

29<sup>th</sup> May 2014



Mr Jonathan Markwell  
Development Management Planning Services  
London Borough of Camden  
Town Hall  
Argyll Street  
London  
WC1H 8ND

Sophie Chapman  
E: [svchapman@savills.com](mailto:svchapman@savills.com)  
DL: +44 (0) 203 320 8281  
F: +44 (0) 207 016 3769

33 Margaret Street  
London W1G 0JD  
T: +44 (0) 20 7499 8644  
[savills.com](http://savills.com)

Dear Mr Markwell,

**St George's Court, 2-12 Bloomsbury Way and 2-28 New Oxford Street**  
**Planning Application Reference 2012/1400/P**

**SUBMISSION OF APPLICATION FOR MINOR MATERIAL AMENDMENTS UNDER SECTION 73 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)**

Please find enclosed an application made on behalf of our Client, London and Regional Properties for minor material amendments to the following planning permission under Section 73 of the Town and Country Planning Act 1990 (as amended):

*"Erection of single storey glazed extension with associated roof terraces and new rooftop plant to provide additional office space (Class B1) at 9th floor level (following removal of existing 9th floor rooftop plant), change of use from offices to three flexible retail or restaurant units (Class A1/A3) at part ground floor level, reconfiguration of front entrance to corner of Bloomsbury Way and New Oxford Street, replacement of ground and first floor façade with double storey glazed frontages to all elevations and associated alterations for refurbishment of existing offices (Class B1)."*

This planning application was approved on 1<sup>st</sup> February 2013.

We are writing to formally request that Condition 3 is amended to reflect new drawing numbers. The proposed drawing numbers are as follows:

770\_GA\_B1 P9, 770\_GA\_00 P12, 770\_GA\_01 P10, 770\_GA\_02 P9, 770\_GA\_03 P9, 770\_GA\_04 P9,  
770\_GA\_05 P9, 770\_GA\_06 P9, 770\_GA\_07 P9, 770\_GA\_08 P9, 770\_GA\_09 P10, 770\_GA\_RF P11,  
770\_GE\_01 P7, 770\_GE\_02 P7, 770\_GE\_03 P7, 770\_GS\_01 P5, 770\_GS\_02 P5, 770\_GS\_03 P5.

Since the grant of planning permission, a greater understanding of the existing building has been realised, the design has evolved and a more detailed understanding of potential tenant demands has driven the requirement to apply for amendments to the consented scheme. These changes are explained below and in the supporting Amendments Design Document prepared by Buckley Gray Yeoman Architects.

In addition to this Cover Letter, this application is supported by the following:

- Planning Application Form;
- Site Location Plan;
- Amendments to Approved Scheme Planning Submission prepared by Buckley Gray Yeoman;
- Existing, approved and amended drawings prepared by Buckley Gray Yeoman;
- Acoustic Statement prepared by Hann Tucker;

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.  
Registered office: 20 Grosvenor Hill, London W1K 3HQ



- Formal pre-application feedback received from the London Borough of Camden;
- Completed CIL form;
- A cheque for the application fee of £195.

### **The Application Site**

The site is located on an island site between New Oxford Street and Bloomsbury Way, in Central London and lies close to the border of the City of Westminster.

The site area is approximately 0.23 ha. The existing building comprises 10 storeys plus basement level at a total GEA of 22,543 sq m.

The property occupies a prominent position; bounded by Bloomsbury Way (A40) to the north, New Oxford Street to the south and Bury Place to the east.

Within the existing building, the main entrance is located approximately half way along the Bloomsbury Way facade, with a small secondary entrance half way along the New Oxford Street facade. Access to the basement for servicing and car parking is from Bloomsbury Way.

The subject property is an imposing building constructed in the 1940's in a "neo-classical" architectural style: characterised by light-coloured stone elevations on the ground and first floor and a red brick facade above; stone column features on sections of the 3rd/4th floors; and several stone balcony/window dresses.

According to the Bloomsbury Conservation Area Appraisal, the western apex 'forms a distinctive landmark visible from the Oxford Street and Tottenham Court Road junction, and its height creates a strong sense of enclosure along side neighbouring buildings including the tall and bulky concrete mass [of Holborn Tower to the south]... St George's Court reads as a group with Commonwealth House in High Holborn and with BUPA House.'

It was originally built as part of the "Lessor Scheme" office blocks that make up London's first post-war wave of reconstruction. At street level, the building was used for various functions, including a public house, a bank, retail and restaurant uses. The upper floors were used as offices. According to the planning history, it was partly used as a temporary hostel/winter shelter for the homeless from December 1998 until April 2000.

In 2002 it was extensively refurbished by the applicant for occupation by the Ministry of Defence as their headquarters. The majority of the building was used for office functions, whilst a small section of the western apex at ground floor level was used as an Army careers centre.

To the west, New Oxford Street (A40) has a wide range of uses; the street level is predominantly retail and restaurant, creating a vibrant active frontage at this location, with secondary office accommodation to upper levels. On its north side on Bloomsbury Way, the property borders the Grade I Listed St George's Church, a large hotel and a continuation of active retail and restaurant uses. To the south on New Oxford Street is the former Royal Mail sorting office, which is a substantial concrete block of similar scale and mass to St George's Court. It is now named Holborn Tower, comprising small retail units on the ground floor and offices above. On its eastern boundary (Bloomsbury Way/Bury Place) is BUPA House, which is another Lessor building of nine storeys and a similar architectural style.

The surrounding uses are provided in a mix of traditional and contemporary properties, ranging from 4 storeys to the immediately neighbouring buildings at around 10 storeys. The Centre Point building at 35 storeys is located nearby.

The planning permission 2012/1400/P has been implemented and works have commenced on site.

### Relevant designations

The site is designated within the Proposals Map as in the Bloomsbury Conservation Area, the Central London Area, the Central Activity Zone (CAZ) and an Archaeological Priority Area. The site is located between, but just outside of, the Tottenham Court Road growth area to the south and west and the Holborn growth area to the east.

### Transport Connections

The site is a highly accessible area, with a PTAL rating of 6b. The site is located in Zone 1 and provides easy access to Holborn underground station, which is located approximately 300 metres east of the site, providing access to the Central Line and Piccadilly Line Services connecting to West End destinations including Oxford Circus and Green Park as well as the City of London and Kings Cross St Pancras. Works are currently being undertaken for the introduction of the new Crossrail service at Tottenham Court Road station, which is approximately 350 metres west of the site.

Other public transport consists of a range of bus services which run frequently along Bloomsbury Way and New Oxford Street; the nearest bus stop is located 20 metres from the main entrance to the building.

### Pre-Application Consultation

Prior to the submission of this application, the principle of the proposed amendments was discussed with you and your Transport and Design officer colleagues at a meeting held on Thursday 23<sup>rd</sup> May 2013. Formal feedback received from London Borough of Camden highlighted:

- The ground floor elevational amendments were considered appropriate.
- The car ramp was acceptable on balance and any increases in cycle parking space would be viewed favourably.
- Concern was raised as to the enlargement of the roof terrace at ninth floor due to the removal of the maintenance zone in terms of noise and disturbance and the erection of a 3 metre acoustic screen surrounding plant at roof level due to visual impact, particularly from key vantage points.

The response concludes as follows: "It is advised that there are no principle land use issues with the proposed amendments and the works are likely to be appropriate from a transport planning perspective. In terms of design considerations some further work is required prior to officers being in a position to support all of the proposed amendments sought. Regarding amenity matters it is advised that commentary/evidence should be provided at application to fully justify the proposals; at the present point in time there is no obvious reason why such a case cannot be made for the proposed amendments. Hence in overall terms the proposed works are likely to be able to be considered appropriate at officer level should additional works, as outlined above, be undertaken prior to any submission."

In the intervening period between the May 2013 pre-application meeting and the date of this submission, the roof top plant and acoustic screen requirements have been discussed further with the Design Officer at the London Borough of Camden. This is discussed further within this letter and information prepared by Buckley Gray Yeoman.

### The Proposed Changes

The proposed changes outlined are considered relatively minor in the context of the approved application 2012/1400/P on a holistic basis and in many cases, represent an improvement. The proposed amendments summarised in this section are detailed within the Amendments to Approved Scheme Planning Submission document prepared by Buckley Gray Yeoman.

The proposals have been considered against the relevant planning policies enshrined at national level within the National Planning Policy Framework (2012), at regional level within the London Plan (2011) and the Camden Core Strategy and Camden Development Policies Documents (2010).

At a national level, the NPPF sets out twelve core land-use planning principles which should underpin plan-making and decision-taking and which planning should achieve. Paragraph 14 sets out that at the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking. For plan decision-taking this means approving development proposals that accord with the development plan without delay.

### Ground Floor Amendments

At ground floor, the proposals seek to utilise some of the area consented for a café ancillary to the B1 use as additional retail space resulting in the creation of a fourth retail unit. Due to the extension of the Core B stair up to roof level which is also proposed (and discussed further within this letter), this has resulted in an increase of 21 sq m / 226 sq ft of additional commercial floorspace on a GEA basis. There have also been some further minor changes in relationship between the quantum of office and retail floorspace as a result of other amendments. These are detailed and explained on the Schedule of Areas within the document prepared by BGY.

Additional retail floorspace is deemed appropriate for this location, given that it is within the CAZ, Central London Area and designated a 'Highly Accessible Area'. These areas are considered to be suitable for a range of land uses including shops and offices and able to support a higher concentration of development, in accordance with Policy CS3 of the Core Strategy. In particular, Policy 2.11 in the London Plan states that developments within the CAZ should expand retail capacity.

The site also falls just outside two 'Growth Areas' and the Central London Frontage designation, which suggest in Core Strategy Policy CS7 that redevelopment schemes should enable the provision of new retail at ground floor level, thus further supporting retail growth in this location. Camden Development Policies DP12 states that when assessing developments, the Council will consider:

- a) the effect of non-retail development on shopping provision and the character of the centre in which it is located;
- b) the cumulative impact of food, drink and entertainment uses taking into account the number and distribution of existing uses and non-implemented planning permissions, and any record of harm caused by such uses;
- c) the impact of the development on nearby residential uses and amenity, and any prejudice to future residential development;
- d) parking, stopping and servicing and the effect of the development on ease of movement on the footpath;
- e) noise and vibration generated either inside or outside of the site;
- f) fumes likely to be generated and the potential for effective and unobtrusive ventilation;
- g) the potential for crime and anti-social behaviour, including littering.

The surrounding area is mixed use, mostly with an element of retail on the ground floor, thus suggesting that retail is fitting with the area. In the pre-application report, officers highlighted that "It is considered that the principle of providing further Class A1/A3 floorspace is appropriate." Furthermore, the planning history of the site also revealed that the ground floor of the building was previously used for retail space.

The principle of introducing retail uses at ground floor was considered acceptable under application reference 2012/1400/P and the Committee Report highlighted "The principle of introducing flexible retail (Class A1) or restaurant and café (Class A3) uses at ground floor level (as outlined in section 2 above) is considered to be welcomed in principle. The site is located within the Central London Area but between (and hence outside) two growth areas (namely Tottenham Court Road growth area, which is immediately to the south and west; and Holborn growth area, which is to the east) and outside of a designated Central London Frontage.

However despite this, given the location of the site, it is considered on balance that the introduction of retail uses along the frontages of the building would be likely to positively assist in promoting retail growth in this area, in line with the general principles outlined in CS3, CS7 and CS9.”

This increase of retail is considered appropriate under Policy DP10 which seeks to encourage the provision of small shop premises suitable for small and independent businesses. Policy DP12 ensures that “the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, local area or amenity of neighbours.”

Retail use should also be acknowledged for its role in enhancing the vitality of an area and can create an active frontage at street level, as well as allowing greater natural surveillance and thus the potential to reduce crime. This is in accordance with Core Strategy Policy CS17 and 7.3 of the London Plan, in which the Council will seek to reduce crime and promote safer public areas by incorporating safer design principles.

The applicant acknowledges that this amendment will result in a small loss of office floorspace at ground floor as a result of the additional retail unit however this is identified as café space associated with an office use rather than traditional desk based floorspace. Approved application 2012/1400/P resulted in a far greater loss of office than is proposed under this current application and this minor loss of office should be assessed holistically in terms of the wider benefits that retail can bring. This justification was accepted under application reference 2012/1400/P and the Committee Report stated “....it is considered that the proposals should be considered on a wider basis, especially as an aim of the LDF was to move away from the strictly land use based plans with a compendium of detailed policies and regulatory standards, towards plans which provide a strategic vision and objectives for the future of an area over time.” A significant proportion of office floorspace still remains as approved under application reference 2012/1400/P and the introduction of retail can be very attractive to potential commercial occupiers. Retail is considered an appropriate replacement land use for the reasons as set out above.

The proposals seek to relocate the bin store from basement to ground floor with access off Bury Place which is considered an easier and more functional location and it was highlighted at the pre-application meeting that this is likely to be welcomed by the Environmental Health Team. The formal feedback received from the London Borough of Camden states that this relocation raises no principle issues from a transport perspective.

### Transport

The consented scheme shows a car lift to provide access for cars from ground to basement floor. The revised proposal seeks to re-use the car ramp that existed prior to the 2001 refurbishment. Part of it remains in situ and the rest will be rebuilt in the same position. The Council’s pre-application response highlights “The proposals indicate that instead of the existing vehicular lift facility to the basement floor it is now sought to incorporate a ramped access. Although the gradient is considered to be of a level that transport planning would normally resist, it is considered that, on balance, a flexible approach will be able to be taken. This is given the context of the physical constraints of the site, the relevant history and consideration of the requirements of cyclists. As such transport planning consider this element of the proposals to be adequate.”

The proposals also include the scope to provide additional cycle parking facilities which was welcomed in principle at the pre-application meeting. This has been driven by tenant demand and is considered to accord with London Plan Policy 6.9 which relates to cycling and states that Mayor will work with strategic partners to bring about a significant increase in cycling and walking. Cycling and public transport provision is further covered in Camden Development Policies Policy DP17, which aims to promote safe pedestrian and cycle links.

The project team have confirmed that the proposals will have a negligible impact on trip generation figures to and from the site, and formal feedback from the Council highlights that an update to the Travel Plan will not be required.

### Ground Floor Elevational Alterations

Minor alterations are proposed to the elevations including; the removal of a secondary entrance onto New Oxford Street, amendments to suit structure, a revolving door added to the main entrance; louvers removed, added or amended and an amendment to the canopy. The ventilation strategy has also been considered and the proposals seek to accommodate louvre and grill requirements in a logical approach.

The location of these amendments in respect to the building are depicted in the Amendments to Approved Scheme Planning Submission” prepared by Buckley Gray Yeoman.

Throughout the detailed design period, the applicant acknowledged national, regional and local planning policies that seek to ensure high quality design. The NPPF notes that good design is a key aspect of sustainable development and is indivisible from good planning and makes it clear that the Government attaches great importance to the design of the built environment. At the regional level, London Plan Policy 7.4 concerns respect for the local context in terms of form, function and structure of the area. Policy 7.6 relates to architecture and seeks the highest quality of urban design which positively contributes to the public realm.

At a local level, Policy CS14 highlights the Council will ensure that places and buildings within the Borough are attractive, safe and easy to use by:

- a) Requiring development of the highest standard of design that respects local context and character;
- b) Preserving and enhancing Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
- c) Promoting high quality landscaping and works to streets and public spaces;
- d) Seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;
- e) Protecting important views of St Paul’s Cathedral and the Palace of Westminster from site inside and outside the borough and protecting important local views.

Camden Development Policies Policy DP24 relates to high quality design and states that the Council “will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider”:

- a) character, setting, context and the form and scale of neighbouring buildings;
- b) the character and proportions of the existing building, where alterations and extensions are proposed;
- c) the quality of materials to be used;
- d) the provision of visually interesting frontages at street level;
- e) the appropriate location for building services equipment;
- f) existing natural features, such as topography and trees;
- g) the provision of appropriate hard and soft landscaping including boundary treatments;
- h) the provision of appropriate amenity space; and
- i) accessibility.

The applicant also acknowledges Policy DP25 which considers the conservation of the Borough’s heritage and states that in relation to Conservation Areas, the Council will: “only permit development within conservation areas that preserves and enhances the character and appearance of the area, amongst other criteria.”

In particular, the formal feedback from the Council regarding design highlighted that “No design issues are raised in respect of the proposed ground floor changes, which individually and cumulatively are considered to be appropriate both in terms of the building and wider conservation area.”

The broad principles of the approved design approach are retained and these are small scale alterations to the facade which will maintain the high quality of the design. The amendments are considered to be sensitive to the historical building and Conservation Area, in accordance with Development Policies DP24 and DP25.

#### Ninth Floor

The need for a crane and the maintenance zone is no longer required at ninth floor and hence the glass balustrade can be moved to the perimeter to create an enlarged roof terrace. The fact that this maintenance zone is no longer required is considered to represent a positive opportunity to better utilise this space. The proposals also seek to remove Air Handling Unit ducts which is considered to represent a visual enhancement and a window has also been added to the stair core.

The applicant acknowledges that there is a condition attached to the Decision Notice for application reference 2012/1400/P which restricted the use of the area in question being used as roof terrace on the basis of amenity issues and the Council raised some concern at the pre-application meeting that an enlarged area would give rise to noise disturbance and overlooking issues. It was requested that any planning application would provide commentary/evidence that these concerns would not be realised.

There is no bar/restaurant at this level and in any event, for BREEAM purposes, a landscaping strategy will be developed for this area thereby reducing the quantum of floorspace which would be available for social gatherings. It is therefore envisaged that there will be a negligible impact on amenity issues associated with this amendment which are considered to be outweighed by the benefit of enlarging the amenity provision and removal of the unsightly maintenance zone.

In terms of relevant policy it is considered that Camden Development Policies Policy DP26 in particular parts a) visual privacy and overlooking and d) noise and vibration levels would be most relevant. The policy states that the Council will consider the impact of development with regards to occupiers and neighbours and will ensure that development is not detrimental to amenity and for the reasons set out above, the proposal accords with Policy DP26.

#### Roof Level

At roof level, the Bury Place Core B staircase has been extended up to roof level. This change was discussed at the pre-application meeting and formal feedback received in relation to this element states "Regarding the Bury Place staircase addition at roof level, no design issues are raised with this element of the proposals. It is considered that the removal of the window cleaning mechanism is likely to improve the appearance at parapet/roof level."

Since approval of the planning application 2012/1400/P, the plant requirements have been carefully considered and the need for a small quantum of additional plant is required.

Due to acoustic requirements, the need to erect an acoustic screen surrounding the plant at roof level has arisen. Since comments raised at the pre-application meeting regarding the visibility of this screening, the project team have carefully considered the requirements.

The need for an acoustic screen has been driven by acoustic requirements and in light of Condition 7 attached to planning permission 2012/1400/P. An acoustic statement prepared by Hann Tucker supports this planning application to demonstrate these requirements.

Various information was submitted to the Council during the intervening period since the May 2013 pre-application meeting and the date of this application including an 'Acoustic Plant Enclosure Options' document and a revised presentation which demonstrated how the plant layout and screen have been condensed down to the tightest possible arrangement, whilst still allowing for access, maintenance and ventilation. 3D models also formed part of this submission accompanied by a section drawing which reduced the plant screen height from the previous proposal.

Feedback received from the London Borough of Camden stated that the proposed roof top plant would be acceptable on the basis of the information provided given it is the 'next available option' if amendments to plant are required.

It is considered that the roof top plant proposals will have positive impacts both in design terms through creating a more consistent, unified form when viewed from street level and in acoustic terms and is therefore considered in accordance with Camden Development Policies 24 and 26.

### **Summary**

Since obtaining planning permission in February 2013, during design development and post approval of the application following a greater understanding of the existing building, the need for various amendments have arisen that our client is seeking to apply for. It is not considered that these amendments are material to the context of the wider scheme and in many cases are considered to represent an improvement.

The proposals are considered appropriate both in land use and design terms.

We trust that you find the above and enclosed is in order but should you have any questions then please do not hesitate to contact myself or Duncan Parr on 07807999234. In the meantime we look forward to receiving confirmation that the application has been validated.

Yours sincerely,

A handwritten signature in black ink, appearing to read "SChapman", with a long horizontal flourish extending to the right.

**Sophie Chapman**  
Savills