



**27 Great Queen Street, London**

**Planning and Design & Access Statement**

March 2022

## **1.0 Introduction**

- 1.1 This planning statement has been prepared by PJB Planning on behalf of the UGLE Property Investment Committee and accompanies a planning application seeking full planning permission for a change of use of the premises at 27 Great Queen Street from Use Class E(g)(i) Offices to carry out any operational or administrative functions to a Sui Generis private members club/leisure use.
- 1.2 The physical internal alterations to the Grade II\* listed building itself are covered by a listed building consent application soon to be submitted. Plans are included within this planning application show the proposed internal alterations to the building. This planning application therefore focuses on the principle of the change of use and planning issues that arise with this change of use.
- 1.3 The planning application includes the following documents:
- Accompanying letter
  - Planning Application form and ownership certificate
  - CIL form
  - Plans
  - Planning and Design & Access Statement
  - Heritage Assessment
  - Letter from local agent
  - Background to The Savage Club (1857 to present day)
  - Noise Assessment
- 1.4 This note also sets out the planning policy consideration of the proposed change of use and includes a section on the Design & Access Statement for the proposed development.

## **2.0 Application site and proposed change of use**

- 2.1 The application site comprises a terrace property along the northwest side of Great Queen Street. The listing dates the building back to c1733, and it has a single entry alongside the adjacent number 28 and 29. The heritage note submitted with this application provides more detailed about the listing of this Grade II\* listed building.
- 2.2 The gross internal floor area of the premises at No. 27 is 291.15 sq m.
- 2.3 In terms of other premises along Great Queen Street, at ground floor there are various commercial retail and restaurant premises along the northwest side of the street, with commercial premises and residential apartments at first floor and above. To the rear of the application site, properties that front Parker Street, include both residential and commercial/office premises.

- 2.4 Opposite 27 Great Queen Street is Freemason's Hall a Grade II\* listed building. The application site is also located with a Conservation Area.
- 2.5 The proposed change of use of the premises to Sui Generis leisure use will allow the The Savage Club to establish a new base for the club. Previously, it had occupied rooms at 1 Whitehall Place, but with growing numbers of members the accommodation at 27 Great Queen Street would provide for both existing and future needs of the Club. A statement is included with the application from the applicant, providing further information about The Savage Club and proposed use of 27 Great Queen Street.
- 2.6 The following describes the changes of use proposed at each floor level:

*Basement* – An archive storage area is proposed at the front of the building, to allow the Club to store its archive in a more accessible setting, with more dedicate space to allow both housing and displaying the material.

*Ground floor* – As well as the entrance to the premises, at the front of the building it is proposed to provide a library and cloakroom. At the back of this floor the existing rear projection will be used for rehearsal space for members of the club who are musicians.

*First floor* – Discreet alterations are proposed at first floor level to allow a small bar to be provided with club room.

*Second floor* – It is proposed that the second floor will provide a meeting room to members in the daytime during weekdays, and in the evening and weekends will be available to members to hire for small private functions. The rear part of this floor will be reconfigured as a pantry, so that food prepared off-site can be served.

*Third floor* – This floor will provide an office area for Club staff and storage of the Club's administration and records. At the front of this floor, an area is to be provided with desks to allow Members to who still come to Central London but who may no longer have physical offices, so creating a managed "hot-desk" area.

### **3.0 Relevant Planning Policies**

#### ***Adopted Local Plan***

- 3.1 The Camden Local Plan was adopted in 2017 and is used for determining planning applications.
- 3.2 In terms of planning designations, 27 Great Queen Street is located within a Conservation Area and a secondary retail frontage zone. The Metropolitan Walk also runs along Great Queen Street in front of the premises.

- 3.3 The last use of the premises was as an office throughout the building and classed as an employment generating use. The last office user vacated the premises in September 2020, and it has been nearly one and half years since the premises have been occupied.
- 3.4 The principal planning issue therefore relates to the consideration of the proposed change of use to Sui Generis private members club/leisure use under Policies E1 and E2 of the Adopted Local Plan.
- 3.5 Policy E1 seeks to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. Part g. i. of this policy states that the Council will:
- “support Camden’s industries by:*
- i. safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;”*
- 3.6 Part i. of Policy E1 goes on to state that the Council will:
- “recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.”*
- 3.7 Policy E2 provides further guidance about resisting the development of business premises and sites for non-business use unless it is demonstrated to the Council’s satisfaction that:
- a. the site or building is no longer suitable for its existing business use; and*
- b. that the possibility of retaining, reusing, or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.*
- 3.8 The Council also published in January 2021 a Supplementary Planning Document (SPD) that provides further guidance in relation to considering proposals for *“Employment Sites & Business Premises”*.
- 3.9 Paragraph 5 of the SPD defines the terms ‘business’ and ‘employments sites’ as the following uses:
- Offices, research and development and light industry.
  - General industrial uses.
  - Storage and distribution (warehousing).
  - Other unclassified uses of similar nature to those above, such as depots or building merchants, classed as Sui Generis.

- 3.10 The relevant parts of these policies and guidance to focus in relation to the proposed change of use at No.27 Great Queen Street, is the reference in Policy E1 to the importance of leisure uses, which is underlined above and within Paragraph 5 of the SPD where it refers to Sui Generis uses. Whilst the proposals at No.27 Great Queen Street would change the use of the premises from Offices to a Sui Generis use, the proposals include elements associated with office premises and as such would to some extent follow the guidance set out in Policy E2 of the adopted Local Plan.
- 3.11 Part a. of Policy E2 also assesses the suitability of the premises for its existing business use. Further guidance as to what factors are taken into account in assessing this are set out in paragraph 7 of the SPD, which states:
- *whether the premises are in a reasonable condition to allow the use to continue;*
  - *the range of unit sizes it provides, particularly suitability for small businesses;*
  - *the suitability of the location for any business use;*
  - *how the business use is related to other neighbouring/nearby land uses;*
  - *whether a lower quantum of replacement employment space is proposed as part of the development, and if so whether the nature of this space is considered to have the potential to offer equal or greater benefits to local people or businesses than the existing space.*
- 3.12 Particular attention is drawn to the last bullet point regarding the provision of a lower quantum of replacement employment space, which within this change of use application the employment use has not been completely lost and a hot desk arrangement along with the administration office proposed on the top floor would provide such a continued use.
- 3.13 Part b. of Policy E2 does requires alternative businesses uses of the premises need to be fully explored, before allowing a non-business use. It is considered that the heritage assessment and letter from a local agent support the proposed use and considers that all options have been fully explored for the use of the premises and that this proposed change of use will be sympathetic to the Grade II\* historic asset.
- 3.14 Other relevant adopted planning policies include:
- 3.15 Policy C3 *Cultural and leisure facilities* – This policy seeks to protect cultural and leisure facilities and highlights the need to provide alternative venues elsewhere within the Borough to protect against the loss of cultural heritage.
- 3.16 Policy D2 *Heritage* – This policy provides guidance and policy requirements for developments in Conservation Areas and to Listed Buildings, and primarily supports enhancements to the heritage assets. In the case of No. 27 Great Queen Street, the heritage assessment submitted confirms that the proposed change of use will create an enhancement to the Grade II\* Listed Building (and Conservation Area) that will be further enhanced by the continued use of the premises by the club in the long term. This is a significant material consideration to take into account in determining an application.

- 3.17 Policies A1, and A4 of the Adopted Local Plan provide guidance relation to impact on neighbours in respect of noise and impact on their amenity.
- 3.18 Policies T1 promote sustainable transport by prioritising walking, cycling and public transport, and Policy T2 seeks to limit the availability of parking and require all new developments in the borough to be car-free.

***London Plan 2021***

- 3.19 The London Plan 2021 provides further guidance in relation to the consideration of this application.
- 3.20 In relation to the principle of the change of use of the premises, the site is located within the Central Activities Zone (CAZ), where Policy SD4 applies. This policy recognises the need to provide office functions to meet demand for a range of types and sizes of occupier and rental values, but at the same time recognizing that the distinct environment and heritage of the CAZ should be sustained and enhanced. The policy also recognises the unique concentration and diversity of cultural and arts within the CAZ, which should be promoted and enhanced.
- 3.21 Policies E1 and E2 of the London Plan seek to promote and protect office space that provides for the current day market and standards required. Part C of Policy E2 acknowledges that where there is no reasonable prospect of the site being used for business purposes, consideration will be given to non-Class B uses.
- 3.22 Policy HC1 of the London Plan provides guidance of heritage assets and states:

*Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*

- 3.23 Policy HC5 of the London plan clearly states that the continued growth and evolution of London's diverse cultural facilities and creative industries is support. Parts 1) and 5) of this policy states that development proposals should:

*1) protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres and places with good public transport connectivity. To support this, boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, evaluate what is unique or important to residents, workers and visitors and develop policies to protect those cultural assets and community spaces.*

- 5) *seek to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues and/or facilities and spaces for outdoor cultural events.*

#### **4.0 Relevant Planning History**

- 4.1 Whilst there are various applications at No.27 during the 1980's and 1990's for various alterations to the listed building, there does not appear to be any planning history on the Council's website since 2000.
- 4.2 There are a whole variety of applications that have been submitted and determined on neighbouring properties. Of particular reference to the proposals at No.27 is a 2014 application granted planning permission at No. 19 to 21 Great Queen Street (LPA reference 2014/4958/P). This permission granted permission to change the use of the upper floors from offices to residential apartments, whilst retaining the retail use of the ground floor.
- 4.3 Although this decision pre-dates the 2017 Adopted Local Plan, the consideration of the loss of the office use was reviewed under similar criteria as required by current adopted planning policies. The conclusions of this assessment highlighted that substantial works would be required for the site to be attractive for modern day office occupation and significant refurbishment would be necessary.
- 4.4 From reviewing the application documents, a letter from CBRE was submitted providing general information about the condition of the premises at Nos. 19 to 21 and confirmed the length of time the premises had been left vacant. The agent also confirmed that there was a low level of interest in occupying the premises, and nothing came of the interest primarily due to the physical constraints and shortcomings of the space within the building. It was also highlighted that the cost of refurbishment to a modern office environment would be significant, and that office tenants generally seek flexible, single floor occupation with total open plan accommodation.
- 4.5 It does not provide a fully comprehensive marketing appraisal of the site, but has highlighted the shortcomings of the accommodation to continue as offices and that there had been a low level of interest, which had left the premises vacant.

#### **5.0 Design & Access Statement**

##### ***Amount***

- 5.1 The gross internal floor area of the building at No.27 Great Queen Street is 251.15 sq m. There is no increase in floor area proposed through this planning application, and alterations to the interior of the building are proposed, which listed building consent will be applied for separately.

5.2 Paragraph 2.6 of this Statement describes the proposed use of each floor. In terms of floor areas, this can be confirmed for each floor as follows:

- a) Pavement Cellar and Basement – (11.15 and 50.75 sq m) 61.90 sq m
- b) Ground Floor – 86.46 sq m
- c) First Floor – 51.17 sq m
- d) Second Floor – 50.04 sq m
- e) Third Floor – 41.58 sq m

#### ***Layout***

5.3 The proposed use of the building will provide an archive area within the basement; a library and rehearsal area at ground floor; members bar area at first floor; members meeting and private hire room at second floor; and administration office and hot desk area for members at third floor.

#### ***Scale***

5.4 There are no proposed changes to scale or proportions of the exterior of the buildings. Changes are proposed internally to accommodate the Clubs use of the building and also to bring it back to its former townhouse character.

#### ***Context and Use***

5.5 The application site is located within a Conservation Area and is also a Grade II\* listed building. The heritage context of the site and surrounding area, and its preservation and enhancement has therefore been a primary consideration for these proposals. The application site is also located along a street frontage that has a mix of uses that this proposed use would complement.

#### ***Landscape***

5.6 There are no landscape features attributed to this site and as such no landscape implications.

#### ***Access***

5.7 The proposed access to No.27 will continue to be from the single entrance off Great Queen Street, and access arrangements within the building will comply with the necessary standards required for this type of use.

## **6.0 Planning Considerations**

6.1 As this application is for a change of use of the premises, the main planning considerations relate to the principle of the change of use and also in this case the impact on neighbours' amenity.

6.2 The planning policy section of this Planning Statement has set out how applications such as this should be considered, and there is a balanced approach through both the Adopted Local Plan and the London Plan 2021 to protect Office uses within the right premises, but also promoting cultural uses and protecting heritage assets.



- 6.3 Both a heritage note and a letter from a local commercial agent has been provided with this application setting out how the premises at No.27 Great Queen Street do not lend themselves to a modern-day commercial office use.
- 6.4 The heritage note also highlights that the sensitive alterations proposed to the Grade II\* listed building for the proposed Sui Generis private members club/leisure use will both remove previous harmful internal works to the building and will bring the condition back to its former townhouse character. The proposed change of use and internal works proposed will also future proof the preservation and retention of the listed building in a much better state than its current condition.
- 6.5 Whilst the main use of the building will be for more cultural/leisure purposes, the proposals do include elements such as an archive storage, library, and an administration and hot desk office area that can often be associated with more of an office use. As such, the Office use of the building will not be completely lost through the proposed change of use. This proposed continued “office” element and use of certain parts of the building fall follow the guidance contained with the SPD which states that consideration should be given to: *whether a lower quantum of replacement employment space is proposed as part of the development, and if so whether the nature of this space is considered to have the potential to offer equal or greater benefits to local people or businesses than the existing space.*
- 6.6 Taking this advice further on board, the proposed change of use will provide a secure base and meeting place for the Savage Club, which has been in existence since 1857. The cultural benefits of providing this accommodation for the Club is a significant material consideration and supported by both Adopted Local Plan policies and the London Plan.
- 6.7 With regards to the impact on neighbours, The Club has provided details of the use of the building and a noise assessment has been included with the application. It is not consider the proposed use will be harmful to surrounding neighbours.
- 6.8 The other significant material consideration to take into account is the sustainability credentials of this proposal in that it will provide a facility and service to Members, many of whom work or live within the City, and the location of the premises in close proximity to Covent Garden and Holburn will promote walking and use of the underground, and as such promotes good sustainable qualities supported by both Local Plan policies and the London Plan.

## **7.0 Planning Conditions**

- 7.1 This planning statement has set out the justification for the proposed change of use and a noise report has been included with application establishing the impact of noise and disturbance and mitigation measures required to ensure the development does not have a unacceptable impact on neighbouring residents.

- 7.2 As a further measure to control any future impact from an alternative user and if the Council felt it was necessary, the applicant would be willing to accept a personal planning condition restricting the primary use of the premises to “The Savage Club”.
- 7.3 Regarding opening hours the intention is to run the private members club in the same way as it has been done in the past. The general opening times proposed are:
- Monday to Friday – 07:30 to 01:30
- Saturday, Sunday and Bank Holidays – 12:00 to 23:00
- 7.4 During the week, the proposed bar on the first floor would be open from 12:00 with last orders call at around 22:45. On dinner nights, the bar would stay open until 01:00.
- 7.5 At weekends, whilst the general open times are stated above, the bar and function room will available for private hire to members, rather than general use by private members.
- 7.6 The noise assessment has taken this into account in assessing the noise implications of the proposed change of use. Whilst the premises operating hours will be control by licensing laws and regulations, if it is felt necessary by the Council a condition could be imposed restricting the general opening hours of the premises to those stated in the above paragraph 7.3.

## **8.0 Conclusions**

- 8.1 This Planning and Design & Access Statement has primarily focused on the principle of the change of use of the premises from an office use to a Sui Generis private members club/leisure use.
- 8.2 The Statement sets out the planning policy considerations for this change of use application and balances the consideration between retaining an office use of the building and providing a secure base for The Club.
- 8.3 It is noted within the statement that the use of the building with an archive storage area, library and administration and hot desk office area will mean the Office use class will not be entirely lost, and the cultural and heritage benefits weigh the balance in favour of allowing this application.
- 8.4 It has also been demonstrated in this application that due to the impact on the heritage asset a complete office use of the premises to meet current standards is not supported from a heritage preservation perspective and the proposed change of use will be significantly more sensitive to the buildings Grade II\* listing.

- 8.5 A noise report has been submitted demonstrating the proposed use will not be harmful to neighbours' amenities.
- 8.6 It has also been concluded that the application site is in a highly sustainable location for the use proposed in this application.
- 8.7 As such, it is considered that the proposed change of use complies with relevant planning policies contained within the Adopted Local Plan and London Plan 2021, and planning permission should be granted accordingly.