

Application ref: 2023/4586/PRE
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Katie Hughes
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London
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Dear Sir/Madam

Pre-application Minor Development Pre-application Advice Issued

Address:

124 Theobald's Road
London
WC1X 8RX

Proposal: Removal of parts of the building and erection of a seven storey front extension, new entrance extension, new windows on existing building, creation of new amenity spaces, landscaping and new bin and bike stores to the rear internal reconfiguration and consolidation of building cores follow up pre-app advice from 2018/2327/PRE and 2022/1669/PRE

Site constraints

- Article 4 Basements
- Contaminated Sites potential
- Buildings 18m+
- Archaeological Priority Area Tier 2
- Central London Area
- Knowledge Quarter
- TfL Underground Zone of Interest
- Local Plan Growth Area - Holborn
- Underground development constraint - Slope Stability
- Underground development constraint – Subterranean (groundwater) flow

Relevant planning history

Planning history for the site:

2018/2327/PRE - Mixed-use commercial-led scheme comprising 24,627sqm of office floorspace

(B1 Use Class) and circa 50 residential dwellings. The proposed scheme comprises the redevelopment of the existing building to provide a substantial uplift in office floorspace alongside new homes (Issued 19/07/2018)

2022/1224/P - Infill of existing atrium to provide additional office space. (CLEUD Granted 01/07/2022)

2022/1669/PRE - Refurbishment and extension of 124 Theobalds Road with the overall vision to offer new and additional office floorspace as well as high-quality residential units (Issued 09/09/2022)

Relevant policies and guidance

National Planning Policy Framework (NPPF) 2023

The London Plan 2021

Camden Local Plan 2017

Policy A1 Managing the impact of development
Policy A3 Biodiversity
Policy A4 Noise and vibration
Policy A5 Basements
Policy D1 Design
Policy D2 Heritage
Policy G1 Delivery and location of growth
Policy H1 Maximising housing supply
Policy H2 Maximising the supply of self-contained housing from mixed use schemes
Policy H4 Maximising contribution to affordable housing
Policy H6 Housing choice and mix
Policy C1 Health and Wellbeing
Policy C6 Access for all
Policy E1 Economic Development
Policy E2 Employment premises and sites
Policy CC1 Climate Change Mitigation
Policy CC2 Adapting to Climate Change
Policy CC3 Water and flooding
Policy CC4 Air quality
Policy CC5 Waste
Policy TC1 Quantity and location of retail development
Policy TC2 Camden's centres and other shopping areas
Policy TC4 Town centre uses
Policy DM1 Delivery and monitoring

Camden Planning Guidance

Amenity CPG 2021

Air Quality CPG 2021

Basements CPG 2021

Biodiversity CPG 2021

Design CPG 2021

Developer Contributions CPG 2019

Energy efficiency and adaptation CPG 2021

Employment Sites and Business premises CPG 2021
Housing CPG
Planning for health and wellbeing 2021
Public open space CPG 2021
Town Centres and Retail CPG 2021
Transport CPG 2021
Water and Flooding CPG

Site and surroundings

124 Theobalds Road is the third in a series of six large plots, each occupied by a single, large-scale commercial building isolated by the tight grid of narrow secondary streets that run north of Theobalds Road. It has a monumental scale given emphasis by the classical simplicity of its relatively unornamented facades and regular pattern of large window openings. It was built in 1955 to the design of Gordon Jeeves, an eminent and prolific architect who collaborated on many landmark buildings in London. The quality of this building is evident from the use of the well detailed, Portland stone facing material.

The current building on site was redeveloped in 1955 for Cable & Wireless as their headquarters building. It was named Mercury House after the Roman god.

The building was designed by Stanley Gordon Jeeves and inspired by earlier Art Deco buildings, in particular Charles Holden's 55 Broadway for London Underground. Both buildings feature ornamental carvings. On Mercury house, relief plaques are found above the transoms of the god Mercury by Arthur Cousins. The building interiors were by H C Upton, Cable & Wireless's own architect. The three glass panels in the entrance were the work of John Hutton.

The architect Stanley Gordon Jeeves was an eminent and prolific architect who collaborated on many landmark buildings in London, such as the National Radiator Building, Berkeley Square House, the Earls Court Exhibition Centre and Dolphin Square

Like those to the east, west and south this is a post war development on a bomb clearance site which led to the loss of the smaller plots and finer grained Georgian terraces. The site falls outside the Queen Square/Red Lion Square sub-area of the Bloomsbury Conservation Area. The building is also within the LVMF limits and views.

ASSESSMENT

The principal planning considerations are the following:

1. Land Use
2. Design
3. Neighbouring Amenity
4. Transport
5. Energy and sustainability
6. Air quality
7. Community Infrastructure Levy

1. Land use

In relation to employment use, policies E1 (Economic development) and E2 (Employment premises and sites) and CPG *Employment sites and business premises* encourage the provision of employment uses such as offices (Class B1).

Policy E1 aims to secure a successful and inclusive economy in Camden by creating the conditions for economic growth to support residents and local businesses. This is achieved through maintaining premises that are suitable for a variety of businesses, supporting local enterprise and business, promoting Knowledge Quarter as a location and directing new offices to growth areas.

The site is located in the Central London Area and therefore inside a Local Plan Centre where these types of uses are funnelled to. The redevelopment would provide the same uses on site (Class E) but expand the floor space considerably by 390sqm. With reference to policy E1 above this secures a significant increase of office and retail space in a growth area which the policy aims to direct it to, encourages concentrations of technical/professional services and directs office.

Mixed use policy

Policy H1 of the Local Plan aims to secure a sufficient supply of homes to meet the needs of existing and future households and will seek to exceed the target for additional homes in the borough by regarding self-contained housing as the priority land use of the Local Plan.

The London Borough of Camden Housing Delivery Test Action Plan (August 2021) notes that in 2020, the Council delivered 79% of homes compared to its target, hence the need for an action plan. The latest figure for the 3 years up to 2021 is 76%.

Policy H2 of the Local Plan promotes the inclusion of residential development where non-residential development is proposed as part of a mix of uses. The Council will consider the character of development, size of the site, Local Plan priorities and whether or not the proposal serves a public purpose. Policy H7 of the Local Plan aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.

Policy H2 applies to all proposals for new build non-residential development and extensions involving a significant floorspace uplift. The policy also applies to non-residential uses including hotels and visitor accommodation. In the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where development involves additional floorspace of more than 200sqm (GIA), we will require 50% of all additional floorspace to be self-contained housing.

The application site is located within the Central London Area and as such, the scheme is the type that relates to this policy and the Council would expect this to be thoroughly explored as part of any future planning application. Based on a GIA uplift of 390sqm, a policy compliant scheme would provide 195sqm of onsite housing.

A mixed use analysis has been provided in the submitted documents which seeks to justify the inability for the scheme to accommodate housing. A policy compliant scheme would mean that one or two units should be provided as part of the development. The updated pack shows the units located around the building with a focus to the rear of the site.

It is clear that the uplift is small as part of this development and attempting to provide housing in the existing building seems to compromise the overall scheme and the benefits of providing high quality office accommodation. Issues of daylight, privacy, and amenity space, the single aspect nature, additional stair/lift core and impact on the services area mean that providing residential accommodation on site would be difficult.

Affordable Workspace

Limited details have been provided in relation to the amount and nature of affordable workspace for the site. Further details and examples can be found in Camden's CPG for [Employment sites and business premises](#). If the project is to be taken forward then further information will have to be provided on this and it is recommended that examples of approved schemes within close proximity are looked into with a view to understand Council expectations.

Whilst it does include an uplift of only 390sqm which does not meet the requirement for AW in terms of policy, the scheme is large and will ultimately provide a much higher quality of accommodation. The scheme should attempt to look into Affordable Workspace and see if this can be provided.

2. Design

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 requires extensions to consider the character, setting, context and the form and scale of neighbouring buildings, and the character and proportions of the existing building. Camden's design policies are supported by Camden Planning Guidance Design.

The building is considered to be well-designed and contributes positively to the townscape of Theobalds Road where its staggered plan with two wings offset from the central section of the building allows the building to respond well to the angled southern site boundary. The building line and set back forecourt provide valuable 'breathing space' to the public realm on a frequently constrained footway adjacent to a wide and heavily trafficked carriageway.

It also relates well to the adjacent housing sites to the north where the broken massing of the form allows the building to relate to the finer grain of the narrower streets. The wings broadly conform to the scale and orientation of the street facing Georgian terraces and residential buildings to the north.

The design includes modernising the building to create a more rational floor plate and improve the commercial accommodation on site. The start of this process is to remove the 1990's additions which include:

- Entrance to the front
- Balcony and roof to the front
- 5th Floor enclosure
- Atrium
- Plant enclosure

As demonstrated during the meeting, these elements contribute little to the character of the building, are non-original and can be removed to aid this process. Overall this is supported.

The scheme also includes alteration the building cores and floor plate in order to make use of the corners and edges which have been previously neglected due to the compromised or poor quality nature. This means that more of the existing floor plate can be used more efficiently. Whilst it is appreciate this is mostly internal works officers welcome this move which can facilitate less development on site.

Front Extension

The proposed extension infills the front of the building and creates a 'T' like shape which covers the central façade and overlays the two primary street elements to the left and right. The extension is not above the maximum height of the building and does not bring the building forward significantly. Overall the scale and massing of the extension sits comfortably within the buildings proportions and still retains the stepped façade character the building has. The increase of terraces as a consequence of the extension is acceptable considering the existence of the terraces in similar locations.

In terms of detailing and materials, the extension establishes a five bay rhythm and has a three bay structure with balconies that extends beyond. The window sizes are appropriate and the proportions of the fenestration details fit well with the building. The use of Portland Stone, which matches the existing building is supported as opposed to other infill examples in the area which have used glass less successfully. The use of stone, along with the detailing which is inspired by building helps create a good quality extension which both fits in well with the building but successfully has an architectural character of its own.

Where the extension meets the terraces to the side, the rich architecture appears to stop and officers would question this move and why this happened.

The strong vertical architecture is rich and has several interesting details including curved edges, strong recessed windows and lintel detailing which is all positive and contributes to a well-designed extension. As discussed in the meeting, this is a really good starting point and further tweaks can be made to ensure this is something of distinctly high quality.

Landscaping / rear

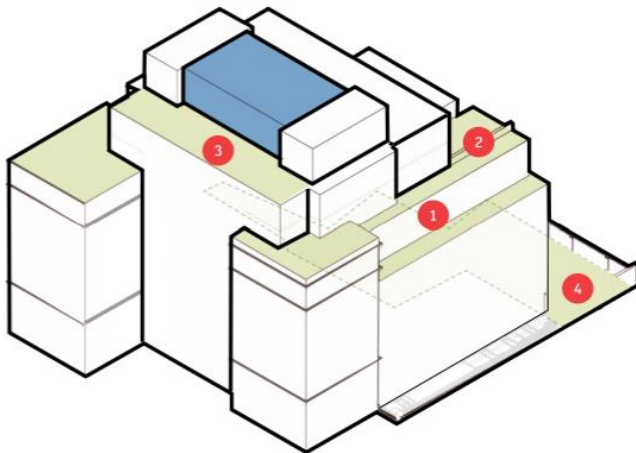
The rear service yard is being re-developed with new cycle and bin stores, entrances down to the basement. Whilst this appears to be in the early stages, the principles of the proposals are accepted and helps link the building up much better. As stated in the meeting, I think there is an opportunity here to ensure that green infrastructure, planting, and landscaping can be really developed in this location to create a high quality space which contributes to biodiversity, has an increased level of greening and provides places for employees to enjoy.

Fenestration

In relation to fenestrations of the building, much of the ground floor windows and doors have been either been removed or bricked over. As part of the proposal, the idea is to uncover the old windows and reinstate the windows and doors to the front. This is to ensure that the office space on the ground floor can be used and has a good level of outlook and light. This move to reinstate these windows is supported and helps 'open' up the building to its public facing sides.

Balconies

New balconies are being created to the front side and rear. During the meeting it was confirmed that no new terraces are being created to the rear however page 49 of the pack suggests otherwise (see below)



Proposed

1. Create outdoor amenity space to all existing setbacks
2. New rear terrace on Level 7
3. New communal roof terrace on level 9
4. Enhance rear yard landscaping
5. Increase biodiversity on site with soft landscaping

As with the rear service yard how these are design is important to the success of the appearance of the building. All of these terraces are in quite prominent locations and so moving forward the Council will expect a good level of design incorporated into the terraces. Elements including seating, planting and how they can improve biodiversity are really important to success of these terraces but also their overall appearance. There are some 'greened' lightwells proposed in the basement which appear also to be amenity spaces and so more information about what greening and how these will look would be useful.

3. Neighbouring Amenity

Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The factors to consider include visual privacy, outlook; sunlight, daylight, and overshadowing; artificial lighting levels; noise and vibration; odour, fumes, and dust; and impacts of the construction phase, including the use of Construction Management Plans.

The proposed extension is to the front meaning any impact on outlook, privacy, enclosure, daylight/sunlight is unlikely to be significant due to the distance the building is away from neighbouring and opposite buildings. Moreover the proposal includes the removal of some of the highest elements of the building and the overall height is being reduced as a consequence of this proposal.

The buildings directly adjacent are commercial buildings and so increasing the openings on ground floor will not have an impact on amenity.

The Tybald's Estate is located to the rear and there is apparently a new terrace located to the rear. Therefore increased level of overlooking could occur and so an assessment on these impacts should occur to ensure the level is not adverse.

To ensure this impact is not significant and has been fully assessed a preliminary daylight/sunlight assessment should be support any application and other amenity topics should be covered in the DAS/Planning statement.

Construction Management Plans are discussed in the 'Transport' section.

4. Transport

Policy T1 aims to promote sustainable transport by prioritising walking cycling and public transport. This is achieved by improving pedestrian friendly public realm, road safety and crossings, contributing to the cycle networks and facilities and finally improving links with public transport. All these measure are in place to ensure the Council meets their zero carbon targets.

Policy T2 limits the availability of parking in the borough and requires all new developments in the borough to be car free. This will be done through not issuing par permits, resisting development of boundary treatments and using legal agreements to secure these actions.

Site location and access to public transport

The site is located in the Central London Area and is bounded by Theobald's Road to the south, New North Street to the east and Boswell Street to the west. Theobald's Road forms part of the Strategic Road Network (SRN). The Council is the highway authority for these roads and is therefore responsible for their maintenance. However, TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.

The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent).

Holborn and Russell Square (London Underground) stations are located approximately 300m metres south and 700m north of the site, respectively.

The closest bus stops, named Red Lion Street and Red Lion Square, are located approximately 100m east and south of the site, providing services to central, north and east London.

The site is easily accessible from the Strategic Cycle Network, with Cycleway C41 on Lamb's Conduit Street offering connections to High Holborn to the south, and St Pancras and Euston Railway stations to the north.

The nearest Santander cycle hire docking station is located nearby on Red Lion Square. This location also offers a dedicated parking bay for dockless rental e-bikes and rental e-scooters. However, this bay is already showing signs of overcapacity and increasing demand. The Council has plans to expand the network of bays in the area and it is hoped that additional bays could be provided in the future via developer contributions.

Trip generation

The proposal will increase the floor area by 390sqm to 12,238sqm. It is unclear if or how this will affect staff and visitor levels.

The applicant is requested to provide a full Transport Assessment, including a trip generation analysis and mode share amongst staff and visitors, by surveying the existing site, and also by interrogating the TRICS database for comparative purposes, and the Active Travel Zone (ATZ) assessment in line with the TfL Healthy Streets guidance.

Based on other developments in the area, it is anticipated that a high volume of the walking trips is likely to be made from Russell Square and Holborn (London Underground) stations, the bus stops on Theobald's Road and Red Lions Square, and also from the rail stations at St Pancras, Euston, and King's Cross.

Travel planning

The applicant is requested to submit a staff Travel Plan with any future application to demonstrate a commitment to encouraging and promoting trips by sustainable modes of transport. A travel plan targeted towards staff and visitors would outline aims and objectives, active travel targets, action plan and monitoring.

A travel plan covering and an associated monitoring and measures contribution of £11,221 will be secured by legal agreement if planning permission is granted.

Access and permeability

The main pedestrian access is from Theobald's Road, where it is proposed to enhance entrance experience and increase permeability.

The site benefits from two vehicular crossovers on Theobald's Road. It is not clear if these are presently used to provide vehicular access to the main entrance. Could the applicant clarify if they are proposed to be retained, and if so, for what purpose?

A dedicated cycle entrance will be provided off New North Street. This entrance point also appears to provide access to one accessible parking bay and servicing vehicles. The applicant is requested to clarify how any potential conflicts between the cyclists and motorised vehicles will be managed at this location and within the site.

Cycle parking

The Council requires high quality cycle parking to be provided in accordance with Local Plan Policy T1, CPG Transport, the London Cycling Design Standards (LCDS), and London Plan Policy T5 for and B1 use (business offices):

- 1 space per 75 sqm (GEA) long stay,
- first 5,000 sqm 1 space per 500 sqm, thereafter 1 space per 5,000 sqm (GEA) short stay.

184 long stay and 28 short stay cycle parking spaces are proposed. It is not clear what cycle parking system are proposed, however, it is requested that a min of 20% provided are Sheffield stands.

The long stay cycle storage is located in the basement level, accessible via stairs with cycle ramps on either sides or a new cycle/refuse lift. It is considered that this type of a lift provides the most optimal solution, because it may deter some cyclist from using and storing their bikes. The applicant is requested to explore options of providing a dedicated cycle lift.

With regards to access, paragraph 8.16 of CPG Transport states: *'The route to cycle parking from street level must be step free. If level access is unachievable, the cycle parking must be accessible via a ramp or a lift that is adequate in size to accommodate a cycle and its user. Lifts should measure a minimum of 2m x 2m, although where many users are likely to arrive at a similar time, for example at a large office development, lifts will not be an acceptable option, as convenient access would be compromised.'*

The applicant is requested to submit a cycle parking proposal compliant with the aforementioned standards with any future application.

Car parking and vehicle access

The site is located in controlled parking zone CA-E/D, which operates 08:30-18:30 Monday to Friday and 08:30-13:30 on Saturday.

One disabled bay is proposed within the site. Upon a formal submission the application should provide a swept path analysis, demonstrating that a vehicle can enter and exit the site in a forward gear. The applicant is also requested to provide an electric vehicle charging point (EVCP).

Construction management

Construction management plans are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works).

The site is located on Theobald's Road which forms part of the Strategic Road Network (SRN), and is in close proximity to strategic cycle route network. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc.). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

The applicant is requested to submit a draft Demolition Management Plan (DMP) and a draft Construction Management Plan (CMP) using the Council's CMP pro-forma with any application. The pro-forma can be found on Camden's website.

More detailed DMP and CMP documents will also be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted.

The development will require input from officers at demolition and construction stage. This will relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction.

Implementation support contributions of £29,943 and impact bonds of £31,497 for the demolition and construction phases of the development works will be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission were granted.

A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction will also be secured by legal agreement if planning permission is granted.

Deliveries and servicing

The applicant is requested to submit a draft Delivery and Servicing Plan (DSP) with any future application, which should provide information on:

- Projected servicing trips.
- Type and size of servicing vehicles.
- Location, frequency, and duration of servicing.
- Routing of servicing vehicles to and from the site.
- Dwell times.

A more detailed DSP will be secured by legal agreement if planning permission is granted. This will help to ensure that any operational impacts associated with delivery and servicing movements could be mitigated.

Transport Assessment

The applicant is requested to provide a previously mentioned Transport Assessment (TA).

Highway works

If the existing crossovers on Theobald's Road were to be removed, the applicant would be financially responsible for any works relating to the highway. The Council may therefore seek to secure a highways contribution to make any changes or repairs to the public highway in the direct vicinity of the development. This will be secured by legal agreement if planning permission is granted.

It is not known if the proposal would require any physical alterations to the public highway. However, it is suggested that a modest highways contribution of £20,000 towards repairing any damage potentially caused to the public highway during demolition and construction is secured by legal agreement, if planning permission is granted.

Pedestrian, cycling and environmental improvements

The Council is developing proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists. The estimated cost of delivering these proposals, which will be delivered under the Holborn Liveable Neighbourhood (HLN) scheme is currently estimated as circa £40M including fees, subject to detailed design. Under Objective 1 of the CTS, which is to "transform our streets and places to enable an increase in walking and cycling", we have set out "investment priority" schemes – these being schemes which "identify priorities for this objective where we will require substantial additional funds, including inward investment & partnership in delivery from TfL/ other relevant organisations, in the short to medium term, to help realise these overall goals." One of those investment priorities is "Unravelling the Holborn gyratories and reducing traffic dominance as part of an area wide 'Liveable Neighbourhood' project that enables active travel modes."

The Council will therefore seek to secure financial contributions towards the overall scheme costs from development funding. Construction of the HLN scheme will take place as funds become available. Implementation of some changes to roads in the area is likely to start in 2024 using secured funding, with each subsequent phase of construction subject to financial approval as funding becomes available.

Given the site location in Holborn, a financial contribution of £50,000 towards the Holborn Liveable Neighbourhood (HLN) scheme would be sought if planning permission is granted. This is in line with other similar developments in the area and would be secured by legal agreement.

It is also worth noting that Theobald's Road will be a "primary" segregated cycle corridor within the Holborn LN, and we will be seeking financial contribution towards this scheme.

The requested ATZ assessment will confirm locations in the HLN scheme area where enhancements to the pedestrian and cycle environment would be of particular benefit to the proposed development, and towards which further contribution may be sought.

An increase in cycle and walking trips generated by the development and further promoted by the requested Travel Plan is likely. The applicant is requested to note that the Council has an ambitious CTS Delivery Plan 2022/23 - 2024/25 which is expected to be delivered through various sources, including via developer contributions.

The level of financial contribution to be sought will be determined once a planning application has been submitted.

Micro mobility improvements

Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area. Officers anticipate significant demand for more parking bays to be provided in the area should planning permission be granted. A cycle/e-scooter hire improvements contribution of £10,000 would therefore be secured as a Section 106 planning obligation if planning permission is granted. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by bus.

5. Energy and Sustainability

The Council requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The Council promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy.

Policy CC1 requires all development to reduce carbon dioxide emissions by following the steps in the energy hierarchy; supports and encourages sensitive energy efficiency improvements to existing buildings; and expects all developments to optimise resource efficiency.

Policy 5.2 of the London plan requires development to be designed in accordance with the energy hierarchy: be lean (use less energy), be clean (supply energy efficiently), be green (use renewable energy). In addition chapter 5 of the London Plan sets out the need for schemes to secure a minimum 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013. The Council expects zero carbon development, with at least 35% reduction to be made on-site. A carbon offset contribution would be required for the shortfall. This would be used to secure the delivery of carbon reduction measures elsewhere in the borough.

You are also advised to consult GLA guidance. The final draft of the GLA's Circular Economy Statements (CES) Guidance has recently been published which states that "If there are existing buildings on a site, a third-party, independently verified or peer-reviewed pre-redevelopment audit is strongly encouraged, including analysis that fully explores options for retaining existing structures, materials and the fabric of existing buildings into the new development; and the potential to refurbish buildings before considering substantial demolition."

Also from the CES Guidance:

If substantial demolition is proposed, the pre-demolition audit should include the following core information:

• An explanation as to why it is proposed that the building(s) be demolished. Applicants should explain the different considerations for developing the site. This should go beyond simply saying that the buildings are of 'low quality'. Justification for demolition should be provided, in line with the approach set out in sections 2.4.3 to 2.4.5, above. An assessment of carbon impacts should be highlighted and, where relevant, the WLC assessment should be cross-referenced. It should be explained how any negative impacts resulting from demolition, such as the loss of embodied carbon in existing buildings, would be mitigated and offset.

At this point the principle of demolition is accepted as the majority of demolition is taking place internally as part of the redevelopment. There are some elements of the building being removed however these are small, later additions and their removal benefits the overall use and sustainable performance of the building. Therefore as this has been accepted, you are also required to submit:

- Whole Life Carbon Assessment
- Resource efficiency plan
- Circular economy statement (required for referable applications)
- Pre-demolition audit

It is necessary to understand resource efficiency when comparing the overall impact of a new development with that of refurbishing an existing building. The stages to assess include:

- production of materials and components (raw material extraction, material production, wastage and waste processing, transportation)
- construction stage (transport, storage of products, wastage and waste processing, energy and water use in construction, ancillary materials)
- use stage (energy and water used in operation, maintenance, repair, replacement and refurbishment)
- end of life stage (de-construction or demolition, transport, waste processing, disposal of waste).

When comparing the carbon impacts of a new development and a refurbished scheme, the applicant should include the following within the scope of the assessment:

Refurbished scheme	New development
Embodied carbon of any <u>new</u> materials used within the refurbishment (do not include the carbon content of the existing building materials as these are considered 'spent').	Embodied carbon of all materials used within the development.
Expected operational carbon emissions of the refurbished scheme over the expected lifetime of the building (60 years is typical)	Expected operational carbon emissions from the new scheme over the expected lifetime of the building (60 years is typical)

Embodied carbon is calculated by finding the quantity of all materials needed for the building's lifetime and multiplying this by the carbon factor (expressed in kg CO₂e per kg of material/product) for each material to produce the embodied carbon figure. Please refer to policy CC1 (e) and CPG Energy efficiency and adaptation.

Where the demolition of a building cannot be avoided, we will also expect developments to divert 95% of waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site.

Developments are also expected to implement the sustainable design principles as noted in policy CC2 by achieving a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

Policy CC2 requires all development to adopt appropriate climate change adaptation measures such as:

- A. the protection of existing green spaces and promoting new appropriate green infrastructure.
- B. not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- C. incorporating bio-diverse roofs, combination green and blue roofs, and green walls where appropriate; and
- D. measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

More details regarding the sustainable performance and carbon targets should be provided throughout the pre-app process.

Biodiversity Net Gain (BNG)

Biodiversity net gain (BNG) is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. In England, biodiversity net gain (BNG) is becoming mandatory under [Schedule 7A of the Town and Country Planning Act 1990 \(as inserted by Schedule 14 of the Environment Act 2021\)](#).

Developers must deliver a biodiversity net gain of 10%. This means a development will result in more or better quality natural habitat than there was before development.

This will need to be considered as part of the proposal moving forward.

Retrofitting the building with more energy efficient measures to minimise energy consumption (draught-proofing, thermally efficient windows and insulation) should be considered and involved as part of any refurbishment works.

The Council will also seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible, through the incorporation of water efficiency measures (policy CC3).

Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rain water and grey water on-site.

Policies D1 and CC2 of the Local Plan encourage sustainable urban drainage systems, green roofs and walls and high quality hard and soft landscaping. The inclusion of a green roof is therefore welcomed.

6. Air Quality

This location is in an area of very poor air quality. Camden Local Plan policy CC4 and CPG Air quality is relevant with regards to air quality. A detailed air quality assessment and the Council's Air Quality proforma would be required for assessment.

A detailed AQA should (in line with guidance in CPG Air Quality) cover the following:

- Operational impact of development on local area
- Include AQ Neutral assessment
- Operational impact on occupants
- Construction impacts risk assessment

This will need to be accompanied by an Air Quality proforma.

Other points to consider:

- It should be noted that modelling should not predict improvements to future years (future vehicle emissions or future background concentrations). In line with London Council's Air Quality and Planning Guidance appropriate mitigation must be considered for residential developments if NO₂ is between 5% above or below the national objective for residential developments or schools (APEC-B) and refusal should be anticipated if more than 5% above (APEC-C). For commercial developments more than 5% above best endeavours to reduce exposure should be incorporated.
- WHO standards at the time of writing of the London Plan 2021, specifically 20 µg/m³ for PM₁₀ and 10µg/m³ for PM_{2.5}, should be considered.
- If MVHR is proposed, air inlets should be located away from busy roads or any other emission sources and as close to roof level as possible, to protect internal air quality.

CONCLUSION

It is considered that the issues of land use and housing is considered acceptable with the overall massing significantly improved sitting a lot more comfortable in relation to facing onto Theobalds Road. More information is required regarding the terraces, landscaping and sustainability.

Given the sensitive nature of the site itself, it is recommended you begin early consultation and engagement with local resident groups, societies and the CAAC to ensure local stakeholders are consulted.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable, nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

If you have any queries about the above letter or the attached document, please do not hesitate to contact **Ewan Campbell**

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

It is important to us to find out what our customers think about the service we provide. To help us in this respect, we would be very grateful if you could take a few moments to complete our online survey at the following website address: www.camden.gov.uk/dmfeedback. We will use the information you give us to help improve our services.