

PLANNING STATEMENT

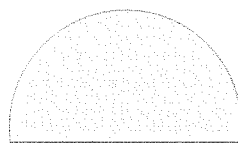
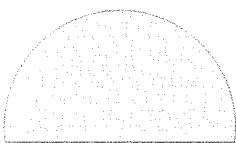
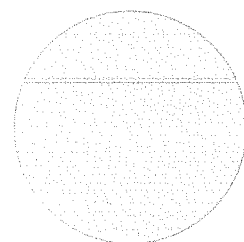
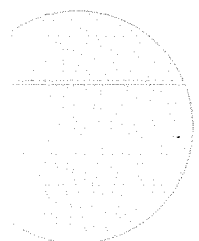
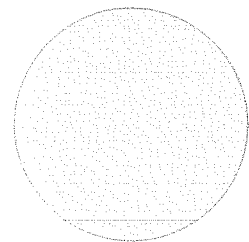
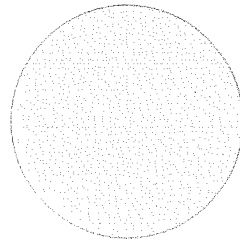
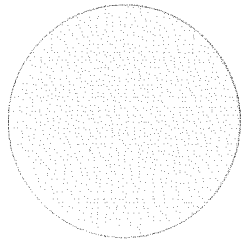
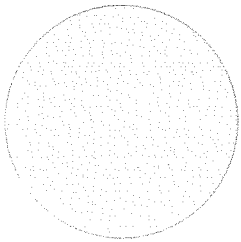
35-37 AND 39-41 NEW OXFORD STREET, 10 --12 MUSEUM STREET,

16A/B & 18 WEST CENTRAL STREET AND ANNEX TO 16 WEST CENTRAL STREET

For

CENTRAL INVESTMENT PROPERTIES (LONDON) LIMITED

NOVEMBER 2009



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1.0 INTRODUCTION

1.1 This statement is written on behalf of Central Investment Properties (London) Ltd in support of a full planning application and conservation area consent application for the site comprising 35-37, 39-41 New Oxford Street, 10-12 Museum Street, 16A/B & 18 West Central 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 containing new and refurbished residential accommodation, new office floorspace and refurbished retail and nightclub uses. The works to each building can be summarised as:-

- 16A/B and 18 West Central Street — Demolition of the single storey element of 16B, retention of 16A and 18 with additional accommodation at second and third floors and linked to a new office building on the site of 16B. The existing nightclub in the basement will be retained and refurbished;
- 35-37 and 39-41 New Oxford Street are to be refurbished and extended to the rear and at roof level to accommodate Class A1 uses at ground floor level with four floors of residential accommodation above; and
- 10-12 Museum Street will be refurbished, remodeled internally to provide residential use on three floors with better sized units above the ground floor retail office space.

1.3 The design process has been informed by consultation with officers of the London Borough of Camden and English Heritage. 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;

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- Design and Access Statement prepared by Squire and Partners (incorporating reports from Hoare Lea:- Energy Strategy Report, Code for Sustainable Homes Assessment and BREEAM assessment);
- Daylight and Sunlight Assessment prepared by Anstey Horne;
- Acoustic Report prepared by Hoare Lea;
- Transport Assessment prepared by URS;
- Travel Plan prepared by URS;
- Report on Property Market viability by King Sturge; and
- Archaeological Desktop Assessment by CgMs.

1.5 This statement provides an overview of the development and assesses the proposal in the context of the relevant Development Plan and other planning policy considerations. The statement is set out under the following topic headings:-

- i. The site and its surroundings
- ii. Planning history
- iii. The development proposal
- iv. Planning policy assessment
- v. Conclusions

1.6 The description of development stated on the planning application is as follows:-

Demolition of the single storey element of 16B West Central Street. Additional floorspace at second and third floors at 16A and 18 West Central Street to create a part 4 and part 8 storey office building and a (replacement) nightclub at basement and part ground floor level. Refurbishment and extension of 35-37 and 39-41 New Oxford Street to provide Class A1 use at ground floor and basement with 4 storeys of residential above. Refurbishment and internal remodeling of 10-12 Museum Street to provide Class A1 use at ground floor and 3 storeys of residential above.

2.0 THE SITE AND ITS SURROUNDINGS

a) Application Site

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 itself extends to approximately 0.08ha. The application site includes the following buildings:-

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

2.2 The existing buildings listed above provide a mix of commercial uses. 35-37 and 39-41 New Oxford Street provide retail uses at basement and ground floor level with residential and Class B1 uses above (respectively). 16a/b & 18 West Central Street currently accommodates a nightclub at basement and part ground floor level with Class B1 floorspace above. The annex of 16 West Central Street is currently in Class B1 use.

Land Use	Existing (sq m)
Class B1 office	733
Retail	587
Nightclub (Sui generis)	904
Class C3 Residential: Private	889
Affordable	0
TOTAL	3,113

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 and 35-37 New Oxford Street. All flats are privately let on assured shorthold tenancies.

b) London Plan and UDP Designations

2.4 The site is part of the North London Sub region identified by the London Plan (2008) and is within the Central Activities Zone (CAZ). Policy 5B.1 of the London Plan (2008) encourages development proposals to take advantage of the sub-region's exceptional access to the CAZ and to other growth and development areas to sustain relatively high levels of economic and population growth, especially in the CAZ and inner parts of the sub-region.

2.5 The application site is not identified for any specific land use in the Replacement Camden Unitary Development Plan. The site is located within the 'Central London Area' and is also identified as within an Archaeological Priority Area.

2.6 The site falls within the Bloomsbury Conservation Area.

2.7 16 West Central Street is included within the listing description of 45 New Oxford Street and is Grade II listed. The Draft Bloomsbury Conservation Area Statement (2008) includes a schedule of buildings considered to positively contribute to the conservation area and which includes 16 and 18 West Central Street, along with 33/35-37 and 39-41 New Oxford Street.

c) Public Transport Connections

2.8 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.

d) Surrounding Area

2.9 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

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and/or residential above.

- 2.10 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. This permission was part implemented and remains valid. A planning brief for this site was adopted in 2004. The Post Office building is approx 8 storeys in height with a further 4 storeys set back. 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.

3.0 PLANNING HISTORY & BACKGROUND

a) Planning History

3.1 The application site comprises the following buildings:-

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

3.2 35-37 New Oxford Street is currently occupied by a bookmakers (Class A2) at ground floor level with office use above. There is no relevant planning history for this property.

3.3 39-41 New Oxford Street comprises a vacant retail unit (Class A1) with residential units above. There is no relevant planning history for this property.

3.4 16a/b and 18 West Central Street is currently occupied by The End nightclub at two basement levels and part ground floor level with office accommodation above. There are a number of minor planning permissions relating to the use of the premises as a nightclub but which are not relevant to the current application.

3.5 10-12 Museum Street comprises vacant shops at ground floor with residential above. There is no relevant planning history for this property.

b) Background

3.6 A series of pre-application meetings have been held with Development Control Policy and Conservation and Design Officers at the London Borough of Camden in respect of the site. English Heritage has also been consulted at pre-application stage, and feedback from these discussions has informed the current proposal.

3.7 These discussions followed the submission of a previous scheme in Summer 2008 and its subsequent withdrawal in December 2008. The current scheme addresses the issues

raised in the form of a revised development proposal.

- 3.8 Heritage and land use policy considerations have influenced the design of the scheme from the outset. In recognition of the site's location within a conservation area with adjacent listed buildings, Squire and Partners have designed a scheme which is sensitive to surrounding heritage interests, whilst also seeking to bring new and improved accommodation to a currently rundown part of the Conservation Area. The proposals also aim to meet as far as possible the expectations within the Camden UDP which expects developments to incorporate a mix of uses and where appropriate, up to 50% of the additional gross floorspace to be for residential use.
- 3.9 A number of redevelopment options for the site have been looked at and discussed with officers of LB Camden principally focused on the southern part of the site deemed to be less sensitive and with greater potential to accommodate a new building. Other parts of the wider site are also incorporated as refurbishment proposals forming part of a comprehensive package aimed at revitalising the street block and bringing much needed investment to the area.

4.0 THE DEVELOPMENT PROPOSALS

4.1 As discussed in Section 4 of this report, the proposed development has evolved in response to feedback received from Officers at London Borough of Camden and English Heritage. A full description of the proposed development is set out in Section 4 and 5 of the accompanying Design and Access Statement prepared by the scheme architects, Squire and Partners.

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

Land Use	Existing (sq.m.)	Proposed (sq.m.)	Difference (sq.m.)
Class B1 office	733	3,105	+2,372
Retail	587	416	-171
Nightclub (Sui generis)	904	548	-356
Class C3 Residential: Private	889	728	-161
Affordable		470	+470
TOTAL	3,113	5,267	+2,154

5.0 PLANNING POLICY ASSESSMENT

Planning Policy Framework

5.1 The planning policy framework for the site manifests itself at three levels; national, regional and local.

5.2 National policy is set out in Government circulars and guidance notes (PPGs/PPS). In this instance, relevant national guidance includes:-

- PPS 1: Creating Sustainable Communities;
- PPS3: Housing;
- PPG13: Transport;
- PPG15: Planning and the Historic Environment; and
- PPG24: Noise.

5.3 At the regional level, The London Plan (Consolidated with Alterations since 2004) was published in February 2008. London Borough's are obliged to carry through the policies of the London Plan into their UDP's and Supplementary Planning Documents (SPD).

5.4 At the local level, the relevant Development Plan is the Replacement Camden Unitary Development Plan (UDP) adopted in June 2006. In addition, Camden Planning Guidance (adopted December 2006) gives advice on how the UDP policies are to be applied.

5.5 LB Camden is currently in the process of preparing a Local Development Framework. The core strategy is currently undergoing public consultation following which it will be considered by a Planning Inspector at an Examination in Public.

Analysis

5.6 The planning issues associated with the proposed development are considered below under the following headings:-

- Principle of Redevelopment
- Mixed Use
- Office
- Housing
- Affordable Housing
- Retail
- Nightclub
- Sustainability
- Listed Buildings & Conservation Areas
- Transport
 - a. Accessibility
 - b. Car/Cycle Parking
- Residential Amenity
 - a. Daylight/Sunlight
 - b. Noise
 - c. Open Space
 - d. Lifetime Homes
- Energy Strategy
- Archaeology

Principle of Redevelopment

5.7 The concentration of new development within existing urban areas is a key requirement in the drive for more sustainable development. This emphasis is principal to PPS 1: 'Delivering Sustainable Development' (2005), the introduction to which sees the planning system as facilitating and promoting suitable and inclusive patterns of urban and rural development. One of the key aims is stated as:-

"Ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community."

5.8 The London Plan contains a number of objectives aimed at developing London "as an

exemplary, sustainable, world city". Examples include improving London's accessibility, and making it a more attractive, well designed and green city.

5.9 London Plan (2008) Policy 2A.1 sets out a number of sustainability criteria including:-

- Optimising the use of previously developed land and recent or underused buildings;
- Using a design-led approach to optimise the potential of development sites and improve the quality of life;
- Ensuring that development occurs in locations that are currently, or will be, accessible by public transport, walking and cycling; and
- Taking account of the sustainability of sites for mixed use development and the contribution that development might make to strengthening local businesses and for the training of local people.

5.10 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.

Mixed Use

5.11 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.

5.12 The site is located within the North London sub region of the London Plan (2008) and an 'emerging indicative boundary' of an area of intensification within the Central London

sub regional Development framework (2006), where the emphasis is on urban renewal and intensive mixed use development.

5.13 At local level, Policy SD3 of the Camden UDP states:-

'The Council will seek a mix of uses in development, including a contribution to the supply of housing, and will not grant planning permission for development that reduces the amount of floorspace in secondary uses, unless it considers that particular characteristics of the proposal, site or area would make development of housing or a mix of uses inappropriate. In the Central London Area and the Town Centres of Camden Town, Swiss Cottage / Finchley Road and Kilburn High Road where a proposal would increase total gross floorspace by more than 200 sq m, the Council will expect a contribution to the supply of housing, and where appropriate will seek to negotiate up to 50% of additional gross floorspace as housing, except in the Hatton Garden area, where a smaller proportion may be accepted,

In considering the mix of uses and the appropriate contribution to the supply of housing, the Council will have regard to:-

- a. The character, diversity and vitality of the surrounding area;
- b. The suitability of the site for mixed use development;
- c. The need and potential for continuation of an existing use;
- d. Whether the floorspace increase is needed for an existing user;
- e. The need for an active street frontage and natural surveillance; and
- f. Any over-dominance of a single use in the area, and the impact of the balance of uses proposed on the area's character, diversity and vitality.

5.14 The application site is identified as being located within the Central Activities Zone (CAZ) in the London Plan and the 'Central London Area' in the Camden UDP. The principle of a mixed use scheme involving office/commercial floorspace and residential development in this location is entirely consistent with the London Plan and local policies.

5.15 The site is extremely complex given the number of individual properties and uses within

a relatively small site area. The scheme has been carefully designed to provide an appropriate proportion of commercial and residential accommodation for the area in a manner which is sensitive to the surrounding heritage interests. The provision of new, efficient office floorspace will meet the needs of future occupiers and provide additional employment on the site. The provision of 11 residential units will result in a 35% increase in residential floorspace overall and provide modern accommodation to a high standard and of a size which meets current space standards. 36% of the units will be affordable.

- 5.16 The proposal is considered to accord with UDP policy SD3: Mixed use development. This states that:-

'In the Central London Area... where a proposal would increase total gross floorspace by 200sq.m, the Council will expect a contribution to the supply of housing, and where appropriate will seek to negotiate up to 50% of additional gross floorspace as housing'. The policy goes on to state that In considering the mix of uses and the appropriate contribution to the supply of housing the Council will have regard to:-

- The character, diversity and vitality of the surrounding area;
- The suitability of the site for mixed use development
- The need and potential for continuation of an existing use;
- Whether the floorspace increase is needed for an existing user;
- The need for an active street, frontage and natural surveillance; and
- Any over-dominance of a single use in the area, and the impact of the balance of uses proposed on the area's character, diversity and vitality.

- 5.17 The total uplift of gross floorspace created by the development is 2,154 sq.m. GEA. The total area of residential floorspace in the proposed redevelopment is 1,198 sq.m. The gross uplift in residential area (taking into account the existing residential uses on the site) is 309 sq.m. equating to 35% residential increase as a percentage of uplift. The 11 residential units proposed on the site are proposed to be of a higher quality and improved unit mix than those on the site and will result in a significant planning benefit. The balance of uses reflects the site's location within a highly urban area where commercial

uses predominate. The increase in residential accommodation seeks to maximise residential uses whilst recognising the more restricted demand for residential flats in this urban location and the need also to maximise commercial uses within the Central London Area. The proposal therefore accords with the strategic aims of policy SD3.

- 5.18 The application of policy SD3 should also take into account the constraints of the site and the challenges of delivering a sustainable, mixed use development. The proposal has been developed in consultation with officers and extensive effort has been undertaken to ensure that the proposed development preserves and enhances the conservation area. The mix of uses proposed reflects current and anticipated needs within the local area and accords fully with the objectives of National and Regional Planning policy.

Office use

- 5.19 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.
- 5.20 The London Plan (2008) seeks to develop London's economy by addressing the spatial needs and implications of a developing world city. A strategic objective of the 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. The Camden Replacement UDP (2006) states that the Council will support development proposals in locations accessible by a choice of means of transport.
- 5.21 There is a total of 733 sq.m. 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 3,105 sq.m., an uplift of 2,372 sq.m.
- 5.22 The new office accommodation will be accessed from Museum Street.

5.23 The proposal will provide a number of benefits over the existing accommodation. In addition to the increase in floor area, the proposed accommodation will:-

- Benefit from a modern open plan layout;
- Be more accessible for wheelchair users;
- Incorporate facilities for cycle storage;
- Have access to the garden/courtyard at ground floor level; and
- Offer improved facilities for servicing and refuse disposal.

5.24 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.

Housing

5.25 Housing has been provided on the site in accordance with the UDP policy SD3 which seeks a mix of uses in any redevelopment proposal. The site currently has a number of small residential units in private tenure. The proposals will provide 11 modern and larger units of varying tenure with a total increase in floor area of 309 sq.m. The reduction in number of units overall is justified, not only by the corresponding increase in floorspace but also by the extensive improvement in the size and mix of units proposed. Such an approach is supported by the supporting text of the UDP (paragraph 2.33) which supports proposals that 'add to a more balanced mix of housing in the Borough by creating larger units in appropriate locations, or combine units so that all replacement units meet the Council's residential space standards where one or more previously did not'. Given the compromised nature of the existing units an opportunity exists to upgrade and enlarge the units on site in line with the UDP and the Mayors guidance on residential design standards aimed at achieving suitably sized units for London.

5.26 The residential accommodation proposed provides the fullest possible residential use as part of a mix of uses on an underused site which accords fully with policy Hi of the Camden Replacement UDP (2006).

Affordable Housing

- 5.27 The provision of affordable housing is considered a key step towards the goal of achieving sustainable development. Policy 3A.10 of the London Plan (2008) requires Boroughs to negotiate the maximum reasonable amount of affordable housing when considering individual private residential and mixed use schemes.
- 5.28 Policy H2 of the Camden UDP expects the provision of affordable housing in all sites capable of providing 15 units or more. In the supporting text (paragraph 2.23) it is also stated that this policy will be applied to developments that would provide a residential floor area of 1500 sq.m. or more. The proposed scheme provides 11 units in total, amounting to 309 sq.m. new residential floorspace and 1,198 sq.m. in total on site and therefore falls below the UDP policy threshold for affordable housing.
- 5.29 Notwithstanding the above policy, the applicant proposes four units of social rented affordable housing as a means to providing a sustainable mix of uses on site and to compensate for other aspects of land use policy where meeting policy targets in full is not possible given the complexities brought about by heritage interests within and adjacent to the site. This is an increase in affordable housing on site of four units where none currently exist.
- 5.30 Initial discussions have been held with an RSL which has indicated interest in taking the affordable units and whose input on preferred mix and tenure has been incorporated into the design of the proposals.

Retail

- 5.31 The site currently contains six Class A (retail) units. Of these, four are currently vacant, which includes 10-12 Museum Street and 37 New Oxford Street. The Museum Street retail units have been vacant for many years having failed to attract tenants and are therefore in rundown condition. The development proposals seek to consolidate the retail on site.

5.32 The New Oxford Street retail units have also experienced some letting difficulties, Number 37 having been vacant for over a year. The development proposals respond to this by consolidating the retail accommodation along New Oxford Street into two larger refurbished units. In doing so, this will provide a higher standard of accommodation suitable for the requirements of modern tenants. By updating the retail accommodation to provide for the needs of modern businesses, the proposal is in accordance with the objectives of S13 of the Replacement UDP (2006). A further retail unit will be provided on Museum Street.

Nightclub

5.33 The existing nightclub on site is to be retained albeit in smaller reconfiguration to bring it up to date with modern standards. This allows improvements to be made to sound insulation and entrance relationships in order to ensure the long term compatibility of uses on this mixed use site.

Conservation Areas and Listed Buildings

Status of Buildings

5.34 The island site within which the application buildings fall is situated entirely within the Bloomsbury Conservation Area and includes listed buildings at: 4345 New Oxford Street (for which minor works are proposed as part of a separate listed building consent application) and 16 West Central Street. The annex to the rear of 16 West Central Street (proposed for removal) is not included in the listing description. 33 New Oxford Street is also listed but is outside the ownership of the applicant and does not form part of the proposals.

5.35 In addition the draft Bloomsbury Conservation Area character appraisal (prepared by Nathaniel Lichfield and Partners for the London Borough of Camden in May 2008) identifies all of the unlisted buildings within the island site as making a positive contribution to the Conservation Area. Paragraph 6.120 of the draft document states:-

Nos. 33-45 is a group of three-five storeys which, with the exception of Nos. 39-41 (A later insertion probably dating from the 1930s). They are stucco faced and have classically influenced details (Nos.33-37 and 43 being of the same design). The whole group has a consistent band at parapet/upper storey level that unites the frontage. To the rear of this block along Museum Street and West Central Street; are some notable, smaller scale mid 19th Century buildings that contribute to the character of the area.

- 5.36 Planning Policy Guidance Note 15: "Planning and the Historic Environment" requires proposals for development involving the demolition of buildings which are either Listed or situated in Conservation Areas to be justified and an assessment made of their effect upon the historic fabric.
- 5.37 Policy B7 of the London Borough of Camden Replacement UDP states the council will only grant consent for development within a conservation area that preserves or enhances the special character or appearance of the area, and that the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area is likely to be resisted unless exceptional circumstances are shown that outweigh the case for retention. A separate report by Richard Coleman Consultancy sets out the rationale and justification for the proposals in greater detail essentially 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.
- 5.38 The proposals involve the demolition of the single storey part of 16B West Central Street.
- 5.39 The entire New Oxford Street facade will be retained and refurbished along with extensions at roof level and to the rear. The extensions have been designed sensitively to preserve and enhance the character and appearance of the Conservation Area.
- 5.40 The street elevations to Museum Street are proposed to be repaired and retained with new

office accommodation sensitively integrated behind. This maintains the only element of the buildings which are of potential interest to the Conservation Area and allows the removal of those elements that detract. Whilst the cause of some debate, there are numerous, highly successful examples of retained facades in London, and Camden in particular. This will result in a marked improvement to the condition of the buildings and correspondingly to this part of the Conservation Area as a whole.

5.41 The applicant also proposes to repair and repaint the facades of the listed buildings at 43-45 New Oxford Street as part of the improvements to the site as a whole (relevant approvals necessary for such works will be sought separately).

5.42 In conclusion, the principal 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 proposed to be refurbished and either rebuilt behind a retained facade or sensitively refurbished and, in some cases, extended. All works proposed will enhance the Conservation Area in addition to representing a sustainable solution for the site into the long term. The listed buildings at 43-45 will also be visually improved as a consequence of the development proposals. Through the restoration of the buildings, the long term viability of this neglected part of the Conservation Area will be secured.

Sustainability

5.43 The London Plan (2008) policy 4A.4 requires an assessment of the energy demand and carbon dioxide emissions from proposed major developments, which should demonstrate the expected energy and carbon dioxide emission savings from the energy efficiency and renewable energy measures incorporated into the development. The London Plan energy strategy supports a strategy of reducing carbon emissions in major developments through the following formula:-

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- Be lean — Use less energy
- Be green — Use renewable energy
- Be clean — Supply energy efficiently

5.44 Policy SD9 of the UDP states that the Council will seek developments that conserve energy and resources through:-

- Designs for energy efficiency;
- Renewable energy use;
- Optimising energy supply; and
- The use of recycled and renewable building materials.

5.45 An energy strategy for the development has been prepared by Hoare Lea following the GLA toolkit. The proposals achieve a 22% carbon reduction through energy efficiency measures using CHP technology.

5.46 Integration of renewables into the design of the building is restricted by a number of constraints including the particular location of the site above a Post Office tunnel and the nature of the location within a Conservation Area and visual sensitivities of adjacent listed buildings.

Archaeology

5.47 The site is identified as within an Archaeological Priority Area within the adopted UDP. An archaeological desk-based assessment prepared by CgMs is included as part of the application. The assessment concludes that the redevelopment proposals are unlikely to have a significant archaeological impact and recommends an archaeological monitoring exercise (watching brief) targeted where proposed development extends beyond the existing basement.

5.48 The monitoring exercise recommended above can be secured through an appropriate planning condition.

Transport

a) Accessibility

5.49 PPG13 Transport (2001) promotes the following objectives in Willis of planning policy for transport:-

- A reduction in the growth in the length and number of motorised journeys;
- The promotion of more sustainable transport choices; and
- A reduction in the need to travel by car.

5.50 The London Plan encourages development which creates a significant number of trips to be located in accessible locations together with encouragement to occupiers to adopt sustainable transport practices (Policy 3C.1).

5.51 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. In doing so, the development complies with policy T1 of the UDP which states that the Borough will only grant planning permission for developments that encourage travel by sustainable modes of travel.

5.52 As well as the strategic planning benefits outlined above, the development is considered to have a negligible impact upon the existing public transport infrastructure. The Transport Assessment accompanying the application finds current and proposed activity to be highly dispersed due to the diversity of the modes of travel and routes available (see TA for further detailed assessment).

b) Parking

5.53 As stated above, the proposed scheme is a car free development in accordance with

Camden's UDP objectives under Policy TI: Sustainable Transport which states that the council will only grant planning permission that would encourage travel by walking, cycling and public transport.

5.54 In terms of cyclists, the development will incorporate cycle parking spaces and ancillary facilities in line with UDP standards for all land uses.

c) Daylight and Sunlight

5.55 Policy SD6 of the UDP states that the Council will not grant planning permission for development that it considers causes harm to the amenity of occupiers and neighbours. The factors the Council will consider include daylight and sunlight levels.

5.56 A daylight and sunlight assessment has been carried out by Anstey Home and is submitted as part of the application. The assessment demonstrates that the proposed development satisfies the BRE Guidelines having no material impact on the daylight or sunlight to neighbouring dwellings.

d) Noise

5.57 Policy SD6 of the UDP states that the Council will not grant planning permission for development that it considers causes harm to the amenity of occupiers and neighbours. The factors the Council will consider include noise and vibration levels.

5.58 A noise assessment is submitted in support of this application. The assessment concludes that within an urban and potentially noisy location, the proposed land uses are deemed appropriate by virtue of being the same mix of uses as those currently on site and that the rebuilding / refurbishment of parts of the site allows for appropriate glazing specification to be made.

e) Open Space

5.59 The application site is tightly constrained by the adjoining buildings and presents limited

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35-37 and 39-41 New Oxford Street, 10-12 Museum Street, 16a/b & 18 West Central Street and Annex to 16 West Central Street

opportunities for the provision of on site open space. Notwithstanding this, amenity space has been provided at roof level.

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

f) Lifetime Homes

5.61 All units on site will be capable of meeting Lifetime Homes standards.

6.0 CONCLUSIONS

- 6.1 The scheme has been developed in close 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.
- 6.2 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, and therefore retained, whilst providing new accommodation in the areas of opportunity identified by historic buildings advisors, Donald Insall Associates. Put together as a comprehensive package of improvements, the scheme will rejuvenate this part of the Conservation Area thereby securing its long term future.
- 6.3 The proposals will provide high quality accommodation ensuring active frontages and improving the street environment along all four elevations. The provision of affordable housing will further enhance the mix of uses and provide for an identified need within the Borough.