible Class D1/B1 use.

- 4.5 The proposals include the refurbishment of the existing building, with the removal of the existing loggia, refurbishment of the existing brick cladding and replacement of the existing windows.
- 4.6 The seventh floor of accommodation will be replaced and extended towards the rear of the building, with the provision of a terrace for office occupiers. The design of the top floor has been the subject of detailed pre-application discussions.
- 4.7 A new extension will be added at the rear to extend the existing building. The extended floorplates will tier at the upper floors to respect the neighbouring properties, which will provide the opportunity for terraces for the use of the office occupants. The terraces will be screened to ensure the privacy of neighbouring residents.
- 4.8 The existing lightwell will be increased in depth which will allow for more glazing on the Tottenham Street elevation at the lower levels of the building, increasing the daylight received and allowing the provision of high quality office accommodation at the lower floors. This office accommodation will be double height across a large area of the floorspace to allow for the inclusion of a feature spiral staircase.
- 4.9 The proposals include the provision of an area suitable for a GP surgery, which will have a flexible use of Class B1a/Class D1. This area is located at the rear of the building to ensure privacy, and has a separate access from Tottenham Street.
- 4.10 The main office building will be accessed via the main entrance which is located on the corner of Tottenham Street and Tottenham Mews. This entrance leads in to the office reception area, with access to the lifts. A secondary entrance is provided on Tottenham Street.
- 4.11 Cycle parking, showers and lockers are provided at lower ground floor (including an accessible WC and shower). A total of 72 cycle parking spaces are provided with 14 short space at ground floor on Tottenham Mews. Access to the basement storage area is via the stairway accessed via the dedicated cycle entrance on Tottenham Mews, or via lift from the office reception at ground floor.
- 4.12 Refuse storage is at basement level. Refuse will be transported to ground floor by the management team for collection.

Residential Mews Building

-
- 4.13 A new residential building will be erected facing on to Tottenham Mews providing 5 storeys of accommodation, with a total of 946sqm (GIA) of Class C3 floorspace. A total of 9 residential units will be provided (4 x 1 bed; 4 x 2 bed; 1 x 3 bed).
- 4.14 All units have been designed to meet the requirements of the London Housing Design Guidelines and the Camden Planning Guidance documents in terms of minimum sizing, access, circulation and storage provision. All apartments have also been designed to meet Lifetime Homes Guidance and meet the BRE Guidelines for internal daylight levels.
- 4.15 As requested by Officers during pre-application discussions, the residential units have Juliet balconies facing on to Tottenham Mews. This was considered to be a more appropriate response to the character of the mews as opposed to projecting balconies. The duplex units benefit from large terraces at lower ground floor, as does the unit at third floor.
- 4.16 Cycle parking is provided at ground floor within a secure cycle parking area with 16 cycle parking spaces. The change in floor levels means that there is a small set of steps between the street access and the cycle store, however there is a lift which can provide access between these two levels if required.
- 4.17 Refuse storage for the residential units is located at lower ground floor. The bins can be transported via the lift to ground level for collection.

5.0 PRE-APPLICATION CONSULTATION

5.1 The NPPF states that ‘*good quality pre-application discussion enables better communication between public and private resources and improved outcomes for the community*’. It encourages Applicants to take up pre-application advice services offered by Local Planning Authorities, as well as engage with their local community.

5.2 As such, the Applicant has undertaken detailed pre-application consultation with the decision making authorities, key stakeholders and the local community prior to the submission of the application.

Decision makers and statutory consultees

5.3 The Applicant has taken an active approach to engaging with the decision makers and key stakeholders throughout the design process, including detailed pre-application discussions with London Borough of Camden officers, Ward Councillors, the Bloomsbury Conservation Area Advisory Committee, Fitzrovia Neighbourhood Association and Charlotte Street Association.

Public consultation

5.4 Local stakeholders were also engaged through a public consultation event, which was held at the Fitzrovia Community Centre on 22nd June. Full details of this event and the feedback received is provided within the Statement of Community Involvement which is submitted in support of this application.

6.0 PLANNING POLICY FRAMEWORK

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise. This requirement is reiterated in the National Planning Policy Framework (NPPF). The purpose of this Section is to identify the key national, regional and local planning policy and guidance relevant to the determination of the planning application, and against which the proposals have been considered during design development.

National Planning Policy

6.2 The National Planning Policy Framework (NPPF) was adopted on 27th March 2012 and provides planning policy guidance at a national level and is a material consideration in the determination of planning applications.

6.3 At the heart of the NPPF is a presumption in favour of sustainable development. The NPPF directs local planning authorities to approve development proposals that accord with the development plan without delay.

6.4 The Government first published the National Planning Policy Guidance (NPPG) on 6th March 2014 (as amended). This planning practice guidance is a material consideration in the determination of planning applications and has been considered as part of this assessment of the Proposed Development considered within this section.

The Development Plan

6.5 The Development Plan for the site comprises the following:

- The London Plan (as amended 2016);
- Camden Local Plan (July 2017)

6.6 The Fitzrovia Area Action Plan (March 2014) is also a material consideration. This document sets out a coordinated vision for the area, linking with development policies.

Supplementary Planning Documents and Guidance

- 6.7 In addition to the policy documents above, regard has been given to the following supplementary planning documents and guidance:
- CPG1: Design (2015);
 - CPG2: Housing (2016);
 - CPG3: Sustainability (2015);
 - CPG4: Basements and lightwells (2015);
 - CPG6: Amenity (2011); and
 - CPG7: Transport (2011).
- 6.8 The site is within the Charlotte Street Conservation Area, and the Conservation Area Appraisal and Management Plan (2008) is also a key consideration.

7.0 PLANNING ASSESSMENT

7.1 This Section assesses the proposed development against the relevant planning policy tests, objectives and guidance set out at the national, regional and local level in respect of the following:

- Principle of Development
- Land Use
- Residential Quality
- Affordable Housing
- Design
- Residential Amenity
- Transport, Accessibility and Parking
- Sustainability
- Planning Obligations

Principle of development

7.2 The NPPF (March 2012) states that *‘At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking...’* it goes on to state *‘All plans should be based upon and contain the presumption in favour of sustainable development as their starting point, with clear priorities that will guide how the presumption should be applied locally.’*

7.3 The existing building is vacant, and has been for over 11 years, since all healthcare services were relocated to the new University College Hospital in 2005/2006. Arthur Stanley House is effectively a brownfield site. The redevelopment and optimisation of previously developed land is supported at all levels of planning policy.

7.4 The principle of the redevelopment of the site for an office-led mixed use scheme has been established with the extant consent, which confirms that the refurbishment and extension of the existing building and provision of a new build element to the rear is acceptable in the context of planning policy and the existing demand for commercial floorspace in this location.

Land Use

Loss of Class D1 Use

7.5 The current building is in Class D1 use. Camden Local Plan Policy C1e) states that the Council will protect existing health facilities in line with Policy C2 Community Facilities. Policy C2g) states: ‘*The Council will...*

ensure existing community facilities are retained recognising their benefit to the community, including protected groups, unless one of the following tests is met:

- i. a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users;*
- ii. the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area. Where it has been demonstrated to the Council’s satisfaction there is no reasonable prospect of a community use, then our preferred alternative will be the maximum viable amount of affordable housing;’*

7.6 All services previously provided at Arthur Stanley House were relocated in their entirety to the new University College Hospital (UCH) on Euston Road in 2005/2006. These services include orthopaedics; rheumatology; a hydrotherapy pool; and surgical administration services. As such, it is considered that the proposed loss of Class D1 floorspace would be compliant with Policy C2g) i) as replacement facilities which meet the need of the local population have been provided. As such, the principle of the loss of the healthcare use is acceptable.

7.7 The Council accepted that the former medical uses had been relocated to UCH in the Statement of Common Ground related to the Appeal by the previous owners.

Proposed Class B1 Use

7.8 The provision of office accommodation in this location accords with Policy E1: Economic Development, which states that the Council will direct new office development to Central London and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031. The proposed scheme provides a total of 6,463sqm (GIA) of office floorspace (both Class B1 and flexible Class B1/D1), which will make a valuable contribution towards the target set out in Policy E1.

7.9 Research undertaken by CBRE in December 2015 and updated in May 2017 (see **Appendix 1**) identifies a specific shortage of office stock in Fitzrovia. This finds that 51,877sqm of office accommodation has been lost between 2012 to Q1 2017 as a result of conversions of office space in Fitzrovia use to residential use.

7.10 The CBRE research considers all of the major office developments consented or under construction advising that there are no office developments in the pipeline due for completion in 2020 or 2021. It concludes that the evidence demonstrates there is both a short term and long term shortage of supply.

Proposed Class B1/Class D1 Use

7.11 The proposed scheme provides 524sqm (GIA) of flexible Class D1/B1 floorspace at ground and first floor which would be suitable for a GP Surgery. This unit has been included as a result of previous discussions with officers, which indicated that NHS England were looking for space to provide a GP Surgery in this area. The Applicant would be willing to explore whether NHS England would wish to lease this floorspace for a GP Surgery, with the provision that if these negotiations do not result in NHS England taking a lease, the floorspace can be used for Class B1 office accommodation.

7.12 The provision of this floorspace accords with both Policy C1, which supports of new or improved health facilities and Policy E1, which supports the provision of office floorspace in this location. The flexible nature of this use will ensure that it is able to be occupied for offices, should it not be required for health uses.

Proposed Mixed Use Development

7.13 The proposed scheme provides a total of 5,939sqm (GIA) office floorspace (including refurbished and new build), 524sqm (GIA) of flexible Class D1/B1 use and 946sqm (GIA) of residential floorspace.

7.14 The provision of an office-led mixed use scheme on this site has been established with the extant consent. The acceptance of the land use balance for the consented scheme was the main issue discussed within the Inspector's Report. The key points of this discussion are summarised below:

- Arthur Stanley House is identified within the Fitzrovia Area Action Plan for mixed use development. This principle is set out within the explanatory text to Principle 1 of the

FAAP which clearly states that, whilst thirteen of the opportunity sites are potentially able to contribute to the development of additional self-contained homes, these sites are not allocated exclusively for housing given the mixed-use character of the area. This conclusion is further confirmed when reading the report of the Inspector who examined the FAAP, who specifically inserted reference to Policy DP1 (mixed use policy of the replaced Development Policies Document) as applicable to the Arthur Stanley House opportunity site.

- The FAAP site allocation for housing supply included 16 residential units at Arthur Stanley House. The appeal scheme provided 12 units. The Inspector concluded that the delivery of 12 units was not at odds with the FAAP allocation, and that this reduced provision would not *'fatally undermine the ambition of the Area Action Plan to provide around 200 additional homes by 2025'*. Further discussion on the amount of housing provided within the proposed scheme is set out in the section below.
- Given the principle of a mixed use scheme on the site was considered acceptable, the scheme complied with the relevant planning policy (Policy DP1) which required 50% of any additional floorspace to be provided for housing.
- The Inspector's Report noted that although she found no conflict with the development plan, even if conflict were to have been found, the demand for office floorspace in this location was a material consideration which outweighed that conflict. This Appeal decision is only 9 months old and as demonstrated by the CBRE research, the shortage of office demand to which the Inspector refers continues to be a relevant material consideration.

7.15 While the planning policy context has now been updated with the adoption of the Camden Local Plan (July 2017), we believe that the conclusions drawn by the Inspector in the appeal decision for the consented scheme are still relevant to the proposed development. The provision of a mixed use scheme on this site is in accordance with the FAAP. The principle of an office-led scheme is also acceptable, and the provision of less than 16 units (as per the FAAP allocation) would not impact upon the Council's ability to meet and exceed the residential targets set out within current policy for the reasons set out below.

Housing Targets

7.16 With regard to housing targets, Policy H1 states that *‘The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.’* The supporting policy text states that *‘the housing trajectory indicates that there are sufficient identified sites in place to provide just over 17,100 additional homes from 2016/17 to 2030/31 and exceed our housing targets throughout the Plan period.’* This estimate is based on a list of allocated sites, included within the evidence base for the Local Plan. In the Fitzrovia Area a total of 142 dwellings are identified through allocated sites: Astor College (60 student housing units), Middlesex Hospital Annex (58 units), Arthur Stanley House (16 units) and 61-63 Tottenham Court Road (8 units). The forecast housing delivery statistics do not take account of unallocated (windfall) sites likely to come forward for residential development in addition to the allocated sites.

7.17 Fitzrovia itself is expected to provide 200 homes, as set out in the FAAP. The FAAP identifies the Arthur Stanley House site as suitable for providing 16 residential units.

Housing Delivery

7.18 When looking at the delivery of housing in Camden, the most recently published Annual Monitoring Report is for the 2014/15 period. The report states that *‘in 2014/15 a net total of 1,541 homes were completed, far exceeding the annual London Plan target of 665. Camden’s five-year supply of deliverable sites for housing amounts to 6,479 homes (or circa 1,296 homes per year). This exceeds the target of 4,285 homes for the period which is derived from the London Strategic Housing Land Availability Assessment’.* These figures indicate that there is a high level of housing supply being delivered annually within LB Camden, significantly in excess of the annual housing target set out in Policy H1.

7.19 The high level of housing supply in Camden is reflected in Fitzrovia, and the area has seen substantial new residential development in the last few years, including several larger schemes at Pearson Square and Rathbone Square. Many smaller schemes have also been delivered, including Derwent’s Corner House (73 Charlotte Street) and Dukelease’s Artisan (1 Goodge Street).

7.20 As set out in the Housing Targets section above, Fitzrovia is expected to provide 200 homes,. A review of the identified sites has been carried out, which concluded that the extant and current planning permissions allow for a total of 195 units (including 60 student housing units

at Astor College). In addition, there are 3 allocated sites where permissions have either expired without being implemented or proposals have not been brought forward. These are Tottenham Mews Day Hospital (where the consent has expired), and Network Building and 6-17 Tottenham Court Road which have not yet been brought forward for development. Within the FAAP, the Tottenham Mews Day Hospital is identified for medical/health use, the Network Building is identified for commercial uses and 6-17 Tottenham Court Road is identified for retail and housing.

- 7.21 For all identified sites, including the three listed above, the FAAP states that any additional non-residential floorspace should be matched by an equal addition to floorspace for permanent self-contained housing. It is clear that redevelopment of these sites in the future (which provides additional commercial floorspace) would result in additional residential provision. This policy requirement would also apply to any additional windfall (unallocated) sites coming forward within Fitzrovia.
- 7.22 The proposed scheme at Arthur Stanley House provides 9 residential units. By comparison to the consent there is a reduction of three units. The provision of 3 fewer units on the site would not fatally undermine the Council's aim to provide 200 additional homes within the Fitzrovia Area Action Plan, especially in the context of the three identified sites which are still to come forward for redevelopment, and additional windfall sites within the Fitzrovia area. It is clear from Policy H1, the data within the Annual Monitoring Report and the evidence prepared for the Local Plan that the Camden will significantly exceed its housing targets. In addition the proposed development will be required to make a payment in lieu contribution to affordable housing provision elsewhere in accordance with Policy H4. It is therefore considered that the provision of 9 residential units within the proposed scheme accords with Policy H1: maximising housing supply.

Housing within Mixed Use Schemes

- 7.23 Policy H2 requires housing to be provided as part of mixed use schemes. In the Central London Area the Council requires 50% of all additional floorspace to be self-contained housing on schemes involving more than 200sqm (GIA) of floorspace. The scheme provides and additional 915sqm (GIA) of office floorspace, and 946sqm (GIA) of residential floorspace, in accordance with Policy H2.

Affordable Housing

- 7.24 Policy H4 seeks to maximise the supply of affordable housing in the borough and expects a contribution to affordable housing from all developments that provide one or more additional homes. Part g) states that where developments have capacity for fewer than 10 additional dwellings the Council will accept payments in lieu of affordable housing. The payments are based on a sliding scale, starting at 2% for one home and increasing by 2% for each additional home. The scale is based upon the floorspace area, as opposed to unit numbers, and is based upon a capacity assessment calculated on the basis of one home per 100sqm (GIA). The total floorspace figure is rounded to the nearest 100sqm (GIA). The proposed scheme provides 946sqm (GIA) of floorspace, which results in a requirement for 18% affordable housing. The Applicant is content to provide a payment in lieu, in accordance with the requirements of Policy H4.

Residential quality

Dwelling mix

- 7.25 With regard to unit sizes, the dwelling sizes exceed the minimum unit size required by the London Plan Policy 3.5, Local Plan Policy H6 and Camden CPG2. Full details of the unit sizes are set out in the Design and Access Statement.
- 7.26 Policy H7 requires that all developments include a mix of large and small homes and contribute to the priorities set out in the Dwelling Size Priorities Table. This table confirms that there is a high priority for 2 and 3 bedroom market units, however the supporting text states that the Council acknowledges that there is a need and/or demand for dwellings of every size. The key aim is that every development should contribute to the creation of mixed communities by including a mix of small and large homes.
- 7.27 The proposed scheme provides a mix of 1 bed, 2 bed and 3 bed units. The proposals meet an identified market demand for 1 and 2 bed units in this location, and includes a single 3 bed unit. It considered that the proposed mix, generally accords with the Dwelling Size Priorities Table, and is acceptable when considering the location and context of the site. The supporting text for Policy H7 states that when considering the proportion of large homes appropriate within a specific development, the Council will take account of any features that make the

development suitable for children. These include the inclusion of playspace, direct access to open space and private amenity space and no direct access to a major road. Due to the constraints of the site the scheme at Arthur Stanley House is unable to make provision for playspace on site, On this basis we consider the provision of 1 family sized dwelling reasonable as a result of the site specific circumstances.

Quality of units

- 7.28 All the proposed residential units have been designed with regard to the residential design standards set out in CPG2 and the London Housing Design Guidelines. All apartments meet Lifetime Homes requirements and they also meet the required BRE daylighting criteria, as set out in the report by Point 2 Surveyors.

Wheelchair accessible housing

- 7.29 Policy H6 requires require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2) and 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3). The statement contained in the DAS confirms that the proposed scheme complies with this requirement.

Private amenity provision

- 7.30 CPG2 requires that all new dwellings should provide access to some form of private outdoor amenity space. The duplex units at lower ground floor and the unit at third floor benefit from large terraces. The total amenity provision is 33sqm. The units at first and second floor have Juliet balconies, which have been provided in response to officers' concerns about the nature of the mews. It was decided that projecting balconies would not be appropriate in this location, and as such Juliet balconies are proposed within these units.

Refuse and recycling

- 7.31 Refuse and recycling is stored within an identified location at basement level. The bins will be brought up to ground floor via the lift for collection. The storage area can hold a total of 720 litres of refuse and 1,680 litres of recycling, in accordance with CPG2 requirements.

Design and Heritage

- 7.32 Section 7 of the NPPF requires good design principles for new development and recognises good design *‘as a key aspect of sustainable development’* which *‘is indivisible from good planning, and should contribute positively to making places better for people’*.
- 7.33 The Proposed Development aligns with NPPF policy (Paragraph 58), which aims to ensure that development proposals:
- *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
 - *optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
 - *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
 - *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
 - *are visually attractive as a result of good architecture and appropriate landscaping”.*
- 7.34 The London Plan promotes development of the highest architectural quality. Policy 7.6 sets out the Mayor’s design guidance and requires developments to optimise the potential of sites and be designed in consideration of the local context. This is reiterated within Policy D1 of the Local Plan, which states that the Council will require development to respect local context and character, preserve or enhance the historic environment and integrates well with the surrounding streets and open spaces. Full details are provided within the Design and Access Statement, but in summary, the proposed scheme has been sensitively developed with reference to both the existing building on site and the surrounding area.
- 7.35 The existing façade will be refurbished with new windows and refurbished brickwork. The proposed façade reduces the depth and perceived weight of the cornice and emphasises the verticality of the building. The proposed office and residential entrances will activate the frontages on to Tottenham Street and Tottenham Mews, with increased glazing, allowing views into the entrance lobbies.

-
- 7.36 The existing loggia will be removed which will reduce the perception of height and allow the building to feel lower and more in keeping with its neighbours. The reconfigured accommodation at seventh floor has been sensitively designed, appears lightweight and is set back to minimise visibility in the views.
- 7.37 The new residential building design has been inspired by the industrial aesthetic of the neighbouring buildings, with exposed structure and high floor to ceiling heights.
- 7.38 Policy D2 seeks to preserve and enhance existing heritage assets. With regard to conservation areas, Policy D2 states that the Council will:
- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
 - f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
 - g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
 - h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.*
- 7.39 The site lies within Charlotte Street Conservation Area. This conservation area is a former residential area which now features a mix of uses which contributes to its character. It is based around a densely developed grid pattern of streets which gives a sense of enclosure, particularly on narrow streets. Terraced townhouses are the predominant building type, many with later shopfronts.
- 7.40 The existing building is identified as being a detractor to the character and appearance of the conservation area. The Conservation Area Appraisal notes that the site provides an opportunity for redevelopment through a replacement building which is more consistent with the character of the Charlotte Street Conservation Area.
- 7.41 There are some grade II listed buildings in the area surrounding the site, the closest being the listed 19th century terraced houses on Goodge Place and at nos. 16-22 Cleveland Street. There is a locally listed boundary marker mounted to the wall of no. 49 Tottenham Street, to the south-west of the site.
-

- 7.42 The submitted Townscape, Visual Impact and Heritage Assessment confirms that the proposals will enhance the local townscape, and in doing so, the significance of the Charlotte Street Conservation Area by bringing a boarded up vacant site back into use. In respect of urban design there are a number of significant benefits. The new active ground floor frontage will animate the street edge and benefit the local area while the new residential use on Tottenham Mews will similarly bring life to this side of the mews.
- 7.43 The scheme will provide an improved backdrop in the views along Goodge Place, enhancing the setting of the listed buildings along this street. It considered that the scale of the proposals in relation to the densely developed character of the townscape in the area around the site is such that the proposed scheme, in its relationship with the other surrounding listed buildings, will not be very noticeable, and in those cases where it is seen, will simply appear as part of the wider, varied townscape. The proposals are therefore considered to fully comply with Policy D2.

Residential amenity

- 7.44 Policy A1 states that the Council will:
- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
 - b. seek 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;*
 - c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*
 - d. require mitigation measures where necessary.*
- 7.45 The closest residential properties to the scheme are located at 73 - 75 Charlotte Street, 34-38 Tottenham Street and 4 Tottenham Mews, 6 Tottenham Mews, 27 Tottenham Street, 29 Tottenham Street, 31 Tottenham Street, 33-35 Tottenham Street, 37 Tottenham Street, and 39 Tottenham Street.
- 7.46 The proposed scheme has been designed to address potential impact upon residential amenity. The visual privacy of existing and future residential occupiers has been maintained by setting back the upper floors of the proposed rear extension and including privacy screens on the

terraces to ensure that office occupiers are not able to overlook neighbouring properties. The nature of the proposed use means that the office building will primarily be occupied during working hours (9am-6pm), when the majority of local residents are not in their homes.

- 7.47 The residential building faces on to Tottenham Mews, which already has buildings in residential use on the opposite side of the street. As this is the existing situation it is considered that the separation distance is acceptable in this instance.
- 7.48 With regard to daylight and sunlight, an assessment has been carried out by Point 2 Surveyors which demonstrates that the scheme achieves almost full compliance with the BRE guidelines. Where there are areas of non BRE compliance, this is reflective of the urban environment and commensurate with many schemes in London, and the alterations in light are considered very small in real terms. Full details are provided within the Point 2 Surveyors report.
- 7.49 With regard to noise, Policy A4 seeks to ensure noise and vibration is controlled and managed. The proposed uses on site are not anticipated to generate unacceptable noise and vibration impacts.
- 7.50 Policy A4 states that development should have regard to Camden's Noise and Vibration Thresholds. The Noise Impact Assessment prepared by Sandy Brown proposes noise limits for plant which will maintain an acceptable level of noise both for current and future occupiers. At this stage, no specific information is available on the plant selection, but the assessment sets out guidance for restricting noise emissions and it is suggested that this detail is secured by condition.
- 7.51 The draft Construction Management Plan sets out restricted hours of construction (8am-6pm Monday to Friday, 8am-1pm Saturday and no working on Sunday and Bank Holidays) to ensure minimal impact upon neighbouring properties. Full details of the measures to minimise noise impact from construction works will be set out in the final CMP which will be secured by condition/legal agreement.
- 7.52 With regard to air quality, Policy CC4 seeks to ensure that the impact of development on air quality is mitigated and exposure to poor air quality is reduced in the borough. An Air Quality Assessment has been prepared by Waterman, which identifies the potential impacts upon air quality arising from the development. The report confirms that the effects on local air quality during the construction phase will be insignificant if the proposed mitigation measures are followed. These measures will be secured within the Construction Management Plan (to be

required by the Section 106). The development does not include any parking spaces therefore there would be negligible traffic emissions associated with the occupation of the scheme. The use of small CHP to provide hot water for residents would also have an insignificant effect. The use of mechanical ventilation with filtration systems within both the office and residential buildings means that future occupiers will not be impacted by the existing levels of NO₂ and PM₁₀. In summary, the proposed scheme accords with the requirements of Policy CC4.

Transport and Parking

- 7.53 The Transport Assessment prepared by Crosby Transport Planning confirms that the site is has the highest accessibility rating PTAL 6b.

Servicing

- 7.54 The Transport Assessment confirms that it is not expected that the development will generate a significant number of service vehicle movements and certainly less than the previous medical/healthcare use (as was accepted for the approved scheme). Tottenham Mews will enable access for planned deliveries by smaller delivery vehicles and will enable service vehicles to access plant areas that will require occasional, infrequent servicing and maintenance.

Car and cycle parking

- 7.55 The proposed scheme is a car free development, which accords with Policy T2 of the Local Plan. The Applicant is happy to accept a restriction on parking permits within the Section 106, as required by Policy T2.
- 7.56 Policy T1 promotes cycling within the borough and requires schemes to provide accessible, secure cycle parking facilities exceeding the minimum standards within the London Plan and CPG7. The provision of facilities such as showers and lockers is also promoted.
- 7.57 The proposed scheme provides 72 cycle parking spaces for the commercial occupiers. The cycle parking is located within the lower ground floor. A separate stairway access with a wheeling ramp is provided from Tottenham Mews. Cyclists would also have the option to transport their bikes to the basement level via the office lifts (accessed from reception).

-
- 7.58 12 short stay parking spaces will be provided in the form of Sheffield stands located alongside the building on Tottenham Mews.
- 7.59 Residential cycle parking will be provided within a secure storage area in the ground floor of the building. There is a level difference of 1.5m between the cycle storage and street level. Cyclists can either use the internal stairwell with wheeling ramp, or the lift to travel between the street entrance and the cycle storage. A total of 14 spaces will be provided.
- 7.60 The proposed scheme provides secure, accessible cycle parking within the building, in accordance with London Plan standards for both the office and residential uses, therefore meeting the requirements of Policy T1.

Sustainability

- 7.61 Camden Local Plan Policy CC1 requires all developments to minimise the effects of climate change. Zero carbon development is promoted and the Council supports sensitive energy efficiency improvements to existing buildings. Policy CC2 requires all non-domestic developments of 500sqm of floorspace to achieve BREEAM excellent.
- 7.62 Sustainability issues relating to the site as a whole, the construction process, building design and operation have been considered and these are set out in detail in the Sustainability and Energy Statement. A full BREEAM Pre-Assessment has been carried out for the commercial uses and the score is currently 73.38%, which meets the requirement of BREEAM Excellent.
- 7.63 The energy statement assesses ‘Best Practice’, energy efficiency measures and renewable energy solutions for the proposed development. The inclusion of energy efficiency measures has been discussed to minimise on-site energy use compared to a building regulation compliant design. These include improved insulation levels, high specification glazing and energy efficient lighting and appliances.
- 7.64 The feasibility of incorporating low and zero carbon energy sources has also been assessed with PV installations on the flat roof of both the office block and residential block being proposed for the site.

- 7.65 SAP and SBEM calculations have been carried out to confirm the energy strategy delivers a high standard of fabric efficiency in conjunction with high efficiency heating systems to exceed Building Regulations 2013 Part L compliance for the commercial and residential units.
- 7.66 The proposed development will meet all relevant policies and requirements set out within the Camden Local Plan and the London Plan, the result of which is the provision of a resource efficient, sustainable development. The following standards are being proposed:

Residential Block

- A thermally efficient building fabric specification
- Accredited Construction Details for all applicable thermal bridges (and IG Hi-Therm lintels for the dwellings)
- Air-permeability of $\sim 4\text{m}^3/\text{hr}/\text{m}^2$
- A communal CHP system with HIU to each dwelling
- 2.7 kWp PV Array on the flat roof of the residential block
- AC units to provide comfort cooling
- Efficient lighting design to reduce power consumption
- Efficient water fittings to reduce indoor water demand
- Home Quality Mark 'level 3' compliance

Commercial Block

- A thermally efficient building fabric specification
- Accredited Construction Details for all applicable thermal bridges (and IG Hi-Therm lintels for the dwellings)
- Air-permeability of $\sim 5\text{m}^3/\text{hr}/\text{m}^2$
- VRV system to provide heating and cooling for offices
- 10.4kWp PV Array on the flat roof of plant room
- Efficient lighting design as per Figure 10
- Separate metering for all major commercial energy loads, which includes 'out-of-range' values (minimum of heating, cooling, lighting and ventilation)
- Efficient water fittings to reduce indoor water demand
- BREEAM 2014 'Excellent' compliance overall

7.67 A 19% improvement over Building Regulations Part L1A (dwellings) and 35% improvement over Part L2A (commercial) 2013 target emissions rates, compared to a compliant gas based solution, have been achieved by implementing the “be lean, be clean, be green” national energy policy methodology.

Planning obligations

7.68 The Applicant is committed to providing planning contributions in the form of S.106 obligations, in line with London Plan (Policies 6.5, 8.2 and 8.3) and CPG8: Planning Obligations.

7.69 It is anticipated that the S106 will include the following obligations:

- Affordable housing contribution
- Car free development for residential and commercial buildings
- Carbon offset contribution
- Construction Management Plan
- Decentralised energy contribution
- Employment and training contribution
- Energy efficiency and renewable energy plan
- GP surgery
- Local employment
- Local procurement
- Highways contribution
- Public open space contribution
- Sustainability plan
- Travel plan

8.0 CONCLUSIONS

- 8.1 This application seeks planning permission for the refurbishment of the existing building, reconfiguration of the seventh floor and the rear of the building and construction of a new build element to the rear facing Tottenham Mews to enable a change of use from health care (Class D1) to a mixed use development comprising office floorspace (Class B1), flexible office (Class B1/ health care (Class D1) floorspace at lower ground and ground floor level and 9 residential units (Class C3) fronting on to Tottenham Mews.
- 8.2 This planning application follows the grant of planning permission on appeal (2015/0391/P) (APP/X5210/W/15/3141159) in October 2016 which established the principle of an office-led mixed use scheme on the site. The current proposals comprise an alternative approach to the refurbishment of the site and provision of a mixed use scheme. It is considered that this approach is an improvement on the consented proposals in design terms and will sit more comfortably within the Charlotte Street Conservation Area. The proposed scheme is superior to the consented scheme in terms of external and internal design and efficiency.
- 8.3 The proposed scheme provides a total of 5,939sqm (GIA) office floorspace (including refurbished and new build), 524sqm (GIA) of flexible Class D1/B1 use and 946sqm (GIA) of residential floorspace.
- 8.4 The proposals will result in the regeneration of this vacant site and will meet an identified demand for high quality office accommodation within this location, resulting in job creation. The proposed development has been designed to attract creative occupiers seeking workspace in Fitzrovia, an area which currently has a constrained supply of office accommodation.
- 8.5 The scheme includes the provision of a flexible Class D1/Class B1 use, which can provide accommodation for a GP surgery if this is required.
- 8.6 The provision of 9 residential units and associated affordable housing payment will contribute towards Camden's housing targets, while the units themselves meet and exceed the residential design standards and policy requirements. The proposed design of the residential units meets the current market demand for modern loft style mews accommodation.

- 8.7 The development has been considered against national, regional and local policy and has been found to be fully compliant. It is therefore requested that planning permission be granted on this basis.

APPENDIX 1 – LETTER FROM CBRE

Michael Cassidy
Principal Planner
Development Management
London Borough of Camden
5 Pancras Road
London
N1C 4AG

22 May 2017

Dear Michael

OFFICE SUPPLY & DEMAND DYNAMICS IN FITZROVIA AND COMMENTARY ON ARTHUR STANLEY HOUSE

Further to CBRE's December 2015 review of the Fitzrovia office market, which formed part of the Arthur Stanley House Statement of Case planning appeal, I am writing to (i) provide a market update on the current supply and demand dynamics and (ii) examine the proposed development's relevance and suitability in Fitzrovia for the modern office occupier.

Office Supply & Demand Dynamics in Fitzrovia:

Supply:

There is a current shortage of office space in Fitzrovia. The depletion of stock is primarily the result of the conversion of office supply to residential use as house prices have surged in recent years. Between 2012 and the end Q1 2017, planning permission has been granted to convert 558,400 square feet of office space in Fitzrovia into residential use. This significant reduction in office supply is exacerbated by Fitzrovia's office stock level remaining relatively stable, increasing by only 9% since 1986 compared to the UK economy, which has grown by 92%. Whilst we are considering a finite land mass, the aforementioned statistics unequivocally illustrate an area with a distinct lack of office space for businesses to grow and evolve.

Looking forward, there is a total of 376,800 square feet of office space across four buildings under construction and due to complete before the end of 2017. However, due to the high levels of demand for space in Fitzrovia, all but 28,900 square feet of this total has been leased by the likes of Facebook at One Rathbone Square (242,800 square feet) and Capita at The Copyright Building (87,200 square feet).

Looking beyond 2017, there is only one building under construction in Fitzrovia (21,300 square feet at 42 Berners Street due in 2018) and a further two buildings undergoing demolition works totalling 323,300 square feet. The larger of these two buildings currently undergoing demolition, 80 Charlotte Street, is already 57% leased (174,300 square feet of the 308,000 total square feet) with completion expected by the end of 2019. The other building undergoing demolition works in Fitzrovia is 87/125 Cleveland Street (15,300 square feet). Wells & More and Oxford House may provide a combined total of 100,000 square feet of refurbished space in 2019, but there is no certainty on delivery. Currently, there are no developments due for completion in Fitzrovia in 2020 or 2021.

This evidence shows that in both the short and long term, the Fitzrovia office market is under-supplied.

Demand:

The recent take-up of new supply highlights the strong demand for office space in Fitzrovia and the scarcity of future stock from the development pipeline will only intensify this demand. CBRE sees the reduction in pipeline stock from occupiers pre-letting space continuing (save for unforeseeable macro headwinds), especially given the fact that TMT businesses, many of which consider Fitzrovia their spiritual home, have been the most active sector over the past three years and are currently the most active sector in terms of demand with over 30% of the 5.5 million square feet of lease events in the West End through the end 2021.

Fitzrovia is a high demand area for the following reasons:

- Superb transport connections, which will only improve with the opening of the Elizabeth Line.
- Central location straddling other notable areas of London including, Bloomsbury, Soho, Covent Garden and Euston/King' Cross, which draws a diverse occupier base.
- Preferred location for TMT and Creative businesses due not only to its geographic location but also its world class amenities (restaurants, bars, cafes, retail and hotels).
- Occupier genuine perception of the area as an “authentic” neighbourhood of London.

Arthur Stanley House:

Office space plays a vitally important role in evolving communities. If Fitzrovia is to continue to thrive as a “live / work /play” environment, then there must exist the right mix and balance of uses. It is therefore important that new developments like Arthur Stanley House are delivered to the market. It is important not only because of the aforementioned lack of supply and strong demand, but also because buildings like the proposed Arthur Stanley House offer space that will attract the best, most relevant companies that positively impact the local area. CBRE understands that in highly competitive markets, a company's ability to occupy the right space in the right neighbourhood significantly helps that firm win the war for talent and retain a best-in-class

workforce. In turn, these companies and employees form the fabric of the area, influence the desired amenities and shape the community.

Having reviewed the architect's plans, we are in a position to comment that Arthur Stanley House fulfils this brief and would be an extremely relevant addition to Fitzrovia for the following reasons:

- AHMM are the preeminent architects in designing creative office buildings and immediately set the right tone to an incoming occupier.
- The building's aesthetic is absolutely on trend, providing a modern warehouse appeal.
- The high ratio of lower ground floor space means that to a larger occupier, Arthur Stanley House presents a value proposition allowing more creative companies to afford the rental pricing.
- The floor-plate sizes will allow smaller businesses to settle in the immediate locale thus promoting a business eco-system of start-ups mixing with more mature companies.
- The linking staircase will encourage business collaboration and community.

I would be very happy to set up a meeting to discuss further.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Dan Hanmer', with a horizontal line underneath.

DAN HANMER
Head of West End and Midtown Leasing