

Tabled Paper for Planning Committee

27 February 2025

Agenda Item: 6
Application Numbers: 2024/2450/P
Address: 151 Shaftesbury Avenue, London, WC2H 8AL

Amendments and clarifications to the officer report.

Where relevant, deletions are ~~struck-through~~ and new text is underlined.

1. Analysis information

Correction to existing cycle parking details

Parking details				
Type	Existing spaces	Proposed long stay	Proposed short stay	Difference
Car parking	7	0	0	-7
Cycle parking (non-residential)	0 <u>18</u>	137	0	+137 <u>+119</u>

2. Proposed office use

Correction to paragraph 7.8: The existing building is currently 50% let, not fully vacant as reported.

7.8 The proposals involve the intensification and improvement of the existing employment use with the refurbishment and extension of the existing building to provide high quality, flexible and adaptable office floorspace which would be able to cater for future changes in demand. The existing office floorspace is currently 50% vacant, with the building due to be fully vacant before the anticipated start of construction works, in November 2026. There are four remaining tenants, one of which has alternative accommodation secured, two of which the applicant is in active discussions with to accommodate them elsewhere in their portfolio, and one with a short term lease which expires in April 2026.

As such, there would be no impact on existing businesses and occupiers.

3. Impact on neighbouring amenity

Daylight and Sunlight

Corrections to report and minor clarifications of wording

Pendrell House

9.13 The results of the NSL test show that 17 rooms would see losses greater than 20%. Seven of these would see losses between 0.7 – 0.79 times their former value (noticeable but low impact) and six would see losses between 0.6 – 0.69 times their former value (medium impact). In the existing condition, these rooms are all below the BRE recommendation of 80% (with all existing scores between 17-36% 43%). The remaining four rooms would see greater reductions of 0.41, 0.06, 0.55 and 0.37 times their former value. Their existing and proposed values are shown below (80% NSL is a good level of daylight):

9.15 As to the impacts on sunlight, the APSH test showed that ~~40~~ 11 of the 40 rooms tested would not meet the BRE recommendations, with losses ~~greater than 0.8 times their former value~~ greater than 20% / less than 0.8 times their former value. The greatest impacts are to ~~5~~ 6 rooms at ground and first floor as shown below. At second floor and above, the rooms would see only a low impact to their annual APSH levels. Two living rooms would see a medium and high impact respectively to winter sunlight only.

	Annual % APSH			Winter % APSH		
	Existing %APSH	Proposed %APSH	Pr/Ex ratio	Existing %APSH	Proposed %APSH	Pr/Ex ratio
1. GF bed	19	13	0.68	3	2	0.67
2. GF bed	16	9	0.56	2	1	0.50
3. 1F bed	20	14	0.70	3	2	0.67
4. 1F bed	16	10	0.63	2	0	0.00
5. 1F bed	10	2	0.20	3	0	0.00
6. 2F 1F living	26	20	0.77	6	3	0.50
7. 2F bed	27	20	0.74	7	5	NA (complies)

8. 2F living	30	25	NA (complies)	6	4	0.67
9. 3F bed	31	24	0.77	8	7	NA (complies)
10. 3F bed	31	22	0.71	8	6	NA (complies)
<u>11. 3F Living</u>	<u>35</u>	<u>30</u>	<u>NA (complies)</u>	<u>7</u>	<u>4</u>	<u>0.57</u>

9.17 It is noted that all rooms which fail the APSH test for sunlight, would see a negligible / noticeable but low impact to their VSC and NSL levels, with one medium impact on NSL, with the greatest reduction being a loss of ~~0.7~~ 0.67 times its former value. As to the room highlighted in the image above, the existing VSC would be reduced from 6.8 to 5.2% (0.76 times its former value – noticeable but low impact), and the NSL would be reduced from 20% to 19% (0.95 times its former value – not noticeable).

These amendments pick up minor inaccuracies in the report. The number of rooms not meeting the APSH recommendations is 11, not 10. The 11th room has been included at the bottom of the table. These changes do not alter the overall assessment or conclusion that impacts to neighbouring daylight are acceptable.

166 – 170 Shaftesbury Avenue (residential)

9.30 The results showed that all windows tested would meet BRE guidelines for VSC following the development. One room would see a loss to NSL of 0.67 times its former value which is ~~greater than the BRE target of 0.8~~ greater than the BRE target of 20% / less than 0.8 times its former value. The room in question has an existing NSL value of 14% - well below the BRE recommendation of 80% - which would be reduced to 10% in the proposed condition. Although the percentage loss would be greater than ~~0.8 times its former value~~ 20%, in reality, the loss would be unlikely to be significant. Furthermore, given the VSC score for this room would meet the BRE recommendations (0.85), the loss of NSL is considered acceptable.

9.31 As none of the windows at this site face within 90 degrees of due south, the APSH test was not required.

166a Shaftesbury Avenue (church)

9.36 Only two rooms have windows that face within 90 degrees of due south, and both would not see any losses in sunlight and therefore meet the BRE recommended targets for APSH.

These amendments make minor corrections / clarifications to the wording.

4. Conditions

Change to condition 18

Condition 18: Unit 1 controls

Access and egress to the Sui Generis/Class E unit shown as 'Unit 1' on drawing no. 1232_PL-GA-00 P1 by customers and staff shall only be via Shaftesbury Avenue and all windows to the New Compton Street elevation shall be fixed shut at all times. The bifold windows shown on drawing no.1232_PL-GE-02 P1 to St Giles Passage shall be fixed shut after 22:00 Monday to Sunday.

Reason: To ensure that the use of the unit does not adversely affect the amenity of the adjoining premises or immediate area by way of noise and disturbance, in accordance with policies G1, A1 and A4 of the Camden Local Plan 2017.

The applicant has confirmed that the majority of the time access by staff shall be via Shaftesbury Avenue, but there will be instances such as opening and locking up, where staff to unit 1 would need to enter or leave via the New Compton Street entrance. The reason for this condition is to prevent large volumes of people coming and going from the rear entrance to avoid undue noise and disturbance to neighbours. The proposed amendment to allow staff members to leave via the rear entrance would still ensure that the vast majority of people would access the site via Shaftesbury Avenue and as such there is no objection to the proposed amendment.

Change to conditions 7 and 8

Condition 7: SuDS: Further details

Prior to commencement of construction of proposed roof extensions, ~~commencement of above-ground works (excluding deconstruction and site clearance)~~, full details of the sustainable drainage system including at least 24.52m³ of blue roof and consideration of additional blue roof capacity shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water, or on any part of the entire development site for up to and including a 1:30 year storm. The details shall demonstrate a site run-off rate conforming to the greenfield run-off rate or other rate of no more than 31.85l/s for a 1 in 100 year plus 40% for climate change approved by the Local Planning Authority. An up to date drainage statement, SuDS pro-forma, a lifetime maintenance plan and supporting evidence should be provided including:

- Consideration of additional blue roof or other attenuation capacity to reduce the run off to as close to greenfield run off rate as possible
- The proposed SuDS or drainage measures including storage capacities
- The proposed surface water discharge rates or volumes
- Exceedances routes are provided and risks to people and property are minimised as far as possible
- Mitigation measures to protect the development against surface water flood risk.

Systems shall thereafter implemented in accordance with the approved details.

Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the Camden Local Plan 2017 and Policy SI 13 of the London Plan 2021.

Condition 8: Blue / green roof details

Prior to commencement of construction of proposed roof extensions ~~commencement of above-ground development (excluding deconstruction and site clearance)~~, full details in respect of the blue/ green roof in the area indicated on the approved roof plan shall be submitted to and approved by the local planning authority. Details of the blue/green roof provided shall include: catchment area, storage volume, drainage rate, species, planting density, substrate and a section at scale 1:20 showing that adequate depth (expected to be at least 150mm for substrate) is available in terms of the construction and long term viability of the green roof, as well as details of the maintenance programme for green/blue roof. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC2 and CC3 of the Camden Local Plan 2017.

The applicant has requested a change to the trigger for these conditions as the details are dependent on the appointment of a variety of subcontractors which are often not appointed pre-commencement. It is proposed to change the trigger for the submission of information so that it is required prior to the construction of the proposed roof extensions where the blue/green roofs would be located, which is acceptable.

These amendments do not alter the recommendation made by officers in the committee report.

ENDS