

Planning Department
London Borough of Camden
Camden Town Hall
Judd Street
London
WC1H 9JE

Via Planning Portal
(PP-08035495)
let.001.RR.JM.30890001

29 July 2019

Dear Sir/Madam

**37 TAVISTOCK PLACE, LONDON WC1H 9SE – APPLICATION FOR
PLANNING PERMISSION FOR CHANGE OF USE**

On behalf of our client, Stay Generator, we enclose an application for the change of use of the frontage unit at 37 Tavistock Place from Sui Generis to A1 (Retail) for use as a coffee shop.

The following documents have been submitted in support of this application:

- Application forms, signed and dated;
- CIL Form;
- Site Location Plan (E19-717/1);
- Existing and Proposed Floorplan (190520_LON_reservationsOffice); and
- Proposed Moodboard (showing indicative design); and
- Proposed Interior Layout (indicative).

In respect of the planning application fee, £462 has been paid directly to the London Borough of Camden via the Planning Portal.

Background

The application site comprises an existing shopfront unit facing Tavistock Place. The shopfront consists half the frontage of a four-storey building at ground floor level. The other half of the frontage consists the route through into Compton Place, which accesses the Generator Hostel. The hostel is in separate demise to the rear. The shopfront is characterised by an attractive period wood and glass design, with an oblique double entrance door on the corner of Compton Place.

To the rear of the premises, through Compton Place is the Generator Hostel (Sui Generis). That site is specifically excluded from this proposal.

The site is located within the Bloomsbury Conservation Area, the Central London Area (Central Activities Zone) and a Viewing Corridor (Background Assessment Area). It is not in a defined Town Centre, but the Marchmont Street-Leigh Street Neighbourhood Centre is within 50 metres to the west.

There is a pedestrian entrance from oblique doors on the west side of the elevation.

The site has a PTAL Level 6b, the highest level of public transport accessibility. The site is within Flood Zone and not subject to flooding. The site is not listed, nor is it considered to be within the setting of any nearby listed buildings.

Planning History

The planning history of the site is varied. Of relevance to this application are:

Reference Number	Description of Development	Decision	Decision Date
9101102	Change of use from a travel agency to a pizza take-away and home delivery service.	Refused	14 January 1992
EN13/1049	Change of use complaint received. No breach found (15/11/2013) as the use had been ancillary to the hostel use of the Generator for in excess of ten years.	No breach found	15 November 2013
2016/4196/A	Display of internally illuminated (halo illuminated lettering) fascia sign and non-illuminated hanging sign.	Granted	19 September 2016

The planning application referenced above (ref: 9101102) demonstrates that the unit was formally in lawful use as a travel agent. The unit was therefore at that point in A1 (Retail) use, a use this application seeks to re-establish through the location of a coffee shop.

Pre-application advice

Informal pre-application discussions have taken place with LB Camden. These sought to establish the Council's opinion concerning the current lawful use of the unit.

Notwithstanding the site's earlier A1 use, and Generator's use for storage and lettings-related purposes, the Council considered that the site's lawful use is ancillary to the main hostel (i.e. sui generis use).

Stay Generator maintains that the unit is in separate demise to the hostel. While the unit was used to administer lettings for the hostel (and thus, Stay Generator contends, benefitted from an A2 use), the unit was not used on an “ancillary” basis to the wider hostel as it functioned on a separate basis.

However, given the Council's view (also rehearsed in the enforcement query EN13/1049 in the above planning history), this planning application is promoted on the basis of an existing use ancillary to the Sui Generis Hostel use of the Generator. This remains without prejudice to Generator's opinion that the site is in fact in A2 use.

Proposed change of use

This application proposes the change of use of the unit, consisting 17.5sqm floorspace, to an A1 (retail) use, to accommodate a coffee shop.

This application relates to the principle of the change of use only. No changes are being proposed to the shopfront or external appearance of the unit as part of this application.

Planning Policy

The Development Plan for LB Camden comprises:

- London Plan (2016); and
- Camden Local Plan (2017)

There is no existing or emerging Neighbourhood Plan in this part of Camden.

The emerging Draft London Plan is at an advanced stage. The Draft Plan has been submitted for Examination in January 2019 and closed in May 2019. As such, some weight can be afforded to emerging policies in that plan.

Once adopted, the Draft London Plan will replace the policy in the existing London plan.

“*Material considerations*” in the determination of the planning application would include:

- The National Planning Policy Framework (NPPF) (February 2019); and
- Camden Planning Guidance: Town Centres and Retail (2018)

Assessment

This section identifies the key planning issues and assesses the proposed development against the relevant planning policies, guidance and other material considerations.

Given this application relates to the change of use of the unit, the planning consideration are limited to:

- Principle of Development.

Principle of development

The Council's position is that the unit is used for activities ancillary to the adjacent Generator Hostel (i.e. sui generis use). This is at variance with generator's opinion that the unit has been used as an A2 use under a separate demise to manage the lettings for the hostel.

Notwithstanding this discrepancy, the site is designed as a commercial shopfront unit with an active frontage to the street. The site's planning history indicates a previous use of the site as a Travel Agent, an A1 use class.

The site is within the Central London Area (or Central Activities Zone or CAZ). The supporting text to Policy G1 (Locations of Growth) in Camden's Local Plan promises to:

"...support Central London as a focus for Camden's future growth in homes (including affordable housing), offices, shops, hotels and other uses and ensure adequate infrastructure, including transport, utilities and digital, is in place to support this growth." (para 2.52)

In addition, the Local Plan is clear that active frontages play a vital role in terms of the economic health and security of the Central London Area. Para 2.52 explains that the Council recognises:

"...the importance of appropriate active frontages in attracting footfall through spaces and increasing the sense of safety"

The unit in question is small (17.5sqm) and is proposed to be occupied by an independent coffee shop. This is strongly supported by Camden Local Plan Policy TC5 (Small and independent shops). The policy actively promotes the provision of small shop units, which are defined (para 9.51) as having a floorspace of less than 100sqm.

On a similar note, Policy TC3 (Shops outside centres) seeks to protect retail units outside defined centres. While this unit is not currently in retail use; its historic use was retail. As such, returning this unit to a retail use would chime with the spirit of this policy, which recognises the strong community and social roles that these standalone premises can play.

The London Plan also supports a range of commercial uses and activities throughout the CAZ. Policy 2.10 explains that the Mayor and the Boroughs should:

"...enhance and promote the unique international, national and Londonwide roles of the Central Activities Zone (CAZ), supporting the distinct offer of the Zone based

on a rich mix of local as well as strategic uses and forming the globally iconic core of one of the world's most attractive and competitive business locations."

The Draft London Plan (Draft Policy SD4) echoes this stance. It explains that retail uses are supported at various locations within the CAZ, including locally-orientated uses outside defined frontages.

"The vitality, viability, adaptation and diversification of the international shopping and leisure destinations of the West End (including Oxford Street, Regent Street, Bond Street and the wider West End Retail and Leisure Special Policy Area) and Knightsbridge together with other CAZ retail clusters including locally-oriented retail and related uses should be supported".

Thus, both existing and emerging policies support commercial uses (including locally-orientated retail) in this location. The proposal would bring back into active use a unit designed for retail occupation and contribute significantly to the economy of the local area, encouraging footfall into the area.

Furthermore, while the proposal is not in a defined centre, it consists of one "Main Town Centre" use (NPPF – Glossary) (i.e. a hostel) changing to another (i.e. retail). No net additional floorspace is being created. In addition, the Marchmont Street-Leigh Street neighbourhood Centre (a defined centre) is less than 50 metres from the site. Establishing a busy, attractive use on the premises will provide additional support to the vitality and viability of that centre.

Summary

The proposals would allow the change of use of an under used unit to a coffee shop (A1). The proposal would create an active use within a unit in historic retail use in this area. It will support footfall and the vitality and viability of the Central Activities Zone (CAZ) and the adjacent Neighbourhood Centre. It would strongly accord with the Local Plan's aspiration in terms of supporting small and independent retailers, including outside defined centres. As such the application should be supported.

We trust you have all the necessary material to validate the application. Should you have any further queries please contact me.

Many thanks.

Yours faithfully,

A handwritten signature in black ink that reads "Richard Robeson". The signature is written in a cursive style and is positioned above a horizontal line.

Richard Robeson