

Address:	55 Tottenham Court Road & 16-24 Whitfield Street London W1T 2EL & W1T 2RA		3
Application Number(s):	2023/3808/P	Officer: Josh Lawlor	
Ward:	Bloomsbury		
Date Received:	12/09/2023		
Proposal:	Change of use of existing British Transport Police station and offices (Sui Generis) to Offices within (Class E), including removal of basement car parking, ramp and vehicle dock; extensions at first, second, third and fourth floors to provide additional office (Class E) floorspace; new replacement façades at Whitfield Street and Tottenham Court Road elevations; partial new replacement facades at north and south elevations; rooftop plant equipment, PV panels and green roof; external amenity areas at first, second, third and fourth floors; and associated external alterations.		
Background Papers, Supporting Documents and Drawing Numbers:			
Existing drawings 430(EX)099 PL1; 430(EX)100 PL1; 430(EX)101 PL1; 430(EX)102 PL1; 430(EX)103 PL1; 430(EX)104 PL1; 430(EX)200 PL1; 430(EX)201 PL1; 430(EX)202 PL1; 430(EX)203 PL1; 430(EX)300 PL1; 430(EX)301 PL1; 430(EX)302 PL1; 430(EX)303 PL1			
Demolition drawings 430(DE)099 PL1; 430(DE)100 PL1; 430(DE)101 PL1; 430(DE)102 PL1; 430(DE)103 PL1; 430(DE)104 PL1; 430(DE)200 PL1; 430(DE)201 PL1; 430(DE)202 PL1; 430(DE)203 PL1			
Proposed drawings 430(GA)099 PL1; 430(GA)100 PL1; 430(GA)101 PL1; 430(GA)102 PL1; 430(GA)103 PL1; 430(GA)104 PL1; 430(GA)105 PL3; 430(GA)200 PL1; 430(GA)201 PL1; 430(GA)202 PL1 ; 430(GA)203 PL1; 430(GA)204; 430(GA)300 PL1; 430(GA)301 PL1; 430(GA)302 PL1; 430(GA)304 PL2; 430(ExDT)200 PL1; 430(ExDT)201 PL1; 430(ExDT)202 PL1			
Documents:			
<ul style="list-style-type: none"> • Planning Application Form, prepared by Gerald Eve LLP; • CIL Form, prepared by Gerald Eve LLP; • Planning Statement; prepared by Gerald Eve LLP; • Site Location Plan, prepared by HaleBrown Architects; • Design and Access Statement (including servicing), prepared by Halebrown Architects; • Townscape, Heritage and Visual Impact Assessment prepared by JL Heritage and included within the Design and Access Statement; • Daylight and Sunlight Assessment, prepared by GIA; • Energy and Sustainability Statement (including BREEAM pre-assessment), prepared by TPS; • Financial Viability Assessment, prepared by Gerald Eve LLP; 			

- Noise Impact Assessment, prepared by Venta Acoustics; and
- Statement of Community Involvement, prepared by Kanda.

RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a Section 106 Legal Agreement

Applicant:	Agent:
Mayhunt Properties Limited	Mr. Kris Vasili Gerald Eve LLP One Fitzroy 6 Mortimer Street London W1T 3JJ

ANALYSIS INFORMATION

Land use details				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
E	Retail	1,640 sqm	1,383 sqm	-257 sqm
Sui Generis	Police Station	3,878 sqm	0 sqm	-3,878 sqm
E*	Office	0 sqm	4,936 sqm	+4,936 sqm
Total		5,518 sqm	6,319 sqm	+801 sqm

*Including 255 sqm GIA of affordable workspace.

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	14	0	-14
Car - Disabled accessible	0	0	0
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – commercial long stay	8	70	+62
Cycle – short stay (all uses)	0	Contribution towards 10 short stay spaces	+10

EXECUTIVE SUMMARY

- i) The proposals are similar to those approved for the site last year (Refs. 2022/0568/P “Scheme A” & 2022/2626/P “Scheme B”) in that it delivers the sustainable reuse of a vacant building in Central London. The former police station and office element of the building is currently vacant following police staff moving to alternative premises at Albany House, Broadway, on 1 May 2022.
- ii) The change of use would provide approximately 4,963 sqm of Office (Class E) floorspace. The continued employment use of the site is welcomed and complies with Policy E1 of the Local Plan, as it would secure the provision of jobs. The scheme incorporates 255 sqm GIA of affordable workspace split across ground and basement levels. This would be marketed at a 50% discount for 15 (rather than 10 years as was secured in the approved scheme). This is calculated as 20% of the former police station area at the ground and basement and 20% of the uplift in floorspace as affordable workspace. It is not based on the full internal area of the building, because a large part of the existing floorspace are essentially akin to an office use.
- iii) This scheme retains and reuses most of the existing building fabric, removes the basement level car parking, retains the ground floor retail unit, and replaces the existing louvres with windows at the Tottenham Court Road frontage. The following changes are now sought in addition to the works already approved under earlier permissions:
 - Replacement of office frontage on Whitfield Street to provide greater activation and relocation of the existing murals.
 - New, improved façades on the Whitfield Street and Tottenham Court Road frontages.
 - Additional massing at the first to fourth floors to provide 801 sqm GIA additional floorspace (an uplift of 601 sqm GIA compared to permitted Scheme B Ref. 2022/2626/P).
 - New external terraces.
 - Soft landscaping and plant equipment at roof level.
- iv) Both the murals located on the ground floor of Whitfield Street which are mounted onto moveable panels will be relocated. The murals provided visual interest to what was a blank frontage onto Whitfield Street as behind the ground floor were as cells, a charge desk, and an identity/parade room. The proposed office use seeks a more active frontage so the murals would be carefully removed and stored. There is an aspiration for them to be relocated and displayed nearby, one option being considered is in Crabtree Fields. Once details of planned works to Crabtree Fields are known in early to mid 2024, they could be re-provided within the park which is opposite the site. This would be secured through a S106 obligation.

- v) Policy H2 of the Camden Local Plan supports the delivery of residential as part of mixed-use schemes, which result in an uplift of above 200 sqm GIA. The applicant has demonstrated that introducing residential space into this scheme would compromise the office floor space. The quality of the proposed residential is considered sub-optimal as, amongst other things, it would be single aspect and lack outdoor amenity space. 200 sqm was the exact uplift of floorspace that extant Scheme B secured (a proposal that involved extensions) and therefore had no requirement for on-site housing or a financial contribution. The applicant would provide the full Payment-in-lieu (PIL) of £600,750.
- vi) The scheme complies with the development plan and would deliver additional public benefits when compared against Extant Scheme B, which was an application for additional floorspace through extensions and a change of use, and the scheme for solely change of use (Scheme A). The benefits against scheme B are summarised as follows:
- The provision of additional high-quality office space which would support job creation in the Central London Area and Central Activities Zone
 - Inclusion of 255 sqm GIA affordable workspace provided for 15 years rather than ten years (Scheme B provided 225 sqm of AW for 10 years) ;
 - The delivery of improved high quality and contextual elevations (Scheme B did not enhance the facades to the extent of this scheme)
 - Improved public realm as part of pavement widening on Whitfield Street;
 - Soft-landscaping and on-site energy generation;
 - The development continues to be car-free and would promote sustainable means of travel such as cycling (70 long stay and eight short stay cycle spaces) and walking; and
 - The provision of significant CIL contributions and additional financial contributions to be secured through a Section 106 agreement.

OFFICER REPORT

Reason for Referral to Committee: The proposed development includes a change of use resulting in the provision of more than 1,000sqm of non-residential floor-space and the construction of more than 500 sq. metres of non-residential floorspace (Clause 3(ii)).

1. SITE AND BACKGROUND

- 1.1 The existing building fronts Whitfield Street and Tottenham Court Road (TCR); it is a mixed-use comprising a retail unit (Class E) in the basement, ground and part of the first floor facing onto TCR and a former police station and divisional headquarters offices occupied by the British Transport Police (BTP) (sui generis) in the basement, ground and first to third floors onto Whitfield Street. Kirkman Place is the alleyway accessed from Tottenham Court Road, separating the site from 53-54 Tottenham Court Road. The police station element is on the ground floor, and parts of the basement are linked to the ground floor police station use (e.g., dog kennels, part plant, car parking). The basement and upper floors comprise parking, offices and other ancillary office areas. The former police station and ancillary office space is vacant, with strip-out works completed. Planning permission has already been secured for the change of use of the Sui Generis floorspace to Class E offices.



Figure 1 – The existing site

- 1.2 The southern part of the building is four storeys high, and the northern part, fronting onto Whitfield Street, is two storeys high and includes a small entrance to the ancillary office and two vehicular entrances into a ground floor loading bay and ramp down to a basement car park.
- 1.3 Whilst Marks and Spencer's Simply Food store is accessed and serviced from Tottenham Court Road, all pedestrian and vehicular access to the application premises is from Whitfield Street.
- 1.4 Commercial and residential uses characterise the surrounding area. The site is in the Charlotte Street Conservation Area and the Central London Area (i.e. Central Activities Zone). The Camden Local Plan Policies Map identifies Tottenham Court Road CLF as a Primary Frontage, Tottenham Court Road CLF Local Plan Centre, and London View Management Framework Protected Vista 2B.1 Parliament Hill Oak Tree to Palace of Westminster.

2. THE PROPOSAL

- 2.1 The proposed development comprises the following:
 - Change of use from *Sui Generis* Police Station and ancillary office use to offices (Class E) including affordable workspace on the ground floor and basement.
 - Partial demolition of the building, including facades, vehicular access ramp, first-floor plant area, first-floor flat roof and fourth-floor rooftop plant enclosure.
 - Partial extension of first, second and third floors on Kirkman Place.
 - Additional storey through fourth-floor extension, set back on the Whitfield Street elevation. Relocation of the majority of existing first-floor roof plant equipment to roof level in rooftop plant enclosure.
 - Roof terraces at first to fourth-floor levels, installation of PV panels and green roof at roof level.
 - Replacement facades on Whitfield Street and Tottenham Court Road including decorative features such as parapet detailing and stone window reveals.
 - Installation of additional windows and louvres to the north elevation.
 - Loggia balconies fronting the Whitfield Street elevation

- The removal of street furniture, pavement cut-ins, cobbled paving, dropped kerb and signage associated with the police station use and creating a wider pavement for pedestrian use.
- Cycle and bin stores, end-of-trip facilities at the basement level including showers and changing rooms.

3. RELEVANT HISTORY

The site

- 3.1 **Ref. PS9904472/R3** Redevelopment of the site to form a mixed use development with a British Transport Police Station and headquarters building on basement, ground and first to third floors (both sui generis use) with pedestrian and vehicle entrances on Whitfield Street, together with Class A1 retail use on the basement, ground and first floors of the Tottenham Court Road frontage, with plant on the first and fourth floors, as shown by drawing numbers [as listed] and all documents and letters listed in the Schedule of documentation dated 24 February 2000. **Granted November 2000**
- 3.2 **Ref. 2022/0568/P** (Scheme A) Change of use of existing British Transport Police station and offices (Sui Generis) to Offices within Use Class E(g)(i) including removal of basement car parking, ramp and vehicle dock. **Granted 07/12/2022**
- 3.3 **Ref. 2022/2626/P** (Scheme B) Extensions at second floor and fourth floor levels to provide commercial (Class E) floorspace, new external plant area and external amenity areas at third and fourth. Alterations to Tottenham Court Road elevation involve installation of double-glazed aluminium windows and grey aluminium panels at first floor following the removal of ventilation grills. Removal of existing plant room at fourth floor level and associated alterations **Granted 27/10/2022**

4. CONSULTATION

There are no statutory consultees

Local groups

Charlotte Street CAAC

- 4.1 The Charlotte Street CAAC was consulted but provided no response.

Adjoining occupiers

- 4.2 Three site notices were displayed: one on Tottenham Court Road to the front, one to the rear of the site on Whitfield Street and one on Goodge Street. The notices were displayed on 20/09/2023 expiring 14/10/2023 and the application was advertised in the local paper on 21/09/2023 (expiring 15/10/2023).

4.3 **One objection** has been received from a local resident which is summarised below:

Design

- 4th Floor — The proposed roof extension is bulkier and set further forward to the detriment of Crabtree Fields Park, from which it would be clearly visible, resulting in the loss of the feeling of openness and sky view.
- 2nd Floor Link Block — The extension now proposed is significantly higher, causing a material loss of sky view when seen from Crabtree Fields Park and Colville Place.
- The removal/relocation of the murals on the front facade. The origin of these murals is the allocation of money in the Section 106 agreement for the 2000 Consent for Public Art. The murals in place were selected following a competition organised by the Charlotte Street Association and are pixilated images of the park/garden opposite in reverse. Consequently, they are site-specific and would make no sense if removed to a different location. The murals have become very much part of the Fitzrovia scene. They are an early example of community engagement in urban regeneration, for which LBC is well-known and respected.
- Any suggestion that retaining the murals reduces light to the proposed ground floor and basement workspace is spurious. The existing elevations provide an adequate degree of light to the ground floor, all that would need to be done to maintain this would be to leave the existing murals in position and open the windows surrounding them.
- The proposal shows this level of glazing to be reduced at the upper levels by increasing the depth of the fascia between the first and second floors, so if this were left as it is, more light would enter. The basement by its very nature will never receive a large amount of natural light so it can be discounted from this defence. Any proposed associated ducts or ventilation routes terminating above the new glazed “shopfronts” elevation of the building can be run internally via the risers and do not necessitate the existing window height reduction, as the Applicant suggested. This is simply a matter of using the available structure more wisely. The large expanse of glass on the ground floor is also inefficient in overheating and does not conform to the prevailing typology on Whitfield Street, which has less glazing proportionally at ground floor level, and always with a defensible space between the pavement and the glazing.

Residential amenity

- Hours Limitation. An hour's limitation conditioned the 2022 Consent on the use of the Terraces being, 3rd-floor terrace Monday — Friday 09.00 —

19.00 hours and 4th-floor terrace Monday — Friday 09.00 — 20.00 hours. Were the Council minded to grant consent those hours limitations should be carried forward and extended to include the 2.5m deep loggia balconies on the lower floors.

Officer response:

- Officers do not consider the extensions to be bulky. The applicant has provided verified views which have been reviewed by the Council's Design and Conservation Teams.
- The link structure is not much taller than already approved and would not materially block sky views from the locally listed Crabtree Fields.
- There would be a mural relocation S106 obligation, which aims to relocate the murals to the locally listed Crabtree Fields. This would retain the link between the art and the park.
- The murals are not listed, and the Council cannot reasonably insist on them staying in the same location. They do restrict light and outlook from the reception area.
- Condition 6 requires that the terraces on the Whitfield Street elevation at first, second, third and fourth floors are only be accessed from 9am to 8pm, Mondays to Fridays. The terrace on the north elevation at first floor shall only be accessed from 9am to 7pm, Mondays to Fridays. The terrace on the Kirland Place elevation at third and fourth-floor levels shall only be accessed from 9am to 8pm Mondays to Fridays. No music would be able to be played on the terraces.
- The alteration to the level of glazing, which is to be reduced at the upper levels by increasing the depth of the fascia between the first and second floors, is acceptable. As noted above the Council cannot insist on retaining the murals in this location. The opening up of the ground floor creates an acceptable level of activation and solid-to-void ratio.

4.4 **One letter of support** was received. They supported the scheme for the following reasons:

- Support proposals for the redevelopment of the building, bringing it back into use and providing a welcome improvement to our neighbourhood.
- Welcome delivery of (affordable) workspace, new terraces and improvements to the building's façade. The new office workers it will bring to the area will encourage Camden Council to make the necessary improvements and the maintenance of Crabtree Fields opposite the building, which at present are unusable for residents and workers given their use as a rubbish tip, toilet and drug taking.

Officer Response: *It is understood that the Council's Green Spaces team has planned investment works for Crabtree Fields and will begin consultation on this planned work in 2024.*

5. POLICY

National and regional policy and guidance

[National Planning Policy Framework 2023 \(NPPF\)](#)

[National Planning Practice Guidance \(NPPG\)](#)

[Written Ministerial Statement on First Homes \(May 2021\)](#)

[London Plan 2021 \(LP\)](#)

[London Plan Guidance](#)

Local policy and guidance

[Camden Local Plan \(2017\) \(CLP\)](#)

[Policy G1 Delivery and location of growth](#)

[Policy H2 Maximising the supply of self-contained housing from mixed-use schemes](#)

[Policy C1 Health and wellbeing](#)

[Policy C3 Cultural and leisure facilities](#)

[Policy C5 Safety and security](#)

[Policy C6 Access for all](#)

[Policy E1 Economic development](#)

[Policy E2 Employment premises and sites](#)

[Policy A1 Managing the impact of development](#)

[Policy A2 Open space](#)

[Policy A3 Biodiversity](#)

[Policy A4 Noise and vibration](#)

[Policy D1 Design](#)

[Policy D2 Heritage](#)

[Policy CC1 Climate change mitigation](#)

[Climate Change](#)

[Policy CC3 Water and flooding](#)

[Policy CC4 Air quality](#)

[Policy CC5 Waste](#)

[Policy TC1 Quantity and location of retail development](#)

[Policy TC2 Camden's centres and other shopping areas](#)

[Policy T1 Prioritising walking, cycling and public transport](#)

[Policy T2 Parking and car-free development](#)

[Policy T3 Transport infrastructure](#)

[Policy T4 Sustainable movement of goods and materials](#)

[Policy DM1 Delivery and monitoring](#)

[Supplementary Planning Documents and Guidance](#)

Most relevant Camden Planning Guidance (CPGs):

[Access for All CPG - March 2019](#)

[Air Quality - January 2021](#)

[Amenity - January 2021](#)

[Artworks, statues and memorials CPG - March 2019](#)

[Biodiversity CPG - March 2018](#)

[Design - January 2021](#)

[Developer Contribution CPG - March 2019](#)
[Employment sites and business premises - January 2021](#)
[Energy efficiency and adaptation - January 2021](#)

[Planning for health and wellbeing - January 2021](#)
[Public open space - January 2021](#)
[Student housing CPG - March 2019](#)
[Transport - January 2021](#)

[Water and flooding CPG - March 2019](#)

Other guidance:

Charlotte Street Conservation Area appraisal and management strategy 2008

6. ASSESSMENT

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

7	Land use
8	Mixed-use policy, housing and viability
9	Impact on neighbouring amenity
10	Design
11	Heritage
12	Energy and sustainability
13	Transport
14	Open space
15	Community infrastructure levy (CIL)
16	Conclusion

7. LAND USE

7.1 OFFICE (CLASS E)

- 7.2 The development involves the change of use of 3,878 sqm GIA of *Sui Generis* Police Station and ancillary office use floorspace to Class E office, which is already subject to an extant permission.

- 7.3 The Proposed Development would also deliver an uplift of 801 sqm floorspace (601 sqm additional uplift compared to approved Scheme B), all of which would be used for Class E office use. The development would, therefore, provide a total of 6,319 sqm of GIA Class E office floorspace. Policies G1, E1 and 2 all support the provision of new and enhanced employment sites within the borough and particularly in highly accessible Central London locations such as the applications site.
- 7.4 No change of use is proposed for the existing ground-floor retail unit. The existing 257 sqm GIA of retail back-of-house plant room on the first floor would change to office use, with the plant equipment consolidated at the new roof level.
- 7.5 In terms of loss of the police station's use, the British Transport Police moved to alternative premises at Albany House, Broadway on 1 May 2022, leaving this part of the site vacant. There are no plans for any other branch of the Police to occupy the site, and there is no policy requirement to provide a replacement community use under Policy C2. This was confirmed in the Committee Report for the approved application Ref. 2022/0568/P.
- 7.6 Affordable workspace
- 7.7 Local Plan Policy E1 and E2, seeks to ensure that at least 20% of additional floorspace in the is affordable workspace. Camden's Draft Site Allocations Local Plan Policy KQ1(f) further supports affordable workspace provision in the Knowledge Quarter.
- 7.8 CPG employment sites and business premises (January 2021) state that the Council will seek to secure affordable SME workspaces from large-scale employment developments with a floorspace of 1,000 sqm (GIA) or more. Paragraph 37 of the CPG defines affordability as 20% of floorspace at 50% of market values. Paragraph 38 of the CPG states that the Council will also consider alternative suggestions for providing affordable workspace.
- 7.9 The police divisional headquarters offices are over first to third-floor levels and are accessed from the public highway via an entrance. Therefore, the use is very similar to a conventional Class E office space from the first to the third floor.
- 7.10 Therefore, operational development is restricted to the former police station element over the basement and ground floor, reflecting that the upper floors are already offices in physical terms. This also represents the only area where the potential for 'intensification' could logically be suggested. The total proposed GIA of the ground floor and basement is 1077 sq m, and 20% of this is 215 sq m.
- 7.11 The scheme delivers the 255 sqm of affordable workspace, which was secured cumulatively as part of Schemes A and B (ref. 2022/0568/P and 2022/2626/P). The affordable workspace would be located at ground and basement levels and offered at a 50% discount for 15 years (Schemes A and B provided it for ten years). The

additional 5 years proposed by the applicant is welcomed and is regarded as a suitable offer in response to the additional 801sqm of office floorspace space provided as part of this scheme.

7.12 The Council's Inclusive Economy Team were consulted on the affordable workspace offer in this application. They highlighted the importance of considering how the applicant will make the space available to a growing SME. The Council can assist in locating a prospective tenant through partners like Camden Collective or LABS, who could signpost businesses graduating from their spaces. The applicant could also use the local Business Improvement District (BID) or Fitzrovia Partnership to identify prospective tenants and consultation with the council to locate a tenant is incorporated into the affordable workspace plan.

7.13 Employment and training

7.14 In line with policy E2, an employment and training plan is secured with the proposal to maximise local employment opportunities and provide necessary retraining. This will include work placement opportunities (to be agreed upon but at least two end-use apprenticeships) for the end-use phase; liaison with the Good Work Camden Programme and Camden Steam Commission for the end-of-use phase; and apprenticeships secured for the end-use stage of the development, to be paid at a minimum of the London Living Wage rate.

7.15 An affordable workspace plan allows the owner to work with the Council to ensure the space's delivery, proper occupation, and management. This includes consultation with the council to locate a prospective tenant through partners like Camden Collective or LABS, who could signpost businesses graduating from their spaces. The applicant could also use the local Business Improvement District (BID) or Fitzrovia Partnership to identify prospective tenants

7.16 The developer will also confirm their commitment to ensuring the site offers local employment benefits in the long term by:

- Joining the Council's Inclusive Business Network and promoting this and good employment practices to occupiers.
- Potentially Working with Camden Learning/STEAM on school engagement for the office space (if any future occupiers come under the STEAM definition).
- Working with their occupiers to offer work experience placements.
- Working with Good Work Camden/the Council's Inclusive Economy Service to recruit for vacancies locally.
- Work with Good Work Camden/the Council's Inclusive Economy Service to offer specific opportunities to those furthest from the labour market, possibly through supported employment initiatives.

7.17 Employment and training (construction phase)

- 7.18 Construction Phase
- 7.19 Apprenticeships - as the build cost for this scheme will exceed £3 million the applicant must recruit **1 construction apprentice paid at least London Living Wage per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG**. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Once we have the exact build cost, we can determine the number of apprentices. The build costs are estimated at £16.7 million, which is rounded up to provide 6 construction apprentices.
- 7.20 Local Recruitment – our standard local recruitment target is **20%**. The applicant should work with the Kings Cross Construction Skills Centre to recruit to vacancies, advertising with us for no less than a week before the roles are advertised more widely.
- 7.21 Local Procurement – The applicant must also sign up for the **Camden Local Procurement Code**, as per section 61 of the Employment sites and business premises CPG. Our local procurement code sets a target of **10%** of the total value of the construction contract.
- 7.22 Construction Work Experience Placements - The applicant will provide one construction work placement opportunity (this is one placement per 500 sqm of non-residential floor space) of not less than two weeks each, to be undertaken throughout the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 69 of the Employment sites and business premises CPG.
- 7.23 The applicant will provide a local employment, skills and local supply plan to deliver the above requirements before commencing on-site, per section 63 of the Employment Sites and Business Premises CPG.

8. MIXED USE POLICY, HOUSING AND VIABILITY

- 8.1 Policy H2 of the Local Plan aims to maximise housing supply. It seeks to achieve commensurate levels of self-contained housing whenever non-residential development is proposed to ensure a balance of uses across the Borough. The policy requires that where more than 200 sqm GIA of non-residential development is proposed in the Central London Area, 50% of the additional floor space must be delivered as self-contained housing with an appropriate mix, including affordable housing where relevant. Policy H2 also states that where housing is required as part of a mix of uses, Camden will require self-contained housing to be provided on-site, mainly where 1,000 sqm (GIA) of additional floorspace or more is proposed. The requirement to deliver affordable housing on site is subject to a set of criteria set out in Policy H4 of the Local Plan and the Housing CPG.
- 8.2 The development seeks to provide an uplift of 801 sqm GIA of non-residential floorspace, thus generating a residential floorspace requirement of 400.5 sqm GIA under Local Plan Policy H2.
- 8.3 The applicant has considered the provision of residential on-site. As part of this exercise, a detailed study was undertaken based on a total uplift of 801 sqm GIA and required 400.5 sqm (50%) of residential floor space, equating to 4 residential units. Policy H2 states that when considering whether housing should be provided on site and whether the most appropriate mix of housing and other uses is required, the Council will consider criteria (a) to (e).
- 8.4 The criteria relevant to the application are a, b and d:
- a. the character of the development, the site and the area;
 - b. site size, and any constraints on developing the site for a mix of uses;
 - d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;
- 8.5 In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, the Council will consider criteria (a) to (e) (above) and the following additional criteria:
- f. the need to add to community safety by providing an active street frontage and natural surveillance;
 - g. the extent of any additional floorspace needed for an existing user;
 - h. the impact of a mix of uses on the efficiency and overall quantum of development;

- i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

- 8.6 Two alternative layouts for the residential floorspace over first and second floor have been analysed. New ground floor entrances onto the northern edge of Whitfield Street leading to a new dedicated core including lift and stair. The residential entrance can only be from Whitfield Street side and the required area and massing assumes it would be configured as a vertical stack to the northern boundary. Due to the limited access from Whitfield Street, access to the cycle store and refuse becomes limited. The existing UKPN access and extract duct penetration creates logistical challenges. There are several required entrance at street level onto Whitfield Street, which will not create an active and well-considered streetscape, and it would harm the architectural quality of the Whitfield Street elevation.
- 8.7 The addition of residential entrances on Tottenham Court Road is suboptimal due to several factors. The existing staircase facing onto Tottenham Court Road serves as a secondary (escape) staircase for the flats. It is not possible to position the lift in this location due to the existing staircase arrangement (i.e. the staircase serving the flats is sandwiched between two existing staircases. Using the bottom staircase to access the flats would involve significantly more demolition and new work to both staircases.
- 8.8 The applicant has explored using the primary access from Kirkman Place utilising the existing staircase and a new lift, with a new external ramp access to negotiate the existing level differences. The lift and access to the lift would be located within Marks & Spenser's demise, and the new ramp will be within the Public Highway, creating highways issues.
- 8.9 The applicant has shown 2 x 1 bed flats, which are single aspect. This frontage creates issues of poor air quality and noise. It is not possible to provide private outdoor amenity space due to design and heritage considerations. It would result in a sub-optimal internal layout with a long corridor. It would significantly impact light to the office floorplate.
- 8.10 Introducing a residential entrance on the Whitfield Street elevation would create four separate ground-floor entrances. This would result in a fragmented ground floor and the reception area would also need to reduce significantly in size to its detriment. It would further impact how the cycle and changing facilities would be accessed.
- 8.11 Adding a residential core would make the floorplate configuration less efficient and create space planning challenges for prospective occupiers.
- 8.12 The building is relatively narrow and long. Including residential at the northwest side of the floorplate would mean that natural light would be blocked along two elevations.

There would be a material reduction in natural light from Whitfield Street, with fewer windows and fewer aspects on to locally listed Whitfield Street and Crabtree Fields.

- 8.13 The inclusion of residential would reduce the provision of outdoor terrace space. The reduction in terrace space would have a knock-on effect on ESG credentials.
- 8.14 Savills act as office agents for the applicant and have provided a report which points out that the inclusion of residential within the scheme would have a negative impact on the leasing prospects for the building, suppressing Estimated Rental Values, elongating leasing voids and rent-free periods, and most likely limiting the prospects of both pre-letting the building and securing a single tenant.
- 8.15 The office agents believe that from a marketability perspective, the scheme already permitted which has full office floorplates on the first and second floor with full-width frontages overlooking Crabtree Fields, and a wider ground floor entrance, would be more appealing. Including residential space would also have more potential for overlooking existing residential uses on Goodge Street.
- 8.16 There are a range of issues with the quality of the proposed housing. The west-facing unit would be single aspect. On first floor the east-facing unit would be dual aspect; however it would have a deep floorplan which overlooks first-floor plant equipment. It is challenging to provide private amenity space. The acoustic separation between the office and residential will be challenging because the existing slab is retained.
- 8.17 On the second floor the units would be single aspect with no private amenity space. The office terrace is also above the west facing unit, creating amenity issues.
- 8.18 The council believes that self-contained housing would not be compatible with the operational requirements of the proposed non-residential use (Policy H2 criteria d). The provision of housing would impact the mix of uses on the efficiency and overall quantum of development (criteria h). An alternative approach could better meet the objectives of policy H2 and the Local Plan (criteria j).
- 8.19 The full PiL based on the formula set out in policy and guidance would be £600,750 and the calculation is shown in the table below. The applicant has agreed to make the full payment of £600,750 which would be secured by S106 Legal Agreement.

Total additional floorspace proposed	801 sqm
Self-contained housing floorspace target	400.5 sqm
On-site self-contained housing proposed	0 sqm
Self-contained housing shortfall	400.5 sqm
Payment-in-lieu (PIL) for housing (shortfall in sqm x £1,500)	£600,750

9. IMPACT ON NEIGHBOURING AMENITY

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

9.2 The Amenity CPG, and the BRE Guidelines focus on impacts to residential properties with protection of their amenity being given greater weight. Paragraph 3.7 of the CPG states:

“Although it is normally only residential uses that are assessed, there may also be non-residential uses, existing nearby or proposed as part of the application, that are particularly sensitive to light and so justify a report.”

Daylight and sunlight

9.3 A Daylight, Sunlight and Overshadowing Report has been submitted as part of the application which details any impacts upon neighbouring properties.

9.4 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.

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 if the resulting scheme would provide acceptable living standards.

Methodology

9.6 The methodology and criteria used for the assessment are based on the approach set out by BRE guidance. The report makes use of several standards 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 (a reduction of more than 20%) its former value.*

- **No Skyline (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 to 0.8 times its existing value (a reduction of more than 20%) before the daylight loss is noticeable.*
- **Annual Probable Sunlight Hours (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 of March, and the area which can receive some sun on the 21st of March is less than 0.8 times its former value.

Assessment

9.7 *Summary*

9.8 Of the 136 windows assessed for VSC, 107 (78.7%) would meet the BRE Guidelines. Of the 73 rooms assessed for NSL, 54 (74%) would meet the BRE Guidance. With regards to sunlight (APSH), of the 33 rooms assessed, 24 (72.7%) would meet the BRE Guidance.

9.9 With regards to sunlight (APSH), the scheme would achieve a good level of BRE compliance given the central urban London location. Of the 33 rooms assessed, 24 (72.7%) would meet the BRE Guidance.

9.10 Where transgressions from guidance occur for daylight and sunlight these are primarily associated with those properties which have external balconies. In most cases, the windows and rooms which face the site are understood to likely serve secondary rooms such as bedrooms which have a lower expectation for daylight (NSL) and sunlight (APSH). The main habitable spaces of these properties, for example 53-54 Tottenham Court Road, such as living rooms, likely face away from the site and would not be impacted by the scheme.

9.11 Existing windows with balconies above them typically receive less daylight as 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 an assessment of whether it is the balcony, rather than the size of the new obstruction (the proposed development), that is the main factor in the relative loss of light.

9.12 *62 Tottenham Court Road and 5-7 Goodge Street*

9.13 For 62 Tottenham Court Road 61% of windows comply with BRE guidelines and the remaining five windows see minor transgressions of between 21.7% and 26.2%. For 5-7 Goodge Street two windows of the four assessed would see minor transgressions almost identical to those at 62 Tottenham Court Road.

9.14 *9 Goodge Street*

9.15 For 9 Goodge Street two of the four assessed see transgressions of 37.2% and 31.1% against a 20% BRE target which is moderate. When considering the retained VSC level, the windows will retain 9.3% and 12.6% respectively, which could be considered noticeable. When considering the without balcony assessment for 9 Goodge Street, both the impacted windows will experience minor alterations of 25.6% and 22.4% respectively. Both windows will also retain 15.7% and 19.8% VSC.

9.16 *11-13 Goodge Street*

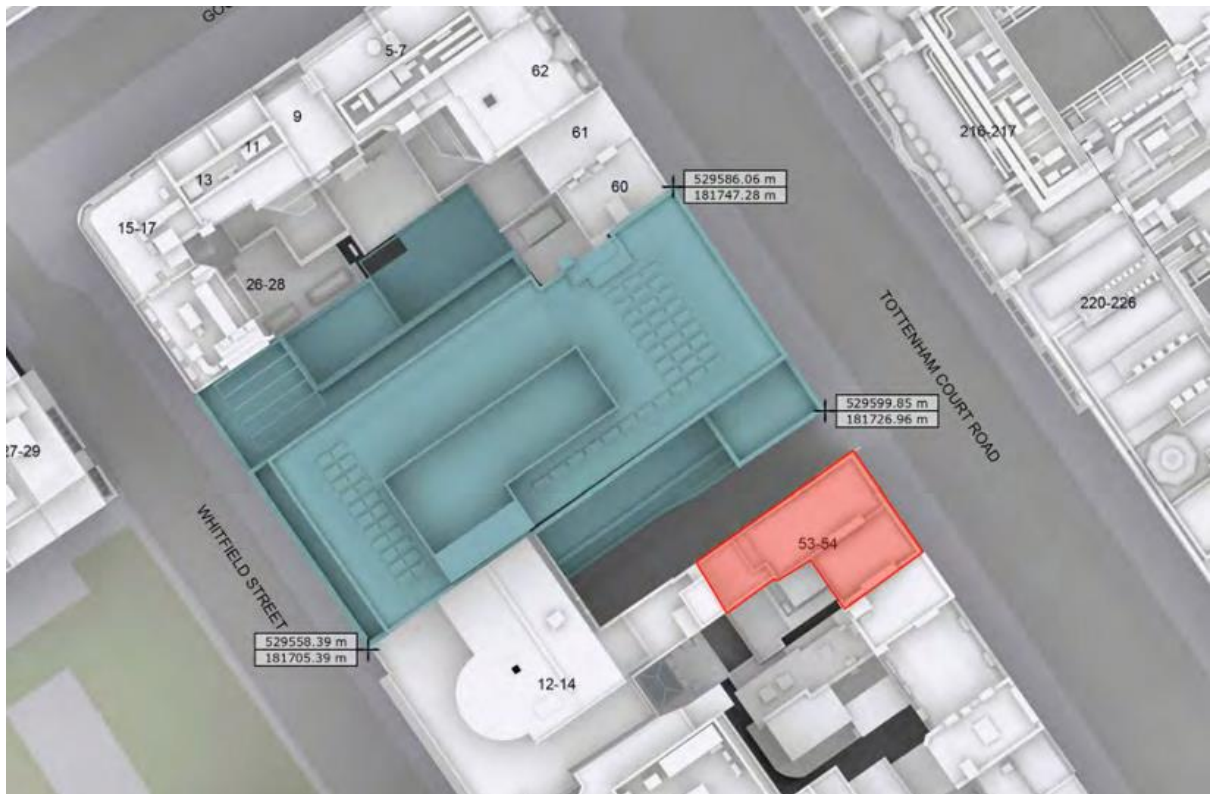
9.17 Of the 23 windows assessed for VSC, 12 windows (52.2%) will comply with BRE Guidelines. Four of the 11 remaining windows, see transgressions between 20.4% and 29% (against a 20% BRE target) which are minor. A further window will experience a transgression of 38.8% which is moderate. The remaining six windows will experience transgressions between 41.7% and 72.2% which is major.

9.18 When considering the retained VSC levels, one window will retain 19.1% which is reasonable for an urban area. The remaining 10 windows retain between 1.5% and 13%. However, nine of these ten windows have existing VSC levels below 15%, between 5.4% and 14.1%. The remaining window has an existing VSC of 18.3% which will go to 13%.

9.19 The windows which experience the largest impacts in VSC are understood to serve living kitchen diners (LKD). There are five windows which serve the LKD room. When considering the room assessment, the first floor LKD will experience a 42.2% reduction as the room will retain 5.2% against an existing VSC of 9%. The second floor LKD will experience a 33.1% reduction and retain 9.5% VSC against an existing VSC of 14.2%. The remaining two LKDs will meet the BRE criteria for VSC.

- 9.20 Regarding NSL, three (37.5%) of the eight rooms will meet the BRE Guidelines. One of the five remaining rooms will experience a transgression of 27.4% which is minor. A further room will experience a transgression of 39.5% which is moderate. The remaining three rooms will see alterations between 47.4% and 54.2% which is major.
- 9.21 When considering the retained sky visibility, two of the five impacted rooms will retain 55.4% and 72% NSL. As such, over half the room will have a view of the sky at the working plane. Both rooms are understood to serve bedrooms. The remaining three rooms serve LKDs and will retain between 16.8% and 39% which could be considered noticeable.
- 9.22 Sunlight (APSH)
- 9.23 Three out of eight will meet the guidance (37.5%).
- 9.24 Four of the five remaining rooms will retain more than the BRE target of 25% APSH for annual sunlight with levels between 27% and 43%. The remaining rooms are understood to serve a bedroom and will retain 20% annual PSH.
- 9.25 For winter sunlight, the five rooms will retain levels between 0%-3% winter sunlight against a 5% BRE target. Three of these rooms have winter sunlight levels below or at 5% in the existing.
- 9.26 The remaining two rooms serve the LKDs, both these rooms will exceed the annual APSH target of 25% with 27% and 43%.
- 9.27 The windows that serve these LKD rooms are located under overhanging balconies. When considering the no-balcony assessment, 10 of the 11 window which experienced an impact will now see minor adverse transgressions between 20.4% and 29%. The one remaining window will experience a 31.3% loss which is moderate.
- 9.28 When considering the room assessment without the balconies, the first floor LKD will experience a 27.4% alteration which is minor. The second floor LKD will experience a 23.6% alteration which is minor. The remaining two LKDs will meet the BRE criteria for VSC.
- 9.29 *15-17 Goodge Street*
- 9.30 There are two rooms relevant for daylight analysis in accordance with the BRE Guide, one rooms (50%) will meet the BRE Guidelines for both VSC and NSL. Of the two windows assessed for VSC, both (100%) will comply with the BRE Guidelines for VSC.
- 9.31 *53-54 Tottenham Court Road*

- 9.32 Three rooms (33.3%) will meet the BRE Guidelines for both VSC and NSL. Of the 15 windows assessed for VSC, 10 windows (66.7%) will comply with BRE Guidelines.
- 9.33 Two of the five remaining windows see transgressions of 22.1% and 23.9% against a 20% BRE target which is minor. The remaining three windows will experience transgressions between 30.6 and 32.5% which is moderate.



Map of 53-54 Tottenham Court Road in red

- 9.34 When considering the retained VSC levels, none of the five windows will retain a VSC more than 15%. The windows will retain between 7.2% and 14.5%. It is noted that two of the windows already have existing VSC levels below 15% and therefore which is considered low even by central London standards. The other three windows have existing VSC levels between 15.1% and 20.9% and although reduced to below 15% the reductions are not more than 30% which although noticeable is not regarded as a significant.
- 9.35 Officers have reviewed a floor plan related to an application on the first floor in 2018 (Ref. 2018/4674). While the rooms are not annotated it appears that the main habitable spaces of the apartments have windows that face towards the site and towards Tottenham Court Road. It appears that the site facing windows are likely to serve bedrooms rather than main habitable rooms.
- 9.36 Regarding NSL, there are nine rooms relevant for assessment. Three (33.3%) of the rooms will meet the BRE Guidelines. Three of the six remaining rooms

will experience transgressions between 30.3% and 34.1% which is moderate. The remaining three rooms will see alterations between 43.6% and 52.5% which is significant. Overall, most of the windows within 53-54 Tottenham Court Road will meet the BRE VSC criteria. Where there are impacts beyond guidance, these are located facing Kirkman Place (the alleyway) between the proposed site and the building which is in very close proximity (circa 4m). Due to this, some larger alterations may be unavoidable for any meaningful massing on site.

9.37 For NSL, most of the impacted rooms have very low existing levels of sky visibility. This results in disproportionate percentage alterations. However, the results for three of the rooms are likely to be noticeable.

9.38 This property will see losses in daylight (VSC and NSL) which will be noticeable to some of the rear facing rooms. However, given the close proximity and the location of windows facing in the courtyard/light-well to the development site, daylight and sunlight losses to this property are likely unavoidable for any meaningful massing on site.

9.39 *12-14 Whitfield Street*

9.40 Of the 16 windows assessed for VSC, 12 windows (75%) will comply with BRE Guidelines for VSC. Two of the four remaining windows see transgressions of 21.4% and 22.7% against a 20% BRE target which is minor. The remaining two windows will experience transgressions between 31.3% and 34% which is moderate.

9.41 When considering the retained VSC levels, the four windows which see transgressions will retain between 15.5% and 25.2% which has been considered acceptable within Camden. In each of these cases, the four impacted windows are understood to serve three rooms served by additional windows.

9.42 *Noise*

9.43 The application is supported by a Noise Impact Assessment, prepared by Venta Acoustics. An existing background noise survey has been carried out to assess the existing noise environment experienced by the closest existing residential receptors. Regarding noise from plant equipment, an assessment has been undertaken to establish the maximum external noise levels from the proposed building services plant. The assessment outlines design criterion for plant noise emission limits, based on Camden's planning requirements and the information gathered from the survey. The assessment also establishes the predicted noise generated from people using the external terraces.

9.44 The Noise Impact Assessment has been assessed by the Council's Environmental Health Officer who has confirmed that, subject to the

recommended mitigation measures, the plant equipment would comply with Camden's noise criteria guidance and would not have a significant adverse noise impact.

- 9.45 The Noise Impact Assessment also concludes that the anticipated noise generated from people using the roof terrace would also be anticipated to have no adverse impact on amenity. To ensure that this is the case, the proposed terraces would have limited hours of use and would only be able to be used by office tenants.
- 9.46 The terraces on the Whitfield Street elevation at first, second, third and fourth floors can be accessed from 9am to 8pm, Mondays to Fridays. The terrace on the north elevation at first floor would be accessed from 9am to 7pm, Mondays to Fridays. The terrace on the Kirkland Place elevation at third and fourth floor levels would be accessed from 9am to 8pm Mondays to Fridays. No music would be able to be played on the terraces.
- 9.47 In noise terms, it is concluded that the development would protect neighbouring amenity and is therefore in compliance with Policies D13 and D14 of the London Plan and Policies A1 and A4 of the Camden Local Plan.

10. DESIGN

- 10.1 The application proposes extensions to the existing building, together with new facades, new external terraces and a plant enclosure.
- 10.2 The existing building was designed by Colwyn Foulkes and Partners and completed in 2001. The frontage on to Tottenham Court Road is 4 storeys, with retail usage at ground floor that is primarily glazed. Above ground floor the façade is of a low quality, lacking depth, compromised by ventilation requirements and without the rich architectural detailing found locally.
- 10.3 The Whitfield Street frontage currently includes a largely solid ground floor, reflecting its former use as a police station. The security requirements necessitated a solid frontage, which contains 2 ceramics murals with images reflecting Crabtree Fields opposite. The simple elevation above contains small windows within plain brickwork.
- 10.4 The proposed design rationalises the massing of the existing building to create more unified volumes in comparison to the consented scheme. In summary, this involves; minor increases to the massing in the internal courtyard, widening of the 3rd floor on to Whitfield Street, increased coverage of the 4th floor (existing rooftop level) and inclusion of roof terraces for external amenity.
- 10.5 On Tottenham Court Road, the increased footprint of the 4th floor forms part of the redesigned façade. The elevation is composed of 3 bays of 5 storeys,

stepping down to 4 storeys adjacent to Kirkman Place to the south. These heights are considered to sit comfortably with the wider streetscene.

- 10.6 Facing Whitfield Street, the existing breakdown in heights is maintained through a proposed building form that is part 3 floors and part 4 floors, with a set-back fourth floor visible behind a terrace. This broadly reflects the heights found locally, with the additional height of the 4th floor mitigated by its set-back from the frontage and limited in visibility.
- 10.7 A centralised plant enclosure is proposed at roof level alongside PV cells and a green roof (secured by condition 12). The plant enclosure's size has been minimised, with a design that articulates the volume in a clear form with a rhythm to the facade that is developed from the windows in elevations below.
- 10.8 Whilst the building height is increasing, it still sits well below the threshold plane of the London View Management Framework (LVMF) protected vista 2B.1 (Parliament Hill at the prominent oak tree to the Palace of Westminster).
- 10.9 Across the development the street facing elevations are to be replaced, improving the appearance and thermal performance with limited alterations to the structure behind. The design of the new elevations includes the use of light-coloured brick, stone lintels, masonry details and stone surrounds to the windows. This is an improved approach, resulting in a higher-quality design.
- 10.10 The articulation of the façade on to Tottenham Court Road has been developed through study of the local frontages, with a fenestration rhythm that reflects the neighbouring character. This will have more depth than the existing, with feature reveals to add visual interest to the elevation and a considered 'top' of the composition. Additional feature details such as a decorative parapet and stone window reveals further reference the immediate context.
- 10.11 The facade onto Whitfield Street has been improved with increased sizes of upper window openings and depth and texture to the new brickwork. The openings maintain a strong rhythm, with detail to the reveal and window head that reflects the local character. Loggia terraces as external amenity are provided to improve the interaction with Crabtree Fields. On ground floor, new glazing is proposed, with office entrances, including to the cycle store providing activity on the street.
- 10.12 There would be a new fourth floor extension on part of the Kirkman Place elevation. The lower floor windows would be replaced, and louvres added. On the third floor, the window cills are to be dropped to create full-height access doors onto a new roof terrace, which replaces an existing metal roof.
- 10.13 On the north elevation, several modest extensions are proposed at lower floors and new masonry would be introduced on the upper floors where the new fourth

floor extension is proposed. On the first floor is an enclosure housing the plant equipment for the retail unit.

- 10.14 New extensions incorporate extended windows with new high-level louvres on the second and third floors. The new windows' proportions match those of the Tottenham Court Road and Whitfield Street elevations. New 'ghost' windows to the eastern gable wall provide visual interest, and brick will match the existing colour and texture.
- 10.15 There is a dedicated entrance for the affordable workspace from Whitfield Street and a void cut-out to access the basement. The cycle store would be accessed from the ground floor and the refuse store would be relocated to the ground floor with access from Whitfield Street.
- 10.16 Most of the retail unit plant equipment would be moved to the main roof with new intake and exhaust ducts concealed within a planter. The rooftop plant enclosure has been set back on all sides to minimise visibility in long views. The structure has limited visibility as part of the roof can be seen along Tottenham Court Road. This is not harmful to the conservation area as it could only be glimpsed in certain positions along the eastern side of Tottenham Court Road. The enclosure has also been designed to be a rational architectural volume incorporating the lift overrun and staircase from the main core. The enclosure would be clad in feature PPC metal panels to reflect the proportions of the new top-floor windows in the new facades onto Tottenham Court Road and Whitfield Street.
- 10.17 The roof would have planters and 116.6 sqm sedum and wildflower roofs. Public realm improvements on Whitfield Street include removing street furniture and reinstating the pavement to the full width by removing the approximately one-metre pavement cut-ins previously used as police vehicle parking. The expanse of cobbled paving and dropped kerb to the vehicle access into the building would be removed and replaced with paving for pedestrian use.



Proposed view Tottenham court Road



Proposed view Whitfield Street

10.18 Mural relocation

10.19 An existing mural is located on the ground floor of the Whitfield Street elevation. The mural forms two elements, each measuring 4.14m (w) x 2.83 (h). Paul Evans designed them and depicted the Crabtree Fields Park scene.



Image of the murals on ground floor



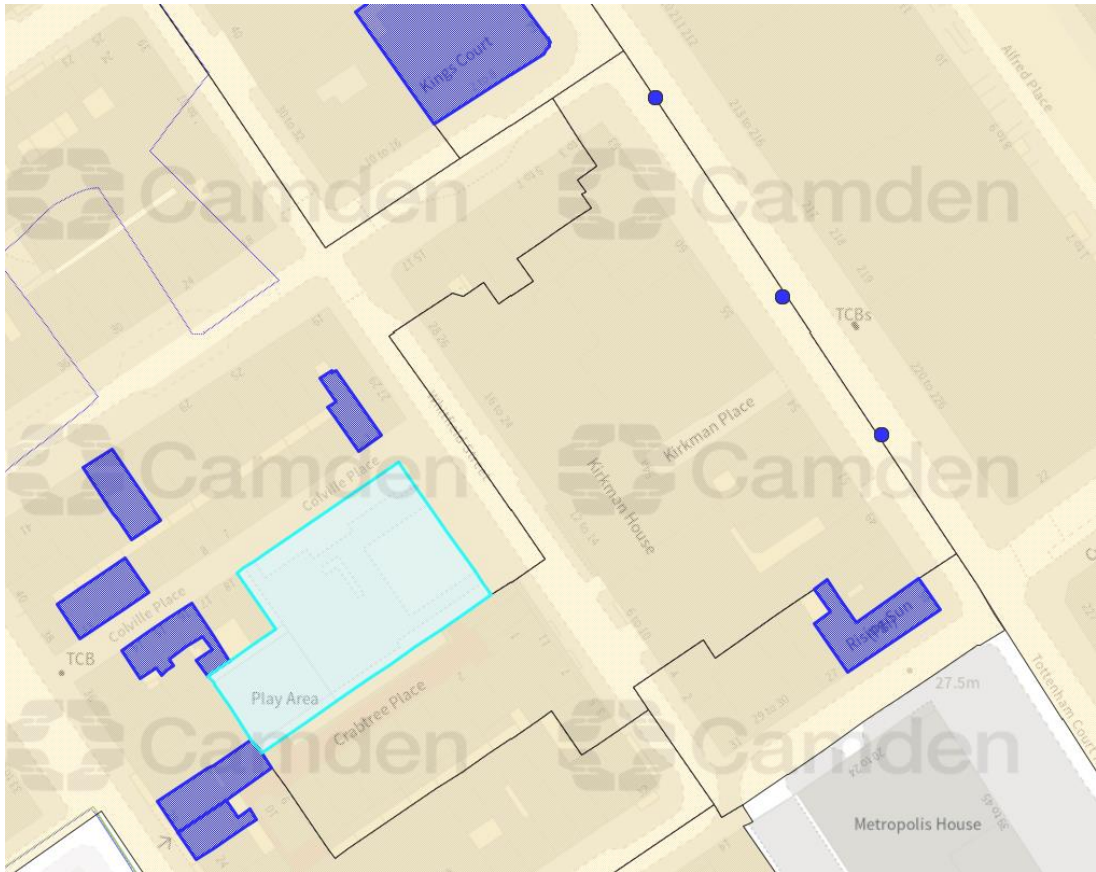
Front view of murals

- 10.20 The provision of this public art formed part of the November 2000 permission (Ref. PS9904472) in relation to the current building. Section 3.8 of the associated Section 106 Agreement states that this must be retained and maintained in that position through the duration of the use of the development. Officers consider that the murals must be retained whilst the police station is operating from the building but the requirement to retain falls away when that use left.
- 10.21 The blank frontage was a functional requirement of the British Transport Police, and this provided an opportunity for the mural. Behind this mural were a charge desk, eight holding cells and an identity / parade room.
- 10.22 One mural is applied to a concrete wall and the other to blockwork, so that each element would be able to be moved or relocated as single panels. The applicant has explored whether the murals could be maintained in their current position, or provided within Crabtree Fields as part of planned improvement works, along with a range of other options including locating them within the new office lobby.
- 10.23 Maintaining the murals in their current location raises several issues for the applicant including limiting space for doors and the light entering office accommodation. These impacts are noted in the planning balance on this issue; we also recognise that the murals are not listed and provided a specific role to the police station.
- 10.24 An alternative option considered would relocate the panels to the rear wall of Crabtree Fields. A benefit would be that they would retain their visual link with the park (locating them along Kirkman Place, another location considered, would sever this link).
- 10.25 For the reasons set out above, principally because the panels were provided as a functional requirement of the former police station use which is not shared by an office use, it is proposed to carefully remove the murals, safely store them, and then allow for them to be installed within Crabtree Fields as part of planned improvement works or an alternative location as to be agreed by the Council. This would be secured as part of a Mural Relocation Plan obligation within the Section 106 Agreement.
- 10.26 There would be several stipulations included within this Mural Relocation Plan including that the applicant should have agreement with the Councils Green Spaces Team and be able to cover the costs of installation and maintenance. The applicant has been advised to apply an anti-graffiti protective layer or an easy wash glass screen if it is installed in Crabtree Fields. There would be a cascade inserted into the agreement which stipulates that if the applicant is unable to find agreement with the Green Spaces team for installation within Crabtree Fields within a period of two years then they should be installed on Kirkman Place, then as a last resort the mural should be located to the new office lobby.

11. HERITAGE

Designated and non-designated heritage assets

- 11.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special regard must be given to the preservation of a listed building, its setting or its features of special architectural or historic interest. Section 72 of the same Act sets out that special regard must be given to preserving or enhancing the character and appearance of a conservation area.
- 11.2 The site is located within the Charlotte Street Conservation Area and lies directly adjacent to Sub Area 4 of the Bloomsbury Conservation Area. The site is a 2002 building of four storeys that makes a neutral contribution to the Charlotte Street Conservation Area. There are listed buildings in the vicinity of the Site, including:
- The Rising Sun Public House, 46 Tottenham Court Road (Grade II);
 - 1 Colville Place (Grade II).
- 11.3 There are also listed buildings in the wider vicinity of the site however these are far enough away so as not to be impacted by the proposals:
- 11, 11a 12 and 13 Colville Place (Grade II);
 - 14, 15 and 16 Colville Place (Grade II); and
 - 26 and 28 Charlotte Street (Grade II).



Map of heritage assets (Listed buildings in blue and locally listed building on turquoise)

- 11.4 In respect of the Rising Sun Public House (Grade II), there would be no potential effect on this asset's significance or the experience of its setting. This is due to its distance from the site, the nature of the intervening townscape, and the proposed design's contextual nature.
- 11.5 In respect of 1 Colville Place, the remodeling of the Whitfield Street elevation, including the additional proposed massing (height to frontage), would preserve the asset's significance and setting.
- 11.6 Turning to the proposal's impacts on the Charlotte Street Conservation Area and adjacent Bloomsbury Conservation Area. The significance lies in the conservation area's architectural and historic significance. On the Tottenham Court Road frontage, the existing building stands a storey taller than the surrounding buildings four-storey buildings, although its taller floor-to-ceiling heights mean that it itself only contains four storeys. The additional storey is visually recessive by being faced with cream-coloured masonry instead of brick. At the Whitfield Street end, the existing building is faced in brick and is two storeys taller than the building to its north and half a storey taller than the building to its south.

- 11.7 The more generally 19th-century proportions of the proposal, with suitable materials, such as high-quality bricks, as indicated, would create a more sympathetic contributor to the conservation area. The improved materiality will be complemented using alternating mortars, stone lintels, stepped corbelling at the parapet and varied brick bonds. The additional bulk is also offset on the Tottenham Court Road end by the reorganisation of the plot widths, although this increased narrowness does tend to emphasise the increase in height.
- 11.8 Additionally, there are sufficient examples of taller buildings in the vicinity for this additional example not to stand out, including the two listed buildings mentioned above, and this part of the conservation area does not present a notably consistent character in terms of style or parapet line.
- 11.9 Overall, the proposal complies with policy and guidance in relation to heritage and townscape. The new elevational designs would enhance the character and appearance of the Charlotte Street Conservation Area and Bloomsbury Conservation Area.

12. SUSTAINABILITY AND ENERGY

- 12.1 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.
- 12.2 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.

Energy reduction targets

- 12.3 To minimise operational carbon, development should follow the energy hierarchy in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2). 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).
- 12.4 Paragraph 8.20 of the Local Plan (supporting text to Policy CC1) states that all developments involving five or more dwellings and/or more than 500 sqm gross internal floor space are encouraged to assess the embodied carbon emissions associated with the development within the energy and sustainability statement. The application is supported by an Energy and Sustainability Statement which assesses the scheme against carbon reduction targets.

- 12.5 In this case, the development exceeds the policy target of 35% reductions, achieving an overall on-site reduction of 68.92% below Part L requirements as shown in Table below.

Policy requirement (on site)	Min policy target	Proposal reductions
Total carbon reduction: LP policy SI2 and LP CC1	35%	68.92%
Be lean stage (low demand): LP policy SI2	15%	34.34%
Be green stage (renewables): CLP policy CC1	20%	34.58 %

- 12.6 With respect to 'be lean', the design of the building has sought to reduce energy demand by incorporating measures including optimally sized windows, high-performing building materials, automatic lighting controls and mechanical ventilation systems with heat recovery.
- 12.7 With respect to 'be clean', the proposals include the use of highly efficient heat pump technologies, hot water supplied with electric point of use, time and temperature zone controls and use of a Mechanical Ventilation Heat Recovery (MVHR) system.
- 12.8 With respect to 'be green', the proposals would incorporate solar (photovoltaic) panels to provide renewable energy and air source heat pumps (ASHPs) to provide efficient cooling and heating (details secured by condition 9).
- 12.9 The energy provisions are to be secured through Energy Efficiency & Renewable Energy Plan

Climate change adaption and sustainable design

- 12.10 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent.
- 12.11 The BREEAM Pre-Assessment and credits achieved a score of 70%, which is currently targeted. This is equivalent to an 'Excellent' rating. The 70% mark shows the pathway to achieve excellent, with a potential score of 79%.

- 12.12 The proposal would implement a fabric-first approach, whereby most of the existing structural frame and floor slabs are retained to reduce waste and energy consumption. Any demolition aggregate would be reused on-site for new slabs or recycled into new elements off-site. Condition 13 requires that 95% of waste to be reused or recycled.
- 12.13 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure that development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.
- 12.14 In this case, the development incorporates the provision of planters and 116.6 sqm sedum and wildflower roofs integrated with solar panels, which would enhance the site's biodiversity and reduce water runoff. Details of this system will be secured by condition 11. The roof planting palette would include a mix of sedum, wildflower and meadow grass varieties.
- 12.15 Condition 9 will secure water efficiency measures, ensuring a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use) for each home. Flood risk is covered in this report's 'Flood risk and drainage' section.

13. TRANSPORT

- 13.1 The site has excellent public transport links, with a Public Transport Accessibility Level of 6b, the highest score that can be achieved.

Cycle parking

- 13.2 Cycle parking for office staff will be provided at the ground floor level with step-free access in a dedicated storage area. The cycle store will be located adjacent to the waste store (details secured by condition 15).
- 13.3 The proposal would provide 70 stay-cycle parking spaces for office staff. This would consist of 56 two-tier racks, four standard Sheffield stands (8 spaces), two large Sheffield stands (2 spaces for adapted cycles), and two spaces with charging facilities for electric bikes.
- 13.4 The number of cycle parking spaces to be provided meets the minimum requirements of the London Plan, which is welcomed. The type of facilities to be provided are per CPG Transport and London Cycling Design Standards (LCDS) guidance.
- 13.5 Cycle parking facilities for visitors cannot be provided within the site boundary due to lack of space. Instead, 'Sheffield' stands (or similar) will be provided on-street by the Council or TfL. The London Plan cycle parking requirements for visitors equates to 10 spaces for the office space. The cycle parking stands would be installed in the vicinity of the site by the Council. An off-site cycle

parking contribution for this purpose would be secured as part of the highway's contribution via a Section 106 agreement.

- 13.6 The proposals also include changing facilities, showers, and lockers, which would help encourage staff to commute by bike.
- 13.7 Overall, the cycle parking proposals are deemed Policy T1 and London Plan Policy T5 compliant.

Car parking

- 13.8 Following London Plan Policy T6 and the Camden Local Plan, the development would be car-free as all car parking spaces currently at the site would be removed. A legal agreement would prevent future office occupiers from obtaining on-street parking permits.
- 13.9 At the basement level, the existing ramped car park access would be removed and replaced with office space, and end-of-trip cycle facilities would be in the basement accessed via stairs from the ground floor cycle stores. The end-of-journey facilities include showers, changing rooms, a drying room and locker space, and an accessible shower and WC.
- 13.10 Regarding disabled parking, London Plan Policy T6.5 'Non-residential disabled persons parking,' section A states: '*...all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.*' Paragraph 5.19 of the Camden Planning Guidance on Transport states: '*For all major developments, the Council will expect that disabled car parking is accommodated on-site.*' A potential location adjacent to the site on Whitfield Street has been identified. One accessible parking space would be provided on-street, and a contribution of £3,500 would be secured via a section 106 agreement.
- 13.11 The two existing Police parking bays on Whitfield Street would no longer be required and would need to be removed. A financial contribution to amend the existing traffic management order would be secured as part of the highway's contribution (total highways contribution is 25k) via the Section 106 agreement.

13.12 Trip generation

- 13.13 The proposals would create an additional 801 square metres of office floor space. This would lead to an increase in trips in the local area. The proposed development is expected to generate circa 266 additional daily trips. Most additional trips would be by public transport, with a considerable percentage (22.7%) to be made using active travel modes.

13.14 Pedestrian, cycling and environmental improvements

- 13.15 The proposed development will generate a modest increase in multi-modal trips to and from the site daily. The Council's transport policies are geared towards encouraging and promoting active travel (i.e., walking and cycling). The Council would therefore seek to secure a Pedestrian, Cycling and Environmental (PC&E) improvements contribution via a section 106 agreement. 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.
- 13.16 A pedestrian, cycling, and environmental improvements contribution of £88,000 would be secured towards the Fitzrovia Area Public Realm and Road Safety Improvements scheme via a section 106 agreement if planning permission is granted.
- 13.17 Travel planning
- 13.18 A travel plan and associated monitoring and measures contribution of £11,221 would be secured via a section 106 agreement. The Travel Plan would be targeted towards staff and visitors.
- 13.19 Construction management
- 13.20 The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. A CMP using the Council's CMP pro forma would therefore be secured via a section 106 agreement to ensure the impacts of construction could be mitigated.
- 13.21 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.
- 13.22 The development would require significant input from officers. This would relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during demolition and construction.
- 13.23 A CMP implementation support contribution of £10,116, and CMP Impact Bond of £16,000 would be secured via a section 106 agreement.
- 13.24 A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction is also recommended and would also be secured via a section 106 agreement if planning permission is granted.

13.25 Deliveries and servicing

13.26 Servicing activities would take place from the kerbside on Whitfield Street in the vicinity of the site. A Delivery and Servicing Plan (DSP) would be secured via a section 106 agreement. This would help to ensure that any operational impacts associated with delivery and servicing movements could be mitigated.

13.27 Highways works

13.28 The public highway adjacent to the site on Whitfield 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.

13.29 Various amendments to existing traffic management orders would be required. This includes the removal of 2 redundant Police parking bays and the provision of a disabled parking bay on Whitfield Street.

13.30 The Council would also need to install 'Sheffield' stands (or similar) on Whitfield Street adjacent to or near the site to provide for visitor cycle parking requirements.

13.31 The Council would need to repair any damage to the public highway on completion of the proposed development. A highways contribution of £25,000 would be secured via a section 106 agreement. The highway works would be implemented by the Council's or TfL's highways contractor on completion of the development. The highway works would include where necessary:

- Removal of a redundant vehicular crossover on Whitfield Street.
- Repaving the footway directly adjacent to the site on Whitfield Street (including where the redundant vehicular crossover is to be removed).
- Amendments to existing traffic management orders on Whitfield Street to (1) remove 2 redundant Police parking bays, (2) provide a disabled parking space.
- Provision of 5 Sheffield stands (or similar) to provide 10 short stay cycle parking spaces for visitors.
- Any other works the Council acting reasonably requires as a direct result of the Development.

13.32 Micromobility improvements

13.33 Parking bays for dockless rental e-bikes and rental e-scooters are located nearby. However, these merely provide capacity for existing usage by residents and people who work in or visit the area, and indeed many of those bays are already at, or over, capacity. Demand (trips) by dockless bike hire and e-scooter modes continues to rise rapidly in the Borough. The Council has ambitions to increase the current bay network across Camden from 200 now to around 280

by 2025, and further expansions beyond that to meet demand. Officers anticipate additional demand for more parking bays to be provided in this area. A cycle/e-scooter hire improvements contribution of £10,000 would therefore be secured via a section 106 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.

14. OPEN SPACE

- 14.1 The Local Plan requires an ‘appropriate contribution’ to open space, prioritising publicly accessible open space. The Local Plan seeks to secure sufficient open space with the capacity to meet the additional demand arising from new development (including a change of use). Policy A2 prioritises securing new public open space on-site, with the provision of space off-site near the development acceptable where on-site provision is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision to ensure additional demand arising from development is met.
- 14.2 CPG Public Open Space states that developments exceeding 1,000m² in the borough in floorspace are likely to increase the working population will be expected to contribute towards open space and play facilities. Policy A2 part m applies a standard of 0.74m² per occupant for commercial developments.
- 14.3 The police divisional headquarter offices are over first to third-floor levels and are accessed from the public highway via an entrance. Therefore, from the first to the third floor, the use is very similar to a conventional Class E office space. The total proposed GIA of the ground floor and basement is 1077 sqm meaning the total uplift which would increase the working population is 1,878 sqm. This is the area which is factored into the open space contribution. Maintenance costs are at £7 per sqm open space over 10 years which is effectively £70 per sqm open space. The contribution is calculated as:

Maintenance

$$0.74 \times (1878/12) = 115.81$$

$$115.81 \times £70 = £8,106.70$$

Capital costs

$$0.74 \times (1878/12) = 115.81$$

$$115.81 \times £200 = 23,162$$

Full amount £31,269

14.4 This contribution is expected to fund the Council's investment programme in Crabtree Fields.

15. COMMUNITY INFRASTRUCTURE LEVY (CIL)

15.1 The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule.

15.2 In London, CIL is charged at both a regional level, by the Mayor, as well as at a local level, by London Borough of Camden. In terms of Mayoral CIL, the revised Charging Schedule referred to as MCIL2 is now used and given that this Site is within the Band 1 and Central London charging zones, it is payable at the following rates:

- Offices - £185 per sqm GIA (plus indexation)

15.3 Camden adopted its revised CIL charging schedule on 30 October 2020. This Site is within Zone A (Central), where development is charged at the following rates:

- Office – £110 per sqm GIA (plus indexation).

15.4 There is a net liable area of 801 sqm with demolition of 224 sqm applied to the draft CIL calculation resulting in a draft calculation of £253,060.

16. CONCLUSION

16.1 The proposal delivers the sustainable reuse of a vacant building in Central London. The operational police staff have left and moved to Albany House, Broadway, SW1. There would be no policy requirement to provide a replacement community use.

16.2 The change of use and extensions provide an uplift of approximately 6,319 sqm (801 sqm sqm from extensions) of Office (Class E) floorspace. The uplift in office space is welcomed and complies with Policy E1 of the Local Plan as it would secure the provision of employment.

16.3 The scheme provides 20% of the former police station area at the ground and basement as Affordable Workspace (AW). This is based on these floors being the only area where the site is being intensified as the upper floors are essentially akin to office use. The 225 sqm area at ground and basement levels would be allocated as AW at 50% of the open market rent and provided for 15 years.

- 16.4 The new elevations on Tottenham Court Road and Whitfield Street are of higher architectural quality than the existing ones. The increase in height on both principal elevations would not be harmful to the Charlotte Street Conservation Area or listed buildings nearby. The ground floor alterations would activate the Whittington Street which currently has a 'back-of-House' character. The extensions and alterations to fenestration on the northern and southern elevations are acceptable in terms of design. The terraces and rooftop plant enclosure have been designed to have minimal visibility from street level. The development would enhance the character and appearance of the Charlotte Street Conservation Area and Bloomsbury Conservation Area.
- 16.5 The extensions would have some noticeable impacts on surrounding daylight and VSC. There would be noticeable impacts to 53-54 Tottenham Court Road, a floor plan available on the planning register, does not denote the room uses in this property. However, it is assumed that the main habitable spaces of the apartments likely face over Tottenham Court Road and therefore the impacts will likely be to secondary rooms such as bedrooms which face Kirkman Place. In summary, the worst affected windows are the ones facing the alleyway and likely to be bedrooms which is acceptable on balance.
- 16.6 For other properties, when considering the presence of existing balconies and the fact that the site is located within a dense urban area it has been concluded that the impacts are acceptable and clearly outweighed by the benefits of the scheme.
- 16.7 The scheme provides green roofs and PV panels which improves the buildings energy and sustainability credentials. The scheme was revised so that the entire roof maximises PV panels to comply with the Local Plan target of 20% reduction in carbon dioxide emissions from on-site renewable energy generation (secured by condition 12).
- 16.8 The development is car free and would promote sustainable means of travel such as cycling (70 long stay and 10 short stay cycle spaces in total secured by condition 5) and walking.
- 16.9 The proposed development is in general accordance with policies of the development plan and the National Planning Policy Framework (2023).

Public benefits

- 16.10 No harm has been identified to heritage assets in accordance with the NPPF test under paragraph 202, but if the committee when assessing the impacts of this scheme considers that there is harm, there are public benefits that would weigh against that harm.
- The provision of high-quality, office floorspace which would support job creation in the Central London Area and Central Activities Zone

- Inclusion of 255 sqm GIA affordable workspace;
- The delivery of a higher-quality building in terms of design;
- Improved public realm as part of pavement widening on Whitfield Street;
- Green roof and on-site energy generation; and
- The provision of significant Community Infrastructure Levy contributions and financial contributions to be secured through a Section 106 agreement.

17. RECOMMENDATION

17.1 Grant conditional Planning Permission subject to a Section 106 Legal Agreement with the following heads of terms:

PiL for on-site housing

- Payment in lieu of residential delivery of £600,750.

Employment and training

- 255 sqm GIA of affordable workspace at a 50% discount for a 15-year period;
- Affordable Workspace Specification and Management Plan (including consultation with the council to locate a tenant);
- Employment and Training Plan.
- End use work placements to be agreed (at least 2)
- five construction work placements
- Sign up to the Camden Local Procurement Code - target of **10%** of the total value of the construction contract.
- 6 construction apprentices paid at least London Living Wage
- 20% local Recruitment Consultation/work with the Kings Cross Construction Skills Centre to recruit to vacancies,

Open space and mural relocation plan

- Open space contribution £31,269
- Mural relocation plan;

Transport

- Levels plan.
- Construction management plan (CMP)
- CMP implementation support contribution of £10,116
- CMP Impact Bond of £16,000
- Car free
- Disabled parking bay contribution of £3,500
- Pedestrian, Cycling and Environmental Improvements contribution £88,000.
- Micromobility improvements contribution of £10,000

- Travel Plan and Travel Plan Monitoring Contribution of £11,221;
- Highways Contribution (including cycle stand contribution) £25,000

Sustainability

- BREEM Excellent compliance and post construction review, targets as states in the energy and sustainability statements for Energy, Materials and Water
- Energy provisions to be secured through Energy Efficiency & Renewable Energy Plan

18. LEGAL COMMENTS

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

19. CONDITIONS

Condition(s) and Reason(s):

Condition(s) and Reason(s):

- 1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans and supporting documents:

Existing drawings

430(EX)099 PL1; 430(EX)100 PL1; 430(EX)101 PL1; 430(EX)102 PL1;
430(EX)103 PL1; 430(EX)104 PL1; 430(EX)200 PL1; 430(EX)201 PL1;
430(EX)202 PL1; 430(EX)203 PL1; 430(EX)300 PL1; 430(EX)301 PL1;
430(EX)302 PL1; 430(EX)303 PL1

Demolition drawings

430(DE)099 PL1; 430(DE)100 PL1; 430(DE)101 PL1; 430(DE)102 PL1;
430(DE)103 PL1; 430(DE)104 PL1; 430(DE)200 PL1; 430(DE)201 PL1;
430(DE)202 PL1; 430(DE)203 PL1

Proposed drawings

430(GA)099 PL1; 430(GA)100 PL1; 430(GA)101 PL1; 430(GA)102 PL1;
430(GA)103 PL1; 430(GA)104 PL1; 430(GA)105 PL3; 430(GA)200 PL1;
430(GA)201 PL1; 430(GA)202 PL1 ; 430(GA)203 PL1; 430(GA)204;
430(GA)300 PL1; 430(GA)301 PL1; 430(GA)302 PL1; 430(GA)304 PL2;
430(ExDT)200 PL1; 430(ExDT)201 PL1; 430(ExDT)202 PL1

Planning Statement; prepared by Gerald Eve LLP; Design and Access Statement (including servicing), prepared by Halebrown Architects; Townscape, Heritage and Visual Impact Assessment, prepared by JL Heritage and included within the Design and Access Statement; Daylight and Sunlight Assessment, prepared by GIA; Energy and Sustainability Statement (including BREEAM pre-assessment), prepared by TPS; Financial Viability Assessment, prepared by Gerald Eve LLP; Noise Impact Assessment, prepared by Venta Acoustics; and Statement of Community Involvement, prepared by Kanda.

Reason: For the avoidance of doubt and in the interest of proper planning.

- 3 All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the London Borough of Camden Local Plan 2017.

- 4 Before the brickwork is commenced, a sample panel of the bay on each principal elevation demonstrating the window reveal, proposed colour, texture, face-bond and pointing shall be provided on site and approved in writing by the local planning authority. 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.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

- 5 The basement cycle storage area for 70 long stay cycles shown on the basement floorplan hereby approved shall be provided in its entirety prior to the first occupation of any part of the offices, and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.

- 6 The terraces hereby approved on the Whitfield Street elevation at first, second, third and fourth floors shall only be accessed from 9am to 8pm, Mondays to Fridays. The terrace on the north elevation at first floor shall only be accessed from 9am to 7pm, Mondays to Fridays. The terrace on the Kirland Place elevation at third and fourth floor levels shall only be accessed from 9am to 8pm Mondays to Fridays. No music shall be played on the terraces.

Reason: In order to safeguard surrounding residents from noise and disturbance in accordance with Camden Local Plan Policy A1 and A4.

- 7 Noise levels at a point 1 metre external to sensitive facades shall be at least 10dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 15dB(A) below the LA90, expressed in dB(A).

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

- 8 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.

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

- 9 Air Source Heat Pump

Prior to installation of new plant equipment, details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or COP of 4 or more or SCOP of 3.4 or more) 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 details approved by the Local Planning Authority and permanently retained and maintained thereafter.

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 Policies

- 10 The development hereby approved shall achieve a maximum internal water use of 110litres/person/day. The dwelling/s shall not be occupied until the Building Regulation optional requirement has been complied with.

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, CC3 of the London Borough of Camden Local Plan 2017.

- 11 Prior to commencement of the relevant part of development, full details in respect of the living roof in the area indicated on the approved roof plan shall be submitted to and approved by the local planning authority. The details shall include

- I. detailed scheme of maintenance
- II. sections at a scale of 1:20 with manufacturers details demonstrating the construction and materials used
- III. full details of planting species and density

The living roofs shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies G1, CC1, CC2, CC3, D1, D2 and A3 of the London Borough of Camden Local Plan 2017.

- 12 Prior to the relevant works taking place on site, detailed plans showing the location and extent of photovoltaic cells 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 (to achieve targeted Be Green carbon reductions). The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

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.

- 13 Reuse and recycling of demolition waste

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.

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.

- 14 Before the development commences, details of the location, design and method of waste storage and removal including recycled materials, shall be submitted to and approved by the local planning authority in writing. The facility as approved shall be provided prior to the first occupation of any of the new units and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1 and A4 of the London Borough of Camden Local Plan 2017.

20. INFORMATIVES

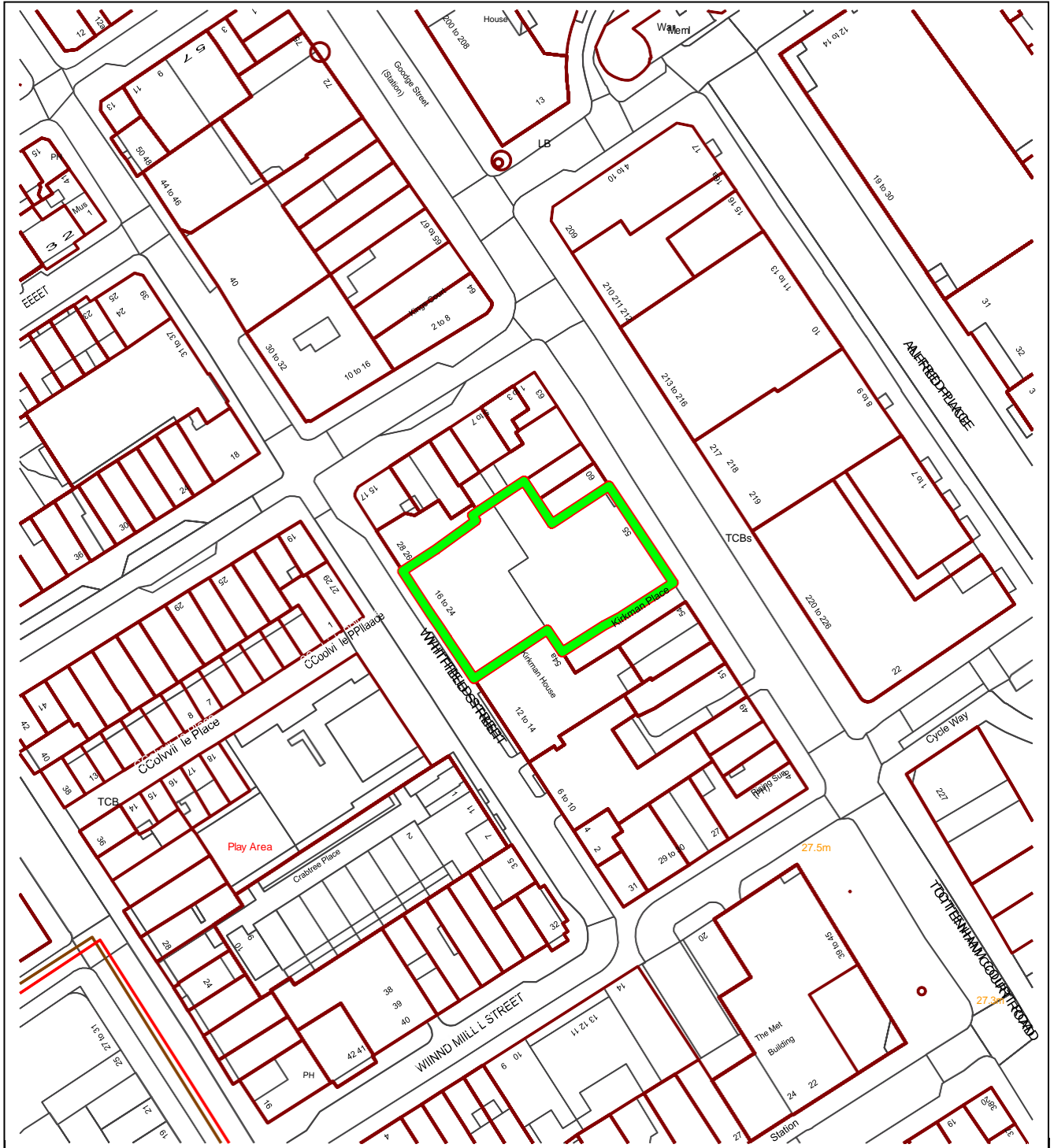
1. Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020 7974 6941).
2. This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square Camden Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
3. Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is

granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.

4. All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)

Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.

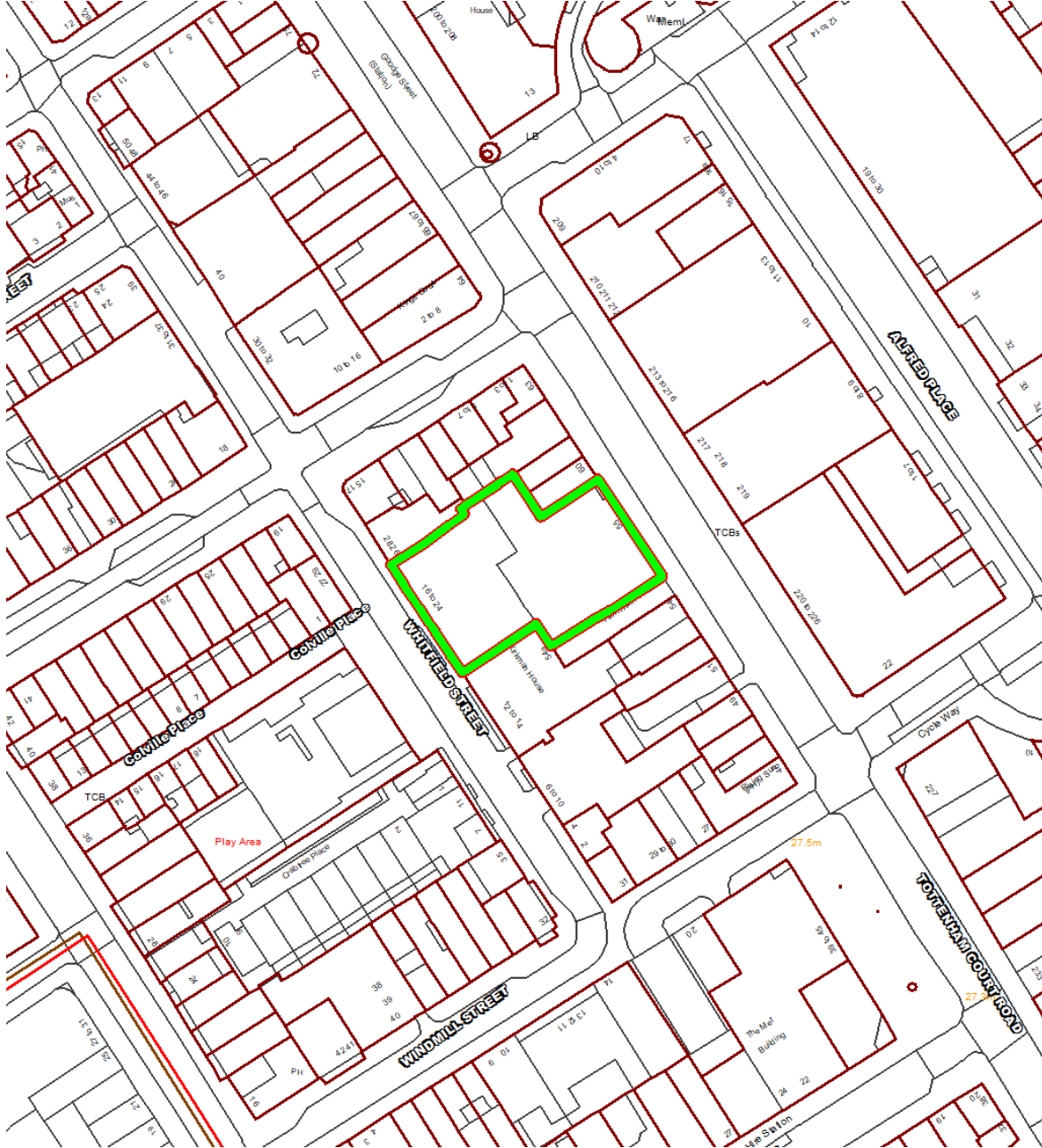
Central London Police Station 16 - 24 Whitfield Street 2023/3808/P



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2023/3808/P

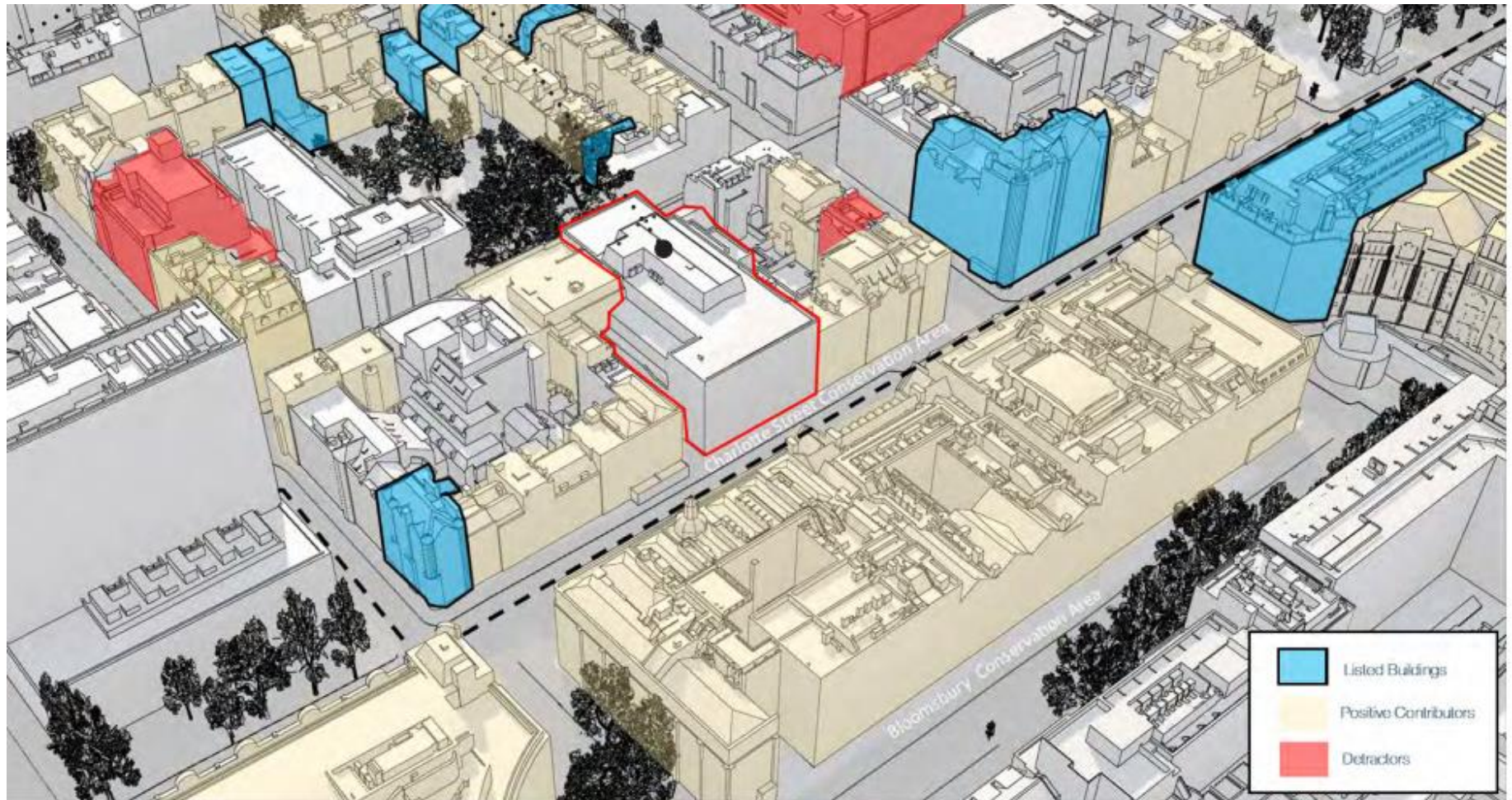
Central London Police Station
16 - 24 Whitfield Street
London
W1T 2RA

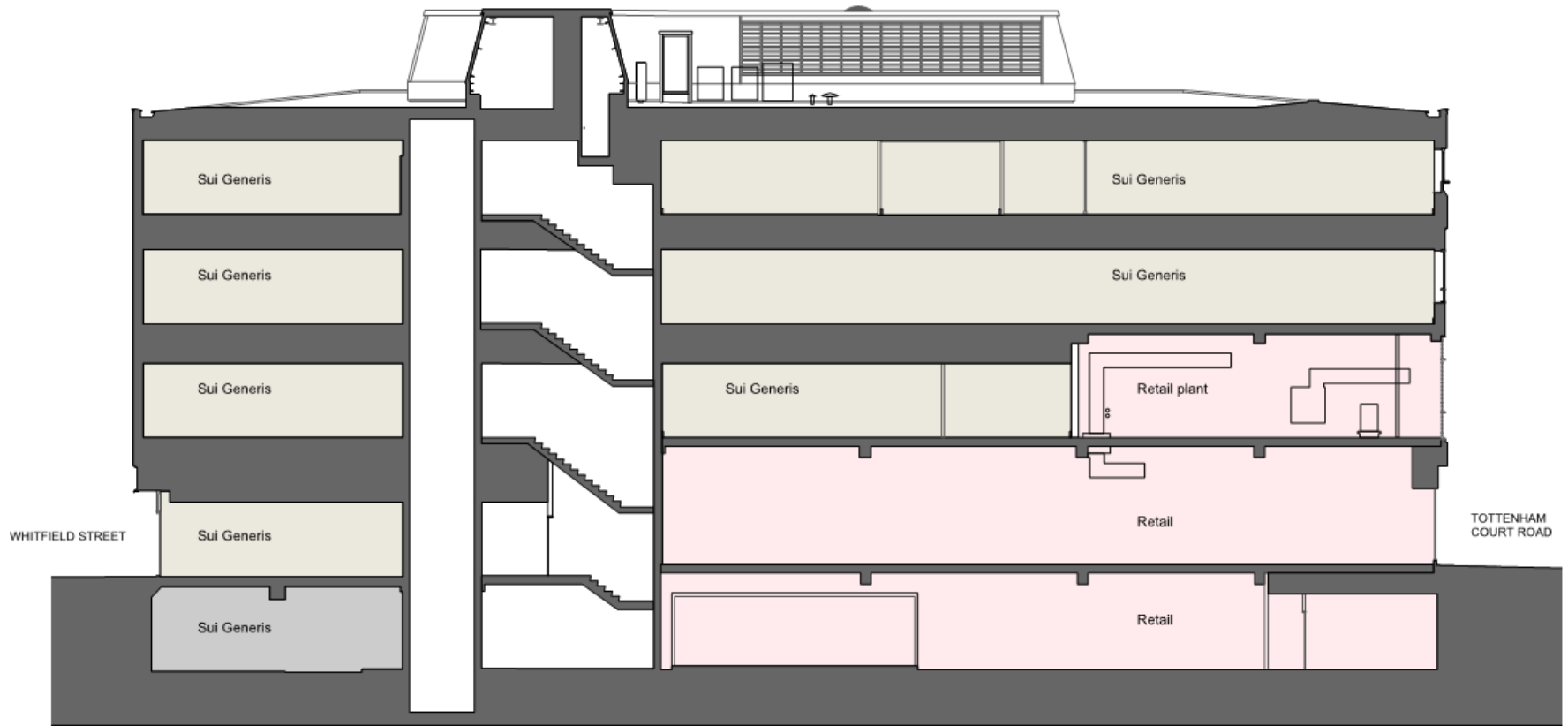




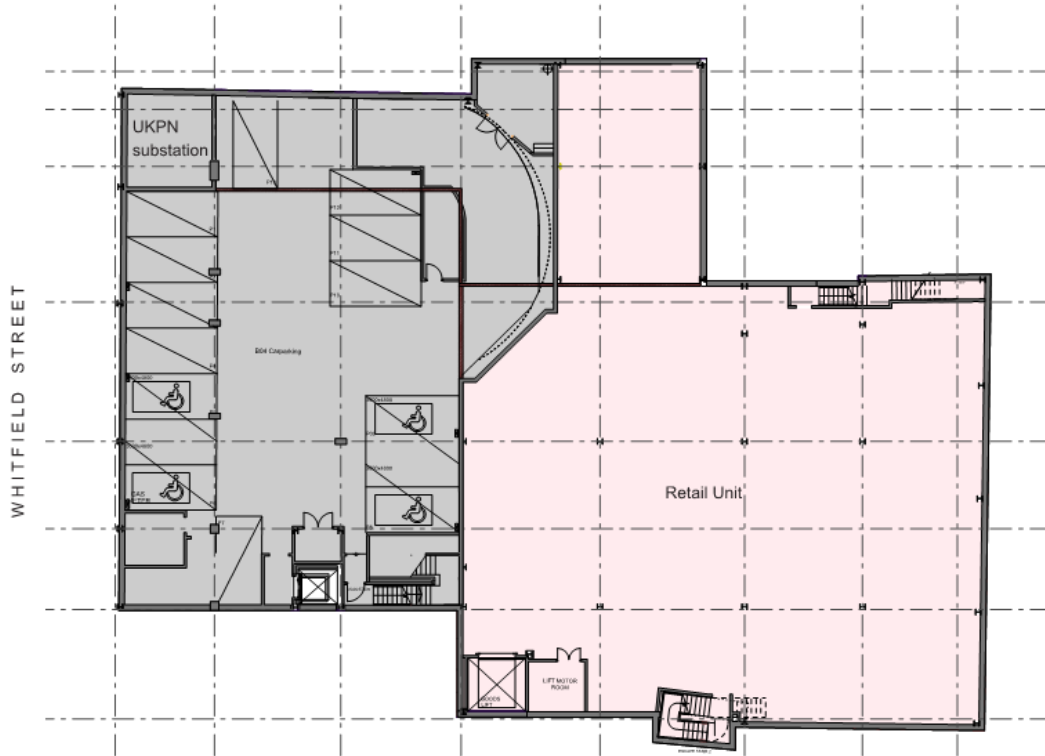






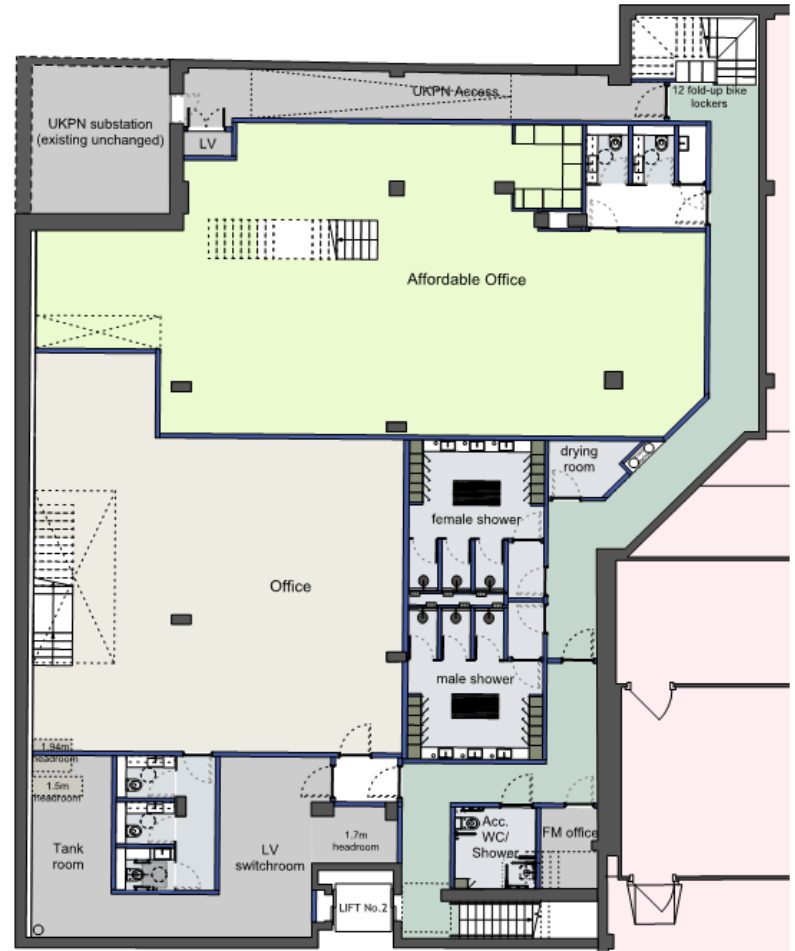


Section AA

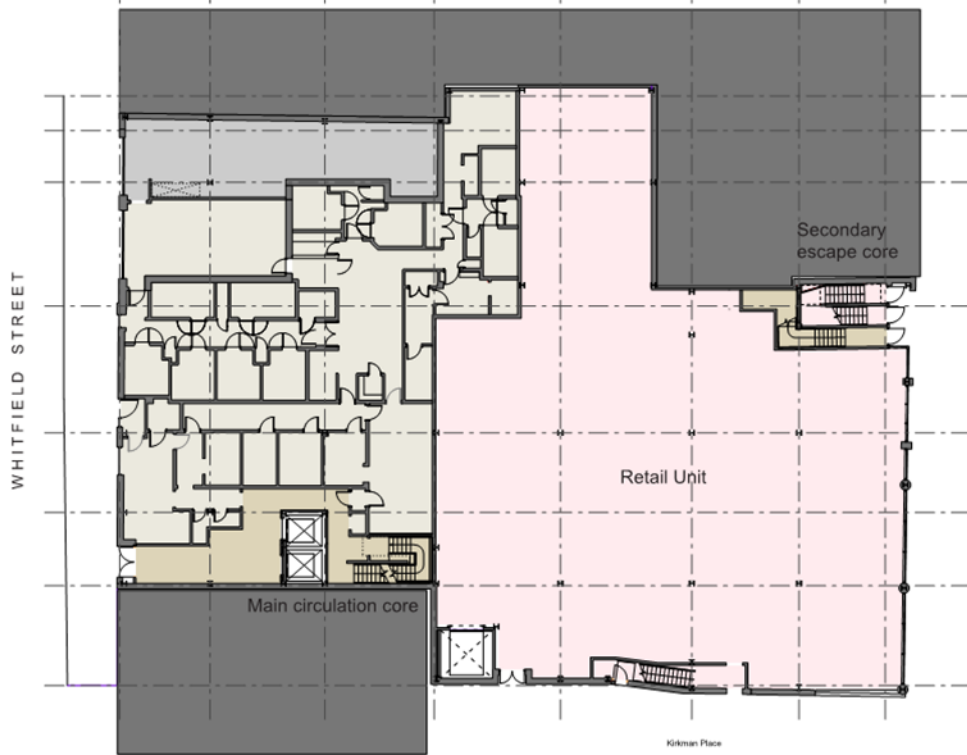


Existing Basement Floor plan

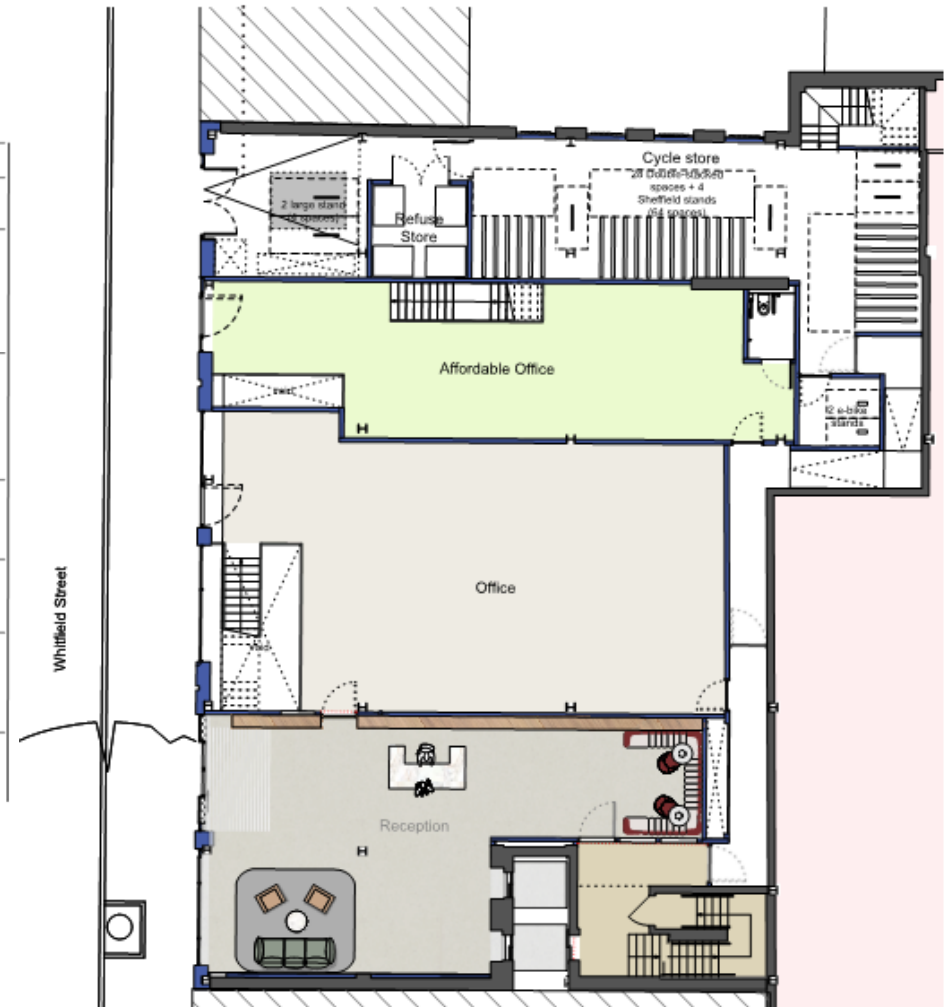
- Retail (Storage and Back-of House)
- Car Park and Plant



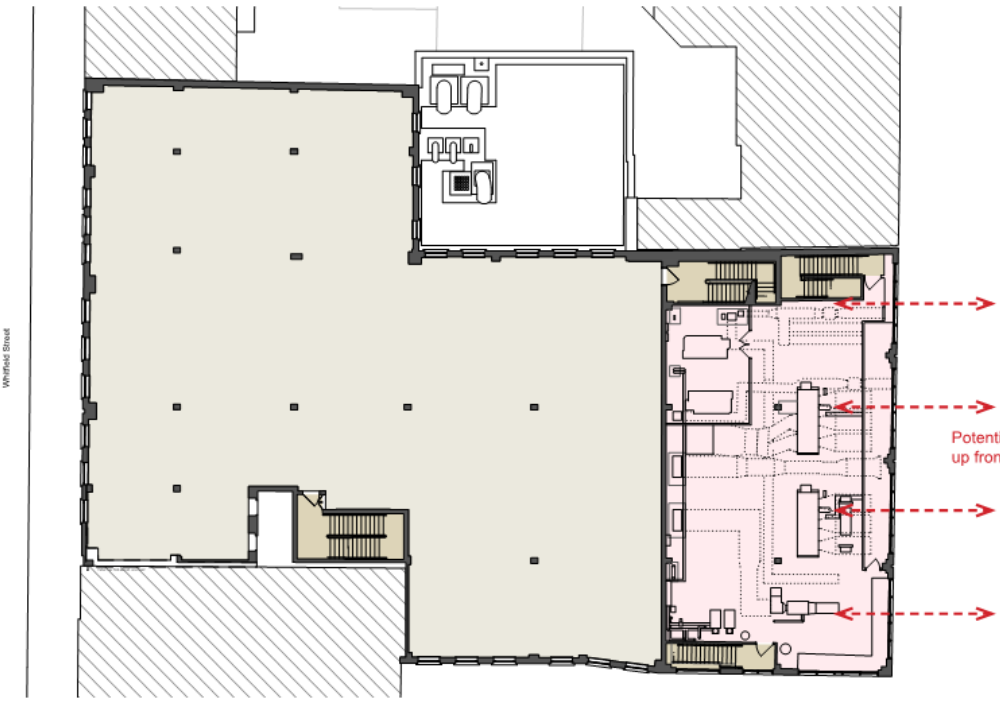
Proposed ground floor plan



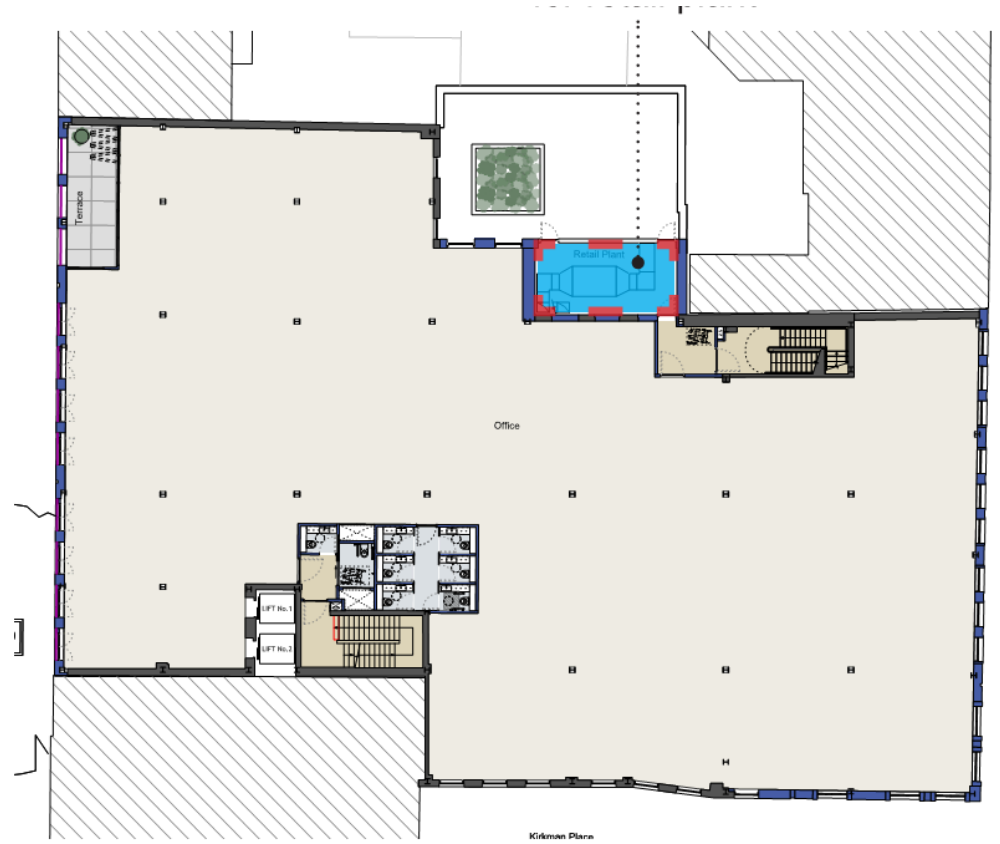
Existing Ground Floor plan



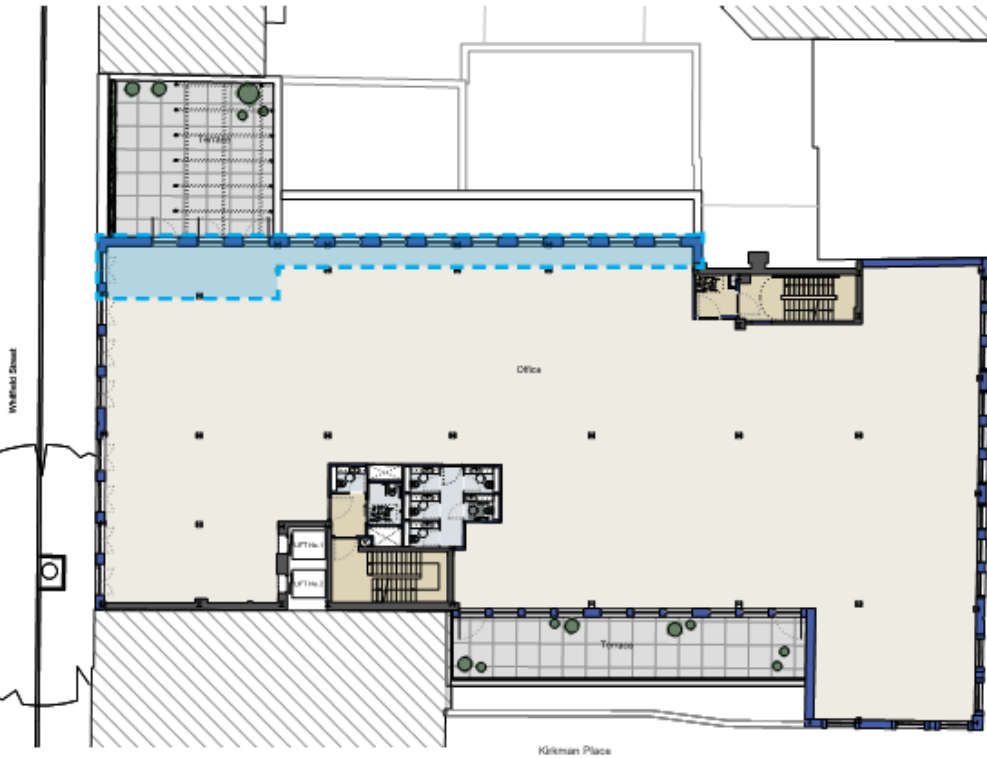
Proposed Ground Floor



Existing 1st floor plan



First Floor Plan - Location of retail plant

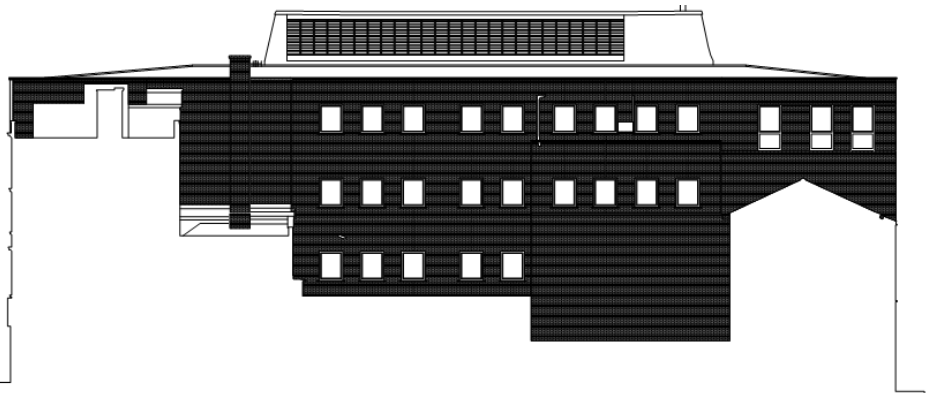


Proposed Third Floor plan

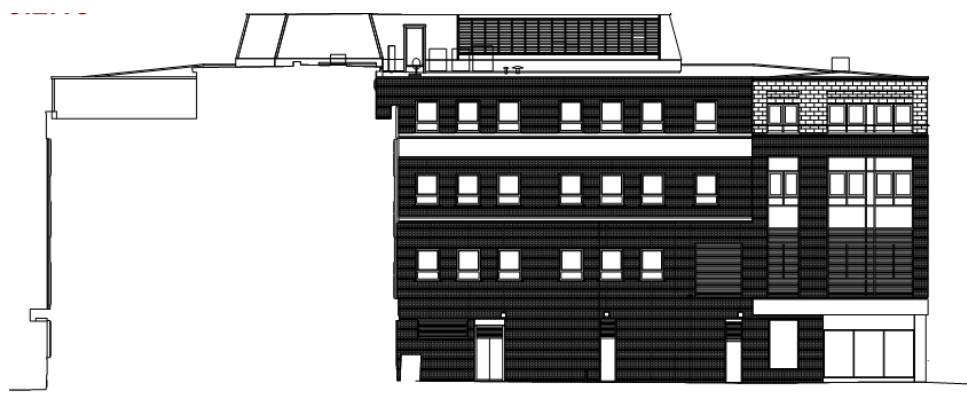




Proposed Second Floor plan



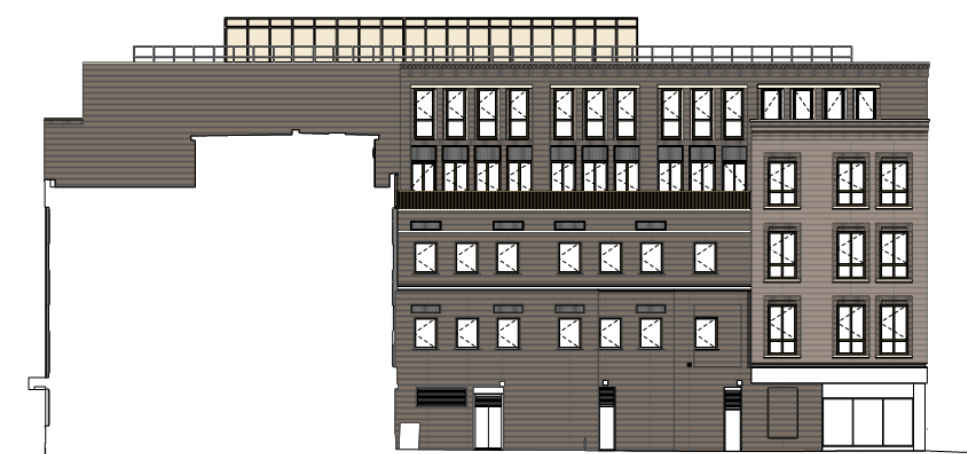
Existing North Elevation



Existing South Elevation



Proposed North Elevation



Proposed South Elevation



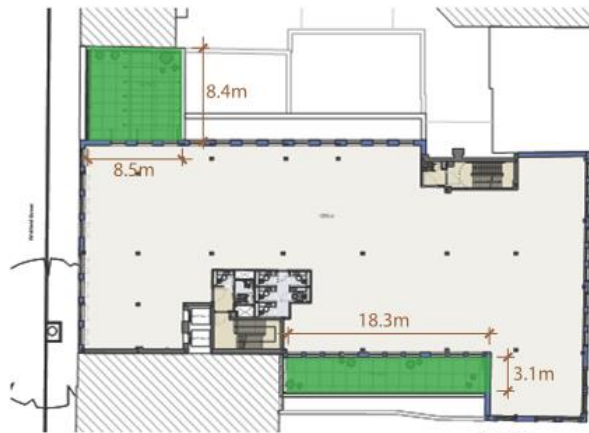
First Floor

Terrace: 18 sqm



Second Floor

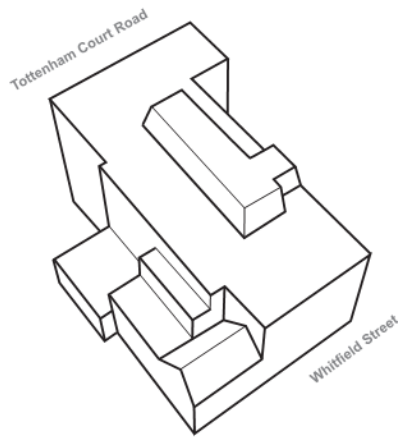
Terrace: 69 sqm



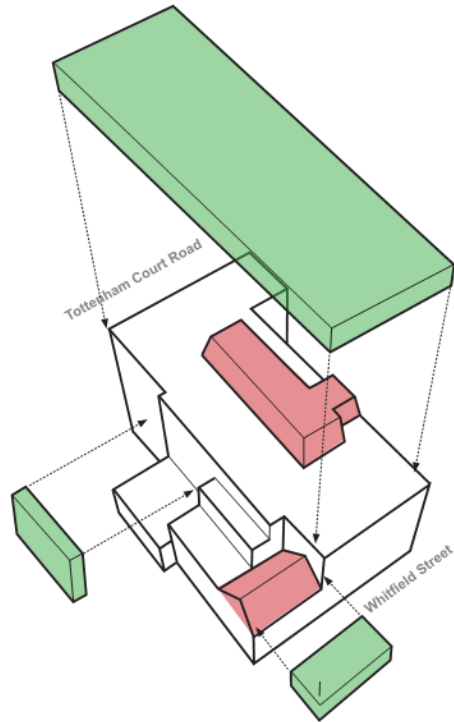
Terrace: 127 sqm



Terrace: 78 sqm

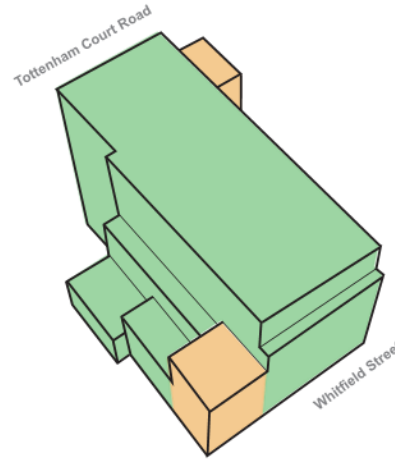


Existing Building



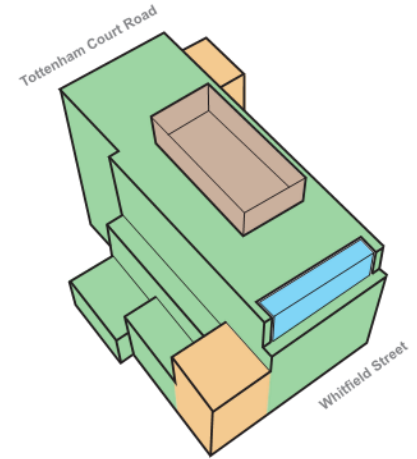
Removing existing roof plant + lower level pitched roof

- Demolition
- New extensions



Symmetrical treatment to massing and elevation design to Tottenham Court Road and Whitfield Street

- Massing 1
- Massing 2



Inserting top floor pavilion and adding new roof plant

- New 'pavilion'
- New set-back plant enclosure

- The design proposals aim to rationalise the overall massing of the existing building in comparison to the consented scheme to create more unified volumes, rather than just adding new facades to the existing volumes
- The following pages set out the main moves floor-by-floor in comparison to the consented scheme



Proposed Tottenham Court Road elevation



Material palette



Same brick with different colour mortar



Stone lintels



PPC metal framed glazing



Feature masonry details at coping



Soldier stack brick bonding at coping



Stone surround to windows



Proposed Whitfield Street View

Material palette



Wet-cast stone lintel to match brickwork



Wet-cast stone fins and spandrel to pavilion



PPC metal framed glazing



Feature masonry details at coping



Soldier stack brick bonding at coping



Metal grill and framed glazing









Consented streetscape



Proposed streetscape





