

PLANNING STATEMENT

Whittington House
19-30 Alfred Place
London
WC1E 7EA

Report date: June 2014

Planning Statement

Whittington House, 19-30 Alfred Place, London, WC1E 7EA

Report date: June 2014

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Planning Statement

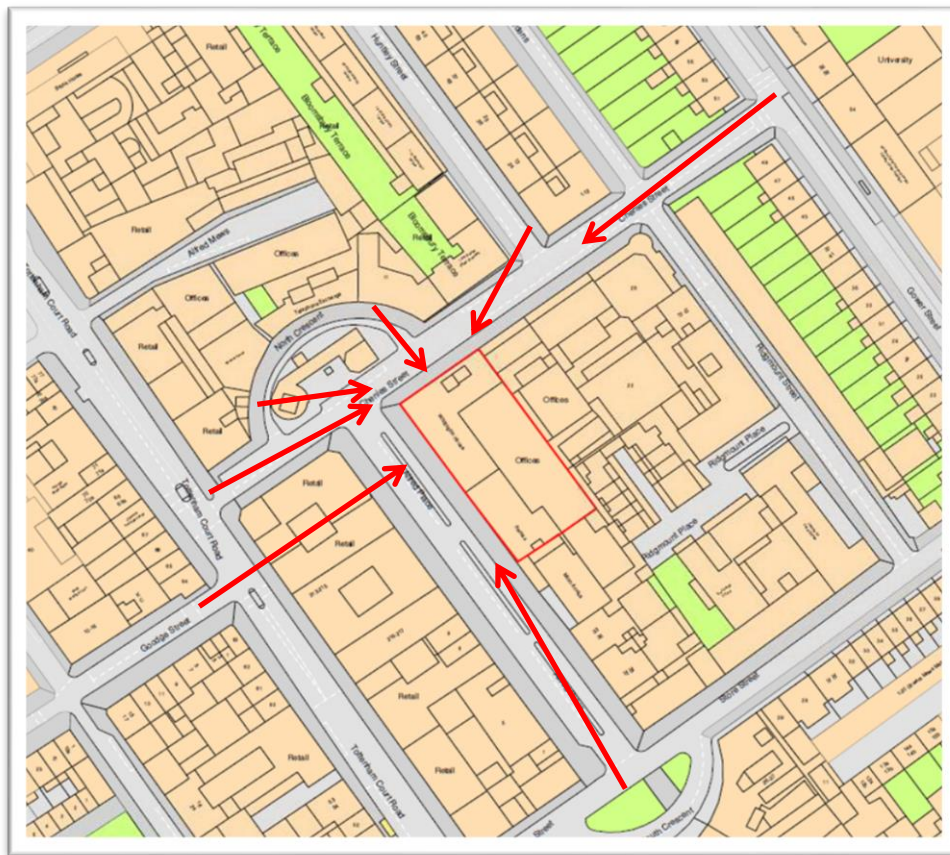
1. INTRODUCTION

- 1.1. Vail Williams LLP has been instructed by Platine Holdings Limited to submit the attached planning application for conversion of existing 7th floor to B1(a) Office (currently enclosed plant material, ancillary B1(a)), a modest infill extension to the 7th floor and the erection of an 8th floor, all for B1(a) office use at Whittington House, 19-30 Alfred Place.
- 1.2. It is important to note that the existing 7th floor currently comprises ancillary office (B1(a)) space, housing plant machinery for the functioning of the offices. As such, the conversion of this existing floor area to office space does not require planning permission as no change of use is involved.
- 1.3. The proposals are associated with extensive internal upgrading of the building to provide office facilities which meet tenants' requirements and aspirations.
- 1.4. This statement presents the policy background to the proposal as set out within the National Planning Policy Framework ('NPPF') adopted March 2012, the London Plan (2011), Revised Early Minor Alterations to the London Plan (October 2013), the Camden Core Strategy (2010), associated Proposals Map (2010) and the Camden Development Policies Document (2010). The assessment describes how the proposed change of use complies with this guidance.
- 1.5. The remainder of this Planning Statement is arranged under the following headings:
 - 2 SITE AND SURROUNDINGS
 - 3 PLANNING HISTORY
 - 4 PROPOSAL
 - 5 PLANNING POLICY CONTEXT
 - 6 PLANNING CONSIDERATIONS
 - 7 CONCLUSION
- 1.6. This statement should be read in conjunction with the associated drawings and all other documentation that forms part of this planning application. The design team involved in the preparation of this application are as follows:

- Client – Platine Holdings Ltd
- Planning Consultant –Vail Williams LLP
- Architect –Tatehindle
- Heritage Consultant –The Built Heritage Consultancy Ltd
- Transport Consultant – Russell Giles Partnership (RGB)
- Daylight / Sunlight – Malcolm Hollis LLP
- Sustainability Consultant –Richard Hodgkinson Consultancy
- Noise Consultant –EQUUS Partnership
- View Management and Verified Views –AVR London

2. SITE AND SURROUNDINGS

- 2.1. Whittington House is situated in Fitzrovia in close proximity to Goodge Street Station and to the South East of Regents Park. The immediate area comprises a mix of commercial uses, including retail, office and restaurants/cafes. In addition, there is a dramatic arts academy to the rear of the property (Royal Academy of Dramatic Arts – “RADA”).
- 2.2. The property is located to the South West of the London Borough of Camden and is located behind the primary retail street, Tottenham Court Road, and also within the Bloomsbury Conservation Area.
- 2.3. Given the property’s location, there are a number of key views for consideration within this application, as identified below:



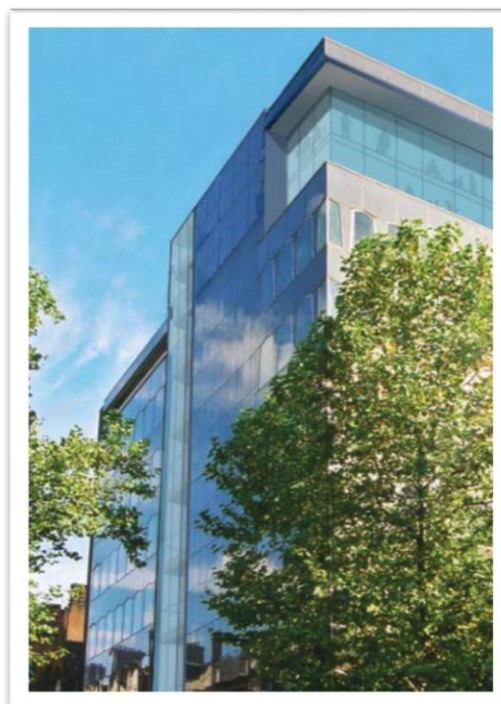
- 2.4. The building itself is an “L” shape and comprises 9 storeys; a basement for parking; ground floor comprising a reception area and office showroom use; 1st floor to 6th floor comprising office accommodation; and a part 7th floor housing plant equipment for the operation of the building (this is considered ancillary office given the predominant use of the building). To the rear of the building is a small courtyard at 1st floor level which houses some plant material and also lightwells to the ground floor office area below.
- 2.5. The building was designed by Richard Seifert and Partners and is typical of their early 1970s designs. This was identified by differentiating the top storey by virtue of a horizontal recess, topped by a relatively thin projecting cantilever, and the clearly identifiable lift core expressed in the façade along Chenies Street, which further emphasis this tallest part of the building.

3. PLANNING HISTORY

- 3.1. There have been a number of planning applications submitted for various proposals at Whittington House, comprising large scale extensions, changes of use and smaller scale proposals integral to the functioning of the offices.
- 3.2. The larger scale proposals which are more relevant to this proposal include an application which was submitted in 2002 for the extension of all seven floors to the existing roof terrace (ref: PSX0005447/R1). The proposal was to infill the rear recess to create additional office space. We understand that the application received a positive recommendation from your committee, although the application was subsequently withdrawn as a Legal Agreement was never signed.
- 3.3. A further application, amending this above scheme was submitted (ref: PSX0204843) and again, whilst we understand that this had a positive recommendation from your Council, the scheme was not formally approved as a Legal Agreement was never signed. It was subsequently withdrawn.
- 3.4. This application proposed significant alterations to Whittington House, albeit to the rear of the property, and proposed an increase in height of plant enclosure on the roof, which was deemed acceptable.

Pre-Application Submissions:

- 3.5. A request for pre-application advice was submitted to the London Borough of Camden Council on 21st February 2014 and a meeting held with your Planning Officer and Conservation Officer on 26th March 2014. This submission proposed the conversion and extension to the existing 7th floor for office use and the erection of an 8th floor with plant material on top.
- 3.6. The design proposed the increase in height of the current 7th floor horizontal recess to double height, to maximise available floor space on both the 7th and 8th floors, and for the glazing of the stair core on the Chenies Street Elevation (as identified in the imagery below, prepared by Tatehindle).



- 3.7. A number of points were raised in this meeting and a copy of the minutes of this meeting is attached at **Appendix 1**, which were also sent to your Council on 4th April 2014. In summary, whilst it was agreed that the principle of an 8th floor could be acceptable in planning terms, this would be dependent on design and conservation principles.
- 3.8. The main aspects for consideration in a potential full application were highlighted as follows:
- The impact on the Listed Building at 16 Chenies Street;
 - The impact on long distance views from Tottenham Court Road and Goodge Street;
 - Views from the North and in particular along Chenies Street, North Crescent and Gower Street;
 - The impact of an increase in height on the character of the Bloomsbury Conservation Area.
- 3.9. Following this meeting an Heritage Consultant was instructed to assist in the re-design of the proposals, given the sensitive setting of this building.
- 3.10. In response to this meeting and the concerns raised, an amended scheme was submitted for your Council's comment on 4th April 2014. This scheme sought to retain the Seifert and Partners styling, through the retention of 7th floor recess, albeit this recess would increase in height by 450mm. The submissions also proposed the erection of an 8th floor, recessed from the current Alfred Place elevation. This was designed to limit the impact of the 8th floor street view and also to limit the impact on key views from the surrounding area in accordance with the pre-application comments.



- 3.11. A written response was received on 15th April 2014 from your Council, which addressed both proposals. Whilst the initial scheme was largely precluded on design terms, the amended scheme benefitted from very few comments.
- 3.12. The main concerns following the revision of the scheme can be identified as follows:

- The impact of the glazed stair core and north elevation on the character of the area;
- The impact of the proposals on key east/west views from Gower Street and Tottenham Court Road;
- The impact of the proposals on Chenies Street (elevations were not available at this time).

3.13. In addition to the above, and in the re-assessment of the proposals following the written response, the scheme has been amended and initial consultations have been held with the Bloomsbury Conservation Area Committee (BCAAC). A meeting was held on 29th April 2014 where initial feedback was provided verbally. At this meeting it was requested that the height of the 7th floor recess be retained as existing, which has been incorporated into the final scheme, the subject of this application. It was also requested that a “mock-structure” of the proposals be erected for a temporary period so that the proposed height increase could be considered further. We are currently working with engineers to erect this structure and hope for this to be completed during the course of the application.

3.14. In both the pre-application responses and the discussions with the BCAAC, it was stated that the conversion and extension of the 7th floor would be acceptable in principle and that the erection of an 8th floor has not been ruled out, but further design considerations and justification would be required.

Other Planning Applications:

3.15. It is important to note that planning permission has recently been approved at committee, subject to the completion of a legal agreement, for the adjacent site at 31-34 Alfred Place (application ref: 2013/1978/P).

3.16. This application permits the *erection of a seven storey building with basement and terrace, for office use (Class B1) at basement to 5th floor level, and residential use (Class C3) at 6th floor level providing 4 self contained flats (2 x two bedroom and 2 x 3 bedroom), and ancillary servicing and access arrangements (following demolition of existing buildings).*

3.17. This connection between the existing buildings and Whittington House clearly identifies the established relationship of Whittington House as the dominant building along Alfred Place, with the building line rising along Alfred Place to the point of the lift core on the north-western elevation of Whittington House.

3.18. The approved development at 31-34 Alfred Place alters this established relationship by bringing forward the building line of 31-34 Alfred Place, in line with the front elevation of Whittington House. In accordance with this, whilst the upper levels (floors 5 and 6) have been set back, they are still further forward than the existing buildings as is the remainder of the building, and the overall development is much greater in scale and bulk. This further alters the relationship of Whittington House, greatly decreasing its dominance along Alfred Place, which is so widely recognised.

4. PROPOSAL

- 4.1. The enclosed application seeks a conversion of the 7th floor from enclosed ancillary plant rooms, to office use (B1(a)) and a 7th and 8th floor extension for office use (B1(a)). The submission proposes the relocation of a majority of plant material to the existing basement, with a small area being retained (albeit relocated) on the 7th and 8th floors to house air handling units.
- 4.2. As mentioned in Section 1 of this report, the existing 7th floor currently comprises ancillary office (B1(a)) space, housing plant machinery for the functioning of the offices. Therefore, the conversion of this existing floor area to office space does not require planning permission as no change of use is involved.
- 4.3. The proposed 7th floor extension will result in an increase of 67sq.m (GEA) and the proposed 8th floor will result in an additional 711sq.m (GEA). The total uplift in floor area is therefore 778sq.m (GEA), or 669sq.m (GIA).
- 4.4. This, combined with the conversion of the existing 7th floor, will result in an additional 1,162sq.m of office floor space (NIA).
- 4.5. The relocation of plant material to the basement will result in a loss of 8 parking spaces from the existing 34, leaving 26 spaces for the building. In addition, there are currently 85 cycles spaces with a further 3 proposed as a result of the increase in floor area.
- 4.6. As a result of the pre-application meeting and response, and from discussions with BCAAC, the proposed scheme has been amended significantly since the first pre-application submission on 21st February 2014.
- 4.7. As detailed in Section 3 above, the main areas for attention following the final pre-application response and initial discussions with the BCAAC were as follows:
 - The impact of the glazed stair core and north elevation on the character of the area;
 - The impact of the proposals on key east/west views from Gower Street and Tottenham Court Road;
 - The impact of the proposals on Chenies Street (elevations were not available at this time).
- 4.8. In accordance with the above, the proposed glazed aspect of the stair core has been removed and it is now proposed that this will be completed in materials to match the existing, adjacent lift core.
- 4.9. In terms of the impact on the proposals on views from Gower Street and Tottenham Court Road, a Verified View Scoping Study has been completed by AVR London and is included in this submission.
- 4.10. In addition, the Verified View Scoping Study also provides imagery of the proposal when viewed from Chenies Street.
- 4.11. Detailed information on the design of the scheme (including area schedules) can be found in the accompanying Design and Access Statement, prepared by Tatehindle.

5. PLANNING POLICY CONTEXT

- 5.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2. The Development Plans in relation to this site comprise the National Planning Policy Framework ('NPPF') adopted March 2012 (which replaces previous National Planning guidance, such as Planning Policy Statements (PPS) and Planning Policy Guidance (PPG)), the London Plan (2011), Revised Early Minor Alterations to the London Plan (October 2013), the Camden Core Strategy (2010), associated Proposals Map (2010) and the Camden Development Policies Document (2010).

National Planning Policy:

- 5.3. The National Planning Policy Framework (NPPF) was adopted in March 2012 and largely replaces previous Planning Policy Statements and Planning Policy Guidance Documents. It contains an overarching theme on the presumption in favour of sustainable development and states that Local Planning Authorities should approve development proposals that accord with the development plan without delay.
- 5.4. Paragraph 17 of the NPPF set out a series of 12 core planning principles, which should be taken into account in both plan-making and decision-taking. There are 6 core principles which are particularly pertinent in this case, as follows (*inter alia*):
- Delivering sustainable economic development and responding to opportunities for growth (3rd core planning principle);
 - Always seek to secure high quality design for future occupants of buildings (4th core principle);
 - Promoting the vitality of our main urban areas (5th core planning principle);
 - Encouraging the effective use of land by reusing land that has been previously developed (8th core planning principle);
 - Conserve heritage assets in a manner appropriate to their significance (10th core principle);
 - Focusing development in a sustainable location which can make the fullest use of public transport, walking and cycling (11th core planning principle).
- 5.5. Section 1 of the NPPF aims to *build a strong and competitive economy*. In accordance with this, paragraphs 18 and 19 state that the Government is committed to securing economic growth in order to create jobs and prosperity and ensuring that the planning system does everything it can to support sustainable economic growth. It also states that significant weight should be placed on the need to support economic growth through the planning system.
- 5.6. In addition, paragraph 20 recognises the requirement for LPAs to meet the development needs of business in terms of planning.
- 5.7. Section 12 of the NPPF is also particularly important with regard to the proposed development. This section relates to conserving and enhancing the historic environment and paragraph 128 identifies that the significance of any heritage asset affected by a proposal should be considered at a level of detail proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Regional Planning Policy:

- 5.8. The London Plan (2011), including Revised early Minor alterations to the London Plan (2013) presents the spatial strategy for London, published by the Mayor of London. There are several policies which are particularly pertinent to this proposal:
- 5.8.1. **Policy 2.13** identifies Tottenham Court Road as an Opportunity Area where intensification of site is encouraged;
 - 5.8.2. **Policy 4.1** promotes the “*continued development of a strong, sustainable and increasingly diverse economy across all parts of London*”;
 - 5.8.3. **Policy 4.2** encourages “*renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility*”;
 - 5.8.4. **Policy 7.7** relates to tall buildings and states that these should be restricted to the Central Activities Zone and more specifically, Opportunity Areas and Intensification Areas, which have good access to public transport.
- 5.9. The above Policies from the London Plan are largely positive and support sustainable development, to support the wider economic objectives of the plan.

Local Planning Policy:

- 5.10. In accordance with the NPPF, each Council is required to have an up to date Local Plan. In 2010 (prior to the NPPF) the London Borough of Camden adopted its Core Strategy, Development Policies Document and associated Proposals Map, in accordance with the Local Development Framework requirements.
- 5.11. An extract of the Proposals Map can be seen below, which identifies Whittington House within the Central London Area, the Bloomsbury Conservation Area, a traffic safeguarding area and on the outskirts of the Parliament Hill Oak Tree to Palace of Westminster viewing corridor. In addition, the site lies within the Fitzrovia Area Action Plan boundaries.



- 5.12. In addition to these documents, the London Borough of Camden also has also adopted a series of 8 Camden Planning Guidance Documents (2013), the Fitzrovia area Action Plan (2014) and the Bloomsbury Conservation Area Appraisal and Management Strategy (2011).

5.13. These documents are all pertinent to the proposed development at Whittington House and will be considered below.

▪ ***London Borough of Camden Core Strategy (2010) and Development Policies Document (2010):***

5.14. Within the Core Strategy and Development Policies document, Tottenham Court Road is referred to as a “*Growth Area*” and as a “*Highly Accessible Area*”. Whilst Alfred Place is not included in the allocated Tottenham Court Growth area, in its highly sustainable location and in accordance with **Policies CS1 and CS3** of the Core Strategy, the Council will promote efficient use of land and high density developments, whilst preserving the character of the area and having regard to heritage implications.

5.15. In addition, **Policy CS5** seeks to manage the impact of growth and development by ensuring the appropriate structures are available to support those that work and visit the borough, whilst balancing the impact on the character of the area. **Policy CS8** promotes a successful and inclusive Camden economy.

5.16. The Core Strategy recognises that there is a need to promote high quality places whilst conserving heritage and **Policy CS14** provides a number of criteria for ensuring that places and buildings are attractive, safe and easy to use.

5.17. Within the Camden Development Policies Document, it is important to note **Policy DP1**, which states that where more than 200sq.m of additional floorspace is proposed, up to 50% of all additional floorspace should be allocated to a secondary use, preferably housing.

5.18. Having said this, there are a number of criteria which the Council will review when considering a development with this policy, which are as follows (*inter alia*):

- a) the character of the development, the site and the area;
- b) site size, the extent of the additional floorspace, and constraints on including a mix of uses;
- c) the need for an active street frontage and natural surveillance;
- d) the economics and financial viability of the development including any particular costs associated with it;
- e) whether the sole or primary use proposed is housing;
- f) whether secondary uses would be incompatible with the character of the primary use;
- g) whether an extension to the gross floorspace is needed for an existing user;
- h) whether the development is publicly funded;
- i) any other planning objectives considered to be a priority for the site”

5.19. Given that the proposals included in this application exceed 200sq.m, **Policy DP1** will come into effect.

5.20. With regard to tall buildings specifically, paragraph 24.10 states that due to the diverse nature of Camden’s Character, proposals for such developments will be considered on a case by case basis, and in accordance with **Policies DP24 and DP25** of the Development Policies document. **Policy DP24** seeks to secure high quality design through consideration of a number of criteria, as follows:

- a) *the character, setting, context and the form and scale of neighbouring buildings;*
- b) *the character and proportions of the existing building, where alterations and extensions are proposed;*

- c) *the quality of materials to be used;*
- d) *the provision of visually interesting frontages at street level;*
- e) *the appropriate location for building services equipment;*
- f) *existing natural features, such as topography and trees;*
- g) *the provision of appropriate hard and soft landscaping including boundary treatments;*
- h) *the provision of appropriate amenity space; and accessibility.*

5.21. **Policy DP25** relates to conserving heritage and with specific regard to Conservation Areas, requires applications to take account of conservation area statements, appraisals and management plans and to ensure that proposed development preserves and enhances the character of the area.

- ***London Borough of Camden Planning Guidance Documents (2013):***

5.22. Camden Council has prepared 8 Camden Planning Guidance Documents, the following of which are relevant in this case:

- **CPG 1 Design** – to be considered later in this Planning Statement;
- **CPG 3 Sustainability** – to be considered in the Sustainability Statement, prepared by Richard Hodgkinson Consultancy;
- **CPG 6 Amenity** – to be considered in the Daylight Sunlight Report, prepared by Malcolm Hollis LLP and within the Noise Report, prepared by Equus partnership;
- **CPG 7 Transport** – to be considered in the Transport Statement, prepared by Russell Giles Partnership;
- **CPG 8 Planning Obligations** – to be considered later in this Planning Statement.

- ***Fitzrovia Area Action Plan (2014):***

5.23. The London Borough of Camden has recently adopted the Fitzrovia Area Action Plan (March 2014), with the primary purpose of shaping the future of Fitzrovia and the western part of Bloomsbury.

5.24. A character area assessment of Alfred Place has been included and recognises that there are a mix of architectural styles along the street, with a row of mature trees along Alfred Place and South Crescent, which make a positive contribution to the area.

5.25. Whittington House is not mentioned in the Fitzrovia Area action Plan, however Alfred Place itself is recognised as a potential area for enhanced open space by virtue of the wide road layout.

- ***Bloomsbury Conservation Area Appraisal and Management Strategy (2011):***

5.26. Alfred Place is located in Sub Area 4: Grafton Way/Alfred Place/Tottenham Court Road of the Bloomsbury Conservation Area Appraisal and Management Strategy Document (BCAAMS).

5.27. This document will be considered in more detail within the Heritage Statement prepared by, the Built Heritage Consultancy Ltd, however in summary, the appraisal recognises that this sub-area is commercial in character. With specific regard to Whittington House and its relationship with the existing neighbouring 31-34 Alfred Place, the BCAAMS states the following:

“The eastern side of Alfred Place is more varied with buildings stepping down in height from north to south. At the northern end, the eastern side is dominated by Whittington House, Nos 19-30 (consec), a striking office building from 1972 by Richard Seifert and Partners, which makes a positive contribution to the Conservation Area. It comprises seven storeys, with a glazed ground- floor frontage sub-divided by angled, sculptural columns above which rises a smooth and highly reflective façade of glass and black marble cladding. The impact of this hard-edged building is softened by the line of semi-mature trees along the frontage. To the south is Nos 31-32, a 1960s block of a similar scale with the main seven-storey element set back from the street and a projecting five storey entrance block aligning with the predominant building line” (page 37).

- 5.28. The remainder of this report will consider the policy documentation identified above, in relation to the proposed scheme at Whittington House.

6. PLANNING CONSIDERATIONS

6.1. In light of the above planning policy review, there are a number of areas which require consideration with regard to the proposed works at Whittington House. These are as follows:

- Land Use / Need
- Design / Conservation / Townscape
- Long Distance Views
- Daylight / Sunlight
- Noise
- Transport
- Energy
- Sustainability
- Planning Infrastructure Contributions

6.2. These aspects have all been taken into consideration when designing the proposed development at Whittington House and are commented on in turn in the remainder of this section.

Land Use / Need

6.3. Whittington House has established office use since its first construction in 1972. The site is located within the Central Activities Zone, the Central London Area and is recognised in National, Regional and Local Planning Policy as being an area for further employment intensification. Given the site's highly sustainable and accessible location, the proposal for further office provision on site is in accordance with **Policies CS3** and **CS8** of the Camden Core Strategy (2010) and **DP13** of the Development Policies Document (2010).

6.4. **Policy CS6** of Core Strategy recognises that housing is a priority land use, however **Policy CS8** also places great importance on the Central London Area for the growth of business. As such, the document acknowledges that there are other objectives within the Local Development Framework which warrant a change in emphasis on the provision of housing.

6.5. As mentioned in Section 4 of this statement, the additional office provision is required to fulfil the aspirations and requirements of an existing tenant at Whittington House. The building is multi-let and is currently at full capacity with 4 companies occupying floor space within the building.

6.6. In addition to the proposed 7th floor conversion and 8th floor extension, the 6th floor is undergoing much renovation to accommodate the tenant's requirements. The same tenant will occupy the 6th, 7th and 8th floor and will therefore be an anchor tenant for the property.

6.7. It is noted in Section 5 and in the pre-application response, that **Policy DP1** of the Development Policies Document requires 50% of additional floor space to be allocated to a secondary use i.e. residential use, where the increase in floor area is greater than 200sq.m. Given the proposed increase in floor area of 669sq.m (GIA), 334.5sq.m of this should be allocated to residential.

6.8. Having said this, the Council acknowledges that is not always possible and the policy also recognises that consideration must be given to whether a mix of uses can practically be achieved on the site, what the most appropriate mix of uses is, and the appropriate scale and nature of any contribution to the supply of housing and other secondary uses. There

are 9 criteria which the Council will consider and of particular relevance to the proposed scheme, are:

- a) *the character of the development, the site and the area;*
- g) *whether secondary uses would be incompatible with the character of the primary use;*
- f) *whether an extension to the gross floorspace is needed for an existing user.*

6.9. In terms of the *character of the development, the site and the area*, Whittington House has established office use. As can be seen in the accompanying Design and Access Statement, the surrounding buildings are predominantly retail, office and café/restaurants at ground floor level, and the land uses along the remainder of Alfred Place is largely office.

6.10. In terms of the development itself, the established office layout of Whittington House makes the provision of residential difficult. In terms of practicality of the provision of residential space, detailed discussion have taken place with the architects, Tatehindle and they comment as follows:

6.10.1. The building form

The existing building was designed to specifically accommodate office space, which comprises a clearly arranged linear floor plan, served by one main lift core to the north and a secondary stair core to the south. The north core separates the main linear office space fronting Alfred Place and the ancillary office space fronting Chenies Street.

6.10.2. Cores and entrances

The introduction of a residential scheme would necessitate separate cores to serve the units, along with a separate entrance and escape stair. The insertion of these elements would have a major impact on the existing office floor plate due to their size and the existing linear plan form of the office. The residential core would impede on the current office layout and core area circulation dramatically, limiting the open plan office layout and the viability of the office space on each floor. The service requirements for the office and the residential apartments will differ, which will require more space for the independent service ducts and plant space. The additional plant space will be located on the roof, which could also have a negative visual impact.

6.10.3. Entrances

The insertion of a dedicated residential reception space and facilities situated near the main core would encroach into the existing office lobby entrance, which in turn will reduce the presence of the office entrance reception area on Alfred Place. The intervention of a separate residential entrance would also have a detrimental impact on the ground floor façade. The feature windows on the ground floor will be required to be replaced with security doors, along with an additional ramp access on Alfred Place.

6.10.4. Residential units

Due to the linear nature of the plan and the location of the cores, a residential floor plan would require a connecting corridor from the north lift/stair core to the south stair core for means of escape. This central corridor would split the plan in two. The connecting corridor situated on the linear floor plan would significantly limit the residential layouts and will only provide an opportunity for a very small number of unsatisfactory single aspect units. To achieve a viable

number of residential units on the 8th floor the floor plate would have to increase towards the Alfred Place frontage, which will have a noticeably more intrusive visual impact from the street and on the existing landmark building.

6.10.5. **Basement**

The provision of a new core from the residential units to the basement car park, cycle storage and refuse area will have a major effect on the existing service and plan arrangement. This will require a total reorganisation of the basement plan arrangement to accommodate the residential and office facilities, security and services. The re-planning of the basement to accommodate the office and residential requirements is unviable, especially for the limited number of residential units on the top floors.

- 6.11. In light of the above, residential use is therefore not viable in design and function terms and in addition, satisfies criteria g) of **Policy DP1**: *secondary uses would be incompatible with the character of the primary use*, by virtue of the additional security measures which would be required.
- 6.12. Finally, the proposed increase in office floor area, by virtue of the 7th floor conversion and infill and the proposed 8th floor, is required to meet the demands of the existing 6th floor tenants, who wish to expand and therefore *criteria f) whether an extension to the gross floorspace is needed for an existing user*, is also applicable.
- 6.13. As such, it is considered that given the above explanation in relation to 3 of the 9 criteria, robust justification can be provided for the non-provision of residential use on site.
- 6.14. In accordance with **Policy DP1**, off-site provision of residential accommodation may also be considered. There are no other sites available to the client to support off-site residential provision; since they are not in ownership of other buildings within the borough.
- 6.15. As such, the applicant is willing to make a financial payment in lieu, which is the 3rd option within **Policy DP1**.
- 6.16. In terms of affordable housing contributions, paragraph 3.8 of the Development Policies documents states that where 1000sq.m of additional residential floor space is proposed, a contribution towards affordable housing is required. As per the above, no residential provision is proposed in this instance, however as under 1000sq.m is required though **Policy DP1**, a contribution toward affordable housing is not applicable in this instance in any case.

Design / Conservation / Townscape

- 6.17. The enclosed Heritage Statement and Townscape Impact Assessment, prepared by Built Heritage, provides an in depth commentary of the existing building and its history, the existing streetscape and surrounding Conservation Area, including key views. The document later assesses the impact of the proposed development on these areas. This document should be read in conjunction with the following paragraphs on Design, Conservation and Townscape.

6.18. **Design:**

- 6.18.1. **Policy DP24** of the Development Policies document states that all developments are required to be of the highest standard of design and provides a number of criteria for developments to adhere to/consider, including (but not limited to)

character, setting, context and materials. **CPG1: Design**, provides further guidance.

- 6.18.2. As discussed in Section 3 of this report, the proposed scheme has been subject to pre-application advice and initial consultations with the Bloomsbury Conservation Area Advisory Committee. The modest extension and conversion of the 7th floor is considered acceptable, as per the pre-application response.
- 6.18.3. Within the 7th floor recess, glazing will also be recessed to ensure maximum light to the proposed office area at 7th floor, without impacting on the characteristic Seifert recess.
- 6.18.4. In terms of the 8th floor extension, this has been subject to much design consideration in terms of scale, bulk, materials etc. to ensure a proposed 8th floor which is secondary to the remainder of the Seifert building and as such, will not result in a negative impact on the building itself, the streetscape or the surrounding Conservation Area.
- 6.18.5. The proposed 8th floor has been significantly reduced in scale and bulk since the pre-application submission and has now been set back from the main elevation fronting Alfred Place by circa 1.2m. This will result in a clearly subservient addition, which will have minimum impact to the streetscape along Alfred Place, whilst also preserving the character of the Seifert design, being visible from only certain parts of surrounding area.
- 6.18.6. The rear of Whittington House is less standardised in materials and design. Whilst the fenestration design is continued to the rear, the materials differ comprising exposed pre-cast concrete slabs, whilst the recessed 7th floor feature is not continued to the rear. There is little visual coherence on the upper parts of the elevation, which currently comprise functional additions for the servicing of the building (ad hoc provision of louvres and stock brick infill). As such, it is considered that the proposed 7th and 8th floor glazing on this rear elevation, will offer consistency to this elevation, further enhancing the design concept on the remainder of the building and being a welcome improvement to the existing.
- 6.18.7. At the northern end of the building is a prominent lift tower, which (as detailed in the Heritage Assessment) is a clear characteristic of the building, representing the highest point along Alfred Place and echoing the traditional tower of the adjacent Victorian Drill Hall. Within the proposals, the raising of this lift tower in accordance with the remainder of the building, will maintain the importance of it and its relationship with the Alfred Place façade and the Victorian Drill Hall.
- 6.18.8. The materials proposed for the 7th and 8th floors comprise glazing in a discrete framed system, which further ensures minimal impact on the Seifert design and the surrounding area. At either wing, anodised metal cladding is proposed to compliment the remainder of the existing building.

6.19. **Conservation:**

- 6.19.1. As identified in Section 5, Whittington House and Alfred Place are both mentioned in the Bloomsbury Conservation Area Appraisal and Management Strategy – Sub Area 4, with particular mention of the prominent position

Whittington House holds and acknowledgement of the remainder of Alfred Place stepping down from Whittington House.

- 6.19.2. The enclosed Heritage Statement and Townscape Impact Assessment provides an in depth analysis of the Bloomsbury Conservation Area and the importance that Whittington House plays. It also assess the surrounding Listed Buildings in great detail and concludes that:

“ the scheme’s impacts on upon relevant heritage assets, townscape and views would be very minor at most. Any negative impacts would be offset by the positive aspects of the design together with benefits of increasing the amount of office space and contributing to the economic vitality of Bloomsbury”.

- 6.19.3. The report states the following key messages:

“ the proposals would also re-establish the progressive increase in building heights from the south to the north of Alfred Place, which is such a characteristic of views along the east side of the street”.

“ It is therefore considered that these proposals will not have a detrimental impact on the character of the area, but will maintain the building’s role as a positive contributor to that character”

“ The design focus has been to make sure that the scale, character and the consistency of the roofline has been kept intact by the new design which will preserve and even enhance the character of the architecture. The design is carefully massed and modelled not to be overly prominent from the street in accordance with the guidelines”.

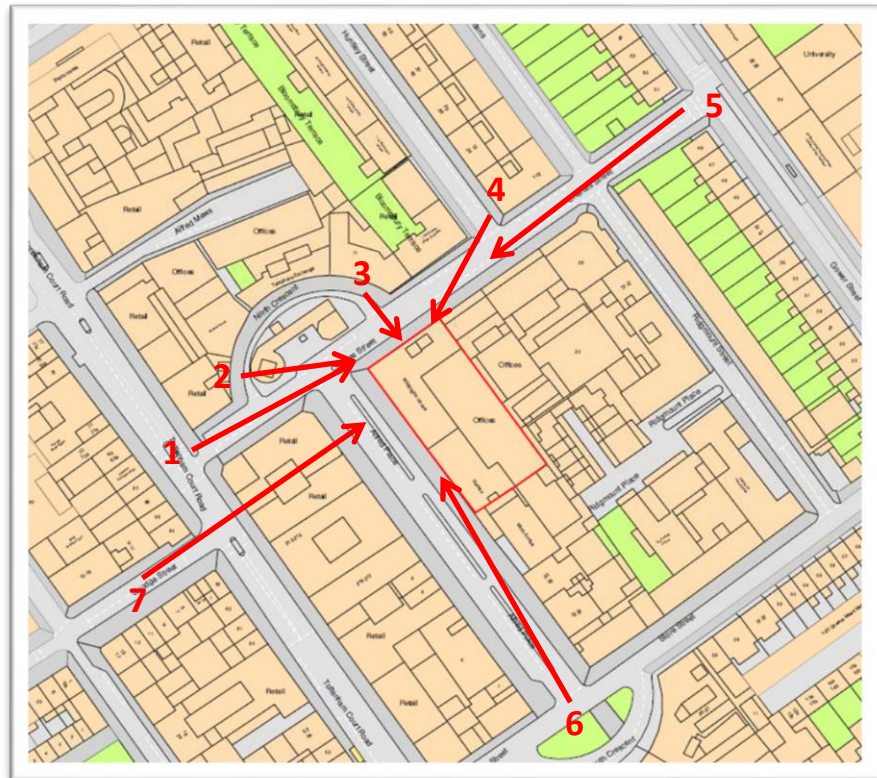
- 6.19.4. In light of the above, it is not considered that the proposals at Whittington House will have an adverse impact on the Conservation Area, and instead will re-establish the importance of Whittington House along Alfred Place.
- 6.19.5. In terms of the nearby Listed Buildings; drill Hall, Minerva House and Rangers War Memorial, these again have been considered individually in great detail within the Heritage Statement and Townscape Impact Assessment. The report concludes that the proposals will have a negligible impact on the setting and character of these Grade II Listed Buildings.
- 6.19.6. As such, the proposals accords with legislation within the Planning (Listed Buildings and Conservation Areas) Act 1990, to *preserve and enhance* the character or appearance of the Conservation Area.

6.20. Townscape:

- 6.20.1. As identified in Section 2 of this report, there are 6 key views in the local area which require consideration, as indicated on the map overleaf.

Key Views

1. Tottenham Court Road along Chenies Street;
2. West end of North Crescent;
3. East end of North Crescent;
4. Corner of Huntley Street and Chenies Street;
5. Gower Street along Chenies Street;
6. South Crescent along Alfred Place;
7. Goodge Street over intervening buildings.



6.20.2. These views are considered in detail in the Heritage Statement and Townscape Impact Assessment. In addition, the enclosed Verified View Scoping Study prepared by AVR London provides visualisations of the development before and after from various key vantage points which were highlighted in the pre-application meeting and written response, as well as during the meeting with BCAAC.

6.20.3. A summary for each view as identified in the Heritage Statement and Townscape Impact Assessment, is outlined below:

1. Tottenham Court Road along Chenies Street:
 - 8th floor only partially visible from this viewpoint;
 - Overall appearance would be minimal given set back additional storey;
 - The Tower would remain reflective of the adjacent Drill Hall tower, sustaining the visual relationship between the two.
2. West end of North Crescent:
 - 7th floor extension would not have a negative impact on this view;
 - 8th floor would be suitably set back to minimise visibility;
 - Proposed lift shaft would not impact on design quality of this elevation and would reflect the tower detail of Drill Hall.
3. East end of North Crescent:
 - 7th floor conversion would rationalise the appearance of the eastern part of the 7th floor;
 - Proposed 8th floor offices would essentially be invisible from this viewpoint;
 - Upward extension of lift core would appear as a seamless continuation of the existing tower feature.

4. Corner of Huntley Street and Chenies Street:
 - Main impact from increase lift tower and proposed 8th floor;
 - Tower would retain relationship with Drill Hall;
 - Additional height would neither obstruct any views beyond, nor be out of keeping with the mass of the rest of the building.
5. Gower Street along Chenies Street:
 - Increase in perceived massing would be minimal given screening provided by buildings closer to the view.
6. South Crescent along Alfred Place
 - Proposed extension would restore its role as the culmination of a progressing increase in height;
 - Set back 8th floor would have minimal impact on the existing character of the building.
7. Goodge Street over intervening buildings:
 - Longer distance position whereby 8th floor would be visible, but reminder of Whittington House is obscured;
 - Extension would be read independently from main body of Whittington House;
 - The glass materiality of this extension would present itself as an entirely independent piece of modern design and an attractive addition to the roofscape area.

6.21. In light of the above assessment, it is considered that the proposals accord with all design criteria in the Core Strategy (**Policy CS14**), Development Policies Document (**Policies DP24 and 25**) and Camden Policy Guidance document (**CPG1**), as the proposals will result in a development which is attractive, safe and easy to use whilst respecting the character setting, form and scale of the surrounding area. The development also proposed high quality materials which will match the existing building (where applicable) and not detract from the established character of Whittington House, where glazing is proposed.

Long Distance Views

6.22. As mentioned in section 5 of this report, the property is located on the outskirts of *Parliament Hill Oak tree to Palace of Westminster* viewing corridor. Given its location on the outskirts of this viewing corridor and when viewed in the context of surrounding buildings, it is not considered that the modest increase in height will have an impact on this view.

Daylight / Sunlight

6.23. The proposals have been designed to maximise the daylight and sunlight amenity of surrounding occupiers. A Daylight and Sunlight report has been undertaken by Malcolm Hollis and is included in this application. The assessment has been undertaken in accordance with Camden Council Planning Policy and the Building Research Establishment Report 'Site Layout Planning for Daylight and Sunlight' (BRE), and also, British Standard 8260 – 2: 2008.

6.24. In terms of daylight, 92 windows were tested with regard Vertical Sky Component (VSC) and all will continue to meet the BRE target values.

- 6.25. With regard to sunlight, 59 windows were tested for Annual Probable Sunlight Hours (APSH) and all will continue to meet the BRE target criteria.
- 6.26. Finally, in terms of overshadowing, the proposals will comply with BRE target criteria as the reduction in area receiving sunlight is less than 20%.
- 6.27. As such, the proposed development accords with **Policy DP26** of the Development Policies document and Camden Policy Guidance **CPG6: Amenity**.

Noise

- 6.28. A Noise Impact assessment has been prepared by the Equus Partnership which includes an Environmental Noise Survey to determine the typical prevailing background noise levels in the vicinity of the site. The report then provides Acoustic Design targets and gives a preliminary assessment of the proposed plant to be included.
- 6.29. The report concludes that *"No site specific of technological difficulties are envisaged with regard to the feasibility of complying with recommended acoustic design targets"*.

Transport

- 6.30. A Transport Statement has been prepared by Russell Giles Partnership (RGP), to assess the impact of the proposed development on the transport provision onsite and the surrounding highways infrastructure.
- 6.31. Whittington House currently accommodates 34 car parking spaces (including 1 disabled space), 5 motorcycles spaces and 85 bicycle storage points. As result of the proposed development and the relocation of plant material to the basement, there will be a loss of 8 car parking spaces and an increase of 3 bicycle storage points.
- 6.32. Given the sustainable location of the site and access to alternative modes of travel, as well as the currently under utilised car parking provision, it is not considered that the proposed development at Whittington House will have a significant impact on the surrounding highways infrastructure.
- 6.33. As such, the proposals accord with National, Regional and Local Highways planning policies, notably **Policy CS11** of the Core Strategy, and **Policies DP7, DP16 and DP18** of the Development Policies Document.

Energy

- 6.34. An Energy Statement has been prepared by Richard Hodgkinson Consultancy, which provides an Energy Strategy that has been formulated with regard to the London Plan Energy Hierarchy: **Be lean, Be Clean and Be Green**. The report includes the overriding objective to maximise CO₂ emissions with cost-effective, viable and technically appropriate approaches and a 1% reduction in Regulated CO₂ emissions is predicted.
- 6.35. The report concludes that Photo-Voltaic Cells and Air Source Heat Pumps are the most appropriate technologies for this proposal and they will therefore be installed. The incorporation of these technologies reduces Regulated CO₂ emissions by a further 42%, over **Be Lean** measures.
- 6.36. Overall, a combination of **Be Lean** and **Be Clean** measures will result in reductions in Regulated and Total CO₂ of at least 40% and 20% respectively, which meets the mandatory requirements of BREEAM Very Good.

Sustainability

6.37. A Sustainability Statement has also been prepared by Richard Hodgkinson Consultancy, which demonstrates that the proposed conversion and extension of Whittington House is considered sustainable.

6.38. The features in this statement can be identified as follows:

- *The proposed development will achieve a BREEAM 'Very Good' rating, representing a high level of sustainable design and construction;*
- *The refurbished building will benefit from the provision of energy efficiency measures aiming to achieve a reduction in regulated CO2 emissions of at least 40% over the Building Regulations (2010) baseline;*
- *All lighting will be energy efficient and adequately controlled;*
- *All lifts will be low energy and suitably sized;*
- *Water efficiency measures and devices will be installed to reduce the use of mains water;*
- *Recycling facilities will be provided for commercial and construction related waste;*
- *100% of the development will be located on previously developed land;*
- *The use of sustainable transport modes will be encouraged with the reduction of car parking provision and additional cycle storage;*
- *Where practical, building materials will be sourced locally to reduce transportation pollution and support the local economy. Materials will be selected based on their environmental impact, with preference given to 'A+' or 'A' rated materials from the BRE Green Guide to Specification where possible;*
- *Any features of ecological value will be adequately protected during construction;*
- *Sound insulation values are to be implemented to meet an appropriate standard of acoustic performance;*
- *Measures to minimise pollution during construction and post-construction will be implemented; and*
- *A 'beyond best practice' score will be achieved under the Considerate Constructor's Scheme.*

Planning Infrastructure Contributions

6.39. The London Borough of Camden has adopted Camden Planning Guidance **CPG8: Planning Obligations**, which establishes the potential Heads of Terms that will be included within S106 Agreements. This document also provides an indication of when and what payments might be accountable for a particular scheme.

6.40. Advice in this regard was provided within the pre-application response dated 15th April 2014, however it is important to note that these calculations were based on inaccurate floor calculations (i.e. NIA as opposed to GIA). Paragraph 6.9 of **CPG8: Planning Obligations** confirms that "*all figures are expressed as £ per square metre (gross external area)*".

6.41. Within the pre-application response, it was concluded that contributions would be sought with regard to: Training, Pedestrian; Cyclist and Environmental Improvements; and Public Open Space. In light of the alterations in floor area proposed since the pre-application discussions, if it proposed that the final amounts for these contributions be discussed during the course of the application.

6.42. In addition to the above, it is noted that the applicant proposed a payment in lieu with regard to Mixed Use **Policy DP1** of the Development Policies Document, which will also be discussed during the course of the application.

6.43. In addition, we are aware that there will be a Mayoral Community Infrastructure Levy (CIL) contribution payable in addition to any Section 106 Agreement.

7. CONCLUSION


- 7.1. Vail Williams LLP has been instructed by Platine Holdings Limited to submit the attached planning application for conversion of existing 7th floor to B1(a) Office (currently enclosed plant material, ancillary B1(a)), a modest infill extension to the 7th floor and the erection of an 8th floor, all for B1(a) office use at Whittington House, 19-30 Alfred Place.
- 7.2. The proposed development is required to provide additional office provision for existing tenants, who would otherwise have to re-locate to fulfil their requirements.
- 7.3. The scheme has been subject to much pre-application discussions with the London Borough of Camden Council and initial discussions with the Bloomsbury Conversation Area Advisory Committee. A number of considerations were raised during the pre-application stage, which have been addressed in this Full Planning Application via amendments to the design and further justification in key supporting documentation.
- 7.4. The existing 7th floor is considered ancillary to the existing office provision and as such benefits from use class B1(a). As such, planning permission is not required for the conversion of this floor to office use. The key areas for consideration in this application are therefore the infilling of the remainder of the 7th floor, which has the benefit of a positive pre-application response, and the erection of an 8th floor.
- 7.5. The design of the 8th floor extension was a key area of consideration and this has been altered to retain the existing, characteristic recessed 7th floor feature. Instead, a revised scheme has been carefully considered, with the input of an Heritage Consultant, resulting in a smaller 8th floor, which is set back from the main elevation at Alfred Place and which is constructed in sympathetic materials to ensure a subservient extension.
- 7.6. The nature of these amendments results in a scheme which will have limited impact on the surrounding Conversation Area, the key views as identified in pre-application discussions and the Richard Seifert and Partners design, itself. In addition, it is considered that the proposed development will reaffirm the importance of Whittington House, following the recent approval of the development at 31-34 Alfred Place.
- 7.7. The supporting documentation within this application provides a thorough assessment of the proposed scheme in terms of heritage, highways, noise, amenity (daylight/sunlight) and sustainability.
- 7.8. The Heritage Statement and Townscape Impact Assessment in particular, provides an in-depth review of the history of Whittington House, Bloomsbury Conversation Area, and nearby Listed Buildings. The document then provides a detailed assessment of proposed development by looking at its impact on key views in the immediate area, supported by verified visuals prepared by AVR London. This document concludes that *“the scheme’s impact s upon relevant heritage assets, townscapes and views would be very minor at most”* and *“Any negative impacts would be offset by the positive aspects of the design together with the benefits of increasing the amount of office space and contributing to the economic vitality of Bloomsbury”*.
- 7.9. We are aware that the proposal will attract certain contributions to be secured via a legal agreement and this is accepted by the applicant and will be a matter for negotiation during the course of the application.

7.10. The scheme has been designed to meet the requirements of an existing tenant and to accord with National, Regional and Local Planning Policy. It is considered that the development offers the following benefits:

- A development of high architectural quality which will make a positive contribution to the area;
- A development which is sympathetic to the surrounding Conservation Area, the importance of the existing building design and the key views in the vicinity;
- A highly sustainable and energy efficient building; and
- A development which maximises the potential of the site to provide new, high quality office space.

7.11. For the reasons set out above and within the remainder of the report, as well as the detailed assessments in accompanying reports, we respectfully request that planning permissions be granted for the proposed development.

Vail Williams LLP

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Legal statement

Vail Williams LLP, a Limited Liability Partnership, registered in England (number OC319702).

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Any reference to a Partner means a Member of Vail Williams LLP or an employee or consultant with equivalent standing and qualifications.

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APPENDIX 1

Pre-Application Meeting Minutes

P14-666 / Whittington House, Alfred Place, London

Minutes of Meeting

Meeting Held on: 26th March 2014
At: Bidborough House, 38-50 Bidborough Street, WC1H 9DB
10:00am

In attendance:

David Peres da Costa	(DC)	Planning Officer, Camden Council
Hannah Walker	(HW)	Conservation Officer, Camden Council
Roger Simmons	(RS)	Project Manager, CLQ Projects
Chris Wilmshurst	(CW)	Associate Planning Consultant, Vail Williams
Jen Sanders	(JS)	Planning Consultant, Vail Williams
Mark Howard	(MH)	Architect, TateHindle

Apologies: Nil

Action:

1 Introductions

2 Client Briefing

- RS explained reasoning behind application, i.e. anchor tenant requiring further office accommodation;
- The only option is to extend at roof level.

3 Planning and Design

- JS outlined the scheme as proposed in the pre-application;
- MH described design concept.

4 Adopted Planning Policy:

- Principle of Development
 - DC explained that in planning principle, an 8th floor could be added as long as it complied with other design principles and conservation concerns (as discussed below).
- Conservation Area
 - HW explained concerns regarding additional height to building; having worked on the scheme at 31-34 Alfred Place (next door), this was also a concern there and a happy medium had to be reached.
 - HW outlined the key concerns in relation to heights as:
 - Impact on Listed Building at 16 Chenies Place;
 - Prominent Long Distant Views from Tottenham Court Road and Goodge Street;
 - Views from the North and in particular along Chenies Place, North Crescent and Gower Street;
 - Whittington House is the largest building in the immediate area in terms of scale, footprint and height;
 - Note was made to its existing height being dominant and therefore require justification for going higher;

- HW also advised it would be wise to engage early with the Bloomsbury Conservation Area Advisory Committee as an objection from them would likely call a proposal to committee.

- Design

- In light of HW comments above, we would need to look at design amendments to address the concerns above and convince the Council that the proposal will not disrupt the Conservation Area;
- Particular regard to view points mentioned above;
- HW explained that the planning permission next door was proposed higher and that negotiations and design amendments incorporating a “wedding cake” tiered system on upper floors reduced the impacts of the development.

- Policy DP1 – Mixed Use

- JSA asked about the non-provision of residential on site, due to tenant requirements and feasibility of providing this in design terms;
- DC explained that this could be addressed via off-site provision or payment in lieu; DC to provide suggested figures in pre-app written response;
- DC to also provide comments on affordable housing figures;
- Other financial contributions?

DC

DC

5 Planning Application Documents

- JS provided list of planning consultants;
- DC to review and confirm requirements.

DC

6 Proposed Timelines and Meetings

- JS outlined proposed timings of submission on 1st May with anticipated committee of 10th July (if case cannot be delegated) which is 10 week timescale;
- HW advised that with upcoming elections and due to high workload, some cases are being carried over to next meetings and some additional meets may be scheduled; therefore no guarantee of dates, but timings acceptable in principle;
- DC advised that application would be called to members briefing if 3+ objections and/or objection from CAAC (Conservation Area Advisory Committee); they would decide whether to go to committee or not;
- CW asked about further design amendments and whether full pre-application would be required again;
- HW advised that given it is only design and impact on Conservation Area which is key, she would be happy to provide informal comments on revised scheme, if emailed over;
- DC anticipated written response in 2 weeks.

DC

7 AOB

- Nil

Vail Williams LLP



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Making commercial sense of property

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