

CONSOLIDATED DEVELOPMENTS LTD

ST GILES CIRCUS

PLANNING STATEMENT

DECEMBER 2012

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Executive Summary

1. The core of the site occupies an irregular quadrilateral of land boarded by Denmark Street, Charing Cross Road, Andrew Borde Street and St Giles High Street. Denmark Place, a pedestrian alley, cuts across the site from east to west dividing the site into two parts. This area is noted by the emerging LDF Site Allocations Document to represent the major development opportunity in the area and notes that its redevelopment will be crucial to the success of the wider area 'In the creation of edges to streets and spaces and the quality of the design solution in response to the character and appearance of the area as a whole.'(p.74)
2. To facilitate the construction of the Tottenham Court Road Crossrail station and the upgrade of the existing LUL station the northern portion of the application site has been temporarily taken over by Crossrail and the majority of buildings to the north of Denmark Place have been demolished.
3. The application site falls within the Tottenham Court Road Opportunity Area, which identifies and promotes the site and surrounding area as being capable of accommodating substantial development to provide new jobs or homes. The London Plan notes that these areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density, both of which apply to the application site.
4. The position of the main development site is particularly complex as it addresses a diverse range of conditions, ranging from the historic buildings on Denmark Street to the new station entrances and planned spaces to the north of Andrew Borde Street, as well as the setting of Centre Point and the scale and building line of the historic St Giles High Street. On the western edge the site must address the more commercial frontage of Charing Cross Road as well as the new developments proposed beyond, resulting in a wide range of complexities and sensitivities to be considered.
5. The proposals include the provision of two new primary street buildings on St Giles High Street, Andrew Borde Street and Charing Cross Road, plus a smaller building on Denmark Place to provide a mix of retail, hotel and restaurant/bar use as appropriate to this Central London location. Tapping into the music heritage of the area the proposals include a flexible basement Event Gallery which will be accessed via Denmark Place. In addition to the built environment the proposals incorporate new pedestrian routes through the site, encouraging people away from the exit of Tottenham Court Road and ensuring appropriate dispersal through the local area.

6. Central to the development proposals is the new Urban Gallery which will provide publically accessible space to help accommodate the predicted increase in footfall following the completion of Crossrail. The Urban Gallery will be a carefully curated space, providing a variety mix of uses within a carefully managed digital environment.
7. The development will provide an additional 1834 sqm (GIA) of residential floorspace of which 934 sqm (51%) will be provided as affordable. It is proposed to provide the affordable housing both within Denmark Street and on a standalone site at 71 Endell Street, which represents an exceptional opportunity for a high quality affordable housing development benefitting from private courtyard space within this Central London ward.
8. In this context it is considered that the development will make a not able contribution to both Camden and to London as a whole by resolving the dysfunctional lack of connectivity between Bloomsbury, Covent Garden and Soho through the creation of a place of character with improved movement and connections between people and places, whilst providing an urban environment which is distinctive, safe and of a human scale (Denmark Place Planning Brief 2004).

1. Introduction

- 1.1 This statement has been prepared on behalf of Consolidated Developments Ltd (hereafter referred to as 'the Applicant') in support of a series of linked planning applications for the provision of new buildings on the land currently in use as the Crossrail construction site at St Giles Circus, the refurbishment and conversion of a number of existing buildings to the north and south of Denmark Street and a nearby site at 71 Endell Street.
- 1.2 The proposals (hereafter referred to as 'the development') have evolved to build on the developer's track record of supporting music and local retailers with significant improvements to both the shops and public realm, ensuring that this area continues to be at the heart of the British music scene. Denmark Place, which is currently an unattractive and underused back alley, will be re-invigorated to tap into this music heritage and help ensure the on-going vitality of this specialist retail area.
- 1.3 The proposals include the provision of two new primary street buildings on St Giles High Street, Andrew Borde Street and Charing Cross Road, plus a smaller building on Denmark Place to provide a mix of retail, hotel and restaurant/bar use as appropriate to this Central London location. Tapping into the music heritage of the area the proposals include a flexible basement Event Gallery which will be accessed via Denmark Place. In addition to the built environment the proposals incorporate new pedestrian routes through the site, encouraging people away from the exit of Tottenham Court Road and ensuring appropriate dispersal through the local area.
- 1.4 Central to the development proposals is the new Urban Gallery which will provide publically accessible space to help accommodate the predicted increase in footfall following the completion of Crossrail. The Urban Gallery will be a carefully curated space, providing a variety mix of uses within a carefully managed digital environment.
- 1.5 The development will provide an additional 1834 sqm (GIA) of residential floorspace of which 934 sqm (51%) will be provided as affordable. It is proposed to provide the affordable housing both within Denmark Street and on a standalone site at 71 Endell Street, which represents an exceptional opportunity for a high quality affordable housing development within this Central London ward.

Public Consultation and Pre-Application Advice

- 1.6 A significant amount of pre-application consultation has been undertaken with both the Local Planning Authority (LPA) and local stakeholders – in particular the Denmark Street Traders Association - to guide the evolution of the proposals and wider public consultation activity has been on-going throughout the development of the scheme. Public Consultation activity and feedback responses are comprehensively set out in the Statement of Community Involvement, which accompanies this application.

Scope of the Application

- 1.7 It is proposed to submit an overarching Planning and Conservation Area Consent application for the main development, with an associated application for residential development at 71 Endell Street. Eight separate Listed Building Consents for works of repair and refurbishment to 6, 7, 9, 10, 20, 26 and 27 Denmark Street and 59 St Giles High Street are submitted alongside. A separate Advertisement Consent Application is also submitted for the digital displays proposed for the internal surfaces of the Urban Gallery.

- 1.8 The main planning application seeks consent for the following:

Erection of three buildings (5 storey and 7 storey facing Centre Point Tower and 4 storey to Denmark Place), following demolition of 1-6 Denmark Place, 18-21 Denmark Place and demolition of York and Clifton Mansions behind a retained façade, to provide 2955 sqm GIA of basement Event Gallery space to be used for community events, exhibitions, product launches, live music, awards ceremonies, conference and fashion shows (sui generis); a 723 sqm GIA urban gallery with 1912 sqm of internal LED screens, to be used for circulation space, retail, advertising, exhibitions, brand and product launches, corporate events, screenings, exhibitions and events (sui generis); 420 sqm GIA of flexible A1/A3 floorspace; 2995 sqm GIA A3 floorspace; 1066 sqm GIA of A4 floorspace; and a 28 bedroom hotel between Denmark Place and Andrew Borde Street. Refurbishment and change of use of no's 4, 6, 7, 9, 10 and no's 20 to 28 Denmark Street, 4 Flitcroft Street and 1 Book Mews to provide 1551 sqm of office floor space; 2553 sqm GIA of private residential floor space; 242 sqm GIA of affordable residential floor space; and 2023 sqm GIA of retail floor space. Provision of a new pedestrian route from Andrew Borde Street to Denmark Street at ground floor level.

- 1.9 An associated planning application seeks consent for the following

Change of use from office (B1) to residential (C3) at 71 Endell Street to provide 7 affordable residential units (2 x 1 bed flats, 3 x 2 bed flats and 2 x 3 bed flats) and associated external alterations.

- 1.10 Advertisement consent is being sought for the following:

1912 sqm of digital installations to the internal walls, ceiling and floor of the proposed Urban Gallery bordered by Denmark Place, Charing Cross Road and Andrew Borde Street.

- 1.11 Listed Building Consents are being sought for the following:

6 Demark Street

Works to 6 Denmark Street involving the replacement of non-original windows with six over six sliding sash casements, replacement of modern clay tiles with reclaimed natural slate, repair and refurbishment of existing brickwork and shopfront and the replacement of front roof dormer windows.

7 Denmark Street

Works to 7 Denmark Street involving the replacement of non-original windows with six over six sliding sash casements, replacement of modern clay tiles with reclaimed natural slate, repair and refurbishment of existing brickwork and shopfront and the replacement of front roof dormer windows.

9 Denmark Street

Works to 9 Denmark Street involving the replacement of non-original windows with six over six sliding sash casements, replacement of modern clay tiles with reclaimed natural slate, repair and refurbishment of existing brickwork and shop front. Enclosure of rear roof terrace and removal of metal fire escape.

10 Denmark Street

Works to 10 Denmark Street involving the replacement of non-original windows with six over six sliding sash casements, replacement of modern clay tiles with reclaimed natural slate, repair and

refurbishment of existing brickwork and shop front. Removal of a recent front roof top extension and restoration of roof to match 9 Denmark Street. Enclosure of rear roof terrace and removal of metal fire escape.

20 Denmark Street

Works to 20 Denmark Street involving replacement of modern clay tiles with reclaimed natural slate, works of refurbishment and repair to existing brickwork, windows and shopfront.

26 Denmark Street

Works to 26 Denmark Street involving new period sliding sash casements to first and second floor windows and works of refurbishment and repair to existing roof, brickwork, windows and shopfront.

27 Denmark Street

Works to 27 Denmark Street involving replacement rolled lead roof and works of refurbishment and repair to existing brickwork, windows and shopfront.

59 St Giles High Street

Works to 59 St Giles High Street including relining of roof with reclaimed tiles and works of refurbishment and repair to existing brickwork, windows and shopfront.

The Submission

1.12 This Planning Statement provides a general description of the proposed development and an assessment of the proposals against relevant national, regional and local planning policy guidance. This Statement should be read and considered in conjunction with the following technical reports and supporting documents:

- Planning Application Form
- Planning Statement – prepared by Turley Associates

- Design and Access Statement (including Crime Impact Assessment) – prepared by ORMS Architects
- Environmental Statement Volume 1: Main Report – prepared by Buro Happold
- Environmental Statement Non-Technical Summary – prepared by Buro Happold
- Affordable Housing Statement – prepared by GL Hearn
- Transport Assessment – prepared by Buro Happold
- Venue Management Plan – prepared by Charcoal Blue
- Heritage Statement – prepared by Turley Associates
- Office Demand Report – prepared by Monmouth Dean
- Statement of Community Involvement – prepared by Four Communications
- Energy Statement – prepared by Buro Happold
- Sustainability Statement – prepared by Buro Happold
- Structural Report – Façade Retention prepared by Engenuti
- Crossrail Design Statement prepared by Engenuti

The Planning Statement

- 1.13 The background to the application submission, including details of the site and surroundings and relevant policy designations is provided at Section 2. A detailed description of the proposed development and the overarching concept for the proposals is provided at Section 3 and an evaluation of the key planning considerations is provided at Section 4. Summary and conclusions are given at Section 5.
- 1.14 The key planning considerations are summarised below and expanded in detail within the remainder of the report:
- Provision of an iconic development in the heart of London, capitalising on the advent of Crossrail and strengthening the rich cultural heritage of the surrounding area;

- Management of the impact of predicted pedestrian flows from the new Crossrail/LUL station;
- Third shelf retail opportunities to contribute to the regeneration of the east end of Oxford street and to ensure the on-going relevance of the music heritage of Denmark Street;
- Contribution towards a new public space at Tottenham Court Road;
- Provision of active ground floor frontages to contribute to the proposed public spaces and streets;
- Provision of a new route through to Denmark Place and Denmark Street beyond to improve pedestrian movements in the area;
- Notable contribution to housing, and affordable housing, as part of this varied mixed use development;
- Protection of the music heritage of Tin Pan Alley through increased control on occupiers within Denmark Street and linkages with the new Urban Gallery and Event Gallery space;
- A sustainable development which will not have any unacceptable impact on the amenity of nearby occupiers.

2. Site, Surroundings and Policy Context

Site and Surroundings

- 2.1 The application site consists of 4 core areas, these being the area to the north of Denmark Place, the area lying between Denmark Place and Denmark Street north, properties to the south of Denmark Street (hereafter referred to as 'the application site'), and 71 Endell Street which is submitted as a standalone planning application.
- 2.2 As noted by the Denmark Place Planning Brief (adopted July 2004) the main site lies at the very heart of the west end of London. Immediately to the north is St Giles Circus, an important crossroads of some of the West ends busiest streets – Oxford Street, New Oxford Street, Tottenham Court Road, Charing Cross Road and St Giles High Street.
- 2.3 St Giles Circus is also a strategically important pedestrian hub, lying as it does at the heart of some of London's most popular visitor attractions, including Tottenham Court Road, Bloomsbury and the British Museum to the north, Holborn to the east, Covent Garden, Shaftesbury Avenue and London's Theatreland to the south east and south, and Soho and Oxford Street to the west.
- 2.4 With the advent of Crossrail and other significant developments in the area the importance of St Giles Circus as a pedestrian hub will increase even further, making this a key gateway site for this area of Central London
- 2.5 Denmark Street itself is locally known as 'Tin Pan Alley' and is renowned as an important centre of the UK popular music industry. Over the years it has attracted specialist retailers, first in music publishing and more recently in the sale and repair of pop music instruments, particularly guitars, keyboards and percussion instruments. Away from the street frontages there are offices and some clubs. The street has acquired a unique interest through the presence of music businesses.
- 2.6 Historically the main site formed part of a larger triangle of land that extended to St Giles Circus. The northern tip of this triangle was then demolished to make way for the traffic works associated with the Centre Point development. In 1965 proposals to redevelop the remainder of the site failed to gain the required Office Development Permit and further planned highway improvements were also abandoned leaving the area unfinished and unresolved. The site's northern flank walls fronting on to Andrew Borde Street – since demolished by Crossrail – were a legacy of this period.

- 2.7 The main body of the application site lies within the Denmark Street Conservation Area and includes a number of listed buildings and 'Positive Contributors' identified by Camden Council. 71 Endell Street lies within the Seven Dials Conservation Area and is identified as a 'Positive Contributor' by Camden Council.
- 2.8 As well as heritage assets within the application site, there are a number of notable buildings adjacent to the site, including the Grade II Centre Point Tower and Centre Point Flats to the north and east and the Grade 1 Listed St Giles Church immediately to the south.

Policy Designations

- 2.9 The site lies within the Central London Area with the small area that lies along Charing Cross Road being designated as Central London Frontage as designated in the Core Strategy. The main body of the site lies within the Denmark Street Conservation Area and is designated as an Archaeological Priority Area.
- 2.10 The site lies within the Tottenham Court Road Opportunity Area as designated by the London Plan and is identified by Core Strategy policy CS2 as a Growth Area.
- 2.11 In addition to the policies contained within the adopted LDF the site is subject to a number of specific policy documents consisting of a Planning Brief for Denmark Place (adopted July 2004), Tottenham Court Road and St Giles High Street Area Planning Framework (adopted July 2004) and the emerging Site Allocations Local Development Framework document (proposed submission document March 2012). The area also sits within one of Camden's Place Shaping areas and the Council have been consulting with residents and other parties to produce a Place Plan.
- 2.12 A detailed assessment of the site specific policy aspirations for the site are provided at Section 4 of this report, however the key implications on scheme development can be outlined as follows:
- Need for improvements to the public realm and the pedestrian environment in the area;
 - Provision of active ground floor frontages whilst appreciating the potential impact of the new Tottenham Court Road station exit;
 - Support for the area's music heritage;
 - Development which responds to the character of the area whilst acknowledging the site's location within an Opportunity Area and Growth Area.

Relevant Planning History

2.13 In 1990 the St Giles Partnership submitted a planning application (PL/9000462R1) alongside various applications for Listed Building and Conservation Area consent for the majority of the site. The applications proposed:

- Demolition of all the properties on site except those fronting Denmark Street and Shaldon Mansions;
- An 8 storey block with basement car park, ground floor retail/A3 and upper floors B1 uses on the northern half of the site;
- Residential blocks of 5 and 6 storeys arranged around a courtyard at the eastern end of Denmark Place;
- A 5 storey block on Denmark Place for Class B1c (studios) plus basement museum for contemporary music;
- Refurbishment of the buildings fronting Denmark Street with retail/A3 uses on the ground floor and residential and B1 uses on the upper floors;
- Refurbishment of Shaldon mansions for continued residential uses.

2.14 This planning application was refused in March 1991 on the following grounds:

- i) The site was required for construction of the Crossrail and Chelsea/Hackney lines;
- ii) The office, residential and studio blocks were too high and bulky;
- iii) Demolition and alterations to buildings, some of which were listed, would neither preserve or enhance the character of the Conservation Area;
- iv) The proposals could harm the Denmark Street music industry;
- v) The proposals would result in the loss of rented residential accommodation (subsequently dropped).

2.15 The refusals were subsequently appealed and dismissed for the following reasons:

- vi) The site was needed as a construction site for Crossrail;
- vii) No justification for the demolition of 16 Denmark Place.

2.16 Key matters for consideration in any proposals for future development were as follows:

- The proposed development would not be unacceptable in its impact on its surroundings and on the character and appearance of the Conservation Area;
- The view of St Giles Church from Oxford Street was not so important to preclude otherwise acceptable development;
- If planning permission for the development should be granted there would be no obstacle to the granting of Conservation Area Consent for the demolition of unlisted buildings in the CA;
- Denmark Street's music specialism is a characteristic of the Conservation Area that should be retained but this could be secured by condition.

2.17 In 2001 a planning application was submitted by Consolidated Developments Ltd for the comprehensive redevelopment of the site to provide:

- 8 storey building on the northern half of the site with a music venue in the basement, restaurant on the ground floor and offices on the upper floors;
- 7 storey residential building at 57-58 St Giles High Street with street level A1 uses;
- 4 storey building along Denmark Place with leisure uses and a music education facility;
- Refurbishment of the remainder of the buildings looking onto Denmark Street for residential, retail and office purposes.

2.18 The application was subsequently withdrawn.

3. Description of Development

- 3.1 Building on the key policy objectives for this site a vision has evolved to create a world class development, taking advantage of the many strengths of the site, namely its accessible Central London location; the music and creative industry links; the historic built fabric, the mix of building styles and heights; and the potential to create strong links to the surrounding area.
- 3.2 The driving objective for this development is the essential need to reinvigorate the music and creative industries and associated retailing that has become synonymous with this part of London. The proposals seek to capitalise on the rare opportunity presented by the advent of Crossrail to provide a visionary sustainable mixed-use development of high quality design in this most central of Central London locations.
- 3.3 This reflects the aspirations of the Tottenham Court Road Station and St Giles High Street Area Planning Framework, the adopted Planning Brief for the site and the emerging LDF Site Allocation by building upon the revival of the St Giles area through the creation of a unique and people-centred place with outstandingly well designed public realm at its heart.
- 3.4 In this context it is considered that the development will make a not able contribution to both Camden and to London as a whole by resolving the dysfunctional lack of connectivity between Bloomsbury, Covent Garden and Soho through the creation of a place of character with improved movement and connections between people and places, whilst providing an urban environment which is distinctive, safe and of a human scale (Denmark Place Planning Brief 2004).
- 3.5 Detailed planning permission is sought for the redevelopment and change of use of the site to provide (GIA):
- 2955 sqm Event Gallery (Sui Generis)
 - 723 sqm Urban Gallery (Sui Generis)
 - 420 sqm of flexible A1/A3 floorspace
 - 2023 sqm of A1 floorspace
 - 2995 sqm of A3 floorspace
 - 1066 sqm of A4 floorspace

- 1551 sqm of B1 floorspace
- 28 bedroom boutique hotel (Use Class C1)
- 3487 sqm of new and refurbished residential floorspace (Use Class C3), 692 sqm of which will be provided as a standalone affordable housing development at 71 Endell Street (subject to a separate planning application)

3.6 Advertisement consent is sought for:

- 1912 sqm of digital installations to the internal walls, ceiling and floor of the proposed Urban Gallery bordered by Denmark Place, Charing Cross Road and Andrew Borde Street.

3.7 Conservation Area Consent is sought for:

- Demolition of York and Clifton Mansions behind a retained façade;
- Demolition of 1-6 Denmark Place
- Demolition of 18-21 Denmark Place

3.8 Listed Building Consent for:

- Works of repair and refurbishment to 6, 7, 9, 10, 20, 26, 27 Denmark Street and 59 St Giles High Street

3.9 A breakdown of floorspace figures and the proposed residential mix is provided in Tables 3.1 – 3.3 below:

Table 3.1: Existing and Proposed Floorspace (including 71 Endell Street)

Schedule of Floorspace (GIA)	Crossrail Site (Demolished)	Existing	Baseline	Proposed	Variance
A1 Shops	749	2587	3336	2023	(1313)
A3 Restaurants & Cafes	312	925	1237	2995	(1758)
Flexible A1/A3				420	420

A4 Drinking Establishment		368	368	1066	698
Sui Generis Nightclub	1376		1376		(1376)
B1 Business	1365	5375 (682 Endell Street)	6740 (682 Endell Street)	1418	(5189) (4497 main site)
C1 Hotel				2239	2239
C3 Dwelling House Private		1653	1653	2553	900
C3 Dwelling House Affordable				692	692
C3 Dwelling House S/O		-		242 (total 3487 sqm)	242 (Total 1834)
Sui Generis (Basement Space)				2995	2995
Sui Generis (Urban Gallery)				723	723
Total	3802sqm	10,908sqm	14,710 sqm	17,366 sqm	2656 sqm

Table 3.2 Existing and Proposed Residential Unit Mix by Address

Address	Existing	Proposed	Total Units
York and Clifton	10 x Studio		-16

Mansions	6 x 1 bed		
21-25 Denmark Street	-	7 x 2 bed 1 x 3 bed	+8
22 Denmark Street/18 Denmark Place	1 x studio 3 x 1 bed 1 x 2 bed		-5
24 Denmark Street	1 x 1 bed		-1
26 Denmark Street	3 x studio	1 x 3 bed	-2
4 Denmark Street		2 x 2 bed	+2
6 Denmark Street	1 x studio	1 x studio 3 x 1 bed	+3
7 Denmark Street	1 x 1 bed	3 x 1 bed	+2
9 Denmark Street		3 x 1 bed	+3
10 Denmark Street		3 x 1 bed 1 x studio	+4
4 Flitcroft Street		3 x 2 bed	+3
71 Endell Street		2 x 1 bed 3 x 2 bed 2 x 3 bed	+7

Total	27	35	+8
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Table 3.3 Existing and Proposed Unit Mix

Unit Size (bedrooms)	Studio	1	2	3
Existing	15	11	1	
Proposed	2	14	15	4
Variance	-13	+3	+14	+4

4. Key Planning Considerations

- 4.1 This section of the Statement provides a detailed assessment of the application proposals against relevant policy objectives together with other relevant material considerations.

Planning Policy Context

- 4.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications are to be determined in accordance with the development plan unless other material considerations indicate otherwise. At national and regional level the development plan comprises the National Planning Policy Framework (adopted March 2012) and the London Plan (adopted 2011). At the local level the development plan is comprised of Camden's Core Strategy and Development Plan Policy document (both adopted November 2010), which form the central element of the Local Development Framework (LDF). The following documents are also considered relevant to these proposals:

- Camden Planning Guidance (adopted 2011);
- Emerging LDF Site Allocations Document (Submission Version March 2012);
- Revised Planning Guidance for Central London (adopted 2007);
- Planning Framework for the Tottenham Court Road Station and St Giles High Street Area (adopted 2004);
- Planning Brief for Denmark Place (adopted 2004);
- Denmark Street Conservation Area Appraisal (March 2010)

Principle Planning Issues

- 4.3 As supported by the London Plan, the Local Development Framework and the numerous planning documents listed at paragraph 4.2 the site is considered to represent a major development opportunity within this area of Camden, particularly to the north of Denmark Place. In this context the development proposals are considered to be consistent with a wide range of policy objectives.
- 4.4 The key considerations associated with the proposals are examined in the remainder of this chapter:

- Context for Development
- Mixed Use Development
 - Office Floorspace (Use Class B1)
 - Retail (Use Class A1)
 - Urban Gallery (Sui Generis)
 - Event Gallery (Sui Generis)
 - Hotel (Use Class C1)
 - Food, Drink and Entertainment Uses (Use Class A3/A4)
- Housing
 - Mix of units
 - Affordable Housing Provision
 - Amenity Space
 - Wheelchair Housing and Lifetime Homes
- Townscape and Design
 - Design Rationale
 - Public Realm and Permeability
 - Denmark Place
 - Refurbishment within Denmark Street
 - Demolition of Unlisted Buildings in Conservation Area
- Amenity
 - Lighting
 - Sunlight/Daylight
- Traffic and Transport
 - Car and Cycle Parking
 - Servicing

- Energy and Sustainability

Context for Development

- 4.5 The core of the site occupies an irregular quadrilateral of land boarded by Denmark Street, Charing Cross Road, Andrew Borde Street and St Giles High Street. Denmark Place, a pedestrian alley, cuts across the site from east to west dividing the site into two parts. This area is noted by the emerging LDF Site Allocations Document to represent the major development opportunity in the area and notes that its redevelopment will be crucial to the success of the wider area *'In the creation of edges to streets and spaces and the quality of the design solution in response to the character and appearance of the area as a whole.'*(p.74)
- 4.6 Denmark Street itself is known as 'Tin Pan Alley' and is renowned as an important centre of the UK music industry. Following previous decline Consolidated Developments have actively sought to encourage music related retailers and associated uses back to the area and continue to support its role in the British music scene.
- 4.7 To facilitate the construction of the Tottenham Court Road Crossrail station and the upgrade of the existing LUL station the northern portion of the application site has been temporarily taken over by Crossrail and the majority of buildings to the north of Denmark Place have been demolished.
- 4.8 The application site falls within the Tottenham Court Road Opportunity Area as designated by the London Plan, which identifies and promotes the site and surrounding area as being capable of accommodating substantial development to provide new jobs or homes. The London Plan notes that these areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density, both of which apply to the application site.
- 4.9 The London Plan designation has been continued at local level at Core Strategy policy CS2 with Camden designating the Tottenham Court Road area as a Growth Area, with an expectation that 360 new homes and around 2,500 jobs will be provided up to 2031. The designation notes that transport enhancements associated with the development of Crossrail will be key to growth and seeks a balanced mix of uses, an excellent public realm, improvements to pedestrian routes, maximised densities and development of the highest quality.
- 4.10 It is noted that the position of the main development site is particularly complex as it addresses a diverse range of conditions, ranging from the historic buildings on

Denmark Street to the new station entrances and planned spaces to the north of Andrew Borde Street, as well as the setting of Centre Point and the scale and building line of the historic St Giles High Street. On the western edge the site must address the more commercial frontage of Charing Cross Road as well as the new developments proposed beyond, resulting in a wide range of complexities and sensitivities to be considered.

Mixed Use Development

- 4.11 The development proposes a mix of uses as appropriate to its Central London location including retail, office, residential, hotel, cultural and entertainment, bar and restaurant uses. This is in line with Development Plan policy DP1 which requires a mix of uses within developments, including a contribution towards the supply of housing.
- 4.12 The mix of uses is also supported by the Denmark Place Planning Brief which considers hotels, leisure, entertainment and cultural uses as appropriate in this location, particularly as it is so well located in relation to the transport network, established centres of tourism and the Central London Area generally.
- 4.13 The emerging site allocations document notes that residential and non-residential densities should be optimised to provide new homes and jobs and states the following objective for development:

“A mix of uses and active ground floor frontages involving part redevelopment and part sympathetic restoration/refurbishment and adaptation, retaining and contributing housing, employment floorspace, and vitality through new retail and leisure activities in the right places.” (LDF Site Allocations Site 16)

- 4.14 The proposed mix of uses is thus considered to comply with planning policy at the general scale.

Office Floorspace (Use Class B1)

- 4.15 Whilst 1551 sqm (GIA) of new business floorspace will be provided as part of the redevelopment proposals, there will be a loss of 4497 sqm (GIA) of existing B1 space across the main development site. 1543 sqm of this loss has already taken place as a result of Crossrail demolition, with the remaining loss stemming from the proposed change of use of properties on Denmark Street, Flitcroft Street and Endell Street to provide housing and affordable housing. The principle of the loss

of office floorspace must therefore be established in order to progress successfully with the wider proposals.

- 4.16 Under paragraph 51 of the NPPF local planning authorities should normally approve planning applications for change of use to residential from B use classes where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development should not be appropriate.
- 4.17 Policy 2.13 of the London Plan relates to Opportunity Areas and Intensification Areas and as such is relevant to the development site which lies within the Tottenham Court Road Opportunity Area. Policy 2.13 stipulates that development proposals within opportunity areas should seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth and where appropriate contain a mix of uses.
- 4.18 At the local level Core Strategy Policy CS8 is relevant in that it seeks to secure a strong economy in Camden through the promotion of office floorspace within Kings Cross, Euston and Central London and the protection of existing employment sites and premises that meet the needs of employers.
- 4.19 Within the reasoned justification for policy CS8 paragraph 8.8 notes that the future supply of offices in the borough should meet projected demand and consequently proposals for other uses of older office premises if they provide permanent housing (in particular affordable housing) will be considered.
- 4.20 Policy DP13 adds further detail to Camden's approach to employment premises stating that the Council will retain land and buildings that are suitable for continued business use and will resist change to non-business unless:
- a) It can be demonstrated to the Council's satisfaction that a site or building is no longer suitable for its existing business use; and
 - b) There is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.
- 4.21 The policy goes on to note that, when it can be demonstrated that a site is not suitable for any business use other than B1(a) offices, the Council may allow a change to permanent residential uses or community uses. When assessing proposals that involve the loss of a business use the LPA will consider whether there is potential for that use to continue, giving consideration to a number of factors as outlined below.

4.22 Camden Planning Guidance (CPG5) clarifies the circumstances where a change of use from offices may be acceptable. Of particular relevance it states that new office accommodation coming on stream during the plan period will meet projected demand. The guidance at paragraph 6.4 goes on to list various criteria to be taken into account when assessing applications for a change of use from B1 to a non-business use. These include factors such as the age and condition of premises; whether the premises include features required by tenants seeking modern office accommodation; the quality of the premises and whether it is purpose built accommodation; and whether there is evidence of demand.

4.23 With regard to policy DP13 and CPG5 criteria, a summary is provided below:

DP13

Located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing

- *The site is not located in or adjacent to the Industry Area and as the premises are located within a busy area of Central London they are not suitable for large scale general industry and warehousing.*

Is in a location suitable for a mix of uses including light industry and local distribution warehousing

- *The premises are located in an area which is suitable for a mix of Central London uses including retail, restaurant, bar, entertainment, hotel and residential but the area is not suitable for light industry and local distribution warehousing due to space restrictions, pressure on the local highway and existing residential amenity.*

Is easily accessible to the Transport for London Road Network and/or London Distributor Roads

- *The premises are easily accessible from the Transport for London Road Network but the roads in this area of London are predominantly occupied by buses, taxis and cars.*

Is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water

- *The premises are accessible by Underground, bus, taxi and cycle and will also be accessible by Crossrail upon its completion. There is no potential for the premises to be serviced by rail or water.*

Has adequate on-site vehicle space for servicing

- *There is no on-site space for servicing on Denmark Street or Flitcroft Street; however there is limited space for small vehicles at Endell Street.*

Is well related to nearby land uses

- *The site is located within the Central Activities Zone and is in an area characterised by a mix of retail, restaurant, bar, office, residential and night time uses. A range of uses is therefore appropriate for this area.*

Is in a reasonable condition to allow the use to continue

- *The existing office floorspace is of a very poor quality, being located in an ad hoc manner throughout the upper floors of Denmark Street – including within listed buildings – and within Endell Street. The properties are in various stages of disrepair and have reached the end of their economic life in commercial terms. Further detail relating to the condition of the buildings are provided later in this section and within the Agent's report which is submitted alongside this document.*

Is near to other industry and warehousing, noise/vibration generating uses, pollution and hazards

- *The premises are not located close to other industry and warehousing uses and noise/vibration generating uses, pollution or hazards.*

Provides a range of unit sizes, particularly those suitable for small businesses (under 100 sqm)

- *The size of premises available ranges from 70 sqm to 263 sqm (GIA). As noted in the accompanying Agent's Report smaller occupiers tend to require shorter leases with heavy discounts making them high risk in terms of revenue generation. The return required to bring the premises up to a more suitable standard of accommodation and to aid in the funding of the wider development is not achievable as a result.*

CPG5

The age of the premises (some older premises may be more suitable to conversion)

- *The premises, a number of which are Grade II listed, were primarily constructed in the 17th century as town houses and as such it is extremely*

difficult to undertake appropriate interventions to bring the floorspace up to modern day office standards. As the Denmark Street properties were purpose built for residential purposes they are particularly suited for conversion to residential use.

Whether the premises include features required by tenants seeking modern office accommodation

- *As noted above the existing office floorspace is accommodated across a number of historic buildings, some of which are Grade II listed. As such the premises do not include features required by tenants seeking modern office accommodation and the ability to upgrade the floorspace to meet such requirements is severely restricted by the need to preserve the historic fabric of the premises.*

The quality of the premises and whether it is purpose built accommodation (poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion)

- *None of the existing floorspace was purpose built for office use, with the properties on Denmark Street originally being constructed as Town Houses in the 17th and 18th century and both 71 Endell Street and 4 Flitcroft Street originally being constructed for warehousing purposes. The existing office floorspace is clearly outdated by modern office standards, being located in small pockets across the development site and often within listed buildings which offer minimal opportunity for alterations to upgrade the floorspace. As noted within this Planning Statement and the accompany Agent's report a significant amount of investment would be required to improve the floorspace, and even then the inherent restrictions of the buildings – in particular the historic and listed buildings, would prevent the floorspace from meeting modern standards.*

Whether there are existing tenants in the building and whether these tenants intend to relocate

- *There are existing tenants within the buildings but these are on short leases. The Applicant has committed to offering existing tenants first refusal on the new office floorspace being provided as part of the wider redevelopment.*

The location of the premises and evidence of demand for office space in this location

- *The accompanying Agent's report notes that in 2011 the take up of office space in the west end was 3.3 million sq ft, a decrease on 2010. In q1 of 2012 take up fell to just under 1 million sq ft, the lowest level since 2009. This is circa 16% below the long term average. Second hand stock was worst hit. Pre letting activity in the West End has been almost nonexistent in 2012 and, whilst supply of new Grade A office space is slightly below the long term average, demand is very limited. There are a number of notable schemes in close proximity to the premises which have/will provide significant office floorspace, including 1 Oxford Street which will deliver 14,708 sqm GEA of office accommodation and the completed Central St Giles scheme which has provided 52,970 sqm GEA of office accommodation.*

Whether the premises currently provide accommodation for small and medium businesses

- *Existing tenants predominantly occupy space ranging from 70 sqm to 263 sqm. The accompanying Agent's Report notes that smaller occupiers tend to require shorted leases with heavy discounts making them high risk in terms of revenue generation, which in turn impacts on the ability to upgrade the office floorspace and ensure the long term future of these historic and listed buildings.*

4.24 The existing office floorspace is clearly outdated by modern office standards, being located in small pockets across the development site and often within listed buildings which offer minimal opportunity for alterations to upgrade the floorspace. The poor quality of the floorspace impacts significantly on the quality of potential tenants and lease length, with leases having early break periods, substantial rent free periods and caps on service charge. These factors, coupled with the restrictions of the historic buildings and the capital expenditure required to bring them up to modern standards, means that continued office use would not support the long term future of these buildings. A change of use to provide housing, and in particular affordable housing, should therefore be considered an acceptable solution to securing the future of these buildings.

4.25 In this context it is considered that the proposed conversion of office space to provide housing and affordable housing meets the requirements of Policies CS8, CS9, DP13, and the provisions of CPG5, as well as NPPF and London Plan requirements.

4.26 Whilst the NPPF, London Plan and Camden's LDF are the most up to date policy documents, and therefore considered to be the most relevant, it is noted that

Camden have saved their 'Guidance for Central London: Food, Drink and Entertainment, Specialist and Retail Uses' which was adopted in October 2007.

- 4.27 Of relevance to the development is Section 14 of the Guidance which notes at paragraph 14.2 that the Council will not grant planning permission for development involving the loss of retail uses at ground floor and other levels and Class B1 uses at upper floors of 8 – 27 and 4 – 11 Denmark Street. It is noted that the development proposals include a change of use of 1224 sqm (GIA) of B1 floorspace across the upper floors of 20-26 Denmark Street and 972 sqm (GIA) across the upper floors of 4 -10 Denmark Street to provide housing and affordable housing in line with the requirements of mixed use policy DP1.
- 4.28 Whilst Camden have not sought to replace the Supplementary Planning Guidance (SPG) with Camden Planning Guidance it is noted that the SPG was originally produced to provide additional information on how policies in the Unitary Development Plan (UDP) should be interpreted and implemented. Seeing as the UDP – including saved policies – has now been fully replaced by Camden's Core Strategy and Development Policies Documents the material weight of the SPG is questioned.
- 4.29 As well as predating current planning policy it is noted that the SPG predates the Crossrail Act receiving Royal Assent, which happened in July 2008. It is thus considered that the importance of Denmark Street as part of a comprehensive redevelopment of the surrounding area could not have been fully appreciated and the protectionist stance previously undertaken towards B1 floorspace on Denmark Street must therefore be revisited in light of current guidance contained within the NPPF, London Plan, and LDF documents.
- 4.30 Whilst the status of the SPG is questioned the aspiration of protecting the music specialism of Denmark Street is not and as such the desire to support and promote the music industry has formed a central role in the development of the proposals. As such it is proposed to offset the loss of office floorspace to provide residential floorspace to meet the requirements of Policy DP1 by the provision of 1551 sqm GIA of replacement office floorspace with restrictions on the floorspace to ensure only music related uses can occupy the space.
- 4.31 At present there are no restrictions on the occupiers of the existing office space, as demonstrated within Table 4.1 which identifies where music related uses currently exist within the application properties on Denmark Street.

Table 4.1 – B1 Occupiers on Denmark Street

Address	Tenant	Music Related Use
4 Denmark Street	Z Hotels Management (Hotels)	No
4 Denmark Street	Roundtable Films (Film Editors)	No
6 Denmark Street	Greenfly Investments Ltd (Architects)	No
6 Denmark Street	Rabbit & Hare Limited (Designers)	No
7 Denmark Street	NFH Limited (Film Writers)	No
7 Denmark Street	PMA Production Services LTD (Production Company)	No
9 Denmark Street	Miss Di Fusco (Recruitment Agency)	No
9 Denmark Street	Mr Tim Marten (Guitar Repair Shop)	Yes
9 Denmark Street	Ali Serder Akman (Tile Manufacturer)	No
9 Denmark Street	Mr Fabio Cutolo (Guitar Repair Shop)	Yes
10 Denmark Street	Suite 16 (UK) Ltd (Medical Communications)	No
20 Denmark Street	Finatran Ltd (Book Sellers)	No
20 Denmark Street	OB Media Partners Ltd (Media Company)	No
20 Denmark Street	Beat Films Ltd (Film Company)	No
21 Denmark Street	Carmody Groarke Ltd (Architects)	No
21 Denmark Street	Christopher Condu (Administration)	No

21 Denmark Street	Celine Camerlynck (Instrument Repair)	Yes
21 Denmark Street	Holiday FM Radio Ltd	Yes
22 Denmark Street	Roast Beef Productions (TV Company)	No
23 Denmark Street	Upstart Films Ltd (TV Company)	No
23 Denmark Street	Firststart Ltd (Magazine Publishers)	No
23 Denmark Street	Factory 311 Ltd (Photography)	No
24 Denmark Street	Venus Business Communications Ltd	No
24 Denmark Street	Studies Planet.com Limited (Student Recruitment Agency)	No
25 Denmark Street	TRI V Limited (Education Agency)	No
25 Denmark Street	Broadmargins Ltd (Internet Sales)	No
25 Denmark Street	Mapp Editions Ltd (Publishing Company)	No
25 Denmark Street	URB-Orbis Ltd (Media Company)	No
25 Denmark Street	Rage Music Ltd	Yes
25 Denmark Street	Octavian Press Ltd (Proof Reading Company)	No

4.32 As can be seen from the table the majority of the B1 floorspace currently provided on Denmark Street is occupied by users not related to the music industry, with only 374 sqm (GIA) of the 2196 sqm of B1 floorspace being occupied by uses related to music. As part of the development 1087 sqm (GIA) of B1 floorspace will be provided within Denmark Street and the existing music-industry related uses will be offered first refusal of this space with any remaining floorspace being restricted for

occupation only by other music related uses. In this context it is considered that there will in fact be an increase of 713 sqm of B1 floorspace for music related uses when compared to the current situation and the aspirations of the SPG are thus considered to be met.

Retail (A1)

- 4.33 The development site lies within Central London and as such should be promoted as a part of a competitive town centre which provides customer choice and a diverse retail offer in line with the NPPF, London Plan and LDF aspirations. Accordingly the development proposals include 2023 sqm (GIA) of traditional retail floorspace, in addition to 'Third Shelf Retail' opportunities within the Urban Gallery.
- 4.34 Notwithstanding the above, the development proposals result in the loss of 564 sqm (GIA) of secondary retail floorspace, with a further 749 sqm of retail floorspace having already been demolished as part of the Crossrail works. Of the 564 sqm of existing floorspace 128 sqm will be lost at 21 Denmark Street to provide a new pedestrian route through the site with the remaining 436 sqm (currently used for back of house/storage purposes) being lost to provide small business units and residential floorspace within Denmark Street.
- 4.35 Whilst the proposals result in the loss of traditional retail floorspace 723 sqm of *Sui Generis* floorspace to be utilised for 'third shelf retail' (amongst other uses) will be provided within the Urban Gallery as part of the proposals. Whilst traditionally there have always been two 'shelves' in retail. The first can be found in the retail store and is where the product is most often evaluated and ultimately purchased with the second shelf being the consumer's home where usage takes place. However there is now a 'third shelf', fuelled by the emergence of third wave technologies, where consumers can consider, interact with, or buy a product outside of the store or home.
- 4.36 Third wave technologies are about meeting those demands and presenting information back to consumers in ways that haven't been possible before, for example using virtual reality to try clothes on, or watching a music video and purchasing the track at the same time. For consumers the technology drives a more personal experience, enabling software and systems to react to an individual and making it easier for consumers to interact with and experience products.
- 4.37 For the high-end sunglass manufacturer the third shelf could take the form of an augmented reality store where beachgoers can virtually try on and order sunglasses using their mobile device and have them delivered directly to them at

the beach. For a sandwich shop it might be an interactive menu conveniently placed on a commuter route, enabling customers to text their lunch order on their way to work. There is no limit to where the third shelf can be and the Urban Gallery seeks to capitalise on this, complementing the more traditional retail model of Denmark Street with third wave technology.

- 4.38 It is noted that Core Strategy policy CS7 provides centre specific planning objectives, noting the need to improve the pedestrian environment at Charing Cross Road, particularly at the northern end and including St Giles Circus. This aspiration is supported by policy CS9 (Achieving a Successful Central London) which seeks to improve the quality of the area's streets and places, the connections between them and the ease of movement into, and through, the area. It is noted that the loss of the retail unit currently located at 21 Denmark Street is required to accommodate a new pedestrian route through the site, provided at the request of the LPA, to address pedestrian congestion and permeability in the area. It is noted that the emerging Site Allocation for the area also promotes this new pedestrian route, noting *"a new link via Denmark Place to the station and new public space around Centre Point would assist pedestrian movement."*
- 4.39 Whilst the NPPF, London Plan and Camden's LDF are the most up to date policy documents, and therefore considered to be the most relevant, it is noted that Camden have saved their 'Guidance for Central London: Food, Drink and Entertainment, Specialist and Retail Uses' which was adopted in October 2007.
- 4.40 Of relevance to the development is Section 14 of the Guidance which notes at paragraph 14.2 that the Council will not grant planning permission for development involving the loss of retail uses at ground floor and other levels and Class B1 uses at upper floors of 8 – 27 and 4 – 11 Denmark Street. It is noted that the development proposals include a change of use of 564 sqm (GIA) of secondary A1 floorspace across 20-26 Denmark Street i.e back of house/storage to provide housing and B1 floorspace to meet the requirements of mixed use policy DP1.
- 4.41 Whilst Camden have not sought to replace the Supplementary Planning Guidance (SPG) with Camden Planning Guidance it is noted that the SPG was originally produced to provide additional information on how policies in the Unitary Development Plan should be interpreted and implemented. Seeing as the UDP – including saved policies – has now been fully replaced by Camden's Core Strategy and Development Policies Documents the material weight of the SPG is questioned.
- 4.42 As well as predating current planning policy it is noted that the SPG predates the Crossrail Act receiving Royal Assent, which happened in July 2008. It is thus

considered that the importance of Denmark Street as part of a comprehensive redevelopment of the surrounding area could not have been fully appreciated and the protectionist stance previously undertaken towards A1 floorspace on Denmark Street must therefore be revisited in light of current aspirations for the site and planning policy guidance contained within the NPPF, London Plan, and LDF documents.

- 4.43 Whilst the status of the SPG is questioned the aspiration of protecting the music specialism of Denmark Street is not and as such the desire to support and promote the music industry has formed a central role in the development of the proposals. As such the proposed loss of retail floorspace to meet the requirements of Policy DP1 is offset by the significant amount of Sui Generis space (3678 sqm GIA) being provided within the Urban Gallery and Event Gallery as part of the scheme which will have a central focus around the music specialism of Denmark Street.
- 4.44 It is also of significant note that the Denmark Street Traders Association fully support the proposals on the basis that the regeneration and rejuvenation of Denmark Street will have a major positive impact on the continuation of the music heritage and culture of 'Tin Pan Alley'.
- 4.45 In this context the loss of retail floorspace, the majority of which is secondary, is considered to support the policy aims of the Core Strategy as well as the more specific guidance within Camden's Site Allocation for St Giles relating to permeability and pedestrian movements.

Urban Gallery (Sui Generis) and Digital Skin

- 4.46 Central to the development is the proposed Urban Gallery which has been developed within the wider context of Camden as a centre for creativity. Both the London Plan and Camden's LDF advocate retail, culture, entertainment and tourism uses at this location and as such the ambition for St Giles is to be an internationally recognised destination for these uses, providing inspiration in the heart of London. The building will be a 'culture beacon' and starting point within the city, inspiring people to experience the best London has to offer.
- 4.47 The Urban Gallery is formed within the larger of the two new buildings and consists of an internalised open space for use by members of the public passing through the site, or visiting the area as a destination in its own right. The building is fully openable at ground floor level on three sides, enabling permeability through the site from Charing Cross Road, Andrew Borde Street and, more importantly, from the new Tottenham Court Road Crossrail exit which is located immediately

opposite the development site. A detailed description of the architectural strategy relating to the Urban Gallery is provided with the Design and Access Statement.

- 4.48 The Urban Gallery is proposed as Sui Generis floorspace, enabling it to respond to the ever-changing requirements of those who pass through the space within the course of each day, as well as interacting with the other uses proposed for the site, in particular the Events Gallery located at basement level of the development. The space is designed to captivate people as they pass through, connecting them through 'third wave technology' (refer to paragraphs 4.35 – 4.37) with what London has to offer.
- 4.49 A 'digital skin' is proposed within the urban gallery to create a carefully curated internal environment. Accordingly an Advertisement Consent Application is submitted alongside this application, justifying the proposed digital screens in terms of both amenity and public safety.
- 4.50 The proposals represent a move away from conventional advertising, seeking to engage people in new and relevant ways. For a space to be relevant and engaging to its users, it needs to offer the chance for interaction. The problem with conventional advertising is that it is a one-way process – brands post a message for a short period of time, people sometimes absorb this message. People are becoming increasingly immune to conventional advertising and it is not benefiting people and their experiences within the city.
- 4.51 It is proposed that the digital skin will be used to engage people by being a platform for a series of themes that form a holistic view on London and the rest of the world. One way to consider this is to think of an Apple iPad. The iPad, is engaging because of its applications. It has apps for useful information – like local information and weather. It has apps for news, for staying connected with people, for wayfinding and for brands to reach their audiences in new ways. It also has apps for institutions and organisations to help people learn about what they do. St Giles can be thought of like an ever-changing media channel that provides information like the iPad, whilst it can also receive information from its users and programmers. This way, it's always changing, informing and educating.
- 4.52 The themes or apps that the digital skin could show include; Local and global information, shopping and retail (in particular third shelf retailing as outlined at paragraphs 4.35-4.37), seasonal, charity and educational alongside coverage and activation of music, film, fashion, charity and cultural events.
- 4.53 The screens are being promoted in the context of guidance prepared by CABE/English Heritage (Large Digital Screens in Public Places) which sets out a

clear set of principles which should be considered when proposals are advanced for individual sites and location. The Guidance notes that, where digital screens are carefully curated and managed, they have the potential to contribute positively to town and city centre spaces and support local policy objectives such as regeneration, economic development and community engagement.

- 4.54 Due to the nature of what is being proposed concern has previously been expressed by the LPA and other stakeholders as to how the content of the screens can be controlled in perpetuity so as to prevent wholesale advertising of a type similar to that at Piccadilly Circus. In recognition of these concerns the Developer has given due consideration to appropriate controls for the screens, thus providing sufficient comfort for the on going curation of the urban gallery.

Suggested Controls

- The Urban Gallery will be used only for uses within Use Class D2, circulation space, retail, advertising, exhibitions, brand and product launches, corporate events, screenings and uses associated with the basement venue. It must not be used for any other purposes, including any within Class A1, D1 or D2 of the Town and Country Planning (Use Classes) Order (as amended) unless otherwise agree in writing with the Local Planning Authority.
- The digital screens will be used for a combination of commercial advertising and public information on the basis of the following screen space allocated for each element as follows:

<i>Virtual Retail/ Brand Space</i>	<i>70%</i>
<i>Public Information/Community Use</i>	<i>15%</i>
<i>Music Related Content/Curated Arts/News</i>	<i>15%</i>

- The digital screen hereby approved will have a maximum brightness of 1500nit
- The illuminance of the screens will be reduced to 40% of maximum capacity between the hours of midnight and 0700 hours.
- The shutters of Building A will be permanently closed between the hours of midnight and 0700 hours.

- The digital screens will be in sleep mode between the hours of midnight and 0700 hours.

4.55 Visual examples of screen content are provided within the accompanying Design and Access Statement.

Venue Management Plan and Events Management Plan

4.56 In order to provide the LPA with sufficient comfort and controls on the use of both the Urban Gallery and the Event Gallery a Venue Management Plan (VMP) has been prepared and submitted in support of this planning application. The VMP is specifically concerned with public safety and ensuring that the operation of the development will not result in a loss of amenity to any of the surrounding businesses or residents.

4.57 The VMP has been prepared to demonstrate how the Urban Gallery and the Event Gallery will operate, not just as distinct entities but also as spaces which can be programmed to work together. It is key to note that the gallery developments will be fully operational within the confines of the boundary of the site, with an assumption that crowd spill out into surrounding spaces is not acceptable under any circumstances and both gallery spaces will thus be required to work together and support each other in order to maintain the operational integrity of the site.

4.58 It is anticipated that the independent operator of the gallery development will have full responsibility for the programming of all content in both the Urban Gallery and the Event Gallery to enable a development- wide approach to programming e.g. if the programme in the Event Gallery is likely to result in a maximum capacity attendance of 800, the Urban Gallery will be closed off to the public realm in order that it can become a ticket hall and audience holding area so it should not be simultaneously programmed.

4.59 Whilst the VMP is an overarching document addressing the gallery development as a whole, there will be a requirement for each event organiser to produce an Event Management Plans (EMP) specific to their event. The necessary content of an EMP is referenced throughout the VMP document and it is anticipated that the requirement for specific EMPs will be secured via planning condition.

Event Gallery (Sui Generis)

4.60 As part of the development it is proposed to provide an 800 person basement 'Event Gallery'. The venue space has been designed as flexible, allowing it to be

used for intimate gigs or small conferences, as well as fashion shows or product launches. An example of different layouts for different events is provided at **Appendix One**.

- 4.61 It is noted that, prior to the Crossrail works, a music club of 1,853 sqm (GEA) existed on the application site. This venue has been lost as a result of the Crossrail construction works, as has the 2000 capacity Astoria formally located to the west of Charing Cross Road within the City of Westminster. Whilst it is noted that a 300 seat theatre has recently been approved within the Derwent London scheme, there is still a huge shortfall in venue space when compared with the pre-Crossrail situation and the basement Event Gallery is being progressed in this context.
- 4.62 Para 5.20 of the Denmark Place Planning Brief notes the sites long association with the popular music industry and the appropriateness of retaining and expanding these activities in this location. It states that more emphasis should be placed on providing small live venues comparable to the existing 12 Bar Club on Denmark Place and that a variety of such establishments could attract a diverse clientele who have a stake in protecting the area.
- 4.63 The basement events space, whilst defined as *Sui Generis*, is similar in its proposed uses to Use Class D2 Assembly and Leisure. Policies CS10 and DP15 are thus considered to be relevant. Paragraph 15.9 of DP15 notes the contribution to the quality of life and to Camden's cultural character made by leisure facilities whilst paragraph 15.11 specifically notes Central London to be an appropriate location for leisure uses, particularly those that may attract large numbers of people, as they can be easily reached by a range of means of transport. It is noted that the Council's Arts and Tourism Team have stated verbal support for the provision of a new venue in this location, noting that the Camden Centre (the only comparable events space in the vicinity) operates over capacity and that there is a notable shortage of alternative venue space for the proposed uses in the surrounding area.
- 4.64 It is noted at paragraph 12.10 of the Development Policies document that the Council wishes to see a wide range of entertainment uses within its centres, not just those that primarily involve drinking, and will encourage suitable uses that contribute towards this. In this context the proposed Events Gallery is considered wholly appropriate for this site.

Suggested Controls

- The basement events space will only be used for live music, community events, exhibitions, product launches, awards ceremonies, conference and fashion shows. It must not be used for any other purposes, including within Class A1, D1 or D3 of the Town and Country Planning (Use Classes) Order (as amended) unless otherwise agreed in writing with the Local Planning Authority.
- No more than 800 visitors will be allowed within the basement event space at any one time without the prior written agreement of the Local Planning Authority.
- The uses hereby permitted shall not be carried out except between 0900 hours and 2330 hours Monday to Thursday, 0900 hours and midnight Friday and Saturday and 0900 hours and 2230 hours Sunday unless otherwise agreed in writing by the Local Planning Authority.
- An updated events timetable shall be submitted to the Local Planning Authority every four months to include details of scheduled events.
- All servicing must take place from designated service bays on Denmark Street and must take place between 0700 and 2200 hours.
- The basement events space must be operated in accordance with the approved Venue Management Plan at all times.
- Meeting facilities within the basement events space will be made available to community groups at a discounted rate

Hotel (Use Class C1) and Tourism Uses

- 4.65 A 28 bedroom boutique hotel to be accessed from Denmark Place is provided as part of the development proposals. The hotel will be a complementary offer to the wider development proposals and will contribute to the attraction of London as a visitor attraction on the world stage, something which is as a key objective of the Mayor.
- 4.66 The London Plan seeks to promote the diverse opportunities to enjoy London through its culture, shopping, sport, tourism and open spaces. Through its policies, the Mayor seeks to enhance London's standing as a centre of culture, relaxation and innovation, both to residents and visitors from within the UK and abroad. The London Plan identifies a number of Strategic Cultural Areas, including the West

End / Soho / Covent Garden area, which it will seek to identify, promote and enhance. Any redevelopment proposals within these areas should follow the design principles set out within the Plan.

4.67 The Plan also makes reference to the Mayor's Cultural Strategy, stating that the Mayor will promote London's cultural and arts facilities as visitor attractions and foster their contribution to both local regeneration and London's global economic offer.

4.68 The Mayor's Tourism Vision 2006 – 2016 seeks to ensure that London expands as a global tourism destination, developing a broader visitor base and spreading the benefits of tourism throughout the capital. Supporting this, the Mayor in conjunction with the LDA has produced The London Tourism Action Plan 2009-2013. The key themes of the Action Plan are:

- A Global City
- A high quality visitor experience
- A sustainable and inclusive city
- Professionalism at every level
- Industry support and partnership

4.69 London's visitor economy is seen as a key driver of London's economy. In 2008, London attracted nearly 15 million staying overseas visits and over 11 million staying domestic visitors. In addition, the LDA estimates that around 200 million tourist day visits are made to and within the capital for, amongst other attractions, the shopping, art exhibitions, theatre and historic sites. Tourism helps to support 253,000 jobs and results in £22 billion of visitor expenditure in the city. Although much of the capital's tourism activity happens in inner London, it has significant impact on the city as a whole.

4.70 Whilst there has been a steady decline in international visitors to the UK since the global downturn began in late 2008, London's visitor economy is perceived as having a key role to play in helping London's wider economy emerge from this. It is recognised that tourism provides local jobs with transferable skills, including thousands of entry level jobs for those with few qualifications.

4.71 It is clear from the wealth of policy documents and initiatives that are in place in London that tourism and the development of facilities and attractions that support this sector are a key driver to the wider economic success of the capital. The

enhancement and promotion of the tourism industry and visitor attractions in London is a key objective for the Mayor, which is backed up by significant planning policy support.

Food, Drink and Entertainment Uses and Approach to Licensing

- 4.72 The development proposals include a mix of Central London uses, including restaurant, bar and basement events space, in addition to retail, hotel, residential and office floorspace. It is therefore relevant that the site sits within the recently expanded Seven Dials Special Policy Area and is covered by 'Planning Guidance for Central London - Food, Drink and Entertainment, Specialist and Retail Uses' (adopted 2007). Recently adopted policies CS9 and DP12 are also relevant in directing the development of town centre uses so that they do not cause harm to the character, function, vitality and viability of an area.
- 4.73 The proposed uses have been located across the development site in recognition of this overarching policy context, with the proposed A4 floorspace being sandwiched between the A3 uses within the smaller of the new buildings in order to allow maximum management of the use. The proposed restaurant uses are similarly located to allow control over access and egress and the client is initially seeking to operate these elements within Camden's Framework Hours in order to pre-empt any concerns relating to the possibility of harm to residential amenity as a result of the proposals.
- 4.74 The entrance to the Event Gallery is from within the development site, allowing the careful control of people movements in to and out of the space. Again the developer is seeking to operate this space within Camden's Framework Hours to ensure appropriate management of the area. A Venue Management Plan (VMP), covering the operation of the Urban Gallery and Event Gallery has been prepared and submitted as part of this application and it is expected that activity specific Event Management Plans (EMPs) will be secured by s106 agreement as part of any approval.
- 4.75 As noted at paragraph 4.73 the development site lies within the Seven Dials Special Policy Area and, whilst the LPA appreciate that planning and licensing regimes are separate, there is a requirement to address the approach that will be taken in regards to licensing as part of any formal planning submission. Accordingly the project team have met with Vicky Wallas of the Council's licensing department and have subsequently appointed specialist licensing solicitors Poppleston Allen to prepare a detailed licensing strategy which is submitted alongside the application.

- 4.76 In terms of policy support for the A3 and A4 uses it is noted that paragraph 5.18 of the adopted Planning Brief supports the provision of food and drink uses in appropriate locations throughout the site and particularly on the Andrew Borden street frontage, overlooking the Plaza.
- 4.77 Within this policy context the proposed food, drink and entertainment uses are considered to be supportable.

Housing

- 4.78 Policy DP1 requires a mix of uses in development, including a contribution towards the supply of housing. In the Central London Area, where more than 200 sqm (gross) additional floorspace is provided, 50% of the proposed increase in commercial floorspace should be provided as residential.
- 4.79 It has been agreed with Camden officers (LPA correspondence dated 10th August 2012 attached at **Appendix Two**) that the baseline for assessment against policy DP1 is the combined commercial floorspace of those buildings already demolished by Crossrail (4,606 sqm GEA) and those that still exist on the site (10,455 sqm GEA), giving a total commercial floorspace of 15,061 sqm GEA. The proposed development will provide a total of 16,914 sqm GEA of commercial floorspace (including 1889 sqm of plant space), equating to an increase of 1853 sqm GEA. In order to comply with policy DP1 the scheme is required to provide an equivalent amount of residential floorspace. Accordingly 2016 sqm GEA of residential floorspace is provided, 1059 sqm GEA (53%) of which is provided as affordable.
- 4.80 Policy DP2 identifies housing as the priority land use of the LDF and notes that the Council will make housing its top priority when considering the future of unused and underused land and buildings. This is supported by Camden Planning Guidance 2: Housing (CPG) which states that the LDF will seek to make full use of Camden's capacity for housing to establish a plentiful supply and broad range of homes.
- 4.81 Within this policy context it is considered that the principle of increased residential floorspace across Denmark Street and Endell Street is fully supportable, subject to the case for the loss of the office floorspace being accepted.

Housing Mix

- 4.82 The proposed development will provide a total of 35 residential units in a mix of studio, 1, 2 and 3 bed units. 28 of the units are to be located within Denmark

Street, with 7 affordable rent units provided as a standalone development at 71 Endell Street.

4.83 The existing and proposed unit mix is detailed in Table 4.2 below:

Table 4.2 Existing and Proposed Residential Mix

	Studio	1 bed	2 bed	3 bed	Total
Existing	15	11	2	-	28
Proposed	2	14	15	4	35
Variance	-13	+3	+13	+4	+7

4.84 It is apparent from the table that, despite the significant increase in residential floorspace on Denmark Street, there will only be a gain of one residential unit within the main body of the site. At present many of the residential units are sub-standard and are not capable of being brought up to modern living standards due to restrictions of the buildings within which they sit. This is particularly true of the properties within York and Clifton Mansions. The poor quality of accommodation is recognised by the Denmark Place Planning Brief which notes at paragraph 4.3 that many of the residential units on the northern part of the site are vacant and of poor quality and so make an inadequate contribution to the borough's housing stock.

4.85 The development proposals offer the opportunity of providing greatly improved residential floorspace in a mix of unit sizes which better meets the housing demand of the area whilst also meeting Camden's space standards. The significant reduction in the number of studio flats and the corresponding increase in 1, 2 and 3 bedroom flats is considered to be a major benefit of the proposals, facilitated by the change of use of B1 space across Denmark Street and 71 Endell Street.

Amenity Space

As part of the development a residential terrace of 213 sqm is proposed to the top of the new build block to the south of Denmark Place. Access to the terrace will be made available for residents of the 9 residential units across 21-25 Denmark Street, equating to 24 sqm per unit. Due to the physical restrictions imposed by providing residential accommodation within existing Grade II listed buildings it has not been possible to provide dedicated amenity space for the units to the south of

Denmark Street. Notwithstanding this it is noted that the existing residential units do not benefit from amenity space and the proposals therefore represent an overall increase in provision.

Affordable Housing

- 4.86 Policy 3.12 of the London Plan states that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes and notes that negotiations in respect of affordable housing should take account of their individual circumstances, including development viability.
- 4.87 Core Strategy policy CS6 expects all developments with a capacity to provide 10 units or more (or 1000 sqm or more) to make a contribution to affordable housing. Policy DP3 states that the Council will negotiate the development of individual sites to seek the maximum reasonable amount of affordable housing on the basis of an affordable housing target of 50% of the total addition to housing floorspace. The Council will expect the affordable housing contribution to be made on site, but where this cannot practically be achieved on site, policy DP3 acknowledges that off-site affordable housing may be accepted.
- 4.88 The development proposals provide an increase of 2016 sqm GEA of residential floorspace. Of this floorspace 1059 sqm GEA is provided as affordable, equating to 53%. The affordable housing provision is thus in excess of that required by planning policy.
- 4.89 Seven of the affordable housing units (814 sqm GEA) will be provided as a standalone development at 71 Endell Street, which lies in close proximity to the site and within the same ward of the borough. As noted above the Council will normally expect on-site contributions to affordable housing, however paragraph 3.13 of Policy DP3 does accept that off-site solutions will be necessary where it is not practical to include affordable housing within a market housing development, for example where the development is relatively small (up to 3,500 sqm gross). It is also accepted that a mix of on-site and off-site contributions may sometimes be appropriate, for example if it is practical to include intermediate affordable housing or social rent housing within the development, but not to include both.
- 4.90 It is noted that the proposed development provides an additional 1202 sqm GEA of residential floorspace on Denmark Street, which is considered relatively small in the context of the supporting text of policy DP3 outlined above. Of this 1202 sqm GEA, 245 sqm is provided to accommodate 4 shared ownership units within 10

Denmark Street. As a result the ability to provide an additional tenure within the floorspace – which is distributed across a number historic buildings, eight of which are Grade II listed – is severely limited. In particular the practicalities of affordable rented units sharing the same stair access as market housing is an issue, with the resulting higher costs and maintenance requirements, and the legal provisions that prevent a different service charge between market housing and affordable housing, being of key concern.

4.91 71 Endell Street is already within the applicant's ownership and lies within the same ward as the main development site at St Giles Circus, being about 250m apart. It is proposed to convert the existing buildings at 71 Endell Street to provide 7 no. rented units for affordable housing. As the property is already in the ownership of the applicant delivery can be guaranteed and it is accepted that the delivery of this element of the affordable housing will be tied to the development of the main site.

4.92 The mix of units provided at 71 Endell Street is proposed as follows:

Unit Type	sqm (per unit)	No. of Type	% of units	No. of Hab Rms	% of Hab Rms
1 bed, 2 person flats	50-54	2	28.6%	4	19.0%
2 bed, 3 person flats	65-66	2	42.9%	6	42.9%
2 bed, 4 person flats	85	1		3	
3 bed, 4/5 person flat	94	1	28.6%	4	38.1%
3 bed, 6 person flat	121	1		4	
Total		7	100%	21	100%

4.93 In order to assess the acceptability of the units provided at 71 Endell Street GL Hearn have been appointed to advice on the proposals and speak with various local Registered Providers (RPs) who develop in Camden including Viridian Housing, Peabody, Network Housing Group, A2Dominion Housing Group and One Housing Group. Network have confirmed that the scheme is too small for them to consider at the current time, however the other RPs contacted have confirmed their interest in advancing discussions with the Applicant.

4.94 In particular the ability to have a separate rented building on Endell Street is seen as a benefit by the RPS, enabling them to manage the property efficiently, especially with regard to service charges. Service charges on the main site are

likely to be high given the nature of the buildings with numerous shared cores, insurance costs and the aspirations of private buyers in this location.

- 4.95 In addition to the Endell Street rented building it is proposed to include 4 shared ownership units within the private element of the buildings on Denmark Street. The shared ownership mix will be as follows:-

Unit Type	No. of Type	% of units	No. of Hab Rms	% of Hab Rms
1 bed, 1 person flat	1	25%	1	20%
1 bed, 2 person flats	3	75%	6	80%
Total	4	100%	7	100%

- 4.96 GL Hearn have had informal discussions with Deborah Halling in LB Camden's Housing Department (October 2012). Deborah confirmed that in high value, central locations rented units were the priority affordable housing tenure. Nevertheless the Applicant has sought to provide on-site affordable housing in the form of some intermediate accommodation. This has been focused on smaller units which are more affordable.
- 4.97 In this context the proposed quantum of affordable housing floorspace (53% GEA) split between off site and on site contributions is considered to be fully compliant with planning policy, providing a high quality affordable housing development at 71 Endell Street and four shared ownership units within 10 Denmark Street.

Wheelchair Housing and Lifetime Homes

- 4.98 The proposed residential units have been designed to meet the requirements of Lifetime Homes wherever the existing built fabric allows.
- 4.99 Due to the restrictions imposed by the change of use of historic buildings, 8 of which are listed, no wheelchair housing can be accommodated within Denmark Street, however the affordable housing development at 71 Endell Street provides one fully accessible wheelchair unit.

Townscape and Design

Design Rationale

- 4.100 The area around St Giles Circus is undergoing considerable change with new opportunities for major redevelopment stemming from works to deliver the Tottenham Court Road LUL upgrade and new Crossrail station. As recognised by the emerging Site Allocation document the works have significantly affected the wider area in terms of construction activity and related traffic changes, however the works also offer an unprecedented opportunity to reconsider the way the area works and to provide significant improvements to public realm and pedestrian permeability as new development comes forward.
- 4.101 Notwithstanding this the position of the development site is particularly complex as it addresses a diverse range of conditions, ranging from the historic buildings on Denmark Street to the new station entrances and planned spaces to the north of Andrew Borde Street, as well as the setting of Centre Point and the scale and building line of the historic St Giles High Street. On the western edge the site must address the more commercial frontage of Charing Cross Road as well as the new developments proposed beyond, resulting in a wide range of complexities and sensitivities to be considered.
- 4.102 The proposals have evolved in response to the surrounding conditions to include the provision of two new primary street buildings (5 storeys and 7 storeys respectively) on St Giles High Street, Andrew Borde Street and Charing Cross Road, plus a smaller building (4 storeys) on Denmark Place to provide a mix of retail, hotel and restaurant/bar use as appropriate to this Central London location. Tapping into the music heritage of the area the proposals include a flexible basement event space, to be accessed via Denmark Place. In addition to the built environment the proposals incorporate new pedestrian routes through the site, encouraging people away from the exit of Tottenham Court Road and ensuring appropriate dispersal through the local area.
- 4.103 Central to the development proposals is the new 'urban gallery' which will provide publically accessible space to assist in accommodating the predicted increase in footfall following the completion of Crossrail. The 'urban gallery' will be a carefully curated space, providing a mixture of virtual retail opportunities within a managed digital environment.
- 4.104 A full description of the proposals and design evolution is contained within the ORMS Architects Design and Access Statement. An assessment of the

development impact is included within the Townscape and Visual Amenity chapter of the Environmental Statement (Chapter 7).

Public Realm and Pedestrian Routes

4.105 As a result of Crossrail and the station upgrade works at Tottenham Court Road there is an anticipated rise in pedestrian numbers from 30 million in 2009 to 56 million in 2018. In this context the requirement for improved public realm and pedestrian permeability becomes vital for the success of the St Giles area moving forward. In recognition of this the St Giles/Tottenham Court Road Urban Realm Steering Group was set up in 2009 including representatives from Crossrail, LUL, Camden, City of Westminster, London Buses, Transport for London and Design for London. The Steering Group commissioned Gillespies and Halcrow to produce public realm and highways proposals for the area intended to establish a new high quality public realm. A key objective of the study was to develop an integrated public realm that provides for an inclusive, high quality and legible environment, which improves connections to destinations and attractions in the area, and reflects this area as an important gateway to the West End.

4.106 The report considers a number of possible improvements that could be made to rebalance the focus between vehicles and pedestrians:

- Creation of a new public plaza at the base of Centre Point, encompassing the new station entrances and extending into a newly pedestrianised St Giles High Street;
- A sensitive and sympathetic design for Denmark Street, which complements the historic character of its buildings;
- Remove traffic from St Giles High Street, rationalise traffic movement at St Giles Circus junction and other potential reconfiguration proposals for surrounding roads
- Re-provision of bus stands at St Giles High Street (lower) and Earnshaw Street to remove buses from the proposed public space.

4.107 The full scope of these proposals is dependent on implementing a wider Tottenham Court Road 2-way project and it is understood that funding has been secured from TfL for further analysis of the proposals. In this context the importance of designing a scheme for St Giles Circus which responds successfully to the current traffic layout, whilst also supporting the successful implementation of the wider public realm proposals, is paramount.

- 4.108 The design rationale for the development has evolved in this context, seeking to address the predicted increase in pedestrian flows through the careful development of an 'openable' building whilst also ensuring that ground floor uses are active and reach out into the new space, as required by paragraph 7.14 of the Denmark Place Planning Brief.
- 4.109 To further establish permeability across the site the ground figure plan has evolved to incorporate a new link to Denmark Street via Denmark Place, the provision of which is encouraged within the emerging Site Allocation document for St Giles Circus. It is anticipated that the proposed pedestrian route will assist in linking the site to the existing and emerging urban pattern in the local area, whilst establishing permeability across the site.
- 4.110 Due to the extent of the applicant's land ownership it has been possible to propose further physical improvements along Denmark Street as part of the application, and the proposed change of use at 4 Flitcroft Street enables specific improvements to the setting of St Giles Church whilst improving an important pedestrian route between Bloomsbury and Soho, which is notably underused outside of daylight hours.
- 4.111 In this context it is considered that the development will make a notable contribution to the wider area by resolving the dysfunctional lack of connectivity between Bloomsbury, Covent Garden and Soho through the creation of a place of character with improved movement and connections between people and places, whilst providing an urban environment which is distinctive, safe and of a human scale (Denmark Place Planning Brief 2004).

Denmark Place

- 4.112 As part of the development it is proposed to reinforce the historic line of Denmark Place through the ground figure plan of two new buildings. The introduction of a new route from Andrew Borde Street to Denmark Street via a new arcade cut through 20 Denmark Street will serve to encourage pedestrians into and through Denmark Place, rejuvenating its purpose as a route through the site.
- 4.113 It is proposed to rebuild the existing buildings at 18 to 21 Denmark Place to accommodate the entrance to the Event Gallery at ground floor level, and hotel accommodation above in line with paragraph 7.21 of the Denmark Place Planning Brief which states that public surveillance and self-policing should be a primary aim of development.

- 4.114 A key objective for Denmark Place has been the introduction of an interesting and vibrant streetscape with active ground floor uses to encourage vitality after dark and to improve the attractiveness of existing pedestrian routes. Historically Denmark Place was notorious for crime, drug dealing, street drug use and anti-social behaviour and as a result the applicant has worked closely with the police to gate the access which has seen some level of improvement. The aspiration for Denmark Place is to build on these improvements to provide an attractive, active, safe and secure environment which encourages pedestrian movement into and through the site, contributing to natural surveillance of the area through careful urban design.
- 4.115 To ensure the proposals address the issues of crime and anti-social behaviour the development has been designed to take account of Secured by Design guidelines and Safer Places guidelines, further details of which are provided within the Design and Access Statement.

Refurbishment within Denmark Street

Listed Buildings

- 4.116 As part of the development it is proposed to refurbish the existing listed buildings to the north and south of Denmark Street in order to re-use and improve the existing fabric. Accordingly individual listed building consent applications are submitted in respect of the following buildings:
- 6, 7, 9, 10, 20, 26 and 27 Denmark Street;
 - 59 St Giles High Street.
- 4.117 Heritage asset proformas contained within the accompany Heritage Statement show that there is great variety across the listed buildings, with diversity of fixtures and fittings and varying degrees of survival. The buildings have been subject to many years of alteration through additions and accretions, including the installation of surface mounted services.
- 4.118 As set out in each individual Listed Building Design and Access Statement there will be a holistic strategy for dealing with the servicing of each building in order to sustain the significance of the listed building. These alterations will better reveal the significance of the heritage asset and will be a significant benefit to the listed buildings.

- 4.119 Where existing windows are found not to be original or appropriate to the significance of the building they will be replaced. Replacement windows will be of a six pane sash pattern detailed as appropriate to the age of the building. Significant numbers of windows have been unsympathetically replaced and in some instances window vents have been added. This reversal will better reveal the significance of the listed buildings, whilst also improving their environmental performance.
- 4.120 It is noted that 26 Denmark Place is on English Heritage's Heritage at Risk Register, having been identified as a building in poor condition and noted as being in 'slow decay, with no solution agreed'. These proposals seek to reverse that decay, addressing the condition of the building and bringing it back into a use that will sustain its significance.
- 4.121 The general approach is one of reversal of the many years of insensitive additions and accretions, in accordance with paragraph 7.7 of the Denmark Place Planning Brief which notes that sensitive refurbishment of Denmark Street will be an important component of any planning application for the development of the site.

Roof Top Additions

- 4.122 As part of the proposals residential accommodation will be added to the roofs of 21-25 Denmark Street. The proposed accommodation will replace the existing amalgam of structures on these buildings, which currently include lift overruns and plant rooms. These structures will be removed and replaced with new single story structures which will provide a significant improvement to the roofline of the properties whilst maintaining the varied roof line and vitality of the area.
- 4.123 The Denmark Street Conservation Area Statement includes policies on roof alterations and additions, and states that they are unlikely to be acceptable where a building forms part of a complete terrace or group of buildings which have a roof line which is largely unimpaired by alterations or extensions or where its architectural style would be undermined by any addition. It is noted that 21-25 Denmark Street do not form a complete terrace. The northern side of the street has been subject to significant change, with the redevelopment of a number of the properties, including nos. 21 and 23-25 by J Fryer in the 1920s. Whilst they form an indiscrete group, the existing buildings are characterised as already having mansard extensions, as well as roof top accretions (lift and stair overruns) which are visible from street level. There is a strong and well defined parapet to the buildings which will not be affected by the development proposals.

4.124 The Townscape and Visual Impact Assessment included within the accompanying ES Main Report includes a view from St Giles Churchyard (View 5) and the junction of Earnshaw Street and St Giles High Street (View 6) in which the new accommodation can be seen. These images show that the new rooftop structures will be largely hidden due to interposing development and the tight knit nature of the urban fabric which results in oblique view only, and the character and appearance of these buildings will be fully preserved with the roof top additions.

A New Arcade

4.125 A new arcade will be formed through the ground floor of 20 Denmark Street to facilitate the provision of a new pedestrian route to/from Andrew Borde Street via Denmark Place, as sought by the emerging Site Allocation for St Giles Circus.

4.126 The new arcade will remove a modern shopfront whilst retaining the art deco 'fanlight' above to ensure the vibrancy of the building is preserved. The new arcade will make a significant improvement to the legibility of the area, allowing direct access to Denmark Place and the new Crossrail station entrances beyond.

4.127 The new arcade will also allow longer views of nos. 6 and 7 Denmark Street, both of which are Grade II listed buildings being refurbished as part of the application proposals. The introduction of a new view will allow their special interest to be appreciated from a new perspective.

Demolition of Unlisted Buildings in the Conservation Area

York and Clifton Mansions

4.128 York and Clifton Mansions are considered by the LPA to make a positive contribution to the character and appearance of the Denmark Street Conservation Area by virtue of their street elevation. This is a view supported by the Denmark Place Planning brief which states a presumption for the retention of York and Clifton Mansions, if their physical condition allows.

4.129 The buildings are currently in ground floor A1 and A3 use with poor quality residential floorspace above. The rear of the mansion block is a secondary elevation which has been subject to significant alteration with the insertion of uPVC windows, and poorly pointed brickwork which shows significant deterioration. The long term future of the floorspace in its current form is therefore questioned.

- 4.130 It is proposed to retain the most significant element of the building – the façade – and to demolish the fabric behind. A new building will be constructed behind the retained façade which will lend itself more readily to modern uses and the residential floorspace will be relocated to Denmark Street. The façade will also be cleaned and restored, to better reveal its significance as a heritage asset.
- 4.131 The new rear elevation of the building facing onto Denmark Place is broken down to form three ‘bay’s to reflect the existing grain of development and character of the area. The elevation is further articulated by a series of window reveals which reflect the existing rear elevation and to provide a sense of overlooking and activity. The design is informed by the existing building and is considered to maintain the historic character of Denmark place and this part of the Conservation Area.

1-6 Denmark Street

- 4.132 The application site falls within the Tottenham Court Road Opportunity Area which identifies and promotes the site and surrounding area as being capable of accommodating substantial development to provide new jobs or homes. The London Plan notes that these areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density, both of which apply to the application site. It is also identified within Camden’s Core Strategy at Policy CS2 as lying within a Growth Area, with an expectation that site opportunities will be maximised.
- 4.133 More specifically the site falls within Site 16: St Giles Circus as identified in the Council’s Site Allocations LDF document. The Site Allocation notes the major development opportunity being to the north of Denmark Place and clearly states that the redevelopment of this site, once the Crossrail project is complete, will be crucial to the success of the wider area.
- 4.134 In order to facilitate the wider development of the area it is proposed to demolish 1-6 Denmark Street. As detailed in the accompany Heritage Assessment these buildings are fragmentary and have been subject to significant change. There has also been a significant change to their setting with the demolition of surrounding buildings to facilitate the construction of Crossrail.
- 4.135 Within the accompanying Design and Access Statement ORMS architects have provided an issues and options appraisal which outlines the steps undertaken in considering whether it is possible to retain these buildings. This identifies the design rationale of the application proposals and considers whether these could be realised through the retention or part retention of the existing building.

- 4.136 The study concludes that the retention of some or all of 1 -6 Denmark Street would preclude the wider redevelopment of this important gateway site, and would work against the wider policy aspirations for the area as a whole. Conversely the introduction of an appropriate mix of uses, facilitation of excellent public realm, new pedestrian routes and development of the highest quality are clearly to the wider public benefit.
- 4.137 It is noted that the buildings have been significantly altered with the reconstruction of the roof, the replacement of slate tiles with concrete tiles and the insertion of steelwork. The properties have been amalgamated to form one building and the original internal divisions between buildings have been blurred through unsympathetic alteration.
- 4.138 It is proposed to redevelop the land to the north of Denmark Place with two mixed use buildings. The proposed building respects the small scale nature of development associated with Denmark place and will significant improve the character of the area through the strengthening of the historic building line of Denmark Place which has been eroded by Crossrail demolition works. This will better reveal the significance of the Denmark Street Conservation Area and enhance the townscape of the surrounding area.

18-21 Denmark Place

- 4.139 It is proposed to demolish 18-21 Denmark Place with the replacement facades being a facsimile of the originals to accommodate the entrance to the Event Gallery and hotel accommodation above.
- 4.140 The properties are not considered by Camden to make a positive contribution to the Conservation Area and no objection has been raised to their proposed demolition and rebuild.

Assessment against the NPPF

- 4.141 A full assessment of the proposals against the NPPF is provided within the accompanying Heritage Assessment and summarised in the following section of this report.
- 4.142 The key NPPF considerations are:
- Local Planning Authorities should take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable use consistent with their conservation, the positive

contribution that conservation of heritage assets can make to sustainable communities and the desirability of new development making a positive contribution to local character and distinctiveness (paragraph 131);

- Loss of a building which makes a positive contribution to the significance of the Conservation Area should be treated as either substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area (paragraph 138);
- Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 134);
- According to the PPS5 Practice Guide (paragraph 79) potential heritage benefits that could weigh in favour of the proposed scheme could include:
 - It sustains or enhances the significance of a heritage asset and the contribution to its setting
 - Reduces or removes risk to a heritage asset
 - Makes a positive contribution to economic vitality and sustainable communities;
 - It better reveals the significance of a heritage asset
 - Is an appropriate design for its context and makes a positive contribution to the appearance, character, quality, and local distinctiveness of the historic environment.
- Local Planning Authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the heritage assets should be treated favourably (Paragraph 138).

4.143 Pre-application discussions with the LPA have suggested that the demolition of 1-6 Denmark Place and the facade retention scheme for York and Clifton Mansions

may cause harm to the character or appearance of the Denmark Street Conservation Area.

4.144 If it is concluded that the loss of nos. 1 to 6 Denmark Place and/or York and Clifton Mansions causes harm to the character or appearance of the Conservation Area, this harm would be 'less than substantial', as referred to at paragraph 134 of the NPPF. Nos 1 to 6 Denmark Place would be demolished, but the facade of York and Clifton Mansions – the most important element of the building – would be retained. In such cases, paragraph 134 of the NPPF states that such harm should be weighed against the public benefits of the proposal.

4.145 The proposed development would deliver substantial public benefits which would outweigh any perceived harm caused by the demolition of nos. 1 to 6 Denmark Place or the rear of York and Clifton Mansions. The full public benefits to be delivered by these relate directly to the Council's own policy aspirations for the site and include:

- New publically accessible routes through the site to improve permeability across St Giles Circus and throughout the wider area;
- Reinforcement of the area's specialist music heritage through repair and continued use of buildings;
- High quality, high density development appropriate to the sites location within the Tottenham Court Road Opportunity Area in place of a vacant works site;
- The restoration of 26 Denmark Street, which is currently on the Heritage at Risk Register;
- The replacement of non-original windows with six over six pane sash windows;
- The cleaning and refurbishment of buildings to Denmark Street which will enhance the contribution that the buildings make to the character or appearance of the conservation area;
- The cleaning and refurbishment of the elevations facing St Giles High Street will improve the character and appearance of the area;
- The restoration of the urban block, and in particular the historic line of Denmark Place, currently lost due to Crossrail works;
- The refurbishment and restoration of 8 Grade II listed buildings;

- The provision of two new mixed use buildings to provide publically accessible space for the advent of Crossrail.

4.146 In this context the application proposals are considered to accord with NPPF paragraphs 131 and 137. Any perceived harm caused by the demolition of 1 to 6 Denmark Place or the fabric behind the retained facades of York and Clifton Mansions is considered, in NPPF terms, to be less than substantial (paragraph 134) such limited harm will be outweighed by the heritage and other wider planning benefits of the application proposals.

Amenity

Lighting

4.147 Due to the nature of the proposals, and in particular the introduction of two new buildings onto Andrew Borde Street, a detailed assessment of the levels of potential effect of the proposed artificial lighting schemes has been undertaken as part of the submitted Environment Statement.

4.148 The lighting schemes for Denmark Street and 71 Endell Street will be almost identical to their existing situations as the function of the buildings will not significantly change, nor will their facades. The assessment results for these properties remain thus remain equal to the existing baseline.

4.149 Lighting effect analysis has been undertaken on the proposed new buildings, with proposed artificial lighting effects from the surrounding landscape and building developments (which are approved or currently under construction) are also included to form a combined cumulative 'worst case scenario' for the assessment.

4.150 Full details of the assessment are provided in Chapter 8 of the accompanying ES but in summary the combine future calculations indicate a negligible increase of light being distributed across the proposed site, with mitigation measures proposed to further reduce any unwanted light spill.

Sunlight and Daylight

4.151 In accordance with guidance issued by the Building Research Establishment (BRE) the levels of daylight and sunlight received to rooms overlooking the proposed development have been assessed. Full details of the assessment are included at Chapter 9 of the accompanying ES.

- 4.152 The proposed development will have an indiscernible effect on the vast majority of the rooms overlooking the site and there will be no noticeable or material effect on the dwellings within Centre Point House, with all of the 72 windows measured sitting comfortably within the recommendations of the BRE guidelines.
- 4.153 Denmark Place is a very narrow pedestrian alleyway. The consequence of this is that windows overlooking Denmark Place presently receive relatively low levels of natural light under existing conditions and are particularly sensitive to relatively small changes in the height and massing of buildings on the north side of Denmark Place. As a result three north facing bedroom windows within 136 Charing Cross Road will experience a significant loss of daylight as a result of the proposals, and it will not be possible to mitigate against this effect. It is noted that the three windows affected serve bedrooms and the remaining living space within the properties benefit from double aspect windows and views west across Charing Cross Road.

Traffic and Transport

- 4.154 A full Transport Assessment (TA), including a Delivery and Servicing Plan and Framework Travel Plan, has been prepared by Buro Happold in accordance with planning policy and the detailed content has been informed by pre-application discussions with the London Borough of Camden and Transport for London. The TA established the application site as being within a highly accessible location both in terms of public transport and other sustainable modes of travel with a PTAL level of 6b which is the highest score available and forecasts that the operational development will have low additional traffic generation. In addition the proposals provide for improvements to permeability and the public realm with greatly improved conditions for both pedestrians and cyclists
- 4.155 In addition the site will be served by Crossrail when it opens in 2018. This will provide access to Shenfield and Abbey Wood to the east and Heathrow and Maidenhead in the west. There will be 12 trains in each direction during the peak period with a capacity of 1,500 per train, increasing the peak hour capacity of the station by 36,000.

Car Parking

- 4.156 It has been agreed with Camden that, in accordance with LDF policy and CPG7, the development will be car free due to its excellent proximity to public transport and central location. A reduction of pay and display parking is also proposed given the high accessibility of the site and as a measure to discourage travel to the area

by car. Travel plans will be implemented across the site to increase awareness of non-car travel options

Cycle Parking

- 4.157 A total of 228 secure cycle parking will be provided on site for employees, residents and visitors, exceeding policy requirements by 80 spaces.

Coach Parking

- 4.158 As the proposed boutique hotel falls below the threshold for requiring coach parking there are no proposals to provide a coach parking facility on site. If there is an occasion where a coach space is required, this could be dealt with through a pre-booking system and management of delivery activity using the loading bays to 'reserve' on-street space at the appropriate time.

Delivery and Servicing Management

- 4.159 Development Policies policy DP20 deals with servicing and deliveries and states that the Council will expect development that would generate significant movements of goods or materials by road, both during construction and in operation, to be located close to the Transport for London Road Network or other Major Roads, accommodate goods vehicles on site and seek opportunities to minimise disruption for local communities through effective management.
- 4.160 It is proposed that deliveries to the main site would be scheduled as part of a managed approach. Details of how this would be achieved can be found in the draft Delivery and Servicing Management Plan (DSP) which is submitted as part of the TA. Given the number of premises/tenants and discrete addresses within the development, a managed approach to deliveries would be highly beneficial. It is proposed that a detailed scheduling system will be developed by the DSP Coordinator (as part of the on-site management team for the development) to take account of the differing needs of the various tenants/land uses and coordinate activity for maximum efficiency.
- 4.161 The ability to manage/schedule servicing activity also provides the opportunity to alter scheduling of routine activities where special events are planned, for example where an unusual level of pick-up/drop-off activity may be required for VIP visitors or the disabled, or where a coach may need to be accommodated.

Energy and Sustainability

- 4.162 The NPPF sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system. Section 10 of the NPPF identifies the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 4.163 The vision of the London Plan is to ensure London becomes an exemplary sustainable world city whilst allowing London to grow in a responsible and considered socio-economic manner.
- 4.164 Camden Core Strategy policy CS13 advises that the Council will require all developments to take measures to minimise the effects of and adapt to climate change, and this is supported at the more detailed level by policy DP22 which requires sustainable design and construction measures as part of new development.
- 4.165 In order to address this policy position both an Energy Statement and a Sustainability Statement have been prepared by Buro Happold and submitted in support of this planning application.
- 4.166 All buildings have demonstrated compliance with building regulations or refurbishment targets through the adoption of a Lean, Clean, Green hierarchical energy strategy. Even within the refurbished elements of the development where conservation listings and spatial limitations have reduced available options for energy improvement measures, measures have been taken to ensure that all available fabric and system efficiency upgrades are adopted. The application of a 200kWth CHP system to serve the new build elements of the scheme and PV arrays across all buildings further demonstrates the development's commitment to reaching both national and local requirements and targets.

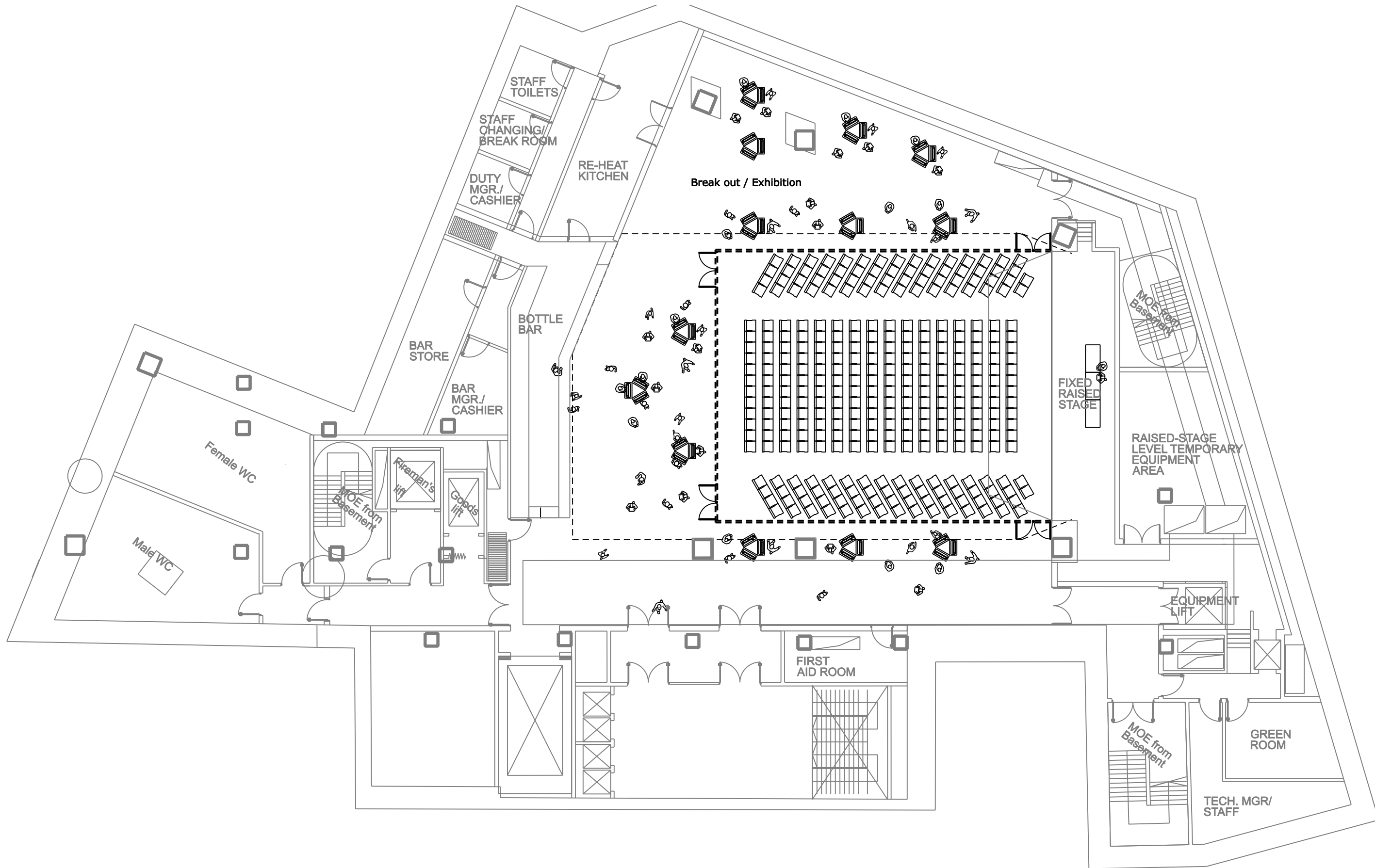
5. Conclusions

- 5.1 Building on the key policy objectives for this site a vision has evolved to create a world class development, taking advantage of the many strengths of the site, namely its accessible Central London location; the music and creative industry links; the historic built fabric, the mix of building styles and heights; and the potential to create strong links to the surrounding area.
- 5.2 The driving objective for this development is the essential need to reinvigorate the music and creative industries and associated retailing that has become synonymous with this part of London. The proposals seek to capitalise on the rare opportunity presented by the advent of Crossrail to provide a visionary sustainable mixed-use development of high quality design in this most central of Central London locations.
- 5.3 This reflects the aspirations of the Tottenham Court Road Station and St Giles High Street Area Planning Framework, the adopted Planning Brief for the site and the emerging LDF Site Allocation by building upon the revival of the St Giles area through the creation of a unique and people-centred place with outstandingly well designed public realm at its heart.
- 5.4 The development has been subject to extensive pre application consultation and an iterative design process, informed both by discussions with the LPA and the production of a comprehensive Environmental Impact Assessment. As illustrated throughout this report, the development has the potential to deliver a broad range of planning benefits in line with the aspirations of adopted and emerging planning policy including:
- Provision of an iconic development in the heart of London, capitalising on the advent of Crossrail and strengthening the rich cultural heritage of the surrounding area;
 - Ability to manage the predicted increase in pedestrian flows as a result of the new Crossrail/LUL station;
 - Third shelf retail opportunities to contribute to the regeneration of the east end of Oxford street and to ensure the on-going relevance of the music heritage of Denmark Street;
 - Contribution towards a new public space at Tottenham Court Road;
 - Provision of active ground floor frontages to contribute to the proposed public spaces and streets;

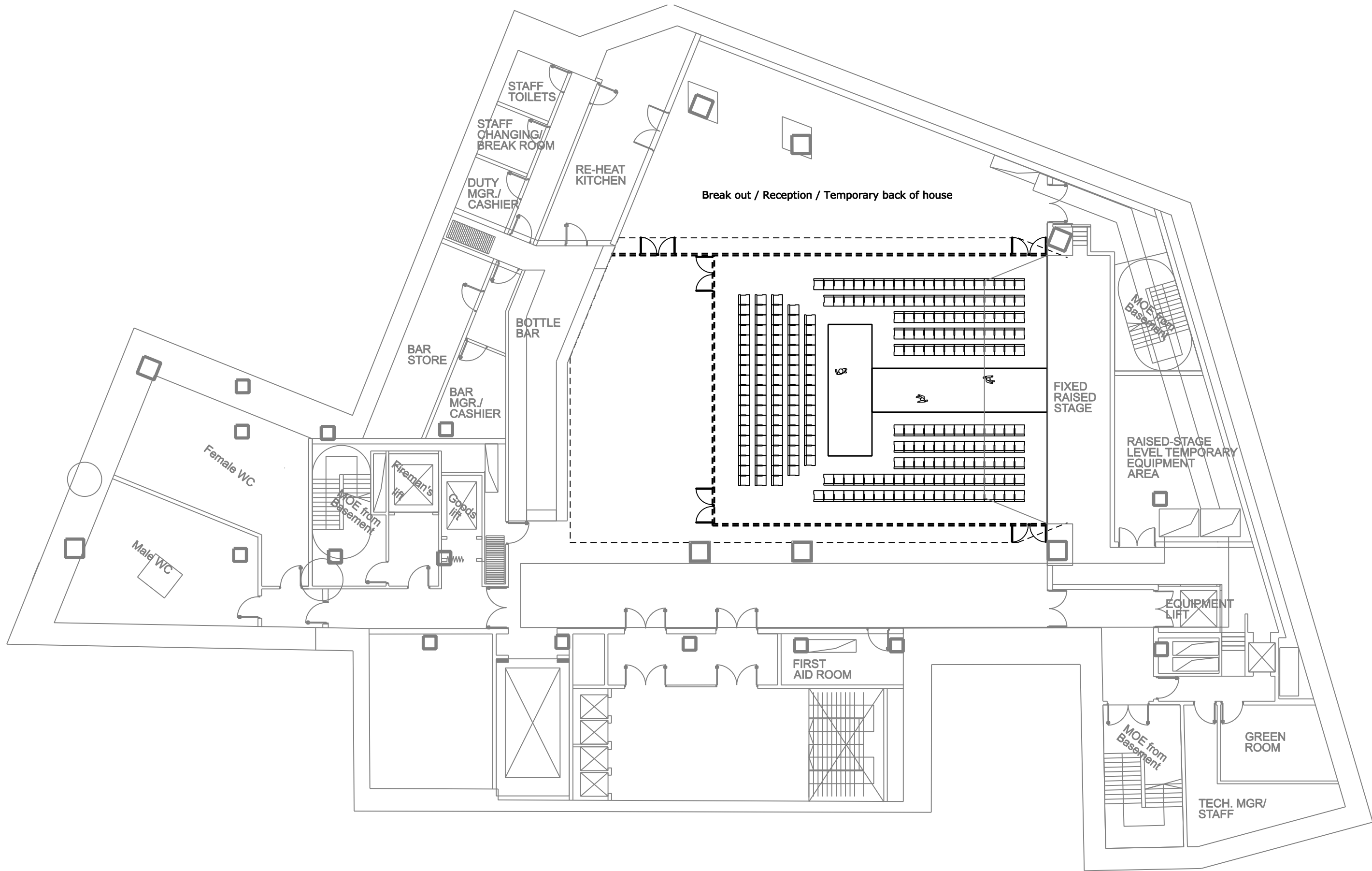
- Provision of a new route through to Denmark Place and Denmark Street beyond to improve pedestrian movements in the area;
- Notable contribution to housing, and affordable housing, as part of this varied mixed use development;
- Protection of the music heritage of Tin Pan Alley through increased control on occupiers within Denmark Street and linkages with the new Urban Gallery and Event Gallery space;
- A sustainable development which will not have any unacceptable impact on the amenity of nearby occupiers.

5.5 In this context it is considered that the development will make a notable contribution to both Camden and to London as a whole by resolving the dysfunctional lack of connectivity between Bloomsbury, Covent Garden and Soho through the creation of a place of character with improved movement and connections between people and places, whilst providing an urban environment which is distinctive, safe and of a human scale (Denmark Place Planning Brief 2004).

Appendix One – Event Gallery Layouts



Project		Drawing Title	
12015 ST GILES		Level G-2 - Large conference	
Drawn	Date	Scale	Size
EG	30/03/2012	1:200	A3
Status	Sketch Number		Rev
PRELIMINARY	12015 - PL - SK - 003		/



Project		Drawing Title	
12015 ST GILES		Level G-2 - Fashion show	
Drawn	Date	Scale	Size
EG	30/03/2012	1:200	A3
Status	Sketch Number		Rev
PRELIMINARY	12015 - PL - SK - 005		/

Appendix Two – LPA Correspondence

Date: 10 August 2012
Our Ref:
Contact: Amanda Peck
Direct Line: 020 7974 5885
Email: Amanda.Peck@camden.gov.uk



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

Tel 020 7974 4444
Fax 020 7974 1975
env.devcon@camden.gov.uk
www.camden.gov.uk/planning

Anna Snow
Turley Associates
By Email

Dear Anna,

Re. Consolidated Developments Ltd, St Giles Circus

Further to my letter of 3 August I am writing to confirm the following.

Uses

Existing uses

I can confirm that the Council will consider the 'existing' uses as being those that are on the site at the moment and those uses that were there prior to demolition (where Crossrail demolition has taken place). It will still also be useful to set out the amount of floorspace which has been subject to demolition as set out in the floorspace schedule dated 18 July 2012.

With regard to the overall loss of B1 floorspace, the planning application will need to be accompanied by justification for this loss taking regard of policies CS8, DP13 and CPG5 (paragraph 6.5). For the floorspace and buildings that remain on site the criteria in these policies and CPG can be used, along with any marketing evidence. For the floorspace which has already been demolished the justification should focus on why B1 uses are not being re-provided in the new buildings and only some of the policy and CPG criteria will be relevant to this.

With regard to the overall loss of A1 floorspace, part of the site is within the Tottenham Court Road Central London frontage. Revised Planning Guidance for Central London: Food, Drink and Entertainment, Specialist and Retail Uses (October 2007) is therefore relevant, along with policy CS7. Whilst policy CS7 refers to shops rather than floorspace, Guidance for Central London states at paragraph 15.5 that planning permission will not be granted for the net loss of retail floorspace where it will damage the character and function of a Central London Frontage. Justification will therefore be needed for any overall loss of retail floorspace.

Please also note that section 14 of the Guidance for Central London states that the Council will not granted planning permission for development involving the loss of retail uses and ground floor and other levels and class B1 uses at upper floors in the protected frontages on Denmark Street. Further information will need to be submitted with regard to the specific existing and B1 and retail floorspace figures on Denmark Street.

Affordable housing

To reiterate the points made in my previous letter. Paragraph 1.12 of policy DP1 and paragraph 3.18 of policy DP3 state that when policy DP1 generates a housing requirement of 1,000sqm of hours or more the affordable housing requirement is 50% as the sliding scale does not apply. Paragraph 3.18 goes

on to state that the Council will take into account other criteria, specifically the economics and financial viability of a development. The current proposals appear to provide 41% of the additional floorspace as affordable housing and this is proposed entirely 'off site'. A financial viability assessment is therefore required to justify the lower percentage of affordable housing and further justification is required as to why the affordable housing is not proposed 'on site'.

Endell Street site

This site is within the Seven Dials Conservation Area, and appears to currently be in office use. Planning permission was granted in 1989 for the change of use of the Endell Street building to 3 x 1 bedroom units (8900244)

The building appears to be 4 storeys in height on the Endell Street elevation with two storeys within a courtyard to the rear. Indicative plans were included in a document dated July 2012 presented at a meeting with Frances Wheat and these show layout proposals at ground floor and first floor levels to the courtyard and at first floor level to Endell Street. Further detail is needed on the proposal for this site because the drawings appear to show new single aspect units to the rear courtyard, which may have levels of daylight/sunlight which do not meet BRE guidelines and which appear to have overlooking issues.

Urban Gallery/basement venue

With regard to the use of the basement venue I understand that the intention is to use the space for a range of uses including exhibitions, conferences, fashion shows, farmers market, motor shows, corporate events, night club and music venue. I also understand that the space could be flexibly used for any one of these uses throughout one day.

With regard to the urban gallery I understand the main use of the space would be as circulation space associated with the digital screen but the intention is also to use the space for a range of uses including corporate events, music venue and screening of programmes/events. Again I understand that the space could be flexibly used for any one of these uses throughout one day.

Each venue appears to include a range of uses in the D1, D2 and sui generis use classes and as such it will be difficult to define the use of each space with reference to just one use class. It will also be difficult to refer to each space as a 'sui generis' use because that will involve describing every possible proposed use within each space.

Can you confirm whether I have included all the potential uses for each venue in my summary above and I will then take further advice on how each space is referred to and classified in any future planning application.

Transport

With regard to the assessment of any advert consent applications and specifically highways safety considerations my colleague Steve Cardno has advised that a road safety audit is likely to be required to examine the impact such a proposal might have on road safety.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held

to prejudice formal determination of any planning application we receive from you on this proposal.

Please note that if you (the applicant or their representative) have drafted any notes of the pre-application meeting(s) held with the council you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

If you have any queries about the above letter or the attached document please do not hesitate to contact **Amanda Peck** on **020 7974 5885**. Thank you for using Camden's pre-application advice service.

Yours sincerely

Amanda Peck

