



JANUARY 2024

# Planning Statement

15-17 Goodge Street, London W1T 2PQ

Iceni Projects Limited on behalf of  
The Executors of the Brenda  
Fenton Estate  
January 2024

ICENI PROJECTS LIMITED  
ON BEHALF OF THE  
EXECUTORS OF THE  
BRENDA FENTON ESTATE

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Planning Statement  
15-17 GOODGE STREET, LONDON W1T 2PQ



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# 1. INTRODUCTION

1.1 This Planning Statement has been prepared by Iceni Projects Limited ('Iceni') on behalf of *Alexandra Fenton Executor of the Estate of Brenda D. Meynell Fenton* ("the Applicant") in support of a planning application for full planning permission for development at 15-17 Goodge Street, London W1T 2PQ ('the Site').

1.2 This application seeks full planning permission for the following description of development:

Replacement of the existing fourth floor mansard roof structure with a new single-storey extension to accommodate additional commercial floorspace (Class E) with a roof level terrace above, alterations to the ground floor entrance, external improvements to the Goodge Street and Whitfield Street facades including replacement windows, provision of replacement plant and machinery at roof level, and other associated works.

1.3 The Applicant's objectives for the proposal are to reposition the asset and optimise its employment floorspace potential as a prime commercial building within a highly accessible central location. This would be achieved by the delivery of a sensitive roof level extension, as well as a series of sensitive interventions and enhancements to improve the energy efficiency, and external and internal quality of the building.

1.4 The design approach for the Site has been guided by pre-application discussions with planning and design officers at Camden Council. These discussions saw the Council expressing in principle support for the proposals, noting that the works are considered to be of a high quality and designed sensitively and thus acceptable from a planning, design, and conservation standpoint.

1.5 The purpose of this Planning Statement is to provide the London Borough of Camden ('the Council') with an overall summary of the existing site and surroundings; the relevant planning history for the site and to provide justification for the Proposed Development in the context of Camden's Development Plan and national planning policies. Furthermore, this Planning Statement demonstrates that the scheme detailed in this planning application offers several unique benefits including:

- The scheme is fully aligned with the Economic, Social and Environmental pillars of the NPPF.

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- Taking a retrofit approach through retaining, extending and optimising the existing building to enhance its employment generating capacity as a prime commercial asset within a city centre location.
  - Appropriately responding to the massing and built form of the Site and its immediate context.
  - Improve the efficiency and legibility of the existing building entrance such that it presents a more active and permeable relationship with the street scene.
  - Improving the quality of the commercial floorspace at ground and basement levels.
  - Enhancing the visual quality of the building's primary façade to Goodge Street and Whitfield Street.
  - Maintain the existing levels of amenity enjoyed by neighbouring properties in relation to daylight and sunlight, overlooking and privacy, and noise.
  - Improving the amenity and staff wellness of future occupants of the Site through the provision of a roof level amenity spaces, provision of end of journey facilities, and enhancing the daylight and natural ventilation levels within the commercial floorplates.
  - Improve the energy and resource efficiency of the building.

### Submission Documents

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- 1.6 In addition to this Planning Statement and Application Form prepared by Iceni Projects as part of the planning application, the following documents and drawings have been prepared and submitted in support of this planning application:

Document title	Author
Site Location Plan	Anomaly
Proposed and Existing Floorplans, Elevations, Sections	Anomaly
Design and Access Statement	Anomaly
Noise Assessment	KP Acoustics
Sustainable Design and Construction Statement	Innovo
Heritage Assessment	Iceni Projects

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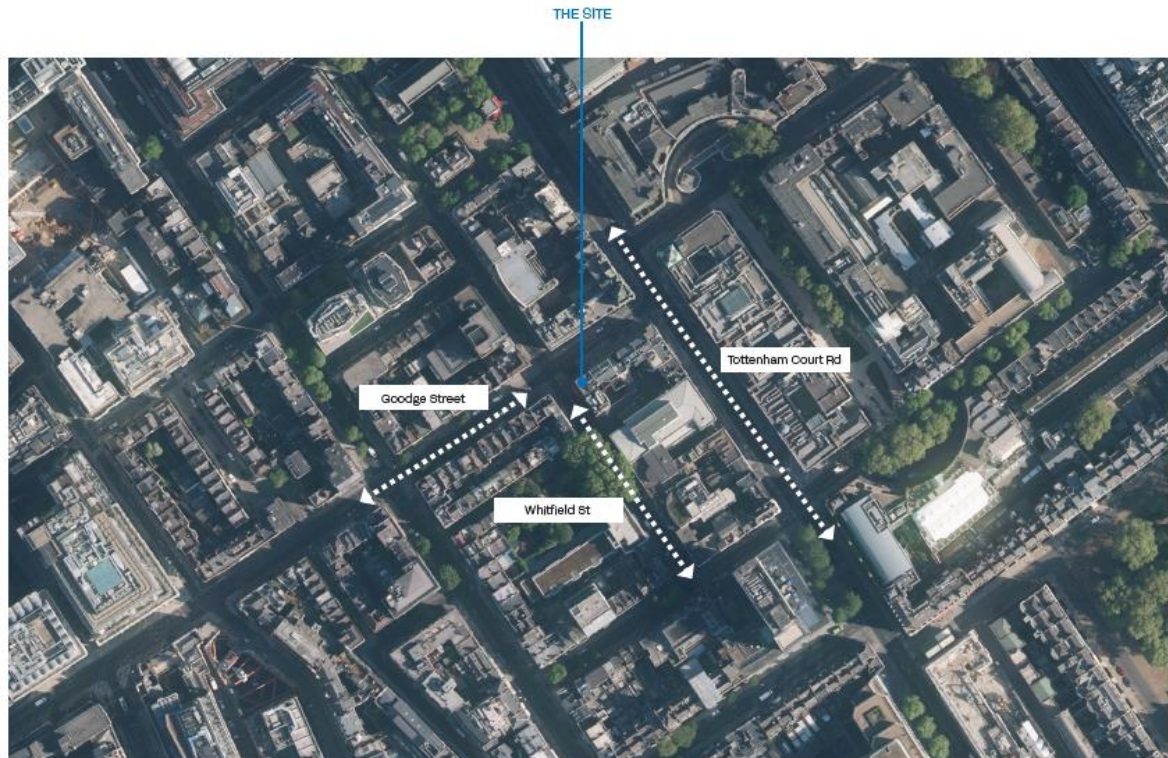
## 2. APPLICATION SITE AND BACKGROUND

### Site Description

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- 2.1 The Site comprises a prominent corner plot located at the junction of Whitfield Street (to the east) and Goodge Street (to the north). It extends to an approximate area of 178sqm. It is located within the Bloomsbury ward within the London Borough of Camden
- 2.2 The Site accommodates a ground and lower ground, plus four levels of commercial above (Class E) building constructed in c 1950s. The building is currently occupied by Spaghetti House, with the primary trading areas being at ground and first levels. The second and third levels comprise function room areas, whilst the fourth level accommodates ancillary office space.
- 2.3 The lower ground floor currently comprises storage space as well a commercial kitchen. The building also benefits from vaults at the lower ground floor which are currently used as storage space.
- 2.4 The building adopts a corner plot formed in brick masonry with horizontal windows with a curved façade and Art Deco design. The fourth level is constructed in a mansard form which is setback from the primary frontages to Whitfield and Goodge Street.
- 2.5 In terms of planning designations, the Site is located within Camden's Central London Area, the Goodge Street Local Centre, and the Fitzrovia Action Plan Area. The Site is also identified as being within the Crossrail 2 Safeguarding Area.
- 2.6 The Site is subject to London View Management Framework Protected Vista – 2B.1 Parliament Hill oak tree to Palace of Westminster.
- 2.7 The Site is not identified as comprising any listed buildings; however, it is situated within the Charlotte Street Conservation Area. The Charlotte Street Conservation Area Appraisal and Management Plan (2008) assesses the key characteristics of the conservation area. The Site is neither identified as a positive or negative contributor to the conservation area by the Appraisal. 13 Goodge Street which adjoins the Site to the east is identified as a positive contributor, however, this site has since been redeveloped.
- 2.8 There are no statutory or non-statutory designated sites of nature conservation interest within or adjacent to the application site. No trees on or within the surrounding area of the site are covered by Tree Preservation Orders

Figure 2.1 – Site Location Plan



Source: Anomaly

## Site Context

2.9 The Site's immediate context is mixed use in nature and characterised by commercial office and residential buildings with active retail uses situated on the ground floor level

2.10 The Site's immediate context can be summarised as follows:

- **North:** beyond Goodge Street is a ground plus three storey commercial office building with a ground floor Tesco metro unit. Further north along Whitfield Street is a terrace of ground plus four storey commercial buildings.
- **East:** sharing a party wall with the Site at 13 Goodge Street is a mixed-use building with ground floor retail and residential accommodation above. This building was recently constructed in accordance with a permission granted in 2014 (Council ref: 2013/6456/P) and comprises ground plus four storeys with the top level being constructed in a mansard form

Further north east of the Site at the corner of Tottenham Court Road and Goodge Street is a Grade II listed building. The building is ground plus two – five storeys in height where it fronts Tottenham Court Road. It is an example of the Free Renaissance Style incorporating a rich materiality of red brick, Portland stone, and granite.

- **South:** sharing a party wall with the Site is 26-28 Whitfield Street which is a mixed-use building comprising commercial at ground level with four floors of residential above. Further south fronting Whitfield Street is the former British Transport Police building. Permission was granted in 2022 (Council ref: 2022/0568/P) for the change of use of the building from a police station to offices.
- **West:** at the corner of Whitfield Street and Goodge Street is 19 Whitfield Street and 27-29 Whitfield Street which are mixed use buildings with ground floor commercial and residential accommodation above.

2.11 The Site also benefits from a public transport accessibility level (PTAL) of 6b, indicating excellent access to public transport. Goodge Street station which is serviced by the northern line is a short walk from the Site.

2.12 The Site is, therefore, in a highly sustainable location for the enhancements and extensions sought, with all the infrastructure required to support the proposed development in situ, including community infrastructure, pedestrian and cycle infrastructure, public transport connectivity.

### Planning History

2.13 The site has been subject to various planning applications. The most relevant to this application are summarised in Table 2.1 below.

**Table 2.1 Summary of relevant applications**

Application ref.	Description	Status
2015/6822/P	Change of use of 3rd and 4th floor levels from restaurant and ancillary office use (Class A3) to create 1 no. self-contained flat (Class C3); three storey rear extension following removal of fire escape stairs; mansard roof extension and creation of roof terrace above; relocation of metal railings; relocation of plant; alterations to fenestration; and associated works.	Withdrawn. <i>Note: this application was recommended for approval at members briefing on 29/02/2016</i>
2011/6145/P	Replacement of windows with enlarged windows at ground floor level to Whitfield Street and Goodge Street elevations, replacement of entrance door, installation of 3x condenser units to main roof, 1x condenser unit at ground floor on rear elevation and new	Approved 15/10/2012



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Application ref.	Description	Status
	extract duct from basement to ground floor level of existing restaurant (Class A3) (Retrospective).	
9500081	The installation of kitchen extract duct work on the roof as shown on drawing numbers 9064B as revised by letter dated 8 September 1995	Approved 15/12/1995

2.14 Collectively, while there have been minor alterations to the building over time, the comprehensive refurbishment of the Site has not been carried out for a significant period of time and therefore the building is in need of comprehensive refurbishment to meet modern day commercial needs.

2.15 The relevant planning permissions granted for the Site available online do not contain any land use restrictions. As a result, the existing lawful use of the building is open Class E.

#### **Pre-Application Discussions**

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2.16 In advance of submitting the planning application, the Applicant has engaged in formal pre-application discussions with planning and design officers from the Council (ref. 2023/2610/PRE). This included a meeting on site on 3 August 2023, with written feedback received on 27 October 2023.

2.17 The proposals were subject to an iterative design process with officers. This included the submission of a series of design updates, specifically in relation to the built form and setback of the fourth-floor extension and proposals to enhance the façade. This ultimately resulted in officers advising that they were strongly supportive of the proposal, noting that it was of high quality and would enhance the setting and character of the building.

2.18 In summary, the pre-application discussions saw the proposals receive the following feedback:

#### Land Use:

- The retention of the basement and ground floor levels, and refurbishment of the upper floors of the building to be in use as Class E is considered appropriate and compliant with Policies E1 and E2 of the Camden Local Plan 2017.

#### Design and Conservation:

- The replacement roof extension with a terrace amenity space above is supported.

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- The proposed replacement of the unique architectural design elements of the fenestration including new double-glazed windows matching the details of the existing, and window awnings (red) is supported.
  - The proposed refurbishments to the commercial shopfront are supported.
  - The proposals are considered to be high quality and designed sensitively and are thus acceptable from a design standpoint. The proposals will further serve to preserve and enhance the setting and the character of the existing building as well as the wider Charlotte Street Conservation Area and are thus acceptable from a conservation standpoint.
  - Although the lift overrun and mechanical plant at roof level would not be visible from the street, further design details of this structure and any works to the rear of the property should be provided in the application.

#### Amenity

- The proposed roof extensions and roof level terrace space would not result in any amenity impacts on adjoining properties in terms of noise, privacy and overlooking, and daylight and sunlight.

2.19 The proposals have evolved in response to the feedback received, as outlined in the Design and Access Statement and this Planning Statement.

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### 3. PROPOSED DEVELOPMENT

3.1 This planning application seeks full planning permission for the following:

Replacement of the existing fourth floor mansard roof structure with a new single-storey extension to accommodate additional commercial floorspace (Class E) with a roof level terrace above, alterations to the ground floor entrance, external improvements to the Goodge Street and Whitfield Street facades including replacement windows, provision of replacement plant and machinery at roof level, and other associated works.

3.2 Specifically, this application seeks full planning permission for the following works:

- Demolition of the existing fourth floor mansard level, and the construction of new single storey extension, with a roof level terrace amenity space above.
- Improvements at ground floor level to create a more permeable and active frontage to the ground /lower ground floor flexible Class E unit.
- Improvements to the circulation strategy including the provision of a new lift and internal stair to provide access between the ground and lower ground floor flexible Class E unit.
- Alterations to the primary Whitfield and Goodge Street elevations including the replacement of all windows to match the style of existing and replacement awnings in red to match existing.
- Provision of end of journey facilities including cycling storage spaces within the existing basement space.
- Associated building servicing and overall sustainability improvements including the replacement of plant and machinery at roof level.

3.3 Specific details of the proposal are outlined in the full set of proposed plans and Design and Access Statement prepared by Anomaly which accompany this application.

3.4 A photomontage of the proposed development from the corner of Whitfield Street and Goodge Street is provided at Figure 3.1 below.

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**Figure 3.1 – Photomontage of the proposed development – from the corner of Whitfield Street and Goodge Street**



Source: Anomaly

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### **Proposed Class E Uses**

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- 3.5 At ground level and lower ground, the proposal seeks improvements to existing frontage to Whitfield Street and Goodge Street to create a permeable frontage to a future flexible Class E unit.
- 3.6 Given the end user of this space is not yet known, the Applicant is seeking flexibility for the space to be used for all of the uses within Class E with the exception of:
- Class E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink,), and
  - Class E(f) Creche, day nursery or day centre (not including a residential use).

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- 3.7 Flexibility is also sought for the ground floor level to be used for the purposes of a pub/drinking establishment (sui generis).
- 3.8 Above ground level, the proposal seeks the enhancements to the existing commercial floorspace at first, second and third floors, and construction of a fourth floor extension to accommodate additional commercial office floorspace (Class E (c) and (g)(i)).

#### **Land Use Area Schedule**

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- 3.9 Overall, the proposals would result in the provision of 578.8 sqm Gross Internal Area (GIA) of commercial (Class E) floorspace, a net increase of 18.5 sqm in overall GIA when compared to the existing scenario. An existing versus proposed area schedule can be found below:

**Table 3.1 Existing vs proposed area schedule**

<b>Use</b>	<b>Existing sqm (GIA)</b>	<b>Proposed sqm (GIA)</b>	<b>Net Change sqm (GIA)</b>
Commercial (Class E)	560.3	578.8	+18.5

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## 4. PLANNING POLICY

4.1 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section identifies the principal planning policy considerations which have informed the development proposals, and which provide the context for the consideration of this planning application, as well as other material considerations. The current development plan consists of:

- The London Plan (2021)
- The Camden Local Plan (2017)

4.2 Other material considerations include:

- National Planning Policy Framework (2021)
- National Planning Practice Guidance (2021)
- Camden also has a number of Camden Planning Guidance documents (CPGs), along with the Charlotte Street Conservation Area Appraisal and Management Document (2008) which form material considerations for this application.

4.3 In addition, the London Borough of Camden are also in the process of preparing their new Local Plan, having recently completed the initial engagement stage in January 2023. A new Draft Local Plan and Site Allocation document is expected to be available for public consultation in 2024.

### **National Planning Policy**

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4.4 The National Planning Policy Framework (NPPF) provides the planning policies for England and how these should be applied. This section provides an overview of the Government's national planning policy and guidance that is relevant to the proposed development.

4.5 The updated National Planning Policy Framework (NPPF) was published in February 2021 and sets out the Government's economic, environmental, and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system.

4.6 The National Planning Policy Guidance (NPPG) is a web-based resource that was published on 6 March 2014 and provides information and guidance on planning. The NPPF and NPPG form material considerations in the determination of the application.

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## **The London Plan (2021)**

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4.7 The London Plan (2021) forms part of Camden Council's Development Plan meaning the policies within it are a material consideration in the determination of this application. Relevant policies contained within the document are set out below:

- Policy SD4 (the Central Activities Zone)
- Policy SD5 (Offices, other strategic functions and residential development in the CAZ)
- Policy D1 (London's form, character and capacity for growth)
- Policy D3 (Optimising site capacity through the design led approach)
- Policy D4 (Delivering good design)
- Policy D5 (Inclusive design)
- Policy D12 (Fire Safety)
- Policy D13 (Agent of change)
- Policy D14 (Noise)
- Policy E1 (Offices)
- Policy E2 (Providing suitable business floorspace)
- Policy HC1 Heritage conservation and growth
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy SI 2 (Minimising greenhouse gas emissions)
- Policy SI 7 (Waste capacity and new waste self-sufficiency)
- Policy T4 (Assessing and mitigating transport impacts)
- Policy T5 (Cycling)
- Policy T6.2 (Office parking)

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### **Camden Local Plan (2017)**

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4.8 The Camden Local Plan sets out the spatial strategy and the vision for the Borough and was formally adopted on 3 July 2017.

4.9 The following policies are relevant to the proposals:

- G1 Delivery and location of growth
- A1 Managing the impact of development
- A4 Noise and vibration
- D1 Design
- D2 Heritage
- D3 Shopfronts
- E1 Economic development
- E2 Employment premises and sites
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- T1 Prioritising walking, cycling and public transport
- T2 Parking and car-free development
- TC4 Town Centre Uses

4.10 The following CPG's are relevant to the development and thus form material considerations for this application:

- CPG Design (2021)
- CPG Amenity (2021)
- CPG Transport (2021)
- CPG Employment Sites & Business Premises (2021)
- CPG Town Centres and Retail (2021)



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- CPG Developer's Contributions (2019)
  - Charlotte Street Conservation Area Appraisal and Management Document (2008)

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## 5. PLANNING ANALYSIS

- 5.1 This section reviews the key planning considerations arising from the Proposed Development. It provides a reasoned justification for the Proposed Development in the context of relevant policy and the specifics of the site and its surroundings.

### **Need/Principle of Development**

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- 5.2 Policy E1 'Offices' of the London Plan (2021) states that improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision and refurbishment.
- 5.3 Policy E1 of the Camden Local Plan (2017) sets out the Council's economic development objectives. It identifies that between 2014 and 2031, 695,000 sqm of new office accommodation is needed within the borough. Policy E1 directs the majority of this growth to the Central London area of the borough, in which the Site is situated.
- 5.4 Policy E2 of the Camden Local Plan (2017) additionally states that proposals which would intensify the employment potential of sites are encouraged.
- 5.5 As set out within Section 2 of this report, the existing lawful use of the building is open Class E, and the emerging proposals would not seek to amend the existing use of the Site.
- 5.6 The proposals would see poor quality and underutilised Class E space enhanced to ensure its long-term viable future to meet the needs of modern commercial end users. This would include the delivery of a permeable ground / lower ground floor flexible Class E unit and demolition of the existing mansard level, and the construction of new single storey extension structure which would accommodate additional and enhanced commercial floor area with roof level amenity space above.
- 5.7 The proposal, therefore, is entirely consistent with the land use objectives of these policies in that it would enhance the employment generating capacity and the quality of the floorspace of an existing Class E building which would be suitable for smaller and medium sized businesses.

### **Design, Heritage and Townscape**

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#### **Policy Framework and Background**

- 5.8 Good design is a central objective of the London Plan (2021), Policy D4 outlines that new development should deliver high quality design and place-making.

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- 5.9 Policy D1 and D2 of the Local Plan (2017) emphasise the importance of high-quality design and, in the case of Policy D2, the need for proposals to preserve and enhance the character and appearance of conservation areas and nearby heritage assets.
- 5.10 The Charlotte Street Conservation Area Appraisal and Management Plan (2008) assesses the key characteristics of the conservation area. The Site is neither identified as a positive or negative contributor to the conservation area by the Appraisal. 13 Goodge Street which adjoins the Site to the east is identified as a positive contributor, however, this site has since been redeveloped.
- 5.11 Camden's Design CPG emphasises Camden's commitment to design excellence and expects development schemes to consider the context of a development and its surrounding area and look at opportunities for development to improve the character and quality of an area.
- 5.12 The Site sits on a prominent corner plot at the junction between Goodge Street and Whitfield Street. The existing building, which dates from the 1950s, is designed in an Art Deco fashion. Whilst the existing fenestration and façade is unique and worth celebrating, the mansard extension is of poor quality and there is an opportunity to replace this structure with a high quality fourth floor extension that is more in keeping design of the host building and broader conservation area.
- 5.13 The scheme is submitted following pre-application discussions with the Council which saw officers advising that the proposals are acceptable from a design standpoint, noting that the scheme is of a high quality, designed sensitively and will further serve to preserve and enhance the setting and the character of the existing building as well as the wider Charlotte Street Conservation Area.

#### **Roof Extension**

- 5.14 The proposal seeks the demolition of the existing fourth floor mansard, and construction a single storey roof extension with a roof level amenity space above. The extension features a matching form with matching horizontal windows and a curved facade finished with glazed tile. The extension would be set back behind the existing parapet, allowing for a degree of legibility and subservience.
- 5.15 To help break up the bulk of the roof extension when viewed from the street, two different colours of glazed tile are utilised. The lighter coloured tile shown on the parapet and vertically at each end results in a lightweight form, complementing the white rendered ground floor commercial shopfront. The horizontal banding replicates the horizontal form of the windows on the lower floors.
- 5.16 These works also present an opportunity to enhance end user wellbeing through the provision of a landscaped roof level terrace amenity space. The parapet of the fourth-floor extension is sought to be raised to act as railing to the terrace space with landscaped planting set behind. This will ensure that visual clutter is minimised when viewing the building from the public domain.

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- 5.17 The proposed extension is considered to reflect the evolving built forms of the local area, in particular the local examples of taller corner buildings which possess a greater degree of prominence in their streetscapes and aid in wayfinding and contributing to a defined sense of place. As the Site is located at a prominent corner plot, this allows it to hold a degree of prominence without competing with visual characteristics of the conservation area.
- 5.18 The proposals would also see the installation of plant and core pop up at roof level. As demonstrated in selected viewpoints from Goodge and Whitfield Street, this roof level plant would be well setback and would not be visible from the public realm.

#### **Façade Treatment and Design**

- 5.19 As outlined in the accompanying Design and Access Statement, the proposals seek minor alterations to the primary Whitfield and Goodge Street elevations including the replacement of all windows to match the style of existing and replacement awnings in red to match existing.
- 5.20 These works would see the architectural composition of the building including its art deco style retained, whilst representing a necessary enhancement to the thermal performance of the building.

#### **Ground Floor Frontage**

- 5.21 The proposals also seek interventions at ground floor level to refurbish the existing shopfront. In response to the pre-application feedback received, the proposals seek to re-introduce the solid band along the base of the window and then taking the windows back to be more in keeping with the original form.
- 5.22 These works would improve the permeability of the building which would enhance the Site's relationship with the street, street life, and public realm. The existing awnings would remain in situ to be utilised as external space by the flexible Class E tenant at ground / lower ground levels.

#### **Heritage Assessment**

- 5.23 The accompanying Heritage Statement confirms the proposed development will not impact the significance of the Grade II listed 64-67 Tottenham Court Road and 2-8 Goodge Street. This is due to its limited, sensitive design and its distance from the asset.
- 5.24 In summary, it is concluded that the proposal is considered beneficial to the townscape and Charlotte Street Conservation Area, as it addresses current disrepair and wear and tear that degrade the local environment. The redevelopment introduces a high-quality design, which respects the existing structure. The Site, positioned at a busy junction, holds a degree of prominence without conflicting with the local 18<sup>th</sup>- century character, allowing for an elevated design that improves the sense of place.

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- 5.25 Overall, the emerging proposal represents a sensitive refurbishment and extension to an existing Class E building which is considered to comply with relevant design policy and guidance.

### **Amenity of Surrounding Properties**

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- 5.26 Policy A1 of the Local Plan 2017 seeks to protect the quality of life of occupiers and neighbours of new development. It seeks to ensure that the amenity of communities, neighbours and occupiers is protected. The key considerations in relation to amenity for the emerging proposals are addressed as follows:

#### **Daylight and Sunlight**

- 5.27 The proposed replacement built form at fourth floor level is of a similar form and massing as the existing structure. Overall, the proposals are therefore expected to result in a negligible change to the levels of daylight and sunlight access to adjoining residential properties.

#### **Privacy and Overlooking**

- 5.28 New windows and other openings to the proposed new mansard structure would be oriented toward Whitfield and Goodge Street in line with the existing scenario.
- 5.29 The proposal seeks the provision of a roof level terraced amenity space above the replacement roof extension. The proposed terrace space would be orientated toward Whitfield Street (west) and Goodge Street (north).
- 5.30 In addition, a new plant room / stair pop-up would be located in the south-eastern corner of the terrace at the Site's boundary with 13 Goodge Street. This structure would obstruct any opportunities for overlooking toward the existing external rear amenities spaces of the residential properties within this building.
- 5.31 By virtue of these locational and design features it is not expected that the emerging proposals would cause any privacy, overlooking or noise related amenity issues to adjoining properties. Rooftop and rear terrace spaces are a common feature of the site's immediate surrounding context and thus the proposed terrace spaces would be entirely compatible with its surrounds.

#### **Noise**

- 5.32 Appendix 3 of the Local Plan 2017 relates to noise and states that the relevant noise limits for mechanical plant are 10 dB below the measured background noise level during the hours of proposed operation.

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- 5.33 The proposal seeks the installation of a replacement mechanical plant and lift overrun at roof level. A Noise Impact Assessment including unattended noise monitoring has been prepared and undertaken by KP Acoustics to accompany the application.
- 5.34 The assessment and monitoring confirm that the noise criterion is met at all assessment locations during all periods of the proposed rooftop plant operation, assuming the plant is installed within the four-sided acoustic screen which is proposed as part of this application.
- 5.35 The noise level for the proposed plant and acoustic enclosure would, therefore, comply with the relevant criteria required by Policy A4 of the Local Plan (2017).

### **Transport**

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- 5.36 Given the sustainable location of the Site (classified as 'excellent' by TfL), the Proposed Development is to be car-free with no vehicular parking spaces provided. This is considered to be an appropriate outcome which is in accordance with Policy T2 of the Local Plan.
- 5.37 Policy T1 of the Local Plan (2017) seeks to ensure that development meets the minimum standards for cycle parking facilities outlined within the London Plan. Based on these standards, the Site would be required to provide a total of 8 long stay spaces and 1 short stay space.
- 5.38 At present there is no long stay cycle parking provided in the building. The proposals would see the provision of a total of 6 cycle parking spaces (comprising 5 long stay and 1 short stay) at basement level which would be accessed from the entrance at Whitfield Street down a set of internal stairs or via the new lift. End of journey facilities are also sought to be provided in the form of a new shower at basement level.
- 5.39 As the proposals only seek a minor increase in floorspace and the proposals are seeking to retrofit an existing building that is highly constrained, this is considered an acceptable outcome when weighed against the overall planning and heritage benefits of the scheme. Overall, it is considered that the proposed cycle parking provision is appropriate for the Site and would result in a significant improvement on the existing scenario.

### **Accessibility**

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- 5.40 Policy D1 'Design' of the Local Plan seeks high quality design which includes design that is inclusive and accessible for all. Supporting text notes that any adaptation of existing buildings must respond to access needs whilst ensuring that alterations are sympathetic to the building's character and appearance.

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- 5.41 Policy C6 'Access for All' of the Local Plan promotes fair access in developments and expects all buildings to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.
- 5.42 Policy D5 of the London Plan (2021) requires all new development to achieve the highest standards of accessible and inclusive design and meet the changing needs of the population over their lifetimes.
- 5.43 The proposals seek to retaining the existing step free entrance arrangement at primary entrance at the corner of Goodge Street and Whitfield Street. This would ensure the building would continue to be accessible to and used by all in accordance with Policy D1 and C6 of the Local Plan

### **Sustainability and Energy**

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- 5.44 Built environment sustainability is incorporated within policy and regulation at a national and local level. The Climate Change Act 2008 and the National Planning Policy Framework set out national frameworks by which to mitigate climate change, achieve reductions in carbon dioxide emissions, and deliver development that is aligned with the presumption in favour of sustainable development.
- 5.45 Policies CC1 (Climate change mitigation) and CC2 (Adapting to climate change) require all developments to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards.
- 5.46 The proposals would see the retrofitting of an existing commercial asset with one of the central objectives of the scheme being to improve the sustainability and energy efficiency credentials of the building.
- 5.47 The various works described within the Design and Access Statement are underpinned by the delivery of new energy efficient mechanical and electrical systems, provision of end of journey facilities, improvements to glazing performance and other measures where appropriate.
- 5.48 A Sustainable Design and Construction Statement has been prepared by Innovo to accompany the proposals which outlines the technical information on the sustainability improvements offered by the proposals. As a result of these interventions, the building is expected to comply with the guidelines set out in relevant local, regional and national documents.

### **Fire Safety**

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- 5.49 As the building does not meet the definition of a 'relevant building' as part of the new regulations regarding Fire Gateway One assessments for development, the application is not accompanied by a fire assessment.

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- 5.50 The modernisation of the building would see all other existing fire access and egress arrangements remain in place through the external stair which runs from level 1-4 and transfers into a stair running from 1<sup>st</sup> floor to ground.

#### **Delivery and Servicing, and Refuse Collection**

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- 5.51 Policy CC5 (Waste) and CPG (Design) of the Local Plan (2017) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.
- 5.52 The proposal seeks to create a redesigned bin store at basement level. Bins would be transported up to ground floor via the new lift and collected on street.

#### **Community Infrastructure Levy**

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- 5.53 The proposals would result in less than 100sqm of new build development, and therefore the application is not liable for the payment of CIL. A completed CIL Form 1 is submitted with this Application.



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## 6. PLANNING BALANCE AND CONCLUSION

- 6.1 This planning application has been prepared on behalf of the Applicant in support of a planning application for full planning permission for development at 15-17 Goodge Street, London W1T 2PQ.
- 6.2 The proposals would provide significant positive economic, social and environmental, as demonstrated in this report.
- 6.3 The proposed development has sought to achieve the following principal development objectives:
- The scheme is fully aligned with the Economic, Social and Environmental pillars of the NPPF.
  - Taking a retrofit approach through retaining, extending and optimising the existing building to enhance its employment generating capacity as a prime commercial asset within a city centre location.
  - Appropriately responding to the massing and built form of the Site and its immediate context.
  - Improve the efficiency and legibility of the existing building entrance such that it presents a more active and permeable relationship with the street scene.
  - Enhancing the visual quality of the building's primary façade to Whitfield Street and Goodge Street.
  - Maintain the existing levels of amenity enjoyed by neighbouring properties in relation to daylight and sunlight, overlooking and privacy, and noise.
  - Improving the amenity and staff wellness of future occupants of the Site through the provision of a roof level terrace amenity space, provision of end of journey facilities, and enhancing the daylight and natural ventilation levels within the commercial floorplates.
  - Improve the energy and resource efficiency of the building.
- 6.4 Paragraph 11 of the NPPF applies the presumption in favour of sustainable development and requires decision makers to consider whether relevant development plan policies are up to date. Decision taking is identified in Part (c) and (d) of Paragraph 11, which states:

*c) approving development proposal that accord with an up-to-date development plan without delay; or*

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*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>8</sup>, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed<sup>7</sup>; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole.*

- 6.5 As the preceding planning analysis demonstrates, the scheme accords with both local and national policy, whilst providing numerous economic, social and environmental benefits that weigh in support of the scheme being granted planning permission. Therefore, the proposals should be approved without delay in accordance with Paragraph 11(c) of the NPPF.
- 6.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.7 A comprehensive assessment of the proposed development against the development plan policies has been undertaken. It is apparent that there are no technical constraints or barriers that would prevent the development from coming forward, and that the proposed development accords with National and Local Planning Policy. Accordingly, planning permission is sought for the proposal.