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13 Fitzroy Street Planning Statement

DGE Fitzroy Street Limited

May 2022

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1.0 Introduction

1.1 This planning statement has been prepared by Lichfields on behalf of DGE Fitzroy Street Limited ('the applicant') to accompany a Minor Material Amendment (MMA) application to planning permission reference 2019/2198/P at No. 13-17 Fitzroy Street, London, W1T 4BQ.

1.2 On 10 July 2020, planning permission was secured at the site for:

“Construction of a two storey rooftop extension to Block B to create additional office (Class B1) floorspace, reconfiguration and alterations to the existing main entrance, atrium and external facade, creation of roof terrace and replacement of rooftop plant.”

1.3 DGE Fitzroy Street Limited, purchased 13-17 Fitzroy Street from Workspace Group in September 2021. Prior to this, the building was owned by Workspace Group, and was occupied by Arup and served as their headquarters. DWS Group will manage 13-17 Fitzroy Street on behalf of DGE Fitzroy Street Limited.

1.4 DWS is one of the world's leading asset managers and currently manages 12 office assets in London with an overall value in excess of £2 billion. Including 13-17 Fitzroy Street, four assets with a total net lettable area of over 450,000 square feet are due to undergo refurbishment or redevelopment over the period 2021- 2023 to further improve their office offer.

1.5 Post-acquisition, DWS has reviewed the approved scheme and identified further enhancement opportunities to create improved high quality office accommodation with the view of the space being made available to prospective tenants on a floorplate basis, rather than small, subdivided office accommodation. The proposals will result in an enhanced and attractive office offer which is likely to attract small and medium sized enterprises (SMEs).

Report Structure

1.6 This Planning Statement comprises the following chapters:

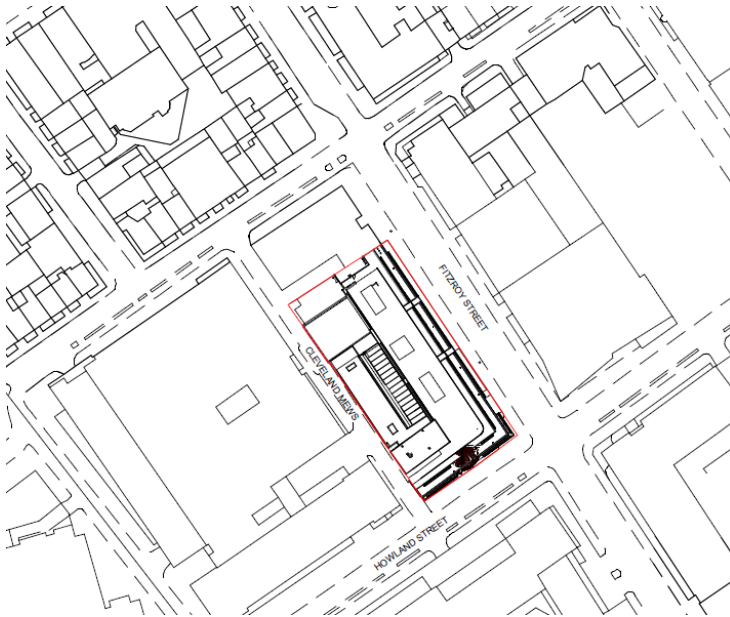
- **Section 2:** Background and context, including a description of the site and surrounding area and, summary of relevant planning history and details of pre-application consultation;
- **Section 3:** Details of the proposed development;
- **Section 4:** A summary of the planning policy context;
- **Section 5:** An appraisal of the main policy considerations relating to the proposed development; and
- **Section 6:** Concluding comments.

2.0 Site Background and Context

Site and Context

2.1 No. 13-17 Fitzroy Street comprises an office building of circa. 0.22 hectares located at the centre of the Fitzrovia district and within the London Borough of Camden.

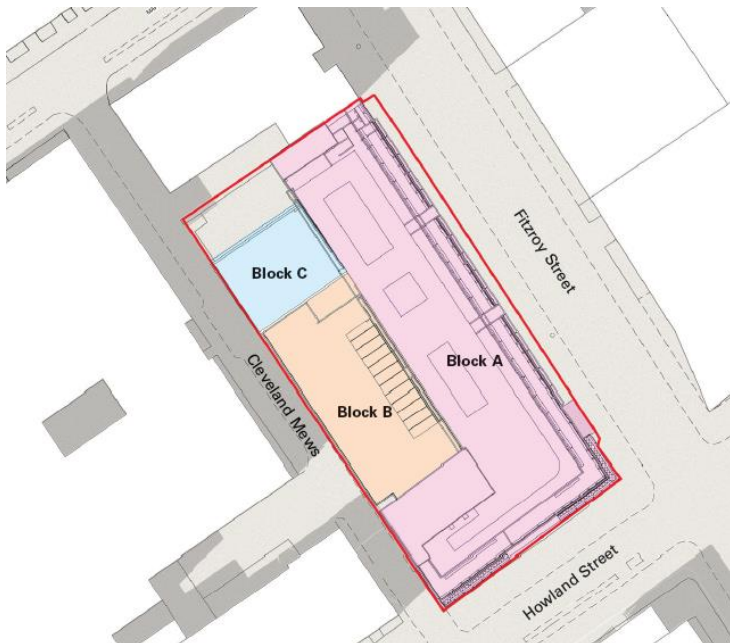
Figure 2.1 Site Location Plan



Source: Squire and Partners

2.2 The building comprises 3 blocks, as shown in figure 2.2.

Figure 2.2 Plan showing Blocks A, B and C



Source: Squire and Partners

- 2.3 Located to the south of Fitzroy Square, the site itself is bounded by the key roads of Fitzroy Street and Howland Street to the east and south, respectively. It is also bordered by Cleveland Mews to the west and Maple Street to the north.
- 2.4 While the site itself is not located within a Conservation Area, it is surrounded on four sides by neighbouring Conservation Areas. The Fitzroy Square Conservation Area lies to the north with the Charlotte Street Conservation Area to the south. The Bloomsbury and East Marylebone Conservation Areas are located to the east and west, respectively.
- 2.5 The Grade II listed BT Tower is located directly to the west of the site across Cleveland Mews. There are also a number of Grade II listed Georgian townhouses within the Fitzroy Square Conservation Area to the north, however the location of the site and nature of surrounding buildings means that the site does not fall within the setting of these buildings.
- 2.6 The site is located within the extent of the London View Management Framework (LVMF) Parliament Hill Panorama View 2a.
- 2.7 The site has a PTAL of 6b, representing the highest level of access to public transport services. Goodge Street Underground Station is located circa. 380m to the southeast of the Site and can be accessed from Tottenham Court Road. The station offers direct access to the Northern Line which runs a frequent service between Edgware and Morden. The site is also located within a 20-minute walking distance of both Euston Station and Kings Cross St Pancras Station, offering major regional, national and international transport hubs. The nearest bus stop (Goodge Street, Stop A), lies circa 300m to the south of the site.
- 2.8 Vehicular access is provided via Cleveland Mews to a lower ground level with parking provision for ten cars alongside a cycle store. The building is currently serviced via a loading bay and service yard also accessed via Cleveland Mews.

Planning History

- 2.9 In July 2020, planning permission was secured at the site for the extension and external alterations to No. 13-17 Fitzroy Street (ref. 2019/2198/P). The approved development comprised:
- “Construction of a two-storey rooftop extension to Block B to create additional B1 floorspace, reconfiguration of the existing main entrance and atrium and external façade alterations, alongside creation of a roof terrace and rationalisation and replacement of rooftop plant.”*
- 2.10 It was considered that the approved rooftop extension to Block B would create much-needed office floorspace to support the needs of businesses in LB Camden. The proposed approach also included internal alterations to subdivide the office building into smaller units in line with the Workspace Group model, although the internal changes themselves did not require planning permission.
- 2.11 Small scale design changes to the approved scheme were agreed by way of a Non Material Amendment Application ‘NMA’ in September 2021 (ref. 021/0056/P).

Pre-application Engagement

- 2.12 Formal pre-application engagement with LB Camden has been undertaken, including a meeting with Council Officers.
- 2.13 The pre-application feedback confirmed that the proposed changes to the approved scheme were generally considered to be acceptable by officers, subject to detailed matters being addressed in any updated submission which it was confirmed should be dealt with through an MMA application. This submitted s73 application addresses the feedback provided.

3.0 Proposed Development

- 3.1 Planning permission is sought for minor material amendments to planning permission ref. 2019/2198/P.
- 3.2 The proposed amendments to the approved scheme at the site are minor in nature and comprise the following:
- Ground floor façade amendments on the junction of Fitzroy Street and Howland Street including the addition of a glazed corner entrance to the office unit within Block A. The internal slab level will be lowered to facilitate this change;
 - Amendments to the size of the rooftop plant enclosure on Block A to align with the size of the revised plant equipment previously approved at the site (the plant enclosure was removed via an NMA, but following further investigations it has been identified that the plant enclosure is required);
 - Relocation of the approved biodiverse green roof from the recently approved Block B extension onto Block C alongside reinstatement of the existing roof lights at Block C. New roof terrace proposed for Block B for office tenant amenity; and
 - Black vertical cladding/glazing alterations to Block B.
 - Introduction of a louvered door at Lower Ground within the lightwell on Howland Street to provide access to below ground drainage.
 - Introduction of louvres at Lower Ground within the lightwell on Fitzroy Street to support the buildings overall servicing strategy; this will help to improve constrained floor to ceiling heights, and upgrade the facilities for building users.
- 3.3 DWS also intend to change the colour of the existing external metal ductwork, including the “bug” feature on the Howland Street elevation from green to black, to better reflect the surrounding area (see accompanying plans and DAS). The colour change will be achieved through painting existing materials on the unit. Officers have confirmed that these works can be undertaken under Permitted Development Rights – the colour change is referenced in the submitted drawings for information only.
- 3.4 The applicant is seeking to undertake internal refurbishments including the installation of a feature stair in the atrium to connect office floors and creation of an open plan floorplate. These internal works do not form part of the planning application and so the internal layouts included within the application drawings are provided for illustrative purposes only.
- 3.5 With respect to cycle parking, planning condition 4 requires that the level of cycling provision (142 cycle spaces) shown on the approved plans should be installed prior to occupation and permanently retained thereafter. Further investigation on site has identified that the floor to ceiling heights in the approved cycle parking area on the lower ground level of Block C were not adequate to allow the approved cycle parking layout to be implemented and used. It is therefore proposed to amend the layout to allow the approved number of spaces to be provided as useable safe and secure cycle parking spaces on site.
- 3.6 LB Camden’s pre-application advice response confirmed that the internal amendments do not require planning permission.

- 3.7 The proposed amendments to the approved planning permission are covered in more detail in the accompanying Design and Access Statement (DAS), produced by Squire and Partners.

4.0 **Planning Policy and Guidance**

4.1 In accordance with paragraph 38 (6) of the Planning and Compulsory Purchase Act 2004, regard should be given to the development plan for the determination of planning applications, unless material considerations indicate otherwise.

4.2 The planning policy framework relevant to the determination of the planning application is set out below.

National Planning Policy Framework (2021)

4.3 The Government published the revised National Planning Policy Framework ('NPPF') in July 2021 which sets out national policy on a wide range of planning matters. It confirms that the purpose of the planning system is "to contribute to the achievement of sustainable development" (para. 7) to meet the requirements of both the existing population and future generations. Para. 8 sets out the three dimensions of sustainable development – economic, social and environmental.

4.4 The NPPF identifies a presumption in favour of sustainable development (para. 10). Plans and decisions should apply this presumption in favour of sustainable development, and where development proposals accord with an up-to-date-plan, they should be approved without delay (para. 11.c).

4.5 One of the key elements for delivering sustainable development to help build a strong, responsive and competitive economy (para. 8).

4.6 Chapter 6 of the NPPF requires planning decisions to "*help create the conditions in which businesses can invest, expand and adapt*" and specifies that "*significant weight should be placed on the need to support economic growth and productivity, taking into account both local businesses needs and wider opportunities for development*" (para. 81).

4.7 Chapter 11 seeks to ensure that the use of previously developed land is maximised. Chapter 16 relates to conserving and enhancing the historic environment.

4.8 The following NPPF Chapters are of direct relevance to the proposed development:

- Chapter 6: Building a strong, competitive economy
- Chapter 11: Making effective use of land
- Chapter 12: Achieving well-designed places
- Chapter 14: Meeting the challenge of climate change, flooding and coastal change
- Chapter 16: Conserving and enhancing the historic environment

Statutory Development Plan

4.9 The Statutory Development Plan for the site comprises:

- a The London Plan (Adopted 2021);
- b The London Borough of Camden Local Plan (adopted 2017); and
- c The London Borough of Camden Site Allocations Plan (Adopted 2013).

The London Plan (adopted 2021)

4.10 The revised London Plan, adopted in March 2021, sets out a framework for how London will develop over the next 20-25 years. The site is subject of the following planning designations:

- 1 London Plan Central Activities Zone (CAZ)
- 2 London View Management Framework (LVMF) Parliament Hill Panorama View 2a

4.11 The following policies of the London Plan are considered relevant in the determination of this planning application:

- Policy GG5 (Growing a good economy);
- Policy SD4 (The Central Activities Zone – CAZ);
- Policy SD5 (Offices, other strategic functions and residential development in the CAZ);
- Policy D4 (Delivering good design);
- Policy E1 (Offices);
- Policy E2 (Providing suitable business space);
- Policy HC1 (Heritage conservation and growth);
- Policy HC4 (London View Management Framework);
- Policy T5 (Cycling)

4.12 Within the Development Plan, the site is subject to the following planning designations:

Camden Local Plan (adopted 2017)

4.13 Camden's Local Plan, adopted in July 2017, sets out the vision for shaping the future of the Borough and contains policies for guiding planning decisions. The site is subject of the following planning designations:

- 1 Central London Area
- 2 Fitzrovia and Bloomsbury

4.14 The following policies of the Camden Local Plan are considered relevant in the determination of this planning application:

- 1 Policy G1 – Delivery and location of growth
- 2 Policy H2 – Maximising the supply of self-contained housing from mixed-use schemes
- 3 Policy E1 – Economic Development
- 4 Policy E2 – Employment premises and sites
- 5 Policy A1 – Managing the impact of development
- 6 Policy A4 – Noise and vibration
- 7 Policy D1 – Design
- 8 Policy D2 – Heritage

- 9 Policy C5 – Safety and Security
- 10 Policy C6 – Access for all
- 11 Policy CC1 – Climate change mitigation
- 12 Policy CC2 – Adapting to climate change
- 13 Policy CC3 – Water and flooding
- 14 Policy T1 – Prioritising walking, cycling and public transport
- 15 Policy T2 – Parking and car-free development
- 16 Policy T4 – Sustainable movement of goods and materials

Camden Site Allocations Plan

- 4.15 While the site is not specifically allocated within the Camden Site Allocations Plan (September 2013), it falls within the Central London Area within which development is required to contribute towards London’s economic, social and cultural role while meeting the needs of local residents and respecting their quality of life.

5.0 **Assessment of Proposed Development**

Principle of Development

- 5.1 The NPPF promotes the efficient use of land and requires as much use as possible to be made of previously-developed land (Para. 117).
- 5.2 London Plan policy GG5 seeks “to ensure that London’s economy diversifies and that the benefits of economic success are shared more equitably across London”. Policy SD5 affords greater weight to offices and other CAZ strategic functions relative to new residential development within the commercial areas of Fitzrovia. Whilst the Fitzrovia commercial areas are not specifically defined, Fitzroy Street and the surrounding locality is heavily dominated by large-scale commercial buildings and should therefore be considered a commercial area.
- 5.3 Reflecting the London-wide policy approach, Camden’s Local Plan Policy G1 seeks to direct growth towards highly accessible locations, especially within central London, and promotes the most efficient use of brownfield land and existing buildings across LB Camden.
- 5.4 Policy E1 states that the Council commits to directing new office development to the growth areas, Central London and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031. Policy E2 outlines that proposals for the intensification of employment sites and premises will be supported where they provide additional employment and other benefits. Businesses of all sizes, in particular start-ups, small and medium sized enterprises, will be supported.
- 5.5 Policy H2 specifies that the Council requires proposals for additional non-residential floorspace exceeding 200 sqm (GIA) to provide 50% of the additional floorspace as self-contained housing within the Central London Area and town centres.
- 5.6 As noted in section 2.0 of this statement, the proposed two-storey extension to Block B has already been approved at the site. The current proposals seek minor amendments to the approved scheme to further enhance the high quality, sustainable, office offer at the site. The proposals will therefore continue to be in line with Policy E1 (Economic Development) of the Local Plan and contribute to towards the Borough’s objectively assessed need for 695,000 sqm additional office floorspace to 2031 in a highly accessible Central London location.
- 5.7 Space will be available on a floorplate basis, rather than small, subdivided office accommodation, but will still be suitable for SMEs which are generally defined as businesses with less than 250 employees. The proposed development will therefore continue to be in line with the aims of Policy E2. The alterations at ground level will further improve accessibility by providing an additional access point to the building at street level, with level thresholds, further enhancing disabled access to the building. The introduction of a new corner office unit would be particularly suitable to an SME as it provides a separate self-contained access point.
- 5.8 The proposals comprise a gross floorspace gain of 694 sqm (GIA) floorspace, but given the reconfigured internal alterations will result in a corresponding floorspace loss of 494 sqm (GIA), the net floorspace uplift will therefore equate to 200 sqm (GIA). LB Camden has

confirmed in its pre-application response that the proposal would not exceed the floorspace threshold set out in Policy H2 of the Camden Local Plan and the requirement for residential provision at the site is not triggered.

- 5.9 The principle of office development at this location has already been established and the current proposals to enhance the existing offer are therefore acceptable.

Employment and Economic Benefits

- 5.10 The NPPF, London Plan and LB Camden Local Plan all support employment provision. The London Plan (Policy E1) encourages office developments to improve London's competitiveness and enhance its provision for businesses of different types and sizes.
- 5.11 The important employment and economic impact for SMEs was recognised in LB Camden's approval of the proposed development. The proposed amendments by DWS will continue to ensure economic benefits are secured and in addition will provide enhanced open space in the form of a new accessible terrace for employees which is an increasingly important benefit for companies wanting to attract employees back from home offices and into London.
- 5.12 The approved development remains consistent with the economic aims of establishes planning policy, including Policy E2 of the Local Plan and Policy E1 of the London Plan and the enhancements proposed will increase the attractiveness of the floorspace to businesses.

Design and Heritage

- 5.13 High quality design is promoted throughout national policy and guidance and the Local Plan.
- 5.14 Chapter 12 of the NPPF emphasises the importance of good design. Notably the NPPF identifies that "*good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities*" (para. 126). The NPPF specifies that, in determining planning applications, local planning authorities should aim to ensure that developments respond to local character and history whilst not preventing or discouraging appropriate innovation or change (paragraph 127). It also encourages LPAs to look for opportunities for new development within Conservation Areas and within the setting of heritage assets to "*enhance or better reveal their significance*" (para 206).
- 5.15 In line with national policy, London Plan Policy HC1 specifies that "*development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.*"
- 5.16 At a local level, Policy D1 seeks to secure high quality design and requires development to be of the "*highest architectural and urban design quality*" enhancing the character, appearance and function of the area. Policy D2 requires developments to conserve and, where appropriate, enhance the Borough's heritage assets and their settings, including listed buildings and Conservation Areas. In addition, development proposed outside of a Conservation Area that cause harm to the character or appearance of that Conservation Area will be resisted.

- 5.17 The design principles of the proposals are fully assessed in the Design and Access Statement, prepared by Squires and Partners and submitted with this application.
- 5.18 In line with both national and local policy, the proposed amendments are in keeping with the design of the approved scheme at the site and will not alter the density, scale, massing or footprint of the existing building. The proposed façade alterations will better reflect the surroundings and create a more modern, high quality appearance to the building, further enhancing the improvements that have already been secured as part of the existing planning permission.
- 5.19 The additional ground floor entrance on Fitzroy Street to create a separate unit on the junction with Howland Street and the accompanying proposed glazing/façade alterations will create an active frontage which is in character with the surrounding area. This will offer a more inviting arrival experience for occupiers and visitors, improving access for those who are less able and complementing the main access enhancements that have already been approved further to the north of Fitzroy Street. The design has carefully considered the relationships of the corner unit with existing pedestrian movements at the junction between Fitzroy Street and Howland Street. The entrance has been proposed away from the pedestrian crossing, next to the portal, avoiding any impact with the pedestrian flows.
- 5.20 The DAS accompanying the recent planning permission at the site (listed as an approved document on the decision notice) concluded that the proposals would have no direct, material impact on the surrounding Conservation Areas, nearby listed buildings to the north or the adjacent Grade II listed BT Tower. Furthermore, there would be no material effect on the London View Management Framework (LVMF) Parliament Hill Panorama View 2a as the overall height of the existing building would not be altered. Given the proposed changes to the approved scheme are small-scale in nature, these conclusions relating to heritage matters will not change.
- 5.21 In summary, the design of the proposed changes is consistent with the approved scheme and the surrounding area and will preserve the setting, character and appearance of surrounding heritage assets in line with national, regional and local policy.

Transport and Cycle Parking

- 5.22 London Plan policy T4 requires the impacts of development proposals on transport network capacity to be assessed at the local, network-wide and strategic level. LB Camden Local Plan Policy A1 echoes the London-wide approach, stating that development proposals should adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network.
- 5.23 Given the minor nature of the changes proposed, the conclusions of the previous Transport Assessment at the site will not change.
- 5.24 With regards to cycle parking, London Plan Policy T5 seeks to promote cycling across the Borough through securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well located. Local Plan Policy T1 echoes this.
- 5.25 Condition 4 of the decision notice attached to the planning permission ref. 2019/2198/P. requires the provision of 142 cycle parking spaces at the site. As noted above, following further investigation on-site, it has been identified that the layout for the cycle parking as

shown on the approved plans cannot be installed due to restricted floor to ceiling heights. It is therefore proposed to increase the size of the cycle parking area to allow the approved spaces to be provided so the 142 spaces as required by condition 4 can be met. Without these improvements the cycle parking would not be useable and would result in an under provision of spaces, which is not desirable for DWS or office tenants.

- 5.26 LB Camden's pre-application advice response specified that cycle provision at the site must comprise 142 long stay cycle parking spaces, including 5% non-standard cycle parking spaces.
- 5.27 The proposed scheme provides 143 long-stay cycle parking spaces comprising a mix of high density racks, Josta racks, Sheffield Stands and 15 cycle lockers for foldable bikes (See accompanying drawings and DAS).
- 5.28 The amendments to the approved cycle parking layout are necessary to ensure that the development complies with condition 4 of planning permission ref. 2019/2198/P and are therefore considered to be acceptable and an enhancement on the approved scheme which would be inoperable.

Energy and Sustainability

- 5.29 All new development must be assessed according to its resilience to the impacts of climate change and contribution to supporting the delivery of renewable and low carbon energy and associated infrastructure. Such matters are central to the economic, social and environmental dimensions of sustainable development (NPPF, paragraph 93).
- 5.30 Local Plan Policy CC1 states that the Council requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 5.31 All developments of more than 500 sqm GIA floorspace must submit an energy statement demonstrating how the energy hierarchy has been applied to make the fullest contribution to CO₂ reduction and a Sustainability Statement to demonstrate how climate change adaptation measures have been incorporated.
- 5.32 While there will only be a net gain of 200 sqm GIA floorspace, LB Camden confirmed in their pre-application advice response that this MMA application must be accompanied by a Sustainability Statement and Energy Strategy to be policy compliant.
- 5.33 The energy and sustainability strategy at the site is in line with what has already been approved. The accompanying Energy and Sustainability report demonstrates that the proposals follow the energy hierarchy stated by the GLA in the London Plan (and the CPG documents) - Be Lean, Be Clean and Be Green. The proposals will mitigate overheating, achieve maximal energy and water use reduction and optimise resource efficiency. The cumulative effect of implementing these design stages allows for maximal energy reduction and carbon emission savings to be achieved.

Amenity

- 5.34 Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered and would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise, daylight and sunlight.
- 5.35 The two-storey extension to Block B already has planning permission. The additional terrace proposed has been carefully sited to ensure that residential amenity is protected as it is proposed to be integrated into the approved extension for use by office tenants. Planting will be used to enhance the appearance, the exact landscaping details have not yet been determined and the applicant would accept a condition requiring details of the landscaping scheme to be submitted prior to installation and for the landscaping to be implemented prior to first use of the terrace. The biodiverse green roof is to be relocated to the roof of block C and will only be accessible for servicing purposes. Existing roof lights at Block C will be reinstated.
- 5.36 The proposed new outdoor space will enhance the employment facilities available to employees benefiting the overall employment experience and making the optimum use of land as promoted by planning policy. The terrace is within the footprint of the existing block and on the roof of the approved two storey extension. It would be set away from neighbouring property and would therefore not result in any adverse impacts with respect to overlooking or loss of privacy.
- 5.37 Waldrams has produced a new Daylight and Sunlight Report to assess whether any of the changes proposed in this MMA application will cause additional impacts on the surrounding residential properties. The updated analysis shows that the impacts of the changes proposed on the Daylight & Sunlight available to neighbouring residential properties will not exceed the minimum levels recommended within the BRE Guidelines for daylight in VSC terms and Sunlight.
- 5.38 Given the careful design of the terrace and green roof (including roof light reinstatement), the proposals will have a minimal impact on the residential amenities of these neighbouring uses. The proposals are therefore in line with Policy A1, which seeks to protect the amenity of surrounding land and buildings, with particular focus on residential uses.

Other environmental considerations

Noise and Vibration

- 5.39 Local Plan Policy A4 states that the Council will seek to ensure that noise and vibration is controlled and managed, with development required to have regard to LB Camden's Noise and Vibration Thresholds. This is supported by Policy D13 of the London Plan which seeks to reduce, manage and mitigate noise.
- 5.40 Arup has produced an addendum to the original Noise Impact Assessment at the site. This assesses the potential noise impacts that could arise from the proposed changes to the approved plant enclosure on Block A. The addendum report demonstrates that without mitigation, the noise emission from proposed external plant exceeds acceptable criteria. The proposed acoustic louvre plant enclosure (with a minimum thickness of 300mm) will

ensure that noise levels do not exceed acceptable criteria and so will not result in disturbances to local residents/occupiers.

- 5.41 The proposed roof terrace will comprise a high quality and accessible external space. It will be available to business occupiers during normal working hours and for occasional business events during evenings. Therefore, it will not result in any disturbances to surrounding properties. The addendum report also concludes that the level of noise exposure for users of the terrace is not expected to be a problem.

Water

- 5.42 Local Plan Policy CC3 seeks to ensure that flood risk is not increased by new development, with the impact of proposals in areas at risk of flooding being carefully considered. Policy CC3 also requires development to incorporate water efficiency measures, with all non-residential development expected to meet BREEM water efficiency credits.
- 5.43 The Design and Access Statement accompanying the extant permission at the site demonstrated that water demand will be reduced through the specification of more efficient fittings and installation of water meters to ensure water consumption can be monitored and managed so as to encourage reductions. The current proposals make no alterations to this.
- 5.44 In line with Local Plan Policy CC3, the proposed development will comply with BREEM water efficiency credits.

6.0 **Conclusions**

- 6.1 This Planning Statement sets out the rationale for the proposed minor material amendments to planning permission ref. 2019/2198/P approved at No. 13-17 Fitzroy Street, London, W1T 4BQ in 2020. The statement has considered the key changes proposed against the policies set out within national policy and the statutory development plan.
- 6.2 The proposed amendments are minor in nature, complement the development approved at the site and will enable DWS to provide an enhanced, high-quality office offer at the site. The changes will also facilitate the delivery of the approved cycle parking numbers required at the site and secured through condition 4.
- 6.3 The changes proposed under this application fully accord with national, regional and local planning policy and offer a number of benefits to the approved scheme at the site. We trust the Council agrees with this analysis of the planning merits of the proposals and will support this application.

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