



AUGUST 2022

# Flitcroft House, 114-116 Charing Cross Road, London, WC2H 0JR

## Planning Statement

Iceni Projects Limited on behalf of  
the E&A Property Investment  
Company Limited  
August 2022

ICENI PROJECTS LIMITED  
ON BEHALF OF THE E&A  
PROPERTY INVESTMENT  
COMPANY LIMITED

### **Iceni Projects**

London: Da Vinci House, 44 Saffron Hill, London, EC1N 8FH  
Glasgow: 177 West George Street, Glasgow, G2 2LB  
Manchester: 68 Quay Street, Manchester, M3 3EJ

t: 020 3640 8508 | w: [iceniprojects.com](https://www.iceniprojects.com) | e: [mail@iceniprojects.com](mailto:mail@iceniprojects.com)  
linkedin: [linkedin.com/company/iceni-projects](https://www.linkedin.com/company/iceni-projects) | twitter: @iceniprojects

**Flitcroft House, 114-116 Charing Cross  
Road, London, WC2H 0JR**  
PLANNING STATEMENT



---

## CONTENTS

1.	INTRODUCTION .....	1
2.	SITE CONTEXT AND PLANNING HISTORY .....	4
3.	PRE-APPLICATION ADVICE AND ENGAGEMENT .....	6
4.	PROPOSED DEVELOPMENT .....	9
5.	PLANNING POLICY .....	10
6.	PLANNING CONSIDERATIONS .....	17
7.	SUMMARY OF SUPPORTING TECHNICAL MATERIAL .....	23
8.	SUMMARY AND CONCLUSION .....	29

---

## 1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by Iceni Projects Limited (hereafter 'Iceni') on behalf of the E&A Property Investment Company Limited (hereafter the 'Applicant') in support of a full planning application at Flitcroft House, 114-116 Charing Cross Road, London, WC2H 0JR (the 'Site').
- 1.2 The site contains a five-storey Class E commercial building, with a further basement level. The ground floor is currently occupied by a restaurant and the four upper floors are multi-let to a range of office occupiers. Flitcroft House is accessed via Charing Cross Road, with the office accommodation accessed via a recessed entrance door and the restaurant accessed via its own entrance.
- 1.3 The proposals would optimise and increase the existing office accommodation on site through the refurbishment and extension of the existing building, as well as enhance the Site's contribution to the Denmark Street Conservation Area, delivering new interventions at ground floor and at roof level that would provide a betterment of the existing arrangement.
- 1.4 The Applicant is the long-term owner of Flitcroft House and is seeking to secure the long-term viable future of their asset, delivering a high-quality refurbishment of the Site to create a modern, flexible and sustainable development. Through the appointment of a high-quality team of prestigious architects and consultants, a series of proposals have been brought forward which demonstrate exemplary design and meets modern requirements in terms of energy efficiency.

### Submission Documents

---

- 1.5 The following documents and drawings (Table 1.1 and Table 1.2) have been prepared by the consultant team and are submitted in support of this planning application.

**Table 1.1 Planning Application Submission Documents**

Documents	Consultant
Planning Application Fee	The Applicant
Application Form and Ownership Certificates	Iceni Projects Limited
Covering Letter	Iceni Projects Limited
Community Infrastructure Levy Form	Iceni Projects Limited
Planning Statement	Iceni Projects Limited
Design and Access Statement	DMBA
Drawing Issue Sheet	DMBA
<b>Technical Reports</b>	
Air Quality Assessment	Air Quality Consultants

Documents	Consultant
Construction Management Plan (Draft)	RED Construction
Daylight/Sunlight Assessment	eb7 Limited
Energy and Sustainability Statement	MES Building Solutions
Fire Statement	Socotec
Heritage and Townscape Assessment	Iceni Projects
Landscaping Report	Phil Allen Design
Noise Impact Assessment	Venta Acoustics
Transport Assessment	TPP

**Table 1.2 Planning Application Drawings**

Drawing	Reference
Location Plan	0115 PL1
Existing Site Plan	0114 PL1
Proposed Site Plan	0314 PL1
Existing Basement Plan	0101 PL1
Proposed Basement Plan	0301 PL1
Existing Ground Floor Plan	0102 PL1
Proposed Ground floor plan	0302 PL1
Existing First Floor Plan	0103 PL1
Proposed First Floor Plan	0303 PL1
Existing Second Floor Plan	0104 PL1
Proposed Second Floor Plan	0304 PL1
Existing Third Floor Plan	0105 PL1
Proposed Third Floor Plan	0305 PL1
Existing Fourth Floor Plan	0106 PL1
Proposed Fourth Floor Plan	0306 PL1
Proposed Fifth Floor Plan	0307 PL1
Proposed Sixth Floor Plan	0308 PL1
Existing Roof Plan	0107 PL1
Proposed Roof plan	0309 PL1
Existing Elevation A	0110 PL1
Proposed Elevation A	0310 PL1
Existing Elevation B	0111 PL1
Proposed Elevation B	0311 PL1
Existing Elevation C	0116 PL1
Proposed Elevation C	0315 PL1

---

Drawing	Reference
Existing Elevation D	0116 PL1
Proposed Elevation D	0316 PL1
Existing Sections	0112 PL1
Proposed Sections	0312 PL1

### Structure of Planning Statement

---

1.6 The purpose of this Planning Statement is to provide the London Borough of Camden ('LBC') with details of the existing site and surroundings; the relevant planning history of the Site; details of the proposed development and a reasoned justification in the context of the local area and relevant planning policies. This Planning Statement is structured as follows:

- **Section 2** - The Site and Surroundings.
- **Section 3** - Pre-application Advice and Stakeholder Engagement.
- **Section 4** - Proposed Development.
- **Section 5** - Planning Policy.
- **Section 6** - Planning Considerations.
- **Section 7**- Summary of Supporting Technical Material.
- **Section 8** - Summary and Conclusions.

---

## 2. SITE CONTEXT AND PLANNING HISTORY

### Site Description

---

- 2.1 The Site is located on the eastern side of Charing Cross Road, at the junction with Flitcroft Street to the south. It comprises a five-storey period building, which is in commercial use, comprising a restaurant at ground floor level and commercial office use on the upper floors.
- 2.2 The Site is within the Holborn and Covent Garden ward of the London Borough of Camden. The Site is bounded to the north by a seven-storey commercial building at 120 Charing Cross Road and to the east by a three-storey commercial building at 12 Flitcroft Street. To the south, separated by Flitcroft Street, a pedestrian walkway is the Phoenix Theatre and to the west is Charing Cross Road.
- 2.3 The Site is located within the Denmark Street Conservation Area. The Site is not statutorily or locally listed, although Flitcroft House is identified as being a positive contributor to the character and appearance of the Conservation Area. There are a number of other heritage assets within close proximity to the Site with the Phoenix Theatre (to the south) and 12 Flitcroft Street (to the east) both being Grade II Listed.
- 2.4 Charing Cross Road is a street which is undergoing constant change and renewal, whilst retaining a strong heritage. Development in the area is characterised by a variety of architectural styles and buildings, which comprise a range of heights, ages and roof forms. This eclectic mix of architectural styles and buildings helps to contribute to the character of the street and the wider locality.
- 2.5 A review of the Environment Agency's Flood Map for Planning shows that the Site falls within Flood Zone 1, showing that the area has a low probability of flooding. There are no trees on the Site which are subject to Tree Preservation Orders.
- 2.6 The Site has a Public Transport Accessibility Level (PTAL) of 6B, indicating an excellent level of public transport connectivity. A bus stop is located immediately outside the Site which provides regular bus services to locations including Charing Cross, Victoria, Hampstead, Finsbury Park and Hackney, as well as suburban locations to the north and south of the city. The Site is located 0.1 miles (2 minutes' walk) from Tottenham Court Road station and 0.2 miles (5 minutes' walk) from Leicester Square Station. The central location of the Site affords it a wealth of local amenities.

### Planning History

---

- 2.7 Following a review of the LBC's online planning register, there are a small number of pertinent planning applications on the Site which are demonstrated in the table below:

---

Reference	Proposals	Status	Date
2008/3594/P	Change of use of first floor from retail use (Class A1) to office use (Class B1)	Approved	17/10/2008
2009/2673/P	Change of use of the basement and ground floors from A1 Shop use to A3 Cafe/Restaurant plus associated alterations including the installation of new shop front on Charing cross Road and Flitcroft Street frontages and plant on roof	Approved	27/07/2009

### Surrounding Planning History

- 2.8 To the south of the site, at Phoenix House, 104-110 Charing Cross Road, an application for the erection of a two storey rear extension, with a garden room and terrace at roof level to provide 2 new 2 bedroom flats, was approved in June 2017, subject to S106 Agreement, under application 2016/5190/P.
- 2.9 There are also a number of relevant planning applications on neighbouring sites. This includes the major developments on the western side of Charing Cross Road including the new Foyles Bookshop, granted planning permission in February 2014 (LPA ref. 13/09821), and Ilona Rose House, granted planning permission in August 2016 (LPA ref. 15/11234/FULL). While these two sites are located within Westminster City Council, they do demonstrate the nature of change occurring along Charing Cross Road, including increased building heights, as outlined in paragraph 2.4 above.



---

### **3. PRE-APPLICATION ADVICE AND ENGAGEMENT**

- 3.1 The Applicant and their project team have taken a proactive approach to pre-application consultation and engagement with officers at Camden Council, as well as local stakeholders. An overview of this process and outcomes is set out below.

#### **Pre-Application Consultation**

- 3.2 The Applicant has engaged in thorough and detailed pre-application discussions with Officers at LBC. One pre-application meeting was held with Officers on Site in March 2022 to discuss the proposals, along with a number of informal design workshops and discussions with officers, since the summer of 2021.
- 3.3 Throughout the pre-application process, the Applicant and project design team have engaged constructively with officers at LBC, taking on board feedback to help inform the emerging proposals.
- 3.4 The key points of discussion are summarised in the following paragraphs. A further summary is detailed within the submitted Design and Access Statement, prepared by DMB Architects.

#### **Architectural Style, Design and Materiality**

- 3.5 Pre-application discussions identified that the principle of a two-storey roof extension was acceptable, as it reflects the height of the adjacent building and the variety in building heights. The eclectic roof forms elsewhere on Flitcroft Street and Charing Cross Road are considered integral to the character of the street.
- 3.6 The proposals initially proposed that the materiality of the extension would match the painted brickwork below. LBC's Design and Conservation Officer stated that the extension should respond to the host building and that the Applicant should consider removing the paint to reveal the original brickwork, and that this should establish the materiality for the extension. The Applicant has adopted this approach, as outlined within the supporting Design and Access Statement

#### **Amenity**

- 3.7 Officers raised the potential for overshadowing to 120 Charing Cross Road, which is adjacent to the Site. It was also noted that additional storeys at the rear with windows on the side or open terraces which might give rise to overlooking of the windows at the rear of this neighbouring property would not be accepted.
- 3.8 In response to this, at the request of Officers, the layout of the roof terrace has been designed to incorporate the plant enclosure to the rear of the terrace to prevent overlooking. Furthermore, a

---

daylight and sunlight assessment has been undertaken to examine the effects on amenity of surrounding residents and provide a consideration of impacts upon neighbouring properties.

### **Transport**

- 3.9 Officers noted that the car-free proposals are policy-compliant and this should be secured by a car-free agreement within a Section 106 Agreement. A number of criteria in respect of cycle parking provision were also provided, to which the Applicant has given due consideration. The applicant is proposing a policy compliant quantum of cycle parking for both the office and restaurant uses, which will be secured within a Section 106 Agreement and further details of which are outlined in Section 6.
- 3.10 The applicant proposed the placement of 2 tables and four chairs on Flitcroft Street and additional street lighting. The Council's Transport officers advised that the existing restaurant has a licence for this and as such this should be acceptable in the future. The lighting in Flitcroft Street may also need a licence and the Applicant should seek clarification from the relevant department. Whereas this remains a future ambition for the surrounding public realm, the Applicant has not sought to capture these works within the scope of this application.
- 3.11 Officers noted that proposals would involve the refurbishment of over 1,000sqm of commercial floorspace and so it would be a major development which would trigger a number of additional criteria in terms of sustainability, although this is a point which is contested by the Applicant.
- 3.12 Sustainability Officers also noted that 'as much green roof as possible' should be provided to facilitate sustainable drainage. The applicant has subsequently sought to deliver a level of greening to the site which would exceed the prospective policy requirements of a major scheme and implement a number of measures to reduce carbon emission and promote renewable energy,

### **Statement of Community Involvement**

---

- 3.13 In addition to pre-application discussions with LBC, the Applicant has also sought to engage with nearby residents and businesses, as well as ward councillors, prior to the submission of this application.
- 3.14 The following people and organisations have been consulted about the proposals:
- Phoenix Theatre
  - Phoenix Gardens
  - 7-10 Stacey Street

- 
- 12 Flitcroft Street
  - 7-10 Stacey Street
  - 120 Charing Cross Road
  - Bloomsbury Conservation Area Advisory Committee

3.15 The applicant undertook a meeting with the Phoenix Theatre on 5<sup>th</sup> July 2022. Consultation letters were distributed to all properties and groups listed above on 14<sup>th</sup> July 2022, with the Conservation Area Advisory Committee notified by email. No responses have been received at the time of the submission of this application.

---

## 4. PROPOSED DEVELOPMENT

- 4.1 This section sets out the details of the proposed development. Below is the description of development for which we are requesting planning permission:

*“The comprehensive refurbishment and upward extension of Flitcroft House, delivering two new floors of office accommodation, a roof terrace, alterations to the ground floor and other associated works”*

### **Proposed Development**

---

- 4.2 The proposed development would refurbish the existing office floorspace and provide an additional two storeys to the existing building, to provide an increase of 479 sqm GIA of Class E office accommodation. This would allow for an overall quantum of 1,811.1sqm of Class E accommodation across the Site.
- 4.3 Additionally, the application proposes a terrace at roof level to provide additional amenity space for the office building, with 105.2sqm of landscaped amenity space. The Applicant is also seeking permission for the erection of new plant enclosure at roof level, with new air handling units and condensers to serve the refurbished office accommodation. A small quantum of external terracing is also proposed at sixth floor level.
- 4.4 At ground floor level, this application proposes the reconfiguration and redesign of the current façade, to provide a new entrance to the ground floor restaurant and a new facade to the ground floor elevation onto Charing Cross Road. This would feature full height arched openings of the same spacing as the windows above.
- 4.5 In line with pre-application advice, the paint would be removed from the brickwork on upper floors and the materiality of the extension has been designed to complement the original red brickwork. The Design and Access Statement prepared by DMBA Architects provides more detailed information on the approach to materiality and design.
- 4.6 This application also proposes a number of public realm improvements to bring wider benefits to Flitcroft Street. This includes the activation of the street, through the retention of the existing permission for the usage of tables and chairs on the pavement and new street lighting.
- 4.7 To support the high quality, refurbished office space, the Applicant also proposes the provision of cycle parking at basement level for both the office use and restaurant use, of which none is present on site. Further information is included within the supporting Transport Assessment.

---

## 5. PLANNING POLICY

### Introduction

---

- 5.1 This section outlines the planning policy considerations which have informed the development proposals, and which provide the context for the consideration of the proposed scheme.

### The Development Plan

---

- 5.2 The UK Planning System has a plan-led approach. Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets the context for the determination of planning applications:

***“If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.***

- 5.3 The suitability of the proposed development will be guided by the policies in the following documents:

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

#### Camden Local Plan (2017)

- 5.4 Policy G1 ‘Delivery and location of Growth’ outlines that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings by, amongst other measures, supporting development that makes best use of its site. Growth in Camden will be expected to help contribute towards achieving the provision of 695,000sqm of office floorspace and that the most significant growth will take place in growth areas, highly accessible locations including Central London.

- 5.5 Policy D1 ‘Design’ outlines that the Council expects excellence in architecture and design and has a commitment to securing development which is of a high quality design, with proposals required, *inter alia*, to:

- Respects local character and context;
- Preserves or enhances the historic environment and heritage assets;
- Incorporates sustainable design;

- 
- Comprises details and materials that are of high quality and complement the local character; and
  - Integrates well with the surrounding streets and open spaces
- 5.6 Policy D2 'Heritage' demonstrates that the Council will ensure that heritage assets, including Conservation Areas, will be protected and enhanced and that development proposals within Conservation Areas will be closely scrutinised to ensure that the character of the Conservation Area is maintained and respected. Such applications will be required to provide supporting documents, including Heritage Statements.
- 5.7 Policy E1 'Economic Development' outlines that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth through, *inter alia*, 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.
- 5.8 Policy C5 'Safety and Security' states that the Council will require developments to consider measures to enhance safety within the borough, including incorporating design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn and Covent Garden
- 5.9 Policy CC1 'Climate change mitigation' promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy. A minimum of 20% reduction in carbon emissions delivered through on site renewable energy generation should be achieved.
- 5.10 Policy CC2 'Adapting to climate change' states that the Council will require development to be resilient to climate change and that all development should adopt appropriate climate change adaptation measures.
- 5.11 Policy CC4 'Air Quality' requires new developments to consider the impact on air quality and ensure it is mitigated, as well as taking 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.
- 5.12 Policy C6 'Access for all' states that the Council will expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.

- 
- 5.13 Policy H2 'Maximising the supply of self-contained housing from mixed-use schemes' outlines that 50% of all new or net additional floorspace within the Central London area of the borough is expected to be delivered as residential floorspace. The trigger for this policy occurs when 200 sqm GIA of net additional floorspace is provided. Where this cannot practically be applied, or housing would more appropriately be provided off-site, they will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.
- 5.14 Policy A1 'Managing the impact of Development' sets out that the Council will ensure that the quality of amenity of residents near to new development is protected, with a focus on loss of outlook, privacy, overshadowing and noise, as well as managing Construction Phase impacts.
- 5.15 Policy A4 'Noise and Vibration' outlines that the Council will control and manage noise levels, by ensuring that developments have regard to Camden's Noise and Vibration Thresholds and that developments creating unacceptable impacts or any noise-sensitive developments without appropriate attenuation will not be permitted.
- 5.16 Policy T1 'Prioritising walking, cycling and public transport' outlines how the Council will promote sustainable transport through the development process, including:
- **Walking** – through ensuring that developments are supported by high quality public realm improvements, which are permeable and adequately lit;
  - **Cycling** – through provision of policy compliant levels of secured on-site cycle parking
- 5.17 Policy T2 'Parking and car free development' sets out that new developments in the borough should be car free.
- 5.18 Policy T3 'Transport Infrastructure' states that the Council will seek improvements to the transport infrastructure within the borough.

#### **London Plan (2021)**

- 5.19 Policy GG2 'Making the best use of land' identifies that those involved in planning and development must enable the development of brownfield land, including utilising small sites.
- 5.20 Policy E1 'Offices' states that improvements to the quality, flexibility and adaptability of office space should be supported by new office provision, refurbishment and mixed-use development.
- 5.21 Policy SD4 'The Central Activities Zone (CAZ)' states that the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the

---

intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.

- 5.22 Policy SD5 'Offices, other strategic functions and residential development in the CAZ' states that offices and other strategic functions are to be prioritised within the CAZ.
- 5.23 Policy D3 'Optimising site capacity through the design-led approach' identifies that all development must make the best use of land by following a design-led approach which optimises the site's capacity. Proposals should respond to local distinctiveness through their layout and encourage active travel with conveniently placed pedestrian and cycle accesses and routes. Environments should be safe, secure, and inclusive and provide appropriate amenity and green space for all.
- 5.24 Policy G5 'Urban greening' sets out that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of the site and building design. The Mayor has set a target score for commercial development of 0.3.
- 5.25 Policy SI1 'Improving Air Quality' requires, *inter alia*, new development to be Air Quality Neutral and not create an unacceptably risk of high levels of exposure to poor air quality.
- 5.26 Policy T5 'Cycling' sets out the cycle parking standards for London, making clear that development proposals should help remove barriers to cycling. The policy sets out the following cycle parking standards for office developments. The Site is located within an area which is subject to higher minimum cycle parking requirements:
- Long stay – 1 space per 75m<sup>2</sup>
  - Short-stay – 1 space per 500m<sup>2</sup> for the first 5000m<sup>2</sup> and 1 space per 5,000m<sup>2</sup> thereafter
- 5.27 Policy T6 'Parking' sets out the car parking standards for London, making clear that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. In accordance with the maximum parking standards outlined within Table 10.4 of Policy T6.2, all office developments within the Central Activities Zone should be car free.

### **Supplementary Planning Guidance Documents**

---

#### **Camden Planning Guidance (PG) Documents**

- **Access for All CPG (2019)**
- **Amenity CPG (2021)**
- **Design CPG (2021)**



- 
- **Developer Contributions CPG (2019)**
  - **Energy Efficiency and Adaptation CPG (2021)**
  - **Planning for Health and Wellbeing CPG (2021)**
  - **Transport CPG (2021)**

#### **Other Guidance**

- 5.28 Denmark Street Conservation Area Appraisal and Management Strategy (2010)

#### **Material Considerations**

---

- 5.29 The supporting documents set out below represent material considerations in considering the suitability of the proposed development:

- National Planning Policy Framework (2021) (NPPF).
- National Planning Practice Guidance (March 2012).

#### **National Planning Policy Framework (2021)**

- 5.30 The NPPF was amended in July 2021 and sets out the government's planning policies for England and how these are expected to be applied. The NPPF focuses specifically upon the delivery of sustainable development. It must be taken into account in the preparation of local and neighbouring plans and is a material consideration in planning decisions.
- 5.31 Sustainable Development - Paragraph 8 of the NPPF specifically sets out the basis for the achievement of sustainable development in planning terms and defines three key objectives in the planning system:

- an economic objective – to encourage a strong & competitive economy, by making sure that the right type of land is available in the right places to support growth and improved productivity, as well as coordinating the provision of infrastructure.
- a social objective – to support strong, vibrant, and healthy communities, by making sure that a sufficient number and range of homes can be provided.
- an environmental objective – to contribute to protecting and enhancing our natural, built, and historic environment, including making effective use of land.

- 
- 5.32 Paragraph 10 and 11 make clear that the presumption in favour of sustainable development is at the heart of the NPPF and that development proposals that accord with an up-to-date development plan should be approved without delay.
- 5.33 Building a strong and competitive economy - Paragraph 81 states that planning decisions should help create the conditions in which businesses can invest, expand and adapt, with significant weight placed on the need to support economic growth and productivity. This is particularly salient within areas of high economic productivity.
- 5.34 Promoting sustainable transport - Paragraph 104 states that transport issues should be considered from the earliest stages of development proposals. Applications for development should: give priority first to pedestrian and cycle movements; address the needs of people with disabilities and reduced mobility; create places that are safe, secure, and attractive; allow for the efficient delivery of goods & access by service and emergency vehicles; and be designed to enable charging of plug-in and other ultra-low emission vehicles.
- 5.35 Achieving well-designed places - The creation of high-quality buildings and places is discussed in paragraph 126. Good design is fundamental to what the planning process should achieve and is a key aspect of sustainable development. Being clear about design expectations is essential for achieving this. Planning decisions should ensure that developments:
- Will function well and add to the overall quality of the area, over the lifetime of the development.
  - Are visually attractive as a result of good architecture, layout, and appropriate landscaping.
  - 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).
  - 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.
  - 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.
  - 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.
- 5.36 Meeting the challenge of climate change, flooding and coastal change - New development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate
-

---

change. Proposals should also help to reduce greenhouse gas emissions, such as through its location, orientation, and design. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. Advice from the lead local flood authority should be taken into account.

---

## 6. PLANNING CONSIDERATIONS

- 6.1 This section of the statement sets out the key planning considerations arising from the proposals, setting out a reasoned justification for the development in the context of the adopted Development Plan and relevant planning policy.

### Principle of Development

---

- 6.2 The Site contains an existing Class E commercial building which is located within the Central Activities Zone (CAZ). The refurbishment and subsequent expansion of existing office floorspace on the site is therefore compatible with this designation and the prevailing character of the area. These proposals would bring substantial benefits which should be supported by local, regional, and national policy.

- 6.3 Para 8 of the NPPF defines the parameters for considering new development, for which sustainability is the driving force. The key considerations in relation to addressing these parameters include the following objectives:

- **An economic objective** - the proposed development would deliver new office floorspace into an established commercial area, therefore providing compatible and appropriate development to the right place at the right time which would help to build and support a strong and competitive local economy. The enhancement and activation of Flitcroft Street would also provide wider commercial benefits to the surrounding area through the creation of a more attractive and secure public realm.
- **A social objective** - the proposed development seeks to increase the quantum and quality of the existing Class E office floorspace, as well as enhance the ground floor unit which is currently occupied by a Mexican restaurant. It also seeks to create a well-designed, beautiful and accessible building through a considered design process, therefore addressing the social objectives of the NPPF.
- **An environmental objective** – the proposed development makes the most effective use of the land through the upwards extension of the building, whilst respecting the surrounding Conservation Area and Heritage assets. Furthermore, the development would also provide attractive private outdoor space at roof level with green roof incorporated, all of which would contribute to sustainable drainage, biodiversity and urban greening.

- 6.4 The assessment above shows that the proposed development would meet the objectives of sustainable development as set out in the NPPF. The benefits of the proposed development set out above should be taken on board and considered in the planning balance alongside the policy

---

justification set out in each section below. Doing so will demonstrate that the proposed development is a sustainable scheme which delivers on the ambitions set out by the Council for redevelopment within the borough, and as such the principle of the scheme should be viewed favourably.

## **Land Use**

---

### **Creation of new office floorspace**

- 6.5 Policy E1(f) of the Camden Local Plan (2017) states that new office development be directed towards Central London in order to meet the forecasted demand of 695,000sqm of office floorspace between 2014 and 2031. London Plan Policy E1(a) states that improvements to the quality, flexibility and adaptability of office space should be supported by new office provision, refurbishment and mixed-use development.
- 6.6 Given the limited quantum of available land in the borough, to deliver this level of growth Local Plan policy G1 requires new developments to make the most efficient use of sites. This is similarly reflected within policy GG2 of the London Plan. Through the refurbishment and expansion of the existing office accommodation, this scheme proposes an additional 479 sqm GIA of Class E office accommodation to create 1,811.1m<sup>2</sup> of Class E accommodation across the Site. The Site is in open Class E use and despite a small reduction in area of the restaurant, an active commercial frontage would still be provided.
- 6.7 The supporting text for Policy G1 states that supporting enterprise and the provision of employment by providing or retaining suitable premises to support businesses to stay or expand within Camden is one of the key objectives of this policy. High quality modern office floorspace with amenity space at roof level would help to deliver this ambition as well as stimulate future economic growth, which aligns with Paragraph 8a of the NPPF (2021).
- 6.8 Policies SD4 and SD5 of the London Plan (2021) relate to suitable development and the protection of office functions within London's Central Activities Zone. This application seeks to enhance the office floorspace of the site which is in Class E office use on the upper floors and complies with these objectives.
- 6.9 Overall, it has been demonstrated that the refurbishment and provision of additional office floorspace on this site complies fully with all Local Plan, London Plan and National Planning Policy Framework policies and should be supported.

### **Residential and Mixed-Use Development**

- 6.10 Camden has an identified need for new housing, with adopted policy aiming to exceed a target of 16,800 additional homes between 2016 and 2031. As such, Policy H2 in the Camden Local Plan

---

(2017) seeks to secure the inclusion of self-contained homes as part of a mix of uses, where non-residential development is proposed.

- 6.11 Furthermore, in the Central London Area, where development proposes additional floorspace of more than 200sqm (GIA), policy H2 outlines that the Council will seek 50% of all additional floorspace to be provided as self-contained housing, although it is noted that this is “particularly where 1,000 sqm (GIA) or more of additional floorspace is proposed”. This application proposes the net provision of 434sqm new class E floorspace, indicating a policy requirement for the Applicant to provide 217sqm of residential floorspace. However, this is subject to considerations such as compatibility with other uses on site, the size of the Site and any wider constraints and it is argued that the minor uplift in floorspace justifies a financial contribution in lieu as being policy-compliant.
- 6.12 Paragraph 3.48 pursuant to Policy H2 of the Local Plan outlines examples of proposals that would not be required to provide housing. These include where they would be unable to create an acceptable level of residential amenity and would involve an extension to an existing building, especially a building that makes a positive contribution to a conservation area, that cannot accommodate new features necessary to support housing, such as entrances, windows, staircases and lifts.
- 6.13 In practical terms, delivering residential units on Site would be prejudicial to the optimisation of the building as a commercial development. It would require a separate entrance and core, as well as amenities such as a separate bin and bike stores. As the building is being retained, this would be impractical and have a major impact on the flexibility and functionality of this building and require significant material alterations to a building noted as a positive contributor to the Denmark Street Conservation Area. Furthermore, it would greatly reduce the ultimate quantum of deliverable residential floorspace through these internal alterations. Therefore, it would result in conflict with the predominant use of the building for commercial purposes.
- 6.14 Furthermore, notwithstanding the above policy position which allows for a financial contribution in lieu of on-site provision for smaller schemes, the owners do not own any other properties in the locality that could be a donor site. Therefore, it would be impractical to seek delivery of this floorspace on an alternative site. A fully compliant contribution shall be made, which would allow the Council to help fund other affordable housing projects within the local area, thus having a greater overall planning benefit.
- 6.15 Lastly, the provision of on-site residential accommodation would conflict with policy SD5 of the London Plan, which requires offices and other strategic functions to be prioritised within the CAZ. Furthermore, the site is located within a constrained area of Central London with few viable development sites whereby this floorspace could be provided off-site. Therefore, an off-site contribution should be provided via a Section 106 agreement.

- 
- 6.16 Overall, this scheme has been demonstrated to be compliant with policy H2 of the Camden Local Plan, policy SD5 of the London Plan and the Housing CPG and should be approved.

## **Design and Heritage**

---

### **Urban Design**

- 6.17 Paragraph 126 of the NPPF attaches great importance to achieving well-designed places. Policy D1 of the Local Plan and Policy D4 of the London Plan require development to be of a high quality of design and architecture, with Chapter 2 of the Camden Design CPG outlining the need for development to consider the surrounding development context, the existing built form and materiality.
- 6.18 The proposed development comprises the addition of two additional storeys to the existing building, to provide an overall height of 27.1 metres. This would reflect the height of the adjoining building to the north at 120 Charing Cross Road and provide more continuity in built form on this part of Charing Cross Road. Whereas the prevailing heights and roof forms along other parts of Charing Cross Road are varied, Officers have noted in pre-application discussions that they consider this to be integral to the character of the street and therefore the scale of the proposed development should be considered acceptable.
- 6.19 The recommendation from Officers in the pre-application meeting to taper the additional storeys has been considered but is not a practical design outcome, as clarified within the Design and Access Statement. Nevertheless, the proposed design seeks provide a slightly recessive element to the roof extension, which reflects the variation in style between the punched arch openings proposed to the additional storeys, a distinction which would be further reinforced by the enhancement of the cornice to crown the existing façade. The resulting development would respond acceptably to the existing hierarchy of the existing built form.



Figure 1

- 
- 6.20** At ground floor level, the façade will be redressed sensitively, particularly along the Charing Cross Road elevation, to restore some of the original design features. The proposed design of the building would ensure that optimal levels of accessibility to the refurbished building will be provided, in line with policy C6 of the Camden Local Plan and the Access for All CPG.
- 6.21 In considering the existing built form, Officers indicated during pre-application discussions that the paint should be removed from the brickwork on the upper levels to inform the extension, instead of proposing render to the additional storeys to match the existing materiality. The Denmark Street Conservation Area Appraisal notes that there is a ‘handsome’ red brick and stone frame between 112 and 136 Charing Cross Road which makes a strong contribution to the Conservation Area. Accordingly, the original paintwork on the upper floors would be stripped back and the original red brick facade restored. The roof extension would be comprised of deep red-coloured brickwork to match the lower elevations, as demonstrated on **Figure 1** above.
- 6.22 Policy D1(k) and (l) state that developments which propose good quality landscaping and external amenity space should be supported and policy C5 requires developments to incorporate design principles which contribute to community safety and security. This application seeks to further activate Flitcroft Street, through the provision of street furniture and additional street lighting, to create an accessible, secure and well-lit destination which builds on the existing pavement license to provide tables and seating outside the ground floor commercial unit.

### **Heritage**

- 6.23 Policy D2 of the Camden Local Plan requires the Council to ensure that the protection and enhancement of Conservation Areas is maintained during the development process. The design of the upwards extension has been considered carefully in line with the advice of Council’s Heritage and Conservation Officer. As outlined above, the material changes to the façade and the materiality of the roof extension have been designed to respect the character of both the Denmark Street Conservation Area and the development site, which is a positive contributor to the character and appearance of the Conservation Area. The supporting Heritage and Townscape Assessment also outlines that the proposals would provide a high-quality addition to the area, which would enhance the visual interest and experience of the surrounding townscape.
- 6.24 Additionally, there are a number of Grade II Listed heritage assets in close proximity to the Site. As outlined within the supporting Heritage and Townscape Statement, the proposals would make a complementary addition to and within the setting of such assets, which include the Phoenix Theatre and 12 Flitcroft Street and the impact should therefore be considered acceptable.
- 6.25 Overall, the proposed design is in accordance with policies C5, D1 and D2 of the Camden Local Plan, policy D6 of the London Plan, the Denmark Street Conservation Area Appraisal and Management Strategy and the NPPF and should be approved.



---

## **Amenity**

---

- 6.26 Policy A1 of Camden's Local Plan seeks to ensure that the amenity of neighbouring properties is protected, particularly with regard to visual privacy, outlook, sunlight, daylight and overshadowing. Policy A4 of the Local Plan and Policy D14 of the London Plan seeks to ensure that noise and vibration levels resulting from new development are acceptable.
- 6.27 The additional storeys do not propose fenestration to the side or rear. Furthermore, the terrace is proposed to the front of the roof, with the plant enclosure proposed to the rear, which faces onto other properties to the north of the Site. As such, there is no loss of privacy to the occupants of 120 Charing Cross Road and there are no habitable rooms on the adjacent 12 Flitcroft Street or above the Phoenix Theatre opposite which would be impacted by these proposals.
- 6.28 In respect of loss of light and outlook, the Applicant has submitted a Daylight and Sunlight Assessment in support of this application, which demonstrates that the levels of daylight and sunlight to neighbouring properties with potentially sensitive fenestration, notably 109 Charing Cross and 9, 10 and 11 Denmark Street are fully compliant with BRE guidelines. The proposed development is a commercial scheme and therefore the daylight and sunlight levels have not been tested
- 6.29 In respect of noise, the Applicant has submitted an Acoustic Report in supporting of this application, which demonstrates that there would be no detrimental impact to any nearby occupiers as a result of the introduction of a new plant room. Whereas levels of noise emanating from the roof terrace use may be a concern, given the surrounding context, the impact on neighbouring amenity should be minimal.
- 6.30 Overall, the impact on neighbouring amenity should be considered acceptable and, as such, the application is in accordance with Policies A1 and A4 of the Camden Local Plan and Policy D14 of the London Plan and should be approved.

## **Parking and Transport**

---

### **Car Parking**

- 6.31 Policy T1 of the Camden Local Plan requires new developments to focus on the promotion of sustainable transport, including walking and cycling and a move towards car free development. Meanwhile, Policy T2 of the Camden Local Plan sets out that new developments in the borough should be car free. This aligns with London Plan policy T6(b) which states that "car-free" development should be the starting point for all development proposals in places that are well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). This accords with the priorities of the Transport CPG.

- 
- 6.32 The proposed development aligns with Table 10.4 within the London Plan which sets out the maximum office parking standards and states that proposals for office development within the CAZ and inner London should be car free. The supporting text to Policy T6.5 outlines that disabled parking should be provided even where developments are car free, although there is no scope to provide on-site or on-street parking and therefore as agreed within pre-application discussions, none is proposed.

#### **Cycle Parking**

- 6.33 Table 10.2 under Policy T5 of the London Plan outlines the requirements for office schemes in areas with higher cycle parking standards to provide 1 space per 75 sqm for long-stay users and for long stay users 1 space per 500 sqm for the first 5000sqm of floorspace. For A3 (Class E restaurant use), there is a policy requirement to provide 1 space per 175sqm of floorspace for long stay users and 1 space per 20sqm for short stay users
- 6.34 The scheme proposes to provide 20 long-stay cycle spaces for the office use and 4 long-stay cycle parking spaces for the restaurant use at basement level. These would be marked out separately as outlined on plan basement layout plan 0301. Short stay parking will be provided off site and would be secured through a Section 106 Agreement. End of journey facilities are provided, also at basement level. This level of provision is in line with the minimum cycle parking requirements within the London Plan.
- 6.35 Further details on parking provision are included in the Transport Assessment prepared by Iceni Transport which accompanies this submission.

#### **Servicing and Deliveries**

- 6.36 Camden Local Plan Policy A1 and Section 4 of the Transport CPG outline the requirements for a Delivery and Servicing Plan to manage and mitigate the potential impacts of deliveries and servicing on the amenity and safety of the general public.
- 6.37 An outline servicing strategy is included within the Transport Assessment in support of the application, to demonstrate that the impacts upon local amenity as a result of deliveries and servicing utilising existing arrangements would be acceptable..

#### **Energy and Sustainability**

---

- 6.38 In November 2019, Camden Council formally declared a Climate and Ecological Emergency, and committed to work towards making Camden *net zero* carbon by 2030. The Applicant and their Design Team has taken great care to create a high-quality scheme with sustainability at its core.

- 
- 6.39** Policy CC1(d) of the Local Plan states that the Council will support the implementation of energy saving measures to reduce emissions and minimise the effects of climate change. The applicant proposes the application of 13 PV panels at roof level to the roof of the plan enclosure, which total approximately 170sqm, to maximise the development's renewable energy generation capability.
- 6.40** The supporting Energy and Sustainability Statement outlines that through passive design and the energy efficiency measures proposed, the scheme would demonstrate a 20% carbon emissions reduction against Part L Building Regulations with renewable energy technologies providing an additional 22% carbon reduction against Part L Building Regulations. These measures combined provide a carbon dioxide emission saving of 42% compared to the Part L:2013 Building Regulations which exceeds the minimum requirement of 20% as set within the supporting text to Policy CC1 of the Camden Local Plan and Table 2b of the Energy Efficiency and Adaptation CPG.
- 6.41** Furthermore, one of the key benefits of the proposals is the retention and extension of the existing building, rather than a complete redevelopment. This would ensure the embodied carbon in the building would be retained and the building fabric enhanced to achieve a more energy efficient, sustainable building. Retaining and refurbishing the building would also see issues associated with construction management minimised
- 6.42** Overall, the proposed development demonstrates that through energy efficient plant, design and energy efficiency measures, it would deliver a high-quality scheme with sustainability and energy efficiency at its core. It would adhere with the Energy Hierarchy and deliver on the energy efficiency and climate change mitigation policy requirements of policy CC1 and policy CC2 within the Camden Local Plan and the Energy Efficiency and Adaptation CPG

#### **Other matters**

---

##### **Drainage and Flood Risk**

- 6.43** Policy CC3 of the Camden Local Plan requires proposals to consider the impact of development in areas at risk of flooding and should utilise Sustainable Drainage Systems (SuDS)
- 6.44** The Site is within Flood Zone 1 and is not a major scheme, therefore there is no requirement for the submission of a Flood Risk and Drainage Assessment. Sustainable

##### **Landscaping and Urban Greening**

- 6.45** Policy CC2 of the Camden Local Plan requires development proposals to be resilient to climate change through adoption of measures such as biodiverse roofs, combination green and blue roofs and green walls where appropriate. Policy G5 of the London Plan provides a more robust policy basis, requiring new commercial development to meet a target Urban Greening Factor (UGF) score of 0.3.

---

6.46 Whereas this is a requirement primarily for new major development, the Applicant understands the significance of ensuring that the proposed development achieves a high standard of sustainability and would contribute to the Council's Net Zero and Climate Change objectives, which are fully supported.

6.47 As such, the supporting Energy and Sustainability and Landscaping reports demonstrate that through measures such as the provision of a green roof and planting at roof terrace level, these proposals would achieve an Urban Greening Factor score of 0.4, which would exceed the Local Plan target.

#### **Air Quality**

6.48 The Council has declared a borough-wide Air Quality Management Area, for exceedances of the annual mean nitrogen dioxide and 24-hour mean PM<sub>10</sub> objectives. As such, consideration should be given both to the impact of exposure to such pollutants upon the occupants of the proposed development, as well as the impacts of the development itself, in line with policy CC4 of the Camden Local Plan. Policy SI2 of the London Plan also states that new development should be at least Air Quality Neutral.

6.49 The supporting Air Quality Assessment outlines that the air quality in the area surrounding the Site is acceptable. Furthermore, it is stated that there would be no further emissions from the refurbished building, or from vehicles as there is no provision for car parking.

6.50 Overall, the extant air quality would not unduly impact upon future users of the Site and the development would be considered to be Air Quality Neutral in terms of transport emissions and better than Air Quality Neutral in terms of building emissions. Therefore, the proposals would comply with all relevant policies within the Development Plan.

---

## 7. SUMMARY OF SUPPORTING TECHNICAL MATERIAL

- 7.1 Our client acknowledges the Council's validation requirements with regards to proposals of this nature. The planning and technical assessment documents that have been submitted as part of the detailed planning application for the redevelopment of the Site are set out in this Section.

### **Draft Construction Management Plan**

---

- 7.2 A draft Construction Management Plan prepared by RED Construction has been submitted part of this application.
- 7.3 This draft Management Plan provides an outline of how initial matters such as construction access would be addressed, to satisfy the initial concerns raised by the Council's Planning and Highways officers at this stage. A full CMP would be secured by condition.

### **Air Quality Assessment**

---

- 7.4 With regards to Air Quality, a full assessment provided by Air Quality Consultants has been submitted in support of this application.
- 7.5 Sections 4 and 5 of the submitted document outline that the proposed development would comply with the GLA Air Quality Neutral Guidance for all new development in London to at least achieve Air Quality Neutral status.

### **Noise Impact Assessment**

---

- 7.6 A Noise Impact Assessment for the proposed plant unit, prepared by Venta Acoustics has been submitted as part of this application. It recommends that the noise impacts of the plant unit at roof level would be acceptable.
- 7.7 Further details can be found within the submitted Acoustic Assessment

### **Daylight/Sunlight Assessment**

---

- 7.8 A Daylight and Sunlight Assessment has been prepared by eb7 and submitted as part of this application. This assessment has analysed the effects of the proposed development on neighbouring properties and their access to daylight and sunlight. The report concludes that there would be no adverse impact neighbouring properties and gardens in terms of daylight, and that the proposals are compliant with BRE guidance in relation to sunlight impacts.

- 
- 7.9 It can be concluded therefore that the proposal is acceptable in terms of daylight and sunlight. Further information can be found within the submitted report.

### **Heritage and Townscape Assessment**

---

- 7.10 A Heritage and Townscape Assessment prepared by Icen Projects has been submitted alongside this application.
- 7.11 The assessment concludes that the height, scale and design of the development would be in keeping with the character of the surrounding townscape and enhance the Site within the context of Charing Cross Road, Flitcroft Street and the wider Conservation Area. Furthermore, the improved architectural quality of the Site, alongside its improved engagement with the surrounding historic street pattern is considered to increase the positive contribution of the Site to the settings of the adjacent heritage assets.
- 7.12 Therefore, it is considered to comply with all Local and London Plan Guidance and the wider Good Practice in Planning Guidance from Historic England.

### **Energy and Sustainability Statement**

---

- 7.13 An Energy and Sustainability Statement prepared by MES Building Solutions which highlights and addresses regional, national, and local planning policies relating to energy and sustainability.
- 7.14 The report highlights the proposed energy infrastructure of the development, which utilises a number of sustainable methods, including PV technology. The energy hierarchy is used to demonstrate the reduction in energy and CO2 emissions from the development.
- 7.15 The report also demonstrates how the development achieves a 42% reduction in CO2 emissions when compared with Part L 2013 compliant baseline model, in line with the Camden Local Plan and London Plan Policy.
- 7.16 Further information is detailed within the submitted statement.

### **Transport Assessment**

---

- 7.17 TPP have prepared a Transport Statement which provides full details of the transport strategy for the Site, including the provision of cycle parking which was raised by officer in pre-application discussions. It also clarifies that maintaining current delivery and servicing arrangements would be acceptable in principle.

- 
- 7.18 It is concluded that the proposals are compliant with all relevant national and local transport policies and would contribute towards the promotion of sustainable transport whilst not putting unnecessary stress on the local highways network. Further details can be found within submitted report.

#### **Fire Statement**

---

- 7.19 Socotec have prepared a Fire Statement which provides full details of the Fire strategy for the Site. This accords with the requirements of Policy D12 of the London Plan.

---

## 8. SUMMARY AND CONCLUSION

- 8.1 This Planning Statement has been prepared on behalf of Estates and Agency Group in support of a full planning application at Flitcroft House, 114-116 Charing Cross Road, London.
- 8.2 Overall, the development proposals would help to meet a number of Camden's planning policies and targets, by refurbishing an existing office site whilst also delivering a significant quantum of new office floorspace. The proposals would bring a significant number of benefits to the Site and the local area, and an overview of these is provided below.

### **Economic Benefits**

---

#### **Enhancement and uplift of existing office floorspace**

- 8.3 The proposals would allow for the modernisation of existing office floorspace which is dated and of limited quality and would benefit from being enhanced to meet the contemporary commercial requirements in the post-COVID market. Furthermore, through the upwards extension of the building, the scheme would deliver an uplift of 479sqm of office floorspace, a net increase of 434sqm of Class E floorspace across the Site, which would provide two further storeys of high-quality commercial office space within an established commercial area. This aligns with the land use principles of the Central Activities Zone as well as adopted Local Plan and London Plan policies pertaining to the refurbishment and extension of offices.
- 8.4 Furthermore, one noticeable element of the shift in the central London office market following the pandemic relates to the desire for ancillary amenity space for commercial units which has become increasingly popular as commercial tenants seek to attract staff back into the office. As such, the provision of a new high-quality roof terrace for users of the refurbished office floorspace would provide an additional incentive to future commercial tenants. Therefore, this scheme would provide compatible and appropriate development to the right place at the right time, contributing towards building and supporting a strong and competitive local economy and helping the city to recover following the pandemic by attracting footfall back into central London.

#### **Local jobs and Employment**

- 8.5 The retention of the ground floor commercial unit, albeit with a reduced floorspace, would nevertheless ensure that the site does not lead to a net loss of jobs within the borough. The redevelopment of the Site would also allow for the employment of local construction workers and businesses for the construction phase.



---

## **Social Benefits**

---

### **Benefits of high-quality office space**

- 8.6 The provision of high-quality office floorspace with ancillary rooftop amenity space within the CAZ would contribute towards the strengthening of the office market and the wider economy of the city, attracting companies and their staff back into central London. The creation of an attractive office environment and socialising space, thus providing the opportunities for staff to interact and socialise would have a significant social benefit to future users, as well as surrounding businesses which support office footfall.

### **Ground floor commercial use**

- 8.7 Whereas there would be some loss of Class E(b) floorspace within this refurbishment, the retention of a commercial unit at ground floor level would ensure the provision of a restaurant amenity which contributed to the vitality of the surrounding area and aligns with policy SD4 and SD5 of the London Plan.

### **High Quality Design**

- 8.8 The Applicant has engaged continuously with officers at the Council on matters relating to design, heritage and conservation. As such, the proposed development achieves a high quality of design which respects the character of the surrounding area, aligning with policies D1 and D2 of the Camden Local Plan and policy D6 of the London Plan.

## **Environmental Benefits**

---

### **High Sustainability credentials**

- 8.9 The redevelopment of the site would significantly increase the level of greening across the site. The proposals would achieve an Urban Greening Factor score of 0.4 through the significant landscaping at rooftop level, which would exceed adopted policy requirements and demonstrate significant environmental benefits. Furthermore, the scheme would exceed the Council's adopted policy criterion relating to carbon reduction. Overall, the proposed development would secure a long-term sustainable future for the building.

### **Encourages active travel and use of public transport**

- 8.10 The proposals are car free and would include policy compliant levels of cycle parking. The site is also in a highly sustainable city centre location adjacent to a main bus route and in close proximity to the London Underground which would encourage future users of the Site to use sustainable methods of transport.

---

## **Overall Conclusion**

---

- 8.11 The proposed development submitted for approval as part of this application has the potential to deliver the provision of high quality new and refurbished Class E office floorspace within the London Borough of Camden and the Central Activities Zone. The proposals have the potential to provide a wide range of benefits, which meet the economic, social, and environmental objectives set out in the NPPF for achieving sustainable development.

On this basis, it is considered that the proposals help to achieve Camden's local planning policy objectives of delivering high quality office floorspace and new amenity space within the borough and should be approved.