
Planning Statement

27-28 Windmill Street

1. Introduction

- 1.1. This statement has been produced on behalf of our client to support a planning application for the following development at 27-28 Windmill Street:

Replacement of the front façade, erection of a single storey extension and mansard at roof level following demolition of the existing 4th floor level, reinstatement of a front lightwell, reconfiguration of the entrance, repositioning of plant and creation of roof terrace and three terraces to the rear all in connection with the office use of the building.

- 1.2. The property is occupied by offices and its lawful use is Use Class E (office use). The proposals seek the refurbishment of the existing office building of approximately 779.3sqm and the provision of an extension comprising 139.1sqm. The general thrust and intent of local and regional policy seeks to protect office floorspace in sustainable locations. The proposals ensure the longevity of an existing office and employment generating use in this sustainable and accessible location through enhancing its current provision.
- 1.3. The proposals will also provide an enhancement to the contribution that the site makes to the character and appearance of the conservation area, providing a more contextual front elevation through improved facing materials, and detailed design.
- 1.4. The statement finds that the development proposals represent sustainable development in the context of the National Planning Policy Framework (NPPF) and the 'Development Plan,' securing the following planning benefits:
- Optimising and making effective use of brownfield land through the increase in quantum and quality of workspace in a highly sustainable and well connected location;
 - Attracting existing and new workers to the area that will support local businesses; and
 - Enhancing the character and appearance of the site and surroundings by introducing a new facade of high quality design and architectural merit.

1.5. This statement provides background information relating to the site, provides details of the proposal and addresses the key planning and heritage considerations. This statement has been set out under the following headings:

- Section 2 – Site and surroundings
- Section 3 – Planning history;
- Section 3 – Proposal;
- Section 4 – Planning policy framework;
- Section 5 – Planning considerations;
- Section 6 – Conclusions

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

- Existing, demolition and proposed drawings prepared by MWA Architects
- Design and Access Statement prepared by MWA Architects
- Energy Strategy prepared by Webb Yates Engineers
- Highway Note prepared by Mayer Brown Ltd
- Drainage Note prepared by Expedition
- Noise Impact Assessment prepared by KP Acoustics Ltd
- Daylight and Sunlight Report prepared by Rights of Light Consulting
- Heritage Statement prepared by Bidwells
- Draft Construction Management Plan Pro-forma prepared by Mayer Brown Ltd.
- Building Services Report prepared by Webb Yates.

2. Site and Surroundings

Site Location

- 2.1. The site is located within the London Borough of Camden and specifically within the Bloomsbury ward. The property is located on the north-western side of Windmill Street which runs south-west from Charlotte Street to Tottenham Court Road north-east of the site.



Site Location Plan

Site Description

- 2.2. The property is a four storey building above ground floor and basement. The building was constructed in the 1990's. The facade features red brick, horizontal windows and stone banding. The hierarchy of the building, the stone banding and windows do not relate to the neighbouring existing buildings.



Photographs of the application site

Site Designations

- 2.3. The property is not statutory listed but is located within the Charlotte Street Conservation Area. The Conservation Area Appraisal adopted in 2008 states the following in relation to Windmill Street –
- “named after the windmill that once stood at its western end, comprises predominantly four storey townhouses with ground floor shopfronts. None of the former railings to frontages remain. The predominant materials are yellow brick with red brick and stucco decoration. The more decorative facades of the public houses at either end differ. The north side of the street has been much redeveloped, with some re-creation of the Georgian pattern”.*
- 2.4. The property is not listed as a positive contributor to the conservation area within the appraisal.
- 2.5. The site is further designated within the Central London Area, CMP Priority Area and Cross Rail Safeguarding Area. In addition, the site is located within the area covered by the Fitzrovia Area Action Plan adopted in March 2014. The site is adjacent to the Grade II listed Rising Sun Public House to the east.
- 2.6. The site has a PTAL rating of 6b which is classed as having excellent accessibility with the highest rating. The site is located within 3 minutes walking distance is Goodge Street station, providing access to the Northern Line. Tottenham Court Road underground station is within a 5 minute walk and opens up connections to the Central Line
- 2.7. According to the Environment Agency’s data, the site falls within Flood Zone 1 and, therefore, has a low probability of flooding.

Site Use

- 2.8. The property comprises a self-contained office building arranged over lower ground, ground and four upper floors.

3. Planning History

3.1. A summary of the planning history is set out in the table below.

Ref	Description of Development	Decision	Date
PSX0004086	The installation of a new shopfront & canopy over the main entrance.	Consented	28/01/2000
PS9905077	The installation of a shopfront and canopy over the entrance together with planters and bollards, as shown by drawing number 620/100.	Refused	25/10/1999
PS9904669	Alteration to a previously approved scheme for the redevelopment of the site, comprising a change of use of the ground floor and basement from retail use (Class A1) to office use (Class B1), as shown on drawing numbers P1 and P4.	Granted	06/07/1999
9500049	Extension of (5 year) time limit for planning permission granted on appeal on 30 March 1990 (Reg.No.PL/8900011) for the redevelopment of the site by the erection of a 4 storey and basement building comprising 2 retail shops on the ground floor and B1 offices on the upper floors. (No plans submitted).	Withdrawn	20/02/1996
8900011	Redevelopment of the site by the erection of a 4 storey and basement building comprising 2 retail shops on the ground floor and B1 offices on the upper floors as shown on sheet numbers MHK/5.1 - 5.14 (inclusive).	Appeal granted	30/03/1990
8700027	In Outline development for shops and flats as shown in site plan and letter dated 2nd March 1987..	Granted	06/01/1987

Pre-application Feedback

3.2. A pre-application submission was made in February 2020 under reference 2020/1237/PRE. The initial pre-application proposals demolished the existing building to allow for the installation of a new façade, with an upward extension. The upper floors of the building were to be clad in either black glazed brickwork or the existing brickwork was to be painted black. In terms of height and massing, this scheme brought the fourth floor forward to meet the plane of the front elevation, with the existing parapet level raised and two additional set back floors.

- 3.3. The Council raised that the fourth floor extension would create an “*extra floor in the main frontage, which raises the parapet line and alters the scale of the front elevation. This would result in the proportions of the building being out of balance with adjacent buildings on both sides.* The advice also stated that the proposed black finish to the front elevation was “*lending to the oppressiveness of the building and it is too loud in its materiality when viewed in context*”.
- 3.4. Following the pre-application advice issued in 2020, a new design team was instructed to prepare a revised scheme. A further pre-application (ref: 2021/1089/PRE) was submitted in February 2021 and was considered in a written response dated 4th June 2021. The scheme proposed the forward extension of the existing fourth floor and addition of one additional storey, set back from the front elevation.
- 3.5. This formal submission seeks to respond to the written advice through the following amendments to the scheme:
- The proposals now seek the replacement of the existing set-back fourth floor level to be brought forward to meeting the front building line with a new fifth floor level set back from the front elevation in the form of a mansard roof. In line with the pre-application advice, the proposals ensure that the ridge the proposed roof extension is not higher than the Grade II Listed Rising Sun Public House, and will not be visible from within the wider townscape including views from Tottenham Court Road.
 - The amount of stone proposed to the front elevation has been considerably reduced and stone is now only proposed for the mullion and transom details.
 - The proposals have amended the previously proposed double height arches to be divided by a horizontal fascia band continued from the adjacent shopfronts to the west.
- 3.6. A summary of the responses to the pre-application advice has been set out in the table below.

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Pre-application Advice	Response
Land Use	
The proposal would increase the quantum of office floorspace by 138.6 sq. m (GIA). This would meet the requirements of policy E1 and would be considered acceptable	No response required.
Policy H2 indicates that in Central London Area, where development involves additional floorspace of more than 200 sq. m (GIA), the Council will require 50% of all additional floorspace to be self-contained housing. This new proposal seeks to add an additional 138.6 sq. m of office floorspace to the host building and therefore Policy H2 does not apply and a contribution towards housing provision in the borough is not required.	No response required
Design	
The existing building is of no particular architectural or historic merit. However in terms of height, building line and overall scale, it is generally in keeping with the conservation area.	No response required.
The property makes a neutral value within the Charlotte Street Conservation Area (as per the CAAMS listed buildings and positive contributors map). In particular it pays respect to the side wing of the listed public house on the corner of Tottenham Court Road in terms of its height, eaves height and scale.	It is our view that the building currently detracts from the Charlotte Conservation Area and the proposals subject to this application will provide an enhancement to the streetscape and wider Conservation Area.
In its location the surrounding viewing angles of the upper floors of the building are mostly acute, except from Tottenham Court Road, where the proposed roof extension would be seen behind the Rising Sun pub. Whilst this scheme is less bulky than the previous pre-app proposal, there is still a substantial impact on the roofline and further reduction in high-level bulk would be required. You may like to consider further sloping the upper mansard to reduce visibility or removing the mansard completely.	MWA Architects have revised the design of the roof to ensure it is not visible from Tottenham Court Road. This has been illustrated at pages 5-7 of the supporting Design and Access Statement.
Due to the set back of the proposed roof terrace from the front façade of the building, it is considered that it would not be visible from any public vantage point so would not have a harmful impact on the streetscene or the conservation area. The height and bulk of the external stair that would provide access to the roof terrace is not clear from the floor plans (not to scale) or the section drawings.	<p>The roof terrace is not visible from any public vantage point.</p> <p>The external stair that provides access is illustrated in section drawing EE (ref P2204).</p>

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Providing that demolition is not extensive and is confined to the roof and front elevation of the building, revisiting the existing façade would be considered of benefit. At street level, blind doors, flank windows and doors have been obscured, meaning that the building's frontage is largely inactive.	No response required.
The scheme takes its cues from the neighbouring listed pub and interprets these referenced through arched openings which relate the building to its context. This could be an imaginative approach; however it feels that this has led the proposal to be quite grand within its setting and may require further refinement. The new front façade should line up with the existing front building line and should not be set forward of this.	The amount of glazing and stone at ground and first floor level has been revisited and reduced. The proposal now mediates between the fascia of the rising sun and the shopfronts evident along Windmill Street.
The proposal would include the installation of arched double height ground and first floor. The ground floor expression appears overly grand and inflated in relation to the overall scale of the building. Its fascia band should line through with the neighbouring shopfronts to retain a more consistent scale rather than referencing the pub	The proposals have amended the previously proposed double height arches to be divided by a horizontal fascia band continued from the adjacent shopfronts to the west.
The proposal includes facing material of brick and stone to try to match the materiality and tones of the neighbouring properties. The large expanse of modern stonework, in conjunction with a high proportion of glazing, particularly at ground floor level poses a greater risk to the streetscape. The ground floor treatment should take a different tone in order to ensure that it is expressed as a distinct element from the upper floors.	The amount of stone proposed to the front elevation has been considerably reduced and stone is now only proposed for the mullion and transom details.
Neighbouring Amenity	
A daylight and sunlight assessment would have to be submitted to demonstrate that the proposal would not have an adverse impact on the amenity of neighbouring occupiers by negatively impacting on the existing levels of daylight and sunlight that they enjoy	A daylight and sunlight assessment prepared by Rights of Light Consulting has been submitted to support application.
An assessment would also have to be made on the impact on the amenity of neighbouring occupiers in terms of any loss of outlook or sense of enclosure as a result of the proposed extensions to the existing building. The rear part of the building is approximately 8m from the rear elevation of no. 2-4 Whitfield Street and 7m from the rear elevation of no. 47 Tottenham Court Road. If the windows on the rear elevation of these properties serve habitable rooms, the proposal could have a harmful impact on the outlook from these windows.	Please see paragraphs 6.36 - 6.40 of section 6 below for further details on the assessment on neighbouring residential amenity.

<p>The installation of privacy screens may exacerbate the concerns about daylight and outlook and would not be encouraged as a mitigation measure.</p> <p>If office workers were to use the roof terrace in the evenings, there may also be an issue with noise and disturbance to local residents particularly where it would be considered to be quieter in the evenings at the rear of the site. This element of the scheme would not be supported and should be removed from any future planning application</p>	<p>Please see paragraphs 6.36 – 6.40 of section 6 below for further details on the assessment on neighbouring residential amenity.</p>
Lightwell	
<p>Although the proposed lightwell is within a private forecourt, lightwells and railings are unacceptable as the frontage area has been enjoyed by the public as a right of way for over 20 years (since 1960s).</p> <p>The installation of grilles to cover the lightwell would not be supported as they are a trip hazard. In addition, they are unsightly and end up becoming clogged up with dirt and detritus, thereby having a negative impact on the streetscape. Pavement lights (precast concrete slabs with glass blocks) may be considered acceptable.</p>	<p>The proposed lightwell will leave a remaining unobstructed footway width of 2,014mm. Mayer Brown have outlined that this is well in excess of the absolute minimum and minimum acceptable thresholds. The supporting note by Mayer Brown states that the proposals are fully in line with TfL guidance on footway clear zones.</p> <p>The lightwell will provide natural light and natural ventilation to the lower ground floor - this is critical to the quality of accommodation provided to future users of this level.</p>
Transport	
<p>Policy T2 of the Camden Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. This includes limiting the availability of both off-street and on-street parking. The proposal would not include the provision of car-parking, in accordance with Policy T2</p>	<p>The development will be car free.</p>
<p>2 long stay cycle spaces (1 space per 90 sq. m) and 1 short stay cycle parking space would be required to be provided in accordance with policy T1, the cycle facilities section of CPG Transport and the new (Intend to Publish) London Plan. These parking spaces should be located at ground floor level (within a secure cycle storage area within the building) where they would be easily accessible. Any future proposal should include details of the existing and proposed cycle storage area and a detailed plan with dimensions and types of racks would be required.</p>	<p>Long stay cycle spaces will be provided in accordance with Policy T1 of the London Plan.</p>
Energy	

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No details of energy or sustainability measures have been provided as part of the pre-application document. Retrofitting the building with more energy efficient measures to minimise energy consumption (draft proofing, thermally efficient windows and insulation) should be considered as part of any refurbishment works	The application is supported by a Energy Strategy prepared by Webb Yates.
Any development that is likely to be at risk of overheating (for example due to large expanses of south or south west facing glazing) will be required to complete dynamic thermal modelling to demonstrate that any risk of overheating has been mitigated. Active cooling (air-conditioning) will only be permitted where dynamic thermal modelling demonstrates there is a clear need for it after all of the preferred measures are incorporated in line with the cooling hierarchy.	Dynamic thermal modelling has been undertaken and submitted to support the application.

4. Proposals

- 4.1. The proposals seek the following development:

Replacement of the front façade, erection of a single storey extension and mansard at roof level following demolition of the existing 4th floor level, reinstatement of a front lightwell, reconfiguration of the entrance, repositioning of plant and creation of roof terrace and three terraces to the rear all in connection with the office use of the building.

Proposed Façade

- 4.2. The proposals seek to replacement the existing 1990s façade which is out of keeping with the historic character of the area in terms of materials and detailed design with a new façade which will enhance the appearance of the streetscape.
- 4.3. The design of the elevation takes cues from the neighbouring Grade II listed building and is split into two to reference the original plan form of two townhouses. The proposals respond to the bays and architectural details of the Rising Sun Public House.
- 4.4. The proposed front elevation would remove the existing projecting central bay which protrudes by 400m beyond the main façade above first floor level, and reinstate a flat front elevation, consistent with the neighbouring buildings along Windmill Street.

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Existing front elevation



Proposed front elevation

Lightwell

- 4.5. The proposal seeks to reintroduce lightwells to the basement that were infilled in circa 1960. The proposed lightwell will be open with surrounding metal railings to provide protection at ground floor level.

Roof Extension

- 4.6. The proposals seek to add additional office accommodation through the replacement of the existing set-back fourth floor level to be brought forward to meet the front building line, with a new fifth floor level set back from the front elevation in the form of a mansard roof.

Roof Terrace

- 4.7. The proposals seek to create a roof terrace at fifth floor level which will be secured by glass balustrading accessed by tenants on fourth and fifth floor level. In addition, new rear terraces are proposed on the third, fourth and fifth floors to provide amenities for the tenants on those floors.

Highways

- 4.8. The long stay cycle parking is proposed to be located in the basement within one of the existing pavement vaults. The proposals provide storage for 3 long stay bicycles - one space in excess of what is required for the new build area.
- 4.9. Due to the size of the development and the lack of external amenity space at ground floor, it is proposed that a payment in made in lieu of providing a short stay cycle parking spaces.

Plant

- 4.10. The condensers and air handling units are located on the flat roof to provide fresh air and heating and cooling throughout the building. The units will be located within a louvred enclosure. An 1100mm balustrade around the perimeter of the flat roof will also protect anyone from falling while maintaining the automatic opening vent above the stair, to control smoke in the event of a fire or the roof itself.

5. Planning policy framework

- 5.1. This section outlines the relevant national and local planning policies against which the proposals are considered.

Policy Framework

- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan for an area, unless any material considerations indicate otherwise. In this case the development plan comprises:

- The London Plan (2021)
- Camden Local Plan (2017)

The London Plan (2021)

- 5.3. The new London Plan was adopted in March 2021 and is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London.

Camden Local Plan (2017)

- 5.4. The Camden Local Plan was adopted in July 2017 and sets out the Council's planning policies to deliver the strategic vision for the borough. The most relevant policies in this document are outlined as follows:

Policy G1 – Delivering Good Growth – States that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by: a. supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site. The Policy states that this Plan seeks to meet Camden's objectively assessed needs to 2031 for 695,000sqm of office floorspace (see Policy E1 Economic development).

Policy D1 Design - Seeks to ensure high quality design in development which respects local context and character, preserves or enhances the historic environment and comprises details and materials that are of high quality complementing the local character.

Policy D2 Heritage - States that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Policy A1 - Managing the impact of development - States that the Council will seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity.

Policy C6 Access for all The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. We will: a. expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.

Policy E1 Economic development The Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. The policy states that the Council will support proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites.

Policy E2 Employment premises and sites – States that the Council will encourage the provision of employment premises and sites in the borough.

Policy A4 Noise and vibration – States that the Council will seek to ensure that noise and vibration is controlled and managed and development should have regard to Camden's Noise and Vibration Thresholds/

Policy CC1 Climate change mitigation – states that the Council require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The Council will promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy; and require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met. The Policy states it will support and encourage sensitive energy efficiency improvements to existing buildings.

Policy CC2 Adapting to climate change – States that the Council will require development to be resilient to climate change. All development should adopt appropriate climate change adaptation measures such as the need to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

Policy CC3 Water and flooding – States that the Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible.

Policy CC5 Waste – States that the Council will make sure that developments include facilities for the storage and collection of waste and recycling.

T1 Prioritising walking, cycling and public transport - States that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough

Policy T2 Parking and car-free development – States that the Council will limit the availability of parking and require all new developments in the borough to be car-free

Other Material Considerations

National Planning Policy Framework (2021)

- 5.5. The National Planning Policy Framework (NPPF) does not form part of the development plan, but is an important material consideration and sets out the Government's planning policies. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and is a material consideration in determining planning applications. The NPPF maintains the presumption in favour of sustainable development (paragraph 11) which is defined in paragraph 8 as incorporating the economic, social and environmental elements.
- 5.6. In addition to the adopted development plan, the following documents are relevant material considerations in the determination of this application:
- Charlotte Conservation Area Appraisal (2008)
 - Fitzrovia Area Action Plan (2014)
 - Access for all CPG (2019)
 - Amenity CPG (2021)
 - Design CPG (2021)
 - Developer contributions (2019)
 - Employment sites and business premises CPG (2021)
 - Energy efficiency and adaption CPG (2021)
 - Transport CPG (2021)
- 5.7. These documents will be referenced where appropriate throughout this document.

6. Planning considerations

6.1. This section of the Planning Statement, assesses the proposals against the Development Plan Policies.

The main issues to be considered are:

- Land Use
- Design
- Impact of the proposals on the adjacent Listed Building and Conservation Area
- Residential Amenity
- Highways
- Energy and Sustainability
- Drainage
- Noise

Land Use

6.2. The general thrust and intent of local and regional policy seeks to protect office floorspace in sustainable locations. Strategic Policy G1 of the Camden Local Plan states that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site. The Policy states that this Plan seeks to meet Camden's objectively assessed needs to 2031 for 695,000sqm of office floorspace.

6.3. Policy E1 of the Local Plan states that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. The policy states that the Council will support proposals for the intensification of employment sites.

6.4. The property is occupied by offices and its lawful use is Use Class E (office use). The proposals seek the refurbishment of the existing office building of approximately 779.3sqm and the provision of an extension comprising 139.1sqm.

- 6.5. The principle of additional office floorspace at the site is considered to be acceptable in line with policy E1. This was confirmed at pre-application stage as the advice confirmed that the *“principle of the erection of a new extension to provide new office floorspace suitable for SMEs and local businesses in this central London location is likely to be considered acceptable in land use terms. This would meet the requirements of policy E1 and would be considered acceptable”*.
- 6.6. In addition the pre-application advice confirmed that Policy H2 would not be applicable to the proposals as the additional floorspace is lower than the trigger point for the provision of self-contained housing at 200sqm. The advice confirmed that Policy H2 does not apply and a contribution towards housing provision in the borough is not required.
- 6.7. The proposals will secure the following planning benefits:
- Optimising and making effective use of brownfield land through the increase in quantum and quality of workspace in a highly sustainable and well connected location;
 - Attracting existing and new workers to the area that will support local businesses;
 - Enhancing the character and appearance of the site and surroundings by introducing a facade of high quality design and architectural merit;
 - Boosting the economy through local construction jobs.
- 6.8. The proposals ensure the longevity of an office and employment generating use in this sustainable and accessible location. The proposal both maintains a core business use, and enhances its provision at the site's highly sustainable and accessible location. Accordingly, the principle of development at the site is considered acceptable in line with local plan policies G1, E1 and E2.

Design

- 6.9. Policy D1 of the Local Plan seeks to secure high quality design by making sure all development respects local context and character. The policy states that the Council will require that development:
- *Respects local context and character;*
 - *Preserves or enhances the historic environment and heritage assets;*
 - *Comprises details and materials that are of high quality and complement local character; and*

- *Contributes positively to the street frontage.*

6.10. The Local Plan states ‘*good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings*’.

6.11. The existing building on site was erected in the 1990s under application PL/8900011/N13/20/G. It was built to the designs of Macintosh Haines and Kennedy Partners and is a four storey structure with basement below and a set-back mansard storey above. The pre-application advice stated that the existing building is of no particular architectural or historic merit, however in terms of height, building line and overall scale, it is generally in keeping with the conservation area.

6.12. The proposals have been designed following a detailed analysis of the site’s context and the character of the wider area, as detailed within the supporting Architectural Design Statement prepared by MWA Architects.

Roof Extension

6.13. The proposals seek to add additional office accommodation through the replacement of the existing set-back fourth floor level to be brought forward to meeting the front building line with a new fifth floor level set back from the front elevation in the form of a mansard roof.

6.14. The extended fourth floor will continue the eaves height of the neighbouring building to the west, with the paired arched gables extending upwards as illustrated in the elevation drawings below taken from the submitted Design and Access Statement.

6.15. Following the pre-application advice issued in June 2021, the proposals ensure that the ridge the proposed roof extension is not higher than the Grade II Listed Rising Sun Public House, and is also not visible from within the wider townscape. The mansard roof design has been amended by reducing the pitch which further pushes back the top of the roof at fifth floor level which ensures it will not be visible in views from Tottenham Court Road.

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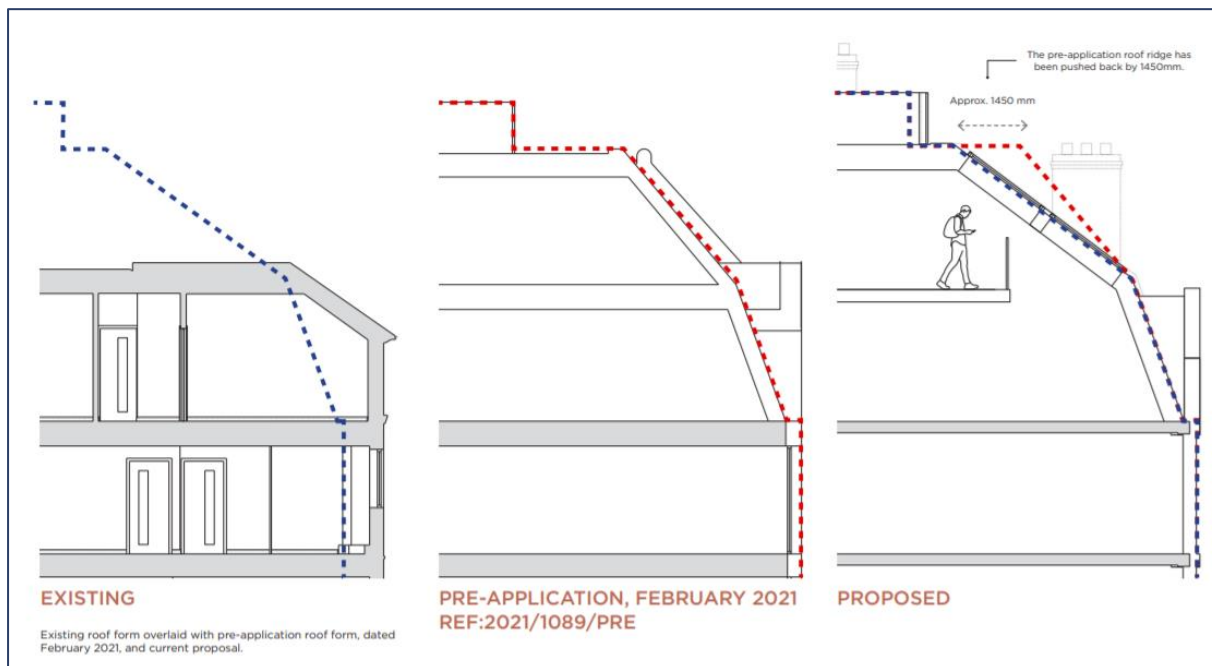


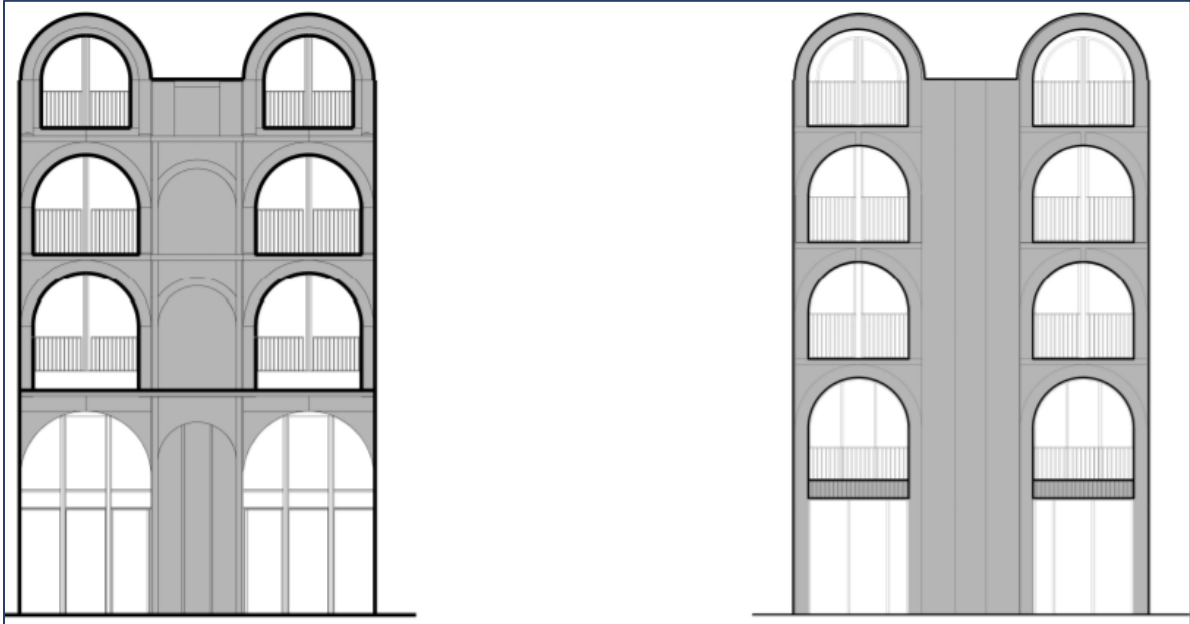
Illustration of altered roof design through the pre-application process



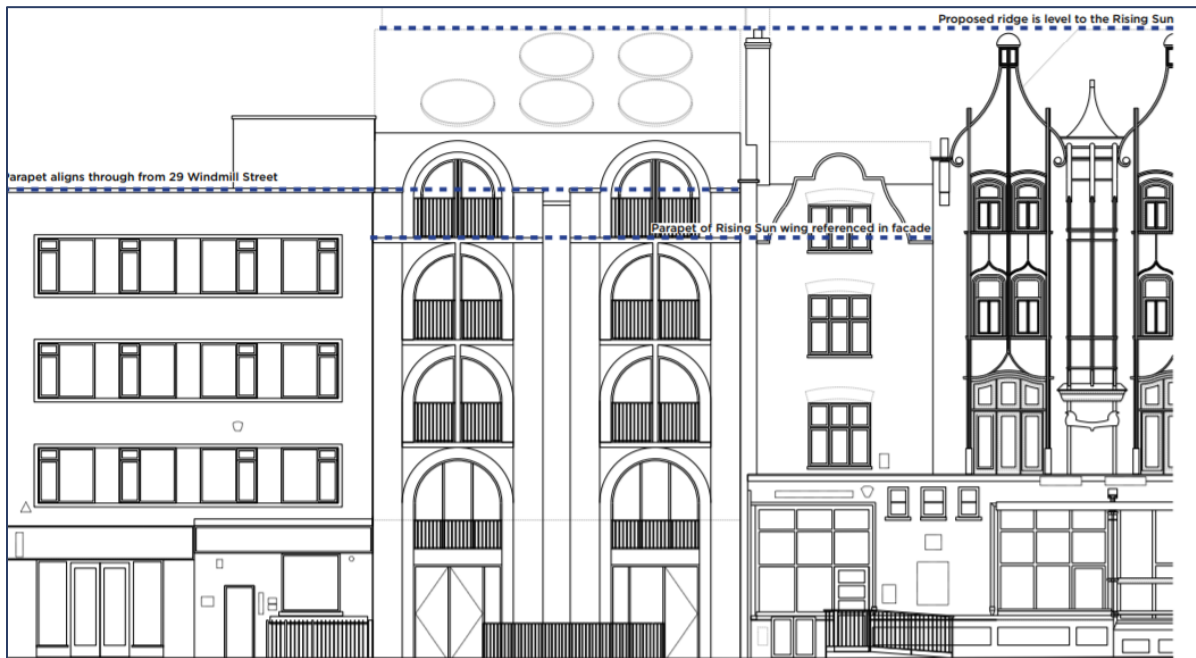
Comparison view of pre-application proposals and application scheme

Façade

- 6.16. The proposals seek to replacement the existing 1990s façade which is out of keeping with the historic character of the area in terms of materials and detailed design with a new façade which will enhance the appearance of the street scape. The proposed front elevation would remove the existing projecting central bay which protrudes by 400m beyond the main façade above first floor level, and reinstate a flat front elevation, consistent with the neighbouring buildings along Windmill Street.
- 6.17. The design of the new façade has been born out of a detailed analysis of the site and surrounding context, incorporating elements from the typologies. The development of the design of the façade has been illustrated at pages 59-65 of the supporting Design and Access Statement.
- 6.18. The design of the elevation takes cues from the neighbouring Grade II listed building and is split into two to reference the original plan form of two townhouses. The proposals respond to the bays and architectural details of the Rising Sun Public House. In response to the pre-application advice, the proposals have amended the previously proposed double height arches to be divided by a horizontal fascia band continued from the adjacent shopfronts to the west.



Pre-application (ref 2021/1089/PRE) (left) and new proposals (right)



Proposed elevation drawing illustrating alignment of the parapet and ridge line with neighbouring buildings.

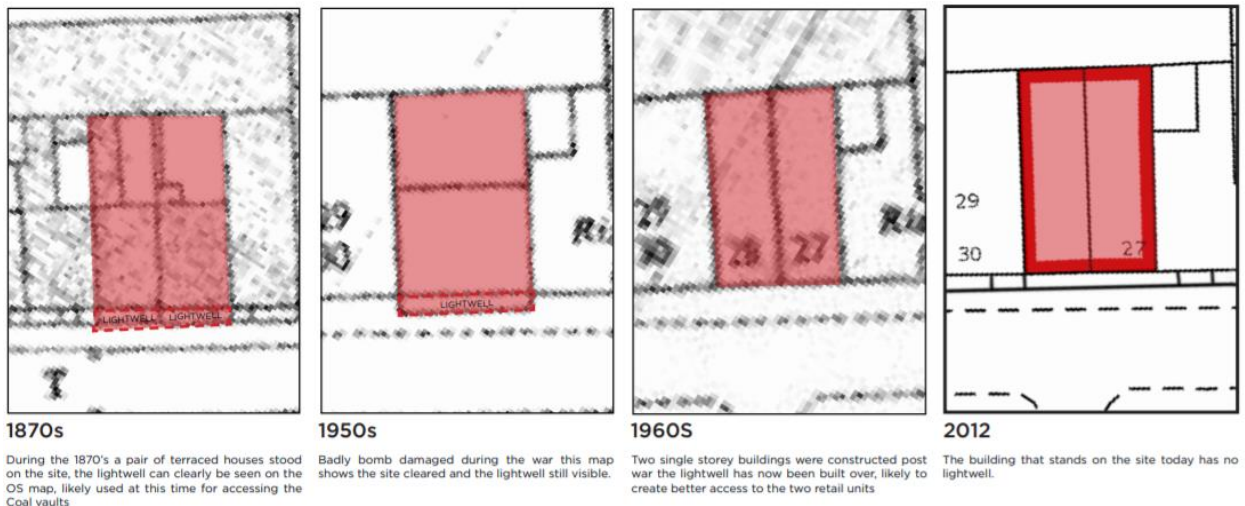
Materials

- 6.19. The proposals seek to replace the existing façade with brick which is the prevalent material of the conservation area. The design proposes cream metalwork to replace bronze metalwork, and the roof extension will be finished in slate.

Lightwell

- 6.20. The proposal seeks to reintroduce lightwells to the basement that were infilled in circa 1960. The proposed lightwell will be open with surrounding metal railings to provide protection at ground floor level. The lightwell will not extend across the full width of the plot which will allow a space for pedestrians to pass or stop if required. Lightwells are a common feature along Windmill Street and all of the buildings on the northern side of the street have external features of the basement at ground floor level.
- 6.21. The Charlotte Street Conservation Area Appraisal (2008) states that “*there is a notable character created by the consistent use of cast iron railings along frontages to separate the pavement from the basement lightwell*”.

- 6.22. The supporting Heritage Statement prepared by Bidwells states that “*historic maps show the surrounding streets were generally developed with terraced houses with front lightwells by the nineteenth century. The site is shown to have had a front lightwell in the 1870s OS map, and again in the 1950s OS map. Where lightwells remain within the conservation area, they provide evidence of the historic development of the area and the typical layout of the plots and dwellings and make a positive contribution to the character and appearance*”.
- 6.23. Further justification for the reinstatement of the lightwell from a highways perspective has been provided at paragraphs 6.40 – 6.42 of the planning statement below



Historic Maps illustrating the lightwell in the 1870s OS Map

Accessibility

- 6.24. The proposal involves a refurbishment of an existing building and seek to meet the requirements of Part M of the Building Regulations. The new entrance doors will be accessible to all, an accessible WC will be provided at ground floor level and the internal lift will serve all levels above ground floor of the building.

Summary

- 6.25. As outlined above, the proposals will provide an enhancement to the contribution that the site makes to the character and appearance of the conservation area, providing a more contextual front elevation through improved facing materials, and detailed design in line with local policies D1 and D2.

Impact of the proposals on the adjacent Listed Building and Conservation Area

- 6.26. Policy D2 of the Local Plan states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. With regard to Conservation Areas, the policy requires all development to preserve or, where possible, enhance the character and appearance of the area and resists development that would cause harm. The supporting text to the policy makes clear that reference should be made to the associated character appraisals.
- 6.27. The application is supported by a Heritage Statement prepared by Bidwells which assesses the impact of the proposals on the adjacent listed building and wider conservation area in detail.
- 6.28. The Heritage Statement concludes that the *"proposals would provide an enhancement to the contribution the site makes to the character and appearance of the conservation area, providing a more contextual front elevation due to improved facing materials, bay rhythms and detailed design"*. The statement outlines that it is considered that the *"proposals would have a beneficial impact on the setting of the listed building, conserving its significance"*.
- 6.29. The proposals are therefore considered to be in accordance with Local Plan Policy D2.

Residential Amenity

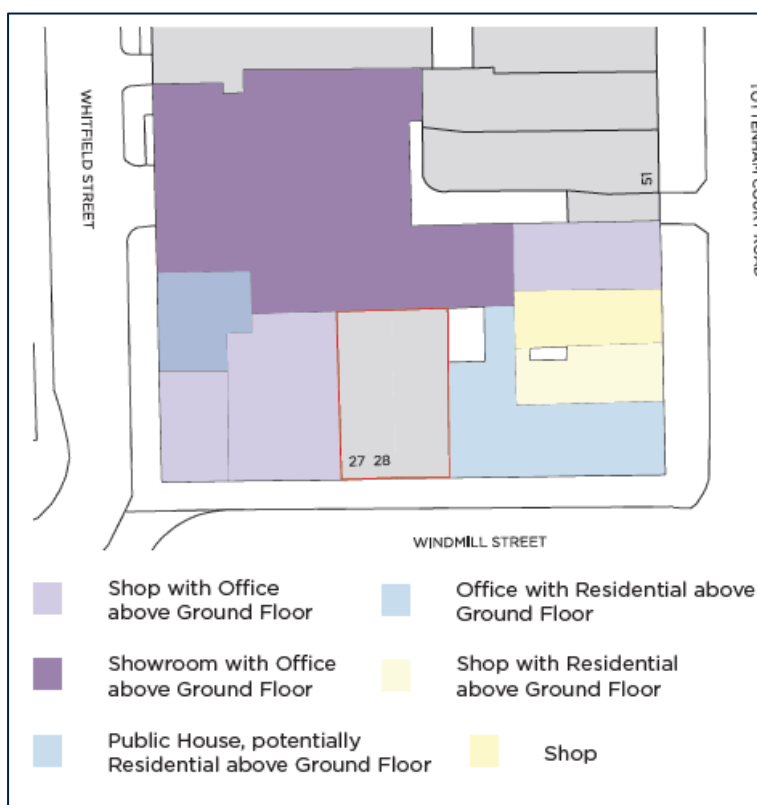
- 6.30. Local Plan policy A1 requires all development to protect the quality of life of occupiers and neighbours and states that planning permission will be granted unless it causes unacceptable harm to amenity. The relevant amenity considerations identified in the policy in this case are visual privacy, outlook, sunlight daylight and overshadowing and construction impact.
- 6.31. The pre-application advice raised concern about the potential impact of the roof extension and roof terrace on any residential properties to the rear of the site. The table below includes an assessment of Council tax records to establish the locations of residential properties to the rear of the site. It is not clear as outlined in the pre-application advice whether the windows directly adjacent to the site serve habitable windows.
- 6.32. The supporting Design and Access Statement also includes the diagram illustrated below to illustrate the relevant uses of neighbouring properties.

Planning Statement

27-28 Windmill Street



Surrounding properties		VOA (non-residential)	Council (residential) tax	Notes
31 Windmill Street	W1T 2JN	Shop and office (basement to fourth floor)	N/A	
29-30 Windmill Street	W1T 2JN	Shop and office (basement to third floor)	N/A	
46 Tottenham Road	W1T 2ED	Public house	Residential (no identification)	
6-10 Whitfield Street	W1T 2RE	Showroom and office (ground to fourth floor)	N/A	
2-4 Whitfield Street	W1T 2RB	Office (basement and ground)	Residential (first to fourth floor)	Screening required to western side of terrace.
47 Tottenham Court Road	W1T 2EE	Shop (basement and ground)	Residential (first to third floor)	Oblique angle; but screening required to eastern side of terrace.
48 Tottenham Court Road	W1T 2EF	Shop (basement to third floor)	N/A	
49 Tottenham Court Road	W1T 2EG	Shop (basement and ground) and office (first to third floor)	N/A	



Daylight and Sunlight

- 6.33. In line with the pre-application, the application is supported by a Daylight and Sunlight Assessment prepared by Rights of Light Consulting.
- 6.34. The report assessed the impact to neighbouring properties at 2 to 4 & 6 to 10 Whitfield Street, 29 to 30 Windmill Street and 39 to 45, 46, 47, 48 & 49 Tottenham Court Road. With the exception of window 79 at 2 to 4 Whitfield Street, all windows which have a requirement for daylight, pass the Vertical Sky Component test. Window 79 achieves a before/after ratio of 0.78, which is very close to the target of 0.8 stated in the BRE guide. The report states that all rooms with a requirement for daylight pass the daylight distribution test. It is noted that the BRE gives numerical guidelines which should be interpreted flexibly, as any increase in density will have a corresponding, noticeable and proportional reductions in daylight to some neighbouring properties.
- 6.35. All windows which have a requirement for sunlight pass the Annual Probable Sunlight Hours test, with the exception of windows 30, 33, 36 & 38 at 47, 48 & 49 Tottenham Court Road respectively. However, for the windows that do not pass, the report states that these appear to be living rooms from the consultants external observations and therefore would not be required to be tested under the BRE guidelines.

Privacy/ Outlook / Sense of Enclosure

- 6.36. The pre-application advice raised that an assessment would also have to be made on the impact on the amenity of neighbouring occupiers in terms of any loss of outlook or sense of enclosure as a result of the proposed extensions to the existing building.
- 6.37. To ensure the amenity of neighbouring residents is protected, the massing of the proposed extension at is stepped back from the boundary to avoid any overlooking. The proposals include 1.8m high privacy screens at either end of the terrace to prevent overlooking to residential properties.
- 6.38. The proposed flat roof at fourth floor and balcony at fifth floor are required to provide vital amenity for the office tenants. The design includes privacy screens at both end of the terraces to prevent overlooking into the neighbours to the east and west with residential uses above ground floor.

- 6.39. As illustrated in the photographs below, 6-10 Whitfield Street has been built with sloped rooflights along the boundary. The rooflights have a mirrored glass finish to mitigate the views into their space from 27-28 Windmill Street.

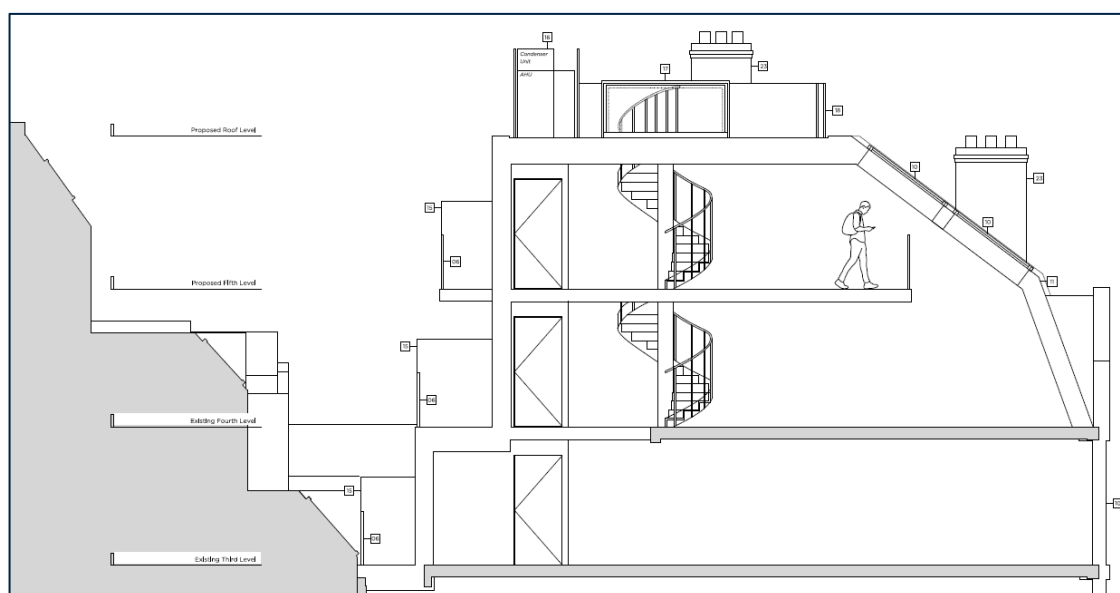


View of neighbours rooflights from existing 3rd floor



View from existing 4th floor roof access

- 6.40. The section drawing below illustrates the proposed external terraces to the rear of the property. As outlined above, the terraces at third, fourth and fifth level will all be screened by metal balustrading and privacy screens of 1.8M high to protect the privacy of neighbouring residents.



Proposed Section EE

Construction Management

- 6.41. The application is supported by a draft construction management plan pro-forma prepared by Mayer Brown Limited.
- 6.42. In terms of the impacts of the construction period, the application is also supported by a draft pro-forma which demonstrates the applicant's commitment to managing the construction process in accordance local requirements. A final Construction Management Plan will be submitted post determination of the application, as required.
- 6.43. The applicant accepts the implementation support contribution of £3,920 and Construction Impact Bond of £7,500 secured as a Section 106 planning obligation if planning permission were to be approved.

Highways

- 6.44. The application is supported by a highways note prepared by Mayer Brown which assesses the access arrangements, cycle provision, car parking provision and trip generation associated with the proposed development. The site is located in a PTAL 6b zone, indicating that it is highly accessible by sustainable transport modes.

Car Parking

- 6.45. Policy T2 Parking and car-free development states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. The development will be car-free in compliance with Policy T2.

Cycle Parking

- 6.46. Policy T1 states that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough. The policy states that in order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development:
- provides for and makes contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietways Network, Cycle Super Highways and;

- provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan
- makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.

6.47. The London Plan minimum cycle parking standards as Table 10.2 states that for use class B1 in areas with high cycle parking standards that 1 long-stay space is required per 75sqm and 1 short-stay space per 500sqm will be required. For the proposed development, this equates to two long-stay spaces and one short stay would be required for the proposals.

6.48. The long stay cycle parking is proposed to be located in the basement within one of the existing pavement vaults. The proposals seek to provide 3 long-stay cycle spaces in excess of policy requirement, however due to the size of the vault area, it is not possible to provide the one short-stay space.

6.49. The supporting heritage note prepared by Mayer Brown states that there a significant number of visitor cycle spaces located on Windmill Street, Whitefield Street and Store Street, in close proximity to the proposed development.

Trip Generation

6.50. The report states that a small increase in pedestrian and public transport trips are expected in the AM and PM peak hours, however it is considered that these can be easily accommodated on the existing bus and rail network.

Waste

6.51. The existing refuse strategy will be maintained, whereby the refuse is taken out to kerbside on collection day, ready to be serviced directly from Windmill Street.

Lightwell

- 6.52. In reference to the lightwell, the highways note states that Transport for London published the fourth edition of their Streetscape Guidance document in 2019, which sets a standard for London's streets and spaces by applying best practice design principles. Page 209 outlines the 'Footway clear zone design standards', setting out that the **minimum acceptable unobstructed width should be 1,500mm wide** and the preferred minimum is 2,000mm. However, an unobstructed width of 1,000m is stated as an absolute minimum, provided this was not continued for more than a length of 6m.
- 6.53. The proposed lightwell will leave a remaining unobstructed footway **width of 2,014mm**, well in excess of the absolute minimum and minimum acceptable thresholds, and just exceeding the preferred minimum. The supporting note by Mayer Brown states that the proposals are fully in line with TfL guidance on footway clear zones.
- 6.54. The note states that this is corroborated by the Governments Inclusive Mobility Document (published in 2005), which sets out in paragraph 3.1 that "*a clear width of 2000mm allows two wheelchairs to pass one another comfortably*". The report concludes that the proposed lightwell is therefore also wholly in line with Government Inclusive Mobility principles.

Energy and Sustainability

- 6.55. Policy CC1 'Climate change mitigation' states that the Council require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 6.56. Policy CC2 states that the Council will ensure development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation.
- 6.57. The Council will promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy; and require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met. It does so by demonstrating sustainable energy practices in line with the London Plan Energy Hierarchy (Policy SI 2), by requiring new developments to:
- Use less energy (Be Lean); – Supply energy efficiently (Be Clean)

- Use renewable energy (Be Green)
- Monitor, verify and report on energy performance (Be Seen)

- 6.58. The application is supported by an Energy Assessment prepared by Webb Yates. In line with the Local and London Plan, Planning Policy, and the project Planning conditions, this energy statement outlines the Environmental Design Strategy for the development and demonstrates the energy efficiency and renewable energy measures applied are able to achieve the required onsite carbon reductions in line with the energy hierarchy.
- 6.59. A 61% savings in carbon emissions is achieved. This is in compliance with the London Plan policy of min 35% carbon reduction over the Part L 2013 baseline through onsite measures. The additional Camden Local Plan requirement for 20% reduction of carbon emissions through onsite renewable technologies is currently not met. As previously explained the reason for this is due the main difference between the Lean and Green scenario in how heating is supplied.
- 6.60. As the proposed development, an office, is cooling dominated, it marginally does not meet this requirement. The use of additional renewable technologies to generate electricity, such as PV panels, are not feasible due to the limited space available onsite. However as this energy strategy has outlined, all measures within the means available for the project have been taken to achieve a significant improvement over Part L, Local and London Plan requirements.
- 6.61. The energy strategy proposed meets the Building Regulations Part L2B requirements and is aimed to achieve the best sustainability and energy efficiency. The statement outlines that in order to make the development net-zero carbon an offset payment of £15,343 is required.
- 6.62. The proposals are therefore compliant with Camden policies CC1 and CC2 and Policy SI 2 of the London Plan.

Noise

- 6.63. Policy A4 states that the Council will seek to ensure that noise and vibration is controlled and managed, and that development should have regard to Camden's Noise and Vibration Thresholds. The Council will not grant planning permission for:

- development likely to generate unacceptable noise and vibration impacts; or
- development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

- 6.64. The application is supported by a Noise Impact Assessment prepared by KP Acoustics Limited which outlines compliance with the relevant noise criteria set by Camden in line with Policy A4.
- 6.65. The proposals seek to install 4 No. Mitsubishi P200-YKM2 on the flat roof to provide fresh air and heating and cooling throughout the building. The submitted noise report states that measured noise levels allowed a robust glazing specification to be proposed which would provide internal noise levels for all office space environments of the development commensurate to the design range of BS8233. The report concludes that the noise emissions from the proposed plant units would not have an adverse impact on the nearest residential receivers.
- 6.66. In line with the recommendations of the noise report, the condensers will be within a louvred enclosure. The Design and Access Statement advises that a 1100mm balustrade around the perimeter of the flat roof will also protect anyone from falling while maintaining the automatic opening vent above the stair. The proposals are therefore compliant with Policy A4.

Flood Risk and Drainage

- 6.67. Policy CC2 states that the Council will require development to be resilient to climate change and all development should not increase, and wherever possible reduce surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- 6.68. The pre-application advice raised that the development should *'not increase, and where possible reduce, surface water runoff through increasing permeable surfaces and the use of Sustainable Drainage Systems'*
- 6.69. The site does not fall under any categories within Camden's Local Area Requirements for Planning Applications (2018) for which either a Drainage Report or Sustainable Drainage Systems (SuDs) strategy are required. The proposed development does not incorporate a new or extended basement and is not a vulnerable development in an area at risk of flooding, which are requirements for a Drainage Report.

- 6.70. In addition, the total GIA of the development as proposed will still remain under 1000m² of floorspace and therefore will not be assessed as a major application, for which a SUDS strategy, including completion of Camden's drainage proforma, is required. There is therefore no requirement to submit a SUDs strategy, however in light of the pre-application advice a report prepared by Expedition.
- 6.71. The report outlines that the building occupies the entire footprint of the site and there will be no change to the building footprint or roof area. On this basis, there will be no change to the impermeable area on the site and therefore there will be no increase in surface water runoff. Given the constrained nature of the site, it is not possible to introduce permeable surfaces or sustainable drainage features and therefore it is proposed to match the existing surface water runoff in compliance with Policy CC2.

7. Conclusions

- 7.1. This statement has been produced on behalf of our client to support a planning application for the following development at 27-28 Windmill Street:

Replacement of the front façade, erection of a single storey extension and mansard at roof level following demolition of the existing 4th floor level, reinstatement of a front lightwell, reconfiguration of the entrance, repositioning of plant and creation of roof terrace and three terraces to the rear all in connection with the office use of the building.

- 7.2. The general thrust and intent of local and regional policy seeks to protect office floorspace in sustainable locations. The proposals ensure the longevity of an existing office and employment generating use in this sustainable and accessible location through enhancing its current provision. The proposals will also provide an enhancement to the contribution that the site makes to the character and appearance of the conservation area, providing a more contextual front elevation through improved facing materials, and detailed design.

- 7.3. The statement finds that the development proposals represent sustainable development in the context of the National Planning Policy Framework (NPPF) and the 'Development Plan,' securing the following planning benefits:

- Optimising and making effective use of brownfield land through the increase in quantum and quality of workspace in a highly sustainable and well connected location;
- Attracting existing and new workers to the area that will support local businesses; and
- Enhancing the character and appearance of the site and surroundings by introducing a new facade of high quality design and architectural merit.