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# Planning Statement

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44-46 Eagle Street, Holborn

Prepared by Savills (UK) Limited

AFT Properties Limited

September 2017

# Planning Statement

44-46 Eagle Street, Holborn

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## 1. Introduction

- 1.1. This Planning Statement has been prepared by Savills (UK) Limited and is submitted in support of a full planning application. It is made on behalf of AFT Properties Limited (“the Applicant”) for the office refurbishment and external alterations at 44-46 Eagle Street in Holborn in the London Borough of Camden (“LBC” / “the Council”).

### **Description of Development**

- 1.2. Full planning permission is sought for the following:

*“Refurbishment of existing office floorspace and associated external works, including fenestration alterations, creation of a small rear garden office room, formation of external roof terraces, plant and associated works.”*

### **Overview of Development Proposals**

- 1.3. The proposal seeks to refurbish the existing office building. The majority of floorspace would provide a ‘Category A’ standard (representing the highest grade quality of office floorspace), thereby contributing to LBC’s high-quality office stock.
- 1.4. The internal alterations (which would not require permission) seek to reconfigure the existing awkward layout and consolidate the various circulation areas. This enhancement of the floor areas will result in a minor reduction by 13sqm.
- 1.5. New amenity spaces will be created through the implementation of two roof terraces, and the existing rear courtyard will be redeveloped to improve the quality of the space and provide a new garden room.
- 1.6. It is also necessary to undertake associated external alterations to the front and rear of the building. This is summarised in Section 3 of this Planning Statement and set out in detail in the submission drawings and Design and Access Statement.

### **Pre-Application Consultation**

- 1.7. The Applicant has engaged with LBC via their pre-application services and their feedback has informed the final design. Two formal meetings were held with officers at Camden’s offices, in addition to two site visit meetings.
- 1.8. The application was supported in principle by LBC. However, officers suggested the design of the Eagle Street elevation be revised in order to retain the historical appearance of the building, given its status as a positive contributor within the Bloomsbury Conservation Area. The Project Team subsequently amended the front façade alterations in view of these comments.
- 1.9. Full details of the pre-application consultation can be found in Section 3 of this Statement and in the accompanying Design and Access Statement.

## Supporting Information

- 1.10. This Planning Statement sets out the application proposals and relates them to national, regional (London) and local planning policies. This Statement should be read in conjunction with the drawings, Design and Access Statement, as well as the supporting documents. The full submission list comprises the following:
- **Design and Access Statement**, prepared by BuckleyGrayYeoman architects;
  - **Drawings** (location plan, existing and proposed – see separate issue sheet), prepared by BuckleyGrayYeoman architects;
  - **Noise Survey Assessment**, prepared by Hann Tucker;
  - **Archaeological Desk Based Assessment**, prepared by CgMs;
  - **Heritage Statement**, prepared by JLL Heritage; and
  - **Planning Statement** (this document), prepared by Savills.
- 1.11. In addition to the above, a completed Application Form/Ownership Certificate, Community Infrastructure Levy (CIL) Additional Questions Form and covering letter – prepared by Savills, have also been supplied. The relevant application fee has also been provided under separate cover.

## Structure of this Planning Statement

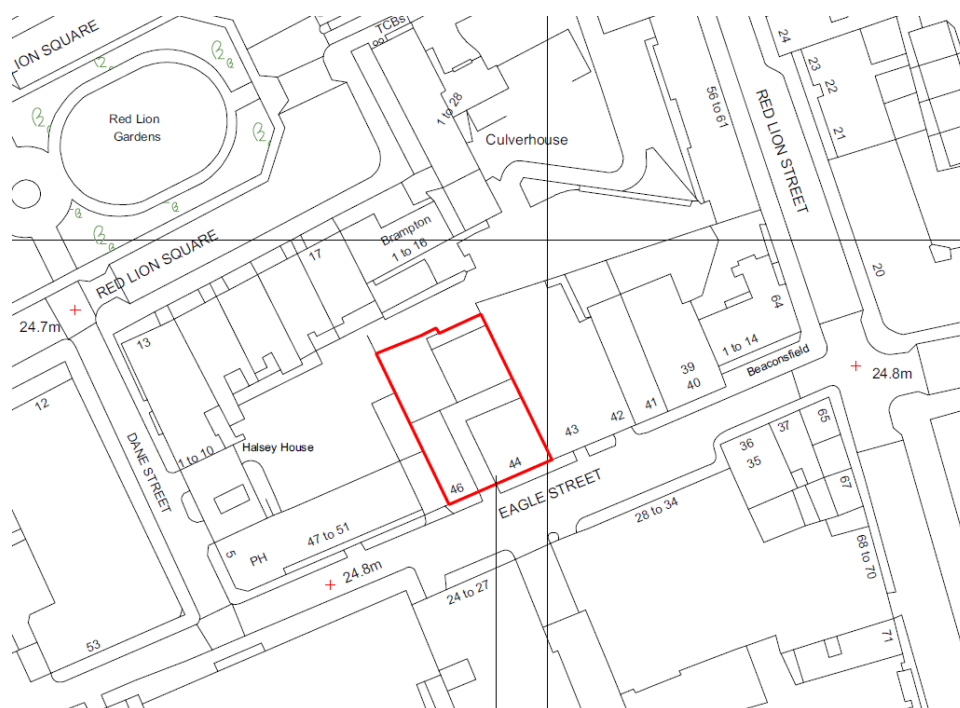
- 1.12. The structure of this Planning Statement is set out as follows:
- **Section 2 (Context of the Proposals)** provides background to the proposal, including a description of the site and surrounding area and planning history of the site;
  - **Section 3 (The Proposed Development)** sets out details of the development proposal;
  - **Section 4 (Planning Policy Framework)** sets out the relevant planning policy framework that the proposal is to be considered against;
  - **Section 5 (Planning Assessment)** sets out discussion of the material planning considerations arising from the application proposals; and
  - **Section 6 (Conclusions)** presents our conclusions.

## 2. Context of the Proposal

2.1. This section provides details of the background to the application proposals and provides the context within which the application is being made.

### Site, Location and Land Use Context

2.2. The site comprises approximately 0.05 hectares, as shown in **Figure 2.1** below:



**Figure 2.1: 44-46 Eagle Street, London WC1R 4FS (approximate site boundary outlined in red)**

2.3. The site is on the north side of Eagle Street. It backs onto a rear urban block comprising properties along Red Lion Square and Princeton Street to the north, Dane Street to the west, and Red Lion Street to the east.

2.4. The site accommodates an office building comprising ground and three upper levels plus a basement. There is an existing vehicle access at ground floor which slopes down to the rear (north) and opens out to paved courtyard, currently used for ad hoc/informal car parking.

2.5. The rear north-eastern part of the site accommodates a three level rear addition/extension (this includes a mezzanine level) which has a sloping roof. Throughout the building there are various lightwells and fire escape staircases.

2.6. At roof level there is an existing lift overrun and various plant equipment/enclosures. Maintenance staff can access the roof via a stair core which leads to the roof.

- 2.7. In the wider site context, Eagle Street is relatively quiet and features little traffic. It is predominately characterised by buildings of varying heights, ages and materials. Most of the street's building heights range from three to six storeys, although there are buildings of heights exceeding this. Uses along the street comprise a combination of residential and commercial.
- 2.8. 44-46 Eagle Street is not statutorily or locally listed, although the site is located within the Bloomsbury Conservation Area, and is noted within the associated Appraisal and Management Strategy that it is a building which makes a positive contribution to the conservation area. The site is also within an Archaeological Priority Area (APA).
- 2.9. The site has excellent public transport connections, defined by Transport for London as having a Public Transport Accessibility Level (PTAL) rating of 6b. Eagle Street is within walking distance of both Holborn and Chancery Lane Underground Stations, served by the Piccadilly and Central lines. There are also a number of Santander Cycles docking stations nearby, including ones on Red Lion Square and Red Lion Street.
- 2.10. The site is served by many nearby buses, the closest of which comprise:
- 8 (Tottenham Court Road to Bow Church);
  - 25 (Oxford Circus to Ilford);
  - 98 (Holborn, *Red Lion Square* to Willesden, *Bus Garage*);
  - 521 (London Bridge to Waterloo);
  - N8 (Oxford Circus Station to Hainault, *The Lowe*); and
  - N98 (Holborn, *Red Lion Square* to Stanmore Station).

Additional bus routes run from other roads within a reasonable proximity of the site.

- 2.11. The Environment Agency's Flood Map for Planning indicates that the site is situated within Flood Zone 1, meaning there is a low probability of a flood event occurring at the site (land having a less than 1 in 1,000 annual probability of river or sea flooding).
- 2.12. There are a number of statutorily listed heritage assets situated within the vicinity of the site (although not visible from the site), the closest of which include:
- Nos. 14-17 Red Lion Square and attached railings – Grade II listed (approximately 40m to the north west); and
  - Summit House and attached railings and wall – Grade II listed (approximately 70m to the west).

### Planning Policy Designations

- 2.13. The site is subject to the following site policy designations:
- Within the Bloomsbury Conservation Area ("CA") – the site is identified as a "Positive Contributor";
  - Within the Central Activities Zone (CAZ);
  - Within Central London Area (Clear Zone Region) CLA;

- Within an Archaeological Priority Area (APA);
- Not statutorily or locally listed;
- Not within a flood risk zone;
- The site is subject to an Article 4 Direction which removes 'permitted development' rights to change the office to residential use and undertake basement excavations; and
- PTAL rating of 6b (Excellent).

## Planning History

- 2.14. The building was previously occupied by an online-based bookshop (trading as 'Folio Society') and was used for their offices. The south-western corner of the building was used for a small element of ancillary A1 retail. The lawful use of the building as Class B1a (office) has been formally confirmed by the Council via a Certificate of Lawfulness issued on 17 November 2016 (ref: 2016/6066/P).
- 2.15. The site's planning history is set out in **Appendix A** of this Statement. In summary, applications from the early to mid-1980s relate to the use of the building as workshops, light industry, design studio and storage. In the early 1990s permission was granted for the rear extensions. The remaining minor applications relate to plant.

## Pre-Application Discussions

- 2.16. Prior to the submission of this planning application, the Applicant has been involved in a number of detailed pre-application discussions with planning and conservation officers at LBC.
- 2.17. Pre-application proposals were submitted and responses from the Council were received. Following the Officer's comments, the design of the development has evolved to address the advice received. The full details of the relevant issues and the evolution of the scheme is set out in the Design and Access Statement. The key points are summarised below.
- 2.18. A pre-application request was submitted to Camden Council on 2 May 2017 outlining the scheme and the key design proposals. The planning officer accompanied members of the design team on a site visit on 31 May 2017, which was followed by an initial pre-application meeting on 13 June 2017.
- 2.19. The planning officer stated that there were no concerns from the Council relating to:
- The creation of amenity spaces as roof terraces;
  - Proposals for alterations to the rear elevation;
  - Replacement of the cornicing details;
  - Alterations to the front gate and addition of a canopy; and
  - The creation of a garden room in the courtyard.
- 2.20. The Council welcomed the proposals to relocate the main entrance to Eagle Street, as it would create an active frontage and aid natural surveillance. The location of the proposed plant was also deemed acceptable, although the Council requested that a noise impact assessment is submitted with the application. Comments received from the Design and

Conservation Area suggested revising the design of the Eagle Street front façade.

- 2.21. A second pre-application meeting was requested and was subsequently held on 12 July 2017, with the conservation officer in attendance. Following detailed discussions, it was suggested that a possible alternative design was to resemble the 'as existing' 1972 elevation. Following this, the Council issued their formal pre-application response, which can be found at **Appendix B** of this Statement.
- 2.22. In response to the comments received by the conservation officer on the design of the Eagle Street frontage, the architects implemented a number of design alterations, which included:
- Cills would be lowered on the outer window bays only, in order to resemble the February 1972 existing elevation;
  - Additional glazing bars have been introduced on the windows to emulate the historic façade;
  - The brick spandrels detail on the central bays are to be retained, together with the reveals which will be painted grey; and
  - Glazed balustrades have been replaced with metal balustrades.
- 2.23. The mechanical plant screening has been reduced and moved away from the front façade, so that it remains unseen from street level.



## 3. The Proposed Development

3.1. This section sets out a summary of the key elements of the proposal. A comprehensive description of the design and layout of the proposals is set out in the accompanying Design and Access Statement.

3.2. The development proposals incorporate four main changes to the existing building, which can be summarised as follows:

- A new main entrance fronting Eagle Street;
- An enhanced front façade;
- New and enhanced external amenity spaces and proposed plant; and
- Courtyard landscaping and the creation of a new garden room.

### **New Entrance**

3.3. The existing entrance to the building is located through the underpass and is off the inner courtyard. As a result, the entrance has no presence or frontage on the street. Additionally, a large proportion of the glazing facing Eagle Street is opaque and covered with advertisements.

3.4. As part of the proposals, it is planned to relocate the main building entrance to the Eagle Street façade, helping to announce the access point into the building. This relocation would be in line with the historical context of the building, as it is likely that either a former entrance or loading bay was also located on this frontage. It is not proposed to modify any of the other openings at ground floor level, with the exception of removing the 1980s crow stepped pediments. The western side of the site, will be used as an 'island' office, will have a new access fronting Eagle Street.

3.5. It is proposed to install a new canopy above the entrance to the reception on Eagle Street. This canopy will feature integrated signage (subject to any necessary, separate advertisement consents in the future) and security lighting. The existing entrance gate to the courtyard is of poor quality painted metal and is of no architectural merit. As such, the development will include the installation of a new gate which will be of a design more suited to the host building.

### **Enhanced Front Façade**

3.6. The existing façade of the building is principally composed of five bays along Eagle Street. The red brick is cohesive with much of the streetscape, and the original detailing along the upper floors, such as the dogtooth corncicing and brick banding, remains intact. However, it is necessary to maintain and clean the window surrounds, and to upgrade the performance specification of the windows themselves.

3.7. The proposal has been designed to work within the proportions of the current façade, and enhances the building by keeping within the established lines of composition. The design seeks to enlarge the openings of the outer bays, which would reinstate some of the

industrial character of the 'as existing' 1972 façade, before alterations were implemented after this. This will provide an increased amount of light to the office space. By retaining the rendered surrounds, this will help to provide consistency across the façade.

- 3.8. At ground floor level, the frontage along Eagle Street will be activated by the full height glazing of the existing openings, and the proposed glazed bricks along the solid walls will recall the building's original detailing, as detailed in Heritage Statement. Greater street presence will be achieved through the introduction of a new main entrance and canopy on Eagle Street. Access to the 'island' office at the western side of the building will be provided with a reinstated entrance from the street. The underpass leading into the courtyard and rear offices will be private, and a new set of gates will be installed which are to be kept shut when not in use.
- 3.9. It is proposed to install signage identifying the building on the new gates and entrance canopy. This will be subject to any necessary separate advertisement consent in the future.
- 3.10. It is necessary as part of the redevelopment works to upgrade the building's existing windows. At ground floor, the existing red aluminium curtain glazing system is to be replaced with a new curtain glazing system incorporating fine-line steel frames. By removing the crow steps, this allows for simpler, full-height glazing to all of the openings. The window frames at this level will be of a black anodised or powder-coat finish.
- 3.11. For the upper floors, the existing steel-frame Crittal windows are to be replaced with steel-frame windows, but retaining the narrow framing profiles which would be an almost identical replacement. The proposed composition of the glazing bars has been designed to give the feel of the historic arrangement of the 44-46 Eagle Street façade. The new windows will be double-glazed to comply with modern Building Regulations standards. As with the ground floor, the frames at the upper levels will be finished in black paint or powder coat.

### **New Amenity Spaces and Proposed Replacement Plant**

- 3.12. At present, the application site features only one usable amenity space: the central courtyard, despite the significant potential for other spaces in the building to provide high quality amenity space. Flat roofs located on the building provide the potential for the implementation of roof terraces as part of the development proposals. To this effect, the scheme seeks to provide two new roof terraces, one at the second floor and one at roof level, both of which will be provided with discrete, low-level lighting.
- 3.13. At the second floor, a roof terrace is proposed to replace the existing pitched asbestos sheet roof. The proposed usable terrace space occupies approximately half of the total roof area, allowing part of the unusable space to accommodate mechanical plant. The setback from the boundary of the property gives a generous distance from the neighbouring residential balconies to avoid any issues of overlooking. The proposed terrace area will be decked, with built-in seating and landscaping, with the unusable section of the terrace laid with a wildflower and sedum mat.
- 3.14. The proposed main roof terrace will also feature useable and unusable space, featuring decking and a wildflower and sedum mat respectively. The terrace space will wrap around

the new acoustic plant enclosure and stair. All apparatus to be installed on this terrace will be set back from the building edge to avoid visibility from the street level and remove any overlooking issues.

- 3.15. The development proposals incorporate the complete replacement of the existing mechanical plant with new equipment that is considerably more energy efficient. In order to ensure that neighbouring users will not be impacted upon from an amenity point of view, a noise survey and assessment has been undertaken to demonstrate that there will not be any adverse impact. The report of this assessment produced by Hann Tucker Associates has been submitted in support of the planning application.

### **Courtyard Landscaping and New Garden Room**

- 3.16. The existing rear courtyard is underutilised, underused and in a poor condition. As such, a central element of the proposals is to significantly enhance this courtyard and make it a focal point of the development. The space will be re-established by introducing new paving, hard and soft landscaping and a garden room.
- 3.17. The garden room will be the most prominent addition to the courtyard space, with a glazed façade used to connect the internal and external spaces. This facility will primarily be used as a meeting room (or for other office-related activities), and feature a self-contained water closet.

## 4. Planning Policy Framework

- 4.1. The redevelopment proposals have taken account of relevant national, regional and local planning policy. This section of the Planning Statement sets out a summary of the relevant planning policy documents and the following section demonstrates compliance with these policies.
- 4.2. In accordance with section 38(6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 4.3. The development plan in this case comprises:
- The London Plan (2015 consolidated with alterations since 2011) and minor alterations to the London Plan (2016);
  - Camden Local Plan (July 2017); and
  - Camden Site Allocations Document (2013).
- 4.4. The development plan is supported by other material considerations including the National Planning Policy Framework (NPPF) and associated guidance contained within the Planning Practice Guidance (PPG) relevant Supplementary Planning Documents/Guidance (SPDs/SPGs) produced by LBC.

### National Planning Policy Framework

- 4.5. At the national level, the Government published its National Planning Policy Framework (NPPF) on 27 March 2012. The NPPF provides an overarching framework for the production of local policy documents. At the heart of the NPPF is a presumption in favour of sustainable development. In accordance with the NPPF, this should be seen as a 'golden thread' running through both plan-making and decision-taking.
- 4.6. Within the NPPF is a set of twelve core land-use planning principles, which should underpin plan-making and decision-taking, and which planning should achieve. In accordance with Paragraph 14 of the NPPF, for decision-taking, this means:
- approving development proposals that accord with the development plan without delay; and
  - where the development plan is absent, silent or where relevant policies are out-of-date, granting planning permission unless:
    - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole;
    - or
    - specific policies in the NPPF indicate development should be restricted.
- 4.7. The NPPF sets out that the Government expects the planning system to deliver homes, businesses and infrastructure, and to improve local places whilst at the same time protecting and enhancing the natural and historic environment.

- 4.8. Paragraph 15 highlights that Local Plan policies should follow the approach of the presumption of sustainable development, whilst Paragraph 197 confirms that the presumption needs to be applied to the decision-making process.
- 4.9. The NPPF sets out that the Government expects the planning system to contribute to building a strong, responsive and competitive economy (paragraph 18). The Government is committed to securing economic growth in order to create jobs and prosperity and therefore significant weight should be placed on the need to support sustainable economic growth through the planning system (paragraph 19).
- 4.10. The NPPF sets out that the Government expects the planning system to deliver homes, businesses, and infrastructure and to improve local places whilst at the same time protecting and enhancing the natural and historic environment. Paragraph 17 sets out that the planning system should *‘proactively drive and support sustainable development to deliver the new homes, business and industrial units, infrastructure and thriving local places that the country needs’*.
- 4.11. The NPPF defines “heritage asset” as the following:
- “A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).”*
- 4.12. The NPPF requires proposals to ‘conserve heritage assets in a manner appropriate to their significance.’ Paragraph 128 of the NPPF requires the assessment of the impact of any heritage assets affected by development proposals and Paragraph 132 further states:
- ‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be.’*
- 4.13. Paragraph 136 of the NPPF states that Local Authorities should look for opportunities for new development within Conservation Areas and the setting of heritage assets to enhance their significance.
- 4.14. Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. 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 its optimum viable use.
- 4.15. The NPPF identifies a need for the planning system to contribute towards minimising *“...vulnerability and providing resilience to the impacts of climate change.”*
- 4.16. Paragraph 56 promotes good design and affords it *“great importance”* in the delivery of the built environment. This is furthered by Paragraph 57, which states *“it is important to plan*

*positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes". This places an emphasis on encouraging sustainable transport modes and providing people with a genuine choice of how they travel.*

## **The London Plan (2016)**

- 4.17. The London Plan (2016) is the overall strategic plan for London, and sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. The most recent version has been consolidated with alterations since 2011 and includes the Minor Alterations to the London Plan (2016).
- 4.18. London Plan Policy 1.1 sets out that growth will be supported across all parts of London to ensure it addresses the need for development, regeneration and social and economic convergence.

### **Office**

- 4.19. London Plan Policy 2.10 is an overarching policy to enhance and promote the functions of the Central Activities Zone (CAZ) in London, while Policy 2.11 ensures that development proposals increase office floorspace in the CAZ.
- 4.20. Policy 4.2 of the London Plan supports the redevelopment of office provision to ensure London's competitiveness and meet the distinct need of central London office market. The policy also encourages the renewal and modernisation of existing office stock.

### **Design and Heritage**

- 4.21. London Plan policy encourages new developments to maximise the potential of development sites, be accessible and permeable to all users, be safe and sustainable, respect the local context and communities, and to be inspiring, exciting, practical and legible. Policy 7.1 seeks development which interfaces with the surrounding land and allows people to be connected to social infrastructure, community infrastructure, employment opportunities and transport connections.
- 4.22. London Plan Policy 7.2 seeks inclusivity and accessibility in development to ensure that development proposals are inclusive and accessible for all users regardless of age, gender, mobility, ethnicity and economic circumstances.
- 4.23. London Plan Policy 7.3 considers designing out crime. Policy 7.4 concerns respect for the local context in terms of form, function and structure of the area. Policy 7.6 relates to architecture and seeks the highest quality of urban design, which positively contributes to the public realm.
- 4.24. London Plan Policy 7.8 Heritage Assets and Archaeology is of relevance as it seeks to ensure heritage assets are safeguarded. The policy encourages development that (i) identifies, values, conserves, restores, re-uses and incorporates heritage assets, where appropriate, and (ii) conserves heritage assets and their setting.

## Transport

- 4.25. The Mayor's overall strategic vision is to encourage development to reduce car borne travel, improve accessibility to public transport, promote walking and cycling, improve transport interchanges and support development that generates high levels of trips at locations with good public transport accessibility levels.
- 4.26. London Plan Policy 6.1 sets out the Mayor's parking strategy and states that boroughs should encourage access by sustainable means of transport. Policy 6.3 considers proposals for development in terms of existing transport capacity.
- 4.27. Policy 6.9 relates to cycling and states that Mayor will work with strategic partners to bring about a significant increase in cycling. Table 6.3 in the London Plan sets out cycle parking standards.

## Sustainability

- 4.28. A general thrust of the London Plan is to promote sustainable development. Policy 5.2 requires developments to make the fullest contribution to the mitigation of and adaptation to climate change in accordance with the following energy hierarchy:
- Be Lean: use less energy;
  - Be Clean: supply energy efficiently; and
  - Be Green: use renewable energy.
- 4.29. London Policy 5.3 seeks to ensure that future developments meet the highest standards of sustainable design and construction. Policy 5.7 encourages energy efficiency and the use of renewable energy technologies in order to help meet the Mayoral carbon emission reduction targets.

## London Borough of Camden – Local Plan (2017)

- 4.30. It is necessary to consider LBC's Local Plan which was recently adopted in July 2017. It sets out the Borough's long-term strategic vision and detailed planning policies up to 2031, in line with the principles of sustainable development.
- 4.31. Policy G1 (Delivery and location of growth) outlines the Council's desire to create the suitable conditions needed for growth in Camden, which will deliver the homes, jobs and infrastructure needed by those who live and work in the Borough. Growth in Camden will contribute towards achieving the strategic objectives set out in the Local Plan, which includes the provision of 16,800 additional homes, 695,000sqm of office floorspace and circa 30,000sqm of retail floorspace. Development will occur across the Borough, but the most significant growth is expected to take place in Camden's growth areas, which includes Holborn.



## Offices

- 4.32. Policy E1 (Economic development) seeks to secure a successful and inclusive economy in Camden, stating that the Council will create the conditions necessary for economic growth, and harness the benefits for local residents and businesses.
- 4.33. Furthermore, Policy E2 (Employment premises and sites) states that the Council will be supportive of proposals which seek to provide employment floorspace within Camden. Premises which are suitable for continued business use should be retained as such, in particular those which cater to small businesses, businesses which provide employment opportunities for local residents, and those which support the operational needs of the CAZ or local economy.

## Design, Heritage and Accessibility

- 4.34. Policy D1 (Design) seeks to ensure that development is of the highest quality design, and states that the Council will resist development of poor design that does not take advantage of opportunities to improve the quality and character of an area and the way that it functions.
- 4.35. Policy D2 (Heritage) states that Camden will seek to preserve, and where appropriate, enhance the Borough's rich and diverse heritage assets and their settings, including conservation areas. In order to maintain the character and appearance of these conservation areas, Camden will take account of conservation area statements, appraisals and management strategies when assessing planning applications within such areas.
- 4.36. It is the intention of Camden to make the Borough a safer place. Policy C5 (Safety and security) states that the Council will require development proposals to demonstrate that design principles have been incorporated which contribute to community safety and security. Proposals should ensure that appropriate security measures have been integrated into developments, as well as promote safer streets and public areas.
- 4.37. Policy C6 (Access for all) states that the Council will promote fair access and remove barriers which prevent everyone from accessing facilities and opportunities. Development proposals should incorporate inclusive design measures to improve access for all, ensuring that spaces, routes and facilities between buildings are fully accessible.

## Transport

- 4.38. Policy T1 (Prioritising walking, cycling and public transport) states that Camden will promote sustainable travel across the Borough by prioritising walking, cycling and the use of public transport. The Council will seek that development proposals include a number of provisions to ensure this sustainable objective is met.
- 4.39. In an effort to further encourage sustainable travel in Camden, Policy T2 (Parking and car-free development) states that the Council will require all new developments within the Borough to be car-free and will limit the availability of parking. To this effect, any on-site parking provision will be limited to disabled spaces or essential operational or servicing needs, and on-street parking permits in connection with new developments will not be



issued.

## **Sustainability**

- 4.40. Policy CC1 (Climate change mitigation) requires all development proposals to minimise the effects of climate change, and encourages all developments to meet the highest feasible environmental standards which are financially viable at both the construction and occupation phases of development.
- 4.41. Policy CC2 (Adapting to climate change) states that all proposals should be resilient to climate change, and adopt a range of climate change adaptation measures, including sustainable design and construction measures.
- 4.42. Policy CC5 (Waste) states Camden's intention to make itself a low waste borough. For development proposals, it will achieve this by ensuring that schemes incorporate facilities for the storage and collection of waste and recycling.

## **Amenity**

- 4.43. Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours, and development proposals will not be granted planning permission should there be unacceptable harm to amenity. Mitigation measures will be required by the Council where necessary, and Camden will assess proposals on a number of amenity considerations, including visual privacy, daylight/overshadowing, transport impacts and impacts of the construction phase.
- 4.44. Policy A3 (Biodiversity) states that the Council will seek the protection and enhancement of sites of nature conservation and biodiversity. Camden will also protect and seek to secure the provision of additional trees and vegetation across the Borough.
- 4.45. Policy A4 (Noise and vibration) seeks to ensure that noise and vibration across the Borough is managed appropriately. As such, development proposals must have regard to Camden's Noise and Vibration Thresholds, and will not grant planning permission for developments which are likely to generate unacceptable noise and vibration impacts, or those which would be particularly sensitive to noise in locations which already experience high levels of noise.

## **London Borough of Camden – Relevant Supplementary Planning Documents**

- 4.46. LBC have a number of supplementary planning documents (SPDs) which are of particular relevance to this application. They include:
- Camden Planning Guidance 1: Design (July 2015);
  - Camden Planning Guidance 3: Sustainability (July 2015);
  - Camden Planning Guidance 5: Town centres, retail and employment (September 2013);
  - Camden Planning Guidance 6: Amenity (2011);
  - Camden Planning Guidance 7: Transport (2011);
  - Camden Planning Guidance 8: Planning obligations (July 2015); and

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- Bloomsbury Conservation Area Appraisal and Management Strategy (2011).

4.47. The above guidance will be used alongside the national, regional and other local policies set out above to highlight the schemes compliance with all relevant policy.

## 5. Planning Assessment

- 5.1. This section assesses the proposals against the national, regional and local planning policy framework.

### Principle of Development

- 5.2. A presumption in favour of sustainable development is identified as the basis for every plan and every decision in the NPPF. The London Plan Policy 1.1 sets out that growth will be supported across all parts of London to ensure it addresses the need for development, regeneration and social and economic convergence.
- 5.3. The general thrust of national, regional and local policies is to secure sustainable patterns of development and re-use previously developed ('brownfield') urban land. A presumption in favour of development accords with the core themes in the NPPF, which reflects Government thinking in relation to the determination of planning applications.
- 5.4. London Plan Policy 2.10 is an overarching policy to enhance and promote the functions of the Central Activities Zone (CAZ) in London, while Policy 2.11 ensures that development proposals increase office floorspace in the CAZ.
- 5.5. London Plan Policy 4.2 supports the redevelopment of office provision to ensure London's competitiveness and meet the distinct need of central London office market. The policy also encourages the renewal and modernisation of the existing office stock of the London Plan.
- 5.6. Policy G1 (Delivery and location of growth) outlines the Council's desire to create the suitable conditions needed for growth in the Borough, which will deliver the homes, jobs and infrastructure needed by those who live and work in the Borough. Growth in Camden will contribute towards achieving the strategic objectives set out in the Local Plan, which includes the provision of 16,800 additional homes, 695,000sqm of office floorspace and circa 30,000sqm of retail floorspace. Development will occur across the Borough, but the most significant growth is expected to take place in Camden's growth areas, which includes Holborn.
- 5.7. Policy E1 (Economic development) seeks to secure a successful and inclusive economy in Camden, stating that the Council will be creating the conditions for economic growth and harnessing the benefits for local residents and businesses.
- 5.8. Policy E2 (Employment premises and sites) states that the Council will be supportive of proposals which seek to provide employment floorspace within Camden. Premises which are suitable for continued business use should be retained as such, in particular those which cater to small businesses, businesses which provide employment opportunities for local residents, and those which support the operational needs of the CAZ or local economy.
- 5.9. A Certificate of Lawfulness was issued by Camden in November 2016, which confirms the Council's position that the building's lawful use is for offices (Class B1a). The principle of office use has therefore been established and is formally recognised by the Council.

# Planning Statement

44-46 Eagle Street, Holborn

The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored in a dark red or maroon hue. It is positioned in the top right corner of the page, partially overlapping a yellow rectangular background element.

- 5.10. The application proposals provide an opportunity to retain and enhance the existing office accommodation, while keeping the usable office space at largely the same quantum (a minor reduction of 13sqm is proposed).
- 5.11. The site lies within the Central Activities Zone, where the proposals would support and enhance this competitive business location. Fundamentally, the proposals would modernise and enhance the existing office floorspace which would fully comply with point c) of London Plan Policy 4.2.
- 5.12. At present, the site comprises 1,399sqm of B1a office floorspace. As part of the development, the proposals seek marginally to reduce this by 13sqm. This is not considered unacceptable, as this is mostly due to the loss of 76sqm of unusable floorspace at mezzanine level. There would then be the provision of new office floorspace through the creation of the garden room within the courtyard (33sqm), and an additional provision of 10sqm at ground, first and second floor levels.
- 5.13. The existing internal layout of the office building is currently awkward, constrained and inflexible. It is also compromised by the number of internal circulation spaces. The Design Team have approached the existing building and proposed refurbishment works in a holistic manner. The proposed internal alterations to the existing building seek to reconfigure the office floorspace, enabling the building to be used more flexibly for a range of future business occupiers.
- 5.14. The pre-application response letter received from LBC indicated the Council's support for maintaining economic development in the area, especially in relation to medium to smaller sized firms and start-ups. The Council requested the submission of details regarding the types of business which would be most attracted to the development once completed. As such, a Statement from Savills Central London Leasing has been submitted in support of the application at **Appendix C** of this Statement.
- 5.15. The Statement confirms that the likely occupiers of the building would be companies from the media and creative sectors, many of whom are Small to Medium Enterprises. There is expected to be interest from industries such as graphic designers, advertising agencies and architects, who would find the style of the proposed development especially appealing.
- 5.16. As such, it is considered that the proposal would fully comply with Policies E1 and E2 because the development is maintaining a stock of premises that are suitable for a variety of business activities, for forms of differing sizes and available on a range of terms.
- 5.17. In respect of the ancillary retail 'island' area, it is understood this was previously used in association with the existing offices and used by the former occupier, the Folio Society. Given the ancillary nature, it is considered the use of this 'island' for office purposes would also comply with the adopted policies which seek to maintain a stock of premises that are suitable for a variety of business activities.

## Amenity

- 5.18. Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours, and development proposals will not be granted planning permission should there be unacceptable harm to amenity. Mitigation measures will be required by the Council where necessary, and Camden will assess proposals on a number of amenity considerations, including visual privacy, daylight/overshadowing, transport impacts and impacts of the construction phase.
- 5.19. Policy A4 (Noise and vibration) seeks to ensure that noise and vibration across the Borough is managed appropriately. As such, development proposals must have regard to Camden's Noise and Vibration Thresholds, and will not grant planning permission for developments which are likely to generate unacceptable noise and vibration impacts, or those which would be particularly sensitive to noise in locations which already experience high levels of noise.
- 5.20. In addition to the existing rear external courtyard, there is the opportunity to provide additional outdoor external space for future officer occupiers in the form of terraces. The particular circumstances of the site, its locality and immediate context have been taken into account.
- 5.21. It is considered that there is already an established degree of overlooking at the rear of the site and surrounding properties. This is because there are numerous balconies at residential properties, including 18 Red Lion Square (north of the site) and the decks along 47-51 Eagle Street (adjacent to the site to the west). There is also a degree of existing activity at the rear part of this urban block including car parking and local 'through' pedestrian walking routes.
- 5.22. The proposed terraces would be set back from the parapet walls. Discreet screening and carefully positioned balustrading would ensure that neighbouring residential occupiers would not be adversely overlooked. In any event, there is a significant separation distance of nearly 20 metres between the northern, residential properties and the edge of the proposed second floor terrace, as illustrated in the proposed Section B-B drawing. This separation distance would be significantly increased at the terrace located at roof level.
- 5.23. The nearest residential window is located on the rear top floor at 47-51 Eagle Street which faces onto a deck, and is located perpendicular to the boundary wall shared with the application site. Due to the positioning of the proposed flank security screening along the boundary wall, and the setback nature of the terrace from the boundary wall and the rear parapet of the application site, there would be no opportunities to overlook the neighbouring residential window, and therefore no loss of privacy for the neighbouring occupier.
- 5.24. To ensure that the amenity of the site's neighbouring users is maintained during the construction phase of the development, the Applicant is happy to accept a planning condition a Construction Management Plan (CMP). This would set out the safeguards to be put in place for the protection and mitigation of the amenity of the nearby occupiers, and would therefore comply with Policy A1.
- 5.25. An Environmental Noise Survey and Plant Noise Assessment Report has been prepared by Hann Tucker Associates and is submitted in support of the planning application. The report

concludes that the proposed plant would exceed the requirements of Camden in terms of acceptable noise levels at the nearest residential window. As such, it is recommended that the plant is enclosed in acoustic screening which would provide no less than a reduction of 11 dBA. With this in place, the development proposals would meet the Council's requirements and fully comply with Policy A4.

- 5.26. We consider the proposals would fully comply with Policies A1 and A4 which require development to take into account and manage the impact of development on the amenities of neighbouring occupiers, and protect the quality of life of local communities.

### **Design, Heritage and Accessibility**

- 5.27. The Design and Access Statement, Section 3 of this Planning Statement and the submitted drawings set out the full extent of the proposed works to this building which facilitate the office refurbishment. As the building has been identified as a positive contributor within the Bloomsbury Conservation Area, the proposed works which maintains its lawful office use have been sensitively designed.
- 5.28. A Heritage Statement (HS) has been prepared by JLL Heritage and submitted in support of the proposals. The HS identifies the heritage assets and provides an assessment of the application proposal on the significant of the identified heritage asset based on national, regional and local planning guidance. The HS concludes that the alterations, including the external facade changes, would enhance the historic character of the building and in turn will enhance its contribution to the character and appearance of the Bloomsbury Conservation Area.
- 5.29. One of the key issues raised during pre-application discussions was the façade alterations fronting Eagle Street. As such, the design and detailed design has evolved in response to LBC comments.
- 5.30. The HS sets how the building has been the subject of significant external alteration, particularly in the late twentieth century which has greatly diluted its former industrial character. As the building currently exists, the result of the piecemeal changes, including the 1980s alterations, has led to a more commercial appearance of the building, including modern metal windows in the upper floors, poor quality render at ground floor and modern red metal windows of a rather incongruous design. LBC pre-application letter did not raise any objections in respect of the removal of the modern ground floor elements, stating that *“detailing at ground floor level such as the crow steps and red metal finishes are recent and are considered of no significant value in terms of design and appearance”*.
- 5.31. In line with the Council's pre-application letter (see **Appendix B**), it is proposed for the front facade to have a resemblance to its appearance in February 1972, as evidenced by LBC's planning files, reference 13040. This 'as existing' drawing is shown in Figure 13 of the HS, and for ease of reference it has been extracted and shown as follows:



Figure 13: Existing plan of the front elevation of nos. 44-46 Eagle Street, February 1972 (planning ref. 13040, Camden Council website)

**Illustration 5.1: Extract of Figure 13 from Heritage Statement, prepared by JLL Heritage**

- 5.32. The HS also exhibits an historic photograph showing an oblique view of part of the building from 1941. It shows the building with glazed bricks and a ‘chest height’ plinth. For ease of reference, this photograph has been extracted from Figure 12 of the HS and is show below, with the application site on the right hand side of the photograph:



Figure 12: View of Eagle Street from nos. 44-46 on 13<sup>th</sup> May 1941 (site located to the right, Camden Archives)

**Photo 5.1: Extract of Figure 12 from Heritage Statement, prepared by JLL Heritage**

- 5.33. Section 4 of the HS sets out a detailed assessment in heritage terms of the proposal and should be read in its full context. In summary, the proposed enlarged windows in the outer bays resemble the historic size of openings and is appropriate in heritage and design terms, together with the retention of the window openings in the inner bays of the upper floor windows. Whilst recent, brief comments from the Design and Conservation officer (received on 14 September 2017) raised concerns of the full height glazing of the ground floor treatment due to it clashing with the rest of the building, the proposed design would in fact



retain the original form of the ground floor openings, with the ground floor red metal frames and crow steps removed. Whilst the Conservation Officer also referred to shop front guidance, the proposal is not in the context of ground floor shop of a shop front and therefore not applicable. Rather, the frontage should be considered in the context of an entrance and frontage to an office building, and therefore should be assessed against Policy D1 as elaborated below.

- 5.34. Furthermore, as confirmed by the Council, the 1980s additions are not considered to have significant value in terms of their design and appearance. An entrance to the offices would therefore be reinstated below a modest canopy with simple glazed door openings with modern sheet glass set within simple metal frames, with a single transom to break up the expanse of glazing. The proposal seeks to introduce a contemporary interpretation of the historic facade treatment at ground floor, maintain a sense of the facade's integrity and bring it up to modern day standards. The use of grey and white glazed bricks would also assist in visually binding the ground and upper floors.
- 5.35. Officers accepted the principle of re-locating the office entrance to the front of the building. In planning policy terms, Part (f) of Local Policy D1 (Design) requires that development contributes positively to the street frontage. Local Plan paragraph 7.11 goes on to explain that building facades should be designed to provide active fronts and respond positively to the street. As it relates to this proposal, the Local Plan states that positive factors for frontages includes entrances and windows. As such, the proposal retains the existing full height windows and allows views into the building, providing natural street, safety surveillance and provide an active frontage appropriate for this office building, thereby fully complying with Local Policy D1.
- 5.36. For the detailed reasoning and justification set out in the HS, it is considered that the proposed front facade treatment would fully comply with Local Policy D2 (Heritage) which seeks to preserve and enhance Camden's rich and diverse heritage assets and their settings. The proposal would also comply with Local Policy D1 (Design) which seeks to secure high quality design in development that respect local context and character, preserves and enhances the historic environment and heritage assets.
- 5.37. The remainder of the proposed works are located at the rear and roof of the building. The rear elevation makes a lesser contribution to the conservation area as it is predominantly visible from private views. It is considered that the removal of the unattractive asbestos rear roof and its roof replacement with terrace above, together with the construction of a 'garden room' and rear courtyard enhancement would significantly improve the appearance of this part of the building and its office function. This would fully comply with Local Policy D1 which seeks to secure high quality design in development.
- 5.38. In particular, the rear courtyard and roof terraces include high quality landscape design and therefore fully comply with part (k) of Local Policy D1 (Design). The provision of roof terraces incorporates outdoor amenity space, to be used in association with the lawful office and fully comply with part (l) of Policy D1. The proposed replacement of the plant at roof and second floor and the associated screening would fully comply with part (o) of Policy D1 because these building services equipment have been carefully integrated into the building.



5.39. Measures to incorporate the safety of the building's occupiers have also been integrated into the design of the development. This includes the replacement of the security gate on the Eagle Street elevation, which will be kept securely shut and locked when appropriate. The proposed canopy over the public footpath will also include subtle lighting to illuminate this part of the street. It would therefore fully comply with part (i) of Policy D1 which seeks for development to be secure and be designed to minimise crime. It would also fully accord with the aspirations of Camden to make the Borough a safer place. The proposal fully complies with Policy C5 (Safety and security) which requires proposals to include appropriate security measures be integrated into developments.

5.40. The scheme has also been designed with accessibility considerations in mind. The reconfiguration of the office space will remove the various small level changes throughout the building, and the replacement of the lift will provide step-free access to all levels. This provision of accessibility would fully accord with Policy C6 (Access for All), which requires development proposals to incorporate inclusive design measures, thereby improving access for all.

### *Design and Heritage Summary*

5.41. Overall, it is considered that the proposals fully comply with Policies D1 and D2 as it is of the highest quality design and improves the quality and character of the local area, as well as preserving and enhancing the appearance and character of the building (which is a 'positive contributor') and Bloomsbury Conservation Area. It would also fully comply with the design and heritage objectives of the London Plan and NPPF.

5.42. Paragraphs 128 and 129 of the NPPF require a description of the significance of any heritage assets affected. As such, a Heritage Statement has been submitted. Section 3 describes the significance of the heritage assets.

5.43. In the event that the Conservation Officer considers the proposals would be harmful to the character and appearance of the Bloomsbury Conservation Area and non-designated heritage assets, the NPPF makes it clear that, in the case of designated heritage assets, any harm must be quantified as 'substantial' or 'less than substantial'.

5.44. We do not consider that the proposals are harmful to the Conservation Area or non-designated heritage assets. However, if LBC consider the proposals are harmful, they would be said to be 'less than substantial harm' to the character and appearance of the Bloomsbury Conservation Area. It would therefore require, in accordance with paragraph 134, the identification of public benefits to outweigh this harm.

5.45. In the case of the non-designated heritage asset, the NPPF, at paragraph 135, notes that a balanced judgement is required taking into account the scale, nature and effect of the proposals.

5.46. Both paragraphs 134 and 135, as clarified through appeal and case law, set out the steps to be undertaken in the balancing exercise and notes that after quantifying the level of harm, the public benefits of the proposal should be identified and a planning judgement formed.

- 5.47. It is considered that the planning benefits outweighs any potential harm to the appearance of the building and character and appearance of the conservation area.

### **Transport, Access and Servicing**

- 5.48. National, regional and local policy promotes the utilisation of sustainable transport modes, such as public transport, walking and cycling. The NPPF and Policy 6.1 of the London Plan both seek to promote public transport usage and minimise the use of private vehicles, thus promoting developments in areas with high public transport accessibility.
- 5.49. Policy T1 (Prioritising walking, cycling and public transport) states that Camden will promote sustainable travel across the Borough by prioritising walking, cycling and the use of public transport. The Council will seek that development proposals include a number of provisions to ensure this sustainable objective is met.
- 5.50. In an effort to further encourage sustainable travel in Camden, Policy T2 (Parking and car-free development) states that the Council will require all new developments within the Borough to be car-free and will limit the availability of parking. To this effect, any on-site parking provision will be limited to disabled spaces or essential operational or servicing needs, and on-street parking permits in connection with new developments will not be issued.
- 5.51. The proposed improvements to the rear courtyard would result in the loss of the ad hoc vehicle parking in the courtyard. However, Policy T2 targets car-free schemes for non-residential proposals in locations with a high level of accessibility. In view of the site having the highest PTAL level of 6b, it is considered that the loss of the ad hoc parking would meet the policy's criteria, and therefore encourage more sustainable forms of transport to and from the site.
- 5.52. Notwithstanding this, the enhanced courtyard would still have the capability to provide some form of ad hoc parking, for example for motorbikes, due to the retention of the existing vehicle access.
- 5.53. It is proposed that 10 no. secure double stacked cycle spaces are provided at basement level, together with showering facilities, storage lockers, and a bike pump. The provision of these facilities is considered to accord with the objectives of Policies T1 and T2, which seek to promote sustainable travel by requiring the provision of cycling facilities. As the existing building does not currently feature any such facilities, this is considered to be a significant planning benefit of the proposed development.
- 5.54. The site would continue with its current servicing/refuse arrangements which are already integrated with the immediate local road network.

### **Archaeology**

- 5.55. The NPPF states that where a site on which development is proposed "includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where

necessary, a field evaluation”.

- 5.56. Regional guidance related to archaeology is stated in Policy 7.8, which outlines that development proposals should incorporate measures which identify, record, interpret, protect and, where appropriate, present the site’s archaeology.
- 5.57. Camden Local Plan Policy D2 specifically refers to archaeology, stating that Camden will protect the Borough’s remains of archaeological importance by ensuring that appropriate measures are taken to preserve them and their setting, including physical preservation, where appropriate.
- 5.58. As the site is within an Archaeological Priority Area (APA), an Archaeological Desk Based Assessment has been prepared by CgMs and has been submitted in support of the planning application.
- 5.59. The report concludes that it is likely that the study site has moderate archaeological potential for the Palaeolithic and Roman periods, and a generally low archaeological potential for other periods of past human activity. Past post depositional impacts within the site are considered likely to have had a severe negative archaeological impact.
- 5.60. It is anticipated that given the site’s location within the Camden APA, the Greater London Archaeological Advisory Service officer for Camden will likely require additional mitigation measures associated with the development proposals. The applicant is happy for these to be conditioned accordingly. Thus it is considered that the development fully accords with Policy D2 in respect of archaeology.

## Sustainability

- 5.61. The NPPF and London Plan encourage local planning authorities to adopt proactive strategies to mitigate and adapt to climate change.
- 5.62. Local Policy CC1 states that all development proposals must minimise the effects of climate change, and encourages all developments to meet the highest feasible environmental standards which are financially viable at both the construction and occupation phases of development.
- 5.63. Policy CC2 (Adapting to climate change) requires all proposals to be resilient to climate change, and adopt a range of climate change adaptation measures, including sustainable design and construction measures.
- 5.64. Given the nature and scale of the development proposals, it is not considered that a sustainability or energy statement is required to be submitted in support of the planning application, as confirmed in Camden’s Pre-App Letter dated 1 August 2017. Notwithstanding this, a number of measures to ensure the development is sustainable have been included within the scheme design, including:
- **Windows:** the existing single glazed windows will be replaced with new metal windows which incorporate low iron double glazing;

- **Roofs:** all new roof sections will be insulated in accordance with modern Building Regulations standards (Approved Document L1B);
  - **Plant:** existing equipment will be entirely replaced with modern energy efficient plant; and
  - **Materials:** timber sourced for the development will be FSC sustainably sourced where possible.
- 5.65. Policy A3 (Biodiversity) states that the Council will seek the protection and enhancement of sites of nature conservation and biodiversity. Camden will also protect and seek to secure the provision of additional trees and vegetation across the Borough.
- 5.66. The proposals have been designed to incorporate measures which will support local biodiversity. Sedum roofs have been specified at all levels, which reduces surface water but also promotes biodiversity. Wildlife-friendly plantings across the site will enhance the ecology of the development and support biodiversity in the wider urban context, therefore complying with Policy A3.
- 5.67. There is not expected to be a significant increase in emissions as a result of the development during the building's operational phase. However, during the construction of the development, it is expected that dust and air pollution levels may increase. To mitigate and ameliorate the air quality impacts of the construction works on neighbouring residents and users, the applicant is happy to accept a construction management plan as part of a condition post-consent.
- 5.68. A dedicated refuse storage area has been incorporated into the design of the building, located on the lower ground floor area. Waste capacity is as existing, and is considered to be of a sufficient capacity to meet the operational needs of the building and its occupiers. Policy CC5 is therefore complied with, which requires that schemes incorporate facilities for the storage and collection of waste and recycling.

### Planning Obligations

- 5.69. The Community Infrastructure Levy (CIL) Regulations at Regulation 122 provide limitations on the use of planning obligations. Planning obligations may only be sought where they meet all of the following tests:
- necessary to make the development acceptable in planning terms;
  - directly related to the development; and
  - fairly and reasonably related in scale and kind to the development.
- 5.70. These tests are further reinforced at Paragraph 204 of the NPPF.
- 5.71. The NPPG recognises that any planning obligations must be fully justified and evidenced and should not prevent development going forward.
- 5.72. In view of the small scale of the development, it is not considered it triggers any Section 106 planning obligations.

# Planning Statement

44-46 Eagle Street, Holborn

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- 5.73. Notwithstanding the Council's pre-application letter (see **Appendix B**), it is considered that it is proportionate and reasonable to secure a CMP via a planning condition. A planning condition could also secure any reasonable contributions to cover the cost of review, monitoring and enforcing the CMP.
- 5.74. CIL Regulations do not require CIL monies to be paid on development proposals where the gross increase in floor space is 100 sqm or less. As the proposals for 44-46 Eagle Street do not create additional GIA floorspace, the applicant is exempt from paying CIL.

## 6. Conclusions

6.1. This Planning Statement has been prepared in support of a planning application for full planning permission, submitted to the London Borough of Camden on behalf of AFT Properties Ltd.

6.2. This application seeks permission for:

*“Refurbishment of existing office floorspace and associated external works, including fenestration alterations, creation of a small rear garden office room, formation of external roof terraces, plant and associated works.”*

6.3. The proposals have been developed following positive pre-application discussions, which have informed the overall design of the scheme.

6.4. Overall, in land use terms, it is considered that the continued office use of the proposals is the most appropriate form of development for the application site. It reflects the presence of the application site within its central London location and its location within the CAZ.

6.5. The development proposals have regard for the site’s location within the Bloomsbury Conservation Area, and have been designed to preserve and enhance the character and setting of the conservation area and neighbouring buildings.

6.6. The benefits of the proposed scheme are summarised as follows:

- A significant improvement in the standard, layout and functioning of the existing office accommodation, contributing to Camden’s high quality office stock;
- Increase in office economic development within Holborn, especially for future business occupiers, including SMEs;
- Transformation of existing under-used rear courtyard into a high quality focal point for the development, including the creation of a garden room;
- Creation and enhancement of new high quality external amenity spaces for future office occupiers;
- The highest standard of design and preservation and enhancements of heritage and non-heritage assets, including the Bloomsbury Conservation Area;
- Sustainable transportation encouraged through loss/reduction of ad hoc vehicle parking in the rear courtyard, and addition of internal, secure cycle spaces/ associated facilities including showers;
- Significant improvements in safety and natural surveillance, including re-location of entrance to front of building and lighting;
- Contribution to Borough’s waste reduction targets through improved and dedicated internal refuse and recycling areas;
- Energy and sustainability benefits through use of modern, sustainable materials, better insulation and energy-efficient replacement plant;
- Landscaping and biodiversity benefits through the provision of green roofs, on-site landscaping/green infrastructure; and

# Planning Statement

44-46 Eagle Street, Holborn

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- An improvement in the overall appearance of the building;
- 6.7. This Planning Statement has also summarised the conclusions of supporting reports relating to heritage, archaeology and noise.
- 6.8. The proposal accords with national, regional and local planning policy and would provide many positive benefits to the local area and the Borough. Accordingly, we respectfully request that planning permission is granted.

## Appendix A: Planning History



# Planning Statement

44-46 Eagle Street, Holborn

Application Number	Site Address	Development Description	Status	Date Registered	Decision
2016/6066/P	44-46 Eagle Street London WC1R 4FS	Certificate of lawfulness for existing use of the building as class B1a (office).	FINAL DECISION	14-11-2016	Granted
PS9904082	44 Eagle Street, WC1	Installation of 2 additional condensers on roof of building, as shown by drawing number 65331/PH2/PL01.	FINAL DECISION	28-01-1999	Grant Full Planning Permission (conditions)
PS9804286	44 Eagle Street, WC1	Replacement of existing 4 roof mounted condensers for air conditioning with 8 new roof mounted air conditioning condensers. (as shown on drawing no. 65331/PL-01)	FINAL DECISION	02-04-1998	Grant Full Planning Permission (conditions)
9000532	44-46 Eagle Street WC1	Change of use to use within Class B1 of the Town and Country Planning Use Classes Order 1987 and the erection of 2nd 3rd floor rear extensions and a roof extension to be used for Class B1 purposes as an amendment to planning permission granted by letter dated 9th February 1990 (Reg.No.PL/8900337/R1) for mixed office/showroom use.	FINAL DECISION	12-11-1990	Grant Full or Outline Planning Permission
8900337	44-46 Eagle Street WC1	Change of use to showroom and office use and the erection of a second and third floor rear extension and a fourth floor as shown on drawing numbers 251/101P - 107P revised by letter dated 11th January 1990.	FINAL DECISION	10-07-1989	Grant Full or Outline Perm. with Condit.
8500581	44-46 Eagle Street WC1	Alterations to front elevation and erection of lift motor room at roof level. (As shown on drawing nos: 145/02C 06B 08 10B & 15B).	FINAL DECISION	03-04-1985	Grant Full or Outline Perm. with Condit.
8401352	44-46 Eagle Street WC1	Change of use to office design studio light industry and storage use.	FINAL DECISION	03-08-1984	Grant Full or Outline Perm. with Condit.
8400200	44-46 Eagle Street WC1	Change of use from light industry to residential light industrial design studios and offices.	FINAL DECISION	30-01-1984	Refuse Full or Outline Permission
33856	44-46 Eagle Street, WC1	Change of use of the building from workshop and stores to offices on the ground, 1st, 2nd and 3rd floors and storage in the basement.	APPEAL DECIDED	26-02-1982	Refusal
33855	44-46 Eagle Street, WC1.	Change of use of the building from workshops and stores to offices on part of the ground and all of the 1st, 2nd and 3rd floors and showroom/storage on part of the ground and all of the basement floors.	APPEAL DECIDED	26-02-1982	Refusal
28952	44-46 Eagle Street, WC1	Retention of metal framed windows in the front elevation at first, second and third floor levels.	FINAL DECISION	17-07-1979	Permission
17192	44-46 Eagle Street, WC1.	Change of use of the existing storage on first floor to office and the existing office area on ground floor to storage, at 44-46 Eagle Street, WC1.	FINAL DECISION	22-08-1973	Limited Period
16670	44-46 Eagle Street, W.C.1.	Change of use of part 1st floor from store to offices at 44-46 Eagle Street, W.C.1.	FINAL DECISION	08-06-1973	Refusal

# Planning Statement

44-46 Eagle Street, Holborn



Application Number	Site Address	Development Description	Status	Date Registered	Decision
16241	44-46 Eagle Street, W.C.1.	Alterations to ground floor windows and entrance door on front elevation of 44-46 Eagle Street, W.C.1.	FINAL DECISION	16-04-1973	Permission
14559(R)	44-46 Eagle Street, WC1	Replacement of existing wooden window frames with similar metal ones at 44-46 Eagle Street, WC1	FINAL DECISION	08-09-1972	Limited Period
13716	44-46 Eagle Street W.C.1.	Change of use of the third and part second floor from workshop to office, part ground floor from storage to office, part basement from workshop to storage at 44-46 Eagle Street W.C.1.	FINAL DECISION	24-05-1972	Limited Period
13040	44-46 Eagle Street, W.C.1.	Replacement of existing timber windows with new metal windows and formation of new window openings in lieu of existing loading bay door openings at 1st and 2nd and 3rd floors of 44-46 Eagle Street, W.C.1.	FINAL DECISION	29-02-1972	Refusal
12633	44-46 Eagle Street WC1R 4AP.	Change of use of third and part second floor from workshop to office, part ground floor from storage to office and part basement from workshop to storage, at 44-46 Eagle Street WC1R 4AP.	FINAL DECISION	05-01-1972	Refusal
CTP/N15/20/A/1	Nos.44-46 Eagle Street, Camden,	The rebuilding of a 2-storey extension at the rear of Nos.44-46 Eagle Street, Camden, for use as a builder's yard, stores and workshop.	FINAL DECISION	14-04-1965	Permission

## Appendix B: Pre-Application Advice Received from London Borough of Camden



**Date: 01/08/2017**  
**Our ref: 2017/2467/PRE**  
**Contact: Samir Benmbarek**  
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*By email*

[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Dear Ms Scaggiante

**Re: 44-46 Eagle Street, London, WC1R 4FS**

Thank you for submitting a pre-planning application enquiry for the above property which was received on 28 April 2017 together with the required fee of £974.00.

**1. Drawings and documents**

Pre-Application 01 for AFT Properties by Buckley Gray Yeoman (June 2017)  
 44 Eagle Street- Summary of Proposals by Buckley Gray Yeoman (11 July 2017)  
 Archival Information by JLL (21 June 2017)  
 Pre-Application Heritage Assessment (July 2017)

**2. Proposal**

Enlargement and replacement of existing windows to front elevation, re-instatement of main office entrance to south-east corner and replacement of doors and gate to front elevation with associated alterations; removal of existing plant and installation of replacement plant; installation of roof lights and associated works to facilitate the formation of a roof terrace to the main building; replacement of windows, removal of pitched roof and works to facilitate the formation of a rear second floor terrace and installation of roof light to existing rear addition; creation of an office 'garden room' with green roof and replacement paving and associated landscaping works to central/rear courtyard

**3. Site description**

The site comprises of a four-storey office (plus basement) building located on the northern side of Eagle Street. The building is located within the Bloomsbury Conservation Area, and it is described within the Bloomsbury Conservation Area Appraisal and Management Strategy as a building that makes a positive contribution to the conservation area. It is not a listed building. The site is located within the Central Activities Zone (CAZ)/Central London Area.

The current building was constructed at the end of the 19<sup>th</sup>/start of the 20<sup>th</sup> century, replacing a previous group of buildings which in turn were believed to have existed since the early 18<sup>th</sup> century. The present building survived air raids and significant bomb damage during the 1940s while neighbouring buildings were damaged, subsequently cleared and replaced during the 1950s and 60s.

The front elevation of the building comprises of red brick vertical bands featuring metal framed windows above rendered spandrel panels with inset brick panels. There is a metal with red paint finish detailing at ground floor level by the windows, doors and gates which are assumed to have been a recent addition during the 1980s and 1990s. At the rear of the building, a two storey rear extension is believed to have been constructed during the 1960s or 1970s. This extension features the red metal detailing as present upon the front elevation at ground floor level. The rear extension features a pitched iron corrugated roof which is in need of replacement as it is known to have asbestos. The current configuration and circulation of the site involves entry being gained via the entrance gate at the centre with the entry door being within the side of the central courtyard.

The neighbouring uses around the application site are a mix of office, eating and drinking and a number of residential uses. Immediately adjacent to the application building to the west and to the north are various purpose built residential blocks built during the 1950s and 1960s as result of wartime damage in the area.

#### 4. Relevant planning history

**2016/6066/P-** Certificate of lawfulness for the existing use of the building as class B1a (office) deemed lawful 17 November 2016.

#### 5. Relevant policies and guidance

##### [National Planning Policy Framework 2012](#)

##### [The London Plan March 2016](#)

##### [Camden Local Plan 2017](#)

G1- Delivery and location of growth  
 C5- Safety and security  
 C6- Access for all  
 E1- Economic development  
 E2- Employment premises and sites  
 A1- Managing the impact of development  
 A3- Biodiversity  
 A4- Noise and vibration  
 D1- Design  
 D2- Heritage  
 D3- Shopfronts  
 CC1- Climate change mitigation  
 CC2- Adapting to climate change  
 CC5- Waste  
 T1- Prioritising walking, cycling and public transport  
 T2- Parking and car –free development  
 T4- Sustainable movement of goods and materials  
 DM1- Delivery and monitoring

##### [Camden Planning Guidance](#)

CPG1 (Design)  
 CPG3 (Sustainability)  
 CPG7 (Transport)  
 CPG8 (Planning Obligations)

## [Bloomsbury Conservation Area Appraisal and Management Strategy 2011](#)

### **6. Introduction**

This written response is based on the drawings submitted within “Drawings and Documents”. This is a general and informal planning officer response to the proposal and development in relation to the submitted drawings and documentation following a pre-application meeting on Tuesday 13 June 2017 and Wednesday 12 June 2017. Should the pre-application scheme be altered, some of the advice given may become redundant as a result of this. The advice may not be considered relevant if adopted planning policies at national, regional or local level are changed or amended. Other factors such as case-law and subsequent planning permission may affect this advice.

### **7. Land Use**

Policies E1 and E2 of the Camden Local Plan seek to protect and increase office space and employment across the borough and within the Central Activities Zone (CAZ).

Currently, the application site contains 1399sqm of office space (B1a). As part of the development, there would be an overall reduction of office space of 13sqm. This is considered acceptable in this instance, as the loss of 76sqm of unusable space at mezzanine level (due to low head height and poor quality as observed on the site visit) will be mitigated. New provision would be provided through the garden room within the courtyard (33sqm) and an additional of 10sqm at ground, first and second floor level.

The Council supports businesses of all sizes, in particular small and medium- sized enterprises (SMEs) as stated in policy E1 of the Camden Local Plan. It would be advantageous that the works would lead to the maintaining of economic development in the area, especially medium to smaller sized firms and start-ups. Details of the types of businesses the development would secure to secure should be submitted as part of any planning application. Discussions with the Council’s Economic Development can be had to get the most out of any proposal.

### **8. Assessment of Proposed Alterations to Front Elevation**

In consideration of Camden Planning Guidance 1 (Design), window replacements are likely to be acceptable were:

- It is necessary to alter or replace windows that are original or in the style of the originals, they should be replaced like for like wherever possible in order to preserve or enhance the character of the property and the surrounding area. New windows should match the originals as closely as possible in terms of type, glazing, patterns and proportions (including the shape, size and placement of glazing bars), opening method, materials and finishes, detailing and overall size of the window opening;
- Upvc windows are not acceptable both aesthetically and for environmental reasons including their relatively short life span and inability to biodegrade;
- In conservation areas, original single-glazed windows often contribute to the character and appearance of an area, and should be retained and upgraded.

In review of the above guidance, submitted documents and site visit(s), there are significant concerns on the proposed window replacement and wider alterations to the front elevation of the application building.

The existing window openings take on a rectangular horizontal form across the front elevation of the building. Within the openings, the existing window design is of white

framed Crittall design that appear as lightweight. The window mechanisms allows the method of opening to be inwards. Between the windows at first, second and third floor levels are white painted spandrels in which upon the centre of the front elevation at second and third floor level feature red horizontal detailing.

The alterations would consist of the window openings to be increased to create taller and narrower floor to ceiling windows with nine panes each forming large squares. The enlargement and alteration to its shape would completely alter the rhythm and the appearance of the façade while introducing more and unnecessary. Furthermore, the enlargement of the windows would erode the detailing of the front elevation, in particular the white spandrels and red detailing resulting in a simple and uninteresting façade.

The detailed design of the windows are also not considered to preserve and enhance the host building or the surrounding conservation area. The framing of the windows are considered to appear heavy and a complete contrast to the existing white framing which appears to be lightweight. The panel design and glazing bar detailed of the existing is also eradicated with no reference to the existing preserved. The opening mechanism of the proposed windows should be retained as inwards.

While the Council would accept the replacement windows being replaced in replica, it does not support the complete change in material, mode of opening, design and enlarged scale of the window opening. This is considered to be evident within the proposed drawings it would adversely alter the character and appearance of the front elevation, which is considered to be an important element overall of its positive contribution to the wider conservation area.

At ground floor level, there is no objection in principle to the main entrance of the building being located and reinstated upon the front elevation. Detailing at ground floor level such as the crow steps and the red metal finishes are recent and are considered to be of no significant value in terms of design and appearance. The erection of a canopy is further considered acceptable. Any lettering or signage upon the canopy will require advertisement consent.

It is considered that the treatment at ground floor level and as a whole would need to be sympathetic to the host building in which by virtue of the alterations at upper floors is considered not to be at present.

Upon discussions and further investigation of the application, a possible alternative design route would be to reinstate the existing elevation to what it appeared in 1972 as observed within the documents "Summary of Proposals" (page 4) and "Pre-Application Heritage Assessment" (page 13). The design of the building previously reflected on its industrial and commercial use prior to it becoming an office.

## **9. Assessment of Garden Room/Extension and Associated Works at Rear**

In consideration of CPG1 (Design), developments in rear land (gardens, courtyards, etc.) should:

- Ensure the siting, location, scale and design of the proposed development has a minimal visual impact on, and is visually subordinate to the host space;
- Use suitable soft landscaping to reduce the impact of the proposed development;
- Ensure building heights will retain visibility over walls and fences;
- Use materials which compliment the host building and the overall character of the surrounding area; and

- Address water run-off independently or cumulatively with the existing or other proposed developments

In review of the above guidance, submitted drawings and site visits, the proposed garden room within the rear courtyard is considered to be an appropriate development. The size and scale of the garden room is subordinate to the application site (and building). The rear courtyard is at a lower ground level in comparison to neighbouring sites and visual impact of the garden room is considered to be minimal when viewed from adjacent sites. Its location at the rear of the application site also results in minimal impact upon the street scene and the wider Bloomsbury conservation area.

The contemporary choice of materials consisting of timber framing, with glazing and metal detailing in this instance is considered acceptable as well as lightweight in its visual appearance and subordinate to the application building. A green roof is proposed above which is supported by the Council. It is recommended green roof details are submitted as part of the application which will be reviewed the Council's Tree and Landscaping Officer. The proposed rooflight upon the garden roof is further not considered to present concerns on design.

While the Council welcomes the planting of new trees into the scheme within the renovated courtyard, it is advised to incorporate more soft/green landscaping for aesthetic and biodiversity purposes in accordance with policy D1 and policy A3 of the Camden Local Plan 2017.

The alterations to the windows at the rear of the building are considered to be acceptable by virtue of its location away from the streetscene and its position upon recent elements of the building such as the rear projection. However, for the purpose of consistency, it may be advised to have the same window design and as recommended by the Council upon the front elevation.

The Council does not object to the replacement of the gates at the front elevation/courtyard entrance as it appears to be a part of the building's alterations during the 1980s/90s. However, the proposed gates are considered to be of a poor design and they do not adequately relate to the application building. Some transparency into the courtyard is suggested as per the existing gates.

#### **10. Assessment of Proposed Roof Alterations/Terraces**

At present, the pitched roof of the rear projection is of corrugated metal, which is in need of replacement as it has been explained that the roof contains asbestos. The proposal would reduce the height of the roof to a flat pitch roof at second floor level. This is considered an acceptable alteration and would reduce its visual bulk when viewed from rear private views from the adjoining residential buildings.

The installation of the 4x rooflights (as a group of 1x) upon the rear projection at second floor level, the installation 6x rooflights along the western perimeter and installation of 4x rooflights near the proposed plant enclosure upon the main roof is considered to be acceptable and would not be visually prominent from the street scene or long views. It is also considered to be appropriate in terms of its scale, size and quantity.

The proposed roof terraces upon the main building and rear projection are considered as acceptable in terms of its minimal impact upon the character and appearance of the application building. However, it is strongly encouraged to change the choice of material of the balustrading from glazing to metal with a painted finish as the glazing element is considered an unsympathetic addition to the building. Further landscaping is encouraged, particularly at second floor level, to further screen the roof terrace treatment. The proposed



sections demonstrate that the terrace and associated balustrading would not be visually prominent from street level.

### **11. Proposed Plant and Associated Works**

The proposal involves the installation of air conditioning units upon the main roof level. As a result of this, it is necessary to submit a noise/acoustic assessment report (by a qualified acoustic engineer) to demonstrate the impact the new plant would have upon the adjoining residential as well as any commercial occupiers.

The principle the proposed plant enclosure at roof level is considered acceptable, subject to the details being acceptable. In its current form it may not be approved due to its scale and bulk upon the roof, especially when viewed from the rear. It is strongly advised to reduce the scale and massing of the enclosure, set it in from the rear elevation and to be sensitively design. The final treatment of the enclosure also needs careful consideration.

### **12. Adjacent Residential Amenity**

Policy A1 of Camden's Local Plan seeks to ensure that the amenity of neighbouring properties is protected. It states that planning permission will not be granted for development that causes harm to the amenity of occupiers and neighbours in terms of loss of daylight, sunlight, outlook and privacy.

By virtue of the minimal scale of the works, it is not considered that the alterations to the front elevation would cause any impact to the amenity of neighbouring residential occupiers as would the window replacements at the rear of the site and changes to the landscaping within the rear courtyard.

The proposed garden room because of its modest height and scale, its position upon the application site which is at a lower ground level than neighbouring sites and the distance between it and nearby residential buildings is considered to be likely to result in a negligible impact upon amenity of the adjacent residential occupiers. The garden roof would be located immediately adjacent to a neighbouring car park and downward ramp to an underground car park on the other side of the boundary wall.

The proposed roof terraces by virtue of their location upon the roof is not considered to harm the amenity of neighbouring residential occupiers in regards to daylight, sunlight and overshadowing. In respect to overlooking and privacy, more information (by way of sections, elevations and relevant commentary) is required to undertake a full assessment of any possible impacts. The use of planters and balustrading is encouraged to minimise opportunities for overlooking. Due to the distances and angles between the proposed terraces and surrounding residential balconies/windows, such impacts are likely to be acceptable if appropriately detailed.

The proposed terraces are in use within an office building and it is not considered would be in use intensively in the same manner as a residential terrace. Both terraces would be controlled by a condition on respect of hours of use and type of use.

### **13. Transport**

As a result of the proposal there would be a GIA of 1,386sqm of retained office space within the application site. Therefore, as part of the scheme, the Council would expect the provision of 16x cycle parking spaces in accordance with the London Plan 2016 and the cycle parking standards as contained within CPG7 (Transport).

A S106 agreement may be required for repaving any footways around the site, as these may be damaged during the construction of the proposed development.

Construction works and construction vehicle movements have the potential to disrupt the day to day functioning of the surrounding highway network for an extended period and will need to be carefully managed to ensure disruption is kept to a minimum. A Construction Management Plan (CMP) may be required to via a S106 agreement due to the location of the development within Central London, in which the highway network experiences congestion. An associated financial contribution of £1,140 would also be secured via a S106 agreement to cover the costs of reviewing, monitoring and enforcing the CMP.

#### **14. Sustainability**

It is not considered a sustainability statement or energy statement would need to be submitted as part of an application due to the nature and scale of the works. As discussed in section 8.0, it is strongly encouraged to introduce more green landscaping within the courtyard to improve sustainability and biodiversity within the site. Green roof details should be provided as part of the application submission if possible. If not, a condition would be attached to provide further information such the application be approved. Another condition may be also secured for management and maintenance details for the green roof.

#### **15. Community Infrastructure Levy (CIL), Planning Obligations and Other Matters**

The proposal would not be liable for either the Mayoral or Camden CIL, as the development does not involve an increase of the GIA of 100sqm or more.

A construction management plan and its associated financial contribution and a highway works contribution may be required via a S106 agreement.

The application site lies within an archaeological priority area. Although the works are unlikely to be an issue, it is advised to consult Greater London Archaeology Advisory Service.

#### **16. Conclusion**

In conclusion, the proposed alterations to the front elevation in its current form are considered detrimental to the character and appearance of the application building and to the wider conservation area. It is recommended that a scheme that retains the design elements of the existing building such as the spandrels and window design and form should be pursued which would be likely to be supported by the Council. Amendments to the plant enclosure are also deemed necessary. In respect to the proposed roof terraces, further evidence is required to assess whether they present any overlooking/privacy issues. The balustrade treatment (glass) is unacceptable and metal railings are recommended. The proposed mechanical plant would require a noise impact assessment that will be reviewed by the Council's Environmental Health Officer.

#### **17. Planning application information**

If you submit a planning application that addresses the outstanding issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – Full Planning Permission
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Design and access statement

- Noise impact assessment
- Manufacturers details/specification of proposed mechanical plant
- Sample photographs/manufacturer details of proposed window details
- The appropriate fee £195.00
- Please see [supporting information for planning applications](#) for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up multiple site notices on or near the site and advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers. For more details click [here](#).

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

If you have any queries about the above letter or the attached document please do not hesitate to contact Samir Benmbarek on 0207 974 2534.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

**Samir Benmbarek**

Planning Officer  
Planning Solutions Team

## Appendix C: Statement from Savills Central London Leasing

22 August 2017

savills

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Dear Mia

**44-46 Eagle Street, London WC1R 4FS  
Leasing Statement from Savills Central London Leasing**

In support of the proposed planning application for 44-46 Eagle Street, London WC1R 4FS we have been asked to provide our views on the likely profile of tenants for the refurbished building and resulting from the marketing of the building.

We have seen the letter from Samir Benmbarek of Camden Planning Solutions team to Mia Scaggiante of Savills Planning dated 1st August 2017 and we are also familiar with both Policy E1 and E2 which are included in the Camden Local Plan and which was adopted in July 2017.

We have been instructed by the owners of the building (AFT Properties Ltd), who are a provider of financial software, they intend to occupy part of the building for themselves to accommodate their own employees and intend to identify tenants / occupiers for their surplus space.

Our marketing objective would be to secure tenants who could lease the office space after any refurbishment had been completed, which would bring the property to a modern standard. The architect's proposals for the refurbishment scheme provide a layout which naturally lends itself to the creation several small office units within the property. Each unit would be suitable for any SME (small and medium sized enterprise).

There are two potential small self-contained office units within the scheme both of which would be accessed directly off the courtyard together with a further two floors within the main building. The intention is to offer the units individually to the market and our view is that because of their fragmented nature they would not appeal to a single tenant. The likely demand will undoubtedly therefore come from SME sized companies and we would anticipate 3 – 4 within the building together with AFT Properties Ltd.

The property is well located especially in terms of transportation, being close to both Holborn, King's Cross and Farringdon stations. The types of businesses likely to find Eagle Street attractive would be wide ranging and could well be located across London and so could bring employment into the Borough.

We consider that the likely occupiers could come from a variety of commercial enterprises. The proposed enhancements on this office building will particularly appeal to companies in the media and creative sectors, many of whom are SMEs and likely to be based in the West End. In particular we would expect interest from graphic designers, advertising agencies and similar associated professionals such as architects who we consider would find the style and image of the proposed enhancements to be particularly appealing.

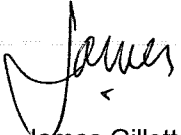
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The building could also attract other sectors such as small software companies, publishing houses and small financial / accounting businesses. Our target market will be extremely wide as a result. The relatively small size of each unit combined with the accessible location will certainly attract new or fledgling start-up companies and the marketing of the available space will be focussed on offering the units individually on short leases, which is likely to satisfy the flexibility SME companies are seeking.

Yours sincerely

A handwritten signature in black ink that reads "James".

James Gillett  
**Director**