

15th September 2022

PJB Planning
1st & 2nd Floor
2 West Street
Ware
Herts
SG12 9EE

Nora-Andreea Constantinescu
Planning – Development Control
Camden Council
Camden Town Hall
London
WC1H 8ND

Dear Nora,

27 Great Queen Street, London, WC2B 5BB

Planning application reference 2022/0905/P

Thank you for your email sent on 5th September 2022, the contents of which are noted and this letter seeks to address the points raised in your email.

Firstly, you have received comments from the Council's Economic Development team, which highlights that whilst marketing has not been undertaken and there would be a loss of office space, the proposed use would still generate employment, which has been highlighted in our original application submission.

I would also again refer you to the letter from Gale Priggen + Co dated 21st October 2022, submitted with the application and provides a local agents view of the office market and limited demand for traditional office space. The letter also highlights the necessary invasive and damaging works to the Grade II* listed building that would be needed to provide modern office facilities. These factors should be given significant weight in determining this planning application.

In order to accept the loss of office space, you have requested further clarification of what would be the local benefits and to provide an improved expression of these. This letter sets out the following local benefits of the proposals:

- a) The Club has 330 members – over 50% are classed as “Town” members but all members are drawn to use the Club when visiting London.
- b) The two biggest categories of membership are Music (32%) and Law (21%) and the premises is ideally situated for those members who work typically in the West End (Music) and the Inns of Court and the City (Law), representing 53% of members.
- c) It has a gender neutral approach to all employment within the club, and will, where feasible, recruit from the local community.
- d) The proposed use will continue to generate employment, with around 8 employees including office management and administration, bar staff and other part time roles.
- e) The top floor will provide 6 No. hot desks that will allow members to book a desk and work from the club.
- f) The Club has an associated charity, the Savage Club Benevolent Fund, which exists to provide financial and other support to members, former members, staff and former members of staff, as well as the families of deceased members.
- g) The Fund is financially independent, regulated by the Charity Commission, and operated by volunteers who are all Members of the Club.
- h) The ethos of the Club is to promote discussion and interaction between people with common interests, and from a cultural perspective is an integral part of the history of London and Covent Garden, having been founded just off Drury Lane in 1857. The proposed use of No.27 Great Queen Street would secure the longevity of the Club and cultural benefits that it brings to the local community.

The applicant would also confirm that they would be willing to enter into a S106 planning obligation that would endeavour to provide opportunities for apprenticeships, work experience and local recruitment where feasible.

In your email of 5th September 2022, you also raised concerns about the impact on the Public Sector Equalities Duty, particularly in relation to the need to advance equality of opportunity, and how the proposals affect access to a listed building for women, or anything other than men, unless they are guests of a male member.

In terms of a point of clarification, the Club is run on the basis that ladies can visit as guests of members. In addition, spouses and partners of members are able to visit the Club, with or without the Club member being present. The Club also invites wives, partners, daughters or carers (as appropriate) of deceased members to become a “Rosemary” (Rosemary is a symbol of remembrance). Each Rosemary receives an invitation to at least one Club dinner or other social event each year, and an annual lunch, the costs of which are covered. There are currently 60 No. Rosemaries who accept invitations to the Club, thus creating an unofficial class of honorary member representing 15% of the total number of members (330).

The following weblink to the Club’s website explains how the club is run:

<https://www.savageclub.com/>

You also refer to Policy C6 (Access for all) of the Local Plan that provide planning guidance in relation to this issue.

Local Plan Policy C6 sets out the following criteria that are promoted by the Council to provide fair access and remove barriers that prevent everyone from accessing facilities and opportunities:

- a) 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;*
- b) expect facilities to be located in the most accessible parts of the borough;*
- c) expect spaces, routes and facilities between buildings to be designed to be fully accessible;*
- d) encourage accessible public transport; and secure car parking for disabled people.*

The following sets out how the proposals seek to address each of these requirements.

Criteria a) – Whilst the proposals have been sensitively designed taking into account the Grade II* listed status of the building, with many improvements to the condition of the building (as set out in the submitted Heritage Statement), all of the designs and works proposed have had to comply with Part M of the Building Regulations.

Due to the Listed Status of the building the proposals are minimal in relation to the design and layout of the building with the main focus for the works being to ensure that building is wind and weather tight. The main works are to renew the roof coverings, undertake structural repairs to the breccummers to the floors to the front of the building and undertake damp proofing works to the lower ground floor. The proposals do not include any major remodelling of the building. Apart from the major works to safeguard the building from the elements, other works are of a replacement nature such as replacement of existing kitchen fittings and new sanitary fittings in line with the damp proofing works.

The existing building has unisex WC facilities and these are being retained, with proposed works to replace sanitary ware, new wall tiles, replace floor coverings, etc.

The existing building was not designed for disabled access and therefore there is no disabled access (wheelchair access). As the Building is Listed, Building Control guidance has been provided which confirms that as long as the proposals are not removing any existing disabled access and we are not making any access / egress around the building any worse, then the proposal is acceptable.

Criteria b) – The premises is located within a highly sustainable location within PTAL rating 6b, which is classed as the “best location” in proximity to public transport, with Holborn and Covent Garden underground station (as well as others) only a short distance from No.27. This criteria is therefore complied with.

Criteria c) – The premises are located on a main street within Central London, with wide pavement access along both sides of Great Queen Street that will allow for all users to easily access public transport and other facilities surrounding the application site.

Criteria d) – Whilst there is no on-site disabled parking, there are two identified on-street disabled parking bays located in front of No.18 Great Queen Street. These are in close proximity to the application site. As stated above the application is in close proximity to a number of underground stations and other facilities. This criteria is therefore complied with.

In relation to the PSED regulations and in particular, Section 149 of the Equality Act, the following public authority functions are highlighted and have due regard to:

- (a) eliminate discrimination, harassment, victimisation and other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The Club seeks to address each of these points in relation to how it runs the club for members; taking a gender neutral approach to employing staff within the club (it should be noted the current Assistant Secretary and Office Manager is female); providing opportunities for guests of members and also those that are Rosemaries to access the Club; and promotes cultural opportunities within the local community.

The applicant would therefore respectfully request that this letter and its contents be taken into account along with the other submitted application documents by the Council in determining the application.

If it would help to provide a better understanding about the Club, we would be very happy to meet with yourselves to discuss the matters that have been raised.

Yours sincerely,



Peter Biggs BSc (Hons) DIP TP MRTPI
Director
PJB Planning

Mobile 07710016079
Email peter@pjbplanning.co.uk