

Address: 151 Shaftesbury Avenue, WC2H 8AL

Follow-up to previous pre-app response to 2022/2716/PRE

Pre-app ref: 2022/4250/PRE

Meeting at BGY offices: 18/10/2023

Description: Full refurbishment of the building, recladding, 3 storey roof extension on 8th, 9th and 10th floors, rear infills on existing 5th- 8th floors to provide offices (Class E) with a uplift of approximately 994sqm.

Land use

- Additional information has been provided in response to the mixed-use policy H2, which requires 50% of all additional floorspace to be self-contained housing subject to several considerations.
- Four flats have been shown integrated within the building, at the rear north corner, above the other residential flats. Due to current standards, these would require an upgraded stair core and structural interventions to the building. The issues of viability, provision of cycling facilities, outdoor amenity space and compliance with accessibility requirements are raised as a potential impediment to achieving this.
- A viability assessment would be required to detail the limitative aspects of this proposal.
- In relation to cycling, the Council is working on creating additional cycle parking spaces in public areas to accommodate the need from development where this not achievable within the envelope of the building. Such a programme could be implemented here as well, and secured through s106 legal agreement.
- Whilst the provision of amenity space in association to a residential property is a requirement, consideration of nearby green spaces, such as Phoenix Gardens, Soho Gardens and Bedford Square would be taken into account.
- In terms of accessibility, the new units should comply with the requirements as set out in Part M4(2) of Building regulations.
- In light of the above, further investigation of how additional residential uses can be accommodated here should be developed and discussed alongside the office space provision.
- A Wellness/amenity unit is proposed at ground floor level facing New Compton Street. This would increase activation on the street which is welcomed. More details about how this unit would function with the overall ground floor should be provided.
- An area labelled retail unit is proposed at ground level in the same location as the existing retail unit. The layout of this appears very similar to a lounge/bar area. Whilst a retail unit in this location would contribute to some level of activation to the street, more information about how this would operate would be useful to understand its viability.

- We would suggest you consider integrating on the corner of the building at ground floor, a use which attracts more footfall on St Giles Passage and New Compton Street, such as retail.

Social value

- We would expect the proposal to deliver areas of managed affordable workspace. Please clarify where these would be located.
- Up to 20 apprenticeships are mentioned to be supported by the scheme and prioritising local apprenticeships which is accepted. Also, provision of skills and training for local students, NEETs and unemployed are mentioned. We would expect these to be secured through participation in Council-led initiatives such as Good Work Camden.
- You should consider improving access to the building and around it, making the public realm more attractive, inclusive and permeable with particular reference to St Giles Passage and the rear of the site. Improvements to the green infrastructure across the building and in its surroundings should be considered.

Design and heritage

- The building is located next to Odeon Cinema, a Grade II listed building, separated by St Giles Passage. Although not located with a conservation area, it is sandwiched between Denmark Street Conservation Area to the northwest and Seven Dials Conservation Area to the southeast. The site forms a continuous front and rear elevation with nos 167 to 199 which have a prevailing height of 8 storeys. No 187, has 9 storeys and this faces a much higher density towards St Giles.

Scale and Massing

- The proposal is for the refurbishment and 3 storey extension of a 7 storey building facing Shaftesbury Avenue (excluding the tower feature and plant equipment). Overall, the additional mass at the top of the building is still challenging for the site, being considerably taller than its surrounding buildings and in relation to the existing host building.
- The reduction in mass through the additional 500mm setback at upper floors is not considered enough in reducing the impact of the additional mass, both in terms of townscape and visual prominence. The resulting height would still make the building much taller than the rest of the buildings on the street, currently at an average 8 storeys across the stretch along Shaftesbury Avenue, and would further unbalance the relationship with the listed Odeon building. You should consider a deeper setback of the upper levels.
- The proposal also removes the current angled elevation of floors 6, 7 and 8 at the rear and infills the spaces with additional mass, which roughly steps back every two floors.
- The impact on townscape is particularly relevant on the following views:

- Views 4 and 5 – from Stacey Street, Phoenix Street and Phoenix Gardens: these are views approaching the building from the ‘back’ where the additional bulk and height stands out in relation to adjacent buildings. The contrast in scale with the Odeon is especially noticeable in View 4. Currently the relationship between the existing building and Odeon is quite poor, and the proposal worsens this significantly.
- View 10 – from St Giles High St: this view is approaching the building from New Compton Street. In this view, the new infills and additional mass create a new building profile and are perceived as much larger than its neighbours, with impact on the uniformity of the terrace.
- You are advised to consider a more refined stepped approach to the infilling of the rear upper floors of the building, so that it is contextual to the other buildings within the row.
- Whilst there is a large and taller brick building at 125 Shaftesbury Avenue, this is set back from the various facades, and in particular from the Odeon, through a series of steps that mitigate the impact of the mass onto its surroundings. In contrast the current proposal infills the existing stepped approach as seen employed by the surrounding buildings which cumulatively, with the increase in height, results in a significantly harmful structure to the host building and neighbouring context.

Heritage

- The existing building is already big, and the proposals make this even more grand. We would expect a more modest addition in this context.
- Increasing the massing to the upper floors to the rear and in height would result in significant impact to the character of Phoenix Gardens and the community space and ‘less than substantial’ harm on the St Giles Church as seen from St Giles High Street, and St Giles Square.
- The proposed rear infill does not consider the granularity of the stepped upper floors of the building within the row.
- The relationship of the existing building with Odeon is poor and the proposal is causing more harm rather than reducing the existing impact.

Character and façade treatment

- The reduction of glazing on the facades is welcome.
- The proposed elevation treatment is developed around the principle of a base, a middle and a top and the proportions inspired by the surrounding buildings. Whilst these principles are welcome, the resulting façade composition presents a series of issues:
 - The proportions mainly reference the adjacent Odeon rather than the neighbouring buildings along Shaftesbury Avenue. This approach should be reviewed and reference the character of the buildings along the street of similar typology to the application site.
 - The overall perception and treatment is that of a grand building (including the effect of its additional bulk). It is considered that more

modest proportions are better suited for this building as it belongs to a continuous stretch of buildings.

- The façade hierarchy is unclear and lost with the various treatments adopted at different floors.
- The proposed ground floor treatment does not appropriately relate to its surroundings:
 - The building's three sides all have the same ground floor treatment, not responding to the character of each street: those of New Compton Street, Shaftesbury Avenue and St Giles Passage. We encourage you to address this by looking at scale, proportions, materiality and uses of each of these streets.
 - The ground floor is expressed as a double height space and this has an impact on the human scale and pedestrian experience. We recommend reducing the perceived scale of the ground floor by introducing horizontal elements or lowering the overall height to relate more to the ground floor scale of the surrounding buildings.
- At the second pre-app meeting, the design team explained it is not feasible to reuse and refurbish the existing concrete panels on the façade. The proposed development instead replaces the existing façade materials with a mix of brick and stone which reference materials used in the area. Whilst the use of these materials is not contested, we still encourage to find ways the existing façade materials could be re-used. If not directly relocated, they could for example be crushed and re-used as a new aggregate part of the new façade.
- The proposed extension is expressed in stone. Overall, together with the increase in mass, this material makes the building feel top-heavy.

Ground floor layout

- Overall, the ground floor layout has been improved in the updated design, with more active uses along each street frontage.
- This is particularly successful on the Compton Street side, where an amenity unit directly faces the street and replaces toilet units which were previously turning their back onto the street.
- The dedicated office entrance has also been moved from the corner of Shaftesbury Avenue and St Giles Passage towards Shaftesbury Avenue. This works better as it moves the office entrance from the corner and 'frees' it up. It was previously suggested that a more public use, such as retail (or other which attracts footfall) would be suitable for that corner space as it would relate to the retail uses along the street and potentially cater for the theatre's visitors.
- The revised internal arrangement of the main reception space and retail unit adjacent to it has improved as it locates more activity along Shaftesbury Avenue. Need to ensure there is the possibility to divide the retail unit into two or more smaller units in the future to ensure viability of the space.

Sustainability

- You should consider developing the scheme in line with the Sustainability pro-forma which you can find here [Sustainability statements in planning applications - Camden Council](#). In the event of a future planning application, you would be required to submit the pro-forma completed. This would help us and your team to understand where the scheme can be improved in terms of compliance with current targets.
- The proposed improvements to the energy efficiency of the building by reducing the areas of glazing are supported.
- In the submission and the pre-app discussion, mention was made of the standards to be achieved by the development as required by policy. More information about how these would be practically be achieved should be provided.
- An energy and cooling hierarchy is provided; however, this is very general in terms of what the scheme aspires to achieve. Please provide more information and practical representation in the design of the scheme of the elements which would reduce the heat entering the building.
- You should incorporate on-site renewables as part of the development. 20% reduction in carbon from onsite renewables would be required at Be Green stage. Integrating these in the design of the scheme early in the process would be beneficial long term.
- You would be required to submit a Sustainability Statement and demonstrate how the cooling hierarchy and energy hierarchy would be applied, in line with new London Plan policies.

Amenity

- A summary of a Daylight Sunlight assessment has been provided which states that from the buildings considered (45 New Compton Street, Pendrell House, 166 to 170 Shaftesbury Avenue), there are the following results: in terms of VSC, 86% of all windows tested (224 of 261) meet BRE guidelines; in terms of NSL daylight test, 79% of all rooms tested (70 of 104) meet BRE guidelines; in terms of APSH sunlight test, 91% of all window tested (210 to 230) meet BRE guidelines.
- For Pendrell House: 66% of windows (61 of 93) meet the initial VSC guidance, 55% of rooms (21 of 38) meet the initial NSL criteria and 78% windows (73 of 93) meet annual and winter APSH guidance. The impact appears significant here. As this is the residential building which would be likely affected the most, we would need detailed information in relation to the existing levels of daylight and sunlight and the results.
- Some information has been provided in relation to the overshadowing of The Phoenix Garden and Community Centre. BRE Guide states that 50% of an outdoor amenity space should achieve 2 hours sunlight on 21 March. The information provided shows the site divided into three areas and they each achieve over 2hrs sunlight on over 74% of the space. As the area would be used more in summer, you are advised to provide the overshadowing assessment on June 21st as well. Please provide the information as existing and proposed including extensions.

Recommendations

- More information should be provided in relation to the provision of additional residential use on site in response to policy H2.
- Full street elevation with proposed building are required so we are able to compare with the existing condition.
- Ground floor uses and activation should be further explored.
- As it stands the proposed additional massing would unbalance the host building, and the row of buildings it is part of, and result in harm to the host building, streetscene, neighbouring conservation areas, Phoenix Gardens to the rear, Odeon building and St Giles Church.
- The assessment on impact on amenity is not considered sufficiently robust to clarify that there would not be significant impact from the proposals.
- You should consider the above advice thoroughly prior to submitting any further revisions.