

27 Great Queen Street

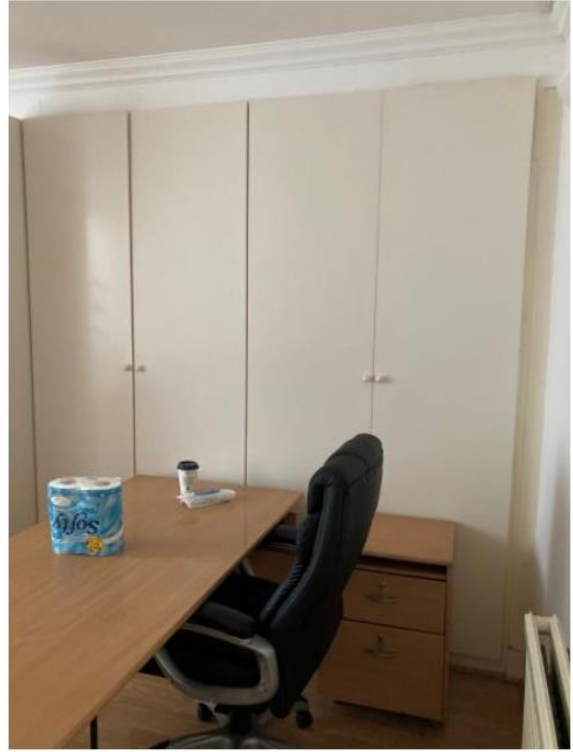
2022/0905/P and 2022/3009/L



27 Great Queen Street



Existing front elevation



Existing offices



Existing hallways

Delegated Report (Members Briefing)	Analysis sheet		Expiry Date: 02/05/2022 (P) 28/09/2022 (L)	
	N/A / attached		Consultation Expiry Date: 25/09/2022	
Officer			Application Number(s)	
Leela Muthoora			2022/0905/P 2022/3009/L	
Application Address			Drawing Numbers	
27 Great Queen Street London WC2B 5BB			See the draft decision notice	
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature	
Proposal(s)				
Planning permission: Change of use of building from an office (Class use E) to a private members' club (sui generis).				
Listed building consent: Refurbishment works and alterations to the interior of the building at all levels, replacement dormer window to match existing.				
Recommendation:		i. Grant conditional planning permission subject to s106 agreement ii. Grant conditional listed building consent		
Application Type:		Full Planning Permission and Listed Building Consent		
Consultations				
Adjoining Occupiers:	No. of responses	3	No. of objections	3
Summary of consultation responses:	<p>Site notices were displayed near the site from 20/04/2022 to 14/05/2022, and from 26/08/2022 to 19/09/2022. Adverts were published in the local press on 21/04/2022 and 01/09/2022.</p> <p>3 letters of objection were received from two residents in Parker Street (to the rear of the site around 20m away) and from Covent Garden Community Association (CGCA). Their objections are summarised below:</p> <ul style="list-style-type: none"> • Generally support the use • Concerns around potential amenity impacts arising from operation beyond framework hours – particularly 11:30pm. • Need for controls over hours, noise, membership, and servicing <p><u>Officer Response:</u> Amenity is discussed in detail in section 3 of the report below. To address concerns raised, officers recommend conditions to:</p> <ul style="list-style-type: none"> • control hours, 			

- *require a management plan before the use can operate beyond 11:30pm,*
 - *limit noise breakout, and*
 - *control hours of servicing.*
- The conditions above, suggested by residents and CGCA, are considered sufficient to manage impact without the need for the additional condition requested by CGCA to control membership.*

Bloomsbury Conservation Area Advisory Committee (CAAC)

No comments.

Site Description

The site is a three-storey terrace building, plus lower ground and roof accommodation. It is on the north side of Great Queen Street, Covent Garden, between Long Acre and Kingsway. It has been vacant since 2021 but was previously in use as offices.

It is a grade II* listed early Georgian townhouse dating from circa 1733. It is in Seven Dials Conservation Area.

Relevant History

No relevant recent history.

Relevant policies

The National Planning Policy Framework 2023

London Plan 2021

Camden Local Plan 2017

- Policy G1 - Delivery and location of growth
- Policy DM1 - Delivery and monitoring
- Policy C6 - Access for all
- Policy E1 - Economic development
- Policy E2 - Employment premises and sites
- Policy A1 - Managing the impact of development
- Policy A4 - Noise and vibration
- Policy D1 - Design
- Policy D2 - Heritage
- Policy T1 - Prioritising walking, cycling and public transport
- Policy T2 - Parking and car-free development

Camden Planning Guidance (CPG)

- Amenity
- Design
- Employment sites and business premises
- Transport
- Seven Dials Conservation Area Statement

Draft Camden Local Plan

The Council has published a new [Draft Camden Local Plan](#) (incorporating Site Allocations) for consultation (DCLP). The DCLP is a material consideration and can be taken into account in the

determination of planning applications, but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

Assessment

1. Proposal

1.1. Planning permission is sought for the change of use of building from an office (Class use E) to a private members' club (sui generis). The proposal also involves a series of internal refurbishment works to the listed building which are covered by the Listed Building Consent application.

Revisions:

1.2. Additional information was submitted in response to officers requesting a proposed employment and community benefit package (see paragraph 2.10).

Assessment

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

- Land use
- Amenity
- Heritage
- Transport

2. Land use

- 2.1. The proposal is to change the use of the building from offices to a private members' club. The proposal is for use by the Savage Club, a gentleman's club named after the poet Richard Savage which was founded in Drury Lane in 1857.
- 2.2. Local Plan Policy E1 confirms we will safeguard existing employment sites (such as offices) that meet the needs of industry, and support employment and training schemes for Camden residents. Policy E2 says we resist loss of business premises for non-business use unless the building is no longer suitable and similar or alternative uses have been explored over time.
- 2.3. The last use of the building was as offices, but they have remained vacant since 2021. The floorplan layout is largely intact and following the original residential historical layout. This basic two room layout per floor means there are four principal rooms at the front, and four secondary rooms at the rear. The rear projection at ground floor provides a usable space too. Other spaces are secondary circulation, stairs or toilets (or very small awkward spaces). This provided around 162 sqm of net usable employment floorspace.
- 2.4. The CPG on Employment sites and business premises indicates an employment density of around 1 employee per 12sqm NIA – this means the existing capacity could be around 13-14 ($162/12=13.5$). This is based on the 2015 edition of the Homes and Communities Agency, Employment Density Guide. Since COVID, employment densities have generally dropped with businesses seeking more space per employee so this would be the upper range.
- 2.5. The application includes information from a commercial office specialist setting out the difficulties in finding office tenants for these types of properties with small inflexible layouts. The growth and diversity of offerings within the serviced or co-working sectors (which also generally have lower employment densities) has made letting these properties very difficult. It confirms prospective tenants were looking for a higher level of service and infrastructure which includes reception services, shared meeting space, and break-out areas, something this site was not able to offer. Prior to vacation of the property, it was only occupied by around 4 to 5 employees reflecting the restricted nature of the floorspace.

- 2.6. The proposed use would have around eight employees working to operate the club. The main functional areas of the club are arranged to be in the front rooms of the main building with the basement and back of house areas to the rear. The basement would have an archive, within the ground floor providing a library and cloakroom. At the rear projection, there would be a rehearsal space for members who are musicians.
- 2.7. The first floor would have a small bar area (around 5sqm) and a washing up area behind it, with a club room at the front of the building. Above that on the second floor would be a meeting room at the front with the pantry and utility room at the back. The third floor would have offices. As well as the eight employees, there would be desk spaces for members to use for work at this third floor. Although there would be employment capacity at the site, and it would be higher than the previous use of 5 employees (and current vacant use), at 8 employees it would be slightly lower than a full capacity office of around 13.
- 2.8. The Public Sector Equality Duty (PSED) requires the council to have due regard to the need to achieve the objectives set out under s149 of the Equality Act 2010 to eliminate discrimination, advance equality of opportunity, and foster good relations between those who share a protected characteristic and those who don't.
- 2.9. The proposed use only permits men as members, although it allows female guests to accompany members. This will limit access to the building (which has national heritage significance – see heritage section) and so there will be a disproportionate impact on women and trans people in tension with policy C6 of the local plan, and with the aims of the PSED. Officers asked the applicant to provide some wider community benefits that could try to counter such impacts, and these include contributions to help with Inclusive Economy work, and a community inclusion measure allowing access to community and school groups (see below).
- 2.10. The challenges of letting offices such as these is recognised, especially without significant upgrades with greater building fabric intervention on the listed building. Nonetheless, officers negotiated a further package of benefits to be secured by a S106 legal agreement to mitigate the reduction in employment from 13 to 8 in line with the objectives of policies E1 and E2, and to provide more inclusive outreach with the community in line with the aims of the PSED. The applicant has agreed to the following:
- A contribution of £120,000 towards employment and training, allowing the Inclusive Economy Team to support opportunities for employment, training, work placements and apprenticeships.
 - A Local Employment and Supply Plan securing advertising of all suitable vacancies to be advertised through the Council's Construction Centre before promoting more widely; promoting employee mentoring and volunteering within the owner's employees at Freemason's Hall opposite (it is the same operator); and attending job fairs to promote local opportunities to local Camden residents.
 - Free use of the rehearsal space for two days per month by the local community and local schools, to be agreed through Camden Learning.
- 2.11. Overall, the proposal would continue to provide employment at the site, while providing minimal intervention to the listed building with no need for significant changes to optimise office capacity, which is beneficial to the listed building (see heritage section below). With a small employment shortfall of around 4-5 employees, which is likely to be lower given the inflexibility of the spaces, the loss of employment space is low. The long period of vacancy and supporting information demonstrate the difficulties in occupying the use as offices. The proposed use presents an alternative use which still provides sustainable employment at the site. Taken together with the employment and community benefits package outlined above (including £120,000 for employment and training, and local employment opportunities), the change of use is in line with the objectives of the development plan as a whole, with particular regard to policies E1 and E2.

3. Amenity

- 3.1. Policy A1 seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that would not harm the amenity of residents. This includes factors such as noise, privacy, outlook, implications to natural light, artificial light spill, and impacts caused by the construction phase of development. Policy A4 also says noise and vibration should be controlled and managed to prevent unacceptable impacts.
- 3.2. There are no significant changes to the envelope of the building that would result in any impacts in relation to light and overshadowing or outlook. The change of use and proposed additional hours of operation would potentially increase opportunities of overlooking. However, this is a dense environment in Covent Garden in central London with many very well-established evening uses and commercial uses close to residential. Market house, where the local residents who objected live, is around 20 metres away to the rear and cannot be seen from the site. There are some closer residential units but the site is mainly surrounded by other commercial uses so the actual likelihood of harmful overlooking is minimal. This is especially the case when taking into account that the rear windows of the site look onto the blank gable wall of a commercial property at the rear.
- 3.3. The potential for noise impact is more notable with noise and disturbance the key issue raised by objectors, mainly in relation to the later hours of operation. The noise report submitted with the application demonstrates the proposal is unlikely to have significant impacts on noise given the area and the nature of the use. However, it does not provide an absolute limit based on the existing background noise level which is the approach supported under the development plan. It also acknowledges that that rooflights should be closed during rehearsal activities on the ground floor at the back.
- 3.4. The local residents and the Covent Garden Community Association (CGCA) raised concerns about the potential noise impact particularly during later opening times. Most of the rooms used for members are located at the front of the building and away from the more sensitive uses which are closer to the back of house ancillary spaces with a rear aspect. The proposed hours of use are:
- Monday to Friday 07:30 to 01:30
 - Saturday, Sunday and Bank Holidays 12:00 to 23:00.
- 3.5. During the week, the proposed bar on the first floor would be open from 12:00 with last orders call at around 22:45. On dinner nights, the bar would stay open until 01:00. Whilst residents and the Covent Garden Community Association do not object to the use, they have raised concerns about operation outside of the framework hours used by licensing and have requested conditions to limit hours from 8am to 11:30pm Mon-Thu, and until midnight on Fridays and Saturdays.
- 3.6. Whilst it is important that residents and families in the area have respite from noise and disturbance, the expectation of amenity needs to be proportionate to the area in question – in this case a busy central London location at the end of Long Acre, Covent Garden. The nature of the use by the Savage Club also limits the possibility of excessive noise and disturbance from the use, when compared to a standard bar or night time use open to visiting members of the public. The membership requirements also provide an additional level of control for the establishment. Nonetheless, operating the use beyond 11:30pm will require greater management of members and guests to ensure disturbance is controlled and kept to a minimum and reasonable level.
- 3.7. As such, officers recommend a condition limiting hours of operation, but only allowing use beyond 11:30 pm if a Management Plan has first been submitted and approved by the LPA. This would need to provide details of how the club would manage numbers/capacity, noise and disturbance, and dispersal from the club upon closure.

- 3.8. The CGCA also recommended conditions controlling audible noise from the property. In line with local plan policies, there are conditions recommended providing an absolute noise limit from the property in terms of use activity, and plant or kitchen equipment, measured from the nearest noise sensitive properties, and a condition requiring the rooflights of the rehearsal space to remain shut when the space is occupied for rehearsals, in line with the recommendations of the noise report.
- 3.9. The CGCA also recommended a condition to be personal to the Savage Club and requiring a 14 day period between membership application and membership being granted. The nature of the use and its future occupier are a relevant consideration in the likelihood of noise and disturbance. However, the requirement for the 14 day period would be onerous and difficult to enforce. The noise conditions, together with the Management Plan for later hours, would achieve the same objectives and ensure noise and disturbance from the operation of the club are minimised and managed without the need for a personal permission or a 14 day wait period.
- 3.10. The CGCA also requested restrictions on deliveries and servicing, and officers have recommended a condition for these to be undertaken between the hours of 8am and 8pm in line with paragraph 6.104 of the Local Plan.
- 3.11. Subject to the conditions set out above, the impacts of the change of use can be adequately managed to ensure there is no excessive noise and disturbance in line with policies A1 and A4 of the Local Plan.

4. Heritage

- 4.1. Local Plan Policy D1 seeks to secure high-quality design in development that respects local context and character. Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas.
- 4.2. The application building is a grade II* listed early Georgian townhouse dating from circa 1733. It is located in Seven Dials Conservation Area. The Planning (Listed Buildings and Conservation Areas) Act 1990 says the council must have special regard to the desirability of preserving the character and appearance of the Conservation Area, and the listed building, its setting, and its special interest.
- 4.3. The special interest of the building is derived from it being a well-preserved example of an early Georgian town house which retains its original plan form, staircase and some of its original features. Some more recent changes have been made to the building such as the installation of fire doors, services and minor alterations to the plan form but these do not significantly detract from the building.
- 4.4. The building is also listed with 28 and 29 Great Queen Street and externally they appear identical except that these buildings have later shopfronts installed.
- 4.5. The character and appearance of Seven Dials Conservation Area is defined on page 11 of the conservation area statement where it says:
- 4.6. "The special character of the Conservation Area is found in the range and mix of building types and uses and the street layout. The character is not dominated by one particular period or style of building but rather it is their combination that is of special interest."
- Impact on the listed building
- 4.7. Despite having been used most recently as offices the building still maintains its original character as a dwelling house as the domestic floor plan and features have been largely survived.

- 4.8. The proposed works are sympathetic to the special interest of the listed building as they retain the maximum amount of historic fabric, floor plan and features in the building. Fabric is only replaced where it is unsound or acceptable alterations are taking place. Redundant modern services such as the air conditioning and trunking will be removed from the building.
- 4.9. The most significant alterations are as follows:
- Lower ground floor level damp-proofing. In order to address a damp problem it is proposed to install a membrane system. This is a reversible intervention laid over the existing fabric whilst also avoiding trapping in moisture.
 - It is proposed to change the existing single door between the front and rear rooms to a set of double doors. Such a feature is not uncommon in this type of building and will preserve the proportions of both spaces.
 - A bar area is to be installed within in the first-floor rear room. In principle there is no objection to this as it could read as a built-in piece of furniture. However, the arrangement of the bar and an elevation need to be provided. Details will be required by condition.
 - Each floor structure will be strengthened with the introduction of steel angles to the beams. These will not be visible once installed, do not involve the loss of historic fabric and are entirely reversible so cause no harm to the listed building.
 - It is proposed to replace one of the top floor windows due to its poor condition. The proposed replacement is like-for-like so will preserve the special interest of the building.
- 4.10. Overall, the special interest of the listed building is preserved by the works. Whilst the building is not to be returned to its original residential use, the changes to the internal décor and function will take it closer to a residential character, making it simpler to adapt to a residential use in future.

Impact on the setting of neighbouring listed buildings and the conservation area

- 4.11. Externally there is no change to the appearance of the building as the replacement window is identical to the existing. Therefore, the setting of surrounding listed buildings are preserved as their context is unchanged as is the appearance of this part of the conservation area.
- 4.12. Whilst the use of the building will change and there may be activity later into the evening than for an office, the conservation area already has a mix of uses including bars and eateries nearby. Therefore, the character and appearance of the conservation area will be preserved.
- 4.13. The proposed works to the listed building, and the change of use are appropriate and would respect the significance of the host building, the other listed buildings in the area, and conservation area, in accordance with policies D1 and D2 of the Camden Local Plan.

5. Transport

- 5.1. Policy T1 of the Local Plan seeks to promote sustainable modes of transport such as walking, cycling and public transport. Policy T2 requires all development to be car-free.
- 5.2. Policy T2 generally seeks to limit the availability of both off-street and on-street parking through legal agreements. This would prevent the business from obtaining business parking permits. However, the council only issues business permits in extenuating circumstances, where there is a demonstrable business need. The nature of the proposed use means most trips in this location are likely to be via public transport. The demand for business permits is unlikely, and in any event, there would be no demonstrable business need for a private members' club to operate motor vehicles. As such, the development would comply with policy T2 anyway and a legal agreement would be disproportionate.
- 5.3. Whilst many visitors may not use bikes, it is more likely that employees may use a bike and so covered cycle parking should be provided in accordance with Policy T1. The most relevant standards for cycle parking in the London Plan suggest the proposed use should provide 1 long-stay and 3 short-stay cycle parking spaces. Since the club mainly caters to private members it is recommended that all cycle parking spaces are provided as long-stay within the

building. There is space in the back of house areas and the basement levels to provide this, which would supplement the ability to use on street cycle parking in the area. A condition is attached to require details of 4 long-stay cycle parking spaces prior to commencement of the use.

6. Recommendation:

6.1 Grant conditional planning permission, subject to s106 legal agreement for the following Heads of Terms:

- Local employment and supply opportunities
- Employment and Training contribution of £120,000
- School and community rehearsal space

6.2 Grant conditional listed building consent.

7. Conditions (planning permission):

Time period

The development hereby permitted must be begun no later than three years from the date of this decision notice.

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

Drawings and documents

The development hereby permitted shall be carried out in accordance with the following approved drawings and documents:

Application form dated 04/03/2022; Location plan 01 Feb 2022; 27GQS.MP01 rev A; 27GQS.MP02 Rev B; 401_T_rev 01; Background to The Savage Club letter dated Jan 2022; Heritage Assessment (HCUK Group) Feb 2022; Estate agent letter (Gale Progen and Co) dated 21/10/2021; Noise Assessment (R9472-1 Rev 0) dated 28 Feb 2022; Planning and Design & Access Statement dated March 2022; Letters from PJB Planning dated 20/06/2022, and 15/09/2022; Rehearsal space plan 401 Rev 01.

Reason:

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

Cycle storage details to be submitted

Prior to the occupation of the development hereby permitted, details of cycle parking for four bikes shall be submitted to and approved in writing by the Local Planning Authority. The cycle parking shall thereafter be implemented in accordance with the approved details before the use hereby permitted commences and shall thereafter be retained for its designated use.

Reason: To ensure adequate cycle parking is available on site and promote sustainable modes of transport T1 of the Camden Local Plan 2017.

Use times (general hours of operation)

The use of the premises hereby permitted shall not operate other than within the following times:

Monday to Friday - 07:30 to 01:30 the following day

Saturday, Sunday and Bank Holidays - 12:00 to 23:00

Reason: To safeguard the amenity of the adjoining premises and the area generally in accordance with policies A1 and A4 of the London Borough of Camden Local Plan 2017.

No late hours without a Management plan

The use shall not operate between 23:30 (11:30 pm) and 01:30 (1:30 am) the following day, unless a Management Plan has been submitted to and approved in writing by the local planning authority. The use shall thereafter be operated during those hours in full accordance with the approved Management Plan. The submitted details shall include all the following:

- a) how the club will manage numbers/capacity,
- b) mitigation measures to manage noise and disturbance within and outside the club, and
- c) measures to manage dispersal from the club upon closure.

Reason: To secure additional mitigation and management of late night operation of the use in order to safeguard the amenity of the adjoining premises and the area generally in accordance with policies A1 and A4 of the Camden Local Plan 2017.

Delivery and servicing times

There shall be no deliveries to or from the development hereby permitted other than between 8am and 8pm on any day.

Reason: To safeguard the amenity of the adjoining premises and the area generally in accordance with policies A1 and A4 of the Camden Local Plan 2017.

Noise levels

The external noise levels emitted from the use at the site, including plant, machinery or equipment at the site, shall be lower than the lowest existing background noise level by at least 10dBA, or by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest noise sensitive premises, with the use and all machinery and operating together at maximum capacity.

Reason: To protect the amenity of the surrounding premises and the area generally in accordance with policies A1 and A4 of the Camden Local Plan 2017.

Roof lights to be kept shut during rehearsals

The rooflights of the rehearsal space in the rear projection to the site, shown hatched on Rehearsal space plan 401 Rev 01, must remain shut when the space is occupied for rehearsals or music performance.

Reason: To protect the amenity of the surrounding premises and the area generally in accordance with policies A1 and A4 of the Camden Local Plan 2017.

No audible music

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

Reason: To protect the amenity of the surrounding premises and the area generally in accordance with policies A1 and A4 of the Camden Local Plan 2017.

8. Conditions (listed building consent):

Time period

The works hereby permitted shall be begun not later than the end of three years from the date of this consent.

Reason: In order to comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Drawings and documents

The works hereby permitted shall be carried out in accordance with details and methodologies set out in the following approved drawings and documents:

Application form dated 04/03/2022; Location plan 01 dated Feb 2022; 27GQS.MP01 rev A; 27GQS.MP02 Rev B; 401_T_rev 01; Heritage Assessment (HCUK Group) Feb 2022; Heritage Impact Assessment (HCUK Group) Jul 2022; Planning and Design & Access Statement dated March 2022; Letters from PJB Planning dated 20/06/2022, 14/07/2022, and 15/09/2022; Rehearsal space plan 401 Rev 01; Visual Structural Inspection (1073.nhg dated 31 May 2022); Condition survey of existing building (34030 dated 3rd March 2022); Finishes and Colour Schedule (dated 06/07/2022 Rev 0); Delta Membrane Systems information sheet MS500; Delta Membrane Systems information sheet MS20; General Conditions Specification (labelled Internal and External Refurbishment Works, Section 4: General Conditions); Internal Works Specification (labelled Internal and External Refurbishment Works, Section 5: Internal Works); External Works Specification (labelled Internal and External Refurbishment Works, Section 6: External Works); Specialist Works Specification (labelled Internal and External Refurbishment Works, Section 7: Specialist Works); DW-123-1-(C) rev 1; 300-PL-rev 01; 301-PL-rev 01; 302-PL-rev 01; 303-PL-rev 01; 304-PL-rev 01; 305-PL-rev 01; 100-D-rev 01; 101-D-rev 01; 102-D-rev 01.

Reason: To safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

New works to match existing

All new work and work of making good shall be carried out to match the existing adjacent work as closely as possible in materials and detailed execution.

Reason: To safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

Details of the bar

Prior to the installation of the bar in the first-floor rear room, details of the arrangement of the bar at a scale of 1:20, including materiality, elevations and fixings, shall be submitted to and approved in writing by the local planning authority. The bar shall thereafter be installed in accordance with the approved details.

Reason: To safeguard the special architectural and historic interest of the building, and the building fabric, in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

The decision to refer an application to Planning Committee lies with the Director of Regeneration and Planning. Following the Members Briefing panel on Tuesday 2 April 2024, nominated members will advise whether they consider this application should be reported to the Planning Committee. For further information, please go to www.camden.gov.uk and search for 'Members Briefing'