

Former Saville Theatre, 135-149 Shaftesbury Avenue

Local Planning Authority: Camden

Local Planning Authority reference: 2024/0993/P

Strategic planning application stage 1 referral

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

The proposal

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.

The applicant

The applicant is **YC Saville Theatre Limited**, and the architect is **SPPARC**.

Strategic issues summary

Land use principles: The reinstated theatre would respond positively to London Plan policies which seek to promote and enhance London's cultural offering and visitor attractions. As such, this use is strongly supported by GLA Officers. The hotel use is in line with the strategic function of the CAZ and is supported.

Urban design: The height and scale of the proposed upwards extension has been reduced by 8.36 metres from the submitted scheme and the scale of the extension would now be similar in height to that of the existing building form. The proposal would provide an improved interface to Shaftesbury Avenue.

Heritage: GLA Officers have identified a high degree of less than substantial direct harm to the listed building, as well as a very low degree of less than substantial harm to the setting of adjacent conservation areas and listed buildings.

Other issues relating to **transport, sustainable development, and environment** also require resolution prior to the Mayor's decision making stage.

Recommendation

That Camden Council be advised that the application does not fully comply with the London Plan for the reasons set out in paragraph 68.

Context

1. On 21 March 2024 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. The application is referable under the following Category/categories of the Schedule to the Order 2008:
 - **Category 1C (c):** The building is more than 30 metres high and is outside the City of London.
2. On 29 April 2024 the Deputy Mayor, acting under delegated authority considered the planning report (link to report [here](#))¹ and subsequently advised the Camden Council that the application did not comply with the London Plan for the reasons set out in paragraph 49 of the 29 April 2024 report.
3. On 21 February 2025, the Mayor received documents from Camden Council notifying him of a full resubmission package to the application including amendments to the scheme, as described in this report.
4. The purpose of this update report, which should be read in conjunction with the previously issued planning report GLA/2024/0159 (dated 29 April 2024), is for the Mayor to consider the amendments made and provide Camden Council with an updated statement setting out whether he considers that the application as amended complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
5. Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
6. The Mayor of London's statement of case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

7. The application relates to a historic former theatre building on the northern side of Shaftesbury Avenue, east of Cambridge Circus. The building is Grade II listed and dates from 1930-1, with a brick-and-stucco architecture highly reminiscent of the art deco styles of the period. The original theatre use ceased in the 1960s, after which the building was used as a live music venue before being converted into a two-screen cinema in 1970. In 2001, it underwent further internal remodelling to become a four-screen cinema, which continues to the present day.
8. The building is neighboured to the west and south by office buildings, to the east by a block of flats, and to the rear by the Phoenix community garden. The site is not within a conservation area but is adjoined by the Denmark Street

¹ <https://planapps.london.gov.uk/planningapps/2024-0993-P>

Conservation Area to the north and the Seven Dials Conservation Area to the south. The location benefits from the highest level of public transport accessibility (6b according to Transport for London's methodology) reflecting its central location.



Figure 1 site location.

Details of the revised proposal

9. The proposal would introduce a new theatre alongside a hotel. The development would comprise the excavation of two additional basement levels to accommodate the theatre use, whilst an upward extension of five storeys would accommodate the 211-bedroom hotel. In addition, the listed building would be extensively reconfigured internally, creating a large front-of-house space with a theatre lobby, box office, retail space and bar and restaurant at ground floor level.
10. The main amendment to the scheme relates to the roof extension, which has reduced the parapet height of the building by 8.36 metres whilst refining the design and material palette.

Case history

11. Pre-application meetings were first held with GLA Officers on 21 November 2023 and 20 March 2024. Subsequently a planning application was submitted in March 2024. This application remains under consideration with the London Borough of Camden.
12. A GLA Stage 1 report was issued on 29 April 2024 which set out that the Deputy Mayor considered that the application did not comply with the London

Plan. Whilst the land use principle was supported, the scale and form of the proposed upward extension raised design concerns and a very high degree to loss than substantial harm was identified.

13. In late 2024, the applicant re-started pre-application discussions regarding potential refinements to the scheme. A pre-application meeting was held with GLA Officers on 3 December 2024.

Strategic planning issues and relevant policies and guidance

14. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Camden Local Plan 2017 and the London Plan 2021.

15. The following are also relevant material considerations:

- The National Planning Policy Framework (2024) and National Planning Practice Guidance;
- National Design Guide (2021);
- Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on design, economy, heritage and culture, and transport which can be found on the GLA's website [here](#).²

Land use principles

16. The reinstatement of a theatre would further enhance the cultural offering within the West End, contributing to its ongoing commercial and economic success.
17. Objective GG5 of the London Plan aims to promote and support London's rich heritage and cultural assets, and its role as a 24-hour city. Policy E10 states that the special characteristics of major clusters of visitor attractions and heritage assets and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted.
18. Furthermore, Policy HC5 encourages development proposals which:
 - support the development of new cultural venues in town centres and places with good public transport connectivity; and
 - identify, protect and enhance strategic clusters of cultural attractions.
19. Therefore, London Plan policy supports the promotion and enhancement of London's cultural assets and visitor attractions. The West End theatre district is a key cultural asset to London and this proposal would further enhance this area. As such, the reinstatement of the theatre use is strongly supported.

² <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

20. The new 211-bedroom hotel would also support the strategic function of the Central Activities Zone (CAZ), in accordance with Policy SD4.

Land use principles conclusion

21. The reinstated West End theatre would respond positively to London Plan policies which seek to promote and enhance London's cultural offering and visitor attractions. As such, this use is strongly supported by GLA Officers. The hotel use is in line with the strategic function of the CAZ and is supported.

Urban design

Layout

22. The proposal would provide an improved interface to Shaftesbury Avenue with reintroduced openings providing access to the theatre foyer, box office, and theatre bar. Additionally, lift access is provided to the theatre space directly from Stacey Street whilst access to the hotel would occur from New Compton Street, at the rear of the site. Therefore, it is recognised that the applicant has developed a layout that best responds to the envelope of the Listed Building.

Height, scale, and massing

23. The height of the upward extension has been reduced by 8.36 metres from the submitted scheme which is welcomed. The proposed building would now be similar to that of the existing built form.
24. The elevation fronting Phoenix Gardens represents an improvement to the design.

Architecture and materials

25. A calm approach is required so the upward extension does not compete with the simple proportions and materials of the existing listed building. GLA officers query the effectiveness of the swellings in the facades as they risk competing with rather than complementing existing building features.

Fire safety

26. In accordance with London Plan Policy D12, a revised Fire Statement (dated 31/01/2025) has been submitted with the application, prepared by a suitably qualified fire engineer (OFR Consultants Ltd). The building is more than 18 metres high and the upper floors, comprising the hotel element, would be provided with two escape staircases. The building is also to be provided with one fire evacuation lift in the theatre portion of the building, and one in the hotel portion.

Heritage

27. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on local authorities to have special regard and attention to preserving listed buildings, including their settings, and to preserving or enhancing the character and appearance of Conservation Areas. The NPPF makes clear that when considering the impact of a scheme, any conflict with a heritage asset's conservation should be avoided or minimised. Paragraph 212 indicates that great weight should be given to a heritage asset's conservation. Harm should be clearly and convincingly justified and, if less than substantial, weighed against any public benefits.
28. London Plan Policy HC1 Heritage conservation and growth requires development proposals to conserve significance by being sympathetic to the assets' significance and appreciation within their surroundings and avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process.

Significance

29. The existing building on site, used until recently as the Odeon Covent Garden, is listed Grade II.
30. The site is in the setting of the following designated heritage assets:
 - Church of St Giles in the Fields, listed Grade I and associated lych gate, Vestry Room, listed Grade II;
 - Palace Theatre, listed Grade II;
 - Elms Lester Painting Rooms, 1-5 Flitcroft Street, listed Grade II;
 - Denmark Street Conservation Area (LBC), adjacent to the north; and
 - Seven Dials (Covent Garden) Conservation Area (LBC), adjacent to the south.

Direct impacts

Internal changes

31. The entire remaining interiors and interior structure of the building are proposed to be demolished, along with the rear wall (to be re-erected as a replica with additional windows). This is harmful since the last remaining internal theatre elements from 1931 would be lost. These consist of three secondary and altered staircases, various altered dressing rooms and offices to the rear and the flytower and its contents (including some theatrical machinery). While these are fragmentary, they do collectively contribute something to significance. There are some outline proposals for retention and display of elements of the theatrical machinery and this might be an appropriate mitigation for these elements. The proposed basement would take in (and remove) the existing vaults behind the former stage (north elevation, beneath the pavement); this loss of historic fabric also causes harm. Overall, the loss of the remaining interior elements is considered to cause less than substantial harm at a low level.

External changes

32. The proposals include the removal of most of the rear wall to provide access for the substantial works to provide the proposed new basement theatre. The rear elevation, currently predominantly blank to the southwest, is proposed to be reconstructed with multiple windows for the hotel use. The additional windows here are justified on the basis that these originally existed. In addition, punctuations for additional windows are proposed on the northeast and southwest elevations. The insertion of new windows is considered to cause harm to its character.

Extension on the roof

33. The proposed roof extension is five storeys (plus plant) in height. It is noted that the proposals have been revised since the 2024 submission, with a redesign of the roof extension and a reduction in the proposed total height by 8.36m. The façade retention of the outside wall of the fly tower is now proposed to the rear and north elevation and this is an improvement to the scheme. The extent of direct harm is reduced by these changes.
34. The proposed form which extends as far as, and sometimes beyond, the façade line of the listed building below has the potential to compete with the listed building below.

Conclusion on direct harms

35. The proposals are considered overall to cause a high level of less than substantial harm to the significance of the listed building.

Indirect harm

36. The reduction in height of the proposed roof extension results in a reduced extent of harm (relative to our previous Stage 1) to the settings of all nearby heritage assets, as outlined in the table below.

Table 1: Table of indirect (setting) impacts

Table of indirect (setting) impacts			
Designated heritage asset	Category of harm	Extent of harm	View reference
Church of St Giles in the Fields, listed Grade I and associated lych gate, Vestry Room, listed Grade II;	Less than substantial	Very low	DAS Views 8 and 11 and HTVIA Figure 9.1
Palace Theatre, listed Grade II;	No harm	No harm	DAS View 1
Elms Lester Painting Rooms, 1-5 Flitcroft Street, listed Grade II;	Less than substantial	Very low	DAS View 8 and HTVIA Figure 9.1
Denmark Street Conservation Area (LBC), adjacent to the north;	Less than substantial	Low	DAS Views 5, 6, 7, 8, 11, 12

Seven Dials (Covent Garden) Conservation Area (LBC), adjacent to the south;	Less than substantial	Very low	DAS Views 1, 2, 3, 4, 9, 10 and HTVIA Figures 9.2 and 9.3
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Heritage benefits assessment

37. The heritage benefits include:

- The reinstatement of some lost features, including the entrance canopies and the tall window and entrances on Shaftesbury Avenue.
- Repair, cleaning, and structural works to the retained fabric, together with the cleaning and repair of the Bayes frieze and roundels (see comments below).

38. The reversion of a theatre use is stated as a heritage benefit. However, whilst this is recognised as a key public benefit, which would respond positively to London Plan policies which seek to promote and enhance London’s cultural offering and visitor attractions, it is not considered to be a heritage benefit because the use is proposed in a new basement space, without reinstatement or reuse of any historic theatre elements.

39. The applicant’s case is that the building is in poor condition, that repair works would be costly, and that the hotel element (including the roof extension) is necessary to viably repair the building and to provide the basement theatre. A Façade Condition Survey has been submitted and this explains the observed condition and structural issues (including the possible Regent’s Street Disease). The application includes a detailed Schedule of Works relating to the repairs necessary to implement the scheme. The repair works should be appropriately secured as part of any permission.

Heritage conclusions

40. The proposed development is assessed to cause a high level of less than substantial harm to the Listed Building and, as such, it is contrary to London Plan Policy HC1. A range of heritage benefits have been identified whilst the applicant has also produced a schedule of wider public benefits. It is recognised that the repair works to the Listed Building are an important, and costly, heritage benefit.

41. In this circumstance, the heritage benefits and public benefits could potentially outweigh the reduced level of harm identified. GLA Officers will undertake a full assessment of the heritage balance at Stage 2.

Transport

Healthy Streets

42. The updated Transport Assessment (TA) includes a day and night-time ATZ which is welcome. The assessment has identified potential improvements to footways. The Council should consider securing a contribution towards these or S278 works in kind as appropriate.
43. The TA includes pedestrian comfort levels for all streets that surround the site, which is welcome. This shows pedestrian demand from that the development itself has marginal impact on pedestrian comfort levels and shows good scores for Shaftesbury Avenue and parts of New Compton Street. St Giles Passage and Stacey show low scores. The low score adjacent to proposed loading bay should be used to inform both the design of this area and management of deliveries and servicing.

Cycle Parking and Cycle Hire

44. The proposed cycle parking provision is 18 short stay spaces and 32 long stay compliance with Policy T5 Cycling, design will comply with London Cycle Design Standards and proposed to provide end of journey facilities (4 showers and 32 lockers. This is welcome and should be secured by condition.
45. The TA suggest on-street provision for short stay cycle parking and recommends either direct provision or financial contribution. Additionally, TfL is keen to work with the Council to deliver a new Cycle Hire facility and are open to discussing what Cycle Hire provision is necessary and appropriate financial contribution.

Accessible Car Parking

46. It's welcomed that applicant is discussing on-street blue badge parking proposals with Camden. The provision should be secured by s106 or by condition in line with London Plan Policy T6.

Deliveries and Servicing

47. The draft Delivery and Servicing Plan proposes to reduce delivery vehicles by half through consolidation. This is welcome and should be secured by condition.
48. The proposal to spread deliveries throughout the day is supported in principle. However, it worth considering the types of deliveries, those that have longer dwell times or involve moving bulky or heavy loads across the footway should avoid pedestrian peaks.
49. The proposal to allow parking in the loading after 8pm and up to 8am, could constrain use of the loading when needed and reduce the option for out of hours of deliveries. This should be reconsidered.

Construction

50. A Construction Management Plan has been prepared and should be secured by condition.

Sustainable development

Energy strategy

51. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site may a contribution to a carbon offset fund or reductions provided off-site be considered.
52. An Energy Statement has been submitted with the application, which does not yet fully comply with London Plan policies SI2, SI3 and SI4. The energy strategy should be further refined, with additional evidence supplied to confirm compliance. Further information is required on Be Lean, overheating, as well as additional measures to further reduce carbon savings. Full details have been provided to the Council and the applicant in a technical memo which should be responded to in full.

Whole Life-cycle Carbon

53. The applicant has submitted a revised whole life-cycle carbon assessment and GLA WLC template. Further information is required relating to the key actions taken to reduce embodied carbon emissions along with refrigerant details. The applicant must respond to these matters outlined within the WLC GLA template (issued under separate cover).
54. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)³.

Circular Economy

55. The applicant has submitted a Circular Economy Statement and GLA template in accordance with the GLA guidance. This does not yet comply with London Plan policies D3 and SI7 with further clarification needed regarding the Pre-Demolition Audit, standardisation of materials, as well as detailed information on the operational waste management strategy. The applicant must respond to the matters outlined within the CE Memo (issued under separate cover).

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

56. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)⁴.

Environmental issues

Urban greening

57. The proposed development presents a considered approach to integrating green infrastructure and urban greening which is supported. This includes the incorporation of green roofing and proposed trees, which supports multifunctionality, in accordance with Policy G1 of the London Plan.
58. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.315, which exceeds the target set by Policy G5 of the London Plan.

Sustainable drainage and flood risk

59. The FRA provided for the proposed development generally complies with London Plan Policy SI12. Direct engagement should also take place with relevant stakeholders concerning tidal, fluvial and reservoir flood risk.
60. The surface water drainage strategy for the proposed development generally complies with London Plan Policy SI13 subject to the condition that the SuDS maintenance plan, exceedance flow routes and drainage proforma have been submitted and approved by the relevant stakeholders.

Air quality

61. An Air Quality Assessment was provided with the application which included a construction dust risk assessment, a qualitative site suitability assessment and an air quality neutral assessment.
62. The Air Quality Neutral Assessment used appropriate guidance and it has been appropriately demonstrated that the proposal is air quality neutral. The Dust Risk Assessment was undertaken using out of date guidance and this should be updated using the IAQM (2024) guidance.

Biodiversity

63. The site is within close proximity the Phoenix Garden Site of Importance for Nature Conservation (SINC), identified as being of Local Importance. In accordance with Policy G6 the applicant should avoid impacts to the SINC and set out in the application how they will avoid direct or indirect impacts on the SINC.

⁴ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

64. The applicant has provided quantitative evidence that the proposed development secures a net biodiversity gain of 0.12 units, which is equivalent to a net gain of 716.38%, in accordance with Policy G6 of the London Plan. This is acceptable.

Local planning authority's position

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

Legal considerations

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

Financial considerations

67. There are no financial considerations at this stage.

Conclusion

68. London Plan policies on land use, urban design, heritage, transport, and sustainable development are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land use principles:** The reinstated theatre would respond positively to London Plan policies which seek to promote and enhance London's cultural offering and visitor attractions. As such, this use is strongly supported by GLA Officers. The hotel use is in line with the strategic function of the CAZ and is supported.
- **Urban design:** The height and scale of the proposed upwards extension has been reduced by 8.36 metres from the submitted scheme and the scale of the extension would now be similar in height to that of the existing

building form. The proposal would provide an improved interface to Shaftesbury Avenue.

- **Heritage:** GLA Officers have identified a high degree of less than substantial direct harm to the listed building, as well as a very low degree of less than substantial harm to the setting of adjacent conservation areas and listed buildings.
- **Transport:** The Transport Assessment generally complies with London Plan policy and a range of mitigation measures should be secured within the s106 legal agreement.
- **Sustainable development:** Further work is required to the Energy Strategy, Circular Economy Statement and Whole Life Cycle Carbon Assessment.
- **Environment:** The proposal generally complies with urban greening, flooding, drainage, and biodiversity policy. Minor matters remain outstanding on air quality.

For further information, contact GLA Planning Unit (Development Management Team):

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