

62 – 63 Tottenham Court Road & 1 – 7 Goadge Street

Planning Policy Statement

March 2010

INTRODUCTION

This statement is written in support of a planning and conservation area application for development at 62 – 63 Goodge Street and 1 – 7 Goodge Street. The site lies within the Charlotte Street Conservation Area and all buildings, with the exception of 5-7 Goodge Street have been noted within the conservation area statement as positive contributors to the area. Number 1 – 3 has previously been put forward to English Heritage for inclusion on the statutory list however, following detailed investigations English Heritage concluded that the building was not worthy of such inclusion. In addition to being in a conservation area the site also falls within a Central London Frontage (Tottenham Court Road) and Neighbourhood Centre (Goodge Street).

Applications were made 2007 for redevelopment in respect of numbers 61 -63 Tottenham Court Road & 1 – 7 Goodge Street. This application was recommended for approval by officers however overturned at committee and a refusal issued, the application was then dismissed on appeal. The reasons for refusal were the demolition of number 1 – 3 Goodge Street and the scale and design of the proposed corner tower feature as well as the loss of small shop units.

The applicant has considered the comments within the committee reports and the appeal decision and has entered into detailed pre application discussions with officers to resolve this issue. Pre application consultation meetings have also been held with the Charlotte Street Residents Association, Ward Councillors and Local Residents. A statement of community involvement is submitted with the application.

The proposed scheme involves the demolition of internal walls and rear elevation and the conversion of number 62 Tottenham Court Road, the demolition and rebuilding of number 63 Tottenham Court Road, the demolition and rebuilding behind the retained facade of number 1-3 Goodge Street and the erection of a new building at 5-7 Goodge Street. The scheme proposes 500 square metres of retail space and 9 residential units. The residential mix is as follows; 2 x 1 bed, 3 x 2 bed, 4 x 3 bed

The pre application responses received from the Council in respect of these discussions are included at appendix 1 of this statement. The following key points have been established;

- the land uses proposed are acceptable
- the proposed number & size of retail units is acceptable
- the proposed size and mix of residential units proposed better reflect local housing need
- number 63 Tottenham Court Road is of a lesser significance than number 1 – 3 Goodge Street or number 62 Tottenham Court Road; its loss would result in *less than substantial* harm to the conservation area.
- Mansard extension to number 1- 3 Goodge Street is acceptable in principle.
- Proposed new building at 63 Tottenham Court Road should reflect the height of adjacent buildings and be suitably 'dramatic' for this corner site.
- Using the corner site as a focal point is reasonable in design terms
- The proposed building at 5 – 7 Goodge Street is a successful design

PLANNING POLICY CONSIDERATIONS

- **Existing & Proposed Landuse**

The ground floor level of the application site is occupied by the following units;

Address	Use	Use Class
62 Tottenham Court Road	Williams News	A1
63 Tottenham Court Road	Cards Galore	A1
1 – 3 Goodge Street	Samurai Sushi	A1
1 – 5 Goodge Street	Subway	A1

The proposals include the retention of the existing retail floorspace at ground floor level and the provision of additional residential accommodation above. The existing units at 63 Tottenham Court Road and 1 – 3 will be amalgamated and the number of overall retail units reduced from 4 to 3 units as discussed below. The existing units benefit from some basement storage space however this is has low floor to ceiling heights, is damp and generally of poor quality, the proposed scheme will provide decent basement storage space ancillary to the proposed retail units.

In terms of the lawful use of the existing floorspace within the building above ground floor level this is somewhat unclear. Number 62 Tottenham Court Road is currently vacant and has been so since at least 2006. It appears that the last lawful use of this part of the site was as office floorspace. The upper floors of number 63 Tottenham Court Road are used by cards galore as ancillary storage space; these areas suffer from water ingress and are in very poor structural condition. The upper floors of 1 – 3 Goodge Street are also vacant and have been so since at least 2006, the committee report dating from this time describes the upper levels as 'one un-occupied self contained residential unit'.

Policy CS8 acknowledges that the future supply of offices in the borough will meet the current demand and therefore the Council will consider proposals for other uses of older office premises (such as those above 62 Tottenham Court Road) if they involve the provision of permanent housing. In this instance the scheme would result in the loss of old, vacant offices that are no longer suitable for modern day requirements their replacement with permanent residential accommodation.

The 4 existing retail units are in a poor state of repair, have (with the exception of 1 – 3 Goodge Street) unattractive shopfronts and poor internal layouts. Of these 4 units 2 are in use as takeaways serving a variety of hot and cold drinks and food.

Policy CS7 (f & h) notes that the Council will seek to promote successful and vibrant centres by *"providing for and maintaining, a range of shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice"* *"making sure that food, drink and entertainment uses do not have a harmful impact on residents and the local area..."* The application proposes 3 A1/A2 retail units in place of the 4 existing units, 2 of which are food and drink uses.

It is considered that the balance of proposed land use mixes represent those which will, in conjunction with the refurbishment of the facades of 62 Tottenham Court Road and 1 – 3

Goodge Street and the high quality corner building at 63 Tottenham Court Road, contribute significantly to the success and vibrancy of the shopping centre.

The adopted Core Strategy states that the Council will encourage the provision of a mix of uses in suitable locations noting that an appropriate mix of uses can contribute to successfully managing future growth in Camden and making efficient use of its limited land. The proposed land uses have been discussed previously with officers and are considered to represent a suitable mix in this location.

- **Retail Unit Size**

Policy CS7(g) of the adopted Core Strategy notes that the Council will seek to protect and promote small and independent shops and resist the loss of shops where this would cause harm to the character and function of a centre.

Policy DP10 of the adopted development management policies notes that the Council will *encourage* the provision of small shop premises suitable for small and independent businesses (our emphasis).

The current site accommodates 4 small retail units, one of which is 'Subway' an unattractive A1/A5 unit located within 5 – 7 Goodge Street. The proposals as put forward allow for 3 separate retail units, one at number 62 Tottenham Court Road, one at number 63 Tottenham Court Road and 1 – 3 Goodge Street and one at number 5 – 7 Goodge Street. The existing unit at number 62 Tottenham Court Road will be retained and refurbished.

In this instance the loss of one small unit is not considered to be detrimental to the character and function of the shopping centre. The scheme proposes to amalgamate the 'Samurai Sushi' A1/A5 unit at 1 -3 Goodge Street in order to provide a modern and functional unit which links with the corner unit at 63 Tottenham Court Road. The existing shopfront within number 1 -3 Goodge Street will be retained and the visual separation between the new building at 63 Tottenham Court Road and the historic building at 1 – 3 Goodge will be maintained by a substantial 'nib' at ground floor level. The proposed redevelopment of the site and provision of modern and functional floorspace is considered to offer considerable benefits to the vibrancy of this part of Tottenham Court Road, the development overall will enhance the shopping centre and in this respect the proposals fully accord with policies CS7 and DP10.

- **Housing**

Policy CS 6 seeks to maximise the provision of housing in the borough and this application will help the Council achieve this goal. Policy CS6 (k) notes that the Council will seek a range of self contained homes of different sizes to meet the Council's identified dwelling-size priorities. Policy DP5 seeks a mix of dwelling sizes appropriate to the development taking into account the site and the area, aiming for a 40% provision of 2 bedroom homes.

The proposals provide the following mix of residential accommodation;

Number of bedrooms	Total number of units	Percentage
1	2	22%
2	3	33%
3	4	45%
Total	9	100%

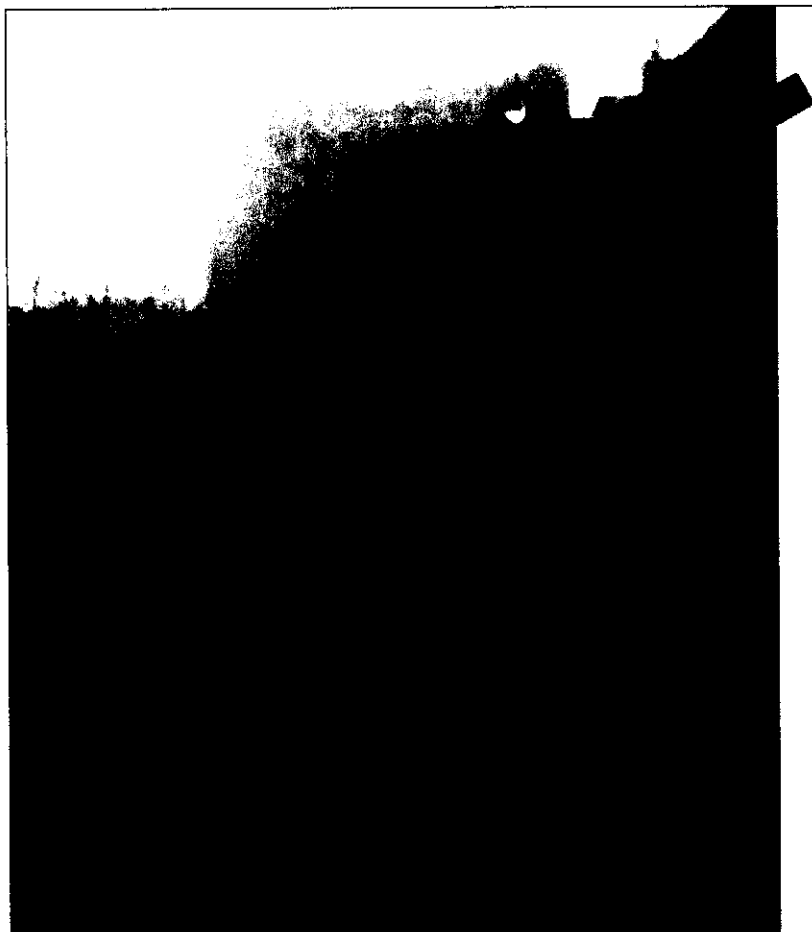
The proposed mix is considered to be in accordance with the Council's aspiration for mixed residential provision and officers have previously stated that *"all the units are dual aspect and would meet Camden's unit size guidance"*. It was agreed by officers that the particular location of the proposals coupled with the evidence on need indicate that the proposed unit sizes and mix could be considered acceptable.

The proposed number of units is below the threshold of 10 and the proposed amount of additional residential floorspace is below the threshold of 1000 square metres, therefore it is agreed that no affordable housing is required.

- **Residential Amenity**

Policy DP26 refers to the impact of development on occupiers and neighbours and also to the standard of new development.

The proposed new buildings will extend to a similar height, bulk and mass as the existing buildings. The nearest residential properties are located at the rear of number 9 Goodge Street. These properties face south towards the office building which occupies number 59 Tottenham Court Road and extends rearwards. The photograph below is taken from the rear of number 62 Oxford Street and shows the residential properties at number 9 Goodge Street on the right hand side as indicated.



The proposed new development extends 5 metres from the existing main rear building line of number 62 Tottenham Court Road. The proposed rear elevations to the new buildings on Goodge Street remain on the same building line as number 9 Goodge Street. There will be obscure views from the proposed terraces which serve the new residential development towards the existing residential accommodation within number 9 Goodge Street however these views will be at an obscure angle and it is not considered that they would give rise to overlooking to the existing neighbouring properties.

The proposed residential units are all dual aspect and, dependent upon whether they are located on the Goodge Street facade or Tottenham Court Road Facade, benefit from North/South daylight/sunlight or East/West daylight/sunlight. All proposed units are above ground floor level and will achieve good levels of internal daylight/sunlight. The proposed external envelope of the new building does not project beyond the existing building line of 9 Goodge Street and will have no impact on the south facing residential units located within this property.

Each proposed residential unit benefits from some form of outdoor amenity space in the form of a terrace or balcony. There will be a minimal level of mutual overlooking between the proposed terraces to flats 6 and 9 on the upper levels however this will be at obscure angles and is considered to be acceptable in this instance.

A detailed noise assessment under PPG24 has been carried out by Hann Tucker and this recommends a design specification in order that the proposed residential units will achieve the required internal noise levels.

All units comply with the lifetime homes criteria and the disabled access requirements are discussed further in the Design and Access Statement.

- **Conservation and Design**

Proposed demolition - 63 Tottenham Court Road:

The building comprises a three storey, early 20th century commercial property with four bays fronting Tottenham Court Road and two bays fronting Goodge Street

Officers noted during previous discussions that the building makes a positive contribution to the conservation area and that its demolition would need to be addressed under policy HE9.1 of PPS 5. Following further pre application discussions officers have noted "it is not considered that this loss (of number 63 Tottenham Court Road) would represent substantial harm to or total loss of significance to the conservation area" (my underlining)¹.

Officers have noted that the proposals must be assessed against policy HE9.4 of PPS 5 and a detailed assessment of the entire application site, its contribution to the significance of the conservation area and the effect of the proposed scheme on this significance has been provided with this application.

This assessment concludes that the existing property at 63 Tottenham Court Road contributes little to the value of the conservation area, it does not evoke Fitzrovia or its history in its form or appearance and, although there are a number of inter-war and post-war building in the conservation area, buildings of the late 20th Century do not form its prevailing character. The building is considered to represent an unremarkable and generic example of the Art Deco Style, its proportions are cluttered and the use of faience is considered to be prosaic and dull.

In terms of the proposed replacement building at number 63 the scheme as originally presented to officers was considered to be 'underwhelming and not of sufficiently high standard for the corner location'. Bearing this criticism in mind the architects have sought to address the corner in a bold and exciting fashion, yet making sure that reference is given to the context of the surrounding conservation area and the retained buildings immediately adjacent to the site. A key issue is the transition from the scale of Goodge Street to the scale of Tottenham Court Road. The proposal gives an honest approach, overlapping elements from each and presents a strong feature to enhance the corner and provide vibrancy to the area.

A further review of the architectural approach to this building is set out within the design and access statement by Rolfe Judd architects and also within the Heritage Statement by KM Heritage.

It is considered that the scheme represents the opportunity to improve this part of the conservation area and to propose a building which really addresses its corner location and rises to the architectural challenge presented.

5 – 7 Goodge Street

This site has suffered from bomb damage and is currently only occupied at ground floor level by an uninspiring shopfront to Subway. Officers have previously commented that a modern approach could work in this location and the replacement building proposed is of a contemporary nature. The architects have sought to address the previous comments regarding floor heights and hierarchy and have placed more emphasis on the traditional rhythm of the terrace with the more contemporary parts of the proposed architecture remaining subordinate to the heavier brick work and traditional fenestration pattern at first, second and third floor levels. As indicated within the introduction officers now support the proposed new building in this location.

Mansard for 1-3 Goodge Street:

Officers have confirmed that this element of the scheme is not objectionable in principle. The applicant has sought to amend the previous drawings to ensure the building no longer appears top heavy and the mansard is now traditionally detailed.

Rear Elevations

The proposed rear elevations of the building have been designed to be subordinate to the front elevation and simple in their design approach. The rear elevations will only be visible from private properties, namely the office building at number 59 Tottenham Court Road, the rear of the properties is not visible from any public vantage point within the conservation area.

Shopfronts:

- 62 Tottenham Court Road & 63 Tottenham Court Road

The proposed shopfronts retain stall risers and are in general conformity with the style and design of shopfronts prevalent on Tottenham Court Road. The existing traditional shopfront at 1-3 Goodge Street is retained and a traditionally detailed shopfront is intended to be inserted into number 5 – 7 Goodge Street.

Overall Design Approach:

Policy DP24 seeks to secure high quality design and notes that proposed buildings should consider the character, setting, context and form of neighbouring buildings as well as the quality of materials to be used. The proposed development is discussed in some detail within the design and access statement provided with the application. The development has been designed to respect the traditional and more modest form of buildings along Goodge Street and also to reflect the more experimental and larger forms of buildings on Tottenham Court Road. The proposed new building at 5 – 7 Goodge Street is a contemporary interpretation of the traditional form prevalent along here. The proposed proportions, solid to void pattern and scale reflect the retained facade of number 1 -3 Goodge Street however the materials are high quality modern and contemporary materials which ensure the building is interpreted as 'of our time' rather than as a pastiche piece of architecture.

The facade of number 1 – 3 Goodge Street is considered to be a positive contributor to the conservation area and therefore is retained. The proposed new corner building at 63 Tottenham Court Road replaces a building which is considered to have 'little significance' in the conservation area, as expanded upon within the report by KM Heritage. The proposed new building intends to 'turn the corner' from the relatively modest scale of Goodge Street to the larger scale of Tottenham Court Road. The new building achieves this by reflecting the traditional materials of number 1 -3 Goodge Street but providing a focal point in the form of the more contemporary glazed fourth floor level.

Transportation

Policy notes that cycle parking should be provide at a ratio of 1 per new residential unit and that car parking should be provided at a maximum of 1 space per unit. The Council will seek to encourage the use of public transport. The application site is located within PTAL 6b as noted at appendix 2 of this document and benefits from extremely good public transport links.

The scheme development proposes storage for a 'Brompton fold up' in each individual flat. The location of the site is such that, with limited footway space and busy footways and carriageways, the installation of cycle parking on the surrounding streets or footways is not a realistic alternative. It is proposed that a management scheme would be implemented with the development scheme which would ensure that the folding cycle is part of the fixtures and fittings of the property, owned by the freeholder, with an obligation on the tenant to keep it properly maintained and covered by a very small element of the service charge. This will ensure that cycle storage is provided in perpetuity.

Environment and Sustainability

Policy DP22 refers to promoting sustainable design and construction and notes that schemes must meet code level 4 of the Code for Sustainable Homes by 2013. The scheme achieves code level 4 for energy and code level 3 in all other respects due to the constraints of the site and the surrounding conservation area. This has been discussed with Camden and is considered to be acceptable in this instance. This is further explored within the Energy Options report by Mendick Waring and submitted with this statement

Appendix 1

Sarah Round

From: Sexton, Gavin [gavin.sexton@camden.gov.uk]
Sent: 23 December 2010 18:08
To: Sarah Round
Subject: RE: 62 - 64 Tottenham Court Road

Dear Sarah

Please find below latest design comments on the amended proposals (12 Nov 2010).

OBSERVATIONS:

Comments based on package with letter dated 7th of October and revised visuals received by e-mail on the 12th of November.

Reference should also be made to previous comments 10 which are still applicable in places.

63 Tottenham Court Road

A draft and incomplete statement is provided which attempts to address the tests within PPS5 regarding demolition. As was stated in previous comments the tests of HE9.4 apply in assessing the demolition of this building. C&UD officers agree with the assessment that the building is of a lesser significance to the others on the site (1-3 Goodge Street or 62 Tottenham Court Road), however it still does make a contribution to the conservation area and its loss would result in (less than substantial) harm to the conservation area.

It needs to be demonstrated why the building is not capable of retention and reuse, possibly with an extension (as shown on 4840/T(20)E02b Rev 2). Lesser significance does apply an assumption that the demolition of the building is automatically acceptable.

The proposed replacement building on this site is highly modern in appearance. Notwithstanding the question of demolition, concerns were made regarding the "underwhelming" nature of the previous proposal. The current proposal is certainly an improvement but still needs further revisions and would need to demonstrate that it is of the highest architectural quality whilst also preserving or enhancing the character and appearance of the conservation area..

Following the meeting a revised scheme was submitted (12th November), these comments are based on this.

The surrounding buildings, and indeed those in the conservation area, are characterised by solid buildings with punched, vertically proportioned, openings. The proposed development is a modern interpretation of this and could work successfully. The façade is clad in an indeterminable material whose colour would be similar to brick and creates long, vertical windows in the facade. In an area where there are a range of building ages this approach could work and could add an extra layer in the development of the area.

However it is not clear from the drawings and plans whether this cladding would be fixed or in the form of some sort of retractable folding screening (as appears on the plans). The cladding should be largely fixed to ensure that the building maintains a largely "solid" appearance.

The design offers the potential for some richness in detail (such as the stone coursing which runs through the Tottenham Court Road elevation) which is encouraged. Additionally the recessed balconies give a sense of depth and interest which is welcomed.

The proposed Tottenham Court Road elevation is largely glazed which is out of character with the area. The only change from the October submission appears to be the colour of the cladding system to match the Goodge Street

elevation. Whilst this provides a more cohesive design there are still concerns that the façade will be too highly glazed and thus out of character with the conservation area.

The "roof" storey (4th) was originally expressed as a double height glazed block. Following concerns expressed in the meeting this has been reduced by in height by approximately 30% in height (it is difficult to tell exactly as only a perspective drawing has been provided). Whilst using the corner site as a focal point is reasonable it does not need to be expressed through extra height. The proposed block-like appearance is bulky and top heavy. Concerns are also raised that the projection into Goodge Street would be obtrusive to the streetscene. The proposed fourth floor should rise no higher than the flanking buildings and should be less dominant.

1-3 Goodge Street

The proposed mansard roof looks a marked improvement over the proposals from the summer. As section drawing would still be useful to assess its profile and internal head height.

5-7 Goodge Street

This is a much more successful design which picks up on the overall hierarchy of floor levels shown and has a fenestration pattern appropriate to the context with two vertical banks of windows.

The detailing of this façade will be extremely important eg the impact of the slit windows would be significantly diminished if thick framing was used. Any application would need to be accompanied with construction details to ensure design quality (eg window framing).

62 Tottenham Court Road

The front elevation is still inaccurate in terms of the roof details. The architect acknowledged this and would update the drawings.

Rear elevations

No information has been provided which makes an assessment of the enlarged rear portion of the buildings not possible.

Shopfronts

See previous comments regarding internal division between 1-3 Goodge Street and 63 Tottenham Court Road.

Air conditioning grilles/louvers should not be placed on the front elevation.

Regards

Gavin Sexton
Senior Planner

Telephone: 020 7974 3231

From: Sarah Round [mailto:sr@londonpp.co.uk]

Sent: 13 December 2010 16:10

To: Wito, Alan

Cc: Sexton, Gavin

Subject: RE: 62 - 64 Tottenham Court Road

Dear Alan,

Thank you for the update. Something as soon as you are able would be much appreciated.

Kind Regards,

Sarah Round
Principal Planner

The London Planning Practice Ltd
61 Chandos Place
Covent Garden
London WC2N 4HG

Di 020 7420 6372
T 020 7557 9990
F 020 7240 6176
M 07500 603283
W www.londonpp.co.uk

The information within this email is intended solely for the stated addressee(s). Access to this email by anyone else is unauthorised. If you are not the intended recipient please note that any disclosure, copying, distribution, or any action taken or omitted to be taken in reliance on the information within this email is unauthorised and may be unlawful. When addressed to a client of The London Planning Practice Ltd any opinions or advice contained in an email are subject to the terms and conditions of our engagement

From: Wito, Alan [mailto:Alan.Wito@Camden.gov.uk]
Sent: 13 December 2010 15:50
To: Sarah Round
Cc: Sexton, Gavin
Subject: RE: 62 - 64 Tottenham Court Road

Dear Sarah

I am afraid Gavin is off sick at the moment. I am aiming to pass through my comments through to him in the next few days so I would imagine that you will hear something by the end of the week.

Regards

Alan Wito
Conservation and Urban Design Officer

Telephone: 020 7974 6392

From: Sarah Round [mailto:sr@londonpp.co.uk]
Sent: 10 December 2010 16:04
To: Sexton, Gavin; Wito, Alan
Cc: David Whittington
Subject: 62 - 64 Tottenham Court Road

Dear Gavin and Alan,

Could I have an urgent update on the above please.

Our client is getting incredibly anxious as your response will inform our application submission and we have reached a stage in preparation where we cannot go much further without this.

Many thanks,

Sarah Round
Principal Planner

The London Planning Practice Ltd
61 Chandos Place
Covent Garden
London WC2N 4HG

Di 020 7420 6372
T 020 7557 9990
F 020 7240 6176
M 07500 603283
W www.londonpp.co.uk

The information within this email is intended solely for the stated addressee(s). Access to this email by anyone else is unauthorised. If you are not the intended recipient please note that any disclosure, copying, distribution, or any action taken or omitted to be taken in reliance on the information within this email is unauthorised and may be unlawful. When addressed to a client of The London Planning Practice Ltd any opinions or advice contained in an email are subject to the terms and conditions of our engagement

This e-mail may contain information which is confidential, legally privileged and/or copyright protected. This e-mail is intended for the addressee only. If you receive this in error, please contact the sender and delete the material from your computer

This e-mail may contain information which is confidential, legally privileged and/or copyright protected. This e-mail is intended for the addressee only. If you receive this in error, please contact the sender and delete the material from your computer

Pre-application meeting report

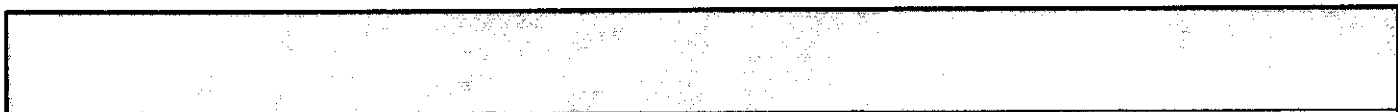
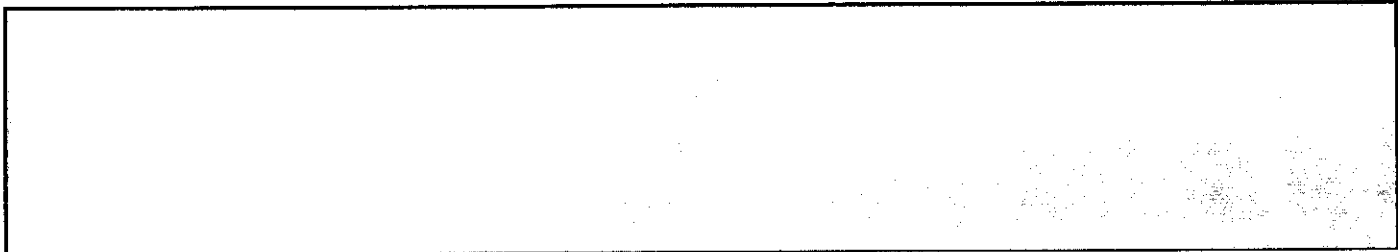
Meeting Date:
12 May 2010



The London Planning Practice
61 Chandos Place
London
WC2N 4HG

62-63 Tottenham Court Road & 1-9 Goadge
Street
London
W1T 2EP

Redevelopment of properties 62-63 Tottenham Court Road, 1-9 Goadge Street to provide for mixed use including 250m2 of retail at ground floor and 9 residential units above across four upper floors.



<p>Background and new policy and guidance</p>	<p>Background This report follows a second meeting on broadly the same site as was discussed on 6 November 2009. The principle changes to the proposals are as follows:</p> <ul style="list-style-type: none">• 61 Tottenham Court road omitted from scheme• 11-13 Goodge Street omitted from scheme• Upper floors now residential from 1st to 4th floors (previously B1 office at 1st floor)• Additional fifth floor above corner unit omitted• Retail units on ground floor are smaller than previous proposal <p>The entire site lies within Charlotte Street Conservation Area on the junction of Tottenham Court Road and Goodge Street. It consists of a number of properties ranging in age and style from the late eighteenth century to early twentieth century.</p> <p>The site in question has a detailed planning history which was discussed in detail in the previous report and is not repeated here.</p> <p>Policy As the draft LDF Core Strategy and Development Policies documents have now been published, they are material planning considerations. However, as a matter of law, limited weight should be attached to them at this stage. The LDF examination in public closed on 2 June 2010 and subject to receipt of some further information from LB Camden the Inspector's report on the soundness of the LDF is expected at the end of August. It is expected that LDF policies will take primary consideration from that point onwards.</p> <p>Scale of development The proposals involve development across in excess of 1000m² and therefore would be categorised as a 'major development', with an associated 13-week statutory decision timescale which includes a 3-week consultation period. In the event that the assessment leads to a recommendation for approval the case would be considered by the Development Control Committee. Any S106 required in order to make the development acceptable would have to be agreed and signed within the 13 week period. No deviation from the 13-week period is possible for major developments. A list of committee dates in 2010 is appended to this report. You are advised to contact the planning department in</p>
--	---

	<p>advance of making the application in order to discuss the timing of the submission.</p>
<p>Land use</p>	<p>The considerations of land use have changed little since the last report. Tottenham Court Road is designated as Central London Frontage in Camden's UDP and has an established grain of retail scale and character often accompanied by office or additional retail on the first floor. Goodge Street on the other hand is within the Charlotte Street Conservation Area and the designated Goodge Street Neighbourhood centre.</p> <p>The distinct characters of TCR and Goodge Street were discussed in the previous report and remain relevant.</p> <p>Tottenham Court Road (TCR) The proposals for no 62 TCR propose the retention of the existing retail unit at ground floor, with the potential insertion of a kiosk (approx 12m²) fronting the street.</p> <p>The proposals would combine the existing units at 63 TCR and 1-3 Goodge street into a larger unit of approx 100m².</p> <p>Planning policy R7 (protection of shopping frontages and local shops) would resist the loss of retail in this location and so the proposals remain in accordance with the aims of that policy.</p> <p>The proposals seek to convert the upper floors to residential with access via a central core entered via a lobby between retail units at 1-3 and 5-7 Goodge Street.</p> <p>The current proposals would not lead to the loss of existing housing.</p> <p>Retail unit size The revised retail layout seeks to address officer's concerns raised previously about retail unit size. The additional retail provision at first floor has been removed and the incorporation of retail at 5-7 Goodge Street into a single unit which also comprises 63 TCR and 1-3 Goodge Street has been dropped. Subject to design considerations (see later section) the proposals are considered to better address the reasons for refusal on previous applications and are more likely to be acceptable.</p> <p>Housing The drawings submitted appear to include the following 9 units from first floor up:</p> <ul style="list-style-type: none"> • One x 2 bed (95m²), one x 2/3 bed (90m²), one x 1bed (48m²) • One x 2 bed (95m²), one x 2/3 bed (90m²), one x 1bed (48m²) • One x 3 bed duplex 143m²), one x 3 bed duplex (135m²), one x 2bed duplex (110m²) <p>The majority (six) of unit sizes are generously sized 2 and 2/3 bed units, with 3 additional one bed units. All are dual aspect and would meet Camden's room and unit size guidance. It is noted that a number of the units have rear</p>

	<p>balconies/decks which is welcome, subject to neighbouring amenity considerations. The units are vertically stacked with the exception of the upper floor of duplex unit 9 which extends above bedrooms in unit 8.</p> <p>The units on the drawings sum to nine, across approx 860m2. Both in number and overall size the development would not trigger the affordable housing threshold (capacity for 10 units, or 1000m2). While Camden would not seek affordable housing in this instance it is noted that the applicant has previously demonstrated a development interest in adjoining properties.</p> <p>As part of an application the Council would seek to secure a clause within the S106 legal agreement setting out that Affordable Housing policy H2 would have to be met in the event of approval for future development (including a change of use to residential) that results in a total of 10 or more units or 1000sqm of residential floorspace across adjoining or related application sites which are within common ownership. Any related financial appraisal accompanying a future application on related sites would need to take account of the value gained from the units gained as part of any current application.</p> <p>As noted previously relevant studies into the housing needs of the borough (Camden Housing Needs Study Update and the London Strategic Housing Market Assessment) identify priority unit sizes for new residential properties. The particular location of the proposals coupled with the evidence on need indicate that the proposed unit sizes and mix better reflect the need than the previous proposals.</p>
<p>Residential and occupier amenity</p>	<p>The ground floor proposals appear to be limited to A1 retail. In the event that A3 (face/restaurant) or A5 (takeaway) uses were proposed the application would need to provide suitable information on related cooking odour control, external plant or fume/extraction units.</p> <p>The details required for such equipment were set out in the previous report.</p> <p>In the event that the residential units included plant such as air source heat pumps or a/c units an acoustic report addressing the impact of the plant noise on residential amenity within and without the development would be required.</p> <p>The previous report omitted to clarify that an acoustic report detailing how the proposals would address PPG24 requirements for residential properties adjacent to the heavily trafficked TCR would be required. The statement should assess the noise exposure category and make recommendations on noise mitigation in order to ensure acceptable resident amenity.</p> <p>Policy H7 seeks for all new residential units to meet lifetime homes standards and in the case of major developments that 10% of the units be suitable for occupation for a person using a wheelchair.</p> <p>Due to the density and constraints of the site a daylight sunlight report would be required at application stage demonstrating, with all calculations clearly set out and fully justified, how the BRE Guidelines are met. All units should be compliant with the BRE Guideline for daylight level by the VSC and ADF methods of</p>

	<p>analysis. The retail units would not be required to be analysed.</p> <p>Any design proposals would need to take account of the privacy and opportunities for overlooking into neighbouring habitable rooms. Screening may be required on balconies or terraces, where provided.</p> <p>The scheme would need to contribute open space, at a target rate of 9m² per occupier. However given the constraints of the site it would be unlikely to meet this target and so a contribution would be sought by S106 in accordance with policy N4 to improve open space within the locality.</p>
<p>Conservation and Design</p>	<p>Of significance to the assessment of future application is the recent issue of PPS 5 – <i>Planning for the Historic Environment</i> which was introduced in March 2010 and supersedes PPG15.</p> <p>Demolition</p> <p>It is still proposed to demolish the corner building at 63 Tottenham Court Road which has been identified in Charlotte Street Conservation Area Appraisal as making a positive contribution to the conservation area (a designated asset in accordance with PPS5 Annexe 2).</p> <p>Section HE9.5 of PPS5 states: <i>“Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. The policies in HE9.1 to HE9.4 and HE10 apply to those elements that do contribute to the significance. When considering proposals, local planning authorities should take into account the relative significance of the element affected and its contribution to the significance of the World Heritage Site or Conservation Area as a whole...”</i></p> <p>Policy HE9.1 sets out that there <i>“should be a presumption in favour of the conservation of designated assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be...”</i> The demolition tests of PPG15 paragraph 3.16-3.19 are reflected in Policy HE9.2 of PPS5. As identified above the building is considered to contribute positively to the character and appearance of the conservation area and its loss must be assessed against policies HE9.1 – 9.4.</p> <p>It is considered that the loss of the building would harm the character and appearance and therefore the significance of this part of the conservation area. However when assessed against policy HE9.2, it is not considered that this loss would represent <i>“substantial harm to or total loss of significance”</i> of the designated heritage asset, as the loss would primarily impact on one sub-area of the conservation area, and not the whole asset.</p> <p>Therefore, the demolition must be assessed against policy HE9.4, which states that, <i>“where a proposal has a harmful impact on the significance of a designated heritage asset which is less than substantial harm,” (i) the public benefit of the proposal must be weighed against the harm, and (ii) that it must be recognised that the greater the harm to the heritage asset, the greater the</i></p>

justification will be required.

- (i) No evidence has been provided to demonstrate that the existing building is not viable; indeed it is still in use. PPS 5 highlights that "keeping heritage assets in use avoids the consumption of building material and energy and the generation of waste from the construction of replacement buildings." (Policy HE1.1) As such officers do not consider that it can be demonstrated that there would be public benefit to the building's demolition and rebuilding.
- (ii) As total demolition is proposed, the harm to the heritage asset (this building) would be great, and therefore a high level of justification needed. As above, sufficient justification has not been given.

No information has been submitted which counters the view that the building should be retained. Any application for demolition would need to address the above points.

It is advised that a scheme which retains this building would be more likely to be acceptable. An additional storey on the building could be possible and the applicant is encouraged to explore this option. Unless a strong justification can be made for the demolition of the building it is unlikely that consent will be granted for its demolition.

Further demolition would take place to the other buildings behind the retained facades. No information has been submitted regarding the significance of the rear of the buildings in relation Charlotte Street Conservation Area which means no guidance can be given other than needing to comply with the criteria of PPS5.

Replacement building at 63 Tottenham Court Road

In the event that the applicant can justify the demolition of the existing building the following assessment is relevant, but it is not implied by these comments that such a case can be made.

This site is on a prominent corner at the junction of Goodge Street and Tottenham Court Road. The proposed replacement building is considered underwhelming and not of sufficiently high standard for this corner location where many of the surrounding buildings have a richness of detail. It is noted that previous appeals have failed on the ground of the quality of replacement building.

The architect is keen to pursue a proposal which ties in with the proposed redevelopment at 7-9 Goodge Street. The character of the surrounding area is for individual buildings of differing appearance, therefore it is not essential, in terms of impact on the conservation area, that this approach is taken. The two buildings could be quite different.

Replacement building at 5-7 Goodge Street

A more modern approach could work in this location. The use of brick and punched openings seems to be broadly appropriate. Of concern are the uniform floor heights and lack of hierarchy which jars with the neighbouring buildings. The architect should investigate an approach where there is more emphasis on

a hierarchy of floors, this could be done by reducing the floor heights higher up the building or introducing different detailing (for instance smaller windows) on the upper levels to provide some differentiation.

The set back of the fourth floor is small and this floor would not appear as a recessive or subordinate feature. It would need to be set back further. It is not clear what the materials proposed are but it should not be totally glazed and would need a significant degree of solidity.

Mansard for 1-3 Goodge Street

Whilst not objectionable in principle there are concerns regarding its appearance. No section has been provided through the front elevation but it appears somewhat top heavy and it is suspected this may be the case so that the floor level ties through with the proposed development of 63 Tottenham Court Road. A mansard roof on this building should be traditionally detailed with the windows sitting partly behind the parapet, a section drawing would definitely be needed. Camden Planning Guidance, paragraphs 41.16 to 41.20 should be consulted.

Roof addition to 62 Tottenham Court Road

Following the meeting additional section drawings were submitted of this element of the scheme for clarification. The existing elevations were inaccurate and rather than introducing an entire additional floor it is only proposed to extend the upper slope of the existing mansard by an additional height of 1 metre. Such an approach could work but more detailed drawings and viewpoints would need to be provided for a thorough assessment to be made.

Rear

No information has been provided regarding the appearance of the rear elevation. A scheme which creates the appearance of one large block needs to be avoided. It may be appropriate that the design respects original plot widths but without further information detailed advice cannot be given.

Internal arrangement

Previous comments raised concerns regarding the open plan use spanning many properties in an area of small scale uses. On the upper floors this has been addressed with a partition introduced between the 63 Tottenham Court Road and 1-3 Goodge Street.

Shopfronts

62 TCR

The shopfront is mostly modern and of poor quality although some original elements such as a cornice and pilasters appear to survive. It is quite possible that other details may be covered over. In principle there is no objection to a kiosk being inserted into this shopfront. However there are no details as to what this may look like. No original features should be lost and any proposal for roller shuttering would be resisted.

Corner unit

The enlarged retail unit at 63 TCR and 1-3 Goodge Street would retain the existing vertical division defining the shopfronts as seen from Goodge Street.

	<p>The planning expectation would be for the retention of the shopfront elements characteristic to Goodge street such as vertical framing with pilasters, stallriser and framing to doors. Concerns are still raised regarding the ground floor retail unit and a greater depth of division should be introduced rather than the shallow pier presently proposed. Essential to overcoming past reasons for refusal would be the acceptable treatment of the elevation and the visual impact of the new enlarged corner retail unit on the shopping frontage along Goodge Street.</p> <p>5-7 Goodge Street</p> <p>The shopfront at ground floor appears to be entirely glazed. Such an approach is not acceptable on Goodge Street and more robustness and framing are needed to tie in with the street. A stallriser, pilasters and framing for doors needs to be introduced but this could be done in a modern manner.</p>
<p>Transport</p>	<p>As with the previous proposals there would be a need for a Transport Statement (TS) to give details of</p> <ol style="list-style-type: none"> a. existing trip generation of site b. forecast trip generation c. outline details of extent of construction vehicle access during implementation. d. summary of likely servicing trips – including reference to waste servicing means of access and collection. <p>Construction works and construction vehicle movements may disrupt the day-to-day functioning of Tottenham Court Road, Goodge Street and surrounding streets for an extended period, and will need to be carefully managed to ensure disruptions are kept to a minimum. The works may also potentially disrupt other projects, such as works on Highways works on Tottenham Court Road. To ensure any disruptions are kept to a minimum, a servicing plan and a Construction Management Plan (CMP) would be sought by a s106 agreement.</p> <p>The intensification of uses on the site would likely bring about a significant increase in trip generation resulting from increased residential, waste and servicing trips. Therefore the scheme provides an opportunity for increased use and promotion of public transport as well as walking and cycling. A travel plan that informs staff, residents and customers about public transport options along with walking and cycling routes would be sought via S106 agreement. Such a plan would need to be submitted and approved prior to the occupation.</p> <p>The likely increase in local pedestrian movements would justify further improvements to improve pedestrian safety locally, in the form of amenity and connectivity within the surrounding area. Feedback has not yet been sought on the specific measures likely to be required but they could a requirement for a contribution towards measures such as</p> <ol style="list-style-type: none"> (i) <i>Measures to raise junctions in the vicinity of the development in order to both calm traffic and facilitate safer pedestrian crossing of this intersection;</i> (ii) <i>Measures to install raised speed tables locally calm traffic</i>