
Report to London Borough of Camden Council

by Louise Crosby

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 6 February 2014

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO FITZROVIA AREA ACTION PLAN

Document submitted for examination on 18 April 2013

Examination hearings held between 2 and 4 July 2013

File Ref: PINS/X5210/429/10

Abbreviations Used in this Report

AMR	Annual Monitoring Report
CDP	Camden Development Policies DPD
CS	Core Strategy
FAAP	Fitzrovia Area Action Plan
The Framework	The National Planning Policy Framework
GLA	Greater London Authority
LDS	Local Development Scheme
LP	London Plan
MM	Main Modification
SA	Sustainability Appraisal
SALP	Site Allocations Local Plan
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy

Non-Technical Summary

The report concludes that the Fitzrovia Area Action Plan (the Plan) provides an appropriate basis for the planning of the Fitzrovia Area over the next 12 years providing a number of modifications are made to the Plan. The Council has specifically requested that I recommend any modifications necessary to enable them to adopt the Plan. All of the modifications to address this were proposed by the Council and I have recommended the inclusion of all after full considerations of the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- For compliance with the National Planning Policy Framework (the Framework), alteration of the wording in Policy F1 to emphasise the Plan's presumption in favour of sustainable development;
- Alterations to ensure that it is clear that the priority land use in Camden borough is housing;
- Changes to the northern boundary of the Plan area resulting in a number of modifications to text and maps throughout the Plan;
- Alterations to the Fitzroy Square Gardens boundary shown on numerous plans to exclude land in the public highway;
- Changes to some character area boundaries to ensure consistency of approach;
- Alterations to text in various parts of the plan to highlight the importance of protecting living conditions;
- Changes to text to increase flexibility in relation to some opportunity sites;
- Amendments to the criterion in relation to the provision of public open space as part of new developments; and the need to increase the overall amount;
- Alterations to the advice in relation to the provision of affordable housing to ensure compliance with the London Plan;
- Introduction of text to clarify the need for facilities for taxis and coaches;
- Introduction of text to deal with the matter of surface water drainage;
- Amendments to clarify and correct the anticipated levels of development the Plan will provide;
- Changes to the text in relation to a number of opportunity sites to clarify that increases in non-residential floorspace should be matched by equal increases in residential floorspace;
- Amendments to emphasise the need for a balance between residential, institutional and commercial uses;
- The introduction of important general design guidance, in particular in relation to tall buildings and local views;
- Further design guidance in relation to some opportunity sites;
- Advice for development sites which are close to the boundaries of different character areas.

Introduction

1. This report contains my assessment of the Fitzrovia Area Action Plan (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the Fitzrovia Area Action Plan, Submission Document (December 2012), submitted to the Secretary of State on 18 April 2013.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. The main modifications that go to soundness have been subject to public consultation and, where necessary, Sustainability Appraisal (SA) and I have taken the consultation responses into account in writing this report.

Assessment of Duty to Co-operate

5. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
6. In London, to an extent, the duty to co-operate is achieved through the workings of the Mayor's London Plan and the Mayor/Greater London Authority (GLA) has confirmed that the Plan is in general conformity with the London Plan (LP).
7. Some of the studies carried out to inform the adopted Core Strategy (CS), the adopted Site Allocations Local Plan (SALP) and this Plan were carried out in conjunction with other London Borough Councils, the Greater London Authority (GLA) and various agencies. These include the Central London Infrastructure Study and the Strategic Housing Market Assessment.
8. The Plan area has a boundary with Westminster City Council. They were consulted at each stage of the Plan preparation through written correspondence. Regulation 4 of the Town and Country Planning (Local Planning)(England) Regulations 2012 prescribes 12 bodies and any local enterprise partnership and local nature partnership as bodies required by s33A of the 2004 Act to cooperate in maximising the effectiveness of the preparation of development plan documents so far as relating to a strategic

matter. The Council has provided evidence of its engagement with all the relevant bodies prescribed by Regulation 4.

9. None of the bodies with whom engagement has taken place have expressed any concerns in relation to the level of engagement or the subsequent outcomes. However, a number of people would have liked this Plan to have been prepared jointly with Westminster City Council to cover the area of Fitzrovia within their administrative boundary. Westminster City Council however declined the invitation from the Council to do this, but have responded to consultations in respect of the Plan. Importantly, the Plan raises no significant strategic or cross-border issues and the Plan takes account of and references the Westminster Core Strategy.
10. Having regard to all of the above I conclude that the Duty to Co-operate has been met.

Assessment of Soundness

Preamble

11. The Plan will cover the period 2013 to 2025 and is prepared within the context of the LP, an adopted CS, Camden's Development Policies DPD (CDP) and the SALP. The CS identifies housing (including affordable housing) as a priority land use in order to meet the borough's growing population. The LP contains a minimum 10 year target of 6650 additional homes in Camden from 2011 to 2021 (an annual monitoring target of 665pa). The CS sets a more challenging aspiration of approximately 12,250 additional homes between 2010/11 and 2024/25. The SALP identifies 43 sites for development, across the borough, but none of those are within this Plan area.
12. Based on the opportunity areas defined in the LP, the CS identifies a number of growth areas within Camden which are suitable for higher density redevelopment. These are King's Cross, Euston, Tottenham Court Road, West Hampstead Interchange and High Holborn (Central London) and they are largely based around transport interchanges where high accessibility already exists or increased capacity is planned. Euston Growth Area lies immediately to the north of this Plan area. Part of the Tottenham Court Road Opportunity Area (known in the CS as a Growth Area) falls within the southern Plan area. The remainder is adjacent to the south and west and is partly within the administrative boundary of Westminster City Council. The Holborn Growth Area also lies nearby, to the east.
13. This Plan is divided into 11 character areas and identifies 14 opportunity sites that are considered to be available, realistic and with a reasonable prospect of success. Guidance is provided for all of the broad range of identified sites highlighting specific opportunities, objectives or requirements where appropriate.

Main Issues

14. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, various main issues upon which the soundness of the Plan depends have been identified. These

are dealt with in turn below. Representations on the submitted Plan and the published main modifications have been considered insofar as they relate to its soundness, but they are not reported on individually.

General Matters

Does the Plan accord with the National Planning Policy Framework and does it reflect the Framework's presumption in favour of sustainable development?

15. The Framework emphasises the importance of encouraging sustainable development through enabling economic growth and promoting housing development. Such a positive approach is inherent in the Council's CS, CDP and SALP. The Plan has been prepared in line with this approach and seeks to meet the identified needs of this particular area through a range of sustainable opportunity sites. As a result, the Plan sits comfortably with the general direction of the Framework and has been positively prepared.
16. Notwithstanding this there is a need for **MM4** to amend the wording of Policy F1 in order to achieve consistency with the overarching presumption in the Framework of favouring sustainable development. I realise that even with **MM4** the wording of Policy F1 still differs from the model wording published on the Planning Portal. However to my mind it is in line with the intentions of the Framework and does not differ from the model wording to the extent that the soundness of the policy is brought into question.

Is the Plan in general conformity with the London Plan 2011?

17. As set out above, the Plan translates the aspirations of the LP and CS further by identifying sites to meet the demands of this particular area of the borough. The GLA was consulted at the start of the Plan preparation and at all subsequent stages. Comments made by them in relation to the submission version of the Plan about affordable housing have resulted in **MM14**. This is necessary to ensure that the affordable housing policy in the Plan accords with that in the LP.
18. Similarly, Transport for London have been consulted at each stage of the Plan and are content with it subject to the inclusion of clear plans and text through **MM23** which deals with the need for access for taxis and coaches and a transport management plan to control pick-up and set-down by taxis and coaches. This modification is necessary to make the plan effective. With these main modifications, the Plan would be in general conformity with the LP.

In broad terms has the area covered by the Plan, and the character areas within it, been properly defined?

19. This Plan covers a discrete area of Camden borough. It is bounded to the north by Euston Road although this boundary has been modified slightly to prevent an overlap with the area that will be covered by the Euston Area Action Plan which the Council anticipate will be ready for examination in 2014. Consequently, changes to the text and various maps within the Plan are necessary, as set out in **MMs1, 2, 6, 9, 10, 16, 21, 25, 27, 29, 31, 35, 36 & 44**. Included in these main modifications and others are changes to

the boundary of Fitzroy Square Gardens which will be drawn more accurately to exclude land in the public highway. The southern Plan area is bounded by New Oxford Street. Its eastern boundary is formed by Gower Street/Bloomsbury Street. Its western boundary is slightly more complicated, but includes Cleveland Street, Charlotte Street and Gresse Street, among others.

20. The 11 character areas have been defined taking into account the type, use and size of buildings; the grain and character of existing development; the characteristics of the frontages (residential, office, retail, food or entertainment); the function of the streets and spaces; and heritage assets and designations. The character area sections of the Plan set the context for the opportunity sites and provide broad development principles. They also set out where opportunities exist for improvements to public realm and open space.
21. The margins of the character areas do not have sharp boundaries and this could provide problems for future developers on sites close to the edge of a character area. Consequently **MM30** explains that where proposals are close to a boundary or straddle the boundary of a character area, attention should be paid to the character areas on either side of the boundary.
22. There is a block of development within the Plan that appears in both the Charlotte Street Character Area and the Howland Street Character Area. It was agreed at the hearing sessions that it should fall within the Charlotte Street Character Area, and so amendments to the boundary to the rear of the west side of Charlotte Street (properties adjacent to Tottenham Court Mews) are proposed. This is dealt with by **MM37** and is necessary for the Plan to be effective.
23. Similarly, the boundary between the character areas of Ridgmount Gardens and UCH and University Street has been drawn in such a way that Gordon Mansions apartments fall within two different character areas. For consistency it is important that these two blocks of development are subject to the same character area policies and this is achieved by **MMs31, 39 & 41**.
24. In relation to the character areas of UCH and University Street, Bedford Square, Alfred Place, Tottenham Court Road and Ridgmount Gardens additional character area principles and guidance need to be added for clarity and completeness. These are addressed through **MMs32, 33, 34, 38, 40, 42 & 67**.
25. The Plan contains a composite map of the combined character area principles and public realm opportunities. It is necessary to amend this map to take account of all of the relevant modifications set out above (**MM43**). All of these modifications in relation to the character areas within the Plan are necessary for it be justified and effective.

In general terms, are the opportunity site allocations consistent with the Core Strategy? Do they reflect its overall strategy for the distribution of growth and development including promoting the provision of homes, jobs and other facilities in areas with significant redevelopment opportunities at, or near, transport hubs? Do they also support appropriate development in other accessible locations, with more limited change elsewhere?

26. The Council is on target to meet its long term housing supply targets and has sufficient sites in its SALP to meet the housing targets set out in the CS. This Plan allocates additional opportunity sites with the potential to provide additional housing, including affordable housing and student housing. The Plan has identified 6 opportunity sites where development of housing is expected and 7 others where housing could potentially be developed. These will increase the total potential development in Fitzrovia to approximately 200 additional self-contained homes and 100 student rooms.
27. The CS predicts that the demand for offices will increase by 615,000sqm between 2006 and 2026. The Fitzrovia area will contribute up to 10,000sqm of additional office floorspace through the opportunity sites. There is a numerical error in the Plan in relation to number of homes that could potentially be delivered and a lack of emphasis on the requirement for mixed use policies to be applied. These shortcomings are dealt with by **MM5** which is necessary for the Plan to be justified and effective.
28. The Plan also provides advice in relation to food, drink and entertainment uses in the area, which I saw are numerous. These are important to the vitality and viability of the area but are not always appropriate, particularly in large numbers in densely populated residential areas such as this. In order to temper expectations of such development being permitted on Tottenham Court Road and New Oxford Street, **MM19** is necessary for the Plan to be effective.
29. In line with CS policy CS9 the Plan advises that small and medium sized enterprises will be supported. These are recognised as being a valued part of the character of Fitzrovia. These types of businesses are an important part of the balance of other common uses such as residential, institutional and commercial. This is not currently clear in the Plan and so **MM18** will deal with this. It is necessary for the Plan to be effective.
30. Fitzrovia is not only home to a considerable resident population, but it also attracts a large influx of workers and visitors each day. In part, this is because of the large number of educational and medical institutions concentrated within this relatively small, densely developed area. The Plan could more fully acknowledge the needs of the residential population and the importance of the balance of uses and so **MMs3, 8, 11, 12, 17, 20, 22 & 24** have been introduced to remedy this. These modifications are necessary for the Plan to be effective.

Have heritage and design matters been adequately addressed in the Plan?

31. Fitzrovia is home to numerous designated heritage assets including listed buildings, conservation areas and buildings that make a positive contribution to the character of the conservation area they are in. The Plan includes a composite map of all these, but the Council have omitted to identify 52 Tottenham Street as making a positive contribution to the Charlotte Street Conservation Area. **MM7** will remedy this and it is necessary for the Plan to be justified and effective.
32. CS policy CS14 seeks to preserve and enhance Camden's heritage assets and their settings, including conservation areas, listed buildings, and historic LBC parks and gardens. The Plan seeks to ensure that new development is designed in a manner that protects and enhances heritage assets.
33. Contained within the Plan are urban design principles for new development to ensure that it has regard to the distinctive characteristics that make Fitzrovia unique. However, **MM28** is necessary to reflect the advice in other published and adopted documents. In particular it adds sections of text which provide advice on the approach that will be taken in relation to proposals for 'tall buildings' and also the importance the Council will place on 'local views'. It is necessary to make the Plan effective.

Are the opportunity sites appropriate and deliverable, having regard to the provision of the necessary infrastructure, affordable housing and other facilities, and taking account of environmental constraints?

34. While the Opportunity Sites are distributed throughout the Plan area they are generally clustered in the Howland Street Character Area; the UCH and University Street Character Area; and the Central Cross and Hanway Street Character Area areas where there are larger sites, which have a realistic prospect of being developed.
35. Affordable housing targets are considered to be appropriate and deliverable within this Plan. They seek to ensure that the maximum reasonable levels are provided and acknowledge the viability implications of affordable housing in development. Overall 13 out of the 14 opportunity sites could potentially be developed for housing and could deliver affordable housing, subject to individual site requirements and CDP policies.
36. Whilst housing is the priority land use for the Council, the Plan encourages and promotes the provision of other facilities such as employment, retail, community, and healthcare facilities where appropriate. The key development principles for all of the opportunity sites plan positively for the provision of public open space.
37. One of the criteria the Council has used to assess sites is whether there are any environmental constraints. The assessment has been carried out by evaluating the options set out in the Sustainability Report. Thus they informed the Council's choice of sites when compiling the Plan. I am content that the Council has engaged with key bodies such as English Heritage, the Environment Agency and Natural England in order to assess the deliverability of sites with regard to environmental constraints such as sustainable urban

drainage and heritage constraints. Where relevant, the Plan identifies the relevant policies and detailed requirements that are needed to ensure environmental constraints can be overcome in order for them to be considered appropriate, feasible and deliverable.

38. While consideration has been given to the necessary infrastructure, the Plan needs to provide more detailed information in relation to the issue of surface water flooding here and highlight the relevant policies in the CS and CDP, in response to representations. This is achieved by **MM26**, which is necessary for the Plan to be justified and effective.

In general terms, is the Council's approach to increasing public open space in the Fitzrovia area justified and based on an assessment of reasonable alternatives?

39. The Camden Open Space, Sport and Recreation Study 2008 indicates how much public open space is available per person in each broad area of the borough and identifies where there are deficiencies in access to public open space. This Plan's evidence base shows that the amount of public open space in the Plan area is limited compared with the borough as a whole and the wider Central London part of Camden, south of Euston Road.
40. The public open space section of the Plan seeks to address the existing shortfall of public open space through a sequential approach to the provision of public open space which is set out in 'Land Use Principle 2'. The preferred option is the provision of public open space by the developer on the development site; the second is developer provision nearby. In recognition that this may not be possible in some instances the Plan advises that the Council may consider a third option which is payment towards increasing the capacity of an existing open space; or a fourth option which is payment to create usable spaces within the street environment.
41. The first 3 stages in the sequence are consistent with the CS approach for Central London as set out in CS policy CS15 (b). The Council have added a fourth stage into this Plan to take account of the fact that there may be limited opportunities to increase or enhance open space availability in the Plan area because of its densely built up nature. **MM15** ensures that the wording of this part of the Plan accords with policies already adopted as well as *Camden Planning Guidance CPG6 Amenity*. Subject to this modification the policy would be justified and effective.
42. The Council also commissioned an Open Space and Public Realm Study to explore how more open space could be provided in this area. Many ideas from the study have been included in the Plan to augment the sequential approach, particularly a range of opportunities to create public open space by converting parts of the highway. The co-ordinated development of the opportunity sites is intended to provide a number of new public open spaces, pedestrian links and widened footways for seating and planting.
43. The Sustainability Appraisal (SA) compares the combined impact of the Plan and the Core Strategy with the alternative of only implementing the Core Strategy. The SA indicates that the addition of Land Use Principle 2 to the provisions in the CS would have a major beneficial impact on sustainability.

The Fitzrovia Open Space and Public Realm Study compare the advantages and disadvantages of each option it suggests. This guided the approach taken in the Plan on this matter.

Overall, does the Plan deal adequately with uncertainty and is sufficient consideration given to monitoring and triggers for review?

44. The Council produces a housing trajectory each year as part of its Annual Monitoring Report which shows how they are bringing forward housing sites over the next 15 years. It also measures their anticipated performance against their monitoring target for additional homes. Monitoring indicators are set out in the CS and the AMR measures performance and updates the indicators. The Plan undertakes to assess the planning outcomes for the area it covers by using the existing indicators where they are relevant, and also monitor progress against a delivery plan which forms part of this Plan. The SA for the Plan specifically indicates which of the existing indicators can be used to monitor the sustainability outcomes of the Plan.
45. Performance against the monitoring indicators and delivery plan will be key factors in considering whether a review of the Plan is warranted, and therefore a specific trigger or trigger points have not been set. The Plan's Viability and Deliverability Study indicates that the opportunity sites are generally deliverable and viable.
46. As mentioned previously, housing delivery will be monitored in order to ensure that the Plan is effective and deliverable and I am satisfied that the Council has effective mechanisms for implementation, monitoring and review of the document. This would be principally through the AMR and future reviews of its local plan documents. Allocations in the Plan will be monitored on an annual basis to assess progress, a process which will run alongside the Council's identified housing trajectory.
47. Overall, there is sufficient flexibility in the submitted Plan and existing policies to allow development to come forward even in challenging economic circumstances. Individual elements of the delivery plan may not be implemented on time because delivery is dependent on third parties. This is not expected to prevent continuing sustainable development or progress towards the Plan's objectives. There is potential for other elements to come forward earlier and for proposals to come forward on, for example, windfall sites that have not been specifically identified in the Plan. Some modifications are proposed to the delivery plan section of the plan as a consequence of modifications to individual opportunity site policies. The modifications to the delivery plan are set out below in relation to the relevant opportunity sites.

Site Specific Policies

Are the detailed requirements for each of the allocations clear and justified? Have site constraints, development mix and viability considerations been adequately addressed? Are the boundaries and extent of the sites correctly defined?

48. The guidance accompanying each allocation provides sufficient clarity for landowners and potential developers and it highlights the key issues and

potential requirements and opportunities to be considered at the planning application stage. Site constraints have been adequately addressed in the Plan.

49. The Plan reflects the Council's approach towards mixed use development contained within CDP policy DP1. Where appropriate it acknowledges that a range of uses need to be balanced against each other in order to support viable and sustainable development and that housing is the priority land use in the CS. The Plan lacks detail in this regard, including the Council's approach to housing and the conversion of commercial buildings (in 'B' use-classes) to residential. **MM13** remedies this and in accordance with the Framework it seeks to promote the necessary flexibility to assist viable schemes in coming forward. This is necessary for the Plan to be justified and effective.
50. There are a number of opportunity sites within the Plan where the policy does not reflect CDP policy DP 31 which deals with the supply of open space. Similarly, there are a number of sites where the policy does not accurately reflect the aspirations of CDP policy DP1 which seeks to ensure that additional non-residential floorspace is matched by the same level of residential floorspace. These soundness issues are rectified by **MMs47 to 59** inclusive.
51. Since the Plan was drafted additional information has come forward from various organisations about anticipated timings for the release of some of the opportunity sites. Consequently **MMs62, 63, 64, 70, 74, 76, 77 & 78**, adjust the timings in the delivery plan section to reflect the most up to date information. These main modifications will ensure that the policies for these sites are effective.

Site 1: Astor College, 99 Charlotte Street

52. The 8 storey building on this site currently contains student halls of residence. To the rear of the building is an area of open space that is not currently accessible to the public. As submitted, the Plan promotes the redevelopment of this site with 1,600sqm of additional floorspace for an additional 100 units of student accommodation or potentially for self-contained housing. The inclusion of these precise figures make the policy insufficiently flexible and therefore ineffective, but this deficiency is addressed by **MMs60 & 66** which modify the policy to include the word 'potentially'. These modifications are necessary for the policy to be effective.

Site 2: Middlesex Hospital Annex

53. This site, which forms part of the 'Bedford passage' group of sites, contains a number of large 4 storey buildings erected in the late 18th and 19th centuries. The grade II listed building facing Cleveland Street is the former Strand Union Workhouse. The remaining buildings (former infirmary blocks) are not listed and were granted a Certificate of Immunity in June 2011. This is a legal guarantee that the named buildings will not be statutorily listed as being of special architectural or historic interest during the five years from the date on which the certificate is signed.

54. Given the previous use of this site as a hospital, a mixed use scheme is being promoted. This would consist predominantly of permanent self-contained housing, particularly affordable housing. This emphasis on housing and the removal of the requirement for medical / healthcare facilities is dealt with by **MMs48 & 73** which are necessary for the Plan to be effective. An historic s106 agreement in relation to development at the main University College Hospital secured 30 socially rented homes on this site and potentially a further 1425sqm of affordable housing. The Plan inaccurately states that deliverability is subject to University College Hospital's operational requirements, and this inaccuracy is remedied by **MM61**.
55. Greater flexibility in the master planning principles section of the Plan are necessary to allow for various scenarios in the future. **MMs45 & 46** advise that the buildings on this site could be re-used as well as the site re-developed. They also recognise that there is the potential for commercial uses at ground floor level with doors and windows onto Tottenham Street. Subject to the modifications, set out above, the policy for this site would be justified and effective.

Site 3: Arthur Stanley House

56. This site, which also forms part of the 'Bedford passage' group of sites, contains a large 8 storey building of limited architectural merit. The building is vacant, but was latterly used as an outpatient's hospital with ancillary offices and educational use. The Plan identifies it as having significant potential for redevelopment, but omits to reflect the conservation area appraisal's assessment of the building as a detractor because of its scale and bulk.
57. As with site 2, given the previous use of this site as a hospital, a mixed use scheme is being promoted. Since the Plan was written the needs of the NHS Trust have changed and there is no long term requirement for medical/healthcare facilities here, but the site may be required for short/medium term medical/healthcare uses in association with the reorganisation of other UCH sites. In line with the CS housing would be the preferred land use here and this along with the point about the conservation area appraisal is dealt with through **MM49** which is necessary for the Plan to be justified and effective.

Site 4: Tottenham Mews Day Hospital

58. This site, which forms part of the 'Bedford passage' group of sites, contains a dilapidated 2 storey building. The priorities for this site are to provide medical/healthcare facilities and to create a pedestrian link between Tottenham Mews and Bedford passage. A planning application for a new Community Mental Health Resource Centre here was submitted in 2012. The policy at present lacks flexibility over the amount of floorspace for medical / healthcare uses. It also omits to set out the requirement for any additional non-residential floorspace to be matched by an equal amount of residential floorspace and the requirement in relation to the provision of open space. These matters are rectified through **MMs50 & 75**. Subject to these main modifications the policy for this site would be justified and effective.

Site 7: Royal Ear Hospital, Huntley Street & Site 8: Medical Student's Union

59. These 2 sites are presented with one joint policy in the Plan and therefore I shall also consider them jointly. The former Royal Ear Hospital is occupied, but is not currently in clinical use. The Student's Union building is also occupied and contains offices and other ancillary support services linked to the University College Hospital.
60. The Plan expects the 2 sites to provide medical and health care uses. This assumes that the Medical Student's Union building falls within use class D1 (non-residential institution), because of the nature of its use and its relationship with the hospital and the university. I agree that this is a logical stance. In the event that this does not happen then the default position in the Plan is a mixed use development, including permanent self-contained housing and affordable housing. Since the site is close to housing and listed buildings it will be important that any future scheme here has regard to local living conditions and that appropriate building materials are used, but these matters are not currently covered by the policy. The Council have put forward **MM53** in order to rectify this matter. This is necessary for the Plan to be effective.

Site 9: Central Cross, Tottenham Court Road

61. The main building fronting Tottenham Court Road was originally built in the 1970s and contains shops on the ground floor and offices above. Behind it are buildings containing offices, studios and residential apartments. Planning permission has been granted in recent years for alterations and extensions here, but the Plan provides guidance in the event that the site is comprehensively redeveloped in the future. The preferred approach is for business, housing and retail uses to be retained.
62. The Plan omits to make reference to some relevant nearby conservation areas and the importance of considering views from some of these. These important matters would be remedied by the introduction of **MM54** and so subject to this modification the policy is justified and effective.

Site 10: 6-17 Tottenham Court Road

63. This modern part 3 storey/part 5 storey building is located on the corner of Tottenham Court Road and Hanway Street. It currently comprises retail, offices and a basement restaurant. The preferred use of any future building(s) here is retail with permanent self-contained housing, including affordable housing, as well as offices and community facilities.
64. This policy currently lacks flexibility and guidance in relation to design and so through **MMs55, 68 & 71** specific reference to offices and commercial uses is removed and the term 'a mix of uses' is introduced along with design advice in relation to this site and the sensitive places nearby. These main modifications are required to ensure that the policy is justified and effective.

Site 13: Network Building, 95 Tottenham Court Road

65. This site comprises a large 1950's steel and concrete 'C' shaped building that faces onto Tottenham Court Road, Whitfield Street and Howland Street. The

building is currently bisected by a single storey underpass (Cypress Place). The single carriageway public road leads to a servicing courtyard for this building and links Howland Street and Maple Street.

66. The policy refers to 'optimising' height and density which could be misleading and give the false impression that a very tall, large building would be appropriate here. **MM58** replaces this with 'make the maximum reasonable contribution'; thereby ensuring that the expectation of being able to construct a very large building here is tempered and more accurately reflects the Council's stance. There is also a lack of flexibility with regards to the additional floor space that could be provided and this is rectified through **MMs65, 69 & 72**. These main modifications are necessary for the policy to be justified and effective.

Site 14: 61-63 Tottenham Court Road, & 1-7 and 11-13 Goodge Street

67. It is intended that these sites, which form part of the shopping frontage of Tottenham Court Road and Goodge Street, will provide retail uses at ground floor with residential uses above. The boundary of the sites on the map for this site is incorrect. Also, the policy lacks flexibility in relation to public open space and omits to highlight that 1-3 and 11-13 Goodge Street are positive contributors to the conservation area, but all of these matters are rectified by **MM59**. Subject to this modification the policy for this site is justified and effective.

Assessment of Legal Compliance

68. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Fitzrovia Area Action Plan (the Plan) is identified within the approved revised LDS 2013 which sets out an expected adoption date of winter 2013. The content and timing of the Plan are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The revised SCI was adopted in July 2011 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (April 2013) sets out why AA is not necessary.
National Policy	The Plan complies with national policy except where indicated and modifications are recommended.
London Plan	The Plan is in general conformity with the London Plan except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

69. **The Plan has a number of deficiencies in relation to soundness for the reasons set out above, which means that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.**
70. **The Council has requested that I recommend main modifications to make the Plan sound and legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Fitzrovia Area Action Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.**

Louise Crosby

Inspector

This report is accompanied by the Appendix containing the Main Modifications, including the map modifications.

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission Plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1		Policies map	<p>Amend "Map 2: Proposed designations" in the submitted "Policies Map Changes" (FAAP6) to show:</p> <ul style="list-style-type: none"> • the northern boundary of the Plan area running along the back edge of the pavement on the south side of Euston Road; • the modified boundary of Opportunity Site 1 (shown as F1) incorporating the garden area between the rear elevation of Astor College and Opportunity Site 2; and • the modified boundary of Opportunity Site 14 (shown as F14) incorporating the single storey retail unit on the site of 7 Goodge Street. <p>(See the Map Modifications Appendix)</p>
MM2	6	Map	<p>Amend the map "Area covered by this Area Action Plan" to show the northern boundary of the Plan area running along the back edge of the pavement on the south side of Euston Road.</p> <p>(See the Map Modifications Appendix)</p>
MM3	6		<p>Amend the second bullet point on page 6 to read:</p> <p><i>"ensuring that growth takes place in a way that balances the need for residential, institutional and commercial uses and minimises harm to whilst supporting the residential community and its facilities and future needs and protecting and enhancing its amenity and quality of life."</i></p>
MM4	9	F1	<p>In Policy F1 on page 9 restore the model NPPF policy words omitted from the first paragraph and use more general wording in the second paragraph:</p> <p><i>"When considering development proposals within the boundary of the Fitzrovia Area Action Plan the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework; <u>It will always and will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social</u></i></p>

			<p><i>and environmental conditions in the area."</i></p>
MM5	12		<p>Amend and expand first paragraph on page 12 to read:</p> <p><i>"The Plan identifies a range of principles, opportunities to provide open space and public realm improvements, and potential development sites (opportunity sites). These will help deliver a range of benefits to Fitzrovia and meet a number of the objectives of Camden's Core Strategy, which are itemised in the Delivery Plan in Part 7 Delivery and Monitoring. <u>The and summarised in the following paragraphs indicate the potential contribution that could be made by the identified opportunity sites and measures, but do not attempt to quantify the total amount of development and facilities that could be delivered throughout the Plan area. The adopted development plan policies and the principles in this Plan will also be applied to other sites in the area to deliver additional housing, open space, community facilities and commercial space.</u>"</i></p> <p>On page 12 amend the paragraph under the subheading "Housing" to read:</p> <p><i>"The Plan aims to deliver additional self-contained homes including affordable housing, and a modest increase in student housing. <u>Subject to complying with the principles in this Plan and the relevant development plan policies, development of the identified opportunity sites could potentially provide Around 14,000 sqm of housing (over 400 200 additional self-contained homes) while Astor College has potential to provide plus around 100 additional student rooms.) could be provided across the opportunity sites. Sites expected to provide self-contained housing include among others the Middlesex Hospital Annex (Cleveland Street), 80 Charlotte Street and Asta House (55-65 Whitfield Street). Development plan mixed-use policies will also be applied to other sites in the Plan area to require permanent self-contained housing.</u>"</i></p> <p>On page 12 amend the paragraph under the subheading "Offices" to read:</p> <p><i>"<u>Subject to complying with the principles in this Plan and the relevant development plan policies, development of the identified opportunity sites could potentially provide around 10,000 sqm of new office floorspace could be provided in Fitzrovia, particularly including additional floorspace at the Network Building (95 Tottenham Court Road) and 80 Charlotte Street.</u>"</i></p>
MM6	13	Map	<p>Re-title the map to read "Area Action Plan Key Directions <u>Key Diagram</u>", and amend to show:</p> <ul style="list-style-type: none"> • the amended northern boundary of the Plan area; • the amended preferred land uses for Sites 2 and 3; and • the corrected boundary of private open space at Fitzroy Square.

			(See the Map Modifications Appendix).
MM7	20	Map	<p>Amend the map "Heritage Assets" to show:</p> <ul style="list-style-type: none"> • 52 Tottenham Street (immediately west of Arthur Stanley House) and as making a positive contribution to the character of the Charlotte Street Conservation Area; • other adjustments to properties in Percy Street, Colville Place, Goodge Street, Fitzroy Square, Grafton Mews and Warren Street for consistency with the Charlotte Street Conservation Area Appraisal and Management Plan and Fitzroy Square Conservation Area Appraisal and Management Strategy; • the amended northern boundary of the Plan area; and • the corrected boundary of private open space at Fitzroy Square. <p>(See the Map Modifications Appendix).</p>
MM8	21		<p>On page 21, amend the first sub-heading to read "<u><i>Balancing Securing residential facilities and amenity and the balance with commercial and institutional activity</i></u>", and amend the subsequent paragraph as follows:</p> <p><i>"Fitzrovia is home to a <u>considerable significant</u> residential population, including a significant proportion of students. The area also attracts a large influx of workers, students and visitors each day to its offices, academic institutions and shops, and in the evening to the bars, restaurants, cinema and other entertainment establishments. Workers, students and visitors are critical to the vitality and economic success of parts of the area. However, <u>these groups do not necessarily support the shops and services valued by longer term residents. Furthermore, high levels of activity, particularly in the evening, can be damaging to the amenity and quality of life of those living in Fitzrovia. This Plan aims to address the challenges of securing a balance between commercial/ institutional activity and the amenity of local residents, and of providing calmer streets and spaces along with active frontages and interesting streetscapes.</u></i>"</p>
MM9	21	Map	<p>Amend the map "Growth Areas" to indicate:</p> <ul style="list-style-type: none"> • that the Tottenham Court Road Growth Area extends slightly into the Plan area; • the amended northern boundary of the Plan area; and • the corrected boundary of private open space at Fitzroy Square. <p>(See the Map Modifications Appendix).</p>
MM10	24	Map	<p>Amend the map "Main roads and junctions" on page 24 to:</p> <ul style="list-style-type: none"> • delete the notations on Grafton Way; • replace "Two way working" on the key with "key West End Project public realm improvements"; • show the amended northern boundary of the Plan area; and • show the corrected boundary of private open space at Fitzroy Square.

			(See the Map Modifications Appendix).
MM11	26-27		<p>Amend the second bullet point objective in the box on page 26 to read:</p> <p><u>"supporting the residential community by providing a range of facilities, services and places that sustain and support local to meet residents' existing and future needs and protecting and enhancing residential amenity and quality of life;"</u></p> <p>Amend the first bold objective heading in the first column of page 27 to read:</p> <p><u>"Supporting the residential community by providing a range of facilities, services and places that sustain and support local to meet residents' existing and future needs and protecting and enhancing residential amenity and quality of life;"</u></p>
MM12	30		<p>Amend the bullet points on the first paragraph on page 30 to read:</p> <ul style="list-style-type: none"> • <u>"ensuring balancing growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses and addressing its addresses the impact of growth on residential amenity;</u> • <u>supporting the residential community by providing a range of facilities, services and places; and</u> • <u>ensuring an environmentally sustainable future."</u> <p>Add policies CS1 and DP1 to the list after the 2nd bullet point in the box on page 30.</p>
MM13	31	Land Use Principle 1	<p>Add the following opening statement to Land Use Principle 1:</p> <p><u>"The Council regards housing as the priority land use of the Local Development Framework".</u></p> <p>Amend the first bullet point of Land Use Principle 1 to read:</p> <p><u>"additional non-residential floorspace is matched wherever possible by an equal addition to floorspace for permanent self-contained housing (in Use Class C3), subject to relevant development plan policy criteria for mixed-use development, and..."</u></p> <p>Split the final paragraph on page 31 after the first sentence. Form a new first paragraph by extending the first sentence to read:</p> <p><u>"The Plan's objectives include supporting residential communities and achieving more housing and affordable housing. These objectives are consistent with the Camden Core Strategy 2010-2025, which states that the Council regards housing as the priority land-use of Camden's Local Development Framework. Camden's Core Strategy also indicates that the Council will seek a variety of housing types</u></p>

		<p><u>suitable for different groups. In pursuing the Area Action Plan's housing objectives, the Council will seek types of housing suitable for the groups identified in the Core Strategy, including families, people with mobility difficulties and older people".</u></p> <p>Make two amendments to the existing final paragraph on page 31.</p> <ul style="list-style-type: none"> Amend the current 2nd sentence to read: <i>"Thirteen Eleven of the the Plan's Opportunity Sites are potentially able to contribute to the development of additional self-contained homes."</i> Amend the current 4th sentence to read: <i>"Furthermore, the preferred use of up to five of these sites is may be developed primarily for medical or healthcare uses, which may prevent inclusion of new homes."</i> <p>Following the existing final paragraph on page 31, add a new paragraph as follows:</p> <p><u>"The National Planning Policy Framework (NPPF) indicates that in areas of housing need, councils should generally approve conversion of commercial buildings (in the B use classes) to housing, unless strong economic reasons would make this inappropriate. Principle 1 is consistent with the national policy. Many of the office premises in the Plan area were originally designed as homes, and residential conversion of some of these properties may be appropriate. In particular, many of the Listed townhouses surrounding Bedford Square are currently in business use. Some residential conversion in Bedford Square could have heritage and community safety benefits by securing the restoration of original features and increasing levels of activity and natural surveillance outside office hours. When considering proposals for conversion from business to residential use, the Council will have regard to relevant development plan policy criteria for retention of business use and Principle 4 of this Plan supporting small and medium enterprises."</u></p>
MM14	32-33	<p>Split the first paragraph on page 32 after "(achieves the full 50%)".</p> <p>Add the following before the remainder of the paragraph as follows:</p> <p><u>"The NPPF indicates that policies should seek development that creates an appropriate mix of uses. The NPPF also indicates that policies should seek mixed and balanced communities and secure any necessary affordable housing on the development site unless an off-site contribution can be robustly justified. The policies of the Camden Core Strategy</u></p>

		<p><u>2010-2025 and Camden Development Policies 2010 comply with the NPPF by seeking mixed-use development and creation of mixed and inclusive communities, and expecting on-site affordable housing contributions unless they cannot practically be achieved. To support the existing mixed-use character and mixed residential communities of Fitzrovia, Principle 1 and will seeks to ensure that permanent self-contained housing <u>and any affordable housing required is delivered on-site or nearby (ideally within 500 metres) within the Plan area. Where no alternative site is available...</u></u></p> <p>Amend the final complete paragraph on page 32 to read:</p> <p><u>"The types of affordable homes provided in Fitzrovia will be carefully assessed to ensure that they are genuinely affordable to the households that need them. High local house prices mean that cost of Intermediate housing including shared ownership homes will usually exceed the affordability limit should be affordable to households whose annual income is in the range set by out in the London Plan 2011 and subsequent London Plan Annual Monitoring Reports. Market rents are beyond the reach of many families in housing need. already exceed existing housing benefit caps in Fitzrovia, and from April 2013 it is likely that overall limits on benefits will mean many households are unable to afford as much as 50% of market rents. The Council will take these factors into account When seeking the maximum reasonable proportion of affordable housing, <u>and the Council will encourage the provision of social rented housing and genuinely affordable rented housing that costs no more than 80% of local market rent (including service charges where applicable) and give priority to family homes at or around the level of guideline target rents as resources and development viability permit. Camden Planning Guidance CPG2 Housing provides more details about how the Council will implement development plan policies for the types of affordable housing that the Council expects.</u>"</u></p> <p>On page 33 amend the final sentence of the first paragraph to read:</p> <p><u>"The accompanying Dwelling Size Priorities Table will not apply to 2-bedroom market homes in Fitzrovia, and the Council will not attach a high dwelling size priority to market homes with 3-bedrooms or more, a medium priority to those with 2-bedrooms and a lower priority to those with 1-bedroom the highest priority to 2-bedroom homes or aim for them to form 40% of new market home provision".</u></p> <p>On page 33 amend the line under the heading "Relevant Area Action Plan objectives" to read:</p> <p><u>"Contributes to the key objective <u>ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses addressing the</u></u></p>
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			impact of growth by supporting residential communities and achieving more, well designed affordable housing"
MM15	34-39	Land Use Principle 2	<p>Amend the first paragraph of Land Use Policy 2 to read:</p> <p><i>"The Council will expect development in Fitzrovia that increases the use of open space also to provide or support the provision of publicly accessible <u>new on-site public open space. Where on-site provision is not practical, public open space should be provided on an identified site in the vicinity. Provision should be made on-site wherever possible"</u></i></p> <p>At the end of the first paragraph on page 36, add:</p> <p><i><u>"CPG6 also sets out the distance threshold for different types of public open space. These distance thresholds should be used to guide the location of any off-site public open space provision"</u></i>.</p> <p>Add the following paragraph on page 36 after the final paragraph in column 1:</p> <p><i><u>"The scale of financial contributions included in Camden Planning Guidance CPG6 Amenity (adopted 2011) can make financial contributions a more attractive option for developers than making direct provision on or near the site. The Council is currently progressing towards introduction of a Camden Community Infrastructure Levy (CIL) and is also commencing a review of the Camden Core Strategy 2010-2025 and Camden Development Policies 2010. As part of this work we will review the appropriateness of the range and scale of infrastructure contributions secured through s106 planning obligations, including contributions to public open space"</u></i>.</p> <p>Amend 3rd bullet point on page 37 to read:</p> <p><i>"...this could be considered for unused parking spaces, forecourts and private gardens..."</i></p> <p>On page 39 amend the line under the heading "Relevant Area Action Plan objectives" to read:</p> <p><i><u>"Contributes to the key objective <u>supporting the residential community by providing a range of facilities, services and places by through supporting and enhancing community facilities and identifying opportunities to create new publicly accessible open spaces and green spaces"</u></u></i></p>
MM16	35	Map	<p>Amend the map "Public open spaces" to show the boundary of private open space at Fitzroy Square and show the amended northern boundary of the Plan area.</p> <p>(see the Map Modifications Appendix).</p>
MM17	41		<p>On page 41 amend the line under the heading "Relevant Area Action Plan objectives" to read:</p>

			<i>"Contributes to the key objective <u>supporting the residential community by providing a range of facilities, services and places</u> by <u>through</u> supporting and enhancing community facilities"</i>
MM18	43		<p>On page 43 amend the line under the heading "Relevant Area Action Plan objectives" to read:</p> <p><i>"Contributes to the key objective <u>ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses</u> addressing the impact of growth <u>by promoting small and medium scale businesses"</u></i></p>
MM19	47-49		<p>On page 47, after the final bullet point, insert text currently at the beginning of page 49, and amend the subsequent sentence as follows:</p> <p><i><u>"Proposals for food, drink and entertainment development anywhere in Fitzrovia will need to be considered under the full range of criteria in the Council's Development Policies, including cumulative impact on residential amenity (see Principle 9). Given the existing concentrations of food, drink and entertainment uses and the high residential density the potential for further development of this type in the Plan area is relatively limited. However, the The Central London Frontage on Tottenham Court Road and New Oxford Street is considered to offer the best opportunity some potential for new food, drink and entertainment uses, subject to compliance with all relevant development plan policy criteria and Principle 9 of this Plan in the Plan area. This frontage has direct access to... "</u></i></p> <p>Amend the first paragraph of page 49 as follows:</p> <p><i><u>"Proposals for food, drink and entertainment development anywhere in Fitzrovia will need to be considered under the full range of criteria in the Council's Development Policies, including cumulative impact on residential amenity (see Principle 9). Detailed guidance is provided Camden's Planning Guidance for Central London. When making planning decisions, the Council will have regard to all relevant development plan policy criteria, Principle 9 of this Plan, and the detailed guidance provided by Camden Planning Guidance CPG5 Town Centres, Retail and Employment. Camden We will also take account of the impact of the Seven Dials Special Policy Area and the West End Stress Area, particularly in connection with proposals for locations close to their boundaries, such as New Oxford Street and Charlotte Street. "</u></i></p> <p>On page 49 amend the line under the heading "Relevant Area Action Plan objectives" to read:</p> <p><i><u>"Contributes to the key objectives <u>ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses and supporting</u></u></i></p>

			<p><i><u>the residential community by providing a range of facilities, services and places through addressing the impact of growth by guiding commercial uses to the most appropriate locations; and promoting independent and specialist shops and supporting residential communities"</u></i></p>
MM20	50-52	Land Use Principle 6	<p>Amend Land Use Principle 6 to read as follows:</p> <p><i><u>"Large scale institutional uses should be located and designed to contribute to meeting the Plan's objectives and comply with relevant development plan policies. In particular they should maintain the mixed-use character of the area, support the residential community and its facilities and protect and enhance residential amenity and quality of life.</u></i></p> <p><i><u>Subject to relevant development plan policies, the Council will guide development of large scale institutions as follows:</u></i></p> <ul style="list-style-type: none"> • large scale <i>medical and healthcare uses to the vicinity of the University College Hospital building in Euston Road and to Opportunity Sites identified for medical or healthcare use;</i> • The Council will guide development of large scale <i>education and research uses to the area east of Tottenham Court Road and to the Howland Street Character Area."</i> <p>Amend the second sentence in the first paragraph of the second column on page 50 to read as follows:</p> <p><i><u>"However, the Core Strategy also indicates that development in Central London should contribute to strong and successful communities and support their facilities and future needs while protecting their amenity and the characteristics of local areas. and communities and contribute to strong and successful communities by protecting residential amenity and supporting community facilities."</u></i></p> <p>Amend the penultimate paragraph on page 50 to read:</p> <p><i><u>"This Plan's objectives include providing a range of facilities that support local resident needs and guiding institutional uses to the most appropriate locations. The Plan identifies seven <u>five</u> vacant and underused properties as Opportunity Sites for possible medical and healthcare development. Four of the sites are close to the main University College Hospital building (within the UCH and University Street Character Area identified in Part 5 of the Plan), including the Rosenheim Building and Royal Ear Hospital, both in Huntley Street. The UCLH NHS Trust owns these sites, and aspires to further focus its activities in this part of Fitzrovia."</u></i></p> <p>Amend the penultimate paragraph of page 51 to read:</p> <p><i><u>"There are three <u>is one</u> Opportunity Sites to the west of Tottenham Court Road that are <u>is</u> identified for possible medical and healthcare development, <u>and</u> which could also</u></i></p>

			<p><i>provide for a relatively large scale institutions. There are also two nearby sites with an established medical/ healthcare use. Taken together with the four Opportunity Sites close to University College Hospital, these are considered to provide sufficient capacity within the Plan area for large scale medical/ healthcare uses."</i></p> <p>On page 52 amend the line under the heading "Relevant Area Action Plan objectives" to read:</p> <p><i>"Contributes to the key objective <u>ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses</u> addressing the impact of growth by supporting residential communities, guiding institutional uses to the most appropriate locations and enhancing the relationship with the area's major institutions"</i></p>
MM21	54	Map	<p>Amend the map "Student Halls" to correct the boundary of private open space at Fitzroy Square and show the amended northern boundary of the Plan area.</p> <p>(See the Map Modifications Appendix)</p>
MM22	55		<p>On page 55 amend the line under the heading "Relevant Area Action Plan objectives" to read:</p> <p><i>"Contributes to the key objective <u>ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses</u> addressing the impact of growth by guiding institutional uses to the most appropriate locations"</i></p>
MM23	57		<p>Amend the final paragraph in the first column of page 57 to read:</p> <p><i>"The residential density and fine grained character of many parts of Fitzrovia, including areas to the rear of the Central London Frontage, makes them particularly vulnerable to harm from access arrangements, <u>particularly access by taxis and coaches</u>. Facilities for servicing and pick up should be sited and designed to minimise any adverse impacts. Given the high public transport accessibility of the area and the severe limitations on providing on-site pick up and set down, the Council will expect visitor accommodation to be accessed primarily by public transport and will seek to use planning conditions and/ or legal agreements to secure transport management plans. <u>The Council will expect transport management plans to control pick-up and set-down by taxis and coaches.</u>"</i></p> <p>On page 57 amend the line under the heading "Relevant Area Action Plan objectives" to read:</p> <p><i>"Contributes to the key objective <u>ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses</u> addressing the</i></p>

			<p>impact of growth by supporting residential communities and guiding commercial uses to the most appropriate locations"</p> <p>Add "Parking Addendum to Chapter 6 – paragraphs 6A.8 and 6A.9" to the list under the page 57 heading "Relevant parts of the London Plan".</p>
MM24	58-60		<p>Add a paragraph at the end of page 58 to read:</p> <p><u>"If a development involves installation of plant, ventilation or air conditioning/ extraction equipment, or will otherwise create significant noise, we will expect submission of a detailed acoustic and noise/ vibration report, as set out in Camden Planning Guidance CPG6 Amenity. We will not grant permission for plant, ventilation equipment or other activities that exceed the noise and vibration thresholds set out in Camden's development plan policies."</u></p> <p>On page 60 amend the line under the heading "Relevant Area Action Plan objectives" to read:</p> <p><u>"Contributes to the key objectives ensuring growth takes place in a way that strikes an appropriate balance between residential, institutional and commercial uses and supporting the residential community by providing a range of facilities, services and places and protecting and enhancing residential amenity and addressing the impact of growth through supporting residential communities by protecting amenity and improving quality of life"</u></p>
MM25	59	Map	<p>Amend the map "Residential addresses and flats per address" to correct the boundary of private open space at Fitzroy Square, show the amended northern boundary of the Plan area, and plot the latest address/ flat information from Camden's land and property gazetteer.</p> <p>(See the Map Modifications Appendix)</p>
MM26	61-64		<p>On page 61 amend the paragraph after Principle 10 to read:</p> <p><u>"The Core Strategy sets out how the Council tackles climate change through promoting higher environmental standards. It encourages all developments to meet the highest feasible environmental standards that are financially viable and requires all developments to take measures to minimise the effects of, and adapt to, climate change (policy CS13) including managing surface water run-off within all developments. It also promotes sustainable travel (policy CS11), flood prevention measures (policy CS13) and reducing air pollution (policy CS16). All developments in Fitzrovia will be assessed against the sustainability policies and guidance in the Core Strategy, Camden Development Policies 2010 and Camden Planning Guidance 3: Sustainability"</u>.</p> <p>On page 61 after Principle 10 and the subsequent paragraph, add the following sub-headings and paragraph:</p>

		<p><u>"Surface Water Flooding</u></p> <p><u>The key flood risk to Camden is from surface water flooding. Camden has produced detailed modelling of the surface water flood risk in the borough. In extreme rainfall events (1 in 75+) there is some ponding in Fitzrovia but less than in other parts of the borough. The Surface Water Management Plan identified the area as being part of a Critical Drainage Area Group (ref 3 005) where flood risk could arise, but neither the Surface Water Management Plan nor the Camden Flood Risk Management Strategy consider it an area of significant risk. The City of Westminster have also not identified the neighbouring area among its hotspots for further investigation. Nevertheless, it is vital that new developments are safe from flood risk and do not increase flood risk elsewhere. Developments should aim to decrease the amount of impervious surfacing on site and manage surface water run-off through the incorporation of sustainable urban drainage systems (SUDS) across the site.</u></p> <p><u>The energy hierarchy</u></p> <p><i>A key aspect of sustainability is the reduction of carbon emissions..."</i></p> <p>On page 64 under the heading "Relevant parts of Camden's Core Strategy and Development Policies" add:</p> <p><u>"Policy DP22 – Promoting sustainable design and construction Policy DP23 – Water Policy DP27 – Basements and lightwells"</u></p>
MM27	62	<p>Amend the map "Local energy networks" to correct the boundary of private open space at Fitzroy Square and show the amended northern boundary of the Plan area.</p> <p>(See the Map Modifications Appendix)</p>
MM28	68-70	<p>Amend the first principle on page 68 to read:</p> <p><i>"New development should respond <u>positively</u> to the prevailing form of nearby buildings and frontages in terms of scale and grain, particularly listed buildings, and buildings, <u>spaces, and other features</u> identified as making a positive contribution to the conservation area."</i></p> <p>Add a new sub-section on page 68 within the existing section "Built form and grain" to read as follows:</p> <p><u>"Tall Buildings</u></p> <p><u>Paragraph 24.10 of Camden Development Policies 2010 indicates that given Camden's strategic environmental characteristics, the entire borough is considered as being within the 'sensitive' category, as defined by the English Heritage/ CABE Guidance on Tall Buildings (2007). Tall</u></p>

building proposals anywhere in Camden will therefore merit detailed design assessments. Further guidance on assessing tall buildings is given in Camden Planning Guidance 1: Design (page 10).

There are a number of particular constraints on the development of tall buildings in the Plan area:

- Conservation Areas have been designated across most of the Plan area;
- two landmark viewing corridors cover a large proportion of the Plan area;
- few tall buildings currently exist in the Plan area (the most notable tall building is the BT Tower); and
- the Plan's urban design principles require development to respond positively to the prevailing form of nearby buildings in terms of scale.

Given these constraints, the Council considers that the potential for further tall buildings in the Plan area is very limited"

Add a further new sub-section on page 68 within the existing section "Built form and grain" to read as follows:

"Local views

Local views are a significant aspect of the area's character. The prevailing grid layout creates long views along streets which are enhanced in the Conservation Areas by the repeated elements of the terraced buildings. The layout and built form provide contrasting views of the formal frontages and the plainer backs of terraces. The squares provide the experience of transition from enclosure to open spaces. There are clear views of the BT Tower (36 storeys / 189m) throughout the area. However, the pattern of streets and spaces is not planned to create formal vistas to architectural set-piece buildings, and the topography is generally flat so there are no views gained from changes in level. The Conservation Area Management Plans set out detail on key views and vistas which should be considered in design proposals."

Under the heading "Street pattern/ links" on page 70, make the following two amendments.

1. At the end of the first paragraph add:

"These features can make the area attractive for travelling by foot, but can also make navigation difficult for visitors. In parts of the area Transport for London's "Legible London" project has provided on-street wayfinding specifically designed to assist pedestrians."

2. Add a third bullet point after the existing two principles to read:

"The public realm should include on-street wayfinding where

			<p><u>appropriate in the form of clear map-based information designed to enhance its setting, such as the 'Legible London' system."</u></p> <p>Amend the final Urban Design Principle on page 70 to read:</p> <p><u>"Development that increases the use of open space should provide new on-site public open space where possible. Where on-site provision is not practical, public open space should be provided on an identified site in the vicinity."</u></p>
MM29	69	Map	<p>Amend the map "Strategic viewing corridors" to correct the boundary of private open space at Fitzroy Square and show the amended northern boundary of the Plan area.</p> <p>(See the Map Modifications Appendix)</p>
MM30	71		<p>On page 71, after the second paragraph under the heading "Character areas, principles and public realm opportunities", reinstate the explanation of the character area boundaries as follows:</p> <p><u>"The margins of character areas do not have sharp boundaries. Inevitably, boundaries shown on a plan separate the opposite sides of a street, or separate buildings that are closely related to one another. Where proposals are close to a boundary or straddle the boundary, attention should be paid to character areas on each side of the boundary. This is particularly critical for Tottenham Court Road where pressure for growth can have profound impact on adjacent streets in sensitive character areas such as Bedford Square and Fitzroy Square."</u></p>
MM31	72	Map	<p>Amend the map "Character Areas" to:</p> <ul style="list-style-type: none"> • merge the Euston Road Character Area into the Fitzroy Square Character Area; • re-number Character Areas 6 to 11 as Character Areas 5 to 10; • show the west side of Huntley St (up to Capper Street) within the Ridgmount Gardens Character Area; • correct the boundary of private open space at Fitzroy Square; and • show the amended northern boundary of the Plan area. <p>(See the Map Modifications Appendix)</p>
MM32	73-74		<p>Add new paragraphs after the first paragraph on page 73, to begin with the final sentence of the first paragraph and read as follows:</p> <p><u>"North Crescent is occupied by the Eisenhower Centre which is the entrance to a second world war deep-level air raid shelter linked to the underground network. The structure is in commercial use for secure document storage. A memorial to the 12th County of London Regiment (The Rangers) is located in front of the Eisenhower Centre."</u></p> <p><u>The Eisenhower Centre has been identified as a positive</u></p>

			<p><u>contributor to the character of the Conservation Area due to its social and historic interest. However, the entrance structure blocks views of buildings in North Crescent (including listed buildings), creates a poor setting for the Rangers' memorial (also listed), and interrupts the symmetrical layout of Alfred Place and the North and South Crescents."</u></p> <p>Amend the first three paragraphs on page 74 and add an additional paragraph to read:</p> <p>"Character area principles</p> <p><u>1.1 New development fronting on Alfred Place should avoid or minimise vehicular servicing improve the frontage and pedestrian environment by minimising vehicle entrances and crossovers whilst maintaining adequate servicing arrangements to support the viable use of properties on the street to Alfred Place. This will facilitate creation of an open space and provide an area uninterrupted by crossovers or traffic.</u></p> <p>Public realm opportunities</p> <p><u>In this character area we will take forward the following public realm opportunities identified by the Fitzrovia Open Space and Public Realm Study. These potential schemes will require further investigation including prioritisation against other proposals, identification of funding, transport assessment, consultation with key stakeholders and wider public consultation.</u></p> <p>1.2 Alfred Place</p> <p><u>Create public open space by reclaiming carriageway space and moving car parking while maintaining adequate servicing arrangements to support the viable use of properties on Alfred Place. The priority is to remove minimise traffic and provide seating and planting to allow the space to be used create a better open environment without compromising the operational use of nearby buildings. Should further funding be secured a more considered design of the space should be undertaken which could include more costly interventions such as creation of a grassed area and relocating the cycle hire station.</u></p> <p><u>The Council encourages a scheme which will improve the setting of the Rangers' memorial and improve the relationship between the Eisenhower Centre and the surrounding townscape."</u></p>
MM33	77	Map	<p>Amend the map "Bedford Square Character Area" to include an additional Character Area Principle number "2.2" on the buff pedestrian area around Bedford Square Gardens.</p> <p>(See the Map Modifications Appendix)</p>
MM34	78		<p>Add a "Character area principle" on page 78 to read:</p> <p><u>"2.2 The Council will resist introduction of a cluttering of</u></p>

			<u>street furniture in the public area surrounding Bedford Square Gardens, but will explore opportunities for the installation of additional seating provided it will not harm the Square's heritage assets and their settings. The addition of seating will require further investigation including prioritisation against other proposals, identification of funding, consultation with key stakeholders and wider public consultation."</u>
MM35	84-85		Delete entire section (all material on page 84 and page 85)
MM36	87	Map	Amend the map "Fitzroy Square Character Area" to show the buildings on the southern side of Euston Road contained entirely within the Fitzroy Square Character Area. Re-number the notations for the "Character area principles" and "Public realm opportunities" to reflect the deletion of the Euston Road Character Area. (See the Map Modifications Appendix)
MM37	92		Amend the map "Howland Street Character Area" as shown on Map 5 in the Map Changes document to exclude properties on the western side of Charlotte Street south of Opportunity Site 1. (See the Map Modifications Appendix)
MM38	93-94		Add a list of Opportunity Sites on page 93 as follows: "Opportunity Sites 7 Royal Ear Hospital 8 Medical Students' Union" Add a Character Area Principle on page 94 matching Principle 11.3 on page 99 to read: "No character area principles have been identified for this area <u>8.1 Redevelopment on the block bounded by Tottenham Court Road, Torrington Place, Huntley Street and Capper Street should consider retention and extension the network of pedestrian laneways."</u> Re-number the Public realm opportunity from 9.1 to 8.2 to reflect the deletion of the Euston Road Character Area.
MM39	94	Map	Amend the map "Ridgmount Gardens Character Area" to: <ul style="list-style-type: none"> • show the west side of Huntley St (up to Capper Street) within the Ridgmount Gardens Character Area; • include Opportunity Sites 7 and 8; • include reference to a Character Area Principle 8.1 to the rear of Opportunity Sites 7 and 8; and • re-number the notation for the "Public realm opportunity" to 8.2 to reflect and the deletion of the Euston Road Character Area and the addition of Character area principle 8.1. (See the Map Modifications Appendix).

MM40	96-97		<p>On page 96, amend the second paragraph to read:</p> <p><i><u>"10.1 Any redevelopment 9.1 We will consider serving a discontinuance notice to seek removal of the advertising hoarding in front of the deep shelter entrance on Tottenham Court Road (located south of 80-85 Tottenham Court Road). Any redevelopment of the area between the American Church and 80-85 Tottenham Court Road should remove the advertising hoarding."</u></i></p> <p>Amend the paragraphs on page 97 under the heading "The South Square" to read:</p> <p><i>"A larger space is created in this location by the setback of the Met Building, which is then framed by projecting historic buildings to the north and south.</i></p> <p><i>The whole space should be treated as a single aesthetic element. To prioritise pedestrian use, the square should be raised, however the scheme should maintain adequate servicing arrangements to support the viable use of properties on Tottenham Court Road."</i></p>
MM41	99	Map	<p>Amend the map "UCH and University Street Character Area" to:</p> <ul style="list-style-type: none"> • remove the west side of Huntley St (up to Capper Street) from the UCH and University Street Chracter Area; • remove northern frontage of Torrington Place from the UCH and University Street Character Area; • remove the references to Opportunity Sites 7 and 8; • show an additional Character Area Principle number "10.4" on Grafton Way adjacent to Opportunity Sites 5 and 6; and • re-number the notations for the "Character area principles" as 10.1 to 10.3 and re-number the notations for the "Public realm opportunity" as 10.5 to reflect the deletion of the Euston Road Character Area and the addition of Character area principle 10.4. <p>(See the Map Modifications Appendix).</p>
MM42	99		<p>Renumber Character area principles 11.1 and 11.3 to principle 10.1 and 10.3 and amend principle 11.2 to read:</p> <p><i><u>"11.2 10.2 Development adjacent to Mortimer Market should be designed to address the space, for example with windows and entrances rather than blank facades and building services.</u></i></p> <p><i>Redevelopment of the Mortimer Market Centre should explore reorienting the building to create a perimeter block with a courtyard or pocket park space in the centre of the city block alongside Mortimer Market.</i></p> <p><i><u>It is acknowledged that windows addressing a public courtyard or park may not be appropriate for certain medical/healthcare uses providing treatment facilities."</u></i></p>

			<p>Add a further "Character area principle" on page 99 to read:</p> <p><u>"10.4 Development adjacent to Grafton Way and works to Grafton Way associated with the West End Project should seek to improve the relationship between the buildings and the street, ease pedestrian movements and improve the pedestrian environment. Wider footways, landscaping and tree planting should be considered where appropriate. See also further details of the West End Project on page 96 and Masterplanning principles for the Grafton Way sites on pages 117 to 118."</u></p>
MM43	101	Map	<p>Amend the map "Combined character area principles and public realm proposals" to:</p> <ul style="list-style-type: none"> • include an additional Character Area Principle number "2.2" on the buff pedestrian area around Bedford Square Gardens; • re-number all notations from 6.1 onwards to reflect deletion of the Euston Road Character Area; • show an additional Character Area Principle number "8.1" on Huntley Street adjacent to Opportunity Sites 7 and 8; • re-number the notation for the Ridgmount Gardens Character Area "Public realm opportunity" (Chenies Street East) to 8.2; • show an additional Character Area Principle number "10.4" on Grafton Way adjacent to Opportunity Sites 5 and 6; • re-number the notation for the UCH and University Street Character Area "Public realm opportunity" (Mortimer Market Highway) to 10.5; • correct the boundary of private open space at Fitzroy Square; and • show the amended northern boundary of the Plan area. <p>(See the Map Modifications Appendix).</p>
MM44	105	Map	<p>Amend the map "Opportunity sites" to:</p> <ul style="list-style-type: none"> • correct the boundary of Opportunity Site 14 to include 61 Tottenham Court Road and the single storey retail building on the site of 7 Goodge Street; • correct the boundary of private open space at Fitzroy Square; and • show the amended northern boundary of the Plan area. <p>(See the Map Modifications Appendix).</p>
MM45	106		<p>Amend the first bullet point/ masterplanning principle on page 106 to read:</p> <p><u>"Development or re-use of buildings around the listed Middlesex Hospital Annex / former Strand Union Workhouse should be sensitively designed and provide a complimentary setting to the listed building in terms of scale, height, form and architectural detailing (1). Buildings which contribute positively to the setting of the listed building should be considered for retention."</u></p>
MM46	107	Map	<p>Amend the map "Bedford Passage illustration of principles" as</p>

			<p>shown on Map 9 in the Map Changes document to show the outline of existing buildings at the Middlesex Hospital Annex that could potentially be retained.</p> <p>(See the Map Modifications Appendix)</p>
MM47	108-109	Opportunity Site 1	<p>Amend the map for Opportunity Site 1. Astor College on page 108 to incorporate the garden area between the rear elevation of Astor College and the eastern boundary of Opportunity Site 2 (Middlesex Hospital Annex).</p> <p>(See the Map Modifications Appendix).</p> <p>Amend the last sentence of the opening page 108 paragraph to read:</p> <p><i><u>"Redevelopment could potentially provide around 1,600sqm of additional student housing, subject to complying with the following development principles."</u></i></p> <p>Insert an additional bullet point on page 108 immediately after the heading "Public Open Space" and amend the subsequent bullet point to read:</p> <ul style="list-style-type: none"> <i><u>"• Development that increases the use of open space should provide new on-site public open space. Where on-site provision is not practical, public open space should be provided in association with the Middlesex Hospital Annex/ Bedford Passage or on an identified site in the vicinity.</u></i> <i><u>• Development should be considered as a comprehensive 'city block' with each opportunity site providing a share of potential to provide a significant area of public open space, as set out within the masterplanning principles above."</u></i> <p>Add policies CS15 and DP31 to the list on page 109 under the heading "Relevant LDF policies".</p>
MM48	110-111	Opportunity Site 2	<p>On page 110, amend the introductory text as follows:</p> <p><i><u>"The Middlesex Hospital Annex forms a key element of the Bedford Passage group of sites and applicants should explore opportunities for a comprehensive 'city block' redevelopment with adjacent landowners. The priorities priority for this site are is to deliver a mixed-use scheme with medical/healthcare facilities and housing including affordable housing. This site should also provide public open space and preserve the listed building, in accordance with the masterplanning principles."</u></i></p> <p>Add text at the end of introductory section on p.110 to read:</p> <p><i><u>"Buildings which contribute positively to the setting of the listed building should be considered for retention."</u></i></p>

On page 110, amend the bullet points and add a new bullet point under the heading "Land use" to read:

"Land Use

- *The Council expects a mixed-use scheme on this site, to be used predominantly including medical / healthcare facilities and for permanent self-contained housing, particularly affordable housing. Small scale commercial uses to reflect the character of the area may be suitable at ground floor level.*
- ~~*If medical / healthcare uses are not required, the Council will expect the predominant use to be housing.*~~
- *Development will be subject to the obligations set out in the UCH s106 agreement of July 2004 (parent permission no. PS9604299). To meet an obligation of the agreement, this site has been nominated to deliver at least 30 social rented homes and potentially a further 1425 sq m of affordable housing (in addition to any policy requirements that may arise from other development proposed on the site). The agreement also contains a number of obligations that are not related to this site, including provision of a centre for independent living and a mental health resource centre.*
- *The established use of the site is medical / healthcare use and this use could continue subject to the s106 housing obligations referred to above being met.*

Insert an additional bullet point on page 110 immediately after the heading "Public Open Space" and amend the subsequent bullet point to read:

- *Development that increases the use of open space should provide new on-site public open space. Where on-site provision is not practical, public open space should be provided on an identified site in the vicinity.*
- *Development should be considered as a comprehensive 'city block' with each opportunity site providing a share of potential to provide a significant area of public open space, as set out within the masterplanning principles above.*

Add text at the end of 2nd bullet point under 'design' on page 111 to read:

"Buildings which contribute positively to the setting of the listed building should be considered for retention."

Add policies CS1, CS15, DP1 and DP31 to the list on page 111 under the heading "Relevant LDF policies".

MM49	112-113	Opportunity Site 3	<p>On page 112, amend the preamble as follows:</p> <p><i>"The priorities for Arthur Stanley House are to <u>maintain medical / healthcare uses if required and provide housing including affordable housing</u> medical/ healthcare uses, and for development to make a contribution towards the creation of public open space in association with the Middlesex Hospital Annex/ Bedford Passage."</i></p> <p>On page 112, amend the bullet points under the heading "Land use" to read as follows:</p> <p>"Land Use</p> <ul style="list-style-type: none"> • The Council's preferred land use for this site is medical/ healthcare use. • <i>If <u>the established medical / healthcare uses are not required</u>, the €Council will expect permanent self-contained homes to be provided, including an appropriate contribution to affordable housing. <u>Commercial uses to reflect the character of the area may be suitable at ground floor level, with active uses or windows and entrances facing onto Tottenham Street.</u>"</i> <p>On page 112 after the heading "Public Open Space" amend the bullet points to read:</p> <ul style="list-style-type: none"> • <i>"Development should contribute to <u>that increases the use of open space should provide new on-site public open space provision in the area.</u></i> • <i><u>Where on-site public open space provision is not practical, public open space should be provided in association with the Middlesex Hospital Annex/ Bedford Passage, or on an identified site in the vicinity.</u></i> • <i>The site should contribute towards the creation of public open space in association with the Middlesex Hospital Annex/ Bedford Passage.</i> • <i>Development should be set back from Tottenham Mews to provide better sightlines from Tottenham Street into the mews and to improve personal safety and create public space."</i> <p>On page 112 add the following sentence at the end of the first bullet point after the heading "Design":</p> <p><i><u>"Arthur Stanley House is currently identified as a detractor in the conservation area appraisal as a result of its scale and bulk."</u></i></p> <p>Add policies CS1, CS15, DP1 and DP31 to the list on page 113 under the heading "Relevant LDF policies".</p>
MM50	114-115	Opportunity Site 4	<p>Amend the last sentence of the opening para on page 114 paragraph to read:</p> <p><i>"Redevelopment could <u>potentially</u> provide around 1,400sqm</i></p>

			<p><i>of additional medical / healthcare floorspace, subject to complying with the following development principles."</i></p> <p>Insert additional bullet point under the heading 'Land Use' on page 114:</p> <p><u><i>"Any additional non-residential floorspace should be matched by an equal addition to floorspace for permanent self-contained housing (in Use Class C3), subject to relevant development plan policy criteria for mixed-use development."</i></u></p> <p>Amend 'Public Open Space' section on page 114 to read:</p> <ul style="list-style-type: none"> • <i>"Development should contribute to that increases the use of open space should provide new on-site public open space provision in the area.</i> • <i><u>On-site public open space is not likely to be practical given the constraints of the site.</u></i> • <i><u>Where on-site public open space provision is not practical, development should provide improved permeability and contribute towards the creation of public open space between Tottenham Mews and the Middlesex Hospital Annex / Bedford Passage / Cleveland Street, or on an identified site in the vicinity."</u></i> <p>Add policies CS1, CS15, DP1 and DP31 to the list on page 115 under the heading "Relevant LDF policies".</p>
MM51	118-119	Opportunity Site 5	<p>On page 118 add a fourth bullet point after the heading "Land use" to read:</p> <p><u><i>"Any additional non-residential floorspace should be matched by an equal addition to floorspace for permanent self-contained housing (in Use Class C3), subject to relevant development plan policy criteria for mixed-use development."</i></u></p> <p>Amend the bullet point on page 118 immediately after the heading "Public Open Space" to read:</p> <p><i>"Development should contribute to public open space provision. Development that increases the use of open space should provide new on-site public open space. Where on-site provision is not practical, public open space should be provided on an identified site in the vicinity."</i></p> <p>Add policies CS1, CS15, DP1 and DP31 to the list on page 119 under the heading "Relevant LDF policies".</p>
MM52	120-121	Opportunity Site 6	<p>On page 120 insert an additional bullet point after the fourth bullet point under the heading "Land use" to read:</p> <p><u><i>"Any additional non-residential floorspace should be matched by an equal addition to floorspace for permanent self-contained housing (in Use Class C3), subject to relevant development plan policy criteria for mixed-use development."</i></u></p>

			<p>Amend the bullet point on page 120 immediately after the heading "Public Open Space" to read:</p> <p><i>"Development should contribute to public open space provision in the area. The council would expect this to be provided on site, although where the proposed medical/healthcare uses are not compatible with on-site provision, contributions will be sought for public open space provision nearby. Development that increases the use of open space should provide new on-site public open space. Where on-site provision is not practical, public open space should be provided on an identified site in the vicinity."</i></p> <p>Add policies CS1, CS15, DP1 and DP31 to the list on page 121 under the heading "Relevant LDF policies".</p>
MM53	125-126	Opportunity Sites 7-8	<p>Amend the last sentence of the opening paragraph page 125 paragraph to read:</p> <p><i>"Redevelopment of the Medical Student's <u>Students' Union</u> could <u>potentially</u> provide around 2,600sqm of additional floorspace, subject to complying with the following development principles."</i></p> <p>On page 125 insert a third bullet point under the heading "Land use" to read:</p> <p><i>"Any additional non-residential floorspace should be matched by an equal addition to floorspace for permanent self-contained housing (in Use Class C3), subject to relevant development plan policy criteria for mixed-use development."</i></p> <p>Amend the bullet point on page 125 immediately after the heading "Public Open Space" to read:</p> <p><i>"Development should contribute to public open space provision in the area, and this should be on-site where possible. Development that increases the use of open space should provide new on-site public open space. Where on-site provision is not practical, public open space should be provided on an identified site in the vicinity."</i></p> <p>Add additional bullet points to the section headed "Design" on page 125 to state:</p> <ul style="list-style-type: none"> <i>"• Development should not cause harm to the residential amenity of the occupiers of nearby buildings (see also Principle 9 Residential Amenity). In addition, appropriate measures should also be taken to minimise impact on the amenity of the residential block adjoining Site 8 with regard to structure-borne noise and vibration."</i> <i>• Development should minimise loss of natural light and maintain adequate daylight and sunlight to properties on the east side of Huntley Street."</i>

			<ul style="list-style-type: none"> <u>Development should use materials which are sensitive to the nearby listed buildings in terms of tone, colour, texture and finishes.</u> <p>Under the heading "Site Contexts" on page 125, in the first sentence and the fifth sentence, replace "University Street Character Area" with "<u>Ridgmount Gardens Character Area</u>".</p> <p>Add policies CS1, CS15, DP1 and DP31 to the list on page 126 under the heading "Relevant LDF policies".</p>
MM54	129-130	Opportunity Site 9	<p>Amend the second bullet point on page 129 under the heading "Land use" to read:</p> <p><u>"Any where additional non-residential floorspace is proposed, the Council will seek a matching amount of should be matched by an equal addition to floorspace for permanent self-contained housing (in Use Class C3), subject to relevant development plan policy criteria for mixed-use development, including an appropriate contribution to affordable housing."</u></p> <p>Amend the bullet point on page 129 immediately after the heading "Public Open Space" to read:</p> <p><u>"Development should contribute to public open space provision in the area, and this should be on-site where possible. Development that increases the use of open space should provide new on-site public open space. Where on-site provision is not practical, public open space should be provided on an identified site in the vicinity."</u></p> <p>Re-word 2nd and 4th bullet point on page 130 under the heading "Design". Second bullet point to read:</p> <p><u>"Development which causes harm to the character and appearance of the <u>Bloomsbury, Charlotte Street or Hanway Street conservation areas, or other nearby conservation areas in the City of Westminster,</u> will not be permitted."</u></p> <p>Fourth bullet point to read:</p> <p><u>"Development should reduce the impact of this site on views from Bedford Square and nearby conservation areas in Camden and the City of Westminster and be of a height which does not harm the viewing corridor from Parliament Hill to the Palace of Westminster."</u></p> <p>Add policies CS1, CS15 and DP31 to the list on page 130 under the heading "Relevant LDF policies"</p>
MM55	132-133	Opportunity Site 10	<p>Amend the last sentence of the opening paragraph on page 132 to read:</p> <p><u>"Redevelopment could potentially provide around 3,000sqm of additional floorspace, subject to complying with the</u></p>

			<p><u>following development principles."</u></p> <p>Amend the two bullet points on page 132 immediately after the heading "Land use" to read:</p> <ul style="list-style-type: none"> <i>"• <u>The Council's preferred approach is a mix of uses with a retention of retail uses frontage on the Tottenham Court Road frontage and provision of permanent self-contained housing, including an appropriate contribution to affordable housing.</u></i> <i>• <u>Any additional non-residential floorspace should be matched by an equal addition to floorspace for permanent self-contained housing (in Use Class C3), subject to relevant development plan policy criteria for mixed-use development. Offices and community facilities will also be welcome on this site.</u></i> <p>Amend the first bullet point on page 132 immediately after the heading "Public open space and public realm" to read:</p> <p><i><u>"Development should contribute to public open space provision in the area, and this should be on-site where possible. Development that increases the use of open space should provide new on-site public open space. Where on-site provision is not practical, public open space should be provided on an identified site in the vicinity."</u></i></p> <p>Re-word 1st bullet point on page 132 under 'design' to read:</p> <p><i><u>"Whilst there is potential for additional capacity on this site, the scale, height and design of development should avoid harm to the view from Bedford Square, seek to preserve and enhance the character and appearance of the Bloomsbury, Charlotte Street and Hanway Street conservation areas and nearby conservation areas in the City of Westminster and protect local amenity."</u></i></p> <p>Add policies CS1, CS15, DP1 and DP31 to the list on page 133 under the heading "Relevant LDF policies".</p>
MM56	134-135	Opportunity Site 11	<p>Amend the second bullet point on page 134 after the heading "Land use" to read:</p> <p><i><u>"Any Where additional non-residential floorspace is proposed, the Council will seek a matching amount of should be matched by an equal addition to floorspace for permanent self-contained housing (in Use Class C3), subject to relevant development plan policy criteria for mixed-use development on site, including an appropriate contribution to affordable housing."</u></i></p> <p>Amend the bullet points on page 134 after the heading "Public Open Space" to read:</p> <ul style="list-style-type: none"> <i>• <u>"Development should contribute to public open space</u></i>

			<p>provision on-site. Development that increases the use of open space should provide new on-site public open space. The public open space contribution should be sufficient to meet the demands created by the development, therefore a larger space is expected than that contained within the approved scheme.</p> <ul style="list-style-type: none"> • On-site provision of public open space is considered to be practical given the scale of the site and footprint of the buildings. • Where on-site provision is not practical, public open space should be provided on an identified site in the vicinity. • Applicants should seek opportunities to provide publicly accessible open space within the central courtyard and at roof level." <p>Add policies CS1, CS15 and DP31 to the list on page 135 under the heading "Relevant LDF policies".</p>
MM57	136-137	Opportunity Site 12	<p>Amend the second bullet point on page 136 after the heading "Land use" to read:</p> <p>"Any Where additional non-residential floorspace is proposed, the Council will seek a matching amount of should be matched by an equal addition to floorspace for permanent self-contained housing (in Use Class C3), subject to relevant development plan policy criteria for mixed-use development on-site, including an appropriate contribution to affordable housing."</p> <p>Amend the bullet points on page 136 after the heading "Public Open Space" to read:</p> <ul style="list-style-type: none"> • "Development should contribute to public open space provision in the area. Development that increases the use of open space should provide new on-site public open space. The public open space contribution should be sufficient to meet the demands created by the development. • Where on-site public open space provision is not practical, public open space should be provided in association with 80 Charlotte Street (Site 11), or on an identified site in the vicinity." <p>Add policies CS1, CS15 and DP31 to the list on page 137 under the heading "Relevant LDF policies".</p>
MM58	138-139	Opportunity Site 13	<p>Amend the last sentence of the opening paragraph to read:</p> <p>"Redevelopment could potentially provide around 5,500sqm of additional floorspace, subject to complying with the following development principles."</p> <p>Amend the second bullet point on page 138 after the heading "Land use" to read:</p> <p>"Any Where additional non-residential floorspace is proposed,</p>

			<p>the Council will seek a matching amount of should be matched by an equal addition to floorspace for permanent self-contained housing (in Use Class C3), subject to relevant development plan policy criteria for mixed-use development, including an appropriate contribution to affordable housing.</p> <p>Amend the bullet points on page 138 after the heading "Public Open Space" to read:</p> <ul style="list-style-type: none"> • "Development should provide public open space that will be available to pedestrians along Tottenham Court Road and Howland Street, potentially provided by setbacks <u>Development that increases the use of open space should provide new on-site public open space.</u> • <u>On-site provision of public open space is considered to be practical given the scale of this site and footprint of the buildings.</u> • <u>Where on-site provision is not practical, public open space should be provided on an identified site in the vicinity.</u> • <u>Development should retain Cypress Place, the mews running north-south through the centre of the site.</u> • <u>Applicants should identify opportunities to significantly improve the local pedestrian environment along Howland Street."</u> <p>Amend the first bullet point on page 138 immediately after the heading "Design" to read:</p> <p>"Development should optimise height and density in the central London area <u>make the maximum reasonable contribution to additional business space and housing whilst respecting the surrounding context and will be required to maintain active shopfronts along Tottenham Court Road."</u></p> <p>Add policies CS1, CS15 and DP31 to the list on page 139 under the heading "Relevant LDF policies".</p>
MM59	140-141	Opportunity Site 14	<p>Amend the map for Opportunity Site 14. 61-63 Tottenham Court Road & 1-7 and 11-13 Goodge Street on page 140 to correct the site boundary to incorporate the single storey retail unit on the site of 7 Goodge Street.</p> <p>(See the Map Modifications Appendix).</p> <p>Amend the last sentence of the opening paragraph to read:</p> <p>"Redevelopment could potentially provide around 1,000sqm of additional floorspace, subject to complying with the following development principles."</p> <p>Amend 'Public Open Space' section on page 140 to read:</p> <ul style="list-style-type: none"> • "Development that increases the use of open space should provide new on-site public open space should contribute to an excellent public realm."

			<ul style="list-style-type: none"> <u>On-site public open space is not likely to be practical given the constraints of the site. Where on-site public open space provision is not practical, public open space should be provided on an identified site in the vicinity.</u> <p>Insert additional bullet point under 'Design':</p> <p><u>"1-3 and 11-13 Goodge Street are identified as 'Positive Contributors' to the conservation area and so there will be a presumption in favour of retaining the buildings."</u></p> <p>Add policies CS1, CS15 and DP31 to the list on page 141 under the heading "Relevant LDF policies"</p>
MM60	148		<p>Reword 'Notes' for Astor College on page 148 to read:</p> <p><u>"Redevelopment could potentially provide around 1,600sqm of additional floorspace, an element of which could include housing."</u></p>
MM61	148		<p>Reword 'Details' for Middlesex Hospital Annex on page 148 to read:</p> <p><u>"Housing is expected as part of a mixed-use scheme, including medical / healthcare facilities. Housing is expected to be the predominant use on this site."</u></p> <p>Reword 'Notes' for Middlesex Hospital Annex on page 148 to read:</p> <p><u>"A s106 obligation – related to the main UCH site – was agreed to deliver at least 30 socially rented homes on this site and potentially a further 1425 sq m of affordable housing. Deliverability subject to UCH's operational requirements and the level of affordable housing required"</u></p>
MM62	148		<p>Reword 'Details' for Arthur Stanley House on page 148 to read:</p> <p><u>"Housing is the landowner's alternative option as medical / healthcare uses are the Council's preferred land use for this site. Housing is expected on this site as no long term requirement for the established medical / healthcare uses has been identified."</u></p> <p>Reword 'Notes' for Arthur Stanley House on page 148 to read:</p> <p><u>"Redevelopment is likely to be a longer-term project unless the scheme is identified in UCH capital investment plan, or the building is deemed to be surplus to operational requirements. This site may be needed for short / medium-term medical / healthcare use in association with the reorganisation of other UCH landholdings and facilities."</u></p>
MM63	148-149		<p>On pages 148 and 149 amend the 'Notes' for the Rosenheim Building and Odeon Site to refer to <u>"Proton Beam Therapy"</u></p>

			rather than "Pheton", and reword 'Timescale' to read <i>"Medium Long term (if for housing)"</i> .
MM64	149		<p>Reword 'Timescale' for Royal Ear Hospital and Medical Students' Union on page 149 to read: <i>"Medium Long term (if for housing)"</i></p> <p>Reword 'Notes' for Royal Ear Hospital on page 149 to read: <i>"Timing of the development is dependent on the plans and programmes of UGH This site is likely to come forward for medical / healthcare uses in the medium term."</i></p> <p>Reword 'Notes' for Medical Students' Union on page 149 to read: <i>"Timing of the development is dependent on the plans and programmes of UCH. Redevelopment of the site could provide approximately 2,600 sqm of additional floorspace, an element of which could include housing. This site is likely to come forward for medical / healthcare uses in the medium term."</i></p>
MM65	150		<p>Reword 'Notes' for Network Building on page 150 to read: <i>"Redevelopment could <u>potentially</u> provide approximately 5,500sqm of additional floorspace, an element of which could include housing."</i></p>
MM66	150		<p>Reword 'Notes' for Astor College on page 151 to read: <i>"Redevelopment could <u>potentially</u> provide around 1,600sqm of additional floorspace."</i></p>
MM67	151		<p>Reword the first and second sentence of 'Details' for Alfred Place on page 151 to read: <i>"Reduce <u>Create public open space by reclaiming carriageway space and move moving car parking to create public open space while maintaining adequate servicing arrangements to support the viable use of properties on Alfred Place. The priority is to remove minimise traffic and provide seating and planting to allow the space to be used create a better open environment without compromising the operational use of nearby buildings.</u>"</i></p>
MM68	156		<p>Reword the first sentence of 'Notes' for 6-17 Tottenham Court Road on page 156 to read: <i>"Redevelopment could <u>potentially</u> provide around 3,000sqm of additional floorspace, of which an element could be retail."</i></p>
MM69	157		<p>Reword the first sentence of 'Notes' for the Network Building on page 156 to read: <i>"Redevelopment could <u>potentially</u> provide approximately 5,500sqm of additional floorspace, an element of which could be retail."</i></p>
MM70	158		On pages 158 amend the 'Notes' for the Odeon Site to refer

			to " <u>Proton Beam Therapy</u> " rather than " Photon ", and reword 'Timescale' to read " Medium/ <u>Long term (if for a scheme including offices)</u> ".
MM71	158		Delete 6-17 Tottenham Court Road from 'Offices' section to reflect changes to Land use principles.
MM72	158		Reword the first sentence of 'Notes' for the Network Building on page 158 to read: <i>"Redevelopment could <u>potentially</u> provide approximately 5,500sqm of additional floorspace, an element of which could be in office use."</i>
MM73	159		Delete Middlesex Hospital Annex row on page 159.
MM74	159		Reword 'Details' for Arthur Stanley House on page 159 to read: <i>"Medical / healthcare uses are the Council's preferred land use for this site</i> <i><u>Medical / healthcare uses are the established use on this site but are not expected to be required in the long term."</u></i> Reword 'timescale' for Arthur Stanley House on page 159 to read: <i>"Short / Mmedium/long term (if for medical / healthcare uses)"</i> Reword 'Notes' for Arthur Stanley House on page 159 to read: <i>"Redevelopment is likely to be a longer-term project unless the scheme is identified in UCLH capital investment plan. No long term requirement for the established medical / healthcare use has been identified. However, this use may be needed in the short / medium term in association with the reorganisation of other UCH landholdings and facilities."</i>
MM75	159		Reword 'Notes' for Tottenham Mews Day Hospital on page 159 to read: <i>"Redevelopment could <u>potentially</u> provide approximately 1,400sqm of additional <u>medical/ healthcare</u> floorspace."</i>
MM76	159		On page 159 amend the 'Notes' for the Rosenheim Building to read: <i>"This site is likely to come forward for medical uses in the medium term as UCLH are developing plans for redevelopment of the site for medical uses</i> <i><u>UCH are planning to redevelop the site in association with the establishment of a Proton Beam Therapy Centre."</u></i>
MM77	160		On page 160 amend the 'Notes' for the Odeon Site to read: <i>"Redevelopment of the site relies on the current plans for the Photon Beam Therapy Centre to come forward. This site is likely to come forward for medical uses in the medium term</i>

			<u>as UCH are planning to redevelop the site in association with the establishment of a Proton Beam Therapy Centre.</u>
MM78	160		<p>Reword 'Timescale' for Royal Ear Hospital and Medical Students' Union on page 160 to read: <i>"Medium Long term"</i></p> <p>Reword 'Notes' for Royal Ear Hospital on page 160 to read: <i>"Timing of the development is dependent on the plans and programmes of UCH. This site is likely to come forward for medical uses in the medium term."</i></p> <p>Reword 'Notes' for Medical Students' Union on page 160 to read: <i>"Timing of the development is dependent on the plans and programmes of UCH. This site is likely to come forward for medical uses in the medium term. Redevelopment of the site could <u>potentially</u> provide approximately 2,600sqm of additional floorspace."</i></p>

Map Modifications Appendix

Main Modification 1 – *map originally published in a separate Policies Map Changes document*

Amend "Map 2: Proposed designations" in the submitted "Policies Map Changes" (FAAP6) to show:

- the northern boundary of the Plan area running along the back edge of the pavement on the south side of Euston Road;
- the modified boundary of Opportunity Site 1 (shown as F1) incorporating the garden area to the rear of Astor College; and
- the modified boundary of Opportunity Site 14 (shown as F14) incorporating the single storey retail unit on the site of 7 Goodge Street.

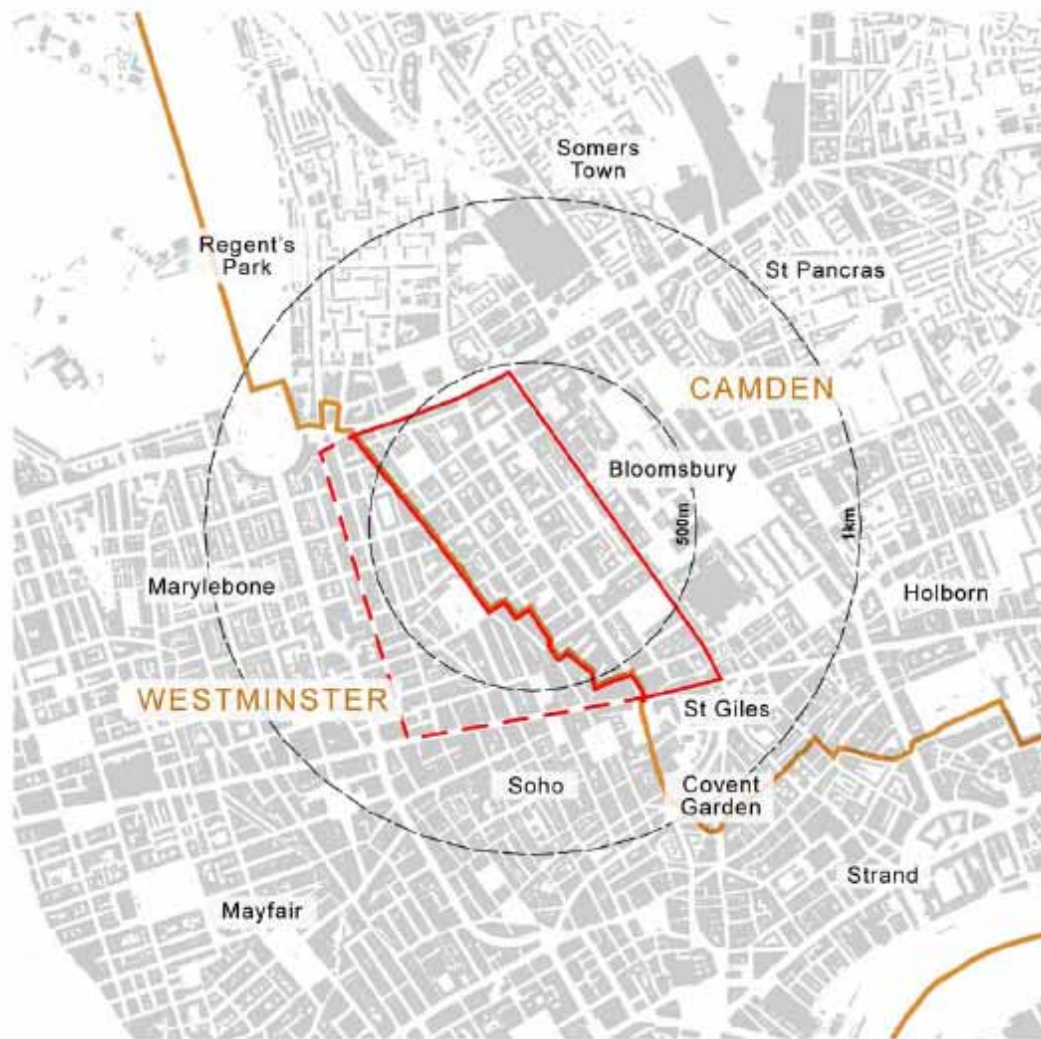
(See next page)






Main Modification 2 – *Proposed Submission Plan page 6*

Amend the map "Area covered by this Area Action Plan" to show the northern boundary of the Plan area running along the back edge of the pavement on the south side of Euston Road.

(See next page)



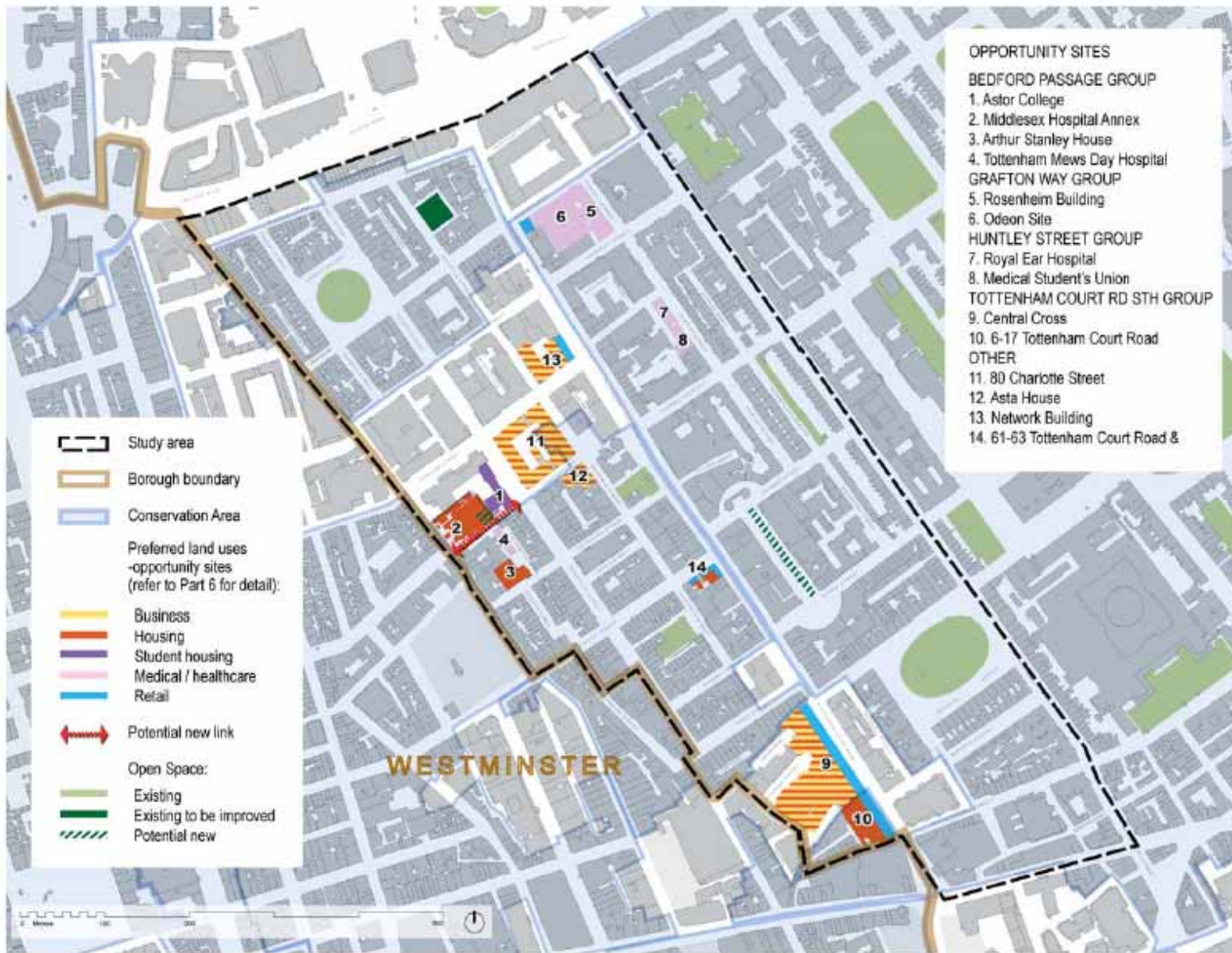
-  Fitzrovia Area Action Plan boundary
-  Area known as Fitzrovia in Westminster
-  Borough boundaries

Main Modification 6 – Proposed Submission Plan page 13

Re-title the map to read "Area Action Plan Key Directions Key Diagram", and amend to show:

- the amended northern boundary of the Plan area;
- the amended preferred land uses for Sites 2 and 3; and
- the corrected boundary of private open space at Fitzroy Square.

(See next page)



Main Modification 7 – Proposed Submission Plan page 20

Amend the map "Heritage Assets" to show:

- 52 Tottenham Street (immediately west of Arthur Stanley House) and as making a positive contribution to the character of the Charlotte Street Conservation Area;
- other adjustments to properties in Percy Street, Colville Place, Goodge Street, Fitzroy Square, Grafton Mews and Warren Street for consistency with the Charlotte Street Conservation Area Appraisal and Management Plan and Fitzroy Square Conservation Area Appraisal and Management Strategy;
- the amended northern boundary of the Plan area; and
- the corrected boundary of private open space at Fitzroy Square.

(See next page)

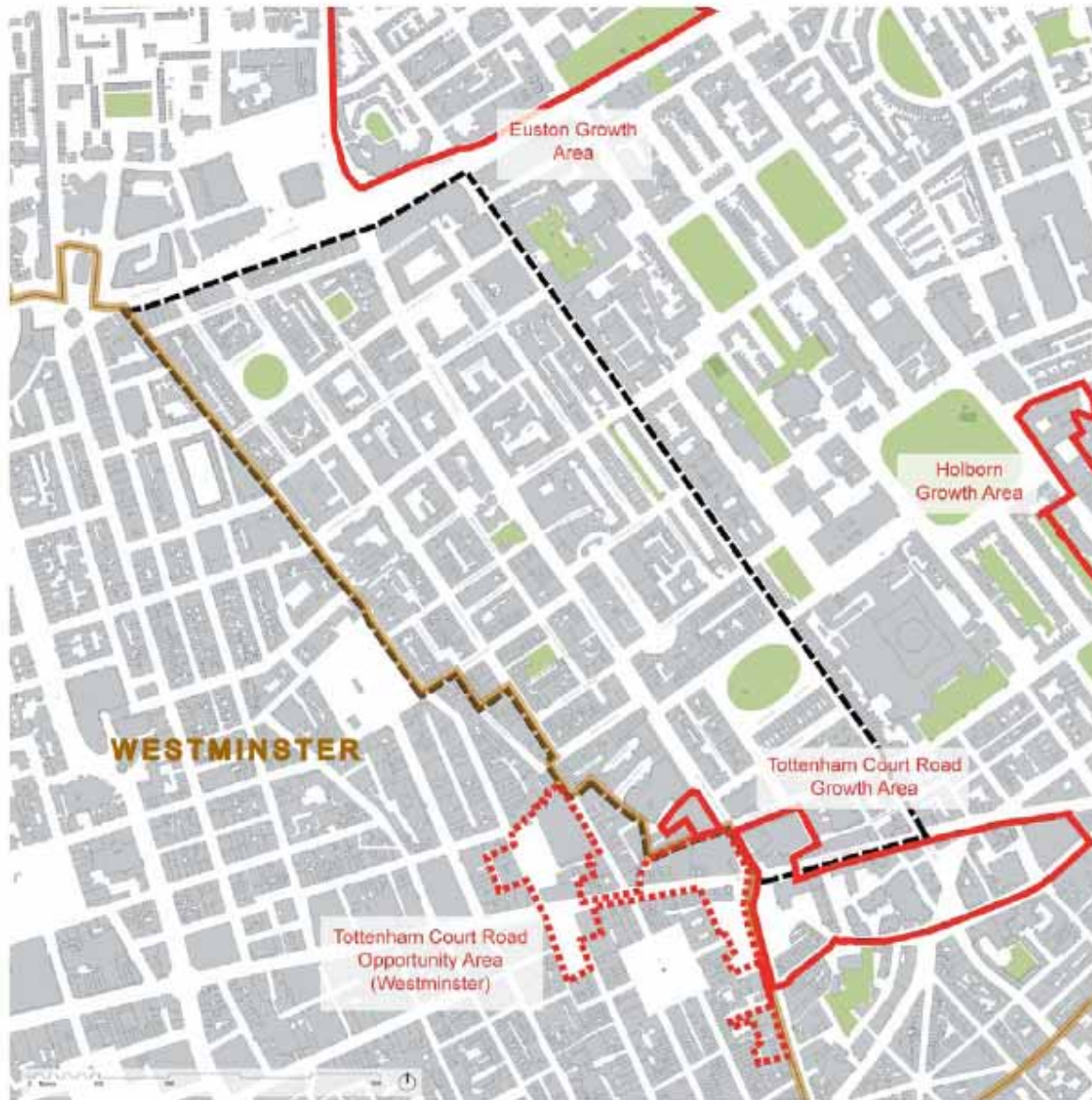


Main Modification 9 – *Proposed Submission Plan page 21*

Amend the map "Growth Areas" to indicate:

- that the Tottenham Court Road Growth Area extends slightly into the Plan area;
- the amended northern boundary of the Plan area; and
- the corrected boundary of private open space at Fitzroy Square.

(See next page)

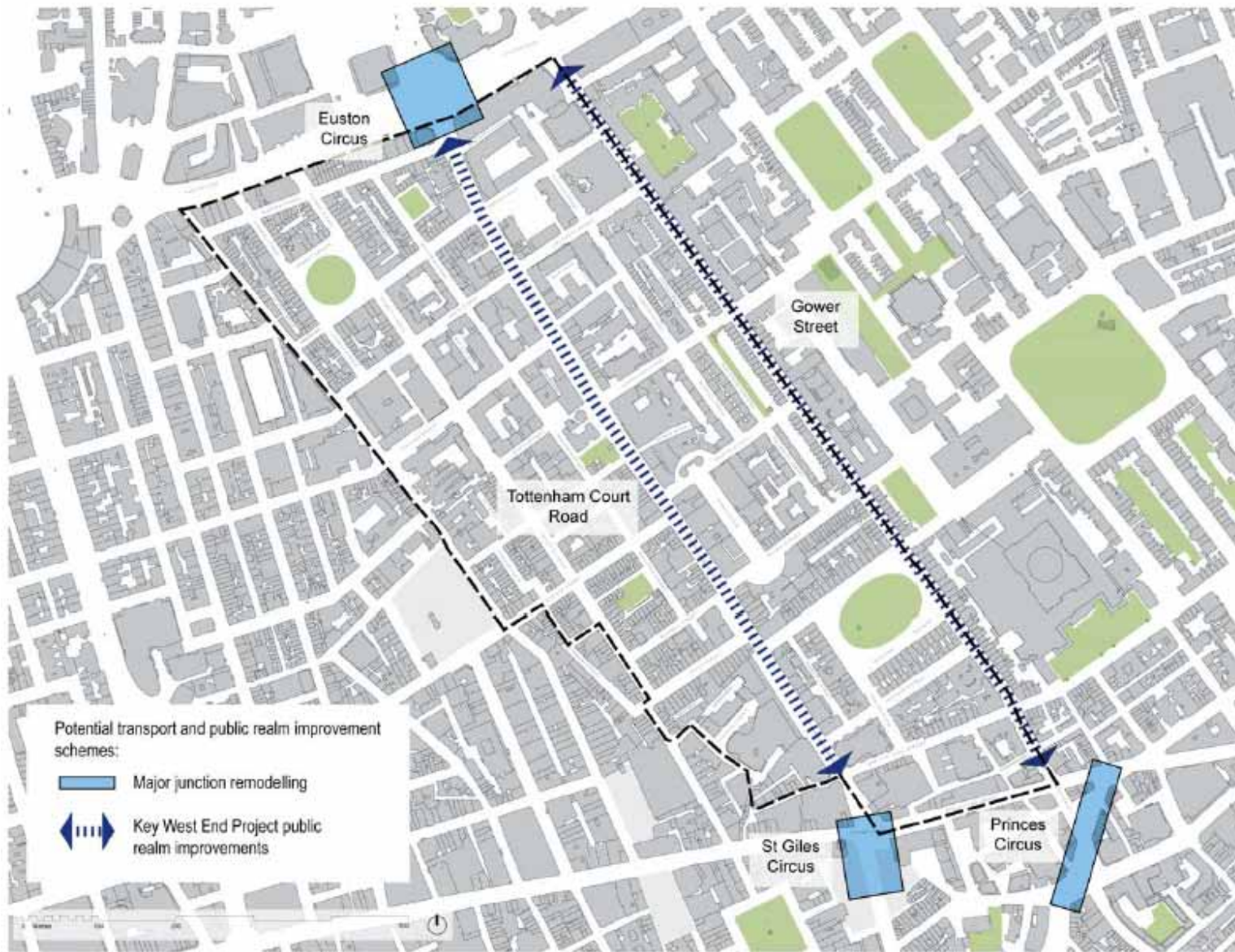


Main Modification 10 – *Proposed Submission Plan page 24*

Amend the map "Main roads and junctions" on page 24 to:

- delete the notations on Grafton Way;
- replace "Two way working" on the key with "key West End Project public realm improvements";
- show the amended northern boundary of the Plan area; and
- show the corrected boundary of private open space at Fitzroy Square.

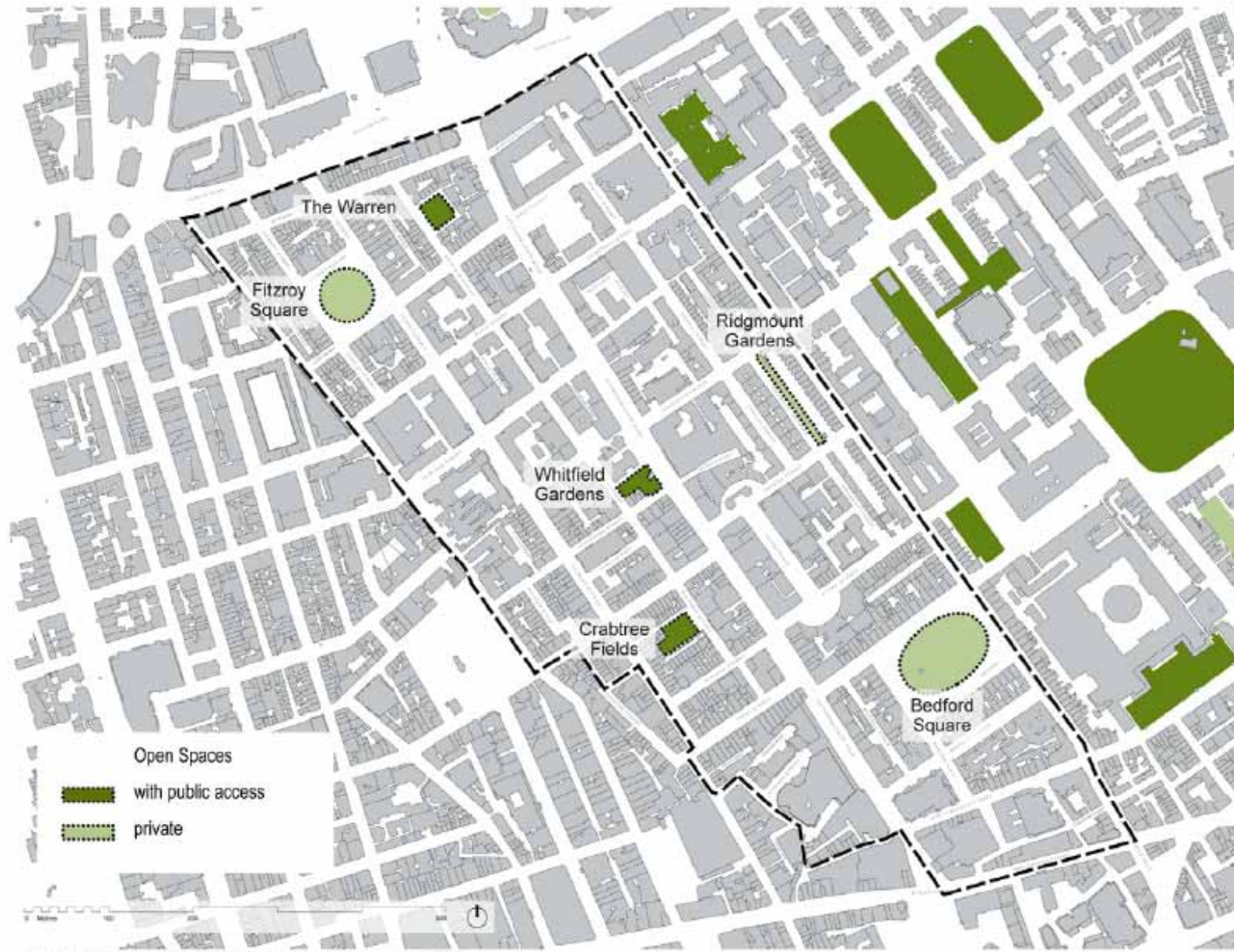
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Main Modification 16 – *Proposed Submission Plan page 35*

Amend the map "Public open spaces" to correct the boundary of private open space at Fitzroy Square and show the amended northern boundary of the Plan area.

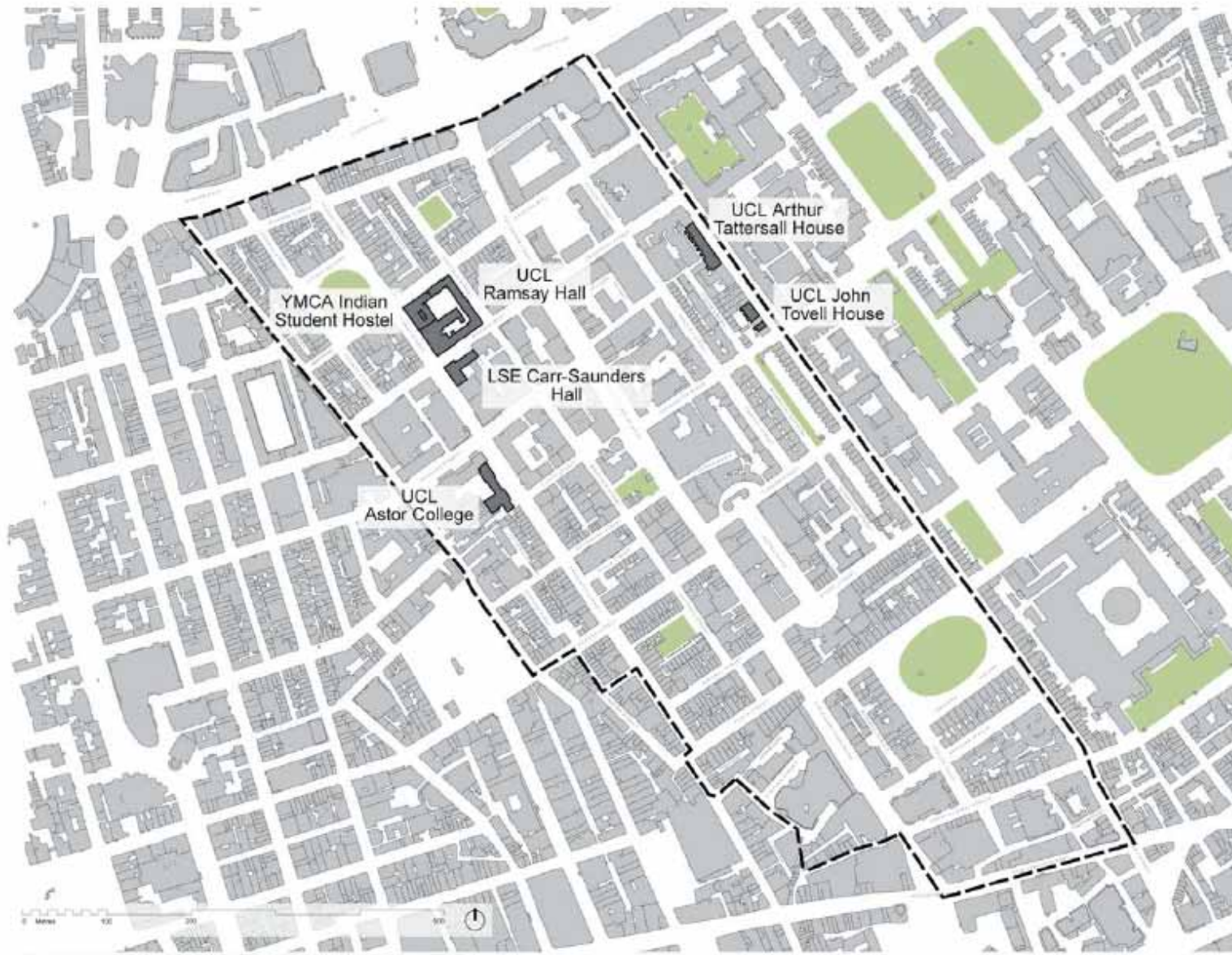
(See next page)



Main Modification 21 – *Proposed Submission Plan page 54*

Amend the map "Student Halls" to correct the boundary of private open space at Fitzroy Square and show the amended northern boundary of the Plan area.

(See next page)

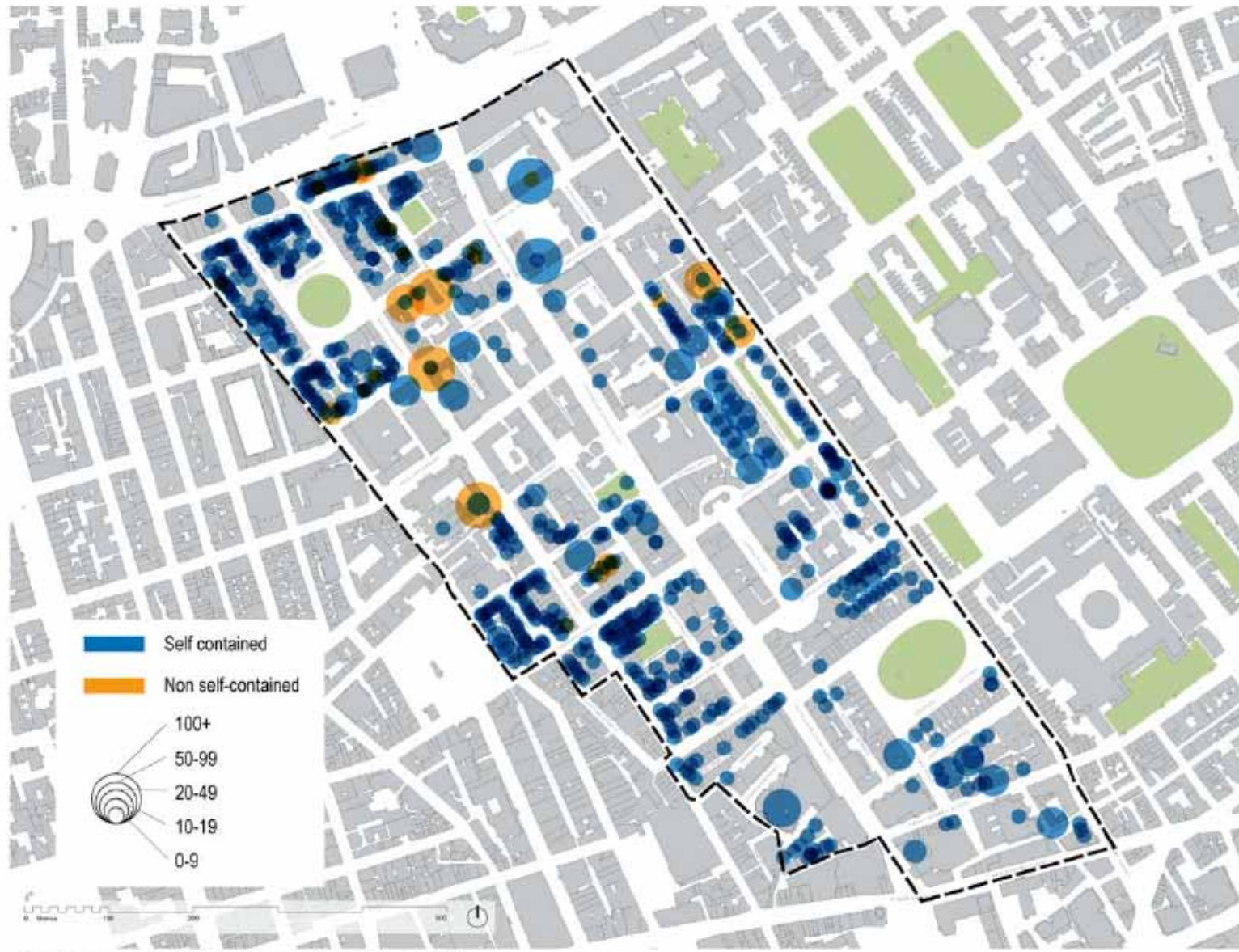


Main Modification 25 – *Proposed Submission Plan page 59*

Amend the map "Residential addresses and flats per address" to:

- correct the boundary of private open space at Fitzroy Square;
- show the amended northern boundary of the Plan area; and
- plot the latest address/ flat information from Camden's land and property gazetteer.

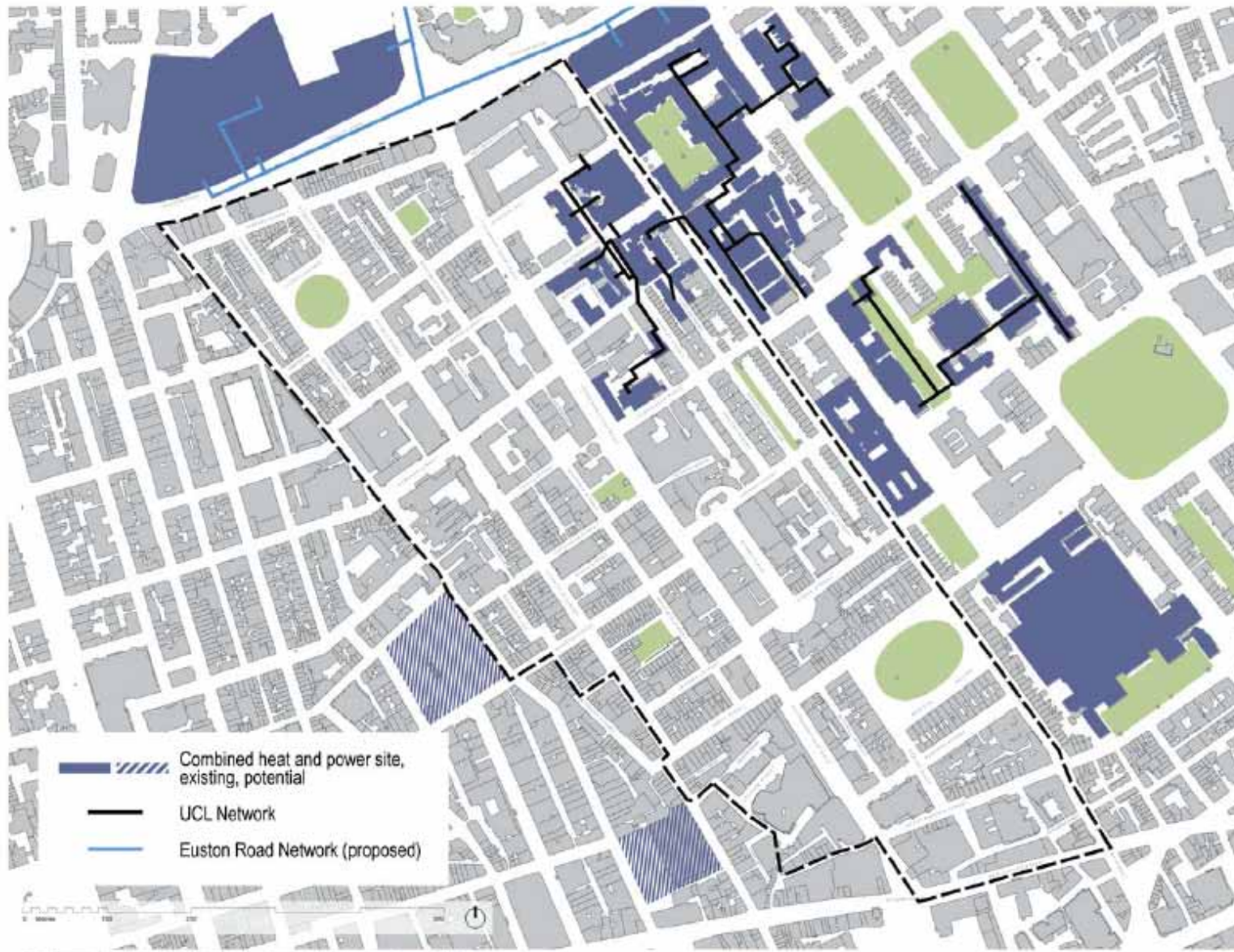
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Main Modification 27 – *Proposed Submission Plan page 62*

Amend the map "Local energy networks" to correct the boundary of private open space at Fitzroy Square and show the amended northern boundary of the Plan area.

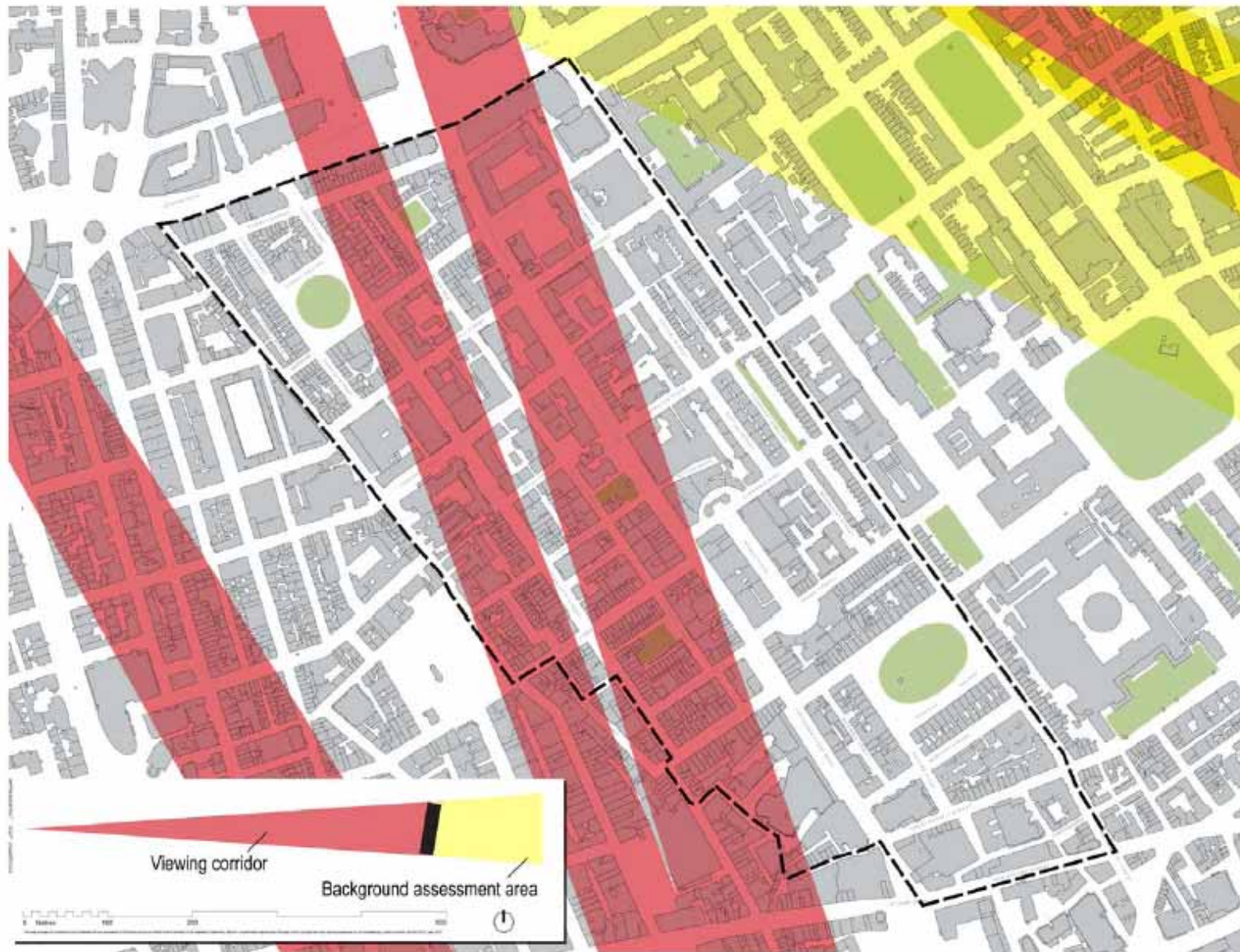
(See next page)



Main Modification 29 – *Proposed Submission Plan page 69*

Amend the map "Strategic viewing corridors" to correct the boundary of private open space at Fitzroy Square and show the amended northern boundary of the Plan area.

(See next page)

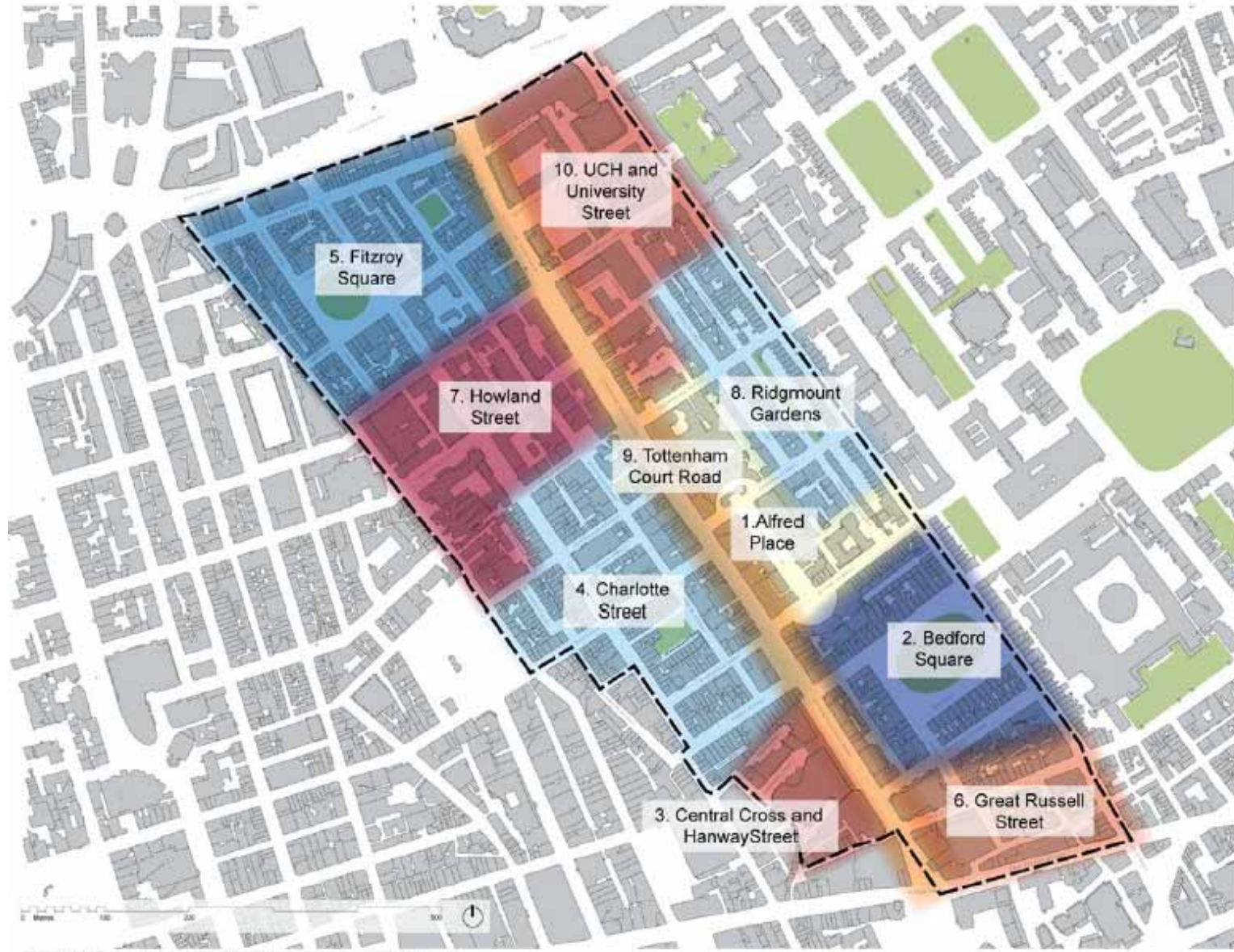


Main Modification 31 – *Proposed Submission Plan page 72*

Amend the map "Character Areas" to:

- merge the Euston Road Character Area into the Fitzroy Square Character Area;
- re-number Character Areas 6 to 11 as Character Areas 5 to 10;
- show the west side of Huntley St (up to Capper Street) within the Ridgmount Gardens Character Area;
- correct the boundary of private open space at Fitzroy Square; and
- show the amended northern boundary of the Plan area.

(See next page)



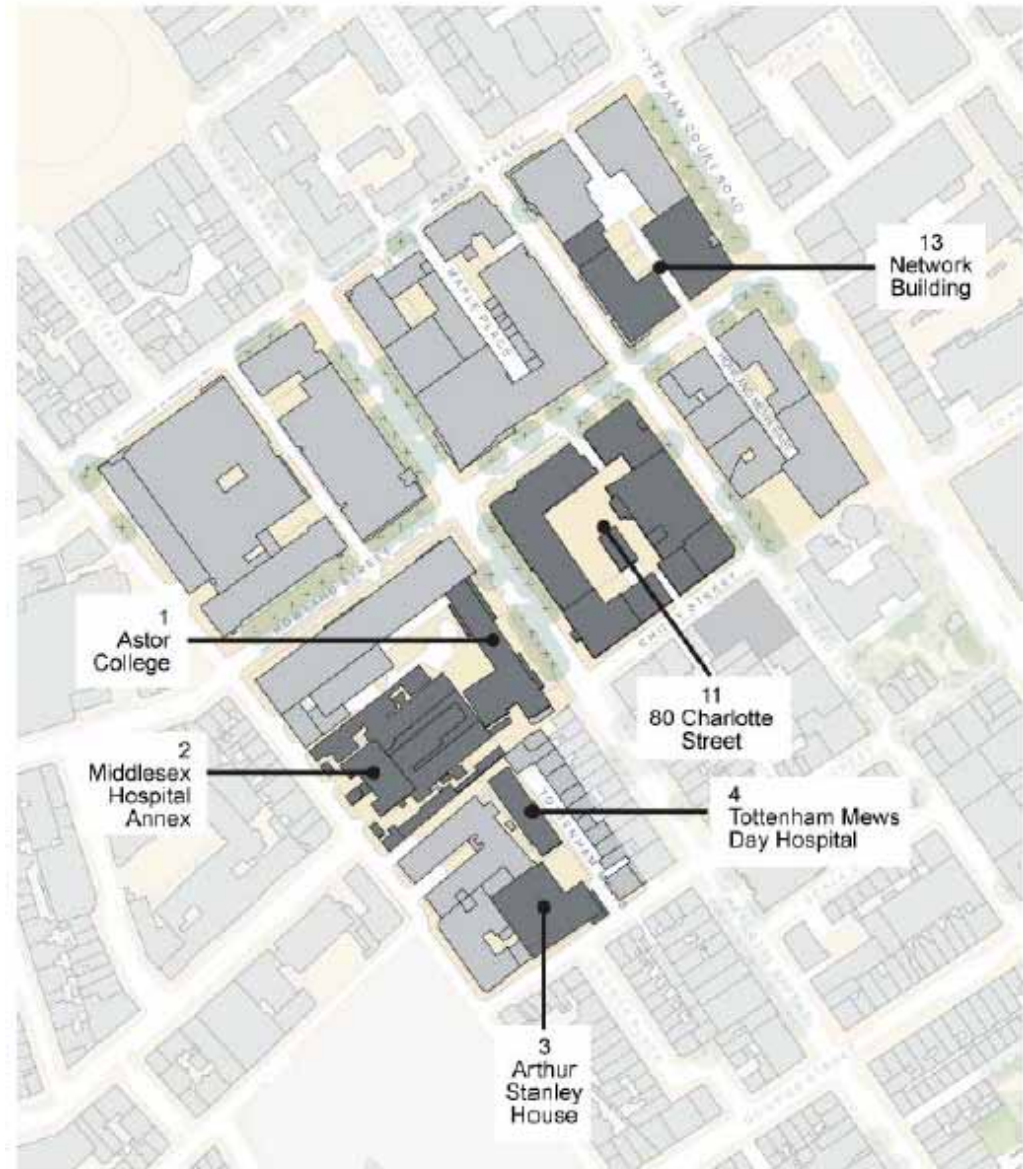
Main Modification 33 – Proposed Submission Plan page 77

Amend the map “Bedford Square Character Area” to include an additional Character Area Principle number “2.2” on the buff pedestrian area around Bedford Square Gardens.



Main Modification 37 – Proposed Submission Plan
page 92

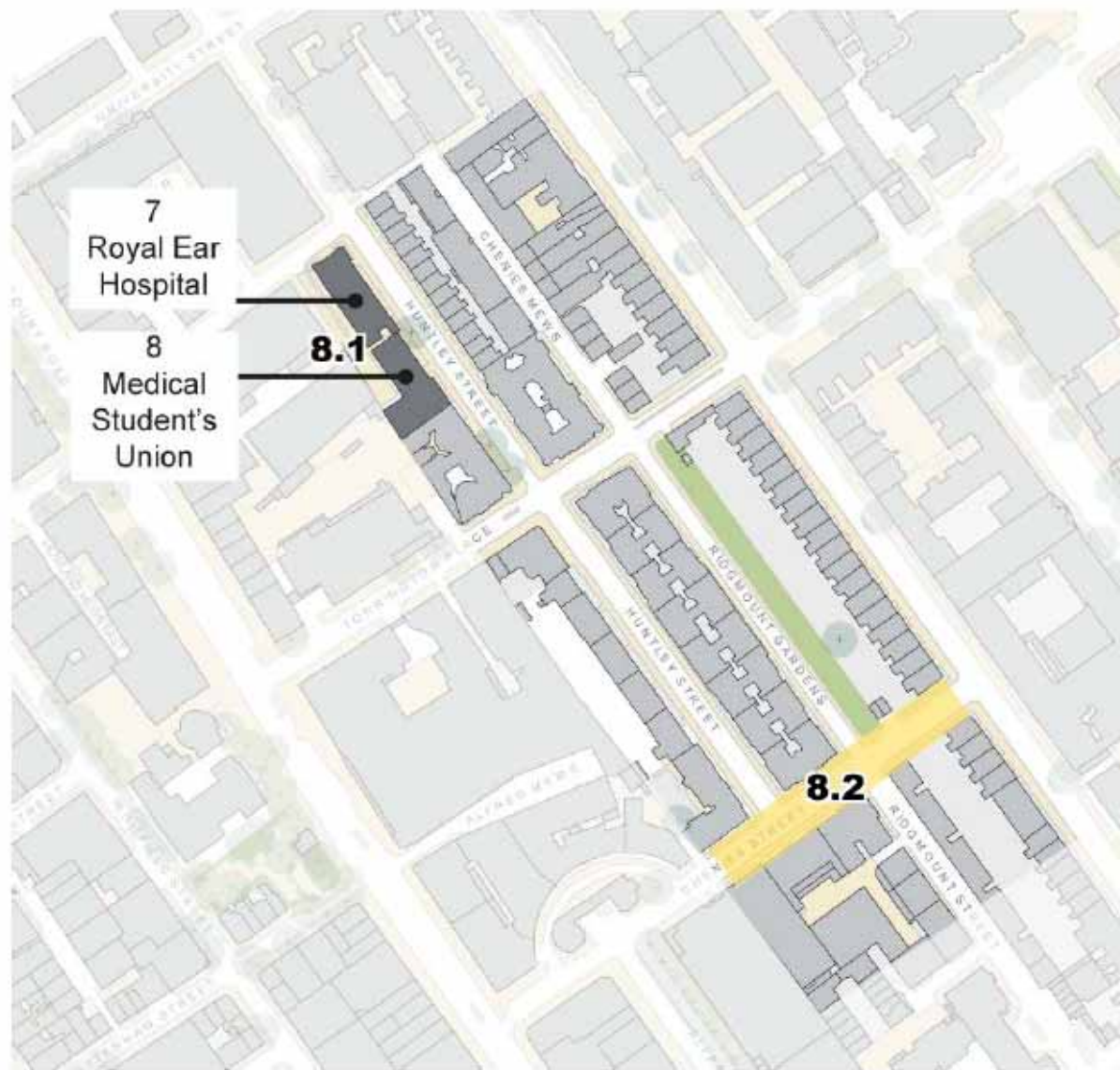
Amend the map "Howland Street Character Area" to exclude properties on the western side of Charlotte Street south of Opportunity Site 1.



Main Modification 39 – Proposed Submission Plan page 94

Amend the map "Ridgmount Gardens Character Area" to:

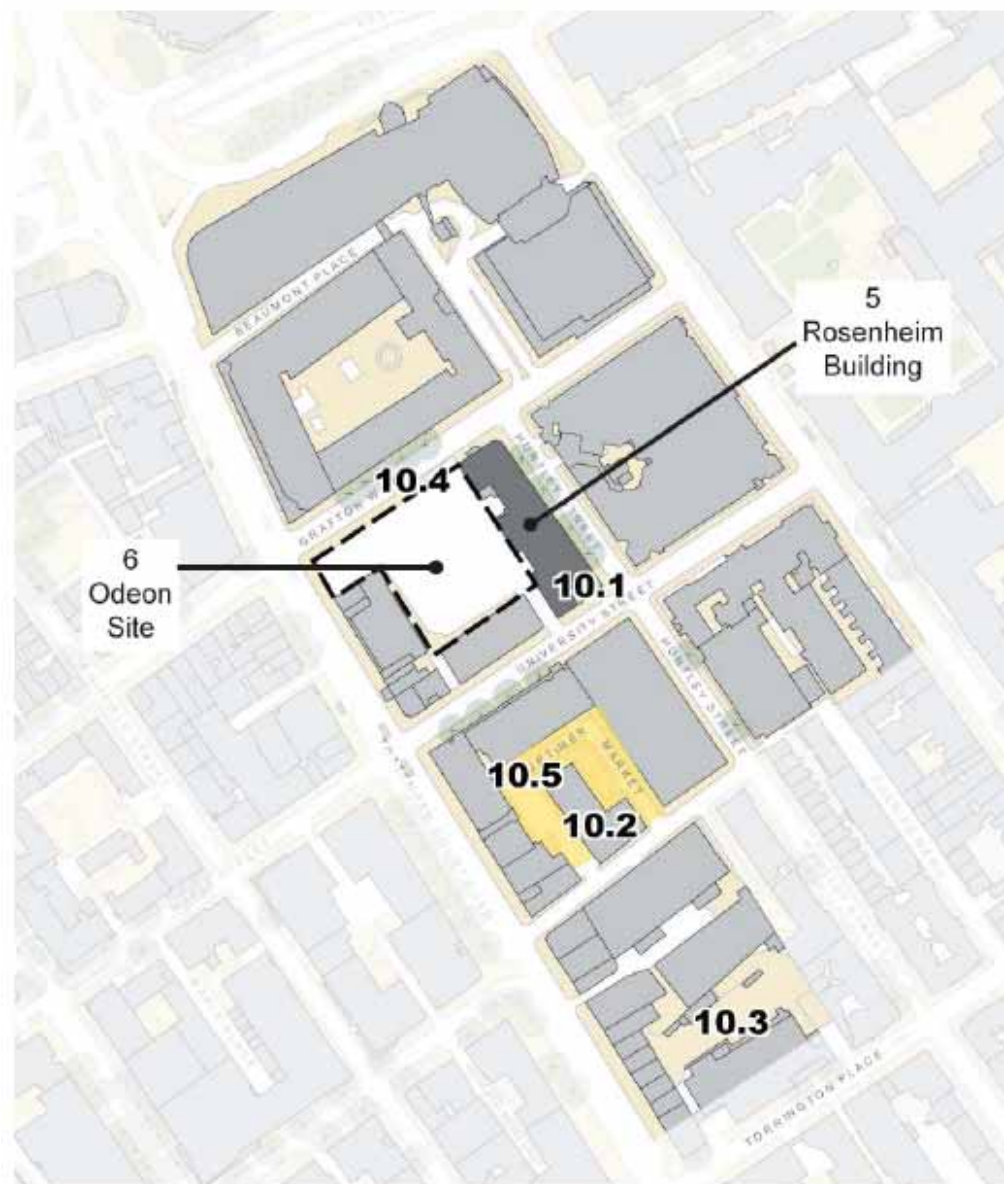
- show the west side of Huntley St (up to Capper Street) within the Ridgmount Gardens Character Area;
- include Opportunity Sites 7 and 8;
- include reference to a Character Area Principle 8.1 to the rear of Opportunity Sites 7 and 8; and
- re-number the notation for the "Public realm opportunity" to 8.2 to reflect and the deletion of the Euston Road Character Area and the addition of Character area principle 8.1.



Main Modification 41 – Proposed Submission Plan
page 99

Amend the map "UCH and University Street Character Area" to:

- remove the west side of Huntley St (up to Capper Street) from the UCH and University Street Character Area;
- remove northern frontage of Torrington Place from the UCH and University Street Character Area;
- remove the references to Opportunity Sites 7 and 8;
- show an additional Character Area Principle number "10.4" on Grafton Way adjacent to Opportunity Sites 5 and 6; and
- re-number the notations for the "Character area principles" as 10.1 to 10.3 and re-number the notations for the "Public realm opportunity" as 10.5 to reflect the deletion of the Euston Road Character Area and the addition of Character area principle 10.4.



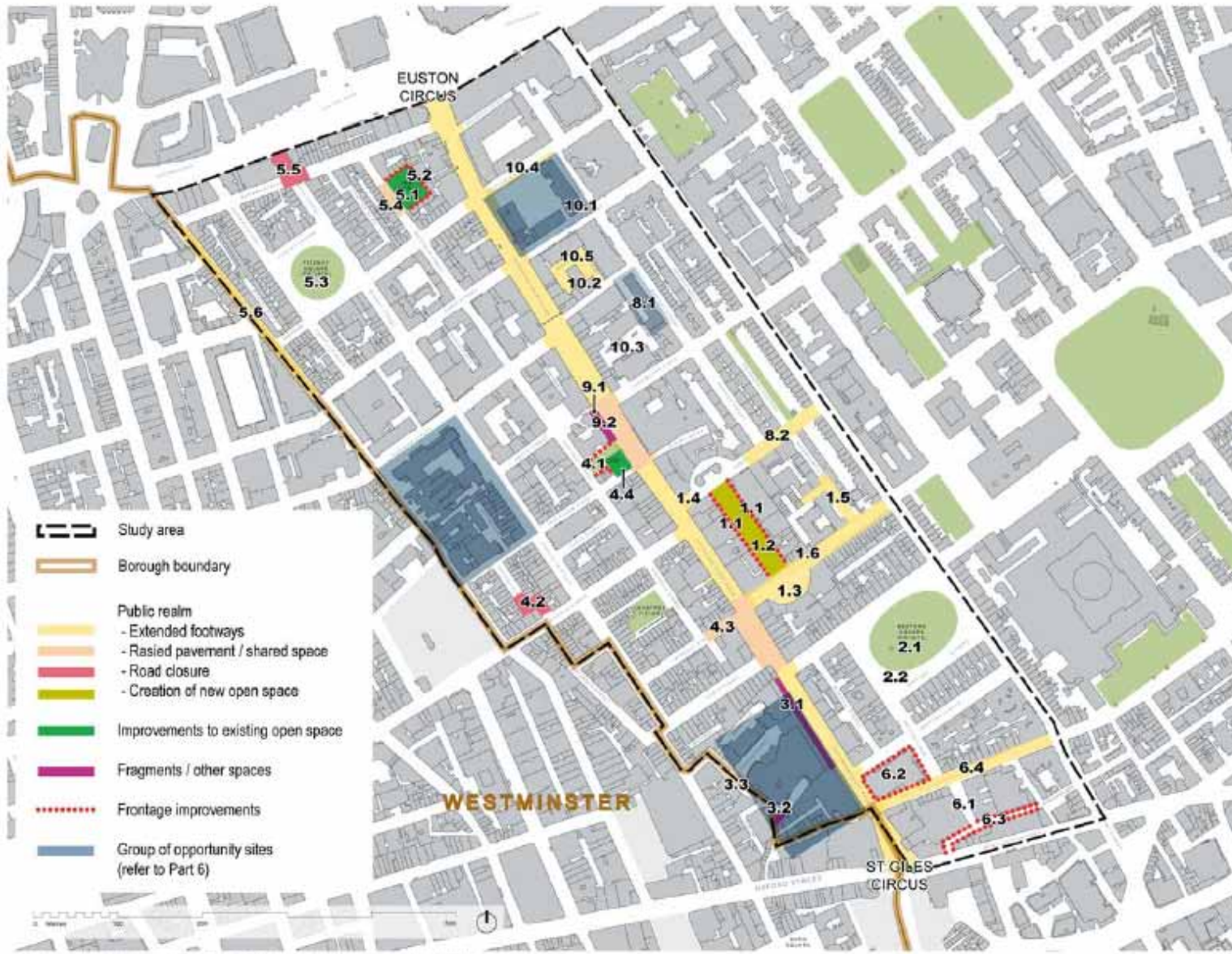
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Main Modification 43 – Proposed Submission Plan page 101

Amend the map "Combined character area principles and public realm proposals" to:

- include an additional Character Area Principle number "2.2" on the buff pedestrian area around Bedford Square Gardens;
- re-number all notations from 6.1 onwards to reflect deletion of the Euston Road Character Area;
- show an additional Character Area Principle number "8.1" on Huntley Street adjacent to Opportunity Sites 7 and 8;
- re-number the notation for the Ridgmount Gardens Character Area "Public realm opportunity" (Chenies Street East) to 8.2;
- show an additional Character Area Principle number "10.4" on Grafton Way adjacent to Opportunity Sites 5 and 6;
- re-number the notation for the UCH and University Street Character Area "Public realm opportunity" (Mortimer Market Highway) to 10.5;
- correct the boundary of private open space at Fitzroy Square; and
- show the amended northern boundary of the Plan area.

(See next page)

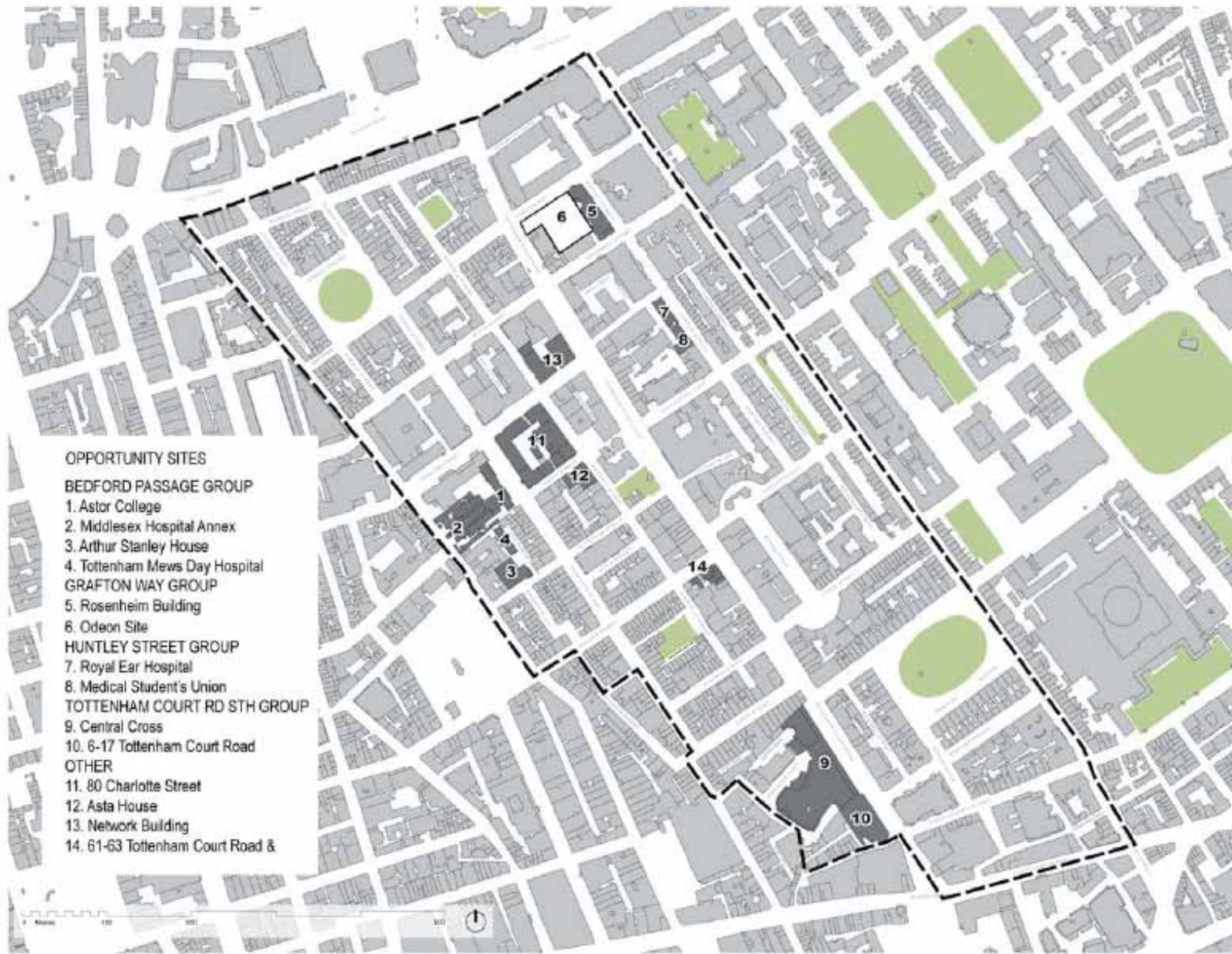


Main Modification 44 – *Proposed Submission Plan page 105*

Amend the map "Opportunity sites" to:

- correct the boundary of Opportunity Site 14 to include 61 Tottenham Court Road and the single storey retail building on the site of 7 Goodge Street;
- correct the boundary of private open space at Fitzroy Square; and
- show the amended northern boundary of the Plan area.

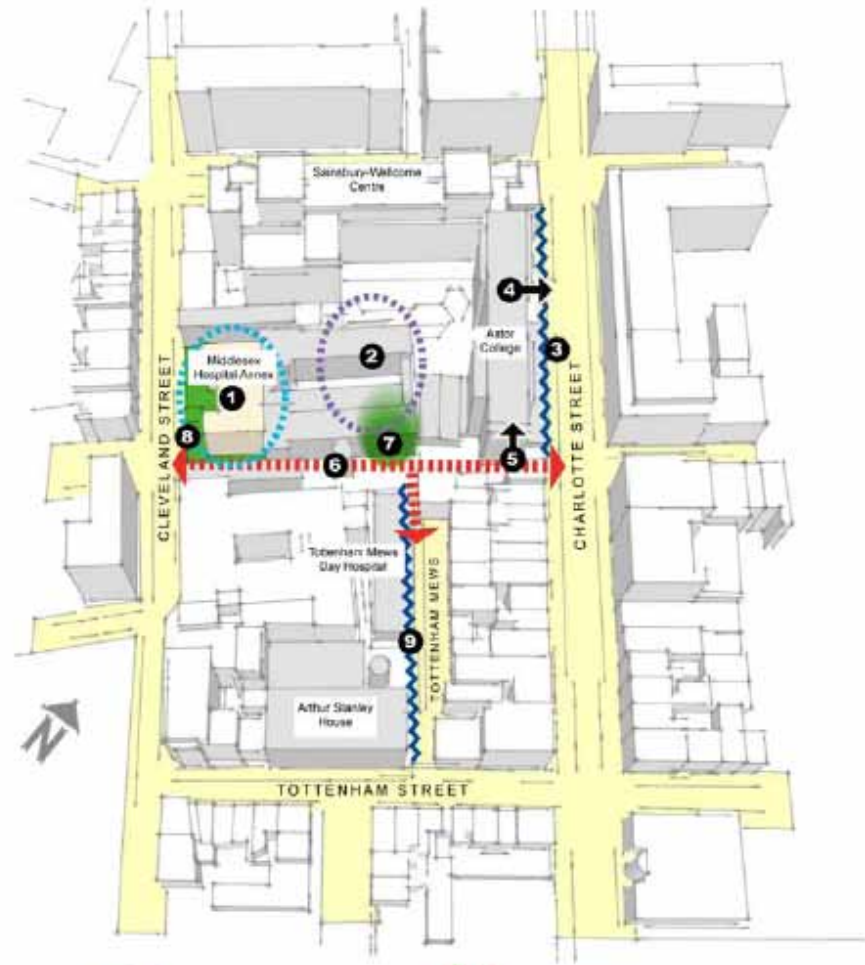
(See next page)



Main Modification 46 – *Proposed Submission Plan page 107*

Amend the map "Bedford Passage illustration of principles" to show the outline of existing buildings at the Middlesex Hospital Annex that could potentially be retained.

(See next page)

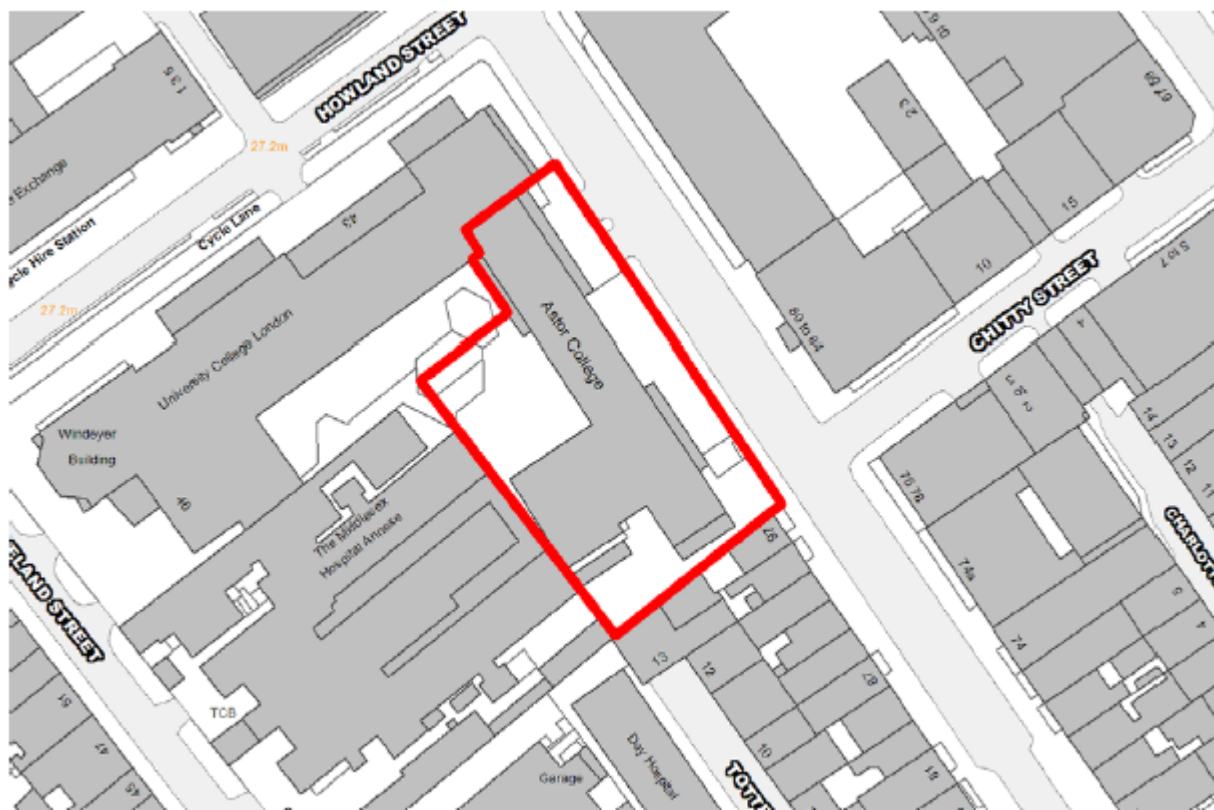


-  Potential locations for open space
-  New links to complete the grid
-  Improved frontage
-  Complimentary setting to the listed building
-  Larger scale development may be appropriate

Main Modification 47 (part) – Proposed Submission Plan page 108

Amend the map for Opportunity Site 1. Astor College on page 108 to incorporate the garden area between the rear elevation of Astor College and the western boundary of Opportunity Site 2 (Middlesex Hospital Annex).

(See also the Schedule of Main Modifications Proposed)



Main Modification 59 (part) – *Proposed Submission Plan page 140*

Amend the map for Opportunity Site 14. 61-63 Tottenham Court Road & 1-7 and 11-13 Goodge Street on page 140 to correct the site boundary to incorporate the single storey retail unit on the site of 7 Goodge Street.

(See also the Schedule of Main Modifications Proposed)



Minor modification 36 – Proposed Submission Plan
page 82

Amend the map "Charlotte Street Character Area" to correct the boundary of Opportunity Site 14 to include 61 Tottenham Court Road and the single storey retail building on the site of 7 Goodge Street.

