



GERALDEVE

Town Planning Statement
160-161 Drury Lane, London, WC2B 5PN

On behalf of: Palmyra Property Investments Limited

10 April 2019



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1 Executive Summary

- 1.1 The proposals within this application for planning permission, brought forward by Palmyra Property Investments Limited, will provide an exciting opportunity to regenerate this site by delivering a high quality, sustainable, mixed use office-led scheme.
- 1.2 The existing building detracts from the immediate surrounding area with inactive ground floor frontages and heavy external brick façade material. Internally, it provides inefficient office floorspace which does not meet modern day office market needs.
- 1.3 The proposals offer the opportunity to deliver increased, efficient, flexible office floorspace of a high design quality, suitable for multiple businesses of varying sizes, allowing for a greater variety of enterprises to occupy Central London office space.
- 1.4 The proposals would also activate the ground floor through the introduction of flexible retail use to this important street frontage in Camden and Central London, next door to the popular New London Theatre.
- 1.1 The scheme will deliver a number of planning benefits, including:
- A contribution to the regeneration and transformation of the area;
 - Sustainable reuse and regeneration of a building which no longer meets modern office user requirements;
 - Delivering an uplift of 344 sqm (GIA) in high quality business floorspace and a total of 412sqm (GIA) that will contribute to sustainable economic development;
 - Delivering sustainable development through improvements in energy efficiency, being car free and introducing an additional 27 cycle spaces;
 - High quality design, contributing to the wider townscape and conservation area setting and local streetscape; and
 - Contributing to the function and character of the area through the provision of new active public uses at ground floor level to reactivate street frontages.
- 1.5 The development will make a significant contribution to both Camden and London

through maximising the potential opportunity of the site, providing appropriate links to and benefits for the surrounding area and existing communities and according with the Council's aspirations and objectives for the wider area.

2 Introduction

2.1 This Planning Statement is submitted in support of a detailed planning application made on behalf of Palmyra Property Investments Limited ('the applicant') for the remodelling, refurbishment and extension of the site at 160-161 Drury Lane. This statement sets out the town planning case in support of the application. It summarises the planning history of the site and assesses the proposed development in the context of relevant planning policies and guidance.

2.2 The proposals are described in greater detail in the Development Proposals section of this statement. In summary, planning permission is sought for the:

“Demolition of existing fourth floor, replacement of fourth floor and erection of an additional two storeys to the site, full re-skinning of the facades, ground floor alterations including new entrances, single storey extension to existing rear closet wing, reconfiguration of existing external fire escape stair to the rear, reconfiguration of existing external roof plant and introduction of additional plant contained within the volume of the proposed sixth storey extension and all other enabling works in connection with the use of the building as offices (Class B1) at part ground floor and first to seventh floor levels and flexible B1/A1/A3 floorspace at basement and part ground floor level and flexible B1/A1 floorspace at part ground floor level.”

2.3 This planning statement is structured as follows:

- Section 3 – description of the site and surroundings;
- Section 4 – details of the site's background and planning history;
- Section 5 – details of the development proposals;
- Section 7 – relevant planning policy framework;
- Sections 8-14 – assessment of the material planning considerations arising from the application proposals; and
- Section 15 – summary and conclusions.

2.4 The proposed works are designed by Ian Chalk Architects ('ICA') and are described in Section 5 of this statement and within the submitted Design and Access Statement. This statement should be read in conjunction with the proposed plans

and drawings, prepared by ICA, and the following documents which are submitted as part of this application:

- Planning Application Forms and Certificates;
- Design and Access Statement, prepared by ICA;
- Energy and Sustainability Statement, prepared by KUT;
- Environmental Noise Report, prepared by Acoustic Plus;
- Air Quality Assessment, prepared by Air Quality Consultants;
- Ventilation Strategy, prepared by KUT;
- Daylight and Sunlight Report, prepared by Point 2;
- Transport Assessment (including Delivery and Servicing), prepared by Curtins;
- Framework Travel Plan, prepared by Curtins;
- Draft Construction Management Plan, prepared by BTP Group;
- Statement of Community Involvement;
- Community Infrastructure Levy forms; and
- draft Section 106 Heads of Terms (included within this Planning Statement).

2.5 This statement sets out the town planning assessment of the proposed scheme and assesses it in the context of national, regional and local planning policy and guidance

2.6 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act (2004) against which development within the London Borough of Camden (LBC) must be assessed comprises: the London Plan, being the Spatial Development Strategy for Greater London, adopted by the Mayor in July 2011, revised in 2016 and Camden's Local Development Framework (LDF). The LDF consists of Camden's Local Plan (2017), Camden Planning Guidance, Site Allocations Supplementary Planning Documents (SPD), Seven Dials Conservation Area Statement and the Proposals Map.

2.7 Section 3 of this statement goes on to consider the application site and its surrounding area in greater detail.

3 Site and Surroundings

- 3.1 The application site is located in the London Borough of Camden (LBC). The building has facades on two streets: Drury Lane and Parker Street. Drury Lane is a busy traffic route through the area.
- 3.2 The existing building is five storeys in height with one small basement level and was constructed in the 1980s. The site's lawful use is for Class B1 office at part ground floor and across all levels 1-5 and retail at part ground floor and basement level.
- 3.3 The London Plan identifies the application site within the Central Activities Zone (CAZ). The site is not located within any protected views or viewing corridors within the London View Management Framework (2012).
- 3.4 Within the Camden Local Development Framework (LDF), the site is within the London Suburbs Archaeological Priority Area and has a Central London location.
- 3.5 The site is not within a designated town centre. Both the Drury Lane and Parker Street facades at the site are within designated secondary retail frontage. Camden Planning Practice Guidance 'Town Centres and Retail' (2018) identifies the site within Covent Garden secondary retail frontage. Covent Garden is considered **“to be a retail destination of national and international significance”** within the CPG.
- 3.6 Although the site is located within the Seven Dials (Covent Garden) Conservation Area, the conservation area statement states that the site does not make a positive contribution to the Conservation Area. Opposite the site lies the Covent Garden Conservation Area which is within Westminster City Council's (WCC) boundary.
- 3.7 The local authority boundary between WCC and the LBC runs directly opposite the site north to south along Drury Lane.
- 3.8 The site has an excellent public transport accessibility level with the highest rating of PTAL 6b.
- 3.9 Buildings surrounding the site are of mixed scale.

- 3.10 Surrounding properties are primarily in commercial (Class B1 office) and residential (Class C3) use. Larger residential communities are predominantly located to the west in Covent Garden.
- 3.11 The site is located close to many of London's major tourist attractions including: The National London Theatre (directly opposite the site on Parker Street frontage); Covent Garden (market, theatres and retail) to the west; West End Theatres (in all directions) and Oxford Street retail to the north-west.
- 3.12 The site is located in an area undergoing a period of significant investment and change. Parker Tower (ref: 2014/0176/P) and The Post Building (ref: 2014/5946/P) are both schemes located in Camden which demonstrate that the area is delivering mixed-use developments and transforming to provide a destination in Camden where users can live, work and play. The approved scheme (ref: 18/07715/FULL) at the site opposite the application site, within WCC's boundary, further exemplifies the change this area is undergoing and the investment being made to enhance and promote its function and character.

4 Planning History

4.1 In this section the site's planning history is assessed from the original permission for the building on 18 February 1985. A full planning history table is attached at Appendix A of this Planning Statement.

4.2 On 18 February 1985 planning permission (ref: P14/35/E/36129) was granted at 4-24 Parker Street & 160-161 Drury Lane for the following:

“Redevelopment of the site by the erection of a new building comprising basement, ground and 4 storeys to provide residential, offices, retail, light industry and integral garages.”

4.3 An associated listed building consent (ref: P14/35/E/3180) was also granted on 18 February 1985 for the:

“Demolition of 160-161 Drury Lane.”

4.4 On 26 June 2000 planning permission (ref: PSX0004507) was granted at 4-24 Parker Street & 160-161 Drury Lane for the following:

“Alterations to shopfront, including extension to front facades in front of existing pillars and with a new glazed design and relocation of entrance door to corner of Drury Lane and Parker Street.”

4.5 On 20 December 2007, planning permission was refused for the following at the site:

“Alterations to shopfront, including extension to front facades in front of existing pillars and with a new glazed design and relocation of entrance door to corner of Drury Lane and Parker Street.”

The cited reasons for refusal were based on the perceived harm the proposed alterations to the shopfront would cause to the character and appearance of the conservation area.

4.6 On 21 May 2008 planning permission (ref: 2008/1297/P) was granted at 4-24 Parker

Street & 160-161 Drury Lane for the following:

“Alterations to the shopfront, including the relocation of entrance door to corner of Drury Lane and Parker Street.”

- 4.7 Several tables and chairs applications have been made, renewed and approved in respect of the external seating connected to the retail unit at 160 Drury Lane.

Surrounding area

- 4.8 As previously mentioned, directly opposite the site lies “Development Site At Land Bounded By Drury Lane, Dryden Street, Arne Street And Shelton Street”, within the boundary of WCC. An application for planning permission (ref: 18/07715/FULL) at this site received planning permission on 13 February 2019 for the following development:

“Removal of existing third and fourth floor levels and roof top structures and partial demolition of Shelton Street elevation (third floor only); construction of new floorspace and internal reconfiguration resulting in a part five and part six storey building with roof top plant enclosure, to provide flexible commercial use including retail (Class A1), financial and professional services (class A2) restaurant (class A3), office (class B1) and /or assembly and leisure (class D2) at basement and ground floor level and office use (Class B1) at first to fifth floor levels; refurbishment of external elevations; roof terraces, plant, cycle parking and facilities for access and servicing.”

5 Development Proposals

5.1 This application seeks planning permission for the following proposed development:

“Demolition of existing fourth floor, replacement of fourth floor and erection of an additional two storeys to the site, full re-skinning of the facades, ground floor alterations including new entrances, single storey extension to existing rear closet wing, reconfiguration of existing external fire escape stair to the rear, reconfiguration of existing external roof plant and introduction of additional plant contained within the volume of the proposed sixth storey extension and all other enabling works in connection with the use of the building as offices (Class B1) at part ground floor and first to seventh floor levels and flexible B1/A1/A3 floorspace at basement and part ground floor level and flexible B1/A1 floorspace at part ground floor level.”

5.2 The proposed development would see the removal and rebuilding of the existing top (5th) floor of the building and the recladding of the existing building, with the addition of two storeys to create a seven storey building. The ground floor units would also be reconfigured to provide two flexible (Class A1/B1/A3 and Class A1/B1) units and an enhanced office entrance and reception area.

5.3 The scheme will deliver a number of planning benefits including:

- Delivering high quality business floorspace that will contribute to sustainable economic development;
- Delivering sustainable development through improvements in energy efficiency;
- Improving accessibility to, and within, the boundary for all users;
- High quality design, contributing to the character and appearance of the wider townscape and conservation area setting and role of this area as a world class destination; and
- Delivering improved active frontages at ground floor level.

5.4 The development proposals are the result of extensive pre-application consultation with LBC planning and design officers (ref: 2018/0593/PRE). The proposals have also twice been presented to Camden’s Design Review Panel (DRP) for Chair’s

Review. At all times, the team has sought to respond to the comments received and incorporate them into the scheme.

Land Use Summary

5.5 The proposed land use (GIA sqm) at the site is as follows:

Land Use	Existing (sqm GIA)	Proposed (sqm GIA)	Net Change (sqm GIA)
Retail (Class A1)	94	0	-94
Office (Class B1)	1,113	1,457	+344
Flexible Unit 01 Class A1/B1	0	72	+72
Flexible Unit 02 Class B1/A1/A3	0	90	+90
TOTAL	1,207	1,619	+412

5.6 The proposed land use (GEA sqm) at the site is as follows:

Land Use	Existing (sqm GEA)	Proposed (sqm GEA)	Net Change (sqm GEA)
Retail (Class A1)	112	0	-112
Office (Class B1)	1,215	1,623	+408
Flexible Unit 01 Class A1/B1	0	74	+74
Flexible Unit 02 Class B1/A1/A3	0	104	+104
TOTAL	1,327	1,801	+474

6 Consultation

- 6.1 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.
- 6.2 This is reiterated by the National Planning Policy Framework, February 2019, ('NPPF') which states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussions enable better coordination between public and private resources and improve outcomes for the community (paragraph 39).
- 6.3 Consultation is recognised as an essential tool for balancing the views and needs of different interest groups and securing mutually compatible solutions and as such has played an important role in the preparation of this planning application.
- 6.4 NPPF Paragraph 41 reiterates that the more issues that can be resolved at the pre-application stage, the greater the benefits.
- 6.5 The development proposals have been subject to extensive consultation between March 2018 – December 2018. Those consulted include:
- The London Borough of Camden planning and design officers;
 - The London Borough of Camden Chair's Design Review Panel;
 - Covent Garden Community Association (CGCA);
 - Holborn and Covent Garden ward councillors; and
 - Local residents and businesses.

Pre-Application Discussions

- 6.6 Formal pre-application meetings in respect of these development proposals have been held with LBC planning, design and conservation officers on: 1 March 2018, 22 March 2018, 24 July 2018, 3 August 2018 and 12 December 2018.
- 6.7 Several iterations of the proposed design were subject to thorough review throughout the pre-application stage and the development proposals have evolved over the past 10 months to incorporate comments received in relation to design

wherever possible.

- 6.8 The formal pre-application response was received from the LBC on 4 January 2019, which advised that officers consider **“the revised scheme to have broadly addressed all outstanding concerns in relation to design and conservation...”** and that subject to formal testing **“officers would be likely to support the scheme.”**

Design Review Panel

- 6.9 The scheme design has been subject to two Chair’s DRPs, dated 3 August 2018 and 9 November 2018.
- 6.10 The design team have sought to respond directly to the comments received at the DRPs and the design has been amended accordingly. The Design and Access Statement, prepared by ICA, sets out the design discussions held and shows how the design proposed has evolved in response to comments received.

Project Website / Letter Drop

- 6.11 A website introducing the site and describing proposals has been ‘live’ for the general public to view since 17 July 2018.
- 6.12 A letter drop of 3,500 letters was issued to local neighbours and businesses on 17 July 2018. Where responses were received, follow up meetings were held on 24 July 2018 with the Covent Garden Community Association and on 1 November 2018 with local residents.

Statement of Community Involvement

- 6.13 The Statement of Community Involvement (SCI) submitted with this application demonstrates the thorough approach taken towards the consultation process.
- 6.14 Overall the SCI demonstrates that a meaningful engagement process was undertaken in respect of the proposals, which has resulted in the design team being able to capture consultee comments and evolve the scheme accordingly.

- 6.15 The applicant is committed to maintaining an open dialogue with locals and stakeholders throughout the determination and construction phases of the proposed development.

7 Planning Policy Context

- 7.1 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:
- i. The London Plan. The London Plan presents the Mayor's spatial development strategy for London. This document has been consolidated with alterations since 2016. Hereinafter this will be referred to as the London Plan ("LP").
 - ii. The Camden Local Development Framework (LDF). The LDF is made up of Camden's Local Plan (2017) and various adopted Camden Supplementary Planning Guidance documents.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

National Planning Guidance

The National Planning Policy Framework (NPPF) February 2019

- 7.3 The NPPF document sets out the Government's planning policies for England and how these are expected to be applied. It summarises in a single document all previous national planning policy advice. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.
- 7.4 The NPPF introduces the presumption in favour of sustainable development although it makes it clear that the Development Plan is still the starting point for decision making.
- 7.5 The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

- 7.6 One of the core planning principles of the NPPF is that planning should not simply be about scrutiny but instead be “a creative exercise in finding ways to enhance and improve the places in which people live their lives”.
- 7.7 The Ministerial Statement, ‘Planning for Growth’, emphasises the importance of securing economic growth and employment. The document states that when considering planning applications, Local Planning Authorities should support enterprise and facilitate housing, economic and other forms of sustainable development.
- 7.8 In terms of the historic environment, Paragraph 193 of the National Planning Policy Framework sets out that great weight should be given to the conservation of heritage assets. Paragraphs 194-195 set out the tests that need to be met where either ‘substantial harm’ or ‘less than substantial harm’ is caused to heritage assets.
- 7.9 Where any harm is caused the public benefits of the proposal should outweigh this harm.

Planning Practice Guidance, 2014

- 7.10 The Planning Practice Guidance was produced and published by the Department of Communities and Local Government (DCLG) in March 2014. This resource makes Planning Practice Guidance available entirely online and allows users to link between the NPPF and relevant planning practice guidance, as well as other different categories of guidance.

Regional Planning Policy

The London Plan

- 7.11 The London Plan (as amended, 2016) aims to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 years. The London Plan includes London-wide planning policy guidance and sets the relevant regional planning policy guidance for the London Borough of Camden and forms a component part of the statutory development plan.

7.12 The Mayor considers that the greatest challenge faced in London is to accommodate significant growth in ways that respect and improve London's diverse heritage while delivering the vision for an exemplary, sustainable world city.

The Draft New London Plan

7.13 The draft New London Plan was published in December 2017. Consultation took place on the draft document up until 2 March 2018. The Mayor's Minor Suggested Changes to the London Plan were published on 13 August 2018. Adoption of the plan is targeted for late 2019 / early 2020. Once adopted, this will supersede the current London Plan.

Local Planning Policy: Camden Local Plan (2017)

7.14 At the local level, Camden's Local Plan (2017) was adopted by Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

Supplementary Planning Guidance

7.15 Other relevant LBC Supplementary and Design Guidance of relevance to this application includes:

- Camden Planning Guidance– Design (March 2019);
- Camden Planning Guidance (CPG2) – Housing (May 2006 updated March 2019);
- Camden Planning Guidance – Interim Housing (March 2019);
- Camden Planning Guidance 3 (CPG3) – Sustainability (July 2015, updated March 2018);
- Camden Planning Guidance – Energy efficiency and adaptation (March 2019);
- Camden Planning Guidance – Town centres and retail (March 2018);
- Camden Planning Guidance 6 (CPG6) – Amenity (September 2011, updated

March 2018);

- Camden Planning Guidance– Air Quality (March 2019) (this replaces Chapter 2 of CPG6 ‘Amenity’);
- Camden Planning Guidance– Transport (March 2019); and
- Camden Planning Guidance– Developer Contributions (March 2019).

Site Specific Allocations

7.16 Within the London Plan, the site is located in the Central Activities Zone (“CAZ”). The London Plan notes that the CAZ contains a unique cluster of vitally important activities including central government offices, headquarters and embassies, the largest concentration of London’s financial and globally-orientated business services sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media. The London Plan identifies that the Mayor and boroughs should inter alia recognise that the CAZ is the heart of London’s world city offer and promote and coordinate development so that together they provide a competitive, integrated and varied global business location.

7.17 On the LDF ‘Policies Map Alterations’ the application site is located in the Central London Area. The site is also is designated as within the London Suburbs Archaeological Priority Area.

Legislative Framework

7.18 Given the site’s location within a conservation area, statute regarding the historic environment is relevant.

7.19 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Principal Planning Matters

7.20 The development proposals have been assessed against the following principal planning matters:

- i. Land Use;
- ii. Design;
- iii. Heritage and Views;
- iv. Environment and Sustainability;
- v. Amenity; and
- vi. Transport.

8 Land Use

8.1 This section assesses the proposals against relevant national, regional and local land use planning policies.

Principle of Development at the Site

8.2 One of the aims set out in the NPPF (2019) is to ensure that developments optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks (paragraph 104). It is therefore important to ensure that a range of needs can be met through a new development.

8.3 The site is located within the London Plan defined CAZ and Camden's Central London Area.

8.4 The London Plan states that the Mayor is committed to protecting the unique character of the CAZ which covers London's geographic, economic and administrative core. The Mayor's strategic priorities for the CAZ are set out in Policy 2.10 of the London Plan and include:-

- Enhance and promote the unique international, national and London wide roles of the CAZ, supporting the distinct offer of the Zone;
- In appropriate quarters, bring forward development capacity and supporting infrastructure and services without compromising residential neighbourhoods;
- Sustain and enhance the distinctive environment and heritage of the CAZ;
- In appropriate parts of the CAZ ensure that development of offices is not strategically constrained and that provision is made for a range of occupiers; and
- Improve infrastructure for public transport, cycling and walking and optimise

the development and regeneration benefits they can support.

Assessment

- 8.5 It is therefore entirely appropriate for the site to be developed for a commercial-led mixed use scheme in principle land use planning terms.

Office

Policy

- 8.6 The NPPF sets out the Government's commitment to securing economic growth and advises that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century.
- 8.7 The Ministerial Planning for Growth Statement, March 2011, notes the importance of securing economic growth and employment. The guidance considers that Local Planning Authorities should consider the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession and consider the range of likely economic, environmental and social benefits of proposals; including long term indirect benefits such as increased consumer choice, more viable communities and more robust local economies.
- 8.8 The London Plan notes that the CAZ contains a unique cluster of vitally important activities including central government offices, headquarters and embassies, the largest concentration of London's financial and globally-orientated business services sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media.
- 8.9 The supporting text of London Plan policy 4.2 acknowledges that in the CAZ, there remains a strong long-term office demand and a substantial development pipeline which is partly subject to the implementation of Crossrail (para 4.14). Environmental improvements in these locations continue to be needed to enhance its attraction as a global business destination.

- 8.10 Policy E1 of the LBC's Local Plan explains that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.
- 8.11 The policy goes on to state that new office development will be directed to the growth areas and Central London. Part i) recognises the importance of other employment generating uses, including retail. Furthermore, the Council will support proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites.
- 8.12 Local Plan Policy E2 encourages the provision of employment premises and sites in the borough and seeks to protect premises or sites that are suitable for continued business use. The policy states that the Council will consider higher intensity redevelopment of premises or sites that are suitable for continued business use provided that:
- c. the level of employment floorspace is increased or at least maintained;
 - d. the redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or the local economy;
 - e. it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy and will be to a sustainable location;
 - f. the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;
 - g. the scheme would increase employment opportunities for local residents, including training and apprenticeships;
 - h. the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and
 - i. for larger employment sites, any redevelopment is part of a comprehensive scheme.

Assessment

- 8.13 The proposals for 160-161 Drury Lane involve the intensification of the existing employment use at the site in line with Local Plan Policy E1(i) through the refurbishment and extension of the existing building to provide a total of 1,457 sqm (GIA) flexible office floorspace (an uplift of 344 sqm GIA) across part of the ground floor and levels 1-6. The existing building is currently in office use therefore the principle of office use at the site is established.
- 8.14 The site is located within the Central Activities Zone and is very highly accessible via public transport (PTAL rating 6b – the highest level). As such an increase in office floorspace in this location would again be supported in principle.
- 8.15 The proposed development would meet the tests of Local Plan Policy E2 in the following ways:
- c) the proposed development would increase the level of employment floorspace at the site by 344 sqm GIA;
 - d) the type of businesses to use the site will be maintained as a result of the development (ie. Class B1(a) tenants);
 - f) The proposals have been designed to create an office building which will provide flexible internal floorspace. The open floor plate can then be subdivided as required by tenants;
 - g) endeavours will be made to ensure apprentices are on site during the construction phase; and
 - h) the scheme will provide a payment in lieu of housing at the site (see discussion within Mixed Use paragraphs of this statement and Housing Study, prepared by ICA). The sum has been agreed with LBC and is included in the proposed Heads of Terms.

Conclusion

- 8.16 The proposals will intensify the commercial floorspace at the site as they will lead to an increase in the types of companies that can operate at the site and increase the

variety of the job provision in the area, significantly contributing towards meeting the targets set out in the London Plan and contributing to the character and function of the CAZ.

- 8.17 The proposals will facilitate modern occupier demands and are in accordance with the aspirations of the London Plan which seeks renovation/renewal of office stock to increase and enhance the quality and flexibility of London's office market.
- 8.18 The proposal is in line with NPPF economic growth objectives and therefore accords with Policy 4.2 of the London Plan and Camden Local Plan Policies E1 and E2.

Flexible Retail

Policy

- 8.19 At a national planning policy level, paragraph 85 of the NPPF states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the Plan period.
- 8.20 The guidance makes clear that local planning authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres.
- 8.21 At a regional level, the London Plan sets out a number of policies relating to town centres and retail development.
- 8.22 Within the CAZ, the London Plan seeks to support and improve the retail offer for resident, workers and visitors especially within the West End as a global shopping destination (Policy 2.10). In addition, the London Plan acknowledges one of the CAZ's strategic functions is to ensure that development provides for a mix of uses (Policy 2.11).
- 8.23 London Plan policy 2.15 sets out the requirements for development proposals within town centres. They should aim to:-
- i. Sustain and enhance the vitality and viability of the centre;
 - ii. Accommodate economic and/or housing growth through intensification and

- selective expansion in appropriate locations;
- iii. Support and enhance the competitiveness, quality and diversity of town centre retail, leisure and other consumer services;
- iv. Be in scale with the centre;
- v. Promote access by public transport, walking and cycling;
- vi. Promote safety, security and 'lifetime neighbourhoods';
- vii. Contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure; and
- viii. Reduce delivery, servicing and road users' conflict.

- 8.24 London Plan Policy 4.7 relates to retail and town centre development in relation to the London Plan strategic direction and planning decisions. The policy seeks to support a strong approach to assessing need and bringing forward capacity for retail development in town centres. The scale of retail should be related to the size, role and function of a town centre and its catchment.
- 8.25 In addition, London Plan Policy 4.8 seeks to support a successful and diverse retail sector.
- 8.26 At a local level, Local Plan Policy E1 part (i) recognises the importance of other employment generating uses, including retail within office developments in Central London.
- 8.27 Local Plan Policy G1 demonstrates the Council's ambition to create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by support development that makes best use of its site and supporting a mix of uses on site where it can be demonstrated that this contributes towards achieved
- 8.28 Policy TC1 states that the delivery of retail growth and related uses can be provided in designated growth areas and existing centres. Policy TC1 also seeks to protect and support areas of specialist shopping. Local Plan Policy TC3 resists the loss of Class A1 use outside of town centres unless a) an alternative provision is available within 5-10 minutes' walking distance; b) there is clear evidence that the current use

is not viable; and c) within the Central London Area, the development positively contributes to local character, function, viability and amenity.

8.29 According to Local Plan Policy TC2, LBC will promote successful centres for residents, visitors and workers by:

- i. Seeking to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre;
- ii. Providing for and maintaining a range of shops, services, food, drink and other suitable uses to provide variety, vibrancy and choice;
- iii. Protecting and promoting small and independent shops, and resisting the loss of shops where it would cause harm to the character and function of a centre;
- iv. Making sure that food, drink, and entertainment uses do not have a harmful impact on residents and the local area, and focusing such uses in Camden's Central London Frontages, Town Centres;
- v. Supporting and protecting Camden's local shops, markets and areas of specialist shopping;
- vi. Pursuing the individual planning objectives for each centre.

8.30 Camden Planning Practice Guidance 'Town Centres and Retail' (2018) identifies the site within Covent Garden secondary retail frontage. Covent Garden is considered "to be a retail destination of national and international significance".

8.31 The CPG states that the Covent Garden area has a fine grain of development with mostly smaller sized shop premises. The shopping environment in Covent Garden is of a high quality and there is a relatively small proportion of supporting uses, in particular cafes.

8.32 The table on page 30 of the CPG demonstrates that there is no required 'minimum proportion of A1 shops in each individual frontage' in relation to secondary retail frontages. The table does set a maximum of 25% Class A3, A4 and A5 uses combined within Covent Garden's secondary retail frontages.

8.33 The CPG states that the percentage is calculated as the number of premises in the specified use as a percentage of the total number of premises within the frontage.

Assessment

- 8.34 It is proposed to introduce flexible retail uses at ground floor and basement level at the site. One unit will be flexible Class A1/A3/B1 use (90 sqm GIA), the second will be flexible Class A1/B1 use (72 sqm GIA).
- 8.35 The development site lies within Central London (the CAZ) and therefore should be promoted as part of a competitive town centre which provides customer choice and a diverse retail offer in line with the NPPF, London Plan and LDF aspirations.
- 8.36 Both the Drury Lane and Parker Street facades at the site are within designated secondary retail frontage and the site is within the Seven Dials centre.
- 8.37 The site's surrounding area is characterised by entertainment use where there is relatively few neighbouring residential uses and the site is opposite the New London Theatre and the Tropicana Beach Club on Parker Street. The Tropicana Beach Club's opening hours are advertised as: 17:00-02:30 on Fridays and Saturdays and 17:00-01:00 on Thursdays.
- 8.38 According to Google Maps, the existing ground floor use within the designated secondary frontage is as follows:

Address	Occupier / Use Class
158 Drury Lane (not within application site boundary)	Tavio Express (convenience shop) / A1
159 Drury Lane (not within application site boundary)	Hayato London (hairdressers) / A1
160 Drury Lane	Abokado / A1
161 Drury Lane	Office Entrance / B1

4 Parker Street	Vacant
6 Parker Street	Office / B1

8.39 Therefore the existing situation is:

- a. 50% Class A1 Use;
- b. 33% Class B1 Use; and
- c. 17% vacant.

8.40 The units proposed at ground floor are as follows:

	Flexible (A1/A3/B1) Drury Lane (sqm)	Office (B1) Parker Street	Flexible (A1/B1) Parker Street (sqm)
Basement	25	0	0
Ground	65	145	72
Total	90	145	72

8.41 Neither of the flexible units proposed exceed 100sqm GIA in total floor area. This is in line with the table at page 30 of the CPG (2018) which sets a maximum size of 100sqm for food, drink and entertainment uses and is also in character with the fine-grain, smaller unit retail character of the area identified in the same document.

8.42 The proposed mixed use elements would bring the ground floor of the building to life, enhance the vitality of the area and be in keeping with the existing uses within the area, without harming the amenity of local residents in accordance with the objectives of Camden Local Plan Policy TC3 and E1.

8.43 The pre-application feedback dated 4 January 2019 states that the proposals do not accord with Camden Local Planning Policy. The applicant acknowledges this, however the proposals for flexible uses at ground floor level will deliver the following benefits to the site and its immediately surrounding area:

- deliver employment generating uses to support the proposed enhanced office floorspace refurbishment and extension, in line with Camden Local Plan Policy E1;
- reactivate the streetscene by introducing uses which will encourage interaction between the street and the inside of the site;
- revitalise the ground floor at the site which is a poor contributor to the local area;
- enable ground floor façade improvements to enhance the character and appearance of the Seven Dials Conservation Area;
- increase the natural surveillance at the site; and
- contribute to the character and function of this important part of the Covent Garden area which is a retail destination of international significance.

These identified public benefits present material considerations (as per the tests of Section 38(6) of the Town and Country Planning Act) which should override the apparent policy non-compliance of the proposals to allow them to be considered acceptable.

- 8.44 Furthermore the flexible uses would also allow for the ground floor frontage of Parker Street to be solely Class B1. As part of the site is in existing office use, the retention of B1 use at ground floor would not harm the function or character of the local area.
- 8.45 The CPG states that when assessing applications within Covent Garden's designated retail frontages, the council will take into account the number and mix of uses in adjacent and opposite premises. The land uses in the surrounding area would be enhanced and supported by the proposed land uses at ground floor, in line with the objective of Camden Local Plan Policy TC1 which states that retail floorspace within town centres is expected to be supported by a range of other town centre uses, including food, drink and entertainment uses.

Conclusion

- 8.46 As existing, 160-161 Drury Lane offers a very poor ground floor presence considering its Central London location. The proposed development will create an animated ground floor offer that generates 'a sense of place' with good synergy between the upper floor commercial uses and the active uses at lower floors. The

proposals present the opportunity to activate the frontages at ground floor with uses that respond to the location, the design intention of the site as a whole and the local users and residents.

- 8.47 Not only will the active uses be available to users of the commercial floorspace at the site, the active uses proposed will offer convenience to the local user and tourist and offer a reflection of the very central location within a major cultural and historical centre, Covent Garden.
- 8.48 A strict operational and management policy would be put in place, dealing with such considerations as refuse handling, good deliveries, maintenance and cleaning of any extract duct and use of external seating areas to ensure that existing amenity is protected, in line with Camden Local Plan Policy A1.
- 8.49 The proposed flexible retail uses are an opportunity to activate the ground floor frontages to be in keeping with the character and function of the site's immediately surrounding area, which is acknowledged as a retail destination of international importance. The flexible uses will also reactivate the ground floor of the site and improve the appearance of the ground floor in the conservation area. Therefore there are material considerations which outweigh the policy non-compliance of the proposed land uses at ground floor. The proposed land uses are appropriate for the site and its surrounding area and are therefore acceptable.

Mixed Use

Policy

- 8.50 London Plan Policies 2.11 and 4.3 states that the Mayor and Boroughs should ensure that development proposals to increase office floorspace within the CAZ include a mix of uses including housing. This has, however, been supplemented by the recently adopted CAZ SPD. The emphasis of this SPD is to encourage the provision of office and business floorspace within the CAZ and the document sees a shift towards greater weight being placed on the provision of offices and other CAZ strategic functions relative to new residential. In this particular location it states that offices and other CAZ strategic functions should be given greater weight relative to new residential.

- 8.51 At a local level, policy H2 contained within the Camden Local Plan states that, where non-residential development is proposed, the Council will promote the inclusion of self-contained homes as part of a mix of uses. In the Central London Area (where the site is located) where development involves additional floorspace of more than 200sqm (GIA), Camden will require 50% of all additional floorspace to be self-contained housing, subject to the following considerations.
- 8.52 According to Local Plan Policy H2, in the Central London Area, the Council will consider whether self-contained housing is required as part of a mix of uses taking the following into account:
- a. the character of the development, the site and the area;
 - b. site size, and any constraints on developing the site for a mix of uses;
 - c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
 - d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
 - e. whether the development is publicly funded or serves a public purpose.
- 8.53 The policy goes on to state that, where housing is required as part of a mix of uses, the Council will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.
- 8.54 In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, the Council will take into account criteria (a) to (e) and the following additional criteria:
- f. the need to add to community safety by providing an active street frontage and natural surveillance;
 - g. the extent of any additional floorspace needed for an existing user;

- h. the impact of a mix of uses on the efficiency and overall quantum of development;
- i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

Assessment

- 8.55 The proposals result in a gross uplift of 412 sqm (GIA). Under Policy H2, a total of 206 sqm (GIA) of on-site residential would therefore be required.
- 8.56 As acknowledged in the Local Plan, the Council gives priority to housing but not to the extent that this priority should override the need to protect some non-residential uses across the borough, nor should its inclusion within a development's mix of uses adversely impact on the efficiency an overall quantum of the development. It is also noted that priority for housing needs to be considered in the context of the characteristics of specific areas, sites and properties.
- 8.57 As part of the pre-application discussions with the planning officers at the council, the project team examined the potential for housing to be provided on site in accordance with Policy H2 and concluded that in this instance, it is not feasible to introduce residential floorspace as part of the proposals. The following paragraphs respond to the Policy H2 criteria, where applicable.
- 8.58 This section should also be read in conjunction with the Residential Study, prepared by ICA, submitted in support of this application, which demonstrates architecturally how the site and the proposed development are inappropriate for the provision of residential units.

a) The character of the development, the site and the area;

- 8.59 There is limited capacity to accommodate residential development on the site as the proposed development is a refurbishment and minor extension of an existing office-led building.
- 8.60 Furthermore, the site is in the CAZ where office use is given greater weight than

residential use in the adopted CAZ SPG. Employment floorspace in this location is therefore protected and promoted.

- 8.61 The pre-application feedback, dated 4 January 2019 acknowledges that **“the development is not of a significant scale and would provide additional employment space (another priority land use in the Borough)”**.

b) site size, and any constraints on developing the site for a mix of uses;

- 8.62 The existing floorplates are designed for commercial use and are not readily adaptable for residential use having regard to London Housing SPG standards.
- 8.63 During the pre-application process the project team has investigated the potential to provide residential accommodation at the site through two design options and found that the site presented the following design limitations to delivering residential units:

Option 01

- i. Significant portion of residential accommodation with limited outlook/access to daylight;
- ii. All residential accommodation is single aspect;
- iii. Significant portion of residential accommodation with restricted width results in inefficient internal space planning;
- iv. Location of office core will result in excessive residential corridors with limited access to natural light;
- v. Limited scope for private/semi private amenity space;
- vi. Loss of active business frontage at ground floor level;
- vii. Compromised office space at ground and first floor level;
- viii. Limited scope for mixed tenure due to nature of core;

Option 02

- ix. Maximum of one residential unit available;

- x. Several limited use areas due to receding roof form;
- xi. Over 75% of residential GIA is for circulation only.
- xii. Compromised office floor plate at all levels.
- xiii. Limited scope for mixed tenure due to nature of core.

8.64 The pre-application feedback recognises that the inclusion of residential use within the proposed development would **“not be feasible without harming the function and quantum of business uses onsite”** given the site’s physical constraints, in particular its narrow width and limited floor plate.

f) the need to add to community safety by providing an active street frontage and natural surveillance

8.65 The proposal seeks to provide active street frontages and natural surveillance through the introduction of flexible Class A1/A3/B1 and Class A1/B1 uses at ground floor level. If residential accommodation were provided, an additional core would be required which would inevitably reduce the level of active street frontage around the perimeter of the building.

h) the impact of a mix of uses on the efficiency and overall quantum of development.

8.66 The Local Plan Policy E1 sets out the need to protect and enhance existing employment sites. The site is extremely well connected in terms of public transport accessibility. Policy G1 seeks to focus Camden’s growth in the most suitable locations, and manage it to make sure that Camden delivers its opportunities and benefits and achieves sustainable development, while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit.

8.67 Policy E1 considers that the Council will secure a strong economy in Camden through safeguarding existing employment sites and premises in the Borough that meet the needs of modern industry and other employers; safeguarding the borough’s main Industry Area; encouraging a mix of employment facilities and types including the provision of facilities suitable for a mix of small and medium sized enterprises; support local enterprise development, employment and training

schemes for Camden residents; recognise and encourage the concentrations of creative and cultural businesses in the Borough

- 8.68 Policy E2 seeks to encourage and protect employment sites and an Article 4 direction seeks to ensure that the existing building cannot be converted into residential under Permitted Development rights.
- 8.69 The introduction of residential use within the proposed development would adversely impact on the proposed mix of uses reducing the quantum of usable commercial floorspace delivered by the proposed scheme, making the scheme unviable and thereby preventing the delivery of increased, flexible office floorplate to the Borough, which is a priority land use for Camden.
- 8.70 The Applicant does not own any alternative sites within the Borough which could be used to accommodate the residential requirement.

j) whether an alternative approach could better meet the objectives of this policy and the Local Plan

- 8.71 Office use is a land use priority within Camden. The proposed development would deliver an increase of 344sqm GIA of high quality, fit for purpose, flexible Class B1 floorspace to meet the market need in line with the wider economic and employment objectives of Camden's Local Plan.
- 8.72 In this case, the optimum way to meet the Local Plan objectives and that of Policy H2 would be to make a payment in lieu contribution to the borough which could then be used to deliver affordable housing at more appropriate sites in the borough. Excluding residential use from the proposals ensures that this policy objective is met and that the development opportunity for commercial floorspace at the site is maximised in line with the wider objectives of Camden's Local Plan as residential use would lead to the loss of office area across all the floor plates and would only deliver one market residential unit.

Conclusion

- 8.73 The assessment has demonstrated that the proposed development should not lead to a requirement to provide on-site residential use.
- 8.74 The pre-application feedback (ref: 2018/0593/PRE) advises that **“a lack of onsite**

residential is not likely to be objectionable in this instance.” The pre-application feedback goes on to state that a financial contribution would likely be sought to address the policy requirement. The Applicant has calculated the Payment in Lieu based on an uplift and 474 sqm GEA, in line with Camden Practice Guidance ‘Interim Housing’ (March 2018) and Local Plan Policy H2.

9 Design

9.1 This section reviews the proposals against relevant national, regional and local planning policy in term of design.

Policy

9.2 The NPPF stipulates that 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 (Chapter 12).

9.3 It identifies that securing high quality and inclusive design goes beyond aesthetic considerations. Therefore planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment (Paragraph 185).

9.4 Policies 5.3 and 7.2 of the London Plan seek development to meet the highest standards of sustainable and accessible design and construction, to improve the environmental performance of new development and to adapt to the effects of climate change over their lifetime.

9.5 London Plan Policy 7.3 advises that design should encourage a level of human activity that is appropriate to the location, to maximise activity throughout the day and night, creating a reduced risk of crime and sense of safety at all time.

9.6 London Plan Policies 7.4, 7.5 and 7.6 seek to ensure that development respects the local character of the area; promotes high quality public realm; and ensures that the architecture makes a positive contribution to a coherent public realm, streetscape and wider cityscape.

9.7 London Plan Policy 7.6 sets out a series of overarching design principles for development in London and advises that large scale buildings should be of the highest quality design, including inter alia:

- i. Optimise the potential of sites;
- ii. Promote high quality inclusive design;

- iii. Incorporate the best practice in resource management and climate change mitigation;
- iv. Comprise materials and details which complement local architectural character; and
- v. Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm.

9.8 At a local level, Camden Local Plan Policy D1 seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use.

9.9 This policy reflects the London Plan design and principles and goes on to state that the Council will require all developments to be of the highest standard of design and will expect developments to consider:

- i. The character, setting, context and form and scale of neighbouring buildings;
- ii. The character and proportion of the existing building;
- iii. The quality of materials to be used;
- iv. The provision of visually interesting frontages at street level;
- v. The appropriate location for building services equipment;
- vi. The provision of appropriate hard and soft landscaping; and
- vii. The provision of appropriate amenity space.

9.10 Camden has also published a Planning Guidance SPD (March 2019) which establishes design principles to be used in the assessment of development proposals. The document reinforces or where necessary amplifies existing guidance and defines the Council's expectations for new buildings, as positive and enduring additions to this unique urban landscape. The key messages are to consider:

- i. The context of a development and its surrounding area;
- ii. The design of the building itself;
- iii. The use and function of the building;
- iv. Using good quality sustainable materials;
- v. Creating well connected public spaces and good quality public realm;

- vi. Opportunities for promoting health and wellbeing;
- vii. Opportunities for improving the character and quality of an area.

Assessment

- 9.11 The project architects, ICA, have designed a coherent and legible scheme of a warehouse aesthetic which respects the character and appearance of the surrounding area and provides an enhanced frontage to both the busy Drury Lane and quieter Parker Street.
- 9.12 A detailed Design and Access Statement (DAS), prepared by ICA, has been submitted to accompany this planning application. The DAS sets out in detail the key design matters which have been considered as part of the proposals.
- 9.13 The proposal has been carefully designed following detailed pre-application discussions with Camden Council officers (ref: 2018/0593/PRE) and two Design Review Panels (Chair level). During the pre-application process, the parapet at the roofline has been reduced in height so as to better stitch into the existing roofscape; the elevations simplified to create a strong corner at the junction of Drury Lane and Parker Street and a vertical rhythm to the façade has been introduced to reference the surrounding street pattern. The proposed materials have been selected to create a texture and richness to the site whilst also reflecting the historic materials in the immediate surrounding area, specifically those used on industrial, warehouse buildings (see p.55 of the Design and Access Statement).

Extension and Terraces

- 9.14 In order to ensure that the proposed extension is appropriate geometrically, several models have been reviewed during the design development to test the form and facade at various scales.
- 9.15 This has led to a proposal rich with warehouse character and materiality and references to the context of the Seven Dials conservation area.
- 9.16 The proposed asymmetric roof of the proposed extension does not feature any plant on top or on the terraces either side of it. Instead, additional plant at this level is stored within the lift overrun; therefore the proposals consolidate what was an

unsightly existing roofline.

Drury Lane and Parker Street Facades

- 9.17 The current cavity-wall facade sits on top of uncharacteristic wharf style columns that clash with their context. Stuck on details, poor modern alterations and a top storey which do not speak of the warehouse character below further disrupt the elevation.
- 9.18 The façade design has been developed following a review of the historic plot width of the site.
- 9.19 On the Parker Street elevation it is proposed to restore the historic plot size, allowing a grid pattern to be established that creates a shift along the new proposed Parker Street facade.
- 9.20 Along the Drury Lane façade, as with Parker Street, returning to the original plot widths allows the windows and brick piers to widen and feel more substantial. The right hand bay reflects the historic narrow plot that was in this position and also acknowledges the neighbour, beginning to shift in scale.
- 9.21 The scale of the original plot widths better suits a warehouse-inspired treatment appropriate to its context. A greater depth and width of brick replaces the shallow piers and wharf columns of the existing building.
- 9.22 The materiality of the facades will pick up on the brick and stone tones of the local area and transition between Parker Street and more varied Drury Lane. The bricks will have pinks and reds and consistent colours for all windows, doors and metal elements create greater uniformity within the retained frontages.
- 9.23 For the warehouse aesthetic to be implemented successfully, the brick details need to be convincing and the size of the reveals needs to be sufficiently deep to give the appearance of weight. Top floor, typical and ground floor windows have been developed and studied to see how this can be provided as a re-clad envelope and maintain a depth, quality and consistency seen in the neighbouring warehouse buildings (see DAS page 57).

9.24 The following proposed design interventions will support the character and appearance of the area and deliver the warehouse aesthetic:

- i. Brick details such as the stepped brick at the first floor add weight;
- ii. Deep reveals and punched openings echo the character of the Seven Dials Conservation area;
- iii. Metal framed slots in the facade at either end of the elevation follow the local logic of shifting the facades in the final bays and add to the industrial feel of the proposals;
- iv. Deeper cornice line makes the 'base, middle, top' more apparent;
- v. Shallower arched heads typify local warehouses;
- vi. Asymmetric workshop roof is more appropriate to the new typology; and
- vii. Warehouse roof set-back from the building footprint at either end, forming a better relationship to its context and adding greater variety to the local roofscape

Ground Floor

9.25 The existing ground floor elevation lacks clarity and unity. Multiple architectural features such as wharf columns, small tiled sections, patches of render and heavily subdivide glazing sit uncomfortably with each other without consistency in form, style or aperture.

9.26 The proposals will introduce activity and vitality to the streetscene which will support the character and function of the area through the following proposed design interventions:

- i. Brick piers and deep reveals at ground floor frame an active frontage; and
- ii. Brick details such as the corbelled entrance add weight.

Rear Elevation

9.27 It is proposed to demolish the existing fire escape which is considered an eyesore and detrimental to the amenity of the residential uses surrounding the site. The fire escape will be replaced with a more sensitive designed escape.

9.28 It is also proposed to extend the existing rear single storey extension by one storey. This will house office floorspace and an open plant room.

- 9.29 The colour and character of the Drury Lane and Parker Street facades is continued to the rear. New windows and ventilation extracts provide a more comfortable internal environment and better appearance externally. Painting the existing brick at the lower levels in a paler colour will lighten the courtyard and mask the currently yellow-brown buff brick that faces into the courtyard.
- 9.30 The pre-application feedback acknowledges that the revised scheme submitted for feedback in December 2018 has been informed by each stage of the pre-application process as well as discussions with the Council’s design officers and DRP and **“appears to have broadly addressed all chief concerns in relation to design and conservation.”**
- 9.31 Paragraph 5.17 of the pre-application feedback requested that the applicant present as much detail as possible upfront. Therefore pages 56 and 57 of the DAS demonstrate the façade wall construction and window design details.

Conclusion

- 9.32 As a result of the collaborative and thorough pre-application discussions, the scheme design is considered by Camden officers to **“represent a high quality scheme of extension and refurbishment which would not appear overly dominant in local or long views and would greatly improve the appearance of the existing building... as such officers would be supportive of the scheme in terms of design and conservation”**
- 9.33 The design of the proposed development therefore accords with National and Regional Guidance, Camden Local Plan Design Policy D1 (i-vii) tests and is in line with Camden’s Design SPD key messages for delivering excellent design.

10 Townscape and Heritage

Conservation Areas and Listed Buildings

Policy

- 10.1 Under paragraph 189 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting.
- 10.2 Paragraph 192 states that in determining planning applications, local planning authorities should take account of;
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 10.3 When considering the 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. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.
- 10.4 Where a development proposal will lead to a less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 195).
- 10.5 Camden Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. In order to maintain the character of Camden's conservation areas the council will require that development within conservation areas preserves or, where possible, enhances the character or

appearance of the area. The Council will also resist development that would cause harm to significance of a listed building through an effect on its setting.

- 10.6 The Seven Dials area was laid out at the end of the 17th century. According to the Conservation Area statement, the significance of the Seven Dials (Covent Garden) Conservation Area lies in its highly distinctive radiating street pattern.

Assessment

- 10.7 The site is located with Camden's Seven Dials Conservation Area and is adjacent to Westminster's Covent Garden Conservation Area. As a result, the character and appearance of both conservation areas must be considered.
- 10.8 The refurbishment and extension of the building has been carefully designed to both respect and reflect the heritage of the site and the surrounding area. This is clear in the Design and Access Statement, prepared by ICA as the scale and grain of the surrounding area has been assessed and the conservation area appraisal thoroughly reviewed.
- 10.9 The façade design has been based on the site's historic plot width (see DAS pages 39-41) which has created an authentic response to the warehouse architecture proposed.
- 10.10 Although the extensions proposed would increase the height of the building, it is not considered that this height would result in harm to the character and appearance of the host or neighbouring conservation area or streetscene as a result of the following design tools:
- i. The angular roof form and glazed treatment now proposed;
 - ii. The set back of roof form from either end of the building;
 - iii. The cornice and shoulder heights to the rebuilt masonry facades relative to the building on the corner of Great Queens Street and New London Theatre;
 - iv. The improved treatment to the rear elevation;
 - v. The recessed panel to the Parker street elevation to help to visually 'step down massing';
 - vi. Use of blind window and treatment of party wall to Drury Lane; and
 - vii. The overall facade treatment.

10.11 It is considered that the proposals will maintain the character and appearance of the Seven Dials conservation area and will deliver significant public benefit through the creation of additional jobs at the site and the introduction of publically accessible retail uses at the ground floor, animating and activating this corner and replacing the inactive and bland existing façade.

Views

10.12 A thorough assessment of the roofscape at the site and the surrounding area formed a foundational part of the design development for the scheme.

10.13 Views looking north along Drury Lane and west along Parker Street have been examined as part of the design evolution process.

10.14 In views along Drury Lane the building will remain intentionally subordinate in height and appearance within the context of the surrounding roofscape, thereby maintaining the playful character of the existing roofline and the extended height sits comfortably alongside the other neighbouring taller buildings.

10.15 In views along Parker Street from the west, the proposed building will make an appropriate contribution to the character of the street. This is demonstrated by the design tools mentioned at paragraph 10.10 of this Planning Statement and in the views shown in the DAS.

Conclusion

10.16 The surrounding environment has been carefully considered in the development of the proposals having regard for the relevant legislative framework.

10.17 The design of the proposal is consistent with the relevant national tests and regional and local policy requirements. The design meets the statutory tests of Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as it will preserve and enhance the character and appearance of the Seven Dials Conservation Area (LBC) and the Covent Garden Conservation Area (WCC).

10.18 This conclusion is supported by paragraphs 5.13-5.17 of the pre-application advice

(ref: 2018/0593/PRE) received on 4 January 2019.

11 Environment and Sustainability

- 11.1 The NPPF sets out the Government’s overarching planning policies regarding the delivery of sustainable development through the planning system. Chapter 14 of the document identifies the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 11.2 In accordance with national level objectives, the London Plan sets out the Mayor’s vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 11.3 In accordance with National level objectives, the London Plan sets out the Mayor’s vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 11.4 Policy 5.2 requires new development to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
- a. Be lean – use less energy;
 - b. Be clean - supply energy efficiently;
 - c. Be green – use renewable energy.
- 11.5 At a local level, through Local Plan Policy CC1 Camden requires all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 11.6 Local Plan Policy CC2 requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures.
- 11.7 Local Plan Policy CC2 also promotes the incorporation of sustainable design and

construction measures within developments.

- 11.8 In March 2019 LBC updated the Camden Planning Guidance ‘Energy Efficiency and Adaptation’ to ensure that the Council’s commitment to reducing carbon emissions is achieved.

Assessment

- 11.9 The proposals have been assessed against LP Policy 5.2 which requires new development to make the fullest contribution to minimising carbon dioxide emissions in accordance the energy hierarchy.
- 11.10 The Energy and Sustainable Design Statement, prepared by Kut, in support of this application outlines how the proposed development will achieve a 41.6% overall regulated CO2 reduction against 2013 Part L2B compliant baseline and 54.5% reduction against the existing building. The report demonstrates that the extension alone will achieve a 33.5% reduction in regulated CO2 emissions against 2013 Part L2A.

Be lean – Use Less Energy

- 11.11 The goals of ‘be lean’ will be met within the new development through the incorporation of the following:
- a. replaced windows;
 - b. high efficiency cooling;
 - c. ventilation system with high heat recovery and efficiency and low specification fan powers; and
 - d. lighting with high efficiency led luminaries with photoelectric control and presence detectors.

Be clean – supply energy efficiently

- 11.12 A connection to any heating infrastructure is not possible as part of the development proposals as there are no existing networks within connectable range of the scheme.

- 11.13 The heat demand of the proposed development is considered too low and too varied throughout the year to make the installation of a CHP feasible.
- 11.14 Although the scheme will not achieve an improvement in the “Be Clean “ stage of the energy hierarchy, provision will be made for a number of other sustainability aspects which will contribute in minimising the environmental impact of the development, both during construction and operation, by reducing the regulated energy demand:
- a. internal water consumption will be reduced by specification of water efficient fittings;
 - b. where possible, construction materials will be sourced from local producers and suppliers with environmental impact certification;
 - c. construction waste will be minimised; and
 - d. adequate internal and external storage of recycled and non-recycled waste will be ensured.

Be green – use renewable energy

- 11.15 The Energy and Sustainability Statement assesses the appropriateness of several renewable energy sources for inclusion within the proposed development.
- 11.16 Solar hot water system is considered not feasible due to low hot water demand for office type of building. Heat losses through storage and distribution pipework and energy for pumping would make the system much less efficient than some other (e.g. residential) buildings.
- 11.17 PV system has not been included as it is not necessary to comply with building regulations 2013 Part L2B. Specification of the proposed development including heat pumps and energy efficiency measures achieves results which meet and exceed all energy efficiency targets
- 11.18 Ground source heat pump has been ruled out as not technically feasible. It is extremely technically and economically demanding to create boreholes in existing buildings. Energy savings against air source heat pumps would be minimal.

- 11.19 Biofuels are ruled out due to negative impact on air quality, high running cost, delivery issues and environmental issues surrounding liquid biofuels as currently there are no established standards relating to the sustainability of biofuels.
- 11.20 Wind energy systems will not be considered due to high capital cost, negative visual effects, interference, flicker and noise risk, making them inappropriate for inclusion within this development.
- 11.21 Air source heat pumps are proposed to provide heating and cooling in the proposed building. Installation of new high efficiency VRF air source heat pump system will achieve a 5.9% reduction in regulated CO2 emissions compared to “Be Lean” baseline.
- 11.22 This reduction represents only the heating function of the heat pump as the heat pumps are considered a renewable energy source only when they are in heating mode (not cooling). The system will consist of roof positioned outdoor condensing units and indoor ceiling cassette fan coil units, i.e. air-to-air system. The indoor and outdoor units will be connected with a variable refrigerant flow pipework. By using this system it is considered that the development complies with the London Plan requirement to 'be green' and use renewable energy.

Conclusion

- 11.23 The proposed development will result in a highly efficient and sustainable office building with significant improvement against both the existing building and building regulations compliant baseline. All possible renewable and low carbon energy sources have been carefully considered. Air source heat pumps for space heating and cooling have been selected as the most appropriate renewable source for the development with no negative visual impacts, significant CO2 savings and optimal installation and maintenance cost, in line with the London Plan Policy 5.2 energy hierarchy and Camden Local Plan policies.
- 11.24 Therefore the proposals are compliant with national, regional and local planning policies CC1 and CC2 regarding energy and sustainability.

12 Amenity

- 12.1 This section assesses the proposals against policy relating to the amenity of nearby existing residents in terms of air quality, daylight and sunlight and overlooking.

Air Quality

Policy

- 12.2 London Plan Policy 7.4 requires that development proposals should be “at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as designated Air Quality Management Areas (AQMAs))”.
- 12.3 Local Plan Policy CC4 requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution.
- 12.4 Camden Planning Guidance 6 Amenity states that the Council’s overarching aim is for new development to be ‘air quality neutral’ and not lead to further deterioration of existing poor air quality.

Assessment

- 12.5 The Air Quality Assessment, prepared by Air Quality Consultants, describes the potential air quality impacts associated with the proposed refurbishment and development of the site. An assessment of construction dust impacts is also provided.

Construction Phase

- 12.6 The air quality impacts during the construction phase of the proposed development and sensitive receptors identified.
- 12.7 Measures to mitigate dust emissions will be required during the construction phase of the proposed development in order to minimise effects upon nearby sensitive receptors.

Operational Phase

- 12.8 The Air Quality Assessment has demonstrated that overall effect of traffic emissions on future users of the proposed development will be ‘not significant’. In addition, the increase in vehicle flows as a result of the proposed development will be minimal, and will therefore have a negligible impact on existing receptors. It is, therefore, not considered appropriate to propose further mitigation measures for this development.
- 12.9 The proposed development will be better than air quality neutral in terms of transport and buildings emissions. Thus, no mitigation is recommended.
- 12.10 The building and transport related emissions associated with the proposed redevelopment are both below the relevant benchmarks. The proposed redevelopment therefore complies with the requirement that all new developments in London should be at least air quality neutral.

Conclusion

- 12.11 Therefore the proposed development is compliant with regional Policy 7.4 and local Policy CC4 and CPG 6 in respect of air quality.

Daylight and Sunlight

Policy

- 12.12 The NPPF (paragraph 123) states that local planning authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 12.13 Local Plan Policy A1 seeks to manage the impact of development and protect the quality of life of occupiers and neighbours. The council will grant permission for development unless this causes unacceptable harm to amenity. Part (f) of the policy states that factors the council will consider in this assessment include “sunlight, daylight and overshadowing”. The supporting text, specifically paragraph 6.5,

advises that to assess whether acceptable levels of daylight and sunlight are available to habitable spaces, the Council will take into account the standards recommended in the British Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011). Camden Planning Guidance 6 supports Local Plan Policy A1.

Assessment

- 12.14 The daylight and sunlight affecting the proposed development and surrounding properties is considered within the Daylight and Sunlight Report, prepared by Point 2, submitted alongside this application.
- 12.15 A number of detailed assessments have been undertaken on the surrounding buildings that have habitable rooms/windows overlooking the site. This has been undertaken in accordance with the BRE report entitled 'Site layout planning for daylight and sunlight: A guide to good practice', more commonly known as 'The BRE Guidelines'.
- 12.16 The results demonstrate that the daylight and sunlight effects to the neighbouring residential properties are very good with a high level of compliance being achieved. Where there are recorded changes beyond the recommendations of the BRE Guidelines, these are mainly due to unusually low existing levels which are a product of high local obstruction. Overall, impacts will fall within the practical application of the BRE Guidelines.

Conclusion

- 12.17 Therefore in terms of sunlight and daylight, the proposed development accords with Local Plan Policy A1.

Noise

Policy

- 12.18 Paragraph 123 of the NPPF states that planning decisions should aim to avoid noise giving rise to significant adverse impacts on health and quality of life as a result of

new development.

12.19 Policy 7.15 of the London Plan states that development proposals should seek to reduce noise by:

- a. Minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals;
- b. Separate new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation;
- c. Promoting new technologies and improved practices to reduce noise at source.

12.20 Camden Local Plan Policy A4 seeks to ensure that noise and vibration from development is controlled and managed. Planning permission will only be granted for noise generating development where it can be operated without causing harm to amenity. Camden also seeks to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development through this policy.

12.21 Camden Planning Guidance Document 6 'Amenity' supports Local Plan Policy A4, setting out when planning applications must be supported by noise reports and what mitigation measures can be implemented to prevent harm to amenity being caused.

Assessment

12.22 A new climate control system will be installed as part of the proposed development which will require the installation of eight external condenser units (and the removal of existing plant equipment). The proposed condenser units will be arranged in louvered plant rooms located on the rear first floor terrace and at roof level.

12.23 The Environmental Noise Assessment, prepared by Acoustics Plus, submitted as part of this application has determined the existing background sound levels in the vicinity of the site and surrounding noise sensitive premises.

12.24 The nearest sensitive facades are the rear upper levels of properties located on Great Queen Street and Parker Street, notably 39 and 40- Great Queen Street and

8-24 Parker Street.

- 12.25 According to the Environmental Noise Assessment, prepared by Acoustic Plus, the proposals will comply with the LBC's noise threshold requirements, as set out in Appendix 3 of the Local Plan referenced in Policy A4.
- 12.26 In order to comply with the LBC's requirements it will be necessary to use acoustic attenuation kits. Furthermore, building edge diffraction is provided by screening the line of sight between the condenser units and the adjacent residential facades. This will occur due to the positioning of each plantroom and is mitigation provided by implementing considerate acoustic design.
- 12.27 It should also be noted that the proposed development will remove existing plant at both first floor and roof levels which is likely to improve the existing amenity of adjacent noise sensitive premises.
- 12.28 Given that the uses proposed at the site are in line with the existing use of the building and are in keeping with the character of the existing uses in the immediately surrounding area it is not considered that the proposed uses will cause harm to the existing amenity levels at the site. The hours of use of the flexible retail units will be conditioned as part of the planning permission.
- 12.29 In addition, Camden Local Plan Policy A4 acknowledges that deliveries associated with a development can lead to adverse noise impacts. The Transport Statement, prepared by Curtins demonstrates that the level of servicing and delivery activity associated with the development is anticipated to remain similar to the existing situation. Therefore it is not considered that an adverse noise impact will be felt as a result of the deliveries associated with the proposed development.
- 12.30 Therefore the proposed development will accord with planning policy at all levels in respect of noise and vibration.

13 Transport and Servicing

Transport

Policy

- 13.1 Paragraph 103 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.
- 13.2 Paragraph 148 of the NPPF states that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.
- 13.3 Further to this, paragraph 108 states that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- 13.4 At a regional level, London Plan Policy 6.3 states that “development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed”. The policy also indicates that transport assessments will be required in accordance with TfL’s Transport Assessment Best Practice guidance for major planning applications.
- 13.5 Policy 6.9 states that “the Mayor will work with all relevant partners to bring about a significant increase in cycling in London”.
- 13.6 Policy 6.10 indicates that “the Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasising the quality of the pedestrian environment, including the use of shared space principle promoting simplified streetscape, de-cluttering and access for all”.
- 13.7 The Mayor’s Transport Strategy (2010) sets out policies and proposals to achieve the goals set out in the LP providing a vision of London as an exemplary sustainable world city.
- 13.8 At a local level, Local Plan Policy T1 promotes sustainable transport by prioritising

walking, cycling and public transport in the borough.

- 13.9 Local Plan Policy T2 seeks to limit the availability of parking and require all new developments in the borough to be car-free.
- 13.10 To assess the overall implications of developments LBC, under policy T4, expects the submission of a Transport Assessment, Delivery and Servicing Management Plan and Construction Management Plan where the implications of proposals are significant.
- 13.11 On 15 March 2019 Camden adopted the 'Transport' CPG which provides information on all types of detailed transport issues within the borough including: assessing transport impact, travel plans, delivery and servicing plans and cycling facilities.

Assessment

- 13.12 The site is extremely well connected in terms of public transport with a PTAL rating of 6b (with 1a being the lowest accessibility and 6b being the highest accessibility). The site is within walking distance of Covent Garden underground station and is on the Piccadilly Line between Leicester Square and Holborn. The new proposed Crossrail station at Tottenham Court Road is 650m away on foot, and the site is served by 37 bus routes, with the closest bus stop being on Kingsway, 280m north.
- 13.13 The accompanying Transport Statement, prepared by Curtins, assesses the potential traffic, transport and highway implications associated with the occupation and use of the development proposals.
- 13.14 In accordance with the NPPF the proposed development is situated in a highly accessible location (PTAL 6b, the highest possible rating), thereby maximising the opportunities for sustainable transport modes to be used.
- 13.15 The proposals will incorporate the provision of 30 cycle spaces which is above the minimum standards required by the LP and represents an uplift of 27 spaces at the site, 22 of which will be long-stay secure spaces. The secure long-stay spaces will be provided in the form of two-tiered Josta cycle racks in a dedicated cycle parking

room, in response to paragraph 5.25 of the formal pre-application feedback received.

13.16 The site has no existing car parking spaces and the development has been designed to be car free and as result no car parking has been provided within the proposals, in line with Local Plan Policy T2.

13.17 The trip generation assessment estimates that the proposed development will generate an increase of 12 and 26 two-way trips during the AM and PM peak hours respectively. The Transport Assessment concludes that the increase in trip generation associated with the increased floorspace and introduction of more flexible retail uses at ground floor is negligible.

13.18 The Transport Statement demonstrates that the proposals can be accommodated within the existing traffic and transport infrastructure in the area surrounding the site. This is because the site is well served by public transport and there will be a negligible increase in person trips following the redevelopment of the site.

13.19 The Framework Travel Plan (FTP), prepared by Curtins, submitted in support of this planning application aims to:

- reduce the need to travel;
- discourage the use of unsustainable modes of transport and enable users of the site to make travel choices that benefit themselves and their community;
- maximise social inclusion by making the site accessible to all members of the community; and
- raise awareness of alternative modes of transport and thus encourage a modal shift towards more sustainable travel modes.

13.20 The FTP sets out various measures and initiatives that will be considered at the site to encourage sustainable modes of travel and reduce dependence on the private car. In addition, single occupancy vehicle trips will be discouraged. As the site is car free, the measures and initiatives focus on encouraging both greater use of public transport and active travel, such as walking and cycling. The measures and initiatives have been designed to assist in both the management of the FTP and promoting the use of sustainable modes of travel.

13.21 The measures and initiatives proposed aimed at reducing single occupancy car travel and encouraging sustainable forms of travel include:

- production of staff induction packs;
- measures to promote walking;
- measures to promote cycling;
- measures to promote public transport; and
- measures to promote operational related transport efficiencies.

13.22 To ensure that the FTP is followed a Travel Plan Co-ordinator (TCP) will engage with occupiers to promote the Travel Plan. An Implementation Plan is included at Table 6.1 of the FTP to explain the management structure for the FTP, the responsibility and the implementation of stated measures and initiatives, monitoring procedures and promotion of the FTP.

Conclusion

13.23 The proposed development will promote sustainable transport through the increase in provision of cycle parking at the site by 27 spaces in line with Local Plan Policy T1 and will be car-free.

13.24 The proposals have been shown to comply with national, regional and local transport planning policy. The impact of the proposed development once operational is acceptable in transport terms.

Servicing

Policy

13.25 At a national level, paragraph 35 of the NPPF states that developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies.

13.26 Local Plan Policy CC5 'Waste' seeks to make Camden a 'low waste' borough. In order to achieve this, the council requires developments to include facilities for the storage and collection of waste and recycling.

Assessment

- 13.27 The Transport Statement, prepared by Curtins, demonstrates that the servicing and deliveries at the proposed development will be managed to ensure that their impacts are minimised. Goods and refuse will continue to be undertaken on-street and in dedicated loading bays on Parker Street and Drury Lane as per the existing arrangement.
- 13.28 The only vehicular movements generated by the Proposed Development will relate to delivery and service vehicles movements.
- 13.29 The estimated number of delivery vehicles generated as a result of the Proposed Development and the net increase in service vehicle movements has been calculated at eight two way trips per day which equates to one additional vehicle per day over the existing trip levels.
- 13.30 The additional servicing trip will be accommodated on-street and via existing dedicating loading bays.
- 13.31 The service vehicle forecast shown above indicates that the proposed development will result in a single additional service vehicle per day, resulting in a negligible increase of one in peak hour movements.
- 13.32 On the basis of the servicing trip generation presented above, the proposed development will not materially impact on the capacity of loading areas in the vicinity of the site.

Conclusion

- 13.33 Therefore the proposals are fully compliant with both national and local planning policy in terms of servicing.

Construction Traffic Management

Policy

- 13.34 Local Plan Policy T4 seeks to minimise the impact of the movement of goods and

materials by road. In order to achieve this LBC will:

- a) encourage the movement of goods and materials by canal, rail and bicycle where possible;
- b) protect existing facilities for waterborne and rail freight traffic and;
- c) promote the provision and use of freight consolidation facilities.

13.35 Moreover, Paragraphs 10.34 and 10.35 set out the roads that heavy goods are expected to be transported along and suggests that the impact of goods vehicles can be reduced where a loading and unloading bay is included within a development, particularly where the bay can be enclosed. Developments should therefore incorporate space within the site for goods vehicles.

Assessment

13.36 The supporting draft Construction Management Plan (CMP), prepared by BTP, submitted with this application follows the LBC's pro forma.

13.37 The draft CMP confirms that the site is not to be accessed by vehicles and that all deliveries and/or waste removals are to occur 'off the road'.

13.38 In line with Camden 'workplans', the proposed working hours during the construction period are:

- 8am – 6pm: Mondays-Fridays; and
- 8am – 1pm: Saturdays.

13.39 A monthly community liaison group will be organised for the local community to attend and meet with the project team to discuss the construction works and any issues they may have.

13.40 Therefore the proposed development will be conducted in a manner that accords with local planning policy requirements.

14 Planning Obligations

- 14.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 14.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, as amended, and paragraph 204 of the NPPF, a planning obligation should only be sought where they meet all of the following tests:
- a) Necessary to make the proposed development acceptable in planning terms;
 - b) Directly related to the proposed development; and
 - c) Fairly and reasonably related in scale and kind to the proposed development.
- 14.3 Paragraph 54 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 14.4 Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects (Paragraph 55 NPPF).
- 14.5 Under Policy 8.2 of the LP 'Planning Obligations', boroughs should include appropriate strategic as well as local needs in their policies for planning obligations.
- 14.6 Policy 8.2 states that negotiations should seek a contribution towards the full cost of all such provision that is fairly and reasonably related in scale and kind to the proposed development and its impact on a wider area.
- 14.7 As set out in Camden Planning Guidance 'Developer Contributions', the use of

planning obligations is an important tool in managing the impacts of development and assisting the delivery of necessary infrastructure to support Camden's and London's current and future needs to meet the strategic objectives of the Local Plan.

- 14.8 The use of planning obligations is specifically required through Local Plan policy DM1 'delivering and monitoring' although a whole range of individual development policies may be used to justify an obligation.
- 14.9 Local Plan Policy DM1 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to; support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and mitigate the impact of development.
- 14.10 Based on the formal pre-application advice received, dated 4 January 2019, the anticipated planning obligations for this development are:
- Financial contribution in lieu of residential provision;
 - Car free for commercial premises;
 - Construction management plan (plus monitoring fee);
 - Energy/Sustainability Statement;
 - Highways contribution for any necessary highway works; and
 - Travel plan (plus monitoring fee).

Community Infrastructure Levy (CIL)

- 14.11 LBC adopted its Community Infrastructure Levy in April 2015.
- 14.12 The site is located within CIL Charging Zone A (Central). Therefore the development will be liable to pay the following:
- Office - £45/sqm
 - Retail (including bar/restaurant/entertainment and other town centre uses) - £25 (not relevant as uses have been applied for flexibly with Class B1 use, therefore the CIL liability has been calculated on a 'worst case' of £45/sqm).

14.13 MCIL2 came into effect on 1 April 2019.

14.14 A completed CIL form has been submitted with this application.

15 Summary and Conclusions

- 15.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 15.2 This Planning Statement has assessed the proposals against the development plan and other relevant planning policy and guidance at national, regional and local policy level.
- 15.3 The proposed development has been subject to thorough pre-application discussion with local residents, businesses, Camden officers and the Camden DRP. The applicant has sought at all times to consider and incorporate responses received.
- 15.4 The application presents an exciting opportunity to deliver a building of the highest architectural quality which meets the statutory tests in terms of protecting the historic built environment and which provides efficient fit-for-purpose modern office floorspace to meet market day demand, whilst contributing to improving the public realm by activating existing 'dead' frontages along a key Central London thoroughfare.
- 15.5 The proposals have been developed to reflect and respect the surrounding conservation area and the typical scale of the surrounding buildings and will deliver the following public benefits:
- i. A contribution to the regeneration and transformation of the area;
 - ii. Sustainable reuse and regeneration of a building which no longer meets modern office user requirements;
 - iii. Delivering an uplift of 344 sqm (GIA) in high quality business floorspace and a total of 412sqm (GIA) that will contribute to sustainable economic development;
 - iv. Delivering sustainable development through improvements in energy efficiency;
 - v. High quality design, contributing to the wider townscape and conservation area setting and local streetscene; and
 - vi. Contributing to the function and character of the area through the provision of

new active public uses at ground floor level to reactivate street frontages.

- 15.6 The proposal demonstrates that it satisfies and exceeds planning policies at national, regional and local levels.
- 15.7 The application accords with national, regional and local policy objectives to deliver sustainable, mixed use and balanced communities and should therefore be approved.



GERALDEVE

160-161 Drury Lane, London, WC2B 5QG
Planning History

Reference No.	Address	Type of Application	Description	Decision	Date of Decision
2015/4606/TC	Abokado 160 Drury Lane London WC2B 5PN	Tables and Chairs	2 Tables and 4 Chairs Monday to Friday: 08.00 to 18:30 Renewal Application	Approved	11-08-2015
2014/6839/NEW	161 Drury Lane London WC2B 5PN	Advertisement Consent	Display of estate agent's board.	Withdrawn	
2014/4897/TC	Abokado 160 Drury Lane London WC2B 5PN	Tables and Chairs	2 Tables, 4 Chairs Monday to Friday: 07:30 to 18:30 Renewal Application	Approved	29-07-2014
2013/4504/TC	Abokado 160 Drury Lane London WC2B 5PN	Tables and Chairs	2 Tables, 4 Chairs and 2 Barriers Monday to Friday: 08:00 to 20:00 Renewal only	Approved	17-07-2013
2013/0139/TC	Abokado 160 Drury Lane London WC2B 5PN	Tables and Chairs	2 Tables, 4 Chairs and 2 Barriers Monday to Friday: 08:00 to 20:00 Renewal only	Approved	09-01-2013
2011/1220/TC	Abokado 160 Drury Lane London WC2B 5PN	Tables and Chairs	2 Tables, 4 Chairs and 2 Barriers Monday to Friday: 08:00 to 20:00 Renewal only	Approved	14-06-2011
2010/0472/TC	Abokado 160 Drury Lane London WC2B	Tables and Chairs	2x tables and 4x chairs, and 2 barriers 08:00 to 20:00 Monday to Friday (New Application)	Approved	27-01-2010

	5PN				
2008/1297/P	160-161 Drury Lane London WC2B 5QG	Full Planning Permission	Alterations to the shopfront, including the relocation of entrance door to corner of Drury Lane and Parker Street.	Approved	21-05-2008
2007/5484/P	161 Drury Lane London WC2B 5QG	Full Planning Permission	Alterations to shopfront, including extension to front facades in front of existing pillars and with a new glazed design and relocation of entrance door to corner of Drury Lane and Parker Street.	Refused	20-12-2007
2006/2328/P	160-161 Drury Lane London WC2B 5QG	Full Planning Permission	Installation of heat pump air conditioning unit on roof at rear first floor level.	Approved	14-07-2006
PS9904982	160-161 DRURY LANE LONDON WC2B5QG	Full Planning Permission	Variation to condition 3 of planning permission Ref PS9804574 dated 15th March 1999, such as to permit 24 hour use of one of four air conditioning units on the first floor roof terrace, as shown by drawing numbers 3508/1, 3508/2 and 2 page plant specification and letter dated 23rd December 1999.	Refused	08-02-2000
PS9804574	160-161 Drury Lane, WC2	Full Planning Permission	Retention of eleven air-conditioning units on the first floor balcony, fourth floor balcony, and the roof-top plant room on the rear elevation, as shown on drawing numbers 3508/2A, /3A, /5A, /6A, 5770/02 and /05.	Approved	

8701960	2-24 Parker Street & 158-161 Drury Lane WC1	Councils Own Approval of Details	Approval of details pursuant to conditions 01 02 and 03 of permission dated 18th February 1985 ref:36129/R2.	Approved	07-10-1987
8601348	2-24 Parker Street & 158-161 Drury Lane WC1	Councils Own Approval of Details	Submission of details of building materials to be used in the redevelopment of the site for office residential light industrial and retail use. *(REVISED Plans submitted).	Approved	26-02-1987
P14/35/E/36129	4-24 Parker Street & 160-161 Drury Lane, WC2	Historic Planning Application	Redevelopment of the site by the erection of a new building comprising basement, ground and 4 storeys to provide residential, offices, retail, light industry and integral garages.	Conditional	18-02-1985
P14/35/E/3180	4-24 Parker Street & 160-161 Drury Lane, WC2	Listed Building Consent	Demolition of 160-161 Drury Lane.	Conditional	18-02-1985
8402045	4-24 Parker Street and 160 Drury Lane WC2		Renewal of the permission granted by Secretary of States letter dated 22nd January 1982 for redevelopment of the vacant site to provide 9.978 sq.ft. of offices 13.413 sq.ft. of residential and 452 sq.ft. of retail (in outline).	Grant Full or Outline Perm. with Condit.	06-02-1985
P14/35/E/30685	Site of 2-24 Parker Street and 160 Drury Lane, WC2	Historic Planning Application	Redevelopment by the erection of a part 4/5-storey development on Parker Street and a 4-storey development at 160 Drury Lane to provide 1,150 sq. metres residential (20 flats), 525 sq. metres office, 700 sq. metres retail, and 75 sq. metres storage accommodation.	Conditional	07-08-1980
P14/35/E/2466	160 Drury Lane,	Listed Building	Demolition	Approved	07-08-1980

	WC2	Consent			
P14/35/E/28900	4-20 Parker Street and 160 Drury Lane, WC2	Historic Planning Application	Redevelopment of the site by the erection of a ground and three-storey building for offices and residential use.	Refused	05-10-1979
P14/35/E/23720	4-20 Parker Street and 160 Drury Lane, W.C.2.	Historic Planning Application	Redevelopment to provide shops, restaurant and workshop on the ground floor, offices on the 1st and 2nd floors and 16 residential flats on the 3rd and 4th floors.	Refused	11-02-1977
CA1888/1964	161 Drury Lane, W.C.2	Historic Planning Application	To the display of a double sided box sign, with internal static illumination on the northern pilaster of the shopfront at 161 Drury Lane, W.C.2.	Approved	17-02-1964
CA1254/1965	161 Drury Lane, W.C.2	Historic Planning Application	To the erection of an illuminated overhanging box sign advertising "Players Gigarettes" at 161 Drury Lane, W.C.2.	Approved	21-07-1960

