
From: Miriam Baptist
Sent: 28 July 2023 09:09
To: Stuart Blakley - TW London
Subject: Preapp Advice Response - 2023/1492/PRE - Land to west of Royal Mail Sorting office bounded by Phoenix Place, Mount Pleasant, Gough Street & Calthorpe St. Camden WC1.

Dear Stuart,

RE: 2023/1492/PRE - Land to west of Royal Mail Sorting office bounded by Phoenix Place, Mount Pleasant, Gough Street & Calthorpe St. Camden WC1. - *Amalgamation of commercial Units 2 and 3, associated changes and changes to loading bay arrangement.*

Thank you for your pre-app enquiry and your patience while I have run this past different parties in the council. Please find our comments below at this stage.

The proposal is for changes to commercial Units 2 and 3 (both 98 sqm GIA), including amalgamation, and for the improvement of the loading arrangement, all in association with Phase 1 Mount Pleasant. The changes are sought due to lack of market interest in the units due to their small size.

Planning background:

Original permission **2013/3807/P** - *Comprehensive redevelopment, following the demolition of existing buildings, to construct four new buildings ranging from 5 to 15 storeys (above basement level) in height, to provide 38,724 sqm (GIA) of residential floorspace (345 dwellings) (Class C3), 823 sqm (GIA) of flexible retail and community floorspace (Use Classes A1, A2, A3, D1 or D2), with associated energy centre, waste and storage areas, basement level residential car parking (54 spaces), the re-provision of Royal Mail staff car parking (approx 196 spaces) cycle parking, residential cycle parking (431 residential spaces) hard and soft landscaping to provide public and private areas of open space, alterations to the public highway and all other necessary excavation and enabling works. The application is accompanied by an Environmental Statement. **Granted subject to a Section 106 Legal Agreement on 27/02/2014.***

Site Constraints

- Bloomsbury Conservation Area
- Central London Area
- Public road
- Site 34 – Phoenix Place – Proposal Site 2006
- Site 24 – Phoenix Place – LDFSiteAllocation
- Mount Pleasant Neighbourhood Area
- Mount Pleasant Neighbourhood Forum
- SALP Knowledge Quarter Innovation District
- SALP Holborn and Covent Garden Area

Principle of amalgamation

We note that the proposal for larger units, and possibly the associated larger named brands they are likely to appeal to, is by nature contrary to the original permission 2013/3807/P which approved small units and restricted amalgamation via condition 46 (limit on amalgamation of commercial units) in order to encourage occupation by small and independent shops and help sustain the diversity, vibrancy and character of the area as well as provide premises for local businesses.

Despite this, we may concede on the amalgamation of Units 2 and 3 on receipt of sufficient marketing evidence showing the units have been marketed as smaller separate units with limited success. Although some marketing

evidence has been received, we would like further information and detail including any specific appointment/visit dates from the interested retailers. We would also like to see evidence of the rent offer marketed to small business tenants.

The site is part of the Central District Alliance's Business Improvement District area and so it would be useful to know if there has been any communication or assistance from them in marketing the units, or finding meanwhile uses.

Any remaining empty units we would be keen to know what efforts will be made to ensure these are attractive for smaller businesses, including exploring options for meanwhile use(s) or offered to small retail/retail start-ups at below market rent.

Opening hours

We note that extended opening hours are by nature contrary to the original permission 2013/3807/P which restricted opening hours and serving hours via conditions 38 (hours of use of flexible commercial uses) and 39 (servicing hours).

We are not likely to consent to an earlier opening time for either of the units, however, there may be some level of flexibility if a clear Management Plan is put in place, ensuring the amenity of neighbouring residences is adequately protected. Deliveries and unloading are deemed inappropriate at this early hour in such close proximity to many dwellings. Detail would need to be provided on exactly what would occur before 7am at the premises in terms of activity and noise. Overall, the council is unlikely to support this amendment to the conditions of the original permission.

Obscuring of glazing

We note that the obscuring of glazing, or fixtures directly behind glazing, above a height of 1.4m above FFL is protected in the original permission 2013/3807/P via condition 40 (glazing to ground floor elevations).

We do not support the obscuring of glazing in this location or fittings/displays being located in such close proximity to the windows, and maintain that fixtures and fittings should not be placed within 1 metre of the inside of the window. Passive surveillance and active frontages along the street are important principles to which tenants' internal layout and design must respond.

External roller shutter

An external roller shutter is not acceptable, particularly in a conservation area. The introduction of security measures would detract from the appearance of the building and the wider area. The Council will prefer the use of security measures that do not require external shutters or grilles such as:

- the strengthening of shopfronts;
- the use of toughened or laminated glass;
- internal grilles or collapsible gates - these do not normally require planning permission unless they result in a material alteration to the external appearance of the shopfront
- improved lighting

Potential loading bay directly outside units

While we note that the Delivery and Servicing Plan of the original permission discourages any loading bays on the unit side of the road, we would be willing to consider providing a loading bay or double yellow lines to facilitate servicing at full planning application stage. It is noted that loading bays are usually permitted where they are intense servicing requirements throughout the day, double yellow lines are a more common solution.

Full planning application stage:

In the event of the submission of a planning application you would need to provide the following for a valid application:

- A full planning application form
- The correct fee
- Existing and proposed sections, drawings, and plans with scale bar
- Site location plan at a scale of 1:1250 with scale bar)

- Design and access statement
- A Management Plan (depending on what is proposed post-preapp advice)
- Marketing evidence - further information and detail including any specific appointment/visit dates from the interested retailers. Also to include evidence of the rent offer marketed to small business tenants.
- Any communication/ evidence of involvement with the Central District Alliance's Business Improvement District
- Any proposals for meanwhile use(s) or evidence of units offered at below market rent to small retail/retail start-ups while units remain empty.

Please note: This represents an initial informal officer view of your proposal based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

Thank you for using Camden's pre-application advice service.

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