West Central Street

DSDHA

Clarifications and Responses on Demolition Justification including Pre-Redevelopment Audit and Retention options appraisal

October 2023

Contents

Purpose of the report

This document relates to planning application 2023/2510/P and has been compiled in response to feedback from the GLA Stage 1, LB Camden officers and their 3rd Party technical reviewers. In particular the queries relate to how the proposals address the requirements of specific policies;

- GLA Circular Economy Statement LPG 2022
- LB Camden Local Plan 2021policy CC1
- Camden Planning Guidance (CPG) Energy Efficiency and adaptation (January 2021).

This document brings together content and analysis from the planning application submission along with further detail and clarification where required. It demonstrates our understanding of the existing buildings and how we've established this through many in depth surveys and detailed analysis of the existing buildings. It should be read in conjunction with the following planning application documents:

- DAS Section 7.0
- Heritage statement
- Retention and Redevelopment Options Appraisal and Whole Life Carbon comparison
- Circular Economy Statement
- Pre Demolition Audit (updated September 2023)

The document is in two parts:

- Part 1 of this document sets out the detailed work carried out to understand the site, the buildings, their component parts and the condition and performance of those elements. This has informed the approach to retention and to demolition and has resulted in the proposals that are set out in the application.
- Part 2 brings together the options analysis that was carried out and the policy context that informed these options, specifically how options were narrowed down to more detailed review including WLC (in the case of Selkirk House) and ultimately resulted in the selected proposals.

Part 1

Clarifications and Responses on Demolition Justification including Pre-Redevelopment Audit and Retention options appraisal

1.0 Introduction

1.0 Introduction

This section addresses the pre-redevelopment audit requirements set out in the GLA Circular Economy Statement LPG (2022) for the application.

This section brings together content from the application documents plus additional clarification as required.

Scope of pre-redevelopment audit

The GLA Circular Economy March 2022 seeks a pre-redevelopment audit to be carried out on referable scheme. The guidance states that “a pre-redevelopment audit is a tool for understanding whether existing buildings, structures and materials can be retained, refurbished or incorporated into the new development.”

The guidance proposes the scope of the pre-redevelopment audit to cover

- An explanation of the existing buildings on the site including
- Brief description of their state of repair

To include:

- The building’s age
- Key materials
- Photos of typical internal spaces and facades
- Site plans

1.0 Introduction

Existing Site Plan

There are two constituents part of the Site:

1. West Central Street block:
Buildings range between one and four storeys and is located within the Bloomsbury conservation area and are identified as positive contributors. The buildings that form part of the proposed scheme are:

- Nos 35-37 and 39-41 New Oxford Street
- Nos. 10- 12 Museum Street
- 16a, 16b and 18 West Central Street

2. Selkirk House
The existing Selkirk House tower, podium and basement, including the NCP car park This is the larger of the two blocks and it includes a tall hotel building (Selkirk House). It lies outside the Bloomsbury CA.

The public realm also forms part of the Site, including the pavements adjacent to the site boundary and all of the West Central Street.

For scaled site plans, please refer to this application's planning drawings:

- 295_P10.002 Exiting Site Plan
- 295_P20.003 Proposed Site Plan

Existing Site Plan (Showing West End Project Improvements)

2.0 Investigations and Surveys Undertaken

2.0 Investigations & Surveys Undertaken

The applicant has undertaken a substantive number of surveys and investigations to understand the existing building conditions across the site and inform the planning and listing building applications. A summary of their detailed building survey findings for Selkirk House and West Central Street can be found in the following pages:

Survey	Responsible Party	Intrusive
Measured survey - MS	CSL Surveys	N/A
Measured Survey - WCS	CSL Surveys	N/A
Topographic Survey	CSL Surveys	N/A
Geo-tech and environmental desk top study	A Squared (Meinhardt)	N/A
WCS - Photographic Survey for Planning	Raw Architecture	N/A
CCTV of sewers and connections	Survatec	N/A
Royal Mail - Line and level survey of post office tunnels	Socotec	N/A
Ecology Survey (+ bat emergence survey)	BHSLA (Biodiveristy by Design)	N/A
Bat emergence survey	TMA	N/A
Asbestos Survey - MS	Erith	Y
Asbestos Survey - WCS	Erith	Y
Opening up works - MS	Erith	Y
Opening up works - WCS	Erith	Y
Trail Holes	As part of opening up works	Y
Core holes	As part of opening up works	Y
Petrol tank survey	A Squared (Meinhardt)	N/A
GPR Survey (existing underground services) + slit trench survey (including trial holes to identify utilites)	MK Surveys	Y
Basement Impact Assessment	A Squared (Meinhardt)	N/A
UXO survey	Jomas Associates Ltd	N/A
Ventilation void survey	Hutton + Rostron	N/A
Ground Investigation (based on opening up works)	Jomas Associates Ltd	Y
TTC Audit of Heritage Features	TTC	N/A
Technical Due Diligence Survey (TDD) - Selkirk House	TFT	N/A
Sampling and Testing of Concrete - Selkirk House	Sandburg Consulting Engineers	Y
Technical Due Diligence Survey (TDD) - 16-18 West Central Street, 10-12 Museum Street, 35, 37 & 39-41 New Oxford Street, London WC1V	TFT	N/A
Environmental Due Diligence Survey - Selkirk House and West Central Street	Waterman Infrastructure & Environment ltd	N/A
Survey of Fire Hose Reel - Selkirk House	Dry Risers Direct	N/A
Survey of Facades at 16-18 West Central Street, 10-12 Museum Street and specification for repairs	WhiteStone Essex Limited	N/A
Photographic record of facades at 16-18 West Central Street, 10-12 Museum Street	TFT	N/A
Photographic record of facade repairs at 16-18 West Central Street	WhiteStone Essex Limited and Bradford Watts	N/A
Photographic record of netting facades at 10-12 Museum Street	Bradford Watts and London Pro Absailing Ltd	N/A
Photographic Record of concrete to be descaled in Car Park	Bradford Watts	N/A
Report on Selkirk House Fire Alarm	Global Fire and Security	N/A
Report on drainage in Car Park including CCTV Survey	R.O.D Drain Techs Ltd	N/A
Non-intrusive, visual inspection of the existing screening to Selkirk House perimeter at roof parapet level	The Budgen Partnership	N/A

2.0 Investigations & Surveys Undertaken

Selkirk House

Building

1. The property has been extensively stripped out including removal of brassware, toilets and sinks from the hotel bedrooms. Additionally, significant elements of the building services installations have been removed, presumably for their scrap value or reuse elsewhere. Card access door locking systems have been removed from hotel doors. In its present state, the building should be regarded as suitable for demolition or commencement of substantial refurbishment. Recommissioning the building from its present state to enable reuse is likely to prohibitively costly.

2. The property has been subjected to a fairly widespread destructive opening-up to screen for the presence of asbestos containing materials. As a result, most internal wall finishes, joinery elements, flooring and fittings have been damaged. Permanently repairing this would be a significant task although for the purposes of this report, we have assumed that you would completely refurbish the property if it were retained.

3. Structural floor to ceiling heights are typically 2.85m within the hotel tower which is approximately 0.5-0.8m lower than present day requirements for office buildings. This may restrict the flexibility of the core structure to support office uses in future unless a very compromised finished floor to ceiling height can be tolerated.

4. The perimeter elevation cladding at roof level has been supplemented with steel support straps and bolts. It is evident that some of the original semi-concealed fixing clips which secure the panels are missing; the precise cause of this is unknown, but it is possible that the cladding was installed in this way. The supplementary fixings are corroded in places and fix into the panel face rather than the thicker flange at the edge. Additional fixings should be provided as a precautionary measure immediately, although we note that any significantly compromised panels would have become dislodged during the recent winter storm events in the UK

5. The extent of destructive opening up completed by others enabled us to confirm that there are no visible cavity barriers around windows. The original elevations have been overclad and there are substantial voids between the original concrete panels and cladding added in 2005. In its empty state, this is not considered to be overly problematic, although there would be little/no resistance to the passage of smoke and fire between floors. As such, it would be necessary to insert cavity barriers around windows and potentially elsewhere throughout the façade if the building was to be reoccupied. This would involve temporary removal of the cladding system which clearly would be a substantial task.

6. The level 2 car park roof is flooded and holding an extensive amount of water. The roof over level 3 also has a substantial amount of standing water, with evidence of the pooling covering a larger area. We suspect that the drainage is blocked beyond the outlets as evidence of leaks and modifications are present to the drainage installation throughout the car park. The standing water needs to be cleared immediately and the drainage system overhauled to allow rainwater to disperse from the roofs. Whilst the majority of the GRP roof covering appears to be intact, the flooding may have caused premature deterioration, therefore, repairs should be anticipated in the medium term.

7. Water ingress is present through many of the construction joints of the car park, particularly at the southern end, which risks damage to the concrete structure. The above mentioned flooding may also be exacerbating the issue. The source of the leaks need to be investigated and remedied to prevent ongoing deterioration. Further investigation may also be required to assess the level of damage to the concrete from the leaks and to determine the level of repairs required. You have appointed Sandberg to undertake concrete testing at the site and we would also refer you to their advice in this regard.

8. The car park presents in overall poor condition, consistent with the rest of the building. There are several health and safety issues present, such as missing linear drainage covers causing trip hazards, absence of lighting to the lower levels, redundant materials and remnants of site investigations present. A wholesale refurbishment will be required if the car park is to be recommissioned.

9. Isolated areas of cracking around the car park construction joints is evident in some locations. This may have been induced through vehicular traffic vibration as there are no visible movement joints incorporated into the structure. The aforementioned water ingress may also be a contributing factor. Localised areas of cracking and damage is also present elsewhere to the concrete mullions forming the level 3 cladding, overhead beams and cladding panels, some of which has exposed the steel reinforcement. Further investigations are required to establish the cause of the defects as a precursor to undertaking the any remedial repair works. Sandberg's investigations have not identified any significant deleterious content in the concrete, so it is considered that the defects noted are age related and require corrective maintenance only.

10. There is evidence of intrusive investigations being carried out throughout the car park. We anticipate that these have been undertaken to inform the vendors redevelopment proposals for the site, as opposed to investigating concerns with the structure in its current form for safe use. However, the vendor must confirm that this is the case.

11. There is evidence of rough sleepers occupying the main building and car park, although, no one was present at the time of our inspection. 24/7 skeletal security provision is present on site through the provision of two security guards based on site. The vendor must confirm instances and frequency of unauthorised access at the site. Consideration needs to be given to improving the security provisions to prevent further ingress attempts/occurrences.

Services

12. The cold water booster set and boilers providing domestic hot and cold water services to the hotel and apartments have been removed along with elements of distribution pipework. No domestic hot or cold water is therefore currently available within the hotel or apartment areas of the building. It is currently unknown if the pipework has been fully drained. Further intrusive investigations are required to identify the condition of hot and cold water pipework and its suitability for retention.

2.0 Investigations & Surveys Undertaken

Selkirk House

13. Hotel supply and extract ventilation fans located at podium roof level are in poor condition and were not operational at the time of survey. The equipment is close to the end of its economic serviceable life and would only offer a potential for retention if serving an unaltered use type and layout.

14. Hotel direct expansion (DX) cooling systems located on the podium roof and serving the lower reaches of the hotel (management offices, reception, etc) were not operational at the time of survey. The equipment is beyond economic serviceable life and unlikely to be fit for retention.

15. The sprinkler installation serving the basement of the hotel and car park levels was in poor visual condition. It is currently unclear if the sprinkler system is operational however servicing labels are present (last dated December 2021). During our inspection the sprinkler valve room appeared to have a water leak and included redundant equipment such as a non-operational pump. Further extensive and intrusive investigations are required to identify the condition of the sprinkler system and any required remedial works/repairs.

16. Wall mounted electric heaters have been disconnected and/or removed from a significant number of hotel guestrooms. It is unknown if the remaining heaters are operational during winter months for fabric protection. As a minimum, heating for fabric protection should be reinstated in the short term.

17. Despite the property being unoccupied, routine testing and maintenance should be carried out on lighting, emergency lighting, and fire detection and alarm installations to ensure a base level of safety and protection is afforded at all times. Large areas have been left without lighting (including basement car park levels which do not benefit from any natural daylight) while the fire detection and alarm panel had faults and disablements present at the time of survey. These installations must be inspected and tested immediately to identify and action all required repairs.

18. The main electrical distribution infrastructure throughout the property appears to predate the conversion to hotel. The infrastructure presents as dated and contains equipment that is obsolete. Elements also appear redundant but have been left in situ. Subject to thorough testing and inspection in may be feasible to retain equipment to serve the short to medium term, however any long term plans will require renewal of the main electrical distribution infrastructure.

19. The part strip out and removal of mechanical and electrical plant and equipment appears to have been undertaken in an uncontrolled, and possibly unauthorised, manner. The building should be thoroughly inspected to ensure those remaining installations have been left safe.

20. Only one of the four lifts serving the hotel was operational at the time of survey but the equipment appears to be intact and there is no reason to believe that significant costs are required to return all lifts to full operational service. Whilst no significant costs are anticipated within the next 5 years, cyclical costs for consumable items such as main hoist rope replacement may fall due on some, or all, of the lifts depending on usage. One of the lifts in the main group was partially disassembled and may require minor repairs or component replacement to return it to service.

21. The pair of lifts serving the car park were isolated at the time of survey but the equipment appears to be intact and there is no reason to believe that significant costs are required to return the lifts to full operational service. The lifts do however have damage to their main traction sheaves and suspension ropes that must be replaced before the lifts can be returned to service.

22. The life safety standby power generator is only showing three hours run time during its 17 years of service. This suggests that service and maintenance has been minimal. The generator must be subjected to a thorough inspection and testing to establish if it is fit for retention.

Compliance

23. There are several deficiencies relating to fire safety at the site, including breaches in fire stopping/compartmentation, defective fire doors and obstructed escape routes. Whilst the risks associated with these issues may be manageable as the building is vacant, these shortcomings must be addressed should the building become occupied, during a temporary/interim arrangement or as part of any refurbishment works.

24. Asbestos containing materials are present at the site. From the survey reports provided to us, the majority of the asbestos is located within seals and gaskets associated with the mechanical and electrical installations. The report identifies a handful of locations where the risk of asbestos exposure is high and the asbestos must be removed prior to accessing these areas. The vendor must confirm the status of the asbestos to these vulnerable locations. All other asbestos containing materials must be removed prior to undertaking and refurbishment or redevelopment works.

25. The Energy Performance Certificate for the Travelodge Hotel remains is valid until June 2023, however it does not represent the current energy use profile of the property. The EPCs for the retail units have expired. Whilst Dominos Pizza remain in occupation, we are not aware which other part of the property provided independent retail space in 2009 when the EPCs were prepared. This may be of limited concern if you plan to redevelop this site in a substantial way but the vendor should provide valid EPCs for all parts of the property to facilitate the transaction.

2.0 Investigations & Surveys Undertaken

West Central Street

Building

1. The properties have been extensively altered to accommodate a 'Zombie Experience' entertainment venue including the removal of general fixtures and fitting, doors and localised new openings formed within the existing structure. The bathrooms and kitchenettes to the upper floor apartments within 35 and 37 New Oxford Road have been retained although heavily damaged or partially removed. In its present state, the building should be regarded as in need of substantial refurbishment.

2. The property has been extensively stripped out and subjected to a fairly widespread destructive opening-up to screen for the presence of asbestos containing materials. As a result, most internal wall finishes, joinery elements, flooring and fittings have been damaged. Permanently repairing this would be a significant task although for the purposes of this report, we have assumed that you would completely refurbish the property if it were retained.

3. Most of the roof coverings to all properties were predominately viewed from vantage points taken from Selkirk House and where safely accessible from 39-41 New Oxford Street. The roof covering appears to vary in age and materials having been replaced throughout its lifetime. The butterfly roofs to the terraced properties require maintenance to the lead flashings and where tiles have slipped or are damaged in localised areas. The cement flaunching to the chimney stack to No. 18 West Central Street has perished resulting in the chimney cowl collapsing onto the main roof above 16b West Central Street. The asphalt flat roof above 16a West Central Street is cracked and deteriorated throughout resulting in damp penetrating the property. The flat roof covering will require replacing in the short to medium term to ensure that the property is watertight. A section of the roof to 16b West Central Street is flooded indicating that the drainage outlets are blocked with debris. Outlets are to be cleared to allow water to discharge from the roof adequately and prevent water ingress internally. The extent of access available to us was very limited and a full roof survey is recommended to ascertain the condition to all roof coverings. At this stage, it would be prudent to allow for replacement of all roof coverings as part of any building refurbishment plans.

4. The windows are generally provided by timber sashes with areas of uPVC secondary glazing installed to the upper floors along the New Oxford Street elevation. Timber decay is evident to the frames and sills allowing water to enter the property whilst it is likely that the sash cords and pulleys will have deteriorated due to a lack of general maintenance. Wholesale replacement of the sash windows is recommended to match the existing due to the properties conservation area location.

5. The upper floors to all of the properties appear to be uneven throughout. This may be as a result of timber decay, or the timber boards/joists have been overloaded. Further investigations are required to ascertain the condition of the joists and whether replacements are required. At this stage, it is reasonable to assume that a significant proportion of the internal floor structures will require replacement or substantial overhaul.

6. There are visible cracks to the decorative corbels and mouldings around doorways and window surrounds to 10-12 Museum Street. Vegetation growth is also evident to the cornice mouldings and parapet walls and will require urgent repairs to prevent further deterioration and collapse resulting in serious harm to pedestrians below. The render is loose in areas ranging in severity with the worse areas exposing steel reinforcement beneath. Corroded reinforcement should be treated with an anti-corrosion inhibitor followed by blown and cracked render being hacked off and reapplied. Once the façade is accessed by scaffold, it is likely that most of the existing render will be found to be loose or compromised and complete replacement may be required.

7. Due to the age of the property, it is possible that deleterious content may be present within the lath walls and ceilings. Typically, horse and animal hair plaster are applied to wooden laths directly which can contain bacteria such as Anthrax if the hairs have not been disinfected. Samples should be taken to confirm whether hairs are present within the plaster and Anthrax testing undertaken.

Services

8. The mechanical services plant and equipment previously serving the properties is currently non-operational and largely deemed redundant. As a minimum, temporary heating for fabric protection should be considered in the short term.

9. Despite the properties being unoccupied, routine testing and maintenance should be carried on lighting, emergency lighting, and fire detection and alarm installations to ensure a base level of safety and protection is afforded at all times. Large areas have been left without lighting (including areas which do not benefit from any natural daylight) while fire detection and alarm systems are isolated or present with faults and disablements. These installations must be inspected and tested immediately to identify and action all required repairs.

10. The part strip out and removal of mechanical and electrical plant and equipment appears to have been undertaken in an uncontrolled, and possibly unauthorised, manner. The properties should be thoroughly inspected to ensure those remaining installations have been left safe.

Compliance

11. Our inspection identified numerous compartmentation and fire stopping deficiencies around service risers and between floors where plasterboard ceilings have been damaged. The fire strategy for the building needs to be established during the design stage and all breaches rectified during any refurbishment works.

12. An asbestos demolition survey report for 35-41 New Oxford Street and 10-12 Museum Street produced by Environmental Essentials dated October 2020 confirms the presence of asbestos. The majority of the asbestos appears to be in floor tiles and textured coatings to ceilings. Asbestos removal is likely to be required as part of any future refurbishment works. Contingency allowance for further asbestos removal must be factored into any refurbishment cost plan for these buildings.

3.0 Selkirk House

3.0 Selkirk House

The scope of the pre-redevelopment audit for Selkirk House (the site of the proposed Vine Lane, High Holborn, and One Museum St buildings) is largely addressed in the Retention and Redevelopment Options Appraisal dated June 2023 submitted with the application (see Chapter 4.0). Therefore, a high level summary is included within this document.

3.0 Selkirk House

Selkirk House

Key Information

Address:	Selkirk House & 166 High Holborn	
Building Age	1960s	
Key Materials	Original facade of concrete panels overclad with aluminium insulated panels. Internally, the concrete structure is exposed to the car-park levels with plasterboard partitions to hotel levels.	
Building Services	The building surveys outlined in section 2.0 identify that the existing servicing, dating from c.2005 when the building was converted have been partially removed and those that remain are understood to be beyond their economic life. See 'servicing' section of survey conclusions in chapter 2.0 for further details.	
Last known use	Car Park	*In Use*
	Hotel – Class C1	*Vacant from late 2020*
	Serviced Apartments	*Vacant from late 2020*
	Commercial – Class A3	*In use as fast-food takeaway*
Energy performance	Retail Units: D-E	
	Hotel: D	
Photos of internal and external	Refer to DAS & Selkirk House Retention Options Review & WLC Comparison	
Site plan	Refer to planning application drawings	

For further information, please refer to this application's planning documentation, including the DAS, which has formed the information presented within this document.

Existing Site Plan (highlighting Selkirk House)

4.0 West Central Street Buildings

4.0 West Central Street Buildings

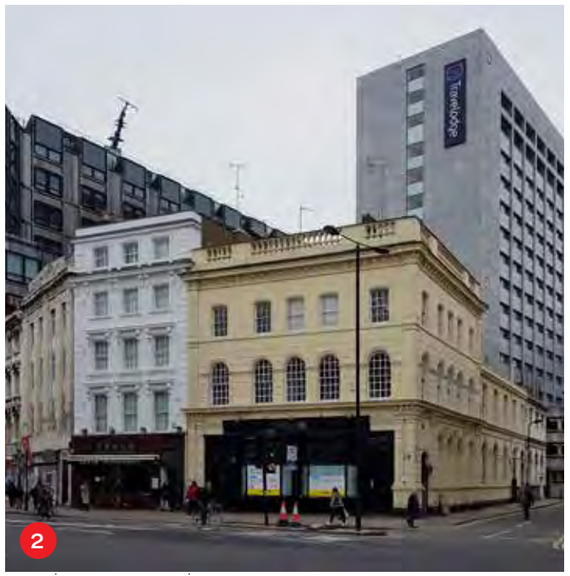
Site Overview

The following section brings together content and analysis from the planning application, most notable the Heritage Statement which should be referred to for further detail.

West Central Street:
Photographic Overview

These images provide a walk aro*appraisal, please refer*
Street urban block. As shown in more detail, the block is comprised of a number of different freeholds each varied in height and architectural appearance and significance.

For comprehensive existing fabric appraisl, please refer to the associated Townscape, Visual Impact and Heritage Report prepared by The Townscape Consultancy.



Nos. 33 | Nos. 35 & 37 | Nos. 39 & 41 | No 43 | No 45 | Nos. 16a

New Oxford Street | West Central Street

Site Ownership

Key Plan

No. 16a | No. 18 - 16b | Nos. 10-12

West Central Street | Museum Street

Site Ownership

4.0 West Central Street Buildings

Listing Plan

Key:

- Site Boundary
- Grade 2 Listed
- COIL Granted

4.0 West Central Street Buildings

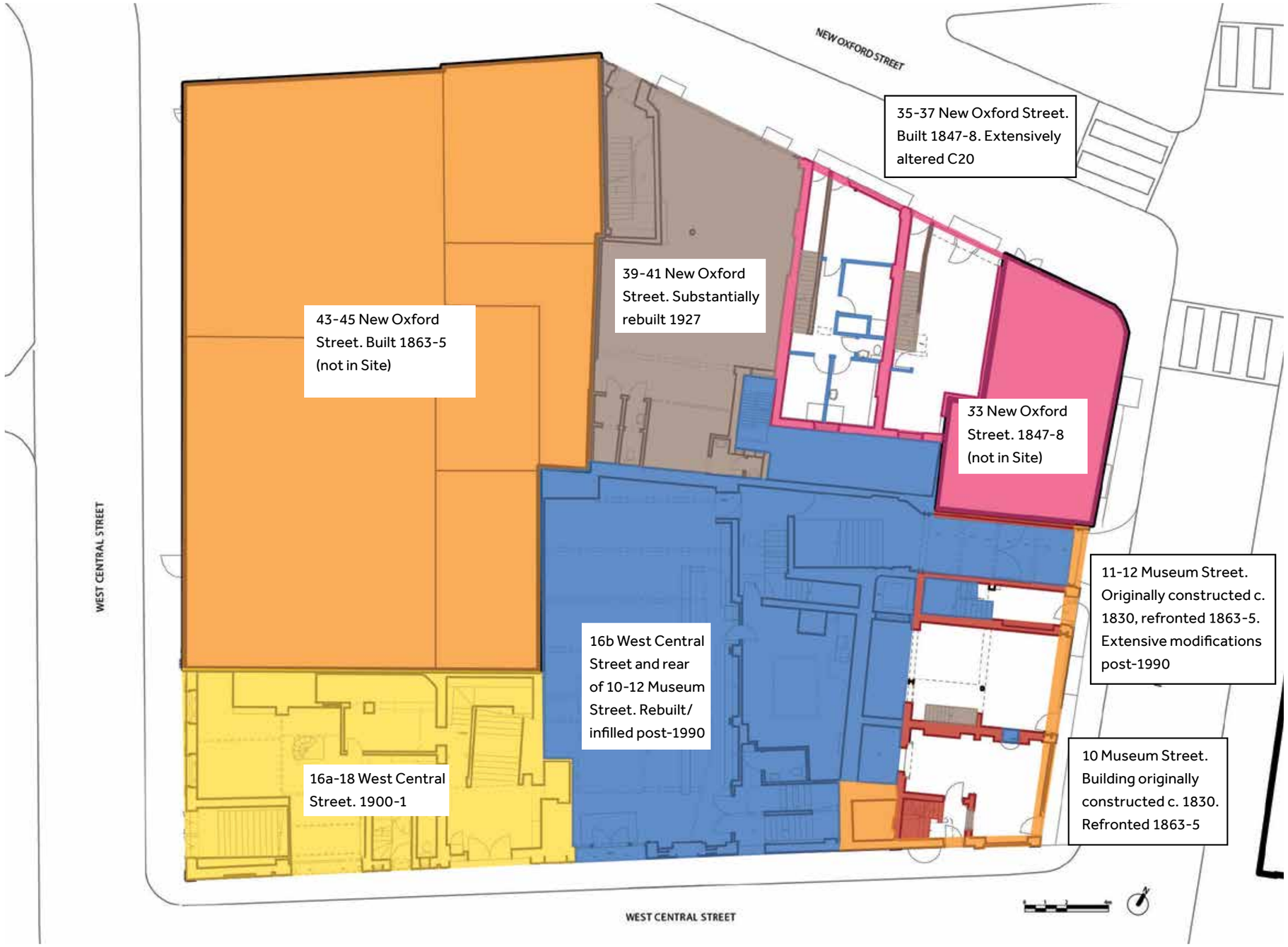
Historic Development Plan

Date key

- c. 1830
- 1847-8
- 1863-5
- 1900-1
- C20
- Post-1990

Note on 10 Museum Street's closet wing

Our research suggests that the closet wing was replaced around 1863-5, following the demolition of the smithy also located at the rear of no. 10.



4.0 West Central Street Buildings

10-12 Museum Street

Key Information

Address:	10-12 Museum Street
Building Age	Constructed c.1830, Refronted 1863-5
Key Materials	- Riveted iron supporting 1863-5 stucco façade - Original brick coal vaults - Lath and plaster walls & ceilings identified in 10 Museum St - Plasterboard partitions throughout - Late C20 floor surfaces - Flat C20 roof covered in asphalt with C20 roof - Mouldings and joinery throughout although more prevalent in 10 Museum St
Building Services	The detailed building surveys undertaken found that building services across West Central Street have been partially removed and those that remain are understood to be beyond their economic life. See 'servicing' section of survey conclusions in chapter 2.0 for details.
Last known use	A1/A2 Retail/Professional Services; Residential
When Vacant From	Part of the ground floor of this block formed part of the former nightclub. It is understood to have been substantially vacant since 2012. In 2020 it formed part of the immersive Zombie Experience. The upper floors of 11-12 were last in lawful use as residential in 2020.
Energy performance	A1/A2 Retail/ Professional Services: D Residential: B-E
Photos of internal and external	Included as part of document
Site plan	Refer to planning application

For further information, please refer to this application's planning documentation, including the DAS, which has formed the information presented within this document.

Existing Site Plan (highlighting 10-12 Museum Street)

4.0 West Central Street Buildings

10-12 Museum Street

Existing External Condition

Extensive surveys of the existing buildings have been carried out as outlined in section 2.0 and have informed the planning and listed building submission. These identified that the buildings are in a poor state of repair. Following facade testing the building facades were netted in Spring 2023 to prevent loose materials from falling on the adjacent footway.

The facades date from 1863-5, when 10-12 Museum Street were refronted in stucco.

Alteration and replacement of the shop fronts alongside years of neglect have resulted in a building frontage of poor condition.

The existing windows incorporate poor quality secondary glazing which is detrimental to the appearance of the buildings. While the facade is in poor condition, many of the original decorative features appear intact.

The historic carriageway entrance to the internal yard is still legible however is currently closed off by an unsightly metal shutter.

West Central Street and Museum Street Elevations

Museum St Elevation Detail

Courtyard Elevation

Museum St Elevation

West Central Street and Courtyard Elevations

10 Museum Street

Existing Internal Condition

10 Museum Street Basement:

Closet wing into modern extension

Front vaults and coal hole

Modern joist supporting opening to front and back of basement. Boarded up fireplace possibly concealing range. Concrete screed.

Historic sash window in need of repair

10 Museum Street Ground Floor:

c. 1830s Staircase, Twisted mahogany handrail and stick balusters.

Cornice, Skirting & architrave all of early phases
Arch with c1860s details joining front and back rooms.

Partially infilled fireplace opening. Cornice and architraves of early phases.

Looking towards boarded up shopfront. Iron structure supporting 1860s facades.

4.0 West Central Street Buildings

10 Museum Street

Existing Internal Condition

10 Museum Street First Floor:

Infilled fireplace with pre-war common bricks - evidence of c1930s phase. Cupboard with modern joinery

10 Museum Street Second Floor:

c1860 fireplace behind boarding

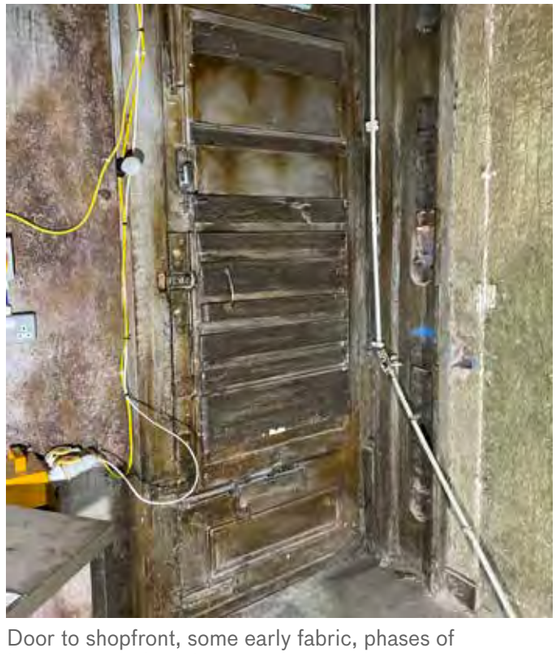
Historic fabric covered with damaging paintwork. Historic fire surround and side cupboards.

10 Museum Street Third Floor:

Historic fireplace including decorative arched cast-iron register grate, some joinery, lath and plaster and floorboards.

Cast-iron cooking range in front room with one surviving fitted cupboard to side

11 Museum Street Ground Floor:



Door to shopfront, some early fabric, phases of ironmongery alteration.

Area rebuilt in 1990s, new joinery.

4.0 West Central Street Buildings

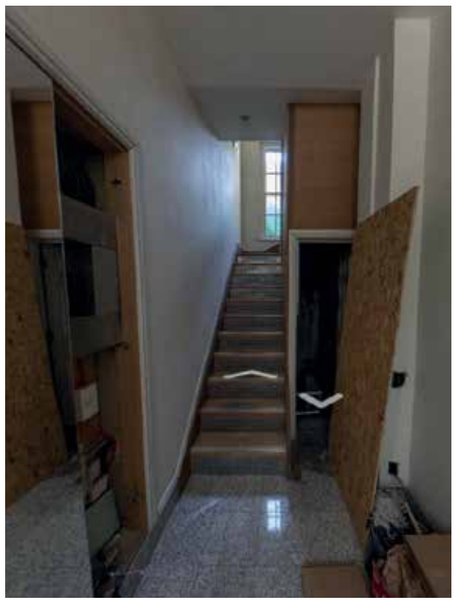
11-12 Museum Street

Existing Internal Condition

Coal vault corridor connecting 11 and 12

Front room. Note modern uPVC window

Ground floor of no. 11



Ground floor of no. 12. Fitted mirror and stair treads, panels, and risers excluded from listing

Coal vault in 11. Note tank

Opening to no. 10

Ground floor of no. 11

4.0 West Central Street Buildings

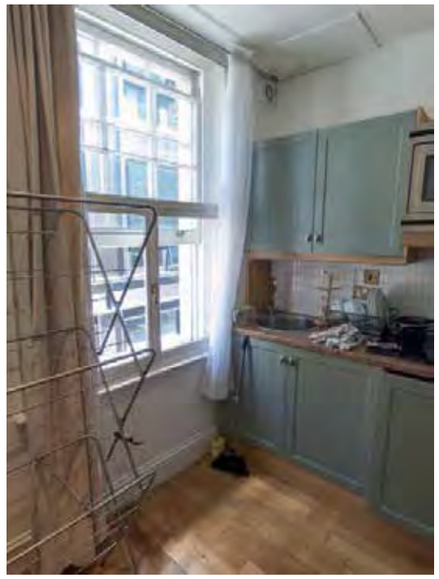
11-12 Museum Street

Existing Internal Condition

Rear studio flat to no. 11

Studio flat to no. 12

View to front studio flat of no.11 from stair landing



Studio flat to no. 12

Rear studio flat to no. 11

Front studio flat to no. 11

Studio flat to no. 12

Rear studio flat to no. 11

Studio flat to no. 12

Studio flat to no. 12

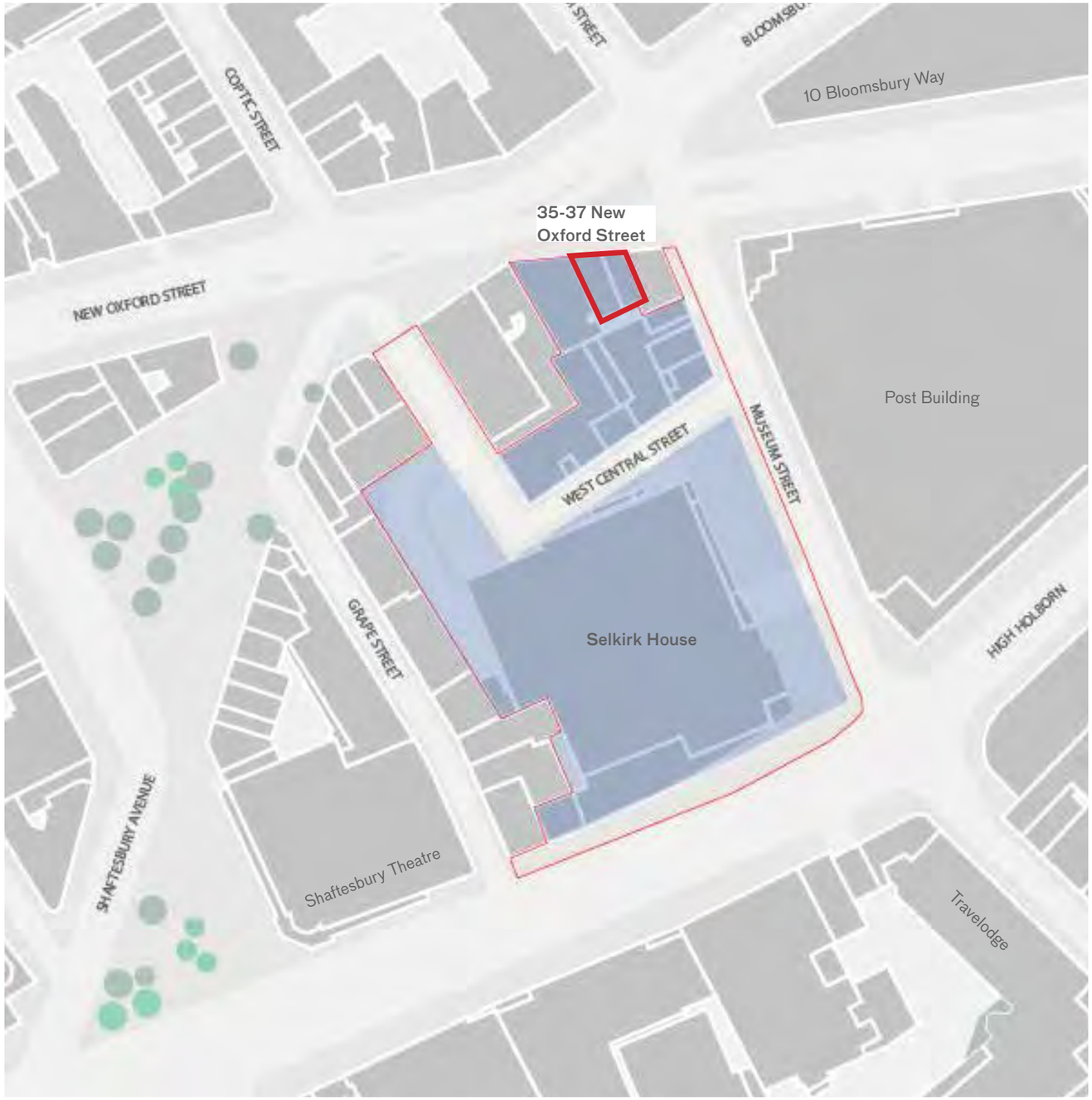
4.0 West Central Street Buildings

35-37 New Oxford Street

Key Information

Address:	35-37 New Oxford Street	
Building Age	Constructed c.1847-48, extensively altered C20	
Key Materials	- Stucco façade - Original brick coal vaults - Some lath and plaster walls & ceilings identified in 35 New Oxford St - Plasterboard partitions throughout - Modern floor finish. Existing floorboards tbc. - Butterfly roof: slate-covered with red clay ridge tiles - Mouldings and joinery throughout although more prevalent in 35 New Oxford St	
Building Services	The detailed building surveys undertaken found that building services across West Central Street have been partially removed and those that remain are understood to be beyond their economic life. See 'servicing' section of survey conclusions in chapter 2.0 for details.	
Last known use	A1/A2 Retail/ Professional Services, Residential	
When vacant from	January 2020	
Energy performance	A1/A2 Retail/ Professional Services Residential	E C-F
Photos of internal and external	Included as part of document	
Site plan	Refer to planning application	

For further information, please refer to this application's planning documentation, including the DAS, which has formed the information presented within this document.



Existing Site Plan (highlighting 35-37 New Oxford Street)

4.0 West Central Street Buildings

35-37 New Oxford Street

Existing External Condition

Extensive surveys of the existing buildings have been carried out as outlined in section 2.0 and have informed the planning and listed building submission. These identified that the buildings are in a poor state of repair. Following facade testing the building facades were netted in Spring 2023 to prevent loose materials from falling on the adjacent footway.

While the majority of the existing facade of 35-37 New Oxford Street is intact, it is in poor condition.

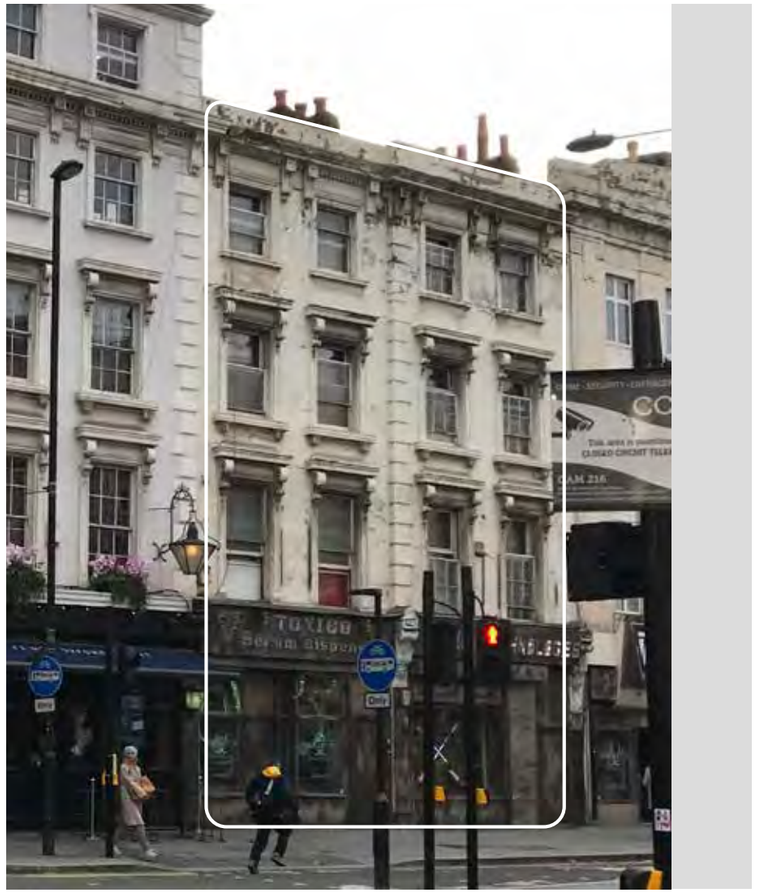
Alteration and replacement of the shop fronts is evident. To upper floors, the facade follows classical vertical hierarchies and is adorned with decorative cast ornament typical of the mid-nineteenth century. This is of poor condition and requires localised repair and repainting as identified in the aforementioned building surveys.

While the windows are large and offer good access to daylight/sunlight and views out, they are in poor condition and do not comply with modern thermal or acoustic requirements; especially given their location on New Oxford Street, a busy thoroughfare. It is evident that secondary glazing has been installed more recently however this is also of poor condition and undermines the elegance of the traditional sash windows.

It is apparent that the windows in 35 New Oxford Street are not the original as they are not comprised of the typical regency multi-paned glass arrangement; instead have the appearance of larger, single pane cylinder plate glass reflective of the Victorian Era.

Further evidence of alteration to the facade is present through the bright white painted appearance of the facade's stucco as opposed to the appearance of scored stone coloured paintwork on 10-12 Museum Street.

Please refer to the heritage statement and listed building application submitted alongside this application for further analysis of these buildings.



New Oxford Street Elevation

Courtyard Elevation

Courtyard Elevation

Courtyard Elevation

4.0 West Central Street Buildings

35-37 New Oxford Street

Existing Internal Condition

35 New Oxford Street Ground Floor:

Mix of modern and historic joinery. Walls painted to appear abandoned. *(35 NOSt.)*

35-37 New Oxford Street First Floor:

Historic skirting and picture rail. Doorcase with later modifications. Modern kitchenette. *(35 NOSt.)*

One of the few rooms with cornice across 35 and 37 New Oxford Street. *(35 NOSt.)*

Modernised and substantively rebuilt staircase. *(37 NOSt.)*

Modern balustrading, treads, risers and stringers cladding. *(35 NOSt.)*

4.0 West Central Street Buildings

35-37 New Oxford Street

Existing Internal Condition

35-37 New Oxford Street Second Floor:

En-suite enclosure, changing historic plan. *(35 NOSt.)*

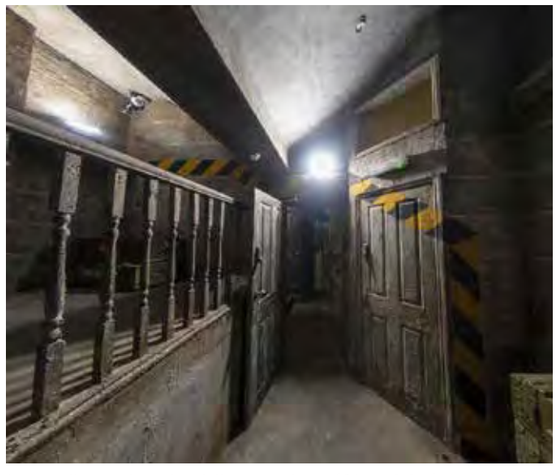
Fireplace to front room: one of the few remaining historic features within 35 and 37 New Oxford Street *(35 NOSt.)*

Modern joinery to 37 New Oxford Street.

35 -37 New Oxford Street Third Floor:

Mix of modern and historic joinery. *(35 NOSt.)*

Modern joinery and lost fireplace. *(35 NOSt.)*



Butterfly roof to third floor ceiling *(37 NOSt.)*

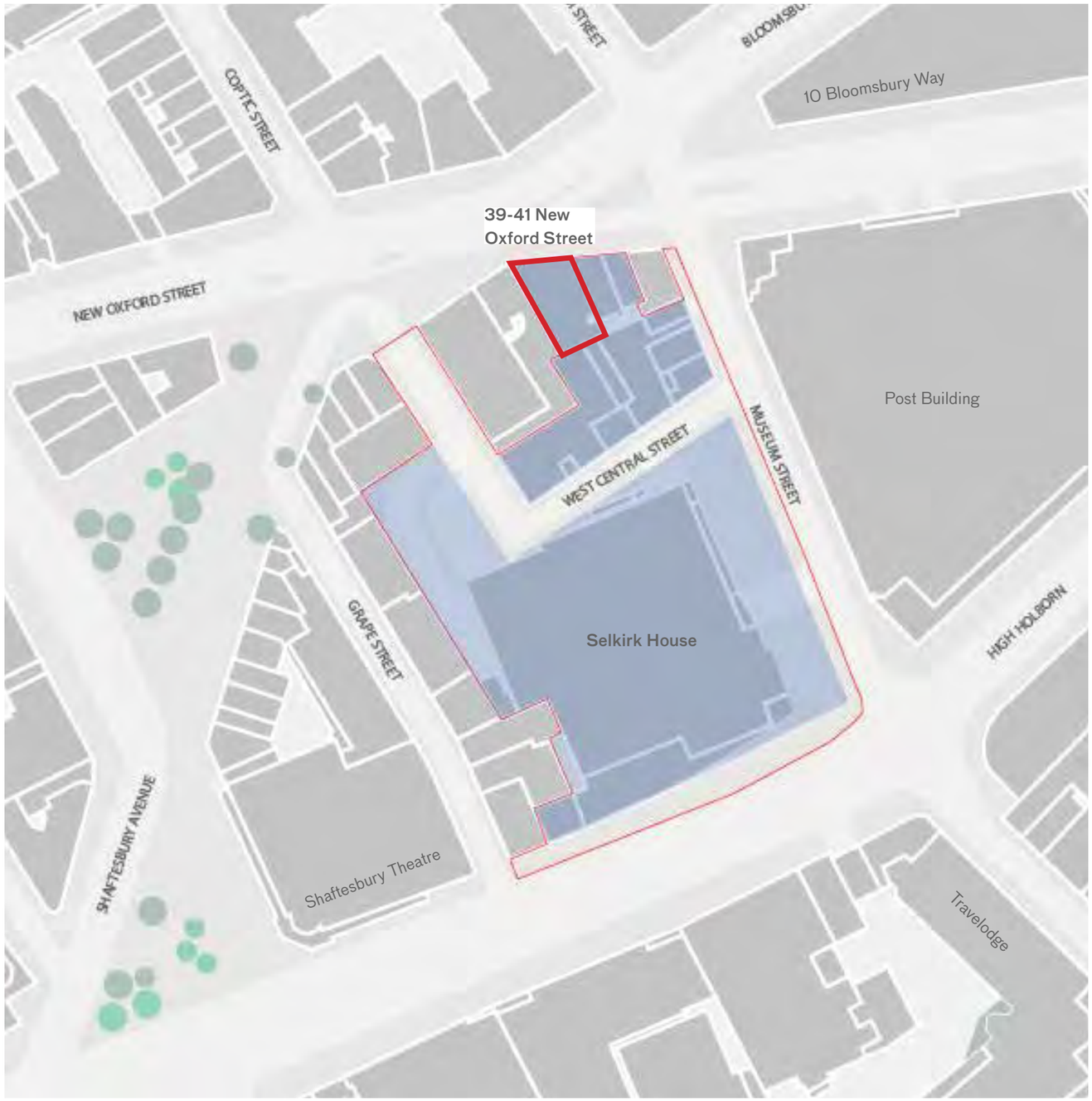
4.0 West Central Street Buildings

39-41 New Oxford Street

Key Information

Address:	39-41 New Oxford Street	
Building Age	Substantially rebuilt 1927	
Key Materials	Yellow stock brick with a rendered front elevation; the roof appears to be covered with slate.	
Building Services	The detailed building surveys undertaken found that building services across West Central Street have been partially removed and those that remain are understood to be beyond their economic life. See 'servicing' section of survey conclusions in chapter 2.0 for details.	
Last known use	A1/A2 Retail/Professional Services;	
When vacant from	January 2020	
Energy performance	A1/A2 Retail/ Professional Services	E
Photos of internal and external	Included as part of document	
Site plan	Refer to planning application	

For further information, please refer to this application's planning documentation, including the DAS, which has formed the information presented within this document.



Existing Site Plan (highlighting 39-41 New Oxford Street)

4.0 West Central Street Buildings

39-41 New Oxford Street

Existing External Condition

Extensive surveys of the existing buildings have been carried out as outlined in section 2.0 and have informed the planning and listed building submission. These identified that the buildings are in a poor state of repair.

Similarly to 35-37 New Oxford Street, much of the existing fabric 39-41 New Oxford Street is intact, but in poor condition. While the architectural language of the facade is clearly of the 1920's art deco deco the horizontal proportions and vertical hierarchies reflect that of the classical period and therefore feel contextual beside 35-37 New Oxford Street and 43 New Oxford Street.

There is a characterful extruded signage zone above the shop fronts. While this breaks the rhythm of shop fronts to the New Oxford Street Elevations as a whole, provides a feature which enhances the individual identity of 39-41 New Oxford Street.

The ground floor shop front is in poor condition and requires replacement to modern thermal standards. The existing front door retains its characterful art deco surrounding however the current door is in poor condition and is an eyesore to the historic fabric.

On upper floors while the main body of the facade and ornament is in good condition, it requires repainting. The current windows however are poor quality PVC windows in poor condition and their appearance do not resemble the more filligree multi-paned aluminium style window which would be expected of this period of architecture. The aperture sizes and locations relative to finished floor levels are well suited to create a good level of daylight/sunlight and aspect expected for residential accommodation. The building is topped by the characterful pitched pediment which is in a state of disrepair.

Existing Shopfront

Existing Paintwork

Existing Facade Overview

Existing Windows

4.0 West Central Street Buildings

16a-18 West Central Street

Key Information

Address:	16a-18 West Central Street
Building Age	16a-18 WCSt: Constructed 1900-1 16b WCS: Constructed post 1990
Key Materials	London stock-brick faced in stucco to the street-facing elevations with slate and asphalt roof coverings and clay chimney pots.
Building Services	Previous use as a nightclub ceased in 2012 and services have been partially removed as identified in section 2.0. Remaining servicing in connection with the previous use is considered beyond its economic life.
Last known use	B1 Offices D2 General Assembly and leisure
When vacant from	Last used as a nightclub in 2012. Used as part of the Zombie experience in 2020.
Energy performance	D2 General Assembly and leisure E
Photos of internal and external	Included as part of document
Site plan	Refer to planning application

For further information, please refer to this application's planning documentation, including the DAS, which has formed the information presented within this document.

Existing Site Plan (highlighting 16a-18 West Central Street)

16a-18 West Central Street

Existing External Condition

Extensive surveys of the existing buildings have been carried out as outlined in section 2.0 and have informed the planning and listed building submission. These identified that the buildings are in a poor state of repair. Following facade testing in Spring 2023 to prevent loose materials from falling on the adjacent footway.

As shown in the photographs adjacent, the facades to 16A and 18 West Central Street are in poor condition and have been repainted in bold colours.

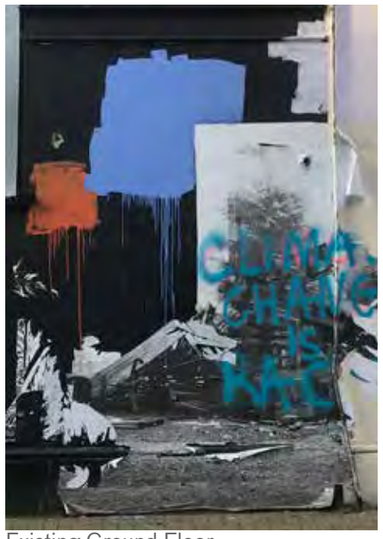
There are limited openings at ground floor and windows to the upper floors have high cills. This not only creates poor connectivity to the street, but would provide poor outlook from residential accommodation if refurbished.

16B West Central Street is the single storey infill to the middle of West Central Street. 18 West Central Street has a deep floor plan and large mezzanine arrangement.

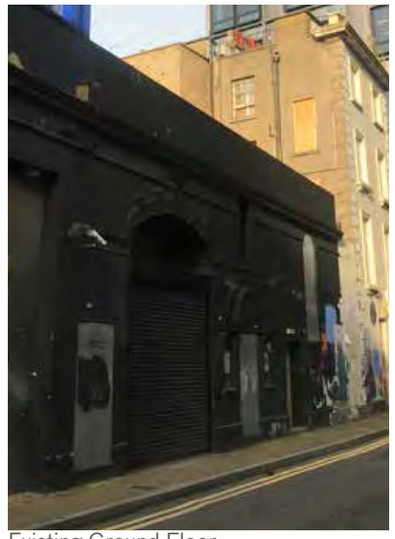
The existing facade has limited active frontage and similarly to 16A and 16B West Central Street has no overriding consistent rhythm and the architectural language appears to be informed by the adjacent buildings.

16A-18 West Central Street is explored in further detail in Part 2 of this document.

Existing Facade Condition as seen from Museum Street



Existing Ground Floor



Existing Ground Floor

Existing Facade Condition as seen from West Central Street

Existing wall crane

Existing Facade Condition

4.0 West Central Street Buildings

16a-18 West Central Street

Existing Internal Condition:

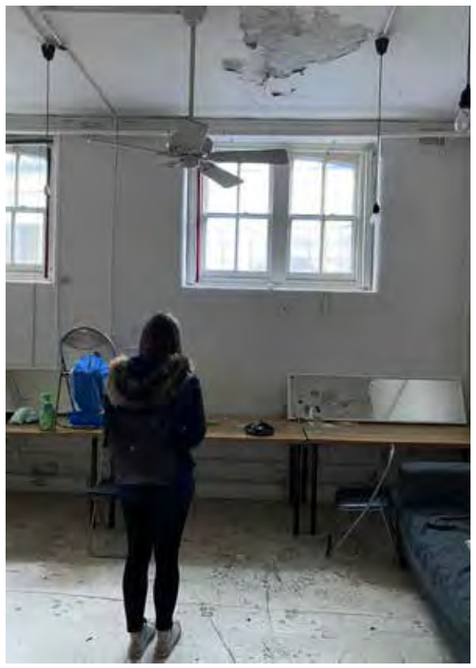
Existing Stalls

Horse and barrel ramp

Existing cast iron staircase

Vaulted basement

Existing floor Setts



Existing Windows (above eye level)

Existing winch mechanism

Existing ground floor condition 16A-18 West Central Street

4.0 West Central Street Buildings

Internal Conditions:

The internal conditions of wall, floor and ceiling finishes is poor to very poor. There are signs of damp and mould in many of the buildings.

The existing vertical circulation is of poor quality and largely non-compliant to fire and accessibility requirements.

There has been a number of internal changes to the configuration of spaces over the years which have resulted in incoherent layouts that are difficult to navigate and have limited legibility to the original freeholds.

There is no evidence of upgrade to the existing structural elements and so the current facades, floors and party walls do not meet current standards in the relevant approved documents or London Housing quality criteria.

The existing residential accommodation do not meet minimum areas requirements to comply with building regulations and London Plan minimum space standards.

Ongoing Management and Maintenance

The buildings are being managed by the applicant. A number of urgent works were undertaken in 2022/23 to the buildings to address issues identified. These included remediation to and netting of facades.

The buildings were squatted for a period of several weeks in winter 2023. Following this entrances have been secured to prevent future squatting.

5.0 Conclusion

5.0 Conclusion

Summary

Extensive work was undertaken to understand the condition of the existing buildings in West Central Street and Selkirk House. Detailed heritage assessments have also been undertaken for the West Central Street buildings to inform design development and the planning and listing building submission.

Aside from the operational car park and fast-food takeaway, the buildings have been vacant for a number of years and present in poor condition as outlined in the detailed building surveys in section 2.0 and section 4. Building services have largely been removed or destroyed, and where present are beyond feasible repair due to their age and condition.

The following section brings together the assessment of options that was carried out, both from a planning policy and technical point of view. This assessment was carried out with the benefit of the detailed understanding of the site and its buildings. This knowledge has further informed the resulting proposals, and especially the approach to retention and refurbishment across the site.

To the extent that demolition is proposed, the updated pre-demolition audit has been submitted alongside this document.

DSDHA

Part 2

Clarifications and Responses on Demolition Justification and Retention options appraisal

DRAFT ONLY

1.0 Introduction

1.0 Introduction

This section of the document responds to those comments raised by LB Camden officers and the GLA around the options explored for retention and justification for the extent of demolition where demolition is proposed. The proposals have been informed by a full understanding of the buildings set out in the application and elaborated for context in Part 1.

This section seeks to bring together work that is included in the application documents and further elaborates with work that informed the narrowing of options that led to the selected proposals. It draws upon and should be read in conjunction with the following documents:

- Planning Statement
- Hotel Needs Assessment
- The Design and Access Statement (DAS) Section 7.0
- Heritage statement
- Retention and Redevelopment Options Appraisal and Whole Life Carbon comparison
- Circular Economy Statement
- Pre-redevelopment and Pre-demolition Audit (updated September 2023)

As officers are aware, the application proposes to retain and refurbish a number of the existing buildings, namely: 10-12 Museum Street (listed grade II) 35-37 New Oxford Street (listed grade II) and 39-41 New Oxford Street. The application proposes substantial demolition of two of the existing buildings: Selkirk House and 16a-18 West Central Street. For these buildings, substructure and elements of basement are retained and adapted for re-use in the proposals, as these have been identified as suitable for the proposed use of the site.

From the surveys of the buildings, it is clear that many elements cannot be retained or reused as they are beyond economic repair and / or safe repurposing. The MEP Services across the site fall into this category along with the façade of Selkirk House alongside significant portions of its structure, this is set out elsewhere in the planning application documents and in Part 1 of this document.

The planning policy review and analysis of the buildings sets out below how the site was assessed for different uses in order to meet the planning policy requirements. This is set out in section 2.0.

Significant work was carried out to assess in detail options that may meet these requirements, notably set out in the comprehensive Retention and Redevelopment Options Appraisal and the DAS. Where this work was summarised in the application it has been set out in greater detail at section 3.0.

Section 4.0 also brings these strands of work together to set out the extent of and justification for demolishing those elements that are being demolished.

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2.0 Planning Policy Context

2.0 Planning Policy Context

The full planning policy context and case to support the partial retention, demolition and new development overall is set out within the submitted Planning Statement.

In seeking to elaborate on the planning policy considerations in relation to the options explored for retention and provide justification for the extent of demolition where demolition is proposed, it is necessary to consider:

- Camden Policy CC1, which requires all proposals for substantial demolition to demonstrate that it is not possible to retain the existing building.
- Camden Policy CC2, which requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures.
- Camden Policy CC4, which seeks to ensure that the impact of development on air quality is mitigated and exposure to poor air quality is reduced in the borough.
- Camden Policy H1, which sets out that the council will secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing
- Camden Policy H2, which seeks to deliver a mix of uses through the delivery of 50% of all additional floorspace as self-contained housing, subject to viability.
- Camden Policy H4, which sets out that the council will maximise the supply of affordable housing.
- Camen Policy D2, which requires any proposal to preserve and enhance the historic environment and heritage assets, including Conservation Areas and Listed Buildings.
- The Camden Energy and Efficiency CPG, which requires the applicant to assess the opportunities for retention and refurbishment through an assessment of the condition of the existing building and future potential of the site.

- London Plan Policy D3, which sets out the hierarchy for building approaches which maximises the retention of existing buildings through refurbishment and re-use over the least preferable option of recycling materials produced by the demolition process.
- London Plan Policy D3, which notes that all development must make the best use of land by following a design-led approach that optimises the capacity of sites.
- London Plan Policy SI 7m which focuses on reducing waste and supporting the circular economy.
- London Plan Policy SD4, which places emphasis and focus on commercial development within the Central Activities Zone (CAZ), including offices in order to meet the local and strategic need for new office space in central London.
- London Plan Policy GG4, which identifies an underlying principle to encourage additional housing at appropriate locations and to reuse brownfield sites to deliver homes.

- Camden Adopted Site Allocations Plan (2013) Site 18, which supports the comprehensive redevelopment of the site with a mix of commercial and residential uses.
- Camden Draft Site Allocations Plan (2020) Policy HCG3, which also supports the comprehensive redevelopment of the site with a mix of commercial and residential uses.
- Camden Holborn Vision and Urban Strategy (2018), which specifically encourages the redevelopment of the site in order to deliver the public realm improvements which form part of the vision and objectives for the local area.
- The NPPF (2021), which seeks to significantly boost the supply of housing. The NPPF is clear in stating that more effective use of land should be taken where sites are well located to good transport links and where there is an existing or anticipated shortage of land for meeting identified housing needs.

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3.0 Options Considered for Land Use

3.0 Options Considered for Land Use

The first consideration for potential uses for the site was the requirement to meet planning policies in relation to the site, including optimisation of land and key land use objectives as set out in the development plan designations and objectives for the site.

The site is located within the defined Central London Area and the Central Activities Zone (CAZ), where planning policy places emphasis and focus on commercial development, including offices in order to meet the local and strategic need for new office space in central London. Commercial development and office development is most appropriate in the CAZ and is less appropriate outside the CAZ. This means that sites in the CAZ need to be optimised for commercial and office uses if need is to be met. This means that the potential of CAZ sites for commercial and office uses must be considered as a priority over and above land uses and these commercial and office used uses must be optimised in such locations if the best use of land is to be achieved as per Policy D3.

Policy HG3 requires the site to provide for *'mixed-use development including hotel, self-contained homes, offices and retail'.* The application proposals currently include all of these key land use except for an hotel.
It was not considered appropriate to test other land uses for the purposes of hypothetical land use scenarios as this would be stepping outside the clear objectives of the site specific policy allocation in relation to land use and mixed use.

The Car Park

The existing multi-storey car park is an inappropriate use in such a highly accessible PTAL 6, Zone 1, CAZ location, its retention being prejudicial to the achievement of numerous sustainable travel, environmental, air quality and net zero objectives. It's retention would also prevent the delivery of other priority land uses. It cannot be retained and converted into alternative land uses. Its central location sterilises the site and prejudices the optimisation of the sites potential in accordance with planning policy objectives seeking to optimise development capacity and make the best use of land.

Hotel Use

The scheme is not needed for hotel use as set out in the Hotel needs assessment. The existing former hotel on site is vacant and redundant. It was of moderate to poor quality and the constraints of the structure limit opportunity to improve this. The scheme is thus unable to provide hotel in the existing building and it has been demonstrated to be a non-viable use for the site.

Disposition of Land Uses Around the Site

In delivering the policy required mix of uses, the existing uses and suitability of the different buildings was considered. Relevant policy considerations in delivering high quality residential include:

- Air quality
- Maximum number of units per core
- Single aspect units
- Ability to provide openable windows
- Amenity space

It is a key policy requirement to provide housing and affordable housing, but importantly to ensure that the new residential elements are located in the parts of the site best suited to it. The constraints listed above are thus specifically pertinent to the achievement of the key land use objective to provide housing and affordable housing of good quality as well as to the key planning policy objective to make the best and most efficient use of land.

The best air quality on the site is away from the major roads in the centre of the site on West Central Street and the proposed Vine Lane. Maximising residential where it can provide openable windows and better air quality, predominantly south facing and double aspect units and access to a communal courtyard amenity space were considered to be significant factors in locating uses to maximise residential quality.

The existing Selkirk House would provide only single aspect units and therefore larger than two bed would be precluded by GLA guidance. This would also present a challenge producing fewer than 8 units per core without creating large single aspect units. Structural constraints set out elsewhere would also impact residential resulting in low ceiling heights, especially if mechanical ventilation were required.

The options considered for detailed appraisal based on the above analysis were for residential and affordable housing on West Central Street and for offices at Selkirk House

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4.0 Existing Building Appraisal and Confirmation of Justification for Demolition

4.0 Existing Building Appraisal and Confirmation of Justification for Demolition

Through extensive surveys of the building, we have understood the limitations of the existing buildings on the site. These issues are considered in detail in the application, specifically the DAS and Retention and Redevelopment Options Review, we have tried to minimise repeating them here but have brought elements together here and elaborated to ease review.

10-12 Museum Street & 35-41 New Oxford Street

These buildings are proposed to be retained and refurbished.

16-18a West Central Street

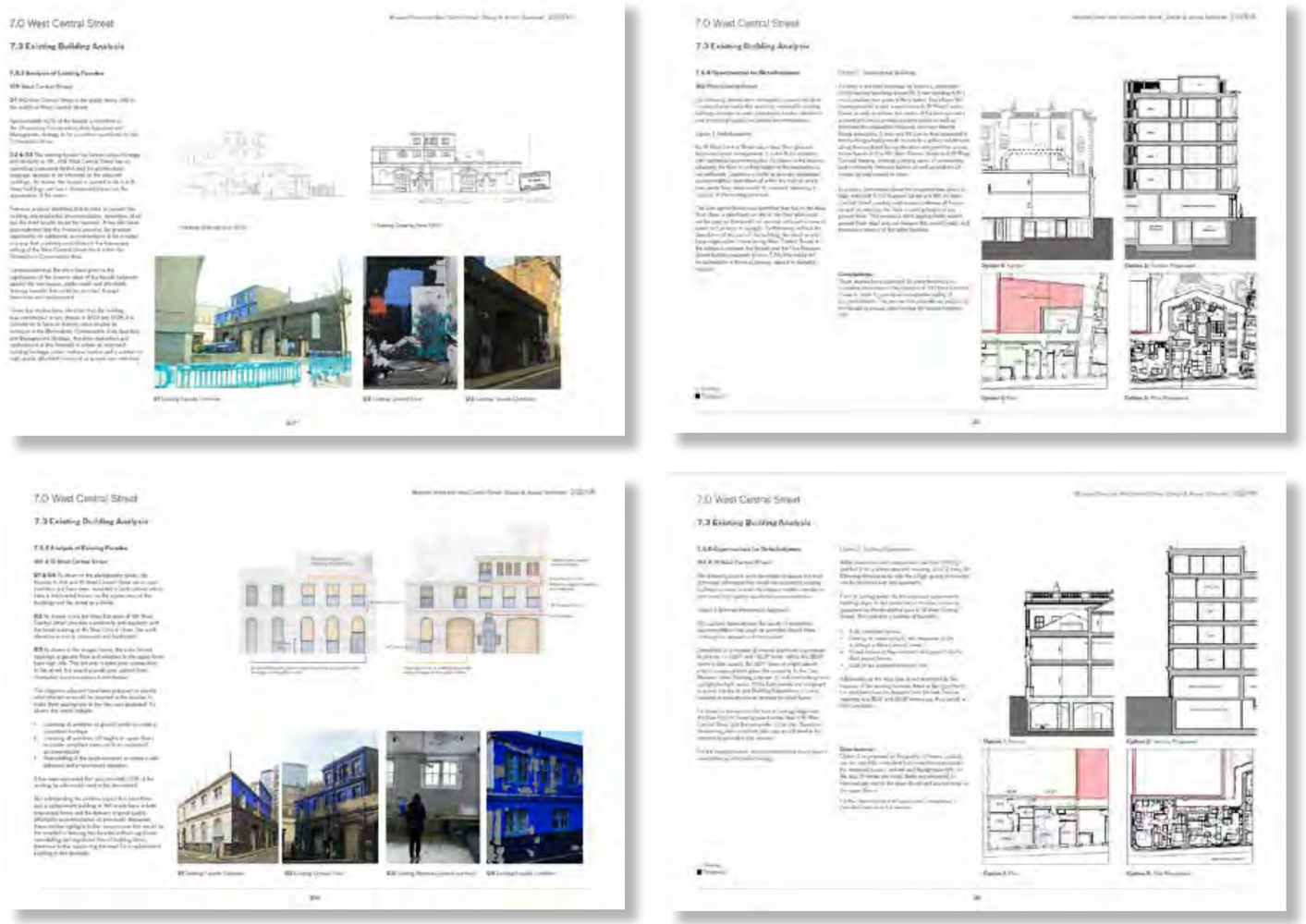
The buildings were originally constructed as a stables and yards and have been altered to be used as warehouse and nightclub uses. Some of the building is a modern single storey extension. Overall, the buildings are in a very poor state of repair being detrimentally impacted by a number of issues and constraints effecting their retention, reuse and utility including:

1. High level windows on ground floor prevents active frontage at ground level.
2. Window to mezzanine breaks rhythm of facade and is blocked up.
3. High level windows not consistent with neighbouring plots (16 WCS/ 45 NOS).
4. High level windows do not allow for private amenity provision required by SPG.
5. Windows currently 1450mm above floor level. Part M requires windows to be max. 750mm above floor finish.
6. Internal ramp and configuration

These constraints both individually and cumulatively are significantly prejudicial to the ability to retain these buildings for residential use.

Through the options testing, it has been identified that significant alteration to the building and existing facade would be required. The resulting scheme would retain only modest elements of the fabric and the residential delivered would be of poor quality. In addition the constraints imposed produce inefficient design and severely limit the amount of residential the scheme could deliver.

An analysis is provided on the impact of retaining 16a-18 WCS on the scheme, through a series of exercises that have been carried out exploring different extents of retention of the existing buildings 16a, 16b and 18 – the former End nightclub site.



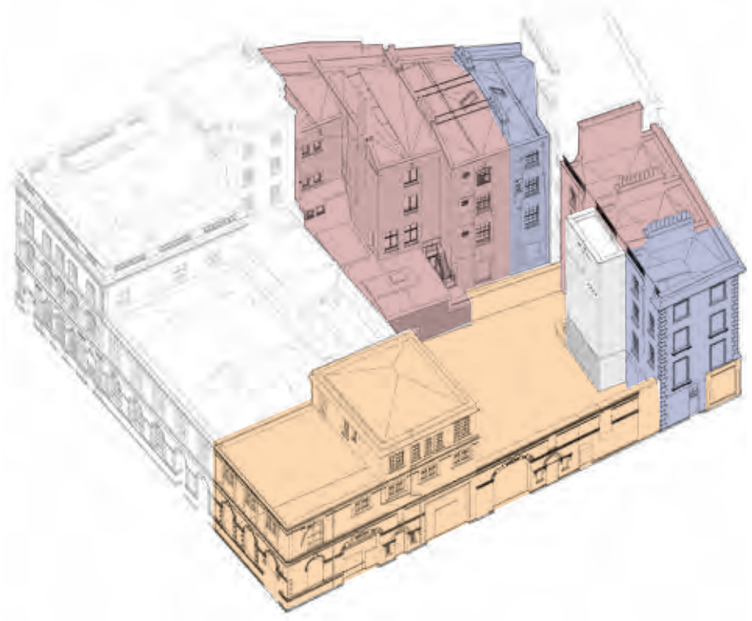
Extracted pages from this application's DAS, highlighting analysis undertaken to 16a-18 West Central Street. Please refer to DAS Chapter 7.0 for further information

4.0 Existing Building Appraisal and Confirmation of Justification for Demolition

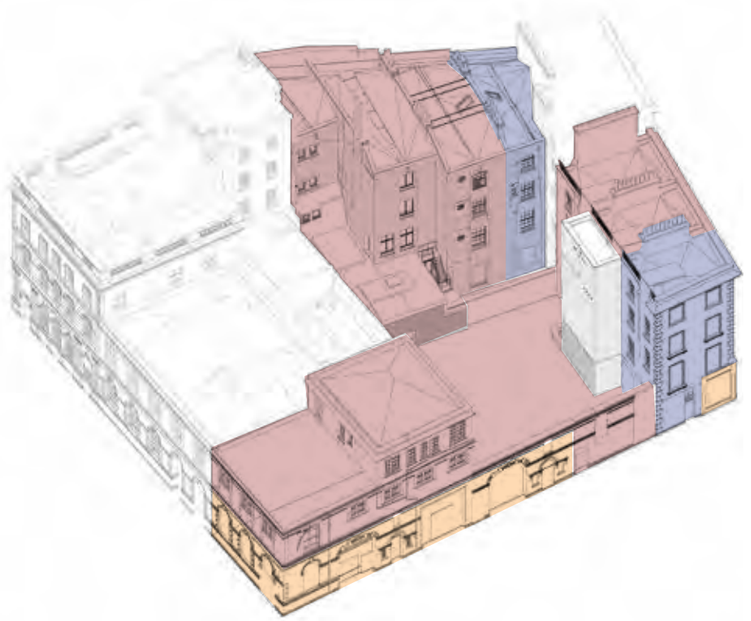
Several scenarios have been analysed for retaining all or part, noting that 16B West Central Street (adjacent to the listed 10 Museum Street) is a single storey 90s extension.

The scenarios assessed are:

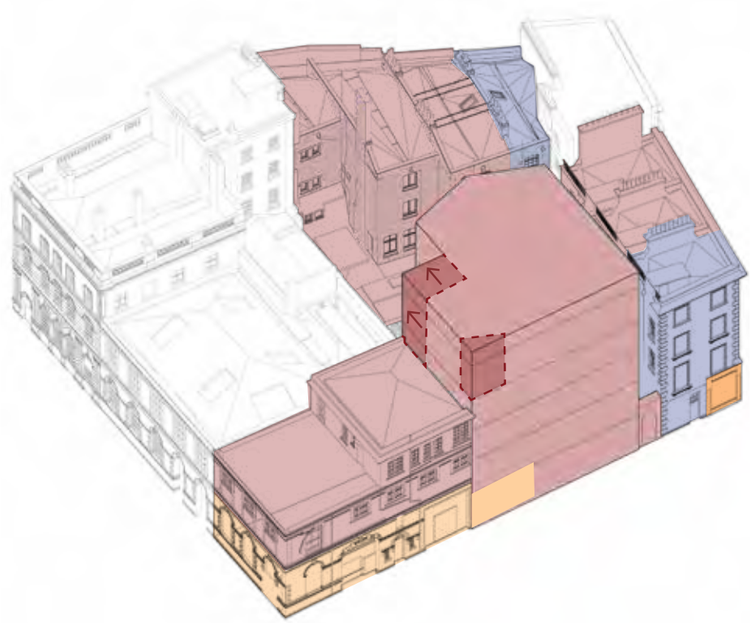
- Options 1A and 1B - Retaining all of 16a-18 for use as a. Residential and b. Commercial
- Option 2 and 3 Retention of 16a and 18 as commercial (2) or residential (3) and redevelopment of 16B as residential



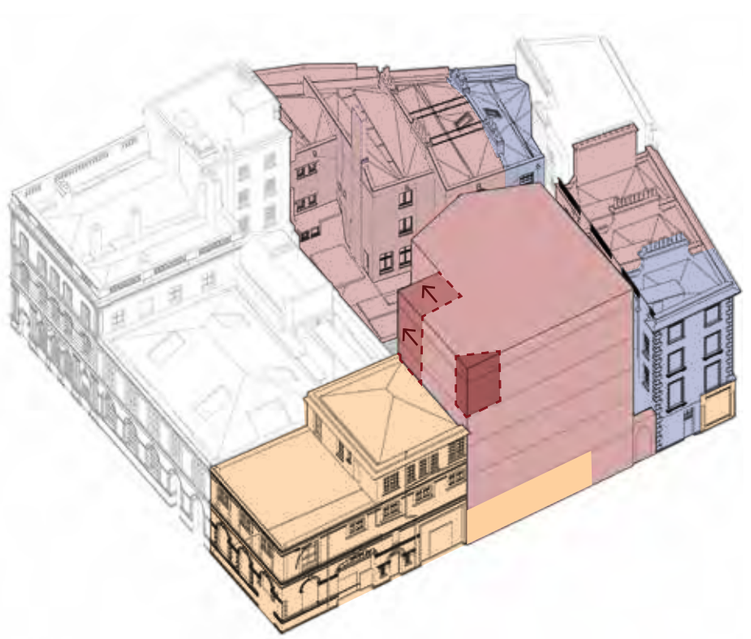
Option 1A: Full Retention (16a and 18 as commercial) [Discounted]



Option 1B: Full Retention (change to resi) [Discounted]



Option 2: Retention of 16a and 18 (change to resi); replacement of 16b with new build [Discounted]



Option 3 - retention of 16a and 18 (retain commercial); replacement of 16b with new build [Discounted]

Key

- Commercial
- Affordable Housing
- Market Sales

4.0 Existing Building Appraisal and Confirmation of Justification for Demolition

The adjacent table provides approximate floor areas (sqm GIA) by use class for the four options and an analysis of the various scenarios arising from these and their impact on residential delivery and quality compared to the submitted scheme in the following tables and is summarised below. This takes the planning scheme as the baseline.

The option to extend the existing 16a-18 has not been shown in this exercise, however this was discussed and rejected previously as part of the pre-application process in connection with the original proposals for the site, see section 7.4 of the DAS.

The submitted scheme exceeds the other options in the ability to provide a greater quantum of much needed affordable housing. All the alternative options result in a loss of affordable housing floorspace of between 11-64% against the planning scheme baseline. The alternative options also result in a reduction of the percentage of affordable housing against the mixed communities Local Plan Policy H2 requirement of 50% of the uplift of required provision.

The submitted scheme also provides high quality residential provision with double aspect homes, LHDG compliant homes including wheelchair accessible served by a shared courtyard. With retention of all or part of 16a-18 WCS as residential, the quality of the space provided is compromised; the retention also potentially compromises the courtyard amenity provision.

In addition to the residential quantitative and qualitative betterments described above, the proposals for West Central Street also enable the achievement of a number of key planning policy objectives in relation to the public realm including:

- Providing homes and an increased residential population to promote life and vitality.
- High quality and clearly legible buildings.
- Architecture which engages more positively and proactively with the street by providing doors, windows and entrances, which directly connect with and overlook the public realm and are accessible from the pavement.
- The provision of substantial additional active frontage at ground level to address the corner and street including new residential entrances, the courtyard entrance, commercial entrances and ground floor fenestration as well as upper-level balconies to promote activity, community and surveillance.

The extent of demolition has been minimised and is described above, images are provided at Appendix 2. It is therefore not possible to retain more of the existing buildings at 16-18a West Central Street as to do so would prejudice the ability of the scheme to make the best use of land in accordance with policy and to provide housing of a required standard and quality.

WCS Scenarios - Sqm GIA by use-class	**Retail (Class E)**	**Office (Class E)**	**Market Housing**	**Affordable Housing**	**Plant**	**Total**
Submitted Scheme (baseline)	692	-	294	1,692	569	3,247
Option 1A - full retention (16a and 18 as commercial)	692	631	294	526	569	2,712
Option 1B - full retention (change to resi)	692	-	294	1,157	569	2,712
Option 2 - retention of 16a and 18 (change to resi); replacement of 16b with new build	667	-	294	1,491	581	3,033
Option 3 - retention of 16a and 18 (retain commercial); replacement of 16b with new build	547	325	294	1,285	581	3,033

Table highlighting the area impacts of the proposed 16a-18 West Central Street Retention Options

4.0 Existing Building Appraisal and Confirmation of Justification for Demolition

Selkirk House

Considered in great detail in the Retention and Redevelopment Options Review. The key challenges in relation to the existing building can be summarised as follows:

MEP and fit-out
Our investigations show that the MEP installations and fit out were nearing end of life when the occupant left and were further damaged extensively when the occupier removed any items they believed to be of value to their business at the end of their lease. These elements cannot be retained as are to be removed.

Façade
The façade has been overclad with limited firestopping between the original and 2002 re-clad. It has been identified as dangerous and needs to be removed and replaced for those reasons even before energy performance is considered. The facade cannot be retained and is to be removed.

Floors 14-15 (7%) *(% of structrue by weight)*
These floors are structurally complex with sheer walls and very constrained. These cannot be retained except for very limited use.

Cores (3%)
These are limited and cannot be retained in their current form without significant modification and imposing severe constraints on the use of the building.

Floors 4-13 (25%)
As set out in detail in the Retention and Redevelopment Options Review: these are on a very tight column grid and have low slab heights. These features would be detrimental to achieving suitable offices spaces and / or residential spaces. The columns would interrupt the accommodation and plan. The low slab heights would prevent the achievement of a suitable floor to ceiling heights, would affect the quantum and quality of light within the building, would negate the ability to provide proper dual aspect, would reduce the amenity, quality and practical utility of any space and would be oppressive, especially in long term residential use.

For these floors to be supported during the demolition of the Car Park Podium significant amounts of steel and concrete would be required for temporary propping. The resulting space would be inflexible and poor quality.

Car Park Podium (40%)
The slabs throughout are sloping or aligned to the sloped levels and need to be removed for any non-car park use.

Basement box and substructure (25%)
This is proposed to be retained in the new scheme.

As a result of the above, the vast majority of the building is not suitable to retain and severely constrains the reuse of the building. Furthermore, of the elements that could be retained c. 25% of the structure by weight are to be retained in the proposed scheme. This approach avoids the embodied carbon in new concrete and the construction operations for any removal and replacement basement box and substructure.

The extent of demolition has been minimised and is described above, images are provided at Appendix 2. Based on the above, it is not possible to retain more of Selkirk House car park and tower for technical reasons and because it would prejudice the ability of the scheme to make the best use of land in accordance with policy, to provide a suitable mix of uses and sustainable employment uses.

Aerial View of Selkrik House


View of Selkirk House from High Holborn

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5.0 Conclusion

5.0 Conclusion

Summary

This document brings together in one place the work done to understand the site and its buildings and the work carried out by the team to make considered, informed decisions on the appropriate approach to existing buildings on the site. This forms part of our consideration of Circular Economy principles underpinning the GLA decision trees that form part of the application.

This drew upon extensive investigations and a thorough review of planning policy. Careful analysis of the suitable uses was done and different options were then considered across the site. In narrowing these options, design studies were carried out on land uses identified for different elements of the site. More detailed analysis of different approaches to retention were carried out as appropriate to carefully test the sustainability approach.

Through this work the team have been able to confirm that the extent of demolition has been thoroughly tested and minimised. All elements of existing buildings that are suited to the proposed use are to be retained and have been incorporated into the proposals.

Finally a pre-demolition audit has been completed as part of this application to ensure that each element of the building that is to be demolished is carefully considered for re-use at maximum value.

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Appendix 1

Table of queries and responses

Table of queries and responses

Appendix 1 - Comments and responses

This document outlines the relevant comments received from statuatory consultees that this document seeks to respond to. See relevant memos and addendums for full content

1.1 GLA Circular Economy feedback

	Circular economy element		Comment [abridged for – see memo for full comment]	Applicant response
2	**Pre-Redevelopment Audit**	The Applicant **has partially** provided a Pre-Redevelopment Audit assessing the existing site, including any buildings, structures and materials.	Whilst it is welcomed that the Applicant has provided a Retention Options review this predominantly focuses on the 1 Museum Street building. The Applicant should provide a Pre-Redevelopment Audit which considers all existing buildings and structures on the site, including the following information: description of existing buildings, the building's age, state of repair, key materials, photos of typical internal spaces and facades, and site plans. As outlined in the comment in Row 27 above, the Pre-Redevelopment Audit should provide information to support the Applicant's responses to the decision tree. The Applicant has provided an analysis matrix which explores how the options respond to each of the key demands of the brief however does not provide adequate narrative to describe how the scoring has been allocated to each of the options on an objective basis. The Applicant should provide clarification. It is acknowledged that the car park poses some substantial constraint in limiting potential for retention as part of the proposed scheme. With respect to the retention options for the 17-storey Selkirk House however, it is noted that the Pre-Demolition Audit states that the Travelodge building was originally developed as an office building and later converted for use as a hotel, with the original use type aligning with the proposed, the Applicant should clearly define why the building could not be converted back to its original use. The document considers several issues with the existing buildings which are referenced as drivers for the redevelopment however exhibits limited consideration of potential solutions through the retention scheme options. The Applicant should clearly communicate how these constraints could not feasibly be addressed by the retention scheme options. The Applicant should provide a robust rationale for demolition proposals across the site in conclusion of the considerations within the retention and redevelopment options appraisal for 1 Museum Street and to be presented for the remainder of the site.	As acknowledge we have undertaken a comprehensive assessment of the existing Selkirk House as part of the Retention and redevelopment options and whole life carbon comparison report. This building makes up the substantial majority if the existing building on site and covers the area where 1MS, VL and HH buildings are proposed. All comments relating to retention options for Selkirk House are considered to be addressed in detail within this substantive report; we acknowledge that this information could be more clearly placed within the GLA's framework for pre-redevelopment audits and this is addressed in the Clarifications and Responses on Demolition Justification including Pre-redevelopment Audit and Retention options appraisal document. The only other element of the site where substantial demolition is proposed is 16a-18 WCS. The majority of the scope of the pre-redevelopment audit is set out in p.296 - 316 of the DAS. Please also refer to the updated pre-redevelopment audit provided for WCS with the Clarifications and Responses on Demolition Justification including Pre-redevelopment Audit and Retention options appraisal. Clarification - the matrix provided in the retention options report is provided as a high-level overview of performance of the options against the criteria. Where quantitative assessment is possible the scoring reflects highest to lowest performing. Where this is not possible a qualitative assessment has been undertaken based on the information outlined in chapter 5. This matrix is provided as headline reference only and we can confirm that the conclusion of the report is based on the in-depth analysis. Clarification - We have undertaken extensive analysis of the existing Selkirk House building. The building was designed as offices in the 1960s and more recently (early 2000s) converted to a hotel. As noted, the existing car park cannot be reused due to sloping floors and low slab to slab height; retention of the office building above alongside demolition of the car park would require substantial and carbon intensive temporary works. The building cannot be used in its current form for office as it cannot safely be occupied at a density expected for modern offices due to the core arrangement (it can only be occupied at an estimated 1:20). Surveys provided in the pre-redevelopment audit evidence that the facade and MEP are beyond their useful life (where still present) and would need to be replaced. The building also has significant design limitations that would not be addressed by refurbishment including low slab to slab. The Retention and Redevelopment Options and Whole Life Carbon Comparision report considered in detail different retention options from medium to high intervention, their ability to deliver on a variety of sustainability and policy factors and their comparative WLC. Further clarification and justification for demolition can be found in the Clarifications and Responses on Demolition Justification including Pre-redevelopment Audit and Retention options appraisal.

1.2 Camden Council Sustainability

Comment	Applicant response
Confirmation is required on whether the condition and feasibility study and options appraisal justifies the proposed substantial demolition.	An extensive review of alternative options has been carried out in order to justify the level of demolition proposed across a number of sustainability and planning policy grounds. In addition to the Retention and Redevelopment Options and Whole Life Carbon report submitted with the planning application this document draws together information from the planning application alongside supplmentary clarifications to set out the justification for demolition of 16a-18 and Selkirk House.

Table of queries and responses

1.3 GLA WLC Memo

Retention of existing buildings and structures		
12	The applicant should confirm that options for retaining the existing buildings and structures have been fully explored before considering substantial demolition. '295AB_1MS-Selkirk House Retention Options Review & WLC Comparison_Final Draft_230202 FINAL' demonstrates that the refurbishment / partial retention options are under analysed, particularly Option 3 which deals with many of the issues identified whilst retaining a significant proportion of the existing Selkirk House and providing a similar scale development to Option 4. The applicant should provide a robust rationale for demolition in conclusion of the considerations within the retention and redevelopment options appraisal. The applicant should explain the following assumptions used in the WLC models of the options in the additional evidence: - Service life assumptions made for Options 1-3 and 4-5. - Replacement timelines for the Fit-out. Both of the above assumptions appear to be based on the applicant's assumption that the refurbished options would have a larger tenancy turnover compared to the new build options which does not appear to be based on any referenceable evidence. There is a concern that the disparity in the modelling assumptions used for the refurbishment / retention and new build options makes the new build options favourable compared to the refurbishment / retention options from a WLC perspective. The applicant should confirm the Building Element Categories which have been modelled for all the potential design options.	An extensive review of the existing buildings, planning policy and alternative development options has been carried out for Selkirk House – which covers the site of the proposed Vine Lane and High Holborn buildings, in order to establish the design response. This is captured in the Retention and Redevelopment Options and Whole Life Carbon Comparison report which incorporates the scope of the pre-redevelopment audit. This concludes that the level of demolition is justified in order to achieve the aspirations for the site and wider sustainability aspirations. See also Clarifications and Responses on Demolition Justification including Pre-redevelopment Audit and Retention options appraisal (September 2023). An updated pre-demolition audit by Arup addressing the requirements of the GLA Circular Economy Guidance (2022) has been provided in parallel to this memo. Drawings identifying the extent of demolition for the planning scheme can be found on page 27 of the aforementioned retention options report and further detail has been provided in Clarifications and Responses on Demolition Justification including Pre-redevelopment Audit and Retention options appraisal (September 2023). All service life assumptions and replacement timelines for fit out have been outlined in the report and are in line with RICS PS Guidelines, any deviations for options have been outlined in the clarifications of the main report. It is clarified within the report for the resubmitted application that the differing assumptions applied to options 1-3 and 4-5 regarding replacement timelines for fit outs is based on a limited data set and therefore that while this assessment is deemed valid, it is included as an additional consideration only. All Building elements included from RICS PS Guidance have been included.

1.4 Hilson Moran Third Party Review on Behalf of Camden Council

Comment number	Reviewer Comment	Applicant response
9	Alternative uses for the site Camden's CPG guidance suggests exploring different uses to maximise reuse opportunities for existing buildings. This recommendation does not appear to have been implemented. The optioneering study includes only options for a commercially led development of Selkirk House. In this respect, the report states: earlier proposals for the site - while in previous ownership - have explored alternative uses, such as a hotel. However residential or hotel in Selkirk House did not meet the wider brief requirements. It is not clear which brief requirements are being referred to. Either those from the Client or those dictated by Camden? Clarification is required on this issue. The report also adds: the issues affecting the existing building and their implications (chapter 4.0) and analysis (chapter 5.0) apply equally, though in different degrees, to any alternative repurposing of the building for residential or hotel use. This last statement is not accompanied by sufficient supporting arg uments. Theoretically, an existing hotel could have a greater chance of being reused if maintained in its current use. A possible conversion into residential use could help resolve, or at least mitigate, some of the issues that prevent a successful transformation of the existing building into a modern office building (e.g. low floor-to-ceiling heights, existing upper floor's structural grid). It is understood and accepted that some of the issues of the existing site, as outlined in the optioneering study (4.2 and 4.3) will require substantial interventions, regardless of the proposed use at the upper floors. In other words, an alternative use won't	Clarification - the brief referred to is the Development Brief set out on in para 1.4. This has been established the site based on policy, commercial and ESG considerations. Commentary has been provided on alternative uses within the *Retention and Redevelopment Options and Whole Life Carbon comparison* report. However due the large number of variables associated with different land uses it was considered to extremely difficult to draw useful comparisons across different uses. Note -Queries from HM, GLA and LBC have been accumulated together for responses in the*Clarifications and responses on demolition justification including Pre-redevelopment Audit and retention options appraisal* document appended to the Circular Economy Statement This document brings together information from the planning submission and further clarifications including addressing further the assessment of other uses for the site.
10	Existing building services, thermal performance and energy efficiency Camden's CPG guidance require applicants to examine the condition of existing building services, estimate their remaining lifespan and weigh the pros/cons of upgrading. The assessment should also include an examination of the existing thermal performance and energy efficiency. The optioneering study do not respond to the above requirements. All options presented assume a full MEP renewal, albeit with differing solutions . Whilst this could be a sensible approach, appropriate supporting arguments should be provided. A description of existing building services is not provided, except for the configuration of existing lift provision (described as not suitable to meet current commercial standards). Information relating to the thermal performance and energy efficiency of the existing Selkirk House is not provided. Further clarity should be provided by the applicant.	Clarification - Limited assessment of the existing building services equipment has been carried out. The equipment is bespoke to the previous user (Travelodge) who removed any elements they considered to be of value upon their lease expiring. Given the proposed redevelopment scope presented in all options (i.e. minimum of major refurbishment with renewal of the building fabric), retention of existing building services would necessitate decommissioning and storage prior to re-use in all cases. Anything considered for reuse could therefore be considered to apply equally to all options and thus is not considered likely to have a meaningful difference to the comparative performance of the various options. It should also be noted that - The last major refurbishment of Selkirk House was undertaken in 2002, and therefore the majority of the existing building services systems are reaching or beyond the end of their economic lives. - The existing fit-out is for hotel use, the requirements of which differ substantially to that of office use - The existing building has now been vacant for over 3 years meaning that the condition of the existing services is likely very poor. Note - Queries from HM, GLA and LBC have been accumulated together for responses in the*Clarifications and responses on demolition justification including Pre-redevelopment Audit and retention options appraisal* document appended to the Circular Economy Statement. This document brings together information from the planning submission and further clarifications including providing information on the numerous surveys and investigations carried out on the existing buildings to inform the optioneering.

Table of queries and responses

14	Use of intrusive surveys to determine the technical conditions of existing buildings To assess potential reuse of existing buildings, Camden's CPG guidance require applicants to conduct a series of technical studies, also based on intrusive surveys. This requirement does not appear to be met at present. Both inves tigation activities conducted by ARUP (pre- demolition audit) and HTS (pre-reclamation audit) are based on visual inspections and other non- intrusive forms of investigation. We understand that the former occupant Travelodge ceased all operation in June 2020 and the existing Selkirk House building is vacant since then. The applicant should clarify the reasons why it was not possible to conduct intrusive investigations in this period of time. The use of intrusive surveys can provide essential information to establish the potential reuse (either onsite or offsite) of existing materials, as well as being an element of support for the decision-making process relating to possible development options.	Clarification - We have a detailed understanding of the existing building. For the purposes of purchase, design and management a number of intrusive and detailed surveys have been carried out including: - Trial pits - Core holes - Opening up works by Erith - Asbestos - Building surveyor survey to inform the purchase - Building surveyor surveys to assess health and safety requirements; a series of works have been undertaken to the building as a result of this. - Professional team have carried out their own inspections and investigations - For the WCS buildings we have undertaken extension and thorough audits of the existing fabric as part of the heritage assessment and design process for these elements. Note - Queries from HM, GLA and LBC have been accumulated together for responses in the*Clarifications and responses on demolition justification including Pre-redevelopment Audit and retention options appraisal* document appended to the Circular Economy Statement. This document brings together information from the planning submission and further clarifications including providing information on the numerous surveys and investigations carried out on the existing buildings to inform the optioneering.
15	Existing structure constraints / limitations We note that there is no statement in the optioneering report clai ming that it is not possible to retain and upgrade the existing structure. Conversely, the optioneering report provides a description of the structural limitations of the existing building and of the potential interventions required to upgrade the existing structure to modern standards (e.g. strengthening works to increase loading capacity, temporary works to support the tower while demolishing the car park structure, etc). As such, retain and improve the existing building doesn't seem beyond the realms of possibility.	Clarification - We have set out in the application the justifications for the proposed scheme . The*Retention and Redevelopment Options and Whole Life Carbon Comparison* report identifies elements of the existing building that it is not possible to retain such as the car park floors and floors 14-15. Of the elements that might be retained, we are retaining the basement and substructure which make up a significant proportion of the total structure once the elements we cannot re-use have been excluded. Note - Queries from HM, GLA and LBC have been accumulated together for responses in the*Clarifications and responses on demolition justification including Pre-redevelopment Audit and retention options appraisal* document appended to the Circular Economy Statement. This document brings together information from the planning submission and further clarifications including addressing the statement that the buildings cannot be retained.

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Appendix 2

Images outlining extend of demolition

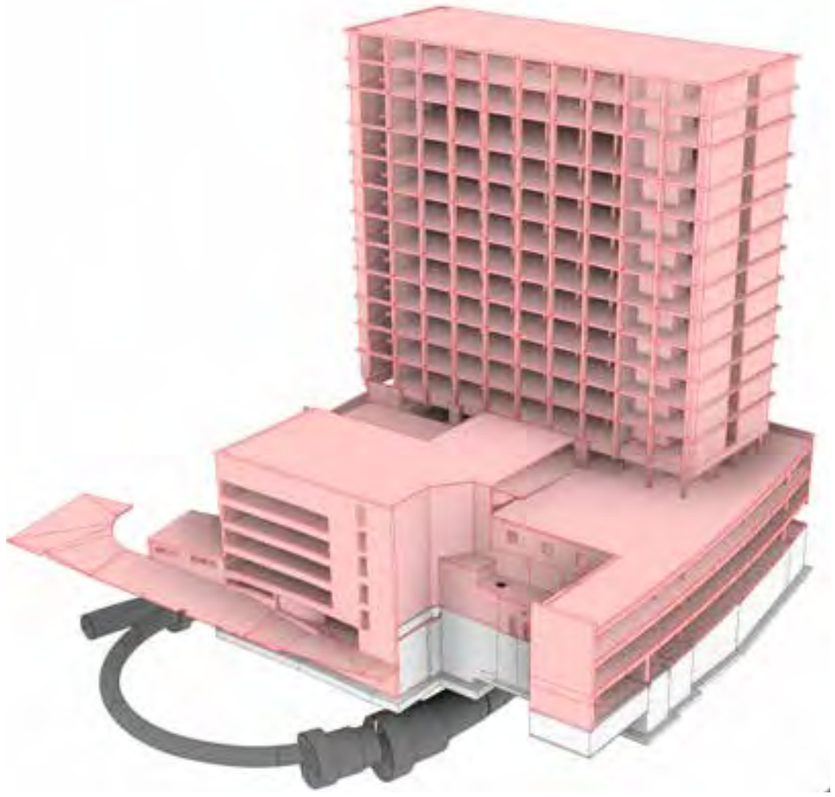
Appendix 2

Images outlining extent of demolition

The adjacent images highlight the extent of retention & demolition to Selkirk House.

Key:

Element	Colour
Proposed Retention	
Proposed Demolition	
Context	



Axonometric diagram highlighting the proposed demolition and retention to Selkirk House

Axonometric diagram highlighting the proposed retention to Selkirk House basement

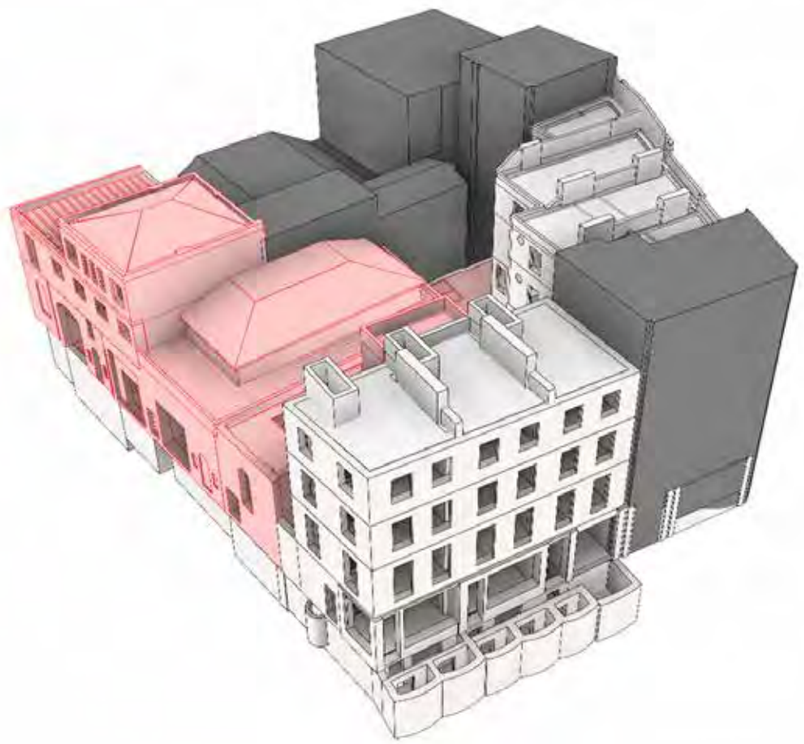
Appendix 2

Images outlining extent of demolition

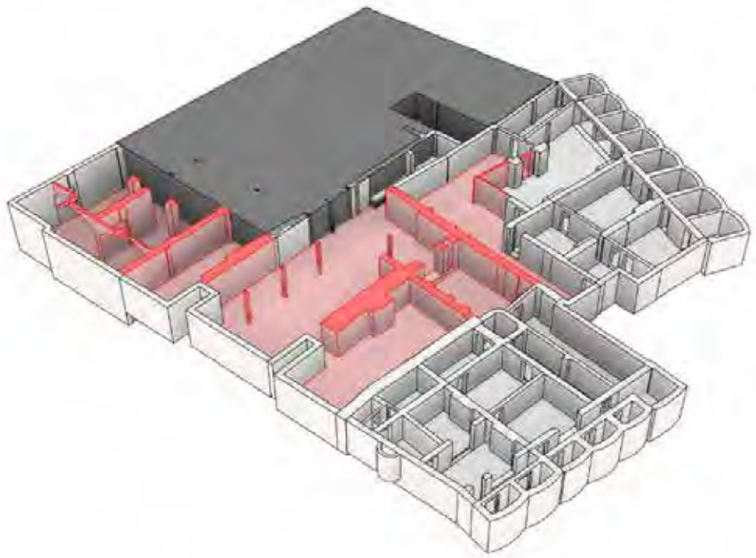
The adjacent images highlight the extent of retention & demolition to West Central Street

Key:

Element	Colour
Proposed Retention	
Proposed Demolition	
Context	



Axonometric diagram highlighting the proposed demolition and retention to 16a-18 West Central Street



Basement axonometric diagram highlighting the proposed demolition and retention to West Central Street

St Giles Quarter

DSDHA

High Holborn - UKPN, Structures & Lifts Feasibility Study

June 2024

High Holborn - Consented Scheme

Overview

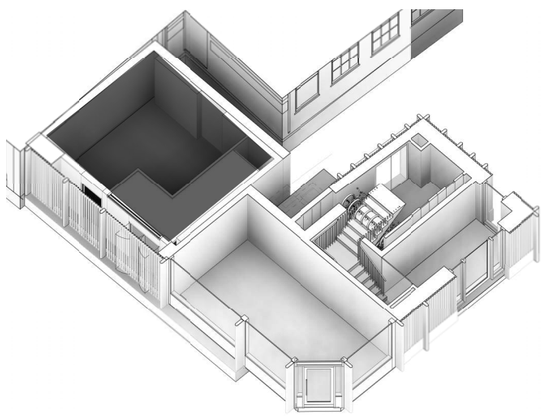
UKPN Substation

The existing UKPN substation lies in the basement of Selkirk House under the proposed High Holborn building's demise. This substation is no longer fit for purpose, suffering from a reduced headroom.

To keep the new substation in the basement would also entail onerous servicing and plant replacement that would imperil the ground floor layout to the proposed development.

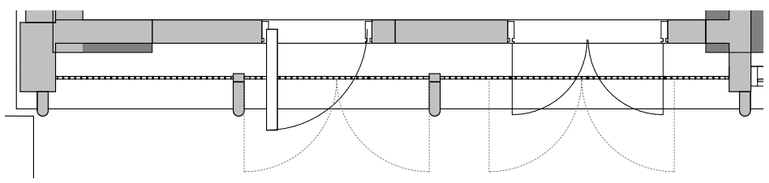
The new UKPN substation will be situated on the ground floor, accessed and serviced directly from High Holborn. To conceal the statutory louvred doors and ventilation grilles, aesthetical screens made of architectural metalwork have been devised. The bespoke design is to be further developed during the next stage.

The architectural metalwork will take a cue from the language of the new facades and will integrate gates in front of the UKPN statutory doors.



Ground Floor Axonometric View - UKPN Substation

UKPN Substation with Indicative Architectural Metalwork Screen



Proposed UKPN Substation Plan showing Doors and Architectural Metalwork Screen Panels

Proposed UKPN Substation on High Holborn

Existing UKPN Substation on High Holborn

High Holborn Design Studies

Design Considerations

Different disciplines will have to consider different aspects and below is a summary of the items discussed:

Structure
- Lightweight structure from LO1 – either steel frame with timber joists, CLT infill or cold rolled steel could be considered
- Proposed facade will need to be lightweight to work with the existing structural loads

MEP
- Minimum 2.5m wide access to existing UKPN substation (Existing condition 3.2m)
- Any services from residential units dropping over the UKPN footprint need to be diverted at high level ground floor - service zone would need to be reviewed with further design coordination to allow for this.

Drainage
- Any drainage from residential units dropping over the UKPN footprint need to be diverted at high level ground floor - service zone would need to be reviewed with further design coordination to allow for this.
- Any ground floor drainage would need to be diverted to avoid the UKPN demise

Fire
- UKPN requirements generally state 4-hour fire separation to the enclosure/demise

Facade
- Lightweight facade required to suit with the structural strategy
- Façade design of the consented scheme includes a GRC rainscreen façade – EOC confirmed 200kg/m2 to be assumed for the weight which is based on the previous stage 3 design (the glazing will be less than 100kg/m2).
- HTS noted that a SFS system with steel structural frame is more challenging in terms of detailing then using a RC frame
- Fire intumescent treatment of steel frame structure and tolerances required will need to be considered during Stage 2-3 design

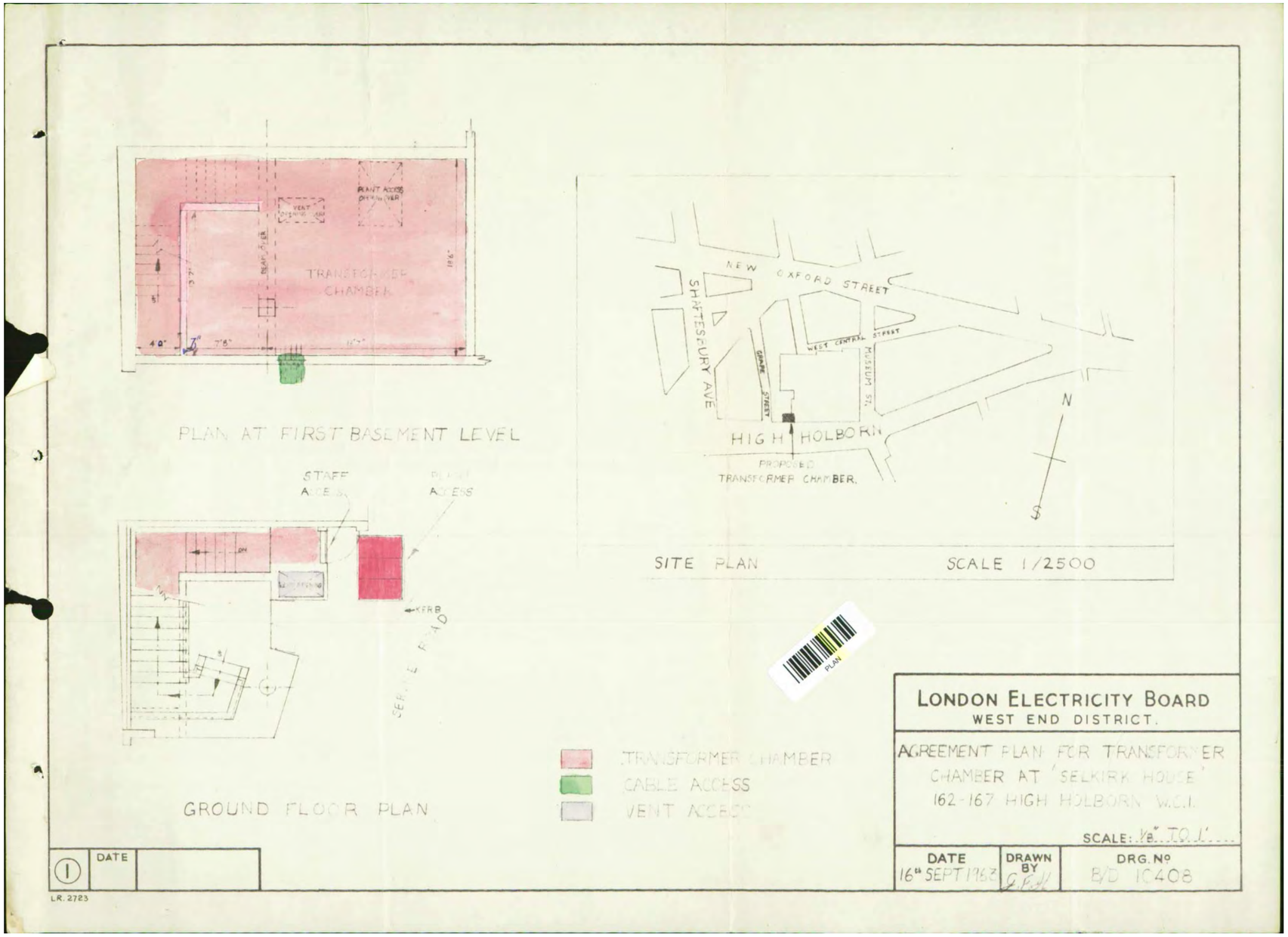
Fire escape route from 15 Grape Street
- Existing access route into High Holborn to be maintained - preference is no change to the current legal agreement which provides a fire escape onto High Holborn.
- Fire consultant / OFR recommended maintaining a secondary escape route onto Vine Lane would be beneficial in cases the primary route is blocked by use of UKPN access hatch for example.

Existing UKPN Substation

Existing UKPN records and photographs

Existing Sub-station at basement level

Ground floor access to stair going down to basement



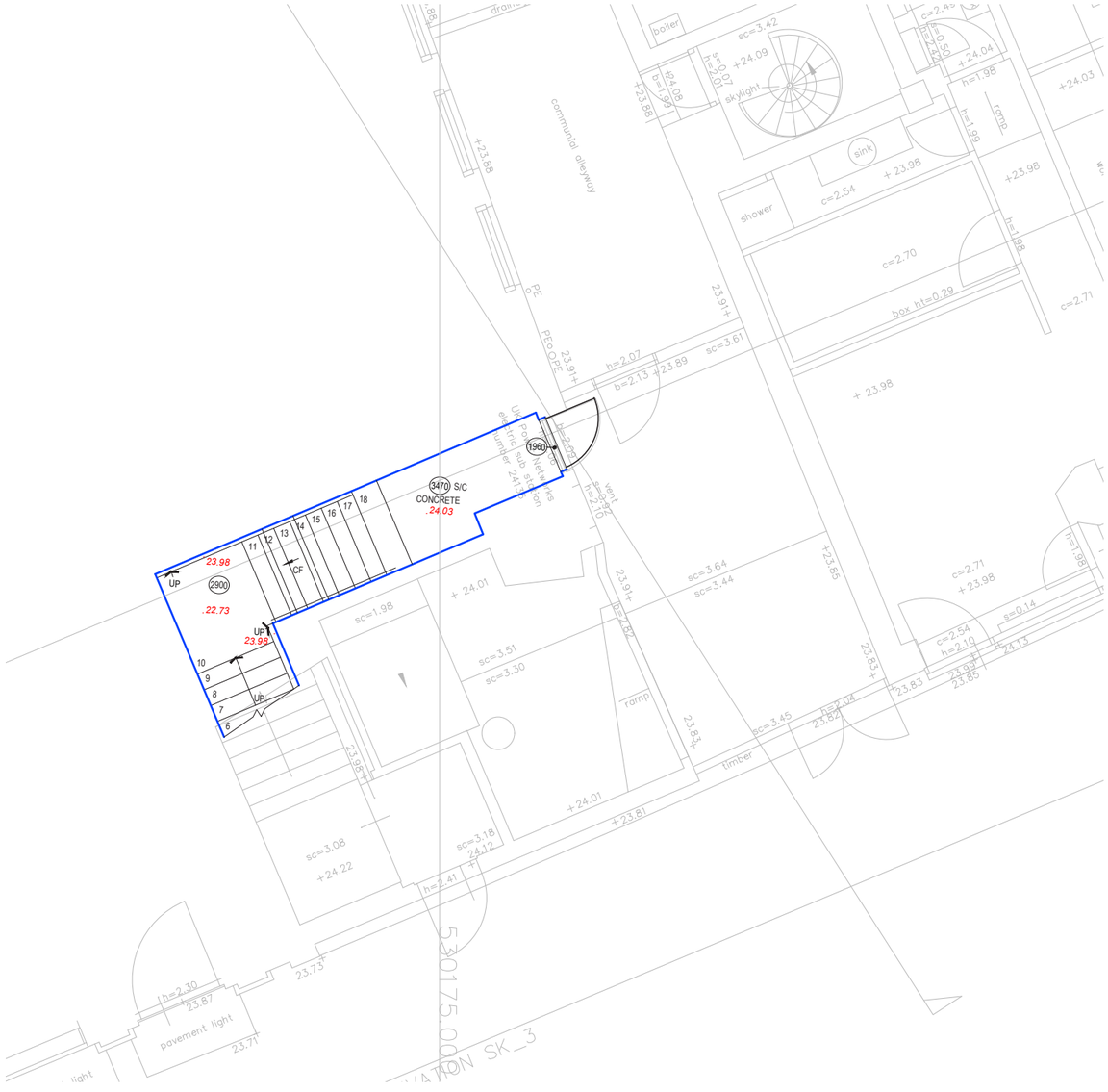
LPN lease dated 1 September 1966

High Holborn Design Studies

Existing UKPN Substation

Existing UKPN records and photographs

Basement Level Measured Survey



Ground Floor Measured Survey

High Holborn Design Studies

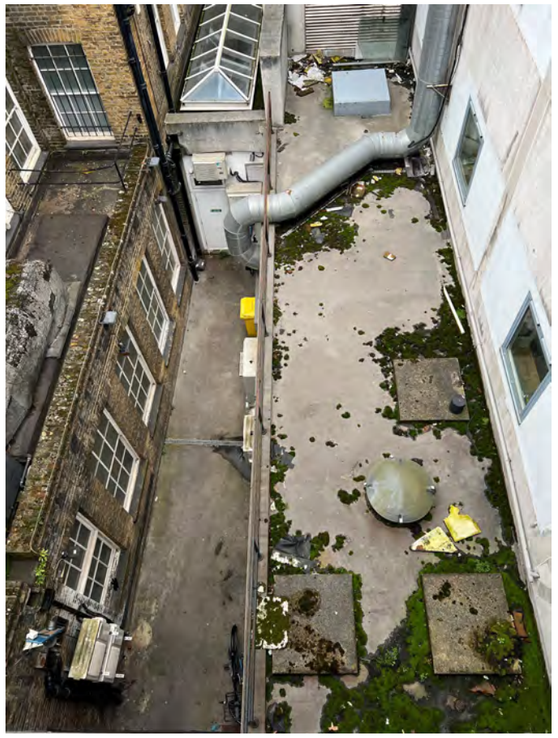
Third Party Access & Fire Escape

Extract from Title Plan:

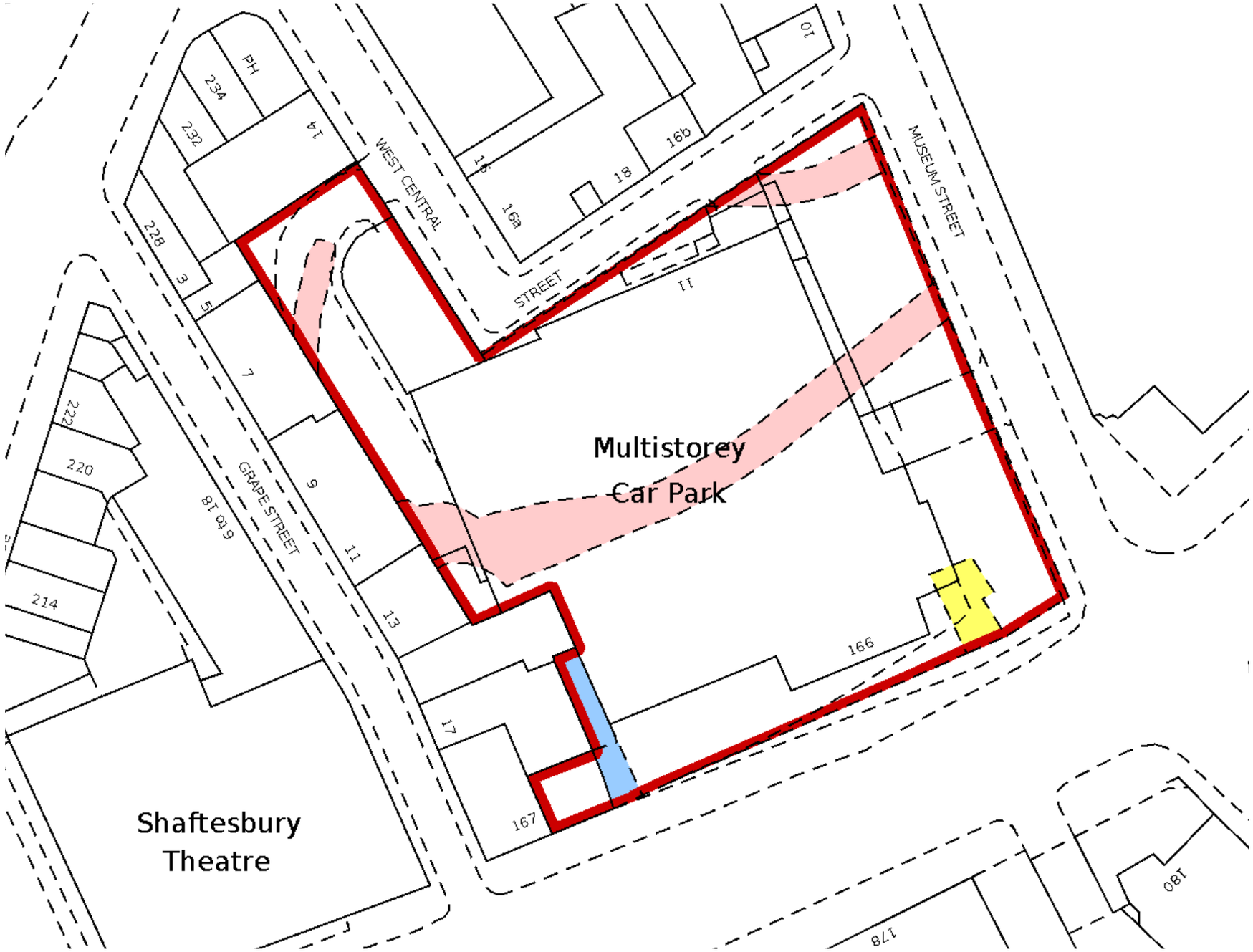
1 The passageway and the yard tinted blue on the title plan are subject to rights of way.

2 (27.07.2006) The parts of the land affected thereby are subject to the rights granted by the Lease of the transformer chamber at High Holborn dated 1 September 1966 referred to in the schedule of leases hereto.

3 (04.04.2003) The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto. The leases grant and reserve easements as therein mentioned.



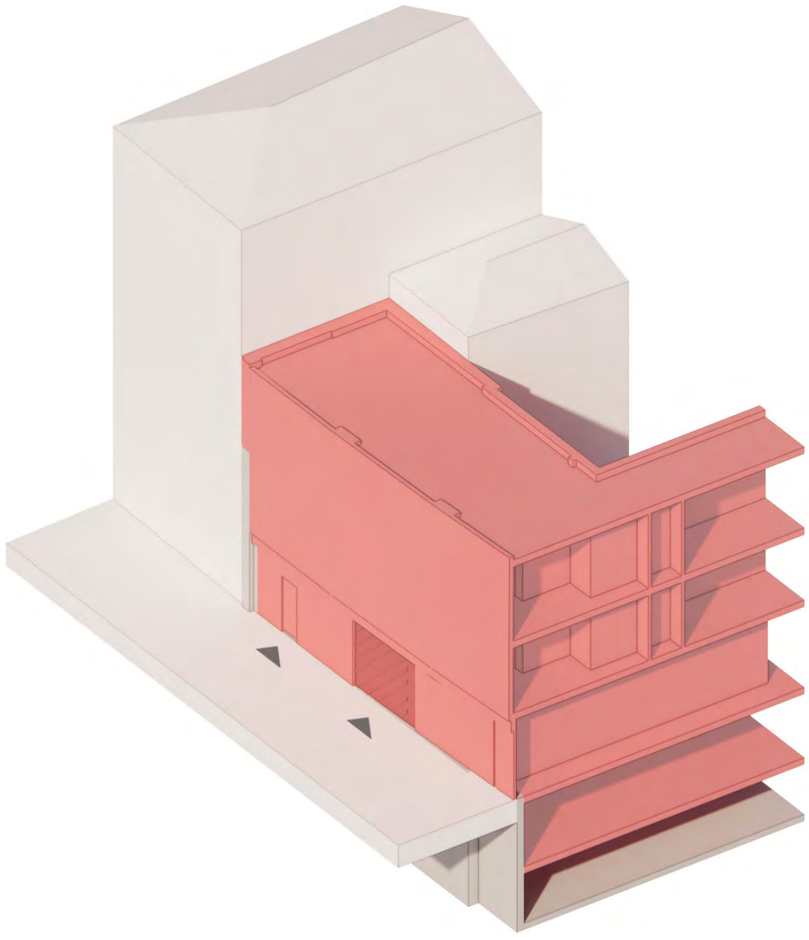
Site photo of 15 Grape St. fire escape route



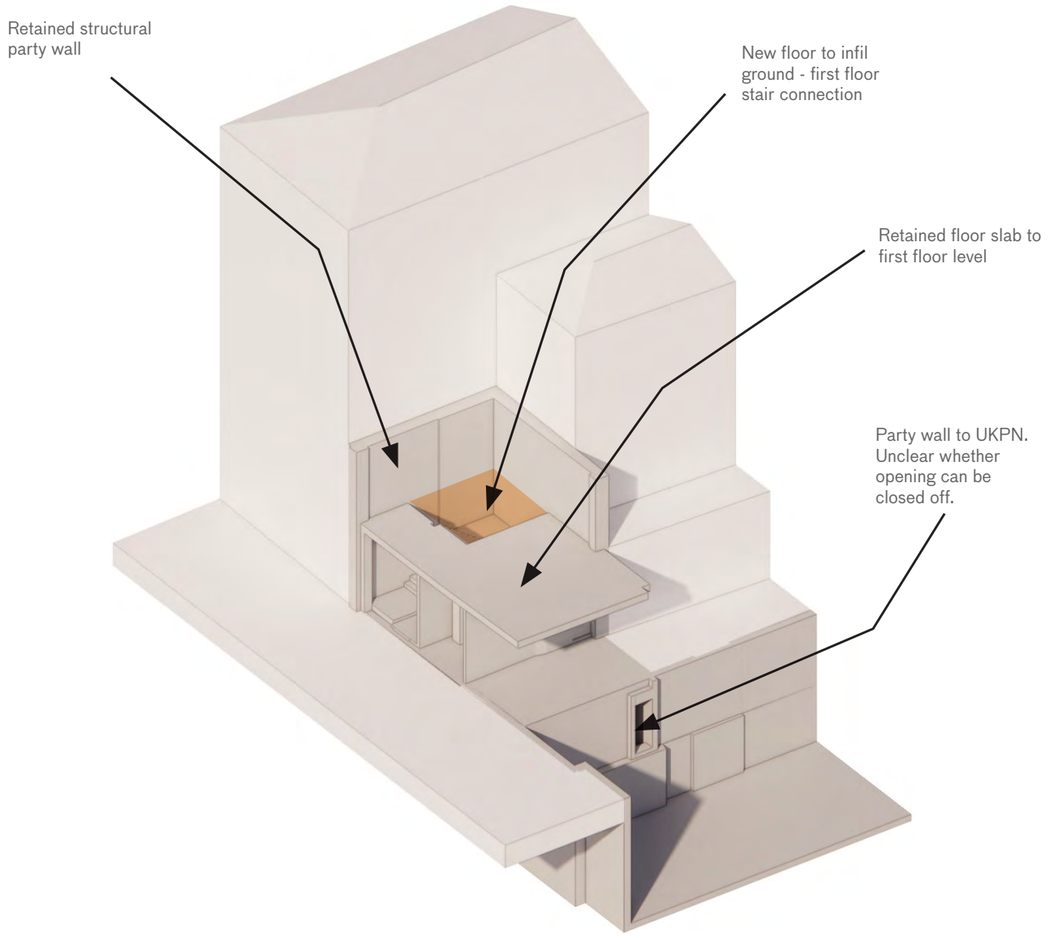
Title Plan highlighting fire escape to 15 Grape St.

Technical Considerations

Demolition Overview



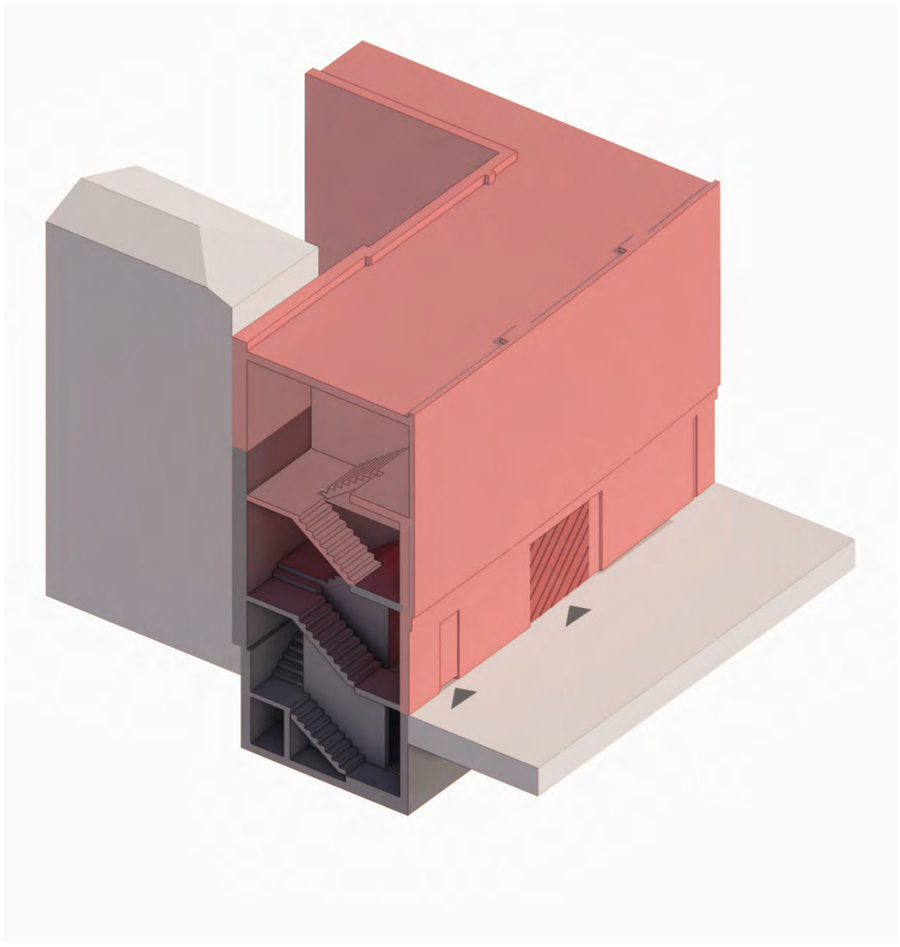
Demolition diagram (South East View)



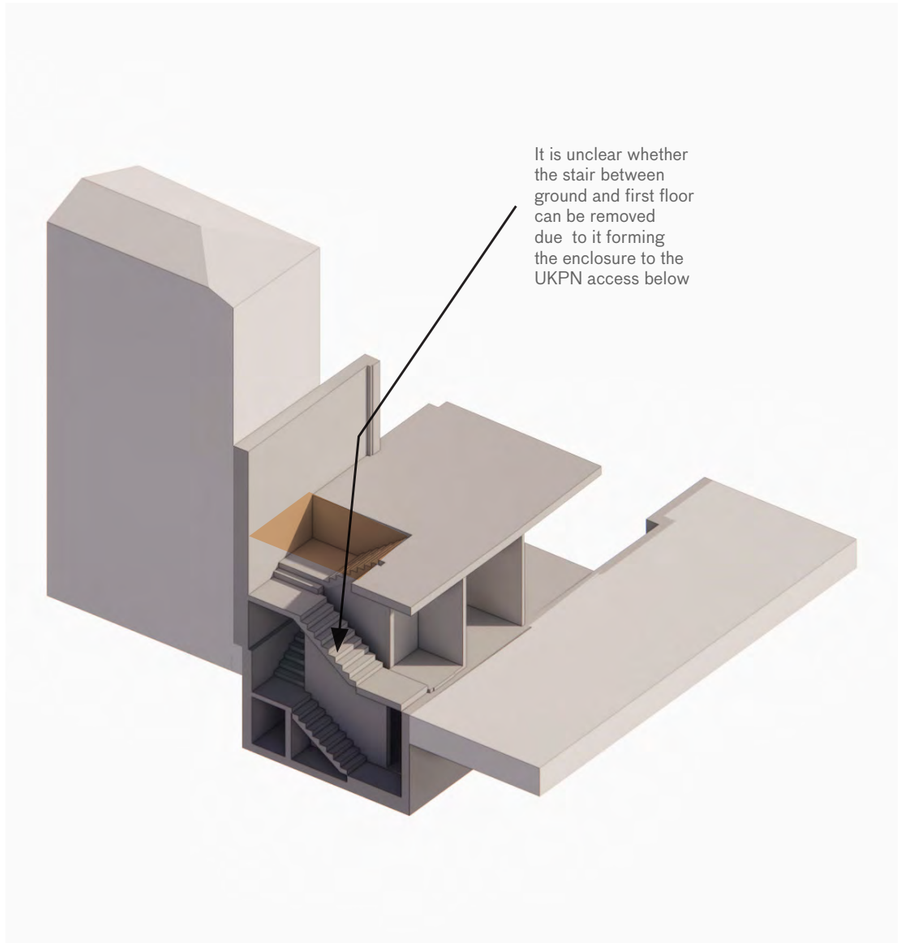
Retained structure diagram (South East View)

Technical Considerations

Demolition Overview



Demolition diagram (South East View)



Retained structure diagram (South East View)

High Holborn Design Studies

Technical Considerations

Carbon Savings

Anticipated carbon savings with retention option confirmed by HTS:

- 15 – 20% reduction in the embodied carbon of the structure compared with consented scheme - this would need to be firmed up once a structural scheme for the upper floors was developed.

Consented scheme - structural figures from the WLCA (confirmed by Scotch Partners):

- The total upfront embodied carbon (A1-A5) associated with the High Holborn Planning scheme is 391 tonnes CO2e, of which approx. 240 tonnes is associated with the structure.

High Holborn Design Studies

Technical Considerations

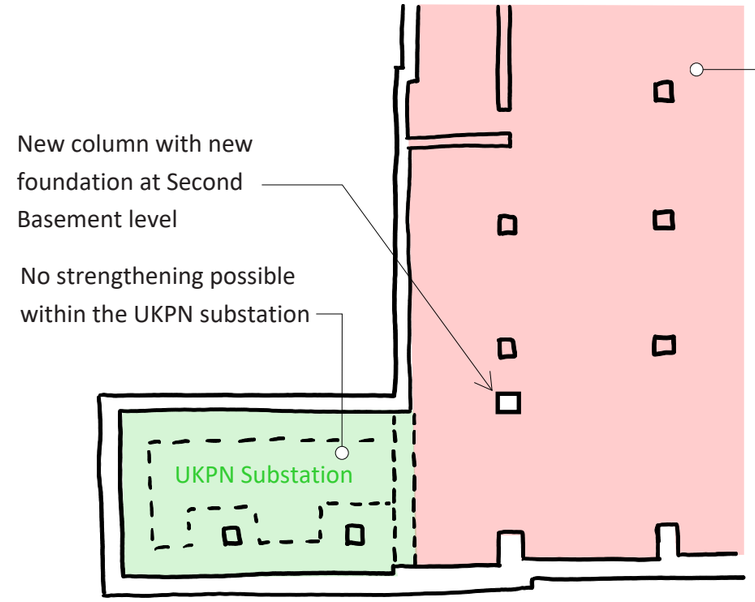
Higher-Risk Building (Building Safety Act)

Below are some considerations when determining whether a building is considered a higher-risk building under the Building Safety Act 2022:

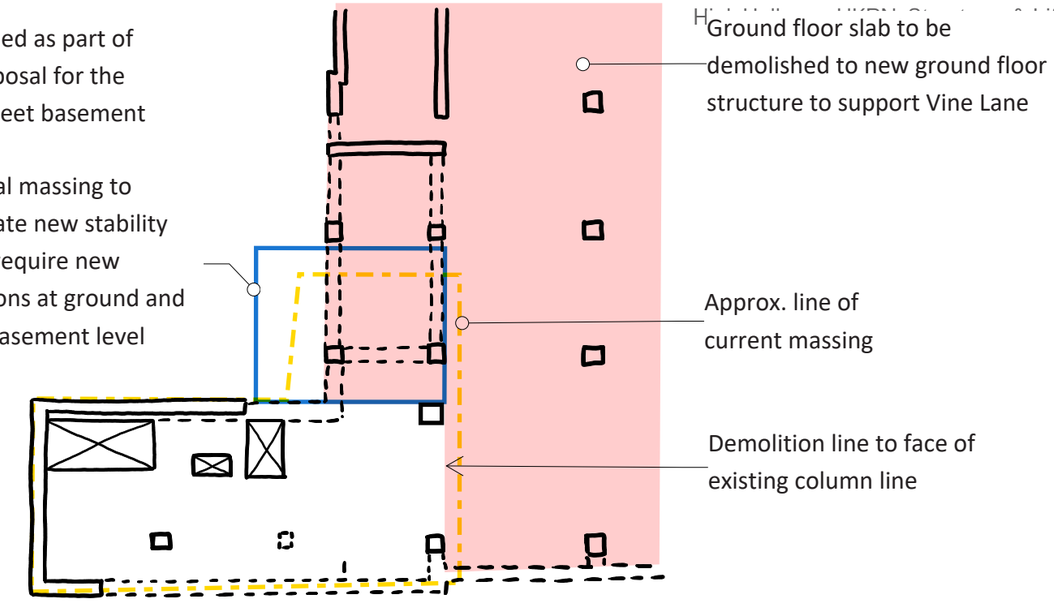
1. Existing basement door connection from UKPN to Selkirk House. Currently, the design team do not know if this connection can be blocked off.
2. Services connections to 1MS basement, namely:
   - Sprinklers
   - Water & Heating
   - Drainage
   - Electrical
3. For design and construction requirements the structure will need to be considered. Under Regulation 4, a proposed building which consists of multiple attached structures is considered one overall structure (one building). Assessment is required to understand whether it is also a higher-risk building against the height or storeys threshold and use criteria.

If the structure is separate and existing basement is in-filled (like the consented scheme) this will reduce the risk considerably of this building being considered a higher-risk building.

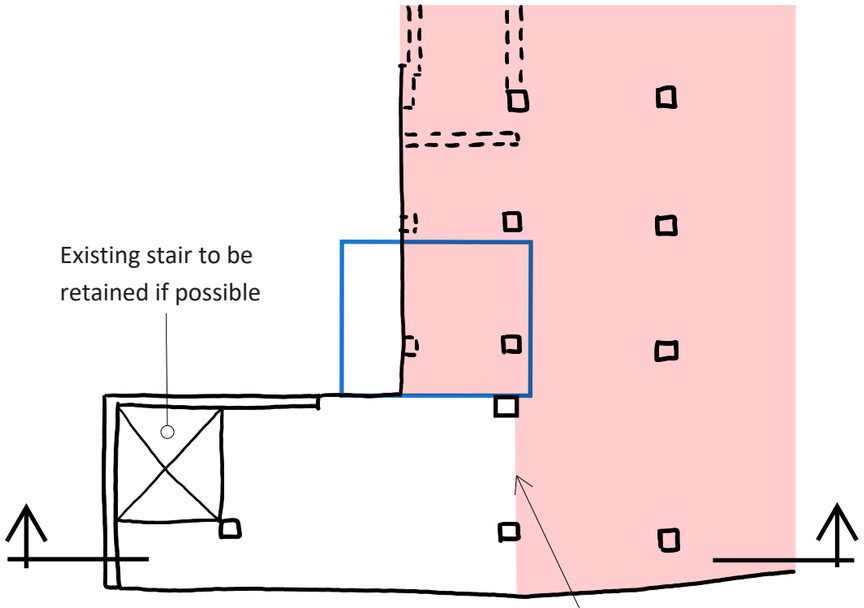
Basement Level Measured Survey



First Basement Floor Plan

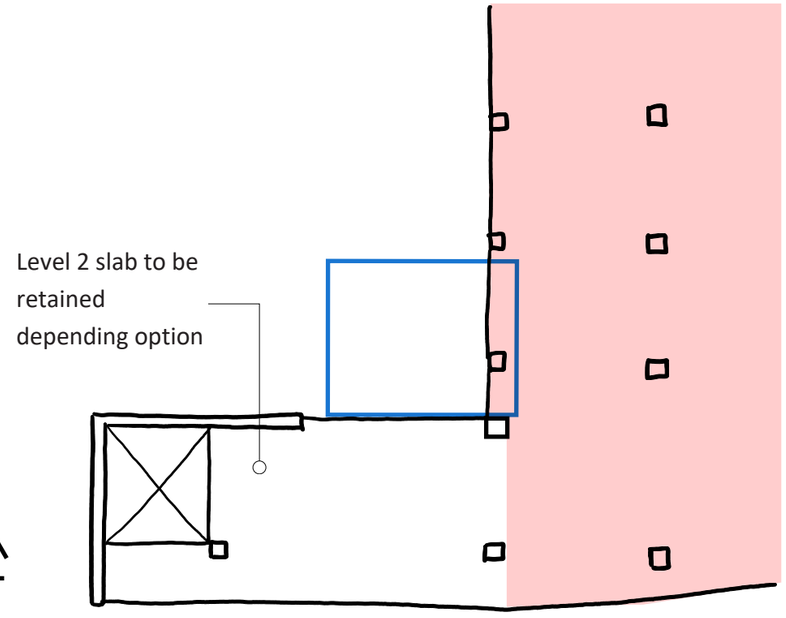


Ground Floor Plan

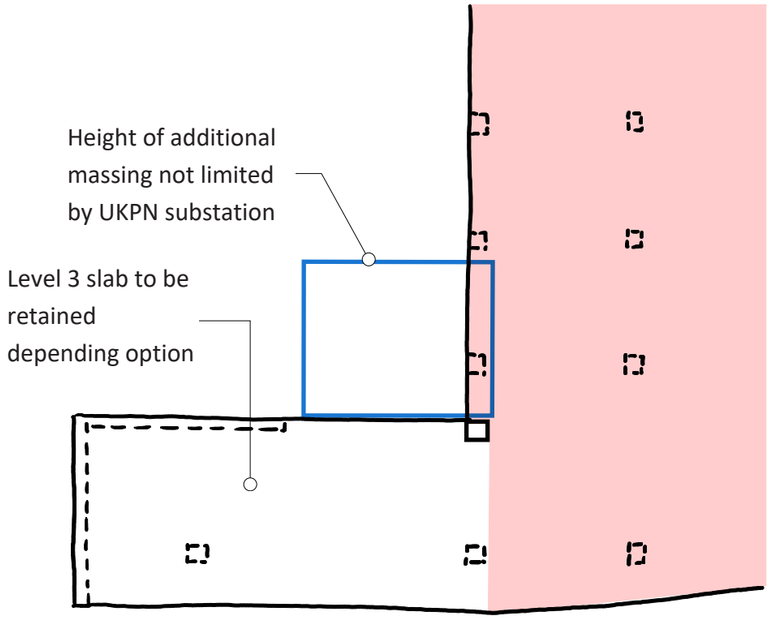


First Floor Plan

Slab to be cut back to existing column line. Existing columns to be retained



Second Floor Plan



Third Floor Plan

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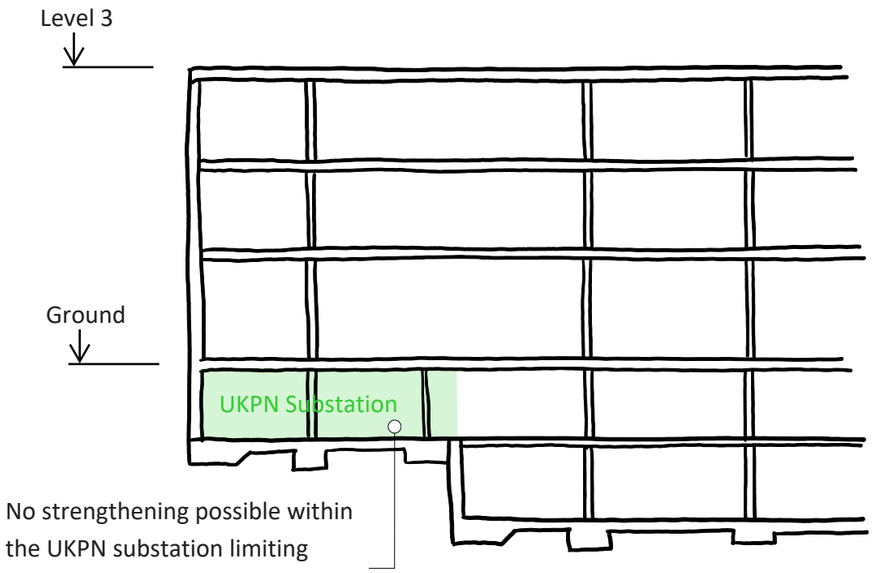
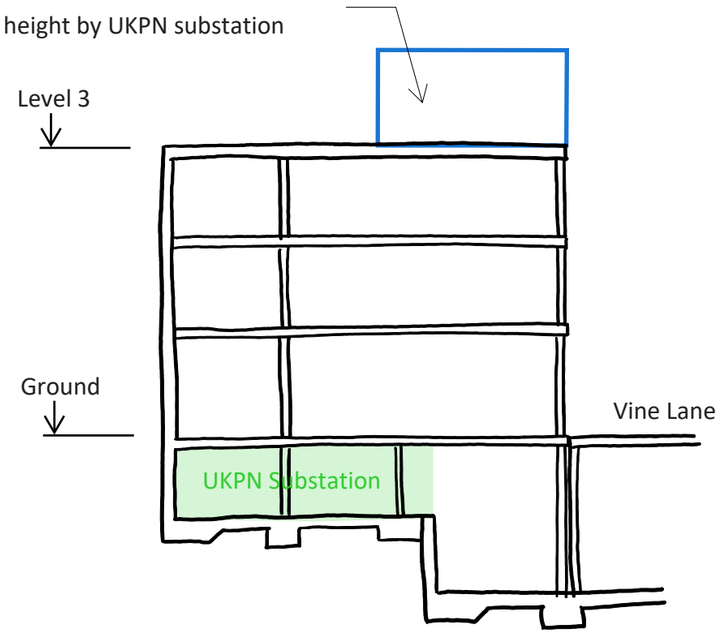
Notes:

+ Existing structure assumed to have capacity to support office loads of 0.85kN/m2 SIDL and 2.5 + 1.0kN/m2 LL which will need to be confirmed by intrusive investigations
+ Existing roof assumed to have 100mm screed finishes
+ All options ensure no increase in load at B1 level
+ No plant or blue/green roof above retained section
+ All options require lightweight facades

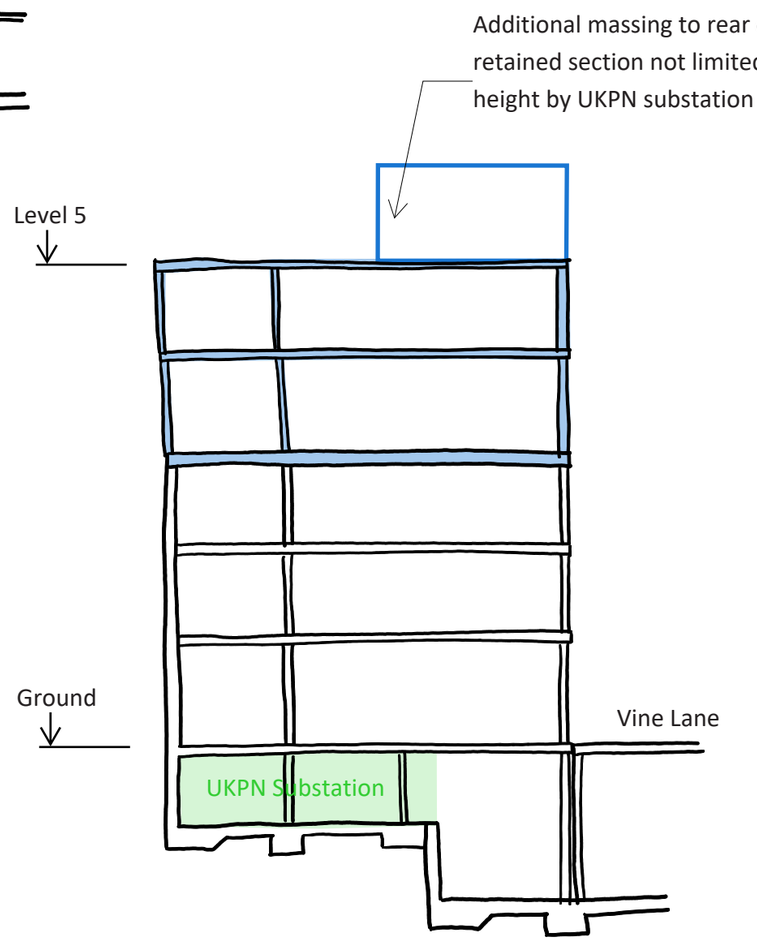


Existing Long Section



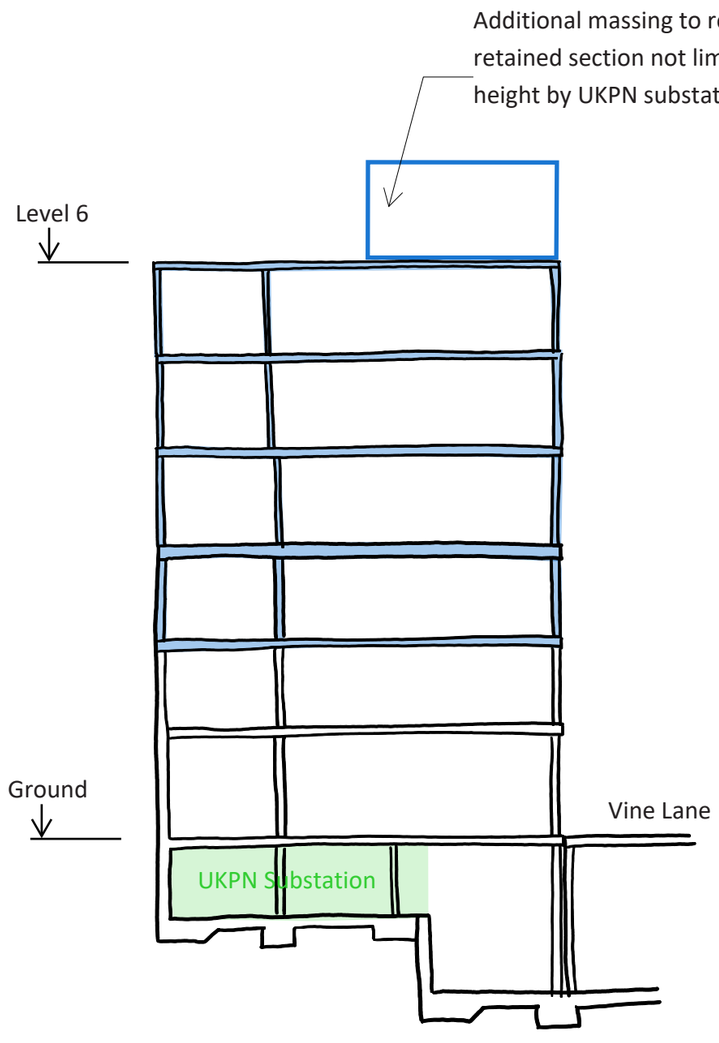
Option 1

+ No increase in massing above retained section



Option 2

+ Existing roof demolished
+ New lightweight 2-storey extension
+ Possible column strengthening required



Option 3

+ Existing roof and second floor slab demolished
+ New lightweight 4-storey extension
+ Possible column strengthening required

Residential Options

Job	Museum Street		Date 05.11.2023
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HEYNE TILLETT STEEL