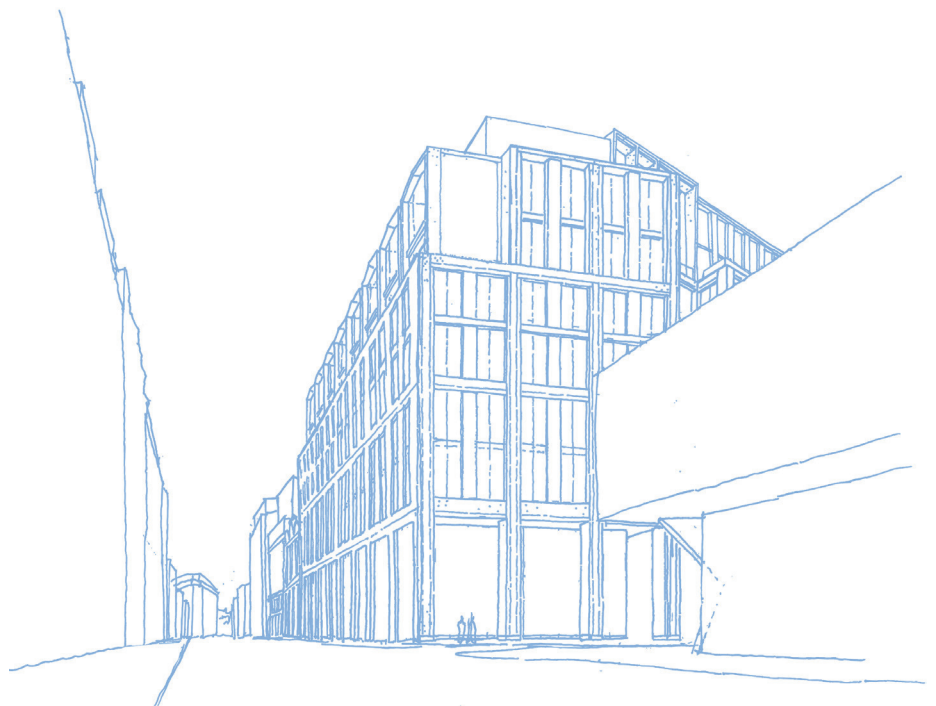


Prepared by Gerald Eve  
On behalf of Royal London Mutual Insurance Society

# Town Planning Statement

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Castlewood House & Medius House, WC1A



January 2017



**GERALDEVE**

Town Planning Statement  
Castlewood House and Medius House, New Oxford Street

On behalf of: Royal London Mutual Insurance Society

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# 1 Executive Summary

- 1.1 The application proposals are brought forward by Royal London Mutual Insurance Society, a wholly-owned and central part of the Royal London Group, the UK's largest mutual life and pensions company.
- 1.2 The proposals represent an exciting and unique opportunity to redevelop a core part of New Oxford Street with Robin Partington & Partners (RPP), an award winning architectural design studio, to provide a mixed use development scheme including 20 affordable homes.
- 1.3 The application site comprises two buildings:
- Castlewood House (77-91), New Oxford Street which is an existing office (Use Class B1) building providing 13,099sqm GEA of commercial floorspace over nine storeys; and
  - Medius House (63-69), New Oxford Street which currently comprises 652sqm GEA of retail (Use Class A1) at ground floor level and 1,610sqm GEA of office (Class B1) floorspace over five upper floors.
- 1.4 Under the application proposals, the existing Castlewood House building will be demolished and replaced with a new mixed use 10 storey building, plus ground floor and two basement levels.
- 1.5 A total of up to 2,304 (GEA) of retail floorspace will be provided across the ground and lower ground levels, of the Castlewood House Site. The ground floor retail units will provide a more active frontage to four sides of the building and will enliven Bucknall Street, which is predominantly used as a service road at present. Up to 18,905 (GEA) of office (B1) floorspace will be provided across the ground and upper floors as well as on the lower ground level. This is proposed to support a wide range of businesses of different sizes. While the footprint of the existing basement level will remain largely unchanged under the application proposals, the lower ground level will be extended to encompass the current courtyard area, on the south west, and existing service yard, on the south east. (Phase 2).
- 1.6 Medius House will also be extended by 2 additional storeys and developed within a retained façade providing up to 20 new affordable homes, which is in excess of

Camden's policy requirement. New communal terraces will be provided for the new residents at level 1 and 8. The existing retail floorspace on the ground floor will be retained providing a total of 525sqm (GEA) of retail floorspace within the refurbished Medius House building (across the ground and basement levels). (Phase 1).

- 1.7 Substantial improvements are also proposed to the public realm within and surrounding the site, which will include a new pedestrian route linking New Oxford Street to Bucknall Street, and a new public place on Earnshaw Street.
- 1.8 The application proposals have evolved around an opportunity to redevelop this site, reflecting Camden's key policy objectives and taking advantage of the Site's many strengths; including its highly accessible Central London location and proximity to the new Crossrail Station at Tottenham Court Road.
- 1.9 The application proposals will result in a highly sustainable mixed use development, including additional office and retail floorspace, providing active frontages at ground floor level. The proposals include the delivery of 20 much needed new affordable homes, which significantly exceeds policy requirements. The proposals also will create new and enhanced pedestrian links through to the surrounding districts.
- 1.10 In this context, it is considered that the development will make a significant contribution to both Camden and to London by improving the dysfunctional lack of permeability between Bloomsbury, Covent Garden, Soho and Holborn, through the creation of a place of character with improved movement and connections between people and places.
- 1.11 The problem of drugs, crime and homelessness in this area is well known. A key success of these proposals will be the ability to significantly reduce these unwanted activities and create a safer, more pleasant area to live and work.
- 1.12 The proposed public realm works and active frontages will improve the street environment, both for those living and those working in the area, by offering more attractive places to spend time, and by making the area more legible, safer and visually attractive whilst providing a high quality and distinctive urban environment.
- 1.13 The proposed development will deliver the following benefits:

- Regenerate and transform the area;
- Provision of modern, flexible Grade A office floorspace;
- Provision of 20 new affordable homes, exceeding policy standards;
- Provision of new and improved active public uses at ground floor level to further activate street frontages with a mix of shops, cafes and restaurants of different sizes;
- Replace the existing Castlewood House building which has no particular architectural or heritage value with a building of exceptional design that enhances the character of the surrounding areas;
- Improve the external design of Medius House to contribute to and enhance the Bloomsbury Conservation Area;
- High quality, attractive design, embracing the principles of sustainable design and construction;
- Improvements to the surrounding public realm;
- Creation of a safe and secure environment for existing and future residents, employees and visitors; and
- A range of planning benefits to be agreed through planning obligations.

1.14 This Planning Statement assesses the scheme in relation to the National Planning Policy Framework (NPPF), London Plan, local planning policy and relevant supplementary guidance.

1.15 For the reasons set out in the Planning Statement, we consider that the application proposals are in accordance with the objectives of planning policy and guidance and will deliver significant design, land use and public benefits.

## 2 Introduction

- 2.1 This Planning Statement is submitted in support of a detailed planning application made on behalf of Royal London Mutual Insurance Society ('the Applicant') for the redevelopment of Castlewood House (77-91), New Oxford Street, to create a new mixed use office and retail building and external alterations, including partial demolition, and extension of Medius House (61 - 69 New Oxford Street), for 20 new affordable homes.
- 2.2 This Statement sets out the town planning case in support of the application. It provides an overview of the site and surroundings and the planning history of the site, and assesses the proposed development in the context of national, regional and local planning policy and guidance.
- 2.3 The 2,360sqm / 0.24 hectare application site is located on the south side of New Oxford Street, to the east of Centre Point and the new Tottenham Court Road Crossrail station (currently under construction). The existing buildings comprise of Castlewood House, an eight storey office building (plus ground and two basement levels), built in the 1950s and bounded by New Oxford Street, Bucknall Street, Earnshaw Street and buildings to the west. Medius House, which is a five storey building (plus ground and one basement level) with retail on the ground floor and office uses on the upper floors. It is bounded by Dyott Street to the east and 71-75 New Oxford Street to the west. The south border is bound by the warehouse on Bucknall Street.
- 2.4 The application proposals are designed by Robin Partington & Partners ("RPP") and are described in Section 5 of this Statement, as well as in the Design and Access Statement.
- 2.5 The application proposals are for the redevelopment of Castlewood House and external alterations, partial demolition, and extension of Medius House. The proposals seek to deliver unique spaces to house and nurture creative, commerce, entrepreneurs, local businesses, retailers and affordable homes. The proposals will contribute to the regeneration of this part of London.
- 2.6 In summary, planning permission is sought for the following:

**Demolition of the existing building, at Castlewood House, and construction of a replacement ten storey mixed use building, plus ground and two basement levels, including the provision of retail (Class A1 and/or A3) and office (Class B1) floor space. External alterations to Medius House including partial demolition, retention of the existing façade and two floor extension to provide up to 20 affordable housing units (Class C3), together with associated highway improvements, public realm, landscaping, vehicular and cycle parking, bin storage and other associated works.**

- 2.7 The planning application has been brought forward following detailed consultations with London Borough of Camden (LBC) and the Greater London Authority (GLA). The application is a strategic application by virtue of its height and is thus referable to the GLA.
- 2.8 Other third parties consulted throughout the design process include Historic England, West End Community Network, Bloomsbury Association, Covent Garden Community Association, Bloomsbury Conservation Area Advisory Committee, the Seven Dials Trust. InMidtown Business Improvement District and local residents and businesses. The application proposals have evolved over the consultation period and have been revised to accommodate comments made during the consultations.
- 2.9 The Statutory Development Plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act (2004), and therefore the development plan, against which development within the LBC must be assessed comprises: the London Plan, being the Spatial Development Strategy for Greater London, adopted by the Mayor in July 2011. Revised Early Minor Alterations were published in October 2013 followed by Further Alterations (FALP) published in March 2015 and Minor Alterations (MALP) published in March 2016, and Camden’s Local Development Framework (LDF). The LDF consists of the Core Strategy (8 November 2010), Development Policies (8 November 2010), Site Allocations Plan (9 September 2013), the Proposals Map (2016), and Camden Planning Guidance.
- 2.10 The Camden Local Plan was submitted, on the 24 June 2016, to the Secretary of State for Communities and Local Government for independent examination. Once adopted will replace the current Core Strategy and Development Policies planning



documents.

2.11 The Statement is structured as follows:

- Section 3 – Description of the site and surroundings;
- Section 4 – Details of the site's background and planning history;
- Section 5 – Details of the development proposals;
- Section 6 – Consultation; and
- Section 7 – Relevant planning policy framework.

2.12 The examination of material planning considerations arising from the application proposals are discussed in the following sections:

- Section 8 – Land Use;
- Section 9 – Design;
- Section 10 – Townscape and Heritage;
- Section 11 – Environment;
- Section 12 – Amenity;
- Section 13 – Transport; and
- Section 14 – Planning Obligations.

2.13 This Statement should be read in conjunction with the plans and drawings submitted, as well as the following documents which are submitted in support of this application (in addition to this Statement):

- Completed planning application form;
- Completed CIL additional information form;
- Application Drawings (including Site Location Plan), prepared by RPP;
- Design and Access Statement (including Access Statement, prepared Arup), prepared by RPP;
- Housing Study, prepared by RPP;
- Planning Statement, prepared by Gerald Eve;
- Affordable Housing Statement, prepared by Gerald Eve;
- Townscape, Heritage and Visual Impact Assessment, prepared by Tavernor Consultancy;
- Air Quality Assessment, prepared by REC;

- Noise Baseline and Constraints Assessment, prepared by REC;
- Historic Environment Assessment, prepared by MOLA;
- Ground Conditions and Contaminated Land Assessment Desk Study, prepared by GB Cards;
- Daylight and Sunlight Assessment, prepared by Point 2 Surveyors;
- Sustainability Statement (including BREEAM, prepared by Verte Sustainability), prepared by GDM Partnership;
- Energy Statement, prepared by GDM Partnership;
- Phase 1 Habitat Survey & BREEAM, prepared by Basecology;
- Preliminary Roost Assessment, prepared by Basecology;
- Arboricultural Impact Assessment Report, prepared by Sharon Hosegood Associates;
- Transport Assessment (including Travel Plan), prepared by Arup;
- Construction Phase Plan Initial Considerations, prepared by Arup;
- Basement Impact Assessment Screening Report, prepared by Davis Maguire;
- Drainage Strategy Report, prepared by Davies Maguire + Whitby;
- Flood Risk Assessment, prepared by CBRE;
- Statement of Community Engagement, prepared by LCA; and
- Financial Viability Report, prepared by Gerald Eve.

2.14 Section 3 of this Statement goes on to consider the application site and its surrounding in more detail.

### 3 Site and Surroundings

- 3.1 The Site is made up of 2 buildings:
- Castlewood House (77-91), New Oxford Street; and
  - Medius House (63-69), New Oxford Street.
- 3.2 Castlewood House is an existing office (Class B1) building providing 13,099sqm GEA of commercial floorspace over nine storeys.
- 3.3 The existing post-war building is predominantly a brown brick facade above a single storey stone plinth. It is solely office use, from lower ground floor (looking out into the sunken courtyards to the rear of the building) to level 08, with the main entrance on New Oxford Street.
- 3.4 63-69 New Oxford Street (known as Medius House) comprises 652sqm GEA of retail (Class A1) at ground floor level and 1,610sqm GEA of office (Class B1) floorspace over five upper floors.
- 3.5 Nos. 63-69 (odd) is a later, interwar building of five storeys, stepping up to six storeys at the junction with Dyott Street. Although of a plainer and heavier architectural style, it shares the rusticated brickwork of its neighbour.
- 3.6 Neither of the properties are listed, though the Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011) identifies Medius House as a 'positive contributor' to the conservation area. In addition, the neighbouring buildings 71-75 New Oxford Street and 12 Dyott Street & 2-4 Bucknall Street are listed as positive contributors.
- 3.7 The London Plan identifies the application Site within the Central Activities Zone (CAZ) and Tottenham Court Road Opportunity Area. The site is not located within any protected views or viewing corridors within the London View Management Framework (2012).
- 3.8 Within the Camden LDF, the Site is within an Archaeological Priority Area, Central London Location and the Tottenham Court Road Growth Area. Medius House is

located within the Bloomsbury Conservation Area whilst Castlewood House sits between the Bloomsbury and the Denmark Street Conservation areas

- 3.9 Bloomsbury Conservation Area was designated in 1968. The special character of the area presents a distinctive rectangular street pattern incorporating open squares and terraced housing in the classical tradition encompassing the whole of the Georgian period. As home to the British Museum, much of the University of London and University College London Hospitals, the Bloomsbury area enjoys a reputation as a centre of cultural and historic importance.
- 3.10 The Site is served by Tottenham Court Road underground station, which has an entrance approximately 200 metres to the west of the site at the junction of Charing Cross Road, Tottenham Court Road and Oxford Street. This is served by the Northern and Central lines. In addition to existing public transport connections, the site will be served by Crossrail, with a new station being constructed at Tottenham Court Road. Holborn underground station is also located approximately 500 metres to the east of the site and served by the Piccadilly and Central lines. Numerous bus routes run along New Oxford Street, Charing Cross Road and Tottenham Court Road.
- 3.11 The Santander Cycle Hire Scheme is also in operation, with the nearest docking station on Earnshaw Street (at the rear of Castlewood House), approximately 50 metres to the south of the junction with New Oxford Street. Given the excellent public transport links, the site is rated at the highest achievable public transport accessibility level (PTAL) of 6b.
- 3.12 Buildings surrounding the site are of a mixed scale and some reach up to 117m, with Centre Point immediately to the west of the site. Central St Giles to the south reaches up to 11 storeys.
- 3.13 Surrounding properties are primarily in commercial (Use Class B1) use with ground floor retail (Use Class A1) and restaurant (Use Class A3) uses. There is some existing residential provision (Use Class C3) as part of Central St. Giles (known as Matilda Apartments), to the south of the site and the Centre Point development, to the west of the site, is currently being converted from commercial to residential use. Larger residential communities are predominantly located to the north in Bloomsbury

or to the south in Covent Garden.

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

## 4 Planning History

- 4.1 This section of the Planning Statement focuses on planning history relating to large scale alterations and land use.
- 4.2 The application proposals relate to two separate buildings, Castlewood House and Medius House, and the planning history is therefore broken down as such.

### **Castlewood House (77 - 91 New Oxford Street)**

- 4.3 There are no significant applications since the permission to erect the office building on the site in the 1940s.
- 4.4 There were three refused applications in 1948 and 1949, with the erection of the office building being permitted in 1949 and subsequent permissions in 1949 and 1950 being granted for variations of the development.
- 4.5 Three planning applications for **“Erection of an office building comprising basement, ground and eight storeys over on the site abutting upon elevational treatment of Nos. 71-91, New Oxford Street, Holborn”** (16 May 1949), **“The erection of an office building upon a site abutting New Oxford Street, Earnshaw Street and Bucknall Street, Holborn”** (08 Oct 1948) and **“Erection of an office building abutting New Oxford Street, Earnshaw Street and Bucknall Street, Holborn”** (03 Jun 1948) were all refused in 1948-1949.
- 4.6 A number of applications were submitted and granted in 1949 and 1950 for: **“The erection of an office building of sub-basement, basement, ground storey and eight storeys over on the site of Nos. 77-91, New Oxford Street, Earnshaw Street and Bucknall Street, Holborn”** (17 Aug 1949), **“Erection of an office building of subbasement, basement, ground storey and eight storeys over, on the site of No. 77/91, New Oxford Street, Earnshaw Street and Bucknall Street, Holborn”** (03 Oct 1949) and **“Erection of an office building on the above site”** (09 Feb 1950).

- 4.7 More recent applications include **“Erection of a fire staircase/lift extension between basement and roof levels at the rear, the erection of duct-work at the rear and plant on the roof in connection with the air conditioning of the building, alterations to the ground floor entrance on New Oxford Street frontage and landscaping work in the sunken car park and garden areas at the rear”** (22 Jul 1983), **“Alterations to existing office building including the installation of new aluminium window frames”** (06 Feb 1984) and **“Erection of a fire staircase/lift extension between basement and roof levels at the rear, the erection of duct work at the rear and plant on the roof in connection with the air conditioning of the building, alterations to the ground floor entrance on New Oxford Street frontage and landscaping work in the sunken car park and garden areas at the rear”** (10 May 1983).

#### **Medius House (63 – 69 New Oxford Street)**

- 4.8 The only historic application for Medius House was for: **“The change of use of the basement and ground floors from restaurant to showroom/retail”** which was granted on 30 March 1979.
- 4.9 There is no significant planning history that has a bearing on the application proposals.

## 5 Development Proposals

- 5.1 This Section of the Planning Statement provides a brief overview of the application proposals. Full descriptions of the proposals are contained within the Design and Access Statement and depicted on the application drawings, prepared by RPP, and submitted with the application. The key details of the proposals are summarised in this Section.
- 5.2 The description of the development is as follows:

**“Demolition of the existing building, at Castlewood House, and construction of a replacement ten storey mixed use building, plus ground and two basement levels, including the provision of retail (Class A1 and/or A3) and office (Class B1) floor space. External alterations to Medius House including partial demolition, retention of the existing façade and two floor extension to provide up to 20 affordable housing units (Class C3), together with associated highway improvements, public realm, landscaping, vehicular and cycle parking, bin storage and other associated works”.**

### Design Evolution

- 5.3 A vision has evolved to create an exciting new development, building on the key policy objectives for this site and taking advantage of the site’s many strengths, namely it’s highly accessible Central London location, unique characteristics, the contribution it can play in enhancing the retail provision along this part of New Oxford Street, and the potential to create new and enhanced pedestrian links through to the surrounding districts.
- 5.4 The application proposals reflect the aspirations of the planning policy and guidance for this site through making the most efficient use of the land and the creation of a highly sustainable mixed-use development, including office, retail and affordable housing, providing active frontages at ground floor and improving the public realm.
- 5.5 The application proposals have evolved in response to feedback received from Officers at LBC and extensive consultation with local groups, stakeholders and residents, as set in further detail in Section 6 of this Statement and within the



Statement of Community Involvement submitted in support of the application.

### Phase Development Proposal

- 5.6 The proposed development at Castlewood House (Phase 2) will provide 23,881sqm (GEA) of mixed-use use floorspace. A new 10 storey (plus ground and two basement levels) building is proposed on the existing site at Castlewood House. The scheme will provide 10 floors of Class B1 office space above ground floor retail. The proposal will utilise the existing basement which will be divided between office use and retail use (at level 1) and support use (at level 2).
- 5.7 Medius House (Phase 1) will consist of the refurbishment and extension of the existing building to create an 8 storey building providing 20 high quality affordable homes with ground floor retail. The existing basement level will be divided between retail and cycle parking and storage facilities for the residential use.

### Land Use Summary

- 5.8 A summary and comparison of the existing and proposed land use components is set out in Table 1 (Castlewood House) and 2 (Medius House) below:-

Land Use	Existing (GEA)	Proposed (GEA)	Net Change (GEA)
Office	13,099sqm	18,905sqm	+5,806sqm
Retail	0sqm	2,304sqm	+2,304sqm
<b>TOTAL</b>	13,099sqm	21,209sqm	+8,110sqm

**Table 1 – Land Use Summary – Castlewood House**

Land Use	Existing (GEA)	Proposed (GEA)	Net Change (GEA)
Office	1,610sqm	0sqm	-1,610sqm
Retail	652sqm	525sqm	-127sqm
Residential	0sqm	2,147sqm	+2,147sqm
<b>TOTAL</b>	2,262sqm	2,672sqm	+410sqm

**Table 2 – Land Use Summary – Medius House**

### Retail Provision

- 5.9 A variety of retail units are provided as part of the proposal, addressing not only New Oxford Street, but also Earnshaw Street, Bucknall Street, and the proposed new pedestrian route. This provision has been designed to be as flexible as possible, allowing for a variety of tenants and unit sizes.

### Office Provision

- 5.10 The proposal provides 18,905sqm (GEA) of office floorspace over 10 floors, at Castlewood House. There are a variety of external terraces, on levels 3, 4, 5, 6 and 8 directly accessible from the office floorplate, and a communally accessible terrace on Level 10. The total amenity space provision amounts to 902sqm.

### Residential Provision

- 5.11 The proposal includes the provision of 20 affordable housing units, at Medius House, as a mixture of Affordable Rented and Intermediate Rented homes, including a wheelchair accessible unit in each tenure.
- 5.12 The breakdown of the residential unit mix and size is set out in Table 3 below:

<b>Residential</b>	<b>Affordable</b>	<b>Intermediate</b>	<b>Total</b>
Studio (1)	1	4	5
1 bed (2)	4	0	4
2 bed (3)	3	3	6
2 bed (4)	1	1	2
3 bed (5)	3	0	3
<b>TOTAL</b>	<b>12</b>	<b>8</b>	<b>20</b>

**Table 3 – Residential Unit Schedule**

- 5.13 All apartments are served by a single core accessed via a shared entrance lobby entered from New Oxford Street.
- 5.14 A communal courtyard at level 1 provides 65sqm of amenity space and 124sqm of communal rooftop terrace. Private amenity space is provided at level 6 (24sqm) and level 7 (23sqm).

### **Basement Arrangement**

- 5.15 The proposal seeks to minimise the amount of excavation required and utilises the existing basement levels and sunken courtyards.
- 5.16 Castlewood House basement level 1 contains space for cyclist and shower facilities for office tenants and 1,131sqm (GIA) of retail accommodation, serviced via the goods lift. Additionally, basement level 1 houses the substation, and a sunken courtyard which is retained as a means of escape for Toni & Guy. Basement level 2 predominantly houses plant rooms.
- 5.17 The proposal retains the existing basement of Medius House, and as with the existing building, the majority is within retail use (mainly utilised for plant and storage), however an area to the west is dedicated to residential use including resident's cycle parking, and waste storage.

### **Public Realm**

- 5.18 The proposal has been developed around the provision of usable public realm (up to 775sqm) on the corner of Earnshaw Street and Bucknall Street.
- 5.19 The scheme also proposes to introduce a new pedestrian route through from Bucknall Street to New Oxford Street.
- 5.20 Further details of the design evolution and a full description of the application proposals are contained in the Design and Access Statement, including details not covered by this Section in respect of:
- Materiality;
  - Façade Treatment;
  - Scale and Massing; and
  - Landscape Proposals.

## 6 Consultation

6.1 Consultation is recognised as an essential tool for balancing the views and needs of different interest groups and securing mutually compatible solutions and as such has played an important role in the evolution of the application proposals and thus the planning application. This Section seeks to outline the consultation strategy for the application proposals.

### **Policy Background**

6.2 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.

6.3 This is reiterated by the National Planning Policy Framework, March 2012, ('NPPF') which states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties.

6.4 Good quality pre-application discussions enable better coordination between public and private resources and improve outcomes for the community (paragraph 188).

6.5 Paragraph 190 reiterates that the more issues that can be resolved at the pre-application stage, the greater the benefits.

### **Consultation Strategy**

6.6 The application proposals for the redevelopment of Castlewood House and external alterations, including partial demolition, and extension of Medius House have been subject to extensive consultation between November 2015 and January 2017 (albeit consultation will continue post submission).

6.7 The consultation strategy have been made up of six distinct phases:

1. Engagement with LBC Officers;
2. Consultation with Residents, Neighbours and Other Stakeholders;
3. Engagement with Ward Councillors;
4. A Members Briefing Presentation;
5. Engagement with Third Parties; and

## 6. Design Review Panel.

### 6.8 Those consulted include:

- LBC Officers:
  - David Glasgow
  - Richard Wilson
  - Ed Jarvis
  - James Hammond
  - Alex Bushell
  - Matthew Dempsey
  - Elizabeth Beaumont-Jones
  - Connie Petrou
  - Frances Wheat
  - Stuart Minty
- The Public
  - Local Residents
  - Local Stakeholders
- Ward Councillors:
  - Cllr Sue Vincent
  - Cllr Awale Olad
  - Cllr Julian Fulbrook
- Development Control Committee Members
  - Cllr Sue Vincent
  - Cllr Heather Johnson
  - Cllr Phil Jones
  - Cllr Danny Beales
- Statutory Consultees:
  - Greater London Authority (GLA)
  - Historic England
  - Transport for London
  - Metropolitan Police Secure by Design officer
- Local Community Groups:
  - The Bloomsbury Association
  - West End Community Network

- Covent Garden Community Association (CGCA)
- The Bloomsbury Conservation Area Advisory Committee (CAAC)
- South Bloomsbury Tenants' and Residents' Association
- The Seven Dials Trust
- InMidtown BID
- New West End Company
- The Soho Society
- Design Review Panel Members
  - Catherine Bird
  - Simon Goode
  - Ian Chalk
  - Sara Grohmann
  - David Lindsey

6.9 The application proposals have evolved over the consultation period and have sought to accommodate, where possible, comments made during these consultations. These comments have included the bulk and design of the proposed buildings, land use, public realm and open space, affordable housing and potential Section106 obligations.

6.10 A summary of the consultation strategy is outlined below. Full details are contained within the Statement of Community Involvement submitted in support of the planning application.

### **Camden Council Officers**

6.11 Extensive pre-application meetings have been held with planning and design officers from LBC since November 2015. Additional highways and affordable housing meetings have also taken place at the pre-application stage with relevant members of LBC.

6.12 In summary meetings have been held on the following dates:

- Planning and Design Meeting on 12 November 2015;
- Planning and Design Meeting on 4 February 2016,
- Planning and Design Meeting on 24 February 2016;

- Planning and Design Meeting on 23 March 2016;
- Planning and Design Meeting on 20 April 2016;
- Affordable Housing Meeting on 21 April 2016;
- Transport and Public Realm Meeting on 23 June 2016;
- Planning and Design Meeting on 18 July 2016;
- Planning and Design Meeting on 21 September 2016;
- Post Design Review Meeting on 5 October 2016;
- Post Design Review Meeting on 5 December 2016
- Planning and Design Review Meeting on 22 December 2016;
- Pre Planning Meeting on 12 January 2017.

6.13 Regular and ongoing engagement with officers at the LBC has influenced the scheme evolution to develop a proposal supportable by officers.

#### **Residents, Neighbours and Other Stakeholders**

6.14 In order for local residents and businesses to understand the application proposals in detail, a public consultation exhibition was held on Wednesday 4 May 2016 (16.00 – 20.00) and Saturday 7 May 2016 (10.00 – 14.00). Before the event, 4,975 invitations were sent out in the surrounding area by letter to advise local residents, occupiers and third parties of the applicant's intention to prepare and submit a planning application for the development of the site. Adverts were placed in the Camden New Journal and West End Extra for two consecutive weeks.

6.15 The public consultation exhibition aimed to demonstrate how the design team has responded to the comments raised during the discussions with officers and stakeholders.

6.16 The exhibition was held at The Congress Centre, 28 Great Russell Street, which is very near to the site. The Applicant and consultant team were present to discuss the application proposals and respond to any questions. In total over 23 responses were received to the proposals.

6.17 A Development Management Forum was held on 9 June 2016, to present the application proposals to local residents, businesses and organisations. 19 members

of the public attended including representatives of various residents groups.

- 6.18 The purpose of the forum was to familiarise local people with the application proposals prior to submission and enable local residents, businesses and organisations to comments on the proposals.
- 6.19 Following the Development Management Forum, a Developer's Briefing was held on Wednesday 27 July 2016. This was attended by members of the project team, in addition to Planning Committee members and Camden Council officers.
- 6.20 Key local stakeholders and amenity groups were offered a meeting ahead of the second public exhibition. A presentation was given to the Covent Garden Community Association (CGCA) on Tuesday August 2016. This was attended by nine local residents.
- 6.21 A second public exhibition was held the at the Congress Centre on Thursday 13 October 2016 (16.00 – 20.00) and St George's Church on Saturday 15 October 2016, and as previously the exhibition was widely publicised. The exhibition focused on detailing the changes made following the first public exhibition, providing CGIs of the scheme, and describing how the construction of the proposed development would be managed.
- 6.22 A third and final public exhibition was held at the Congress Centre on Wednesday 7 December 2016 (14.00 – 20.00). The final exhibition presented the key changes made to the application proposals following feedback from the local community and officers from the London Borough of Camden ahead of a planning application submission.
- 6.23 In addition, throughout the consultation period, a dedicated website (<http://castlewoodhouse.co.uk>) was set up to provide the local community and interested parties with an opportunity to view details of the application proposals and to provide further feedback as necessary.



### **Ward Councillors**

- 6.24 The three Holborn and Covent Garden Ward Councillors were contacted:
- Councillor Sue Vincent
  - Councillor Awale Olad
  - Councillor Julian Fulbrook
- 6.25 A meeting with Ward Councillor Awale Olad was held on Wednesday 4 May 2016. Continued correspondence occurred throughout the consultation period with the Ward Councillors, with the majority of the discussion regarding affordable housing.
- 6.26 Councillor Olad attended the Development Management Forum.

### **Members**

- 6.27 A Members Briefing presentation was also held on 27 July 2016, which gave an opportunity to present the application proposals to committee members.

### **Third Parties**

- 6.28 As part of the pre-application process, the Applicant has met with the following third parties:
- Transport for London;
  - Historic England; and
  - The Greater London Authority (GLA).
- 6.29 Mike Dunn (from Historic England) confirmed that Historic England were content with the redevelopment approach taken and were comfortable for negotiations to continue with Camden without their further input.
- 6.30 The Applicant also met with the GLA on 21 June 2016 to discuss the application proposals. The GLA issued their pre-application letter on 22 August 2016 and confirmed that in principle, they supported the increase in office space, both in terms of quality and quantity, and providing a mixed use development on the site.

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

### **Design Review Panel**

- 6.32 A Design Review Panel (DRP) was held at Camden Council on the 30 September 2016. Key design comments related to the corner design, transition and form of elevations, form and massing, opening spaces and views.
- 6.33 In advance of planning submission a Chair Review Panel was held at Camden Council, on 20 January 2017, in order to present the scheme alterations following comments at the previous panel.
- 6.34 The review panel welcomed the scheme alterations and generally supported the design of both Castlewood House and Medius House. A number of comments were raised for the architectural team to investigate further.

### **Summary**

- 6.35 The consultation strategy has been extensive and has sought to engage with statutory and non-statutory consultees including residents, local businesses, community groups and politicians throughout the design process.
- 6.36 A full and comprehensive consultation has been carried out using many mechanisms to communicate the thoughts and views of the local community and key stakeholder groups directly to the project team and informed the design process.
- 6.37 The application proposals have been revised to reflect comments raised throughout consultation, particularly in relation to the proposed building design, public realm and affordable housing.
- 6.38 The Statement of Community Involvement submitted with this application, includes more in-depth details of the consultation strategy and process undertaken.

## 7 Planning Policy Context

- 7.1 This Section seeks to outline the relevant planning policy and guidance documents against which the application proposals should be assessed against, and the principal planning issues.
- 7.2 The statutory Development Plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:
- The London Plan, being the Spatial Development Strategy for Greater London, adopted by the Mayor in July 2011. Revised Early Minor Alterations were published in October 2013 followed by Further Alterations (FALP) published in March 2015 and Minor Alterations (MALP) published in March 2016.
  - The Camden Local Development Framework (LDF). The LDF is made up of Camden's Core Strategy, Development Policies and Site Allocations Document. These documents set out the Council's intentions for land use and development from 2010 to 2025. The Development Policies provide more detailed policies (from those in the Core Strategy) for assessing planning applications. The LDF documents are up to date and should be afforded full weight.
- 7.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.

### **National Planning Policy Framework**

- 7.4 At a national level, Central Government published the National Planning Policy Framework (NPPF) document (27 March 2012) which supersedes previous national planning policy guidance and planning policy statements.
- 7.5 The NPPF document sets out the Government's planning policies for England and how these are expected to be applied. It summarises in a single document all previous national planning policy advice. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.

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

### **Planning Practice Guidance**

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

### **The London Plan**

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

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

- 7.13 On 11 October 2013, the Mayor published Revised Early Minor Alterations to the London Plan (REMA). From this date, the REMA is formal alterations to the London Plan and form part of the Development Plan for Greater London. Further Alterations to the London Plan (FALP) were published in March 2015 and Minor Alterations to the London Plan (MALP) were published in March 2016. The London Plan therefore now incorporates all of these amendments and is published as The London Plan - The Spatial Development Strategy for London Consolidated with Alterations since 2011 (March 2016).
- 7.14 The Mayor considers that the greatest challenge faced in London is to accommodate significant growth in ways that respect and improve London's diverse heritage while delivering the vision for an exemplary, sustainable world city. This will involve the sensitive intensification of development in locations that are, or will be, well served by public transport.
- 7.15 The application proposals for the site have taken into consideration the most relevant London Plan policies and guidance, including those relating to land use and policies relating to height and bulk, design and sustainability.

### **A City for All Londoners**

- 7.16 A City for all Londoner's (March 2016) is a statement of intent from the London Mayor which sets out a direction of travel for strategies on land use and growth, transport, housing, economic development, the environment, policing and crime, culture and health inequalities.
- 7.17 The Mayor recognises that the City of London, Canary Wharf, the West End and other parts of the Central Activities Zone are the key centres of trade and investment and innovation. Further, in growth locations the Mayor states that land should be used intelligently and intensification of development and specifically in well-connected located well served by existing or planned transport.

## **Local Planning Policy**

- 7.18 At the local level, the LDF consists of the Core Strategy (8 November 2010), Development Policies (8 November 2010), Site Allocations Plan (9 September 2013) and the Proposals Map (2016).
- 7.19 On 24 June 2016 the LBC submitted the Camden Local Plan and supporting documents to the Secretary of State for Communities and Local Government for independent examination. Public hearings took place on 18, 19, 20 and 25 October 2016. The LBC is currently consulting on Main and Minor Modifications until 13 March 2017 which, as relevant, will be considered by the Inspector.
- 7.20 The Local Plan sets out the Council's planning policies and once adopted will replace the current Core Strategy and Development Policies planning documents. The submitted plan has been through various levels of consultation and submitted for examination and as such should be afforded some weight.
- 7.21 The general themes of the emerging Local Plan document are general in conformity with adopted policy and have been duly considered within the scheme design and the preceding sections.

## **Supplementary Planning Guidance**

- 7.22 Other relevant Mayoral and LBC Supplementary and Design Guidance of relevance to this application includes:

### Mayoral SPGs:

- Housing (March 2016);
- Central Activates Zone (March 2016);
- Draft Affordable Housing and Viability (November 2016);

### LBC SPGs:

- Tottenham Court Road Station and St Giles High Street Area Planning Framework (July 2004);
- St Giles to Holborn Place Plan (October 2012);
- Bloomsbury Conservation Area Appraisal and Management Strategy (adopted

April 2011);

- Camden Planning Guidance 1 (CPG1) – Design;
- Camden Planning Guidance 2 (CPG2) – Housing;
- Camden Planning Guidance 3 (CPG3) – Sustainability;
- Camden Planning Guidance 5 (CPG5) – Town centres, retail and employment;
- Camden Planning Guidance 6 (CPG6) – Amenity;
- Camden Planning Guidance 7 (CPG7) – Transport; and
- Camden Planning Guidance 8 (CPG8) – Planning Obligations.

### **Site Specific Designations**

7.23 Within the London Plan, the site is located in the Central Activities Zone (“CAZ”). The London Plan notes that the CAZ contains a unique cluster of vitally important activities including central government offices, headquarters and embassies, the largest concentration of London’s financial and globally-orientated business services sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media. The London Plan identifies that the Mayor and boroughs should inter alia recognise that the CAZ is the heart of London’s world city offer and promote and coordinate development so that together they provide a competitive, integrated and varied global business location.

7.24 The application Site falls within the Tottenham Court Road Opportunity Area as designated by the London Plan, which identifies and promotes the site and surrounding area as being capable of accommodating substantial development to provide new jobs or homes. The London Plan notes that these areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density, both of which apply to the application site.

7.25 On the LDF proposals map, to the Core Strategy, Castlewood House has the following policy designations:

- Archaeological Priority Area London Suburbs
- Central London Area (Clear Zone Region) CLA
- Tottenham Court Road Growth Area

7.26 Medius House is subject to the same designations as Castlewood House, above, but it also part of the Bloomsbury Conservation Area.

7.27 The Council will use its Core Strategy, Development Policies Document, Site Allocations document and Planning Brief, where relevant and up to date, together with the Mayor of London's adopted London Plan as the basis for determining planning applications in the borough. In addition to, more detailed planning guidance, which has been prepared to support these policies, as necessary.

### **Principal Planning Issues**

7.28 As supported by the statutory Development Plan, the Site is considered to represent a major development opportunity within this area of Camden. In this context the application proposals are considered to be consistent with a wide range of policy objectives.

7.29 The key considerations associated with the proposals are examined in the next Sections:

- Section 8: Land Use
  - Context for Development
  - Mixed Use Development
  - Office
  - Retail
  - Residential
  - Affordable housing
    - Unit tenure and mix
    - Unit size
    - Accessibility
    - Density
- Section 9: Design
  - Design rationale
  - Environmental Performance and Sustainability
  - Security and Community Safety



- Section 10: Townscape and Heritage
  - Conservation Areas and Listed Buildings
  - Heritage Assessment
  - Bloomsbury Conservation Area
  - Neighbouring Conservation Areas
  - Nearby Listed Buildings
  - Non Designated Heritage Assets
  - Views
- Section 11: Environment
  - Public Realm/Open space
  - Waste
  - Ecology and Biodiversity
  - Flooding and Drainage;
  - Noise
  - Air Quality
- Section 12: Amenity
  - Residential Amenity
  - Unit Aspect
  - Daylight and Sunlight
  - Overlooking
  - Open Space
- Section 13: Transport
  - Sustainable Transport and Impacts
  - Servicing
  - Accessibility

## 8 Land Use

### Context for Development

- 8.1 The application Site falls within the Tottenham Court Road Opportunity Area as designated by the London Plan, which identifies and promotes the site and surrounding area as being capable of accommodating substantial development to provide new jobs or homes. The London Plan notes that these areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density, both of which apply to the application site.
- 8.2 The London Plan designation has been continued at local level at Core Strategy Policy CS2 with Camden designating the Tottenham Court Road Area as a Growth Area, with an expectation that 360 new homes and around 2,500 jobs will be provided up to 2031. The designation notes that transport enhancements associated with the development of Crossrail will be key to growth and seeks a balanced mix of uses, an excellent public realm, improvements to pedestrian routes, maximised densities and development of the highest quality.
- 8.3 On sites within growth areas, the Council will expect development to:
- Maximise site opportunities;
  - Provide appropriate links to, and benefits for, surrounding areas and communities; and
  - Be in accordance with the Council's aspirations and objectives for the area.
- 8.4 The supporting text of Policy CS2 sets out Camden's aspirations and objectives for the Tottenham Court Road Growth Area. At the time the Core Strategy was adopted (2010) the draft replacement London Plan (2009) expected a minimum of 600 new homes and 5,000 employment capacity in the area between 2006 and 2031. Based on development since 2006, the Council expected around 60% of homes and more than half of the jobs expected in the London Plan to be provided in private sector led schemes in the Tottenham Court Road area.
- 8.5 Emerging Local Plan Policy G1 also seeks to deliver growth by supporting the provision of a mix of uses where appropriate, in particular in the most accessible

parts of the borough, including an element of self-contained housing where possible. Development will be most significant in identified growth areas such as Tottenham Court Road (which includes the site).

### **Mixed Use Development**

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

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

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

8.12 Castlewood House and Medius House are both currently fully occupied. Castlewood House, in its entirety, falls under office use whilst Medius House is a mix of retail and office uses.

8.13 The proposed uplift in gross external floor area is +8,520sqm. Policy DP1 states that up to 50% (4,260sqm) of additional floorspace should be used for housing (Class C3). The application proposals include 2,147sqm of residential floorspace to be provided on-site representing 25.2% of the proposed uplift (all of which is proposed as affordable).

8.14 From the outset, the project team have examined the potential for the maximum quantum of housing to be provided on site in accordance with Policy DP1. Having undertaken a detailed exercise in this regard, it was considered that this amount of residential use cannot practically be delivered on-site having regard to the provisions of Policy DP1 criteria part (b), (d) and (i) set out below. The application proposal is for half of the required residential amount to be provided on site as affordable housing. The Financial Viability Assessment (FVA) concludes that the proposed development cannot viably support the provision of the Payment in Lieu for the private housing element. This exercise and its conclusions are set out in detail in the Housing Study submitted with this application. The conclusions, having regard to the criteria of DP1 are summarised below.

**Criterion b**

- 8.15 Creating a mixed use office building that includes residential would have a significant impact on the active public uses at ground floor level due to the number of cores required through the building.
- 8.16 There would also be a significant impact on the office floorplates which would compromise the office space and value and in certain scenarios render the office space unlettable and therefore not deliverable.
- 8.17 It is proposed to accommodate the affordable housing element of the scheme within the Medius House Phase.

**Criterion d**

- 8.18 A detailed FVA has been prepared to assess the potential to include the target residential floorspace required under Policy DP1. The FVA is submitted as part of the planning application and considers two counterfactual scenarios together with the proposed scheme. The counterfactual scenarios relate to providing a higher proportion of residential accommodation on-site equating to the target residential floorspace required under Policy DP1.
- 8.19 The FVA robustly demonstrates that the only scenario which is potentially capable of being viable is the proposed scheme assuming growth and that this represents the maximum reasonable level of housing. This is supported by rigorous testing through sensitivity, scenario and simulation analysis to examine the inevitable uncertainties associated with development.

**Criterion i**

- 8.20 In terms of the other planning objectives, there is a need for new employment floorspace in Camden. The proposed scheme would create 18,126sq.m (GIA) of new employment space (approximately 5,000sq.m of net additional floor space) generating approximately 15,000 jobs. The development also proposes 2,829 sqm of active public uses within Use Class A1 and/or A3 (approximately 2,000 of net additional floor space), which will also create new jobs. This is in addition to

approximately 2,147sqm of on-site affordable housing.

8.21 Having considered that it was not practical to provide the whole of the residential floorspace requirement on site, a study was carried out to assess the potential of being able to provide it off-site. A search for an appropriate off site solution is ongoing. Over 54 sites have been looked at to date. For each site a number of considerations were taken into account in assessing their suitability including:

- Practical suitability for residential conversion and/or use
- Listing status (where applicable)
- Ability to achieve vacant possession for development
- Third party rights
- Relevant site specific planning policies
- Other site specific issues/constraints

8.22 To date a site has not been identified which, when considered alongside the proposed Castlewood House Phase, would be viable as a donor site for the private housing requirement.

8.23 Emerging Local Plan Policy H2 seeks non-residential development to provide a mix of uses including the maximum appropriate provision of self-contained housing. Specifically, where 1,000sq.m (GIA) of additional floorspace or more is proposed up to 50% of all additional floorspace should be self-contained housing.

8.24 The criteria for determining whether to seek a mix of uses on-site; the most appropriate mix of uses; and the scale and nature of any provision of housing and other uses; has remained largely consisted within emerging policy. The following are considered to be relevant:

- Criterion b – site size, and any constraints on developing the site for a mix of uses;
- Criterion i – the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- Criterion j – whether an alternative approach could better meet the objectives of this policy and the Local Plan.

8.25 The proposed mixed use development is considered to accord with the themes of

the NPPF and London Plan, and more specifically Camden's mixed use policy requirements.

## **Office**

- 8.26 The NPPF sets out the Government's commitment to securing economic growth and advises that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century.
- 8.27 The Ministerial Planning for Growth Statement, March 2011, notes the importance of securing economic growth and employment. The guidance considers that Local Planning Authorities should consider the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession and consider the range of likely economic, environmental and social benefits of proposals; including long term indirect benefits such as increased consumer choice, more viable communities and more robust local economies.
- 8.28 The London Plan notes that the CAZ contains a unique cluster of vitally important activities including central government offices, headquarters and embassies, the largest concentration of London's financial and globally-orientated business services sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media.
- 8.29 London Plan Policy 2.13 relates to Opportunity Areas and Intensification Areas. The site is identified within the Tottenham Court Road Opportunity Area. Policy 2.13 stipulates that development proposals within Opportunity Areas should seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth and where appropriate, contain a mix of uses.
- 8.30 The supporting text of London Plan Policy 4.2 acknowledges that in the CAZ, there remains a strong long-term office demand and a substantial development pipeline which is partly subject to the implementation of Crossrail (para 4.14). Environmental improvements in these locations continue to be needed to enhance its attraction as a global business destination. The London Plan identifies an increase in employment

capacity of 5,000 for the Tottenham Court Road Opportunity Area.

- 8.31 LBC Policy CS8 of the Core Strategy explains that a concentration of office growth should be promoted across growth areas and Central London. Part c) states that LBC will expect a mix of employment facilities and types.
- 8.32 LBC Policy CS9 supports growth in homes, offices, hotels, shops and other uses within Central London. LBC will inter alia:
- Recognise its unique role, character and challenges;
  - Support central London as a focus for Camden's future growth in homes, offices, shops, hotels and other uses;
  - Seek to ensure that development in central London, in the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn and beyond, contributes to London's economic, social and cultural role while meeting the needs of local residents and respecting their quality of life;
  - Support residential communities within central London by protecting amenity and supporting community facilities;
  - Seek to secure additional housing and affordable homes, including as part of appropriate mixed use developments.
- 8.33 LBC development control Policy DP13 states that where sites are suitable for continued business use, LBC will consider redevelopment proposals for mixed use schemes provided that, the level of employment floorspace is maintained or increased; and they include other priority uses, such as housing.
- 8.34 Emerging Local Plan Policy E1 seeks to secure a strong economy in Camden by creating the conditions for economic growth. In particular the LBC will direct new office development to the growth areas (such as Tottenham Court Road) and support proposals for the intensification of employment floorspace.
- 8.35 In addition emerging Local Plan Policy E2 will consider the higher intensity redevelopment of premises or sites that are suitable for continued businesses.
- 8.36 The proposals for the Castlewood House Phase will involve the demolition of the building and redevelopment to provide 18,905sqm (GEA) of flexible Grade A office



space.

- 8.37 The application proposals will create an office building that provides large, flexible floorplates and sufficient ceiling heights to suit the modern office market, which is currently a flaw in the existing building. The floorplates will easily subdivide into small or medium office spaces to suit the requirements of the market, whatever it may be at a point in time. This is in accordance with the aspirations of the London Plan which seeks renovation/renewal of office stock to increase and enhance the quality and flexibility of London's office market.
- 8.38 The proposal therefore accords with the NPPF and London Plan, in addition to adopted and emerging local policy.

### **Retail**

- 8.39 At a national planning policy level, paragraph 23 of the NPPF states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the Plan period.
- 8.40 The guidance makes clear that local planning authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres.
- 8.41 The NPPF requires that Local Planning Authorities should apply a sequential approach when considering the most appropriate location for retail uses i.e. focusing large scale retail in High Order Centres.
- 8.42 Paragraph 23 goes on to state that it is important that needs for retail and other town centre uses are met in full and are not compromised by limited site availability.
- 8.43 At a regional level, the London Plan sets out a number of policies relating to town centres and retail development. Castlewood House and Medius House are located within the CAZ.
- 8.44 Within the CAZ, the London Plan seeks to support and improve the retail offer for resident, workers and visitors especially within the West End as a global shopping

destination (Policy 2.10). In addition, the London Plan acknowledges one of the CAZ's strategic functions is to ensure that development provides for a mix of uses (Policy 2.11).

8.45 London Plan Policy 2.15 sets out the requirements for development proposals within town centres. They should aim to:-

- Sustain and enhance the vitality and viability of the centre
- Accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations
- Support and enhance the competitiveness, quality and diversity of town centre retail, leisure and other consumer services
- Be in scale with the centre
- Promote access by public transport, walking and cycling
- Promote safety, security and 'lifetime neighbourhoods'
- Contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure
- Reduce delivery, servicing and road users' conflict.

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

8.47 In addition, London Plan Policy 4.8 seeks to support a successful and diverse retail sector.

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

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

- 8.50 LBC will promote successful centres for residents, visitors and workers by:
- Seeking to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre;
  - Providing for and maintaining a range of shops, services, food, drink and other suitable uses to provide variety, vibrancy and choice;
  - Protecting and promoting small and independent shops, and resisting the loss of shops where it would cause harm to the character and function of a centre;
  - Making sure that food, drink, and entertainment uses do not have a harmful impact on residents and the local area, and focusing such uses in Camden's Central London Frontages, Town Centres;
  - Supporting and protecting Camden's local shops, markets and areas of specialist shopping;
  - Pursuing the individual planning objectives for each centre.
- 8.51 Paragraph 7.17 of the Core Strategy sets out LBC's vision for small shops. LBC will promote the provision of small units where appropriate and independent shops where possible.
- 8.52 Whilst the proposal is not for large scale retail development the LBC highlights the importance of the provision of small shop units within centres (para 10.4).
- 8.53 Small units are considered to be those that are less than 100sqm gross floorspace. The Council will take in to account the character and size of the shops in the local area when assessing the appropriate scale of new premises.
- 8.54 Emerging Local Plan Policy TC1 focuses new shopping and related uses in Camden's designated growth areas and existing centres, such as the Tottenham Court Road growth area. Para 9.7 states that the Camden Retail and Town Centre Study (2013) indicates a need for around 30,000sqm of new retail floorspace in the borough by 2031.
- 8.55 In terms of design of new retail space, emerging Local Plan Policy TC2 states that retail spaces should be of high quality, provide generous storey heights and

incorporate room for signage.

- 8.56 Emerging Local Plan Policy TC4 seeks to ensure that all development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or amenity neighbours.
- 8.57 Emerging Local Plan Policy TC5 promotes the provision of small shops premises suitable for small and independent businesses.
- 8.58 The development site lies within Central London and therefore should be promoted as part of a competitive town centre which provides customer choice and a diverse retail offer in line with the NPPF, London Plan and LDF aspirations.
- 8.59 Proposals for the site include 2,829sqm (GEA) of retail uses (Class A1 and/or A3), which will enhance this part of New Oxford Street by providing active lower ground floor uses, whilst contributing to CAZ objectives and contributing to an internationally recognised shopping location.
- 8.60 At the present time, the ground floor use at Castlewood House is currently entirely office and there are no active uses. The existing retail space at Medius House, will benefit from improvements offered by the scheme, to improve the whole block and attract a range of retailers to the area. The overall aim of the scheme design is to create 'a sense of place' at the ground floor whilst also ensuring good synergy between the upper commercial and residential uses. The application proposals have the opportunity to activate the frontages at ground floor with a mix and scale of uses that respond to the architecture, location and the local community.
- 8.61 There is reference to potentially expanding the frontages along New Oxford Street in the Camden Planning Guidance and the St Giles to Holborn Place Study makes specific reference to the provision of more active frontages in key development sites. The New Oxford Street frontage is changing with other development in the area and is likely to improve once Crossrail opens.
- 8.62 In light of the challenging retail context, flexibility will be key to allowing a strategy to develop which remains cohesive and responsive to available opportunities and tenant demand but is also sufficiently malleable. Given the strategic role of the CAZ

and the importance of improving and supporting retail growth in the CAZ, we consider that it is important for the application proposals to allow sufficient flexibility to enable the provision for different end users and changing market demands.

- 8.63 To this purpose, it is proposed that there will be a range of flexible A1 and/or A3 retail spaces across the site with the ability to be divided into a range of different unit sizes. A number of different concepts are being considered in order to ensure it becomes a destination and a place people want to visit.
- 8.64 It is considered that the active uses should offer convenience to the local user and tourist and offer a reflection of the very central location between the two major cultural and historical centres of Bloomsbury and Covent Garden. They should be mindful of, but not attempt to compete with the key shopping locations of Oxford Street, Tottenham Court Road, and Covent Garden.
- 8.65 With regards to opening hours, it is anticipated that they would be no later than 12pm for the full restaurant offers. These trading hours would allow the retail provision to be considered favourable alongside other restaurants having similar hours in Covent Garden and Soho.
- 8.66 A strict operational and management policy would be put in place, dealing with such considerations as refuse handling, good deliveries, maintenance and cleaning of any extract duct and use of external seating areas.
- 8.67 The aim is, first and foremost, to create a place where both local residents and Londoners from further afield would want to eat and shop and encourage repeat visits on a regular basis. Appealing to the core market and creating a comfortable social arena will ensure it is appealing to local residents, visitors, be it British Museum visitors or tourists generally, and also the commuters, more particularly when Crossrail becomes established. It should provide a place of choice with a differentiated line up of operators which will be accessible and not elitist. It is considered that this is an exciting opportunity that will optimise the unique volumes within the existing building and activate the frontages in accordance with planning policy and guidance.
- 8.68 It is considered that this is an exciting opportunity that will optimise the unique volumes within the existing building and activate the frontages in accordance with

planning policy and guidance.

## **Residential**

- 8.69 The NPPF states that to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:-
- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
  - identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
  - where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.
- 8.70 Local planning authorities should normally approve planning applications for changes to residential use and any associated development from commercial buildings where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.
- 8.71 The London Plan at Policy 3.3 promotes an annual average target for housing delivery to 42,000 a year across London and sets a minimum annual average target of 8,892 for Camden for 2015 – 2025.
- 8.72 At a local level, Policy CS6 considers that there is a need to provide high quality housing through maximising the supply of additional housing to meet or exceed Camden’s ten year target of 5,950 new homes from 2007-2017 and Camden’s annual target of 595 new homes. Also to meet or exceed a target of 9,925 over the

entire plan period (2010-2025) including 6,550 additional self-contained homes.

- 8.73 Emerging Local Plan Policy H1 seeks to secure a sufficient supply of homes and seeks to maximise the supply of housing. The target for new homes has been increased to 16,800 additional homes from 2015/16-2030/31, including 11,130 additional self-contained homes.
- 8.74 Emerging Local Plan Policy TC2 supports the development of housing within centres and Centre London including above and below shops where this does not prejudice town centre function.
- 8.75 The Council will seek to meet a borough wide affordable housing target of 50% and will seek to create mixed and inclusive communities across Camden.
- 8.76 As set out above, Camden's mixed use policies seek residential accommodation in development where the total gross floorspace increases by >200sqm.
- 8.77 Having undertaken a detailed exercise with regard to the provision of residential on site, it was considered that this amount of residential use cannot practically be delivered on-site following the criteria in Policy DP1, and the optimal solution was for the entire residential element provided to be affordable housing rather than the private element. Therefore, 20 units are provided, equating to 25% against a requirement of 50%.

### **Affordable Housing**

- 8.78 The NPPF, at paragraph 50, states that in order to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:
- Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community;
  - Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
  - Set policies for meeting the need of affordable housing on site.
- 8.79 London Plan Policy 3.10 states that affordable housing (including social rented and

intermediate housing) should be provided to specified eligible households whose needs are not met by the market and should:

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

8.80 London Plan Policy 3.11 states that across London the target is to provide on average 17,000 more affordable homes per year over the plan period. 60% should be for social rent/affordable rent and 40% for intermediate rent or sale.

8.81 London Plan Policy 3.12 states that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes.

8.82 When deciding the maximum reasonable amount of affordable housing, the following should be taken into account:-

- Current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8, 3.10 and 3.11;
- Affordable housing targets adopted in line with Policy 3.11;
- The need to encourage rather than restrain residential development;
- The need to promote mixed and balanced communities (Policy 3.9);
- The size and type of affordable housing needed in particular locations; and
- The specific circumstances of individual sites.

8.83 Policy 3.13 of the London Plan states that affordable housing will be required on sites which have the opportunity to provide 10 or more homes on site applying density guidance set out in Policy 3.4 of the London Plan.

8.84 At a local level, Policy CS6 of Camden's Core Strategy states that the Council will ensure high quality affordable housing by:



- Seeking to ensure that 50% of the borough-wide target for additional self-contained homes is provided as affordable housing;
- Seeking to negotiate a contribution from specific proposals on the basis of:
  - Maximum reasonable amount of affordable housing that could be provided taking into account individual circumstances of the site;
  - A target of 50% affordable housing target of total addition to housing floorspace;
  - Guidelines of 60% social rented housing and 40% intermediate affordable housing;
- Minimising the net loss of affordable housing; and
- Regenerating Camden’s housing estates and seeking to bring Council stock up to the Decent Homes standard by 2012.

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

- Seeking a diverse range of housing products in the market and affordable sectors to provide a range of homes accessible across the spectrum of household incomes;
- Seeking a range of self-contained homes of different sizes to meet the Council’s identified dwelling-size priorities;
- Seeking a variety of housing types suitable for different groups, including families, people with mobility difficulties, older people, homeless people and vulnerable people; and
- Giving priority to development that provides affordable housing for vulnerable people.

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

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

capacity for 50 dwellings.

- 8.88 Emerging Local Plan Policy H4 continues to seek to maximise the supply of affordable housing, and aims for an appropriate mix of affordable housing types. A contribution is expected for all developments that provide one or more additional homes. A sliding scale target is introduced to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes. The guideline mix of affordable housing types of 60% social-affordable rented housing and 40% intermediate housing is retained.
- 8.89 It is proposed to provide more than 100% of the required level of affordable housing on site based on the uplift in total gross floorspace. The application proposals will deliver 20 affordable homes as part of the Medius House Phase in the form of 9 x 1 bed/studio, 8 x 2 bed and 3 x 3 bed.
- 8.90 The proposed level of affordable housing is in accordance with National, Regional and Local Planning Policy (adopted and emerging) as it provides more than 100% of the required level of affordable housing on site as well as the maximum reasonable amount and contributes towards the National and Regional shortage in affordable housing generally.

### **Unit Tenure and Mix**

- 8.91 With regard to unit size the London Plan sets out minimum space standards for new dwellings at table 3.3.
- 8.92 Policy 3.8 in the London Plan states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.
- 8.93 The Mayor's Housing SPG sets out the need for different unit sizes in private, affordable or mixed residential schemes. The SPG only sets out strategic London wide requirements and does not set targets for individual sites. The SPG recognises that housing should be appropriate to context and constraints within a particular site and that the requirement for units of different sizes varies widely between local areas.

8.94 In considering the mix of uses and the appropriate contribution to the housing supply in Camden, the strategic aim of the Council is ensure that a variety and mix of housing is provided in the Borough to suit the widely differing social and economic needs of residents.

8.95 At a local level, Policy DP5 states that the Council will seek to secure a range of self-contained homes of different sizes through ensuring that all residential development contributes to meeting the priorities set out in the Dwelling Size Priorities Table and expect a mix of large and small homes in all residential developments of 5 homes or more.

8.96 Emerging Local Plan Policy H7 seeks to secure a range of homes of different sizes and the Council will take a flexible approach when assessing mix of dwelling sizes proposed in each development having regard to a number of factors such as local need, character of the development, site constraints, and different dwelling size priorities for social-affordable rented, intermediate and market homes.

8.97 The proposal includes the residential unit mix set out in Table 4 below:

	<b>1 Bed</b>	<b>2 Bed</b>	<b>3 bed</b>	<b>Total</b>
<b>Units</b>	9	8	3	20
<b>Percentage</b>	45%	40%	15%	100%

**Table 4 – Residential Unit Mix**

8.98 The proposed development ensures that there is a mix of units, providing 9 x 1 bed, 8 x 2 bed and 3 x 3 bed units in accordance with Camden’s Core Strategy (paragraph 6.39) and Policy DP5 which seeks to encourage a range of unit sizes.

8.99 In terms of tenure, the ratio is in accordance with Policy CS6 and proposes 60% as affordable rent and 40% as intermediate rent as set out in Table 5 below:

<b>Unit Size</b>	<b>Affordable Rent</b>	<b>Intermediate</b>
1 bed/1 person	1	4
1 bed/2 person	4	0
2 bed/3 person	3	3

2 bed/4 person	1	1
3 bed/5 person	3	0
<b>Total</b>	<b>12</b>	<b>8</b>

**Table 5 – Tenure Mix**

8.100 From initial consultation with registered providers (RPs) who develop in LBC a number have expressed interest in the units, although a final operator has not yet been selected. As such, there is broad RP and officer support for the unit layouts, space standards and overall configuration, recognising the favourable aspect of the residential proposal and the opportunity presented by affordable housing in this location.

### **Unit Sizes**

8.101 The London Plan provides minimum space standards for new dwelling at table 3.3. It should be noted that all of the affordable homes provided as part of the proposals meet or exceed the relevant housing standards.

8.102 The range of unit sizes (i.e. maximum and minimum) proposed within the development is contained in Table 6. It should be noted that the internal layouts within apartments shown on the proposed floor plans may be subject to design review.

<b>Type of Unit</b>	<b>Range of Unit Sizes (sqm) GIA</b>
1 bed 1 person	40-49
1 bed 2 person	52
2 bed 3 person	61-88
2 bed 4 person	81-90
3 bed 5 person	90-92

**Table 6 – Range of Typical Unit Sizes**

8.103 The affordable units have been designed in accordance with the London Plan and the GLA's Housing Supplementary Planning Guidance. On the basis of the typical unit sizes above, all of the proposed units exceed the minimum space standards for new dwellings as set out in Table 3.3 of the London Plan.

## **Accessibility**

- 8.104 Policy DP6 contained within LBC's Development Policies considers that all housing developments should meet lifetime homes standards and 10% of new homes developed should either meet wheelchair housing standards or be easily adaptable.
- 8.105 The supporting text (para 6.6) states that the Council will expect 10% of residential units to either meet wheelchair housing standards, or be designed so a future occupier can easily adapt the dwelling. This percentage will be applied to schemes which provide 10 units or more.
- 8.106 The supporting text of paragraph 6.5 of Policy DP6 of the London requires the provision of 10% wheelchair accessible units. Therefore, as part of these proposals we will be providing 2 wheelchair accessible units.
- 8.107 London Plan Policy 3.8, relating to housing choice, states that ninety percent of new housing should meet Building Regulations requirement M4(2) 'accessible and adaptable dwelling' and ten per cent should meet Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.
- 8.108 Emerging Local Plan Policy H6 seeks to secure high quality accessible homes in all developments that include housing and full requirements of Building Regulations M4(2) and M4(2) are sought.
- 8.109 All of the above Regional and local standards are met, further details regarding accessibility are detailed within the accompanying Design and Access Statement.

## **Density**

- 8.110 Policy 3.4 of the London Plan states that development should optimise housing output for different types of location within the relevant density range.
- 8.111 The Site is located in a prime inner London location where an efficient use of land is key. The PTAL for this site is PTAL level 6b where densities of 650-1100 habitable rooms per hectare (hr/ha) are considered appropriate.

- 8.112 The proposed development will provide 41 habitable rooms equating to 1157 hr/ha based on the mixed used density calculation within the GLA Housing SPG. This sits just above the specified range, however the London Plan and the Housing SPG confirm that it is not appropriate to apply Table 3.2 mechanistically as other factors need to be taken into account, including local context, design and transport capacity as well as open space and play space (supporting para 3.28).
- 8.113 In order to meet London's housing requirements residential densities should be optimised in appropriate locations with good public transport access. Consequently the London Plan recognises scope for higher density residential and mixed use development in town centres, opportunity areas and intensification areas such as the site.

## 9 Design

### Design Rationale

- 9.1 The NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (Paragraph 57).
- 9.2 The NPPF identifies that securing high quality and inclusive design goes beyond aesthetic considerations. Therefore planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment (Paragraph 61).
- 9.3 Policies 5.3 and 7.2 of the London Plan seek development to meet the highest standards of sustainable and accessible design and construction, to improve the environmental performance of new development and to adapt to the effects of climate change over their lifetime.
- 9.4 Policy 7.3 advises that design should encourage a level of human activity that is appropriate to the location, to maximise activity throughout the day and night, creating a reduced risk of crime and sense of safety at all time.
- 9.5 Policies 7.4, 7.5 and 7.6 seek to ensure that development respects the local character of the area; promotes high quality public realm; and ensures that the architecture makes a positive contribution to a coherent public realm, streetscape and wider cityscape.
- 9.6 London Plan Policy 7.6 sets out a series of overarching design principles for development in London and advises that large scale buildings should be of the highest quality design, including inter alia:
- Optimise the potential of sites;
  - Promote high quality inclusive design;
  - Incorporate the best practice in resource management and climate change mitigation;
  - Comprise materials and details which complement local architectural character;
- and

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

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

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

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

9.9 Emerging Local Plan Policy D1 continues to ensure a high quality of design in development. The policy also provides a criterion for assessing tall buildings such as how it relates to its surroundings, historic context, relationship between the building and views, degree of overshadowing on public spaces and contribution a building makes to pedestrian permeability and improved public accessibility. However, supporting text (para 7.35) states that for this policy tall buildings are considered to be those which are substantially taller than their neighbours or which significantly change the skyline.

9.10 Camden has also published a Planning Guidance SPD, April 2011 which establishes design principles to be used in the assessment of development proposals. The document reinforces or where necessary amplifies existing guidance and defines the Council's expectations for new buildings, as positive and enduring additions to this unique urban landscape. The key messages are to consider:

- The context of a development and its surrounding area;
- The design of the building itself;



- The use of the building;
- The materials used; and
- Public spaces.

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

9.12 The framework goes on to set out general principles of design that should apply across the area:

- Developments should relate effectively to the existing pattern and sizes of streets and blocks;
- Should be designed to provide for easy movement;
- Must take account of adjoining buildings, general pattern of heights in the area and the main views / vistas / landmarks;
- A high standard of building and landscape materials;
- Careful attention to architectural detailing;
- Incorporation of principles for environmental sustainability.

9.13 A scheme has been designed by the project architects, RPP, that will create a positive impact on this part of London, improving the streetscape of New Oxford Street and contributing to the positive changes that can be seen in the immediate area over the past few years and in years to come.

9.14 The first step for the design team was to assess the context of the site so that the scheme could develop sensitively to the locality. Medius House (which is of some architectural merit) has an existing active frontage along New Oxford Street, with retail at ground floor level, Castlewood House currently presents a blank façade that fails to animate the surrounding streets. In addition to this, Castlewood House has an undesirable silhouette, and currently both detracts from the setting of the neighbouring Grade II listed Centre Point, and fails to address the important corner of New Oxford Street and Earnshaw Street, where it holds a prominent position.

9.15 The impact of Central St Giles and the use of Bucknall Street principally as a service

road were also key considerations, as well as the sunken courtyard to Castlewood House.

- 9.16 The site has a rich and varied history, which has seen the street pattern constantly change. This has more recently been impacted by large scale redevelopment throughout the area's history.
- 9.17 Castlewood house sits between the Bloomsbury and Denmark Street Conservation Area. Medius House is within sub-area 8 of the Bloomsbury Conservation area.
- 9.18 Neither of the properties are listed, albeit there are a number of listed buildings in proximity to the site include Centre Point (Grade II listed). In addition, the Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011) identifies Medius House as a 'positive contributor' to the conservation area. In addition, the neighbouring buildings 71-75 New Oxford Street and 12 Dyott Street & 2-4 Bucknall Street are listed as positive contributors.
- 9.19 There is a huge variety of sizes and styles of buildings locally, with the heights of the neighbouring Centre Point building reaching 117m and acting as a sentinel for the area. Whilst the heights of the proposed buildings have increased, the proposed mass maintains a very similar relationship to the heights of the surrounding context. In addition, the introduction of carefully designed setbacks at upper levels means dominant parapet lines often reflect the existing height.
- 9.20 A detailed Design and Access Statement is submitted with the application, which assesses the application proposals and illustrates how the design has evolved during the life of the project.

### **Environmental Performance / Sustainability**

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

- 9.22 The Mayor's vision in the London Plan is to ensure London becomes an exemplary, sustainable world city whilst allowing London to grow in a responsible and considered socio-economic manner.
- 9.23 London Plan Policy 5.1 seeks to achieve an overall reduction in London carbon dioxide emissions of 60% (below 1990 levels) by 2025.
- 9.24 Policy 5.2 states that proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's energy hierarchy.
- 9.25 Major development proposals should include a detailed energy assessment to demonstrate how the minimum target for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy.
- 9.26 Policy 5.3 states that development proposals should ensure that sustainable design standards are integral to the proposal, including its construction and operation, and ensure they are considered at the beginning of the design process.
- 9.27 Policy 5.6 considers that development proposals should evaluate the feasibility of a Combined Heat and Power system which should seek:
- Connection of existing heating or cooling networks;
  - Site wide CHP network;
  - Communal heating and cooling.
- 9.28 Policy 5.7 seeks to increase the proportion of energy generated from renewable sources, and that the minimum targets for installed renewable energy capacity will be achieved in London. Development proposals should provide a reduction in carbon dioxide emissions through the use of onsite renewable energy generation, where feasible.
- 9.29 All renewable energy systems should be located and designed to minimise any potential adverse impact on biodiversity, the natural environment and historical assets.
- 9.30 Policy 5.10 states that the Mayor will promote and support urban greening such as

new planting in the public realm which includes tree planting, green roofs and walls and soft landscaping.

- 9.31 Policy 5.11 encourages the use of roof, wall and site planting, especially green roofs and walls where feasible, to deliver as many objectives of draft Policy 5.11 as possible.
- 9.32 Camden Core Strategy Policy CS13 advises that the council will require all developments to take measures to minimise the effects of and adapt to climate change.
- 9.33 Development Policies Policy DP22 requires development to incorporate sustainable design and construction measures including providing green and brown roofs; meeting Code for Sustainable Homes level 4 by 2013; expecting developments to meet very good in Eco Homes prior to 2013 and encouraging 'excellence' from 2013; expecting non-domestic development to achieve 'very good' BREEAM assessments and 'excellent' from 2016; and ensuring schemes include appropriate climate change adaptation measures, such as:
- Summer shading and planting;
  - Limiting run-off;
  - Reducing water consumption;
  - Reducing air pollution; and
  - Not locating vulnerable uses in basements in flood-prone areas.
- 9.34 Emerging Local Plan Policy CC1 requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 9.35 Emerging Local Plan Policy CC2 requires development to be resilient to climate change. All developments should adopt appropriate climate change adaptation measures such as
- The protection of existing green spaces and promoting new appropriate green infrastructure,
  - Not increasing, and wherever possible reducing, surface water run-off through

increasing permeable surfaces and use of Sustainable Drainage Systems.

- Incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and
- Measures to reduce the impact of urban and dwelling overheating including application of cooling hierarchy.

9.36 In addition, under emerging Local Plan Policy CC2 the Council will promote sustainable design and construction by:

- Ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into design and proposed implementation;
- Encourage new build residential development to use the Home Quality Mark and Passivhaus design standards;
- Expecting developments of residential dwellings to achieve “excellent” in BREEAM domestic refurbishment; and
- Expecting non-domestic developments to achieve “excellent” in BREEAM assessment and encouraging zero carbon in new development from 2019

9.37 The Tottenham Court Road Station and St Giles High Street Area Planning Framework advises that the design of new development in the area should incorporate principles of environmental sustainability, particularly in respect of ventilations, energy and water use, materials, and flexibility of layout.

9.38 Policies within Chapter 5 of the London Plan set out relevant design and climate change adaptation policies relating to developments, and establishes expectations for applicant’s commitments in terms of CO2 savings and measures proposed.

9.39 As required by the GLA’s guidance after establishing the baseline energy demand and profile for the site, the strategy for the project will follow the Major’s Energy Hierarchy in appraising appropriate measures to reduce carbon emissions and other climate impacts from the development:

### **Be Lean**

9.40 The development incorporates a number of passive measures to improve the overall

energy efficiency of the building. These include:

- Improved fabric insulation,
- High efficiency lighting with daylight control,
- Enhanced external wall U-Value,
- Enhanced solar controlled glazing, and
- Improved heating efficiency.

### **Be Clean**

9.41 Currently there is no existing heat distribution network in the vicinity and as such this technology has not been incorporated. Combined heat and power engines are not viable for a development of this nature and will not be provided. As such, clean measures have not been adopted as part of the application proposals.

### **Be Green**

9.42 Photovoltaic collectors are the viable solution for the proposed development and there is sufficient south facing flat roof area. An array of 79sqm of PV has been incorporated into the design proposal at Castlewood House.

9.43 The total site wide regulated carbon saving through the combination of energy efficient design and renewable technologies is 23.7%. Due to the development not reaching the carbon reduction target of 35% a carbon offset payment will accommodate the additional 11.3%.

9.44 It has been established that the office and retail provision in the Castlewood House Phase has the potential to achieve a rating of BREEAM 'Excellent'. The development proposals for residential provision in the Medius House Phase will currently score a BREEAM Domestic Refurbishment rating of 'Very Good'. The abovementioned ratings are broadly consistent with adopted and emerging standards.

9.45 An Energy Statement and Sustainability Statement have been prepared and submitted in support of this application and provide full details of the schemes compliance with standards relating to environmental performance and sustainability.

## Security and Community Safety

- 9.46 The London Plan recognises that initiatives relating to policing and community safety and crime reduction are important in improving the quality of life of many Londoners. These include sensitive design and lighting, joint action to tackle crime on estates and measures taken through regeneration initiatives.
- 9.47 Policy 7.3 lists a number of design principles for new development including that they are safe for occupants and passers-by taking into account the objectives of ‘Secured by Design’, ‘Designing out Crime’.
- 9.48 The Secured by Design initiative states that good design must be the aim of all those involved in the development process and should be encouraged everywhere. The objective of Secured by Design is to achieve a better quality of life by addressing crime prevention at the earliest opportunity in the design, layout and construction of homes and commercial premises.
- 9.49 The Government published Safer Places: The Planning System & Crime Prevention 2004. This document firmly establishes this subject within the planning process and identifies Secured by Design as a successful model.
- 9.50 At a local level, Core Strategy Policy CS17 advises that the Council will require all developments to incorporate design principles which contribute to community safety and security.
- 9.51 Emerging Local Plan Policy C5 states that the Council will require developments to demonstrate that they have incorporated design principles which contribute to community safety and security; promote safer public areas and pedestrian friendly spaces.
- 9.52 The problem of drugs, crime and homelessness in this area are well known. As such, ‘Secure by Design’ guidance was considered throughout the design process in order to reduce the opportunity for crime by creating a safer, better designed streetscape with increased natural surveillance.
- 9.53 The Applicant has been working with LBC and the Metropolitan Police to develop a

design incorporating 'Secure by Design' principals.

- 9.54 The existing Castlewood House building has inactive frontages, and large, sunken courtyards to the rear. By removing these courtyards, and introducing retail units at ground floor, opportunity for crime will be reduced.
- 9.55 The route through from Bucknall to New Oxford Street also has active frontages along it, and will be secured at night.
- 9.56 The proposed new public space, at the corner of Bucknall and Earnshaw Streets, sits off a public highway, and is therefore highly visible to the public.



## 10 Townscape and Heritage

### Conservation Areas and Listed Buildings

- 10.1 Section 66 of the 1990 Planning Act (Listed Buildings and Conservation Areas), states that decision makers are required to give “considerable importance and weight” to the desirability of preserving listed buildings, conservation areas and their settings.
- 10.2 Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 also provides that, in respect of development affecting conservation areas, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 10.3 The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development.
- 10.4 The NPPF also provides Government guidance on the impact of development on heritage assets which are of historic or architectural merit (Paragraphs 8, 17, 129, 132 of the NPPF).
- 10.5 Paragraph 56 of the NPPF states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 10.6 At paragraph 57, the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
- 10.7 Paragraph 61 identifies that securing high quality and inclusive design goes beyond aesthetic considerations. Therefore planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environments.
- 10.8 Under paragraph 128 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting.

10.9 Paragraph 131 states that in determining planning applications, local planning authorities should take account of;

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

10.10 When considering the impact of the proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a Grade II listed building, park or garden should be exceptional (paragraph 132).

10.11 Paragraph 133 states that, where a proposal would lead to substantial harm to, or the total loss of significance of, a designated heritage asset, planning permission should be refused unless the loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or the building cannot be used or maintained.

10.12 Where a development proposal will lead to a less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 134).

10.13 Paragraph 135 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining an application. In weighing applications that affect non-designated heritage assets directly or indirectly, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

10.14 In addition to the NPPF, further supplementary guidance on conserving and enhancing the historic environment is provided in the Planning Practice Guidance

(PPG). Paragraph 9 states that the ‘significance’ of a heritage asset and the contribution of its settings, is very important to understanding the potential impact and acceptability of proposals.

10.15 With regard to identifying harm to heritage assets, Paragraph 17 of the PPG (‘Conserving and enhancing the historic environment’ chapter) states that whether a proposal causes “substantial harm” is a matter of planning judgement for the decision maker. Substantial harm is considered a “high test”, so may not occur in many cases. It is also noted that it is the degree of harm to the asset’s significance rather than the scale of development itself which falls to be assessed.

10.16 Paragraph 20 of the PPG (‘Conserving and enhancing the historic environment’ chapter) acknowledges that the public benefits which flow from a development can be anything that delivers economic, social or environmental progress, as described in the NPPF. It also acknowledges that public benefits can include heritage benefits such as sustaining or enhancing the significance of a Heritage asset and the contribution of its setting, reducing or removing risks to a heritage asset or securing the optimum viable use of a heritage asset in support of its long term conservation.

10.17 Policy CS14 contained within LBC’s Core Strategy, sets out the requirements to safeguard Camden’s heritage. The overall strategy is to sustainably manage growth in Camden in a way that conserves and enhances the heritage and valued places that give the Borough its unique character.

10.18 Development Policy DP25 indicates that to maintain the character of Camden’s conservation areas, the Council will:

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

10.19 Emerging Local Plan Policy D2 sets out how the Council will preserve, and where appropriate enhance Camden's rich and diverse heritage assets and their settings, including conservations areas, listed buildings, archaeological remains, and locally listed heritage assets.

### **Heritage Assessment**

10.20 The accompanying Townscape, Heritage and Visual Impact Assessment (THVIA), prepared by Tavernor Consultancy, assesses the effect of the application proposals on the character and appearance of the Bloomsbury Conservation Area and other neighbouring conservation areas and on the settings of nearby listed buildings and unlisted buildings of merit, in line with the NPPF and other adopted planning policy and guidance.

### **Bloomsbury Conservation Area**

10.21 The application proposals would preserve and enhance the character and appearance of the conservation area as demonstrated by the views assessed, which include the important local views listed in the Conservation Area Appraisal.

10.22 Although the application proposals would be taller than the existing building, the perception would be of its replacement by a new building of equivalent height, in street-level views, and the shoulder height to New Oxford Street would appropriately balance the scale of Prospect House opposite. A new pedestrian route through Castlewood House, between New Oxford Street and Bucknall Street, linking to the route from Central St Giles, would further encourage pedestrian movement through to Central St Giles and the area surrounding the Church of St Giles-in-the-Fields. An enhanced public space at the junction of Bucknall Street and Earnshaw Street would maintain views to New Oxford Street from Central St Giles and would be well activated by the commercial entrance and retail uses.

10.23 The Proposed Development would preserve or enhance the quality of townscape views from the Bloomsbury Conservation Area and would complement the existing character of the New Oxford Street streetscape. The streetscape of Earnshaw Street would be greatly enhanced by the provision of new public realm and the increased legibility of the existing route through Central St Giles. The quality of the townscape of

Bucknall Street would be enhanced by newly-activated retail frontage and the new pedestrian route through Castlewood House.

### **Neighbouring Conservation Areas**

10.24 The site is adjacent to the Denmark Street Conservation Area and is within 300m of the Hanway Street, Soho and Seven Dials Conservation Areas. The settings of these conservation areas would not be harmed by the proposed development.

### **Nearby Listed Buildings**

10.25 A number of listed buildings are situated in the vicinity of the Site, with the ones most relevant to the Site being:

- i. Church of St Giles (Grade I);
- ii. British Museum (Grade I);
- iii. Congress House (Grade II\*);
- iv. Parnell House (Grade II\*);
- v. Roman Catholic Church of St Patrick (Grade II\*);
- vi. Tottenham Public House (Grade II\*);
- vii. Hazelwood House (Grade II);
- viii. Centre Point (Grade II);
- ix. Burtons Headquarters and Shop (Grade II);
- x. Bloomsbury Baptist Chapel (Grade II);

10.26 The accompanying THVIA has assessed the impact of the proposed development on the settings of these listed buildings.

10.27 The THVIA concludes that the Proposed Development would not harm the setting or significance of any listed buildings in the vicinity of the Site.

10.28 The development has been designed to respect the physical fabric of the area including local listed buildings and conservation areas; future approved development; the appropriateness of the Site for the Proposed Development; and the character of the proposed design.

### **Non-Designated Heritage Assets**

- 10.29 Medius House is not listed and is not considered of sufficient interest to warrant listing, but it is recognised as a positive contributor to the Bloomsbury Conservation Area (Ref1-13). While Medius House has some aesthetic value for its New Oxford Street and Dyott Street elevations it is not of exemplary quality and has negligible historical value.
- 10.30 As part of the Proposed Development, Medius House would be extended to eight stories whilst retaining the building's existing facades to New Oxford Street and Dyott Street. The extended corner tower and stair core would be built in red brick and would follow the materiality and architectural style of the existing building. The extended elements would bookend the new 'dormer roof' which is designed to reflect the area's traditional built forms.
- 10.31 The building's primary proportions would be maintained, keeping the building's close visual relationship with the adjacent 73-75 New Oxford Street, whilst the increased height would allow the building to relate better to Prospect House and Albion House and regain the its prominence at junction of Dyott Street and New Oxford Street.
- 10.32 The loss of building fabric from the Proposed Development, and the reduced integrity of the non-designated building through retention of its facades alone, would not affect those elements of the building's character that contribute to its significance. While the change to the building is not considered to be explicitly beneficial to its significance, it would continue to make a positive contribution to the Bloomsbury Conservation Area, preserving the character and quality of its setting.

### **Views**

- 10.33 The London View Management Framework (LVMF) 2012 provides guidance on the policies in the London Plan for the protection of strategically important views in London, and explains how 26 views designated by the Mayor and listed in the London Plan are to be managed. The site does not fall within any views with the LVMF.
- 10.34 A full analysis of these views and other local and mid distance views has been undertaken as part of the pre-application process and the key views have been tested

and reported within the accompanying THVIA.

- 10.35 The 15 views assessed as part of the THVIA demonstrate that, where visible, the proposed development will enhance the views with an appropriately scaled urban development that positively addresses edges and the corners at the main junctions.
- 10.36 As the visual assessment demonstrates, the Proposed Development would respect and enhance existing important views. The Proposed Development would maintain the perspective of channelled street views looking east and west along New Oxford Street and reinforce the strong built edge on the south side of the road. Its scale and form would respect Centre Point and Nos.73-75 New Oxford Street, maintaining the visibility and visual prominence of the two buildings. Centre Point would remain the dominant visual focus of views towards the listed building from Oxford Street and New Oxford Street.
- 10.37 The Proposed Development would form a barely noticeable element in views from Bedford Square and from the British Museum and would not have a significant effect on the setting of these listed buildings. The visual impact from St Giles-in-the-Fields would be minor and would not have a significant effect on the building's setting and would not reduce its prominence in local views.
- 10.38 The views demonstrate that the scale of the proposed development will relate comfortably to existing buildings. The THVIA concludes that the proposed building would not appear as an over dominant element within the existing streetscape but rather as a different building of equivalent scale.
- 10.39 In conclusion there is no harm to the significance of any designated or non-designated heritage asset and as such the need to balance any harm against the public benefits of the scheme under paragraphs 134 and 135 of the NPPF does not apply. Notwithstanding this, substantial public benefits do flow from the proposals as detailed throughout this Statement.

## 11 Environment

### Public Realm, Open Space and Routes

- 11.1 Policy 7.5 of the London Plan seeks to ensure amongst other objectives, that London's public spaces should be secure, accessible, easy to understand and maintain and incorporate the highest quality landscaping, planting, furniture and surfaces.
- 11.2 At a local level, Policy DP24 seeks to ensure that developments provide high quality landscaping proposals. Supporting paragraph 24.22 advises that new hard and soft landscaping should be of a high quality and should positively respond to its local character.
- 11.3 As a result of Crossrail and the station upgrade works at Tottenham Court Road there is an anticipated rise in pedestrian numbers from 30 million in 2009 to 56 million in 2018. In this context the requirement for improved public realm and pedestrian permeability becomes vital for the success of the surrounding area moving forward.
- 11.4 The site is located in the southern section of the area covered by the West End Project. The West End Project area which was approved by Camden's Cabinet on 21 January 2015 and an investment of £38 million has been secured to improve the area centred around removing the one way system on Gower Street and Tottenham Court Road. The scheme includes the following benefits:
- Provision of six new or improved new parks and green spaces,
  - Improved streets for cycling, including protected cycle lanes on Gower Street,
  - Safe and attractive streets with wider tree-lined pavements,
  - Improved access to public transport.
- 11.5 It is Camden's intention for the project to be delivered by 2018 in time for the opening of Crossrail, when it is estimated that Tottenham Court Road Station will be busier than Heathrow Airport.
- 11.6 The emerging Local Plan states (at para 2.29) that development within the Tottenham Court Road growth area should contribute to, amongst other matters, an excellent public realm and improved network of safe and attractive places and routes for



pedestrians and cyclists, that successfully links to neighbouring areas and reduces the dominance of traffic in the areas, complementing the West End Project transport scheme.

- 11.7 The design rationale for the development has evolved in this context, seeking to address and encourage the predicted increased pedestrian flows through the careful development of new public open space.
- 11.8 The scheme proposes 775sqm of usable public realm on the corner of Earnshaw Street and Bucknall Street, which will be lined with an avenue of trees and landscaping. The proposed building at Castlewood House has been set back from the boundary to allow for the open space.
- 11.9 A new pedestrian route through from Bucknall Street to New Oxford Street is proposed increasing pedestrian flow through and around the site, easing congestion on New Oxford Street, in addition to improving pavement widths to the north and east of the site.
- 11.10 The application proposals provide a much improved pedestrian environment and sufficient public realm which accords with the vision and objections of the growth area as well as adopted and emerging planning policy.

### **Waste**

- 11.11 The Mayor's Municipal Management Strategy, Waste Strategy 2000 requires a reduction in biodegradable waste going to landfill and therefore demands better sustainable waste management practices to be adopted by all.
- 11.12 At a local level, Core Strategy policies CS13 and CS18 aim to reduce the amount of waste produced in the Borough and increase recycling and the re-use of materials to meet the targets of 40% of household waste recycled by 2010, 45% by 2015 and 50% by 2020 and make sure that developments include facilities for the storage and collection of waste and recycling.
- 11.13 Development Policies Policy DP26 advises that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that

does not cause harm to amenity.

- 11.14 Emerging Local Plan Policy CC5 aim to reduce the amount of waste produced in the borough and increases recycling targets to meet the London Plan targets of 50% of by 2020 and aspiring to achieve 60% by 2031. As previously the Council will ensure that developments include facilities for the storage and collection of waste and recycling.
- 11.15 The proposal includes recycling facilities for both residential and commercial waste. At Castlewood House a 75sqm waste room is proposed for the storage of commercial recyclable and food waste. At Medius House a 16sqm waste room is provided at ground floor for the use of residential units.
- 11.16 In respect of the commercial waste facilities, a coordinated facilities management team will be employed to book deliveries, store material; arrange goods transfer and manage waste.
- 11.17 The application proposals are therefore considered to accord with national, regional and local planning policy.

### **Ecology and Biodiversity**

- 11.18 The UK Biodiversity Plan was published in 1994; the Mayor published his Biodiversity Strategy in 2002, the London Biodiversity Partnership published the London Biodiversity Action Plan 2001-2004.
- 11.19 At a local level, Core Strategy Policy CS13 and Development Policies DP22 requires developments to incorporate green or brown roofs and green walls wherever suitable
- 11.20 Emerging Local Plan Policy A3, seek to protect and enhance biodiversity. In particular, the Council will resist the loss or harm to priority habitats and species, require developments to access their ability to realise benefits for biodiversity and secure improvements. Policy A3 will also protect, and seek to secure additional trees and vegetation.
- 11.21 A Phase 1 Habitat Survey & BREEAM Construction report has been prepared in support of the planning application. The survey recommends the following measures

to protect and enhance ecology:

- A brown roof is created for Black Redstarts.
- Invertebrate and bird boxes should be added to the green space surrounds of the respective buildings.
- New areas of grassland should be created.
- New woody vegetation should not be subject to any maintenance during bird breeding season.
- External lighting should be direct so that it does not illuminate areas of planting.

11.22 The proposed ecological measures will therefore enhance the site in line with policies CS13 and DP22.

### **Flooding and Drainage**

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

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

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

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

11.27 Emerging Local Plan Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible.

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

11.29 The site is located within Flood Zone 1 and is therefore considered to be a 'very low' or 'low' risk of flooding from surface water. Given it is within Flood Zone 1,

consideration of flooding from the main rivers or sea is not required for the planning process.

- 11.30 No other sources of flooding are considered to pose a risk to the site.
- 11.31 The site is therefore considered to have a 'low' or 'very low' likelihood of flood from all sources and certainly no higher than typical for most buildings in surrounding parts of central London. Significant flood risk mitigation measures are not considered necessary to be incorporated in redevelopment proposals.
- 11.32 The London Plan requires that developers aim for greenfield runoff rates and utilise SuDS where possible in the management of surface water runoff.
- 11.33 It is proposed that the proposed below ground drainage of the Castlewood House development will discharge into the existing Thames Water combined sewer. Below ground drainage will discharge under gravity with the exception of basement drainage which will likely require pumped, depending upon confirmation of the Thames Water sewer invert levels.
- 11.34 Surface water drainage will be attenuated using SuDS. A minimum storage volume of 76m<sup>3</sup> and 15m<sup>3</sup> will be provided for Castlewood House and Medius House respectively through a combination of roof and below ground storage systems to achieve at least a 50% reduction against existing estimated run off and flow rate.
- 11.35 It is therefore considered that the proposed measures meet the regional and local policies relating to water and flooding.

## **Noise**

- 11.36 Policy 7.15 of the London Plan states that development proposals should seek to reduce noise by:
- Minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals;
  - Separate new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation;

- Promoting new technologies and improved practices to reduce noise at source.

11.37 Policy DP28 of Camden's Development Policies states that the Council will seek to ensure that noise and vibration is controlled and managed and will not grant planning permission for:

- Development likely to generate noise pollution; or
- Development sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided.

11.38 DP28 states that Development that exceeds Camden's Noise and Vibration Thresholds will not be permitted. The Council will only grant permission for plant or machinery if it can be operated without cause harm to amenity and does not exceed our noise thresholds.

11.39 DP28 also states that the Council will seek to minimise the impact on local amenity from the demolition and construction phases of development. Where these phases are likely to cause harm, conditions and planning obligations may be used to minimise the impact.

11.40 Emerging Local Plan Policy A1 seeks to manage the impact of development and protect the quality of life of occupiers and neighbours including noise levels.

11.41 More particularly, emerging Local Plan Policy A4 seeks to ensure that noise and vibration is controlled and managed. Planning permission will not be granted for development likely to generate unacceptable noise and vibration or development sensitive to noise in locations which experience high levels of noise.

11.42 REC Limited have been commissioned to undertake a Noise Constraints Assessment, that accompanies this application. The report details a number of mitigation measures in order to reduce the impacts of road traffic on internal office areas, internal habitable areas and emission levels for the proposed plant. The report concludes that subject to the incorporation of the identified recommendations and mitigation measures, it is considered that in principle noise levels can be suitable controlled across the site.

11.43 In light of the above, the proposed development is considered to comply with the

appropriate Regional and Local policy standards.

### **Air Quality**

- 11.44 Under Policy 7.14 of London Plan, “Improving air quality”, boroughs should implement the Mayor’s Air Quality Strategy and work towards achieving reductions in pollutant emissions.
- 11.45 At a local level, Core Strategy Policy CS11 promotes sustainable and efficient travel and Policy CS16 seeks to improve Camden’s health and wellbeing.
- 11.46 Under Development Policy DP32 the Council, in assessing proposals, will require air quality assessments where development could potentially cause harm to the air quality.
- 11.47 Emerging Local Plan Policy CC4 seeks to ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough. The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality.
- 11.48 The entire borough of Camden has been designated as an air quality management area for nitrogen dioxide and PM10 through the local air quality management regime. The latest progress report from 2013 indicated that concentrations within the AQMA still exceed the long term objectives for NO<sub>2</sub> at all monitoring sites however continue to meet objectives for all of the pollutants we monitor with the exception of No<sub>2</sub>. Camden have produced a Clean Air Action Plan (2016 – 2018) setting out the steps that the Council will take to work towards improving air quality.
- 11.49 Effects on local air quality in the construction phase and operational phase have been assessed. During the construction phase it is considered that the use of good practice control measures would provide suitable mitigation, for a development of this size and nature, in order to reduce potential impacts to an acceptable level.
- 11.50 Due to the excellent public transport links offered and the fact that on-site car parking is limited to disabled bays only, additional traffic movements associated with the

operation of the development are not anticipated to be significant and the effect on local air quality will be negligible.

11.51 An Air Quality Assessment has been prepared in support of the planning application. In summary, the report concludes that air quality concentrations of NO<sub>2</sub> at both Castlewood House and Medius are predicted to be elevated. A number of mitigation measures have been suggested to reduce exposure to these pollutants to residents and occupiers.

11.52 Based on the assessment result, the site is considered suitable for the proposed end use subject to the inclusion of relevant mitigation measures. It is therefore considered that the proposal meets the aspirations of both relevant policy and legislation.

## 12 Amenity

### Residential Amenity

- 12.1 At a local level, Policy DP24 requires all development to be of the highest standard of design including the provision of appropriate amenity space.
- 12.2 Policy DP26 states that when considering applications for new developments and changes of use, the Council will require developments to provide:
- An acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
  - Facilities for the storage of recycling, and disposal of waste;
  - Facilities for bicycle storage;
  - Outdoor amenity for private or communal amenity space, wherever practical.
- 12.3 Emerging Local Plan Policy A1 seeks to manage the impacts of new development and will only grant permission for development that does not cause harm to the amenity.
- 12.4 Further standards relating to amenity are contained within Camden's Planning Guidance 6: Amenity and the GLA's Housing SPG (March 2016).
- 12.5 A dedicated residential refuse storage including storage for recycling is provided at ground floor Medius House. The proposals include 32 cycle spaces for the residential use at Medius House.
- 12.6 Whilst some upper floors benefit from external private amenity space (level 6, 24sqm and level 7, 23sqm), the limitations of working within an existing building footprint, with a retained façade, make it challenging to provide appropriate private amenity space as part of the proposal. However, the proposal has sought to provide shared amenity space where possible. A communal courtyard at level 1 provides 65sqm of amenity space. In addition, 124sqm of amenity space is provided on the rooftop terrace, accessed via the communal core. Further details can be found in the Design and Access Statement.



### **Unit Aspect**

- 12.7 London Plan Policy 3.5 requires design of new housing developments to consider elements that enable the home to become a comfortable place of retreat including factors such as dual aspect.
- 12.8 Given the constraints of the residential being located within the converted existing building that forms part of the site, Medius House, the aspects achieved by the proposed units are limited.
- 12.9 The proposed scheme will achieve 75% of the units as dual aspect units. The remaining 5 units are single aspect and facing north. However, the application proposals are entirely acceptable given the site specific constraints and the overarching benefits of the proposal.

### **Daylight and Sunlight**

- 12.10 At a local level, Development Policies DP26 states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity.
- 12.11 Emerging Local Plan Policy A1 seeks to manage the impact of development and protect the quality of life of occupiers and neighbours including daylight and sunlight.
- 12.12 Supporting text for both adopted and emerging Policy (para 26.3, and para 6.5, respectively) advises that to assess whether acceptable level of daylight and sunlight are available to habitable spaces, the Council will take into account the standards recommended in the British Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011).
- 12.13 The BRE guidelines are not mandatory, though local planning authorities will consider the suitability of a proposed scheme for a site within the context of BRE guidance. Consideration will be given to the urban context within which a scheme is located.
- 12.14 The daylight and sunlight affecting the proposed development and surrounding properties is considered within the Daylight and Sunlight Report submitted alongside this application. This report assesses the impact of the proposal in terms of daylight

and sunlight to surrounding properties using both the Average Daylight Factor (ADF) and the Vertical Sky Component (VSC). The report also assesses daylight and sunlight to the proposed residential accommodation within the scheme.

12.15 The following surroundings properties contain residential accommodation, and due to the proximity of the development site, have been assessed in terms of the effects of the proposed development upon their daylight and sunlight amenity:

- Centre Point House,
- Centre Point, and
- 1-53 Matilda Apartments.

12.16 Overall the scheme has been designed well to minimise any impacts to the surrounding residential properties and is generally compliant with BRE guidance relating to daylight and sunlight amenity.

12.17 The scheme demonstrates good levels of compliance with BRE Guidance in terms of internal daylight amenity, with the majority of rooms meeting and improving upon BRE target values.

### **Overlooking**

12.18 Development Policies DP26 also applies to overlooking. The scheme has been designed to protect the existing residents in the surrounding area from overlooking.

12.19 Emerging Local Plan Policy A1 seeks to manage the impact of development and protect the quality of life of occupiers and neighbours by only granting planning permission for development that does not cause harm to the amenity such as overlooking.

12.20 A minimum distance of 18 metres between windows of habitable rooms of different units that directly face each other. This minimum requirement will be the distance between the two closest points on each building (including balconies). Where this standard cannot be met a number of design measures to reduce the potential for overlooking should be included.

12.21 It is therefore considered that the application proposals are in line with policy given its

dense urban location.

## **Open Space**

- 12.22 At a local level Policy DP31, contained within the Development Policies, states that the quantity and quality of open space, outdoor space and recreational facilities in Camden should be increased and deficiencies and under provision should not be made worse. Policy DP31 states that schemes of 5 or more additional dwellings and 500sqm or more of floorspace will be expected to make an appropriate contribution to meeting the increased demand for public open space. Emerging Local Plan Policy A2 continues to seek to protect, maintain and enhance Camden's open spaces.
- 12.23 Camden's Core Strategy identifies areas with an under-provision of open space as well as areas deficient of open space. The definition of public open space deficiency is set out in Appendix A of CPG6 as an area more than 280 metres walking distance away from a public open space with a multi-function role, that is a space over 0.25ha (2,500sq.m).
- 12.24 Although, the site falls within an area of open space deficiency since the adoption of the Core Strategy in 2010 a considerable amount of new publicly accessible open space is in the process of being delivered in the immediate vicinity of the site, particularly the West End Project, Crossrail over-site, Centre Point and St Giles Circus. As such, in the emerging Local Plan the site is no longer located within an area of open space deficiency and is within the 280 metre buffer.
- 12.25 In addition, whether or not the site is considered to be within an area of open space deficiency, Policy DP31 sets out thresholds for open space provision on-site. The threshold for the provision of public open space on site is 100 dwellings or 30,000sqm of any floorspace. Neither the number of proposed dwellings nor the proposed floor area reaches this threshold.
- 12.26 Therefore Camden's policy position in regard to open space provision on this site can be summarised as encouraging but not insistent upon the provision of publicly accessible open space as part of the development with the main emphasis being on securing improvements to the public realm.
- 12.27 However, the introduction of a new pedestrian route and the proposed streetscape

improvement works to Bucknall Street as well as setting the building line back on New Oxford Street and Earnshaw Street and inclusion of 775sqm of public realm go a significant way to realising these objectives.

## 13 Transport

### Sustainable Transport and Impacts

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

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

- 13.9 Development Policy DP16 seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links.
- 13.10 Development Policy DP17 seeks to promote walking, cycling and public transport use, and as such, development should make suitable provision for pedestrians, cyclists and public transport.
- 13.11 Development Policy DP18 states that development should provide the minimum necessary car parking provision. In the Central London Area the Council will expect development to be car free.
- 13.12 The Council will strongly encourage contributions to car clubs and pool car schemes in place of private parking in new developments across the Borough, and will seek the provision of electric charging points as part of any car parking provision.
- 13.13 Emerging Local Plan transport policies TC1-TC4 seek broadly the same objectives as adopted policy.
- 13.14 The site is extremely well connected in terms of public transport with a PTAL rating of 6b (with 1a being the lowest accessibility and 6b being the highest accessibility). The site is within walking distance of Tottenham Court Road and Holborn underground stations and the new proposed Crossrail station at Tottenham Court Road, and 17 bus routes operate within walking distance of the site.
- 13.15 In terms of provision of cycle parking, the proposal will provide for the following cycle parking spaces:
- 220 space for the office space at Castlewood House,
  - 32 spaces for the residential use at Medius House,
  - 14 for retail employees, and
  - 10 public short stay spaces.
- 13.16 The cycle provision will therefore exceed London Plan requirements. In addition,

ancillary facilities including showers, lockers and changing facilities will be provided.

- 13.17 In accordance with London Plan Policy 6.13 there will be no car parking apart from designated bays for Blue Badge holders. An existing on-street parking space could be converted to an on-street blue badge space for use by a resident of Medius House.
- 13.18 Non-residential elements of a development should provide at least one adequate on or off street car parking bay designated even if no general parking is provided. Although in general there is a reduction in on-street car parking to allow for the public realm improvements, the overall provision would comprise on pay-by phone bay and four resident permit bays.
- 13.19 As a result of the proposed developed mixed use development (residential, office and retail) across the whole site there will be a net increase in trip generation. 473 person trips in the AM peak hour and an increase of 473 person trips in the PM peak hour. The distribution of these trips to the pedestrian, cycle and public transport networks indicated that the proposed development will have a minor impact on the operation of the local transport network.
- 13.20 For this reason, a series of proposed mitigation measures have been outlined within the Transport Assessment submitted as part of this application. These mitigation measures include a Construction and Logistics Management Plan (CMP); a Delivery and Servicing Management Plan (SMP); and a Travel Plan. Public realm improvement works are also proposed.
- 13.21 It should be noted that the introduction of Crossrail at Tottenham Court Road will provide an alternative form of transport, thus increasing the transport capacity of the area.
- 13.22 To assess the overall implications of developments, LBC under Policy DP16, expects the submission of a Transport Assessment where the implications of proposals are significant.
- 13.23 The Transport Assessment demonstrates that the proposed development can be accommodated within the existing traffic and transport infrastructure surrounding the development site. This site is well served by public transport and the expected trip demands can be accommodated on the local transport network. The design proposals will help to enhance the surrounding key pedestrian network. Mitigation

measures will address any adverse impacts on the local transport network as a result of the proposed development.

13.24 Overall the application proposals accord with national, regional and local planning policy.

### **Servicing**

13.25 At a national level, paragraph 35 of the NPPF states that developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies.

13.26 At a local level Policy DP20 deals with servicing and deliveries and states that the Council will expect development that would generate significant movement of goods or materials by road, both during construction and in operation, to be located close to the Transport for London Road Network or other Major Roads, accommodate goods vehicles on site and seek opportunities to minimise disruption for local communities through effective management.

13.27 Emerging Local Plan Policy T4 seeks to minimise the movement of goods and material by road.

13.28 The proposed development is estimated to generate 64 delivery and servicing trips a day. For Castlewood House, an off-street loading area accessible from Bucknall Street would be provided, comprising two loading bays. For Medius House, due to the small number of servicing vehicles expected for this building, and the fact that the current A1 retail unit will be retained, it is proposed that vehicles would service from the street on New Oxford Street or Dyott Street.

13.29 The Transport Assessment concludes that the servicing trips will be readily accommodated. A comprehensive Delivery and Servicing Plan (DSP) will be provided as a condition of the planning permission in order to ensure that operational delivery activity is managed satisfactorily.

13.30 Overall the application proposals accord with national, regional and local planning policy.



## **Accessibility**

13.31 The Access Strategy for this development is based on an inclusive model of accessibility. Impairment are considered as individual and not categorised and as such the design philosophy seeks to achieve an inclusive design that maximises access for all disabled people. This satisfies the General Duty placed upon Camden Council under the Equality Act 2010, compliance with statutory regulations and the London Plan to promote the interests of disabled people as identified in the Corporate Disability Equality Scheme. Emerging Local Plan Policy C6 all seeks to promote fair access for all and the removal of barriers.

### Pedestrian Accessibility

13.32 The proposal incorporates separate access points for each of the uses on the site.

13.33 The main entrance for the residential aspect of the scheme will be located to the east of the site, off New Oxford Street, on ground level.

13.34 The main entrance for Castlewood House will be located to the west of the site, off Earnshaw Street, on ground level.

### Wheelchair Accessibility

13.35 Access into each part of the building is level and appropriate provision for lifts has been provided across the site.

13.36 The London Plan requires that 10% of homes are wheelchair accessible and therefore two units are provided within Medius House (1 x social-affordable unit and 1 x intermediate unit).

13.37 The proposed development is car free, however there is an adequate provision of blue badge on-street car parking spaces, in close proximity, to serve the proposals.

### Visual Accessibility

13.38 Signage will be provided across the site, showing access points, the different choices available for vertical circulation, and the location of facilities and destination points.

13.39 Legible London is a pedestrian wayfinding system that helps people walk around London and ensures that signage is consistent and effective. It has been developed to help both residents and visitors within an area walk to their destination quickly and easily.

## 14 Planning Obligations

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

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

- 14.9 The use of planning obligations is specifically required through Core Strategy Policy CS19 'delivering and monitoring the core strategy' although a whole range of individual development policies may be used to justify an obligation.
- 14.10 Core Strategy Policy CS19 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to; support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and mitigate the impact of development.
- 14.11 The Applicant confirms that they will enter into a Legal Agreement with the Council to secure the reasonable and necessary planning obligations associated with the development in accordance with Regulation 122 of the CIL Regulations, the NPPF and Core Strategy Policy CS19.
- 14.12 The package of s106 contributions involved with this development will include:
- Provision of affordable housing on-site;
  - On-site public realm improvement works;
  - Service Management Plan;
  - Construction Management Plan;
  - Green Travel Plan;
  - Car-free Housing;
  - Sustainability Plan;
  - Energy Plan;
  - Employment and Training; and
  - Local Procurement.
- 14.13 The development will require Mayoral CIL payments in accordance with the Community Infrastructure Levy Regulations 2010 as amended.

## 15 Summary and Conclusions

- 15.1 The Applicant has instructed Robin Partington and Partners to design a scheme at Castlewood House & Medius House, New Oxford Street,
- 15.2 The Tottenham Court Road Opportunity Area identifies and promotes the site and surrounding area as being capable of accommodating substantial development to provide new jobs or homes. The London Plan notes that these areas are generally include major brownfield sites with capacity for new development and places with potential for significant increases in density, both of which apply to this application site.
- 15.3 At a local level, the application proposals are at the heart of the strategic Core Strategy objective. These objectives are met through:
- Creating a sustainable development which adapts to a growing population and reuses an existing building;
  - Providing a range of employment opportunities across a range of employment sectors;
  - Providing a range of open spaces and encouraging walking and cycling, enabling people to lead active healthy lives; and
  - Creating a safe and secure environment and future residents and workers.
- 15.4 In this context, it is considered that the development will make a significant contribution to both Camden and to London by creating a sustainable mix of uses, providing high quality office accommodation, a mix of active uses such as shops and restaurants, and 100% of the affordable housing provision. In addition, the public realm works will create a new and improved destination, which is more legible, safer and visually attractive, created around the new Crossrail station.
- 15.5 The proposal demonstrates that it satisfies and exceeds planning policies at national, regional and local levels.
- 15.6 The application accords with national, regional and local policy objectives to deliver sustainable, mixed use and balanced communities.

## Appendix A – Relevant Planning Policies

### London Plan Policies

- Policy 1.1 Delivering the strategic vision and objectives for London;
- Policy 2.1 London in its global, European and United Kingdom context;
- Policy 2.3 Growth areas and co-ordination corridors;
- Policy 2.9 Inner London;
- Policy 2.10 Central Activities Zone – strategic priorities;
- Policy 2.11 Central Activities Zone – strategic functions;
- Policy 2.13 Opportunity areas and intensification zones;
- Policy 2.15 Town Centres;
- Policy 3.1 Ensuring equal life chances for all;
- Policy 3.2 Improving health and addressing health inequalities;
- Policy 3.3 Increasing housing supply;
- Policy 3.4 Optimising housing potential;
- Policy 3.5 Quality and design of housing developments;
- Policy 3.6 Children and young people’s play and informal recreation facilities;
- Policy 3.8 Housing choice;
- Policy 3.9 Mixed and balanced communities;
- Policy 3.10 Definition of affordable housing;
- Policy 3.11 Affordable housing targets;
- Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes;
- Policy 3.13 Affordable housing thresholds;
- Policy 3.15 Coordination of housing development and investment;
- Policy 4.1 Developing London’s economy;
- Policy 4.2 Offices;
- Policy 4.3 Mixed use development and offices;
- Policy 4.7 Retail and town centre development;
- Policy 4.8 Supporting a successful and diverse retail sector;
- Policy 4.9 Small shops;
- Policy 5.1 Climate change mitigation;
- Policy 5.2 Minimising carbon dioxide emissions;
- Policy 5.3 Sustainable design and construction;
- Policy 5.4 Retrofitting;
- Policy 5.5 Decentralised energy networks;
- Policy 5.6 Decentralised energy in development proposals;
- Policy 5.7 Renewable energy;
- Policy 5.8 Innovative energy technologies;
- Policy 5.12 Flood risk management;
- Policy 6.1 Strategic approach;
- Policy 6.3 Assessing effects of development on transport capacity;
- Policy 6.9 Cycling;

- Policy 6.10 Walking;
- Policy 6.13 Parking;
- Policy 7.1 Building London's neighbourhoods and communities;
- Policy 7.2 An inclusive environment;
- Policy 7.3 Designing out crime;
- Policy 7.4 Local character;
- Policy 7.5 Public realm;
- Public 7.6 Architecture;
- Policy 7.7 Location and design of tall and large buildings;
- Policy 8.1 Implementation;
- Policy 8.2 Planning obligations;
- Policy 8.3 Community infrastructure levy.

### **Camden Core Strategy**

- CS1 Distribution of growth;
- CS2 Growth areas;
- CS5 Managing the impact of growth and development;
- CS6 Providing quality homes;
- CS7 Promoting Camden's centres and shops;
- CS8 Promoting a successful and inclusive Camden economy;
- CS9 Achieving a successful Central London;
- CS10 Supporting community facilities and services;
- CS11 Promoting sustainable and efficient travel;
- CS13 Tackling climate change through promoting higher environmental standards;
- CS16 Improving Camden's health and well-being;
- CS17 Making Camden a safer place;
- CS18 Dealing with our waste and encouraging recycling.

### **Camden Development Policies**

- DP1 Mixed use development;
- DP2 Making full use of Camden's capacity for housing;
- DP3 Contributions to the supply of affordable housing;
- DP5 Homes of different sizes;
- DP6 Lifetime homes and wheelchair homes;
- DP10 Helping and promoting small and independent shops;
- DP12 Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses;
- DP13 Employment sites and premises;
- DP15 Community and leisure uses;
- DP16 The transport implications of development;
- DP17 Walking, cycling and public transport;
- DP18 Parking standards and limiting the availability of car parking;
- DP22 Promoting sustainable design and construction;

- DP24 Securing high quality design;
- DP26 Managing the impact of development on occupiers and neighbours;
- DP28 Noise and vibration;
- DP29 Improving access;
- DP30 Shopfronts;
- DP31 Provision of, and improvements to, open space, sport and recreation;
- DP32 Air quality and Camden's Clear Zone.

### **Supplementary Planning Policies**

- Housing (March 2016);
- Central Activates Zone (March 2016);
- Draft Affordable Housing and Viability (November 2016);
- Tottenham Court Road Station and St Giles High Street Area Planning Framework (adopted 2004);
- St Giles to Holborn Place Plan adopted October 2012;
- Camden Planning Guidance 1 (CPG1) – Design;
- Camden Planning Guidance 2 (CPG2) – Housing;
- Camden Planning Guidance 3 (CPG3) – Sustainability;
- Camden Planning Guidance 5 (CPG5) – Town centres, retail and employment;
- Camden Planning Guidance 6 (CPG6) – Amenity;
- Camden Planning Guidance 7 (CPG7) – Transport; and
- Camden Planning Guidance 8 (CPG8) – Planning Obligations.

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- Policy G1 Delivery and location of growth;
- Policy H1 Maximising housing supply;
- Policy H2 Maximising the supply of self-contained housing from mixed-use schemes
- Policy H4 Maximising the supply of affordable housing
- Policy H6 Housing choice and mix;
- Policy H7 Large and small homes;
- Policy C5 Safety and security;
- Policy C6 Access for all;
- Policy E1 Economic development;
- Policy E2 Employment premises and sites;
- Policy A1 Managing the impact of development;
- Policy A2 Open space;
- Policy A3 Biodiversity;
- Policy A4 Noise and vibration;
- Policy A5 Basements;
- Policy D1 Design;
- Policy D2 Heritage;
- Policy CC1 Climate change mitigation;
- Policy CC2 Adapting to climate change;



- Policy CC3 Water and flooding;
- Policy CC4 Air quality;
- Policy CC5 Waste;
- Policy TC1 Quantity and location of retail development;
- Policy TC2 Camden's centres and other shopping areas;
- Policy TC4 Town centre uses;
- Policy T1 Prioritising walking, cycling and public transport;
- Policy T2 Parking and car-free development;
- Policy T3 Transport infrastructure;
- Policy T4 Sustainable movement of goods and materials;