

Town Planning Statement

160-161 Drury Lane, London, WC2B 5PN

On behalf of: McAleer & Rushe Contracts UK Ltd

Date: May 2023

NJB/MZH/SOTH/U0018131

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1 Executive Summary

- 1.1 The proposals within this application for planning permission are brought forward by McAleer and Rushe Contracts UK Limited (“MAR”, the “applicant”) and will provide an exciting opportunity to regenerate the site by delivering a high quality, sustainable office-led scheme with ground floor commercial retail use.
- 1.2 MAR are a family-owned and multi-award-winning construction and property business which has operated throughout the UK & Ireland for over 50 years, with specialist experience in delivering high quality buildings within the office, hotel, residential and student accommodation sectors.
- 1.3 With offices in Belfast and Cookstown, MAR purchased the site in July 2021 in order for it to function as their new London headquarters. Their vision is to remain as custodians of the building following development, by using part of the building themselves and leasing the remainder to other commercial occupiers.
- 1.4 The existing building received planning permission for a two-storey extension with full re-skinning of the facades in 2019. This permission has since expired.
- 1.5 Following purchase of the building in July 2021, MAR has conducted a full review of the building to deliver a sensitively designed and sustainable scheme.
- 1.6 The proposed development offers the opportunity to deliver increased, efficient, and flexible office floorspace, designed to a high quality and suitable for multiple businesses of varying sizes to allow for a greater variety of enterprises to occupy Central London office space.
- 1.7 The proposals will seek to activate the ground floor through the introduction of flexible retail use to this important street frontage in Camden and Central London, next door to the popular New London Theatre.
 - The scheme will deliver several planning benefits, including:
 - Contribution to the regeneration and transformation of the area;

- Sustainable reuse and repositioning of a building which no longer meets modern office user requirements;
- Delivering an uplift of 270 sqm (GIA) in high quality office floorspace;
- Financial contribution to Camden's affordable housing fund via payment in lieu;
- Delivering sustainable development through improvements in energy efficiency, being car-free and introducing an additional 22 cycle spaces;
- High quality design, contributing to the wider townscape and conservation area setting and local streetscape; and
- Contributing to the function and character of the area through the provision of new active public uses at ground floor level to reactivate street frontages.

1.8 The development will make a significant contribution to both Camden and this part of central London through maximising the potential of the site, providing appropriate links to and benefits for the surrounding area and existing communities and according with the Council's aspirations and objectives for the wider area.

2 Introduction

2.1. This Planning Statement is submitted in support of a detailed planning application made on behalf of McAleer & Rushe Contracts UK Limited (“MAR”, the “applicant”) for the remodelling, refurbishment, and extension of the site at 160-161 Drury Lane. This statement sets out the town planning case in support of the application. It summarises the planning history of the site and assesses the proposed development in the context of relevant planning policies and guidance.

2.2 The proposals are described in greater detail in the Development Proposals section of this statement. In summary, planning permission is sought for the:

“Demolition of existing fourth floor, replacement of fourth floor and erection of an additional storey to the top of the building, ground floor alterations including new entrances, single storey extension to the rear, removal of existing external fire escape stair to the rear, reconfiguration of existing external plant equipment and introduction of additional plant at roof level, including associated works. Planning use class E throughout the building.”

2.3 This planning statement is structured as follows:


- Section 3 – description of the site and surroundings;
- Section 4 – details of the site’s background and planning history;
- Section 5 – details of the development proposals;
- Section 6 – consultation process
- Section 7 – relevant planning policy framework
- Section 8-13 – assessment of the material planning considerations arising from the application proposals;
- Section 14- Planning Obligations and Community Infrastructure Levy; and
- Section 15 – summary and conclusions.

2.4 The proposed works are designed by Ben Adams Architects and are described in Section 5 of this statement and within the submitted Design and Access Statement. This statement should

be read in conjunction with the proposed plans and drawings; including the following documents which are submitted as part of this application:

- Planning Application Forms and Certificates, prepared by Gerald Eve LLP;
- Design and Access Statement, prepared by Ben Adams Architects;
- Existing and Proposed Plans, Elevations and Sections, prepared by Ben Adams Architects;
- Residential Study (Camden Policy H2), prepared by Ben Adams Architects;
- Environmental Noise Report, prepared by Acoustic Plus;
- Air Quality Assessment, prepared by Air Quality Consultants;
- Air Tightness Survey, prepared by Leema Tech;
- Ventilation Strategy, prepared by Caldwells;
- Daylight and Sunlight Report, prepared by Point 2;
- Transport Assessment (including Delivery and Servicing), prepared by Transport Planning and Highways Solutions;
- Framework Travel Plan, prepared by Transport Planning and Highways Solutions;
- Delivery and Servicing Management Plan, prepared by Transport Planning and Highways Solutions;
- Construction Management Plan, prepared by M&R;
- Pre-Demolition Audit, prepared by BPP Energy;
- Drainage Strategy, prepared by Ian Black Consulting;
- Structural Note, prepared by Ian Black Consulting;
- Sustainability Statement, prepared by BPP Energy;
- Energy and BREEAM Assessment, prepared by BPP Energy;
- Whole Life Carbon Assessment, prepared by BPP Energy;
- Statement of Community Involvement, prepared by London Communications Agency;
- Community Infrastructure Levy form, prepared by Gerald Eve LLP; and
- draft Section 106 Heads of Terms (included within this Planning Statement).

2.5 This statement sets out the town planning assessment of the proposed scheme and assesses it in the context of national, regional and local planning policy and guidance.

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- 2.6 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act (2004) against which development within the London Borough of Camden (LBC, the Council) must be assessed comprises: the London Plan, being the Spatial Development Strategy for Greater London, adopted by the Mayor in March 2021, and Camden's Local Development Framework (LDF). The LDF consists of Camden's Local Plan (2017), Camden Planning Guidance, Site Allocations Supplementary Planning Documents (SPD), Seven Dials Conservation Area Statement and the Proposals Map.
- 2.7 Section 3 of this statement goes on to consider the application site and its surrounding area in greater detail.

3 Site and Surroundings

- 3.1 The application site is located in the London Borough of Camden (LBC). The building has facades on two streets: Drury Lane and Parker Street. Drury Lane is a busy traffic route through the area.
- 3.2 The existing building is five storeys in height with one small basement level and was constructed in the 1980s. The site's lawful use is for Class E throughout all floors.
- 3.3 The London Plan identifies the application site within the Central Activities Zone (CAZ). The site is not located within any protected views or viewing corridors within the London View Management Framework (2012).
- 3.4 Within the Camden Local Development Framework (LDF), the site is within the London Suburbs Archaeological Priority Area and has a Central London location.
- 3.5 The site is not within a designated town centre. Both the Drury Lane and Parker Street facades at the site are within designated secondary retail frontage in the adopted Camden Local Plan (2017) and the Supplementary Planning Guidance, Town Centres and Retail (2021).
- 3.6 Although the site is located within the Seven Dials (Covent Garden) Conservation Area, the conservation area statement states that the site does not make a positive contribution to the Conservation Area. Opposite the site lies the Covent Garden Conservation Area which is within Westminster City Council's (WCC) boundary.
- 3.7 The local authority boundary between WCC and the LBC runs directly opposite the site north to south along Drury Lane.
- 3.8 The site has an excellent public transport accessibility level with the highest rating of PTAL 6b.
- 3.9 Buildings surrounding the site are of mixed scale.

- 3.10 Surrounding properties are primarily in office and residential use. Larger residential communities are predominantly located to the west in Covent Garden.
- 3.11 The site is located close to many of London's major tourist attractions including: Gillian Lynne Theatre (directly opposite the site on Parker Street frontage); Covent Garden (market, theatres and retail) to the west; West End Theatres (in all directions) and Oxford Street retail to the north-west.
- 3.12 The site is located in an area undergoing a period of significant investment and change. Parker Tower (ref: 2014/0176/P) and The Post Building (ref: 2014/5946/P) are both schemes located in Camden which demonstrate that the area is delivering mixed-use developments and transforming to provide a destination in Camden where users can live, work and play.
- 3.13 The approved scheme by Bar Gazetteers (ref: 18/07715/FULL) at the site opposite the application site, within WCC's boundary, further exemplifies the change this area is undergoing and the investment being made to enhance and promote its function and character.

4 Planning History

4.1 In this section the site's key planning history is assessed from the original permission for the building on 18 February 1985. The list is not exhaustive and includes only key planning applications made:

4.2 On 18 February 1985 planning permission (ref: P14/35/E/36129) was granted at 4-24 Parker Street & 160-161 Drury Lane for the following:

“Redevelopment of the site by the erection of a new building comprising basement, ground and 4 storeys to provide residential, offices, retail, light industry and integral garages.”

4.3 An associated listed building consent (ref: P14/35/E/3180) was also granted on 18 February 1985 for the:

“Demolition of 160-161 Drury Lane.”

4.4 On 26 June 2000 planning permission (ref: PSX0004507) was granted at 4-24 Parker Street & 160-161 Drury Lane for the following:

“Alterations to shopfront, including extension to front facades in front of existing pillars and with a new glazed design and relocation of entrance door to corner of Drury Lane and Parker Street.”

4.5 On 20 December 2007, planning permission was refused for the following at the site:

“Alterations to shopfront, including extension to front facades in front of existing pillars and with a new glazed design and relocation of entrance door to corner of Drury Lane and Parker Street.”

The cited reasons for refusal were based on the perceived harm the proposed alterations to the shopfront would cause to the character and appearance of the conservation area.

4.6 On 21 May 2008 planning permission (ref: 2008/1297/P) was granted at 4-24 Parker Street & 160-161 Drury Lane for the following:

“Alterations to the shopfront, including the relocation of entrance door to corner of Drury Lane and Parker Street.”

4.7 Several tables and chairs applications have been made, renewed and approved in respect of the external seating connected to the retail unit at 160 Drury Lane.

4.8 On 16th October 2019, planning permission (ref: 2019/2095/P) was granted at 160-161 Drury Lane for the following:

“Demolition of existing 4th floor and erection of two storey plus roof extension; full re-skinning of the facades; ground floor alterations including new entrances and shop fronts; single storey rear extension to closet wing; and reconfiguration of existing plant equipment and rear escape stair. All in connection with the use of the building as offices (Class B1a) at part ground and upper floors with ground and partial basement level commercial unit in flexible retail or restaurant/café (Class A1/A3).”

4.9 This permission has not been implemented and has since expired on 16 October 2022.

Surrounding area

4.10 As previously mentioned, directly opposite the site lies “Development Site At Land Bounded By Drury Lane, Dryden Street, Arne Street And Shelton Street”, within the boundary of WCC. An application for planning permission (ref: 18/07715/FULL) at this site received planning permission on 13 February 2019 for the following development:

“Removal of existing third and fourth floor levels and roof top structures and partial demolition of Shelton Street elevation (third floor only); construction of new floorspace and internal reconfiguration resulting in a part five and part six storey building with roof top plant enclosure, to provide flexible commercial use including retail (Class A1), financial and professional services (class A2) restaurant (class A3), office (class B1) and /or assembly and leisure (class D2) at basement and ground floor level and office use (Class B1) at first to fifth floor levels; refurbishment of external elevations; roof terraces, plant, cycle parking and facilities for access and servicing.”

5 Development Proposals

5.1 This application seeks planning permission for the following proposed development:

“Demolition of existing fourth floor, replacement of fourth floor and erection of an additional storey to the building, ground floor alterations including new entrances, single storey extension to the rear, removal of existing external fire escape stair to the rear, reconfiguration of existing external plant equipment and introduction of additional plant at roof level, including associated works. Planning use class E throughout the building.”

5.2 The proposed development would see the removal and rebuilding of the existing top (5th) floor of the building; replacement windows throughout the building, addition of one storey to create a six storey building. The ground floor façade would see the removal of the columns, bring the building line out to match the floors above. Internally, the ground floor units would be reconfigured to provide a café and flexible office workspace.

5.3 The scheme will deliver a number of planning benefits including:

- Contribution to the regeneration and transformation of the area;
- Sustainable reuse and repositioning of a building which no longer meets modern office user requirements;
- Delivering an uplift of 270 sqm (GIA) in high quality office floorspace;
- Delivering sustainable development through improvements in energy efficiency, being car-free and introducing an additional 22 cycle spaces;
- High quality design, contributing to the wider townscape and conservation area setting and local streetscape; and
- Contributing to the function and character of the area through the provision of new active public uses at ground floor level to reactivate street frontages.

5.4 The development proposals have been subject to extensive pre-application consultation with LBC planning, urban design and conservation officers (ref. 2021/5640/PRE). The project team met with Camden on three occasions, initially via a virtual meeting, followed by two in-person meetings and included a tour of the building. At all times, the team has sought to respond to the comments received and incorporate them into the scheme accordingly.

Land Use Summary

5.5 The proposed land use (GIA sqm) at the site is as follows:

Land Use	Existing (sqm GIA)	Proposed (sqm GIA)	Net change (sqm GIA)
Class E	1,221	1,491	270

6 Consultation

- 6.1 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.
- 6.2 This is reiterated by the National Planning Policy Framework (NPPF) July 2021, which states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussions enable better coordination between public and private resources and improve outcomes for the community (paragraph 39).
- 6.3 Consultation is recognised as an essential tool for balancing the views and needs of different interest groups and securing mutually compatible solutions and as such, has played an important role in the preparation of this planning application
- 6.4 NPPF paragraph 41 reiterates that the more issues that can be resolved at the pre-application stage, the greater the benefits.
- 6.5 The development proposals have been subject to extensive consultation between January 2022 – April 2023. Those consulted include:
- The London Borough of Camden planning and design officers
 - Covent Garden Community Association (CGCA)
 - Holborn and Covent Garden Ward Councillors; and
 - Local residents and businesses.

Pre-application Discussions

- 6.6 Formal pre-application meetings in respect of these development proposals have been held with LBC planning, design and conservation officers:
1. Virtual meeting via Teams on 7 January 2022;
 2. In-person, onsite meeting on 28 February 2022; and
 3. In-person, onsite meeting on 11 January 2023.

- 6.7 Several iterations of the proposed design were subject to thorough review throughout the pre-application stage and the development proposals have evolved throughout the past 15 months to incorporate comments received in relation to design, wherever possible.
- 6.8 The initial scheme was first designed by TODD Architects in late 2021 and was discussed initially via a virtual meeting in January 2022, followed by an in-person, on site tour on 28 February 2023. Officers however, found the design of the top floor glazing to be overly glazed and out of character for the Seven Dials Conservation Area, which was considered to have buildings more of a warehouse style.
- 6.9 Following an internal review of the proposals in Summer and Autumn 2022, Ben Adams Architects were brought onto the scheme to design a scheme fit for the site and in line with the architectural style of the Seven Dials Conservation Area.
- 6.10 A follow-up in person meeting took place on 11 January 2023 to review Ben Adams' scheme which included a proposed design much more in line with a warehouse aesthetic and appropriate use of materiality and glazing.
- 6.11 The formal pre-application response was received from LBC on 9 February 2023, which stated that the council had no objections to the principle of new office floorspace and that the proposed extension, remodelling of the existing fourth floor, elevational alterations, including upper floor windows and ground floor facades would be acceptable in the context of policies for urban design and conservation.

Local Stakeholder Engagement

- 6.12 Further to pre-application discussions with the council, the applicant also undertook public pre-application engagement and has continued to engage with residents and stakeholders to keep them informed of any changes to the schemes and programme for development. The methods of engagement include:
- A letter drop was issued to local neighbours and businesses surrounding the site, informing them of an in-person public consultation event held at the site.

- Emails sent promoting engagement and the public consultation event to key stakeholders.
- An in-person, public consultation event held on Wednesday 8 March 2023.
- Drop in sessions, held over two days on 8 March and 10 May 2023.
- Follow up newsletter to the local community sent to surrounding addressed.
- Meeting with Covent Garden Community Association.
- Consultation boards have been kept permanently on window display on the ground floor of the site following the public consultation event so the public can review the proposals outside of the consultation day.
- Dedicated email address to leave comments or request further information on development proposals.
- Opportunities for stakeholders to ask further questions at dedicated follow up meetings, upon request.

6.13 Further details of the engagement approach and activities undertaken to engage with local stakeholder and the community in relation to the proposals are set out in the respective Statement of Community Involvement (SCI).

6.14 Overall, the SCI demonstrates that a meaningful engagement process was undertaken in respect of the proposals, which has resulted in the design team being able to capture consultee comments and evolve the scheme accordingly.

6.15 The applicant is committed to maintaining an open dialogue with locals and stakeholders throughout the determination and construction phases of the proposed development.

7 Planning Policy Context

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.
- 7.2 The Statutory Development Plan for the purposes of this application consists of:
- i. The London Plan. The London Plan presents the Mayor’s spatial development strategy for London. This document has been consolidated with alterations since 2016. Hereinafter this will be referred to as the London Plan (“LP”).
 - ii. The Camden Local Development Framework (LDF). The LDF is made up of Camden’s Local Plan (2017) and various adopted Camden Supplementary Planning Guidance documents.
- 7.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

National Planning Guidance

The National Planning Policy Framework (NPPF) 2021

- 7.4 The NPPF published in July 2021 sets out the Government’s economic, environmental and social planning policies for England. It summarises in a single document all previous national planning policy advice. Taken together, these policies articulate the Government’s vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 7.5 The NPPF sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities. The NPPF is a material consideration in the determination of planning applications.

National Guidance – Planning Practice Guidance (‘PPG’) 2021

- 7.6 In March 2014, the Department for Communities and Local Government launches the web-based planning practice guidance resource. This aims to provide planning practice guidance which is useable in an up-to-date and accessible manner.
- 7.7 The PPG outlines how government planning practice should be followed and interpreted in accordance with the principles of the NPPF. Regarding decision making, the guidelines set out in the PPG are a material consideration and accordingly, should carry weight in the determining of planning applications.

Regional Planning Policy

The London Plan (2021)

- 7.8 The London Plan is the overall strategic plan for Greater London, defined to include the 32 Boroughs and the City of London. The aim of the London Plan is to set out a framework to coordinate and integrate economic, environmental, transport and social considerations over the next 20 to 25 years. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas and forms part of the statutory development plan.
- 7.9 The London Plan sets out the strategic functions of the CAZ. The strategic priorities for the CAZ as set out at Policy SD4 seek to enhance and promote the unique international, national and London-wide roles of the CAZ, supporting the distinct offer of the Zone based on a rich mix of local as well as strategic uses and forming the globally iconic core of one of the world's most attractive and competitive business locations.
- 7.10 The growth and management of the city form the major challenge and overarching concern of the London Plan and are prioritised to allow London to excel among global cities within the context of significant rates of development and population increases. The detailed objectives of the Plan seek to ensure that London should be:
- A city that meets the challenges of economic and population growth;
 - An internationally competitive and successful city;
 - A city of diverse, strong, secure and accessible neighbourhoods;
 - A city that delights the senses;
 - A city that becomes a world leader in improving the environment; and

- A city where it is easy, safe and convenient for everyone to access, jobs, opportunities and facilities.

Local Planning Policy

Camden Local Plan (2017)

7.11 At the local level, Camden’s Local Plan (2017) was adopted by Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

Supplementary Planning Guidance

7.12 Other relevant LBC Supplementary and Design Guidance of relevance to this application includes:

- Camden Planning Guidance- Design (January 2021);
- Camden Planning Guidance- Housing (January 2021);
- Camden Planning Guidance- Energy efficiency and adaption (January 2021);
- Camden Planning Guidance- Town Centres and Retail (January 2021);
- Camden Planning Guidance- Amenity (January 2021);
- Camden Planning Guidance- Air quality (January 2021);
- Camden Planning Guidance- Transport (January 2021);
- Camden Planning Guidance- Developer Contributions (January 2021);
- Camden Planning Guidance- Employment Sites & Business Premises (January 2021);
- Camden Planning Guidance-Planning for health and wellbeing (January 2021).

Site Specific Allocations

7.13 Within the London Plan, the site is located in the Central Activities Zone (“CAZ”). The London Plan notes that the CAZ contains a unique cluster of vitally important activities including central government offices, headquarters and embassies, the largest concentration of London’s financial and globally-orientated business services sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media. The London Plan identifies that the Mayor and boroughs should inter alia recognise that the CAZ is the heart of London’s world city offer and promote and coordinate

development so that together they provide a competitive, integrated and varied global business location.

- 7.14 On the LDF 'Policies Map Alterations' the application site is located in the Central London Area. The site is also designated as within the London Suburbs Archaeological Priority Area.

Legislative Framework

- 7.15 Given the site's location within a conservation area, statute regarding the historic environment is relevant.

- 7.16 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Principal Planning Matters

- 7.17 The development proposals have been assessed against the following principal planning matters:
- i. Land Use;
 - ii. Design;
 - iii. Townscape and Heritage;
 - iv. Environment and Sustainability;
 - v. Amenity; and
 - vi. Transport.

8 Land Use

- 8.1 This section assesses the proposals against relevant national, regional and local land use planning policies.
- 8.2 Paragraph 118 of the NPPF states that planning decision should promote and support the development of under-utilised land and buildings. The NPPF also promotes mixed-use developments and encourages patterns of growth which focus significant development in locations which are, or can be made, sustainable.
- 8.3 The site is located within the London Plan defined CAZ and Camden's Central London Area.
- 8.4 London Plan Policy GG2 states that to create successful, sustainable mixed-use places that make the best use of land, those involved in planning and development must enable the development of brownfield land, prioritising sites which are well connected. Policy GG2 goes on to state the need to understand what is valued about existing places and use this as a catalyst for growth, renewal and place-making, and in the application of a design-led approach to determine the optimum development capacity of sites.
- 8.5 Within Policy GG2 the Mayor emphasises the need to understand what is valued about existing places and use this as a catalyst for growth, renewal and place-making, and in the application of a design-led approach to determine the optimum development capacity of sites.
- 8.6 Policy SD4 of the London Plan states that the unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions and local uses, should be promoted and enhanced where appropriate. Policy SD4 further states that the nationally significant and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.
- 8.7 Policy G1 of the Local Plan states the Council deliver growth by securing high quality development and promoting the most efficient use of land and building in Camden by supporting development that makes best use of its site, taking into account quality of design,

its surroundings, sustainability, amenity, heritage, transport accessibility and ant other considerations relevant to the site.

8.8 Policy E1 of the Local Plan explains that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.

8.9 The policy goes on to state that new office development will be directed to the growth areas and Central London. Part I of the policy recognises the importance of other employment generating uses, including retail. Furthermore, the Council will support proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites.

8.10 Local Plan Policy E2 encourages the provision of employment premises and sites in the borough and seeks to protect premises or sites that are considered suitable for continued business use provided that:

- The level of employment floorspace is increased or at least maintained;
- The redevelopment retains existing businesses on the site as far as possible, and in particular industrial, light industrial and warehouse/logistic uses that support the functioning of the CAZ or the local economy;
- It is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy and will be to a sustainable location;
- The proposed premises include floorspace suitable for start ups, small and medium sized enterprises, such as managed affordable workspace where viable;
- The scheme would increase employment opportunities for local residents, including training and apprenticeships;
- The scheme includes other priority uses, such as housing, affordable housing and open space, where relevant and where this would not prejudice the continued operation of businesses on the site; and
- For larger employment sites, any redevelopment is part of a comprehensive scheme.

Assessment

- 8.11 The proposals for 160 – 161 Drury Lane involve the intensification of the existing employment use at the site in line with national, regional and local policy. Specifically, Local Plan Policy E1, part I is met, through the refurbishment and extension of the existing building to provide a total of 1,491 sqm (an uplift of 270 sqm GIA) across part of the ground floors and the new roof level 5.
- 8.12 The existing building is currently in office use, with ground floor retail (Use Class E throughout) and therefore the principle of class E at the site is already established.
- 8.13 The site is located within the CAZ and is highly accessible via public transport (PTAL 6b – the highest level). As such an increase in office floorspace in this location would again be supported in principle.
- 8.14 The proposed development would meet the tests of Local Plan Policy E2 in the following ways:
- The proposed development would increase the level of employment floorspace at the site by 270 sqm GIA;
 - The type of businesses to use at the site will be maintained as a result of the development (i.e. office class E tenants);
 - The proposals have been designed to create an office building which will provide flexible and adaptable high quality office floorspace. The open floorplate can then be sub-divided as required by tenants;
 - Endeavours will be made to ensure apprentices are on site during the construction phase; and
 - The scheme will provide a payment in lieu of housing at the site (see discussion “Maximising the supply of housing from mixed use schemes” further below within this section and the accompanying Residential Study, prepared by Ben Adams Architects). The sum has been provisionally agreed with LBC at pre-application stage and is included in the proposed Heads of Terms.

Conclusion

- 8.15 The proposals will intensify the commercial floorspace at the site and they will lead to an increase in the type of companies that can operate at the site and increase the variety of job provision in the area; significantly contributing to the character and function of the CAZ.
- 8.16 The proposals will facilitate modern occupier demands and is in accordance with the aspirations of the London Plan, which seeks to renovate and renew office stock; increasing and enhancing the quality and flexibility of London's office market.
- 8.17 The proposed development is therefore in accordance with NPPF, London Plan policies GG2, SD4 and Camden Local Plan policies G1, E1 and E2.

Maximising the supply of housing from mixed use schemes

- 8.18 Camden Local Plan Policy H2 state that, where non-residential development is proposed, the Council will promote the inclusion of self-contained homes as part of a mix of uses. In the Central London Area (where the site is located) where development involves additional floorspace of more than 200sqm (GIA), Camden will require 50% of all additional floorspace to be self-contained housing, subject to the following considerations.
- 8.19 According to Local Plan policy H2, in the Central London Area, the Council will consider whether self-contained housing is required as part of a mix of uses taking the following into account:
- a) The character of the development, the site and the area;
 - b) Site size, and any constraints on developing the site for a mix of uses;
 - c) The priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
 - d) Whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;
and
 - e) Whether the development is publicly funded or serves a public purpose.
- 8.20 The policy goes on to state, where housing is required as part of a mix of uses, the Council will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floor space or more, is proposed. Where the Council is satisfied that providing

on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

8.21 In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, the Council will take into account criteria a – e, as listed above and the following additional criteria:

- f) The need to add community safety by providing an active street frontage and natural surveillance;
- g) The extent of any additional floorspace need for an existing user;
- h) The impact of a mix of uses on the efficiency and overall quantum of development;
- i) The economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- j) Whether an alternative approach could better meet the objectives of this policy and the Local Plan.

Assessment

8.22 The proposals result in an uplift of 270 sqm (GIA). Under policy H2, a total of 135 sqm (GIA) of on-site residential would therefore be required.

8.23 A Residential Study provided by Ben Adams Architects, submitted in support of this application, demonstrates architecturally how the site and proposed development are inappropriate for the provision of residential units. The Residential Study has reviewed two possible options to include residential development within the existing building, however, finds that both options would fail to make best use of the building or area available.

8.24 The first option tests having two ground floor apartments, which would offer the best use of the available GIA and would avoid the need of having a secondary core. It would however, be single aspect in part, would not have access to amenity space and would cause security concerns, given that the residential units would be accessed from ground floor level, off a busy commercial-led street and with the theatre entrance directly opposite. The townscape impact of having ground floor residential units would also be significant to Drury Lane.

- 8.25 The second option tests having one residential unit on the third floor however, only 50% of the GIA available would represent meaningful residential use (accommodation and not core). It would also have a detrimental effect on the rest of the office floors within the building, as separate residential and office lift and stair cores would reduce the office floorspace by 18sqm per floor. The loss of desk space would be significant and detrimental for this small and narrow building.
- 8.26 The Residential Study therefore demonstrates that provision of housing on this site would harm the function and quantum of commercial business uses or the townscape of the Seven Dials and Covent Garden areas; it would also result in a less than optimum use of the site, contrary to the objectives of the NPPF and Camden Local Plan on making the best use of land.
- 8.27 As acknowledged in the Local Plan, the Council gives priority to housing but not to the extent that this priority should override the need to protect some non-residential uses across the borough, nor should its inclusion within a development's mix of uses adversely impact on the efficiency of an overall quantum of development. It is also noted that priority for housing needs to be considered in the context of the characteristics of specific areas, sites and properties.
- 8.28 The committee report of 2019 scheme (ref. 2019/2095/P) paragraph 5.4 and 5.5 also acknowledges that the site is not suitable for the provision of on-site housing:

"...the building has a relatively narrow but long footprint and includes only one core. In order to meet best design practice, any onsite residential would usually be expected to feature a dedicated ground floor entrance and core as well as ancillary ground floor storage areas. The spatial requirements of such provision would effectively render the overall scheme unviable as it would halve the office uplift but also require the loss of existing office space to make way for these elements."

"With this in mind, it is acknowledged that the provision of onsite housing on this site would harm the function and quantum of business uses onsite and would result in a less than optimum use of the site in land use terms. Given that the development is not of a significant scale and would provide additional employment space within the CAZ (another priority land use in the Borough), the lack of onsite provision is consequently accepted."

8.29 Notwithstanding this, the project team has examined the potential for housing to be provided on site in accordance with Policy H2 and concluded that in this instance too, it is not feasible to introduce residential floorspace as part of the proposals.

8.30 The following paragraphs respond to the policy H2 criteria, where applicable.

8.31 **a) The character of the development, the site and the area;**

8.32 There is limited capacity to accommodate residential development on site as the proposed development is a refurbishment and minor extension of an existing office building.

8.33 Furthermore, the site is in the CAZ where office use is given greater weight than residential use in the adopted London Plan CAZ SPG. Employment floorspace in this location is therefore protected and promoted.

8.34 **b) site size, and any constraints on developing the site for a mix of uses;**

8.35 The existing floorplates are designated for commercial use and are not readily adaptable for residential use having regard to London Housing SPG standards.

8.36 The project team has investigated the potential to provide residential accommodation at the site and found the site presented a number of design limitations for delivering residential accommodation:

- Fire safety regulations requiring separate core for the two different uses (stairs and lift) which will reduce the amount of useability of the existing floorplates;
- Loss of active frontage along Drury Lane and Parker Street;
- Compromised office space at all levels to make space for new residential core or requirements for vertical mechanical ventilation (dependant on where residential units would be located);
- Limited scope for mixed tenure due to nature of core;
- Residential units will have limited outlook/access to daylight, outdoor amenity space and be single aspect if they were provided on the ground floor;

- Residential units proposed on the ground floor would have ventilation and security issues for windows; and
- Residential use proposed on upper floors would detrimentally reduce office floorplates over 4 floors at 18sqm / floor; and
- Residential units proposed on upper floors would inefficiently require 50% of the allocated residential GIA for the space instead of useable living space.

8.37 f) the need to add to community safety by providing an active street frontage and natural surveillance

8.38 The proposal seeks to provide active street frontages and natural surveillance through the design of the ground floor retail unit and refurbishing the building generally. If residential accommodation were to be provided, an additional core would be required which would inevitably reduce the level of active street frontage around the perimeter of the building as additional space would be required for a dedicated entrance, reducing the amount of active frontage.

8.39 h) the impact of a mix of uses on the efficiency and overall quantum of development

8.40 Local Plan policy E1 sets out the need to protect and enhance existing employment sites. The site is extremely well connected in terms of public transport accessibility. Policy G2 seeks to focus Camden's growth in the most suitable locations and manage it to make sure the borough delivers on its opportunities and benefits and achieves sustainable development, while continuing to preserve and enhance the features that make Camden such as attractive place to live, work and visit.

8.41 Policy E1 considers that the Council will secure a strong economy in Camden through safeguarding existing employment sites and premises in the Borough that meet the needs of modern industry and other employers; safeguarding the borough's main industry area; encouraging a mix of employment facilities and types including the provision of facilities suitable for a mix of small and medium sized enterprises; support local enterprise development, employment and training schemes for Camden residents; recognise and encourage the concentrations of creative and cultural businesses in the Borough.

- 8.42 Policy E2 seeks to encourage and protect employment sites and an Article 4 direction seeks to ensure that the existing building cannot be converted into residential under permitted development rights.
- 8.43 The introduction of residential use within the proposed development would adversely impact on the proposed mix of uses reducing the quantum of usable commercial floorspace delivered by the proposed scheme, making the scheme unviable and thereby preventing the delivery of increased, flexible office floorplate to the Borough, which is another priority land use for Camden.
- 8.44 The Applicant does not own any alternative sites within the Borough which could be used to accommodate the residential development.
- 8.45 **j) whether an alternative approach could better meet the objectives of this policy and the Local Plan**
- 8.46 Office use is a land use priority within Camden. The proposed development would deliver an increase of 270 sqm GIA of high quality, fit for purpose, flexible office floorspace to meet market needs and in line with the wider economic and employment objectives of Camden's Local Plan.

Conclusion

- 8.47 In this case, the optimum way to meet the Local Plan objectives and that of policy H2 would be to make a payment in lieu contribution to the borough which could then be used to deliver affordable housing at more appropriate sites in the Borough. Excluding residential uses from the proposals ensures that this policy objective is met and that the development opportunity for commercial floorspace at the site is maximised in line with the wider objectives of the NPPF and Camden's Local Plan. Office use is another priority land use in Camden and the provision of 1,491 sqm of office floorspace in the Central Activities Zone should be wholly supported.

- 8.48 The Residential Study assessment has demonstrated that the proposed development should not lead to a requirement to provide on-site residential accommodation.
- 8.49 The 2019 consented scheme equally demonstrated that on-site provision of residential accommodation would not be the best use of the site and that a payment-in-lieu was acceptable.
- 8.50 Whilst McAleer and Rushe do not own any sites within LB Camden to provide the residential accommodation offsite, an off-site contribution has been offered and discussed with Camden Council at pre-application stage.
- 8.51 The pre-application feedback received has estimated a payment-in-lieu amount c. £247,500, based on an uplift of 330 sqm GIA (Note: the proposed net uplift in floorspace is 270 sqm) and therefore, the proposed development is considered in line with Local Plan policy H2.

9 Environment and Sustainability

- 9.1 This section of the Statement considers the planning policies and material considerations associated with the energy and sustainability aspects of the proposed development.
- 9.2 The NPPF sets out the Government's overarching planning policies regarding the delivery of sustainable development through the planning system. Chapter 14 of the document identifies the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 9.3 In accordance with national level objectives, the London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 9.4 In accordance with National level objectives, the London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 9.5 Policy SI 2 requires new development to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
- a. Be lean – use less energy;
 - b. Be clean - supply energy efficiently;
 - c. Be green – use renewable energy.
 - d. Be seen - monitor, verify and report on energy performance.
- 9.6 At a local level, through Local Plan Policy CC1 Camden requires all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 9.7 Local Plan Policy CC2 requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures.

9.8 Local Plan Policy CC2 also promotes the incorporation of sustainable design and construction measures within developments.

9.9 In January 2021 LBC updated the Camden Planning Guidance 'Energy Efficiency and Adaptation' to ensure that the Council's commitment to reducing carbon emissions is achieved.

Assessment

9.10 The proposed development has been undertaken with the focus on sustainability and energy in line with the Local Plan policies and the London Plan 2021.

9.11 The London Plan 2021 sets a zero-carbon with a minimum of 35% improvement for developments, which is achieved by:

- A new roof
- New glazing
- Highlight efficient air source heat pumps for space heating and cooling
- New LED lighting
- Air source heat pumps (air to water) technology for DHW.

9.12 A review of the potential renewable sand the feasibility of connecting to heat network has been undertaken. The development achieves a betterment of carbon reduction from the baseline specification.

9.13 Local Plan policies are also met using a mixture of passive design fabric elements, efficient plant and services to provide a good indoor environment for occupants and neighbours.

9.14 A simple review on the overheating has also been evaluated using the GLA spreadsheet which shows that the actual building has a lower cooling demand than the notional (baseline) model.

9.15 Results from the models should the Be Clean, Be Lean, Be Green process with an overall 48% improvement on the notional existing building, and a 30% reduction between the Baseline and the Be Lean alone.

9.16 Conclusion

9.17 In conclusion, the Energy and Sustainability Statement demonstrates that the proposed development complies with planning policies from national, regional and local level and has incorporated sustainable and energy efficient qualities. The development will provide a vibrant, sustainable and carbon efficient contribution to Camden.

10 Design

- 10.1 This section reviews the proposals against relevant national, regional and local planning policy in terms of design.
- 10.2 The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development. Paragraph 126 of the NPPF states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 10.3 Although visual appearance and the architecture of individual buildings are important factors, Paragraph 130 of the NPPF also promotes: the functionality of a development over its lifetime and not only the short term; sensitive design that is sympathetic to local character and history whilst not preventing or discouraging appropriate innovation or change; creating places that are safe, inclusive and accessible and which promote health and wellbeing.
- 10.4 London Plan Policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites. Incremental densification is encouraged by policy D3. The policy also states that proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, shape and appearance with regard to street hierarchy, building types, forms and proportions.
- 10.5 Furthermore, Policy D3 Parts 5 to 10 require safe, secure and inclusive environments, active frontages and for buildings to generate liveliness and interest. Indoor and outdoor environments should be comfortable and inviting for people to use.
- 10.6 Policy D3 Part 11 requires proposals to respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character. D3 part 12 states that architecture should pay special attention to detail and consideration should be given to the practicality of use, flexibility, safety and building lifespan. Part 13 of the policy specifically requires that proposals aim for high sustainability standards and take into account the principles of the circular economy.

10.7 London Plan Policy D4 requires development proposals to deliver high quality design and place-making and to be thoroughly scrutinised by borough planning, urban design and conservation officers.

10.8 London Plan Policy D5 states that development proposals should achieve the highest standards of accessible and inclusive design.

10.9 At a local level, Camden Local Plan Policy D1 seeks to secure high quality design in development and to ensure that new developments are attractive, safe, and easy to use. The Council will require development:

- a) Respects local context and character
- b) Preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c) Is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d) Is of sustainable and durable construction and adaptable to different activities and land uses;
- e) Comprises details and materials that are of high quality and complement the local character;
- f) Integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g) Is inclusive and accessible for all;
- h) Promotes health;
- i) Is secure and designed to minimise crime and antisocial behaviour;
- j) Responds to natural features and preserves gardens and other open space;
- k) Incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping;
- l) Incorporates outdoor amenity space;
- m) Preserves strategic and local views;
- n) For housing, provides a high standard of accommodation; and

o) Carefully integrates building services equipment.

10.10 Additionally, policy D1 states the Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

10.11 Camden has also published its Design CPG (2021) which established design principles to be used in the assessment of development proposals. The document states that the following principles should be considered for extensions to non-residential developments and that regard should be had to ensure that the design is sensitive and appropriately designed and does not spoil the appearance of the property or harm the amenity of the area:

- Having regard to the scale, form and massing of neighbouring buildings;
- Using materials and detailing that are sympathetic to the host building and buildings nearby;
- Respecting and preserving existing architectural features;
- Respecting and preserving the historic pattern where it exists and the established townscape of the surrounding area, including the ratio of built to unbuilt space;
- The effects of the proposal on the amenity of adjacent residential properties with regard to daylight, sunlight, outlook, light pollution/spillage, privacy or the working conditions of occupants of adjacent non-residential buildings;
- The desirability of retaining existing areas of landscaping (or areas that can be enhanced) to meet the amenity needs of works, e.g. for social interaction;
- The effects of the scheme on important local views; and
- Making use of sustainable materials wherever possible taking into account their lifespan, environmental performance and durability.

Assessment

10.12 Ben Adams Architects has designed a coherent and legible scheme of a warehouse aesthetic which respects the character and appearance of the surrounding area and provides an enhanced frontage to both the busy Drury Lane and quieter Parker Street.

10.13 A detailed Design and Access Statement (DAS) has been submitted to accompany this planning application; The DAS sets out in detail the key design matters which have been considered as part of the proposals.

10.14 The proposals has been discussed extensively at pre-application stage with Camden officers (ref. 2021/5640/PRE). During the pre-application process, the following changes have been made:

New 5th floor mansard roof level

10.15 The new 5th floor mansard roof level has gone through several design iterations to match the surrounding warehouse aesthetic, reduction in glazing and also includes punched and arched windows, creating visual interest for this location on Drury Lane. The arched window can be found frequently in the immediate vicinity of Parker Street and more widely in the conservation area. The proposed materials will be a slate or metal tile in line with other roof materials found in the conservation area. It is also set back to create a slight recess to the roof level and echoes the treatment of this level in the surrounding conservation area.

Replacement 4th floor level

10.16 The replacement 4th floor has the same rhythm as the remaining brick elements of the building, which reinforces the warehouse form.

Middle section of the building

10.17 Whilst the intention was always to retain the existing brick façade, crittal style windows are introduced throughout the building in order to enhance the existing warehouse aesthetic. The window style is maintained across the addresses to create a clear language for the building. Retaining the existing brickwork is also considered a more sustainable option than to reskin the façade in its entirety.

Ground floor

10.18 The columns are proposed to be removed, along with the existing light grey render and a new pink concrete base is introduced at ground floor with windows punched into the face and creating deep reveals and a characterful street level presence. The removal of the pillars are critical to creating an active frontage and importantly, to reduce the amount of anti-social behaviour currently being experienced on site, such as littering, rough sleeping and informal smoking spot.

Demarcation of addresses

10.19 Demarcation of the addresses at Parker Street and Drury Lane. The visual appearance of the building changes on the ground floor, with arched windows introduced to the Parker Street addresses and a more domestic scale and style is introduced into the design reflecting its location on a more residential street. The arched windows tie into the arched windows being proposed on the new top floor and therefore, whilst there is a subtle change to mark the difference in addresses, the building continues to read as one.

Corner design

10.20 The corner design of the building is reinforced by unifying the windows vertically on the corner across two floors, creating a subtle nod to the local warehouse 'loading bays' whilst also referencing the importance of the feature corner in the surrounding context.

Rear elevation

10.21 It is proposed to demolish the existing rear fire escape which is considered an eyesore and detrimental to the amenity of the residential uses surrounding the site. The proposed fire escape will be encased within the building.

10.22 As per the 2019 scheme, it is also proposed to extend the existing rear single storey extension by one storey.

Conclusion

- 10.23 The pre-application feedback confirms that officers welcome the improvements made to the building and particularly, the increase solidity and playful character of the new roof level; the treatment of the windows to the corner which give the building more prominence as does the slim crittal style frames to retain the warehouse character of the existing building.
- 10.24 At street-level, officers were pleased to see the façade has an improved relief and depth, adding interest and improving the hierarchy of streets and the definition between the addresses on Parker Street is also welcomed.
- 10.25 In conclusion, the design of the proposed development is acceptable and is considered to be in line with the NPPF, London Plan policies (D3, D4, D5), Camden Local Plan policy D1, as well as Camden CPG design guidance for extensions to non-residential buildings.

11 Heritage

- 11.1 This section reviews the proposals against relevant national, regional and local planning policy in terms of townscape and heritage.
- 11.2 Paragraph 194 of the NPF states, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affects, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 11.3 Paragraph 197 of the NPPF states that in determining applications, local planning authorities should take into account of:
- a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
 - b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) The desirability of new development making a positive contribution to local character and distinctiveness.
- 11.4 When considering the impact of a proposed development on the significance of a designated heritage asset, Paragraph 199 of the NPPF states, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 11.5 Paragraph 202 of the NPPF goes to on say, where a development proposal will lead to less than substantial harm to the significance of a designated heritage assets, this harm should be weighed against the public benefits of the proposal including, where appropriate securing its optimum viable use.

11.6 Local Plan policy D2 states that the Council will preserve and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas. For conservation areas, the Council will:

- Require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- Resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- Preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

11.7 The Seven Dials area was laid out at the end of the 17th century. According to the conservation area statement, the significance of the Seven Dial (Covent Garden) conservation area lies in its highly distinctive radiating street pattern.

Assessment – heritage assets

11.8 Whilst the site is not a listed building, it is located in the Seven Dials conservation area and is adjacent to Westminster City Council's Covent Garden Conservation Area. As a result, the character and appearance of both conservation areas must be considered.

11.9 The refurbishment and extension of the building has been carefully designed to both respect and reflect the heritage of the site and the surrounding area. This is further detailed in the Design and Access Statement. The conservation area appraisals thoroughly reviewed.

11.10 The pre-application feedback acknowledges that the building currently makes a neutral contribution to the character and appearance of the area and that the contribution is preserved by the proposals. The building would perceptibly increase in height, but the setback of the uppermost storey and its cladding materials mitigate against the visual impact of this increase and the addition of a set-back storey does not result in any heritage harm.

11.11 The pre-application continues by stating that a seven-storey building has recently been granted permission (the 2019 scheme) and therefore the principle of the height has already

been established. The officer considers that the proposed massing, form and materials of the current proposals are not considered to harm the character and appearance of the conservation area.

- 11.12 Conclusively, it is considered that the proposals will maintain the character and appearance of the Seven Dials conservation area and will deliver significant public benefits through improving the appearance of the existing building, creating new additional jobs at the site and animating and activating this corner and replacing the inactive and bland existing façade.

Assessment - views

- 11.13 A through assessment of the roofscape at the site and the surrounding area formed a foundational part of the design development for the scheme.
- 11.14 Views looking north along Drury Lane and west along Parker Street have been examined as part of the design evolution process.
- 11.15 In views along Drury Lane, the building is one storey lower than the 2019 consented scheme and will remain intentionally subordinate in height and appearance within the context of the surrounding roofscape. The extended height therefore sits comfortable alongside the other neighbouring taller buildings.
- 11.16 In views along Parker Street, the proposed building will make an appropriate contribution to the character of the street and will sit comfortably in the street scape with its complementary choice of colour and materials, the set-back uppermost storey and appropriate amount of glazing.
- 11.17 At the pre-application meeting, the urban design officer requested that an additional view point from Wild Street be reviewed. Accordingly, the proposed view from Wild Street has been prepared within the Design and Access Statement. The proposals from Wild Street are glimpsed however, due to the height of the surrounding buildings and the dominance of the buildings on Great Queen Street, the proposals are considered recessive. The inclusion of arched windows at the rear will be visible from certain angles and will enhance the roofscape

when viewed from Wild Street, as they will echo the decorative arch of 40 Great Queen Street.

Conclusion

- 11.18 The surrounding environment has been carefully considered in the development of the proposals, having regard for the relevant legislative framework.
- 11.19 The design of the proposal is consistent with the relevant national tests and local policy requirements. The design meets the statutory tests of Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 as it will preserve and enhance the character and appearance of the Seven Dials Conservation Area (Camden) and Covent Garden Conservation Area (Westminster).
- 11.20 The pre-application response also confirms the proposals are not considered to harm the character and appearance of the conservation area. As such the proposals are in line with national, regional policy and Local policy D2 regarding heritage assets.



12 Amenity

- 12.1 This section assesses the proposals against policy relating to the amenity of nearby existing residents in terms of air quality, daylight, sunlight and overlooking, and noise.
- 12.2 At a national level, NPPF paragraph 185 advises that planning decisions should ensure that development is located appropriately. Development proposals should consider the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the Site or the wider area to effects that could arise from development. In pursuance of this, development proposals should mitigate and reduce to a minimum any potential adverse effects upon amenity.
- 12.3 The NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution (paragraph 174).
- 12.4 Paragraph 185 states that decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of development and mitigate noise impacts. This paragraph contains recognition that development will 'often create some noise'.

Air Quality

- 12.5 At the regional level, London Plan Policy SI1 states development proposals must be at least air quality neutral and should not:
- a) lead to further deterioration of existing poor air quality;
 - b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;
 - c) create unacceptable risk of high levels of exposure to poor air quality.
- 12.6 Local Plan Policy CC4 requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution.

12.7 Camden Planning Guidance: Air Quality (January 2021) states that all developments are to protect future occupants from exposure to poor air quality, and all developments are to limit their impact on local air quality and be at least air quality neutral.

Assessment

12.8 The Air Quality Assessment, prepared by Air Quality Consultants, describes the potential air quality impacts associated with the proposed refurbishment and development of the site. An assessment of construction dust impacts is also provided.

Construction Phase

12.9 The air quality impacts during the construction phase of the proposed development and sensitive receptors are identified.

12.10 A range of best practice mitigation measures will be implemented to reduce dust emissions and the overall effect will be 'not significant'; appropriate measures have been set out in this report.

Operational Phase

12.11 The Air Quality Assessment has suggested that there is no requirement for a detailed assessment of road impacts on the existing receptors as it is stated that there will be no significant impact on local roadside air quality.

12.12 It is also concluded that the future users of the proposed development will experience acceptable air quality, and ultimately, the operational air quality effects without mitigation are judged to be 'not significant', therefore no additional mitigation has been proposed.

12.13 The report states that due to the development being 'car-free' and the proposal would use air source heat pumps for heating and hot water, it complies with policy that the proposal is at least air quality neutral.

Conclusion

12.14 Therefore, the proposed development is compliant with regional Policy SI 1 and local Policy A1, CC4, and CPG Air Quality in respect of air quality.

Daylight, Sunlight and Overshadowing

12.15 London Plan policy D3 sets out that development proposals should deliver appropriate outlook, privacy and amenity.

12.16 Local Plan policy A1 emphasises that the Council will seek to ensure that the amenity of communities, occupiers and neighbours is protected. In particular, the Council will consider sunlight, daylight and overshadowing.

12.17 The Amenity CPG expects applicants to consider the impact of development schemes on daylight and sunlight levels and that the 45 degree and 25 degree tests cited in the BRE guidance should be used to assess whether a sunlight and daylight report is required.

Assessment

12.18 The daylight and sunlight affecting the proposed development and surrounding properties (habitable rooms and windows that overlook the site) is considered within the Daylight and Sunlight report, prepared by Point 2, submitted with this application. The report's assessments uses the BRE guidelines, which provide two principal measures for assessing the impact on properties neighbouring a site, namely:

1. Vertical sky component (VSC) – the measure of direct skylight reaching a point from an overcast sky
2. No-sky line (NSL) – the measure of distribution of the distribution of daylight within a room.

12.19 Given that the 2019 consented scheme expired recently but is a comparable scheme, the report considers both the true existing baseline vs proposed development as well as the 2019 consented scheme vs the proposed development.

12.20 True existing vs proposed development – the report finds that the majority (93%) of the measured windows will meet the strict application of the BRE guidelines for VSC. It is noted

that the majority of the affected windows already record low existing VSC values and therefore any slight outlook alteration will likely trigger a disproportionate change in light. Notably, the proposed scheme records 13 instances of light improvements when assessed against the existing baseline. In terms of the NSL analysis, 86% of the measured rooms will meet the strict application of the BRE guidelines. The analysis shows that a number of the affected rooms are constrained by their outlook by virtue of the configuration of the adjoining buildings that challenge oblique availability. The results of the sunlight assessment, the APSH records full BRE compliance (100%) commensurate with the BRE guidelines.

12.21 2019 consented scheme vs proposed development – the report finds that the VSC assessment records full BRE compliance (100%) and notably, there are 79 instances of light betterments when assessed against the 2019 consented scheme. In terms of the NSL test, 98% will meet the strict application of the BRE guidelines. The analysis also demonstrates 22 instances of light betterments when assessed against the 2019 consented scheme. The results of the APSH test record full BRE compliance (100%)

12.22 The Daylight and Sunlight report further reviews the overshadowing (“Sun on Ground” assessment) of the proposed development on neighbouring residents. The analysis demonstrates that for true existing baseline against the proposed scheme, the results of the proposed Sun on Ground (SoG) assessment shows that 5 out of 6 amenity spaces wither meet the BRE’s target of 50% surface area receives at least 2 hours in sunlight on March 21st (the Spring Equinox) or record a commensurate light change from former value. In respect of the extended June 21st assessment (the Summer Solstice) that considers the summer months when outdoor spaces are more likely to be utilised and enjoyed, the results record full BRE compliance.

12.23 When comparing the 2019 consented scheme versus the proposed development the proposed SoG assessment records full BRE compliance on March 21st and the extended June 21st assessments. Notably 1 space records an improvement because of the proposal when compared to the 2019 consent.

Conclusion

12.24 In summary, the proposed development will relate well to the neighbouring residential properties and fall within the practical application of the BRE guidelines, and are in line with London Plan policy D3, Local Plan policy A1 as well as the Amenity CPG for daylight and sunlight.

Noise

12.25 London Plan Policy D14 states that development proposals should manage noise by:

- avoiding significant adverse noise impacts on health and life;
- mitigating and minimising the existing and potential adverse impacts of noise without placing unreasonable restrictions on existing noise-generating uses;
- improving and enhancing the acoustic environment and promoting appropriate soundscapes;
- promoting new technologies and improved practices to reduce noise at source.

12.26 Camden Local Plan Policy A4 seeks to ensure that noise and vibration from development is controlled and managed. Planning permission will only be granted for noise generating development where it can be operated without causing harm to amenity. Camden also seeks to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development through this policy.

12.27 The Amenity CPG prepared by Camden supports Local Plan Policy A4, setting out that the Council will assess the impact of noise and vibration through the consideration of acoustic reports submitted by applicants. The Council expects noise mitigation (where appropriate) to be incorporated into developments at the design stage and the Council will seek to secure these through planning condition or legal agreement.

Assessment


12.28 A new climate control system will be installed as part of the proposed development which will require the installation of nine external condenser units (and the removal of existing

plant equipment). The units will be arranged on the rear first floor roof and within an open topped plant enclosure at main roof level.

- 12.29 The Environmental Noise Assessment, prepared by Acoustics Plus Ltd, submitted as part of this application has determined the existing background sound levels in the vicinity of the site and surrounding noise sensitive premises.
- 12.30 The nearest sensitive facades are the rear upper levels of properties located on Great Queen Street and Parker Street, notably 39 and 40- Great Queen Street and 8-24 Parker Street.
- 12.31 According to the Environmental Noise Assessment, prepared by Acoustic Plus Ltd, the proposals will comply with the LBC's noise threshold requirements, as set out in Appendix 3 of the Local Plan referenced in Policy A4.
- 12.32 In order to comply with the LBC's requirements, it will be necessary to use acoustic attenuation kits. Furthermore, building edge diffraction is provided by screening the line of sight between the condenser units and the adjacent residential facades. This will occur due to the positioning of each plantroom and is mitigation provided by implementing considerate acoustic design.
- 12.33 It should also be noted that the proposed development will remove existing plant from the rear of the building and consolidating these to the roof. This is expected to improve the existing amenity of adjacent noise sensitive premises.

Conclusion

- 12.34 Given that the uses proposed at the site are in line with the existing use of the building and are in keeping with the character of the existing uses in the immediately surrounding area it is not considered that the proposed uses will cause harm to the existing amenity levels at the site. The hours of use of the flexible retail units will be conditioned as part of the planning permission.
- 12.35 In addition, Camden Local Plan Policy A4 acknowledges that deliveries associated with a development can lead to adverse noise impacts. The Transport Statement demonstrates that



the level of servicing and delivery activity associated with the development is anticipated to remain similar to the existing situation. Therefore, it is not considered that an adverse noise impact will be felt as a result of the deliveries associated with the proposed development.

12.36 Therefore, the proposed development will accord with planning policy at all levels in respect of noise and vibration.

13 Transport and Servicing

Transport

- 13.1 Chapter 9 of the NPPF sets out the Government's policies with regards to Transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and would contribute to wider sustainability and health objectives. The NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, in order to give people a real choice about how they travel. It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion.
- 13.2 Paragraph 110 of the NPPF states it should be ensured that:
- appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - safe and suitable access to the site can be achieved for all users;
 - the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 13.3 Paragraph 111 of the NPPF is clear that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 13.4 London Plan Policy T1 'Strategic approach to Transport' examines the integration of transport and development and states that development proposals should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. Furthermore, all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

- 13.5 Paragraph 10.1.1 of the London Plan makes it clear that development proposals should facilitate sustainable travel through their location and design and support walking, cycling and public transport. Paragraph 10.1.4 goes on to state that improving street environments to make walking and cycling safer and more attractive will help to rebalance the transport system towards walking, cycling and public transport.
- 13.6 Policy T4 of the London Plan states that development proposals should reflect and integrate with current and planned transport access, capacity and connectivity. Transport statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.
- 13.7 Paragraph 10.4.2 of the London Plan highlights that transport assessments should include an assessment of demand arising from personal travel as well as from potential servicing and deliveries, taking into account the impacts both on all modes of transport including walking and cycling and on streets as social spaces.
- 13.8 London Plan Policy T5, sets out the standards that apply to developments in respect of minimum cycle parking numbers. The relevant figures to this development are summarised at Table 3 which demonstrates the direction of travel for cycle parking.

Table 3: London Plan Cycle Parking Standards

Land Use	Long Stay Minimum Standards	Short-stay Minimum Standards
Office	1 space per 75 sqm (GEA)	First 5,000 sqm: 1 space per 500 sqm (GEA)

- 13.9 Paragraph 10.5.1 states that ‘Development should facilitate and encourage cycling and reduce car dependency and the health problems it creates.’ Paragraph 10.5.5 states that cycle parking and cycle parking areas should allow easy access and provide facilities for disabled cyclists.
- 13.10 Policy T6 sets out the Mayor’s position on car parking. Part B states that car-free development should be the starting point for all development proposals in places that are

well-connected by public transport.’ Appropriate disabled persons parking for Blue Badge holders should be provided.

13.11 Policy T7 of the London Plan ‘Deliveries, servicing and construction’ requires development plans and proposals to facilitate sustainable freight movement by rail waterways and road. They should seek to:

- i Reduce freight trips to, from and within these areas;
- ii Coordinate the provision of infrastructure and facilities to manage freight at an area-wide level; and
- iii Reduce road danger, noise and emissions from freight, should as through the use of safer vehicles, sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.

13.12 Policy T7 also states that development proposals should facilitate safe, clean and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments. Deliveries should be received outside of peak hours and in the evening. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing. During the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.

13.13 At a local level, Camden Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this Camden will seek to ensure developments improve the pedestrian environments by supporting improvements to the pedestrian environment. The delivery of improved walkways, wide pavements and safe and permeable developments is supported.

13.14 Local Plan Policy T2 seeks to limit the availability of parking and require all new developments in the borough to be car-free.

- 13.15 To assess the overall implications of developments LBC, under Policy T4, expects the submission of a Transport Assessment, Delivery and Servicing Management Plan and Construction Management Plan where the implications of proposals are significant.
- 13.16 Camden's Transport CPG (January 2021) provides information on the application of Camden's transport policies, including all types of detailed transport issues including assessing transport impact, travel plans, delivery and servicing plans and cycling facilities.

Assessment

- 13.17 The site is extremely well connected in terms of public transport with a PTAL rating of 6b (6b being the highest accessibility). The site is within 300m of Covent Garden underground station and serves the Piccadilly Line. Tottenham Court is 650m away on foot which provides services on the Elizabeth, Central and Northern Lines. Additionally, the site is served by 28 bus routes within the recommended TfL walk threshold of 640m, with the closest bus stop located at Kingsway, 280m north. National rail services are also available from Charing Cross, about 1km from the site.
- 13.18 Further, there is a range of cycle and walking routes available from local desire lines, as well as provision of London Cycle Hire docking stations conveniently located in proximity to the site on Parker Street and adjacent to the corner of Parker Street and Drury Lane within a very short walk of the building entrance.
- 13.19 The proposals will incorporate a total of 22 cycle parking spaces (21 standard spaces and 1 accessible space) in line with London Plan standards. The building currently has no formal provision for cycle spaces for the existing office space and therefore the provision of cycle spaces is considered to be highly beneficial for the whole building and not just the extension. The cycle parking is proposed to be accessed via a dedicated door on Drury Lane and will include end of trip facilities such as showers and lockers for staff.
- 13.20 In terms of externally located cycle parking spaces, the pre-application response has confirmed the acceptability of providing these via a financial contribution, for the installation of three externally located Sheffield stands (or equivalent) to provide an additional 6 short-term cycle parking spaces within the local area.

- 13.21 There are no car parking spaces proposed, as per existing.
- 13.22 A draft workplace Travel Plan has also been prepared to promote sustainable methods of commuting. It includes a series of measures and incentives which would be brought forward to actively sustain and promote sustainable travel behaviours by the occupiers of the building.
- 13.23 The accompanying Transport Statement prepared by TPHS assesses the potential traffic, transport and highway implications associated with the additional office floorspace proposed for the site. The trip generation assessment estimates that the extension will generate an increase of 62 person trips daily (two-way) The peak period increase would result in 10 two-way trips in the AM peak period and 5 two-way person trips in the PM peak period.
- 13.24 The Transport Statement finds that the proposals can be accommodated within the existing traffic and transport infrastructure in the area surrounding the site. The site by virtue of its position is well served by public transport and there will negligible increase in person trips following the redevelopment of the site.
- 13.25 Conclusion
- 13.26 The proposed development will promote sustainable transport through the increase in provision of cycle parking at the site by 22 spaces in line with the London Plan requirements as well as the Local Plan policy T1. The development is also car-free.
- 13.27 In summary, there would be no material impacts on the local travel networks, highways and other modes of travel, as a result of the proposed redevelopment and that the operational requirements of the proposals would be satisfactorily accommodated without any material impact. The proposed development is therefore in line with national, London Plan policies T1, T4, T5, T6, T7 and local plan policies T1, T2 and T4. The proposals therefore comply with national, regional, and local transport planning policy. The impact of the proposed development once operational is acceptable in transport terms.

Servicing

13.28 London Plan Policy T7 sets out that development proposals should facilitate safe, clean and efficient deliveries and servicing. The provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.

13.29 Local Plan Policy CC5 'Waste' seeks to make Camden a 'low waste' borough. In order to achieve this, the council requires developments to include facilities for the storage and collection of waste and recycling.

Assessment

13.30 In terms of the collection of general refuse and recycles, the additional minor increase in floorspace is not considered to generate a significant level of additional waste. Similarly, it is also the case that the provision for general deliveries and other service activity would not be significantly impacted upon as a result of the additional floorspace proposed.

13.31 The site currently as with many other similar buildings in the vicinity operates a service strategy by placing rubbish on street to be collected from the pavement, with no formal dedicated storage on site.

13.32 Servicing and deliveries will be as per the building arrangements for the building, collection from on-street. These arrangements will be modified as part of the proposed ground floor plans, as the rear area would be given over to an internal storage area. Bins will be moved by the collection operatives on the day of collection directly between the internal storage facility and the collection vehicle on-street by the service access door, as this will be undertaken by private contractors and / or Camden representatives under a private contract.

13.33 This represents a significant benefit to the existing arrangements as part of the scheme.

13.34 Conclusion

13.35 Therefore the proposals are fully compliant with both national and local planning pilucy in terms of servicing.

Construction Traffic Management

13.36 Local Plan Policy T4 seeks to minimise the impact of the movement of goods and materials by road. In order to achieve this LBC will:

- a) encourage the movement of goods and materials by canal, rail and bicycle where possible;
- b) protect existing facilities for waterborne and rail freight traffic and;
- c) promote the provision and use of freight consolidation facilities.

13.37 Moreover, Paragraphs 10.34 and 10.35 set out the roads that heavy goods are expected to be transported along and suggests that the impact of goods vehicles can be reduced where a loading and unloading bay is included within a development, particularly where the bay can be enclosed. Developments should therefore incorporate space within the site for goods vehicles.

Assessment

13.38 The supporting draft Construction Management Plan (CMP), prepared by MAR, submitted with this application follows the LBC's pro forma.

13.39 The draft CMP confirms that the site is not to be accessed by vehicles and that all deliveries and/or waste removals are to occur 'off the road'.

13.40 The hours of construction are to be confirmed following the tender process, however it is very likely that they will be in line with Camden 'workplans', therefore, the proposed working hours during the construction period are likely to be:

- 8am – 6pm: Mondays-Fridays; and
- 8am – 1pm: Saturdays.

13.41 Conclusion

13.42 In this instance, the proposed development will be conducted in a manner that accords with local planning policy requirements.

14 Planning Obligations and Community Infrastructure Levy

- 14.1 Under Section 106 of the Town and Country Planning Act 1990, Local Planning Authorities may enter into planning obligations with any person with an interest in land for the purpose of restricting or regulating the development or use of the land.
- 14.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, the law states that a planning obligation may only constitute a reason to grant planning permission where it meets all of the following tests. The legal position is reinforced by paragraph 204 of the NPPF, which says that a planning obligation should only be sought where it is:
- a) Necessary to make the proposed development acceptable in planning terms;
 - b) Directly related to the proposed development; and
 - c) Fairly and reasonably related in scale and kind to the development.
- 14.3 Paragraph 54 of the NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 14.4 Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise, and reasonable in all other respects (Paragraph 55 NPPF).
- 14.5 Policy DF1 of the London Plan 'Delivering of the Plan and Planning Obligations' states that when setting planning obligations in Local Development Plan Documents, and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should first apply priority to affordable housing and necessary public transport improvements, and following this health and infrastructure, affordable workspace, culture and leisure facilities, in delivering good growth.
- 14.6 The use of planning obligations is specifically required through Local Plan Policy DM1 'Delivering and Monitoring' although a range of individual development policies may be used to justify an obligation.

14.7 Local Plan Policy DM1 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to: support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and to mitigate the impact of development.

14.8 Based on the formal pre-application advice received, dated 09 February 2023, the anticipated planning obligations for this development are:

- Financial contribution in lieu of residential provision;
- Car free development;
- Construction management plan (plus monitoring fee);
- Construction Impact Bond
- Workplace Travel Plan (plus monitoring fee);
- Highways Contribution; and
- Pedestrian, Cycling, Environmental, and Public Realm improvements.

Community Infrastructure Levy (CIL)

14.9 Since 2012, all developments in London which result in the addition of over 100sqm GIA floorspace (with some exceptions including affordable housing) have been eligible to pay Mayoral CIL.

14.10 In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and supersedes MCIL1 and the associated Crossrail Funding SPG. All development in the Central London zone is charged at £185 / sqm.

14.11 Alongside the Mayoral CIL, the Camden CIL came into effect on 1 October 2020. The CIL tariff for sites located within Zone A (within which the location of the Site) are charged at the £110 / sqm.

14.12 A completed CIL form has been submitted with this application.

15 Summary and Conclusions

- 15.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 15.2 This Planning Statement has assessed the proposals against the development plan and other relevant planning policy and guidance at national, regional and local policy level.
- 15.3 The proposed development has been subject to thorough pre-application discussions with local residents, amenity bodies, businesses and Camden officers. The applicant has sought at all times to consider and incorporate responses received.
- 15.4 Having purchased the building for use as their London headquarters, MAR are keen to ensure the proposals deliver a scheme that reflects its own objectives, which seek to develop high quality buildings that meet the needs of today's occupiers; adopt best practice in the design, specification and construction of buildings and to ensure buildings are delivered as sustainably and possible, and minimising the impact of their operations on the environment.
- 15.5 The application therefore presents an exciting opportunity whereby the applicant will be a long term user and steward of the building and ensuring it contributes positively on the local area, improving the public realm and reactivating a key frontage in central London that borders the City of Westminster.
- 15.6 The proposals have been developed to reflect and respect the surrounding conservation area and the typical scale and massing of the surrounding buildings and will deliver the following public benefits:
- A contribution to the regeneration and upgrade to the local area;
 - A sustainable reuse and repositioning of a building which current does not make a positive contribution to the conservation area, nor meets the requirements for modern office user requirements;
 - Delivering an uplift of 270 sqm (GIA) of high quality flexible and adaptable business floorspace;
 - Financial contribution to Camden's affordable housing fund via payment in lieu;

- Delivering sustainable development through improvements in energy efficiency;
- High quality design, contributing to the wider townscape and conservation area setting and local streetscene that borders onto the City of Westminster;
- Contributing to the function and character of the area through the provision of an improved, active ground floor retail unit.

15.7 The proposal demonstrates that it satisfies and exceeds planning policies at national, regional and local levels to deliver a sustainable office led building and should therefore be approved.