

50 – 51 RUSSELL SQUARE, LONDON, WC1B 4JP

PLANNING STATEMENT



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1. INTRODUCTION AND SUMMARY

- 1.1 50-51 Russell Square is a 1960's office building on the corner of Russell Square and Bedford Place. It is owned by the Bedford Estates and occupied by Associated British Foods (ABF) as the head office.
- 1.2 The building is tired and in need of a major refurbishment. The principal purpose of the scheme is to provide continuing accommodation for ABF so that they can expand and remain in Russell Square as their international headquarters. This submission is made with their support. They would move to temporary accommodation during the works.
- 1.3 The building will be rejuvenated by:
 - Retention of the existing structure but reclad to transform its external appearance.
 - Provision of improved and additional office accommodation. The existing GIA floorspace is 1,769 sqm, proposed is 2,168 sqm resulting in an increase of 399 sqm.
 - Improvement of the thermal performance by attaining BREEAM 'Excellent' standard, a 29.
 - A car free scheme and greatly improved cycle parking.
- 1.4 As a result the life span of the building will be extended.
- 1.5 The application is the outcome of extensive pre-application discussions with planning and conservation officers of Camden Council.

2. THE EXISTING BUILDING AND BACKGROUND TO THE PROPOSED SCHEME

- 2.1 50-51 Russell Square is a 1960's office building of 1,796 sqm with lower ground, ground and five upper floors situated as a bookend to Russell Square and Bedford Place. The top floor height from street level is 15.5 m. It is owned by the Bedford Estates and occupied by Associated British Foods (ABF) as the head office.
- 2.2 However the building is tired and in need of a major refurbishment. Accordingly, major refurbishment is necessary and a comprehensive scheme is proposed which will extend the life span of the building.
- 2.3 The surrounding area is mixed of uses with hotels, offices, shops and residential all located around Russell Square.
- 2.4 The Bloomsbury Conservation Area Appraisal and Management Strategy identifies the building as being a negative detractor to the character and appearance of the conservation area. It is noted as a building with neutral impact on the Bloomsbury CA Sub Area 6 Townscape Appraisal.
- 2.5 As denoted by the plaque, located on the facade, the site was occupied by Georgian terraced housing from 1800-1962 and lived in by Lord Denman, the Lord Chief of Justice (1816-1834) and his son Rt Hon George Denham, a Judge of the High Court who was born there in 1819. The original house was demolished in 1962.
- 2.6 In 1963 planning permission was granted for:

'Erection of a building of basement, ground and five storeys over for use as offices with a residential flat on the top floor.'

The top floor has no independent access and has long been subsumed into the office use of the whole building.

- 2.7 In 2006 planning permission was granted to construct a ramp along the Russell Square elevation to provide wheelchair access to the building.

- 2.8 The building exterior is structured around four central columns with wide bay ground floor fenestration and dark stone cladding. The principal elevation facing Russell Square, as well as the rear, is composed of metal clad concrete columns and mosaic banding from first to fourth floors while the flank elevation of Bedford Place is characterised by a dark brick shear wall, with one bay of windows. Metal framed windows are featured throughout the facades.
- 2.9 The fifth floor is constructed in brick to match the flank and set back from the main elevations. Access is via steps from Russell Square and a ramp running perpendicular to the primary façade.
- 2.10 The existing building is not statutorily listed although it is surrounded by a number of statutorily listed buildings. Most notably are the Grade II listed terraced housing (44-49 Russell Square and 52-60 Russell Square & attached railings) and Grade II listed terraces 1-20 and 21-40, & attached railings on Bedford Place. Opposite is a Grade II listed statue of Francis Russell the 5th Duke of Bedford, which sits within the Grade II listed Russell Square Park & Garden.
- 2.11 Pre-application advice has been sought from Camden Council on the proposed scheme. The design development process has involved an introductory meeting and four design and conservation workshops since April 2023.
- 2.12 A Planning Performance Agreement (PPA) has also been agreed with Camden Council. This covers the pre-application planning process and planning application process (with scope to continue through to the post-approval process, if required).

3. THE PLANNING APPLICATION

3.1 On behalf of Bedford Estates, freeholder of the building, planning permission is sought for:

‘New façade treatment to main building; enlarged roof extension, reopening of lightwell to front; demolition of two storey outrigger and replacement with three storey plus plant enclosure, single storey infill extension to existing car park, erection of full height stair core extension to rear and reconfiguration of entrance steps and ramp.’

3.2 The application comprises:

- Completed Application Form by Savills
- Cover Letter by Savills
- Location / Site plan at 1:1250 scale
- Existing and Proposed floor plans, roof plan, elevation drawings and section drawings by Garnett Architecture
- Demolition drawings by Garnett Architecture
- Planning Statement by Savills
- Design and Access Statement by Garnett Architecture
- Heritage Appraisal by The Heritage Practice
- Daylight and Sunlight Assessment by Delva Patman Redler
- Transport Assessment by TTP Consulting
- Draft Deliveries and Servicing Plan by TTP Consulting
- Draft Travel Plan by TTP Consulting
- Construction/Demolition Management Plan pro forma
- Fire Strategy by Semper
- Structural Statement by MNP
- Energy and Sustainability Statement by TPS
- Basic Air Quality Impact assessment
- Noise Impact Assessment by Venta Acoustics

3.4 Existing floorspace (GIA) is 1,769 sqm, proposed is 2,168 sqm. The increase is therefore 399 sqm.

3.5 There is also an existing UKPN substation of 23 sqm, this will be replaced with a floorspace of 19 sqm.

4. PLANNING POLICY CONTEXT

4.1 The planning policy context is set out in a number of documents:

- National Planning Policy Framework 2023
- The London Plan 2021
- Camden Local Plan 2017. The relevant policies are:

G1 Delivery and location of growth

H2 Maximising the supply of self-contained housing from mixed-use schemes

E1 Economic development

E2 Employment sites and premises

C6 Access for all

A1 Managing the impact of development

A3 Biodiversity

A4 Noise and vibration

A5 Basements

D1 Design

D2 Heritage

CC1 Climate change mitigation

CC2 Adapting to climate change

CC3 Water and flooding

CC4 Air quality

CC5 Waste

T1 Prioritising walking, cycling and public transport

T2 Parking and car-free development

T4 Sustainable movement of goods and materials

DM1 Delivery and monitoring

- Camden Planning Guidance

Amenity (2021)

Design (2021)

Employment sites and business premises (2021)

Developer Contributions (2019)

Energy efficiency and adaptation (2021)

Housing (2021)

Transport (2021)

Water and flooding (2019)

- Bloomsbury Conservation Area Appraisal and Management Strategy

5. PLANNING ASSESSMENT

A. EMPLOYMENT

- 5.1 Existing floorspace (GIA) is 1,769 sqm, proposed is 2,168 sqm. The increase is therefore 399 sqm. Based on the current layout and operation, there are currently approximately 130 full time equivalent positions (120 full time and 30 part time) and predicted employees. Based on the accepted ratio (1:10 sqm) there will be approximately 175 full time equivalent positions (155 full time and 40 part time).
- 5.2 Policy E1 of the Camden Local Plan (CLP) generally supports economic development. Policy E2 seeks to ensure that the level of employment floorspace is increased or at least maintained and the redevelopment retains existing businesses on the site as far as possible.
- 5.3 The building is tired and in need of a major refurbishment. Improved and increased office space will be provided which will enable the existing long standing occupier, Associated British Foods (ABF), to expand and remain in Russell Square as their international headquarters. This submission is made with their active support. They would move to temporary accommodation during the works.
- 5.4 The Council's pre-application advice is that:

'Officers are supportive of the increase in office floorspace, especially as it would allow an existing business to remain in the Borough. Given the uplift is relatively low (411 sqm), there is no policy requirement to provide affordable workspace (triggered by an uplift of 1,000 sqm or more). As the building is being designed for an existing occupier, designing in floorspace suitable for SMEs is not a requirement.'

- 5.5 On this basis, the scheme complies with Camden Local Plan Policies E1 'Economic development' and E2 'Employment sites and premises' and Camden Planning Guidance 'Employment sites and business premises (2021)'.

B. HOUSING

- 5.6 Policy H2 seeks developments of more than 200 sqm in the Central London Area to provide 50% of additional floorspace as self-contained housing. In this instance the floorspace uplift is modest, 399 sqm, and the additional floorspace is sought to enable the expansion of a long-standing existing occupier who would return to the site following the works.

5.7 The pre-application advice recognised that:

‘There is a limit on the amount of additional floorspace via extensions to the building that can be provided due to the sensitive heritage context. Furthermore, the proposed uplift is 411 sqm (sic) which equates to a capacity for only 2 residential units (based on the CLP’s notion that 1 unit = 100 sqm). In this situation officers are happy for the applicant to explore housing provision on an alternative site in the local area or a payment in lieu.’

5.8 Compliance with Policy H2 ‘Maximising the supply of self-contained housing from mixed-use schemes’ and Camden Planning Guidance ‘Housing (2021)’ will therefore be either by a payment in lieu or off site residential provision.

C. DESIGN AND CONSERVATION

5.9 The Design and Access Statement and the Heritage Appraisal describe the history of the building, the location and surrounding area. The Bloomsbury Conservation Area Appraisal and Management Strategy identifies the building as being a negative detractor to the character and appearance of the conservation area.

5.10 The Design and Access Statement:

- Analyses the existing building and streetscape, opportunities and constraints.
- Describes the pre-application workshops with the planning and conservation officers of Camden Council and how the scheme has evolved.
- Sets out the design strategy, proposed massing, streetscape profile, façade articulation, vertical hierarchy, panelisation, weathering details, roof extension, ground floor plinth, weathering details, flanks façade, link extension, rear façade, materials palette and lighting strategy.
- Includes visualisations from key vantage points in Russell Square and Bedford Place.

5.11 It concludes:

“The most recent Bloomsbury Conservation Area Appraisal notes that the existing 1960s building detracts from the character and appearance of the Conservation Area. While there may be some positive aspects to the existing building, its horizontal façade treatment lacks the ‘vertical grain’ and facade hierarchy of neighbouring heritage assets on Russell Square and Bedford Place and contrasts harshly with the surrounding townscape, and overall, its contribution to the Conservation Area setting is neutral at best.

The proposal rejuvenates the end-of-terrace site in a manner sympathetic to its context, re-establishing the building as a ‘bookend’ in positive architectural dialogue with its neighbouring heritage assets. By removing the existing facades and rebuilding off the existing structural frame, the design will not only deliver an environmentally sustainable building through retention of embodied carbon, but also enhance the streetscape and improve the Conservation Area.

The North facade is to be clad in profiled GRC elements, tonally evoking the terracotta detailing which is characteristic of Russell Square. The scheme utilises the existing structural frame internally to form the facade treatment overall, while the detailing provides hierarchy and articulation as a continuation of the neighbouring ‘vertical grain’. The proposed roof design responds in contrasting ways to the townscape setting with a lightweight, metal-clad elevation utilising a traditional ‘dormer’ rhythm facing Russell Square and a brick flank on Bedford Place, reminiscent of a traditional end-of-terrace chimney stack.

The link block along Bedford Place is setback to align with the existing building line, and subservient in scale and detail to the main East flank and neighbouring terrace. The addition of one storey within the low infill creates an ordered and proportioned elevation with no material impact on neighbouring amenity. The design of this and the rear facade responds to the varying setting with Georgian inspired ‘windows in openings’, which is cohesive and sympathetic to Montague Gardens and Bedford Place Georgian terraces.

The proposal has been developed closely with LB of Camden’s Design and Conservation teams, across an introductory meeting and 4no. workshops, and successfully resolves many complex design challenges. The resulting proposal demonstrates design excellence involving utmost sensitivity to its heritage context as well as the best possible energy and sustainability performance including a high retention of embodied carbon.”

5.12 The Heritage Appraisal considers the impact of each element of the proposed scheme upon the host building, the character and appearance of the Bloomsbury Conservation Area and the setting of the surrounding listed buildings.

5.13 It concludes on the principle of the development that:

‘The proposals retain key elements of the architectural character of the existing building and the features which distinguish it from its neighbours, including the consistent floor to ceiling heights and the sense of bands of fenestration. However, this has been overlaid and refined to reflect features from the surrounding late Georgian townhouses in terms of the tone and colour of the material palette and the form, profile and articulation of the roof storey, providing for a less stark contrast with its neighbours.’

5.14 In terms of the rear element which faces Bedford Place, this is:

‘considered of an appropriate scale and massing and will retain the current heavily setback building line. This will ensure that it reads as a subordinate element within the streetscene. Significant enhancements will be secured to this area of the site as a result of improvements to the ground floor frontage and the replacement of the current hostile and unattractive vehicular entrance to the rear parking area.’

5.15 In terms of the proposed roof addition this:

‘has a similar visual relationship with the lower storeys as the existing building, appearing subordinate, ancillary and recessive in character. Mansards and heavily articulated roofscapes are a feature of this part of Russell Square and a visible uppermost storey is considered to be in keeping with the general pattern of surrounding development. Additional volume has been incorporated adjacent to the flank elevation of the building but this has been modelled in brickwork to refer to the prominent slab chimneystacks on surrounding buildings and to visually contain the remodelled roof storey.’

5.16 On this basis, the proposed scheme will preserve and enhance the character and appearance of the Bloomsbury Conservation Area, and the setting of surrounding listed buildings, in line with national advice and Policies D1 ‘Design’ and D2 ‘Heritage’ together with the Bloomsbury Conservation Area Appraisal and Management Guidelines.

D. AMENITY

Daylight and Sunlight

5.17 Investigations have revealed that there are two residential units in the lower ground floor of 19 and 20 Bedford Place.

5.18 The Daylight Assessment by Delva Patman Redler concludes:

‘We ran our assessments using methodologies recommended in the BRE guide. All windows and rooms considered for daylight and sunlight comfortably meet the BRE guidelines’

5.19 On this basis the scheme complies with Policy A1 ‘Managing the impact of development’ of the Local Plan and Camden Planning Guidance ‘Amenity’.

Re-opening of the Front Lightwell

5.20 The Structural Note by MNP explains that the re-opening of the front lightwell will reinstate the open area lost during the 1960’s redevelopment of the site. The work will involve the removal of the existing “lid” to the basement, which extends to the back of the highway. The existing perimeter wall of the basement will remain in place, with a new capping beam formed to stiffen the top edge and a prop provided from the main ground floor slab.

5.21 At basement level the existing slab is to be locally broken out and adjusted to accommodate new external finishes and provide a thermal break. This will involve a nominal removal of the existing material and will not require any significant excavation. At the base of the perimeter wall a section of slab will remain in place to provide continuity of restraint.

5.22 On the basis of these limited works a Basement Impact Assessment is not required in accordance with Policy A5 ‘Basements’.

Noise Impact Assessment

5.23 A baseline noise survey has been undertaken by Venta Acoustics to establish the background noise climate. The most affected noise sensitive receivers are expected to be residential units in 20 Bedford Place opposite and the upper floor offices at 21 Bedford Place. This has enabled noise emission limits to be set at the most affected noise sensitive receivers.

5.24 The proposed plant is:

Plant Item	Quantity	Proposed Model	Notes
Condenser	1	Daikin REYQ8U	Located on second floor roof
Condensers	3	Daikin REYQ12U	
Condensers	2	Daikin REYQ16U	
Condenser	1	Daikin REYQ20U	
Condenser	2	Daikin 3MXM52A	
MVHR	1	Daikin VAM 1000	Located on main roof
Toilet Extract	1	Nuaire AV54	
Internal MVHRs	5	Daikin Modular Size 5	One per floor, located internally

5.25 The cumulative noise emission levels from the proposed plant have been assessed to be compliant with the plant noise emission limits, with necessary mitigation measures specified. The Noise Impact Assessment concludes:

“The proposed scheme is not expected to have a significant adverse noise impact and the relevant plant noise requirements have been shown to be met.”

5.26 On this basis the scheme complies with Policy A4 ‘Noise and Vibration’.

Air Quality

5.27 An Air Quality Assessment will be submitted to demonstrate that there will be a neutral impact in compliance with Policy CCC4 ‘Air quality’.

Waste

5.28 The existing waste receptables are two 1100L and two 240L bins.

5.29 Refuse and recycling storage will be provided within a designated waste store located at basement level.

- 5.30 Camden Design Guide under Section 8, Paragraph 5.17 states “*There is no accurate guidance for the measurement of business waste as a conversion to square metres of floor space.*” The proposed provision is based upon principles adopted in neighbouring boroughs. i.e. 2,000L waste storage per 1,000 sqm GIA with daily collections.

Paper & Card (40%)	1735L (weekly) 347L (daily)	1 x 360L
Dry Mixed Recyclables (20%)	870L (weekly) 174L (daily)	1 x 240L
Food Waste (10%)	435L (weekly) 87L (daily)	1 x 120L
General Waste (30%)	1300L (weekly) 260L (daily)	1 x 240L 1 x 120L

- 5.31 Waste collections will be arranged and managed by a private waste collection company, with waste collection vehicles stopping on-street on Bedford Place.
- 5.32 On this basis the scheme complies with Policy CCC5 and Camden Planning Guidance ‘Design’.

Access

- 5.33 Access arrangements will be improved albeit constrained by the existing structure:
- The entrance from Russell Square will be moved to the centre of the principal facade, with a stepped and ramp arrangement to deliver a similar approach for all users.
 - The existing lift shaft will be increased in size to accommodate a new wheelchair accessible passenger lift and extended to the fifth floor level. This will provide level access to the basement and upper floors.
 - A wheelchair accessible WC will be provided near the reception at ground floor along with a wheelchair accessible shower and WC within the lower ground level.

5.34 On this basis the scheme complies with Policy C6 'Access for All'.

E. ENERGY AND SUSTAINABILITY

5.35 The Energy and Sustainability Statement by TPS summarises the proposed energy and sustainability measures:

- Excellent building fabric values, as per Building Regulation Part L 2021 standards, therefore substantially reducing the buildings heat losses, compared to the existing fabric
- New mechanical ventilation with heat recovery throughout, thereby substantially reducing the building's heat losses compared to the existing fabric. Heat generation will be non-carbon and will rely on air-source heat pumps.
- Natural day lighting will improve occupancy comfort and reduce the requirement for lighting.
- Lower energy lighting.
- Improved air tightness of the building to reduce air permeability below 8m²/hr/m³. This will be met through improved fabric detailing and draught proofing.
- Use of sustainably and locally sourced materials where possible.
- Reuse of materials will be reused where possible to reduce the embodied carbon footprint.
- Recycling facilities on site for construction and operational waste.
- Minimisation of water use by meters, water efficient taps, shower heads, dual flush toilets and low water use appliances.
- A Site Waste Management Plan (SWMP).
- Green Roof and planter comprising first floor planter (4.44 sqm), third floor substrate sedum roof (42.24 sqm), sixth floor roof substrate sedum roof (72.47 sqm).

- An all electric scheme.

5.36 The report by TPS assesses the scheme in detail and concludes that:

‘The proposed energy efficient systems and passive design features resulted in the whole building achieving a 66.96% improvement in carbon saving against the existing condition, when compared against the Building Regulations Part L2 2021 notional figures and other local and national technical guidance has been reviewed to ensure the project has energy efficiency, future proofing and biodiversity at its heart. A reduction of 22.49% has been achieved at the Be Green stage through the implementation of on-site renewables which include air source heat pumps and photovoltaics.

5.37 According to Paragraph 8.11 of the Local Plan, developments of more than 500 sqm GIA must demonstrate a 20% ‘Be Green’ stage carbon dioxide reduction from renewables. Whilst the increase of 399 sqm is below this threshold, there will be a reduction of 22.49% so exceeding the target.

5.38 It is expected to be awarded an ‘Excellent’ BREEAM rating.

5.39 The existing building makes no green contribution. The proposed combination of planter and green roofs with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) meeting the requirements of GRO Code 2014 and planters will increase the Urban Greening Factor from 0.00 to 0.13.

5.40 The site is not within a Flood Risk Zone and no basement excavation is required.

5.41 On this basis the scheme meets Policies A5 ‘Biodiversity’, CCC1 ‘Climate change mitigation’, CCC2 ‘Adapting to climate change’ and CCC3 ‘Water and flooding’ of the Local Plan and Camden Planning Guidance ‘Energy efficiency and adaptation’.

F. CYCLE PARKING, TRANSPORT, DELIVERIES AND SERVICING, CONSTRUCTION MANAGEMENT PLAN, FIRE STRATEGY

Car / Cycle Parking

5.42 The existing five or so car parking spaces will not be re-provided.

5.43 Currently there are six semi-vertical cycle racks under cover of the side extension.

- 5.44 A total of 37 cycle racks and lockers are proposed with to accommodate a range of abilities, Eight Sheffield stand spaces (including two adaptable) are placed near the Bedford Place entrance for accessible users and short-stay visitors. The cycle stands are uncovered, matching those opposite at 18 Bedford Place and appropriate in the conservation area. The lower ground cycle storerooms, accessed via the external lightwell stair, will provide 19 semi-vertical and 10 two-tier cycle rack spaces. Due to the limitations of existing heights, semi vertical are needed to meet the number of cycle spaces required. A 2x2m cycle lift is not feasible due to the structural constraints.
- 5.45 On this basis the scheme meets Policies T1 'Prioritising walking, cycling and public transport' and T2 'Parking and car-free development'.

Transport Assessment

- 5.46 The Transport Assessment by TTP Consulting sets out the current situation:

"Access is located at the western extent of the Russell Square frontage via steps and a ramp that runs perpendicular to the primary facade. A car parking area is located to the rear of the building, part of which is located beneath a two storey outrigger that faces onto Bedford Place.

The car park has five marked parking bays and it is understood that these are not generally used. Access to the parking area is taken from Bedford Place, the location of parking beneath the outrigger means that vehicles higher than 2.2 metres cannot enter the site. A semi vertical cycle stand that provides capacity to park 6 bicycles is located within one of the car parking spaces. Refuse is also stored in this area and is collected by a vehicle stopping on street."

- 5.47 The main pedestrian access from Russell Square will be moved to a more central position with steps and a ramp provided similar to the existing arrangement. The infill extension results in the removal of on site car parking and so the existing vehicle crossover on Bedford Place will be closed and reinstated as footway. It is envisaged that the scope of the highway works would be agreed by way of a Section 278 agreement.

- 5.48 Table 4.1 of the Assessment shows that the proposed development is expected to generate an additional 12 person trips during the morning peak hour (8am – 9am) and an additional 11 person trips in the evening peak hour (5pm – 6pm). Of these, it's expected to result in an additional 10 trips by public transport in the busiest one-hour period. This level of increase is not expected to have a noticeable impact on the operation of the local transport network given the wide range of services operating in the area.
- 5.49 Deliveries to the office would mainly comprise post, stationery, food and drink and courier deliveries. Based on the TRICS database, offices typically generate 0.39 deliveries per 100 sqm of floor space. Therefore, based on the uplift of 399 sqm of office floor space, the proposed development is expected to generate an additional 1 – 2 deliveries per day. Of these deliveries, the vast majority of deliveries would be carried out by Light Goods Vehicle (LGV 3.5t), many of which are already operating in the area, whilst deliveries by Heavy Goods Vehicles (HGV, over 3.5t) would be infrequent, such as waste collection vehicles.
- 5.50 All delivery and servicing activity would take place on-street, with yellow lines on Bedford Place providing opportunity for vehicles to stop. It is considered that vehicles delivering to the existing building would have stopped in the same location.

Travel Plan

- 5.51 The site is within a short walking distance of a wide range of public transport, local facilities and amenities. The site has a PTAL level of 6b, demonstrating that it has an 'excellent' level of accessibility to public transport. It's also close to a number of Transport for London (TfL) cycle routes and Santander cycle docking stations.
- 5.52 The Travel Plan by TTP Consulting explains that:

"The main aim of this Travel Plan is to put in place the management tools deemed necessary to enable future employees to make more informed decisions about their travel, which at the same time minimises adverse impacts on the environment. This Travel Plan further aims to promote sustainable transport to improve the health of employees and improve productivity, as well as decreasing the economic costs associated with travelling to work. This is achieved by setting out a strategy for eliminating the barriers keeping employees from sustainable modes and in particular active modes of travel such as walking and cycling."

- 5.53 The actions are:

- A Travel Plan Coordinator will be appointed at least one month prior to the occupation of the building.

- Employees will be provided with a Travel Pack prior to occupation, which will describe the accessibility of the building.
- A baseline travel survey will be undertaken 3 months from occupation of the building or once 75% of the floor space is occupied, whichever comes first.
- Travel surveys will also take place one, three and five years after the baseline (Year 0) travel survey.

5.54 On this basis the scheme meets Policy T4 ‘Sustainable movement of goods and materials’.

Draft Delivery and Servicing Plan

5.55 As there will be no vehicular access to the site, all delivery and servicing activity would take place on-street, with yellow lines on Bedford Place providing opportunity for vehicles to stop. Vehicles delivering to the existing building probably stop similarly.

5.56 The Draft Delivery and Servicing Plan by TTP Consulting explains that:

“Deliveries to the office would mainly comprise post, stationery, food and drink and courier deliveries. Based on the TRICS database, offices typically generate 0.39 deliveries per 100 sqm of floorspace. Therefore, based on the uplift of 448 sqm of office floor space, the proposed development is expected to generate an additional 1 – 2 deliveries per day. The additional number of deliveries is negligible and would not have a noticeable impact on the local road network.

Of these deliveries, the vast majority of deliveries would be carried out by Light Goods Vehicle (LGV 3.5t), many of which are already operating in the area, whilst deliveries by Heavy Goods Vehicles (HGV, over 3.5t) would be infrequent, such as waste collection vehicles.”

5.57 The proposed measures are:

- *“Implement a booking system to help manage deliveries away from peak hours to minimise congestion;*
- *Record a delivery log to determine whether any suppliers can be consolidated to reduce the number of vehicles. Consider doing so between both units for stationery, catering, waste collection etc;*

- *Encourage staff/management to use delivery companies who can demonstrate their commitment to best practice – for example, the Freight Operator Recognition Scheme (FORS) will be selected;*
- *Staff instructed to use ‘click and collect’ and utilise pick-up points rather than having personal deliveries made to the site;*
- *Staff/management will be encouraged to use sustainable suppliers that use alternative modes of transport for freight, such as cargo bikes or electric vehicles;*
- *Deliveries will be scheduled as far as possible so as to avoid coinciding with waste/recycling collections; and*
- *Drivers will be advised that the vehicle engines must be switched off whilst goods are being loaded/unloaded (i.e., when their vehicle is stationary).”*

5.58 On this basis the scheme meets Policy T4 ‘Sustainable movement of goods and materials’ and DM1 Delivery and monitoring’.

Construction/Demolition Management Plan pro forma (CMP)

5.59 The completed Construction/Demolition Management Plan pro forma (CMP) is submitted. This sets out the measures to minimise construction impacts in accordance with the best practice guidelines as described in the Construction Logistics and Community Safety (CLOCS) Standard and the Guide for Contractors Working in Camden.

Fire Strategy

5.60 Although the height of 15.5m is less than the 17m threshold, a Fire Strategy by Semper is provided.