


125 Shaftesbury Avenue

Town Planning Statement

Prepared by Gerald Eve LLP

Submitted on behalf of VREF Shaftesbury SCS

November 2024



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1 Executive Summary

- 1.1 This Town Planning Statement provides a comprehensive review of relevant national, regional and local planning policies in relation to the development proposals at 125 Shaftesbury Avenue (the 'Proposed Development'). It sets out the town planning justification for the Proposed Development and contains a detailed assessment in relation to relevant development plan policies and other material planning considerations.
- 1.1 Edge and Mitsubishi Estate London Limited (VREF Shaftesbury SCS), herein referred to as 'The Applicant' are the freehold owners of 125 Shaftesbury Avenue ('The Site') and are seeking to bring forward exciting proposals to reimagine the building and surrounding public realm. Their aim is to always build the best, most sustainable and innovative building of its time.
- 1.2 The existing building comprises a basement, ground plus ten upper storeys building which has been primarily used as offices (Class E) since its construction. The existing building was constructed in the early 1980's. As such, the existing office accommodation is outdated and does not suit modern occupier requirements. The floorplates and core configuration are inefficient, and the space planning is irregular which does not suit modules for modern tenancies and occupation. Likewise, the existing floor to floor heights are restrictive and the existing building services are outdated.
- 1.3 The Proposed Development seeks planning permission for the:
- “Remodelling, refurbishment and extension of the existing building to provide Use Class E commercial and retail space, amenity terraces, a new public route, relocated entrances, cycle parking, servicing and rooftop plant along with associated highway, landscaping and public realm improvements and other associated works.”**
- 1.4 The existing building contributes poorly to the existing urban character, has a poor relationship to the surrounding public realm and has a confused urban legibility. The façade of the existing building has significantly deteriorated, delivering poor environmental performance, and needs remedial work.
- 1.5 The neglected appearance of the existing building detracts from the public realm, the adjacent Seven Dials (Covent Garden) Conservation Area and Denmark Street Conservation

Area and adjacent listed buildings and views around The Site. The Site sits in a location between the distinct, characterful and important areas of Soho, Covent Garden, Seven Dials and Bloomsbury, fronting two key arterial routes of Shaftesbury Avenue and Charing Cross Road. The Site has the potential to help stitch these distinct areas of Central London together in the urban fabric.

1.6 The Development Proposals have evolved around an opportunity to significantly upgrade this building, reflecting the London Borough of Camden's (LBC) 'We Make Camden' policy objectives as set out below:

- Every child has the best start in life;
- Camden's local economy should be strong, sustainable, and inclusive – everyone should have a secure livelihood to support them to live a prosperous life;
- Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute;
- Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well, and age well;
- Everyone in Camden should have a place they call home; and
- Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency.

1.7 The proposals have also evolved around taking advantage of the building's many strengths, namely its highly accessible Central London location, including proximity to the new Crossrail station at Tottenham Court Road, unique characteristics, the mix of building styles and heights in the area, and the potential to create strong pedestrian links through to the surrounding districts.

1.8 The Development Proposals would deliver a highly sustainable mixed-use development, including additional commercial, office and retail floorspace, active frontages at ground floor level and an improved public realm, as well as re-establishing a pedestrian route through the Site. Whilst the Development Proposals result in a reduction in overall commercial, retail floorspace, much of the existing commercial, retail floorspace is unusable as it is located at basement level, occupied by plant and used for back of house or storage facilities. The

proposed commercial, retail floorspace would consolidate the existing provision to create significantly higher quality retail units and to deliver an increased length (m) of activated frontages at the Site, meeting modern retail occupier requirements and activating the street frontage at the Site.

- 1.9 In this context it is considered that the Proposed Development will make a significant contribution to both Camden and to London by improving the dysfunctional lack of connectivity between Soho, Covent Garden, Seven Dials and Bloomsbury through the creation of a place of character with improved movement and connections between people and places.
- 1.10 The problem of drugs, crime and homelessness in this area are well known. A key success of these Development Proposals would be the ability to significantly reduce these unwanted activities and create a safer, more pleasant area to live, work and visit.
- 1.11 It is envisaged that the proposed public realm works would improve the street environment, both for those living and those working in the area, by both creating and offering more attractive places to spend time, and for those travelling through and by making the area more legible, safer and visually attractive whilst providing an urban environment that is distinctive and safe.
- 1.12 This Statement, alongside the full suite of submitted application documents, demonstrates the Proposed Development would deliver a wide ranging and significant package of public benefits. This pack includes:

Environmental

- Target circa 75% structural retention;
- On-floor air handling units (AHUs) and heat pump-led 100% electric HVAC systems facilitating long-term operational decarbonisation;
- Provision of photovoltaic panels at roof level (c. 150 sq m);

- Fabric-first low-energy design and façade development, including perimeter gains targets and mitigation of overheating;
- Delivering improved permeability across The Site and new connections to the neighbourhoods and communities in the immediately surrounding area. Create greater permeability and safe pedestrian routes through the development, that will increase walkability in the area, including the re-establishment of Little Compton Street and the reduction of anti-social behaviour;
- Greening of The Site and the public realm, increasing access to nature for users, visitors and passers-by. Targeting UGF of 0.25 and BNG of >10%;
- Basement stormwater runoff storage design for 1-in-100 event including 40% climate change and greywater harvesting systems included to reduce potable water consumption combined with low-flow fittings and climate resilient planting;
- Provision of cycle and runner-commuter facilities to encourage sustainable transport options such as cycling and walking/running to reduce pollution from transport;
- The project would be assessed against the Building Research Establishment Environmental Assessment Method (BREEAM), which would target a minimum rating of Excellent, representing the top 10% of UK new buildings in terms of sustainability. The project seeks to explore opportunities to move towards the highest ratings level, Outstanding;
- Climate change mitigation is a priority for the project, and the building has been designed to minimise ‘whole-life’ carbon emissions – both in construction and in operation. The building has been designed to target reduction in operational carbon emissions by 27% in comparison to the requirements of Building Regulations Part L, and would be all-electric in normal operation, with no fossil fuel combustion on site for space heating or hot water;

- Embodied carbon –The project team are committed to undertaking full life cycle analysis of the project, taking into account the existing building, and using the outcome of the modelling to reduce embodied carbon impacts at each stage;
- The project seeks to divert at least 95% of construction waste from landfill and will seek to retain waste at its highest level of utility, favouring re-use over recycling wherever feasible. A full pre-demolition audit will be completed prior to strip out and demolition, to identify opportunities for reuse and recycling of existing material, either on or off site. Materials Index are engaged to provide the pre demolition audit and help facilitate key elements for harvesting ahead of the soft strip contract period;
- Increase biodiversity through generous terraces at multiple levels and new public realm at ground level;
- Provision of external amenity terraces at each level with planting and creation of a planted, terraced internal atrium to bring light and green into the building;
- Creation of two new publicly accessible spaces – one on Caxton Walk and one on Stacey Street adjacent to The Phoenix Garden, creating a safer, well-lit environment to address existing anti-social behaviour; and
- Transport improvements including exploring the pedestrianisation of Phoenix Street and circulation amendments to Stacey Street to further reduce traffic speed and improve road safety.

Social

- Re-establishment of historic street, reconnecting Old to New Compton Street;
- Provision of high-quality affordable workspace space at ground floor level targeting the theatre industry in the first instance, overlooking and complementing The Phoenix Garden and the new public realm to be created on this part of The Site.

- Meanwhile uses, including partnership with Bow Arts who are occupying part of the building as affordable art studios for local artists and a significant part of the building has been leased to Raise Your Hands who will be creating an immersive theatre within the building;
- Potential to work with Redemption Roasters or Sign Language Coffee Bar or similar to run a future coffee shop within the building;
- Improvement to the public realm, delivering increased safety features to deter anti-social behaviour and activating the street frontages, creating vibrancy and vitality at The Site;
- Encouragement of conviviality and promotion of interaction and integration of tenants through generous shared building amenities;
- Delivering high quality design that responds to and respects the differing characteristics of the facades across The Site and that addresses its sensitive location next door to heritage assets (Phoenix Theatre and former Saville Theatre); and
- Enhancing the setting of Cambridge Circus through a building that responds to the formal qualities of this urban 'set piece'.

Economic

- The creation of a significant number of jobs, including approximately 225 during the construction phase first targeted at Camden residents and then via Central London Forward;
- Approximately £450,000,000 GVA per year through direct and indirect impact during the operation phase including £327,000,000 spent per year within Camden;
- An estimated 3,248 full time jobs throughout London including 2,165 direct on-site jobs in Camden and 1,083 indirect jobs supported across London;

- Affordable workspace provision at ground floor level overlooking the new public realm and route through The Site;
- Provision of work placements and apprenticeships during the construction period;
- At this stage, The Applicant does not know who the future tenants would be. However, The Applicant is committed to encouraging future tenants to engage with Camden's employment team when jobs arise;
- Delivery of increased and improved flexible office floorspace in a location where planning policy and objectives support and promote the land use;
- Target local recruitment through KXCSC, and Good Work Camden; and
- Maximise the opportunities for local businesses to supply goods and services at the construction phase.

2 Introduction

- 2.1 This Town Planning Statement ('this Statement'), prepared by Gerald Eve LLP, is submitted in support of a detailed planning application made on behalf of VREF Shaftesbury SCS ('The Applicant') to support an application for planning permission in respect of its proposals at 125 Shaftesbury Avenue ('The Site').
- 2.2 The planning application has been brought forward following extensive consultation with the local community and interest groups and thorough pre-application discussions with planning, design, conservation, inclusive economy, sustainability and transport officers at the London Borough of Camden ('LBC').
- 2.3 This Statement sets out the town planning case in support of the application. It provides an overview of The Site and surroundings, the planning history and assesses the Proposed Development in the context of national, regional and local planning policy and guidance.
- 2.4 This Statement identifies national, strategic, and local planning policy and guidance relevant to the application and assesses the degree to which the application accords with the statutory development plan. This Statement also identifies other material considerations relevant in determining the applications, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 2.5 The Development Proposals are described in greater detail in the Development Proposals section of this Statement. In summary, planning permission is sought for:

“Remodelling, refurbishment and extension of the existing building to provide Use Class E commercial and retail space, amenity terraces, a new public route, relocated entrances, cycle parking, servicing and rooftop plant along with associated highway, landscaping and public realm improvements and other associated works.”

- 2.6 This Statement is structured as follows:

- Section 3 – Description of The Site and Surroundings;

- Section 4 – Details of The Site’s Background and Planning History;
- Section 5 – Details of the Development Proposals;
- Section 6 – Details of the Consultation on the Proposals;
- Section 7 – Relevant Planning Policy Framework;
- Sections 8-15 – Consideration of the Material Planning Considerations arising from the Development Proposals;
- Section 16 – Planning Obligations; and
- Section 17 – Summary and Conclusions.

2.7 The proposed works are designed by DSDHA and are described in Section 5 of this Statement as well as in the submitted Design and Access Statement. This Statement should be read in conjunction with the plans and drawings submitted, as well as the following documents which are submitted in support of this application:

- Design and Access Statement, prepared by DSDHA;
- Application Form;
- Covering Letter, prepared by Gerald Eve LLP;
- Community Infrastructure Levy (CIL) Form;
- Noise Impact Assessment Report, prepared by Hann Tucker;
- Air Quality Assessment & Air Quality Neutral Assessment, prepared by TetraTech;
- Arboricultural Impact Assessment, prepared by Tree: Fabrik;

- Archaeological Assessment, prepared by MOLA;
- Preliminary Environmental Risk Assessment, prepared by SWECO;
- Preliminary Ecological Appraisal / Ecology Study, prepared by SWECO;
- Biodiversity Report/ BNG, prepared by Greengage;
- Circular Economy and Materials prepared by SWECO;
- Whole Life Carbon Assessment (replacing embodied energy assessment), prepared by SWECO;
- BREEAM Pre-Assessment Report/ Operational Energy Statement, prepared by SWECO;
- Sustainability Statement (inc. Energy), prepared by SWECO;
- Energy Statement, prepared by SWECO;
- Overheating Strategy, prepared by SWECO;
- Financial Viability Assessment, prepared by Gerald Eve LLP;
- Housing Study, prepared by DSDHA;
- Regeneration Statement, prepared by ekosgen;
- Employment and Skills Strategy, prepared by ekosgen;
- Daylight & Sunlight Assessment, prepared by Gordon Ingram Associates;
- Fire Statement, prepared by The Fire Surgery;

- Townscape Views & Heritage Statement, prepared by The Townscape Consultancy;
- Historic Environmental Desk-Based Assessment prepared by The Townscape Consultancy;
- Public Realm, prepared by DSDHA;
- Landscape Design and Access Statement, prepared by DSDHA;
- Health Impact Assessment, prepared by ekosgen;
- Statement of Community Involvement, prepared by Kanda Consulting;
- Draft Construction Management Plan (following Camden Pro-Forma), prepared by Waterman;
- Transport Assessment (Healthy Streets) + Active Travel Zone Assessment, prepared by Waterman;
- Delivery and Servicing Strategy and Waste Management, prepared by Waterman;
- Draft Framework Travel Plan, prepared by Waterman;
- Draft Construction Logistics Plan, prepared by Waterman;
- Operational Waste Management Strategy, prepared by Waterman;
- Pre-demolition audit (full demo), prepared by Blackburn;
- Security Needs Assessment, prepared by QCIC; and
- Structural Investigations Scope/ Structural Methodology Statement, prepared by AKT II.

3 Site and Surrounding Area

3.1 This chapter describes the Site's location and surrounding context.

The Site

3.2 The Site is in the London Borough of Camden. The existing building fronts on to four streets: Shaftesbury Avenue, Charing Cross Road, Phoenix Street and Stacey Street. Both Shaftesbury Avenue and Charing Cross Road are busy traffic routes through the area, whilst Stacey Street and Phoenix Street are quieter pedestrian routes from Soho to St Giles.

3.3 The existing building comprises a basement level and ground plus ten upper storeys 1980's building which has been used primarily as offices (Class E) since its construction.

3.4 The Site is between, but not associated with, very distinct character areas of London including St Giles, Soho, Covent Garden and Holborn. The Site lacks identity and it is considered that the Proposed Development would assist with creating linkages and stitching the building into its wider context.

3.5 The London Plan (2021) identifies the Site within the Central Activities Zone (CAZ). The strategic priorities of the CAZ are to enhance and promote the unique international, national and London wide roles of the CAZ, supporting distinct offer of the Zone based on a rich mix of local as well as strategic uses and forming the globally iconic core of one of the world's most attractive and competitive business locations. The CAZ is also required to sustain and enhance the distinctive environment and heritage of the CAZ, in appropriate parts ensure that office provision is not strategically constrained and provision is made for a range of occupiers, support and improve the retail offer of the CAZ and sustain and manage the attractions of the CAZ as a leading visitor destination.

3.6 The Site is also identified as being within an arts, cultural or entertainment character area. In this area, development capacity should be brought forward which supports infrastructure and services to sustain and enhance this role.

- 3.7 The Site is not located within any protected views or viewing corridors within the London View Management Framework (2012).
- 3.8 Within the adopted Camden Local Development Framework (LDF), the Site is within an Archaeological Priority Area, Central London Location and part of the Site is also located within the Tottenham Court Road Central London Frontage. The Site is not within a Conservation Area but adjoins LBC Seven Dials (Covent Garden) Conservation Area and Denmark Street Conservation Area.
- 3.9 The Seven Dials (Covent Garden) Conservation Area lies to the southeast of The Site. The special character of the Conservation Area is found in the range and mix of building types and uses and the street layout. The character is not dominated by one particular period or style of building but rather it is their combination that is of special interest. This is stated within the Seven Dials (Covent Garden) Conservation Area Statement.
- 3.10 The Denmark Street Conservation Area lies to the northeast of the Site and was designated as an extension to the Bloomsbury Conservation Area in 1984. An extension was designated in 1991 and a further extension in 1998.
- 3.11 The Site is not listed. The disused Odeon cinema, directly to the north of the building along Shaftesbury Avenue, is Listed Grade II and the Phoenix Theatre to the northwest is Listed Grade II. Other surrounding listed buildings include St Giles-in-the-Fields Church to the north, which is Listed Grade I and the Palace Theatre to south which is Listed Grade II*.
- 3.12 The Site has an excellent public transport accessibility level with the highest possible rating of PTAL 6b.
- 3.13 The Site forms an island with Trentishoe Mansions to the south as the two buildings are situated between two main roads: Shaftesbury Avenue and Charing Cross Road.
- 3.14 Camden are consulting on a new Local Plan. Once the emerging new Local Plan is adopted, the Policies Map will be updated which may result in the Site falling under different designations.

Surrounding Area

- 3.15 The area around the Site is densely built up, so the upper parts of the existing building are visible from few locations in the wider area. Buildings surrounding The Site are mixed in scale, ranging from lower rise buildings such as St Giles Church, and late 19th century office and institutional buildings on the south side of Shaftesbury Avenue of a consistent scale of 4 and 5 storey, to taller buildings further north up Charing Cross Road, towards Tottenham Court Road, including Centrepoint and Central Saint Giles.
- 3.16 The surrounding properties are a mix of uses, including commercial (Class E), residential (Class C3) to the rear of The Site on Phoenix Street and to the south in Trentishoe Mansion, as well as some retail (Class E) and restaurant (Class E) at ground floor level. There are also a number of cultural uses in the area, with Phoenix Theatre (Listed Grade II) adjacent and Palace Theatre (Listed Grade II*) to the south, of The Site.
- 3.17 This Site's immediately surrounding area is also undergoing considerable change, for example there is a pending planning application (ref. 2024/0993/P) for part demolition, restoration and refurbishment of a Grade II listed building with a six-storey roof extension proposed, on top of an existing six storey building in respect of the site at the former Odeon Cinema at 135-149 Shaftesbury Avenue.
- 3.18 There is also a pending planning application (ref: 2024/2450/P) at 151 Shaftesbury Avenue for the refurbishment of existing building, demolition of existing rooftop and replacement with two new setback floors, partial infill extensions to rear of building at floors 5-8, replacement of existing facades and retention of existing Class E floorspace.

4 Planning History

4.1 This Chapter outlines the Site's relevant planning history. A full planning history table is attached at Appendix A.

4.2 On 22 May 2018, planning permission was granted (ref. 2016/5202/P) for the:

“Remodelling, refurbishment and extension of existing office building (Class B1) at upper floor levels, roof level and within lightwells to provide 9,682sqm additional floorspace, including terraces, a new public route, a relocated office entrance (Charing Cross Road), rooftop plant and flexible retail uses (Classes A1/A3), along with associated highway, landscaping and public realm improvements.”

4.3 On 14 March 2002, planning permission was granted (ref. PSX0204122) for the refurbishment of the existing ground floor offices including the provision of full height glazing and a stainless-steel canopy.

4.4 On 21 May 1986, planning permission was granted (ref. 8600609) for use of part of the building as a dry cleaner.

4.5 On 3 May 1978, planning permission was granted (ref. P13/36X/A/26208) for the development of The Site bounded by Charing Cross Road, Phoenix Street, Stacey Street and New Compton Street and The Site bounded by New Compton Street, Stacey Street, Shaftesbury Avenue, 123 Shaftesbury Avenue and 5 New Compton Street by the erection of a basement and ten storey building for use as shops, showrooms, restaurant and offices together with associated car parking.

4.6 We understand that this planning permission (ref. P13/36X/A/26208) was implemented and is the planning permission relating to the existing building on The Site.

Temporary Planning Permissions

4.7 Temporary use applications related to the Site have also been submitted by the Applicant to ensure that the Site is activated and contributing to the character and function of its location,

whilst longer-term development plans are considered. Most notably, there is a current temporary planning permission (ref. 2024/1444/P) in place for the:

“Use of the existing ground floor entrance, first to fourth floors and ninth floor of 125 Shaftesbury Avenue as immersive theatre space, and ancillary events space (sui generis) for a temporary period between 1 September 2024 to 30 September 2025.”

- 4.8 This meanwhile use ensures that activity is delivered to the Site and its surrounding area, as well as contributing to its Central London function, whilst longer term development proposals for the Site are developed and brought forward.

Surrounding Area Relevant Planning History

- 4.9 The Site’s immediately surrounding area has been subject to significant investment and change in recent years. We have set out two planning applications submitted at sites in the Site’s immediately surrounding area which exemplify the recent investment and change being experienced at this location.

- 4.10 There is a pending application (ref. 2024/0993/P) for The Site at 135-149 Shaftesbury Avenue for the following:

“Part demolition, restoration and refurbishment of the existing Grade II listed building, roof extension, and excavation of basement space, to provide a theatre at lower levels, with ancillary restaurant / bar space (Sui Generis) at ground floor level; and hotel (Class C1) at upper levels; provision of ancillary cycle parking, servicing and rooftop plant, and other associated works.”

- 4.11 There is another pending application (ref. 2024/2450/P) for The Site at 151 Shaftesbury Avenue for the following:

“Refurbishment of existing building; demolition of existing rooftop plant level and replacement with two new setback floors at levels 8-9 (Class E(g)(i)); partial infill extensions to rear of building at levels 5-8; partial change of use at ground and lower ground floor level for use as either bar/drinking establishment (Sui Generis) and/or Commercial, Business &

Service uses (Class E); retention of existing Commercial, Business & Service (Class E) floorspace elsewhere in the building; replacement of existing facades and provision of cycle parking and associated end of trip facilities at lower ground floor level.”

5 Development Proposals

5.1 This Chapter sets out the key aspects of the Development Proposals.

5.2 The application seeks full planning permission for the:

“Remodelling, refurbishment and extension of the existing building to provide Use Class E commercial and retail space, amenity terraces, a new public route, relocated entrances, cycle parking, servicing and rooftop plant along with associated highway, landscaping and public realm improvements and other associated works.”

5.3 Planning Permission was previously granted for a similar scheme in 2018 (ref: 2016/5202/P). The Applicant bought the building in 2023 and has been working on proposals to enhance the previous approval by retaining more of the existing building and improving the sustainability credentials.

5.4 The proposals have evolved around an opportunity to significantly upgrade this building, reflecting Camden’s key policy objectives, as summarised at paragraph 1.6 of this Statement, and taking advantage of the building’s many strengths, namely its highly accessible Central London location, including proximity to the new Crossrail station at Tottenham Court Road, unique characteristics, the mix of building styles and heights in the area, and the potential to create strong pedestrian links through to the surrounding districts. The proposals result in a highly sustainable commercial development, providing active frontages at ground floor and improving the public realm, as well as providing a new route through The Site.

5.5 The Proposed Development has evolved in response to feedback from Officers at London Borough of Camden (LBC), Frame Projects (FP) who run Camden Council’s Design Review Panel and extensive consultation with local groups, stakeholders and residents.

5.6 A full description of the proposals is contained in the Design and Access Statement prepared by DSDHA. This Town Planning Statement should be read in conjunction with the Design and Access Statement and other technical assessments together with the formal plans and drawings submitted with the applications. The key details of the proposals are summarised in this section.

5.7 A summary of the existing and proposed land use components is set out in Table 1 below:

Table 1 – Land Use Summary

Land Use	Existing floor area (sqm GIA)	Proposed floor area (sqm GIA)	Net Change (sqm GIA)
Commercial, Office (Class E)	18,113	32,435	+14,322
Retail and Restaurant (Class E) including Dry Cleaners (Sui Generis)	4,750	862	-3,888
TOTAL	22,863	33,297	+10,434

5.8 The Proposed Development would see the retention, recladding and refurbishment of the lower floors of the building. The existing set back upper floors would be removed and reconstructed. The upper floors of the building would be for commercial, office use (Class E).

5.9 In addition, affordable workspace is proposed at the ground floor overlooking the upgraded public realm along Stacey Street. The affordable workspace will be targeted at the theatre industry in the first instance.

Active ground floor

5.10 The ground floor would be animated with 862 sqm of retail, with shops characteristic of the area, in addition to the enhanced commercial, office lobby fronting on to Charing Cross Road.

The proposed retail floorspace would be consolidated to create significantly higher quality retail units, meeting modern retail occupier requirements.

Amenity Spaces

- 5.11 Terraces would be provided on each level to enhance occupants' wellbeing and create a softer, green building form.

Public Realm enhancements

- 5.12 The proposals would deliver improved permeability across The Site and new connections to the neighbourhoods and communities in the immediately surrounding area. The new pedestrian route will re-establish Little Compton Street, increase walkability in the area and will contribute towards the reduction of anti-social behaviour.

Design concept

- 5.13 The overall concept for the design of The Site, through an extensive retrofit and extension of the existing building, is to create a high-quality, low carbon, mixed-used scheme that is both historically and environmentally responsive.
- 5.14 One of the key concepts is to deliver a viable, clear and welcoming pedestrian route through the building to re-link New and Old Compton Street whilst enhancing the appearance of the building to respond to its surroundings in a more appropriate manner and encourage biodiversity through planted amenity terraces and open spaces.

Materiality

- 5.15 The proposed building has been designed to have regard to its local context and its wider setting. Each elevation of the building has a slightly different appearance through variations in composition and articulation of the facade, whilst a unified and restricted material palette ensures that the scheme can be understood as a coherent whole.

5.16 The proposal offers a lighter palette of materials, comprising natural stone and pre-cast elements combined with refined metal detailing and brick façade on the St Giles’s side.

Biodiversity Net Gain (BNG)

5.17 Given the site does not possess >25m² of semi-natural habitat, it is exempt from legislative BNG requirements. In any case, the Proposed Development will deliver a minimum of 10% BNG.

Urban Greening Factor (UGF)

5.18 The UGF score is 0.25. Details of the calculation are set out on page 154 of the DAS.

Cycle Parking

5.19 Extensive cycle parking is proposed in the development. Table 2 below sets out the proposed quantum of bicycle spaces:

Table 2: Proposed cycle parking spaces

	Long Stay	Short Stay
Class E commercial	452	16
Class E retail	16	16
Total	468	32

5.20 The proposed cycle parking facility would be split over two separate stores in the basement of 125 Shaftesbury Avenue accessed via a Dutch style stair ramp from Phoenix Street and a London Cycling Design Standards (LCDS) compliant cycle lift to provide access for larger and adapted cycles. These comprise the following:

- 365 standard two-tier parking (83%)
- 44 foldable bicycle parking (12%)

- 6 cycle parking spaces for Affordable Workspace
- 22 non-standard / large / adapted cycle parking (5%)

5.21 In addition, 430 lockers and 43 showers would be provided for the commercial, office users. 22 lockers and 2 showers would be provided for the retail users of the building.

5.22 All commercial, office servicing and all refuse collection will take place from a new service yard entrance accessed directly from Stacey Street to the south of the New Compton Street junction and the new pedestrian walkway.

Circular Economy

5.23 The Proposed Development incorporates a range of Circular Economy principles relating to the retention of the existing building, and the reuse, recycling and upcycling of materials from deconstruction.

5.24 The Applicant has engaged Materials Index to proactively manage the reuse, recycling and upcycling of materials from deconstruction.

5.25 The targeted principles include:

- 95% of demolition, excavation and construction materials will be diverted from landfill;
- 90% of materials will be reused or recycled from demolition and strip out; and
- 30% disassembly potential with reuse at end-of-life.

Energy and Sustainability

5.26 The Proposed Development achieves an overall reduction in regulated carbon dioxide emissions by 27% over Part L 2021, with a carbon offset payment proposed to offset the shortfall.

5.27 The Proposed Development includes a range of sustainability strategies and approaches which are summarised below:

- Energy Performance: targeting a Building Regulation Energy Performance Certificate (EPC) rating of A.
- Flexibility and Adaptability: The design allows for future flexibility, with a reduction in concrete structural walls enabling adaptable cores and opportunities for openable vents and windows, enhancing mixed-mode ventilation.
- BREEAM Certification: the scheme is targeting a minimum BREEAM rating of 'Excellent', with aspirations for 'Outstanding'.
- WELL Building Standard: the design incorporates the key principles of the WELL Building Standard to promote occupant health and well-being, aiming for a WELL Platinum certification.
- Drainage Strategy: the design includes a basement stormwater storage solution designed for a 1-in-100-year event, with a +40% allowance for climate change.
- Greywater Recycling: the design will implement greywater recycling systems.
- Urban Greening and Biodiversity: the scheme will target 0.25 UGF and a Biodiversity Net Gain minimum of 10%, achieved through generous terraces at multiple levels and a new public realm at ground level, with input from specialist ecologists.

Housing

- 5.28 The approved 2018 scheme demonstrated that the provision of housing on site was not possible. A further Housing Study, prepared by DSDHA, was undertaken at the pre-application stage of this proposal to demonstrate the same outcome.
- 5.29 Camden planning officers have reviewed this report as part of the pre-application engagement and confirm that a Payment in Lieu would be secured via Section 106 legal agreement towards the delivery of affordable housing by the Council, on a Council owned site.

6 Pre-Application Engagement and Consultation

- 6.1 In respect of pre-application engagement, Paragraph 39 of the NPPF confirms that “early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.”

Policy Context

- 6.2 LBC adopted a Statement of Community Involvement (‘SCI’) in 2006 and this was last revised in 2011. The SCI sets out how LBC will involve local people, local businesses and other key organisations and stakeholders when they prepare planning policies and consider planning applications.

- 6.3 Paragraphs 39-46 of the NPPF highlights the importance of pre-application engagement and front loading; early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves outcomes for the community.

Consultation Strategy

- 6.4 A Statement of Community Involvement (SCI), prepared by Kanda has been submitted with this application.

- 6.5 The SCI confirms that the Development Proposals have been subject to extensive consultation over the course of 2024. Those consulted include:

- London Borough of Camden (Planning, Design, Transport, Inclusive Economy, Sustainability);
- Frame who manages Camden Council’s Design Review Panel;

- Yoo Capital, owners of the Saville Theatre;
- The Phoenix Garden;
- Phoenix Theatre and residents adjacent to the theatre;
- Ward Councillors for Holborn & Covent Garden
- Trentishoe Mansions Residents' Association;
- Covent Garden Community Association;
- St Giles in the Field's Church;
- Central District Alliance;
- Covent Garden Dragon Hall Trust; and
- Cambridge Circus Ltd.

6.6 The proposals have evolved over the consultation period and have sought to accommodate, where possible, comments made during these consultations.

6.7 Comments received referred to the proposed height, bulk and design of the proposed building, land uses, public realm and open space, daylight and sunlight and potential Section 106 obligations.

6.8 Full details are set out in the Statement of Community Involvement, prepared by Kanda.

LBC Pre-Application Meetings

6.9 Extensive pre-application meetings have been held with planning and design officers from LBC since March 2024. Additional technical meetings to discuss transportation,

sustainability, sunlight and daylight, housing, noise and public realm have also taken place at the pre-application stage with relevant officers of LBC.

6.10 Feedback received at the meetings has been taken on board within the submitted application proposals.

Consultation with Residents, Neighbours and Other Stakeholders

6.11 As set out in detail in the submitted SCI, Kanda, the Communications Consultant, has carried out the following consultation on the Proposed Development:

- Sent letters to 1526 addresses;
- 155 unique visits to the consultation website¹ from launch 4th July – 29th August 2024;
- Meetings held with local stakeholders and neighbouring businesses; and
- Two public exhibitions held, one on 11th July and another on 13th July 2024. There were 10 attendees across the two events. Additionally, on Thursday 11th July prior to and during the event, two members of Kanda undertook door-knocking of residential buildings in the local area. In total, the team visited 84 addresses and held 20 conversations.

Consultation with Phoenix Theatre

6.12 A meeting was held between The Applicant, Kanda and Phoenix Theatre on the 22nd of September 2024.

6.13 The Phoenix Theatre is supportive of LBC's Safe and Healthy Streets consultation proposals in respect of the Shaftesbury Avenue Area for street improvements. It is

particularly excited about the opportunities for them for making more use of Phoenix Street for outdoor refreshments and queuing.

- 6.14 The theatre's main concern was ensuring that they can get occasional access consent from Camden to enable articulated lorries to turn into and back out of Stacey Street from Shaftesbury Avenue.

Consultation with The Phoenix Garden

- 6.15 On 15 May 2024, a meeting was held between The Phoenix Garden, The Applicant and Kanda. The manager of The Phoenix Garden noted some concerns about the small impact on daylight and sunlight to the garden.

- 6.16 It was also noted that The Phoenix Garden are happy for the proposed route through The Site to not be gated if there was improved security, CCTV and good lighting, all of which are proposed. The Phoenix Garden also shared that they were supportive of flattening the rear of the building along Phoenix Street to create new public realm and to minimise anti-social behaviour.

- 6.17 A second meeting was held on 23 October 2024 here the overshadowing analysis and proposed design information was shared and discussed.

Design Review Panel

- 6.18 The Applicant presented the Proposed Development at a Design Review Panel (DRP) on 20 September 2024. The formal feedback concluded that the Panel supports the proposals for 125 Shaftesbury Avenue, praising the reuse of the building and reinstatement of a public route but suggesting further design refinement to better fit its surroundings.

- 6.19 While comfortable with the additional two storeys proposed, they raised concerns about the additional building mass near St Giles-in-the-Fields churchyard and recommended a more playful, textured approach using recycled materials. The Panel advised removing the column to improve the pedestrian route and enhancing light and height in the space. The Panel also encouraged attracting creative businesses as the operators of the building,

promoting community use in the retail space, and continuing to develop sustainability strategies.

6.20 After the DRP and further discussion with LBC officers, the following key design amendments were made to the proposed design:

- Materiality of Level 12 (the additional mass) was changed to further express the layering of the facades and provide a crown to the building;
- Along Stacey Street, feedback from the Panel resulted in a redesign to relate to the Charing Cross Road building façade. A cut out on Levels 08-11 between the crown and the clocktower has sought to reduce the impact of the massing and creates four distinct components; and
- At ground floor level, the proposed design responds to comments made by the DRP and design officers with the proposed pedestrian walkway facades. Furthermore, the reinstated walkway would take the pedestrian between two separate buildings as it did historically.

Summary

6.21 The consultation strategy has been extensive and has sought to engage with statutory and non-statutory consultees including residents, local businesses, community groups and ward councillors throughout the design process. The information provided during this process was full and comprehensive.

6.22 The proposals have been revised to reflect comments raised throughout the consultation, particularly in relation to the proposed building design and public realm works.

6.23 The Applicant is committed to continued engagement with neighbours and LBC throughout the application determination process and into the construction phase.

7 Planning Policy Framework and Legislation

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 7.2 Planning policy operates at national, regional, and local levels. At a national level, Government adopted the National Planning Policy Framework (NPPF) in March 2012. The latest updates to the document were published in December 2023.
- 7.3 The statutory development plan for The Site comprises at a regional level the London Plan (2021) and at the local level, LBC Local Plan (2017) and the Site Allocations Plan (2013). There is no adopted Neighbourhood Plan for this area.
- 7.4 The Council will use its Local Plan and Policies Map Documents, where relevant and up to date, together with the Mayor of London's adopted London Plan as the basis for determining planning application in the borough. In addition, to support the policies in these documents, more detailed planning guidance has been prepared. Camden has updated its supplementary planning documents to ensure that they are in line with the adopted Local Plan and Policies Map Documents.

National Planning Policy Framework (2023)

- 7.5 The (NPPF) sets out core planning principles that underpin both plan-making and decision taking. It is a material consideration in the determining of all planning applications.
- 7.6 The purpose of the planning system is to contribute to achieving sustainable development. The NPPF explains that the policies of the NPPF taken as a whole constitute what the Government considers sustainable development to mean in practice.
- 7.7 The presumption in favour of sustainable development is intended to ensure that the planning system focuses on opportunities for positive growth, making economic, environmental and social progress for current and future generations. The presumption, in practice, means that significant weight should be placed on the need to support economic growth through the planning system and local planning authorities should plan positively for

new development and approve all individual proposals wherever possible. However, development should not be allowed if it would undermine the key principles for sustainability in the NPPF. The NPPF makes clear that the policies should apply “unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits” (paragraph 11(b)(iii)).

7.8 Paragraph 11(c) and (d) of the NPPF go on state that in decision-taking, this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless (i) the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

7.9 NPPF paragraph 86(a) states that the planning policies should positively and proactively encourage sustainable economic growth.

Planning Practice Guidance, 2014 (as amended)

7.10 The Planning Practice Guidance was first produced and published by the Department of Communities and Local Government (‘DCLG’) in March 2014 to cover a range of topics which have been varied and supplemented on a number of occasions since.

The Statutory Development Plan

Regional Planning Policy

7.11 The London Plan (‘LP’) was published on 2 March 2021 and is the Spatial Development Strategy for Greater London, setting a framework for how London will develop over the next 20-25 years and the Mayor’s vision for Good Growth. The London Plan forms the London wide policy context within which the boroughs set their local planning policies and forms part of the Statutory Development Plan.

Local Planning Policy

7.12 At the local level, LBC's Local Plan (2017) was adopted by the Council on 3 July 2017. This, coupled with LBC's Site Allocations Plan (2013), forms the local tier of the Development Plan and is therefore central to planning decisions and the control of future developments in the Borough.

7.13 The following policies are considered relevant to the determination of this application:

- Policy G1 Delivery and location of growth;
- Policy H1 Maximising housing supply;
- Policy H2 Maximising the supply of self-contained housing from mixed-use schemes;
- Policy H4 Maximising the supply of affordable housing;
- Policy H5 Protecting and improving affordable housing;
- Policy H6 Housing choice and mix;
- Policy H7 Large and small homes;
- Policy C5 Safety and security;
- Policy C6 Access for all;
- Policy A1 Managing the impact of development;
- Policy A2 Open space;
- Policy A3 Biodiversity;
- Policy A4 Noise and vibration;

- Policy A5 Basements;
- Policy D1 Design;
- Policy D2 Heritage;
- Policy CC1 Climate change mitigation;
- Policy CC2 Adapting to climate change;
- Policy CC3 Water and flooding;
- Policy CC4 Air quality;
- Policy CC5 Waste;
- Policy T1 Prioritising walking, cycling and public transport;
- Policy T2 Parking and car-free development;
- Policy T3 Transport infrastructure; and
- Policy T4 Sustainable movement of goods and materials.

7.14 Other relevant LBC Supplementary and Design Guidance of relevance to this application includes:

- Camden Planning Guidance – Access for All (March 2019);
- Camden Planning Guidance – Air Quality (January 2021);
- Camden Planning Guidance – Amenity (January 2021);
- Camden Planning Guidance – Basements (January 2021);

- Camden Planning Guidance – Community Uses, Leisure and Pubs (January 2021);
- Camden Planning Guidance – Design (January 2021);
- Camden Planning Guidance – Developer Contributions (March 2019);
- Camden Planning Guidance – Employment Sites and Business Premises (January 2021);
- Camden Planning Guidance – Energy Efficiency and Adaptation (January 2021);
- Camden Planning Guidance – Public Open Space (January 2021);
- Camden Planning Guidance – Town Centres and Retail (January 2021);
- Camden Planning Guidance – Transport (January 2021);
- Camden Planning Guidance – Water and Flooding (March 2019).

7.15 The following GLA documents are also material considerations:

- Accessible London: Achieving an Inclusive Environment LPG (October 2014);
- Central Activities Zone LPG (March 2016);
- Optimising Site Capacity: A Design-Led Approach LPG (June 2023);
- Shaping Neighbourhoods: Play and Informal Recreation LPG (September 2012);
- Social Infrastructure LPG (May 2015);
- Urban Greening Factor LPG (February 2023);
- Circular Economy Statement LPG (March 2022);

- The Control of Dust and Emissions During Construction and Demolition LPG (July 2014);
- Whole Life-Cycle Carbon Assessments LPG (March 2022);
- ‘Be Seen’ Energy Monitoring LPG (September 2021);
- Air Quality Neutral / Positive LPG’s (February 2023);
- Energy Assessment Guidance LPG (June 2022);
- Sustainable Transport, Walking and Cycling LPG (November 2022);
- The Control of Dust and Emissions during Construction and Demolition (July 2014);
and
- Fire Safety Guidance (Draft 2022).

Emerging Local Plan

- 7.16 Between 2020 and 2022, LBC consulted on its Draft Site Allocations Local Plan. The plan identified several key development sites and areas across LBC, including the Knowledge Quarter (KQ).
- 7.17 The Council consulted on the Draft New Local Plan from 17 January to 13 March 2024. LBC is considering all the responses received and will publish an updated version of the Local Plan during spring 2025. It is considered that the emerging Local Plan should be given limited weight in decision making as an emerging plan, in accordance with paragraph 48 of the NPPF.

Site Specific Allocations

Adopted Policy

- 7.18 Within the LP, The Site is located in the CAZ. The LP notes that the CAZ contains a unique cluster of vitally important activities including central government offices, headquarters and

embassies, the largest concentration of London's financial and globally orientated business sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media. The LP identifies that the Mayor and boroughs should inter alia recognise that the CAZ is the heart of London's world city offer and promote and coordinate development so that together they provide a competitive, integrated and varied global business location.

- 7.19 The CAZ SPG states that over the period 2011 to 2036, the CAZ boroughs are projected to accommodate a further 460,000 jobs of which 58% are within the CAZ itself. The strategic functions of the CAZ and its unique character and heritage, are fundamental to London's status as a dynamic, exuberant and successful world city. Its continued success will ensure that business, visitors and investment continue to flow into the capital and support not just the economy of inner and outer London, but also the wider metropolitan area and the UK as a whole. The recognised strategic functions of the CAZ are set out in the CAZ SPG
- 7.20 Within LBC, the application site is in the Central London Area. The Site is also designated as an Archaeological Priority Area. Part of The Site also falls within Central London's Frontages.

Emerging policy

- 7.21 The KQ spans from Camden Town to Holborn and Covent Garden. The KQ is a thriving innovation district, with research organisations, high-growth companies, knowledge-intensive industries, and a significant academic base. Improving the quality of place and ensuring that the Knowledge Quarter Innovation District (KQID) continues to be recognised as a vibrant and distinctive place is fundamental to its success.
- 7.22 The Site falls within the South Camden area where LBC will continue to ensure that development coming forward in the area contributes to the area's continued success and London-wide role, while delivering social, economic and environmental benefits for Camden's residents, making the area a more habitable, climate resilient and inclusive place.

Further Statutory Planning Legislation

- 7.23 Given the Site's location near the Seven Dials (Covent Garden) Conservation Area, the Denmark Street Conservation Area and the presence of statutorily listed buildings nearby the

application Site, statutory legislation regarding the historic environment is relevant to this planning application.

- 7.24 Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require that when considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Key Planning Considerations

- 7.25 The key planning considerations associated with the Proposed Development are:

- a. Land Use;
- b. Design;
- c. Heritage, Townscape and Views;
- d. Environmental;
- e. Energy and Sustainability;
- f. Transport, Waste and Servicing;
- g. Amenity; and
- h. Any other material planning considerations.

- 7.26 In the following sections of this Statement, we address each of the key planning considerations noted above, in addition to other policy considerations, having regard to the Development Plan as a whole, and any wider material considerations.

8 Land Use

8.1 This section assesses the development proposals in terms of land use.

Principle of Redevelopment

National Planning Policy

8.2 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved. For the reasons set out within this chapter, the Proposed Development is considered to be in accordance with the key policies contained in the development plan and represents sustainable development.

Regional Planning Policy

8.3 Chapter 1 of the London Plan sets out how growth should be managed in the Capital to build strong and inclusive communities, making the best use of land, creating a healthy city, delivering the homes Londoners need, growing a good economy and increasing efficiency and resilience.

8.4 London Plan Objective GG1 encourages development to seek to ensure changes to the physical environment achieve an overall positive contribution to London.

8.5 Part C of London Plan Objective GG2 sets out that development should proactively explore the potential to intensify the use of land to support additional workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. London Plan Objective GG2(D) highlights that proposals should use a design-led approach to determine the optimum development capacity of The Site.

8.6 Part A of London Plan Policy D3 reiterates that all development must ensure the best use of land by following a design-led approach that optimises the best capacity of land by ensuring that development is of the most appropriate form and land use for The Site.

8.7 Part B of London Plan Policy D1 (London's form, character and capacity for growth) sets out steps for using a particular area's characteristics to establish the capacity for growth of different areas and

ensure that sites are developed to an optimum capacity that is responsive to The Site's context and supporting infrastructure.

- 8.8 LPG: Optimising Site Capacity: A Design-Led Approach (2023) seeks to build on Part B of London Plan Policy D1 and ensures placemaking is prioritised by capitalising on the insight and knowledge of local communities. This should involve meaningful and upfront engagement and collaboration with local communities, organisations and businesses, to ensure they have a greater say on the type of development in their local area at the plan-making stage.
- 8.9 The Site sits within the Central Activities Zone (CAZ) which covers London's geographic, economic and administrative core. The CAZ brings together the largest concentration of London's financial and globally oriented business services. London Plan Policies SD4 and SD5 support mixed-use development which will enhance and promote the unique international, national and London wide roles of the CAZ.

Local Planning Policy

- 8.10 Policy G1 (Delivery and Location of Growth) of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of The Site, providing a mix of uses in accessible parts of the Borough (including self-contained housing) to deliver 16,800 new homes, 695,000sqm of new commercial, office floorspace and 30,000 sqm of new retail floorspace by 2031. The Council anticipate the most significant growth to be delivered across the Borough, with Central London playing a key role in facilitating that growth.

Emerging Local Planning Policy

- 8.11 LBC Draft Local Plan Policy DS1 (Part A (iii)) (Delivering Healthy and Sustainable Development) advises that the Council will ensure that land is used efficiently, and that a development makes best use of its site.
- 8.12 LBC Draft New Local Plan Policy CC2 (Repurposing, Refurbishment and Re-use of Existing Buildings) states that LBC will seek to ensure that the repurposing, refurbishment and re-use of existing buildings is prioritised over demolition. Part E of draft Policy CC2 notes that the Council will only

permit proposals that involve the partial or substantial demolition of existing building/s, where it can be demonstrated that:

- The Applicant has comprehensively explored a range of alternative development options, informed by the condition and feasibility assessment, prior to considering full or partial demolition.
- The proposal constitutes the best use of The Site, when considered against alternative options involving the retention, repurposing, refurbishment and/or re-use of the existing buildings.

Assessment

- 8.13 The Site sits within the CAZ and the Knowledge Quarter Innovation District (KQID). Maintaining, protecting and promoting the development capacity of these areas is a central thread running through national, regional and local planning policy. Being located within the CAZ, the Major also seeks to promote and incentivise office and other CAZ strategic functions in this location. The Proposed Development is therefore in line with London Plan policies SD4 and SD5, and the Central Activities Zone SPG objectives.
- 8.14 Given The Site's central location it is ideally located for intensification to optimise the commercial use of The Site and enhance the physical environment, which in turn can make a positive economic, social and environmental contribution at a national, regional and local level in line with objectives set out in the NPPF and the London Plan.
- 8.15 The Site is within one of the most connected areas in London. It presents an ideal site to deliver the objectives set out in London Plan Objective GG2, which seeks to promote higher density development, particularly in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling.
- 8.16 In its current form, The Site does not make the best use of land. From a design perspective, it has poor connectivity at ground level and the upper floors have been vacant for some time.
- 8.17 The Site has capacity for growth, which is responsive to its context, in line with London Plan Policy D1. There is an opportunity to reimagine the building and the public realm within this central London

site. The Proposed Development would provide higher quality floorspace suitable for a range of occupiers, including affordable workspace, which would generate employment opportunities for local people in Camden and across London. In addition, the Proposed Development would include retail uses for local people to enjoy and benefit from in line with London Planning Guidance 'Optimising Site Capacity'.

- 8.18 Since coming into power, the new Government has made clear the economic imperative in redeveloping brownfield land to deliver sustained growth. The proposed amendments to the NPPF (July 2024) make it clear that the first port of call for development must be brownfield land (paragraph 1). To reinforce the importance of this, the Government proposes to amend paragraph 124c of the NPPF to add the following:

"c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be regarded as acceptable in principle, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land."

- 8.19 The Proposed Development would optimise brownfield land to deliver commercial floorspace suitable for the modern economy. It is considered that this is a benefit of the scheme which should be given substantial weight.
- 8.20 Overall, the Proposed Development presents an exciting opportunity to optimise this site within the CAZ and Knowledge Quarter, in line with London Plan Objectives GG2, GG5 together with Policies D3 and D1. The proposals are also consistent with objectives within LBC Local Plan Policies G1, and LBC Draft New Local Plan Policy DS1.

Commercial, Office floorspace (Class E)

National Planning Policy

- 8.21 The NPPF sets out the Government's commitment to securing economic growth and advises that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century, stating that: 'significant weight should be placed on the need to support economic growth and productivity, taking into account wider opportunities for development' (paragraph 85).

8.22 On the 8th of July 2024, Chancellor of the Exchequer Rachel Reeves gave a speech on what immediate action would be required to fix the foundations of the UK economy. In her speech, she stated that “sustained economic growth is the only route to the improved prosperity that this country needs and the living standards of working people.”

Regional Planning Policy

8.23 The Site is in the CAZ. The London Plan identifies The Site as a location where commercial use is supported. The LP recognises that the CAZ is the country’s most important strategic office location.

8.24 Policy SD5 of the London Plan recognises the CAZ as being at the heart of London’s world city offer and identifies a strategic priority to promote and provide a competitive, integrated and varied global business location. The policy also states that offices and other CAZ strategic functions are to be given greater weight relative to new residential development at this location in the CAZ.

8.25 Policy SD4 Part G seeks to promote and support the CAZ as a centre of excellence and specialist clusters, including functions of health, education and cultural activities.

8.26 Part A of Policy E1 outlines that improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision and mixed-use development.

8.27 Policy E8 sets out the wider sector growth opportunities and clusters across London and notes that a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector specific opportunities.

Local Planning Policy

8.28 At a local level, LBC Local Plan Policy E1 states that the Council will secure a successful and inclusive economy in LBC by creating the conditions for economic growth, harnessing the benefits for local residents and businesses. To do so the policy says the Council will, among others, support and promote the development of the KQ, direct office development to the Central London Area and

recognise the contribution of other employment uses including retail, education, health, markets, leisure and tourism.

- 8.29 Policy E2 (Employment Premises and Sites) of the Local Plan sets the policy context for the provision of new employment premises within LBC. More specifically, the policy states that LBC will consider a higher intensity redevelopment of sites that are considered suitable for continued business.
- 8.30 Paragraph 72 of LBC’s CPG: Employment Sites and Premises states that for developments where an increase of 1,000sqm GIA or more is proposed, floorspace for Small Medium Enterprise (SME) should also be provided.

Emerging Local Planning Policy

- 8.31 LBC Draft New Local Plan Policy S1 (South Camden) Part I notes that the CAZ will continue to be the main focus for employment development in Camden.
- 8.32 LBC Draft New Local Plan Policy IE1 (Growing a Successful and Inclusive Economy) sets out how the Council will secure as strong, diverse, sustainable and inclusive economy in Camden and maximise opportunities for the Borough’s residents, businesses and voluntary section to contribute to and share in the success of Camden’s economy.
- 8.33 Draft New Local Plan Policy IE2 (Offices) Part B (i) notes that the Council will support proposals involving additional office floorspace and refurbishment of existing stock within parts of the CAZ where this is an established commercial, or mixed-use character.

Assessment

- 8.34 The proposals comprise commercial development appropriate to its central London and CAZ location. The existing and proposed mix of uses is as follows (GIA):

Table 3 Existing and proposed floor areas

Land Use	Existing (sqm GIA)	Proposed (sq m GIA)	Net Change (sq m GIA)

Commercial, Office Use (Class E)	18,113	32,435	+14,322
Retail and Restaurant (Class E) including Dry Cleaners (Sui Generis)	4,750	862	-3,888
TOTAL	22,863	33,297	+10,434

- 8.35 The Proposed Development seeks to optimise this previously developed urban land which is exceptionally well served by public transport. The Proposed Development is in accordance with the character and established mix of uses in the surrounding area. The development would refurbish and extend the existing office floorspace to create an additional 14,322 sqm of commercial, office floorspace, deliver 862 sqm of improved retail floorspace and re-establish a pedestrian route through The Site. The building will incorporate affordable workspace and deliver high quality new landscaping across The Site with two new areas of public realm.
- 8.36 The Site has been subject to a previous planning permission for its remodelling, refurbishment and extension (ref: 2016/5202/P, dated 22 May 2018), demonstrating the appropriateness and importance of The Site for investment to deliver improvements to the character and function of The Site and its immediately surrounding area.
- 8.37 The Site is located within the CAZ, and the proposals would enhance the office function of this location in line with London Plan Policy SD4.
- 8.38 Part F of Policy E1 of Camden’s Local Plan outlines that between 2014 and 2031 the forecast demand for office space in Camden sits at 695,000 sqm, equivalent to 41,000 sqm per year.
- 8.39 The proposed office floorspace has been designed to be flexible and adaptable in line with London Plan Policy E1. This is to ensure the building can be adapted to meet the demands of future tenants.

8.40 There continues to be strong demand for well-located, high-quality, flexible and sustainable commercial space. The Proposed Development has been designed with this in mind, to enable occupiers to respond and adapt to changing ways of working and continue to attract talent.

8.41 As set out in the Employment and Skills Strategy prepared by Ekosgen, the Proposed Development would support 2,165 jobs directly onsite and 1,083 indirect jobs across London. In addition, there would be 225 direct and indirect construction jobs supported per year during the course of construction. Using the proposed build cost, this would generate 47 construction apprentices. The Applicant would work with the Kings Cross Construction Skills Centre to find these apprentices.

Affordable Workspace

8.42 Part F of Policy E2 (Employment Premises and Sites) of Camden's adopted Local Plan states that LBC will consider a higher intensity redevelopment of sites that are considered suitable for continued business provided that (amongst other conditions) the proposed premises include floorspace suitable for start-ups and small and medium-sized enterprises, such as managed affordable workspace where viable.

8.43 The Employment Sites and Business premises CPG (January 2021) confirms that LBC will seek to provide affordable workspace for small and medium sized enterprises ('SME') from large scale employment developments with a floorspace of 1,000sqm (GIA) or more. Examples of how affordability is provided may include 20% of the workspace to be provided at 50% of comparable market values or an element of the floorspace to be offered to an affordable workspace provided at a reduced rent.

Emerging Local Planning Policy

8.44 LBC Draft New Local Plan Policy IE4 (Affordable and Specialist Workspace) requires that all major schemes (including mixed-use developments) providing at least 1,000 sqm GIA of offices to contribute to the delivery of affordable workspace and will seek 20% of the gross floorspace to be provided at 50% of the market rent for a minimum period of 15 years.

Assessment

8.45 The Applicant has consulted Bow Arts to discuss the proposal. Given the location of The Site, the proposed affordable workspace would target theatre/creative users in the first instance. Located at the ground floor overlooking the new public realm and route through the Site, the proposed affordable workspace measures 464 sqm (NIA) with a 40% reduction in market rent.

Retail/restaurant (Class E)

National Planning Policy

8.46 The NPPF seeks to support the role that the town centre plays at the heart of local communities, taking a positive approach to their growth, management and adaption (Paragraph 90).

Regional Planning Policy

8.47 London Plan Policy SD6 Part F seeks to promote and enhance the vitality and viability of London's varied town centres. The policy recognises that a mix of vibrant town centre uses should be delivered.

8.48 Policy E9 advises that a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported.

Local Planning Policy

8.49 LBC Local Plan Policy TC1 states that the Council will focus new shopping and related uses in LBC's designated growth areas and existing centres, having regard to the level of capacity available in these locations.

8.50 Policy TC2 advises that the Council will promote successful and vibrant centres throughout the Borough to serve the needs of residents, workers and visitors. The Council will seek to protect and enhance the role and unique character of each of LBC's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located.

8.51 Policy TC2 also outlines that new retail spaces should be of high quality, provide generous storey heights and incorporate room for signage.

- 8.52 Policy TC4 is clear that the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours.
- 8.53 Policy TC4 is clear that the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local are or the amenity of neighbours.
- 8.54 LBC's 'Town Centres and Retail' CPG (January 2021) identifies that part of The Site falls within the southern part of the Central London Frontage area, with some current units being part of the secondary frontage adjacent to Charing Cross Road.

Emerging Local Planning Policy

- 8.55 LBC Draft New Local Plan Policy IE6 paragraph 9.91 states that they key to the vitality and viability of centres is retaining a cohesive mix of uses at ground floor level. Policy IE6 Part A (xii) advises that the Council expects new frontages to be well-designed and respond to positive examples in the local street scene in terms of proportion and local impact. Excessively sized fascia's and proliferation of signage/adverts will be resisted.

Assessment

- 8.56 At present, there are a number of vacant retail uses at ground floor. The existing units provide deep, and dark, floorplates which do not lend themselves to prime retail floorspace. The scheme proposes to deliver 862 sqm (GIA) of new and improved retail floorspace which has been designed to activate street frontages and the new route through The Site. Signage zones have been designed into the building. Details of any signage would be subject to separate applications for advertisement consent.
- 8.57 Whilst there is a reduction in retail floor space, the proposal will provide an increase of 30m of active frontages to the Site which will contribute to this central London location. The principle for retail use at ground floor level is supported by policy, given The Site's CAZ location, Central London location, Central London Frontage allocation and a need to activate the ground floor frontages at the ground floor level of the building. The Site should therefore be promoted as part of a competitive town

centre which provides customer choice and a diverse retail offer in line with national, regional and local policies.

Mixed Use

National Planning Policy

- 8.58 One of the core principles of the NPPF is to promote mixed use developments and encourage multiple benefits from the use of land. Chapter 5 of the NPPF provides a framework for delivering a sufficient supply of homes by setting out how Local Authorities should assess and plan for housing need to be met through sufficient land being available to meet housing need.

Regional Planning Policy

- 8.59 The Site is located within the London Plan defined CAZ.
- 8.60 Policy SD6 of the London Plan seeks to continue to support the unique functions the CAZ fulfils for London, the UK and internationally, and the development needed to sustain it. The policy identifies a strategic priority to promote and coordination development to provide a competitive, integrated and varied global business location.
- 8.61 London Plan Policy SD5 and Paragraph 1.3.3 of the CAZ SPG sets out that offices and other CAZ strategic functions should be given greater weight relative to new residential development in the CAZ.

Local Planning Policy

- 8.62 Policy H1 of the LBC Local Plan sets out that self-contained housing is the priority land use across the Borough.
- 8.63 LBC Local Plan Policy H2 seeks to achieve commensurate levels of self-contained housing whenever non-residential development is proposed to ensure a balance of users across the Borough. The policy requires where more than 200sqm GIA of non-residential development is proposed in the Central

London Area, 50% of the additional floorspace will be required to be delivered as self-contained housing with an appropriate mix, including affordable housing where relevant.

8.64 Policy H2 sets out several factors that the Council will consider in determining whether self-contained housing is required as part of a mix of uses (parts a-e). Parts A to F and included below:

- a. The character of the development, The Site and the area;
- b. Site size, and any constraints on developing The Site for a mix of uses;
- c. The priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- d. Whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
- e. Whether the development is publicly funded or serves a public purpose

8.65 Where housing is required as part of a mix of uses, LBC require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the council is satisfied that providing on-site housing is not practical or housing would be more appropriately be provided off-site, it will seek provision of housing on an alternative site nearby, or exceptionally a payment in-lieu. In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, Policy H2 goes onto state the Council will consider criteria (a) to(e) and the additional criteria as set out in parts f-j.

8.66 Local Plan Policy H4 seeks an affordable housing target of 50% for developments with capacity for 25 or more additional dwellings.

Emerging Local Planning Policy

8.67 LBC Draft New Local Plan Policy H2 (Maximising the Supply of Self-Contained Housing from Mixed-Use Scheme) seeks to achieve a 50% target to all additional floorspace proposed. Part B (i-x) sets out that the council will seek to negotiate the contribution to permanent self-contained housing in the South Camden area.

Assessment

- 8.68 One of the aims set out in the NPPF is to ensure that developments optimise the potential of the site to accommodate development, sites should create and sustain an appropriate mix of uses and support local facilities and transport networks (Paragraph 129). It is therefore important to ensure that a range of needs can be met through a new development.
- 8.69 The Site is located within the London Plan defined CAZ and Camden's Central London Area. The Proposed Development would result in an additional 10,434 sqm GIA commercial (Class E) floorspace. The increase in floorspace proposed is a result of a more efficient use of internal space, the infilling of lightwells and extensions to the existing building.
- 8.70 Local Plan policy H2 requires the provision of up to 50% of total additional floorspace to be provided as housing. If housing cannot be achieved on site, a contribution to off-site housing may be considered. In exceptional circumstances the Council may accept a payment in lieu. The proposed uplift is 10,434 sqm resulting in a residential requirement of 5,217 sqm.

On-Site Provision

- 8.71 In accordance with Local Plan Policy H2 The Applicant has reviewed the Proposed Development for opportunities to deliver residential floorspace on site. In assessing the Proposed Development against Policy H2, it is considered that housing is not required to be delivered on Site in accordance with the following policy criteria:
- a. the character of the development, The Site and the area;**
 - b. Site size, and any constraints on developing The Site for a mix of uses;**
 - d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;**
 - f. the need to add to community safety by providing an active street frontage and natural surveillance;**
 - h. the impact of a mix of uses on the efficiency and overall quantum of development;**

j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

8.72 The Applicant has produced a Housing Study, which assesses the possibility and constraints of providing housing on-site and off-site. This report was discussed and agreed with Officers in July 2024 during the pre- application process.

8.73 The report has found that where residential floorspace can be physically accommodated on site, the proposed units would be of a very poor quality for the following reasons:

- residential units would be predominantly single aspect;
- residential units would include north facing aspect in most cases;
- poor residential amenity standards, including daylight and sunlight, amenity space, outlook and vibration;
- there is no amenity space provision for any of the options. If this were to be included it would further impact the rest of the commercial floorplate, reducing its viability.
- an inefficient net to gross ratio makes the proposals unviable;
- there would be a significant negative impact on the retail and office floorspace should residential be introduced into the building; and
- a number of the options tested out render the floorplate unviable for the remaining uses.

8.74 There is a recognised need for additional employment floorspace in Camden. Local Plan Policies G1, E1 and E2 seek to secure the economy through creating conditions for economic growth and the protection and provision of employment floorspace. Paragraph 5.23 specifically seeks to support and promote Knowledge Quarter uses.

8.75 In design and heritage terms, the height, bulk and mass of the Proposed Development on the Site has been rigorously tested throughout the pre-application period with LBC design officers. The Site is in a sensitive location in terms of the historic built environment given its proximity to several listed buildings and two designated conservation areas. The overall development envelope has been informed by the surrounding context and an extinct historic public route through The Site is to be re-established within the proposed designs at ground floor level, a key public benefit of the Proposed Development.

8.76 The proposal has been designed to improve the previously approved application. It is worth noting that under the previous planning permission (ref: 2016/5202/P), LBC agreed that it was not possible to provide adequate on-site residential accommodation due to the following site constraints (Committee Report paragraphs 6.11 and 6.13):

- i. The proposal is a remodelling/refurbishment of the existing building, which restricts development possibilities;*
- ii. Most flats would need to be single aspect given the layout of the existing building and the depth of the floorplates, the existing floorplates were designed for office use and it would be difficult to create flats with an acceptable level of amenity;*
- iii. Much of the building edge faces north-west or north-east and so the only parts of The Site that could be suitable for residential are on the southern, western and eastern sides;*
- iv. New residential could not be introduced on to Caxton Walk given the narrow separation distances with existing residential which would result in overlooking issues to the existing residential properties on Caxton Walk;*
- v. The provision of residential on the western, eastern or southern sides of the building would impact on the usability of the proposed offices as they would lose windows along that side; and*
- vi. Residential use in the same building would require a separate core which would result in a significant loss of floorspace on The Site, a poor ratio of usable floorspace to core and a subsequent reduction in the overall viability of the scheme.*

8.77 Whilst the need for more homes in Camden is recognised by The Applicant, it would be inappropriate to require the Proposed Development to deliver permanent self-contained homes on-site. It has been demonstrated here that residential use would not be commensurate with the adopted and emerging policy aims for The Site and would restrict the provision of a substantial quantum of commercial floorspace which would meet the Development Plan objectives to promote, support and enhance employment, innovation and knowledge sector uses in this location.

8.78 Not providing housing on-site therefore meets the criteria within Policy H2 parts a, b, d, f, h and j.

8.79 It is also worth noting that Policy H2 criterion c, e, g and i are not relevant to the assessment of the Proposed Development for the following reasons:

- c. The site is not located within the Hatton Garden area;
- e. The development is not publicly funded;
- g. No existing users are remaining in situ; and
- i. There are no distinctive viability characteristics associated with the proposals.

Off Site Provision

8.80 The Applicant does not own any other sites within Camden.

8.81 In accordance with Policy H2, an off-site search has been conducted by Knight Frank to determine whether there are any sites in the Borough available to purchase for housing (see Housing Study, page 38). The assessment included sites to the south and north of the Euston Road and concluded that there are no off-site locations suitable.

Payment-in-lieu (PiL) of housing

8.82 Given the design constraints preventing the delivery of good quality residential floorspace on-site and that The Applicant does not own a donor site, it is appropriate that housing should not be provided on-site or via off-site residential floorspace.

8.83 LBC Draft New Local Plan Policy S1 part F states that *“The Council is committed to a programme of estate renewal and regeneration delivered through the Council’s Community Investment Programme (CIP). The main focus of this work in the South of the borough is the Agar Grove Estate, north of Camley Street and the Tybalds Estate in Holborn. Development coming forward in the South of the borough will be required to support the Council’s estates mission and assist with the delivery of the Council’s priorities for nearby housing estates”*.

8.84 The Applicant therefore proposes a Payment in Lieu subject to viability to towards off -site housing through Camden’s Community Investment Programme.

9 Design

- 9.1 The section assesses the proposals against relevant national, regional and local planning policy in terms of design.

National Planning Policy

- 9.2 Chapter 12 of the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
- 9.3 Paragraph 131 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 9.4 Paragraph 135 of the NPPF states that development should function well and add to the overall quality of the area over the lifetime of the development. In pursuance of this, development should be visually attractive, sympathetic to local character and history and maintain a strong sense of place and distinctiveness. Further, this paragraph identifies that securing high quality and inclusive design goes beyond just aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment, whilst being safe, inclusive and accessible.
- 9.5 While achieving this, development should optimise the potential use of The Site including delivering an appropriate mix of green and public space. The application of policy should not discourage appropriate innovation or change. Design quality should be considered throughout the evolution and assessment of individual proposals.

Planning Practice Guidance

- 9.6 Paragraph 4 of the PPG: Design (2019), states that local planning authorities are required to take design into consideration and should give great weight to outstanding or innovative

designs which help to raise the standard of design more generally in the area. It states that planning permission should not be refused for buildings or infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).

9.7 Paragraph 15 of the PPG on Design sets out the key characteristics of well-designed places.

Regional Planning Policy

9.8 Policy D3 sets out how site capacity should be optimised through a design-led approach. The factors considered in this are: form and layout, experience and quality and character.

9.9 Policy D4 states that the design of development proposals should be thoroughly scrutinised in regard to its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping.

9.10 Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design.

9.11 Policy D9 requires the boroughs to provide a definition of 'tall building' for areas that have been identified as appropriate for tall buildings with future Development Plans identifying these locations. Part C of the Policy D9 sets out the Visual, Functional and Environmental criteria against which tall buildings should be assessed.

Local Planning Policy

9.12 At a local level, LBC Local Plan Policy D1 seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use. The policy lists characteristics LBC will expect to achieve this policy objective.

9.13 Policy D1 also sets out LBC position on tall buildings. For the purposes of this policy, paragraph 7.35 states that 'tall buildings are considered to be those which are substantially

taller than their neighbours or which significantly change the skyline’. Paragraph 7.36 of the Local Plan goes on to state that LBC has not defined areas where tall buildings will be appropriate given the diverse and mixed range of building heights in the borough.

- 9.14 Policy D3 (a-f) sets out what criteria LBC will consider when assessing proposed shopfront designs.
- 9.15 LBC has also published a Planning Guidance CPG: Design (January 2021) establishes key design principles which are to be incorporated and used in the assessment of development proposals. The document reinforces or where necessary amplifies existing guidance and defines the Council’s expectations for new buildings, as positive and enduring additions to this unique urban landscape.

Emerging Local Planning Policy

- 9.16 LBC Draft New Local Plan Policy D1 outlines that all development in Camden must achieve excellence in the architecture and design of buildings and places to respond to the climate change emergency, improve the health and wellbeing of Camden’s communities and celebrate the diversity of people and places. The policy lists characteristics LBC will expect to achieve this policy objective.
- 9.17 Policy D2 of the LBC Draft New Local Plan sets out Camden’s position on tall buildings. The policy states that tall buildings are those which “are over 40 metres in height in the Central Activities Zone and over 30 metres elsewhere in the borough, when measured from the lowest point of the group to the uppermost part of any rooftop structures”. Part C (i-xiv) of D2 sets out what criteria Camden will consider when assessing proposals for tall buildings.
- 9.18 As part of the evidence base of LBC’s Draft New Local Plan, a Building Heights Study was undertaken in 2023. The borough was mapped to understand the existing context heights. The Site was assessed as being 13 storeys or more.
- 9.19 LBC Draft New Local Plan Policy D8 advises that the Council expect a high standard of design in new and altered shopfronts, canopies, blinds, security measures and also sets out what criteria LBC will consider when assessing proposed shopfront designs.

Other Relevant Guidance

- 9.20 In terms of draft GLA guidance, the Public London Charter, which sets out eight objectives for both internal and external public realm in London, has been considered and assessed as part of the proposed design for the public realm.

Assessment

Design Development

- 9.21 The design of the building has been led by sustainability considerations and The Site's sensitive location nearby several statutorily listed buildings. The final proposed design has been informed by a series of workshops with LBC planning and design officers. The design has also been presented to LBC's Design Review Panel (DRP), in line with London Plan Policy D4.
- 9.22 Following the first DRP meeting, the feedback highlighted (i) concerns over the additional massing resulting in an overbearing appearance and an articulation of the buildings form could reduce the dominance of the upper storeys; (ii) an informal, textured material palette, potentially using recycled materials, could allow for a contextual yet authentic and contemporary solution; (iii) the column on the New Compton Street side to be removed to allow for more circulation space and views; (iv) recommendation to pursue community use in the ground floor corner retail unit, to relate to the existing community spaces opposite and transform the 'back-of-house' nature of Stacey Street.
- 9.23 When the design was presented to the design and conservation officers at Camden following the DRP, the design team tested an idea with rich coloured facades, different to what was in the approved scheme. Feedback was that the team should focus on facade detailing and richness on the lower levels of the building, that is immediately seen by the pedestrians, and the upper levels should be more recessive in nature.

Proposed Design

Principle of Partial Demolition and Extension

- 9.24 At the very earliest stage of the project, the design team considered development at The Site which retained the existing building. However, it was found that it was not possible to optimise the development potential of The Site whilst retaining the existing building. The Proposed Development will have a structure retention of 75%.
- 9.25 The final DRP response welcomed the improvements to the sustainability strategy of the previously approved scheme, particularly the efforts to reuse more of the existing building and to remove transfer structures where possible.

Height, Bulk and Mass

- 9.26 London Plan (2021) Policy D9 requires boroughs to define [in future] Development Plans what they consider to be a tall building for specific locations and identify suitable locations for tall buildings. The supporting text to LBC's Local Plan (2017) Policy D1 set out that tall buildings are those which are "substantially taller than their neighbours or which significantly change the skyline", but the Plan does not identify specific sites for future tall buildings, due to the diverse nature of the Borough, and so advocates a site-by-site assessment of suitability.
- 9.27 125 Shaftesbury Avenue is currently an existing tall building and has been proposed in the Building Heights Study (2023) undertaken as part of the Draft New Camden Local Plan as being a building suitable for 13 storeys or more.
- 9.28 The Proposed Development has been assessed against the criteria in London Plan Policy D9 (Part C) as follows:

Visual Impacts

a) the views of buildings from different distances: (i) long range, (ii) mid-range and (iii) immediate views from surrounding streets

- 9.29 The visual impacts of the Proposed Development have been rigorously assessed as part of the Heritage, Townscape, and Visual Impact Assessment ("HTVIA") submitted as part of the application, including a comprehensive assessment of long, mid-range and local views. Once complete the building has been assessed to be a beneficial addition to the townscape, by

comparison to the existing building on the site. Further detail is set out in Chapter 10 of this Statement: Townscape, Heritage and Views.

b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.

9.30 The building has been designed to improve the legibility of the area. At ground floor level a new pedestrian walkway is proposed to introduce permeability at the site and reconnect the north and south areas of the Site for the first time in decades. In terms of land uses, active retail uses and community uses are proposed at ground floor to revitalise the Site's street scene. The community use is located on The Phoenix Garden façade, looking on to the garden.

9.31 Section 5.4 of the DAS demonstrates how the facades upper storeys have been designed to respond sensitively to their individual contexts as follows:

- i. Cambridge Circus, the considered form and massing of the new upper levels is generated by referencing the geometry of Cambridge Circus and is designed to be viewed as a background to the circus itself. The massing positively engages with the different contexts of Cambridge Circus, Shaftesbury Avenue and Charing Cross Road.
- ii. Charing Cross Road, the shoulder height of the proposal aims to work with similar datums to newer developments along this road with materiality used to break up massing to clearing distinguish the upper levels from the lower levels.
- iii. Old Compton Street, the proposed building presents a visually engaging composition that is lighter in appearance when compared to the existing structure. In this view the proposed building also increases urban legibility with more active frontage, the new double height main entrance is clearly visible from here, positioned at the chamfered corner with Caxton Walk.
- iv. Shaftesbury Avenue, the principal elevation to Shaftesbury Avenue will provide a well-proportioned frontage to this street. Retail units animate the ground floor of this façade on Shaftesbury Avenue, turning the corner to Stacey Street and the setback top levels are articulated differently from the levels below, helping to break up the massing.
- v. St. Giles Courtyard, the existing building appears as a monolith in this view. The proposed building presents itself as a composition of similar, yet subtly different, volumes.

Planting on the upper floor terraces will make a visual connection to the public realm and the junction of the three street buildings is articulated as a fissure, drawing down the brass materiality of the upper floors to ground floor level in order to mark the location of the pedestrian route. The red Stacey Street building grounds the building in the foreground and closely relates in tone to the residential buildings in the foreground of this view.

- vi. New Compton Street, currently the loading bay dominates this view. The proposed building relocates the loading bay, enabling the facade composition from this view to be articulated to mark the location of the entrance to the pedestrian route. A clear distinction between the architecture of the upper and lower floors reduces the overall perceived scale of the building, which is currently seen as a monolithic wall that terminates New Compton Street and active frontages are proposed at ground level to transform the existing 'back of house' street scene.

c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.

9.32 Section 5.7 of the DAS demonstrates the material palette sought for The Site. The material expression of the proposed scheme has been developed to give a clear identity to the building and reflects the more nuanced use and articulation of materials within the local context.

9.33 The Proposed Development has been carefully designed by DSDHA to an exemplary standard, using high quality materials which ensure that the appearance and architectural integrity of the building would be maintained throughout its life.

d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.

9.34 The Proposed Development has been designed to positively contribute to and complement the character of the area. A detailed assessment of the heritage impacts of the Proposed Development has been undertaken as part of the HTVIA, which finds that the Proposed Development would transform the Site into an outward-facing building that engages positioned with its surroundings, enhancing the overall urban environment in its locality. This is set out in further detail in Chapter 10 of this Statement: Townscape, Heritage and Views.

e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it

9.35 Not applicable.

f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.

9.36 Not applicable.

g) buildings should not cause adverse reflected glare

9.37 As set out in Section 5.7 of the DAS, the proposed materiality palette has been carefully selected to ensure that the building responds to context. The materiality chosen should not cause adverse reflected glare due to their solidity.

h) buildings should be designed to minimise light pollution from internal and external lighting

9.38 As set out on pages 150-152 of the DAS, the lighting strategy for the Proposed Development has been designed to integrate with the dynamic character of the surrounding public areas, adding value to the community. The lighting will use the pedestrian route and new canopies as an opportunity for playful dialogue and link between the varied lit characters in the neighbourhood. After hours office lighting will be controlled, with ground floor illumination establishing a welcoming environment.

2. Functional Impacts

a) The internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants

9.39 The safety of all occupants of the building has been a priority throughout the design process. Further details are set out within the Fire Statement, prepared by The Fire Surgery.

b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process.

9.40 All servicing will take place via the off-street loading bay accessed via Stacey Street to minimise disturbance to neighbours. This is discussed further within Section 13 of this Planning Statement and within the Operational Waste Management Strategy, prepared by Waterman.

c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas

9.41 The lobby of the building has been relocated to Charing Cross Road. Two entrances allow access at the west and south end of the lobby to accommodate arrival from both Charing Cross Road and Caxton Walk. The number of entrances proposed would ensure even dispersal of people and enhanced permeability. Furthermore, the introduction of a new pedestrian route through the Site will increase pedestrian circulation and distribution across the Site and in the immediately surrounding street network.

d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building.

9.42 The Site has an excellent public transport accessibility level with the highest possible rating of PTAL 6b. The Site is mainly served by Tottenham Court Road Underground Station (north), Leicester Square Underground Station (south) and Covent Garden Underground Station (southeast). There are also several bus routes that serve the site along Charing Cross Road (within 50m of The Site). There are a range of services and facilities to accommodate those working in and visiting 125 Shaftesbury Avenue.

9.43 A Transport Assessment (TA) has been submitted with the proposals, prepared by Waterman. The TA concludes that the trip generation created by the Proposed Development would not have a significant adverse impact on the surrounding transport systems (paragraph 9.6).

e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area and maximises the role of the development as a catalyst for further change in the area.

9.44 The Proposed Development would anchor the southern end of the Knowledge Quarter, through providing high quality office and affordable workspace.

9.45 The offering of retail units, together with the employment generated from the commercial, office, including affordable workspace within the Proposed Development would result in a significant increase in activity in the area. Investment into retail units at The Site would increase footfall which would further attract and become a catalyst for investment and regeneration.

9.46 As set out in the Employment and Skills Strategy, prepared by Ekosgen, the proposed development will support around 2,165 on-site FTEs once operational plus a further 1,083 indirect jobs in the supply chain and through employee spending making a total of 3,248 jobs. The GVA associated with these jobs is estimated at £450m per year.

f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings

- 9.47 Interference to the reception of digital terrestrial and satellite television services is not expected.
- 9.48 GIA has considered the impact of the Proposed Development on solar panels (see Chapter 6 of the submitted Daylight and Sunlight Report). They have found that none of the PV panels at the identified future receptor (104-110 Charing Cross Road) experience an alteration beyond 5% and therefore, no significant loss of radiation will occur to the future receptor.
- 9.49 A draft Construction Management Plan has been submitted with the application, and a further version of this will be required by condition and will be submitted when a contractor is on board. This will ensure the construction of the Proposed Development does not interfere with aviation, navigation or telecommunication.

3. Environmental Impacts

a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building

- 9.50 Section 7.8 of the DAS presents the sun and wind studies for the Site. Section 1.13 of the Daylight and Sunlight Report, prepared by GIA states confirms that two of the three assessed amenity areas achieve strict BRE compliant. The one remaining amenity space is a small south facing terrace within 1A Phoenix Street. When this space is assessed against the Historic Permission, the Proposed Development creates marginally more direct sunlight on the spring equinox (21st March) producing a betterment in sunlight enjoyment. Paragraph 1.14 of the same report goes on to state that, of the two future amenity areas located at 104-110 Charing Cross road, one area breaches guidance however, the absolute loss is just 0.01 square metres, which won't be noticeable. The remaining area will meet BRE guidance.

b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions

- 9.51 The Air Quality Assessment (AQA), prepared by Tetra Tech, sets out that, due to the fact that the scheme is car free a quantitative dispersion modelling assessment for the operational phase has been scoped out.

9.52 The AQA goes on to state that the impact on air quality during the operational phase of the development will be Air Quality Neutral in relation to building and transport emissions.

c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building

9.53 The Noise Impact Assessment, prepared by Hann Tucker Associates, concludes that the proposed plant, in conjunction with the proposed mitigation measures, should be capable of achieving the proposed atmospheric plant noise emission criteria at the nearest noise sensitive receptors. Therefore, the comfort and enjoyment of open spaces around the proposed buildings will not be harmed.

4. Cumulative Impacts

a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.

9.54 A number of proposals for new developments near The Site that have been granted planning permission or are under construction, are considered within the HTVIA (see paragraph 2.23 of that report). A series of 'cumulative' views have been tested and are provided within the HTVIA.

Part D Public Access

Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.

9.55 The Proposed Building provides new pedestrian connections at ground floor level and community uses/ affordable workspace where it is considered public is most appropriate. It

is therefore not considered appropriate to provide publicly accessible areas at the upper levels of the building.

Interim Conclusion – Policy D9

- 9.56 It is considered that the detailed assessment of the Proposed Development against the criteria framework set out to assess the acceptability of a tall building, clearly demonstrates that the scale of the buildings proposed in this development would be appropriate and compliant with Policy D9 when considered as a whole.

Internal Arrangement

- 9.57 The commercial, office space (Class E) will be located on the first to twelfth floor. The exact internal layouts will however be subject to further refinement to reflect future needs. Retail use at ground level would activate the streetscape on to the new area of external public realm.
- 9.58 The entrance lobby is located at the Charing Cross Road and adjacent to the pedestrian walkway. The atrium will be visible from the entry providing visual connectivity through the building. A generous feature staircase connects the end of trip facilities on the basement floor with the first floor and base of the atrium encouraging active travel between floors.

New Route

- 9.59 The development includes the reinstatement of the historical connection of Old Compton Street and New Compton Street.
- 9.60 The route is designed to follow the structural grid of the building to minimise demolition and maximise its height that otherwise would be comprised with deep transfer beams or columns mid-way through the passageway.
- 9.61 Creating a new route through The Site and open space on Caxton Walk will increase permeability and accessibility. The route will also contribute to a better level of natural surveillance and better maintained area throughout retail ground floor units.

Outdoor Amenity Space

- 9.62 Accessible terraces face Charing Cross Road, offering generous planting visible from the street level, while maximising the event spaces for the 8th, 10th and 12th floors. The greenery cascading into the Caxton Walk directs and invites pedestrians into the passage leading to the public realm located right next to The Phoenix Garden.
- 9.63 On the terraces circa 15 new trees are proposed, visible from street views in key points. The trees mark corners of the building and provide a continuation of greenery from The Phoenix Garden.

Rooftop

- 9.64 Details on the rooftop layout are included at page 157 of the DSDHA's DAS. The plant equipment will be housed in an open plant space on the 12th floor, the façade of which is a continuation of the façade treatment at this level with solid or mesh panels to minimise any visual impact from ground level. The roof is to be covered with PV panels and a green roof.
- 9.65 It is therefore considered that the Proposed Development has been designed in line with Local Plan Policy D1(o) which requires building services to be carefully integrated into building design.

Facades and Materiality

- 9.66 Section 5 of DSDHA's DAS demonstrates how the proposed façade materiality has been developed to respond to its unique location and surrounding context and enhances the local environment by responding to the characteristics of the area. The proposed material palette is set out at pages 103-104.
- 9.67 At a lower level, brass coloured metalwork is used at ground and first floors to denote a strong plinth to the building.

- 9.68 The use of red brick and red precast on the Stacey Street elevation adds texture and a domestic scale element to this façade. Brickwork is highly articulated to brighten up a previously neglected corner of The Site.
- 9.69 Light coloured natural stone and Reconstituted Stone at Shaftesbury Avenue and Charing Cross Road takes reference from its neighbouring context, namely the strong horizontal articulation in light coloured stone.
- 9.70 Reconstituted stone/ pre-cast concrete is continued to the top of the building in the form of horizontal slabs. The articulation of these is simpler than the cornices of the lower levels. Brass coloured fins provide vertical articulation to the upper floors of the building bringing warmth to the facade.
- 9.71 Where the Shaftesbury Avenue building rises above its neighbour, the proposed scheme treats this as a separate architectural element - a new red brick flank wall. This is visible in both the view from Cambridge Circus and from Romily Street. The red brick flank wall compositionally balances the existing flank wall and chimney stacks of Trentishoe Mansions and is articulated with a similar arched language that can be seen recessed into the brick of the chimneys. This feature helps the concave architecture of the top of the building to recede into the background of this significant townscape view.
- 9.72 Further, loggias are proposed allowing the glazing line to be pulled back from the facade on the southern elevation to benefit from passive shading whilst generous terraces with brass-coloured balustrades compliment the warmer tones of the upper levels.

Public Realm

- 9.73 The public realm design is described in Section 6 of DSDHA's DAS assessed in greater detail in Section 11 of this Statement. In line with LBC Local Plan Policy D1 (k) and LBC Draft New Local Plan Policy HGC1, the public realm has been designed following a detailed study of the surrounding street and open spaces network and in close consultation with the local community to ensure that the new public open space seamlessly integrates into its context.

Lighting and Accessibility

9.74 The DAS prepared by DSDHA sets out the inclusive design goals. The DAS demonstrates that the Proposed Development considers inclusive access and provides a range of options to cater for a variety of users. The entrances at the ground floor retail units will be level from street to building. The building entrances will afford step-free access from the street, across the threshold, into the building. Accessible entrances will provide a minimum clear opening width of 775mm and provide a clear 300mm nib to the side of the door, unless automated. Any automated doors will have accessible controls and suitable protection against collision with the door swing, where this opens out onto a public walkway. The commercial entrance will consist of two sets of revolving doors and one set of automated swing door on Charing Cross, and one set of revolving doors on Caxton Walk. Each set will provide a clear opening width in excess of 1,000mm.

9.75 The lighting strategy has been designed to integrate with the dynamic character of the surrounding public areas, adding value to the community. The lighting will use the pedestrian route and new canopies as an opportunity for playful dialogue and link between the varied lit characters in the neighbourhood. After hours office lighting will be controlled, with ground floor illumination establishing a welcoming environment.

Secured by Design

9.76 A Security Needs Assessment (SNA) has been undertaken by QCIC to establish the security requirement needs for the development. A combination of active and passive surveillance will be of paramount importance; a network of CCTV cameras will be installed which will be monitored 24/7, as well as a permanent onsite security presence.

9.77 Throughout this process there has been engagement (or attempts at engagement) with key internal and external development stakeholders including not only members of the Professional Team, but also the Metropolitan (MET) Police Designing Out Crime Commercial (DOCO), and local authority planning department.

9.78 Lighting will also be designed to ensure a safe and pleasant experience is maintained throughout the evening.

9.79 The critical need for proper management of public spaces is acknowledged and is reflected in the urban design approach to layout of the proposed uses and public realm as detailed within the Design and Access Statement.

Interim Conclusion

9.80 The proposals have been designed having regard to national, regional and local planning policy.

9.81 The design of the Proposed Development has been through a thorough design consultation process with input from interested stakeholders including the local community, the LBC planning and design officers and LBC's DRP. Where possible, comments received have been incorporated into the final design and have led to improvements to the scheme's design.

9.82 Sustainability considerations have led the design process. SWECO have had input into the scheme design since the initial design stages and throughout the pre-application process to ensure that the proposed building would have exemplary sustainability credentials.

9.83 Overall, it is considered that the proposed building is one of exceptional design. A comprehensive Design and Access Statement has been submitted with the application to assess the proposals, provides detailed design justification and illustrates how the design evolved during the project, through consultation with LBC, the local community and other key stakeholders and ultimately how the design of the building has been informed by both its context and by sustainability principles.

10 Heritage, Townscape and Views

- 10.1 This section considers the development proposals against relevant national, regional and local heritage planning policy and guidance relating to designed heritage assets, archaeology and townscape.
- 10.2 A full analysis of the effects of the Proposed Development on designated heritage assets is included within the submitted Historic Environmental Assessment, prepared by The Townscape Consultancy. These documents are submitted as part of the full planning application and should be read alongside this section of this Statement.

Statutory Legislation and National Planning Policy

- 10.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 10.4 Chapter 16 of the NPPF sets out policies relating to the conservation and enhancement of the historic environment, Paragraph 200 specifies that “in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”.
- 10.5 Paragraph 205 states that “when considering the impact of a Proposed Development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation”.
- 10.6 Paragraphs 206 and 207 provide a definition and the approach to harm which notes that “any harm to, or loss of, the significance of a designed heritage asset...should require clear and convincing justification.”

10.7 Paragraph 208 states that “where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.

10.8 The PPG on the Historic Environment (previously Conserving and Enhancing the Historic Environment) (2019) provides further guidance when assessing the impact of development proposals affecting heritage assets. It sets out that “significance” derives not only from a heritage asset’s physical presence, but also from its setting. It sets out that “public benefits” may follow from many developments and could be anything that delivers economic, social and environmental objectives as described at Paragraph 8 of the NPPF.

Regional Planning Policy

10.9 London Plan Policy HC1 (Heritage Conservation and Growth) outlines that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The policy is clear that the cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

10.10 Policy HC3 of the London Plan advises that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of a specific view.

10.11 London Plan Policy D4 (Delivering Good Design) seeks to sustain and enhance the distinctive environment and heritage of the CAZ, recognising both its strategic components and other features including distinctive buildings and historic heritage, through high quality design and urban management.

10.12 Policy D8 (Public Realm) of the London Plan states that development proposals should address visual impacts, including an analysis through long-range, mid-range and immediate

views from the surrounding streets; an architectural quality and materiality of an exemplary standard and consider nearby heritage assets and their settings.

- 10.13 Policy D9 (Tall Buildings) states that the boroughs should create area specific definitions of a tall building and that the development of tall buildings should only take place within areas that have been defined as acceptable for tall building by local development plans.

Local Planning Policy

- 10.14 LBC Local Plan Policy D1 (Part M & R) (Design) states that high quality design within development proposals should preserve strategic and local views, as well as the relationship between the building and hills and views.
- 10.15 The supporting text of Policy D1 (Paragraph 7.27) notes that LBC will protect the key views in accordance with London-wide policy and will resist proposals that would harm them. It is further states that developments should not detract from the panorama as a whole and should fit in with the prevailing pattern of buildings and spaces.
- 10.16 LBC Local Plan Policy D2 (Heritage) states that the Council will preserve and where appropriate, enhance LBC's rich and diverse heritage assets and their settings. In respect of designated heritage assets, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.
- 10.17 In respect of archaeology, the policy states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of heritage assets to preserve them and their setting, including physical preservation, where appropriate.
- 10.18 The Seven Dials Conservation Area Statement was issued in 1998 and describes the history, character and appearance of the conservation area.

Emerging Local Plan Policy

10.19 LBC Draft New Local Plan Policy D1 (Part iii & iv) (Achieving Design Excellence) states that the Council will require development to preserve or enhance the historic environment and heritage assets and respond to local views and preserve protected views.

10.20 LBC Draft New Local Plan Policy D5 (Heritage) notes that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets. Paragraph 12.62 advises that the Council will apply the policy and will not permit harm to a designated heritage asset unless the public benefits of the proposal outweigh the harm.

Heritage – Assessment

10.21 The Site does not lie within a conservation area but is within close proximity to the Seven Dials Conservation Area (CA), Denmark Street Conservation Area, Soho Conservation Area and Chinatown Conservation Area. There is one Grade I Listed Building within proximity to the Site, Church of St Giles in the Field, several Grade II Listed Buildings including Tower Street, Former Saville Theatre, Phoenix Theatre and Palace Theatre which is Grade II* Listed.

10.22 A Heritage, Townscape and Visual Impact Assessment (HTVIA) has been prepared by the Townscape Consultancy. The assessment on the effects of the Proposed Development on significance heritage assets in Section 7 of that report.

10.23 Overall, the HTVIA finds that the Proposed Development would cause no harm to the heritage significance of any heritage assets located in the surrounding area. Townscape Consultancy consider that "through its high architectural quality and contextually-influenced design, the scheme would mark a noticeable improvement on the character and appearance of the townscape setting of these heritage assets" (paragraph 10.9).

10.24 As such the scheme is in line with relevant statutory tests and London Plan and Local Plan policies HC1, D4, D1 and D2 in terms of heritage.

Townscape and Views - Assessment

10.25 Whilst 125 Shaftesbury Avenue is not within a Conservation Area, a Townscape and Visual Impact Assessment has been submitted alongside the planning application which includes a detailed assessment of the proposals in relation to the surrounding heritage context. The assessment concludes that the Proposed Development appropriately responds to the key views and would cause no harm to the heritage significance of any of the heritage assets located in the surrounding area.

Conclusion

10.26 In terms of heritage, townscape and views, the Proposed Development has therefore been assessed in line with the relevant statutory tests and national, regional, and local planning policy.

11 Environmental

Public Realm, Open Space and Routes

11.1 This section assesses the proposals in terms of landscape and external public realm.

Regional Planning Policy

11.2 London Plan Policy D8 sets out the characteristics that new public realm designs should meet. Policy G5 (Urban Greening) of the London Plan sets a requirement for major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscape (including trees), green roofs, green walls and nature based sustainable drainage. The Policy states that Boroughs should target an Urban Greening Factor score of 0.4 for predominantly commercial developments.

11.3 Policy G8 outlines that Boroughs should protect existing allotments and encourage provision of space for urban agriculture, including community gardening, and food growing within new developments.

11.4 The Accessible London: Achieving an Inclusive Environment LPG (2014) states that London's public space should be secure, accessible and inclusive and incorporate the highest design of landscaping. The SPG emphasises that major development should strengthen the connection between public spaces and existing local features and where appropriate, the public realm should promote the heritage values of the place. Additionally, major development must consider the landscaping of the place by incorporating the highest quality street furniture and infrastructure while ensuring easy movement of people through space.

11.5 The Healthy Streets for London (2017) guidance promotes aspirations for public realm improvements including greener streets and improvements to pedestrian and cycling routes.

11.6 The Urban Greening Factor LPG (2023) supports the policy on Urban Greening set out in the London Plan. The UGF is designed to provide flexibility to: enable an appropriate response

to meeting local green infrastructure priorities and site-specific constraints; and respond to different uses within a development.

- 11.7 In terms of draft GLA guidance, the Public London Charter, which sets out eight objectives for both internal and external public realm in London, has been considered and assessed as part of the proposed design for the public realm.

Local Planning Policy

- 11.8 At a local level, LBC Local Plan Policy A2 (Open Space) seeks to protect and enhance access to open space and green infrastructure within the borough. To secure new and enhanced open space, Part M of Policy A2 states that new development proposals within Camden will be required to apply a standard of 0.74 sqm per occupant for commercial developments while taking into account any funding for open spaces through the Community Infrastructure Levy.
- 11.9 The supporting text to Local Plan Policy A2 (paragraph 6.49), specifically references the use of financial contributions to create useable spaces such as widening of pavements as it is identified that this can often be a challenge in densely developed areas. Policy D1 (Design) states that the Council will only permit development for artworks where they protect and enhance the local character and historic environment and contribute to a harmonious and balanced landscape design.
- 11.10 LBC's Planning Guidance Note on Public Open Space (January 2021) provides further guidance and outlines the Council's expectation for the provision of new open space, including play facilities, to provide for equality of access.
- 11.11 LBC's Planning Guidance Note on Biodiversity (March 2018) also provides further guidance and advises that proposals must demonstrate how biodiversity considerations have been incorporated into the development.

Emerging Local Planning Policy

- 11.12 LBC Draft New Local Plan Policy SC3 (Open Space) aims to protect, enhance and improve access to Camden’s high-quality public open spaces, to promote health and well-being, enhance biodiversity and make space for nature within Camden. Part C (i) advises that the Council will seek 0.74 sqm of public open space per worker in commercial developments.
- 11.13 LBC Draft New Local Plan Policy D1 (Achieving Design Excellence) Part C sets out the criteria that the Council will require public spaces to be assessed against. Part C (ii) states that public spaces should be well located; of a high quality; and are designed to be safe, secure, welcoming, uncluttered and accessible for all.
- 11.14 LBC Draft New Local Plan Policy HGC1 Part D notes that development should where possible, reinstate historic alleyways, lanes and passages to increase permeability and encourage walking. Part E states that development must demonstrate the highest feasible levels of high-quality on-site open space and urban greening, whilst Part F advises that development must contribute to the improvement of the public realm, including an improved network of safe and attractive places and routes for pedestrians and cyclists that successfully links to neighbouring areas and reduces the dominance of traffic in the area.

Assessment

- 11.15 The full details of the landscape and external public realm strategy are presented in Section 6 of the Design and Access Statement, prepared by DSDHA and submitted in support of the Planning application.
- 11.16 The public realm strategy aims to create a new pedestrian route through the heart of The Site, providing opportunities for seating and interaction, and is animated by active frontage. It also aims to improve permeability and increase biodiversity through a planting scheme that complements the verdant environment on the nearby Phoenix Garden.
- 11.17 The strategy involves re-establishing the connection between Old and New Compton Street, which were connected to The Site up until the 1980s. The proposal would change the current ‘back of building’ into a new St Giles arrival destination, with a re-imagined public realm.

Public Realm Quantum

- 11.18 LBC's Public Open Space PG defines Public Open Space as "*public open space means open space which is fully accessible to members of the public and provides an inclusive environment in which all communities feel welcome*". It further advises that in commercial development, 0.74 sq m of open space should be provided per worker.
- 11.19 There is 521sqm of existing publicly accessible open space at the Site, including areas of stepping. The Proposed Development provides 732 sq m of improved, level open space at ground floor level, including the single height section of the publicly pedestrian route (please refer to the Design and Access Statement page 153). This represents an uplift of + 211 sqm of public open space at ground floor level, a substantial increase and a significant public benefit of the proposals.
- 11.20 The Proposed Development will also provide 953 sq m of open space to tenants on the upper floors through the provision of amenity terraces.
- 11.21 Based on the number of direct jobs created at the development (2,165), the scheme should deliver 1,602sqm of open space, in line with Local Plan Policy A2. Overall, the scheme is delivering 1,685sqm of open space, an overprovision of 83sqm against policy requirements.

New Route

- 11.22 The new route in principle is discussed in Section 9 of this planning statement. The new route is designed to follow the structural grid of the building to minimise demolition and maximise its height.
- 11.23 The paving concept for Little Compton Street has been created by careful selection of stone types, colours, textures and sizes create a subtle transition between different parts of paving. These elements recreate the way the site looked in the past. The subtle pattern breaks down the space and adds interest to the pedestrian route, inviting pedestrians to follow the line that is the recreation of the old route and street layouts.

Two New Areas of Public Realm

11.24 Two key public spaces are to be provided within the boundary of The Site. The creation of the new pedestrian route through the heart of The Site provides the opportunity to link these together, ensuring that the public realm is integral to the scheme.

11.25 The key design moves for the public realm aim to create a safer, more pedestrian friendly area that reduces vehicle dominance. By relating to The Phoenix Garden, the proposal creates a transitional space in front of the building that activates the currently neglected area

Public Spaces on Caxton Way

11.26 Key features would include planting, seating, lighting and high-quality paving materials and design (which is discussed above). A circular planter is proposed to wrap round an existing tree at Stacey Street and Phoenix Street, offering a wooden bench and a raised planter.

11.27 The Proposed Development also sees the enlargement of the north-south Pedestrian and Cycle Connection by creating inviting Public Realm on Stacey Street. This enhancement will provide a space to swell on the way between Tottenham Court Road and Covent Garden.

Lighting

11.28 The lighting scheme within the public realm has been designed by Spiers Major. As set out on page 151 of the DAS, the key design objectives for the lighting have been:

- To create a safe and inclusive environment throughout the day and night-time
- Engage with the vibrant and dynamic character of the surrounding public areas, adding value to the community;
- Delivering an attractive pedestrian route;
- Harmonise with the district respectfully, contributing positively to the local context; and
- Implement responsible lighting to avoid over-illumination, supporting sustainability and light pollution.

Security

- 11.29 Section 9 of the DSDHA DAS and the Security Needs Assessment (SNA) prepared by QCIC sets out the proposed measures which would be designed into the public realm. On Caxton Walk these measures include ensuring tree vegetation is maintained to preserve sightlines and where possible restricting access at night.
- 11.30 Main entrances and reception areas will be highly visible in well-lit areas, whilst retail units will generally have one entrance, with some units having the potential for more than one. Video Surveillance Systems (VSS) should also cover all building perimeter entrances. Furthermore, the lighting scheme (complete with suitable photometry and photo-electric cells) shall underpin, compliment, and support 'active (electronic)' and 'passive (natural)' surveillance needs, to create a space that feels 'safe and secure', both during normal business operating hours, and during periods of darkness (see DAS Section 10.7).

Interim Conclusion

- 11.31 Informed by a detailed analysis of The Site, the public realm strategy would unlock the existing Site, opening up the space for public use and reinstating the connection between Old Compton Way and New Compton Way. The public realm strategy promotes active travel, healthier journeys and great permeability. Sustainability, safety, security, accessibility and the environment has also been key considerations in the development of the design which has been developed following close consultation with LBC planning officers and the DRP.
- 11.32 It is therefore considered that the proposed landscaping is in line with relevant planning policy at all levels.

Ecology and Biodiversity

National Planning Policy

- 11.33 NPPF Chapter 15 seeks to conserve and enhance the natural environment.

11.34 Paragraph 180 of the NPPF is clear that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity and minimising effects on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Regional Planning Policy

11.35 London Plan Policy G6 states that development proposals should manage effects on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

11.36 Policy G6 also adds that proposals which reduce deficiencies in access to nature should be considered positively.

Local Planning Policy

11.37 At the local level Policy A3 (D) advises that LBC will assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a Proposed Development, proportionate to the scale of development proposed.

11.38 Part F of Policy A3 outlines that LBC will seek to improve opportunities to experience nature, in particular where such opportunities are lacking, and part G adds that the Council will require the demolition and construction phase of development to be planned to avoid disturbance to habitats and species.

Emerging Local Planning Policy

11.39 LBC Draft New Local Plan Policy NE2 (Biodiversity) Part v advises that the Council expects development to realise benefits for biodiversity through their layout, design and the materials used in their built and landscaping elements, taking account of the local ecological context, strategic and local opportunities for biodiversity gains. Part vi requires a biodiversity

net gain of at least 10% on eligible sites, with preference given for on-site or near site solutions. The net gains will be secured for a period of at least 30 years.

- 11.40 LBC Draft New Local Plan Policy NE1 (The Natural Environment) (viii) requires all development to enhance biodiversity in line with Policy NE2 above.

Statutory Legislation

- 11.41 Under the Environment Act (2021) there is a legislative requirement to demonstrate a 10% Biodiversity Net Gain (BNG) in new developments.

Assessment

- 11.42 The NPPF, in line with legislation, states that developments should deliver at least a 10% net gain in biodiversity. However, the site does not possess >25 sq m of semi-natural habitat it is therefore exempt from legislative BNG requirement. Despite this, a Biodiversity Net Gain Assessment (BNGA) has been undertaken by Greengage.
- 11.43 The Proposed Development habitat creation includes 0.0424 ha of biodiverse green roof, 0.0548 ha of introduced shrub and 15 small individual trees. The development seeks to retain the existing building which includes 0.2627 ha of developed land.
- 11.44 The pre-development baseline value is 0.00 Habitat Units (HU). The post-development proposals are predicted to deliver 0.59 HU. The Proposed Development therefore meets the BNG Trading Rules for habitat types and distinctiveness levels.
- 11.45 A Preliminary Ecological Assessment (PEA) has been undertaken by Greengage and has been submitted alongside the planning application.
- 11.46 The Lee Valley Ramsar/SPA/SSSI is located 8.2km from The Site. Impacts associated with construction and recreation from this site can be ruled out due to the distance, presence of dense urban development and associated infrastructure between The Site and the Ramsar/SPA/SSSI.

- 11.47 The Site is located within 7m of The Phoenix Garden SINC (local grade) and as such, is considered to be at risk from the construction phase of the development without due care and consideration. Construction impacts such as discharge of water or liquid waste, dust deposition. Vibration, noise and light spill will need to be carefully assessed and mitigation measures established prior to the commencement of any works on site and detailed within a CEMP. This can be secured via an appropriately worded condition on the planning permission. Direct impacts associated with the operational phase of the development are considered highly unlikely given there will not be an increase in the number of residents.
- 11.48 Deciduous woodland and wood-pasture and parkland UK BAP priority habitats were recorded within 1km, the closest parcel being within 480m of The Site boundary. Direct impacts associated with construction and recreation from this site are considered highly unlikely due to the geographical distance, presence of dense urban development and associated infrastructure between The Site and these UK BAP parcels. As such, no mitigation measures are required.
- 11.49 In terms of birds, further detailed surveys were not considered to be necessary however mitigation measures to minimise the impact of the development on active bird nests should be undertaken. This includes any works on the roof or terrace areas being conducted outside of the breeding bird season, typically recognised as March to August inclusive. Several House Sparrow boxes, Swift boxes and Black Redstart boxes are to be provided on the roof of the proposed building and along some terraces.
- 11.50 The Site was deemed to provide negligible suitability to foraging and commuting bats due to the areas high level of light disturbance and lack of vegetation and therefore no further surveys were required.
- 11.51 The Proposed Development also includes log piles, rope coils and water trays to provide additional habitats for invertebrates. Within landscaped areas, insect hotels and bee posts are also incorporated.
- 11.52 It is therefore concluded the Proposed Development is considered to comply with planning policy at all levels in respect of environmental outcomes.

12 Energy and Sustainability

12.1 The section assesses the proposals in terms of energy and sustainability.

National Planning Policy

12.2 NPPF Paragraph 20 (Part D) encourages strategic policies to consider the conservation of the natural, built and historic environment including landscapes, green infrastructure and planning measures to address climate change mitigation and adaptation.

12.3 NPPF paragraph 123 encourages development that makes as much use as possible of previously developed or 'brownfield land'.

12.4 NPPF Chapter 14 sets out how planning policies should meet the challenge of climate change, flooding and coastal change.

12.5 NPPF paragraph 157 sets out that planning policy should consider a low carbon future in a changing climate. Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development

Regional Planning Policy

12.6 In accordance with National objectives, the London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.

12.7 London Policy SI2 relates to minimising greenhouse gas emissions and states that major development should be net-zero carbon which means reducing greenhouse gas emissions in

operation and minimising both annual and peak energy demand in accordance with the energy hierarchy as set out:

- i. **Be Lean:** Use less energy and manage demand during operation
- ii. **Be Clean:** Exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
- iii. **Be Green:** Maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
- iv. **Be Seen:** Monitor, verify and report on energy performance

12.8 Part C of Policy SI2 states the requirement for a minimum on-site reduction of 35% beyond building regulations for major developments and that major commercial developments should achieve 15% through energy efficiency measures. Any shortfall should either be provided by a payment in lieu or an off-site solution.

12.9 Policy SI 4 (Managing Heat Risk) of the London Plan notes that development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. Major development proposals should demonstrate, through the submission of an energy strategy, how they will reduce the potential for internal overheating and reliance on air conditioning systems.

12.10 London Plan Policy SI13 seeks to achieve greenfield run-off rates and ensure surface water run-off is managed as close to its source as possible within developments.

12.11 Policy SI7 (Reducing Waste and Supporting the Circular Economy) of the London Plan states that referable applications should promote circular economy outcomes and aim to be net zero waste. As part of development proposals, a circular economy statement should be submitted to demonstrate the key aims set out in the policy.

12.12 Policy G5 of the London Plan states that major development proposals should contribute to the increased greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping, green roofs, green walls and nature-based sustainable drainage.

12.13 The LPG Energy Assessment Guidance (2022) states that all major developments must continue to meet the London Plan net zero carbon target by following the energy hierarchy targets (Policy SI2), the heating hierarchy (Policy SI3) as part of their energy strategy.

12.14 In regard to flood risk management and sustainable drainage, Policies SI12 and SI13 of the London Plan include the requirement to follow a hierarchical approach to surface water management with a preference for green over grey features and advocate that drainage should be designed and implemented in ways that promote multiple benefits including increase water use efficiency, improve water quality, and enhance biodiversity, urban greening, amenity and recreation.

Local Planning Policy

12.15 At a local level, through Local Plan Policy CC1, LBC requires all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan. The policy clearly requires all proposals for substantial demolition to demonstrate that it is not possible to retain the existing building.

12.16 In support of these objectives LBC requires the location of development and mix of land uses to minimise the need for car travel, support energy efficiency improvements to existing buildings and the optimisation of energy efficiency.

12.17 Local Plan Policy CC2 requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures. Local Plan Policy CC2 also promotes the incorporation of sustainable design and construction measures within developments. In January 2021 LBC updated the Camden Planning Guidance (CPG) 'Energy Efficiency and Adaptation' to ensure that the Council's commitment to reducing carbon emissions is achieved. This document includes a cascade regarding the demolition of existing buildings and whole life carbon cycles. LBC Planning Guidance 'Water and Flooding' (March 2019) also gives further guidance in respect of the water environment in LBC, water efficiency and flooding.

Emerging Local Planning Policy

- 12.18 LBC Draft New Local Plan Policy CC1 (Responding to the Climate Emergency) notes that the Council will prioritise the provision of measures to mitigate and adapt to climate change and require all development in Camden to respond to the climate emergency. Part A (i) notes that the Council will support the retrofitting of existing buildings to make them more energy efficient.
- 12.19 Part A (ii) of Policy CC1 advises that the Council will support the prioritisation and enabling of repurposing and the re-use of existing buildings over demolition.
- 12.20 LBC Draft New Local Plan Policy CC2 (Repurposing, Refurbishment and Re-use of Existing Buildings) Part E states that the Council will only permit proposals that involve the partial or substantial demolition of existing building/s, where it can be demonstrated that:
- The Applicant has comprehensively explored a range of alternative development options, informed by a condition and feasibility assessment, prior to considering full or partial demolition.
 - The proposal constitutes the best use of The Site, when considered against alternative options involving the retention, repurposing, refurbishment and/or re-use of the existing building/s
- 12.21 Part F of Policy CC2 also states that where it is demonstrated to the Council's satisfaction that the partial or full demolition of existing building/s is justified, The Applicant will be required to submit a pre-demolition audit.
- 12.22 LBC Draft New Local Plan Policy CC4 (Minimising Carbon Emissions) notes that the Council will seek to ensure that all development minimises carbon emissions over the lifespan of the building. In doing so, the Council will require applicants for all new development and all development proposing substantial demolition to submit a whole life carbon emissions assessment and demonstrate that they have done all they can to minimise carbon emissions over the lifespan of the buildings, targeting the GLA Whole Life Carbon benchmark modules B-C.

12.23 LBC Draft New Local Plan Policy CC5 (Energy Reduction in Existing Buildings) sets out criteria (i-vi) in which the Council will seek when supporting adaptations and improved to existing buildings to make them more energy efficiency and reduce the energy needed to occupy the building.

Assessment

12.24 An Energy and Sustainability Statement has been prepared by Sweco in support of this application.

12.25 The key sustainability measures proposed include:

- i Improved building design which seeks to expand the commercial space of the building
- ii 100% electric HVAC building services solution and utilising PV installation at roof level
- iii The Proposed Development Provides >1,120 sq m of additional planting across roofs and terraces, significantly improving site greening and biodiversity.
- iv Significant improvements to sustainable transport facilities with cycle spaces and showers.
- v Building Regulations Part L 2021 site-wide carbon emissions reductions of 27% at 'Be Green' stage of the Energy Hierarchy.
- vi Building Regulations Part L 2021 site-wide carbon emissions reductions of 19% at 'Be Lean' stage of the Energy Hierarchy.
- vii 75% of existing structure retained.
- viii Greywater harvesting systems included within the design

Energy

12.26 A combination of innovation and best practice energy reduction measures have been applied to the Proposed Development. This has resulted in an overall reduction in regulated emissions of 27%.

12.27 Section 1.3 of the Energy and Sustainability Statement, prepared by Sweco, sets out the carbon offset payment resulting from the shortfall in the proposed reduction of regulated emissions achieved at the site. The offset has been calculated at £340,605, in line with the London Plan.

12.28 In terms of the 'Be Lean' component, a range of energy-efficient passive design measures are proposed for the development:

- Locating delivery, and servicing routes away from heavily pedestrianised areas, and cyclist routes.
- Locating intakes of air supply as far as possible from pollution sources.
- A central atrium which aids in maximising daylight provision for the lower levels.
- Average solid-to-glazing ratio of 55% across different façades.
- The upper levels will have external vertical fins ranging from 150 mm to 300 mm to address solar exposure.
- Reduced water usage using low flow water outlets and appliances

12.29 In relation to the 'Be Clean' element, the Proposed Development includes the use of four pipe Air Sourced Heat Pumps to serve the buildings heating and cooling demand. At present, there is no proposed District Heat Network in close enough proximity and therefore there is no connection proposed. However, the energy strategy will allow for a potential connection to a suitable network if one was to be developed in the future.

12.30 In regard to 'Be Green', Air Source Heat Pumps (ASHP) and Solar Panels are proposed. ASHP can serve multiple zones in a building, each with different heating and cooling requirements which can be distributed on demand. Solar PVs will be installed at roof level to serve the landlord within the building, as follows:

- 113 PV panels over circa 150 sq m.

- 12.31 Based on the current design, the PVs generation profiles would be likely compatible with the building's electric load, and the share of electricity produced on-site is relatively small. Energy storage by means of batteries is not considered for this development. This is positive as it will eliminate the environmental costs related to battery manufacturing, and end of life disposal, for the benefit of building's sustainability.
- 12.32 The GLA's 'Be Seen' spreadsheet with performance indicators, including contextual data, building energy use and carbon emissions for the Proposed Development has been submitted as part of the application.
- 12.33 The energy performance of the Proposed Development has been assessed using a CIBSE TM54 compliant methodology to provide an assessment of regulated and non-regulated energy consumption.
- 12.34 A comprehensive NABERS Design for Performance assessment would be carried out at a later stage of design development.

Whole Life Carbon Assessment

- 12.35 In line with the requirements of LBC CPG 'Energy Efficiency and Adaptation' (2021) a Whole Life Carbon Assessment (WLCA) has been prepared by Sweco and submitted in support of this application. The WLCA sets out opportunities for how embodied carbon can be reduced within the Proposed Development. This would be subject to detailed design.
- 12.36 The following principles have been adopted to reduce embodied carbon:
- 75% of existing structures and floors are to be retained;
 - Use of precast panels for efficient installation and design flexibility;
 - Use of brass coloured fins provide solar shading and reduce glare;
 - Incorporate flexibility into the commercial floor plates which can be proportionally divided into two or three tenancies;
 - Reduction of emissions associated with transport.
- 12.37 The current analysis results in the following estimates:

- Upfront carbon [A1-A5] 783 kgCO₂e/m² GIA
- Whole life-cycle embodied [A-C excl. B6&B7] 1,380 kgCO₂e/m² GIA.
- Whole life-cycle carbon [A-C incl. B6&B7] 2,017 kgCO₂e/m² GIA

12.38 The approach to WLCA is therefore in line with regional and local planning policies.

BREEAM

12.39 Pre-assessments demonstrate that the scheme is targeting an ‘Excellent’ rating with a score of 79.97%.

Urban Greening Factor

12.40 The Site is anticipated to achieve an Urban Greening Factor of 0.25 (see DAS page 154).

12.41 It is recognised that this falls below the London Plan target of 0.3 (Policy G5). This shortfall is considered acceptable in this instance as it has been demonstrated that the greening has been maximised at The Site. This has been done through:


- The proposal of a biodiverse roof;
- Planting on all terraces including trees on selective floors; and
- A mix of native and non-native species for climate resilience.

12.42 The Applicant will continue to actively seek and implement future opportunities to improve the UGF score as the design development progresses.

Circular Economy

12.43 In line with London Plan Policy SI7, a Circular Economy Statement prepared by Sweco UK has been submitted with this application. The Circular Economy Statement outlines the circular economy measures that are being targeted within the Proposed Development.

12.44 An innovative approach is being taken to minimising waste and carbon emissions through deconstruction and construction, identifying opportunities to reuse, recycle and upcycle



building materials. A target of 95% of demolition, excavation and construction materials will be diverted from landfill, 90% of materials will be reused or recycled from demolition and strip out and 30% disassembly potential with reuse at end-of-life.

12.45 The Proposed Development therefore complies with planning policy at all levels in respect of energy and sustainability.

13 Transport, Waste and Servicing

- 13.1 This chapter assess the proposed transport and associated servicing arrangements against the relevant planning policy and guidance documents.

National Planning Policy

- 13.2 Chapter 9 of the NPPF sets out the Government's policies relating to sustainable transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to wider sustainability and health objectives.
- 13.3 One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. Paragraph 109 states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a genuine choice about how they travel.
- 13.4 Paragraph 110 states that planning policies should support a mix of uses across an area so that people can be encouraged to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. In addition, attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking should also be provided.
- 13.5 Paragraph 114 notes that opportunities to promote sustainable transport modes should be encouraged, and that safe and suitable access to The Site can be achieved for all users.
- 13.6 Paragraph 109 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes, offering a genuine choice of transport modes. This can help to reduce congestion and emission.

Regional Planning Policy

- 13.7 Policy T1 (Strategic Approach to Transport) of the London Plan confirms that all development should make the most effective use of land, reflecting its connectivity and accessibility by

existing and future public transport, walking and cycling routes, ensuring that any impacts are mitigated.

- 13.8 Policy T4 (Assessing and Mitigating Transport Impacts) of the London Plan assessing and mitigating transport impacts, requires that when required, transport assessments should be submitted with development proposals to fully assess impacts on transport networks.
- 13.9 Policy T5 (Cycling) of the London Plan requires development proposals help to remove barriers to cycling and create healthy environments in which people choose to cycle. This can be achieved through the provision of cycle parking in accordance with the minimum standards.
- 13.10 Policy T6 (Car parking) of the London Plan restricts car parking in line with levels of existing and future public transport accessibility and connectivity. Appropriate disabled persons parking for Blue Badge holders should however be provided, as set out in Policy T6.5 (Non-Residential Disabled Persons Parking).
- 13.11 Policy T6.2 (Office parking) of the London Plan provides the maximum parking standards that should be applied to new office developments. The supporting text states that the management of parking that is provided should ensure that employees and visitors are encouraged to use non car modes of transport as much as possible.

Local Planning Policy

- 13.12 At a local level, LBC Local Plan Policy T1 (Prioritising Walking, Cycling and Public Transport) will seek to ensure developments improve the pedestrian environments by supporting improvements to the pedestrian environment. The delivery of improved walkways, wide pavements and safe and permeable developments is supported.
- 13.13 Policy T2 (Parking and Car-Free Development) (h) states that LBC will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within LBC's Transport CPG (2021).

13.14 LBC Local Plan Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free.

13.15 In January 2021 LBC adopted their 'Transport' CPG which provides information on all types of detailed transport issues within the borough.

Emerging Local Planning Policy

13.16 LBC Draft New Local Plan Policy T2 (Prioritising Walking, Wheeling and Cycling) notes that the Council will promote active travel by prioritising walking, wheeling and cycling in the borough, to improve health and wellbeing, reduce harmful emissions, improve air quality, help to tackle climate change and deliver sustainable communities.

13.17 LBC Draft New Local Plan Policy T5 (Parking and Car-free Development) advises that the Council will limit the availability of parking and require all new developments in the borough to be car-free, to reduce car ownership and vehicle use and encourage the use of alternative, sustainable modes of travel.

Assessment

13.18 The following transport documents have been prepared by Waterman in support of this application:

- i. Transport Assessment;
- ii. Framework Travel Plan;
- iii. Draft Construction Management Plan; and
- iv. Operational Waste Management Strategy.

13.19 The transport proposals in regard to both the construction and operational side of the development are summarised in turn below.

Construction

13.20 This application is supported by a draft Construction Management Plan (CMP) prepared by Waterman in line with LBC’s CMP proforma. The draft CMP identifies and outlines measures to minimise construction impacts. A full CMP would be prepared in consultation with neighbours and submitted for approval from LBC following the receipt of planning permission.

Operational

13.21 This application is supported by a Transport Assessment prepared by Waterman, which identifies and outlines the transport proposals once the development is operational.

13.22 The Assessment outlines the results of a multi-modal trip generation assessment for employees of the Proposed Development. Table 11 of the TA summarises the daily user trip generation figures at both AM and PM Peak hours for different modes of transport

13.23 The Transport Assessment concludes that in all cases, the forecast trip generation can be accommodated within the existing transport network capacities.

Cycle Parking

13.24 The Proposed Development would result in the following secure cycle parking provision:

Type	Existing	Proposed	Uplift
Long Stay	140	452	+312
Short Stay	0	16	+16
Total	140	468	+328

13.25 All the long-stay cycle parking spaces would be secure, lit and covered and access to the long-stay cycle store would be via a Dutch style stair ramp from Phoenix Street.

13.26 Due to the limited public realm, the retail short stay cycle parking provision would be accommodated in the local vicinity. It is anticipated that a financial contribution for the delivery of these spaces would be agreed as part of the s106 agreement.

Car Parking

13.27 The Proposed Development would be car free with the basement vehicular ramp and car park (21 spaces) to be removed to offer extensive improvements to the basement in terms of trip end facilities (cycle parking, changing rooms, showers and lockers) and a redesigned loading bay.

Travel Plan

13.28 In relation to pedestrian access, the primary access to The Site will be retained from Charing Cross Road. The access will lead into the main reception area. There will be step free access for employees and visitors with mobility issues. A secondary pedestrian access will also be provided to the rear of the building via Stacey Street.

13.29 The employees cycling would access The Site via a dedicated ramp (and a LCDS compliant cycle lift) from Phoenix Street, which would facilitate access to the cycle store in the basement.

13.30 Delivery, servicing and waste vehicles could access the dedicated on-site loading bay which will be accessed from Stacey Street. The Proposed Development is car-free in nature so no car parking spaces are proposed.

13.31 The submitted Framework Travel Plan also details how the Travel Plan would be managed once The Site is operational. It is expected that the submission of a Full Travel Plan would be required via a Section 106 agreement.

13.32 The submitted Framework Travel Plan ensures that the Proposed Development complies with planning policy at all levels in terms of travel planning.

Servicing

Regional Planning Policy

- 13.33 London Plan Policy S17 seeks to reduce waste and increase material reuse, recycling and reduction in waste. Developments should be designed to have separate collection of dry recyclables and food.
- 13.34 Policy T7 of the London Plan specifically deals with deliveries, servicing and construction.

Local Planning Policy

- 13.35 Local Plan Policy T4 states that the council will promote the sustainable movement of goods and materials. Policy CC5 outlines that the Council will seek to make LBC a low waste borough, particularly by ensuring that developments include facilities for the storage and collection of waste and recycling.
- 13.36 Policy CC5 (Waste) of LBC's Local Plan outlines that LBC will seek to make Camden a low waste borough by ensuring that developments include facilities for the storage and collection of waste and recycling.

Emerging Local Planning Policy

- 13.37 LBC Draft New Local Plan Policy T6 (Sustainable Movement of Goods, Services and Materials) Part B advises that where developments are likely to generate significant movement of goods, services or materials by road (both during construction and operation), applicants will be expected to minimise the impact of freight via road by prioritising use of the Transport for London Road Network or other major roads, accommodate goods vehicles on site and provide Construction Management Plans, Delivery and Servicing.

Assessment

- 13.38 A Delivery and Servicing Management Plan (DSMP) has been prepared by Waterman and is submitted in support of this application.

- 13.39 As part of the proposals, all commercial servicing and all refuse collection would take place from a new off-street service yard entrance accessed directly from Stacey Street to the south of the New Compton Street junction and the new pedestrian walkway.
- 13.40 The off-street service yard has been designed to accommodate two large vehicles, including a 7.5m box van and a 10m refuse vehicle. In addition, there is space for two cargo bikes when the refuse vehicle bay is unoccupied.
- 13.41 It is expected that most delivery and servicing vehicles will be Ford Transit Custom or cargo bikes and therefore can be accommodated within the loading bay. The loading bay has been designed to provide sufficient space for delivery vehicles to open rear doors and unload.
- 13.42 The Proposed Development is expected to generate an increase of 20 deliveries or visits by servicing vehicle a day. This equates to just over an additional delivery or visit by servicing vehicle every hour which is expected to be accommodated within the on-site loading bay.
- 13.43 It is anticipated that delivery timing restrictions would be self-enforcing as most delivery drivers operate in the day outside of the peak hours to avoid the busiest times. Therefore, it is anticipated most deliveries will be undertaken outside of peak hours. Night term deliveries (after 10pm and before 6am) will not be permitted to avoid impacting on surrounding residential units.
- 13.44 Personal deliveries to The Site would be discouraged. There are Amazon Lockers nearby to the south of The Site along Charing Cross Road. The possibility of providing Amazon Lockers within The Site will be explored by The Applicant. This would reduce the number of deliveries to The Site.
- 13.45 The DSMP also includes a swept path analysis which demonstrates that vehicles can independently manoeuvre into the loading bay within the service yard.
- 13.46 Therefore, the DSMP confirms that the Proposed Development would comply with planning policy at all levels in terms of servicing and deliverables.

Construction Waste

Assessment

13.47 Diversion from landfill targets would achieve the proposed requirements of 95% of construction waste diverted from landfill with aspirations to achieve over this. The targets set for the Proposed Development in respect of diversion of resources from landfill are more onerous than those required by the BREEAM Version 6 assessment, which only requires 80% by tonnage construction waste / 90% by tonnage of demolition waste to be diverted from landfill. In addition, the GLA diversion from landfill targets are set at 95%. This demonstrates the strong intent of the project to manage waste associated with construction sustainably and in accordance with current best-practice.

Operational Waste

Assessment

13.48 An Operational Waste Management Strategy has been prepared by Waterman and is submitted in support of this application.

13.49 The loading bay would be used to store the wastes arising from all uses, with all users sharing bins. There will be additional storage provision at basement level for use in the event of missed collections. Weigh scales will be used to record each tenant's waste arising.

13.50 Daily collection of wastes is proposed (Monday to Friday). There will be sufficient storage capacity to hold two days' worth of waste to provide contingency, in case of missed collection. The contingency bins will be brought up to ground level using the nearby goods lift if required. A wheeled bin press will be used of residual waste and recyclables bins to reduce the number of bins to be serviced each day, a second will be located in the basement.

13.51 The number of waste bins proposed as follows:

Basement Level

- 1,280 Litre Mixed Dry Recyclable (MDR) Bins - 6

- 1,100 Litre Residual Waste Bins – 1

Loading Bay

- 1,280 Litre Mixed Dry Recyclable (MDR) Bins - 7
- 1,100 Litre Residual Waste Bins – 2
- 240 Litre Food Waste Bins – 18

13.52 The loading bay would also have space to store waste cooking oils (barrels or other containers held in bunded equipment), and glass (240 litre bin) is appropriate based on food and beverage tenant business.

13.53 Therefore, the Operational Waste Management Plan confirms that the Proposed Development would comply with planning policy at all levels in terms of waste collection and management.

Conclusion

13.54 In terms of transport, servicing and deliveries and waste the Proposed Development complies with planning policy at all levels.

14 Amenity

- 14.1 This section assesses the potential effects of the Proposed Development in terms of amenity, which includes wind and microclimate, air quality, noise, and daylight/sunlight.

Air Quality

Planning Policy

- 14.2 At a national level, Paragraph 191 of the NPPF advises that planning decisions should ensure that development is located appropriately. Development proposals should consider the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of The Site or the wider area to effects that could arise from development. In pursuance of this, development proposals should mitigate and reduce to a minimum any potential adverse effects upon amenity.
- 14.3 The NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution (Paragraph 180).
- 14.4 London Plan Policy SI 1 (Improving Air Quality) states development proposals must be at least air quality neutral and should not:
- a) Lead to further deterioration of existing poor air quality;
 - b) Create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;
 - c) Create unacceptable risk of high levels of exposure to poor air quality.
- 14.5 Policy CC4 (Air Quality) of LBC's Local Plan requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution.

- 14.6 CPG: Amenity (January 2021) states that all of LBC is a designated Air Quality Management Area (AQMA) due to the high concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀). As such all developments are to limit their impact on local air quality.
- 14.7 CPG: Air Quality (January 2021) states that the Council's overarching aim is for new development to be 'air quality neutral', not lead to further deterioration of existing poor air quality and, where possible, to improve local air quality ('air quality positive').
- 14.8 LBC has, since 2000, been designated an AQMA. The LBC Clean Air Action Plan (2023-2026) sets out a variety of actions to help reduce key air pollutants in the Borough arising from road traffic, gas boilers and other sources. The plan seeks to minimise emissions from the construction and operation of new developments by requiring developers to adhere to current and any superseding best practice guidance and supplementary planning guidance.

Emerging Local Planning Policy

- 14.9 LBC Draft New Local Plan Policy A3 (Air Quality) requires all major development to submit an Air Quality Assessment. Further, Part iii of Policy A3 requires all development to use design solutions to reduce exposure to existing poor air quality and address local problems of air pollution.

Assessment

- 14.10 An Air Quality Assessment, including an Air Quality Neutral Assessment, has been prepared by TetraTech and submitted alongside the application.
- 14.11 The Site falls within the Camden Air Quality Management Area (AQMA) which is borough wide and boarded by the Westminster AQMA.
- 14.12 During the construction phase, site-specific mitigation measures have been proposed. With these in place, the risk of adverse effects due to dust emissions from the construction phase will not be significant. During the operational phase, as the Proposed Development is anticipated to be car free in nature, the predicted change in traffic flows fall below EPUK/IAQM Land-Use Planning Guidance and therefore a detailed dispersion modelling assessment for the operational phase was deemed unnecessary.

14.13 The Air Quality Neutral Assessment considers the emissions of atmospheric pollutants from the development at source and compares the emissions with the benchmark levels that define neutrality. The development trip is below the benchmark trip rate and therefore the development can be considered Air Quality Neutral for building and transport emissions.

14.14 Therefore, the Proposed Development is compliant with adopted policy at all levels in terms of air quality.

Noise

National Planning Policy

14.15 The NPPF contains guidance on noise management in planning decisions. Paragraph 191 states that the outcome of planning decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of the development and mitigate noise impacts. This paragraph contains recognition that development will 'often create some noise'.

Regional and Planning Policy

14.16 London Plan Policy D14 (Noise) places the responsibility for mitigating impacts from existing noise on the proposed new development. New noise and nuisance-generating development proposed close to noise sensitive uses should put measures in place to mitigate and manage any noise impacts.

14.17 Policy A4 (Noise and vibration) of Camden's Local Plan is clear that the Council will seek to ensure that noise is controlled and managed, and that development should have regard to LBC's Noise and Vibration Thresholds.

14.18 Policy A5 of the Local Plan outlines that planning permission for noise generating development will only be granted if it can be operated without causing harm to amenity. The Council will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.

Emerging Local Plan Policy

14.19 LBC Draft New Local Plan Policy A4 (Noise and Vibration) states that the Council will seek to ensure that noise and vibration is controlled and managed to avoid significant adverse impact on health and quality of life. In assessing applications, the Council will have regard to the noise and vibration thresholds set by LBC, and other relevant national and regional policy and guidance and British Standards.

Assessment

14.20 The Noise Impact Assessment, prepared by Hann Tucker Associates assesses the potential noise effects from the plant equipment upon noise sensitive receptors.

14.21 Calculations ran by Hann Tucker indicate that the proposed ASHP units, in conjunction with the proposed mitigation measures, should be capable of achieving LBC's atmospheric plant noise emission requirements. Mitigation measures include an acoustic enclosure around the proposed ASHP units, whilst perimeter screening will have acoustic louvres with doors, access panels and service penetrations to be treated so as to maintain the acoustic performance of the assembled screen.

14.22 The Proposed Development also includes Class E Retail uses at the ground floor. Measures would be implemented to ensure the protection of residential amenity from noise including acoustic attenuation measures (such as sound insulation and self-closing doors) and good management practices (such as the control of music/loudspeaker systems and delivery hour restrictions).

14.23 Subject to mitigation, the proposals are therefore considered to comply with planning policy relevant to noise.

Daylight and Sunlight

Planning Policy

14.24 Policy A1 (Managing the Impact of Development) of Camden's Local Plan seeks to protect daylight/sunlight values within existing and Proposed Development. The supporting text (Paragraph 6.5) states that in assessing daylight/sunlight values LBC will consider the most recent guidance published by the Building Research Establishment.

14.25 The Building Research Establishment (BRE) Site Layout Planning for Daylight and Sunlight (2022) provides guidance and advice on site layout planning to achieve good sun lighting and daylighting, both within building and in the open spaces between them.

14.26 CPG: Amenity (January 2021) provides further detail on LBC's expectations from development proposals in terms of effects on daylight and sunlight receipt to neighbouring and surrounding properties.

Emerging Planning Policy

14.27 LBC Draft New Local Plan Policy A1 (Protecting Amenity) Part B notes that when assessing planning applications, the Council will consider sunlight, daylight and overshadowing. Paragraph 13.9 (supporting text) states that to assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment.

Assessment

Daylight and Sunlight

14.28 In line with adopted Local Plan Policy A1, Daylight and Sunlight Report, addressing the Proposed Development's impact on neighbouring properties and prepared by GIA has been submitted in support of the application. The technical analysis has been undertaken in accordance with the BRE Guidelines (2022). The report identifies the relevant neighbouring properties and assesses four scenarios: 1) the existing site vs the proposed; 2) the existing site vs cumulative schemes in close enough proximity to cause cumulative effects to neighbours; 3) future receptors and 4) historic planning permission (ref: 2016/5202/P) vs proposed.

Existing vs Proposed Scenario

14.29 As set out in paragraph 1.4 of their report, GIA have assessed 18 properties relevant for daylight and sunlight assessment surrounding the Site. When assessed against the sunlight and daylight

methodologies within the BRE Guidelines, the scheme presents the following level of compliance in the 'Existing Site vs Proposed' scenario

- i. VSC: 514/634 windows meet BRE **(81.1%)**
- ii. NSL: 230/268 rooms meet BRE **(85.8%)**
- iii. APSH: 163/202 windows meet BRE **(80.7%)**.

14.30 Table 01 of GIA's report illustrates that of the 120 apertures which fall short of BRE recommendations for VSC; 50 will experience alterations of between 20.1%-29.9%, 31 would experience alterations of between 30%- 39.9% and that 39 apertures would experience reductions of 40%+.

14.31 Paragraph 1.6 of the same report goes on to state that, of the 38 rooms which fall short of BRE recommendations for the NSL methodology; 13 rooms would experience reductions between 20.1%-29.9%, 7 rooms would experience reductions between 30%-39.9% and 18 rooms would experience NSL reductions of 40%+.

14.32 When assessed for sunlight (APSH) paragraph 1.7 confirms that, of the 39 apertures which fall short of the BRE recommendations, 35 are located to the north of the site within 1A Phoenix Street and 1-2 St Giles Passage where the architecture features of the building contain projecting balconies and flank elevations which self-limit sunlight enjoyment. The remaining four apertures which experience losses beyond BRE recommendations are located within Phoenix Theatre (one aperture) and 1-8 The Alcazar (three apertures).

14.33 Owing to the Site's location in an inner London urban environment, coupled with the narrow separation distances between neighbouring properties, as set out in paragraph 1.8 of the Daylight Sunlight Report, GIA consider that the overall compliance level of +80% for daylight and sunlight illustrates a **"very good level of compliance in a dense urban environment"**.

14.34 Paragraph 1.8 goes on to state that, where there are apertures or rooms that fall short of the BRE Guidance, factors such as low existing daylight / sunlight values, projecting balconies, flank elevations and narrow separation distance, means that any change from the existing building envelope, has the potential to create a disproportionate change in percentage terms from the base amenity value.

Historic Permission vs Proposed Scenario

- 14.35 As previously set out in this Statement, the Site has been the subject of an historic planning permission (ref: 2016/5202/P) which was not implemented. GIA have been engaged, alongside the Design Team, to ensure that the forthcoming development proposals have minimal additional daylight and sunlight impacts beyond the previous planning permission.
- 14.36 Paragraph 1.10 of the Daylight and Sunlight Report confirms that GIA have completed a supplementary assessment to understand the level of compliance this scheme would have against GIA's updated model and more accurate internal layouts to ensure a 'like for like' comparison. Their analysis provided the following comparison levels:
- i. VSC: 539/634 windows meet BRE **(85%)**;
 - ii. NSL: 238/268 rooms meet BRE **(88.8%)**; and
 - iii. APSH: 174/202 windows meet BRE **(86.1%)**.
- 14.37 Whilst GIA have found that the Historic Permission does perform better than the Proposed Development, the actual changes are considered de-minimis. Table 03 illustrates the actual VSC changes of the 634 apertures between the two permutations.
- 14.38 GIA's analysis shows that 17.5% of all apertures assessed would see a betterment or no change in VSC between the Historic Permission and Proposed Development. Moreover 82% of the apertures would experience a VSC change limited to 2% or less. Finally, just 0.5% of all apertures assessed would see an actual reduction in VSC between 2.1% - 3% (D&S Report, paragraph 1.12).
- 14.39 As set out in paragraph 1.13 of their report, GIA do not consider that such additional de-minimis changes would be noticeable beyond the Historic Permission.

Existing vs Cumulative

- 14.40 This scenario considers the effect of the Proposed Development in conjunction with cumulative schemes in close enough proximity to cause cumulative effects to neighbours. The cumulative scheme considered was 104-110 Charing Cross Road (planning permission ref: 2018/0403/P).

14.41 GIA's report confirms that there will be no cumulative effects to the following neighbours as a result of the nearby approved scheme at 104-110 Charing Cross Road:

- i. Trentishoe Mansions (GIA report, paragraph 4.26);
- ii. 3-5 Earlham Street (GIA report, paragraph 4.113); and
- iii. 148-150 Shaftesbury Avenue (GIA report, paragraph 4.126).

14.42 Paragraph 1.14 of the same report confirms that the technical analysis identifies that 33 apertures from the other properties assessed will experience additional VSC reductions, however 32 are limited to 0.1% and one aperture experiences a 0.2% change. When assessed against sunlight, six apertures will experience a small additional reduction in APSH.

Future Receptors

14.43 This scenario considers the effect of the Proposed Development upon the future receptors at 104-110 Charing Cross Road.


14.44 The technical analysis has identified that all proposed rooms would continue to meet the relevant daylight and sunlight targets post implementation of the Proposed Development (D&S Report, paragraph 1.15).

Daylight and Sunlight Conclusion

14.45 Overall, as presented in the submitted Daylight and Sunlight Report, GIA believe the existing v proposed results illustrate a “**very good level of overall BRE compliance**” (+80%) for a site in an inner London location. Whilst there are additional reductions in daylight & sunlight beyond the Historic Permission, any such changes are highly unlikely to be noticeable to the occupants using the space and therefore, GIA do not consider the level of harm to be unacceptable.

Overshadowing

14.46 In terms of overshadowing, as set out in paragraphs 5.19-5.21 of the Daylight and Sunlight Report, two of the three existing amenity areas achieve strict BRE compliance. The one remaining amenity space is a small south facing terrace within 1A Phoenix Street. When this space is assessed against the historic permission, the Proposed Development creates marginally more direct sunlight on the spring



equinox (21st March) producing a betterment in sunlight enjoyment. Of the two future amenity areas located at 104-110 Charing Cross road, one area (A5) breaches guidance however, the absolute loss is just 0.01 square metres, which won't be noticeable. The remaining area (A6) will meet BRE guidance.

15 Other Material Considerations

15.1 This section assesses the development against other relevant material planning considerations. These are as follows:

- a) Basements;
- b) Archaeology;
- c) Trees;
- d) Fire; and
- e) Health.

Basements

Planning Policy

15.2 Local Plan Policy A5 advises that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a. neighbouring properties;
- b. the structural, ground, or water conditions of the area;
- c. the character and amenity of the area;
- d. the architectural character of the building; and
- e. the significance of heritage assets.

15.3 Guidance for basement development is also provided within LBC's Basement CPG (January 2021). The Guidance outlines that the siting, location, scale and design of basements must have minimal impact on, and be subordinate to, the host building and property.

Emerging Planning Policy

- 15.4 LBC Draft New Local Plan Policy D6 (Basements) notes that when assessing planning applications, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment. They also generally require a Construction Management Plan for basement developments.

Assessment

- 15.5 The Proposed Development includes new piled foundations and localised slab lowering within the basement (see Section 5.2 of the Structural Statement, prepared by act II).
- 15.6 The Archaeological Desk-Based Assessment considers that the works are likely to only impact remains of low significance, such as the bases of quarry pits.
- 15.7 In response to part (d) of the policy, the architectural character of the existing building, which is considered to detract from the character and appearance of the surrounding area, will change as a result of the Proposed Development. The minor works to the basement will in part enable the delivery of an improved, high-quality and sustainable architectural character to the Site.
- 15.8 In response to part (c) of the policy, a CMP would be in place during the works to ensure that the effects of the Proposed Development on the amenity of the surrounding area would be mitigated and managed.

Archaeology

National Planning Policy

- 15.9 Section 16 of the NPPF details how to conserve and enhance the historic environment.
- 15.10 Paragraph 196 advises that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment.

15.11 Paragraph 200 notes that LPAs should require applicants to describe the significance on any heritage asset affected, including any contribution made by their setting. It further notes that where development is proposed has the potential to include a heritage asset with archaeological interest, LPAs should require an appropriate desk-based assessment and, where necessary, a field evaluation.

15.12 Paragraph 203 states that when determining applications, LPAs should take account of the positive contribution that heritage asset can make, the desirability of new development making a positive contribution to local character and distinctiveness and the desirability of sustaining and enhancing the significance of heritage assets whilst putting them to viable uses.

Regional Planning Policy

15.13 London Plan Policy HC1 states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation

Local and Emerging Local Planning Policy

15.14 Local Plan Policy D2 Heritage advises that the Council will protect remains of archaeological important by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

15.15 LBC Draft New Local Plan Policy D5 notes the same wording as the currently adopted D2 policy. Supporting text however advises that the Council will consult with, and be guided by, Historic England and the Greater London Archaeology Advisory Service (GLAAS) on the archaeological implications of development proposals.

Assessment

15.16 An Archaeological Desk-Based Assessment (ADBA) has been prepared by MOLA, which seeks to clarify the significance of sub-surface archaeological assets at The Site and to identify The

Site's archaeological potential. The Site is within the Tier 1 'Ludenwic' Archaeological Priority Area.

- 15.17 About 95% of The Site is covered by a basement, which would have removed any archaeological remains within its footprint to a depth of c 4.7m bgl. It is therefore unlikely that any archaeological remains would be present within the footprint of the existing basement.
- 15.18 Outside the footprint of the existing basement, there is a moderate potential for early medieval, later medieval and post medieval archaeological remains. IT is understood that the Proposed Development would not extend into the currently unbasemented area.
- 15.19 The Proposed Development includes new piled foundations and localised slab lowering within the basement, which are likely to only impact remains of low significance, such as the bases of quarry pits.
- 15.20 The Site is therefore considered unlikely to contain archaeological remains of more than low, or possibly medium significance, and in view of the limited potential impacts, further investigation prior to the determination of the planning consent is unlikely to be required.
- 15.21 The assessment concludes that given the location with an APA, Camden's archaeological advisor may request a watching brief during ground reduction to ensure that any surviving archaeological remains are not lost without record. If required, this can be secured by an appropriately worded archaeological condition attached to the granting of permission.

Trees

Planning Policy

- 15.22 Policy G7 of the London Plan states that new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees. Policy G7 adds that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted

that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed.

15.23 Part C of Policy G7 advises that the planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

15.24 LBC Policy A3 is clear that the Council will protect, and seek to secure additional, trees and vegetation.

15.25 Further guidance can also be found in LBC’s Trees CPG (March 2019).

Emerging Planning Policy

15.26 LBC Draft New Local Plan Policy NE3 (Tree Planting and Protection) notes that the Council requires trees and vegetation, that are to be retained, to be satisfactorily protected both during and following the demolition and construction phase of development.

Assessment

15.27 An Arboricultural Report, prepared by Tree:fabrik, has been submitted in support of this application. The Site was visited, and the trees and other vegetation surveyed, referring to the recommendations of British Standard 5837 (2012).

15.28 There are no trees recorded on site and no trees are identified for removal.

15.29 A total of 13 individual street trees were assessed within the survey schedule including 3 category ‘A’ trees (High quality), 7 category ‘B’ trees (Moderate quality) and 3 category ‘C’ trees (Low quality). Given the location of the trees and their relationship to the existing building, no adverse effect on the street trees is anticipated, provided that sufficient precautionary measures are implemented.

15.30 Section 7.7 of the Design and Access Statement discusses the terrace design. The design proposes 15 new trees on the terraces, visible from street views in key points. Each would be

within 800mm deep large planter that will house other plant species. The trees mark corners of the building and provide a continuation of greenery from The Phoenix Garden.

- 15.31 The trees selected are resilient sculptural species well suited to the vertiginous environment.

Fire

Planning Policy

- 15.32 Policy D12 of the London Plan illustrates the importance of fire safety and ensuring the safety of all building users meaning all development proposals must achieve the highest standards of fire safety. Developments should be constructed in an appropriate way to minimise the risk of fire spread, provide suitable means of evacuation and should develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in.

- 15.33 All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

- 15.34 Paragraph 3.12.1 of the London Plan goes on to state that the fire safety of developments should be considered from the outset. Development agreements, development briefs and procurement processes should be explicit about incorporating and requiring the highest standards of fire safety.

- 15.35 Local Plan Policy D5 also requires specific consideration of the requirements for evacuation lifts.

Emerging Policy

- 15.36 There is no relevant emerging policy.

Assessment

- 15.37 The submitted Planning Fire Statement, prepared by The Fire Surgery, sets out the fire safety measures that would be provided within the Proposed Development.
- 15.38 The Planning Fire Statement has evidenced the provisions made for the safety of occupants and protection of the property as well as the provision of suitable access and equipment for firefighting.
- 15.39 Upon completion, the building owners or managers (including tenants) will need to undertake fire risk assessments and have these available for inspection by the Fire Service at any time.
- 15.40 Compliance with planning policy at all levels has therefore been demonstrated in respect of fire safety.

Health

Planning Policy

- 15.41 London Plan Policy GG3 sets out what the GLA requires those involved in planning and development to do to improve Londoner's health and reduce inequalities.
- 15.42 Policy C1 (Health and Wellbeing) of LBC's plan advises that the Council will improve and promote strong, vibrant and healthy communities through ensuring a high-quality environment with local services to support health, social and cultural wellbeing and reduce inequalities. In addition, measures that will help contribute to healthier communities and reduce health inequalities must be incorporated in a development where appropriate.
- 15.43 Policy C1 also outlines that the Council would require development to positively contribute to creating high quality, active, safe and accessible places. Proposals for major development schemes should also include a Health Impact Assessment (HIA)

Emerging Local Planning Policy

15.44 LBC Draft New Local Plan Policy SC1 (Improving Health and Wellbeing) Part B notes that the Council will require development to be designed to promote good health and wellbeing, minimise adverse impacts on health and wellbeing and reduce health inequalities. Development should also support healthy and active lifestyles, be safe and accessible for all and promote social and economic inclusion. Part C of Policy SC1 advises that HIAs must be undertaken for all major applications.

Assessment

15.45 The Health Impact Assessment (HIA) prepared by Ekosgen summarises the impact of the Proposed Development both during construction and operation against health determinants.

15.46 Section 5 of the Assessment presents recommendations at The Site for improving outcomes during construction and operation. These include:

Construction

- i. Implement mitigation measures and best practice management practices highlighted in the Noise Impact Assessment; and
- ii. Implement mitigation measures as set out in the Air Quality Assessment and Construction/Demolition Management Plan.

Operation

- i. Disabled parking space provision to be negotiated as part of a S106 agreement; and
- ii. Implement measures set out in the Employment and Skills Strategy.

15.47 Therefore, the Proposed Development is considered to comply with planning policy at all levels in respect of health outcomes.



16 Planning Obligations

- 16.1 On 6 April 2010 the Community Infrastructure Levy (CIL) Regulations 2010 came into force. The regulations require all planning obligations to be:
- i. necessary to make the development acceptable in planning terms;
 - ii. directly related to the development; and
 - iii. fairly and reasonably related in scale and kind to the development.
- 16.2 Paragraph 154 of the NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Paragraph 56 echoes the requirements set out in points i-iii above.
- 16.3 The supporting text of Policy C2 (Community facilities) of Camden’s Local Plan (Paragraph 4.26) states that LBC will seek Section 106 planning obligations, where it is legitimate to do

so, to ensure that the additional demand development places on existing community infrastructure and services is met.

- 16.4 The Proposed Development would give rise to a CIL payment, to help fund the provision of physical and social infrastructure in Camden. The CIL payment is proposed to be paid in instalments in accordance with LBC's instalment policy.
- 16.5 Further guidance on planning obligations and CIL contributions is provided in Supplementary Planning Guidance (SPG) and Documents (SPDs) adopted by the Mayor of London and Council, respectively.

Developer Contributions

- 16.6 The Developer Contributions CPG (March 2019) sets out how LBC will use Section 106 Contributions and CIL to fund key infrastructure across the Borough. The guidance states that financial contributions will be sought in respect of affordable housing, open space and infrastructure to address the site specific and related impacts of development which may include financial, and non-financial contributions. Detailed guidance for calculating specific financial obligations is set out within the relevant CPGs.

Draft Heads of Terms

- 16.7 It is envisaged that the following planning obligations would be secured via the Section 106 Agreement between LBC and the Applicant:
- i. A Payment-in-Lieu to be agreed through a financial viability analysis directed towards the delivery of affordable housing by the Council, preferably on a Council owned site;
 - ii. Affordable Workspace ;
 - iii. Car Free Development;
 - iv. Demolition Management Plan;
 - v. Construction Management Plan;
 - vi. Deconstruction and Construction Management Plan Bond;
 - vii. Delivery, Service and Waste Management Plan;
 - viii. Employment and training plan;
 - ix. Energy and Sustainability plan;
 - x. Highways Works;

- xi. Local Employment requirements, including jobs for Camden residents, apprenticeships, and work experience placements;
- xii. Local Procurement;
- xiii. Pedestrian, Cycling and Environmental Contribution
- xiv. Open Space Contribution; and
- xv. Travel Plan and Travel Plan monitoring contribution

17 Summary and Conclusions

- 17.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. This Planning Statement has assessed the Proposed Development against the development plan and other relevant planning policy and guidance at national, regional, and local policy level.
- 17.2 The Proposed Development has been subject to thorough pre-application discussions with local residents, businesses, LBC and other interested parties. The Applicant has always sought to consider, and where possible incorporate, the responses received.
- 17.3 The Proposed Development, designed by DSDHA comprises high quality, sustainable commercial space in the heart of Central London. This building would reconnect Old and New Compton Street whilst providing safe, inclusive and public realm enhancements for the local community to enjoy.

17.4 The Applicant's vision is to create the most sustainable building of its time and seeks to respond to Camden's ambitions for its borough as set out in the 'We Make Camden' through the delivery of sustainable commercial space, improved public realm, a financial contribution towards off site housing and on-site affordable workspace.

17.5 To summarise, the proposal would deliver the following package of substantial public benefits:

Environmental

- Target circa 75% structural retention;
- On-floor air handling units (AHUs) and heat pump-led 100% electric HVAC systems facilitating long-term operational decarbonisation#
- Provision of photovoltaic panels at roof level (c. 150sqm);
- Fabric-first low-energy design and façade development, including perimeter gains targets and mitigation of overheating;
- Delivering improved permeability across the Site and new connections to the neighbourhoods and communities in the immediately surrounding area. Create greater permeability and safe pedestrian routes through the development, that will increase walkability in the area, including the re-establishment of Little Compton Street and the reduction of anti-social behaviour;
- Greening of the Site and the public realm, increasing access to nature for users, visitors and passers-by. Targeting UGF of 0.25 and BNG of >10%;
- Basement stormwater runoff storage design for 1-in-100 event including 40% climate change and greywater harvesting systems included to reduce potable water consumption combined with low-flow fittings and climate resilient planting;
- Provision of cycle and runner-commuter facilities to encourage sustainable transport options such as cycling and walking to reduce pollution from transport;

- The project would be assessed against the Building Research Establishment Environmental Assessment Method (BREEAM), and will target a minimum rating of Excellent, representing the top 10% of UK new buildings in terms of sustainability. The project will explore opportunities to move towards the highest ratings level, Outstanding;
- Climate change mitigation is a priority for the project, and the building will be designed to minimise 'whole-life' carbon emissions – both in construction and in operation. The building has been designed to target reduction in operational carbon emissions by 27% in comparison to the requirements of Building Regulations Part L, and will be all electric in normal operation, with no fossil fuel combustion on site for space heating or hot water;
- Embodied carbon –The project team are committed to undertaking full life cycle analysis of the project, taking into account the existing building, and using the outcome of the modelling to reduce embodied carbon impacts at each stage;
- The project would seek to divert at least 95% of construction waste from landfill and will seek to retain waste at its highest level of utility, favouring re-use over recycling wherever feasible. A full pre-demolition audit will be completed prior to strip out and demolition, to identify opportunities for reuse and recycling of existing material, either on or off site. Materials Index are engaged to provide the pre demolition audit and help facilitate key elements for harvesting ahead of the soft strip contract period;
- Increase biodiversity through generous terraces at multiple levels and new public realm at ground level, planted to support the Bloomsbury Biodiversity Corridor;
- Provision of external amenity terraces at each level with planting and creation of a planted, terraced internal atrium to bring light and green into the building;
- Creation of two new public spaces – one on Caxton Walk and one on Stacey Street adjacent to The Phoenix Garden, creating a safer, well-lit environment to address existing anti-social behaviour; and

- Transport improvements including exploring the pedestrianisation of Phoenix Street and circulation amendments to Stacey to further reduce traffic speed and improve road safety.

Social

- Re-establishment of historic street, reconnecting Old to New Compton Street;
- Provision of high-quality community space at ground floor level for local community use, overlooking and complementing The Phoenix Garden and the new public realm to be created on this part of The Site.
- Meanwhile uses, including partnership with Bow Arts who are occupying part of the building as affordable art studios for local artists and significant part of the building has been leased to Raise Your Hands who will be creating an immersive theatre within the building;
- Potential to work with Redemption Roasters or Sign Language Coffee Bar or similar to run a future coffee shop within the building;
- Working with local charity, Rhythms of Life, for potentially re using the existing building kitchen equipment to support food for the homeless at St Martins-in-the -Fields;
- Improvement to the public realm, delivering increased safety features to deter anti-social behaviour and activating the street frontages, creating vibrancy and vitality at The Site;
- Encouragement of conviviality and promotion of interaction and integration of tenants through generous shared building amenities;
- Working with community groups, such as Bow Arts for potential collaborations within the Proposed Development;

- Delivering high quality design that responds to and respects the differing characteristics of the facades across The Site and that addresses its sensitive location next door to heritage assets (Phoenix Theatre and former Saville Theatre); and
- Enhancing the setting of Cambridge Circus through a building that responds to the formal qualities of this urban 'set piece'.

Economic

- The creation of a significant number of jobs, including approximately 225 during the construction phase first targeted at Camden residents and then via Central London Forward;
- The creation of a significant number of jobs, including 225 during the construction phase first targeted at Camden residents and then via Central London Forward;
- Approximately £450,000,000 GVA per year through direct and indirect impact during the operation phase including £327,000,000 spent per year within Camden.
- An estimated 3,248 full time jobs throughout London including 2,165 direct on-site jobs in Camden and 1,083 indirect jobs supported across London.
- Affordable workspace provision
- Provision of work placements and apprenticeships during the construction period;
- At this stage, The Applicant does not know who the future tenants will be. However, The Applicant will encourage future tenants to engage with Camden's employment team when jobs arise;
- Delivery of increased and improved flexible office floorspace in a location where planning policy and objectives support and promote the land use;
- Target local recruitment through KXCSC, and Good Work Camden; and
- Maximise the opportunities for local businesses to supply goods and services at the construction phase.

17.6 The Proposed Development meets planning policies at a national, regional, and local level and therefore planning permission should be granted.



Appendix A – Site Planning History

125 Shaftesbury Avenue
PLANNING HISTORY

Date Received	Reference No	Type of Application	Description	Decision	Date of Decision
06/09/2024	2024/3725/P	Full planning permission	Installation of a temporary external steel-framed structure at first floor level for the period of 1 November 2024 to 30 September 2025	Permission granted	09/10/2024
12/04/2024	2024/1444/P	Temporary planning permission	Use of the existing ground floor entrance, first to fourth floors and ninth floor of 125 Shaftesbury Avenue as immersive theatre space, and ancillary events space (sui generis) for a temporary period between 1 September 2024 to 30 September 2025.	Permission granted	15/07/2024
13/09/2018	2018/4188/P	Full planning permission	Installation of new and replacement mechanical plant at first and eighth floor level roofs including: the installation of 3 x double doors; 2 x ventilation louvers in place of windows; 2 x acoustic enclosures to house 3 x IDF room condensers; extract and discharge ducts; 2 x AHU heat pump condensers; 3 x AHU condenser units; 1 x kitchen condenser unit; 1 x AC condenser unit; 1 x freezer condenser; and associated guard rails to eighth floor roof	Permission granted	10/01/2019
26/04/2018	2018/1299/P	Full planning permission	External alterations to the 7th storey roof to include: the installation of 42 x Variable Refrigerant Flow (VRF) units, 4 x Air Handling Units (AHU), stairwell ventilator, and toilet and smoke extraction vents, with associated cable trays and handrails; installation of external door within existing external screen wall; and replacement of existing windows with double access doors; following removal of existing equipment and stair over runs.	Permission granted	26/06/2018

			Installation of 21 Variable Refrigerant Flow (VRF) units within existing enclosure at 10th storey		
16/04/2018	2018/1543/A	Advertisement consent	Display of internally illuminated (lettering only) sign to existing canopy and non-illuminated projecting blade sign at fascia level.	Permission granted	05/06/2018
27/09/2016	2016/5202/P	Full planning permission	Remodelling, refurbishment and extension of existing office building (Class B1) at upper floor levels, roof level and within lightwells to provide 9,682sqm additional floorspace, including terraces, a new public route, a relocated office entrance (Charing Cross Road), rooftop plant and flexible retail uses (Classes A1/A3), along with associated highway, landscaping and public realm improvements.	Permission granted	22/05/2018
26/11/2010	2010/6407/P	Full planning permission	Installation of x 6 condensing units to 7th floor roof space of existing office building (Class B1).	Permission granted	14/01/2011
16/01/2006	2006/0314/P	Full planning permission	Installation of 1x new air conditioning unit adjacent to 6x existing units at 7th floor roof level.	Permission granted	30/03/2006
30/11/2004	2004/5140/P	Full planning permission	The installation of 5x condenser units and 1x satellite dish on the 7th floor roof space.	Permission granted	11/03/2005
22/03/2004	2004/1262/P	Full planning permission	Installation of 2 No. external air conditioning condensers on 1st floor flat roof.	Permission granted	10/06/2004
22/12/2003	2003/2904/P	Full planning permission	Erection of five rooftop satellite dishes.	Application withdrawn	N/A
03/09/2003	2003/2031/A	Advertisement consent	The display of internally illuminated numerals on the building canopy to the ground floor entrance and halo illuminated numerals mounted on stone cladding to one side of the entrance.	Permission granted	22/10/2003
10/07/2003	2003/0472/P	Full planning permission	Siting of 6 external Air-Conditioning Condenser Units on first floor flat roof within fenced enclosure.	Permission granted	27/08/2003

07/02/2002	PSX0204122	Full planning permission	The refurbishment of the existing ground floor offices including the provision of full height glazing and a stainless steel canopy, as shown on drawing numbers; 1248.PL.01 - 1248.PL.13.	Permission granted	14/03/2002
14/12/2000	P13/42/A		Installation of a 60cm channel Mastra Satellite dish	Application Withdrawn by the Council	04/09/2001
15/07/1999	PS9904697	Telecomms/Satellite GDO	The installation of a radio equipment cabin and three panel antennae, mounted on the roof, as shown on drawing numbers 01 to 03.	No objections	10/08/1999
26/05/1998	PS9804478	Full planning permission	The installation of a louvre in a first floor window facing Stacey Street for air handling equipment, as shown by 3 unnumbered A4 sheets and 2 unnumbered A3 sheets and location plan.	Permission granted	29/11/2998
11/08/1998	PS9804757	Telecomms/Satellite GDO	The erection of six pole mounted directional antennae, up to four dish antennae and one equipment cabin with a maximum cubic capacity of 30 cubic metres. (as shown on drawing no. 30/GLN0576/G14/01).	No objection to proposed siting and appearance	27/08/1998
11/06/1997	PS9704550	Full planning permission	The erection of a roof enclosure over a small lightwell at first floor level, as shown by drawing numbers SK03, site plan, C10033/SK08, C10033, 9604130/03, and 4 un-numbered A4 drawings, photographs and Rockwool specification extract.	Permission granted	17/10/1997
05/08/1997	PS9704582R1	Full planning permission	Details of an enclosed service corridor within a lightwell pursuant to condition 7 of an appeal decision dated 25 November 1996, for change of use of the premises to restaurant use, as shown on drawing No: 9604130/01B.	Details approved	22/08/1997
17/06/1997	PS9704582	Full planning permission	The provision of a service corridor within a lightwell in connection with the restaurant use approved on	Application Withdrawn	05/08/1997

			appeal by letter dated 25 November 1996. (Plans submitted).		
23/05/1997	AS9704478	Advertisement consent	Display of two non-illuminated advertisements on the canopy at the corner of Shaftesbury Avenue and Stacey Street; as shown on drawing numbers 95632/4106 and 4107A.	Permission granted	02/07/1997
03/05/1996	P9601380	Full planning permission	Installation of 1.8m diameter satellite dish on 7th floor flat roof; as shown on drawing numbers Plan A, Plan B and on the location plan.	Permission granted	28/06/1996
07/03/1996	P9600702	Full planning permission	Installation of new chiller and pump and new satellite dish at seventh floor level roof; new air handling plant and associated weather louvre at tenth floor level roof; new chillers, pump and plant at eleventh floor (top) roof, as shown on drawing numbers 95632/5003, 0010A, 0011A, 1007C, 1019D, 1200; FHP1802/1009A, 1015A, 1017A, unnumbered drawings of 7th, 10th, 11th and manufacturers details for antennas.	Permission granted subject to conditions	07/06/1996
23/03/1992	9200289	Full planning permission	Extension of fire escape from 119 to 125 Shaftesbury Avenue including new opening door to existing staircase of 125 Shaftesbury Avenue as shown on drawings nos. 92/06/P01 P02; TCCL/1255/1 and two photographs.	Permission granted subject to conditions	15/05/1992
13/05/1988	8800224	Full planning permission	Installation of jib and cradle equipment on the roof as shown on one	Permission granted subject to conditions	10/08/1988
25/03/1988	8880039	Advertisement consent	The display of two sets of internally illuminated numerals one on each side panel of the existing entrance canopy as shown on your unnumbered drawing. Period of consent 1st July 1988 to 31st June 1993.	Permission granted	25/05/1988

05/08/1986	8680208	Advertisement consent	Display of an internally illuminated projecting box sign on the Stacey Street frontage ^as shown on one un-numbered drawing. ^Period of Consent 1st September 1996 to 31st August 1991.	Grant Approval for Advertisement	20/08/1986
15/07/1986	8601305	Full planning consent	Installation of a new shopfront as shown on drawing number 86022/2.	Permission granted	02/09/1986
02/07/1986	8601196	Full planning consent	Installation of a new shopfront. (Plans submitted).	Withdrawn application	N/A
10/04/1986	8600609	Full planning consent	Use as a dry cleaners. ^As shown on two unnumbered drawings. Unit 5, 125 Shaftesbury Avenue.	Permission granted subject to conditions	21/05/1986
05/09/1984	8480180	Advertisement consent	1) The display of an internally illuminated projecting clock measuring 1m x 1m with a height above ground of 2.4m. (2) The display of an oval internally illuminated fascia box sign measuring 1.4m x 1.15m with a height above.	Grant Approval for Advertisement	08/11/1984
27/03/1984	8400474	Full planning consent	The installation of a ground floor frontage as an entrance to the basement restaurant. (As shown on your drawing no: 114 SK 03 & 2 unnumbered illustrations).	Permission granted	31/05/1984
17/03/1978	P13/36X/A/26208	Full planning permission	Development of The Site bounded by Charing Cross Road, Phoenix Street, Stacey Street and New Compton Street and The Site bounded by New Compton Street, Stacey Street, Shaftesbury Avenue, 123 Shaftesbury Avenue and 5 New Compton Street by the erection of a basement an ten storey building for use as shops, showrooms, restaurant and offices together with associated car parking.	Permission granted subject to conditions	03/05/1978

30/05/1975	21063	Permission for development (limited period until 31 July 1976	Use for artists' studios and workshop space.	Permission granted	18/07/1975
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