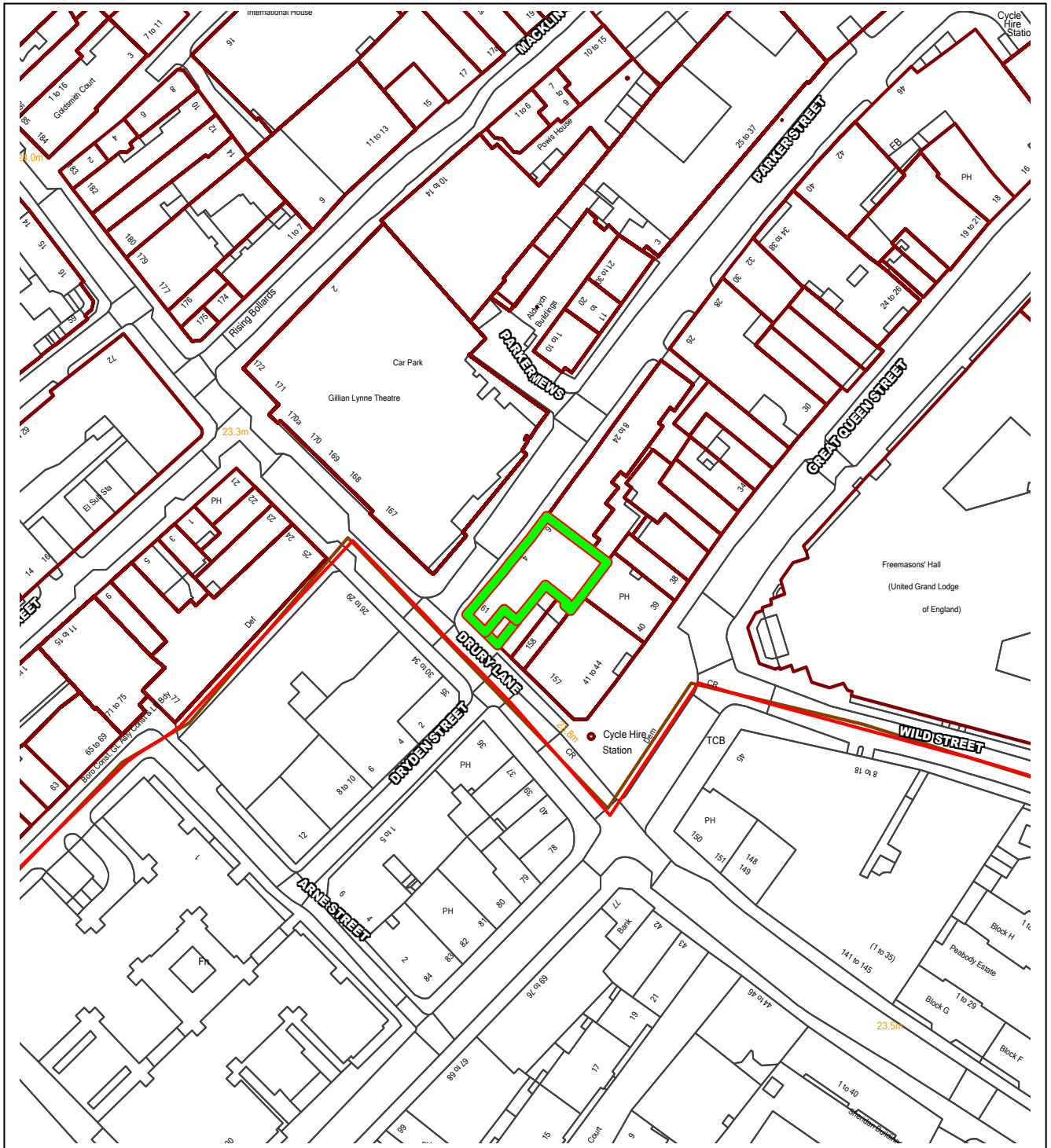
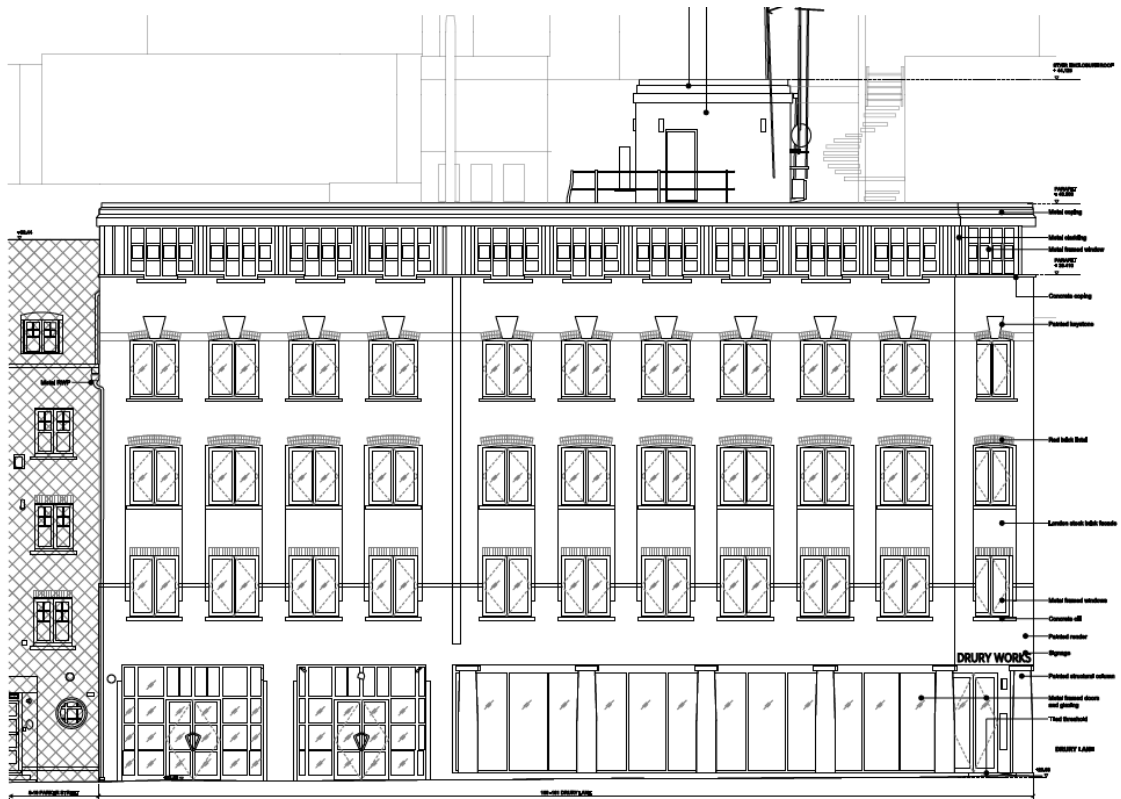


Location plan-160/161 Drury Lane 2023/2245/P



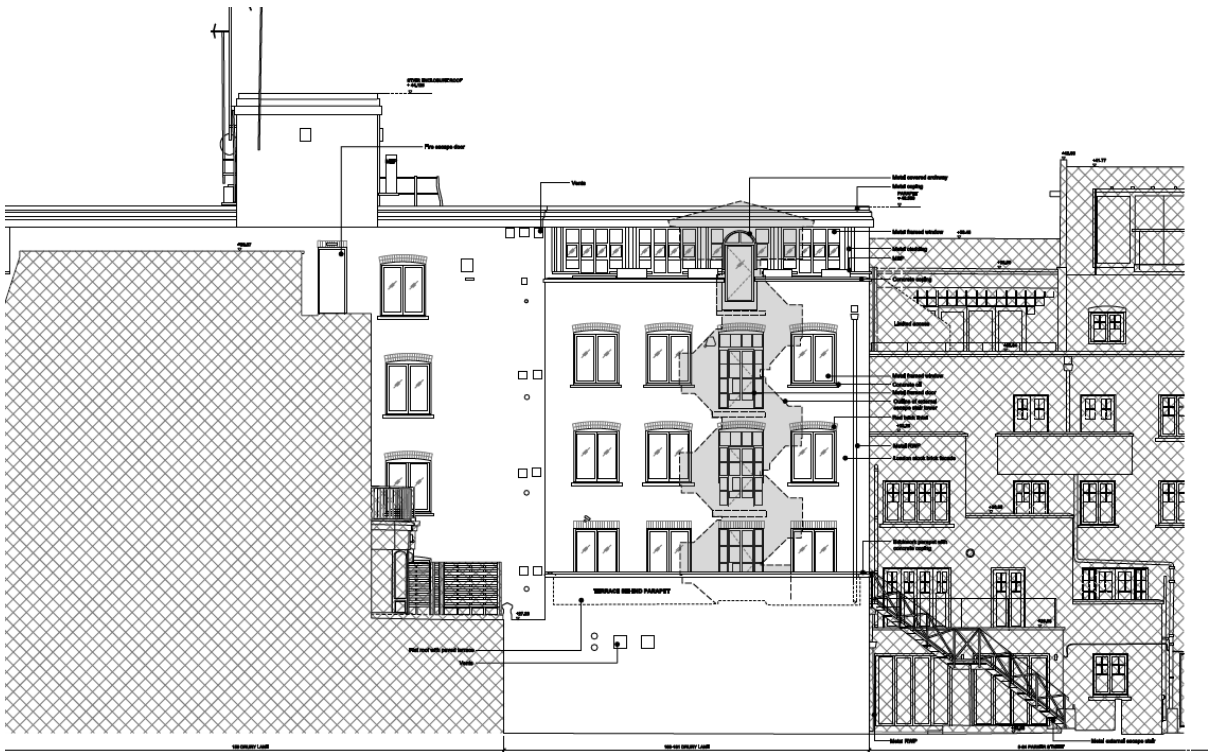
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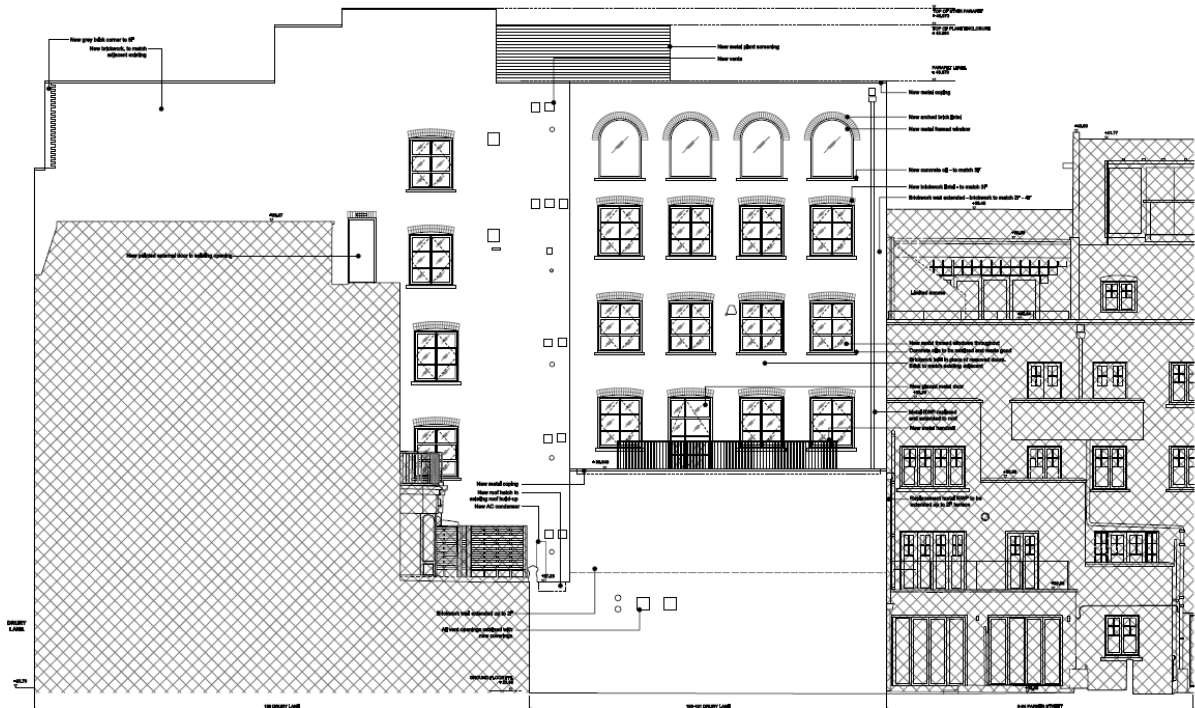
Existing front elevation



Proposed front elevation



Existing rear elevation



Proposed rear elevation facing

Delegated Report		Analysis sheet		Expiry Date:		31/08/2023			
(Members Briefing)		N/A / attached		Consultation Expiry Date:		07/09/2023			
Officer				Application Number(s)					
Enya Fogarty				2023/2245/P					
Application Address				Drawing Numbers					
160-161 Drury Lane & 4-6 Parker Street London WC2B 5PN				See draft decision					
PO 3/4		Area Team Signature		C&UD		Authorised Officer Signature			
Proposal(s)									
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.									
Recommendation:		Grant conditional planning permission subject to a Section 106 Legal Agreement							
Application Type:		Full Planning Permission							
Conditions or Reasons for Refusal:		Refer to Draft Decision Notice							
Informatives:									
Consultations									
Summary of consultation		Three site notices were displayed near to the site on the 30/06/2023 (consultation end date 24/07/2023). The development was also advertised in the local press on the 29/06/2023 (consultation end date 23/07/2023).							
Adjoining Occupiers:				No. of responses		18	No. of objections		15
Summary of consultation responses from occupiers:		<p>In total, 15 letters of objection and 3 support letters were received. This included letters by Friends of Parker Street written on behalf of the local residents. Individual letters were also received from adjoining occupiers at: Flat 2, 3, 4, 5 158 Drury Lane, Flat 1, Flat 3 and flat 4, Market House, 12-16 Parker, Flat 6 158 Drury Lane, 8 Parker Street, Flat 3 38 and 39 Great Queen Street</p> <p>The comments received in these letters are summarised below:</p> <p><u>Amenity:</u></p> <ol style="list-style-type: none"> Proposed terrace would cause loss of privacy and noise disruption to 158, 159 Drury Lane, 8 Parker Street 12-16 Parker Street, 38 & 39 Great Queen Street. First floor rear extension overbearing visual impact upon residents in 158, 159 Drury Lane, 8 Parker Street 12-16 Parker Street, 38 & 39 Great Queen Street and loss of light to communal courtyard. 							

3. Loss of light from extensions proposed would cause an adverse effect on amenity, particularly in relation to (FLAT 2, 3, 4, 6) 158, 159 Drury Lane, 8 Parker Street, 12-16 Parker Street, (flat 3)38 & 39 Great Queen Street
4. Inappropriate location of bin and cycle store and resulting noise disruption from movement
5. Loss of outlook and added sense of enclosure
6. Ventilation of the bin area should be 100% passive
7. Do not want early morning or late-night deliveries or late night opening of unit due to potential anti-social noise.
8. Local residents will not get any benefit from the proposed scheme

Officer's response:

Please see section 06 of the main report for a full discussion in relation to potential impacts to amenity. For specific paragraphs, please see the following:

(1) p.6.23-6.26 (privacy) p6.57-6.58 (Noise)

(2) p.6.22

(3) p. 6.27-6.56

(4) p.6.59

(5) p.6.3-6.23

(6) p.6.59

(7) p.7.6

(8) The council considers that the proposed scheme would bring benefits to the immediate area and local residents in terms of employment.

Character:

1. The proposed roof extension is dominant and incongruous
2. Roof extension would not fit in with the wider character and streetscape due to its 'block' design
3. The proposed roof extension would disrupt the roofline and would result in additional bulk
4. 1st floor rear extension would dominate the courtyard

Officer's response:

Please see section 5 of the main report for a full discussion in relation to design and conservation

Use

1. Concerns that a restaurant may be accommodated within the building without planning permission. As a result, the same conditions which were attached during the 2019 application should be reattached to ensure there is no impact on neighbouring amenities.
2. Hours of the site would be conditioned and should not operate past 8pm
3. Both the Camden Local Plan and the Camden Employment Land Review were published before the Covid-19 pandemic and therefore do not account for the significant changes to office demand.
4. Retail use would result in antisocial behaviour
5. No cooking should be allowed on site
6. Could result in an additional late-night venue

Officer's response:

Please see section 3 of the main report for a full discussion in relation to Use and employment.

(1) No resultant is proposed within the building. Although similar this application is accessed independently to the 2019 application so exact same condition may not be reattached if not considered necessary.

(2) P.6.59

(3) Regardless of Covid 19, office use is in demand in Camden and in this central commercial area. Therefore, the use is considered in accordance with local and national policies.

(4) Retail use is not proposed, the building would be in use for office purposes.

(5) Condition will be attached to ensure no primary cooking occurs on site.

(6) The building lawful use and proposed use is Class E, therefore it would not be a late night venue.

Construction impacts

1. Construction management impact of noise, and dust will be considerable. As a result, hours must be restricted
2. Dust will be a very real issue, and we urge the Council to require any construction management plan to incorporate additional cleaning for adjoining residents (including windows).
3. Deliveries will need to be restricted to the hours 0900-1700 and vehicles are to be appropriately managed

Officer's response:

Please see paras.7.7-7.8 for a discussion on the construction related impacts of the scheme

Other comments-2019 planning application- 2019/2095/P

1. Erroneous information was missing from the 2019 planning application 2019/2095/P
2. No effective consultation and therefore residents couldn't object to planning application
3. 2019/2095/P
4. Errors and missing information from planning application 2019/2095/P
5. Delegated report for planning application 2019/2095/P stated no areas to the rear should be used for amenities areas and this should re apply to this application.

Officer's response: As planning permission 2019/2095/P was granted I do not consider it necessary to comment on this application. Local residents can view the delegated report and decision notice which details the reasons why permission was granted. As stated above, although the applications are similar each application is assessed on its own merit.

Thames Water

A consultation letter was received from Thames water. Due to the location of the development near a strategic sewer, Thames have requested conditions to be attached to the planning application.

Seven dials trust

A letter of objection was received on behalf of the Seven Dials Trust following a request for their comment. The concerns they raise within the letter are summarised as follows:

1. The proposals will result in a building which is one storey higher, and more incongruous and dominant in the townscape.
2. The proposal would fail to preserve the setting of the Seven Dials CA. It would cause harm to this designated heritage asset.

Officer Response:

(1-2) Please see section 5 of the main report for a full discussion on design and conservation

<p>Westminster LPA</p>	<p>As apart of the application Westminster were consulted but to date have not received a response.</p>
<p>Seven Dials / Covent Garden Conservation Area Advisory Committee (CAAC)</p>	<p>A letter of objection was received on behalf of the CAAC following a request for their comment. The concerns they raise within the letter are summarised as follows:</p> <ol style="list-style-type: none"> 1. Object to the proposed height of the roof extension. The intention to add an extra storey (after first demolishing & replacing the 4th floor) will make this tight little corner overwhelming. The street is narrow and at that junction more so. 2. The proposed extra height does not keep the line of its surrounds and will have a seriously negative impact on the street scape 3. Tuscan columns should be retained as they are original features. The proposed ground floor design is weak. <p>Officer Response:</p> <p><i>(1-3) Please see section 5 of the main report for a full discussion on design and conservation</i></p>
<p>Covent Garden Community Association (CGCA)</p>	<p>A letter of objection was received on behalf of the CGCA following a request for their comment. The concerns they raise within the letter are summarised as follows:</p> <ol style="list-style-type: none"> 1. The current building is already higher than its immediate neighbours on both Drury Lane and Parker Street. Adding further height would produce a more uncomfortable relationship with those adjoining buildings 2. Additional floor would appear incongruous and dominant 3. The loss of setback on the 4th floor presents a less sympathetic addition to the streetscape. 4. The colonnade on the existing ground floor should be retained as they are a desirable feature 5. The proposed treatment of the ground floor frontage overly dominant and out of keeping with the building and streetscape. 6. Rooftop plant would have a negative impact on the residential units behind the building. 7. Loss of light to neighbouring properties and rear communal area 8. Loss of outlook, privacy and lightspill 9. Loss of privacy from terrace 10. Roof terrace hours should be conditioned if approved to Monday to Friday 9am to 6pm 11. Use should be conditioned to ensure no intensive use classes are implemented <p><u>Officer's response:</u></p> <p><i>(1-5) Please see section 5 of the main report for a full discussion on design and conservation</i></p> <p><i>(6-9) Please see amenity section of report</i></p> <p><i>(10) Please see paras.6.57-6.58</i></p> <p><i>(11) Please see employment and use section of the report</i></p>

Site Description

The application site relates to a five storey (plus partial basement) commercial building that occupies a plot on the corner of Parker Street and the southern end of Drury Lane, close to the borough boundary. The existing building is primarily in office use, though it does feature two retail units at ground level, though only one is occupied (Whipped London dessert shop). It has a roughly L-shaped footprint with an area of approximately 320sqm and sits opposite the Gillian Lynne Theatre.

The application site is located within the Seven Dials Conservation Area, though it is regarded as making a neutral contribution to the Conservation Area within the local conservation area statement. The site does not include any listed buildings and does not directly adjoin any listed buildings, though a number of listed buildings exist along the Great Queen's Street to the South. The centre line of Drury Lane represents the boundary to both the conservation area as well as the Borough, with Westminster and the adjoining Covent Garden conservation area on the opposing side of the street. As well as being within the 'Central London Activities Zone', Drury Lane is also designated as a secondary retail frontage.

The building was constructed in the mid-80's as part of the redevelopment of 4-24 Parker Street & 160-161 Drury Lane. The building's architecture is of its time, being dressed in buff brick with contemporary references to 19th century warehouse and wharf typologies. The local area contains a mix of uses, as is characteristic for Seven Dials. Along Drury Lane, buildings tend to host commercial units at ground floor level with residential flats at upper levels. Towards the northern end of the street, heights range from 3-4 storeys (plus mansards) and are typically a collection of Victorian townhouses of varying form, with the notable exception of the New London Theatre, which is a significantly taller and larger scale building. Further south towards Great Queen Street, heights increase as the buildings tend to have a grander character with taller floor to ceiling heights. 157 Drury Lane (/41-44 Great Queen Street), which is a prominent Portland stone clad building that forms the corner between Drury Lane and Great Queen street, has 6 storeys plus mansard roof extension. Parker Street also features buildings of mainly 4-5 storeys (plus mansards), though it is more domestic in character than Drury Lane.

The site has a Public Transport Accessibility Level (PTAL) rating of 6b (Excellent/ highest level). It is located within a short walking distance (5-10mins) from London Underground stations at Holborn, Covent Garden and Tottenham Court Road and stops serviced by multiple bus services can be found within a 5minute walk of the site.

Relevant History

The site

2019/2095/P - : Planning permission was granted on the 16/10/2019 for '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)'

P14/35/E/30685: Planning permission was granted on the 07/08/1980 for the '*Redevelopment by the erection of a part 4/5-storey development on Parker Street and a 4-storey development at 160 Drury Lane to provide 1,150 sq. metres residential (20 flats), 525 sq. metres office, 700 sq. metres retail, and 75 sq. metres storage accommodation.*'

P14/35/E/36129: Planning permission was granted at 4-24 Parker Street & 160-161 Drury Lane, WC2 on the 18/02/1985 for the '*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*'

PSX0004507: Planning permission was granted at 160-161 Drury Lane on the 26/06/2000 for the '*Relocation of existing shopfront entrance doors*'

2007/5484/P: Planning permission was refused at 161 Drury Lane on the 20/12/2007 for the '*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*'

2008/1297/P: Planning permission was granted at 160-161 Drury Lane on the 21/05/2008 for the '*Alterations to the shopfront, including the relocation of entrance door to corner of Drury Lane and Parker Street*'

Drury Lane East side (Camden)

158-159 Drury Lane, WC2. **8700087**: Conditional permission was granted on the 23/04/1987 for the '*Works of refurbishment and change of use at 158 & 159 Drury Lane to provide 3 self-contained residential units on the first second and third floors cafe with ancillary storage on ground and basement of 158 and shop and storage at 159 ground and basement and erection of rear extension*'

158-159 Drury Lane, WC2. **8703598**: Conditional permission was granted on the 11/02/1988 for the '*The erection of a roof extension and rear extension together with works of conversion to create three two- bedroom and two one-bedroom units across the first, second, third and new fourth floors; restaurant with ancillary storage on ground floor and basement of no.158 and shop and storage on ground floor and basement of no.159*'

Drury Lane West side (Westminster)

30-35 Drury Lane, 2 Dryden Street and 4-10 Dryden Street (Opposite Site) **18/07715/FULL**: Conditional planning permission was Granted on the 13/02/2019 for the following works: '*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*'.

Relevant policies

National Planning Policy Framework 2023

The London Plan 2016 and the Draft New London Plan 2018

Camden Local Plan (2017)

G1 Delivery and location of growth
H1 Maximising housing supply
H4 Maximising the supply of affordable housing
C5 Safety and security
C6 Access for all
E1 Economic development
E2 Employment premises and sites
E3 Tourism
A1 Managing the impact of development
A2 Open space
A3 Biodiversity
A4 Noise and vibration
A5 Basements
D1 Design
D2 Heritage
D3 Shopfronts
CC1 Climate change mitigation
CC2 Adapting to climate change
CC3 Water and flooding
CC4 Air quality
CC5 Waste
TC1 Quantity and location of retail development
TC2 Camden's centres and other shopping areas
TC4 Town centres uses
T1 Prioritising walking, cycling and public transport
T2 Parking and car-free development
T3 Transport infrastructure
T4 Sustainable movement of goods and materials
DM1 Delivery and monitoring

Supplementary Planning Policies

Seven Dials Conservation Area Statement – 1998

Camden Planning Guidance

CPG Access for all (March 2021)

CPG Air quality (March 2021)

CPG Amenity (March 2021)

CPG Design (March 2021)

CPG Developer contributions (March 2019)

CPG Employment sites and business premises (March 2018)

CPG Energy efficiency and adaptation (March 2021)

CPG Town centres (March 2018)

CPG Transport (March 2021)

Assessment

1. The proposal

- 1.1. Planning permission is sought to extend the building upwards by two storeys above its existing height, with the top storey roof extension. This would involve the demolition of the existing roof extension and extruding the building upwards by two floors. In addition, at roof level there would be plant and to the rear a first floor rear extension with a rear terrace atop of the extension
- 1.2. These extensions would be realised as part of a comprehensive refurbishment of the whole building. Accordingly, the property would effectively be stripped back to its frame and then fully retrofitted to a modern standard with a re-clad exterior, redesigned elevational treatment as well as the re-provision of the main office entrance. The building would continue to be in use as a E1 office use.

2. Assessment

- 2.1. The principal considerations material to the determination of this application are as follows:

4	The principle of development / land use;
4	Mixed use development / affordable housing;
5	Design and conservation
6	Neighbouring Amenity
7	Transport considerations
8	Waste and recycling;
9	Sustainability and Air quality
10	Section 106 legal agreement and Community Infrastructure Levy (CIL).

3. The principle of development / land use;

Office uplift (Class E)

- 3.1. Policy E1 states that the Council will encourage direct new office development to the growth areas, Central London, and the town centres in order to meet this forecast demand. Policy E2 (Employment premises and sites) states that the Council will encourage the provision of employment premises and sites in the borough. It also states that consideration will be given for higher intensity redevelopment of premises suitable for continued business.
- 3.2. The proposed development would result in a total uplift of 270sqm (GIA) to the existing building, resulting in the existing quantum of office space increasing to 1,491sqm. The works to extend and refurbish would result in the creation of high spec offices which extends the service life of the existing building and continue to complement the mix of uses within the local vicinity. The site is within a highly accessible location and is considered a sustainable location for increased office development in line with the Local Plan. Due to the narrow plot width, relatively small floor plate and positioning of central core, the building could be split between numerous tenants (as is currently the case) or retained for a single business, meaning that it could still flexibly accommodate a range of sizes of enterprises in the future. This means there is the potential to

allow the existing occupiers to return to the building after the redevelopment, which is welcomed. As such, planning and economic development officers in line with the adopted economic growth policies (E1 and E2) welcome the increase of employment floorspace within the site in principle.

- 3.3. Policy E2 (f) also sets out that as well as expecting floorspace suitable for small-medium enterprises (SMEs), securing managed affordable workspace should be explored. As set out above, the new office would feature a floorplate and layout that would allow for subdivision of floors to host a number of individual smaller tenants, however, the development would not provide any affordable workspace. Though not explicitly set out in the policy wording, the supporting text as well as the Employment Sites CPG reference state that affordable workspace will be typically sought for larger scale scheme with uplifts of +1000sqm (para.38). Given the limited uplift proposed, as well as the fact that the scheme would make a fully policy compliant contribution towards the provision of housing/affordable housing (see following section), this is considered acceptable in this instance.
- 3.4. Though the application is not of major scale, a legal obligation is sought to ensure that local residents benefit from the proposed scheme in line with the CPG Employment sites and business premises (2018). This would relate to both the construction phase and end phase of development. For construction, this would include a commitment to working to CITB benchmarks for local employment when recruiting for construction-related jobs, for all construction vacancies and work placement opportunities to be advertised exclusively with the King's Cross Construction Skills Centre before marketing more widely and for a Local Procurement Code to be agreed if the value of the scheme exceeds £1million. In addition, this would include a commitment to facilitate promotion of the Camden STEAM Commission objectives amongst end use occupiers. These obligations would be secured through a section 106 agreement.
- 3.5. Subject to the suggested terms of the legal agreement, the provision of the additional commercial floor space is considered to be acceptable in principle.

4. Mixed use development / affordable housing

- 4.1. Housing is regarded as the priority land use of the Local Plan and Policy H2 promotes the inclusion of self-contained homes as part of a mix of uses. The policy notes that, in the Central London Area, where development involves additional floorspace of more than 200sqm (GIA), the Council will require 50% of all additional floorspace to be self-contained housing, subject to certain considerations (criteria a to e). The policy goes on to note that, 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 floorspace or more is proposed. In considering whether housing should be provided on site, the Council will take into account criteria (a) to (e) and also criteria (f) to (j).
- 4.2. As the site is within Central London and the extensions would involve an uplift of more than 200sqm the Council's mixed-use policy (H2) would be triggered. As a result, there is a general expectation that 50% of the uplift would be provided as onsite residential space unless this is shown to be unfeasible. This would equate to an expectation for 270sqm of residential to be provided, which would be considered to have capacity to deliver approximately two/three homes.
- 4.3. Policy H4 seeks to maximise the supply of affordable housing in the borough and expects a contribution towards affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. The policy notes that, for developments with capacity for 10 or more additional dwellings (+1000sqm), the affordable housing should be provided on site.
- 4.4. The potential for the building to accommodate residential units at upper floors has been explored by the applicant, however, a number of factors are considered to constrain the potential for the provision of onsite housing. Most significant of these is the fact that 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.
- 4.5. The spatial requirements of such provision would have significant impact on the usable floor space and number of people working in this building. To test the potential for provision with a shared core arrangement, two design options were prepared and plans were drawn up to show how this might be accommodated. Option 1 would provide ground floor apartments although offering the best use of the available GIA, would be single aspect (in part), would not have access to amenity space and would cause security concerns. In addition, the townscape impact of the ground floor option would be significant to Drury Lane.

- 4.6. Option 2 would provide residential units on the 3rd floor only 50% of the GIA available would be meaningful residential use (accommodation, not core). This would be an inappropriate way to allocate space for housing and would have a detrimental affect on the office use within the building. The office use is the main use of the site and as such, it is important that this workspace is high quality. Smaller floor plates would become significantly less attractive to tenants and impact the viability of the scheme significantly.
- 4.7. 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. In line with policy H2, where such provision cannot be made a payment in lieu may be accepted.
- 4.8. In order to address this shortfall in housing provision, a financial contribution would therefore be secured to address this policy requirement based upon the area schedules for the development, policies H2/H4 and the Interim Housing CPG.
- 4.9. Subject to the legal agreement to secure these monies, the development would be considered to accord with policies H2 and H4 of the Local Plan.

5. Design and conservation

- 5.1. The application site is located within the Seven Dials Conservation Area, wherein the Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in accordance with Section 72 of The Planning (Listed Buildings and Conservation Areas Act) 1990 (as amended).
- 5.2. The nearest listed buildings are situated along the northern side of Great Queen Street to the North East of the site. This includes nos.38, 37- 36 and 30-31 that are grade II as well as 33-35 and 27-29 which are grade II* listed. In addition, on the Southern side of Great Queen Street sits the GII* listed Freemasons Hall. The Council has a statutory duty to have special regard to the desirability of preserving a listed building(s) or its setting or any features of special architectural or historic interest which it possesses, in accordance with Section 66 of The Planning (Listed Buildings and Conservation Areas Act) 1990 (as amended).
- 5.3. Policy D1 of the Local Plan seeks to secure high quality design in development and Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains and historic parks and gardens.
- 5.4. The host building was constructed in the mid-80's as part of the redevelopment of 4-24 Parker Street & 160-161 Drury Lane. The building's architecture is of its time, being dressed in buff brick with contemporary references to 19th century warehouse and wharf typologies. The development was formed of two distinct elements, the taller commercial building on the corner with Drury Lane (application site) and the lower residential element further along Parker Street which features 4-5 storeys (plus mansards) but it is more domestic in character. The CA statement considered the existing building to make a neutral contribution to the character of the area.
- 5.5. The proposed development has been negotiated within a pre-application process with input from officers from the Council's Conservation and Urban Design teams.
- 5.6. Given its prominent corner siting, the proposed additional storeys to the host building are not considered to overwhelm the streetscape or townscape hierarchy. The building sits between taller corner buildings of 157 Drury Lane to the South and the theatre to the North and attempts to bridge this divide whilst also respecting the changing context between Drury Lane (taller building, more commercial character) and Parker Street (more domestic in character and scale).
- 5.7. A seven storey building has already been very recently granted permission on the same site and the principle of that height has been established, although the acceptability of the height would always be subject to massing, form and materials. However, the massing, form and materials of the scheme as currently proposed are not considered to harm the character and appearance of the conservation area.

- 5.8. The proposed scheme retains the existing brick façade and extends it up by one additional floor. The existing render band is removed and a new base is introduced with extends to the underside of the first floor windows. At ground floor level the windows would be punched into the façade with deep reveals and new faïence panels creating a characterful street level presence. The faïence panels extend up the corner of the building adding a simple accent to the corner. New Crittall style metal windows are provided throughout creating a strong warehouse aesthetic across the whole façade which is welcomed.
- 5.9. At roof level the new fifth floor would be tiled and follows the profile of the building below. The windows on the corner have been unified vertically across two floors creating a subtle nod to the local warehouse characteristics, highlighting the importance of the corner in the surrounding context.
- 5.10. At street level the façade has adding interest at street level and improved hierarchy of entrances. It is unfortunate that the pillars to the ground floor are being over clad as they add a robust and distinctive character. However, in this context, the detailed deisgn of the ground floor façade along with remainder of building creates a heavy, robust character that typifies a successful warehouse façade.



- 5.11. The proposed materials are considered to enhance the existing building and create an interesting and sympathetic addition to Drury Lane, Parker Street and the surrounding conservation area. Finally, the proposed rear extension would remove the existing staircase which is visually obtrusive. The rear extension would not be visible from anywhere other than the private rear views from surrounding properties. There are also a number of first and second floor rear extensions to properties within the block, the extension is not considered to harm the character of the host building or local area.
- 5.12. This architectural treatment of the building is seen as a well-considered response to the existing site context and character of the local area. Whilst clearly expressing itself in a contemporary idiom, the design is reflective of the established character of the local area and would allow for the existing building to offer a much stronger and positive presence in the streetscene. The design has appropriately considered and been informed by local character and has the potential to enhance the character of Drury Lane. However, given the refined but simplified elevational treatment the overall success of this scheme will inevitably depend upon the quality of the final detailing. Notwithstanding, given the importance of these elements it is still considered necessary for a number of details to be reserved by condition. It is also considered necessary to ensure that the project architects are retained, or that any reappointment is first approved by the Council in order to ensure the highest standard of design is maintained.
- 5.13. With this in mind, recommendations to approve the scheme would be subject to a legal obligation relating to the project architects as well as several design conditions requiring full details of the following:
- Full window and door details;
 - Brick panel for each type showing exact brick choice, mortar and bond;
 - Shop front / glazing details to include windows, doors and fascia area
 - Materials sample for roof extension
 - Detailed drawings for roof extension and parapet junction;

5.14. Subject to securing full details of all of the above, the Council may ensure that the positive design intentions set out within the submitted D&A statement are realised on site as the scheme is worked up to the next stage of technical construction level detailing.

Archaeology

5.15. Whilst it is noted that the application site is within an Archaeological Priority Area, the proposed development would not include any excavation or the reprovision of any structural piling or foundations. As the existing ground floor slab will not be disturbed by the development, there is no risk to any remain archaeology that might be present below the site and therefore no potential risk to this heritage asset.

6. Neighbouring Amenity

6.1. Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The policy notes that the factors to consider include: visual privacy and outlook; sunlight, daylight and overshadowing; artificial lighting levels; transport impacts; impacts of the construction phase; noise and vibration levels; odour, fumes and dust.

6.2. The application site sits in proximity to residential units in a number of properties. Following a site visit and a number of Valuation Agency (VOA) searches, the site plan below has been annotated to indicate the location of nearby residential accommodation in the figure below.



Figure 02: Site plan indicating nearby residential properties
(Orange= application site Aqua = residential; brown= non residential)

Outlook

6.3. Those elements of the scheme with the potential to cause harm to existing outlook of adjoining occupiers would be the proposed upwards extension at fourth and fifth level and rear infill extension at 1st floor level

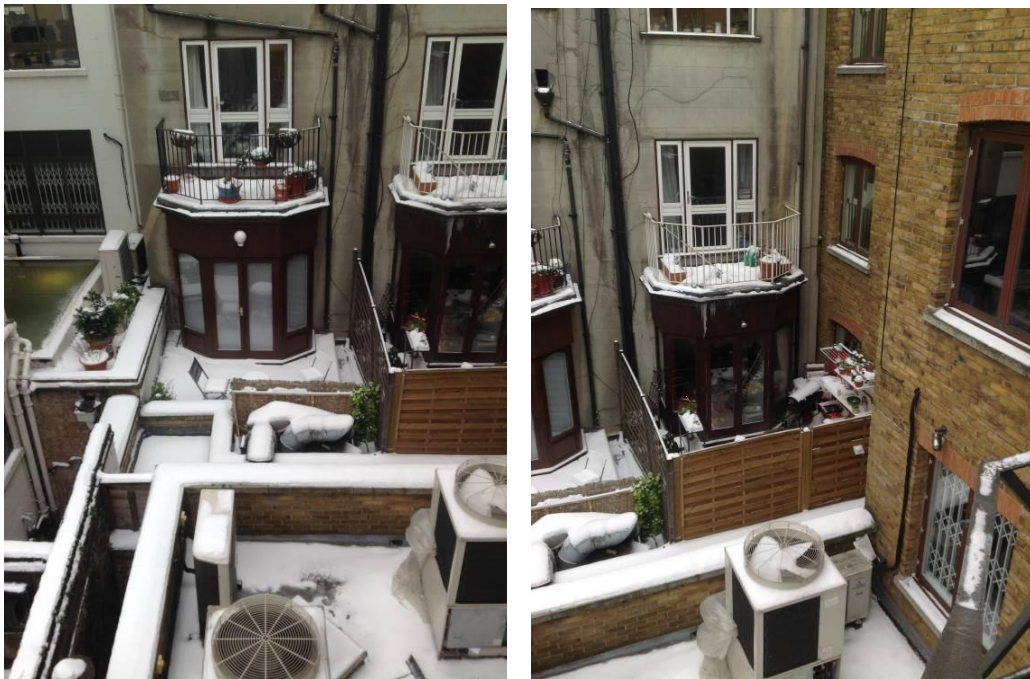
6.4. As illustrated in the figures above, the host building directly opposes commercial buildings to the South (157 Drury Lane), the North (Gillian Lynne Theatre) and West (30-35 Drury Lane in Westminster). While the extensions would project in front of facing windows to these properties, it is noted that policy A1 does not include provisions for the protection of outlook from non-residential uses on the basis that these rooms are used for a short period only and thus would not relate to 'living conditions'. Nevertheless, it is noted that the upper floor extensions would have an adequate separation distance from those buildings listed above respectively and so the increased roof volume is not considered to result in any overbearing relationship to these properties, given its form and siting.

6.5. The site is also adjacent to a number of residential properties. This includes the following:

- upper floors of 158/159 Drury Lane
- no.8-12 Parker Street
- and, to its Northern end, the site also partially opposes nos.40-39 Great Queen Street that include residential units at upper floors.

158/159 Drury Lane

- 6.6. These properties host two commercial units at ground floor level. The upper floors of the two properties have been combined to provide a total of five flats with a single shared entrance (see planning history). These flats are dual aspect, with front aspects over Drury Lane and rear aspects along the shared rear lightwell of the city block. Based on what was observed on site, it is understood that these units are laid out as follows: Flat 1 (one bedroom first floor flat, 158), flat 2 (one bedroom first floor, 159), flat 3 (second floor two bedroom flat, 158/159), flat 4 (third floor two bedroom flat, 158/159), flat 5 (two bedroom flat to mansard roof, 158/159). During the site visit it was observed that flats tended to host bedrooms to the front overlooking Drury Lane and living rooms to the rear.
- 6.7. No part of the proposed development would extend within the front aspect of these properties, meaning that the rear aspect only needs further investigation. The existing rear elevations of these properties are shown in the photographs below.



Images 1 & 2 - Rear elevations of no.158/159 Drury Lane @1st floor level (bay window and above, buff brick to the right of image 2 is the rear of the application site)

- 6.8. As the proposed roof extensions to the main building would extend the existing rear elevation upwards, the addition of this mass would not project in front of the existing views afforded from these rear facing windows and there would be little impact on outlook affecting them.
- 6.9. As well as roof extensions, the proposal would also include a first floor rear extension replacing the existing fire escape. At present, these units have a rear, north eastern aspect across the application site and further along the shared lightwell. This aspect due to the existing built environment is already partially obscured and is further obscured by the large metal escape stair. The existing staircase is not fully enclosed, meaning that some views/light can penetrate through the stair, however, it remains an imposing feature. As a result, these units currently feature have strained rear aspects at present due to its existing building arrangement. The existing/proposed sections are shown below;

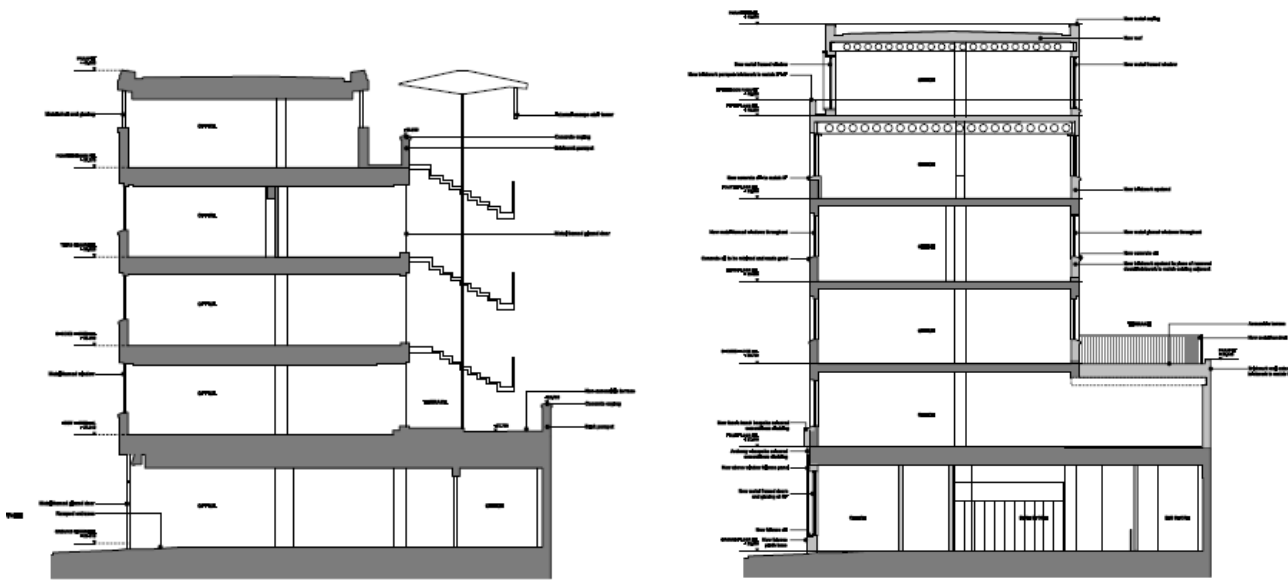


Figure 03: Existing and proposed section

- 6.10. Therefore, the proposed removal of the existing staircase is welcomed and provides a greater separation distance from the proposed application to the rear of neighbouring properties.
- 6.11. The fourth-floor level extension would not detrimentally impact the outlook for these properties between 1st and 3rd floor levels as it would extrude the existing building elevation upwards. However, this extension would project in front of the rear aspect to the rear windows and terrace of the top floor roof flat. This increased mass would result in some loss of outlook from these windows/terrace. However, given that it only projects slighter deeper than the existing, this proposed additional mass would still enable rear views to be afforded from the majority of its windows (158/159). Though this would cause the existing situation to change to a degree for the occupants of this unit, it is not considered that this addition would result in a harmful loss of outlook.
- 6.12. The final element for consideration to these units is the first floor rear extension. Given the height of the first floor rear extension relative to the rear windows to 158/159, it would not impede rear aspects from flats at 2nd, 3rd or 4th floor level (flats 3-5). The extension would however project in front of the full rear aspect of the first floor units (flats 1 and 2), which feature living rooms and terraces to their rear. This aspect of the works would cause loss of views along the shared lightwell. That said, the proposed extension would still allow these windows views above the extension and as such outlook towards the sky would still be afforded. It is acknowledged that this element of the proposal would become much more imposing in these rear outlooks than the existing situation. However, the resulting situation of having the external amenity space enclosed to single storey level is not uncommon for a dense urban area such as this and views towards the sky would still be afforded. Whilst the rear amenity space and outlook would become enclosed to a greater degree as a result of the extensions, given the existing situation, this is not considered so severe to warrant a reason for refusal on the basis of loss of outlook / overbearing visual impact. It is also noted that the primary, southern aspect to these units would be unaffected by the development.

Parker Street

- 6.13. Adjacent to the application site, 8-24 Parker Street runs to the North East and is host to a number of residential units. The property hosts a number of ground and first floor duplex maisonettes such as nos.8 and 10 Parker Street which are adjacent to the site, as well as, nos.18, 20, 22 and 24 which are situated further along Parker Street. A total of six flats then sit above these units within Market House (12-16 Parker Street) which has a shared entrance in the centre of the building, fronting Parker Street. All of the units are dual aspect, with front aspects over Parker Street and rear aspects into the shared rear lightwell of the city block towards the rear of Great Queen Street. Flat 6 (Market House) has also been extended upwards to give it an additional fifth floor mansard.
- 6.14. No part of the proposed development would extend within the front aspect of these properties, meaning that the rear aspect only needs further investigation. In addition, numbers 18-24 Parker Street are situated too far away (+17m) to be adversely affected by the proposed extensions. The existing rear elevations of these affected properties are also shown in the photographs below.



Images 3 & 4 - Rear elevations of no.8/10 Parker Street (left, GF – 1st) and flats above in Flats 1-6, Market House (right, 2nd – 5th) taken from the rear of the application site

- 6.15. The proposed development would not extend directly in front of the rear aspect of any of these units. The proposed development would lead to a building up of the flank elevation adjacent to a number of windows within this property. The figure below shows the existing and proposed relationship between the property and these adjacent units.

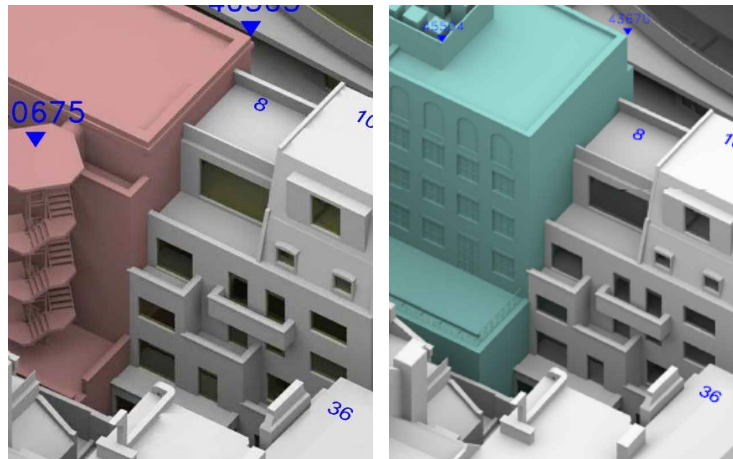


Figure 04: Existing (left) and proposed (right) relationship between site and 8 – 10 Parker Street (GF and 1st floor) and Flats 1-6 (Market House, 12-16) above. 18-24 Parker Street extend off to the right of image

- 6.16. The development would form an upwardly extended flank elevation adjacent to no.8 Parker. The flank elevation formed would project at first floor beyond the existing rear elevation along this boundary. This would sit adjacent to an outdoor amenity terrace. In addition the fourth and the fifth floor addition to the closet wing would build up the height of the existing flank in this position and sit above/adjacent the rear terrace to the top floor flat (flat 5).
- 6.17. As aforementioned, these additions would be readily visible to these residents and would block oblique views from no.8 at first floor and upper floor levels. It is also acknowledged that this would have the effect of making the rear courtyard areas and terrace to nos. 8 and 10 and the rear windows to nos. 8 and 10 making them feel more enclosed. Notwithstanding this, none of these additions would prohibit the main rear or front aspect from these units, with only obliquely angled views being affected. The window affected the most would be the adjacent first floor window to no.8 and terrace at no.8. However, approved plans indicate that this master bedroom is serviced by a secondary pair of French doors. At floors above this, the extensions would act to narrow the oblique field of vision from windows / terraces to flats within Market House (8-16 Parker Street) however, the existing view is towards the rear of 157 Drury Lane and the level of reductions would not be considered to represent detrimental loss of amenity, given the dense urban setting.

40, 39 and 38 Great Queen Street

- 6.18. In terms of outlook, the final properties to be considered are those along Great Queen Street that host commercial units at ground floor level, with residential accommodation above. Those properties beyond no.38 are situated far enough from the development to ensure that there would not be resulting impacts from the extensions proposed. The existing rear elevations of these affected properties are also shown in the photographs below



Images 5 - 8 - Rear elevations of no.40, 39 and 38 Great Queen Street taken from the rear of the application site

- 6.19. All units at upper floors appear to feature dual aspect, with front aspects over Great Queen Street and rear aspects over the shared rear lightwell towards the rear of Parker Street. No.40 is a public house (Philomena's) and records as well as site observations indicate that the top floor is used as ancillary accommodation to the public house. Tax records indicate that no.39 is host to three units and no.38 is host to a single unit at upper floors.
- 6.20. Given its siting, no part of the proposed development would extend within the front aspect of any of these units, meaning that the rear aspect only needs further investigation.
- 6.21. At present, the rear aspects of these units look towards the back of the application site which is already taller by one storey. Whilst some views to the sky are afforded, existing rear aspects do not include any open vistas and this is further impeded by the existing escape stair that sits in close proximity to the rear elevation of no.39. Given the separation distances between main facing rear elevations (+15m), existing relationship and siting of the proposed massing, the additional height to fourth floor and roof extension is not considered to represent an imposing addition within these views. In addition, the removal of stair would partially improve the existing outlook from rear facing properties.
- 6.22. The first floor rear extension would increase the existing flat roof in front of rear facing first floor windows to no.39, though all floors above this would not be impacted by this element. Similarly, this element would not interfere with rear views from the upper floors of no.40 or 38. Approved plans indicate that at first floor level, this property is host to a one bedroom unit. The unit originally featured a living room to the front, overlooking Great Queen Street, with a bedroom and kitchen to the rear. When upper floor extensions were permitted to in 2004 / 2009, approved plans show the layout of this unit to be altered to create a studio flat with the only rear facing window to host the bathroom. A window has been added, to serve this bedroom to the rear elevation of the outrigger, though this was not granted planning permission. Given that in 2004 and 2009, the Council approved the use of the first floor of this property as a studio that was serviced by a rear bathroom window only, the loss of outlook to the additional window later added without permission is not considered to result in the unit having unacceptable standard of amenity. For instance, the studio unit would remain open plan (other than bathroom) with unimpeded southern aspect from three sash windows facing over Great Queen Street. Given the existing, strained outlook from the existing window, the increased impact upon this window from the first-floor massing is not considered to result in detrimental harm.

Privacy

- 6.23. Policy A1 and the amenity CPG states that development should be designed to protect the privacy of both new and existing dwellings to a reasonable degree. The proposed development would include upwards extension to both the main building/closest wing as well as the lightwell at first floor level. In addition, two external terraces are provided at roof level. Given the location of surrounding residential properties the residential units which require closer assessment are also those same properties discussed in the previous section.

Views from new windows

- 6.24. The upwards extensions to both the main building as well as closet wing would introduce new windows at upper floors on the rear elevation facing towards residential properties, however, the location of these windows would be on the same plane as the existing windows to the rear elevation between 1st and 3rd floor levels. Given their separation distance (9m-15.5m) and the difference in height, the addition of these windows to the rear is not considered to cause a detrimental loss of privacy to those units opposing the development (no.40-38 Great Queen Street). Similarly, as views from these windows towards the adjacent 8-10 Parker Street/Market House and 158-159 Drury Lane would be sharply angled down and not dissimilar to existing views, again these properties would not be adversely prejudiced by these windows. It is also noted that the office use is one which tends to have activity through the day, but less so during sensitive evening hours. The first-floor rear extension would not include any windows and as such would not result in any loss of privacy.

External spaces

- 6.25. As well as new windows, the proposed scheme includes a terrace at second floor level. There is a current terrace/ outdoor area which according to local residents has never been in use for amenity purposes. However, this current situation is not controlled via any prohibitive condition and submitted comments have noted that at times, this area has been used by staff members in the past. The proposed terrace would face the rear windows of *Great Queen Street and would be adjacent to 8 Parker Street*. The proposed terrace would be set in from the boundary and surrounded by iron railings. Nevertheless, the proposed terrace would result in views into the rear windows of 38 and 39 Great Queen Street at first and second floor level. Additionally due to the size of the terrace, may give raise to loss of privacy to rear windows at first floor level at 8 Parker Street and 158/159 Drury Lane.
- 6.26. However, it is considered that screening to the terrace can mitigate this impact of loss of privacy. The installation of privacy would ensure no afforded views into the rooms of these properties and would safeguard the amenity of future occupiers and ensure their privacy. A condition will be attached to the permission to ensure these details are provided prior to occupation of the building. Comments relating to the noise from these terraces are discussed in following noise section.

Daylight and Sunlight (BRE)

- 6.27. In order to assess the potential impact of the proposed development to the levels of natural light enjoyed by neighbouring occupiers, a Daylight and Sunlight Report has been submitted by both the applicant and local residents. As a result both reports will be taken into consideration. Both reports have tested existing and proposed situations using the Vertical Sky Component (VSC) and No Sky Line (NSL) for daylight conditions, as well as the Annual Probable Sunlight Hours (APSH) for sunlight conditions. This methodology remains in accordance with the guidance set out in 'Site layout planning for daylight and sunlight: A guide to good practice', more commonly known as 'The BRE Guidelines'.
- 6.28. Vertical Sky Component (VSC) assessment represents the percentage of the total sky that can provide direct light to the centre of the face of the window when neighbouring obstructions are taken into account. The VSC represents a ratio of that part of illuminance that is received directly from an overcast sky on a given vertical plane (or window) to the illuminance on a horizontal plane due to an unobstructed hemisphere of the sky.
- 6.29. No Sky Line (NSL) is the outline on a horizontal 'working plane' (normally 0.85m above ground level for residential) from which no sky can be seen / the area which will received direct light from the sky through the window

- 6.30. The BRE Report states that: 'the diffuse daylighting of the existing building may be adversely affected if either:
- the VSC measured at the centre of an existing main window is less than 27% and less than 0.8 times its former value; or
 - the area of the working plane in a room which can receive direct skylight (the NSL) is reduced to less than 0.8 times its former value.'

6.31. Annual Probable Sunlight Hours (APSH) is a measurement of the long term average of total numbers of hours during a year in which direct sunlight reaches the unobstructed ground (when clouds are taken into account).

6.32. The BRE Report advises that if a window can receive more than one-quarter of APSH, including at least five per cent during the winter months between 21 September and 21 March then the room will still receive adequate sunlight. If the available sunlight falls below this in its existing state, or the sunlight is reduced by the development below this level, then the reduction in sunlight will be unacceptable if there would be a reduction of more than 20 per cent from the current value, either for the annual or winter figure.

6.33. For this application the applicant and the local residents submitted a daylight/sunlight report. As a result both has been taking into consideration and will be discussed below.

6.34. The applicants report has conducted a detailed investigation on the following properties to test potential impacts to natural light on residential properties:

- 159 Drury lane
- 12-18 Parker Street, Market House
- 40 Great Queen Street
- 39 Great Queen Street
- 38 Great Queen Street
- 37 Great Queen Street

6.35. The overall results of the daylight / sunlight analysis from the applicants report are summarised below.

Daylight

VSC –all windows meet BRE guidance levels

NSL – shows that 48 out of 49 rooms (98%) will meet the strict application of the BRE Guidelines. The single transgression is isolated to 40 Great Queen Street and is discussed below. Notwithstanding the isolated transgression, the technical analysis records 12 instances of light betterments when assessed against the 2019 consented baseline.

Sunlight

APSH – of the 29 rooms edible for testing, 100% (29) meet BRE guidance levels for annual levels of sunlight

Applicants study

159 Drury Lane

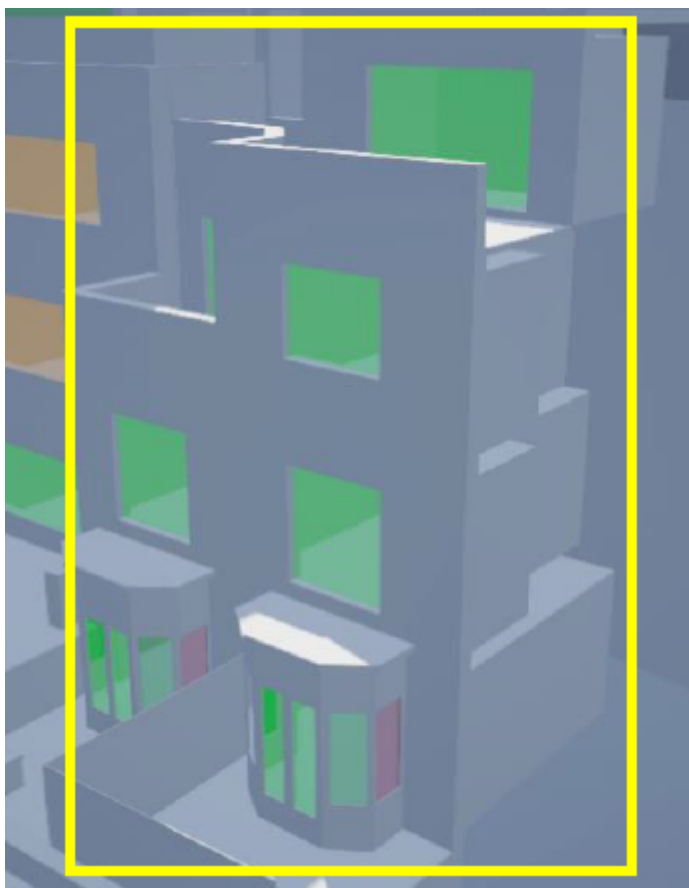
6.36. As aforementioned, this property hosts five residential units at upper floors, all featuring habitable rooms to the rear. A total of 20 windows within this property have been tested within the report.

6.37. In terms of daylight, out of the 20 windows tested to this property, 18 remain in accordance with BRE guidelines in terms of potential losses from daylight. A total of two windows serving three different rooms would be subject to losses of VSC greater than 20%. These would include the rear bay windows at first floor level (159).

6.38. When looking at daylight distribution (NSL), only the two rear rooms at first floor level (159) would be subject to losses between 20.01%-29.9% light of its former value. The analysis records good retained NSL values for each room, reporting 66% and 64% respectively.

6.39. The two first floor units each feature rear chamfered bay windows that include six window panes each. The results show that only two windows (W6/11 and W12/11) out of the total twelve windows within the bay

windows at this level would be notably affected and these are all windows to the Northern side of the bays facing towards the corner junction/flank of the host property. These windows, given their siting and orientation, already feature very low levels of VSC (ranging from 0.1) meaning that even a slight reduction may give a high proportional reduction. Given that the remaining ten glazed panels to these bay windows would not breach BRE guidelines in terms of VSC reductions, this is not considered harmful. Images of the bay windows in question are shown below and are marked in red. In terms of distribution (NSL), these rooms would see reductions of 20.3% and 25.7% of their areas. This remains beyond the BRE guideline of 10% meaning that there would be a reduction in daylight distribution to these rooms. While there would be a light reduction in distribution to these two rooms, given that the majority of windows serving these rooms remain within BRE guidelines for VSC impacts, it is not considered that this impact would be particularly severe. In addition it is noted that these units maintain their existing front aspects unimpaired.



Windows W6/11 and W12/11 with light reduction as a result of the proposal.

6.40. In terms of sunlight, owing to the North Eastern orientation of this rear façade there would be no change to the levels of sunlight received to any room within this property.

Market House & nos.12 - 18 Parker Street

- 6.41. As aforementioned, this section of the adjacent residential block hosts a mixture of residential units between maisonette units as well flats within Market House. A total of 31 windows serving 20 rooms to these units have been tested within the report.
- 6.42. In terms of daylight, out of the 31 windows tested, 29 remain in accordance with BRE guidelines in terms of daylight (VSC). The two windows affected beyond BRE guidelines for daylight are isolated to flat 6 of 12-18 Parker Street. Flat 6 is located within 12-18 Parker Street, Market House and comprises two rooms, a living-kitchen-diner and a bedroom, that have a direct outlook over the Proposed Development on its southern elevation.
- 6.43. Within this flat, 6 out of 8 windows in terms of daylight would meet the strict BRE guidelines. The affected windows (window ref: W6/254 & W1/25) record a light change within 10% beyond the BRE's permissible 20% change from former value. The recorded light change from former value equates to 29% and 27%, respectively.

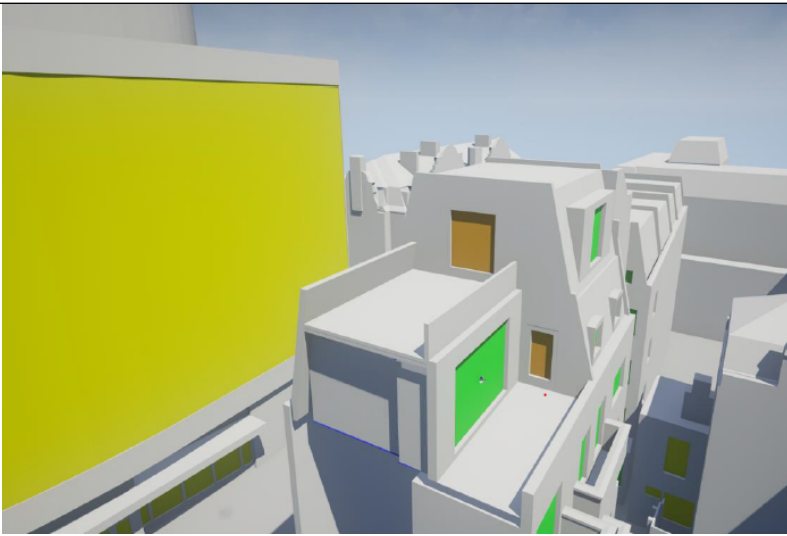


Figure 07 – windows map extract, affected windows highlighted in amber

6.44. The two windows each serve different rooms, a bedroom and living/kitchen dining room. The bedroom (W1/255) would retain a VSC of 23.69% which is still regarded as good for an urban environment, exceeding the target of 15%. Regarding W6/254, it is noted that this affected window is adjoined by 5 fully compliant windows serving the same room

6.45. With regard to daylight distribution (NSL), all the rooms would comply fully with BRE compliance 100%. With this in mind, it is not considered that there is a detrimental loss to any of these units in terms of daylight when considering the character of surrounding area and the existing levels received.

6.46. Concerning sunlight (APSH), all rooms tested would comply with BRE guidelines when looking at annual losses.

40 Great Queen Street

6.47. As aforementioned this property is a public house located to the east of the proposed development, though records indicate that the top floors are used as ancillary (non-self-contained) accommodation. Whilst levels of sunlight reaching these rooms would not be affected by the development (owing to their position and orientation), the submitted reporting shows that in some instances level of daylight would be affected.

6.48. Of the eight windows tested to the rear of this property, 3 windows (window ref: W2/70; W1/71 & W2/71). These would include one at ground floor and two rear windows at first floor (see below).



Figure 08 – windows map extract, affected windows highlighted in amber and red

6.49. At second floor level, the windows would serve the ancillary accommodation. It should be noted that owing to their recessed positioning and the very large flank elevations to both adjoining neighbours, these windows currently feature low level of daylight (3.24%-10.42%). As such, the relatively minor absolute reductions caused leads to a significant loss in percentage terms. These windows currently receive daylight below BRE guideline and the development would further cause some further reduction. While these rear windows would see further losses, the other windows above (at 3rd floor) as well as the 6 front facing windows (south facing) would be unaffected and are already the main sources of natural light. The NSL method of assessment shows that 0 out of 5 rooms will meet the strict application of the BRE Guidelines. Of the affected rooms, 2 rooms (room ref: R1/70 & R2/70) record extremely low NSL values (16% & 14% respectively) and therefore any slight alteration in the outlook will likely trigger a disproportionate change in light. Subsequently, these two rooms record the greatest light reduction beyond the assessment baseline. Rooms on the 1st and 2nd floors (shown in amber and red) are blinkered by the configuration of the neighbouring buildings that challenge the availability of oblique light into the space behind the aperture.

6.50. Given the existing situation and retained access to the windows, the property would not experience a detrimental loss of amenity due to reduction to daylight compared to the existing situation.

Daylight / Sunlight (BRE) summary

6.51. Officers acknowledge that the proposed development is within a dense urban environment, within Zone 1 of Central London, and the design and nature of some of the existing neighbouring buildings is such that there are pre-existing shortfalls in daylighting relative to the normal BRE Standards. It is also noted that due to the aforementioned density of surrounding development, any additional height permitted would result in some loss of daylight to some of these facing windows.

6.52. The submitted reports shows that the works would not materially impact the vast majority of rooms and windows to adjacent properties. As stated above it is noted that the applicant's report finds to have a lesser effect on the baseline because taking the most significant discrepancy, being the Parker Street window W1/255 (window 16), which Point 2 find to be reduced from 32.28% to 23.68% while Right of Light (applicants report) make it 23% being reduced to 15.7%. It is considered even if the VSC is reduced from 23% reduced

to 15.7% this still just about falls within the range 15-20% considered typical (and thus acceptable) for central London contexts.

Local residents study- Rights of Light assessment

- 6.53. From assessing the report, the local residents study differs to the applicant's study as it includes obstructions such as an external staircase, chimneys, exhaust ducting etc which are highly complex and form part of the baseline position but aren't detailed on the drawings included in the Rights of Light assessment (applicant's report).
- 6.54. Point 2 consultants have stated that there will be light available between the stair treads and balustrade, the potential for exacting the light conditions is therefore possible. One reason that there is a difference between the Point 2 results and the Rights to Light Consulting review is that the core (if included in the model – although excluded in their drawings) was considered to be a solid massing rather than a consideration of the component parts.
- 6.55. As a result, the applicant's study (Point 2) modelling finds these to have a lesser effect on the baseline, however even assessing the most significant discrepancy between both reports being the Parker Street window W1/255 (window 16), which Point 2 find to be reduced from 32.28% to 23.68% while Right of Light make it 23% being reduced to 15.7% this still just about falls within the range 15-20% considered typical (and thus acceptable) for central London contexts such as this.
- 6.56. As stated from assessing both reports, it has been shown that a select few windows would experience reductions in levels of daylight to individual windows. However, when considering the existing layouts of units, these impacts would not represent excessive levels of harm. Overall, it is considered that the minor losses experienced to those units identified above would not substantiate a reason for refusal and would remain within an acceptable range given the context.

Noise and disturbance

- 6.57. In accordance with the requirements of policies A1 and A4, due consideration must be paid for any potential issues of noise and disturbances to residential occupiers in the local area arising from the proposed development.

Terrace

- 6.58. As outlined above the proposal would include a roof terrace at second floor level towards the rear of the building facing residential blocks. The potential loss of privacy has been addressed above with the installation of privacy screens to prevent any direct views into residential properties. However due to the close proximity to the residential properties it is considered necessary to limit the use of the terrace to normal office hours of Monday to Friday 9am to 7pm. This is secured by planning condition.

Use/management

- 6.59. In terms of noise generated from the uses proposed. The use of the office building itself would not give rise to significant levels of noise, particularly given the conditions recommended to restrict access to the roof terrace adjacent to Parker Street properties. In order to ensure that these measures are designed to fully attenuate sound to neighbouring properties, full details will be secured via condition. Given that the cycle store would be within the envelope of the building is it not considered to cause adverse in terms of noise. Additionally, is it not considered necessary to request the bin and cycle store to be 100% passive.
- 6.60. In light of the conditions set out above, it is not concerned that the use of the development would give rise to any issues of detrimental noise or disturbances, or the need for future mitigation measures to be secured.

Plant equipment

- 6.61. As part of the overhaul of the building, a full replacement of plant system is proposed. The proposal includes the installation of 9 No. external condenser units (and the removal of the existing plant). The units will be arranged on the rear 1st floor roof and within an open topped plant enclosure at main roof level. Acoustic measures and anti vibration mounts will be incorporated as required.

6.62. A Noise Impact Assessment has been submitted in support of the application that has tested the noise emission levels of the proposed plant and predicted the changes in noise levels experience at the closest sensitive received compared to existing background levels. The report seeks to demonstrate that the development would avoid noise from plant would not give rise to adverse impacts on health and quality of life as a result of new development. The report has been prepared in line with industry standards.

6.63. This has been assessed by the Council's Environmental Health (Noise) officers who confirm that they are satisfied with the submitted acoustic assessment and are supportive of the development, subject to the application of conditions. These would include requiring the plant equipment to be installed with anti-vibration measures and for a restrictive condition to ensure future compliance in terms of emissions and to keep the equipment well maintained. Subject to the application of the conditions recommended, the replacement plant equipment would not give rise to any harmful impact to amenity. This would include the application of sound attenuation measures to the plant equipment itself as well as the plant room.

Construction impacts and impacts to local business

6.64. Due to the level of works proposed as well as the limited site access, concern is raised with regard to the subsequent impacts and disturbances caused to local residents and businesses during the construction phase of development if not properly managed. In accordance with policy A1, where development sites have the potential to cause significant disturbance due to their location or the anticipated length of excavation or construction period, measures required to reduce the impacts of construction works must be secured via a Construction Management Plan (CMP). In this instance a CMP would be required in order to identify the potential impacts of the excavation and construction phase and state how the potential negative impacts will be mitigated against.

6.65. A draft CMP has been provided upfront with the application and has already been negotiated with the Council's Transport officers. This will be further discussed in the Transport section of the report.

Residential amenity conclusion

6.66. Due to the extent and positioning of the proposed extensions in relation to surrounding residential properties, the development would not be considered to result in any detrimental loss of outlook given the existing context. Subject to securing conditions for screening and limiting of hours of use of the terrace adjacent to Parker Street, the scheme would similarly not result in any undue loss of privacy for surrounding occupiers. The development would cause some select windows to undergo a noticeable reduction in daylight when measured against BRE standards. However, when considering the layouts and use of rooms, positioning of windows as well as existing conditions, these impacts are not considered to result in excessive levels of harm.

6.67. In order to ensure that the proposed uses do not result in issues of noise and disturbances to local residents a raft of measures are recommended, including limits to servicing hours and the restriction of primary cooking from occurring. Similarly, noise measures for the new plant equipment outlined in submitted reporting will be secured to ensure that plant remains duly attenuated for noise and vibrations.

6.68. To ensure that the demolition and construction of proposed works are fully considered in relation to the potential impacts upon local residents and businesses, a Construction Management Plan will need to be secured under a s106 legal agreement. This will also include the requirement for a Community Liaison Working Group to be formed during the course of the works. With such extensive mitigation controls in place, it is not considered that the construction works would cause any protected group to be disproportionately affected

6.69. Overall, subject to the suggested conditions and planning obligations, the proposal is considered to remain acceptable in terms of impacts on neighbouring and local amenity, both during the after the construction period.

7. Transport considerations

7.1. Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough; Policy T2 seeks to limit the availability of parking in the borough and requires all new development in the borough to be car-free; Policy T3 seeks improvements to transport infrastructure in the

borough; and Policy T4 promotes the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.

- 7.2. In line with Policy T1 of the Camden Local Plan, we expect cycle parking at developments to be provided in accordance with the standards set out in the London Plan. For offices, the requirement is for 1 space per 75 sqm for long stay and 1 space per 500 sqm for short stay, which would give a requirement for 4 long stay spaces and 1 short stay space. The applicant is proposing to provide 22 long stay spaces in the form of two tier racks and 1 non-standard cycle space in a Sheffield stand in a cycle store on the ground floor. This would be accessed via a wide doorway on Parker Street. Showers and a drying room would also be provided. The provision of the 23 cycle parking spaces should be secured by condition. Existing cycle parking for visitors is provided in the form of 3 M-shaped stands on Drury Lane outside the front of the site, whilst a TfL cycle docking station is located just to the south of this on Drury Lane.
- 7.3. In accordance with Policy T2 of the Camden Local Plan, which seeks car free development across the Borough, no off-street parking is currently provided and none is proposed. The development should be secured as Business parking permit (car) free by means of a Section 106 Agreement. This arrangement was previously secured against the approved scheme. This will prevent the future occupants from adding to existing on-street parking pressures, traffic congestion and air pollution, whilst encouraging the use of more sustainable modes such as walking, cycling and public transport.
- 7.4. Given the uplift in trips associated with the development, a draft Travel Plan has been submitted in support of the application. This will need to be updated prior to occupation (not commencement) once a clearer view of the future occupants is available. The Travel Plan and associated Monitoring and Measures Contribution of £5,196 should be secured by means of the Section 106 Agreement.
- 7.5. Given the uplift in trips and activity at the site, a Pedestrian, Cycling and Environmental improvements contribution of £13,500 should be secured by means of the Section 106 Agreement. This would be used towards providing improved pedestrian and cyclist facilities in the vicinity of the site.

Servicing

- 7.6. The proposed development is expected to lead to a minor increase in servicing at the development, but the increase in delivery numbers is not expected to be excessive. Given that the site is serviced on-street at present from the loading bay on Parker Street and there are no proposals to alter this arrangement, it is considered that a Servicing Management Plan is unnecessary for this development.

Construction Management

- 7.7. Given the Central London location of the site and its proximity to a number of residential properties and the theatre on the opposite side of Parker Street, it is recommended that a Construction Management Plan and associated Implementation Support Contribution of £4,075.60 and Impact Bond of £7,874 be secured by means of the Section 106 Agreement. This will help ensure that the development is carried out without unduly affecting neighbouring amenity or the safe and efficient operation of the local highway network, in accordance with Policy A1 of the Camden Local Plan. A draft CMP has been submitted in support of the application but this will need to be updated once a principal contractor has been appointed and submitted for approval prior to works commencing on site. As with the approved scheme, given the proximity of neighbours and local consultation groups, including the CAAC, it is recommended that a Construction Working Group be set up to oversee the CMP process and provide feedback to the developer as the scheme progresses.
- 7.8. In addition to the CMP, a further transport obligation will be necessary to secure a highways contribution to cover the cost of repairing any damage to the public footway caused during construction. This contribution is calculated by the Council's highways engineers based upon the exact cost of repairs, with payment to be taken upon commencement and held as a bond in case of damage.

8. Waste and recycling;

- 8.1. Policy CC5 of the Local Plan seeks to make Camden a low waste borough. The policy seeks to reduce the amount of waste produced in the borough and increase recycling. It also aims to ensure that developments include facilities for the storage and collection of waste and recycling.

8.2. The proposals would include a dedicated commercial refuse store towards the rear of the site at ground floor level with direct access to Parker Street. This would contain sufficient space for the storage of both waste and recycling. This provision would be considerable acceptable and to accord with the Council's design guidance. The proposals for waste and recycling storage are considered to be acceptable. A suitable condition is suggested to ensure that the waste and recycling facilities are provided prior to the first occupation of the building.

9. Sustainability and Air quality

9.1. Policy CC1 requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Policy CC2 requires development to be resilient to climate change by adopting climate change adaptation measures.

9.2. The applicant has provided an Energy and Sustainability Statement with their application. This sets out the ways in which the development will reduce carbon emissions and increase the energy efficiency of the building.

9.3. The statement notes that the proposed energy strategy follows the energy hierarchy: Be Lean, Be Clean, Be Green. This reporting includes a robust and thorough proposal and justification for the measures included at each stage. The Council's Sustainability Officer has assessed the application and is satisfied with the carbon assessment. These savings would accord with policy requirements and are welcomed.

9.4. As well as assessing energy demands and measures, the submitted reporting also includes an indicative BREEAM Pre-Assessment to demonstrate the sustainability performance of the proposed building. This predicts that the new building would achieve a BREEAM 'Excellent' rating (with a minimum of 70% required for an 'Excellent' rating). In addition, targets by 'type' (i.e. energy, water and materials) all exceed the policy requirements.

9.5. The submitted reporting therefore demonstrates that the proposed development would comply to local / regional policy requirements in relation to energy and sustainability. In order to ensure that the final construction deliveries upon these predictions and that the saving measures are monitored and maintained, an obligation for a Sustainability Plan to include BREEAM Excellent rating shall be secured through the legal agreement.

9.6. Finally, in order to test the potential impacts to local air quality and to test for risks for future users of the site, an Air Quality Assessment has been provided. The assessment demonstrates that despite its central location, the development can be controlled to avoid any adverse impacts to air quality. During the construction works, a range of best practice mitigation measures are set out to reduce dust emissions and ensure that the overall effect will be 'not significant'. Such measures will be secured through the CMP obligation. Once constructed, the reports demonstrates that users of the site will experience acceptable air quality and that its operation would produce insignificant impacts on existing sensitive receptors.

9.7. The Council's Sustainability Officer has assessed the application and identified for the construction/demotion period there is a medium air quality risk and as a result air quality monitoring will need to be installed prior to works commencing. Therefore relevant conditions and informative will be attached to the permission. In order to ensure that non-road mobile machinery used during constructions meet stipulations in terms of emissions, a condition is recommended. The development therefore remains in accordance with policy CC4 (Air quality).

10. Section 106 legal agreement and Community Infrastructure Levy (CIL).

10.1. In light of the above assessment, the following contributions are required to mitigate the impact of the development upon the local area, including on local services. These heads of terms will mitigate impacts of the proposal on the infrastructure of the area.

Obligation
Car free development (commercial)
Construction Management Plan plus monitoring fee £4,075.60
Impact Bond of £7,874
Construction Community Liaison Working Group

Energy efficiency and Sustainability Plan
Highways contribution in case of damage £7,502.61
Payment in lieu of affordable housing contribution £81,000
Retention of project architects
Pedestrian, Cycling and Environmental improvements contribution- £13,500
Travel Plan and associated Monitoring and Measures Contribution- £5,196

10.2. The proposal will be liable for the Mayor of London's CIL. Camden is in charging Zone 1 where the Mayoral CIL rate is £50/sqm. The proposal will also be liable for the Camden CIL. The application site is in charging Zone A. The Camden CIL rate for office development in Zone A is £45/sqm. CIL payments will be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment. CIL charges are subject to indexation in line with the construction costs index.

11. CONCLUSION

11.1. Overall the development would represent a sustainable form of development that would allow for the land use optimisation of the site for employment purposes within a highly accessible location within the Central Activities Zone. It would allow for an existing, low quality building (both in terms of aesthetics and spatial as well as energy efficiencies) to be fully overhauled and extended in order to provide a modern-spec office building with flexible internal arrangement without the need for demolition. The office uplift is considered appropriate for the building and in a suitable location. The lack of provision of housing on-site has been satisfactorily justified, and a fully policy compliant payment in lieu would instead be paid to help fund the provision of affordable housing elsewhere in the Borough. This would represent a sizable contribution and would contribute towards the Council's targets for affordable provision.

11.2. The proposal is considered to be acceptable in terms of heritage and design considerations, including the impact on the Bloomsbury Conservation Area and nearby listed buildings. The works would act to apply a well detailed architectural response to a building currently considered a neutral contribution within the CA. The elevational treatment and extensions have been subject to a high level of scrutiny both by Council Urban Design and Conservation officer, all of whom now support the scheme. In order to ensure that the final build remains of excellent quality, various design conditions are secured as well as an obligation for the project architects to be retained, unless otherwise approved. The proposed extensions and construction phase will inevitably cause some disruption, however, the development would not be considered to result in a detrimental loss of amenity to any neighbouring occupiers or premise and stringent mitigation measure are to be secured to alleviate construction impacts. Similarly, the proposal is considered to be acceptable in terms of its transport implications and its waste and recycling, sustainability and air quality considerations.

11.3. On balance, the development would not include any material breaches of development plan policies and would help to deliver employment floorspace in an area targeted for future growth as well as a range of other benefits such as improving the design, longevity and sustainability of the existing building. The development is consequently seen as being in accordance with the development plan.

12. RECOMMENDATION:

12.1. Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement covering the following Heads of Terms:-

- Car free development (commercial)
- Construction Management Plan plus monitoring fee
- Impact Bond
- Energy efficiency and Sustainability Plan
- Highways contribution in case of damage
- Payment in lieu of affordable housing contribution
- Retention of project architects
- Pedestrian, Cycling and Environmental improvements contribution
- Travel Plan

The decision to refer an application to Planning Committee lies with the Director of Regeneration and Planning. Following the Members Briefing panel on Monday 4th December 2023, nominated members will advise whether they consider this application should be reported to the Planning Committee. For further information, please go to www.camden.gov.uk and search for 'Members Briefing'.

Application ref: 2023/2245/P
Contact: Enya Fogarty
Tel: 020 7974 8964
Date: 28 November 2023

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: 020 7974 4444

planning@camden.gov.uk
www.camden.gov.uk/planning

Gerald Eve LLP
Gerald Eve LLP
1 Fitzroy Place
6 Mortimer Street
London
W1T3JJ

Dear Sir/Madam

DRAFT
FOR INFORMATION ONLY - THIS IS NOT A FORMAL DECISION
Town and Country Planning Act 1990 (as amended)

DECISION SUBJECT TO A SECTION 106 LEGAL AGREEMENT

Address:

160-161

Drury Lane

London

Camden

WC2B 5PN

Proposal:

DECISION
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.

Drawing Nos: P001/-; P099/-; P100/-; P101/-; P102/-; P103/-; P104/-; P105/-; P106/-; P120/-; P121/-; P122/-; P123/- P124/-; P130/-; P131/-; P199/-; P200/-; P201/-; P203/-; P204/-; P205/-; P206/-; P207/-; P401/-; P402/-; P404/-; P500/-; P202/A; P403/A; P501/A; P400/A; Design and Access Statement dated May 2023 prepared by Ben Adams Architect; Air quality assessment dated May 2023 prepared by Air Quality Consultants; Breem Pre Assessment dated 04/05/2023 prepared by Caldwell Group; Circular Economy and Whole Life Cycle Analysis Statement dated 16/05/2023 prepared by Caldwell Group; Energy and Sustainability Report dated 31/05/2023 prepared by Caldwell Group; GLA Carbon Emissions Reporting Spreadsheet; WLC GLA Spreadsheet; Outline Structural Statement dated 12/05/23 prepared Ian Black Consulting LTD; Environmental Noise Assessment prepared Acoustics Plus; Construction/Demolition Management Plan; Statement of community involvement dated MAY 2023 prepared by McAleer and Rushe; Daylight and sunlight report dated MAY 2023 prepared by Point 2 Surveyors Limited; Town Planning Statement dated May 2023 prepared McAleer & Rushe Contracts UK Ltd; Residential Assessment prepared

by Ben Adams Architects; Servicing & Deliveries Management Plan (SDMP) dated May 2023 prepared by Transport planning and highway solutions; Transport Statement dated May 2023 prepared by Transport planning and highway solutions; Travel plan dated May 2023 prepared by Transport planning and highway solutions; Ventilation Strategy Statement dated April 2023 prepared by Caldwell

The Council has considered your application and decided to grant permission subject to the conditions and informatives (if applicable) listed below **AND** subject to the successful conclusion of a Section 106 Legal Agreement.

The matter has been referred to the Council's Legal Department and you will be contacted shortly. If you wish to discuss the matter please contact **Aidan Brookes** in the Legal Department on **020 7 974 1947**.

Once the Legal Agreement has been concluded, the formal decision letter will be sent to you.

Condition(s) and Reason(s):

- 1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:

P001/-; P099/-; P100/-; P101/-; P102/-;P103/-; P104/-; P105/-; P106/-;P120/-;P121/-; P122/-; P123/- P124/-; P130/-; P131/-; P199/-;P200/-;P201/-; P203/-; P204/-; P205/-; P206/-; P207/-; P401/-; P402/-; P404/-; P500/-; P202/A; P403/A; P501/A; P400/A; Design and Access Statement dated May 2023 prepared by Ben Adams Architect; Air quality assessment dated May 2023 prepared by Air Quality Consultants; Breem Pre Assessment dated 04/05/2023 prepared by Caldwell Group; Circular Economy and Whole Life Cycle Analysis Statement dated 16/05/2023 prepared by Caldwell Group; Energy and Sustainability Report dated 31/05/2023 prepared by Caldwell Group; GLA Carbon Emissions Reporting Spreadsheet; WLC GLA Spreadsheet; Outline Structural Statement dated 12/05/23 prepared Ian Black Consulting LTD; Environmental Noise Assessment prepared Acoustics Plus; Construction/Demolition Management Plan; Statement of community involvement dated MAY 2023 prepared by McAleer and Rushe; Daylight and sunlight report dated MAY 2023 prepared by Point 2 Surveyors Limited; Town Planning Statement dated May 2023 prepared McAleer & Rushe Contracts UK Ltd; Residential Assessment prepared by Ben Adams Architects; Servicing & Deliveries Management Plan (SDMP) dated May 2023 prepared by Transport planning and highway solutions; Transport Statement dated May 2023 prepared by Transport planning and highway solutions; Travel plan dated May 2023 prepared by Transport planning and highway solutions; Ventilation Strategy Statement dated April 2023 prepared by Caldwell

Reason: For the avoidance of doubt and in the interest of proper planning.

3 Before the relevant part of the work is begun, detailed drawings or samples of materials as appropriate, in respect of the following shall be submitted to and approved in writing by the local planning authority. Submitted details shall include elevations and sections (and where appropriate materials) at 1:10 of the following:

a) Full details of proposed roof extension including parapet junction

(plans, elevations and sections @1:20);

b) Materials sample for roof extension;

a) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10;

b) Sample panel of the proposed brickwork (including main building and chamfered set-backs) to show type, colour, bond, mortar mix, joint and pointing to be provided on site;

c) Sample panel of perforated metalwork and reconstituted stonework to be provided on site;

d.) Details of the retail shopfront at a scale of 1:20 to include windows, doors and fascia area

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017

4 No primary cooking shall take place within any part of the development hereby approved.

Reason: In the interests of the amenity of neighbouring occupiers in accordance with policies G1, A1 and A4 of the London Borough of Camden Local Plan 2017

5 All servicing shall take place in accordance with the approved serving management plan, and shall not take place outside of the following times: 08:00-20:00 Monday-Saturday, and 09:00-20:00 Sundays and bank holidays.

Reason: To avoid obstruction of the surrounding streets and to safeguard amenities of adjacent premises in accordance with the requirements of policies A1, A4, TC2 and T4 of the London Borough of Camden Local Plan 2017

6 No music shall be played on the premises in such a way as to be audible within any adjoining premises or on the adjoining highway.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, CC1, D1, A1, A4, TC1 and TC2 of the London Borough of Camden Local Plan 2017

- 7 The refuse and recycling storage facilities as shown on ground floor plans hereby approved shall be provided prior to the first occupation of the development and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1 and A4 of the London Borough of Camden Local Plan 2017

- 8 The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity and thereafter be permanently retained.

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017

- 9 Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017

- 10 Air quality monitoring should be implemented on site. No development shall take place until

a. prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;

b. a confirmation email should be sent to airquality@camden.gov.uk no later than one day after the monitors have been installed with photographic evidence in line with the approved details.

c. prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing.

The monitors shall be retained and maintained on site in the locations agreed with the local planning authority for the duration of the development works, monthly summary reports and automatic notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be submitted to the Local Planning Authority and approved in writing.

Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan Policies.

- 11 No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).

Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the Camden Local Plan 2017.

- 12 "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement."

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure.

- 13 Prior to the first use of the roof terrace details of a privacy screen to prevent unacceptable overlooking into neighbouring properties shall be submitted to and approved in writing with the Local Planning Authority. The roof terrace shall not be used or accessed, other than for emergency egress, until the approved privacy screen has been fully installed and the approved privacy screen shall thereafter be retained for the duration of the development.

Reason: In order to prevent unreasonable overlooking of neighbouring premises in accordance with policy A1 of the Camden Local Plan 2017.

Informative(s):

- 1 This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
- 2 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).

- 3 All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)

Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.

- 4 Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.
- 5 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with paragraph 38 of the National Planning Policy Framework 2023.

You can find advice about your rights of appeal at:

<https://www.gov.uk/appeal-planning-decision>.

Yours faithfully

Supporting Communities Directorate