

BRAMBLEWELL LTD

**CHARLOTTE HOUSE, 11-14 WINDMILL STREET,
LONDON**

PLANNING STATEMENT

DECEMBER 2012

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Date of Issue: December 2012

1. Introduction

- 1.1 This Planning Statement is written in support of a full planning application to refurbish and extend the property known as 11-14 Windmill Street (Charlotte House). The building is in office use (Class B1) and comprises some 2,983 sq m (GIA) arranged over five floors (excluding the lower ground).

- 1.2 The proposed development is for the:

“External alterations to the ground floor front facade, replacement 4th floor and erection of 5th floor extension (to no. 11-3), replacement of roof top plant room with new 5th floor (no.14); new windows to east elevation; replacement external plant at second floor; additional fire escape between 4th and 5th floor; and associated works.”

- 1.3 The offices were designed and built to 1980s standards and are now outdated and proving unattractive to the London office market. The offices have gradually become vacant since September 2010 whereby the previous tenants have relocated to better accommodation. It is apparent that the Grade B office space, due to its age, design, condition and constraints has become unable to meet the needs of modern businesses and as such is unattractive to prospective occupiers.
- 1.4 There is a significant amount of Grade B space available locally and such, this type of office space has a tendency to remain vacant for on average 18 months and often longer. Having recently purchased the property, the new owners (applicants) are keen to overhaul the building and let it as quickly as possible. Simply undertaking minor refurbishment works and maintaining it as Grade B space is not a viable option as there is significant competition from other office space locally. As such, the intention is to fully upgrade the space to meet Grade A office standards which is known to be in demand.
- 1.5 The new owners propose the complete refurbishment of the office space as soon as possible. To aid the letting of the space, the design is pitched to specifically appeal to the dominant sectors in this part of London, namely the fashion and media sectors. Notwithstanding, the proposed space will be attractive for any occupier seeking high quality office space.
- 1.6 Whereas a recent application (LPA ref: 2011/1726/P) proposed the refurbishment of the building with the introduction of some residential space, this approach has been discounted by the new owners, instead focusing on the building's potential to provide high quality office space. However, to make the refurbishment works viable and to make the building of a size, layout and flexibility attractive to occupiers, an

uplift in the available office floor area is required. This is the driving rationale for the roof extension and the improvements to the front facade.

The Structure of this Statement

- 1.7 Section Two provides a description of the site and surrounding area having regard to land use designations indicated on the adopted Proposals Map (Core Strategy 2010).
- 1.8 Section Three outlines the most relevant planning history for the site and in particular considers the recently refused application (ref: 2011/1726/P).
- 1.9 Section Four provides a detailed description of the proposed development, highlighting the key changes to the building, both internally and externally.
- 1.10 Section Five sets out the planning policy framework against which the application should be assessed, focussing particularly on those policies which promote the increase and improvement of office space.
- 1.11 Section Six then assesses the proposals against the policy considerations, including the merits of the design and the development's environmental improvement works.
- 1.12 Section Seven then summarises the key points made and concludes the Statement.

Supporting Information

- 1.13 To illustrate the proposed development and to support the application, this Statement should be read alongside the following plans and documents:
 - Existing and proposed plans - ORMS Architecture Design;
 - Design & Access Statement – ORMS Architecture Design;
 - Heritage Assessment – Turley Associates;
 - Daylight & Sunlight Study – Delva Patman Redler; and
 - Background Noise Assessment – Lee Cunningham Partnership;

2. The Application Site and Surrounding Area

- 2.1 The application site comprises 11-14 Windmill Street (Charlotte House), an office building (Class B1) designed in 1989 by Andrew Downie & Partners, in a Neo-Georgian style. It is located on the south side of Windmill St, opposite the junction with Whitfield Street and equidistant between Charlotte Street to the west and Tottenham Court Road to the east.
- 2.2 The buildings can be split into two discernible parts: No.11-13 comprising three storeys and a fourth storey mansard (plus a basement level) and No.14 Windmill St arranged over five floors (plus a basement level). The fifth floor is set behind a pediment and currently provides space for plant equipment.
- 2.3 The ground floor of No.11-13 is set back from the street by 2m, separated by a light well (also providing external access to the basement) and railings. The office area is set back behind a stone colonnade. No.14 fronts the street and is stone clad at ground floor level. Access to the building (No.11-14) is provided here by a single entrance doorway.
- 2.4 No.14 acts a “book end” to the both the building and the other buildings on the street. This element of the building forms the entrance to Windmill Street and the termination of the view from Whitfield Street. It addresses Windmill Street and the eastern flank wall presents only a single line of windows, located centrally in the facade, one per floor.
- 2.5 The building covers the full extent of the property’s demise and to the south, the building faces the rear of buildings on Percy Street (No.27-30), which are in a mixture of uses, including residential at the upper floors.
- 2.6 For the purposes of applying planning policy, the site is within the Charlotte Street Conservation Area (but is not listed) and is within a commercial and protected retail frontage, as identified within the Supplementary Planning Guidance for Central London.

Surrounding Area

- 2.7 Immediately east of the site is the Met building which provides over 14 floors of office accommodation (including basement). To the west, on both sides of Windmill Street are four storey buildings characterised by ground floor retail units primarily occupied by independent traders. As such, the shop fronts are not uniform and are designed individually, using both modern and traditional styles and materials. This adds to the visual quality of the area.

- 2.8 To the rear, properties on Percy Street are in close proximity to the site. These buildings appear in a mixture of uses but include a number of residential dwellings to the upper floors. In particular, No.27 - 30 Percy St are immediately opposite (behind) the application site. Notably, No.28 has terraces at the 2nd and 3rd floor roof level.
- 2.9 More widely, Charlotte Street to the west is characterised by shops and restaurants at the ground floor with a mixture of uses above including offices and residential. To the east is Tottenham Court Road which is defined as Central London Frontage by the Proposals Map and to the north, Goodge Street is classed as a Neighbourhood Centre. Both of these roads feature buildings of at least four storeys but in some cases, taller. All of these streets are within the Conservation Area.

3. Relevant Planning History

- 3.1 On 19th May 1989, application ref. 8800356/R3 was granted for the redevelopment of the site at 9-14 Windmill St to provide a five storey and basement building, comprising office (2,958 sq m), retail 187 sq m) and ten residential flats including the provision of underground parking.

- 3.2 On 27th February 2012, application ref. 2011/1726/P was refused for the:

“extension and alterations to existing office building (Class B1) including change of use of upper floors to 16 residential flats (3x1 bed, 8x2 bed and 5x3 bed), flexible use of basement and ground floor as either offices (Class B1a) or offices (Class b1a) and retail (Class A1); erection off new fourth and fifth floor (following removal of existing mansard) on No.11-13 and sixth floor on No.14; rear extension at second and third floor level; extension into and over part of the front lightwell at basement and ground floor level; remodelling of elevation; and creation of roof terrace on upper floor levels.”

- 3.3 The application was determined at Planning Committee on 23rd February 2012 whereby Members resolved to refuse permission for the following single reason:

“The proposed development would result in the loss of employment floorspace which remains suitable for use. It would fail to support economic activity in Camden particularly small and medium sized businesses and would result in the loss of employment opportunities within the Borough...”

- 3.4 The loss of employment floorspace was considered unacceptable. However, both the minutes of the Committee meeting and the Officer's report indicate that the principle of extending the roof to provide additional accommodation was acceptable, as was the proposed design and residential amenity.

- 3.5 The Conservation Area Appraisal and Management Strategy (as noted at paragraph 6.51 of the Officer's report) concluded that No.11-14 Windmill St makes a negative contribution to the Conservation Area. As such, the Officer welcomed the proposed design which addressed the “squat” proportions of the ground floor plinth and redesigned the proportions of the upper floors. The Officer concluded that:

“any potential increase in bulk perceived at roof level would be readily mitigated and result in an enhancement to the existing building and its contribution made to the character and appearance of the Conservation Area.”

- 3.6 The key design principles proposed by the application included:

- Redressing the squat proportions through the roof extension;
 - Creating “townhouse bays” to create better vertical proportions;
 - Being influenced by Queen Anne Dutch Style;
 - Reinforcing the “bookend” (No.14) landmark termination of the view from Whitfield Street; and
 - Ground floor facade improvements to the whole frontage.
- 3.7 In respect of the roof extension the Officer was content that the scale and built form of the proposed roof extensions to No.11-13 would sit comfortably within the area of built development which set the site’s context.
- 3.8 In terms of the roof extension to No.14 (to create a fifth floor) the Officer concluded that the increased height establishes No.14 as a “bookend” and reinforces the building as a landmark which terminates the view from Whitfield Street.
- 3.9 The proposal to bring forward and upgrade the front elevation with increased glazing, enlivening the street was also welcomed. Indeed the proposals to amend the facades generally, was welcomed and the Officer concluded that the proposals were of significant public benefit to the area by improving the architectural “vocabulary and proportions” of the building.

Conclusion

- 3.10 It is evident that the principle of a roof extension of similar design and proportions should be acceptable to the Council. A design solution that improves the squat proportions of the building and which emphasises No.14 as a “bookend” is desirable to the Council.
- 3.11 In terms of the other changes to the facade, there is clear support for a solution which “opens up” the ground floor, adding interest to both the building and the street. The building appears insular and it would be seen as an improvement to the Conservation Area (assuming materials and treatments are appropriate) to change the building to better address the street.
- 3.12 Finally, there is clear support for a design solution which emphasises the “townhouse” style, addressing the issues with the existing design and better articulating this style through the use of materials and physical alteration.

4. The Proposed Development

- 4.1 The proposed works are sought to provide a significant upgrade to the quality and specification of the office space, to make the building significantly more attractive to occupiers.
- 4.2 The underlying theme for the proposed changes is that they combine to create a “contemporary building with a historic twist”. In considering the proposed development it is important to consider that the existing building is a poor example of pastiche Georgian design, constructed in the 1980s. Indeed in the Officer’s consideration of the refused application to (2011/1726/P) it was confirmed as having numerous design issues such as squat proportions which should be addressed. The proposed development seeks to remedy the design issues with the building whilst simultaneously modernising it for office purposes.
- 4.3 The proposed development comprises a number of different elements at each level of accommodation. The majority of works are internal alterations and do not require planning permission and as such, unless they are significant to the project, we do not specifically outline these. Generally, the internal changes relate to the complete refurbishment and upgrading of the office space to Grade A specification. For example, the changes include the removal of internal partition walls, the upgrading and relocation of WC’s, and the improvement of all building services etc.
- 4.4 More significantly there are a number of external alterations and additions which form the basis of this application. Collectively, the internal and external alterations are critical to the delivery of a Grade A office building.
- 4.5 Importantly, to maximise the appeal of the building to prospective occupiers and to increase the flexibility of the office floor space, the ground and lower ground floors can be occupied as a self contained unit, independent from the rest of the building. Alternatively, the space can also be occupied in conjunction with the upper floors.
- 4.6 We describe the proposed works below on a floor by floor basis.

Lower Ground Floor

- Introduction of a cycle store (12 spaces – accessed by all);
- Introduction of shower rooms (accessed by all);
- New rear stair well (internal) connecting the lower ground and ground floor office space;

- New front stair well (internal) providing access to the Street and the cycle store, showers etc;
- New lifts fitted to the existing shaft, serving all floors;
- The existing partitions are removed to maximise the efficiency of the office space.

Ground Floor

- New glazed front facade to No.11-13, replacing the colonnade and opening up the front elevation to create a more inviting and attractive office space at ground floor;
- New entrance to No.11-13 provided by a central access at No.12 with recessed bays either side (No.11 and No.13);
- Replacement of railings to the front of the buildings with glass balustrades, modernising the appearance of the building whilst keeping additions “lightweight” and subtle;
- Refurbishment of light wells to maximise light to the lower ground floor;
- Lightweight link bridge is provided from the street to No.13 which enables access to the lower ground communal areas (cycle stores, showers etc);
- Lightweight link bridge to No.12 to provide a separate access to the ground floor office space, enabling use independent from the rest of the building;
- Lightweight link bridge to No.11 to provide means of fire escape; and
- For No.14, replacement of the stone clad entrance and single narrow doorway with a full width glazed facade to enable is proposed, creating an inviting reception area which is visible from the street.

1st Floor

4.7 Changes to this floor are limited to:

- The replacement of all windows on a “like for like” basis with modern energy efficient units;

- The provision of two additional window openings on the east gable end, facing the Met Building. These are located either side of the single central column of windows and will provide light to the toilets and office space;

4.8 These alterations are repeated for floors 2-4 so are not set out again below.

Second Floor

- Relocation of existing plant to a new double storey plant enclosure, obscured from view by acoustic louvre screen;

3rd Floor

4.9 Aside from those changes stated above which are repeated for each floor, the only other change proposed is to block off the fire escape to the adjacent building. This is an internal change. The fire escape is then to be replaced by an external lightweight fire escape staircase which connects the third, fourth and fifth floors.

4th and 5th Floors

- 4.10 The majority of the external alterations occur at the fourth and fifth floor levels. The works and design rationale behind these are explained in detail in the Design & Access Statement but are summarised below.
- 4.11 No.11-13 presently terminates at the fourth floor mansard level. At No.14, the building terminates at the fifth floor. This is an attic area behind the pediment, extending the full width of the building and containing the building's plant.
- 4.12 The proposal for No.11-13 is to replace the structure of the fourth floor to facilitate the erection of a new fourth and fifth floor. The current structure will be replaced and extended from fourth to fifth floor, finished with diamond shaped metal shingles. It will be set back from the parapet edge by 580mm. At the fourth floor level, the currently angled roof will be replaced with a vertical face containing new dormer windows. The fifth floor roof will be angled away from Windmill Street to reduce its visibility in the streetscape. The roof structure will also contain recessed glazing to create the impression of three separate "townhouse" bays whilst also improving levels of daylight into the space.
- 4.13 The fifth floor extension to No.11-13 will tie into the new fifth floor level above No.14 which will provide one single unified office space. The current plant room above No.14 will be replaced by a "lantern" with dormers facing Windmill Street and the adjacent Met Building. New stairs, lifts, toilets etc will also be provided.

Overall the new floorspace will increase the quantum of office floorspace by 199 sq m (GIA).

- 4.14 A south facing roof terrace is also proposed, which will be accessed directly from the office space. Taking account of the proximity of 27-30 Percy Street to the rear, the terrace is suitably set back to avoid any direct “window to window” overlooking (more of which below). This new space is highly desirable to office occupiers and will enhance the office's attractiveness.
- 4.15 From the fourth to fifth floor levels, we propose a new external lightweight fire escape stairwell which will sit upon the existing wing which contains the internal fire escape at present.
- 4.16 Finally, to give the building more personality and to enhance the upgraded window reveals and other detailing, we propose to soot wash No.11-13 to make it “ash grey”. This element of the building will then contrast and compliment No.14 which will remain white (refreshed render) and be enhanced as a visual marker.

Pre-Application Consultation

LB Camden Council

- 4.17 The proposed design (as set out above) has evolved following pre-application discussions with Officers of Camden Council. The design was presented as being ‘a contemporary building with a historical twist’ which is an appropriate response to the surrounding streetscape and the building's current shortcomings and intended use (B1 office).
- 4.18 Whilst the principle of development was confirmed as acceptable, the Officers provided detailed feedback in respect of the design. It was highlighted that compared to current proposals, the previous application added greater levels of detail, decoration and ‘refinement’ to the ground floor and main facades in. The design of the previous application was considered to reinforce the traditional neo-Georgian language of the existing building. Both elements the Council continued to support.
- 4.19 Officers also stated that the proposed ground and facade works of the previous application helped to ‘offset’ the proposed double height roof extensions which otherwise are generally resisted by the Council. The public benefit of the ground floor alterations remains a key consideration.

- 4.20 To ensure the proposed scheme offered the same degree of detail as the recently refused scheme, the following amendments were suggested:

Ground Floor facade

- No.11-13: Consider infilling lightwell; and
- No. 14: Provide more solidity.

Roofscape

- No. 11-13 : reinforce the three bays by pushing the slot glass windows further back and recessing them to a greater level; and
- No. 14: Articulate the corner building as a marker from both Whitfield Street and Tottenham Court Road. Reconsider the glass dormer and create more solidity and note that increased height is required to create true landmark building.

Facade

- Consider soot washing to 'lift' the facade and provide contrast against the corner marker whilst improving the building's overall visual quality.

- 4.21 We have continued discussions with Officers to refine the design, in particular, the massing and detailing of the new roofs. We have reviewed and considered all the points raised and have accommodated these elements into our current design wherever possible and as such, the proposals should now have Officer support.

Other Stakeholder Consultation

- 4.22 As part of design process we have sought to discuss the proposals with the following stakeholders:

- Residents of No 10 Windmill Street
- Residents of Percy Street
- Councillor Adam Harrison
- The Bloomsbury Conservation Area Advisory Committee
- The Charlotte Street Association

- 4.23 It has not been possible to meet with all of the stakeholders and in such cases we have sought their views via email and telephone conversation.
- 4.24 Views on the proposed development have been mixed and where appropriate we have sought to amend the scheme in light of stakeholder's suggestions. For example, at the fifth floor terrace we have introduced an obscure glazed balustrade (1300mm high) and set a hand rail 250mm in board to prevent people standing at the edge of the terrace. This restricts direct overlooking of the Percy Street properties to the rear.
- 4.25 In summary we have sought the opinion of the key local stakeholders and sought to address legitimate concerns where possible. We will continue to hold a dialogue with these groups throughout the course of the application.

5. Relevant Planning Policy

5.1 This Section sets out the relevant planning policy framework against which the application should be assessed. The Development Plan relevant to development at Windmill St is:

- The National Planning Policy Framework (2012)
- The London Plan (2011)
- The Camden Core Strategy (2010)
- Camden Development Policies (2010)

5.2 Whilst they do not form part of the Statutory Development Plan, Camden has adopted a series of Supplementary Planning Statements (Camden Planning Guidance) to provide additional details on topics such as sustainability, transport and design. We reference these where appropriate within the Planning Considerations but do not consider them in full within this Section.

5.3 For the purposes of applying planning policy the site is within the Charlotte Street Conservation Area but is not covered by any other land use designation. The site is within Central London Area but is not within a Central London Frontage.

National Planning Policy Framework (NPPF – March 2012)

5.4 The NPPF, published in March 2012, supersedes the large majority of national planning policy and guidance. As such, it is the principal document against which to assess applications for development in respect of national policy objectives.

Supporting Economic Growth

5.5 The NPPF makes clear that securing economic growth and the creation of jobs are considerations to be given significant weight in decision making (paragraphs 18 and 19). Creating economic growth is the priority for the UK Government and the planning system is a key tool to support this. Planning is intended to encourage and not act as an impediment to sustainable growth.

Presumption in Favour of Sustainable Development

5.6 At the heart of the NPPF is the presumption in favour of sustainable development. Sustainable development has three dimensions; those being economic, social and

environmental. These three elements should be achieved jointly and simultaneously and where this is demonstrable, development should be approved without delay.

Building a Strong, Competitive Economy

- 5.7 The priority for the UK Government is the creation of jobs and sustainable economic growth. The application proposes to refurbish existing office space to upgrade it to Grade A space, the most attractive to businesses. The scheme also seeks to provide additional floorspace to maximise the amount space provided on the site. It is clear that such development accords with the thrust of policy objectives.
- 5.8 The wording of the NPPF requires planning authorities to approach applications for economic development proactively. Specifically, paragraph 20 highlights the importance of supporting development which establishes an economy fit for the 21st Century. The building has been vacant for some time and requires a significant upgrade in order to secure a new occupier. The building is at present, not suitable for modern business purposes and the proposals seek to remedy this. As such, the proposals accord with the objectives of the NPPF i.e. it increases office floorspace and maximises opportunities for businesses to relocate and expand. This is economic development.

The London Plan (2011)

- 5.9 The application proposals are not of a scale or level of significance that requires an in depth assessment of the London Plan policies. However, it should be noted that Policy 4.1 and 4.2 encourage office development and in particular within the Central Activities Zone (which includes Windmill Street), Policy 4.2 specifically encourages the refurbishment of existing office stock.
- 5.10 Policies within Chapter 5 of the Plan encourage sustainable development and support developments which minimise energy usage, carbon emissions and general wastage. Walking and cycling and the use of public transport are encouraged by the Plan.

The Camden Core Strategy (2010)

- 5.11 The application site is close to the Tottenham Court Road Growth Area (Policy CS1) which is highlighted as an area to focus an increase in housing and

encourage greater job creation. Policy CS2 indicates that the growth area should support up to 5,000 new jobs up to 2026.

- 5.12 Beyond these growth areas, Policy CS3 promotes the most efficient use of land and encourages development to make full use of site, whilst providing a high quality design which takes account of the character of the surrounding area and minimises impact upon amenity. The Council also encourages development to be sustainable and accessible by public transport. Office uses in these locations are supported. Policy CS5 reiterates these requirements.
- 5.13 It is clear that the proposed development which seeks to increase the office floorspace provided on the site whilst significantly upgrading the energy efficiency of the buildings, accords with the thrust of these policy objectives.
- 5.14 To further support the growth of jobs in Camden, Policy CS8 seeks to safeguard existing employment sites and premises. The Council supports the retention and provision of premises which meet the needs of modern business and in particular, premises which meet the needs of small and medium sized businesses. No loss of office floor space is proposed but the proposals will meet the underlying objective of this policy to maximise the amount of floorspace available and particularly for small and medium size businesses.
- 5.15 Whilst policy encourages development to meet the needs of the Borough over the plan period, supporting office development in areas such as Windmill Street, the Core Strategy sets out through policies including CS11, CS13 and CS18 measures to be taken to increase the sustainability of development.
- 5.16 In respect of transport, development is encouraged to promote walking and cycling as an important means of reducing traffic on the roads and improving air quality locally. CS13 in particular, encourages development which maximises the use of land and minimises the use of resources and production of carbon emissions. Again, the proposed development meets these objectives as a significant amount of work proposed relates to the upgrading of building services and utilities.

Camden Development Policies (2010)

- 5.17 Policy CS13 seeks to retain employment uses and provides protection for them. This is to ensure that there is a suitable supply of quality offices (and other employment sites) available to businesses. The underlying reasons for such a policy is to encourage economic development and protect the existing employment base. Conversely, it is apparent that the Council will encourage the refurbishment

of existing and the development of additional Grade A office space to meet demand.

- 5.18 Reiterating the requirements of the Core Strategy, Development Policy DP16 and DP17 promote development that encourages walking, cycling and the use of public transport. Development should make suitable provision for pedestrians, cyclists and public transport. The provision of covered, secured and safe cycle parking is encouraged.
- 5.19 Securing high quality design is of key importance. Policy DP24 requires development to be of the highest standard and to take account of its context, surroundings and the scale and proportions of neighbouring buildings. The Council encourages development to introduce active and interesting street frontages, use quality materials and which amongst other things, locate plant and services in appropriate locations taking account of impact upon on amenity. Policy DP26 reiterates this and encourages development that does not have a harmful impact upon the quality of life for neighbouring occupiers.
- 5.20 Building upon this DP25 provides protection for the Borough's heritage assets and requires development to preserve and enhance the character and appearance of the area.

Policy Summary

- 5.21 Policy at the national, regional and local level all encourage:
- Development that maximises the use of a site;
 - Development of new office floor space to meet demand (particularly in the Central London Area);
 - Development that refurbishes existing office stock to maximise the provision of new floorspace and improve the efficiency of existing;
 - Development that is well designed, using quality materials and that is in keeping with its surroundings, being respectful of neighbouring uses and minimising undue impact on amenity;
 - Sustainable development that minimises the use of energy and the production of carbon emissions; and
 - Development in sustainable locations that is accessible by walking, cycling and public transport; minimising the use of private motor vehicle.

6. Planning Considerations

The Rationale for the Proposed Development

- 6.1 The driving rationale for the development is to improve and maximise the level of office floorspace available in the building. This area of Central London has a vibrant office market, for the right kind of office building and there are strong levels of activity within the media and fashion sectors. There is demand for Grade A space and the proposed development through comprehensive refurbishment, upgrading and extension seeks to meet this demand.
- 6.2 The building is currently Grade B space and is in need of a significant upgrade in order to attract new tenants. Part of the upgrade includes configuring the building so that it can be let, either in part (ground and lower ground floors) or in full. This will make the building more attractive to occupiers and will encourage smaller businesses to take space, whereas in its current configuration this would not be easily achievable.
- 6.3 In order to make the building more attractive to occupiers, the new specification includes new cycle parking and shower facilities at the lower ground level. These are accessible to all. This is an important requirement of any tenant and encourages staff to cycle to work.
- 6.4 The building offers the opportunity to introduce a roof terrace at fifth floor level. This feature would be popular with office occupiers as it provides an extra space for workers to enjoy. As such, the proposed space is considered to improve the quality of “work life” and will increase the attractiveness of the office to prospective occupiers.

The Principle of the Proposed Office Development

- 6.5 The existing use of the building is B1 (a) offices, providing some 3,265 sq m (GEA) set over six floors, including the lower ground. The proposed development seeks to increase the amount of office floorspace offered by the building and to provide a significant upgrade in the quality of the office accommodation. Neither loss of office floorspace, nor change of use is proposed. The development seeks only to enhance and add to the existing office floorspace, in full accordance with Camden’s policies.
- 6.6 To achieve the increased office floorspace, the replacement of the existing fourth floor above No.11-13 is proposed, along with a new fifth floor office level. The

existing fifth floor above No.14 (which currently contains the plant for the building) will be replaced by a new floor of office accommodation which will be integrated with the new fifth floor at No.11-13. Together with general refurbishment works and other internal alterations, the proposed development will increase the office floorspace to 3,182 sq m (GIA), an uplift of 199 sq m.

- 6.7 National, regional and local level policies all support the provision of office space in the most sustainable and accessible locations. The site is within the Central London Area (also within the Central Activities Zone), a short distance from Tottenham Court Road Growth Area. Within such areas, there is strong policy support for office development, particularly where this is of a size and scale suitable to meet the demands of small and medium sized businesses.
- 6.8 There is also support for development that upgrades existing office stock, including improvements to the energy efficiency and sustainability of premises. The improvement of existing stock is a sustainable means of providing new office space to support London's economic development.
- 6.9 Taking the above considerations into account, it is clear that the proposal to increase and improve office floorspace at the site is in full accordance with policy, ensuring the principle of development is acceptable.

Acceptability of the Proposed Design

- 6.10 This Section focuses upon the acceptability of the design in general terms and draws comparisons with the previous proposals to extend the building and introduce residential units to the site.
- 6.11 The details of the proposed design, along with the rationale for it, are discussed in depth within the Design & Access Statement and the supporting Heritage Assessment.

The Front Elevation – Ground Floor

- 6.12 The case officer dealing with the recently refused scheme (ref: 2011/1726/P) identified that presently No.11-14 Windmill Street negatively impacts upon the appearance of the conservation area. In their assessment of the application the Officer stated:

“the neo-classical building benefits from being divided vertically to give the impression of townhouses. However, the facades lack the architectural composition finesse, detailing and quality of finish of classical terrace properties.

The detailed architectural treatment of the elevations including proportions, character, craftsmanship and roof form is missing. The scale of the ground floor is ill-proportioned, unduly squat and unwelcoming, creating a dead street frontage.”

- 6.13 As such, the proposals to improve the front facade and appearance of the building and by consequence, the appearance of the Conservation Area, were welcomed.
- 6.14 The recent application (ref: 2011/1726/P) sought to make significant changes to the ground floor elevation, including alterations to the main entrance to improve its appearance. This involved the introduction of two additional door detail either side of the main entrance to enliven the entrance and creating a more welcoming access. At No.11-13, the proposal introduced greater levels of glazing, bringing the frontages closer to the street. The colonnades were retained along with the railings but the proposed materials provided an upgrade to the appearance of the ground floor.
- 6.15 The Council considered that such changes were to *“be of significant public benefit to the area by improving the architectural vocabulary and proportions of the building.”*
- 6.16 Building upon this approach and taking account of the Officer's support for the previous proposals, the scheme architect's have developed this design idea further. The proposal is to unify the reading of the ground floor (No. 11-14) by using a single palette of details and materials.
- 6.17 It is proposed to replace the facade to ground and lower ground floor to No.11-14 with a floor to floor glazing system. This will improve the visual appearance of the building, updating it and making it feel more accessible. Direct access to the ground floor unit will be via a central entrance (No.12) which is to be brought forward to the street, with recessed bays either side (No.11 & 13). Access to the lower ground floor communal areas (cycle storage and showers etc) will be via a lightweight bridge (No.13). This is a significant improvement to the existing situation which appears insular and divorced from the street.
- 6.18 The proposed entrance to No.12 reflects the advice received from Camden's Officers who were keen to bring to the ground floor frontage to the street edge where possible. The bays provided to No.11 & 13 are designed to enable maximum light to the lower ground floor space whilst also facilitating access to the UKPN substation located beneath the pavement outside No.13.
- 6.19 The existing stone colonnade will be replaced to enhance the proportion of its reading and visually align with a new colonnade to No.14. Whilst the stone

colonnade will continue across the facade of No.14 the architects have separated the reading of the two buildings by introducing a shadow gap. The appearance of the ground floor is improved by the introduction of a larger opening that contains two oriel windows arranged symmetrically, either side of a new recessed entrance. The windows continue the line of windows for the floors above, down to ground level. Furthermore it is to be set within a metal surround which brightens the façade at street level and adds visual and architectural quality to the frontage. This design retains the neo classical principles set by the existing building but improves, opens up and modernises the appearance of the building.

- 6.20 The entrance is currently closed, insular and unwelcoming which is particularly unattractive to prospective occupiers. The proposed design meets the aspirations of office occupiers and conveys the right “message” to visitors. The new entrance is modern, functional, welcoming and provides activity to the street. As such, the proposed changes are considered an improvement on both the existing and the recently considered scheme.
- 6.21 The amendments should not be viewed in isolation and should be considered in the context of the more wholesale changes to the rest of the building, particularly at roof level. Collectively these changes provide a significant enhancement to a tired building, helping to re-establish the building’s character as a modern building with historical details.
- 6.22 The proposed design whilst similar to the recently refused scheme, is actually a better solution for the ground floor frontage and should again benefit from Officer support. Development Plan policies require development to incorporate high quality materials, address the street, respect the character of the surrounding area and generally improve the visual appearance of an area. The proposed changes to the ground floor meet all of these criteria.

Roof Extension

- 6.23 The recently considered scheme proposed roof additions of significantly greater height and indeed mass in comparison to the current proposal. Nonetheless these additions received officer support.
- 6.24 We recognise that Officers were particularly supportive of the use of three two storey pavilions designed in a Queen Anne Dutch Style to replace the mansard and in effect, break up the roofscape into three discernible parts. This had the effect of creating three “townhouse” elements which improved the reading of the building from the Conservation Area. The extensions were proposed to be set back

so as to remain subordinate to the original building and to reduce their visual prominence.

- 6.25 It is important to note that the previous scheme was designed to include residential units and this was a major consideration in design. Policy requires design to reflect and be appropriate to the proposed use which, in this case, is for office purposes. However, the architect's have sought to incorporate elements of the design which was previously supported by Officers and build upon these where possible. Pages 29 & 30 of the supporting Design & Access Statement provides cross sections which compare the recently refused scheme with that now proposed and we set out the key differences out below.
- 6.26 In contrast to the refused scheme, the current proposal seeks to replace the current fourth floor and add a fifth above No. 11-13. The existing fifth floor plant room above No.14 will be replaced by a new built structure linked to the new fifth floor above no. 11-13 to provide one continuous office space. Significantly, the refused scheme also sought a sixth floor above No.14 and was some 3.4m taller than the current proposal. As such, given the Officer's previous acceptance of the taller building, the lower roof should also be considered acceptable.
- 6.27 In terms of massing, it is clear that the proposed roof extension now provides a significant reduction to that which was previously supported by Officers. Particularly when viewed from Windmill Street, the massing is considerably reduced in comparison to the previously proposed Queen Anne Dutch style dormers and pitched sixth floor above No.14.
- 6.28 The proposed design continues the tripartite articulation of the facade below, creating the notion of three "townhouse" bays, as previously welcomed by Officers. In neo classical architecture the roofing material, in this instance diamond shaped metal shingles, would be significantly taller than the dormer windows cut into it. As such the proposal is to create a series of tall gables that have a triangular glass slot between them.
- 6.29 The fourth floor will remain set back from the façade by 580mm so as to be subordinate to the original building and reduce its visibility from street level. The proposed dormers will be larger than existing to increase daylight within the office and improve the outlook. This will also improve the proportions of the new mansard making it visually more suitable.
- 6.30 The current proposal is a less bulky solution and should be considered favourably given the proposed office use and the location within the Conservation Area. The

proposed design maximises light into the fourth and fifth floor office areas in accordance with design policy requirements.

- 6.31 Significantly, to the rear of the property, the proposed roof extension is now set back from the rear facade by some 5.5m. This is an increase in setback, compared to the previous scheme, which was only set back some 2.4m. Taking account of the proximity of No.28 and 29 Percy Street in particular, this revised design should be welcomed as the bulk of the roof is moved away from this property. The impact on neighbouring amenity is discussed in detail below.
- 6.32 In respect of No.14, the replacement of the pediment and increase in height was accepted by Officers as the introduction of a “proper attic storey” and increased height was considered to better establish the building as a “bookend”. Furthermore this was perceived to reinforce the building as a landmark to terminate the views from Whitfield Street.
- 6.33 Again, the architect's have built upon the design principles previously accepted by Officers but altered the proposed design to better reflect the proposed office use and the requirements of the development. It is significant however, that the applicants wish to refurbish the building for office purposes and do not seek to extend to a sixth floor above No.14. This was previously proposed to maximise the amount of residential units incorporated into the building which is no longer a consideration. As such, the design seeks to provide the best possible amount and quality of office space to meet the known requirements of the local office market.
- 6.34 Above No.14 the proposal is to replace the existing plant room rooftop structure and its pediment with new office floor space. Fronting Windmill Street, we propose a “lantern” and behind, a lower section of roof which extends the width of the property.
- 6.35 The lantern acts as a marker that addresses both the Whitfield Street vista but also acknowledges the Tottenham Court Road approach. The tapered form and dormer arrangement of the lantern draws on the new roofs of No.11-13 and creates a “family” of roofscapes. The height of the lantern has been considered to create the vista stop and to mediate between the terrace buildings to the west and the met building to the east.
- 6.36 The lantern will be clad in diamond shaped metal shingles, a material proposed throughout the scheme and helping to visually tie the buildings together. The proposed design provides a sense of place and positively contributes to the character of the Conservation Area. As such, the proposed design is in accordance with policy.

- 6.37 The design solutions proposed retain the elements of the scheme which were previously welcomed by Officers and taking all the above into account, it is considered that the proposed design has evolved to better suit the proposed office use. As such the proposed design should be considered acceptable.

Effect on the character or appearance of the Charlotte Street Conservation Area

- 6.38 Charlotte House makes a negative contribution to the significance of the Charlotte Street Conservation Area. It is poorly resolved, with limited active frontages, and poorly detailed with poor quality materials. These application proposals seek to resolve these shortcomings, significantly improving the contribution that the building makes to the conservation area and, consequently, enhancing the character and appearance of the Charlotte Street Conservation Area.
- 6.39 Seen as a whole, the roof extension and ground floor changes are a significant benefit to the conservation area which will lead to its enhancement. The application proposals are well considered and based on a thorough understanding of the sites' context.
- 6.40 The application proposals will improve the architectural vocabulary and proportions of the building, improving the contribution that the building makes to the character and appearance of the conservation area, leading to its enhancement.

Roof extension

- 6.41 Charlotte House was constructed in the 1980's in a pastiche Georgian style and does not form part of the original or late significant phases of the development of Charlotte Street. Whilst its design draws on the local Georgian character, the building is not successfully resolved and lacks any architectural character. The proposed roof extension rectifies this and enhances the appearance of the building and the contribution that it makes to the character and appearance of the conservation area.
- 6.42 The changes to the roof profile are in two parts, firstly is the replacement of the existing plant room to no. 14 and, secondly, the extension of the roof to no. 11 to 13 to provide additional office accommodation. The Met Building to the east is 13 storeys which establishes increased heights along Tottenham Court Road. The roof extension relates positively to this, mediating between the Georgian townhouses and the Met Building.

- 6.43 The roof of no. 14 Windmill Street is currently occupied by lift overruns and flues which give an untidy profile to the roof. The extension to no. 14 Windmill Street will replace the existing plant room, enhancing its appearance in oblique views, providing a consistent and coherent roofscape. The proposed roof extension extends above the parapet level with a glass 'lantern' which will accentuate the building as a bookend to Charlotte House and also in views along Whitfield Street. This will be an improvement to these views along Whitfield Street which will be a significant enhancement to the appearance of the conservation area.
- 6.44 The roof extension also relates to the changes proposed at ground floor, with the proportions of the glazed entrance being carried through to the roof extension. The proposed roof extension provides a strong 'top' to the building which, combined with the changes to the ground floor of the building, will complete the composition of the building enhancing its architectural integrity.
- 6.45 The extension to no. 11 to 13 reinforces the subdivision of the facade, with glass slots splitting the roof into three parts. This will provide an appropriately designed top to the building which enhances the overall composition of the building. The fenestration pattern of the existing building will be carried on up to the roof extension, enhancing the architectural integrity of the building.
- 6.46 Windmill Street is a narrow street, with buildings at the back edge of the footpath. The roof extension will not be readily discernible from street level which will limit any effects on the conservation area.

Other changes to exterior

- 6.47 At ground floor, the existing building is divorced from the street by a lightwell and heavy faux stone cladding which creates a hostile environment. A new entrance to the building will create an inviting entrance which is proportionate to the importance of the building. The new ground floor entrance ties in with the roof top changes which will enhance the contribution that the building makes to the character and appearance of the conservation area.
- 6.48 The proposed changes will create active frontages to the street and will be a significant improvement on the existing situation. Bridges over the lightwells will connect the building with the street, and the central bay will be brought forward to enhance the streetscene. The revised entrance will enhance activity and the legibility of the existing building.
- 6.49 The proposals introduce a strong vertical cornice above ground floor to which define the base of the building and further improving the overall composition of the

building. This, combined with the improvements to the remainder of the building, will be a very significant improvement to the conservation area.

- 6.50 It is also proposed to carry out a soot wash of the exterior of the building. This will add a historic patina to the exterior of the building, tying it in with the surrounding buildings in Charlotte Street. This will be a significant improvement to both the character and appearance of the conservation area.
- 6.51 In summary, the application proposals seek to resolve the shortcomings of the existing building through its sensitive re-working. The roof extension reflects the bays of the existing building, and the other external changes will provide active frontages to street level and will be an enhancement to the Charlotte Street Conservation Area.
- 6.52 The proposals will enhance the significance of the identified heritage asset – the Charlotte Street Conservation Area. The proposals will meet the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF as well as the policies of the development plan.

Impact on Amenity

Overlooking

- 6.53 A key consideration in respect of the proposed scheme's impact upon amenity is the relationship between the proposed fifth floor windows and roof terrace with the properties at 28 and 29 Percy Street.
- 6.54 Policy DP26 requires that new development does not cause unreasonable overlooking to neighbouring properties to the detriment of their occupiers. Camden Planning Guidance 6 discusses the issue of overlooking and encourages development to have a separation distance of 18m between windows facing each other to ensure privacy is maintained. The distance between the fifth floor windows and Percy Street will be 25m and due to the set back and angles, there will be no direct overlooking from the office space.
- 6.55 No.28 Percy Street has two roof terraces which face north towards the application site, one at second and one at third floor level. We propose to set the fifth floor roof terrace back from the rear edge of the building (No.11-13) by 2.4m. The distance from the terrace to those at 28 Percy Street will therefore be 11.9m (second floor) and 19.1m (third floor).

- 6.56 To obscure any potential views (or perceived views) from the terrace, we propose obscure glazing to the balustrades (1300mm high). Furthermore an in board handrail (250mm) will be fitted at 1000mm high to prevent people from standing at the edge of the terrace. This arrangement ensures that when sitting on the terrace (which is more usual than standing) there is no direct overlooking. In addition, suitable tall planting will also add to the natural screening of the terrace. Taking account of the separation distances and sightlines, the relationship between the two buildings is acceptable and the terrace is in accordance with the requirements of policy.
- 6.57 Notably, the terrace will be ancillary to an office use which typically will be closed in the evening and at weekends. People using the terrace are likely to do so during lunch time hours and occasionally in the evenings. As such, residents at Percy Street will be able to use their own terraces for the large majority of the time without the proposed terrace being in use.
- 6.58 Whilst the proposed terrace and office is acceptable in its own right, the scheme is considered an improvement on the recently considered scheme. That scheme proposed a roof terrace at the fifth and sixth floors. Significantly though, the fifth floor terrace was set at the rear edge of the building (No.11-13) and was separated from the terraces at 28 Percy Street by just 9.5m and 16.7m (second and third floors). The previously proposed scheme was therefore 2.4m closer to the Percy Street properties and furthermore, the proposed terraces would have served residential units and could be have been used almost anytime.
- 6.59 The Officers concluded that this relationship would not create any direct overlooking and that the proposed roof terrace would be acceptable. Given this and the improvements made by the proposed scheme the current proposal should also be acceptable.

Daylight & Sunlight

- 6.60 Policy DP26 supports development that protects the quality of life for occupiers of neighbouring properties. One consideration is the potential impact upon levels of daylight and sunlight arising as a result of development. Planning Policy identifies the Building Research Establishment report "Site Layout Planning for Daylight & Sunlight 2011" as the document which should be considered in the assessment of daylight and sunlight impacts.
- 6.61 To assess this impact, a baseline assessment has been undertaken and the results are presented within the Daylight and Sunlight Study submitted with the

application. The methods used in the assessment were Vertical Sky Component (VSC), "No Sky" Line and Average Daylight Factor (ADF) for daylight and Annual Probable Sunlight Hours (ASPH) for sunlight.

- 6.62 The Study concludes that impacts upon properties on Windmill Street and to the rear at Percy Street will only be negligible. The development is of a height and design that enables sufficient daylight and sunlight to reach the neighbouring properties. As such, it is concluded that overall the scheme will have no material impact on neighbouring amenity in VSC daylight terms. Furthermore, the scheme proposals will have no material impact on neighbouring amenity in ASPH sunlight terms.
- 6.63 The proposed development will not have a harmful impact upon the amenity of neighbouring occupiers and as such it is considered to be in accordance with the relevant standards and comply with the objectives of Policy DP26.

Noise

- 6.64 The proposed development includes the replacement and relocation of external plant. Plant will be relocated from within the roof top plant room (above No.14) and elsewhere at roof level, to the second floor rear external area. It is proposed to screen the plant within the area highlighted, double stacking it for space efficiency.
- 6.65 In this location, the plant will be alongside the plant enclosure of the Met Building. This therefore focuses the plant in one location which has visual benefits as well as reducing the potential for noise impacts on multiple receptors.
- 6.66 Policy DP26 considers impact on amenity (as stated above) and as such a Noise Impact Assessment has been undertaken. This has assessed the level of background noise and in accordance with policy, designed the plant to meet the necessary standards (5dB below the lowest measured background noise level).
- 6.67 The plant will meet modern standards for noise emissions. The proposed location and enclosure of the plant will ensure that noise emissions are minimised and kept below acceptable levels. As such there will be no harmful impact upon neighbouring occupiers and the plant will therefore, be in accordance with Camden's policies.

Other Planning Matters

Sustainability

- 6.68 Policy generally requires development to reduce the amount of carbon emissions produced and to improve energy efficiency in a bid to reduce overall energy consumption.
- 6.69 The London Plan encourages the refurbishment of office buildings as a sustainable way of reducing take up of new land and the need for demolition and reconstruction. In refurbishing properties, the London Plan encourages the installation of modern technologies to reduce energy consumption and carbon emissions. Camden's policies reiterate and build upon the London Plan's objectives and within Planning Guidance 3 encourage developers to spend at least 10% of the development budget (for refurbishment and small extension schemes) on environmental improvements.
- 6.70 The proposed development accords with this aspiration and this is set out in detail within the Design & Access Statement. To summarise, the proposal includes the following environmental improvements:
- Replacement of all windows to achieve a U-value no higher than 1.8W/m²K;
 - Incorporation of insulation on the external facade to improve the existing U-value to no more than 0.3W/m²K;
 - Replacement of all building services systems and the installation of new plant, lighting, heating and cooling systems, ventilation, water etc. This will reduce the amount of non-renewable fuels required to meet the energy demand of the building.

Sustainable Transport

- 6.71 Policy encourages development to be in the most sustainable locations and to ensure facilities are available to encourage walking and cycling to work. The proposed development provides cycle storage and showers within the basement which is accessible to all workers at the building. The development therefore encourages cycling as an alternative means of transport.
- 6.72 The site is within Pta 6a and is therefore the most accessible location for public transport. Workers will have the option of the nearby tube stations (Goodge St,

Oxford Circus and Tottenham Court Road) together with the main bus routes serving the area and connecting to other stations in London. Given the high level of access from public transport, it is clear that people are able to arrive at the site without the need for private motor vehicle. The proposal therefore meets the requirements of Policy DP17.

7. Summary

- 7.1 The driving rationale for the development is to improve and maximise the level of office floorspace available in the building. This area of Central London has a vibrant office market, for the right kind of office building and there are strong levels of activity within the media and fashion sectors. There is demand for Grade A space and the proposed development through comprehensive refurbishment, upgrading and extension seeks to meet this demand. The proposed development seeks to create a high quality contemporary building with a historic twist.
- 7.2 The existing use of the building is B1 (a) offices, providing some 3,265 sq m (GEA) set over six floors, including the lower ground. The proposed development seeks to increase the amount of office floorspace offered by the building and to provide a significant upgrade in the quality of the office accommodation. Neither loss of office floorspace, nor change of use is proposed. The development seeks only to enhance and add to the existing office floorspace, in full accordance with Camden's policies.
- 7.3 National, regional and local level policies all support the provision of office space in the most sustainable and accessible locations. The site is within the Central London Area (also within the Central Activities Zone), a short distance from Tottenham Court Road Growth Area. Within such areas, there is strong policy support for office development, particularly where this is of a size and scale suitable to meet the demands of small and medium sized businesses.
- 7.4 Charlotte House makes no contribution to the significance of the Charlotte Street Conservation Area. It is poorly resolved, with limited active frontages, is poorly detailed with poor quality materials. These application proposals seek to resolve these shortcomings, improving the contribution that the building makes to the conservation area.
- 7.5 Seen as a whole, the roof extension and ground floor changes are a significant benefit to the conservation area which will lead to its enhancement. The application proposals are well considered and based on a thorough understanding of the sites' context.
- 7.6 In terms of impacts on noise, daylight and sunlight, the supporting documentation demonstrates that there will be no harmful impact upon the neighbouring properties.
- 7.7 In terms of the proposed roof terrace to the rear, we have designed a scheme which is a significant improvement on the scheme that recently received Officer

support. We have set the rear facade of the fifth floor extension back from the main rear facade of No.11-13 Windmill Street by 5.5m. There will therefore be no direct window to window overlooking.

- 7.8 Whilst the proposed terrace and office is acceptable in its own right, the scheme is considered an improvement on the recently considered scheme. That scheme proposed a roof terrace at the fifth and sixth floors. Significantly though, the fifth floor terrace was set at the rear edge of the building (No.11-13) and was separated from the terraces at 28 Percy Street by just 9.5m and 16.7m (second and third floors). The previously proposed scheme was therefore 2.4m closer to the Percy Street properties and furthermore, the proposed terraces would have served residential units and could be used almost anytime.
- 7.9 In our view, the proposed development is both acceptable in principle and of a good design which has a positive impact upon the consideration area. The scheme includes numerous measures to improve the building's energy efficiency and importantly, provides new office accommodation in a sustainable location, highly accessible to all. The proposals are considered to amount to "sustainable economic development", in full accordance with policy at all levels and planning permission should therefore be granted.

