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Ms Mia Scaggiante
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By email

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 19th/start of the 20th century, replacing a previous group of buildings which in turn were believed to have existed since the early 18th 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