



Ms Amanda Peck
Development Control Planning Services
London Borough of Camden
Town Hall
Argyle Street
London WC1H 8ND

94 12 14

31 May 2013

Dear Ms Peck,

**CENTRE POINT TOWER, CENTRE POINT LINK and CENTRE POINT HOUSE
101-103 NEW OXFORD STREET and 5-24 ST GILES HIGH STREET, LONDON WC1A 1DD
PLANNING APPLICATION REFS: 2013/1957/P, 2013/1961/L, 2013/1970/P and 2013/2000/L**

Thank you for consulting the Twentieth Century Society on these listed building consent and planning applications at the above site for ground floor extension, façade replacement, other alterations. The applications include the change of use of the tower from office B1 use to C3 residential use and various other changes of use from B1 office to A1/A3/A4 flexible retail/restaurant/bar use. An additional element not included in the previous applications is the redevelopment of the Intrepid Fox site for an 11 storey development to contain two alternative schemes of 16 or 13 units.

As you are aware, we have attended pre-application meetings with Rick Mather Architects and building owners Almacantar regarding this revised scheme, since the previous proposals were refused at planning committee in September 2012. The reasons for refusal of listed building consent were:

- 1. The proposed glazing under the link bridge, by virtue of the infilling of the space would alter its appearance as a bridge and alter the composition of Centre Point as a whole, thus harming the special interest of the listed building.*
- 2. The proposed alterations to the building's facade, results in the loss of original fabric and alters the appearance of the building, thereby harming the architectural and historic interest of the building.*

The glazing under the link bridge referred to in reason 1 has been excluded from the submitted applications. The revised application submission has been reviewed by our advisory casework committee, and this letter constitutes the views of the committee.

Significance

Located at the intersection of Charing Cross Road, New Oxford Street and Tottenham Court Road, Centre Point is one of London's most distinctive landmarks. The site comprises Centre Point Tower, Centre Point House, the connecting link bridge and the fourth element of the ensemble, Intrepid Fox pub site. The site is located within the Denmark Street Conservation Area, with Bloomsbury Conservation Area lying immediately adjacent to the site to the north of New Oxford Street. The site is grade II listed, and identified as a designated heritage asset under the National Planning Policy Framework (NPPF).

Centre Point's bravado and high level of detailing makes it one of the finest of the tower blocks built to the designs of Richard Seifert and George Marsh in the 1960s. It is widely recognised as the one of the finest most important speculative office building of its time, and was added to the statutory list in 1995 for its architectural interest and innovation. Not only is the tower itself of interest, but also its relationship with the link and rear block, each element individually expressed to identify its function. It is also the only listed building by this highly influential firm.

Centre Point was both technically and architecturally pioneering; it was the first tall building in England to use precast concrete components and also the first not to require scaffolding. Centre Point is also important for initiating the shift away from the plain glass curtain wall trend, which dominated the commercial tower block sector. Centre Point's flamboyant sculptural architectural treatment can be accredited for significantly contributing to a more imaginative language in corporate architecture.

Policy context

Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to its conservation. It adds that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional.

Paragraph 133 states that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and

- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

Denmark Street Conservation Area

The site lies within a Conservation Area, and as such the proposals should be viewed in terms of their impact not only on the listed building, but also the character of the conservation area - which is a designated heritage asset. The Denmark Street Conservation Area Appraisal and Management Strategy states:

“The conservation area hosts a variety of built forms. New designs should respect the scale and layout of the particular location, and complement the appearance, character and setting of the existing buildings and structures, historic street pattern, areas of open space, and the environment as a whole” (para 6.1).

The Proposals

In terms of a comparison between the refused scheme and the submitted schemes, aside from the public realm element, the major difference between the two is the proposed redevelopment of the Intrepid Fox site. This and other points are addressed below:

Intrepid Fox site

The Twentieth Century Society considers that despite the later ground floor extension, the Intrepid Fox building is of architectural significance. The podium arrangement which accommodates Centre Point House is extruded out from the slab block- typical of Corbusian style design of the 1950s and 60s. The two storey element is separated from the curtain walling of the residential element, and terminates the Centre Point site neatly at first floor level with set-back timber framed windows at the approach from St Giles High Street, and respects the scale of St Giles Church (grade I listed) opposite. While there is clearly scope for alteration at ground floor level, the massing of the two storey element is crucial for providing key views of the Centre Point site on the approach from St Giles High Street.

The demolition of the whole pub building and the new eleven storey (including basement) building will introduce a new bulky mass which would be higher than Centre Point House and be read as a crude extension to this part of the grade II listed complex. The 11 storey extension is out of character with the rest of the buildings and is bulky and over-scaled. It would also cause significant visual harm by blocking views of glazed stairwells which articulate and add interest to the flank wall of Centre Point House.

In policy terms, we consider the 11 storey extension to cause substantial harm to the grade II listed complex of buildings. In addition, the proposed 11 storey building would also cause substantial harm to the character of the conservation area, and thus a designated heritage asset in its own right. Such harm under the terms of para 132 should be exceptional, and should be clearly and convincingly justified. We do not believe the loss of the pub and its replacement meet this criteria. Nor do we consider that the proposals meet the policy criteria set out in paragraph 133. We do not consider that this element of the scheme would deliver substantial public benefits that outweigh the harm to the designated heritage assets.

Centre Point House facades

Members of our advisory casework committee noted with regret that the proposed replacement of the façades of Centre Point House would result in the loss of almost the entire existing historic 1960s curtain walling, and would result in substantial harm to the designated heritage asset. The committee appreciated the requirement for better thermal performance from the building facades, but it was felt that the proposed replacement did not appear to respond to the style, character, and colour of the original. It felt that a more conservation orientated approach might suggest other solutions and that to date insufficient justification had been submitted to support this level of intervention and loss of historic fabric.

As submitted, the proposals do not differ from those submitted in the previous, refused application. As such we maintain our objection to this aspect of the proposals, and we consider the previous reason for refusal (No. 2) is still relevant in this case.

Projecting Stair and external bench

These proposals have not changed since the last application, and as such our view on this element remains the same. The Society views the external cantilevered staircases as expressive and sculptural features that are an essential and dramatic part of the building. We strongly object to their removal and relocation within the building. We understand that the front stair is already compromised by the Crossrail proposals and thus it is of added importance that the rear stair is maintained in its current original position. The associated external bench forms part of the sculptural composition of the tower, along with the stair and should remain in-situ as public seating.

Other details

Through meetings with the architects and applicant, we have resolved other minor issues such as the detailing of the brise-soleil and the spandrel panels of the Centre Point Tower facades. Members felt comfortable with the level of further justification provided by the applicants to justify these alterations.

Conclusion

Overall, we consider the loss of the Intrepid Fox pub and the replacement 11 storey tower would result substantial harm to this complex of listed buildings, as well as the Denmark Street Conservation Area. We also object to the large-scale loss of historic fabric on Centre Point House, and we do not consider the previous reason for refusal has been adequately addressed in this revised application. We also maintain our objection to the relocation of the external stairs, which are expressive and sculptural features of the building and plan form. As such, the Twentieth Century Society strongly objects to the proposals.

I trust these comments are helpful to you in your determination of this application. I would be very grateful if you could keep us informed of the outcome of this case. Should you have any queries, please do not hesitate to contact me at this office.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Henrietta Billings'.

Henrietta Billings

Senior Conservation Adviser

The Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.