

Address:	160-161 Drury Lane & 4-6 Parker Street London WC2B 5PN		3
Application Number(s):	2023/2245/P	Officer: Enya Fogarty	
Ward:	Holborn and Covent Garden		
Date Received:	01/06/2023		
Proposal:	Demolition of existing fourth floor, replacement of fourth floor and erection of an additional storey to the building, ground floor alterations including new entrances, single storey extension to the rear, removal of existing external fire escape stair to the rear, reconfiguration of existing external plant equipment and introduction of additional plant at roof level, including associated works.		
Background Papers, Supporting Documents and Drawing Numbers: Existing Drawings & Proposed Drawings: P001/-; P099/-; P100/-; P101/-; P102/-;P103/-; P104/-; P105/-; P106/-;P120/-;P121/-; P122/-; P123/- P124/-; P130/-; P131/-; P199/-;P200/-;P201/-; P203/-; P204/-; P205/-; P206/-; P207/-; P401/-; P402/-; P404/-; P500/-; P202/A; P403/A; P501/A; P400/A Documents: Design and Access Statement dated May 2023 prepared by Ben Adams Architect; Air quality assessment dated May 2023 prepared by Air Quality Consultants; Breem Pre Assessment dated 04/05/2023 prepared by Caldwell Group; Circular Economy and Whole Life Cycle Analysis Statement dated 16/05/2023 prepared by Caldwell Group; Energy and Sustainability Report dated 31/05/2023 prepared by Caldwell Group; GLA Carbon Emissions Reporting Spreadsheet; WLC GLA Spreadsheet; Outline Structural Statement dated 12/05/23 prepared Ian Black Consulting LTD; Environmental Noise Assessment prepared Acoustics Plus; Construction/Demolition Management Plan; Statement of community involvement dated MAY 2023 prepared by McAleer and Rushe; Daylight and sunlight report dated MAY 2023 prepared by Point 2 Surveyors Limited; Town Planning Statement dated May 2023 prepared McAleer & Rushe Contracts UK Ltd; Residential Assessment prepared by Ben Adams Architects; Servicing & Deliveries Management Plan (SDMP) dated May 2023 prepared by Transport planning and highway solutions; Transport Statement dated May 2023 prepared by Transport planning and highway solutions; Travel plan dated May 2023 prepared by Transport planning and highway solutions; Ventilation Strategy Statement dated April 2023 prepared by Caldwell			

RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a Section 106 Legal Agreement

Applicant:	Agent:
please see company name c/o agent	Gerald Eve LLP 72 Welbeck Street London W1G 0AY

ANALYSIS INFORMATION

Land Use Details:			
	<i>Use Class</i>	<i>Use Description</i>	<i>Floorspace (GIA sqm)</i>
Existing	Class E - commercial, business and service use		1,221
Proposed	Class E – commercial, business and service use		1,491
	TOTAL UPLIFT		270

Parking details			
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – commercial long stay	0	22	22

EXECUTIVE SUMMARY

The application site occupies a plot on the corner of Parker Street and the southern end of Drury Lane. The existing site contains a five storey (plus partial basement) office building with retail units at ground level and is situated within the Seven Dials/Covent Garden Conservation Area.

Planning permission is sought to extend the building upwards. This would involve the demolition of the existing recessed top floor and the erection of two replacement floors together with a new plant room above. The proposed extension is part of a comprehensive refurbishment of the whole building where the property would effectively be stripped back to its frame and then fully retrofitted to a modern standard including redesigned elevational treatment as well as the reprovision of the main office entrance.

The provision of additional office floorspace within the Central Activities Zone (CAZ) is welcomed. Given its site constraints, the proposal fails to provide any housing on-site and a financial viability assessment has been provided in order to justify the lack of provision. A policy-compliant scheme would provide a significantly lower return on costs which would make the scheme unviable for its intended employment use. It is not possible for the required housing to be provided off-site and therefore the Council will secure a payment-in-lieu towards affordable housing provision elsewhere in the borough. The section 106 legal agreement will also secure obligations to mitigate the impact of the proposal on neighbouring properties; the transport impacts of the scheme and the sustainability impacts.

The proposal is considered to be acceptable in terms of the key considerations, namely: the principle of development / land use; the affordable housing contribution; heritage and design; transport; waste and recycling; sustainability and air quality. Whilst there will be some impacts to a number of adjoining residential units, these impacts are not considered to cause detriment to amenity standards that might warrant a reason for refusal and, when considering the merits of the scheme it is considered that the proposal complies with the development plan as a whole.

OFFICER REPORT

Reason for Referral to Committee: The Director of Economy, Regeneration and Investment has referred the application for consideration after briefing members [Clause 3(vii)]. The panel considered it should be heard by Planning Committee due to the complexity and nature of objections

1. SITE AND BACKGROUND

Location

- 1.1 The application site relates to a five-storey commercial building on the corner of Drury Lane and Parker Street. The building was constructed in the mid-1980s as part of a wider redevelopment scheme of 4-24 Parker Street & 160-161 Drury Lane. The building's architecture is of its time, being dressed in buff brick with contemporary references to 19th Century warehouse and wharf typologies.

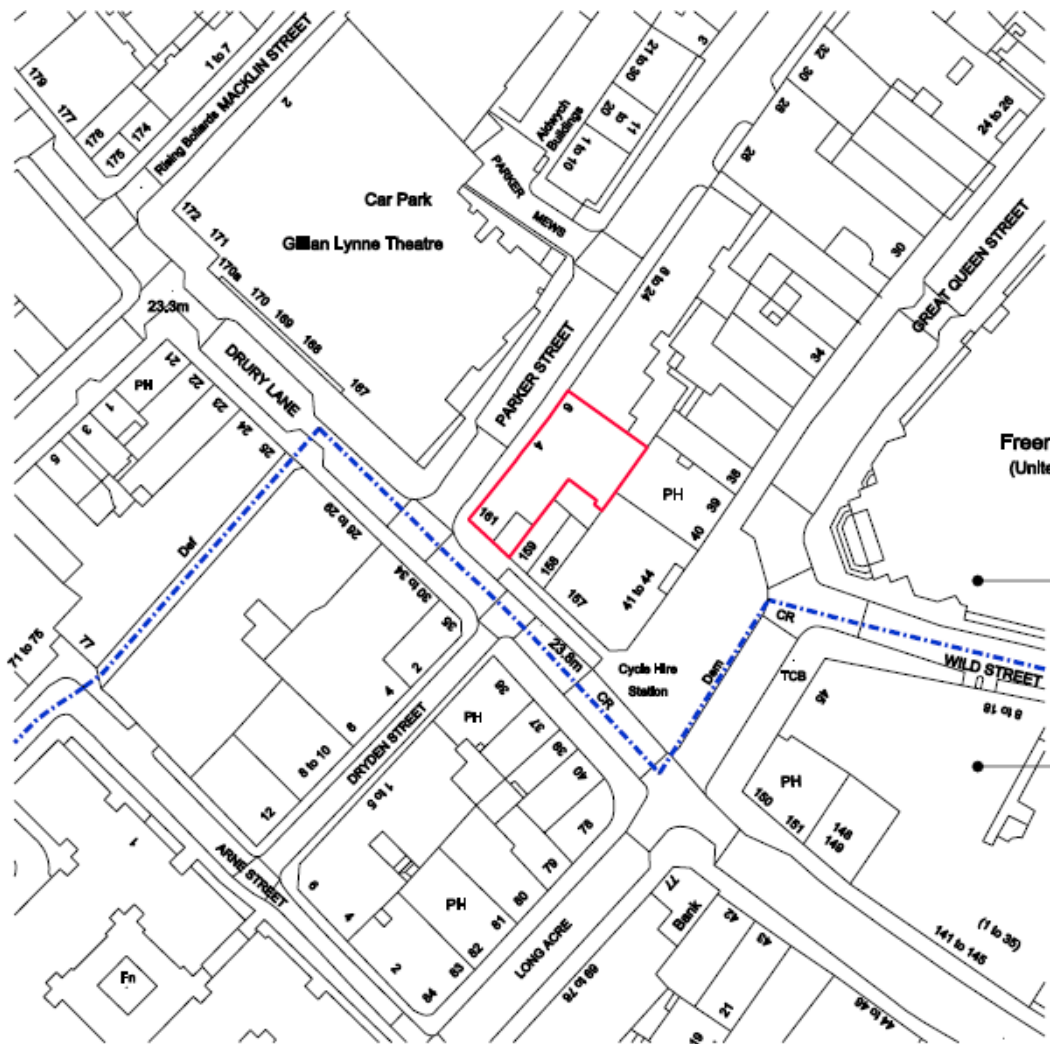


Figure 1 – The site

- 1.2 The application site is located within the Seven Dials Conservation Area, though it is regarded as making a neutral contribution to the Conservation Area within the local conservation area statement. The site does not include any listed buildings and does not directly adjoin any listed buildings, though a number of listed buildings exist along Great Queen's Street to the east and north including the Freemason's Hall Grade II*). The centre line of Drury Lane represents the boundary to both the conservation area as well as the Borough, with Westminster and the adjoining Covent Garden conservation area on the opposing (south) side of the street. As well as being within the 'Central Activities Zone', Drury Lane is also designated as a secondary retail frontage.
- 1.3 The existing building is arranged as offices on upper floors while the ground floor is set out as four retail units and the office entrance. The retail units appear to have been vacant since 2017.
- 1.4 Adjoining to the north at 8-18 Parker Street is a ground plus four storey residential block of flats known as Market House. Residential premises also adjoin or closely bound the site, on the upper floors of commercial buildings to the south and east at 158/159 Drury Lane and 37-40 Queen Street.

2. THE PROPOSAL

- 2.1 Planning permission is sought to extend the building upwards by approximately one-storey above its existing height, after having removed the existing recessed fourth storey and continuing up in a rebuild of the style below before finishing with a new recessed top (fifth) storey. A plant enclosure would then be built to sit above that as a part sixth storey extension. To the rear, the external fire escape staircase will be removed and a first-floor rear extension with terrace atop, would be constructed above the existing single storey extension on this part.
- 2.2 The proposal for additional height to this building follows on from an earlier precedent set by a 2019 approved scheme (2019/2095/P) which added 2 new floors to the building. The current scheme is a slightly scaled down version of the previous one, dispensing with the 6th floor with a plant room instead, although the fifth floor is built out fully to the rear rather than employing a setback; but having a small setback to the front. The comparative sections between the existing, 2019 and current schemes is shown in figure 2 below. It should be noted that the planning permission for the 2019 scheme has now expired and it is understood that the sixth floor roof top addition in that scheme was found not practicable to build, so is not considered to present a viable alternative to fall back upon should the current scheme not be approved or otherwise not progress.

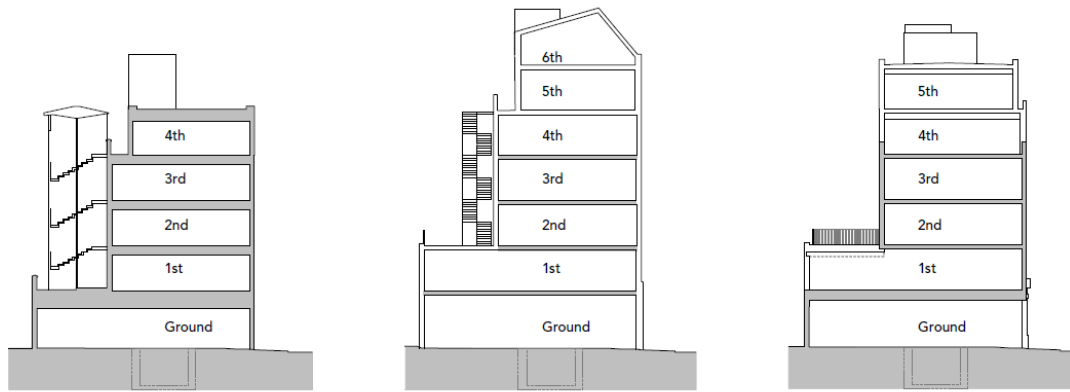


Figure 2: Existing, previously consented scheme under planning ref 2019/2095/P and proposed section

3. RELEVANT HISTORY

The site

- 3.1 P14/35/E/30685: Planning permission was granted on the 07/08/1980 for the 'Redevelopment by the erection of a part 4/5-storey development on Parker Street and a 4-storey development at 160 Drury Lane to provide 1,150 sq. metres residential (20 flats), 525 sq. metres office, 700 sq. metres retail, and 75 sq. metres storage accommodation.
- 3.2 P14/35/E/36129: Planning permission was granted at 4-24 Parker Street & 160-161 Drury Lane, WC2 on the 18/02/1985 for the 'Redevelopment of the site by the erection of a new building comprising basement, ground and 4 storeys to provide residential, offices, retail, light industry and integral garages.
- 3.3 PSX0004507: Planning permission was granted at 160-161 Drury Lane on the 26/06/2000 for the 'Relocation of existing shopfront entrance doors.
- 3.4 2007/5484/P: Planning permission was refused at 161 Drury Lane on the 20/12/2007 for the 'Alterations to shopfront, including extension to front facades in front of existing pillars and with a new glazed design and relocation of entrance door to corner of Drury Lane and Parker Street
- 3.5 2008/1297/P: Planning permission was granted at 160-161 Drury Lane on the 21/05/2008 for the 'Alterations to the shopfront, including the relocation of entrance door to corner of Drury Lane and Parker Street
- 3.6 2019/2095/P (unimplemented, now expired): Planning permission was granted on the 16/10/2019 for 'Demolition of existing 4th floor and erection of two storey plus roof extension; full re-skinning of the facades; ground floor alterations including new entrances and shop fronts; single storey rear

extension to closet wing; and reconfiguration of existing plant equipment and rear escape stair. All in connection with the use of the building as offices (Class B1a) at part ground and upper floors with ground and partial basement level commercial unit in flexible retail or restaurant/café (Class A1/A3)'.

3.7 It should be noted the material difference between this proposed scheme and the previously approved scheme under 2019/2095/P are as follows;

- The design of the façade.
- The redesign of the roof as the roof extension subject to this application extends out to the existing rear building line and is flat.
- Previous scheme had plant at ground floor level while this scheme proposes plant at roof level.

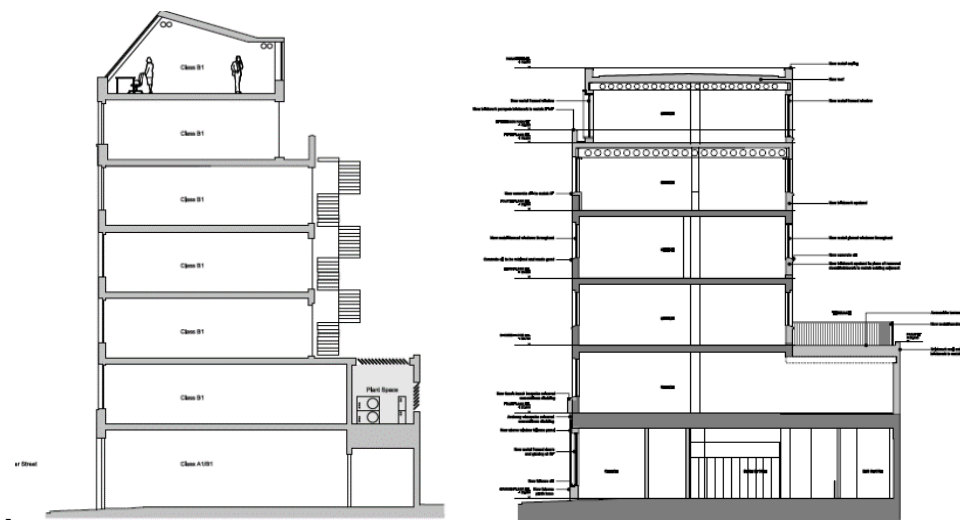


Figure 3: **Previous scheme - 2019/2095/P** **Proposed scheme**

The area

- 3.8 Drury Lane East side (Camden) 158-159 Drury Lane, WC2. **8700087:** Conditional permission was granted on the 23/04/1987 for the '*Works of refurbishment and change of use at 158 & 159 Drury Lane to provide 3 self-contained residential units on the first second and third floors cafe with ancillary storage on ground and basement of 158 and shop and storage at 159 ground and basement and erection of rear extension*'
- 3.9 158-159 Drury Lane, WC2. **8703598:** Conditional permission was granted on the 11/02/1988 for the '*The erection of a roof extension and rear extension together with works of conversion to create three two- bedroom and two one-bedroom units across the first, second, third and new fourth floors; restaurant with ancillary storage on ground floor and basement of no.158 and shop and storage on ground floor and basement of no.159*'
- 3.10 Drury Lane West side (Westminster)- 30-35 Drury Lane, 2 Dryden Street and 4-10 Dryden Street (Opposite Site) **18/07715/FULL:** Conditional planning

permission was Granted on the 13/02/2019 for the following works: '*Removal of existing third and fourth floor levels and roof top structures and partial demolition of Shelton Street elevation (third floor only); construction of new floorspace and internal reconfiguration resulting in a part five and part six storey building with roof top plant enclosure, to provide flexible commercial use including retail (Class A1), financial and professional services (class A2) restaurant (class A3), office (class B1) and /or assembly and leisure (class D2) at basement and ground floor level and office use (Class B1) at first to fifth floor levels; refurbishment of external elevations; roof terraces, plant, cycle parking and facilities for access and servicing*'.

4. CONSULTATION

Statutory consultees

Thames water - No objection

- 4.1 A consultation letter was received from Thames water. Due to the location of the development near a strategic sewer, Thames have requested a condition requiring a piling method statement to be attached to the planning application.

- 4.2 Westminster LPA- No objection

Local groups

Seven Dials/ Covent Garden Conservation Area Advisory Committee CAAC

- 4.3 Objection covering the following issue(s):

- Object to the proposed height of the roof extension. The intention to add an extra storey (after first demolishing & replacing the 4th floor) will make this tight little corner overwhelming. The street is narrow and at that junction more so.
- The proposed extra height does not keep the line of its surrounds and will have a seriously negative impact on the street scape.
- Tuscan columns should be retained as they are original features. The proposed ground floor design is weak.

Seven dials trust

- 4.4 Objection covering the following issue(s):

- The proposals will result in a building which is one storey higher, and more incongruous and dominant in the townscape.
- The proposal would fail to preserve the setting of the Seven Dials CA. It would cause harm to this designated heritage asset.

Adjoining occupiers

- 4.5 Three sites notice were displayed, one in front of the application site, one in front of 20 Parker Street and one in front of 36 Drury Lane. The notices were displayed on 30/06/2023 until 24/07/2023 and the application was advertised in the local paper on 29/06/2023 (expiring 23/07/2023).
- 4.6 Objections were received from at least 15 properties including in Parker Street, Drury Lane and Great Queen Street. The objections received are on the Council's website. The key issues raised are summarised as follows:

Heritage

- The proposed roof extension is dominant and incongruous.
- Roof extension would not fit in with the wider character and streetscape due to its 'block' design.
- The proposed roof extension would disrupt the roofline and would result in additional bulk.
- 1st floor rear extension would dominate the courtyard.

Officer response: Please see design and conservation section below

Amenity

- Proposed terrace would cause loss of privacy and noise disruption to 158, 159 Drury Lane, 8 Parker Street 12-16 Parker Street, 38 & 39 Great Queen Street.
- First floor rear extension overbearing visual impact upon residents in 158, 159 Drury Lane, 8 Parker Street 12-16 Parker Street, 38 & 39 Great Queen Street and loss of light to communal courtyard.
- Loss of light from extensions proposed would cause an adverse effect on amenity, particularly in relation to (Flats 2, 3, 4, 6) 158, 159 Drury Lane, 8 Parker Street, 12-16 Parker Street, (Flat 3) 38 & 39 Great Queen Street.
- Inappropriate location of bin and cycle store and resulting noise disruption from movement.
- Loss of outlook and added sense of enclosure.
- Ventilation of the bin area should be 100% passive.
- Do not want early morning or late-night deliveries or late night opening of unit due to potential anti-social noise.
- Local residents will not get any benefit from the proposed scheme.

Officer response: Please see amenity section below

Use

- *Concerns that a restaurant may be accommodated within the building without planning permission. As a result, the same conditions which were attached during the 2019 application should be reattached to ensure there is no impact on neighbouring amenities.*
- *Hours of use of the site would be conditioned and should not operate past 8pm*
- *Both the Camden Local Plan and the Camden Employment Land Review were published before the Covid-19 pandemic and therefore do not account for the significant changes to office demand.*
- *Retail use would result in antisocial behaviour.*
- *No cooking should be allowed on site.*
- *Could result in an additional late-night venue.*

Officer response: *Please see land use*

Construction impacts

- Construction management impact of noise, and dust will be considerable. As a result, hours of construction must be restricted.
- Dust will be a very real issue, and we urge the Council to require any construction management plan to incorporate additional cleaning for adjoining residents (including windows).
- Deliveries will need to be restricted to the hours 0900-1700 and vehicles are to be appropriately managed

Officer response: *Please see construction*

5. POLICY

National and regional policy and guidance

National Planning Policy Framework 2023 (NPPF)

National Planning Practice Guidance (NPPG)

London Plan 2021 (LP)

London Plan Guidance

Written Ministerial Statement on First Homes (May 2021)

Local policy and guidance

Camden Local Plan (2017) (CLP)

G1 Delivery and location of growth

H1 Maximising housing supply

H4 Maximising the supply of affordable housing

C5 Safety and security

C6 Access for all

E1 Economic development

E2 Employment premises and sites

E3 Tourism

A1 Managing the impact of development
 A2 Open space
 A3 Biodiversity
 A4 Noise and vibration
 A5 Basements
 D1 Design
 D2 Heritage
 D3 Shopfronts
 CC1 Climate change mitigation
 CC2 Adapting to climate change
 CC3 Water and flooding
 CC4 Air quality
 CC5 Waste
 TC1 Quantity and location of retail development
 TC2 Camden's centres and other shopping areas
 TC4 Town centres uses
 T1 Prioritising walking, cycling and public transport
 T2 Parking and car-free development
 T3 Transport infrastructure
 T4 Sustainable movement of goods and materials
 DM1 Delivery and monitoring

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

CPG Access for all (March 2021)
 CPG Air quality (March 2021)
 CPG Amenity (March 2021)
 CPG Design (March 2021)
 CPG Developer contributions (March 2019)
 CPG Employment sites and business premises (March 2018)
 CPG Energy efficiency and adaptation (March 2021)
 CPG Town centres (March 2018)
 CPG Transport (March 2021)

Seven Dials Conservation Area Statement – 1998

6. ASSESSMENT

6.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

7-9	Land use <ul style="list-style-type: none"> - Office uplift (Class E) - Retail (Class E) - Mixed Use Policy and affordable housing - Conclusion; Land Use Principles
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10	Neighboring Amenity <ul style="list-style-type: none"> - Policy review - Introduction - Loss of light - Outlook - Loss of privacy - Noise
11	Design and conservation <ul style="list-style-type: none"> - Policy review - Historic development and surrounding townscape - Summary - Site and setting - Proposal and assessment - Conclusion
12	Sustainability and Air quality
13	Transport considerations <ul style="list-style-type: none"> - Policy review - Site location - Cycle parking & Car parking - Construction management - Deliveries and servicing - Highway works
14	Waste and recycling
15	Section 106 legal agreement and Community Infrastructure Levy (CIL).
16	Conclusion

7. LAND USE

7.1 The principal land use considerations are as follows;

- Introduction
- Office uplift
- Retail
- Mixed Use Policy and affordable housing
- Conclusion; Land Use Principles

Introduction

7.2 The proposed development involves the comprehensive refurbishment of the whole building as well as extensions to the building on the roof and to the

rear to provide an employment led scheme. The new floorspace is to provide Class E (Commercial Business and Service).

OFFICE UPLIFT (CLASS E)

- 7.3 Policy E1 states that the Council will direct new office development to the growth areas, Central London, and the town centres in order to meet forecast demand. Policy E2 (Employment premises and sites) states that the Council will encourage the provision of employment premises and sites in the borough. It also states that consideration will be given for higher intensity redevelopment of premises suitable for continued business.

Use Class	Existing (sqm)	Proposed (sqm)	Difference (sqm)
Class E	1221sqm	1,491sqm	270sqm

- 7.4 The proposed development would result in a total uplift of 270sqm (GIA) to the existing building, resulting in the existing quantum of office space increasing to 1,491sqm. The works to extend and refurbish would result in the creation of high spec offices which extends the service life of the existing building and continue to complement the mix of uses within the local vicinity. The site is within a highly accessible location and is considered a sustainable location for increased office development in line with the Local Plan. Due to the narrow plot width, relatively small floor plate and positioning of central core, the building could be split between numerous tenants (as is currently the case) or retained for a single business, meaning that it could still flexibly accommodate a range of sizes of enterprises in the future. This means there is the potential to allow the existing occupiers to return to the building after the redevelopment, which is welcomed. As such, planning and economic development officers in line with the adopted economic growth policies (E1 and E2) welcome the increase of employment floorspace within the site in principle.

- 7.5 Policy E2 (f) also sets out that as well as expecting floorspace suitable for small-medium enterprises (SMEs), securing managed affordable workspace should be explored. As set out above, the new office would feature a floorplate and layout that would allow for subdivision of floors to host a number of individual smaller tenants, however, the development would not provide any affordable workspace. Though not explicitly set out in the policy wording, the supporting text as well as the Employment Sites CPG reference state that affordable workspace will be typically sought for larger scale scheme with uplifts of +1000sqm (para.38). Given the limited uplift proposed, as well as the fact that the scheme would make a fully policy compliant

contribution towards the provision of housing/affordable housing (see following section), this is considered acceptable in this instance.

- 7.6 Though the application is not of major scale, a legal obligation is sought to ensure that local residents benefit from the proposed scheme in line with the CPG Employment sites and business premises (2018). This would relate to both the construction phase and end phase of development. For construction, this would include a commitment to working to CITB benchmarks for local employment when recruiting for construction-related jobs, for all construction vacancies and work placement opportunities to be advertised exclusively with the King's Cross Construction Skills Centre before marketing more widely and for a Local Procurement Code to be agreed if the value of the scheme exceeds £1million. In addition, this would include a commitment to facilitate promotion of the Camden STEAM Commission objectives amongst end use occupiers. These obligations would be secured through a section 106 agreement.
- 7.7 Subject to the suggested terms of the S106 legal agreement, the provision of the additional commercial floor space is considered to be acceptable in principle.

8. RETAIL

- 8.1 Policy TC1 seeks to focus new shopping uses in the designated growth areas and existing centres, Policy TC2 promotes successful and vibrant centres throughout the borough, to serve the needs of residents, workers and visitors, and Policy TC4 seeks to ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. Managing the impact of such uses on local amenity is a particular issue in Central London where residential communities are closely mixed in with a range of other uses.
- 8.2 The site is located within the Covent Garden / Seven Dials retail centre and occupies a section of a designated secondary frontage. The frontage within which the site includes a commercial unit on Drury Lane and fronting Parker Street. Historically, the lawful use of the ground floor is retail (A1 use) alongside a corner office entrance.
- 8.3 The permission would seek to reprovide a commercial unit at ground floor level (see below). The applicants have stated that their intention would be to secure either a retail or café use for the ground floor unit.

this is shown to be unfeasible. This would equate to an expectation for 135sqm of residential to be provided, which would be considered to have capacity to deliver approximately 1-2 homes.

- 9.3 The potential for the building to accommodate residential units at upper floors has been explored by the applicant, however, a number of factors are considered to constrain the potential for the provision of onsite housing. Most significant of these is the fact that the building has a relatively narrow but long footprint and includes only one core. In order to meet best design practice, any onsite residential would usually be expected to feature a dedicated ground floor entrance and core as well as ancillary ground floor storage areas.
- 9.4 The spatial requirements of such provision would have a significant impact on the usable floor space and number of people working in this building. To test the potential for provision with a shared core arrangement, two design options were prepared and plans were drawn up to show how this might be accommodated. Option 1 would provide ground floor apartments although offering the best use of the available GIA, would be single aspect (in part), would not have access to amenity space and would cause security concerns. In addition, the ground floor option would result in dead frontage on Drury Lane detrimental to town centre policy aims.
- 9.5 Option 2 would provide residential units on the 3rd floor meaning that only 50% of the GIA available would be meaningful residential use and the remainder access/core. This would be an inappropriate way to allocate space for housing and would have a detrimental effect on the office use within the building. The office use is the main use of the site and as such, it is important that this workspace is high quality. Smaller floor plates would become significantly less attractive to tenants and impact the viability of the scheme significantly.
- 9.6 With this in mind, it is acknowledged that the provision of onsite housing on this site would harm the function and quantum of business uses onsite and would result in a less than optimum use of the site in land use terms. Given that the development is not of a significant scale (with an uplift of significantly less than the 1000sqm threshold where the policy expects the housing to be provided on-site) and would provide additional employment space within the CAZ (another priority land use in the Borough), the lack of onsite provision is consequently accepted. In line with policy H2, where such provision cannot be made a payment in lieu may be accepted.
- 9.7 In order to address this shortfall in housing provision, a financial contribution would therefore be secured to address this policy requirement based upon the floorspace uplift of the development and the £1,500sqm per square metre (GIA) formula set out in Camden's Planning Guidance for Housing 2021. The

on-site housing shortfall being 135sqm in this case would generate a requirement for a contribution of $135 \times £1,500 = £202,500$.

- 9.8 Subject to the legal agreement to secure these monies, the development would be considered to accord with policy H2.

10. IMPACT ON NEIGHBOURING AMENITY

- 10.1 The considerations on the impact on the amenity of the occupiers of neighbouring properties are as follows:

- Policy review
- Introduction
- Loss of light
- Outlook
- Loss of privacy
- Noise

Policy review

- 10.2 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impacts from construction works are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of residents should be protected and development which causes an unacceptable level of harm to amenity should be refused.

Introduction

- 10.3 The closest residential properties to the application site are 158 Drury Lane, 12-18 Parker Street and 37-40 Great Queen Street.

Daylight and sunlight

- 10.4 A Daylight, Sunlight and Overshadowing Report has been submitted as part of the application prepared by Point 2 Surveyors which details impacts upon neighbouring properties.
- 10.5 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 10.6 Paragraph 125 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or

guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site.

Methodology

- 10.7 The BRE assessment methodology has been used for assessing the effects on existing surrounding properties, including daylight (the two-part assessment of VSC and NSL) and sunlight (the two-part assessment of APSH annually and in winter) to buildings and sun-on-ground to amenity spaces.
- 10.8 Detailed tabulated results have been provided showing the daylight and sunlight levels in the existing and proposed conditions, the absolute loss (existing value minus proposed) and relative loss (absolute loss divided by existing value, expressed as a percentage).
- 10.9 The BRE standard numerical guidelines have been applied to establish the number of impacts on each property (or group of properties) that are within the guidelines and the number that are outside the guidelines.
- 10.10 The methodology and criteria used for the assessment are based on the approach set out by BRE guidance. The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:
- Vertical Sky Component (VSC) – This relates to daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
 - *The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (i.e. a reduction of more than 20%) its former value.*
 - No Sky Line (NSL), also known as Daylight Distribution (DD) – This relates to daylight penetration into a room. The area at desk level (“a working plane”) inside a room that will have a direct view of the sky.
 - *The NSL figure can be reduced by up to 20% before the daylight loss is noticeable (i.e. retain 0.8 times its existing value).*
 - Annual Probable Sunlight Hour (APSH) - A measure of the amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms.
 - The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. Impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.

- The overshadowing of open spaces is assessed by considering any changes to surrounding outdoor amenity spaces. A Sun Hours on Ground assessment has been undertaken which uses the BRE methodology.
- The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on the 21st March; if below that the area which can receive some sun on the 21st March should not be reduced to less than 0.8 times its former value

Alternative target values

10.11 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like Central London or Growth Areas. As a result, it recommends setting alternative targets which take account of relevant local context.

10.12 The London Plan Housing SPG states:

The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

Whilst not a housing scheme in this case it is still considered that similar principles extend to optimising the use of valuable sites in the central area while still achieving reasonable expectations for daylight and sunlight for residents.

10.13 For urban development densities found more typically in Camden such as Kings Cross Central and the Georgian Townscapes in Bloomsbury or Covent Garden planning officers have noted that VSC values of 15% to 20% can be tolerated as an acceptable norm. There will always be the higher values of 27% and above found in dwellings on upper floors or facing across open spaces like parks, squares and larger gardens, while at the same time VSC values of less than 10% are common, more usually for secondary windows such as those facing into alleyways and lightwells. The reliance on artificial lighting for such rooms can be accepted, especially where the room itself also serves a secondary function or used more at night-time such as a bedroom.

Assessment

- 10.14 A daylight sunlight assessment was carried out by Point 2 consultants on behalf of the applicant. This assessed six neighbouring residential buildings around the site comprising flats at:

159 Drury Lane
40 Great Queen Street
39 Great Queen Street
38 Great Queen Street
37 Great Queen Street
Market House at 8 -18 Parker Street



Figure 5: Location of surrounding residential properties tested in aqua and application site in orange

- 10.15 The VSC test found that no windows in either 37, 38 or 39 Great Queen Street were adversely affected in terms of daylight (i.e. reduced values by 20% or more). The NSL test, which assesses the visible skylight in a room on a reading plane (and therefore how daylight is actually perceived from within a room) found that no rooms were adversely affected in either 37, 38 and 39 Great Queen Street and 8 -18 Parker Street.

- 10.16 Whilst the compliant NSL readings would generally be regarded as the more accurate indicator of acceptable daylight, a more detailed look at the VSC results for 8-18 Parker Street is merited given the strength of local objections.

Market House, 8-18 Parker Street

- 10.17 The test for this building identified possible adverse impacts for 2 windows out of the 31 tested, which face the north elevation of the development squarely across roof terraces on the fourth and fifth floor levels of the building known as Market House. The first of these windows serves a bedroom on the fifth floor. The reduction of 27% VSC retains a value of 23.69% VSC which is still good for an urban location such as this where values of 15-20% are considered a reasonable alternative standard for this location to the BRE's national target 'minimum' of 27%. The other failing (29% reduction) is to a window which is one of 6 serving a living/dining room at fourth floor level, the other 5 windows all retaining values within 20% of their existing and therefore pass the BRE test. The affected windows are shown on figure 6 below.

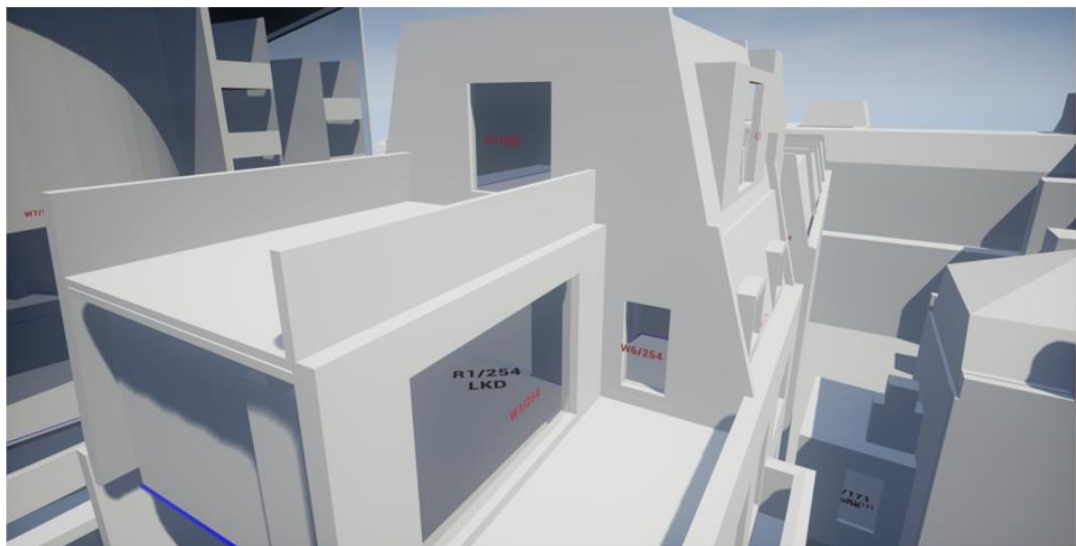


Figure 6: Fourth and fifth floor residential windows of 8-18 Parker Street facing the north elevation of the development

- 10.18 It is noted that VSC values for 11 of the windows tested at 8-18 Parker Street on the lower floor levels actually showed an improvement in daylight levels. This would be due to the removal of the external staircase as part of the proposals.
- 10.19 The remaining two buildings which require closer examination are 40 Great Queen Street and 159 Drury Lane.

40 Great Queen Street

- 10.20 40 Great Queen Street comprises a licenced premises with residential accommodation on the floors above. The rear windows squarely face the proposal site on a north-westerly aspect but are tightly hemmed in to the south-west and north-east by the projecting flank walls of the buildings either side. The building to the southwest, a 6-storey office with further plant storey is particularly tall and overshadowing. The light levels reaching its rear windows are already very low with VSC levels of only 3.24%-10.42%. The NSL values are similarly substandard. These windows therefore stand to be affected by any intrusions above the existing skyline on the proposal site and whilst the absolute losses are low (only 1% or 2% VSC) these translate to proportionately significant percentage losses in some cases exceeding the standard. The absolute losses however are unlikely to be noticeable at this level and therefore it would not be considered reasonable for this to prejudice the application.

159 Drury Lane

- 10.21 Similarly 159 Drury Lane is overshadowed on virtually all sides to its rear and there are 1 or 2 cases of quite severe technical breaches of the VSC test albeit rather minor absolute reductions. Nevertheless 18 of the 20 windows affected still pass the VSC test in terms of their being impacted by less than 20%. Only 2 of the 9 rooms experience NSL losses of more than 20%, and neither of these exceed 30% so are considered relatively minor overall. Again, considering the very low absolute losses of VSC (both rooms losing more than 20% NSL experience no more than a 1% loss of VSC) this is not considered to result in significant enough harm to the living conditions of the properties affected to justify refusal of the application.

Sunlight impact

- 10.22 Point 2 have also examined the impacts on sunlight but found no breaches for any of the rooms tested.
- 10.23 In terms of the sun-on-ground test for amenity spaces the lower level outside spaces accessed by neighbouring flats already receive no direct sunlight on the test date of 21st March. The two amenity spaces that do benefit from sunshine are 4th and 5th floor roof terraces serving flats in Market House (8-18 Parker Street). There is a breach of the BRE standards arising in regard to the 5th floor terrace which sees its area enjoying more than 2 hours of sunshine reduced from 67% to 28%, being beyond the permissible 20% change from its former value. However the remaining sunny spot is located at the most useable part of this roof terrace directly adjacent to its point of access from the flat it serves. It is therefore considered that this terrace retains the ability to be enjoyed as a fully functioning amenity space for the flat concerned and that the impact arising in this instance is not significant enough to result in rejection of the application.

Previous approved scheme

- 10.24 It is also to be borne in mind that there was the approval of a previous scheme in 2019, which was for similar scale extensions to the host building. This proposed an office floorspace uplift of 412sqm (GIA) compared to 270sqm (GIA) in the current case. The main difference between the two schemes in massing can most clearly be seen in section with the 2019 scheme being of slightly increased height with occupiable floorspace rather than just a plant room at 6th floor level; although the new fifth floor of the current scheme, as experienced from the rear elevation, extends to the full footprint of the floors below rather than employ a setback as does the 2019 scheme. The net result is an overall amenity impact that is slightly less in the present scheme overall. In terms of the sun on ground indicator and impact on the terrace of the fifth floor flat of Market House, the impact is similar, with a reduction from 67% to 31%; again beyond BRE's permissible 20%, although slightly less of a reduction to this part in the 2019 scheme due to the effect of the rear setback. Whilst this comparison is academic as the 2019 scheme has now expired, it is still a noteworthy example as to what has been found acceptable in the past on this site.

Resident's own commissioned daylight sunlight assessment

- 10.25 The residents of neighbouring properties in Parker Street and Drury Lane have commissioned their own daylight and sunlight consultant 'Right of Light Consulting' to undertake a review of the applicant's report by 'Point 2'. They say they have based their modelling on internal and external scans of their clients' properties undertaken on site and therefore consider their results as likely to be a more accurate reflection of the issues.
- 10.26 Right of Light have identified an additional transgression in the case of a fourth floor flat in 158 Drury Lane which is reduced by 5.1% VSC from 23.9% to 18.8% VSC representing a 21% loss. While this exceeds the permissible 20% it is a marginal transgression and officers do not consider this significant enough to alter the conclusions drawn from Point 2's assessment.
- 10.27 Right of Light Consulting for the residents are also flagging a concern that there is a significant difference between their VSC results for the window on the fifth floor of Market House (8-18 Parker Street) which Point 2 have calculated to be 32% before the development and 23% with the development in place. Right of Light have calculated this to be 23% without the development and 15% after which would be a 32% reduction in VSC rather than 27% according to Point 2. Their internal survey of the building also identifies the room affected to be the main living room of a self-contained studio flat rather than a bedroom associated with a 4th/5th floor maisonette as assumed by Point 2.

- 10.28 On being asked to respond to the Right of Light review, Point 2 have highlighted that Right of Light do not base their results on any drawings which could give rise to discrepancies from not properly modelling complex external obstructions such as the staircases, chimneys, exhaust ducts and railings. However whether or not this might account for the quite large deviation regarding the fifth floor studio flat window, a cursory look at the site circumstances of this window situated at the back of a 24 sqm terrace between it and the subject site the height of which at present hardly extends higher than the mid point of this window, would suggest an existing VSC value of 23% (below the usual minimum accepted standard by BRE) is significantly less than that which might be expected. Nevertheless 15% is still just about in line with the typical values accepted for other residential accommodation in this central London area. It is noted that neither consultant finds any impact on NSL to this room.

Daylight / sunlight (BRE) summary

- 10.29 Officers acknowledge that the proposed development is within a dense urban environment, within Zone 1 of Central London, and the design and nature of some of the existing neighbouring buildings is such that there are pre-existing shortfalls in daylighting relative to the normal BRE Standards. It is also noted that due to the aforementioned density of surrounding development, any additional height permitted would result in some loss of daylight to some of these facing windows. However in light of the commissioned daylight and sunlight tests and on-site officer assessment, it is not considered that the additional reductions result in any undue impacts on residents' amenities.

Outlook

- 10.30 Those elements of the scheme with the potential to cause harm to existing outlook of adjoining occupiers would be the proposed extensions at upper floor (fourth and fifth levels) and rear infill extension at 1st floor level
- 10.31 The host building directly opposes commercial buildings to the South (157 Drury Lane), the North (Gillian Lynne Theatre) and West (30-35 Drury Lane in Westminster). While the extensions would project in front of facing windows to these properties, it is noted that policy A1 does not include provisions for the protection of outlook from most non-residential uses on the basis that these rooms are used for short periods or places of employment only and thus would not relate to 'living conditions'. Nevertheless, it is noted that the upper floor extensions would have an adequate separation distance from those buildings listed above respectively and so the increased roof volume is not considered to result in any overbearing relationship to these properties, given its form and siting.

10.32 The site is also adjacent to a number of residential properties. This includes the following:

- upper floors of 158/159 Drury Lane
- no.8-12 Parker Street
- and, to its Northern end, the site also partially opposes nos.40-39 Great Queen Street that include residential units at upper floors.

158/159 Drury Lane

10.33 These properties host two commercial units at ground floor level. The upper floors of the two properties have been combined to provide a total of five flats with a single shared entrance (see planning history). These flats are dual aspect, with front aspects over Drury Lane and rear aspects along the shared rear lightwell of the city block. Based on what was observed on site, it is understood that these units are laid out as follows: Flat 1 (one bedroom first floor flat, 158), flat 2 (one bedroom first floor, 159), flat 3 (second floor two bedroom flat, 158/159), flat 4 (third floor two bedroom flat, 158/159), flat 5 (two bedroom flat to mansard roof, 158/159). During the site visit it was observed that flats tended to host bedrooms to the front overlooking Drury Lane and living rooms to the rear.

10.34 No part of the proposed development would extend within the front aspect of these properties, meaning that the rear aspect only needs further investigation. The existing rear elevations of these properties are shown in the photographs below.



Figure 7 - Rear elevations of no.158/159 Drury Lane @1st floor level (bay window and above, buff brick to the right of image 2 is the rear of the application site)

- 10.35 The fourth-floor level extension would not detrimentally impact the outlook for these properties between 1st and 3rd floor levels as it would extrude the existing building elevation upwards. However, this extension would project slightly in front of the rear aspect to the rear windows and terrace of the top floor flat. This increased mass would result in some loss of outlook from these windows/terrace. However, given that it only projects slighter deeper than the existing, this proposed additional mass would still enable rear views to be afforded from the majority of its windows (158/159). Though this would cause the existing situation to change to a degree for the occupants of this unit, it is not considered that this addition would result in a harmful loss of outlook.
- 10.36 As well as roof extensions, the proposal would also include a first floor rear extension replacing the existing fire escape. At present, these units have a rear, north eastern aspect across the application site and further along the shared lightwell. This aspect due to the existing built environment is already partially obscured and is further obscured by the large metal escape stair. The existing staircase is not fully enclosed, meaning that some views/light can penetrate through the stair, however, it remains an imposing feature and its removal is welcomed. As a result, these units currently have constrained rear aspects at present due to the existing building arrangement. The existing/proposed sections are shown below;

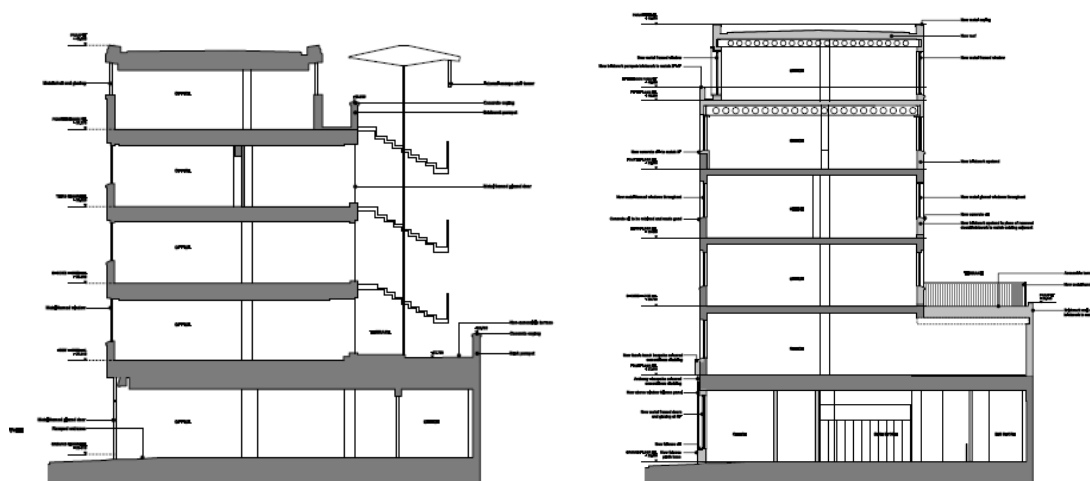


Figure 8: Existing and proposed section

- 10.37 Given the height of the first floor rear extension relative to the rear windows to 158/159, it would not impede rear aspects from flats at 2nd, 3rd or 4th floor level (flats 3-5). The extension would however project in front of the full rear aspect of the first floor units (flats 1 and 2), which feature living rooms and terraces to their rear. This aspect of the works would cause loss of views along the shared lightwell. That said, the proposed extension would still allow these windows views above the extension and as such outlook towards the sky would still be afforded. It is acknowledged that this element of the

proposal would become much more imposing in these rear outlooks than the existing situation. However, the resulting situation of having the external amenity space enclosed to single storey level is not uncommon for a dense urban area such as this and views towards the sky would still be afforded. Whilst the rear amenity space and outlook would become enclosed to a greater degree as a result of the extensions, given the existing situation, this is not considered so severe to warrant a reason for refusal on the basis of loss of outlook / overbearing visual impact. It is also noted that the primary, southern aspect to these units would be unaffected by the development.

8-18 Parker Street

- 10.38 Adjacent to the application site, 8-24 Parker Street runs to the North East and is host to a number of residential units. The property hosts a number of ground and first floor duplex maisonettes such as nos.8 and 10 Parker Street which are adjacent to the site, as well as, nos.18, 20, 22 and 24 which are situated further along Parker Street. A total of six flats then sit above these units within Market House (12-16 Parker Street) which has a shared entrance in the centre of the building, fronting Parker Street. All of the units are dual aspect, with front aspects over Parker Street and rear aspects into the shared rear lightwell of the city block towards the rear of Great Queen Street. Flat 6 (Market House) has also been extended upwards to give it an additional fifth floor mansard.
- 10.39 No part of the proposed development would extend within the front aspect of these properties, meaning that the rear aspect only needs further investigation. In addition, numbers 18-24 Parker Street are situated too far away (+17m) to be adversely affected by the proposed extensions. The existing rear elevations of these affected properties are also shown in the photographs below.



Figure 9 - Rear elevations of no.8/10 Parker Street (left, GF – 1st) and flats above in Flats 1-6, Market House (right, 2nd – 5th) taken from the rear of the application site

- 10.40 The proposed development would not extend directly in front of the rear aspect of any of these units. The proposed development would lead to a

building up of the flank elevation adjacent to a number of windows within this property. The figure below shows the existing and proposed relationship between the property and these adjacent units.

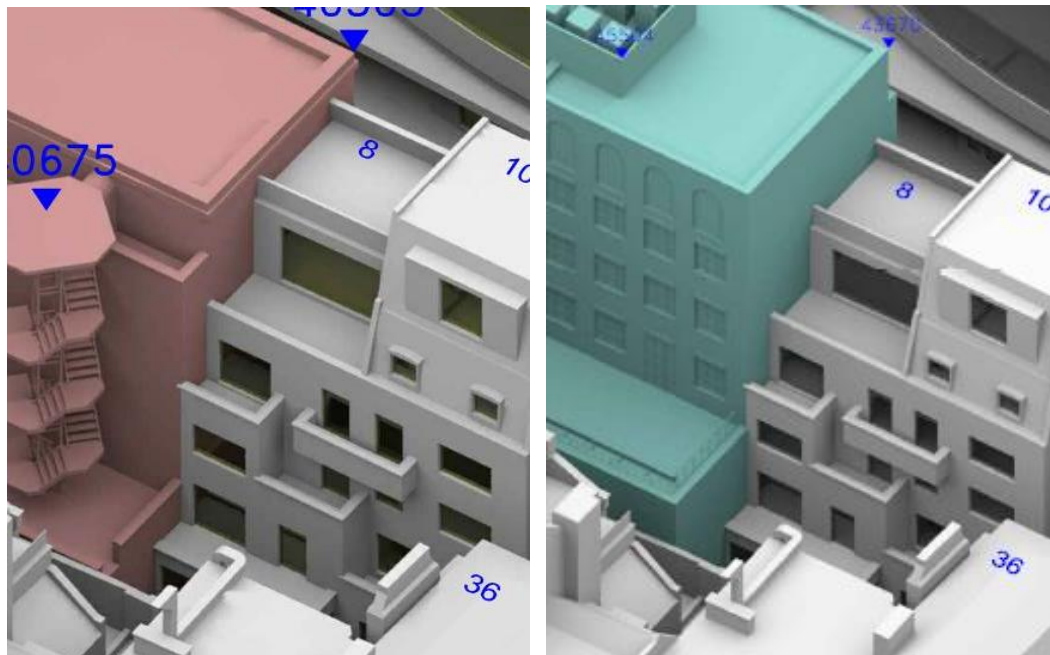


Figure 10: Existing (left) and proposed (right) relationship between site and 8 – 10 Parker Street (GF and 1st floor) and Flats 1-6 (Market House, 12-16) above. 18-24 Parker Street extend off to the right of image

- 10.41 The development would form an upwardly extended flank elevation adjacent to no.8 Parker Street. The flank elevation formed would project at first floor beyond the existing rear elevation along this boundary. This would sit adjacent to an outdoor amenity terrace. In addition the fourth and the fifth floor extrusion of the rear elevation would build up the height of the existing flank in this position enclosing and sitting above the southern termination of the terraces to the top floor flats.
- 10.42 As aforementioned, these additions would be readily visible to these residents and would block oblique views at first floor level and again at upper floor levels by causing additional enclosure to terraces. Notwithstanding this, none of these additions would prohibit the main rear or front aspect from these units, with views only partially being affected. The window affected the most would be the adjacent first floor window to no.8 and terrace at no.8. However, the existing view is towards the rear of 157 Drury Lane and the level of reductions would not be considered to represent a detrimental loss of amenity, given the dense urban setting.

40, 39 and 38 Great Queen Street

- 10.43 In terms of outlook, the final properties to be considered are those along Great Queen Street that host commercial units at ground floor level, with residential accommodation above.
- 10.44 At present, the rear aspects of these units look towards the back of the application site which is already taller by one storey. Whilst some views to the sky are afforded, existing rear aspects do not include any open vistas and this is further impeded by the existing escape stair that sits in close proximity to the rear elevation of no.39. Given the separation distances between main facing rear elevations (+15m), existing relationship and siting of the proposed massing, the additional height to fourth floor and fifth floor roof extension is not considered to represent an imposing addition within these views. In addition, the removal of the staircase would partially improve the existing outlook from rear facing properties.

Privacy

- 10.45 The upwards extensions at fourth and fifth floor level would introduce new windows on the rear elevation facing towards residential properties, however, the location of these windows would be on the same plane as the existing windows to the rear elevation between 1st and 3rd floor levels. Given their separation distance (9m-15.5m) and the difference in height, the addition of these windows to the rear is not considered to cause a detrimental loss of privacy to those units opposing the development (no.40-38 Great Queen Street). Similarly, as views from these windows towards the adjacent 8-10 Parker Street/Market House and 158-159 Drury Lane would be sharply angled down and not dissimilar to existing views, again these properties would not be adversely prejudiced by these windows. It is also noted that the office use is one which tends to have activity through the day, but less so during sensitive evening hours. The first-floor rear extension would not include any windows and as such would not result in any loss of privacy.
- 10.46 As well as new windows, the proposed scheme includes a terrace at second floor level. There is a current terrace/ outdoor area which according to local residents has never been in use for amenity purposes. However, this current situation is not controlled via any prohibitive condition and submitted comments have noted that at times, this area has been used by staff members in the past. The proposed terrace would face the rear windows of *Great Queen Street and would be adjacent to 8 Parker Street*. The proposed terrace would be set in from the boundary and surrounded by iron railings. Nevertheless, the proposed terrace would result in views into the rear windows of 38 and 39 Great Queen Street at first and second floor level. Additionally due to the size of the terrace, may give rise to some loss of privacy to rear windows at first floor level at 8 Parker Street and 158/159 Drury Lane.

- 10.47 It is considered that screening to the terrace can mitigate this impact of loss of privacy. The installation of privacy screening would ensure no afforded views into the rooms of these properties and would safeguard the amenity of future occupiers and ensure their privacy. A condition will be attached to the permission to ensure these details are provided and installed prior to occupation of the building and use of the terrace. Comments relating to the noise from these terraces are discussed in the following noise section.

Noise

- 10.48 In accordance with the requirements of policies A1 and A4, due consideration must be paid to any potential issues of noise and disturbance to residential occupiers in the local area arising from the proposed development.

Use/management

- 10.49 In terms of noise generated from the uses proposed. The use of the office building itself would not give rise to significant levels of noise, particularly with the further safeguard of a condition preventing the playing of music on the premises in an externally audible fashion.
- 10.50 The proposed ground floor alterations make the building more conducive for a range of E-class uses including food and drink. Whilst there is no change of use aspect in this application, such uses that might attract night time comings and goings are highly contentious in this area. The applicant has agreed to a condition imposing an hours of use restriction (Mondays-Saturdays 07.00-22:00hrs; Sundays and Bank Holidays 09:00 -21;00 hrs) on the ground floor commercial premises.

Terrace

- 10.51 As outlined above the proposal would include a roof terrace at second floor level towards the rear of the building facing residential blocks. The potential loss of privacy has been addressed above with the installation of privacy screens to prevent any direct views into residential properties. However due to the close proximity to the residential properties it is considered necessary to limit the use of the terrace to normal office hours of Monday to Friday 9am to 7pm. This is secured by planning condition.
- 10.52 In light of the conditions set out above, it is not concerned that the use of the development would give rise to any issues of detrimental noise or disturbances, or the need for future mitigation measures to be secured.

Plant equipment

- 10.53 A Noise and Vibration Impact Assessment was submitted which assesses the noise impacts associated with the proposed development.

- 10.54 Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, BS 8233 Guidance on sound insulation and noise reduction for buildings, Camden Council's Local Plan, version June 2017 and BS 4142:2014 "Methods for rating and assessing industrial and commercial sound". The submitted plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.
- 10.55 The Noise Impact Assessment has tested the noise emission levels of the proposed plant and predicted the changes in noise levels experienced at the closest sensitive receptor compared to existing background levels. The report seeks to demonstrate that the development would avoid noise from plant and would not give rise to adverse impacts on health and quality of life as a result of new development. The report has been prepared in line with industry standards.
- 10.56 This has been assessed by the Council's Environmental Health (Noise) officers who confirm that they are satisfied with the submitted acoustic assessment and are supportive of the development, subject to the application of conditions. Conditions are attached on noise limits, vibration and sound insulation.
- 10.57 To ensure that the demolition and construction of proposed works are fully considered in relation to the potential impacts upon local residents and businesses, a Construction Management Plan will need to be secured under a s106 legal agreement. This will also include the requirement for a Construction Working Group to be formed during the course of the works. With such extensive mitigation controls in place, it is not considered that the construction works would cause any protected group to be disproportionately affected.

11. CONSERVATION AND HERITAGE

- 11.1 The conservation considerations are as follows :

- Policy review
- Historic development and surrounding townscape
- Summary
- Site and setting
- Proposal and assessment
- Conclusion

Policy overview

- 11.2 Policy D1 of the Local Plan seeks to secure high quality design in development and Policy D2 seeks to preserve and, where appropriate,

enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains and historic parks and gardens

- 11.3 Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the Listed Buildings Act") are relevant with regards to impacts on heritage assets. Section 72(1) requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

Historic development and surrounding townscape

- 11.4 The application site is located within the Seven Dials Conservation Area, wherein the Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in accordance with Section 72 of The Planning (Listed Buildings and Conservation Areas Act) 1990 (as amended).
- 11.5 The nearest listed buildings are situated along the northern side of Great Queen Street to the North East of the site. This includes nos.38, 37- 36 and 30-31 that are grade II as well as 33-35 and 27-29 which are grade II* listed. In addition, on the Southern side of Great Queen Street sits the Grade II* listed Freemasons Hall. The Council has a statutory duty to have special regard to the desirability of preserving a listed building(s) or its setting or any features of special architectural or historic interest which it possesses, in accordance with Section 66 of The Planning (Listed Buildings and Conservation Areas Act) 1990 (as amended).

Site and Setting

- 11.6 The host building was constructed in the mid-1980s as part of the redevelopment of 4-24 Parker Street & 160-161 Drury Lane. The building's architecture is of its time, being dressed in buff brick with contemporary references to 19th century warehouse and wharf typologies. The development was formed of two distinct elements, the taller commercial building on the corner with Drury Lane (application site) and the lower residential element further along Parker Street which features 4-5 storeys (plus mansards) but it is more domestic in character. The CA statement considered the existing building to make a neutral contribution to the character of the area.

Proposal and Assessment

- 11.7 Given its prominent corner siting, the proposed additional storeys to the host building are not considered to overwhelm the streetscape or townscape hierarchy. The building sits between taller corner buildings of 157 Drury Lane to the South and the theatre to the North and attempts to bridge this divide

whilst also respecting the changing context between Drury Lane (taller building, more commercial character) and Parker Street (more domestic in character and scale).

- 11.8 A seven storey building has already been recently granted permission on the same site and the principle of that height has been established under planning ref 2019/2095/P, although the acceptability of the height would always be subject to massing, form and materials. However, the massing, form and materials of the scheme as currently proposed are not considered to harm the character and appearance of the conservation area.



Figure 11: 2019 consented scheme and the proposed scheme

- 11.9 The proposed scheme retains the existing brick façade and extends it up by one additional floor. The existing render band is removed and a new base is introduced which extends to the underside of the first floor windows. At ground floor level the windows would be punched into the façade with deep reveals and new faïence panels creating a characterful street level presence. The faïence panels extend up the corner of the building adding a simple accent to the corner. New Crittall style metal windows are provided throughout creating a strong warehouse aesthetic across the whole façade which is welcomed.
- 11.10 At roof level the new fifth floor would be tiled and follows the profile of the building below. The windows on the corner have been unified vertically across two floors creating a subtle nod to the local warehouse characteristics, highlighting the importance of the corner in the surrounding context.
- 11.11 At street level the faïence panels and deep window reveals to the façade adds interest and there is improved hierarchy of entrances to assist with legibility. It is unfortunate that the pillars to the ground floor are being over clad as they add a robust and distinctive character. However, the antisocial

behaviour issues that have been associated with this element of the existing building design are acknowledged. Nevertheless, the detailed design of the ground floor façade along with the remainder of the building creates a heavy, robust character that typifies a successful warehouse façade.



Figure 14: Existing and proposed façade

- 11.12 The proposed materials are considered to enhance the existing building and create an interesting and sympathetic addition to Drury Lane, Parker Street and the surrounding conservation area. Finally, the proposed rear extension would remove the existing staircase which is visually obtrusive. The rear extension would not be visible from anywhere other than the private rear views from surrounding properties. There are also a number of first and second floor rear extensions to properties within the block, the extension is not considered to harm the character of the host building or conservation area.
- 11.13 This architectural treatment of the building is seen as a well-considered response to the existing site context and character of the local area. Whilst clearly expressing itself in a contemporary idiom, the design is considered suitably reflective of and sympathetic to the range of established building typologies in the conservation area and would allow for the existing building to offer a much stronger and positive presence in the streetscene. The design has appropriately considered and been informed by local character and has the potential to enhance the character of Drury Lane. However, given the refined but simplified elevational treatment the overall success of this scheme will inevitably depend upon the quality of the final detailing. Notwithstanding, given the importance of these elements it is still considered necessary for a number of details to be reserved by condition. It is also considered necessary to ensure that the project architects are retained, or that any reappointment is first approved by the Council in order to ensure the highest standard of design is maintained.
- 11.14 In view of the above it is considered that the proposed extensions and alterations will preserve the existing character and appearance of the Seven Dials Conservation Area.

12. SUSTAINABILITY AND ENERGY

- 12.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.
- 12.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.
- 12.3 Local Plan policy CC2 expects non-residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.

Energy and carbon reductions

- 12.4 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2) and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).
- 12.5 The applicant has provided an Energy and Sustainability Statement with their application. This sets out the ways in which the development will reduce carbon emissions and increase the energy efficiency of the building.
- 12.6 The statement notes that the proposed energy strategy follows the energy hierarchy: Be Lean, Be Clean, Be Green. This report includes a robust and thorough justification for the measures included at each stage and models that the Be Clean, Be Lean, Be Green process will achieve an overall 48% improvement on the notional existing building, and a 30% reduction between the Baseline and Be Lean stages alone. The Council's Sustainability Officer has assessed the application and is satisfied with the carbon assessment. The statement and carbon savings outlined are welcomed, particularly in view of the floorspace category this application falls within which does not have specific energy targets to meet.
- 12.7 As well as assessing energy demands and measures, the submitted report also includes an indicative BREEAM Pre-Assessment to demonstrate the sustainability performance of the proposed building. This predicts that the new building would achieve a BREEAM 'Excellent' rating (with a minimum of 70% required for an 'Excellent' rating). In addition, targets by 'type' (i.e. energy, water and materials) all exceed the policy requirements

- 12.8 In order to ensure that the final construction delivers upon these predictions and that the carbon saving measures are monitored and maintained, an obligation for a Sustainability Plan to include BREEAM Excellent rating shall be secured through the legal agreement.
- 12.9 Finally, in order to test the potential impacts to local air quality and to test for risks for future users of the site, an Air Quality Assessment has been provided. The assessment demonstrates that despite its central location, the development can be controlled to avoid any adverse impacts to air quality. During the construction works, a range of best practice mitigation measures are set out to reduce dust emissions and ensure that the overall effect will be 'not significant'. Such measures will be secured through the CMP obligation. Once constructed, the report demonstrates that users of the site will experience acceptable air quality and that its operation would produce insignificant impacts on existing sensitive receptors. In order to ensure that non-road mobile machinery used during construction meets stipulations in terms of emissions, a condition is recommended. The development is therefore considered to comply with policy CC4 (Air quality).

13. TRANSPORT

- 13.1 The following transport considerations are covered below:
- Policy review
 - Site location
 - Cycle parking & Car parking
 - Construction management
 - Deliveries and servicing
 - Highway works
- 13.2 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.
- 13.3 Policy T3 seeks improvements to transport infrastructure in the borough; and Policy T4 promotes the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.

Site location and access to public transport

- 13.4 The site is located in the Central London Area and the Council is the highway authority for these roads and is therefore responsible for their maintenance. The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). Holborn (London

Underground) and Tottenham Court Road (London Underground and Elizabeth Line) stations.

Car parking

- 13.5 The development should be secured as Business parking permit (car) free by means of a Section 106 Agreement. This arrangement was previously secured against the approved scheme. This will prevent the future occupants from adding to existing on-street parking pressures, traffic congestion and air pollution, whilst encouraging the use of more sustainable modes such as walking, cycling and public transport.

Cycle parking

- 13.6 The applicant is proposing to provide 22 long stay spaces in the form of two tier racks and 1 non-standard cycle space in a Sheffield stand in a cycle store on the ground floor. This would be accessed via a wide doorway on Parker Street. Showers and a drying room would also be provided. The provision of the 22 cycle parking spaces should be secured by condition. Existing cycle parking for visitors is provided in the form of 3 M-shaped stands on Drury Lane outside the front of the site, whilst a TfL cycle docking station is located just to the south of this on Drury Lane.

Travel Plan

- 13.7 A draft travel plan has been submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. This will need to be updated prior to occupation (not commencement) once a clearer view of the future occupants is available. The Travel Plan and associated Monitoring and Measures Contribution of £5,196 should be secured by means of the Section 106 Agreement.

Servicing

- 13.8 The proposed development is expected to lead to a minor increase in servicing at the development, but the increase in delivery numbers is not expected to be excessive. Given that the site is serviced on-street at present from the loading bay on Parker Street and there are no proposals to alter this arrangement, it is considered that a Servicing Management Plan is not a policy requirement for this development. A Service Management Plan has however been submitted which is welcomed and will ensure that the development continues to be serviced with minimum impact to other road users or noise to disruption to neighbouring residents. The applicant has agreed to accept a condition to accord with the submitted SMP.

Pedestrian, cycling and environmental improvements

- 13.9 The proposed development would generate an increase in multi-modal trips to and from the site on a daily basis. The Council's transport policies are geared towards encouraging and promoting active travel (i.e. walking and cycling). The Council therefore seeks to secure a Pedestrian, Cycling and Environmental (PCE) improvements contribution by legal agreement if planning permission were approved in principle. This would be used by the Council alongside similar contributions secured from other major developments to transform the public realm in the local area for the benefit of cyclists and pedestrians, and to improve road safety for all road users in and around the site.
- 13.10 Given the uplift in trips and activity at the site, a Pedestrian, Cycling and Environmental improvements contribution of £13,500 should be secured by means of the Section 106 Agreement. This would be used towards providing improved pedestrian and cyclist facilities in the vicinity of the site.

Construction management

- 13.11 Construction management plans are used to demonstrate how developments would minimise impacts from the movement of goods and materials during the construction process (including any demolition works).
- 13.12 Given the Central London location of the site and its proximity to a number of residential properties and the theatre on the opposite side of Parker Street, it is recommended that a Construction Management Plan and associated Implementation Support Contribution of £4,075.60 and Impact Bond of £7,874 be secured by means of the Section 106 Agreement. This will help ensure that the development is carried out without unduly affecting neighbouring amenity or the safe and efficient operation of the local highway network, in accordance with Policy A1 of the Camden Local Plan. A draft CMP has been submitted in support of the application but this will need to be updated once a principal contractor has been appointed and submitted for approval prior to works commencing on site. As with the approved scheme, given the proximity of neighbours and the level of interest from local groups, including the CAAC, it is recommended that a Construction Working Group be set up to oversee the CMP process and provide feedback to the developer as the scheme progresses.
- 13.13 In addition to the CMP, a further transport obligation will be necessary to secure a highways contribution to cover the cost of repairing any damage to the public footway caused during construction. In line with the previously approved scheme, this should be £7,502.61.

14. REFUSE AND RECYCLING

- 14.1 Policy CC5 and Camden Planning Guidance Design are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.
- 14.2 The proposals would include a dedicated commercial refuse store towards the rear of the site at ground floor level with direct access to Parker Street. This would contain sufficient space for the storage of both waste and recycling. This provision would be considered acceptable and to accord with the Council's design guidance.
- 14.3 A condition is recommended to ensure that the waste and recycling facilities are provided prior to the first occupation of the building.

15. PLANNING OBLIGATIONS AND COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 15.1 The following heads of terms and contributions are required to mitigate the impact of the development upon the local area, including on local infrastructure.

Obligation
Employment and training
Car free development (commercial)
Construction Management Plan plus monitoring fee £4,075.60
Impact Bond of £7,874
Construction Working Group
Energy efficiency and Sustainability Plan
Highways contribution in case of damage £7,502.61
Payment in lieu of affordable housing contribution £202,500
Retention of project architects
Pedestrian, Cycling and Environmental improvement contribution- £13,500
Travel Plan and associated Monitoring and Measures Contribution- £5,196

- 15.2 The proposal will be liable for the Mayor of London's CIL. Camden is in charging Zone 1 where the Mayoral CIL rate is £50/sqm. The proposal will also be liable for the Camden CIL. The application site is in charging Zone A. The Camden CIL rate for office development in Zone A is £45/sqm. CIL payments will be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment. CIL charges are subject to indexation in line with the construction costs index.

16. CONCLUSION

- 16.1 The office uplift is considered appropriate for the building and in a suitable location. The lack of provision of housing on-site has been satisfactorily justified, and a fully policy compliant payment in lieu would instead be paid to help fund the provision of affordable housing in the Borough. The proposal is considered to be acceptable in terms of heritage and design considerations, including the impact on the Bloomsbury Conservation Area and nearby listed buildings.
- 16.2 Due to the extent and positioning of the proposed extensions in relation to surrounding residential properties, the development would not be considered to result in any detrimental loss of outlook given the existing context. Subject to securing conditions for screening and limiting of hours of use of the terrace adjacent to Parker Street, the scheme would similarly not result in any undue loss of privacy for surrounding occupiers. The development would cause a few instances of windows to breach BRE guideline criteria in relation to daylight. However, when considering the existing urban context and the mostly very low absolute daylight losses incurred, these impacts are not considered to result in excessive levels of harm.
- 16.3 The proposed uses do not result in issues of noise and disturbance to local residents with the various measures recommended, including conditions limiting the commercial unit opening hours. Similarly, noise measures for the new plant equipment outlined in submitted reports will be secured to ensure that plant remains duly attenuated for noise and vibrations.
- 16.4 Taking account of the policies of the development plan and all the material planning considerations the proposals would deliver additional employment floorspace in a central location where such growth can be sustainability accommodated as well as a range of other benefits such as improving the longevity and sustainability of the existing building. The development is consequently considered to be in accordance with the development plan and therefore recommended to be approved.

17. RECOMMENDATION

17.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:

- Employment plan (local procurement, STEAM and construction recruitment through Kings Cross Construction Skills Centre)
- Car Free Development (Commercial)
- Construction Management Plan plus Monitoring Fee and Impact Bond and Construction Working Group
- Energy Efficiency And Sustainability Plan – BREEAM excellent targeted
- Highways Contribution In Case Of Damage
- Payment In Lieu Of Affordable Housing Contribution
- Retention Of Project Architects
- Pedestrian, Cycling And Environmental Improvements Contribution
- Travel Plan (to be updated post commencement and prior to occupation) and associated monitoring and measures contribution.

18. LEGAL COMMENTS

18.1 Members are referred to the note from the Legal Division at the start of the Agenda.

19. CONDITIONS

1	<p>Three years from the date of this permission This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings The development hereby permitted shall be carried out in accordance with the following approved plans and documents:</p> <p>P001/-; P099/-; P100/-; P101/-; P102/-;P103/-; P104/-; P105/-; P106/-;P120/-;P121/-; P122/-; P123/- P124/-; P130/-; P131/-; P199/-;P200/-;P201/-; P203/-; P204/-; P205/-; P206/-; P207/-; P401/-; P402/-; P404/-; P500/-; P202/A; P403/A; P501/A; P400/A; Design and Access Statement dated May 2023 prepared by Ben Adams Architect; Air quality assessment dated May 2023 prepared by Air Quality Consultants; Breem Pre Assessment dated 04/05/2023 prepared by Caldwell Group; Circular Economy and Whole Life Cycle Analysis Statement dated 16/05/2023 prepared by Caldwell Group; Energy and Sustainability Report dated 31/05/2023 prepared by Caldwell Group; GLA Carbon Emissions Reporting Spreadsheet; WLC GLA Spreadsheet; Outline Structural Statement dated 12/05/23 prepared Ian Black Consulting LTD; Environmental Noise Assessment prepared Acoustics Plus; Construction/Demolition Management Plan; Statement of community involvement dated MAY 2023 prepared by McAleer and Rushe; Daylight and sunlight report dated MAY 2023 prepared by Point 2 Surveyors Limited; Town Planning Statement dated May 2023 prepared McAleer & Rushe Contracts UK Ltd; Residential Assessment prepared by Ben Adams Architects; Servicing & Deliveries Management Plan (SDMP) dated May 2023 prepared by Transport planning and highway solutions; Transport Statement dated May 2023 prepared by Transport planning and highway solutions; Travel plan dated May 2023 prepared by Transport planning and highway solutions; Ventilation Strategy Statement dated April 2023 prepared by Caldwell</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Before the relevant part of the work is begun, detailed drawings or samples of materials as appropriate, in respect of the following shall be submitted to and approved in writing by the local planning authority. Submitted details shall include elevations and sections (and where appropriate materials) at 1:10 of the following:</p> <p>a) Full details of proposed roof extension including parapet junction (plans, elevations and sections @1:20);</p>

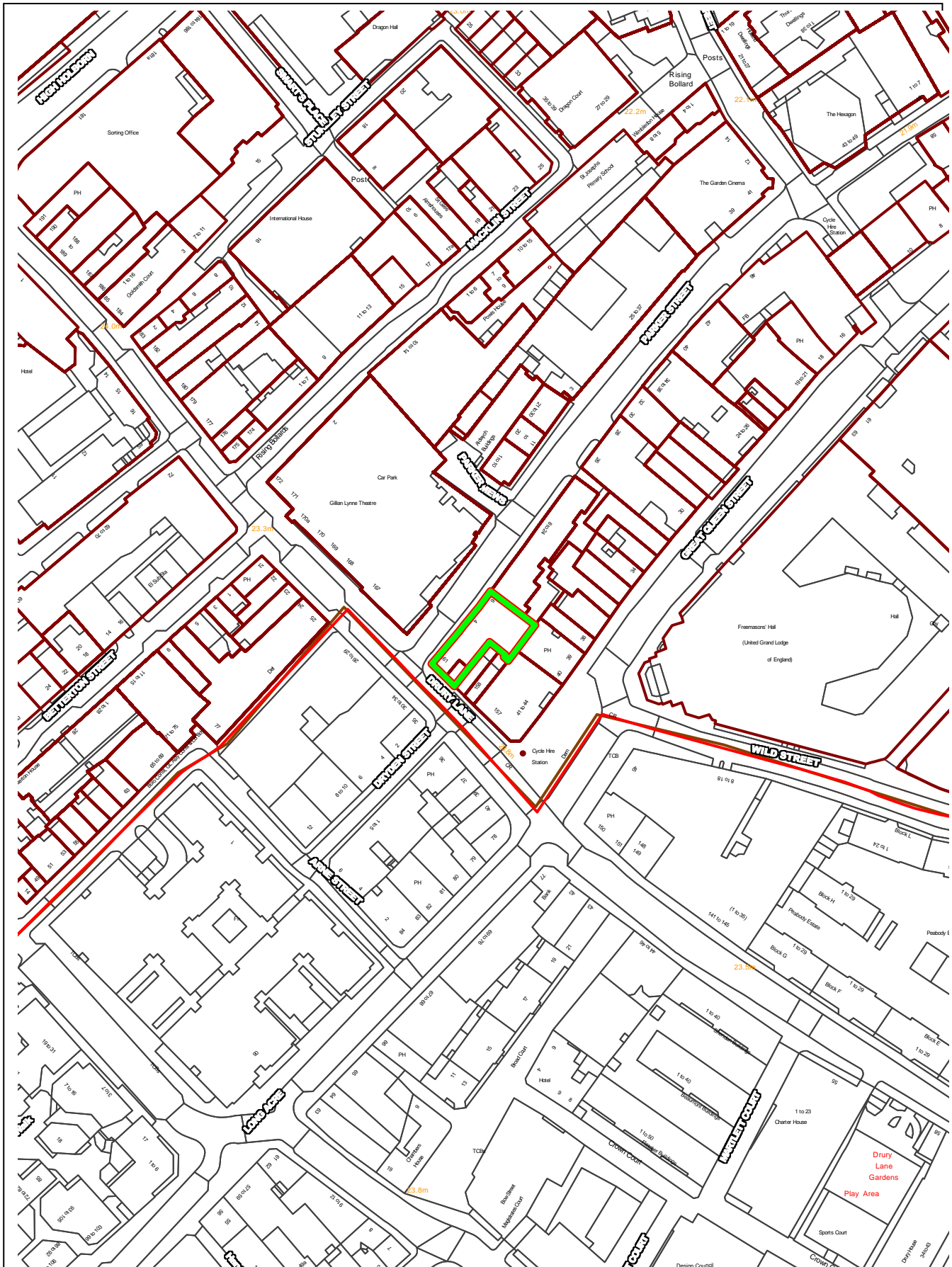
	<p>b) Materials sample for roof extension;</p> <p>c) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10;</p> <p>d) Sample panel of the proposed brickwork (including main building and chamfered set-backs) to show type, colour, bond, mortar mix, joint and pointing to be provided on site;</p> <p>e) Sample panel of perforated metalwork and reconstituted stonework to be provided on site;</p> <p>f.) Details of the retail shopfront at a scale of 1:20 to include windows, doors and fascia area</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
4	<p>All servicing shall take place in accordance with the approved serving management plan.</p> <p>Reason: To avoid obstruction of the surrounding streets and to safeguard amenities of adjacent premises in accordance with the requirements of policies A1, A4, TC2 and T4 of the London Borough of Camden Local Plan 2017.</p>
5	<p>No music shall be played on the premises in such a way as to be audible within any adjoining premises or on the adjoining highway.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, CC1, D1, A1, A4, TC1 and TC2 of the London Borough of Camden Local Plan 2017</p>
6	<p>The ground floor commercial unit fronting Drury Lane hereby permitted shall only be operated between the following times: Mondays-Saturdays 07.00-22:00hrs; Sundays and Bank Holidays 09:00 -21:00 hrs.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, A1, A4, TC1 and TC2 of the London Borough of Camden Local Plan 2017.</p>

7	<p>The refuse and recycling storage facilities as shown on the ground floor plan hereby approved shall be provided prior to the first occupation of the development and permanently retained thereafter.</p> <p>Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
8	<p>The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
9	<p>Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
10	<p>No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).</p> <p>Reason: To ensure that air quality is not adversely affected by the development in accordance with policy CC4 of the Camden Local Plan 2017.</p>

11	<p>No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.</p> <p>Reason: To ensure the proposed works do not detrimentally affect underground sewerage utility infrastructure in accordance with policy CC3 of the Camden Local Plan 2017.</p>
12	<p>Prior to the first use of the 2nd floor roof terrace, details of a privacy screen set back in line with the balustrade of this terrace as indicated on the approved second floor plan and to a height of at least 1.8 metres, shall be submitted to and approved in writing with the Local Planning Authority. The roof terrace shall not be used or accessed, other than for emergency egress, until the approved privacy screen has been fully installed and the approved privacy screen shall thereafter be retained for the duration of the development.</p> <p>Reason: In order to prevent unreasonable overlooking of neighbouring residential premises in accordance with policy A1 of the Camden Local Plan 2017.</p>
13	<p>The second floor roof terrace at the rear of the development shall only be accessed from 9am to 7pm, Mondays to Fridays.</p> <p>Reason: In order to safeguard surrounding residents from noise and disturbance in accordance with policy A1 and A4 of the Camden Local Plan 2017.</p>
14	<p>Before the development is occupied the 22 cycle parking space storage facility shall be fully provided in its entirety as shown on the approved ground floor plan, and permanently retained thereafter.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.</p>

20. INFORMATIVES

1	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
2	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
3	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
4	<p>Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.</p>
5	<p>A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.</p>



Application No: 2023/2245/P

**160-161 Drury Lane
London WC2B 5PN**

**Scale:
1:1527
Date:
22-Dec-23**



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Planning Committee

December 2024

2023/2245/P

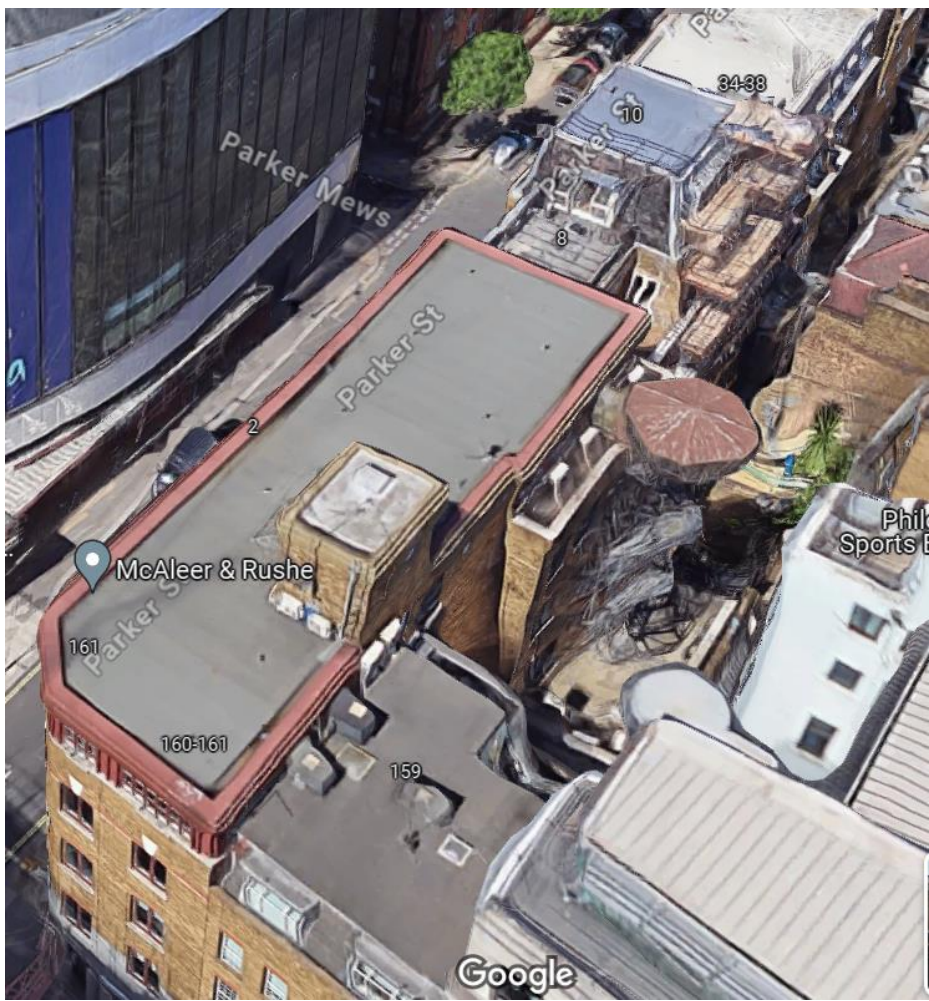
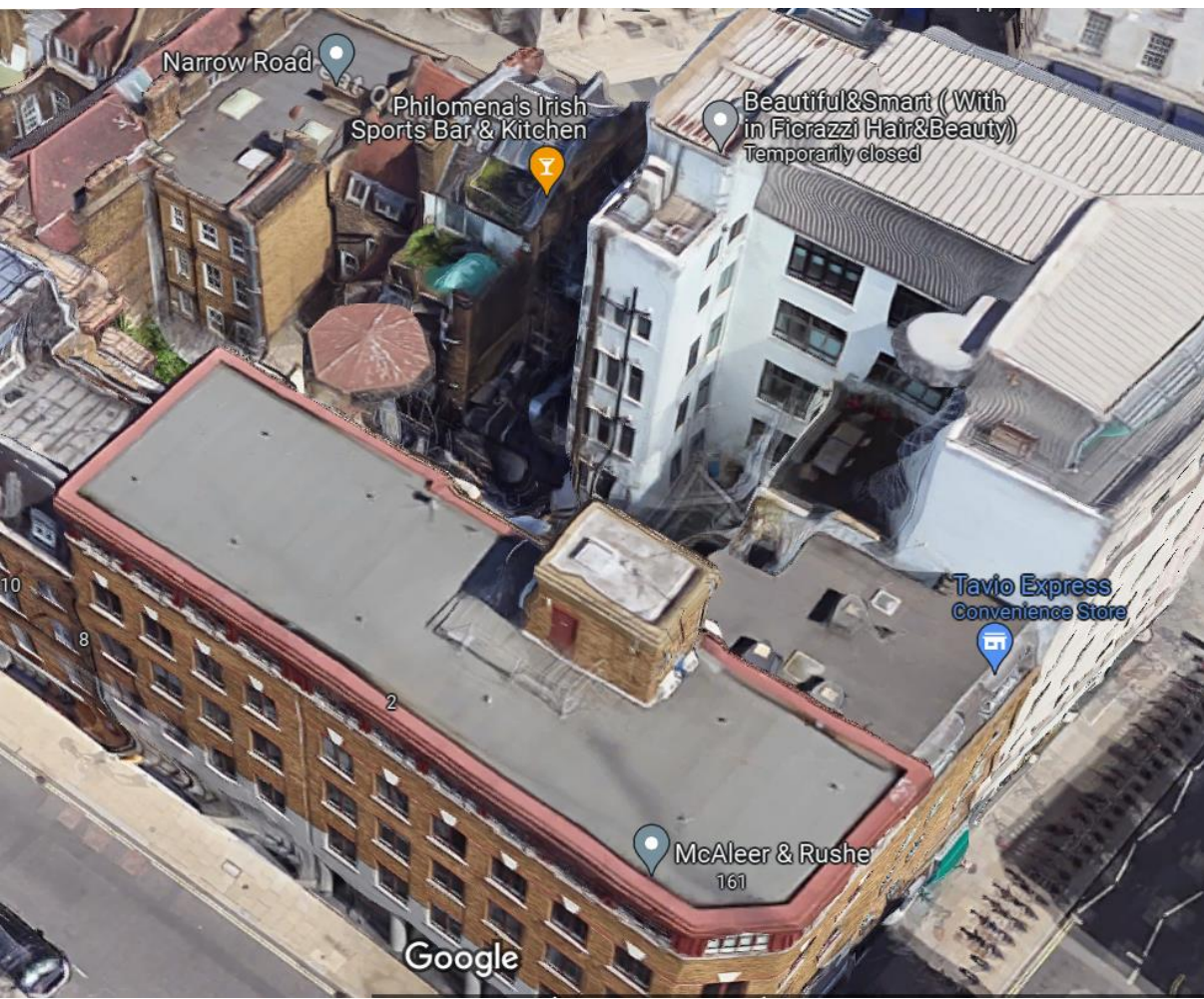
160-161
Drury Lane
London
Camden
WC2B 5PN



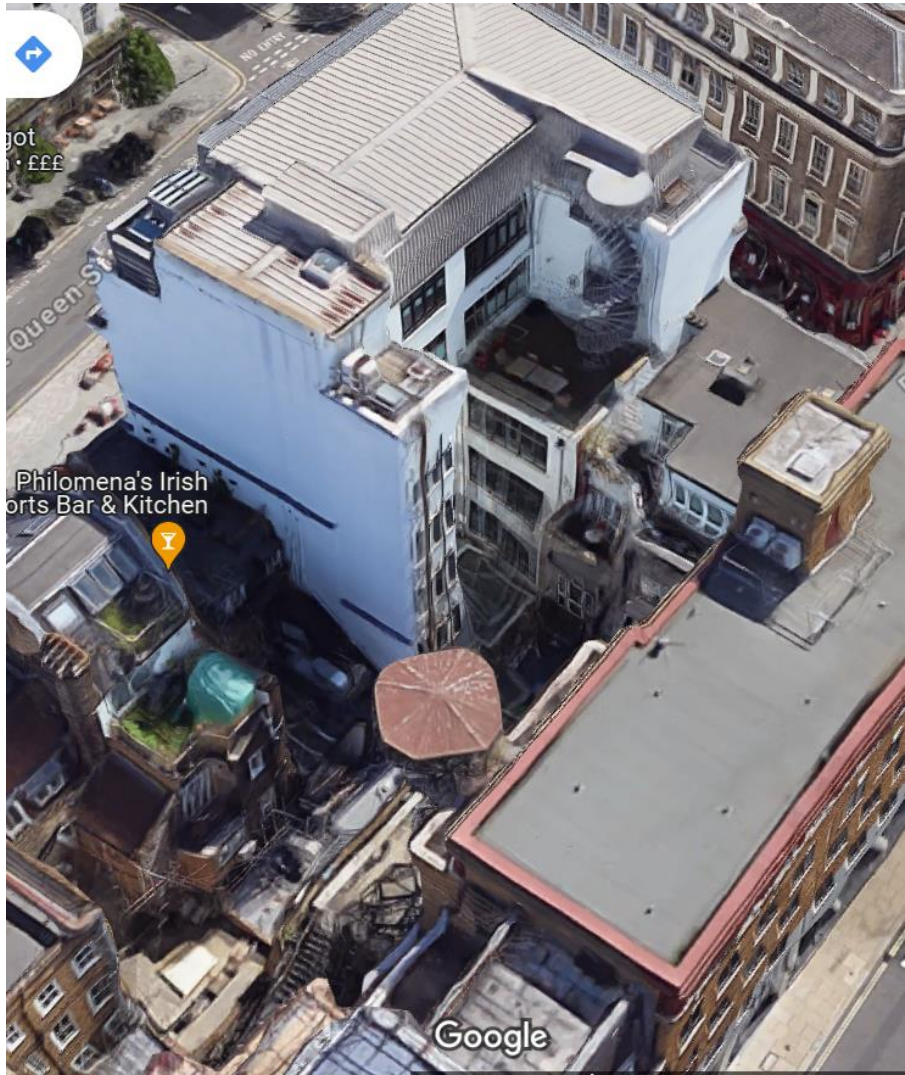
Existing Drury Lane and Parker Street frontages



Site and surroundings from the west and south



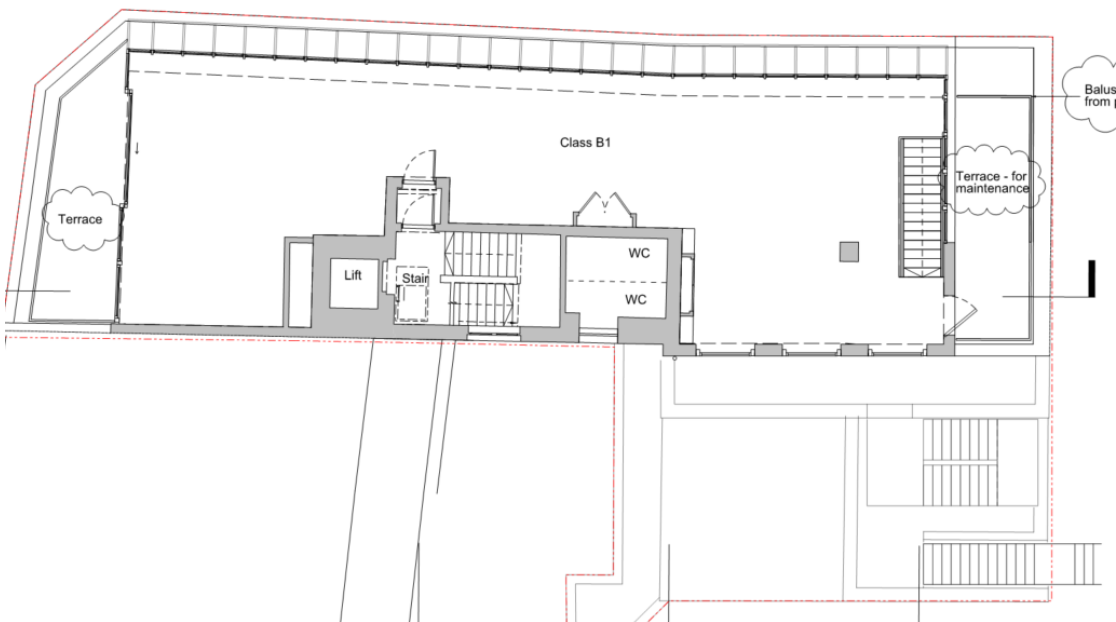
Site and surroundings from the east and north



Neighbouring residential premises



Plate 04 – Plan showing residential (aqua), non-residential (dark blue) and surrounding the Existing Site (orange)



- Site Boundary
- Extent of Brick Type
- Brick Type Tag

Scale 1:100

Revisions
P2 Describing brick types 07/06/19

Client
Eli Investments
Project
160-161 Drury Lane
Drawing Title
**Proposed
Elevation 3
Rear Elevation**

Drawing Number
1468 (PL)262

Scale	1:100 @ A3	Status	Planning
Drawn by	NB	Date	25/02/19

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Section- Existing, previously consented scheme and Proposed

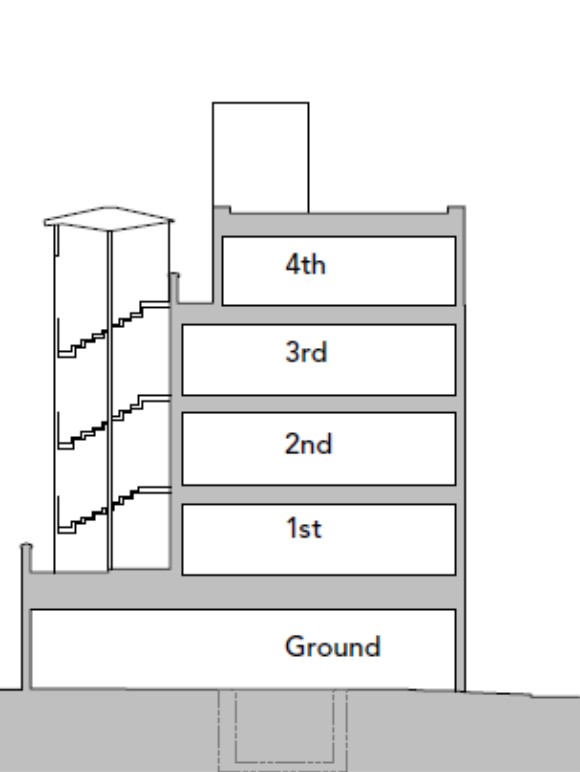


FIGURE 1

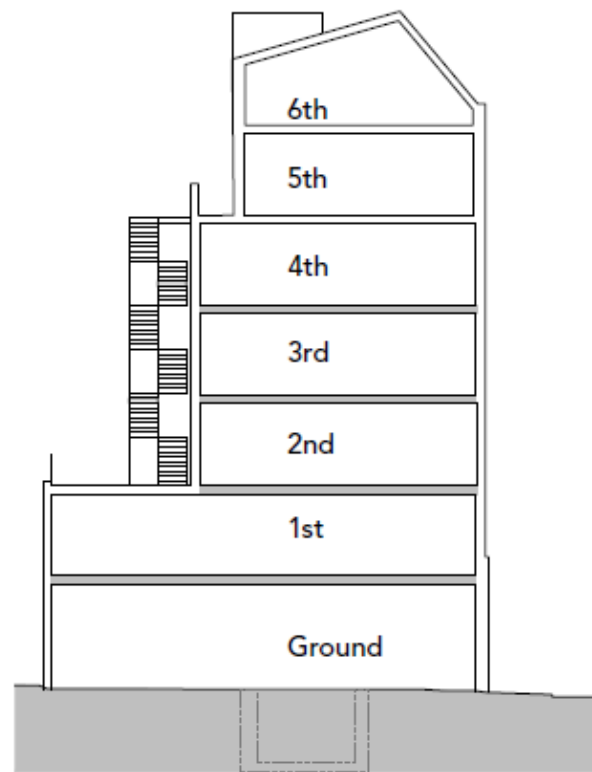


FIGURE 2

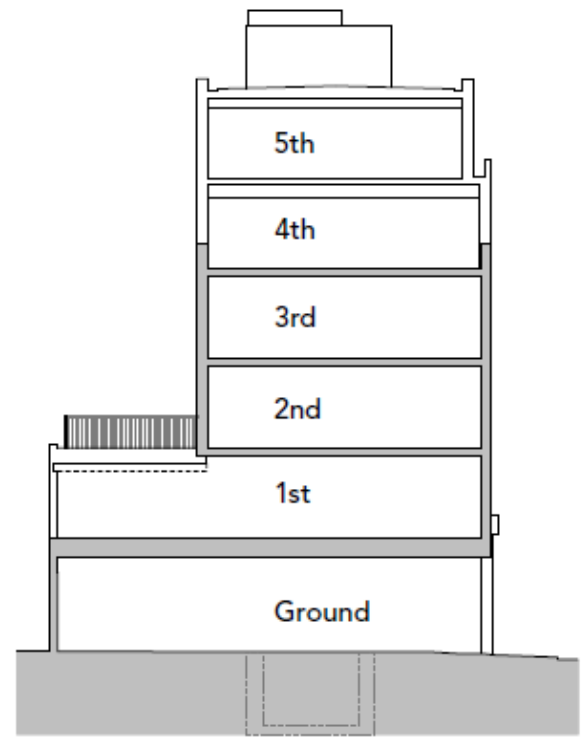
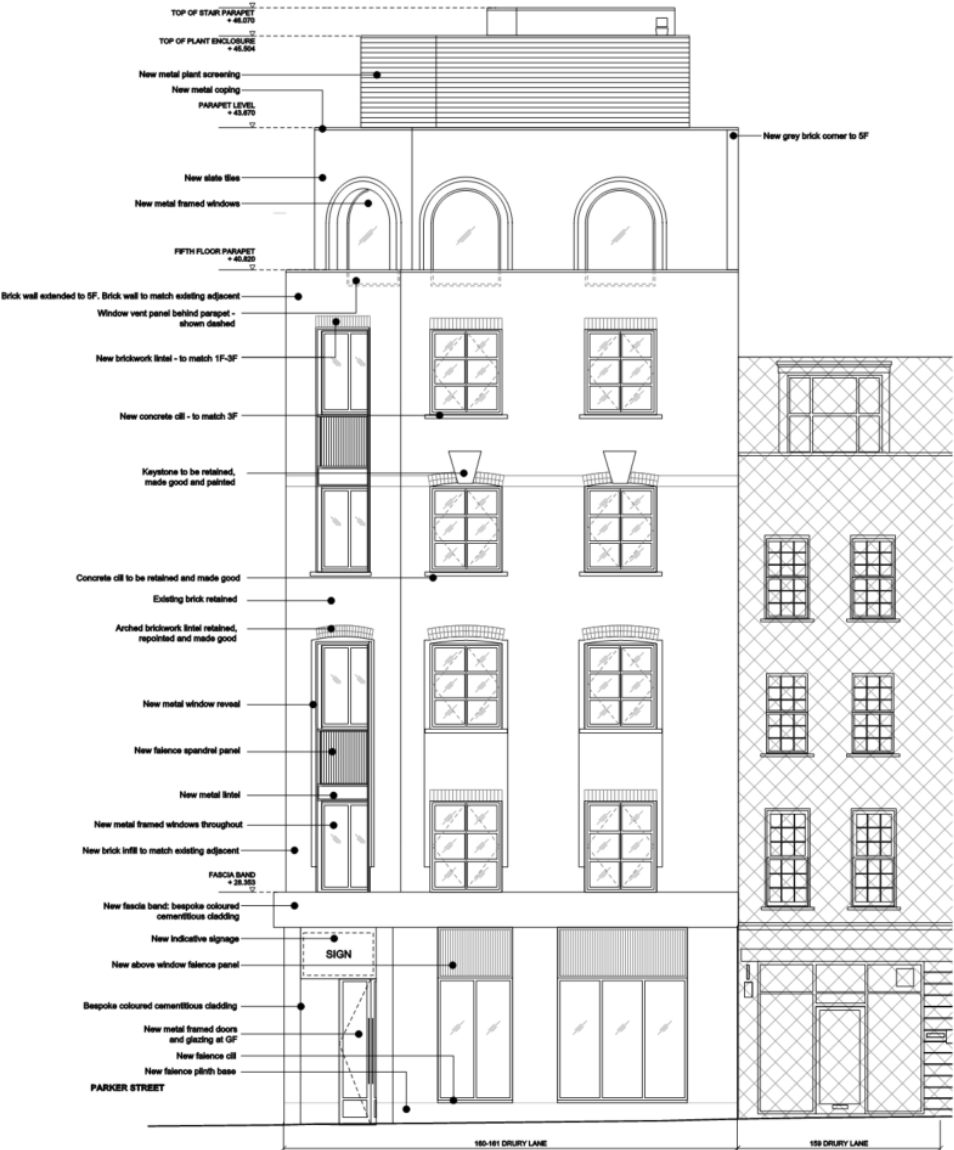
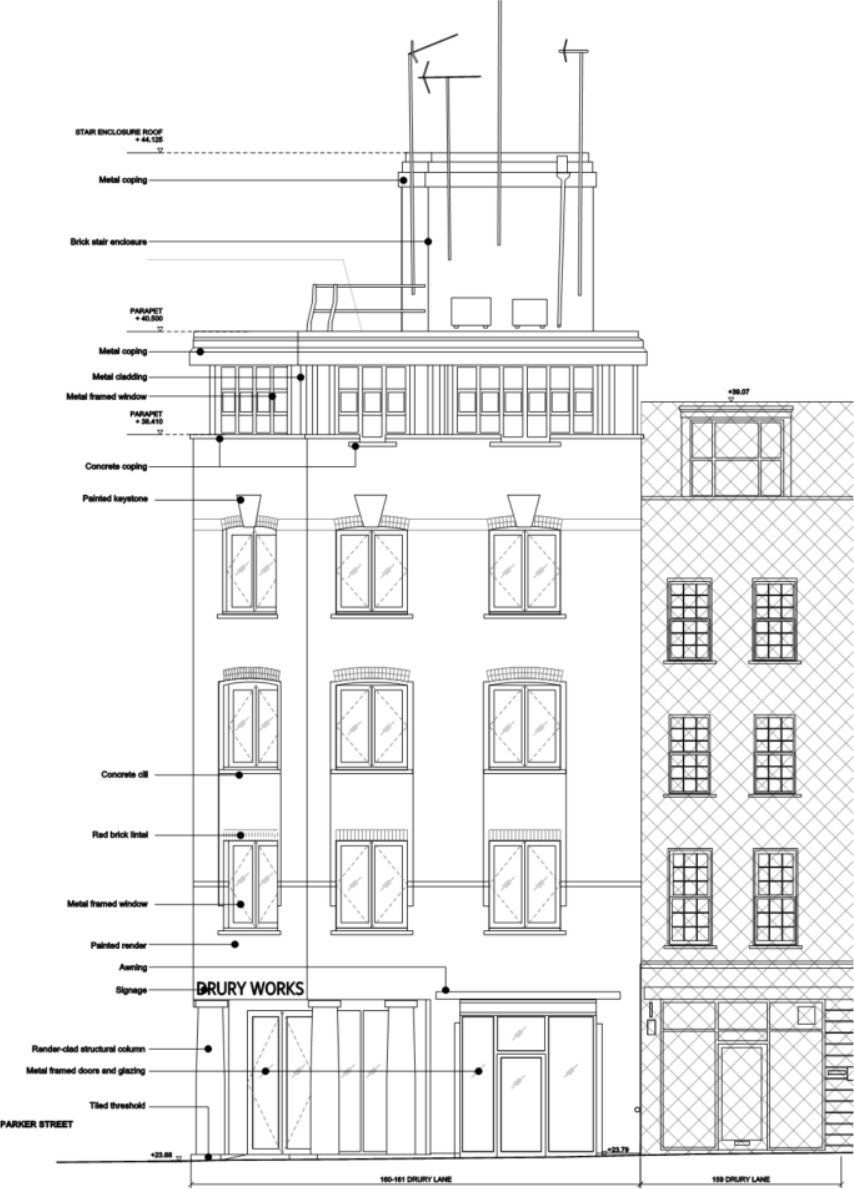


FIGURE 3

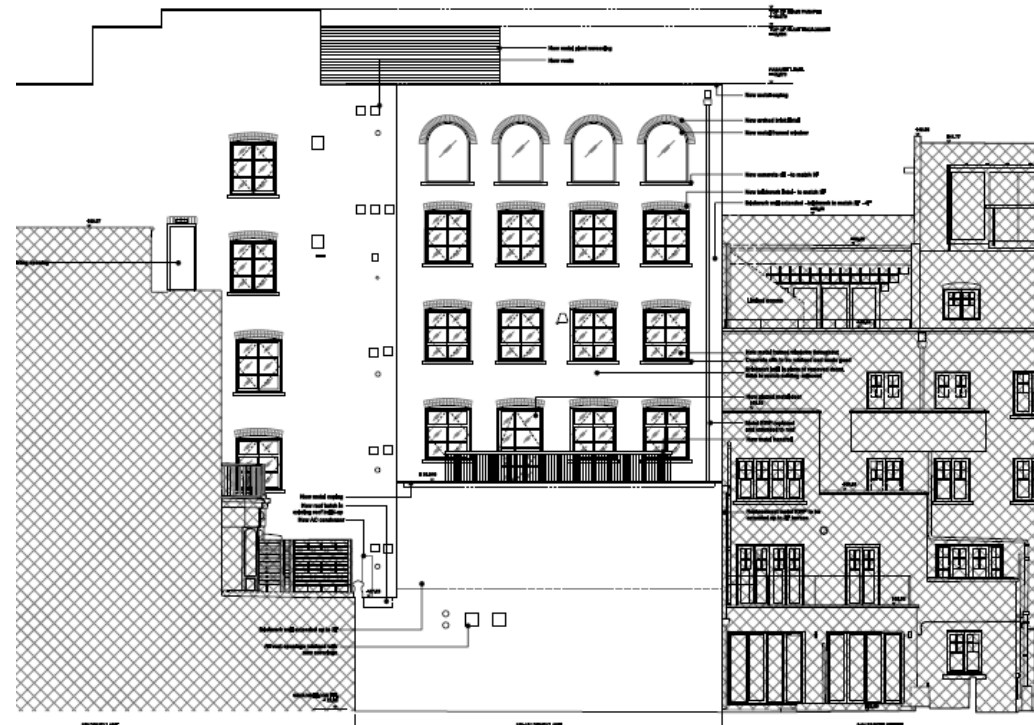
Existing and proposed Front Elevation Parker Street



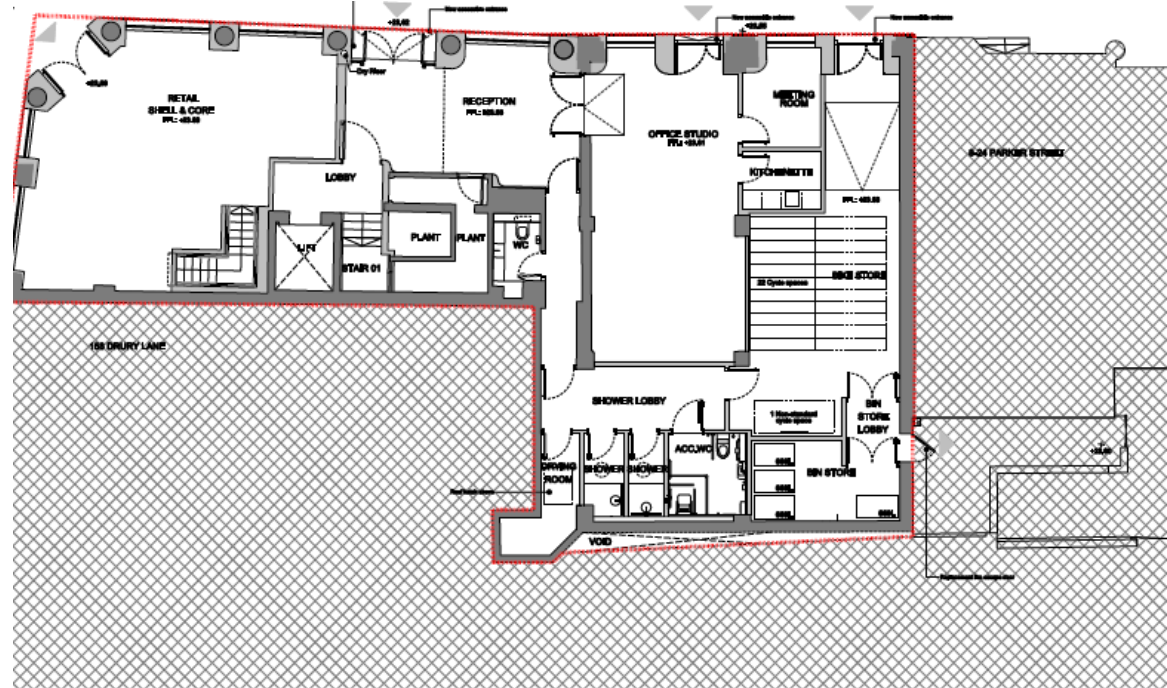
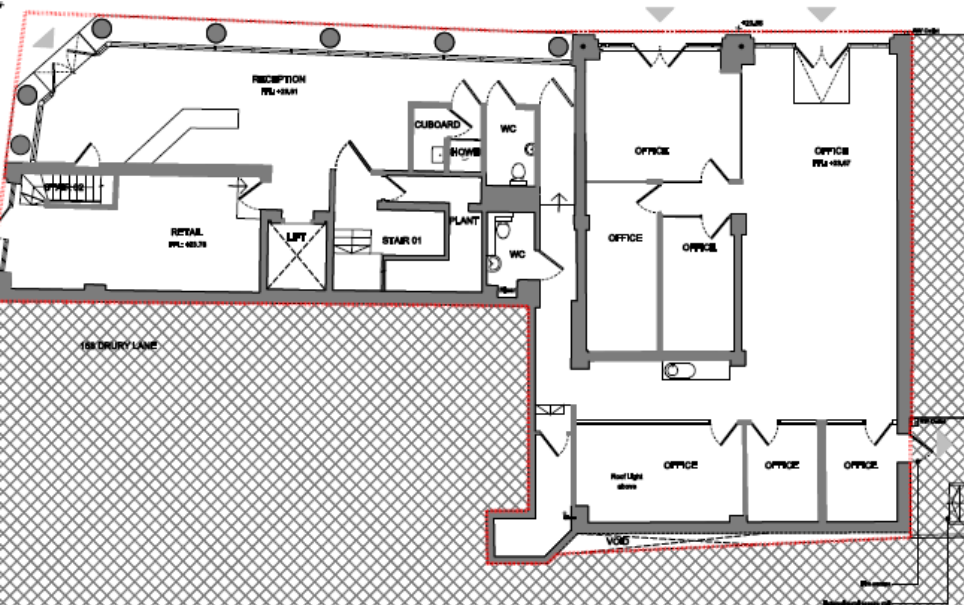
Existing and proposed Drury Lane elevation



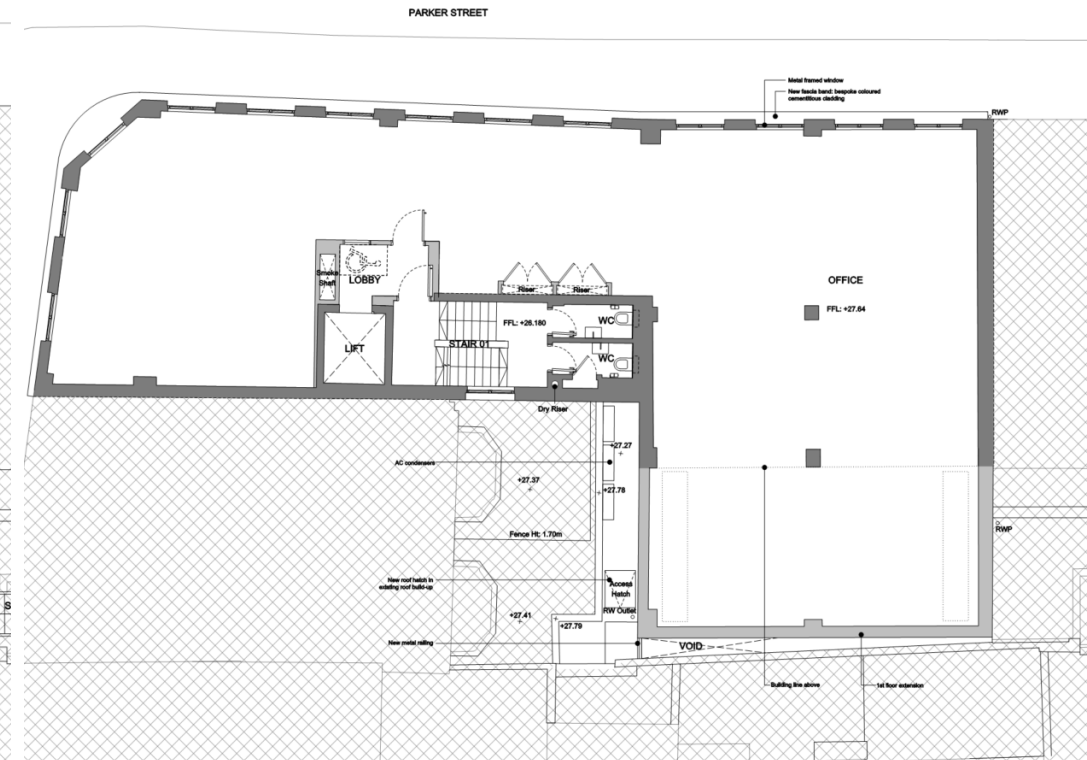
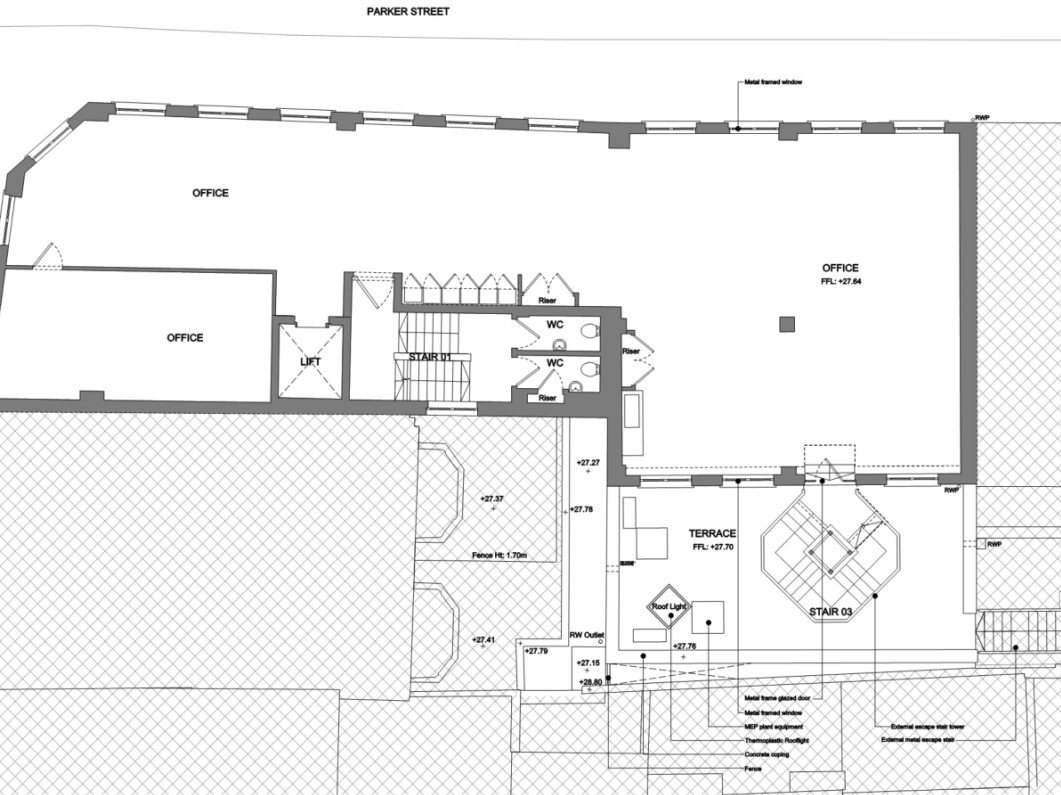
Existing and proposed rear elevation



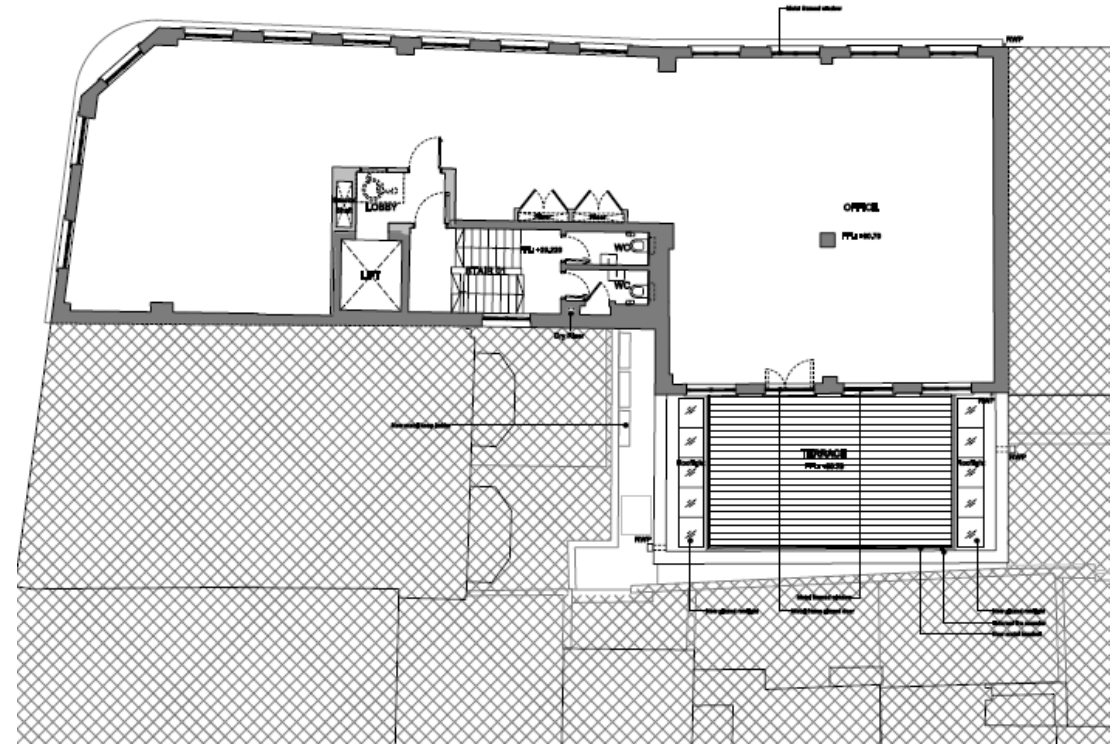
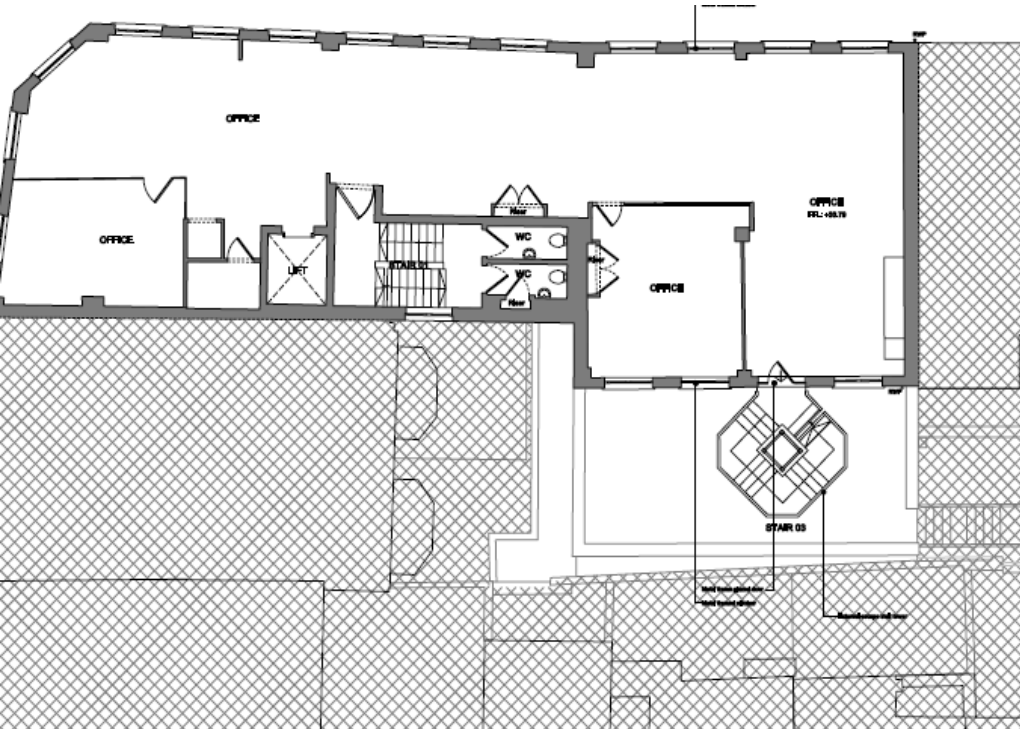
Ground floor plan- Existing and Proposed



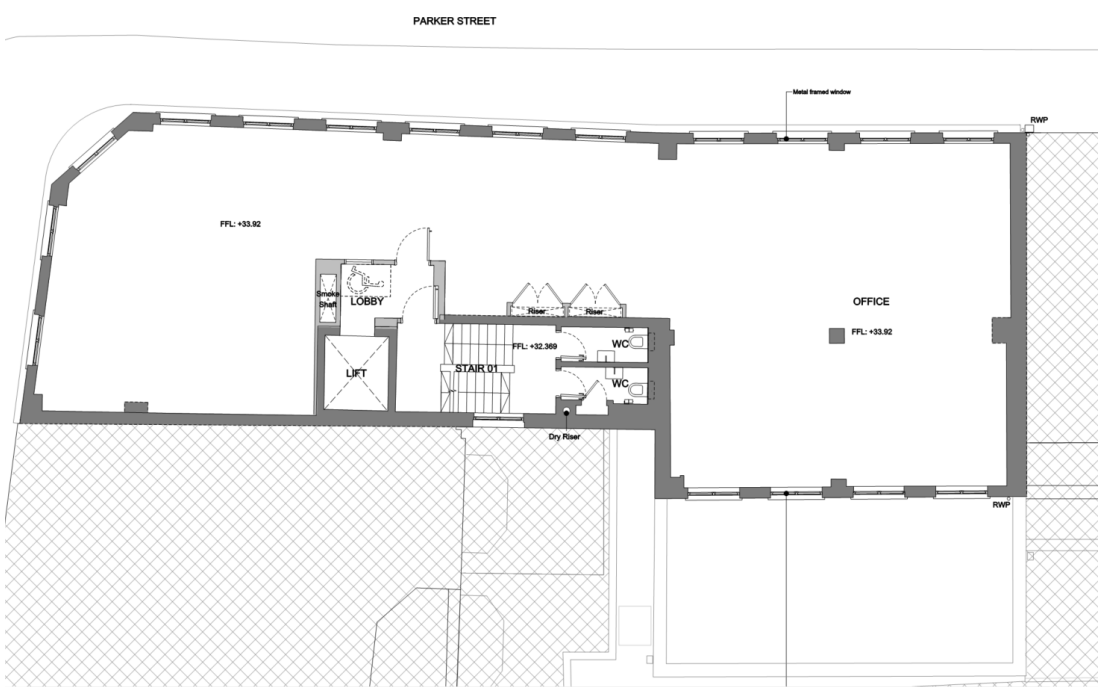
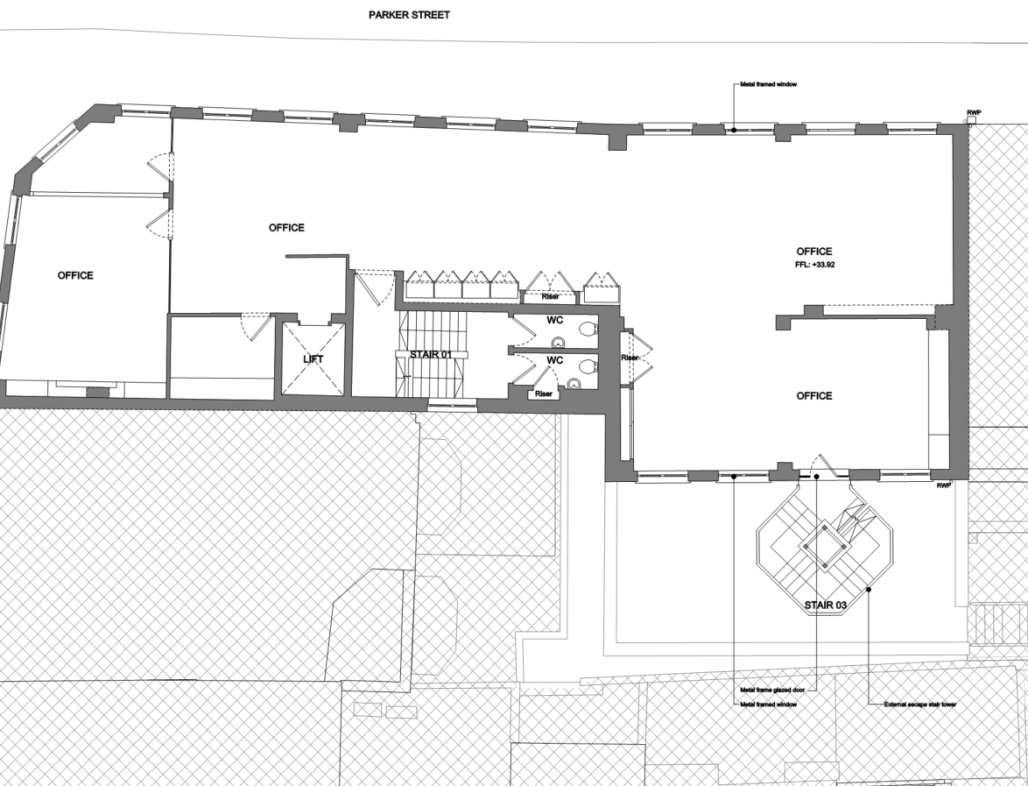
First Floor Plan – existing and proposed



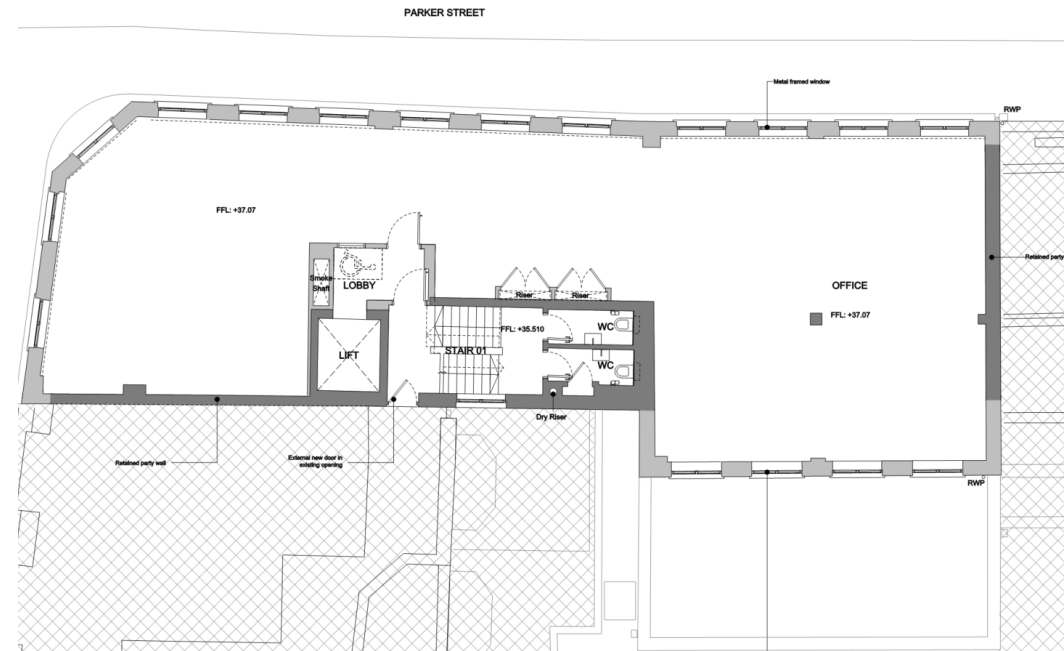
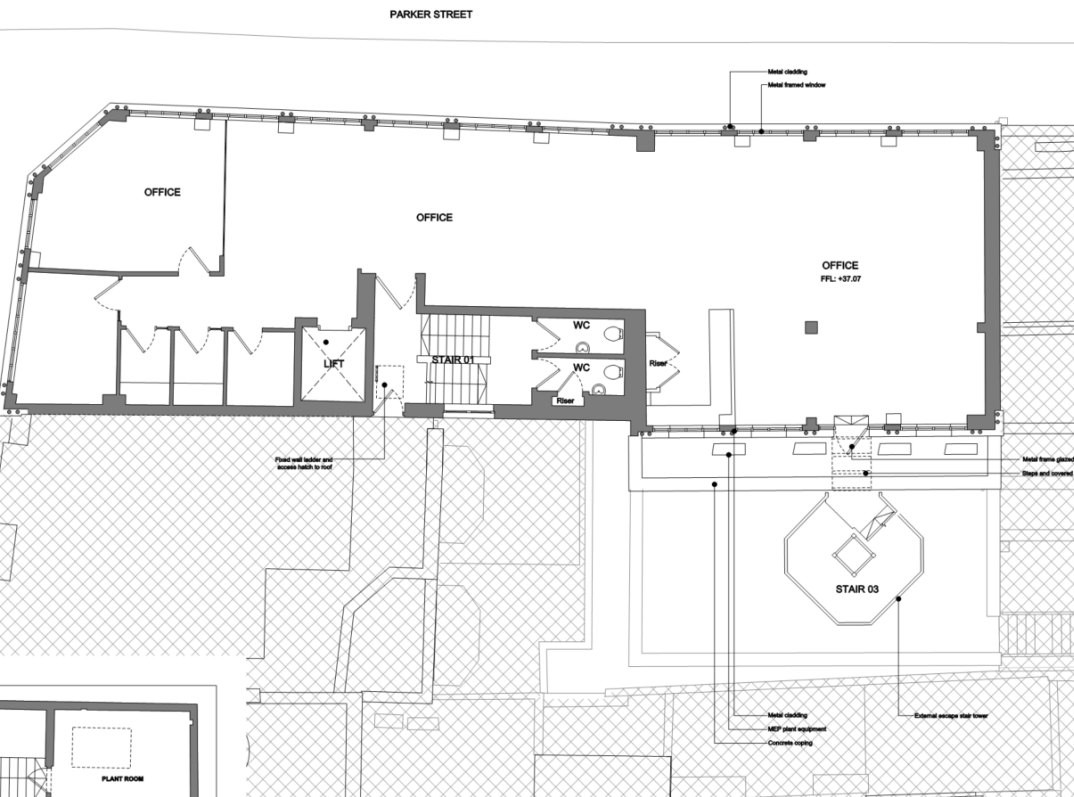
Second floor plan -existing and proposed



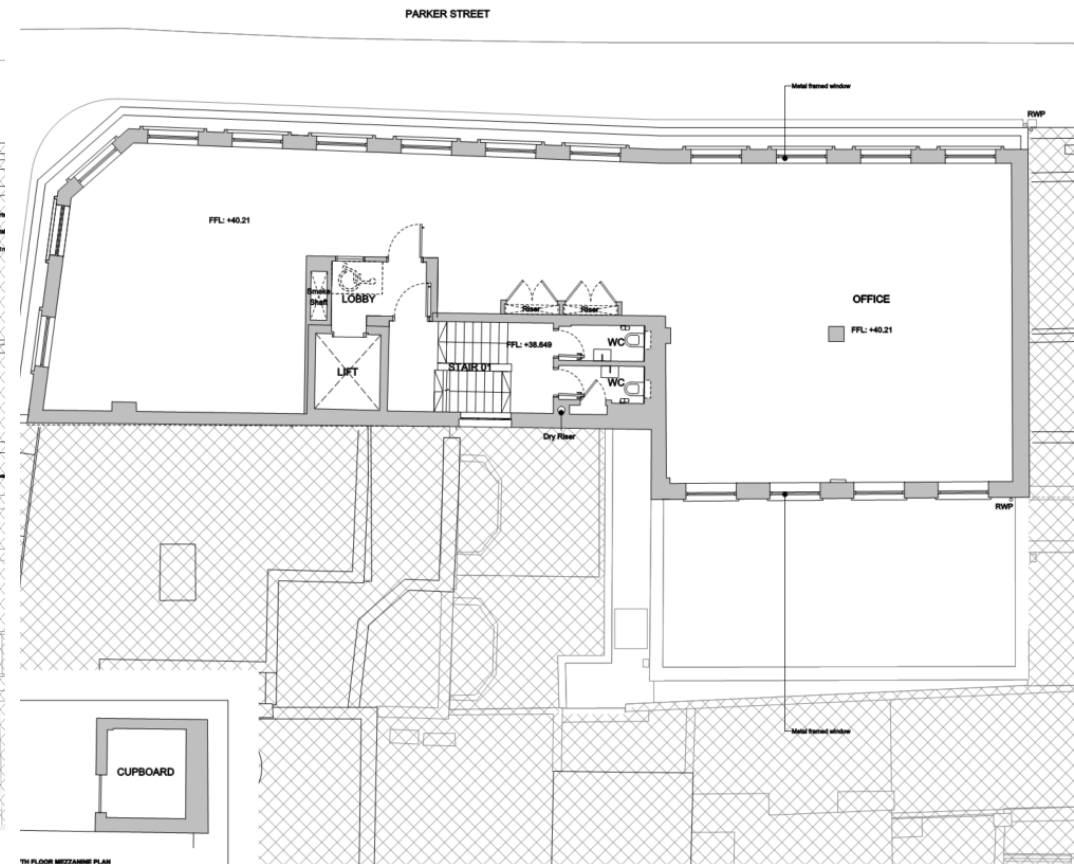
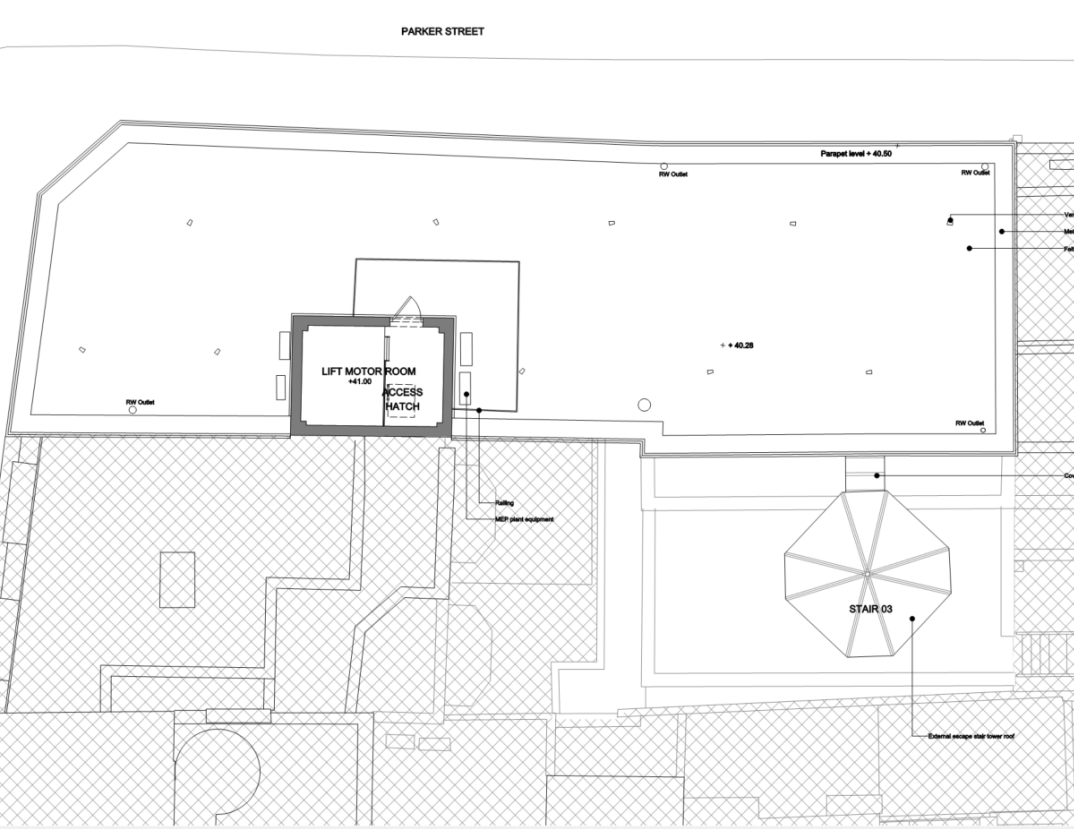
Third floor plan – existing and proposed



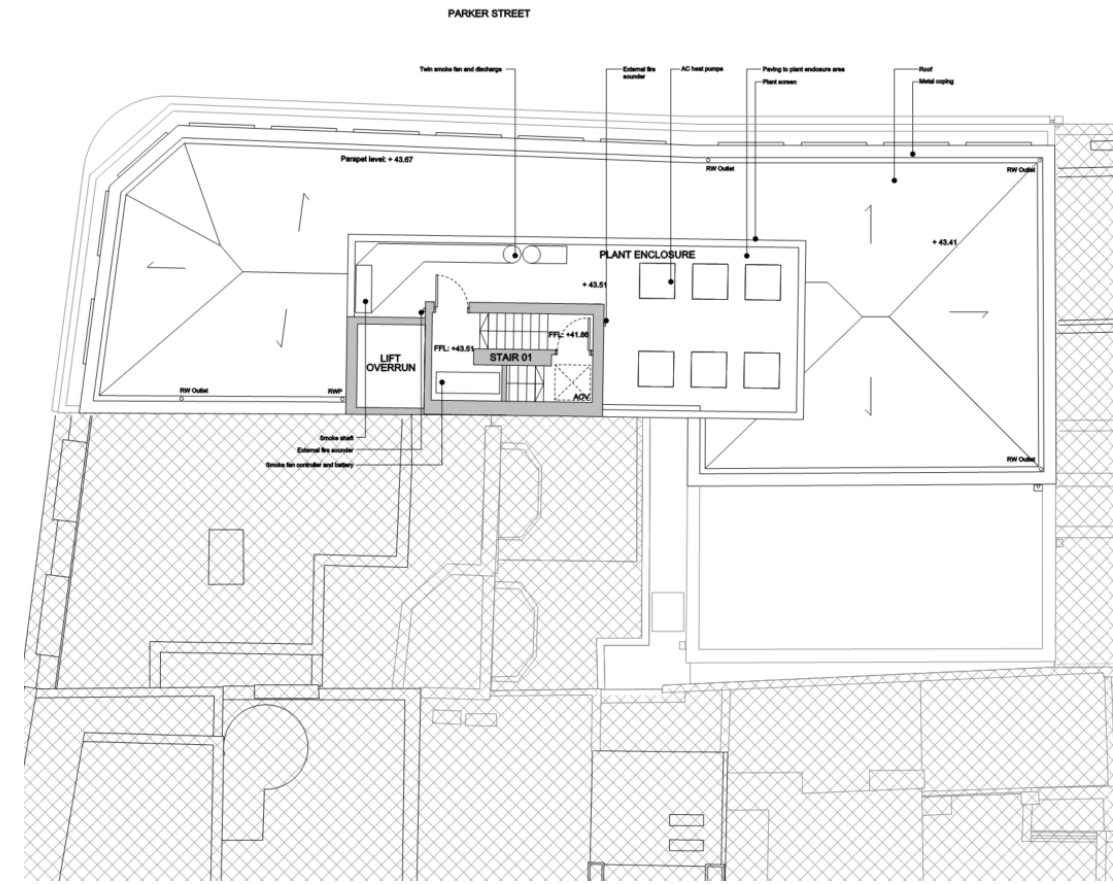
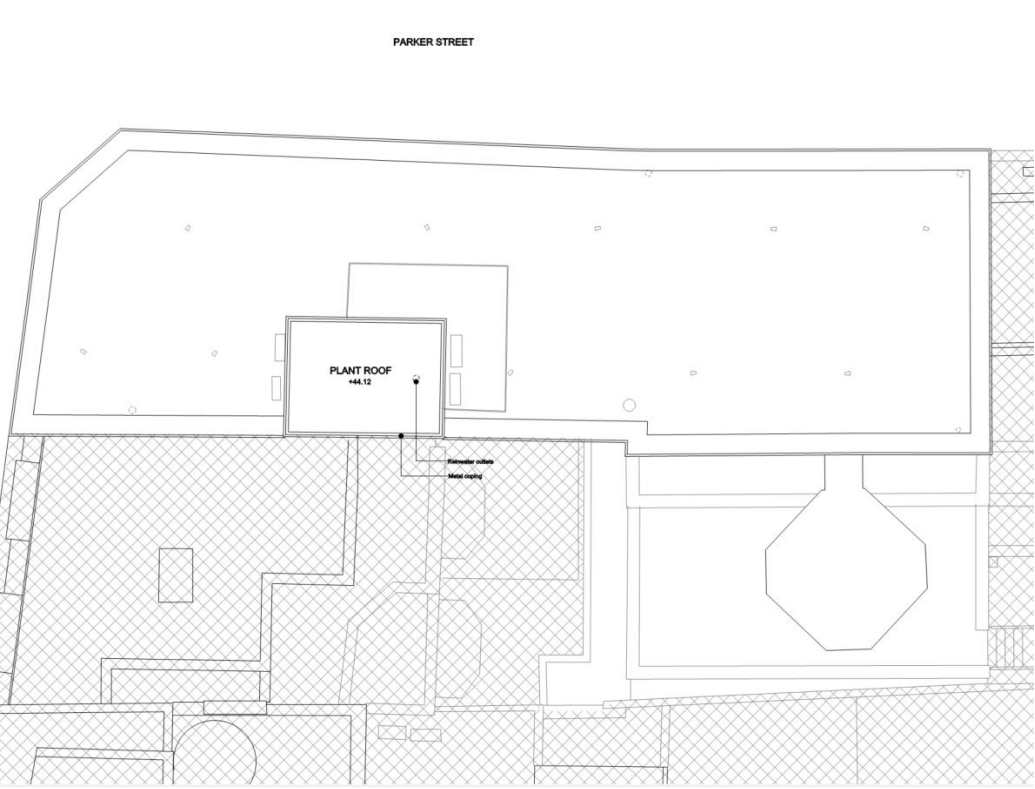
Fourth floor – existing and proposed



Fifth floor plan – existing and proposed



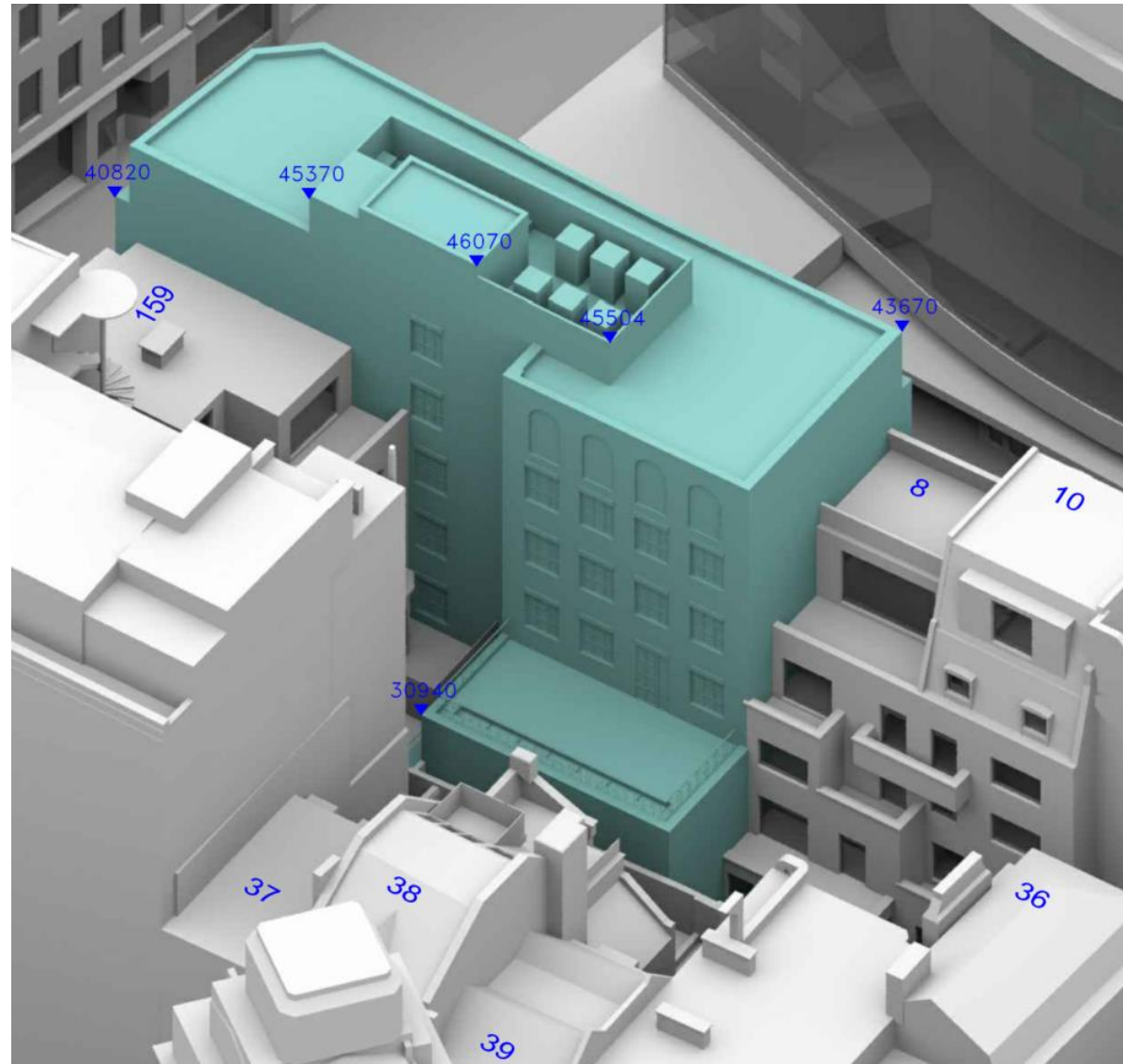
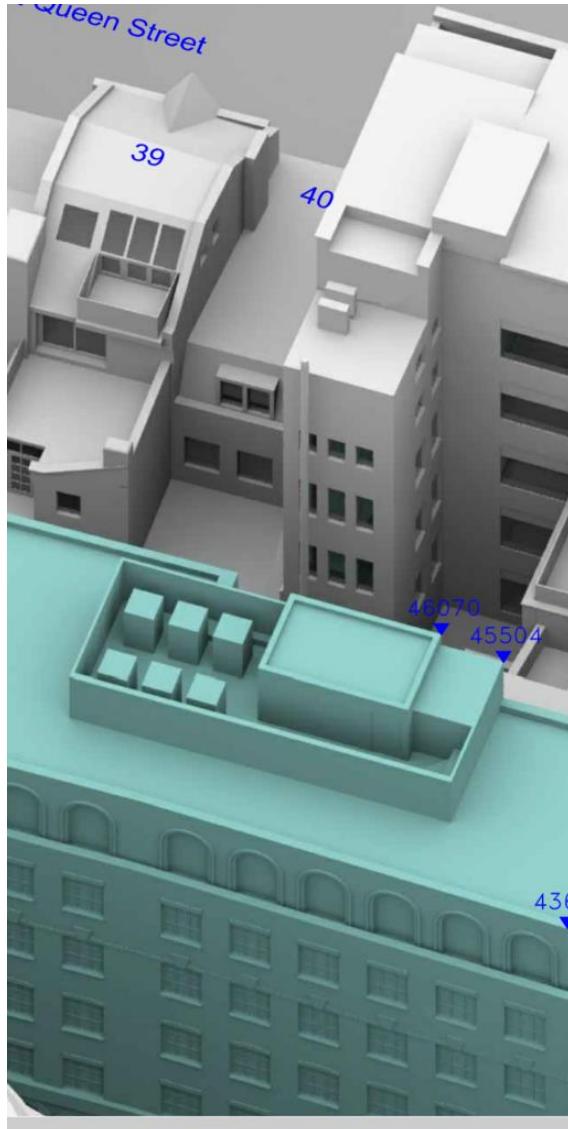
Roof/sixth floor plant room – existing and proposed



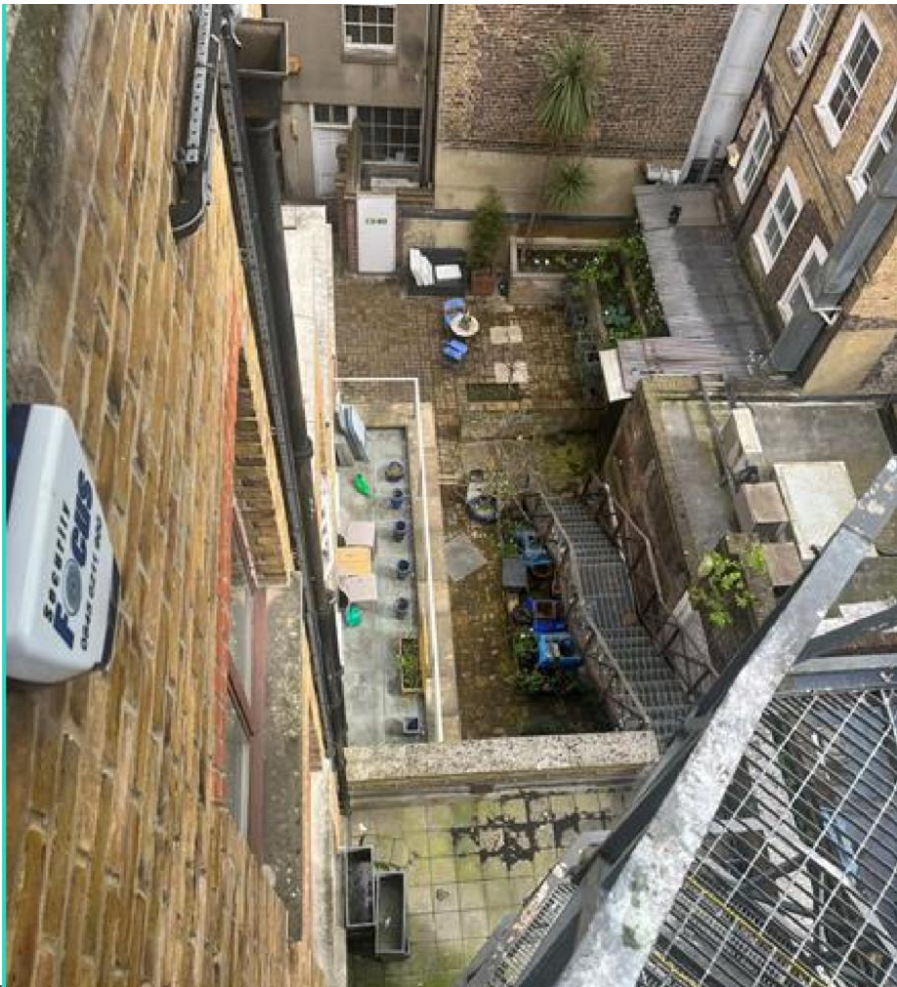
Existing and Proposed elevation



BRE Daylight test – most affected buildings No. 40 Great Queen Street, 159 Drury Lane and 8-18 Parker Street (application site as proposed to be extended is shown in aqua).



Relationship between existing site (red) and 8-18 Parker Street (yellow);
Right hand photo shows the lower level amenity spaces adjacent the proposal site
with the site in the immediate foreground of the image.



21st March Sun on ground indicator, existing (left) and proposed (right)



8-18 Parker Street Fifth and fourth floor residential terraces and impacted windows

