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FAO: Colette Hatton

Our ref: NFD/AKG/ACS/J6350

Your ref: PP- 12431875

5 September 2023

Dear Colette,

**Centre Point House, London WC2H 8AP
Application for Listed Building Consent**

We write on behalf of our client, Almacantar Centre Point Nominee No.1 Limited and Almacantar Centre Point Nominee No. 2 Limited, as bare trustees for Almacantar Centre Point LP, to submit an application for listed building consent in respect of Centre Point House, London WC2H 8AP (“the site”) for the following proposals:

“Replacement of the doorsets to apartments nos. 1-36 on levels 3, 5 and 7 of Centre Point House.”

The applications relate solely to internal physical works at levels 3, 5 and 7 of the site.

Site and Surrounding Area

Centre Point House is located within the London Borough of Camden (LBC) within the designated Denmark Street Conservation Area.

The site is a Grade II Listed Building which comprises 36 residential apartments across the upper floors on levels 3-8. Various retail uses are permitted at ground, first and second floors of the building. The Historic England listing citation states that in relation to the interiors, the ‘majority of the office retail and residential interiors lack special interest’. The citation goes on to state that in respect of the ‘East Block’, the former bank has a mosaic floor and decorative features but the ‘maisonettes above, are without internal features of note and lack special interest’.

Relevant Planning History

This section covers recently approved listed building consents relating to the Site’s interior.

On 22 September 2020, listed building consent (2020/3071/L) was granted at the site for:

“Replacement of the doorsets to apartment nos. 1-36 on levels 3, 5 and 7 of Centre Point House.”

The decision notice details the history of Centre Point House and explains that in their reasoning for granting listed building consent, they acknowledge that the proposals are to replace internal doors which do not meet the required fire safety rating. The decision notice explains that it is questionable how much significance the doors have due to the Historic England list description, however it is felt that they make some contribution to the building's quality. The Council conclude that the replacement of the doors will not affect the appearance of the building nor will it impact significant historic fabric and as a result, the proposals to replace the doors are acceptable and will not harm the special interest of the grade-II listed building.

This listed building consent has not been implemented.

On 9 August 2021, listed building consent (2021/2896/L) was granted at the site for:

“Installation of new bathroom ventilation system.”

On 6 September 2022, listed building consent (2022/1185/L) was granted at the site for:

“Fire safety and compartmentation repair works, including re-wiring of the electrical supply and renewal of sub-mains to each residential apartment and internal repair, redecoration and making good of internal common parts.”

Proposals

This application seeks listed building consent for a revised doorset design, originally approved under listed building consent ref. 2020/3071/L.

Listed building consent ref: 2020/3071/L allowed the replacement the existing doors using the same materials. However, following further investigations since the receipt of listed building consent, the appointed contractor responsible for the design and installation of the doors under the building contract, cannot provide the requisite fire safety assurances and certification for the approved doorsets.

As such, a revised design approach to replace the doorsets is proposed to ensure that the Site meets the latest requirements to provide adequate compartmentation and fire separation within the building. The design revisions are summarised below and described in greater detail on pages 4-6 of the submitted Design, Access and Heritage Statement prepared by Harris Associates:

- i. Replacement of the entrance doors and frames with materials to match the existing;
- ii. Replacement of the fixed side panel and meter enclosure with a fire-resistant plasterboard system. The fixed side panel will be faced with the same timber veneer species to match the new doors and adjacent meter cupboard door. On the apartment-facing side, the fixed panel will have a mirror/opaque glazing to the top section to match the existing, and a painted finish to the remaining plasterboard sections, to match the existing;
- iii. Replacement of the timber meter cupboard door with a fire-resistant hinged steel access panel and frame and will be faced with the same timber veneer species to match the new doors and panelling above. The only difference in external appearance will be a wider fixed section on the hinge side, as the new meter door is slightly narrower, and approximately 2-3mm wide visible frame edges. These will be painted to match the existing and faced with timber veneer.

The proposed works are considered essential to remove an identified risk at the site.

Please refer to the accompanying Design, Access and Heritage Statement and proposed drawings prepared by Onwood Products for further details on the proposals.

Planning Policy Framework

The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Act”) places a duty upon the local planning authority to determine applications affecting listed buildings and pay special regard to the desirability of preserving the building or its setting.

Sections 16, 66 and 72 of the Act imposes statutory duties upon local planning authorities which, with regard to listed buildings, require the planning authority to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. In respect of conservation areas, it is required that “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”.

The National Planning Policy Framework (“NPPF”) was published in February 2019 (amended July 2021) sets out the Government’s economic, environment and social planning policies for England, summarising all previous national planning policy advice in a single document.

The Development Plan for the site comprises:

- The London Plan 2021; and
- Camden Local Plan (2017).

In addition, supplementary planning documents relevant to the proposals include the Denmark Conservation Area Appraisal and Management Plan (2010).

Planning Considerations

Design and Heritage

Paragraph 201 of the NPPF is of relevance as it states, “where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing the optimum viable use.”

Camden Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas and listed buildings. To maintain the character of Camden’s conservation areas the council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. The Council will also resist development that would cause harm to significance of a listed building through an effect on its setting or would cause harm to its special architectural and historic interest.

As referenced above, the Historic England listed building citation for Centre Point House (ref: 1113172) states the residential interiors lack special interest’. The citation goes on to state that in respect of the ‘East Block’ the ‘maisonettes above, are without internal features of note and lack special interest’.

The proposed works are essential in ensuring the residential apartments within the listed building meet current fire safety regulations. The interior areas of the flats have been significantly updated over the course of time and do not hold any special interest for the building.

The works have been designed to be sensitive to the heritage fabric and require minimal interventions. The proposed doorsets design intent is to use the same materials and finishes for the entrance doors and frames as part the existing installation and the approved listed building consent (ref. 2020/3071/L). However, for the fixed side panel, meter cupboard door and enclosure, the materials that will be used to construct them will be changed to a fire-resistant plasterboard system, and a fire-resistant hinged steel access panel and frame, respectively. Visually, the external appearance of these elements will be provided to match the existing side panel and meter cupboard door and enclosure as closely as possible. Therefore, it is considered that the proposals will not cause any harm to the appearance of the interior of the listed building which Historic England acknowledge in their listed citation lacks special interest.

The proposals are therefore considered to comply with relevant national and local planning policy and meet the statutory tests of Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Fire Safety

London Plan Policy D12 states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that proposals are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire.

The applicant has sought to update the design of the doorsets approved under listed building consent (ref 2020/3071/L) where they no longer meet fire safety requirements. The sub-contractor responsible for designing the flat front doorsets cannot provide the requisite third party product test evidence and installation assurances for the previously approved doorsets to explicitly confirm that they will withstand fire and smoke. These assurances form part of the building and fire safety statutes that Centre Point House must satisfy.

The replacement of the doorsets will address the fire compartmentation issues identified with the existing flat doorsets. The replacements are required to protect life safety of the building's occupants by separating the apartments from the adjacent corridors on each floor. A letter from Sandhurst Fire Protection and Electrical Limited, dated 4 August 2023, has been submitted as part of this application and provides greater detail of the fire protection position.

It is considered that the proposals fully comply with London Plan Policy D12 and to not proceed with the works would be a contravention of this policy.

Conclusion

It is considered that the revised doorset proposals represent a sensitive treatment of this site within the context of the listed building and will result in the preservation of its historical significance. The works proposed are essential to deliver appropriate compartmentation to meet the fire safety regulations.

The proposals comply with the required planning policy and meet the relevant statutory tests as the proposals would result in no harm to the heritage asset. Listed building consent should therefore be granted.

Application Documentation

Please find enclosed the following documents in support of this application:

- Application forms and notices;
- Site Location Plan;
- Design, Access and Heritage Statement, prepared by Harris Associates;
- Existing Floorplans, prepared by Harris Associates;
- Proposed Floorplans, prepared by Onwood Products;
- Letter, prepared by Sandhurst Fire Protection and Electrical Limited, dated 4 August 2023;
- Product and Material Schedule, prepared by Sandhurst Construction.

There is no fee as this is a listed building consent application.

We look forward to your confirmation of the validation of this application. In the meantime, please contact either Anna Gargan or Anna Collingwood-Smith of this office should you have any questions.

Yours faithfully



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