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SERVICES TRUST COMPANY
LIMITED AND BNP PARIBAS
SECURITIES SERVICES TRUST
COMPANY (JERSEY) LIMITED AS
TRUSTEES OF THE MAYFAIR
CAPITAL COMMERCIAL PROPERTY
TRUST**

**20 RED LION STREET, LONDON,
WC1R 4PQ**

**PLANNING AND HERITAGE
STATEMENT**

**PROPOSED ROOF AND REAR
EXTENSION FOR ADDITIONAL
OFFICE ACCOMODATION,
CHANGES TO EXISTING ENTRANCE
AND MINOR CHANGES TO EXISTING
FACADES**

OCTOBER 2016

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APPENDICES

- 1.0 LBC Planning Pre-Application Advice Letter, dated 21 June 2016
- 2.0 Correspondence from LBC confirming permitted non-compliance with Policy DP1 of the Development Policies Document.

1.0 EXECUTIVE SUMMARY

1.1 This Planning Statement (“the / this Statement”) has been prepared by Montagu Evans LLP as part of an application for detailed planning permission (“the / this Application”) by BNP Paribas Securities Services Trust Company Limited and BNP Paribas Securities Services Trust Company (Jersey) Limited as trustees of the Mayfair Capital Commercial Property Trust (“the Applicant”) for development at 16-20 Red Lion Street, London (“the Site”).

1.2 The Site is situated in Bloomsbury, within the planning jurisdiction of the London Borough of Camden (“LBC”) and comprises a site area of approximately 874 sqm. A location plan showing the Site in the context of the surrounding area is included within this Application.

1.3 The description of development for the application scheme (“the Scheme”) is as follows:

“Extension To Rear Of Building, Replacement Of All Existing Single Glazed Windows, Roof Extension And Roof Top Plant, New Reception Entrance Along Red Lion Street And Sandland Street”

1.4 The Scheme has evolved following pre-application discussions with LBC officers and consultation with local stakeholders, including the Bloomsbury Conservation Area Advisory Committee (“BCAAC”).

1.5 This Application has been informed by adopted and emerging development plan policies and other relevant guidance (**Section 5**).

1.6 The Scheme seeks to provide an additional 807 sqm (GIA) of office floorspace to the existing building through the construction of roof and rear extensions. The provision of further office floorspace would contribute positively to the delivery of employment floorspace within Central London (**Section 6**).

1.7 The Scheme seeks to apply a high quality design which promotes sustainability measures throughout its design, construction and lifetime of the extensions and existing building (**Section 6**).

1.8 The Scheme would not negatively impact on the privacy and daylight and sunlight of existing neighbouring properties (**Section 6**).

1.9 The Scheme would be a car-free development, however access and parking to the electrical sub-station would be retained. 11 cycle spaces would be provided, allowing for a total of 27 when considering the 16 spaces available for the existing building (**Section 6**).

- 1.10 The waste and refuse facilities on Site are in line with national and local requirements.
- 1.11 This Application represents an opportunity to utilise a Site to provide additional office floorspace that is both suitable for the Site, accords with relevant planning policies and is viable to develop.
- 1.12 The Scheme is in accordance with the relevant National Planning Policy Framework. Guidance, the Core Strategy and other local development plan documents.
- 1.13 In light of the above, we respectfully request that LBC grants approval for these proposals.

2.0 INTRODUCTION

- 2.1 This Planning Statement (“the / this Statement”) has been prepared by Montagu Evans LLP as part of an application for detailed planning permission (“the / this Application”) by BNP Paribas as Trustees of the Mayfair Capital Commercial Property Trust (“the Applicant”) for development at 16-20 Red Lion Street, London (“the Site”).
- 2.2 The description of development for the application scheme (“the Scheme”) is as follows:

“Extension To Rear Of Building, Replacement Of All Existing Single Glazed Windows, Roof Extension And Roof Top Plant, New Reception Entrance Along Red Lion Street And Sandland Street”

- 2.3 Full details of the proposals are set out in the Design and Access Statement, prepared by ORMS, which forms part of this application.

Purpose and Format of the Planning and Heritage Statement

- 2.4 The purpose of this Planning and Heritage Statement is to provide information to allow the necessary consideration of the development proposals against all relevant planning policy and all other material considerations. The Statement sets out how the relevant planning policies and other key material considerations to the determination of the application have been taken into account.
- 2.5 The Planning and Heritage Statement forms part of the information which has been submitted with this application, and is to be read in conjunction with the following documents:

- Application drawings, prepared by ORMS;
- Design and Access Statement prepared by ORMS;
- Air Quality Assessment, prepared by XCO2;
- Daylight and Sunlight Report, prepared by Delva Patman Redler;
- Energy and Sustainability Statement, prepared by GDM;
- BREEAM Assessment, prepared by GDM;
- Acoustic Survey, prepared by Sandy Brown;
- Archaeological Assessment, prepared by Pre-Construct; and
- CIL Form, prepared by Montagu Evans LLP.

- 2.6 This Planning Statement demonstrates that the Scheme:
- Has been prepared within the context of and is informed by pre-application discussions with the local planning authority;
 - Delivers high quality office floorspace;

- Does not have an unacceptable impact in terms of daylight and sunlight for existing neighbouring properties; and
- Is in accordance with relevant planning policy at the national, regional and local level and constitutes sustainable development.

2.7 **Section 3** of this statement provides background information on the Site and its planning history, and **Section 4** sets out the application proposals. **Section 5** summarises the planning policy relevant to the Site and the proposals are assessed against the policies in **Section 6**. An overview of planning obligations and Mayoral CIL arising from the development as set out at **Section 7**. A Heritage and Townscape Assessment is provided at **Section 8**. A summary and conclusions are contained within **Section 9**.

Consultation

- 2.8 Pre-application advice has been provided by the London Borough of Camden (“LBC”) Planning Officers. A copy of the pre-application letter received from LBC can be found at Appendix 1. This has informed the scheme which has been revised to address comments raised through the pre-application consultation process.
- 2.9 Correspondence has been held with various individuals at the LBC in response to pre-application advice which outlined a requirement for 50% of all net additional floorspace to be provided as housing.
- 2.10 In correspondence received on 12 August 2016 (**Appendix 2**) from LBC, it was agreed that the requirement, contained within Policy DP1 of the Development Policies DPD, would not be applicable to proposals for the Site due to the impracticalities of providing residential floorspace within the building.
- 2.11 A payment-in-lieu is instead proposed.
- 2.12 A meeting was held with the Bloomsbury Conservation Area Advisory Committee (“BCAAC”) on 28 September 2016 to discuss the proposals. The meeting was positive in principle and we await formal comment.

3.0 SITE LOCATION AND PLANNING HISTORY

The Application Site

- 3.1 The Site is situated within the administrative area of the LBC, comprising a site area of approximately 874 sqm.
- 3.2 The Site is situated in the Central London Area of the borough. A location plan showing the Site in the context of the surrounding area is included within the Application.
- 3.3 The existing building consists of six storeys of office accommodation (Basement + Ground + 4 storeys) (Use Class B1). The office floorspace is accessed directly from street level on the ground floor at Sandland Street. Service access is made from a separate access along Sandland Street, which leads to the rear of the building.
- 3.4 The current building was constructed in the 1950s and contains architectural features often attributed to architects such as Walter Gropius and Mies Van der Rohe, both pioneers of the 'Bauhaus' school of architecture. The building was originally clad in brick and later rendered.
- 3.5 The building is L-shaped and occupies the south western section of the Site. A yard area with car parking and electric sub-station occupies the north eastern section of the Site.
- 3.6 The Site does not contain, any statutory or non-statutory listed buildings. The Site is located in the Bloomsbury Conservation Area.

Site Location

- 3.7 The Site is surrounded by a range of uses, including both residential and non-residential uses. Adjoining the Site:
- East, by the Old Nick public house and Nos. 20 and 22 Sandland Street, operating as a recruitment agency. Three Cups Yard, a residential development, accessed from Sandland Street, is located to the north east of the yard area of the Site;
 - South, by MidCity Place, a 10 storey office building. Several retail units are located on the ground floor of the building, however these are some distance from the Site;
 - West, on the opposite side of Red Lion Street, by No. 64 Red Lion Street, a 7 storey (Ground + 6 storeys) residential building. Council tax records suggest there are 14 units within the building;

- North, by Nos. 21-23 Red Lion Street, a row of 5 storey terraced properties, known as Blueprint Living Apartments. Council tax records suggests there are 14 units contained within the building.

3.8 The principal entrance to the Site is on Sandland Street. The entrance provides access to the office floorspace on all floors via a central reception area.

3.9 The current entrance was constructed in 1999 and further altered in 2012, having been previously located at the corner of Red Lion Street and Sandland Street.

Accessibility

3.10 The Site has Public Transport Accessibility (PTAL Rating) of 6b, which is considered to be 'excellent', as it is located in close proximity to a variety of public transport routes.

London Underground Accessibility

3.11 Holborn Underground Station is located approximately 320 metres to south west of the Site. Services run on the Central and Piccadilly lines from this station into other areas of Central London as well as to the East and West. Chancery Lane Underground Station is located approximately 450 metres to the south east of the Site and provides Central Line services.

Train Accessibility

3.12 The Site is also served by the Farringdon National Rail Station, located approximately 1.3km to the east. Services from the station include the Thameslink route to Bedford, Sutton, St Albans City, Brighton and Luton, and a number of other locations. The Elizabeth Crossrail line is scheduled to open in December 2018 which will provide regular services in each direction between Paddington and Abbey Wood.

Bus Accessibility

3.13 The Site is highly accessible to London's bus network. A bus stop is located approximately 300 metres to the south of the Site on High Holborn. There are several other bus stops, within close proximity, along High Holborn and Theobald's Road.

Planning History

3.14 A review of the planning records held by LBC has revealed that there have been a number of applications submitted for the Site, over the past 20 years.

3.15 On 18 September 1995 an application (ref. 9501647) was submitted for the change of use of the ancillary office car park to the rear of the property to a public car park. The application was refused on 3 November 1995 on the grounds that the use of the area as a public car park was contrary to the Council's policy prohibiting public off-street

car parking. An appeal was submitted and subsequently dismissed on the grounds that the proposals might increase parking demand and cause localised pressure.

- 3.16 Permission was granted on 6 February 1997 for external alterations, including partial recladding (ref. PS9604263). The application established the current location of the main entrance, being moved from the corner of Red Lion Street and Sandland Street to being on Sandland Street.
- 3.17 The electrical substation to the rear of the Site was constructed after permission was granted on 9 January 1998 (ref. PS9705208).
- 3.18 Permission was granted on 23 January 1998 for the addition of a wall mounted condenser and ventilation louvres to rear elevation (ref. PS9705200).
- 3.19 On 2 July 2012 permission (2012/2483/P) was granted for the removal of existing glass block wall and stone cladding at the entrance to the building and replacement with granite cladding and new windows to ground and first floor level. The works have since been implemented and form the current entrance.
- 3.20 An application to vary Condition 3 of permission ref. 2012/2483/P was submitted on 21 November 2012. The application sought minor material amendments to retain stone clad column. Permission was granted on 8 January 2013. The permission has since been implemented.

4.0 DEVELOPMENT PROPOSALS

4.1 As set out in **Section 2** of this Statement, the Application proposes the extension of the existing building at roof level and the construction of a five storey (ground + 4 floors) extension to the rear. A number of other minor changes are proposed. These include:

- Reinstatement of the main entrance at the corner of Red Lion Street and Sandland Street and enlargement and refurbishment of reception area;
- Improved cycle parking and shower and locker facilities and provision of new direct route from rear courtyard through to ground floor core;
- New rear terraces at ground floor, 1st, 5th and 6th floor levels;
- Extending two existing lifts to new 6th floor;
- Creation of new lift service from basement to fifth floors;
- Reconfiguring the toilets so that these are accessed from office floor levels rather than half landings;
- Re-cladding ground floor road-facing facades and cleaning the entirety of, existing road-facing rendered facades;
- Replacing all remaining existing windows on the rear facade with new double glazed units; and
- Rendering remaining existing rear facade to match the front.

4.2 The Scheme includes works of demolition and construction. For ease of description these elements are set out separately in detail below.

Demolition

4.3 The Application involves the partial demolition of the rear elevation of the existing building to facilitate the construction of the proposed rear extension.

4.4 The current plant room, located at 5th floor roof level of the existing building, is to be relocated to the roof of the proposed 6th floor with the existing structures being demolished to allow for the construction of the new floor.

Extension

Roof Extension and Plant Enclosure

4.5 The Scheme involves the construction of a new office floor at 5th floor roof level of the existing building in place of the existing plant. The new floor would provide approximately 212 sqm of office floorspace and would contain a lift and stair core and toilet provision.

- 4.6 The existing plant would be relocated to the roof level of the proposed 6th floor and would be contained within an open plant enclosure. The plant enclosure would be accessed via a new set of stairs, constructed to provide continuous access throughout each floor of the building.
- 4.7 The enclosure has been designed in line with the 'Bauhaus' style of the existing building and would be set back from the building line of the proposed 6th floor to minimise any visual appearance from street level.
- 4.8 The final design of the roof extension and the plant enclosure have been formed following comments from LBC on the previous designs, proposed within the Pre-Application submission.
- 4.9 The enclosure would include louvered openings which have been designed to match the proportions of the existing building and allow efficient extraction and filtration of the plant.

Rear Extension

- 4.10 The key aspect of this Application is the proposed extension to the rear of the existing building, to provide additional floorspace at ground to fifth floors.
- 4.11 The additional floorspace created would be entirely office floorspace and would extend the floorplates of the existing building to provide an overall increase in the available floorspace of the building.
- 4.12 The proposed extension would provide an approximate additional floorspace of between 63 sqm and 90 sqm depending on the floor. External terraced areas are proposed to the side of the 5th floor level which would be accessed via doors in the rear extension and protected with metal balustrades.
- 4.13 The rear extension has been designed to have close regard to the proportions and design characteristics of the existing building. The inclusion of the terraces at 5th floor level provides a staggered design which minimises the visual and daylight and sunlight impact of the extension on neighbouring properties.
- 4.14 The extension is to be finished with high quality brickwork to fit harmoniously with the finish of neighbouring properties. The proposed bricks are a yellow-grey and fit harmoniously with the finish of neighbouring properties.

Floorspace Schedule

- 4.15 The existing and proposed floorspace figures are detailed in Table 3.1 below. The figures are also contained within the Design and Access Statement, produced by ORMS.

- 4.16 As shown in Table 3.1, the Scheme would increase the level of office floorspace on all floors.

Table 3.1 – Existing and Proposed Land Use

Level	GIA		GEA	
	Existing (sqm)	Proposed (sqm)	Existing (sqm)	Proposed (sqm)
Basement	517	524	542	563
Ground	530	614	582	662
First	551	660	601	699
Second	551	660	601	699
Third	551	660	601	699
Fourth	439	545	485	585
Fifth	416	519	485	557
Sixth	85	264	99	299
Plant	0	11	0	17
Total	3640	4455	3996	4777

Alterations to Existing Entrance and Façades

- 4.17 The Scheme seeks to reinstate the original entrance at the corner of Red Lion Street and Sandland Street, to improve the access and visibility of the building.
- 4.18 The existing entrance is located along Sandland Street, to the side of the building. The entrance was introduced through planning applications ref. PS9604263, granted on 6 February 1997 and ref. 2012/2483/P, granted 2 July 2012.
- 4.19 The entrance can be confusing both visually and practically to visitors, being comprised of a mix of architectural styles. Poor use is made of the prominent location at the crossroads of Red Lion Street and Sandland Street.
- 4.20 It is proposed that the existing entrance be redesigned to reinstate a distinctive entrance at the corner of both streets, providing each access directly from the street.
- 4.21 The design of the proposed entrance has been influenced by the Bauhaus characteristics of the existing building and available photographic material of the original entrance.
- 4.22 The entrance would comprise a glazed double door at the corner of the building which would be contained within a wrap constructed of metal panels, stone and glazing. The wrap would be equal in length in both directions from the corner entrance, providing an attractive, symmetrical finish.
- 4.23 The proposed changes to the existing entrance, coupled with proposed improvements to the layout of the ground floor, would provide an improved and enlarged reception area.

4.24 This Application also seeks to make minor alterations to the existing front and rear facades of the building to help modernise the building in tandem with the proposed extensions.

4.25 The front façade would be re-clad through the introduction of new stone cladding at ground floor level of the entirety of the Red Lion Street elevation and part of the Sandland Street elevation.

4.26 The remainder of the front façade, which has a white rendered finish, would be cleaned.

Internal Alterations

4.27 Minor alterations and reconfiguration to the existing floors are proposed within this Application.

4.28 The existing ground floor would be reconfigured to provide an improved reception area. The reception would now occupy a larger area, providing a more appropriate feel for an office building of this size, where the existing reception fails to do so.

4.29 The ground floor office floorspace along Sandland Street would be opened up and refurbished to allow for future subdivision based on tenant requirements.

4.30 A new lift shaft will be installed alongside the two existing shafts. The new lift shaft would run from the basement to fifth floor and would accommodate the increased person movements associated with the additional office floorspace.

4.31 Reconfiguration of the upper floors (1st – 5th storey) would provide largely open floorplates to achieve the maximum useable floorspace and would allow for later subdivision based on tenant requirements.

4.32 Replacement and improvement of the existing WC provision would be undertaken on all floors to meet guidelines.

Parking, Access and Storage

4.33 The Scheme would be accessed through the reconfigured entrance at the corner of Red Lion Street and Sandland Street. The entrance would provide primary access to all floors. Disabled access is provided at the main entrance.

4.34 The existing side fire exit, located along Red Lion Street, is to be retained and improved with the addition of a new step to provide safer navigation from the building to the street.

4.35 Two new access points are proposed to the rear of the property at ground floor level. The first of the new access points can be accessed directly from the ground floor

reception and from the rear without interruption. The second new access provides a connection between the northern office floorplate and the proposed ground floor office terrace. The office terrace is to be bounded by a metal balustrade and would be accessed from a separate gate.

- 4.36 The existing car park to the rear of the building is accessed from Sandland Street and accommodates a total of 5 parking spaces. The proposals would result in the loss of the existing spaces to make space available for cycle parking and storage areas. The Site is located in an area of excellent public transport accessibility and a 'car free' development is appropriate. Access and vehicle parking for the sub-station would be retained.
- 4.37 The Scheme would provide a total of 27 cycle spaces (11 new spaces for development plus 16 existing spaces) to be located at ground floor level, adjacent to the proposed office terrace. The spaces would be provided outdoors in a two-tier storage rack, with covered roof.
- 4.38 The existing building currently provides limited dedicated cycle storage. This provision would therefore improve the current facilities and further promote sustainable travel.
- 4.39 The Scheme provides waste and recycling facilities in line with the current requirements. Bins for both general waste and mixed recycling would be located in a defined storage area to the rear of the building, at ground floor level. These would be accessed via the rear access doors.

5.0 PLANNING POLICY FRAMEWORK

5.1 This application has been informed by adopted development plan policies and other relevant guidance. This section of the statement provides a summary of the planning context, and **Section 5** provides an assessment of the Application against the policies and guidance contained within this documents.

Statutory Framework

5.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise. However, section 14 of the National Planning Policy Framework (2012) states that where the Development Plan is absent, silent or relevant policies are out of date, presumption should be in favour of sustainable development and planning permission should be granted, unless material considerations indicate otherwise.

National Guidance

5.3 The National Planning Policy Framework (the "NPPF") was published on 27 March 2012 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements. The NPPF sets out the Government's approach to planning matters, and is a material consideration in the determination of planning applications

5.4 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through decision-taking (paragraph 14). This paragraph goes onto state that:

"For decision taking this means:

- *Approving development proposals that accord with the development plan without delay; and*
- *Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted."*

The Development Plan

5.5 The statutory development plan for the Site comprises:

- The London Plan (Further Alterations to the London Plan) ("FALP") (2016);

- LBC's Core Strategy (2010); and
- LBC's Development Policies (2010);

Emerging Policy

- 5.6 LBC is in the process of producing a new Local Plan for Camden. The Local Plan will, upon adoption, replace the Core Strategy (2010) and Development Policies (2010) documents.
- 5.7 LBC submitted the Local Plan and supporting documents to the Secretary of State for Communities and Local Government on 24 June 2016. Public hearings will be held in October 2016 as part of the Examination in Public (EIP).
- 5.8 Following the close of the EIP, LBC will review the feedback received and prepared a revised version of the plan for further inspection.

Regional Guidance

- 5.9 A number of supplementary planning documents have been published by the GLA that are relevant in the consideration of this Application. Those with particular relevance are:
- SPG: Central Activities Zone (March 2016);
 - SPG: Crossrail Funding (March 2016);
 - SPG: Character and Context (June 2014);
 - SPG: Sustainable Design and Construction (May 2006); and
 - SPG: Accessible London: Achieving an Inclusive Environment (April 2004).

Local Guidance

- 4.10 A number of supplementary planning guidance documents have been adopted by the LBC. These are also a material consideration in respect of the application. Those of particular relevance are:
- CPG 1 Design;
 - CPG 3 Sustainability;
 - CPG 4 Basements and Lightwells;
 - CPG 5 Town Centres, Retail and Employment;
 - CPG 6 Amenity;
 - CPG 7 Transport; and
 - CPG 8 Planning obligations.

Site Specific Designations

- 5.10 The Camden Core Strategy Policy Map outlines that the Site is within:

- Central London Area;
- London Suburbs Archaeological Priority Area;
- Greenwich Park Wolfe statue to Tower Bridge (5A.2) Designated Background View; and
- Bloomsbury Conservation Area.

5.11 The building is not statutorily or non-statutorily listed.

5.12 The Site is located within the Bloomsbury Conservation Area. The Site sits within the Queens Square / Red Lion Square sub-area.

5.13 The Site has a PTAL (Public Transport Accessibility Level) rating of 6b (Excellent).

6.0 PLANNING POLICY ASSESSEMENT

Introduction

- 6.1 This section assesses the component parts of the proposed development against the statutory development plan and other material considerations as outlined in **Section 5**.

Principle of Additional Office Floorspace

- 6.2 The Site is within the Central London Area (Core Strategy Policies CS3 and CS9) which is promoted as a focus for the future growth of the Borough's homes, offices, shops, hotels, as well as other uses.
- 6.3 The Scheme would result in the creation of an additional 815 sqm (GIA) of office floorspace. The Scheme would contribute to strategic objective CS8 (Promoting a Successful and Inclusive Camden Economy) of the adopted Core Strategy (2010) through the creation of additional office floor space to meet the forecast demand of 615,000 sqm to 2026 across the Borough.
- 6.4 The additional office floorspace will be delivered through extension of the existing building, within the demise of the existing site. This is in line with paragraph 17 of the NPPF which identifies a number of core planning principles, including that planning should:

“encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”

- 6.5 In tandem with the additional floorspace, the Scheme seeks the reconfiguration of each of the floors of the existing building to make the most efficient use of the space. This adheres to Policy 4.2 of the FALP which states that the renewal and modernisation of existing office stock is encouraged. Each floor would be open plan to allow later subdivision to accommodate tenants of various sizes, in line with Part C of Strategic Objective CS8.
- 6.6 The Scheme meets the considerations of Policy DP13 of the Development Policies Document which states that LBC will encourage the continued use of existing office premises for business use where employment floorspace is maintained or increased.

Flexibility for Small and Medium Sized Enterprises (“SMEs”)

- 6.7 The Local Plan (Policies CS8 and DP13) sets out an expectation that development includes a mix of employment types, including suitable space “for small and medium sized enterprises, such as managed, affordable workspace” (CS8).

- 6.8 The Development Policies document defines Small and Medium Enterprises (“SMEs”) as *“businesses employing less than 50 people (small) and / or less than 250 (medium)”*.
- 6.9 The Homes and Communities Agency ‘Employment Densities Guide: 2nd Edition’ sets out that the average employment density for ‘serviced offices’ and ‘general offices’ is one full time employee per 10sqm (NIA) and 12sqm (NIA) respectively. On this basis it is anticipated that the lettable (NIA) area of the proposed offices (3,487 sqm) would accommodate approximately 290 to 347 employees. This would equate to approximately 64 and 77 employees for the Scheme (776 NIA uplift).
- 6.10 Notwithstanding the fact that the total B1(a) floor area would be suitable for a ‘medium’ sized business in its entirety and a number of ‘small’ businesses’, the open floorplate approach of this application allows for a flexible approach to sub-division. The internal layouts have been designed to allow flexibility and can be divided on a lateral, floor-by-floor, basis or by simple internal divisions according to demand.

Residential Floorspace

- 6.11 Policy DP13 seeks that proposals involving the reuse of office buildings make inclusion for other priority uses such as housing, in line with Policy DP1. Policy DP1 requires 50% of all additional flooring to be provided as housing.
- 6.12 The Scheme provides 815 sqm (GIA) of additional floorspace. This would therefore equate to a requirement for 407 sqm to be provided as housing.
- 6.13 The proposals contained herein do not include the provision of any residential floorspace. The reasons for the decision not to include residential floorspace in the development are provided below:
- The existing stair and lift core is located in a central location within the building, opening out to the various sections of office floorspace. In order to provide residential units, a new dedicated core would be required to serve the units. High costs would be incurred in the construction of the core;
 - The introduction of a second core would reduce the energy efficiency of the building, consequently making the development contrary to Policy DP22 of the Development Policies document which requires development to incorporate sustainable design and construction methods;
 - The amount of residential floorspace which would be required through Policy DP1 would be approximately 400 sqm (being 50% of the overall uplift). Furthermore, due to the varying areas of the proposed floorplates the residential units would need to be provided on various floors. This figure would be insufficient to provide a high quality residential environment; and

- The existing lease, which still has over 130 years unexpired, precludes such uses as housing in the existing / enlarged building.

6.14 The decision to not provide residential floorspace was discussed with LBC in correspondence dated 12 August 2016. Within the correspondence it was proposed that instead a payment-in-lieu would be supported.

6.15 A copy of this correspondence is provided at **Appendix 2**.

Design Principles

6.16 High quality and inclusive design is encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development, and should contribute positively to making places better for people. Part 7 of the NPPF outlines the requirement for good design and sets out that development should:

- *“Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
- *Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
- *Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
- *Are visually attractive as a result of good architecture and appropriate landscaping.”*

6.17 Chapter 7 of the London Plan sets out the Mayor’s policies on a number of issues relating to London’s places and spaces. Policy 7.2 (An Inclusive Environment) requires all new development in London to achieve the highest standards of accessible and inclusive design, while Policy 7.4 (Local Character) states that “development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings”. Part D of Policy 7.6 (Architecture) states that buildings and structures should “not cause unacceptable harm to the amenity of surrounding land and buildings”

6.18 The GLA has also published Supplementary Guidance to the London Plan. SPG: Achieving an Inclusive Environment (October 2014) provides detailed advice and guidance on providing inclusive design in London.

6.19 At the local level, Camden's Development Policy DP24 requires all development to be of the highest standard of design and will expect developments to consider:

- a) "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*
- i) accessibility."*

6.20 Further planning policies that promote Camden as a safer place, and recognises the need to incorporate design principles which contribute to this, are contained within adopted and emerging development plan documents and guidance.

6.21 A comprehensive Design and Access Statement prepared by ORMS is submitted as part of the Application. This document sets out in detail an evaluation of the Scheme's design and the manner in which this has progressed as a result of the consultation undertaken.

Amenity

6.22 Locally, Core Strategy Policy CS5 states that LBC will protect the amenity of residents and those working and visiting in the borough by making sure the impact of development on occupiers and neighbours is fully considered. Mitigation measures are required where necessary. Policy CS9 also supports residential communities by protecting amenity.

6.23 Furthermore, detailed Policy DP26 protects the quality of life of occupiers and neighbours by only granting permission that does not cause harm to amenity. The factors which LBC will consider are:

- a) "visual privacy and overlooking;*
- b) overshadowing and outlook;*
- c) sunlight, daylight and artificial light levels;*
- d) noise and vibration levels;*
- e) odour, fumes and dust;*
- f) microclimate;*

g) the inclusion of appropriate attenuation measures.”

- 6.24 The above policy is reproduced in the Emerging Local Plan under Policy A1, further highlighting the necessity for development to protect residential amenity and manage the impact of development.
- 6.25 Further guidance on the application of the Council's amenity policies is contained within the relevant supplementary guidance documents, including CPG1 (Design) and CPG6 (Amenity).
- 6.26 In this way, we are of the view that no undue impact on residential amenity will result from the Scheme, in accordance with Policies CS5 and DP26. This is assessed in more detail through the individual technical assessments and summarised below.

Air Quality

- 6.27 London Plan Policy 7.14 provides regional planning policy on improving air quality and states that development proposals should promote sustainable design and construction to reduce emissions from the demolition and construction of buildings. Further guidance is provided in the Mayor's supplementary planning guidance.
- 6.28 Policy CS16 seeks to improve health and well-being in Camden and recognises the impact of poor air quality within the borough. It is noted that the whole borough has been declared an Air Quality Management Area (AQMA).
- 6.29 Detailed policy is provided within Policy DP32 and its supporting text, which expects mitigation measures within developments which are situated in areas of poor air quality.
- 6.30 An Air Quality Assessment has been prepared by XCO2 which forms part of this Application and considers the impacts of the Scheme during the construction stage. The impact of construction traffic is assessed, along with the potential construction dust impacts.
- 6.31 The report concludes that the risk to human health during demolition and construction is low. The Dust Soiling Risk to neighbouring properties was found to be medium, however it is concluded that this risk can be mitigated against through a Dust Management Plan.
- 6.32 The report concludes that air quality considerations should not pose a constraint to the Scheme.

Noise – Awaiting from Sandy Brown

- 6.33 Under Policy DP28, LBC will seek to ensure that noise and vibration from development is controlled and managed. LBC will seek to minimise the impact on

local amenity from the demolition and construction phases. This policy is replicated in the emerging Local Plan policy A4.

- 6.34 An Acoustic Survey was undertaken by Sandy Brown to determine the proposed plant's compliance with the relevant Camden requirements. The existing plant is located at 5th floor roof level and is proposed to be relocated to the new roof top enclosure at 6th floor roof level.
- 6.35 The plant would be used in conjunction with the office uses on all floors. The report assesses that the proposed plant, if implemented with proposed mitigation measures (i.e. the installation of louvres around proposed plant enclosure) would be within LBC's plant noise emission criteria.

Daylight / Sunlight

- 6.36 The Scheme would increase the bulk of the existing building, and therefore a Daylight and Sunlight Report has been prepared by Delva Patman Redler as part of this Application. This assesses the impact of the development on the neighbouring residential amenity of buildings adjacent to the Site.
- 6.37 The Report sets out details of tests undertaken in accordance with the BRE Report 209 "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (second edition, 2011).
- 6.38 The result of the daylight analysis shows that the Scheme would not adversely affect the levels received by neighbouring properties with the quality, quantity and distribution of light remaining fully BRE compliant.
- 6.39 Some minor infringements of the BRE guidelines were recorded in the neighbouring sunlight analysis. However, the report states that these would not be detrimental due to the small quantum of reductions recorded.
- 6.40 Overall, it is therefore considered that the Scheme is acceptable and would not adversely impact on the light levels or neighbouring amenity of adjacent occupiers.

Servicing and Transport

- 6.41 Section 4 of the NPPF sets out the Government's policies with regard to transport. Paragraph 32 sets out the requirement for all developments that generate significant amounts of movement to be supported by a Transport Statement. It is also stated (paragraph 34) that "plans and decisions should ensure developments that generate significant movements are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised".
- 6.42 Chapter 6 of the London Plan provides the regional guidance for transport. Policy 6.1 (Strategic Approach) seeks to encourage the "closer integration of transport and

development”, while supporting “development that generates high levels of trips at locations with high public transport accessibility and/or capacity”.

6.43 Policy 6.10 aims to bring about a significant increase in walking, by improving the quality of the pedestrian and street environment.

6.44 At the local level, Core Strategy Policy CS11 is the primary transport policy which promotes the availability of sustainable transport choices to support growth, reduce environmental impact of travel, and relieve pressure on the transport network.

6.45 To support Camden’s growth and promote walking, cycling and public transport, the Council will continue to improve facilities for cyclists including increasing the availability of cycle parking.

6.46 This is supported by Policy DP16 which seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. This is also promoted under Policy DP17, which resists development that is dependent on travel by private motor vehicles.

Car Parking

6.47 The NPPF requires local authorities to consider parking provision within new developments based upon the accessibility of the development and the opportunities for public transport, whilst recognising that there is a need to reduce the use of high emissions vehicles.

6.48 Policy 6.13 (Parking) of the London Plan aims to achieve an appropriate balance between promoting new development and preventing excessive car parking provision.

6.49 The Scheme would remove the 5 existing car parking spaces and do not re-provide any new spaces. The proposals therefore represent a ‘car-free’ development within a highly sustainable transport location (Public Transport Accessibility of 6b). Such developments are encouraged by LBC in Policy DP18 of the Development Policies Document.

Cycle Parking

6.50 Both the NPPF and the London Plan promote cycling in locations which can be made sustainable.

6.51 London Plan Policy 6.9 encourages new development to contribute to the increase of cycling through the provision of cycling parking facilities. The standards seek 1 long-stay space to be provided per 90sqm and 1 short-stay per 500sqm (for the first 5,000 sqm).

- 6.52 Developments that promote cycling is encouraged throughout the development plan. Policy DP18 states that developments will be expected to meet the Council's minimum space standards for cycle parking of 1 space per 250 sqm.
- 6.53 The Scheme would provide 11 on-site cycle parking spaces. This is an increase over the existing 16 spaces in the building, and would therefore provide a total of 27 cycle space. This is in line with the requirements of the London Plan standards, set out in Table 6.3 (Cycle Parking Minimum Standards) of the FALP, for the Scheme.
- 6.54 The proposed cycle parking spaces are to be located in the yard at ground floor level, to the rear of the Site. The spaces would be provided in a two-tier stack and contained under a roof.
- 6.55 Shower and changing facilities are proposed at basement level and accessed from the stair and lift core. The quantum of facilities has been provided in line with the number of cycle parking spaces provided.

Energy and Sustainability

- 6.56 The NPPF seeks to ensure the delivery of renewable or low carbon energy developments in order to address Climate Change and achieve environmental sustainability through improving biodiversity and minimising waste.
- 6.57 London Plan Policy 5.2 (Minimising Carbon Dioxide Emissions) states that development proposals should make the fullest contribution to minimising carbon dioxide emission in accordance with the 'be lean, be clean, be green' energy hierarchy. It seeks that new non-residential buildings between 2016-2019 will need to make an improvement over 2010 Building Regulations as per building regulations requirements.
- 6.58 At the local level, Core Strategy Policy CS13 requires all development to take measures to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation by:

"a) ensuring patterns of land use that minimise the need to travel by car and help support local energy networks;

b) promoting the efficient use of land and buildings;

c) minimising carbon emissions from the redevelopment, construction and occupation of buildings by implementing, in order, all of the elements of the following energy hierarchy:

1. ensuring developments use less energy,

2. *making use of energy from efficient sources, such as the King's Cross, Gower Street, Bloomsbury and proposed Euston Road decentralised energy networks;*
3. *generating renewable energy on-site; and*

d) ensuring buildings and spaces are designed to cope with, and minimise the effects of, climate change."

- 6.59 Under Policy DP22, LBC requires development to incorporate sustainable design and construction measures and must demonstrate how sustainable design principles and measures have been incorporated into the design and proposed implementation. Schemes must also incorporate green or brown roofs wherever suitable.
- 6.60 The above policy expects non-residential developments of 500 sqm or more to achieve "excellent" in BREEAM assessments.
- 6.61 A Sustainability and Energy Statement has been prepared by GDM and forms part of this Application. The report shows that annual carbon dioxide emissions are reduced by 29.9% when taking into account energy demand reduction (20.6%) and savings from Air Source Heat Pumps ("ASHPs") (9.3%). This would be achieved through improved fabric insulation in the construction of the extension and the use of air source heat pumps.
- 6.62 Overall, it is considered that the Scheme accords with the relevant planning policy and guidance with regard to energy and sustainability at all tiers, especially London Plan Policies 5.2 and 5.7.

Archaeology

- 6.63 The Site is in the London Suburbs identified Archaeological Priority Area and a desktop archaeological report, compiled by Pre-Construct is submitted as part of this Application.
- 6.64 The report found that the Site has low to moderate likelihood of remains for all historical periods, aside from the post-medieval period where the likelihood is high. Due to significant bomb damage during the Second World War the report states that the potential for modern heritage assets is negligible.
- 6.65 The report concludes that the works involved in the Scheme would incur very limited potential impacts.

7.0 HERITAGE AND TOWNSCAPE ASSESSMENT

7.1 This section of the Statement firstly considers the significance of the existing building and the wider setting, in accordance with the requirements of paragraph 128 of the NPPF and then goes on to consider the wider townscape setting. The section concludes with an assessment of the proposals against the relevant planning policy.

7.2 As noted in **Section 4** of the Statement, the scheme has been developed taking into account the comments provided within the Pre-Application response from LBC's Conservation and Design Officers.

Assessment of Significance

7.3 The Site is located within the Queens Square / Red Lion Square sub-area of the Bloomsbury Conservation Area and therefore the impact upon the heritage assets needs to be considered.

7.4 The building on the Site is not statutorily listed or locally listed, though there are listed buildings within the surrounding area.

7.5 The Bloomsbury Conservation Area Appraisal and Management Strategy (adopted April 2011) does not make specific reference to the building, however states that there are two 'unremarkable' office blocks along Red Lion Street, which are "*larger in sale and massing the other buildings on the street*". Although it is not clear if this comment is made in reference to the Site, it is assumed that it is.

7.6 The building is not identified in the Appraisal and Management Strategy as making a positive or negative impact on the Conservation Area.

Bloomsbury Conservation Area

7.7 Paragraph 131 of the NPPF identifies the desirability of sustaining and enhancing the significance of heritage assets, including Conservation Areas, and putting them to viable uses consistent with their conservation.

7.8 The NPPF recognises, however, that not all elements of a conservation area may contribute towards its significance.

7.9 The Bloomsbury Conservation Area was originally designated in 1968 to conserve and protect Georgian properties and structures from earlier eras from new development. Subsequent extensions to the conservation area have been made to reflect a growing appreciation of Victorian and Edwardian architecture, as well as high quality 20th century developments.

7.10 The Appraisal and Management Strategy remarks that Bloomsbury is considered to be a significant example of town planning, with organised street layouts and formal

landscaped squares. The area was originally predominantly residential, however over time has altered to include a variety of uses due to its central location.

- 7.11 The Queen Square / Red Lion Square Sub Area is split into two separate areas by Theobalds Road, which contains a number of 20th century interventions.
- 7.12 The Site is located in the southern half of the Sub Area, in close proximity to Red Lion Square. Red Lion Square was constructed in 1684 and contained seven narrow passageways leading off from the corners. One of these passageways was Red Lion Passage which ran through the Site but was removed in the 1950's.

Analysis of Townscape

- 7.13 The townscape and visual impact of the proposed development will be limited to the immediate area by virtue of the scale and massing of the Scheme and the relative scale of surrounding development and orientation of the streets.
- 7.14 Red Lion Street itself is a long linear street running north to south from Theobalds Road to High Holborn. The street is parallel to the neighbouring Bedford Row and Jockey's Fields and perpendicular to Sandland Street and Princeton Street; forming a small grid-like pattern.
- 7.15 The street is relatively narrow, fluctuating between a standard width at the southern end to a reduced width further to the north. Views are limited in some sections of the street, therefore drawing the eye away from the upper parts of the buildings.
- 7.16 For the purposes of this assessment, the character areas are referred to as:
- Red Lion Street, Sandland Street and Nearby Streets; and
 - Three Cups Yard.

Red Lion Street, Sandland Street and Nearby Streets

- 7.17 The Site is located in the Queen Square / Red Lion Square Sub Area (No. 11) of the Conservation Area. The townscape in close proximity to the Site comprises a mix of building styles and ages.
- 7.18 The character of this area is largely reflective of the wider Bloomsbury Conservation Area in that it is formed of a mix of interlinked grid-like streets and landscaped squares. The Queen Square / Red Lion Square Sub Area does, however, differ in that there are is a mixture of building styles.
- 7.19 Red Lion Street, which forms one of two principal elevations of the existing building, is a linear street comprising buildings of varying architectural styles. Aside from the Site itself, buildings on Red Lion Street directly front onto the street and are accessed direct from the pavement.

- 7.20 The section of the street which adjoins the Site is a dual-vehicle carriageway flanked by footpaths. However this narrows to a single-vehicle carriageway to the north of the Site. A loading area occupies the entirety of the Site's frontage along Red Lion Street.
- 7.21 Buildings within the area range in height from three to ten storeys, with some buildings containing additional roof levels set back from the parapet. This variance in building heights is described as "jarring" on page 86 of the Bloomsbury Conservation Area Appraisal and Management Strategy.
- 7.22 Materials are varied in their use and quality within the area. There is a variety of brick finishes within the older buildings from the 17th and 18th centuries, alongside a mix of metal and glazed finishes in more recent developments. Render and stone is also evident in some places, including the existing building on the Site.
- 7.23 At ground floor level the quality of the shopfronts and entrances vary considerably, with those contained within nos. 56 – 60 Red Lion Street, located opposite the Site, being notably poor quality, whilst no. 22 Sandland Street is of a higher quality.
- 7.24 In general, the quality of the townscape in the area is low with no distinct uniformity to the buildings and limit buildings of townscape merit; only 18, 20 and 22 Red Lion Street being identified as 'Positive Buildings' in the Sub Area.

Three Cups Yard

- 7.25 Three Cups Yard, located immediately to the north of the rear yard area of the Site, is a residential development accessed from Sandland Street. Due to its close proximity to the Site, an assessment of the townscape of the Yard has been undertaken.
- 7.26 The Yard is comprised of a row of four terraced properties, a small block of flats containing three units and a car park. Both the terraced housing and the block of flats are constructed from a light yellow-brown brick which closely reflect the character of the Old School building, a converted former school, located on Princeton Road on the north side of the Yard.
- 7.27 The Yard is typical of a yard or mews development in that it is surrounded on all sides by relatively tall buildings which provide a strong sense of enclosure and help to build a distinct character.
- 7.28 Buildings enclosing the Yard are varied in their character, ranging from the academic character of the Old School building to the Bauhaus architectural style of the building on the Site. No single, consistent architectural style exists surrounding the Yard.
- 7.29 Whilst the Yard is distinctive in its character when compared to the remainder of the Sub Area and the wider Bloomsbury Conservation Area, its distinctiveness does not

necessarily equate to a positive element of the area and in fact is not representative of the building type which would have been found along Red Lion Passage.

- 7.30 Unlike Red Lion Street, the Yard does not have clear passing trade and is only assessed by the residents of the residential units via a private gate and so forms a calm environment and character which is not experienced by most outside users.
- 7.31 Views from the Yard are limited with only those south along the access route to Sandland Street and partial views to the east to the small open car park area in front of nos. 37-41 Bedford Row.
- 7.32 The quality of the townscape is medium.

Assessment of the Application Proposals Against the Relevant Planning Policy

Principle of Rear Extension

- 7.33 The proposals for the rear extension have been considered in conjunction with the assessment of the townscape surrounding the Site. As outlined above, the townscape in close proximity to the Site is mixed and generally of medium to low quality.
- 7.34 The design of the rear extension has been based on the most logical approach to providing the additional office floorspace on Site. The proposed extension would follow the L-shaped footprint of the existing building, however would be set back from the edges.
- 7.35 The proposed approach was considered to be acceptable in design terms in the Pre-Application Letter from LBC. Whilst the overall design has been retained since the pre-application stage, some minor changes have been made to improve the overall quality and appearance of the extension.
- 7.36 The Scheme would cause no harm to the character and appearance of the existing building and the setting of the Bloomsbury Conservation Area. This has been achieved by responding positively to the comments received at pre-application and the site's built context. The simplicity of design and use of quality materials combines with the secluded location to create an appropriate extension to the existing building.
- 7.37 We submit, therefore, that the Scheme would accord with Policy CS14 of the Core Strategy and Policy DP25 of the Development Policies document which seek to preserve and enhance the character and appearance of conservation areas within the borough.
- 7.38 A comprehensive assessment of the quality of the design of the proposals is set out in the Design and Access Statement, prepared by ORMS, along with a full explanation of the rationale for the details of the proposals.

Principle of Roof Extension and Plant Enclosure

- 7.39 Taking into account the existing streetscape, particularly the adjacent MidCity Place building, a roof extension to the existing building is appropriate, given the context of the Site, at the apex of Red Lion Street and Sandland Street.
- 7.40 The proposed roof terrace is set back from the existing building line and coupled with the progression of the design since the pre-application stage, results in a minimal visual impact.
- 7.41 The Design and Access Statement, submitted as part of this Application, contains images of long and short views of the Site with the proposed roof extension and plant enclosure. The images demonstrate that the setting back of the proposed works produces an attractive development which is largely unseen from street level.
- 7.42 Both the proposed roof extension and the plant enclosure have been designed in line with the characteristics of the existing building.

8.0 PLANNING OBLIGATIONS AND CIL

Community Infrastructure Levy

- 8.1 The Community Infrastructure Levy (CIL) is payable on any new floor space where there is an uplift in floor area involved with the creation of office floorspace. Additionally, the Levy is chargeable where the existing floor area has not been in lawful use for more than six months out of the preceding twelve months.
- 8.2 Within this assessment, consideration is given to the Mayoral CIL requirements which came into effect on 1 April 2012. The rate for LBC is set at £50 per sqm (GIA).
- 8.3 In addition to the above, LBC adopted its Community Infrastructure Charging Schedule in March 2015 which was applied from 1 April 2015. This outlines a rate of £45 per sqm rate (GIA) for office developments (Class B1) in Zone A ('Central') area of the Borough.
- 8.4 A CIL Form has been submitted which outlines the relevant information for the Scheme.
- 8.5 The applicant would, in accordance with paragraph 204 of the NPPF, agree to enter into other planning obligations under S.106 where they are necessary to make the development acceptable in planning terms, related to the development, and fairly and reasonably related in scale and kind to the development.

9.0 SUMMARY AND CONCLUSIONS

- 9.1 The Scheme would result in the supply of high quality additional office space through the extension of the building. The additional space would be provided in a flexible manner in order to meet tenant requirements.
- 9.2 This Statement has provided an assessment of the proposals against the Statutory Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 9.3 The Scheme is considered to accord with the relevant policies of the adopted development plan, as well as being consistent with national planning policy.
- 9.4 The Scheme has been developed in the context of pre-application consultation with officers at LBC. This advice supported the principle of a rear extension of this form, and the principle of the provision of office floorspace. The proposed roof extension has been revised from the pre-application submission to accord to Policy DP24 and DP25.
- 9.5 Both extensions are well designed and articulated and would visually complement the existing building and the setting of the Bloomsbury Conservation Area.
- 9.6 The delivery of new office floorspace is a strategic objective within the LBC Local Plan and weighs in favour of the planning proposals.
- 9.7 The additional built form would not result in an unacceptable impact upon the amenities of neighbours; no harmful overlooking or unacceptable loss of daylight & sunlight would result.
- 9.8 In Conclusion, the Scheme is considered to be in accordance with relevant national and regional planning policy and guidance, the London Plan and LBC's Statutory Planning Framework.

Appendix 1 - LBC Planning Pre-Application Advice Letter, dated 21 June 2016

Date: 21/6/2016

Our ref: 2016/2226/PRE

Contact: Raymond Yeung

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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 18th 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 5th 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.

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

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

An advice note is attached and details of this are also available online here: 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.

**Appendix 2 - Correspondence from LBC confirming permitted non-compliance
with Policy DP1 of the Development Policies Document.**

Adam Price

To: Peter Bovill
Subject: RE: PD10618: Red Lion Street - 2016/2226/PRE - Pre-Application letter - On Site Residential Requirement?

From: Dunn-Lwin, Simon [<mailto:Simon.Dunn-Lwin@camden.gov.uk>]

Sent: 12 August 2016 09:55

To: Peter Bovill <Peter.Bovill@montagu-evans.co.uk>

Cc: Beaumont, Elizabeth <Elizabeth.Beaumont@Camden.gov.uk>; Yeung, Raymond <Raymond.Yeung@camden.gov.uk>

Subject: RE: PD10618: Red Lion Street - 2016/2226/PRE - Pre-Application letter - On Site Residential Requirement?

Peter,

I have received the advice from the legal department and they say that it is not impossible to vary the lease to accommodate residential use, given that you are already proposing to carry out substantial works which would require LL consent. They are sceptical of relying on the 'stringency of lease conditions' argument to circumvent DP1 and setting a precedent, and I am also disinclined to pursue this line of argument/justification, because leases are not set in stone.

DP1 provides for a cascade argument and I am inclined to accept that it would be impractical to provide good quality residential accommodation within the scheme – which would be private residential accommodation, given the relevant 50% foorspace figure for the purposes of DP1 would be below the affordable housing threshold. If it is the case that your client cannot meet the off-site provision, and you will need to provide justification and relevant evidence on this, my conclusion – subject to further details – is to support an in-lieu payment.

Alternatively your client could consider a modest extension/refurbishment below the DP1 threshold.

I hope the above, clarifies our position.

Regards,
Simon

Simon Dunn-Lwin MRTPI
Planning Solutions Team Manager
Regeneration and Planning
Supporting Communities
London Borough of Camden

Telephone: 020 7974 8094
Web: camden.gov.uk

2nd
5 Pancras Square
London N1C 4AG



Please consider the environment before printing this email.

From: Peter Bovill
Sent: 28 July 2016 13:34
To: Simon Dunn-Lwin (simon.dunn-lwin@camden.gov.uk) <simon.dunn-lwin@camden.gov.uk>
Cc: 'elizabeth.beaumont@camden.gov.uk' <elizabeth.beaumont@camden.gov.uk>; 'Yeung, Raymond' <Raymond.Yeung@camden.gov.uk>
Subject: PD10618: Red Lion Street - 2016/2226/PRE - Pre-Application letter - On Site Residential Requirement?
[Filed 28 Jul 2016 13:34]

It was useful to discuss the above site with you by phone at 1640 on 22 July.

I explained that my client is looking to bring forward a scheme that would add 829 sqm (GEA) office floorspace to an existing office building.

Pursuant to this, on 18 April 2016 we sought pre-application advice from LB Camden. On 17 May we undertook a site visit to the building with LB Camden officers and on 21 June 2016 we contained a pre-application advice letter which stated that:

“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.”

During our phone discussion last week, I explained some of the practical considerations which means that our client cannot accommodate 415 sqm of this increased floorspace as residential accommodation, on site.

My client does not own any other sites in the vicinity of the site and has no plans to buy any such site on which to accommodate new residential accommodation.

On 15 July 2016, I had sent a document to Stuart Minty at LB Camden (ORMS document dated 13 July 2016) which sought to set out some of the practical problems with the layout of the building and why adding 415 sqm of residential accommodation was impractical.

I re-attach a copy of this document & would ask you to consider this.

My client is looking for clear advice from LB Camden, following the discussions that have already taken place. I appreciate that this advice does not bind members into agreeing with officers.

However, my client is reluctant to ‘push the button’ to commission a design team to draw up plans for this 829 sqm extension if LBC officers are adamant that residential accommodation has to be provided on site, as per your 21 June 2016 letter.

You therefore asked me to go through the tests set out in Camden Development Policies 2010 Policy DP1 – Mixed use development (copy attached), to attempt to justify to officers, why an exception to this requirement could be made in this case.

I therefore set out below my consideration of our proposals against the 9 criteria of DP1 below:

“In considering whether a mix of uses should be sought, whether it can practically be achieved on the site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing and other secondary uses, the Council will take into account:

“a) the character of the development, the site and the area”

The existing development is exclusively commercial.

The surrounding area is mixed – with surrounding uses as follows:

- North – immediately adjacent is a residential block, with a further residential block to the north east
- West – on the opposite side of Red Lion Street are residential uses above ground floor retail uses

- South – on the opposite Sandland Street is the 13-storey office building, Mid City Place
- East – pub immediately next door with office, residential uses further along Sandland Street

So this is a genuinely mixed use area, if most buildings have single uses.

“b) site size, the extent of the additional floorspace, and constraints on including a mix of uses”

Existing GEA is 3,973 sqm, with proposed increase of 21% (829 sqm).

To provide half of this area (415 sqm) as residential, would require the introduction of a new core into the building, reducing the efficiency of an otherwise efficient office building.

The volume of floorspace per floor being added on to the rear of the building (G, 1, 2, 3, 4, 5 Floors) ranges in size from 73 to 100 sqm. Trying to then dedicate 37 sqm to 50 sqm of this increase to residential would be totally impractical, as the attached pdf document should demonstrate.

A further major constraint on any residential use, is the 150 year lease, which has still has over 130 years unexpired and which precludes such use in the existing / enlarged building (see attached).

“c) the need for an active street frontage and natural surveillance”

The addition of between 50 & 100 new employees, working in this enlarged building would bring increased footfall and natural surveillance to the area. The proposals are to restore the pedestrian entrance to the very corner of Red Lion Street & Sandland Street. At present, the building’s entrance is somewhat tucked away on Sandland Street. This more prominent entrance, increased ground floor entrance glazing & increased footfall will all improve active street frontage and natural surveillance.

Whilst retail (A1 / A2) uses might increase natural surveillance, such uses are excluded by the Head Lease of the property, which has a further 131 years to run (expires 2147) (copy of lease attached).

“d) the economics and financial viability of the development including any particular costs associated with it”

Our work on this project has focussed on the viability of producing an excellent office development. We have not examined the financial viability of whether 415 sqm of residential development would make more money on this than 415 sqm of office accommodation. The legal constraints on the lease have meant that the client has not sought to investigate this matter.

“e) whether the sole or primary use proposed is housing”

The sole use (as set out in the lease) is not as housing, but office accommodation.

“f) whether an extension to the gross floorspace is needed for an existing user”

The client is seeking to maximise the volume of office accommodation on this site, acknowledging the constraints of having residential uses nearby and the need to respect amenity (including daylight & sunlight) conditions of these neighbours.

The existing building has occupiers who are predominantly involved in legal services. Given the proximity of the site to the Inns of Court, this is not unusual for this area. It is highly likely that any additional accommodation would also be taken by such users, who have a particular reason to locate in this part of London.

The head lessee bought this building as an office investment and is precluded by the lease (until 2147) from using this building than for offices.

“g) whether secondary uses would be incompatible with the character of the primary use”

The principle of residential in close proximity to commercial office use is not disputed, but the quality of the residential accommodation that could be created is called into question, by the configuration of the existing building.

“h) whether the development is publicly funded”

N/A – Head Lease is to the Bedford Charity (Charity No. 204817)

“i) any other planning objectives considered to be a priority for the site”

We note that there is provision for payment-in-lieu under exception circumstances, where provision cannot practically be made on site and the applicant demonstrates that no alternative site is available in the area. The calculation of this payment is as follows:

829 sqm (GEA) x 50% (target on-site housing) x £700 payment level = £290,150

Conclusion

As discussed by phone, what our client, particularly in these uncertain economic times, is looking for is a degree of certainty. If LB Camden officers are adamant that this site is appropriate for on-site residential accommodation (in conflict with the 150 year lease), our client will merely seek to refurbish the interior of this existing building, with no further reference to LB Camden planners. We would consider this to be a missed opportunity to provide office accommodation, most likely used by the legal profession, at a location where such accommodation is in demand.

If, having read the above & attached, officers would, in principle, support the provision of an in-lieu payment of £290,150, our client would be willing to commission a design team to start work, pursuant to the submission of a planning application.

In light of the above, I would be grateful for an update from officers, further to the 21 June letter, to confirm if a wholly B1 uplift in floorspace would be acceptable on this site.

I look forward to hearing from you by email or letter.

Kind regards

Peter

Peter Bovill MRTPI MRICS

Partner

Montagu Evans LLP

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Secretary (Louise): 020 7312 7486 (Louise.Jones@montagu-evans.co.uk)

Email: peter.bovill@montagu-evans.co.uk

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