

<b>Delegated Report</b>		<b>Analysis sheet</b>	<b>Expiry Date:</b>	26/04/2016
		N/A / attached	<b>Consultation Expiry Date:</b>	n/a
<b>Officer</b>			<b>Application Number(s)</b>	
Elaine Quigley			2016/2009/P	
<b>Application Address</b>			<b>Drawing Numbers</b>	
Development Site At Land Bounded By Drury Lane, Dryden Street, Arne Street And, Shelton Street London			See draft decision notice	
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>	
<b>Proposal(s)</b>				
Request for observations from the City of Westminster for demolition and redevelopment of site in buildings ranging from 5 storeys to 7 storeys (excluding roof top plant enclosures), including facade retention of 30-35 Drury Lane, 2 Dryden Street, 4-10 Dryden Street and 12 Dryden Street, in buildings to provide retail and restaurant/cafe uses at ground and basement level (Class A1/A3), 68 residential units (Class C3), cycle parking, basement car parking, associated landscaping works.				
<b>Recommendation(s):</b>	Objections			
<b>Application Type:</b>	Request for Observations to Adjoining Borough			

<b>Conditions or Reasons for Refusal:</b>	<b>Refer to Draft Decision Notice</b>					
<b>Informatives:</b>						
<b>Consultations</b>						
<b>Adjoining Occupiers:</b>	No. notified	<b>00</b>	No. of responses	<b>00</b>	No. of objections	<b>00</b>
			No. electronic	<b>00</b>		
<b>Summary of consultation responses:</b>	None received					
<b>CAAC/Local groups* comments:</b> *Please Specify	<p>Councillor Sue Vincent (Holborn and Covent Garden Ward Councillor) – objects on the following grounds:</p> <ul style="list-style-type: none"> <li>The proposal will significantly harm the Bloomsbury Conservation Area and the setting of the listed buildings surrounding the public realm on Great Queen Street including the Freemason’s Hall (Grade I listed building)</li> </ul>					

## Site Description

The application site skirts two streets which form the borough boundary between the London Borough of Camden and the City of Westminster. The streets in question are Drury Lane (on the eastern side of the site) and Shelton Street (on the northern side of the site). The immediate surroundings which fall within Camden form part of Sub Area 3 of the Seven Dials (Covent Garden) Conservation Area. On the Camden sides there are no listed buildings immediately adjacent to the site, although there are some on the corner of Shelton Street and Endell Street which are visible in the foreground of views of the site from Endell Street. The site is also visible in views to the north-west and south-east along Drury Lane, and in longer views to the north-east along Parker Street, the junction of which is immediately opposite the site.

This part of the Seven Dials (Covent Garden) Conservation Area is densely built up, with a small-scale grain derived from narrow plot dimensions. However, on the Camden side of Drury Lane development is of a relatively large scale due to the presence of the post-war New London Theatre, a large concrete and glass building with a footprint spanning the street block between Parker Street and Macklin Street. To the south-east of Parker Street, although narrow the buildings are tall. Generally buildings in Drury Lane are of four to five storeys.

To the north-west and south-west along Shelton Street and towards Endell Street, buildings are of a robust nature (both sides of Shelton Street contain former brewery buildings of a largish scale), and are noted in the conservation area statement to be 'generally higher' than elsewhere in the conservation area.

## Relevant History

Objections were raised by Camden on 14/01/2015 to the Request for observations application (Camden's ref 2015 4736/P) that was received from City of Westminster (15/07560/FULL) for demolition and redevelopment of site in buildings ranging from 5 storeys to 7 storeys (excluding roof top plant enclosures), including facade retention of 30-35 Drury Lane, 2 Dryden Street and 4-10 Dryden Street, in buildings to provide retail and restaurant/cafe uses at ground and basement level (Class A1/A3), 68 residential units (Class C3), cycle parking, basement car parking, associated landscaping and public realm works. Camden's objections related to:

- (i) the design including demolition of the north-western block facing Drury Lane and Shelton Street and its harmful impact on the setting of the Seven Dials (Covent Garden) Conservation Area, harming its character and appearance; and
- (ii) the transport issues including insufficient cycle parking, and the absence of car-free residential and commercial development would lead to increased vehicle movements in the surrounding streets.

## Relevant policies

### LDF Core Strategy and Development Policies

CS1 Distribution of growth

CS2 Growth areas

CS5 Managing the impact of growth and development

CS6 Providing quality homes

CS7 Promoting Camden's centres and shops

CS8 Promoting a successful and inclusive Camden economy

CS9 Achieving a successful Central London

CS11 Promoting sustainable and efficient travel

CS13 Tackling climate change through promoting higher environmental standards

CS14 Promoting high quality places and conserving our heritage

CS15 Protecting and improving our parks and open spaces and encouraging biodiversity

DP2 Making full use of Camden's capacity for housing

DP3 Contributions to the supply of affordable housing

DP5 Homes of different sizes

DP6 Lifetime homes and wheelchair homes

DP12 Supporting strong centre and managing the impact of food, drink, entertainment and other town centre uses

DP16 The transport implications of development

DP17 Walking, cycling and public transport  
DP18 Parking standards and limiting the availability of car parking  
DP22 Promoting sustainable design and construction  
DP23 Water  
DP24 Securing high quality design  
DP25 Conserving Camden's heritage  
DP26 Managing the impact of development on occupiers and neighbours  
DP27 Basements and lightwells  
DP28 Noise and vibration  
DP29 Improving access

Camden Planning Guidance (2015)  
Seven Dials (Covent Garden) Conservation Area Statement 1998

## **Assessment**

### **Proposal**

Request for observations from the City of Westminster for demolition and redevelopment of site in buildings ranging from 5 storeys to 7 storeys (excluding roof top plant enclosures), including facade retention of 30-35 Drury Lane, 2 Dryden Street, 4-10 Dryden Street and 12 Dryden Street, in buildings to provide retail and restaurant/cafe uses at ground and basement level (Class A1/A3), 68 residential units (Class C3), cycle parking, basement car parking, associated landscaping works.

Camden raised objections to the original application (see planning history above) on 14/01/2015. A further request for observations was received by Camden on 01/03/2016 following amendments to the original scheme. The main changes include:

- Façade retention of 12 Dryden Street
- Amendments to detailed design on other facades
- Reduction in the number of residential cycle parking spaces from 135 only accessible for Brompton fold-up bikes to 120 full sized spaces
- Increase from 9 to 12 cycle parking spaces for commercial units at ground floor level

### **Assessment**

The main considerations as part of the application are:

- Impact on conservation area
- Impact on highway network

### **Impact on Conservation Area**

It is considered that the additional height and bulk of the proposed development in the City of Westminster will not have an adverse impact on the setting of the Seven Dials (Covent Garden) Conservation Area and therefore no harm will be caused to its character and appearance. The retention of the facades of the south-eastern block, comprising an ordered classical Italianate facade on both Drury Lane and Dryden Street echoing the traditional urban grain of the area, is welcomed.

The additional height and bulk will be visible in long views from the south-east along Parker Street, however taller buildings within the City of Westminster rise above the proposed development, meaning no harm will be caused to views out of the conservation area.

Similarly, the additional height and bulk will be visible in views from the north-west, adjacent to listed buildings on the corner of Shelton Street and Endell Street. However, the height and bulk of the New London Theatre, situated further to the south-east, will tower over the proposed development, meaning no harm will be caused either to the surrounding conservation area or to the setting of listed buildings which are a sufficient distance away to not be affected.

However, the demolition of the north-western block, facing Drury Lane and Shelton Street, is considered by the London Borough of Camden to be unacceptable. The building in question is a red-brick and stone warehouse-style commercial building with fine metal casement windows and a decorative parapet line, which makes a positive contribution to the streetscape and to the setting of the Seven Dials (Covent Garden) Conservation

Area. As such, the building relates well to many properties in Drury Lane (both in Camden and Westminster) and in the tighter-knit development of Shelton Street, in terms of its height, bulk, scale and detailed design. It is therefore considered that its demolition would have an adverse impact on the setting of the Seven Dials (Covent Garden) Conservation Area, harming its character and appearance.

It is therefore recommended that the London Borough of Camden objects to the proposals contained in this planning application, due to the harm caused to the Seven Dials (Covent Garden) Conservation Area due to the loss of the north-western block on the site skirting Drury Lane and Shelton Street.

#### Cycle Parking

The proposal would provide 120 full sized, covered, secure and fully enclosed cycle parking spaces for the residential dwellings. This level of provision exceeds the minimum requirements of the London Plan which requires at least 108 long stay cycle parking spaces to be provided. However, it is worth noting that 69 of the cycle parking spaces would consist of cycle storage lockers capable of accommodating a fold-up bike such as a Brompton. These cycle lockers would not be able to accommodate a standard bicycle. Therefore, the proposal would only actually provide 66 covered, secure and fully enclosed cycle parking spaces for standard bicycles. The London Plan also requires at least 2 short stay cycle parking spaces to be provided (1 space per 40 residential dwellings). However, the proposal fails to provide any short stay cycle parking spaces for visitors to the residential element of the proposal. The proposed cycle parking arrangements for the residential element of the proposal therefore fail to comply with the minimum requirements of the London Plan.

The proposal has been amended to increase the covered, secure and fully enclosed cycle parking spaces for the retail units from 9 to 12. This level of provision exceeds the requirements of the London Plan which requires at least 10 long stay cycle parking spaces to be provided (from a threshold of 100 sqm: 1 space per 175 sqm). The London Plan also requires at least 22 short stay cycle parking spaces to be provided for visitors (from a threshold of 100 sqm: first 750 sqm: 1 space per 40 sqm thereafter: 1 space per 300 sqm). However, the proposal fails to provide any short stay cycle parking spaces for visitors to the retail units. The proposed cycle parking arrangements for the retail element of the proposal therefore fail to comply with the minimum requirements of the London Plan.

In summary, an objection should be made on the grounds that the proposal would fail to do enough to encourage and promote cycling as a healthy and sustainable mode of travel. The lack of cycle parking provision is indeed likely to encourage trips by less sustainable modes of transport such as private motor cars, taxis and car club vehicles.

#### Car Parking

Paragraph 6.94 of the Planning Statement (PS) submitted in support of the planning application states the following:

- The site has a PTAL rating of 6b, the highest possible rating, meaning the site has an excellent level of accessibility to public transport. Covent Garden underground station is closest to the proposed development, approximately 240 metres from the site, with Holborn, Leicester Square and Temple stations also in close proximity. The site is well served by bus, with 37 routes accessible within 640 metres of the site. There are five Cycle Hire Docking Stations within 500 metres of the site, providing access to approximately 166 bicycles. The site is very well served by public transport and provides an opportunity for a sustainable development in transport terms.

Paragraph 6.95 of the PS goes on to state that the site does not currently benefit from any on-site car parking facilities.

Paragraph 6.98 of the PS states:

- The proposals include the provision of a basement car park, which provides 31 car parking spaces for residents. The car park is entered via two car lifts which are provided in the existing servicing location on Arne Street. Two lifts are proposed to reduce potential waiting times and also to provide greater resilience in the unlikely event that one of the lifts breaks down. Three of the proposed spaces are provided as disabled car parking spaces. A total of 20% of the car parking spaces will be provided with electrical charging points, with a further 20% provided with passive provision in order to futureproof the scheme. The ratio of car parking spaces to units is 0.46.

The need for any on-site car parking facilities must be questioned regardless of the City of Westminster's parking standards for residential developments. The NPPF strongly encourages sustainable development, including trips by sustainable modes of transport. The site has the highest possible PTAL rating which suggests that car parking facilities are not required except for essential users such as blue badge holders. The car parking proposals would encourage private car ownership and usage as an alternative to more sustainable modes of transport such as walking, cycling and public transport. In addition, the proposal would do nothing to address existing air quality issues in London. The proposed arrangements appear to be contrary to Westminster UDP Policies S41, TRANS 15 and TRANS 23 (see Summary and Conclusions below).

Paragraph 6.101 of the PS states:

- The Transport Statement prepared by Curtins in support of this planning application provides an analysis of car availability in the area, which indicates that within St James Ward less than 32% of households have access to a car. On the basis of closer analysis of a smaller output area, car availability was identified to be significantly lower at 16%. In addition car ownership trends in the local area indicate that car ownership levels are decreasing.

The above statement confirms that private car ownership in the local area is very low with only 16% of households having access to a private motor vehicle. It is unclear why the applicant would wish to exceed this level of car parking so significantly by proposing a level of car parking provision 3 times higher than local levels.

Paragraph 6.103 states:

- The applicant proposes to provide membership of a car-club scheme for each household which has not been provided with an allocated parking space for 25 years as a mitigation measure to minimise any potential increase in demand for parking on street. The applicant is willing to enter into a legal agreement as required in order to secure this contributions as part of the proposed development.

Policy 6.13 (Parking) includes the following statement on the summary page:

- in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people)

It is not clear if the proposal would actually provide any dedicated wheelchair housing units. However, the proposal to provide 31 general car parking spaces would be contrary to Policy 6.13 based on the PTAL rating of 6b being the highest achievable.

The need to provide membership to a car club scheme must be questioned. As already mentioned, the NPPF strongly encourages sustainable development, including trips by sustainable modes of transport. The site has the highest possible PTAL rating which suggests that motor vehicle use is not required. The proposal to provide car club memberships to residents would encourage and promote motor vehicle usage as an alternative to more sustainable modes of transport such as walking, cycling and public transport. In addition, the proposal would do nothing to address existing air quality issues in London.

### Summary and Conclusions

Paragraph 6.90 of the PS states:

- The NPPF put emphasis on the need to facilitate sustainable development and reducing the need to travel. Paragraph 29 identifies that the transport system needs to be balanced in favour of sustainable transport modes. Paragraph 32 of the NPPF requires that all development which generate significant amounts of movement should be supported by a Transport Assessment and that decisions should take account of whether: opportunities for sustainable transport modes have been taken up depending on the nature and location of the site; safe and suitable access to the site can be achieved for all people; and that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

Paragraph 6.91 of the PS states:

- The London Plan echoes the transport objectives in the NPPF, and also sets maximum parking standards and minimum cycle parking standards. Westminster's City Plan: Strategic Policies Policy S41 requires that cycling facilities are provided within all new developments, and that reliance on private motor vehicles is reduced.

Paragraph 6.92 of the PS states:

- UDP Policy TRANS 15 seeks to increase the use of public transport, cycling and walking as viable alternatives to motor vehicles and reduce the use of private motor vehicles. UDP Policy TRANS23 advises that on-site parking should be provided where appropriate and practical.

The proposal would be contrary to various policy considerations of the NPPF, London Plan and UDP. The car parking and car club membership proposals would generate additional motor vehicle trips in the local area. Observations suggest that the Central London Area suffers from traffic problems such as congestion and air quality, particularly during peak periods. The proposal would merely exacerbate these existing problems. Indeed, the London Borough of Camden would end up suffering the consequences as the additional motor vehicle trips associated with the proposal would most probably take place within the borough. This would be counter-productive to our own transport strategy objectives which include reducing motor vehicle trips in the borough. The revised cycle parking proposals would fail to adequately encourage and promote cycling as a healthy and sustainable mode of transport. This would in turn encourage and promote the use of private motor vehicles and car club vehicles.

It is recommended that an objection be lodged with the City of Westminster based on the above points. However, should planning permission be granted, it is recommended that the following mitigation measures be secured as section 106 planning obligations:

- Car capped development (to prevent residents from obtaining on-street parking permits)
- Parking management plan (car parking, motor cycle parking and cycle parking)
- Basement construction plan
- Construction management plan (to include demolition and basement excavation works)
- Financial contribution for highway remedial and public realm improvement works directly adjacent to the site (including implementation of PERS audit recommendations)
- Travel plan
- Servicing management plan
- Approval in principle (relates to basement excavations directly adjacent to the public highway)

### **Conclusion**

Camden object to the proposal due to the harm caused to the Seven Dials (Covent Garden) Conservation Area, and highway and transport grounds including inadequate short stay cycle parking arrangements for visitors for the residential and retail element of the proposal, additional car parking spaces and car club membership that would encourage private car ownership and usage as an alternative to more sustainable modes of transport such as walking, cycling and public transport.