

Planning Statement

Prepared by Icen Projects

Submitted on behalf of Lab Selkirk House Ltd

Selkirk House, 166 High Holborn and 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street, London, WC1A 1JR

September 2022

Rev 01



SEPTEMBER
2022

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Iceni Projects Limited on behalf of
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Planning Statement
SELKIRK HOUSE, 166 HIGH HOLBORN AND 1
MUSEUM STREET, 10-12 MUSEUM STREET, 35-41 NEW
OXFORD STREET AND 16A-18 WEST CENTRAL
STREET, LONDON, WC1A 1JR

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1. INTRODUCTION

Application Format

1.1 This Planning Statement is submitted to the London Borough of Camden ('the Council') on behalf of Lab Selkirk House Ltd ('the Applicant') in support of an application for planning permission for the proposed development at Selkirk House, 166 High Holborn and 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street, London, WC1A 1JR' ('the site').

1.2 The application seeks planning permission for:

“Redevelopment of Selkirk House, 166 High Holborn and 1 Museum Street following the substantial demolition of the existing NCP car park and former Travelodge Hotel to provide a mixed-use scheme, providing office, residential, and town centre uses at ground floor level. Works of demolition, remodelling and extension to 10-12 Museum Street, 35-41 New Oxford Street, and 16A-18 West Central Street to provide further town centre ground floor uses and residential floorspace, including affordable housing provision. Provision of new public realm including a new pedestrian route through the site to link West Central Street with High Holborn. Relocation of cycle hire docking stations on High Holborn.”

1.3 This Planning Statement has been prepared by Iceni Projects Ltd and provides the planning case in support of the proposed development. It assesses the development in the context of relevant adopted and emerging planning policy and guidance at national, regional and local levels, together with other material considerations.

1.4 This Statement should be read in conjunction with the documents, plans and technical studies submitted to accompany the application, as set out below.

Formal Submission Documents

1.5 The formal documents submitted for approval as part of the planning application include the following documents:

- The planning application forms;
- The land ownership and agricultural holdings certificate;
- Site location plan;

- Existing drawings;
- Proposed drawings; and
- Community Infrastructure Levy form.

Supporting Submission Documents

1.6 The planning application is accompanied by a number of supporting documents and studies. These supporting documents are submitted with the aim of assisting both the understanding and evaluation of the proposals.

1.7 The following supporting documents justify the proposals in the context of planning policy and other material considerations:

- Planning Statement, prepared by Icen Projects;
- Design and Access Statement, prepared by DSDHA;
- Affordable Housing Financial Viability Assessment, prepared by Gerald Eve
- Affordable Housing Statement, prepared by Gerald Eve;
- Air Quality Assessment, prepared by Arup;
- Arboricultural Assessment, prepared by Tim Moya Associates;
- Archaeological Assessment, prepared by Arup;
- Basement Impact & Structural Impact Assessment, prepared by Meinhardt;
- Circular Economy Statement, prepared by Scotch Partners;
- Construction Management Plan, prepared by Arup;
- Crime Impact Assessment, prepared by Hurley Palmer Flatt;
- Daylight and Sunlight and Overshadowing Assessment, prepared by GIA;
- Delivery and Servicing Management Plan, prepared by Arup;
- Internal Daylight, Sunlight and Overshadowing Assessment, prepared by GIA;
- Demolition Environmental Management Plan, prepared by Arup

- Below Ground Drainage Strategy prepared by Meinhardt
- Ecology Statement, prepared by BHSLA;
- Energy Assessment, prepared by Scotch Partners;
- Environmental Wind Planning Report, prepared by Arup;
- Fire Statement, prepared by Jensen Hughes Company;
- Flood Risk Assessment, prepared by Arup;
- Framework Travel Plan, prepared by Arup;
- Health Impact Assessment, prepared by Icen Projects;
- Heritage, Townscape and Visual Impact Assessment, prepared by The Townscape Consultancy;
- Hotel Needs Assessment, prepared by Icen;
- Noise and Vibration Impact Assessment, prepared by Scotch Partners;
- Site Waste Management Plan Construction Phase, prepared by Arup,
- Site Waste Management Plan Demolition Phase, prepared by Arup,
- Socio-Economic Statement, prepared by Icen
- Statement of Community Involvement, prepared by LCA
- Statement of Developer Contributions, prepared by Icen Projects
- Sustainability Statement, prepared by Scotch Partners;
- Transport Assessment, prepared by Arup;

Overview of Proposed Development

1.8 The proposed development falls within one red line area and comprises of the following components:

- **Museum Street** - a single new building rising to 19 storeys, providing office (Class E(g)(i)) accommodation on upper levels and a range of flexible town centre uses (Class E) at ground level.

- **High Holborn** - a single new building rising to 6 storeys, providing residential (Class C3) accommodation on upper levels and a flexible town centre use (Class E) at ground level.
- **Vine Lane** - a single new building rising to 5 storeys, providing market residential units with a flexible town centre use (Class E) at ground level.
- **West Central Street** - a series of new and refurbished buildings rising to 6 storeys, providing residential accommodation (market, LCR and Intermediate) on upper levels (Class C3) and flexible town centre uses (Class E) at ground level.

1.9 In summary, the proposed development is seeking detailed planning permission for:

- **22,650 sqm (GIA) of office floorspace** falling within Class E(g)(i). This will be provided within the Museum Street building. .
- **1,547 sqm (GIA) of flexible town centre floorspace** at ground floor level falling within Class E. This will be provided within the Museum Street, Vine Lane, High Holborn, and West Central Street buildings. The planning application specifies the range of uses within Class E that each of these units is seeking permission for.
- **4,502 sqm (GIA)** of residential floorspace will be provided. This represents an uplift of **2,588 sqm (GIA)** of residential floorspace falling within Class C3. This will be provided within the West Central Street, Vine Lane and High Holborn buildings.
- Two basements which will be used for cycle parking, servicing areas, plant, storage, and other ancillary uses.
- A high proportion of open space across the site totalling **2, 197 sqm**, provided as public realm, pocket parks, communal areas, play space and private amenity for residents and office occupants.
- The creation of a new public pedestrian route through the site known as '**Vine Lane**', which will link High Holborn with West Central Street.

1.10 The proposed development has evolved through an extensive pre-application and wider stakeholder consultation process, which has included collaborative discussions with the Council, Greater London Authority ('GLA'), Transport for London ('TfL'), Historic England ('HE'), and a number of other key stakeholders.

1.11 The proposed development provides the opportunity to regenerate this strategically important site through the demolition and refurbishment of the existing poor-quality buildings and replacement with a highly sustainable mixed-use development. The proposed development will deliver all the key master planning requirements and uses specified by the Local Plan (2017), the draft Holborn Vision and Urban Strategy (2019), and the Draft Site Allocations Plan (2020), providing the opportunity to deliver a wide range of planning and public benefits.

1.12 This Planning Statement assesses the planning considerations associated with the proposed development in the context of national, regional and local planning policy and guidance. The Statement concludes that the proposed development accords with policy and will provide a wide range of planning and public benefits, including but not limited to the following:

- The proposed development will provide economic, social and environmental benefits and represents a truly sustainable development of the site.
- The site is brownfield land in a highly accessible location and currently contributes little to the local community. The proposed development will provide a wide range of uses and will optimise the use of the land in line with the Mayor of London's strategic 'Good Growth' agenda.
- The proposed development will deliver all the key master planning requirements and uses specified by the Local Plan (2017), the Holborn Vision and Urban Strategy (2019), and the Draft Site Allocations Plan (2020).
- The proposed development will replace a vacant building and large NCP multi storey car park, which currently houses anti-social behaviour, detracts from the area visually, and does little to activate the street. The proposed development will replace the existing uses with a bespoke office-led development, with vibrant associated ancillary uses at ground level, suitable for small businesses and accessible to the local community.
- The Applicant is committed to delivering affordable workspace as part of the development.
- Across the ground floor of the proposed development a range of flexible town centre uses will be provided. This provision will focus on small retail, food, beverage and other uses which will activate all frontages of the proposed development, replacing the dead frontages currently dictated by the NCP car park. The provision of active uses across the site suitable for small occupiers is a key aspiration within the Holborn Vision and Urban Strategy (2019), and this will have a positive impact on the lives of local residents, workers and visitors – supporting both the day and night-time economy.

- The introduction of a wide range of non-residential uses will have a positive impact on the local economy and generate significant employment growth in the area. This will be in the form of employment opportunities created during the construction of the development and within the development itself as well as secondary employment opportunities to local businesses e.g. a local laundry, a printing company, or a food and drink supplier. The proposed mix of uses will have a positive impact and support the wider functions of the CAZ, attracting people to the area and encouraging business and leisure tourism within the Borough.
- In accordance with Local Plan 'Mixed-Use' Policy H2, the proposed development will provide 50% of all additional floorspace as self-contained housing - this will be through a combination of on-site provision and, subject to viability, a payment in lieu for any shortfall of market housing.
- The proposed development will deliver 51 % of the required housing floorspace as affordable housing and this will all be on site. The affordable housing provision will be provided within the new build component of the WCS buildings, providing a range of high-quality new homes and associated amenity and play spaces in accordance with policy. Market housing is provided on High Holborn, Vine Lane and within part of the refurbished component of the West Central Street block.
- As part of the ground floor and place making strategy for the site, improved pedestrian legibility and permeability around and through the site will be delivered. This will include a public open-air arcade which will run through the heart of the site, creating a new 'destination' for this part of Holborn. This will address the policy aspirations within the draft Holborn Vision and Urban Strategy (2019) and the Draft Site Allocations Plan (2020). The new route through the site will also help facilitate future developments in the surrounding area by providing the opportunity to significantly enhance physical and visual permeability.
- The proposed development will improve biodiversity at the site through the introduction of urban greening at upper levels in the form of amenity spaces, tree planting, and green roofs where possible. The urban greening and landscaping strategy will also improve drainage at the site through the implementation of a range of innovative Sustainable Urban Drainage (SuDs) components and increased ground permeability across the site. The Urban Greening Factor (UGF) for the site is 0.3.
- The proposed development promotes sustainable modes of transport and will be completely car free. In addition to the removal of the excessive car parking provided by the existing NCP park, this will have a positive impact on local air quality by reducing vehicles movements to and from the site.

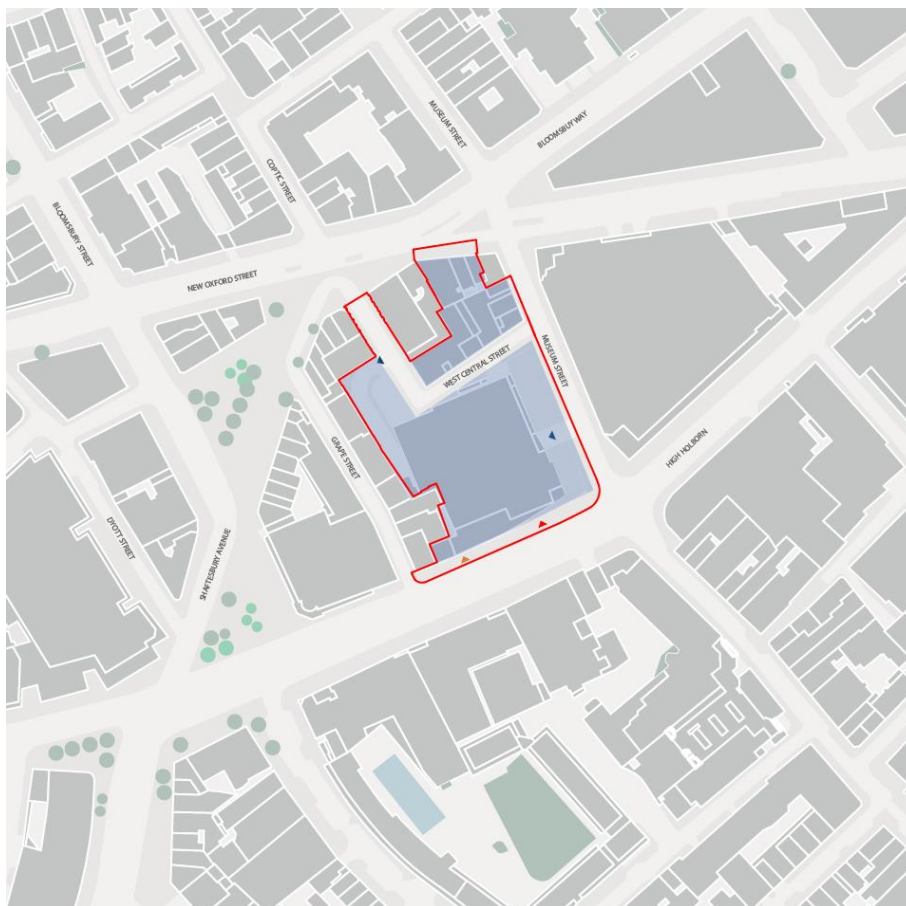
- The design of the proposed development will be of the highest architectural standards, which has taken reference from local design queues and materials. The proposed development introduces buildings of a more elegant built form which improves both local and longer key views, enhancing the heritage assets that have been identified.
- The Applicant will comply with the relevant requirements relating to planning obligations and CIL, bringing opportunities to enhance the local infrastructure in the area for residents, workers and visitors. The anticipated draft HOTs have been set out within this note.

1.13 Overall, the scheme will deliver a wide range of economic, social and environmental benefits and represents the sustainable redevelopment of the site.

2. THE SITE AND SURROUNDING AREA

- 2.1 The site is located within the Holborn and Covent Garden Ward of the London Borough of Camden ('the Council'). The site comprises a number of individual different buildings within the red line area, which includes Selkirk House (166 High Holborn and 1 Museum Street), 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street.
- 2.2 The site is bounded by High Holborn to the south, Museum Street to the east and New Oxford Street to the north, with the rear of the properties fronting Grape Street forming the western boundary. West Central Street dissects the site and separates out Selkirk House from the New Oxford Street and West Central Street block (known as the West Central Street component of the site).

Figure 2.1 Site Location Plan



- 2.3 Selkirk House comprises a 17-storey building (78.6m AOD), which includes two basement levels, and a further partial basement level. Selkirk House is occupied by the former Travelodge hotel building (originally constructed in the 1960's for office purposes) and a NCP car park. The former Travelodge building provided overspill accommodation from the primary Travelodge hotel building

on the opposite side of High Holborn, however, the hotel use at the site ceased all operation in June 2020. At lower levels there is an NCP car park set across basement to second floor level.

- 2.4 The West Central Street buildings are predominantly in retail use at ground floor level fronting New Oxford Street. The basement, first and second floors of No. 39 – 41 are in office use with the upper floors of 35 – 37 being in residential use. No's 16a, 16b and 18 West Central Street were previously in use as a nightclub at basement level with offices above
- 2.5 The West Central Street component of the site falls within the Bloomsbury Conservation Area. There are no listed buildings on the site, however, Grade II listed buildings adjoin the site boundary at 43-45 New Oxford Street and 16 West Central Street. No. 33-41 New Oxford Street, 10-12 Museum Street and 16A-18 West Central Street are each identified as 'positive contributors' in the Conservation Area Appraisal. The shopfronts at numbers 10 and 11 Museum Street are identified separately as positive contributors to the Conservation Area. Selkirk House sits outside of the Conservation Area boundary which runs along West Central Street.
- 2.6 The site is located in close proximity to a number of well known, large-scale developments including, Centre Point, Central St Giles, and the Post Office Building development directly adjacent. Notably, further to the north of the site lies the British Museum.
- 2.7 The site benefits from a PTAL rating of 6b being close to three underground stations, namely Holborn to the east, Tottenham Court Road to the south-west (also including the future Crossrail station) and Covent Garden to the south. This area of London is very well served by bus routes on High Holborn and New Oxford Street. High Holborn and New Oxford Street are also on the London Cycle Network and experience high levels of commuter cycling.
- 2.8 There are high levels of pedestrian movements in the area surrounding the site and this is expected to increase when Crossrail opens. The site is situated within an urban island bound and fragmented by a busy multi-lane, one-way system.
- 2.9 Public realm improvements are being brought forward as part of the West End Project, which will link in with the popular tourist routes from either Leicester Square or Covent Garden to the British Museum. Works are currently under way on the West End Project and this will make significant improvements, easing congestion and rebalancing the priority of public realm towards the pedestrian and cyclist.

Planning History

2.10 A full review of the Council's planning policy records has been undertaken and identifies a number of relevant planning applications which have been submitted for the site. Of particular relevance are the following:

- The change of use of Selkirk House from offices (use class B1) to hotel (use class C1) and restaurant (use class A3) granted in April 2005 (LPA Ref. PSX0204780). It is noted that the application form associated with this permission makes reference to the retention of existing residential accommodation. This was provided across the 14th and 15th floors of Selkirk House in the form of 11 duplex units, totalling 1,332 sqm (GIA) of floorspace. Following the implementation of the consent the 11 duplex units have been in use as serviced apartments (Use Class C1) and the residential use at the site has ceased.
- The refurbishment and extension of 35-41 New Oxford Street, 10-12 Museum Street, 16A – 18 West Central Street to provide a mixed use scheme including 19 self-contained residential units, flexible A1/A2/A3 uses and B1 and/or D1 at basement and ground floor levels, granted in May 2017 (LPA Ref. 2016/0477P). This consent was not implemented and has since expired.

2.11 The planning permission to the neighbouring site, 21 -31 New Oxford Street is also noteworthy in the context of the proposed development. Planning permission was granted in March 2015 for the remodelling, refurbishment and extension of the existing former postal sorting office, including the formation of a new public roof terrace, private terraces, winter gardens, roof top plant and new entrance in connection with the change of use of the building to offices (Class B1), retail/restaurant/doctors' surgery uses (Class A1/A3/D1) and 21 affordable housing units (Class C3), along with associated highway, landscaping and public realm improvement works (LPA Ref. 2014/5946/P).

3. THE PROPOSED DEVELOPMENT

3.1 This section outlines the proposed development for the site. The planning application seeks planning permission for the following description of development:

“Redevelopment of Selkirk House, 166 High Holborn and 1 Museum Street following the substantial demolition of the existing NCP car park and former Travelodge Hotel to provide a mixed-use scheme, providing office, residential, and town centre uses at ground floor level. Works of demolition, remodelling and extension to 10-12 Museum Street, 35-41 New Oxford Street, and 16A-18 West Central Street to provide further town centre ground floor uses and residential floorspace, including affordable housing provision. Provision of new public realm including a new pedestrian route through the site to link West Central Street with High Holborn. Relocation of cycle hire docking stations on High Holborn.”

Amendments to Scheme

3.2 This submission has been made in order to secure amendments to the originally submitted proposals following further consultation with interested parties, LBC, GLA and Historic England.

3.3 The key changes to the proposals are as follows:

- 1 Museum Street – a reduction in office building height from ground floor plus 20 storeys to ground floor plus 18 storeys. This represents a drop in height from 80.2m above ground to 73.95, above ground.
- An increase in office floor area (Class E (g) (i)) from 21,566 sq m to 22,650 sq m (GIA); and
- Conversion of the proposed Vine Lane building from office use to residential, increasing the overall number of residential units from 29 to 48. This includes the provision of 18 affordable units in the West Central Street building.

3.4 Full details of how the proposed development has evolved through the consultation and engagement process is outlined in the next section of this Planning Statement and also within the supporting Design and Access Statement prepared by DSDHA and the Statement of Community Involvement prepared by LCA. These have been updated to reflect consultation activity following the submission of the original proposals.

Non-Residential Uses

3.5 The proposed development will provide up to **24,197 sqm (GIA)** of non-residential floorspace. This specifically comprises:

- **22, 650 sqm (GIA)** of office floorspace (Class E(g)(i))
- **1,547 sqm (GIA)** flexible town centre uses floorspace (Class E(g)(i)), specifically comprising:
 - **186 sqm (GIA)** of open Class E floorspace.
 - **1,361 sqm (GIA)** of restricted Class E floorspace (allowing all Class E uses except for office (E(g)(i)) and research and development (E(g)(ii)).

Residential Use

3.6 The proposed development will provide 48 residential units totalling **4,502 sqm (GIA)** which is an uplift of **2,588 sqm (GIA)** when compared to the existing provision of residential floorspace falling within Use Class C3 on site. This includes **18 affordable homes** equating to **51% affordable housing on a floorspace basis**.

3.7 The residential component will be provided as mix of 1 bedroom to 5-bedroom homes with the following site wide housing mix.

Table 3.1 Proposed housing mix

	LCR (WCS)	Intermediate (WCS)	Market Sales (WCS)	Market Sales (HH & VL)	Totals
1B1P			1		1
1B2P		4	4	19	27
2B3P	4	4	2	1	11
2B4P		1		2	3
3B4P	4				4
3B5P				1	1

5B7P	1				1
	9	9	7	23	48

Habitable Rooms

- 3.8 The 48 residential units proposed will provide **126 habitable rooms** in total, and an increase **69 habitable rooms** compared to existing situation across the site. The affordable housing provision will consist of **58 habitable rooms**.

Table 3.2 Existing Habitable Room Summary

Address	Tenure	Habitable Rooms
35/37 NOS	Market	12
12 MS	Market	9
10 MS (WCS)	HMO	6
Selkirk House	Serviced Apartments	30
Total	-	57

Table 3.3 Proposed Habitable Room Summary

Address	Tenure	Habitable Rooms
West Central	LCR	35
	Intermediate	23
	Market	16
Vine Lane	Market	41
High Holborn	Market	11

Total	-	126
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Table 3.4 Existing and Proposed Habitable Room Summary

Existing		Proposed	
LCR	0	LCR	35
Intermediate	0	Intermediate	23
HMO	6	HMO	0
Serviced Apartments	30	Serviced Apartments	0
Market	21	Market	68
Total	57	Total	126

Built Form

3.9 Information on the detailed design of the separate elements of the scheme is provided within the Design and Access Statement submitted in support of this application. In summary, the proposed development comprises the following separate areas and built form across the site:

- 1 Museum Street - a single new building rising to 19 storeys
- High Holborn - a single new building rising to 6 storeys
- Vine Lane - a single new building rising to 5 storeys
- West Central Street - a series of new and refurbished buildings rising to 6 storeys
- Wider masterplan and landscaping including new pedestrian route through the site known as 'Vine Lane' linking High Holborn and West Central Street.

Open Space, Private Amenity and Public Realm

- 3.10 The proposed development will include extensive provision of open space provision across the site totalling **2, 197 sqm**.
- 3.11 The open space provision across the site will comprise of:
- **1083 sqm** provided as public realm within the Applicant's ownership across the site.
 - **509 sqm** provided as communal offices terraces within the Vina Lane and Museum Street buildings.
 - **151 sqm** provided as play space within the West Central Street courtyard, which also provides communal open space for residents of those buildings.
 - **195 sqm** of communal open space within the Vine Lane block - **74 sqm** within the courtyard and **121 sqm** at level 4.
 - **129 sqm for WCS and 130 sqm for VL** of private amenity space.
- 3.12 In addition to the open space provision within the Applicant's ownership, **729 sqm** of public realm and streetscape improvements outside of the Applicant's ownership is proposed.
- 3.13 The creation of new public pedestrian route through the site known as '**Vine Lane**' forms a key park of the proposals, linking High Holborn with West Central Street.

Transport and Access

Car parking

- 3.14 The proposed development seeks to promote sustainable modes of transport. Therefore, no car parking spaces are proposed on site.

Cycle parking

- 3.15 A total of **438** long-stay cycle parking spaces and **62** short-stay cycle parking spaces are proposed which will be allocated as follows:
- 345 long stay cycle parking spaces allocated to the office component.
 - 9 long stay cycle parking spaces allocated to the flexible town centre uses floorspace component.

- 84 long stay cycle parking spaces allocated to the residential component.
- 62 cycle parking spaces allocated to visitors to the site and located within the public realm areas.

Servicing & Refuse

- 3.16 A dedicated servicing yard will be provided in the basement of the Museum Street block, accessed via a lift from High Holborn for the benefit of the Museum Street and Vine Lane buildings. Servicing for buildings located on High Holborn or West Central Street is proposed to take place from the existing loading bay on Museum Street and a newly proposed loading bay on Grape Street as part of the wider West End Project proposals.
- 3.17 Commercial waste is due to be stored either at basement level, in the case of Museum Street and Vine Street or within proposed units, to be moved to loading bays or the kerb prior to collection. Residential waste will be brought to bin stores by residents and Council operatives will collect waste directly from these stores.

4. CONSULTATION AND ENGAGEMENT

4.1 The proposed development has evolved through an extensive pre-application and wider stakeholder consultation process, which has included collaborative discussions with the following key authorities and advisory bodies:

- London Borough of Camden (the 'Council');
- Greater London Authority (GLA);
- Transport for London (TfL);
- Historic England (HE); and
- The Council's Design Review Panel
- The Council's Strategic Panel
- The Council's Development Management Forum

4.2 Full details of how the design of the proposed development has evolved through the pre-application process is set out within the supporting Design and Access Statement prepared by DSDHA.

4.3 In addition, the Applicant has consulted with local residents and interest groups. Full details of the public consultation process is set out in the Statement of Community Involvement (SCI) which has been prepared by LCA and accompanies this planning application. This has been updated following the additional consultation activity which has taken place since the application was submitted.

Consultations with London Borough of Camden

4.4 As part of the design development process, the Applicant has engaged in extensive pre-application discussions with Planning, Design and other specialist Officers at the Council. A number of strategic and individual building pre-application reviews have taken place over an 2.5 year period as set out below.

Date	Meeting	Meeting Focus
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July 2019	Pre-application 1	Principle of demolition, 1 Museum Street bulk and massing, public realm improvements and land use approach
September 2019	Pre-application 2	1 Museum Street architecture, proposed new pedestrian route and initial massing / quantum studies and heritage assessment for WCS buildings.
September 2019	Pre-application 3	Masterplan design development
November 2019	1 Museum Street Workshop	1 Museum Street building
March 2020	West Central Street Workshop	West Central Street buildings
April 2020	Transport Workshop	Public realm, transport and servicing
May 2020	West Central Street Workshop	West Central Street buildings
June 2020	Pre-Application 4	Site wide analysis
September 2020	Transport Workshop	Public realm, transport and servicing
November 2020	1 Museum Street Workshop	1 Museum Street building
December 2020	Vine Lane and High Holborn Workshop	Vine Lane and High Holborn buildings
January 2021	Pre-Application 5	Site wide analysis
ORIGINAL APPLICATION SUBMITTED APRIL 2021		
August 2021	Vine Lane Workshop	Massing and change in use to residential
December 2021	Vine Lane and Museum Street Workshop	Height and massing

February 2022	Meeting with LBC	Process and next steps
March 2022	Highway and Public Realm Review	Public realm
March 2022	Museum Street site tours	All matters
April 2022	Public Exhibitions	All matters
July 2022	Meeting with LBC	Introduction to new site owners
September 2022	Meeting with LBC	Ground and first floor of 1 Museum Street

4.5 Throughout the pre-application process, the Applicant has sought to work collaboratively with the Council. Following each meeting and as a part of the evolution of the proposed development, the Applicant has made a number of design amendments to respond to feedback that have been provided by Officers at the Council on the key site issues.

4.6 A full summary of feedback from these meetings, in addition to the result design development is contained within the accompanying Design and Access Statement.

Consultations with the Council's Strategic Review Panel

4.7 As part of the design development process, the Applicant has also engaged in consultation with the Councils' Strategic Review Panel in October 2019.

4.8 The Panel agreed that the existing building has a detrimental impact on the local area and wider surrounds and that the site provides a major opportunity to develop proposals which would have benefits to the townscape and community. The Panel noted their key priorities for the site which were; a high quality designed building, land uses which build on the local economy, sustainability taking a key place in the design proposals and the creation of a vibrant neighbourhood.

4.9 In assessing the proposals, the Panel highlighted that they had no concern with regards to the increased height, highlighting the ability of the building to improve key views and allow for a preferable land use package and community benefits.

4.10 The Panel noted the importance of connecting the development with the Holborn Vision and West End Project and to acknowledge an increase in pedestrian movement due to Crossrail. Feedback on

the proposed new pedestrian route was positive, but the Panel highlighted existing anti-social behaviour in the area and that the route should discourage this.

Consultations with the Council's Design Review Panel

- 4.11 The Applicant has also engaged in consultation with the Councils' Design Review Panel on two occasions, November 2019 and October 2020.
- 4.12 The first DRP took place on 22nd November 2019 and encompassed a site visit by the panellists and detailed presentation from the Applicant team. Feedback from the panel was positive. The Panel requested further information and visuals to support the proposed height, form and positioning of the tower on the site and requested the proposed passageway was further explored to understand its role. Other comments centred around the retention vs demolition of the West Central Street site, how the scheme would be serviced and loss of trees around the site.
- 4.13 The second DRP took place on 23rd October 2020. Overall, the meeting was very positive, supporting the principle of height and recognising that the proposed tower could form an elegant landmark building. The summary feedback noted that there was 'much to admire in the merging proposals' and that they were 'broadly supportive of the design strategy, including the opening up of new routes and retention of existing historic buildings'. Advice was provided in terms of further articulation to the top of the tower and further review of daylight and sunlight levels within the proposed courtyard analysed. The panel supported the architectural language of the proposals but requested further microclimate testing, urban greening and if possible, retention of the Cat B tree on High Holborn.

Consultations with the GLA

- 4.14 In addition to pre-application discussions with the Council, pre-application discussions were held with the GLA in December 2019 (Ref. GLA/5334) and August 2020 (Ref. 2020/6268/P2F).
- 4.15 The first pre-application took place on 17th December 2019 and sought advice on the redevelopment of the existing NCP car park and Travelodge Hotel at 1 Museum Street with a hotel-led mixed-use development. The scheme also put forward the remodelling, refurbishment and extension of 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street to provide further active ground floor uses and residential floorspace, including affordable housing provision. The proposals incorporated improvements to the wider public realm and the provision of a new pedestrian route through the site to link West Central Street with High Holborn.
- 4.16 Officers at the GLA raised the following key points:
- Principle of redevelopment of the site for a mixed-use development was deemed acceptable

- Proposed height and massing of 1 Museum Street acceptable, subject to detailed design.
- Schemes response to surrounding character and context deemed positive but extent of demolition proposed would need to be justified from a heritage context.
- Provision of pedestrian route and public realm improvements regarded as positive

4.17 The second GLA pre-application took place on 19th August 2020. This scheme altered from that of December 2019 through the removal of the hotel provision to be replaced with an office-led scheme. Officers raised the following key points on the proposals:

- Principle of loss of hotel acceptable and office-led redevelopment of the site with mixed use, including residential use was strongly supported.
- The principle of the redevelopment of the site was dependent upon heritage harm being outweighed by the wider public benefits of the scheme.
- Target delivery of a minimum of 35% affordable housing was welcomed.
- Design progression was regarded as positive, with the proposed layout of the site, with new and improved connections and public realm regarded as providing significant benefits to the public.
- The height of the proposed tower was regarded as appropriate for a highly accessible site within an Opportunity Area. Officers noted the proposed development was not deemed a concern noting that the building would replace an existing tall building and be of much higher quality than the existing development. Officers also confirmed that the building did not appear to have a significant impact on strategic views.
- Officers were supportive of the design approach to the High Holborn and Grape Street components .
- The scale and design of the West Central Street new buildings were regarded as suitable. Officers noted that the 5-storey corner building for 16A WCS works well and would contribute positively to the surroundings. Officers noted that care needed to be ensure that additions to 39-41 New Oxford Street do not unbalanced the parapet line and that a more contemporary approach could be explored. Officers also highlighted that a further review of the materiality of 10-12 Museum Street extension should be explored to prevent the addition appearing top heavy.

- It was acknowledged that the proposals put forward had a shortfall in long and short stay cycle parking. Officers noted that there is insufficient space at grade, some low-impact on-street locations should be identified in liaison with the Council.

Public Consultation

- 4.18 A thorough approach has been taken to consult with local residents, community groups, local businesses and organisations. The consultation has aimed to fully explain the context for the proposals, present the designs for the Site and respond to comments and questions raised.
- 4.19 The Applicant organised, publicised and launched an online consultation programme instead of the originally intended strategy due to the implementation of the national lockdown brought on as a result of the Covid-19 pandemic.
- 4.20 A summary of consultation undertaken to date is contained below.

November and December 2019

- 4.21 Engagement with local stakeholder groups and ward councillors including the Bloomsbury Conservation Area Advisory Committee, South Bloomsbury TRA and the Covent Garden Community Association.

March 2020

- 4.22 The planned second wider phase of consultation on the updated scheme coincided at the same time as the Covid-19 pandemic and national lockdown which restricted face-to-face engagement and the design team therefore took the decision to delay this. Correspondence with stakeholders continued throughout this period of lockdown.

October 2020

- 4.23 Launch of digital consultation on a bespoke consultation website, with exhibition boards introducing the updated proposals.
- 4.24 The Applicant wrote to key local residents, stakeholders and groups publicising the consultation (a total of 2588 flyers distributed), advertised it in the Camden New Journal and ran a social media campaign on Facebook and Instagram.
- 4.25 The total social media reach by December 2020 was 21,572, which contributed to 995 visits to the consultation website.

December 2020

- 4.26 The Applicant wrote again to key stakeholders including key councillors, local businesses and community groups. This included meetings with the Bloomsbury Association, Covent Garden Community Association and the South Bloomsbury TRA.
- 4.27 Development Management Forum (DMF) on 10th December 2020 attended by 32 people and available on the Council's website to watch after the event.
- 4.28 The following headline points were raised:
- Concerns regarding the height of the building
 - Questions as to whether there is still demand for an office building in Holborn in light of the Covid-19 pandemic
 - Implications on the air quality and pollution in this area of Holborn
 - Need for affordable homes and supermarkets/ retail for residents
 - Questions as to the colour pallet and design

February 2021

- 4.29 Following the DMF in December 2020, the Applicant launched a second digital consultation in February 2021 to present the final detailed designs of the proposals to show the local community how the designs had developed since the last phase of consultation.
- 4.30 To promote the launch the Applicant wrote to key local stakeholders and groups publicising the consultation (a total of 2,588 flyers distributed), advertised it in the Camden New Journal and ran a social media campaign on Facebook and Instagram.
- 4.31 The total social media reach for February 2021 was 26,090, which contributed to 1,500 visits to the consultation website.

March 2021

- 4.32 The Applicant presented the scheme to the Council's Planning Committee members and Ward Councillors at the Developers Briefing. The Applicant also met with BeeMidtown and presented the scheme.

April 2021

4.33 The Applicant attended a meeting with twelve local groups including: The Bloomsbury Association; The Covent Garden Community Association; The Covent Garden Area Trust; Save Bloomsbury; Bloomsbury Conservation Area Advisory Committee; The Soho Society; Leicester Square Association; South Bloomsbury Tenants and Residents' Association; Tavistock Chambers Residents' Association; West Central Street Residents' Association; Grape Street Residents' Association and Willoughby Street Residents Association. To answer questions on the night, the Applicant brought along a full project team, including visualisation specialists Millar Hare to show views and to help inform discussion on height.

Summary of Feedback

4.34 In total, there were responses from 35 stakeholders and residents submitted through the consultation inbox and through website surveys for the original application.

4.35 Of all responses received to date, 14 (40%) local stakeholders and residents are identified as being positive towards the proposals, with 6 (17%) identified as having neutral views and 16 (45%) as negative views.

4.36 The following headline points were raised as part of this consultation:

- Concerns regarding the height of the building
- Questions as to whether there is still demand for an office building in Holborn in light of the Covid-19 pandemic
- Implications on the air quality and pollution in this area of Holborn
- Need for affordable homes and supermarkets/ retail for residents
- Questions as to the colour pallet and design

4.37 Further details relating to the public consultation can be found in the accompanying updated Statement of Community Engagement report submitted in support of this application.

Post-Submission Consultation

4.38 Community engagement has continued following submission of the application in April 2021. A summary of consultation undertaken following submission is contained below.

Tours

- 4.39 A wide variety of stakeholders, residents, and local businesses were invited to attend a tour of the site in March 2022. Visitors were offered a tour around the vacant Selkirk House building and the West Central Street buildings by the applicant and project team. Tours took place on 7th, 9th, 10th and 23rd March.

In-Person Exhibitions

- 4.40 Public exhibitions have also been held on-site on Wednesday 6th April and Saturday 9th April 2022. In total 39 members of the public attended over two days.

Wider engagement

- **Website:** An updated consultation website was launched. It included detailed information on the revised scheme, including why changes had been made and inviting feedback on the submitted application.
 - **Flyers:** An A5 2-page flyer was sent out for door-to-door delivery to 2,668 local addresses around the site on Tuesday 15 March. The flyers explained that changes have been made to the proposals, and invited the public to visit the consultation website to find out more.
 - **Advertising:** Advertising took place in the press in March 2022 including adverts in the printed New Camden Journal and on the website.
- 4.41 A Webinar was held on 30th March via Zoom, attended by 7 members of the public.
- 4.42 In June 2022 BC Partners, with Simten as development managers, acquired the site from Labtech, the previous owners. Following this, the applicant undertook a further phase of stakeholder engagement.
- 4.43 This included meetings in August and September 2022 with Cllr Danny Beales, local ward councillors, the local Business Improvement District, as well as the Save Museum Street group.

Summary of Feedback

- 4.44 Feedback on the revised proposals has generally been mixed, with many of those who participated in the consultation still concerned about the height, massing and sustainability credentials of the revised scheme. Concerns still remain about the impact on key views of the new building, and that it could change the nature of the area and lead to more taller buildings coming forward.
- 4.45 The changes to the proposals, to reduce the height and provide more housing, have generally been welcomed, although concerns were expressed that the building was still too tall.
- 4.46 Many were also concerned about the environmental and carbon impact of the development.

- 4.47 A significant number of people who attended the consultation events and gave feedback were more positive about the proposals, accepting that the existing building is in a very poor condition and thought the new building would be an improvement.
- 4.48 Further detail relating to the public consultation can be found in the updated accompanying Statement of Community Engagement (July 2022) report submitted in support of this application. The applicant will continue to engage with stakeholders and neighbours following the submission of the amended application and keep them updated on the progress of the scheme. This engagement will include an update to the consultation website and letters to key stakeholders offering briefings with the project team.

5. PLANNING POLICY CONSIDERATIONS

Planning Policy Framework

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 This section of this Planning Statement provides an overview of the relevant planning policy in the development plan and other material considerations including national policy and supplementary planning guidance. The proposed development has been assessed in the context of this and other material considerations where appropriate.
- 5.3 The statutory development plan for the London Borough of Camden, and in turn the proposed development, consists of:
- The London Plan (2021); and
 - London Borough of Camden Local Plan (2017).
- 5.4 There are a number of other relevant adopted and emerging planning policy documents published nationally, regionally and by the Council that represent material considerations in determining this planning application, including:
- The National Planning Policy Framework (NPPF);
 - The National Planning Policy Guidance (NPPG);
 - London Borough of Camden Supplementary Planning Guidance;
 - London Borough of Camden Draft Holborn Vision and Strategy (2019); and
 - London Borough of Camden Draft Site Allocations Plan (2020).
- 5.5 The site is subject to the following site-specific planning policy designations as identified by the Council's adopted Policies Map:
- Tottenham Court Road Growth Area;

- Tottenham Court Road Opportunity Area;
- Central Activities Zone ('CAZ')

5.6 The site is identified as a development site within the Council's Draft Site Allocations Plan (2020) under Policy HCG3 ('1 Museum Street'). The draft allocation supports the comprehensive redevelopment of the site with a mix of commercial and residential uses, emphasising the requirement for enhancing the public realm, permeability through the site and ground level experience.

5.7 The West Central Street component of the site falls within the Bloomsbury Conservation Area. There are no listed buildings on the site, however, Grade II listed buildings adjoin the site boundary at 43-45 New Oxford Street and 16 West Central Street. No. 33-41 New Oxford Street, 10-12 Museum Street and 16A-18 West Central Street are each identified as 'positive contributors' in the Conservation Area Appraisal. The shopfronts at numbers 10 and 11 Museum Street are identified separately as positive contributors to the Conservation Area. Selkirk House sits outside of the Conservation Area boundary which runs along West Central Street.

5.8 The site is identified within the emerging Holborn Vision and Urban Strategy (2019) as a 'Key Project' for potential redevelopment. The guidance within this document supports active frontages at ground level, increased residential population, and a through route on an axis with Coptic Street with future potential to connect to Covent Garden.

5.9 An assessment of the key planning issues in relation to the proposed development against the relevant adopted planning policies is set out below.

Principle of Redevelopment

5.10 London Plan (2021) Policy D3 notes that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring the development is of the most appropriate form and land use for the site. The policy notes that higher density developments should be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Where these location have existing areas of high density building, expansion of the areas should be positively considered by the Borough.

5.11 The London Plan notes that the redevelopment of sites should minimise the use of new materials and follow circular economy principles. It is noted that large-scale developments in particular present opportunities for innovative building design that avoids waste, supports high recycling rates and helps London transition to a circular economy, where materials, products and assets are kept at their

highest value for as long as possible. The London Plan provides a hierarchy for building approaches, with diminishing returns released moving through refurbishment and re-use through to the recycling of materials produced by the building or demolition process.

- 5.12 The Council's Local Plan (2017) seeks to deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden. The Council will achieve this by supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.
- 5.13 The Council's draft Site Allocations Local Plan (2020) reiterates the Local Plan with specific regard to the Holborn area and highlights the site as being appropriate for a replacement building, subject to the replacement being of a height and massing that can successfully integrate with the surrounding townscape.
- 5.14 The Council's draft Holborn Vision and Urban Strategy (2018) specifically encourages the redevelopment of the site 'in a manner that makes the maximum possible contribution to delivering the vision and objectives for Holborn', specifically in terms of the introduction of ground floor uses, the provision of a through route and the buildings contributions to wider public realm enhancements.
- 5.15 The redevelopment of the site will allow for the replacement of an outdated and poorly designed tall building, with a comprehensive redevelopment of the site with high – quality and innovative architecture. The proposals seek to optimise this brownfield site, in an area well connected by public transport and in close proximity to jobs, services and infrastructure. The proposals will vastly improve the surrounding townscape and further improve views in and out of the surrounding Conservation Area and to longer strategic views across London. The redevelopment will also allow for the provision of up to date and high-quality commercial and retail floorspace, combined with the provision of homes, including affordable homes.
- 5.16 As part of the redevelopment, the replacement of the existing building will allow for enhanced energy performance on the site, whilst the loss of the existing NCP car park (supported by the Council's Local Plan Policy T2) will greatly encourage more sustainable forms of transport to and from the site. The redevelopment will also allow for improved public realm surrounding the site and, fundamentally, provide the opportunity to incorporate a new pedestrian route through the site to enhance connectivity in the area.
- 5.17 In order to achieve this, the proposed development seeks the substantial demolition of a number of buildings on site, specifically:
- Selkirk House, including the existing NCP car park;

- 16a – 18 West Central Street

Selkirk House

- 5.18 Detailed consideration has been given to the retention of the existing buildings upon the site, particularly that of Selkirk House. An extensive study was undertaken at the onset of the project into the viability of the existing tower. This exercise highlighted a number of initial baseline issues, notably:
- The column grid of the existing tower is extremely dense and as such, they are ‘transferred’ out by introducing a much thicker slab at fourth floor level in order to keep spans clear enough for vehicle movements in the NCP car park below.
 - Elements of the structure are required in any event to maintain stability of the building.
 - The site sits above the Post Tunnels below, which complicates the construction process as no part of the site can be ‘unloaded’ too quickly without damaging the tunnel walls.
- 5.19 The result of these findings has led to inherent restrictions in terms of reuse of the existing building. Notably at ground floor level the existing ramped slabs located within the car park would need to be demolished due to their impracticality for any other use, whilst a small section of the existing hotel would need to be demolished in which to replace with lighter steels construction in which to protect the existing Post Tunnels below. The retention of certain walls to support the tower were found to significantly limit the ability to activate the ground floor of the building along both Museum Street and proposed passageway, whilst the existing south and north cores were deemed to fail modern safety standards with regards to the required occupancies on site.
- 5.20 Due to the substantial depth of the transfer structure, the below tower levels would only be able to meet modern ceiling height standards across three floors. The role of these floors in maintaining stability of the building would also limit the number of penetrations and thereby service locations, leading to a highly visible plant room at upper levels.
- 5.21 Typical tower floors were found to be very dense and would significantly limit the attractiveness of the building on the commercial market. Furthermore, the retention of existing cores would lead to significant stretches of blank façade along the northern elevation of the building.
- 5.22 The top two storeys demonstrated additional challenges, with both floors 15 and 16 formed from shear wall construction and staggered between levels creating non-stack scenarios. As such it was deemed there was no practical way to reuse these floors in an open floor plan arrangement and in any event, would be proposed for demolition.

5.23 As a result of this analysis and clear restrictions, it was deemed that a total redevelopment of this part of the site is necessary to achieve a development which meets wider aspirations for this unique and important site and reach the sustainability targets contained within London Plan (2021) policy.

16a – 18 West Central Street

5.24 Detailed design studies were undertaken with regards to the retention, refurbishment and extension of 16a – 18 West Central Street. Analysis of the existing building found that the existing scale and massing of the building compromised the corner position of the site due to additional height found at 45 New Oxford Street and that the existing building parted from the clear rhythm of the buildings found in this location. As a result, the retention of this building would fail to rectify these design concerns and would not create a strong corner building.

5.25 A review of extending the existing building was undertaken, however this exercise confirmed that any extension proposals would lead to a poorly designed building which would appear top heavy over the existing building frame. Based upon this design exercise, it was concluded that the redevelopment of the site would provide significant opportunities to create a strong corner building, which more appropriately balanced the existing building at 45 New Oxford Street whilst also allowing for the modernisation of this corner site.

5.26 In addition to the townscape enhancements a review into the level of internal alteration required to provide high-quality residential units within the existing building was undertaken. This exercise concluded that the existing building design would severely limit the ability to provide acceptable levels of residential accommodation whereas the redevelopment of the site allows for a better mix of residential accommodation and provide enhanced aspect, outlook and daylight and sunlight to the proposed residential units.

5.27 Further information regarding this exercise can be found within the accompanying Design and Access Statement.

5.28 In reaching this conclusion the project team have also been mindful of London Plan (2021) Policy S17 in terms of circular economy requirements and a Circular Economy Statement accompanies this planning application and is summarised later in this Planning Statement.

5.29 It is therefore regarded, in the context of the London Plan and LB Camden Local Plan policy, that the redevelopment of the site would contribute significantly more to the strategic aims for LB Camden and provide far wider public benefits than complete retention of the existing structure.

A Mixed-Use Approach

5.30 The LB Camden Local Plan seeks a mix of uses within the Borough by which to achieve their strategic aims, particularly in the most accessible parts of the Borough, including an element of self-contained housing where possible.

5.31 Specifically, the site sits within the Tottenham Court Road Growth Area which has been designated to contribute to the Council's wider vision and objectives for this part of the borough, including:

- A balanced mix of uses, including housing and affordable housing, significant provision of offices and other employment opportunities, community facilities and retail;
- The provision of improved public realm, with a network of safe and attractive places and routes for pedestrians and cyclists, complimenting the growth area initiatives for Holborn and the West End Project;
- The maximisation of densities compatible with local context, sustainable design principles and public transport capacity;
- Development of the highest quality which preserves local amenity and seeks to enhance and conserve the significance of heritage assets; and
- Remedying the lack of open space in the area through provision on-site or contributions to assist in the provision of new spaces.

5.32 LB Camden have also held a public consultation on the draft Holborn Vision and Urban Strategy. The Vision specifically encourages the redevelopment of the Selkirk House in a manner which makes the maximum possible contribution to delivering the vision and objectives for Holborn which can be summarised as follows:

- Create a genuinely mixed-use place and enhance the vibrancy and diversity of the area by promoting cultural activity and uses to allow the area to be used at all times of the day;
- Create a place where businesses and institutions want to locate;
- Deliver the maximum viable amount of housing with a significant proportion of affordable housing;

- Balance the needs of the visitor economy without compromising other priority uses for the area; and
- Redevelopment including retail, offices and permanent self-contained (Class C3) residential accommodation at upper floors.

5.33 The proposal puts forward an office-led development with new retail, leisure and employment offering. This is in addition to the provision of housing, including affordable housing. The proposals therefore look to provide a mixed-use offering in line with Local Plan policy for this area of the borough.

5.34 Where an increase in commercial floorspace over 200sqm is proposed, Local Plan (2017) Policy H2 requires that 50% of the additional floorspace should be provided as housing. The following table provides a consolidated breakdown of the existing and proposed floorspace areas across all components of the site.

Table 5.1 Consolidated Floorspace Figures (GIA)

Use Class	Existing Sqm (GIA)	Proposed Sqm (GIA)	Variance Sqm (GIA)
Office (Class E)	624	22,650	+22,026
Hotel (C1)	9,292	-	-9,292
Car Park	8,037		-8,037
Hot Food Take Away (Sui Generis/former A5)	190		-190
Flexible Ground Floor Uses (Use Class E excluding part E(g) use)	502	1,361	+ 1,045
Flexible Ground Floor Uses (unrestricted Use Class E)		186	

Nightclub (Sui Generis)	994	-	- 994
HMO (C4)	97	-	- 97
Residential (Market)	1,817*	2,680	+863
Residential (LCR)		1,052	+1,052
Residential (Inter.)		770	+ 770
Total	21,553	28,699	+ 7,146

*Including former residential floorspace within Selkirk House

Table 5.2 Consolidated Commercial and Residential Floorspace Figures (GIA)

	Commercial	HMO	Residential (Private and Affordable)	Total Increase
Existing	19,639	97	1,817	21,553
Proposed	24,197	-97	4,502	28,602
Total	+ 4,558	-97	+ 2,685	+ 7,146

5.35 The proposed development delivers **7,146 sqm (GIA)** of additional floorspace. This generates a requirement of **3,573 sqm (GIA)** of residential floorspace, of which **1,787 sqm (GIA)** should be affordable to achieve the Council's 50% target, or **1,251 sqm (GIA)** to achieve the 35% GLA 'Fast Track' target.

5.36 The proposals will deliver **2,685 sqm (GIA)** of additional residential floorspace. It is acknowledged that this is a shortfall of **888 sqm (GIA)** of market residential floorspace when assessed against Policy H2, however, 51% of the required housing uplift is provided as affordable, equating to **18** new affordable housing units (1,822 sqm),

5.37 Historically residential accommodated was provided across the 14th and 15th floors of Selkirk House in the form of 11 duplex units, totalling 1,332 sqm (GIA) of floorspace. Following the implementation

of the planning permission PSX0204780 (granted in April 2005) the 11 duplex units have been used as serviced apartments (Use Class C1) and the residential use at the site has ceased. Whilst this historic change from residential duplexes to serviced apartments results in the lawful use of this floorspace now being within Use Class C1 it is acknowledged that the original change from market housing to serviced apartments was unauthorised. As such this lost market housing floorspace has been reprovided within the Vine Lane block in place of the co-working space previously proposed.

- 5.38 In regards to the loss of the previous hotel use Policy E3 states the Council will protect existing visitor accommodation in 'appropriate locations', rather than a blanket protection across the borough as a whole. Therefore, other factors such as the supply and demand of visitor accommodation is of importance to the consideration of the level of protection required.
- 5.39 Selkirk House was previously occupied by the former Travelodge hotel, as well as the existing NCP car park. The former Travelodge contained 184 bedrooms and provided overspill accommodation from the primary Travelodge hotel building on Drury Lane, situated on the opposite side of High Holborn.
- 5.40 Whilst the site may be situated in a popular location for hotel uses more generally, the overspill hotel was surplus to requirements for Travelodge and would have required significant investment and refurbishment works in order to bring the building up to Travelodge's required standard of quality for customers. The overspill facility ceased all operation in June 2020 and the floorspace has since remained vacant.
- 5.41 Travelodge has over 580 hotels and more than 40,000 guest bedrooms across the UK, Ireland and Spain. The majority of Travelodge hotels (80%) are within the centre of major towns and cities, as well as popular holiday destinations. Travelodge is continuing to expand, in appropriate locations which are considered to be suitable and viable. The Travelodge group aims to become the favourite hotel for value, offering good quality but low-cost rooms for leisure and business travel. The company recently spent £100 million on the modernisation of more than 30,000 rooms in locations where it was viable to do so. Whilst the site is located in an area suitable for hotels, the overspill facility was no longer suitable for Travelodge, particularly as it did not benefit from sufficient upgrades and refurbishment works required in order for it to remain attractive to the Travelodge customer base.
- 5.42 A Hotel Needs Assessment, prepared by Icen Projects, accompanies this planning application and demonstrates that:
- The former Travelodge overspill hotel vacated the site in June 2020. As the site is currently vacant, there will be no 'actual' loss of visitor accommodation at the site. Whilst the site may generally be an appropriate location for hotel uses, the overspill hotel was surplus to requirements for Travelodge. The Travelodge brand will continue to have presence within

the Local Impact Area (with the hotel on Drury Lane to be retained). The 'right-sizing' of the hotel and reduction in hotel beds will allow it to be stronger in the market.

- Camden has a strong supply of serviced visitor accommodation. At December 2015 there were 18,038 bedrooms, equating to a 12.4% share of the total rooms within London; the second highest number of visitor accommodation bedrooms after Westminster.
- There is a strong pipeline of visitor accommodation across Greater London and more importantly, within Camden and Westminster and specifically the Holborn and Covent Garden Ward. The Local Impact Area will benefit from a number of additional bedrooms if the committed schemes are built out – significantly more than the number of bedrooms which are being lost as a result of the proposed development. Camden has a future pipeline of 1,119 hotel bed spaces.
- The projected demand in Camden between 2015-2041 is only 1,595, equating to just 2.7% of the gross room demand across London. This is significantly less than many other boroughs such as Westminster (9.7%) and Tower Hamlets (8.9%). Furthermore, the hotel market has been significantly impacted due to the Covid-19 pandemic, further reducing demand in the short-term and potentially the longer-term. The existing pipeline is already close to meeting the projected demand of 1,595 bed spaces.

5.43 Whilst the proposed development will result in the loss of hotel bed spaces (albeit important to note that the hotel is no longer actually operating and therefore there will be no 'actual' loss), it is important that this is balanced with the significant number of other benefits that the scheme brings as per both London Plan Policy E3 and Local Plan policy.

5.44 The accompanying Hotel Needs Assessment concludes that the resultant impact on the local hotel market due to the loss of bed spaces at the site (and on the specific type of hotel market that the former Travelodge sits within) will be minimal. Furthermore, it is important to note that the former hotel at the site is no longer operating. It has ceased all operation and therefore the hotel is vacant – there is no future demand from Travelodge to re-open the hotel at the site, or from any other hotel operator. Because of this, there will be no 'actual' loss of visitor accommodation at the site as it currently no longer operating.

5.45 As such it is considered that the proposed development accords with Policy E3 of the Camden Local Plan. The former Travelodge hotel was surplus to requirements and the building is no longer an appropriate location for visitor accommodation. The loss of the vacant hotel will not have a detrimental impact on the Local Impact Area, Camden, or to Greater London. London Plan

Commercial provision

- 5.46 London Plan (2021) Policy SD4 highlights the role the CAZ plays in providing a rich mix of strategic function and local uses and that this should be promoted and enhanced. The London Plan acknowledges the nationally and internationally significant role office functions play within the CAZ and seeks to support the intensification and provision of sufficient office space within the area. Policy SD5 builds upon this, noting that offices and other CAZ strategic functions such as leisure and retail are to be given greater weight relative to new residential development within the CAZ.
- 5.47 LB Camden Local Plan Policy E1 supports and encourages economic growth within the borough. Growth Areas are considered to be an appropriate location for the provision of new office development in order to meet demand. Local Plan Policy supports the intensification of employment sites and premises where the level of employment is increased or maintained, and, where possible, the redevelopment retains existing businesses on site. The Council also identifies Growth Areas as locations for new shopping and related uses. Local Plan Policy TC1 outlines that additional retail provision will be accepted in the Tottenham Court Road Growth Area as part of redevelopment schemes. Local Plan Policy context is therefore strongly supportive of the provision of further commercial and retail space in this location.
- 5.48 The proposed development seeks to replace a vacant hotel and large NCP multi storey car park with a bespoke office-led development with vibrant associated ancillary uses at ground level that will be suitable for small businesses and accessible to the local community.
- 5.49 Across the ground floor of the proposed development a range of flexible town centre uses will be provided. This provision will focus on small retail, food, beverage and other uses which will activate all frontages of the proposed development, replacing the dead frontages currently dictated by the NCP car park. The provision of active uses across the site that are suitable for small occupiers is a key aspiration within the Holborn Vision and Urban Strategy (2019), and this will have a positive impact on the lives of local residents, workers and visitors - supporting the day and night-time economy.
- 5.50 The table below provides a summary of the existing and proposed commercial floorspace provision.

Use Class	Existing Sqm (GIA)	Proposed Sqm (GIA)	Variance Sqm (GIA)
Office (Class E)	624	22,650	+22,026
Hotel (C1)	9,292	-	-9,292

Car Park	8,037		-8,037
Hot Food Take Away (Sui Generis/former A5)	190		-190
Flexible Ground Floor Uses (Use Class E excluding part E(g) use)	502	1,361	+ 1,045
Flexible Ground Floor Uses (unrestricted Use Class E)		186	
Nightclub (Sui Generis)	994	-	- 994

5.51 The proposed development therefore provides an uplift in commercial floorspace on the site by **4,558 sqm (GIA)**. This uplift is primarily provided through the addition of office floorspace.

5.52 A Socio-Economic Assessment, prepared by Icen Projects, accompanies the planning application and provides an analysis of the demand for commercial floorspace within the area and benefits arising from the proposed scheme. The Assessment highlights that opportunities for large office provision were identified specifically within the designated Tottenham Court Road Growth Area and that economic activity and industry indicates a local economy that is performing better in comparison to London as a whole.

5.53 At present, the site supports no existing employment. The precise number of jobs arising from the proposed development will depend on the final mix of uses and the end-users that occupy the scheme. However, it is possible to estimate employment generation by applying average employment densities to the proposed commercial floorspace. On this basis, the scheme is expected to provide **1,644 jobs** across the office provision and **91-121 jobs** across the retail provision. On this basis, the on-site net employment impact of the Proposed Development will amount in an uplift of between **1,735-1,765 direct FTE jobs**. It could reasonably be expected that the new jobs created will primarily fall within the retail and office/professional services. This sector mix would support jobs at a range of skill levels to provide employment opportunities for local and London residents and help to diversify the local economy.

- 5.54 The HCA Additionality Guide recommends a range of composite multiplier effects by property related activity including B1 office and retailing. Given that the majority of the commercial floorspace relates to B1 activities, a local multiplier of 1.29 has been applied to calculate the indirect employment generation. In this context, it is estimated that the **1,735-1,765** additional jobs created across the Application Site could support **up to a further 511 jobs** in local shops, services and other businesses (across LB Camden).
- 5.55 The proposed development will therefore achieve London Plan and Local Plan aims with regards to the delivery of commercial floorspace within the CAZ and deliver a wide range of benefits to the area including to achieving the economic objectives in place locally and regionally.
- 5.56 This part of the Planning Statement should be read in conjunction with the accompanying Socio-Economics Assessment prepared by Icen Projects. This Statement considers the Council's employment land position in more detail and details the wide range of economic benefits that the proposed development will deliver.

Residential provision

Principle of housing provision

- 5.57 The NPPF (2021) seeks to significantly boost the supply of housing. The NPPF is clear in stating that more effective use of land should be taken where sites are well located to good transport links and where there is an existing or anticipated shortage of land for meeting identified housing needs. There is a clear message throughout the NPPF to make more land available for housing and the document highlights the need for a flexible approach to be taken to reflect such changes in the demand for land.
- 5.58 It has been identified at all levels and particularly in the South East and London, that the provision of housing must be a priority to overcome the current shortage of accommodation. London Plan (2021) Good Growth principle GG4 identifies an underlying principle to encourage additional housing at appropriate locations and to reuse brownfield sites to deliver homes.
- 5.59 LB Camden Local Plan Policy H1 seeks to maximise housing supply in the Borough and aims to exceed a target of 16,8000 additional homes from 2016/17 – 2030/31 including 11,130 additional self-contained homes. The Policy notes that the Council will seek to exceed the target for additional homes by regarding self-contained housing as the priority land-use of the Local Plan where sites are underused and expect the maximum reasonable provision of housing that is compatible with any other uses needed on the site.

5.60 Local Plan Policy H7 notes that the Council takes a flexible approach to assessing the mix of dwelling sizes proposed in each development, having regard to any evidence of local need, the character of the development, the site and the area, including the impact of the mix on child density.

5.61 LB Camden Policy H4 seeks to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,300 additional affordable homes from 2016/17-2030/31 and aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing. The policy sets an affordable housing target of 50% for all developments with the capacity for 25 or more additional dwellings. The guidelines mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing. The text to accompany this policy does note however that these guidelines will be applied flexibly.

5.62 The proposed development seeks to deliver 48 residential units across the site, including 18 affordable housing units. This is to be provided across the following tenure and housing mix:

	Low Cost Rent	Intermediate	Private	Total
1 bedroom		4	24	28
2 bedrooms	4	5	5	14
3 bedrooms	4		1	5
5 bedrooms	1			1
Total	9	9	30	48

5.63 The proposed development therefore provides a varied residential offering in terms of unit size, including a number of family-sized dwellings within this urban location.

5.64 A total of **4,502 sqm (GIA)**, equating to **48** residential units, are proposed within the West Central Street, Vine Lane and High Holborn Buildings. This represents an uplift of **2,588 sqm (GIA)** when compared with the existing residential floorspace falling within Class C3 on site, taking into account the re-provision of the historically lost residential floorspace at the upper levels of Selkirk House. Within this, **51%** of the affordable housing requirement (by floorspace) is being provided.

- 5.65 The affordable residential accommodation will be located in the West Central Street Building, totalling 18 units on site, delivered as a mix of both Social Affordable and Intermediate Rented, in line with Camden's policy requirements.
- 5.66 The provision of 18 units will be provided on the basis of a split between Low Cost Rent and Intermediate tenures at a 58/42 percent split. The offer therefore broadly meets policy requirements of 60% Social Affordable and 40% Intermediate.
- 5.67 A Financial Viability Assessment (FVA) has been undertaken and submitted in support of this application. The FVA concludes that, as with the previous scheme, the proposed offering would achieve a return which is below benchmark return level. The report therefore concludes that the proposed planning contribution package comprising 51% affordable housing (by GIA) plus S106 and CIL of c. £4.3 million represents the maximum reasonable level that can be anticipated by the Council and any further contributions, including a residential PIL, cannot be justified based upon viability.

Design

- 5.68 High quality sustainable design is engrained in policy at all levels including the NPPF and the Council's adopted and emerging planning policy.
- 5.69 Section 12 of the NPPF (2021) attaches great importance to the design of the built environment, stating 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.
- 5.70 The London Plan (2021) seeks to create successful, sustainable mixed-use places that make the best use of land. To achieve that, Policy GG2 of the Plan seeks a design-led approach for development to determine the optimum development capacity of sites taking into account site context and capacity for growth. The Plan proactively seeks development to explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The London Plan (2021) Policy D3 highlights that developments which show a clear understanding of, and relationship with the distinctive features of a place are more likely to be successful.
- 5.71 At a local level, Local Plan Policies D1 and D2 set out the borough's aspirations for the promotion of high-quality places and conserving heritage, going on to state that the Council will ensure that Camden's places and buildings are attractive, safe and easy to use by preserving and enhancing Camden's rich and diverse heritage assets and their settings. The aim of Local Plan Policy D1 is to require all developments, including alterations to existing buildings or replacement buildings, to be

of the highest standard of design. They are also required to make a contribution to pedestrian permeability and improved public accessibility.

5.72 The existing site is made up of two distinct blocks, the existing Selkirk House and NCP car park, and the buildings which form the West Central Street (WCS) block. Selkirk House sits to the northern part of the site, which is acknowledged as being run-down as an area. The tower itself is of poor quality and is regarded as having an undifferentiated form, whilst the existing car park blocks movement through the site. A Townscape and Visual Impact Assessment accompanies this planning application and describes Selkirk House as offering 'little that is positive to the local townscape and views' and that it is 'a disappointing piece of urban fabric given its central London location'. The West Central Street block, which includes buildings on New Oxford Street, Museum Street and West Central Street is regarded as having a greater contribution to the local streetscape, aided by facades which date back to the 19th century, however the accompanying TVIA notes that many of these buildings are currently in a very poor state.

5.73 The existing buildings within the site therefore provide significant opportunities to sensitively enhance and optimise the built form in this central London location. The proposed development has been modelled through careful studies in order to respond to the townscape and unique setting of the site. Particular regard was given to the importance of surrounding conservation area, adjacent building and views of the proposed development from key locations surrounding the site. Detailed workshops with the Council, in addition to two Design Review Panels has aided the evolution of the design of the proposals which form this planning application. These proposals are summarised below.

- **Wider masterplan and public realm** - including the provision of new pedestrian route north to south through the site.
- **Museum Street** - a single new building rising to 19 storeys, providing office (Class E(g)(i)) accommodation on upper levels and a range of flexible town centre uses (Class E) at ground level.
- **High Holborn** - a single new building rising to 6 storeys, providing residential (Class C3) accommodation on upper levels and a flexible town centre use (Class E) at ground level.
- **Vine Lane** - a single new building rising to 5 storeys, providing market residential units with a flexible town centre use (Class E) at ground level.
- **West Central Street** - a series of new and refurbished buildings rising to 6 storeys, providing residential accommodation (market, LCR and Intermediate) on upper levels (Class C3) and flexible town centre uses (Class E) at ground level.

- 5.74 The supporting Design and Access Statement prepared by DSDHA provides a full explanation and assessment of the design of the proposed development and how it has evolved through pre-application discussions in response to Officer comments, whilst full justification for the proposed development in townscape terms is provided in the accompanying Townscape and Visual Impact Assessment prepared by The Townscape Consultancy. Both documents should be read in conjunction with this section of the Planning Statement.

Wider Masterplan and Public Realm

- 5.75 The masterplan for the site has been developed around a focus on optimising public realm and landscape enhancements and increasing connectivity in the area.
- 5.76 The scheme has sought to concentrate massing toward the centre and south of the site to ensure that the increase in massing corresponds to the larger buildings to the immediate east and south of the site and with the existing building heights experienced around Tottenham Court Road. Existing building lines within the site have been set back to create larger public spaces around the site and to provide an enhanced public realm and wider landscaping benefits.
- 5.77 The proposals look to reintroduce a north-south pedestrian passageway, aligning with 18th century plans, to re-provide a connection through the site. This will enhance the permeability in the local and wider area and allow the site to connect to Bloomsbury and the British Museum to the north and Covent Garden to the south, in line with Council strategic aims for the area and Local Plan Policy D1. The introduction of this passageway also allows for the scheme to maximise ground floor uses and wider street level activation through the dissecting of the site. These enhancements will be particularly felt along West Central Street which is currently occupied by run-down and inactive frontages with no natural surveillance.

1 Museum Street

- 5.78 The demolition and replacement of Selkirk House forms the key component of the overall masterplan. The proposals seek to replace the existing, low-quality hotel building with an office-led development of ground plus 18 storeys above ground.
- 5.79 London Plan (2021) Policy D9 provides guidance in terms of the acceptability of tall buildings. The policy notes that Boroughs should determine where there are locations appropriate for tall buildings and what should be taken into account: visual impacts; whether they reinforce the spatial hierarchy of the local and wider context; architectural quality of the buildings; and impact on wider heritage assets. With regards to the functional impact of tall buildings, proposals should address the impact in terms of capacity, both in terms of transport networks and public realm, and that design should take into account the economic and regeneration potential arising from the scheme. In terms of environmental impacts, any scheme should acknowledge wind, daylight and sunlight penetration and air movement.

- 5.80 A tall building of 17-storeys already exists on site. As such, the principle of a tall building in this location has already been established. The proposed development seeks to balance against opportunities to optimise the site and provide an increase in commercial floorspace whilst also providing a building of high-quality architecture and associated enhanced public realm. In order to achieve this, the proposed development seeks an increase in height on the site, but a reduction of building footprint in which to open up the public realm at ground floor level.
- 5.81 Whilst taller than the existing Selkirk House, the massing has been designed to step down toward the existing lower scale buildings to the north and effectively appear broken up. The proposal would therefore mediate between the existing lower-rise buildings to the north and the tallest element within the proposal and reinforce the spatial hierarchy of the local and wider context. The proposed steps would allow a slimmer profile to the building at its tallest point, but also provides the opportunity to introduce terraces on the stepped levels to provide amenity space for the tenants of the office building.
- 5.82 The tower is of a design in which softens the building form and references existing surrounding architecture. In terms of materiality, the main cladding is proposed as a light bronze anodised aluminium which takes particular note of the bronze hue's found in nearby buildings such as those along the neighbouring Grape Street.
- 5.83 The accompanying TVIA seeks to assess the proposed buildings impact upon surrounding long and short views. This assessment concludes that the proposed development would 'enhance short, medium and longer-range views in the local and wider area around the site, through high quality architecture of all its component parts'. The TVIA notes that this is done 'through the visually interesting stepped form of the proposed tower, the manner in which this helps to mediate its scale and the ordered articulated nature of its elevations'. The assessment highlights that the building would sit comfortably within the local area, particularly in the context of existing buildings such as Centre Point and Central St. Giles, and that in lower range views, whilst technically visible, it would have no perceptible effect on important views such as that of the Palace of Westminster.
- 5.84 The proposed development also seeks to activate the ground floor level through the addition of commercial units, designed in a way to provide a human scale to the development from street level. The reduction in building footprint will also allow the development to maximise the ground floor public realm and open space, particularly along the Museum Street elevation. The accompanying TVIA notes that the combination of both design elements will significantly enhance the public experience of the site.
- 5.85 Assessment in terms of the economic enhancements arising from the proposed tall building, in addition to its implications in terms of daylight, sunlight and wind can be found later in this statement and within the relevant supporting technical documents.

- 5.86 The proposed development at 1 Museum Street will therefore constitute a substantial improvement on the existing situation, introducing new high-quality architecture to the site and local area and would enhance the public realm whilst also optimising the use of the site.

High Holborn Block

- 5.87 The High Holborn block occupies the south-east corner of the proposed Grape Street cluster with a frontage on to both High Holborn and Vine Lane. The footprint of the building infills the part of the site left from the proposed demolition of Selkirk House and the introduction of a new pedestrian route.
- 5.88 The proposals provide a 6-storey building, with part set back top floor, which rises toward Museum Street and Vine Lane. The block is proposed for residential use, with one bedroom units at lower floor levels, and a 3 bedroom unit arranged over the fourth and fifth floors.
- 5.89 The proposed design is of a comparable scale to the adjacent buildings along High Holborn and the proposed development seeks to reference the surrounding character, albeit in a modern way. The design of the building seeks to highlight the entrance to Vine Lane, through increased massing at the pedestrian entrance. This additional massing also aids integrating to 1 Museum Street and the stepped down approach of the taller building toward street level.
- 5.90 The proposed development is considered to provide a new building of high-quality design which is sensitive to the existing buildings adjacent, whilst also makes a contribution to pedestrian permeability and legibility within the area, in line with Local Plan Policy D1.

Vine Lane

- 5.91 The proposed development seeks to repair the urban block along the proposed Vine Street, working with the proposed High Holborn building to infill the site and provide a continuous street elevation along both West Central Street and the new proposed pedestrian route. The scheme proposes a 5-storey development, with flexible town centre units at ground floor level and 4 storeys of residential floorspace above.
- 5.92 The proposed building looks to echo the scale of buildings immediately around the block, specifically those of the neighbouring listed Grape Street buildings. The proposed development seeks to incorporate a top floor terrace located toward the West Central Street elevation in which to provide amenity space for occupiers of the residential units within the block, in addition to the provision of a courtyard space to provide adequate daylight and sunlight levels into the building and separation from existing dwellings located on Grape Street.
- 5.93 In review of the proposed Vine Street development, the accompanying TVIA confirms that the proposals seek to incorporate a sensitively designed building which acknowledges adjacent building heights and massing whilst infilling a gap along the proposed pedestrian route in which to provide a

continuous active frontage. The TVIA therefore concludes that the proposed development would be of an appropriate massing and scale and designed in a way which replicates the architectural approach of the nearby historic buildings, albeit in a modern way.

West Central Street (WCS)

- 5.94 The West Central Street block is located to the north of the site and comprises a number of different buildings. The WCS buildings are acknowledged as positive contributors to the wider Bloomsbury Conservation Area, with the exception of a small portion of 18 WCS.
- 5.95 The proposals for the WCS block maximise the opportunity to provide residential accommodation within this part of the site, whilst also respecting the historic significance of the area and the role the buildings play in positively enhancing the conservation area. The existing buildings are in poor condition and in many cases the existing layouts and floor to ceiling heights limit the ability of these building to provide modern residential accommodation which meets prescribed residential standards. The scheme has sought to minimise demolition where possible, whilst also seeking to balance the need for alteration or replacement against the public benefits arising from the scheme.
- 5.96 The proposed development has also sought to provide variety in terms of building heights and architectural design to prevent repetitive design and to differentiate between the various blocks. The development at WCS also seeks to enhance the ground floor commercial units, refurbishing and reintroducing where appropriate.
- 5.97 The following provides a summary of proposed development to each of the WCS buildings.

10 – 12 Museum Street

- 5.98 The existing buildings at 10 – 12 Museum Street were built in the 1820's and are considered to be part of the original Pennethorne Masterplan. In review of the existing structure it was deemed that the internal configuration of this building and existing floor to ceiling heights would limit the residential provision to a 1 x 4 bedroom townhouse at 10 Museum Street, whilst any proposed units within 11-12 Museum Street would not meet space standards.
- 5.99 A review of the existing structure confirmed that additional height to the existing building could be historically appropriate in this location. Specifically, additional height would allow for this corner building to be strengthened within the streetscape and enhance legibility in the area.
- 5.100 The proposed development therefore seeks the addition of a single-storey roof extension to the block. While the hierarchy, materiality and proportions are derived from the host building, a deliberately modern approach to the extension is proposed so that it reads as part of the collection of newer buildings adjacent and allows for floor to ceiling heights that comply with standards.

- 5.101 The extension and internal reconfiguration of the building will allow for the building to be accessed via West Central Street which will provide a larger commercial unit at ground floor level, whilst upper floors will be able to accommodate 1 x 3 bedroom, family-sized residential units with ancillary private amenity space.
- 5.102 The proposed development therefore provides high quality residential accommodation whilst also responding to the character and form of the surrounding proposed new buildings and to the materiality, proportions and articulation of the historically significant host building.

35 – 37 New Oxford Street

- 5.103 The buildings at 35 – 37 New Oxford Street were built in the 1820's and are considered to be part of the original Pennethorne Masterplan. In review of the existing structure it was deemed that the internal configuration of this building and existing floor to ceiling heights would limit the residential provision to 2 x 3 bedroom townhouses which would require access directly from street level.
- 5.104 The existing building currently provides no attic story or extension, and as such the proposals seek to extend the original building to provide further floorspace. Given the historic significance of the façade, a traditional approach to the roof addition is proposed in the form of a traditional mansard, typical to the local landscape.
- 5.105 The extension of the existing building in addition to internal alterations allows for the provision of 1 x 2 bedroom units per floor, accessed via a lift. The proposed scheme would therefore provide step-free units and contribute to a more viable unit mix in this location. The proposals for this block also seek to repair the existing façade, to replace existing unmatched windows and to upgrade the existing shop fronts at ground floor level.
- 5.106 The proposed development would appropriately retain and repair these frontages while adding a roof extension of a modest scale which would sit well within the local townscape.

39 – 41 New Oxford Street

- 5.107 The existing buildings at 39 – 41 New Oxford Street were refaced in the 1920's but contribute to the wider conservation area through their pitched pediment. In review of the existing structure it was deemed that the internal configuration of this building and existing floor to ceiling heights would limit residential provision at top floor level to 1 x 2 bedroom residential unit of 50sqm.
- 5.108 On review of the current buildings, it was deemed that additional height would be appropriate, but that it should be set back to retain the prominence of the existing pitched pediment. On this basis,

the proposals seek a lightweight and set back single storey roof top addition with a fully glazed façade. Proposals also seek to repair and repaint the existing parapet and façade.

- 5.109 This lightweight approach seeks to minimise the visual impact of the proposal and refrain from detracting from the existing façade. The addition of the mansard will also allow for a much larger 1 x 2 bedroom unit to be provided which meets space standards and can also be accessed step free.

16A and 16B West Central Street

- 5.110 The buildings at 16A and 16B WCS were built in the late 19th century, but do not form part of Pennethorne masterplan. The historic significance of these buildings is drawn from their positive impact on the setting of the listed building at 45 New Oxford Street, but is regarded within the accompanying TVIA as providing minimal contribution to the conservation area as a building in their own right. As existing, greater height located in the middle of this block by 16B compromises 16A and its position as a corner building.
- 5.111 Proposals initially sought opportunities to extend the original block, however this was deemed to create a top-heavy building, particularly at 16A, and failed to provide ground floor activation, much needed at this part of the wider masterplan for the site. Furthermore, the development in this form would provide a limited number of compromised residential units, with poor amenity and lack of amenity space provision.
- 5.112 Based upon this analysis, the proposed development seeks a replacement building at 16A and 16B WCS. The proposed development rises to 6-storeys in height at 16A, to respond to its position as a corner building, whilst a set back top floor to 16B WCS is proposed to soften the buildings impact on the streetscape and to introduce a dynamic form to the skyline.
- 5.113 The redevelopment of the site also allows for the provision of a courtyard in the centre of the site which can be accessed by the residential occupiers of the WCS block. This courtyard will replicate the original plan for the site which was lost when 18 WCS was constructed.
- 5.114 The proposed development therefore seeks to replace the existing run-down buildings, with new buildings at a scale that would relate well to neighbouring historic buildings, would aid in forming a transition to the southern part of the site and provides high-quality residential accommodation with additional communal amenity space.

Summary

- 5.115 The proposals will redevelop an existing brownfield site which is current occupied by under-utilised, not fit for purpose, low grade buildings. The existing buildings do not optimise the development potential of the site, nor do they utilise this highly accessible location. The development therefore

presents an opportunity to significantly enhance the site and the contribution it makes to this part of Central London through the provision of high-quality contextual buildings, activation of streetscape, improvements to connectivity and enhancements to the wider public realm.

5.116 The supporting TVIHA concludes that the proposed development would be a high quality and would positively transform this Central London site. It will improve its immediate townscape and enhance the experience of pedestrians moving between Covent Garden and the British Museum, and would form a high-quality element in a range of views in line with national, regional and local planning policy.

Heritage and Townscape

5.117 Paragraph 190 of the NPPF states that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of the 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 economic vitality; and
- The desirability of new development making a positive contribution to local; character and distinctiveness.

5.118 Paragraph 202 of the NPPF states that where development will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal.

5.119 At regional planning level Policy HC1 of the London Plan (2021) states that development affecting heritage assets and their settings should conserve their significance by being sympathetic to the assets' significance and appreciation of their surroundings.

5.120 Local Plan Policy D1 requires any proposal to respect local context and character and preserve and enhance the historic environment and heritage assets in line with Local Plan Policy D2.

5.121 The West Central Street component of the Site falls within the Bloomsbury Conservation Area. There are no listed buildings on the Site. Grade II listed buildings adjoin the Site boundary at 43-45 New Oxford Street and 16 West Central Street. No. 33-41 New Oxford Street, 10-12 Museum Street and 16A-18 West Central Street are each identified as 'positive contributors' in the Conservation Area Appraisal. The shopfronts at numbers 10 and 11 Museum Street are identified separately as positive

contributors to the Conservation Area. Selkirk House sits outside the Conservation Area boundary which runs along West Central Street.

- 5.122 A full assessment of the impact of the proposed development on these heritage assets has been undertaken and details of the assessment are set out within the supporting Heritage Assessment and Townscape and Visual Impact Assessment prepared by The Townscape Consultancy.
- 5.123 The northern part of the site lies within the Bloomsbury Conservation Area. The Assessment notes that of the buildings within this part of the site, the greatest contribution to the significance of the Conservation Area is made by the buildings on New Oxford Street and Museum Street which have facades dating to the period immediately following the laying out of the New Oxford Street in the 1840s. The buildings at West Central Street are an ad hoc mix of different buildings from different periods which have changed over time.
- 5.124 The reports note that the proposed development would constitute a substantial improvement on the existing situation on site by introducing high quality new architecture, whilst enhancements to the public realm would have a positive impact on a range of views and improve the pedestrian experience moving between Covent Garden and the British Museum.
- 5.125 The Assessment highlights that the architecture of the proposed development has been well considered and draws on an extensive study of local historic buildings. Whilst taller than the existing Selkirk House, the proposed tower design would break down the scale and assist in relating it to the nearby lower scale historic buildings. It will also and would be of much higher visual quality than the existing tower. The scale and massing of the other elements within the proposed development were also found to relate well to the immediate contexts which they address.
- 5.126 In respect of the direct effect of the proposed development on the Bloomsbury Conservation Area, it is considered to appropriately retain and repair those frontages which contribute the most to the Conservation Area. The extensions to the buildings which fall within the Conservation Area would be modest in scale and would preserve the character and appearance of the Conservation Area.
- 5.127 The Assessment does note that there would be minor negative effects arising from the demolition of the existing buildings at 16a and 16b West Central Street, but these would be balanced by the introduction of high quality replacement buildings, enhanced public realm and by the repair of the frontages of the New Oxford Street and Museum Street buildings. On balance, the Assessment considered that the Proposed Development would result in harm to the Conservation Area, but that this harm would be at the low end of 'less than substantial'.
- 5.128 In respect of other heritage assets, the Assessment notes that the proposed development would form a high-quality development, consistent with the existing character of the local and wider setting

in which the heritage assets are experienced. Where visible in views of those heritage assets, the proposed development would be seen to a generally limited extent, clearly distinct from the heritage asset in question, and with a stepped form and ordered elevations which relate well to nearby heritage assets. The proposed development would preserve the setting of these heritage assets, would leave their heritage significance unchanged, and would not affect the ability to appreciate their heritage significance.

- 5.129 The proposed development can therefore be regarded as giving new vibrancy to the site and to the surrounding conservation area. Where there are minor negative effects arising from proposed demolition, this should be balanced against the significant public benefits arising from the scheme as per paragraph 202 of the NPPF (2021). In this case, the proposed development should be balanced against the provision of a high-quality new development which clearly outweighs the less than substantial harm to the poor quality existing buildings. On this basis, the proposed scheme complies with relevant national and local policy and guidance for heritage assets.

Public Realm and Landscaping

- 5.130 The Council have strong aspirations to enhance the public realm and improve connectivity in the area surrounding the site. The Local Plan notes that improvements to the public realm within the Tottenham Court Road Growth Area is a high priority, with an improved network of safe and attractive places and routes for pedestrians and cyclists that successfully link to neighbouring areas (particularly the growth area at Holborn (see below), Covent Garden, Bloomsbury and Oxford Street) and reduce the dominance of traffic in the area, complementing the West End Project transport scheme. The draft Holborn Vision and Urban Strategy echoes these priorities and highlights the specific role the site can bring in achieving these aims.
- 5.131 As existing, the site is predominantly occupied by buildings and dominated by hard standing with a mix of mature trees. Through the delivery of a landscape and public realm masterplan the proposed development seeks to deliver a sensitive, green and high quality urban neighbourhood, whilst enhances the areas connectivity. The public realm element of the proposed development is intended to be the unifying element that binds the different buildings and uses whilst providing wider enhancements to the surrounding area.
- 5.132 The site sits amongst a variety of proposed public realm enhancements, most notably those proposed as part of the West End Project. In order to provide a consistent public realm throughout the area, the proposals tie in with the adjacent public realm works to Princes Circus with a focus on providing a woodland character and an oasis of green for people and wildlife.
- 5.133 The proposed development provides an indicative variety of public realm and landscaping enhancements which can be summarised as follows:
-

- Creation of a new pedestrian-friendly route for a direct north-south pedestrian connection which links New Oxford Street and High-Holborn known as Vine Lane.
- Creation of a pedestrian priority island between New Oxford Street and High Holborn while creating a continuous space between Museum Street and Princes Circus
- The set back of building boundaries to Museum Street to provide more generous public space along this route, including planted and seating areas which ties into the proposed green space at Princes Circus and road closure of Shaftesbury Avenue.
- Provide green spaces at podium level in the West Central Street inner courtyard and a 'pocket' green space along the proposed new route, Vine Lane.
- Retention where possible and replacement of trees including informal clusters of existing London Planes along Museum Street and two additional trees along High Holborn and West Central Street.
- To convert West Central Street to a pedestrian and cycle priority access zone.
- The re-paving of High-Holborn to tie in with highways works to the west of the site.
- The restriction of main servicing provision to be concentrated on High Holborn through the use of a vehicular lift down to basement level in order to retain active frontages at ground floor level and for vehicular serving movements to be kept away from the new public realm provision.
- Wider improvements to the pedestrian experience by maximising high-quality soft landscape planting area with seating where possible including the planting of habitat throughout the scheme to enhance the ecology value of the site.

5.134 The proposed development has sought to improve biodiversity at the site as well as integration with the wider public realm improvements delivered by the West End Project. The proposed development will also involve the creation of a new public route through and across the site for cyclists and pedestrians which will connect to and enhance the wider movement network, including connections to Tottenham Court Road and the British Museum.

5.135 The design rationale for the approach to public realm and landscaping is detailed in the accompanying Design and Access Statement prepared by DSDHA.

Residential Quality

- 5.136 LB Camden Local Plan Policy H6 notes that the Council expects all self-contained homes to meet the national described space standards and provide accessible homes.
- 5.137 The size of the homes within the proposed development comply or exceed the relevant space standards as set out in the nationally described space standards as far as practical. A number of small non-compliance private tenure units are proposed, situated within the proposed New Oxford Street block. These units provide a shortfall of 2sqm to minimum space standards as a result of the existing building structures and heritage constraints. In this scenario, a balance between the very small shortfall, general high-quality design and residential amenity of the units against the implications upon the existing building structures has been taken into account and the shortfall deemed acceptable. The Proposed Development will provide 10% (three units) which will be wheelchair accessible whilst the remaining homes are designed to be accessible and adaptable dwellings.
- 5.138 The Council refers to the London Plan (20121) requirements for private amenity space provision which requires:
- A minimum of 5sqm of private outdoor amenity space should be provided for 1 – 2 person dwellings and;
 - an extra 1 sqm to be provided for each additional occupant.
- 5.139 Local Plan (2017) Policy A2 sets out that new developments will be expected to include private amenity space for use by residents and workers, unless it can be demonstrated that it is not practical to do so due to the location and/or site constraints
- 5.140 Based upon the above, the proposed development results in the following private amenity space requirements.

	LB Camden Requirement	London Plan Requirement	Proposed Provision
Private Amenity Space	248 sqm	248 sqm	270 sqm

- 5.141 Across the residential component of the proposed development, a total of 270 sqm of private amenity space is proposed. Out of all the new units proposed, 9 units will have no private amenity space provision. 6 of these units (all private) are located in the refurbished building fronting New Oxford Street which will replace existing poor quality residential units (which have no private amenity space as existing) with higher quality units. The lack of private amenity space is due to the physical and heritage constraints of the existing buildings which makes it not possible to provide private amenity space in this location. The other 3 units (all private) are located in the new High Holborn block and the site boundary result in a constrained footprint for these units which subsequently makes it unviable to also provide amenity space to these units. Given these constraints, as well as the site's central London location and the extensive public realm enhancements that will be delivered by the wider development, the private amenity provision across the site, which includes policy compliant provision for all the affordable units, is considered to be acceptable and accordance with planning policy.
- 5.142 Additionally, each of the units have been designed with regard to both Camden Planning Guidance and the Mayor's Housing SPG, with the residential accommodation receiving adequate levels of daylight and sunlight, natural ventilation and outlook, floor to ceiling heights and accessibility.
- 5.143 The proposed development has been designed to deliver a high-quality residential environment, replacing existing low quality residential as well as increasing the quantum of residential floorspace on the site. Further analysis of the quality of the residential accommodation is included in the supporting Design and Access Statement prepared by DSDHA

Open and Play Space

- 5.144 The London Plan (2021) seeks to ensure a satisfactory level of local open space provision and will both resist its loss and encourage proposals to enhance open space to provide a greater range of benefits for Londoners. Enhancements can include improved public access, inclusive design, recreational facilities, landscaping improvements or SUDs.
- 5.145 The London Plan Play and Informal Recreation SPG (2011) provides a benchmark recommendation for play space provision of 10 sqm per child. The SPG recommends that boroughs develop benchmark standards in the context of their own play and open space strategies, taking into account their local circumstances.
- 5.146 Local Plan (2017) Policy A2 requires combined open space and play space provision. The Council do not differentiate between open and play space figures with the open space requirements including an allowance for formal and informal areas of play. Policy A2 sets out the following combined open and play space requirements for new developments:

Development type	Open space provision
Residential (all types)	9 sqm per additional occupier.
Commercial development	0.74 sqm per additional worker

5.153 The site is located within one of the most central and densely developed parts of the Borough. Additionally, the West Central Street component is highly restricted in terms of physical and heritage constraints. It is in this context that the proposed development needs to be assessed against the relevant planning policy requirements for open space and play space.

5.154 The overarching strategy for bringing forward the redevelopment of the site has always been to deliver an exemplar open space and ground floor experience and this is reflected in the design quality of proposed open and play space in addition to the overall quantum.

5.155 Proposed amenity spaces are to be distributed at all levels across the development. At ground floor level this includes public ground floor accessible spaces and a wider range of landscaping improvements to enhance existing green spaces and create a more attractive and useable area for visitors to the site. For office occupiers, the provision of roof gardens and terraces have been provided, whilst private amenity provision in the form of balconies is proposed for the majority of residential units combined with the addition of shared amenity space for residents in the form of a courtyard and terraces.

Play Space Requirements – London Plan

5.156 Under London Plan (2021) policy requirements, the current scheme would result in the following approximate (figures rounded up and down accordingly) from the calculator) play space requirements across the site:

- **Ages 0, 1, 2, 3 & 4** **77 sqm**
- **Ages 5, 6, 7, 8, 9, 10 & 11** **62 sqm**
- **Ages 12, 13, 14 & 15** **33 sqm**
- **Ages 16 & 17** **18 sqm**

5.157 This would result in a total of **139 sqm** for under 12s and **51 sqm** for over 12s.

Open and Play Space Requirements – Local Plan

5.158 In calculating the requirement for the residential component, the Council provide an occupancy rate for each ward. In this case the residential occupancy rate for Holborn is 2.28.

5.159 In calculating the non-residential component, the Council refer to the Employment Density Guide (3rd Edition) in which to calculate employment density per land use. The non-residential densities would be as follows:

Land Use	Employment Density
Office (Professional Services)	13sqm (NIA) per FTE
Retail / F&B	20 (NIA) per FTE

5.166 In calculating the requirements, taking into account the above, the following provides a summary of the open space requirements across the site and proposed provision. These figures are based upon a 15% variance from GIA to NIA.

Land Use	Additional Floorspace	Formula	Open Space Requirement
Office	22,026 sq m (NIA)	$0.74\text{sqm} \times (22,026 / 13)$	1,253.79 sqm
Retail / F&B	855 sqm (NIA)	$0.74\text{sqm} \times (855 / 20)$	31.64 sqm
Residential	36 units (additional)	$9\text{sqm} \times 2.28 \times 36$	738.72 sqm
Total			2024.15 sqm

5.188 Taking into account the above calculations, based on the Council's combined open space and play space requirements, the total requirement across the site would be **2024.15 sqm**.

Proposed Provision

5.189 The accompanying Design and Access Statement prepared by DSDHA provides a detailed breakdown of the proposed open space and play space provision across the site. The following provides a summary of the proposed open and play space provision across the site.

	LB Camden Requirement	London Plan Requirement	Proposed Open Space Provision	Total Open + Play Space Provision
Open Space	2024.15 sqm	N/A	2, 046 sqm (communal terraces and public realm)	2,197 sqm (play + public realm + communal terraces)
Play Space		190 sqm (139 sqm for under 12s and 51 sqm for over 12s)	151 sqm	

5.190 As illustrated, the proposed development will significantly exceed the overall requirement and provide a total of **2,197sqm** of open space across land within the Applicant’s ownership. This will be provided as follows:

- **1083 sqm** provided as public realm within the Applicant's ownership across the site.
- **509 sqm** provided as communal offices terraces within Museum Street building.
- **151 sqm** provided as play space within the West Central Street courtyard.
- **195 sqm** of communal open space within the Vine Lane block - **74 sqm** within the courtyard and **121 sqm** at level 4.

5.191 In addition to the above, the proposed development will also include **729sqm** of public realm and streetscape improvements outside of the applicant’s ownership to significantly improve the wider public realm and tie in with the works that are coming forward as part of the West End Project.

5.192 Given the site location and the site constraints that have been identified, it is considered that the over 12’s play provision can be adequately accommodated through the extensive public realm improvements in and around the site, as well as through existing facilities within the local area. This includes the following within 800m of the site:

- St Giles Playground - Children’s playground & basketball court

- Bloomsbury Square - Gardens park with green open space and children playground.
- Drury Lane Gardens - Park with children's playground and multi-sports court.
- Alf Barrett Playground - Children's playground with outdoor fitness equipment.
- Lincoln's Inn Fields - Park with green open space and netball and tennis courts.

5.193 The site wide approach to open space, play space and public realm works is considered to represent a significant planning benefit that will directly enhance the contribution the site makes to this important part of Camden. It is therefore considered that the proposed development not only meets but exceeds the Council's policy requirements for open space. Whilst the play space provision for over 12's does not meet policy requirements it is considered that existing facilities in the local area are sufficient to serve the increase in demand generated by the proposals.

Daylight, Sunlight and Overshadowing

5.194 The proposed development has had regard for daylight and sunlight to surrounding buildings as well as to its own proposed buildings. A daylight and sunlight report to assess potential impacts was undertaken by GIA and accompanies this application submission.

5.195 With regards to internal daylight and sunlight conditions of the proposed development, the report highlights that the design has responded well to the site constraints. Whilst some units demonstrate daylight levels below guidance, the internal arrangement and window sizes have been designed with daylight and sunlight in mind, making the most out of the light available within this significantly obstructed location. Overall, the report notes that the design of the buildings has struck a balance between daylight and sunlight, and overlooking issues toward the proposed office blocks, as well as the surrounding context, successfully optimising the daylight and sunlight provision as far as possible.

5.196 In terms of overshadowing, the report highlights that the proposed courtyard space falls short of the recommended target for at least half of its area to receive direct sunlight for two hours or more on the spring equinox. During the design stage a number of technical assessments were carried out to understand how to best shape the massing in order to allow this space to receive adequate levels of sunlight. It is worth noting that the massing to the south of the site is only five storeys high and broadly follows the heights of its surrounding residential elements. Even if the massing was reduced to three storeys, the area would still not receive the levels of sunlight recommended by BRE. This is expected given the courtyard arrangement which does not favour direct sunlight exposure in winter and mid-seasons. The courtyard space will receive 3 -4 hours of direct sunlight across the majority of the

space during the summer months. On this basis the report concludes that the sunlight provision is in line with expectations given its courtyard arrangement and location within a dense urban context.

- 5.197 With regards to neighbouring buildings, the report concludes that the proposed development is appropriate in its context. The technical analysis shows that following implementation of the proposed development, some surrounding properties will experience changes outside of the BRE recommendations, however the potential effects to neighbouring daylight and sunlight amenity do not amount to unacceptable harm of daylight and sunlight amenity. Furthermore, the neighbouring amenity space at Princes Square meets BRE recommendations and remains BRE compliant.
- 5.198 Any harm to the receipt of daylight and sunlight upon implementation of the proposed development, is considered to be acceptable in this Central London context, thus according with the Camden Local Plan (2017) and London Plan (2021) tests.

Wind / Microclimate

- 5.199 An Environmental Wind Planning Report, prepared by Arup, has been submitted as part of this planning application submission. The report provides an assessment of the effect on the wind environment that would arise from the proposed development.
- 5.200 The report concludes that the ground level windiness around the site would remain generally similar to existing, however there will be increased levels of windiness experienced along West Central Street. The report recommends local mitigation, in the form of a recess to primary entrances which face this street and this has been incorporated into the design of the proposals.
- 5.201 With tested mitigation measures consisting of proposed trees and a solid balustrade, wind conditions on the upper floor levels terraces of 1 Museum Street were found to be generally suitable for short term seating and entrances. Wind conditions on the Vine Lane terrace, and within the courtyard of West Central Street were also found to be suitable for outdoor seating. A review of windiness on the roof terrace of the Post Building was found to be similar to existing with exception of the western roof section where the local windiness increased by one category.
- 5.202 In terms of analysis of cumulative surroundings, the report concluded that these are relatively distant from the site and measured wind conditions would remain similar to those with existing surroundings.

Flood Risk

- 5.203 According to the Environment Agency's Flood Risk Map, the site is located within Flood Zone 1 and as such, it is deemed to be appropriate for development as per LB Camden's Strategic Flood Risk Assessment.

- 5.204 A Flood Risk Assessment, as prepared by Arup, accompanies this application. The report confirms that, based on EA information on flood risk from rivers and sea, the area within which the proposed development is located has been assessed to be Low Risk. The risk of surface water flooding and ground water flooring on the site was also deemed to be low. The report acknowledges that there are areas of ground water flooding risk within 100m of the site and therefore recommends that this is taken into account in the below ground drainage strategy.
- 5.205 The assessment therefore concludes that overall the site is as low risk of flooding occurring from all sources.

Transport, Access and Servicing

- 5.206 A detailed Transport Assessment, Travel Plan and Delivery & Servicing Management Plan have been prepared by Arup to accompany this application. These documents consider how the proposed development would impact on the surrounding transport network and the requirements in terms of deliveries and car and cycle parking.
- 5.207 Paragraph 106 of the NPPF 2021 states planning policies should support, amongst other things, an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. Further, paragraph 111 goes on to say development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.208 At a local level, adopted policy T1 seeks to ensure new development is located in places that encourage walking, cycling and the use of public transport. New developments should also be designed to provide safe, pleasant and convenient access for pedestrians and cyclists. Local Plan Policy T2 seeks to limit the availability of parking and requires all new development in the borough to be car free.
- 5.209 The site's Central London location means that it is well served by most essential amenities, including retail, green spaces and schools. The streets surrounding the site benefit from wide footways, and several pedestrian crossings with dropped kerbs and tactile paving are available in close proximity to the site. The site is located in an area of excellent public transport accessibility. Three London Underground stations are located within a short walking distance of the site, and over 400 buses an hour in peak hours are also available. Step-free access is available at one of the nearby London Underground stations.

Car Parking

5.210 The proposed development seeks to promote sustainable modes of transport. Given the highly accessible nature of the site by public transport, no car parking will be provided in accordance with London Plan (2021) and LB Camden Local Plan Policy T2. No disabled car parking is proposed, owing to the constraints of the public realm and highly accessible nature of the site by public transport. There is an on-street disabled parking bay available within 65m of the site, and an additional four available within 250m of the site. In addition, step-free access is available at Tottenham Court Road station.

Cycle Parking

5.211 Cycle storage will be provided in accordance with London Plan (2021) standards and designed in accordance with the London Cycle Design Standards guidance. It has been agreed in pre-application discussions with the Council that the additional 20% of spaces over and above London Plan standards will not be sought for this development, owing to the constraints of operating within an existing basement and to support person movement within the public realm.

5.212 A total of 438 long-stay cycle parking spaces and 62 short-stay cycle parking spaces are proposed which will be allocated as follows:

- 345 long stay cycle parking spaces allocated to the office component.
- 9 long stay cycle parking spaces allocated to the flexible town centre uses floorspace component.
- 84 long stay cycle parking spaces allocated to the residential component.
- 62 cycle parking spaces allocated to visitors to the site and located within the public realm areas.

5.213 The proposals are in accordance with London Plan (2021) standards for all long stay provision and for short stay provision which is assigned to office and residential use. Considering the objective to create a new high quality public realm and maintain footway widths, it is proposed that the short stay provision for the flexible E Class use is discounted by 50%.

5.214 As part of the proposals to create a new service yard access on High Holborn, the relocation of some of the cycle hire stands adjacent to the site is required to facilitate access to the proposed vehicle service yard lift. Various options have been reviewed with reference to TfL's Developer Guidance for Santander Cycles document (2015). It is considered that the most appropriate option is to relocate five stands slightly eastwards of their current position on High Holborn whilst maintaining the existing

cycle hire station. The principle of the redistribution of cycles has been discussed and agreed in principle with TfL during pre-application meetings.

Servicing

- 5.215 In accordance with the Council's policy that recommends off-street servicing for larger developments, a dedicated servicing yard will be provided in the basement of the Museum Street block, accessed via a lift from High Holborn. This will be used by the Museum Street and Vine Lane buildings. Vehicles will be able to enter and exit the servicing lift in forward gear. At the service lift exit, the building will incorporate a 1.5m to 2m visibility splay on either side of the access to enable a service vehicle driver to see when it is safe to egress the lift. Two 8m loading bays, with 3m offloading areas, will be provided at basement level to accommodate the forecast demand (based on current floor areas) of five servicing trips in the peak hour.
- 5.216 Access to the vehicle lift will be carefully managed to ensure pedestrian safety and prevent vehicles queuing on the footway or highway to access the lift. A number of measures will be in place, including a booking-in system and a minimum of two site operatives to manage access. In the event of the lift breaking down, an alternative servicing arrangement will be available, involving the use of the existing loading bay on Museum Street and on-street servicing on West Central Street close to the scheme's goods lift.
- 5.217 The other buildings (High Holborn and West Central Street) are forecast to generate a low number of daily servicing trips. Servicing for this part of the site is proposed to take place from the existing loading bay on Museum Street and a newly proposed loading bay on Grape Street as part of the West End Project.
- 5.218 Further information with regards to the proposed servicing strategy can be found within the accompanying Delivery and Servicing Management Plan.

Access

- 5.219 An Access Summary accompanies the application and provides a summary of design features to create an inclusive environment, where all spaces and buildings are designed inclusively to ensure that they are safe to use, easy to understand, easy to use and facilitate activities for a wide range of diverse users. The proposed development has taken into account relevant policy, regulation, including Approved Document M and BS300 and good practice.

Waste Management

- 5.220 A waste management strategy has been prepared for the proposed development and can be summarised as follows:

- Museum Street and Vine Street commercial waste – waste store to be provided at basement level. With bin or pallets moved to loading bays on collection vehicle arrival.
- West Central Street commercial waste – waste to be stored within the units and taken in bins and bags to the kerb once a day immediately prior to collection.
- West Central Street residential waste - Waste will be brought to the bin store by residents using their lift. Council operatives will collect the bins directly from the store and transfer them to the collection vehicle.
- High Holborn commercial waste – waste to be stored within the unit and taken in bins or bags to the kerb once a day immediately prior to collection
- High Holborn residential waste - Council operatives will collect the bins directly from the store and transfer them to the collection vehicle which will stop on the highway to carry out this collection.

Vine Lane residential waste - Council operatives will collect the bins directly from the store and transfer them to the collection vehicle which will stop on the highway to carry out this collection.

Impact Assessment

- 5.221 The trip generation assessment within the accompanying report indicates that there will be a total of 770 AM peak hour two-way trips and 761 PM peak hour two-way trips generated by the proposed development. The impact on all local public transport services, active travel modes and the highway network has been shown to be negligible in the context of the existing networks. Future changes to local transport networks will also significantly increase the amount of public transport capacity available in the local area. At this stage no further mitigation over and above that embedded within the proposed development is considered to be required.
- 5.222 The design and layout of the site will follow Transport for London's (TfL) Healthy Streets approach, which prioritises active and sustainable travel. A new north-south pedestrian route through the site ('Vine Lane') will increase the permeability of the site and improve its connections with the local area. This route will be direct, attractive and provide high quality public realm, which will help to create a place where people feel relaxed and safe and encourage use by people from all walks of life. The removal of the NCP car park will also significantly increase the attractiveness of the site and enhance the local environment for walkers and cyclists.

- 5.223 A Framework Travel Plan (FTP) has also been provided as part of the planning application. The FTP sets out a range of measures and initiatives aimed at encouraging the use of active and sustainable travel for users of the proposed development.
- 5.224 The Mayor's Transport Strategy (2018) is supported by the proposed development through the provision of new jobs in a site with an excellent public transport accessibility level. Active travel modes are fostered by a high-quality cycle parking provision and associated on-site facilities.
- 5.225 The proposals will also correspond with TfL's Vision Zero strategy. The car-free nature of the development will mean that vehicular movements to the site are limited. In accordance with TfL's Vision Zero strategy and the Council's Local Plan (2017) the majority of the servicing activity will take place on-site. The site is also designed in accordance with Vision Zero's 'safe streets' principles; wide pedestrian routes and improved soft and hard landscaping will both be provided.
- 5.226 Based on the assessment, it is considered that the proposed development is policy compliant and delivers improvements towards Transport for London's (TfL) Healthy Streets approach, and accords with TfL's Vision Zero aims and Mayor's Transport Strategy.

Energy and Sustainability

- 5.227 A Sustainability Statement, Circular Economy and Energy Statement have been submitted in support of the Application. The overarching sustainability objective is to fully embrace the sustainability and Net Zero Carbon objectives of Camden and the London Plan, and to go further by adopting voluntary standards such as WELL Building Standard, to ensure the health and wellbeing of site users and occupants.
- 5.228 In addition, the proposed Museum Street office development has adopted the London Energy Transformation Initiative (LETI) Climate Emergency Design Guide and is following, as far as practicable, the measures and indicators as a route to achieving Net Zero Carbon. To demonstrate the Applicant's level of commitment to achieving Net Zero Carbon, and to support knowledge-sharing of ideas and lessons learned, Museum Street is registered as a LETI Pioneer project and has committed to the KPI of fossil fuel-free heating and hot water.
- 5.229 A summary of the key sustainability and energy measures are set out below.

Energy and Carbon

- 5.230 With an emphasis on the global climate crisis, the GLA and the Council have declared a 'Climate Emergency'. There is a growing commitment to achieving Net Zero Carbon buildings by 2030, meaning many new developments need to consider now how far they can go to design in features to enable the lowest carbon performance possible.

5.231 London Plan (2021) Policy GG6 seeks to improve energy efficiency and support the move toward a low carbon circular economy. The policy seeks to ensure that buildings are designed to adapt to climate change and its impacts.

5.232 In line with London Plan and LB Camden policy requirements, the energy strategy for the proposed development is in accordance with the following energy hierarchy:

- Be lean – reduce demand and consumption
- Be clean – increase energy efficiency
- Be green – provide low carbon renewable energy sources

5.233 The scheme seeks to target Net Zero Carbon and a review study has been carried out of the design measures and indicators which would need to be considered in order for the building to aim towards this. This study was based on measures set out in the London Energy Transformation Initiative (LETI) Climate Emergency Design Guide (2020). Due to the efforts being made by the project team in this area, the proposed development is registered as a LETI 'Pioneer Projects' and is part of the network of other projects aspiring for Net Zero Carbon.

5.234 The Applicant is committed to reducing energy demand and CO₂ emissions related to the proposed development. The following measures are therefore proposed:

- Best practice building fabric performance, improving upon Part L notional building u-values and air permeability rate.
- Consideration for appropriate glazing to solid ratio, balanced with requirements for daylighting, views out, and commercial marketing requirements.
- Provision of a means of natural ventilation where external conditions allow
- Mechanical ventilation with high efficiency heat recovery.
- Low energy lighting with occupancy sensing and daylight dimming controls.
- Fossil fuel free for heating and hot water
- Air Source Heat Pumps

- 5.235 The accompanying Sustainability Statement confirms that the lean target across domestic and non-domestic elements has been exceeded and overall performance across the be lean, be clean, be green energy hierarchy exceeds the minimum 35% level
- 5.236 London Plan (2021) Policy SI 2 seeks to achieve a minimum onsite carbon reduction of at least 35% beyond Building Regulations Part L and developments are required to calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLCA) and to demonstrate actions taken to reduce life-cycle carbon emissions.
- 5.237 A Whole Life-Cycle Carbon Assessment was carried out following the GLA Whole Life-Cycle Carbon Assessments Guidance (April 2015) in accordance with BS EN 1578, with additional guidance from RICS Professional Statement. The results can be found in the WLCA report that has been submitted with the planning application.
- 5.238 In summary, the proposed development, achieves both London Plan (2021) and LB Camden energy and carbon policy requirements.

Urban Greening and Biodiversity

- 5.239 The London Plan (2021) Policy G5 sets a recommended target of 0.3 Urban Greening Factor for non-domestic led developments, based on a calculation method that apportions a specific value to different types of vegetation and green infrastructure.
- 5.240 The existing site has an Urban Greening Factor (UGF) of 0.16. The proposed development provides an Urban Greening Factor of 0.3. This has increased from 0.27 UGF as requested by the GLA in response to the original is provided through the addition of terraces, green roofs, a courtyard and through the retention and planting of trees, shrubs and plants.
- 5.241 The proposed development has sought to maximise all opportunities to enhance green provision that the proposed development provides a significant increase in urban greening in this location in comparison to the existing position on site.

Circular Economy

- 5.242 A Circular Economy Statement has been prepared in support of this planning application. The report outlines the circular economy strategy for the site and how the proposals address relevant London Plan Policy S17 regarding the transition toward innovative building design that avoids waste, supports high recycling rates and helps London transition to a circular economy.
- 5.243 The Statement demonstrates how the development is planning on incorporating circular economy measures into all aspects of the design, construction, and operation of the buildings. The site will do this in the following ways:

- Non-hazardous demolition waste will be diverted from landfill through reuse, recycling and recovery.
- The design has taken into consideration the durability of proposed construction materials to limit the need for repair and to avoid premature replacement as far as practicable.
- In line with the BREEAM credit Mat 06- Material Efficiency, at the end of each RIBA stage the project team has and will continue to examine opportunities to implement appropriate measures to ensure that the amount of materials used in the construction of the proposed development are optimised, and therefore reduce the amount of construction waste arising from site.
- All non-residential buildings will not exceed the target of ≤ 7.5 m³ or ≤ 6.5 tonnes per 100 m² Gross internal floor area. Residential buildings have targets for non-hazardous construction waste not to exceed to 26.52m³ or 16.90 tonnes per £100K of project value.
- A Design for Disassembly and Functional Adaptability study has been undertaken for the key commercial buildings (Museum Street and Vine Lane) to identify opportunities for accommodating future changes of use to the buildings over their lifespan, and how they could be incorporated into the design proposals. The study has been prepared to comply with BREEAM credit issue Wst 06.
- A sustainable procurement plan has been developed which sets out a clear framework for the responsible sourcing of construction products to guide procurement throughout the project and by all involved in the specification and procurement of construction products. The development will be designed to maximise its life cycle where possible. The development will also be designed to be adaptable of flexible as possible and optimize the chances of reusability and recoverability.
- Dedicated, sufficiently sized waste storage for general refuse and recyclables is provided for all the building elements, located in appropriate, accessible locations.

5.244 Further details as to the proposed measures can be found within the Circular Economy Statement which accompanies this submission.

Overheating

5.245 London Plan (2021) Policy SI 4 requires development proposals to minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. This is reiterated within the Council's Local Plan Policy CC2 which notes that

measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy should be adopted as part of any development.

- 5.246 In order to mitigate against this, the proposed development incorporates a variety of trees and shrubs to protect from both heat and UV radiation by directly shading both buildings and outdoor spaces. Proposed trees, green roofs and other soft landscaping will also provide evapotranspiration which in turn cools the local environment. The landscaping design will also incorporate features such as green infrastructure and street furniture which allows for gentle air flow and passage through spaces.

Health & Wellbeing

- 5.247 Camden's 5-year Climate Action Plan includes a requirement whereby "public spaces will encourage and enable healthy and sustainable travel choices and promote biodiversity". For the proposed development this means ensuring users, visitors and local people have access to healthy workspaces, good access to amenities, sustainable transport options, and open green space for recreation and relaxation.
- 5.248 A Health Impact Assessment (HIA) has been prepared to identify any potential effects on the health and well-being of both the new and the existing population arising from the Proposed development, taking account of the key determinants of health. Where an impact is identified, actions and measures are recommended to mitigate an adverse impact or to enhance or secure a positive impact.
- 5.249 The results of the HIA conclude that the proposed development achieves the objective of creating a healthy, successful place for people to live and work in, and that no negative impacts to health have been identified following the implementation of suggested mitigation.
- 5.250 Several of the proposed measures have been guided by features set out in the WELL Community assessment standard; however formal certification is not being pursued due to the site not being eligible. The proposed development puts forward a number of measures in which to promote physical and mental health and wellbeing, most notably:
- Provision of new flexible office space, coworking space, and retail space, which would support new employment in the Borough and provide workspace for individuals as well as small, medium, and large businesses.
 - Making a positive contribution to local housing needs by providing a proportion of affordable residential dwellings.
 - Provision of a new route through the site for pedestrians, increasing the accessibility and safety of the site and surrounding area. Wayfinding measures to be incorporated into the public realm design.

- Advice received by a security specialist on designing out crime and promotion of safety around the site.
- Opening up of the site to provide private and public open space in addition to extensive and varied soft landscaping.
- Separation of traffic from the public realm and pedestrian routes as far as practicable.
- Impacts on noise, air quality and other environmental indicators reduced or mitigated through best practice management.
- Good access to daylight with glazing maximized across all buildings where possible and appropriate.
- Thermal comfort interventions with low overheating risk through passive-led design.
- WELL Building Standard 'Platinum' rating targeted for Museum Street with the Vine Street component adopting the principles in order to be assessed at a later stage.

5.251 Based upon the above, the accompanying Sustainability, Energy and Circular Economy Statements conclude that the proposed development has been designed to achieve a very high level of performance that meets and endeavors to exceed key sustainability targets and standards.

Noise and Vibration

5.252 Paragraph 185(a) of the NPPF (2021) states that planning policies and decisions should mitigate and reduce to a minimum potential adverse impact resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and the quality of life.

5.253 A noise assessment has been undertaken by Scotch Partners and submitted as part of this application submission.

5.254 The assessment concludes that external noise intrusion into new apartments with windows closed are expected to generally fall into the 'green' threshold band as per LB Camden Local Plan thresholds. Indoor ambient noise levels are expected to be in line with the criteria given in ProPG: Planning & Noise (May 2017) as well as other commonly adopted criteria. With windows open, new residential elevations facing New Oxford Street and High Holborn will be exposed to noise levels that are considered above the "Significant Observed Adverse Effect Level" according to guidance published by the Association of Noise Consultants. On this basis, mechanical cooling will be provided to these apartments so that occupants are not required to open windows during hotter times of year.

- 5.255 External noise emission to neighbouring properties has been assessed based on indicative plant selections and the results of an external noise survey. The BS 4142: 2014 rating level for noise emission from normal-use plant has been predicted to be lower than the background sound level at all times of day. This is indicative of a low impact according to the methodology, and would fall into the “amber” threshold within the LB Camden Local Plan. The proposals include for a large array of attenuation and silencing measures, but it is considered unlikely that the requirements of the “green” threshold could be met without significantly reducing the building services provisions for the scheme. As the proposals are expected to remain within the “amber” threshold of the Local Plan, and are not expected to result in an adverse impact according to the assessment methodology of the recognised British Standard, it is considered that these proposals should be considered acceptable to Camden Council.
- 5.256 Generally, the proposed apartments are not predicted to be subject to groundborne noise levels during train passbys that would exceed Camden Council’s “green” threshold as described in the LB Camden Local Plan. However, resonances in the retained structure used in some of the apartment buildings in the West Central Street development may lead to levels that would fall into the “amber” category. It is not believed that these could be reduced to meet the “green” threshold without replacing the retained structural elements entirely.
- 5.257 The proposals are therefore expected to remain with the “green”/“amber” thresholds given in the Local Plan and mitigation measures have been provided in which to avoid the risk of a significant observed adverse effect level. As such, it is considered that these proposals should be considered acceptable in planning policy terms.

Air Quality

- 5.258 The NPPF (2021) requires the planning system to prevent development from contributing to or being put at unacceptable risk from unacceptable levels of air pollution.
- 5.259 A detailed Air Quality Assessment has been prepared by Arup and is submitted with this application. The report notes that the site is classified as high risk to dust soiling and low risk to human health effects from dust generating activities prior to the application of any mitigation measures. With the implementation of mitigations measures, as detailed within the report, the residual effects would be negligible and not significant.
- 5.260 During the operation of the site, the report notes that there will be approximately 68 deliveries a day, whilst the proposed development is to be car-free. Emissions associated with the additional traffic are expected to be negligible and no significant effects are expected from the additional traffic during the operation of the proposed development.

- 5.261 An assessment against the 'air quality neutral' criteria was undertaken in relation to building and transport emissions. The proposed development emissions and development trip rates were calculated to be below the relevant benchmarks for all land-use classes, and therefore, the proposed development complies with the 'air quality neutral' criterion.
- 5.262 Finally, the report notes that air quality is anticipated to improve around the area of the site in future years, aided by the improvement in traffic emissions through the introduction of two-way flow on roads around the site (A40 High Holborn) and the removal of the existing NCP car park.
- 5.263 The report therefore concludes that there will be no significant effects on air quality as a result of the proposed development. Please refer to the Air Quality Assessment for full details.

Trees

- 5.264 An Arboricultural Impact Assessment has been prepared by Tim Moya Associates and accompanies this planning application.
- 5.265 The report acknowledges the proposed removal of 9 existing trees on site, including a single Cat B early-mature London plane tree and eight Cat C trees. The report notes that the loss of the Cat B tree is the only noteworthy removal, in arboricultural terms, with the other trees being low-quality specimens. The report acknowledges that 10 new trees are proposed (all London plane, except for a single honey locust) and concludes that the replacements will ensure the character of the site and public realm is protected for the long term.
- 5.266 The report confirms that a total of 5 retained trees will require crown pruning in order to permit the required access for works, but that these works are localized and will not adversely impact on the condition and amenity value of these trees. Whilst full details of protection measures cannot be provided at this stage, the report concludes that the retained trees can be suitably protected and that these details will form part of an Arboricultural Method Statement to be provided via planning conditions subsequent to a positive decision being issued.

Ecology and Biodiversity

- 5.267 Paragraph 174 of the NPPF (2021) states that applications should enhance the natural and local environment by recognising the wider benefits of ecosystem services and minimising impacts on biodiversity, by providing net gains where possible in and around developments.
- 5.268 An Ecological Assessment has been produced by BHSLA and accompanies this planning application. To inform the proposals a Preliminary Ecological Appraisal (desk study and Extended Phase 1 Habitat Survey) was also undertaken in July 2020.

- 5.269 The report concluded that there are no sites designated for nature conservation in close enough vicinity to the site to be of relevance in relation to the potential adverse ecological effects. No semi-natural habitats were found to occur at the site, although street trees were found to be present along Museum Street and High Holborn. Whilst these trees were found to be non-native and in poor condition, the report acknowledges their value for a range of ecosystem services within an urban context.
- 5.270 No evidence of roosting bats were found at the site either during the initial habitat survey, nor during the subsequent emergence survey. The report found that there was evidence of nesting Feral Pigeon on site, but there was no evidence of any other species of bird nesting or roosting.
- 5.271 The report recommends that 9 trees are replaced by 10 semi-mature trees of suitable species, whilst the remainder are retained and protected during building works. The report also provides a number of mitigation measures to deter nesting Feral Pigeons during demolition works and confirms the halting of works if Feral Pigeon or bats are to be found on site during building works.
- 5.272 With regards to biodiversity net gain, the report concludes that a number of key enhancements to the site are proposed, providing an Urban Greening Factor of 0.3.
- 5.273 In addition, based on Natural England's Biodiversity Net Gain Version 3.1 calculator, the expected net gain in habitat units would be 70 % without breach of trading rules. Whilst this is a substantial net gain it should be noted that it does not account for the particularly biodiverse nature of the intensive green roof proposals, nor the proposed provision of artificial wildlife refuges.
- 5.274 The report concludes that the increase in habitats at this location will be a valuable addition of biodiversity in an area of Ecological Deficiency and will contribute to strengthening the potential movement corridors for wildlife throughout this part of London.

Archaeology

- 5.275 An Archaeology Assessment, prepared by Arup, accompanies this planning application. The assessment notes the sites positioning between High Holborn and New Oxford Street and that this area of London has been developed since at least the 16th century. As a result, there is a low potential for archaeological remains of prehistoric, medieval and post-medieval date within the site and survival is likely to have been limited by the construction of the present and earlier buildings within the site.
- 5.276 The report highlights that the highest area of archaeological potential lies under the course of West Central Street. The current buildings on site date to the post-medieval period and the later 20th century. Whilst none of the buildings within the site are designated, there are three listed buildings
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located immediately to the north of it along the frontage of New Oxford Street and the site partially lies within the Bloomsbury Conservation Area.

- 5.277 The report concludes that the construction of the proposed development has the potential to encounter and impact upon buried archaeological features during below ground excavation works. This has been assessed as resulting in a slight adverse effect on buried archaeological features, should they exist within the site.
- 5.278 Due to the low potential for archaeological survival within the areas of the site to be redeveloped, a programme of archaeological observation and recording during construction has been recommended. This proposed programme of archaeological observation and recording during construction would be designed and agreed in consultation with the GLAAS archaeologist and would allow for the observation and recording of any archaeological remains which may be removed by the proposed development and dissemination of the results. This would reduce the scale of loss or harm to the significance of potential heritage assets encountered during construction of the site and reduce

Section 106 Heads of Terms

5.279 The Applicant is fully committed to the delivery of the proposed development on the site. As part of the delivery of the proposed development, the Applicant will enter into a Section 106 Agreement and are committed to securing the following Heads of Terms:

- Affordable workspace.
- Employment and Training Strategy.
- Construction apprenticeships
- Local recruitment for construction related jobs
- Construction work experience placements
- Local Procurement Code
- Employment in development after completion contribution
- Employment in development after completion contribution - apprenticeships
- Open space contribution

- Public route through the site
- Pedestrian, Cycle and Environment contribution
- Highways works contribution
- Car-free (residential and commercial).
- Construction Management Plan (CMP) and monitoring fee.
- Travel Plan for all proposed land uses.
- Delivery and Servicing Management Plan.
- Basement Construction Plan.
- Sustainability Plan & Energy Plan
- Carbon offset contribution

5.280 In addition to the Section 106 Heads of Terms, the Applicant is also committed to the relevant CIL contributions.

6. CONCLUSIONS

- 6.1 This Planning Statement has been prepared on behalf of Lab Selkirk House Ltd in support of an application for planning permission for proposed development at Selkirk House, 166 High Holborn and 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street, London, WC1A 1JR.
- 6.2 The planning application seeks planning permission for a series of new buildings across the site, ranging in height from 4 storeys to 19 storeys. The proposed development comprises the provision of 48 residential units, including 18 affordable homes and the provision of 24,197 sqm of non-residential floorspace.
- 6.3 The proposed development has evolved through an extensive pre-application and wider stakeholder consultation process, which has included collaborative discussions with the Council, Greater London Authority ('GLA'), Transport for London ('TfL'), Historic England ('HE'), and a number of other key stakeholders.
- 6.4 The proposed development provides the opportunity to regenerate this strategically important site through the demolition and refurbishment of the existing poor-quality buildings and replacement with a highly sustainable mixed-use development. The proposed development will deliver all the key master planning requirements and uses specified by the Local Plan (2017), the Holborn Vision and Urban Strategy (2019), and the Draft Site Allocations Plan (2020), providing the opportunity to deliver a wide range of planning and public benefits.
- 6.5 This Planning Statement assesses the planning considerations associated with the proposed development in the context of national, regional and local planning policy and guidance. The Statement concludes that the proposed development accords with policy and will provide a wide range of planning and public benefits as detailed within this Statement and the associated supporting documents.
- 6.6 The proposed development would deliver a sustainable and economically viable development. It will deliver much needed new jobs and homes, together with high quality accessible open space and a new pedestrian route through the site significantly improving the permeability of the area.
- 6.7 The proposals are considered to fully comply with the relevant development plan, as required by Section 36 (8) of the Town and Country Planning Act 1990 (as amended).