



Da Vinci House  
44 Saffron Hill  
London EC1N 8FH  
tel: +44 (0)20 3640 8508  
fax: +44 (0)20 3435 4228  
email: [info@iceniprojects.com](mailto:info@iceniprojects.com)  
web: [www.iceniprojects.com](http://www.iceniprojects.com)

Planning Department  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

14 July 2022

Our Reference: 22/246  
Via PLANNING PORTAL

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**  
**40 WHITFIELD STREET, LONDON W1T 2RH**  
**APPLICATION FOR FULL PLANNING PERMISSION**

---

We write on behalf of our client, E&A Property Investment Company Limited (the Applicant), to formally submit a full planning permission in accordance with the Town and County Planning Act 1990 (as amended) for the above site.

This application seeks planning permission for the following development:

*“Alteration of ground floor elevation to replace a redundant service door with a new entrance door”*

The following documentation has been submitted with this application:

- This Covering Letter / Planning Note
- Application Forms and Certificates
- Site Location Plan
- Existing and Proposed Floor Plans and Elevation Drawings

**a. The Site and Relevant Background**

---

40 Whitfield Street is an existing five storey (plus basement) commercial building that was constructed in the early 1990s. The full address of the building is 34-42 Whitfield Street and 10-16 Goodge Street, with the larger commercial building having frontages to both Whitfield Street and Good Street. The buildings connect internally. An existing Tesco Metro retail unit is provided on the Goodge Street/Whitfield Street corner, with the remainder of the building being used for general Class E commercial purposes.

The building was constructed in accordance with planning application reference 8800483, which saw planning permission granted to provide retail and office accommodation at ground floor level, with office accommodation on the upper floors.

Importantly, this permission did not have any restrictions over land uses and, as a result of the amendments to the Use Classes Order in 2020, the entire building now benefits from an open Class E use. This permission remains the operative permission to this day.

Servicing of the retail unit no longer occurs via Whitfield Street and the service entry door at this location is redundant. As part of internal reconfiguration at ground floor level, the space behind this service door is now office accommodation.

It is therefore proposed to provide an alternative entrance into this office accommodation by removing the service door and replacing it with a new glazed entrance door that matches the existing entrance door to 40 Whitfield Street at present. This new entrance door would improve the streetscene by creating a more legible building and also through increasing surveillance to the street. This entrance would also allow a separate, individual access to be provided at ground floor level, increasing the flexibility of this space.

### **Planning policy designations**

The Application site is situated within Holborn and St Pancras ward within the London Borough of Camden. It is subject to the following designations:

- London's Central Activities Zone (CAZ)
- Goodge Street Neighbourhood Centre
- Charlotte Street Conservation Area

It is also noted that the site falls outside of a primary shopping frontage, with this frontage located along Goodge Street rather than Whitfield Street.

The buildings are not locally or statutory listed.

The site also benefits from a public transport accessibility level (PTAL) of 6b, indicating excellent public transport connectivity.

### **Planning history**

As noted above, the most relevant planning application for the proposed development is application reference 8800483.

This permission remains the operative permission and confirms that the building is in open Class E use, with no restrictions over land use.

As such, the internal reconfiguration works to facilitate the office use behind the alterations to the ground floor façade does not require planning permission.

This application therefore only relates to the ground floor alterations only.

### **b. Proposed Development**

---

The proposed development would see alterations occur to 40 Whitfield Street at ground floor level. It would see an existing black metal service door, which is no longer required, replaced with a new glazed entrance door, providing an additional entrance point into the ground floor Class E commercial accommodation.

In addition, minor changes to the pavement (within the red line of the Applicant's ownership) would occur. These works include the partial removal of metal railings and the provision of new hard surfacing to connect better with the paving provided to the public highway and footpath.

In terms of access, these proposals would not alter the primary access points into the building, nor would it alter the existing serving arrangements of the building.

In terms of cycle parking and bin storage, the changes would not alter this either, with the existing access doors to the communal bin and delivery area to the right of the proposed door alteration, remaining unchanged.

Further details of the proposed changes, including the materials of the proposed door, are set out within the Drawing Package prepared by BASE.

### **c. Planning Policy Assessment**

---

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

The relevant Development Plan for the site consists of:

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

Camden also has a number of Camden Planning Guidance documents (CPGs) and Conservation Area Appraisals which form material considerations for this application.

The Revised National Planning Policy Framework (NPPF) was published in February 2019 and sets out the Government's economic, environmental and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system.

An assessment of the key planning considerations is set out below.

#### **Land use**

While the proposed development does not propose and changes in land use, it is noted that the proposed alteration to the doors at ground floor would help facilitate better access to the commercial office space within 40 Whitfield Street.

This would align with Policy E1 and E2 of the Local Plan which seeks to ensure commercial accommodation is flexible and new and improved floorspace is located within the CAZ.

It also noted that the original purpose of the door that is being altered was linked to the retail use of the unit fronting Goodge Street. This change would not result in the primary retail frontage of the building on Goodge Street being jeopardised.

#### **Design and heritage**

Local Plan Policy D1 'Design' seeks to secure high quality design in all development that respects local character and context. Specifically, in relation to shopfronts, it encourages active shopfronts that add vitality to the street and provide views into and out of buildings, and specific proportions at ground floor level to attract pedestrians.

Policy D2 'Heritage' requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.

The Charlotte Street Conservation Area Appraisal (2008) assesses the key characteristics of the conservation area. The Appraisal doesn't identify the building as a positive or negative contributor to the character and appearance of the conservation area, and it also notes that Whitfield Street is a street defined by more modern, 20<sup>th</sup> century buildings. It notes a variety of brick and render as being

the predominant materials. The Appraisal also notes that opportunities to enhance the public realm should be taken and ensure that historic details are retained.

The alterations sought by the proposed development would see an existing redundant service door, clad in black metal, removed and replaced with a new glazed door that would match the existing entrance door at 40 Whitfield Street. This would improve the relationship of the building with the street and also result in increased symmetry and consistency of the ground floor façade.

The proposed development would also see the removal of a portion of the metal rails along the frontage of the site, and see the provision of new paving at ground floor level to match with the finishes along the public highway and footpath. These changes would help improve the ground floor entrance experience to the building and provide an improvement to the pedestrian experience along this section of Whitfield Street.

For these reasons, the proposal is considered to represent a small enhancement to the character and appearance of the conservation area, as a more active and legible entrance would be provided, along with small enhancements to the public realm along the frontage of the site. The scheme is therefore considered to comply with Policy D1 and D2 of the Local Plan.

## **Access**

Policy D1 'Design' of the Local Plan seeks high quality design which includes design that is inclusive and accessible for all. Supporting text notes that any adaptation of existing buildings must respond to access needs whilst ensuring that alterations are sympathetic to the building's character and appearance.

Policy C6 'Access for All' of the Local Plan promotes fair access in developments and expects all buildings to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.

The changes proposed would still see level access provided to all of the building via the main entrance on Whitfield Street. The new entrance would also provide secondary level access into the building. This would allow the office accommodation to continue to be accessible to and used by all in accordance with Policy D1 and C6 of the Local Plan.

## **d. Summary**

---

Overall, the proposed development is considered to deliver a number of planning and public benefits. These include:

- A more attractive frontage to the street with a design that respects the character and proportions of the existing building
- An improved frontage that enhances the Conservation Area
- Optimisation of the entrance to the office and definition of the entrance along the street
- Improved access to the existing office accommodation
- Increased active frontage and passive surveillance on the street
- Improved light to the internal office space as well as future flexibility of use for tenants.

The proposals have been assessed and considered to comply with the relevant adopted and emerging planning policy and guidance.

Overall, the proposals are considered an enhancement to the streetscene and the host building and should be granted planning permission and advertisement consent without delay.

We trust that the enclosed information is sufficient to expedite validation of our application. However, should you require any further information, please do not hesitate to contact Lewis Westhoff (020 3640 1024 or [lwesthoff@iceniprojects.com](mailto:lwesthoff@iceniprojects.com)) of this office in the first instance.

Yours sincerely,

A handwritten signature in black ink that reads "Iceniprojects Ltd." The signature is written in a cursive, slightly stylized font.

Iceni Projects

ENC. As listed above.