

60-70 Shorts Gardens and 14-16 Betterton Street

Planning Statement

Shorts Gardens LLP

April 2017

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1.0

Introduction

Background

1.1

This Planning Statement has been prepared on behalf of Shorts Gardens LLP to accompany an application for full planning permission for the extension, alteration and change of use of properties at the site of 60-70 Short Gardens and 14-16 Betterton Street in Covent Garden, within the London Borough of Camden, to develop an office-led mixed use development. The proposed development comprises the following:

“The refurbishment, extension and alteration of 60-70 Short Gardens and 14-16 Betterton Street to provide a two storey roof extension to both properties and a mix of B1/A1/A3/D1/D2/C3 uses. The development proposes the refurbishment of the basement and the installation of mezzanine floors associated to the basement and ground floor units of Shorts Garden. These floors will provide a mix of A3/D1/D2 uses and B1/D1/D2 respectively, with all upper floors on Shorts Gardens for B1 use. A change of use to Betterton Street to provide a mix of C3 to upper floors and A1/D1/D2 uses on ground floor with the introduction of a mezzanine to this unit. Dedicated cycle storage for residential and office uses will be located on ground floor and basement of Betterton Street and provision of refuse and recycling storage areas are located on ground floors of both buildings. Ancillary and plant spaces are allocated within basement areas of Shorts Gardens and Betterton Street, with a UKPN substation on the ground floor and a discrete plant enclosure on the roof of Shorts Gardens.”

1.2

A two storey curved roof extension is proposed to Shorts Gardens to provide additional office floorspace, while the two storey roof extension to Betterton Street will be for residential use. A total of four new residential units will be created in the Betterton Street property (three 2-bed units and one 3-bed unit). The application seeks planning permission for a range of uses for the basement, ground floor and mezzanine floors of Shorts Gardens (A3, D1 and D2) and the ground floor of Betterton Street (A1/D1) as currently a range of uses are being considered and the end use will depend on an appropriate tenant being found. These uses include a destination restaurant or gallery for the basement, basement mezzanine, ground and ground mezzanine floors of Shorts Gardens and a café or gallery use at the ground floor of Betterton Street. Storage, plant and ancillary uses will be located in the basement of Betterton Street. A substation is proposed at ground floor level of Shorts Gardens. Plant will also be located on the roof of Shorts Gardens, within an enclosure set back from the street so as not to be visible from street level.

1.3

The proposed development will provide a high quality office led development, whilst retaining and enhancing the historic fabric of the properties and has been designed to take account of and enhance the host properties and the surrounding conservation area.

1.4

The application site comprises two abutting properties with the overall site comprising an ‘L’ shaped plot with parallel frontages onto both Betterton Street and Shorts Gardens and a combined area of approximately 0.08 hectares. The site is located between Endell Street to the west and Drury Lane to the east within a mixed use area of Covent Garden. The properties are currently used for commercial uses including B1 in Shorts Gardens and B1 and a yoga studio in Betterton Street. Both properties are currently underutilised, and the Shorts Garden property includes a large vacant basement.

1.5

Neither of the application properties is listed but the site is located within the Seven Dials Conservation Area. The Conservation Area Statement (adopted 1998) classifies the site as making a positive contribution to the Conservation Area. The application site also lies within the

Central Activities Zone, an Archaeological Priority area and within the Crossrail contribution area.

- 1.6 The proposed scheme has been subject to a series of meetings with LB Camden through a PPA, a Design Review Panel, two consultation events and consultation with local groups including the Covent Garden Community Association.

Scope of the Application

- 1.7 The planning application is accompanied by the following documents:

- 1 Planning Statement (this document);
- 2 Design and Access Statement;
- 3 Heritage Impact Assessment;
- 4 Air Quality Assessment;
- 5 Daylight and Sunlight Assessment;
- 6 Noise and Vibration Assessment;
- 7 Energy and Sustainability Statement;
- 8 Basement Impact Assessment;
- 9 Transport Assessment;
- 10 Draft Framework Travel Plan;
- 11 Delivery and Servicing Management Plan;
- 12 Waste Management Strategy;
- 13 Draft Venue Management Plan;
- 14 Draft Construction Management Plan; and
- 15 Statement of Community Involvement.

Structure of Report

- 1.8 This Planning Statement comprises the following sections:

- Section 2 provides a description of the application site and surrounding area;
- Section 3 summarises the site's planning history;
- Section 4 provides details of the pre-application consultation;
- Section 5 summarises the relevant planning policy guidance;
- Section 6 describes the proposed development;
- Section 7 provides a summary of the technical assessments which have been submitted in support of the planning application;
- Section 8 contains an assessment of the proposed development; and
- Section 9 provides a summary and conclusions.

2.0 Site and Surrounding Area

The Application Site

- 2.1 The application site comprises 60-70 Shorts Gardens and 14-16 Betterton Street, within the Covent Garden area of Camden. The site is located on a rectangular block with frontages to both Shorts Garden and Betterton Street. To the east, the block is bounded by Drury Lane and to the west, by Endell Street.
- 2.2 No. 60-70 Shorts Gardens is a three storey property with a large basement, which dates from between 1910 and 1952 (see Heritage Impact Assessment). The property is of red brick with a steel and concrete frame and flat bitumen roof and mansard to the rear. The ground floor is of double height and incorporates brick arches, most of which are currently bricked up, with crittall windows above. A series of brick pilasters in between the arches give the building a defined vertical rhythm along its length. The façade of the building is set back by approximately 1.2 metres from the adjoining sections of the site. The property was previously used as a London Electricity Board operational building, but has been in use since the 1980s for B1 and studio use. Many of the internal spaces have been altered and modernised and there is little of architectural or historic interest internally remaining. The basement of Shorts Gardens is of double height (7.5 metres) and is 38 metres long by 11 metres wide. The basement has not been used for approximately 10 years. There is a courtyard to the rear of the property but this is owned by UKPN and does not form part of the application site.
- 2.3 The western element of the property comprises the four storey brick “Vent Building”, which vented the building when it was in use as a substation. Whilst this building dates from the 18th or early 19th Century it has been much altered and is in poor physical condition (see Appendix 1).
- 2.4 No. 14-16 Betterton Street is a four storey warehouse of brick and concrete construction with steel crittall type windows, which dates from around 1927. It has a flat roof and a protruding chimney breast to the west façade. The ground floor features a large double height opening. The interior of the property has been altered and modernised and there is little of architectural or historic interest internally.
- 2.5 Both properties are currently occupied by a range of office and studio uses with short terms leases that have the option to break in September 2018. The existing gross external area of the Shorts Garden property is 2544 sqm and that of the Betterton Street property 1143 sqm.

The Surrounding Area

- 2.6 The application site is located within a mixed use area of Covent Garden, surrounded by a variety of existing commercial and residential uses. To the north east, on the opposite side of Shorts Gardens, there is a hotel while to the north-west is an existing residential block (Dudley Court). To the south there are a variety of uses including retail, commercial and bar/restaurants. Along Drury Lane there is a mix of commercial, restaurant, bar, entertainment and retail uses including the New London Theatre.
- 2.7 Shorts Gardens contains a mix of building types, including 1970s developments (the hotel and residential block) and Georgian and Victorian buildings. Betterton Street contains Georgian town houses and contemporary brick buildings, along with the 1950s electrical substation (UKPN) adjoining the site. Details of the historic development of the area are contained in Section 3 of the Heritage Impact Assessment.
- 2.8 The application site is located within the North London sub-region and the Central Activities Zone (CAZ) as defined by the London Plan (2016). It is identified within the Central London

Area (CLA) within the Camden Core Strategy (2010). The site is also located within the Seven Dials Conservation Area and the London Suburbs Archaeological Priority Area, as identified within the Camden Core Strategy. The Conservation Area Appraisal notes that:

“Shorts Gardens has predominantly 19th century commercial buildings. The original buildings on the south side were demolished for the Brewery stables in the 1880s and the north side has mostly warehouses, four and five storeys high. The triangle bounded by Short’s Gardens, Earlham Street and Neal Street was converted in 1992 to a shopping development known as Thomas Neal’s. Entrances to the shops are mostly located internally to maintain the appearance of the original warehouse ground floor windows. The whole block is listed Grade II.”

2.9 Specifically in relation to the application site the Conservation Area Appraisal states:

“Shorts Gardens/Betterton Street - The block between Betterton Street and Shorts Gardens is occupied by a former LEB sub-station. The Betterton Street brick facade has ventilation holes with glass brick surrounds. The site is an opportunity site.”

2.10 The application site does not contain any statutorily listed buildings. However there are listed buildings within the vicinity of the site, including 24 and 33 Betterton Street, 22 Endell Street, the Cross Keys Public House in Endell Street and 51 and 53 Shelton Street. Further details are set out in Section 4 of the Heritage Impact Assessment.

Transport and Accessibility

2.11 The application site has a PTAL of 6b and excellent public transport accessibility, with four underground stations within 600 metres of the site (Covent Garden, Leicester Square, Holborn and Tottenham Court Road) and good bus services in the vicinity (the closest bus stops are on High Holborn). The site is within a controlled parking zone and both Shorts Gardens and Betterton Street are relatively narrow one-way streets, with double yellow line parking restrictions, although loading is permitted for a maximum stay of 40 minutes. In close proximity to the application site there are nine on-street parking bays and a doctor’s bay on Shorts Gardens; and a pay and display on Drury Lane. In addition, there are car parks on Drury Lane (332 spaces) and Parker Street (230). Parking Surveys undertaken by Waterman in March 2017 confirmed that there was parking capacity in the vicinity of the site. The footway along Shorts Gardens varies in width from 1.2 to 3 metres and is approximately 2.5 metres in front of the application site. Further details are set out in the Transport Statement.

3.0

Planning History

3.1

Planning permission was granted on appeal (10 June 2009) for '*alterations and extensions (including roof extensions) and refurbishment of existing commercial/office use (Class B1), change of use of ground floor of Shorts Gardens to create small units (Class A1/A2 and D1), and change of use of basement to either B1/D1 or D2 use (2012/1533/P)*'. Planning permission was subsequently granted (25 February 2013) to extend the time limit for implementation until 24 February 2016. The permission was implemented in February 2016.

3.2

The Table 3.1 summarises the key planning history relating to the application site.

Table 3.1 Key Planning History

Application Ref.	Description	Status	Comments
8701046	Change of use from electricity sub-station/depot to design studio as shown on drawing number SK1	Granted 06/08/1987	
PSX0304151/P	Partial retention of works to elevations including the replacement of roller shutters with glazing and creation of new entrance to offices and the replacement of the existing external lighting with new architectural lighting to both Shorts Gardens and Drury Lane elevations.	Granted 23/06/2004	
2008/1401/P	Alterations, extension (including roof extensions) and refurbishment of existing commercial/office use (Class B1), change of use of ground floor of Shorts Gardens to create small units (Class A1/A2 and D1), and change of use of basement to either B1/D1 or D2 use.	Granted at appeal	Appeal lodged 13/11/2008 and allowed 10/06/2009 (APP/X5210/A/08/2089789) Condition 2 restricts the use of the basement area to: 'Class B1 or Class D1, or as a swimming bath, skating rink, gymnasium or area for other indoor sports of recreations, not involving motorised vehicles or fire arm, and not for any other purposes within class D1 (assembly and leisure)'
2008/5895/P	Alterations, extension (including roof extensions) and refurbishment of existing commercial/office use (Class B1), change of use of ground floor of Shorts Gardens to create small units (Class A1/A2 and D2), and change of use of basement to either B1/D1 or D2 use. Change of use of basement to either Class B1/D1 or D2 use.	Withdrawn (date unknown)	
2012/2059/P	Amendment to planning permission 2008/1401/P allowed on appeal (APP/X5210/A/08/2089789) on 10/06/2009 (for alterations and extensions (including roof extensions)	Granted 23/05/2012	Condition 2 restricts the use of the basement area to: 'Class B1 or Class D1, or as a swimming bath, skating rink, gymnasium or area for other indoor sports of recreations, not involving motorised vehicles or

	and refurbishment of existing commercial/office use (Class B1), change of use of ground floor of Shorts Gardens to create small units (Class A1/A2 and D1), and change of use of basement to either B1/D1 or D2 use) to add a condition to ensure development shall be carried out in accordance with the approved plans.		fire arm, and not for any other purposes within class D2 (assembly and leisure)'
2012/1533/P	Application to replace / extend the time limits for implementation of, planning permission ref: 2008/1401/P, granted on appeal 10/06/2009 for 'alterations and extensions (including roof extensions) and refurbishment of existing commercial/office use (Class B1), change of use of ground floor of Shorts Gardens to create small units (Class A1/A2 and D1), and change of use of basement to either B1/D1 or D2 use.'	Granted 25/02/2013 Implemented	Condition 1 requires development to have begun within three years of the decision date (24/02/2016). The conditions are currently being discharged from this decision. Condition 8 (2015/6009/P) – Pending Determination Condition 11 and 14 (2015/4851/P) – Granted 12/11/2015 Condition 7 (2015/4850/P) – Granted 13/01/2016 Condition 3 (2015/4849/P) – Granted 11/11/2015 Condition 6 (2014/4848/P) – Granted 11/11/2015

3.3

The approved scheme comprises:

- 1 a one storey roof level extension to create additional office floorspace at 60-70 Shorts Gardens (366 sqm);
- 2 a two storey roof level extension to create additional office floorspace at 14-16 Betterton Street (187 sqm);
- 3 demolition of the existing ventilation shaft on Shorts Gardens and the creation of a new entrance at ground floor level with additional office space above;
- 4 alteration, refurbishment and change of use of the ground floor level of 60-70 Shorts Gardens to provide three commercial units, comprising A1 (retail) A2 (financial or professional institution) and D1 (Non-residential institution) use (763 sqm);
- 5 alterations to the façade of 14-16 Betterton Street, with the creation of a new building entrance;
- 6 alteration, refurbishment and change of use of the existing basement to create space for either a B1 (office); D1 (non-residential institution) or D2 (assembly and leisure) use, in accordance with Condition 2 of the planning permission, with the principal access gained from Shorts Gardens and access for servicing gained from Betterton Street (783 sqm).
- 7 refurbishment and alteration of existing office floorspace;
- 8 creation of a loading bay on Shorts Gardens and an extended cross over on Betterton Street;
- 9 reinstatement of pedestrian footway on Shorts Gardens; and
- 10 associated building plant, storage, refuse and cycle parking.

4.0 **Pre-application Advice and Consultation**

Pre-Application Consultation

- 4.1 The proposed alteration and extension of the Shorts Gardens site has been the subject of constructive pre-application discussions with LB Camden since June 2016. During this period a number of meetings have been held with planning, design and highway officers from LB Camden. In addition, the scheme was considered by Camden's Design Review Panel in January 2017 and public consultation events were carried out in February and March 2017.

Initial Pre-application meeting with LB Camden

- 4.2 Initial pre-application advice was requested by letter of 5 May 2016 in relation to three options:

- 1 Option 1: The creation of a large opening to the ground floor, with a central grand stair to access the basement and upper floors. The existing floorspace would be increased from 3,302 sqm to 4,858 sqm (GEA) through a roof extension stretching the length of the building. B1/D1/D2 would be located in the basement and basement mezzanine; B1/D1 at ground floor; and mezzanine; and B1 above;
- 2 Option 2: As option 1, but incorporating lightwells. The total floorspace would be 4,979 sqm; and
- 3 Option 3: Development of Shorts Gardens as in Option 1, but the creation of residential floorspace in Betterton Street. This option creates 3,963 sqm of commercial floorspace (GEA) and 601sqm of residential (GIA). The site could provide four no. 3 bedroom units.

- 4.3 Following a meeting in June 2016, written advice was provided by letter dated 8 August 2016. This confirmed:

- 1 For schemes of more than 200 sqm (gross) additional floorspace, 50% of all additional floorspace should be housing (to comply with Policies CS1 and DP1).
- 2 As the scheme would result in an uplift in floor area of over 1,000 sqm there would be a strong presumption of the housing provision to be provided on site.
- 3 The proposed mix of housing would be influenced by the character of the site and surroundings. All residential development with a capacity of 10 or more units would be expected to contribute to affordable housing.
- 4 There is a general desire to retain and potentially increase land and buildings suitable for business use.
- 5 Any proposal for unrestricted D2 use at basement level would need to demonstrate adequate mitigation measure to limit any potential impact on residential amenity. A summary of likely events and activities, servicing of the site and a noise report demonstrating the effectiveness of mitigation measures should be included with any formal submission.
- 6 Further improvements to the public realm, e.g. street lighting would be welcomed.
- 7 The demolition and replacement of the vent building was considered acceptable. The replacement vent building should maintain a traditional palette of materials and a more modest aesthetic.
- 8 The principle of additional floors is supported but would need to be justified in design terms. Any extension would be expected to remain architecturally sympathetic to the attractive and unique host property.

- 9 There would be a requirement for a Construction Management Plan and Travel Plan to be secured through a Section 106.

- 4.4 The pre-application advice confirmed that *“the application properties are both characteristic for their ages and original function, containing interesting detailing and reflecting the original character of the conservation area.”* It also confirmed that 60-70 is a positive contributor and in relation to 14-16 Betterton Street stated *“it is the view of conservation, design and planning officers that this property is important within the Betterton Street streetscene, particularly when read in conjunction with the nearby listed buildings. The character of this area (and particularly Betterton Street) has been eroded by sequential development and maintaining or enhancing those few surviving properties is now considered paramount. It should therefore be noted that the loss of the Betterton Street building, including via façade retention, would be resisted by the Council and development to the site would only be considered appropriate if it were to fully respond to this preserved character.”*

First Noise and Vibration Meeting: 9 November 2016

- 4.5 A site meeting was held on 9 November 2016 in order for officers to assess the noise and vibration related issues and any design and conservation matters. A note of the meeting was issued by LB Camden by letter dated 21 November 2016. This confirmed that a key concern was the issue of noise and disruption at the site and the potential impact on future residents. The guidance set out the requirement for the applicant to undertake a noise assessment and demonstrate that appropriate mitigation measures could be implemented. This was undertaken and submitted to Camden.
- 4.6 In terms of design, the visual impacts of the proposed extension on the long views of the property were discussed at the meeting, and the guidance recommended additional analysis and the preparation of cgis (particularly from the corner of Drury Lane and Betterton Street/Shorts Gardens). These were prepared by Stanton Williams and submitted to Camden.
- 4.7 The advice confirmed that the option with large rooflights and a helical stair was the preferred option.

Second Design Meeting: 8 December 2016

- 4.8 A second Design Meeting was held on 8 December 2016 to update officers on the scheme since the initial pre-application meeting, particularly in relation to treatment of the vent shaft and the opening up of the arches to provide a more active frontage. The potential use of the basement as a destination restaurant was also discussed.
- 4.9 The meeting discussed two key elements of the scheme – the replacement of the vent shaft and the opening up the arches to provide a more active frontage to Shorts Gardens. Stanton Williams noted the importance of retaining the symmetry of the two “bookends” of the building and the aim to retain the brick appearance whilst introducing a contemporary style. It was also noted that the vent shaft was disengaged from the rest of the extension. A series of fenestration options were discussed.
- 4.10 Camden officers confirmed that the revised massing at roof level took on board the comments officers had previously made. Officers confirmed that the building should retain an industrial feel, that key building features should be retained and that the use of steelwork and brick was appropriate. Camden officers advised that the proposed rhythm of the extension, and the relationship to the bays worked well.

- 4.11 In relation to the Betterton Street Property, officers confirmed that the introduction of commercial uses, such as a café or bakery would be acceptable. In regard to Shorts Gardens, officers considered that an A3 use would be less contentious than an A2 use and would have more controlled hours. A Management Strategy would be required which should consider exit arrangements, disturbance to local residents and noise from plant and extracts/ducting.
- 4.12 Officers also advised that the treatment of plant was important in order to ensure that it did not disrupt the design or become visible from Shorts Gardens.
- 4.13 The written guidance dated 19 December 2016 confirmed that *“the reduced massing of the extension resulted in a scheme which sits much more comfortably on top of the handsome host property and is far less conspicuous”*.

Second Noise and Vibration Meeting: 20 December 2016

- 4.14 A meeting was held to discuss the results of the noise and vibration assessment, proposed mitigation measures and the evolving design of the Betterton Street element of the scheme, following the initial noise and vibration meeting on site on 9 November 2016 and subsequent guidance issued by LB Camden on 21 November 2016.
- 4.15 The letter of 11 January 2017 confirmed that the noise assessment was comprehensive and that adequate mitigation measures could be installed within the Betterton Street property to isolate the upper floors from the structural born vibration emanating from the adjacent EDF transformers. Officers confirmed the need for a condition requiring a post completion noise survey.

Design Review Panel: 20 January 2017

- 4.16 The Design Review Panel held on 20 January 2017 confirmed that the proposed design responds well to the attractive existing buildings and has the potential to enhance both the site and surrounding area. A number of points were raised for further consideration:
- 1 The scope to retain and adapt the existing ventilation shaft (although the Panel accepted that if it has to be removed the proposed replacement would be successful).
 - 2 The form and boldness of the proposed roof on the Betterton Street building.
 - 3 Potential opportunities to achieve passive ventilation to enhance the buildings environmental sustainability, possibly using the vent shaft.
 - 4 The choice of materials to ensure the rawness of the building is retained.
 - 5 The scope to continue the glazing of the roof extension around its corners.
 - 6 The framing of the arches (which should be lighter).
 - 7 The potential to link through the building, connecting the two streets.
- 4.17 These issues have been considered as detailed in the Design and Access Statement. In relation to the vent shaft building, a structural report has concluded that the building is in a very poor condition and would require extensive rebuilding. The Heritage Impact Assessment has confirmed that it is not of historic interest. The Panel Report confirmed that if the aspects of the design highlighted in the report were reconsidered, there would be no need for the Panel to see the scheme again.

S106 and Highways Meeting: 14 March 2017

- 4.18 A further meeting was held with Camden officers to discuss the evolving design, to report back on the consultation events, discuss potential S106 requirements and review the proposed parking and servicing arrangements.
- 4.19 Officers supported the design changes to the scheme. In terms of the S106 it was acknowledged that the highway contributions from the previously consented scheme would be carried forward and that other contributions would be re-considered during the application process. Shorts Gardens LLP have entered into a short form memorandum with LBC to agree the exact terms of carrying forward the highway contribution from previously consented scheme.
- 4.20 Camden advised that the public highway works will need to be designed in accordance with Camden Streetscape Manual and designed, implemented and maintained by Camden Highways Department. Detailed design will occur after planning permission has been granted. Camden highway engineers will provide an estimated cost for undertaking this work, which will be controlled by means of a s106. The s106 Highways contribution from the previous scheme will be transferred to the new scheme.
- 4.21 The scheme proposes a half layby along the front of the site which would remain at footway level but be slightly re-graded so that it has a gradual slope towards the carriageway, thereby reducing the height of the kerb. Whilst the Highway officer advised that the preference would be for any servicing on site and making use of the existing crossover, it was noted that the previously consented scheme incorporated a loading bay on Shorts Gardens. On Betterton Street the existing cross over would be extended and used for a loading bay.
- 4.22 Officers advised that a Servicing Management Plan will be required as part of the application and will be controlled through a s106. In addition a draft CMP will be required to be submitted with the planning application which will be secured through the s106.
- 4.23 Cycle parking will be required to be provided in accordance with the London Plan. Visitor/short stay parking can be provided on the adjoining street and where this is not possible Camden may accept a contribution (£750 per cycle space).

Public Consultation

- 4.24 Public consultation has been undertaken by Quatro. This has involved discussions with local councillors and key stakeholders, local businesses and local community groups. In addition a two day Public Exhibition was organised on Saturday 25 February 2017 and Thursday 2 March. Details of the exhibition were distributed to 873 residential and commercial addresses in the area. In addition, a website was set up with details of the scheme and to obtain comments (<http://shortsgardensconsultation.com/>). Pre-exhibition meetings were held with key stakeholders (representatives from the Covent Garden Community Association, UKPN and Ward Councillor Sue Vincent attended the preview events) and in addition a presentation was made to the Covent Garden Community Association regarding the proposals. Quatro has also provided details of the proposals to the Bloomsbury Conservation Area Advisory Committee and the Seven Dials Trust.
- 4.25 The key issues raised during the consultation were:
- 1 Servicing and the potential impact of additional development as Endell Street is already very busy. An off-street servicing solution would be welcomed.
 - 2 Potential issues of noise and loss of privacy, particularly in relation to the nearby sheltered housing.

- 3 The potential impact of a restaurant in terms of opening times, late night noise and servicing.
- 4 The potential noise and location of plant.
- 5 Apprenticeships and whether there are any opportunities in addition to construction.
- 6 Community benefits and opportunities for community funding.

4.26

Ten people attended the exhibition on Saturday, with only two providing feedback at the exhibition itself. Of this written feedback, one was supportive and the other was more neutral (some concerns raised, but no major objections). Of those who attended, there were minimal concerns or objections. There were nine attendees on Thursday and two feedback forms were completed which were both supportive. A presentation was subsequently given to the Covent Garden Consultation Area Committee on 27 March 2017 to discuss the proposed scheme. Details are provided in the SCI produced by Quatro.

5.0

Statutory Planning Policy Context

Introduction

5.1

This section of the Planning Statement summarises national, strategic and local planning policy of relevance to the proposed development.

5.2

Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that in determining planning applications regard should be had to the development plan. The development plan for the application site comprises London Plan (2015) and the LB Camden Local Plan, which consists of the Core Strategy (2010) and Managing Development Document (2013).

5.3

Planning (Listed Buildings and Conservation Area Act) 1990 – Section 66 seeks to protect the settings of listed buildings and Section 72 seeks to preserve or enhance the character and appearance of conservation areas.

National Planning Policy Framework (2012)

5.4

The National Planning Policy Framework (2012) sets out the Government’s planning policies for England and states that the purpose of the planning system is ‘*to contribute to the achievement of sustainable development*’ (para 6). Paragraph 7 sets out the three dimensions of sustainable development: ‘*economic*’ in contributing to a strong and competitive economy; ‘*social*’ in supporting strong communities and providing the supply of housing required for present and future generations; and ‘*environmental*’ in terms of protecting and enhancing the environment.

5.5

Under the NPPF, it is incumbent upon decision-making authorities to support applications for sustainable development wherever possible and without delay, particularly where that development will help meet the challenges of housing need.

5.6

Paragraph 17 of the NPPF contains the core planning principles which includes securing high quality design, a good standard of amenity for existing and future occupants, reusing land that has been previously developed and conserving heritage assets in a manner appropriate to their significance.

5.7

Paragraph 47 aims to significantly boost the supply of housing. Paragraph 49 goes onto state that housing applications should be considered in the context of the presumption in favour of sustainable development.

5.8

Paragraph 56 states that the Government attaches great importance to the design of the built environment, as a key aspect of sustainable development.

5.9

In regard to heritage assets, paragraphs 133, 134, 135 and 138 are of key relevance. Paragraph 133 states that “*where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- *the nature of the heritage asset prevents all reasonable uses of the site; and*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use.”*

- 5.10 Paragraph 134 of the NPPF states that “*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use*”.
- 5.11 Paragraph 135 then states that “the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”
- 5.12 Paragraph 138 of the NPPF states that not all elements of a Conservation Area will necessarily contribute to its significance. “*Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.*”

The London Plan (2016)

- 5.13 Further alterations to the London Plan were published in March 2016. The London Plan (2016) provides the spatial development strategy for Greater London up to 2036 in order to respond to changes, including substantial population growth, a more diverse population, a growing and changing economy and changing climate. The overall objectives are to ensure that London expands opportunities for growth whilst achieving the highest environmental standards and quality of life. The policies noted below are of particular relevance to the application site.
- 5.14 Seven Dials and Covent Garden fall within the London Plan’s Central Activities Zone. Policy 4.7 supports a strong, partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centres. The scale of retail, commercial, culture and leisure development should be related to the size, role and function of a town centre and its catchment.
- 5.15 The London Plan aims to address housing need by providing an annual average of 42,000 net additional homes across London which will enhance the environment, improve housing choice and affordability and provide better quality accommodation. Camden has a minimum ten year target (2015-2025) of 8,892 homes, equating to 889 homes a year (Policy 3.3 and Table 3.1).

Office and Commercial uses

- 5.16 *Policy 4.2: Offices* supports the management and mixed use development and redevelopment of office provision to improve London’s competitiveness and to address the wider objectives of the Plan including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises. The policy seeks to meet the distinct needs of the Central London office market; and to consolidate and extend the strengths of the diverse office markets by promoting their competitive advantages, focusing new development on viable locations with good public transport, enhancing the business environment including through mixed use redevelopment and supporting managed conversion of surplus capacity to more viable, complementary uses. The policy also encourages the renewal and modernisation of existing office stock in viable locations to improve its quality and flexibility (part (c)); and seeks to increase the current stock (part (d)).

5.17 *Policy 4.3: Mixed use development and offices* states that within the Central Activities Zone increases in office floorspace should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies.

5.18 *Policy 4.6: Support for and enhancement of arts, culture, sport and entertainment* supports the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises. Paragraph 4.38 notes that local circumstances will determine whether night time economy activities should be encouraged in a specific area.

Housing

5.19 Paragraph 3.14A states that "the Mayor recognises the pressing need for more homes in London and to help boost significantly the supply of housing, this Plan sets out the average annual minimum housing supply targets for each borough until 2025."

5.20 Policy 3.3: Increasing Housing Supply notes that developments should provide Londoners with real housing choice which meets their needs. Boroughs should seek to achieve and exceed their relevant borough housing targets and should seek to enable development capacity to be brought forward through mixed use redevelopments. Paragraph B of Policy 3.3 requires provision consistent with at least an annual average of 42,000 net additional homes across London in order to enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners.

5.21 Policy 3.4: Optimising Housing Potential of the London Plan encourages developments to optimise housing potential and meet the density standards set, whilst taking account of local context and character including the PTAL. Table 3.2 sets out appropriate density levels by PTAL and setting.

5.22 With respect to Policy 3.5: Quality and Design of Housing Developments, the design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces. Minimum space standards are set out in Table 3.3 of the London Plan.

5.23 Policies 3.8: Housing Choice, 3.9: Mixed and Balanced Communities and 3.11: Affordable Housing Targets respectively promote housing choice in new developments, in terms of size and type; promote communities mixed by tenure and household income; and seek to maximise affordable housing provision.

Climate Change

5.24 Policy 5.1: Climate Change Mitigation seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025; and Policy 5.2: Minimising Carbon Dioxide Emissions requires that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's energy hierarchy: 1 Be lean: use less energy; 2 Be clean: supply energy efficiently; and 3 Be green: use renewable energy. For residential development there is a requirement for zero carbon (2016-2031). For non-domestic buildings the requirement is in accordance with building regulations.

5.25 Policy 5.3: Sustainable Design and Construction requires that development proposals should demonstrate that sustainable design standards are integral to the proposal; whilst Policy 5.11: Green roofs and development site environs promotes green roofs; and Policy 5.13: Sustainable Drainage requires new developments to utilise sustainable urban drainage systems (SUDS).

Environment

- 5.26 Policy 7.4: Local Character requires development to have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.
- 5.27 Policy 7.5: Public Realm states that public spaces should be secure, accessible, legible, inclusive, connected, easy to understand and maintain, relate to local context and incorporate the highest design quality landscaping, planting, street furniture and surfaces.
- 5.28 Policy 7.6: Architecture states that architecture should make a positive contribution to coherent public realm, streetscape and wider cityscape and should incorporate the highest quality materials and design appropriate to its context.

Heritage

- 5.29 Policy 7.8: Heritage Assets and Archaeology indicates that developments should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Likewise, developments affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Transport

- 5.30 In relation to transport, Policy 6.1: Strategic Approach encourages the closer integration of transport and development in order to reduce the need to travel, especially by car. Policy 6.9: Cycling promotes an increase in cycling by promoting a network of cycle routes and operating and improving cycle hire schemes; and requires developments to provide secure, integrated convenient and accessible cycle parking in line with the minimum standards set out in Table 6.3 of the Plan. These are summarised below:

Table 5.1 London Plan Cycle Parking Requirements

Residential Long stay: 1 space per studio and 1 bedroom unit; 2 spaces per all other dwellings. Short Stay: 1 space per 40 units
A1 Retail Long Stay: From a threshold of 100sqm, first 100sqm: 1 space per 250sqm thereafter: 1 space per 1000sqm. Short Stay: from a threshold of 100sqm: first 1000sqm: 1 space per 125sqm thereafter: 1 space per 1000sqm
Office/B1 Long Stay: 1 space per 90sqm Short Stay: first 5,000sqm, 1 space per 500sqm thereafter: 1 space per 5,000sqm
A3 Restaurant/Café Long stay: 1 space per 175 sqm Short stay: 1 space per 500 sqm
D1/D2 use Long stay: 1 space per 5 staff Short stay: 1 space per 3 staff

- 5.31 *Policy 6.10: Walking* promotes the quality of the pedestrian and street environment, including the use of shared space principles, promoting simplified streetscape, decluttering and access for all. *Policy 6.13: Parking* requires an appropriate balance between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.

Camden Core Strategy (2010)

- 5.32 The Camden Core Strategy sets out the key elements of the Council's planning vision and strategy for the borough. The key policies of relevance to the application site are outlined below.
- 5.33 *Policy CS1: Distribution of growth* states that “the Council will focus Camden's growth in the most sustainable locations and manage it to make sure that we deliver its opportunities and benefits and achieve sustainable development, while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit”. The policy also promotes the most efficient use of land and buildings.
- 5.34 *Policy CS5: Managing the impact of growth and development* states that particular consideration will be given to:
- a providing sustainable buildings and spaces of the highest quality; and
 - b protecting and enhancing our environment and heritage.
- 5.35 *Policy CS6: Providing Quality Homes* of the Core Strategy seeks to maximise the supply of additional housing to meet or exceed Camden's target of 5,950 homes from 2007 to 2017; or 8,925 homes for the period 2010-2025; and also confirms that housing is the priority land use.
- 5.36 Paragraph 6.39 of the Core Strategy states that the Council's dwelling size priorities for market housing are 2-bedrooms (highest priority), followed by 3 and 4-bedrooms (medium priority). For social rented the highest priority is for homes with 4-bedrooms or more, followed by 3-bedroom (high priority) and 2-bedroom (medium priority). For intermediate affordable housing the priority is for homes with 3-bedroom or more, but homes of all sizes are required.
- 5.37 As noted at paragraph 6.41 of the Core Strategy, the Council requires that 10% of homes should either be designed to be wheelchair accessible, or easily adaptable (i.e. compliant with Lifetime Homes standards).
- 5.38 *Policy CS7: Promoting Camden's centres and shops* aims to promote successful and vibrant centres throughout the borough. The application site is not located within a town centre, central London frontage or neighbourhood area. However, policy supports appropriate retail provision in Camden's Specialist Shopping Areas. The policy states that it will:
- ensure that new development is of an appropriate scale and character for the centre in which it is located (part (e));
 - provide for, and maintain a range of shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice (part (f)); and
 - make sure food, drink and entertainment uses do not have a harmful impact on residents and the local area (part (h)).
- 5.39 The supporting text at paragraph 7.18 notes that “food, drink and entertainment uses add to the diversity and vibrancy of Camden's centres and bring activity to them outside normal shopping hours...these uses are important to the borough socially, culturally and economically and contribute to Camden's image as a vibrant and attractive place”. However, paragraph 7.18 also notes that “local residents can be affected by disturbance and anti-social behaviour associated with some of the people visiting such premises”. The policy therefore aims to ensure that whilst promoting Camden as a successful location for food, drink and entertainment the quality of life of local people, workers and visitors is not harmed.
- 5.40 *Policy CS8: Promoting a successful and inclusive Camden economy* states that the Council will secure a strong economy. This will be achieved through the expectation of a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized

enterprise. Policy also recognises the importance of other employment generating uses including retail, markets, leisure, education, tourism and health.

- 5.41 *Policy CS9: Achieving a successful Central London* supports and promotes the Central London Area of Camden as a successful and vibrant part of the capital. This will be achieved by supporting Central London as a focus for Camden's future growth in homes, offices, hotels, shops and other uses.
- 5.42 *Policy CS11: Promoting sustainable and efficient travel* promotes the availability of sustainable transport choices in order to support Camden's growth, reduce the environmental impact of travel, and relieve pressure on the borough's transport network. In order to promote walking, cycling and public transport the Council will improve public spaces and pedestrian links, improve facilities for cyclists and work with TfL to improve the local public transport network including buses, Underground, Overground and Thameslink.
- 5.43 *Policy CS13: Tackling climate change through promoting higher environmental standards* encourages development to minimise carbon.
- 5.44 *Policy CS14: Promoting high quality places and conserving our heritage* states that the Council will require development to be of the highest standard of design that respects local context and character; preserve and enhance Camden's rich and diverse heritage assets and their setting; promote high quality landscaping and works to streets and public spaces; and seek the highest standards of access.

Camden Development Management Policies (2010)

- 5.45 The following development management policies are of relevance to the future development of Shorts Gardens and Betterton Street.
- 5.46 *Policy 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.
- 5.47 *Policy DP3: Contribution to the supply of affordable housing* requires all residential development with a capacity of 10 or more *additional* dwellings to make a contribution to the supply of affordable homes. Policy DP3 states that the Council will negotiate the development of individual sites and related sites to seek the maximum reasonable amount of affordable housing on the basis of an affordable housing target of 50% of the total addition to housing floorspace, but will apply the target with regard to a sliding scale from 10% for developments with capacity for 10 dwellings to 50% for developments with capacity for 50 dwellings (or 10% of 1,000 sqm up to 50% for 5,000 sqm).
- 5.48 *Policy DP5: Homes of Different Sizes* states that the Council will seek to ensure that all residential development contributes to meeting the priorities set out in the dwelling mix priority table and expects a mix of large and small homes. However, regard will be had to the character of the site, any site constraints and the economic and financial viability of the site, including the demand for homes of different sizes.
- 5.49 *Policy DP6: Lifetime homes and wheelchair homes* requires all housing development to meet wheelchair home standards. 10% of housing developments should either meet wheelchair housing standards or be easily adaptable to meet these.
- 5.50 *Policy DP12: Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses* states that the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the

amenity of neighbours. This will be achieved through considering the effect of non-retail development on shopping provision and the character of the centre. The Council will use planning conditions and obligations to address any issues associated with these uses.

- 5.51 Supporting paragraph 12.11 requires that food, drink and entertainment uses be managed to protect the amenity of residents and the potential for additional housing in the area and states that the Council will consider applying controls on hours of operation; refuse and litter; noise/vibration; fumes; customer area; local management issues; and changes of use.
- 5.52 *DP13: Employment sites and premises* states that the Council will retain land and buildings that are suitable for continued business use. The Council will consider mixed use where the level of employment floorspace is maintained or increased; other priority uses such as housing are included; and premises are suitable for new, small or medium enterprises.
- 5.53 *Policy DP16: The Transport implications of development* require that development is properly integrated with the transport network and that appropriate measures are incorporated for safe pick-up and drop off.
- 5.54 *Policy DP17: Walking, cycling and public transport* promotes walking, cycling and public transport.
- 5.55 *Policy DP18: Parking standards and limiting the availability of car parking* seeks to ensure that development provides the minimum necessary car parking provision.
- 5.56 *Policy DP19: Managing the impact of parking* states that the Council will resist development that would add to on-street parking demand where on-street parking spaces cannot meet existing demand.
- 5.57 *Policy DP22: Promoting sustainable design and construction* encourages the incorporation of green or brown roofs and green walls and requires new housing to meet Code Level 4 by 2013 and Code Level 6 (zero carbon) by 2016.
- 5.58 *Policy DP24: Securing high quality design* requires all developments including alterations and extensions to existing buildings to be of the highest standard of design and will expect developments to consider character, setting, context and the form and scale of neighbouring buildings. Where alterations and extensions are proposed the character and proportions of the existing building should be considered, as well as the quality of material used, provision of a visually interesting street frontage and accessibility.
- 5.59 *Policy DP25: Conserving Camden's heritage* states that the Council will (a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas; and (b) only permit development within conservation areas that preserves and enhances the character and appearance of the area.
- 5.60 *Policy DP26: Managing the impact of development on occupiers and neighbours* requires development to take into account such matters as privacy, overlooking, overshadowing, outlook, daylight and sunlight, noise and vibration, odour, fumes and dust and microclimate.
- 5.61 *Policy DP27: Basement and lightwells* states that in determining proposals for basement and other underground developments, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. Developers will be required to demonstrate that schemes maintain the structural stability of the building and neighbouring properties, avoid adversely affecting drainage and run-off or causing other damage to the water environment, and avoid cumulative impacts upon structural stability or the water environment in the local area. Consideration will also be given to

any potential impact on residential amenity, open space and landscaping and the appearance or setting of the property or established character of the surrounding area.

5.62 *Policy DP28: Noise and vibration* states that the Council will seek to ensure that noise and vibration is controlled and managed and will not grant planning permission where development is likely to generate noise pollution. Conditions and planning obligations may be used to control noise during demolition and construction.

5.63 *Policy DP32: Air Quality and Camden's Clear Zone* requires air quality assessments where development could potentially cause significant harm to air quality. Mitigation measures will be expected in developments that are located in areas of poor air quality.

London Borough of Camden Local Plan (2016)

5.64 The Council submitted the Camden Local Plan for examination by the Secretary of State for Communities and Local Government on 24 June 2016. Policies within the Draft Local Plan are therefore afforded limited weight as it is not a formally adopted statutory document. Of relevance to the proposed development are the following emerging policies:

- 1 Policy G1: Delivery and location of growth
- 2 Policy H1: Maximising housing supply
- 3 Policy H6: Housing Choice and mix
- 4 Policy E1: Promoting a successful and inclusive Camden economy
- 5 Policy E2: Employment premises and sites
- 6 Policy A4: Noise and Vibration
- 7 Policy A5: Basements and Lightwells
- 8 Policy D1: Design
- 9 Policy D2: Heritage
- 10 Policy CC1: Climate change mitigation
- 11 Policy TC4: Food, drink, entertainment and other town centre uses
- 12 Policy T1: Prioritising walking, cycling and public transport.

Camden Planning Guidance

5.65 The Camden Planning Guidance documents provide advice and information on how the Council applies its planning policies. The CPGs of relevance are outlined below.

5.66 *CPG 1 Design (2015)* states that within conservation areas development will only be permitted where it preserves and enhances the character and appearance of the area. With regards to extensions and alterations, proposals should always take into account the character and design of the property and its surroundings.

5.67 *CPG 2 Housing (2015)* sets out relevant residential development standards.

5.68 *CPG 3 Sustainability (2015)* states that all developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy to reduce energy Consumption e.g. Be Lean, Be Clean, Be Green. Developments involving 5 or more dwellings and/or 500sq m (gross internal) floorspace or more are required to submit an energy statement which demonstrates how carbon dioxide emissions will be reduced in line with the energy hierarchy. All buildings, whether being updated or refurbished, are expected to reduce their carbon

emissions by making improvements to the existing building. Work involving a change of use or an extension to an existing property is included.

- 5.69 *CPG 4 Basements and Lightwells (2015)* sets out guidance on the requirements for new basement or other underground development, or an extension to existing basement of other underground development where planning permission is required.
- 5.70 *CPG 5 Town Centres, retail and employment (2013)* states that food, drink and entertainment uses are an important part of the mixed use character and function of Covent Garden. However additional food, drink and entertainment uses may cause harm to residential amenity and to the mix and balance of uses in the area.
- 5.71 CPG 6 Amenity (2011) provides guidance in order to ensure appropriate levels of amenity for residents, occupiers and visitors. It requires a detailed Noise and Vibration Report for a noise sensitive development in an area where existing noise sources are present; and a Daylight/Sunlight Assessment where there is potential to reduce daylight and sunlight levels. A Section 106 agreement will secure a construction management plan for the site. The guidance also provides details of the required level of amenity space for new 2 and 3-bed residential units (9.2 sqm and 12.8 sqm).

Seven Dials Conservation Area Appraisal (1998)

- 5.72 The Conservation Area Statement subdivides the conservation area into three. 60-70 Shorts Gardens is located in Sub-Area 3 whilst 14-16 Betterton Street is located in Sub-Area 1.
- 5.73 The Statement notes that within Sub-Area 1 the distinct layout around Seven Dials is the legacy of an ambitious building plan devised by Thomas Neale, a speculator and Master of the Mint, at the end of the 17th century (p6).
- 5.74 In terms of Sub-Area 3, the Statement notes “*The Block between Betterton Street and Shorts Gardens is occupied by a former LEB Substation. The Betterton Street brick façade has ventilation holes with glass brick surrounds. The site is an opportunity site.*”
- 5.75 The Seven Dials Conservation Area Appraisal contains the following guidelines:
- 1 SD2 states that appropriate design for the Conservation Area can reflect both the historic and the modern context and both traditional and contemporary materials may be appropriate; and
 - 2 SD7/SD8 states that in all cases, existing/original architectural features and detailing characteristic of the Conservation Area should be retained and kept in good repair, and only be replaced when there is no alternative, or to enhance the appearance of the building through the restoration of missing features. Original, traditional materials should be retained wherever possible and repaired if necessary. The choice of materials in new work will be most important and will be the subject of control by the Council.

6.0 **Proposed Scheme**

Introduction: Aims of Project

- 6.1 The proposed scheme for 60-70 Shorts Gardens and 14-16 Betterton Street comprises internal and external alterations to the property, including the addition of two storeys, in order to make use of 60-70 Shorts Gardens for a mix of Class B1/A3/D1/D2 uses and 14-16 Betterton Street for C3, A1 and D1 uses.
- 6.2 The overall objectives of the proposed alterations to the property are to:
- 1 Create a high quality mixed use development which will contribute to the vitality of the surrounding area;
 - 2 add two new floors above Shorts Gardens and Betterton Street;
 - 3 retain the existing office use but increase the office floorspace;
 - 4 create four residential units within the Betterton Street property;
 - 5 introduce a new flexible use for the disused basement space in Shorts Gardens;
 - 6 upgrade to the existing office floorspace to provide flexible office floor plates;
 - 7 adopt a sustainable approach to development;
 - 8 create a connection from the ground floor to the basement of Shorts Gardens;
 - 9 create roof terraces; and
 - 10 improve the streetscape and public realm to Shorts Gardens.
- 6.3 In design terms, the scheme achieves the following:
- 1 retain the main Shorts Gardens and Betterton Street frontages, but introduces modifications at ground floor level in order to enhance and preserve their characteristics;
 - 2 opens up the existing arches to Shorts Gardens to allow more light into the newly refurbished commercial spaces and to create a visual connection with the basement area;
 - 3 enhances the setting of the buildings;
 - 4 creates outdoor amenity space with scope to introduce sedum roofs and photovoltaics; and
 - 5 provides off street cycle parking and refuse areas.

Shorts Gardens

- 6.4 The proposed scheme will open up the existing bricked up arches and introduce full height glazing. This will allow more daylight into the newly refurbished commercial spaces, provide a visual connection to the large basement area and enhance the building's character and relationship to Shorts Gardens. One arch will accommodate a single set of new metal and glass entrance doors. The window and door frames will be constructed of bronze coloured aluminium. The existing crittall windows to the first and second floors will be refurbished or replaced with matching double-glazed metal windows and painted dark grey.
- 6.5 A two storey roof top extension, curved along the Shorts Gardens frontage, is proposed with stepped back elements at either end and a roof terrace at the front. The curved element will be constructed with a bronze coloured aluminium frame with full height glazing. The two recessed ends would comprise bronze coloured aluminium louvres with openable windows behind and matching perforated louvres. A bronze coloured steel balustrade is proposed to the roof terrace.

- 6.6 The north-eastern end of the Shorts Gardens frontage (70) will be retained and a new double-glazed, full height window will be inserted, in place of the existing door. Metal louvres and doors will also be inserted to the east of this window.
- 6.7 The vent building (60) at the north west of the building will be demolished and replaced with a high quality extension comprising bronze coloured aluminium louvres and doors at ground floor with a brick work façade above. This will comprise a solid element and hit and miss brickwork with openable windows behind in a red brick to match the existing brick of Shorts Gardens.
- 6.8 The upper floors will be retained as B1 floorspace. A new use (potentially a restaurant or gallery) will be introduced into the currently disused basement space and a basement mezzanine and ground floor mezzanine will be introduced. A range of uses is currently being considered for the basement and ground floor area. Dedicated cycle and locker space for the office workers will be provided at basement level of the Betterton Street building, with access from the Shorts Gardens property. A sub-station will be introduced at ground floor level.
- 6.9 The extent of the recessed area at the front of the property will be repaved and external lighting introduced in order to enhance the setting of the building.
- 6.10 As part of the scheme it is proposed to lower the single storey basement area under the old vent shaft down to match the depth of the existing basement.

Betterton Street

- 6.11 The proposed scheme comprises of a two storey roof extension and alterations at ground floor level to provide improved access. The scheme proposes a sculptural brick and metal two storey extension to 14-16 Betterton Street. This will comprise a new feature roof, constructed of metal and new metal double glazed windows and doors. A small roof-terrace is proposed behind the parapet (for the 3-bed unit). The roof will be grey or bronze coloured metal (possibly zinc) with matching windows. New brickwork will be constructed of matching stock yellow/brown brick.
- 6.12 The scheme comprises four residential units (one 3-bed unit and three 2-bed units) from first to fifth floors, A1/D1 classes, potentially a gallery, coffee shop or yoga studio at ground floor level. The construction of the residential units would be a “box within a box” to mitigate the noise transmission from the neighbouring transformers as mentioned earlier. The units would be adaptable for wheelchair use and accessible via a lift. Cycle storage for eight bikes and refuse storage for the residential units would be provided at ground floor level. Plant will be provided at basement level (as well as at the roof of Shorts Gardens).
- 6.13 The scheme proposes the refurbishment of the front façade, including the refurbishment or replacement of the current windows to the upper floors with matching double-glazed metal windows and the removal of rainwater goods to remove clutter. At ground floor level, a new metal and glass entrance to the ground floor commercial unit (A1/D1) will be introduced with new windows above.

Proposed Uses

- 6.14 The proposed uses will contribute to the vitality of the area, which is already characterised by a mix of entertainment, restaurant, retail, office and residential uses. The existing office uses on the ground, first and second floor are retained, but additional office floorspace is created on the third and fourth floors, thereby contributing to the economic performance of the area.

6.15 A breakdown of the existing and proposed floorspace is below:

Table 6.1 60-70 Shorts Gardens: Existing and Proposed Floorspace

60-70 Shorts Gardens	Proposed use	Existing gea	Proposed gea	Existing gia	Proposed gia
Basement	D1/D2/A3	485	545	445	446
Basement Mezzanine	D1/D2/A3	219	459	138	361
Ground	B1/D1/D2	536	580	478	537
Ground Mezzanine	B1/D1/D2	306	298	251	243
First	B1	500	587	448	536
Second	B1	498	587	405	536
Third	B1	0	430	0	385
Fourth	B1	0	430	0	382
Total (sqm)	B1	2544	3916	2165	3426

Table 6.2 Betterton Street: Existing and Proposed Floorspace

14-16 Betterton Street	Proposed use	Existing gea	Proposed gea	Existing gia	Proposed gia
Basement	Ancillary	167	169	144	145
Ground	A1/D1	186	186	150	153
Ground Mezzanine	A1/D1	173	89	135	58
First	C3	185	187	156	158
Second	C3	185	187	156	162
Third	C3	183	185	162	166
Fourth	C3	64	142	43	130
Fifth	C3	0	113	0	97
Total (sqm)		1143	1205	946	1011

6.16 In terms of housing, there will be a two bed unit on the first, second and third floors; and a three bed unit on the fourth/fifth floor.

Amenity Areas

6.17 The 3-bed unit has a roof terrace of 34 sqm. The office roof terrace is 112sqm.

Parking and Servicing

6.18 The proposed scheme will be car free but provides eight cycle spaces for the residential units and 33 long stay spaces for the commercial floorspace. In addition 16 short term spaces will be provided on Shorts Gardens and Betterton Street. It is proposed to remove a single on-street car parking bay on Betterton Street to provide five cycle racks (10 bicycles). On Shorts Gardens an additional three cycle racks (six bicycles) will be provided.

6.19 A half length lay-by is proposed on Shorts Gardens for deliveries. This would remain at footway level, but be slightly re-graded so that it has a gradual slope towards the carriageway thereby reducing the height of the kerb. This would allow vehicles to easily park, but allow the width of the existing footway to be maintained for pedestrians when vehicles are not parked in this area. On Betterton Street the existing cross over would be extended and used for a loading bay.

Sustainability

- 6.20 The scheme has been designed to meet the equivalent of the former Code for Sustainable Homes Level 4 for the residential units; and for the commercial element, at least “Very Good” but aspiring to Excellent (BREEAM).

Management Plan

- 6.21 A draft Management Plan has been prepared by Span Group to accompany the planning application. The primary commercial and public access to the Shorts Gardens building will be via Shorts Gardens, using one of the newly opened arches. An internal semi-public arcade has been designed into the scheme and acts as a buffer space between the external streetscape, the office entrance and the entrance to the basement. This internal arcade will be monitored by staff from two separate reception areas (one for basement area and one primary reception for the rest of the building). These areas will continuously monitored and in addition there will be a series of discrete CCTV surveillance cameras covering the entrances and exits on both Shorts Gardens and Betterton Street. Access into the building will be through the manned reception areas, and fob access to lifts, stairs and ancillary space. All tenants will be subject to leases with strict operating times and procedures that tenants must adhere to. In addition, servicing and deliveries will be controlled. The access to the residential units in Betterton Street will be via a dedicated entrance door located on the Betterton Street elevation. The commercial unit on the ground floor will also be accessed via dedicated entrance doors located on this elevation.

Construction Management Plan

- 6.22 It is anticipated that construction will start on site in September 2018. A draft Construction Management Plan has been prepared by Hush. This sets out the key objectives in terms of segregating operatives and visitors entering the site from the working areas; frequent team meetings to update, advise and co-ordinate construction; regular liaison with Camden officers and resident and local groups; and the use of trained road marshalls to direct and control vehicle and pedestrian movements. Hoarding will be erected around the site to reduce noise and disturbance. In general access to the site will be via Drury Lane and Shorts Gardens and egress via Shorts Gardens to Mercers street and then to Shaftesbury Avenue. However, it will be necessary to close Shorts Gardens on two occasions to vehicles to allow a building mounted crane to be erected on (and then removed from) the third floor. It will also be necessary to close the pavement, two resident parking bays and four cycle stands in front of the Shorts Gardens property.
- 6.23 Working hours will generally be 8am to 6pm on Monday to Friday and 8am to 1pm on Saturdays, with no working on Sundays or Public Holidays. The project will be registered under the Considerate Constructors Scheme and will conform to the code of practice relating to site appearance, respecting community, protecting the environment and ensuring safety.

7.0 **Technical Assessments**

Introduction

- 7.1 This Section summarises the Technical Assessments which have been undertaken to assess the scheme.

Design and Access Statement

- 7.2 The Design and Access Statement prepared by Stanton Williams sets out the objectives and design principles for the development including the proposed access arrangements. It provides details of the scheme and also discusses how the scheme has evolved during pre-application discussions with Camden officers and to respond to comments raised by the Design Review Panel.

Heritage Impact Assessment

- 7.3 The Heritage Impact Assessment prepared by Lichfields describes the significance of the heritage assets with the potential to be affected by the proposed scheme, and the effect of the development on that significance.
- 7.4 The proposed works to 60-70 Shorts Gardens will replace the redundant Vent building at the north west of the site with a well-designed modern building which complements the adjoining 62-70 Shorts Gardens and respects the Conservation Area. The proposed two storey roof extension is set back from the front of the building and is designed to be no taller than existing buildings within the same terrace. The refurbishment of the windows and the façade, as well as the opening up of the ground floor arches, represent an enhancement to the building, which is a non-designated heritage asset. Its significance would be enhanced.
- 7.5 The proposed refurbishment and extension of 14-16 Betterton Street will improve the symmetry of the façade and the modern roof extension will complement the Conservation Area. It is set back from the front of the building to reduce its visibility from street level and in long views along Betterton Street. The building will remain lower than other development within the street. The proposals represent an enhancement to the building, which is a non-designated heritage asset. Its significance would be enhanced.
- 7.6 The proposals will improve the appearance of the buildings within the Conservation Area and will introduce a well-designed high quality modern development. The proposals will enhance the character and appearance of the Conservation Area whilst maintaining its significance. Similarly the proposals will enhance the setting of the nearby Grade II* and Grade II buildings whilst preserving their significance.

Air Quality Assessment

- 7.7 Green Air Monitoring carried out a preconstruction air quality monitoring survey at 60-70 Shorts Gardens. The external monitoring was conducted in three external areas, one in the morning, one in the noon and one in the afternoon on 1 February 2017. The scope of the survey was to monitor background levels of ozone, PM_{2.5}, PM₁₀, carbon monoxide and nitrogen dioxide in compliance with the guidelines in the WHO '*Air Quality Guidelines for particulate matter, ozone, nitrogen dioxide and sulphur dioxide*', (2005) and to confirm that the application site had an acceptable air quality, in accordance with London Plan and Camden policies.

7.8 The survey found the following results:

- 1 Ozone: External ozone levels did not exceed 10 ppb.
- 2 PM₁₀ Particulate: External PM₁₀ particulate level did not exceed 47 µg/m₃.
- 3 PM_{2.5} Particulate: Three external areas were tested for PM_{2.5} and the results of 16 µg/m₃, 41.5 µg/m₃ and 28 µg/m₃, were recorded.
- 4 Carbon Monoxide: Carbon monoxide levels were less than 1ppm.
- 5 Nitrogen Dioxide: External nitrogen dioxide levels (NO₂) were measured at <15 ppb. There is no WELL standard for nitrogen dioxide.

7.9 Most of the air quality tests produced satisfactory results, but a high PM_{2.5} can be from some high congestion contaminants produced by traffic or by nearby building construction. The assessment concluded that the external air quality complied with the WHO Air Quality Guidelines as all levels of particulate matter, ozone, nitrogen dioxide and sulphur dioxide were found to be present below the appropriate limit. The assessment therefore confirms that the air quality complies with London Plan and Camden policies.

Daylight and Sunlight Assessment

7.10 An assessment of the potential impact of the development on existing daylight and sunlight has been undertaken by GIA in order to assess the impact of the proposed development at 60-70 Shorts Gardens and 14-16 Betterton Street upon neighbouring residential properties. In total 11 properties were assessed for daylight and sunlight, of which 10 will achieve BRE compliance in relation to VSC, NSL and APSH. Of the 89 windows assessed, 63 (70%) will meet the BRE Guidelines for VSC and 49 (90%) of the 54 rooms assessed will achieve BRE compliance in relation to NSL. With regards to sunlight, all (100%) rooms assessed will comply with the BRE Guidelines for APSH.

7.11 One property (18-20 Betterton Street) adjacent to the site experiences changes in VSC and NSL which are below the suggested BRE Guidelines. GIA obtained a floor plan of the fourth floor and internal photographs of 18-20 Betterton Street and on the basis of the information obtained, made informed assumptions as to the room uses facing the application site and believe that the principle living spaces are located to the front of the property overlooking Betterton Street. The windows facing the site are likely to serve less sensitive bedrooms and small galley style kitchens. As a result it is considered that the main living spaces will not be affected by the redevelopment of the site. Whilst the impact to the rooms facing the site will be in breach of the BRE Guidelines, due to the constrained nature of the site and its proximity to the development it is considered that any reasonable additional massing will cause alterations in daylight at 18-20 Betterton Street.

7.12 Given the urban location, the BRE Guidelines should be interpreted flexibly as the daylight and sunlight targets are based on a suburban location. The report therefore concluded that the majority of properties (90%) will adhere to the BRE Guidelines.

Noise and Vibration Assessment

7.13 RBA Acoustics have prepared an Acoustic Assessment Report. Continuous noise monitoring was undertaken over a four day period (Thursday to Monday) during November 2016 in order to establish the level of external noise and the level of noise within the Betterton Street property during day and night-time periods. Noise levels were taken outside the Betterton Street property and within the transformer yard in order to inform requirements for the level of acoustic glazing that will be required to meet Camden's noise conditions. The assessment also provides acoustic

performance specifications in relation to any proposed plant and to counteract noise and vibration from the UKPN transformers.

7.14 The surveys found that noise and vibration was still evident at third floor level and due to the highly tonal nature of the noise source, the amount of noise and vibration varied significantly across the floor plates. Two potential mitigation measures are proposed: the isolation of the transformers or a structural solution (a box within a box).

7.15 RBA Acoustics have also undertaken an assessment of the impact of the plant. Preliminary plant selections were made and an initial assessment of noise has been carried out in order to assess the viability of the scheme for planning purposes. The equipment is to be located in two general locations on the roof of 60-70 Shorts Gardens. These indicative positions are indicated on the Site Plan 7431/SP1 in the Noise Assessment. Review of the octave band data concludes that there are no tonal characteristics associated with the proposed plant. The Nuaire extract fans would typically be supplied with Nuaire AVT6-MSM-X 500mm matched silencers. It is proposed to surround the rooftop plant by a 150mm thickness, 2.3m high acoustic louvered screen as indicated on 7431/SP1 in the Noise Assessment. The results of the preliminary assessment indicate that provided suitable mitigation measures are adopted atmospheric noise emissions from the proposed plant will satisfy the criteria required by Camden Council.

Energy and Sustainability Statement

7.16 The Energy and Sustainability Statement prepared by Cundall outlines the development's approach to sustainability, energy efficiency and renewable energy strategies in order to meet the London Borough of Camden and the Greater London Authority's (GLA's) planning requirements. The principal objective is to minimise the development's contribution to climate change through the reduction in CO₂ emissions. This will be achieved by reducing the development's demand for energy, meeting this demand through decentralised energy sources and incorporating renewable technologies. The following measures have been incorporated into the design:

- 1 Thermal insulation levels for all building elements to be enhanced beyond minimum Building Regulation standards;
- 2 Good solar control will be provided by the selection of glazing so as to avoid overheating in summer and encourage good daylighting levels;
- 3 Individual variable refrigerant flow (VRF) systems will be specified for each residential unit, retail unit and the office development;
- 4 All elements will be mechanically ventilated with heat recovery to reduce the heating demands associated with incoming fresh air. NO_x filters will be specified to improve indoor air quality on units in sensitive areas;
- 5 Indoor environments have been demonstrated to have a low-risk of overheating in line with the GLA's Cooling and Overheating requirements;
- 6 For the residential units, mechanical ventilation with heat recovery units will provide background ventilation and reduce the heat demand associated with incoming fresh air. Comfort cooling will be provided in all units to be used at the occupant's discretion;
- 7 Natural daylighting will improve occupant comfort and reduce the requirement for artificial lighting, reducing energy consumption; and
- 8 The development will use low energy lighting throughout;

7.17 The proposed combination of passive design measures and energy efficient systems will result in a 32% reduction in CO₂ emissions over the site-wide area weighted baseline. The use of variable

refrigerant flow heat pumps will be specified for the commercial and residential units and combined would result in a reduction in CO₂ emissions by a further 16% and an overall site wide CO₂ emissions reduction of 48% over the baseline, thus complying with Policy 5.2 of the London Plan. Non-domestic elements exceed the GLA's 35% reduction target. As the residential units are not classified as a major development there is not a requirement to achieve Zero Carbon. Instead, efforts have been maximised to reduce CO₂ emissions as far as possible within the constraints of the site.

7.18 The Energy Statement confirms that there is no scope to connect to a district energy network as per Policy 5.6 of the London Plan as there are no existing or proposed networks within a feasible connection distance to the development. Investigations into incorporating a combined heat and power (CHP) unit on site concluded that this was not a feasible option. An assessment of the scope to make use of low and zero carbon (LZC) technologies in accordance with Policy 5.7 discounted the use of photovoltaic panels, solar thermal and wind turbines as the development is within a conservation area.

7.19 In terms of sustainability, a number of sustainable measures are incorporated into the scheme including:

- 1 All insulation materials used within the proposed development will be selected to be CFC free both in manufacture and composition;
- 2 Building materials, where possible, will be sourced locally to reduce transportation pollution & support the local economy;
- 3 All timber will be purchased from responsible forest sources;
- 4 Recycling facilities will be provided on site for construction and operational waste;
- 5 Water use will be minimised by the specification of water efficient taps, shower heads, dual flush toilets and low water use appliances; and
- 6 The construction site will be managed in an environmentally sound manner in terms of resource use, storage, waste management, pollution. A Site Waste Management Plan (SWMP) will be produced for the works.

7.20 A preliminary BREEAM assessment has been undertaken, and this indicates that a 'Very Good' rating could be achieved with an aspiration of 'Excellent'.

Basement Impact Assessment

7.21 A Basement Impact Assessment has been prepared by Fluids to assess whether the small enlargement of the existing basement by lowering the single storey basement area to the west (under the old vent shaft) down to match the depth of the main area will impact on adjoining properties. A preliminary site investigation was completed by Soil Technics in March 2017. In addition a visual inspection of the property was carried out. On the basis of the current understanding of the building's structure it is anticipated that the building will be lowered by using an underpinning technique. This is expected to be required on the north, west and southern walls, as the eastern wall is assumed to be at the deeper level already. Within the boundary of the underpinning a new concrete lining wall will be installed to laterally resist the horizontal pressures and pick up the new concrete slabs. Potential risks include the lack of completed site investigation, required approval of the construction methodology with party wall surveyors, excavation within the water table and the presence of the Cross Rail tunnel and exclusion zone running below the site, which may influence the piling process. Whilst it is acknowledged that additional borehole investigations and trial pitting will be required, the report confirms that the initial site investigation demonstrates that the site would present

unacceptable risks from pollution and land instability and that the proposed basement extension is structurally feasible.

Transport Statement

- 7.22 The Transport Statement by Waterman sets out details of the current accessibility of the site and notes that the car ownership in the local area is 0.2%. On the basis of existing uses on the site it is estimated that travel to work is currently predominantly by public transport or coach (approximately 45%), with 8.3% of people arriving by car/van; 30.9% on foot and 4.4% by bicycle. It is estimated that the proposed development would generate 2,426 daily two way trips (including the basement) and the residential units 31 daily two way trips. Of these 1,461 would be by public transport, 117 by bicycle and 818 on foot. Overall, the proposed scheme would result in an additional 777 two way person trips per day over the permitted scheme.
- 7.23 Car parking and cycle parking stress surveys were carried out in the local area on 22 and 23 March 2017 at the times of 10:00, 14:00 and 18:30 in order to establish the peak periods of car and cycle parking and whether there was sufficient provision in the area. During the surveys, there were road closures on Shorts Gardens and Macklin Street, although the footways and cycle parking were not affected. The car parking stress surveys indicated that even with the road closures (and not including those spaces which were within the road closures) there was a maximum parking stress of 75% during the day (25 spaces available) and 87% in the evening (13 spaces available). The maximum cycle parking stress, with regards to cycle racks (not TfL hire bikes) for the area was 61% (47 spaces) during the evening. Betterton Street experienced a maximum stress of 43% (16 spaces available) and Shorts Gardens 25% (6 spaces available). This demonstrates that cycle parking in the area is not fully utilised.

Draft Framework Travel Plan

- 7.24 The draft Travel Plan Framework prepared by Waterman sets out a series of initiatives to be introduced to advise people of the existing transport opportunities and reduce the level of car usage. A Travel Plan co-ordinator will be appointed to monitor the Travel Plan. The objectives of the draft Travel Plan are to :
- influence the travel behaviour of staff;
 - generate fewer public transport trips than would otherwise be the case by encouraging a modal shift in travel;
 - reduce the need for unnecessary journeys;
 - Reduce the overall mileage; and
 - help improve the health of staff.
- 7.25 A Travel Plan Co-ordinator will be appointed to promote and encourage the use of travel modes other than the car. In addition, there will be an overall aim to reduce public transport use by 10% over five years and increase travel by cycle and foot.
- 7.26 A survey will be undertaken, under the supervision of the Travel Plan Coordinator, within the first six months following occupation of the building, in order to establish the travel patterns of the staff members accessing the site. Upon receipt of this information, targets will be amended or introduced to achieve the recommendations set out within the Travel Plan. Further monitoring will be undertaken annually for a period of no less than five years following the initial surveys.

- 7.27 Staff will be discouraged to use cars and will be encouraged to cycle or walk. Secure cycle parking and lockers and shower facilities will be provide on site and information will be available on cycle and pedestrian routes.

Delivery and Servicing Management Plan

- 7.28 The Delivery and Service Management Strategy prepared by Waterman proposes the use of a half length lay-by on Shorts Gardens along the application site frontage for deliveries. This remains at footway level, but will be slightly re-graded so that it has a gradual slope towards the carriageway thereby reducing the height of the kerb. This would allow vehicles to easily park, but allow the width of the existing footway to be maintained for pedestrians when vehicles are not parked in this area. When in use, the width of the footway would reduce to 1.8 metres. A plan showing the location and form of the layby is contained in the Delivery and Servicing Management Plan. On Betterton Street the existing cross over would be extended and used for a loading bay.
- 7.29 The Strategy estimates that throughout the day (7am to 7pm) there would be one delivery to the offices, three to the restaurant/café and one to the potential D1/D2 use within the Shorts Gardens site and that there would not be more than one delivery at any one time. Most of the deliveries would be by car/van and larger 7.5 ton vehicles would not be frequent. The proposed layby at 10.5 m in length can accommodate two vehicles at any one time. If there is a requirement for a restriction on delivery times for the layby, this should be between 7am and 6.30pm Monday to Friday. For the Betterton Street site, it is estimated that there would be around three deliveries a day, and that these would likely to be by a small van, which would make temporary use of a parking bay. End users will be encouraged to arrange deliveries after 10am and before 3pm when local roads are less busy.
- 7.30 It is assumed that the refuse would be collected directly from storage points within the properties on a weekly basis.
- 7.31 As detailed at Section 4 of the Servicing Management Strategy consideration was given to on-site servicing but this was discounted due to the insufficient area at ground floor level to enable a large vehicle to enter and exit in forward gear; and the insufficient structural loadbearing of the basement ceiling for HGVs.

Waste Management Strategy

- 7.32 The Waste Management Strategy is based on Camden Planning Guidance Note 1 which sets out specific guidance for residential developments of less than six units; and BS5906:2005 guidance for office and restaurant uses. It assumes a drag distance for refuse collection of around 10m.
- 7.33 The Strategy proposes five 140L bins for the four residential properties on Betterton Street and these would be located within the property. For the office use, it is assumed that there would be a total requirement of 15,000L on the basis of up to 300 people being employed on the site. The requirement for the restaurant use of 4,125L is on the basis of 55 covers; and that of the D1/D2 use 5,535L. The amount of storage required will be confirmed once an end user is confirmed. It can be reduced by the use of bin compactors on site.

Statement of Community Involvement

- 7.34 A Statement of Community Involvement (SCI) has been prepared by Quatro. This sets out the details of the consultation undertaken in terms of a public exhibition and meetings with statutory consultees, documents the feedback received from those who participated in the

consultation and provides details of how the applicant has developed the final scheme with the comments and suggestions of comments received during the consultation.

7.35 The SCI confirms that in general, the response from those who attended the public exhibition was very positive. Although feedback was very limited, there was general support for the development proposals, the design and the community benefits. The low level of interest and feedback in response to the consultation generally demonstrates a lack of local controversy surrounding these proposals.

7.36 The concerns expressed in relation to potential overlooking and noise have been addressed through the design, e.g. the introduction of screening. Any potential noise and disturbance during construction will be controlled through a detailed CMP, which will be subject to a planning obligation. Servicing and deliveries will be controlled by means of a Servicing Delivery Management Plan which will form part of the application. There will in addition be scope to control the hours of any end users by means of planning conditions.

7.37 The applicant will continue discussions and engagement with local residents and businesses following submission of the planning application.

8.0 **Assessment of Scheme**

Introduction

8.1 The following sections set out an assessment of the scheme in terms of the following key issues for consideration are:

- 1 Design and Heritage
- 2 Proposed office use
- 3 Housing provision and dwelling mix
- 4 Use of the Basement
- 5 Impact on Amenity
- 6 Transport and Servicing
- 7 Sustainability and Energy Strategy

Design and Heritage

- 8.2 The scheme has been carefully designed to reflect the character, massing and height of the surrounding area and Camden officers have confirmed that it is in keeping with the local area. As part of the proposed scheme, 60- 70 Shorts Gardens is retained and a high quality new extension added at roof level and in place of the vent building (no. 60). As part of the development, the front façade of the main building will be significantly improved with the opening up of the ground floor arches and upgraded/refurbished windows. The proposed height of the building is consistent in height with the four storey Hospital Building further west. The extension will be set back and gently curved to reduce its impact on views looking east and west along Shorts Gardens. The proposed design and materials will create a complementary but modern extension which adds architectural interest to the existing building. In addition, the opening up of the existing arches will create an improved street presence and activity.
- 8.3 The property at 14-16 Betterton Street will be retained and refurbished and the front façade will become more symmetrical. The proposed roof extension is comparable to the height of other properties, for example 26 Betterton Street, and is considered in keeping with the area. Moreover, the extension will be set back from the front of the building in order not to dominate the streetscape or the host building.
- 8.4 It is considered that both extensions are of a scale and mass that would not negatively impact upon neighbouring properties; and moreover, will respect the existing integrity and visual amenity of the host building. The proposed scheme is therefore in accord with London Plan Policy 7.4, Camden Core Strategy Policy CS14 and Camden Development Policy DP24 which requires all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and reflect the character, setting, context and the form and scale of neighbouring buildings. It is considered that the proposed alterations at ground floor level will be sympathetic to the street scene and will remain in keeping with the Seven Dials Conservation Area. Moreover, the proposed materials are considered in keeping with the adjacent buildings and wider Conservation Area.
- 8.5 The proposed external alterations at ground and roof level are of high quality and in keeping with the wider area and in relation to the provision of the residential units, accords with London Plan Policy 3.5 which promotes high quality homes and Camden Planning Guidance document: CPG1 Design. The Design has been subject of a Design Review and meetings with design officers and has evolved to reflect their comments.

- 8.6 In terms of heritage, the scheme accords with London Plan Policy 7.5 and local Policy DP25: Conserving Camden's Heritage and it is considered that the proposed extension and alterations to the properties will enhance the Seven Dials Conservation Area.
- 8.7 Whilst consideration has been given to the retention of the vent Building, a non-intrusive survey undertaken by Fluids Structural Engineers in March 2017 confirmed that the brickwork was of a poor condition, with evidence of cracking and that any repairs to the brickwork requiring new bricks would be difficult to match (see Appendix 1).

Proposed Office Use

- 8.8 The scheme retains and expands the existing office floorspace. London Plan encourages the provision of increased office floorspace within the Central Activities Zone (CAZ) (Policy 2.11) and promotes the availability of sufficient and suitable workspaces in terms of type, cost and size for larger employers and small and medium sized enterprises (Policy 4.1 of the London Plan). The proposed increase in office floorspace accords with Policy 4.2 of the London Plan which encourages the redevelopment of office provision to improve London's competitiveness. Camden Core Strategy Policy CS3 states that within Central London this area is considered a suitable location for offices, provided that they are of a suitable scale and character for the area in which they are situated. Core Strategy Policy CS8 encourages a variety of employment generating facilities. The proposed office floor space will be flexible, with floor plates ranging from 300 to 450 sqm and scope to subdivide the building if required. Existing office occupiers will be offered alternative accommodation by Span Group once their leases expire in September 2018.
- 8.9 The increase in B1/office floorspace in this location is therefore in line with policies contained within the London Plan and Camden Local Development Framework. Furthermore planning permission has previously been granted at the site for office use (2012/1533/P).

Housing Provision and Dwelling Mix

- 8.10 The provision of new housing units in this location is in line with the London Plan Policy 3.3 to increase the housing supply and Policy CS6 of the Camden Core Strategy, which promotes quality homes. The provision of residential units would contribute towards LB Camden's requirement to build 8,892 homes (889 a year) between 2015 and 2025. Furthermore Camden Core Strategy CS9 encourages the provision of residential units within the Central London Area in order to achieve a successful and vibrant capital.
- 8.11 The provision of housing on the site accords with Policy DP1 of Camden's Development Management Policies, which requires a mix of uses in developments in Covent Garden where more than 200 sq m (gross) of additional floorspace is provided, and that up to 50% of all additional floorspace in any scheme should be housing, subject to the criteria set out in the policy. The proposed scheme for Shorts Gardens/ Betterton Street results in an uplift of 1,487 sqm (gea). The provision of 814 sqm gea of C3 floorspace therefore meets the requirement to provide housing on site equivalent to 50% of this uplift, i.e. 743.5 sqm.
- 8.12 The scheme provides three 2-bed units and one three-bed unit which accords with the Council's dwelling size priorities for market housing for two-bedrooms (highest priority), followed by three and four-bedrooms (medium priority), set out at paragraph 6.39 of the Core Strategy.
- 8.13 The design of the residential units reflects the existing layout of the Betterton Street property and the need to retain the property following initial pre-application advice that the loss of the Betterton Street building, including via façade retention, would be resisted. Options to subdivide the floor areas to create a larger number of units were discounted as this led to a poor layout and

poor relationship to the existing building, in particular the need to sub-divide windows and was not felt to be appropriate.

- 8.14 Policy contained within the London Plan (Policy 3.13) and Camden Development Policies (Policy DP3) requires affordable housing to be provided for all residential developments creating ten or more units. As the scheme provides four units, no affordable housing provision is required.
- 8.15 It is therefore considered that providing residential units in this location is in line with London Plan Policies Policy 2.12, 3.3 and 3.8 and Camden Core Strategy Policies CS1, CS3 and CS9.
- 8.16 In terms of amenity space, Policy DP26 requires that residential development should provide outdoor space for private or communal amenity space wherever practical. CPG 6 'Amenity' provides required space standards for residential developments, which for a 2-bed unit is 9.2 sqm and a 3-bed unit 12.8 sqm. The 3-bed unit provides 34 sqm of amenity space which is above the 14.1 sqm for a 3-bed unit. There is no scope to provide private amenity space for the two bed units without altering the character of the existing building.

Use of Basement

- 8.17 The proposed scheme brings back into use the large basement area which has been vacant for some ten years. This will help to increase the mix of uses and vibrancy of the area. Given the scale and character of the basement it is important to find the right tenant to optimise the use of the space and so a range of uses are currently being considered. The use of the basement will be controlled through a Venue Management Plan which will form part of the s106 in order to ensure that any potential impacts on local residents are minimised. As detailed in the submitted Management Plan access to the buildings will be controlled and the area around the building will be monitored through CCTV cameras.
- 8.18 The Basement Impact Assessment has confirmed that from the initial site investigation the site is not considered to present unacceptable risks and that the proposed basement extension is structurally feasible.

Impact on Amenity

- 8.19 The scheme has been designed in accord with Development Management Policy DP26, which requires consideration of the future amenity of residents in terms of noise, disturbance, overshadowing, overlooking, privacy, direct sunlight and daylight, over dominance and outlook.
- 8.20 The extension at roof level has been set back from the roof parapet to ensure that the building would not cause any over dominance on the adjacent buildings or create any issues in terms of overlooking, overshadowing or loss of daylight/sunlight. Following the consultation events, screening has been introduced at roof level to reduce overlooking.
- 8.21 A Noise and Vibration assessment has been undertaken and mitigation measures put forward to ensure that residential amenity is acceptable. The proposed plant enclosure has an acoustic louvered screen of 2.3 m height and is set back from both the parapet and west and east facades to ensure that it is not visible from the street.
- 8.22 The Daylight Sunlight Assessment has confirmed that the majority of properties tested (90%) will adhere to the BRE Guidelines.

Transport and Servicing

Car parking

- 8.23 The application site has a PTAL rating of 6a and is in close proximity to many different modes of public transport. In addition there is good provision of public car parks in the vicinity of the site. No parking is proposed within the scheme, for either the residential units or the commercial floorspace, which complies with Policy DP19 which seeks the minimum necessary car parking provision. There is available on-street car parking for blue badge holders, who can park on single yellow lines and double yellow lines.

Cycle parking

- 8.24 Eight cycle parking spaces are proposed for the residential units which accords with the London Plan standard requirement of one space per studio and one bedroom unit and two spaces per all other dwellings. For the commercial floorspace, 33 cycle long stay cycle parking spaces are provided on site and 16 short stay parking spaces will be provided on-street. Further details are provided in the Transport Statement.

Servicing

- 8.25 A draft Servicing Plan has been submitted with the planning application. Servicing will be via a lay-by on Shorts Gardens. As detailed at Section 4 of the Servicing Management Strategy consideration was given to on-site servicing but this was discounted due to the insufficient area at ground floor level to enable a large vehicle to enter and exit in forward gear; and the insufficient structural loadbearing of the basement ceiling for HGVs. Tenants will be encouraged to receive deliveries between 10am and 3pm.

Energy and Sustainability

- 8.26 The Energy and Sustainability Statement has confirmed that the scheme has been designed to achieve carbon reductions within both buildings in accord with current policy and that a series of sustainable measures have been introduced.

Benefits of the Scheme

- 8.27 The overall benefits of the scheme include:
- 1 Additional jobs will be created through the expansion of the office floorspace and possible provision of a restaurant or gallery use. This is potentially 300 jobs in total, which would be an addition of 130 jobs over existing.
 - 2 Four new high quality residential units will be created.
 - 3 The scheme sensitively restores the existing facades and architectural details of the host property.
 - 4 Re-vitalising these under-utilised and out dated buildings in this key location.
 - 5 Modern and well serviced flexible office space.
 - 6 Introducing/activating a new use into the disused basement space.
 - 7 Public realm improvements and improved lighting would be introduced along Shorts Gardens.
 - 8 Up to 80 construction jobs and opportunities for apprentice training.
- 8.28 The scheme could result in the following economic benefits:

Construction Benefits

- 1 80 Direct Temporary Construction Jobs
- 2 120 Indirect/ Induced Supply Chain Jobs
- 3 £2.9 million GVA Economic Output (Direct and Indirect)

Operational Benefits

- 4 £22,000 in first occupation expenditure from the 4 residential apartments
- 5 £34,600 net additional resident expenditure in local shops and services each year
- 6 300 Direct Jobs supported by the new commercial floorspace
- 7 95 Indirect/ induced supply chain jobs supported across London
- 8 £22.6 million GVA Economic Output

Fiscal Benefits

- 9 £28,000 in New Homes Bonus over a four year period
- 10 £6,200 in Council Tax each year
- 11 £1.7 million Business Rates Revenues each year
- 12 A substantial financial contribution through CIL payments and S106 contributions

9.0

Summary and Conclusions

9.1

The proposed development at Shorts Gardens and Betterton Street comprises a high quality development which respects the character of the local area and of the host buildings and accords with relevant planning policy.

- 1 The principle of the proposed extension and alteration of the properties at the site has been accepted by Camden Council and the proposed mixed use complies with policy and guidance at all levels.
- 2 There is an existing implemented planning permission for the site which incorporates a roof extension, the refurbishment and alteration of the properties including the demolition of the vent shaft and alteration, refurbishment and the change of use of the basement to B1/D1/D2 uses.
- 3 The proposed extension and external works are of very high quality and have been designed to take account of and respond to the local context. Both of the proposed roof extensions will be subordinate to the properties and are considered to be in keeping with the host buildings and the wider conservation area. They will significantly enhance the area's townscape and public realm, and will strengthen the area's character and identity. This is a carefully conceived and responsive design solution which fully takes into account the historic significance of the host properties and the surrounding area.
- 4 The properties are located within the Seven Dials Conservation Area and the HIA has confirmed that there will be no harm to this heritage asset and that the scheme retains the historic and architectural integrity of both buildings.
- 5 The scheme has been designed in accordance with key design policies and its location within a conservation area. Moreover, the extension and refurbishment of the property meets the design standards set out in the London Plan and Camden Core Strategy and Development Management Plan.
- 6 The development of four additional residential units within this location will assist in meeting London Plan and Camden Council housing targets and is considered an appropriate use within the CAZ. This is a benefit in the light of London's pressing housing need and the role of Camden in fulfilling that need.
- 7 The proposed extension at 14-16 Betterton Street will provide a mix of residential unit sizes, including three 2-bed units which is the Council's priority as set out at paragraph 6.39 of the Core Strategy.
- 8 The provision of uses within Class B1 and D1/D2/A3 at 60-70 Shorts Gardens is considered appropriate in developing the function of the CAZ and ensuring that the area provides suitable services with variety, vibrancy and choice. Policy DP12 allows for food, drink and entertainment uses provided that the amenity of residents is protected. The use of the basement will be controlled by means of a Management Plan and a condition restricting the hours of use.
- 9 The proposed development will contribute meaningfully to economic growth and job creation. The scheme will result in an additional of 130 jobs and 80 construction jobs.
- 10 In terms of residential amenity, the scheme has been designed to ensure there is no material loss of privacy or overlooking, any impact in terms of daylight and sunlight, noise and vibration or construction impacts.

- 11 The development will be car-free and will maximise cycle parking, promoting sustainable travel behaviour amongst residents, occupiers and visitors.
- 12 The scheme is inherently sustainable, making optimal use of an accessible brownfield urban site and will deliver CO₂ abatement through energy efficient design. As set out in the Energy and Sustainability Statement the scheme meets Code level 4 and BREEAM Very Good and incorporates sustainable measures.
- 13 The Basement Impact Assessment has confirmed that there will be not adverse impact on drainage, flooding or ground water conditions.

9.2 These significant planning and regeneration benefits weigh strongly in support of the proposed development. Moreover, the proposed scheme embodies the principles of sustainable development promoted through the NPPF and complies with the objectives and requirements of the development plan.

**Appendix 1: Vent Shaft Structural
Condition prepared by Fluid Structures
(dated 5 April 2017)**

24499/PH/PM

5 April 2017



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To whom it may concern

Ref : Vent Shaft Wall Facing on to Shorts Gardens – Structural Condition

1. Introduction

- 1.1 We write in relation to the existing structural condition of the front wall to the existing vent shaft structure, and the implications on its possible re-use in the overall 62-70 Shorts Gardens refurbishment.
- 1.2 This report is based on a non-intrusive survey, viewed from the street level of Shorts Gardens. The survey was undertaken on 2nd March 2017, and the weather was fair and dry.
- 1.3 A number of photos are included as an appendix to this report, and should be used as a visual aide to accompany the text.
- 1.4 It is understood that the vent shaft structure was constructed in the very late 1800/early 1900 and was used to vent the large adjacent basement area, which contained the plant used by the London Electricity Board to provide power to areas of London.
- 1.5 It is understood that owing to the nature of the original use, no floor plates were present throughout its life

2. Condition, Features and Defects

- 2.1 The front wall of this shaft is circa 13.7m in height with a width of approximately 5.8m
- 2.2 There are no obvious signs of any out-of-plumbness to the naked eye, however this has not been confirmed by any surveys (digital or otherwise).
- 2.3 There are two window-type openings towards the top, with the “sill” level around 9m above ground level. No glazing is present. One opening has loose timber boarding partially covering the opening.
- 2.4 There are pairs of tie/strut head details located at circa 3.5m and 8m above pavement level, assumed to have been incorporated to prevent horizontal “spread” in the walls
- 2.5 There is an isolated “column” of brickwork with a different pattern running down the left hand corner (eastern

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side), which starts at approximately 4.5m above pavement levels and stops at approximately 11m above pavement level.

- 2.6 The bottom 3.0m of brickwork appears to have largely been reconstructed, however the eastern end may well be original. This eastern section is in a poor, very weathered condition. The reconstructed portion appears to be of a different brick type (red), and is of a different bond pattern (English) – the original being yellow London stock in a variation on a Flemish bond.
- 2.7 A crack is present near the north east corner of the building, extending from pavement level to circa 9m high. The crack is approximately vertical in nature, with a slight inclination towards the main body of the building. The crack width varies throughout the height, but typically gets narrower with height increase. Whilst not measured on site, the crack width in areas near the base is estimated to be in the region of 15-20mm. A “tell-tale” has been installed at approximately 4.25m above pavement level, indicating that minimal monitoring of the crack width was undertaken at some point. It is recommended that, if the brickwork is to be re-used, the crack is repaired by raking out the mortar joints and retro-fitting bedjoint reinforcement (heli-bar).
- 2.8 In the main the brickwork above 3m has been blackened, assumed to be due to years upon years of air-borne pollutants.
- 2.9 There are between two and four areas of slightly less discoloration, which have the slight appearance of bricked in window openings (they approximately align with the existing openings over). Factors that suggest against this theory are that the brickwork in the lighter area is fully toothed into the darker, and there are no brick arched lintels over. Whilst it would not be unheard of for the brickwork to be toothed in (although rare) to the sides, it is considered unlikely the methodology of an infill would have involved the demolition of the brick arched lintels. One of the lighter areas also has a tie beam going through its location. It is possible that these locations once incorporated a “fake” window to disguise the shaft as a more typical property, in a similar fashion to some vent shafts for the London Underground, and the removal of these features has left a slightly less weathered surface.
- 2.10 The condition of the brickwork has not been tested or intrusively investigated, however with much of the brickwork believed to be circa 100 years old and having been exposed to the elements on both faces for this period, it is expected that the condition may be poor, and may be reaching the end of its effective life span.

3. Proposed Scheme and Possible Effects on the Vent Shaft Structure

- 3.1 The proposed scheme seeks to incorporate large openings at 1st and 2nd floor to the north facing front façade of the vent shaft, which extend up to near the top of the existing wall to encourage natural light to permeate into the floor plate
- 3.2 A large opening is proposed at ground floor level to serve as a feature entrance to the property
- 3.3 Temporary stability of the remaining brickwork will have to be very carefully considered during the construction

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process, particularly taking account of the possible degraded structural condition. Even with good practice temporary works arrangements, a risk of collapse should not be underestimated.

- 3.4 A series of concrete “padstones” should be cast around the brickwork walls at the proposed floor levels to allow metal strapping/ties into the new floor plates to tie the walls back and meet the modern standards for building robustness. This will serve to replace and improve upon the existing strut/tie members that are present. The installation of these padstones should be very delicately undertaken, however there is a risk of effecting the surrounding brickwork, and a “domino effect” of damage and repair cannot be dismissed at this stage. As a minimum, a requirement for localised repointing is expected.
- 3.5 The proposals for the elevation and the likely condition of the brickwork will likely dictate that a degree of new brickwork will be required. Consideration should be given to how this new brickwork will appear when constructed adjacent to existing, as matching will likely be very difficult.

4. Opinion, Conclusion and Recommendations

- 4.1 Owing to the age of the brickwork and its continued exposure to the elements from both faces, it is likely that the brickwork is in a poor condition.
- 4.2 We would recommend that if there is a desire to retain the brickwork in-situ, a small panel should be removed and tested in a laboratory for its soundness, strength and robustness.
- 4.3 The formation of the proposed openings would require very careful temporary works consideration during construction, and the stability/robustness of any proposal would still likely have a dependency on the brick panel condition
- 4.4 Any repairs to the brickwork requiring new bricks may prove difficult to match with old, particularly matching the look/condition of the existing. This could lead to a patchy look of the wall.
- 4.5 The internals of the vent shaft have not been inspected, and may serve to enhance an opinion on the condition of the structure
- 4.6 Taking the contents of this report into account, and particularly the safety aspect, it is currently considered highly preferable to reconstruct the wall as new. The reconstruction would help ensure a safe construction, and would likely serve to prolong the working life of the building.

We trust the above is clear, however we would be more than happy to meet to discuss the contents should this be of use.



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Yours sincerely



Paul Hosford

For and on behalf of FLUID.STRUCTURES

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Photo 1 – Angled View of Front Façade, showing:

- Indication of alignment with party wall
- Existing openings
- Tie/strut headers
- Reconstructed area of brickwork to the bottom
- Discoloured “window” areas



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Photo 2 – Angled View of Front Façade, showing:

- “feature” brickwork to north-eastern corner



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Photo 3 – Side View, showing:

- Crack going up the wall, with tell-tale at around 4.5m above pavement level



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Photo 4 – Western Window Opening, showing:

- Brickwork towards the top of the wall appears to be circa 215mm thick



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