

TCR NEW LTD

16-24 WHITFIELD STREET LONDON W1T 2RA

Extensions to building and change of use (part)

PLANNING STATEMENT

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Contents

1. Introduction	3
2. The Site and the Application Scheme	4
3. Planning Policy	77
4. Assessment	99
5. Conclusions	11

1. Introduction

This statement is submitted in support of a further planning application by TCR New Limited as freeholders of existing premises at 55 Tottenham Court Road and 16-24 Whitfield Street London W1 following the application ref 2022/0568/P in February 2022 for Scheme A.

Planning permission is sought for extensions to the building for office use and change of use of part following the vacation of that part of the building on Whitfield Street which until recently had been occupied by the British Transport Police since its original construction for this specific user over 20 years ago. This is to facilitate its early reuse for general office purposes, consistent with Planning Policy in this part of the Central Activities Zone. The description of development is specified as:

Extensions to existing building at 2nd and 4th floor levels for use as offices and ancillary uses and change of use of part 1st floor from ancillary retail use to offices, all within Use Class E(g)(i) and consequential external alterations.

The building readily lends itself to office use, the conversion of which and external changes (confined to minor changes to the ground floor façade on Whitfield Street) are the subject of the Scheme A application for planning permission ref 2022/0568/P. This application deals with the extensions and change of use of an ancillary retail area and consequential external alterations (Scheme B). It is supplementary to the Scheme A application and assumes that planning permission will be forthcoming to Scheme A.

Supporting documentation accompanying the submission reflects issues identified in pre application discussion with LB Camden, namely:

- Supplementary Transport Statement by Milestone Transport Planning;
- Environmental Noise Survey & Plant Noise Assessment Report Hann Tucker;
- Planning Statement by Alan Cook Consultancy;
- Design and Access Statement by Alan Cook Consultancy and studio cf;

This Planning Statement serves to describe the Scheme B proposal and to assess it within an overall planning context.

It is demonstrated that the development is entirely acceptable in planning terms and that the early grant of planning permission should be forthcoming.

2. The Site and the Application Scheme

The Site and the Premises

The application site lies between the west side of Tottenham Court Road ('TCR') and the east side of Whitfield Street in Fitzrovia, within the Charlotte Street Conservation Area. The surrounding area contains a mix of retail, office, service and residential uses.

The site is bounded on its eastern side by 60 Tottenham Court Road to the north and Kirkman Place, a pedestrian cul de sac to the south. On the Whitfield Street side to the west, 26-28 Whitfield Street lies to the north and 12-14 Whitfield Street to the south.

Opposite on the west side of Whitfield Street is a public open space managed by LB Camden known as Crabtree Fields. A modern Grade II listed property at 1 Colville Place overlooks this space and is in close proximity to the site.

Public transport in the area is excellent with the site enjoying the highest PTAL rating of 6b. Goodge Street station lies some 100m to the NW and Tottenham Court Road station (which will provide access to Crossrail) lies 350m to the SE.

The site has been developed by way of mixed-use premises pursuant to a grant of planning permission in 2000, with works completed in 2002. Whilst the principal occupier was the British Transport Police, the retail unit on the Tottenham Court Road frontage is still occupied by Marks & Spencer as a convenience foodstore and is separately demised.

While the foodstore is accessed & serviced from Tottenham Court Road all pedestrian & vehicular access to the application premises is from Whitfield Street.

Planning History

The site previously contained a Metropolitan Police Station and yard which fell vacant in the late 1980s / early 1990s and was then the subject of a Public Finance Initiative scheme to redevelop it to provide accommodation for the British Transport Police as part of a mixed use scheme. Planning permission for this scheme was granted by LB Camden on 20 November 2000 (reference PS9904472/R3) and described in the following terms:

Redevelopment of the site to form a mixed use development with a British Transport Police Station and headquarters building on basement, ground and first to third floors (both sui generis use) with pedestrian and vehicle entrances on Whitfield Street, together with Class A1 retail use on the basement, ground and first floors of the Tottenham Court Road frontage, with plant on the first and fourth floors, as shown by drawing numbers [as listed] and all documents and letters listed in the Schedule of documentation dated 24 February 2000.

The permission was granted subject to some 14 conditions but only 1 of these relates to ongoing use; namely condition 11 which restricts the use of basement parking to operational vehicles.

The former British Transport Police part of the property is now vacant.

The Premises

The application premises were occupied by the British Transport Police (BTP) from 2002 until 1 May 2022.

They extend to some 3,864 sqm gross, on basement, ground and 3 upper floors, together with a rooftop plant room, as shown in the existing as built plans submitted with the application.

Separate pedestrian entrances were provided to the police station and headquarters elements, befitting their separate functions, although there is internal linkage to facilitate ease of movement.

Basement parking was provided for some 13 vehicles, accessed via a ramp exiting directly onto Whitfield Street via a roller shutter door. There is also an incident vehicle dock on Whitfield Street and dedicated on street bays for police vehicles.

The police station element of the use was confined to the ground floor and basement, including such obviously bespoke areas as interview rooms, cells, dog kennels and vehicle dock. On the upper floors the BTP headquarters offices are specified as conventional office type accommodation.

The premises were originally occupied by officers from the 'L' Region of the BTP which covered the policing of London Underground. Following organisational changes, it has latterly been occupied by the TfL sub division of B Division. It can be noted that the Force HQ of the BTP is currently based at 25 Camden Road NW1.

Further information as to why the BTP are leaving the premises was set out in Section 4 of the Planning Statement submitted with the Scheme A planning application 2022/0568/P and is not repeated here. The facilities are now located at Albany House SW1.

The Application

With the vacation of the application premises, it was clearly important that a new occupier would be secured and the planning application 2022/0568/P is directed to this objective.

Against this background and of the existing upper-level office use, the key changes which were set out in application reference 2022/0568/P centred on the conversion of the police station element and in particular the basement. Thus, the following was shown in that application which is due to be determined shortly and which set the background to this further application:

- The vehicular ramp is to be removed, with basement access secured via a new lift;
- Cycle parking, including lockers & showers in compliance with current standards, is to be contained within the basement;
- The vehicle incident dock on Whitfield Street is removed;
- There are consequential changes to a portion of the Whitfield Street ground floor elevation.

Given that these changes were within the existing building envelope there was no change to gross floor area.

This application is for 2 areas of extension and a change of use and consequential external alterations, namely

Extension to existing building at second floor and fourth floor levels for use as offices and ancillary uses and change of use of part first floor from ancillary retail use to offices all within Use Class E(g)(i) and consequential external alterations.

In accordance with the preapp discussions this Scheme B application deals only with the above areas and the total proposed GIA covered by the application is 672 sq m of which 200 sq m is additional built floorspace and 472 sq m is by way of change of use or replacement of existing floor space.

These are shown within the red lines of the planning application areas and the remainder of the relevant parts of the existing building are within the blue line being adjoining areas owned by the applicant.

3. Planning Policy

The NPPF provides an overarching policy framework in terms of sustainable development and support for employment generating development but in the present context keynote policy provisions are in the Development Plan, viz: The London Plan 2021 and The Camden Local Plan 2017. LBC Camden Planning Guidance also requires consideration. The most relevant of these policies has been clarified in pre application discussion with LB Camden.

London Plan

With reference to land use principle, The London Plan defines the role of the Central Activities Zone ('CAZ'), within which the application site falls. Policy SD4 applies and specifically supports office functions amongst other uses. This support is given further emphasis in Policy SD5, which acknowledges the pressures arising from residential uses and gives greater weight to offices and other strategic functions with the exception of specified locations.

The reasoned justification provides further guidance and notes the need for a range of office floorspace in terms of size, quality and cost. This is given further expression in detailed Policy E1 which notes that:

Improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed use development.

From a wider perspective, the Plan places significant emphasis on sustainability generally and energy efficiency specifically, setting out the energy hierarchy which should inform building design. Whilst this is largely directed to major new development it is clear that encouragement is given to these key principles for all forms of development.

Camden Local Plan

The keynote CLP Policies in the present case are considered to be Policy E1- insofar as this is directed to economic development and providing a range of employment premises- and Policy E2, which protects premises suitable for continued employment use. Significantly the terms 'business' and 'employment' in the policies are used to refer to sui generis uses of a similar nature or character to mainstream employment and thus extend beyond the (previous) B Use Class.

This approach clearly encapsulates the BTP headquarters element and its ongoing suitability for employment. Although the police station use clearly has a particular character as a sui generis facility it should be particularly noted that it has been confirmed in pre application discussion that its loss does not trigger a community use replacement under Local Plan Policy C2, given that it is clearly a specialist facility with a London-wide function, which is being replaced elsewhere in the capital. On this basis Policy E2 retention of employment is a closer policy fit as was made clear in the earlier application 2022/0568/P.

It is also noteworthy that CLP policies which provide for the mixed use of business premises through the incorporation of housing on or off site are only triggered where there is a floorspace increase of more than 200 sq m, which does not apply here.

Policy D1 Design is engaged and whereby the Council will seek to secure high quality design and requires development to comply with defined criteria a. – o. Policy D2 Heritage requires that the Council will preserve and where appropriate enhance heritage assets and their settings. The urban design officer attended the preapp discussions and was satisfied with the design of the extensions and consequential external alterations.

In presenting the scheme for consideration we have also had regard to:

CPG 'Transport' January 2021, which provides further detailed guidance as to car free development, servicing, and cycle parking. This is reflected in application 2022/0568/P.

The assumption is made that the Scheme A application is permitted so that the cycle parking and internal arrangements at basement level shown in the Scheme A application are adapted to reflect the increased floor space in this Scheme B application.

CPG 'Energy Efficiency and Adaptation' which amplifies policies CC1 & CC2 and distinguishes between minor, medium & major refurbishment. The 2022/0568/P application identified the category as minor and the extensions and change of use in this application are considered to be minor.

4. Assessment

Development Principle

Since the proposals involve any increase in built floorspace of only 200 sq m, the mixed use/housing policies of the CLP are not brought to bear.

In short, the proposal is entirely acceptable in terms of development principle and will secure ongoing employment opportunities in this highly accessible part of the CAZ.

The application falls within the parameters for determination by officers under delegated powers.

Transport

The Transport Assessment has been supplemented with that submitted with Scheme A to provide the revised number of cycle spaces for the extension and change of use (part).

The accompanying Supplementary Transport Statement reviews the change of use from a transport perspective and demonstrates that in trip generation terms the additional general office use now proposed is small and will generate significantly less daily person trips than did the BTP use when this was fully operational.

Notwithstanding the benefits of this overall reduction, a detailed analysis of modal split and distribution of trips associated with office use has been carried out and it is shown that the impacts on the pedestrian, cycle, public transport and highway networks at micro, neighbourhood and area-wide level will be negligible.

It is particularly noted that securing car free development via alterations to the basement and removal of the vehicular access ramp is an important benefit of the proposals especially in this conservation area and secures compliance with important strategic & local policy objectives. The changes to the public highway which flow from this – most particularly the removal of vehicular crossovers & footway reinstatement – are also beneficial and can be secured by Agreement.

The removal of basement car parking under Scheme A provides the opportunity to cater for secure long stay cycle parking in compliance with contemporary standards, as well as supporting locker, toilet and shower facilities. Access to this area via a new platform lift will accommodate all types of cycle.

As we note below deletion of the access ramp & vehicle bay are also of benefit in design terms.

Having regard to these considerations, the proposals can be considered to be entirely acceptable in transport terms.

Design

There are several changes to the existing building on the Whitfield Street ground floor frontage which are dealt with in the Scheme A application, where the removal of provision for vehicles on site affords the opportunity for a more sympathetic streetscape. The

proposed elevation by studio cf shows functional roller shutter doors replaced by glazing and framing to match the treatment of the main frontage. The mural which exists on the southern portion of the frontage and which we believe was installed in about 2003 will be maintained. The extension to the 2nd floor level in the element above the existing vehicle access is designed in sympathetic style above which is an amenity area for the offices.

During the preapp stage we reduced the amount of the extension at 4th floor level and set it back further from the Whitfield Street elevation. The top floor, amenity screen, plant screen and staircase head are all not visible from Tottenham Court Road as shown on the submitted plans, sections and 3Ds. We have also submitted a separate information note on Crabtree Fields. There is a landscaped planter strip at the top of the 4th floor behind which would be the private roof terrace set back.

The Tottenham Court Road elevation is improved by providing glazing in sympathetic style at first floor level to provide natural light to the former retail plant area and replace the functional plant grilles which currently are within the Tottenham Court Road frontage.

The extent of proposed affordable workspace provided as part of Scheme A is shown on the submitted proposed ground floor layout for consistency and as part of the blue lined area owned by the applicant and reflecting the amended Scheme A application.

These clearly represent significant improvement on the existing and as such the S72 duty which applies in respect of the Conservation Area is satisfied. Equally, the setting of the Grade II listed building at 1 Colville Place is improved.

5. Conclusions

The application premises at 16-24 Whitfield Street were originally constructed to meet the specific requirements of the British Transport Police (BTP) and were occupied by this user for over 20 years. The recent vacation of the premises at the behest of the BTP necessitates that a new occupier is secured and submission of this application for minor increases in built area and a change of use of an ancillary retail plant area to offices (Scheme B) follows the application ref 2022/0568/P for Scheme A. This further application builds on the principles established by Scheme A and is designed to establish the key elements of this reuse and ensure the maximum use is made of this urban site.

Whilst a significant portion of the building was already akin to offices and arguably benefits from such designation there are clearly elements which were bespoke to the BTP and as such the application for change of use ref 2022/0568/P was considered to be appropriate. Attendant charges to the external fabric of the building are sympathetic and the internal reconfiguration the subject of the separate planning application ref 2022/0568/P allows the development to be car-free in compliance with key policy objectives.

Pre application discussion with LB Camden has confirmed that the further extensions and change of use forming Scheme B are acceptable in terms of land use principle and urban design, given the clear support for office use expressed in both the London Plan & the Camden Local Plan. The extensions will clearly secure further employment opportunities in this highly accessible part of the CAZ.

In transport terms It has been demonstrated that general office use will generate significantly less daily person trips than did the police use when this was fully operational. As a result and having regard to the anticipated mode & distribution of new trips, impacts on the transport & highway network will be minimal.

Reuse of the building is in itself inherently sustainable and will take account of other relevant sustainability principles, including those related to energy use as set out in application ref 2022/0568/P.

The extensions have been demonstrated to have no adverse impact on the adjoining areas, including the Conservation Area and will provide streetscape benefits and overall is an enhancement to the Conservation Area, the setting of the nearby listed building and the setting of the public open space at Crabtree Fields.

In overall terms the proposal warrants the grant of permission for the extensions and change of use as part of the future re-use of the application premises for a use which is entirely consistent with planning policy. The application represents no reduction in the extent of ground floor retail frontage. The increase in new built gross area is not more than 200 sq m and the policy requirement for self-contained housing is not engaged.

Alan Cook Consultancy
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