

# Selkirk House

Local Planning Authority: Camden

Local Planning Authority reference: 2023/2510/P

## Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

## The proposal

Redevelopment to provide a mixed-use scheme with buildings ranging in height to 19 storeys. The scheme would provide 22,650 sq.m. (GIA) of office floorspace (Class E(g)(i)), 1,667 sq.m. (GIA) of flexible town centre floorspace (Class E), 44 residential units totalling 3,992 sqm (GIA) of residential floorspace, along with provision of new public and other associated works.

## The applicant

The applicant is **Lab Selkirk House Ltd** and the architect is **DSDHA**.

## Strategic issues summary

**Land use principles:** The loss of visitor accommodation and the principle of a commercial-led, mixed-use development does not raise any issue in response to strategic policy considerations. Further information should be provided from the applicant in relation to the affordable workspace offer.

**Urban design and heritage:** The development must demonstrate acceptable impacts as required by Policy D9(C) in relation to the tall building proposed. The development would result in less than substantial harm to heritage assets and a total loss of significance from the demolition of non-designated heritage assets. A further reduction to the height and massing of 1 Museum Street could reduce heritage harm. Comments in relation to site optimisation, residential quality, inclusive design, children's playspace should also be addressed.

**Transition to a zero-carbon economy and sustainable infrastructure:** The applicant should provide further response for GLA officers to reach conclusion on whether an appropriately thorough exploration of alternatives to demolition has been carried out. Unresolved comments on the energy strategy, circular economy, whole life-cycle carbon, sustainable drainage / flood risk and digital infrastructure should be addressed.

Other issues on **transport, affordable housing and environmental issues** also require resolution prior to the Mayor's decision making stage.

## Recommendation

That Camden Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 125. Possible remedies set out in this report could address these deficiencies.

## Context

1. On 7 July 2023, the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following categories of the Schedule to the Order 2008:
  - Category 1B: Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings— in Central London and with a total floorspace of more than 20,000 square metres; and
  - Category 1C: "Development which comprises or includes the erection of a building of...more than 30 metres high and is outside the City of London."
3. Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

## Site description

5. The approximately 0.53-hectare site is bounded by High Holborn to the south, Museum Street to the east, New Oxford Street to the north and Grape Street to the west. West Central Street dissects the site (Figure 1). The site comprises several individual different buildings within the red line area, which includes Selkirk House (166 High Holborn and 1 Museum Street), 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street.
6. Selkirk House comprises a 17-storey building, which includes two basement levels, and a further partial basement level and is occupied by the former Travelodge hotel building which ceased operation in 2020 and a multi-storey car park (which the applicant sets out was brought back into use in 2023).
7. The West Central Street buildings were previously in retail use at ground floor level fronting New Oxford Street. The basement, first and second floors of No. 39 – 41 were in office use with the upper floors of 35 – 37 in residential use. No's 16a, 16b and 18 West Central Street were previously in use as a nightclub at basement level with offices above. It is understood that the nightclub has not been in use since its licence was revoked in September 2011 and this loss has been previously been accepted by the Council.



**Figure 1. Location plan of the development site**

8. The northern component of the site falls within the Bloomsbury Conservation Area. 10-12 Museum Street and 35-37 New Oxford Street are Grade II Listed. Numerous other heritage assets are located within the immediate vicinity of the site, including the adjoining Grade II listed 43-45 New Oxford Street and 16 West Central Street. Other surrounding assets are further identified within the heritage section of this report.
9. In terms of other relevant strategic land use designations, the site is located within the Central Activities Zone and Tottenham Court Road Opportunity Area. The site falls within an Air Quality Focus Area (Oxford Street from Marble Arch to Bloomsbury), Flood Zone 1 and is within a Critical Drainage Area (CDA).
10. The site is allocated within Camden's draft Site Allocations Local Plan document as Policy HCG3 - 1 Museum Street for mixed-use development including hotel, self-contained homes, offices and retail uses. Buildings within the northern component of the site are also allocated within the adopted Site Allocations Plan 2013 (Site 18) for mixed use development provided by conversion, extension or partial redevelopment.
11. The site has a PTAL of 6b on a scale of 0 to 6b.

## **Details of this proposal**

12. The proposal is for the mixed-use redevelopment of the site including the substantial demolition of an existing car park and former hotel at Selkirk House, along with further part-demolition and refurbishment to 10-12 Museum Street, 35-41 New Oxford Street, and 16A-18 West Central Street.

13. The scheme comprises the following components:
  - Museum Street - single new building rising to 19 storeys, providing office (Class E(g)(i)) accommodation on upper levels and a range of flexible town centre uses (Class E) at ground level;
  - High Holborn - single new building rising to 6 storeys, providing residential (Class C3) accommodation on upper levels and a flexible town centre use (Class E) at ground level;
  - Vine Lane - single new building rising to 5 storeys, providing residential units with a flexible town centre use (Class E) at ground level; and
  - West Central Street - a series of new and refurbished buildings rising to 6 storeys, providing residential accommodation on upper levels (Class C3) and flexible town centre uses (Class E) at ground level.
14. Overall, the scheme would provide 22,650 sq.m. (GIA) of office floorspace (Class E(g)(i)), 1,667 sq.m. (GIA) of flexible commercial floorspace at ground floor level (Class E – specifically comprising 186 sq.m. of open class E floorspace and 1481 sq.m. of restricted Class E floorspace preventing office and research and development uses), 44 residential units totalling 3,992 sq.m. (GIA) of residential floorspace, including 19 affordable units (47.8% affordable housing by habitable room), and the provision of new public realm, including a new pedestrian route through the site known as 'Vine Lane' to link West Central Street with High Holborn, along with other associated works and ancillary uses.
15. The application is submitted alongside a Listed Building Consent application to be reviewed by the Council for works to 10-12 Museum Street and 35 and 37 New Oxford Street, both of which are Grade II Listed.

## **Case history**

16. Application ref. 2021/2954/P (GLA Stage 1 reference: 2021/0851/S1) was submitted in June 2021 for the mixed-use redevelopment of the site to provide a mixed-use scheme, providing office, residential, and town centre uses. The application was withdrawn in 2023, following the Grade II Listing of 10-12 Museum Street and 35-37 New Oxford Street.
17. The change of use of Selkirk House from offices (Class B1) to a 184-bed hotel (Class C1) and to a ground floor restaurant (Class A3) and associated elevational alterations was granted in 2005 (LPA ref: PSX0204780). The development included the retention of residential units in the form of 11 duplex units which was provided on the 14<sup>th</sup> and 15<sup>th</sup> floors of Selkirk House, totalling approximately 1,392 sq.m. (GIA) in the proposed development. The applicant sets out that following implementation of the consent, the units have been in use as serviced apartments and that the lawful use is Class C1 (to be confirmed by the Council).
18. Planning permission for the refurbishment and extension of 35-41 New Oxford Street, 10-12 Museum Street, 16A – 18 West Central Street to provide a mixed-

use scheme including 19 self-contained residential units, flexible A1/A2/A3 uses and B1 and/or D1 at basement and ground floor levels, granted in May 2017 (LPA ref: 2016/0477P). It is understood that this consent was not implemented and has since expired.

19. Listed Building Consent application 2023/2653/L is currently under consideration by the Council.
20. The site has been subject to several other planning applications in the past which are not considered to be of relevance to this strategic review. It is noted that there have been various applications for planning permission refused by the Council (LPA refs. 2013/4378/C; 2013/4275/P; 2009/5463/C; 2009/5460/P) which include proposals for demolition, redevelopment and extension of buildings within the site.

### **Strategic planning issues and relevant policies and guidance**

21. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Camden Local Plan and Policies Map (2017), Camden Site Allocations Plan (2013), North London Waste Plan (2022) and the London Plan (2021).
22. The following are also relevant material considerations:
  - The National Planning Policy Framework and National Planning Practice Guidance;
  - National Design Guide (2021);
  - Draft Site Allocations Plan (2020);
  - Draft Camden Holborn Vision and Urban Strategy (2018); and
  - Other local plan supplementary documentation (which includes relevant Camden Planning Guidance and Conservation Area Appraisals).
23. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
  - Good Growth - London Plan;
  - Economic development - London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;
  - Central Activities Zone - London Plan;
  - Opportunity Area - London Plan;

- Housing and re-provision of housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards LPG;
- Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy; Affordable Housing draft LPG; Development Viability draft LPG.
- Office / Hotel - London Plan;
- Heritage - London Plan;
- Strategic views - London Plan, London View Management Framework SPG;
- Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy LPG; Optimising Site Capacity: A Design-Led Approach LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards LPG;
- Fire Safety – London Plan; Fire Safety draft LPG;
- Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG;
- Sustainable development - London Plan; Circular Economy Statements LPG; Whole Life-Cycle Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; Mayor's Environment Strategy;
- Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air Quality Neutral LPG;
- Transport and parking - London Plan; the Mayor's Transport Strategy; Sustainable Transport, Walking and Cycling LPG;
- Green Infrastructure - London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG; All London Green Grid SPG; Urban Greening Factor LPG;
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#)<sup>1</sup>.

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<sup>1</sup> [https://www.london.gov.uk/sites/default/files/first\\_homes\\_planning\\_practice\\_note\\_.pdf](https://www.london.gov.uk/sites/default/files/first_homes_planning_practice_note_.pdf)

## Land use principles

24. London Plan Policy SD1 identifies Opportunity Areas as one of the focal points for intensification; and seeks to ensure that Opportunity Areas fully realise their growth and regeneration potential. The application site is located within the Tottenham Court Road Opportunity Area which falls within the Central London Growth Corridor. The London Plan identifies an indicative development capacity for the Opportunity Area of 300 new homes and 6,000 new jobs by 2041. The proposed uplift in employment floorspace and residential units would contribute to the housing and employment aspirations for the Opportunity Area in line with London Plan Policy SD1. The proposed residential uses are also supported by London Plan Policy H1 seeks to increase London's housing supply.
25. It is further noted that the site also sits within the Tottenham Court Road Growth Area within the Local Plan and is identified within the Council's Draft Site Allocations Plan (2020) under Policy HCG3 1 Museum Street for the mix of commercial and residential uses with an emphasis on enhancing the public realm and permeability through the site.

### Loss of hotel

26. London Plan Policies SD4 and SD5 of the London Plan seek to manage development within the CAZ. Policy SD4 promotes the strategic functions of the CAZ which includes tourism facilities. Policies SD4 and SD5 also set out the role of Development Plans in ensuring that an appropriate balance in the various CAZ strategic functions should be provided, having regard to local circumstances.
27. London Plan Policy E10 states that London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure; and that a sufficient supply and range of serviced accommodation should be maintained. Policy E10 also sets out that within the CAZ, strategically important serviced accommodation (defined as more than 20,000 sq.m. in the CAZ) should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ, and subject to the impact on office space and other strategic functions. It is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041.
28. Selkirk House was previously occupied by the former Travelodge hotel (approximately 9200 sq.m. (GIA) which was vacated in 2020. An accompanying hotel needs assessment has been provided which includes an assessment of the loss of visitor accommodation against existing and pipeline supply and demand. The assessment concludes that overall, the resultant impact on the local hotel market due to the loss of bed spaces at the site will be minimal.
29. Strategically, whilst the site is broadly considered to be an appropriate location for visitor accommodation, GLA officers do not raise any objection with the loss of visitor accommodation in terms of its impact on the supply of serviced

accommodation. However, the Council will also undertake a review of the proposal against detailed local plan requirements and objectives, including any protective policies. An update will be provided to the Mayor at Stage II.

### Commercial uses

30. London Plan Policy SD4 recognises the CAZ as an internationally and nationally significant office location. London Plan Table 6.1 indicates that the CAZ [and the Northern Isle of Dogs] are projected to accommodate more than 367,000 additional office jobs with a net increase of 3.5 million sqm (GIA) of office floorspace over the period 2016-2041.
31. Policy SD4 also states that the nationally and internationally significant office functions of the CAZ should be supported, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values. This is reinforced by London Plan Policy E1 which further supports growth of office floorspace within the CAZ. London Plan Policy SD5 states that offices and other CAZ strategic functions are to be given greater weight relative to new residential development within the CAZ (except in the specific areas and circumstances listed).
32. The scheme would provide 22,650 sq.m. (GIA) of office floorspace. The uplift in office floorspace within the CAZ is supported in line with the strategic land use policies above. 1,667 sq.m. (GIA) of flexible commercial floorspace at ground floor level is also proposed. The commercial floorspace appears to align with local policy objectives which support town centre type uses within the Tottenham Court Road Growth Area and the quantum proposed does not raise any strategic issue. The Council should ensure that the new commercial provision is secured appropriately within Use Class E.
33. The applicant sets out a commitment to delivering affordable commercial floorspace as part of the development which is supported within the context of London Plan Policy E3. Limited detail on the affordable workspace provision has been provided at this point and this should be confirmed. The affordable workspace should then be secured appropriately in the s106.

### Residential use and housing re-provision

34. London Plan Policy H1 aims to increase housing supply by setting borough targets for new housing, with boroughs encouraged to identify additional development capacity, particularly on brownfield land. The London Plan sets Camden a housing completion target of 10,380 units between 2019/20 and 2028/29. The Tottenham Court Road Opportunity Area and Camden's draft Site Allocation Document also promotes the site for a mix of uses including residential and GLA officers support the principle of residential units. It is noted, however, that design comments within this report relating to the quality of the residential accommodation must be suitably resolved.
35. London Plan Policy H8 sets out that the loss of existing housing should be replaced by new housing at existing or higher densities with at least the



equivalent level of overall floorspace. The proposed development will provide 44 residential units totalling 3,992 sqm (GIA) which results in an uplift when compared to the existing residential floorspace on site. The submission identifies this to be an uplift of 2,078 sqm (GIA), which includes all Use Class C3 floorspace on site and also accounts for former residential floorspace within Selkirk House which the applicant sets out is now lawfully Use Class C1 along with a small provision of existing HMO floorspace. The proposal would also result in an increase in habitable rooms and units. The re-provision of housing meets the objectives of Policy H8.

36. The phasing proposed includes the construction of the West Central Street, Vine Lane and High Holborn buildings within the final phase (Phase 3) of the development with the construction of the 1 Museum Street building occurring in the previous phase. The Council must ensure that the housing element of the scheme, including the delivery of affordable housing is robustly secured.

### Land use summary

37. The site is located within the CAZ and the Tottenham Court Road Opportunity Area. At the local level, the site is identified for mixed-use development in Camden's draft Site Allocation Document and falls within the Tottenham Court Road Growth Area. The loss of visitor accommodation and the principle of the commercial-led, mixed-use development does not raise any issue in response to strategic policy considerations. Further information should be provided from the applicant in relation to the affordable workspace offer.

### **Affordable housing**

38. London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 sets out the threshold level of affordable housing, which in this case is a minimum of 35% (by habitable room).
39. Policy H6 of the London Plan sets out a preferred tenure split of at least 30% low-cost rent (London Affordable Rent or social rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the local planning authority in line with relevant Local Plan policy. It is the expectation, however, that the remaining 40% is weighted towards affordable rented products. LB Camden's Local Plan sets out affordable housing tenure split 60-40 in favour of social/affordable rent.
40. The applicant is proposing a 47.8% affordable housing offer by habitable room (43.2% by unit), comprised of low-cost rent (understood to be London Affordable Rent) and intermediate rent units. The overall affordable housing offer would meet the 35% threshold set out within Policy H5. The habitable room summary is provided within Table 1 below:

**Table 1. Proposed habitable room summary**

Address	Tenure	Habitable Rooms
West Central	LCR	35
	Intermediate	17
	Market	9
Vine Lane	Market	41
High Holborn	Market	11
Total	-	113

41. The affordable residential accommodation will be located in the West Central Street Building, totalling 19 units on site, which would comprise 11 low-cost rent and 8 intermediate units with a split of 58/42 in favour of low-cost rent. As affordable homes are provided above the 35% threshold level, the tenure mix meets the requirements of London Plan Policy H6.
42. The scheme meets the threshold level of affordable housing (without public subsidy) and is expected to follow the Fast Track Route. The affordability of the proposed products must also comply with the qualifying requirements of Policy H6 of the London Plan, the Mayor’s Affordable Housing and Viability SPG, draft Affordable Housing LPG, and the London Plan Annual Monitoring Report and should be secured in the S106 agreement. An early-stage review would then be required in accordance with Policy H5 of the London Plan.
43. The phasing proposed includes the construction of the West Central Street, Vine Lane and High Holborn buildings within the final phase (Phase 3) of the development with the construction of the 1 Museum Street building occurring in the previous phase. The Council must ensure that the housing element of the scheme, including the delivery of affordable housing is robustly secured.
44. GLA officers request early engagement into the wording of the draft S106 agreement to ensure appropriate wording for the review mechanism, as well as obligations in relation to the delivery of affordable housing.

## Urban design

45. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

### Optimising development capacity

46. London Plan Policy D3 requires the optimisation of sites by following a design-led approach. The proposed uplift in commercial and residential floorspace does not raise any concern in terms of supporting infrastructure capacity, given the site's highly accessible location within the Opportunity Area. As set out within the transport section of this report, GLA officers are satisfied that the proposal would not result in significant impact to local public transport infrastructure and services. The scheme appropriately responds to Policy D3(B).
47. Along with the site's capacity for growth, Policy D3 also identifies various elements relating to the form and layout, experience, quality and character that development proposals should achieve. Regarding the form of development and response to the surrounding context, the design concept has generally progressed through a design-led process. GLA officers remain of the view that the form of the 1 Museum Street building could benefit from further consideration, given the impact of the proposal on heritage assets. This is reflected within the heritage section of this report below. The Council should ensure that the form of the development demonstrates compliance against the criteria set out in Policy D3(D). Design, transport and sustainability comments set out within the report below must also be addressed.

### Design scrutiny

48. London Plan Policy D4 requires that the proposal must undergo at least one design review before a planning application is made, or demonstrate that it has undergone a local borough process of design scrutiny, based on the principles set out in Policy D4(E). The applicant has set out that the previous application (LPA ref: 2021/2954/P) was subject to an extensive pre-application process including review by the Council's Design Review Panel. The proposal currently under consideration remains largely consistent with the design of the previous scheme although it is noted that there has been a change in context with the recent Grade II Listing of 10-12 Museum Street and 35-37 New Oxford Street. However, it is considered that the scheme has been subject to acceptable design scrutiny in this instance and GLA officers do not raise any strategic concern with the application's response to Policy D4.

### Tall building, scale and massing

49. The proposed building at 1 Museum Street meets the Local Plan definition of a tall building and therefore is subject to assessment against London Plan Policy D9. Policy D9 seeks to manage the development and design of tall buildings within London. Policy D9 (Part B3) states that tall buildings should only be developed in locations that are identified as suitable in development plans. Part C of Policy D9 also sets out requirements for assessing tall buildings, including addressing their visual, functional, environmental, and cumulative impacts.

### *Appropriateness of site for tall buildings*

50. In this case LB Camden has not identified locations where tall buildings (with appropriate building heights) may be appropriate in its adopted Development Plan. Accordingly, the development does not meet the locational requirements set out in Policy D9(B). It is noted that Camden's draft Site Allocations Plan (2020) policy for the site acknowledges that there is an existing building on site of 17 storeys and states that any replacement building should be of a height and massing that can successfully integrate with the surrounding townscape. Supporting text suggests that this could be in the form of a more elegant and refined tower. The draft site allocation policy does not set out specific heights within the document. The existing building and draft policy are material considerations.
51. Overall, the non-compliance with Policy D9 part B has to be balanced against the scheme as a whole and the impacts of the tall building require assessment under Policy D9(C). These considerations are set out below.

### *Visual impacts*

52. The proposal would be visible in long-range views, including from the River Thames, however it is not considered that the scheme would result in unacceptable impacts to the Mayor's Strategic Viewing Corridors as set out in the London View Management Framework (LVMF). The Council should review any impacts of the proposed development on any protected local views.
53. The proposal has also been assessed in terms of its impact on immediate views and mid-range views from the surrounding neighbourhood. Whilst it is recognised that the proposals will replace a poor-quality building, it is important that what is replaced is able to successfully integrate into the surrounding townscape. It is noted that revisions were incorporated to the 1 Museum Street building under the previous withdrawn application 2021/2954/P which included a reduction in height by two storeys and an increase in width of the building. The proposal would result in various degrees of harm to the setting and significance of heritage assets, GLA officers consider that a more slender design for the tower and a further reduction in height could reduce the potential harm to heritage assets, and that the massing of this element would therefore benefit from further refinement.

### *Functional impacts*

54. The development is within a highly accessible location within the Opportunity Area and does not raise any strategic transport issues with the capacity of public services and the quantum of development proposed. Comments in relation to healthy streets and deliveries and servicing must be addressed. The entrance lobby and ground floor layout is otherwise broadly supported. The Fire Statement included with the application sets out the key fire safety features in line with Policy D12 of the London Plan. It is considered that the development seeks to maximise the economic activity and regeneration potential that will be provided by the development within the Opportunity Area. Any potential impacts on telecommunication should be suitably addressed and other functional

considerations, for instance building management arrangements, should be reviewed by the Council.

#### *Environmental impacts*

55. In terms of environmental impacts, the applicant's technical information will be assessed in detail by the Council, including whether mitigation measures and conditions are necessary to make the application acceptable. The GLA will consider the Council's review and an update will be provided to the Mayor on these matters at his decision-making stage.

#### *Cumulative impacts*

56. When considering the cumulative visual impacts with any other proposed, consented and planned tall buildings, GLA officers do not raise any strategic issues in terms of cumulative visual or functional impacts with other tall buildings. The Council should review if there are any cumulative environmental impacts of concern.

#### *Tall building summary*

57. The proposed tall building would not meet the locational requirements as set out within Policy D9(B). GLA officers note that the existing building and emerging site allocations policy are also material considerations. However, the impacts of the tall building also require an assessment. The scheme would deliver beneficial economic and regenerative impacts within the Opportunity Area and Tottenham Court Road Growth Area. Harm to the surrounding historic environment also remains of concern and GLA officers will make a final determination on the proposed tall building at Stage II, having also reviewed the Council's detailed assessment.

#### *Other scale, massing and appearance*

58. GLA officers do not raise any strategic issue overall with the scale and massing of the High Holborn, Vine Street or West Central Street buildings proposed in terms of their visual impact or impact on the townscape.

#### Site layout and public realm

59. Policies D1-D3 and D8 of the London Plan apply to the design and layout of development and the public realm. The proposed layout of the site, with new and improved connections and public realm, is supported and is a benefit of the scheme. This aligns with urban design principles adopted at other nearby sites. Cumulatively the development of these sites will help a rebalancing towards pedestrians in this busy area of central London.
60. The scheme would deliver active frontages and meaningful public realm improvements. The creation of new public pedestrian route through linking High Holborn with West Central Street is supported and will result in a considerable improvement to the overall permeability of the site and wider connectivity within the area. In line with London Plan Policy D8, the management and

maintenance of the public realm in accordance with the Public London Charter LPG should be appropriately secured.

### Residential quality

61. Residential accommodation must be of a high-quality design in line with the objectives of London Plan Policy D6. There shouldn't be any differentiation in the quality of design between tenures. Policy D6 also sets out quantitative standards for residential accommodation.
62. It is welcomed that the applicant has maximised the inclusion of dual aspect units. The constrained layout of the development does, however, result in low daylight compliance and narrow separation distances. The proposal includes one private tenure unit within 35 New Oxford Street which does not meet minimum space standards, with a shortfall of 2 sq.m. identified by the applicant as resulting from the existing building structures and heritage constraints. There are also nine affordable and private units within the West Central Street buildings and three private units within the High Holborn building which do not benefit from private amenity space. As identified in the following sections of this report, there are outstanding air quality issues to be resolved and comments in relation to the London Plan cooling hierarchy should be addressed prior to Stage II. The Council will undertake a detailed review of potential acoustic issues and any mitigation necessary.
63. The Council should consider if further mitigations or revision is necessary to ensure that acceptable quality of accommodation is achieved. GLA officers will provide an update to the Mayor on this matter at Stage II.

### Fire safety

64. In accordance with London Plan Policy D12 on fire safety, the applicant has submitted a fire statement which has been approved by a suitably qualified consultant and appears to address the requirements of Policy D12(B). Evacuation lifts have been incorporated into the cores where lifts are installed in response to London Plan Policy D5(B5). The fire consultant identifies that the design is suitable in response to the relevant fire safety policies in the London Plan. It is noted that the Fire Statement confirms that all residential buildings are less than 18 metres in height. The Council should secure compliance with the fire statement by condition and is encouraged to refer to the example conditions listed in the draft Fire Safety LPG. The evacuation lifts should also be secured.

### Inclusive design

65. London Plan Policy D5 seeks to ensure that new development achieves the highest standards of accessible and inclusive design. In addition, London Plan Policy D7 sets out requirements for wheelchair user and accessible and adaptable dwellings. It is proposed that 11% of the units (five units) will be wheelchair accessible (M4(3)) in line with Policy D7 and are distributed across the market and affordable elements of the scheme. However, the High Holborn

block and units within the West Central Buildings will not be provided with a lift due to site and building constraints. Supporting text paragraph 3.7.6 sets out limited exemptions to the provision of Category M4(2) accessible and adaptable dwellings, where the provision of a lift to dwelling entrances may not be achievable. The applicant has set out how, where possible, properties will be designed internally to Category M4(2) specifications, or would satisfy the mandatory building regulations requirements of M4(1) 'visitable dwellings'. GLA officers have reviewed the specific set of site constraints applicable and accept the approach taken by the applicant in this instance. The Council should secure the M4(3), M4(2) and M4(1) requirements. The Council will also undertake a detailed review of inclusive design measures proposed.

### Children's playspace

66. London Plan Policy S4 seeks to ensure that development proposals include suitable provision for play and recreation and sets out that off-site provision secured by an appropriate financial contribution may be acceptable where it can be demonstrated that it addresses the needs of existing residents. Based on the GLA benchmark of 10 sq.m. per child, the required playspace provision equates to 159 sq.m. with 66 sq.m required for the 0-4 age group.
67. The Design and Access Statement sets out that proposed play space for ages 0-12 will be provided within the courtyard of the West Central Street buildings and roof level of the Vine Street building with over 12 play space provided within surrounding public realm and off site. There are discrepancies between the figures within the submission and therefore further clarification and verification of the play provision is required. The Council should confirm that the approach to address the playspace shortfall off site is satisfactory having regard to local policy. The on-site play provision, design details of equipment and any financial contribution should be secured.

### **Heritage**

68. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. The NPPF states that in weighing applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.
69. London Plan Policy HC2 World Heritage Sites requires that development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the

authenticity and integrity of their attributes. Other relevant heritage policy considerations are also identified within London Plan Policies SD4, D3 and D9.

### Assessment of impacts

#### *Direct impacts and benefits*

70. 10, 11 and 12 Museum Street and 35 and 37 New Oxford Street are listed at Grade II and are identified as positive contributors to the Bloomsbury Conservation Area. The buildings are proposed to be converted into townhouses and flats above the ground floor. Overall, the works to 10 to 12 Museum Street and 35 and 37 New Oxford Street are considered to cause a low extent of less than substantial harm to the significance of the listed buildings. Public benefits, including heritage benefits, flow from the restoration of these neglected buildings and their conversion to a residential use. Details will need to be managed through appropriate conditions and benefits secured through appropriate Section 106 Agreement terms. There are heritage benefits but they are relatively small and may be achievable in the context of a more modest overall scheme.
71. 16a, 16b and 18 West Central Street are identified as positive contributors to the Bloomsbury Conservation Area and as Non-Designated Heritage Assets. The buildings hold a Certificate of Immunity from Listing from February 2023. These buildings are proposed to be demolished and replaced with the West Central Street building and since these buildings are positive contributors, and would be replaced by a 5-6 storey building which does not adhere to the hierarchies of space within the conservation area (where grander and taller buildings on New Oxford Street are backed by humbler and lower buildings), this causes harm to the significance of the Bloomsbury Conservation Area. The harm to the conservation area by the demolition and the increased height of the replacement building is considered to be less than substantial at the middle extent of the range. In terms of the Non-Designated Heritage Assets, there is a total loss of significance.

#### *Indirect impacts*

72. The proposal would replace an existing unattractive and poor quality 17 storey building with a new tall building, which, at 19 storeys and with a broader footprint, is significantly taller and bulkier than the existing building. The impacts of the existing building are therefore exacerbated. The proposal also includes new six storey buildings at Vine Lane and High Holborn which are taller than the local context.
73. GLA officers consider that the following levels of harm are caused to heritage assets, through harm to the contribution made by setting to significance, by the proposed development (in all cases the assessment is based on the cumulative scenario):
74. The scale used is very low, low, low to middle, middle, middle to high, high and very high.



<b>Heritage asset</b>	<b>Category of harm</b>	<b>Extent of harm</b>	<b>TVIA View reference</b>
The Old Crown, 33 New Oxford Street and 10, 11 and 12 Museum Street and 35-37 New Oxford Street, listed Grade II	Less than substantial	Middle	View 6A, 6B, 10
The Bloomsbury Public House, listed Grade II	Less than substantial	Low to middle	View 5, 6A, 6B, 10
43 and 45 New Oxford Street including 16 West Central Street, listed Grade II	Less than substantial	Low to middle	View 6A, 6B, 10
James Smith and Sons (umbrella shop), Hazelwood House, 53 New Oxford Street, listed Grade II*	Less than substantial	Middle	View 7, I
Westminster WHS and the Palace of Westminster, listed Grade I	No harm	No harm	View 21, 21.1, 22
Somerset House, listed Grade I	Less than substantial	Very low	View 20
Queen Alexandra Mansions, King Edward Mansions and Sovereign House, listed Grade II	Less than substantial	Low to middle	View 8, L
Shaftesbury Theatre, High Holborn/Shaftesbury Avenue, listed Grade II	Less than substantial	Middle	View 8, 12, L
The British Museum, Great Russell Street and associated assets, listed Grade I (associated elements Grade II* and II)	Less than substantial	Low to middle	View 1, B
Church of St George and attached railings, gates and lamps, listed Grade I	Less than substantial	Very low	View 9, D, J
Centre Point, Numbers 5-24 St Giles High Street, Numbers 101-103 New Oxford Street and Charing Cross Road, listed Grade II	No harm	No harm	View 9, 13
Bedford Square Gardens, Registered Park and Garden, Grade II* and associated listed buildings around the square and in Bloomsbury Street, Grades I and II	Less than substantial	Low to middle	View 13, 14, C

Bloomsbury Square Gardens, Registered Park and Garden, Grade II and associated listed buildings around the square, Grades II* and II	Less than substantial	Low	View 15, A
Lincoln's Inn Fields, Registered Park and Garden, Grade II and associated listed buildings including Sir John Soanes' House, Grade I	Less than substantial	Very low	View M
Bloomsbury Conservation Area	Less than substantial	Middle	View 1, 2, 3, 4, 5, 6A, 6B, 7, 8, 9, 10, 13, 14, 15, 16, A, B, C, D, H, I, J, L, M, N
Kingsway Conservation Area	Less than substantial	Very low	View 17, K
Seven Dials Conservation Area	Less than substantial	Low	View 11, 12, 18, E1, E2, F, G, L, O

75. GLA officers have identified particular concerns with the impact on the heritage assets below:

- Setting of the British Museum - although the level of harm caused is considered to be at the low to middle extent of the less than substantial harm category, it should be noted that this harm has greater weight, given the Grade I listing and internationally iconic nature of the building and its key role in the Bloomsbury Conservation Area.
- Bloomsbury Conservation Area - while assessed to cause harm at the middle extent of the less than substantial category, the impacts of the proposals on this conservation area are widespread, as illustrated in the numerous TVIA views. The view of Historic England that Bloomsbury is "one of the most important conservation areas in London" is noted, and harm should therefore be viewed as significant.
- Setting of Bedford Square Gardens, Registered Park and Garden, Grade II\* (and the associated Grade I listed buildings around the square and in Bloomsbury Street) - while this is assessed to cause harm at the low to middle extent of the less than substantial category, these squares and their associated assets are key elements of significance within the Bloomsbury Conservation Area and contain assets which are themselves highly graded and therefore greater weight should be given to this harm.
- Setting of the James Smith and Sons (umbrella shop), Hazelwood House, 53 New Oxford Street - the setting of this Grade II\* building is not currently impacted by the existing building: the harm is new and is considered to be at the middle extent of the less than substantial

category, having greater weight because of the higher grading of the asset.

- Setting of The Old Crown, 33 New Oxford Street and Numbers 10, 11 and 12 Museum Street and Numbers 35 and 37 New Oxford Street, listed Grade II - although the existing building forms a backdrop to these buildings to a degree, the impact of the proposed development is greater in relation to these modestly scaled neo-classical buildings, given the proximity and height of the proposed development, leading to an assessment of harm at the middle extent of the less than substantial category.
- Setting of the Shaftesbury Theatre, High Holborn/Shaftesbury Avenue, listed Grade II and Queen Alexandra Mansions, King Edward Mansions and Sovereign House, listed Grade II - although the existing building backdrops these buildings to a degree, the impact of the proposed development is greater in relation to the richly ornamented and carefully designed silhouettes of these listed buildings, leading to an assessment of harm at the middle extent of the less than substantial category.
- Setting of the listed buildings nearest the proposed development, including The Bloomsbury Tavern and 43 and 45 New Oxford Street including 16 West Central Street, all listed Grade II - the proposed development appears out of scale in the views presented, cumulatively causing a low to middle extent of less than substantial harm.

### Conservation conclusions

76. In accordance with paragraph 202 of the NPPF, where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. In carrying out this planning balancing exercise, in accordance with the statutory requirements, great weight and importance should be attached to harm to designated assets.
77. As set out above, GLA officers consider that the proposal would result varying degrees of less than substantial harm to the significance of the heritage assets within the surrounding vicinity of the subject site. It is also noted that Historic England has raised objection to the proposals, which must be considered carefully by the Council. Harm to heritage assets would be contrary to London Plan Policy HC1(C), however the NPPF heritage balance would also be triggered, and in accordance with the NPPF this harm would need to be able to be weighed against the public benefits of the proposal. London Plan Policy D9 also requires development proposals for tall buildings to take account of and avoid harm to London's heritage assets and their settings and requires clear and convincing justification for any harm, and demonstration that alternatives have been explored and that clear public benefits outweigh that harm. GLA officers retain the view that a further reduction in height and a refinement to the massing of 1 Museum Street would lessen the harm.

78. The results of the assessment by the Council's heritage officers on the proposals' impact on heritage assets, as well as Historic England, will be reported to and taken into account by the Mayor at Stage II. A heritage balance will be carried at Stage II when the final list of scheme benefits is known.

## **Strategic views**

79. London Plan Policies HC3 and HC4 identify the strategic views within London and set out the assessment framework for development that will impact upon strategic views, protected vistas and their landmark elements.
80. The application site does not fall within the assessment area of any Protected Vistas. However, the proposed development would be visible within the background area of LVMF River Prospects. Four Strategic Views have been identified and are understood to be agreed with the Council. These are 16A.1 South Bank, 18B.2 Westminster Bridge, 19A.1 Lambeth Bridge – centre of bridge, 19A.2 Lambeth Bridge – close to Lambeth Bank.
81. LVMF 16A.1 South Bank (View 20) - The LVMF guidance (View 16A.1) states that development in the background of Somerset House should not dominate the landmark; and that improvements to the setting of the landmark are encouraged through appropriate, high-quality design that respects Somerset House as the principal building in the view. The proposed development is marginally visible behind Somerset House, towards the left of the building line and whilst breaking the currently clear skyline, is not considered to detract from Somerset House as the principle building in the view and would not unduly impact the composition and character of this view.
82. View 18B.2 Westminster Bridge - the LVMF emphasises the strong sense of formality created by the civic scale of the buildings on the opposite side of the river and their relationship to it. Whilst the development is slightly taller than the adjacent buildings, it is considered that the clarity of the civic nature of the buildings on the north bank would be maintained.
83. Views 19A.1 Lambeth Bridge – centre of bridge and 19A.2 Lambeth Bridge - the LVMF states that the setting of the Palace of Westminster is largely unaffected by modern development when seen in views from Lambeth Bridge; and that the qualities of this setting must remain in order that the Outstanding Universal Value of the World Heritage Site, in townscape and visual terms, can be recognised and appreciated by the viewer. In terms of LVMF 19A.1, the proposed development is barely perceptible to the right of the far right of the Palace of Westminster in this view. The development would not erode the appreciation of the Outstanding Universal Value of the Palace of Westminster or harm the setting of the World Heritage Site. In LVMF 19A.2, the proposed development appears just above the office development above Charing Cross Station. GLA officers raise no issue with the development's impact on the composition of the view or landmarks within.

## Transport

### Transport assessment and public transport impacts

84. In line with London Plan Policy T4 (assessing and mitigating transport impacts), the applicant has undertaken a trip generation assessment to evaluate the impacts of the proposed development on the transport networks. The assessment assumes that 55% of employee travel takes place in the morning and evening peaks. The assessment concludes that the overall trip generation can be absorbed via active travel and public transport in line with policy T4 of the London Plan. Given that there are numerous public transport options available in close vicinity of the site with plenty of buses, London Underground and Elizabeth Line rail services, GLA officers are satisfied that the proposal would not result in significant impact to local public transport infrastructure and services.

### Healthy streets

85. A new north south pedestrian route (Vine Lane) will be extended from West Central Street to High Holborn. This is strongly supported given the increase in pedestrian trips and the anticipated future increase in vehicle movement on the parallel section Museum Street due to planned highway changes. The applicant should confirm that the width of the proposed route and that it will achieve pedestrian comfort levels (PCLs) of at least B+ during the peak periods in accordance London Plan policies D8 (Public realm) T2 (Healthy streets). The route should be publicly accessible at all times of day in perpetuity and secured as such. Legible London signage should also be installed in order to direct trips via this route and to avoid the junction of Museum Street and New Oxford Street which has previously had a poor collision rate.
86. The proposals are supported by an Active Travel Zone (ATZ) Assessment. The assessment considers the quality of key walking routes from the site to local transport stops and stations. In line with the Mayor's Healthy Streets agenda, improvements should be considered with Camden Council particularly on the route to the west towards Tottenham Court Road station where 11% of all future trips are expected to be via the Elizabeth line. Improvements should be secured through section 278 or 106 as appropriate.

### Deliveries and servicing

87. There is a redundant vehicle access to the former multi storey car park within the site along with an on-street loading bay on Museum Street. Future servicing access to the proposed building will be via a vehicle lift from High Holborn. To manage demand and minimise impact on High Holborn, a booking system should be implemented through the delivery and service plan. The creation of this access will also necessitate the relocation of 5 docking points further east. This is acceptable in principle and should be delivered by the applicant through the section 278 agreement with Camden Council. The constraints of the northern part of the site mean that this element would also be serviced from existing and proposed on-street bays.

88. Approximately 70 servicing trips per day are forecast which will be managed through a Delivery & Servicing Plan that promotes consolidation wherever possible and limits vehicles waiting or parking at the loading areas. This should be secured through the Section 106 agreement to support London Plan policies T2 and T7 (Deliveries, servicing, and construction) part F, which requires new development to reduce road danger from freight trips.

### Car parking

89. Whilst the replacement of the 228 multi storey parking spaces with a car free scheme is welcomed in this CAZ location, an on-site disabled parking space would usually be required. The applicant advises that the nearest on street disabled parking spaces are within 50 metres from the site; clarification is required as to the current usage and capacity of this and other nearby spaces.

### Cycle parking

90. The overall quantum of long stay cycle parking (429 spaces) would meet the minimum standards of the London Plan. The larger Sheffield stand spaces should be increased to meet the London Plan requirement of minimum 5% (21 spaces).
91. 29 short stay cycle parking spaces are proposed, which is below the London Plan minimum standards set out in policy T5 (Cycling) of 65 spaces required for this proposal. These spaces are distributed on Museum Street (14 spaces), High Holborn (14 spaces). The applicant explains that the Council would like to maintain a maximum footway width for West Central Street and therefore short cycle spaces in this location would conflict with that objective. To offset that shortfall, a contribution to Camden Council is proposed which could be used to provide spaces in the local area. Cycle usage is already high in this area, so is the demand for cycle parking, therefore the applicant should identify other on-street locations to demonstrate there is a robust plan for those additional spaces to come forward in line with Policy T5(D) of the London Plan.
92. As stated in London Plan policy T5, part B, all cycle parking should be designed and laid out in accordance with the LCDS. 5% accessible cycle spaces will be provided from the outset with scope to increase, which is acceptable. The proposed two-tier racks should have a machinal or pneumatically assisted system for accessing the upper level and the rack itself must allow for double locking. It must also be ensured that the routes from Museum Street and New Oxford Street are step free with crossovers where necessary.
93. The approval of details and provision/on-going maintenance of cycle parking should be secured by condition.

### Managing travel demand

94. A Framework Travel Plan has been submitted, which is welcomed. The full Travel Plan should be secured and monitored through the section 106 agreement. This sets ambitious targets for cycling with an increase to 17% for

office related trips and 14% for residential trips within 5 years. This will need to be matched by exemplary cycle provision within the site as noted above.

### Construction

95. A draft Construction Management Plan (CMP) has been provided alongside this application. A full Construction Logistics Plan (CLP) should be submitted in line with TfL guidance and secured by condition.
96. The applicant should ensure all construction vehicle movements are safe and support the Mayor's Vision Zero approach. All construction vehicles should meet the Direct Vision Standard and HGV safety permit for HGVs as part of the Mayor's Vision Zero plan to eliminate all deaths and serious injuries on London's transport network by 2041. The full CLP should also commit to all construction vehicles serving the site being part TfL's Freight Operator Recognition Scheme (FORS) and accredited to 'Silver level' status.

### **The UK's transition to a zero-carbon economy and sustainable infrastructure**

97. The need to reduce greenhouse gas emissions, and carbon in particular, to prevent a rapidly deepening climate catastrophe is accepted. The NPPF Paragraph 152, states that: the planning system should support the transition to a low carbon future in a changing climate, ... and help to ... encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

### Energy strategy

98. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.
99. The energy statement submitted with the application does not yet comply with London Plan Policies SI2, SI3 and SI4. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a separate technical memo. The outstanding policy requirements are detailed below:
  - Be Lean – further exploration of energy efficiency measures for the new build non-domestic element;
  - Be Clean – further confirmation that no existing or planned networks are within the surrounding area should be provided from the borough or relevant stakeholders and why individual ASHPs are proposed in the High Holborn building;

- Be Green – demonstration that renewable energy has been maximised, including further evidence as to why no PV is proposed and details of the proposed air source heat pumps;
- Energy infrastructure – the future connection to this network must be secured by condition or obligation;
- Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
- Overheating – details demonstrating the potential for further passive design measures and justifying the number of units where cooling is proposed.

100. For the domestic element, the development is estimated to achieve a 79% reduction in CO2 emissions compared to 2021 Building Regulations. For the non-domestic element, a 23% reduction is expected. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions for the non-domestic buildings.

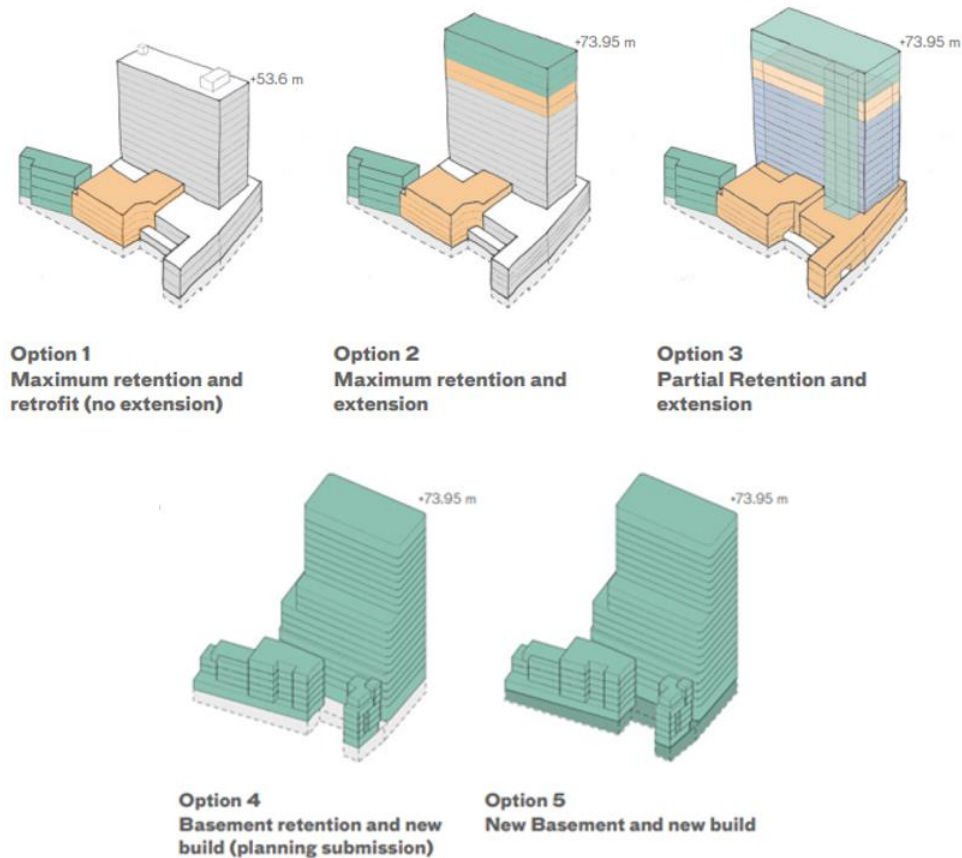
101. The development disappointingly falls short of the net zero-carbon target in Policy SI2. Once the on-site carbon savings have been maximised, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

### Circular economy

102. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG. Referable applications should promote circular economy outcomes and aim to be net zero-waste. The Circular Economy Statements LPG also includes guidance on how the design of new buildings, and prioritising the reuse and retrofit of existing structures, can promote circular economy outcomes.

103. The applicant has submitted a Circular Economy Statement along with a Retention and Redevelopment Options Review and WLC comparison document prepared specifically to analyse possible retention and redevelopment scenarios accounting for the existing building on site. As illustrated within Figure 2 below, the applicant team have presented five redevelopment options, with retention of the basement and new build (Option 4) the proposed option under consideration.





**Figure 2. Development options included within the options appraisal.**

104. The Retention Options Review sets out several issues with the existing buildings which are referenced as drivers for the redevelopment which could indicate that the building could not be sensibly adapted to accommodate a suitable quality of office space for modern occupiers. It is also acknowledged that the car park poses some substantial constraint in limiting potential for retention as part of the proposed scheme. However, GLA officers have outstanding concerns that the document exhibits limited consideration of potential solutions through the retention scheme options. The applicant should rigorously demonstrate how these constraints could not feasibly be addressed by the retention scheme options. The applicant should provide further response for GLA officers to reach conclusion on whether an appropriately thorough and rigorous exploration of alternatives to demolition has been carried out and that refurbishment or partial retention would not be deliverable or appropriate.
105. The Circular Economy Statement does not yet comply with London Plan Policy SI7. Further information is required on other key guidance requirements which include an updated Pre-Demolition Audit, bill of materials – including to address comments in relation to the material quantities reported and material intensity of the substructure and frame, along with further information and clarifications on recycling and waste reporting, operational waste and the end-of-life strategy.

106. In the event of an approval, a condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)<sup>2</sup>.

#### Whole life-cycle carbon

107. In accordance with London Plan Policy SI2, the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint. GLA officers have carried out a detailed review of the WLC assessment submitted by the applicant do not yet consider that the assessment acceptably responds to Policy SI2 and the GLA's adopted WLC guidance.

108. As set out in the circular economy section above and in line with the WLC principles set out under Table 2.1 of the guidance, further demonstration is required that options for retaining the existing buildings and structures have been fully explored before considering substantial demolition. Specifically in terms of the WLC analysis provided, further explanation is required regarding the assumptions used in the WLC models of the options appraisal.

109. In terms of the estimated WLC emissions and the key actions to reduce emissions, the development appears to meet the WLC benchmarks (except for the Vine Lane building), however these results are reliant on procurement items (high recycled contents of the steel and concrete) and these do not tend to be specified at planning stage. Without the procurement items the development exceeds the GLA WLC benchmarks. The applicant should confirm if these procurement items have been formally included and if so, what products have been specified to evaluate if the reported carbon emissions are realistic. The applicant should also confirm if any design actions have been considered such as lean design.

110. GLA officers have also raised technical comments in relation to material quantity, assumptions and end of life scenarios, along with template updates to life-cycle modules.

111. Detailed comments have been provided to the Council and applicant in a separate response memo. The applicant must address the comments provided in the excel memo provided and update the GLA WLC template.

112. The items above should be resolved prior to application determination. In the event of an approval, a condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)<sup>3</sup>.

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<sup>2</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

<sup>3</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

## Sustainable drainage and flood risk

113. A Flood Risk Assessment (FRA) has been submitted and GLA officers are satisfied that the proposed development generally complies with London Plan Policy SI 12. However, the FRA identifies that there is the potential for elevated groundwater beneath the site. In terms of the risk of flooding from groundwater, further investigation should be completed to inform the requirement of mitigation measures for the below ground elements of the proposed scheme. Groundwater monitoring should be undertaken, ideally during winter months to inform the exact mitigation measures required, which should be secured through condition.
114. The surface water drainage strategy for the proposed development generally complies with the requirements set out within London Plan Policy SI 13. The drainage strategy proposes to restrict runoff to 5l/s for each of the two proposed development sites for all events (10l/s total). The drainage strategy proposes to provide the required attenuation within a combination of blue roofs and below ground attenuation tanks, which is supported. However, the Council is advised that pumping in the form of surface water pumps has been proposed and this inclusion should be reviewed. Pumping is not a sustainable solution to surface water discharge and should be avoided. The drainage strategy identifies that infiltration is not feasible due to inadequate space for infiltration systems. An assessment of exceedance flood flow routes above the 100-year event plus 40% climate change has been completed, showing finished floor levels above existing ground levels. However, the Council is advised that a plan showing the direction of exceedance flow routes (exceedance flow direction arrows) of site has not been provided.

## Digital connectivity

115. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6. The applicant should ensure prior to determination that sufficient space has been allocated to accommodate this requirement.

## **Environmental issues**

### Air quality

116. The development is located within an Air Quality Management Area and part of the site falls within an Air Quality Focus Area (Oxford Street from Marble Arch to Bloomsbury). The development would be Air Quality Neutral for both building and transport emissions, and would not lead to further deterioration of existing poor air quality. However, there is some concern that the proposed development includes new residential units at lower levels which will be exposed to poor air quality.
117. Recommended mitigation for the operational phase identified in the accompanying Air Quality Technical Note involves having no operable panels

provided (i.e. no natural ventilation). The design of a building where passive ventilation is prevented is not preferable in line with the cooling hierarchy in London Plan Policy SI4 and this does align with the recommendations set out within the accompanying acoustic report or energy strategy. Additionally, this inclusion does not deliver the highest quality of housing (London Plan Policy D6). The proposed development will have mechanical ventilation with heat recovery as the ventilation strategy and particulate matter filtration. However, this does not address the high levels of NO<sub>2</sub> concentrations predicted as NO<sub>x</sub> filtration has not been proposed.

118. As highlighted above, the site falls within an Air Quality Focus Area. GLA officers consider that the suitability of the site for the proposed use, in terms of the air quality exposure of the future occupants of the development has not yet been accounted for sufficiently. At present, the application does not acceptably respond to the requirements of London Plan Policy SI 1.

119. The following would also need to be conditioned if this application is approved:

- On-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards for Opportunity Areas (London Plan Policy SI 1(D)).
- Measures to control emissions during the demolition and construction phase relevant to a High risk site should be written into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase (London Plan Policy SI 1 (D)).
- Use of the backup generator(s) is restricted to emergency use and operational testing (less than 50 hours per year).

### Urban greening

120. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.3, which meets the minimum target set by Policy G5 of the London Plan. The UGF score should be secured through condition. The opportunity for the provision of biosolar roofing should also be explored.

### Biodiversity

121. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. The applicant has provided quantitative evidence that the proposed development secures a net biodiversity gain of 170.43% and that the trading rules are satisfied, in accordance with Policy G6. The biodiversity net gain should be secured.

## Local planning authority's position

122. Camden Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

## Legal considerations

123. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

124. There are no financial considerations at this stage.

## Conclusion

125. London Plan policies on land use, affordable housing, urban design, heritage and strategic views, transport, sustainable infrastructure and the environment are relevant to this application. The application does not yet comply with these policies, as summarised below:

- **Land use principles:** The site is located within the CAZ and the Tottenham Court Road Opportunity Area. The loss of visitor accommodation and the principle of redevelopment of the site for commercial-led, mixed-use development does not raise any issue in response to strategic policy considerations. Further information should be provided from the applicant in relation to the affordable workspace offer.
- **Affordable housing:** The affordable housing offer of 47.8% (habitable room) with a split of 58/42 in favour of low-cost rent would meet the 35% threshold set out within Policy H5 and is expected to follow the Fast Track Route. The affordable housing must be appropriately secured.
- **Urban design and heritage:** The development must demonstrate acceptable impacts as required by Policy D9(C) in relation to the tall building proposed. The development would result in varying degrees of less

than substantial harm to heritage assets and a total loss of significance from the demolition of the non-designated heritage assets at 16a, 16b and 18 West Central Street. A further reduction of the height and massing of the tower could reduce heritage harm. Comments in relation to site optimisation, residential quality, inclusive design, children's playspace should also be addressed.

- **Transport:** An Active Travel Zone assessment should identify necessary improvements within the vicinity. The new pedestrian route should always be publicly accessible and secured appropriately. Comments in relation to cycle parking and docking spaces, disabled parking, deliveries and servicing and construction logistics should be addressed with relevant items secured.
- **Transition to a zero-carbon economy and sustainable infrastructure:** The applicant should provide further response for GLA officers to reach conclusion on whether an appropriately thorough exploration of alternatives to demolition has been carried out. Unresolved comments on the energy strategy, circular economy, whole life-cycle carbon, sustainable drainage / flood risk and digital infrastructure should be addressed.
- **Environmental issues:** At present, the application does not acceptably respond to the requirements of London Plan Policy SI 1 in terms of air quality considerations. The urban greening factor and biodiversity net gain should be secured.

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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.