

**PLANNING STATEMENT**

**16A - 18 WEST CENTRAL STREET, 10 - 12 MUSEUM STREET, 35, 37 & 39-41 NEW  
OXFORD STREET, LONDON**

For

**CITY & GENERAL NEW OXFORD STREET LLP**

JULY 2013

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## 1.0 INTRODUCTION

1.1 This statement is written on behalf of City & General New Oxford Street LLP in support of a full planning application and conservation area consent application for the site comprising 16a-18 West Central Street, 10-12 Museum Street, 35, 37 and 39-41 New Oxford Street.

1.2 The proposal involves differing degrees of alteration to each building within the site with a view to providing a comprehensive mixed-use scheme comprising retail (Use Class A1-A3), office (Use Class B1) and residential (Use Class C3) uses. The description of development is as follows:

*“Demolition of 16A/B and 18 West Central Street and erection of five storey mixed use building comprising retail (A1-A3) at ground and basement floors and offices (B1) at first and residential (C3) above. Reconfiguration of existing retail (A1) floor space at ground floor of 39-41 New Oxford Street to provide retail (A1-A3) floor space linking through to proposed ground floor retail at 16A/B and 18 West Central Street. Partial demolition of 10-12 Museum Street and internal reconfiguration of existing residential floor space on first, second and third floors to provide one residential (C3) unit per floor. Change of use of rear part of first and rear part of second floors of 35-37 New Oxford Street from residential (C3) to offices (B1). Scheme provides retail (A1-A3) 854sq m, residential (C3) 1,679sq m and offices (B1) 536 sq m.”*

1.3 The design process has been informed by consultation with officers of the London Borough of Camden (‘LBC’). The current proposal represents a highly efficient use of land which will enhance the local area and will give new life to a number of vacant and rundown buildings within the Bloomsbury Conservation Area.

1.4 The planning application is accompanied by:-

- Application drawings by Squire and Partners;
- Townscape and Conservation Assessment prepared by Richard Coleman Consultancy;
- Design and Access Statement prepared by Squire and Partners;

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- Daylight and Sunlight Assessment prepared by Drivers Jonas Deloitte;
- Acoustic Report prepared by Sandy Brown;
- Energy and Sustainability Report prepared by Grontmij.
- Mail Rail Tunnel Interface Report prepared by Davies Maguire & Whitby

## 2.0 THE SITE AND ITS SURROUNDINGS

2.1 The application site comprises a number of adjoining buildings within an existing block of buildings which is bounded by New Oxford Street to the north, Museum Street to the east and West Central Street which extends along the west and south. The application site includes the following buildings:-

- 39-41 New Oxford Street;
- 35 and 37 New Oxford Street;
- 16A -18 West Central Street; and
- 10-12 Museum Street.

2.2 The existing buildings listed above provide a mix of commercial uses. 39-41 New Oxford Street provides retail uses at basement and ground floor level with Class B1 uses above. 16a - 18 West Central Street currently accommodates a nightclub at basement and part ground floor level with Class B1 floorspace above.

<b>Land Use</b>	<b>Existing (sq m)</b>
Class A1-A5 Retail	299
Nightclub (Sui generis)	1,279
Class C3 Residential:	775
<b>TOTAL</b>	<b>2,353</b>

**Table 1: Existing Floorspace (GEA)**

2.3 The remaining buildings within the block provide a mix of commercial uses along with residential accommodation in the upper floors of 10-12 Museum Street. There are a mix of flats within 10-12 Museum Street. All flats are privately let on assured shorthold tenancies.

2.4 The site is highly accessible by public transport and has a PTAL rating of 6. The site is located approximately 375m from Holborn Underground Station and 390m from Tottenham Court Road Underground Station. The site is also well served by buses with

26 routes stopping within 600m of the site.

### **Surrounding Area**

- 2.5 The application site sits within an island site which fronts onto New Oxford Street. This stretch of New Oxford Street is characterised by a variety of medium to large scale buildings largely comprising retail or restaurant use at ground floor level with office and/or residential above.
- 2.6 Immediately to the east of the site lies the former Post Office building. Planning permission was granted in 1999 (ref: PS9704327R3) to redevelop the site to provide a mixed use scheme comprising a Museum Study Centre along with Class A1, A2 and A3 use, offices, a fitness club and hotel accommodation. To the south of the site lies a 15 storey building accommodating a Travelodge hotel with NCP car parking below. The views of the site from the north and west are currently dominated by these two large buildings.

### **Planning History**

- 2.7 The application site comprises the following buildings:-
- 35, 37 and 39-41 New Oxford Street;
  - 10-12 Museum Street; and
  - 16a – 18 West Central Street.
- 2.8 The planning history is limited with one application for the redevelopment of the site in its entirety site refused in March 2010 (reference 2009/5460/P). There were 19 reasons for refusal relating to design, scheme mix and local amenity. The refused scheme was considerably larger than that proposed by this application and involved wider redevelopment including the upper floors of 39-41 New Oxford Street.
- 2.9 A pre-application meeting was held with Development Control Policy and Conservation and Design Officers at LBC in respect of the site.

### 3.0 THE DEVELOPMENT PROPOSALS

3.1 The proposed development has evolved in response to feedback received from Officers at LBC. A full description of the proposed development is set out in the accompanying Design and Access Statement prepared by the scheme architects, Squire and Partners.

3.2 A comparison of the existing and proposed floor areas (GEA sq m) is given below:-

<b>Land Use</b>	<b>Existing (sq.m.)</b>	<b>Proposed (sq.m.)</b>	<b>Difference (sq.m.)</b>
Class B1 office	0	536	+536
Retail	299	854	+555
Nightclub (Sui generis)	1,279	0	-1,279
Class C3 Residential:	775	1,679	+904
<b>TOTAL</b>	<b>2,353</b>	<b>3,069</b>	<b>+716</b>

3.3 The scheme comprises a new building at 16A-18 West Central Street to provide mixed-use accommodation including retail, offices and residential. The conversion of 10-12 Museum Street to reconfigure existing small studio units into larger single apartments and a link to 39-41 New Oxford Street to significantly enhance the ground floor retail accommodation providing larger, more flexible retail units.

3.4 In terms of residential accommodation, the scheme provides a total of 12 new units and retains 7 units providing 19 residential units in total. The breakdown of residential unit mix and size is as follows:

<b>Residential</b>	<b>Existing (units)</b>	<b>Proposed (units)</b>	<b>Difference (units)</b>
Studio	26	7 (retained)	-19
1 bed	0	4	+4
2 bed	0	7	+7
3 bed	0	1	+1
<b>TOTAL</b>	<b>26</b>	<b>19</b>	<b>-7</b>

#### **4.0 PLANNING POLICY ASSESSMENT**

4.1 National planning policy is set out in the form of the National Planning Policy Framework ('NPPF') adopted on 27 March 2012. The NPPF focuses on a presumption in favour of sustainable development. The core planning principles include, amongst others, the requirement to "*drive and support development*".

4.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended), the proposed development must be determined in accordance with the development plan unless material considerations indicate otherwise. The relevant development plan for the site comprises the London Plan (2011), the LBC Core Strategy (2010) and the LBC Development Policies DPD (2010).

4.3 Material weight is also given to relevant LBC Supplementary Planning Documents ('SPDs'). The site falls within the Bloomsbury Conservation Area for which the Bloomsbury Conservation Area Appraisal and Management Strategy (2011) is also applicable.

4.4 The proposals are considered against relevant policy and guidance in respect of the following headings:-

- Principle of Redevelopment
- Land Uses
- Conservation and Design
- Sustainability
- Transport
- Residential Amenity

#### **Principle of Redevelopment**

4.5 The NPPF focuses on the delivery of sustainable development. In particular, the core planning principles include, amongst others, to "*drive and support development*" and "*encourage the effective use of land by reusing land that has been previously developed*".



The London Plan seeks to promote economic growth through sustainable development in the Central Activities Zone ('CAZ') and Core Strategy Policy CS1 seeks to make the best use of Camden's limited land.

4.6 The principle of redeveloping the application site accords with the underlying principles of the above documents through:-

- Redeveloping a previously developed brownfield site;
- Providing a mixed use development which minimises the need to travel;
- Optimising the development potential of the site whilst respecting and enhancing the setting of listed buildings and the conservation area; and
- Providing substantial investment which will assist in wider regeneration objectives for the surrounding area.

## **Land Uses**

### *Mixed Use*

4.7 The achievement of mixed use developments is a major theme within the London Plan along with the encouragement of high density residential development within the Inner London boroughs in particular.

4.8 Core Strategy Policy CS1 seeks the "provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the borough, including an element of housing where possible". The proposed scheme comprises residential (Use Class C3), offices (Use Class B1) and retail (Use Class A1-A3) and is fully in accordance with planning policy.

### *Office use*

4.9 Providing high quality office accommodation that fulfils the needs of modern occupiers is a priority of National, Regional and Local Planning policy. As well as helping regenerate an area by providing employment, the provision of well designed, flexible office accommodation can help to facilitate economic growth.

- 4.10 A strategic objective of the London Plan is to seek the renovation and renewal of existing stock to increase and enhance the quality of London's office market offer, in line with policies for maximising the intensity of development.
- 4.11 LBC's Core Strategy promotes the provision of new office space under Policy CS8 and protects existing employment space. There is a total of 493 sqm. of office accommodation currently on the site, situated to the rear of the block on West Central Street and to a lesser extent in the upper floors of 39-41 New Oxford Street. In terms of floorspace, the proposal will increase office area to 1.072 sq.m., an uplift of 579 sq.m.
- 4.12 The proposal will provide a number of benefits over the existing accommodation in terms of quality of space, sustainability and accessibility.
- 4.13 In conclusion the site is highly suitable for the proposed office accommodation and the proposed increase and improvement in office accommodation in this central location is fully in accordance with planning policy.

### ***Residential***

- 4.14 The proposals provide an uplift of 862 sqm of new residential floorspace and propose to replace 19 of the existing 26 studio units. Six of these existing units are currently registered as Houses of Multiple Occupation ('HMO').
- 4.15 The scheme proposes 12 units comprising 4x one beds, 7x two beds and 1x three beds. Policy DP5 identifies the highest priority for market housing is 2 beds and seeks a range of unit sizes in all developments. The proposed scheme therefore accords with DP5 and this is confirmed by LBC's pre-application feedback dated 22 April 2013.
- 4.16 The residential floorspace uplift is in excess of 50% of the total floorspace uplift proposed across the site. Such an approach is in accordance with mixed-use policy DP1 and confirmed by LBC's pre-application feedback.
- 4.17 All new units will meet Lifetime Homes standards and 10% of homes will be capable of

adaption for wheelchair accessibility. Within 10-12 Museum Street, Lifetime Homes standards have been met wherever possible within the constraints of the existing building. The accompanying Design and Access Statement demonstrates this in more detail. Residential unit sizes are compliant with minimum standards set out within the Camden Planning Guidance (CPG2).

- 4.18 The proposed uplift is 904 sqm and is therefore below the threshold for provision of affordable housing. This is confirmed within the pre-application feedback letter provided by LBC on 22 April 2013.

### ***Retail***

- 4.19 The site currently comprises a mix of Class A (retail) units at ground floor. The unit at 39-41 New Oxford Street is currently A1 with the remainder vacant or in A3 use. There is also at present a nightclub ('sui generis') at 16a-18 West Central Street. The proposals seek to remove the nightclub use and propose flexible A1-A3 uses across all proposed units. It is acknowledged within the LBC officer pre-application feedback that this mix represents an improvement to the area given the removal of the nightclub and as such the flexible A1-A3 uses would not have a detrimental impact on amenity or the local character of the area.

- 4.20 A number of the retail units are in poor condition and/or have remained vacant for some time. The proposals seek to provide significantly enhanced modern retail facilities which will improve the quality of the retail offer and encourage more active frontages to the local area.

### **Conservation and Design**

- 4.21 The site lies within the Bloomsbury Conservation Area. None of the buildings within the site are listed, however the site is adjacent to a number of listed buildings including 43 and 45 New Oxford Street (Grade II) and 16 West Central Street. The design of the scheme has therefore taken into consideration the impact on the heritage significance of the local area including the character and appearance of the Conservation Area and the setting of the adjacent listed buildings in line with the NPPF and Core Strategy Policy

CS14.

- 4.22 Local Policies CS14, DP24 and DP25 seek to promote the highest standards of design and preserve heritage assets and their settings.
- 4.23 A separate report by Richard Coleman Consultancy sets out the rationale and justification for the proposals in greater detail concluding that all elements of the buildings that make a positive contribution to the Conservation Area are to be retained. The report contains a detailed assessment of the existing buildings in terms of their architectural and historic merits and identifies areas of opportunity where less positive (and some cases negative) contributions to the local scene are made.
- 4.24 Richard Coleman's report concludes that those buildings considered to make little or no contribution to the history or character and appearance of the conservation area are justified for replacement under the requirements of the NPPF. The report justifies the balance between the value of the buildings proposed for demolition and the loss.

*“The heritage loss is considered minor compared to the high quality replacement elements and the overall benefits of the scheme. This is a fine example of a redevelopment which re-enlivens the city block and strikes an acceptable balance between demolition, restoration and the adding of high quality contemporary design. It is the author's belief that this balance is struck in a scholarly manner, in favour of the proposal and gives rise to contemporary design which is both modest and elegant in its context.”*

- 4.25 In conclusion, the works which make up the planning and conservation area consent application are to unlisted buildings within the Conservation Area. The works of demolition and rebuilding are proposed to those buildings considered by the applicants' historic buildings adviser to make only a neutral or negative contribution to the Conservation Area where better replacement buildings are proposed to lead to a significant enhancement to the Conservation Area. Buildings considered to make a positive contribution to the Conservation Area by virtue of their facades are either proposed to be retained and refurbished or rebuilt and extended in a facsimile style. All works proposed will enhance the Conservation Area in addition to representing a

sustainable solution for the site into the long term. Through the restoration of the buildings, the long term viability of this neglected part of the Conservation Area will be secured.

### **Sustainability**

4.26 An Energy and Sustainability Report has been prepared by Grontmij and is submitted in support of this application. The Report demonstrates that the scheme achieves a 21.4% carbon reduction through energy efficiency measures.

4.27 Sustainability Pre-Assessments indicate the following standards can be achieved:

<b>Element</b>	<b>Assessment</b>	<b>Minimum Rating</b>
Residential Refurbishment	Residential Refurbishment BREEAM Domestic Refurbishment 2012	“Excellent”
New Build Office	BREEAM New Construction 2011	“Excellent”
New Build Residential	Code for Sustainable Homes	Level 4

4.28 The scheme includes the provision of Green and Brown Roofs and Green Walls.

### **Transport**

4.29 The site has the highest possible PTAL level at 6b, and is therefore considered to be a highly appropriate location for increased density of both commercial and residential accommodation. As a dense mixed use development in a city centre location, with no car parking provision, the development promotes more sustainable transport choices on the part of residents, office workers and visitors to the proposed development.

4.30 Due to the high PTAL rating of the site, no parking is proposed within the scheme. This remains as per the existing situation. Cycle parking is provided within the basement.

4.31 As well as the strategic planning benefits outlined above, the development is considered to have a negligible impact upon the existing public transport infrastructure.

### **Residential Amenity**

- 4.32 The proposals have been assessed in terms of impact on future occupiers and existing neighbours in accordance with Policy DP26 as follows:

#### ***Daylight and Sunlight***

- 4.33 A daylight and sunlight assessment has been carried out by Drivers Jonas Deloitte and is submitted as part of the application. The assessment demonstrates that overall the proposed development satisfies the BRE Guidelines and LBC's requirements in respect of daylight and sunlight.

#### ***Noise***

- 4.34 A Noise Assessment is submitted in support of this application. The Assessment demonstrates that the proposed plant meets LBC plant noise criteria and this has been assessed against the worst affected receptors.
- 4.35 A vibration survey has been completed and confirms that tactile vibration levels from underground trains meet the requirements of LBC.
- 4.36 The Assessment confirms that standard mitigation measures including double glazing will enable the scheme to adhere to sound insulation requirements.

#### ***Open Space***

- 4.37 The application site is tightly constrained by the adjoining buildings and presents limited opportunities for the provision of on site open space. Notwithstanding this, amenity space has been provided via a communal courtyard, which is confirmed as positive feature within the pre-application feedback received from LBC.
- 4.38 Current residents on site make good use of a number of existing public open spaces with easy walking distance of the site including Soho Square, Bedford Square, Russell Square and Lincoln's Inn Fields. Given the overall reduction in the number of residential units on

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site, it is considered the proposals will not add to further pressure on existing open spaces.

## **5.0 CONCLUSIONS**

- 5.1 The scheme has been developed in consultation with officers from the London Borough of Camden. It is considered to offer a long term sustainable solution to the site, providing a mix of uses including an increased quantum of both residential and office accommodation in a highly accessible location. This complies with the aims and objectives of National, Regional and Local Planning Policy.
- 5.2 The proposals will enhance and give new life to the buildings on the site which are considered to make a positive contribution to the Bloomsbury Conservation Area, whilst providing new accommodation in the areas of opportunity identified by the historic buildings advisors.
- 5.3 Overall, the proposals will provide high quality accommodation ensuring active frontages and improving the street environment along all four elevations. The proposals not only accord with relevant national and local planning policy, but represent an appropriate, mixed-use development that is encouraged by policies contained within the Development Plan and will contribute to the vitality and viability and regeneration of the area.