

13 June 2022

The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a solid yellow square background.

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Dear Sir/Madam,

**51-52 TOTTENHAM COURT ROAD, LONDON, W1T 2EQ
SUBMISSION OF FULL PLANNING APPLICATION**

Savills have been instructed to submit a full planning application for alterations to the ground floor retail unit and raising of the first floor level at 51-51 Tottenham Court Road, W1T 2EQ ("the Site"). This application has been submitted via Planning Portal.

This application follows the approvals ref: 2018/3565/P for the '*Excavation of new basement and lowering of existing basement floor level by 1.0m; installation of 2 x new shopfronts*' and ref: 2019/5320/P for '*External alterations including increase in height of existing ground floor rear extension and replacement of existing first floor rear extension*'. The proposals the subject of this planning application seek to remove the basement and lowering of basement floor from the proposals, increase the height of the ground floor rear extension and rebuild the first floor rear extension as previously consented and merge the two consented shop fronts into a single ground floor retail unit frontage.

In addition to this letter, please find enclosed the following documents for your consideration:

- Application Forms;
- Plans and drawings prepared by Squire & Partners.

Site and Surroundings

The application site comprises two properties – 51 and 52 Tottenham Court Road, London, W1T 2EH. The application site is located on the western side of Tottenham Court Road, south of Goodge Street Underground station and north of Tottenham Court Road's junction with Oxford Street. Both properties, 51 and 52 Tottenham Court Road comprises mixed uses including retail, office and residential.

51 Tottenham Court Road

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The building at 51 Tottenham Court Road comprises four storeys (ground, first, second and third floor) plus partial basement and provides a mix of retail and residential space. The retail use is situated primarily on the ground floor but also benefits from some existing basement space. The building has a modern ground floor shopfront, which is primarily formed from a painted aluminium frame and glazing. Part of the ground floor provides a right of way to the rear of the building. Generally the shopfront to Tottenham Court Road appears tired.

52 Tottenham Court Road

The building at 52 Tottenham Court Road also extends to four storeys in height (ground, first, second and third floors), with a partial basement towards the front of the site. The ground and partial basement are occupied by a retail unit and the first to third floor levels are laid out as offices. The property has a modern retail frontage at the ground floor level, which has recently been replaced with an aluminium and glass shopfront. As per 51 Tottenham Court Road, the shopfront appears tired.

Planning History

The application site has been subject to various planning applications and appeals. These applications and appeals are summarised below:

- A planning application (ref no. PS9804744R1) was submitted in relation to 51 Tottenham Court Road for the following development – Change of use and conversion of the first, second and third floors from offices (use class B1) to use as four self-contained flats together with alterations to fenestration on the front elevation and the installation of a new shopfront. The Council granted this application subject to a s106 agreement on 07 October 1998.
- A planning application (ref no. 2009/5669/P) was submitted in relation to 51-52 Tottenham Court Road for the following development – Erection of six storey building and excavation of basement to create retail space (Use Class A1) at ground and basement levels, and 3 x 2 bedroom flats, 2 studio flats (Use Class A3) and 20 bedrooms for student accommodation with shared facilities (Sui Generis) on the floors above, following demolition of the existing buildings. The Council refused this application on 24 August 2010. This decision was not appealed.
- A planning application (ref no. 2009/5947/C) was submitted in relation to 51-52 Tottenham Court Road for the following development – Demolition of existing four storey buildings. The Council refused this application on 24 August 2010. This decision was not appealed.
- A planning application (ref no. 2011/2286/P) was submitted in relation to 51-52 Tottenham Court Road for the following development – Erection of roof extension to 4th floor and alterations to front elevation in connection with provision of additional 2-bed self-contained flat (Class C3). The Council refused this application on 17 October 2011 and an appeal (ref no. APP/X5210/A/11/2166925) was dismissed by the Planning Inspectorate on 26 April 2012.

- A planning application (ref no. 2016/2027/P) was submitted in relation to 51-52 Tottenham Court Road for the following development – Demolition of existing rear extensions and erection of 4 storey rear extension, basement extension, roof extensions comprising an additional storey with mansard level above to no. 51 and set back roof extension no. 52 and external alterations including new shopfronts all to provide a mixed use retail, office and residential development involving the refurbishment and amalgamation of the existing ground floor retail units, refurbishment/reconfiguration of existing uses on the upper floors including the provision of additional office space at first to third floor levels and a new 3 bed residential flat at fourth floor level. The Council refused this application on 18 October 2016 and an appeal (ref no. APP/X5210/W/17/3173819) was dismissed by the Planning Inspectorate on 8 March 2018).
- A planning application (ref: 2018/3565/P) was submitted in relation to 51-52 Tottenham Court Road for the following development – Excavation of new basement and lowering of existing basement floor level by 1.0m; installation of 2 x new shopfronts. The Council approved this application on 5 February 2020.
- A planning application (ref: 2019/5320/P) was submitted in relation to 51-52 Tottenham Court Road for the following development - External alterations including increase in height of existing ground floor rear extension and replacement of existing first floor rear extension. The Council approved this application on 4 February 2020.

Proposals

This planning application proposes the following:

- Merging of ground floor units across 51 and 52 Tottenham Court Road to comprise a single ground floor retail unit;
- New shop frontage; and
- Raising of the first floor level.

Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 (as amended) requires that applications for planning permission are determined in accordance with the development plan, unless material considerations indicate otherwise. The adopted Development Plan comprises the following documents:

- The London Plan (2021); and
- Camden Local Plan (2017).

The Development Plan is supported by other documents including Supplementary Planning Documents and Design Guidance.

The National Planning Policy Framework (NPPF) is a material consideration and promotes sustainable development (economic, social and environmental).

Camden Council are in the process of preparing an emerging Site Allocations Local Plan. The Council consulted on a Regulation 18 draft of the Plan in February 2020, and are due to hold another round of Regulation 18 consultation in November – December 2021, prior to the publication of the Regulation 19 Local Plan anticipated for early 2022 however this is now delayed.

Planning Assessment

Principle

Camden's Local Plan sets out a clear policy framework for retail development, where it should be delivered and how it should be delivered. The relevant policies are TC1 (Quantity and location of retail development); TC2 (Camden's centres and other shopping areas); TC4 (Town centre uses)

Policy TC1 seeks to focus new shopping and related uses in Camden's designated growth areas and existing centres, having regard to the level of capacity available in these locations. Tottenham Court Road is identified as a growth area. As the proposals do not result in a net change in retail floorspace and retain an active frontage, there is no conflict with Policy TC1.

Policy TC2 promotes successful and vibrant centres, and will specifically seek to protect primary frontages in order to maintain the retail function of the centre. New retail spaces will also be expected to be of high quality, provide generous storey heights and incorporate room for signage. The proposals seek to retain the primary frontage as a combined retail unit, merging the two separate entrances into one consolidated entrance. The merging of the two units creates a much larger, more attractive retail space for occupiers to better suit the needs of a greater mix of tenants with larger spatial demands. The raising of the first floor level also improves the floor to ceiling heights of parts of the retail unit, again, improving the user experience and providing a greater quality of space for customers. As such, there is no conflict with Policy TC2.

TC4 ensures that development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. The existing site already comprises two retail units establishing the retail use in this location. Retail use is not proposed to change as a result of the proposals, with the quantum of floorspace remaining the same and the merging of two units into one.

The raising of the first floor level has already been established through planning permission ref: 2019/5320/P and will have a negligible impact on the occupiers of the first floor who will not be unduly harmed as a result. The proposals will not therefore result in any material change that will cause harm to the area or the amenity of its immediate neighbours. There has been no shift in policy or material circumstances that would lead the Council to reach a different view to its acceptability to that granted consent in 2020. There is therefore no conflict with TC4.

Alterations to the shopfront will be in accordance with the requirements of Policy D3 (Shopfronts), as detailed below,

In light of the above, it is considered that the principle of development is considered acceptable.

Design and Heritage

The relevant policies from Camden's Local Plan are Policy D1 (Design); Policy D2 (Heritage) and Policy D3 (Shopfronts).

There proposals are to improve the quality of the existing retail floorspace through the raising of the first floor level, providing more generous floor to ceiling heights and alterations to the benefit of future customers, which

will in turn create a more attractive retail space. The merging of the two retail units will provide a larger, more spacious retail unit promoting a high quality retail unit in this prime shopping location. The proposals conform with Policy D1.

The proposal is considered to comply with Policy D2 which seeks to preserve and where appropriate enhance Camden's heritage assets including Conservation Areas. The replacement shopfront will be of a high quality with reference to the existing building. The replacement shopfront will greatly improve the appearance of the building which is currently very tired. The shopfront will be maintain accessibility, will be durable and secure. The improved appearance will enhance the contribution of the site and buildings to the Conservation Area.

The proposal complies with Policy D3 which aims to ensure a high standard of design in new and altered shopfronts. The proposed shopfront design is considered to complement the character and appearance of the existing buildings, will respect the upper floors of the building and will overall improve the contribution of the site and buildings to the Tottenham Court Road frontage. The proposed shopfront design has sought to respond to Camden's Planning Guidance – Shopfront Standards.

For the reasons set out above, the proposed development is considered to comply with planning policy relating to design and heritage.

Amenity

The following policy from Camden's Local Plan are considered to be relevant to the planning application: Policy A1 – Managing the impact of development.

The proposed replacement shopfronts are not considered to result in any amenity impacts to neighbours in terms of visual privacy, outlook, daylight/sunlight, lighting, transport impacts, noise and vibration, odour, fumes, dust, microclimate, contaminated land, water and wastewater infrastructure.

Both the raising of the first floor level and merging of the two retail units will not have an impact on neighbouring amenity, with no external manifestations.

The proposals therefore conform with Policy A1.

Conclusion

The proposed development is considered to comply with Camden's Local Plan policies and material considerations. The merging of the retail unit retains a strong active frontage, with no net change in quantum of retail floorspace, continuing to offer a strong retail offering in this prime location. The resultant single unit and raising of first floor level will improve the floor to ceiling heights and create a generous high quality retail space to the benefit of future customers. The changes to the shopfront are in keeping with the external appearance of the building and are sympathetic to the Conservation Area replacing a currently tired and unsightly shop frontage. There will be no amenity impacts to neighbouring properties.

I trust the above is clear and that you have sufficient evidence in order to validate and determine the application. Should you require any further information, please do not hesitate to contact me in the first instance.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Rory Baker", written in a cursive style.

Rory Baker
Senior Planner
Savills