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Dear Lewis

2021/3431/PRE – Flitcroft House, 114-116 Charing Cross Road, WC2H 0JR

I refer to your pre-planning application enquiry 2021/3431/PRE – Flitcroft House, 114-116 Charing Cross Road, WC2H 0JR. Thank you for sending the existing and proposed drawings and the pre-application pack. Thank you also for organising the site visit and the subsequent online meeting.

Site description

The site is located on the east side of Charing Cross Road at the junction with Flitcroft Street. It comprises a five-storey period building which is in commercial use as a restaurant on the ground floor and the four upper floors are multi-let to a range of office occupiers.

There is an entrance to a lobby and the upper floors on Charing Cross Road and an entrance to the restaurant at the corner of Charing Cross Road and Flitcroft Road. The ground floor restaurant has a contemporary predominantly glazed façade. The 1st to 3rd floors have distinctive arched sash windows and the top (4th floor) has rectangular sash windows.

The site is bounded to the north by a seven-storey commercial building at 120 Charing Cross Road, to the east by a three-storey commercial building at 12 Flitcroft Street, to the south by Flitcroft Street, a pedestrian walkway, as well as the Phoenix Theatre, and to the west by Charing Cross Road.

Charing Cross Road also forms the borough boundary with Westminster City Council. On the other side of Charing Cross Road is the construction of Soho Estates' Ilona Rose House.

Flitcroft House is not listed; however it is situated within the Denmark Street Conservation Area. The building is identified as being a positive contributor to the character and appearance of the Conservation Area. There are also a number of other heritage assets within proximity of the site, including the Grade II listed Phoenix Theatre.

Please see attached our Conservation Officer's note on the site and surroundings and an appraisal of the proposals.

The site has a public transport accessibility level (PTAL) of 6b, indicating excellent public transport connectivity.

Proposal

The proposals comprise the comprehensive refurbishment of the existing building, the construction of a two-storey roof extension for Class E office use and the reconfiguration and redesign of the current ground floor façade. A roof terrace is proposed on the roof extension to provide amenity space for occupants of the building. A plant room would also be provided on the roof extension, next to 120 Charing Cross Road.

The internal alterations include the formation of a new entrance lobby and single, central, enlarged core with new stairwell and lift.

A new entrance to the ground floor restaurant would be formed 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.

The secondary core at the rear of the building would be converted – into office space on the upper floors and into a new entrance on the ground floor and access to the basement, where new cycle and waste/recycling stores would be provided.

The two storey extension (to form new fifth floors) would be set back marginally from the existing elevations with punched arch openings in inverted scalloped bays.

The scheme also involves the activation of Flitcroft Street. Tables and chairs would be put outside and decorative lighting added.

Relevant planning history

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 – granted subject to a legal agreement – 27/07/2009

2008/3594/P - Change of use of first floor from retail use (Class A1) to office use (Class B1) – granted 17/10/2008

104 – 110 Charing Cross Road:

2016/5190/P - Erection of 2 storey roof extension with garden room and terrace at rooftop level to provide 2 x 2 bedroom flats – granted, subject to a legal agreement – 30/06/2017

Relevant policies and guidance

National Planning Policy Framework 2021

The London Plan March 2021

Camden Local Plan 2017

- G1 Delivery and location of growth
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- H2 Maximising the supply of self-contained housing from mixed use schemes
- A1 Managing the impact of development
- A4 Noise and vibration
- D1 Design

- D2 Heritage
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- T1 Prioritising walking, cycling and car-free development
- T2 Parking and car-free development
- T3 Transport infrastructure

Camden Planning Guidance

Access for All - March 2019

Amenity - January 2021

Design - January 2021

Developer Contributions - March 2019

Energy efficiency and adaptation - January 2021

Planning for health and wellbeing - January 2021

Transport - January 2021

Denmark Street conservation area appraisal and management strategy 2010

Assessment

Principle of development

The site lies in the Central London Area. Thus the proposed additional office floorspace and internal re-configurations of the existing commercial areas would be acceptable in principle under policy E1 (Economic Development).

Mixed use policy

Policy H2 of the Local Plan (2017) is the Council's mixed-use policy whereby 50% of all new 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. Under the policy, 50% of this net additional floorspace should be provided as housing, and when more than 1,000 sqm of net additional floorspace is being provided, this housing should be provided on site.

The proposed development would result in the provision of 373.2 sqm GIA of additional commercial accommodation provided.

In the first instance, it will be necessary to demonstrate that 186.6 sqm (i.e. 50% of 373.2 sqm) of new housing could not be provided at an appropriate alternative site in the area. Subject to the applicant demonstrating that this would not be possible, the payment-in-lieu for offsite provision is calculated as being £279,900 (186.6sqm x £1500 multiplier).

Urban design

The principle of a two storey roof extension is acceptable, as it reflects the height of the immediate neighbouring building to its north, the heights of buildings vary along the street, and there are some that are higher than the proposed. The varied building heights and eclectic roof forms are integral to the character of the street and the design of the roof extension should adequately respond to these characteristics.

At present, the proposals show the roof extension rising from the existing building, effectively creating sheer elevations to both Charing Cross Road and Flitcroft Street. We would suggest that the extension forms a strong corner (as shown in the proposals) but that the extension then tapers slightly on each side, forming a more acute angle at the corner. This would ensure the extension responds to the existing hierarchy of the building by becoming a slightly recessive element, and would also create an interesting roof form that would add to the established eclectic character of the street.

Overall, the architecture responds to the existing building and appears to be going in the right direction. Any roof top railings and plant should have limited or no visibility from the street.

The materiality of the extension should respond to the host building. The existing building is rendered at ground floor level, with yellow stock bricks on the upper floors that have since been painted. Ideally, consideration should be given to removing the paint to reveal the brickwork. The exposed brickwork could then inform the materiality of the extension. Choosing the materials based on the painted brickwork seems short-sighted and could impact future opportunities to reinstate historic elements on the site.

Although the extension will mean that the building is higher than the neighbouring Phoenix Theatre, the theatre is a visually prominent element of the streetscape due to its unusual form and architecture, and will therefore not be overshadowed or dominated by the increase in height.

The submissions have not shown the roof extension from the rear and its impact on 12 Flitcroft Street which is grade II listed. This view should be carefully considered as a sheer flank wall could be harmful to the setting of the heritage asset.

The increased height will not impact views to St Giles or the appreciation of listed buildings on Denmark Street.

Amenity

Policy A1 (Managing the impact of development) of the Camden Local Plan seeks to ensure that the amenity of neighbouring properties is protected, particularly with regard to visual privacy, outlook, sunlight, daylight and overshadowing, noise and vibration levels.

At the site visit, it appeared that there were windows and skylights at the rear of the site to the north (120 Charing Cross Road) which would potentially be overshadowed by a two storey extension at your site. There may also be a loss of outlook and increased sense of enclosure.

However, to advise more fully on these effects, we would need existing and proposed plans with the positions and use of the windows/rooms at the rear of 120 Charing Cross Road indicated.

A Sunlight/Daylight Assessment would more than likely be needed with any planning application to demonstrate that there would be no undue overshadowing of any habitable rooms or private amenity spaces at this or any other sites.

Officers would also not support 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 120 Charing Cross Road. There do not appear to be any windows in the roof of 12 Flitcroft Street that would be overlooked and due to the separation, there should be no undue impacts upon the properties on the other sides of Flitcroft Street and Charing Cross Road.

Depending on the use of the adjoining sites, conditions may be attached to any planning permission to control the days and hours of use of a roof terrace and to prevent amplified music from being played.

The noise climate associated with the additional storeys should be controlled under the Building Regulations.

However, to mitigate against noise and disturbance during building works, it will be necessary to specify the noise abatement measures which would be put in place in a Construction Management Plan.

The proposal to site a plant room on the roof of the new building would necessitate the submission of a Noise Assessment to demonstrate that the plant would not cause undue noise or disturbance at any noise sensitive premises (e.g. the theatre).

Transport

The development would not provide any car parking spaces. This is in accordance with Policy T2 of the Camden Local Plan which requires all new developments in the borough to be car-free. In order to prevent future occupiers from obtaining on-street parking permits from the Council, the development should be subject to a car-free agreement and this should be secured by means of a Section 106 Agreement.

Any future full application should include a Transport Assessment, which provides the information required and stated in the Council's planning guidance document CPG Transport. This should include information on trips, location of proposed servicing, as well as frequency and vehicle types.

The Council's Transport Team has advised that the existing restaurant has a licence to place 2 tables and 4 chairs on Flitcroft Street (2022/0866/TC). The Transport Officer has said that 2 tables and 4 chairs should be acceptable in the future. The lighting in Flitcroft Street may also need a licence. Please contact William Nash in our Street Lighting Team to discuss this.

No information has been provided on how contractors' vehicles would access the site and undertake operations. A draft Construction Management Plan (CMP) would need to be submitted at the application stage to clarify the details of construction access, and a detailed CMP would need to be secured via a section 106 planning obligation in accordance with Policy A1 if planning permission is granted.

Cycle parking:

We do not support vertical cycle parking spaces as they are not accessible to all users. Folding bike lockers are supported but only over and above the minimum requirements. Sheffield stands or gas assisted two tier racks are acceptable. A ceiling height of 2.605m should be enough for two tier racks. Please provide a product specification with the full planning application.

- Long-stay cycle spaces should be separated from short-stay due to security concerns.
- Long-stay cycle spaces for the office and restaurant should be separated. Short-stay spaces can be combined.
- If space is restricted, we can accept a financial contribution for the short-stay spaces. A Sheffield stand for 2 short-stay cycle spaces is £255.
- 5% of the total number of cycle parking facilities should be allocated to non-standard cycles according to the London Plan and London Cycling Design Standards. These non-standard cycle parking spaces must be clearly

signposted and/or identified with ground markings denoting they are for non-standard cycles.

- Route to cycle parking must be step-free (cycle wheeling ramp on stairs is acceptable) and well signposted.
- Should be within 50 metres of the building entrance.
- Supporting facilities such as lockers, changing facilities, a drying room and showers are recommended.
- All doors to the cycle parking area should be automated by a push button or pressure pad.

Refer to CPG Transport section 8 for types of cycle racks and measurements.

Cycle Parking Standards:

	Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
B1 business offices	• areas with higher cycle parking standards (see Figure 10.2): 1 space per 75 sqm (GEA)	• first 5,000 sqm: 1 space per 500 sqm (GEA)
A3 (old use class) restaurants and cafe	1 space per 175 sqm (GEA)	1 space per 20 sqm (GEA)

Should a full application be made, it is likely that a planning consent would need to be supported by the following S106 planning obligations:

- Car-free
- Condition securing the provision of 20 long-stay cycle parking spaces (office)
- Condition securing the provision of 3 short-stay cycle parking spaces (office)
- Condition securing the provision of 2 long-stay cycle parking spaces (restaurant)
- Condition securing the provision of 11 short-stay cycle parking spaces (restaurant)
- Construction Management Plan and associated Implementation Support Contribution – amount to be confirmed
- Construction Impact Bond – amount to be confirmed
- Delivery and Servicing Management Plan – to be confirmed
- Pedestrian, Cycling and Environmental Improvements contribution – to be confirmed
- Highways contribution – to be confirmed

Sustainability

Our Sustainability Team has indicated that the proposals would involve the refurbishment of over 1,000 sq m of commercial floorspace and so it would be a major development.

(Note: Officers are aware that you are of the view that less than 1,000 sqm of new additional floorspace would be added and that the proposal would not therefore constitute a major development).

For major developments we would require a Flood Risk Assessment/Drainage Statement, Energy Statement and Air Quality Assessment.

The Flood Risk Assessment should include:

- Surface water drainage statement
- Completed drainage Camden-GLA proforma
- Drawings showing details of SuDS extent and position (including outfalls and control points)
- Microdrainage run-off (rates and volumes) calculations
- SuDS lifetime maintenance plan (site specific)
- Details of flow routes for exceedance events
- Evidence of site surveys and investigations relating to drainage
- Management of H&S risks related to SuDS design
- Evidence of capacity confirmation from Thames Water (or initial correspondence)

Our Sustainability Team has recommended that 'as much green roof as possible' should be provided to facilitate sustainable drainage.

An Air Quality Assessment to show that the development would be Air Quality Neutral will be required.

The Energy Statement should demonstrate how, by way of the Energy Hierarchy (Be Lean, Be Clean, Be Green) the building and its plant would deliver on the energy efficiency and climate change mitigation (i.e. carbon emissions reductions) policies in the Camden Local Plan (CC1 and CC2) and the London Plan.

Conclusion

There should be no objection in principle and landuse terms to the proposals for an extension to add two additional storeys of offices and to internally re-configure the existing internal commercial spaces. As the proposal would include 373.2 sqm of new commercial floorspace, the provision of 186.6 sqm of new housing should be included in accordance with policy H2. It will firstly be necessary to demonstrate that this could not be provided on site. Then the applicant will have to demonstrate that this could not be provided at an alternative, appropriate site in the area. Subject to the above, the payment-in-lieu towards the provision of this amount of housing by the Council would be £279,900.

The siting, design, materials and appearance of the indicative proposals are broadly acceptable in conservation and urban design terms. The appearance of the additional two storey extension in the views of Charing Cross Road/Flitcroft Street

could possibly be improved by angling it away from the prominent corner. The alterations to the ground floor facades would overall be considered to be appropriate to the building and the streetscenes.

The tables and chairs and lighting in Flitcroft Street would not harm the appearance of the area or the Conservation Area although highway licences would be needed for both.

Please see above for details of the number and layout of cycle parking spaces which would be needed and Highways/Transport Management Plans and contributions which would be needed within a legal agreement.

Please also see above for details of the Flood Risk/Drainage Statement, Air Quality Statement and Energy Statement which would be needed.

If you submit a planning application, I would advise you to submit the following for a valid planning application:

- Completed form (full planning permission)
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed' (including servicing arrangements)
- Design and access statement
- Sunlight/Daylight Assessment
- Plant Noise Assessment
- Flood Risk/Drainage Statement
- Energy Statement
- Air Quality Assessment
- Transport Assessment
- Draft Construction Management Plan
- Draft Servicing Plan
- Noise assessment
- The appropriate fee

We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by putting up a notice on or near the site. We would also place an advertisement in the local press. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Adam Greenhalgh on Adam.Greenhalgh@camden.gov.uk.

Thank you for using Camden's pre-application advice service.

Yours sincerely,
Adam Greenhalgh

Planning Officer
Planning Solutions Team