

Address:	<b>Selkirk House, 166 High Holborn,  1 Museum Street,  10-12 Museum Street,  35-41 New Oxford Street and  16A-18 West Central Street,  London  WC1A 1JR</b>		<b>1</b>
<b>Application Numbers:</b>	2023/2510/P	<b>Officer: David Fowler</b>	
<b>Ward:</b>	Holborn & Covent Garden		
<b>Date Received:</b>	15/06/2023		
<p><b>Proposal (planning application):</b>  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 part-demolition and refurbishment 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.</p>			
<p><b>Background Papers, Supporting Documents and Drawing Numbers:</b></p> <p>Existing plans:</p> <p>Site-wide  Location Plan 295_P10.001 B, Existing Site Plan 295_P10.002 B.</p> <p>1MS  Existing Second Basement Floor Plan 295_P10.098 B, Existing First Basement Floor Plan 295_P10.099 B, Existing Ground Floor Plan 295_P10.100 B, Existing First Floor Plan 295_P10.101 B, Existing Second Floor Plan 295_P10.102 B, Existing Third Floor Plan 295_P10.103 B, Existing Fourth Floor Plan 295_P10.104 B, Existing Fifth Floor Plan 295_P10.105 B, Existing Sixth Floor Plan 295_P10.106 B, Existing Seventh Floor Plan 295_P10.107 B, Existing Eighth Floor Plan 295_P10.108 B, Existing Ninth Floor Plan 295_P10.109 B, Existing Tenth Floor Plan 295_P10.110 B, Existing Eleventh Floor Plan 295_P10.111 B, Existing Twelfth Floor Plan 295_P10.112 B, Existing Thirteenth Floor Plan 295_P10.113 B, Existing Fourteenth Floor Plan 295_P10.114 B, Existing Fifteenth Floor Plan 295_P10.115 B, Existing Sixteenth Floor Plan 295_P10.116 B.</p> <p>West Central Street  Existing Basement Plan 295B_P10.179 B, Existing Ground Floor Plan 295B_P10.180 B, Existing First Floor Plan 295B_P10.181 B, Existing Second Floor Plan 295B_P10.182 B, Existing Third Floor Plan 295B_P10.183 B, Existing Fourth Floor Plan 295B_P10.184 B, Existing Roof Plan 295B_P10.185 B.</p>			

#### Site-wide elevations

Existing West Central Street Elevation North 295\_P10.200 B, Existing West Central Street Elevation South 295\_P10.201 B, Existing West Central Street Elevation West 295\_P10.202 B, Existing West Central Street Elevation East 295\_P10.203 B, Existing Museum Street Elevation 295\_P10.204 B, Existing High Holborn Elevation 295\_P10.205 B, Existing New Oxford Street Elevation 295\_P10.206 B.

#### Demolition drawings

Demolition Site Plan 295\_P10.300 B, Demolition Plan - Basement Floor 295B\_P10.300 B, Demolition Plan - Ground Floor 295B\_P10.301 B, Demolition Plan - First Floor 295B\_P10.302 B, Demolition Plan - Second Floor 295B\_P10.303 B, Demolition Plan - Third Floor 295B\_P10.304 B, Demolition Plan - Fourth Floor 295B\_P10.305 B, Demolition Plan - Roof 295B\_P10.306 B, Demolition Elevations - Museum Street & New Oxford Street 295B\_P10.400 B, Demolition Elevations - West Central Street 295B\_P10.401 B, Demolition Elevations - Courtyard 295B\_P10.402 B.

#### Proposed plans:

##### Site-wide

Proposed Site Plan 295\_P20.003 B, Proposed Landscape GA Plan 295\_P20.006 C, Proposed Landscape Paving Plan - Kerb Types 295\_P20.010 C, Proposed Levels and Drainage Intent Plan 295\_P20.011 C, Proposed Furniture Plan 295\_P20.012 C, Proposed Second Basement Plan 295\_P20.098 B, Proposed First Basement Plan 295\_P20.099 B, Proposed Ground Floor Plan 295\_P20.100 C, Proposed First Floor Plan 295\_P20.101 D, Proposed Second Floor Plan 295\_P20.102 C, Proposed Third Floor Plan 295\_P20.103 C, Proposed Forth Floor Plan 295\_P20.104 C, Proposed Fifth Floor Plan 295\_P20.105 B, Proposed Sixth Floor Plan 295\_P20.106 B, Proposed Seventh Floor Plan 295\_P20.107 B, Proposed Eighth Floor Plan 295\_P20.108 B, Proposed Ninth Floor Plan 295\_P20.109 B, Proposed Tenth Floor Plan 295\_P20.110 B, Proposed Eleventh Floor Plan 295\_P20.111 B, Proposed Twelfth Floor Plan 295\_P20.112 B, Proposed Thirteenth Floor Plan 295\_P20.113 B, Proposed Fourteenth Floor Plan 295\_P20.114 B, Proposed Fifteenth Floor Plan 295\_P20.115 B, Proposed Sixteenth Floor Plan 295\_P20.116 B, Proposed Seventeenth Floor Plan 295\_P20.117 B, Proposed Eighteenth Floor Plan 295\_P20.118 B, Proposed Roof Plan 295\_P20.121 B.

##### 1MS

1MS - Proposed Ground Floor Plan 295A\_P20.130 C, 1MS - Proposed First Floor Plan 295A\_P20.131 C, 1MS - Proposed Second Floor Plan 295A\_P20.132 B, 1MS - Proposed Third Floor Plan 295A\_P20.133 B, 1MS - Proposed Fourth Floor Plan 295A\_P20.134 B, 1MS - Proposed Fifth Floor Plan 295A\_P20.135 B, 1MS - Proposed Sixth Floor Plan 295A\_P20.136 B, 1MS - Proposed Seventh Floor Plan 295A\_P20.137 B, 1MS - Proposed Eighth Floor Plan 295A\_P20.138 B, 1MS - Proposed Ninth Floor Plan 295A\_P20.139 B, 1MS - Proposed Tenth Floor Plan 295A\_P20.140 B, 1MS - Proposed Eleventh Floor Plan 295A\_P20.141 B, 1MS - Proposed Twelfth Floor Plan 295A\_P20.142 B, 1MS - Proposed Thirteenth Floor Plan 295A\_P20.143 B, 1MS - Proposed Fourteenth Floor Plan 295A\_P20.144 B, 1MS - Proposed Fifteenth Floor Plan 295A\_P20.145 B, 1MS - Proposed Sixteenth Floor Plan 295A\_P20.146 B, 1MS - Proposed Seventeenth Floor Plan 295A\_P20.147 B, 1MS - Proposed Eighteenth Floor Plan 295A\_P20.148 B, 1MS - Proposed Roof Plan 295A\_P20.151 B, 1MS - Level 8

Landscape Terrace Plan 295A\_P20.181 B, 1MS - Level 11 Landscape Terrace Plan 295A\_P20.182 B,

#### Vine Lane Building

Vine Lane Building - Proposed Ground Floor Plan 295A\_P20.160 B, Vine Lane Building - Proposed First Floor Plan 295A\_P20.161 B, Vine Lane Building - Proposed Second Floor Plan 295A\_P20.162 B, Vine Lane Building - Proposed Third Floor Plan 295A\_P20.163 C, Vine Lane Building - Proposed Fourth Floor Plan 295A\_P20.164 B, Vine Lane Building - Proposed Fifth Floor Plan 295A\_P20.165 B, Vine Lane Building - Proposed Roof Plan 295A\_P20.166 B,

#### High Holborn Building

High Holborn - Proposed Ground and First Floor Plan 295A\_P20.170 B, High Holborn - Proposed Second and Third Floor Plan 295A\_P20.171 B, High Holborn - Proposed Fourth Floor and Fifth Plan 295A\_P20.172 B, High Holborn - Proposed Roof Plan 295A\_P20.173 B,

#### West Central Street

General Arrangement: Proposed Basement Floor Plan 295B\_P20.179 B, General Arrangement: Proposed Ground Floor Plan 295B\_P20.180 B, General Arrangement: Proposed First Floor Plan 295B\_P20.181 B, General Arrangement: Proposed Second Floor Plan 295B\_P20.182 B, General Arrangement: Proposed Third Floor Plan 295B\_P20.183 B, General Arrangement: Proposed Fourth Floor Plan 295B\_P20.184 B, General Arrangement: Proposed Fifth Floor Plan 295B\_P20.185 B, General Arrangement: Proposed Roof Plan 295B\_P20.186 B, West Central Street - First Floor Landscape Plan 295B\_P20.121 B.

#### Landscape plans:

Open Space & Amenity Space: Proposed Ground Floor Plan 295\_P20.190, Open Space & Amenity Space: Proposed First Floor Plan 295\_P20.191, Open Space & Amenity Space: Proposed Fourth Floor Plan 295\_P20.192, Open Space & Amenity Space: Proposed Eighth Floor Plan 295\_P20.193, Open Space & Amenity Space: Proposed Eleventh Floor Plan 295\_P20.194, Open Space & Amenity Space: Proposed Eighteenth Floor Plan 295\_P20.195.

#### Proposed site-wide elevations

Proposed West Central Street Elevation North 295\_P30.100 B, Proposed West Central Street Elevation South 295\_P30.101 C, Proposed West Central Street Elevation West 295\_P30.102 B, Proposed West Central Street Elevation East 295\_P30.103 C, Proposed Museum Street Elevation 295\_P30.104 C, Proposed High Holborn Elevation 295\_P30.105 C, Proposed New Oxford Street Elevation 295\_P30.106 C.

#### Proposed elevations – 1MS

Proposed West Central Street Elevation – South 295A\_P30.110 C, Proposed Museum Street Elevation 295A\_P30.111 C, Proposed High Holborn Elevation 295A\_P30.112 C, Proposed Vine Lane Elevation 295A\_P30.113 C, Proposed West Central Street Elevation – South 295A\_P30.110 C, Proposed Museum Street Elevation 295A\_P30.111 C, Proposed High Holborn Elevation 295A\_P30.112 C, Proposed Vine Lane Elevation 295A\_P30.113 C.

#### Proposed elevations – Vine Lane Building

Proposed Vine Lane/West Central Street Elevation 295A\_P30.120 B, Proposed Vine Lane (Crank) & South Elevation 295A\_P30.121 B, Proposed West Elevation 295A\_P30.122 C, Proposed North Elevation 295A\_P30.123 B.

Proposed elevations – High Holborn Building  
Proposed Vine Lane and South Elevation 295A\_P30.130 C, Proposed High Holborn and West Elevation 295A\_P30.131 A.

Proposed elevations – West Central Street  
Museum Street & New Oxford Street Elevations 295B\_P30.140 B, West Central Street Elevations 295B\_P30.141 B, Courtyard Elevations - Sheet 1 295B\_P30.142 B, Courtyard Elevations - Sheet 2 295B\_P30.143 B.

Proposed site sections  
Proposed Site Section AA 295\_P40.001 C, Proposed Site Section BB 295\_P40.002 C.

Proposed landscape and public realm sections  
Proposed Site Section/Elevation AA-BB 295\_P40.005 C, Proposed Site Section/Elevation CC 295\_P40.006, Proposed Site Section/Elevation DD 295\_P40.007 C, Proposed Street Sections EE-FF 295\_P40.008 C, Proposed Street Sections GG-HH-JJ 295\_P40.009 B.

Proposed sections – 1MS  
1MS Proposed Section AA and BB 295A\_P40.101 C, 1MS Proposed Section CC and DD 295A\_P40.102 C, 1MS - 8th Terrace Landscape Sections 295A\_P40.011 B, 1MS - 11th Terrace Landscape Sections 295A\_P40.012 B.

Proposed sections Vine Lane Building  
Proposed Section AA 295A\_P40.110 B, Proposed Section BB CC 295A\_P40.111 B.

Proposed section – High Holborn  
Proposed Section AA and BB 295A\_P40.120 B.

Proposed sections – West Central Street  
Proposed Section AA 295B\_P40.100 B, Proposed Section BB 295B\_P40.101 B.

Documents: Covering letter (Iceni) 13 June 2023, Planning Statement (June 2023) Iceni Projects, Design and Access Statement (June 2023) DSDHA, Noise and Vibration Impact Assessment (June 2023) Scotch Partners, Health Impact Assessment (October 2023) Iceni Projects, Socio-Economic Statement (June 2023) Iceni, Crime Impact Assessment (June 2023) prepared by Hurley Palmer Flatt, Basement Impact & Structural Impact Assessment (2023) A-Squared Studio, Internal Daylight, Sunlight and Overshadowing Assessment (June 2023) GIA, Daylight and Sunlight Assessment (June 2023) GIA, Internal Daylight, Sunlight and Overshadowing Assessment (June 2023) GIA, Arboricultural Assessment (June 2023) Tim Moya Associates, Fire Statement (June 2023) OFR, Affordable Housing Financial Viability Assessment (2023) prepared by Gerald Eve, Addendum to Financial Viability Assessment (June 2023) Gerald Eve, Affordable Housing Statement (June 2023) Gerald Eve, Heritage, Townscape and Visual Impact Assessment (June 2023) The Townscape Consultancy, Environmental Wind Planning Report (June 2023) Arup; Site Waste Management Plan Construction Phase (June 2023) prepared by Arup, Site Waste Management Plan Demolition Phase,

prepared by Arup, Air Quality Assessment (June 2023) Arup, Archaeological Assessment (June 2023) Arup, Construction Management Plan (June 2023) Arup, Delivery and Servicing Management Plan (June 2023) Arup, Demolition Environmental Management Plan (June 2023) Arup, Flood Risk Assessment (June 2023) Arup, Hotel Needs Assessment (May 2023) Icen, Air Quality – Technical Note (23 June 2023) Arup, Circular Economy Statement (June 2023) Scotch Partners, Energy Assessment (June 2023) Scotch Partners, Statement of Community Involvement (June 2023) LCA, Sustainability Statement (June 2023) Scotch Partners, Whole Life Carbon Comparison (June 2023) DSDHA & Scotch Partners, 1 Museum Street – Selkirk House Retention & Redevelopment Options Review and WLC Comparison Addendum (20/09/2023) Scotch Partners, One Museum Street - Selkirk House Retention & Redevelopment Options Review & WLC comparison (July 2023) DSDHA, Survey Statement (25<sup>th</sup> September 2023) Gardiner & Theobald, Whole Life Carbon Addendum Rev 01 (19/09/23) Scotch Partners, Pre-Demolition Audit Issue 2 (25 September 2023) Arup, Below Ground Drainage Strategy (June 2023) HTS, Ecology Statement (June 2023) Biodiversity by Design, Framework Travel Plan (June 2023) Arup, Listed Building Consent Structural Report - prepared by HTS, Listed Building Heritage Statement (June 2023) The Townscape Consultancy, Statement of Developer Contributions (June 2023) Icen Projects, Transport Assessment (June 2023) Arup, Detailed Schedule of Works (June 2023) DSDHA, Air Quality Technical Note (11 October 2023) Arup.

**RECOMMENDATION SUMMARY:**

**Grant conditional planning permission following:**

- (i) Referral to Mayor of London for his direction;**
- (ii) Finalisation of detailed wording for conditions following consultation with the Mayor; and**
- (iii) Completion of Section 106 Legal Agreement.**

**Applicant:**

Lab Selkirk House Ltd

**Agent:**

Icen Projects

Address:	<b>Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street, London WC1A 1JR</b>		<b>2</b>
<b>Application Numbers:</b>	2023/2653/L	<b>Officer: David Fowler</b>	
<b>Ward:</b>	Holborn & Covent Garden		
<b>Date Received:</b>	15/06/2023		
<p><b>Proposal (listed building consent application):</b>  Alterations, including part-demolition, to 10-12 Museum Street and 35 and 37 New Oxford Street, to provide flats and townhouses. Demolition of closet wing to 10 Museum Street, infill of door openings. Demolition of modern rear extension to 11-12 Museum Street from ground to third floors, rebuilding of rear wall. Removal of non-original staircase and internal walls to 11-12 Museum Street along with new layouts and thermal upgrades including internal wall insulation, to facilitate new flats. New bridge links to 12 Museum Street from 16a-18 West Central Street. Removal of non-original partition walls to 35 and 37 New Oxford Street, reinstatement of historic room layouts, thermal upgrades. Across listed buildings: New kitchens, bathrooms and sanitaryware; Introduction of slimline double-glazed retrofit vacuum glazing to existing window joinery, limited replacement frames; New internal and external doors; Façade refurbishment works; Conservation and restoration of historic joinery, plasterwork, fireplaces and other features of heritage importance. Courtyard garden linking buildings at first floor level above ground floor shared services, with new and amended openings to listed buildings to provide access. New and restored retail frontages to all buildings.</p>			
<p><b>Proposal (Listed building consent application):</b>  Alterations, including part-demolition, to 10-12 Museum Street and 35 and 37 New Oxford Street, to provide flats and townhouses. Demolition of closet wing to 10 Museum Street, infill of door openings. Demolition of modern rear extension to 11-12 Museum Street from ground to third floors, rebuilding of rear wall. Removal of non-original staircase and internal walls to 11-12 Museum Street along with new layouts and thermal upgrades including internal wall insulation, to facilitate new flats. New bridge links to 12 Museum Street from 16a-18 West Central Street. Removal of non-original partition walls to 35 and 37 New Oxford Street, reinstatement of historic room layouts, thermal upgrades. Across listed buildings: New kitchens, bathrooms and sanitaryware; Introduction of slimline double-glazed retrofit vacuum glazing to existing window joinery, limited replacement frames; New internal and external doors; Façade refurbishment works; Conservation and restoration of historic joinery, plasterwork, fireplaces and other features of heritage importance. Courtyard garden linking buildings at first floor level above ground floor shared services, with new and amended openings to listed buildings to provide access. New and restored retail frontages to all buildings.</p>			
<p><b>Background Papers, Supporting Documents and Drawing Numbers:</b>  Existing plans – site wide:</p>			

## Location Plan 295\_P10.001

### Existing plans – WCS:

Existing Basement Plan 295B\_P10.189, Existing Ground Floor Plan 295B\_P10.190, Existing Mezzanine Plan 295B\_P10.191, Existing First Floor Plan 295B\_P10.192, Existing Second Floor Plan 295B\_P10.193, Existing Third Floor Plan 295B\_P10.194, Existing Roof Plan 295B\_P10.195, Existing Elevation - Museum Street & New Oxford Street 295B\_P10.210, Existing Elevation - West Central Street 295B\_P10.211, Existing Elevation – Courtyard 295B\_P10.212, Existing Site Section AA 295B\_P10.250, Existing Site Section BB 295B\_P10.251, Existing Shopfront Elevations - Sheet 1 295B\_P10.270 Existing Shopfront Elevations - Sheet 2 295B\_P10.271.

### Demolition drawings – WCS:

Demolition Plan - Basement Floor 295B\_P10.309, Demolition Plan - Ground Floor 295B\_P10.310, Demolition Plan - Mezzanine Floor 295B\_P10.311, Demolition Plan - First Floor 295B\_P10.312, Demolition Plan - Second Floor 295B\_P10.313, Demolition Plan - Third Floor 295B\_P10.314, Demolition Plan – Roof 295B\_P10.315, - Demolition Elevations - Museum Street & New Oxford Street 295B\_P10.410, Demolition Elevations - West Central Street 295B\_P10.411, Demolition Elevations – Courtyard 295B\_P10.412.

### Proposed plans – WCS:

General Arrangement: Proposed Basement Floor Plan 295B\_P20.189, General Arrangement: Proposed Ground Floor Plan 295B\_P20.190, General Arrangement: Proposed First Floor Plan 295B\_P20.191, General Arrangement: Proposed Second Floor Plan 295B\_P20.192, General Arrangement: Proposed Third Floor Plan 295B\_P20.193, General Arrangement: Proposed Roof Plan 295B\_P20.194, West Central Street - First Floor Landscape Plan 295A\_P20.125,

### Proposed elevations – WCS:

Museum Street & New Oxford Street Elevations 295B\_P30.150, West Central Street Elevations 295B\_P30.151, Courtyard Elevations - Sheet 1 295B\_P30.152, Courtyard Elevations - Sheet 2 295B\_P30.153.

### Proposed sections – WCS:

Proposed Section AA 295B\_P40.130, Proposed Section BB 295B\_P40.131.

### Proposed external wall details – WCS:

Proposed External Wall Details - Sheet 1 295B\_P50.100, Proposed External Wall Details - Sheet 2 295B\_P50.101.

### Proposed shopfront elevations:

Proposed Shopfront Elevations - Sheet 1 295B\_P30.200, Proposed Shopfront Elevations - Sheet 2 295B\_P30.201.

### Proposed internal elevations:

Proposed Internal Elevations - Sheet 1 295B\_P60.100, Proposed Internal Elevations - Sheet 2 295B\_P60.101

## **RECOMMENDATION SUMMARY:**

**Grant conditional listed building consent.**

<b>Applicant:</b>	<b>Agent:</b>
Lab Selkirk House Ltd	Iceni Projects



## ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (GIA sqm)
Existing	Class C1 - Hotel		9,292
	Sui Generis – Public car park		8,037
	Class E – Commercial, Business and Services		1,126
	Sui Generis - Hot food takeaway		190
	Sui Generis - Nightclub		994
	Class C3 - Residential		1,817
	Class C4 – House in Multiple Occupation (HMO)		97
	<b>EXISTING TOTAL</b>		<b>21,553</b>
Proposed	Class E(g) - Offices		22,650
	Class E (excluding Class E(g) – Commercial, businesses and services (ground floor)		1,667
	Class C3 - Residential		3,992
	<b>PROPOSED TOTAL</b>		<b>28,309</b>

Existing Residential Use Details:					
	Residential Type	No. of Bedrooms per Unit			
		1	2	6	Total
Market	Flat	23	8	-	<b>31</b>
HMO	Flat	-	-	1	<b>1</b>
<b>TOTAL – All</b>	<b>Flats</b>				<b>32</b>

Proposed Residential Use Details:							
	Residential Type	No. of Bedrooms per Unit					Total
		1	2	3	4	5	
Market	Flat	19	3	3			<b>25</b>
Affordable (Social rent)	Flat	4	6		1	1	<b>12</b>
Affordable (Intermediate)	Flat	7					<b>7</b>
<b>TOTAL – All</b>	<b>Flats</b>	<b>30</b>	<b>9</b>	<b>3</b>	<b>1</b>	<b>1</b>	<b>44</b>

### Parking Details:

	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	228	0
Proposed	0	1 (on street)

## **OFFICERS' REPORT**

**Reason for Referral to Committee:** Major development involving the construction of more than 10 new dwellings or more than 1000 sq. metres of non-residential floorspace [clause 3(i)];

**Reason for Referral to Mayor:** This application is referable to the Mayor of London under the provisions of Category 1C of the Schedule to the Town & Country Planning (Mayor of London) Order 2008: "Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London".

Once Camden has resolved to determine the application, it is required to refer it back the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

## **EXECUTIVE SUMMARY**

The application is a mixed use development, demolishing a number of buildings across the site (including the Travelodge 'Selkirk House' as well as some positive contributors) to provide offices, residential and flexible town centre Class E use at ground floor. In total, the application proposes 24,317sqm of non-residential floorspace comprising 22,650sqm Class E(g)(i) office and 1,667sqm of flexible town centre uses Class E(g)(i); and 3,992sqm of residential floorspace. The proposals feature a floorspace uplift of 6,659sqm in total. The proposed tower building is 19 storeys, and is taller than the existing 17 storey tower by 20m. Significant objection has been raised to the proposals from the local community, the main areas of concern are (but not exclusively) the loss of existing buildings in sustainability terms and the impact of the proposals in terms of heritage and amenity.

The loss of existing hotel is accepted, given the number and supply of hotel rooms in the area and that the hotel was ancillary to another hotel and is vacant. The loss of the multi-storey car park is welcomed in sustainability, land use and design terms. The proposed office use is strongly welcomed and will bring economic, employment and training benefits to the area. The provision of residential use and especially affordable housing is strongly welcomed, as Camden's priority land use. The ground floor would be activated with Class E retail and food and beverage (F&B) uses. The overall land use package is welcomed.

44 flats are proposed. The policy requirement for affordable housing would be met on the site, which is strongly welcomed in this location. The proposed flats would provide a good standard of living in terms of unit size, external amenity space and outlook. The internal daylight/sunlight standards are considered acceptable given this dense and highly central urban location.

The West Central Street block is located within the Bloomsbury Conservation Area and includes a number of Grade II listed buildings. Conservation areas are located around the site, as are numerous listed buildings. The proposals would cause less than substantial harm, at the middle end of the scale in regards the demolition of 16a and 18 West Central Street. The proposed replacement tower block and associated increase in height would also bring less than substantial harm to designated heritage

assets, ranging from the lower end of the scale in regard to some listed buildings, to the middle end of the scale in regards the impact on the Bloomsbury Conservation Area and the non-designated heritage assets that are proposed for demolition. Less than substantial harm is caused to the setting of some of the listed buildings by the extensions and infill proposed around them and there are further impacts on the conservation area and some listed buildings in the area from visibility of the tower in wider views. When considering the impact of a proposed development on the significance of a designated heritage asset, national policy provides that great weight should be given to the asset's conservation and any harm requires clear and convincing justification. As there is less than substantial harm caused to the significance of designated and non-designated heritage assets (the positive contributors proposed to be demolished on the site), in accordance with para 202 of the NPPF this harm is weighed against the public benefits of the proposals in reaching a decision.

The effects of the proposal in urban design terms, however, are positive. The design creates an open, publicly accessible, mixed use ground plane with active ground floor frontages, newly shaped public spaces and a new route connecting West Central Street and High Holborn. The proposed buildings on West Central Street and Vine Lane tie the proposals into its context repairing existing urban blocks and creating a cohesive and coherent townscape that would make a positive contribution to the surrounding streets. The high-quality architecture demonstrated through its composition and detailing has been well considered. The proposals would deliver significant public realm benefits, including a new route through between West Central Street and High Holborn.

The scheme has been designed to minimise the impact on neighbouring properties in terms of loss of daylight, sunlight and privacy.

The proposed development would involve substantial demolition of Selkirk House – retaining only the basements, as well as the demolition of buildings on West Central Street. However, the only parts of Selkirk House that could, in principle, be retained (floors 4-13) comprise just 25% of the overall structure (by weight). Demolishing the lower floors would mean it was very difficult and costly to retain the structure above. Officers have considered whether retention of the buildings should be required, but accept that to do so would require substantial works to bring the building up to modern hotel standards, or to convert to residential, particularly in terms of meeting fire safety standards. The comprehensive redevelopment of Selkirk House (except for the basements) allows the most efficient use of the land, in accordance with the NPPF, and would allow for the delivery of other benefits such as a new public route and improved ground floor environment. Officers are satisfied with the proposed development in terms of sustainability and energy use.

The scheme would deliver substantial land use, employment and economic benefits, including housing and affordable housing. The design of the new buildings is high-quality architecture. The public realm improvements and new route are also substantial benefits. Taking account of the policies of the development plan and all material planning considerations, including the representations made by local residents, the proposals are considered acceptable, the less than substantial harm to heritage assets which has been identified is outweighed by public benefits and it is therefore recommended that planning permission be granted.



# 1 SITE

- 1.1 The site is located in the area historically known as St. Giles, which is located between Covent Garden, Holborn and Bloomsbury. The site consists of the majority of one urban block and parts of another adjacent urban block, which have West Central Street running between them.

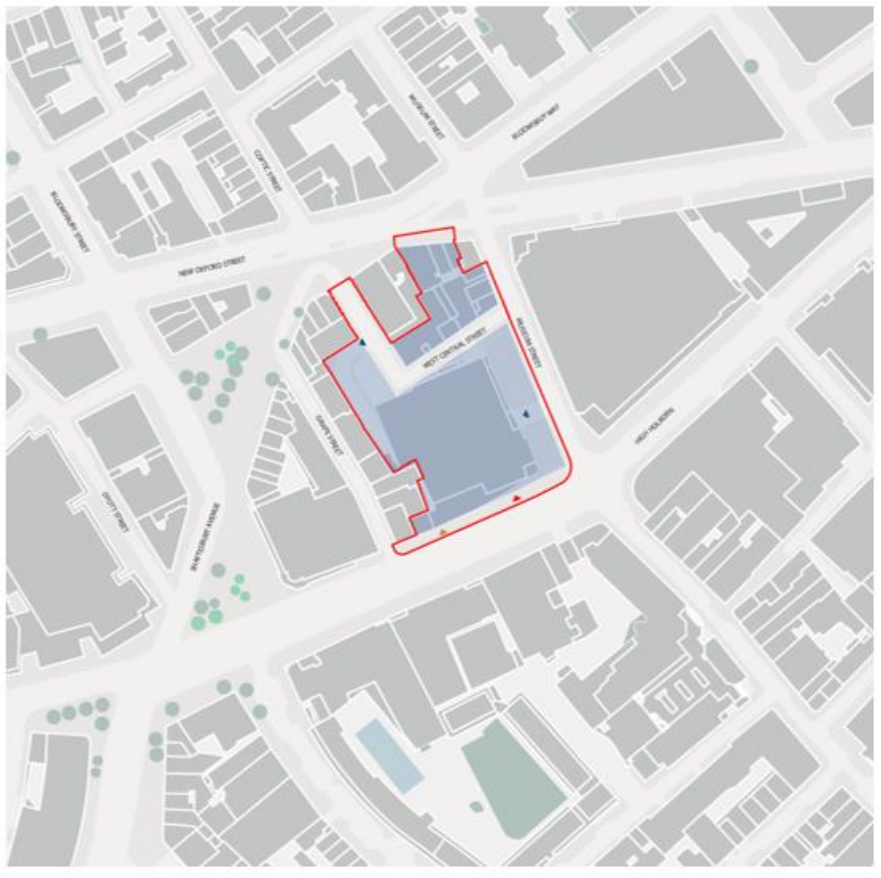


Figure 1 – The site

- 1.2 The southern block is occupied by Selkirk House, which consists of 17 storeys (53.6m above ground, 78.6m AOD) plus two basement levels and a further partial basement level and is vacant at present. Selkirk House was built in the 1960s for office purposes, with an NCP car park on the lower floors. The building was last used as a Travelodge Hotel, with self-contained Class C3 flats at the top on the 14<sup>th</sup> and 15<sup>th</sup> floors and the NCP car park (which has come back in to use recently), which occupied the basement floors up to the second floor. This block includes an area of redundant hardstanding on the corner of West Central Street. The Selkirk House block is bounded by West Central Street to the north, Museum Street to the east, High Holborn to the south and the rear of properties fronting Grape Street, to the west. This block includes a large area of public realm on Museum Street.
- 1.3 The northern block, referred to as the West Central Street (WCS) block from hereon, consists of three buildings fronting New Oxford Street, the southern part of the block fronting Museum Street and the southern portion of West Central Street. The ground floors of the WCS block are predominantly in Class E use,

mainly retail. The basement, first and second floors of 39-41 New Oxford Street are in office use. The upper floors of 35-37 New Oxford Street are in residential use. The rest of the northern block, outside of the application site, feature a mixture of commercial and residential, including the Old Crown pub on the corner of Museum Street and New Oxford Street.

- 1.4 To the east of the site, across Museum Street, lies the Post Building (see History). To the south, across High Holborn, the uses are predominantly commercial, plus student accommodation. To the west, the buildings along Grape Street are predominantly commercial at ground floor with a mixture of residential and commercial on the upper floors. Beyond Grape Street, public realm works are being carried out at Princes Circus, in connection with the West End Project. To the north, on New Oxford Street, there are commercial uses at ground floor with a mixture of commercial and residential on the upper floors.
- 1.5 The northern block on the site (the West Central Street block) lies within the Bloomsbury Conservation Area, which borders the western part of the whole site also.
- 1.6 Within the site there are eight Grade II listed buildings dating from the 1840s (10-12 Museum Street, 11-12; 35 and 37 New Oxford Street, 43 and 45 New Oxford Street, and 16 West Central Street). The buildings in the West central Street block of the application site that are not listed are considered Non-Designated Heritage Assets as they contribute positively both to the character and appearance of the conservation area. These are 39-41 New Oxford Street, 16A, 16B & 18 West Central Street, which also date from the 1840s with the exception of 39-41 (built 1847, rebuilt 1927).

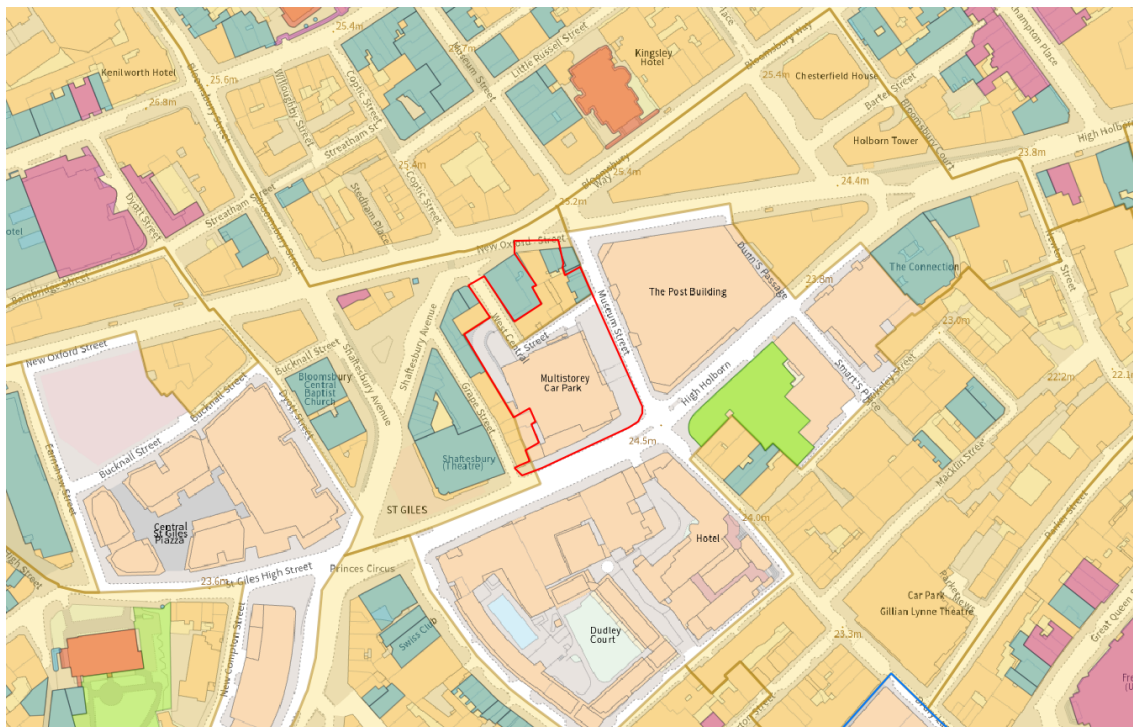


Figure 2 – Conservation Areas on and around the site (Bloomsbury covering the northern part of the site and the area to the north and west, and Seven Dials to the south and southeast)

- 1.7 Within the city block (but outside of the site boundary) is The Old Crown, 33 New Oxford Street, which has also recently been listed Grade II. There are a large number of listed buildings within the vicinity of the site. Most significant of these are The British Museum, the Church of St. George, and Bedford Square which all sit to the north of the site; the buildings are listed Grade I, the garden square is listed Grade II\* on the Register of Historic Parks and Gardens.
- 1.8 In the wider setting of the application site are several significant buildings, including Somerset House and the Palace of Westminster.
- 1.9 The site lies within the Tottenham Court Road Growth Area and is the last big development site in the area, following other substantial developments including Central St Giles, Post Building, Outernet/Denmark Street and Castlewood House.
- 1.10 On a key axis taking people from Covent Garden to the British Museum, it is identified in the emerging Holborn Vision and Urban Strategy as a site that can deliver improved public realm and facilitate increased footfall in the area due to the arrival of the Elizabeth Line.
- 1.11 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). Holborn (London Underground) and Tottenham Court Road (London Underground and Elizabeth Line) stations are located approximately 350 metres east and 470 metres west of the site (circa 5-10 minute walk). Other London Underground stations are located nearby, including Covent Garden which is located 660 metres to the southwest. In addition, bus stops serving various bus routes are located nearby on Bloomsbury Street, Great Russell Street, Kingsway, and New Oxford Street.

## **2 THE PROPOSAL**

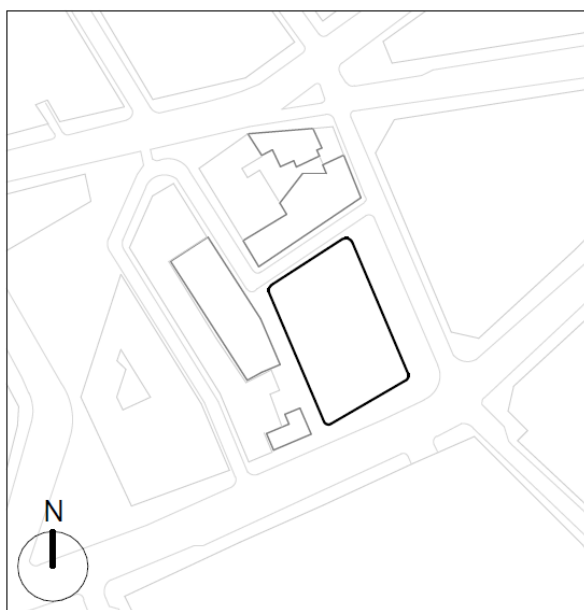
- 2.1 The application is a mixed use development, demolishing a number of buildings across the site (including the Travelodge 'Selkirk House' as well as some positive contributors) to provide offices, residential and flexible town centre Class E use [excluding offices Class E (g) (i)] at ground floor. In total, the application proposes 24,317sqm of non-residential floorspace comprising 22,650sqm Class E(g)(i) office and 1,667sqm of flexible town centre uses [excluding Class E(g)(i)]; and 3,992sqm of residential floorspace. This being a floorspace uplift of 4,678sqm non-residential and 2,078sqm residential.





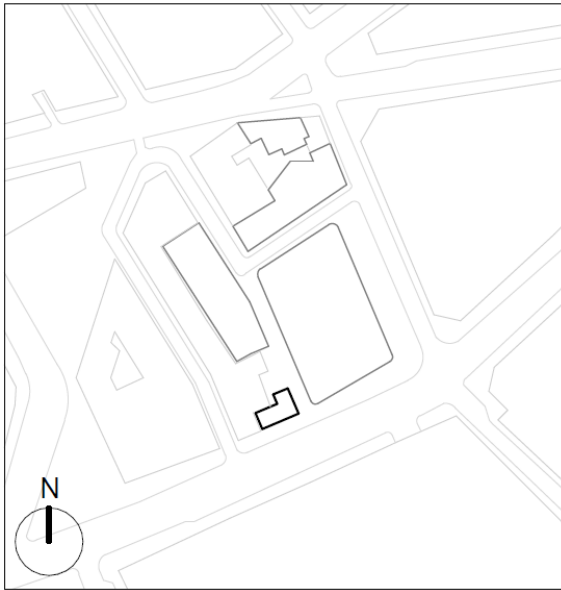
Figure 3. Different buildings in the proposal

- 2.2 The 17-storey Selkirk House (the hotel, flats and car park) would be demolished, with the basement levels retained. A new building would be erected on this part of the site, the tallest part of which would consist of **19 storeys** (99m AOD/73.95m above ground level). This building would accommodate flexible Class E town centre uses (i.e. excluding office use) at ground floor level with 22,650sqm of offices (Class E(g)(i)) at ground floor level and on the upper storeys. .



Figur 4. Footprint of proposed office building

- 2.3 A new route would be created through from West Central Street heading southwards to connect with High Holborn and would be called Vine Lane (name would need to be confirmed with street name and numbering if the scheme is approved and implemented).
- 2.4 On the western side of the end of the new Vine Lane, a **six-storey** building would be erected fronting High Holborn, which would accommodate flexible town centre Class E uses at ground floor (with the exception of offices Class E (g) (i)) and Class C3 residential above, comprising 19 market dwellings (16 x 1 bedroom and 3 x 2 bedrooms).



*Figure 5. Footprint of proposed High Holborn block*

- 2.5 On the western side of Vine Lane and West Central Street, a **five-storey building** - the High Holborn block would be erected. This block would provide flexible town centre Class E use (with the exception of offices Class E (g) (i)) at ground floor and Class C3 residential above, comprising four market dwellings (3 x 1 bedroom and 1 x 4 bedroom) .

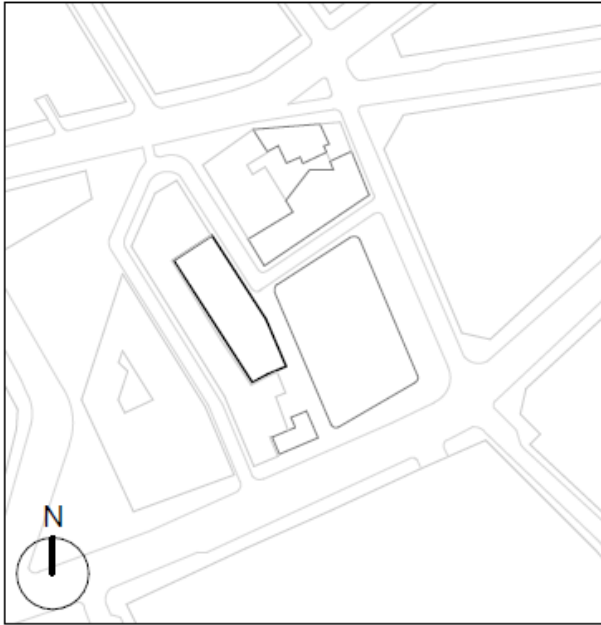


Figure 6. Footprint of proposed Vine Lane block

- 2.6 With regards the WCS block, 16a, 16b and 18 West Central Street (2-storey former nightclub building) would be demolished and replaced by two buildings consisting of **six storeys**, providing flexible town centre Class E uses at ground floor and Class C3 residential above. The residential element would comprise 21 dwellings; social rented 4 x 1 bedroom, 6 x 2, 1 x 4 and 1 x 5; intermediate 7 x 1 and 1 x 3; market 1 x 3 bedroom. The properties at 35, 37 and 39-41 New Oxford Street and 10 and 11-12 Museum Street would be refurbished and also have Class E town centre uses at ground floor with Class C3 residential above.

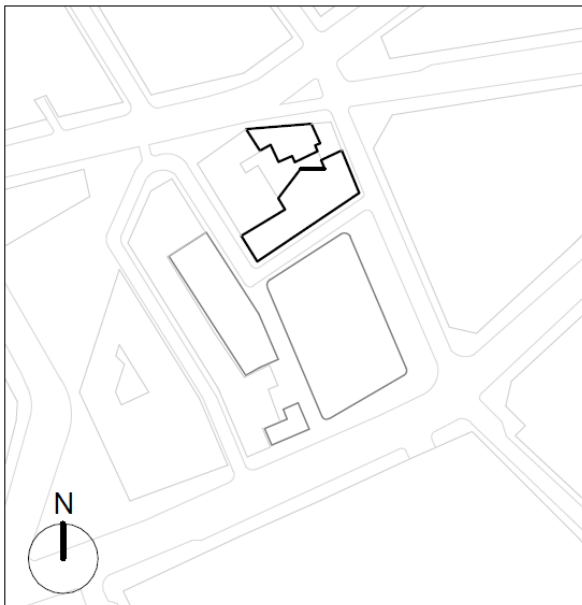


Figure 7. Footprint of retained and proposed buildings in West Central Street block



2021/2954/P - Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street

*“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.”*

**Withdrawn (following the listing of some buildings on the site) – 27/06/2023.**

2016/0477/P - 35 - 41 New Oxford Street, 10-12 Museum Street, 16A-18 West Central Street

*“Refurbishment and extension of the site to provide a mixed use scheme which includes 19 self-contained units (6 x 1 bed and 11 x 2 bed and 2 x 3 bed), flexible A1/ A2/ A3 uses and/or B1 and/or D1 at basement and ground floor levels and associated works.”*

**Granted 16/05/2017.**

PSX0204780 – Selkirk House, 166 High Holborn

*“Change of use from offices (Class B1) to a 184-bed hotel (Class C1) and to a ground floor restaurant (Class A3) and associated elevational alterations.”*

**Granted 20/04/2005.**

- 3.2 The following planning history is relevant with regards sites near to the application site:

2014/5946/P – 21-31 New Oxford Street – aka The Post Building

*“Remodelling, refurbishment and extension of existing former postal sorting office (Sui-generis use), including formation of a new public roof terrace, private terraces, wintergardens, roof top plant and new entrances in connection with the change of use of the building to offices (Class B1), retail/restaurant/doctors' surgery uses (Classes A1/A3/D1) and 21 affordable housing units (Class C3), along with associated highway, landscaping, and public realm improvement works.”*

**Granted – 30/03/2015.**

## 4 CONSULTATION SUMMARY

4.1 A site visit took place on the 4<sup>th</sup> of November 2023 with members of the Planning Committee and planning officers. All Planning Committee members were invited and the following members attended:

- Councillor Frondigoun,
- Councillor Johnson,
- Councillor Martin-Lane,
- Councillor Simon,
- Councillor Vincent.

### **Statutory Consultees and national groups**

#### 4.2 **Greater London Authority (GLA)**

- Land use – the loss of visitor accommodation and the principle of redevelopment of the site for commercial-led, mixed-use development does not raise any issue in regard to strategic policy considerations. Further information should be provided from the applicant in relation to the affordable workspace offer
- Affordable housing – The affordable housing offer meets Policy H5 and should be appropriately secured.
- Urban design and heritage – existing building is unattractive and poor quality. The development must demonstrate acceptable impacts in relation to the tall building proposed. The development would result in varying degrees of less than substantial harm to heritage assets and a total loss of significance of non-designated heritage assets 16a, 16b and 18 West Central Street from the demolition of these. GLA officers consider that the proposal would result in varying degrees of less than substantial harm to the significance of the heritage assets within the surrounding vicinity of the subject site. A further reduction of the height and massing of the tower could reduce heritage harm. Harm to heritage assets would be contrary to London Plan Policy HC1(C), however the NPPF heritage balance would also be triggered, and in accordance with the NPPF this harm would need to be able to be weighed against the public benefits of the proposal.
- Comments in relation to site optimisation, residential quality, inclusive design, children’s play space should also be addressed.
- Compliance with fire safety should be secured by condition.
- Transport – An Active Travel Zone assessment should identify necessary improvements within the vicinity. The new pedestrian route should always be publicly accessible and secured appropriately. Comments in relation to cycle parking and docking spaces, disabled parking, deliveries and servicing and construction logistics should be addressed with relevant items secured.
- Transition to a zero-carbon economy and sustainable infrastructure – satisfied with energy, PVs and potential future connection to a site-wide heat network should be secured via condition. Comments still to be provided on circular economy. The applicant should provide further response for GLA officers to reach conclusion on whether an appropriately thorough exploration of alternatives to demolition has been carried out.
- A condition should be secured requiring the applicant to submit a post-construction report.

- Environmental issues - Concerns around air quality considerations. The urban greening factor and biodiversity net gain should be secured.
- Condition should be attached regarding circular economy.
- The inclusion of fixed closed windows for the residential units (including affordable units) is a concern.
- *Officer's response: See Land use, Tenure and unit size mix of the proposed housing, Heritage – the balance of harm to heritage assets and public benefits is covered in the Conclusion, Urban design, Fire safety, Sustainable design and construction, conditions are attached on energy, sustainability, circular economy which ensure that the proposals address GLA concerns. A condition is attached on digital connectivity. Regarding fixed shut windows – see Air quality – these are only where air quality does not comply – on first floor properties on New Oxford Street and High Holborn.*

### 4.3 Historic England – Objection

#### Summary

- Would cause harm to a large number of designated heritage assets - multiple measures of harm that would range from the low through the middle part of the scale of less than substantial harm.
- The considerably enlarged tall building would exacerbate the existing visual discordance and contrast of scale with the historic townscape to the north.
- The proposed tower would be glimpsed in some more distant views, including from around the River Thames; however its marginal visual impact in any such views and on associated heritage assets would be negligible.

#### Selkirk House and Vine Lane

- The proposed tower would have a particularly harmful impact in views from certain important places in the Bloomsbury Conservation Area that offer some of the finest experiences of the area's special character. Views south from the portico and steps of the British Museum are closed by the rich facades around Great Russell Street, and the proposed tall building would rise conspicuously above their historic roofscape, visually competing with the delicate silhouette of a late Victorian mansion block and visually dominating the lower and more formal mid-Victorian stucco blocks laid out by Pennethorne. In the view from the Grade-I listed Bedford Square, the strong horizontal roofline of the Grade-II listed late Georgian buildings of Bloomsbury Street, just south of London's best preserved Georgian Square, would be interrupted by the vertical form of the proposed tall building. These listed Georgian and Victorian Bloomsbury terraces derive significance from their orderly planning and the collective architectural effect of their elegant, regular elevations, and would be harmed by the incongruous intrusion of a larger tower in their settings.
- The conservation area would also be harmed by this effect of the tower and by its considerable height and bulk in various views around the central part of New Oxford Street itself and streets off it, where the planned character and traditional style, grain and scale of the 19<sup>th</sup> Century development and its key buildings currently prevail. The buildings of the West Central Street block within the development site particularly contribute to significance in many of these views, and the settings of those which are listed buildings would

correspondingly be harmed by the discordant and imposing effect of the proposed tower in their near backdrop.

- The impact of the proposed tower on the conservation area would, in the NPPF's terms, reach the middle of the range of less than substantial harm, with harm of a slightly lower order to the affected listed buildings within it.
- The public realm improvements, including the new route, would benefit the area.

#### WCS block

- The proposals would sustain or enhance the significance of the listed buildings and the urban block to the conservation area

#### 10-12 Museum Street & 35-37 New Oxford Street

- The interiors of No. 10 would be retained and restored as a single dwelling, with particular attention to the historic details and finishes that unusually survive there. Nos. 11 and 12 would be reordered internally to provide flats.
- The proposals would bring the footprint of modern development hard up to the backs of the listed terrace, Nos. 10-12 Museum Street, up to raised podium level. While little of the fabric and only some of the plan in these rear areas is historic, the proposals would remove the remaining integrity of the full plots and legibility of the historic footprints within the block, causing a degree of harm.
- The internal repair of No. 10 would be of some heritage benefit, but other works would harm the terrace. At the rear of No. 10, the 19<sup>th</sup> Century closet wing (later laterally extended) would be demolished, in order to permit direct access to the podium level and garden within the depth of the block via a flight of stairs opening straight off the street. The loss of this original or early part of the No. 10 - the only surviving closet wing among the three houses - would cause some harm to its significance as a substantially intact 19<sup>th</sup> Century house.
- While few or no historic internal finishes appears to survive in Nos. 11 and 12, the historic plan form of the latter does, in the main, despite the structural alteration and internal and lateral opening-up that has taken place. Its staircase has its historic form and location, if not all its fabric. The arrangement of No. 12, being set over the old carriage arch and with the trace of its historic plot to the rear legible in plan, has some particular interest as part of the stub terrace. The loss of its stair and the remaining vertical integrity as a building would harm the terrace's significance, largely erasing any sense of the survival of its historic interior plan and arrangement.
- Taking into account the proposed works of reinstatement and restoration as well as the important erosions of significance, the proposals would result in less than substantial harm at the low end of the scale to the listed 10-12 Museum Street.
- The proposals at nos 35 and 37 look unlikely to cause harm and may help to recover some significance through character and layout

#### 16a, 16b and 18 West Central Street

- Their demolition would harm the conservation area through loss of their contribution to character and appearance. It would also damage the integrity of 19<sup>th</sup> Century urban block (otherwise only slightly interrupted by the 1920s facades of 39-41 New Oxford Street) to the detriment of the conservation



area and in both these ways demolition would harmfully deplete the significant settings of the block's listed buildings - most considerably 10-12 Museum Street and 43-45 New Oxford Street, which adjoin the ancillary buildings. As a non-designated heritage asset, the buildings would suffer total loss of significance.

- The height and bulk of the proposed replacement block would add to the harm principally caused by the demolition of the existing 16a-18 West Central Street. It would be most conspicuous around the junction of Coptic Street with New Oxford Street and, on the threshold of the conservation area, in a small range of views from Museum Street. In both areas it would form the backdrop to listed buildings in the block, where it would cause harm chiefly by introducing a sense of incoherence with and within the characterful urban block and their immediate historic settings. Though contextual aspects of the proposed façade design provide some degree of mitigation, the replacement building would be conspicuous as a large, modern insertion into the smaller-scale historic block.
- Taken together, the proposed works to the West Central Street block would cause mid-level less than substantial harm to the conservation area and to the listed buildings within the block through the impact on their settings.

*Officer's response: See analysis of significance assets in the Heritage section and an assessment of the level of harm. The impact on all designated and non-designated heritage assets is considered in this section.*

#### 4.4 The Georgian Group – Objection

- The height and scale of the proposed development would cause significant harm to the significance of several individual heritage assets and the wider Bloomsbury Conservation Area, Bedford Square, Montague Place, Bloomsbury Square, the British Museum, St George's Church, 10-12 Museum Street.
- The demolition of a section of the 19<sup>th</sup> Century block and erection of a six-storey building would firstly harm the setting of no.10-12 Museum Street due to the overbearing scale of the proposal. Whilst there would be harm to the character and appearance of the conservation area due to the inappropriate height in relation to neighbouring properties which at present form a coherent block.
- The internal works to Nos.11 & 12 Museum Street are inappropriate and would harm the significance of this set of heritage assets by eroding the historic plan form and legibility of the historic circulation route.
- The individual buildings mentioned above are all located within the Bloomsbury Conservation Area and contribute to its overall significance. The proposed 19-storey building would be visible from numerous important points and specific sub areas within the conservation area. Expanding on the heritage assets mentioned above, the tower would be visible from Lincoln Inns Fields, Bloomsbury Square Gardens, St George's Church, and several viewpoints within the street patterns surrounding the British Museum. More specifically, sub areas 3,5,6,7 and 8 would all be impacted.
- Harm at middle to higher end of the less than substantial spectrum.

*Officer's response: As above, see analysis of significance assets in the Heritage section and an assessment of the level of harm. The impact on all designated and non-designated heritage assets is considered in this section.*

#### **4.5 The Victorian Society – Objection**

- Proposed tower is far too tall, existing building already too tall.
- Harm to setting of Bloomsbury Conservation Area and nearby listed buildings.
- Environmental impact of demolishing Selkirk House and constructing a new, larger building, advocate a retrofitting approach that would retain the existing structure.
- The alterations to 11 and 12 Museum Street would harm significance by the erosion of the historic plan form and legibility of the buildings.
- The demolition of other buildings on West Central Street and their replacement with a 5-storey new building would harm the significance of the Conservation Area by the loss of buildings that are positive contributors and contribute to the historic legibility of the urban block.
- Scale of proposed buildings on new Vine Lane too big.

*Officer's response: As above, see analysis of significance assets in the Heritage section and an assessment of the level of harm. The impact on all designated and non-designated heritage assets is considered in this section.*

#### **4.6 Save Britain's Heritage – Objection**

- The proposals would carry a substantially harmful and disproportionate carbon cost. The applicant has demonstrably failed to explore alternatives to demolition in a meaningful way or demonstrate that a refurbishment would not be deliverable or viable.
- Objection to demolition of Stables block and impact on conservation area.
- Proposed tower too tall.
- Extreme contrast between height of tower and lower buildings.
- Harm to Bloomsbury Conservation Area
- Harm to nearby listed buildings and non-designated heritage assets.

*Officer's response: As above, see analysis of significance assets in the Heritage section and an assessment of the level of harm. The impact on all designated and non-designated heritage assets is considered in this section. Also Sustainability.*

#### **4.7 Transport for London**

- New north-south pedestrian route (Vine Lane) is strongly supported given the increase in pedestrian trips and the anticipated future increase in vehicle movement on the parallel section Museum Street due to planned highway changes. Clarification is required on the status of the route, which should be publicly accessible at all times of day in perpetuity and secured as such.
- Legible London signage should be installed to direct trips via this route and to avoid the junction of Museum Street and New Oxford Street.

- With regards the vehicle lift, a booking system should be implemented through the delivery and service plan.
- An Active Travel Zone assessment should identify necessary improvements within the vicinity.
- Relocation of cycle docking station is acceptable in principle.
- The replacement of the 228 multi storey parking spaces with a car free scheme is welcomed in this CAZ location.
- Onsite disabled parking space would usually be required. The applicant advises that the nearest on street disabled parking space is within 65 metres; clarification is required as to the current usage and capacity of this and other nearby spaces.
- The overall quantum of long stay cycle parking (429 spaces) would meet the minimum standards of the London Plan, which is welcome. The provision would enable the provision of 56 spaces formed by Sheffield stand (inc. 20 larger spaces), 21 semi vertical stands, 23 folded bike lockers and 236 two-tiers racks. It is considered that larger space should be increased to 21 to meet the London Plan requirement of minimum 5%.
- 29 short stay cycle parking spaces are proposed, which is below the London Plan minimum standards set out in policy T5 (Cycling) of 65 spaces required for this proposal. These spaces are distributed on Museum Street (15 spaces), High Holborn (14 spaces). The applicant explains that the Council would like to maintain a maximum footway width for West Central Street and therefore short cycle spaces in this location would conflict with that objective. To offset that shortfall, a contribution to Camden Council is proposed that could be used to provide spaces in the local area.
- A CMP has been submitted. A full Construction Logistics Plan should be submitted in line with TfL guidance and secured by condition. A financial contribution towards Legible London would be secured via section 106.

*Officer's response: See Transport.*

- 4.8 **Thames Water** – No objection subject to conditions on piling and water capacity.
- 4.9 **London Underground** – No objection.
- 4.10 **Crossrail** – No comments
- 4.11 **Greater London Archaeological Advisory Service (GLAAS)** – No objection subject to condition on further archaeological investigation. .

#### **London Assembly Member for Barnet and Camden**

##### **4.12 Anne Clark AM (Labour) - Objection**

- New plans still do not at all fit in with the local surroundings and will alter the whole feeling of the area.
- The tower is still far too big and bulky, it will be over 20 metres higher than even the existing Travelodge hotel, which any new building should be the same height as.
- The tower will ruin views from Bedford Square, the British Museum and Drury Lane.

- Demolishing the old buildings within the conservation area are contrary to Camden Council's Conservation Policies, this application takes no account for the climate emergency statements from both the GLA and Camden Council. This proposal of demolishing a perfectly usable building is a high carbon strategy. Surely a low-carbon strategy of refurbishment is better. Pulling down and disposing of all the existing concrete and steel girders etc and bringing in new concrete, girders, and other such building materials is surely not the responsible approach.
- The developers plan to build 48 new homes, but in reality, are also demolishing 18 existing homes. I am not convinced the low number of “affordable” units for local people will be the case in reality.

*Officer's response: See Urban design, Heritage, Land use.*

## **Members**

### **4.13 Councillor Julian Fulbrook (Labour – Holborn and Covent Garden) - Objection**

- Excessive height of the building
- Initial fraud in terms of social housing on the site
- Concerns regarding internal daylight/sunlight of proposed flats
- Failure to meet even the basic GLA and Camden Housing Design standards

*Officer's response: See Urban design, Heritage, the applicant originally stated that the 11 flats in the tower were ancillary to the hotel – these are now assessed as existing residential, Quality of the proposed residential accommodation.*

## **Local groups and institutions**

### **4.14 Bloomsbury Conservation Area Advisory Committee (CAAC)**

- Application treats two different sites as one entity.
- Total disregard to the immediate context of the historic urban neighbourhood; Bloomsbury CA, and near to the conservation areas of Covent Garden and Soho, as well as the British Museum, St George's Church and Bedford Square, all listed Grade I,
- The proposals for the historic block bounded by New Oxford Street, Museum Street and West Central Street buildings are utterly insensitive to their historic setting, some of the buildings are recently listed.
- No justification for compounding the harm by permitting the construction of a tower that is even larger and bigger than its predecessor, nor for the intensification of development of the adjacent historic block.
- Museum Street area has a very distinctive grain and street pattern consisting of a tight grid of streets containing small, intimately-scaled blocks of development. The area was developed in the later 17<sup>th</sup> Century and retains its early street pattern.
- No justification for the demolition of Selkirk House at all, in view of the Secretary of State's recent judgment on the proposal for demolition and redevelopment of M&S in Oxford Street, should be a strong presumption in favour of repurposing and reusing buildings.

- The only unlisted part of the West Central block is listed as a positive contributor to the conservation area and is an integral part of the block. It is significant in its own right, and any demolition would be causing serious harm to the Conservation Area.

*Officer's response: See The Proposal, Heritage, Urban design, Sustainable design and construction.*

#### 4.15 **Save Museum Street**

An alternative scheme has been drawn up by Save Museum Street. However, this is not taken into consideration. This report deals only with the representations made in respect of the current planning and listed building applications.

Save Museum Street commissioned their own daylight/sunlight report and reports on the carbon case for retention and retrofit. The comments in these reports are included below.

##### Sustainability, environmental, climate emergency

- Flawed approach which appears to be designed to demonstrate that the desired approach of demolition is the only viable option.
- Ceiling heights are sufficient in the existing building if services are exposed.
- Improvements in operational emissions and energy use are not feasible.
- The comparison of refurbishment options is inadequate and flawed in its methodology.
- No objective low-carbon retrofit scheme has therefore been developed.

*Officer's response: See Sustainable design and construction, the methodology and conclusions of the submitted reports concerning demolition and retrofit have been independently assessed.*

##### Housing

- Loss of HMO accommodation and no replacement.
- Developers say scheme is not financially viable, but proposes a payment-in-lieu for housing.
- The developers have included the HMO accommodation as market housing in their calculations.
- The developers are offering a split of 57% social rented and 43% affordable intermediate – not policy compliant.
- Rent levels for the affordable intermediate housing would not be affordable.
- The new build housing within the New Oxford Street block fails to meet daylight and sunlight basic minimum standards, 82% and 86% of all habitable rooms within NOS block and Vine Lane block fail to meet the minimum BRE daylight standards and of these, half receive zero daylight penetration and of the 41 living rooms, 28 living rooms have no sunlight whatsoever.
- The new build housing within the NOS block fails to comply with the minimum privacy standards, overlooking standards, private outdoor space, or communal amenity space.
- A very high proportion of the new housing has no dual aspect.

- Private open space that is being provided is terrible quality with absolutely minimal daylight penetration and absolutely no possibility of any sunshine.
- The developers claim that the access deck within the NOS block will double up as an amenity space for the dwellings, though only 4 dwellings of the 21 have direct access to the first-floor deck.
- Amenity impact on existing residential accommodation on Museum Street and New Oxford Street.

*Officer's response: See Tenure and unit size mix, the HMO was not formally approved as such or registered as an HMO – see Land use, Quality of the proposed residential accommodation.*

### **Townscape and visual impact**

- Proposed tower will be much wider and therefore far more visible, bulky 41m long east and west elevations will present a slab-like appearance to both close and distant views.
- The 75-metre-high office tower 'slams' into the sensitive Bloomsbury townscape with no 'zone of mitigation' and with no regard for its proximity to listed buildings and conservation areas.
- Ignores wider architectural, townscape and heritage constraints, impact on local townscape.
- The DRP was unconvinced in November 2019 – concerns raised about height and bulk.
- Question reliability of townscape modelling.
- Impact on Bedford Square, Selkirk House already detracts from the setting.

### **Heritage impact – SMS commissioned their own Heritage Statement**

- Submitted information ignores some requested views; British Museum, St George's Church, does not consider views from Primrose Hill, Blackfriars Bridge, Albert Embankment.
- Scant consideration to encroachment onto the protected silhouette of the Palace of Westminster, ignores viewpoints from within Westminster.
- Sceptical of some viewpoints – appear 'curated', British Museum portico, Drury Lane.
- Only one view to assess the impact from Bloomsbury Square and no views from within Russell Square or Lincoln's Inn Fields.
- No views from gardens on roof of Post Building.
- No consideration has been given to how intrusive the proposed tower will be as it looms above the umbrella shop and its neighbours.
- The application site includes two very different sites – one with many listed buildings – and should not be considered as one site.
- Impact on 43-45 New Oxford Street, 16 West Central Street, Bloomsbury Central Baptist Church, 233 Shaftesbury Avenue adjacent, 83 Endell Street, Shaftesbury Theatre, Centre Point, Holborn Town Hall and Library.
- Tower will set a precedent, encourages a cluster of tall buildings in Bloomsbury.
- Overdevelopment.

*Officer's response: See Heritage and The Proposals. Numerous additional views were agreed with Save Museum Street, the view from the roof garden*

*of the Post Building is not a material consideration, see section on Design Review Panel in Urban Design section.*

### **Design quality**

- Excessive height and bulk.
- Contrast with existing buildings, the facades of the new building are regular and bland in contrast to the rich variety of the buildings of Charles Doll.
- Stepped design lacks architectural simplicity.
- Proposed aluminium cladding on a much higher and wider tower will create a distracting, shiny surface.
- Vine Lane is shown flooded with sunlight, will be dark and potentially dangerous, not logical corridor, no public benefit.

*Officer's response: See Urban design, Quality of the proposed residential accommodation.*

### **Community engagement**

- Local views have been ignored.
- Submitted Statement of Community Involvement is misleading.
- Lack of real community engagement, less than on other big schemes in Camden.
- Not a single community, political or local group that has come out to support this proposed development.
- A coalition of community members have come together to oppose this project,
- Issues with public display of model.
- Camden should have ensured the applicant undertook proper public consultation.

*Officer's response: the applicant was strongly encouraged to undertake their own consultation prior to submitting the application, and did so. The Council undertook its own public consultation on the applications. The model has been available to view close to the site.*

### **Daylight and sunlight – SMS commissioned their own Daylight/Sunlight Report**

- The development appears to provide a relatively low level of adherence to daylight and sunlight guidelines. It should be noted that there would be a number of rooms where none of the area would see the target lux and/or see no sunlight.
- In West Central Street, 56 out of 68 dwellings do not meet minimum recommended standards for acceptable levels of daylight and 17 out of 21 living rooms here fail to meet even minimum levels of sunlight, with 9 of these achieving zero hours of sunlight on 21st March as recommended.
- In Vine Lane 36 out of 41 habitable rooms do not meet the minimum BRE recommended standards and 18 of these “severely underperform”. For acceptable levels of sunlight, only 3 out of 19 living rooms here comply with minimum standards and 63% of rooms receive no sunlight at all.
- In High Holborn 9 out of the 13 habitable rooms do not meet BRE minimum standards and 2 are described as “severely underperforming”.

- Unacceptable degree of overshadowing to existing and proposed accommodation
- Overshadowing of adjacent streets by this huge office tower.
- Light spill from office windows.
- Glare from the red warning beacons required for aircraft safety
- Museum Street, West Central Street and Vine lane will be shaded canyons.

*Officer's response: See Quality of the proposed residential accommodation, Amenity of neighbouring properties.*

### **Open space and public realm**

- Lack of public open space and play space, could be provided at roof level.
- Access deck and courtyard will be overshadowed most of the year, access deck will have air intake and extract ducts.
- New cut through is not necessary and not popular locally, no historical precedent for the cut-through, is an artificial construct, will be overshadowed and overwhelmed by the tower, poor microclimate, does not improve movement.
- Loss of ten trees including mature trees.
- 85% of the Museum Street frontage between West Central Street and High Holborn will be given over to private entrance lobbies to the office blocks, dead frontage.
- Public realm on Museum Street has been reduced, public realm will be much darker and windier.
- Inadequate private open space for the residential accommodation and poor light levels to proposed flats.

*Officer's response: Nature conservation, landscape and biodiversity, Urban design.*

### **Basement impact**

- Risks posed to underground transport and servicing infrastructure from piling.
- Impact on Grape Street properties.
- Campbell Reith also confirmed that further investigation, modelling and assessment was recommended by the BIA; that it had not been completed; and should be carried out.

*Officer's response: See Basement impact*

### **Transport, access and servicing**

- Servicing trips have been underestimated, time taken for vehicle lift not included In assessments, what is fall back solution if the lift breaks, impact from servicing, scheme is an ideal opportunity to provide a micro-distribution facility for the West End, should be a maximum servicing daily limit, insufficient capacity In the loading bays.
- Putting refuse bags on the street for collection Is not appropriate for a new development.

*Officer's response: See Transport*



### **Construction**

- Failure to repurpose the existing Selkirk House structure in preference to demolition and new construction.
- Failure to follow a meaningful low carbon strategy.
- Excessive length of the construction period of up to 5 or 6 years.
- High levels of noise generated during construction and by the proposed buildings in use.
- Unmitigated addition to the already unsafe pollution levels.
- Disruption to the quality of life of local residents and businesses.
- Full extent of basement Impact has not been fully covered.

*Officer's response: See Transport.*

### **Hotel use**

- Hotel use on this site is appropriate.
- Incorrect that hotels are no longer in demand.
- False argument put forward that the hotel is empty - It is only empty because of developer's actions, dereliction being used as an argument.
- Little economic benefit to the area.

*Officer's response: See Land use.*

### **Phasing and Other**

- Time allowed for demolition and construction is overly optimistic (1-1.5 years for demolition, 6 years for overall demolition and construction)
- Developers will build offices before providing affordable housing, risk of affordable housing not coming forward.
- The current proposals have an inbuilt poor revenue flow from the development as any possibility of any rental income is delayed until the tower block is constructed.
- Developer's financial arrangements are offshore and hidden.
- Health impacts.
- Noise, dust and vibration from demolition

*Officer's response: See Transport, a Section 106 obligation would ensure that the offices could not come forward without the housing.*

#### **4.16 Bloomsbury Residents Action Group - Objection**

- New tower is 50% higher than the existing.
- Impact on numerous iconic historic & Listed buildings (St George's, The British Museum, Bedford Square, etc).
- Demolition would create congestion pollution and chaos.
- Public benefit is feeble; 20 + extra flats.
- Offices not needed.
- The new application is not subject to a new public consultation even though very similar to previous application.

*Officer's response: See Urban Design, Heritage, Transport, Conclusion, Land use, the current application was consulted on as per standard practice.*

#### 4.17 Soho Society - Objection

- Impact on climate change from demolition and release of carbon dioxide, retrofitting has not been considered.
- Townscape and heritage impacts – including on Soho Conservation Area.
- Overshadowing of buildings.
- Question viability of the scheme.

*Officer's response: See Sustainable design and construction, Heritage, Amenity of neighbouring properties. Officers do not consider there would be any harm to the Soho Conservation Area, given its distance from the site.*

#### 4.18 Covent Garden Community Association - Objection

- Wholly unsuitable for the site and its context.
- Main tower is too tall and bulky – at 75 metres it would be 65% the height of Centrepoint and 40% higher than Selkirk House is currently which is already too tall.
- Impact on Seven Dials and Georgian Bloomsbury.
- Destruction of historic buildings.
- New infill building on West Central Street block is out of scale and unsympathetic.
- Inadequate housing, any new housing should definitely come forward as affordable housing.
- Lack of public and recreational space, damage to neighbouring open space, nowhere for families to play or inter-generational inter-action.
- Overshadowing of public garden on roof of Post Building.
- No improvement to safety and security, proposed alley will make matters worse.
- Building should be refurbished instead of demolished.
- Impact on amenity during demolition, excavation and build phases.
- Concerns that proposed servicing is insufficient.
- Precedent.

*Officer's response: See Urban Design, Conservation, Land use, Nature Conservation, Trees and Biodiversity, Amenity of neighbouring properties.*

#### 4.19 Covent Garden Area Trust - Objection

- The height, scale and bulk of the proposed building are all vastly over-proportioned for this site. It would dwarf surrounding buildings and dominate many important views in the wider area.
- Due to its inappropriate height, scale and design, the proposed building would detract from the setting of numerous Grade I, II and II\* listed buildings, including St George's Church, the British Museum, Bedford Square, and the newly-listed buildings directly adjacent to the site. This would adversely impact upon many of these buildings' special interests, through an erosion of their setting.
- Impact on Bloomsbury Conservation Area.
- The proposed building would adversely impact the character and appearance of the Covent Garden, Bloomsbury and Soho Conservation Areas due to its oversized scale, visual dominance and unsympathetic design.
- Demolition of the existing building, - should be retained and retrofitted
- Precedent of tall buildings.

*Officer's response: See Urban design, Heritage.*

#### 4.20 South Bloomsbury TRA – Objection

- Harm to Bloomsbury Conservation Area.
- Tower is too tall.
- Alterations to listed buildings in West Central Street will be harmful.
- Carbon emissions.
- Loss of amenity, loss of light.
- Socially rented flats within WCS block will not have natural light, poor light for proposed housing.
- Noise and pollution.
- Questionable business premise of application.
- Only a disappointingly small increase of genuinely affordable housing is being offered with regard to social housing (11 flats).
- New pedestrian cut-through from West Central Street to High Holborn will merely create an unpleasant, overshadowed, narrow path that will contribute little benefit as it does not link up with anything in particular, not even to road crossings and will likely attract anti-social activities such as drug-dealing.
- Other uses would be preferable such as for drama, music, dance rehearsals and other artistic, educational and film industry.
- Conservation officers are yielding to pressure.

*Officer's response: See Heritage, Urban design, Sustainable design and construction, Amenity of neighbouring properties, Quality of proposed residential accommodation, Nature conservation, trees and biodiversity.*

#### 4.21 Seven Dials Trust – Objection

- Impact on Conservation Areas of Covent Garden, Bloomsbury and Soho.
- Demolition is contrary to the climate change policies of the UK, the Greater London Authority and Camden, all of which advocate retaining existing buildings and retrofitting them to bring them up to modern standards

*Officer's response: See Heritage, Sustainable design and construction.*

#### 4.22 Dudley Court Residents and Tenants Association – Objection

- The proposed building is too tall and bulky.
- The proposed building will adversely affect the surrounding area.
- The proposed building will adversely affect the nearby and surrounding Conservation Area.
- It will mean the demolition of the existing Selkirk House, which is a perfectly serviceable building, although we consider the building still to be too high for the surrounding area.
- The demolition will be contrary to Climate Change regulations and updating of existing buildings to comply with the regulations.
- The proposed building if allowed sets a precedent for further tall buildings in the immediate area.
- There is too little housing being provided, especially social housing.

*Officer's response: See Urban design, Amenity of neighbouring properties, Heritage, Sustainable design and construction, Land use.*

#### 4.23 Camden Cycling Campaign – Concerns

- Although the documents are comprehensive they do not make it clear exactly how construction vehicles will get to and from the site from the TLRN. Some of the figures are quite general. More details of arrangements and routes are needed.

*Officer's response: See Sustainable design and construction,*

#### 4.24 Climate Emergency Camden

- Welcomes that Camden is using qualified external consultants to advise planning officers about the carbon impact of new development
- The use of the building for residential has not been shown to be unfeasible, should be properly considered for residential use, the Borough's need is for more residential not more commercial space, building should be properly considered for residential use
- Application should be refused given arising demolition waste, new construction materials needed and upfront embodied carbon
- Requirement for demolition is not proven and is not justified.
- Impact from demolition, new construction materials, embodied carbon
- If recommending approval, planning officers must explain in specific terms to the planning committee on what basis they have made this value judgement.

*Officer's response: See Sustainable design and construction,*

#### 4.25 London School of Economics (LSE) – Objection

- Proposed height.
- Heritage harm, harm to Bloomsbury Conservation Area, harm to Somerset House – protruding above the roofline.
- Impact on students at halls of residence at 178 High Holborn; the Analysis identifies that only 20% of rooms within the LSE High Holborn would pass the BRE Guidelines for Vertical Sky Component with 13 windows experiencing changes in excess of 40%. The only justification given by GIA for these significant reductions in VSC is that “the Site has been designated for development and growth and this element of the Site has been allocated for redevelopment, lower daylight values to this property are expected should any meaningful massing be achieved on the Site.” A further 5 bedrooms experience a reduction in No Sky Line in excess of 40%, which is justified by GIA on the basis of the transient nature of student residences. Impact on wellbeing of students.
- Inappropriate servicing and delivering arrangements, safety of students.
- Noise.
- Loss of trees.
- Air quality.

*Officer's response: See Urban design, Heritage, Amenity of neighbouring properties, Transport, Nature conservation, trees and biodiversity, Air quality.*

#### 4.26 Central District Alliance (business group) – Support

- Existing site does not support economic activity.

- High quality new workspace that is estimated to directly support over 1,700 jobs in the area and deliver nearly £15m per year in Business Rates and Council Tax.
- Highly accessible area.
- Removal of multi-storey car park and provision of a car-free development.
- Provision of housing, including affordable housing.
- Public realm improvements, opening Vine Lane will discourage anti-social behaviour and promote safety.
- The updated proposals retain and repair the listed buildings that form part of the West Central Street block at 10-12 Museum Street and 35-37 New Oxford Street.

### **Adjoining occupiers**

4.27 Nine site notices were displayed around the site from the 30<sup>th</sup> June, expiring on the 3<sup>rd</sup> July 2023 and on the 19<sup>th</sup> July, expiring on the 12<sup>th</sup> August 2023. A press advert was placed on the 29<sup>th</sup> June 2023 in the Camden New Journal.

### **Representations summary**

4.28 It should be noted that 330 objections were received against the previous application (2021/2954/P). The only significant changes between this application and the current application are the removal of the roof extensions on the recently-listed buildings on the West Central Street block and the removal of one storey on a new building proposed in this block. The objections received to this application are similar in terms of content and issues raised to the objections received on this application which are summarised below.

4.29 **221** letters of objection were received from local residents raising the following issues:

#### **Heritage and Conservation**

- All of the existing buildings which contribute to the character and appearance of the conservation area should be retained.
- Harm to heritage assets, harm to Bloomsbury Conservation Area, harm to Covent Garden Conservation Area, harm to Soho Conservation Area, harm to Seven Dials Conservation Area, harm to St George's Bloomsbury, harm to British Museum, harm to Bedford Square, impact on Central London not outweighed by public benefits, St George's Church not properly considered.
- Loss of 19<sup>th</sup> century stables building, loss of historic buildings on the site.
- Impact on streetscape and views.
- Precedent for tall buildings in the area.
- Despite the fact that some of the sites contain listed properties - no attempt has been made to propose a unified whole with the new elements harmonising with the renovated buildings.
- The properties in the West Central Street block only need refurbishment because they have been neglected.

*Officer's response: See Heritage.*

#### **Design**

- The existing building is already too tall and should not have been approved, the height of building is enormous for the locality, grossly disproportionate, the building is too bulky compared to the original design, will be 20m higher than the existing building, no building should exceed the height of Centre Point.
- A dangerous precedent will be set if this is granted.
- Centre Point and Central St Giles have much more generous open space
- The southerly Vine Lane block seems to have been conceived without taking any account of the scale and height of the heritage buildings in Grape Street.
- The High Holborn Building will be higher than the Cuban Embassy, impact on the Cuban Embassy.
- The eastern end of the proposed Vine Lane building has an absurd angular tower which would dominate the High Holborn facade.
- Impact on skyline.

*Officer's response: See Urban design, the height of the High Holborn building responds to the Cuban Embassy, the tower building would be 63% the height of Centre Point .*

### **Amenity**

- Loss of daylight to neighbouring flats, including those circled in red which are the only living room/kitchen windows in properties and the windows circled in blue are the only windows serving bedrooms.
- Overshadowing.
- Flats on West Central Street; In relation to Flat 5 on the third floor, the daylight/sunlight report states they have given no weight to the impact to these windows, given the property offers short term lets, "moderate to major adverse", impact on flat 3, the argument of the projecting wing lacks substantiated evidence.
- Rights of light.
- Loss of privacy of neighbours, Queen Alexandra Mansions, West Central Street, Grape Street.
- Loss of light to Tavistock Chambers, Grape Street, West Central Street, Travelodge on Drury Lane.
- Overshadowing.
- Loss of view.
- Light pollution.
- The terraces proposed may need to be re-thought in the light of the recent Tate Modern case.
- Concerns about substation close to residential properties.
- Noise and vibration from building works.
- Asbestos not mentioned in application documents, asbestos risks.
- Impact on health and welfare of residents.

*Officer's response: See Amenity of neighbouring properties, Transport, asbestos risks would be dealt with during the construction phase.*

### **Land use**

- Area does not need intensification.

- The affordable housing needs strict binding legal covenants because they're never truly made available to residents on low incomes, affordable housing is not affordable.
- Insufficient housing proposed, insufficient affordable housing.
- Proposals will not benefit community.
- The need for housing outstrips the need office space hugely with 7000 people on Camden's waiting list for housing and 31,000,000sqft of empty office space in London, too little housing, insufficient affordable housing, insufficient social rented affordable housing, offices not needed – especially after the pandemic, offices not needed, declining office market.
- Proposed housing is of poor quality, poor levels of light.
- No need for 'run-of-the-mill commercial outfits'.
- The tower will make local businesses fail.
- Impact on tourism.
- Impact on local businesses.
- Could be a community space or a park.
- Such development should go to outer parts of London or other main cities.

*Officer's response: See Principle of development, Land use, the affordable housing would be secured by Section 106, Conclusion, Quality of proposed residential accommodation, the scheme would result in environmental benefits and so would be unlikely to affect tourism.*

### **Public realm, biodiversity and trees**

- The public realm area also includes a gate to restrict public access, making it worthless.
- Does not comply with Camden's open space policies.
- More planting required to mitigate urban heat island.
- Loss of trees, existing trees should be accommodated.
- Birds will be discouraged from the area.
- Impact on tranquillity of Princes Circus.
- Cannot say that the development will improve safety and reduce antisocial behaviour.

*Officer's response: See Nature conservation, trees and biodiversity, Safety and security.*

### **Microclimate**

- A building of this height will create downdraft and wind blast just as Centre Point does.

*Officer's response: See Microclimate.*

### **Transport**

- Access to Grape Street would be severely limited.
- West Central Street will be obstructed during construction.
- The TA and DSP (produced by Arup) cannot feasibly be implemented.
- The TA is based on the original scheme (2021) and not on a revised one produced in 2022. The original scheme assumed the Class E commercial units would be 50% retail and 50% F&B. The 2022 scheme assumed all F&B as a worst case scenario.

This scheme goes back to 50/50 despite the fact that retail is being converted to F&B all over the area.

- Without any information on the cycle time of the vehicle and service lifts it is not possible to determine if the capacity is sufficient – our view is that there is a need for 4 bays and 2 vehicle lifts.
- Some deliveries will be made from a kerbside loading bay within the Princes Circus scheme, but this bay needs to be shared with all the commercial businesses in Princes Circus,
- The DSP describes a bay on Museum Street as a loading bay, but it is in fact a pull in bay (controlled with a Double Yellow line) which is often used by vehicles for the Post Building. It cannot be assumed to be available.
- The TA assumes that there will be NO visitors arriving by taxi/PHV at the office building, which has a normal occupancy of 1,600. This seems completely unrealistic.
- Timetable of demolition, construction and road closures is opaque.
- Insufficient detail for DMP and CMP.
- Loss of multi-storey car park, this is a valuable community facility, especially as number of on-street car parking spaces continues to decline, increase in electric vehicles reduces the environmental arguments to get rid of car parking, absurd to increase floorspace on site but reduce parking.

*Officer's response: See Transport, Land use.*

### **Basement and piling**

- The Basement Impact and Structural Impact Assessment fails to provide sufficient detail as to how this technically extremely difficult and delicate operation would be carried out.
- Piling should be independently reviewed.

*Officer's response: See Basement impact*

### **Sustainability**

- The demolition is unjustified due to embodied carbon, it should be retained and retrofitted, there are viable alternatives to demolition, The M&S Oxford Street decision should be taken into account, redevelopment unnecessary, building is structurally sound.
- The application should be assessed using current target and methodologies for assessing carbon emissions and embodied carbon cost should be considered and reported on.
- Contribution to climate change, Camden has declared a Climate Emergency.
- The Non Domestic New Build falls considerably short of 35% CO2 reduction at only 22%. This is the difference of almost 10 tonnes of CO2 per year more. The guidance does not apply to refurbishments; such that they should therefore not count in the calculation.
- Building could be refurbished as a hotel.

*Officer's response: See Sustainable design and construction, Land use.*

### **Vine Lane**

- No need or desire for Vine Lane.
- Concerns and ambiguity over whether Vine Lane will be gated.



- Will be dark and prone to crime and drug abuse.
- As draft Holborn vision has been paused, proposals for this lane pre-empt the Holborn Vision, a formal consultation and risk assessment on the topic.
- Who would manage the lane, would it be gated, would there be security.

*Officer's response: See Nature conservation, trees and biodiversity , Safety and security, Vine Lane would not be gated to begin with but could be later on if issues arise – the situation would be monitored.*

### **Viability**

- The viability reports state that the scheme is not viable. It would be a huge risk for the Council to approve the applications in their present form, risk to housing delivery.

*Officer's response: See Viability. .*

### **Consultation and Process**

- Applications are premature.
- Insufficient public consultation by applicant.
- Misleading description.
- Few CGI's for the West Central Street block.
- Only minor changes since previous application.
- Confusing consultation expiry dates – different between planning application and listed building consent application.
- Model was removed.
- Application was validated without including the latest environment or energy reports.
- Separate plots within the site deserve their own individual attention, should not be a composite application combining the two distinct urban blocks.
- Inadequacy of materials presented.
- Applicant has failed to consider sensible, sustainable, more economic and deliverable alternatives.
- Failure to adhere to draft Site Allocations Plan.
- Different planning officers should determine the application from those involved in the pre-application process, or different officers should supervise the process, objectivity of planning officers, proposals would accrue economic benefit to the Council through CIL and business rates.
- Insufficient time to read through all submission documents.
- Applicant did not make hard copies of their application documents.
- Council has also been disappointing in failing to respond to questions.

*Officer's response: the processing of this application has followed standard procedure at pre-application, validation and consultation stages, the model has been available for view for a substantial period, officers have responded to questions when these have been raised.*

### **Others**

- No local support.
- Loss of value to neighbouring properties.

- LabTech are not a suitable freeholder, poor management of a building owned by LabTech.
- Health Impact Assessment is worthless – this document states that Selkirk House has already been demolished.

23 letters of Support were received raising the following points:

- Will significantly improve area, area has been in decline, will revitalise area.
- Derelict building is ugly, has been empty for years.
- Car park is unsustainable and not required in modern Central London.
- Magnet for anti-social behaviour, proposals will reduce anti-social behaviour.
- Public realm improvements, planting, welcome new pedestrian route.
- New office and residential development would enhance the aesthetic and community value of the area.
- New restaurants and cafes welcomed.
- Bringing new companies, workers and residents to Museum Street would provide a much-needed economic uplift for surrounding businesses – more customers and foot traffic.
- Construction and permanent jobs created will also aid employment locally.
- Increased business rates and council tax revenue generated by the project will help fund essential council services at a time when budgets are stretched thin, business rates will allow Council to spend more on local services and infrastructure.
- Additional income for the council could also help tackle pressing issues like affordable housing and homelessness.
- Provision of housing and affordable housing.
- Proposals will tie in to improvements at Prince's Circus.
- The architectural approach to both the retained buildings and new ones proposed for the West Central Street Block is sensitive and will make a positive contribution to the area.
- Sensitive restoration of the listed buildings in the West Central Street/ New Oxford Street block, enabling their sustainable reuse as new homes.

## **5 POLICIES & GUIDANCE**

### **5.1 National Planning Policy Framework 2023**

### **5.2 NPPG**

### **5.3 The London Plan 2021**

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience
- SD1 Opportunity Areas
- SD4 The Central Activities Zone
- SD5 Offices, other strategic functions and residential development in the CAZ
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- D9 Tall buildings
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D14 Noise
- H1 Increasing housing supply
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H8 Loss of existing housing and estate redevelopment
- H9 Ensuring the best use of stock
- H10 Housing size mix
- S4 Play and informal recreation
- E1 offices
- E2 Providing suitable business space
- E3 Affordable workspace
- E9 retail, market and hot food takeways
- E10 Visitor infrastructure
- E11 Skills and opportunities for all
- HC1 Heritage conservation and growth
- HC2 World Heritage sites
- HC3 Strategic and local views
- HC4 London views management framework

- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodland
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI6 Digital connectivity infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI12 Flood risk management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- FF1 Delivery of the plan and planning obligations

#### **5.4 Mayor's Supplementary Planning Guidance**

#### **5.5 Camden Local Plan (2017)**

- G1 Delivery and location of growth
- H1 Maximising housing supply
- H2 Maximising the supply of housing from mixed use schemes
- H3 Protecting existing homes
- H4 Maximising the supply of affordable housing
- H6 Housing choice and mix
- H7 Large and small homes
- H10 Housing with shared facilities
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- E2 Employment premises and sites
- E3 Tourism
- A1 Managing the impact of development
- A2 Open space
- A3 Biodiversity
- A4 Noise and vibration
- A5 Basements
- D1 Design

- D2 Heritage
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding
- CC4 Air quality
- CC5 Waste
- TC1 Quantity and location of retail development
- TC2 Camden's centres and other shopping areas
- TC4 Town centre uses
- TC5 Small and independent shops
- T1 Prioritising walking, cycling and car-free development
- T2 Parking and car-free development
- T3 Transport infrastructure
- T4 Sustainable movement of goods and materials
- DM1 Delivery and monitoring

## 5.6 Supplementary Planning Policies

### Camden Planning Guidance

Access for all  
 Air quality  
 Amenity  
 Basements  
 Biodiversity  
 Design  
 Employment sites and business premises  
 Energy efficiency and adaptation  
 Housing  
 Planning for health and wellbeing  
 Public open space  
 Transport  
 Trees  
 Water and flooding

## 5.7 Draft Holborn Vision and Urban Strategy (2019)

## 5.8 Draft Site Allocations Plan (2020)

## 5.9 Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

## 5.10 Seven Dials Conservation Area Statement (1998)

## 5.11 National First Homes Policy (Written Ministerial Statement May 2021)

## 5.12 Camden Planning Statement on the Intermediate Housing Strategy and First Homes (March 2022)

## ASSESSMENT

The principal considerations material to the determination of this application are considered in the following sections of this report:

6	<b>Principle of redevelopment</b>
7	<b>Land use</b> <ul style="list-style-type: none"><li>- Introduction</li><li>- Loss of hotel</li><li>- Loss of car park</li><li>- Proposed office use (Class E(g))</li><li>- Principle of residential use and the mixed use policy</li><li>- Loss of HMO accommodation</li><li>- Other proposed Class E uses (retail E(a), food and drink (b), other appropriate services in a commercial, business or service locality (c))</li><li>- Conclusion</li></ul>
8	<b>Tenure and unit size mix of the proposed housing</b> <ul style="list-style-type: none"><li>- Policy review</li><li>- Proposals</li><li>- Affordable housing</li><li>- Viability</li><li>- First Homes</li><li>- Mix of unit sizes</li><li>- Conclusion</li></ul>
9	<b>Quality of proposed residential accommodation</b> <ul style="list-style-type: none"><li>- Policy review</li><li>- Daylight, sunlight and aspect</li><li>- Design and layout</li><li>- Accessible housing</li><li>- External amenity space</li><li>- Noise</li><li>- Conclusion</li></ul>
10	<b>Conservation and Heritage</b> <ul style="list-style-type: none"><li>- Policy review</li><li>- Historic development and surrounding townscape</li><li>- Summary of significance</li><li>- Summary</li><li>- Site and setting</li><li>- Proposal and assessment</li><li>- Internal alterations to listed buildings</li><li>- Conclusion – Impact on significance</li><li>- Archaeology</li></ul>
11	<b>Urban design</b> <ul style="list-style-type: none"><li>- Policy review</li><li>- Site appraisal and opportunity</li></ul>

	<ul style="list-style-type: none"> <li>- West Central Street block</li> <li>- Selkirk House</li> <li>- Assessment of proposals</li> <li>- Design response</li> <li>- Site layout and public realm</li> <li>- Ground floor, uses and access</li> <li>- Scale and massing</li> <li>- Architectural approach and materiality</li> <li>- Design Review Panel</li> <li>- Design monitoring</li> <li>- Conclusion</li> </ul>
12	<p><b>Nature conservation, landscape and biodiversity</b></p> <ul style="list-style-type: none"> <li>- Policy review</li> <li>- Introduction</li> <li>- Trees</li> <li>- Landscaping</li> <li>- Biodiversity</li> <li>- Conclusion</li> </ul>
13	<p><b>Amenity of neighbouring properties</b></p> <ul style="list-style-type: none"> <li>- Policy review</li> <li>- Introduction</li> <li>- Daylight, sunlight and aspect</li> <li>- Categorising impacts and alternative targets</li> <li>- Methodology</li> <li>- Assessment</li> <li>- Loss of privacy</li> <li>- Noise</li> <li>- Conclusion</li> </ul>
14	<b>Health impact</b>
15	<b>Basement impact</b>
16	<b>Air quality</b>
17	<b>Microclimate</b>
18	<p><b>Sustainable design and construction</b></p> <ul style="list-style-type: none"> <li>- Policy review</li> <li>- Introduction</li> <li>- The site and the proposal</li> <li>- Redevelopment strategy</li> <li>- Demolition of the existing buildings</li> <li>- Whole Life Carbon</li> <li>- Energy and carbon reductions</li> <li>- Energy and carbon summary</li> <li>- Total carbon reductions</li> <li>- Be lean stage</li> <li>- Be clean stage</li> </ul>

	<ul style="list-style-type: none"> <li>- Be green stage</li> <li>- Be seen stage</li> <li>- Climate change adaption and sustainable design</li> <li>- Sustainability</li> <li>- Conclusion</li> </ul>
19	<b>Flood risk and drainage</b>
20	<b>Fire safety</b>
21	<b>Transport</b> <ul style="list-style-type: none"> <li>- Policy review</li> <li>- Site location and access to public transport</li> <li>- Trip generation</li> <li>- Travel planning</li> <li>- Access and permeability</li> <li>- Cycle parking</li> <li>- Car parking and vehicle access</li> <li>- Construction management</li> <li>- Deliveries and servicing</li> <li>- Highway works</li> <li>- Pedestrian, Cycling and Environmental Improvements</li> <li>- Cycle hire improvements</li> <li>- Conclusion</li> </ul>
22	<b>Safety and security</b>
23	<b>Refuse and recycling</b>
24	<b>Planning obligations</b>
25	<b>Mayor of London's Crossrail CIL</b>
26	<b>Camden CIL</b>
27	<b>Conclusion – planning application</b>
28	<b>Conclusion – listed building consent</b>
29	<b>Recommendations</b>
30	<b>Legal comments</b>
31	<b>Conditions (planning)</b>
32	<b>Informatives</b>
33	<b>Conditions (listed building consent)</b>



## 6 PRINCIPLE OF REDEVELOPMENT

- 6.1 The site is near several rail and tube stations and well connected with bus routes.
- 6.2 London Plan policy D2 says density of development proposals should consider future planned levels of infrastructure, rather than existing levels, and be proportionate to the site's connectivity and accessibility in terms of transport, jobs, and services. London Plan policy D3 says higher density developments should generally be promoted in areas well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling and that development must make the best use of land.
- 6.3 The application site benefits from 'excellent' transport links, meaning that development here will have good access to public transport connections. In this respect it is expected that the site should deliver higher density development.
- 6.4 Paragraphs 119-120 of the NPPF (2023) which deal with 'making effective use of land' state that 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions' and that planning policies and decisions should 'encourage multiple benefits, including through mixed use schemes'.
- 6.5 Policy G1 of the Camden Local Plan (CLP) states that the Council will create the conditions for growth to deliver the homes, jobs, infrastructure, and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. The Tottenham Court Road area is identified as a Growth Area in Policy G1 of the CLP, where the most significant growth in the borough is expected to be delivered.
- 6.6 The Tottenham Court Road Growth Area includes parts of both Camden and Westminster and is centred around Tottenham Court Road station. The London Plan expects a minimum of 500 new homes and 5000 new jobs to be delivered in the growth area. Based on the identified opportunity sites in the Sites Allocations document, the Council expects around 60% of homes and more than half of the jobs to be provided in Camden's part of the growth area, with the rest being provided in Westminster. Development within the Tottenham Court Road growth area should 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 facilities, an excellent public realm and maximising densities.

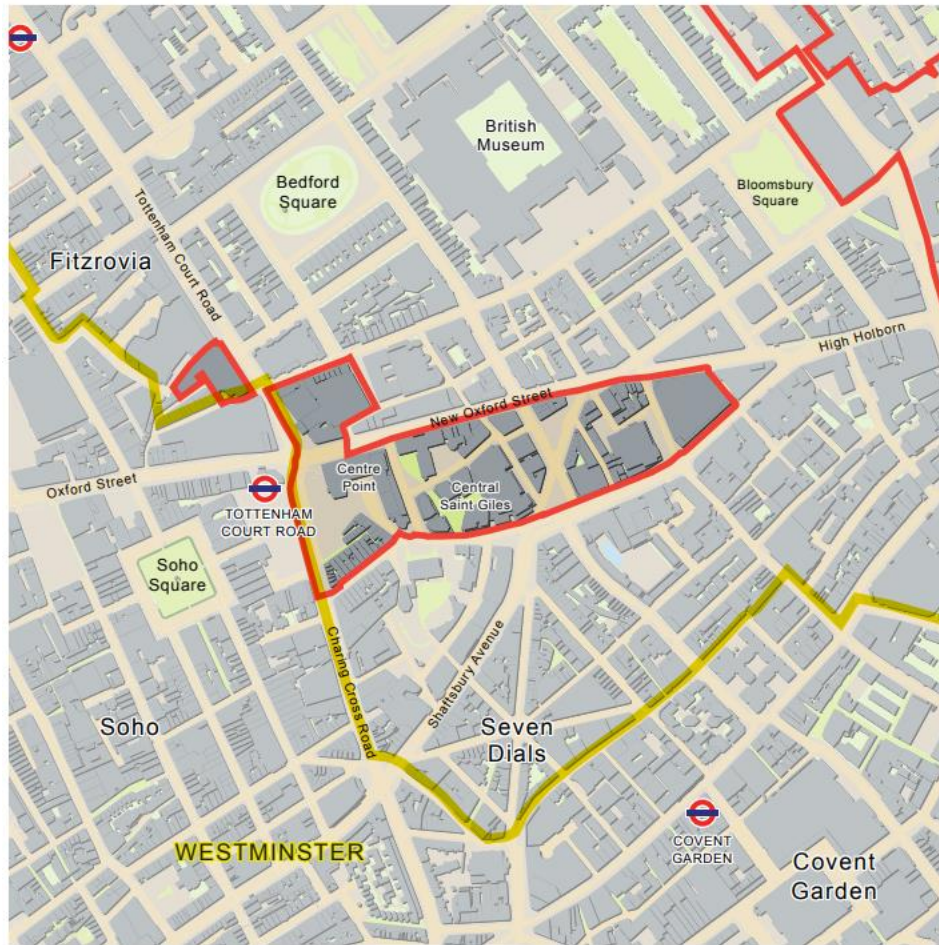


Figure 9 – Tottenham Court Road Growth Area

- 6.7 One Museum Street is identified within the emerging ‘Holborn Vision and Urban Strategy’ (2019) as a ‘Key Project’ for potential redevelopment - it’s location makes it ideally situated to benefit from increased transport capacity and wider connectivity due to the opening of the Elizabeth Line.
- 6.8 Adopted Camden Site Allocations (2013) designate the WCS block for mixed use development by conversion, extension or partial redevelopment for mixed use development.
- 6.9 The emerging site allocations document has not been through examination in public and holds limited weight at this time. The entire application site is included in this document (HCG3). This document allocates the site for mixed-use development including hotel, self-contained homes, offices and retail. This document also states that new buildings should be designed to respond to the site’s varied context, including listed buildings and the Bloomsbury Conservation Area and that any replacement building is of a height and massing that can successfully integrate with the surrounding townscape. This document also says that future development should explore options for providing a public route on the axis with Coptic Street. The supporting text of the policy states that redevelopment of the site offers the opportunity for higher-quality buildings which make better of use of the limited land available by removing the multi-storey car park, redeveloping the podium building and developing the vacant part of the site on West Central Street.

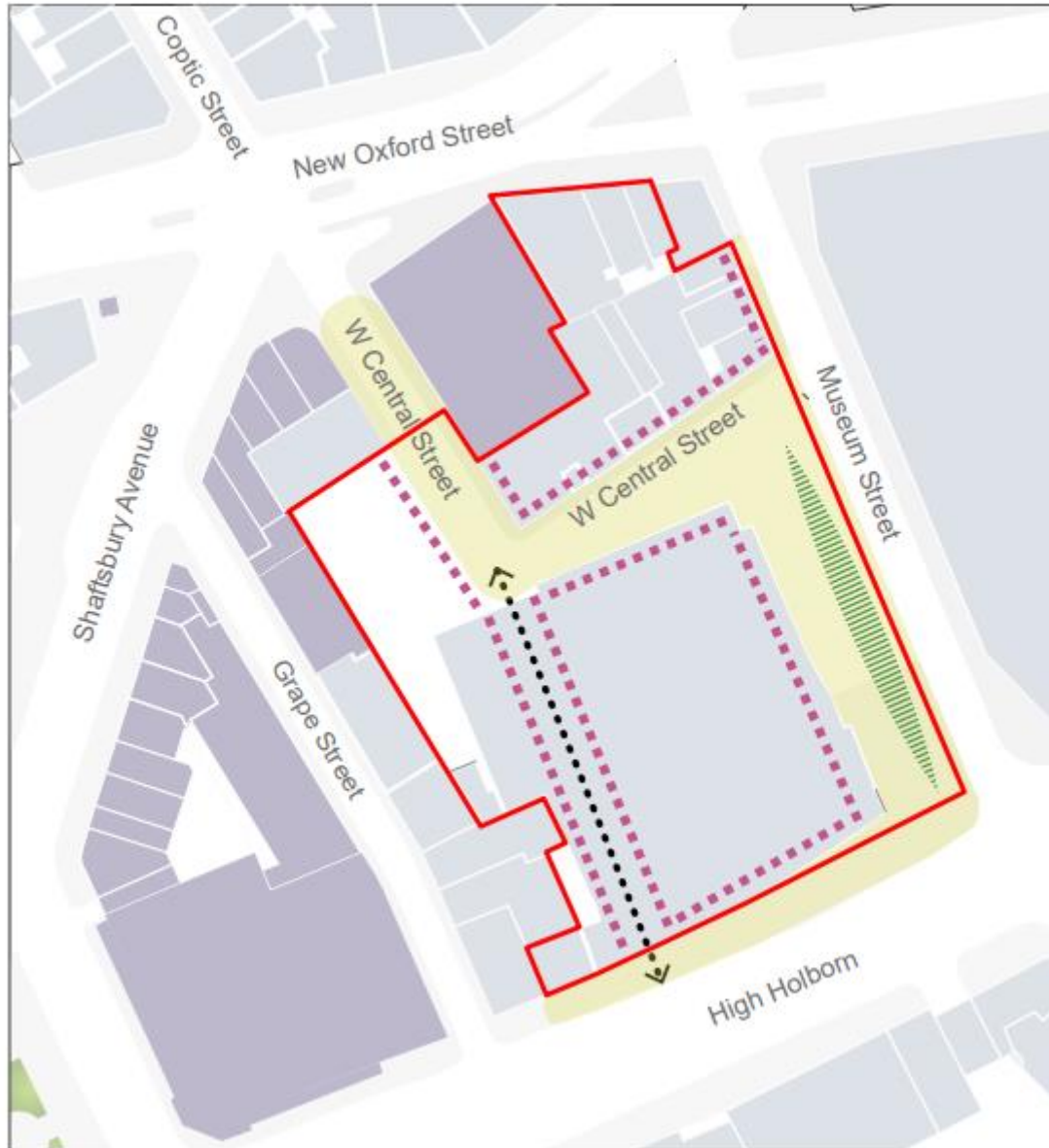


Figure 10 - Draft Site allocation HCG3 – 1 Museum Street

6.10 The principle of an intensification of development in this accessible location to provide new offices, housing, retail and public realm benefits is supported by officers in principle and complies with national, regional and local planning policy.

6.11 The proposals would deliver an uplift of 6,659sqm (GIA) floorspace. Given the above, the principle of demolition and development on the site is considered acceptable in principle, subject to environmental considerations. The acceptability of the density of the development is informed by conservation, design, and amenity issues, as part of a design-led approach. These are assessed in turn in the report below. The acceptability of the demolition of Selkirk House from a sustainability and whole-life carbon angle is also considered separately below.

## 7 LAND USE

7.1 The principal land use considerations are:

- Introduction
- Loss of hotel
- Loss of car park
- Proposed office use (Class E(g))
- Principle of residential use and the mixed use policy
- Loss of HMO accommodation
- Other proposed Class E uses (retail E(a), food and drink (b), other appropriate services in a commercial, business or service locality (c))
- Conclusion

### Introduction

- 7.2 The proposed development is for substantial demolition of the existing buildings on the southern portion of site and redevelopment, as well as works of demolition, alteration and extensions to buildings in the West Central Street block to provide a mixed use but employment-led scheme. The majority of the new floorspace is to provide Class E (Commercial Business and Service) for use as offices (Class E (g)) or at ground floor level for a wider variety of uses and excluding offices. The proposal also includes housing (including affordable housing) which is located within two new buildings on High Holborn and Vine Lane as well as new and refurbished space in the West Central Street block.
- 7.3 A key issue for consideration is the principle of demolition, in both conservation and sustainability terms and they are dealt with in Sections 10 and 18 of the report, this Section deals solely with matters of land use and considers their compliance with the development plan.
- 7.4 The existing and proposed land uses on the site are as follows:

<b>Use Class</b>	<b>Existing (sqm)</b>	<b>Proposed (sqm)</b>	<b>Difference (sqm)</b>	
Hotel (C1)	9,292	-	-9,292	
Car Park	8,037	-	-8,037	
Office (Class E(g))	624	22,650	+22,026	
Hot Food Take Away (Sui Generis/former A5)	190		-190	
Flexible Ground Floor Uses (Use Class E excluding part E(g) use)	N/A	1,667	+ 1,667	+1351
Flexible Ground Floor Uses (unrestricted Use Class E)	502	186	- 316	
Nightclub (Sui Generis)	994	-	- 994	
HMO (Class C4)	97	-	- 97	
Residential (Class C3)	1,817	3,992	+2,175	
<b>Total</b>	<b>21,553</b>	<b>28,309</b>	<b>+ 6,756</b>	

*Figure 11 – Existing and proposed land uses on the site (GIA)*

Loss of hotel

- 7.5 Camden Local Plan policy E3 states that new large-scale tourism development (over 1,000sqm or more) is expected in Central London, particularly the growth areas, including Holborn. Part (e) of this policy seeks to protect existing visitor accommodation in appropriate locations such as Central London and growth areas, where the site is located. London Plan policy E10 relates to Visitor Infrastructure, it recognises the importance of tourism to London and seeks to promote it by ensuring the visitor attractions are easy to reach and complemented by supporting infrastructure including visitor accommodation.
- 7.6 Under the proposals, all of the existing hotel floorspace (9,292sqm GIA) would be lost. The hotel, Selkirk House, was located in the tower on the southern part of the site. Selkirk House comprised 184 rooms and was one of Travelodge's first-generation budget hotels, comprising a 1960s office conversion. The car park and the residential use that were located in the building are discussed below. When the hotel was in operation, it acted as an overspill hotel to the Travelodge Covent Garden, located about 30m to the south, on Drury Lane. Travelodge vacated their overspill hotel on the site in June 2020, as it was considered surplus to requirements and the premises have been vacant since that point in time. Travelodge have continued to operate in the area from their Covent Garden premises. Given the above, there would be no loss of currently operating hotel bedrooms, however the premises still have a lawful use as a hotel and could in theory be used as hotel premises. To do so would require significant investment and upgrading to meet modern standards.
- 7.7 A Hotel Needs Assessment has been submitted as part of this application which demonstrates that Camden has a strong supply of hotel accommodation. In December 2015, there were 18,038 bedrooms, equating to a 12.4% share of the total rooms within London (the second highest after Westminster). Camden has a future pipeline of 1,119 hotel bed spaces approved, significantly more than the amount (184) that would be lost under the proposals. Figures published by Visit Britain include hotel occupancy rates across England by month, in September 2023 occupancy was reported as being 84% in London which is almost back to pre-pandemic levels (occupancy was 87% in 2019). Therefore there remains capacity for growth in tourism. The GLA have also raised no objections to the loss of the hotel.
- 7.8 The loss of the hotel does conflict with the development plan, but it is considered that its loss would not be harmful to the attraction of London to tourists, indeed other elements of the scheme (the active ground floor uses, the new route which provides a more legible link from High Holborn to the British Museum, the improvements to the built environment) are likely to be of benefit. The loss of the hotel is accepted by officers and GLA for the reasons set out above, and given the economic, land use, employment and design benefits that would come forward from the proposals. The employment provision is covered below in 'Proposed office use'.

### Loss of car park

7.9 Policies T1 and T2 seek to promote sustainable forms of development and reduce car use. There is currently a multi storey car park on the site in the lower floors of Selkirk House with a floor area of 8,037sqm. This car park has been vacant, as well as the rest of Selkirk House, since 2020, but it has recently reopened. When officers visited earlier this month the car park was well used, the reopening having brought more cars back into this Central London location to the detriment of sustainability, air quality and health. The car park would be removed under the proposals. The loss of this car parking facility is strongly welcomed in land use, transport and sustainability terms and accords with the development plan.

### Proposed office use (Class E(g))

7.10 Camden Local Plan policy E1 seeks to secure a successful and inclusive economy and encourages economic growth. Policy E2 encourages the provision of employment premises and sites. London Plan policy SD4 supports the enhancement and intensification of offices, to meet demand for a range of types and sizes of occupier and rental values, especially in the CAZ. The supporting text of policy G1 (Delivery and location of growth) seeks a balanced mix of uses, including housing and affordable housing, significant provision of offices and other employment opportunities in the Tottenham Court Road growth area.

Use Class	Existing (sqm)	Proposed (sqm)	Difference (sqm)
Office (Class E(g))	624	22,650	+22,026

7.11 There would be a significant increase of 22,026sqm in office floorspace (and an uplift of 22,650sqm of Class E floorspace in total – including non-office uses). This would be located in the upper floors of the proposed tower building, on the site of the existing Selkirk House tower. This quantity of floorspace triggers the Council's planning policy requirements around affordable workspace (the threshold being 1000sqm) and end use/occupier phase obligations.

7.12 A Socio-Economic Assessment has been submitted as part of the application. This document states that there is demand and there are opportunities for offices in this area. The Council's Inclusive Economy section have confirmed that there is still demand for offices, partly from a demand for quality office space and partly pent-up demand during the pandemic. Flexible, sustainable and high-quality office space that accommodates a range of working tasks is still in demand in Central London. The draft employment land study (June 2023) commissioned to inform the local plan review states that "*Net absorption provides another angle on demand, and while there were negative net absorption rates from 2020 to 2022, positive absorption rates in 2022 indicates that, overall, conditions within the office market are back to being favourable. This observation is corroborated by consultation with land agents, who attest to the strong demand for Grade A space in particular*".

7.13 The proposals would provide employment for 1,386 people (full time equivalent). Officers recognise and welcome the increased employment opportunities that the scheme would create in the construction and end-use phases. It is welcome that the developer has already had discussions with the Council's Inclusive Economy Team around opportunities for residents in both operational construction roles, together with design and management.

- 7.14 With regards to affordable workspace, the applicant is proposing 649sqm of affordable retail at 50% discount on market rent for 25 years and 186sqm of flexible use ancillary workspace. This space forms part of the overall amenity workspace offer to One Museum Street occupiers. This space would serve 'wider Camden small business, social enterprise and charitable sector' by being made available free of charge on a bookable basis for 20% of the time during core building hours (8am-6pm) and additionally at evenings and weekends. The space would be designed to be flexible to enable a range of uses such as meetings, training, product launches, presentations, networking events, workshops, large gatherings, the uses all being within planning Use Class E.
- 7.15 The applicant argues that an affordable retail offer is preferable to a co-working office-type offer because affordable retail is more likely to be attractive and accessible to local people and businesses and present a more diverse offer and active ground floor for the area than office space. They also state that the quantum of affordable space is smaller than workspace operators are likely to find workable. This affordable offer calculates as 10% of the commercial floorspace uplift of the Class E uplift. The applicant will develop eligibility criteria for the occupation of the affordable space based on local links and business size – e.g. Qualifying occupiers to include Camden based businesses or residents. The applicant proposes a marketing and occupation strategy which will specifically target local people and businesses and commit tenants to social value obligations to be agreed.
- 7.16 Policy E2 does not set out the amount of affordable workspace that is required or the terms on which it should be secured, it recognises that what is secured will vary according to a number of factors. Camden Planning Guidance Employment sites and Business Premises (2021) also acknowledges that it should be considered on a case by case basis through discussions with the Inclusive Economy team. Inclusive Economy Section has been consulted and welcomes the increased employment opportunities in the construction and end-use phases, through the expansion of the existing employment floorspace on site. Officers are supportive of the proposal to deliver the affordable commercial element as retail space which would support local start-up and small retailers. Officers also support the proposal to develop a marketing strategy which would engage local business networks and target businesses that are currently using temporary space such as pop-up shops, market stalls and spaces booked by the hour.
- 7.17 The flexible lease terms suggested by the applicant are also welcomed but would suggest further flexibilities such as a shared risk/profit share approach with a basic service charge paid. This approach has been taken by Argent at Kings Cross to encourage a mix of independent businesses across their site. Officers are supportive of the bookable training space idea. This would require a robust marketing plan, which would be secured via section 106, which resources ongoing programming and engagement with local groups and stakeholders to raise awareness of the offer.
- 7.18 All of the affordable workspace elements (649sqm of affordable retail at 50% discount for 25 years and 186sqm of flexible use ancillary workspace), including the provision of operational and marketing plans to be approved by the Council, would be secured by Section 106 agreement.

7.19 A strong package of employment and training obligations for both the construction and end use phase would be secured through a Section 106 legal agreement (see section on Planning obligations).

#### Residential and HMO use

7.20 Camden Local Plan policies H1, H2, H3, H4, H6, H7, H10 and Camden Planning Guidance 2 (Housing) are relevant with regard to the provision of housing, including affordable housing. Policy H2 is the mixed use development policy and that requires 50% of all additional floorspace to be residential in the Central London Area. The site is within the Central London Area. Policy H1 of the London Plan sets housing targets for local authorities in London, for Camden the target is 1038 per year for the 10 year period. In order to ensure that housing targets are met Policy H1 states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through development plans and planning decisions.

7.21 Camden's most recent Housing Delivery Test assessment (for 2021) indicated that only 76% of the required homes had been delivered over the previous 3-year period. Our recently published Authority Monitoring Report for 2018-2021 confirms that Camden does not currently have a full five-year supply of housing land (after taking into account the required buffer and past under-delivery). Consequently, paragraph 11, 'the tilted balance', of the National Planning Policy Framework is engaged. This means that there is a presumption in favour of granting the development, which would deliver housing, unless the policies in the framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework as a whole. Effectively what this is saying is that it should be approved unless the impact on heritage assets provides a clear reason for refusal or all the adverse impacts outweigh the public benefits (this is considered further in the Conclusion).

7.22 The existing buildings on the site do include some existing, albeit vacant, residential accommodation. The 14<sup>th</sup> and 15<sup>th</sup> floors of Selkirk House provided 11 maisonettes (1322sqm) which have a lawful use as Class C3. The West Central Street block also includes residential within 10 and 12 Museum Street. There is a further 495sqm of Class C3 floorspace at 12 Museum Street which was laid out as 20 flats, all severely substandard compared with contemporary space standards.

7.23 The nature of the residential use and planning history for 10 Museum Street is slightly unclear, whilst there is no record of it being granted permission for use as a House in Multiple Occupation (HMO) it is clearly referred to as such in committee reports relating to earlier applications for the site. Local residents refer to it as and HMO and affordable housing. Whilst it is accepted that as an HMO it would have provided cheaper accommodation there is nothing to indicate that planning controls existed to restrict it as affordable housing. An HMO can be classified as Class C4 or Sui Generis depending on the number of occupiers, given the size of this property (97sqm) it is accepted it is mostly likely to have been classified as Class C4 and has been treated as such in the assessment of this application.

7.24 Local Plan Policy H10 seeks to resist development involving the net loss of housing with shared facilities or HMOs because it is accepted that it provides a cheaper form of accommodation and is often all some individuals or couples can afford. The



proposal would involve the loss of a 97sqm HMO (Class C4) with 6 rooms at 10 Museum Street. Policy H10 sets out the criteria where the loss of shared housing would be accepted. It would accept loss where the standard of the accommodation is poor, where shared housing is being reprovided or where the lost floorspace is being provided as affordable housing. In this case it is considered that the existing accommodation does not provide a good standard of living for occupants. The expectation is that the Class C4 HMO floorspace is reprovided as Class C3 residential floorspace and for this to be secured as affordable housing in accordance with Policy H10.

7.25 As existing housing is protected under Policy H3 of the Local Plan and taking account of the need under Policy H10 to reprovide the HMO accommodation as Class C3 residential, in total there is 1914sqm of Class C3 residential floorspace which would need to be reprovided as part of any development proposal for this site. 97sqm of that floorspace would need to be secured as affordable housing. This floorspace does not count to the residential floorspace required under the mixed use policy H2 or the affordable housing policy H4.

Use Class	Existing (sqm)	Proposed (sqm)	Difference (sqm)
HMO (C4)	97	-	- 97
Residential	1,817	3,992	+2175

*Figure 12. Residential floorspace*

7.26 The proposed development includes the provision of 44 dwellings which would be provided as follows:

- West Central Street block – 21 dwellings
- Vine Lane block – 19 dwellings
- High Holborn block – 4 dwellings

7.27 The total amount of residential floorspace provided is 3992sqm. Taking account of the fact that the development must reprovide 1914sqm of Class C3 residential floorspace the residential uplift is 2078sqm. Policy H2 of the Local Plan requires that where employment led development is proposed in the Central London Area and it includes an uplift of more than 200sqm that 50% of all additional floorspace should be in the form of self-contained accommodation. The proposed employment led development for the application site will provide an uplift of 6,756sqm (GIA) of floorspace and therefore there is a requirement to provide 3,378 sqm (GIA) of this as Class C3 residential floorspace. The proposed development does not meet the policy requirement, there is a shortfall of 1,300sqm (GIA), it is providing only 61% of the policy requirement and there is a 29% shortfall.

7.28 As stated above, residential use is the Council's priority land use. The proposed development does ensure that there is no loss of existing residential accommodation and it increases the amount of housing on site, which is welcomed and complies with policy H1 and H3, but it fails to provide the full quantum of residential required under the policy H2. The proposed residential accommodation has been provided within the block onto High Holborn, Vine Lane and within the West Central Street block. It would not be possible to increase the scale of these buildings further to provide additional homes as it would have negative consequences in terms of

heritage/townscape, impact on amenity and the quality of accommodation which could be provided. There may be the potential to provide further housing in the tower but is not considered desirable as it would reduce the amount of commercial floorspace. The aim of Policy H2 is to try and ensure that even in Central London that we create mixed environments, whilst the proposal does not fully comply with the 50% requirement it does provide a good balance between providing commercial floorspace offering new job opportunities and new homes.

- 7.29 Policy H2 states that where it is accepted that it would not be possible to meet the full housing requirement on-site, we should seek provision off-site or exceptionally a payment in lieu. Under the Housing CPG (2021), the Council would seek a payment-in-lieu equivalent to the 1,300sqm shortfall of market housing, or 1,300 x £1,500psm = £1,950,000.
- 7.30 A Financial Viability Assessment (FVA) has been submitted as part of this application, which states that the scheme is in deficit and cannot afford to make this payment. BPS, the Council’s independent viability consultant has reviewed the proposals and interrogated the FVA. BPS agree that the scheme would not be able to provide any further housing contributions at this stage and have recommended a late-stage review is undertaken in line with Policy H2 to assess whether the scheme’s viability improves in the future.
- 7.31 A Benchmark Land Value has been agreed between BPS and the applicant’s viability consultant of £49.8 million.

<b>Viability summary</b>	
Affordable housing floorspace (%)	1,693sqm
Benchmark Land Value (BLV)	£49,801,000
Gross development value (GDV)	£395,830,016
Construction Costs	£196,089,000
CIL and planning obligations	CIL - £2,741,644
	S106 - £3,500,000
Other costs (fees, disposal, finance)	£93,532,477
Developer profit (% of GDV)	15.13%
Residual Profit Output	£25,712,367
	(compared to profit target at 15.13% i.e. £59,883,716 = -£34,171,349)

*Figure 13. Viability summary*

The proposed late stage viability review, which will include reference to the Benchmark Land Value (BLV) will be secured by S106 legal agreement and in the event that viability improves a deferred housing payment to the affordable housing fund would be secured to a cap of £1,950,000. Please see Section 8 which deals more specifically with the spending of secured funds and First Homes.

Flexible Class E (commercial, business or services – except offices)

- 7.32 Camden Local Plan policy TC1 encourages shopping and related uses in Camden’s designated growth areas, such as the Tottenham Court Road growth area.

7.33 Class E town centre uses would be provided across the ground floor of the scheme. The focus is on small retail, food & beverage and other Class E uses.

Class	Existing (sqm)	Proposed (sqm)	Difference (sqm)
Flexible Ground Floor Uses (Use Class E) (except offices)	502	1,667	+ 1,165

Figure 14. Commercial ground floor use

7.34 The Holborn Vision and Urban Strategy is an emerging supplementary planning document. The draft document was consulted on in 2019, but further work on it has to be paused during the pandemic, work on it has recently recommenced and it is expected that there will be further consultation early next year. The strategy also encourages town centre uses and active frontages in this location. The proposed development would provide active frontages across the ground floor of the proposed development. The provision of Class E uses at ground floor is welcomed.

7.35 The proposal would result in the loss of a hot-food takeaway, but there is no policy which specifically seeks their retention. The replacement with Class E space which could be used to provide a combination of retail and food & beverage would be more desirable and less impactful on existing and new residents.

### Conclusion

7.36 The existing buildings on the site provide a mix of uses, much of which is poor quality and sub-standard in its current condition. The proposed development seeks to replace some of the uses (residential), but would result in the loss of the hotel and the car park. The loss of the existing hotel is contrary to policy but is accepted given the number and supply of hotel rooms in the area and those coming forward in the pipeline as well as that the hotel was ancillary to another hotel and is vacant. The loss of the multi-storey car park is welcomed and would have many positive benefits in sustainability, land use and design terms. The proposed office use is strongly welcomed and will bring economic, employment and training benefits to the area. The provision of replacement good quality residential use and an uplift is welcomed given it's the Council's priority land use. It is acknowledged that the housing requirement falls short of the 50% target in Policy H2, providing only 61% of the requirement, but it is considered that the applicant has sought to maximise delivery on those parts of the site identified for housing provision and that the overall package provides a good balance of commercial and residential uses in the right locations on the site. The active ground floor created by the Class E uses is also welcomed.

7.37 Class E is a very wide use class, which can be used for a wide variety of commercial, business and service uses. Controls would be imposed to restrict the nature of Class E uses in different parts of the development, this is to ensure that the approved land use package comes forward in the manner expected and that an active frontage is

retained at ground floor level. The upper floors would be conditioned as offices and the lower floors as flexible town centre uses (except offices).

## **8 TENURE AND UNIT SIZE MIX OF THE PROPOSED HOUSING**

8.1 The considerations with regards to tenure and unit size and mix are as follows:

- Policy review
- Affordable housing
- First Homes
- Mix of unit sizes
- Conclusion

### Policy review

8.2 Policies H4, H6, H7 and CPG2 (Housing) are relevant with regards to the tenure and unit size of new housing. Local Plan Policy H4 sets an affordable housing target of 50% for schemes with a capacity to provide 25 or more additional homes, being those involving 2,500 sqm of housing or more. Where the capacity is less than 25 homes, a sliding scale applies starting at 2% for one home and increasing by 2% for each home. The policy also sets a guideline split of 60% social-affordable rented housing and 40% intermediate rented housing. The London Plan policy H5 offers a fast track approach with 35% affordable housing (viability assessment not required) but only where other relevant policy requirements and obligations are met to the satisfaction of the borough. In this case as there is a failure to fully comply with Policy H2 of the Local Plan to deliver 50% of the uplift as housing, it is not considered that this scheme would not benefit from the fast track.

### Affordable housing

8.3 The proposal includes the provision of an additional 2,078sqm of residential floorspace area. The site therefore has the capacity for 20 dwellings and the affordable housing target is 40% which is 831.2sqm. In addition the scheme has to re-provide 97sqm of the Class C3 floorspace to offset the loss of the HMO so the policy requirement would be 928.2sqm.

8.4 If the scheme had been policy compliant in terms of the overall amount of housing provided under policy H2 it would have been required to provide 3,378sqm (GIA) of Class C3 residential floorspace. This would have meant that the housing capacity would have been 34 homes, and the affordable housing target would 50% or 1,689sqm. Again it would have been necessary for the scheme to re-provide the lost HMO space of 97sqm so the full affordable housing requirement would have been 1786sqm.

8.5 The proposed development includes the provision of 19 affordable housing units providing 1,693sqm of floorspace (97 sqm of which is required to offset the loss of the HMO – so 1596sqm against Policy H4) which significantly exceeds the requirement under policy H4 based on the quantum of housing proposed and which falls only just short of what would have been required if Policy H2 had been complied with. The reason for this is that the applicant, aware of the fact that the scheme provides less housing overall than required by policy has sought to ensure that they are prioritising the delivery of affordable housing. 76.8% of the additional housing floorspace proposed would take the form of affordable housing. This is welcomed in

this location south of Euston Road where it is often more difficult to deliver affordable homes.

- 8.6 The proposed development will provide 19 affordable homes, 12 Low Cost Rent homes (social-affordable rent) and 7 intermediate homes. In terms of policy H4's 60-40 guideline split, the proposal involves 1,103sqm of social-affordable housing (65.2%) and 590sqm of intermediate housing (34.8%). The modest over-provision of social-affordable housing is welcome, and reflects the mix of dwelling sizes proposed and the priorities of the Local Plan 2017 and CPG Housing 2021, with the majority of the 1-bedroom affordable homes being provided for intermediate rent, and all the larger affordable homes being provided for social-affordable rent. The proposed rent levels for the accommodation are in accordance with Camden's policies and guidance.
- 8.7 The affordable housing would all be provided on site, in the West Central Street block on floors 1 – 3. It is desirable for Affordable Housing units to be located in a separate core from the Private Sale units, as this makes management of affordable housing easier for the Registered Provider and helps keep service charge levels to a minimum. The applicant is in discussion with Origin Housing as the potential Registered Provider of affordable housing on this site.

#### First Homes

- 8.8 The national First Homes policy has now come into effect for developments that trigger an affordable housing contribution. First Homes are a new type of discount housing for sale. National policy indicates that First Homes should form 25% of the affordable housing sought in a development, and that where a payment in lieu (PIL) is sought in place of affordable housing, 25% of the value should be used to deliver First Homes. However, the Council has adopted a Planning Statement on the Intermediate Housing Strategy and First Homes, which indicates that First Homes in Camden would not be affordable to median income residents, and consequently First Homes will not be sought in the borough. Having regard to the national and local policies relating to First Homes, and the Council's preferred affordable housing types identified by Local Plan Policy H4 and CPG Housing 2021, we consider it appropriate that the affordable homes provided in this development, and any homes funded by deferred affordable housing contributions, should take the form of social-affordable rented housing (known as Low Cost Rent in the London Plan 2021) and intermediate rented housing.

#### Mix of unit sizes

- 8.9 Local Plan Policy H7 seeks a mix of large (3-bedrooms or more) and small homes in each development, and seeks schemes that address priorities set out in a Dwelling Size Priorities Table.

**Table 1: Dwelling Size Priorities**

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

8.10 The highest Dwelling Size Priorities are 2-bed and 3-bed homes in the market and social-affordable rented sectors, but 1-bedrooms/ studios in the intermediate rented sector. Medium priority is given to 4-bed homes for social-affordable rent and 2-bed 4-person homes for intermediate rent.

8.11 The Housing CPG Jan 2021 (para 3.38/ Figure 1) indicates that in the social-affordable rented sector, we will seek 20% 4-bedroom homes, 30% 3-bedroom homes (or up to 50% if our preferred percentage of 4-bedroom homes is not provided), 35% 2-bedroom homes, and no more than 15% 1-bedroom homes.

8.12 The Housing CPG Jan 2021 (para 3.44/ Figure 2) indicates that in the intermediate rented sector, we will seek a substantial proportion of studio or 1-bedroom homes, and a proportion of homes genuinely suitable for sharers (2b4p homes, ideally with two bathrooms or shower-rooms).

8.13 The proposed mix of residential accommodation, across tenures, is set out below:

	Social Rent	Intermediate	Market	Total
1 bedroom	4	7	19	30
2 bedrooms	6	0	3	10
3 bedrooms	-	-	3	3
4 bedrooms	1	-	-	1
5 bedrooms	1	-	-	1
<b>Total</b>	<b>12</b>	<b>7</b>	<b>25</b>	<b>44</b>

*Figure 15. Proposed residential mix*

8.14 In terms of private housing the proposed development would deliver 3 large homes (3 x 3b5p homes) and 22 small homes (19 x 1b2p homes, 1 x 2b3p home and 2 x 2b4p homes). In view of the small size of the existing 20 market homes (all studios) in the West Central Street block and relatively small size of the 11 maisonettes in

Selkirk House (1 or 2-bedroom), the proposed mix of market homes is considered to be acceptable and achieves a sensible compromise between the provision of a mix which includes large homes and retention of as many homes as possible.

- 8.15 The proposed mix of intermediate rented homes (7 x 1b2p) is broadly consistent with the Local Plan Dwelling Size Priorities and Housing CPG Jan 2021 (para 3.44/ Figure 2), although it is noted that the proposal includes no studios and no 2-bedroom homes suitable for sharers, so they will all be expected to provide for households with incomes of £42,675 gross per year or more, but this remains within the agreed range set out in the Intermediate Housing Strategy
- 8.16 In the social-affordable rented sector, the proposal involves 2 large homes (1 x 4b8p home and 1 x 5b7p home) and 9 smaller homes (3 x 1b2p homes, 6 x 2b3p homes). The provision of a number of large units is welcomed.

### Conclusions

- 8.17 As was set out in the previous section of this report, the proposed development fails to deliver the full amount of housing required under policy H2, but as this section makes clear the applicant has sought to compensate for this deficiency by over-providing affordable housing. The quantum of affordable housing provided is very close to the amount that would have been required had the full amount of residential been provided in the scheme and significantly more than 50% of the additional residential floorspace which has been included. This is welcomed given the significant need for affordable housing in the borough and the challenges often encountered in delivering them in the south of the borough. The tenure split between social rent and intermediate by floorspace does not fully accord with policy, but is weighted in favour of social rented because of the large family units which have been provided, again this is considered to be acceptable given the need for larger social rented homes. Officers welcome the engagement of a Registered Provider at this stage in the process.
- 8.18 The proportion of small market homes (particularly 1-bedroom homes) is considered to be acceptable given the large number of existing small (sub-standard) market homes on the site and the Policy H1 requirement to maximise housing delivery. The mix of intermediate rented homes is consistent with Local Plan's Dwelling Size Priorities Table and considered to be acceptable. Amongst the social-affordable rented homes, the two very large homes are welcomed. The absence of any 3-bedroom homes is offset by provision of 3 x 2b4p social-affordable rented homes that could be suitable for growing families.

## **9 QUALITY OF THE PROPOSED RESIDENTIAL ACCOMMODATION**

- 9.1 The considerations with regards to the amenity of the proposed housing are as follows:
- Policy review
  - Daylight, sunlight and aspect
  - Design and layout
  - Accessible housing
  - External amenity space
  - Noise

- Conclusion

Policy review

- 9.2 Camden Local Plan policies A1 and A4 and the Amenity CPG are all relevant with regards to the amenity of proposed residential properties, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impact from construction works are also relevant but dealt with in the 'Transport' section. Proposed dwellings should provide a quality of life for prospective residents in line with these policies.

Daylight, sunlight and aspect

- 9.3 A daylight/sunlight report has been submitted, detailing the daylight and sunlight levels of the proposed new residential accommodation against the relevant BRE guidelines. An independent lighting consultant, Delva Patman Redler, was appointed by the Council to review this document and advise on the accuracy of the information and the conclusions.
- 9.4 Local residents commissioned their own daylight/sunlight assessment of the proposed accommodation, including overshadowing to external spaces. This report concludes that the proposed development does not provide adequate daylight/sunlight for future occupiers and recommends mitigating factors to improve light levels.
- 9.5 Paragraph 125 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards. Paragraph 125 also states that proposals should avoid homes being built at low densities, and ensure that developments should make optimal use of the potential of each site. The GLA Housing SPG recommends that "An appropriate degree of flexibility needs to be applied when using BRE Guidelines to assess the daylight and sunlight within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."
- 9.6 The proposed residential accommodation within the scheme was assessed in accordance with the BRE guidelines (2022) which considers the new Spatial Daylight Autonomy (sDA) metric. In addition, all units have been assessed for their access to sunlight, where BRE prescribes 1.5 hours within at least one room per unit.
- 9.7 It is recognised that the application site is located in a dense urban setting, with conservation and amenity constraints. Nevertheless, the proposed residential accommodation must provide a decent level of amenity to prospective occupiers, in accordance with the above guidelines.
- 9.8 There are 122 habitable rooms proposed overall; 68 in the WCS block, 41 in the new Vine Lane Building and 13 in the new High Holborn Building. A summary of the results of compliance with BRE guidelines is located in the table below.



Address	Daylight compliance per habitable room	Sunlight compliance per flat
West Central Street	12/68 (18%)	10/21(38%)
Vine Lane	5/41 (12%)	3/19(16%)
High Holborn	4/13(31%)	2/4(25%)
OVERALL	21/122(17%)	15/44(34%)

Figure 16. Light compliance summary

- 9.9 Only 21 out of the proposed 122 habitable rooms would meet or exceed the BRE guidelines.
- 9.10 The constrained layout of the development results in low daylight compliance. It is worth noting that new BRE standards are much harder to comply with than the previous standards. The daylight and sunlight targets set out in the standards are applied to the whole of the UK, rather than being specific to a dense Central London context, and are generally more applicable to a suburban setting. It would not be possible, nor desirable to meet the guidelines fully in a location such as this, unless we were seeking to create a low-density suburban development in the heart of Central London which would of course conflict with local, regional and national policy.
- 9.11 The proportion of affordable dwellings with low daylight in all rooms is 37% (7 out of 19 dwellings) which compares to 60% (15 out of 25 dwellings) for the market dwellings. The daylight performance within the affordable dwellings has been prioritised. Habitable rooms have also been prioritised across all tenures.
- 9.12 The lower daylight levels within three of the affordable dwellings and one market dwelling are as a result of these buildings being retained buildings which are being converted. These buildings already have residential use. Nine dwellings would be accommodated in the retained listed buildings in the West Central Street block. Given heritage constraints, it would not be possible to increase fenestration or amend the layout of the floorplates to improve light received.
- 9.13 17 (four affordable and 13 market) dwellings with lower daylight levels in all rooms have one or more of their rooms obstructed by a balcony or access deck. Lower daylight levels in such situations are considered to be acceptable, given the external amenity space benefits of the balconies.
- 9.14 The daylight levels in the proposed development are not considered unusual for a dense urban setting.
- 9.15 Sun on ground has also been considered for the two proposed amenity spaces within the scheme. The assessment demonstrates that the amenity area beside the proposed Vine Lane building would receive the minimum BRE recommendations of two hours of direct sunlight to 78% of the area on the 21st of March. The amenity area at West Central Street would not meet these guidelines, seeing less than two hours of sunlight to its entire area on this date. The courtyard arrangement restricts sunlight outside of the summer months and so an additional assessment has been

run on the 21st of June. This demonstrates that the West Central Street courtyard amenity area would receive more than two hours of direct sunlight to the majority of its area on this date. The space has been designed to maximise opportunity for summer sunshine taking account of its location on the north side of the development. Significant changes would be required for the development to meet the BRE guidelines for March guidelines for the 21<sup>st</sup> of March, which would substantially reduce the housing provision.

- 9.16 The proposals have been design to maximise dual aspect, taking account of heritage considerations. The only single-aspect units are in the refurbished listed buildings. The proposed flats would have an acceptable outlook and it is welcomed that the proposals maximise the inclusion of dual aspect units.

### Design and layout

- 9.17 Part of the design-led approach to delivering effective high-density housing is about ensuring the development does not compromise the size and layouts of units, ensuring high quality homes across the scheme. The CLP policy H6 confirms that new residential development should conform to the Nationally Described Space Standards, and this is reflected in LP policy D6 which sets the same minimum space standards in Table 3.1 of the London Plan 2021. The relevant excerpt from the table is reproduced below in Table 19.

Type of dwelling		Minimum gross internal floor areas* and storage (square metres)			
Number of bedrooms (b)	Number of bed spaces (persons(p))	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *	N/A	N/A	1
	2p	50	58	N/A	1.5
2b	3p	61	70	N/A	2
	4p	70	79	N/A	2
3b	4p	74	84	90	2.5
	5p	86	93	99	2.5
	6p	95	102	108	2.5
4b	5p	90	97	103	3
	6p	99	106	112	3
	7p	108	115	121	3
	8p	117	124	130	3
5b	6p	103	110	116	3.5
	7p	112	119	125	3.5
	8p	121	128	134	3.5
6b	7p	116	123	129	4
	8p	125	132	138	4

Figure 17 – Table 3.1 of the London Plan - Minimum internal space standards for new dwellings

- 9.18 With the exception of one unit, all of the proposed units meet the London Plan minimum space standards and the Nationally Described Space Standards both in terms of overall size and bedroom size. The proposed residential units have been designed to a high standard. The unit which does not comply is a market unit and is located within one of the recently listed buildings on the site, within 35 New Oxford

Street. The shortfall is only 2sqm. Given how small the shortfall is and that the building's heritage status means it cannot be substantially altered in order to comply with space standards, this shortfall is acceptable.

#### Accessibility

- 9.19 Local Plan Policy H6 seeks 90% of new-build homes to satisfy Building Regulations Part M4(2) (accessible and adaptable) and 10% of new-build homes to satisfy Building Regulations Part M4(3) (fully accessible to people using wheelchairs). Within the latter category, 10% of new-build homes for social-affordable rent should be fully wheelchair accessible to satisfy Building Regulations Part M4(3)(2)(b).
- 9.20 Para 3.155 indicates that the Council will round the number of homes required in each category to the nearest whole number such that the total requirement for M4(2) and M4(3) dwellings adds up to 100%, and that the Council will not require M4(3) wheelchair user dwellings as part of developments that provide five additional dwellings or fewer.
- 9.21 The Housing CPG Jan 2021 (para 3.38/ Figure 1) indicates that we will particularly seek wheelchair user dwellings in the social-affordable rented sector in the form of 2-bedroom 4-person homes and 3-bedroom 5-person homes or 3-bedroom 6-person homes. This is to better provide for families with a child who is a wheelchair user, since wheelchair users find it easier to occupy double-bedrooms.
- 9.22 The accessible homes required are thus 4-5 homes to M4(3) and 39-40 homes to M4(2). However, in this instance, no lift can be provided to the 4 homes in High Holborn, and these can only meet M4(1). Consequently, additional M4(3) homes have been offered as compensation elsewhere.
- 9.23 Five units would be wheelchair user dwellings (compared with 3 to 4 required by Policy H6). These would be:
- 2 x 2b4p market units to M4(3) at Vine Lane.
  - 3 x 2b3p social-affordable units to M4(3) at 18 West Central Street – one of which will be fully wheelchair accessible to M4(3)(2)(b).
- 9.24 The dwellings in the listed buildings cannot be brought up to M4(2) standards for heritage reasons. The remaining M4(2) units (27) would be 17 market units at Vine Lane, 3 social-affordable units at 16A West Central Street (plus 1 x M4(3)(2)(b)), 3 social-affordable units at 18 West Central Street (plus 1 x M4(3)(2)(b), and 4 intermediate rent units at 16B West Central Street.
- 9.25 The inclusion of 2 x 2b4p social-affordable rent units here (in place 2b3p of M4(3) adaptable units) would help to offset the absence of 3b social-affordable rent. The inability of the homes in High Holborn to meet Part M4(2) is acceptable given the constrained footprint of the block and its inability to reasonably provide a lift.
- 9.26 Two social-affordable rented homes would be fully wheelchair accessible under Part M4(3)(2)(b). This would be 1 x 1b2p homes and 1 x 2b3p home. This proposed mix does not wholly satisfy the guidance in Housing CPG Jan 2021 that wheelchair user homes in this sector should ideally be 2-bedroom 4-person homes, 3-bedroom 5-person homes or 3-bedroom 6-person homes, but is considered to be acceptable in

the context of the overall proposals and affordable housing offer, given the heritage and space constraints of the site. The two M4(3)(2)(b) social-affordable rented homes for wheelchair users are particularly welcome, as this provision exceeds the requirement for 10% wheelchair user dwellings in this tenure. Conditions are attached to ensure compliance with M4(2) and M4(3).

9.27 Much of the landscape would be regraded under the proposals. Where steps are proposed, sufficient step-free alternatives are to be provided.

#### External amenity space

9.28 A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. The proposed amenity spaces are distributed at all levels of the development, with public ground floor spaces accessible to all. A courtyard would provide external amenity space at ground floor level for occupants of dwellings in the West Central Street block. Playspace is provided within this courtyard. A terrace is proposed on the roof of the Vine Lane block at fourth floor level. . The majority of the proposed units have private external amenity space in the form of balconies and terraces. There are nine affordable and private units within the West Central Street block and three private units within the High Holborn building which do not benefit from private amenity space. The units located in the listed WCS block will not have any private external amenity space, given the heritage constraints. It is also noted that these buildings already have residential within them, without external space. The three units that are proposed within the High Holborn block are duplex flats with a small, constrained footprint. It would not be possible to provide balconies on High Holborn, given the poor air quality here. Given the constraints of the location of these flats, it is acceptable that they do not have external amenity space.

#### Noise

9.29 Conditions are attached regarding insulation and maximum noise levels for plant. Subject to these conditions the proposed flats would be acceptable in terms of noise.

#### Conclusion

9.30 The proposed flats are considered acceptable in terms of aspect, outlook, noise and amenity space and would provide an acceptable level of amenity. The daylight levels are considered acceptable for this dense, Central London location.

## **10 CONSERVATION AND HERITAGE**

10.1 The conservation considerations are as follows:

- Policy review
- Historic development and surrounding townscape
- Summary of significance
- Summary
- Site and setting
- Proposal and assessment
- Internal alterations to listed buildings
- Conclusion – Impact on significance
- Archaeology

#### Policy review

- 10.2 Policies D1, D2 and CPG (Design) of the Camden Local Plan are relevant to conservation and design. The supporting text of policy G1 (Delivery and location of growth) seeks development of the highest quality, as befits this historic area (Tottenham Court Road growth area). The London Plan, chapter 7 is also relevant, in particular policies HC1 – HC4. Policy D9(C) on tall buildings is also relevant and states development should avoid harm to heritage assets and their settings, which will otherwise require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.
- 10.3 Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”) are relevant with regards to impacts on heritage assets. Section 72(1) requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area and S.66 imposes a similar requirement in relation to listed buildings and their settings when considering applications relating to land or buildings within that area. The effect of these sections is that there are statutory presumptions in favour of the preservation of the character and appearance of Conservation Areas and the setting of listed buildings.
- 10.4 The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (section 12). Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced. Para 195 states that local authorities, when considering proposals that affect a heritage asset, should seek to avoid or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal. Para 197 states that In determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - c) the desirability of new development making a positive contribution to local character and distinctiveness.

Para 199 states that when considering the impact of a proposed development on a heritage asset (including through its setting), local planning authorities should give ‘great weight’ to preserving the asset’s significance (and that the more important the asset the greater the weight should be). The decision-maker must give “considerable importance and weight” to any finding of harm, and any harm or loss requires clear and convincing justification (paragraph 200). The NPPF states in para 202 that where less than substantial harm is identified, it should be weighed up against any public benefits and that considerable importance and weight must be attributed to the harm in such balancing exercise. Para 203 states that a balanced judgement on the effect of proposals on non-designated heritage assets is required, having regard to the scale of harm that would be caused to them

### Historic development and surrounding townscape

- 10.5 The area around the site has a mixed townscape character and much of it has seen a significant amount of change with huge variety in the height and scale of buildings around the site as well as between the individual buildings within the WCS block itself.
- 10.6 This part of the Bloomsbury conservation area (Sub Area 8) is characterised by areas of large-scale, late 19th and early 20th century blocks fronting busy thoroughfares with narrow back streets that reflect the earlier 17th and 18th Century street pattern. Bounded by New Oxford Street to the North, Museum Street to the East and West Central Street to the South and West, The West Central Street block was developed under the direction of James Pennethorne in a masterplan that included the creation of New Oxford Street.
- 10.7 Holborn has been shaped by a long established pattern of main urban thoroughfares linking London's east and west. The wider area underwent redevelopment in the early 20th century with the creation of Kingsway and the slum clearance and rebuilding that came with it. Bomb damage in the Second World War resulted in more redevelopment.
- 10.8 A string of large-scale post-war developments has fundamentally altered the urban grain of the stretch between Tottenham Court Road and Holborn stations: Centre Point, St Giles Court, Selkirk House, the NCP Car Park, the Royal Mail Sorting Office and developments along the southern frontage of High Holborn. These typically have large block sizes, of a greater scale than the historic character and urban grain, for example the LSE student accommodation on south side of High Holborn directly facing site is 14 storeys.
- 10.9 Typically, these blocks had low permeability and activation at ground floor and reinforced the primacy of the motor vehicle. The resultant poor quality of public realm led to decades of under-investment and the area having a poor image. Recent work to reinstate and repair urban grain has been successful through improvements such as Central St Giles, the closure of St Giles High Street to form St Giles Square and the ongoing West End Project works. Selkirk House remains as an under-activated and impermeable block designed with the motorist in mind.

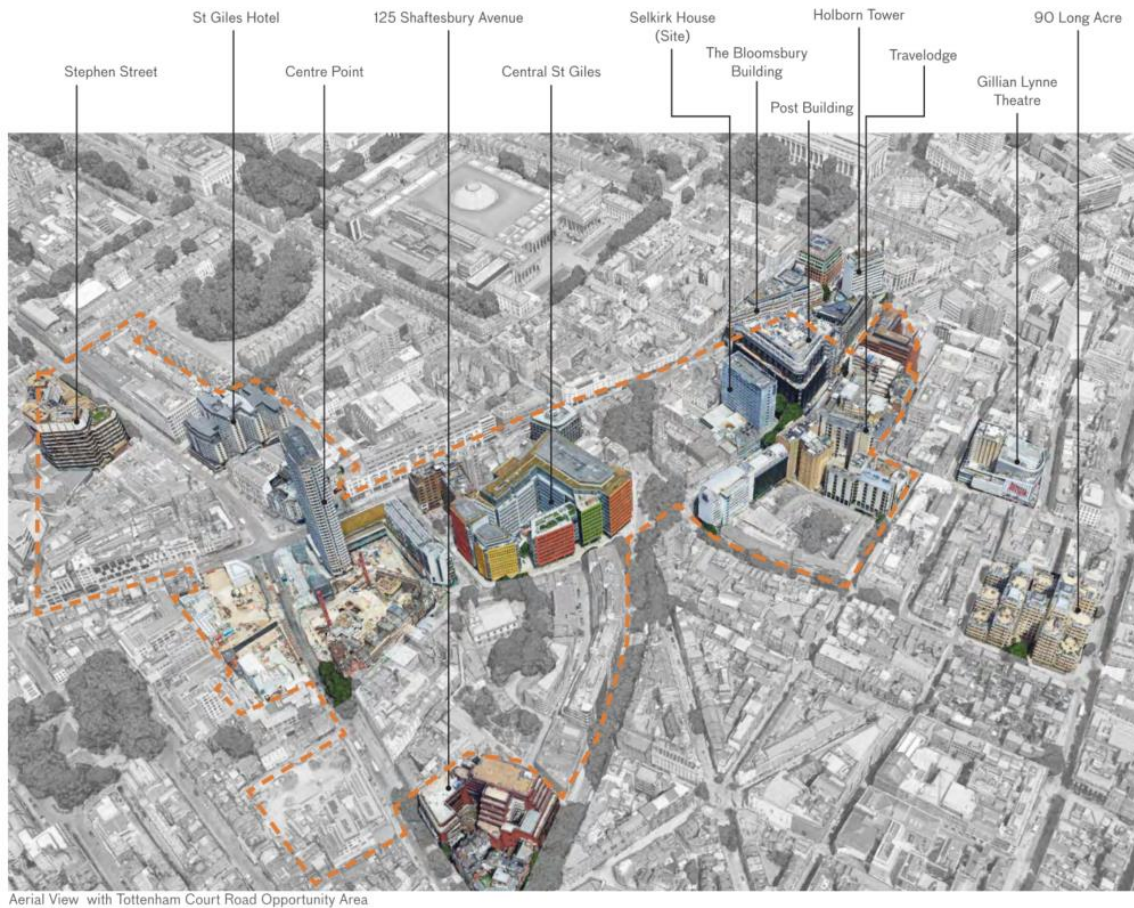


Figure 18. Aerial view of Tottenham Court Road Growth Area

### Summary of significance

- 10.10 The site lies partly within the Bloomsbury Conservation Area, the significance of which is derived from its survival as a remarkable example of Georgian town planning of international importance. This significance is described in detail within the Bloomsbury Conservation Area Appraisal document. The original street layouts, with formal landscaped squares and interrelated grids of streets create a consistent townscape of high architectural quality. The conservation area is also significant for the major institutional uses that have established and expanded over time, helping to maintain the area's distinctive and culturally rich character.
- 10.11 To the south of the site lies the Seven Dials Conservation Area, which has significance as a tightly condensed area with a range and mix of building types and uses. The character is not dominated by one particular period or style of building but their combination and the high survival of historic architecture are significant. The Seven Dials Conservation Area Appraisal document further analyses this significance.
- 10.12 Within the site are several listed buildings, 10-12 Museum Street, 35-37 New Oxford Street, all of which have recently been listed at Grade II. The significance of 10-12 Museum Street is described in the list description as the architectural interest of their original form, their 1863-5 refronting in stucco to reflect the changed context, and the degree of survival of the interiors in No. 10 in particular. 35 and 37 New Oxford Street have significance with some surviving historic interior fabric and

features but moreover hold historic and architectural interest as part of the historic Pennethorne plan.

- 10.13 The site also contains non-designated heritage assets, 16a, 16B and 18 West Central Street and 39-41 New Oxford Street, which have group and historic value. Their uniform composition the streetscape is part of their significance and described in the Bloomsbury Conservation Area Appraisal. 39-41 were rebuilt with an Art Deco facade but retain the historic scale and proportions. 16a-16b and 18 West Central Street are ancillary buildings to the New Oxford Street frontage, with historic and architectural interest due to their character and past functions which are still evident. These buildings harmonise architecturally with the neighbouring listed buildings.
- 10.14 The significance of both the designated and non-designated heritage assets located within the northern part of the application site includes: the architectural design and elevational hierarchy of the existing historic buildings; the evidential value they impart to understanding early nineteenth century town planning, in particular the laying out of New Oxford Street; the survival of an un-redeveloped nineteenth century city block and the evidential value as a small inner-city commercial complex. This is augmented by the fact that all the buildings, including the ancillary ones, survive; the contribution these buildings make to the setting of the wider streetscape and thus to the character and appearance of the conservation area; the internal planform (of No.10 Museum Street), and the surviving historic fabric and details throughout the site. This significance is reflected in the recent listing decisions on the site of 1012 Museum Street at Grade II and 35-37 New Oxford Street, also Grade II.

#### Summary

- 10.15 The application seeks to demolish and replace the existing Selkirk House with a 19 storey commercial building, demolish and replace 16a, 16b and 18 West Central Street, make alterations to the listed buildings on the site and to make improvements to the public realm, including the creation of a new street and associated buildings linking New Oxford Street and High Holborn.
- 10.16 A series of new buildings are proposed across the site, ranging in height from 6 storeys to 19 storeys. The existing listed buildings would be retained and refurbished as part of the proposals.
- 10.17 The scheme offers the opportunity to regenerate a strategically important site within the Borough, however the location is highly sensitive in regards surrounding designated heritage assets. There are a number of listed buildings both on site and within the site's vicinity and the wider area including nationally significant historic garden squares and the Grade I British Museum. The buildings within the West Central Street part of the site are within the Bloomsbury Conservation Area.
- 10.18 Due to the increased building height and bulk in the form of the scheme's proposed tower, the proposal has an adverse impact on the setting of the listed buildings within the locality of the development and that of those further afield, as well as harming the character and appearance of Bloomsbury Conservation Area, both through the loss of buildings which contribute positively to its character and appearance and through the harmful impact upon views within the conservation area.



10.19 The significance of the listed buildings within the site and the city block of which they are a fundamental part, and the qualities of the conservation area are also harmed by the demolition and replacement of the neighbouring stable buildings (16a, 16b and 18 West Central Street) which have group value and thereby augment the significance of the listed buildings.

#### Site and Setting

10.20 The site, situated on the south side of the New Oxford Street/ Bloomsbury Way/Shaftesbury Avenue junction, is located on the southern edge of Bloomsbury.

10.21 The area is densely developed, with a mix of buildings of different ages, scales and appearance in close proximity to each other. Even so, the heritage significance of the area is high, there being a large number of historic buildings with a fair number of these, together with their associated garden squares, being listed.

10.22 The site is encircled by conservation area designations; to the north and west is Bloomsbury Conservation Area, with Seven Dials Conservation Area to the south and south-east. In fact, the site sits astride the boundary of Bloomsbury Conservation Area with the northern part of the site, with its nineteenth century buildings, located within that Conservation Area (sub-area 8).

10.23 The site comprises two parts, each of distinctly different character. The northern part of the site comprises a rare survival, a nineteenth century city block, whilst the southern part, redeveloped after WWII, is occupied by the podium and slab Selkirk House (1965) and an NCP carpark.

10.24 The southern part of the site currently detracts from its immediate setting. Views South along West Central Street from New Oxford Street, including the backdrop to the listed buildings within the block, are impeded by the presence of the podium of Selkirk House. The site also suffers from a lack of active frontages, lack of permeability from West Central Street to High Holborn, a poor public realm and long-term neglect of the listed buildings.

10.25 The northern part of the site, defined by Museum Street, West Central Street and New Oxford Street, was formed by the superposition of New Oxford Street on an historic and pre-existing townscape. The significance of New Oxford Street is that it is 'by far the most important and ambitious of four new Central London streets laid out by (Sir) James Pennethorne and Thomas Chawner' (Historic England).

10.26 Within the wider site there are eight Grade II listed buildings:- 10-12 Museum Street (originally constructed c. 1820, refronted 1863-5, extensive modifications post-1990); 35 and 37 New Oxford Street (built 1847, evidential value as part of the first generation of buildings forming New Oxford Street, altered C20); 43 and 45 New Oxford Street (built 1847, evidential value as part of the first generation of buildings forming New Oxford Street); and 16 West Central Street. The buildings that are not listed are considered Non-Designated Heritage Assets as they contribute positively both to the character and appearance of the Conservation Area; but more importantly to the architectural and historic significance of the city block, which as an un-redeveloped group of nineteenth buildings has strong evidential value as a

surviving example of a small nineteenth century inner city commercial complex. These are 39-41 New Oxford Street (built 1847, rebuilt 1927); 16A, 16B & 18 West Central Street (former carriage house and stables, built in 1863 to 1865 but substantially altered or reconstructed in 1900-01, with further alterations in 1972 and the 1990s).

- 10.27 Within the city block (but outside of the site boundary) is The Old Crown, 33 New Oxford Street, which has also recently been listed Grade II.
- 10.28 There are a large number of listed buildings within the vicinity of the site, both immediate and at some short distance but within direct sightline of the site (due mainly to the height of the tower). Most significant of these are The British Museum, the Church of St. George, and Bedford Square which all sit to the north of the site, the buildings are listed Grade I, the garden square is listed Grade II\* on the Register of Historic Parks and Gardens.
- 10.29 In the wider setting of the application site are several significant buildings, including Somerset House and the Palace of Westminster. Views to these significant assets are considered in the London View Management Framework. These views are of the highest significance, contributing to the World Heritage Status of the area.

### Proposal and Assessment

#### West Central Street block

- 10.30 The proposal includes the retention and refurbishment of the listed buildings and New Oxford Street-facing buildings within the city block site but the demolition and replacement of the original stabling and ancillary buildings that front West Central Street.
- 10.31 The architecture of the nineteenth century thoroughfares created under Pennethorne's directions had attracted relatively little scholarly attention until Geoffrey Tyack's study in 1992, by when most of the original buildings on New Oxford Street had been altered or demolished. Therefore, surviving examples, particularly where they form an architectural grouping, as seen in this city block, including the mid-C19 re-frontings that reflect the architecture of the street, are of increased significance.
- 10.32 The coherent architectural treatment of the buildings and their unusual survival as a city block is an important factor in their architectural and historical significance.
- 10.33 The significance of the nineteenth century buildings within the city block is tied in with the survival of all the buildings, not just those that are listed. The former stable buildings being a rare example of small-scale urban stables for a commercial company situated in the heart of London. The former wall crane is identified as 'unusual' within Historic England's assessment as part of their certificate of immunity report for the building
- 10.34 The proposals have been amended following the listing of 10-12 Museum Street and 35 & 37 New Oxford Street. As a result, the proposed roof extensions have been omitted and height has been removed from the replacement building at 16a to 18 West Central Street. This does reduce some of the harm from the previous

iterations and helps to maintain some of the feeling of uniformity within this block. However, there is still harm identified through the demolition of 16 and 16A and the construction of the new, taller element in this location.

10.35 The applicants have undertaken considerable work in regards the proposals for the newly listed buildings, including reinstatement work, the introduction of traditional shopfronts and general refurbishment. Whilst this is welcomed and will offer some heritage benefit, there are other elements which will result in harm, such as the demolition of the historic closet wing to 10 Museum Street. The surviving historic floorplan to 12 Museum Street would be lost as part of the proposals and the creation of the podium to the rear of the terrace erodes the setting to the rear, removing the historic plots.

10.36 Overall, the proposed works to the listed buildings are considered largely acceptable and do allow for the repair and restoration of these buildings, however poor levels of maintenance and dilapidated appearance alone should not be seen as justification for replacement.

10.37 The demolition of the rear section of the city block will dilute the overall significance of this group of listed buildings given their group value as identified within the list description. The massing of the proposed replacement block of 16a to 18 West Central Street adds to the harm caused by the demolition of this element. The addition will introduce a contemporary and somewhat jarring element within this planned group of buildings, causing harm to the setting of the listed buildings and within the historic urban block.

10.38 In summary, given the loss of buildings which both contribute positively to the character and appearance of the conservation and read as part of a historic townscape group, much of which is now statutorily listed, the proposed works to the West Central Street block would cause mid-level less than substantial harm to both the Conservation Area and to the listed buildings within the site.

#### *Selkirk House*

10.39 The principal element of the proposal is the redevelopment of the podium and slab Travelodge Hotel and NCP carpark buildings.

10.40 The proposed replacement 19 storey tower would be visible throughout the wider city scape. It is noted that detailed view studies have been undertaken as part of the application in order to aid assessment of this impact.

10.41 The proposed tower is of a contemporary nature, with a stepped profile before extending vertically at the upper levels. Both the additional height and associated massing would have a significant impact on the immediate setting of the north section of the site, causing harm to the smaller scale of the historic buildings.



*Figure 19. CGI of proposed buildings*

- 10.42 The view shows how the increase in both massing and height will have an impact on the setting of the listed buildings and non-designated heritage assets immediately abutting the site. The contrast in scale is striking and will cause less than substantial harm to the uniform and consistent block.
- 10.43 However, it is relevant to note that there is a visually imposing tower of a non-contextual scale on the site which already impacts adversely on the setting of the listed buildings and the Bloomsbury Conservation Area
- 10.44 Views within the conservation areas are mostly driven by the density and height of development. This often results in views being linear, delineated by the street pattern. This is not the case for tall buildings (as here) where composition and skylines are breached.

As a result of the increase in height and massing of the proposed tower, the proposals over-occupy the skyline in some views. The proposed height of the new tower would directly impact on immediate local views within the conservation area, as well as intermediate views such as views south from the British Museum and views from Bedford Square, thus impacting negatively on the quality of setting as experienced within Bloomsbury Conservation Area. Outside the conservation area, the tower will be visible in views looking from Princes Circus towards the Shaftsbury Theatre.

10.45 In views from the British Museum, the building is visible at present. Under the proposals, the building would rise significantly above the existing low-lying historic roofscape.



Figure 20. Proposed CGI from British Museum

10.46 The proposed increase in height, as shown in this view from the steps of the British Museum, shows how the proposed tower will be easily visible in views, at odds with the surrounding scale of the historic buildings. This will cause less than substantial harm.

10.47 In the view from Bedford Square, nationally significant as a well-preserved Georgian set piece, the strong horizontal roofline which survives as the dominant element would be intruded upon by the added presence of a tower (although noting that this is not the first such feature intruding upon its setting with Centre Point being both closer and higher and thus more prominent in views from the Square).



Figure 21. Proposed CGI from Bedford Square

This view shows the proposed view from Bedford Square, one of the most sensitive locations in regards designated heritage assets. The increased height of the proposed tower will be visible in views around the square and detracts from the uniform composition of the Square. As such, the proposals will cause less than substantial harm to this significant part of the Bloomsbury Conservation Area.

- 10.48 In summary, the balanced composition of this part of Bloomsbury would be diluted, causing mid-range less than substantial harm to the significance of the Conservation Area and lower to mid-range harm to the individual listed buildings within it, for example the Grade I listed buildings of Bedford Square as well as the listed buildings within the application site itself and those immediately abutting the site

#### *Wider views*

- 10.49 The tower would be seen in longer distance views. This is an issue when the skylines of other buildings are confused by the presence of the tower. In the wider setting of the application site are several significant buildings, including Somerset House and the Palace of Westminster. Views to these significant assets are considered in the London View Management Framework (LVMF). These views are of the highest significance, contributing to the World Heritage Status of the area.
- 10.50 The introduction of the new built form to these protected views would result in less than substantial harm to the setting of Somerset House. This harm is towards the lower end of the scale given the presence of the existing building and the relatively modest increase in height in these longer views.

#### Conclusion – Impact on significance

- 10.51 The proposals comprise **less than substantial harm**, at the middle end of the scale in regards the demotion of 16a and 18 West Central Street. The proposed replacement tower block and associated increase in height also brings less than substantial harm to multiple designated heritage assets, ranging from the lower end of the scale in regards some listed buildings, to the middle end of the scale in regards the impact on the Conservation Area.
- 10.52 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the harm caused to it. As there is less than substantial harm caused to the significance of designated and non-designated heritage assets, this harm should be weighed against the public benefits of the proposals in reaching a decision.

#### Archaeology

- 10.53 The site is located within an Archaeological Priority Area, within Tier II. An Archaeological Assessment has been submitted as part of this application.
- 10.54 The Greater London Archaeological Advisory Service were consulted and have no objection subject to condition. This site is within the Source Protection Zone. If any foundation works extend 20m+ below the ground surface, there is a risk that the foundations would extend through the London Clay and affect sensitive aquifers and

therefore a Foundation Works Risk Assessment (FWRA) would be required to ensure that the risks to groundwater are minimised.

## 11 URBAN DESIGN

11.1 The urban design considerations are follows:

- Policy review
- Site appraisal and opportunity
- West Central Street block
- Selkirk House
- Assessment of proposals
- Design response
- Site layout and public realm
- Ground floor, uses and access
- Scale and massing
- Architectural approach and materiality
- Design Review Panel
- Design monitoring
- Conclusion

### Policy review

11.2 Camden Local Plan policies D1, D2 and CPG (Design) and NP policy 2 (Design and character) are relevant to the consideration of design when assessing planning applications. The CLP identifies the Tottenham Court Road Growth Area as one of the Growth Areas of Camden where most significant growth is expected to be concentrated. LP Policies D3, D4, D5, D8, and D9 are also relevant.

### Site appraisal and opportunity

11.3 There are two constituent part of the site, which differ greatly in their townscape context and existing building typologies.



Figure 22. Site plan

### West Central Street block

- 11.4 This part of the site is within the Bloomsbury Conservation Area and comprises Nos. 35-37 and 39-41 New Oxford Street; Nos. 10- 12 Museum Street; and 16a, 16b and 18 West Central Street. These buildings form part of a historic urban block and range from one to four storeys in height.
- 11.5 The significance of this block (as set out in Section 10) lies in the age and architectural features of the individual buildings, as well as its unified legibility as a signifier of London's urban expansion in the 1840s. The whole site is blighted by a lack of active frontages, lack of permeability from West Central Street to High Holborn and a poor public realm. Views South along West Central Street from New Oxford Street, including the backdrop to the listed buildings within the block, are severely impeded by the imposing presence of the podium of Selkirk House.
- 11.6 The existing buildings are currently not in a habitable condition, the facades are in a poor state of repair and while historically significant, have a detrimental appearance to the surrounding streetscape. The area has suffered anti-social behaviour, and the lack of activation at ground floor level presents a hostile pedestrian environment. This is particularly the case on West Central Street and the corner of Museum Street where the boarded up shop fronts create an unwelcoming and inactive frontage. The shop fronts along New Oxford Street are also boarded up resulting in poor engagement with the street and have a negative impact on character of the conservation area.
- ### Selkirk House
- 11.7 To the south of West Central Street is the existing Selkirk House tower, outside the Bloomsbury Conservation Area, built in the 1960s and takes the form of a 17 storey tower above a podium.
- 11.8 The ground floor podium is poorly activated and detracts significantly from the surrounding conservation areas. The lack of permeability at the building base leads to low levels of pedestrian traffic and anti-social behaviour. On the south side of West Central Street a fenced-off vehicular ramp leads down to the lowest basement level of the NCP Car Park. Very infrequently used, and terminating in a dead-end condition with poor over-looking, this area of the site has been blighted with anti-social behaviour. There is an exposed and scarred boundary wall to the rear of the historic Grape Street properties to the east.
- 11.9 The public realm also forms part of the site, which include the pavements adjacent to the site boundary and all of the West Central Street. Around Selkirk House, the pavement width on Museum Street is generously proportioned, with high quality mature trees concentrated at the south end at the junction with High Holborn.
- 11.10 There is potential to improve the contribution this site makes to the local streetscape through:
- Increasing the number of entrances at ground floor to improve safety of the streets in and around the site.
  - Introducing a finer grain of units and uses at ground floor to enliven and enhance the character of the streets around the site.



- Improving the condition of the existing listed buildings on New Oxford Street and Museum Street.
- Enhancing the architectural quality of Selkirk House and the High Holborn corridor.
- Introducing high quality public realm improvements including new routes, street planting and greenery to improve safety and permeability.

#### Assessment of proposals

11.11 There are four main elements to the proposed development on the site:

- New Oxford Street/West Central Street block: extensions and redevelopment of a number of buildings within this urban block to provide a series of new and refurbished buildings rising to 6 storeys comprising residential accommodation on upper levels and flexible town centre uses at ground floor.
- Selkirk House (One Museum Street): a single new building rising to 19 storeys, providing office accommodation on upper levels and a range of flexible town centre uses at ground level.
- High Holborn block: a single new building rising to 6 storeys, providing residential accommodation on upper levels and a flexible town centre use at ground level.
- Vine Lane block: a single new building of 4-6 storeys, providing market residential units with a flexible town centre use at ground level including the provision of a new route connecting West Central Street and High Holborn.

#### Design response

11.12 The proposed landscape-led masterplan would create an improved network of pedestrian-focused connections extending from Covent Garden to the British Museum. The proposed development incorporates a familiar rhythm and granularity that gives these areas a rich and engaging character. Through positive and active threshold, the proposals would deliver a sensitive and high quality new urban neighbourhood, connecting this piece of the city with those lively neighbourhoods to the north and south.

11.13 New housing, office and retail uses in a mix of buildings types with an architecture that draws on the historic environment ensure that this development would help to breathe new life into neglected streets and spaces in such an important part of London.

#### Site layout and public realm

11.14 The proposed site strategy introduces a legible street layout focusing on safety and activity.

11.15 The proposals reintroduce the southern end of Duke Street (now Coptic Street and West Central Street), which was built upon in the mid-19th Century, severing the route between Great Russell Street and Broad Street (now High Holborn). There are a variety of public realm improvements including a new public pedestrian route, new planting and seating on Museum Street, and pavement improvements to West Central Street.

11.16 Where the existing building presents c.220 linear metres of blank frontage to West Central Street and Museum Street around the NCP car park, the proposal creates

300 linear metres of active thresholds and entrances through a mix of residential, town centre and office uses. The increase in ground floor engagement brings with it benefits in terms of safety and security for pedestrians. In addition a new public route through the site will increase its permeability and pedestrian footfall connecting New Oxford Street to High Holborn meeting policy expectations (Policy G1, Local Plan 2017). Greater activation of these routes also addresses anti-social behaviour issues and relates more closely to the character of Covent Garden and Bloomsbury.



Figure 23 - Existing and proposed

- 11.17 The site layout is also more generous to the public realm than the existing building by introducing a new street and small public courtyard. Overall, 1,083sqm of the space would be provided as public realm across the site with the proposal creating 350sqm of new public realm through the creation of a new public street and courtyard. This would form a welcome contribution in light of the shortfall of public open space in the area, and provide a valuable new route through the site in line with the Council's wider aspirations for introducing safer walking routes in the south of the borough.
- 11.18 The scheme cannot reasonably deliver more public open space without compromising the viability (as confirmed by BPS' comments) and deliverability of the development. The public realm proposed would be of sterling quality and is welcomed. The pedestrian, cyclist and environmental contribution (see Transport section) would ensure that the public realm around the site would be upgraded to be of an excellent quality to match the public realm on-site.

Ground floor, uses and access

- 11.19 The proposed development is primarily office and residential with a mix of commercial uses at ground level. The land uses are distributed across the site in order to make the ground floor engaging and characterful. Overall, the scheme achieves a significantly higher degree of active frontage in proportion to its footprint

when compared with the existing site condition, which aligns with key design policies and contributes positively to the vibrancy and economic vitality of the area.

- 11.20 Residential entrances are located along West Central Street, New Oxford Street and Vine Lane. Museum Street will be the main entrance for the new office accommodation. Commercial units are located at building corners to provide a positive contribution to the public realm.
- 11.21 The main servicing provision is concentrated on High Holborn, and is confined to a vehicular lift to the basement to ensure the ground floor façade is not dominated by service bays. Its location on High Holborn ensures vehicular servicing movements are kept away from the new public realm and residential accommodation on West Central Street and Grape Street.
- 11.22 The Vine Lane building presents a continuous elevation along West Central Street and the new route, with windows and entrances directly addressing the street to create a strong relationship with the new pedestrian route and to improve safety. The main entrance is a covered open space that is clearly defined and aligned with the junction of West Central Street and Vine Lane.

#### Scale and massing

- 11.23 The massing strategy follows the existing pattern of development across the two constituent parts of the site: maintaining a midrise scale of the existing urban block on West Central Street, and concentrating height within the Tottenham Court Road Growth Area, where it already exists on Selkirk House.

#### West Central Street

- 11.24 The scheme proposes a new part five/part six storey building to replace 16/16A West Central Street. Whilst replacing buildings that are original to the 19<sup>th</sup> century street block and of a lesser scale, the proposed massing is nevertheless consistent with the existing building heights and ties the proposals into the existing fabric to create a cohesive and coherent urban block.

#### Vine Lane and High Holborn

- 11.25 The proposed Vine Lane building is part four/part six storeys. The High Holborn block is six storeys. The massing of these buildings relates to the listed Grape Street buildings and acts to repair the urban block it adjoins, defining a distinct urban island. Infilling the current gap and service road at the rear of Grape Street is considered a significant benefit of the scheme creating positive enclosure to the western side of West Central Street.
- 11.26 To the north and north-west, there are a series of existing windows in neighbouring properties that overlook the site. To address this, the proposed massing will step to create non-accessible planted roofs as a visual amenity that improves the existing outlook of these properties. Along the north boundary wall, the building massing is further reduced in height, to create a single storey setback between the new and existing building.
- 11.27 On High Holborn a taller element is used to announce the building at its corner and to reveal the new pedestrian route, which is a common feature of the immediate townscape context.

### One Museum Street (Selkirk House)

- 11.28 The proposed building is 19 storeys, and is taller than the existing 17 storey tower by 20m. A building of this scale and massing ties into a pattern of large footprint taller commercial buildings established within the Tottenham Court Road Growth Area and rises in dialogue with larger buildings to the immediate east and south.
- 11.29 The building form is sculpted to respond to the three different streets that it addresses.
- 11.30 On Vine Lane the building steps back above five storeys to set a familiar street scale for Vine Lane mirroring the shoulder height of the Vine Lane and High Holborn blocks. This lowest step denotes the entrance to the new north-south Vine Lane pedestrian route and establishes a more human scale in the streetscape.
- 11.31 To the north, the building steps back at eight storeys on West Central Street, and then steps back again at 11 storeys on the Vine Lane elevation. These steps provide relief in the streets around the building and present the top of the building as a more slender profile against the sky.
- 11.32 Horizontal bands are introduced to the main body of the building to express the stepped massing and to further break down the proportions of the façade. This creates a sense of scale on Museum Street that relates to the Post Building opposite and the buildings along the southern side of the High Holborn corridor.
- 11.33 The proposed tower is considered a ‘tall building’ given the predominant heights in the vicinity. The massing, form and proportions of the proposal aligns with key tall building policies (Policy D9 London Plan 2021 and Policy D1 Camden Local Plan 2017).

### Architectural approach and materiality

- 11.34 The proposals present a contemporary response to the architectural principles found in the Victorian, Arts and Crafts and Art Deco group of buildings of which it forms a part. Architecturally these buildings have been designed to relate to each other to form a considered piece of townscape.
- 11.35 Given that the design quality of each building relies on the quality of materials and detailing, these are conditioned to ensure buildings of the highest quality with durable finishes that weather gracefully.

### One Museum Street

- 11.36 Whilst taller than its immediate context, the proposed building replaces an existing tower of limited architectural quality with a building of greater architectural merit that will improve townscape views. The design has drawn on the architecture of Fitzroy Doll and applied some of the ordering principles seen in Grape Street in order to respond to the architectural language found in surrounding buildings. Rounded corners have been used to establish an architectural language that draws heavily from the character of the local conservation area. The bronze coloured metal responds to the tonality of the local context in the conservation area and complements its neighbours whilst establishing a strong individual character.

11.37 At the building's base the ground floor treatment alters depending on orientation and internal use: to the east an open colonnade treatment engages with the Museum Street public realm, whereas on the western facade additional articulation signifies an active retail frontage. This provides a sense of generosity and connectivity to the street and responds to the human scale, in line with Tall Building policies (D9, London Plan).

#### West Central Street

11.38 The character of the West Central Street buildings comes from the varied townscape, architectural style, heritage significance and materiality of the individual freeholds which make up the block. Consideration has been given to ensure that the architectural proposal for the scheme reinforces this character while enhancing the setting of this urban block within the Bloomsbury Conservation Area.

11.39 The proposed design includes a vertical grid to create a consistent street rhythm, offset by horizontal datums to unify streetscape and consolidate ground floor active frontages. There is an interpretation of the projecting bay language to create oblique view and reduce direct overlooking from neighbours. Red brick is proposed to create a contrast to the adjacent buildings as informed by the setting of other mansion blocks in the conservation area. These materials and details are all considered to respond appropriately to the character of the area in line with policies D1 and D2 (Camden Local Plan, 2017).

#### Vine Lane and High Holborn

11.40 The two proposed blocks are to be read as a pair, sharing a common language and materiality, further reinforcing the overall cohesion of this newly-restored urban block.

11.41 To the west of the block is Grape Street which is constituted of Grade II listed mansion blocks featuring ornate terracotta banding and projecting oriel bays with enhanced corners. The composition of the facades takes cues from these adjacent buildings in order to form a contextual design that is rooted in its place and cultural history. Horizontal bands and cornices establish a strong vertical hierarchy and ordering as can be seen on the existing Grape Street buildings and the Cuban Embassy. Together with a mix of primary piers and secondary precast concrete mullions, this helps reinforce the building's link to its surroundings and to create interest across the relatively long extent of the primary eastern facade.

11.42 At ground floor on the junction of West Central Street and Vine Lane, the residential entrance is clearly expressed as a generous opening. Large openings here create an active experience at street level and express the contrast in use with residential floors above.

11.43 A terracotta toned brick is proposed to the inset balconies with bespoke balustrades to the residential floors, both of which help to establish a clear facade hierarchy and mediate between the ground floor condition. Tonally, the Vine Lane and High Holborn buildings complement the buildings along Grape Street. The result is a contemporary interpretation of the architecture and detailing local to the context.

11.44 The detailing is considered to add a richness to the façade design and are an important element of the proposals. The overall material palette respond contextually to the established palette in the area and is welcomed in this proposal.

#### Design Review Panel (DRP)

11.45 The proposals were seen by the DRP in November 2019 and October 2020. The panel were supportive of the design strategy, including the opening up of new routes and retention of existing historic buildings. A number of changes were made to the scheme to address some of the comments and issues raised by the panel. Subsequent to the DRP reviews, a number of the WCSt buildings were listed by Historic England. As a result, the scheme was amended to reduce and remove some of the extensions. Most notably, the proposed extension to 10-12 Museum Street was removed. The scale and materiality of this had been questioned by the DRP with some concerns raised about its relationship with the neighbouring listed buildings on Museum Street. These concerns have been negated by the removal of this element in the revised scheme.

11.46 The panel took the view that the tower had the potential to be a positive landmark and suggested further refinement of the design, particularly in relation to the articulation of the top of the building. Since the DRP meeting, studies of the hierarchical proportions of the local context were taken by the applicant team. This has resulted in a crown that provides the building with a lantern-like top that gives the building a prominent status in the wider skyline and accords with Policy D9 of the London Plan. There was also a reduction in height of tower by two storeys to address issues raised in the TVIA. As well reducing its visibility in LVMF views, this also mitigates the impacts in views towards the Shaftesbury Theatre.

11.47 The panel questioned the scale and form of the proposed extension to 10-12 Museum Street. After the listing of this building, the extension has been removed from the proposals.

11.48 There were concerns that the residential courtyard within the West Central Street block would be a dark space. Since the review there has been a reduction in height and bulk on the West Central Street buildings, and the previously proposed extension on 10-12 Museum Street has been removed. The reduction in height and bulk of these buildings on the south and east of the courtyard which would improve views towards the sky and the sense of enclosure within the space.

11.49 The panel had questions about the environmental strategy of the tower, and how the different facades would be treated to address overheating. The design of each elevation incorporates design principles that align with the LETI (London Energy Transformation Initiative) Climate Emergency Design Guide. This includes passive strategies to reduce energy expenditure through façade depth and solar shading to mitigate solar gain and openable windows to reduce cooling demand in summer.

11.50 It was considered that the changes made sufficiently addressed the comments made by the panel and therefore needed no further review.

#### Design monitoring

11.51 To ensure that the approved standard of design is maintained through to the build, an obligation would be included in the Section 106 agreement to ensure design

monitoring, with reasonable endeavours to retain the architect. Conditions are also attached on materials

### Conclusion

- 11.52 The proposals would significantly improve the experience of the urban block from the street and enhance the public realm around the site. The design creates an open, publicly accessible, mixed use ground plane with active ground floor frontages, newly shaped public spaces and a new route connecting West Central Street and High Holborn.
- 11.53 This increased granularity of uses would bring the positive qualities of Covent Garden to the south and Bloomsbury to the north through the site area and a continuity of street life and character and begins to bridge the experiential severance created by large footprint buildings with fewer entrances, single use blocks and long blank frontages.
- 11.54 The proposed buildings on West Central Street and Vine Lane tie the proposals into its context repairing existing urban blocks and creating a cohesive and coherent townscape that makes a positive contribution to the surrounding streets.
- 11.55 Officers consider there would be some harm to designated heritage assets (see Heritage section above). However, the scheme features high-quality architecture demonstrated through its composition and detailing that has been well considered. Officers consider that the quality of the proposed architecture limits the level of harm.

## **12 NATURE CONSERVATION, LANDSCAPE AND BIODIVERSITY**

12.1 The nature conservation, landscape and biodiversity considerations are follows:

- Policy review
- Introduction
- Trees
- Landscaping
- Biodiversity
- Conclusion

### Policy review

12.2 London Plan policy D8 (Public realm) states that new development proposals should seek to create new public realm and that the public realm should be of a high quality. The Camden Local Plan policies A2 (Open space) and A3 (Biodiversity) and Camden CPG Biodiversity seek to protect existing trees, secure additional trees and vegetation and to protect and promote biodiversity. The supporting text of policy G1 (Delivery and location of growth) seeks an excellent public realm within the Tottenham Court Road growth area, with an improved network of safe and attractive spaces for pedestrians and cyclists and remedying the lack of open space in the area through on-site provision or financial contributions. The draft Holborn Vision and Urban Strategy also seeks excellent public realm, prioritising the pedestrian and the cyclist.

12.3 A number of public realm improvements have been carried out or are planned in the wider area as part of the West End Project.

Introduction

12.4 An Ecological Assessment, landscaping plans and an Arboricultural Impact Assessment were submitted as part of this application. A Nature Conservation Officer and a Tree and Landscape Officer have reviewed these documents.

12.5 The site currently has a very poor natural ecology and low landscape quality, with much hardstanding. The area in general suffers from an ecological deficiency, although there are a number of trees on or adjacent to the site

Trees

12.6 Ten trees would be felled under the proposals, though the only significant tree to be felled is a Category B early-mature London Plane and the rest of the trees are low quality Category C, two of which are recently-planted. Five retained trees would require pruning.

<b>Tree grade</b>	<b>BS5837:2012 definition</b>	<b>No. of trees</b>
A	High quality, est. remaining life span of >40 yrs	0
B	Moderate quality, est. remaining life span of >20 yrs	1
C	Low quality, est. remaining life span of >10 yrs or below 150mm diameter	9
U	Poor quality, est. remaining life span of <10 yrs	0
	<b>TOTAL</b>	<b>10</b>

*Figure 24. Trees to be removed*



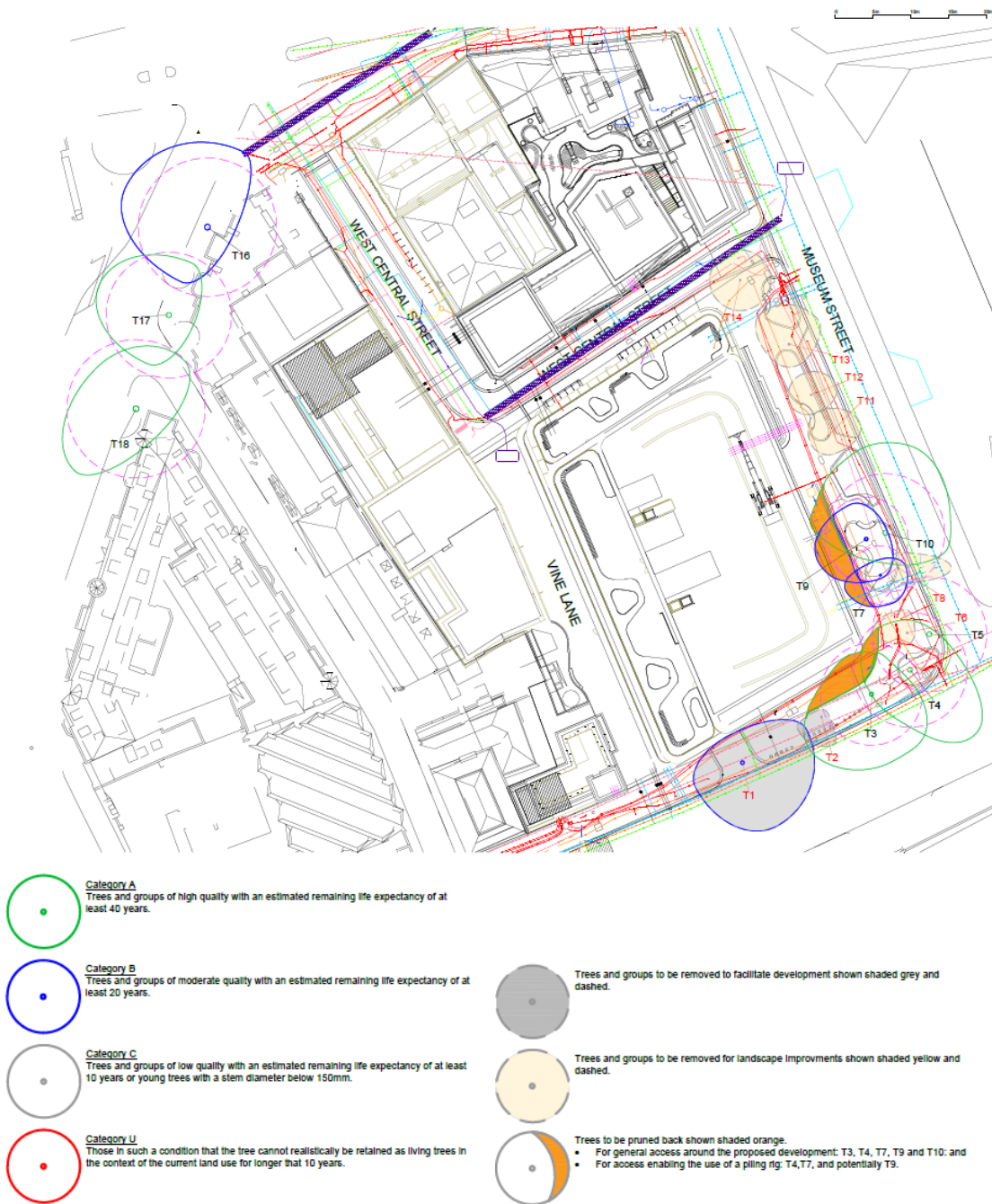


Figure 25 – Plan showing trees on the site for removal

12.7 One of the Council’s Tree Officers has assessed the proposals.

12.8 Ten trees are proposed. Nine of these are proposed to be London Planes and one a Honey Locust. However, the Council’s Tree Planting Strategy seeks to diversify tree species for biodiversity reasons, particularly in the south where London Plane is over-dominant. A condition is attached requesting a Tree Protection and Replacement Strategy.

12.9 Four of the trees proposed to be removed are on the public highway and six are within the site boundary. Regarding the proposed ten new trees, eight of these would be within the site boundary and two on the public highway. A condition is

attached regarding the trees proposed within the site boundary and a section 106 obligation is attached regarding the proposed trees on the public highway.

#### Landscaping

- 12.10 The site is currently predominantly hardstanding, though there are some mature trees as set out above.
- 12.11 2,197sqm of open space would be provided as part of the development. 1,083sqm of this would be public realm. The rest of the open space would be provided as communal office terraces and communal open space in the WCS courtyard and within the Vine Lane block (courtyard and level 4). Roof gardens and terraces are used to promote social cohesion within the commercial buildings, and to include planting. In summary, the breakdown of open space across the site is as follows:
- 1,083sqm provided as public realm.
  - 509sqm provided as private commercial terraces within Museum Street building.
  - 151sqm provided as play space within the West Central Street courtyard, which also provides communal open for residents of those buildings.
  - 195sqm of communal open space within the Vine Lane block - 74sqm within the courtyard and 121sqm at level 4.
  - 129sqm of private amenity space for West Central Street residents.
  - 130sqm of private amenity space for Vine Lane residents.
- 12.12 A new north-south pedestrian route ('Vine Lane') would be knocked through from the corner of West Central Street to High Holborn. Planting and seating would be provided on this route, including within a pocket green space. It is envisaged that this route would remain open 24 hours a day, though the potential for gates has been designed into the scheme, given the concerns raised by some local residents. This would be ensured via a section 106 obligation. The provision of this new route and open space is strongly welcomed.

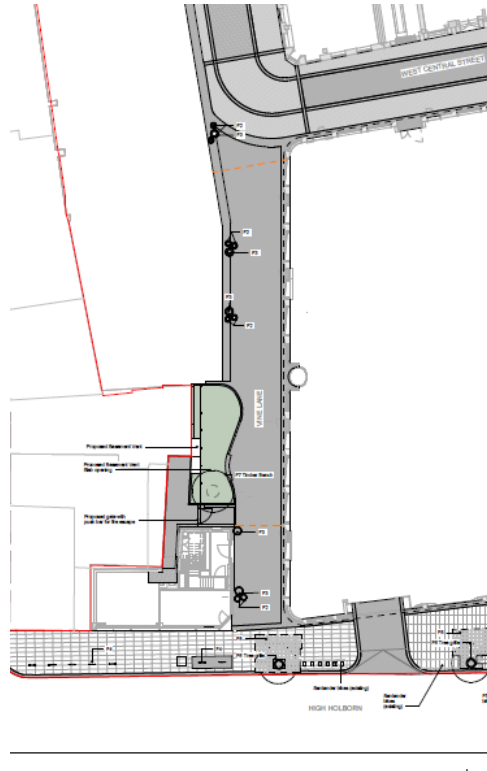


Figure 26. Proposed new route

12.13 The building line along Museum Street would be set slightly further back to allow more generous public realm. Planting and seating would be incorporated into the public realm here.

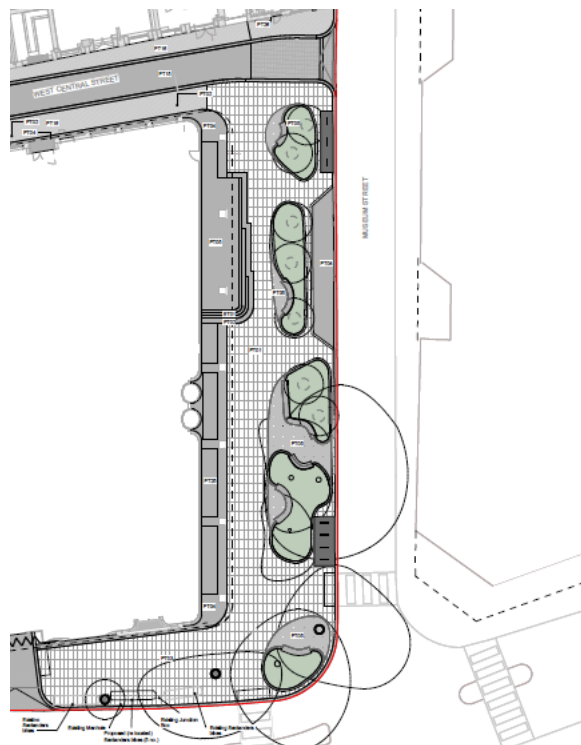


Figure 27. Proposed public realm on Museum Street

- 12.14 West Central Street would be converted to a pedestrian and cyclist priority street. 186sqm of playspace would be located within the courtyard of the West Central Street block.
- 12.15 The high-quality public space and landscaping is welcomed. A condition is attached requiring full details of landscaping. A Public Realm Management Plan would be secured via section 106 to ensure the maintenance of this area. The proposed changes to the public highway would be secured via a section 106 obligation on pedestrian, cyclist and environmental improvements.

#### Biodiversity

- 12.16 London Plan policy G5 (Urban greening) set a target of 0.3 for the Urban Greening Factor (UGF). The UGF is a land-use planning tool to help determine the amount of greening required in new developments. At present, the site has a low UGF of just 0.16. Under the proposals, the UGF of the site would be increased to 0.3 in line with policy G5.
- 12.17 The proposed UGF levels are welcomed. The introduction of planting and green roofs on the upper levels of the building would improve biodiversity in the area.
- 12.18 The Biodiversity Net Gain calculations show an uplift of 70%. This is a very high figure, although this reflects the poor biodiversity on site at present. However, there would still be a substantial increase which is welcomed.
- 12.19 The living roofs are welcomed. A condition is attached for further details on these.
- 12.20 With regards planting, a condition is attached requiring details of planting, to ensure predominantly native species and species identified within the Royal Horticultural Society's plants for pollinators lists, having regard to sustainability.
- 12.21 Conditions are also attached regarding details of bird and bat boxes and lighting.

#### Conclusion

- 12.22 Given the above, the proposals are considered acceptable in nature conservation, landscape and biodiversity terms. The proposals would significantly enhance the natural value of the site.

### **13 AMENITY OF NEIGHBOURING PROPERTIES**

- 13.1 The considerations on the impact on the amenity of the occupiers of neighbouring properties are as follows:
- Policy review
  - Introduction
  - Loss of light
  - Loss of privacy
  - Noise

#### Policy review

- 13.2 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise.

Impacts from construction works are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of residents should be protected and development which causes an unacceptable level of harm to amenity should be refused.

13.3 LP policy D9 about tall buildings says that daylight and sunlight conditions in the neighbourhood must be carefully considered.

#### Introduction

13.4 The closest residential properties are located to the north-west of the site on West Central Street, on New Oxford Street to the north, on Grape Street to the west and above the White Hart Pub on Drury Lane to the south-east. There is also student accommodation to the south on High Holborn.

13.5 The considerations with regards to the amenity of the proposed housing are as follows:

- Policy review
- Introduction
- Daylight, sunlight and aspect
- Categorising impacts and alternative targets
- Methodology
- Assessment
- Loss of privacy
- Noise
- Conclusion

#### Daylight, sunlight and aspect

13.6 A Daylight and Sunlight and Overshadowing Assessment was submitted as part of the application.

13.7 The technical information in the report, as well as the methodology, has been reviewed for the council by an independent third-party assessor – Delva Patman Redler Chartered Surveyors (DPR).

13.8 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.

13.9 Paragraph 125 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

#### Methodology

13.10 The BRE assessment methodology has been used for assessing the effects on existing surrounding properties, including daylight (the two-part assessment of VSC

and NSL) and sunlight (the two-part assessment of APSH annually and in winter) to buildings and sun-on-ground to amenity spaces.

- 13.11 Detailed tabulated results have been provided showing the daylight and sunlight levels in the existing and proposed conditions, the absolute loss (existing value minus proposed) and relative loss (absolute loss divided by existing value, expressed as a percentage).
- 13.12 The BRE standard numerical guidelines have been applied to establish the number of impacts on each property (or group of properties) that are within the guidelines and the number that are outside the guidelines.
- 13.13 To assist understanding of the magnitude of the impacts the terms ‘negligible’, ‘low’, medium’ and ‘high’ for the magnitude of impact are used, based on the categorisation set out in Table 1 below.

Impact satisfies the BRE guidelines	Impact does not satisfy the BRE guidelines		
	20.1% to 29.9% loss	30% to 39.9% loss	more than 40% loss
Negligible impact	Low magnitude impact	Medium magnitude impact	High magnitude impact

Figure 28 – Categorisation of magnitudes of effect

- 13.14 Appendix H of the BRE guide provides guidance for use in EIAs to determine the significance of effect (‘negligible’, ‘minor’, ‘moderate’, and ‘major’ adverse). Whilst the Application is not EIA development, the guidelines are nonetheless helpful in understanding the significance of the effects of the development. Significance takes into account the number of impacts that are outside the BRE guidelines, the magnitude of the impacts and the margin by which they are outside, the sensitivity of the receptors (in terms of the strength of their requirement for daylight and sunlight), whether the receptors have other sources of light and whether there are particular reasons why an alternative, less stringent, guideline should be applied.
- 13.15 The methodology and criteria used for the assessment are based on the approach set out by BRE guidance. The report makes use of several metrics in its assessment of surrounding buildings which are described in the BRE guidance:
  - Vertical Sky Component (VSC) – This relates to daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
  - *The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (i.e. a reduction of more than 20%) its former value.*
  - No Sky Line (NSL), also known as Daylight Distribution (DD) – This relates to daylight penetration into a room. The area at desk level (“a working plane”) inside a room that will have a direct view of the sky.
  - *The NSL figure can be reduced by up to 20% before the daylight loss is noticeable (i.e. retain 0.8 times its existing value).*
  - Annual Probable Sunlight Hour (APSH) - A measure of the amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground

across the whole year and also as a measure over the winter period. The main focus is on living rooms.

- The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. Impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.
- The overshadowing of open spaces is assessed by considering any changes to surrounding outdoor amenity spaces. A Sun Hours on Ground assessment has been undertaken which uses the BRE methodology.
- The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on the 21st March; if below that the area which can receive some sun on the 21st March should not be reduced to less than 0.8 times its former value.

Categorising impacts and alternative targets

13.16 The assessment has set significance criteria which is the approach recommended by BRE guidance. The approach is endorsed by DPR, as are the criteria used which are in the table below.

BRE compliant	0.1 to 30% reduction	30.1% to 40% reduction	More than 40% reduction
Negligible	Minor Negative	Moderate Negative	Major Negative

Figure 29 - Impact criteria

13.17 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London or Growth Areas. As a result, it recommends setting alternative targets which take account of relevant local context.

13.18 The London Plan Housing SPG states:  
*The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.*

13.19 Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative negative impact on the VSC, and on the area receiving direct skylight. Where there are balconies which can cause obstruction, the BRE guidelines suggest modelling the impacts with and without the balconies. This allows you to test whether the presence of the balcony or overhanging walkway, rather than the size of the new obstruction (the proposed development), is the main factor in the relative loss of light.

### Assessment

13.20 The map below in Figure 30 shows the location of the surrounding properties tested. The neighbouring residential properties have all been assessed in terms of daylight for both VSC (Vertical Sky Component) and NSL (No Sky Line) and with regards sunlight for APSH (Annual Probable Sunlight Hours).

### Daylight

13.21 The following properties have residential accommodation and were tested for daylight/sunlight impacts from the development:

- 178 High Holborn – (student accommodation)
- King Edward Mansions
- Sovereign House
- 190-191 Drury Lane (The White Hart Pub)
- Shaftesbury Court
- 7 Grape Street
- 14 West Central Street
- 40 New Oxford Street
- 42 New Oxford Street
- 43A New Oxford Street

13.22 The following properties/groups of properties would be compliant with BRE guidelines and only experience a negligible effect in daylight terms based on the maximum parameters, and are therefore not discussed further:

- Sovereign House (Grape Street)
- Shaftesbury Court
- 17 Grape Street
- 40 New Oxford Street
- 42 New Oxford Street.

13.23 The remaining five buildings are discussed below in turn.

- King Edward Mansions (Grape Street)
- 190-191 Drury Lane (The White Hart Pub)
- 14 West Central Street (20 on the map below)
- 43A New Oxford Street (25 on the map below)
- 178 High Holborn – (student accommodation) (no. 10 on the map below)



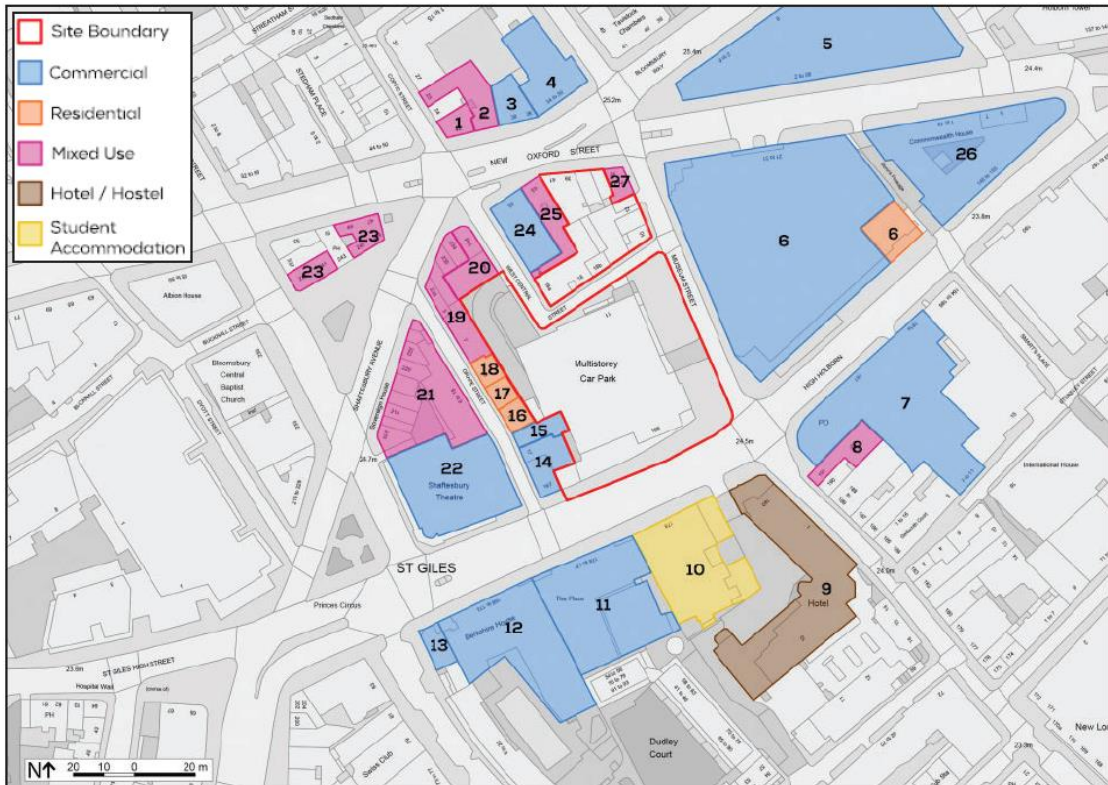


Figure 30. Location of surrounding properties tested

### King Edward Mansions

- 13.24 These flats are located on the western side of Grape Street, to the west of the site. 96 windows were tested here – 84 of which fully complied with BRE guidance. The remaining twelve windows would experience a low magnitude impact of between 20.1%-29.9%.
- 13.25 With regards NSL, 45 of the 47 rooms would pass the guidance, with the remaining 2 rooms experiencing a low magnitude impact of between 20.1%-29.9%.
- 13.26 Given the above, these properties would experience only minor impacts and would not suffer unacceptable harm.



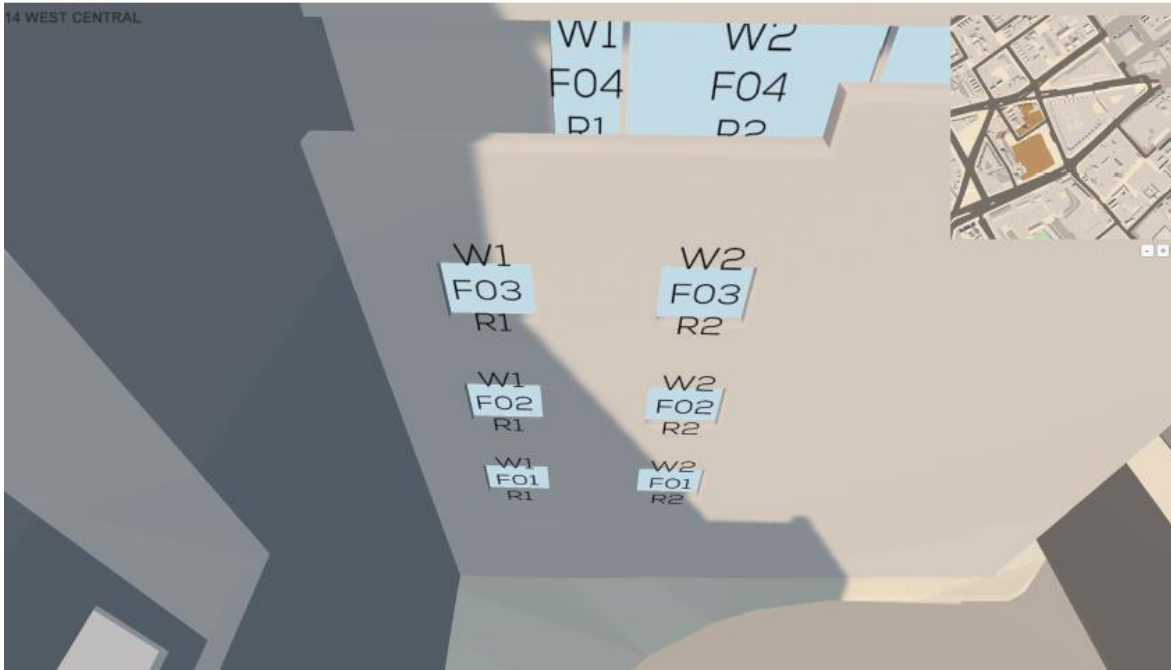
### 190-191 Drury Lane (The White Hart Pub)

- 13.27 These flats are located to the south-east of the application site. Ten windows were tested here, seven of which fully complied with BRE guidelines. Of the three remaining windows, two would experience a low magnitude impact of between 20.1%-29.9% and the other window would experience a medium magnitude impact of between 30%-39.9%.
- 13.28 With regards NSL, one room would meet the guidelines and three would not. Two of these would experience a low magnitude impact of between 20.1%-29.9% and the other room would experience a medium magnitude impact of between 30%-39.9%. Given that no rooms would experience a major adverse impact and only one would experience a medium magnitude impact, the impact is considered acceptable in this Central London location.
- 13.29 All windows would comply with regards sunlight.



### 14 West Central Street

- 13.30 These flats are located to the north/north-west of the site, on the western side of the top end of West Central Street. 20 windows were tested here. Five windows would not fully comply with the guidelines; two would experience a low magnitude impact of between 20.1%-29.9% and the other three windows would experience a high magnitude impact of over 40%. These three windows would experience the following losses:
- 41.4% flat 01, room 01 (living/kitchen/dining room), window 1 (W1 F01 R1)
  - 58% flat 01, room 02 (bedroom), window 2 (W2 F01 R2)
  - 46.3 % flat 02, room 02 (bedroom), window 2 (W2 F02 R2)
- 13.31 These three windows all have current VSC values below 20% - 12.8%, 15.7% and 17.7% respectively. Any loss is therefore large in percentage terms. These windows benefit from decent levels of light because they face an undeveloped piece of land and they are bad neighbour windows given their location on the flank elevation.



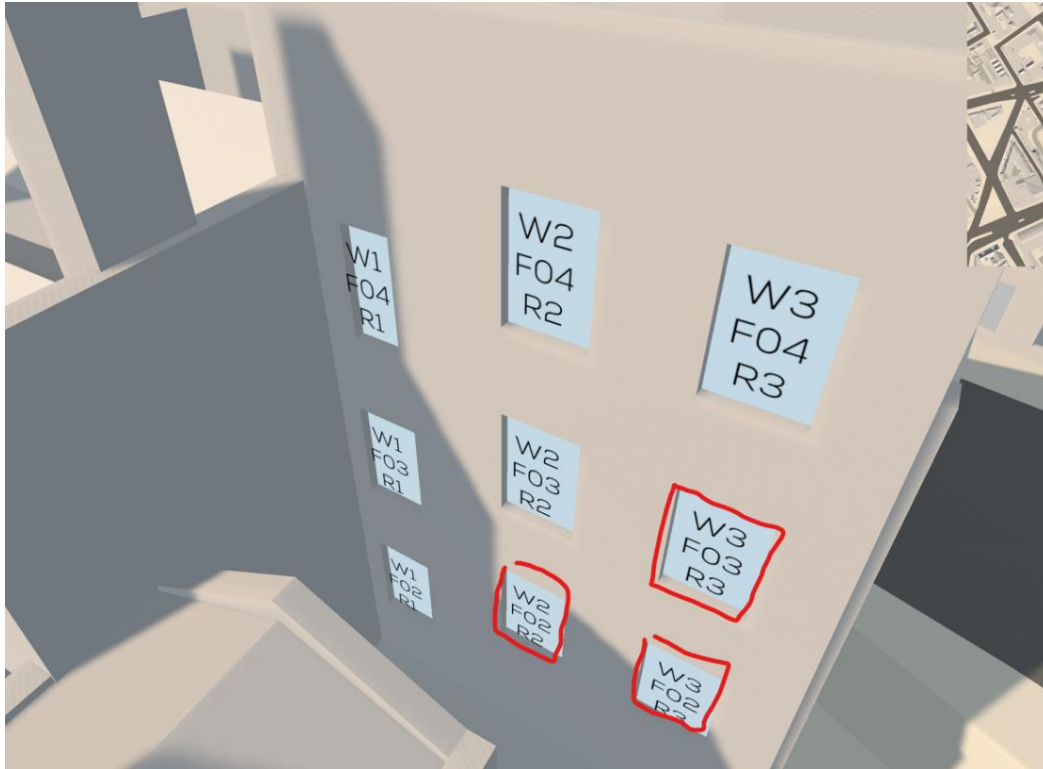
- 13.32 With regards NSL, four of the nine rooms tested would pass the guidance. With regards the remaining five rooms (three bedrooms and two living/kitchen/dining rooms), one would experience a low magnitude impact of between 20.1%-29.9%, two would experience a medium magnitude impact of between 30%-39.9% and two would experience a high magnitude impact over 40%. All five rooms would experience a high magnitude impact of over 40% in winter sun terms.
- 13.33 Of the three windows that would experience the highest VSC losses, only one is a habitable room (living/kitchen/dining) and the other two are bedrooms. These windows are located on the gable, facing directly on to the applications site and therefore receive their light across the application site and prejudicing development on this site. They neighbour the part of the site that it is not built upon as it is the vehicular access to the multi-storey car park. The windows in question are located on the boundary wall, looking directly on to an undeveloped site in Central London. For this part of the site to be developed, there would be an inevitable impact on these side-facing windows. The proposals have sought to develop the site adequately, whilst minimising amenity impact. Given the above, the impact is considered acceptable.



43A New Oxford Street

- 13.34 These flats are located on the northern side of the WCS block. There are nine windows on the rear elevation, facing the site. Three of these serve non habitable circulation spaces. As such, these were not considered relevant for assessment in line with the BRE guidelines. Six windows were therefore tested here and three would not fully comply with the BRE guidelines (see image below), however, these would only experience a low magnitude impact of between 20.1%-29.9%.
- 13.35 With regards NSL, only one of the six would fully comply with the guidelines, four would experience a low magnitude impact of between 20.1%-29.9% and one window would experience a medium magnitude impact on 30%-39.9%. The use of these rooms is unknown. Given that no windows would experience a major adverse impact and that only one would experience a moderate impact, the amenity impact is considered acceptable here.





178 High Holborn (student accommodation)

- 13.36 This student accommodation is located directly opposite the site to the south, across High Holborn. Student accommodation is generally afforded less protection, given the transient nature of the accommodation, but it is still a form of residential accommodation that must be protected accordingly.
- 13.37 124 windows were assessed on this block. Only 24 would fully comply with the guidelines. 36 would experience a low magnitude impact of between 20.1%-29.9%, 51 would experience a medium magnitude impact of between 30%-39.9% and 13 would experience a high magnitude impact over 40%.
- 13.38 With regards NSL, 42 rooms would fully comply with the guidelines. With regards the remaining 35 rooms, 24 would experience a low magnitude impact of between 20.1%-29.9%, six would experience a medium magnitude impact of between 30%-39.9% and five would experience a high magnitude impact over 40%.
- 13.39 Due to their north-facing orientation, no windows qualified for sunlight assessment.
- 13.40 DPR considered that this property would experience a minor-moderate adverse effect in daylight and negligible effect in sunlight. Given the transient nature of student accommodation and the scale of the effect, the impacts are considered acceptable here.
- 13.41 The impact on general office premises is accorded little weight. The impact on the Post Building roof garden is not considered a material planning issue.



### Loss of privacy

- 13.42 The existing residential properties in the West Central Street block have their main outlook on to New Oxford Street or Museum Street. There are some rear facing windows but these would not be materially affected in terms of overlooking.
- 13.43 The proposed Vine Lane building echoes the scale of buildings immediately around the block, specifically those of the neighbouring listed Grape Street buildings. One of the third floor windows in the proposed Vine Lane building has been removed, given overlooking concerns. The room it would serve would have been triple aspect, so the property would still benefit from dual aspect and decent levels of light. The other window that is not currently obscured by current boundary treatment would be set behind the deck access, which would restrict views across. This window would also serve a bedroom where there would be less overlooking impact than a living/dining room. The deck access would be an access point only and whilst there would be overlooking from this, it would only be momentary when people were accessing the proposed dwellings. Furthermore, it should be noted that the rear windows serving the existing Grape Street properties are only about 2.5m from the rear boundary. The bulk of the separation distance would be on the application site. To provide 15m separation distance, it would not be possible to develop this part of the site fully, in accordance with the NPPF.
- 13.44 There is an existing large boundary wall between the site and the rear of properties on Grape Street which means there would be no direct overlooking from the rear of flats up to second floor level in the proposed Vine Lane building (see figure 31 below). At third floor level there would be a distance of just 9.2m from the rear windows of Grape Street and the proposed Vine Lane building.



Figure 31. Relationship of proposed Vine Lane Building and the rear of Grape Street

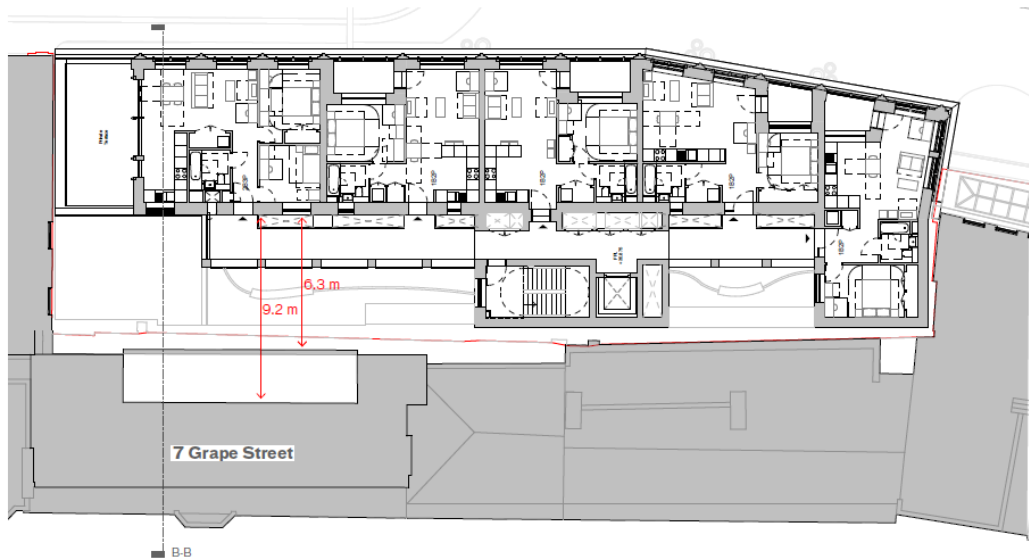


Figure 32. Relationship of proposed Vine Lane Building and the rear of Grape Street

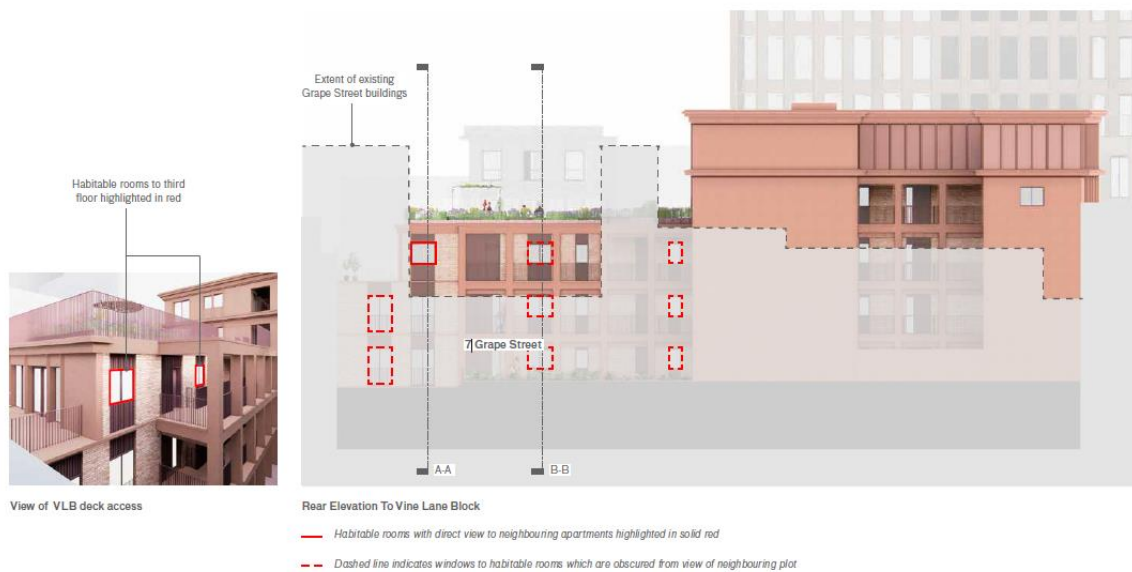


Figure 33. Rear elevation of Vine Lane block

13.45 The windows on the southern elevation of 14 West Central Street (see Figure 33 above) would be located just 3.5m away from residential windows in the proposed development at second floor level at their closest point, with distances between other windows of 6m, 6.7m and 7.8m. However, these windows are at right angles to each other rather than directly facing each other. Given the oblique angles involved, there would not be direct overlooking and the amenity impact is acceptable here.



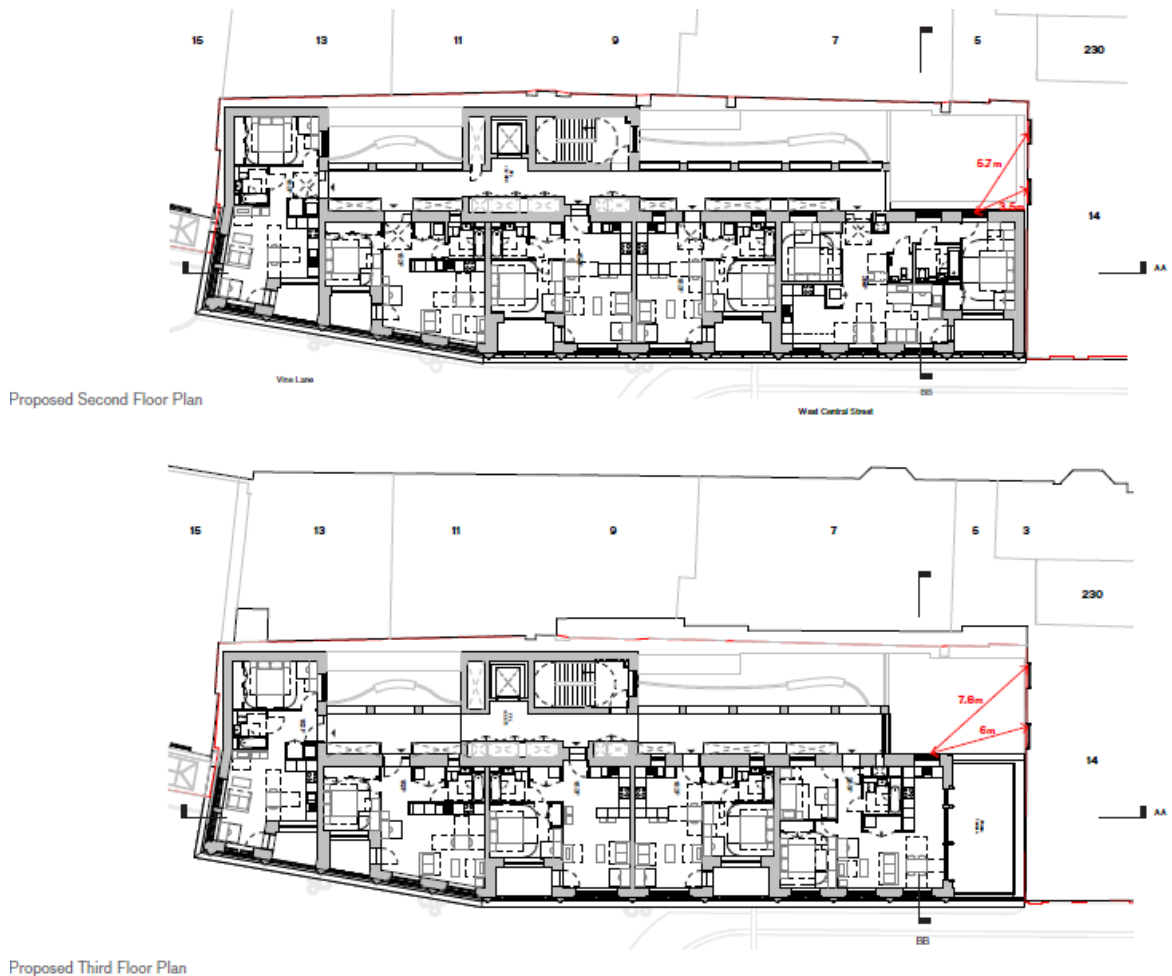


Figure 34. Separation distances

- 13.46 An outdoor terrace is proposed on the roof (fourth floor level) of the Vine Lane Building. Without adequate mitigation, there would be a loss of privacy, particularly to the rear of the Grape Street properties, but also to 14 West Central Street. Therefore, a solid screen would be erected to screen views. A condition is attached requiring details of this screen. Furthermore, a 0.7m zone of low-level planting to the perimeter of the terraces increases the distance between the tenants using the terrace space and the neighbouring properties by preventing the users of the terrace space from standing at the terrace edge.

#### Noise

- 13.47 A Noise and Vibration Impact Assessment was submitted which assesses the noise impacts associated with the proposed development. This assessment was reviewed by an Environmental Health Officer.
- 13.48 Appropriate noise guidelines have been followed within the report such as Noise Policy Statement for England, National Planning Policy Framework (NPPF), Planning Practice Guidance on Noise, BS 8233 Guidance on sound insulation and noise reduction for buildings, Camden Council's Local Plan, version June 2017 and BS 4142:2014 "Methods for rating and assessing industrial and commercial sound". The submitted plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building.

- 13.49 The maximum day time noise level in outdoor living areas exposed to external road traffic noise should not exceed 50dBA Leq to ensure there is no material noise impact.
- 13.50 The applicant will have to ensure adequate sound insulation is provided between separate units to ensure future occupiers are protected.
- 13.51 The assessments indicates that the proposed plant should be capable of achieving the proposed environmental noise criteria with specified noise mitigation at the nearest and potentially most affected noise sensitive receptor.
- 13.52 Given suitable facade design specification and mechanical plant noise level criteria, officers are satisfied that the submitted acoustic submissions meets local plan guidelines and therefore are acceptable in environmental health terms.
- 13.53 Conditions are attached on noise limits, vibration and sound insulation.

#### Conclusion

- 13.54 An assessment of the amenity impacts on neighbouring properties has been undertaken. This has been independently reviewed. Five buildings would experience daylight losses above the BRE guidelines, including a student block. 14 West Central Street is the worst affected building, but these windows are on the party wall, facing directly on to the application site and receiving all their light across the application site. For this part of the site to be developed, there will be impacts on these windows. The impacts outlined above, on neighbouring windows, are considered acceptable, especially given the planning balance. The scheme has been designed to minimise loss of privacy. The proposals are acceptable in terms of noise, subject to conditions.

## **14 HEALTH IMPACT**

- 14.1 Camden Local Plan policy C1 seeks to promote strong, vibrant, and healthy communities. A Health Impact Assessment (HIA) has been carried out by the applicant and the findings of the assessment have been submitted as part of this application. The Proposed Development's potential health impact has been assessed based on the HUDU Planning for Health Rapid HIA Tool.
- 14.2 The submitted HIA finds that there would be a number of positive health impacts from the development, with the provision of new homes, including affordable housing, a car free development, strengthened pedestrian routes on West Central Street and a new pedestrian/cyclist route linking West Central Street and High Holborn. There would be an increase in employment under the proposals which is also a positive health impact. The proposals have been designed to minimise crime and fear of crime, which disproportionately affects women and the elderly. The proposed flats have been designed to provide a high standard of amenity to future occupants, in terms of space, light and outdoor space. New public realm and planting would be provided and the UGF of the site would be increased to 0.3.

- 14.3 To mitigate potential negative health impact from construction impacts in terms of noise, dust and pollution, a Construction Management Plan would be secured via section 106 agreement.
- 14.4 People on low-incomes or unemployed would particularly benefit from the provision of affordable housing, as well as increased levels of employment.

## **15 BASEMENT IMPACT**

- 15.1 Camden Local Plan policy A5 (Basements) seek to permit basement development where it is demonstrated that it will not cause harm, structurally, in amenity terms, environmentally or in conservation/design terms.
- 15.2 The site is subject to two underground constraints on site - slope stability and subterranean groundwater flow.
- 15.3 Selkirk House has two basement levels and a further partial basement level. It is proposed to retain the existing basements under Selkirk House. An additional basement would be created at Vine Lane. Underpinning and piling is proposed in the existing Selkirk House basement levels and existing basements under properties in the West Central Street block.
- 15.4 The application was accompanied by a Basement Impact & Structural Impact Assessment. This assessment found that all of the properties that were tested were predicted to experience building damage no worse than Burland Category 1 ('slight'), which is just aesthetic damage rather than structural damage.
- 15.5 An independent review was carried out by the Council's basement consultant (Campbell Reith) who reviewed the Basement Impact and Structural Impact Assessment for potential impact on land stability and local ground and surface water conditions arising from basement development in accordance with Camden's policies and technical procedures.
- 15.6 The basement at Vine Street would be approximately 6.50m deep with the secant (interlocking) piled wall to extend a further 4m. Groundwater is estimated to be at 5m depth within the aquifer.
- 15.7 The estimation of the groundwater level is reasonable. The secant piled wall will form a cut off as it is embedded in the low permeability London Clay. The BIA notes that dewatering will be required (page 9). This will largely be restricted to the water contained within the basement perimeter as there will be little, if any, recharge of the groundwater because of the cut off formed by the piles.
- 15.8 The BIA has demonstrated that impacts to stability and the water environment can be limited to comply with Camden's policies. The Basement Construction Plan will be required to demonstrate that the impacts to stability and the water environment from the finally adopted below ground works will also comply with policy.
- 15.9 Campbell Reith concluded that the BIA is adequate and in accordance with the criteria laid out in policy A5 and guidance contained in CPG Basements and Lightwells. The BIA has identified the impacts of the basement proposals on stability

and the water environment are either acceptable or could be mitigated sufficiently to be acceptable. The detailed monitoring scheme and contingency actions will be prepared on the basis of the final detailed design and will form part of the BCP. The proposed basement is therefore considered acceptable, subject to a Section 106 obligation requiring a Basement Construction Plan (BCP).

## **16 AIR QUALITY**

- 16.1 Camden Local Plan policy CC4 is relevant with regards to air quality.
- 16.2 An Air Quality Assessment (AQA) has been submitted as part of this application which was assessed by an Air Quality Officer.
- 16.3 The site is in an area of poor air quality for NO<sub>2</sub>, especially on New Oxford Street and High Holborn. A number of residential units would have annual NO<sub>2</sub> levels over the national objective level of 40µg/m<sup>3</sup> and some units over 5% above this at over 42µg/m<sup>3</sup>. These units are located in the High Holborn block and New Oxford Street. The New Oxford Street buildings are already in residential use, and so this application is not introducing this land use. These dwellings also have a rear aspect and so can ventilate their properties from the rear. The High Holborn block would have air intake from the rear, where air quality is better. However, the first floor rooms facing New Oxford Street and High Holborn do not comply with the WHO standards or the requirements of London Plan Policy SI B 1) c) to not create an unacceptable risk of high levels of exposure to poor air quality however, in line with Policy SI B 2) b), the development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air pollution, or mitigation is required. As the design has not been able to prevent exposure then for facades above the national objective the proposed mitigation of MVHR with air inlets from as close to roof level as possible and away from busy roads plus for facades over 5% above the national objective sealed windows should be provided on the first floor of these properties facing New Oxford Street and High Holborn and secured through condition. MVHR is acceptable for the first floor flats on these streets, but no other residential properties in the development.
- 16.4 Emergency Generators are proposed, however the flue from one of the generators is not at least 1m above the height of the tallest building in a 20m radius. A condition is attached requiring this to be over 1m.
- 16.5 The proposals are car-free, and are Air Quality Neutral.
- 16.6 The proposals are considered acceptable in terms of air quality subject to conditions on emergency generator flues, combustion flues and diesel back-up generators. The proposals do not comply with the London Plan requirements to use design solutions to prevent exposure to poor air quality for the New Oxford Street buildings and High Holborn block however mitigation is required by condition including MVHR with inlets from as close to roof level as possible and away from busy roads, sealed windows on very polluted facades and advising occupiers of health risks to reduce exposure and meet the requirements. It would not be possible to set these buildings back from the road without seriously impacting on the delivery of residential use, the Council's priority land use.

16.7 Air quality during demolition and construction would be managed with the CMP, which is secured by section 106. Real time air quality monitoring is required by condition.

## **17 MICROCLIMATE**

17.1 Policy A1 of the Camden Local Plan 2017 acknowledges the impact that large developments can have on the local climate. CPG Amenity requires new developments to consider the local wind environment, local temperature, overshadowing and glare both on and off site.

17.2 Additional guidance from TfL's Healthy Streets for London recommends that streets should design in opportunities for sun, shade, and shelter from high winds to create places that can be enjoyed all year round.

17.3 Policy A2 of the Local Plan recognises that the quality of open spaces is closely linked to the degree to which it is overshadowed.

17.4 The microclimatic impact of a tall building on its local environment at ground level as a result of increased wind speeds is an important area of assessment of the acceptability of the proposed tower. An Environmental Wind Planning Report has been submitted as part of the planning application. The wind assessment was carried out to determine the wind conditions in the surrounding area if the buildings were to be constructed.

17.5 The tall building has been designed so that there are no flush, sheer facades which would channel wind downwards. Entrances to buildings are recessed to ensure comfort for pedestrians entering and leaving.

17.6 The wind planning report concluded that with the proposed development including the landscaping in place, the level of windiness would be generally similar to the existing. The level of windiness would be suitable for pedestrian activities. There would be increased levels of windiness as compared to existing on West Central Street, but it would still be comfortable for 'Strolling' under the Lawson criteria. The proposals have been designed to minimise microclimatic impact and under the Lawson criteria it would still be comfortable for pedestrians.

## **18 SUSTAINABLE DESIGN AND CONSTRUCTION**

18.1 The sustainable design and construction considerations are as follows:

- Introduction and policy review
- Redevelopment strategy
- Demolition of the existing buildings
- Whole Life Carbon
- Energy and carbon reductions
- Energy and carbon summary
- Total carbon reductions
- Be lean stage
- Be clean stage

- Be green stage
- Be seen stage
- Climate change adaption and sustainable design
- Sustainability
- Conclusion

#### Introduction and Policy Review

18.2 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.

18.3 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage. Further details of each policy are set out in relevant sections below.

18.4 A Sustainability Statement, Whole Life Carbon Comparison, Retention & Redevelopment Options Review and WLC Comparison Addendum, Retention & Redevelopment Options Review & WLC comparison, Survey Statement, Whole Life Carbon Addendum and a Pre-Demolition Audit have been submitted as part of this application.

#### Redevelopment strategy

18.5 Policy CC1 of CLP requires that proposals that involve substantial demolition demonstrate that it is not possible to retain and improve the existing building. The policy does not state that the demolition of existing buildings is unacceptable, but requires that in all cases consideration must be given to the refurbishment and reuse of the building before demolition is accepted. The London Plan states at Policy SI 7 that the redevelopment of sites should minimise the use of new materials and follow circular economy principles.

18.6 Taking into account the condition of the existing building and feasibility of re-use, it is necessary to use the following hierarchy to explore options for the existing site, with the aim of optimising resource efficiency. All options should achieve maximum possible reductions for carbon dioxide emissions and include adaptation measures, in accordance with the Council's Development Plan and CPG.

- I. Refit
- II. Refurbish
- III. Substantial refurbishment and extension
- IV. Reclaim and recycle.

18.7 The 'Retention & Redevelopment Options Review & WLC Comparison' and the 'Clarifications and Responses on Demolition Justification including Pre-Redevelopment Audit and Retention options appraisal' reports submitted by the applicant include a review of existing building conditions. A schedule of surveys undertaken to determine the technical condition of existing buildings and to inform the design process has also been provided. The schedule includes a list of investigations, including intrusive surveys, conducted in the period between April

2019 and January 2023, on both elements of the existing site (Selkirk House and the West Central Street block). Camden's CPG guidance suggests exploring different uses to maximise reuse opportunities for existing buildings; evaluation of alternative uses is provided in the 'Clarifications and Responses on Demolition Justification including Pre-Redevelopment Audit and Retention options appraisal' report. The optioneering study includes only options for a commercially led development of Selkirk House. The location lends itself to commercial led development (see landuse section) and so the optioneering undertaken is appropriate for the site context.

#### Demolition of the existing buildings

- 18.8 The development plan policies in the Camden Local Plan and London Plan encourage resource efficiency through conversion, reuse and adaption of existing buildings, particularly Local Plan policy CC1(e) which states the council will require all proposals that involve substantial demolition to demonstrate it is not possible to retain and improve the existing building. The development plan echoes the NPPF, at paragraph 152, which says planning should support a transition to a low carbon future by contributing to radical reductions in greenhouse gas emissions and encouraging reuse of existing resources, including buildings.
- 18.9 Large-scale developments in particular present opportunities for innovative building design that avoids waste, supports high recycling rates and helps London transition to a low carbon and circular economy, where materials, products and assets are kept at their highest value.
- 18.10 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.
- 18.11 London Plan (2021) Policy SI 7 in terms of circular economy requirements and a Circular Economy Statement accompanies this planning application.
- 18.12 A Retention & Redevelopment Options Review has been submitted as part of this application, including a pre-redevelopment audit. This information has been reviewed by officers and Hilson Moran who were appointed by the Council's to provide an independent third-party review.
- 18.13 Under the proposals, the vast majority of Selkirk House would be demolished, with only the basements retained. The basement levels that would be retained constitute 25% of the structure (by weight) of Selkirk House. Substantial objection has been submitted to the proposals on sustainability grounds. Local residents and groups argue that it would be more sustainable to retain and reuse the existing buildings and that option is one which is feasible.
- 18.14 Options for re-use of the existing Selkirk House building have been considered. The loss of the multi-storey car park (ground to 3rd floor) is accepted as officers would not want this to be retained for sustainability, transport and design reasons. This includes the positive carbon and air quality impact of reducing private car ownership. It is considered that this part of the building cannot reasonably be repurposed for another use with very limited and restrictive use cases (which would also go against long term sustainability principles) and therefore in order to make

efficient use of the land would need to be demolished. This constitutes around 40% of the structure (by weight).

- 18.15 Given the above, the options for retention and reuse of the remaining tower relates to just 35% of its structure, by weight.
- 18.16 Floors 14-15 (7% of structure by weight) are structurally complex with sheer walls at the gable ends (instead of curtain wall glazing) and thicker slabs and very constrained. These cannot be retained except for very limited uses which would again reduce the ongoing sustainable and adaptable use of the building.
- 18.17 The building has two cores at present, but these would require significant improvement to allow for reuse of the building, including to meet current fire safety regulations.
- 18.18 Given the above, the acceptance that retention of the ground to third and 14-15 floors is neither feasible, nor desirable, the option for reuse and retention relates solely to floors 4-13, which constitute 25% of the structure by weight.
- 18.19 It is accepted that a retained building would likely require a full MEP renewal and a new façade.
- 18.20 The applicant argues that reuse of Selkirk House as a hotel is not a viable option. Officers accept that major refurbishment works would be required to bring the building up to a standard for modern hotel use, though this would not be impossible. Notwithstanding this, the previous hotel use has not operated on the site for some time and this use became redundant. There is no current proposal coming forward to reinstate this use, and undertake the significant refurb necessary to reinstate it, with an already significant pipeline of hotel accommodation for the future (see land use section). The building could be repurposed for residential use (or re-used for residential as per the eleven vacant maisonettes), however, it is noted that this would also require extensive refurbishment. The majority of the units would be single aspect, given the cores, floorplate and layout. There are structural issues with the building restricting the ability to reuse it. The façade cannot be retained for fire safety reasons as well as issues around poor energy performance. The façade, which was added later, is also of poor design quality. The applicant argues that the existing very tight column grid makes the building more difficult to reuse. Officers accept that this limits the flexible reuse of the building given the cellular layout and number of columns on each floor plate. The tight column grids would also make it much more difficult to provide larger family-sized accommodation, alternatively, the units would be oversized making inefficient use of the building volume. The low floor to ceiling heights are also restrictive although could potentially comply with BCO guidelines for refurbished buildings with a perimeter servicing strategy. Notwithstanding all these points, the reality is that the retention of the tower would be structurally very difficult, with the demolition of the car park podium at ground to 3rd floor levels (an element of the building we wish to be removed), as this is a supporting structure for the tower.
- 18.21 Given the above, officers accept that a retrofit, refurbishment or extension option, would be difficult to deliver, for structural and design reasons. The level of adaption required, which could prove less valuable floorspace (small awkward



spaces or oversized spaces and units), would likely have further detrimental impacts on the current viability position. Only 25% of the tower structure, by weight, could reasonably be retained and reused (above the 25% of the structure which is being retained in the basements) so a maximum of 50%. The preferred option is for demolition of the whole tower above ground, so demolition of 75% and retention of 25% by weight would allow for removal of the car park, for comprehensive redevelopment of the site. This would bring substantial social, economic and environmental benefits. One particular benefit of the proposed scheme is reinstating a route through between West Central Street and High Holborn, which would not be deliverable without substantial demolition.

18.22 The buildings proposed for demolition in the West Central Street block are much smaller than Selkirk House. The retention and reuse of these buildings would severely restrict the scheme – particularly as this is where much of the residential use is being proposed. Redeveloping these buildings allows for substantial benefit in terms of housing delivery, including affordable housing.

18.23 There is potential to retain parts of the building even though it would still result in significant levels of alteration and refurbishment. However, these would not propose to deliver the same benefits as the current proposal. The Save Museum Street report points appears to dismiss other planning considerations as “entirely subjective” (page 9) but the proposal has to be considered in line with the development plan as a whole, not only with reference to one or two issues (like those set out in CLP policy CC1 and LP policy SI7), even though those issues may be given considerable weight.

18.24 Even where demolition is a reasonable option to deliver a scheme and the benefits it brings, the principles of resource efficiency still apply with the ability to reuse and recycle materials from the site, with reuse on site being the preferred option. To ensure greater resource efficiency through recycling and reuse of materials, a condition is attached requiring 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use, as per London Plan policy SI7.

#### Whole Life Carbon

18.25 A Whole Life Carbon (WLC) assessment is required to show that any replacement building has considered the carbon impact of the construction and use of the building over its lifetime. This should be in line with the GLA WLC assessment guidance and benchmarks.

18.26 The development plan promotes circular economy principles and Camden Local Plan policy CC1 and London Plan policy SI7 require proposals to optimise resource efficiency. These development plan policies require calculation of whole life-cycle carbon emissions and demonstration of actions taken to reduce life-cycle carbon emissions so these impacts can be considered in assessing a proposal.

18.27 The Whole-Life Carbon (WLC) emissions are the total carbon emissions resulting from the construction and the use of a building over its entire life (this is assessed as 60 years), and it includes its demolition and disposal. This is split into modules that assess each stage of the building’s life.

18.28 The A-Modules concentrate on the emissions from the building materials (A1-A3 extraction, supply, transport and manufacture) and the construction stages (A4-A5 transport, construction and installation). The B-Modules concentrate on the use stage of the building (B1-B5 use, maintenance, repair, replacement, refurbishment), but the modules that deal with operational energy and water use are excluded (B6-B7). This is because they are “regulated emissions” and so are considered separately and in detail in relation to the zero-carbon target (see the “Energy and carbon reductions” section below). The C-Modules deal with the end-of-life stage of the building (C1-C4 deconstruction demolition, transport to disposal, waste processing for reuse, recovery or recycling, disposal).

18.29 Carbon sequestration is when carbon dioxide is removed from the atmosphere and held in materials, for example the carbon absorbed by trees as they grow and locked in timber until the end of its life. It is important to consider this in the end-of-life phase because the carbon is released again at the end of its life (when it decomposes), so it is included in the total A-C-Modules.

18.30 The GLA WLC assessment guidance sets out minimum benchmarks for different building typologies per square metre of gross internal area in kilograms of carbon equivalent (kgCO<sub>2</sub>e/m<sup>2</sup> GIA). It also encourages development to aim for more ambitious aspirational benchmarks. The tables below show how the development performs against the benchmarks, as well as the aspirational targets.

18.31 Hilson Moran were instructed as a third-party consultant to undertake an independent review of the ‘Whole Life Carbon Assessment’ for the proposed design (as well as the ‘Retention & Redevelopment Options Review and WLC Comparison’ report). Their comments are included through this section of the report. Figures for different levels of GGBS (Ground Granulated Blast-furnace Slag) a lower carbon form of concrete have been included. The material is a by-product of the iron making industry and has limited supply and therefore, whilst this is aspirational and being delivered on another current scheme, this may be difficult to achieve as this is a very high proportion for a large development. The figures show that the impact of the assumption is significant but does not affect the achievement of benchmarks.

Site Wide

<b>Modules</b>	<b>Min benchmark for OFFICE (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>Aspirational Benchmark for OFFICE (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>Site Wide Proposal (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>
A1-A5	<950	<600	732.22 (if 70% GGBS) OR 772.17 (if 20% GGBS)
B-C (excl B6 & B7)	<450	<370	413.275
Total A-C (ex B6&B7 inc sequestration)	<1400	<970	1117.301

1 Museum Street

<b>Modules</b>	<b>Min benchmark for OFFICE (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>Aspirational Benchmark for OFFICE (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>1 Museum Street Proposal (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>
A1-A5	<950	<600	734.581 (if 70% GGBS) OR 770.581 (if 20% GGBS)
B-C (excl B6 & B7)	<450	<370	436.720
Total A-C (ex B6&B7 inc sequestration)	<1400	<970	1141.902

Vine Lane block

<b>Modules</b>	<b>Min benchmark RESIDENTIAL (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>Aspirational Benchmark for RESIDENTIAL (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>Vine Lane Proposal (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>
A1-A5	<850	<500	881.555 (if 70% GGBS) OR 945.555 (if 20% GGBS)
B-C (excl B6 & B7)	<350	<300	365.374
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	1235.744

High Holborn block

<b>Modules</b>	<b>Min benchmark RESIDENTIAL (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>Aspirational Benchmark for RESIDENTIAL (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>High Holborn Proposal (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>
A1-A5	<850	<500	792.763 (if 70% GGBS) OR 832.763 (if 20% GGBS in sub and super structures)
B-C (excl B6 & B7)	<350	<300	426.426
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	1203.424

West Central block

<b>Modules</b>	<b>Min benchmark RESIDENTIAL (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>Aspirational Benchmark for RESIDENTIAL (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>West Central Proposal (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>
A1-A5	<850	<500	587.421 (if 70% GGBS) OR 639.421 (if 20% GGBS in sub and super structures)
B-C (excl B6 & B7)	<350	<300	376.654
Total A-C (excl B6&B7 but inc sequestration)	<1200	<800	930.365

18.32 The benchmarks, and preferably the aspirational benchmarks, should be met for each of the modules and for the total whole life emissions. In this case site wide the proposals meet the GLA benchmarks but not the aspirational benchmarks (stated to be 'largely due to the concrete substructure and frames, with elements of steel profiles'). 1 Museum Street and West Central buildings also meet the benchmarks for all modules. It is noted that the Vine Lane and High Holborn, which are both new residential buildings, do not meet all the benchmarks. The addendum notes that for High Holborn this is stated to be "largely due to high replacement of services products in line with RICS assumptions. This would be improved at the next work stage with MEP products prioritised for specification that have lower embodied carbon impact and higher life cycle where possible". For Vine Lane it is stated that

“reduced figures for construction site impacts are now available as part of the draft RICS PS Guidance (2nd Edition) which would bring the A module within the benchmarks if applied. Module B-C is also outside the benchmarks, resulting in A-C being outside. This will be reduced through design and material specification in the next work stage”.

18.33 The WLCA undertaken for the proposed scheme demonstrates that the current level of performance is in line with the GLA, LETI and RIBA business as usual benchmarks, though do not meet the GLA aspirational targets or 2025/2030 design targets. The assessment by Hilson Moran states that pre-construction demolition, upfront and lifecycle embodied carbon results appear reasonable and consistently evaluated across the different options at this stage of the project.

Energy and carbon reductions

18.34 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2) and major developments should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).

18.35 After we are satisfied that carbon has been reduced as much as possible on-site, an offset fund payment should be secured to address any failure to achieve net zero carbon.

Energy and carbon summary

18.36 The following summary table shows how the proposal performs against the policy targets for carbon reductions in major schemes, set out in the London Plan and Camden Local Plan.

<b>Policy target (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Total carbon reduction: LP policy SI2 and LP CC1	35%	46.1%
Be lean stage (low demand): LP policy SI2	10% - residential 15% - commercial	14.9% - residential <b>12.7% - commercial</b>
Be green stage (renewables): CLP policy CC1	20%	37.6%

Figure 35 – Total Site Wide Carbon saving targets

<b>Policy target (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Total carbon reduction: LP policy SI2 and LP CC1	35%	<b>21.8 %</b>
Be lean stage (low demand): LP policy SI2	15%	<b>11.2 %</b>
Be green stage (renewables): CLP policy CC1	20%	<b>11.9 %</b>

Figure 36 – 1 Museum Street non residential Carbon saving targets

<b>Policy target (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Total carbon reduction: LP policy SI2 and LP CC1	35%	25%
Be lean stage (low demand): LP policy SI2	15%	19.2 %
Be green stage (renewables): CLP policy CC1	20%	7.2 %

*Figure 37– Vine Lane non residential Carbon saving targets*

<b>Policy target (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Total carbon reduction: LP policy SI2 and LP CC1	35%	19%
Be lean stage (low demand): LP policy SI2	15%	10.2%
Be green stage (renewables): CLP policy CC1	20%	9.8%

*Figure 38 – High Holborn non residential Carbon saving targets*

<b>Policy target (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Total carbon reduction: LP policy SI2 and LP CC1	35%	16.7%
Be lean stage (low demand): LP policy SI2	15%	15.3%
Be green stage (renewables): CLP policy CC1	20%	1.6%

*Figure 39 – West Central non residential new build Carbon saving targets*

<b>Policy target (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Total carbon reduction: LP policy SI2 and LP CC1	Greatest possible reduction	41.7%
Be lean stage (low demand): LP policy SI2	No increase	38.1%
Be green stage (renewables): CLP policy CC1	20%	5.8%

*Figure 40 – West Central non residential refurbishment Carbon saving targets*

<b>Policy target (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
Total carbon reduction: LP policy SI2 and LP CC1	35% (50% stretched target)	76.5%
Be lean stage (low demand): LP policy SI2	15%	15.9%
Be green stage (renewables): CLP policy CC1	20%	72.1%

*Figure 41 – Total residential new build Carbon saving targets*

<b>Policy target (on site)</b>	<b>Min policy target</b>	<b>Proposal reductions</b>
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Total carbon reduction: LP policy SI2 and LP CC1	Greatest possible reduction	82.2%
Be lean stage (low demand): LP policy SI2	No increase	13.7%
Be green stage (renewables): CLP policy CC1	20%	79.4%

Figure 42 – Total residential refurbishment Carbon saving targets

Total carbon reductions

18.37 Reductions are measured against a baseline which is calculated using requirements set out in the Building Regulations. Major new development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021). The remainder of the carbon savings to 100% reduction (zero carbon) should then be secured through a carbon off-set payment. This is charged at £95/tonne CO<sub>2</sub>/yr (over a 30 year period) which is spent on delivery of carbon reduction measures in the borough.

18.38 It is acknowledged that due to the changes to Part L 2021 with SAP10.2 carbon factors, these targets may be more challenging for non-residential developments to achieve initially. This is because the new Part L baseline now includes low carbon heating (like ASHP) for non-residential developments.

18.39 Residential development should be exceeding the target now, so the GLA guidance has introduced a more challenging aspirational target of 50% on-site total savings that residential development should aim to achieve.

18.40 In this case, using the up-to-date Part L 2021 carbon calculations, the development as a whole meets the policy target of 35% reductions, achieving an overall on-site reduction of 46.1% below Part L requirements as shown in Figure 35 above. The 76.5% carbon reduction for the residential new build areas also exceed the 50% improvement benchmark with a reduction of 15.9% through energy efficiency but mostly through a 72.1% reduction from renewable energy. The reduction in carbon from the non-residential new build areas ranges from 16.7 to 25% (or 22.6% for all non-residential areas) which does not meet the 35% minimum reductions on site. The new Part L 2021 baseline for commercial developments is now more stringent and assumes carbon savings like low carbon heating to be incorporated into the design for Building Regulations. As a result, reductions from that more stringent baseline are now harder to achieve for commercial developments, compared to the older requirements which were in place at the time of setting the policy. A carbon offset of £183,540 would be secured by Section 106 legal agreement to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

18.41 London Plan policy SI 2 sets policy targets for reduction of at least 10% (for residential) and 15% (for non-residential) through reduced energy demand at the first stage of the energy hierarchy.

18.42 In this case, the development meets the policy target of 10% for the new residential areas, reducing emissions by 15.9%. It also meets the target for the small

non-residential areas in Vine Lane and West Central Street. However, it does not meet the non-residential policy target of 15% for new non-residential for 1 Museum Street (11.2%) or High Holborn (10.2%). The proposals do generally involve good levels of insulation, low air permeability, efficient glazing, and address the requirements of the cooling hierarchy and overheating through the provision of natural ventilation where possible which can avoid the use of active cooling in the development. The proposal includes energy efficient measures like efficient MVHR and low energy light fittings, but further measures such as waste water heat recovery are not currently proposed. The applicant has accepted that given that the 15% reduction target for the non-residential areas has not been met for the new Part L 2021 baseline, further opportunities for energy efficiency, including waste water heat recovery, should be explored. A condition is recommended requiring a feasibility assessment into wastewater heat recovery with the aim of maximising the energy efficiency of the development. If not feasible, this would have to be clearly justified, and would ensure all reasonable measures have been taken to minimise on site carbon in line with the development plan.

#### Be clean stage (decentralised energy supply)

18.43 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.

18.44 A site wide air source heat pump (ASHP) led network is proposed but not a district heating network and potential waste heat sources have not been explored. The submitted 'Energy Centre Location Plan' includes route for piped connection and plant room for potential future connection to a district heating network. This would be secured through the section 106 agreement to ensure future proofing for a District Heat Network. A low carbon heat network feasibility study would also be secured via condition, along with details of the ASHP network.

#### Be green stage (renewables)

18.45 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean stages), where feasible, for the third stage in the energy hierarchy.

18.46 In this case, site wide the development exceeds the policy target of 20%, reducing emissions by 37.6% at this stage through renewables, in compliance with the development plan. The proposal includes Air Source Heat Pumps (ASHPs). Museum Street and Vine Lane will be provided with ASHPs connected to a condenser loop system providing a heat source/sink for local water-cooled heat pumps located throughout. A separate condenser loop system is proposed for West Central Street. High Holborn is to have a decentralised ASHP solution comprising a dedicated ASHP for each dwelling providing low temperature hot water heating and domestic hot water. The seasonal efficiency (SCOP) of the proposed ASHP for heating varies from 2.57 to 2.95 for the residential areas which is considered to be lower than an A rating. The non-residential SCOP is 3.5 which would be considered an A. It is recommended that all of the ASHP have an SCOP of at least 3.4 or an SPF (seasonal performance factor) of 2.5. A condition is recommended to ensure



these standards are met and the systems properly maintained. No solar PV is proposed due to other uses of available roof space or overshadowing. Nonetheless, there may still be scope for further feasibility work which would further improve the carbon savings. A condition is recommended to ensure all opportunities for solar PV have been fully explored.

Be seen stage (energy monitoring)

- 18.47 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting. Requirements for reporting and monitoring will be secured as part of the s106 legal agreement incorporated into the energy and sustainability plan. Furthermore, several conditions require monitoring, including post construction monitoring of whole-life carbon, and circular economy. These also secure reporting to the GLA in line with the London Plan.

Climate change adaption and sustainable design

- 18.48 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent, the CPG Energy Efficiency and Adaptation sets out in section 11 an expectation for at least 60% of the available credits in Energy, 60% in Water and 40% in Materials categories to be achieved to give the greatest environmental benefits.
- 18.49 In this case, 1 Museum Street new construction office is expected to achieve an overall score of BREEAM excellent, with 76% of energy, 78% of water and 50% of materials credits expected which would exceed the requirements. For 1 Museum Street retail the overall score of BREEAM excellent is expected, with 61.5%% of energy, 100% of water and 50% of materials credits expected which would again exceed the requirements. For West Central Street domestic refurbishment the overall score BREEAM excellent is expected with 77% of energy, 60% of water and 66.7% of materials credits expected which would also exceed the aspirations. As a result, the scheme would exceed these targets in the development plan and these measures and targets would be secured through the section 106 legal agreement.

Overheating

- 18.50 It was initially proposed that all windows needed to be fixed shut which faced onto West Central Street and High Holborn due to night-time noise (at all floors) and this would have resulted in increased potential for overheating and a need for active cooling of residential properties. Officers did not consider that this was justified as it would place increased energy demand on the units. Officers consider the first-floor residential areas only facing onto New Oxford Street, High Holborn and Museum Street to require sealed windows. This is due to very poor air quality with the annual NO<sub>2</sub> over 42µg/m<sup>3</sup>. Therefore, for these units only cooling is considered to be justified in line with the development plan. It is recommended that the applicant should demonstrate through a condition prior to occupation that the active cooling units have a minimum set point of 26 degrees, limiting energy demand. With regards noise issues, residents would have the ability to close windows should this be a problem, whereas residents would not be aware of air quality and would not know when levels were dangerous.

18.51 The results of the Dynamic Overheating Analysis, using the CIBSE TM59 methodology, demonstrate that all units pass assuming a g-value of 0.47 and openable windows (apart from those accepted as sealed, as set out above). The applicant has confirmed that the overheating assessment has taken account of all the requirements and limits set out in Approved Document O. However, there are failures reported at the West Central Street and High Holborn sites when windows are assumed closed due to air quality issues. The Vine Lane site is not affected by these constraints.

18.52 The area weighted average (MJ/m<sup>2</sup>) and total (MJ/year) cooling demand for the actual and notional building specification has been provided, and the applicant has demonstrated that the actual building's cooling demand would be lower than the notional specification.

18.53 Mixed mode ventilation is proposed for the non-domestic element. A Dynamic Overheating Analysis has been undertaken using the CIBSE TM52 methodology. Its results demonstrate that the spaces fail, with natural ventilation alone. Cooling has been proposed in these non-domestic (commercial) spaces and this is accepted in this case.

#### Water efficiency

18.54 Local Plan policy CC3 requires development to incorporate water efficiency measures and residential areas are expected to meet the requirement of 105 litres per person per day (plus 5 litres for external water use). Major developments should include a grey or rainwater harvesting system. In this case, water efficient sanitary ware will be installed in the residential areas and a maximum water use of 105l/p/d is proposed. A condition is recommended to secure this. It is stated that there is no space in the basement for grey or rainwater storage however no further details have been provided at this stage. A condition is recommended to ensure a feasibility study into grey/rainwater recycling is undertaken prior to implementation, as the detailed design of the building is worked up after planning stage.

18.55 The scheme proposes a range of sustainability measures including SuDS, sustainable building materials and water conservation measures such as attenuation tanks and blue roof storage. A condition secures further details of the SuDS and their maintenance, and a sustainability plan secured by s106 legal agreement will secure other sustainable building measures.

#### Conclusion

18.56 The proposed development involves the substantial demolition of existing buildings on the site. This is regrettable as the Council, where possible, does seek buildings to be retained and reused. Alternative options have been explored with lesser demolition or refurbishment options potentially possible, but these would not be able to deliver on as many of the social, economic and public realm objectives of the development plan, or to the same extent, when considering the plan as a whole. In this case the loss of 75% of Selkirk House and the buildings to be demolished at 16-18 West Central Street are accepted because of the challenges that are presented in reusing the existing buildings, as well as the benefits of comprehensive redevelopment. The proposed demolition of 75% of Selkirk House will allow for the loss of the car park which brings with it longer-term sustainability benefits, the creation of a new route through the site to improve the pedestrian

environment and further promotes the use of sustainable modes of transport. Furthermore, the proposed redevelopment will bring with it other social, environmental and economic benefits including the provision of high-quality office floorspace, residential floorspace (including affordable housing) space, public realm enhancements and ground floor activation.

18.57 The proposed development is a car-free scheme of a suitable density for this Central London location within a growth area. The principle of the scheme is therefore highly sustainable in terms of transport, location and density. The embodied carbon of the scheme is more than the London Plan aspirations, but overall, the sustainability and energy targets are generally in line with the development plan's policy requirements. Operational carbon performs well against policy targets site wide, with residential new build performing well and contributing to a low carbon future. Sustainability and energy measures would be secured via section 106 and planning conditions which have the potential to make further improvements to the climate credentials of the scheme as it is worked up into more detail following planning stage.

18.58 The M&S decision from the Secretary of State (APP/X5990/V/3301508) took the view that there was conflict with the design and heritage policies and given the importance of these policies to determination of the case that the proposal was in conflict with the development plan as a whole. He went on to consider the material considerations to decide if there is justification for granting other than in line with the development. The benefits were noted, but weighing against the proposal were its failure to reuse existing resources which was given moderate weight and the less than substantial harm to a number of designated heritage assets. However, these factors were not outweighed by the public benefits in that case.

18.59 In the case of this application, there will be the loss of a number of buildings on site, but the option for their retention has been explored and considered, and found to be possible, but nonetheless restrictive and potentially costly. This means the application does not perform to the full expectations of the climate aspirations of the development plan but some of the other measures and considerations mitigate this impact. The loss of the non-designated heritage assets and impact on heritage assets would cause less than substantial harm, but in this case the public benefits of the scheme are more significant; there would be new employment opportunities, improved public realm, a new route but most importantly new homes including 19 new affordable homes. The tilted balance applies in this case (see previous sections) and the provision of new homes, including affordable housing has been given considerable weight. Whilst there are some shortfalls against individual policy objectives and aspirations in terms of energy and sustainability, overall, the scheme is considered to be in accordance with the development plan.

## **19 FLOOD RISK AND DRAINAGE**

19.1 Policy CC3 is relevant with regards to flood risk and drainage.

19.2 The site is located within Flood Zone 1. There are 3 flood zones for flooding by rivers and the sea as defined by the Environment Agency; Flood Zones 1, 2 and 3. These are based on the likelihood of an area flooding, with flood zone 1 areas least likely to flood and flood zone 3 areas more likely to flood. The site has a Low

fluvial risk of flooding, Low Surface Water risk and Low Groundwater risk of flooding. The site is not on a previously flooded street or in a Local Flood Risk Zone.

- 19.3 A Flood Risk Assessment and a Below Ground Drainage Strategy have been submitted as part of this application. The submitted documents include pro-forma, drainage calculations, exceedance flow routes and maintenance tasks ownership. SUDS are proposed.
- 19.4 Blue roofs (on West Central Street and Museum Street buildings) and below-ground attenuation tanks at, or below, basement level are proposed as attenuation features with addition green roof areas. This will improve drainage significantly on the site from 151.22 l/s in a 1 in 100 rainfall event to 10 l/s.
- 19.5 The Lead Local Flood Authority is happy with the proposals subject to conditions on SUDS and water efficiency. Given the above, the proposed measures are considered acceptable in terms of flood risk.

## **20 FIRE SAFETY**

- 20.1 Policy D12 of the London Plan also requires the application to be accompanied by a fire statement, prepared by a suitably qualified third-party assessor. London Plan Policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users.
- 20.2 A Fire Statement has been submitted as part of the application, which demonstrates the ability to comply with Building Regulations. This statement has been prepared and approved by a suitably qualified consultant and addresses the requirements of London Plan policy D12(B). An Automatic Fire Suppression System, fire resistant materials, structural fire resistance, compartmentation and smoke ventilation measures would be employed. A condition is attached ensuring compliance with the submitted Fire Statement.
- 20.3 The floor of the highest level of residential accommodation is less than 18m from ground level and therefore the application is not referable to the Health and Safety Executive and one stair and lift core is sufficient.

## **21 TRANSPORT**

21.1 The following transport considerations are covered below:

- Policy review
- Site location and access to public transport
- Trip generation
- Travel planning
- Access and permeability
- Cycle parking
- Car parking and vehicle access
- Construction management
- Deliveries and servicing
- Highway works
- Pedestrian, Cycling and Environmental Improvements

- Cycle hire improvements
- Conclusion

#### Policy review

- 21.2 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new developments in the borough to be car-free.
- 21.3 Policy T3 sets out how the Council will seek improvements to transport infrastructure in the borough. Policy T4 addresses how the Council will promote the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.
- 21.4 [Camden's Transport Strategy](#) (CTS) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets our objectives, policies, and measures for achieving this goal.
- 21.5 The Council's priorities include:
- increasing walking and cycling
  - improving public transport in the Borough
  - reducing car ownership and use
  - improving the quality of our air
  - making our streets and transport networks safe, accessible, and inclusive for all
- 21.6 In 2022, the Council reviewed its progress so far on the CTS and also set out our delivery plan for the period covering 2022/23 - 2024/25. This was presented to [Cabinet on 14<sup>th</sup> December 2022](#). The plan includes commitments, all of which are pertinent to this application, and which will be expanded upon in later sections, to:
- i. implement proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists via the Holborn Liveable Neighbourhood (HLN) scheme.
  - ii. continue to expand our dockless bike and e-scooter hire network, and
  - iii. expand significantly our Electric Vehicle Charging Point network.
- 21.7 Camden's [Clean Air Action Plan](#) and [Climate Action Plan](#) also contain policies which are relevant to our transport observations.
- 21.8 London Plan policies on transport of relevance include:
- Policy T1 (Strategic approach to transport)
  - Policy T2 (Healthy Streets)
  - Policy T3 (Transport capacity, connectivity, and safeguarding)
  - Policy T4 (Assessing and mitigating transport impacts)
  - Policy T5 (Cycling)
  - Policy T6 (Car parking)
  - Policy T7 (Deliveries, servicing, and construction)
  - Policy T9 (Funding transport infrastructure through planning)

- 21.9 London Plan Policy T1 (Strategic approach to transport) states that Development Plans should support, and development proposals should facilitate, the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle, or public transport by 2041.
- 21.10 London Plan Policy T1 also states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Site location and access to public transport

- 21.11 The site is located in the Central London Area and is bounded by Museum Street to the east, High Holborn to the south, and New Oxford Street to the north, with West Central Street running through the middle of the site. High Holborn and New Oxford Street form part of the Strategic Road Network (SRN). The Council is the highway authority for these roads and is therefore responsible for their maintenance. However, TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. It is noted that TfL Spatial Planning have submitted observations on the transport implications of the planning application.
- 21.12 The site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). Holborn (London Underground) and Tottenham Court Road (London Underground and Elizabeth Line) stations are located approximately 350 metres east and 470 metres west of the site (circa 5-10 minute walk). Other London Underground stations are also located nearby, including Covent Garden which is located 660 metres to the southwest. In addition, bus stops serving various bus routes are located nearby on Bloomsbury Street, Great Russell Street, Kingsway, and New Oxford Street.
- 21.13 The site is located in close proximity to segregated cycles lanes and tracks on Gower Street, Bloomsbury Street, and (under development) on Shaftesbury Avenue. The site is easily accessible to cyclists using these roads which run from Euston in the north to Covent Garden in the south.
- 21.14 The site is also located in close proximity to what was known as cycle route Q1 (Quietway), which follows Bury Place (crossing Bloomsbury Way), New Oxford Street (part), High Holborn (part), and Newton Street. The route provides a connection with high quality cycle facilities in places between Camden Square in the northeast of the Borough and Covent Garden in the south of the Borough. The site is easily accessible to cyclists using that quiet cycle route.
- 21.15 High Holborn and New Oxford Street form part of the proposed primary cycle route network in the borough (see Camden's Cycling Action Plan – April 2019). Cyclists and pedestrians make up a considerable proportion of the traffic in the vicinity of the site, particularly during peak periods.
- 21.16 The Council is developing proposals which will transform the public realm in the area and make many streets more attractive to pedestrians and cyclists. Under Objective 1 of the CTS, which is to "transform our streets and places to enable an increase in walking and cycling", the Council has set out "investment priority" schemes – these

being schemes which *“identify priorities for this objective where we will require substantial additional funds, including inward investment & partnership in delivery from TfL/ other relevant organisations, in the short to medium term, to help realise these overall goals.”* One of those investment priorities is *“Unravelling the Holborn gyratories and reducing traffic dominance as part of an area wide ‘Liveable Neighbourhood’ project that enables active travel modes”*.

- 21.17 The Council will therefore seek to secure financial contributions towards the overall scheme costs from development funding. Indeed, a contribution from this particular development is discussed later in this section of the report. Construction of the HLN scheme will take place as funds become available. Implementation of some changes to roads in the area are likely to start in 2024 using secured funding, with each subsequent phase of construction subject to financial approval as funding becomes available.
- 21.18 The site is conveniently located near various Santander cycle hire docking stations including one directly adjacent to the site on High Holborn. The Santander cycle hire scheme provides easy access to bicycles for short journeys. Residents, staff, and visitors will be able to hire a bicycle for the price of £1.65 for 30 minutes or unlimited journeys for £120 annual membership and the bicycle could be returned to any Santander cycle hire docking station in London.
- 21.19 A number of dedicated parking bays for dockless rental e-bikes and rental e-scooters exist in the area, within a 5 minute walk of the site. However, none of these bays are in particularly close proximity to the site. The Council has plans to expand the network of bays in the area and it is hoped that some bays could, subject to feasibility and consultation, be provided in close proximity to the site in the future.

#### Trip generation

- 21.20 The proposals would create an additional 24,158 square metres of office floorspace, 1,667 square metres of retail floorspace, and 44 residential dwellings. A Transport Assessment (TA) has been prepared and submitted in accordance with TfL Healthy Streets guidance which seeks to promote healthy and active lifestyles. The TA includes details of trip generation analysis for the proposed development.
- 21.21 Officers anticipate significant numbers of walking and cycling trips to and from the site. There is potential for many of the walking trips to be made from the rail stations at Holborn, Tottenham Court Road, Covent Garden, and Russell Square. The Healthy Streets Assessment undertaken as part of the Transport Assessment makes a number of recommendations as to how these walking routes could be improved. This includes:
- Provide cycle lanes along Woburn Place to protect cyclists from the high volume of traffic.
  - Improve pedestrian crossings at the junction of Euston Road and Upper Woburn Place considering large volumes of pedestrians.
  - Improve pedestrian crossings and cycling facilities at the junction of Theobalds Row, Southampton Row, and Vernon Place.
  - Improve cycle route markings at the junction of High Holborn and Newton Street (particularly in the southbound direction where the route crosses High Holborn).

21.22 The Council would like to implement these recommendations in order to improve the walking experience to and from the site, subject to consultation where necessary and funding. In addition, the Council intends to make further improvements to the primary cycle route network, including High Holborn and Theobald’s Road.

21.23 Table 39 of the TA summarises the predicted trip generation for each mode of transport for the proposed development, including servicing trips. This is represented below.

Mode	AM peak hour (08:00 – 09:00)			PM peak hour (17:00 – 18:00)		
	In	Out	Total	In	Out	Total
Underground, metro, light rail or tram	228	13	241	15	233	248
National Rail	207	9	216	10	209	219
Elizabeth line	84	10	94	16	96	112
Bus, minibus or coach	89	12	101	20	104	124
Taxi	2	0	2	0	2	2
Motorcycle, scooter or moped	9	0	9	0	9	9
Driving a car or van	0	0	0	0	0	0
Passenger in a car or van	3	0	3	0	3	3
Bicycle	84	9	93	15	96	111
On foot	62	35	97	16	96	112
<b>Total</b>	<b>767</b>	<b>89</b>	<b>856</b>	<b>144</b>	<b>871</b>	<b>1,014</b>

Note that figures may not sum due to rounding

Figure 43. Trip generation by mode

21.24 The proposed development is expected to generate an additional 1,870 trips across the day, which represents a significant increase. The majority of the additional trips will be by public transport, with a considerable percentage (20.4%) to be made using active travel modes.

Travel planning

21.25 A draft travel plan has been submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport.

21.26 A travel plan covering all proposed uses and an associated monitoring and measures contribution of £11,221 would be secured by section 106 legal agreement. The Travel Plan would be targeted towards staff and visitors. The location of the site with excellent connections to the public transport network will help to reduce the need to travel by single occupancy private car and will encourage staff and visitors



to make walking, cycling and travel by public transport the natural choice for day-to-day trips to and from the site.

#### Access and permeability

- 21.27 The site currently has vehicular accesses to an existing multi-storey car park from Museum Street and West Central Street. These would be removed as part of the proposals.
- 21.28 The proposals require a new vehicular access to be constructed by the Council on High Holborn and is discussed in the section on highway works. This would provide access to an on-site servicing yard at basement level which will be reached via a vehicle lift.
- 21.29 The proposals would create new buildings with frontages and pedestrian accesses on High Holborn, Museum Street, Vine Lane, and West Central Street. Proposals for access to on-site cycle parking stores are discussed in the cycle parking section below.
- 21.30 The proposals include a new step-free pedestrian route through the site, to be named Vine Lane. This would open up access to the site from High Holborn and New Oxford Street (and West Central Street). It would also create new public realm within the site boundary including areas for seating and soft landscaping which will be privately maintained. A public realm management plan for Vine Lane would be secured by Section 106.

#### Cycle parking

- 21.31 The Council requires high quality cycle parking facilities to be provided for staff and residents (long stay) and visitors (short stay) in accordance with Local Plan Policy T1, London Plan Policy T5 (Cycling), CPG Transport, and the London Cycling Design Standards (LCDS).
- 21.32 Tables 10 and 11 of the TA summarise the number of cycle parking spaces to be provided for the various land uses across the site. These are represented below.

**Table 10: Cycle parking provision – Museum Street / Vine Lane / High Holborn Buildings**

Land Use		Floorspace / Dwellings	London Plan Land Use Type for the Purposes of Cycle Parking Calculations	Long-Stay Spaces (required / provided)	Short-Stay Spaces (required)
E (Flexible)	Town centre uses (Retail / Café / Workspace)	1,027sqm (GEA)	A2-A5	6	26*
E(g)(i)	Business Offices	25,824sqm (GEA)	B1	345	15
C3	Dwellings	1 bed 2 person	C3	28	2
		2+ bed		4	
<b>Total</b>				<b>387</b>	<b>43</b>

\*Reduced by 50% compared with *London Plan* (2021) standards, to take account of planning flexibility and public realm objectives

**Table 11: Cycle parking provision - West Central Street**

Land Use		Floorspace / Dwellings	London Plan Land Use Type for the Purposes of Cycle Parking Calculations	Long-Stay Spaces	Short-Stay Spaces
E (Flexible)	Town centre uses (Retail / Café / Workspace)	780sqm (GEA)	A2 - A5	5	20*
C3	Dwellings	1 bed 2 person	C3	15	2
		2+ bed		11	
<b>Total</b>				<b>42</b>	<b>22</b>

\*Reduced by 50% compared with *London Plan* (2021) standards to take account of planning flexibility and public realm objectives

*Figure 44. Tables showing cycle parking provision*

- 21.33 Cycle parking for the Museum Street office block would be provided at basement level with a total of 345 spaces to be provided. A variety of types of cycle parking are being provided including 2-tier racks, Sheffield stands, and Brompton lockers. There is space and provision for parking for cyclists with disabilities. The cycle parking will be accessed from an entrance on West Central Street via a dedicated lift and stairs with a wheeling ramp.
- 21.34 The proposals for the office block also include the provision of changing facilities, 345 lockers and 21 showers at basement level which would help to encourage staff to commute by bike.
- 21.35 Cycle parking for the West Central Street residential block would be provided at ground floor level. A dedicated cycle store would contain 37 spaces. Access to the cycle store will be provided via the residential entrance lobby located on West Central Street or via a Back of House route from Museum Street.
- 21.36 Cycle parking for the High Holborn residential block would be provided at ground floor level. A dedicated cycle store would contain 8 spaces. Access to the cycle store would be provided via a separate entrance on Vine Lane.

- 21.37 Cycle parking for the Vine Lane residential block would be provided at ground floor level. A dedicated cycle store would contain 28 spaces. Access to the cycle store will be provided via the residential entrance lobby located on Vine Lane.
- 21.38 A total of 11 long stay cycle parking spaces would be provided for the retail properties at various locations across the site.
- 21.39 The proposal also includes the provision of 36 short stay cycle parking spaces for visitors. Sheffield stands (or similar) would be provided at various locations adjacent to the site, including 7 on High Holborn (14 spaces), 7 on Museum Street (14 spaces), and 4 on New Oxford Street (8 spaces). These cycle parking spaces would be delivered as part of a package of highway works to be funded by the developer and undertaken by the Council's highways contractor on completion of the development. A plan showing indicative locations of 18 Sheffield stands (or similar) should be provided as an annex to the legal agreement if planning permission is granted.
- 21.40 The number of short stay cycle parking spaces proposed is 29 less than the London Plan minimum requirement of 65. Officers acknowledge the need to maximise the availability of public realm within the site (Vine Lane) for pedestrian movement, seating, planting, and tables and chairs adjacent to retail units. It has therefore been agreed that the Council would secure an off-site cycle parking contribution of £5,000 by legal agreement in accordance with Local Plan Policy T1 if planning permission is granted. This would allow the Council to consider potential locations and provide a further 15 Sheffield stands (or similar) on the public highway in the general vicinity of the site.
- 21.41 Overall, the number of cycle parking spaces to be provided both on and off-site meets the minimum requirements of the London Plan, which is welcomed. A variety of types of cycle parking are being provided including 2-tier racks, Sheffield stands, and Brompton lockers. The type of facilities to be provided are generally in accordance with CPG Transport and LCDS guidance. The cycle parking proposals are acceptable.

#### Car parking and vehicle access

- 21.42 The site is located in controlled parking zone CA-C (Holborn and Covent Garden) which operates from 0830 to 1830 hours on Monday to Friday, and from 0830 to 1830 hours on Saturday for pay by phone parking bays and single yellow lines. Resident permit holder parking bays operate 24 hours per day, 7 days per week.
- 21.43 A publicly accessible multi-storey car park is located within the site. This is accessed from Museum Street and has 228 parking spaces. The proposals include the removal of the car park and all 228 parking spaces. This is welcomed as it would help to reduce motor vehicle trips in the vicinity of the site and result in a more effective use of land in this highly accessible location, in accordance with Local Plan Policy T2.
- 21.44 The site would not have any on-site car parking provision. The London Plan Policy T6 (Car parking) has a requirement for at least 1 disabled parking space to be provided for the office space. The site has excellent links to nearby public transport facilities. However, there is a lack of step free access at nearby stations except

Tottenham Court Road. One disabled parking space would be provided on-street and a contribution of £3,500 would be secured for this via section 106.

- 21.45 The proposal includes the provision of 3 dedicated loading bays in an on-site servicing yard at basement level, which would be accessed from High Holborn via a vehicle lift. These are considered to be essential for operational purposes and would minimise the impact of deliveries and other servicing activity on the public highway. In the event of the lift breaking down, it is proposed that deliveries would temporarily take place from the existing Museum Street loading bay and from West Central Street whilst maintenance and repair arrangements made with the lift manufacturer. London Plan Policy T6 (Car Parking) states that where car parking is provided in new developments, provision should be made for infrastructure for electric or other ultra-low emission vehicles. No electric vehicle charging infrastructure is proposed on-site as there is no parking in the servicing yard.
- 21.46 Officers expect the large majority of visitors to travel to the site by sustainable modes of transport.
- 21.47 The development would be secured as car-free by legal agreement in accordance with Local Plan Policy T2 if planning permission is granted.

#### Construction management

- 21.48 Construction management plans are used to demonstrate how developments would minimise impacts from the movement of goods and materials during the construction process (including any demolition works). A draft demolition management plan (DMP) and a draft construction management plan (CMP) using the Council's CMP pro-forma has been submitted in support of the planning application. However, the documents lack detail as principal contractors are yet to be appointed for the demolition and construction stages of the development.
- 21.49 The total construction period would be circa 4 years.
- 21.50 The site is located on the strategic road network and strategic cycle route network. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday. Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc.). The Council needs to ensure that the development could be implemented without being unacceptably detrimental to amenity or the safe and efficient operation of the highway network in the local area. More detailed DMP and CMP documents would therefore be secured by legal agreement in accordance with Local Plan Policy A1.
- 21.51 The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. The contractor would need to register the works with the Considerate Constructors' Scheme. The contractor would also need to adhere to the CLOCS standard for Construction Logistics and Community Safety.

- 21.52 The development would require significant input from officers at demolition and construction stage. This would relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the DMP and CMP during demolition and construction.
- 21.53 Implementation support contributions of £29,943 and impact bonds of £31,497 for the demolition and construction phases of the development works would be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission were granted. The DMP bond contribution would be paid on implementation of the demolition and when the CMP were to be implemented no additional money would need to be paid unless the Council had drawn from it, in which case it would just be a top up required to £31,497.
- 21.54 A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction would also be secured by legal agreement.

#### Deliveries and servicing

- 21.55 The site is located on the strategic road network and strategic cycle route network. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday.
- 21.56 Deliveries, refuse collections, and other servicing activities for the various buildings at the site currently takes place from an informal loading bay on Museum Street. Loading and unloading is not permitted on High Holborn.
- 21.57 The proposals include the provision of an on-site servicing yard at basement level which would be accessed via a vehicle lift from High Holborn. This would require a new vehicular access to be constructed by the Council and is discussed in the section on highway works. Swept path diagrams indicate that the various types of vehicles likely to use the servicing yard would be able to enter and exit the vehicle lift in a forward gear. This is welcomed as it would help to reduce conflicts between servicing vehicles and other road users, particularly pedestrians and cyclists.
- 21.58 Refuse collections for the proposed buildings would take place directly from the public highway on Museum Street, Grape Street, and West Central Street. This would cause minimal disruption to general traffic operations in the vicinity of the site.
- 21.59 The TA estimates that the development would generate 70 daily delivery and servicing trips to the site. The majority of these trips would occur outside of peak periods and would be facilitated in the on-site servicing yard which would have 3 dedicated loading bays. It is estimated that these loading bays would collectively be able to accommodate at least 9 deliveries per hour, with most deliveries taking less than 20 minutes.
- 21.60 A small proportion of daily deliveries would take place from loading bays on Shaftesbury Avenue (the northern section that now leads into Grape Street) and Museum Street (e.g., for the residential units in the West Central Street building). The Museum Street loading bay could also be used at times when the 3 loading bays in the servicing yard were already fully occupied.

21.61 A draft Delivery and Servicing Plan (DSP) has been submitted in support of the planning application. This is welcomed as it demonstrates that issues related to delivery and servicing movements have been considered at an early stage. The DSP sets out to meet the following objectives:

- To identify the expected number of delivery and servicing trips associated with the proposed development;
- To demonstrate that goods and services can be delivered, and waste removed, in a safe and efficient manner;
- To identify ways to reduce delivery numbers, employ out of hours deliveries and consolidate goods wherever possible;
- To ensure delivery activities do not hinder the flow of traffic on the public highway or obstruct pedestrian routes;
- To minimise vehicles waiting or parking at loading areas so that there is a continuous availability for approaching vehicles;
- To provide design guidance for accommodating service and delivery vehicles; and
- To provide design guidance for waste storage and refuse collection vehicles.

21.62 A more detailed DSP would be secured by legal agreement. This would help to ensure that any operational impacts associated with delivery and servicing movements could be mitigated. The DSP would be reviewed annually over a 5-year period by the travel plan coordinator for the site. This would allow site occupiers to demonstrate compliance with the DSP while managing a regime of continual improvement.

#### Highway works

21.63 The public highway adjacent to the site on High Holborn, Museum Street, New Oxford Street, and West Central Street could potentially sustain considerable damage as a direct result of construction traffic travelling to and from the site during the demolition and construction phases of the proposed works.

21.64 Various amendments to existing traffic management orders have been proposed. This includes the introduction of timed traffic restrictions for West Central Street (e.g., No motor vehicles between 0800 and 1800 hours). This would need further consideration if planning permission is granted as West Central Street provides access to properties on Grape Street and Shaftesbury Avenue (Princes Circus) to the west of the site.

21.65 The Council would need to construct a new vehicle access adjacent to the High Holborn frontage of the new building at 1 Museum Street. This would provide vehicular access to the proposed on-site servicing yard. The Highways contribution would cover the cost of this. This would similarly be covered by the Highways contribution.

21.66 The Council would also need to install 'Sheffield' stands (or similar) on the footways adjacent to or near the site to provide for visitor cycle parking requirements that cannot be accommodated within the site boundary.

21.67 The applicant has submitted indicative proposals for improving the public realm significantly on West Central Street. This would involve repaving the carriageway

and footways on West Central Street in high quality materials, similar to those used earlier in 2023 on the northern end of Shaftesbury Avenue between New Oxford Street and Grape Street. The Pedestrian, Cyclist and Environmental contribution would cover the cost of this.

21.68 The Council would need to repair any damage to the public highway on completion of the proposed development. A highways contribution of £209,700 would be secured by legal agreement in accordance with Local Plan Policy A1 if planning permission is granted. The highway works would be implemented by the Council's highways contractor on completion of the development. The highway works would include where necessary:

- Construction of a new vehicular crossover on High Holborn to provide access to the on-site servicing yard.
- Removal of redundant vehicular crossovers on Museum Street and West Central Street.
- Repaving the footways directly adjacent to the site on High Holborn and Museum Street.
- Repaving the carriageway and footways on West Central Street in high quality materials, similar to those used earlier in 2023 on the northern end of Shaftesbury Avenue between New Oxford Street and Grape Street.
- Amendments to existing traffic management orders on West Central Street.
- Installation of 18 Sheffield stands (or similar) directly adjacent to the site on High Holborn (7), Museum Street (7), and New Oxford Street (4).
- Any other works the Council acting reasonably requires as a direct result of the Development.

#### Pedestrian, cycling and environmental improvements

21.69 The proposed development would generate an increase in multi-modal trips to and from the site on a daily basis. The Council's transport policies are geared towards encouraging and promoting active travel (i.e., walking and cycling). The Council therefore seeks to secure a Pedestrian, Cycling and Environmental (PCE) improvements contribution by legal agreement if planning permission were approved in principle. This would be used by the Council alongside similar contributions secured from other major developments to transform the public realm in the local area for the benefit of cyclists and pedestrians, and to improve road safety for all road users in and around the site. The focus would be on improving conditions for walking and cycling on routes between the site and nearby transport interchanges, namely Holborn and Tottenham Court Road stations.

21.70 As mentioned previously, the Council has developed proposals to improve the public realm, introduce traffic management changes and cycling and walking improvements and Healthy Street upgrades across the Holborn area. These improvements would be delivered via the Holborn Liveable Neighbourhood scheme. Improvements to be delivered include:

- Public realm improvements on Museum Street between High Holborn and New Oxford Street to complement the development public realm proposals including pavement widening and reducing the road to one lane of traffic.
- Public realm improvements on the section of High Holborn between Kingsway and Shaftesbury Avenue including new and improved pedestrian crossings at

the junctions with Drury Lane/Museum Street, Southampton Place, and Kingsway.

- Public realm improvements on the section of New Oxford Street between High Holborn and Museum Street including part pedestrianisation and timed road closure traffic restrictions, and junction improvements at High Holborn and New Oxford Street.
- Public realm improvements on New Oxford Street at the junction with Bloomsbury Way including pavement widening on the south side of New Oxford Street.
- Public realm improvements on Drury Lane between Great Queen Street and High Holborn including green infrastructure improvements.
- Public realm improvements on Museum Street between Bloomsbury Way and Great Russell Street including timed road closure traffic restrictions and Opportunities for new and enhanced public spaces.

21.71 A sizeable portion of the PCE improvements contribution would be used for the above improvements and to upgrade existing urban greening facilities in the area.

21.72 The Holborn Liveable Neighbourhood scheme has a TfL Prioritisation Rating of 'Very High.' The scheme also features as 'High Priority' on our hexcell mapping of priority locations in the Borough for transport projects, based on a combination of indicators including air quality, road safety, walking and cycling potential, and the area itself is one of the busiest in London in terms of cycle journeys, requiring high quality, safe, protected cycle lanes alongside wider Healthy Streets improvements. The proposed improvements (subject to consultations and statutory processes), once implemented, would make it easier and safer for pedestrians and cyclists to travel to and from the property. As noted previously, the Holborn LN is a "priority" investment project within the Camden Transport Strategy. A low-emission transport project in Holborn is also listed as a priority scheme within the Climate Action Plan.

21.73 A pedestrian, cycling, and environmental improvements contribution of £1,200,000 would be secured by legal agreement if planning permission were to be approved in principle.

#### Cycle hire improvements

21.74 The proposal to introduce a new vehicular access to the new building known as 1 Museum Street on High Holborn would require a slight relocation of the existing Santander cycle hire docking station infrastructure on High Holborn. The principle of a slight relocation and redistribution of cycle docking points has been discussed and agreed in principle with TfL.

21.75 The proposed relocation and redistribution of the Santander cycle hire docking station infrastructure could be facilitated via a planning obligation requiring the developer to work directly with TfL. This would require the developer to fully cover TfL's costs in preparing a planning application (if necessary) and the costs associated with relocating the docking station to a new location. Officers would need to be involved in the scoping out of potential locations for the docking station if it needs to be moved from its current location. The cost of this would be covered by the Highways contribution.



21.76 A number of dedicated parking bays for dockless rental e-bikes and rental e-scooters exist in the area, within a 5 minute walk of the site. However, none of these bays are in particularly close proximity to the site. The existing bays merely provide capacity for existing usage by residents and people who work in or visit the area. The Council has plans to expand the network of bays in the area and it is expected that some bays could, subject to feasibility and consultation, be provided in closer proximity to the site, along with build-outs/greening which we typically incorporate where feasible as part of each bay location

21.77 Officers anticipate significant demand for more dedicated parking bays to be provided in the area should planning permission be granted. A cycle/e-scooter hire parking contribution of £15,000 would therefore be secured by legal agreement. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by bus.

### Conclusion

21.78 The proposals are acceptable in terms of transport implications subject to some conditions including the provision and ongoing retention of cycle parking facilities and the following planning obligations being secured by legal agreement:

- Travel plan and associated monitoring and measures contribution of £11,221.
- Off-site cycle parking contribution of £5,000
- On-street disabled parking space (£3,500).
- Car-free development.
- Demolition management plan (DMP), DMP implementation support contribution of £29,943, and DMP Impact Bond of £31,497.
- Construction management plan (CMP), CMP implementation support contribution of £29,943, and CMP Impact Bond of £31,497.
- Requirement to form a construction working group consisting of representatives from the local community.
- Delivery servicing plan.
- Highways contribution of £209,700.
- Level plans (See CPG8 paragraph 5.8)
- Pedestrian, Cycling and Environmental Improvements contribution £1,200,000.
- Highways agreement with TfL via Section 278 of the Highways Act 1980 in respect to any relocation or redistribution of the Santander cycle hire docking station on High Holborn.
- Cycle/e-scooter hire parking contribution of £15,000
- Public Realm Management Plan
- Legible London signage contribution of £20,000.

## **22 SAFETY AND SECURITY**

22.1 Camden Local Plan policy C5 and CPG1 (Design) are relevant with regards to secure by design.

- 22.2 The Designing Out Crime officer was consulted prior to the application being submitted and was involved in the design process. This officer raised no objections to the proposals. The proposed design would incorporate natural surveillance and would not provide spaces that encourage/allow anti-social behaviour.
- 22.3 The site is currently dominated by dead frontages and suffers from anti social behaviour. The hotel, flats and car park in Selkirk House are unoccupied, as is much of the floorspace in the West Central Street block. Active frontage is proposed along West Central Street, Museum Street and High Holborn. The proposals would encourage pedestrian movement through the area, increasing natural surveillance and discouraging anti-social behaviour. The proposed uses on the site, especially residential, would also provide natural surveillance during the day and at night.
- 22.4 The proposal features a new pedestrian and cyclist route, linking West Central Street directly to High Holborn. Increasing permeability encourages natural surveillance and discourages anti-social behaviour. Council officers have been in discussion with the applicant over whether the new passageway should be gated at night. Some local residents have raised concerns regarding the passageway being open at night. It is recognised that this route could attract anti-social behaviour, however, it is considered better for the route to be open than to close gates. The proposed through-route has been designed to be straight and therefore offers no hiding places. Given the above, officers consider that it is preferable for the route to remain open. However, a section 106 head of term is attached, ensuring that the situation is monitored and should the new lane being open at night give rise to anti-social behaviour then gating this route at night could be reconsidered. The location of gates has been designed into the scheme from the outset to accommodate this possibility. The scheme has been designed in accordance with Secure by Design principles.

## **23 REFUSE AND RECYCLING**

- 23.1 Policy CC5 and Camden Planning Guidance Design are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.
- 23.2 Servicing would take place on site and there would be a dedicated servicing area in the basement of the Museum Street block, which would be accessed via a lift from High Holborn. Commercial waste and recycling would be stored at basement level. Residential waste would be stored in individual dwellings and brought down for collection. The proposed refuse and recycling areas are sufficient for the proposed quantum of both commercial and residential floorspace.
- 23.3 A condition would ensure the refuse storage was ready for prior to occupation of the residential units.

## **24 PLANNING OBLIGATIONS**

- 24.1 The following contributions are required to mitigate the impact of the development upon the local area, including on local services. These heads of terms would mitigate any impact of the proposal on the infrastructure of the area.

<b>Contribution</b>	<b>Amount (£)</b>
Affordable housing	N/A
Deferred Affordable Housing Contribution (DAHC) - Review	N/A at present (full amount payable £1,950,000)
Retention of architect	N/A
Car free	N/A
Pedestrian, cycling and environmental contributions	1,200,000
Highways contribution	209,700
Off-site cycle contribution	5,000
Provision of on-street disabled parking bay	3,500
Cycle hire/e-scooter contributions	15,000
DMP	N/A
DMP monitoring fee	29,943
DMP bond	31,497
CMP	N/A
CMP monitoring fee	29,943
CMP bond	31,497
Delivery and Servicing Plan	N/A
Travel Plan	N/A
Travel Plan Monitoring and Measures Contribution	11,221
Energy and sustainability	N/A
Future proofing to link to a district heating network	N/A
Carbon off-set fund	183,540
Apprenticeships	1,700 x 65 apprentices = 110,500
Employment and training contribution	111,531
Construction apprenticeships and work placement opportunities through the King's Cross Construction Skills Centre	N/A
Local employment	N/A
Local Procurement	N/A
Work apprenticeships	N/A
Flexible Use Ancillary Workspace Marketing Plan	N/A
Public Realm Management Plan & Vine Lane Gating Strategy	N/A
Legible London signage	20,000
Tree planting on public highway	tbc
Basement Construction Plan	N/A
<b>TOTAL</b>	<b>1,931,432 (excluding DAHC Review)</b>

## 25 MAYOR OF LONDON'S CROSSRAIL CIL

Area	Retained	Relief	Liabe	Schedule / Rate	IP:IC	Total Relief	Total Charge
22650.00	0.00	0.00	22650.00	MCIL2 Office - £185.00	355:330	£0.00	£4,507,693.18
			22650.00	CCIL2 Office Research Development - Zone A - £110.00	355:334	£0.00	£2,648,151.20
1547.00	0.00	0.00	1547.00	MCIL2 Retail - £165.00	355:330	£0.00	£274,592.50
			1547.00	CCIL2 Other Commercial Uses - Zones A, B, C - £32.00	355:334	£0.00	£52,616.53
4502.00	0.00	0.00	4502.00	MCIL2 Band 1 - £80.00	355:330	£0.00	£387,444.85
			4502.00	CCIL2 Residential GTR & EQ 10 - Zone A - £193.00	355:334	£0.00	£923,516.56

- 25.1 This calculation has had a decision date set as today and is based on the information provided (without any deductions.)
- 25.2 Prior to applying these to the calculation the applicant will need to provide completed forms for relief along with any supporting evidence.
- 25.3 The above is an estimate only and would be subject to the verification of the proposed floor area and calculations by the Council's CIL team.
- 25.4 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) as it includes the addition of private residential units. This would be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index.

## 26 CAMDEN CIL

- 26.1 The proposal would be liable for the Camden Community Infrastructure Levy (CIL).

## 27 CONCLUSION – PLANNING APPLICATION

- 27.1 The proposed development would involve substantial demolition of the existing buildings on the site, 75% of Selkirk House would be removed as would the entirety of 16a and 18 West Central Street which are non-designated heritage assets. Development plan policies are clear that where proposals include substantial demolition that consideration must be given to the retention and re-use of those buildings. This was one of the key issues with the recent application for demolition of M&S on Oxford Street. The Secretary of State in deciding that case stated that the evidence was not sufficient to conclude whether there was a viable and deliverable alternative, the suggestion was that the alternatives to demolition had not been thoroughly explored. The loss of the buildings and the failure to reuse existing resources was given moderate weight in the decision making (the Secretary of State having concluded that there was conflict with the design and heritage policies and given the importance of these policies to determination of the case that the proposal was in conflict was with the development plan as a whole). The Secretary of State concluded that there were not material considerations which indicated that the scheme should still be supported.

- 27.2 Turning to the application in front of us, the planning application is for redevelopment of a brownfield site in a highly accessible location which is located in a designated growth area. It is the type of site identified in development plan policies as set out in the Local Plan and London Plan, which should be the focus of meeting the objective of creating sustainable mixed-use places that make the best use of land. The NPPF also supports making the effective use of brownfield land.
- 27.3 Selkirk House is a building of poor architectural quality. The public realm around the building is also of poor quality, featuring much hardstanding and no active frontages. The buildings which form part of West Central Street make a positive contribution to the conservation area and in the case of 10 and 11-12 Museum Street and 35 and 37 New Oxford Street are nationally listed buildings.
- 27.4 The applicant has provided a report as part of the application which explores the potential options for reuse of the existing buildings. This report has been reviewed by Hilson Moran who were appointed by the Council as a third party independent assessor. Hilson Moran were also asked to consider and comment on the report of Simon Sturgis who was appointed by local groups to review the submission. It is accepted that Hilson Moran question whether there might be the potential to convert floors 4 to 13 of the tower to residential, but in all other respects they accept the arguments which have made in support of demolition of the floors below which accommodate the car park and 16a and 18 West Central Street.
- 27.5 Development Plan policies do not state that all buildings must be retained and no demolition is accepted, they require us to consider the options for reuse to help inform whether demolition is acceptable. Officers are satisfied that the options for reuse have been properly explored. Officers accept that it would be difficult to repurpose the car park which provides the base to the building and it would require substantial works to bring the building up to modern hotel standards or to convert it all to residential, especially in terms of fire safety. Retention of floors 4-13 for conversion whilst demolishing the podium might well be an option, but a potentially impractical and expensive one.
- 27.6 Aside from the points above, demolition of the building allows for the most efficient use of the land and will allow for delivery on other significant development plan policies. Officers are satisfied that the principle of demolition of the buildings in sustainability terms does not result in a conflict with the development plan.
- 27.7 The proposed development would deliver a mix of uses in this Central London location including a significant quantum of employment space with associated employment and training benefits and new homes, including affordable homes. Whilst the proposal would result in the loss of a hotel this is accepted taking account of the existing supply of visitor accommodation, occupancy rates and pipeline. The loss of the multi-storey car park will provide many benefits to the area discouraging use of private motor vehicles, reducing air pollution and improving the health of people living and working in the area, as well as townscape benefits. It is accepted that proposal fails to meet the requirements of policy H2 in that it does not provide the full amount of residential accommodation to match the commercial uplift, the shortfall being 29% of the target. Officers accept that it would be challenging in terms of design, heritage and amenity to incorporate additional residential on the site and

feel that the scheme strikes a reasonable balance in terms of supporting growth of the commercial sector and providing new housing. Furthermore, the failure to provide the full quantum of housing needs to be balanced against the full provision of affordable housing against policy.

- 27.8 In Section 7 of the report it was set out that because of the results of the Housing Delivery Test and the fact that the Council cannot demonstrate that it has a 5 year housing land supply (after taking account of the required buffer and past under-delivery) Para 11 'the tilted balance' of the NPPF is engaged which sets a presumption in favour of granting the development which would deliver more housing. This is an important consideration in the planning balance (something that was not relevant to the M&S decision). It does not mean that the delivery of housing trumps all other planning issues, as is set out there remain instances where the adverse impacts of a development might disengage the tilted balance. The first relates to the impact on heritage assets and the second the adverse impacts of a development when compared to the benefits, both are dealt with below.
- 27.9 Section 10 identifies heritage assets both on the site and surrounding it, it considers the significance of those assets and the impact of the proposed development on them. It is considered that the proposed works to the West Central Street block would dilute the balanced composition of this part of Bloomsbury causing mid-range less than substantial harm to the significance of the conservation area and lower to mid-range harm to the individual listed buildings within it. Demolition of 16a and 18 West Central Street (non-designated heritage assets) would also result in less than substantial harm, at the middle end of the scale to the conservation area. The proposed building introduces additional height on the site and that has also been identified as something which would cause less than substantial harm to multiple designated heritage assets, ranging from the lower end of the scale in regards some listed buildings, to the middle end of the scale in regards the impact on the conservation area.
- 27.10 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and clear and convincing justification for the harm is required. The applicant has sought to mitigate harm as far as possible, this scheme having evolved from an earlier proposal where the tower was higher and there were more significant works to the West Central Street block. However, less than substantial harm has been identified (at the middle end of the scale) to the significance of designated and non-designated heritage assets. In this respect there is conflict with development plan Policy D2 of the Local Plan and HC1 of the London Plan, although as set out above and below officers do not consider that the proposal is in conflict with the development plan as a whole.
- 27.11 Paragraph 202 of the NPPF states that less than substantial harm to a designated heritage asset should be weighed against the public benefits of the proposals in reaching a decision. Paragraph 203 states that the impact on a non-designated heritage asset should be taken into account in determining the application and requires a balanced judgement.

27.12 The proposed development would deliver substantial economic, environmental and social benefits which would deliver on many of the objectives of the Local Plan and London Plan.

- New employment space in a highly accessible Central London location, an area designated for growth. An employment and training package including apprenticeships and the provision of affordable retail space would provide new job opportunities for local people and businesses.
- 44 good quality homes in a location easy to get to and from on foot, by bike and public transport and with good access to local amenities. 19 of these homes being secured as affordable accommodation in accordance with the criteria and definitions set by Camden.
- The removal of a vacant building of low architectural quality and the provision of high quality architecture in its place as well as on West Central Street, the new Vine Lane route and High Holborn.
- The proposal would significantly improve the experience of the urban block from the street and enhances the public realm around the site. The design creates an open, publicly accessible, mixed use ground plane with active ground floor frontages, newly shaped public spaces and a new route connecting West Central Street and High Holborn. The proposed buildings on West Central Street and Vine Lane are of high architectural quality and would create a cohesive and coherent townscape that makes a positive contribution to the area.

27.13 As well as the public benefits the scheme has been designed to minimise the impact of the scheme on neighbouring properties in terms of loss of light, outlook and privacy.

27.14 In conclusion, the proposed development does conflict with policy D2 of the Local Plan and HC1 of the London Plan, but there is not considered to be conflict with the development plan as a whole. The scheme will deliver new homes and jobs as well as a safer, more attractive and more inclusive public realm. The architectural design of the new buildings is very high-quality. The proposals would assist in delivering the objectives of growth in the Tottenham Court Road Growth Area and 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 facilities, an excellent public realm and optimising densities. Taking account of the policies of development plan and all the material planning considerations the proposals would deliver significant social, environmental and economic benefits that outweigh the less than substantial harm to heritage assets and it is therefore recommended that planning permission be granted.

## **28 CONCLUSION – listed building consent**

28.1 The alterations to the listed buildings on the site are largely positive, restoring plan forms and reinstating features that would have been their originally. Subject to conditions, the listed building consent application is considered acceptable.

## **29 RECOMMENDATIONS**

**29.1 Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement covering the aforementioned Heads of Terms.**

**29.2 Listed building consent is recommended subject to conditions.**

### **30 LEGAL COMMENTS**

30.1 Members are referred to the note from the Legal Division at the start of the Agenda.



**31 CONDITIONS – PLANNING APPLICATION**

<p>1</p>	<p>Three years from the date of this permission</p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
<p>2</p>	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Existing plans:</p> <p>Site-wide Location Plan 295_P10.001 B, Existing Site Plan 295_P10.002 B.</p> <p>1MS Existing Second Basement Floor Plan 295_P10.098 B, Existing First Basement Floor Plan 295_P10.099 B, Existing Ground Floor Plan 295_P10.100 B, Existing First Floor Plan 295_P10.101 B, Existing Second Floor Plan 295_P10.102 B, Existing Third Floor Plan 295_P10.103 B, Existing Fourth Floor Plan 295_P10.104 B, Existing Fifth Floor Plan 295_P10.105 B, Existing Sixth Floor Plan 295_P10.106 B, Existing Seventh Floor Plan 295_P10.107 B, Existing Eighth Floor Plan 295_P10.108 B, Existing Nineth Floor Plan 295_P10.109 B, Existing Tenth Floor Plan 295_P10.110 B, Existing Eleventh Floor Plan 295_P10.111 B, Existing Twelfth Floor Plan 295_P10.112 B, Existing Thirteenth Floor Plan 295_P10.113 B, Existing Fourteenth Floor Plan 295_P10.114 B, Existing Fifteenth Floor Plan 295_P10.115 B, Existing Sixteenth Floor Plan 295_P10.116 B.</p> <p>West Central Street Existing Basement Plan 295B_P10.179 B, Existing Ground Floor Plan 295B_P10.180 B, Existing First Floor Plan 295B_P10.181 B, Existing Second Floor Plan 295B_P10.182 B, Existing Third Floor Plan 295B_P10.183 B, Existing Fourth Floor Plan 295B_P10.184 B, Existing Roof Plan 295B_P10.185 B.</p> <p>Site-wide elevations Existing West Central Street Elevation North 295_P10.200 B, Existing West Central Street Elevation South 295_P10.201 B, Existing West Central Street Elevation West 295_P10.202 B, Existing West Central Street Elevation East 295_P10.203 B, Existing Museum Street Elevation 295_P10.204 B, Existing High Holborn Elevation 295_P10.205 B, Existing New Oxford Street Elevation 295_P10.206 B.</p> <p>Demolition drawings</p>

Demolition Site Plan 295\_P10.300 B, Demolition Plan - Basement Floor 295B\_P10.300 B, Demolition Plan - Ground Floor 295B\_P10.301 B, Demolition Plan - First Floor 295B\_P10.302 B, Demolition Plan - Second Floor 295B\_P10.303 B, Demolition Plan - Third Floor 295B\_P10.304 B, Demolition Plan - Fourth Floor 295B\_P10.305 B, Demolition Plan – Roof 295B\_P10.306 B, Demolition Elevations - Museum Street & New Oxford Street 295B\_P10.400 B, Demolition Elevations - West Central Street 295B\_P10.401 B, Demolition Elevations – Courtyard 295B\_P10.402 B.

Proposed plans:

Site-wide

Proposed Site Plan 295\_P20.003 B, Proposed Landscape GA Plan 295\_P20.006 C, Proposed Landscape Paving Plan - Kerb Types 295\_P20.010 C, Proposed Levels and Drainage Intent Plan 295\_P20.011 C, Proposed Furniture Plan 295\_P20.012 C, Proposed Second Basement Plan 295\_P20.098 B, Proposed First Basement Plan 295\_P20.099 B, Proposed Ground Floor Plan 295\_P20.100 C, Proposed First Floor Plan 295\_P20.101 D, Proposed Second Floor Plan 295\_P20.102 C, Proposed Third Floor Plan 295\_P20.103 C, Proposed Forth Floor Plan 295\_P20.104 C, Proposed Fifth Floor Plan 295\_P20.105 B, Proposed Sixth Floor Plan 295\_P20.106 B, Proposed Seventh Floor Plan 295\_P20.107 B, Proposed Eighth Floor Plan 295\_P20.108 B, Proposed Ninth Floor Plan 295\_P20.109 B, Proposed Tenth Floor Plan 295\_P20.110 B, Proposed Eleventh Floor Plan 295\_P20.111 B, Proposed Twelfth Floor Plan 295\_P20.112 B, Proposed Thirteenth Floor Plan 295\_P20.113 B, Proposed Fourteenth Floor Plan 295\_P20.114 B, Proposed Fifteenth Floor Plan 295\_P20.115 B, Proposed Sixteenth Floor Plan 295\_P20.116 B, Proposed Seventeenth Floor Plan 295\_P20.117 B, Proposed Eighteenth Floor Plan 295\_P20.118 B, Proposed Roof Plan 295\_P20.121 B.

1MS

1MS - Proposed Ground Floor Plan 295A\_P20.130 C, 1MS - Proposed First Floor Plan 295A\_P20.131 C, 1MS - Proposed Second Floor Plan 295A\_P20.132 B, 1MS - Proposed Third Floor Plan 295A\_P20.133 B, 1MS - Proposed Fourth Floor Plan 295A\_P20.134 B, 1MS - Proposed Fifth Floor Plan 295A\_P20.135 B, 1MS - Proposed Sixth Floor Plan 295A\_P20.136 B, 1MS - Proposed Seventh Floor Plan 295A\_P20.137 B, 1MS - Proposed Eighth Floor Plan 295A\_P20.138 B, 1MS - Proposed Ninth Floor Plan 295A\_P20.139 B, 1MS - Proposed Tenth Floor Plan 295A\_P20.140 B, 1MS - Proposed Eleventh Floor Plan 295A\_P20.141 B, 1MS - Proposed Twelfth Floor Plan 295A\_P20.142 B, 1MS - Proposed Thirteenth Floor Plan 295A\_P20.143 B, 1MS - Proposed Fourteenth Floor Plan 295A\_P20.144 B, 1MS - Proposed Fifteenth Floor Plan 295A\_P20.145 B, 1MS - Proposed Sixteenth Floor Plan 295A\_P20.146 B, 1MS - Proposed Seventeenth Floor Plan 295A\_P20.147 B, 1MS - Proposed Eighteenth Floor Plan 295A\_P20.148 B, 1MS - Proposed Roof Plan 295A\_P20.151 B, 1MS - Level 8 Landscape Terrace Plan 295A\_P20.181 B, 1MS - Level 11 Landscape Terrace Plan 295A\_P20.182 B,

#### Vine Lane Building

Vine Lane Building - Proposed Ground Floor Plan 295A\_P20.160 B, Vine Lane Building - Proposed First Floor Plan 295A\_P20.161 B, Vine Lane Building - Proposed Second Floor Plan 295A\_P20.162 B, Vine Lane Building - Proposed Third Floor Plan 295A\_P20.163 C, Vine Lane Building - Proposed Fourth Floor Plan 295A\_P20.164 B, Vine Lane Building - Proposed Fifth Floor Plan 295A\_P20.165 B, Vine Lane Building - Proposed Roof Plan 295A\_P20.166 B,

#### High Holborn Building

High Holborn - Proposed Ground and First Floor Plan 295A\_P20.170 B, High Holborn - Proposed Second and Third Floor Plan 295A\_P20.171 B, High Holborn - Proposed Fourth Floor and Fifth Plan 295A\_P20.172 B, High Holborn - Proposed Roof Plan 295A\_P20.173 B,

#### West Central Street

General Arrangement: Proposed Basement Floor Plan 295B\_P20.179 B, General Arrangement: Proposed Ground Floor Plan 295B\_P20.180 B, General Arrangement: Proposed First Floor Plan 295B\_P20.181 B, General Arrangement: Proposed Second Floor Plan 295B\_P20.182 B, General Arrangement: Proposed Third Floor Plan 295B\_P20.183 B, General Arrangement: Proposed Fourth Floor Plan 295B\_P20.184 B, General Arrangement: Proposed Fifth Floor Plan 295B\_P20.185 B, General Arrangement: Proposed Roof Plan 295B\_P20.186 B, West Central Street - First Floor Landscape Plan 295B\_P20.121 B.

#### Landscape plans:

Open Space & Amenity Space: Proposed Ground Floor Plan 295\_P20.190, Open Space & Amenity Space: Proposed First Floor Plan 295\_P20.191, Open Space & Amenity Space: Proposed Fourth Floor Plan 295\_P20.192, Open Space & Amenity Space: Proposed Eighth Floor Plan 295\_P20.193, Open Space & Amenity Space: Proposed Eleventh Floor Plan 295\_P20.194, Open Space & Amenity Space: Proposed Eighteenth Floor Plan 295\_P20.195.

#### Proposed site-wide elevations

Proposed West Central Street Elevation North 295\_P30.100 B, Proposed West Central Street Elevation South 295\_P30.101 C, Proposed West Central Street Elevation West 295\_P30.102 B, Proposed West Central Street Elevation East 295\_P30.103 C, Proposed Museum Street Elevation 295\_P30.104 C, Proposed High Holborn Elevation 295\_P30.105 C, Proposed New Oxford Street Elevation 295\_P30.106 C.

#### Proposed elevations – 1MS

Proposed West Central Street Elevation – South 295A\_P30.110 C, Proposed Museum Street Elevation 295A\_P30.111 C, Proposed High Holborn Elevation 295A\_P30.112 C, Proposed Vine Lane Elevation 295A\_P30.113 C, Proposed West Central Street Elevation – South 295A\_P30.110 C, Proposed Museum Street Elevation 295A\_P30.111 C, Proposed High Holborn Elevation 295A\_P30.112 C, Proposed Vine Lane Elevation 295A\_P30.113 C.

Proposed elevations – Vine Lane Building  
Proposed Vine Lane/West Central Street Elevation 295A\_P30.120 B,  
Proposed Vine Lane (Crank) & South Elevation 295A\_P30.121 B, Proposed  
West Elevation 295A\_P30.122 C, Proposed North Elevation 295A\_P30.123 B.

Proposed elevations – High Holborn Building  
Proposed Vine Lane and South Elevation 295A\_P30.130 C, Proposed High  
Holborn and West Elevation 295A\_P30.131 A.

Proposed elevations – West Central Street  
Museum Street & New Oxford Street Elevations 295B\_P30.140 B, West  
Central Street Elevations 295B\_P30.141 B, Courtyard Elevations - Sheet 1  
295B\_P30.142 B, Courtyard Elevations - Sheet 2 295B\_P30.143 B.

Proposed site sections  
Proposed Site Section AA 295\_P40.001 C, Proposed Site Section BB  
295\_P40.002 C.

Proposed landscape and public realm sections  
Proposed Site Section/Elevation AA-BB 295\_P40.005 C, Proposed Site  
Section/Elevation CC 295\_P40.006, Proposed Site Section/Elevation DD  
295\_P40.007 C, Proposed Street Sections EE-FF 295\_P40.008 C, Proposed  
Street Sections GG-HH-JJ 295\_P40.009 B.

Proposed sections – 1MS  
1MS Proposed Section AA and BB 295A\_P40.101 C, 1MS Proposed Section  
CC and DD 295A\_P40.102 C, 1MS - 8th Terrace Landscape Sections  
295A\_P40.011 B, 1MS - 11th Terrace Landscape Sections 295A\_P40.012 B.

Proposed sections Vine Lane Building  
Proposed Section AA 295A\_P40.110 B, Proposed Section BB CC  
295A\_P40.111 B.

Proposed section – High Holborn  
Proposed Section AA and BB 295A\_P40.120 B.

Proposed sections – West Central Street  
Proposed Section AA 295B\_P40.100 B, Proposed Section BB 295B\_P40.101  
B.

Documents: Covering letter (Iceni) 13 June 2023, Planning Statement (June  
2023) Iceni Projects, Design and Access Statement (June 2023) DSDHA,  
Noise and Vibration Impact Assessment (June 2023) Scotch Partners, Health  
Impact Assessment (October 2023) Iceni Projects, Socio-Economic Statement  
(June 2023) Iceni, Crime Impact Assessment (June 2023) prepared by Hurley  
Palmer Flatt, Basement Impact & Structural Impact Assessment (2023) A-  
Squared Studio, Internal Daylight, Sunlight and Overshadowing Assessment  
(June 2023) GIA, Daylight and Sunlight Assessment (June 2023) GIA, Internal  
Daylight, Sunlight and Overshadowing Assessment (June 2023) GIA,  
Arboricultural Assessment (June 2023) Tim Moya Associates, Fire Statement

	<p>(June 2023) OFR, Affordable Housing Financial Viability Assessment (2023) prepared by Gerald Eve, Addendum to Financial Viability Assessment (June 2023) Gerald Eve, Affordable Housing Statement (June 2023) Gerald Eve, Heritage, Townscape and Visual Impact Assessment (June 2023) The Townscape Consultancy, Environmental Wind Planning Report (June 2023) Arup; Site Waste Management Plan Construction Phase (June 2023) prepared by Arup, Site Waste Management Plan Demolition Phase, prepared by Arup, Air Quality Assessment (June 2023) Arup, Archaeological Assessment (June 2023) Arup, Construction Management Plan (June 2023) Arup, Delivery and Servicing Management Plan (June 2023) Arup, Demolition Environmental Management Plan (June 2023) Arup, Flood Risk Assessment (June 2023) Arup, Hotel Needs Assessment (May 2023) Icení, Air Quality – Technical Note (23 June 2023) Arup, Circular Economy Statement (June 2023) Scotch Partners, Energy Assessment (June 2023) Scotch Partners, Statement of Community Involvement (June 2023) LCA, Sustainability Statement (June 2023) Scotch Partners, Whole Life Carbon Comparison (June 2023) DSDHA &amp; Scotch Partners, 1 Museum Street – Selkirk House Retention &amp; Redevelopment Options Review and WLC Comparison Addendum (20/09/2023) Scotch Partners, One Museum Street - Selkirk House Retention &amp; Redevelopment Options Review &amp; WLC comparison (July 2023) DSDHA, Survey Statement (25<sup>th</sup> September 2023) Gardiner &amp; Theobald, Whole Life Carbon Addendum Rev 01 (19/09/23) Scotch Partners, Pre-Demolition Audit Issue 2 (25 September 2023) Arup, Below Ground Drainage Strategy (June 2023) HTS, Ecology Statement (June 2023) Biodiversity by Design, Framework Travel Plan (June 2023) Arup, Listed Building Consent Structural Report - prepared by HTS, Listed Building Heritage Statement (June 2023) The Townscape Consultancy, Statement of Developer Contributions (June 2023) Icení Projects, Transport Assessment (June 2023) Arup, Detailed Schedule of Works (June 2023) DSDHA, Air Quality Technical Note (11 October 2023) Arup, Addendum to Basement Impact Assessment - Demolition Works 2633-A2S-XX-XX-TN-Y-0001-00 (A-squared Studio) 05.10.23.</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Detailed drawings/samples – 1 Museum Street</p> <p>Prior to commencement of the above ground works on the new building, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p> <ul style="list-style-type: none"> <li>a) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills and external doors and canopies</li> <li>b) Plan, elevation and section drawings, of all ground floor facades at a scale of 1:10;</li> <li>c) Typical plan, elevation and section drawings of balustrading to terraces and balconies;</li> <li>d) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and sample panels at a minimum of 1mx1m of those materials (to be provided on site).</li> <li>e) Details of cladding and façade treatment/louvres to any mechanical plant or machinery enclosures at roof terrace levels;</li> </ul>

	<p>f) Typical elevation (minimum 2m x 2m in size) of each building including a glazed opening showing reveal and header detail and facing materials  g) Details of relevant gates, railings, doors and louvres on all parts of the building which face the public realm.</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works for the relevant building.</p> <p>Reason: In order to safeguard the appearance of the buildings and the character and appearance of the wider area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.</p>
4	<p>Detailed drawings/samples – West Central Street block</p> <p>Prior to commencement of the above ground works on the new building, and in the case of extensions to existing buildings prior to the commencement of the approved extensions, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p> <ul style="list-style-type: none"> <li>a) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills and external doors and canopies</li> <li>b) Plan, elevation and section drawings, of all ground floor facades at a scale of 1:10;</li> <li>c) Typical plan, elevation and section drawings of balustrading to terraces and balconies;</li> <li>d) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and sample panels at a minimum of 1mx1m of those materials (to be provided on site).</li> <li>e) Details of cladding and façade treatment/louvres to any mechanical plant or machinery enclosures at roof terrace levels;</li> <li>f) Typical elevation (minimum 2m x 2m in size) of each building including a glazed opening showing reveal and header detail and facing materials</li> <li>g) Details of relevant gates, railings, doors and louvres on all parts of buildings which face the public realm.</li> </ul> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works for the relevant building.</p> <p>Reason: In order to safeguard the appearance of the buildings and the character and appearance of the wider area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.</p>
5	<p>Detailed drawings/samples – Vine Lane Building</p> <p>Prior to commencement of the above ground works on the new building, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p> <ul style="list-style-type: none"> <li>a) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills and external doors and canopies</li> </ul>

	<p>b) Plan, elevation and section drawings, of all ground floor facades at a scale of 1:10;</p> <p>c) Typical plan, elevation and section drawings of balustrading to terraces and balconies;</p> <p>d) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and sample panels at a minimum of 1mx1m of those materials (to be provided on site).</p> <p>e) Details of cladding and façade treatment/louvres to any mechanical plant or machinery enclosures at roof terrace levels;</p> <p>f) Typical elevation (minimum 2m x 2m in size) of each building including a glazed opening showing reveal and header detail and facing materials</p> <p>g) Details of relevant gates, railings, doors and louvres on parts of the building which face the public realm.</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works for the relevant building.</p> <p>Reason: In order to safeguard the appearance of the buildings and the character and appearance of the wider area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.</p>
6	<p>Detailed drawings/samples – High Holborn Building</p> <p>Prior to commencement of the above ground works on the new building, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:</p> <p>a) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills and external doors and canopies</p> <p>b) Plan, elevation and section drawings, of all ground floor facades at a scale of 1:10;</p> <p>c) Typical plan, elevation and section drawings of balustrading to terraces and balconies;</p> <p>d) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and sample panels at a minimum of 1mx1m of those materials (to be provided on site).</p> <p>e) Details of cladding and façade treatment/louvres to any mechanical plant or machinery enclosures at roof terrace levels;</p> <p>f) Typical elevation (minimum 2m x 2m in size) of each building including a glazed opening showing reveal and header detail and facing materials</p> <p>g) Details of relevant gates, railings, doors and louvres on parts of the building which face the public realm.</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works for the relevant building.</p> <p>Reason: In order to safeguard the appearance of the buildings and the character and appearance of the wider area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.</p>
7	<p>Bay panel – 1 Museum Street</p>

	<p>A full scale sample panel of one whole bay for the tower element shall be provided on site and approved in writing by the local planning authority before the relevant parts of the works are commenced and the development shall be carried out in accordance with the approval given. The approved panel shall be retained on site until the work has been completed.</p> <p>Reason: In order to safeguard the appearance of the buildings and the character and appearance of the wider area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.</p>
8	<p>External fixtures</p> <p>No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials or satellite dishes shall be fixed or installed on the external face of the buildings, without the prior approval in writing of the Council.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of Camden Local Plan policies D1 and D2.</p>
9	<p>Refuse and recycling</p> <p>Prior to first occupation of the residential units in each new residential block, the refuse and recycling storage areas shall be completed and made available for occupants of that block.</p> <p>The development of each block shall not be implemented other than in accordance with such measures as approved. All such measures shall be in place prior to the first occupation of any residential units in the relevant plot and shall be retained thereafter.</p> <p>Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of Camden Local Plan policy CC5.</p>
10	<p>Roof terraces</p> <p>a) No flat roofs within the development shall be used as terraces unless marked as such on the approved plans, without the approval in writing of the Local Planning Authority.</p> <p>b) Details of the proposed screen on the fourth floor, including the planted buffer zone, of the Vine Lane building shall be submitted to and approved in writing by the Local Planning Authority, prior to occupation of the Vine Lane building. The screen shall be built in accordance with the approved details and retained throughout the use of the development.</p> <p>Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of policy A1 of the Camden Local Plan.</p>



11	<p>Living roofs</p> <p>Prior to commencement of above ground development, of each block further details of the green roofs (design, sections, species and maintenance) for that block are to be submitted to and approved in writing by the Council. The green roofs shall thereafter be constructed in accordance with the approved details prior to occupation of the relevant block, and they shall thereafter be retained and maintained in accordance with those details.</p> <p>Reason: To ensure the development is sustainable and promotes biodiversity in line with Camden Local Plan policies CC1, CC3 and A3.</p>
12	<p>Suitable qualified engineer</p> <p>The development hereby approved shall not commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works throughout their duration to ensure compliance with the design which has been checked and approved by a building control body. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.</p> <p>Reason: To safeguard the appearance and structural stability of neighbouring buildings and the character of the immediate area in accordance with the requirements of policies D1, D2 and A5 of the London Borough of Camden Local Plan 2017.</p>
13	<p>Water efficiency</p> <p>The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, allowing 5 litres/person/day for external water use. Prior to occupation of each Plot, evidence demonstrating that this has been achieved shall be submitted and approved by the Local Planning Authority.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with Camden Local Plan policy CC3.</p>
14	<p>Non-road mobile machinery</p> <p>No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).</p>

	<p>Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of Camden Local Plan policies A1 and CC4.</p>
15	<p>Sound insulation</p> <p>All habitable rooms exposed to external road traffic noise in excess of 55 dBA Leq 16 hour [free field] during the day [07.00 to 23.00 hours] or 45 dBA Leq 8 hour [free field] at night [23.00 to 07.00 hours] shall be subject to sound insulation measures to ensure that all such rooms achieve an internal noise level of 35 dBA Leq 16 hour during the day and 30 dBA Leq 8 hour at night. The submitted scheme shall ensure that habitable rooms subject to sound insulation measures shall be able to be effectively ventilated without opening windows.</p> <p>No dwelling shall be occupied until the approved sound insulation and ventilation measures have been installed to that property in accordance with the approved details. The approved measures shall be retained thereafter in perpetuity.</p> <p>Reason: To ensure that the amenities of future occupiers are protected in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
16	<p>Plant noise</p> <p>The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>
17	<p>Anti-vibration</p> <p>Prior to use, machinery, plant or equipment at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To ensure that the amenity of occupiers of the development site and surrounding premises is not adversely affected by vibration in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
18	<p>Cycle parking</p>

	<p>Prior to first occupation of each relevant building, the following bicycle parking shall be provided in its entirety:</p> <ul style="list-style-type: none"> <li>• secure and covered parking for 345 bicycles for the office building at 1 Museum Street</li> <li>• secure and covered parking for 37 resident's bicycles for the West Central Street block</li> <li>• secure and covered parking for 8 resident's bicycles for the High Holborn building</li> <li>• secure and covered parking for 28 resident's bicycles for the Vine Lane building</li> <li>• Secure and covered parking for 11 bicycles for the ground floor flexible Class E retail uses</li> </ul> <p>All such facilities shall thereafter be permanently maintained and retained.</p> <p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with Camden Local Plan policies T1 and T2, the London Plan and CPG Transport.</p>
19	<p>Part M4 (2)</p> <p>The units indicated as such on the plan numbers hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (2), evidence demonstrating compliance should be submitted to and approved by the Local Planning Authority prior to occupation of the relevant unit.</p> <p>Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policy DP6 of the London Borough of Camden Local Development Framework Development Policies.</p>
20	<p>Part M4 (3)</p> <p>The units indicated as such on the plan numbers hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (3). Evidence demonstrating compliance should be submitted to and approved by the Local Planning Authority prior to occupation of the relevant unit.</p> <p>Reason: To ensure that the wheelchair units would be capable of providing adequate amenity in accordance with policies: CS6 &amp; DP6 of Camden's Local Development Framework 2010.</p>
21	<p>Landscaping</p> <p>Full details of landscaping, including native species and species identified within the Royal Horticultural Society's plants for pollinators lists, shall be submitted to and approved in writing by the Local Planning Authority, prior to commencement of work on the new buildings excluding the cores and substructures. The</p>

	<p>landscaping scheme shall include details of replacement tree planting. The landscaping details thus approved shall thereafter be carried out in full prior to first occupation of the buildings.</p> <p>All hard and soft landscaping works shall be carried out in accordance with the approved landscape details [by not later than the end of the planting season following completion of the development or any phase of the development] [, prior to the occupation for the permitted use of the development or any phase of the development], whichever is the sooner. Any trees or areas of planting (including trees existing at the outset of the development other than those indicated to be removed) which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.</p> <p>Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3, A5 D1 and D2 of the London Borough of Camden Local Plan 2017 and Hampstead Neighbourhood Plan policies NE1, NE2 and NE4.</p>
22	<p>Landscaping - replacement planting</p> <p>All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the development or any phase of the development. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.</p> <p>Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policies A2, A3, D1 and D2 of the London Borough of Camden Local Plan 2017.</p>
23	<p>Tree Protection Strategy</p> <p>Prior to the commencement of the relevant part of construction/demolition works on site, full details of tree protection measures shall be submitted to and approved in writing by the Local Planning Authority. The works shall commence in accordance with approved details and the protection shall then remain in place for the duration of works on site, unless otherwise agreed in writing by the local authority.</p> <p>Reason: To ensure that the development will not have an adverse effect on existing trees and in order to maintain the character and amenity of the area in</p>

	accordance with the requirements of policies A2 and A3 of the London Borough of Camden Local Plan 2017.
24	<p>Bird and bat boxes</p> <p>Prior to commencement of work on the new buildings excluding the cores and substructures, a plan detailing bird and bat box locations and types shall be submitted to and approved in writing by the local planning authority. The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter permanently retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan and policy A3 of the Camden Local Plan 2017.</p>
25	<p>Lighting</p> <p>Details of the proposed lighting scheme, to include a lux levels plan, (including any mitigation for expected light spill, especially during the active period for bats between November – May), shall be submitted to and approved in writing by the Local Planning Authority. The approved lighting scheme and mitigation measures should be implemented in accordance with the approved details prior to occupation and retained and maintained as such thereafter.</p> <p>Reason: In the interest of ecology, visual amenity and promoting a safe and secure environment in accordance with policies A1, A2, A3 and C5 of the Camden local Plan.</p>
26	<p>SuDS: Further details</p> <p>Prior to commencement of work on the new buildings excluding the cores and substructures, full details of the sustainable drainage system including 158.1m<sup>3</sup> of attenuation tanks and 117.1m<sup>3</sup> of blue roof storage and additional green roofs, shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water or on any part of the entire development site for up to and including a 1:30 year storm. The details shall demonstrate a site run-off rate conforming to the greenfield run-off rate or other rate of 10 l/s approved by the Local Planning Authority. An up to date drainage statement, SuDS pro-forma, a lifetime maintenance plan and supporting evidence should be provided including:</p> <ul style="list-style-type: none"> <li>• The proposed SuDS or drainage measures including storage capacities</li> <li>• The proposed surface water discharge rates or volumes</li> </ul> <p>The approved systems shall be implemented prior to occupation of the development and thereafter retained and maintained in accordance with the approved details.</p>

	<p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</p>
27	<p>SuDS: Evidence of installation</p> <p>Prior to occupation, evidence that the system has been implemented in accordance with the approved details as part of the development shall be submitted to the Local Planning Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</p>
28	<p>Water Efficiency</p> <p>The development hereby approved shall achieve a maximum internal water use of 105 litres/person/day, and 5 litres/person/day for external water use. The dwelling/s shall not be occupied until the Building Regulation optional requirement has been complied with.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC1, CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 5 of the London Plan 2021.</p>
29	<p>Piling</p> <p>The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with TfL Infrastructure Protection and Thames Water) have been submitted to and approved in writing by the local planning authority which:</p> <ol style="list-style-type: none"> <li>1. Provide details of below ground works at 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street.</li> <li>2. Identify and accommodate London Underground (LU) structures and tunnels.</li> <li>3. Details of any changes in loading to LU's infrastructure considering sequence of temporary and permanent works.</li> <li>4. Provide staged ground movement impact assessment arising from temporary works and permanent works during demolition and construction stages to be undertaken.</li> <li>5. Accommodate ground movement arising from the development construction thereof.</li> <li>6. Provide risk assessment and method statement for the proposed demolition and construction works including temporary works, use of mobile cranes as well as tower cranes.</li> </ol>

	<p>7. Mitigate the effects of noise and vibration arising from the adjoining railway operations.</p> <p>The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.</p> <p>Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.</p>
30	<p>Archaeology</p> <p>Prior to the commencement of development a programme of archaeological investigation shall be prepared in consultation with Historic Engand's Greater London Archaeological Advisory Service including the details of the suitably qualified investigating body to carry out such archaeological works as required and shall be submitted to and approved in writing by the local planning authority.</p> <p>The development shall then only take place in accordance with such details as have been approved.</p> <p>Reason: Important archaeological remains may exist on this site. Accordingly the Local planning authority wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development in accordance with the requirements of policy D2 of the London Borough of Camden Local Plan 2017.</p>
31	<p>Feasibility Study for photo-voltaic cells</p> <p>Prior to work commencing on the roof structures of the 1 Museum Street and High Holborn buildings, a feasibility assessment for the location of photovoltaic panels on the approved development shall be submitted to and approved by the Local Planning Authority in writing. If feasible the measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. The cells shall be installed prior to occupation of the relevant buildings in full accordance with details that have first been approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of Policy G1, CC1 and CC2 of the London Borough of Camden Local Plan 2017.</p>
32	<p>Removal of permitted development rights</p> <p>Notwithstanding the provisions of Part 3 of the Schedule of the Town and Country Planning (Use Classes) Order, 2015, or any provision equivalent to</p>

	<p>that Class in any statutory instrument revoking and re-enacting that Order, the following restrictions will apply to the development:  The 22,650 sqm of floorspace approved as Class E (g) office space cannot be used for any other use outside of that specified in the Order;  The 1,667 sqm of flexible Class E use at ground floor level cannot be used as Class E (g) offices.</p> <p>Reason: To ensure that the uses approved come forward in line with the permission in accordance with policies TC1, TC2, T1, E1 and E2 of the London Borough of Camden Local Plan 2017.</p>
33	<p>Fire Statement</p> <p>The development shall be constructed in accordance with, and at all times occupied and managed in strict compliance with, the approved Fire Statement.</p> <p>Reason: To ensure the development incorporates the necessary fire safety measures in accordance with policies D5 and D12 of the London Plan.</p>
34	<p>Full fibre connectivity</p> <p>Prior to occupation of each block, detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development, shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure full connectivity in line with policy SI6 of the London Plan 2021.</p>
35	<p>Urban Greening Factor (UGF)</p> <p>The development shall achieve a UGF Score of 0.3, prior to occupation and shall be retained as such in perpetuity.</p> <p>Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity, character and biodiversity of the area in accordance with the requirements of policies A2, A3 and D1 of the London Borough of Camden Local Plan 2017 and policy G5 of the London Plan 2021.</p>
36	<p>Diesel back-up generators</p> <p>Prior to commencement of above ground works details of the proposed Emergency Diesel Generator Plant and any associated abatement technologies including make, model and emission details shall have been submitted to and approved by the Local Planning Authority in writing. Generators should be appropriately sized for life saving functions only, alternatives to diesel fully considered and testing minimised. The maintenance and cleaning of the systems shall be undertaken regularly in accordance with manufacturer specifications and details of emission certificates by an accredited MCERTS organisation shall</p>



	<p>be provided following installation and thereafter every three years to verify compliance with regulations made by the Secretary of State.</p> <p>Reason: To safeguard the amenity of occupants, adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan 2017.</p>
37	<p>Emergency Generator flues</p> <p>Unless otherwise agreed in writing by the local planning authority, all combustion flues must terminate at least 1m above the highest roof of the building and any other within a 20m radius, in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.</p> <p>Reason: In order to ensure the proposed development does not have a detrimental impact on occupiers of residential premises within the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and PM2.5, in accordance with policy CC4 of the London Borough of Camden Local Plan 2017 and London Plan policy SI 1.</p>
38	<p>Sealed windows</p> <p>All the windows at first floor level on New Oxford Street and West Central Street shall be fixed shut and maintained as such in perpetuity.</p> <p>Reason: To safeguard the amenity of future occupiers in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan 2017.</p>
39	<p>Whole Life-Cycle Carbon Assessment</p> <p>Prior to the occupation of the development: The post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template shall be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance. The post-construction assessment shall be submitted to the GLA at <a href="mailto:ZeroCarbonPlanning@london.gov.uk">ZeroCarbonPlanning@london.gov.uk</a> along with any supporting evidence as per the guidance.</p> <p>Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the development.</p> <p>Reason: To ensure the development minimises its effects on climate change as far as possible in accordance with policies CC1 and CC2 of the London Borough of Camden Local Plan and Policy SI 7 of the London Plan 2021.</p>
40	<p>GLA Post-Construction Report</p> <p>Prior to occupation of each building, a post-construction monitoring report and spreadsheet shall be completed in line with the GLA's Circular Economy Statement Guidance. The post-construction monitoring report shall be</p>

	<p>submitted to the GLA (by email to: <a href="mailto:circulareconomystatements@london.gov.uk">circulareconomystatements@london.gov.uk</a>), along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the buildings.</p> <p>Reason: To ensure sustainable waste management and to maximise the re-use of materials in accordance with policy CC5 of the Camden Local Plan 2017, and Policy SI 7 of the London Plan 2021.</p>
41	<p><b>Waste Water Heat Recovery:</b></p> <p>Prior to commencement of development other than site clearance &amp; preparation, a feasibility assessment into waste water heat recovery with the aim of maximising the energy efficiency of the development should be submitted to the local planning authority and approved in writing. The buildings shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development contributes to minimising the effects of, and can adapt to a changing climate in accordance with policies CC1 and CC2 of the London Borough of Camden Local Plan 2017.</p>
42	<p><b>Low carbon heat network feasibility study</b></p> <p>Prior to commencement a detailed feasibility study of potential ground, sewer source, waste source heat and any other potential low or zero carbon heat network options, (including evidence of confirmation or otherwise from the network operator that the network has the capacity to serve the new development, together with supporting estimates of the CO2 emission factor to meet the limit set out in Part L 2021, installation cost and timescales for connection) should be submitted and approved in writing by the Local Planning Authority. Prior to occupation, evidence demonstrating that the approved measures have been implemented shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure the development contributes to minimising the effects of, and can adapt to a changing climate in accordance with policies CC1 and CC2 of the London Borough of Camden Local Plan 2017 and London Plan Policy SI 3.</p>
43	<p><b>Air Source Heat Pump</b></p> <p>Prior to commencement of above ground works, details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or SCOP of 3.4) and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the</p>

	<p>details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local Plan 2017.</p>
44	<p>Rainwater/ greywater harvesting:</p> <p>Prior to commencement of development other than site clearance &amp; preparation, a feasibility assessment for rainwater/greywater recycling should be submitted to and approved in writing by the local planning authority. If considered feasible, details shall be submitted to the local authority and approved in writing. The development shall thereafter be constructed in accordance with the approved details.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CC2 and CC3 of the London Borough of Camden Local plan 2017 and Policy SI 13 of the London Plan 2021.</p>
45	<p>Reuse and recycling of demolition waste</p> <p>The demolition hereby approved shall divert at least 95% of demolition waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. Prior to occupation, evidence demonstrating that this has been achieved shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1 of the London Borough of Camden Local Plan 2017, Camden Planning Guidance, and Policy SI 7 of the London Plan 2021.</p>
46	<p>Construction related impacts – monitoring</p> <p>Air quality monitoring should be implemented on site. No development shall take place until</p> <ol style="list-style-type: none"> <li>1. prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they will be installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;</li> <li>2. a confirmation email should be sent to <a href="mailto:airquality@camden.gov.uk">airquality@camden.gov.uk</a> no later than one day after the monitors have been installed with photographic evidence in line with the approved details.</li> </ol>

	<p>3. prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing.</p> <p>The monitors shall be retained and maintained on site in the locations agreed with the local planning authority for the duration of the development works, monthly summary reports and automatic notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be submitted to the Local Planning Authority and approved in writing.</p> <p>Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 and CC4 of the London Borough of Camden Local Plan 2017.</p>
47	<p>Mechanical Ventilation and NO2 Filtration</p> <p>Prior to occupation evidence that an appropriate NO2 filtration system on the mechanical ventilation intake for the first floor flats on New Oxford Street and High Holborn has been installed and a detailed mechanism to secure maintenance of this system should be submitted to the Local Planning Authority and approved in writing.</p> <p>Reason: To safeguard the amenity of the premises in accordance with the requirements of policies A1 (Managing the impact of development) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.</p>
48	<p>Housing</p> <p>The development hereby approved shall provide 44 residential units (Class C3), 25 market units and 12 social rented units and 7 intermediate units.</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
49	<p>Active cooling units</p> <p>It shall be demonstrated, prior to occupation, that the active cooling units have a minimum set point of 26 degrees, limiting energy demand.</p> <p>Reason: To ensure the development contributes to minimising the effects of, and can adapt to a changing climate in accordance with policies CC1 and CC2 of the London Borough of Camden Local Plan 2017 and London Plan Policy SI 3.</p>

32    **INFORMATIVES – PLANNING APPLICATION**

1	<p>Waste comments (Thames Water)</p> <p>Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing <a href="mailto:wwriskmanagement@thameswater.co.uk">wwriskmanagement@thameswater.co.uk</a>. Application forms should be completed on line via <a href="http://www.thameswater.co.uk/wastewaterquality">www.thameswater.co.uk/wastewaterquality</a>.</p> <p>As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes</a>.</p> <p>The proposed development is located within 15m of our underground waste ater assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.<a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes</a>. Should you require further information please contact Thames Water. Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a> Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p>With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.</p> <p>Should you require further information please refer to our website. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices">https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices</a></p>
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	<p>Thames Water would advise that with regard to waste water network and waste water process infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p>
2	<p><b>Water Comments (Thames Water)</b>  Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>
3	<p><b>London Underground</b></p> <p>The applicant is advised to contact London Underground Infrastructure Protection in advance of assessment of impact to London Underground assets, submission of method statement of the demolition and preparation of final design and associated method statements, in particular with regard to: demolition; excavation and construction methods.</p>
4	<p><b>Non-road mobile machinery</b></p> <p>Non-road mobile machinery (NRMM) is any mobile machine or vehicle that is not solely intended for carrying passengers or goods on the road. The Emissions requirements are only applicable to NRMM that is powered by diesel, including diesel hybrids. For information on the NRMM Low Emission Zone requirements and to register NRMM, please visit "<a href="http://nrmm.london/">http://nrmm.london/</a>".</p>
5	<p><b>Cadent Gas</b></p> <p>Cadent Gas Ltd own and operate the gas infrastructure within the area of your development. There may be a legal interest (easements and other rights) in the land that restrict activity in proximity to Cadent assets in private land. The applicant must ensure that the proposed works do not infringe on legal rights of access and or restrictive covenants that exist.</p> <p>If buildings or structures are proposed directly above the apparatus the development may only take place following diversion of the apparatus. The applicant should apply online to have apparatus diverted in advance of any works, by visiting <a href="http://cadentgas.com/diversions">cadentgas.com/diversions</a>.</p> <p>Prior to carrying out works, including the construction of access points, please register on <a href="http://www.linesearchbeforeudig.co.uk">www.linesearchbeforeudig.co.uk</a> to submit details of the planned works for review, ensuring requirements are adhered to.</p>
6	<p><b>Archaeology</b></p> <p>The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.</p>

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**33 CONDITIONS – LISTED BUILDING CONSENT**

<p>1</p>	<p>Three years from the date of this permission</p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
<p>2</p>	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Existing plans:</p> <p>Site-wide Location Plan 295_P10.001 B, Existing Site Plan 295_P10.002 B.</p> <p>West Central Street Existing Basement Plan 295B_P10.179 B, Existing Ground Floor Plan 295B_P10.180 B, Existing First Floor Plan 295B_P10.181 B, Existing Second Floor Plan 295B_P10.182 B, Existing Third Floor Plan 295B_P10.183 B, Existing Fourth Floor Plan 295B_P10.184 B, Existing Roof Plan 295B_P10.185 B.</p> <p>Site-wide elevations Existing West Central Street Elevation North 295_P10.200 B, Existing West Central Street Elevation South 295_P10.201 B, Existing West Central Street Elevation West 295_P10.202 B, Existing West Central Street Elevation East 295_P10.203 B, Existing Museum Street Elevation 295_P10.204 B, Existing High Holborn Elevation 295_P10.205 B, Existing New Oxford Street Elevation 295_P10.206 B.</p> <p>Demolition drawings Demolition Site Plan 295_P10.300 B, Demolition Plan - Basement Floor 295B_P10.300 B, Demolition Plan - Ground Floor 295B_P10.301 B, Demolition Plan - First Floor 295B_P10.302 B, Demolition Plan - Second Floor 295B_P10.303 B, Demolition Plan - Third Floor 295B_P10.304 B, Demolition Plan - Fourth Floor 295B_P10.305 B, Demolition Plan – Roof 295B_P10.306 B, Demolition Elevations - Museum Street &amp; New Oxford Street 295B_P10.400 B, Demolition Elevations - West Central Street 295B_P10.401 B, Demolition Elevations – Courtyard 295B_P10.402 B.</p> <p>Proposed plans:</p> <p>Site-wide Proposed Site Plan 295_P20.003 B, Proposed Landscape GA Plan 295_P20.006 C, Proposed Landscape Paving Plan - Kerb Types 295_P20.010 C, Proposed Levels and Drainage Intent Plan 295_P20.011 C, Proposed</p>



Furniture Plan 295\_P20.012 C, Proposed Second Basement Plan 295\_P20.098 B, Proposed First Basement Plan 295\_P20.099 B, Proposed Ground Floor Plan 295\_P20.100 C, Proposed First Floor Plan 295\_P20.101 D, Proposed Second Floor Plan 295\_P20.102 C, Proposed Third Floor Plan 295\_P20.103 C, Proposed Fourth Floor Plan 295\_P20.104 C, Proposed Fifth Floor Plan 295\_P20.105 B, Proposed Sixth Floor Plan 295\_P20.106 B, Proposed Seventh Floor Plan 295\_P20.107 B, Proposed Eighth Floor Plan 295\_P20.108 B, Proposed Ninth Floor Plan 295\_P20.109 B, Proposed Tenth Floor Plan 295\_P20.110 B, Proposed Eleventh Floor Plan 295\_P20.111 B, Proposed Twelfth Floor Plan 295\_P20.112 B, Proposed Thirteenth Floor Plan 295\_P20.113 B, Proposed Fourteenth Floor Plan 295\_P20.114 B, Proposed Fifteenth Floor Plan 295\_P20.115 B, Proposed Sixteenth Floor Plan 295\_P20.116 B, Proposed Seventeenth Floor Plan 295\_P20.117 B, Proposed Eighteenth Floor Plan 295\_P20.118 B, Proposed Roof Plan 295\_P20.121 B.

#### West Central Street

General Arrangement: Proposed Basement Floor Plan 295B\_P20.179 B, General Arrangement: Proposed Ground Floor Plan 295B\_P20.180 B, General Arrangement: Proposed First Floor Plan 295B\_P20.181 B, General Arrangement: Proposed Second Floor Plan 295B\_P20.182 B, General Arrangement: Proposed Third Floor Plan 295B\_P20.183 B, General Arrangement: Proposed Fourth Floor Plan 295B\_P20.184 B, General Arrangement: Proposed Fifth Floor Plan 295B\_P20.185 B, General Arrangement: Proposed Roof Plan 295B\_P20.186 B, West Central Street - First Floor Landscape Plan 295B\_P20.121 B.

#### Proposed site-wide elevations

Proposed West Central Street Elevation North 295\_P30.100 B, Proposed West Central Street Elevation South 295\_P30.101 C, Proposed West Central Street Elevation West 295\_P30.102 B, Proposed West Central Street Elevation East 295\_P30.103 C, Proposed Museum Street Elevation 295\_P30.104 C, Proposed High Holborn Elevation 295\_P30.105 C, Proposed New Oxford Street Elevation 295\_P30.106 C.

#### Proposed elevations – West Central Street

Museum Street & New Oxford Street Elevations 295B\_P30.140 B, West Central Street Elevations 295B\_P30.141 B, Courtyard Elevations - Sheet 1 295B\_P30.142 B, Courtyard Elevations - Sheet 2 295B\_P30.143 B.

#### Proposed site sections

Proposed Site Section AA 295\_P40.001 C, Proposed Site Section BB 295\_P40.002 C.

#### Proposed sections – West Central Street

Proposed Section AA 295B\_P40.100 B, Proposed Section BB 295B\_P40.101 B.

Documents: Design and Access Statement (June 2023) DSDHA, Heritage, Townscape and Visual Impact Assessment (June 2023) The Townscape

	<p>Consultancy, Listed Building Heritage Statement (June 2023) The Townscape Consultancy.</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Detailed drawings/samples - 10-12 Museum Street</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p> <ul style="list-style-type: none"> <li>a) Details of all proposed new architectural features including cornices, skirtings, fireplaces and surrounds</li> <li>b) Plan, elevation and section drawings of all new internal doors at a scale of 1:10 with typical moulding and architrave details at a scale of 1:1.</li> <li>c) Plan, elevation and section drawings, including jambs, head and cill, of all proposed new and replacement external door openings.</li> <li>d) Plan, elevation and section drawings of all new windows at a scale of 1:10 with typical glazing bar details at 1:1. A schedule is required showing window design, details, and opening mechanism for traditional sash casements.</li> <li>e) Samples and/or manufacturer's details of new facing materials for the proposed new shopfronts (to be provided on site and retained on site during the course of the works).</li> <li>f) Details of service runs for all new bathrooms/kitchens, demonstrating the relationship of new pipework with the structure of the building.</li> <li>g) Details of any proposed new roof finishes and proposed rainwater goods.</li> </ul> <p>Reason: To safeguard the historic appearance and character of the building in accordance with the requirements of Camden Local Plan policies D2.</p>
5	<p>Detailed drawings/samples - 35-37 New Oxford Street</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p> <ul style="list-style-type: none"> <li>a) Details of all proposed new architectural features including cornices, skirtings, fireplaces and surrounds</li> <li>b) Plan, elevation and section drawings of all new internal doors at a scale of 1:10 with typical moulding and architrave details at a scale of 1:1.</li> <li>c) Plan, elevation and section drawings, including jambs, head and cill, of all proposed new and replacement external door openings.</li> <li>d) Plan, elevation and section drawings of all new windows at a scale of 1:10 with typical glazing bar details at 1:1. A schedule is required showing window design, details, and opening mechanism for traditional sash casements.</li> <li>e) Samples and/or manufacturer's details of new facing materials for the proposed new shopfronts (to be provided on site and retained on site during the course of the works).</li> </ul>

	<p>f) Details of service runs for all new bathrooms/kitchens, demonstrating the relationship of new pipework with the structure of the building.</p> <p>g) Details of any proposed new roof finishes and proposed rainwater goods.</p> <p>Reason: To safeguard the historic appearance and character of the building in accordance with the requirements of Camden Local Plan policies D2.</p>
6	<p>Method Statement</p> <p>A method statement of the proposed external repairs including repointing and rendering shall be submitted to and approved by the Local Planning Authority prior to commencement of such works.</p> <p>Reason: To safeguard the historic appearance and character of the building in accordance with the requirements of Camden Local Plan policies D2.</p>

## APPENDIX 1 - Independent Viability Review (BPS)

INSERTS

Selkirk House, 1 Museum Street, 10-12  
Museum Street, 35-41 New Oxford Street,  
and 16a-18 West Central Street, WC1A 1JR  
Independent Viability Review

Prepared on behalf of the London Borough of  
Camden

27<sup>th</sup> July 2023

Planning Reference: 2023/2510/P



215a High Street, Dorking RH4 1RU  
[www.bps-surveyors.co.uk](http://www.bps-surveyors.co.uk)

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## 1.0 Introduction

- 1.1 BPS Chartered Surveyors have been instructed by the London Borough of Camden ('the Council') to undertake a review of a Financial Viability Assessment (FVA) prepared by Gerald Eve ('GE') on behalf of Lab Selkirk House Limited ('the Applicant') in connection with a planning application for the redevelopment of the above site.
- 1.2 BPS were previously instructed by the Council to review two earlier FVA's prepared by GE relating to another planning application, ref. 2021/2954/P on the site. We reported initially in January 2022 and issued a further addendum report in January 2023 following some amendments to the scheme.
- 1.3 We understand that this application has now been withdrawn and a new application ref. 2023/2510/P has been submitted in the context of the recent listing of no. 10-12 Museum Street and no. 35-37 New Oxford Road.
- 1.4 The new application proposals are 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 part-demolition and refurbishment 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.*
- 1.5 The above proposals are broadly in line with the previous application. However, we understand there to be the following key differences between the two schemes:
- Commercial floorspace within West Central St block has increased
  - No. of residential dwellings reduced from 48 to 44
  - No. of affordable dwellings increased from 18 to 19
- 1.6 The proposed office floor space and flexible commercial floorspace (except WSC block) remain unchanged.
- 1.7 The basis of our review is an addendum FVA prepared by GE, dated 1st June 2023, which concludes that the scheme currently shows a deficit of **-£33.5 million (unviable)** and therefore no additional affordable housing can viably be offered.

- 1.8 We understand that despite the viability position being presented by GE, the Applicant is proposing to deliver some onsite affordable housing and other planning contributions. We have summarised this below:

<b>Planning Obligation</b>	<b>Required Contribution</b>	<b>Applicant Contribution</b>
CIL	£2,741,644	£2,741,644
Residential PIL	£1,618,500	£nil
Affordable Housing	50.1% of GIA	50.1% of GIA (11 units)
S106	£3,500,000	£3,500,000
<b>Total Package:</b>	<b>£7,860,144 + 50.1% AH</b>	<b>£6,241,644 + 50.1% AH</b>

- 1.9 We note that GE's appraisal includes lower S106 and CIL figures to those stated within their report. We require clarity on which figures are correct. At this stage we have assumed that the above figures are the correct ones.
- 1.10 We have assessed the cost and value inputs within GE's financial appraisal in order to determine whether the scheme can viably make any additional affordable housing contributions.
- 1.11 We note that GE have, in many cases, maintained the inputs previously agreed within our earlier viability discussions in 2022-23. We have sought to maintain areas of agreement where appropriate to do so. This report should therefore be read in conjunction with, and in the context of, our earlier reports dated January 2022 and January 2023.
- 1.12 We have downloaded documents available on Council's planning website. We have received a live version of the Argus appraisals included in the report.
- 1.13 A Land Registry search shows that the Applicant currently owns part of the site. The Applicant purchased Selkirk House in March 2017 for £76,550,000. The other buildings onsite are under three separate titles all in separate ownership. Further details can be found in our earlier January 2022 report.
- 1.14 The advice set out in this report is provided in the context of negotiating planning obligations and therefore in accordance with PS1 of the RICS Valuation – Global Standards 2020, the provisions of VPS1–5 are not of mandatory application. Accordingly, this report should not be relied upon as a Red Book Valuation. The Valuation Date for this Viability Review is the date of this report, as stated on the title page. This Viability Review has been undertaken in accordance with the Terms & Conditions provided to the Council and with any associated



Letters of Engagement and should only be viewed by those parties that have been authorised to do so by the Council.

- 1.15 This Viability Review adheres to the RICS Professional Statement on Financial Viability in Planning (published May 2019). In accordance with this Statement, we refer you to our standard terms and conditions which incorporate details of our Quality Standards Control & Statement on Limitation of Liability/ Publication.

## 2.0 Summary Table

Appraisal Input	GE	BPS	Comments
Income			
Private Sales Values	£31,000,000	£32,705,000	Disagree
Affordable Housing Values	£3,414,707	£3,514,297	Disagree (marginal difference)
Office Values	£345,953,622	£345,953,622	Agree
Retail Values	£13,657,098	£13,657,098	Agree
Expenditure			
Build Costs	£196,089,000	£196,089,000	Accepted – subject to review.
Contingency	5%	5%	Agree
Professional Fees	10%	10%	Agree
CIL	£2,349,677	£2,741,644	Ambiguous – different figure in GE report.
S106	£2,000,000	£3,500,000	Ambiguous – different figure in GE report.
Purchaser's Costs	6.8%	6.8%	Agree
Residential Disposal Fees	3%	3%	Agree
Letting Agent & Legal Fees	15%	15%	Agree
Office Void Costs	£4,525,444	£4,525,444	Agree
Third Party Costs	£1,065,000	£1,065,000	Agree
Finance	6.5%	6.5%	Agree
Profit Target on GDV	15.12%	15.13%	Agree
Benchmark Land Value	£49,801,000	£49,801,000	Agree
Viability Position			
Surplus/Deficit	-£33,549,227	-£34,171,349	
Net Profit (on GDV)	6.61%	6.50%	

## 3.0 Conclusions And Recommendations

- 3.1 We have reviewed the FVA prepared by Gerald Eve on behalf of the Applicant which concludes that the proposed scheme generates a deficit of **-£33.5 million** (unviable) and therefore no additional affordable housing contributions can be viably provided.
- 3.2 Despite the viability deficit identified, GE state that the Applicant is proposing to deliver 11 affordable dwellings (50% based on GIA) and a CIL and S106 contributions package.

### Benchmark Land Value

- 1.1 GE have not provided an updated assessment of the BLV. In the interest of reaching agreement GE have now accepted our January 2023 position of £49.8 million.

### Development Value

- 3.3 The scheme remains largely unchanged from the previous application we assessed. GE have adopted the previously agreed GDV inputs and have applied them to the amended scheme areas. In the most part we consider this approach to be reasonable. We have however adjusted the private sales values by HPI and the shared ownership values.

### Development Costs

- 3.4 Our Cost Consultant, (GBA), have reviewed the Cost Plan for the proposed scheme prepared by G&T, dated April 2023, and concludes that the costs can be accepted but on the basis that the scheme is subject to viability reviews.
- 3.5 We have reviewed the other cost outlined within the FVA and consider them to be broadly reasonable. We request that the CIL and S106 figures are confirmed as GE include different figures within their appraisal and report.

### Appraisal Results & Recommendations

- 3.6 We have been provided with a live version of the Argus appraisal included in GE's report to which we have applied our amendments. These amendments are outlined in the table included at Section 2.
- 3.7 After these changes our appraisal generates the following:

Profit Output	Profit Target	Deficit
£25,712,367 6.50% on GDV	£59,883,716 15.13% on GDV	<b>-£34,171,349</b>

- 3.8 On this basis we calculate that the scheme would not be able to provide any further affordable housing contributions at this stage.
- 3.9 We note that we have identified a marginally higher deficit than GE which is due to our appraisal having higher CIL and S106 contributions. We require confirmation of these figures before we are able to confirm the level of deficit.
- 3.10 We recommend that the scheme is subject to open book pre-implementation, phased and late stage reviews so that the viability can be assessed over the lifetime of the scheme. This is particularly important given the level of deficit identified which would lead us to question the deliverability of the scheme. We also consider there to be scope for value and rental growth which could improve viability and would be captured at the review stages.

#### Sensitivity Testing/Growth Modelling

- 3.11 We have run the appraisal with a lower build costs for Vine Lane and High Holborn in line with our Cost Consultant's assessment using upper quartile BCIS rates. See the cost report at Appendix 1 for further detail. If the lower costs are included within the appraisal the profit output increases to 9.5% on GDV but this remains below the profit target of 15.13%.
- 3.12 We have prepared growth modelling on the office rents which indicates that the rents would need to increase by 2.75% each year in order for the scheme to become viable.

## 4.0 Principles Of Viability Assessment

- 4.1 Development appraisals work to derive a residual value. This approach can be represented by the formula below:

$$\begin{aligned} &\text{Gross Development Value} - \text{Development Costs (including Developer's Profit)} \\ &= \text{Residual Value} \end{aligned}$$

- 4.2 The residual value is then compared to a benchmark land value. Existing Use Value (EUV) and Alternative Use Value (AUV) are standard recognised approaches for establishing a land value as they help highlight the apparent differences between the values of the site without the benefit of the consent sought.
- 4.3 The rationale for comparing the scheme residual value with an appropriate benchmark is to identify whether it can generate sufficient money to pay a realistic price for the land whilst providing a normal level of profit for the developer. In the event that the scheme shows a deficit when compared to the benchmark figure the scheme is said to be in deficit and as such would be unlikely to proceed.
- 4.4 Development appraisals can also be constructed to include a fixed land value and fixed profit targets. If an appropriate benchmark is included as a fixed land value within a development appraisal this allows for interest to be more accurately calculated on the Benchmark Land Value, rather than on the output residual value. By including fixed profit targets as a cost within the appraisal, programmed to the end of development so as not to attract interest payments, the output represents a 'super' profit. This is the profit above target levels generated by the scheme which represents the surplus available towards planning obligations
- 4.5 This Viability Review report adheres to the RICS Professional Statement on Financial Viability in Planning: Conduct and Reporting (published May 2019). In accordance with this Statement, Section 8 below incorporates details of our Quality Standards Control & Statement on Limitation of Liability/ Publication. This report has been prepared according to the Professional Statement's requirement for objectivity and impartiality, without interference and with reference to all appropriate available sources of information. Where information has not been obtainable, we have stated this expressly in the body of the report.

## 5.0 Benchmark Land Value

### The Previous Benchmark Positions

- 5.1 The Benchmark Land Value has remained a point of dispute since our initial viability review in January 2022. As demonstrated by our most recent January 2023 report, the gap between our respective site values was narrowed with GE reporting a value of £58.1 million and BPS determining a value of £49.8 million.
- 5.2 As of January 2023, the remaining points of dispute were the Existing Use Value of the car park and the Alternative Use Value of the hotel. The other elements of the BLV were agreed as of January 2023.

### Current Benchmark Position

- 5.3 In their latest assessment, GE have not provided an updated position on the BLV for us to review. They state that whilst both parties are adrift on some elements, they are willing to accept our January 2023 position of £49.8 million in the interests of reaching agreement.
- 5.4 On this basis we have maintained our January 2023 BLV position of £49.8 million.
- 5.5 We reserve the right to revisit this following receipt of an up to date BLV assessment from the Applicant.

## 6.0 Development Values

6.1 The proposed scheme comprises of 44 residential dwellings (incl. 19 affordable), 17,943 sqft (NIA) of flexible commercial space presented as retail units and 169,069 sq ft (NIA) of office space.

### Private Residential Values

6.2 15 units are proposed to be for private sale. GE advise that the private residential units within the Vine Lane and High Holborn blocks remain unchanged from the previous scheme. However, there have been some revisions to accommodation in the West Central Street block.

6.3 We have summarised GE's values as follows:

Block	NIA Sqft	No. Units	GDV
West Central St	2,723	2	£3,950,000
High Holborn	3,122	4	£5,420,000
Vine Street	11,603	19	£21,630,000
<b>Total:</b>	<b>17,448</b>	<b>25</b>	<b>£31,000,000 (£1,777 psf)</b>

6.4 GE have adopted the previously agreed sales values for units within the unchanged blocks, i.e., Vine Lane and High Holborn. GE have not provided any more recent evidence.

6.5 We note that the House Price Index indicates that flat values in Camden have increased by 5.5% between January 2023 and April 2023 (latest data available). We have not identified any more recent new build sales evidence since our previous report dated January 2023.

6.6 Moreover, the accommodation in the West Central St block has been reduced to 2 dwellings, both of which are 2 bed apartments and measure 1,140 sqft and 1,582 sqft respectively.

6.7 Given this change in accommodation GE have sought advice from CBRE in regard to the pricing of these units. CBRE have recommended a value of £1,700,000 (£1,492 psf) for the smaller unit and £2,250,000 (£1,422 psf) for the larger unit. No comparable evidence or analysis has been provided in support of these values.

6.8 Based on the evidence available and the prices previously agreed on the smaller 2b3p units on site, we consider the values proposed by CBRE to be understated. CBRE's values also suggest that the 3b4p dwelling at High Holborn is underpriced also.

6.9 If the previously agreed values and those recommend by CBRE were increased by 5.5%, in line with HPI, the overall GDV would be £32,705,000 (£1,874 psf). We have adopted this as the revised private residential GDV.

- 6.10 We recommend that the private sales values are kept under review as more sales evidence becomes available. We also consider the potential for higher values to be achieved noting that the costs for the scheme allow for a luxury/high specification.

#### Affordable Residential Values

- 6.11 The proposed scheme includes 19 affordable dwellings which will include 11 x Low Cost Rent units and 8 x Intermediate units. This equates to an affordable housing contribution of 50% based on overall GIA, or 43% based on unit number.
- 6.12 The average values for the affordable units were previously agreed between us and GE at £182 psf for the LCR units and £350 psf for the intermediate units. GE have maintained these average values within their updated appraisal.
- 6.13 We have provisionally accepted the LCR value of £182 psf, but this is pending confirmation of the rent levels assumed by GE. We have adjusted the intermediate values to £370 psf (+5.5%) to reflect our increases to the private sales values.
- 6.14 We request that any formal RP offers are provided to us to support the values assumed by GE. We also recommend that the Council secure the affordable rent levels in the S106 Agreement.

#### Office Valuation

- 6.15 The proposed scheme includes 169,070 sqft (NIA) of office space in the 1 Museum Street building, and this remains unchanged from the previous planning application.
- 6.16 GE have applied the previously agreed valuation assumptions to the proposed office space. This includes rent levels between £89.39 - £95.82 psf, a 33-month rent/void and 4.25% yield. No updated assessment or evidence is included within GE's report.



6.17 We have conducted research and have not identified any more recent office transactions on the EGI Database. We have also referred to the Savills West End Office Market Watch (May 2023) which notes the following April 2023 transactions:

Address	Floor/s	Sq ft	Grade	Rent achieved	Tenant	Lessor
80 Strand. WC2	Part 3	25,000	A	£75.00	Samsung	Standbrook
Grain House. 30-35 Drury Lane. WC2	Part 1 & 2	24,783	A	£86.25	Puig	Hines
The Point. 37 North Wharf Road. W2	6	23,228	A	£80.00	Alpha FX	Tishman Speyer
60 Charlotte Street. W1	1	11,997	A	£91.00	Coremont	Westbrook Partners
Bravington House. 2 Bravingtons Walk. N1	LG-2	10,718	A	£77.50	InHealth	Nan Fung Group

Source: Savills Research

6.18 Based on the evidence assessed to date we consider it reasonable to adopt the previously agreed rental levels from our January 2023 assessment. We also maintain the agreed rent free/void period.

6.19 We have identified the following more recent office investment transactional evidence on EGI:

- 27 Soho Square, W1D – 31,000 sqft sold June 2023 for £45 million reflecting NIY of 4%.
- 33 Foley Street, W1W – 42,199 sqft sold May 2023 for £82 million reflecting NIY of 4.42%. Annual income of £3.875 million. Purchased by Pontegadea.

6.20 We have also referred to the latest Knight Frank Investment Yield Guide (July 2023) which indicates that West End Prime Core office yields are at 4% and Non-core yields are at 4.50% - 4.75% (weaker market sentiment).

6.21 Overall, we have maintained the agreed yield of 4.25% within our appraisal. We recommend that this element of the scheme is subject to open book reviews noting the significant impact that the GDV of the office space has on the overall viability of the scheme.

#### Flexible Commercial Valuation (Retail Units)

6.22 The proposed scheme includes 16,684 sqft (NIA) of flexible commercial (Class E) floorspace which is arranged across the Museum Street, West Central Street, High Holborn, and Vine Lane blocks as retail/leisure units.

- 6.23 GE advise that the accommodation remains unchanged from the previous application with the exception of the West Central Street block whereby the NIA has increased from 5,468 sqft to 6,803 sqft.
- 6.24 GE have applied the previously agreed valuation assumptions to the proposed commercial space. This includes rent levels between £35 - £50 psf, a 30-month rent/void and 4.25% yield. No updated assessment or evidence is included within GE's report.
- 6.25 We have conducted research and have not identified any more recent letting transactions within the immediate area that would lead us to revise the previously agreed rents. We also maintain the agreed rent free/void period.
- 6.26 We have not identified any further investment transactions that have taken place since our previous assessment in January 2023. Overall, we have maintained the agreed yield of 4.25% within our appraisal.

## 7.0 Development Costs

### Construction Costs

7.1 Our Cost Consultants, Geoffrey Barnett Associates (GBA), have analysed the build cost plan for the proposed scheme prepared by G&T, dated April 2023, and conclude that:

*We conclude that proposed overall construction costs can be accepted as they reflect the technical challenges of the project and the highest level of finishes and assume that this proposed level of finishes and fit-out will be reflected in achievable sales values. However, it would be advisable to reassess construction costs upon completion of the project with the evidence of actual costs incurred.*

7.2 GBA's full cost report can be found at Appendix 1.

### Additional Costs

7.3 GE have applied the following additional cost assumptions:

- Professional fees of 10%
- Marketing fees of 1.5%
- Sales agent fees of 1.0%
- Sales legal fees of 0.5%
- Letting agent fee of 10%
- Letting legal fee of 5%
- Purchaser's costs of 6.8%

7.4 Generally, we accept that these percentages are realistic and in line with market norms.

### Planning Contributions

7.5 GE's report includes CIL at £2,741,644 and S106 contributions at £3,500,000. We have not verified these figures and request confirmation from the Council as to the required sums.

7.6 We note that GE's appraisal includes different CIL and S106 figures at £2,349,677 and £2,000,000 respectively. We assume that this is an error but request clarity on this matter.

### Third Party Costs

7.7 GE have included third party costs at £1,065,000 within their appraisal. This is in line with our position outlined in our earlier January 2023 review. We have not been provided with any further information that would indicate that our previous position needs to be altered. We have

therefore maintained this figure within our appraisal. Such costs should be subject to an open book review process.

#### Office Void Costs

- 7.8 Given that the office space remains unchanged from the previous application, GE have included the previously agreed void cost of £4,525,444. We consider this broadly reasonable but recommend that the void cost is subject to open book reviews.

#### Finance

- 7.9 Finance has been included at 6.5% assuming that the scheme is 100% debt financed. We consider this finance allowance to be reasonable and in line with the rate previously agreed.

#### Profit

- 7.10 The developer profit target adopted by GE is 17.5% on GDV for the private residential element, 15% for the commercial and 6% for the affordable. These profit targets are in line with the levels previously agreed in January 2023. We maintain that these profit targets remain appropriate.

#### Development Timeframes

- 7.11 GE's report does not provide any update on the development timescales. Given that the proposals remain largely unchanged from the previous application, we assume that the timescales will be relatively consistent with those previously agreed in January 2022 and 2023.
- 7.12 We reserve the right to revisit the development timescales upon receipt of a detailed construction programme.

## 8.0 Author Sign Off

- 8.1 This report is provided for the stated purpose and for the sole use of the named clients. This report may not, without written consent, be used, or relied upon by any third party.
- 8.2 The author(s) of this report confirm that there are no conflicts of interest and measures have been put in place to prevent the risk of the potential for a conflict of interest. In accordance with the RICS Professional Statement *Financial Viability in Planning: Conduct and Reporting* September 2019, this report has been prepared objectively, impartially, and with reference to all appropriate sources of information.
- 8.3 The following persons have been involved in the production of this report:



Madison Thomas MRICS  
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For and on behalf of  
BPS Chartered Surveyors



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27<sup>th</sup> July 2023

# Appendix 1: Build Cost Report

**REVIEW OF COST MODEL REV 1 (STAGE 2)  
PREPARED BY  
GARDINER & THEOBALD**

**FOR**

**SELKIRK HOUSE AND WEST CENTRAL STREET BUILDINGS,  
MUSEUM STREET, LONDON**

**21 JULY 2023**

**Geoffrey Barnett Associates**

*Chartered Quantity Surveyors  
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## **1.0 INTRODUCTION:**

- 1.1 Geoffrey Barnett Associates are Chartered Quantity Surveyors, established in 1974, and have over 45 years' experience of providing quantity surveying, project co-ordination and construction cost management services to clients throughout the UK. The firm's experience covers a wide range of project types and sizes including new build residential and commercial developments, infrastructure projects and refurbishment projects.
- 1.2 This review relates to the Cost Model Rev 1 (Stage 2) dated April 2023 produced by Gardiner & Theobald for:
- Museum Street – Office Tower Project
  - High Holborn Residential Block
  - Vine Lane Office Block (Grape Street)
  - West Central Street – Residential Block with Commercial
  - Site Wide Works and Infrastructure

## **2.0 BASIS OF REVIEW**

- 2.1 The contract build cost estimate provided by the applicant is reviewed by comparison against the Building Cost Information Service (BCIS) construction cost data published by the RICS. The reason for using the BCIS service is that it provides a UK wide and fully independent database compiled and continually updated by input from varied project types and locations.
- 2.2 BCIS publish costs as average overall prices on a cost per sq metre basis and an elemental cost per sq metre basis for new build work. For new build construction, the BCIS cost levels are used as a baseline to assess the level of cost and specification enhancement in the scheme on an element by element basis.
- 2.3 BCIS costs are updated on a quarterly basis. The most recent quarters use forecast figures, the older quarters are firm costs based on historic project data. The BCIS also provides a location adjustment facility against a UK mean index of 100, which allows adjustment of costs for any location in the UK. The BCIS also publish a Tender Price Index based on historic tender prices. This allows adjustment of costs on a time basis where necessary.
- 2.4 BCIS average costs are available for various categories of buildings such as apartments, offices, shops, hotels, schools, etc.
- 2.5 BCIS average prices per sq metre include overheads and profit (OHP) and preliminaries costs. BCIS elemental costs include OHP but not preliminaries. Average prices per sq metre or elemental costs do not include for external services and external works costs. Demolitions and site preparation are excluded from all BCIS costs.
- 2.6 Ideally, a contract build cost estimate should be prepared by the applicant in the BCIS elements. If this is not available exactly in the BCIS format then, where relevant, we undertake analysis and adjustment to allow direct comparison to BCIS elemental benchmark costs. This requires access to the drawings, specifications, and any reports which have a bearing on cost.

- 2.7 The review of an applicant's contract build cost estimate against BCIS would typically require:
- Adjustment by location factor
  - Adjustment for abnormal and enhanced costs
  - Review of the applicants estimate on element by element basis
  - More detailed analysis where there are significant deviance from BCIS costs
  - Adjustment of overheads & profit inclusions to provide direct comparison to BCIS
  - Addition of contractors' preliminaries costs
  - Addition of ancillary costs, such as fees, statutory charges, etc., as appropriate

These adjustments enable us to make a direct comparison with BCIS benchmark costs.

- 2.8 The floor areas stated in the applicants cost estimate are accepted and we do not attempt to check the floor areas.

### **3.0 REVIEW OF COST MODEL – SUMMARY OF THE SCHEME**

- 3.1 We have previously twice assessed schemes on this site in September 2021 and January 2023. Since last assessment the scheme has been revised with marginal decrease in GIA by 87m<sup>2</sup> and the number of residential units by 4 units in the West Central Street buildings due to recent listing of 10-12 Museum Street and 35-37 New Oxford Street.
- 3.2 The proposed development is stated to comprise in the planning application "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 part-demolition and refurbishment 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".
- 3.3 Total GIA is stated in the cost model to be 31,087m<sup>2</sup> (excluding the area of site wide works and infrastructure), which concurs with the appraisal summary. The breakdown of area is as follows:-

Museum Street – Office Tower / Commercial	24,185m <sup>2</sup>
High Holborn - Resi/ Commercial	486m <sup>2</sup>
Vine Lane/Grape Street - Resi/ Commercial	3,018m <sup>2</sup>
West Central Street – Resi/commercial	<u>3,398m<sup>2</sup></u>
<b>Total</b>	<b><u>31,087m<sup>2</sup></u></b>

It should be noted that a different total GIA of 28,309m<sup>2</sup> (excluding the area of site wide works and infrastructure) is shown in the Area Schedule 13.1. Appendix 1) of the Design and Access Statement. We have used the GIA of 31,087m<sup>2</sup> in our assessment of costs.

- 3.4 Construction costs are shown in the cost model to be £196,000,000 (excluding fees, inflation to mid-point and direct orders (loose FF&E)) in total. The breakdown of costs is as follows:-

Museum Street – Office Tower	£94,200,000
High Holborn - Resi/ Commercial	£3,100,000
Vine Lane/Grape Street - Resi/ Commercial	£16,800,000
West Central Street – Resi/commercial	£17,200,000
Site Wide Works	<u>£9,600,000</u>
Preliminaries 15% (rounded)	£20,600,000
OHP 5% (rounded)	<u>£8,300,000</u>
Sub-total	£169,800,000
Inflation 1Q21 to 2Q23 – 15.5% (rounded)	<u>£26,200,000</u>
<b>Total</b>	<b><u>£196,000,000</u></b>

However, a different construction cost of £205,893,450 is included in the appraisal summary, which includes the above costs from the cost model and 5% contingency added to them. We have assessed our costs against the sum of £205,893,450.

- 3.5 Date basis for the costs is stated to be 2Q2023.
- 3.6 Costs are presented in an elemental summary and quantified breakdown.
- 3.7 The cost model includes preliminaries at 15% and overheads and profit at 5%. As has been mentioned above, contingency has been added on the appraisal summary at 5%.
- 3.8 It should be noted that the proposed scheme is unusual in its size, technical challenges and extremely high level of finishes, fixtures and fittings. In addition, two buildings have recently received the status of Grade II listed. BCIS data does not have enough samples to support the proposed exceptionally high level of quality, which can be assumed from the proposed individual rates used in the cost model. Given the prime location of the scheme we assume that the proposed exceptionally high standard of finishes when reflected in the construction costs can be justified by the corresponding high market value of the final product.
- 3.9 In order to address the above challenges, we made a comparative assessment of the Applicant’s proposed costs against BCIS cost data, using Upper Quartiles rates. This produced an inconsistent result with the Museum Street Office Tower and West Central Street Residential Block both falling within acceptable estimating margins, and the High Holborn Residential Block and Grape Street / Vine Lane Residential & Commercial Block both appearing to show that the Applicant’s costs for both these two blocks are higher than BCIS Upper Quartiles rates.  
In view of this inconsistent result and the apparent limited number of cost samples of developments comprising exceptionally high quality finishing fixtures and fittings it was decided to carry out a further comparison of the Applicant’s proposed costs against BCIS “Highest” rates to see how the Applicant’s costs compared.

#### **4.0 REVIEW OF COST MODEL – MUSEUM STREET OFFICE TOWER**

4.1 Total GIA is stated in the cost model to be 24,185m<sup>2</sup>, which concurs with the GIA shown in the appraisal summary. The breakdown of areas is as follows:

Offices	23,552m <sup>2</sup>
Commercial	<u>633m<sup>2</sup></u>
<b>Total</b>	<b><u>24,185m<sup>2</sup></u></b>

4.2 Construction costs are shown in the cost model to be £137,865,000 (excluding fees, inflation to mid-point and with added contingency of 5%) in total, which concurs with appraisal summary. The breakdown of costs is as follows:-

Facilitating works	£6,500,000
Build costs	£87,000,000
External works	£700,000
Preliminaries 15%	£14,100,000
OHP 5%	<u>£5,400,000</u>
Sub-total	£113,700,000
Inflation 1Q21 to 2Q23 – 15.5%	£17,600,000
Contingency 5%	<u>£6,565,000</u>
<b>Total</b>	<b><u>£137,865,000</u></b>

4.3 Date basis for the costs is stated to be 2Q2023.

4.4 Costs are presented in an elemental summary and partially quantified breakdown.

4.5 The cost model includes preliminaries at 15% and overheads and profit at 5%. As has been mentioned above, contingency has been added on the appraisal summary at 5%.

#### **5.0 GBA ASSESSMENT OF CONSTRUCTION COSTS – MUSEUM STREET OFFICE TOWER**

5.1 To benchmark the figures in the cost model, we have calculated costs using BCIS average m<sup>2</sup> rates. These rates relate to buildings only, so we have added allowances for external works, plus any abnormal – see following clauses.

5.2 Date basis for the costs is 3Q2023.

5.3 We have used upper quartiles BCIS rates rebased to Camden and enhanced to reflect high rise building.

5.4 We have reviewed the costs in the cost model for costs that are excluded from BCIS rates (demolition & facilitating works and external works and services). On the whole we consider them to be reasonable and we have therefore used them in our assessment.

5.5 We have also reviewed the cost model in detail to see if there are any abnormal costs that we feel would not be included in BCIS rates. We conclude that the following could be considered as abnormal:

- EO for double height basement
- EO for piled foundations
- Enhanced elevational treatment
- Sprinkler system
- BMS

- 5.7 It should be noted that the cost model includes lump sums totalling £1,600,000 for enhancement to finishes, artwork, statues, feature lighting and fittings and additional risk allowance at £726,910 associated with development of the steel frame and increase in cost of steel raw material and fabrication. There is no substantiation to the proposed lump sums and proposed risk allowance is over and above the 5% already included.
- 5.6 We have not applied prelims and overheads and profit to additional costs as both BCIS rates and additional & abnormal costs are inclusive of them.
- 5.7 In line with common practice and general guidance we have added an allowance of 5% for contingency.
- 5.8 On the basis of the foregoing we have calculated a total construction cost of £132,748,054 – see Appendix E.

## **6.0 CONCLUSION – MUSEUM STREET OFFICE TOWER**

- 6.1 The difference between costs in the cost model and our assessment of costs using BCIS is £5,116,946 or 3.71% - see Appendix F.
- 6.2 We conclude that the construction costs put forward in the cost model are within acceptable estimating margins of our own assessment of costs.

## **7.0 REVIEW OF COST MODEL – HIGH HOLBORN RESIDENTIAL BLOCK**

- 7.1 Total GIA is stated in the cost model to be 486m<sup>2</sup>, which concurs with the appraisal summary. The breakdown of areas is as follows:-

Flats	463m <sup>2</sup>
Retail / substation	<u>23m<sup>2</sup></u>
<b>Total</b>	<b><u>486m<sup>2</sup></u></b>

- 7.2 Construction costs are shown in the cost model to be £4,515,000 (excluding fees, inflation to mid-point and with added contingency of 5%) in total. The breakdown of costs is as follows:-

Facilitating works	£100,000
Build costs	£2,900,000
External works	£100,000
Preliminaries 15%	£500,000
OHP 5%	<u>£200,000</u>

Sub-total	£3,800,000
Inflation 1Q21 to 2Q23 – 15.5%	£500,000
Contingency 5%	<u>£215,000</u>
<b>Total</b>	<b><u>£4,515,000</u></b>

However, a marginally different construction cost of £4,608,450 is included in the appraisal summary, which includes the above costs from the cost model (with presumably rectification of the computing error) and 5% contingency added to them. We have assessed our costs against the sum of £4,608,450.

- 7.3 Date basis for the costs is stated to be 2Q2023.
- 7.4 Costs are presented in an elemental summary and partially quantified breakdown.
- 7.5 The cost model includes preliminaries at 15% and overheads and profit at 5%. As has been mentioned above, contingency has been added on the appraisal summary at 5%.

**8.0 GBA ASSESSMENT OF CONSTRUCTION COSTS – HIGH HOLBORN RESIDENTIAL BLOCK**

- 8.1 To benchmark the figures in the cost model, we have calculated costs using BCIS average m2 rates. These rates relate to buildings only, so we have added allowances for external works, plus any abnormal – see following clauses.
- 8.2 Date basis for the costs is 3Q2023.
- 8.3 We have used upper quartiles BCIS rates rebased to Camden.
- 8.4 We have reviewed the costs in the cost model for costs that are excluded from BCIS rates (demolition & facilitating works and external works and services). On the whole we consider them to be reasonable and we have therefore used them in our assessment.
- 8.5 We have also reviewed the cost model in detail to see if there are any abnormal costs that we feel would not be included in BCIS rates. We conclude that the following could be considered as abnormal:
  - Works to existing substructures, including vibration isolation
  - Green roof / edge protection
  - Enhanced kitchens and bathrooms
  - AOV and vent for UKPN
  - Enhanced elevational treatment
  - High external walls:floor area ratio
  - Façade lighting
- 8.6 We have not applied prelims and overheads and profit to additional costs as both BCIS rates and additional & abnormal costs are inclusive of them.

8.7 In line with common practice and general guidance we have added an allowance of 5% for contingency.

8.8 On the basis of the foregoing we have calculated a total construction cost of £ £3,080,525 – see Appendix G.

## **9.0 CONCLUSION – HIGH HOLBORN RESIDENTIAL BLOCK**

9.1 The difference between costs in the cost model and our assessment of costs using BCIS is £1,527,925 or 33.15% - see Appendix H.

9.2 We conclude that the construction costs put forward in the cost model are £1,527,925 or 33.15% higher than we consider to be reasonable.

## **10.0 REVIEW OF COST MODEL – GRAPE STREET / VINE LANE RESIDENTIAL & COMMERCIAL**

10.1 Total GIA is stated in the cost model to be 3,018m2. The breakdown of areas is as follows:-

Residential	2,699m2
Commercial	<u>319m2</u>
<b>Total</b>	<b><u>3,018m2</u></b>

10.2 Construction costs are shown in the cost model to be £24,570,000 (excluding fees, inflation to mid-point and with added contingency of 5%) in total, which concurs with appraisal summary. The breakdown of costs is as follows:-

Facilitating works	£1,000,000
Build costs	£15,400,000
External works	£400,000
Preliminaries 15%	£2,500,000
OHP 5%	<u>£1,000,000</u>
Sub-total	<u>£20,300,000</u>
Inflation 1Q21 to 2Q23 – 15.5%	£3,100,000
Contingency 5%	<u>£1,170,000</u>
<b>Total</b>	<b><u>£24,570,000</u></b>

10.3 Date basis for the costs is stated to be 2Q2023.

10.4 Costs are presented in an elemental summary and partially quantified breakdown.

10.5 The cost model includes preliminaries at 15% and overheads and profit at 5%. As has been mentioned above, contingency has been added on the appraisal summary at 5%.



**11.0 GBA ASSESSMENT OF CONSTRUCTION COSTS – GRAPE STREET / VINE LANE RESIDENTIAL & COMMERCIAL**

11.1 To benchmark the figures in the cost model, we have calculated costs using BCIS average m2 rates. These rates relate to buildings only, so we have added allowances for external works, plus any abnormals – see following clauses.

11.2 Date basis for the costs is 3Q2023.

11.3 We have used upper quartiles BCIS rates rebased to Camden.

11.4 We have reviewed the costs in the cost model for costs that are excluded from BCIS rates (demolition & facilitating works and external works and services). On the whole we consider them to be reasonable and we have therefore used them in our assessment.

11.5 We have also reviewed the cost model in detail to see if there are any abnormal costs that we feel would not be included in BCIS rates. We conclude that the following could be considered as abnormal:

- Works to existing and new substructure (2 levels of basement)
- Piled foundations
- High external walls:floor area ratio
- Enhanced elevational treatment
- Sprinkler system
- ASHP
- Acoustic louvre to ASHP and galvanized steelwork for plant support
- MVHR
- Enhanced kitchens and bathrooms
- External walkways
- Temporary propping to Grape Street
- Green roof
- Blue roof system
- Sign to the building façade including lighting

11.6 We have not applied prelims and overheads and profit to additional costs as both BCIS rates and additional & abnormal costs are inclusive of them.

11.7 In line with common practice and general guidance we have added an allowance of 5% for contingency.

11.8 On the basis of the foregoing we have calculated a total construction cost of £15,789,840 – see Appendix I.

**12.0 CONCLUSION – GRAPE STREET / VINE LANE RESIDENTIAL & COMMERCIAL**

12.1 The difference between costs in the cost model and our assessment of costs using BCIS is £8,780,160 or 35.74% - see Appendix J.

- 12.2 We conclude that the construction costs put forward in the cost model are £8,780,160 or 35.74% higher than we consider to be reasonable.

### **13.0 REVIEW OF COST MODEL – WEST CENTRAL STREET**

- 13.1 Total GIA is stated in the cost model to be 3,398m<sup>2</sup>, which concurs with the appraisal summary. The breakdown of areas is as follows:-

Commercial	692m <sup>2</sup>
Residential	<u>2,706m<sup>2</sup></u>
<b>Total</b>	<b><u>3,398m<sup>2</sup></u></b>

- 13.2 Construction costs are shown in the cost model to be 24,780,000 (excluding fees, inflation to mid-point and with added contingency of 5%) in total, which concurs with appraisal summary. The breakdown of costs is as follows:-

Facilitating works	£4,400,000
Build costs	£12,000,000
External works	£800,000
Preliminaries 15%	£2,100,000
OHP 5% (rounded)	<u>£1,100,000</u>
Sub-total	£20,400,000
Inflation 1Q21 to 2Q23 – 15.5%	£3,200,000
Contingency 5%	<u>£1,180,000</u>
<b>Total</b>	<b><u>£24,780,000</u></b>

- 13.3 Date basis for the costs is stated to be 2Q2023.
- 13.4 Costs are presented in an elemental summary and partially quantified breakdown.
- 13.5 The cost model includes preliminaries at 15% and overheads and profit at 5%. As has been mentioned above, contingency has been added on the appraisal summary at 5%.

### **14.0 GBA ASSESSMENT OF CONSTRUCTION COSTS – WEST CENTRAL STREET**

- 14.1 To benchmark the figures in the cost model, we have calculated costs using BCIS average m<sup>2</sup> rates. These rates relate to buildings only, so we have added allowances for external works, plus any abnormal – see following clauses.
- 14.2 Date basis for the costs is 2Q2023.
- 14.3 We have used upper quartiles BCIS rates rebased to Camden.
- 14.4 We have reviewed the costs in the cost model for costs that are excluded from BCIS rates (facilitating works and external works and services). On the whole we consider them to be reasonable and we have therefore used them in our assessment. We have used the cost of works to existing buildings with omission of risk allowance (as it is in addition to 5% allowed for the project) and provisional allowance for upgrade to existing façade.

14.5 We have also reviewed the cost model in detail to see if there are any abnormal costs that we feel would not be included in BCIS rates. We conclude that the following could be considered as abnormal:

- Works to substructure associated with demolition, alteration and temporary works
- Strengthening and repairs to existing frame and upper floors
- Balconies / external walkways - upper floors
- Balconies
- Green roof and edge protection
- Enhancement to kitchens and bathrooms
- Enhanced elevational treatment
- Sprinkler system
- Air-conditioning and MVHR
- ASHP

14.6 We have not applied prelims and overheads and profit to additional costs as both BCIS rates and additional & abnormal costs are inclusive of them.

14.7 In line with common practice and general guidance we have added an allowance of 5% for contingency.

14.8 On the basis of the foregoing we have calculated a total construction cost of £24,258,276 – see Appendix K.

## **15.0 CONCLUSION – WEST CENTRAL STREET**

15.1 The difference between costs in the cost model and an assessment of costs using BCIS is £521,724 or 2.11% - see Appendix L.

15.2 We conclude that the construction costs put forward in the cost model are within acceptable estimating margins of our own assessment of costs.

## **16.0 CONCLUSION – SUMMARY OF THE SCHEME**

16.1 On the basis of the foregoing we have calculated a total construction cost of £189,946,695 using BCIS upper Quartiles Rates – see Appendix A.

16.2 The difference between costs in the cost model and our assessment of costs using BCIS Upper Quartiles is £15,946,755 or 7.75% - see Appendix B. Taking into consideration that a cost difference within 5% would have been considered within acceptable estimating margins of our own assessment of costs using BCIS rates we consider that proposed costs are 2.75% higher than would be acceptable using BCIS Upper Quartiles rates.

16.3 We can accept the costs for the Office Tower and West Street Central, which are within 5% of our costs using BCIS rates, but we have struggled to justify the costs for other two blocks if we used Upper Quartiles BCIS rates. The difference in cost on these blocks lies

predominantly in basements, external walls and fit out costs. We acknowledge, however, that the scheme is aiming to achieve the highest quality of finishes.

- 16.4 We have therefore made an alternative assessment of the cost using the Highest BCIS rates, which are the highest cost listed by BCIS from all the comparable samples available. By applying the Highest BCIS rates, which in our opinion will be inclusive of majority of previously identified abnormal costs, we have calculated a total construction cost of £264,778,251 – see Appendix C. The difference between costs in the cost model and our assessment of costs using Highest BCIS is £58,884,801 or 28.60% - see Appendix D. It shows that the Highest BCIS rates have significantly increased since the time of our previous assessment and proposed construction costs overall are slightly higher than Upper Quartiles BCIS rates but well below Highest BCIS rates.
- 16.5 We conclude that proposed overall construction costs can be accepted as they reflect the technical challenges of the project and the highest level of finishes and assume that this proposed level of finishes and fit-out will be reflected in achievable sales values. However, it would be advisable to reassess construction costs upon completion of the project with the evidence of actual costs incurred.

## **17.0 REVIEW OF PROFESSIONAL FEES AND CONSTRUCTION DURATION – SUMMARY**

- 17.1 Professional fees are included at 10%, which is considered to be reasonable.
- 17.2 The Addendum to Financial Viability Assessment does not show the proposed construction duration. Due to relatively minor changes to the scheme we have assumed that a combined duration of 36 months for construction of all blocks (including demolition works) remained the same as was proposed in the FVA. BCIS estimated construction duration is average 21 months with the top of the interval 23 months, individual projects may take up to 31 months. However, as the contract value is close to the limit of the data used to construct the model BCIS advises to use the calculation with caution. Taking into consideration the scale of demolition and complexity of substructure works we consider proposed 36 months for construction works to be reasonable.

**APPENDIX A**

**CALCULATION OF COSTS USING BCIS M2 RATES - SUMMARY**

**Total costs**

Museum Street – Office Tower	App E	£132,748,054
High Holborn Residential Block	App G	£3,080,525
Vine Lane/Grape Street (Residential block)	App I	£15,789,840
West Central Street (Residential + Commercial)	App K	£24,258,276
Site Wide Works (cost from cost plan)		£14,070,000
Total		<u>£189,946,695</u>

**APPENDIX B**

**COMPARISON OF COST PLAN AGAINST COSTS USING BCIS M2 RATES - SUMMARY**

Cost using BCIS m2 rates - Appendix A	£189,946,695
Cost from cost plan	£205,893,450
Difference £	£15,946,755
Difference %	7.75%

**APPENDIX C**

**CALCULATION OF COSTS USING BCIS M2 RATES - SUMMARY (ASSESSMENT WITH USE OF HIGHEST RATES)**

**Total costs**

**Museum Street – Office Tower**

Office (Cat A fit out to top floor)	23,552	m2 @	£7,253 /m2	£170,822,656
Commercial	633	m2 @	£2,914 /m2	£1,844,562

**High Holborn Residential Block**

Flats (6-storey block)	463	m2 @	£7,862 /m2	£3,640,106
Commercial	23	m2 @	£2,914 /m2	£67,022

**Vine Lane/Grape Street (Residential block)**

Flats -19 units (6 storey block)	2,699	m2 @	£7,862 /m2	£21,219,538
Commercial	319	m2 @	£2,914 /m2	£929,566

**West Central Street (Residential + Commercial)**

Commercial	692	m2 @	£2,914 /m2	£2,016,488
Residential - up to 7 storey block 21 units	2,706	m2 @	£7,862 /m2	£21,274,572
Site Wide Works				£14,070,000
<b>Total</b>	<b>31,087</b>		<b>£7,588</b>	<b>£235,884,510</b>

**Additional costs not included in base rates**

Demolition and facilitating works				£13,803,521
External works & services				£2,481,732

**£16,285,253**

Total base and additional costs				£252,169,763
Contingency			5%	£12,608,488

**£264,778,251**

Cost per m2 of GIA £8,517

**Notes:**

1. BCIS rates are Highest, rebased to Camden and current date (3Q2023).
2. BCIS rates are inclusive of prelims and OHP.
3. Site preparation and external works and services costs are taken from Gardiner & Theobald cost model
4. All additional costs are inclusive of preliminaries and overheads and profit.



**APPENDIX D**

**COMPARISON OF COST PLAN AGAINST COSTS USING BCIS M2 RATES - SUMMARY (ASSESSMENT WITH  
USE OF HIGHEST RATES)**

Cost using BCIS m2 rates - Appendix C	£264,778,251
Cost from cost plan	£205,893,450
Difference £	-£58,884,801
Difference %	-28.60%

APPENDIX E

CALCULATION OF COSTS USING BCIS M2 RATES - MUSEUM STREET - OFFICE TOWER

**Base costs based on M2 rates**

*Offices (2 basement floors+GF+18 storeys)	23,552	m2 @	£4,382 /m2	£103,204,864
Flexible commercial	633	m2 @	£2,461 /m2	£1,557,813
Total	<u>24,185</u>			<u>£104,762,677</u>

**Additional costs not included in base rates**

Demolition and facilitating works				£7,836,000
External works & services				£840,000
Sub total				£8,676,000
Inflation from 1Q23 (379) to 3Q23 (385)	1.6%			£138,816
				<u>£8,814,816</u>

**Abnormal costs**

EO for double height basement	917	m2 @	£2,100 /m2	£1,925,700
EO for piled foundations	1,144	m2 @	£260 /m2	£297,440
Enhanced elevational treatment	24,185	m2 @	£315 /m2	£7,618,275
Sprinkler system	24,185	m2 @	£63 /m2	£1,523,655
BMS	24,185	m2 @	£53 /m2	£1,281,805
Sub total				£12,646,875
Inflation from 1Q23 (379) to 3Q23 (385)	1.6%			£202,350
				<u>£12,849,225</u>

Total base and additional costs				£126,426,718
Contingency			5%	£6,321,336
				<u>£132,748,054</u>

Cost per m2 of GIA £5,489

**Notes:**

1. BCIS rates are Upper Quartiles, rebased to Camden and current date (3Q2023).
2. BCIS rates are inclusive of prelims and OHP.
3. \*BCIS rates amended for high rise buildings.
4. Demolition and facilitating works costs and external works and services are taken from Gardiner and Theobald Cost Model.
5. All abnormal costs - GBA own assessments.

**APPENDIX F**

**COMPARISON OF COST PLAN AGAINST COSTS USING BCIS M2 RATES - MUSEUM  
STREET - OFFICE TOWER**

Cost using BCIS m2 rates - Appendix E	£132,748,054
Cost from cost plan	£137,865,000
Difference £	£5,116,946
Difference %	3.71%

**APPENDIX G**

**CALCULATION OF COSTS USING BCIS M2 RATES - HIGH HOLBORN RESIDENTIAL BLOCK**

**Base costs based on M2 rates**

Flats (6-storey block)	463	m2 @	£2,955 /m2	£1,368,165
Commercial	23	m2 @	£2,461 /m2	£56,603
Total	<u>486</u>			<u>£1,424,768</u>

**Additional costs not included in base rates**

Facilitating works				£135,000
External works				£135,000
Sub-total				£270,000
Inflation from 1Q23 (379) to 3Q23 (385)	1.6%			£4,320
				<u>£274,320</u>

**Abnormal costs**

Works to existing substructure, including vibration isolation				£270,000
Green roof / edge protection				£47,500
Enhanced kitchens and bathrooms	4	no @	£12,000 /no	£48,000
AOV and vent for UKPN				£18,000
EO for enhanced elevational treatment	486	m2 @	£1,000 /m2	£486,000
EO for high external walls:floor area ratio	486	m2 @	£300 /m2	£145,800
Façade lighting				£200,000
Sub-total				£1,215,300
Inflation from 1Q23 (379) to 3Q23 (385)	1.6%			£19,445
				<u>£1,234,745</u>

Total base, additional and abnormal costs				£2,933,833
Contingency			5%	£146,692
				<u><u>£3,080,525</u></u>

Cost per m2 of GIA £6,339

**Notes:**

1. BCIS rates are Upper Quartiles, rebased to Camden and current date (3Q2023).
2. BCIS rates are inclusive of prelims and OHP.
3. Site preparation and external works and services costs are taken from Gardiner & Theobald cost model.
4. Abnormal costs - GBA own assessment.
5. All additional and abnormal costs are inclusive of preliminaries and overheads and profit.

**APPENDIX H**

**COMPARISON OF COST PLAN AGAINST COSTS USING BCIS M2 RATES - HIGH HOLBORN  
RESIDENTIAL BLOCK**

Cost using BCIS m2 rates - Appendix G	£3,080,525
Cost from cost plan	£4,608,450
Difference £	£1,527,925
Difference %	33.15%

**APPENDIX I**

**CALCULATION OF COSTS USING BCIS M2 RATES - GRAPE STREET / VINE LANE RESIDENTIAL&COMMERCIAL**

**Base costs based on M2 rates**

Flats -19 units (6 storey block)	2,699	m2 @	£2,955 /m2	£7,975,545
Retail	319	m2 @	£2,461 /m2	£785,059
Total	<u>3,018</u>			<u>£8,760,604</u>

**Additional costs not included in base rates**

Facilitating works				£1,383,143
External works				£349,650
Below ground drainage				£80,000
Sub-total				£1,812,793
Inflation from 1Q23 (379) to 3Q23 (385)	1.6%			£29,005
				<u>£1,841,798</u>

**Abnormal costs**

EO for works to existing and new substructure (2 levels of basement)	430	m2 @	£2,000 /m2	£860,000
EO for piled foundations	430	m2 @	£250 /m2	£107,500
EO for enhanced elevational treatment	3,018	m2 @	£330 /m2	£995,940
EO for high external walls:floor area ratio	3,018	m2 @	£300 /m2	£905,400
EO for sprinkler system	3,018	m2 @	£60 /m2	£181,080
EO for ASHP	3,018	m2@	£75 /m2	£226,350
Acoustic louvre to ASHP and galvanized steelwork for plant support				£250,000
EO for MVHR	19	no@	£2,000 /m2	£38,000
EO for enhanced kitchens and bathrooms	19	no @	£12,000 /no	£228,000
External walkways	167	m2@	£1,200 /m2	£200,400
Temporary propping to Grape Street				£312,000
Green roof	141	m2@	£120 /m2	£16,920
Blue roof system	141	m2@	£100 /m2	£14,100
Sign to the building façade including lighting				£30,000
Sub-total				£4,365,690



Inflation from 1Q23 (379) to 3Q23 (385)	1.6%	£69,851
		<hr/>
		£4,435,541
		<hr/>
Total base, additional and abnormal costs		£15,037,943
Contingency	5%	£751,897
		<hr/>
		<b>£15,789,840</b>
		<hr/> <hr/>
Cost per m2 of GIA	£5,232	

**Notes:**

1. BCIS rates are Upper Quartiles, rebased to Camden and current date (3Q2023).
2. BCIS rates are inclusive of prelims and OHP.
3. Site preparation and external works and services costs are taken from Gardiner & Theobald cost model.
4. Abnormal costs - GBA own assessment.
5. All additional and abnormal costs are inclusive of preliminaries and overheads and profit.

**APPENDIX J**

**COMPARISON OF COST PLAN AGAINST COSTS USING BCIS M2 RATES - GRAPE STREET /  
VINE LANE RESIDENTIAL&COMMERCIAL**

Cost using BCIS m2 rates - Appendix I	£15,789,840
Cost from cost plan	£24,570,000
Difference £	£8,780,160
Difference %	35.74%

**APPENDIX K**

**CALCULATION OF COSTS USING BCIS M2 RATES - WEST CENTRAL STREET**

**Base costs based on M2 rates**

Commercial	692	m2 @	£2,461	/m2	£1,703,012
Residential - up to 7 storey block, 21 units (conversion and new structure)	2,706	m2 @	£4,158	/m2	£11,251,548
Total	<u>3,398</u>				<u>£12,954,560</u>

**Additional costs not included in base rates**

Facilitating works					£1,085,000
Works to existing building including demolition					£3,147,000
External works and services and site wide works					£1,038,000
Sub total					£5,270,000
Inflation from 1Q23 (379) to 3Q23 (385)	1.6%				£84,320
					<u>£5,354,320</u>

**Abnormal costs**

EO for works substructure: works associated with demolitions, alterations and temporary structures.	3,398	m2 @	£350	/m2	£1,189,300
EO for strengthening / repairs to existing structure - frame					£240,000
EO for balconies / external walkways - upper floors					£512,000
EO for green roof / roof play areas and edge protection	342	m2 @	£330	/m2	£112,860
EO for enhanced kitchens and bathrooms	21	no @	£12,000	/no	£252,000
EO for enhanced elevational treatment	3,398	m2 @	£500	/m2	£1,699,000
EO for sprinkler system	3,398	m2 @	£60	/m2	£203,880
Air-conditioning and MVHR	3,398	m2 @	£75	/m2	£254,850
EO for ASHP	3,398	m2 @	£75	/m2	£254,850
Sub total					£4,718,740
Inflation from 1Q23 (379) to 3Q23 (385)	1.6%				£75,500
					<u>£4,794,240</u>

Total base, additional and abnormal costs		£23,103,120
Contingency	5%	£1,155,156
		<hr/>
		<b>£24,258,276</b>
		<hr/> <hr/>
Cost per m2 of GIA	£7,139	

**Notes:**

1. BCIS rates are Upper Quartiles, rebased to Camden and current date (3Q2023).
2. BCIS rates are inclusive of prelims and OHP.
3. Site preparation and external works and services costs are taken from Gardiner & Theobald cost model.
4. Works to existing buildings including demolition are taken from Gardiner & Theobald cost model and revised by GBA.
5. Abnormal costs - GBA own assessment.
6. All additional and abnormal costs are inclusive of preliminaries and overheads and profit.

**APPENDIX L**

**COMPARISON OF COST PLAN AGAINST COSTS USING BCIS M2 RATES - WEST CENTRAL STREET**

Cost using BCIS m2 rates - Appendix K	£24,258,276
Cost from cost plan	£24,780,000
Difference £	£521,724
Difference %	2.11%

APPENDIX M

SUMMARY OF COST COMPARISONS

Block	Type	No of storeys	GIA,m2	Applicant		BCIS						Appendix
						Upper Quartiles			Highest			
						Cost £m	Cost £/m2	Deviation from BCIS	Cost £m	Cost £/m2	Deviation above BCIS	
Museum Street-Office Tower	Office Commercial	21	23,552	£137,865	£5,700	£132,748	£5,489	3.71%				E, F
			633									
High Holborn	Residential Retail	6	463	£4,608	£9,482	£3,081	£6,339	33.15%				G, H
			23									
Grape Street / Vine Lane	Residential Commercial	6	2,699	£24,570	£8,141	£15,790	£5,232	35.74%				I, J
			319									
West Central Street	Residential Commercial	7	2,706	£24,780	£7,293	£24,258	£7,139	2.11%				K, L
			692									
Site Wide Works				£14,070	£453	£14,070	£453	0				
<b>TOTAL</b>			<b>31,087</b>	<b>£205,893</b>	<b>£6,623</b>	<b>£189,947</b>	<b>£6,110</b>	<b>7.75%</b>	<b>£264,778</b>	<b>£8,517</b>	<b>-28.60%</b>	<b>A,B,C,D</b>

**APPENDIX N: BCIS DATA**



**£/M2 STUDY**

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 01-Jul-2023 07:32

Rebased to London Borough of Camden ( 130; sample 53 )

MAXIMUM AGE OF RESULTS: DEFAULT PERIOD

Building function (Maximum age of projects)	£/m <sup>2</sup> gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
320. Offices							
Generally (15)	3,035	1,459	2,136	2,884	3,575	7,253	53
Air-conditioned							
Generally (15)	2,924	1,723	2,435	2,793	3,374	5,097	19
1-2 storey (15)	2,914	1,723	2,542	2,635	2,942	5,097	9
3-5 storey (15)	2,873	1,987	2,293	2,787	3,449	3,999	8
6 storey or above (20)	3,311	2,528	2,970	3,167	3,404	4,755	8
Not air-conditioned							
Generally (15)	3,046	1,459	2,024	2,924	3,920	4,746	21
1-2 storey (15)	3,076	1,680	2,015	3,071	3,849	4,697	14
3-5 storey (15)	2,933	1,459	2,031	2,489	4,028	4,746	6
6 storey or above (25)	3,481	2,720	-	3,589	-	4,027	4
340. Mixed commercial developments (15)	1,927	1,220	1,489	1,550	2,461	2,914	5
816. Flats (apartments)							
Generally (15)	2,288	1,137	1,903	2,160	2,582	7,862	850



Building function (Maximum age of projects)	£/m <sup>2</sup> gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
1-2 storey (15)	2,156	1,336	1,829	2,053	2,403	4,489	181
3-5 storey (15)	2,258	1,137	1,897	2,160	2,560	4,801	568
6 storey or above (15)	2,712	1,650	2,189	2,558	2,955	7,862	98





This contract value is close to the limit of the data used to construct the model and estimate should be used with caution.

### New Build, Construction

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SELKIRK HOUSE AND WEST CENTRAL STREET BUILDINGS, MUSEUM STREET, LONDON  
REVIEW OF COST MODEL REV 1 (STAGE 2)

**The estimated construction duration from Start on Site to Construction Completion is 90 weeks**  
( this is an average for the project as described below ).

The 90% confidence interval for this estimate is 83 to 97 weeks.

Individual projects will take more or less time than the average: the 90% prediction interval for individual projects is 61 to 132 weeks.

**The estimate is based on the following project details:**

**Contract value:** £205,000,000 at 3Q 2023 (385; forecast) prices and London Borough of Camden ( 130; sample 53 ) level

**Building function:** Offices

**Procurement:** Design and build

**Selection of contractor:** Single stage tendering

**Client organisation:** Private



BCIS All-in TPI #101  
BCIS All-in TPI

Base date:  
1985 mean = 100  
Updated:  
09-Jun-2023  
Series no.  
#101

			Percentage change		
Date	Index	Equivalent sample	On year	On quarter	On month
1Q 2021	328	Provisional	-2.1%	0.0%	
2Q 2021	331	Provisional	-1.2%	0.9%	
3Q 2021	339	Provisional	2.7%	2.4%	
4Q 2021	344	Provisional	4.9%	1.5%	
1Q 2022	349	Provisional	6.4%	1.5%	
2Q 2022	365	Provisional	10.3%	4.6%	
3Q 2022	371	Provisional	9.4%	1.6%	
4Q 2022	375	Provisional	9.0%	1.1%	
1Q 2023	379	Provisional	8.6%	1.1%	
2Q 2023	383	Provisional	4.9%	1.1%	
3Q 2023	385	Forecast	3.8%	0.5%	
4Q 2023	388	Forecast	3.5%	0.8%	
1Q 2024	390	Forecast	2.9%	0.5%	
2Q 2024	392	Forecast	2.3%	0.5%	
3Q 2024	393	Forecast	2.1%	0.3%	
4Q 2024	399	Forecast	2.8%	1.5%	
1Q 2025	401	Forecast	2.8%	0.5%	
2Q 2025	405	Forecast	3.3%	1.0%	
3Q 2025	405	Forecast	3.1%	0.0%	
4Q 2025	411	Forecast	3.0%	1.5%	

# Appendix 2: BPS Appraisal

Selkirk House, W1CA  
BPS Appraisal  
2023/2510/P

Development Appraisal  
BPS Surveyors  
27 July 2023

Selkirk House, W1CA  
 BPS Appraisal  
 2023/2510/P

**Appraisal Summary for Merged Phases 1 2 3 4**

Currency in £

**REVENUE**

Sales Valuation	Units	ft <sup>2</sup>	Sales Rate ft <sup>2</sup>	Unit Price	Gross Sales
WCS   Private Resi	2	2,723	1,530.39	2,083,625	4,167,250
WCS   Int Residential	8	4,887	370.00	226,024	1,808,190
WCS   LCR Residential	11	9,397	181.56	155,101	1,706,107
VL   Private Residential	19	11,603	1,966.70	1,201,034	22,819,650
HH   Private Residential	4	<u>3,122</u>	1,831.55	1,429,525	<u>5,718,100</u>
<b>Totals</b>	<b>44</b>	<b>31,732</b>			<b>36,219,297</b>

**Rental Area Summary**

	Units	ft <sup>2</sup>	Rent Rate ft <sup>2</sup>	Initial MRV/Unit	Net Rent at Sale	Initial MRV
1MS   Offices   1-5	1	61,450	89.39	5,493,077	5,493,077	5,493,077
1MS   Offices   6-18	1	107,619	95.82	10,312,089	10,312,089	10,312,089
1MS   Retail & Class E   GF	1	6,211	35.00	217,385	217,385	217,385
WCS   Class E	1	6,964	42.78	297,945	297,945	297,945
VL   Class E	1	3,272	35.00	114,520	114,520	114,520
HH   Class E	<u>1</u>	<u>237</u>	35.00	8,295	<u>8,295</u>	<u>8,295</u>
<b>Totals</b>	<b>6</b>	<b>185,753</b>			<b>16,443,311</b>	<b>16,443,311</b>

**Investment Valuation**

**1MS | Offices | 1-5**

Market Rent	5,493,077	YP @	4.2500%	23.5294	
(1yr 3mths Unexpired Rent Free)		PV 1yr 3mths @	4.2500%	0.9493	122,696,360

**1MS | Offices | 6-18**

Market Rent	10,312,089	YP @	4.2500%	23.5294	
(2yrs Rent Free)		PV 2yrs @	4.2500%	0.9201	223,257,262

**1MS | Retail & Class E | GF**

Market Rent	217,385	YP @	4.2500%	23.5294	
(1yr 9mths Unexpired Rent Free)		PV 1yr 9mths @	4.2500%	0.9298	4,755,624

**WCS | Class E**

# APPRAISAL SUMMARY

BPS SURVEYORS

## Selkirk House, W1CA

### BPS Appraisal

2023/2510/P

Market Rent	297,945	YP @	4.2500%	23.5294	
(2yrs 6mths Rent Free)		PV 2yrs 6mths @	4.2500%	0.9012	6,317,671

### VL | Class E

Market Rent	114,520	YP @	4.2500%	23.5294	
(2yrs 6mths Rent Free)		PV 2yrs 6mths @	4.2500%	0.9012	2,428,299

### HH | Class E

Market Rent	8,295	YP @	4.7500%	21.0526	
(2yrs 6mths Rent Free)		PV 2yrs 6mths @	4.7500%	0.8905	155,503

### Total Investment Valuation

**359,610,720**

### GROSS DEVELOPMENT VALUE

**395,830,016**

Purchaser's Costs			(24,453,529)	
Effective Purchaser's Costs Rate	6.80%			(24,453,529)

### NET DEVELOPMENT VALUE

**371,376,487**

### NET REALISATION

**371,376,487**

### OUTLAY

#### ACQUISITION COSTS

Benchmark Land Value	49,801,000			
Benchmark Land Value			49,801,000	49,801,000
Stamp Duty			2,479,550	
Effective Stamp Duty Rate	4.98%			
Agent Fee		1.00%	498,010	
Legal Fee		0.50%	249,005	
				3,226,565

#### CONSTRUCTION COSTS

Construction	ft <sup>2</sup>	Build Rate ft <sup>2</sup>	Cost
1MS   All Construction	260,325	504.37	131,300,000
Site Wide Construction	54,831	244.39	13,400,000

**APPRAISAL SUMMARY****BPS SURVEYORS****Selkirk House, W1CA****BPS Appraisal****2023/2510/P**

WCS   Construction	36,576	645.23	23,600,000	
VL   Construction	32,485	720.33	23,400,000	
HH   Construction	<u>5,231</u>	839.04	<u>4,389,000</u>	
<b>Totals</b>	<b>389,448 ft²</b>		<b>196,089,000</b>	
Contingency		5.00%	9,804,450	
CIL			2,741,644	
Section 106 estimate			3,500,000	

212,135,094

**PROFESSIONAL FEES**

Professional Fees		10.00%	19,608,900	19,608,900
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**MARKETING & LETTING**

Marketing		1.50%	490,575	
Letting Agent Fee		10.00%	1,644,331	
Letting Legal Fee		5.00%	822,166	
				2,957,072

**DISPOSAL FEES**

Sales Agent Fee		1.00%	3,713,765	
Sales Legal Fee		0.50%	1,856,882	
				5,570,647

**Additional Costs**

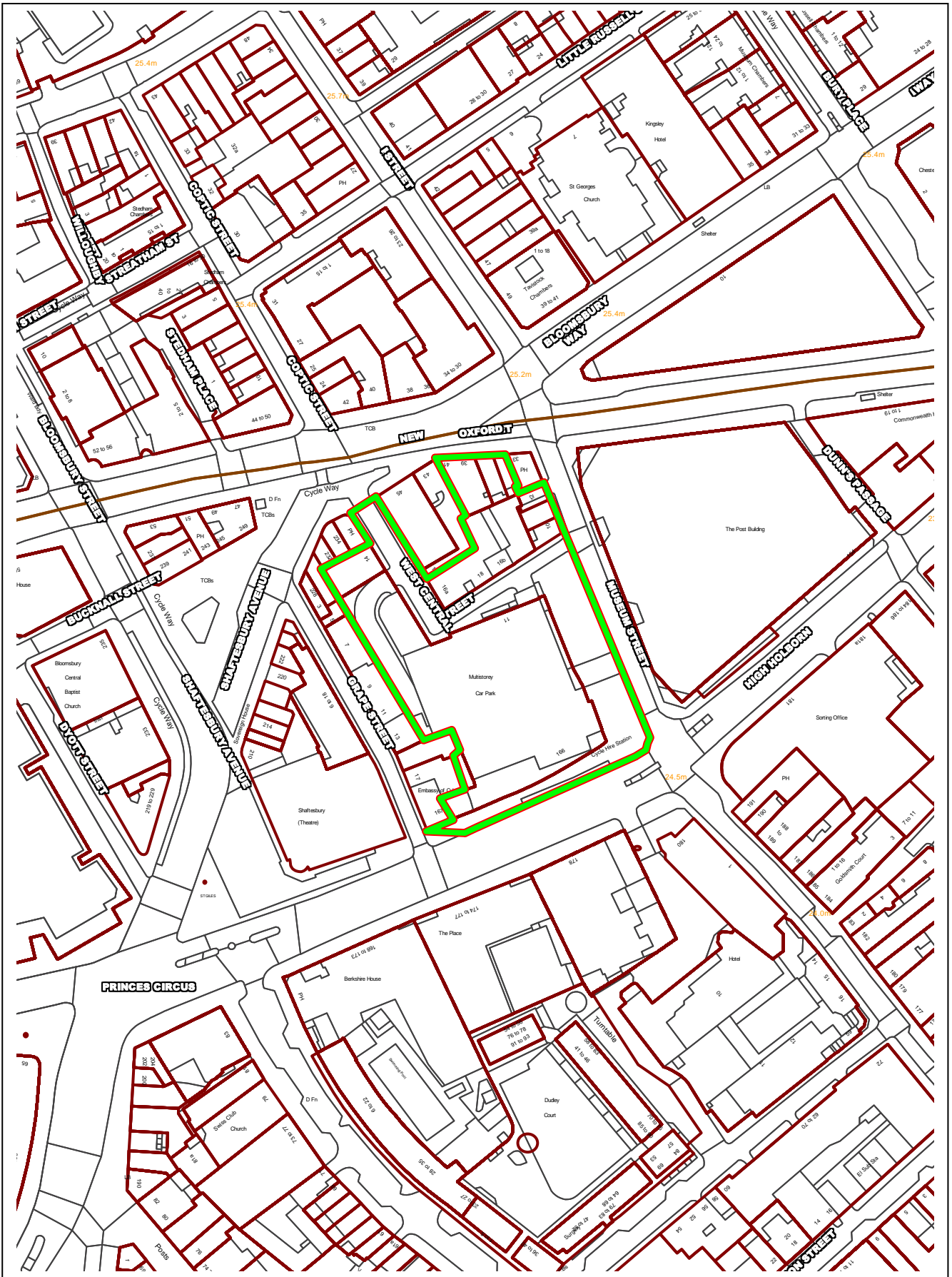
Office Void Costs (1MS)			4,525,444	
Third Party Costs			1,065,000	
				5,590,444

**FINANCE**

Debit Rate 6.500%, Credit Rate 0.000% (Nominal)				
Total Finance Cost				46,774,399

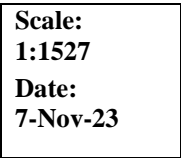
**TOTAL COSTS****345,664,121****PROFIT****25,712,367****Performance Measures**

Profit on Cost%	7.44%
Profit on GDV%	6.50%
Profit on NDV%	6.92%



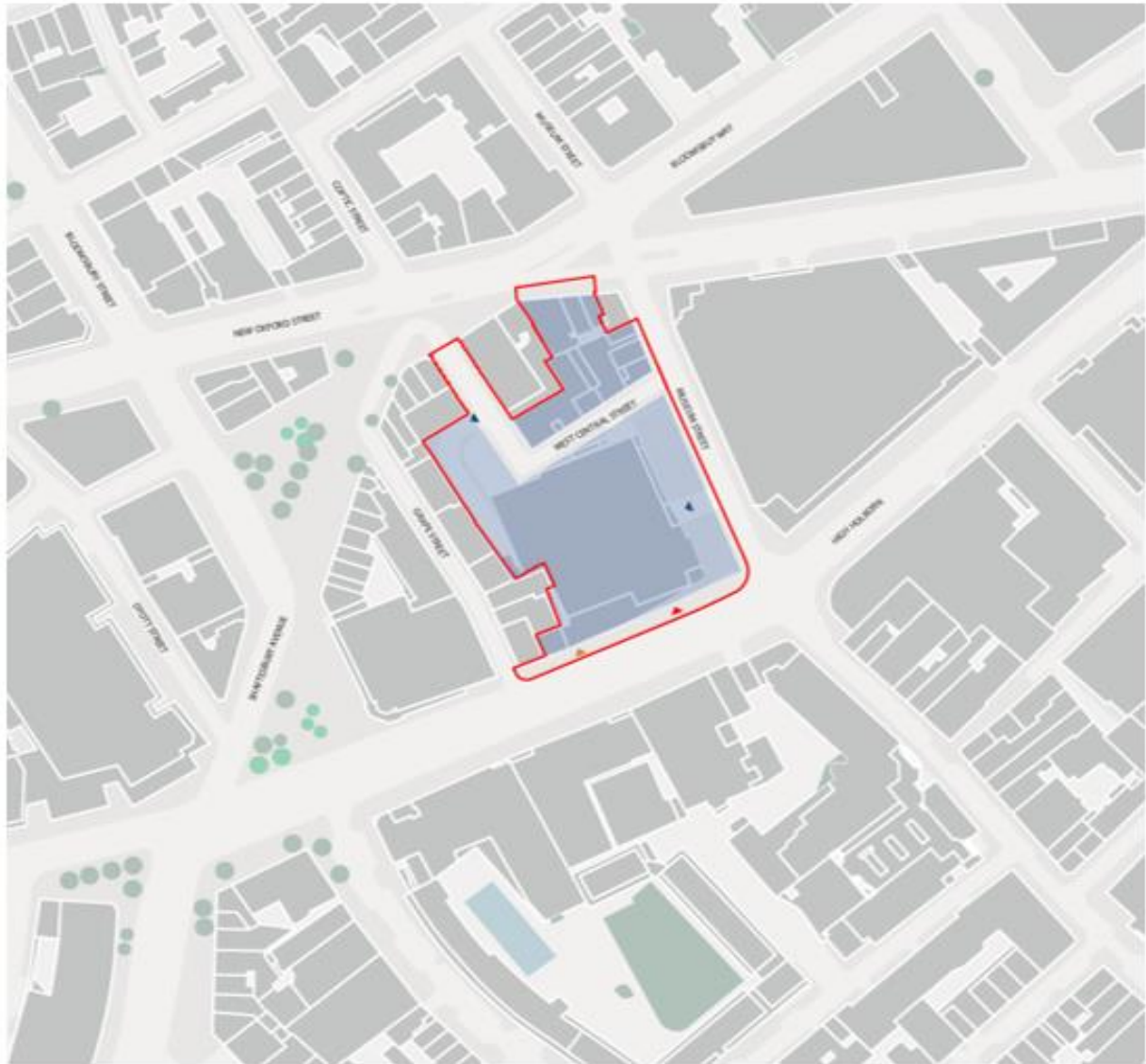
Application No: 2023/2510/P  
 Selkirk House, 166 High Holborn, 1 Museum Street,  
 10-12 Museum Street, 35-41 New Oxford Street and  
 16A-18 West Central Street, London WC1A 1JR

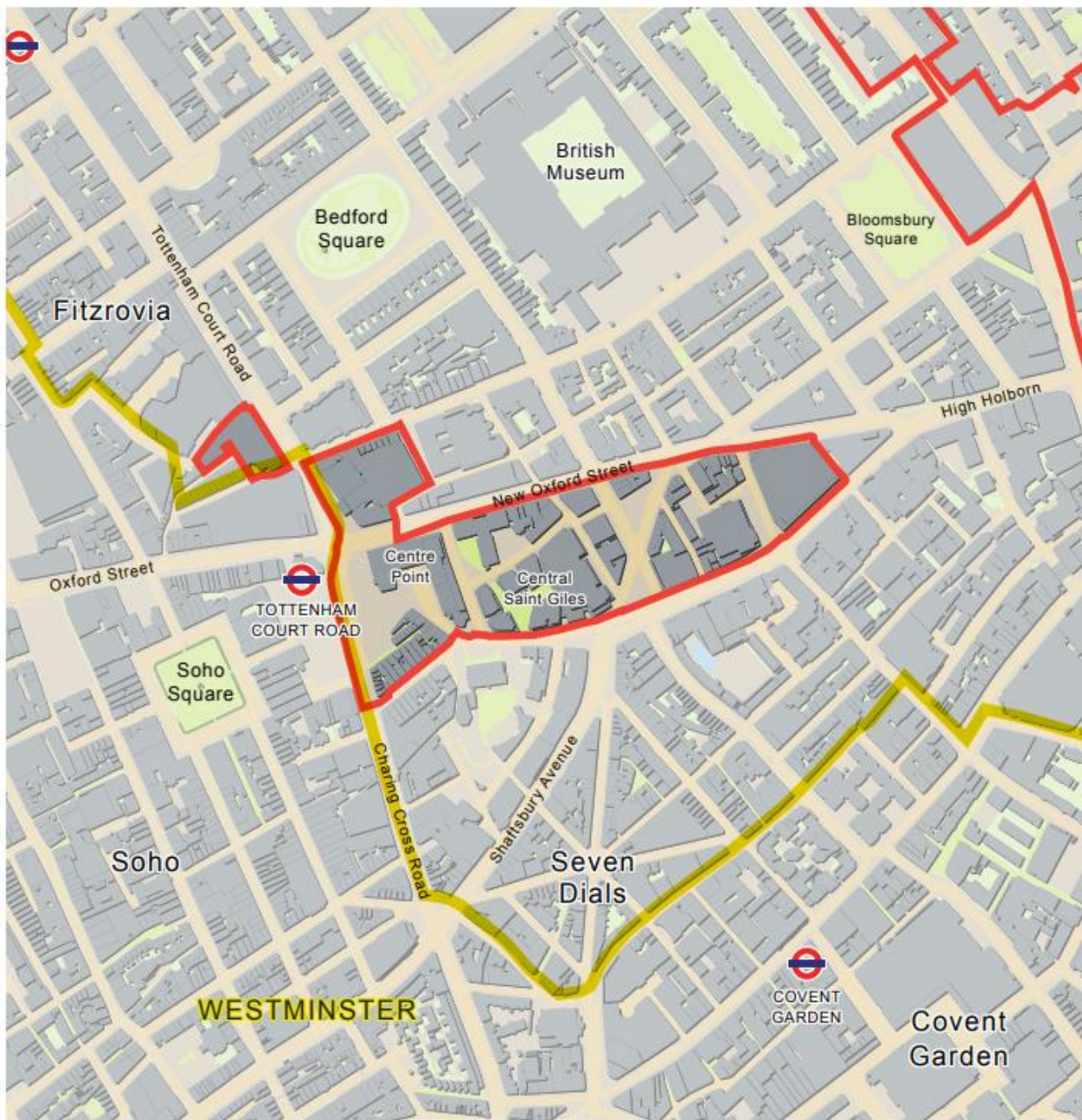
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 Date:  
 7-Nov-23

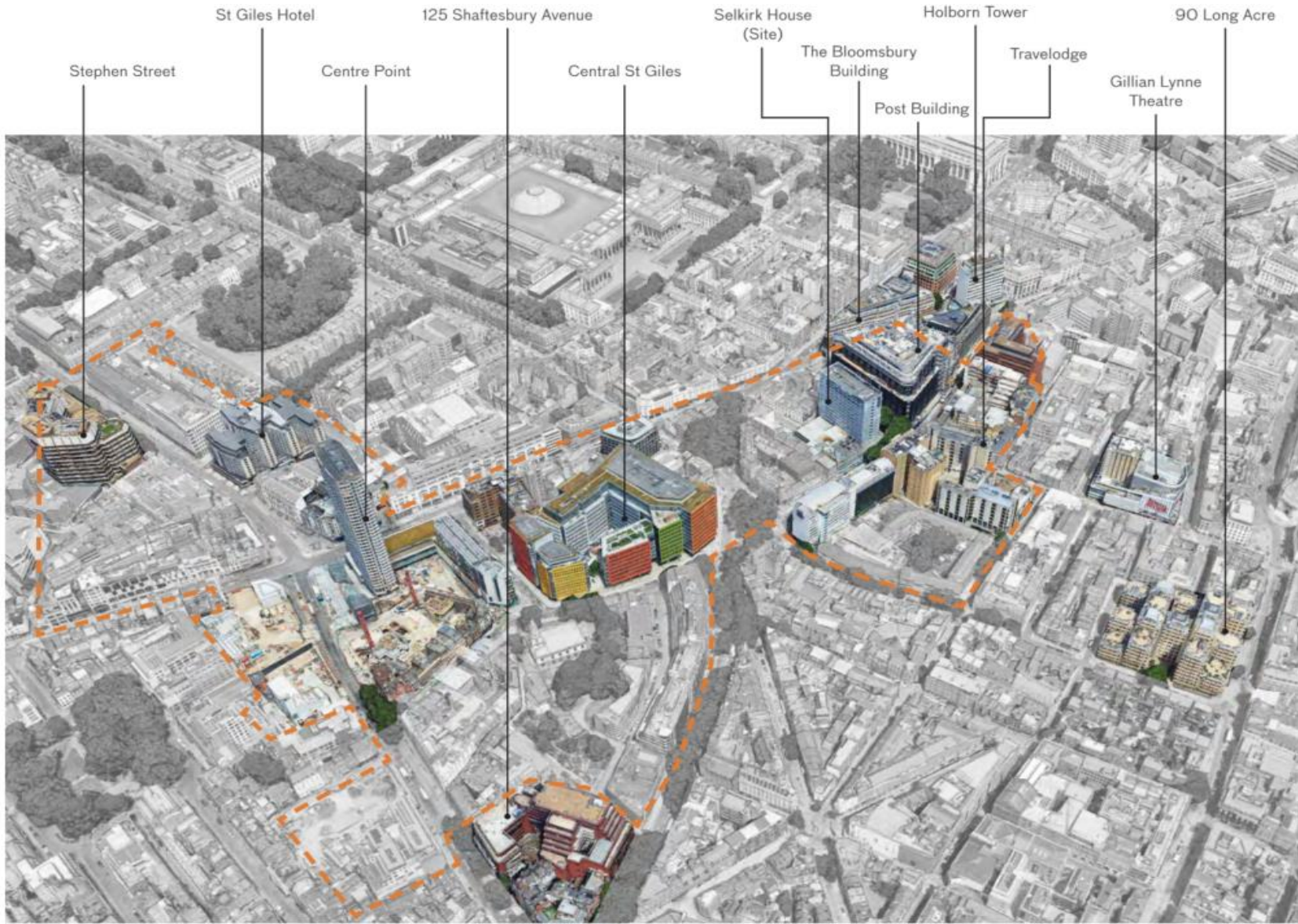


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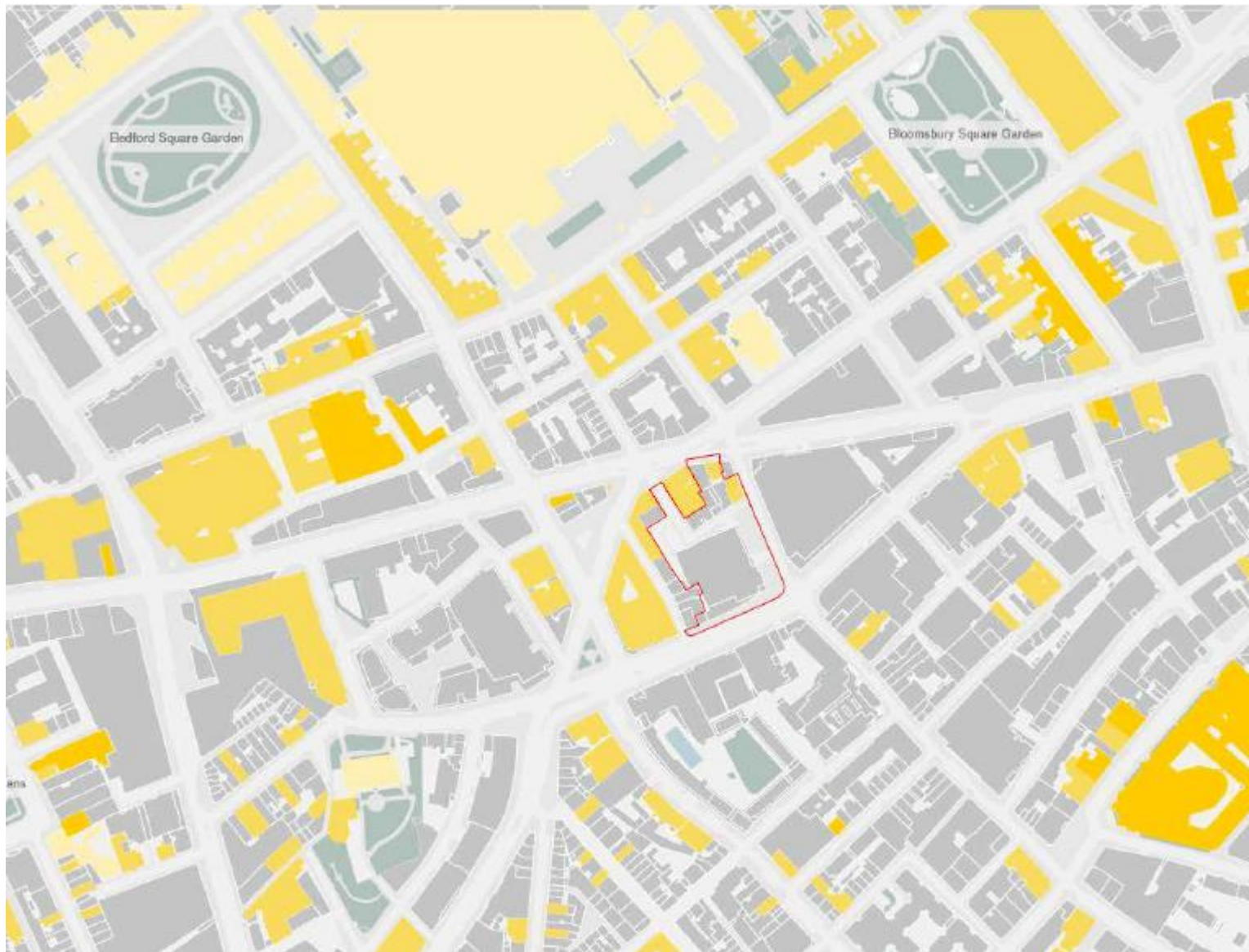


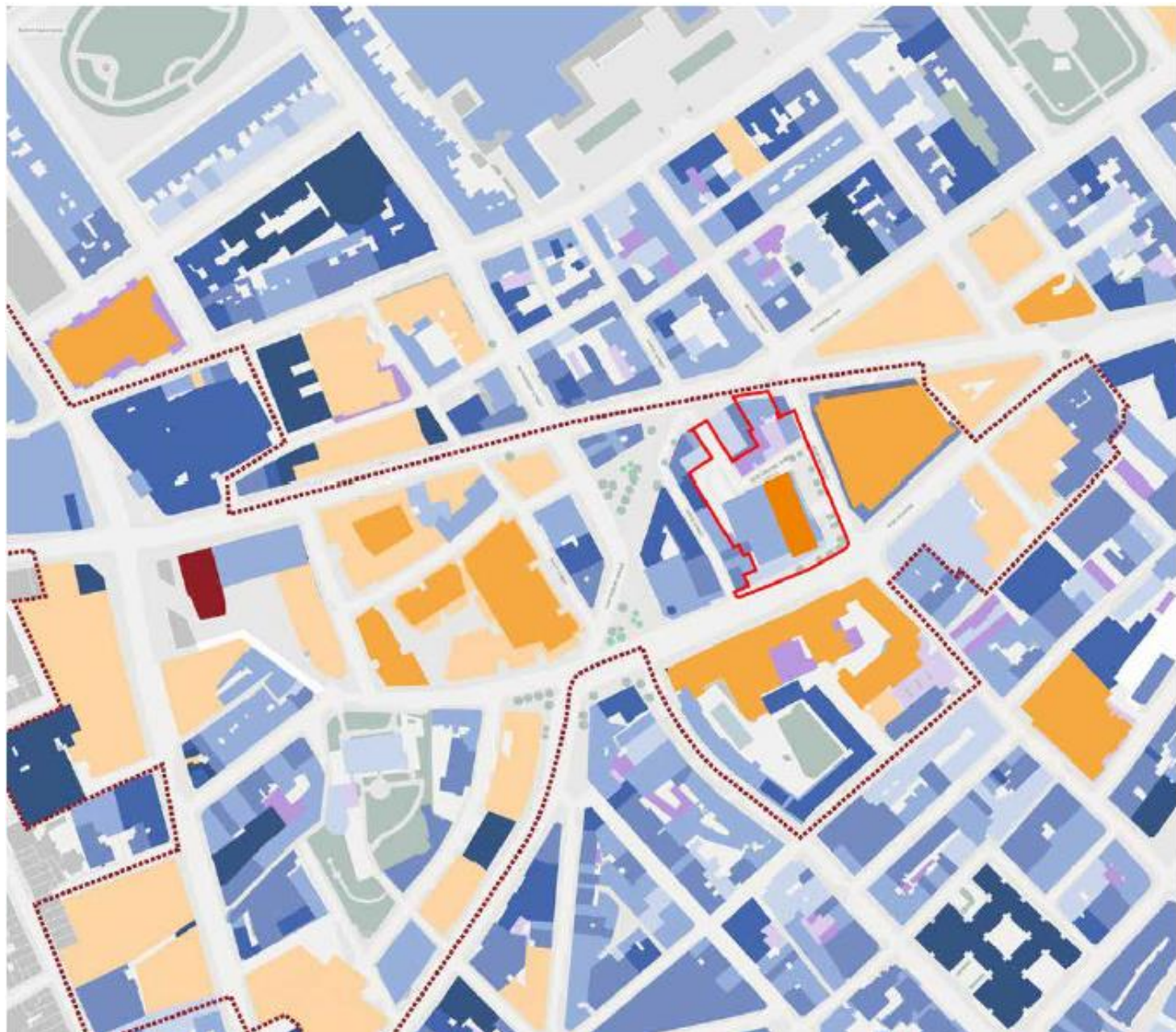




Aerial View with Tottenham Court Road Opportunity Area







**Key:**

**Lower Grain**

- 1 storey
- 2 storeys
- 3 storeys
- 4 storeys
- 5 storeys
- 6 storeys
- 7 storeys

**Taller Grain**

- 8+ storeys
- 12+ storeys
- 16+ storeys
- 20+ storeys
- 30+ storeys



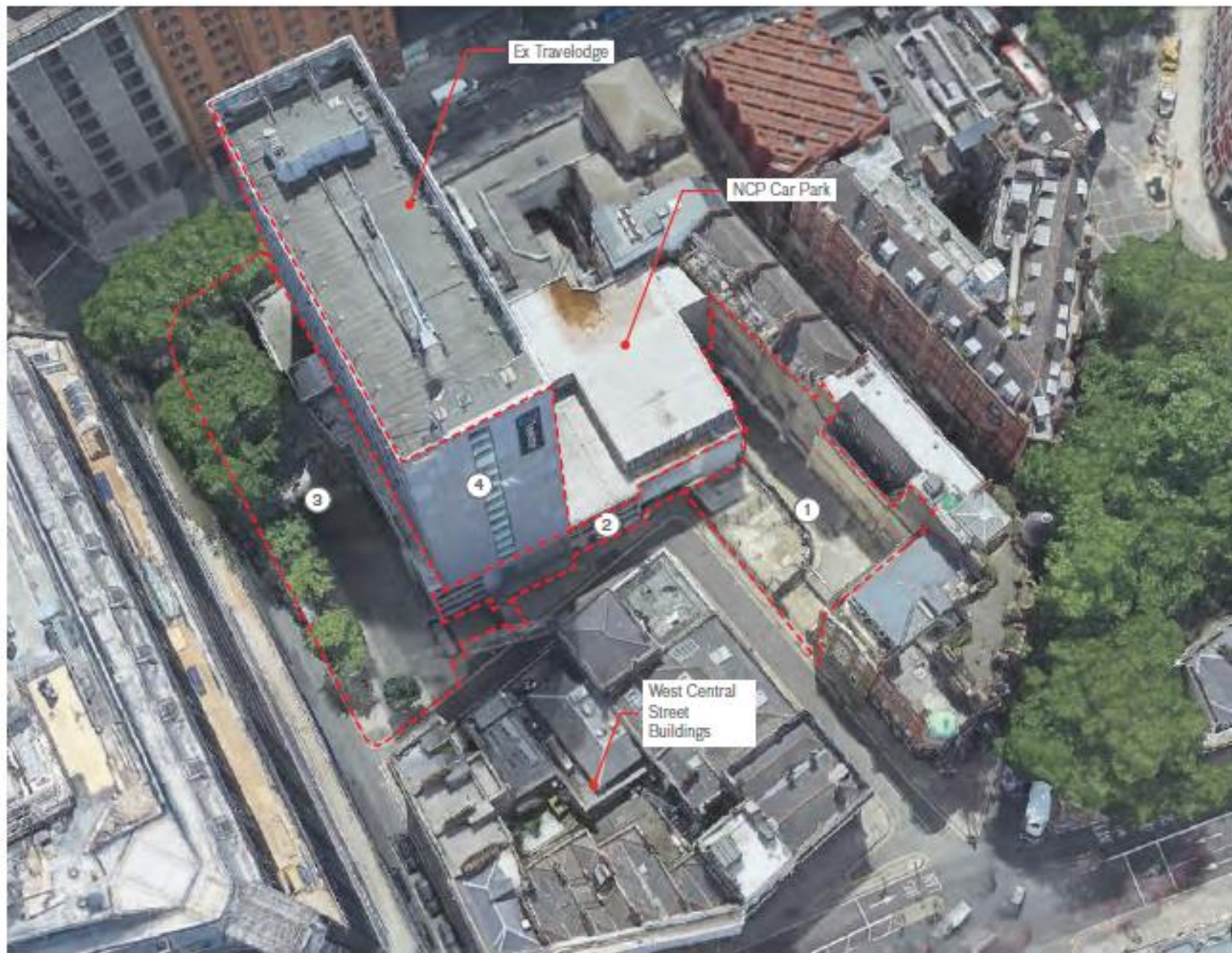
Section BB



Section CC















①



②



③

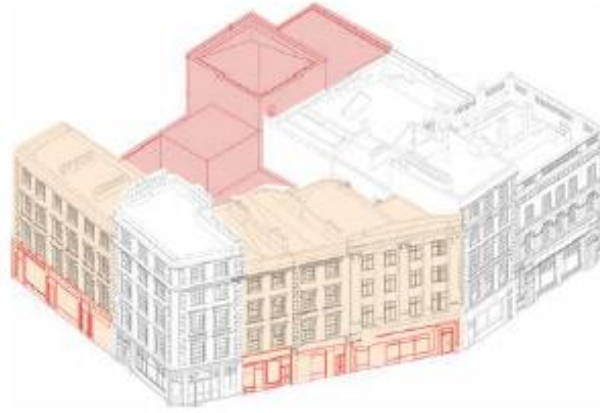


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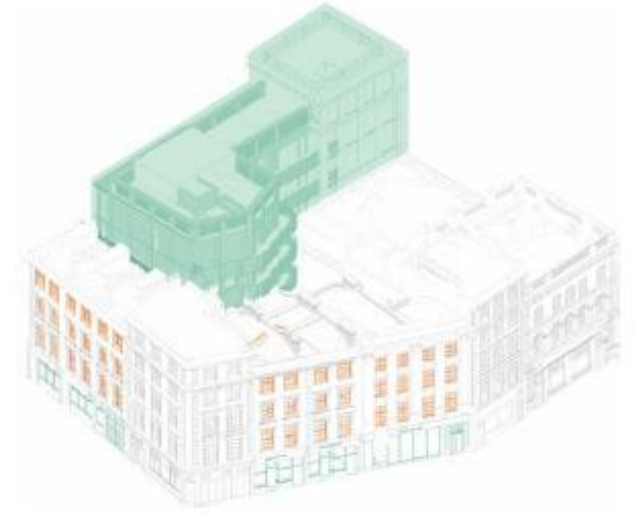




**01:** Existing Buildings and Site Boundary



**02:** Demolition of 16A-18 West Central Street & repair/  
upgrade of the New Oxford Street buildings and 10-12



**03:** Replacement of 16A-18 West Central Street



- High Holborn Block
- One Museum Street
- Vine Lane Block
- West Central Street Buildings

