

North Crescent

# PLANNING STATEMENT

July 2021

DP9 Ltd.

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## 1. INTRODUCTION

### *Purpose and structure of the report*

- 1.1 This planning statement has been prepared by DP9 Ltd on behalf of Schroders UK Real Estate Fund ('the Applicant'), in support of a Full Planning Application and associated Listed Building Consent for the development of Nos 1-4 and No.5 Chenies Street, WC1E 7EY ("the site") within the London Borough of Camden (LBC).
- 1.2 The application site consists of No. 1-4 North Crescent known as Minerva House and No. 5 North Crescent known as the Telephone Exchange.
- 1.3 The applications seek permission for the:  
  
*"Refurbishment and reconfiguration of the existing buildings; including a one storey extension, plus plant, minor demolition works associated with internal and external alterations to provide additional office accommodation and associated works"*
- 1.4 This document will provide an overview of the site and the proposed development and considers the relevant planning policies and sets out the justification for their development.
- 1.5 This Statement comprises seven sections following this introduction which are set out as follows:
  - **Section 2:** provides a description of the site and its surrounding context.
  - **Section 3:** provides information on the pre-application process
  - **Section 4:** sets out a summary of the proposed development
  - **Section 5:** sets out the Planning Policy Framework.
  - **Section 6:** assess the proposed development against relevant national and local policy.
  - **Section 7:** sets out the planning benefits associated within the scheme.

- **Section 8:** sets out the draft heads of terms associated with the development; and
- **Section 9:** sets out conclusions.

1.6 This planning statement should be read in conjunction with the following documents submitted:

- Completed Application Forms.
- CIL Forms
- Existing and Proposed Drawing Packs (prepared by Morris+Company.).
- Demolitions Plans (prepared by Morris+Company.).
- Design and Access Statement (prepared by Morris+Company).
- Townscape, Heritage and Visual Impact Assessment' (prepared by KM Heritage & AVR London).
- Schedule of Listed Building Works (prepared by Morris & Co. & KM Heritage).
- Structural Planning Report (prepared by Heyne Tillet Steel) including.
  - Ground Movement and Basement Impact Assessment
- Acoustic Report (prepared by Temple Group).
- Air Quality Assessment (prepared by AQ Consultants).
- Archaeological Assessment (prepared by MOLA).
- Construction Management Plan (prepared by Real Pm).
- Contaminated Land Assessment (prepared by Geotech).
- Daylight & Sunlight Assessment (prepared by Avison Young).
- Delivery and Servicing Management Plan (prepared by Momentum Transport).
- Energy Statement (prepared by Thornton Reynolds).
- Sustainability Statement including BREEAM (prepared by Eight Associates).
- CC1 Policy Response (prepared by Eight Associates).
- Whole of Life Carbon Assessment (prepared by Eight Associates).
- Flood Risk Assessment and SUDS Strategy (prepared by HTS London)
- Transport Assessment & Travel Plan (prepared by Momentum Transport).

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- Security Needs Assessment (prepared by QCIC).
  - Fire Statement (prepared by OFR).
  - Housing Report/viability (prepared by DS2).
  - Employment and Training Strategy & Regeneration Strategy (prepared by Volterra).
  - SuDS Strategy (prepared by HTS); and
  - Statement of Community Involvement (prepared by Kanda).

## 2. SITE CONTEXT

- 2.1 The application site is situated in the south western portion of the Borough of Camden. It is located in North Crescent on the northern side of Chenies Street between its junction with Tottenham Court Road to the west and Huntley Street to the east.
- 2.2 The two buildings located on the site are Minerva House and Telephone Exchange. When viewed from Chenies Street, Telephone Exchange is centrally located within North Crescent and Minerva House sits to the left. Both properties are office buildings and have an overall combined GIA of 5,515sqm.
- 2.3 The surrounding area is characterised by a mixture of uses. To the west of the site lie ground floor retail units on Tottenham Court Road with office space on the floors above. Further office space lies to the north along Alfred Mews with residential uses to the east along Huntley Street. The Eisenhower Centre, a deep level shelter constructed in 1942, lies to the south of the site. This structure is referenced within the Bloomsbury Conservation Area Appraisal and Management Strategy as a building of social and historic interest.
- 2.4 The site lies within the Bloomsbury Conservation Area and the Alfred Place/Tottenham Court Road sub area. Minerva House is a Grade II Listed Building, and although Telephone Exchange is not afforded a statutory listing it is considered a positive contributor within the Conservation Area.
- 2.5 The site has a PTAL (Public Transport Accessibility Level) rating of 6b, the highest possible rating. In addition to nearby bus stops, Goodge Street Underground Station is located less than a 100m walk to the east of the site. Indeed, within a 13-minute walk are the Underground Stations at Warren Street, Euston, Tottenham Court Road and Russell Square.
- 2.6 In terms of scale, both buildings comprise a lower ground, ground and three levels above. The surrounding buildings on Tottenham Court Road vary in height from 5 to 7 storeys. Along Chenies Street, opposite the site, building

heights range from 4 to 7 storeys. Within this area, it can be seen that the fourth, fifth, or six storeys are characterised by setback mansard roofs.

#### *Site Designations*

- 2.7 Within current policy, the site is located within the Bloomsbury Conservation Area, the Central Activates Zone (CAZ) and within the boundary of the Fitzrovia Area Action Plan (FAAP) (2015). Further to these designations, the site also lies within a rail safeguarding area.

#### *Planning History*

- 2.8 The relevant planning history associated with the site is outlined below.
- The change of use for office use was permitted at the site in August 1997 (Ref:PS9704463) and following this, alterations to the front elevation at ground and basement levels, the formation of a basement area with steps up and a metal railing adjacent to the pavement; alterations to some of the windows on the rear and side elevations and the installation of plant on the rear of the roof was permitted in 1998 (Ref: PS980400R2).
  - Listed Building Consent (Ref:2019/6243/L) was granted at 1-4 Minerva House in March 2020 for the replacement of damaged slates to part of the front facing roof pitch including new breather membrane and lead abutment flashing.
  - Consent was also granted (ref:2016/60000/L) for the installation of partition walls at ground to third floor levels in December 2016. Application ref: 2016/1515/L was also granted in December 2016 which allowed for internal alterations to include alterations to partitions at ground, 1st, 2nd and 3rd floors level of office building.

- In 2013, application (ref: 2013/2959/L) allowed for works to be undertaken to the reception/ground floor area and internal alterations to partitions at ground floor level.
- Prior to these applications, planning permission was granted under reference (ref. 2010/4322/P) which permitted internal and external alterations to existing office building (Class B1) including installation of roof mounted solar panels; erection of eight condenser units within light well to south west elevation; repairs to chimney stack, roof, parapets, gutters, and facades; new level access at ground floor level; refurbishment of toilet areas; and replacement of lift.
- Planning permission was granted at The Telephone Exchange in October 2010 for the erection of solar panels at main flat roof level, a new air-handling unit and four condensers at rear second floor flat roof level and the replacement of a condenser unit are rear/side ground level and new waterproof membrane to flat roof areas of office building (Class B1).
- In October 2010, permission was granted at The Telephone Exchange for internal and external alterations to existing office building (Class B1) including installation of roof mounted solar panels; erection of eight condenser units within light well to south-west elevation; repairs to chimney stack, roof, parapets, gutters, and facades and a new level access at ground floor level.



### 3. PRE-APPLICATION ENGAGEMENT

- 3.1 This section is primarily focused on the formal pre-application process with LBC. It should be read in conjunction with the Statement of Community Involvement (SCI), which is submitted as a separate document to accompany the planning application, and which explains all public and political engagement during the pre-application stage.
- 3.2 The application is not referable to the GLA as it does not exceed the relevant thresholds set out in the Town and Country Planning (Mayor of London) Order 2008 (as amended).

#### **Pre-application Discussions**

- 3.3 The proposed development represents the culmination of extensive pre-application discussions between the applicant, their team, and Council officers over a significant period of time.
- 3.4 Formal pre-application discussions have been undertaken with LBC on the evolving scheme since the 22<sup>nd</sup> September 2020. Subsequent meetings were held on the 9<sup>th</sup> November 2020, 4<sup>th</sup> March 2021 and 28<sup>th</sup> March 2021. The meetings have included discussions on the following matters:
- Bulk and Massing.
  - Details of Proposed Extensions.
  - Urban Design.
  - Facades and Materials
  - Townscape and Local Views
  - Internal and External Demolition; and
  - Mix of Land Uses.

*Land Use & Design*

- 3.5 LBC officers welcomed the addition of office floorspace and the comprehensive redevelopment of the site. Officers wanted to understand why residential could not be provided on site and the Applicant in response prepared some detailed housing studies outlining the practical and technical reasons as to why providing residential on site would be sub-standard.
- 3.6 LBC officers supported the approach to the retention and refurbishment of the existing buildings and the proposed replacement of the existing mansard on Telephone Exchange. Officers recommended that the Applicant looked to increase the expression of the three characters on site (Minerva House, Crescent and the Mews).
- 3.7 There was a number of discussions on the scale, form and massing of the proposed extensions. There were concerns relating to the scale and massing along Alfred Mews and from North Crescent. Revisions were made to address these concerns and the appearance of the building was further improved by receding the upper floors and forming a building height that is similar to the northern side of the mews which was considered an appropriate scale of development from street level.
- 3.8 Officers within pre-application advice noted that the design development of façade ideas were generally encouraging and showed a clear derivative of form and detail from the existing building, whilst taking a strong direction from low-carbon principles. However, they also noted that they would welcome alternative approaches to the detailed design and that the façade treatment of the additional storeys as seen in the important view from Alfred Place still needed to go further to relate sympathetically to the classically inspired period building on which they sit. The proposed extension has been significantly modified from earlier pre-application proposals and the façade rhythm and window size/layout directly derived from the building below. The Design and

Access statement details further how the Applicant responded to these comments.

- 3.9 Officers were concerned about the demolition and infill of the current lightwell within Telephone Exchange which in their view would have a negative impact on the sustainability potential of the scheme. This in turn would result in limited natural light within the central areas of the floorplan and compromised future flexibility of the building for alternative uses. The Applicant has carefully considered this response but is still seeking to remove this lightwell. The existing condition of the 'lightwell' is poor, dark and primarily for refuse storage. The central core within the existing 'lightwell' is paramount to the project; by locating the core here, minimal demolition is achieved. The proposed development is still BCO compliant from façade to core depth with the proposed solution. Retaining the existing building and limiting the demolition where possible is in accordance with the Council's Policy CC1 (Climate Change mitigation). Due to the aforementioned 'soft core' and design for disassembly, future flexibility of relocating the core is achievable.

#### *Consultation*

- 3.10 A series of targeted public engagement activities have taken place to present the proposed scheme to local residents and stakeholders. This has taken place in conjunction with pre-application discussions with LBC.
- 3.11 Engagement with local residents and the wider community has comprised targeted mailouts and a consultation website as outlined below:
- October 2020 - introductory meeting with The Bloomsbury Conservation Area Advisory Committee (BCAAC) to present the proposals
  - November 2020 – a further meeting took place with the BCAAC

- June 2021 – a newsletter outlining the proposals for the site and detailing the virtual consultation was sent to an area around the site, which contained c.1519 addresses.
- 21st June – 6th July - The consultation website was launched, with virtual exhibition boards and the opportunity to leave feedback.
- June 2021 - The project team conducted a site tour with the BCAAC to discuss the proposals further
- July 2021 - a follow-up newsletter outlining the proposals for the site and detailing the virtual consultation was sent to an area around the site, which contained c.1519 addresses.

3.12 Feedback to date has been broadly positive, with stakeholders and respondents recognising that a sensitive approach to refurbishment could be beneficial to the existing buildings and would not substantially impact their heritage.

3.13 Full details of the pre-application consultation process and responses received are included within the SCI prepared by Kanda which accompanies the planning application.

## 4. THE PROPOSED DEVELOPMENT

4.1 This application seeks Full Planning and its associated Listed Building Consent for the following development:

*“Refurbishment and reconfiguration of the existing buildings; including a one storey extension, plus plant, minor demolition works associated with internal and external alterations to provide additional office accommodation and associated works.”*

4.2 The Design and Access Statement submitted with this application fully illustrates and describes the proposed development.

4.3 The proposed development aims to create a vibrant and animated development with high-quality modern office workspace. It has been configured to accommodate either single or multiple occupiers.

4.4 The vision for the site is to provide a high-quality sustainable development of exemplary design which complements and integrates with the surrounding context; whilst meeting the objectives of the Camden Local Plan (2017) and London Plan (2021).

4.5 The proposed development is well considered and will enhance the site and its contribution to the local area in terms of use and townscape, successfully integrating the retained elements of the listed building.

4.6 The development will play an important role in providing new commercial floorspace in the Central Activities Zone. The key objectives from the outset has been as follows:

- Provide office floorspace across all floors.
- Retention of the listed building and sensitive refurbishment and reconfiguration.
- Refurbishment and reinstatement of heritage assets.
- Removal of existing ‘piecemeal’ massing to Telephone Exchange.

- Removal and replacement of the non-original mansard to Telephone Exchange.
- Retention of existing fabric where possible and repair façades extensively which reduces embodied carbon emissions through the re-use of material and reduced construction.
- Replacing the existing windows with fenestration of a similar expression and remove retrofitted elements facing onto Alfred Mews.
- One storey extension set back across Telephone Exchange and Minerva House.
- Provide a highly sustainable development.
- Consolidation of plant across both buildings where possible.
- Improvements to public realm and greenery within the site boundary.
- Removal of Non-original mansard and plant/core elements. Floor levels unified across Telephone Exchange.
- Provide a high-quality development in keeping with the local context.
- Provide active street frontage at ground level.

4.7 The existing and proposed floorspace areas to be provided by the development are outlined below.

Use	Existing Area (GIA)	Proposed Area (GIA)	Uplift
Office (Class E)	5,515	8,217	2,702

### *Design*

4.8 The proposed development is designed by award-winning architectural practice Morris+Company. It will be of a high-quality architecture and is based on a clear understanding of the site and its relationship with its context. The detailed design has evolved through extensive pre-application discussions with LBC as set out in section 3.

- 4.9 The design is driven and measured by a number of key principles. The proposed development seeks to express the building's functional requirements with a bold architectural response to the brief, built context and energy efficiency. These principles have guided the design process and have been refined during consultation with the Council.
- 4.10 The proposed development respects the main profile and elevation of Minerva House and confines additional accommodation to the flat roofed area to the rear of the building on Alfred Mews, behind the retained pitched roof on the crescent. The principal location for new office accommodation is Telephone Exchange. The proposed development replaces the existing 3rd floor mansard with a new floor whose vertical face extends to form a solid balustrade to a new set back 4th floor above. The top of the balustrade sits below the top of the adjacent parapet to Minerva House.
- 4.11 The development, as well as extending the buildings to provide more and better employment space, will see the repair and enhancement of building fabric where required. The proposed scheme will combine Minerva House and Telephone Exchange to create a single, accessible building with a more commercially efficient quantum of floorspace. The scheme will preserve the identity of the two buildings as they face the crescent; additional accommodation will be provided above and behind that frontage.

### ***Transport***

- 4.12 In line with London Plan and LBC Local Plan aspirations, it is proposed that the scheme will be a car-free.
- 4.13 The long-stay and short-stay requirements incorporate an uplift of 20% of the standards provided within the London Plan requirements, representing a very high provision of cycle parking for the site.
- 4.14 It is proposed to provide 141 long stay spaces within the building, with the majority provided at basement level, and some accessible stands provided at

ground floor level. The basement-based cycles stands will be accessible via North Crescent, with access accommodated through a gullied set of stairs, and a lift. The accessible spaces will be accessible via Alfred Mews in order to provide level access to the cycle store from street level. This has been designed with accessibility consultant input. The proposed short stay cycle parking requirements for the proposed development are not provided within the proposed development, but rather accommodated within the proposed public realm proposals on North Crescent. Further discussions are required with LBC Highways regarding the location on public highway.

- 4.15 15 showers and 141 lockers are proposed to be provided as supporting cycling facilities

#### ***Public Realm***

- 4.16 The scheme proposes transformational public realm improvements to the site. LDA Design were commissioned by the Applicant to provide landscape design proposals for the public space within Alfred Place, North Crescent and to address the Eisenhower Centre. The aim is to supply a public offering for the North Crescent, comprising Public Realm, ecological benefits and habitat creation.

- 4.17 The design approach for the project is all about creating a beautiful place achieved through a combination of three ideas:

- Introducing planting and rich biodiversity.
- Ensuring some ability for the space to be curatable.
- Delivery of a public, sociable and collaborative place.

- 4.18 Further dialogue will need to progress between TFL (as landowners of the Eisenhower Centre), LBC and the client on the future delivery of the proposals. These proposals are fully detailed within the Design and Access Statement.

- 4.19 An increase in planting and biodiversity at the Eisenhower Centre will see an increase in greening. Furthermore, it is anticipated that pedestrianisation of



the space around the Eisenhower Centre would be provided as well as additional seating, cycle parking and a curatable exhibition space would be provided.

### ***Sustainability***

- 4.20 A sustainable approach is paramount to the proposal. The Applicant has prioritised sustainable strategies and accreditations in the design decision making process to ensure an exemplar project that aligns with Camden's 2025 objectives. It is proposed to include sustainable materials procurement policy along with an efficient waste strategy.
- 4.21 The proposals aim to retain as much existing fabric as well as using strategies to minimise carbon impacts. The current supply of electricity will be improved to reduce current and future energy usage. It is anticipated that the proposals will allow a reduction in carbon emissions and efficient sanitaryware will seek to reduce water consumption by 50%.
- 4.22 In accordance with the requirements in Policy CC2 Adapting to climate change, a BREEAM pre-assessment has been prepared and the site currently achieves a score of 71.2% equating to an 'Excellent' rating.

## 5. PLANNING POLICY FRAMEWORK AND OVERVIEW

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless other material considerations indicate otherwise.

5.2 As such, this section provides a summary of the key planning policies relevant to the site. The planning policy context comprises national, regional and local levels. Within each level there is both planning policy and guidance which combine to provide the framework for consideration of the proposed development.

5.3 In addition to the National Planning Policy Framework (NPPF), the key planning policy documents taken into account at this stage, and referred to in this planning statement, include those that are listed below.

- London Plan (2021).
- Camden Local Plan (2017).
- The Fitzrovia Area Action Plan (FAAP) (2014).

### ***National Planning Policy Framework (NPPF)***

5.4 The NPPF establishes the overarching principles of the planning system, including the requirements of the system, including the requirement of the system to 'drive and support development'. The NPPF retains the main principles of the previous version and should be read as a whole.

5.5 The NPPF was revised on 20 July 2021 and sets out the government's updated planning policies. Some of the key changes see a strengthened requirement around design quality and the use of greener infrastructure in new developments.

5.6 Paragraph 11 confirms that at the heart of the NPPF there is a presumption in favour of sustainable development. It is confirmed that for decision taking, this means:

*“c) approving development proposals that accord with an up to date development plan without delay; or*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless: -*

*i) the application of policies in this framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

*ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole.”*

5.7 Paragraph 12 confirms that: *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up to date development plan...permission should not usually be granted. Local authorities may take decisions that depart from an up to date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”*

5.8 Chapter 4 of the NPPF relates to decision making. Paragraph 38 states that *“Local planning authorities should approach decision on proposed development in a positive and creative way. They should use the full range of planning tools available. Including brownfield registers and permissions in principle and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible.”*

5.9 The NPPF includes a section on making effective use of land. This states that planning policies and decision should promote an effective use of land in

meeting the need for new homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

- 5.10 Paragraph 122 states that planning policies and decision should support development that makes efficient use of land, taking into account identified needs, market conditions, the availability of infrastructure, the desirability of preserving an areas character or promoting regeneration and change, and the importance of securing we designed attractive and healthy places.
- 5.11 Paragraph 124 states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, as it creates better places in which to live and work and helps to make development acceptable to communities.
- 5.12 Paragraph 127 provides criteria for policies and decision to ensure that developments function well, have good architectures, are sympathetic to local character and history, establish a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, inclusive and accessible.
- 5.13 The NPPF sets out a range of measures to promote healthy and safe communities, including open space and recreation, to promote sustainable transport and achieve well designed places. Applicants are advised to work closely with the community (paragraph 128), and local authorities should make appropriated use of processes for improving design, including design advice and review, including the recommendations of design review panels (paragraph 129).
- 5.14 Paragraph 130 states (inter alia) that:

*“Planning permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way that it functions, taking into account any local design*

*standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plain policies, design should not be used by the decision maker as a valid reason to object to development.”*

- 5.15 Section 16 of the NPPF relates to conserving and enhancing the historic environment. This updates the previous version of the NPPF, but largely relates to the well-established principles set out in the previous version and by subsequent legal decisions. In summary, paragraph 193 restates the general principle that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amount to substantial harm, total loss or less than substantial harm to its significance.

***London Plan (2021)***

- 5.16 The London Plan (2021) was adopted in March 2021 and as such is now a material consideration and part of the Development Plan.

***Local Planning Policy: Camden Local Plan (2017)***

- 5.17 At local level, Camden’s Local Plan (2017) was adopted by Council on 3rd July 2017 and provides the basis for planning decisions and future development in the borough.
- 5.18 The Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011) is of relevance to these proposals. This document provides guidance on development with the Conservation Area and defines its special interest.

***Supplementary Guidance***

- 5.19 Supplementary Planning Guidance and Documents (SPG’s and SPD’s) are also material planning considerations. Those that are considered of relevance to this application are noted below.

***Mayoral Supplementary Guidance:***

- The Mayor's Air Quality Strategy (2010);
- The Mayor's Energy Strategy (Feb.2010);
- The Mayors Transport Strategy (May 2010);
- Central Activity Zone (CAZ) SPG (March 2016); and
- Accessible London: Achieving an Inclusive Environment (2014).

***Local Guidance:***

The Council have a number of supplementary documents to provide guidance on adopted policies.

- Access for All – Camden Planning Guidance (March 2019).
- Air Quality – Camden Planning Guidance (January 2021).
- Amenity – Camden Planning Guidance (January 2021).
- Basements – Camden Planning Guidance (January 2021).
- Design – Camden Planning Guidance (January 2021).
- Developer Contribution – Camden Planning Guidance (March 2019).
- Employment Sites and Business Premises – Camden Planning Guidance (March 2018).
- Energy Efficiency and Adaptation – Camden Planning Guidance (January 2021).
- Housing – Camden Planning Guidance (January 2021).

## 6. PLANNING POLICY ASSESSMENT

6.1 This section assesses the proposed development against relevant policy and planning guidance.

### *Principle of Development*

6.2 The principle of the proposed development accords with current planning policy guidance. National Policy, the London Plan and the Local Plan all seek to ensure that the development achieves the highest possible intensity of use compatible with the local context in order to deliver a scale of development which makes the most effective and efficient use of land.

6.3 Paragraph 7 of the NPPF outlines that *“the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”*

6.4 Camden Council’s overarching objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for their residents and businesses.

6.5 The Council has developed a series of objectives for the Local Plan to achieve its vision. The strategic objectives of the Plan are as follows:

- i) Developing new solutions with partners to reduce inequality and improve health and wellbeing.
- ii) Creating conditions for and harnessing the benefits to economic growth; and
- iii) Investing in our communities to ensure sustainable neighbourhoods

6.6 The proposals for the site, in terms its uses, architectural quality and the provision of additional commercial space, meets the above policy

requirements and will set an excellent benchmark for future developments within the area.

- 6.7 The proposed development is considered to achieve sustainable development since it meets all the above key planning principles for development of the site. The proposed development is a brownfield site located in a highly accessible location by public transport in London.
- 6.8 For these reasons outlined above, the principle of the proposed development is consistent with the broad objectives of planning policy and in accordance with the Government's overarching objectives for sustainable growth. The proposed development is acceptable in principle and should be supported in this location.

#### ***Land Use***

- 6.9 The principle of developing this site to deliver high quality office (Use Class E) space is well established through all levels of planning policy.
- 6.10 The NPPF (2019) at Chapter 6 seeks to provide policies that contribute towards building a strong, competitive economy. Paragraph 80 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It is stated 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.
- 6.11 The site is located within the CAZ. Policy E1 of the Camden Local Plan notes that the Council will support businesses of all sizes and maintain a stock of premises that are suitable for a variety of business activities, for firms of different sizes, available on a range of terms and conditions with differing resources.
- 6.12 Policy SD4 of the London Plan sets out the strategic function of the CAZ. Supporting paragraph 2.4.8 notes that a supportive policy approach to the wide variety of business space requirements.



6.13 Specifically, in relation to office use, Policy E1 of the London Plan outlines that improvements to the quality, flexibility and adaptability of office space should be supported through new provision, refurbishment and mixed-use development. Part G of this policy outlines that development proposals relating to new or existing office space should take into account the need for a range of workspaces including lower cost and affordable workspaces.

6.14 Policy E2 of the London Plan looks to local authorities to support the provision of office space. In accordance with this policy, the Council will encourage the provision of employment premises and sites in the borough and those that support the functioning of the CAZ or the local economy. Furthermore, this policy also notes that the Council will consider higher intensity redevelopment of sites suitable for continued business use, provided that:

- The level of employment floorspace is maintained or increased.
- The redevelopment retains the existing business as far as possible, or if any relocation of businesses is to occur as a result of the development, demonstration that the relocation is not harmful to the functions of the CAZ.
- If the proposed floor space includes premises suitable for start-ups, small and medium sized businesses, such as managed affordable workspaces where possible.
- The scheme increases employment opportunities for locals.
- 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.

6.15 Policy G1 of the CLP aims to deliver growth by securing high quality development through promoting and supporting development that makes the best use of the site and supporting a mixed use. It notes that the Plan seeks to meet Camden's strategic growth objectives up to 2031 by providing 695,000sqm of office floor space and development. One of the key priorities

for delivering growth and harnessing its benefits include *“supporting businesses and job provision by providing or retaining suitable premises to support businesses staying or expanding within Camden.”*

- 6.16 Furthermore, the importance of office floorspace is recognised within the LBC Local Plan:

*“The high concentration of property, banking and service activities and large number of publishing and media businesses in the borough mean that a significant number of Camden’s jobs are in offices. The Camden Employment Land Review 2014 forecasts that the demand for offices will increase by 695,000sqm between 2014 and 2031. To meet this demand, the Council will direct new office development primarily to the growth areas and Central London.”*

- 6.17 The principle of additional office accommodation at this site accords with local policies E1, E2 and G1 as set out above, along with the Fitzrovia Area Action Plan, and should therefore be supported.

### ***Employment & Skills***

- 6.18 It is estimated that the construction phase of the proposed development would create 330 jobs years across a 29-month demolition and construction period. This is equal to an average of approximately 135 workers on-site over the construction period. It is expected that construction workers on-site would spend a total of £541,000 in the local area over the duration of the entire construction and demolition period.

- 6.19 Policy E2 outlines that the council will encourage the provision of employment premises and sites in the Borough. For existing business sites, the council supports higher intensity redevelopment of premises or sites that are suitable for continued business provided that the level of employment floorspace is increased or at least maintain and where the scheme would increase employment opportunities for local residents, including training and

apprenticeships. The proposed development would provide a significant uplift of economic activity, with the office space expecting to accommodate circa 460 gross FTEs, corresponding to 495 jobs when accounting for part-time working patterns. Compared to the existing site, the proposed development would provide an uplift of approximately 115 FTEs (125 jobs) – a 33% uplift.

- 6.20 In total, the existing workers are estimated to spend £745,000 per annum at the site, whilst the uplift in employment by the proposed development would increase this by £247,000 to a total worker spend of £995,000 per annum. This increase in worker expenditure equates to a 33% uplift when compared to the existing site.
- 6.21 The proposed employment and skills commitments have been designed to align with the policy and obligations contained within the borough Local Plan and LBC Employment Sites and Business Premises Supplementary Planning Document (SPD), wherever it has been possible to do so.
- 6.22 The Applicant will use reasonable endeavours to ensure that 20% of construction jobs go to LBC residents, equating to 65 job years. Additionally, the Applicant will work in partnership with King's Cross Construction Skills Centre (KXCSC) to ensure Construction Industry Training Board (CITB) benchmarks are met or exceeded when recruiting construction-related jobs. All jobs will first be advertised through KXCSC and Camden Job Centres, in line with LBC policy.
- 6.23 The Applicant will also seek to maximise employment opportunities for LBC's resident population at the end-use stage of development. The Applicant will use reasonable endeavours to broker a meeting between the end-use occupier and the Council's Economic Development Service. The Applicant will encourage the end-use occupier, in liaison with Camden's Economic Development Service, to promote opportunities for local LBC residents and advertise through Camden Job Centres and other local employment vehicles.

6.24 Additionally, the Applicant will also encourage end-use occupiers to target hard-to-reach priority groups, agreed with the council, suffering disproportionately from unemployment or low skills when seeking to fill vacancies arising at the proposed development, where it is legally possible to do so. The Applicant is also contributing towards this through the Stanhope Foundation. The Foundation was established in 2021 with the goal of creating employment opportunities for those furthest from the labour market and encouraging Londoners into work. The aim of the foundation is to improve human potential and raise capital through various initiatives in order to help Londoners reach their own personal potential through meaningful employment. The foundation would work locally in LBC if the proposed development were permitted, discussing and agreeing objectives with LBC economic development officers. It is envisaged that the work of the Stanhope foundation would help to achieve these targets of providing opportunities to hard-to-reach groups.

#### ***Affordable Workspace***

6.25 Affordable workspace is defined as workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. These types of workspaces are an integral part of London's ecosystem for creative and technology innovation, and include business incubators, accelerator spaces, and creative production spaces. Affordable workspace helps to meet key objectives of small and medium enterprises (SMEs) and local businesses, including introducing flexibility in internal arrangements, creating a range of shared spaces and business facilities, enabling high speed broadband connection, and permitting on-site business support provision.

6.26 The London Plan promotes and supports the provision of affordable workspace. It does not, however, specify the percentage quantum of new development that should be affordable workspace, nor the rate at which it

should be priced. It is delegated to the local authority to decide on such matters.

- 6.27 London Plan Policy E3 also promotes and supports the provision of affordable workspace but does not specify the percentage quantum of new development that should be affordable workspace, nor the rate at which it should be priced. Similarly, to the current London Plan, these decisions are delegated to the local planning authority.
- 6.28 CLP Policy E2 states that ‘higher intensity’ redevelopment, e.g. medium and major scale office-based developments must: *“include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;”* (part f.) The LBC policy position is similar to the London Plan in the respect that it does not specify an explicit quantum of floorspace that is required to be set at affordable rates within their local plan.
- 6.29 Camden Planning Guidance Employment Sites and Business Premises (2018) acts as a planning guidance document, which is supplementary to the Camden Local Plan. Within this document it is stated that LBC will: *“Seek to use planning obligations to secure an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000sqm (GIA or gross internal area) or more. The cost per square foot or per workstation that would be considered affordable will vary according to a range of factors such as location, type, quality, etc.”*
- 6.30 The Applicant is proposing 10% of the uplift in NIA floorspace which equates to circa 137 sqm at a 25% rental discount.

#### ***Mixed Use/Affordable Housing***

- 6.31 Policy SD4 of the London Plan notes that the role of the CAZ (being mixed use, with a mix of strategic functions) should be promoted. Policy SD5H notes that new residential development should not compromise the strategic functions of the CAZ, outlining that offices and other CAZ functions should be given

greater weight relative to new residential development of all areas of the CAZ. Policy SD5H sets out that residential or mixed-use development proposals should not result in a net loss of office floorspace in the CAZ unless there is no reasonable demonstrable prospect of the site being used for offices.

6.32 London Plan Policy H5 requires major developments which trigger the affordable housing requirements to provide housing through the threshold approach. Policy H4 of the Local Plan expects a contribution to affordable housing from all developments that involves a total addition of 100sqm GIA or more. LBC will seek to negotiate the maximum reasonable amount of affordable housing, however, where affordable housing cannot practically be provided on site (or offsite provision would create a better contribution in terms quantity and/ or quality), the Council may accept provision of affordable housing offsite in the same area, or exceptionally a payment-in-lieu.

6.33 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. In the specified areas, the Council will consider whether self-contained housing is required as part of a mix of uses taking 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.*

*Where housing is required as part of a mix of uses, we 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, they will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.*

- 6.34 Policy H2 will be triggered as the scheme provides additional floorspace greater than 200sqm. The next section provides an assessment of the scheme against policy H2 and why it is not feasible to provide residential on site.
- 6.35 In accordance with policy H2, the quantum of residential on site required is as follows:

Use	Existing Area (GIA)	Proposed Area (GIA)	Uplift	Requirement under H2
Office (Class E)	5,515	8,217	2,702	1,351

#### *Response to Policy H2*

*1) Where housing is required as part of a mix of uses, Camden will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed*

- 6.36 There is a strong policy basis for providing office floorspace on this site. The site lies within the Central London Area and benefits from a series of land use designations, all formulated to encourage growth and regeneration.
- 6.37 The site is located within the Central Activities Zone (CAZ). The CAZ is the vibrant heart and globally iconic core of London. It is one of the world's most attractive and competitive business locations. Policy 2.11 of the London Plan sets out the strategic functions of the CAZ. The Policy outlines that Councils should seek solutions to constraints on office provision imposed by heritage

designations, without compromising local environmental quality, including through high quality design to complement the designation.

- 6.38 London Plan Policy SD5 states that “*new residential development should not compromise the strategic functions of the CAZ.*” It goes on to state that “*Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in all other areas of the CAZ except: 1) the Vauxhall, Nine Elms, Battersea and Elephant & Castle Opportunity Areas, where offices and other CAZ strategic functions are given equal weight relative to new residential; and 2) wholly residential streets or predominantly residential neighbourhoods (with exceptions in appropriate circumstances – for example clusters of specialist CAZ strategic functions, Special Policy Areas and CAZ retail clusters).*”
- 6.39 Policy E1 of the London Plan aims to promote the improvement to the quality, flexibility and adaptability of office spaces of different sizes. Policy E1 of the CLP notes that the Council will support businesses of all sizes and maintain a stock of premises that are suitable for a variety of business activities, for firms of different sizes, available on a range of terms and conditions, with differing resources.
- 6.40 The strategic importance of office in this location is clear. There is an opportunity to provide a significant office offer that will ‘support and improve’ the CAZ for its residents and workers. Incorporating additional residential would be contrary to the flexibility that the applicant is seeking in this instance and the site would be less attractive to potential occupiers.
- 6.41 Policy at a national, regional and local level all support economic growth within the Central Activities Zone. The London Plan recognises that new residential development should not compromise the strategic function of the CAZ and offices and other functions.
- 6.42 The first point to take into consideration is that there are headlease restrictions (from City of London who are the freeholder) that prohibit residential use on



site. The lease as outlined explicitly states that “ not *without the consent in writing of the Landlord such not to be unreasonably withheld or delayed to use the Premises otherwise than as offices within B1 (Business) of the 1987 Order and purposes ancillary to such use provided that no part of the premises shall be used for residential purposes or as a hotel.*”

6.43 In addition to the above, the design team explored the opportunities for residential floorspace onsite at the site as part of the pre-application process. The quantum of residential floorspace explored has been tested against the considerations contained within Policy H2, in particular the impacts of providing residential floorspace on the character of the development, the quantum of residential floorspace required and the compatibility with the existing office uses already on site.

6.44 Morris+Company put together a pack of information to show where residential floorspace could theoretically be incorporated. The study showed that residential floorspace, could, if required be located within the building (discounting the lease implications). However, it is clear that providing this residential accommodation would be sub-optimal for the following reasons:

- Minerva House is listed and due to the nature of the existing structure there is potentially extensive remodelling works to the structure to accommodate new flats which would have significant impacts to the Grade II listed building.
- The proposed development is not proposing major demolition and any residential development would need to work within the constraints of the existing building.
- There is limited existing level access and if residential was to be included there would be reduced accessibility in comparison to a standalone residential development.

- There is currently insufficient pavement on mews for a dedicated pedestrian entrance.
- One most notable key internal consideration is the differing floor plate levels between the two adjacent buildings. Any unification to accommodate flats will require significant structural work across both sites.
- The floorplates would be inefficient, and the quality of the new flats would be reduced.
- There is no opportunity on site to include the amenity and play space requirements for residential dwellings. To incorporate amenity, extensive works would be required to the listed and significant facades.
- The residential units would be single aspect.
- There would be inefficient daylight to the new flats.
- There are differing regulatory requirements regarding fire safety between office and residential which provides further constraints.
- Secure by design implications between the commercial and residential units requiring multiple entry points and cores.
- The overall quality of the residential accommodation would be poor.
- Impacts at basement level by introducing residential elements. Additional plant in addition to what is required for the office, would be required for the residential and due to the limited space within the basement, more extract and plant would be required to be located on the roof which in turn would impact upon the surrounding.

6.45 Whilst residential floorspace could theoretically be incorporated on site, it would be considered sub-standard in a high value area. Not only would introducing residential decrease the level of office floorspace (including

affordable office) provided, but it would compromise the office floorplate. The principle of this would be a concern for office tenants, and it would likely cause amenity issues in terms of any potential service programme for the building.

6.46 In addition to the physical constraints, providing residential development at this site will:

- Fragment ownership where the units are for sale. Different management structures for the commercial and residential elements are required, even if the residential units are retained for rent.
- Increase costs associated with the need for separate entrances and servicing.
- Providing residential and office will create inefficiencies in the building itself, increasing service charges and creating opportunity costs.

*i) Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, they will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.*

6.47 A housing viability report has been prepared by DS2 and is submitted alongside this application. The results demonstrate that the proposed development cannot viably support the provision of any contribution towards C3 housing, including affordable housing, on a present-day basis. This includes any time of contribution including an off-site contribution or a payment in lieu of C3 housing/affordable housing. A housing contribution would further constrain the viability of project and reduce the ability to deliver the Proposed Scheme.

6.48 Further discussions are therefore required with the Council and their advisors on the principle of residential. Any quantum of off-site residential proposed will be a function of the agreed viability position.

## Design

- 6.49 This planning statement addresses the land use context of the proposed development, showing how the proposal will meet the land use objectives for the site and complement existing land uses in the area. The Design and Access Statement accompanying the planning application provides an analysis of the constraints and opportunities presented by the site and how the design of the proposed development has evolved and responds to these. It sets out the design objectives, urban design principles and building design principles which have informed the final design of the proposals.
- 6.50 Chapter 12 of the NPPF (2019) concerns the achievement of well-designed places. It advises that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve.
- 6.51 Paragraph 131 provides that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 6.52 Policy D1 of the Local Plan outlines that the Council will seek to secure high quality design in development using a number of criteria including, but not limited to the list of matters below:
- Respects local context and character.
  - 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.
- Promotes health.
- Is secure and designed to minimise crime and antisocial behaviour.
- Responds to natural features and preserves gardens and other open space.
- 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, incorporates outdoor amenity space.
- Preserves strategic and local views.
- Provides a high standard of accommodation.
- Carefully integrates building services equipment.

6.53 The London Plan sets out that an understanding of the existing character and context of an area is essential in determining how best to develop places. Policy D3, *Optimising site capacity through the design led approach*, confirms that development is to make the best use of land through a design led approach that will optimise site capacity. The form of development should respond to the site's context and its capacity for growth. In terms of form and layout, buildings are expected to respond to local distinctiveness, encourage and facilitate active travel, facilitate efficient servicing and maintenance and have clearly defined public and private environments. Architecture should pay attention to detail and consider use, flexibility and the building lifespan.

6.54 Policy D4, *Delivering Good Design*, seeks to maintain design quality and ensuring that the quality of development should be retained through to completion.

6.55 The Camden Planning Guidance: Design document, outlines the Council's promotion of excellence in design. This includes the use of high quality

materials, the design of the building as well as its use and function, the use of sustainable materials, creating good quality public realm, considering opportunities to promote health and well-being and looking for opportunities to improve the character and quality of the area.

- 6.56 The proposed development demonstrates a high-quality design that has taken cues from the surrounding context to ensure that it sits well within the street scene and adds architectural value to the area. Great care has been taken to ensure that the design and construction is as sustainable as possible, and the space has been specifically designed to be flexible, being able to accommodate a larger tenant or a number of smaller tenants.
- 6.57 The proposed design works with the existing key features of the two buildings and aims to enhance them. A palette of high quality, durable materials are proposed for the site. The tones and colours have been specifically considered to fit within the surrounding context and complement the buildings.
- 6.58 In terms of massing, the proposed extension at Telephone Exchange will be set back from the existing façade. This set back will ensure that the extensions can be read as an addition to the site, whilst also ensuring the development does not appear too overbearing from the public realm.
- 6.59 The proposals have been designed by acclaimed architects Morris+Company. The proposed development in accordance with policy D1, will:
- Create a building of architectural distinction that will improve the quality of the immediate area and contribute to the architectural richness of Fitzrovia.
  - Respond positively to surrounding context as set out in the Design and Access Statement.

- Be of an exceptional design quality shown through the materials and of an architectural expression that would complement the appearance of the area.
- Provide a highly permeable and active ground floor which works with the public realm proposals to transform the site and its immediate surroundings in terms of permeability, legibility and the quality of the pedestrian environment.
- Key focus on environmental considerations and which were considered from the outset of the design with a holistic approach to the development to ensure and result in an excellent energy and low carbon performance and a future-proofed asset for decades to come.
- Be designed for climate resilience, embedding mitigation measures to ensure a future proofed development.
- Significantly enhance the proposals green infrastructure through green roof design and soft landscaping.
- Application of principles of circularity to optimise material efficiency, future flexibility and adaptation and minimising waste on site

6.60 To ensure compliance with Paragraph 127 of the NPPF, Policy D1 of the CLP and Camden Planning Guidance; Access for All, a Planning Access Statement (prepared by David Bonnett Associates (DBA)) accompanies the application and details the access provisions for the site and detail the step free external and internal routes, as well as lifts, stairs and WCs. The report considers the requirements of staff, visitors and the wider community, including people with mobility impairments; people with visual impairments; people with neuro-diverse requirements; deaf people; older people and small children.

### ***Heritage***

- 6.61 National planning guidance on the historic environment is provided by the NPPF. It defines what constitutes the historic environment, including ‘heritage assets’ (which can be designated or undesignated), and sets out the policy approach to assessing development proposals which affect heritage assets either directly or in terms of their setting.
- 6.62 Designated heritage assets include World Heritage Sites, listed buildings and conservation areas among other designations.
- 6.63 London Plan HC1 States that heritage conservation and growth will replace Policy 7.8 of the adopted London Plan (Ref 1-7) and states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.
- 6.64 Policy D2 of the CLP is relevant when assessing designated heritage assets. The policy notes that the Council will not permit the loss of or substantial harm to a designated heritage asset unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss or, all of the following apply:
- the nature of the heritage asset prevents all reasonable uses of the site.
  - no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation.
  - conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
  - the harm or loss is outweighed by the benefit of bringing the site back into use.
- 6.65 With regards to listed buildings Policy D2 of the CLP notes that LBC will:
- resist the total or substantial demolition of a listed building;



- resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- resist development that would cause harm to significance of a listed building through an effect on its setting.

6.66 The Design Planning Guidance (SPG) Document for Camden outlines that applicants will need to show how the significance of a heritage asset, including any contribution made by their setting has been taken into consideration into the design of the proposed works. Paragraph 3.35 of the SPG notes that *the Council will not permit development that result in harm that is less than substantial to the significance of a designated heritage asset unless the public health benefits of the proposal outweigh that harm.* “Substantial harm” is quite a high test. The SPG notes that where there is a development where the loss of heritage asset is considered likely to be substantial, Council will consider the *relevant NPPF tests on levels of harm, heritage conservation as a public benefit in itself, optimum viable use, levels of harm and mitigating harm.*

6.67 THE FAAP also notes that new development should respond positively to the prevailing form of nearby buildings and frontages in terms of scale and grain, particularly for listed buildings, and spaces that make a positive contribution to the conservation areas.

#### *Heritage Assets*

6.68 The two buildings that comprise the site are located in Sub-area 4 of the Bloomsbury Conservation Area. The adopted conservation area appraisal (2011) identifies 5 North Crescent, 11 Chenies Street and the Eisenhower Centre as making a positive contribution to the conservation area. The boundary of the Bloomsbury Conservation Area runs along Tottenham Court Road; the Charlotte Street Conservation Area lies to the west of Tottenham Court Road.

- 6.69 Minerva House at 1-4 North Crescent is a statutorily listed building (Grade II), as is 204-208 Tottenham Court Road immediately to the west. On the northern side of Alfred Mews, the Heals Building (including Habitat) is listed Grade II\*. A Grade II war memorial is positioned in front of the Eisenhower Centre. The Drill Hall Arts Centre and its railings on further east on the south side of Chenies Street are listed Grade II. There are no locally listed buildings in the vicinity of the site.
- 6.70 As set out within the accompanying Townscape, Heritage and Visual Impact Assessment prepared by KM Heritage, the proposed development is considered to reflect the main profile of Minerva House and addresses Telephone Exchange in a confident contemporary manner. The architectural treatment of the proposed new floors draws on the proportions and articulation of the floors below. Importantly, the scheme is considered to preserve the identity of the two buildings.
- 6.71 KM Heritage within their report confirms that the proposed development will *“represent a key step in the life of the buildings and townscape of this part of Bloomsbury. The scheme is clearly far less radical than the wholesale change that occurred in the Edwardian era, but will be important in enabling the buildings built at that time to continue to contribute to the character and appearance of the conservation area, and to the life and economy of the local area.”*
- 6.72 KM Heritage go on to state that the heritage significance of older buildings and areas can only be sustained by investment to repair and maintain those buildings. That implies a beneficial use that will secure them for the long term. This, in turn, frequently implies alteration and conversion to accommodate those uses. This, in turn, implies alteration and conversion that serves a demonstrable need, in a location and in a sufficient quantum, that is worth investing in. The proposed redevelopment of the buildings at North Crescent very plainly achieves these objectives. Changes to buildings of significance does not always harm the significance of the building. Alteration and extension

to historic buildings can be successful and positive if the architectural design of the proposals is of the highest quality. It is apparent that the balance is achieved in the proposed development, and the excellence of the design approach is evident. The architects examined a clear and rational set of options that build upon pre application discussions with the Council and represent an acute understanding of how to add to existing historic buildings.

- 6.73 The overall effect of the proposed development will be a very successful enhancement of Minerva House and the Telephone Exchange buildings and their surroundings. The buildings will be repurposed and their life extended, enlivening this part of Bloomsbury and contributing to Camden's and London's economy. The proposed development is considered to preserve and enhance the special architectural or historic interest of Minerva House, enhance the local townscape and the Bloomsbury Conservation Area over their present condition, as well as the setting of other heritage assets.
- 6.74 Nine townscape views have been identified in which the effect of the development will be tested. Figure 18 within the THVIA shows the viewpoint locations.
- 6.75 Analysis of the townscape views set out in the THVIA indicates that while the proposed scheme is prominent and will be visible in certain relationships with heritage assets and townscape features, it will also, by virtue of its specific location and relationship to intervening development, be screened in many views. There will be a clear improvement in the quality of the townscape in and around the application site over the present situation. The proposed development will enhance the appearance of this key site over its existing condition and it will create a well-designed development that will help to enliven and regenerate this part of Camden.
- 6.76 The THVIA carefully assesses whether harm is caused to the heritage assets. It concludes that *"the proposed development complies with Paragraph 199 and 201 of the NPPF in that it conserves the heritage assets in question. We do not*

*believe that the scheme involves any 'less than substantial harm to the significance of a designated heritage asset', but any such 'less than substantial harm' that may be ascribed to the scheme is greatly outweighed by the public and heritage benefits generated by the scheme in terms of helping to sustain the site in its 'optimum viable use' over the long term, satisfying paragraph 202."*

6.77 The report sets out that the proposed development, when considered in relation to legislation, policy and guidance, concludes that no harm is caused to special interest or significance. Change occurs to and in the setting of the heritage assets in question, but this change is positive and the proposed development will enhance Minerva House, the setting of other has and the character and appearance of the Bloomsbury Conservation Area their setting by virtue of its high quality design.

6.78 Where there is an absence of harm, planning policy does not require any justification to be provided for the development's relationship with designated heritage assets. Notwithstanding this, were the Council to take a different view, and assert that 'less than substantial harm' might be caused by the proposed development it is considered that any harm would at most be less than substantial and that the relevant paragraphs of the NPPF to consider in the determination of the proposals would be paragraph 199. As outlined above, paragraph 201 of the NPPF identifies:

*"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 securing its optimum viable use."*

6.79 The Planning Practice Guidance gives advice on what 'public benefits', means in this context. Such public benefits could be anything that delivers economic, social or environmental progress and should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit (18a-020-

20140306, paragraph 020). In this context, any harm, which would only be less than substantial harm, would be significantly outweighed by the resulting public benefits highlighted in Section 7 of this Planning Statement. In light of this, it is considered that, alongside the quality of architecture proposed and other public benefits of the scheme, the proposal decisively outweighs any perceived harm and is therefore acceptable in planning policy terms at the national, regional and local levels.

- 6.80 The enclosed Townscape, Heritage and Visual Impact Assessment, prepared by the KM Heritage and AVR London provides a further detailed assessment of surrounding heritage assets.

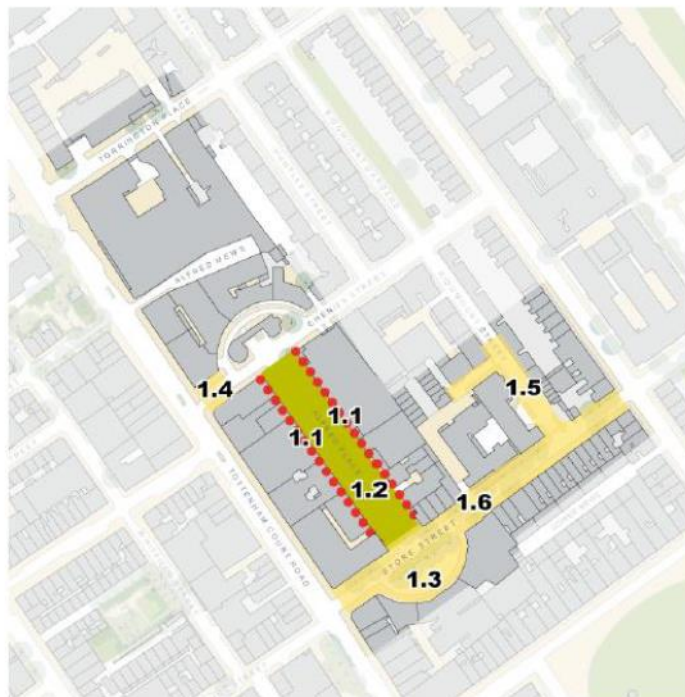
#### **Public Realm**

- 6.81 Policy D8 of the London Plan encourages opportunities to create public realm that is well-designed, safe, accessible, inclusive, attractive and well-connected with good quality and sustainable materials and designed appropriately to its context.
- 6.82 It is the aim of the proposed development to provide an improved public realm in and around the site and the high-level proposals are detailed within the accompanying Design and Access Statement (prepared by Morris+Company).
- 6.83 Policy A1, *Managing the Impact of Development*, sets out that the Council will seek to ensure that development contributes towards the creation of successful communities. To this end, public realm is identified as a key driver of regeneration and renewal. It is concluded that business are more likely to invest in areas which offer attractive spaces. Policy T1, *Prioritising Walking, Cycling and Public Transport*, identifies that development should seek to improve the pedestrian environment through high quality public realm improvement works.
- 6.84 Policy A2 of the Local Plan states that “*the Council will protect, enhance and improve access to Camden’s parks, open spaces and other green*

*infrastructure.” The Policy goes on to state that the Council will “conserve and enhance the heritage value of designated open spaces and other elements of open space which make a significant contribution to the character and appearance of conservation areas or to the setting of heritage assets.”*

- 6.85 The FAAP principles note that public realm should be designed to prioritise walking and cycling. The usage and frontage of buildings at the ground floor should create safe, attractive and active street frontages. The FAAP also notes that vehicle servicing from the main street grid should be minimised where possible.
- 6.86 The FAAP also strongly promotes the creation of new or improved public open space within new developments.
- 6.87 The Site lies within the Alfred Place Character Area within the FAAP.

Alfred Place Character Area



- 6.88 Within the designated area, the Council is looking to minimise traffic and create a better environment. The FAAP recognises that the Eisenhower Centre is a positive contributor but is of the view that the *“the entrance structure blocks views of buildings in North Crescent (including listed buildings), creates a poor setting for the Rangers’ memorial (also listed), and interrupts the symmetrical layout of Alfred Place and the North and South Crescents.”* The Council will encourage a scheme which will improve the setting of the Rangers’ memorial and improve the relationship between the Eisenhower Centre and the surrounding townscape. In addition, the Council identify their aspirations to create a widened footway at the eastern end of Chenies Street by reclaiming carriageway space.
- 6.89 LDA Design were commissioned by the Applicant to provide landscape design proposals for the public space within the Alfred Place, North Crescent and to address the Eisenhower Centre. The aim is to supply a public offering for the North Crescent, comprising public realm, ecological benefits and habitat creation.
- 6.90 The immediate public realm context of the site reveals important qualities that the landscape design proposals need to respond to in order to create the best contextual fit for the new development. The current streetscape is of a typical quality for this part of London, footpaths are uneven, a patchwork of tarmac repairs, ash-c parking and temporary signage litter the streetscape. The proposals planned for other new green spaces including Alfred Place Park have also been carefully considered to ensure a properly integrated, site responsive design strategy that includes:
- Potential for new connectivity through the site providing an alternative leisure route along Chenies Street.
  - Embody a sense of intrigue and curiosity which entices people into the crescent, welcomes them in and encourages exploration and dwell time.

- Potential for improvement in vibrancy, connectivity and quality of movement experience through the site.
- Consideration of the close proximity of office and businesses to the crescent perimeter and how existing and new landscape structure can be used to help achieve the best fit.

Opportunities for creating site specific design with a strong identity that is rooted in the special qualities of place

6.91 The concept will seek to draw together three strands to deliver the aspiration of the Garden Crescent:

- Uniting the North Crescent and Alfred Place with a complementary role, as part of a coordinated public space network.
- Deliver a permissible, accessible and welcoming public space that reinforces the inclusive philosophy of Alfred Place.
- Establish a new green identity to the North Crescent, providing contact with nature, beauty through planting and supporting and reciprocating the biodiversity principles of Alfred Place.

6.92 The landscaping proposals are set out in more detail in section 6 of the Design and Access Statement.

6.93 As set out within the Design section above, Policy D1 Design states that development should respect local context and character. Taking into consideration these requirements the Eisenhower Centre is proposed, subject to further discussions with LBC, to be incorporated into the development of the public realm surrounding the site in accordance with the aspirations set out in the FAAP. Enhanced seating, planting and greening, along with pedestrianisation would be included into the future development of the public realm.



- 6.94 Any future public realm development at the site would additionally enhance nature and biodiversity. Policy A3 Biodiversity looks to assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development.
- 6.95 The future provision of public realm improvements associated with this development offer a tangible wider public benefit should they be facilitated and will be in compliance with the principles set out in Local Plan Policy A1 and A2.
- 6.96 In general, the proposals will transform and will seek to facilitate the public realm around the site to one cohesive high quality, connected space which will integrate the buildings with their surroundings, aid orientation and legibility and provide more direct and pleasant routes for people who walk through the area on a daily basis.

#### **Transport/Servicing/Waste Management**

- 6.97 Planning policy at all levels advocates locating new developments in areas which are easily accessible by sustainable travel. The proposed development location achieves a PTAL rating of 6b, which is categorised as 'excellent'. The site is located within proximity of several London Underground stations, rail stations, and local bus services.
- 6.98 Policy T4 of the Camden Local Plan relates to Sustainable Movement of Goods and Materials. This policy states that the Council will look to promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road. Further to this, it is required that goods vehicles are accommodated on site.
- 6.99 Chapter 10 of the London Plan covers Transport. Policy T2 relates to Healthy Streets and ensures that development proposals should demonstrate how the dominance of vehicles will be reduced. Policy T4 *Assessing and Mitigating*

*Transport Impacts* sets out that the cumulative impact of development on the public transport and road network should be taken into consideration.

6.100 London Plan Policy T5 looks at cycling and confirms that cycle parking should be designed and laid out in accordance with the London Cycling Design Standards. Policy T6 relates to car parking and Policy T7 *Delivery and Servicing Plans* outlines that developments should be designed and managed so that deliveries can be received outside of peak hours. Delivery and servicing plans are to demonstrate how the requirements of the site are met.

6.101 As required a Transport Assessment, a Delivery and Servicing Plan, and a Framework Travel Plan (prepare by Momentum Transport Consultancy) accompanies the application.

#### ***Car Parking***

6.102 The proposed development is car-free, in line with London Plan policy. There are three existing Blue Badge spaces on Chenies Street which could be available to eligible users of the site. It is anticipated that the majority of trips would be made to the site via public transport. As the proposals seek to provide a car free development there will be no impact on the surrounding highway network in respect of vehicles.

6.103 In line with Camden Local Plan Policies T2 and T4 the development will utilise sustainable transport, including access to public transport and inclusion of cycle storage facilities.

#### ***Cycle Parking***

6.104 It is confirmed within the accompanying Transport Statement (prepared by Momentum) that the proposals contribute to Healthy Street given the provision of 141 long stay cycle parking for staff and 14 short stay spaces for visitors, in accordance with the adopted London Plan and local guidance. 15 showers and 141 lockers are proposed to be provided as supporting cycling facilities.

***Access***

- 6.105 The primary pedestrian access for the site is via North Crescent to the south, a small one-way street connecting Chenies Street at both ends. Pedestrian access will also be possible via Alfred Mews to the rear for the back of house facilities and cycle parking, though this will very much be a secondary access point.
- 6.106 The proposed development includes the pedestrianisation of North Crescent to facilitate a significant public realm enhancement, which will support both TfL's Healthy Streets Approach and the West End Project's Alfred Place designs. These proposals would provide a high-quality access for users of and visitors to the site, as well as a new small public space for pedestrians not using the site.

***Delivery, Servicing and Waste***

- 6.107 In accordance with Camden's Transport CPG (2021) the Applicant has prepared a Delivery and Servicing Management Plan. A summary of the proposed delivery, servicing and waste strategy is provided below. Deliveries and servicing would increase by three daily trips and there will be no additional servicing trips in the peak hour as a result of the increased floorspaces.
- 6.108 Deliveries and servicing associated with the proposed development would be continued through on-street loading on Alfred Mews to access the back of house facilities. The largest vehicles would reverse from Tottenham Court Road to access the loading area, then egress in forward gear to return to Tottenham Court Road and the surrounding highway network. Vehicles smaller than an 8m rigid would drive in and turn around at the end of Alfred Mews, accessing and egressing in a forward gear as other vehicles of this size currently do already.

- 6.109 Waste is currently stored on-street to the rear of the development and is collected daily via Alfred Mews. Facilities Management moves the bins to Alfred Mews for loading prior to arrival.
- 6.110 Waste collection is proposed to occur on-street, with waste collection vehicles utilising Alfred Mews.
- 6.111 A Travel Plan has been prepared and accompanies this application. In line with local and London policies, it looks to facilitate sustainable travel to and from the site. The accessibility of the site, the use of sustainable transport modes, the plan to create awareness of the TP, the plan to influence the travel behaviour of occupiers and looking at minimising the developments impact on the environment are all objectives of this plan.

### ***Environmental Considerations***

### ***Sustainability and Energy***

- 6.112 Paragraph 148 of the NPPF notes that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 6.113 At paragraph 154 the NPPF states that in determining planning applications, local planning authorities should expect new development to:
- 1. comply with any development Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*

*2. take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.*

6.114 Policy S12 of the London Plan states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- 1) be lean: use less energy and manage demand during operation
- 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
- 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
- 4) be seen: monitor, verify and report on energy performance.

6.115 In addition, major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

6.116 A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:

- 1) through a cash in lieu contribution to the borough's carbon offset fund, or
- 2) off-site provided that an alternative proposal is identified, and delivery is certain.

6.117 At a local level, Policy CC1 *Climate change Mitigation* of the Camden Local Plan (2017), sets out that developments should reduce carbon dioxide emissions in

line with the energy hierarchy. Sustainable transport options are to be available; resource efficiency should be optimised as well as the promotion of sensitive energy use.

6.118 In accordance with London Plan and Camden policy the development will achieve compliance with Part L requirements. Its carbon savings are achieved through a mix of energy savings measures. It has been confirmed within the Energy Statement that a 41.59% on site improvement on 2013 Building Regulations will be achieved by the part L2a of the development. In accordance with the hierarchy set out in London Plan policy S12, the remaining required will be met through a case in lieu payment.

6.119 Both the refurbished elements the buildings will achieve on site carbon savings of 70.42% and 64.29%. The development in its entirety will achieve substantial carbon and energy savings. In addition, the development has been one of the first in the UK to undergo a NABERS assessment for part refurbishment, part new building which will allow for a detailed and precise monitoring and reporting of the operative energy consumption once the development is occupied.

6.120 In accordance with policy CC1, the design team has carefully considered and implemented a balanced approach throughout design development where 87% of existing structure is retained and 84% of existing primary façades are retained in order to restore the listed building to its original fabric as much as possible and provide future flexible floorplates. The proposed scope of refurbishment, demolition and expansion will collectively contribute to the improved view, energy performance and future maintenance over the course of the building's life cycle.

6.121 The scheme will adopt the following key features to reduce the environmental impact of the demolition and extension part of the project:

- The development will reduce energy consumption by targeting improved U-values, airtightness and low energy lighting specification.

- The development will minimise embodied carbon through efficient design, procurement of materials from a local source, with a high-recycled content and prioritise manufacturers that provide take back schemes.
- The developer will ensure all materials are responsibly sourced and of low environmental impact where feasible.
- The developer will implement a site waste management plan and stringent resource efficiency benchmarks including 80% volume and 90% tonnage of demolition waste diverted from landfill.

6.122 As per recommendations listed in the Energy efficiency and adaptation CPG relevant to Policy CC1, quantification of the environmental impacts of the refurbishment and new build elements has been carried out by Eight Associates during RIBA Stage 2. This included quantification of the structural mass loading. It has been demonstrated that life stages A1-A5 (Construction materials, Transport to site and Construction/ installation processes) are significantly below the GLA benchmarks because a balance is achieved between refurbishment and new build parts of the project. Therefore, it can be concluded that the new construction hasn't contributed hugely to the embodied carbon emissions of the project which is in line with both requirements e) and f) from Policy CC1.

6.123 In line with Camden Local Plan Policy CC3 the development will achieve a water consumption target of 50% efficiency improvement over the BREEAM New Construction 2018 baseline through the implementation of low water-consuming fitting.

6.124 In accordance with the requirements in Policy CC2 Adapting to climate change, a BREEAM pre-assessment has been prepared and the site currently achieves a score of 71.2% equating to an 'Excellent' rating.

### ***Daylight/Sunlight***

- 6.125 Within the NPPF it is set out at Paragraph 123 that local planning authorities take a flexible approach when applying daylight and sunlight guidance to planning applications. It is stated that *“Local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, 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)”*.
- 6.126 Policy D6 of the London Plan, *Housing Quality and Standards*, states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximizing the usability of amenity space.
- 6.127 Avison Young were instructed to advise on daylight/sunlight matters in regard to the proposed development. Within their accompanying Daylight and Sunlight Report the potential effect of the proposed scheme has been considered in regard to the neighbouring residential properties.
- 6.128 As set out in the report, overall, the results of the daylight and sunlight analysis indicate that the majority of windows and rooms tested within the neighbouring properties will satisfy the recommended BRE Guidelines values for sky visibility (VSC) and daylight distribution (NSL). In addition, many of those below that fall below the recommended BRE values either represent minor deviations; relate to less sensitive bedroom or non-habitable/secondary spaces (including ‘non-habitable’ small galley kitchens of less than 13 sq m); or arise due to the inherent design constraints of the buildings concerned.
- 6.129 Whilst there will be some isolated windows in Mayne House which will experience some perceptible alterations in daylight and sunlight amenity, the losses are in the majority of cases minor in nature and only affecting bedrooms



which are considered less sensitive rooms. The main living spaces in these properties will remain wholly unaffected.

- 6.130 The daylight and sunlight impact to No.9 Chenies Street is also limited. Where there are isolated impacts that fall below the baseline BRE target criteria, they are minor in nature in Avison Youngs opinion, with the majority of windows and rooms meeting the BRE's target criteria.

### **Basement**

- 6.131 London Plan policy D10 states that *“boroughs should establish policies in their Development Plans to address the negative impacts of large-scale basement development beneath existing buildings, where this is identified as an issue locally. “*

- 6.132 *Policy A5 in the Local Plan outlines that the Council will only permit basement development “where it is demonstrated to its satisfaction that the proposal would not cause harm to:*

- a. neighbouring properties.*
- b. the structural, ground, or water conditions of the area.*
- c. the character and amenity of the area.*
- d. the architectural character of the building; and*
- e. the significance of heritage assets.*

*In determining proposals for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.*

*The siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property. Basement development should:*

- f. not comprise of more than one storey;*

- g. not be built under an existing basement;*
- h. not exceed 50% of each garden within the property;*
- i. be less than 1.5 times the footprint of the host building in area;*
- j. extends into the garden no further than 50% of the depth of the host building measured from the principal rear elevation.*
- k. not extend into or underneath the garden further than 50% of the depth of the garden;*
- l. be set back from neighbouring property boundaries where it extends beyond the footprint of the host building; and*
- m. avoid the loss of garden space or trees of townscape or amenity value.*

6.133 It is proposed to deepen the existing basement to the rear of Telephone Exchange, by approximately 2.8m, and extend the basement footprint below the existing garage and east end of the central lightwell. The principle of the proposed basement in this location is acceptable and in accordance with Policy A5 as it *does not* comprise of more than one storey; *is not* built under an existing basement; *does not* exceed 50% of each garden within the property; *is not* less than 1.5 times the footprint of the host building in area *nor does* it extend into or underneath a garden further than 50% of the depth of the garden.

6.134 GMA has been undertaken by CGL as part of a Basement Impact Assessment, which is provided within the Appendix of the HTS Planning report. The model captures the overall historical and proposed construction sequence extending from the existing conditions across the footprint to the phased proposals forming the scheme. The report notes that the construction of the proposed basement is likely to have a negligible impact on the groundwater regime in the vicinity of the site. It is also not anticipated to affect the surface water flow.

6.135 The basement construction is not anticipated to affect surface water flow or flooding. Building Impact Assessment has been undertaken for the 2 No. of neighbouring buildings, Plot A to the north and Plot B to the south. An

assessment of the results of the detailed ground movement analysis and displacement profiles of the above indicate that, with good construction control and high level of workmanship, these movements can be restricted to between damage category 0 and 1 which indicate negligible to very slight damage.

6.136 The impact of the proposed development on the highway is considered to be within acceptable limits and of low risk. In summary, based on this assessment, the risk of impact of the proposed works on the identified critical constraints is considered to be low, and within acceptable limits.

## 7. PLANNING BENEFITS

- 7.1 The proposed development has been carefully and sensitively developed over an iterative design process. For clarity, key aspects of this approach are summarised below and should be given full and significant weight.
- 7.2 The result of this iterative and considered approach is the delivery of an exemplar and well-designed scheme that will deliver the following substantial public benefits that form material considerations of the planning application that should be afforded full weight in the determination of the application.

### *Employment and Skills*

- 7.3 The proposed development will **deliver additional office use in line with the core objectives of the CAZ** and the London Borough of Camden's policies, in particular Policy G1 which sets out Camden's requirements and seeks the provision of 695,000sqm of office floorspace up 2031.
- 7.4 The proposed development will contribute to securing greater provision of office space suitable for SMEs, aid in meeting Camden's requirement for affordable workspace, and is **proposing 10% of the uplift in floorspace** as affordable at a discount of market rent.
- 7.5 There will be a number of beneficial economic impacts as follows:
- The construction phase would support a total of **£541,000 of spending** in the local area
  - Once operational, the proposed development would support **459 jobs – a 33% uplift relative to the existing site.**
  - Workers at the end use development would **spend £995,000 per annum.**

- **£17 million in additional annual** GVA as well as additional circa **£695,000** in business rate payments.
- 7.6 There will be **employment opportunities for local residents** targeting hard to reach priority groups.
- 7.7 The Applicant will use reasonable endeavours to ensure **that 20% of construction jobs go to LBC residents, equating to 65 job years.**
- 7.8 The Applicant will also seek to **maximise employment opportunities for LBC’s resident population at the end-use stage of development.** The Applicant will use reasonable endeavours to broker a meeting between the end-use occupier and the Council’s Economic Development Service. The Applicant will encourage the end-use occupier, in liaison with Camden’s Economic Development Service, to promote opportunities for local LBC residents and advertise through Camden Job Centres and other local employment vehicles.
- 7.9 The Applicant will also **encourage end-use occupiers to target hard-to-reach priority groups,** agreed with the council, suffering disproportionately from unemployment or low skills when seeking to fill vacancies arising at the proposed development, where it is legally possible to do so. The Applicant is also contributing towards this through the Stanhope Foundation.
- 7.10 All full-time **operational staff directly** employed by the Applicant will be **paid the London Living Wage** and the London Living Wage will be promoted for all construction and operational employees that are not directly employed by the Applicant but are working at the site.

#### ***Design and Public Realm***

- 7.11 The development aims to **preserve and enhance the character** of the application site and the surrounding area, respecting the unique character

of Camden and **enhancing the historic environment of Minerva House**, which is afforded a statutory Grade II listing.

- 7.12 The proposed development will give Minerva House and Telephone Exchange a future that **will sustain their heritage significance** for the long Term,
- 7.13 The proposed alterations will be of **outstanding architectural quality** and design, developed by an award-winning architectural practice and it is envisaged that these proposals will see a benchmark for future development within the area.
- 7.14 It is anticipated that **80 – 87% of the existing fabric of the Crescent and Mews will be retained**. Furthermore, both buildings that comprise the application site are designed to be **fully accessible**.
- 7.15 The proposed development will seek to create areas of **significant public realm** in and around the site. Moreover, **substantial greening** is proposed through landscaping and green roofs to contribute to biodiversity enhancement, sustainability, wellbeing and the Mayor’s ambition for greener urban environments.

### ***Sustainability***

- 7.16 This development seeks to achieve **BREEAM “Excellent”** and undergoing a **NABERS assessment for part refurbishment**, part new building which will allow for a **detailed and precise monitoring and reporting** of the operative energy consumption once the development is occupied.
- 7.17 The proposals **retain as much of the building as possible** and by doing so enables a number of tangible environmental benefits. By reducing the use of new materials, and their impacts and CO2 emissions connected to their

production, while the embodied energy of the existing material is preserved and not wasted.

- 7.18 **A 41.59% on site improvement on 2013 Building Regulations will** be achieved by the part L2a of the development. In accordance with the hierarchy set out in London Plan policy S12, the remaining required will be met through a case in lieu payment.
- 7.19 Both the refurbished elements the buildings **will achieve on site carbon savings of 70.42% and 64.29%.**
- 7.20 Materials will be chosen that have a minimal environmental impact, are **from sustainable or recycled sources** and, where feasible, are locally sourced to reduce transportation impacts.
- 7.21 The proposals will **allow for openable windows to enhance future occupant's wellbeing.** Furthermore, the provision of a new electrical supply for the site will meet new office user demands. An Electric air source heat pump heating system utilising low carbon grid supplies in lieu of gas burning system.

### ***Transport***

- 7.22 The development **is in a highly accessible location** and has been designed to prioritise **active travel with substantial cycle parking and high-quality end-of-trip facilities** to encourage commuting by bicycle and cycle use by visitors.

## 8. PLANNING OBLIGATIONS & SECTION 106

- 8.1 It is envisaged that discussions relating to the following potential conditions or heads of terms for a Section 106 Agreement will continue with LBC during the determination of the planning application.
- 8.2 It is envisaged that the following planning obligations will be necessary to make the development acceptable in planning terms, subject to discussion with the Local Planning Authority:

### Transportation

- Delivery and Servicing Management Plan and servicing vehicle monitoring
- Considerate Constructors Scheme
- Travel Plan
- Provision of highway improvements, Section 278, Section 38

### Sustainability

- Obligations regarding delivery of energy/sustainability strategy and any associated carbon reduction mitigation measures

### Employment/Residential

- Affordable workspace
- Employment & Skills (Construction)
- Employment & Skills (Operation)
- Housing

### Other

- Public Realm



## 9. CONCLUSIONS

9.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the development Plan unless other material considerations indicate otherwise.

9.2 This planning statement has been prepared by DP9 Ltd on behalf of Schroders UK Real Estate Fund in support on an application for the:

*“Refurbishment and reconfiguration of the existing buildings; including a one storey extension, plus plant, minor demolition works associated with internal and external alterations to provide additional office accommodation and associated works.”*

9.3 The proposed development has been developed following on from extensive engagement with the Local Authority prior to submission.

9.4 The proposed development accords with the NPPF and represents sustainable development which accords with the development Plan. The design process for the scheme has taken into account the full range of stakeholder views.

9.5 This planning statement assesses the development against the development Plan and other relevant national, regional and local planning policy, including the aspirations established in the Local Plan and the London Plan. It is considered that the principle of the development accords with current and emerging planning policy and guidance.

9.6 The proposed development would provide a significant uplift of economic activity, with the office space expected to accommodate an uplift of 33% relative to the existing site.

9.7 The impacts of the development have been fully assessed by the supporting application documents and mitigation measures have been identified where

necessary. The development is considered to be entirely appropriate for the site, and the area.

- 9.8 The development proposals are considered to accord with the development Plan, and therefore benefit from the presumption in s38(6) of the 2004 Act. Furthermore, it accords with the policies of the NPPF as a whole and is deemed to be 'sustainable development' in terms of Paragraph 11, and therefore the development should be granted full planning permission.