

GREATER LONDON AUTHORITY

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

Our ref: D&P/3373/JF03
Your ref: 2014/5946/P
Date: 2 March 2015

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 your letter of 19 February 2015 informing the Mayor that Camden Council is minded to grant planning permission for the above planning application. I refer you also to the notice that was issued on 20 February 2015 under the provisions of article 5(1)(b)(i) of the above Order.

The Mayor has delegated his planning powers to me and having now considered a report on this case (reference D&P/3373/02), I am content to allow Camden Council to determine the case itself, subject to any action that the Secretary of State may take, and do not therefore wish to direct refusal.

Yours sincerely



Sir Edward Lister
Deputy Mayor and Chief of Staff

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

Former Royal Mail Sorting Office, 21-31 New Oxford Street, Bloomsbury

in the London Borough of Camden

planning application no. 2015/5946/P

Strategic planning application stage II 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 issues raised at the consultation stage regarding **affordable housing, urban design, inclusive design, sustainable development** and **transport** have been resolved through further revisions, the provision of further information and details secured by planning condition or section 106 legal agreement and the application is now considered acceptable in strategic planning terms.

The Council's decision

In this instance Camden Council has resolved to grant permission.

Recommendation

That Camden Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

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. This was referred to the Mayor 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.”*

2 On 5 November 2014 the Mayor considered planning report D&P/3373/01, and subsequently advised Camden Council that while the application was broadly supported in strategic planning terms, there were some outstanding issues that needed to be resolved and these were set out in paragraph 49 of the above-mentioned report.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised in response to the Mayor’s concerns (see below). On 12 February 2015 Camden Council decided that it was minded to grant planning permission, for the revised application, and on 19 February 2015 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Camden Council under Article 6 to refuse the application or issue a direction to Camden Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 4 March 2015 to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA’s website www.london.gov.uk.

Update

5 At the consultation stage Camden Council was advised that while the application was broadly supported in strategic planning terms, there were some outstanding issues that needed to be resolved and these were set out in paragraph 49 of the above-mentioned report:

- **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:** 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.

6 It is important to note that since the initial consultation stage, the scheme has been subject to a number of revisions to address consultation responses and these are commented on below. This is in addition to comments on how the scheme has responded to the issues raised within the stage one report outlined above.

7 A fully accessible doctor's surgery will now be included within the proposed mix of uses, which did not form part of the original proposals referred to the Mayor. It is understood that the introduction of this use is in response to local consultation which identified a need for a new doctor's surgery in the area. This is therefore welcomed in accordance with London Plan Policy 3.16 which seeks to protect and enhance social infrastructure provision.

8 In addition to the above, the revised scheme will also secure a designated area of at least 350 sq.m. for the provision of small independent retail units of no larger than 75 sq.m. at the ground and mezzanine levels with frontage onto High Holborn within the section 106 agreement. Again, this is in response to local consultation which emphasised the desire for local independent retailers in the area and accords with local planning policy aspirations to support independent businesses and a choice and variety of shopping facilities.

9 Most notably the revised scheme introduces a publicly accessible roof terrace that will provide new views across London's skyline and is to be secured within the section 106 agreement. This is strongly welcomed as a significant planning benefit of the proposed development and will not only provide valuable public amenity space within the Central Activity Zone and new views over Bloomsbury, but also a new public attraction to the area.

Housing

Affordable housing

10 With regards to affordable housing, since the Mayor's initial consultation response, the Council has concluded its independent assessment of the supporting financial viability appraisal for the proposals and shared this in full with the GLA. This appraisal also took account of the revisions made to the scheme mentioned above. The Council's consultants agree that the full quantum of housing to be provided onsite required by its mixed use Policy DP1 is not feasible due to a combination of architectural and viability reasons and that the applicant has thoroughly explored several opportunities of trying to achieve it. As a result, the review concludes the an in-lieu payment to meet the shortfall in housing is appropriate in the absence of a suitable site nearby to deliver it and that the proposed affordable housing offer, which meets 100% of the Council's affordable housing policy requirement, is the maximum reasonable amount. This is welcomed and the scheme is therefore in compliance with London Plan Policy 3.12.

Residential standards and play space

11 As requested at the consultation stage, the applicant has provided a detailed accommodation schedule that demonstrates that the residential units will meet the minimum space standards set out in the London Plan and the Housing SPG which is strongly welcomed. In addition it is acknowledged that 50 sq.m. of dedicated play space for children under five years old will be provided within the communal residents terrace located on the south-east corner of the roof which is also welcomed. The details of the landscaping treatment to the roof terrace including the provision for play space is secured by planning condition and in discharging this condition the Council should ensure that the proposed play space will provide a safe and stimulating environment for young children in accordance with the principles of the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012).

Urban design

12 As set out in the Mayor's initial consultation response, the concerns discussed at the pre-application stage regarding Dunn's Passage were satisfactorily addressed in the original submission, however, the applicant was encouraged to continue dialogue with the owners of Commonwealth House, the adjacent building, with the aim of delivering the new, but historic route, as a safe and attractive piece of public realm.

13 Since then, it is understood that the applicant and the owners of Commonwealth House have been collaborating to bring forward a holistic design approach for this new route incorporating both spaces on each side of the application boundary. This includes proposals for the service yard of Commonwealth House to function as a public space for part of the day, with unscheduled deliveries controlled by retractable bollards. These plans have been approved by committee as part of the application for the refurbishment of the adjacent site. In addition, the applicant has provided further visualisations in a revised design and access statement indicating the potential treatment of Dunn's passage once fully reopened and a light strategy and access plan for the passage will be secured by planning condition and section 106 agreement respectively. This is welcomed and is a significant planning benefit of the scheme that will help improve permeability through what is currently a large urban block.

14 As set out in paragraphs 34 and 35 below, a significant number of objections were raised during the consultation period to the proposed design of the building having a potentially negative impact on the adjacent Bloomsbury and Covent Garden Conservations Areas and on

nearby listed buildings, including the British Museum and St George's Church. It is important to note that English Heritage raised no objection, stating that the proposals would have *"a positive impact on this redundant building and could go some way towards improving the surrounding public realm and the settings of nearby designated heritage assets."*

15 Since the consultation stage, the design of the upper levels of the proposed building has been revised, namely the refinement of the north-west and south-west corners at roof level. The proposal to extend and build out the upper levels of the building was the issue which caused most concern in the representations received by the Council. The refinements are a result of the stepping back of the communal office terrace to provide amphitheatre style seating; similar to the design of the newly proposed public terrace. This results in a stepping back of the raised terrace element behind the articulated corners when compared to the original proposals. The applicant has provided updated modelled views showing the proposed building with the revised roofline. GLA officers welcome these minor alterations to the roofline and consider that the proposed setbacks better articulate the building corners by allowing more sky to appear between them and the roof terrace. The overall effect provides for a more refined bulk and massing when viewed from around the site and is considered a positive improvement over the original proposal.

16 In GLA officers' opinion the development would provide a building that positively contributes to the existing townscape, when compared to the existing building, through its richer articulation. While the proposed design will increase the overall massing at the upper levels this increase in mass is offset by welcome public realm improvements to be delivered around the site, the reactivation of the building that currently provides little contribution to street and townscape and the provision of a public roof garden where new views over the Bloomsbury Conservation area will be provided.

17 Sections 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 impose statutory duties on decision makers, namely to give special regard and attention to the desirability of preserving and/or enhancing the heritage asset(s) and, if harm is identified, to afford that considerable importance and weight. In the present case, and in accordance with these duties, GLA officers have concluded that the proposal will not harm the setting of the conservation areas or listed buildings in the vicinity of the site. GLA officers note that the Council carried out a detailed assessment of the impact of the proposals on key views and heritage assets, including the British Museum and St George's Church, the findings of which support GLA officers' conclusions.

Inclusive design

18 While officers were generally content with the proposals from an inclusive design perspective at the consultation stage, in accordance with the comments made, the detailed layout of the fully wheelchair accessible units is secured by planning condition as is the commitment to build out all of the residential units to Lifetime Homes standards. This is welcomed.

Sustainable development

19 In response to the requests made at the initial consultation stage, the applicant has provided further information explaining that the increased emissions compared to the new build Part L 2013 baseline are mostly due to the constraints set by the existing building envelope. This is accepted.

20 The applicant was also requested to provide a drawing demonstrating that the proposed route for the site heat network linked both the domestic and non-domestic spaces, with the

exception of the small retail spaces which was previously accepted due to the small and intermittent heat demands associated with such units. However, the applicant has stated that a plan of the network can't be provided at this early design stage but has committed to connecting the domestic and non-domestic elements to the network and that it will be future proofed for a connection to a district heat network should one become available. The provision of a detailed energy strategy, in addition to sustainability plan demonstrating how the development will achieve Code for Sustainable Homes level four and BREEAM 'Very Good' ratings will be secured via the associated section 106 agreement. This is supported and the proposals are now accepted in accordance with London Plan energy policy.

Transport

21 Transport for London (TfL) welcomes that £135,000 has been secured towards the relocation and expansion of the High Holborn Cycle Hire docking station, £15,000 towards providing additional Legible London signage and £20,000 for local bus stop improvements. Due to space constraints the applicant has not provided an additional Blue Badge space and this position is accepted in this instance.

22 The other matters raised at the consultation have been addressed through the draft section 106 heads of terms or planning conditions including the provision of a travel plan, construction logistics plan, delivery and servicing plan and car parking management plans.

23 The applicant has clarified the quantum of existing and proposed chargeable floorspace under the Crossrail SPG. As a result a contribution of £5,218,330 has been secured.

Response to consultation

24 The Council undertook two rounds of public consultation; the first in September 2014 and a second in December 2014 to take account of the revisions made to the scheme in response to the initial consultation. In both rounds the application was publicised by sending letters to adjoining occupiers and by issuing site notices and press notices.

Public consultation response

25 In response to the public consultation, a total of 72 objections (46 in first round and 26 in second round) and three letters of support were received. For the convenience of the Mayor the grounds for objections have been summarised below.

26 The representations objected to the proposals on the following grounds. The proposal does not accord with the planning brief for the site, the Site Allocations document or local planning policy, the reuse of the building is welcomed, however, the details of the proposals cause some concerns. In land use terms, some residents objected to the proposals as it was considered a missed opportunity to provide a high quality development with social and cultural uses and the proposals represent a lack of diversity. Objections were raised to the introduction of office, retail and restaurant space as none of the uses currently exist on site, that the development fails to comply with Council policy to provide new public open space and fails to provide any community space as required by the planning brief, the existing industrial type space has the potential to be used for studio or workshop space for artists and therefore these uses should be included. Overall, it was considered that the proposals were a missed opportunity to provide an interesting and diverse community asset, including a variety of uses that reflected the character of the local community.

27 Another common theme within the content of the objections was that the amount of housing proposed was inadequate, did not meet local policy requirements and that the affordable

product will be unaffordable. In addition, many objections were raised with regards to the location of the housing within the building and that the outlook over High Holborn will subject future residents to significant noise.

28 The most overwhelming objection to the proposals reflected by local residents and organisations was the proposed design and its heritage impact, namely the increase in height, scale and bulk of the building and its potential impact on the Covent Garden and Bloomsbury Conservation Areas and listed buildings in the vicinity, particularly St George's Church, the British Museum and Commonwealth House. Many of the objections considered that the proposals were out of character with the local area, namely the existing Georgian, Victorian and Edwardian buildings. Concerns were also raised with the impact of the extensions on the levels of daylight and sunlight that reach adjacent properties and that a number of adjacent windows fail the relevant tests in guidance, and stated that an unbiased daylight assessment of the open spaces is required. The objections stated that the existing sorting office building is not a suitable precedent for the proposed design due to its lack of architectural merit and that the extension of the upper floors and building out of the upper storeys towards the street frontage creates an overbearing form at street level, creating a canyon effect and the proposal should remain within the existing built envelope. Furthermore, the increase in height at the junction of Museum Street and New Oxford Street was inappropriate and that the proposals will have detrimental impacts on views down Museum Street from the British Museum, views along New Oxford Street, including views of Centrepoint, and views of the steeple of St George's Church from the Museum Street. With regards to the appearance of the proposed building, objections considered the architectural approach was more suited to the City and that it was bland and repetitive.

29 With regards to public realm, concerns were raised that the proposals would affect foot traffic on Great Russell Street as it would block the exit to Museum Street and surrounding areas. Furthermore, representations considered that the proposals represented a unique opportunity to provide a new pedestrian and bicycle link between Covent Garden and Bloomsbury.

30 In addition to the above, many representations also express disappointment that the developers had not prioritised local needs and made more extensive and meaningful changes to the proposals in light of concerns and that they had not been adequately consulted.

31 The representations received in response to the revisions maintained many of the same concerns, particularly those with regards to the increased bulk, height and massing and the low level of housing to be provided. Furthermore, the objections consider that while the addition of a D1 community floorspace for a doctor's surgery, securing provision for small retail units and the addition of a public open space on the roof were welcomed, the overall offer was inadequate when compared to policy requirements and that many of the suggestions put forward in the representations have not been provided for. In addition, concerns were raised that there was no guarantee that local businesses will not be priced out in the future and that this building represented the last chance to offer something back to the community.

32 In addition to the above objections, a local architect submitted an alternative illustrative scheme to support the position of the objectors that further housing could be delivered as part of the mixed-use redevelopment of the site, albeit a less profitable scheme for the developer. This was presented as two options, one comprising 45 units and another comprising 60 units. The Council has assessed the alternative scheme within its committee report and concludes that the alternative rooftop residential scheme would be far less efficient in providing income generating floorspace due to the construction constraints of delivering housing of this typology to a good standard. The applicant had explored a rooftop typology as part of the design development, however, this was found to be unviable. The Council considered that the proposed development would deliver the optimum amount of affordable housing as part of a privately funded and

commercially viable scheme and that there is no better alternative. GLA officers support the Council's assessment.

33 Notwithstanding the above, three letters of support were received during the second round of consultation from London and Regional, the owners of Commonwealth House and Royal Mail that welcomed the reactivation of the vacant building to provide office floorspace and 3,000 jobs to bring life back into the area. The representations also welcomed the inclusion of new homes, the public roof garden and the public realm improvements around the site and to Dunn's Passage and that the provision of new restaurants and a public roof terrace would act as perfect half-way stop between Covent Garden and the British Museum. In addition, Royal Mail confirmed that the Mail Rail station will be protected and remain accessible and welcomed the retention of some of the original sorting office equipment to preserve the heritage of the building.

Responses from other organisations

34 The following organisations issued responses to the consultations which included further objections broadly based on design and heritage grounds and that the proposals contradicted the Council's 2004 Planning Brief for the site:

- **English Heritage:** Although consulted in a non-statutory capacity, English Heritage considered that the proposals would have a positive impact on the redundant sorting office building and that they could go some way towards improving the surrounding public realm and the settings of nearby designated heritage assets.
- **Bloomsbury Conservation Area Advisory Committee:** Objected to the application on the grounds that the existing building is already much bigger and bulkier than the existing context, but that it was originally designed to have regard for its context, hence the shoulder height on the New Oxford Street façade reflecting the height of Commonwealth House, and how the upper storeys step back to minimise the visual impact on local views. The proposed building being larger than the existing would be very harmful to local views within the conservation area and its overall setting, and that the housing offer is meagre and located in the most unattractive part of the site. Furthermore, it was considered that the larger building would have very harmful impacts on numerous listed buildings on Museum Street, on St George's Church by overshadowing the steeple and on the setting of the British Museum. The increased bulk and mass will be overbearing on the surrounding streets and will damage views down Museum Street and New Oxford Street. The site represents an opportunity to create a scheme that genuinely enhances the physical historic environment and contributes to the mix of uses and wellbeing of the local area and this potential should be realised. The development is contrary to the Council's own planning brief and public interest and should be refused. With regards to the second round of consultation, the BCAAC maintained its previous objections and stated that the buildings potential for creative and cultural use afforded by the scale of its interior should be utilised, as shown by the pop-up art show held in December 2014. Furthermore, its harmful impact on Seven Dials Conservation Area was expressed. Further detail on the specific impacts on southern views along Museum Street were provided, notably that the existing building already has a negative impact as a termination point for the view from the British Museum, but that the existing stepping back of the upper levels helps mitigate this harm. However, the proposed increase in bulk and height has the potential to exaggerate all the negative impacts of the existing situation and will have unacceptable impacts on the consistent streetscape. The BCAAC also provide further objections to the buildings impact on the views looking north along Museum Street towards the restored St George's Church, as it is considered that the proposed building will obscure the current views of the tower as the building line will be brought forward and also emphasises the objections raised by the

World Monument Fund made on this point. The objections also consider that the provision of a public open space and doctor's surgery tokenistic and do not outweigh the overall heritage harm of the proposals and that the proposals for the speculative office development is entirely alien to the area.

- **Bloomsbury Association:** While objecting to the proposals, the association acknowledged the positive way the pre-application was undertaken and that attempts to resolve some of their concerns have been in the submitted proposal. However, the issue of height and bulk still remain a major concern. The development is considered bland and would contribute little to the urban potential of the existing building or public realm and does not embrace the synergy of Mail Rail or the direct West End connection to the Postal Museum at Mount Pleasant, or link to the British Museum or the mothballed Museum Underground station. These all offer huge potential for related uses at ground/below ground floors and would attract more footfall than the commercial uses proposed. The proposals also ignores the opportunity to make large scale public realm improvements, including contributing to transforming New Oxford Street to a pedestrian priority/vehicle free zone which would have its own character. Would like to see a detailed business plan for an integrated development, not just a mixed-use, city scale development with large floor plates. The provision of housing is welcomed, but would have preferred a greater quantum with a roof top location away from traffic noise, as is the provision of active ground floor uses; however, there is scepticism over the viability of the proposed retail use. Something akin to Covent Garden Market or Camden Market would be more appropriate and provide a wider conceptual definition of retail space to include cultural, workshop, community, museum and market. The inclusion of a GP surgery is welcome but not sufficient to satisfy the serious shortage in the area. While not adamant about a publicly open space or roof garden there are opportunities in relating street or roof space to commercial space and in extending ground level uses through the building, such as those examples at Centrepoint, Covent Garden piazza, and John Lewis although the high management costs are noted. The building has the potential to be an anchor at the end of Museum Street but question whether the street level uses and public space are sufficient to fulfil this role and a better relationship with the block on West Central is sought. The bulk and massing is too heavy and bulky where it is most visible at the northern corner of Museum Street. The increased height compounds this and extending the building towards the street frontages makes the height seem more prominent. While the revisions to the bulk are considered an improvement, the proposals still represent overdevelopment that severely damages the setting of two conservation areas as well as listed buildings nearby. It does not compliment the local area and is contrary to DP25. To approve this development would not be consistent with the recent refusal of the proposals at Museum Street, West Central Street and New Oxford Street on the grounds of the massing damaging to the neighbouring conservation areas. The Council's planning brief, although dated, is still relevant and the proposal fails to deliver its aims and impacts detrimentally on the strategic skyline, the relationship with the listed British Museum and Centrepoint as well as on local views. The design must therefore be more modest and while the revisions to the corner articulation are an improvement the overall mass and height are unacceptable to the sensitive scale of Museum Street. The overall architectural expression of the building is too well mannered and monotonous and its detail is lost in longer views. The contemporary approach to the buildings envelope is supported, however, more articulation is sought to reflect the urban grain of the conservation areas. The reuse of the industrial heritage internally such as fixtures and fittings is welcomed; if they are threatened with removal then consideration should be given to the building being listed. The synergy between the site and the space on Museum Street has been addressed but not on New Oxford Street where there is greater potential and a more adventurous approach to placemaking is encouraged. The Council was urged to incorporate the proposed junction improvement at Museum Street and New

Oxford Street into the section 106, and if funding permits it should also include the improvements for Museum Street North and Princes Circus. Officers note contributions towards some of these works have been included in the draft heads of terms. The opening up of Dunn's Passage was also welcomed, but it must not be dominated by vehicle servicing.

- **Covent Garden Community Association:** The site is a gateway to two conservation areas and is a highly visible introduction to two of London's most historic and revered neighbourhoods. The building would have an impact on these conservation areas and has responsibility to fit with the context. The building has been used for cultural uses for many years and is wrong to depict it as not contributing to the area and that the development is necessary to bring some life to the street as it has been of value to the artistic community. The proposals would deny any future such uses and deaden a large prominent site. The proposed massing is too heavy and bulky and dominates the street frontages making it appear more prominent. The proposals represent overdevelopment that severely damages the setting of two conservation areas as well as listed buildings nearby. It does not compliment the local area and is contrary to DP25. To approve this development would not be consistent with the recent refusal of the proposals at Museum Street, West Central Street and New Oxford Street on the grounds of the massing damaging the neighbouring conservation areas. The Council's planning brief, although dated, is still relevant and the proposal fail to deliver its aims, and impact detrimentally on the strategic skyline, the relationship with the listed British Museum and Centrepoin as well as on local views. The design must therefore be more modest to better reflect the local character. The proposals overreach across the site leaving minimal space on the pavement for pedestrians on Boris Bikes, which is a health and safety hazard given the heavy footfall on High Holborn and New Oxford Street. An increase in floorspace could be achieved without increasing the height by inserting additional floors in the double/triple height spaces and removing the office atrium. The proposals lack connection to the community which is important given the gateway character of the site and the proximity to the British Museum make it critical that any redevelopment has such a connection. The provision of community space could provide that connection and the inclusion of space for a GP surgery is welcome, although this does not seriously address the actual shortage. Given that 82% will be for office space, it cannot be described as a mixed-use development. The level of housing to be provided is inadequate and does not accord with the requirements of the planning brief and local policy. The affordable housing is in a poor location and will be of a low residential quality. The site is in an area identified as being deficient in public open space and therefore some should be provided and the proposed public roof garden is not considered public open space as required under Camden's Planning design requirements. The proposals do not meet Camden's renewable energy policy for 20% on site provision. The presence of specialist retail units over generic chains is supported, however, the 350 sq.m. designated for small retail units is considered tokenistic and does nothing to address the calls for the retention of gallery and cultural uses. The provision of food and drink uses to support local residents and workers are welcomed but they should reflect the character of the area and not be primarily alcohol based as noted in the planning brief, to prevent antisocial behaviour and crime as recently experienced. Cultural, educational or research uses would be supported, such as links to the British Museum, as stated in the planning brief. The developer has also welcomed this idea but not committed to anything. The landscaping works to Museum Street are welcomed but this is to satisfy the offices and do not make up for the very severe damage to the public realm. The changes to the elevational treatments and the refinements to the roof scape have not addressed the fundamental objections to the overdevelopment of the site and its impact on the adjacent conservations areas, listed buildings and the daylight and sunlight to nearby properties.

- **Tavistock Chambers Residential Association:** Objected on the grounds that the proposed building would be more imposing than the existing due to the building out of the upper floors and it would tower over the neighbouring conservation areas, the British Museum and St George's Church. The modern design would be out of character and would have a negative impact. The new building line would create a canyon effect on adjacent roads and will negatively impacts daylight and sunlight to residential blocks. The planning brief lists views south from Museum Street and the view of Centrepont from Holborn as being of critical importance. The proposal would obscure Centrepont and tower over Commonwealth House from the east and act as a visual full stop discouraging pedestrians to walk through from the British Museum to Covent Garden. The planning brief suggests that new housing is of importance, and that a cultural or tourism use should be incorporated but the proposals do not reflect this. The proposal is for a speculative office block with double height retail and only 21 single aspect flats above a service entrance. This is similar to St Giles where large elements remain empty and a mix of uses should be enforced instead of a short term plan to leverage off Crossrail with a quick sale in mind. There is no public open space. The revisions make no concession on the height and bulk which still tower over heritage sites, blocks light to Museum Street and views to surrounding listed buildings. The proposed surgery with no rental guarantee is grossly inadequate; the provision for small retail units does not compensate the lack of D1 spaces. The proposals represent a lost opportunity to provide a further cultural development such as a live music venue or other attraction to this part of the West End.
- **Camden Civic Society:** Objected to the proposals on the grounds that the existing building is larger and more bulky than those around it and while the proposed building does not increase its overall height, raising the outer corners of the building to the same height as the currently set-back storeys would have a negative effect, greater than the proposal made by the British Museum in the 1990's. The increase in bulk at the extremity of the site would have a considerable visual impact, oppressively looming over neighbouring buildings and streets in particular marring views down Museum Street and along New Oxford Street from High Holborn. The group was aghast that English Heritage has supported the proposal and fear that this represents a failure to fulfil their statutory responsibilities, and were concerned that it shows a "profound blindness" to the character of south Bloomsbury and betrays all those organisations and individuals who battled so hard to save the streets to the north from demolition.
- **Stedham Chambers TRA, Coptic Street:** The upper floors of Stedham Chambers South will look directly into the proposed extension of the development. There would be a loss of daylight and sunlight and outlook, overshadowing and a feeling of being more overlooked and enclosed. These windows do not appear to have been included in the daylight and sunlight report. The overall bulk and massing will be too dominant and overbearing to adjacent properties and the character and built form in the conservation area. The height of the development would impair the existing roofline and throw the proportion of the building into imbalance, leading to loss of visual continuity. Condition or planning obligations cannot address this. There are no community facilities proposed which contravenes the planning brief, and the amount of housing is inadequate.
- **Save Britain's Heritage:** Objected to the proposals stating that they would have substantial harm to the setting of St George's church, most notably the sight lines of the tower and would have detrimental consequences for the Bloomsbury Conservation Area due to the proposed height increase. The current sorting office, whilst not of any particular architectural merit, defers to the spire of St George's by being set back from the corner of Museum Street and New Oxford Street and also setting back its upper floors. The spire is the focal point and retains something of its historical place in Hogarth's Gin Lane. The

proposal seeks to remove both setbacks encroaching on the spire. Such opportunities should be used to enhance the surrounding conservation areas and listed buildings, which this proposal fails to do as a result of the increased height and bulk.

- **World Monuments Fund Britain:** The World Monuments Fund also objected to the proposals due to its impact on St George's Church. The church was included on the World Monuments global watch list for heritage risk in 2002 due to ongoing threats from new development in the area. St George's is an internationally significant Baroque masterpiece often recognised as Hawksmoor's finest church with the most eccentric spire in London. Whilst not opposing redevelopment of sites in the area, the current proposal is insensitive to the heritage assets in the immediate area namely the church and the listed buildings in Museum Street. Increasing the height and bulk to rise above St George's steeple has a negative impact on the buildings in the surround conservation areas. Additionally, the proposed design of the Museum Street elevation is not set back from the site boundary and therefore does not respect the historic views of the church from Museum Street, in particular those from the southern half which reference Hogarth's 1751 engraving of Gin Lane. WMF Britain strongly encouraged the Council to revisit the proposals to ensure that it fully respects the significance of the church and its historic environs and the £9.2 million investment in restoring the church and its spire so that the heritage asset is secured for future generations.
- **South Bloomsbury TRA:** Objected to the proposals reflecting many similar concerns to the other representations. The proposal to build upwards and outwards will overwhelm Museum Street and the small scale urban grain damaging the areas village character, and will create an oppressive feel for the residents and pedestrians by reducing daylight. The additional bulk will also mar the view from east to west blocking out Centrepoint which is now an established landmark and will reduce the streamlined effect of Commonwealth House. The proposed reduction of height and partial opening up of the roofline will not make any significant improvement to the mass of the building which will still be disproportionate and overwhelm neighbouring buildings and views in the conservation area. The proposed uses radically depart from the 2004 planning brief, in which a sizeable proportion of building was planned for housing and D1 community use, which seems appropriate for a building previously owned by the public. The proposed increase in property values would make it morally right that more of the building is given over to housing and community uses. The proposed level of housing and the space provided for a GP surgery is too small to meet the needs of the area and unless the rental values can be controlled this is unlikely to be realised. The offer of 350 sq.m. for small retail units is totally inadequate for the local demand, there is a known need for small affordable workshop gallery space and affordable premises for small businesses. The provision of additional public space is ironic as this comes at the cost of increasing the size of the building and limiting amenity to the people on the streets below. The roof garden will not stretch to the north-west corner where the best views are to be had and the limiting hours are disappointing. This does not compensate overall for the loss of amenity. Surely it must be possible to design a building that is an improvement on the existing without compromising the adjacent historic area.
- **Frank Dobson MP:** The proposals represent gross overdevelopment that is insensitive to the area including St George's church and approaches to the British Museum. The proposal is overwhelmingly devoted to office use and despite the extensions does not include enough housing or other community benefit. The quantum, scale, design and location of the flats is unsatisfactory as the area needs better flats at local rents that can be afforded without depending on housing benefit. Virtually the whole of the existing building was a community use and the current offer is pathetic in comparison.

- **Kier Starmer, Labour Prospective Parliamentary Candidate for Holborn and St Pancras:** Submitted comments that the proposals appear to significantly depart from the 2004 Planning Brief by not including “a very significant quantity of new residential accommodation” and not re-using a large part of the site for D1 community purposes. Most significantly, the proposals appear to be inconsistent with the brief’s concern that a taller building is likely to impact on the strategic skyline and building relationships including Centrepont.
- **Will Blair, Conservative Prospective Parliamentary Candidate for Holborn & St Pancras:** Objected to the increased height and bulk making the building more imposing at street level and suited to the City. It will tower over the conservation areas and badly affect the skyline. The proposed uses are unimaginative with not enough housing which is contrary to the planning brief. The development needs more community value and affordable housing.
- **Natalie Bennett on her own behalf and that of Camden Green Party:** Stated that the proposed amendments, particularly the so called public space on the roof are tokenistic and that the proposals represent overdevelopment that contradicts the planning brief and does not reflect the needs of the local community. The number of dwellings is derisory and nowhere near the 50% floor area required by the planning brief and there is no community provision in a building that was very much a community service. The bulk and massing is inappropriate for an internationally significant historic area and the appearance is not in keeping with the adjacent conservation area.
- **Inmidtown Business Improvement District:** Supported the proposals as they would create interactive frontages which are a positive gain for the area and the office and residential uses would further increase footfall and regenerative benefits to the area. The priorities of the BID would be met by this proposal.

35 In addition to the above a number of late representations were received from the following organisations and were reported to the Council’s planning committee via an addendum report:

- **Rector of St George’s Church:** Objected to the proposals and stated that the revisions made to the scheme are cosmetic and do not respond to the fundamental concerns of height and bulk which will relativise St George’s Church and its remarkable tower. The proposals will not contribute to the area and is a dull, overgrown piece of functionalist concrete which will dominate the local skyline.
- **Seven Dials Trust:** The trust recognised that the developer has engaged with the local community and made some revisions but still considered the scheme as being far too bulky, and its design detracts from the conservation area. Emphasis was given to the importance of the location between Covent Garden and the British Museum and the trust fully supported the objections made by SAVE and the World Monument Fund in relation to the setting of the site within the Conservation Area.
- **20th Century Society:** The proposal would harm the setting of Commonwealth House on New Oxford Street which pre-dates the existing building. The latter was clearly designed to knit into the existing urban fabric in terms of massing and scale and the dislocated roof top feature compliments the important view of Commonwealth House. The proposal will harm the setting of Commonwealth House due to its size and overwhelming mass.
- **New West End Company:** As a Business Improvement District (BID) representing many of the businesses in the wider area the proposals are very much supported for generating the

potential for around 3,000 jobs on a site that has remained vacant for over two decades. With Crossrail coming to Tottenham Court Road in 2018 it would be a shame to let the existing building continue to blight the area, especially at a time that Camden is losing a large amount of commercial space to residential. The design fits well within the context of the area. Welcome the affordable homes, fantastic roof garden and the improvements to the public realm and junctions.

- **British Museum:** The British Museum has been in discussion with the developer about having a presence on New Oxford Street but not committed to anything other than periodic confidential and concept discussions. Whilst it has no formal objection to the proposed redevelopment it remains very much impartial to its delivery. In the event of approval discussions may continue.

36 The objections raised during the consultation process from local residents/occupiers, statutory consultees and local bodies are addressed in detail within the Council's committee report, particularly the reoccurring issues regarding the building design, height and massing, its impact on the conservation areas and designated heritage assets, and the requirements of the planning brief, and do not raise any further material planning issues of strategic importance that have not already been considered by the Mayor at the consultation stage and/or in this report.

Article 7: Direction that the Mayor is to be the local planning authority

37 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage 1, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

38 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to 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. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

39 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government Planning Practice Guidance emphasises that parties usually pay their own expenses arising from an appeal.

40 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the

Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

41 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

42 As set out within this report, the issues raised at the consultation stage regarding affordable housing, urban design, inclusive design, sustainable development and transport have been resolved through further revisions, the provision of further information and details secured by planning condition or section 106 legal agreement and the application is now considered acceptable in strategic planning terms.

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

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 *London Plan*
- Housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Providing for Children and Young People's Play and Informal Recreation SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *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*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG*

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
