LSE Centre Buildings Redevelopment
in the City of Westminster
planning application no. 14/1226

Strategic planning application stage 1 referral.

The proposal

The demolition of existing buildings known as Clare Market, The Anchorage, the East Building, St Clements (partial) and Tower One (partial) and redevelopment to provide replacement interconnected academic facilities for D1 and ancillary uses, comprising a two storey basement, a part 6 storey / part 13 storey building and a 7 storey core extension to the St Clements building, and associated cycle parking and other works. All arranged around a new public square.

The applicant

The applicant is The London School of Economics and Political Sciences and the architect is Rodgers Stirk Harbour + Partners.

Strategic issues

The principle of intensified redevelopment of the site for education facilities is strongly supported, but this application raises issues relating to urban design, historic buildings & conservation, access, sustainable energy and transport require resolution.

Recommendation

That Westminster Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 61 but the possible remedies set out in that paragraph could address these deficiencies.

Context

1. On the 16 January 2015 Mayor of London received documents from Westminster Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2. The application is referable under Category 1C of the Schedule to the Order 2008:
1C: Development which comprises or includes the erection of a building of one or more of the following descriptions: (c) the building is more than 30 metres high and is outside the City of London.

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

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

5. The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6. The LSE campus occupies a range of buildings from Lincoln’s Inn Fields to the north through to Aldwych in the south, at the centre of which is the proposed redevelopment site. The site is currently occupied by a number of partly vacant buildings located in the centre of the LSE’s campus at the junction with Clare Market and Houghton Street. The buildings are known as St Clements, Clare Market, Anchorage and the East Building.

7. The Site is located on Houghton Street just off Aldwych which forms part of the Strategic Road Network (SRN). It is located approximately 400 metres from Victoria Embankment which forms part of the Transport for London Road Network (TLRN). Temple London Underground station, served by the District and Circle Lines, is approximately 400 metres from the Site and further London Underground stations are located within easy walking distance. Numerous bus routes can be accessed from Aldwych or the Strand. The density of public transport provision in proximity to the site means it has a Public Transport Accessibility Level (PTAL) of 6b. The highest on a scale of 1 to 6.

Details of the proposal

8. The development proposals are for the demolition of existing buildings known as Clare Market, The Anchorage, the East Building, St Clements (partial) and Tower One (partial) and redevelopment to provide replacement interconnected academic facilities for D1 and ancillary uses, and associated cycle parking and other works. All arranged around a new public square.

Case history

9. The site development has been subject to a design competition and the application proposals have evolved from the winning design. Since the competition the design has been evolved through consultation with Westminster Councillors, Westminster Council pre-application meetings, Westminster’s Public Realm Advisory Group and English Heritage. The GLA have had no pre-application meetings or discussions before the submitted proposals.

Strategic planning issues and relevant policies and guidance

The relevant issues and corresponding policies are as follows:

- Education  
  London Plan; Ministerial statement July 2010
- Economic development  
  London Plan; the Mayor’s Economic Development Strategy
10. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2011 Westminster City Council Core Strategy, saved policies of the 2007 Westminster Unitary Development Plan and the 2011 London Plan.

11. The following are also relevant material considerations:

- Further Alterations to the London Plan (January 2014)

**Principal of development/Education use**

12. The application by the London School of Economics (LSE) is for the demolition of 11,871 sq.m non-residential institution use (D1) across 4 buildings and its replacement with a building of 18,055 sq.m of the same use. The development intensifies the site area use by providing an additional 6,184 sq.m of floorspace in the form modern high quality educational facilities.

13. The new building will accommodate a mixture of teaching facilities, accommodation for academic departments and research institutions, student study spaces and catering in the form of large refectory/dining area/café. The LSE require these new facilities due to strong demand for better modern academic accommodation in response to increased capacity requirements that cannot be met with the existing buildings across its campus.

14. London Plan policy 3.18 is supportive of the provision and enhancement of education facilities across London and states:

*The Mayor will support provision of early years, primary and secondary school and further and higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, particularly in parts of London with poor educational performance.*
15. Specifically in relation to this application which proposes the expansion and improvement of the existing facilities on the LSE campus the London plan policy is clearly supportive with the policy also stating:

*Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes.*

16. In context of London Plan policy there is clear support for expansion and enhancement of higher education facilities in London with the LSE status contributing to the unparalleled choice of undergraduate and postgraduate degrees and fits with the promotion of London’s role as a World City. Furthermore, Policy 4.12 improving opportunities for all is supportive of a redevelopment as it states “*Strategic development proposals should support local employment, skills development and training opportunities.*” The additional educational facilities of the LSE will add to capacity in London to offer a trained and skilled workforce, with paragraph 3.107 of the London Plan stating:

“*Universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy and for the capital to remain globally competitive.*”

17. The principle of the application proposal for a new high quality educational facility that responds for the increased floorspace needs of the LSE is therefore strongly supported by London Plan policy.

**Urban design**

18. The application proposals have been through three pre-application meetings and two design workshops with Westminster Council as well as two pre-application meetings with English Heritage. The submitted application is the first opportunity to comment on a detailed scheme that has been subject to modifications through Westminster Council and English Heritage pre-application discussions. For this reason issues have been raised by GLA officers in terms of clarification on the approach to the design and evidence of the alternatives explored.

19. The development proposals require the demolition and partial demolition of the buildings known as Clare Market, The Anchorage, the East Building, St Clements (partial) and Tower One (partial). In evolving the development proposals the applicant has been provided with guidance from Westminster Council that the loss of these buildings would be acceptable should the replacement building be of a high quality of design. Key features of the proposed development are:

- The main development will consist of two adjoining parallel blocks forming part 6 storey (Houghton Street block) and part 13 storey building (The Tower Building) with a two storey basement, which are unified by a consistent six metre grid framework.

- A seven storey access core to the partially demolished St Clements building providing a new main entrance for remainder of the building that will link into the basement lower ground level spanning the site.

- The Tower Building fenestration and shading is defined by the use of double sized glazing panels to create the stepped grid and highlight the route of the internal staircase running through and up the tower building further highlighted by use of colour. The six metre bays elsewhere on the facade sub-divide into one-metre sections of openable windows. At the end of the blocks have bookends of exposed steel bracing that give lateral stability to the building.
• At lower levels the secondary framing supports reconstituted stone rainscreens intended to compliment the stone facade of the Old Academic Building opposite.

• Green roof terraces are proposed on the second and sixth floors of the Houghton Street block.

• At ground floor a large atrium contains the main entrance and access to staircases and lifts, the majority of the space is given over to catering facilities with the rear accommodating kitchen and servery space.

• A lower ground floor spans the majority of the site and is arranged around a flexible foyer for teaching, study and breakout space from where Harvard style lecture theatres and 180 seat auditorium can be accessed. The lower ground floor is accessed from the ground floor on Houghton Street (staircase and lifts) and also from the new St Clements core entrance. There is a further sub-basement primarily for plant machinery and storage.

• The first and second floors facing Houghton Street contain seminar and classroom space with research/academic facility at the tower end of the building.

• Third floor and above is location of academic departments with controlled access via lifts and interconnected staircase that form a series of double height spaces across the façade.

20. The new LSE Square is formed by the part demolition of St Clements building and the East building together with the realignment of St Clements Passage to connect the space to the existing Library Plaza. The square is intended to be used the general public, students and staff and accommodate student information stalls, catering pop-ups, open air lectures/debates/films and markets. Building proposals provide active edges to the public space with the Houghton Street building having double doors at alternate bays to a café/bar and student hub positioned to face the space and the new St Clements Core designed to face the new LSE Square.

Layout & urban form

21. The development proposals insert the new building into the existing urban form of the Strand Conservation Area where it consists of narrow streets, passages and lanes, in doing so the primary outcome the demolition and new building is the creation of a new public square in the centre of the LSE campus.

22. The new building occupies a south-west to north east orientation that results on the demolition of Clare Market, The Anchorage, the East Building, St Clements (partial) and Tower One (partial). The impact on the public realm is positive in that the building layout provides active ground floor frontages to Houghton Street Clare Market and onto the new LSE Square. The creation of the new public square is welcome as it provides a new identifiable centre to the LSE campus and the new building creates a highly active ground floor compared to the existing buildings on Houghton Street and Clements Inn Passage.

23. Although the new building tries provides active frontages to all edges of LSE Square and Houghton Street there are issues with some area of blank inactive facade that should be addressed. The most prominent is where the corner of the student centre ground floor (north façade) faces the LSE Square and existing cafe/bar. The applicant is encouraged to explore possible ways in which this can be eliminated.
24. At ground floor level Clements Inn Passage is maintained as a route by the building rising to first floor level and the passage is both widened and realigned and it would be helpful in the understanding of this route if CGI’s are provided to help understand the quality of the route. Whilst the retention of Clements Inn Passage is welcome, GLA officers are interested in the evolution of this design solution and whether any thought was given to increasing the height where the building goes over the route to retain The Anchorage Building, as the building is the last remaining character element of the passage.

25. It understood that LSE require 18,055 sq.m floorspace to accommodate increased educational and research needs in modern facilities and the existing campus has limited land available for increased floorspace. The adopted approach for the development layout reflects this and any alternative on an infill smaller plot/plots basis would result in a higher density scheme of tall buildings that could adversely impact on the Strand Conservation Area and Lincoln’s Inn Fields. Such a development would furthermore contribute to overshadowing across an already narrow street pattern and now allow for a new public square at the heart of the LSE campus. The overall layout approach is therefore supported.

Street form & public realm

26. The development proposals result in a significant improvement to the public realm when compared to existing streetscape of this part of the LSE campus. The building proposals offer an active ground floor frontage to currently inactive edge Houghton Street and Clements Inn Passage. The proposed LSE Square will make a fundamental change to this part of LSE campus and is supported as it will have a positive transformational impact on the existing public realm. The footfall will increase substantially with the increased floorspace provide and the public realm improvements are reflective of this increased pedestrian flow.

Height, scale and massing

27. The building massing consists of two parallel joined blocks, a tower block to the north facing the LSE square and lower rise block facing Houghton Street. This approach reduces the overall bulk of the building in response to the surrounding urban fabric. The Tower block is 12 storeys with a plant enclosure on the 13 floor responds to the existing tall building cluster of the LSE Towers and the Thomas More building. Whilst the Houghton Street block is 6 storeys and responds to the height context set by the Old Building and surrounding area which are of 4-7 storey mid-range height. The building height, massing and scale is viewed as acceptable in terms of the location and impact on LVMF strategic views and those from Lincoln’s Inn Fields are minimal (see below).

Facade materials

28. The lower levels of Houghton Street building will be clad in reconstituted stone to reflect the Old Building opposite with the frames of to the double glazing on the facades are proposed as natural aluminium. Other solid areas of the facade that provide a thermal envelope are natural anodised panels, whilst the main stair case soffits are red to bring it out as strong design feature. The vertical solar shading itself will have a subtle change to colouration.

29. The palette of materials proposed for the facades reflect the colouration from the various building types around immediate area of the LSE campus. Overall the building will be of a different architectural style and materiality to the existing build environment, however there is no dominant style or facade material across the campus and the use of colouration from this varying palette contributes to the quality of the building design.
LVMF and local views

LVMF strategic views

30. There are number of strategic LVMF viewpoints that require to be assessed due the buildings location. LVMF 14A.1 Blackfriars Bridge, upstream at the centre of the bridge: very slight/negligible impact behind Hamilton House partially obscured by mature trees fitting with the existing plane of the buildings; LVMF 16A.1 The South Bank, outside Royal National Theatre. The building can be viewed to the right of Somerset Housing fitting with the horizontal plane of the adjacent buildings with medium/low impact; and LVMF 15B.2 Waterloo downstream – at the centre of the bridge: building appears above the horizontal plane of Somerset House, but the roofscape of existing buildings behind have a stronger impact and the addition of the proposed building will be of medium impact.

Local viewpoints: Lincoln’s Inn Fields

31. The key local viewpoints impacted are: Lincoln’s Inn central axis: glimpsed view in winter months in winter months and obscured by tree canopies for rest of year. The edge of upper floors can be seen but just above building line and have a low/slight impact but existing roof features are more dominant; Lincoln’s Inn north east, a glimpsed negligible view in winter months again obscure by tree canopies the rest of the year. The upper floors of the building sit above the existing roof line edge to the park but are a linear form fits with the existing roofscape; and Lincoln’s Inn north west, gain a negligible glimpse view in winter months obscured by tree canopies for rest of the year. Upper floor of the taller block consisting of machinery/servicing will just above the existing roofline with minimal impact.

Design & heritage

32. The application requires the demolition of Clare Market, The Anchorage, the East Building, St Clements (partial) and Tower One (partial) to accommodate the quantum of required floorspace to accommodate the facilities required by the LSE and deliver the new public square. In evolving the development proposals the applicant has been provided with guidance from Westminster Council that the demolition of Clare Market, partial demolition of the St Clements building and partial demolition of Tower One were acceptable by virtue of these buildings making either a negative or neutral contribution to the character of the conservation area, but that the loss of the The Anchorage Building and East Building would only be acceptable if the replacement building is of a high quality of design and demonstrates that it preserves and preferably enhances the character and appearance of the conservation area.

33. The Anchorage building occupies Nos. 8–10 Clements Inn Passage and was built in the mid-1850s and is considered to make a positive contribution to the character of the conservation area. It is a Victorian brick building of four storeys and is the only remaining historic building on Clements Inn Passage. The applicant has justified the loss of the building on the basis that it is located in the middle of the eastern edge of the proposed site and is difficult to integrate within the new development; the extensive redevelopment of the building interior means the historic value is diminished because it was substantially modified in 1974 and 1991 meaning little of the interior fabric has been retained; the integration of the building is difficult given the small size of rooms in the building; the building would reduce the site usage efficiency as it would remove large mass of the proposed building. In addition the pedestrian route through Clements Inn Passage is to be retained in modified form through widening to enable better connectivity. The demolition of this mid-19th century building is therefore regrettable but on balance it is considered that its retention within the overall development scheme would be unfeasible and would result in an unsatisfactory façade only scenario engulfed within a much larger new building.
34. The East/Houghton Street building was purpose built for the LSE and dates back to 1931. It is a steel frame constructed building clad in Portland Stone, with a striped classical facade that steps back from Houghton Street. The building is neither listed by English Heritage and is not identified as a building contributing to its setting according to the conservation area audit.

35. The East/Houghton Street building was however viewed by Westminster Council offices of making a contribution to the conservation area; the applicant was therefore requested to explore design options that would retain the Houghton Street facade. The exploration of a facade retention scheme demonstrated that it would be difficult to achieve a viable design due to the stepped nature of the facade and how it turned the corner making it difficult to identify meaningful area of retainable facade; any retention solution would be expensive and not achieve the quantum of floorspace and floorplate required by the LSE and the fenestration would impact on light penetration into the building. GLA officers share Westminster Council officers view that this is a 1930s edifice of some interest, though not of the calibre of the earlier Old Building (1920-31), and its loss is also regrettable but again a facade retention scheme (produced by the applicant on request of Westminster Council) would result in an awkward and unsuccessful piece of townscape.

Conclusion

36. The proposed development proposals are of a high quality providing for an intelligent solution to inserting a new high quality building whilst creating a new public space within the dense urban fabric of The Strand Conservation Area at the centre of the LSE campus. The development height and massing will result in a minimal impact on LVMF strategic views and have a very limited impact on the setting of Lincoln’s Inn Fields and are therefore viewed as acceptable in relation to London Plan policy. The applicant should respond to the design comments relating to how parts of the facade ground floor frontage respond to the public realm and provide assurance over the approach to maintaining the route of Clements Inn Passage.

Access

37. The design & access statement sets out a detailed access strategy completed by an access consultant, which is welcomed. It takes account of account the Accessible London SPG, however the access section references the 2004 and not the 2014 version and the applicant should take note of the further guidance contained within the 2014 SPG for Higher Education establishments. The applicant has considered access in its broadest sense and the LSE network of disabled students and staff have been consulted as part of the design process, which is welcomed. The design and access statement details many accessible design features of the building including the acoustics and technology to benefit people with sensory impairments, but number of inconsistencies to be explained and further detail information provided before stage 2 referral:

- The proposals do not identify whether there can be any improvements to the existing ramp from John Watkin’s Plaza to LSE square
- The access section details that existing steps at the north of the square will be reformed as seating and seating will be integrated into planting, however no detail is provided as to the accessibility of seating is provided.
- The access section details an external lift from St Clements Inn. In principal this is welcome but further detail is required on the proposed lift and security measures to ensure an external lift is suitable.
• A platform lift will be provided within the new Student Centre; the use of platform lifts is not recommended for new buildings and as such further justification is required.

• The access section mentions a pass door to the revolving entrance, however none are shown on the plans

• The access section notes that the 4m wide circulation stairs will be designed to ambulant disabled standard with suitable handrails; however the design and access statement visuals show open riser stairs throughout that will not meet these standards and as such further clarification is required.

**Sustainable Energy**

38. The applicant has broadly followed the energy hierarchy and sufficient information has been provided to understand the proposals as a whole, however further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

39. A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting with controls and mixed mode ventilation allowing for natural ventilation.

40. The demand for cooling will be minimised through the incorporation of a fixed shading system located externally on the facade and through openable windows. The energy assessment demonstrates that an overheating risk analysis with reference to CIBSE TM52, including use of the 2050 weather files, has been undertaken and shows that the vast majority of units are passing under current and future climate scenarios. The development is estimated to achieve a reduction of 8 tonnes per annum (3%) in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development.

41. The applicant has carried out an investigation into nearby heat networks and has determined that there are no existing or planned district heating networks within the vicinity of the proposed development, identifying the UCL campus as the nearest. However, the London Heat Map shows that the development is within close proximity to the existing Citigen network, evidence of correspondence with Citigen should be provided to demonstrate that the opportunity to connect has been investigated.

42. The applicant has stated that feasibility studies have been conducted by the university on a potential heat network for the LSE Quarter. The applicant should provide further detail on the current status of the studies and how the energy centre for the proposed development could be a starting point for a network in the LSE quarter. The applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

43. The applicant is proposing to install a single central plant room in the basement of the development to serve the heat network. However, it should confirm that all non-domestic building uses will be connected to the energy centre and an indicative floor area of the energy centre should also be provided.
44. The applicant is proposing a 300 kWe biofuel CHP which is sized to provide the domestic hot water load, as well as a proportion of the space heating (70% of the total heat load). The applicant should provide the carbon savings associated with the biofuel CHP alone (i.e. separate from the PV) and provide sufficient information to support the savings claimed. Correspondence with a potential biofuel CHP supplier has been included; it should however provide confirmation of the biofuel carbon intensity from the fuel supplier and include further information on the security of supply. Although the applicant has included reference to the costs associated with the biofuel CHP. It should also provide a breakdown of the proposed cost savings from operation of the biofuel CHP, including how the costs were determined.

45. The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install a biofuel CHP system and photovoltaic (PV) panels. It is proposing to install a PV array onto the roof of the tower block of the development. The reduction attributed to the PV alone is 3% and a roof plan showing the proposed installation has been provided. The applicant should provide information on the size (kWp) and area (m²) of the proposed system. Overall a reduction in regulated carbon dioxide emissions of 116 tonnes per annum (44%) will be achieved through renewables.

46. Based on the submitted energy assessment the adopted approach will result in a reduction of 157 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 52%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan, however the comments above should be addressed before the carbon savings and compliance with London Plan energy policy can be verified.

**Transport**

**Impact on public transport**

47. The trip generation and mode split derived from the 2014 Travel Plan survey is acceptable and TfL considers that the net additional trips can be accommodated on the public transport network. This complies with London Plan policy 6.3 Assessing effects of development on transport capacity.

**Car parking**

48. The development proposals do not include any additional car parking spaces. This is supported by TfL. There are on street car club bays and electric vehicle charging points located in close proximity to the site. There are two existing blue badge parking bays within the Aldwych campus and further on-street blue badge parking bays are located in close proximity to the Site. Overall, the application is considered to comply with London Plan Policy 6.13 Parking.

**Cycling**

49. A total of 180 cycle parking spaces with showering and changing facilities will be provided for the Centre Buildings Redevelopment, this meets the standards set out in the further alteration to the London Plan. The application is considered to comply with London Plan policy 6.9 Cycling.
Pedestrians

50. Several of the streets surrounding the Site are pedestrianised and a new public square forms part of the proposals. This will allow additional permeability for pedestrians. A Pedestrian Environmental Review System (PERS) audit has been undertaken and the area was largely found to have a ‘good’ pedestrian environment. TfL recommends that Westminster Council may wish to secure some pedestrian / public realm improvements in order to cater for the large number of pedestrian trips generated by the Site. This will ensure compliance with London Plan Policy 6.10 Walking.

Travel Plan

51. There is an existing travel plan in place for LSE’s Aldwych campus and TfL agrees that the Centre Building Redevelopment should be integrated into this. An obligation should be placed on the applicant to update, monitor and fund the travel plan. This will ensure the application complies with the relevant elements of London Plan Policy 6.3 Assessing effects of development on transport capacity.

Construction / servicing

52. TfL requests the submission of a Construction Logistics Plan (CLP), which should seek to manage and minimise impact on the transport network; and make suitable and safe provision for pedestrians and cyclists. These plans should be agreed by WCC and TfL.

53. Most deliveries will be catered for by extending the existing ‘Towers basement’ which already serves the campus although larger vehicles will need to use the new public square. This is an acceptable proposal in principle but measures will need to be put in place in order to manage these vehicles given the nature of the development and associated high pedestrian flows. These should be set out as part of a delivery and servicing plan (DSP). Subject to the CLP and DSP being secured by condition, the application will meet current TfL guidance.

54. In partnership with the construction industry, TfL has developed a Standard for Construction Logistics, to reduce risks to vulnerable road users of construction vehicles. The Standard seeks to promote improved driving practices and use of safer vehicles. A commitment from the applicant and their primary contractors to demand a higher level of safety should form a key part of the CLP. Signing up to the Standard, as well as the Fleet Operator Recognition Scheme (FORS, or equivalent), helps in part to achieve this. Please see: http://www.tfl.gov.uk/info-for/freight/safety-and-the-environment/managing-risks-wrrr. TfL requests the applicant and their contractors sign up to this standard.

55. TfL wishes to ensure that construction vehicles are fitted with cycle specific safety equipment, including side-bars, blind spot mirrors and detection equipment to reduce the risk of collisions on the Capital’s roads. For any conflict points identified on the delivery routes associated with the site in its construction and operational state, traffic and pedestrian management measures and cycle specific safety equipment should be considered and the detail provided through the CLP and DSP.

Traffic Management Act

56. Finally due to the location of the site on the SRN, should this application be granted planning permission, the developer and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.
**Mayoral CIL**

57. The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3 toward the funding of Crossrail. The rate for the City of Westminster is £50 per square metre. On this occasion the development uplift is entirely D1 Non-residential institutions use class, which is not chargeable.

**Local planning authority’s position**

58. Unknown at the time of report preparation.

**Legal considerations**

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

**Financial considerations**

60. There are no financial considerations at this stage.

**Conclusion**

61. London Plan policies on CAZ, urban design, inclusive design, climate change, and transport are relevant to this application. Whilst the principle of development is supported, but a number of strategic concerns are raised, and consequently the application does not accord with London Plan Policy. The following could address these deficiencies:

- **Principle of development**: The principle of the application proposal for a new high quality educational facility that responds for the increased floorspace needs of the LSE is strongly supported by London Plan policy.

- **Urban design/LVMF**: The proposed development proposals are of a very high quality providing for an intelligent solution to inserting a new high quality building whilst creating a new public space within the dense urban fabric of The Strand Conservation Area at the centre of the LSE campus. The development height and massing will result in a minimal impact on LVMF strategic views and have a very limited impact on the setting of Lincoln’s Inn Fields and are therefore viewed as acceptable in relation to London Plan policy. The applicant should respond to the design comments relating to how parts of the facade ground floor frontage respond to the public realm at its northern end and provide assurance over the approach and options explored in maintaining Clements Inn Passage.
• **Access:** The design & access statement sets out a detailed access strategy completed by an access consultant and this is welcome, there is however a number of inconsistencies to be explained and further detail information provided before stage 2 referral.

• **Energy:** Based on the submitted energy assessment the adopted approach will result in a reduction of 157 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 52%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan, however the comments above should be addressed before the carbon savings and compliance with London Plan energy policy can be verified.

• **Transport:** The application raises no major strategic transport issues, the applicant however should respond positively to comments provided by TFL relating to additional information and conditions. Westminster Council should consider comments to relating to potential improvements of the wider public realm.

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