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Planning Department
Camden Council
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WC1H 9JE

Planning Portal Ref. PP-07264232

Dear Sir/Madam

**16-20 RED LION STREET, LONDON, WC1R 4PQ
APPLICATION FOR A MINOR MATERIAL AMENDMENT MADE UNDER SECTION 73 OF THE TOWN AND
COUNTRY PLANNING ACT 1990 (AS AMENDED) TO PLANNING PERMISSION REF: 2017/3028/P**

On behalf of our client, BNP Paribas Securities Services Trust Company Limited and BNP Paribas Securities Services Trust Company (Jersey) Limited as trustees of the Mayfair Capital Commercial Property Trust, please find enclosed an application for a Minor Material Amendment (MMA) ("the / this Application") under Section 73 of the Town and Country Planning Act 1990 (as amended) to planning permission (ref. 2017/3028/P), relating to 16-20 Red Lion Street, London, WC1R 4PQ ("the / this Site").

Background

On 15 May 2017, the London Borough of Camden ("LBC") granted planning permission (ref. 2016/5571/P) for:

"Erection of roof extension for the creation of a 6th floor following the relocation of roof plant, creation of terraces at ground floor, 1st, 5th and 6th floor levels, extension to rear of building, replacement of all existing single glazed windows and new reception entrance along Red Lion Street and Sandland Street with associated re-cladding. Rendering of existing rear facade. Erection of a canopy to the rear area to create new cycle parking area."

Following the approval of 2016/5571/P, a number of design changes were identified and a minor material amendment (Section 73) application (ref. 2017/3028/P) was then approved by LBC on 31 August 2017, for (subject to a Section 106 Legal Agreement):

"Variation of condition 2 (Drawings) of permission (ref: 2016/5571/P) dated 15/5/17 for Roof extension for the creation of a 6th floor, creation of terraces, extension to rear, alterations to front and rear facades and fenestrations, erection of a canopy for new cycle parking area. Namely to alter front and rear facades and fenestrations including additional rainwater pipes, louvres and additional curtain wall glazing, stairway from 5th to 6th floor and internal room alterations."

Planning permission ref. 2017/3028/P has been implemented and construction began on site in March 2018. Since these works (ref. 2017/3028/P) have begun, a number of issues have become apparent with the front façade and this Application seeks planning permission for design amendments, relating solely to the façade.

Proposed Amendments

A condition survey of the existing front facades has revealed that the insulation within the front facades is combustible, presenting a significant safety concern. The survey also revealed evidence of water ingress and that the curtain walling and punched windows are at the end of their serviceable life.

On this basis, this application seeks to approve revised drawings under Condition 2 of planning permission ref. 2017/3028/P to replace the existing façade with a façade that meets current building control standards in terms of fire safety and replaces out of date features.

The following is a list of the proposed amendments which this Application seeks to make:

1. Replacement of stick system glazing at ground floor level;
2. Removal of existing composite cladding at ground floor level on Sandland Street and replacement with natural stone, Red Lion Street stone to match;
3. Replacement of curtain walling and spandrel panels at levels 1-3;
4. Replacement curved glazing with similar new glazing at levels 1-3; and
5. Replacement of 4th and 5th floor punched windows.

The minor changes proposed to the façade have originated following the design development stage and commencing works on site under reference 2017/3028/P and therefore could not have been envisaged until now.

Informal discussions have taken place with Neil McDonald (Team Manager, Development Management at LBC) on 30 August 2018, regarding the scope and value of these changes.

Application Submission

Accordingly, the following documentation is enclosed:

1. Application form;
2. Covering Letter (i.e. this document);
3. Document Schedule RLS 1D (i.e. schedule/checklist of these 8 documents);
4. Drawing Schedule RLS 2D (i.e. schedule of drawings submitted for approval);
5. Site Location Plan;
6. Existing and proposed floor plans, sections and elevations;
7. Design and Access Statement; and
8. Community Infrastructure Levy form.

Planning and Heritage Statement

The Site

The Site is:

- Located within the administrative area of the London Borough of Camden;
- Approximately 874 sqm in area;
- Located in the Central London Area of LBC. A location plan showing the Site in the context of the surrounding area is included within the Application;

- Located in the Bloomsbury Conservation Area. It does not contain, any statutory or non-statutory listed buildings; and
- Within the Queens Square / Red Lion Square sub-area of LBC.

The existing building consists of six storeys of office accommodation (Basement + Ground + 4 storeys) (Use Class B1). The office floorspace is accessed directly from street level on the ground floor at Sandland Street. Service access is made from a separate access along Sandland Street, which leads to the rear of the building.

The current building was constructed in the 1950s and contains architectural features often attributed to architects such as Walter Gropius and Mies Van der Rohe, both pioneers of the 'Bauhaus' school of architecture. The building was originally clad in brick and later rendered.

The building is L-shaped and occupies the south western section of the Site. A yard area with car parking and electric sub-station occupies the north eastern section of the Site.

Development Plan Designations

The Camden Policy Map outlines that the Site is within:

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

Planning Policy Framework

Statutory Framework

Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise. Paragraph 11 of the revised NPPF (2018) explains that Plans and decisions should apply a presumption in favour of sustainable development.

National Guidance

The National Planning Policy Framework ("the NPPF") was published in July 2018 and updated/superseded the previous NPPF (2012). The NPPF sets out the Government's approach to planning matters and is a material consideration in the determination of planning applications.

At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a 'golden thread' running through both the plan-making and decision-taking process. This means approving development proposals that accord with the development plan without delay, and where the development plan is absent, silent, or out of date, granting permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF.

The Development Plan

The statutory development plan for the Site comprises:

- The London Plan (Further Alterations to the London Plan) (“FALP”) (2016); and
- Camden Local Plan (2017).

Emerging Policy

A new London Plan is currently being prepared. In November 2017 the Draft London Plan was published for public consultation until 2 March 2018. Following receipt of all consultation comments, the GLA intends to submit the London Plan for examination in autumn 2018, with adoption anticipated in autumn 2019.

The new Plan will be the third London Plan. Once adopted, it will replace all previous versions. The concept of ‘Good growth’ underpins the Plan, and ensures a focus on sustainable development. Good Growth is described as being socially and economically inclusive, and environmentally sustainable.

Development Plan Policy

Local Plan Policy D1 (Design) seeks to secure high quality design in development. LBC requires that development respects local context and character; preserves or enhances the historic environment; is sustainable in design and construction; is of sustainable and durable construction; and comprises details and materials that are of high quality and complement the local character.

The policy also seeks to resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Local Plan Policy D2 (Heritage) seeks to preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas. LBC amongst other things, requires that development preserves or, where possible, enhances the character or appearance of the area; and resists the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area.

Planning Assessment

The proposal seeks to replace the current façade given the significant safety concerns and end of life features present. The current flammable insulation currently within the curtain wall, will be replaced with a less flammable alternative, in line with current standards. As well as changes to the insulation, the application proposes to replace the outdated windows and cladding with newer more efficient alternatives. The changes proposed are outlined in more detail within the Design and Access Statement.

The Bloomsbury Conservation Area Advisory Committee raised no concerns to the proposed amendments in their consultation response to the approved 2017 application (ref. 2017/3028/P). It is not anticipated that the changes proposed in this application would result in a scheme that would have unacceptable impact on the Bloomsbury Conservation Area.

The scheme presents improvements to the façade, through providing safer, less flammable insulation, along with various other improvements to the windows, curtain walling and cladding. The proposal proposes only minor changes to the façade and respects local character and context, preserving and enhancing the Bloomsbury Conservation Area. The design improves the current approved scheme (ref. 2017/3028/P) to ensure longevity

of the building in accordance with current building standards, whilst retaining the design concept as already approved.

As such, it is understood that the proposal is in line with National and Local Planning Policy.

The application has been submitted via the Planning Portal under reference PP-07264232. The application fee of £234 has been calculated in accordance with the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2017. The fee has been paid on-line via the planning portal.

We trust that the above information is sufficient for your to validate the application but if you have any queries or require any further information then please do not hesitate to contact Peter Bovill (peter.bovill@montagu-evans.co.uk / 020 7312 7456) or Elizabeth Dewsbury (elizabeth.dewsbury@montagu-evans.co.uk).

Yours faithfully



Montagu Evans