



London Borough of Camden
Planning Department
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18th December 2023

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BY EMAIL ONLY

Dear Sir/Madam

Application for installation of a terrace area at roof level to provide outdoor space for existing offices at 24-28 Bloomsbury Way, London WC1A 2SN

Rackham Planning are instructed by Runway East ("the Applicant") to submit an application for planning permission for the installation of a terrace area at roof level to provide outdoor space for the existing office accommodation at 24-28 Bloomsbury Way, London WC1A 2SN ("the Application Site" / "the Site").

The proposal would facilitate the use of the roof of the rear (northern) 4-storey element of the building, behind the 5-storey street frontage element, as open space for those working within the refurbished workspace. It involves creation of a plinth, balustrades and siting of outdoor furniture. The existing building is already in an office use, within Class E of the Town and Country Planning (Use Classes) Order (As Amended). There is no change proposed or required to the lawful use.

The building is occupied by Runway East, a serviced office provider established in 2014. The company currently operates nine serviced office buildings across the UK, including six in London. The site subject to this application proposal is a new acquisition, which opened in November 2023.

The building has undergone a sustainably focused internal re-fit. The majority of these works are internal and do not require planning permission. A separate application for the installation of a new Heating, Ventilation and Air Conditioning (HVAC) system has been submitted to the Council and registered under ref: 2023/3777/P. An application for replacement cycle storage for office occupiers has also been submitted under ref: 2023/4668/P.

The investment in the building will deliver 45,000 sqft of flexible and attractive office space to suit modern businesses. The provision of an area of outdoor space in the heart of the City is considered a key part of delivering a modern workspace.

The proposal is accompanied by both Noise and Heritage Impact Assessments, which demonstrate that the proposal (both in terms of appearance and use) would not result in any unacceptable impacts

on the environment surrounding the site, notably its location within the Bloomsbury Conservation Area (CA) and on the amenity of existing local residents. In this respect, pre-application consultation has been undertaken with local residents to inform them of the proposed use of the roof terrace. A drop-in session was held and further site meeting with the nearest neighbour to demonstrate the proposed impact. This consultation supports the conclusion in the Acoustic Report that the change in noise levels as a result of the proposal would be negligible, and that set out in the Heritage Report that the proposal would preserve the significance of the surrounding Heritage Assets.

Site and Surroundings

The site is part of a development block that is located immediately to the north of the junction between the A40 Bloomsbury Way and Bury Place, approximately 30m south-west of Bloomsbury Square Garden, and 80m south-east of the British Museum. Great Russell Street runs to the north of the block. **Image 1** map shows the site location.

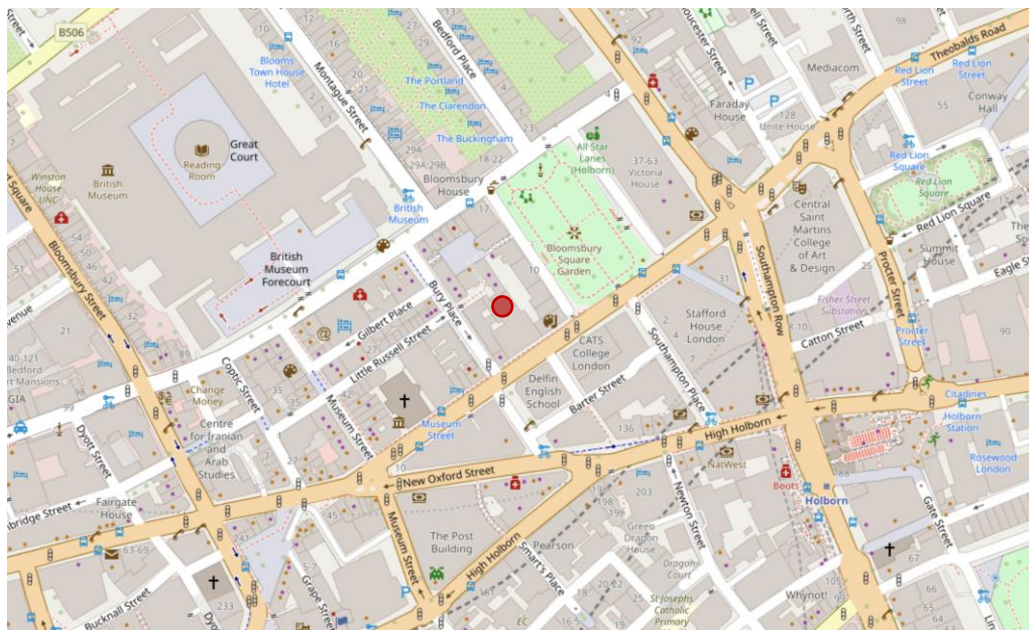


Image 1 - Site Location (source: open street map)

The surrounding area has a distinctive gridded street pattern containing small blocks of development with prevailing height of 4-6 storeys (**image 2**). The area was first comprehensively re-developed in the late 17th Century with many of the terraces being rebuilt and re-fronted during the mid-19th Century, adding variety to elevational treatments along the streets. The wider area contains a range of uses including residential, business, and culture and entertainment, with the British Museum and Nicholas Hawksmoor designed St George's Church being among the most significant and prominent buildings.



Image 2 – Aerial photograph of site and surrounding streets with building and location of proposed roof terrace outlined (source: Google maps)

The building subject to this application is part 5-storey and part 4-storey in scale (**image 3**), with additional floorspace accommodated at lower ground / basement level. The part of the building fronting Bloomsbury Way is the tallest element (**image 2**) with a mansard roof providing accommodation at the fourth floor. The ground floor façade is in stone, with the upper floors faced in red brick, with stone detailing.

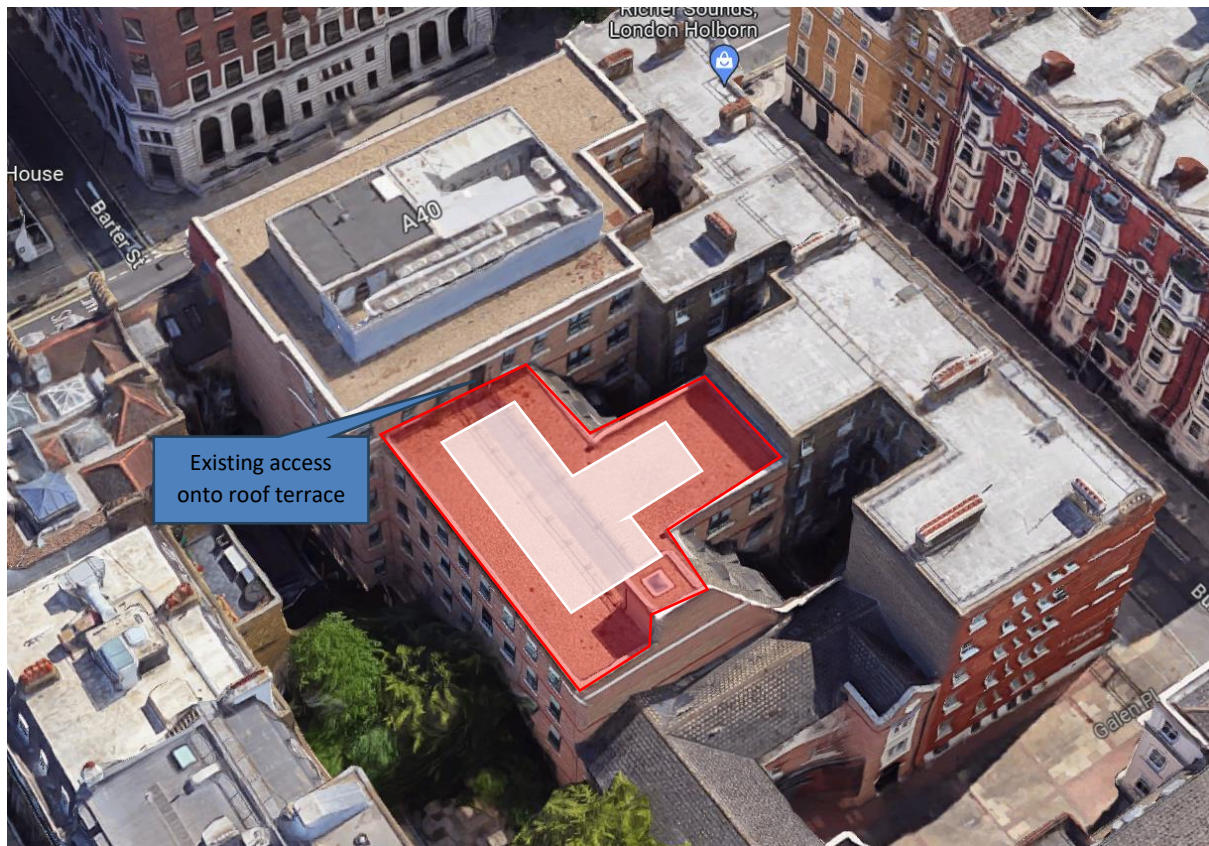


Image 3 – Aerial photograph application site with location of proposed roof outlined in red and terrace indicated in white (source: Google maps)

To the rear/north of the frontage element is a flat roof element above the third floor of the building, which is the proposed location of the terrace area (**image 3**). The roof is a 'T' shape, with a maximum width of c.20m (north-west to south-east) and a length of c.19m. There is an existing access onto the roof from the south via the main frontage element of the building, together with a separate access from the northern stair core.

Below this, the office accommodation within the second and third floors of the rear part of the building include a two-storey mansard roof with windows, sloping down to the south-west towards Russell Chambers mansion block and Bury Place, the street beyond. The roof of the application building adjoins Russell Chambers, with two voids either side, terminating at lower ground level.

The frontage to Bloomsbury Way is approximately 30m in width and the building extends back some 45m within the plot. It adjoins Charlton House (23 Bloomsbury Way)/5 Bloomsbury Garden Square to the north-east, and 29 Bloomsbury Way (occupied by Richer Sounds) to the south-east, with Russell Chambers, a Mansion style block, also adjoining to the east and fronting Bury Place (**image 4**).



Image 4 – Aerial photograph showing surrounding buildings (source: Google maps)

The Camden Local Plan Policies Map (image 5) confirms that the site is within the following designated areas:

- Bloomsbury Conservation Area;
- Central London Area (CLA); and
- Archaeological Priority Area (2017).

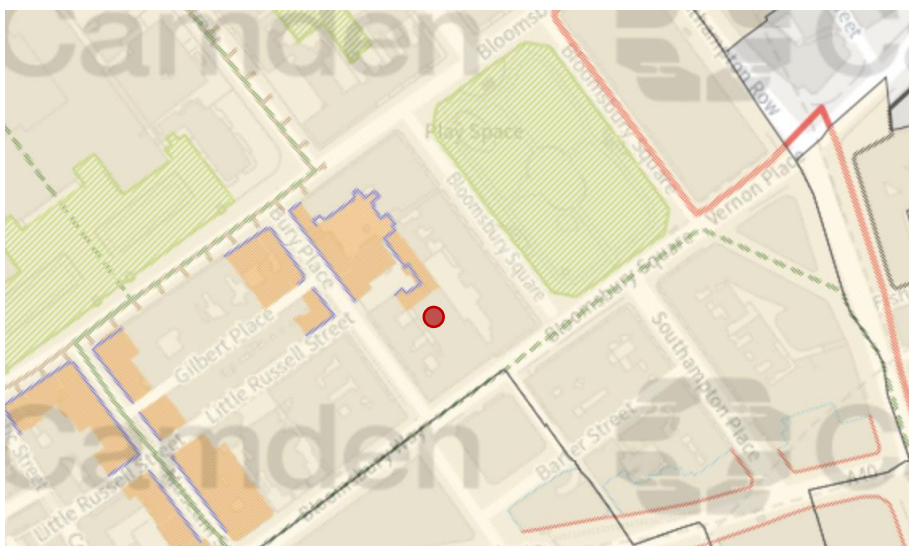


Image 5 - Camden Policies Map Extract (source: Camden Council)

The land to the north and north-west around Pied Bull Yard and the upper part of Bury Place are allocated as primary shopping frontages. Bloomsbury Square Gardens is also designated as Local Open Space. However, there are no other relevant designations covering the site. The site is not covered by a Neighbourhood Plan Area or Forum.

According to the Historic England Map (**image 6**), the adjacent Charlton House (23 Bloomsbury Way)/5 Bloomsbury Garden Square and the railings are Grade II Listed, with 6 Bloomsbury Garden Square together with the railings and lamp holder being Grade II* Listed.

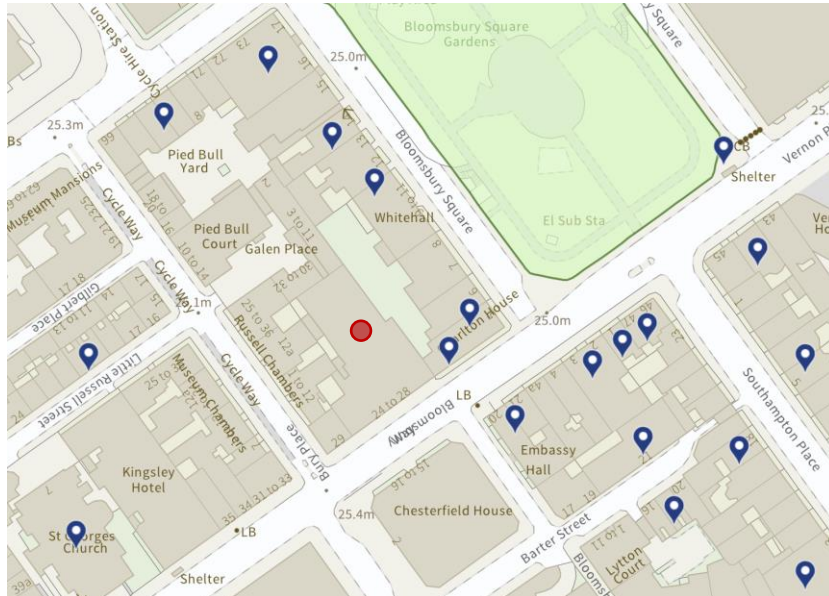


Image 6 – Historic England Map Search Extract (source: historicengland.org)

Other Listed Buildings in the immediate surrounds of the site include, the White Hall Hotel (9-11 Bloomsbury Garden Square (Grade II), 14 Bloomsbury Garden Square (Grade II), the Royal Pharmaceutical Society buildings at 16-17 Bloomsbury Garden Square (Grade II), 66-71 Great Russell Street (Grade II). In addition, 20-21 Bloomsbury Way, diagonally opposite the site frontage to the south-east is also Grade II Listed. The Hawksmoor designed Grade I Listed St George’s Church is located further to the south-west along Bloomsbury Way.

Bloomsbury Conservation Area Appraisal and Management Strategy (Adopted 18 April 2011) confirms that the application site/subject building is a ‘positive building’ in the context of Sub Area 7 (Museum Street/Great Russell Street) of the Conservation Area. The remainder of the buildings within the development bloc, including those immediately to the south-east along Bury Place are also deemed to be positive buildings.

The surrounding heritage assets are discussed in further detail within the accompanying Heritage Impact Assessment by the Heritage Collective (HC).

Planning History

The recent Planning history of the site is summarised in the table below, sourced from the Council’s online records. However, other than the current application for the installation of new HVAC equipment on the lower ground floor, all previous proposals were progressed prior to the current applicant having an interest in the building.

Reference	Proposal	Decision	Date
TBC	Installation of Heating, Ventilation and Air Conditioning (HVAC) equipment	Pending	TBC
2017/6518/P	Installation of 3 x air conditioning units at lower ground floor within the partially enclosed passage.	Granted	Feb 26 2018
2012/3397/P	Installation of a condenser unit on south-west elevation at lower ground floor level of office building (Class B1)	Granted	Oct 2 2012
2012/2076/P	Erection of a roof extension and terrace at fourth floor level of office building (Class B1).	Withdrawn	Jun 29 2012
2012/0790/P	Variation of condition 3 (development built in accordance with approved plans) of planning permission ref 2011/1243/P dated 23/05/2011 for the installation of roof level plant within acoustic enclosure and replacement of all windows from aluminium to crittal framed double glazed windows of offices (Class B1a), namely for the installation of a condenser on the south-west elevation at lower ground floor level.	Withdrawn	Jun 15 2012
2011/1243/P	Installation of roof level plant within acoustic enclosure and replacement of all windows from aluminium to crittal framed double glazed windows of offices (Class B1a)	Granted	May 23 2011

In determining the 2017 HVAC application (2017/6518/P), the planning officer noted objections from the owner of 19 Russell Chambers, who raised concerns about the separation distance between the proposed equipment and the potential for noise to be amplified by the lightwell. However, the officer considered that the location of the plant at lower ground level was acceptable given the conclusions of the submitted noise assessment and the application of appropriate conditions.

It is also noted that the withdrawn 2012 application (2012/2076/P), included a substantial extension to the rear part of the roof to provide additional office accommodation opening onto a south-west facing roof terrace surrounded by a glazed balustrade. The proposal effectively raised the height of the rear part of the building by approximately 3m. The application was not accompanied by a noise assessment or a heritage assessment. The current proposal is considered to be substantially different in character and impact than this earlier proposal.

Application Proposal

The application proposal is a key part of the refurbishment of the existing office building by the new operator, Runway East, to provide a new high quality and sustainable modern workspace. It would provide a modest and easily accessible area of open space, for users of the workspace to enjoy breaks and engage in meetings when the weather and seasons allow. As part of pre-application consultation with residents, they have also been offered access and use of the terrace during the times when it will be open.

The application is supported by the following documents:

- Application forms and completed certificate of ownership;
- Site Location Plan (drg ref: Site Location Plan RWE-INT-BLO-ZZ-DR-I-90-105-P00);

- Existing Elevations (drg ref: 01011P 'drg 5 of 12' Rev F0);
- Existing Elevations (drg ref: 01011P 'drg 9 of 12' Rev F0);
- Existing Roof Plan (drg ref: 01011P 'drg 7 of 12' Rev F1);
- Existing Sections (drg ref: 01011P 'drg 10 of 12' Rev F0);
- Existing Sections (drg ref: 01011P 'drg 11 of 12' Rev F0);
- Existing Sections (drg ref: 01011P 'drg 12 of 12' Rev F0);
- Proposed Roof Plan (drg ref: RWE-INT-BLO-04-DR-I-90-103.P00);
- Proposed Terrace North West-South East Elevation and Section AA (drg ref: B1927 000-0G.00);
- Proposed Terrace North East-South West Elevation and Section BB (drg ref: B1927 000-0G.00);
- Proposed Terrace North East Elevation and Section CC (drg ref: B1927 000-0G.00);
- Noise Assessment by 24 Acoustics; and
- Heritage Impact Assessment by HCUK.

As noted above, the existing flat roof extends to approximately 260sqm. However, the proposed terrace area extends over only part of this (approximately 160sqm), given a 2m set-back on all sides to reduce the impact of the terrace and screening around its edge. This is shown on the proposed drawings, an extract of which is shown in **image 7** below.



Image 7 – Proposed Plan Extract (drawing source: Interaction)

As shown on the north western section drawing (**image 8**), the terrace will be enclosed by wooden fencing to a height of 1.8m (6 feet) which provide both privacy screening and acoustic attenuation to limit noise from conversations being dispersed, thereby preventing any harmful impact on the amenity of existing surrounding neighbours. Consideration of this issues has been one of the key issues in preparing this application and during pre-application consultation with local residents. **Images 8 – 10** show that the roof terrace will be completely enclosed and will not enable any overlooking towards neighbours.

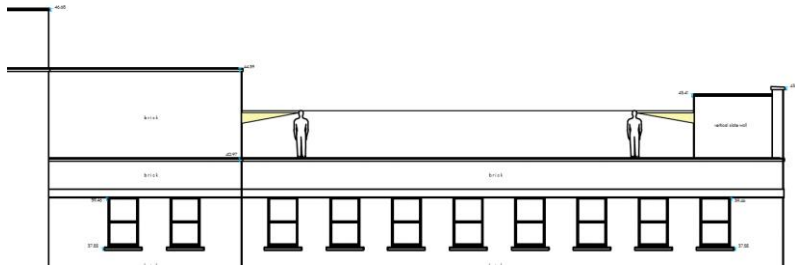


Image 8 – Proposed Drawing Extract showing the north-west elevation of the roof level (Interaction)

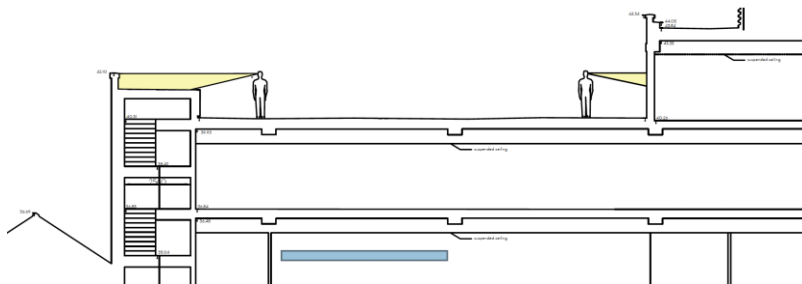


Image 9 - Proposed Drawing Extract showing section through the terrace from NW to SE (Interaction)



Image 10 - Proposed Drawing Extract showing section through the terrace from SE to NW (Interaction)

The proposed use will allow a small number of tables and chairs to be used for seating in small groups. Some incidental landscaping is anticipated to provide an attractive environment and divide space into more open and more private areas. The proposed terrace will be accessible only during office hours (09:00 to 17:00 Monday to Friday). However it will also remain accessible as the fire escape and emergency lighting will be retained for this purpose.

Pre-application consultation

The Applicant has undertaken two rounds of consultation with neighbours adjacent to the building via a mailshot, which identified a dedicated point of contact for feedback.

The first mailshot (dated 23rd August 2023) was sent to all residents of Russell Chambers, Pied Bull Court, 7-8 Bloomsbury Square, 'Whitehall' 9-11 Bloomsbury Square, 'Virginia House' 31 Bloomsbury Square and 5 Bloomsbury Square. The letter set out the details of the proposed terrace and then also confirmed the proposed measures to address any harm to residential amenity (by virtue of noise and overlooking).

A second round of consultation letters were sent out to the same local residents on 29th September which provided an update on the feedback to the initial consultation and also to inform residents that a drop-in session had been arranged on Thursday 9th November at 24-28 Bloomsbury Way.

A number of local residents from Russell Chambers attended this drop-in session. A presentation of the proposal was available to read and discuss which included an explanation of the proposed measures in place to address amenity and heritage issues as well as the proposed design and appearance of the terrace. A copy of the presentation boards are attached at **appendix 1**. Further, representatives from the applicant and consultant team were on hand to discuss the proposal.

One of the attendees from Russell Chambers included the occupier of the top floor apartment (no. 24) whose windows faced towards the existing roof terrace and would be most impacted by the proposal.

The general response from residents was that whilst they would prefer to not have a roof terrace serving the office next door to them, they understood the mitigation measures that were proposed to minimize its visual and amenity impact.

Given the potential impact on the occupier of Flat 24, a further site meeting took place on 20th November which included a site visit to the premises. A mockup of a 1.8 metre high screen was positioned on the roof terrace enabling a comparison between someone talking with and without the screen in-situ. The screen used for the test was not a fully compliant acoustic fence so any reduction in noise being carried from the roof terrace to the nearest windows would not be as great as the reduction in this noise transfer with a full acoustic fence in place. However this exercise did confirm that there would be noise reduction.

The test also confirmed that a 1.8m/ 6ft fence would screen those using the terrace but not adversely affect the existing outlook given that it would only screen the existing air handling/ ventilation equipment on the roof of 6-11 Bloomsbury Square, as shown in **image 11**.

Another outcome of the public consultation exercise was to provide contact details for the applicant in respect of residents making them aware of day to day operational issues of the office. For example, the applicants are now aware of the impact of automatic lighting (on automatic PIR sensors) being left on too long and causing lighting disturbance to neighbouring flats. These day-to-day management issues, whilst not part of the planning application, can now be discussed in a more positive way. Another issue not relating to this application that was raised arose from the testing of the air handling equipment newly installed in the lower ground floor basement. These units are the subjects of a separate planning application.

Overall, the public consultation exercise was positive in that it enabled residents and the applicant to meet, discuss and be aware of the issues relating to the operation of the existing office building. It also benefited the application for the roof terrace as it enabled the main issues to be discussed and ‘tested’ on site to fully understand their impact.



Image 11 – View from top floor flat (no. 24), Russell Chambers towards roof terrace – note 1.8m/ 6ft high dummy screen restricts views of person on roof but not of views beyond

Planning Policy and Assessment

This section assesses the proposal against the relevant national and local planning policy and guidance. The plan-led approach to development, as enshrined by Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to accord with the adopted Development Plan unless material considerations indicate otherwise.

The Development Plan for Camden Borough is principally formed by:

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

In physical terms, the proposals cover a relatively small area and are extremely limited in terms of the physical change to the site. They would involve new flooring, the introduction of composite wooden fencing at a height of 1.8m and the siting of moveable outdoor furniture.

However, the proposal would introduce a new use of the roofspace for those working within the refurbished offices. Access would also be provided for local residents as discussed with them during pre-application consultation. As a result, it is considered that the two principal issues relating to the

proposal are the potential impact on the amenity of existing neighbouring residents and occupiers and the potential impact on Heritage Assets (HA).

Impact on amenity of neighbouring occupiers

Paragraph 6.1 of the Local Plan (2017) introduces Policy A1 (Managing the Impact of Development) by noting that due to mixed and intensive uses within the area and the central location of the borough within the wider City, amenity is particularly important.

The Policy states that "the Council will seek to protect the quality of life of occupiers and neighbours." It then makes clear that the Council will "grant permission for development unless this causes unacceptable harm to amenity." The policy lists 'visual privacy' under part (e) and 'noise and vibration' under part (j) as potential issues.

Supporting paragraph 6.4 states that "A development's impact upon visual privacy, outlook and disturbance from artificial light can be influenced by its design and layout. These issues can affect the amenity of existing and future occupiers. The Council will expect that these elements are considered at the design stage of a scheme to prevent potential harmful effects of the development on occupiers and neighbours."

Paragraph 6.20 clarifies that "where uses sensitive to noise are proposed close to an existing source of noise or when development that is likely to generate noise is proposed, the Council will require an acoustic report to accompany the application."

Policy A4 (Noise and Vibration) states that "the Council will seek to ensure that noise and vibration is controlled and managed." It also states that "development should have regard to Camden's Noise and Vibration Thresholds." These are enclosed under Appendix 3 of the Local Plan.

The Policy then sets out two scenarios where permission will not be granted:

- a. development likely to generate unacceptable noise and vibration impacts; or
- b. development sensitive to noise in locations which experience high levels of noise unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

The final part of the policy states that the Council "will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity."

The accompanying Noise Assessment Report by 24 Acoustics was undertaken following site visits and environmental noise measurements made on site between 10th to 15th August 2023.

The Report highlights that the nearest residential properties are in the Russell Chambers building which share the lightwell with 24-28 Bloomsbury Way. These properties are located to the south-west of the site as shown on all proposed drawings.

Given that noise impact guidance typically focusses on mechanical noise, the Report clarifies that there is no published objective method of assessing the potential for noise impact from people using an external terrace. However, the Report sets out a methodology for assessment, which includes measuring existing ambient noise levels at site in a location consistent with the location of the nearest residential receptors and undertaking a comparison between the measurements and predicted noise levels as a result of people talking on the terrace.

The Assessment notes that the proposed roof terrace will only be accessible/operational between 0900 and 1700 Monday to Friday and indicates that within this time an increase of 2-3dB is likely to be the threshold of change and that this would not unacceptably impact on the amenity of neighbours. It also acknowledges that the proposals include provisions for a 1.8m acoustic screen and clarifies the required acoustic properties of the screen in terms of thickness and composition. A screen is proposed to provide this acoustic attenuation as well as reduce the impact of overlooking, whether that be perceived or actual. The details of this screen are shown on the drawings and these can be controlled by a planning condition. Alternatively, details or a sample can be provided during the course of this application.

The Report notes that the existing ambient or background noise levels at the site are dominated by existing services, plant and road noise. Measurements taken across the four day period were relatively consistent, varying between 52 and 53 dB at the nearest windows to the terrace.

The Assessment is undertaken on the basis of the maximum capacity of 48 people, with 50% of those people talking with raised voices at any one time, also accounting for the reduction in volume as noise travels the 15-20m distance from the terrace to the residential receptors.

The results shown within table 2 of the Report demonstrates that the increase in noise, from use of the proposed terrace during operating hours, would be less than 0.5 dBA at the nearest residential receptors. This is significantly below the 2-3dB threshold referenced above and is considered to be a negligible increase in noise level, and one that is unlikely to cause disturbance. These results were borne out by the on-site testing undertaken on the roof when assessed from the windows of Flat 24 Russell Chambers as part of the pre-application consultation exercise as the reduction in sound of a voice was reduced by even the most basic screen.

The Report also specifies two further precautionary mitigation measures to ensure that other potential noise sources do not impact on neighbours, which are that tables and chairs are fitted with rubber or plastic feet and that any background music is played at no higher than speech level. There is no intention to play music on the terrace.

In terms of visual privacy, as noted in earlier in this statement, and shown within **images 5 to 7**, the proposed terrace would be enclosed on all sides by either existing built form, or a 1.8m fence which would prevent any opportunities for overlooking and would therefore have no adverse impact on the privacy of existing residents. Further, the height of the proposed terrace was replicated for residents as part of the pre-application consultation and was confirmed as not having any adverse visual impact

from the flats that have a view towards the roof but would also effectively screen anyone standing on it (as shown in **image 11**).

On this basis, the proposal is considered to meet the requirements of Camden Local Plan Policies A1 (in particular part (e) on visual privacy and part (j) on noise and vibration), together with the requirements of Policy A4, which specifically covers noise impact.

Heritage Impact

The latest version of the NPPF (2023) considers proposals affecting nationally significant heritage assets. NPPF paragraph 194 states that LPAs should *“require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting”*. Paragraph 195 covers the LPA’s role in assessing significance and impacts. Paragraph 199 is clear that when considering impacts on significance of an asset *“great weight should be given to the asset’s conservation”* with greater weight given the more important the asset.

Paragraph 200 requires that any harm to or loss of significance of an asset should require *“clear and convincing justification.”* Paragraphs 200 to 203 provide two tests depending on whether there is *“substantial harm to or loss of”* the asset, or *“less than substantial harm”* to the asset.

In the former case, the Framework directs that consent should be refused unless harm is necessary to achieve substantial public benefits that outweigh the harm or loss. In the latter case, harm should be weighed against public benefit.

Paragraph 7.41 of the Local Plan introduces the Council’s heritage policy. It states that *“The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas.”*

The same paragraph references the NPPF’s requirement that in decision making local authorities should give great weight to conservation of designated heritage assets in a manner appropriate to their significance.

Local Plan Policy D2 (Heritage) sets expectations for development affecting designated heritage assets, conservation areas, archaeology, and non-designated assets. The Policy echoes the NPPF, in that impacts are weighed against the public benefits.

London Plan Policy HC1 (Heritage Conservation and Growth) states that *“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.”* The policy also specifies that cumulative impacts as a result of incremental change should also be actively managed.

The accompanying Heritage Impact Assessment by HCUK, acknowledges the context of the application site, which includes Bloomsbury Conservation Area, Bloomsbury Square Registered Park and Garden, various listed buildings on Bloomsbury Square and Bloomsbury Way and the grade I listed Church of St George, before undertaking an appraisal of the impacts of the proposed works and use on the significance of these assets.

- *Bloomsbury Conservation Area* – The proposed terrace would not be prominent or dominant within the conservation area and would not cause any erosion in the designation’s heritage value, which relates to the formally planned arrangement of streets, contrasting leafy squares, together with the area’s morphology and high quality 17th to 19th C built form.
- *Bloomsbury Square Registered Park and Garden* – The proposal would not result in any physical effect on the Bloomsbury Square Registered Park and Garden meaning that the heritage values of this asset embodied within its fabric would be entirely preserved. Key views would be unaltered. There would be no effect on the asset’s significance or the ability to appreciate its significance.
- *Listed Buildings to the east / on the west side of Bloomsbury Square* – The significance of the buildings are best appreciated from the front and the proposal would not alter these views. While the proposed terrace would be visible from the rear windows of these buildings, these are not designed views and already feature modern interventions within the tight-knit urban form. Similarly, the introduction of activity would be in keeping with the busy urban area and would not erode heritage value of the buildings. There would be no effect on the significance of these assets.
- *Church of St George (grade I)* – The building is located c.75m north-west of the application site, though there is no intervisibility between the buildings. The proposed changes to the roof would therefore not result in any visual or experiential change to the setting of the Church of St George. Key views of the Church from Bloomsbury Way would be unaffected. Overall there would be no perceptible change to the significance or setting of the Grade I Listed building.

It concludes that while there would be some change within Conservation Area and setting of other heritage assets as a result of the proposed works, due to their modest scale, concealed nature and high quality materials, the application proposal would preserve the significance of the surrounding assets. The lack of visibility of the existing roof and terrace is demonstrated in the Heritage Statement but also from the on-site replica of a 1.8m/ 6 foot high screen photographed during the pre-application consultation site meeting (**image 11**) and in the photographs below at **images 12 & 13**.

This lack of visibility from within the CA confirms that the use of the roof as a terrace for office workers and the erection of a privacy screen around the roof, set back from its edge, will not have any harmful impact on the character or appearance of the CA.



Image 12 – View towards roof and terrace from Bloomsbury Square Garden (note roof not visible)



Image 13 – View towards roof and terrace from Pied Bull Court (note roof not visible)

The Assessment therefore is considered to be proportionate and compliant with relevant policies contained within Section 16 of the NPPF and relevant local planning policy and guidance, including Local Plan Policy D2 and London Plan Policy HC1. This is sufficient to ensure that there would be preservation for the purpose of the decision maker's duty under Sections 66 and 72 of the Planning (Listed Building and Conservation Area) Act 1990.

Notwithstanding the above position, any limited harm to the significance of assets perceived by the LPA would fall far below the threshold of substantial harm, and the proposed benefits derived through the provision of high quality modern workspace, facilitated by the provision of open space, therefore

improving the office stock in a highly accessible location, are considered to outweigh such harm. The proposal would therefore meet the NPPF and development plan tests in this regard.

Conclusion

On this basis, the proposal is considered to meet the relevant planning policy requirements in terms of neighbour amenity and heritage impact, while also facilitating the wider refurbishment of the building and improvement of office stock within Central London.

Formal pre application consultation was undertaken with local residents which confirmed how the proposed mitigation to address these main issues will successfully ensure that there is no adverse impact on residential amenity and also no harm caused to the Conservation Area or nearby heritage assets.

For these reasons, in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposal accords with the Development Plan and there are no material considerations that indicate anything other than that planning permission for the development should be granted.

If you wish to discuss any issues raised herein, please do not hesitate to contact Stuart Rackham (07841 674794/ stuart@rackhamplanning.co.uk).

Yours faithfully



Rackham Planning Limited

Enc. As Above

CC: Runway East; Interaction; 24 Acoustics; Heritage Collective