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*By email*

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Dear Mr Price,

### **Pre-planning Application Advice**

#### **Proposal at 20 Red Lion Street, London WC1R 4PQ**

Thank you for submitting a pre-planning application enquiry for the above property which was received on 18<sup>th</sup> April 2016. A site visit was undertaken on 17th May 2016 with both me and Conservation Officer Sarah Freeman.

I understand the proposals are as follows;

- Alterations to change all single glazed windows on the whole building
- Alterations to reception entrance to the front
- Re-cladding of rear elevation
- 6th floor addition with the relocation of roof top plant above(it has been described as a 5<sup>th</sup> floor mezzanine, however in our opinion it constitutes a new floor)
- Removal of car parking to the rear and new cycle spaces to the ground and basement levels

This proposal would result in an increase of circa 925m2 GEA.

## **Relevant policies and guidance**

National Planning Policy Framework 2012

The London Plan March 2016

## **LDF Core Strategy and Development Policies**

Core Strategy

CS1 Distribution of growth

CS2 Growth areas

CS3 Other highly accessible areas

CS4 Areas of more limited change

CS5 Managing the impact of growth and development

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

CS18 Dealing with our waste and encouraging recycling

## **Development Policies**

DP1 Mixed use development

DP2 Making full use of Camden's capacity for housing

DP5 Homes of different sizes

DP13 Employment sites and premises

DP16 The transport implications of development

DP17 Walking, cycling and public transport

DP18 Parking standards and limiting the availability of car parking

DP19 Managing the impact of parking  
DP20 Movement of goods and materials  
DP21 Development connecting to the highway network  
DP22 Promoting sustainable design and construction  
DP24 Securing high quality design  
DP25 Conserving Camden's heritage  
DP26 Managing the impact of development on occupiers and neighbours

### **Camden Planning Guidance**

CPG1 Design 2015  
CPG2 Housing  
CPG3 Sustainability 2015  
CPG5 Town centres, retail and employment 2015  
CPG6 Amenity 2011  
CPG7 Transport 2011  
CPG8 Planning Obligations 2015  
Bloomsbury Conservation Area Statement (April 2011)

### **Site**

The site is located at the junction of Red Lion Street and Sandland Street. It comprises a large office building with the entrance on Sandland Street. The site is not listed but is located within the Bloomsbury Conservation Area.

### **Assessment**

The principle issues for consideration are:

- Land use (Creation of B1 floorspace)

- Design
- Amenity
- Transport
- Other Matters

## **Land Use**

### **B1 office**

Policy CS1 (Distribution of Growth) seeks to focus Camden's growth in the most suitable locations specifically in highly accessible locations, in particular Central London and Policy CS8 (Promoting a Successful and Inclusive Camden Economy) seeks to ensure that the borough retains a strong economy. It seeks to do this by, amongst other things, safeguarding existing employment sites that meet the needs of modern industry and employers and provide facilities for small and medium sized enterprises.

The proposal increases the office floorspace by around 900 square metres floor area, this is welcome in this Central London Area. The development should consider the ability to provide for small and medium sized enterprises, allowing flexibility within the proposed floorplates. The increase in employment floor space is welcomed and in accordance with Policy DP13.

### **C3 Residential**

DP1 – Mixed use development states that the Council will require a mix of uses in development where appropriate in all parts of the borough, including a contribution towards the supply of housing. In the Central London Area where more than 200sqm(gross) additional floor space is provided, we will require up to 50% of all additional floor space to be housing. You would be expected to revise plans to accommodate residential floorspace on site. Quality of residential accommodation

Any proposed residential floorspace is expected to comply with the requirements of CPG2-residential development standards and London Plan standards. The size of the units would be expected to comply with both the London Plan and Camden's own residential development standards. All rooms should be expected to have good access to natural light and ventilation. The outdoor spaces would be expected to accompany the residential floorspace where possible.

The residential unit would be expected to have its own separate access isolated from the access to the office for safety and security.

### *Housing Mix*

Policy DP5 – states the Council will contribute to the creation of mixed and inclusive communities by securing arrange of self-contained homes of different sizes with the priorities table below. When considering proposing new residential accommodation, it would be expected to meet the priorities within the tables below.

<b>Dwelling Size Priorities Table</b>					
	<b>1-bedroom (or studio)</b>	<b>2-bedrooms</b>	<b>3-bedrooms</b>	<b>4-bedrooms or more</b>	<b>Aim</b>
<b>Social rented</b>	lower	medium	<b>high</b>	<b>very high</b>	50% large
<b>Intermediate affordable</b>	medium	<b>high</b>	<b>high</b>	<b>high</b>	10% large
<b>Market</b>	lower	<b>very high</b>	medium	medium	40% 2-bed

### *Refuse and Recycling*

It is required that any residential accommodation would be expected to comply with Chapter 10 of Camden Planning Guidance 1 (Design) sets out Camden’s requirements for waste and recycling storage in detail, further details of this should be submitted with the application and shown on the proposed drawings.

### **Design**

The site is located within the Bloomsbury Conservation Area and occupies a corner plot at the junction of Red Lion Street and Sandland Street, its prominence emphasised by the fact that the building line to the east of the site is substantially set back, reflecting the historic street layout that was altered following bomb damage to the area. As a result the building is highly visible in views from the entrance to Gray’s Inn to the east, in long views looking east along Eagle Street, and to, a lesser degree, in views looking south down Red Lion Street.

The surrounding context is mixed, with the large massing of the landmark Mid City Place located to the south of the site. Red Lion Street is characterised by variety of uses, ages and scales of buildings, although the prevailing type remains to be terraced houses with ground floors converted to shops.

The views submitted as part of the pre application are within a fairly close range to the site. It is recommended that further views are presented as the scheme progresses, showing the building from farther away to enable the full impact of the proposals to be considered.

It is recommended that the applicants engage with the Bloomsbury Conservation Area Advisory Committee to seek their views on the proposals, including the principle of additional height to the building, prior to bringing forward a full application.

### *Roof extension*

The proposed roof extension and roof plant in zinc clad adds a new full storey to the buildings. Given the surrounding varied context of buildings of a range of scales and massing, it is considered that, in terms of scale and massing, the existing building can accommodate an additional storey without causing an unacceptable level of harm to the conservation area, the existing townscape character and the setting of nearby listed buildings. The principle of such proposal is considered acceptable, however there is some concerns with regards to the design which is explain in the paragraph below.

Camden Planning Guidance 1 (Design) discusses in detail about when a roof extension would be considered unacceptable. Paragraph 5.8 says that a roof alteration or addition is likely to be unacceptable where there is likely to be an adverse effect on the skyline, the appearance of the building or the surrounding street scene. As mentioned above, the proposal is considered acceptable in principle, but the design and form is expected to need changing.

It is recommended that further consideration should be given to the design approach. It appears that the proposed raking of the additional storey has been conceived with the aim to minimise its appearance when viewing the building from street level and to be read from the sides and rear as a modern interpretation of a mansard roof form. The overall form and character doesn't outwardly relate to that of the existing building, which has a strong geometric form with horizontal emphasis. It is considered that alterative options for the form and massing of the additional storey should be considered, including continuation of the existing building line. Given the altered character of the host building and the surrounding context, it is considered that the building can take a visible addition, that complements the building rather than trying to be invisible, which given the linear views of the site won't be achievable. However all visual impacts of these alternatives should be considered, as outlined above, in longer views of the site.

### *Roof plant*

It is noted that the proposals incorporate a raised plant enclosure, which would be visible above the height of the proposed additional storey. This is considered to be unacceptable, and all proposed plant should be incorporated within the envelope of the proposed additional storey. If this puts pressure of the amount of floorspace available, consideration could be given to extend out further to the rear, subject to testing of any impacts. The proposed roof plant enclosure would be clearly visible from long views and would add unacceptable bulk and mass Red Lion Street as is designed as a complete composition with the existing roof would be undermined by the addition as proposed. The roof plant enclosure would be an incongruous addition to the roofscape, causing harm to the character and appearance of the host buildings and the Bloomsbury Conservation Area contrary to policies DP24 and DP25.

### *Proposed rear extension*

Following assessment on site, It is considered that the building being extended outwards in design terms would be acceptable. The existing building has a narrow L shaped footprint, with its rear massing only perceived from within the mews buildings courtyard to the rear of the site. Consideration has been given to how the projections would interact with adjacent buildings and to replicating the fenestration pattern of the existing building, therefore this extension is considered acceptable.

### *Alterations at ground floor level*

It is considered the proposed relocation of the entrance to the corner and proposed continuation of the black stone cladding at ground floor level to Red Lion Street would be acceptable. The proposed changes are considered to be sympathetic to the host building and would respect the detailed design and architectural features of the existing, therefore this extension is considered acceptable. This complies with policies DP24 and DP25 as well as guidance in chapter 7 of CPG1.

### **Amenity**

Given the location of the roof extension being a considerable distance away from the nearest residential at ground level at the rear, it is unlikely that the development would result in a loss of sunlight/daylight or outlook to any adjacent residential units.

However due to the location and size of the rear extensions it is considered it may create a harmful amenity impact towards the neighbouring residents nearby a daylight/sunlight assessment report would be required to be submitted prior to registering the planning application.

## **Transport**

DP17 (Walking, cycling and public transport) seeks to promote sustainable travel options and Policy DP18 (Parking standards and limiting the availability of car parking) expects new developments to be car free. The site's location is within Central London and has an excellent PTAL of 6B.

The Council expects development to be car free in the Central London Area. A s106 legal agreement for the new residential floorspace to be car-free would be expected to be secured.

### *Cycle Parking*

Policies CS11 and DP17 support cycle provision and Camden's parking standards for cycles states that one cycle parking space is required per residential unit. Changes to the London Plan recently adopted require 1 cycle space per 150sqm for long stay users and 1 per 500sqm for the first 500sqm for short stay users. Your proposal is welcomed in principle as it encourages cycling and reduce the dependant of on cars.

While 13 cycle parking for long stay is London Plan Compliant with the uplift of floorspace forming part of this scheme, we would expect to request the whole building be borough up to standard with 30 Long stay and 8 short stay spaces that meet our Cycle design guidance. Guidance can be found on Camden planning Guidance 7: Transport, section 9.

We would also advise you make a Pedestrian, Cycling and Environmental contribution to help support their application and help the council to continue to improve cycling and walking route in the area. We have a major scheme in the area called the High Holborn scheme which employees and visitor to this site would directly benefit from.

### *Construction Management Plan*

The development is likely to require a Construction Management Plan (CMP) prior to the implementation of the development, to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. This will be secured via a section 106 agreement. You are recommended to submit a draft CMP within the application should you submit one.

Where a proposed scheme includes demolition, CMPs are required to address the approach to be taken to demolition as well as construction works. Where a two-stage process is specified in the s106 (a Demolition Management Plan to be followed by a



Construction Management Plan), a single support contribution will be sought, covering the overall costs involved in supporting the implementation of these obligations. The CMP Implementation Support Contribution will be used to fund the specific technical inputs and sign off that are required to ensure that the obligation is complied with and ensure that the planning objectives we are seeking to secure are actually achieved.

<b>Construction/ Demolition Management Plans: implementation fee: indicative charging rates</b>	
Small/ less complex (0-10 homes/ 0-1999sqm other uses)	<b>£1,140</b>
Medium size and complexity (10-50 homes, 2000-4999sqm other uses)	<b>£3,240</b>
Major and complex applications (50-499 homes/ 5,000-9,999sqm other uses)**	<b>£7,620</b>

An advice note is attached and details of this are also available online here: [www.camden.gov.uk/s106](http://www.camden.gov.uk/s106). The fee will be payable alongside other obligations to the planning obligations team.

We would like a Draft CMP to support the application, with the intention to request a full CMP if approved.

### *Highways Contribution*

Further, Development Policy DP21 states that 'The Council will expect works affecting Highways to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces following development'. The footway and vehicular crossover directly adjacent to the site could be damaged as a direct result of the proposed works. We would therefore need to secure a financial contribution for highway works as a section 106 planning obligation if planning permission is granted. Such a contribution may be refunded subject to the roadway and footway being left in an acceptable condition (as inspected by the council) following the completion of the works.

### *Pedestrian, Cycling, Environmental and Public Realm Improvements*

The Council is currently involved in a major transport and public realm schemes in the area to address a number of significant challenges including road traffic casualties, congestion, poor air quality, traffic dominance, insufficient space for high volumes of pedestrians and cyclists, and a lack of high quality public space.

The High Holborn Scheme is in its early stages and we would welcome input from the applicant as to how we can further help the new occupiers of the site, the scheme will already help to improve the safe travel of their staff to and from the site by sustainable transport modes. Traffic modelling and urban design consultants have been commissioned to develop transport and urban realm proposals for the area. To help support this scheme we therefore seek to secure a financial contribution of £10,555 as a section 106 planning obligation.

### **Other Matters**

#### *Sustainability/energy matters*

All applications should demonstrate that they meet sustainable design principles as noted in policies; CS13 (Tackling climate change through promoting higher environmental standards) and DP22 (Promoting sustainable design and construction) requires development to demonstrate that sustainable design standards are integral to the proposal.

The policies are expecting non-domestic developments of 500sqm of floorspace or above to achieve “very good” in BREEAM assessments and “excellent” from 2016 and encouraging zero carbon from 2019. In respect of residential units to be provided to comply with policy DP1 as mentioned above.

In respecting in meeting policy DP1 as mentioned above in the Land Use chapter, Any new residential development (adding 1 dwelling or more) (unless new majors) will be expected to achieve the following standards:

- 20% of the energy reduction should be from renewable technologies, where feasible.
- Water efficiency of 110 litres per person per day

It is expected that the above would be demonstrated within a submitted sustainability statement with an application.

### *Green and brown roofs and greenwalls*

Green and brown roofs and green walls play important roles in achieving a sustainable development. They retain rainfall and slow its movement, provide additional insulation, provide valuable habitat to promote biodiversity, provide opportunities for growing food, reduce the heating up of buildings and the wider city and provide valuable amenity space. They should be designed to enable the benefits that are most suitable for the site. This will include ensuring a sufficient soil depth is provided and selecting the correct substrate and vegetation. The design of green walls should ensure sufficient irrigation for plants without the need for excessive energy consumption for pumping water. It would be expected to be proposed on the roof of the extensions.

### *S106 agreement*

Should the any form of development be considered acceptable, there would be a requirement for the applicant to enter into a Section 106 agreement. The Section 106 would be intended for two separate purposes, (1) to secure a Construction Management Plan (CMP), (2) to secure a financial contribution to protect the highway/footway for the duration of the works, (3) to secure a financial contribution for Pedestrian, Cycling, Environmental and Public Realm Improvements and (4) Car-free agreement for the new residential units

### *Building Control*

Please consider use of Council's Building Control services for assessment of the final build drawings. For more information, please visit their website, <http://www.camden.gov.uk/ccm/navigation/environment/building-control/>.

### *Certificate of Ownership*

Please note that as the proposal includes works to party walls it would be necessary to notify all freeholders and leaseholders of the adjoining sites prior to submitting the application. Certificate of Ownership B should be completed on the application form.

### **Required Documentation**

Please submit the following documentation with the application:

- All relevant architectural drawings (inc. detailed sections and site plan)
- Design, heritage & Access Statement
- Draft Construction Management Plan
- Sustainability statement
- Daylight/Sunlight report
- Complete CIL form
- Air quality assessment report

## **Conclusion**

In summary, the alterations to; Change all single glazed windows on the whole building to reception entrance to the front; Re-cladding of rear elevation with extension depth; 6th floor addition; Removal of car parking to the rear and new cycle spaces to the ground and basement levels are considered acceptable in principle. However, the design of the extensions and relocated roof plant enclosure is likely to be considered favourable subject to revisions in accordance to recommendations set out above.

It is noted, that you have not considered policy DP1 in including residential floorspace to comply with this mixed-use policy in this Central London area location. Please revise your plans to accommodate adequate residential floor space ensuring it has separate access to it and indication of cycle parking and waste/refuse/recycling storage for it.

Should you wish to submit a formal planning application, you are encourage in any prospective submission, the proposals are considered in principle, however the relocated roof plant and proposed extensions would need to be designed carefully on would need to integrate successfully with the remainder of the property, adjoining buildings and the Bloomsbury Conservation Area.

Please note that the information contained in this letter represents an officer's opinion based on the level of information supplied and is without prejudice to the further consideration of this matter by the Development Management section or to the Council's formal decision.

I trust this information is of assistance. Should you have any further queries please do not hesitate to contact me by telephone on 020 7974 4546.

It is important to us to find out what our customers think about the service we provide. To help, we would be very grateful if you could take a few moments to complete our [pre application enquiry survey](#). We will use the information you give us to monitor and improve our services.

Regards,

Raymond Yeung

Planning Officer

Telephone: 020 7974 4546

*This letter represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.*