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11 February 2022

Planning and Regeneration
London Borough of Camden
2nd Floor
5 Pancras Square
London
N1C 4AG

F.A.O. Josh Lawlor

Dear Sir / Madam

**24 ENDELL STREET, LONDON, WC2H 9HQ
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
APPLICATION FOR PLANNING PERMISSION – PLANNING REF. 2021/5347/P**

Following a site visit with Josh Lawlor (Planning Officer) on 15 December 2021 and a virtual “Teams” meeting on 24 January 2022, with Josh Lawlor & Rose Todd (Conservation Officer) we have reviewed & revised the proposed scheme (hereby referred to as the “February 2022 Scheme”). Accordingly, we now write to submit amended design proposals and supporting information that seeks to address comments received so far.

Therefore, on behalf of our Client, Patrizia UK Limited, we hereby enclose amendments to our application, to be read in conjunction with planning permission ref. 2012/5347/P at 24 Endell Street, London, WC2H 9HQ.

In addition to this letter, these amendments include the following information:

1. Document Schedule (Rev A) prepared by Montagu Evans, dated 11 February 2022;
2. Application Form prepared by Montagu Evans, dated 11 February 2022;
3. Community Infrastructure Levy (CIL) Form prepared by Montagu Evans, dated 11 February 2022;
4. Drawing Schedule (Rev A) prepared by Montagu Evans, dated 11 February 2022;
5. Drawings prepared by Buckley Gray Yeoman, dated 4 February 2022;
6. Design and Access Statement by Buckley Gray Yeoman, dated February 2022;
7. Daylight and Sunlight Report prepared by Prism City, dated 4 February 2022;
8. VU-City Images (x2) prepared by Buckley Gray Yeoman, dated 4 February 2022; and
9. Verified Views (x4) prepared by Rockhunter, dated 4 February 2022.

PLANNING RESPONSE

The purpose of this letter is to provide an overarching response to design matters which have been raised by statutory consultees, subsequent to the submission of the planning application in October 2021. Below we respond to the Conservation Officer's comments received on 2 December 2021 and the Covent Garden Community Association (“CGCA”) comments received on 10 December 2021.

Design

Endell Street

The Conservation Officer outlined concern of the disproportionately large shop front opening onto Endell Street and suggested a narrower, taller glazed area would sit better within the existing façade. Our proposal does not seek to alter the existing structure of the glazed display, rather the glazing itself would be made taller to match the height of the adjacent glazed door to improve proportions. This was presented on 24 January 2022, where officers considered that the existing proposal would improve the existing condition. No change is therefore proposed from what was submitted in October 2021.

Short's Gardens

The Conservation Officer acknowledged that a stone surround and mullion for the large window opening on the ground / first floor of Short's Gardens would improve the integration but recommended additional mullions and transoms to match windows at the first floor. As a result, we now seek to implement additional mullions and transoms to this glazed window.

The Conservation Officer also noted that the proposed rooflights on Short's Gardens do not line-through with the window openings below. We have reviewed this matter further to consider, what, if anything, can be done to address these comments. However, the windows are spaced such to provide an even distribution of light within the fourth floor accommodation. Furthermore, there is only 1 (no.) window at third floor, on the front of the building, such any 'mis-alignment' is only with the windows 2 floors below, rather than immediately below. Whilst we acknowledge this mis-alignment in elevation (dwg no. 1183-PL-GE-01-PL02), these rooflights would only be seen in glimpsed views and never read, as they are, as set out on the true elevation. Indeed, the nature of the mis-alignment is relatively minor (3 (no.) windows x 150 mm & 1 (no.) window x 400 mm). It is acknowledged that the 6 (no.) further rooflights now proposed do also not align with the windows below, but this mis-alignment is in the order of 25 mm per window, to a degree to be imperceptible. Indeed, these 6 (no.) further windows on Short's Gardens would not be visible from street level. All 10 (no.) windows are required, to provide adequate light into the fourth floor. For the reasons set out above, we consider these windows to be acceptable.

To clarify CGCA's comments regarding an additional door, which would replace a window on Short's Gardens, is not proposed as part of this application.

Betterton Street

The design team has reviewed the scheme and identified an opportunity to add eight glazed rooflights to the existing roof on Betterton Street. Full details are outlined in the amended Design and Access Statement.

The CGCA commented that the new openable windows on Betterton Street could impact the privacy of neighbouring residents and recommend a condition that seeks the windows to be coated or frosted. We acknowledge this comment but note that there are already windows present on all floors except the first floor. There would therefore be no significant additional infringement of privacy, from that which already exists. Indeed, office accommodation (generally 0800 to 1800, Mon to Fri), would be a far more compatible neighbour, that the existing lawful use i.e. that of a Members' Club, with bedroom and bar windows overlooking Betterton Street, 24/7. The proposed rooflights would not be visible from street level and would certainly not allow for any additional overlooking. We would therefore ask that no condition is imposed on the transparency any of the Betterton Street windows, albeit it would be acceptable to accept a condition that all openable windows are closed after 2000 hrs.

The CGCA also recommended a planning condition so that there would not be any queuing in the street to enter the building and that its hours of use should not extend beyond 2200 hrs, given the residential location. In addition, an obligation to ensure additional street lighting on the facades as part of the Section 106 Agreement. Given the nature of the potential use of the studio, we would not be willing to accept a 2200 curfew all year round, but are willing to work with LBC & CGCA to work up the wording of a condition to seek to address this comment. We would certainly be willing to discuss a planning condition regarding additional street lighting.

East Elevation

The design team seeks to amend the existing fourth floor terrace on the East Elevation. The existing terrace balustrade is glass and we propose to infill the rest of the terrace to create a 'glass box'. We regard this amendment as a minor alteration as it would not change the existing East Elevation nor have impact on the surrounding properties or neighbours.

Roof Pavilion and Terrace

The Conservation Officer made comments regarding the possible impact of the proposed roof extension on the roof line of the adjacent listed building (22 Endell Street). This was investigated further via verified views north and south on Endell Street. These view points were agreed with the Conservation Officer on 24 January. The verified view to the south shows the roof extension remains visible although the bulkiness is reduced due to the design setback and chamfered roof. The verified view from north of Endell Street shows only a minimal amount of the roof extension is visible. Furthermore, the north view only shows two rooflights on Short's Gardens.

The CGCA has sought a planning condition to restrict the hours of use of the roof terrace and a continuation of previous condition of no music to be played on terrace and no noise emanating from the building at any time. The Client accepts the principle of such conditions, but would ask that the hours of use condition could be worded as follows:

"The approved roof terrace shall be used for employment uses (Class E) only, and shall not be used outside the hours of 08:00 and 20:00 Monday-Friday."

The Design and Access Statement has been revised to support the following design amendments:

- Window at ground / first floor of Short's Gardens to be glazed with additional mullions and transoms (Dwg ref. 1183-PL-GE-01-PL02);
- Addition of six glazed rooflights to existing roof on Short's Gardens (Dwg ref. 1183-PL-GE-01-PL02);
- Addition of eight glazed roof lights to existing roof on Betterton Street (Dwg ref. 1183-PL-GE 02-PL02); and
- 'Glass box' infill of existing terrace on East Elevation (Dwg ref. 1183-PL-GE 04-PL01).

Daylight and Sunlight

Following the alterations to the East Elevation, we have asked our Daylight & Sunlight Consultant (Prism City), to review the amended proposals to consider what, if any, impact would result to neighbouring properties of this 'glass box' addition. Accordingly, we attach a revised version of the Daylight and Sunlight Report (dated 4 February 2022). This concludes that the February 2022 Scheme would fully adhere to the BRE Guide and that *"there will be no harm caused to the daylight and sunlight amenity to the surrounding properties as a result of implementation of the proposals."*

Change of Use

The CGCA noted that the application sought a change of use to office (Class E(g)) except for the basement which remains a studio. Due to the ability to change within Class E, CGCA would welcome a condition that restricts changing within a use class. As confirmed on the site visit with the Planning Officer, our Client is happy to accept a condition of this nature be imposed on this application.

SUMMARY AND CONCLUSION

In conclusion, the design amendments represented by this February 2022 Scheme and the additional information provided as part of this addendum are provided to address the Conservation Officer and CGCA's design-related consultation comments. We trust that these amendments will be welcomed by LB Camden and the CGCA.

We would be grateful if the LB Camden could confirm receipt of this application addendum by return. In the meantime, should any further clarification, information or assistance be required please do not hesitate to contact **Peter Bovill** (Tel. 020 7312 7456 / peter.bovill@montagu-evans.co.uk), **Anthony Brogan** (Tel. 020 7826 8629 / anthony.brogan@montagu-evans.co.uk) or **Eleanor Mazzon** (Tel. 020 3004 2918 / eleanor.mazzon@montagu-evans.co.uk) of this office in the first instance.

Yours faithfully

MONTAGU EVANS LLP

Montagu Evans LLP

Enc.