

**Sent:** 12 June 2013 11:25  
**To:** Peck, Amanda; Planning  
**Subject:** FAO - Ms Peck. Representations on behalf of St Giles in the Fields PCC concerning 2013/1957/P and 2013/1970/P  
**Follow Up Flag:** Follow up  
**Flag Status:** Orange  
**Attachments:** 130612 - 2013\_1957\_P 2013\_1970\_P Representations on behalf of St Giles in the Fields PCC.pdf

Dear Ms Peck

Following our telephone conversation last week, please find attached a letter of representation written on behalf of St Giles in the Fields Parochial Church Council (PCC), to the development at Centre Point and specifically on the site of The Intrepid Fox.

As discussed the letter is a supplement to the original objections raised on behalf of the PCC in a letter dated 8th May.

When we spoke you suggested that the scheme would be presented to the Development Control Committee on the 4th July, could you confirm whether this is still the case?

Should you wish to discuss any of the issues raised in the attached please do not hesitate to contact me.

Kind regards

Owain

Owain Nedin  
Planner  
Planning and Regeneration

Cluttons LLP, Portman House, 2 Portman Street, London W1H 6DU  
T: +44 (0) 20 7647 7141 | M: +44 (0) 751 5172315 | F: +44 (0) 20 7647 7067

[www.cluttons.com](http://www.cluttons.com)



Chartered Surveyors | Property Consultants

*Cluttons - in the United Kingdom, Europe, Middle East, South Africa and Asia Pacific\**  
*\*VPC Asia Pacific in association with Cluttons*

Please consider the environment, do you really need to print this email?

Cluttons LLP is a limited liability partnership, registered in England and Wales under the number OC310771, with its registered office at Portman House, 2 Portman Street, London, W1H 6DU. Cluttons LLP is regulated by the Royal Institution of Chartered Surveyors (RICS).

17/06/2013

Each entity or practice in the Cluttons global network is a distinct and separate legal entity. Its ownership and management is distinct from that of any other entity or practice whether operating under the name Cluttons LLP or otherwise.

The information contained in this message (including any enclosures/attachments) is confidential, may be legally privileged and is intended only for the use of the individual(s) to whom it is addressed. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this message is strictly prohibited. If you have received this message in error, please destroy it and notify the sender immediately. Your cooperation is appreciated.

This email has been scanned by the Symantec Email Security.cloud service.

---



Contact Owain Nedin  
Direct Dial 020 7647 7141  
Email owain.nedin@cluttons.com

Chartered Surveyors • Property Consultants

Cluttons LLP, Portman House  
2 Portman Street, London W1H 6DU  
Tel 020 7408 1010  
www.cluttons.com bx 44432 Marble Arch

FAO: Ms. A Peck  
Development Control Planning Service  
London Borough of Camden  
Town Hall  
Argyle Street  
London  
WC1H 8ND

12th June 2013

By e-mail

Dear Ms Peck

**Planning and Listed Building Applications: 2013/1957/P; 2013/1961/L; 2013/1970/P; 2013/2000/L.**

**Centre Point Tower, Centre Point Link and Centre Point House 101-103 New Oxford Street and 5-24 St Giles High Street London WC1A 1DD.**

**Letter of representation on behalf of St Giles in the Fields Parochial Church Council**

As discussed in our telephone conversation on 4<sup>th</sup> June 2013, we have been instructed by St Giles-in-the-Fields Parochial Church Council [PCC] to make representations on their behalf in objection to the proposed schemes referenced above. In short, the PCC objects in the strongest terms to the proposed development on the site of 'The Intrepid Fox'. As you will be aware the PCC have previously made representations against the development of 'The Intrepid Fox' in a letter dated 8<sup>th</sup> May 2013. This letter serves to support previous comments as well as present additional matters for consideration by those determining the applications.

The comments made both in this letter and the previously submitted letter are considered by the PCC to hold equal weight. The issues the representatives of the PCC have identified for further consideration are as follows:

***Over development of 'The Intrepid Fox' site:***

As alluded to within the first letter of objection, the proposed 11 storey tower that will house the affordable housing element of the scheme is considered unnecessary over development. The purpose of this element of the proposal is clear, it affords the developer with an opportunity to meet its affordable housing requirement in the scheme at the lowest possible impact on values elsewhere. However, the impact it will have on the setting of the Church of St Giles in the Field, a Grade I listed building, is not outweighed by the scheme's contribution to affordable housing.

The impact on the Church and further the validity of 'The Intrepid Fox' scheme should be viewed from two perspectives neither of which is immediately clear when considering the entire Centre Point application. First, the cumulative impact of 'The Intrepid Fox' development



ISO 9001:2008 FS 559910



Cluttons - in the United Kingdom,  
Europe, Middle East, South Africa,  
Asia Pacific\* and the Caribbean  
\*VPC Asia Pacific in association with Cluttons  
Regulated by RICS

Cluttons LLP is a limited liability partnership in England and Wales under the number OC310771 Registered office and head office: Portman House, 2 Portman Street, London W1H 6DU



when considered alongside the Central Saint Giles scheme should be given due regard. Our client objected to the Central Saint Giles scheme, not least on the grounds that the increased height, bulk and massing, including moving the building envelope significantly closer to the Church, was detrimental to the Grade I listed Church's setting. We are aware that this concern was shared by many other objectors. The proposals for 'The Intrepid Fox' site, by virtue of its significant increase in height, bulk and massing in addition to its movement towards the Church, would have a similar detrimental impact. In aggregate, should 'The Intrepid Fox' scheme be granted planning permission, the overall sense of enclosure would be such that the setting of the Grade I listed Church would be significantly diminished.

Before the Central Saint Giles scheme was conceived the Church benefitted from an open vista that afforded it good natural daylight, despite its northerly aspect, as well as good outlook and little sense of enclosure. Should 'The Intrepid Fox' site be developed as proposed, then the change, all in the space of less than ten years, will have been so dramatic and detrimental to the Church that it will have changed beyond all recognition. Therefore, in considering this application, the Church request that officers consider the increased size, bulk and massing in aggregate to Central Saint Giles and pose the question as to whether, had both schemes been brought forward together, would the cumulative impact on the Church have been considered inappropriate? We maintain it would have and ask that the determining officers consider this impact during their deliberation.

Secondly, we request that planning officers consider whether the scheme proposed at 'The Intrepid Fox' site would be considered acceptable had it come forward in isolation to the rest of the Centre Point scheme. It is proposed to be used to provide affordable housing, however this alone should not be its justification. Had someone applied to develop this site with an 11 storey tower for residential use as an independent development would it be approved? We request that the Local Authority consider this and not see 'The Intrepid Fox' development as an addition to the larger scheme, which by virtue of its overall scale, hides the significant detrimental impact 'The Intrepid Fox' development taken in isolation will have.

#### ***Question of public benefit***

One of the documents available on the online planning register lists over 2000 objectors to the demolition of 'The Intrepid Fox'. It is clear from this document that the venue is considered of value and importance by the local community and visitors alike. On a related point, English Heritage's comments on the scheme confirm that 'The Intrepid Fox' element of the scheme would impact on the heritage merit and character of the surrounding area and listed buildings. English Heritage makes it clear that the scheme should only be considered acceptable if the Local Authority believes that the public benefit the scheme will bring outweighs the damaged caused to heritage assets. With reference to the 2000+ negative comments we would argue that this element of the scheme does little to deliver tangible public benefit that can be considered to out weigh the obvious harm it will cause.

#### ***Substandard design***

A review of the proposed affordable units suggests that the design will result in substandard accommodation for future occupiers. The building in which the affordable units are proposed is new build and there should, therefore, be little that prevents it from offering the highest level of design, meeting all modern requirements. However, in an attempt to fit the required number of affordable units into the scheme, as an afterthought and without housing them within the





more valuable areas of the scheme, the application is proposing an 11 storey tower built upon a small floor area in which 13 (or 16) units are expected to 'work'. The result is that all of the 1 bedroom units to the west of the building will be single aspect, and that aspect will be north west facing, where only evening sunshine will reach the apartments in high summer months. As is appreciated within Camden's Development Policies DPD, dual aspect is an important consideration in the social housing market (3.25. pp. 33)

The design is not in accordance with basic design principles supported by the Mayor of London. The design shows that the site of 'The Intrepid Fox' is not suitable for the number of units the developer needs to provide. There is ample room within the other elements of the scheme to accommodate units with better aspects in a converted building. The PCC feels that 'The Intrepid Fox' site is not suitable for housing and that the applicant has clearly tried to squeeze the affordable units in, with little regard to the quality of the future occupant's amenity. The scheme should not be considered of sufficient design quality for new build accommodation in Camden. Its approval would set a precedent for future poor quality new build proposals in the Borough.

#### ***Multiple applications***

We note that there are two applications running concurrently with one providing 13 affordable units and the other 16 within an increased building envelope on the site of 'The Intrepid Fox'. The PCC would like to make it clear that it considers the smaller scheme to be wholly inappropriate in this location and therefore would not consider it to offer a suitable alternative to the larger scheme. Both applications should be refused planning permission.

Thank you for accepting this letter of objection on behalf of the St Giles in the Fields PCC in addition to the letter already submitted. We would be happy to discuss any of the points raised above with you in more detail and should you have any questions or queries please do not hesitate to contact Owain Nedin at the above address.

Finally, we would also request that the PCC be given the opportunity to address Camden's Development Control Committee when the application is determined so that they may present their reasons for objecting to Members.

Yours sincerely

[Redacted signature]

Owain Nedin  
Planner  
Cluttons LLP

cc The Ven. Dr William Jacob - The Rector of St Giles-in-the-Fields