

52 Tottenham Street, Fitzrovia

W1T 4RN

Local Planning Authority: Camden

local planning authority reference: 2020/3043/P

Strategic planning application stage 1 referral

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

The proposal

Comprehensive redevelopment of the site, including the demolition of the existing building and the erection of an 11 storey building providing a mixed use development comprising ground floor affordable workspace (Class B1), four residential units (Class C3) on the upper floors, alongside lower ground floor plant, cycle parking and refuse storage.

The applicant

The applicant is **Flower Island (UK) Ltd** and the architect is **DSDHA**.

Strategic issues summary

Principle of development: The principle of the comprehensive redevelopment of the site in the Central Activities Zone (CAZ) with a mixed-use development that retains employment floor space on-site and enhances the quality and mix of residential units is supported in principle (paragraphs 16 to 19).

Housing: The scale of the development means it is not required to provide on-site affordable housing. However, a contribution towards off-site affordable housing should be secured in the s106 agreement if required by the Council. The enhancement of the quality and mix of housing within a predominately residential neighbourhood of the CAZ is supported (paragraphs 20 to 22).

Urban Design, Heritage and Views: Strategically, the overall height, mass and scale of the scheme is supported as it will not impact upon the character of the Conservation Area or impede on strategically important landmark views. Additional information regarding the Fire Safety Statement must be provided prior to determination. (paragraphs 23 to 39).

Transport: The development's impact on public transport is expected to be minimal and a contribution towards public transport service enhancement is not required. The quantum of cycle storage is acceptable, however a cargo and/or adapted cycle stand within the site should be provided. A Travel Plan should be secured. (Paragraph 40 to 45).

Sustainability: Further information on energy, urban greening and the circular economy is required (paragraph 46 to 48).

Recommendation

That Camden Council be advised that although the proposal is supported in principle, the application does not fully comply with the London Plan and Publication London Plan for the reasons set out in paragraph 52. Where the associated concerns within this report are addressed, the application may comply with the London Plan and Publication London Plan and become acceptable in strategic planning terms.

Context

1. On 11 November 2020, the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following category of the Schedule to the Order 2008:
 - Category 1C: "*Development which comprises or includes the erection of a building of ...more than 30 metres high and is outside the City of London.*"
3. Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the City Hall website: www.london.gov.uk

Site description

5. The site is located on the northern side of Tottenham Street in Fitzrovia within the ward of Bloomsbury in the London Borough of Camden. This part of the borough is an established residential area intermixed with central London activities, including commercial, university and health uses. The site currently comprises a five storey building with commercial/retail at ground and lower ground (basement) level and three residential floors above. The building contains four residential units, one at the rear of the ground floor and three on the upper levels.
6. The site is within the Central Activity Zone (CAZ) and also falls within an area covered by the Fitzrovia Area Action Plan (FAAP) (March 2014), however it is not included as an opportunity site in the AAP. The site is not located within a designated shopping frontage or town centre.
7. The site is within a densely populated area of grid patterned streets containing buildings with a mix of commercial and residential uses consistent with those on the site. Buildings range in scale from four storey terrace buildings to the south with more modern larger scale buildings to the east and west. Both adjoining buildings are substantially large in terms of footprint and height. The building to the west is six storeys and the building to the east, known as Arthur Stanley House is eight storeys in height. Various development consents have been granted on nearby sites, including the adjoining Arthur Stanley House which has been granted consent for the refurbishment and extension of the existing building to be used for health care, employment and residential uses. Another, more recent nearby approval was for the redevelopment of the Middlesex Hospital Annex to the north (2017/0414/P) for the refurbishment, extension and redevelopment of

the site to provide 50 residential units and flexible employment floorspace. The prevailing building height in the area is between eight and 10 storeys.

8. The building on site is recognised as a building of local heritage significance and is located within the Charlotte Street Conservation Area (CA) which has over 70 listed buildings. Overall, buildings in the CA are Georgian in style with some C19th and C20th century infills.
9. The site has a PTAL of 6b. Goodge Street Underground station is a 3 minute walk from the site and several other central London Underground stations are within a 5-15 minute walk of the site. National rail connections at Euston, Kings Cross, St Pancras Marylebone and Paddington are all within a 15-25 minute walk and the surrounding area benefits from several bus connections all within a five minute walk.

Details of this proposal

10. Planning approval is sought for the comprehensive redevelopment of the site, including the demolition of the existing building and the erection of an 11 storey building providing a mixed use development comprising 21.3 sqm of ground floor affordable workspace (Class B1), four residential units (Class C3) on the upper floors (3 duplexes over floors 1 to 6 and a quadruplex above) (3 x 1 Bed Units and 1 x 3 Bed Unit), alongside lower ground floor plant, cycle parking and refuse storage.

Case history

11. The site has been subject to a number of historical applications, including three (all refused) applications in the 1970s to replace the building. Approval was granted in 2008 to allow for a change of use of the upper levels from office to residential together with the erection of a mansard roof extension. More recently, the applicant has had four pre-application meetings regarding the current proposal with the LPA between 2018 and 2019. No pre-application discussions have been held with GLA officers.

Strategic planning issues and relevant policies and guidance

12. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Camden Local Plan 2017 and the London Plan 2016 (consolidated with alterations since 2011).
13. The Report of the Examination in Public of the draft London Plan was published in October 2019, and the Intend to Publish London Plan version (December 2019) was subsequently submitted to the Secretary of State. On 13 March and 10 December 2020 the Secretary of State issued the Mayor with directions under Section 337 of the Greater London Authority Act 1999.
14. On 21 December 2020 the Mayor submitted to the Secretary of State his Publication London Plan with amendments designed to address these directions. This is the most up to date version of the Mayor's London Plan and should be

taken into account as a material consideration on the basis described in the NPPF.

15. On 29 January 2021, the Secretary of State confirmed that he had no further matters to raise and that the Publication London Plan (December 2020) conformed with the previous Directions and could now be published. The Mayor will now move to publish his London Plan.

16. The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- The Mayor's Affordable Housing and Viability SPG (August 2017).
- The Fitzrovia Area Action Plan (March 2014)
- Good Growth *London Plan; Publication London Plan;*
- Housing *London Plan; Publication London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG;*
- Urban design *London Plan; Publication London Plan; Character and Context SPG; Housing SPG;*
- Heritage *London Plan; Publication London Plan;*
- Inclusive access *London Plan; Publication London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Publication London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
- Transport and Parking *London Plan; Publication London Plan; the Mayor's Transport Strategy.*

Principle of development

17. The applicant proposes the replacement of a four-storey building in lawful residential (Use Class C3) and retail use (Use Class A1) with an eleven-storey building for residential (Use Class C3) and office use (Use Class B1). The site is located within a predominantly residential area of the Central Activity Zone (CAZ) and also an area covered by the Fitzrovia Area Action Plan (March 2014) (FAAP). Policy SD4 of the Publication Plan on the Central Activities Zone promotes the nationally and internationally significant office functions of the CAZ, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values. The policy also states that in the CAZ the quality and character of predominantly residential neighbourhoods where more local uses predominate should be conserved and enhanced. The FAAP promotes both new business developments and residential uses in Fitzrovia.

18. In terms of employment floor space, both Policy 4.2 of the London Plan and Policy E1 of the Publication London Plan encourage mixed use developments that improve the quality and diversity of employment and office floor space, including the desire for lower cost and affordable workspace. Policy E2 of the Camden Local Plan also encourages the provision of employment premises within the

borough. The applicant has offered to deliver affordable workspace in order to offset the acute need in Camden for accessible workspace for start-ups, and small to medium sized enterprises. This is welcomed in line with Publication London Plan Policy E3 should be secured in the s106 agreement. The reprovision of the employment floor space, and in particular the provision of affordable workspace in the CAZ accords with relevant policies and is strongly supported.

19. In terms of housing, the proposed development includes the replacement of four single bedroom units with three one bed units and one three bedroom unit. The quantum of units remains unchanged, however the size of units will be substantially increased and a family sized unit will be created. The proposed housing provision enhances the mix of units on site which accords with Policy 3.8 of the London Plan and Policy H10 of the Publication London Plan.

20. Overall, officers consider the principle of development to be acceptable as the proposed land uses comply with relevant policies in terms of appropriate land uses and the proposal will enhance the quality of employment floor space and residential accommodation on the site and will also preserve and enhance the quality and character of this residential precinct of the CAZ. The mixed-use scheme is therefore strongly supported.

Housing

Unit Mix and Internal Amenity

21. With regards to housing, the proposed development will not alter the quantum of residential units on site. The proposal will replace the existing four single bedroom units with three one-bed units and one three-bedroom unit. Each unit will exceed the minimum floor standards and includes good sized external amenity spaces located off living rooms. The scheme will result in a good quality of accommodation for future residents. In terms of mix, the addition of a family sized unit within this central London location will contribute positively to housing choice.

Affordable Housing

22. In terms of Affordable Housing, London Plan and Publication London Plan Policy Affordable Housing policies are only applicable to major developments consisting of 10 or more residential units. Policy H4 of Camden Local Plan on affordable housing expects a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. The development in this instance proposes the replacement four dwellings and an uplift of floorspace in excess of 100sqm

23. Given the oversized nature of the units, GLA officers have investigated if the scheme would be capable of delivering affordable housing on site, if smaller, yet compliant units were proposed. This investigation established that the overall residential floor area of the scheme is approximately 355sqm and therefore is not sufficient to provide at least ten units that would meet minimum space standards. As such, even if the units were reduced in size to increase overall numbers, there is insufficient floor area to ensure those units would be of a suitable quality and mix. Notwithstanding the above, based on Camden's policy and Payment-In-Lieu

formula, the proposed development would derive an affordable housing liability of £64,159. If required by the Council, this contribution towards off-site affordable housing should be secured in the s106 agreement.

Communal Areas and Children's Play space

24. London Plan Policy 3.6 and Policy S4 of the Mayor's Publication London Plan seek to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sqm. per child. No communal areas have been proposed, however given the size of the development and restrictive nature of the site this is considered reasonable for the high density urban environment. With regards to child play space, no specific play area has been provided. However, each flat has in excess of 10 sqm of private amenity space with the only family sized unit having access to a number of external terraces suitable for child's play space. . Overall, the quality, type and location of external amenity space is acceptable.

Urban design

25. London Plan Policies 7.1 and 7.4 and the Publication London Plan Policies D1 and D2 seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhance the historic environment. London Plan Policy 3.4 and Publication London Plan Policy D3 also seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services.

Height, scale and Massing

26. In terms of height and scale, Policy 7.7 of the London Plan and Policy D9 of the Publication London Plan state that tall buildings should be part of a plan-led and design-led approach, incorporating the highest standard of architecture and materials and should contribute to improving the legibility and permeability of an area, with active ground floor uses provided to ensure such buildings form an appropriate relationship with the surrounding public realm. Tall buildings should not have an unacceptably harmful impact on their surroundings in terms of their visual, functional, environmental and cumulative impacts, including wind, overshadowing, glare, strategic and local views and heritage assets. Tall buildings should only be proposed in areas designated as suitable for tall buildings by the borough's development plans.

27. This inner London site is located within an area covered by the FAAP where there are a mix of buildings heights and architectural styles. Lower height Georgian buildings of four storeys are interspersed with taller commercial buildings. With respect to new buildings, the FAAP states that new developments should respond positively to the prevailing form of nearby buildings and reflect the area's human scale. The facade of the proposed building will rise to a similar height of both its neighbours with the overall height being only slightly taller. Whilst the site is not considered an opportunity site within the FAAP and therefore is not specifically identified as suitable for the tallest buildings, in the context of the wider area the

proposed building is not considered to be significantly above prevailing heights and is therefore not considered 'tall' with respect to adopted policy. Strategically, the height of the building is not considered to cause any concern with regards to visual impact upon its surroundings.

Architectural quality

28. The proposal is for a tall slim building to replace a standalone Georgian terrace that is wedged between two taller commercial buildings. The design approach is to create a contemporary building that responds to the prevailing architecture in the area. The façade of the building rises to a similar height of its neighbours, however the upper four storeys are stepped back from the front building line in order to maintain a consistent building height when viewed from the surrounding streets. A limited material palette is proposed, which includes dark bronze metal louvres to the front façade from ground to level six and then dark bronze coloured metal cladding to the façade of the upper four levels and the rear elevation. The objective of the design is to create an elegant building that is articulated through form rather than a variety of materials. In terms of design, GLA officers raise not strategic issues and are of the opinion that the approach is a novel way of optimising site capacity and that the stepped profile at upper levels ensures they will not be visible from street level views. The proposed materials and scale have been appropriately considered and respect the character of the conservation area.

Fire safety

29. No Fire Safety Statement has been provided. To ensure that the scheme accords with Policy D5 of the Mayor's Publication London Plan, a Fire Safety Statement must be provided prior to Stage 2.

Inclusive access

30. London Plan Policy 7.2 and Policy D3 of the Mayor's Publication London Plan seek to ensure that proposals achieve the highest standards of accessible and inclusive design. Any application should ensure that the development can be entered and used safely, easily and with dignity by all; is convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; is designed to incorporate safe and dignified emergency evacuation for all building users; and as a minimum at least one lift per core should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building. Policy 3.8 of the London Plan and Policy D5 of the Mayor's Publication London Plan requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. It is noted that a lift has been proposed, however due to the duplex nature of the units, the Council should ensure that these requirements are achievable and secure them by condition.

Heritage

31. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' and in relation to conservation areas, special attention must be paid to 'the desirability of preserving or enhancing the character or appearance of that area'.
32. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and, 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. Specifically, the NPPF states that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. London Plan Policy 7.8 and Publication London Plan Policy HC1 state that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.
33. In terms of heritage, the site is located within the Charlotte Street Conservation Area (CSCA). The building on the site is not listed or locally listed and there are no listed buildings immediately adjacent to the site. As the site is located in the CSCA, which contains a number of listed buildings, a Heritage Impact Statement has been submitted as part of the application documents.
34. In terms of impact upon the CSCA, the Council have identified the existing building as a positive contributor to the character and appearance of the conservation area. In contrast, the submitted heritage assessment states that the building makes only a neutral contribution to the CSCA as it is a single remnant of a terrace, the facade was rebuilt after WWII resulting in the brickwork and window proportions being altered from the original. Further, the repair and extensions undertaken are clearly visible resulting in there being many better examples of historic terraces, particularly on the southern side of Tottenham Street.
35. The building's contribution to the CSCA was the focus of the initial pre-application discussions with Council. It is understood that these discussions resulted in Council accepting that the demolition of the existing building could be supported subject to a high-quality replacement building and the provision of sufficient public benefits to outweigh any harm that would be identified.
36. Since the initial pre-applications held with Council, the architects were replaced resulting in positive evolution of the scheme in terms of appearance and form. The proposed building is well proportioned which will enhance the street frontage

thereby improving the local townscape and the significance Charlotte Street Conservation Area. With respect to impact upon the CSCA, the heritage assessment concludes that the proposal would cause no harm to the significance of the CSCA. GLA officers agree that the proposed building is of a high architectural quality and share the view of the heritage consultant that if built in place of the existing building it would not harm the character of the CSCA. Furthermore, the building would result in public benefits such as improved employment floor space and providing high quality residential accommodation.

37. In terms impacts upon listed buildings, the site is near numerous heritage assets. These include the Grade II listed terrace house and shopfront at 39 Tottenham Street, the Grade II building and railings at 30 Tottenham Street, the Grade II building at 28 Tottenham Street, the Grade II buildings and railings at 24 and 26 Tottenham Street, the Grade II Former Strand Union Workhouse (Middlesex Hospital Annex) at 44 Cleveland Street, the Grade II King and Queen Public House at 1-2 Foley Street, the Grade II flat building at 45-49 Cleveland Street, the Grade II All Souls' Church Day School in Foley Street, the Grade II railings at the front of 16 to 22 Cleveland Street, the Grade II building and railings at 19-26 Goodge Place, the Grade II building at 56 Goodge Street, the Grade II building and railings at 8-14 Google Place, the Grade II building and railings at 72 Charlotte Street and the Grade II BT Communications Tower in Cleveland Mews. In addition to these listed building 49 Tottenham Street is a locally listed item and relates to a metal plate dated 1834, mounted on the wall of the building.
38. To assist in determining the level of harm caused by the development upon surrounding heritage, a view assessment formed part of the Heritage Statement. In accordance with the NPPF, London Plan and Publication London Plan, this assessment included verified views that illustrate that given the prevailing height of neighbouring buildings, the narrow width of streets and the recessed upper four levels, the proposed building when viewed in context with its surrounds would have minimal impact upon the prevailing urban character of the CSCA or the setting of nearby listed buildings. With respect to Listed Buildings, the scheme will be visible within the setting of the BT Tower when viewed from Goodge Place to the south. In this instance, the proposal top two levels will raise above the parapets of terrace building on the western side of Goodge Place. Although visible, the additional height is to the side of the view corridor to the tower and does not rise significantly higher than the parapet of the terrace to impede the silhouette of the BT Tower against the open sky backdrop. The impact of the scheme is not expected to harm the setting of the BT Tower when viewed from Goodge Place.
39. The main facade of the new building will be visible from listed buildings that front onto Tottenham Street and from Cleveland Street. The building will be wedged between the two adjoining buildings, both of which have significantly larger frontages to Tottenham Street. In terms of height, the proposed building will be one storey lower than the Arthur Stanley House to the right and one storey taller than the building to the left. The increased height of the main facade of the building will make it consistent in terms of height with its neighbours and this continuity is expected to enhance the overall quality and uniformity of the streetscape. In addition to the continuity in height, the heritage assessment states that proposed materials will be sympathetic to the surrounding buildings and the architectural detailing are likely to add visual interest and articulation to the street

façade. In terms of impacts upon listed buildings, GLA officers agree with the findings of the submitted Heritage Statement and are of the view that the high quality design and appearance of the proposed development will likely improve the visual setting of nearby listed buildings. Furthermore, the mass, scale and appearance of the building will not result in harm to heritage assets located in the wider area in accordance with NPPF guidelines. The scheme thereby also satisfies the objectives of both Policy 7.8 of the London Plan and Policy HC1 of the Publication London Plan.

LVMF Views

40. In terms of views, the site falls in the London Panorama of Parliament Hill and its Protected Vista (LVMF view 2A.2). Policy HC4 of the Publication London Plan states that development proposals should not harm and should seek to make a positive contribution to the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and where possible enhance viewers ability to recognise and to appreciate strategically important landmarks in these views and where appropriate protect the silhouette of landmarks elements of World Heritage Sites as seen from designated viewing places. In terms of impact, the proposed building will be consistent in height to its neighbours and will not exceed the threshold height of the Protected Vista. As such, the proposed will preserve the corridor thereby not impacting upon the viewers ability to recognise and appreciate the strategically important landmark from Parliament Hill.

Transport

Trip Generation and Public Transport Impacts

41. The site has a wide range of public transport options commensurate with its location. Although a trip generation assessment has not been provided officers are of the opinion that the development is unlikely to result in a significant increase in development related trips and/or freight movements. Consequently, the impact on public transport is also expected to be minimal and in this instance a contribution towards public transport service enhancement is not required.

Travel Plan

42. A full Travel Plan should be secured via a section 106 agreement. The targets of the Travel Plan should, throughout the Plan's lifespan, focus on increasing the active travel mode share in line with the Mayors Transport Strategy (MTS) mode shift target for inner London.

Construction and Servicing

43. At present servicing and waste collection takes place from the site's frontage on Tottenham Street. These existing arrangements are to remain for the proposed development and are considered acceptable. In line with Policy T7 (Deliveries, Servicing and Construction) of the Publication London Plan, a Delivery and Servicing Plan (DSP) should be submitted in line with Transport for London guidance. This should be secured through a condition and Transport for London should be consulted on this document.

44. A draft Construction Management Plan (CMP) has been submitted alongside this application. A full Construction Logistics (CLP) should be developed in accordance with Transport for London guidance and secured via a condition. The site is in a busy part of the CAZ and as such during construction, a safe route for walking, which is fully accessible for people of all ages and abilities, should always be provided on both sides of the street. The applicant should ensure all freight movements associated with construction vehicles are safe and in line with the Mayor's Vision Zero approach to eliminating death and serious injury on the road network. Officers also support the applicant's commitment to appoint a silver FORS accredited contractor and the use of traffic marshals/banksmen. The applicant has suggested the possibility of employing a delivery booking system, a holding facility and a consolidation centre. All these measures would minimise the need for additional freight trips and ensure cleaner and more efficient freight. These initiatives are strongly supported and should be secured by condition.

Car parking

45. The development will be car free which is strongly supported. The proposal to restrict future residential and business occupants from applying for parking permits on the surrounding streets is also supported. In terms of disabled parking, three disabled parking spaces are already provided on Tottenham Street. Given the site constraints, it is considered acceptable to utilise the existing on-street spaces for residents and visitors of the development in lieu of providing spaces on site.

Cycle parking

46. The proposed seven long stay cycle parking spaces complies with the minimum standards set out in Policy T5 (Cycle parking) of the Publication London Plan. All spaces should be designed and laid out in accordance with the London Cycling Design Standards (LCDS). Cycle parking will be provided within the basement, accessed via a lift that would only be able to accommodate a cycle of 1.8m in length across its diagonal. This does not comply with LCDS and if it is not possible to provide a larger lift, the applicant should look to provide at least one cargo and/or adapted cycle stand within the site boundary. At present, there is space at the frontage of the building where the black rails stand where this cycle space could be accommodated, however if this is not a practical location then the applicant should work with the borough to provide cycle parking in the public realm for cargo cycles and adapted cycles for disabled people.

Sustainable development

Energy strategy

47. In accordance with the principles of the London Plan Policy 5.2 and Policy S12 of the Publication London Plan, the application includes details of how the development proposes to reduce carbon dioxide emissions. The information revealed that neither the domestic or commercial element of the proposed development appear to achieve any carbon savings from energy efficiency alone compared to a 2013 Building Regulations compliant development. The applicant should therefore model additional energy efficiency (EE) measures and aspire to meet the EE targets. In terms of carbon dioxide savings, the proposed figure appears to fall short of the on-site target within the London Plan. However, it is

acknowledged that there is little further potential for carbon dioxide reduction on-site. In terms of renewable energy technology, it is expected that the development maximises on-site renewable energy generation and this is regardless of whether the minimum on-site carbon dioxide emission improvement target has already been reached through earlier stages of the energy hierarchy. It is suggested that the applicant reinvestigate the inclusion of renewable technologies. Detailed energy comments have been provided separately.

Urban greening

48. The proposal is subject to London Plan Policies 2.18 (Green Infrastructure), Policy 5.10 (Urban Greening) and Policy 5.11 (Green roofs and development site environs) Policies G1 (Green Infrastructure) and Policy G5 (Urban Greening) of the Publication London Plan are also relevant to this proposal. In accordance with these policies, the applicant should provide details demonstrating how that scheme meets the Urban Greening Factor (UGF) target of 0.4 for predominantly residential development.

Circular Economy

49. To determine how the proposal will aim to achieve circular economy outcomes and aim to be net zero-waste, a circular economy statement should be submitted prior to the determination of the application in accordance with Policy S17 of the Publication London Plan. The statement should demonstrate a commitment to achieving targets for reusing/recycling/recovering, provide a notification of the likely destination of all waste streams (beyond the Materials Recycling Facility) and submit a written confirmation that the destination landfill(s) has/ have the capacity to receive waste.

Local planning authority's position

50. Camden Council planning officers are currently assessing the application. The application is expected to be considered at a planning committee meeting in early 2021.

Legal considerations

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

Financial considerations

52. There are no financial considerations at this stage.

Conclusion

53. London Plan policies on the Central Activities Zone, land use principles, housing, urban design, sustainable development, heritage and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan:

- **Principle of development:** The principle of the comprehensive redevelopment of the site with a mixed-use development that retains employment floor space on-site and enhances the quality and mix of residential units is supported in principle. The proposed affordable workspace should be secured in the s106 agreement.
- **Housing:** The scale of the development means it is not required to provide on-site Affordable Housing. The enhancement of the quality and mix of housing within a predominately residential neighbourhood of the Central Activities Zone is supported.
- **Urban Design, Heritage and Views:** Strategically, the overall height, mass and scale of the scheme is supported as it will not impact upon the character of the Conservation Area or impede on strategically important landmark views. Additional information regarding the Fire Safety Statement must be provided prior to determination.
- **Transport:** The developments impact on public transport is also expected to be minimal and a contribution towards public transport service enhancement is not required. The quantum of cycle storage is acceptable, however a cargo and/or adapted cycle stand within the site should be provided. A Travel Plan should be secured.
- **Sustainability:** Further information on energy, urban greening and the circular economy is required.

For further information, contact GLA Planning Unit (Development Management Team):

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