

PLANNING STATEMENT

**CHANGE OF USE TO PROVIDE NEW SHORT-TERM LET UNITS AT 2
TOWER COURT, LONDON WC2H 9TW**



6 New Bridge Street
London EC4V 6AB

T: 020 7489 0213

F: 020 7248 4743

E: info@dwdllp.com

W: dwdllp.com

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1.0 INTRODUCTION

1.1.1 This Planning Statement (“**Statement**”) accompanies an application for planning permission at 2 Tower Court, London, WC2H 9TW (“**Site / Property**”) for the “**Proposed Development**”:

“Change of use of building from ancillary office (Eg) to provide 2x self-contained short term let flats (Use Class Sui Generis) including demolition of conservatory and opening up of lightwell, lowering of basement slab, creation of new entrances and replacement of windows”

1.2 The application is submitted to the London Borough of Camden (“**Council**”) on behalf of Tower Street Limited (“**Applicant**”) under the Town and Country Planning Act 1990. The British Retail Consortium (“**BRC**”) is the parent company of the Applicant, whose members include over 170 major retail companies plus thousands of smaller independent retailers.

1.3 This Statement explains how the Proposed Development will provide two new short term let flats at the Site to be used in association with the operation of the BRC offices at 22 Tower Street in accordance with the relevant national planning policy, the development plan and other material considerations.

1.4 This Statement should be read in conjunction with the following documents submitted:

- Application Form;
- Existing and Proposed drawings (prepared by Claridge Architects, see drawing register dated 15/01/2021);
- Design and Access statement (prepared by Claridge Architects dated 15/01/2021);
- Heritage Impact Assessment (prepared by EDP Ltd reference edp5207_r002a);
- Underpinning Statement and Plan (ref: 2032-01_AH/SC)
- Arboricultural Impact Assessment (“**AIA**”) (ref: HWA10230.01_AP111)
- Written Scheme of Investigation for an Archaeological Watching Brief (“**WSI**”) (ref: JAC26258)
- Marketing campaign summary letter (prod. By Colliers International dated 01 August 2019)
- Marketing particulars for 22 Tower St. & 2 Tower Court
- CIL Form; and
- Location Plan

2.0 SITE AND SURROUNDINGS

- 2.1 The Site is located in the south-east of the Borough on a small plot measuring approximately 0.058ha bounded by the four-storey mixed use terrace along Earlham Street to the north, part 5-storey, part 6-storey 22 Tower Street to the south, and to the east by the pedestrianised alleyway at Tower Court which feeds onto Tower Street, Monmouth Street and Earlham Street.
- 2.2 2 Tower Court is a three-storey Victorian building which is characterised by its front projecting gable and decorative red brick banding around the window arches and quoins. 2 Tower Court also features an unsympathetic uPVC 1980s conservatory which has no architectural merit and modern security railings are secured across the upper floor windows of the building. The existing uPVC conservatory conceals a former lightwell which was extended as part of works to enlarge the basement room.
- 2.3 The existing building has a lawful use as an Office (Use Class Eg), and was used as entertainment and relaxation space linked to the office use at the adjacent 22 Tower Street, prior to the previous occupants vacating the Site in 2013.
- 2.4 The Site is located within Sub Area One of the Seven Dials Conservation Area, and is sited adjacent to the rear exterior space of the Grade II listed 22 Tower Street. Sub Area One of the Conservation Area as defined by the Seven Dials (Covent Garden) Conservation Area Statement is characterised by the distinctive grouping of commercial buildings in close proximity to domestic terraces, with residential uses considered an important facet of the special quality of the Conservation Area. The Site is also located in an Archaeological Priority Area.
- 2.5 The Site is located at the heart of London in close proximity to a number of underground stations and is also served by a number of local bus services. The Site has a Public Transport Accessibility Level (“**PTAL**”) of 6b (Excellent) on a scale of 0 to 6b, where 1 is poor and 6b is excellent.

3.0 THE PROPOSED DEVELOPMENT

- 3.1 The Proposed Development is for the provision of two short-term let flats to be used in association with the BRC head office at 22 Tower Street and internal refurbishment and alterations at the Site. The two new units consist of 2x 1-bed 2-person duplexes accommodated within the existing fabric of the building.
- 3.2 The building will be converted into a short-term visitor accommodation use from its existing lawful use as offices (Eg), given the building is no longer viable as independent office space. The Proposed Development is intended to be used as residential accommodation for short term lets. The accommodation will be used by BRC members visiting London on business from the UK and abroad, however it is anticipated that members would not occupy the accommodation full-time so the units will also be let out to members of the public to ensure its use is optimised.
- 3.3 The Proposed Development would also involve the removal of the existing unsympathetic conservatory to facilitate a new lightwell to serve the basement floor of the duplex unit.
- 3.4 The internal refurbishments consist of the replacement of the unoriginal staircases throughout the building, staircase and an internal partition on the first floor in addition to the ground and first floor chimney breasts. The external security bars on the window will also be removed and the existing roof tiles will be replaced where needed. All the proposed internal and external alterations were approved under planning application LPA reference 2019/2525/P and listed building consent 2019/2865/L.
- 3.5 The Proposed Development will be 'car-free' with cycle parking and waste and refuse facilities provided in a secured location within the Site.
- 3.6 A detailed assessment of how the Proposed Development conforms to the policies contained in the adopted development plan is contained within Section 6 of this Statement.

4.0 PLANNING HISTORY

4.1 The relevant planning history of the Site has been tabulated below.

Reference	Address	Description	Status
2020/2021/P	2 Tower Court, London, WC2H 9NU	Details required by conditions 4 (Details of materials) and 7 (cycle storage) pursuant to planning permission 2019/2525/P	Under consideration. Submitted 19/08/2020
2020/2021/P		Details of conditions 6 (tree protection measure) and condition 9 (Archaeology - Written Scheme of Investigation) pursuant to planning permission 2019/2525/P dated 13/01/2020	Granted 14/08/2020
2019/2525/P & 2019/2865/L		Change of use of building from ancillary office (B1a) to provide 2x self-contained flats (2x 1bed, 2 person - C3) including demolition of conservatory and opening up of lightwell, lowering of basement slab, creation of new entrances and replacement of windows	Granted. 13/01/2020
2008/0926/P		Erection of single storey rear extension to office, following demolition of existing conservatory.	Granted. 27/02/2008
8800250		Approval of details of design of conservatory pursuant to additional condition 02 of the planning permission (PL/8703525/R1) dated 20th January 1988.	Granted/Approval of details. 03/06/1988
8870099		Approval of details of design of conservatory pursuant to additional condition 03 of listed building consent (Reg. No. 8770319(R1)) dated 20th January 1988.	Granted/Approval of details (Listed building). 03/06/1988
8770319	School House 2 Tower Court WC2	Alterations to the building including the excavation of part of the basement area in the yard to form a sunken patio area and the erection of a glazed conservatory and the erection of a brick boundary wall as shown on drawing numbers 1542/2C & 1487/106B revised on 30th November 1987.	Grant Listed Building or Conservation Area Consent
8703525	<i>Same as above</i>	Alterations to the building including the excavation of part of the basement in the yard to form a sunken patio area the erection of a glazed conservatory and the erection of a brick boundary wall as shown on drawing numbers 1542/2C & 1487/106B revised on 30th November 1987.	Grant Full or Outline Permission with conditions
2020/0957/L	22 Tower Street, London, WC2H 9NS	Internal and external alterations, replacement of rear conservatory with single storey rear extension and construction of two storey front and side extension (Resubmission to correct drawing numbers on previous approved application 2019/0737/L)	Granted 22/04/2020

2020/1157		Non-material amendment to vary condition 3 (approved drawings) of planning permission reference 2019/0004/P dated 11/12/2020 (Refurbishment of existing B1a (office) building, erection of two storey front and side extension, internal and external alterations and replacement of rear conservatory with a single storey rear extension); CHANGES ARE to amend previously approved drawing numbers	Granted 22/04/2020
2019/0004/P & 2019/0737/L		Refurbishment of existing B1a (office) building, erection of two storey front and side extension, internal and external alterations and replacement of rear conservatory with a single storey rear extension	Granted 11/02/2020
2014/3425/P		Change of use and conversion from offices (B1) to 22 residential units (C3) comprising 3 x studio units, 12 x one-bed units, 5 x two-bed units and 2 x three-bed unit including removal of exiting orangery and replacement with new two storey structure.	Granted Subject to a Section 106 Legal Agreement

The Site

- 4.2 An application for planning permission and listed building consent for “*Change of use of building from ancillary office (B1a) to provide 2x self-contained flats (2x 1bed, 2 person - C3)*”, including associated operational development required to facilitate the subdivision of the Property into two residential units was approved on 13th January 2020 (LPA refs: 2019/2525/P & 2019/2865/L) (“**2020 Application**”).
- 4.3 The principle of a change of use of the Property to residential from its lawful Eg office use was accepted by the Council in the 2020 Application and it was demonstrated that after extensive marketing undertaken by Colliers the Site was and is not considered viable for continued use as a standalone office unit.
- 4.4 In addition to the change of use, demolition of the existing conservatory to restore the pre-existing light well was approved along with the fenestration alterations, a lowering of the basement slab and internal alterations which facilitated the provision of two units at the Property.
- 4.5 Subsequent to the approval of the 2020 Application, a discharge of condition application has been approved by the Council (LPA ref: 2020/2021/P) on 14th August 2020, pertaining to further details on tree protection measures and an archaeological scheme of investigation for the scheme. A second discharge of condition application relating to details of the approved windows and doors

and cycle storage has also been submitted (LPA ref: 2020/2021/P), which is currently under consideration by the Council.

- 4.6 The Proposed Development retains all of the operational development aspects of the 2020 Application with a divergence occurring with the intended end use of the Property which will be units for short term let to support the operations of BRC. The Proposed Development will also include the details submitted and approved under the first discharge of condition application for the 2020 Application and the details submitted in the second application which is currently under consideration.
- 4.7 The 2008 application reference 2008/0926/P for the erection of a single storey rear extension to the office also involved the removal of the existing uPVC conservatory. Whilst this consent was not implemented, in describing the uPVC conservatory in the delegated report officers commented that *“the existing uPVC conservatory does not relate well to the site, the existing building is considered to be an ‘of-the-shelf’ design which has been poorly considered for a Conservation Area”*.
- 4.8 In place of the conservatory the Council were accepting of a replacement contemporary structure, which was considered to not have a detrimental impact on the wider Conservation Area, despite retaining the visual prominence of the uPVC conservatory.

22 Tower Street

- 4.9 Applications for planning and listed building consent were submitted on behalf of BRC to undertake a refurbishment of 22 Tower Street, including the addition of two extension to the building (LPA refs: 2019/0004/P & 2019/0737/L). These applications, approved on the 11th February 2020 are intended facilitate modern office accommodation for BRC whilst preserving the significance of the designated heritage asset.

The Proposed Development would be linked to 22 Tower Street and the accommodation will be used by BRC members travelling to London on business. To ensure the properties are not vacant for extended period of time and optimise their use, when they are not in use by BRC members they will be let out to the general public

5.0 PLANNING POLICY

5.1 In accordance with Section 38(6) of the Planning & Compulsory Purchase Act (2004), applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise. Under Section 38(2), the development plan for any area within Greater London comprises the Spatial Development Strategy and the development plan documents (taken as a whole) which have been adopted and approved in relation to that area. The statutory development plan for the Unit comprises of the following:

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

5.2 The mayor has formally approved a new London Plan, the Publication London Plan December 2020 is expected to be adopted in Q1 2021, and address a number of Directions issued by the Secretary of State for Housing, Communities and Local Government (“**Secretary of State**”), on the Draft Intend to Publish London Plan 2019. The Directions were issued on the 13th March 2020., with the Secretary of State subsequently following this up with additional directions and an agreed approach to the March 2020 directives in a letter to the Mayor of London on 10th December 2020.

5.3 The purpose of the Directions is for modifications of the draft Intend to Publish London Plan to be undertaken, to address inconsistencies with national policy and revisions to the draft Intend to Publish London Plan’s approach to housing delivery. The Proposed Development has not been assessed against the polices in the London Plan 2016 due to the imminent adoption of the Publication London Plan.

5.4 In addition to the statutory development plan documents the following documents are relevant material considerations to the Proposed Development:

- National Planning Policy Framework (2019)
- Camden Planning Guidance: Design (2019)
- Camden Planning Guidance: Employment sites and business premises (2018)
- Camden Planning Guidance: Interim Housing CPG (2018)
- Camden Planning Guidance: Basements (2018)
- Camden Planning Guidance: Transport (2018)
- Camden Planning Guidance: Public Open Space (2018)

- Seven Dials (Covent Garden) Conservation Area Statement

Publication London Plan 2020 (“PLP”)

5.5 The PLP Policies which are considered relevant to the Proposed Development are listed below taking into account the relevant Directions by the Secretary of State:

D1 – ‘London’s form, character and capacity for growth’

D4 – ‘Delivering good design’

D6 – ‘Housing quality and standards’

E1 – ‘Offices’

E10 – ‘Visitor Infrastructure’

HC1 – ‘Heritage conservation and growth’

T5 – ‘Cycling’

T6 – ‘Car parking’

Camden Local Plan (2017) (“Local Plan”)

5.6 The Local Plan policies which are considered relevant to the Proposed Development are listed below:

E2 – ‘Employment premises and sites’

E3 – ‘Tourism’

A2 – ‘Open space’

A5 – ‘Basements’

D1 – ‘Design’

D2 – ‘Heritage’

T1 – ‘Prioritising walking, cycling and public transport’

T2 – ‘Parking and car-free development’

CC5 – ‘Waste’

6.0 PLANNING ASSESSMENT

6.1 The main issues relating to the Proposed Development are:

- Principle of development
- Impact on the Grade II Listed Building and its setting
- Quality of accommodation and its design
- Highways and refuse impacts
- Trees and Archaeology

Principle of Development

Publication London Plan

6.2 PLP Policy E10 'Visitor Accommodation' states "London's visitor economy should be strengthened by enhancing and extending its inclusive access, legibility, visitor experience and management and supporting infrastructure". PLP Policy E10 continues, "A sufficient supply and range of serviced accommodation should be maintained". Paragraph 6.10.4 expands on this stating, "Improving the availability of accessible serviced accommodation is vital to ensuring that as many visitors as possible can stay in London and experience its visitor attractions and business offer".

6.3 PLP Policy E1 'Offices' in managing London's changing office market asserts, "Development proposals should support the redevelopment, intensification and change of use of surplus office space to other uses".

Camden Local Plan

6.4 Local Plan Policy E3 'Tourism' states "we will expect new, large-scale tourism development and visitor accommodation to be located in Central London". Local Plan paragraph 5.56 acknowledges that "Visitor numbers to London are expected to continue to increase, creating demand for more hotels and other overnight accommodation, particularly in Central London".

6.5 Policy E2 'Employment premises and sites' states the Council "will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction, the site or building is no longer suitable for its existing business use; and that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time".

- 6.6 When considering the existing use of the building, it can be demonstrated that 2 Tower Street is a long-term vacant unit in a state of disrepair which would not be suitable for continued use as office accommodation, with the alternative visitor accommodation proposed, compatible with the Use Class Eg office use at 22 Tower Street and supported in the PLP and Local Plan given the Site's Central London location.
- 6.7 Policy E2 explanatory paragraph 5.37 'Proposals involving loss of business premises and sites' states that in considering the acceptability of the proposed loss of employment floorspace the Council will consider *"the suitability of the location for any business use; whether the premises are in a reasonable condition to allow the use to continue; the range of unit sizes it provides, particularly suitability for small businesses; and whether the business use is well related to nearby land uses"*. The Policy states that further guidance is contained in the 'Employment sites and business premises SPD 2018' ("**Employment SPD**").
- 6.8 Paragraph 9 of the Employment SPD explains that *"The Council recognises that not all existing employment premises will be able to offer the same standards of accommodation as new build premises"* and the Policy goes on to state *"that there is potential for business use to continue in existing employment premises which are in reasonable but not perfect condition"*.
- 6.9 In the case of 2 Tower Court, there is no realistic prospect of the property being used for office use. Marketing history and particulars supplied by Colliers (ref: 2 tower court (002), dated 01 August 2019), which was provided in support of the 2020 Application, demonstrates that after extensive marketing over a period greater than 2 years no office occupiers were interested in the Property due to the *"floor plate configuration and planning and refurbishment challenges posed by the Grade II Listing status"*. No offers to let or buy were received from office use occupiers or investors.
- 6.10 Therefore, in response to Employment SPD paragraph 9, the Site is neither in a *"reasonable"* condition nor does it meet the threshold to be considered *"not perfect condition"*; rather the Site is incapable of being used as effective employment generating floorspace. The principle of the acceptability of the loss of employment floorspace is therefore established and has been accepted as such in the Council's assessment and determination of the 2020 Application.
- 6.11 The Proposed Development is intended to be used as residential accommodation for short term lets. The accommodation will be used by BRC members visiting London on business from the UK and abroad, however it is anticipated that members would not occupy the accommodation full-time so the units will also be let out to members of the public. In providing visitor accommodation

the Development would also adhere to the strategic aims of the PLP in providing additional short-term serviced accommodation in Central London which allows visitors to experience London's business and visitor offerings. It would also contribute to meeting the ascribed increase in demand for visitor accommodation in central London in line with Local Plan Policy E3.

- 6.12 In considering the provisions outlined in both iterations of the London Plan and the Local Plan, it is considered that the Proposed Development would provide additional visitor accommodation to meet an ascribed need for London's business offering and would result in the repurposing of a vacant, underutilised Site to the benefit of the wider locality.

Impact on the Grade II Listed Building and its setting

- 6.13 22 Tower Street (Historic England list entry no. 1379048) is a Grade II Listed former 19th century board school which is notable for its elaborate architectural features along the principal Tower Street elevation, including the entrance doorcase, relief panels and overall detailing.
- 6.14 The significance of that building lies with its architectural and historical interest. Its architectural interest relates to the fabric of the exterior of the building, as evidenced by the detail in the listing citation by Historic England. The historical interest in 22 Tower Street relates to its use as a school for the under-privileged in the 19th century.
- 6.15 2 Tower Court is also Grade II Listed by curtilage due to its association with 22 Tower Street.
- 6.16 5-8 and 10 Tower Court (Historic England list entries no. 1379041 and 1379043) are Grade II listed buildings which adjoin the south-east of the site, on the opposite side of Tower Court. These four buildings are notable for having redundant commercial facades, whilst being in residential use. This marriage between commercial and residential is a characteristic of this sub area of the Seven Dials Conservation Area. The primary interest with these properties is in their architectural merit and the design features of their façades.
- 6.17 When considering the impact that the Proposed Development has on the significance of the heritage asset and the setting of the Grade II listed Tower Court and the terrace at 5-8 and 10 Tower Court, the National Planning Policy Framework (2019) ("**NPPF**") Paragraphs 192, 193, 195 and 200 are particularly important. These state as follows:

- **Paragraph 192:** *"In determining planning applications, local planning authorities should take account of...the desirability of new development making a positive contribution to local character and distinctiveness."*

- **Paragraph 193:** *“When considering the impact of the proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed through...development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.”*
- **Paragraph 195:** *“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 200:** *“Local planning authorities should look for opportunities for new development...within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance should be treated favourably.”*

6.18 S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that *“in the exercise, with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”*.

6.19 PLP Policy HC1 ‘Heritage conservation and growth’ states *“development affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings”*.

6.20 Local Policy D2 ‘Heritage’ confers that *“the Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss”*. Policy D2 continues, *“the council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area, [and] makes a positive contribution to the character or appearance of a conservation area”*.

6.21 In support of the Proposed Development, and assessing its impact on the significance of the heritage asset and the character and appearance of the Seven Dials Conservation Area, the Heritage Impact Assessment (“**HIA**”) prepared by EDP Ltd for 2020 Application is again presented to assess these impacts.

6.22 The HIA states that the existing building at 2 Tower Court currently makes a negative contribution to the significance of the Grade II listed buildings, and the character and appearance of the

Conservation Area, by reason of the uPVC 1980s conservatory and its prominence within the Tower Court alleyway.

- 6.23 In removing this poor-quality element, it is considered that the Proposed Development would represent an enhancement of the existing experience of both listed buildings whilst the lightwell would be a reinstatement of an original feature of the property lost in the development of the existing conservatory.
- 6.24 The acceptability of the external alterations has been established by the 2020 Application and would have no significant impact on nearby heritage assets or the character and appearance of the Conservation Area. In addition, the principle of contemporary design features on the ground floor was established with the application granted in 2008.
- 6.25 Minor alterations are proposed internally within 2 Tower Court which are required to facilitate the arrangement of the duplex units. These alterations would not alter the fabric of the building, would retain the general arrangement of the rooms and given the nature of internal partitions would not greatly detract from the overall significance of the building. It is noted that there are little to no surviving heritage features inside 2 Tower Court.
- 6.26 During the determination period of the 2020 Application the access arrangements to the Property were amended to omit a second external access to the ground floor flat, which was instead accommodated internally. In approving the 2020 Application, the Council accepted this arrangement and the minor internal alterations, and concluded that it would have no impact on the significance of the heritage asset.
- 6.27 The HIA concludes that when assessing the impact of the Proposed Development *“there would be an enhancement to the building through the demolition of the 1980s conservatory. Fabric alterations are minimal, and the proposed new entrance is in keeping with the overall style of the building. Overall, it is considered that the alterations would cause ‘no harm’ to the building and secures the long-term future of the building and its optimum viable use”*.
- 6.28 In addition, *“the proposals are considered to represent an enhancement to the existing character and appearance of the conservation area, due to the removal of the poor-quality conservatory. Similarly, this is considered to enhance the experience of the adjacent listed buildings”*.

Design, Quality and Space Standards

Design

- 6.29 Local Plan Policy D1 'Design' outlines the Council's overarching design principles for development including ensuring that development respects local context and character, comprises details and materials that are of high quality and complement the local character, and for housing, provides a high standard of accommodation.
- 6.30 As outlined in the accompanying Design and Access Statement ("**DAS**"), a comprehensive design analysis incorporating materiality, local architectural character study and façade composition has been undertaken to inform the design of the Proposed Development and ensure it complements the architectural language of the locality including the adjacent heritage assets (see pages 18-20 of the DAS prepared by Claridge Architects).
- 6.31 The fenestration to be introduced along the ground floor would take inspiration from architectural interventions which introduce contemporary elements to existing traditional buildings within an urban setting. The proposed reinstated lightwell would also not be visible from the public alleyway and would therefore be sensitively located to ensure it has negligible impact on the visual amenity of the locality in adherence to Local Plan Policy A5 'Basements' and Camden's Planning Guidance: Basements.
- 6.32 The security window bars along the eastern and southern elevations of the building are also proposed to be removed which would return the windows to their original state and would be a further enhancement to the building, given the existing windows visibility.
- 6.33 London Plan Housing Supplementary Planning Guidance (2016) ("**Housing SPG**") Standard 28 'Privacy' provides a guide of between 18-21m between habitable room windows to ensure dwellings are provided with an adequate level of privacy in relation to neighbouring properties. The southern-facing rear windows which would have a residential use are located between 12-20m from the upper floor windows at the properties at nos. 5-10 Tower Court at an oblique angle, whilst mature trees along the north-eastern boundary of 22 Tower Street would provide a degree of screening in the summer months.
- 6.34 It is therefore considered that whilst the removal of the conservatory has the most benefits to the visual amenity of the locality, the other proposed elements would also respect local context and character, whilst the materiality of the Proposed Development would benefit the siting of the building

in close proximity to a number of heritage assets. The design of the Proposed Development was also approved by the Council in determining the 2020 Application.

Quality and Space Standards

- 6.35 Whilst the Proposed Development is classed as visitor accommodation, the two units which will be the subject of short-term lets have been designed to retain the standard of residential accommodation approved under the 2020 Application in terms of size and technical specifications. This section thus deals with this assessment of the units accordingly.
- 6.36 PLP Policy D4 ‘Housing quality and standards’ which states that housing development should be of high-quality design, and provide adequately-sized rooms, with comfortable, convenient and efficient room layouts, which are functional and fit for purpose.
- 6.37 Camden Planning Guidance on Amenity and Interim Housing outlines the principles for housing development in the Borough which are applicable to all types of self-contained houses and flats including those create through conversions and changes of use.
- 6.38 Underpinning the principles of the residential quality policies in the London Plan and the Council’s planning guidance are the minimum internal space standards as outlined in the Technical Housing Standards¹. A schedule of the dwelling sizes for the proposed new units are outlined below in Table 1 and as evidenced both units in the Proposed Development would exceed the ascribed minimum standards.

Table 1: Proposed Dwelling Sizes

Unit	Required (sq.m.)	Proposal (sq.m.)	+/- (%)
Unit 01 (1b2p)	50	50.6	101
Unit 02 (1b2p)	50	55.2	110

- 6.39 In addition, the Technical Housing Standards requires double rooms to have a Gross Internal Area (“GIA”) of 11.5sq.m. All newly proposed dwellings would also adhere to these technical specifications.
- 6.40 In addition to the Technical Housing Standards, the Proposed Development would also adhere to the general principles for new homes outlined in Camden Planning Guidance: Interim Housing. The

¹ Department of Communities and Local Government - Technical housing standards - nationally described space standards March 2015

two-living room/kitchens/dining rooms have been stacked between the ground and first floors of the building to avoid undue noise and general disturbance between the two units. Both units would benefit from satisfactory outlook, light and ventilation from habitable rooms (which have south-facing fenestration), which is particularly pertinent given the tight urban grain in which the Site is situated.

Parking and Refuse

Vehicle Parking

- 6.41 Local Plan Policy T2 ‘Parking and car-free development’ states that the Council will limit the availability of parking and require that all new development in the borough be ‘car-free’.
- 6.42 There is a clear strategic objective to reduce the provision of, and dependency upon car ownership, whilst promoting more sustainable modes of transport particularly in areas where there is good access to public transport.
- 6.43 The Site has a PTAL rating of 6b, is located in close proximity to local bus services and a number of underground stations.
- 6.44 The Proposed Development would be car-free which would accord with the aims and objectives of Local Plan Policy T2, in contributing to a modal shift by prospective occupants towards more sustainable forms of transport.

Cycle Parking

- 6.45 Table 6.3 of the London Plan prescribes the minimum levels of cycle parking that should be provided at new development. Table 6.3 states that 1 cycle parking space should be provided for 1-bedroom dwellings and 2 spaces should be provided for all other dwellings.
- 6.46 The Proposed Development is therefore required to provide a minimum of 2 cycle storage spaces for the new units. These will be provided within a secured area accessed from the communal external area in front of the Property in line with the London Plan Housing SPG Standard 21 ‘Cycle storage’.

Refuse

- 6.47 Local Plan Policy CC5 ‘Waste’ states that development should, *“include facilities for the storage and collection of waste and recycling”*. Camden’s Planning Guidance: Design, outlines specific waste management criteria for new housing development. Paragraph 8.10 states that the Council offers collection services for the following minimum volumes per dwelling per week:

- 120 litres of bin, box or sack volume for general waste or 'refuse'
- 140 litres of mixed dry recycling
- 23 litres of food waste

6.48 Camden's Planning Guidance: Design also requires buildings to have off-street collection areas at ground level, residents should not have to carry waste sacks more than 15m or manually navigate flights of steps whilst external storage areas should be secure.

6.49 Refuse is stored in a secured bin store integrated between a privacy screen and external wall, 7.5m from the front doors of the proposed units which accommodates 2x 27L food waste bins. It is therefore considered that there is sufficient provision for waste storage, in accordance with Camden's Planning Guidance on design of waste storage.

Basement Development

6.50 As part of the 2020 Application a covering letter was provided by Heyne Tillett Steel (ref: 2032-01) which states that the basement underpinning works will be carried out by a suitably qualified contractor, whilst the design and method "will minimise the impact on any nearby structures or infrastructure during and after the proposed works for associated movements to be considered as negligible". The letter is also supported by a drawing (ref: SK013) which demonstrates this.

6.51 Given the approval of these documents as part of the 2020 Application and the retained basement design from the approved proposal, it is considered that the Proposed Development would adhere to Local Plan Policy A5 'Basements'.

Trees

6.52 An AIA for the 2020 Application was approved on 14th August 2020 as a discharged condition. The AIA contains clear recommendations for best practice in the retention and protection of the trees on the adjacent site at 22 Tower Street, which the Development would not impact. Our development would therefore adhere to the Council's aims to protect existing trees as outlined in Local Plan Policy A3 'Biodiversity'.

Archaeology

6.53 As the Site is designated as an Archaeological Priority Area, a WSI was submitted and approved for the 2020 Application was approved on 14th August 2020 as a discharged condition. The WSI sets how the excavation of the lightwell on the site and the lowering of the basement slab will be monitored. Given the design of the basement remains unchanged from the 2020 Application, it is

considered that the approved WSI which is again presented to accompany the Proposed Development, would ensure that Local Plan Policies D2 and A5 which address archaeological issues in Camden are adhered to.

7.0 CONCLUSION

- 7.1 The Proposed Development is for *“Change of use of building from ancillary office (Eg) to provide 2x self-contained short term let flats (Use Class Sui Generis) including demolition of conservatory and opening up of lightwell, lowering of basement slab, creation of new entrances and replacement of windows”* in the form of two duplex dwellings at the Site.
- 7.2 The Proposed Development would result in the repurposing of the vacant building which is considered redundant office stock, no longer viable or appropriate for continued office use.
- 7.3 The Proposed Development would also result in an uplift to the existing building through the removal of the existing uPVC conservatory which is of low architectural merit, and which has a detrimental impact on the wider Conservation Area.
- 7.4 Although visitor accommodation, the proposed dwellings will comply with minimum internal standards for residential dwellings, and would therefore provide good quality accommodation for prospective visitors. The Site’s location in the CAZ and its redundant existing use is considered
- 7.5 The Proposed Development positively responds to the Council’s adopted local plan policies pertaining to quality urban design and neighbourly development, would not adversely impact on the significance of the adjacent heritage asset and consequently the presumption in favour of granting planning permission is met and planning permission should be granted without delay in accordance with paragraph 14 of the NPPF.