



GERALDEVE

Town Planning Statement
21 – 31 New Oxford Street, London

On behalf of: New Oxford Street Limited

LJW/ANE/HBR/J6936

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1 Executive Summary

- 1.1 The application proposals brought forward by New Oxford Street Limited will provide an exciting opportunity to create a high quality sustainable mixed use development of a building within central London that has been vacant and unused for 20 years.
- 1.2 The existing sorting office building at 21-31 New Oxford Street was built by the old Ministry of Works between 1961 and 1969 in an intensely brutalist style. It ceased operations as a sorting office in the early 1990s and has since been vacant and boarded up. Its current neglected appearance detracts from the public realm, the adjacent Bloomsbury Conservation Area and from the area generally. It sits in a location between the distinct areas of Tottenham Court Road, Covent Garden, Bloomsbury and Holborn and has the potential to help stitch these areas together in the urban fabric. The existing building with its dead frontages and run down appearance does nothing in this regard.
- 1.3 Nos. 21-31 New Oxford Street occupies a large and strategically important site within the London Borough of Camden's (LBC) Central London area which has significant potential for mixed use development. This is evidenced by an Area Framework and Planning Brief adopted by the Council in 2004 and the more relevant and up to date Site Allocations Development Plan Document (DPD) adopted in September 2013 which envisages a mixed use development on the site that contributes to the provision of homes and jobs and improves the pedestrian environment in the area.
- 1.4 The application site falls within the Tottenham Court Road Opportunity Area, which the London Plan identifies and promotes as being capable of accommodating substantial development to provide new jobs or homes. The London Plan notes that these areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density, both of which apply to the application site.
- 1.5 The site provides the opportunity to deliver 21 new affordable homes and active public uses such as shops, restaurants and galleries at basement and ground floor level.
- 1.6 This site also represents an opportunity to create high quality employment space for

the 21st Century. The scheme will provide approximately 36,000 sqm of new office floorspace generating circa 3,000 new jobs which will complement the new retail and residential developments in the surrounding area.

- 1.7 As set out in the Site Allocations DPD, the Council has aspirations to improve the public realm around this site and particularly to enhance the east-west and north-south routes for pedestrians. In accordance with this objective, the development will create a distinctive place, with outstandingly well-designed public realm at its heart on Museum Street and on improved pavements surrounding the site. These improvements will be delivered as part of the development. It is also proposed to reopen Dunn's Passage and dialogue is ongoing with the adjoining site owners (who own part of Dunn's Passage) about delivering this. The wider vision for this area also includes improving the junctions to the north and south of the site and significantly enhancing New Oxford Street. The applicants are keen to maintain dialogue on these potential improvements with the relevant authorities
- 1.8 In this context it is considered that the development will make a significant contribution to both Camden and to London by resolving the dysfunctional lack of connectivity between Bloomsbury, Covent Garden and Holborn through the creation of a place of character with improved movement and connections between people and places. It is envisaged that the proposed public realm works will change the balance of space from motor vehicles to pedestrians and cyclists and in doing so improve the street environment, both for those living and working in the area, by 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 (Site Allocations DPD).
- 1.9 The proposed development will deliver the following benefits:
- i. Regenerate and transform the existing area;
 - ii. Sustainable reuse and regeneration of a building which has been vacant for the past 20 years;
 - iii. Provision of 21 much needed affordable homes (100% of Camden's affordable housing requirement);
 - iv. Provision of approximately 3,000 new jobs, equating to 60% of the Tottenham Court Road Opportunity Area target;

- v. Provision of new active public uses at ground and lower ground floor levels to reactivate street frontages with a mix of uses such as shops, galleries, cafes, and restaurants;
- vi. Activate 205m of street frontage;
- vii. High quality and attractive design, embracing the principles of sustainable design and construction;
- viii. Better building energy use through installation of modern and efficient facilities and systems;
- ix. Improvement to the surrounding public realm, in particular Museum Street, re-opening of Dunn's Passage and improvements to surrounding pavements;
- x. Contributions towards junction improvement works at Museum Street/New Oxford Street junction and Museum Street/High Holborn junction;
- xi. Creation of a safe and secure environment for existing and future residents, employees and visitors.

1.10 When New Oxford Street Limited approached the London Borough of Camden (LBC) in 2013 to advise that they had acquired 21-31 New Oxford Street, both parties recognised the opportunity to bring this unused building back into use, delivering a well-considered mixed use development comprising new employment, retail and homes to meet local needs within a landscaped setting.

1.11 The application proposals will achieve this and seek to comply with the Development Plan policies, guidance and standards contained therein. The scheme goes to the very heart of the principles contained in the NPPF, London Plan and Camden's Local Development Framework.

2 Introduction

2.1 This Planning Statement is submitted in support of a detailed planning application made on behalf of New Oxford Street Ltd ('the applicant') for the adaptive re-use, alterations and extensions to 21 – 31 New Oxford Street, London. This statement sets out the town planning case in support of the application. It summarises the planning history of the site and assesses the development in the context of relevant policies and guidance.

2.2 The 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 existing Sorting Office, including formation of new terraces, wintergardens, roof top plant and new entrances in connection with the change of use of the building to offices (Class B1), active public uses (Classes A1 and/or A3) and up to 21 affordable housing units (Class C3), along with associated highway, landscaping, and public realm improvement works”.

2.3 The statement is structured as follows:

- Section 2 – description of the site and surroundings;
- Section 3 – details of the site’s background and planning history;
- Section 4 – details of the development proposals;
- Section 5 – relevant planning policy framework;
- Section 6 – consideration of the material planning considerations arising from the application proposals; and
- Section 7 – summary and conclusions.

2.4 The proposed works are designed by AHMM Architects ('AHMM') and are described in Section 4 of this statement as well as in the 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 (in addition to this statement):

- Design and Access Statement prepared by AHMM;
- Townscape, Visual Impact and Heritage Assessment prepared by Peter Stewart

Consultancy;

- Energy Statement prepared by Arup;
- Sustainability Statement prepared by Arup;
- Acoustic Report prepared by Arup;
- Air Quality Assessment prepared by Arup;
- Daylight Sunlight Report prepared by Brooke Vincent & Partners;
- Transport Assessment, Servicing Management Plan and Travel Plan prepared by Arup;
- Construction Management Plan prepared by Arup;
- Statement of Community Involvement prepared by London Communications Agency;
- Viability Assessment prepared by Gerald Eve;
- Landscape Statement prepared by Gillespies;
- Housing Study prepared by Gerald Eve and AHMM; and
- S.106 Heads of Terms.

2.5 This statement sets out the town planning assessment of the proposed scheme and assesses it in the context of national, regional and local planning policy and guidance.

2.6 The 0.43 hectare application site is located on the south side of New Oxford Street. The existing building, which was used as a sorting office, is a ground plus seven storey building designed by the Ministry of Works and built between 1961 and 1969, and is bounded by New Oxford Street, Museum Street, High Holborn and Dunn's Passage. It has been vacant since the early 1990's.

2.7 The proposed development is for the adaptive and inventive reuse of the existing building. The proposals seek to deliver unique spaces to house and nurture creative, commerce, entrepreneurs, local businesses, retailers and affordable homes. The proposals will contribute to the regeneration of this part of London.

2.8 The planning application has been brought forward following detailed consultations with Camden Council and the Greater London Authority. Other third parties consulted throughout the design process include English Heritage, West End Community Network, Bloomsbury Association, Bloomsbury Conservation Area

Advisory Committee, InMidtown Business Improvement District and local residents and businesses. The application is a strategic application by virtue of its size and is referable to the Greater London Authority. The proposals have evolved over the consultation period and have been revised to accommodate comments made during the consultations.

- 2.9 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act (2004), and therefore the development plan, against which development within the London Borough of Camden must be assessed comprises: the London Plan, being the Spatial Development Strategy for Greater London, adopted by the Mayor in July 2011. Revised Early Minor Alterations were published in October 2013, and Camden's Local Development Framework (LDF). The LDF consists of the Core Strategy, Development Policies, Camden Planning Guidance, Site Allocations Supplementary Planning Documents (SPD) and the Proposals Map.
- 2.10 Section 3 of this statement goes on to consider the application site and its surrounding in more detail.

3 Site and Surroundings

- 3.1 The application site is located in the London Borough of Camden. The building fronts on to four streets: New Oxford Street, Museum Street, High Holborn and Dunn's Passage (a route that has been unused for many years). New Oxford Street and High Holborn are busy traffic routes through the area while Museum Street provides a strong pedestrian route south from the British Museum to Covent Garden and beyond.
- 3.2 The existing building is a standalone ground plus seven upper storey post war building which was used as a sorting office up until the early 1990's. The architecture is intensely brutalist and was constructed sometime between 1961 and 1969. The building is not listed and none of the buildings immediately adjoining the site are listed either. The nearest listed buildings are 43 and 45 New Oxford Street which are listed Grade II.
- 3.3 Nos. 21 – 31 New Oxford Street lies in the Holborn and Covent Garden Ward of Camden. The site finds itself between, but not associated with, very distinct character areas of London including Bloomsbury, Soho, Covent Garden and Holborn. The area immediately surrounding the site lacks identity and it is considered that the development will assist with creating linkages and stitching this area into its wider context.
- 3.4 The London Plan identifies the application site within the Central Activities Zone (CAZ) and Tottenham Court Road Opportunity Area. The site is not located within any protected views or viewing corridors within the London View Management Framework (2012).
- 3.5 Within the Camden Local Development Framework (LDF), the site is within an Archaeological Priority Area, Central London Location and the Tottenham Court Road Growth Area. It is not in a conservation area but adjoins the Bloomsbury Conservation Area. The site is allocated as a proposals site (Site Allocation 17) and would be suitable for the provision of new housing, commercial uses and active frontages at ground floor.
- 3.6 As noted above, the site is not located within a conservation area but the

Bloomsbury Conservation Area adjoins the site to the north, west and east. Seven Dials (Covent Garden) Conservation Area is also located one block away to the southwest. The site is therefore part of a small pocket of buildings surrounded by conservation areas.

- 3.7 Bloomsbury Conservation Area was designated in 1968. The special character of the area presents a distinctive rectangular street pattern incorporating open squares and terraced housing in the classical tradition encompassing the whole of the Georgian period. As home to the British Museum, much of the University of London and UCLH, the Bloomsbury area enjoys a reputation as a centre of cultural and historic importance.
- 3.8 The Seven Dials (Covent Garden) Conservation Area lies to the south east. With its highly distinctive radiating street pattern the Seven Dials area was laid out at the end of the 17th century.
- 3.9 The site has an excellent public transport accessibility level with the highest rating of PTAL 6b.
- 3.10 The building forms an island site with Commonwealth House as both buildings are situated between two main roads; High Holborn and New Oxford Street. A planning application to extend and refurbishment Commonwealth House has been submitted to LBC and throughout the pre-application period, the Applicant has been having an ongoing dialogue with them in order to ensure the two schemes complement each other.
- 3.11 Buildings surrounding the site are of mixed scale. They range from the 8 storey triangular shaped Commonwealth House with its interesting, though unlisted, corner clock feature, to the 16 storey Travelodge to the west.
- 3.12 Furthermore, the eight storey St Georges Court on the opposite side of New Oxford Street received planning permission in January 2013 for a glazed extension at ninth floor level with rooftop plant and roof terrace. This is under construction and nearing completion.
- 3.13 Surrounding properties are primarily in commercial (B1 office) use, although there

are upper floor residential units above properties with retail (A1) and restaurant (A3) uses at ground floor level in the area between Museum Street, New Oxford Street and West Central Street. Larger residential communities are predominantly located to the north in Bloomsbury or to the south in Covent Garden.

- 3.14 The site is located close to many of London's major tourist attractions including The British Museum and University Area to the north; Covent Garden (market, theatres and retail) to the south west; and Oxford Street retail to the west.

4 Planning History

- 4.1 The planning history for the site is extensive and therefore this Planning Statement does not include minor applications. A full planning history table is attached at Appendix A.
- 4.2 In June 1994 planning permission was granted for the “formation of a street level entrance to the mail track and installation of partial boxes on the Museum Street elevation”.
- 4.3 Planning permission (Ref. 9500266) was granted on appeal in May 1995 for the “change of use from post office sorting office (sui generis) to a museum support centre on basement, ground, first, second, third and mezzanine floors; to retail purposes (Classes A1, A2 and A3) on 2,000sqm of the ground floor fronting Museum Street, and to use for purposes within the meaning of Class B1 on the fourth, fifth and sixth floors”. This permission was renewed in 2000.
- 4.4 A number of applications were submitted and withdrawn between 1995 and 1998 for mixed use developments incorporating museum accommodation, retail, offices, leisure and hotels.
- 4.5 In April 1999 planning permission (Ref. PS9704327R3) was granted for the “change of use and works of conversion from post office sorting depot and offices to a mixed use development comprising a museum study centre with storage and ancillary uses (Class D1), uses within Classes A1, A2 and A3, offices (Class B1), fitness club (Class D2) and hotel accommodation (Class C1)”.
- 4.6 In 2001, a further planning permission was granted for the change of use to a mixed use comprising museum study centre (D1), A1, A2, A3 uses, B1 offices, B1 workshops and storage (B8).
- 4.7 In 2004 an application was withdrawn for the change of use from “sorting office use (sui generis) to office use (Class B1) on first floor and mezzanine, incorporating related works to create a new ground floor reception/entrance, relocation of existing vehicle entrance, alterations to the façade, and installation of new ventilation/air

conditioning plant”.

- 4.8 It is clear from this extensive planning history that numerous developments have been proposed over the past 20 years, none of which have been realised.
- 4.9 This application provides the opportunity to deliver the development of this site with its associated benefits to the local area and to London.

5 Development Proposals

- 5.1 A vision has evolved to create an exciting new development, building on the key policy objectives for this site and taking advantage of the building's many strengths, namely its highly accessible Central London location, 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.
- 5.2 This reflects the aspirations of the planning guidance for this site through the creation of a highly sustainable mixed-use development including office, retail and affordable housing, providing active frontages at ground floor and improving the public realm.
- 5.3 The proposed development has evolved in response to feedback received from Officers at Camden Council and extensive consultation with local groups, stakeholders and residents. A full description of the proposals is contained in the Design and Access Statement prepared by AHMM. This 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.
- 5.4 A summary and comparison of the existing and proposed land use components is set out in table 1 below:-

Table 1 – Land Use Summary

Land Use	Existing (sqm GEA)	Proposed (sqm GEA)	Net Change (sqm GEA)
Sorting Office (Sui Generis)	30,312	0	-30,312
Office (Class B1)	0	35,568	+35,568
Retail (Class A1/A3)	0	4,514	+4,514
Residential (Class C3)	0	3,530	+3,530
TOTAL	30,312	43,611	+13,299

5.5 The proposed development would see the retention and recladding of the lower floors of the building. The existing set back upper floors would be removed and reconstructed. The majority of the building would be for flexible office use (Class B1) taking advantage of double height internal spaces and inserting mezzanines around the new core. The ground and lower ground floors would be animated with 4,514 sqm of active public uses, such as shops, restaurants and galleries (Class A1/A3). The proposed development includes up to 21 new affordable homes (Class C3) in the south east corner of the site fronting High Holborn which is 100% of Camden's affordable housing requirement. The private housing requirement is to be met by a payment in lieu of providing the housing on site if a suitable alternative site cannot be found. Extensive studies have demonstrated that the private housing element cannot be practically achieved on site. A search for an appropriate off site solution is continuing to be carried out. Over 30 sites have been looked at so far. If an appropriate off site solution cannot be found and in accordance with Policy DP1, a payment in lieu, of approximately £4.2m, will be provided. The development includes public realm enhancement works including reopening Dunn's Passage, creating a new public open space on Museum Street and improving the surrounding pavements.

5.6 The breakdown of the residential unit mix and size is set out in table 2 below:

Table 2 – Residential Unit Schedule

Residential	Existing (units)	Proposed (units)	Net Change (units)
Affordable rent 1 bed (2 person)	0	7	+7
Affordable rent 2 bed (4 person)	0	2	+2
Affordable rent 3 bed (6 person)	0	4	+4
Intermediate rent 1 bed (2 person)	0	4	+4

Intermediate rent 2 bed (4person)	0	4	+4
TOTAL	0	21	+21

6 Consultation

- 6.1 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.
- 6.2 This is reiterated by the National Planning Policy Framework, March 2012, ('NPPF') which states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussions enable better coordination between public and private resources and improve outcomes for the community (paragraph 188).
- 6.3 Consultation is recognised as an essential tool for balancing the views and needs of different interest groups and securing mutually compatible solutions and as such has played an important role in the preparation of this planning application.
- 6.4 Paragraph 190 reiterates that the more issues that can be resolved at the pre-application stage, the greater the benefits.
- 6.5 The proposals for the adaptive reuse of 21-31 New Oxford Street have been subject to extensive consultation between summer 2013 and summer 2014. Those consulted include:
- London Borough of Camden Planning Officers:
 - Ed Watson
 - Frances Wheat
 - Stuart Minty
 - Neil McDonald
 - Ed Jarvis
 - The Public
 - Local Stakeholders
 - The Bloomsbury Association
 - The British Museum
 - The Bloomsbury Conservation Area Advisory Committee
 - The Seven Dials Trust
 - The Soho Society
 - The Fitzrovia Society

- The Covent Garden Community Association
- Inmidtown BID
- West End Community Network
- South Bloomsbury Tenants' and Residents' Association
- Bedford Estates
- Bloomsbury Estates
- Development Control Committee Members
 - Cllr Sue Vincent
 - Cllr Valerie Leach
 - Cllr Paul Braithwaite
 - Cllr Phil Jones
 - Cllr Roger Freeman
 - Cllr Flick Rea
- Ward Councillors:
 - Cllr Awale Olad
 - Cllr Julian Fullbrook
- Statutory Consultees:
 - Greater London Authority (GLA)
 - English Heritage
 - Transport for London

6.6 The proposals have evolved over the consultation period and have sought to accommodate, where possible, comments made during these consultations. These comments have included the height, bulk and design of the proposed building, land uses, public realm and open space, daylight and sunlight and potential Section 106 obligations. Full details are set out in the Statement of Community Involvement which accompanies this application.

6.7 The consultation events held are set out below and further details are contained within the Statement of Community Involvement.

Camden Council Officers

6.8 Extensive pre-application meetings have been held with planning and design officers from LBC since June 2013. Additional transportation, sustainability, noise and public

realm meetings have also taken place at the pre-application stage with relevant members of LBC.

Consultation with Residents, Neighbours and Other Stakeholders

- 6.9 An initial meeting with the West End Community Network (WECN) was held on 29 January 2014 to present and discuss the emerging ideas, vision and design approach.
- 6.10 A meeting with the Bloomsbury Conservation Advisory Committee (BAAC) was held on 28 February 2014. The refurbishment of the building rather than the demolition was generally supported. The desire to reopen Dunn's Passage and the proposed public realm improvement works to Museum Street were also well received.
- 6.11 A Development Management Forum was held on 4 February 2014, to present the proposals to local residents, businesses and organisations.
- 6.12 The purpose of the forum was to familiarise local people with the proposals prior to submission and enable local residents, businesses and organisations to comments on the proposals.
- 6.13 In addition, in order for local residents and businesses to understand the proposals in detail, a public consultation exhibition was held on 10 April (2pm-8pm), 11 April (10am-4pm) and 12 April (10am-4pm). Before the event, invitations were sent out in the surrounding area by letter on 31 March 2014 to advise local residents, occupiers and third parties of the applicants' intention to prepare and submit a planning application for the development of the site. The exhibition was also detailed within the Camden New Journal.
- 6.14 The public consultation exhibition aimed to demonstrate how the design team has responded to the comments raised during the discussions with officers and stakeholders.
- 6.15 The exhibition was held within the application site. The Applicant and consultant team were present to discuss the proposals and respond to any questions. In total over 60

responses were received to the proposals.

Members

- 6.16 A Members Briefing presentation was also held on 10 February 2014, which gave an opportunity to present the scheme proposals to committee members.

Third Parties

- 6.17 As part of the pre-application process, the applicant has met with the following third parties:

- i. Transport for London;
- ii. English Heritage; and
- iii. The Greater London Authority.

- 6.18 A meeting was arranged with English Heritage on 11 April 2014 to discuss the proposals. English Heritage confirmed that they were supportive of the proposals and would be content for Camden officers to lead further negotiations relating to design and materials.

- 6.19 The applicant also met with the Greater London Authority (GLA) on 3 April 2014 to discuss the proposals. The principles of the adaptive reuse and extension of the existing building to provide an office-led mixed-use redevelopment, providing affordable housing, was considered to be in accordance with strategic planning policy and therefore supported in principle. Further information was sought on design, affordable housing, sustainable development and transport. This is included within this application.

- 6.20 The applicant has also been liaising with the adjoining landowners and has been keeping them fully updated as the scheme progresses.

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 politicians 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 consultation, particularly in relation to the proposed building design, public realm and affordable housing.

7 Planning Policy Context

7.1 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:

i. The London Plan. On 11 October 2013, the Mayor published Revised Early Minor Alterations to the London Plan (REMA). From this date, the REMA are formal alterations to the London Plan and form part of the development plan for Greater London. Hereinafter this will be referred to as the London Plan (“LP”).

ii. The Camden Local Development Framework (LDF). The LDF is made up of Camden’s Core Strategy, Development Policies and Site Allocations Document. The site is specifically designated as Site 17. These replace Camden’s Unitary Development Plan in all respects. These documents set out the Council’s intentions for land use and development from 2010 to 2025. The Development Policies provide more detailed policies (from those in the Core Strategy) for assessing planning applications. The LDF documents are up to date and should be afforded full weight.

7.2 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.

National Planning Policy Guidance:

The National Planning Policy Framework (NPPF), March 2012

7.3 At a national level, Central Government published the National Planning Policy Framework (NPPF) document (27 March 2012) which supersedes previous national planning policy guidance and planning policy statements.

7.4 The NPPF document sets out the Government’s planning policies for England and how these are expected to be applied. It summarises in a single document all previous national planning policy advice. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.

- 7.5 The NPPF introduces the presumption in favour of sustainable development although it makes it clear that the Development Plan is still the starting point for decision making.
- 7.6 The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
- 7.7 One of the core planning principles of the NPPF is that planning should not simply be about scrutiny but instead be "a creative exercise in finding ways to enhance and improve the places in which people live their lives".
- 7.8 The Ministerial Statement, 'Planning for Growth', emphasises the importance of securing economic growth and employment. The document states that when considering planning applications, Local Planning Authorities should support enterprise and facilitate housing, economic and other forms of sustainable development.

Planning Practice Guidance, 2012

- 7.9 The Planning Practice Guidance was produced and published by the Department of Communities and Local Government (DCLG) in March 2014. This resource makes Planning Practice Guidance available entirely online and allows users to link between the NPPF and relevant planning practice guidance, as well as other different categories of guidance.

Regional Planning Policy: The London Plan (REMA), October 2013

- 7.10 The London Plan (LP) sets out the relevant London-wide planning policy guidance, the relevant regional planning policy guidance for Camden and forms a component part of the statutory development plan.
- 7.11 It aims to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20-25 years. The LP is the London-

wide policy context within which the boroughs set their local planning policies.

- 7.12 On 11 October 2013, the Mayor published Revised Early Minor Alterations to the London Plan (REMA). From this date, the REMA is formal alterations to the London Plan and form part of the development plan for Greater London.
- 7.13 The Mayor considers that the greatest challenge faced in London is to accommodate significant growth in ways that respect and improve London's diverse heritage while delivering the vision for an exemplary, sustainable world city. This will involve the sensitive intensification of development in locations that are, or will be, well served by public transport.
- 7.14 The proposals for the site have taken into consideration the most relevant LP policies and guidance, including those relating to land use and policies relating to height and bulk, design and sustainability.
- 7.15 On 15 January 2014, the Mayor published Draft Further Alterations to the London Plan (FALP) for a twelve week period of public consultation. The FALP has been prepared primarily to address key housing and employment issues emerging from an analysis of census data released since the publication of the London Plan in July 2011, and which indicate a substantial increase in the capital's population. An examination in public (EiP) of the Draft Further Alterations to the London Plan will commence on Monday 1 September 2014. As the FALP has yet to be examined it's the draft policies are considered to be of limited weight in determining planning applications.

Local Planning Policy: Camden Core Strategy, 2010

- 7.16 At the local level, Camden's (LBC) Core Strategy (2010) sets out strategic policies. Development control policies are set out within the Development Control Document (2010).

Supplementary Planning Guidance

- 7.17 Other relevant LBC Supplementary and Design Guidance of relevance to this

application includes:

- Tottenham Court Road Station and St Giles High Street Area Planning Framework (adopted 2004);
- 21-31 New Oxford Street Planning Brief adopted July 2004.
- St Giles to Holborn Place Plan adopted October 2012;
- Camden Planning Guidance 1 (CPG1) – Design;
- Camden Planning Guidance 2 (CPG2) – Housing;
- Camden Planning Guidance 3 (CPG3) – Sustainability;
- Camden Planning Guidance 5 (CPG5) – Town centres, retail and employment;
- Camden Planning Guidance 6 (CPG6) – Amenity;
- Camden Planning Guidance 7 (CPG7) – Transport; and
- Camden Planning Guidance 8 (CPG8) – Planning Obligations.

Site Specific Allocations

7.18 Within the LP, the site is located in the Central Activities Zone (“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 services 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 application site falls within the Tottenham Court Road Opportunity Area as designated by the London Plan, which identifies and promotes the site and surrounding area as being capable of accommodating substantial development to provide new jobs or homes. The London Plan notes that these areas generally

include major brownfield sites with capacity for new development and places with potential for significant increases in density, both of which apply to the application site.

- 7.20 On the LDF proposals map to the Core Strategy the application site is located in the Central London Area. The site is also located in the Tottenham Court Road Growth Area and is designated as an Archaeological Priority Area.
- 7.21 The site is specifically allocated within Camden's Site Allocations Document at Site 17. This policy allocates the site for mixed use development provided by the conversion, extension or partial redevelopment (of the existing building) including retail, offices and permanent self-contained (Class C3) residential accommodation.
- 7.22 The Council will use its Core Strategy, Development Policies Document, Site Allocations document and Planning Brief, where relevant and up to date, together with the Mayor of London's adopted LP as the basis for determining planning applications 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 they are in line with the adopted Core Strategy and Development Policies DPD.

Principal Planning Issues

- 7.23 As supported by the London Plan, the Local Development Framework and the numerous planning documents listed in paragraph 7.1, the site is considered to represent a major development opportunity within this area of Camden. In this context the development proposals are considered to be consistent with a wide range of policy objectives.
- 7.24 The key considerations associated with the proposals are examined in the next chapter:
- Land Use
 - Context for Development
 - Mixed Use
 - Office

- Retail
- Residential
- Affordable housing
 - Tenure and mix
 - Unit size
 - Accessibility
 - Density
- Design
 - Design rationale
 - Environmental Performance and Sustainability
 - Security
- Townscape and Heritage
 - Conservation Areas and Listed Buildings
 - Views
- Environment
 - Public realm/Open space
 - Waste
 - Ecology
 - Flooding and drainage;
 - Noise
 - Air Quality
- Amenity
 - Residential Amenity
 - Unit Aspect
 - Daylight and Sunlight
 - Overlooking
 - Amenity Space
 - Playspace
- Transport
 - Car and cycle parking
 - Servicing
 - Accessibility

8 Land Use

Context for Development

- 8.1 The application site falls within the Tottenham Court Road Opportunity Area as designated by the London Plan, which identifies and promotes the site and surrounding area as being capable of accommodating substantial development to provide new jobs or homes. The London Plan notes that these areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density, both of which apply to the application site.
- 8.2 The London Plan designation has been continued at local level at Core Strategy policy CS2 with Camden designating the Tottenham Court Road area as a Growth Area, with an expectation that 360 new homes and around 2,500 jobs will be provided up to 2031. The designation notes that transport enhancements associated with the development of Crossrail will be key to growth and seeks a balanced mix of uses, an excellent public realm, improvements to pedestrian routes, maximised densities and development of the highest quality.
- 8.3 On sites within growth areas, the Council will expect development to:
- i. Maximise site opportunities;
 - ii. Provide appropriate links to, and benefits for, surrounding areas and communities; and
 - iii. Be in accordance with the Council's aspirations and objectives for the area.
- 8.4 The supporting text of Policy CS2 sets out Camden's aspirations and objectives for the Tottenham Court Road Growth Area. At the time the Core Strategy was adopted (2010) the draft replacement London Plan (2009) expected a minimum of 600 new homes and 5,000 employment capacity in the area between 2006 and 2031. Based on development since 2006, the Council expected around 60% of homes and more than half of the jobs expected in the London Plan to be provided in private sector led schemes in the Tottenham Court Road area.
- 8.5 At a site specific level, Camden's Site Allocations Development Plan Document

(2013) provides the most relevant and up to date policy guidance on the appropriate uses for this site including retail, offices, hotel, other commercial uses and residential accommodation. The adopted Planning Brief is ten years old and therefore not all the key objectives remain relevant and up to date and some have been superseded by the adopted planning framework including the Site Allocations DPD.

Mixed Use Development

- 8.6 One of the 12 core planning principles of the NPPF is to promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas.
- 8.7 Mixed use development is also a central theme of both the LP and Camden's LDF. The LP at Policy 2.11 states that the Mayor will ensure that development proposals to increase office uses within the CAZ include a mix of uses. In addition, Policy 4.3 states that within the CAZ, increases in office floorspace should provide a mix of uses including housing.
- 8.8 The LP states that policies which favour mixed use development should be applied flexibly on a local basis so as not to compromise the CAZ's strategic functions, whilst sustaining the predominantly residential neighbourhoods in the area.
- 8.9 LBC policies CS1 and DP1 will require the provision of a mix of uses in suitable schemes. Policy DP1 states that where a proposal will increase the total gross floorspace by more than 200 square metres, the Council will expect a contribution to the supply of housing. The Council will require up to 50% of all additional floorspace to be housing.
- 8.10 Policy DP1 states that when considering whether a mix of uses should be sought; whether residential can be practically achieved on site; the most appropriate mix of unit sizes; and the scale nature of any contribution to the supply of housing and other secondary uses; the Council will take into account:-
- a) The character of the development, the site and area;
 - b) The site size, the extent of the additional floorspace and constraints on including a mix of uses;

- c) The need for an active frontage and natural surveillance;
- d) The economics and financial viability of the development including any particular costs associated with it;
- e) Whether the sole or primary use proposed is housing;
- f) Whether the secondary uses would be incompatible with the character of the primary use;
- g) Whether an extension to the gross floorspace is needed for an existing user;
- h) Whether the development is publicly funded;
- i) Any other planning objectives considered to be a priority for the site.

8.11 The policy continues to state that where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area or exceptionally a payment in lieu.

8.12 The 2013 Site Allocations DPD provides guidance for the use of the site as a mixed use development incorporating office, retail and residential floorspace.

8.13 The building is currently empty but was previously used as a Royal Mail sorting office (Sui Generis). The increase in floorspace proposed is the result of a more efficient use of the internal space through the introduction of mezzanine levels in the double height space on the lower floors as well as an extension at roof level.

8.14 The proposed uplift in gross external floor area is 13,299sqm. In accordance with Policy DP1, up to 50% (6,650sqm) of additional floorspace should be used for housing (Class C3). The proposed development is for 3,530sqm of residential floorspace to be provided on-site representing 27% of the proposed uplift.

8.15 From the outset, the project team examined the potential for the maximum quantum of housing to be provided on site in accordance with Policy DP1. Having undertaken a detailed exercise in this regard, it was considered that this amount of residential use cannot practically be delivered on-site having regard to the provisions of Policy DP1 criteria part (b), (d) and (i) set out below. The application proposal is for half of the required residential amount to be provided on site as affordable housing and for the other half (the private housing element) to be met by a Payment in Lieu (PIL) if a suitable donor site in our ongoing search is not identified. This exercise and its

conclusions are set out in detail in the Housing Study submitted with this application. The conclusions, having regard to the criteria of DP1 are summarised below.

Criterion b

- 8.16 The existing floorplates are designed for commercial use and are not readily adaptable for residential use having regard to residential design standards. The proposals are for the refurbishment of an existing commercial building which uses the entire footprint of the building.

The existing building has large commercial floor plates and high floor to ceiling heights. Therefore the majority of the floorspace is of a greater depth from the natural window light than would be required by residential use. As a result, it would be impractical to facilitate residential floorspace and provide residential accommodation in accordance with residential design standards in the majority of the building.

Even if it was possible, many of the units created would be single aspect (including north facing single aspect) and would therefore not meet the required housing standards.

There would be a significant impact on the active public uses at ground floor level due to the number of cores required through the building.

There would also be a significant impact on the office floorplates which would compromise the office space and value and in certain scenarios render the office space unlettable and therefore not deliverable.

It was clear from this analysis that the proposed housing is the maximum achievable within the building and that the only practicable solution to accommodate the quantum of housing sought by policy would be to provide residential accommodation at roof level. This would still have a significant impact on the commercial space below as additional cores would be needed to run through the retail and office accommodation.

Criterion d

- 8.17 A detailed Financial Viability Assessment (FVA) has been prepared by Gerald Eve LLP to assess the potential to include the target residential floorspace required under

Policy DP1. The FVA is submitted as part of the full planning application and considers three counterfactual scenarios together with the proposed scheme. The counterfactual scenarios relate to providing a higher proportion of residential accommodation on-site equating to the target residential floorspace required under Policy DP1.

- 8.18 The FVA robustly demonstrates that the only scenario which is potentially capable of being viable is the proposed scheme assuming growth and that this represents the maximum reasonable level of housing. This is supported by rigorous testing through sensitivity, scenario and simulation analysis to examine the inevitable uncertainties associated with development.

Criterion i

- 8.19 In terms of the other planning objectives, there is a need for new employment floorspace in Camden. The proposed scheme would create approximately 35,500 sqm of new employment space generating approximately 3,000 new jobs. The development also proposes approximately 4,500 sqm of new active public uses such as shops, restaurants and galleries, which will also create new jobs. This is in addition to approximately 3,500 sqm of on-site affordable housing.
- 8.20 Having considered that it was not practical to provide the whole of the residential floorspace requirement on site, a study was carried out to assess the potential of being able to provide it off-site. A search for an appropriate off site solution is ongoing. Over 30 sites have been looked at to date. If an appropriate off site solution cannot be found and in accordance with Policy DP1, a PIL of approximately £4.5m will be provided.

Office

- 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.
- 8.22 The Ministerial Planning for Growth Statement, March 2011, notes the importance of securing economic growth and employment. The guidance considers that Local

Planning Authorities should consider the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession and consider the range of likely economic, environmental and social benefits of proposals; including long term indirect benefits such as increased consumer choice, more viable communities and more robust local economies.

- 8.23 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 services sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media.
- 8.24 LP policy 2.13 relates to Opportunity Areas and Intensification Areas. The site is identified within the Tottenham Court Road Opportunity Area. Policy 2.13 stipulates that development proposals within Opportunity Areas should seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth and where appropriate, contain a mix of uses.
- 8.25 The supporting text of LP policy 4.2 acknowledges that in the CAZ, there remains a strong long-term office demand and a substantial development pipeline which is partly subject to the implementation of Crossrail (para 4.14). Environmental improvements in these locations continue to be needed to enhance its attraction as a global business destination. The London Plan identifies an increase in employment capacity of 5,000 for the Tottenham Court Road Opportunity Area.
- 8.26 LBC policy CS8 of the Core Strategy explains that a concentration of office growth should be promoted across growth areas and Central London. Part c) states that LBC will expect a mix of employment facilities and types.
- 8.27 LBC policy CS9 supports growth in homes, offices, hotels, shops and other uses within Central London. LBC will inter alia:
- i. recognise its unique role, character and challenges;
 - ii. support Central London as a focus for Camden's future growth in homes, offices, shops, hotels and other uses;

- iii. seek to ensure that development in Central London, in the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn and beyond, contributes to London's economic, social and cultural role while meeting the needs of local residents and respecting their quality of life;
 - iv. support residential communities within Central London by protecting amenity and supporting community facilities;
 - v. seek to secure additional housing and affordable homes, including as part of appropriate mixed use developments.
- 8.28 LBC development control policy DP13 states that where sites are suitable for continued business use, LBC will consider redevelopment proposals for mixed use schemes provided that, the level of employment floorspace is maintained or increased; and they include other priority uses, such as housing.
- 8.29 The proposals for 21-31 New Oxford Street involve the adaptive reuse and extension of the existing building to provide 35,568sqm (GEA) of flexible office floorspace. The existing building is sui generis use and was developed to be used by the Royal Mail as a sorting office and therefore has large floorplates and generous floor to ceiling heights.
- 8.30 The proposals intend to create an office building which has been designed to provide flexible internal floorspace. The open floor plate can then be subdivided as required into small or medium sized space. Additionally, mezzanines will be introduced around the central core to make the use of the proposed floor area more efficiently.
- 8.31 The proposal has the potential to provide approximately 3,000 jobs. Currently the site has been vacant for 20 years and therefore this will lead to a vast increase in job provision in the area and significantly contribute to meeting the targets set out in the LP.
- 8.32 The proposals will facilitate modern occupier demands and are therefore in accordance with the aspirations of the LP which seeks renovation/renewal of office stock to increase and enhance the quality and flexibility of London's office market.
- 8.33 The proposal therefore accords with Policies 2.13 and 4.2 of the London Plan and

Policies CS8 and CS9 of the Camden Core Strategy.

Retail

- 8.34 At a national planning policy level, paragraph 23 of the NPPF states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the Plan period.
- 8.35 The guidance makes clear that local planning authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres.
- 8.36 The NPPF requires that Local Planning Authorities should apply a sequential approach when considering the most appropriate location for retail uses i.e. focusing large scale retail in High Order Centres.
- 8.37 Paragraph 23 goes on to state that it is important that needs for retail and other town centre uses are met in full and are not compromised by limited site availability.
- 8.38 At a regional level, the LP sets out a number of policies relating to town centres and retail development. 21-31 New Oxford Street is located within the CAZ.
- 8.39 Within the CAZ, the LP seeks to support and improve the retail offer for resident, workers and visitors especially within the West End as a global shopping destination (Policy 2.10). In addition, the LP acknowledges one of the CAZ's strategic functions is to ensure that development provides for a mix of uses (Policy 2.11).
- 8.40 LP policy 2.15 sets out the requirements for development proposals within town centres. They should aim to:-
- i. Sustain and enhance the vitality and viability of the centre
 - ii. Accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations
 - iii. Support and enhance the competitiveness, quality and diversity of town centre retail, leisure and other consumer services
 - iv. Be in scale with the centre

- v. Promote access by public transport, walking and cycling
- vi. Promote safety, security and 'lifetime neighbourhoods'
- vii. Contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure
- viii. Reduce delivery, servicing and road users' conflict.

8.41 Policy 4.7 relates to retail and town centre development in relation to the LP strategic direction and planning decisions. The policy seeks to support a strong approach to assessing need and bringing forward capacity for retail development in town centres. The scale of retail should be related to the size, role and function of a town centre and its catchment.

8.42 In addition, LP Policy 4.8 seeks to support a successful and diverse retail sector.

8.43 Policy 4.9 of the LP relates to small shops. The policy seeks contributions through planning obligations from large retail developments for the provision of affordable shop units suitable for small or independent retailers.

8.44 At a local level, Policy CS1 sets out the distribution of growth within the Borough. The policy seeks sustainable development which makes the most efficient use of limited land and buildings.

8.45 Policy CS7 states that retail growth can be provided in town centres where opportunities emerge.

8.46 LBC will promote successful centres for residents, visitors and workers by:

- i. Seeking to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre;
- ii. Providing for and maintaining a range of shops, services, food, drink and other suitable uses to provide variety, vibrancy and choice;
- iii. Protecting and promoting small and independent shops, and resisting the loss of shops where it would cause harm to the character and function of a centre;
- iv. Making sure that food, drink, and entertainment uses do not have a harmful impact on residents and the local area, and focusing such uses in Camden's

Central London Frontages, Town Centres;

- v. Supporting and protecting Camden's local shops, markets and areas of specialist shopping;
- vi. Pursuing the individual planning objectives for each centre.

- 8.47 Paragraph 7.17 sets out LBC's vision for small shops. LBC will promote the provision of small units where appropriate and independent shops where possible.
- 8.48 LBC will expect the provision of small shop units as part of large retail developments provided that this is considered appropriate to the centre (para 10.4).
- 8.49 Specifically, the Council will consider the need for the provision of small units for schemes involving over 1,000sqm of retail and generally expect such provision for schemes of 5,000sqm of retail or more (para 10.4). Small units are considered to be those that are less than 100sqm gross floorspace. The Council will take in to account the character and size of the shops in the local area when assessing the appropriate scale of new premises.
- 8.50 The Site Allocations DPD promotes retail (Class A1-A3) use on the site. The Site Allocation DPD highlights the need for active frontages at ground floor level to help create a more successful and attractive place.
- 8.51 The development site lies within Central London and therefore should be promoted as part of a competitive town centre which provides customer choice and a diverse retail offer in line with the NPPF, London Plan and LDF aspirations.
- 8.52 The proposal involves the provision of 4,514sqm of active public uses such as shops, galleries, cafes and restaurants (Class A1/A3) which will enhance and transform this area of central London. The proposals support the LP and LBC objectives for the CAZ by providing enhanced retail offer in an internationally recognised shopping location.
- 8.53 At the present time the area around 21-31 New Oxford Street offers a very poor ground floor experience considering its Central London location. The aim is to create an exciting ground floor offer generating 'a sense of place' with good synergy between the upper floor commercial uses and the active uses at lower floors. The

proposals have the opportunity to activate the frontages at ground floor with a mix and scale of uses that respond to the architecture, location and the local community.

- 8.54 There is reference to potentially expanding the frontages along New Oxford Street in the Camden Planning Guidance and the St Giles to Holborn Place Study makes specific reference to the provision of more active frontages in key development sites. The New Oxford Street frontage is changing with other development in the area and is likely to improve once Crossrail opens.
- 8.55 In light of the challenging retail context, flexibility will be key to allowing a strategy to develop which remains cohesive and responsive to available opportunities and tenant demand but is also sufficiently malleable to ensure that the overall vision is realised. Operator demand is ever changing and with future developments it is essential to try and incorporate as much flexibility as possible to ensure the best possible mix of uses nearer delivery.
- 8.56 Given the strategic role of the CAZ and the importance of improving and supporting retail growth in the CAZ, we consider that it is important for the proposals to allow sufficient flexibility to enable the provision for different end users and changing market demands.
- 8.57 To this purpose, it is proposed that there will be a range of flexible A1/A3 spaces across the site with the ability to be divided into a range of different unit sizes. A number of different concepts are being considered in order to ensure it becomes a destination and a place people want to visit.
- 8.58 It is considered that the active uses should offer convenience to the local user and tourist and offer a reflection of the very central location between the two major cultural and historical centres of Bloomsbury and Covent Garden. They should be mindful of, but not attempt to compete with, the key shopping locations of Oxford Street, Tottenham Court Road and Covent Garden.
- 8.59 There is an opportunity to build on the cultural influences of the area. Perhaps a concept that incorporates multitudes of specialist retailers, large and small, including categories such as furniture, fashion, jewellery, art, food and lifestyle.

- 8.60 Along the Holborn frontage which is quite challenged with busy vehicular flows and no surrounding supporting retail, there is a potential opportunity for “white boxing” some space. This could be a home to a collective of operators, which may be street food inspired or a collective of new young designers and artists or specialist retailers. It would be an evolving and changing space sitting comfortably within the cultural environment which would provide an ever-changing reason to visit.
- 8.61 From a food perspective, it is proposed a range of unit sizes are allowed, from 100 sqm to 350 sqm in the main with the ability for a single or possible two signature spaces of c. 800/1,000 sqm.
- 8.62 From a retail perspective, it is similarly proposed a range of unit sizes are permitted of 120 sqm up to 500 – 650 sqm. It is also proposed to include the potential for a single store of 2,500 sqm or more.
- 8.63 With regards to opening hours, it is anticipated that they would be no later than 1am for the full restaurant offers. They would need to be able to trade until this hour in order to be considered favourably alongside other restaurants having similar hours in Covent Garden and Soho.
- 8.64 A strict operational and management policy would be put in place, dealing with such considerations as refuse handling, good deliveries, maintenance and cleaning of any extract duct and use of external seating areas.
- 8.65 The aim is, first and foremost, to create a place where both local residents and Londoners from further afield would want to eat and shop and encourage repeat visits on a regular basis. Appealing to the core market and creating a comfortable social arena will ensure it is appealing to local residents, visitors, be it British Museum visitors or tourists generally, and also the commuters, more particularly when Crossrail becomes established. It should provide a place of choice with a differentiated line up of operators which will be accessible and not elitist.
- 8.66 It is considered that this is an exciting opportunity that will optimise the unique volumes within the existing building and activate the frontages in accordance with planning policy and guidance.

Residential

- 8.67 The NPPF states that to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:-
- i. plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
 - ii. identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
 - iii. where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.
- 8.68 Local planning authorities should normally approve planning applications for changes to residential use and any associated development from commercial buildings where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.
- 8.69 The LP considers in Policy 3.3 that the annual average target for housing delivery is 32,210 per year across London. The annual average housing provision monitoring target 2011-2021 in respect of new homes for Camden over the ten year period is 6,650 new homes, with an annual monitoring target of 665 new homes.
- 8.70 The draft FALP seeks to increase the annual average target for housing delivery to 42,000 a year across London and sets a minimum annual average target of 8,892 for Camden for 2015 – 2025.
- 8.71 At a local level, Policy CS6 considers that there is a need to provide high quality housing through maximising the supply of additional housing to meet or exceed

Camden's ten year target of 5950 new homes from 2007-2017 and Camden's annual target of 595 new homes. The Council will seek to meet a borough wide affordable housing target of 50% and will seek to create mixed and inclusive communities across Camden.

- 8.72 As set out above, Camden's mixed use policies seek residential accommodation in development where the total gross floorspace increases by >200sqm. This is dealt with in section 8.15 above. The application proposes 3,561sqm of housing on site, all of which is affordable.

Affordable Housing

- 8.73 The NPPF, at paragraph 50, states that in order to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

- i. Plan for a mix of housing based on current and future demographic trends, market trends and needs of different groups in the community;
- ii. Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
- iii. Set policies for meeting the need of affordable housing on site.

- 8.74 LP Policy 3.10, as amended by the Revised Early Minor Alterations 2013, states that affordable housing (including social rented and intermediate housing) should be provided to specified eligible households whose needs are not met by the market and should:

- i. Meet the need of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices;
- ii. Include provisions for home to remain at an affordable price for future eligible households, or
- iii. If these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.

- 8.75 LP Policy 3.11 states that across London the target is to provide on average 13,200 more affordable homes per year over the plan period. 60% should be for social rent

and 40% for intermediate rent or sale.

- 8.76 The draft FALP proposes to increase the target to at least 17,000 more affordable homes per year over the plan period.
- 8.77 LP Policy 3.12 states that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes.
- 8.78 When deciding on the maximum reasonable amount of affordable housing, the following should be taken into account:-
- i. Current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8, 3.10 and 3.11;
 - ii. Affordable housing targets adopted in line with Policy 3.11;
 - iii. The need to encourage rather than restrain residential development;
 - iv. The need to promote mixed and balanced communities (Policy 3.9);
 - v. The size and type of affordable housing needed in particular locations; and
 - vi. The specific circumstances of individual sites.
- 8.79 Policy 3.13 of the LP states that affordable housing will be required on sites which have the opportunity to provide 10 or more homes on site applying density guidance set out in Policy 3.4 of the LP.
- 8.80 At a local level, Policy CS6 of Camden's Core Strategy states that the Council will ensure high quality affordable housing by:
- i. Seeking to ensure that 50% of the borough-wide target for additional self-contained homes is provided as affordable housing;
 - ii. Seeking to negotiate a contribution from specific proposals on the basis of:
 - Maximum reasonable amount of affordable housing that could be provided taking into account individual circumstances of the site;
 - A target of 50% affordable housing target of total addition to housing

floorspace;

- Guidelines of 60% social rented housing and 40% intermediate affordable housing;

iii. Minimising the net loss of affordable housing; and

iv. Regenerating Camden's housing estates and seeking to bring Council stock up to the Decent Homes standard by 2012.

8.81 Policy CS6 goes on to states that the Council will aim to minimise social polarisation and create mixed and inclusive communities in Camden by:

i. Seeking a diverse range of housing products in the market and affordable sectors to provide a range of homes accessible across the spectrum of household incomes;

ii. Seeking a range of self-contained homes of different sizes to meet the Council's identified dwelling-size priorities;

iii. Seeking a variety of housing types suitable for different groups, including families, people with mobility difficulties, older people, homeless people and vulnerable people; and

iv. Giving priority to development that provides affordable housing for vulnerable people.

8.82 In line with the LP and Core Strategy, Development Plan Policy DP3 states that the Council will require affordable housing to be provided on sites with a capacity of 10 or more dwellings. Where possible the Council expect affordable housing to be provided on site, but where this cannot be achieved, the Council may accept off-site affordable housing or a payment in lieu.

8.83 Policy DP3 states that the Council will seek a target of 50% of the total addition to housing floorspace, but will apply the target with regard to a sliding scale from 10% for developments with capacity for 10 dwellings to 50% for developments with capacity for 50 dwellings.

8.84 As part of the proposals at 21-31 New Oxford Street, it is proposed to provide more than 100% of the required level of affordable housing on site based on the uplift in total gross floorspace on the site.

- 8.85 The proposals will deliver 21 affordable homes on the south east corner of the building in the form of 11 x 1 bed units, 6 x 2 bed units and 4 x 3 bed units.
- 8.86 The proposed level of affordable housing is in accordance with National, Regional and Local Planning Policy as it provides more than 100% of the required level of affordable housing on site as well as the maximum reasonable amount and contributes towards the National and Regional shortage in affordable housing generally.

Unit Tenure and Mix

- 8.87 Policy 3.8 in the London Plan states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.
- 8.88 The Mayor's Housing SPG sets out the need for different unit sizes in private, affordable or mixed residential schemes. The SPG only sets out strategic London wide requirements and does not set targets for individual sites. The SPG recognises that housing should be appropriate to context and constraints within a particular site and that the requirement for units of different sizes varies widely between local areas.
- 8.89 In considering the mix of uses and the appropriate contribution to the housing supply in Camden, the strategic aim of the Council is ensure that a variety and mix of housing is provided in the Borough to suit the widely differing social and economic needs of residents.
- 8.90 At a local level, Policy DP5 states that the Council will seek to secure a range of self-contained homes of different sizes through ensuring that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table and expect a mix of large and small homes in all residential developments of 5 homes or more.
- 8.91 With regard to unit size the London Housing Design Guide provides minimum space standards for residential developments and provides guidance on a full range of residential standards. Further guidance is set out in section 4 of the Camden

Planning Guidance 2: Housing.

8.92 The proposal includes the residential unit mix set out in Table 3 below:

Table 3 – Residential Unit Mix

	1 Bed	2 Bed	3 bed	Total
Units	11	6	4	21
%	52%	29%	19%	100%

8.93 The proposed development ensures that there is a mix of units, providing 11 x 1, 6 x 2 bedroom units and 4 x 3 bed units in accordance with Camden's Core Strategy (paragraph 6.39) and Policy DP5 which seeks to encourage a range of unit sizes.

8.94 In terms of tenure, the ratio is broadly in accordance with Policy CS6 and proposes 62% as affordable rent and 38% as intermediate rent as set out in Table 4 below:

Table 4 – Tenure Mix

Residential	Existing (Units)	Proposed (Units)	Net Change (Units)
Affordable Rent 1 bed	0	7	+7
Affordable Rent 2 bed	0	2	+2
Affordable Rent 3 bed	0	4	+4
Intermediate Rent 1 bed	0	4	+4
Intermediate Rent 2 bed	0	4	+4
TOTAL	0	21	+21

- 8.95 The more detailed unit mix has been development in consultation with Camden housing officers. They have guided the applicant to a mix of smaller 1 and 2 bedroom intermediate units and towards the inclusion of 4 x 3 bedroom family units within the affordable rent component. This results in 46% (by floor area) of the affordable rent element designated for family housing.
- 8.96 In order to assess the acceptability of the units provided, Gerald Eve LLP has been appointed to advise on the proposals and speak with various local Registered Providers (RPs) who develop in Camden including Origin Housing, Octavia Housing, Soho Housing, Newlon Housing Trust and Circle Housing. All operators have expressed an interest although a final operator has not yet been selected. Discussions are also ongoing with the London Borough of Camden who has also expressed an interest in delivering the affordable housing directly.
- 8.97 There is broad RP and officer support for the unit layouts, space standards and overall configuration, recognising the favourable aspect of the residential proposal and the opportunity presented by affordable housing in this location.

Affordable Housing Unit Sizes

- 8.98 The GLA's Interim Housing Design Guide provides minimum space standards for affordable housing residential developments and provides guidance on a full range of residential standards. It should be noted that all of the affordable homes provided as part of the proposals meet or exceed the relevant housing standards.
- 8.99 The following range of typical unit sizes proposed within the development is contained in Table 5. It should be noted that the internal layouts within apartments shown on the proposed floor plans may be subject to design development.

Table 5 – Range of Typical Unit Sizes

Type of Unit	Typical Unit Sizes (sqm) GIA
1 bed 1 person	N/A
1 bed 2 person	50 (min)

	65 (min) for wheelchair accessible unit
2 bed 3 person	N/A
2 bed 4 person	70 (min) 85 (min) for wheelchair accessible unit

8.100 The affordable housing units have been designed in accordance with the GLA's Interim London Housing Design Guide (2010) and Housing SPG (2012). On the basis of the typical unit sizes above, all of the proposed units exceed these minimum unit sizes.

Lifetime Homes and Wheelchair Accessible Units

8.101 Policy DP6 contained within LBC's Development Policies considers that all housing developments should meet lifetime homes standards and 10% of new homes development either meet wheelchair housing standards or be easily adaptable.

8.102 The supporting text (para 6.6) states that the Council will expect 10% of residential units either to meet wheelchair housing standards, or be designed so a future occupier can easily adapt the dwelling. This percentage will be applied to schemes which provide 10 units or more.

8.103 The supporting text of paragraph 6.5 of Policy DP6 of the London requires the provision of 10% wheelchair accessible units. This equates to 2 units in total. As part of these proposals we will be providing 2 wheelchair accessible units.

8.104 Further details regarding accessibility are detailed within the accompanying Design and Access Statement.

Housing Density

8.105 Policy 3.4 of the London Plan states that development should optimise housing

output for different types of location within the relevant density range. Supporting paragraph 3.28 considers that it is not appropriate to apply the density matrix contained within Table 3.2 mechanistically as other factors need to be taken into account, including local context, design and transport capacity as well as open space and play space.

- 8.106 The Site is located in a prime inner London location where an efficient use of land is key. The PTAL for this site is PTAL level 6b where densities of 650-1100 habitable rooms per hectare (hr/ha) are considered appropriate.
- 8.107 The proposed development will provide 56 habitable rooms per hectare equating to 957 hr/ha based on the mixed used density calculation within the GLA Housing SPG. This sits within the specified range considered acceptable within this particular accessible location.

9 Design

- 9.1 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 (Paragraph 57).
- 9.2 It identifies that securing high quality and inclusive design goes beyond 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 (Paragraph 61).
- 9.3 Policies 5.3 and 7.2 of the LP seek development to meet the highest standards of sustainable and accessible design and construction, to improve the environmental performance of new development and to adapt to the effects of climate change over their lifetime.
- 9.4 Policy 7.3 advises that design should encourage a level of human activity that is appropriate to the location, to maximise activity throughout the day and night, creating a reduced risk of crime and sense of safety at all time.
- 9.5 Policies 7.4, 7.5 and 7.6 seek to ensure that development respects the local character of the area; promotes high quality public realm; and ensures that the architecture makes a positive contribution to a coherent public realm, streetscape and wider cityscape.
- 9.6 LP Policy 7.6 sets out a series of overarching design principles for development in London and advises that large scale buildings should be of the highest quality design, including inter alia:
- i. Optimise the potential of sites;
 - ii. Promote high quality inclusive design;
 - iii. Incorporate the best practice in resource management and climate change mitigation;
 - iv. Comprise materials and details which complement local architectural character;

and

- v. Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm.

9.7 At a local level, Core Strategy Policy CS14 seeks to ensure that new developments are attractive, safe and easy to use.

9.8 The aim of Development Policy DP24 is to require all developments to be of the highest standard of design. This policy reflects the LP design and principles and goes on to state that the Council will require all developments to be of the highest standard of design and will expect developments to consider:

- i. The character, setting, context and form and scale of neighbouring buildings;
- ii. The character and proportion of the existing building;
- iii. The quality of materials to be used;
- iv. The provision of visually interesting frontages at street level;
- v. The appropriate location for building services equipment;
- vi. The provision of appropriate hard and soft landscaping; and
- vii. The provision of appropriate amenity space.

9.9 Camden has also published a Planning Guidance SPD, April 2011 which establishes design principles to be 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. The key messages are to consider:

- i. The context of a development and its surrounding area;
- ii. The design of the building itself;
- iii. The use of the building;
- iv. The materials used; and
- v. Public spaces.

9.10 The Tottenham Court Road Station and St Giles High Street Area Planning Framework states that new development and public spaces will be designed to the highest standards, befitting their location in an historic area at the heart of the capital

city.

- 9.11 The framework goes on to set out general principles of design that should apply across the area:
- i. Developments should relate effectively to the existing pattern and sizes of streets and blocks;
 - ii. Should be designed to provide for easy movement;
 - iii. Must take account of adjoining buildings, general pattern of heights in the area and the main views / vistas / landmarks;
 - iv. A high standard of building and landscape materials;
 - v. Careful attention to architectural detailing;
 - vi. Incorporation of principles for environmental sustainability.
- 9.12 The project architects, AHMM, have designed a scheme which has a distinct identity but which will be coherent and legible and will significantly improve this part of London.
- 9.13 A detailed Design and Access Statement has been submitted to accompany the planning application. This sets out in detail the key design issues which have been considered as part of the proposals. This is summarised below.
- 9.14 The starting point for the architectural design was to celebrate the scale and volume of the existing building, particularly the deep floor plates and existing industrial scale structure of a hybrid steel and concrete frame.
- 9.15 The proposed building consists of a mix of floor to ceiling heights which adapt to the constraints of the existing structural frame and respond to varying depths of floor plate as the building rises. The architectural system adjusts to reflect the change in scale and space as you rise through the building.
- 9.16 The distinctive double height spaces, at lower ground, ground, 1st, 2nd and 8th floor, will be served by a lower pane and an upper pane which will provide light whilst relieving the need to provide a 3m grid on elevation which dominates the majority of contemporary office buildings, allowing the large scale glazing to be unbroken. The 3rd-7th floors will consist of a more conventional scale of glazing pane.

- 9.17 A module of solid panels is proposed on the north elevation, set out in relation to the 4.5m dimension of the glazed panes. This is the most formal and controlled of the three elevations and is designed to respond to the more historic character of Bloomsbury to the north. This system is adapted on the west and south elevations to provide the appropriate percentage of solid, resulting in a varied composition of facades as you move around the building.
- 9.18 The architecture of the residential elevation to the south on High Holborn is adapted from the adjacent proposed office use to ensure a single holistic building proposal.
- 9.19 To ensure a dialogue with the surrounding buildings, the large scale lower floors are broken down by projecting the lower panes of glass to give the appearance of a series of smaller storey heights, representing the floor to ceiling heights of conventional office and residential buildings within the surrounding area.
- 9.20 The existing building contains a number of artefacts from its previous operation as a Royal Mail Sorting Office. These were considered to be part of the unique character of the existing building that is used as a starting point for the details and connections of the proposed architecture.
- 9.21 A series of trays are proposed to house the glazed panes and solid panels. Within these frames, glazed panes are either projected or recessed and solid panels are set. The frames themselves are proposed as pre-fabricated components that repeat across the building.
- 9.22 The proposals have been developed to give a clear identity to the proposed building, which builds on the inherited industrial qualities. The proposed infill panel is made of a high quality, self-finished, textured metal. The specific material qualities of the metal panel will be subject to approval by condition.

Environmental Performance / Sustainability

- 9.23 One of the core 12 principles of the NPPF is to support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encouraging the reuse of existing resources, including conversion of existing buildings, and encouraging the use of renewable resources (for example, by the

development of renewable energy).

- 9.24 The Mayor's vision in the LP is to ensure London becomes an exemplary, sustainable world city whilst allowing London to grow in a responsible and considered socio-economic manner.
- 9.25 LP Policy 5.1 seeks to achieve an overall reduction in London carbon dioxide emissions of 60% (below 1990 levels) by 2025.
- 9.26 Policy 5.2 states that proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's energy hierarchy.
- 9.27 Major development proposals should include a detailed energy assessment to demonstrate how the minimum target for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy.
- 9.28 Policy 5.3 states that development proposals should ensure that sustainable design standards are integral to the proposal, including its construction and operation, and ensure they are considered at the beginning of the design process.
- 9.29 Policy 5.6 considers that development proposals should evaluate the feasibility of a Combined Heat and Power system which should seek:
- i. Connection of existing heating or cooling networks;
 - ii. Site wide CHP network;
 - iii. Communal heating and cooling.
- 9.30 Policy 5.7 seeks to increase the proportion of energy generated from renewable sources, and that the minimum targets for installed renewable energy capacity will be achieved in London. Development proposals should provide a reduction in carbon dioxide emissions through the use of onsite renewable energy generation, where feasible.
- 9.31 All renewable energy systems should be located and designed to minimise any potential adverse impact on biodiversity, the natural environment and historical assets.

- 9.32 Policy 5.10 states that the Mayor will promote and support urban greening such as new planting in the public realm which includes tree planting, green roofs and walls and soft landscaping.
- 9.33 Policy 5.11 encourages the use of roof, wall and site planting, especially green roofs and walls where feasible, to deliver as many objectives of draft Policy 5.11 as possible.
- 9.34 Camden Core Strategy Policy CS13 advises that the council will require all developments to take measures to minimise the effects of and adapt to climate change.
- 9.35 Development Policies Policy DP22 requires development to incorporate sustainable design and construction measures including providing green and brown roofs; meeting Code for Sustainable Homes level 4 by 2013; expecting developments to meet very good in Eco Homes prior to 2013 and encouraging 'excellence' from 2013; expecting non-domestic development to achieve 'very good' BREEAM assessments and 'excellent' from 2016; and ensuring schemes include appropriate climate change adaptation measures, such as:
- i. summer shading and planting;
 - ii. limiting run-off;
 - iii. reducing water consumption;
 - iv. reducing air pollution; and
 - v. not locating vulnerable uses in basements in flood-prone areas.
- 9.36 The Tottenham Court Road Station and St Giles High Street Area Planning Framework advises that the design of new development in the area should incorporate principles of environmental sustainability, particularly in respect of ventilations, energy and water use, materials, and flexibility of layout.

Be Lean

9.37 The development incorporates a number of passive measures to improve the overall energy efficiency of the building. These include:

- i. A high performance thermal envelope with triple glazing to the residential units;
- ii. Careful detailing to reduce thermal bridges and improve air tightness;
- iii. Varying the proportion of glazing on each façade and using solar control glazing to minimise the amount of unwanted solar gain in summer whilst maximising natural daylight;
- iv. Winter gardens for the residential apartments to limit solar gains from high angle summer sun;
- v. The use of exposed, heavyweight materials to provide thermal mass which regulates internal temperatures.

9.38 The building also utilises energy efficient systems. In the office areas, these will include:

- i. Low energy artificial lighting installation generally based upon LED luminaries;
- ii. Automated lighting controls with daylight linked and dimmable lighting control for perimeter zone together with presence detection control. Luminaries within the non-perimeter zones will be provided with presence detection;
- iii. Variable speed drivers on pumps and fans where appropriate;
- iv. Reduced specific fan power at central ventilation plant (1.6 W l/s);
- v. High efficiency natural gas fired boilers (96%);
- vi. High efficiency water cooled chillers with cooling towers (SEER = 5.5);
- vii. High efficiency heat recovery device to all ventilation plant (75%).

9.39 The building services systems within the retail areas will be fitted out by the future tenant. However, the retail tenants are expected to be provided with a green lease which will set requirements for issues such as:

- i. High efficiency heating and cooling plant;
- ii. Efficient ventilation systems;
- iii. Efficient refrigeration strategies;
- iv. Efficient lighting installations.

9.40 In the residential apartments a Mechanical Ventilation and Heat Recovery (MHVR) system is proposed. In addition to the use of the MHVR system, the following additional measures are proposed:

- i. High efficiency natural gas fired boilers (92%);
- ii. Highly efficient waste heat recovery in MVHR ventilation plant (91%);
- iii. Low specific fan power from ventilation plant (0.4 W l/s);
- iv. At least 75% of lighting fittings will be of the dedicated low energy type;
- v. Well insulated domestic hot water storage cylinders.

Be Clean

9.41 Although at present there is no possibility to connect to a district heat network, a planned district heat network was identified around the British Museum which is located 500m from the site and space has been allocated within the basement plant room to accommodate a future incoming heating main and associated plant.

9.42 The feasibility of CHP and CCHP has also been considered but was found to be unfeasible due to the size and profile of the building's loads. Therefore the office and residential elements of the building will be served by high efficiency, centralised gas boiler for heating. The office development will use high efficiency water cooled chillers with cooling towers to generate cooling. The retail tenants will provide their own heating and cooling plant allowing each to match their heating and cooling requirements to their operating hours and energy demand profiles.

Be Green

9.43 Both solar hot water heating and photovoltaic (PV) panels were found to be technically feasible for the development. The PV panels can potentially offer a greater emissions reduction potential, per sqm of roof area, and are therefore proposed as part of the development.

9.44 The development has identified an area of approximately 340sqm that is suitable for PV panels. 300sqm of these will be dedicated to the commercial element offering a commercial element carbon emissions reduction of around 2.6%. The remaining 40sqm will be dedicated to the residential element, offering a residential element

carbon emissions reduction of around 10.8%.

Security and Community Safety

- 9.45 The London Plan recognises that initiatives relating to policing and community safety and crime reduction are important in improving the quality of life of many Londoners. These include sensitive design and lighting, joint action to tackle crime on estates and measures taken through regeneration initiatives.
- 9.46 Policy 7.3 lists a number of design principles for new development including that they are safe for occupants and passers-by taking into account the objectives of ‘Secured by Design’, ‘Designing out Crime’.
- 9.47 The Secured by Design initiative states that good design must be the aim of all those involved in the development process and should be encouraged everywhere. The objective of Secured by Design is to achieve a better quality of life by addressing crime prevention at the earliest opportunity in the design, layout and construction of homes and commercial premises.
- 9.48 The Government published Safer Places: The Planning System & Crime Prevention 2004. This document firmly establishes this subject within the planning process and identifies Secured by Design as a successful model.
- 9.49 At a local level, Core Strategy policy CS17 advises that the council will require all developments to incorporate design principles which contribute to community safety and security.
- 9.50 The problem of drugs, crime and homelessness in this area are well known. A key success of these proposals will be the ability to significantly reduce these unwanted activities and create a safer, more pleasant area to live, work and visit.
- 9.51 This has been a fundamental consideration in the design of the proposals and the public realm. The introduction of active ground floor frontages is critical to creating an environment which is resistant to crime.
- 9.52 The Applicant has been working with LBC and the Metropolitan Police to develop the

Secure by Design principles. Dunn's Passage will be closed at night in order to ensure that this is not used for crime related activities.

- 9.53 A lighting strategy will be further developed across the site to create a safe environment. Additional security measures to prevent crime in the area will be installed, particularly to the recessed office entrance on Museum Street.
- 9.54 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.
- 9.55 A management company will be responsible for the day to day management of the site and will manage the CCTV cameras across the site. It is also envisaged that the management company will patrol the site 24 hours a day.

10 Townscape and Heritage

Conservation Areas and Listed Buildings

- 10.1 Under paragraph 128 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting.
- 10.2 Paragraph 131 states that in determining planning applications, local planning authorities should take account of;
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 10.3 When considering the proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a Grade II listed building, park or garden should be exceptional (paragraph 132).
- 10.4 Where a development proposal will lead to a 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 securing its optimum viable use (paragraph 134).
- 10.5 Policy CS14 contained within LBC's Core Strategy, sets out the requirements to safeguard Camden's heritage. The overall strategy is to sustainably manage growth in Camden in a way that conserves and enhances the heritage and valued places that give the borough its unique character.
- 10.6 Development policy DP25 indicates that to maintain the character of Camden's

conservation areas, the Council will:

- a) Take account of conservation area statements, appraisal and management plans when assessing applications within conservation areas;
- b) Only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- c) Prevent the total or substantial demolition of an unlisted building that makes positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention.

10.7 The adaptive reuse of the building has been carefully designed to reflect the guidance contained within the relevant conservation area statements, by creating a building which will enhance a post-war development of little architectural quality which currently responds poorly to its urban context. The proposed development is of a high quality of design, and is based on a clear understanding of the townscape and urban design character of its context as well as the significance of nearby heritage assets including the Bloomsbury Conservation Area. The proposed development will positively address the New Oxford Street and High Holborn junctions and all three street frontages and respond sensitively to the scale and height of development in the surrounding streets. It will provide a distinct sense of place to each of the three streets it faces.

10.8 The proposed development offers architecture of a high quality and deploys a crisp modern architectural language with a limited palette of high quality materials. The use of regular patterns of bays and highly articulated framing and panel elements will provide a rhythm and grain that responds to the varied context.

10.9 The proposed development will significantly enhance the quality of the townscape of the area. It is of a high quality of design and offers a number of urban design and townscape benefits including the intensification of accommodation on the site, the introduction of a mix of uses, better defined active street edges and public realm improvements. In respect of design and built heritage considerations, it is in line with the policies and guidance on design set out at National, Regional and Local level.

Views

- 10.10 The London View Management Framework (LVMF) 2012 provides guidance on the policies in the London Plan for the protection of strategically important views in London, and explains how 26 views designated by the Mayor and listed in the London Plan are to be managed. The site does not fall within any views with the LVMF.
- 10.11 A full analysis of these views and other local and mid distance views has been undertaken as part of the pre-application process and the key views have been tested and reported within the accompanying Townscape and Visual Impact Assessment.
- 10.12 The 17 views assessed as part of the Townscape and Visual Impact Assessment demonstrate that, where visible, the proposed development will enhance the views with an appropriately scaled urban development that positively addresses the street edges and the corners at the main junctions.
- 10.13 The proposed building will provide an enhanced built frontage to the principal street frontages of the site, with well-ordered elevations. The introduction of bays to the street facades with a vertical emphasis will enhance the townscape quality of these views.
- 10.14 The proposed development will appear above neighbouring buildings in some near views but the enhanced appearance of the building will enhance these views.
- 10.15 It is considered that the scale of the development proposed and the central London built context are such that there will be a limited effect on longer distance view. In more distant views from the east, the proposed building will not be very noticeable.
- 10.16 It is therefore considered that the design of the proposal is consistent with the relevant national, regional and local policy requirements.

11 Environment

Public Realm, Open Space and Routes

- 11.1 Policy 7.5 of the London Plan seeks to ensure amongst other objectives, that London's public spaces should be secure, accessible, easy to understand and maintain and incorporate the highest quality landscaping, planting, furniture and surfaces.
- 11.2 At a local level, policy DP24 seeks to ensure that developments provide high quality landscaping proposals. Supporting paragraph 24.22 advises that new hard and soft landscaping should be of a high quality and should positively respond to its local character.
- 11.3 The Site Allocations DPD sets out the Council's aspirations to improve the public realm around the site. It is acknowledged that there is a need to reconfigure the existing arrangement of roads and pavements to provide a safer and more pleasant pedestrian environment and better east west and north south routes.
- 11.4 The Site Allocations DPD for the site states that a key objective of the framework is that the 'area becomes a distinctive place, with outstandingly well-designed public realm at its heart, a place to enjoy being in as well as passing through and to connect better to the places that surround it.'
- 11.5 As a result of Crossrail and the station upgrade works at Tottenham Court Road there is an anticipated rise in pedestrian numbers from 30 million in 2009 to 56 million in 2018. In this context the requirement for improved public realm and pedestrian permeability becomes vital for the success of the surrounding area moving forward.
- 11.6 Camden Council has recently consulted on the West End Project having secured £26 million of investment to improve the West End in Camden. Centred around removing the one way system on Gower Street and Tottenham Court Road, the scheme includes the following benefits:
- Five public spaces will either be created or improved along with a brand new park. A total of 18,000 square metres of new public realm will be

created along with nearly 300 new trees planted in the area;

- The one-way system will be replaced with two-way, tree-lined streets, some protected cycle tracks and improved public spaces;
- The scheme will also improve safety, reduce congestion and pollution, widen pavements and improve access to public transport.

11.7 It is Camden's intention for the project to be delivered by 2018 in time for the opening of Crossrail, when it is estimated that Tottenham Court Road Station will be busier than Heathrow Airport.

11.8 Although the site falls just outside of the area covered by the West End Project, the proposed development has taken into consideration any future changes to main roads and junctions as well as pedestrian movement and public realm.

11.9 The design rationale for the development has evolved in this context, seeking to address and encourage the predicted increase in pedestrian flows through the careful development of a new public open space on Museum Street.

11.10 At present the area of Museum Street to the south of New Oxford Street and adjacent to the site is an underused and intimidating space due to a lack of active frontage and poor quality materials.

11.11 The proposed public realm design will integrate this development into its context and provide an improved public realm for the key streets bordering the site. The emphasis is on the improvement of the pedestrian experience through re-paving with high quality materials, de-cluttering pavement zones, careful placement of street furniture and de-prioritising of road space to give a pedestrian priority.

11.12 The key features of the design in terms of public realm are as follows:

- Creation of a new vibrant space on Museum Street, reducing the impact of the road and creating a pedestrian friendly environment;
- Creation of a visual link between the new lobby space and public realm on Museum Street;
- Enhancing north-south pedestrian and cycle connection, by creating inviting

public realm in Museum Street which provides a space to dwell on the way between the British Museum and Covent Garden;

- Re-opening of Dunn's Passage to provide a historical pedestrian link;
- Simplification and de-cluttering of pavements to High Holborn and New Oxford Street; and
- Improvements to the junctions at the north and south end of Museum Street are proposed to simplify pedestrian crossing movements and improve the pedestrian environment.

11.13 The proposed public realm design will unify the paving treatment from the development across to the existing Travelodge building in one paving treatment encompassing paving in the roadway to create a pedestrian emphasis to the space. This unification of the ground plane will expand the appearance of the space and decrease vehicular speeds.

11.14 It is proposed to reduce the roadway width but still allow two cars to pass as well as cycles in both directions. 50mm kerbs are used to delineate the roadway and create a clear vehicle-free safe zone for pedestrian.

11.15 The existing group of mature London Plane trees will be retained with planting introduced beneath providing seasonal interest and colour.

11.16 The central section of Museum Street has a strong visual connection to the lobby of the proposed building and creates a civic front to the building. This part of the new open space is designed around a grid of trees with informal seating elements. There is an opportunity in this space for an artistic commission running through the paving which forms a visual expression of the mail rail which runs below this street and the former sorting office building.

11.17 The northern part of the street reflects the narrower building section and balanced relationship of the pavements widths. This has continuity in material with New Oxford Street which is larger paving slabs in the pavement with smaller setts in the roadway.

11.18 There is an opportunity for the proposed treatment of Museum Street to be continued north of New Oxford Street to emphasise the strong connection across New Oxford

Street to the British Museum.

- 11.19 There is an aspiration to re-open Dunn's Passage and restore the pedestrian link between High Holborn and New Oxford Street. It is hoped that this can be delivered as part of the proposals. However, this is not entirely in the Applicant's control as a section of it is owned by Henderson Global Investors who own Commonwealth House. A legal agreement will be required in order to secure this opening. The Applicant is in advanced and detailed neighbourly discussion with Henderson Global Investors in order to deliver this.
- 11.20 The character of this narrow route is defined in a large part by the proposed building and RAMPED service access to the adjacent site which forms the eastern boundary of Dunn's Passage. The treatment of the space is proposed to be simple and clear. Small unit paving will complement the scale of the space and a green wall is proposed for its middle section which takes advantage of the greater light levels provided by the set back of the building. Uplighters could be integrated into the paving which wash light up the building façade and green wall and extend the safe use of the space into the evening.
- 11.21 For safety reasons, public access to Dunn's passage will be restricted at night-time. Gates will close off the space during the night.
- 11.22 A retail unit is proposed to the north to provide activity. To the south the affordable housing entrance turns along the passage to give a distinct character to the new route.
- 11.23 By locating access to the service yard for 21-31 New Oxford Street on High Holborn, clear separation is maintained between pedestrian use of Dunn's Passage, service access and cycle access.
- 11.24 Further details of public realm, open space and routes are detailed within the Landscape Statement submitted alongside this application.

Waste

- 11.25 The Mayor's Municipal Management Strategy, Waste Strategy 2000 requires a

reduction in biodegradable waste going to landfill and therefore demands better sustainable waste management practices to be adopted by all.

- 11.26 At a local level, Core Strategy policies CS13 and CS18 aim to reduce the amount of waste produced in the borough and increase recycling and the re-use of materials to meet the targets of 40% of household waste recycled by 2010, 45% by 2015 and 50% by 2020 and make sure that developments include facilities for the storage and collection of waste and recycling.
- 11.27 Development Policies policy DP26 advises that The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity.
- 11.28 The proposal includes recycling facilities for both residential and commercial waste. In respect of the commercial waste facilities, a coordinated facilities management team will be employed to book deliveries, store material, arrange goods transfer and manage waste.
- 11.29 The proposals are therefore considered to accord with national, regional and local planning policy.

Ecology and Biodiversity

- 11.30 The UK Biodiversity Plan was published in 1994; the Mayor published his Biodiversity Strategy in 2002, the London Biodiversity Partnership published the London Biodiversity Action Plan 2001-2004.
- 11.31 At a local level, Core Strategy policy CS13 and Development Policies DP22 requires developments to incorporate green or brown roofs and green walls wherever suitable.
- 11.32 The Landscape Strategy offers the following measures which will add significant ecological enhancement to the site:
- i. New trees;
 - ii. Planters incorporating a range of plant species;
 - iii. Planting at residential and commercial terraces; and

iv. Green roof area.

11.33 It is therefore considered that the proposed ecological measures will enhance the site in line with policies CS13 and DP22.

Flooding

11.34 At a regional level, Policy 5.11 contained within the LP states that the proper consideration of flood risk is vital to ensuring that London is and continues to be a sustainable city.

11.35 At a local level, Core Strategy Policy CS13 states that LBC will minimise the potential for surface water flooding.

11.36 Development Policy DP22 requires developments to incorporate green or brown roofs and green walls wherever suitable.

11.37 Policy DP23 states that LBC will require developments to reduce their water consumption, the pressure on the combined sewer network and the risk of flooding.

11.38 The development site is not within the areas at risk from surface water flooding outlined in Camden's Development Policies Map 2 and is therefore considered to be at a low risk of flooding.

11.39 Almost the entire site is covered by structure and hard standing, with limited areas of vegetation. The large area of hard standing means that there are likely to be few opportunities for the rainfall to naturally infiltrate into the underlying soils.

11.40 The proposed development includes the following sustainable measures:

- i. Rainwater attenuation through the green roof;
- ii. Rainwater attenuation through a "blue roof";
- iii. Discharge of rainwater to a surface water sewer/drain; and
- iv. Discharge of rainwater to the combined sewer.

11.41 It is therefore considered that the proposed measures meet the regional and local

policies relating to water and flooding.

Noise

- 11.42 Policy 7.15 of the London Plan states that development proposals should seek to reduce noise by:
- a. Minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals;
 - b. Separate new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation;
 - c. Promoting new technologies and improved practices to reduce noise at source.
- 11.43 Policy DP28 of Camden's Development Policies states that the Council will seek to ensure that noise and vibration is controlled and managed and will not grant planning permission for:
- a. Development likely to generate noise pollution; or
 - b. Development sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided.
- 11.44 DP28 states that Development that exceeds Camden's Noise and Vibration Thresholds will not be permitted. The Council will only grant permission for plant or machinery if it can be operated without cause harm to amenity and does not exceed our noise thresholds.
- 11.45 DP28 also states that the Council will seek to minimise the impact on local amenity from the demolition and construction phases of development. Where these phases are likely to cause harm, conditions and planning obligations may be used to minimise the impact.
- 11.46 The Acoustic Report submitted as part of this application involved environmental noise and vibration surveys at the proposed development site. As assessment of the results of the surveys was undertaken in respect of London Borough of Camden's planning requirements. The assessment indicates that it could be considered

appropriate to grant planning permission in the presence of the prevailing noise and vibration climate in light of relevant UK planning policy and British Standards.

- 11.47 The proposals therefore fully accord with National, Regional and Local planning policy.

Air Quality

- 11.48 Under Policy 7.14 of London Plan, “Improving air quality”, boroughs should implement the Mayor’s Air Quality Strategy and work towards achieving reductions in pollutant emissions.

- 11.49 At a local level, Core Strategy policy CS11 promotes sustainable and efficient travel and policy CS16 seeks to improve Camden’s health and wellbeing.

- 11.50 Under Development Policy DP32 the Council, in assessing proposals, will require air quality assessments where development could potentially cause harm to the air quality.

- 11.51 The entire borough of Camden has been designated as an air quality management area for nitrogen dioxide and PM10 through the local air quality management regime. The latest progress report from 2012 indicated that concentrations of NO2 continue to exceed the objectives at all monitoring sites; however concentrations of PM10 are well within the objectives. Camden have produced an action plan (2013 – 2015) setting out the steps the Council will take to work towards improving air quality.

- 11.52 Effects on local air quality in the construction phase have been assessed as negligible providing the mitigation measures listed are included within the Construction Environmental Management Plan (CEMP) and implemented successfully.

- 11.53 The assessment considered the operational impact of emissions from boilers on local air quality which are to be installed within the proposed development. An assessment of emissions from the boilers was undertaken using the atmospheric dispersion model ADMS V5. Nitrogen dioxide concentrations were assessed in the surrounding

area of the proposed development.

- 11.54 At the area of maximum impact from the boiler, background levels of annual mean NO₂ are high and already exceed the annual mean objective. The process contribution from the on-site boilers is very small, as changes to annual NO₂ concentrations are predicted to be imperceptible. Emissions from the proposed development have also been assessed as 'air quality neutral' following supplementary planning guidance from the Greater London Authority.
- 11.55 Due to the excellent public transport links offered and the fact that on-site car parking is limited to two disabled bays, additional traffic movements associated with the operation of the development are not anticipated to be significant and the effect on local air quality will be negligible.
- 11.56 Based on the EPUK flowchart, air quality is considered to be a high priority in the planning process primarily due to the introduction of residential exposure into an area of existing poor air quality. However, mechanical ventilation has been included in the design to mitigate the potential exposure of future residents. Therefore, considering the significance of the air quality impacts according to the criteria set out in the EPUK guidance, the following points are noted:
- i. The development lies within an AQMA and local monitoring data indicates the annual mean NO₂ objective is exceeded;
 - ii. The overall magnitude of change in pollutant concentrations from the operation of boilers is imperceptible;
 - iii. The proposed development will not result in a significant increase in vehicle movements across the local road network as car parking on-site is limited to two disabled bays and public transport links within the vicinity of the development are excellent;
 - iv. New residential exposure is being introduced in the area by the proposed development; however dwellings will be mechanically ventilated; and
 - v. Amenity space such as winter gardens will be glazed to provide nominal protection; and
 - vi. The development does not interfere with the implementation of measures outlined in the AQAP.

11.57 Based on the above, the air quality is judged to be a *minor* consideration in the case of this development proposal for NO₂. It is therefore considered that the proposal meets the aspirations of both Regional and Local policy.

12 Amenity

Residential Amenity

- 12.1 Policy DP26 states that when considering applications for new developments and changes of use, the Council will require developments to provide:
- i. An acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
 - ii. Facilities for the storage of recycling, and disposal of waste;
 - iii. Facilities for bicycle storage;
 - iv. Outdoor amenity for private or communal amenity space, wherever practical.
- 12.2 The residential development has been designed to comply with the London Housing Design Guide, Lifetime Homes, wheelchair accessible policy and Code for Sustainable Homes Level 4.
- 12.3 A dedicated residential refuse store including storage for recycling is provided in the basement.
- 12.4 The proposals include 46 residential cycle spaces which are located in the basement and accessed off High Holborn from the residential core.
- 12.5 Wintergardens are proposed for each residential unit to provide private amenity with protection from noise and pollution. Shared private amenity is located on the residential 8th floor and accessed via the residential core. Further details can be found in the Design and Access Statement.

Unit Aspect

- 12.6 Given the constraints of the site and the reuse of the existing building, the south-east corner of the site was considered the most appropriate location for the affordable housing units as it offers the opportunity to provide dual aspect units.
- 12.7 The proposed scheme provides 7 (33%) dual aspect units. The remaining 14 units are therefore single aspect however all are south east facing.

- 12.8 The proposals are considered entirely acceptable given the site specific constraints and the overarching benefits of the proposal.

Daylight and Sunlight

- 12.9 At a local level, Development Policies DP26 states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The supporting text, specifically paragraph 26.3, advises that to assess whether acceptable level of daylight and sunlight are available to habitable spaces, the Council will take into account the standards recommended in the British Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011).
- 12.10 The daylight and sunlight affecting the proposed development and surrounding properties is considered within the Daylight and Sunlight Report submitted alongside this application. This report assesses the impact of the proposal in terms of daylight and sunlight to surrounding properties using both the Average Daylight Factor (ADF) and the Vertical Sky Component (VSC). The report also assesses daylight and sunlight to the proposed residential accommodation within the scheme.
- 12.11 With regard to the daylighting technical analysis of the proposed scheme on the surrounding neighbouring properties, the analysis has confirmed that a majority of the neighbouring buildings would retain daylight at levels that satisfy BRE criteria.
- 12.12 With regard to the sunlighting technical analysis of the proposed scheme on the neighbouring properties that face within 90 degrees of south would be maintained well above BRE recommendations with little or no difference between the existing and proposed values.
- 12.13 The Daylight and Sunlight Analysis has confirmed that in all locations except the front elevation of 10-12 Museum Street, the amenity values for daylight and sunlight to neighbouring residential properties would satisfy BRE criteria. The exception reflects the dense urban nature of Museum Street, with tall buildings arising from this narrow street. Even in this location the mix of VSC and daylight distribution is either BRE compliant or is typical for a central London location.

12.14 The Daylight and Sunlight Report concludes that the proposed scheme, in daylight terms has been designed to react well to the existing residential environment and therefore, the scheme is generally compliant with the existing residential area. Further details can be found in the accompanying Daylight and Sunlight Report.

Overlooking

12.15 Development Policies DP26 also applies to overlooking. The scheme has been designed to protect the existing residents in the surrounding area from overlooking. A minimum distance of 14 metres (window to window) has been incorporated into the design to prevent overlooking in accordance with Camden's Planning Guidance.

12.16 It is therefore considered that the proposals are in line with policy given its dense urban location.

Amenity Space

12.17 At a local level Policy DP31, contained within the Development Policies, states that the quantity and quality of open space, outdoor space and recreational facilities in Camden should be increased and deficiencies and under provision should not be made worse. Policy DP31 states that schemes of 5 or more additional dwellings and 500sqm or more of floorspace will be expected to make an appropriate contribution to meeting the increased demand for public open space.

12.18 Camden's Core Strategy identifies areas with an under-provision of open space as well as areas deficient of open space. In these areas on-site public open space is required. 21-31 New Oxford Street falls outside of the areas identified as deficient in public open space and therefore although the development triggers the requirement for a contribution towards open space, there is no requirement for this to be on-site.

12.19 Paragraph 31.7 and accompanying Table 1 of the Development Policies DPD also sets out other developments that are expected to provide the open space contribution on-site. On-site provision is expected for residential development adding 60 or more homes and commercial development adding 30,000 sqm or more. The proposed development at 21-31 New Oxford Street falls below both of these thresholds and therefore there is no requirement for the contribution to public open space to be on-

site.

Camden's Proposed Open Space Requirements

12.20 Camden Council has confirmed that the Applicant should be using Appendix D of CPG6 to calculate open space requirements for new employees and residents.

12.21 Using Appendix D, the proposal provides a commercial uplift of 9,769sqm which equates to a requirement to provide 380sqm of open space for new employees. This has been calculated in the following way:

Additional commercial floorspace	/ 1000 to give floorspace in thousands of sqm	X open space requirement per 1000 sqm	Total open space requirement sqm
9,769	9.769	38.9	380

12.22 Using Appendix D of CPG6, the proposal is required to provide the following public open space in connection with the proposed new residential space calculations:

Proposed number of beds	X open space requirement per home (sqm)	Total open space requirement (sqm)
11 x 1 bed	11.7	128.7
6 x 2 bed	17	102
4 x 3 bed	25.2	100.8
Total	-	331.5

12.23 Using CPG6, the proposal is therefore required to provide 711.5sqm as a contribution towards public open space. As set out above there is however, no policy requirement

for this contribution to be made on-site.

- 12.24 CPG 6 states that “on sites already covered by development, and where appropriate access may have to be restricted to the occupiers of the building, the provision of a roof garden as a contribution to public open space may be considered. If a roof garden is to be considered as public open space, as a minimum it should be able to be used by all the occupants of the building”.
- 12.25 The proposed development provides 2,529sqm of open space for the occupiers of the office accommodation in the form of outdoor terraces. The development provides 366sqm of amenity space for the residential units in the form of a communal roof terrace and wintergardens. The required contribution to meeting the increased demand for public open space is far exceeded and therefore any off-site provision or financial contribution in lieu of direct provision should not be applicable in this instance.
- 12.26 It is considered that the proposals meet the guidance contained within policy DP31 and the Camden Planning Guidance SPG, 2006/2011 and the site specific guidance.

Playspace

- 12.27 Policy 3.6 of the LP seeks to ensure that “all children have safe access to good quality, well designed, secure and stimulating play and informal recreation provision”.
- 12.28 The LP SPG ‘Providing for Children and Young People’s Play and Informal Recreation’ 2008 sets out a methodology for the calculation of play space requirements. According to this methodology, it is anticipated that the proposal will generate 12.28 children between the ages of 0 and 16 years. If the child yield was below 10 children, an appropriate financial contribution to play provision within the vicinity of the development will be required. However, as the child yield is slightly in excess of this, some on site play space will be provided.

13 Transport

Transport

- 13.1 Paragraph 29 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.
- 13.2 Paragraph 30 of the NPPF states that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.
- 13.3 Further to this, paragraph 34 states that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- 13.4 At a regional level, LP Policy 6.3 states that “development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed”. The policy also indicates that transport assessments will be required in accordance with TfL’s Transport Assessment Best Practice guidance for major planning applications.
- 13.5 Policy 6.9 states that “the Mayor will work with all relevant partners to bring about a significant increase in cycling in London”.
- 13.6 Policy 6.10 indicates that “the Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasising the quality of the pedestrian environment, including the use of shared space principle promoting simplified streetscape, de-cluttering and access for all”.
- 13.7 The Mayor’s Transport Strategy (2010) sets out policies and proposals to achieve the goals set out in the LP providing a vision of London as an exemplary sustainable world city.
- 13.8 At a local level, Core Strategy Policy CS11 seeks to promote the delivery of transport infrastructure and the availability of sustainable transport choices, to support

Camden's growth, reduce the environmental impact of travel and relieve pressure on the borough's transport network.

- 13.9 Development Policy DP16 seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links.
- 13.10 Development Policy DP17 seeks to promote walking, cycling and public transport use, and as such, development should make suitable provision for pedestrians, cyclists and public transport.
- 13.11 Development Policy DP18 states that development should provide the minimum necessary car parking provision. In the Central London Area the Council will expect development to be car free.
- 13.12 The Council will strongly encourage contributions to car clubs and pool car schemes in place of private parking in new developments across the borough, and will seek the provision of electric charging points as part of any car parking provision.
- 13.13 To assess the overall implications of developments, LBC under policy DP16, expects the submission of a Transport Assessment where the implications of proposals are significant.
- 13.14 The site is extremely well connected in terms of public transport with a PTAL rating of 6b (with 1a being the lowest accessibility and 6b being the highest accessibility). The site is within walking distance of Tottenham Court Road and Holborn underground stations and the new proposed Crossrail station at Tottenham Court Road, and 19 bus stops are within a short walk of the site.
- 13.15 In terms of provision of cycle parking, the proposal will provide for the following cycle parking spaces at basement level:
 - i. Proposed office – 398 (+16 visitor spaces)
 - ii. Proposed retail – 42 (+31 visitor space)
 - iii. Proposed residential – 46 (+2 visitor spaces)

- 13.16 In accordance with Policy 6.13 of The London Plan, there will be no car parking apart from designated bays for Blue Badge holders. The intention is to provide two Blue Badge bays in total at ground floor: one for the office use, and one for the residential units, at a rate of 5% Blue Badge provision rather than 10% for the residential units. Experience of other schemes has shown that 5% Blue Badge provision is acceptable to LBC and 10% provision at this scale of residential development in an area with such a high level of public transport accessibility is considered to exceed actual demand. Provision would be actively managed so that a decrease or increase in actual demand for Blue Badge bays could be reasonably dealt with.
- 13.17 The trip generation assessment estimates that the proposed development will generate 1,029 net additional trips during the AM peak hour. The distribution of these trips to the pedestrian, cycle and public transport networks indicates that the proposed development will have a minor impact on the operation of the local transport network.
- 13.18 For this reason, a series of proposed mitigation measures have been outlined within the Transport Assessment submitted as part of this application. These mitigation measures include a Construction and Logistics Management Plan (CMP); a Delivery and Servicing Management Plan (SMP); and a Travel Plan. Potential public realm improvements on High Holborn and New Oxford Street are also proposed.
- 13.19 It should be noted that the introduction of Crossrail at Tottenham Court Road will provide an alternative form of transport, thus increasing the transport capacity of the area.
- 13.20 The Transport Assessment demonstrates that the proposed development can be accommodated within the existing traffic and transport infrastructure surrounding the development site. This site is well served by public transport and the expected trip demands can be accommodated on the local transport network. Design proposals will help to enhance the surrounding key pedestrian network surrounding the site, and mitigation measures will address any adverse impacts on the local transport network as a result of the proposed development.
- 13.21 Overall the proposals accord with national, regional and local planning policy.

Servicing

- 13.22 At a national level, paragraph 35 of the NPPF states that developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies.
- 13.23 At a local level Policy DP20 deals with servicing and deliveries and states that the Council will expect development that would generate significant movement of goods or materials by road, both during construction and in operation, to be located close to the Transport for London Road Network or other Major Roads, accommodate goods vehicles on site and seek opportunities to minimise disruption for local communities through effective management.
- 13.24 The existing building has been vacant for 20 years and therefore no current servicing exists. It is proposed that the retail and office components of the development proposals are serviced off High Holborn (south east corner of the site), into the proposed basement and distributed accordingly.
- 13.25 The Transport Assessment concludes that the daily servicing trips will be readily accommodated off High Holborn. A comprehensive Delivery and Servicing Plan (DSP) will be provided as a condition of the planning permission in order to ensure that operational delivery activity is managed satisfactorily.

Accessibility

- 13.26 The Access Strategy for this development is based on an inclusive model of disability. Impairments are considered as individual and not categorised and as such the design philosophy seeks to achieve an inclusive design that maximises access for all disabled people. This satisfies the General Duty placed upon Camden Council under the Equality Act 2010 and the LP to promote the interests of disabled people as identified in the Corporate Disability Equality Scheme.
- 13.27 The Applicant has worked closely with LBC, the GLA Access officer and local groups to design a scheme which is inclusive.

Pedestrian Accessibility

- 13.28 The proposal incorporates separate access points for each of the uses on the site.
- 13.29 Pedestrian access to the office floorspace will be a level entrance at ground floor, off Museum Street. The entrance will be distinctive as it will be set back into the building façade.
- 13.30 Retail units will be entered by pedestrians at ground floor. Each unit will have its own entrance doors off New Oxford Street, High Holborn or Museum Street.
- 13.31 The affordable residential units will be accessed from a designated entrance at ground level off High Holborn.

Wheelchair Accessibility

- 13.32 Access into each part of the building is level and appropriate provision for lifts has been provided across the site.
- 13.33 In addition, two accessible off-street car parking bays have been provided. These bays will be allocated on a first come first served basis.

Visual Accessibility

- 13.34 Signage will be provided across the site, showing access points, the different choices available for vertical circulation, and the location of facilities and destination points.
- 13.35 Legible London is a pedestrian wayfinding system that helps people walk around London and ensures that signage is consistent and effective. It has been developed to help both residents and visitors within an area walk to their destination quickly and easily.

14 Planning Obligations

- 14.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 14.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, as amended, and paragraph 204 of the NPPF, a planning obligation should only be sought where they meet all of the following tests:
- a) Necessary to make the proposed development acceptable in planning terms;
 - b) Directly related to the proposed development; and
 - c) Fairly and reasonably related in scale and kind to the proposed development.
- 14.3 Paragraph 203 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 14.4 Under paragraph 205 of the NPPF, where obligations are being sought, local authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled.
- 14.5 Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects (Paragraph 206 NPPF).
- 14.6 Under Policy 8.2 of the LP 'Planning Obligations', boroughs should include appropriate strategic as well as local needs in their policies for planning obligations.
- 14.7 Policy 8.2 states that negotiations should seek a contribution towards the full cost of all such provision that is fairly and reasonably related in scale and kind to the proposed development and its impact on a wider area.
- 14.8 As set out in Camden Planning Guidance 8 (CPG 8) 'Planning Obligations', the use

of planning obligations is an important tool in ensuring the delivery of necessary infrastructure to support the Local Development Framework.

14.9 The use of planning obligations is specifically required through Core Strategy policy CS19 'delivering and monitoring the core strategy' although a whole range of individual development policies may be used to justify an obligation.

14.10 Core Strategy policy CS19 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to; support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and mitigate the impact of development.

14.11 The Applicant confirms that they will enter into a Legal Agreement with the Council to secure the reasonable and necessary planning obligations associated with the development in accordance with Regulation 122 of the CIL Regulations, the NPPF and Core Strategy Policy CS19.

14.12 The package of s106 contributions involved with this development will include:

- i) Provision of affordable housing on-site and payment in lieu of remaining required residential floorspace
- ii) On site public realm improvement works
- iii) Service Management Plan
- iv) Construction Management Plan
- v) Green Travel Plan
- vi) Car-free housing
- vii) Sustainability Plan
- viii) Energy Plan
- ix) Employment and Training
- x) Local procurement

14.13 The development will require Mayoral CIL payment in accordance with the Community Infrastructure Levy Regulations 2010 as amended.

15 Summary and Conclusions

- 15.1 The Applicant has instructed AHMM to design a scheme at 21-31 New Oxford Street which is an adaptive reuse of the existing building and provides a sustainable mix of uses by providing high quality office accommodation, a mix of active public uses such as shops, restaurants and galleries and 100% of the affordable housing requirement, within a central London location, whilst having regard to national, regional and local planning policy.
- 15.2 The existing poor quality, vacant building will be regenerated and the proposals present an opportunity to reinvigorate this important part of Central London. At a regional level, the LP prioritises development in locations which are well served by public transport. The building has excellent public transport links and is located within the Tottenham Court Road Opportunity Area.
- 15.3 The Tottenham Court Road Opportunity Area identifies and promotes the site and surrounding area as being capable of accommodating substantial development to provide new jobs or homes. The London Plan notes that these areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density, both of which apply to the application site.
- 15.4 At a local level, the proposals are at the heart of the strategic Core Strategy objective. These objectives are met through:
- i. Creating a sustainable development which adapts to a growing population and reuses an existing building;
 - ii. Providing a range of employment opportunities across a range of employment sectors;
 - iii. Providing a range of open spaces and encouraging walking and cycling, enabling people to lead active healthy lives; and
 - iv. Creating a safe and secure environment for existing and future residents and workers.
- 15.5 As set out in the Site Allocations DPD, the Council has aspirations to improve the public realm around this site and particularly to enhance the east-west and north-

south routes for pedestrians. In accordance with this objective, the development will create a distinctive place, with outstandingly well-designed public realm at its heart on Museum Street as well as aspirational improvement works to the north and south.

- 15.6 In this context it is considered that the development will make a significant contribution to both Camden and to London by resolving the dysfunctional lack of connectivity between Bloomsbury, Covent Garden and Holborn through the creation of a place of character with improved movement and connections between people and places. It is envisaged that the proposed public realm works will change the balance of space from motor vehicles to pedestrians and cyclists and in doing so improve the street environment, both for those living and working in the area, by 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 (Site Allocations DPD).
- 15.7 The proposal demonstrates that it satisfies and exceeds planning policies at national, regional and local levels.
- 15.8 The application accords with national, regional and local policy objectives to deliver sustainable, mixed use and balanced communities.



Appendix A – Planning History

Application registered	Reference No	Type of Application	Description	Decision	Date of Decision
13.01.1984	8480005	Advertisement consent	Display of two internally illuminated single side signs measuring 2.438m x 1.524m at a height of 4.2m off the ground located in the recess area to the corner front- ages of Museum Street and New Oxford Street/High Holborn.(As shown on your unnumbered drawing).	Granted	15.02.1984
07.09.1990	9080072	Advertisement consent	Four externally spotlight signs at roof level showing 'Royal Mail' corporate logo two on New Oxford Street and High Holborn frontages and two on Museum Street frontage< as shown on drawing numbers 2322/1 2 3 4 and 5.	Granted	17.01.1991
01.06.1994	9400787	Full application	Formation of street level entrance to mail track and installation of partial boxes on the Museum Street elevation. as shown on drawing numbers 8369/SK/5A.	Granted	17.06.1994
21.02.1995	9500266	Full application	Change of use from post office sorting office to a museum support centre on basement ground first second third and mezzanine floors; to retail purposes (Classes A1 A2 and A3 of the Town and Country Planning (Use Classes) Order 1987) on 2 000 square metres of the ground floor fronting Museum Street; and to	Granted (Appeal lodged against grant of permission subject to conditions) - Not implemented.	25.05.1995



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			use for purposes within the meaning of Class B1 of the Town and Country Planning (Use Classes) Order 1987 on the fourth fifth and sixth floors as shown on existing unnumbered floorspace plans as revised by letter dated 5 May 1995.		
13.12.1995	9502076	Full application	A change of use from post office sorting to a mixed use development incorporating retail (A1,A2,A3), B1, leisure and hotel. (Plans submitted)	Withdrawn	N/A
11.04.1997	PS9704327	Full application	Change of use, and works of conversion, from post office sorting depot and offices to a mixed use development, including museum study centre with storage and ancillary uses (Class D1), retail (Class A1 to A3), offices (Class B1), and hotel (Class C1) accommodation. (REVISED DESCRIPTION).	Withdrawn	(revision received 19.06.1997)
31.07.1997	PS9704327R2	Full application	Change of use and works of conversion from post office sorting depot and offices to a mixed use development comprising a Museum Study Centre with storage and ancillary uses (Class D1), uses within Classes (A1, A2 and A3), offices (Class B1) fitness club (Class D2) and hotel accommodation (Class C1), as shown on drawing numbers PL(02)00, SV(03)/01 to /14, SK(05)/02 to /05, PL(03)/0B, /00E, /02, PL(03) PL(03)/03 to /11, PL(04)01, /02, PL(05)01 to /04, PL(05)05 B and PL(05)08.	Withdrawn	(revision received 07.09.1998)
04.09.1998	PS9704327R3	Full application	Change of use and works of conversion from post office sorting depot and offices to a mixed	Granted with S106	08.04.1999



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			use development comprising a Museum Study Centre with storage and ancillary uses (Class D1), uses within Classes (A1, A2 and A3), offices (Class B1) fitness club (Class D2) and hotel accommodation (Class C1), as shown on drawing numbers 97119/2, 726/PL(02)00, 726/SV(03)/01-14, 726/SK(05)/02-05, 726/PL(03)/0BC, 00K, 01B, 02-07, 08A, 09A, 10A & 11C, 726/PL(04)/01A & 02A, and 726/PL(05)/01B, 02B, 03B & 04C.	implemented.	
23.11.1998	PS9805146	Full application	Erection of roof top screened plant areas as an amendment to conditional planning permission for the provision of a study centre together with a hotel and third party users dated 8th April 1999 (Reg No.PS9704327R3), as shown by drawing numbers PL(02)00, PL(03)11D, PL(04)02B, PL(05)01C, PL(05)02C, PL(05)03C and PL(05)04D.	Granted	10.06.1999
11.06.1999	PS9904572	Discharge of condition	The submission of details of facing materials, pursuant to additional condition 04; details of cycle stands pursuant to condition 06; and details of access for disabled persons, pursuant to additional condition 08 of planning permission dated 8th April 1999 (Reg.no.PS9704327R3), as shown on drawing numbers PL(03)00 rev M, PL(05)/03 rev D, /01 rev D, /02 rev D, /01 rev E, /05 rev F, /06 rev C, /08 rev B, PL(03)08 rev A, /10 rev B; and disabled access report from Tate & Hindle (ref.726L1/092/RF) dated 10th June 1999; and	Granted	24.08.1999



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			material samples.		
26.01.2000	PSX0004104	Renewal of planning permission	The renewal of planning permission dated 26th May 1995 (Ref.No.PL/9500266/R1) for the change of use from post office sorting office, to a museum support centre on basement, ground, first, second, third and mezzanine floors; to Class A1 (retail), A2 (financial & professional services), and A3 (restaurant) of 2.000m2 of the ground floor fronting Museum Street; and to Class B1 (business use) on 4th, 5th, and 6th floors, as shown by 10 unnumbered drawings.	Granted	20.06.2000
10.06.2002	ASX0204738	Advertisement consent	The erection of two externally illuminated banner signs at the junctions of Museum Street and New Oxford Street, and Museum Street and High Holborn, for a temporary period of one year. As shown on site location plan, and Perspective Sketches of High Holborn/Museum Street elevations, and New Oxford Street/Museum Street elevations.	Refused	29.07.2002
July 2000	Unknown	Full application	Change of use to a mixed use comprising museum study centre (D1), A1, A2, A3 uses, B1 offices B1c workshops and storage (B8).	Granted	01.02.2001
14.01.2004	2004/0269/P	Full application	Change of use from G.P.O. sorting office use (sui generis) to office use (Class B1) on first floor and first floor mezzanine, incorporating related works to create a new ground floor reception/entrance, relocation of existing vehicle entrance, alterations to the facade, and installation of new ventilation/air conditioning plant.	Withdrawn	22.04.2004



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19.07.2010	2010/3606/A	Advertisement consent	Temporary display of externally illuminated banners on the High Holborn and New Oxford Street elevation for a period of 2 months from 04/10/2010 to 04/12/2010	Granted	03.09.2010
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Appendix B – Relevant Planning Policies

London Plan Policies

- Policy 1.1 Delivering the strategic vision and objectives for London
- Policy 2.1 London in its global, European and United Kingdom context
- Policy 2.3 Growth areas and co-ordination corridors
- Policy 2.9 Inner London
- Policy 2.10 Central Activities Zone – strategic priorities
- Policy 2.11 Central Activities Zone – strategic functions
- Policy 2.13 Opportunity areas and intensification zones
- Policy 2.15 Town Centres
- Policy 3.1 Ensuring equal life chances for all
- Policy 3.2 Improving health and addressing health inequalities
- Policy 3.3 Increasing housing supply
- Policy 3.4 Optimising housing potential
- Policy 3.5 Quality and design of housing developments
- Policy 3.6 Children and young people’s play and informal recreation facilities
- Policy 3.8 Housing choice
- Policy 3.9 Mixed and balanced communities
- Policy 3.10 Definition of affordable housing
- Policy 3.11 Affordable housing targets
- Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes
- Policy 3.13 Affordable housing thresholds
- Policy 3.15 Coordination of housing development and investment
- Policy 4.1 Developing London’s economy
- Policy 4.2 Offices
- Policy 4.3 Mixed use development and offices
- Policy 4.7 Retail and town centre development
- Policy 4.8 Supporting a successful and diverse retail sector
- Policy 4.9 Small shops
- Policy 5.1 Climate change mitigation
- Policy 5.2 Minimising carbon dioxide emissions
- Policy 5.3 Sustainable design and construction
- Policy 5.4 Retrofitting

- Policy 5.5 Decentralised energy networks
- Policy 5.6 Decentralised energy in development proposals
- Policy 5.7 Renewable energy
- Policy 5.8 Innovative energy technologies
- Policy 5.12 Flood risk management
- Policy 6.1 Strategic approach
- Policy 6.3 Assessing effects of development on transport capacity
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.13 Parking
- Policy 7.1 Building London's neighbourhoods and communities
- Policy 7.2 An inclusive environment
- Policy 7.3 Designing out crime
- Policy 7.4 Local character
- Policy 7.5 Public realm
- Public 7.6 Architecture
- Policy 7.7 Location and design of tall and large buildings
- Policy 8.1 Implementation
- Policy 8.2 Planning obligations
- Policy 8.3 Community infrastructure levy

Camden Core Strategy

- CS1 Distribution of growth
- CS2 Growth areas
- CS5 Managing the impact of growth and development
- CS6 Providing quality homes
- CS7 Promoting Camden's centres and shops
- CS8 Promoting a successful and inclusive Camden economy
- CS9 Achieving a successful Central London
- CS10 Supporting community facilities and services
- CS11 Promoting sustainable and efficient travel
- CS13 Tackling climate change through promoting higher environmental standards
- CS16 Improving Camden's health and well-being

- CS17 Making Camden a safer place
- CS18 Dealing with our waste and encouraging recycling

Camden Development Policies

- DP1 Mixed use development
- DP2 Making full use of Camden's capacity for housing
- DP3 Contributions to the supply of affordable housing
- DP5 Homes of different sizes
- DP6 Lifetime homes and wheelchair homes
- DP10 Helping and promoting small and independent shops
- DP12 Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses
- DP13 Employment sites and premises
- DP15 Community and leisure uses
- DP16 The transport implications of development
- DP17 Walking, cycling and public transport
- DP18 Parking standards and limiting the availability of car parking
- DP22 Promoting sustainable design and construction
- DP24 Securing high quality design
- DP26 Managing the impact of development on occupiers and neighbours
- DP28 Noise and vibration
- DP29 Improving access
- DP30 Shopfronts
- DP31 Provision of, and improvements to, open space, sport and recreation
- DP32 Air quality and Camden's Clear Zone

Supplementary Planning Policies

- Tottenham Court Road Station and St Giles High Street Area Planning Framework (adopted 2004);
- 21-31 New Oxford Street Planning Brief adopted July 2004.
- St Giles to Holborn Place Plan adopted October 2012;
- Camden Planning Guidance 1 (CPG1) – Design;
- Camden Planning Guidance 2 (CPG2) – Housing;
- Camden Planning Guidance 3 (CPG3) – Sustainability;

- Camden Planning Guidance 5 (CPG5) – Town centres, retail and employment;
- Camden Planning Guidance 6 (CPG6) – Amenity;
- Camden Planning Guidance 7 (CPG7) – Transport; and
- Camden Planning Guidance 8 (CPG8) – Planning Obligations.