

# **13 Fitzroy Street Planning Statement**

**Final**

Workspace Group Plc

April 2019

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1.0

## Introduction

1.1

This Planning Statement has been prepared on behalf of Workspace Group Plc (“Workspace”) to accompany an application for full planning permission for extension and external alterations to No. 13 Fitzroy Street, London Borough of Camden (LB Camden). The description of development is as follows:

*“Construction of a two-storey rooftop extension to Block B to create additional B1 floorspace, reconfiguration of the existing main entrance and atrium and external façade alterations, alongside creation of a roof terrace and rationalisation and replacement of rooftop plant.”*

1.2

No. 13 Fitzroy Street comprises an existing B1 office block located on the corner of Fitzroy Street and Howland Street. Originally constructed in the 1960s, the building represented the first stage of a major refurbishment project to consolidate the multi-national engineering firm Arup’s properties into one larger campus at the heart of Fitzrovia. The site is still occupied by Arup, who use the building as their headquarters but are set to vacate the building in 2022 to move to new accommodation.

1.3

The applicant, Workspace, is seeking to increase the amount of office floorspace within the building through construction of a rooftop extension at Block B and improve the quality of the building through reconfiguration of the entrance and atrium (to improve accessibility) and creation of an ancillary café at the heart of the building which will assist with business interaction and provide breakout space for informal meetings.

1.4

The proposed development will add to Workspace’s fast-growing network of creative co-working space that enables small businesses to work alongside one another within an entrepreneurial environment. The Workspace model also comprises ancillary café space that provides an animated hub that further encourages the exchange of knowledge and ideas.

1.5

Established in 1987, and listed on the London Stock Exchange since 1993, Workspace owns and manages 3.9 million sq. ft. of business space across 65 London properties. Their spaces are home to thousands of businesses including some of London’s fastest growing and established brands across a wide range of sectors.

1.6

Workspace is geared towards helping businesses perform at their very best. The Workspace Advantage is the unique customer offer and openness to all - they provide inspiring, flexible work spaces with super-fast technology in dynamic London locations. The way businesses work is changing. That’s why Workspace continually invests in providing the technology infrastructure that enables customers to think and move fast and, alongside their working environment, is tailored to each individual business. Workspace is a FTSE 250 listed Real Estate Investment Trust and a member of the European Public Real Estate Association.

## Accompanying Documents

1.7

This Planning Statement should be read alongside the following documents:

- 1 Application form and certificates;
- 2 CIL Additional Information Requirements Form;
- 3 Application Covering Letter, prepared by Lichfields;
- 4 Application drawings, prepared by Squire & Partners;
- 5 Planning Statement, prepared by Lichfields;
- 6 Design and Access Statement (including Sustainability), prepared by Squire & Partners;

- 7 Daylight & Sunlight Report, prepared by Waldrams;
- 8 Transport Statement, prepared by Caneparo Associates;
- 9 Outline Travel Plan, prepared by Caneparo Associates;
- 10 Noise Impact Assessment, prepared by Arup; and
- 11 Economic Benefits Assessment, prepared by Lichfields.

## Report Structure

1.8 This Planning Statement comprises the following chapters:

- **Section 2:** Background and context, including a description of the site and surrounding area and, summary of relevant planning history and details of pre-application consultation;
- **Section 3:** Details of the proposed development;
- **Section 4:** A summary of the planning policy context;
- **Section 5:** An appraisal of the main policy considerations relating to the proposed development; and
- **Section 6:** Concluding comments.

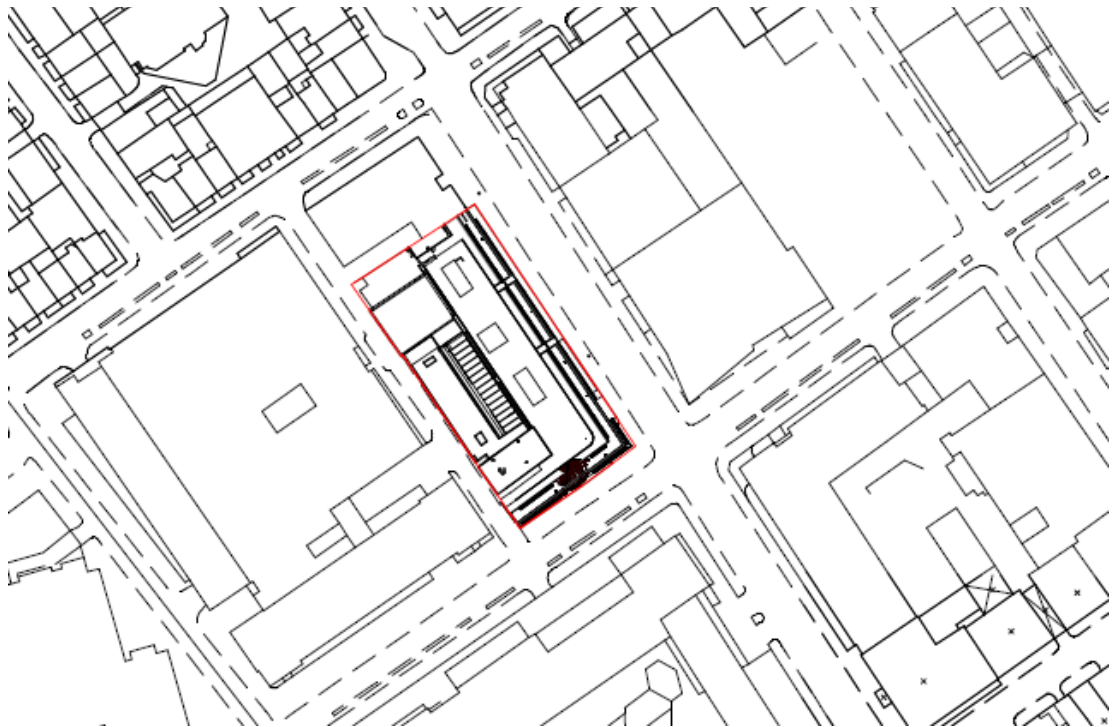
## 2.0 Site Background and Context

### Site and Context

- 2.1 No. 13 Fitzroy Street comprises a block of c. 0.22 hectares located at the centre of the Fitzrovia district and within the London Borough of Camden.

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Figure 2.1 Site location plan



Source: Squire & Partners

- 2.2 Originally constructed in the 1960s, the building represented the first stage of a major refurbishment project to consolidate multi-national engineering firm Arup's properties into one larger campus at the heart of Fitzrovia. The site is still occupied by Arup, who use the building as their headquarters.
- 2.3 Located to the south of Fitzroy Square, the site itself is bounded by the key roads of Fitzroy Street and Howland Street to the east and south, respectively. It is also bordered by Cleveland Mews to the west and The BT tower to the east and Maple Street to the north.
- 2.4 While the site is not itself located within a Conservation Area, it is surrounded on four sides by neighbouring Conservation Areas. The Fitzroy Square Conservation Area lies to the north with the Charlotte Street Conservation Area to the south. The Bloomsbury and East Marylebone Conservation Areas are located to the east and west, respectively.
- 2.5 The Grade II listed BT Tower is located directly to the west of the site across Cleveland Mews. There are also a number of Grade II listed Georgian townhouses within the Fitzroy Square Conservation Area to the north, however the location of the site and nature of surrounding buildings means that the site does not fall within the setting of these buildings.
- 2.6 The site is located within the extent of the London View Management Framework (LVMF) Parliament Hill Panorama View 2a.

- 2.7 The site has a PTAL of 6b, representing the highest level of access to public transport services. Goodge Street Underground Station is located approximately 380m to the southeast of the Site and can be accessed from Tottenham Court Road. The station offers direct access to the Northern Line which runs a frequent service between Edgware and Morden. The site is also located within a 20-minute walking distance of both Euston Station and Kings Cross St Pancras Station, offering major regional, national and international transport hubs. The nearest bus stop (Goodge Street, Stop A) is located approximately 300m to the south of the site.
- 2.8 Vehicular access is provided via Cleveland Mews to a lower ground level with parking provision for ten cars alongside a cycle store. The building is currently serviced via a loading bay and service yard also accessed via Cleveland Mews.

## **Planning History**

- 2.9 Planning permission for the existing building was granted in 1951, comprising a basement and seven floors for B1 office use. In 1959, planning permission was approved for the erection of a boundary wall.
- 2.10 In 2001, an application was approved for the extension and external alteration of 8 and 13 Fitzroy Street, 36 Howland Street and 9-18 Maple Place (ref. PSX0104058). The facades to Fitzroy Street, Howland Street and Clevedon Mews were removed and replaced with a new glazed façade, while a new feature ‘window’ extending through all floors was added to the Howland Street elevation to serve as a communal meeting area for the building.
- 2.11 The existing internal courtyard was infilled to allow for expansion of the open plan office floorplate. A limited amount of car parking spaces (to accommodate ten cars) was also created at basement level.
- 2.12 The most recent application relating to the site was approved in 2005 for the installation of a canopy adjacent to the lower ground floor loading bay (ref. 2005/0776/P).

## **Pre-Application Consultation**

- 2.13 Formal pre-application consultation with LB Camden has been undertaken, including a meeting with Council Officers.
- 2.14 The pre-application discussions have informed the design and content of the emerging proposals. Further details with respect to the design evolution are contained within the Design and Access Statement.



## 3.0 Proposed Development

3.1 Planning permission is sought for creation of additional B1 office floorspace via a two-storey extension of Block B, reconfiguration of the entrance and atrium, and external façade alterations, alongside creation of a roof terrace and rationalisation of rooftop building services plant.

3.2 While the applicant is seeking to undertake internal refurbishments, these works do not form part of this planning application. The internal layouts included within the application drawings are therefore provided for indicative purposes only.

3.3 The proposed development comprises:

### **Rooftop Extension to Block B**

3.4 The proposed two-storey extension to Block B of the existing building will provide 428 sqm (GIA) B1 floorspace.

3.5 The design of the proposed extension takes cues from both the existing façade of Block B and will be primarily composed of composite rainscreen cladding panels.

### **Entrance Reconfiguration and Creation of Ancillary Café**

3.6 The main entrance to 13 Fitzroy Street is proposed to be relocated further north and lowered to street level for increased accessibility. Occupiers of the building will then access the respective floors from the enhanced atrium at lower ground floor level.

3.7 An ancillary café is to be created at lower ground floor level, accessed directly via the main Fitzroy Street entrance.

3.8 As outlined in the accompanying Design and Access Statement, reconfigurations to the ground and lower ground floors will lead to a loss of B1 office floorspace and so the proposed development will lead to a net gain of 197 sqm (GIA) additional B1 floorspace, as set out in Table 3.1 below.

Table 3.1 Floorspace gain vs. floorspace loss

Floorspace Gain (sqm GIA)	Floorspace Loss (Sqm GIA)	Floorspace Uplift (Sqm GIA)
487 sqm	290 sqm	197 sqm

3.9 An external roof terrace serving the office floorspace is proposed to the corner of Fitzroy Street and Howland Street through adaptation of the existing maintenance gantry. In order to create access, the existing Core 1 will be extended to meet the sixth-floor façade line. The proposed additional massing will be stepped back and clad to match the façade and so minimise visual impact at street level.

3.10 The existing rooftop building services plant is proposed to be replaced and upgraded. The plant will continue to operate as existing during working hours (between 07:00 and 18:00 hours) and will have the same availability for night-time and weekends.

## 4.0 Planning Policy and Guidance

- 4.1 A full policy review has been undertaken as part of the preparation of this application and key policy considerations are identified in Table 4.1 below. An assessment of the proposed development's alignment to the key policies is set out in Section 5.

### National Planning Policy Framework

- 4.2 The National Planning Policy Framework (NPPF), published in February 2019, states that there must be a presumption in favour of sustainable development.
- 4.3 Chapter 6 of the NPPF requires planning decisions to *"help create the conditions in which businesses can invest, expand and adapt"* and specifies that *"significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development"* (paragraph 80).
- 4.4 Chapter 11 seeks to ensure that use of previously developed land is maximised and that planning decisions *"promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively..."* (paragraph 118).
- 4.5 Chapter 16 specifies that *"when considering the impact of a proposed development of a designated heritage asset, great weight should be given to the asset's conservation..."* (paragraph 193) and confirms that *"where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use"*. (paragraph 196).
- 4.6 The following NPPF Chapters are of direct relevance to the proposed development:
- Chapter 6: Building a strong, competitive economy
  - Chapter 7: Ensuring the vitality of town centres
  - Chapter 8: Promoting healthy and safe communities
  - Chapter 11: Making effective use of land
  - Chapter 12: Achieving well-designed places
  - Chapter 14: Meeting the challenge of climate change, flooding and coastal change
  - Chapter 16: Conserving and enhancing the historic environment

### Statutory Development Plan

- 4.7 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise. At the present time, the Statutory Development Plan comprises:
- a The London Plan (Adopted 2016);
  - b The London Borough of Camden Local Plan (adopted 2017); and
  - c The London Borough of Camden Site Allocations Plan (Adopted 2013).
- 4.8 The National Planning Policy Framework (2019); National Planning Policy Guidance [NPPG], the various Supplementary Planning Guidance Documents prepared by the GLA and LBS are material considerations.

- 4.9 Within the Development Plan, the site is subject to the following planning designations:

### **The London Plan**

- 1 London Plan Central Activities Zone (CAZ)
- 2 London View Management Framework (LVMF) Parliament Hill Panorama View 2a

### **Camden Local Plan**

- 1 Central London Area
- 2 Fitzrovia and Bloomsbury

### **Camden Site Allocations Plan**

- 4.10 While the site is not specifically allocated within the Camden Site Allocations Plan (September 2013), it falls within the Central London Area within which development is required to contribute towards London's economic, social and cultural role while meeting the needs of local residents and respecting their quality of life.

## **Emerging Planning Policy**

### **Draft New London Plan**

- 4.11 The draft New London Plan (August 2018) was consulted on between 1 December and 2 March 2018, with minor suggested changes published in August 2018. The Examination in Public (EiP) commenced on 15 January 2019, with adoption targeted for Spring 2020. Given this represents an early stage of the review, some material weight may be given to the draft policies when determining this application.
- 4.12 Draft Policy E1 (Offices) states that the provision of high quality office space suitable for businesses of varying sizes should be supported by new build, refurbishment and mixed-use development. Meanwhile Draft Policy E2 (Low-cost business space) introduces stronger support for the provision of low-cost B1 business workspace, recognising its role in supporting the needs of micro, small and medium-sized enterprises.
- 4.13 Draft Policy SD4 (The Central Activities Zone (CAZ)) seeks to reinforce the significant office functions of the CAZ, specifying that office provision should be supported and enhanced, including the intensification and provision of sufficient space for a range of types and sizes of occupier and rental values.

## **Other Material Considerations**

- 4.14 In addition to the Statutory Development Plan and emerging draft policy, the following documents are considered relevant and material in determining its application:

### **National Guidance**

- 1 NPPF (CLG, February 2019)
- 2 Planning Practice Guidance ('PPG') (CLG; 2014, 2017, 2018 and 2019)

### **Regional Guidance**

- 1 Accessible London - Achieving an Inclusive Environment SPG (2014)
- 2 Central Activities Zone SPG (2016)
- 3 Character and Context SPG (2014)

- 4 Crossrail Funding SPG (2016)
- 5 London View Management Framework SPG (2012)
- 6 Planning for Equality and Diversity in London SPG (2007)
- 7 Sustainable Design and Construction SPG (2014)
- 8 The Control of Dust and Emissions During Construction and Demolition SPG (2014)

### Local Guidance

- 1 CPG Access for All (March 2019)
- 2 CPG Design (March 2019)
- 3 CPG Energy Efficiency and Adaptation (March 2019)
- 4 CPG Transport (March 2019)
- 5 CPG Water and Flooding (March 2019)
- 6 CPG Amenity (March 2018)
- 7 CPG Employment Sites and Business Premises (March 2018)

### Planning Policy and Guidance Framework

4.15

Table 4.1 below identifies the key policies and guidance relevant to the proposed development.

Table 4.1 Planning policy and guidance framework

Key Consideration	NPPF (2019)	The London Plan (2016)	New Draft London Plan (2018)	Camden Local Plan (2017)	Other Material Considerations
Principle of Development	Chapter 6: Building a strong, competitive economy	Policy 2.10 - CAZ: strategic priorities Policy 2.11 - CAZ: strategic functions Policy 4.2 - Offices	Policy E8 - Sector growth opportunities and clusters Policy SD4 - The Central Activities Zone (CAZ) Policy E1 – Offices Policy E2 – Low-cost business space Policy E3 - Affordable Workspace	Policy G1 – Delivery and location of growth Policy E1 – Economic development	Central Activities Zone SPG (2016)  Employment Sites and Business Premises CPG (2018)
Employment and Economic Benefits	Chapter 6: Building a strong, competitive economy	Policy 2.10 - CAZ: strategic priorities Policy 2.11 - CAZ: strategic functions Policy 2.13 - Opportunity areas and intensification areas Policy 3.4 - Optimising housing potential Policy 4.2 - Offices Policy 4.3 - Mixed Use Development and Offices	Policy E1 – Offices Policy E2 – Low-cost business space Policy E3 - Affordable Workspace Policy SD4 - The Central Activities Zone (CAZ)	Policy E1 – Economic development Policy E2 – Employment premises and sites	Central Activities Zone SPG (2016)  Employment Sites and Business Premises CPG (2018)

Key Consideration	NPPF (2019)	The London Plan (2016)	New Draft London Plan (2018)	Camden Local Plan (2017)	Other Material Considerations
Heritage	Chapter 12: Conserving and enhancing the historic environment  Chapter 12: Achieving well-designed places	Policy 7.8 - Heritage assets and archaeology Policy 7.11 - LVMF Policy 7.12 - Implementing the LVMF	Policy HC1 - Heritage Conservation and Growth Policy HC3 – Strategic and Local Views Policy HC4 – London View Management Framework Policy GG5 - Growing a good economy	Policy D1 – Design  Policy D2 - Heritage	London View Management Framework (LVMF) SPG (2012)  Design CPG (2019)
Design	Chapter 12: Achieving well-designed places	Policy 3.5 - Quality and design of housing developments Policy 7.4 - Local Character Policy 7.5 - Public Realm Policy 7.6 - Architecture Policy 7.7 - Location and design of tall and large buildings	Policy D1 – London's form and characteristics Policy D2 - Delivering good design Policy D3 - Inclusive Design	Policy D1 - Design	Character and Context SPG (June 2014)  Accessible London: Achieving an Inclusive Environment SPG (2014)  Design CPG (2019)  Access for All CPG (2019)
Transport, Servicing and Parking	Chapter 9: Promoting Sustainable Transport	Policy 6.3 - Assessing effects of development on transport capacity Policy 6.7 - Better streets and surface transport Policy 6.9 - Cycling Policy 6.10 - Walking Policy 6.13 - Parking	Policy T2 – Healthy Streets Policy T3 - Transport capacity, connectivity and safeguarding Policy T4 – Assessing and mitigating transport impacts Policy T5 - Cycling Policy T6 - Car Parking Policy T6.2 - Office parking Policy T7 – Freight and servicing	Policy T1 – Prioritising walking, cycling and public transport  Policy T2 – Parking and car-free development  Policy T3 – Transport infrastructure	Accessible London - Achieving an Inclusive Environment SPG (2014)  Planning for Equality and Diversity in London SPG (2007)  Transport CPG (2019)
Energy and Sustainability	Chapter 15: Conserving and Enhancing the Natural Environment	Policy 5.3 - Sustainable Design and Construction Policy 5.7 - Renewable Energy	Policy SI2 – Minimising greenhouse gas emissions SI3 - Energy Infrastructure GG6 - Increasing efficiency and resilience	Policy CC1 – Climate change mitigation  Policy CC2 – Adapting to climate change  Policy CC3 – Water and flooding	Sustainability CPG3 (2015, updated 2018)  Energy efficiency and adaptation CPG (2019)
Amenity including	Chapter 7: Requiring	Policy 7.16 - Architecture	Policy D1 – London's form and	Policy A1 – Managing the	Amenity CPG6 (2011, updated

Key Consideration	NPPF (2019)	The London Plan (2016)	New Draft London Plan (2018)	Camden Local Plan (2017)	Other Material Considerations
Daylight and Sunlight	Good Design		characteristics Policy D2 – Delivering good design	impact of development	2018)
Noise	Chapter 7: Requiring Good Design	Policy 7.15 - Reducing and managing noise	Policy D13 - Noise	Policy A3 – Noise and vibration	Amenity CPG6 (2011, updated 2018)
Waste and Recycling	-	Policy 5.16 – Waste net self-sufficiency Policy 5.17 – Waste capacity Policy 5.18 – Construction, excavation and demolition waste	Policy SI7 – Reducing waste and supporting the circular economy Policy SI8 – Waste capacity and net waste self-sufficiency	Policy CC5 - Waste	Design CPG (2019)
Water and Flood Risk	Chapter 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change	Policy 5.12 - Flood Risk Management Policy 5.13 - Sustainable drainage Policy 5.15 – Water use and supplies	Policy SI12 - Flood Risk Management	Policy CC3 – Water and Flooding	Water and Flooding CPG (2019)

5.0

## Assessment of Proposed Development

### Principle of Development

- 5.1 The NPPF promotes the efficient use of land and requires as much use as possible to be made of previously-developed land (Para. 117).
- 5.2 London Plan Policy 4.1 seeks to promote and enable the continued development of a strong, sustainable and diverse economy across London, with Policy 2.10 specifically identifying the CAZ as a key location in which a rich mixture of both local and strategic uses should be supported. With regard to B1 office floorspace specifically, Policy 2.10 seeks to ensure that provision is made for a range of occupier types. Reflecting the London-wide policy approach, Local Plan Policy G1 seeks to direct growth towards highly accessible locations, especially within Central London, and promotes the most efficient use of brownfield land and existing buildings across LB Camden.
- 5.3 This is reflected in the CAZ SPG (Table 1.1) and draft new London Plan (Policy SD5c) which affords *greater weight to offices and other CAZ strategic functions* relative to new residential development within the commercial areas of Fitzrovia. Whilst the Fitzrovia commercial areas are not specifically defined, Fitzroy Street and the surrounding locality is heavily dominated by large-scale commercial buildings and should therefore be considered a commercial area.
- 5.4 At the Borough level, Local Plan Policy E1 seeks to secure a successful and inclusive economy across LB Camden through creating the conditions required for economic growth whilst harnessing the benefits for local businesses and residents. The Council commits to meeting the Borough's objectively assessed need of an additional 695,000 sqm of office floorspace by 2031, especially through directing new office development to the growth areas, Central London and town centre locations. The policy also commits to maintaining a stock of premises that are suitable for a variety of business activities and available on a range of terms and conditions to accommodate firms with varying resource availability.
- 5.5 Policy E2 further the local approach to supporting a successful economy, specifying that the level of employment floorspace across the Borough will be increased or at least maintained. Meanwhile, sites that are suitable for continued business use, in particular small business premises, businesses and services that provided employment for Camden residents, and those that support the function of the CAZ or local economy will be protected.
- 5.6 It is recognised that LB Camden is also seeking to maximise housing supply across the Borough, in line with the priority land-use of the Plan as set out in Policy H1. This is supported by Policy H2, which specifies that the Council will promote the inclusion of self-contained homes. Policy H2 also states that the Council will require proposals for additional non-residential floorspace exceeding 200 sqm (GIA) to provide 50% of the additional floorspace as self-contained housing within the Central London Area and town centres.
- 5.7 In line with the above policy approach, the proposed development will both increase and enhance the existing office provision at a highly accessible Central London location and contribute towards the Borough's objectively assessed need for 695,000 sqm additional office floorspace to 2031. Reflecting both London-wide and local policy, the proposals will also provide low-cost, flexible floorspace to support the needs of start-up and small and medium-sized enterprises (SMEs).
- 5.8 While the proposals comprise a gross floorspace gain of 487 sqm (GIA), the reconfigured atrium and lowered entrance level will result in a corresponding floorspace loss of 290 sqm (GIA). The net floorspace uplift will therefore equate to 197 sqm (GIA), as set out in Table 5.1.

Table 5.1 Net floorspace uplift

Floor	Floorspace gain (Sqm GIA)	Floorspace loss (Sqm GIA)	Floorspace Change (Sqm GIA)
Roof	7 sqm	-	+7 sqm
6	7 sqm	-	+7 sqm
5	-	-	-
4	230 sqm	-	+230 sqm
3	198 sqm	-	+198 sqm
2	-	-	-
1	-	-	-
Ground floor	45 sqm	180 sqm	-135 sqm
Lower ground floor	-	110 sqm	-110 sqm
<b>Total</b>	<b>487 sqm</b>	<b>290 sqm</b>	<b>+197 sqm</b>

- 5.9 As demonstrated above, the proposals therefore do not exceed the threshold set out in Policy H2 and so the requirement for residential provision is not triggered. In any event, this policy is partly reduced in weight by the increasing weight attributed to draft London Plan Policy SD5c.
- 5.10 A more detailed breakdown of the floorspace gains and losses is set out in the accompanying Design and Access Statement.

### Small business workspace

- 5.11 Policy E1 (Economic development) of the Local Plan clearly sets out the Council's commitment to supporting businesses of all sizes, especially start-ups and SMEs. The policy's supporting text goes on to state that, while Camden has a large proportion of small businesses, the supply of suitable premises is currently under pressure from rising land values, limited land availability and 'permitted development' rights which allow the change of use from offices to residential. Draft new London Plan Policies E1 and E2 also seek to encourage the provision of a range of low-cost business space to meet the needs of start-up and SME occupiers.
- 5.12 As identified in LB Camden's Employment Land Review (2014), start-up and SME businesses represent a significant proportion of the Borough's economy, with a key issue to 2031 being identified as providing appropriate floorspace for start-ups and SMEs in terms of scale, form and location. The conclusions therefore advise the Council to encourage incubator, accelerator and co-working spaces (IAC), which are experiencing significant demand across the Borough – as provided in the current proposal.
- 5.13 Small business workspace of this nature is in line with many Central London redevelopment projects in which a range of occupiers of sizes and sectors co-exist within a collaborative and entrepreneurial ecosystem.
- 5.14 A central benefit of the Workspace operating model, as will be employed at 13 Fitzroy Street, is the opportunity presented to start-up and SME businesses to connect and network with one another. This environment of connectivity acts to encourage the flow of ideas and experience, the spread of innovation, and growth for the benefit of both individual businesses and the Borough's wider economy.
- 5.15 While it is noted that the draft New London Plan Policy E3 identifies that affordable workspaces should be provided within development proposals, limited weight is afforded to the draft policies due to the Plan's early stage of production. In any event, the proposed floorspace will be based on Workspace's operating model and their extensive experience and reputation as a highly successful provider of quality affordable and flexible workspaces across London.



## Employment and Economic Benefits

- 5.16 The NPPF, London Plan and LB Camden Local Plan all support employment provision. The London Plan (Policy 4.2) encourages office developments to improve London's competitiveness and enhance its provision for businesses of different types and sizes.
- 5.17 In line with policy aspirations, the proposed development at 13 Fitzroy Street will have an important employment and economic impact will provide much needed B1 floorspace to accommodate micro, small and medium sized enterprises operating in the Borough.
- 5.18 The proposed development at 13 Fitzroy Street will assist in providing new employment and training opportunities during both the construction and operational stages alongside supporting wider long-term benefits for the local economy including indirect employment generation, increased economic output and business rates contributions.
- 5.19 The proposed development will help to meet the demand for start-up and SME floorspace in the Borough and, in accordance with London-wide and local policy support employment growth within the CAZ and Central London area.
- 5.20 As outlined in the accompanying Economic Benefits Assessment, some of the wider economic benefits of the proposed development include:
- Generation of around 120 direct temporary construction jobs each year of construction at a range of skill levels;
  - Supporting in the region of 150 indirect jobs in services and other businesses from the wage spending of construction workers and supplier sourcing;
  - Generation of approximately £7.3 million direct Gross Value Added (GVA) and £7.5 million indirect GVA per annum during the construction stage;
  - Supporting around 850 direct jobs associated with occupier businesses and the ancillary café;
  - Supporting further jobs in the local supply chain through wage spending by occupiers and of local businesses supplying goods and services to Workspace and its occupiers; and
  - Generating in excess of £90 million direct GVA per annum once the development is operational.

## Heritage

- 5.21 Chapter 16 of the NPPF requires that, in determining planning applications, local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness of the historic environment and the desirability of putting heritage assets to viable use (para 192).
- 5.22 The NPPF encourages LPAs to look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to *"enhance or better reveal their significance"* (para 200).
- 5.23 In determining planning applications, the NPPF (para 192) states that local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.24 Paragraph 196 of the NPPF notes that, where the overall net balance of heritage considerations is that any harm is less-than-substantial, *"this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use."*

- 5.25 In line with national policy, London Plan Policy 7.4 specifies that development should identify, value, conserve, restore, reuse and incorporate heritage assets, including conservation areas. Meanwhile Camden's Local Plan Policy D2 requires developments to conserve and, where appropriate, enhance the Borough's heritage assets and their settings, including listed buildings and Conservation Areas. In addition, development proposed outside of a Conservation Area that cause harm to the character or appearance of that Conservation Area will be resisted.
- 5.26 While the site is not itself located within a Conservation Area, it is surrounded on four sides by neighbouring Conservation Areas.
- 5.27 The Grade II listed BT Tower is located directly to the west of the site across Cleveland Mews and there are also a number of Grade II listed buildings within the Fitzroy Square Conservation Area to the north, including:
- No. 1-8 Fitzroy Square (Grade II);
  - No. 33-40 Fitzroy Square (Grade II);
  - 41 Fitzroy Square (Grade II);
  - 43-45 Maple Street (Grade II); and
  - 30-39 Fitzroy Street (Grade II).
- 5.28 However, the location of the site and nature of surrounding buildings means that the site does not fall within the settings of these buildings.
- 5.29 As demonstrated in the accompanying Design and Access Statement, the proposed development will have no direct impact on the surrounding Conservation Areas or nearby listed buildings to the north. Given the scale and design of the proposed two-storey extension and the limited architectural merit of the existing Cleveland Mews frontage, the proposed development will also have no material impact on the adjacent Grade II listed BT Tower.
- 5.30 As outlined in accompanying Design and Access Statement, given that the overall height of the existing building will not be altered, there will be no material effect on the London View Management Framework (LVMF) Parliament Hill Panorama View 2a.
- 5.31 In summary, the proposed development is contextually appropriate and will preserve the setting, character and appearance of surrounding heritage assets in line with national, regional and local policy.

## **Design**

### **Appearance**

- 5.32 High quality design is promoted throughout national policy and guidance and the Local Plan.
- 5.33 The NPPF Chapter 12: 'Achieving well-designed places' emphasises the importance of good design. Notably the NPPF (paragraph 124) identifies that "*Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.*"
- 5.34 The NPPF specifies that, in determining planning applications, local planning authorities should aim to ensure that developments respond to local character and history whilst not preventing or discouraging appropriate innovation or change (paragraph 127).
- 5.35 At a local level, Local Plan Policy D1 seeks to secure high quality design and requires new development that:
- a Respects local context and character;

- b Preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c Is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d Is of sustainable and durable construction and adaptable to different activities and land uses;
- e Comprises details and materials that are of high quality and complement the local character;
- f Integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g Is inclusive and accessible for all;
- h Promotes health;
- i Is secure and designed to minimise crime and antisocial behaviour;
- j Responds to natural features and preserves gardens and other open space;
- k Incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l Incorporates outdoor amenity space;
- m Preserves strategic and local views;
- n For housing, provides a high standard of accommodation; and
- o Carefully integrates building services equipment.

5.36 In line with both national and local policy, the proposed development will seek to both preserve and enhance the existing building and surrounding context, including the Grade II listed BT Tower.

5.37 The proposed extension takes cues from both 13 Fitzroy Street and surrounding buildings, with the proposed façade continuing the strong modular design of the exterior of floors below. The extension façade is proposed to be primarily comprised of composite rainscreen cladding to complement both the existing Block B façade, the Grade II listed BT Tower and other large commercial buildings located in the site's immediate context. Altering the colour and size of the panels will provide a subtle differentiation between the new and the old. Meanwhile the black metal cladding will simultaneously connect the extension with the new reconfigured entrance located on Fitzroy Street.

5.38 The reconfigured Fitzroy Street entrance will act to create a direct visual and physical link between Fitzroy Street and the reception area, offering a more inviting arrival experience for occupiers and visitors, and will significantly improve access for those who are less able. Meanwhile the proposed projecting entrance canopy is proposed to be clad in black to complement the Block B extension and will provide the entrance with greater prominence on the streetscape.

### **Scale and Massing**

5.39 Since its original construction in the 1960s, 13 Fitzroy Street has been subject to numerous extensions and adaptations. Each subsequent intervention has impacted on the building to create the existing structure. Nevertheless, the scale of the proposed Block B extension has been

designed as such that it remains subordinate to the existing building and integrates within the surrounding context.

- 5.40 As set out in the accompanying Design and Access Statement, a series of massing studies have been undertaken to create the most appropriate approach to extending the existing building; the scale of development therefore ensures no adverse impacts on daylight and sunlight to neighbouring residential properties.
- 5.41 The scale of the Block B extension has also been designed to ensure that there is negligible impact on the amenity of residential uses at 19-23 Fitzroy Street.

## **Transport, Servicing and Parking**

- 5.42 The London Plan (Policy 6.3) requires that development proposals should ensure that impacts on transport capacity and the transport network are fully assessed with development proposals not adversely affecting safety on the transport network. The draft new London Plan (Policy T4) maintains this approach, requiring that impacts on transport network capacity are assessed at the local, network-wide and strategic level.
- 5.43 LB Camden Local Plan Policy A1 echoes the London-wide approach, stating that development proposals should adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network.
- 5.44 A Transport Statement has therefore been produced by Caneparo Associates to demonstrate that the proposals are compliant with policy.

## **Servicing**

- 5.45 LB Camden Local Plan Policy A1 requires development proposals to assess and address transport impacts, including via servicing. This is supported by London Plan Policy 6.3, which requires a full assessment of impacts on transport capacity and the transport network, at both corridor and local level.
- 5.46 The existing servicing strategy will be maintained via an off-street loading bay and goods yard accessed directly from Cleveland Mews. Designated zones for refuse, loading and pedestrians ensure clear and safe access for all users.
- 5.47 A dedicated service lift will allow for general access and servicing to all floors directly from the loading bay. Meanwhile main deliveries to the offices can be achieved via the front entrance located on Fitzroy Street.
- 5.48 While the future servicing demand of the office floorspace will be largely dependent upon the final occupier, the accompanying Transport Statement concludes that the proposals are not anticipated to result in a material impact on the local highways network.
- 5.49 Deliveries will predominantly be undertaken by LGV vehicles with an infrequent demand for larger delivery vehicles for occasional delivery needs (e.g. occupiers moving in/out and furniture delivery).

## **Car Parking**

- 5.50 Given the site's high PTAL of 6b and location within the CAZ, the proposals comprise a car-free scheme with the removal of all existing car parking. This is fully aligned with Local Plan Policy T2, which seeks to limit car parking and requires all new developments in the Borough to be car-free. This approach is also supported by London-wide policies to encourage sustainable methods of travel and minimise use of the private car.

- 5.51 As outlined in the accompanying Transport Statement, the car-free nature of the proposed development is an appropriate response to the site's high accessibility and will encourage more journeys to be taken by sustainable transport methods.

### **Cycle Parking**

- 5.52 Local Plan Policy T1 seeks to promote cycling across the Borough and ensure a safe and accessible environment for cyclists through the provision of accessible, secure cycle parking facilities that exceed the minimum London Plan (2016) standards, as outlined below:
- Long-stay associated with Business (B1 uses): 1 space per 90 sqm within inner/central London.
  - Short-stay associated with Business (B1 uses): 1 space per 500 sqm (first 5,00 sqm) and 1 space per 5,000 sqm thereafter.
  - Long-stay associated with A2-A5 uses: 1 space per 175 sqm (from a threshold of 100 sqm).
  - Short-stay associated with A2-A5 uses: 1 space per 40 sqm (from a threshold of 100 sqm).
- 5.53 The proposals include a policy-compliant uplift in cycle parking, with a total of 142 cycle parking spaces proposed. This total includes 126 two-tiered Josta Stands (or similar), while 10% of the total spaces (16 in total) will be comprised of Sheffield Stands.
- 5.54 A cycle store will also be provided at lower ground floor level offering secure, sheltered and accessible cycle parking facilities. The cycle storage area is accessed from street level via a level threshold from the loading bay. The internal cycle storage is complimented via the 11 existing Sheffield Stands (equal to 22 spaces) located to the front of the building.

### **Energy and Sustainability**

- 5.55 All new development must be assessed according to its resilience to the impacts of climate change and contribution to supporting the delivery of renewable and low carbon energy and associated infrastructure. Such matters are central to the economic, social and environmental dimensions of sustainable development (NPPF, paragraph 93).
- 5.56 At a local level, Local Plan Policy CC1 requires all development to minimise the effects of climate change and encourages all proposals to meet the highest environmental standards during construction and operation. Meanwhile, London Plan Policy 5.2 sets a target for non-domestic buildings to achieve a 35% reduction in CO<sub>2</sub> against 2010 Building Regulations.
- 5.57 The proposals constitute the re-use and extension of an existing building in a highly sustainable location, seeking to retain as much of the existing structure as possible.
- 5.58 The accompanying Design and Access Statement outlines how sustainable design and construction principles have been incorporated into the proposals, including:
- Reducing waste: development and implementation of a Resource Management Plan to include waste arising from the proposed development. The overall approach has been to retain as much of the existing structure as feasible.
  - Reducing energy and water consumption: monitoring, recording and reporting of energy and water consumption throughout the refurbishment programme to encourage reductions. The Principal Contractor for the project will also be required to operate an Environmental Management System covering their main operations and appoint a Sustainability Champion to monitor compliance with the relevant sustainability performance criteria.

- Minimising and recycling materials: aiming to reuse 75% of ‘difficult to manage wastes’ on or off-site while incorporating suitable durability and protection measures to prevent damage to vulnerable elements of the building and landscaping.
- Low embodied energy materials: completion of a life cycle impact assessment to measure the life cycle environmental impact of the materials used for the refurbishment works.
- Plant replacement strategy: a variety of measures are proposed to ensure improved energy performance of both existing and new building services.
- Energy and water demands: inclusion of more efficient fittings and installation of water metres to allow water consumption to be monitored and managed. The proposals also seek to improve the overall energy performance of the existing building via a number of measures including through more efficient core heating, hot water, cooling and ventilation systems.
- Water efficiency credits: targeting 75% of available credits under the BREEAM Water category.
- Architecture: reuse and upgrading of the existing solar shading and passive ventilation systems, alongside relocation of the existing brown roof located on the roof of Block B to the roof of the proposed extension.

5.59 Adaptability has also been incorporated within the design approach to ensure that the building can respond to the changing requirements of future occupiers, including ensuring that further expansion can be accommodated.

5.60 Full details of the above principles can be found in the Design and Access Statement.

## **Amenity**

5.61 The London Plan Policies 7.6 and 7.7 state that buildings and structures should not cause unacceptable harm to the amenity of surrounding land uses and buildings, including in relation to overshadowing and reflected glare.

5.62 Reflecting the London-wide policy approach, Local Plan Policy A1 specifies that the Council will seek to protect the quality of life of occupiers and neighbours, only granting permission where development does not cause unacceptable harm to amenity.

5.63 These requirements are taken into account in the proposals.

## **Privacy and Overlooking**

5.64 Notwithstanding the fact that the proposed terrace does not directly overlook residential uses, trees and hedges will be planted around the perimeter to further reduce overlooking. Meanwhile, the design is such that users are focused towards the centre of the area to reduce activity in closer proximity to neighbouring residential uses.

5.65 Given the careful design of the terrace, the proposals will have minimal impact on the residential amenities of these neighbouring uses. This is in line with Policy A1, which seeks to protect the amenity of surrounding land and buildings, with particular focus on residential uses.

## **Daylight and Sunlight**

5.66 In accordance with the requirements of Camden Planning Guidance Amenity, this application is accompanied by a Daylight and Sunlight Assessment (produced by Waldrums). The report considers the impact of the development on the daylight and sunlight to surrounding residential properties.

- 5.67 Using the methodologies contained in the BRE Guidelines, as used by LB Camden to determine the acceptability of proposals, the report concludes that all surrounding properties will meet the BRE Guidelines for daylight and sunlight following construction of the proposed Block B extension.

## **Other Environmental Considerations**

### **Noise and Vibration**

- 5.68 Policy A4 states that the Council will seek to ensure that noise and vibration is controlled and managed, with development required to have regard to LB Camden's Noise and Vibration Thresholds. This is supported by Policy 7.15 of the London Plan, which requires development proposals to contribute to the reduction of noise, and maintained by emerging draft new London Plan Policy D13 which seeks to reduce, manage and mitigate noise.
- 5.69 Arup has produced a Noise Impact Assessment to assess the potential noise impacts that could arise from the proposed development during both construction and operation.
- 5.70 In respect of plant noise, the Noise Impact Assessment concludes that, given the development constitutes replacement of existing plant services with equipment with the same emissions as existing, there will be no net increase in noise emissions to neighbouring uses. The plant will continue to operate normally during working hours (between 07:00 and 18:00 hours) with the same availability for overnight and weekends as existing.
- 5.71 The operation of building services equipment is not anticipated to have an offsite vibration impact as it will be isolated by standard control measures.
- 5.72 The proposed roof terrace will comprise a high quality and accessible external space. It will be available to business occupiers during normal working hours and for occasional business events during evenings.
- 5.73 Whilst the terrace is located away from residential uses to the north, a number of mitigation measures have also been incorporated to ensure any associated noise impacts are minimised. These include:
- Setback of terrace from gantry edge;
  - A balustrade comprised of solid material such as glass to an adequate height to acoustically screen sound to neighbouring dwellings;
  - Speakers located at a low level below screening height;
  - Tree and hedge planting around the terrace perimeter; and
  - Focusing users towards the centre of the terrace.
- 5.74 Further details can be found in the accompanying Design and Access Statement and Noise Impact Assessment.
- 5.75 With regard to temporary construction noise and vibration impacts, no adverse impacts upon surrounding sensitive receptors are anticipated. The applicant is recommended to require its contractor to abide by BS5228 Code of practice for noise and vibration control on construction and open site – Part 1: Noise and Part 2: Vibration.

### **Waste and Recycling**

- 5.76 LB Camden Local Plan Policy CC5 outlines the Council's commitment to making Camden a low waste borough, with new developments required to include facilities for the storage and collection of waste and recycling.

- 5.77 The Camden Planning Guidance 1 (Design) provides further details regarding waste and recycling storage, with a requirement of approximately one cubic metre of storage space for every 300-500 sqm of commercial floorspace (including both recyclable and non-recyclable waste).
- 5.78 A designated refuse storage area is proposed, allocating a 41 sqm area that can accommodate 11x1100 sqm litre eurobins while leaving sufficient space to access and manoeuvre bins during collection. The refuse store will be designed to meet all criteria outlined in Camden Planning Guidance 1 (Design).
- 5.79 Meanwhile a two-metre wide refuse corridor is proposed within the loading bay to ensure unobstructed access between the pickup location and refuse storage area.
- 5.80 Refuse collection will be managed by Workspace's retained waste management provider (Bywater), with whom the applicant has been in pre-application discussions. In order to mitigate the shortfall in overall waste storage space sought for a building of this size, Workspace are seeking to arrange a bi-weekly refuse collection between the hours of 07:30 and 17:30.

### **Water and Flood Risk**

- 5.81 The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. London Plan Policy 5.12 requires proposals to comply with the flood risk assessment and management requirements as set out in the NPPF. Meanwhile Local Plan Policy CC3 seeks to ensure that flood risk is not increased by new development, with the impact of proposals in areas at risk of flooding being carefully considered. Policy CC3 also requires development to incorporate water efficiency measures, with all non-residential development expected to meet BREEM water efficiency credits.
- 5.82 The site is located entirely within Flood Zone 1, which denotes land with a low probability of flooding. It is therefore considered a preferred location for new development.
- 5.83 As the proposals will not alter existing building footprint or the existing basement excavations, a Flood Risk Assessment has not been produced. However, given the site's location in Flood Zone 1 the proposed development is therefore unlikely to impact the flood risk to the site or surrounding area.
- 5.84 In line with Local Plan Policy CC3, the proposed development will comply with BREEM water efficiency credits. As outlined in the accompanying Design and Access Statement, water demand will be reduced through the specification of more efficient fittings and installation of water meters to ensure water consumption can be monitored and managed so as to encourage reductions.



## 6.0 Conclusions

- 6.1 This Planning Statement sets out the rationale for the proposed development at 13 Fitzroy Street and has considered the key principles of the development against the policies set out within national policy and the statutory development plan and in relation to material considerations.
- 6.2 The proposed extension, reconfigurations and external works are of a high-quality and modern design that responds to the existing building and surrounding context.
- 6.3 The proposed development will add to Workspace's fast-growing network of creative co-working space that enables small businesses to work alongside one another within a collaborative and entrepreneurial environment. Once operational, the new Workspace building at 13 Fitzroy Street will be furnished with break-out spaces, dedicated meeting rooms, cycle parking and associated facilities, and an ancillary café space. It is envisaged that the adjusted building will accommodate approximately 860 workstations and will support in the region of 850 direct FTE jobs.
- 6.4 As noted below, the proposed development will deliver a range of economic, social and environmental benefits, including:
- Supporting London-wide and local policy objectives to promote and enable the continued development of a strong, sustainable and diverse economy across Central London;
  - Creation of much-needed B1 floorspace to support the needs of start-up and SME businesses in LB Camden;
  - Creation of an ancillary café space to further encourage interaction and collaboration between occupier businesses;
  - Efficient re-use of an existing building at an accessible and sustainable Central London location;
  - Reconfiguration and re-location of the main entrance to improve accessibility and strengthen the building's existing relationship with Fitzroy Street;
  - Inclusion of high quality architecture and design that respects both the existing building and surrounding context, including the adjacent Grade II listed BT Tower; and
  - A car-free development at a location with high public transport accessibility that encourages sustainable travel options.
- 6.5 The scheme fully accords with national, regional and local planning policy and offers a number of benefits which militate strongly in favour of the grant of planning permission. We trust the Council agrees with this analysis of the planning merits of the proposals and will support this application.





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