

MET BUILDING, 22 PERCY STREET

Planning Statement

July 2021

CONTENTS

- 1.0 Introduction 2
- 2.0 Site Context 3
- 3.0 Proposed Development..... 5
- 4.0 Planning Policy Context..... 6
- 5.0 Planning Policy Assessment 8
- 6.0 Summary 13

1.0 Introduction

- 1.1 This Planning Statement has been produced on behalf of Lazari Properties 1 Limited, ('the Applicant') in respect to support of an application for full planning permission ('the Application') for their development proposals at the Met Building , 22 Percy Street ('the Site') within the London Borough of Camden (LBC).

Alterations to the building including new terraces to first, second and fourth floor level, new enclosed staircase with terraced deck above the service yard, ancillary facilities at fourth floor podium level, amenity space on the tower roof with retractable roof, refurbished entrances along Percy Street, new plant, cycle parking, and other associated works

- 1.2 The submission of this Application follows pre-application discussions with the London Borough of Camden (LBC). This Planning Statement should be read and considered in conjunction with the plans and drawings submitted as part of this Application, together with the following supporting documents:

- Planning Application Form, prepared by CBRE;
- CIL Form, prepared by CBRE;
- Planning Statement, prepared by CBRE;
- Design and Access Statement, prepared by Forme UK;
- Existing and Proposed Drawings, prepared by Forme UK;
- Landscaping Statement and Plans, prepared by The Landscape Partnership;
- Heritage Statement, prepared by Prentice Moore Heritage;
- Transport Statement, prepared by Steer;
- Noise Impact Assessment, by Noise Solutions Limited;
- Daylight, Sunlight and Overshadowing Note, prepared by Point 2 Surveyors;

- 1.3 The next section of this statement, Section 2 provides a description of the site. Section 3 describes the proposals. Section 4 provides the planning policy context; Section 5 comprises an assessment of the proposals against relevant planning policies and other material considerations before concluding in Section 6.

2.0 Site Context

SITE AND SURROUNDING AREA

- 2.1 The Site is bound by Tottenham Court Road to the east, Percy Street to the south and Windmill Street to the north. The Site comprises a part 4 and part 13 storey office building with retail on part of the ground floor on the eastern elevation fronting Tottenham Court Road (all uses within Class E). This application relates to improvements to the office part of the development only and does not impact on the demise of the retail units on ground/basement floor.
- 2.2 The building has a four storey podium (ground plus three levels) with a further 9 storeys of office within the tower above the podium level in the centre of the Site set-back from Tottenham Court Road and the properties to the west.
- 2.3 There are two separate office entrances (one for the podium and one for the tower) located along Percy Street on the southern elevation of the Site. The service yard to the building is located on the north west portion of the Site and is accessed from Windmill Street.
- 2.4 The building was initially built in the 1960s and the tower element is the tallest building in the vicinity of the Site. The modern architecture is in a very different style to the majority of other buildings within the surrounding Conservation Areas. The building underwent extensive refurbishment in 2005 and the Applicant purchased the property in 2007. Some of the office leases on the building have expired and this represents an opportunity to undertake a refurbishment of the office building to improve the quality of the office space to today's standards and provide an improved working environment to the existing and future tenants in a sensitive manner to adjoining properties.
- 2.5 To the west of the service yard along Windmill Street is a commercial building in office use with retail on the ground floor (11-14 Windmill Street). The west of the building along Percy Street comprises 3 x Grade II listed terraces buildings (28-30 Percy Street). No. 28 Percy Street adjoins the Site and is in use as residential flats with a front and rear terrace at top floor level.
- 2.6 There are a number of other listed buildings in the vicinity of the Site including a number of properties opposite the Site on the south side of Percy Street, the Rising Sun Public House to the north of the Site and several other properties further west of 28-30 Percy Street along Percy Street (north and south side of Percy Street).
- 2.7 The Site is not located in a Conservation Area but is surrounded on all sides by two separate Conservation Areas (CA) - Charlotte Street CA to the north, west and south, and Bloomsbury CA to the east on the opposite side of Tottenham Court Road.
- 2.8 Further details on the heritage assets in the vicinity of the Site are detailed within the Design & Access Statement and Heritage Assessment supporting this application.
- 2.9 The site benefits from excellent transport links and has a Public Transport Accessibility Level (PTAL) rating of 6b, which represents the highest rating. The Site is within less than 5 minutes' walk from Tottenham Court Road and Goodge Street underground stations to the south and north of the Site respectively. There are numerous other underground stations within walking distance of the Site as well as many bus stops.

PLANNING HISTORY

- 2.10 A review of LBC planning records has been undertaken in order to establish the planning history for this site. The Site was initially constructed in the early 1960s.

2.0 Site Context

- 2.11 The building underwent an extensive refurbishment in 2005 following a scheme designed by ORMS to provide a modernised office environment and provide improved facilities. The exterior of the building was also re-clad as part of this refurbishment
- 2.12 In 2005, two planning permissions were granted for the change of use of part of the ground floor and basement to office (along Percy Street), ground floor alterations, and the inclusion of plant at podium level on the Percy Street side close to No. 28 Percy Street (Ref: 2005/2823/P and 2005/4558/P).
- 2.13 There have been several other minor works applications on the Site and in particular associated with the retail units at ground floor.

3.0 Proposed Development

- 3.1 The applicants and appointed design team have developed, with the engagement of Officers at LBC, a high-quality proposal to refurbish and enhance the office offer and amenities for the office tenants. The retail units on ground and basement floor level are not impacted by the proposals. The description of development is provided below:

Alterations to the building including new terraces to first, second and fourth floor level, new enclosed staircase with terraced deck above the service yard, ancillary facilities at fourth floor podium level, amenity space on the tower roof with retractable roof, refurbished entrances along Percy Street, new plant, cycle parking, and other associated works

- 3.2 The proposed works can be categorised as follows:
- New terrace space at 1st, 2nd and 4th floor level (east and west) with indicative landscaping proposals outlined in the enclosed landscaping statement;
 - The 4th floor podium (west) terrace includes enclosed space for w/c, lift, lift lobby, and fire escape stair and is set back and screened from the adjoining residential properties;
 - New feature enclosed circulation stair with a terraced deck above the service yard provides access to the podium terrace space on the western part of the Site;
 - New amenity space on the tower roof to serve the tower office tenants with a retractable glass roof;
 - Refurbished and enhanced office entrances on Percy Street. This includes a double height entrance for the tower office floors;
 - Providing new enhanced cycle parking within the basement and service yard; and
 - New plant on 4th floor podium level (east and west).
- 3.3 The proposal largely consists of external alterations to improve the amenity facilities for the office tenants of the building. The uplift in GIA as a result of the proposal is 214 sq m of Class E office space. The retail units of the building are not impacted as a result of the application for the improvements to the office building.

	Existing GIA (sq m)	Proposed GIA (sq m)
Office (Class E)	11,681	11,895
Non-Food Retail (Class E)	1,882	1,882
Total	13,563	13,777

4.0 Planning Policy Context

- 4.1 This section of the report provides a summary of the relevant planning policy framework against which the application will be assessed. It covers national, regional and local level policies of relevance to the site.

National Policy

- 4.2 National planning policy is set out in the form of the revised National Planning Policy Framework (NPPF), which was adopted on 19 February 2019. At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of the policies within the Framework.
- 4.3 For decision taking, the presumption in favour of sustainable development means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.

Development Plan

- 4.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The Statutory Development Plan for LBC comprises:
- The London Plan (March 2021);
 - Camden Local Plan (2017);
 - Camden Site Allocations (September 2013);
 - Euston Area Plan (January 2015); and
 - Fitzrovia Area Action Plan (March 2014).

Supplementary Planning Documents

- 4.5 LBC has also prepared a series of Camden Planning Guidance (CPG) documents, which are treated as material considerations in planning decisions. Such documents carry less weight than the Local Plan or other development plan documents. Relevant CPG documents include:
- Amenity (2021);
 - Developer Contribution (2019);
 - Employment Sites and Business Premises (2021);
 - Housing (2021); and
 - Transport (2021).

Designations

- 4.6 The Site has the following designations within the Development Plan:
- Located within Central Activities Zone (CAZ);
 - Located within Central London Area (CLA);

4.0 Planning Policy Context

- The three frontages of the building are designated primary shopping frontages within the Central London frontage;
- Located within the Fitzrovia Area Action Plan boundary.

5.0 Planning Policy Assessment

- 5.1 This section of the Planning Statement provides a description and assessment of the following key elements of the proposal.

- Land Use;
- Design and Heritage;
- Amenity; and
- Transport.

LAND USE

Principle of Development

- 5.2 Policy SD4 of the London Plan states that the nationally and internationally significant office functions of the CAZ should be supported and enhanced. Policy SD5 states that office development and other CAZ strategic functions should be given greater weight relative to new residential development in all parts of the CAZ except specific areas such as the Vauxhall, Nine Elms and Battersea and Elephant & Castle Opportunity Areas, as well as wholly residential streets or predominately residential neighbourhoods.
- 5.3 Policy E1 of the Camden Local Plan seeks to direct office development to growth areas, Central London, and the town centres in order to meet the forecast demand for 695,000sqm of new office floorspace between 2014 and 2031. The same policy supports proposals for the intensification of employment sites and premises where these provide additional employment and other benefits.
- 5.4 It is considered that the proposal to improve the quality of office floorspace on the Site meets the objectives of both London Plan and Camden Local Plan policies. The proposal seeks to refresh and improve the identity and standard of the building to meet the needs of office tenants providing outdoor landscaped areas to improve the workplace experience through wellbeing.

Mixed-Use Development

- 5.5 Policy H2 of the Camden Local Plan states that within the CLA where development involves additional floorspace of more than 200 sq m GIA, the Council require 50% of additional floorspace to be self-contained housing subject to the following considerations:
- the character of the development, the site and the area;
 - site size, and any constraints on developing the site for a mix of uses;
 - the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
 - whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
 - whether the development is publicly funded or serves a public purpose
- 5.6 Policy H2 of the Local Plan, Principle 1 of the Fitzrovia Area Action Plan (2014) and the CPG Housing (2021) document outlines that housing should typically be provided on-site.
- 5.7 The supporting text to Policy H2 (Paragraph 3.53) outlines that where a development adds 1,000sqm (GIA) or more floorspace, the Council considers that it will generally be possible to achieve a significant number of homes on-site sufficient to support the stairs, lifts and circulation space needed to serve them, and will therefore particularly expect on-site

5.0 Planning Policy Assessment

provision. Therefore, there is a recognition within policy of the challenges of providing residential on-site for minor uplifts above the 200 sq m GIA.

- 5.8 Where the Council accept that it is not practical to provide residential on-site, the Council will seek the provision of housing on an alternative site nearby, or exceptionally a payment in lieu.
- 5.9 The Application proposes an uplift of 214 sq m GIA. Therefore, under Policy H2 there would be a requirement to provide 107 sq m residential floorspace on Site (i.e. 50% of the uplift in floorspace). This is clearly a very minor uplift in floorspace that under the Camden guidance would likely deliver one residential unit within this large commercial building.
- 5.10 We do not consider one residential unit would be compatible within this building under Policy H2. It would not be possible to provide a residential unit above ground floor as residential above first floor would require a separate core and lifts through the office building. Including a core and lift for residential above ground floor would quickly exceed the residential requirement of 107 sq m.
- 5.11 Therefore, any opportunity for residential would be limited to the ground floor level within the building. The three frontages of the Site are defined as primary shopping frontages within the Camden Local Plan. The Tottenham Court Road primary shopping frontage currently has retail uses on ground floor. The Percy Street and Windmill Street primary shopping frontages comprise retail uses on the corner of Tottenham Court Road and office space at ground floor, which is also considered a town centre use.
- 5.12 Policy TC2 of the Local Plan seeks to protect retail and town centre uses within protected frontages and will only permit conversion to residential use where it doesn't harm the role and character of the centre, including maintaining the supply of shop premises in centres across the Borough.
- 5.13 Therefore, residential in place of the retail use is clearly not supported in Camden policy. Residential on ground floor on Windmill Street or Percy Street would also result in the loss of a town centre use in the primary frontage.
- 5.14 A residential unit on the ground floor of Windmill Street will provide a very poor quality living environment as any such unit would be a single aspect north facing unit. Such a ground floor unit would also be adjoining a service yard which would lead to amenity concerns with vehicle movement etc.
- 5.15 The Percy Street ground floor largely comprises the office lobby for the podium and tower and losing such space to incorporate a residential unit would compromise the quality of the office function. Any such residential unit would also be single aspect and would adjoin office lobby/entrances which would again result in amenity concerns for the residential occupiers. There would also be limited opportunities for delivering adequate private amenity space for a residential unit at ground floor level and we do not consider a residential unit delivering such a small amount of floorspace would be compatible with the commercial building.

DESIGN AND HERITAGE

- 5.16 Policy D1 of the Camden Local Plan provides detailed guidance on design and outlines that the Council will seek to secure high quality design in development. The Council's policy lists a number of requirements the Council will require from development including the following which are relevant to the Application:
 - respects local context and character;

5.0 Planning Policy Assessment

- preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
 - is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
 - is of sustainable and durable construction and adaptable to different activities and land uses;
 - comprises details and materials that are of high quality and complement the local character;
 - 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;
 - is inclusive and accessible for all;
 - is secure and designed to minimise crime and antisocial behaviour;
 - incorporates high quality landscape design and maximises opportunities for greening for example through planting of trees and other soft landscaping; and
 - incorporates outdoor amenity space
- 5.17 Policy D1 outlines that the Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 5.18 Policy D2 Heritage states the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.
- 5.19 Part G of this policy resists development outside of a conservation area that causes harm to the character or appearance of that conservation area. Similarly, Part K of this policy seeks to resist development that would cause harm to significance of a listed building through an effect on its setting.
- 5.20 The proposals have been sensitively designed with the key aim of improving the amenities to the building for existing and future commercial office tenants. The application is supported by a Heritage Statement prepared by Prentice Moore Heritage which outlines that the proposals would not harm the setting of the adjoining listed building and conservation areas.
- 5.21 The new terraces would provide much needed amenity for the office tenants. The application is supported by a Landscape Design Statement prepared by The Landscape Partnership. This document provides illustrative proposals for the landscaping at each level and it is expected that further details will be secured via a planning condition. However, the document summarises the proposed approach to landscaping across the Site and set out the general character and quality of the landscaping envisaged, and such proposals meet the aspirations of Policy D1.
- 5.22 No issues were raised during pre-application discussions with works to the tower roof, podium level, stairwell or additional terraces and the proposed works will greatly improve the current environment at podium level, roof level and within the service yard.
- 5.23 The only design issue raised during pre-application discussions was related to the double height entrance to the tower building along Percy Street with the Council stating the proposal

5.0 Planning Policy Assessment

should retain its single height entrance point to reflect the prevailing shop front and entrance height along Percy Street.

- 5.24 Whilst we appreciate the scale of shop front and entrances along Percy Street is typically single storey, this reflects the prevailing building height of approximately four storeys along the street. The tower part of the proposal is 13 storey in height, which is a much larger scale than all other properties along Percy Street. We consider this represents an opportunity to include an entrance which is larger in scale than the prevailing entrance height that effectively signposts the tower office entrance. It should also be noted that the 1960s original building did include a double height entrance for the tower and this proposal reinstates the initial double height entrance.
- 5.25 The proposals are designed in a sensitive manner and would deliver high quality design appropriate for the prevailing context. There would be no harm to the setting of the adjoining heritage assets and the proposals would result in high quality landscaping across the new terrace space. Therefore, the scheme is compliant with Policies D1 and D2 of the Local Plan.

AMENITY

Daylight, Sunlight and Overshadowing

- 5.26 Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours and states planning permission for development will be granted unless this causes unacceptable harm to amenity.
- 5.27 This includes factors such as daylight, sunlight and overshadowing as well as visual privacy and outlook.
- 5.28 The Application is supported by a Daylight, Sunlight and Overshadowing note prepared by Point 2 Surveyors. From a daylight and sunlight perspective, the note outlines that 28 Percy Street is the closest residential property to the Site, but this property only has an oblique view of the development with no windows on the flank wall that overlooks the development. Point 2 Surveyors have confirmed that the modest scale of proposals would ensure that daylight and sunlight impacts upon the property will not be noticeable.
- 5.29 In terms of overshadowing, the adjoining terraces to No. 28 Percy Street will both exceed the BRE guidance on 21st March and experience no reduction to their existing sunlight availability following the implementation of the proposal.
- 5.30 Point 2 Surveyors have outlined that there are no further properties surrounding the Site that could experience any noticeable reductions in daylight, sunlight or overshadowing as a result of the proposal and therefore, the daylight, sunlight and overshadowing impacts are in accordance with both planning policy and BRE guidelines and should be considered acceptable.
- 5.31 In terms of outlook and visual privacy, there is currently plant located in very close proximity to No. 28 Percy Street. The application proposes to provide well designed terrace space to replace this freestanding plant at podium level in proximity to No. 28 Percy Street. However, the terrace has been designed sensitively to not impact on the adjoining occupiers and will be screened with landscaping and set-back by more than 3 metres from the adjoining site boundary. This will ensure there is a positive impact from the proposals on the adjoining residents from an outlook and privacy perspective.

5.0 Planning Policy Assessment

- 5.32 The adjoining properties to the service yard on Windmill Street are commercial in nature and are therefore less sensitive to daylight and sunlight etc.

Noise

- 5.33 Policy A1 of the Local Plan outlines that noise and vibration is one of the issues that need to be assessed when assessing the impact on amenity.
- 5.34 Noise Solutions Limited have provided a noise assessment to support this application. This document outlines that an environmental sound survey has been undertaken to establish the prevailing background noise levels. The assessment has demonstrated that the refurbishment of the building and the proposed new plant installation will not lead to increased plant noise levels at the nearest noise-sensitive receptors.

TRANSPORT AND SERVICING

- 5.35 Chapter 10 of the Local Plan focuses on transport and promotion of sustainable travel. Key policies related to transport include:
- Policy T1 - the Council will promote sustainable transport by prioritising walking, cycling and public transport in the Borough.
 - Policy T2 – the Council will limit the availability of car parking and require all new developments in the Borough to be car-free.
 - Policy T4 – the Council will promote the sustainable movement of goods and materials and seek to minimise the movement of goods and materials by road.
- 5.36 Minimum cycle parking standards are provided within the London Plan.
- 5.37 The location of the Site is excellent in terms of its access to public transport and walking/cycling networks, reflected in its PTAL rating of 6b.
- 5.38 The application is supported by a Transport Statement prepared by Steers. The application seeks to provide enhanced cycle facilities and proposes 215 cycle spaces, which is a vast improvement over the 27 spaces currently on Site, even with the minimal floorspace change. Based on London Plan standards, the uplift in floorspace would only be required to provide a minimum of 5 long term cycle spaces, but the Client is committed to delivering enhanced cycle facilities.
- 5.39 195 of the cycle spaces will be provided at basement level with 20 accessible spaces provided within the service yard. Cycle parking will be further encouraged by the provision of additional facilities such as showers and lockers at basement level.
- 5.40 The Transport Statement includes trip generation analysis, which outlines that there will be minimal additional activity as a result of the proposals and therefore no discernible impacts upon the operation of the surrounding highway and public transport networks.
- 5.41 The delivery and servicing will remain the same as the existing arrangement. In summary, the proposals will have no impact on the highways network and promote sustainable transport through significantly increasing cycle parking provision.

6.0 Summary

- 6.1 The proposals have been developed in consultation with Officer's at the Council through the pre-application advice received. The proposals have been subject to co-ordination and input from a full design team to ensure the schemes quality and deliverability.
- 6.2 The proposals are brought forward to improve the quality of office floorspace within the building and provide additional terrace and amenity space to meet the requirements of modern office occupiers.
- 6.3 The proposals have been sensitively designed to ensure there is no harm to the adjoining heritage assets. The terraces have been designed and located to ensure the amenity of residents is safeguarded in terms of noise, daylight/sunlight etc.
- 6.4 The proposed development also includes a significant increase and improvement in cycle parking facilities to enhance the amenity of employees and encourage sustainable travel.
- 6.5 The proposals are compliant and meet the objectives of adopted development plan policies and should therefore be granted planning permission.