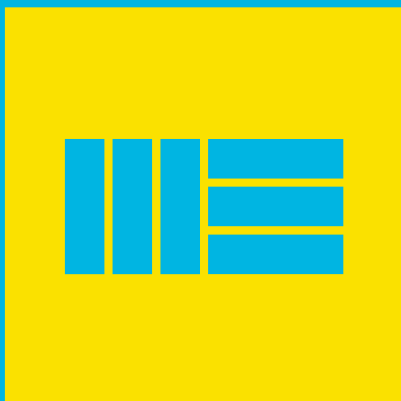


24 ENDELL STREET

PLANNING STATEMENT

22 OCTOBER 2021



THIS IS THE CONTENTS

1.0 EXECUTIVE SUMMARY	1
2.0 INTRODUCTION	2
3.0 SITE BACKGROUND.....	5
4.0 DEVELOPMENT PROPOSALS	7
5.0 PLANNING POLICY FRAMEWORK.....	9
6.0 PLANNING POLICY ASSESSMENT	11
7.0 CONCLUSIONS	24

1.0 EXECUTIVE SUMMARY

- 1.1 This Planning Statement forms part of the planning application (“the Application”) submitted by Montagu Evans on behalf of Patrizia UK Limited (“the Applicant” or “the Client”) to the London Borough of Camden (“the Council” or “LBC”) for the conversion and extension of 24 Endell Street, London, WC2H 9HQ (“the Site” / “the Building”) to provide office accommodation, studio and associated works to the Building (“the Proposed Development” or “the Scheme”) **(Section 2)**.
- 1.2 The Building comprises seven storeys including ground floor and four upper storeys with a double basement. The Site is the former Hospital Club, located on Endell Street, between the junctions of Short’s Gardens and Betterton Street in Covent Garden. It is located within the London Borough of Camden (“LBC”) **(Section 3)**.
- 1.3 The Building has a long history operating as a hospital. In 1749 the British Lying-In Hospital was established at the Site and closed in 1913. The Site was then occupied in 1923 by St Paul’s Hospital until 1992. From 2003, the Building changed use and became a private members’ club (Sui Generis) for people in the creative industries, known as the ‘The Hospital Club’ or ‘H Club’. As of 2020, the Hospital Club closed and the Site is currently vacant **(Section 3)**.
- 1.4 The Site is located with the Seven Dials Conservation Area but is not a listed building. Within the Seven Dials Estate Conservation Area Statement (1998) there is reference to St Paul’s Hospital as making a positive contribution to the character and appearance of the Conservation Area **(Section 3)**.
- 1.5 The Proposals seek a refurbishment and change of use of the Building from a private members’ club (Sui Generis Use) to offices and (Class E), retention and refurbishment of the studio (Sui Generis) and enlargement of existing cycle & shower facilities, replacement and reconfiguration of rooftop plant, to accommodate additional office space. This would deliver 84 sqm of new gross internal commercial floorspace in a highly accessible Central London location, further contributing to London’s commercial aims through high quality and flexible space **(Section 4)**.
- 1.6 The Scheme has been developed as part of Pre-Application discussions with the local planning authority and pre-submission consultation with ward councillors, local residents and stakeholders **(Section 6)**.
- 1.7 The Proposed Development would ensure that the Site is brought back into its optimum use through the creation of a high-quality office building with modern and efficient floorplates that would generate employment opportunities. In addition to the provision of studio space that would support Camden’s creative industries **(Section 6)**.
- 1.8 The design would be of high quality that responds to the surrounding context, including preserving and enhancing the Conservation Area’s character and appearance and an enhancement to the building’s positive contribution. It has also been designed to limit the impact on neighbouring residential (and other uses’) amenity **(Section 6)**.
- 1.9 Overall, the Proposed Development is in accordance with the national, regional and local planning policy, including other material considerations such as emerging policy and guidance. The Scheme constitutes sustainable development and would provide a number of planning benefits over and above the existing situation **(Section 7)**.

2.0 INTRODUCTION

2.1 This Planning Statement forms part of the planning application (“the / this Application”) submitted by Montagu Evans on behalf of Patrizia UK Limited (“the Applicant” or “the Client”) to the London Borough of Camden (“the Council” or “LBC”) for works for the refurbishment, conversion and extension of 24 Endell Street, London, WC2H 9HQ (“the Site” / “the Building”) to provide office accommodation, studio and associated works to the Building.

2.2 The description of development for this Application for full planning permission, is as follows:

“Change of use of ground and upper floors of the building from members' club (sui generis) to use as offices (Class E), enlargement of existing cycle & shower facilities, replacement and reconfiguration of rooftop plant, to accommodate additional office space (Class E). Retention and refurbishment of basement to allow for continued studio use (sui generis)”.

2.3 The Proposals (“The Proposed Development” / “The Scheme”) have arisen from the opportunity to reuse the existing, empty building which has been vacant since March 2020.

2.4 Full details of the Proposed Development are set out in the separate Design and Access Statement that accompanies this Application, prepared by Buckley Gray Yeoman.

PRE-APPLICATION ENGAGEMENT

2.5 Pre-application consultation has been undertaken with LBC which has informed the design of the Scheme. A pre-application meeting was held with LBC officers on 15 December 2020. The pre-application feedback received is summarised below:

- Loss of Use – The principle of the loss of a member’s club (Sui Generis) was supported;
- Change of Use – The principle for the proposed office accommodation (Class E) was supported;
- Physical Changes – Officers were generally comfortable with the scale and nature of physical alteration, including a new fifth floor and roof terrace;
- Sustainability – Officers outlined the Proposals would need to consider sustainability, BREEAM and energy; and
- Affordable Workspace – Officers interested in the use of the studio as affordable workspace and required further information.

2.6 The Proposals and design were subsequently amended based on LBC officers’ feedback and a follow-up pre-application meeting with LBC was held on 23 April 2021. The pre-application feedback received from that meeting is summarised below:

- Betterton Street Elevation – Officers supported the proposed amendments to the façade;
- Short’s Gardens Elevation – Proposals to remove the existing window to create a door were required to be reconsidered;

- Endell Street Elevation – Officers recommended a mansard roof or subservient roof to minimise impact on 22 Endell Street (Grade II listed); and
- Affordable Workspace – It was discussed that the studio could be let out for a period of time at rates reduced below market levels. It was agreed that further discussion would be required.

2.7 There has been a significant amount of public engagement during the development of the Proposals where the scheme was generally well received. In summary, the following consultation activities were undertaken by the project team to raise the profile of the site, engage with residents, local stakeholders and local councillors:

- 21 July 2021 – Covent Garden Community Association
- 21 July 2021 – Holborn and Covent Garden Ward
- 18 August 2021 – Tin Pan Alley Traders Association

2.8 The submitted Statement of Community Involvement (SCI) prepared by Concilio outlines the public engagement undertaken in greater detail.

PURPOSE AND FORMAT OF PLANNING STATEMENT

2.9 The purpose of this Planning Statement is to provide information to allow for an informed assessment of the Proposed Development against relevant national, regional and local planning policy and other material considerations.

2.10 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the Application have been taken into account. This Statement brings together the findings of the technical reports identified below and, having regard to these, provides a balanced planning assessment of the merits of the Proposals.

2.11 The scope of supporting information has been established with regard to the national and local list requirements, alongside feedback during the course of pre-application engagement with LBC officers.

2.12 A Document Schedule has been prepared for the application. **Table 2.1** below lists the application document and the project team member responsible for each document:

Table 2.1 – Schedule ES-1 of Documents for Submission

DOC REF.	DOCUMENT TITLE	AUTHOR
1.	Schedule ES-1: Document Schedule	Montagu Evans
2.	Covering Letter	Montagu Evans
3.	Application Form (Full Planning Permission) (with Ownership Certificates)	Montagu Evans
4.	Community Infrastructure Levy Form	Montagu Evans
5.	Schedule ES-2: Drawing Schedule	Montagu Evans
6.	Site Location Plan (1:1250)	Buckley Gray Yeoman
7.	Site Plan (1:500)	Buckley Gray Yeoman
8.	Application Drawings (Existing, Demolition & Proposed)	Buckley Gray Yeoman
9.	Design and Access Statement	Buckley Gray Yeoman
10.	Planning Statement	Montagu Evans

DOC REF.	DOCUMENT TITLE	AUTHOR
11.	Transport Statement	Velocity
12.	Framework Travel Plan	Velocity
13.	Construction Management Plan	Velocity
14.	Acoustic Report	Sandy Brown
15.	Daylight and Sunlight Report	Prism City
16.	Energy Report	GDMP
17.	Sustainability Statement	Verte
18.	Air Quality Assessment (including Construction Dust Risk Assessment)	SLR
19.	Statement of Community Involvement	Concilio

2.13 This Planning Statement demonstrates that the overall Scheme would:

- Deliver the sustainable development of a vacant building within Central London, in line with the overarching approach to development outlined in the NPPF;
- Deliver development that would contribute positively to the delivery of a mix of uses in Camden, consistent with its strategic objectives and the objectives at all tiers of planning policy;
- Provide for new and additional commercial floorspace in a highly accessible CAZ location and further contributing to London's commercial aims through high quality and flexible space;
- Ensure that the Site is brought back into its optimum use, through the creation of a high-quality office accommodation and studio with modern and efficient floorplates and spaces;
- Optimise the Site in providing additional employment opportunities with the generation of jobs;
- Deliver a design of high-quality architecture that would be well-related to the surrounding context, including preserving and enhancing the character and appearance of the Seven Dials Conservation Area and the setting of nearby listed buildings;
- Deliver a high-quality design which promotes sustainability measures throughout its design, construction and lifetime of the building. This includes the design achieving a BREEAM rating of Excellent (74.66%) and carbon savings of in the order of 64%; and
- Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development which would promote other means of travel such as cycling (through provision of new cycle spaces) and walking.

2.14 **Section 3** of this Statement provides background information on the Site, including its planning history. **Section 4** sets out details of the Scheme. **Section 5** summarises the planning policy relevant to the Site. The Application proposals are assessed against these policies in **Section 6**. A summary and conclusions are contained within **Section 7**.

3.0 SITE BACKGROUND

- 3.1 The Site comprises a 7 storey (G, UB, LB + 4) building known as 'The Hospital Club'. The existing accommodation includes a range of uses including: TV studio, exhibition space, film screening room, public and private members restaurants, music recording studios, gallery, members bar, meeting rooms and offices. In addition, the Building includes short-stay residential accommodation for club members, situated on the third floor.
- 3.2 The main entrance is located on Endell Street, which provides access to a reception area, lifts and staircase. The Site includes an off-street internal service bay within the Building itself, located at ground floor level with the entrance for vehicles and pedestrians from Betterton Street and the exit to Short's Gardens.
- 3.3 The existing facades on Short's Gardens and Endell Street characterised by historic red brick with stone detailing. This is contrasted with the modern yellow brick façade and metal detailing on Betterton Street.
- 3.4 The Site is located within the London Borough of Camden ("LBC") and is in close proximity to the southern boundary of LBC, where it meets Westminster City Council.
- 3.5 The Site is bound by Short's Gardens (to the north), Endell Street (to the west) and Betterton Street (to the south), all of which are reasonably narrow streets with double yellow lines and one way traffic flows plus designated residents' parking and loading bays. To the east, the Building shares a party wall with properties on Short's Gardens and Betterton Street.
- 3.6 The surrounding buildings accommodate a mixture of uses, mostly commercial, but there are also a significant number of residents nearby. The closest residential premises are flats at Dudley Court on the opposite side of Short's Gardens, flats at Betterton House on the opposite side of Betterton Street, a residential house at 24 Betterton Street, plus flats above shops on Endell Street.
- 3.7 The Site is located within the Seven Dials Conservation Area but is not a statutorily listed building. Within the Seven Dials Estate Conservation Area Statement (1998), the Site is identified as St Paul's Hospital and as making a positive contribution to the character and appearance of the Conservation Area.
- 3.8 The surrounding area contains a number of historic buildings and designated heritage assets. in the Building is in close proximity to the following assets:
- 22 Endell Street – Grade II Listed;
 - Brownlow House, 24 Betterton Street – Grade II* Listed
- 3.9 The Site benefits from a PTAL of 6b and is highly accessible to public transport, benefiting from close proximity to London Underground stations (including Covent Garden, Tottenham Court Road and Holborn), providing access to the Central, Northern and Piccadilly Lines. Charing Cross Station also provides access to National Rail services.
- 3.10 The Environment Agency's flood map for the area shows that the Site is located within Flood Zone 1 at low risk of flooding.

PLANNING HISTORY

- 3.11 The Building has a long history of operating as a hospital. In 1749 the British Lying-In Hospital was established at the Site and closed in 1913. The Site was then occupied in 1923 by St Paul's Hospital until 1992. From 2004, the Building changed use and became a private members club for people in the creative industries, known as the 'The Hospital Club' or 'H Club'. The Hospital Club closed in March 2020.
- 3.12 Undertaking a search of LBC's online planning register, the following relevant results were obtained:
- 3.12.1 On the 10 July 2014, planning permission (ref: 2013/5200/P) was granted subject to S106 Legal Agreement for the: *"Change of use at third floor level from ancillary offices to 15 overnight bedrooms for use by members, guests and general public as part of overall use of site as a members club (Sui Generis)."*
- 3.12.2 On 20 March 2012, an application (ref 2012/0976/P) was submitted for: *"Variation of the details of the method of waste storage and removal, approved on 18/09/01 (ref: PSX0104540) pursuant to condition 6 of planning permission dated 7/04/00 for the redevelopment of site to accommodate various arts-based uses (ref: PS9904338/R1)."* The application following reconsultation with residents reviewed the servicing arrangements and highway works. The application was withdrawn.
- 3.12.3 On 4 October 2005, planning permission (ref: 2004/1230/P) granted subject to a S106 Deed of Variation for: *"Variation of condition 11 (permitted hours for the service bay), condition 12 (permitted customer capacity of public and private restaurants), and condition 13 (permitted hours of use for private members restaurant)."* The permitted hours of service bay are: 7am to 10pm on Mondays to Fridays, 9am to 6pm on Saturdays, and 10am to 2pm on Sundays; permitted hours of members restaurant are: 8am to midnight on Mondays to Fridays, 10am to midnight on Saturdays to Sundays.
- 3.12.4 On the 7 April 2000, planning permission (ref: PS9904338/R1) was granted for the *"Redevelopment to provide a building of basement, ground and four upper floors plus plant, for arts-based uses including recording studios, photographic studio, screening room, offices, members lounge and meeting room, restaurant, conference, training, information, and storage rooms, public art gallery with ancillary retail space and residential accommodation with retention of facades to Short's Gardens and Endell Street."* This application included the facilitation of 17 units of offsite housing on 188-189 Drury Lane and 1-3 Newton Street, to be located in buildings currently of B1 use. Of these, Newton Street was converted to 9 units of affordable housing stock, to be accessible to persons with disabilities.

4.0 DEVELOPMENT PROPOSALS

4.1 As set out in **Section 2** of this Statement, the Application seeks planning permission for the refurbishment, extension and conversion to provide an office building providing modern floorplates for commercial use.

4.2 The Scheme would involve:

- Change of use of the main building from members' club (Sui Generis) to offices (Class E) use;
- Creation of 84 sqm (GIA) commercial floorspace uplift through:
 - Reduction of roof plant for the creation of a fifth floor and south facing roof terrace;
 - Retention and refurbishment of existing external building fabric and frame;
 - Internal modifications to the Building, to enable a range of floor configurations around a single core;
- Reuse and refurbishment of the studio at basement floors with designated studio entrance on Betterton Street; and
- Provision of flexible ancillary reception use on the ground floor and creation of additional cycle parking spaces.

4.3 The existing and proposed gross internal floor areas (GIA) for each level are set out in the table below:

LEVEL	EXISTING GIA (SQM)	DEMOLISHED GIA (SQM)	PROPOSED GIA (SQM)
Floor 5	93	93	165
Floor 4	766		766
Floor 3	859		868
Floor 2	874		882
Floor 1	864		858
Ground Floor	945		944
Upper Basement	661		661
Lower Basement	960		960
Total	6022	93	6106

4.4 The Proposals have been developed with due regard to the context to the existing building, including being situated within the Seven Dials Conservation Area and the proximity to the nearby Grade II 22 Endell Street and Grade II* Brownlow House.

4.5 A key objective for the Proposals is to optimise the quality of the commercial accommodation provided on the Site, to ensure that the existing building is fit for purpose as a modern office building and can continue to provide the standard of accommodation and amenities sought by modern office occupiers. The impact of the scale, mass and form of development has been a key driver in the design process and has sought to minimise impacts on nearby sensitive receptors, including existing residential accommodation. A further objective is to ensure

the studio space is refurbished, to support a cultural use and attractive creative industries. This is considered in more detail in **Section 6**.

4.6 The existing and proposed gross internal floor areas (GIA) for each use are set out in the table below:

EXISTING USE	EXISTING GIA (SQM)	PROPOSED USE	PROPOSED GIA (SQM)
Plant	93	Plant	0
Club House (including Service Yard)	4308	Service Yard	447
Studio	1621	Studio	1798
Office	0	Office	3861
Total	6022	Total	6106

- 4.7 A total of 3,861 sqm (GIA) of office accommodation will be provided on the ground and upper floors. The existing entrance on Endell Street will be utilised providing access to the ground floor office reception. There will also be a flexible ancillary reception use on the ground floor to act as a wellbeing space.
- 4.8 A total of 1,798 sqm (GIA) studio accommodation will be provided on the upper basement and lower basement. A new entrance is proposed on Betterton Street, with access to a separate studio reception on the ground floor.
- 4.9 Full details of the Proposals and a complete area schedule are provided within the Design and Access Statement prepared by Buckley Gray Yeoman.

5.0 PLANNING POLICY FRAMEWORK

5.1 This Application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context, and **Section 6** provides an assessment of the Application against the policies and guidance contained within these documents.

NATIONAL PLANNING GUIDANCE

5.2 The revised National Planning Policy Framework (the “NPPF”) was published on 20 July 2021 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements, as well as previous versions of the NPPF, first published in 2012. The NPPF sets out the Government’s approach to planning matters and is a material consideration in the determination of planning applications.

5.3 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 11 states that decisions should apply a presumption in favour of sustainable development and goes onto state 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.”

5.4 In March 2014, the Government published the Planning Practice Guidance (PPG) which is a material consideration in relation to planning applications. The PPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level. The PPG is a material consideration in the determination of applications.

STATUTORY FRAMEWORK

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

5.6 The Statutory Development Plan for the Site comprises the:

- London Plan (March 2021)

- London Borough of Camden Local Plan (July 2017)
- London Borough of Camden Policies Map (August 2021)
- London Borough of Camden Site Allocations Plan (September 2013)

SUPPLEMENTARY PLANNING GUIDANCE

5.7 LBC has published a number of adopted planning guidance documents which are material considerations in respect of the Application including:

- Amenity CPG (January 2021)
- Community Uses, Leisure and Pubs CPG (January 2021)
- Design CPG (January 2021)
- Employment Sites and Business Premises CPG (January 2021)
- Energy Efficiency and Adaptation CPG (March 2019)
- Transport CPG (January 2021)

5.8 In addition to the above, the Seven Dials Estate Conservation Area Appraisal and Management Strategy (1998) is a material consideration in the determination of this Application.

5.9 The remainder of this Statement identifies the key issues relevant to the determination of the Application and considers these in the context of relevant policy guidance.

5.10 The documents submitted as part of this Application also make reference to other technical guidance and legislation which is relevant to particular planning issues.

SITE SPECIFIC DESIGNATIONS

5.11 The Site is the subject of the following designations under the LBC Policies Map (August 2021):

- Central London Area
- Archaeology Priority Area
- Seven Dials Estate Conservation Area

6.0 PLANNING POLICY ASSESSMENT

6.1 Within this section, we assess the component parts of the proposed development against the statutory development plan and other material considerations as outlined in **Section 5**.

LOSS OF EXISTING USE

6.2 The existing building has been used as a private members' club known as the 'Hospital Club' comprising arts-based uses including studios, photographic studio, screening room, since first permitted in 2000. However, the Hospital Club closed permanently during the coronavirus pandemic in March 2020. The Site has since become vacant.

6.3 As the existing space within the building is bespoke to the Hospital Club and its operation as a private members' club, it has not been possible to attract suitable occupiers of the Building for continued use as a private members' club. This has been compounded by the impact of the coronavirus pandemic.

6.4 The lawful use of the Building (private members' club) is considered to be Sui Generis, which is confirmed by the available planning history. Within the Camden Local Plan (2017), there is no adopted planning policy which explicitly seeks to retain or resist the loss of private members' clubs. In addition, the Camden Planning Guidance (CPG): Community uses, leisure facilities and pubs (January 2021) does not seek to protect or retain private members' clubs.

6.5 As such, the 'loss' of the existing private members' club (Sui Generis) is considered to be acceptable in planning policy terms.

PRINCIPLE OF OFFICE DEVELOPMENT

6.6 The NPPF, at Paragraph 20 states that strategic policies should make sufficient provision for commercial development, whilst Paragraph 81 states that planning policies should meet anticipated needs for office uses.

6.7 Policy E1 (Offices) of the adopted London Plan outlines new and refurbished provision of office accommodation should be supported in London. For Central London, Policy E1 seeks to recognise and address the strategic and distinct needs of its office market by sustaining and developing its unique and dynamic clusters of 'world city' and other business environments.

6.8 LBC Local Plan Policy G1 (Delivery and Location Growth) requires development to take place within the expected growth areas and highly accessible locations of the borough. The Site is located in Central London (in Camden), deemed a highly accessible location for a greater concentration of development. These areas are considered to be generally suitable for a range of land uses, including those that attract a large number of journeys and for high density development that will help deliver growth in Camden.

6.9 Local Plan Policy G1 seeks to meet Camden's objectively assessed needs of 695,000 sqm of office floorspace by 2031 and will deliver this through 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.

6.10 Local Plan Policy E1 (Economic Development) seeks to secure a successful and inclusive economy in Camden by creating conditions for economic growth and harnessing the benefits for local residents and businesses.

6.11 Relevant to this Application, Policy E1 seeks to:

- *“support businesses of all sizes, in particular start-ups, small and medium sized enterprises;*
- *maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;*
- *support local enterprise development, employment and training schemes for Camden residents;*
- *encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;*
- *direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000 sqm of office floorspace between 2014 and 2031;*
- *expect the provision of high speed digital infrastructure in all employment developments...”*

6.12 Furthermore, Local Policy E2 (Employment premises and sites) encourages the provision of employment premises and sites in the borough.

6.13 The proposed change of use to office accommodation would secure provision of employment. It is estimated that the Proposals could deliver approximately 300 full-time equivalent (FTE) office jobs when fully occupied, representing a significant quantum of employment generation which is a clear public benefit that would be delivered by the Proposals.

6.14 The proposed office floorspace would increase competitiveness in the area and meet policy aspirations at all levels to increase business floorspace in CAZ and London’s global business status. The enhancement of office space and recording studio reflects the varied function of the CAZ without compromising residential and other sensitive uses.

6.15 In summary, the delivery of office floorspace as part of the Proposals is fully compliant with adopted Policy E1 and E2, as such is considered acceptable in principle.

PRINCIPLE OF STUDIO

6.16 Policy E8 (Sector growth opportunities and clusters) of the London Plan references the need for diverse range of employment opportunities and that Camden will support development of business growth and sector-specific opportunities.

6.17 The reuse of the studio could generate employment opportunities in the creative industries.

6.18 Policy HC5 (Supporting London’s culture and creative industries) of the London Plan outlines the continued growth and evolution of London’s diverse cultural facilities and creative industries is supported.

6.19 Local Policy C3 (Cultural and leisure facilities) requires *“protection of cultural and leisure facilities”*. This is also stated in Camden’s Employment Sites and Business Premises CPG (January 2021) which aims to sustain the boroughs cultural and leisure offering by retaining uses.

6.20 The supportive text in Camden’s local plan to Policy C3 adds the *“cultural and leisure facilities can contribute to townscape value and the special character and appearance of conservation areas.”*

- 6.21 The existing studio would be retained and refurbished. Originally designed specifically for the H Club, the retention of the studio would preserve the arts and musical history of the Building.
- 6.22 The operation and functionality of the studio has been considered against the proposed office use. The design and separation of uses ensures that they can both effectively operate.
- 6.23 Furthermore, the studio retains its presence in Covent Garden's local cultural landscape, which is an important cluster of cultural activities and creative industries. Providing economic and social benefits.
- 6.24 Therefore, the principle to retain the studio fully accords with London and LBC policies.

AFFORDABLE WORKSPACES

- 6.25 Policy E3 (Affordable Workspace) of the London Plan outlines that in "*defined circumstances*" planning obligations may be used to secure affordable workspace (in the B Use Class) at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose.
- 6.26 Camden Planning Guidance: employment sites and business premises (January 2021) states that the Council will seek to secure an element of affordable SME workspace from large scale employment developments with a floorspace of 1,000 sqm (GIA or gross internal area) or more. Paragraph 38 of the CPG states that the Council will also consider alternative suggestions for providing affordable workspace.
- 6.27 As the Proposals involve the change of use of more than 1,000 sqm GIA, it is anticipated that the Council will seek the provision of affordable workspace. Ongoing discussions are currently taking place with LB Camden and local interest groups in order to ascertain how the ambition for affordable workspace provision on the Site, or a suitable alternative can be achieved.
- 6.28 The final affordable workspace provision or a suitable alternative will be agreed during the determination of the planning application.

DESIGN PRINCIPLES

- 6.29 Section 12 of the NPPF, advocates the development of "*high quality, beautiful and sustainable buildings and places*". Of which Paragraph 130 sets out the design development will need to consider:
- (a) *"will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - (b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - (c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - (d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - (e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks;*
and

- (f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*
- 6.30 Chapter 3 of the adopted London Plan sets out the Mayor’s policies on a number of issues relating to London’s places and spaces and how these can be overcome with good design principles.
- 6.31 Policy D3 (Optimising site capacity through the design-led approach) outlines development proposals should follow a design-led approach which requires consideration of design options to determine the most appropriate form of development that responds to a site’s context to create a safe and inclusive environment.
- 6.32 Policy D4 (Delivering good design) requires a design and access statement to be submitted in order to demonstrate that proposals meet the design requirement of both the London and Local Plans.
- 6.33 Buckley Gray Yeoman have prepared a Design and Access Statement (dated September 2021) that forms part of the Application. This document sets out in detail an evaluation of the Scheme’s design and the manner in which this has progressed as a result of the consultation undertaken. The Design and Access Statement sets out the design strategy and how it responds to the context of the existing building and surrounding area.
- 6.34 Policy D5 (Inclusive Design) states that development proposals should achieve the highest standards of accessible and inclusive design. Proposals should:
- (a) *“be designed taking into account London’s diverse population*
- (b) *provide high quality people focused spaces that are designed to facilitate social interaction and inclusion*
- (c) *be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment*
- (d) *be able to be entered, used and exited safely, easily and with dignity for all*
- (e) *be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.”*
- 6.35 To support the change of use to office accommodation, internal modifications are required, mainly a new floor arrangement around a single core. There would also be retention and refurbishment of existing external building fabric, frame and fenestration. The office would be accessed from Endell Street, whereas the studio would have a separate entrance from Betterton Street.
- 6.36 During the refurbishment of the external facade, high regard will be given to the restoration and preservation of architectural and decorative details particularly on the Endell Street and Short’s Gardens. Where replacement is required, materials will be like for like to retain the character and appearance of these facades.
- 6.37 Betterton Street façade is already more modern in appearance. Therefore, it would see new and enlarged windows created, to follow the façade rhythm of the existing fenestration, whilst also providing enhanced access to natural light for the proposed office accommodation.
- 6.38 The enhancement in plant equipment no longer requires bulky equipment to be located on the roof. Indeed, the existing roof level plant detracts from the Conservation Area and appearance of the building. There is an

opportunity to improve the roof and provide utilised office space in the form of a fifth floor, with a south facing roof terrace.

6.39 The Design and Access Statement sets out that inclusive accessibility measures that have been incorporated into the design.

HERITAGE CONSIDERATIONS

6.40 The existing building is not a listed but is located within the Seven Dials Conservation Area. The Seven Dials Estate Conservation Area Statement (1998) refers to the Site, identified as St Paul's Hospital, as a positive contribution to the character and appearance of the Conservation Area.

6.41 The Site is within the proximity to a number of other listed buildings. Of relevance are 22 Endell Street (Grade II Listed) and Brownlow House (Grade II* Listed).

6.42 The Site is within the Archaeological Priority Area although there are no subterranean works proposed. Therefore, the Proposed Development would not impact any archaeological assets.

6.43 With respect to this Application, the applicable statutory provisions are:

- Section 66(1) the determination of applications; and
- Section 72(1) with regard to conservation areas.

6.44 Section 66 (general duty as respects listed buildings in exercise of planning functions) of the 1990 Act, requires that when determining applications, the local planning authority or the Secretary of State, "*shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*"

6.45 Having regard to the above, the statutory provision is satisfied if development proposals preserve a listed building and/or the setting of a listed building. The meaning of preservation in this context is taken to be the avoidance of harm.

6.46 Section 72 (General duty as respects conservation areas in exercise of planning functions) of the 1990 Act requires that, in the exercise of all planning functions, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the area. The statutory provision is satisfied if development proposals preserve or enhance the character or appearance of a conservation area. Character relates to physical characteristics but also to more general qualities such as uses or activity within an area. Appearance relates to the visible qualities of the area.

6.47 Improvements to setting, enhancing the significance of an asset or our ability to appreciate that, attract great weight in the planning decision making process under the terms of Paragraph 193 of the NPPF.

6.48 Paragraph 194 of the NPPF states that:

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."

- 6.49 Policy HC1 (Heritage conservation and growth) of the adopted London Plan states development proposals should have regard for surrounding heritage assets and archaeological assets. In both instances, their significance should be conserved. Proposals should avoid harm and identify enhancement opportunities.
- 6.50 LBC Local Plan Policy D2 (Heritage) outlines that LBC will preserve and, where appropriate, enhance the rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.
- 6.51 The Seven Dials Conservation Area, designated in 1998, is noted for its range of building types and uses, not dominated by period or style of building, but rather a combination which has created the special character of the area.
- 6.52 Endell Street is referenced in the Seven Dials Estate Conservation Area Statement (1998) for “*interesting architectural diversity, with many distinctive buildings*”. The street was constructed in 1846 following plans by Pennethrone (successor to Nash) for improvements to London. Predominantly the street was used for commercial buildings, but this has since changed to include residential development.
- 6.53 Within the Seven Dials Estate Conservation Area Statement, St Paul’s Hospital (now 24 Endell Street) is described as making a positive contribution to character and appearance of the Conservation Area. The Statement also notes “*a mixed-use development proposal for St Paul’s Hospital on the corner with Betterton Street has been agreed (April 2000)*”. This Application related to the Members’ Club.
- 6.54 The main building fronting Endell Street and Short’s Gardens is red brick Victorian building in the Gothic style. This can be described as the most significant element of the Building. The Betterton Street frontage is a mixture of more recent architectural styles. The interior has undergone reconfiguration and refurbishment since the approved 2000 planning permission. The proposed external design of the roof extension and terrace is sympathetic to the Building in terms of design and materiality. As the Proposed Development only seeks to reconfigure the interior to support office accommodation and external façade renovations, there will be no detrimental harm to the Building.
- 6.55 The significance of adjacent properties at 22 Endell Street (Grade II Listed) and Brownlow House (Grade II* Listed) will not be impacted by the Proposed Development. 22 Endell Street was a former stained-glass studio used by Lavers and Barraud, reputable manufacturers of Gothic Revival stained glass. The building’s façade reflects the Gothic style and dates from 1859. Brownlow House, of late C17 or early C18 origin, has been Grade II* listed for its preserved interior. The proposed roof would be chamfered to align with the angle of the listed building roof. The proposed roof extension also would be set-back so as not to be visible at street level on Betterton Street. For 22 Endell Street, it can be seen in the background when viewed from Endell Street but remains subservient in terms of scale and height and preserves the setting of the listed building.
- 6.56 The surrounding buildings are in a mixture of commercial, residential and retail uses. As stated in the Conservation Area Statement, the area is mixed in terms of architectural styles. The historically sympathetic design of the Proposals; using materials that are in keeping with the colour palette of the historic fabric, and a design that archives a subtle addition to the original building, ensures that the appearance and character of the Seven Dials Conservation Area would be preserved.
- 6.57 Overall, the Proposed Development would be acceptable in terms of according with the relevant policies on design and heritage, avoiding harm to the significance of the neighbouring listed buildings and the Conservation Area, and therefore the decision taker is able to discharge the statutory duties of the Planning (Listed Buildings and Conservation Area) Act 1990 and national and local planning policy.

RESIDENTIAL AMENITY

- 6.58 The NPPF states that development should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
- 6.59 Local Plan Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity. To support this policy, LBC has produced extensive guidance within its Amenity CPG.
- 6.60 Careful consideration has been given to the amenities of the surrounding buildings. The form and massing of the proposed extensions have been carefully designed to cause minimal impact to both sunlight and daylight reaching neighbouring properties, as well as the potential impact from pollution.
- 6.61 Camden's CPG on Amenity (January 2021) requires development to be designed to protect the privacy of occupiers of both existing and proposed dwellings. Separation between the windows of habitable rooms in existing properties directly facing the proposed development is minimised by the existing streets. Therefore, the 18m minimum distance consideration does not apply.
- 6.62 The Proposed Development has been designed to minimise proximity and overlooking to adjoining developments by maintaining adequate distances between existing and proposed habitable windows ensuring that there is no adverse impact on the amenity of the neighbouring residential properties as a result of overlooking or loss of privacy.
- 6.63 The windows on Endell Street would be either retained or replaced with like for like and would not cause privacy or overlooking issues. Furthermore, the proposed lighting fixtures on the external façade at Endell Street would not impact neighbouring properties or cause light pollution.
- 6.64 The creation of new windows at first and second floor levels on Betterton Street would serve office accommodation, which would typically be used during normal office hours. As such, no greater overlooking or privacy impacts are envisaged than from the previous use of the third floor as effectively hotel bedrooms, where the hours of use could have been 24hr. The studio entrance on Betterton Street would feature a glazed frontage to protect privacy.
- 6.65 Furthermore, the proposed fifth floor and roof terrace would be set back, which would maximise the distance between this level and surrounding properties.
- 6.66 Reviewing the Proposals against planning policy, it is considered that the Scheme would not cause detrimental harm to surrounding properties.

DAYLIGHT AND SUNLIGHT

- 6.67 Local Plan Policy A1 is supported by the Camden CPG on Amenity (January 2021) which provides further guidance on the expectations that LBC has when considering the impact of schemes on daylight and sunlight levels. It notes that levels of reported daylight and sunlight will be considered flexibly taking into account site-specific circumstances and context.
- 6.68 Daylight and Sunlight Report has been prepared by Prism City which determines the impact of the Proposed Development on surrounding properties. The assessment has been undertaken in accordance with the Building Research Establishment ("BRE"), "*Site Layout Planning for Daylight and Sunlight*".

- 6.69 For daylight and sunlight, all rooms and windows assessed to the surrounding residential buildings or those with residential content fully adhere to the BRE target values where either no loss or minimal losses are recorded.
- 6.70 Overall, the scheme is therefore considered to be acceptable with regard to daylight and sunlight considerations and is fully compliant with the BRE guidance.

TRANSPORT

- 6.71 Section 9 of the NPPF promotes sustainable transport and will require applications for development under Paragraph 112 to:
- (a) *“give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
 - (b) *address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
 - (c) *create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
 - (d) *allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
 - (e) *be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*
- 6.72 Policy T1 (Strategic approach to transport) and Policy T2 (Healthy Streets) of the adopted London Plan supports sustainable transport options including public transport, walking and cycling in order to promote healthy streets. In order for the promotion of sustainable transport, development proposals will have to reduce car dominance.
- 6.73 At the local level, Local Plan Policy T1 (Prioritising walking, cycling and public transport) is the primary transport policy which promotes sustainable transport in the borough. The policy seeks to ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links.
- 6.74 The Site is located within Central London and therefore has access to a number of key services, which are within walking distance of the Site. The Site has an excellent public transport accessibility (PTAL 6b), which ensures excellent links to the Underground, National Rail and bus services.
- 6.75 Therefore, a ‘car free’ development is entirely appropriate for this Development. With Blue Badge accessible car parking available on-street if required.
- 6.76 London Plan Policy T4 (Assessing and mitigating transport impacts) states that when required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.
- 6.77 A Transport Assessment and Travel Plan have been prepared by Velocity. The assessment identified negligible long-term transport impact on the number of trips taking place to and from the development. The proposed use

(8 total trips) will be significantly lower net trip generation compared to the existing use (17 total trips). With nine less servicing trips overall, and two less servicing trips taking place on street.

6.78 Overall, the proposed development satisfies the relevant policies set out in national, regional and local policy and guidance through encouraging sustainable transport use, providing good access to local services, and minimising additional pressure on local highways. As such, the Proposals should be found acceptable in terms of transport and highways.

CAR PARKING

6.79 The NPPF requires local authorities to consider parking provision within new developments, based upon their accessibility and the opportunities for public transport, and facilitate the provision of ultra-low emission vehicles.

6.80 Policy T6 (Car Parking) of the London Plan states proposals should now be car-free developments. This is also outlined in Policy T6.2 (Office Parking) in the CAZ. For proposals, car-free development means there should be no provision for general car parking. Only required spaces for disabled persons will be supported.

6.81 Local Plan Policy T2 (Parking and car-free development) limits the availability of parking and requires all new development in the borough to be car-free. It is noted that the policy also supports the redevelopment of existing car parks for alternative uses. Car parking would be limited to spaces designated for disabled people where necessary and essential operating or servicing needs.

6.82 The Proposed Development will be car-free as a result of its sustainable location and excellent accessibility to public transport and active travel modes. One Blue Badge bay could be accommodated on-street within close proximity to the site. In addition, Blue Badge holder would be eligible for a 'Green Badge' to enable permit parking in loading bays. It is therefore in accordance with adopted policy and SPD guidance.

CYCLE PARKING

6.83 Both the NPPF and the London Plan promote cycling in locations which can be made sustainable.

6.84 Policy T5 (Cycling) of the adopted London Plan supports proposals that include provision of cycle parking in accordance with the Mayor's minimum cycle parking standards. The Site is also located within an area where a higher minimum cycle parking standard will be applied for short-stay and long-stay office uses.

USE CLASS	LONG-STAY	SHORT-STAY
Business Offices (Use Class E)	1 space per 75 sqm	First 5,000 sqm: 1 space per 500 sqm Thereafter: 1 space per 5,000 sqm (GEA)

6.85 To promote cycling in the borough and ensure a safe and accessible environment for cyclists, LBC will seek to ensure that development:

- provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within CPG7: Transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development; and
- makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.

- 6.86 A total of 60 two-tier long stay cycle parking spaces have been proposed as part of this development, along with 1 accessible bay and 4 Sheffield stands, totalling 65 Long stay spaces. The proposed quantum of long stay cycle parking is 5 spaces more than required by London Plan standards. Twenty short stay spaces are provided in the service yard, in the form of two-tier racking.
- 6.87 Cycle parking would be provided in line with London Plan standards. A total of 56 long stay cycle parking spaces and 9 short stay spaces will be provided for the office space. As the studio floorspace on site is not proposed to change as part of this application, and therefore could be excluded from cycle parking calculations. However, in line with best practice principles additional cycle a total of 8 long stay spaces and 2 short stay spaces are proposed for the studio space.
- 6.88 A total of 66 long stay cycle parking spaces have been proposed as part of this development, including 1 accessible bay and 2 Sheffield stands. In addition, 22 short stay spaces are provided in the service yard, in the form of two-tier racking. This quantum of cycle parking is in accordance with London Plan policy requirements.

SERVICING AND REFUSE

- 6.89 Local Plan Policy CC5 (Waste) seeks to make Camden a low waste borough and aims to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled / composted by 2020 and aspiring to achieve 60% by 2031. The policy also seeks to make sure that developments include facilities for the storage and collection of waste and recycling.
- 6.90 The refuse store is located at the ground floor level towards the rear of the Building within the on-site service yard and would be collected via Short's Gardens. Refuse vehicles will continue to service the site on-street from Short's Gardens, with Refuse Collection Vehicles (RCV) stopping outside the service yard gate to collect the bins. No change is proposed to the existing collection arrangements.
- 6.91 London Plan Policy T7 (Deliveries, servicing and construction) states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- 6.92 Vehicle access for servicing and delivery vehicles will be maintained as per existing arrangements, with vehicles under 2.4 m tall accessing of Betterton Street and exiting onto Short's Gardens. Larger servicing vehicles service the Site from the existing on-street service bay on Endell Street.
- 6.93 The existing delivery time restrictions are proposed to be retained as follows; Monday to Friday 7 AM – 10 PM; Saturday 9 AM – 6 PM; and Sunday 10 AM – 2 PM. The adjacent loading bay on Endell Street, used by larger vehicles accessing the site, has the following restrictions; Monday to Saturday 8:30 AM – 6:30 PM; other times permit parking only.

ENERGY AND SUSTAINABILITY

- 6.94 The NPPF supports the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourages the reuse of existing resources, including conversion of existing buildings, and encourages the use of renewable resources.

- 6.95 The London Plan sets out a number of core policies for major developments with regard to reducing carbon dioxide emissions and providing energy in a sustainable manner. Policy S1 2 (Minimising greenhouse gas emissions) sets out a minimum on-site reduction of at least 35 per cent beyond Building Regulations 152 is required for major development.
- 6.96 At the local level, Camden Local Plan Policy CC1 (Climate change mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and operation.
- 6.97 Camden's CPG on Energy Efficiency and Adaptation (January 2021) requires all development to reduce carbon dioxide emissions by following the energy hierarchy. For non-residential development a 15% reduction (beyond part L Building regulations) is required. In addition, all non-residential development of 500 sqm or more floorspace to be BREEAM Excellent.
- 6.98 An Energy Report has been prepared by GDM Partnership following 'Energy Assessment Guidance' Greater London Authority guidance on preparing energy assessments as part of planning applications (April 2020).
- 6.99 The statement identifies that the proposed energy efficiency measures for the redevelopment include highly efficient heating, cooling and ventilation systems throughout the building which achieves significant carbon savings of 64% when compared to the existing building.
- 6.100 Results also show with the development being an office, it is not feasible to connect to a district heating network due to the low water demand and as such this technology is not technically, functionally or economically feasible. Therefore, it is proposed to install a VRF (Variable Refrigerant Flow) system for heating and cooling which reduces carbon emissions from the development from day one.
- 6.101 In summary, the Energy Report demonstrates that the Proposals would achieve the beyond the necessary energy efficiency standards and carbon reduction requirements in accordance with policy and is considered to be acceptable.
- 6.102 A Sustainability Assessment has been prepared by Verte to address the proposed sustainable design and construction measures and concludes the Proposals would achieve BREEAM Excellent (74.66%). As such, BREEAM Excellent rating is targeted to be achieved.

CONSTRUCTION MANAGEMENT

- 6.103 The supporting text to Local Plan Policy A1 (paragraph 6.12) outlines that measures required to reduce the impact of demolition, excavation and construction works must be outlined within a Construction Management Plan (CMP).
- 6.104 In accordance with adopted plan policy and Camden Planning Guidance, the Construction Management Plan (CMP) Pro Forma has been drafted and submitted with this application by Velocity.
- 6.105 This demonstrates how construction impacts will be minimised, in relation to site activity during works and the transport arrangements for vehicles servicing the Site.
- 6.106 We note that this draft Pro Forma will be progressed to a final version should planning permission be permitted. As is usual in Camden, this is likely to be the requirement of clause in the Section 106 legal agreement.

NOISE

- 6.107 Policy D14 (Noise) of the adopted London Plan states that noise should be managed and mitigated in order to improve health and wellbeing. The management of noise is about encouraging the right acoustic environment, both internal and external, in the right place at the right time.
- 6.108 LBC Policy A4 (Noise and vibration) requires all noise to be controlled and managed and should have regard to Camden's Noise and Vibration Thresholds.
- 6.109 An Acoustic Report has been prepared by Sandy Brown based on the requirements of the London Borough of Camden. The representative measured background sound levels were $L_{A90,15min}$ 45 dB during the day, and $L_{A90,15min}$ 42 dB during the night. The relevant plant noise limits at the worst affected existing noise sensitive premises are L_{Aeq} 35 dB during the day, and L_{Aeq} 32 dB during the night. These limits are cumulative and apply with all plant operating under normal conditions.
- 6.110 In summary, the Proposed Development (including the studio) would not raise any residual significant or other adverse impacts on the health and/or quality of life for existing neighbouring dwellings in the vicinity of the Site, or future occupiers of the development. It is therefore concluded that the Proposed Development complies fully with noise related national, regional and local planning policy.
- 6.111 Sandy Brown state that an assessment of the proposed plant items associated with the Proposals would need to be carried out once the design has been developed. This can be secured by a condition.

AIR QUALITY

- 6.112 The NPPF, at Paragraph 181 sets out that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified.
- 6.113 Policy SI 1 (Improving air quality) of the adopted London Plan outlines development proposals should not:
- (a) *“lead to further deterioration of existing poor air quality*
 - (b) *create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits*
 - (c) *create unacceptable risk of high levels of exposure to poor air quality”*
- 6.114 LBC Local Plan Policy CC4 (Air Quality) requires the impact of development on air quality to be mitigated and ensure that exposure to poor air quality is reduced in the borough. The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken to the actions identified in the Council's Air Quality Action Plan.
- 6.115 An Air Quality Assessment has been prepared by SLR. The Assessment looks at the potential dust impacts during the construction of the development and determines that the Site is at 'low risk' in relation to dust soiling effects on people and property, and 'negligible' in relation to human health impacts. Following mitigation measures during the construction phase would result in 'not significant' effects.
- 6.116 The Assessment also demonstrates that during the operational phase road traffic impacts associated with the operation of the Site can be considered as having an insignificant effect on local air quality.

6.117 Overall SLR outline that development has demonstrated to be Air Quality Neutral (at a minimum) based on the Greater London Authority's Air Quality Neutral guidance.

COMMUNITY INFRASTRUCTURE LEVY

6.118 Within this Application, consideration is given to the 'MCIL2' requirements which came into effect on 1 April 2019. The Site is located within the Central London area and therefore has an increased rate of £185 per sqm for office floorspace.

6.119 In addition to the above, LB Camden adopted its Community Infrastructure Charging Schedule in September 2020 which has taken affect since 30 October 2020. This outlines a rate of £110 per sqm rate for office developments within Zone A (Central Area).

6.120 A CIL Form has been submitted with this Application which outlines the relevant information for the Scheme.

7.0 CONCLUSIONS

7.1 This Planning Statement has assessed the Proposals against the adopted Development Plan, as required by Section 70 of the Town and Country Planning Act 1990. As explained in this Statement, the Proposals have been formulated having regard to the full range of Development Plan policies and other policy material considerations.

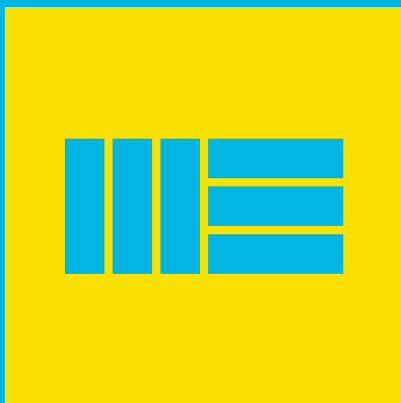
7.2 Having regard to the assessment undertaken within this Statement, we consider the planning benefits arising from this scheme can be summarised as follows:

- Deliver the sustainable reuse of a vacant building within Central London, in line with the overarching approach to development outlined in the NPPF;
- Deliver development that would contribute positively to the delivery of a mix of uses in Camden, consistent with its strategic objectives and the objectives at all tiers of planning policy;
- Provide for new and additional commercial floorspace, in a highly accessible CAZ location and further contributing to London's commercial aims through high quality and flexible space;
- Ensure that the Site is brought back into its optimum use, through the creation of a high-quality office accommodation and studio with modern and efficient floorplates and spaces;
- Optimise the Site in providing additional employment opportunities with the generation of jobs;
- Deliver a design of high-quality architecture that would be well-related to the surrounding context, including preserving and enhancing the character and appearance of the Seven Dials Conservation Area and the setting of nearby listed buildings;
- Deliver a high-quality design which promotes sustainability measures throughout its design, construction and lifetime of the building. This includes the design achieving a BREEAM rating of Excellent (74.66%) and carbon savings of 64%; and
- Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development which would promote other means of travel such as cycling (88 cycle spaces in total) and walking.

7.3 The Proposed Development is considered to be compliant with the adopted Development Plan for LBC. It is also in accordance with the adopted policies within the NPPF and London Plan.

7.4 It is considered that on the basis of the above, the planning benefits brought about by and through the scheme outweigh any harm. It is therefore considered that the Proposals are appropriate and planning permission should be granted.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.