

GREATER **LONDON** AUTHORITY

Development, Enterprise and Environment

Christopher Heather
Regeneration and Planning
Culture and Environment
Camden Council
Second Floor
5 Pancras Square
London
N1C 4AG

Our ref: D&P/3373/JF01
Your ref: 2014/5946/P
Date: 5 November 2014

Dear Christopher,

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

The Former Royal Mail Sorting Office, 21-31 New Oxford Street, London, WC1A 1BA

Local planning authority reference: 2014/5946/P

I refer to the copy of the above planning application, which was received from you on 26 September 2014. On 5 November 2014, the Mayor considered a report on this proposal, reference D&P/3373/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that while the application is broadly supported in strategic planning terms, there are some outstanding issues that need to be resolved and these are set out in paragraph 49 of the above-mentioned report.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Victoria Bates, e-mail victoriabates@tfl.gov.uk, telephone 020 3054 3649.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Colin Wilson

Senior Manager– Development & Projects

cc Andrew Dismore, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
Alex Neal, Gerald Eve, 72 Welbeck Street, London, W1G 0AY

5 November 2014

Former Royal Mail Sorting Office, New Oxford Street

in the London Borough of Camden

planning application no. 2014/5946/P

Strategic planning application stage one referral

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

The proposal

Remodeling, refurbishment and extension of existing former postal sorting office, including the formation of new terraces, winter gardens, roof top plant and new entrances in connection with the change of use of the building to offices (Class B1), retail/restaurant uses (Classes A1/A3) and 21 affordable housing units (Class C3), along with associated highway, landscaping, and public realm improvement works.

The applicant

The applicant is **New Oxford Street Ltd** and the architect is **Alford Hall Monaghan Morris**.

Strategic issues

The proposed retention, refurbishment and extension of the former sorting office to provide an office-led mixed-use development including the provision of onsite affordable housing is generally supported in strategic planning terms.

Issues with respect to the maximum reasonable amount of **affordable housing, play space inclusive design, sustainable development** and **transport** should, nevertheless, be resolved before the application is referred back to the Mayor at his decision making stage.

Recommendation

That Camden Council be advised that while the application is broadly supported in strategic planning terms, there are some outstanding issues that need to be resolved and these are set out in paragraph 49 of this report.

Context

1 On 26 September 2014 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 5 November 2014 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1B of the Schedule to the Order 2008: *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises the erection of a building or buildings in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres."*

3 Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is the former Royal Mail Sorting Office located at 21-31 New Oxford Street in Central London. It forms part of a triangular city block bound by New Oxford Street to the north, High Holborn to the south and Museum Street to the west. Immediately to the east is the Commonwealth House office building. The site sits at the junction of the Bloomsbury, Kingsway, Seven Dials and Denmark Street Conservations Areas; however, it is not within one itself.

6 The site is well served by public transport, with 26 bus routes operating within a reasonable walking distance of the site. The nearest bus stop is located at Bloomsbury Way/New Oxford Street and provides access to routes 1, 8, 19, 25, 38, 55, 98 171 and 242. The nearest station is Holborn, located 325 metres from the site which is served by the Central and Piccadilly lines. Tottenham Court Road, served by the Central and Northern lines and Crossrail services from 2018, is also located 430 metres from the site. On this basis, the site has a high public transport accessibility level of 6b, on a scale of one to six, where one is low. The nearest cycle hire docking station is adjacent to the southern boundary of the site.

7 The site is currently occupied by the former sorting office building, which is ground plus seven storeys and has been vacant for two decades. The first three storeys are double-height and accommodate mezzanine levels, and therefore the building has the scale of a ten storey building and stands at 65 metres tall. Due to the building's previous function there is access to Mail Rail which runs underneath the building. It is understood that access to Mail Rail must and will remain part of any future development.

Details of the proposal

8 The proposals are for the refurbishment, remodelling and extension of the existing postal sorting office in association with its change of use to a mixed-use office building comprising 35,568 sq.m. of B1 office space, 4,514 sq.m. of retail and restaurant uses at the ground floor and 21 affordable housing units. The proposed building will be nine storeys in height; however, the building is larger in scale due to the existing floor to ceiling heights at ground, first and second floor described above and the introduction of a mezzanine at the new ninth floor. The proposals also include the public realm improvements along Museum Street, the opening up of Dunn's Passage to the western site boundary and a rooftop garden/terrace for the shared use by the tenants of the building.

9 The proposed retail floorspace will wrap around the office lobby at the ground floor level, with the office space occupying the remainder of the proposed floorspace, except for the residential element. This will be located at the south-eastern corner of the site in the form of an eight storey block constructed within the existing building. Due to the difference between the floor to ceiling heights of the existing building and the heights required for residential use, the proposed residential building will only reach the fifth storey of the existing building; the floors above the residential units will be office floorspace.

Case history

10 The applicant initially engaged in pre-application discussions with GLA officers regarding the proposals for the application site in April 2014. The discussions concluded that the principle of the adaptive reuse and extension of the existing building to provide an office-led mixed-use redevelopment including the provision of on-site affordable housing was in general accordance with strategic planning policy and supported. However, as outlined in the report, there were outstanding concerns specifically relating to urban design and further information and clarification was sought with regards to affordable housing, inclusive design, sustainable development and transport which should be addressed.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- | | |
|----------------------------|--|
| • Principle of development | <i>London Plan</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Providing for Children and Young People's Play and Informal Recreation SPG</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context, SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Inclusive access | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG</i> |
| • Crossrail | <i>London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG</i> |

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2010 Camden Core Strategy, the 2010 Camden Development Policies Document and the 2011 London Plan with 2013 alterations.

13 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework
- The draft Further Minor Alterations to the London Plan (January 2014).

Principle of development

14 At the strategic level, London Plan policies support office rejuvenation within the Central Activities Zone (CAZ) to improve the quality and flexibility of office stock to address the distinct needs of the central London office market. Strategic policy also acknowledges and seeks to support the diverse range of uses that exist within the CAZ, with strategic priority also afforded to retail use. London Plan Policy 3.3 provides strategic support for the provision of housing within London.

15 As described above, the proposals seek to reuse and extend the existing building to provide an office-led mixed-use redevelopment of the former sorting office. The proposed mix of uses will provide an uplift of 35,568 sq.m. of office floorspace and 4,514 sq.m. of A1/A3 retail floorspace over the current now defunct sui generis sorting office use. The proposals will also provide 21 affordable housing units, including family-sized accommodation.

16 Therefore, noting London Plan policies regarding the Central Activities Zone and housing, the principle of an office-led, mixed-use redevelopment including residential as proposed at this site is generally supported.

Affordable housing

17 The residential component of the scheme will deliver 21 affordable housing units and the applicant has provided the following accommodation schedule indicating the proposed unit mix and tenure.

Unit size	Affordable rent	Intermediate	Total
One bed	7	4	11
Two bed	2	4	6
Three bed	4	0	4
Total	13	8	21

18 As expressed at the pre-application stage, given the strategic priority afforded to maximising affordable housing delivery within the London Plan, officers expect that any proposed affordable housing contribution represents the maximum reasonable amount and is underpinned by a detailed and robust financial viability appraisal. The applicant has submitted an appraisal to the Council and in accordance with London Plan Policy 3.12 this should be independently assessed on behalf of the Council and the results shared in full with GLA officers prior to determination.

Tenure

19 The residential units, of which all will be an affordable housing product, will be delivered on a balance of 62% affordable rent and 38% intermediate (shared ownership) units. This is in general accordance with London Plan Policy 3.11 which states that 60% of the affordable housing should be social/affordable rent and 40% should be for intermediate rent or sale, and is welcomed.

Housing choice

20 The residential mix has been developed in consultation with Camden Council housing officers in order to develop an appropriate mix that meets local housing needs in this location and it is understood that the Council are content with the proposed unit mix.

21 London Plan Housing policies 3.8 and 3.11 and the strategic guidance set out within the Mayor's Housing SPG (2012) seek to provide affordable family accommodation in London. Based on the submitted accommodation schedule, 30% of the affordable rent units will be family-sized and is welcomed in accordance with strategic housing policy.

Residential quality

22 On review of the submitted material, the proposed residential units appear to be of a high residential quality. The entrance to the core is legible and accessed directly from the street and all units have sufficient direct sunlight and access to private amenity space which is welcomed. As requested at the pre-application stage the applicant has provided a detailed assessment demonstrating how the units meet the standards set out in the London Plan and Housing SPG regarding design and unit size, which is welcomed. The applicant should provide a floorspace schedule for the 21 units to demonstrate their actual size in order to confirm compliance with the Mayor's minimum space standards.

Children's play space

23 Using the methodology in Appendix Two of the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), the applicant has calculated an anticipated child yield from the development of twelve, which generates a play space requirement 118 sq.m. As the child yield for the development is more than ten, it is expected that an element of play space for children under five years old should be provided on site. The applicant has not provided the accompanying age breakdown of the children; however, officers calculate that of the twelve children anticipated to live at the development, five would be less than five years old. Therefore, at least 50 sq.m. of dedicated play space should be accommodated on site. The applicant has stated that *"some on site play space will be provided"* to address this policy requirement, however no further detail has been provided at this stage. Therefore, further information demonstrating how the onsite play space requirements will be met is required before this aspect of the scheme can be appropriately assessed.

Urban design

24 As described in paragraphs seven and eight of this report, the proposed development involves the retention and refurbishment of the existing building including a one storey double height extension at roof level, to create a ground plus eight storey structure, plus roof level plant (ground plus eleven storeys including mezzanine levels).

25 The ground floor of the building is carefully designed to encourage pedestrian activity on all three surrounding streets by locating lobbies and retail uses along them, which is welcomed. Given the central London location of the site there should be enough demand for these units to ensure they are not left unoccupied. The applicant has acknowledged that flexibility of the retail space will be key to catering for variations in demand and to ensuring the units are let in order to ensure the surrounding public realm is animated. The applicant has provided different sections of the units demonstrating how they will be flexible enough to cater for different uses such as retail, restaurant and gallery spaces and stated that the retail space will be able to accommodate a mix of units sizes to cater for different operators. This emerging strategy is welcomed and should help limit any extended periods of potential vacancy.

26 The office entrance is accessed from Museum Street which will be transformed into a high quality pedestrian priority space with public seating and tree planting. Whilst this will continue to be a vehicular route the design of the street has been carefully considered to ensure that vehicular traffic will not prejudice the quality of the space. Since the pre-application stage, the site boundary has been extended to include all of Museum Street South to ensure that the welcomed public realm improvements for this street will be delivered as part of this scheme. In addition, the pavements along New Oxford Street and High Holborn have also been incorporated within the site boundary and will be repaved and all street furniture rationalised as part of the development which is also welcomed.

27 In addition to the above public realm enhancements set out above, the development proposes to open up the historical Dunn's Passage which runs immediately to the east of the site between the sorting office and Commonwealth House. This was discussed at length during the GLA pre-planning application meeting, and while welcomed in principle, officers were concerned that the potential lack of activity and overlooking along it may result in the route becoming a magnet for anti-social behaviour. It is apparent that further consideration has been given to activating this route as much as possible and this is strongly welcomed. It is also understood that the application has since been submitted for the Commonwealth House site that includes proposals to open up and activate this route further which is strongly supported.

28 The submitted plans show that the corner retail unit on the north end of the passage has been wrapped to extend along the route as much as possible and will be fully glazed to maximise the amount of natural surveillance on to it. The proposed location of an entrance to this unit on Dunn's Passage is also welcomed. The glazed residential lobby will also wrap the southern corner of the passage and will bring further natural surveillance to southern portion of the route. These proposed design measures have sought to minimise the extent of blank frontage along this narrow route and will help animate and maximise the sense of overlooking along it. As a result, the concerns raised at the pre-application stage have been allayed. The applicant is however, encouraged to continue dialogue with the owners of Commonwealth House to ensure that the future proposals for the adjacent site do not undermine the design interventions proposed but complement the aspirations to reinstate a historic pedestrian route that feels safe and welcoming. Any further information on the emerging proposals on the adjacent frontage would be welcomed.

29 The height and massing of the scheme is approximately ten metres higher than the existing building but will remain lower in height than the adjacent Travelodge building. The top half of the building is set back except for the corner at the junction of Museum Street and New Oxford Street which has been designed to landmark this junction. Whilst this approach was generally welcomed at the pre-application stage, officers expressed some concern that this corner of the building would appear disproportionate with surrounding buildings in the adjacent conservation area and in views of the building along New Oxford Street from the west. The applicant has since submitted a full townscape assessment showing the building in its existing and proposed context from local and extended views and officers are satisfied that the proposed height and massing will not have a significantly detrimental impact on the streetscape.

30 As expressed previously, the appearance of the building has been carefully considered, creating a simple and elegantly proportioned metal clad building with large double height glazed openings. The quality of the materials and detailing will be critical to the final appearance of the building and the applicant is advised to dedicate resources to ensure these are of the highest quality possible.

Inclusive design

31 The design and access statement demonstrates that inclusive design principles have been considered throughout the design proposals and will be embedded within the detailed design of the scheme in order to ensure that the office, retail and residential uses will be accessible by all. A specific access consultant has also helped inform the proposals and will continue to collaborate with applicant through the detailed design stages. This is welcomed and officers are content with the proposals from an inclusive design perspective at this stage. However, the Council should ensure that the measures set out in the submitted access statement are secured via condition to ensure they are built through to the final scheme.

32 The applicant has confirmed that two of the affordable housing units will be wheelchair accessible, which equates to 10% of the overall provision and it has been demonstrated that all units will meet the relevant Lifetime Homes Standards. This is welcomed.

Sustainable development

33 As the proposals involve the refurbishment of an existing building, the carbon reduction target set out in London Plan Policy 5.2 does not apply, however, the energy strategy has been developed in line with the energy hierarchy which is welcomed. The development is estimated to achieve an 11.4% in regulated carbon emissions compared to a 2013 Building Regulations compliant development through energy efficiency measures and the use of renewable technologies.

34 However, the applicant should clarify why the heating consumption and associated emissions for the commercial use has increased by more than three times compared to baseline emissions.

District heating and site network

35 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available, which is welcomed.

36 The heating for the domestic and commercial areas is to be supplied from central energy centre via a site heat network, which would make future connection to a district heating system technically feasible. The applicant should provide a drawing showing the proposed route of the network linking the domestic and non-domestic spaces. It is not proposed that the small retail areas (6% of proposed floor area) are connected to the site heat network. Given the small and intermittent nature of these heat demands, this is accepted.

37 The applicant has investigated the feasibility of combined heat and power technology (CHP). However, due the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

Transport

38 The car free nature of the scheme is supported in accordance with London Plan Policy 6.13. The applicant is nonetheless, proposing one residential and one commercial blue badge space located on site and accessed from High Holborn. In accordance with the London Plan Housing SPG, it is requested that the applicant provides an additional blue badge space. The provision to exclude residents from obtaining a residents/business parking permit for any existing or proposed controlled parking zone within the associated section 106 agreement is also supported.

39 The proposal will provide 535 cycle parking spaces in line with the emerging standards in the draft further alterations to the London Plan (January 2014) which is welcomed. The majority of the cycle stands will be located in the basement with access via a lift from New Oxford Street and associated shower and changing facilities provided in accordance with London Plan Policy 6.9. The visitor spaces will be located at grade.

40 Having reviewed the trip generation provided in the transport assessment, Transport for London (TfL) is satisfied that the proposals will not create a specific capacity issue on bus or underground networks. The application site is close to the central line tunnels and subject to details of any construction methodology; TfL is satisfied that the impact on underground infrastructure will be managed.

41 As part of the applicant's public realm improvements to High Holborn, the relocation of the adjacent docking station referred to in paragraph six is proposed. TfL has no objection to the principle of this subject to the applicant meeting TfL's relocation cost of £55,000 and all costs incurred through loss of revenue following the closure of the existing station, estimated to be £30,000 (subject to the duration of the closure). TfL also requests that the relocated docking station is extended by an additional eight docking points, which is expected to cost approximately £50,000. The relocation and expansion of the docking station should be secured through the section 106 agreement.

42 The completion of a pedestrian (PERS) audit of the surrounding area is welcomed and it is recommended that the Council secure any improvements highlighted, including wayfinding, through the section 106 agreement. In addition, the submission of a framework travel plan which has passed the ATTrBuTE assessment is welcomed and a full travel plan should be secured as part of the above agreement.

43 It is understood that all servicing and delivery vehicles will access the building on High Holborn and therefore a delivery and servicing plan and a full construction logistics plan should be secured by planning condition in accordance with London Plan Policy 6.14.

Crossrail

44 The site is located within an area where section 106 contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the Crossrail SPG and the development involves a net increase in chargeable floorspace of more than 500 sq.m. gross internal area. The indicative charge for sites within the Central London Charging area is £140 per sq.m. for offices and £90 per sq.m. for retail. From the submitted details, TfL notes that the site has been vacant for approximately twenty years and therefore the contribution will be calculated from a theoretical existing floor space of zero. The applicant should therefore specify a schedule of the existing, retained and new floorspace proposed in order for TfL to calculate the Crossrail contribution. This sum should be specified within the section 106 agreement.

45 The Mayor has also introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3 and the charging rate for Camden is £50 per sq.m.

Local planning authority's position

46 The local planning authorities position is unknown at the time of writing.

Legal considerations

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

Financial considerations

48 There are no financial considerations at this stage.

Conclusion

49 London Plan policies on Central Activities Zone, housing, affordable housing, urban design, inclusive design, sustainable development and transport are relevant to this application. While the application is generally supported, there are some outstanding issues that need to be resolved and these and their potential remedies are set out below:

- **Principle of development:** The proposed refurbishment and extension of the existing sorting office building to provide an office-led, mixed-use redevelopment including the provision of onsite affordable housing is in general accordance with strategic planning policies regarding the CAZ and housing and is generally supported.
- **Affordable housing:** The prioritisation of the delivery of affordable housing on site is welcomed and the proposed tenure and unit mix is supported. The supporting financial viability report should be independently assessed on behalf of the Council to verify that the proposed offer is the maximum reasonable amount achievable. In addition, the applicant should provide a floorspace schedule to demonstrate the actual size of the units in order to confirm compliance with the Mayor's minimum space standards.
- **Play space:** In line with the above comments further information should be provided demonstrating how the onsite play space requirements will be met is required before this aspect of the scheme can be appropriately assessed.
- **Design:** As set out above, the applicant has addressed the design concerns raised at the pre-application stage and the scheme is generally supported in strategic urban design terms and will also deliver welcome public realm improvements around the site. The applicant is encouraged to continue dialogue with the adjacent site owners to ensure the delivery of a successful and safe pedestrian route along Dunns Passage.

- **Inclusive design:** The applicant has submitted a detailed access statement prepared by an access consultant demonstrating that inclusive design principles will be embedded within the detailed design of the scheme. As a result Officers are content with the proposals from an inclusive design perspective; however, the Council should ensure that the measures set out in the submitted access statement are secured via condition to ensure they are built through to the final scheme.
- **Sustainable development:** As the proposals involve the refurbishment of an existing building, the carbon reduction target set out in London Plan Policy 5.2 does not apply. While the broad approach set out in the energy strategy is supported, the applicant should clarify why the heating consumption and associated emissions for the commercial use has increased by more than three times compared to baseline emissions and provide a diagram showing the proposed route of the site heat network linking the domestic and non-domestic spaces.
- **Transport:** The car free nature of the scheme is supported and TfL are satisfied that the proposals will not have an impact on bus or underground networks. However, the applicant is requested to provide a further disabled parking space and meet the costs associated with the proposed relocation and extension of the adjacent cycle hire docking station which should be secured within the section 106 agreement. The Council should secure any improvements highlighted by the PERS audit and the submission of a full travel plan within the section 106 agreement and a delivery and servicing and full construction logistics plan by planning condition.

for further information, contact GLA Planning Unit (Development & Projects Team)

Colin Wilson, Senior Manager – Development & Projects

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Jonathan Finch, Case Officer

020 7983 4799 email jonathan.finch@london.gov.uk
