

## Planning Statement

73-75 Kenton Street  
WC1N 1NN

Prepared on behalf of BKDM LLP • 2023

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# 1. Background

## 1.1 Introduction

This Planning Statement has been prepared as part of the Change of Use application for 73-75 Kenton Street. It should be read in conjunction with the Design and Access Statement, and the supporting materials which further demonstrate marketing exercises conducted for 73-75 Kenton Street.

A pre-planning application (ref 2021/6142/PRE) was submitted in December 2021 to Camden Planning Department by BKDM LLP. The Camden planning officers have been notified of the intent and have provided helpful comments on the pre-planning application materials. We have made changes and improvements to the application based on the pre-planning advice (see **Section 4.2.1**).

## 1.2 Building Information

73-75 Kenton Street is a four-story brick building near the corner of Kenton Street and Tavistock Place. The building is a semi-detached, self-standing masonry structure with a total internal area of 320m<sup>2</sup>.

73-75 Kenton Street is not a listed building but is identified as a positive contribution to the Bloomsbury Conservation Area. Though the site had existed since the early 1800's, the building in its current form is estimated to have been built in 1906. 73-75 Kenton Street was originally built as a light-industrial/warehouse building, and was later re-purposed into an office building.

## 1.3 Planning History

A change of use application (ref 2013/5975/P) was submitted in 2013 by the previous owner of the property. The application proposed to change the building use from B1 office to C3 dwellings, with four self-contained residential units across four floors. The application was withdrawn before a decision was made.

73-75 Kenton Street underwent minor exterior changes over the years, including material changes of facade openings and of the main entrance door. We are unable to uncover any documentation of planning permissions of these changes.

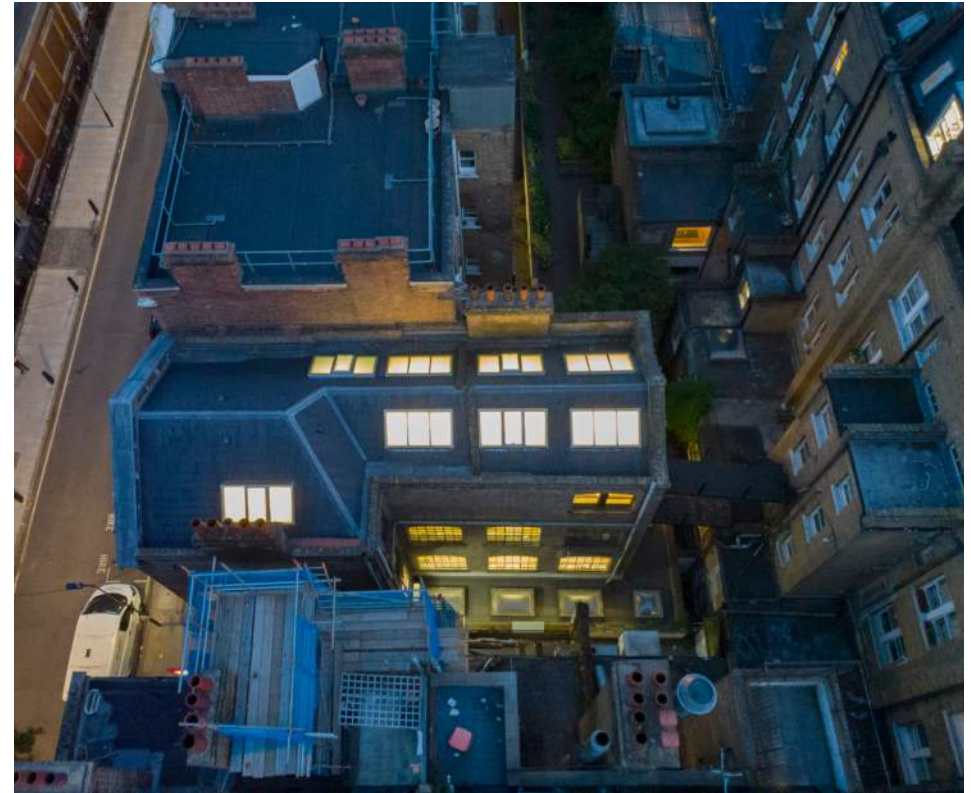


Fig. 1. 73-75 Kenton Street Aerial View

## 2. Planning Policy Context

### 2.1 Planning Overview

The applicant has consulted the following planning provisions and regulations in preparation of this Planning Statement:

- National Planning Policy Framework (2021),
  - London Plan (2021),
  - Camden Local Plan (2017), and
  - Camden Planning Guidance on Employment Sites and Business Premises (2021),
- and other relevant guidelines. This Planning Statement draws the majority of its planning references from the Camden Local Plan and Camden Planning Guidance; these policies are assessed under the frameworks laid out under the National Planning Policy Framework (NPPF), and London Plan, along with planning directives specific to conservation areas.

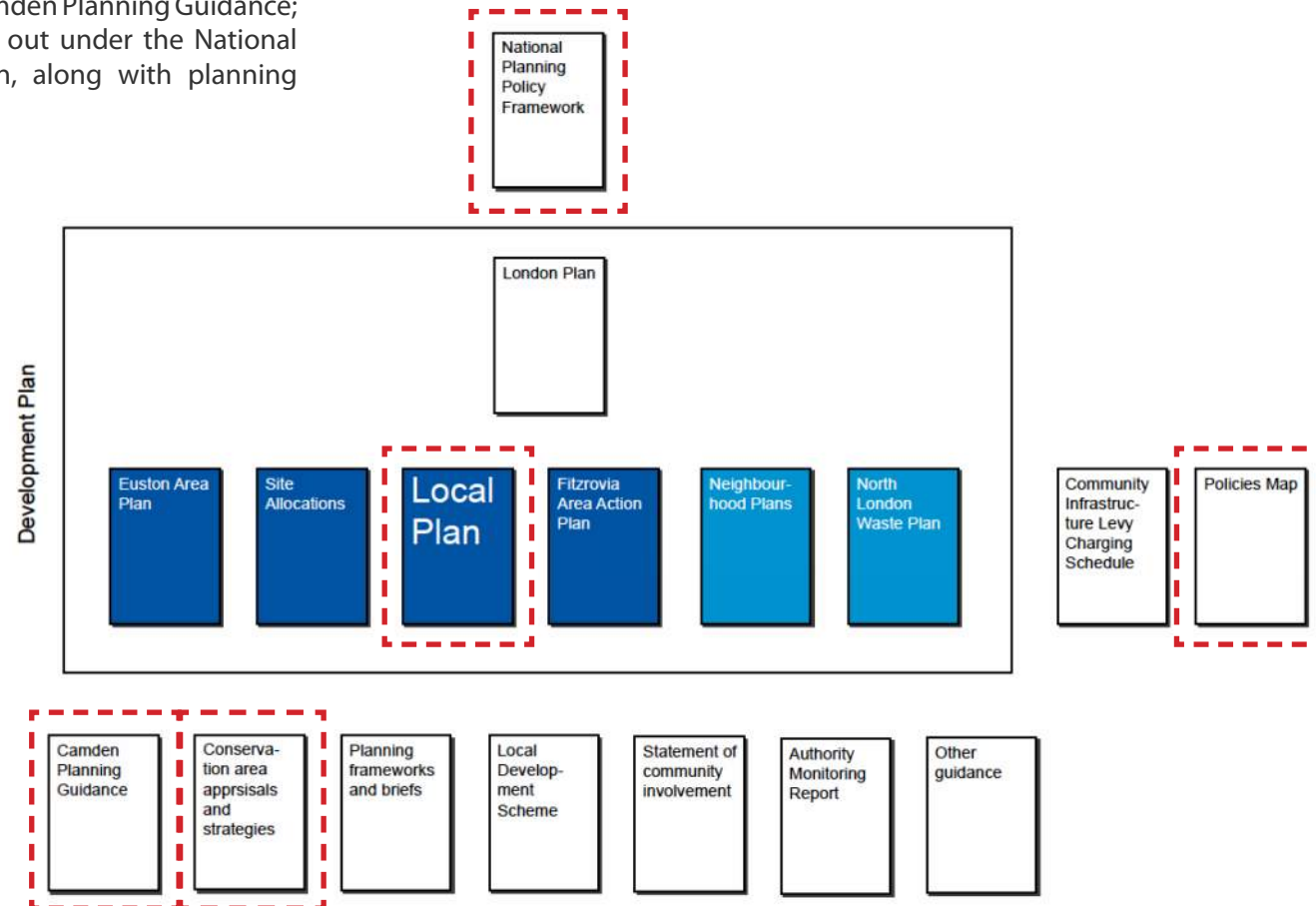


Fig. 2. Planning Document Hierarchy  
source: Camden Local Plan

## 3. National Planning Policy Framework

### 3.1 Overview

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied; it provides a framework with which locally-prepared plans for housing and other development can be produced. The NPPF must be taken into account in preparing the development plan, and its material consideration in planning decision.

In accordance with the NPPF, policies in the Local Plan and relevant planning guidance should be given weight to the decision-making process only so long as they adhere to the principles outlined in the NPPF.

For this planning application, we have taken excerpts of relevant policies guidances from the NPPF, as summarised below in *Section 3.2 Relevant NPPF Policies*, to provide context to the planning priorities set out in the Camden Local Plan, and to demonstrate that our planning application are guided by these principles.

### 3.2 Relevant NPPF Policies

- **Achieving sustainable development**

Sustainable Development is a core principle guiding the NPPF. *Paragraph 7* summarises the objective of sustainable development as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”. *Paragraphs 10 and 11* state that “at the heart of the Framework is a presumption in favour of sustainable development”.

- **Tailoring planning controls to local circumstances**

*Paragraph 53* advises that the use of Article 4 be limited to “situations where the Article 4 direction is necessary to avoid wholly unacceptable adverse impacts”, or to “protect local amenity or the well-being of the area”, and “apply to the smallest geographical area possible”.

- **Delivering a sufficient supply of homes**

The NPPF stresses the need for quantity and variety of housing supply. *Paragraph 62* highlights the importance to assess “the size, type and tenure of housing needed for different groups in the community”, including but not limited to “...families with children, older people ..... and people wishing to commission or build their own homes”.

- **Promoting healthy and safe communities**

The NPPF states that Planning Policies should aim to healthy, inclusive and safe places which are (...) safe and accessible so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion (*Paragraph 92*). Furthermore, *Paragraph 94* asks Planning Policies to consider the social, economic and environmental benefits of estate regeneration.

- **Achieving well-designed places**

*Paragraph 126* states that “the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect to sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

- **Planning for Climate Change**

*Paragraph 153* states that “policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts”. Paragraphs 154 & 155 provide guidelines for local planning policies to help ensure new developments are planned in ways that reduce greenhouse gas emissions, and increase the use of renewable energy sources.

## 4. Camden Local Plan

### 4.1 Policy A1 Managing the Impact of Development

**Policy A1** *Managing the Impact of Development* (p.184) lays out the factors crucial to maintaining the amenities in the neighbouring environment of a project. The Council will consider the protection of existing amenities, impact on traffic, issues of privacy, outlook, overshadowing, noise, and impact upon infrastructure, among other concerns.

This Change of Use proposal aims to restore 73-75 Kenton Street for the stated uses and does not involve any major exterior alterations. Overall, the proposal will have no impact on neighbourhood amenities.

In response to *Paragraph 6.4 Visual Privacy & Outlook*, the proposal does not introduce any new facade opening or new outlook, and shall not compromise the privacy of neighbours.

Likewise, in response to *Paragraph 6.5 Sunlight, Daylight & Overshadowing*, the proposal does not alter the height of the existing building nor does it introduce any intrusions that may block the neighbours' access to natural light (the lift overrun protrudes from the roof only to a limited extent and will not cast additional shade).

In response to *Paragraph 6.8 Transportation Impacts*, the proposal does not affect the current transportation pattern and density in the area. This Change of Use is a car-free proposal and will not bring additional burden to the parking arrangements on Kenton Street.



Fig. 3. Composite Aerial View of the Marchmont Community Garden

## 4.2 Policy D1 Design

**Policy D1 Design** (p.224) lays out the criteria for high quality design. The design proposal strives to meet, if not exceed, the Borough's standard for design and construction quality. In response to some key criteria listed in the policy description:

- **respects local context and character**

The design proposes limited changes to the building exterior, and priorities are given to the restoration of existing facade elements. Any changes and additions are deliberated with reference to local examples and driven by design considerations for durability, usability, aesthetic continuity, and historical accuracy. As buildings in Bloomsbury Conservation Area constantly go through sensible repairs and upgrades, 73-75 Kenton shall be no exception in its upkeep with the local character and with the positive changes in the neighbourhood.

- **preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage**

Though 73-75 Kenton Street is not a listed building, it is a beautifully-preserved example of early 20<sup>th</sup>-century industrial architecture, which has become increasingly rare in Central London. This proposal prioritises the preservation and sensible restoration of the building; where modernisation is necessary, we seek to integrate the new elements in a sensitive and respectful manner to the building's heritage.



- **is of sustainable and durable construction and adaptable to different activities and land uses**

**The construction is expected to be performed in the highest quality and environmental standards throughout, maximising 73-75 Kenton Street’s performance and service.** Considerations for various uses and future adaptations have informed the design process: the dwelling is designed to adapt to a growing family’s changing needs; the construction aims to limit the waste of materials and maximise the use of sustainable materials. In the end, 73-75 Kenton Street shall be architecturally enhanced and brought up to high environmental performance, with a focus on human experience and comfort.

- **is inclusive and accessible for all**

The proposed renovation significantly improves the accessibility of 73-75 Kenton Street. The exterior lightwell lift enables step-free access to the office space on the lower ground level (*Fig. 4*), while the interior lift and a stair lift allow handicapped accessibility across all residential levels; the ground floor has a fully accessible bedroom for wheelchair users. **See Accessibility Statement for full details** (page 37 under *Design and Access Statement*).

- **is secure and designed to minimise crime and antisocial behaviour**

The improvements on the front railings and gate shall enhance security and deter antisocial behaviours. The gate is designed to maintain visual and material contiguity with the front fences of Aberdeen Mansions and the Army Reserve Centre. By adding planters and actively hosting a variety of vegetation at the front, the building shall become a friendly and welcoming sight in the neighbourhood. In order to curtail antisocial behaviours in the back alley, owners of 73-75 Kenton Street would also like to discuss and coordinate with the Tavistock Place neighbours about the improvement of the back alley entry gate and security system.



Fig. 4. The renovated building provides step-free access

#### 4.2.1 Pre-Planning Advice Design Responses

In response to questions and concerns raised in the Pre-Planning advice, this application has made several design updates and clarifications. Specifically:

- **replacement of windows on the front elevation**

In the revised design, the newly added large windows at the former stairwell openings are subdivided with thin metal window mullions (*Fig. 5*); this new window pattern follows the proportions and subdivisions of the existing windows, blending in with the rest of the facade.

In response to concerns over potential incongruity of having floor slabs blocking the large windows: the new mullion pattern shall express the locations of the slab in a deliberate manner, eliminating potential misreading of the exposed slabs as ‘accidental’. In addition, the slabs will be encased with ‘shadow boxes’, an architectural procedure often seen in buildings with glass curtain-wall facades. The newly infilled slabs will terminate at the wall, and will not extend to be in direct contact with the glass; this gap allows the shadow box to be discretely installed and the floor slab properly expressed.

- **disabled access introductions**

The owners of 73-75 Kenton Street wish to accommodate a family member who is a wheelchair user, and a wheelchair accessible home is essential. The external platform lift, as illustrated in the design render image (*Fig. 6*), **remains in its default position at the lower ground level most of the time and will not block the lightwell nor impact the building’s appearance; it will not affect natural light coming in from the lightwell either.**

As noted in the pre-planning advice, the front steps are an important original feature of the building; thus in the revised design, **the front steps won’t be removed and will be maintained in their current condition.**

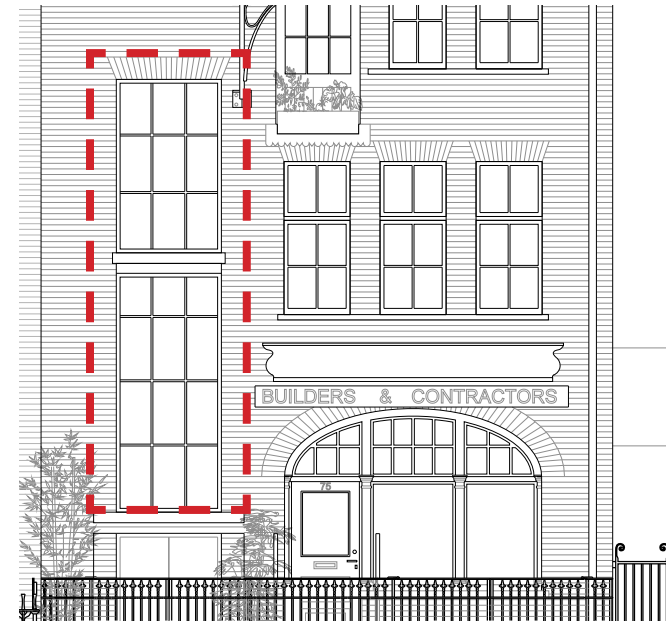


Fig. 5. Proposed new windows to cover existing stairwell openings



Fig. 6. Lightwell platform lift at its default position on the lower ground level

- **replacement of front door, new front railings, and concrete plinth**

The proposed front door is a close approximation of the historical door as shown in the 1929 photograph; the original colour and finish of the door could not be inferred from the photograph (Fig. 8). The proposed dark and muted tone on the front door is aesthetically coherent with the colour palette of the whole front elevation (Fig. 7).

The front railings are now proposed as a continuous, coplanar railing with swinging gates, in order to properly reflect the historical examples and local conventions. Concurring with the pre-planning advice on the preservation of original concrete plinth, the revised design will maintain the existing elements and match the gate treatment at the Army Reserve Centre across the street (Fig. 9).

The gated front entrance provides much needed security and efficient maintenance for both the residence and the business (refer to the Design and Access Statement Section 1.7.2, page 20-21). For reference, there are various examples of gated entrances (Fig. 9-14) and platform lifts (Fig. 15-16) at Grade I & II listed buildings in Bloomsbury.

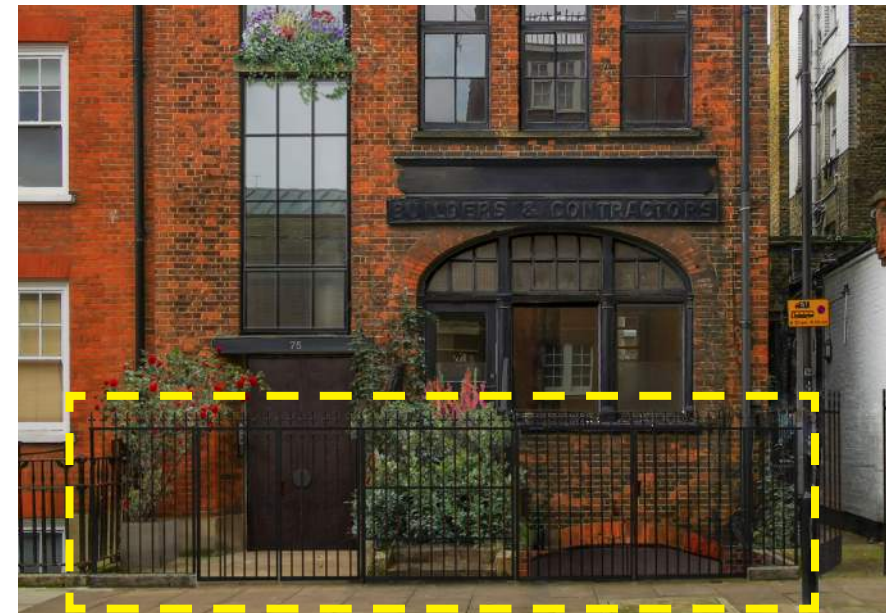


Fig. 7. Proposed new fence and gate



Fig. 8. Original Door at 73-75 Kenton Street



Fig. 9. Army Reserve Centre, with concrete plinths and metal swing gates



Fig. 10. 59-60 Russell Square features a retractable metal gate



Fig. 11. 30 Cartwright Gardens



Fig. 12. 54 Cartwright Gardens



Fig. 13. 105 Judd Street

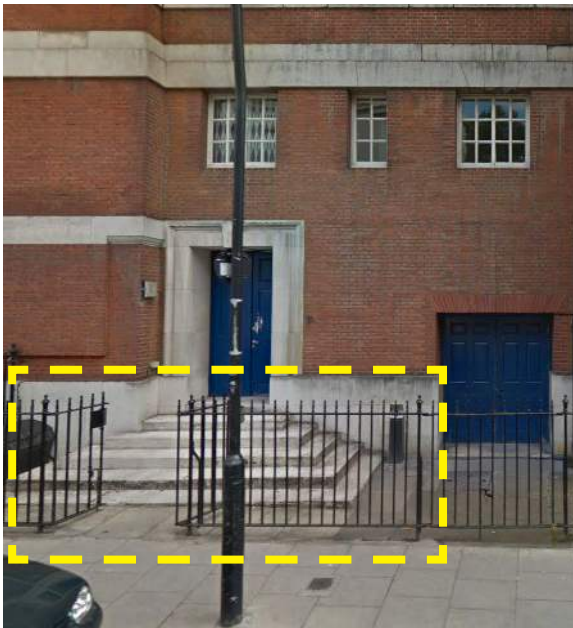


Fig. 14. 39 Burton Street



Fig. 15. 1 New Square with external platform lift



Fig. 16. 38 Bidborough Street with external platform lift

### 4.3 Policy D2 Heritage

Policy D2 *Heritage* (p.233) defines conservation areas as part of the designated heritage assets. For development of unlisted buildings within a conservation area, the council requires conservation and enhancement of the character and appearance of a conservation area, and resists demolition of buildings that make a positive contribution to its area.

The design proposes limited changes to the building exterior, and priorities are given to the restoration of existing facade elements. Any changes and additions are deliberated with reference to local examples and driven by design considerations for durability, usability, and aesthetic continuity. As buildings in Bloomsbury Conservation Area constantly go through sensible repairs and upgrades, 73-75 Kenton shall be no exception in its upkeep with the local character and enhancing the positive changes in the neighbourhood.



Fig. 17. Photograph of 73-75 Kenton Street, 1929  
Source: Camden Local Studies and Archives Centre

## 4.4 Policy H1 Maximising Housing Supply

*Policy H1 Maximising Housing Supply* (p.44) lays out the Borough's prioritized need for housing, especially self-contained housing. In *Paragraph 3.18*, the Plan describes the benefits of self-contained housing, particularly its flexibility in serving various age groups and its family-oriented accommodations. In *Paragraph 3.8 Camden's Housing Needs and Targets*, it is stated that "[t]his overall need includes the homes needed to meet the needs of different groups within the community, including families with children and people with disabilities."

73-75 Kenton Street is situated in the Marchmont neighbourhood where a mix of self-contained homes and HMO's make up the majority of land uses. (Fig. 18) The neighbourhood has always been family-oriented and is seeking more housing, both in quantity and in variety, to continue supporting the character and growth of the community. The proposed dwelling at 73-75 Kenton Street is a self-contained single-family residence, tailored to the occupant's current need and future growth. The dwelling is designed to accommodate different generations of family members, with fully accessible accommodations across all floors.

- flats and HMOs
- single family dwelling-houses and short-stay hotels



Fig. 18. Composite Historic Building Plans of the surrounding buildings, ca.1906-1908; today, the housing type around the block consists mostly of apartments and single family dwelling-houses.

## 4.5 Policy H2 Maximising the Supply of Self-Contained Housing from Mixed Use Schemes

*Policy H2* (p.53) promotes the inclusion of self-contained housing in mixed-use developments. In assessing whether self-contained housing is required as part of the development, the council takes into account multiple factors, including 1) the character of the development and of the site, 2) whether the self-contained housing is compatible with the non-residential use in the development and with nearby land uses, and 3) whether there is a need to increase community safety by introducing an active street frontage and natural surveillance. Furthermore, in *Paragraph 3.44* (p.54), it is stated that, to support Camden's mixed-use character and the aims of Policy H1, the Council will encourage non-residential developments throughout the borough to provide self-contained housing as part of the mixed uses.

As confirmed in the Pre-Planning Advice, our proposal of one self-contained single-family dwelling is compatible with Policy H2 and thus acceptable. The Marchmont community has been seeing a gradual loss of self-contained housing over the years; we feel that the introduction of a single-family residence is the best way to contribute to the growth of the community, as it brings in permanent multi-generational residents and ensures high quality housing.

In response to the criteria listed under Policy H2: Almost all of the buildings in the Marchmont neighbourhood are mixed use types, with businesses on the lower ground/ground levels and residential on the upper levels. By turning 73-75 Kenton Street into a C3 dwelling-house + E business mixed-use development, we believe the building shall better fit into its surrounding land uses and characters. As often mentioned in this application, Kenton Street is in urgent need for increased street security. For years, the neighbours have been bothered by anti-social activities in front of 73-75 Kenton Street, mainly due to the building being of office use and being unoccupied at night. A self-contained residence will not only bring natural surveillance to the neighbourhood but also ensure the upkeep of a pleasant and safe environment on Kenton Street.

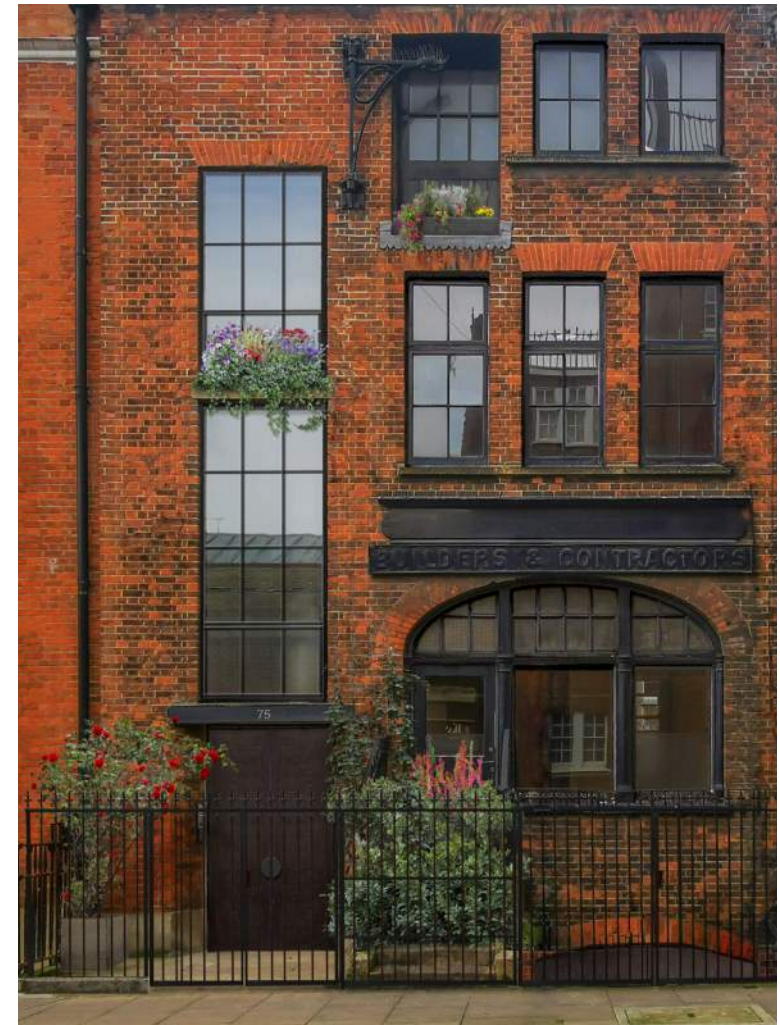


Fig. 19. Proposed Front Facade

### 3.6 Policy E2 Employment Sites & Business Premises

*Policy E2 Employment Sites & Business Premises* (p.173) illustrates Camden Council's approach to maintaining business premises and employment opportunities. In *Paragraph 5.37 Proposals involving loss of business premises and sites*, the following questions are posed in considering the legitimacy and viability of the proposal:

- **the suitability of the location for any business use**

While the location of 73-75 Kenton Street is in proximity to shops on nearby streets, **Kenton Street itself is a quiet residential street**, tucked away from much of the public traffic and community activities. Surrounded by Aberdeen Mansions, Marchmont Street flats, Brunswick Centre, and Seymour House, 73-75 Kenton is the only remaining office building in the entire residential block, and businesses in the past have found the location unattractive for their clients and customers to visit. Furthermore, the raised ground floor away from the paved shopping streets is not a prime location for a shop front.

Residents from Aberdeen Mansions, Tavistock Place, and Marchmont Street have complained that late-hour business activities used to generate noises (i.e. employees smoking and chatting on the rear-side egress bridges, evening office events) in the shared back alley.

For years, 73-75 Kenton Street has been attracting various anti-social behaviours due to its prolonged vacancy. As aforementioned in Policy H2, the building's location away from public sight means that illicit activities shall continue bothering the neighbourhood, unless the building's permanent residents can actively maintain and monitor the property and restore security in the neighbourhood.

Even before the COVID-19 pandemic, the location had trouble attracting long-term office tenants; since the summer of 2020, the building has not received any serious inquiries despite being actively marketed online as available for both long-term and short-term leasing. Please refer to Mr. David Shapiro's letter of assessment for further explanation on the difficulties in leasing the building.



Fig. 20. Kenton Street Looking North



- **whether the premises are in a reasonable condition to allow the use to continue**

Currently, all floors suffer from very low EPC (Energy Performance Certificate) ratings. The spaces will require substantial renovation and upgrades to be properly insulated and energy-efficient for office occupation.

None of the four floors currently have a viable secondary fire egress path - the first and second floors rely on the now dilapidated fire bridges to the west side of the building (fig. 21); the ground floor has a back door which leads to the low roof with no further egress; the lower ground floor has no secondary egress at all.

Although the spaces were renovated in the early 2000's, they are considered "under-fitted" and as "low specification offices", based on professional assessment from Mr. David Shapiro (letter attached with this application).

In short, the spaces are not in a desirable condition to attract any potential long-term business occupants. Even if the spaces were considered occupiable, they are not competitive in the current market, where supply exceeds demand. Such low-quality spaces may even attract businesses that aren't suitable for the residential environment of the Marchmont neighbourhood.

- **whether the business use is well related to nearby land uses**

73-75 Kenton Street's location in a quiet residential block and its basic interior condition make it difficult to attract small businesses. As shown in the Camden Policies Map, published in August 2021, **73-75 Kenton Street is not included in the 'Neighbourhood Centre' zone within the Marchmont Community** (fig. 22).

The proposed change of use shall not only accommodate a single family residence, which is welcome by the Council and beneficial to the neighbourhood; the business component will be refitted with an aim to support creative industries, which is well related to Bloomsbury's character and history as a place of arts and culture, and a sustainable business type with potential to grow and transform.



Fig. 21. dilapidated egress bridge poses safety risks

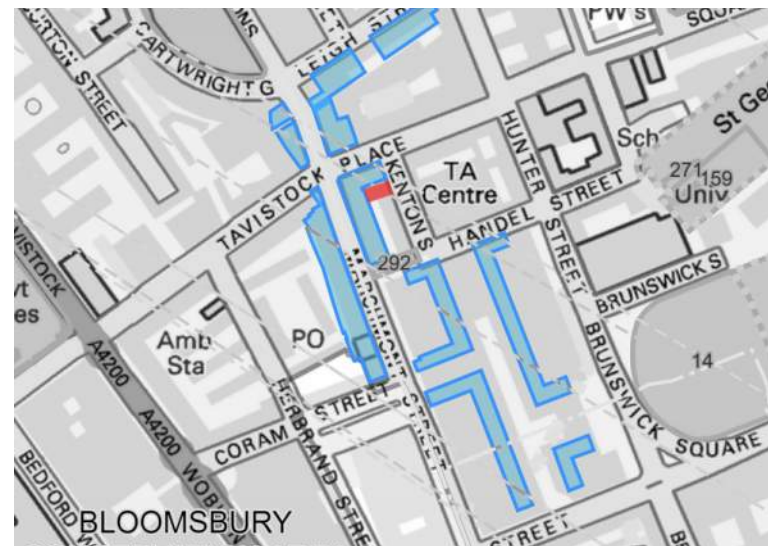


Fig. 22. Camden Policies Map, 2021 (colours redacted for clarity)

In addition to *Policy E2, Camden Planning Guidance: Employment Sites & Business Premises*, poses the additional criterion:

- **whether a lower quantum of replacement employment space is proposed as part of the development, and if so whether the nature of this space is considered to have the potential to offer equal or greater benefits to local people or businesses than the existing space.**

A lower quantity of replacement employment space is proposed. The new employment space will be situated on the lower ground floor, benefiting from ample skylight, uniform LED lighting, privacy from neighbours, accessible bathroom, and platform lift for step-free access. The space will be ideal for business types that don't require an active storefront yet demand high quality and controlled thermal, acoustic, and lighting conditions (*fig. 23*). The space will be designed and constructed to the highest market standard to ensure a pleasant and sustainable office environment. This proposal shall contribute to Bloomsbury's diverse and high quality rental offerings to the creative industry.

The proposed business space is for many reasons more beneficial to the local community than a business space on upper floors. First of all, the lower ground space resolves the neighbours' concerns over noise and loss of privacy; second, the lower ground floor business space does not detract from the visual continuity of the building's exterior, thus maintaining the beauty of the Victorian era architecture at 73-75 Kenton Street.



*Fig. 23.* Combination of uniform LED light and natural light transforms the space into a warmly-lit and comfortable studio environment.

#### 4.2.7.1 Marketing Exercise

*Camden Planning Guidance: Employment Sites & Business Premises* requires evidence that the applicant has fully explored alternative business use of the space. *Paragraph 5.39* (p.175) of the Local Plan asks the applicant to undergo a thorough marketing exercise, sustained over at least two years.

For years, the leasing of 73-75 Kenton Street was managed by Mr. David Shapiro, a chartered surveyor with over 25 years of professional experience in the central London property market. Since mid-2020, the ground, first, and second floors had all been vacated; despite Mr. Shapiro's continued marketing efforts, there had been only one inspection by a potential client interested in leasing. BKDM LLP was the only other client who contacted Mr. Shapiro, with the intent to purchase the entire building instead of renting it. A detailed professional assessment of the building's market performance up to 2021 has been provided by Mr. Shapiro, which is included as a supporting document of this application.

BKDM LLP acquired 73-75 Kenton Street in February 2021 as new owners of the property. BKDM did not reach an agreement to extend the lease with the lower ground floor tenant, Lewis & Co, who decided to vacate on June 23<sup>rd</sup>, 2021. Since then, the building has been fully vacant.

**BKDM LLP has been actively exploring options to lease the building for office, event, and other business-related uses.** The ground, first, and second floors have been marketed on long-term leasing platforms like CoStar and Realla, as well as short-term event rental platforms such as the Storefront (*fig. 25-26*). The spaces have been listed at around 20% lower than average rates in Bloomsbury, in order to attract potential tenants. There have been very few online viewings and occasional inquiries by potential clients, and we have not received any real interest nor offer to rent the spaces.

**At the time of this application, the above-ground floors of the building has been vacant over 24 months** (*fig. 24*). BKDM LLP has been deliberating between investing in a thorough upgrade of the property when market demand for the building has been close to zero, or changing the upper floors into a self-contained residence, suiting the owner's family need and revitalising 73-75 Kenton Street. The past 24 months of marketing exercise and struggles to attract renters have provided strong evidence to the owners that the second option is more logical, efficient, and overall beneficial. It has not been making sense to renovate this building for office use when it has little potential to be rented.


| Vacancy History    |               |                             |
|--------------------|---------------|-----------------------------|
| Unit               | Vacant since  | Months vacant up to (02/23) |
| Second Floor       | December 2020 | 27                          |
| First Floor        | August 2020   | 29                          |
| Ground Floor       | August 2020   | 29                          |
| Lower Ground Floor | June 2021     | 20                          |

*Fig. 24.* Vacancy history of all four floors up to date

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**73-75 Kenton St | London, LND**  
Office For Lease | 736 SF - 2,212 SF | £50.00 - £52.00/SF/YR

In the last 30 days, **57** people have seen your property **158** times. Increase your exposure to Diamond and get **1,150x**

|   |  |                                |
|---|--|--------------------------------|
| Days on Market<br><b>479</b><br><small>Started advertising 10/25/2021</small> | Listing Completeness<br><b>95%</b><br><small>last updated on 2/17/2023</small> | Exposure Level<br><b>Basic</b> |
|---|--|--------------------------------|



MANAGE PHOTOS 1/5

Days Since Last Update

Updated Today

[Edit Listing](#)

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Marketing Quality

Excellent

Want to improve?

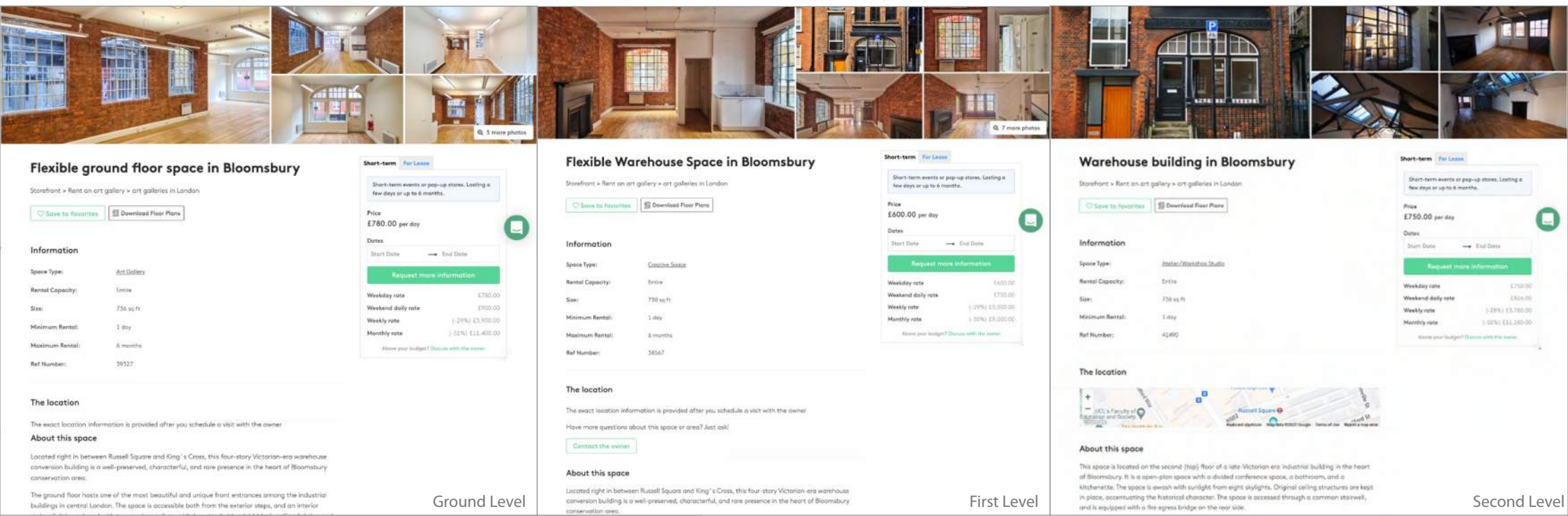
HIDE SPACES ^ REMOVE LISTING Marketing Tools:  Leads  Create Email Campaign  Listing Performance

Available Spaces MANAGE CONTIGUOUS SPACES [Add a Space](#)


| <input type="checkbox"/> | Floor & Suite | Space Available | Bldg Contig | Rent             | Status |  |
|--------------------------|---------------|-----------------|-------------|------------------|--------|--|
| <input type="checkbox"/> | GRND          | <u>736 SF</u>   | 736 SF      | <u>£50.00 SF</u> | Active | <a href="#">COPY</a> <a href="#">REMOVE</a>  |
| <input type="checkbox"/> | 1st           | <u>736 SF</u>   | 736 SF      | <u>£50.00 SF</u> | Active | <a href="#">COPY</a> <a href="#">REMOVE</a>  |
| <input type="checkbox"/> | 2nd           | <u>740 SF</u>   | 740 SF      | <u>£52.00 SF</u> | Active | <a href="#">COPY</a> <a href="#">RE</a> <span style="border: 1px solid gray; border-radius: 50%; padding: 2px;">?</span> Hel |

| <b>CoStar Platform Statistics (10/21 - 02/23)</b> |                     |                       |                          |
|---|---------------------|-----------------------|--------------------------|
| <b>Unit</b>                                       | <b>Total Viewed</b> | <b>Total Inquired</b> | <b>Total Days Rented</b> |
| All Floors  | 2069                | 2                     | 0                        |

Fig. 25. Marketing evidence on CoStar/Realla listing platform. The platform is one of the largest commercial property platforms in the UK and preferred by real estate professionals and renters.




## Your Listings




**75 Kenton St, London WC1N 1NN, UK**  
 Last Updated: Feb 17, 2023  
 Availabilities last reviewed: Feb 17, 2023  
 Public

Update the calendar
Manage
Preview



**75 Kenton St, London WC1N 1NN, UK**  
 Last Updated: Feb 17, 2023  
 Availabilities last reviewed: Feb 17, 2023  
 Public

Update the calendar
Manage
Preview



**75 Kenton St, London WC1N 1NN, UK**  
 Last Updated: Feb 17, 2023  
 Availabilities last reviewed: Feb 17, 2023  
 Public

Update the calendar
Manage
Preview

| The Storefront Platform Statistics (01/22 - 02/23) |                      |                |                   |
|--|----------------------|----------------|-------------------|
| Unit   | Total Listing Viewed | Total Inquired | Total Days Rented |
| Second Floor                                       | 221                  | 4              | 0                 |
| First Floor  | 520                  | 17             | 0                 |
| Ground Floor                                       | 615                  | 21             | 0                 |

Fig. 26. Marketing evidence on the Storefront listing platform. The Storefront is one of the fastest growing short-term rental platforms around the globe.

#### 4.2.7.2 Redevelopment of Sites that are Suitable for Continuous Business Use

**Paragraph 5.4** (p.175) of the Local Plan provides guidelines on protecting and enhancing businesses on site during redevelopment. The Council encourages redevelopments to provide higher quality employment spaces while providing other priority uses such as housing. It is also stressed that the re-provided business space should be flexible to accommodate small enterprises and growth sector businesses, such as the creative industry.

The re-purposing of 73-75 Kenton Street acknowledges the need for higher quality business spaces and, while the proposal is by its nature unable to maintain the current business floorspace, it aims to provide top quality replacement business space tailored to the creative industry. As illustrated in the design statement, the proposed lower ground floor business space will be constructed to the highest specification, with controlled lighting, acoustics, and indoor environment. The space will be ideal for uses such as architecture office, design agency, photography studio, and such. Furthermore, the lower ground floor location is compensated by higher affordability regarding rents.

**Paragraph 5.41** stresses the importance of meeting the needs of the end users. Besides the provision of appropriate business spaces, there should be clear separation between the residential and the business spaces.

The residential and business spaces maintain clear and efficient separations, as illustrated in the diagram. The lower ground office is accessed through both the front entrance and the lightwell platform lift for wheelchair access; the residence is accessed through a separate door behind the front entrance.

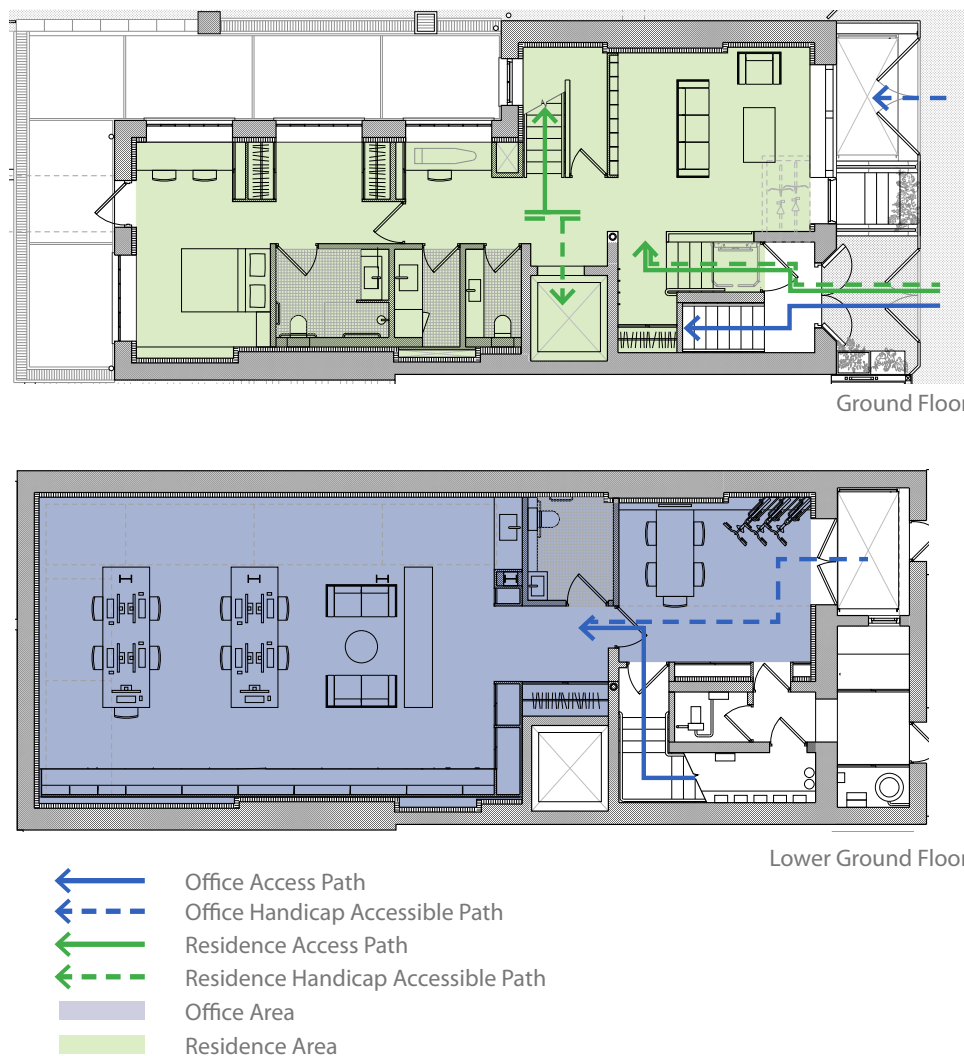


Fig. 27. Separation of Access Diagram

## 5. Conclusion

With the planning policy citations and analyses provided in this Planning Statement, we hope to demonstrate that this Change of Use application is not only consistent with National and Local planning policies, but also in line with the long-term preservation and growth of the neighbourhood surrounding 73-75 Kenton Street.

Assessed in aspects of Design, Heritage, Amenities, Housing Provision, Economic Development, Accessibility, and Sustainability, the restoration and partial conversion of 73-75 Kenton Street into a single family dwelling-house shall be a clearly beneficial change, for not only is it in keeping with the local character and typical land use, it also optimises the proper occupation of the building and contributes to a more beautiful, quiet, and secure neighbourhood.

With regards to the loss of employment space, not only have we demonstrated a 24-month period of active marketing exercise, we have also taken into account the need for diverse and generative industries in Bloomsbury as we carefully propose a lower ground floor office space designed and built to the highest specifications. Balancing the owner's need and the market trend, we are convinced that, instead of leaving the building in a still stagnant office rental market, it is better to adapt the 73-75 Kenton Street for active and long-term uses and avoid prolonged vacancies.

We hereby conclude to our best understanding that this Change of Use application satisfies the National and Local planning policies, and shall bring forth a series of positive changes to the neighbourhood and Bloomsbury Conservation Area.

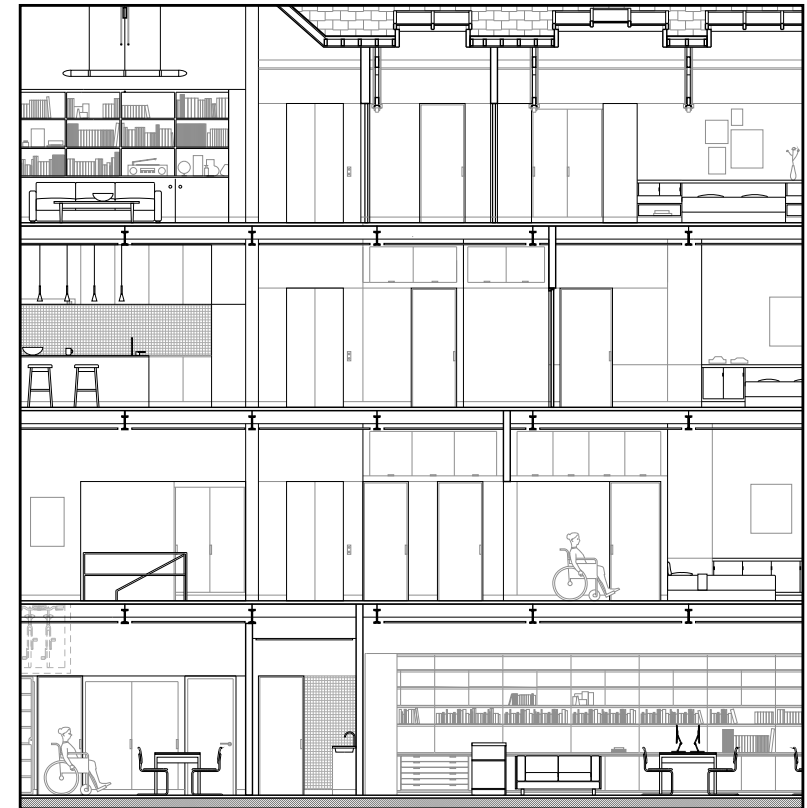


Fig. 28. Proposed Section of the Mixed-Use Property