



Our Ref: LWT/IB?AA113775

Planning Solutions Team  
London Borough of Camden  
Planning and Built Environment  
5 Pancras Square  
London  
N1 4AG

For the attention of John Diver

6 June 2019

Dear Mr Diver

**APPLICATION REF: 2019/2095/P: No. 160 - 161 Drury Lane & 4 - 6 Parker Street,  
London, WC2B 5PN : OBJECTION**

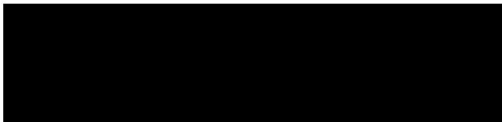
I write further to my letter of 22 May 2019 on behalf of LW Theatres, owner of the Gillian Lynne Theatre, Drury Lane.

As noted in that letter, and as you will be aware from a review of the submitted application documentation, the proposal takes no account of its location adjacent to the Gillian Lynne Theatre. It is noteworthy – and clearly disappointing – that no documentation (including the Planning Statement and the Transport Statement) makes any reference to relevant adopted Local Plan policies in this regard. Furthermore, the draft Construction Management Plan makes no attempt to respond to the Council's guidance in respect of its completion. It is therefore unsurprising that there is no assessment by the applicant of the potential impacts of the development on the Gillian Lynne Theatre. It is axiomatic that the proposal cannot be considered to demonstrably accord with those relevant policies, and cannot, therefore, be considered acceptable based on the information currently available.

It is also noted that in the Council's letter to the agent of 4 January 2019 addressing the pre-planning application enquiry, whilst Local Plan policy A1 is identified as a relevant policy, the letter contains no assessment of the proposal's potential impact. Similarly, and critically, that letter fails to identify Local Plan Policy C3 as relevant to the proposal. Any determination of the application without addressing these two policies would clearly be vulnerable to legal challenge.

Local Plan Policy C3 aims to ensure that the Council gives "*particular attention to the value provided by cultural and leisure facilities in planning decisions*" (our emphasis). In balancing the weight to be given to different planning policies in its decision-making, the Council's specific inclusion of the word "particular" is telling in this regard. The policy states that the Council will seek to protect cultural facilities "*and manage the impact of adjoining uses where this is likely to impact their continued operation*".

It is therefore clear that the potential impact of the proposals on the continued operation of the Gillian Lynne Theatre is a key planning consideration in the assessment of the acceptability or otherwise of this proposal. In the absence of credible information demonstrating that the impact is acceptable (and,





currently, in the complete absence of any information at all), this key planning policy test cannot be met and the proposal cannot be considered acceptable.

The National Planning Policy Framework makes it an explicit requirement that new development can be integrated effectively with existing facilities such as theatres, that such existing facilities should not have unreasonable restrictions placed upon them as a result of new development. It is the responsibility of the applicant to ensure that suitable mitigation addressing relevant concerns can be accommodated by the new development and are put in place before the development has been completed.

Local Plan Policy A1 seeks to ensure that the amenity of communities, occupiers and neighbours is protected and explicitly states that development "that fails to adequately assess and address transport impacts" will be resisted. Factors considered will include Transport Assessments, Delivery and Servicing Management Plans and Construction Management Plans. Once again, this policy test cannot be met and the proposal cannot be considered acceptable.

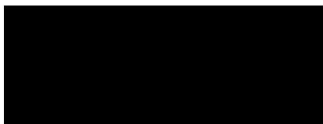
It appears from consideration of the (scant) application documentation submitted that the development as currently proposed could potentially have a significant detrimental impact on the operation of the theatre, with particular regard to access and servicing arrangements of the theatre and theatre activities during the day. There are also considerable concerns relating to construction activities. Both threaten the theatre's viability. LW Theatres therefore objects to the proposal and considers that it demonstrably cannot be considered acceptable on the basis that it has been submitted. Unless and until further detailed information is provided, and that this information can satisfy these key planning policies and the specific concerns of LW Theatres in respect of the Gillian Lynne Theatre, planning permission cannot be granted.

The applicant has at no stage approached LW Theatres to discuss the specific operational needs of the theatre. Nevertheless, LW Theatres remains willing to meet the applicant to help their understanding of these key requirements. If further information is then provided by the applicant such that a proper evaluation of potential impacts can be undertaken, LW Theatres is, of course, happy to review its response to the proposal.

LW Theatres would, in all events, expect to be included as a mandatory consultee – and its agreement to detailed access/servicing arrangement during constructions works required – in the legal binding Construction Management Plan.

Should you have any queries in respect of this objection please do not hesitate to contact me.

Yours sincerely



Ian Blacker  
**Planning Director**  
WYG Group