

Address:	Centre Point Tower, Centre Point Link and Centre Point House 101-103 New Oxford Street and 5-24 St Giles High Street London WC1A 1DD		3
Application Number:	2013/1957/P	Officer: Amanda Peck	
Ward:	Holborn & Covent Garden		
Date Received:	11/04/2013		
Proposal: (Scheme A) Change of use of Centre Point Tower from office (Class B1) and restaurant/bar (Sui Generis) to residential (Class C3) to provide 82 self contained flats (16 x one bedroom, 37 x two bedroom, 26 x three bedroom, 2 x 4 bedroom and 1 x 4 bedroom duplex) and ancillary residential floorspace (spa, gym and pool); change of use of Centre Point Link from office (Class B1) and bar (Class A4) to a flexible retail/restaurant/bar use (Class A1/A3/A4); change of use of Centre Point House at first and second floor levels from office (Class B1) to flexible retail/restaurant/bar use (Class A1, A3, A4); alterations and extensions to the existing building at ground floor level to provide flexible retail/restaurant/bar use (Class A1, A3, A4). Alterations to the external elevations of Centre Point Tower, Centre Point Link and Centre Point House including the relocation internally of the existing external ground and mezzanine eastern and western staircases, replacement and refurbishment of the facades, fenestrations and shopfronts, new pedestrian link through Centre Point House and associated basement car parking, terraces, landscaping, highway works (including the relocation of bus stands in Earnshaw Street), servicing and access arrangements and extract ducts. Redevelopment of the Intrepid Fox public house to provide flexible retail/restaurant/bar (Class A1, A3, A4) with 13 affordable housing units (8 x one bedroom, 3 x three bedroom and 2 x four bedroom) above in an eleven storey building (including basement) and associated basement car parking, terraces, servicing and access arrangements, and extract ducts.			
Drawing numbers : 552-19000-CPA; 552-19010-CPA; 552-19011-CPA; 552-19012-CPA; 552-19013-CPA; 552-19014-CPA; 552-19015-CPA; 552-19016-CPA; 552-19100-CPA; 552-19101-CPA; 552-19102-CPA; 552-19103-CPA; 552-19104-CPA; 552-19105-CPA; 552-19106-CPA; 552-19107-CPA; 552-19108-CPA; 552-19109-CPA; 552-19110-CPA; 552-19111-CPA; 552-19112-CPA; 552-19113-CPA; 552-19114-CPA; 552-19115-CPA; 552-19116-CPA; 552-19117-CPA; 552-19118-CPA; 552-19119-CPA; 552-19120-CPA; 552-19200-CPA; 552-19201-CPA; 552-19202-CPA; 552-19203-CPA; 552-19204-CPA; 552-19205-CPA; 552-19206-CPA; 552-19207-CPA; 552-19208-CPA; 552-19209-CPA; 552-19210-CPA; 552-19211-CPA; 552-19225-CPA; 552-19226-CPT; 552-19227-CPT; 552-19228-CPT; 552-19229-CPT; 552-19230-CPA; 552-19231-CPA; 552-19232-CPA; 552-19233-CPA; 552-19234-CPA; 552-19235-CPA; 552-19240-CPA; 552-19241-CPA; 552-19242-CPA; 552-19243-CPA; 552-19244-CPA; 552-19245-CPA; 552-19246-CPA; 552-19250-CPA; 552-19251- CPT; 552-19252-CPT; 552-19253-CPT; 552-19254-CPT; 552-19255-CPA; 552-19256-CPA; 552-19257-CPA; 552-19258-CPA; 552-19259-CPA; 552-19260-CPA; 552-19261-CPA; 552-19262-CPT; 552-19263-CPA; 552-19264-			

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Public Access Assessment; Supplementary Paper - Security Approach; Additional viewing gallery option: 'the Southwark Option'.

RECOMMENDATION SUMMARY: Grant subject to a S106 Agreement

Related Application?

11/04/2013

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Date of Application:

Application Number:

2013/1961/L

Proposal:

(Scheme A) Demolition of Intrepid Fox public house and internal & external alterations including the relocation internally of the existing external ground and mezzanine eastern and western staircases, the replacement and refurbishment of the facades, fenestration and shopfronts, all associated with the change of use of Centre Point Tower from office (Class B1) and restaurant/bar (Sui Generis) to residential (Class C3) to provide 82 self contained flats and ancillary residential floorspace (spa, gym and pool); change of use of Centre Point Link from office (Class B1) and bar (Class A4) to a flexible retail/restaurant/bar use (Class A1/A3/A4); change of use of Centre Point House at first and second floor levels from office (Class B1) to flexible retail/restaurant/bar use (Class A1, A3, A4); alterations and extensions to the existing building at ground floor level to provide flexible retail/restaurant/bar use (Class A1, A3, A4). Alterations to the external elevations of Centre Point Tower, Centre Point Link and Centre Point House including the relocation internally of the existing external ground and mezzanine eastern and western staircases, replacement and refurbishment of the facades, fenestrations and shopfronts, new pedestrian link through Centre Point House and associated basement car parking, terraces, landscaping, highway works (including the relocation of bus stands in Earnshaw Street), servicing and access arrangements and extract ducts. Redevelopment of the Intrepid Fox public house to provide flexible retail/restaurant/bar (Class A1, A3, A4) with 13 affordable housing units above in an eleven storey building (including basement) and associated basement car parking, terraces, servicing and access arrangements, and extract ducts.

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RECOMMENDATION SUMMARY: Approve Listed Building Consent

Applicant:	Agent:
Almacantar (Centre Point) Ltd C/o Agent	Gerald Eve LLP 72 Welbeck Street London W1G 0AY

ANALYSIS INFORMATION

Land Use Details:				
	Use Class	Use Description	Floorspace	Total
Existing	B1 Business A1/A3/A4 Retail/Restaurant/ Drinking Establishments C3 Dwelling House		27,516m ² 4,086m ² (CPH) 7,887 m ²	39,489m ²
Proposed	B1 Business A4 A1/A3/A4 Retail/Restaurant/ Drinking Establishments C3 Dwelling House		0m ² 8,155m ² 33,861m ² total 27,893m ² (tower) 1,882m ² (Intrepid Fox) 4,086m ² (CPH)	42,015m ²

Residential Use Details:										
	Residential Type	Bedrooms								
		1	2	3	4	5	6	7	8	9+
Existing	Flat/Maisonette		36							
Proposed	Flat/Maisonette private	16	73 (inc existing 36 in Centre Point Hous)	26	3					
	Affordable	8	3	2						

Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	70	0
Proposed	0	18

OFFICERS' REPORT

Reason for Referral to Committee: This application is being reported to the Committee as it involves the significant demolition of buildings in a conservation area [Clause 3(v)] and is a Major development which involves the creation of more than 10 new dwellings and more than 1000m² of non-residential floorspace [Clause 3(i)].

EXECUTIVE SUMMARY

This application follows a recent refusal at the site in September 2012, which was refused for the following reasons:

- Insufficient information to demonstrate that the proposed closure of St Giles High Street would not have a detrimental impact on the road network;
- Insufficient justification for the shortfall in provision of on-site affordable housing;
- The Conversion of the upper floors would result in a tall building without any publicly accessible areas on the upper floors;
- Provision of car parking on site;
- Impact of proposed drop/off pick up point on New Oxford Street; and
- Various S106 reasons.

The scheme has been amended since as follows:

- The provision of affordable housing on site is now included with the development of the 'Intrepid Fox' public house;
- The extension underneath the bridge link and consequent closure of St Giles High Street and provision of a new public square has been removed from the scheme (although S106 contributions and clauses to facilitate the provision of the square are included);
- The number of on site parking spaces has been reduced (from 35 to 18);
- Additional information has been submitted to explore the potential inclusion of public access to the upper floors with a viewing gallery and/or restaurant at the upper floors of the tower;
- New vertical extract ducts were previously proposed to the northern and southern ends of Centre Point House and these have now been removed and kitchen extraction is now proposed to be routed internally and vented at roof level; and
- The drop/off pick up point on New Oxford Street has been removed from the scheme.

Two applications were originally submitted with different affordable housing unit mixes proposed: Scheme A provides 13 units (8 x one bedroom, 3 x three bedroom and 2 x four bedroom) and Scheme B provided 16 affordable housing units (9 x one bedroom, 5 x two bedroom and 2 x four bedroom). Whilst Scheme B provided more floorspace it has been withdrawn following officer's concerns regarding design and housing unit mix.

A number of objections and letters of support have been submitted and these are outlined in detail in the consultation section. Whilst most of the reasons for objecting to or supporting the scheme remain the same there are additional objections raised to the loss of the Intrepid Fox public house as well as to the redevelopment on this part of the site.

As with the previous application the proposed loss of B1 office floorspace is considered to

be acceptable and appropriate given the site context and information submitted with the updated Economic Assessment. This issue was not a reason for refusal of the last planning application. There have been no significant policy changes and the site context has not changed since the last application. A financial contribution of £915,993 has been secured to mitigate the loss of employment opportunities for Camden residents.

The proposed residential units in the Tower and at the Intrepid Fox part of the site are considered acceptable in terms of standard of accommodation and accessibility. The affordable housing units are considered acceptable in terms of unit mix as the scheme provides an appropriate mix of large and small units with 38% being 3b or larger.

With regard to affordable housing the scheme now includes 13 units site (8 x one bedroom affordable rent, 3 x three bedroom and 2 x four bedroom social rent) on site with the development of the Intrepid Fox public house. This totals 1,882sqm or 7% of the total floorspace. Whilst this is below the policy requirement the applicant has submitted information in line with policy CS6 and DP3 with regard to physical, management and viability issues. The Council has employed BPS to independently review the information in the Financial Viability Assessment and have advised that the methodology adopted by the applicant is sound. Given the caveats in policies CS6 and DP3 which allow for the economics and financial viability of a development to be taken into account, officers consider that the policy tests have been demonstrated to justify the provision of 13 affordable housing units on site. The amount of affordable housing and the mix of units that can be provided on site is considered acceptable and compliant with policy.

It was recognised during the assessment of the previous application that the existing public access to the 31st, 32 and 33rd floors provides a unique attraction with the available views from the restaurant and bar areas and this was one of the reasons for refusal of the last application. The applicant has consequently explored whether a publically accessible area to the upper floors of the building can be re-provided and has submitted a 'Public Access Assessment', a Supplementary Paper regarding the Security Approach and an additional viewing gallery option: 'the Southwark Option'.

Options have been explored on the basis of a 360 degree view and location as close to the top of the building as possible being the preferred solution and are as follows:

- Option 1 & 1A – Gallery to entire floor at 33rd Level
- Options 2 & 2A – Large end galleries to north & south at 32nd level
- Option 3 – Small end gallery to north core at 33rd level
- Option 4 – Gallery to entire floor at 34th level
- Option 5 – Gallery to entire floor at 30th level
- Option 6 – Restaurant to entire floor at 30th level
- Option 7 and 7A – Semi public access at 32nd level ('the Southwark Option')

These documents outline the options explored, provide a comparison with other tall buildings, include Market Research carried out, operational considerations, financial viability considerations and security implications and the conclusion is that neither option would be commercially viable to an operator and that the inclusion of public access would impact on the viability of the scheme. Effectively the inclusion of public access would remove the scheme's ability to provide affordable housing on site or make any S106 financial contributions.

The extension underneath the bridge link and consequent closure of St Giles High Street and provision of a new public square has been removed from the scheme. This is because the impacts of the closure on the surrounding road network has not been fully understood or assessed by the Council and Transport for London, and has not undergone a comprehensive public consultation. It is currently anticipated that public consultation will be carried out by the Council in late summer 2013. Should a decision be taken to provide this public square a financial contribution of £3.17million has been secured, along with a £1million contribution towards the Tottenham Court Road two way working scheme, and clauses are also proposed within a S106 legal agreement to facilitate the provision and management of the square.

The number of on site parking spaces has been reduced (from 35 to 18) and whilst this is not ideal it is considered acceptable in this instance, because the applicant has fully explored alternative uses in the basement and has agreed to 'car cap' the scheme with a S106 legal agreement.

Planning Permission is recommended subject to a S106 Legal Agreement covering the following Heads of Terms:

- Affordable housing – provision of 13 units on site (8 x one bedroom affordable rent, 3 x three bedroom and 2 x four bedroom social rent)
- £3.17 million financial contributions for public realm/pedestrian/cycle improvements in the area
- £1million financial contribution towards the Tottenham Court Road two way working scheme
- £1.023 million financial contribution towards community facilities
- £915,993 financial contribution towards employment and training
- £310,735 financial contribution towards education
- Local labour and procurement (including provision of 36 apprenticeships during construction phase and recruitment and support fee of £1,500)
- Post construction Code for Sustainable Homes and BREEAM assessments and compliance with energy statement.
- Construction Management Plan (CMP), including membership of 'St Giles Circus Projects Working Group' and consultation with TfL
- Highway works during construction on St Giles High Street
- Public realm management strategy
- Car capped development
- Travel Plans
- Servicing Management plan (SMP)

1. **SITE**

- 1.1 The Centre Point tower is a major London landmark prominently situated at the junction of New Oxford Street, Charing Cross Road and Tottenham Court Road. The application site relates to the Centre Point Tower, Centre Point House and the link building which bridges across St Giles High Street linking the two buildings. All buildings on site are Grade II listed and are within the Denmark Street Conservation Area.
- 1.2 The entire complex was designed by Richard Seifert & Partners in 1960-1966. The tower is 35 storeys with slightly convex sides. One of the most distinctive features of the building is its extensive use of concrete including being an early example of off site pre casting. Over the years a number of alterations have been undertaken to the building such as the infilling of the ground floor under the tower (which was originally the point where the basement car park was accessed) and the removal of the fountain on Charing Cross Road for the construction of the Crossrail station.
- 1.3 The wider area around the site is characterised by many of London's most popular visitor attractions, including the British Museum, Covent Garden and Oxford Street. Interspersed within the above are residential and other small and large-scale retail uses.
- 1.4 The area around Tottenham Court Road Station and St Giles High Street will experience considerable change over the next ten years. Several projects and major redevelopment proposals in the area are at different stages of preparation. Chief amongst them are:
 - Enlargement of the Tottenham Court Road Underground Station ticket hall and implementation of the Crossrail scheme - Construction is underway and has involved the closure of Andrew Borde Street to create a site for the new main entrance to the station.
 - Redevelopment of the two Tottenham Court Road station over site developments in Westminster at 135-155 Charing Cross Road and 1-23 Oxford Street/157-165 Charing Cross Road – Planning permission granted by Westminster April 2012 subject to referral to Mayor of London and S106 legal agreement
 - Part redevelopment and part refurbishment of the Denmark Place Site to the south of Centre Point – pre application discussions are underway.
- 1.5 The entire site is within the LDF Tottenham Court Road Growth Area, with the Tower being within a designated Central London Frontage. The objectives of the Growth Area are to provide a balanced mix of uses, an excellent public realm, and development of the highest quality and to remedy the lack of open space. The site is also allocated in the submission document of the LDF site allocations (October 2012). Specifically the aspiration for the 'St Giles Circus' site is to support high quality development appropriate to this Central London gateway and the creation of new world class public spaces. The entire site is also within the area of focus of the approved St Giles to Holborn Place Plan, which is a strategic document, intended to guide investment decisions, service delivery and physical changes in area, to most effectively meet the needs of its communities. It draws together the range of work the Council and partners undertake across a wide range of service

areas. The entire site is also located within an area identified as being susceptible to ground water flooding with potential slope stability issues.

- 1.6 Following approval of the station entrance design at Tottenham Court Road a steering group was established to oversee the development of the urban realm design for St Giles Circus. This steering group consisted of representatives from LUL, Crossrail, London Borough of Camden, City of Westminster, TfL and Design for London. Gillespies developed the designs for the urban realm through to RIBA stage D and these were presented to stakeholders (CABE, Mayor's Design Advisory Panel, local landowners, local business groups and the Tottenham Court Road Community Liaison Panel, Ward Cllrs and the Cabinet Member for Transport), with a display in the Crossrail Visitor Information Centre on St Giles High Street. A 'schedule 7' Crossrail application (see relevant history below) has consequently been approved for the reinstatement of the worksite within the area immediately surrounding the station (to the west of Centre Point tower), which is in effect phase 1 of the implementation of the Gillespies study. The aspiration of the Gillespies study is to close St. Giles High Street and create a new public space in between Centre Point Tower and Centre Point House. The provision of this public space is identified in the LDF Draft Site Allocations document with the wider objectives being to provide the space through planning obligations and working with other agencies. These proposals are subject to traffic modelling work and public consultation to determine what the impacts of the road closure would be. The proposals are also dependent on wider proposals in the area including the Tottenham Court Road two way working scheme. The current timetable for this work is as follows:
- Traffic modelling to be completed and assessed by TfL August/September 2013
 - Public consultation in Autumn 2013
 - Decision by stakeholders on full implementation of Gillespies study, Winter 2013.

2. THE PROPOSAL

Original

- 2.1 As per the previous application the proposal is for the change of use of the tower from office (class B1) and restaurant/Bar (Sui Generis) to residential. The conversion would provide 82 new residential units (16 x 1 bed, 37 x 2 bed, 26 x 3 bed and 3 x 4 bed) in addition to the 36 existing 2 bed residential units in Centre Point House. The provision of ancillary floorspace in the form of a spa, gym, pool and club on the first and second floors of the tower is also proposed. The change of use of the link building and the first and second floors of Centre Point from office (class B1) and bar (class A4) to flexible retail/restaurant/bar use (class A1/A3/A4) is also proposed.
- 2.2 The scheme now also includes the redevelopment of the Intrepid Fox public house to provide affordable housing on site. Two applications were originally submitted with different affordable housing unit mixes proposed: Scheme A provides 13 units (8 x one bedroom affordable rent, 3 x three bedroom and 2 x four bedroom social rent) and Scheme B provided 16 affordable housing units (9 x one bedroom, 5 x two bedroom and 2 x four bedroom). Whilst Scheme B provided more floorspace it

has been withdrawn following concerns regarding design and housing unit mix.

- 2.3 Externally the proposal includes façade and window replacement to all buildings and the relocation internally of the existing external ground and mezzanine eastern and western staircases at the tower. A new pedestrian link is also proposed underneath Centre Point House.
- 2.4 The buildings would be serviced from Earnshaw Street and the existing vehicular access ramp is proposed to be replaced with two car lifts and a servicing area. The existing basement car park will be used for the location of plant, cycle parking and 17 residential car parking spaces (with a reduction from 70 existing spaces - 55 of which are regularly in use).

Revision[s]

- 2.5 An additional viewing gallery option has been explored which looks at a semi public viewing gallery: 'the Southwark Option'.
- 2.6 Additional daylight/sunlight information has been submitted regarding the impact on properties at Matilda Apartments and St Giles High Street.
- 2.7 An addendum to the wind impact assessment has been submitted to clarify the conclusions of the wind impact assessment submitted for the adjacent site.
- 2.8 Scheme B with 16 affordable housing units at the Intrepid Fox has been withdrawn following concerns regarding design and housing mix.

3. RELEVANT HISTORY

Application site

- 2012/2895/P and 2012/2897/L- Internal and external alterations including the relocation internally of the existing external ground and mezzanine eastern and western staircases, the replacement and refurbishment of the facades, fenestration and shopfronts, all associated with the change of use of Centre Point Tower from office (Class B1) and restaurant/bar (Sui Generis) to residential use (Class C3) to provide 82 residential units and ancillary residential floorspace (spa, gym, pool and club) change of use of Centre Point Link from office (Class B1) and bar (Class A4) to a flexible retail/restaurant/bar use (Class A1/A3/A4) and the erection of a ground floor extension partially infilling under the bridge link; change of use of Centre Point House at first and second floor levels from office (Class B1) to flexible retail/restaurant/bar use (Class A1, A3, A4); alterations and extensions to the existing building at ground floor level to provide flexible retail/restaurant/bar use (Class A1, A3, A4). Alterations to the external elevations of Centre Point Tower, Centre Point Link and Centre Point House including the replacement and refurbishment of the facades, fenestrations and shopfronts, new pedestrian link through Centre Point House and associated basement car parking, terraces, landscaping, public realm, highway works(including the closure of the northern part of St Giles High Street and the relocation of bus stands to Earnshaw Street), servicing and access arrangements and extract ducts. Refused 27 September 2012 was refused for the following reasons:

- Insufficient information to demonstrate that the proposed closure of St Giles High Street would not have a detrimental impact on the road network;
- Insufficient justification for the shortfall in provision of on-site affordable housing;
- The Conversion of the upper floors would result in a tall building without any publicly accessible areas on the upper floors;
- Provision of car parking on site;
- Impact of proposed drop/off pick up point on New Oxford Street; and
- Various S106 reasons.
- 2013/1082/P Request for a scoping opinion under the Town and Country Planning (EIA) Regulations in respect of change of use of Centre Point tower from offices to residential, change of use of the lower floors of Centre Point House to retail and restaurant uses (Class A1 and A3), redevelopment of Intrepid Fox site to offer affordable housing provision and refurbishment of facades and windows to both buildings. Response that EIA is not required 19 April 2013
- 2005/2045/P - Change of use from office (B1) to mixed restaurant and bar use (Sui Generis) at 31st & 32nd floor levels, use of part of the basement for associated storage and food preparation area and the installation of plant at roof level. Granted 22 February 2006 subject to a S106 for a Service Management Plan
- 2006/5040/P - Change of use of a level 33 viewing gallery, ancillary to business use (B1 Use Class) to a mixed use as a restaurant (A3 Use Class) and bar (A4 Use Class) and offices (B1 Use Class) (sui generis Use Class). Granted 5 January 2007 subject to S106
- Change of use of ground floor bank to bar/ restaurant use (ref 2005/1553/P, PSX0204812, PS9704250/r2).
- 2009/4440/L - Removal of existing staircase, erection of temporary external staircases, and erection of new staircase and associated alterations at mezzanine level landing.
- Various listed building consents for internal alterations,) new lighting, rooftop plant;
- Various advertisement consents for signage on the building;
- Various planning applications for rooftop plant;

Crossrail / Tottenham Court Road station

- Outline planning permission and heritage consents for works required for the construction, maintenance and operation of the Cross London Rail Link (CLRL - Crossrail) were deemed granted by the Crossrail Act 2008.
- Permission for the proposed works is subject to conditions imposed by Section 10 and the planning regime set out in Schedule 7 of the Act. These require plans and specifications for the operations, and works and construction arrangements to be approved by the relevant local authorities. Various applications have been approved including the following:
- 2012/1518/P - Submission under Schedule 7 of Crossrail Act 2008 for worksite restoration scheme at Tottenham Court Road Station (East) (CAM/2/4/1).

4. **CONSULTATIONS**

Statutory Consultees

4.1 Transport for London

- This site was the subject of a previous planning application (LB Camden reference 2012/2895/P which was subsequently refused by Camden. One of the key reasons for refusal was that this application proposed the closure of the northern end of St Giles High Street (part of the Strategic Road Network) to create a new area of public realm. Whilst a plan for this is being considered by both TfL and Camden Council for implementation in the future, this was considered premature in the absence of any traffic modelling to ascertain the highway impacts of the closure. As such, and following extensive pre-application discussions on this and a number of other issues, this revised application proposes no changes to the highway network. However, it is understood that at a point where the closure of St Giles High Street is approved by TfL, a subsequent application making use of the area under Centre Point Link would be submitted to Camden.
- The site is bounded to the east by Earnshaw Street, to the north by the A40 New Oxford Street, to the south by Denmark Street, and to the west by the A400 Charing Cross Road. St Giles High Street also forms part of the A40 and runs through the middle of the site. However, the highway network around the site is currently subject to a number of temporary changes and diversions associated with Crossrail and London Underground (LU) upgrade works at Tottenham Court Road station, immediately to the west of the site. The A40 and A400 form part of the Strategic Road Network (SRN), with the nearest part of the Transport for London Road Network (TLRN) being the A3211 Victoria Embankment, approximately 1km to the south-east of the site.
- Tottenham Court Road station is served by the Central and Northern lines. Victoria line services from Oxford Circus Station and Piccadilly line services from Leicester Square Station are also available within walking distance. In addition, there are 18 bus routes available within 640m (an 8 minute walk) of the site. As such, the site records the highest possible Public Transport Accessibility Level (PTAL) of 6b – out of range of 1 to 6. The accessibility of the site will be further increased following the introduction of Crossrail services at Tottenham Court Road in 2018.
- As well as being the traffic authority for the Strategic Road Network, TfL has an interest in this development due to its proximity to, and potential impact on, Tottenham Court Road station and bus standing facilities in the area. There are also a number of schemes that affect the highway network in the area and which are currently under consideration, including temporary road closures and diversions due to Crossrail construction, the St Giles Circus Urban Realm scheme (and associated submission under Schedule 7 of the Crossrail act), and its associated proposals to introduce two way working for buses on Tottenham Court Road and Gower Street. This application needs therefore to be considered in the context of these other schemes.

Buses

- Given the reduction in the number of bus trips associated with the development as outlined below and the site's proximity to a number of high frequency bus routes, it is accepted that the site will not result in an unacceptable impact on the local bus capacity. However, please note the comments made in the 'Construction' section, below.

Car Parking

- Seventeen car parking spaces are proposed at basement level, at a ratio of

0.12 spaces per unit. It is understood that all these spaces would be of a size that makes them suitable for use by blue badge holders and each space would benefit from an electric vehicle charging point. TfL welcomes the reduction in car parking from the previous application, although it is requested that the spaces are assigned in a way that ensures they can be used by people with mobility issues who may be living in one of the wheelchair accessible residential units. This may require that spaces are leased rather than sold.

- Access to the basement car parking would be via car lift from Earnshaw Street, with an off street area provided for vehicles to wait without obstructing the adjacent bus stands or pedestrian crossing, which is welcomed by TfL. Residents would then be prevented from applying for parking permits in the surrounding Controlled Parking Zone (CPZ), which is supported and should be secured as part of the Section 106 agreement for the site.

Trip Generation and Distribution

- Sites within the TRAVL database have been used to determine the number of trips likely to be generated by both the existing use on site and the proposed development, with adjusted 2001 Census data then being used to allocate trips onto different modes, taking into account lower car use in connection with the retail uses for which there is no dedicated parking. This approach seems reasonable to TfL, and results in a reduction in the number of trips across most modes in both peak hours and across the day.

Walking, Cycling and Public Realm

- Cycle parking for the residential units is proposed at basement level, with cycle parking for the retail units provided on street at surface level. Whilst the total amount of cycle parking is in line with London Plan standards which is welcomed by TfL, TfL would question whether some of the retail cycle parking needs to be provided at basement level to provide secure parking for staff, although some provision should also be made at street level for visitors. The location of the on street cycle parking should also be confirmed.
- Given the wider proposals for the area, including creation of new areas of public space as well as several redevelopments, TfL has aspirations to introduce a new cycle hire docking station close to the application site. Given that the development will introduce new demand to the area, it is felt appropriate that the applicant should make a financial contribution towards this, directly benefiting the site and in line with London Plan policy 6.9 Cycling. TfL would welcome further discussion on this with both Camden council and the applicant.
- Section 9.2 of the Design and Access Statement supports the removal of the TfL vent on New Oxford Street and states that it is understood that the vent is redundant. However, this is not the case and this is required to vent the new station. The applicant has previously been advised of this.
- It is also understood that the contents of the Design and Access Statement that refer to Application 2 are indicative at this stage, and have been provided primarily for reference. However, it is understood that the applicant has met with Gillespies, the landscape architects working on future plans for St Giles Circus, in order to try and incorporate some of the applicant's requirements into their designs which is not reflected in this section of the Design and Access Statement. It is understood that changes have been made in the Gillespies scheme to the steps to the south of Centre Point and that the scope of the paving proposed has been reduced. It should also be noted that the western external stair to Centre Point does not form part of the Gillespies scheme, and

as above that the vent shaft on New Oxford Street is not redundant. There is also no mention within the application of a potential security scheme. Security proposals must be agreed with London Underground, and a condition should be secured on any consent requiring approval of security proposals in consultation with them prior to the commencement of works.

Travel Plan

- A draft Framework Travel Plan and Residential Travel Plan have been provided as an appendix to the transport assessment and will need to be secured as part of the section 106 agreement for the site. The Travel Plans have been assessed using the ATTrBuTe tool and their content is generally good, although the mode share targets could be more ambitious.

Construction and Servicing

- Servicing is proposed using an off street service area accessed from Earnshaw Street, with service vehicles able to enter and exit the site in a forward gear. This represents an improvement over the current situation where larger vehicles often have to reverse to or from Earnshaw Street and as such is welcomed by TfL. A draft Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) have been provided as an appendix to the Transport Assessment. These are welcomed by TfL and should be secured as part of any consent for the site, with both to be agreed in consultation with TfL.
- Both the draft DSP and CLP contain good information on the potential measures, targets and monitoring of the plans which will be taken forward once occupiers are known and the construction programme is further advanced. In particular, co-ordination of construction works with other schemes and developments in the area will be key in ensuring that the impact on the transport network is minimised, and it is understood that LB Camden are currently setting up a construction working group to this effect. The applicant should be required to be a part of this working group, and may need to fund some pieces of work (with others) to ascertain the impacts of different schemes being progressed at the same time.
- TfL and London Underground have held a number of meetings with the applicant prior to the submission of this application to understand the challenges and constraints around construction and have reached agreement in principle on a number of areas. However, there are several issues that will need to be resolved following any grant of planning consent, including co-ordination with works on neighbouring sites (including Crossrail, London Underground works, LB Camden public realm works and the proposed development at St Giles Circus) as well as subsequent traffic, bus, pedestrian and cycle impacts. In particular, any delay or cost implication to the Tottenham Court Road Station Upgrade (TCRSU) works would not be acceptable to TfL. As such, a detailed Construction Management Plan should be secured by consent prior to the commencement of works. For reference, the outstanding issues relating to the TCRSU scheme are as follows, noting that TfL are happy to assist in drafting any infrastructure protection conditions:
 - The applicant proposes to install a gantry crane in New Oxford Street, on the north side of Centre Point tower in 2014. However, TfL will require this area to facilitate Phase 2 of the TCRSU construction works, consisting of demolition of the existing ticket hall and piling works to protect a Thames Water sewer. It has been suggested that the applicant may be able to remove part of the gantry at the time TfL require the site (mid-2014) but

there is a real concern that this may not prove possible. TfL would therefore request that this arrangement be included as a condition to any approval of the planning application. Practically however, the applicant should defer their works until the end of the TCR Phase 2 works. If they do not, and are not in a position to vacate the site required by TfL in mid-July, LU will have to pay damages of up to £12k per day that their contractors cannot complete the works as well as suffering huge reputational damage. The applicant must also consider any disruption to the TCR Project during erection of the gantry and in addition there are buried services running beneath this area which must be removed prior to TfL beginning the Phase 2 works. These have not currently been taken into account by the applicant and must be addressed.

- Figure 5-4 of the Environmental Statement details the Scaffold Protection Fan proposed at Level 3.
 - Section A-A: The vertical support post is likely to conflict with TfL's existing plans to place a crane in this location, which will service piling operations and the ticket hall works.
 - Section B-B and C-C: There is concern that the 3m cantilever fan will restrict the crane operations during the installation of the northern plaza glazing.
- The applicant proposed to erect a hoist at the south-west corner of Centre Point tower and this area is within TfL's current hoardings as it has been 'stopped up' under the Schedule 7 Local Authority Planning Consent and is within the Crossrail Limits of Deviation. This area is required until 2015 for the construction of the station southern plaza entrance. Discussions are ongoing as to whether it is possible to release any part of this area to the applicant, but current plans show it will be used for storage of the glass plaza panels and has been included in the glazing subcontractor's contract.
- Figure 5-2 of the Environmental Statement is not in accordance with TfL's proposed hoarding layouts and construction sequences/programme as the land south of Centre Point will actually form part of the TCRSU Project site, so this arrangement will not be acceptable or possible and will need to be revisited.
- All traffic management must be coordinated with TfL to ensure that there is no compromise to site deliveries for TCRSU and that the opening of the southern plaza entrance, primary access and egress point to the new station, is not compromised. There is concern that additional site traffic movements will further congest an already busy area and may adversely affect Crossrail deliveries, lorry movements and have an impact on pedestrians.
- In addition to these issues above, further traffic modelling of the impacts of the proposed traffic management will be required. However, it is accepted that the appropriate models may not be ready for use within the timescales for deciding this application, and as such this modelling should form part of the Construction Management Plan. Consideration of the impacts of the traffic management on pedestrian flow may also be required for approval by TfL.

S106 Contributions and Community Infrastructure Levy (CIL)

- London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (July 2010) set out the mechanism for contributions towards Crossrail. The SPG states that contributions should be sought in respect of proposals for uplifts in floorspace for office, retail and hotel uses in central London where there is a cumulative uplift in such floorspace of more than 500sqm. This application proposes such

an uplift but as the application also includes a change of use from office to primarily residential use, given the floor areas involved in this instance no charge would be levied under the SPG.

- However, notwithstanding the above the Mayor of London introduced his Community Infrastructure Levy (CIL) on 1 April 2012. Most development that receives planning permission after this date will be liable to pay this CIL and the development is located in the London Borough of Camden, where the charge is £50 per square metre. Further details can be found at: <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>.
- In summary, although TfL have no objections to the principle of the application, some detailed issues around the public realm and construction need to be resolved. Please do not hesitate to contact me if you have any questions or need clarification on any of the points raised.

4.2 London Underground –

- Though we have no objection in principle to the above planning application there are a number of potential constraints on the redevelopment of a site situated close to underground tunnels and infrastructure. It will need to be demonstrated to the satisfaction of LUL engineers that:
 - The development will not have any detrimental effect on our tunnels and structures either in the short or long term
 - the design must be such that the loading imposed on our tunnels or structures is not increased or removed
 - we offer no right of support to the development or land
- Therefore we request that the grant of planning permission be subject to conditions to secure the following:

The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

 - provide details on all structures
 - accommodate the location of the existing London Underground structures and tunnels
 - accommodate ground movement arising from the construction thereof
 - and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2011 Table 6.1 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

- We also ask that the following informative is added: The applicant is advised to

contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; excavation; construction methods; security; boundary treatment; safety barriers; landscaping and lighting

4.3 Crossrail –

- Crossrail is a proposed new railway that will link Heathrow and Maidenhead in the west to Shenfield and Abbey Wood in the east using existing Network Rail tracks and new tunnels under Central London.
- The Crossrail Bill which was introduced into Parliament by the Secretary of State for Transport in February 2005 was enacted as the Crossrail Act on the 22nd July 2008. The first stage of Crossrail preparatory construction works began in early 2009. Main construction works have started with works to the central tunnel section to finish in 2018, to be followed by a phased opening of services.
- Crossrail Limited administers a Direction issued by the Department for Transport on 24th January 2008 for the safeguarding of the proposed alignment of Crossrail.
- The site of this planning application is identified within the limits of land subject to consultation under the Safeguarding Direction.
- The implications of the Crossrail proposals for the application have been considered and the detailed design of the proposed development needs to take account of the construction of Crossrail. Therefore if, as the Local Planning Authority, you are minded to grant planning permission for the development, Crossrail Limited are of the view that the following condition[s] should be applied:
 1. No works below ground level comprised within the development hereby permitted shall be undertaken at any time when Crossrail are undertaking tunnelling or shaft works within 100 metres of the land on which the development hereby permitted is situated, unless specifically agreed to in advance, and in writing, by Crossrail Limited.

4.4 English Heritage –

- Centre Point is a highly significant modern complex built around the familiar 35-storey tower. Since completion in 1966, its relationship to the road system at its base has never been successful, and the area around the complex remains blighted.
- The conversion of the tower to residential use is welcome, and the associated alterations to the façade and access arrangements at ground floor do not, in our view, harm the significance of the grade II listed building. In addition, we consider the proposals to the Bridge Link and Centre Point House to be acceptable in principle, and respond to the changed context resulting from the closure of the road and the creation of a new square.
- The redevelopment of the Intrepid Fox pub site will cause some harm to the listed building and surrounding conservation area. In accordance with national planning policy, the economic, social and heritage benefits that the proposals deliver overall will need to be balanced against that harm.
- Our statutory remit is the impact of the proposals on the significance of the historic environment. Our advice below is based on an understanding of the historic environment affected by the proposals, and an assessment within the

context of national planning policy as to whether the proposals harm, retain or enhance this significance, and whether there are public benefits that may outweigh any harm.

Significance of the Historic Environment

- The grade II listed Centre Point complex consists of three principal elements: Centre Point Tower; the Bridge Link; and Centre Point House. The site is situated within Denmark Street Conservation Area.
- The significance of Centre Point is well known, but in summary it lies principally in the distinctive architecture of the buildings and the historic context in which they were constructed. Centre Point's architect Richard Seifert was one of Britain's most prolific post-war architects, and the slender 35-storey tower, with its heavily modelled façade, is emblematic of 1960s op art in architecture. The other elements of the complex, whilst not as obviously significant as the tower, are integral to the whole and have some significance in their own right. The Bridge Link, for example, is significant for its early and innovative use of frameless glass, while Centre Point House is of some significance for its contribution to the layout of the complex, and for its *brise-soleil* facades. The pub at the southern end of the complex, although designed as a late addition, is of some interest in its own right for its design and its role in resolving the Earnshaw Street elevation.

Impact of the proposals on the historic environment

- The proposals seek to repair and restore the existing buildings, and provide them with new uses around a newly created public open space. This will entail a number of changes to the listed buildings. At Centre Point Tower, the principal changes relate to the introduction of new glazing, and an increase in the height of the glazing through the removal of the existing lower spandrels that currently hides the interior heating system. At ground floor, the existing exterior concrete entrance staircase will be relocated to the interior lobby, where it will be reused to form the access to the first floor. At the Bridge Link, the innovative exterior glazing will be restored, with the removal of the existing tinted film. At ground floor level, with the closure of the road, a fully glazed retail unit will be inserted beneath the soffit of the bridge. Centre Point House will be substantially restored, including the removal of inserted mezzanine floors within the commercial units. The existing curtain wall system, which is in poor condition and falls far short of contemporary thermal standards, will be replaced with a new system that broadly matches the lines of the original. The *brise-soleil* façade will be restored and the later spandrel bars removed.
- The most significant change is at the southern end of the site, where the existing Intrepid Fox pub is located. The proposals are for the demolition of the pub and the erection of a new seven storey extension containing affordable housing units. The design of the new extension is clearly contemporary, but is intended to tie in visually with Centre Point House.

Policy

- Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) sets out the obligation on local planning authorities to pay special regard to safeguarding the special interest of listed buildings, preserving their settings and preserving or enhancing the character or appearance of conservation areas.
- The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the

framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development.

- NPPF policy advises that for new development to be sustainable it needs to encompass an economic, social and environmental role, with the latter including the protection and enhancement of the built and historic environment. Paragraph 8 notes that these roles are mutually dependent and should not be taken in isolation; and that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.
- Paragraph 7 of the NPPF states that the environmental role of a development includes protection and enhancement of the historic environment, while section 12 sets out how the historic environment should be conserved and enhanced.
- Paragraph 131 states that, in determining planning applications, account should be taken of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; their potential to positively contribute to sustainable communities including economic vitality; and the desirability of new development making a positive contribution to the historic environment's local distinctiveness.
- Paragraph 132 gives great weight to conserving heritage assets in a manner appropriate to their significance, noting that significance can be harmed by development within the setting of a heritage asset.
- Paragraph 133 advises that, where a development would lead to substantial harm to or total loss of significance of a heritage asset, consent should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that all of the following apply: that the nature of the heritage asset prevents all reasonable uses of the site; no viable use of the asset can be found in the medium term through appropriate marketing; conservation through grant funding or charitable or public ownership is not possible; the harm or loss is outweighed by the benefit of bring the site back into use.
- Paragraph 134 sets out that, where a development proposal will lead to less than substantial harm to the significance of a heritage asset, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- Paragraph 137 states that local authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance.
- The London Plan sets out the Mayor's commitment to protect and enhance London's historic built environment, to promote conservation-led regeneration, and the re-use of redundant or under used buildings. It also sets out policies with aim to support culture and tourism and economic and social regeneration
- Camden's Core Strategy sets out an overarching commitment to safeguard the borough's heritage in CS14. Detailed policies for conservation areas and listed buildings are set out in DP25 of Camden's Local Development Framework. Camden's Denmark Street Conservation Area Appraisal describes the character of Denmark Street Conservation Area in detail, and helps inform decisions on proposals that affect the conservation area.

English Heritage Position

- We welcome the principle of the proposals, which seek to resolve the problems with the urban realm that have blighted the site since its construction in the 1960s. We accept that the conversion from office to residential will result in changes to some elements of the original design of the tower, for example the removal of external staircases.
- The loss of the Intrepid Fox pub element, and the introduction of a new seven storey building on the site, will introduce significant visual change to this part of the Centre Point complex. In our view, despite its comparatively modest significance, the pub site ties in visually with the complex as a whole, in particular the long elevation to Earnshaw Street which it terminates. The loss of this element will interrupt the consistency and clarity of Seifert's design. The proposed new development adds substantial bulk to this part of the site, and has an impact on some local views. In particular, we note that the impact on 'view 3' in the accompanying visual assessment documents demonstrates the nature of the harm described above.
- Overall, it is our opinion that the harm described above is 'less than substantial' and therefore needs to be assessed in accordance with NPPF paragraph 124, which states that where proposals cause less than substantial harm to designated heritage assets, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- In our view, there are very clear public benefits arising from the proposals, not least the creation of a new public space and the removal of vehicle traffic through the site. There are heritage benefits as well, including the restoration of the original *brise-soleil* elevations at Centre Point House.
- **Recommendation** - In our view, the proposals offer a range of public benefits that could outweigh the less than substantial harm to the listed building and surrounding conservation area set out above. Should your Council agree and be minded to support the proposals, we would urge you to ensure that these benefits are securely tied into the consents given.

4.5 English Heritage Greater London Archaeology Advisory Service

- The site lies in an area where archaeological remains may be anticipated as it is within a designated Archaeological Priority Area. This is due to the medieval settlement and hospital of St Giles in the Fields and the subsequent 17th and 18th Century inner city expansion. Archaeological deposits dating from the Roman period onwards have been found in the immediate vicinity with a particular emphasis on medieval and post medieval remains.
- The submitted assessment report has been able to demonstrate that it is unlikely that remains of national or higher importance are present on the site, however there are areas within the development site where archaeological deposits may survive and which will potentially be affected by the development proposals. Of particular note is the extension of the basement levels, which may affect deep cut features such as ditches, cess pits, soak aways and cellars.
- In accordance with the NPPF and LDF policies, a record should be made of the heritage assets prior to development.
- Condition recommended regarding the submission of a written scheme of investigation

4.6 Twentieth Century Society

- We have attended pre-application meetings with Rick Mather Architects and building owners Almacantar regarding this revised scheme, since the previous proposals were refused at planning committee in September 2012. The reasons for refusal of listed building consent were:
 1. The proposed glazing under the link bridge, by virtue of the infilling of the space would alter its appearance as a bridge and alter the composition of Centre Point as a whole, thus harming the special interest of the listed building.
 2. The proposed alterations to the building's facade, results in the loss of original fabric and alters the appearance of the building, thereby harming the architectural and historic interest of the building.
- The glazing under the link bridge referred to in reason 1 has been excluded from the submitted applications. The revised application submission has been reviewed by our advisory casework committee, and this letter constitutes the views of the committee.

Significance

- Located at the intersection of Charing Cross Road, New Oxford Street and Tottenham Court Road, Centre Point is one of London's most distinctive landmarks. The site comprises Centre Point Tower, Centre Point House, the connecting link bridge and the fourth element of the ensemble, Intrepid Fox pub site. The site is located within the Denmark Street Conservation Area, with Bloomsbury Conservation Area lying immediately adjacent to the site to the north of New Oxford Street. The site is grade II listed, and identified as a designated heritage asset under the National Planning Policy Framework (NPPF).
- Centre Point's bravado and high level of detailing makes it one of the finest of the tower blocks built to the designs of Richard Seifert and George Marsh in the 1960s. It is widely recognised as the one of the finest most important speculative office building of its time, and was added to the statutory list in 1995 for its architectural interest and innovation. Not only is the tower itself of interest, but also its relationship with the link and rear block, each element individually expressed to identify its function. It is also the only listed building by this highly influential firm.
- Centre Point was both technically and architecturally pioneering; it was the first tall building in England to use precast concrete components and also the first not to require scaffolding. Centre Point is also important for initiating the shift away from the plain glass curtain wall trend, which dominated the commercial tower block sector. Centre Point's flamboyant sculptural architectural treatment can be accredited for significantly contributing to a more imaginative language in corporate architecture.

Policy context

- Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to its conservation. It adds that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional.
- Paragraph 133 states that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

Denmark Street Conservation Area

- The site lies within a Conservation Area, and as such the proposals should be viewed in terms of their impact not only on the listed building, but also the character of the conservation area - which is a designated heritage asset. The Denmark Street Conservation Area Appraisal and Management Strategy states:
 - “The conservation area hosts a variety of built forms. New designs should respect the scale and layout of the particular location, and complement the appearance, character and setting of the existing buildings and structures, historic street pattern, areas of open space, and the environment as a whole” (para 6.1).

The Proposals

- In terms of a comparison between the refused scheme and the submitted schemes, aside from the public realm element, the major difference between the two is the proposed redevelopment of the Intrepid Fox site. This and other points are addressed below:

Intrepid Fox site

- The Twentieth Century Society considers that despite the later ground floor extension, the Intrepid Fox building is of architectural significance. The podium arrangement which accommodates Centre Point House is extruded out from the slab block- typical of Corbusian style design of the 1950s and 60s. The two storey element is separated from the curtain walling of the residential element, and terminates the Centre Point site neatly at first floor level with set-back timber framed windows at the approach from St Giles High Street, and respects the scale of St Giles Church (grade I listed) opposite. While there is clearly scope for alteration at ground floor level, the massing of the two storey element is crucial for providing key views of the Centre Point site on the approach from St Giles High Street.
- The demolition of the whole pub building and the new eleven storey (including basement) building will introduce a new bulky mass which would be higher than Centre Point House and be read as a crude extension to this part of the grade II listed complex. The 11 storey extension is out of character with the rest of the buildings and is bulky and over-scaled. It would also cause significant visual harm by blocking views of glazed stairwells which articulate and add interest to the flank wall of Centre Point House.
- In policy terms, we consider the 11 storey extension to cause substantial harm to the grade II listed complex of buildings. In addition, the proposed 11 storey building would also cause substantial harm to the character of the conservation area, and thus a designated heritage asset in its own right. Such harm under the terms of para 132 should be exceptional, and should be clearly and convincingly justified. We do not believe the loss of the pub and its replacement meet this criteria. Nor do we consider that the proposals meet the policy criteria set out in paragraph 133. We do not consider that this element of the scheme would deliver substantial public benefits that outweigh the harm to the designated heritage assets.

Centre Point House facades

- Members of our advisory casework committee noted with regret that the proposed replacement of the façades of Centre Point House would result in the loss of almost the entire existing historic 1960s curtain walling, and would result in substantial harm to the designated heritage asset. The committee appreciated the requirement for better thermal performance from the building facades, but it was felt that the proposed replacement did not appear to respond to the style, character, and colour of the original. It felt that a more conservation orientated approach might suggest other solutions and that to date insufficient justification had been submitted to support this level of intervention and loss of historic fabric.
- As submitted, the proposals do not differ from those submitted in the previous, refused application. As such we maintain our objection to this aspect of the proposals, and we consider the previous reason for refusal (No. 2) is still relevant in this case.

Projecting Stair and external bench

- These proposals have not changed since the last application, and as such our view on this element remains the same. The Society views the external cantilevered staircases as expressive and sculptural features that are an essential and dramatic part of the building. We strongly object to their removal and relocation within the building. We understand that the front stair is already compromised by the Crossrail proposals and thus it is of added importance that the rear stair is maintained in its current original position. The associated external bench forms part of the sculptural composition of the tower, along with the stair and should remain in-situ as public seating.

Other details

- Through meetings with the architects and applicant, we have resolved other minor issues such as the detailing of the brise-soleil and the spandrel panels of the Centre Point Tower facades. Members felt comfortable with the level of further justification provided by the applicants to justify these alterations.

Conclusion

- Overall, we consider the loss of the Intrepid Fox pub and the replacement 11 storey tower would result in substantial harm to this complex of listed buildings, as well as the Denmark Street Conservation Area. We also object to the large-scale loss of historic fabric on Centre Point House, and we do not consider the previous reason for refusal has been adequately addressed in this revised application. We also maintain our objection to the relocation of the external stairs, which are expressive and sculptural features of the building and plan form. As such, the Twentieth Century Society strongly objects to the proposals.

4.7 Thames Water – No objection and have recommended a number of informatives regarding the timing of the emptying of the pool; installation of fat traps; groundwater discharge permit; water pressure and water metering.

4.8 City of Westminster – have confirmed that they have no comments.

Conservation Area Advisory Committee

4.9 No comments received

Local Groups

4.10 Bloomsbury Baptist Church

- Supports the conversion of this property from office to residential accommodation
- Concerned at the limited numbers of affordable housing units. Understand that the current proposal contains either 8 or 16 affordable units to be created on the site of the Intrepid Fox pub and the cost to the developer of these units is such that they could build 64 purpose built affordable units elsewhere.
- The church is aware of LBC's affordable housing policies and was delighted with the final outcome achieved on the St Giles Court development. We know that the Council would prefer to see a mix of affordable and other types of residential accommodation on site, but in this instance we believe that the small number of units on the site of the Intrepid Fox will yield far too little affordable local accommodation. There are plenty of potential sites for building aff homes and that some of these, such as the West Central Post Office site, are close to Centre Point.

4.11 Soho society

Support the provision of affordable housing on site

4.12 St Giles Church

Object to redevelopment of the Intrepid Fox part of the site for the following reasons:

- Impact on the setting of St Giles Church and the Conservation Area caused by the height and proximity; massing, bulk and size; projection of the building line towards church; handling of the scale on the facades; impact on aspect towards the church; and impact on aspect from the church.
- Visual enclosing/blocking of the gap between Denmark Street and Central St Giles especially viewed from Denmark Street and Flitcroft Street
- No inclusion of new public realm within the planning application
- Low level of affordable housing provision and segregation/cramming of affordable housing units on one part of the site

Adjoining Occupiers

<i>Number of letters sent</i>	319
<i>Total number of responses received</i>	119
<i>Number in support</i>	96 (82 are a standard letter) Plus 8 to the EIA scoping application
<i>Number of objections</i>	23 Plus 2,217 to the EIA scoping application

4.13 A press notice was in place between 2 and 23 May. Ten site notices were erected between 24 April and 15 May. Letters were sent to 319 residents on 19 April for both applications.

4.14 2,225 separate responses were received to the application for an EIA scoping response which was submitted on 21 February (7 weeks before the planning application was submitted). Given the fact that both applications were submitted at similar times and as these responses all relate to the proposed development and

not the content of the EIA they have been considered as part of the assessment of the planning applications and are summarised below:

Address of respondents

- London – 967
- Rest of UK - 1010
- Europe/ rest of world - 83 (1 Tenerife. 13 Italy, 9 Norway, 1 Guernsey, 2 Jersey, 8 Spain, 8 Australia, 5 Germany, 4 France, 2 Poland, 6 Sweden, 9 USA, 2 South Africa, 2 Belgium, 2 South America, 4 Japan, 1 Holland, 1 Hungary, 3 Finland)
- Unknown (address not clear) 73

8 Support for the following reasons:

- Good location for flats and in dire need of more housing
- General support
- The pub ruins the environment and causes noise disturbance and am in favour of it closing down
- Would be good if the ground floor could be consistent with the musical/art surroundings in Denmark Street as wiping away 'Tin Pan Alley' would be a mistake
- Agree with the change of use of the tower from offices to residential

2217 individual objections and comments for the following reasons:

- Object to the closure of the Intrepid Fox
- The Intrepid Fox is the only rock pub in central London, is an iconic establishment that provides a much needed focal point for the alternative community and for music culture
- The pub should not be closed to help landowners make money and to be turned into housing that only the rich can afford.
- Places like the Intrepid Fox are what makes London unique and its redevelopment would homogenise the area and lose the character, diversity, vibrancy and charm of the area
- There is no need for any more retail and restaurant uses in the West End, but there is a need for this unique pub
- The Intrepid Fox is a valuable place for small bands to play, is one of the last meeting points for those in the alternative community,
- Do not need more soul less chain/franchise restaurants, coffee shops or shops in London.
- The area has already lost a number of venues such as the Astoria, Mean Fiddler and Sin Club and should not lose any more.
- The developer should find a suitable new venue within a short distance of the site for the Intrepid Fox
- The Intrepid Fox is part of Soho and its history
- The provision of 'affordable' housing is questionable in this part of Central London
- The Intrepid Fox attracts visitors to the area and therefore supports other local businesses

4.15 In response to the planning applications 23 comments and objections were received from 4 x Matilda Apartments, 1 x Earnshaw Street; 7 x St Giles High

Street; 2 x Centre Point: 1 x New Oxford Street; 1 x High Holborn: 1 x Shaftesbury Avenue; 1 x Portman Street; 1 x Golden Manor Drive (Essex); 1 x Cowcross Street; 1 x The Sycamores Milton (Cambridge); 1 x Tabernacle Street; 1 x Burnham Way; 1 x Queen Anne Street as follows:

Uses

- Loss of tourist attraction (high level viewpoint and restaurant)
- Loss of employment associated with change of use
- Loss of the Intrepid Fox
- Loss of commercial uses including B1/A3/A4 within central London location and CAZ
- Loss of office space will harm local business

Affordable housing

- Need affordable housing provided on site
- Support the affordable housing provision on site
- Low level of affordable housing being provided
- Affordable housing should be 2 bed units
- Need affordable housing within the tower
- Poor quality accommodation

Design

- Scale, size, bulk, detailed design, relationship to wider context of proposed replacement building terminating height
- Harm adjacent listed buildings
- Internal alterations to centre point
- Cladding to external façade of proposed building
- Proposed replacement building terminating height

Amenity

- Loss of light to neighbouring residential units
- Unsuitable proposed uses adjacent to residential uses
- Noise and disturbance from proposed uses and associated servicing
- Loss of public amenity
- Loss of residential and commercial amenity – light, ventilation
- Outlook from adjoining residential properties
- Noise nuisance associated with building works

Transport

- Public realm improvements/renewal
- Pedestrianisation of area
- Determination should be held in abeyance until Crossrail complete
- Relocation of bus stop and implication (noise disturbance) upon adjacent residential amenity
- Loss of parking spaces

Other

- Manner of consultation, dialogue and submission details of applicant with residents/businesses

- 4.16 96 letters of support have been received (82 of which are a standard letter) from 1x New Oxford Street, 2 x Centre Point House; 2 x Centre Point; 1 x St Giles High Street; 6 x Parnell House, Streatham Street; 5 x Shaftesbury Avenue; 3 x Bedford Court Mansions; 1 x Bloomsbury Street; 4 x Charing Cross Road; 3 x Denmark Street; 13 x Matilda Apartments, Earnshaw Street; 18 x Dudley Court, 36 Endell Street; 2 x Great Russell Street; 12 x Greese Street; 7 x Pendell House, New

Compton Street; 3 x New Oxford Street; 2 x Cleveland Street; 2 x Dean Street; 1 x Carlow Street; 1 x South Crescent; 1 x Albany Street; 1 x Foley Street; 1 x Newman Street; 1 x Adeline Place; 1 x Unknown as follows:

- Redevelopment/demolition of the Intrepid Fox
- Provision/change of use of commercial to residential uses in this location
- Public realm improvements/renewal associated with Crossrail
- Provision of affordable housing in this location
- Alterations to prominent building (centre point)
- Safeguard the listed building (centre point)
- Provide additional jobs for wider area

5. POLICIES

5.1 LDF Core Strategy and Development Policies

CS1 – Distribution of growth

CS2 – Growth areas

CS5 – Managing the impact of growth and development

CS6 – Providing quality homes

CS7 – Promoting Camden's centres and shops

CS8 – Promoting a successful and inclusive Camden economy

CS9 – Achieving a successful Central London

CS10 – Supporting community facilities and services

CS11 – Promoting sustainable and efficient travel

CS13 – Tackling climate change through promoting higher environmental standards

CS14 - Promoting high quality places and conserving our heritage

CS15 – Protecting and improving our parks and open spaces and encouraging biodiversity

CS16 – Improving Camden's health and wellbeing

CS17 – Making Camden a safer place

CS18 – Dealing with our waste and encouraging recycling

CS19 – Delivering and monitoring the Core Strategy

DP1 – Mixed use development

DP2 – Making full use of Camden's capacity for housing

DP3 – Contributions to the supply of affordable housing

DP5 – Homes of different sizes

DP6 – Lifetime homes and wheelchair homes

DP10 – Helping and promoting small and independent shops

DP12 – Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses

DP13 – Employment premises and sites

DP15 – Community and leisure uses

DP16 – The transport implications of development

DP17 – Walking, cycling and public transport

DP18 – Parking standards and limiting the availability of car parking

DP19 – Managing the impact of parking

DP20 – Movement of goods and materials

DP21 – Development connecting to the highway network

DP22 – Promoting sustainable design and construction
 DP23 – Water
 DP24 – Securing high quality design
 DP25 – Conserving Camden's heritage
 DP26 – Managing the impact of development on occupiers and neighbours
 DP27 – Basements and lightwells
 DP28 – Noise and vibration
 DP29 – Improving access
 DP30 – Shopfronts
 DP31 – Provision of, and improvements to, open space and outdoor sport and recreation facilities
 DP32 – Air quality and Camden's clear zone

5.2 **Supplementary Planning Policies**

Planning Framework for the Tottenham Court Road Station and St Giles High Street Area (July 2004)
 Revised Planning Guidance for Central London: Food, Drink and Entertainment, Specialist and Retail Uses (Adopted 04/10/2007).
 Denmark St Conservation Area Appraisal and Management Strategy (March 2010)
 Camden Planning Guidance (April 2011)
 National Planning Policy Framework (2012)

5.3 **Other material documents**

Town and Country Planning (EIA) (England and Wales) Regulations 1999
 St Giles to Holborn draft Place Plan (November 2012)
 LDF site allocations (Modified submission document, March 2013)
 St Giles Urban Realm – summary design report & Stage E report (November 2011)
 Camden Statement of Licensing Policy 2011

6. **ASSESSMENT**

6.1 The principal consideration material to the determination of this application are summarised as follows:

- Land use (employment floorspace, residential units, affordable housing, access to upper floors, existing public house use, restaurant uses)
- Demolition / listed building / design
- Transport implications
- Amenity impacts
- Other matters – sustainability, CIL, basement extension, wind

It should be noted that a viability briefing meeting was held with Development Control Committee members, the Head of Development Management and Council officers and their consultants on 13 June 2013. This was held to inform Members of the key issues regarding viability, prior to the applications being formally considered by the Development Control Committee. All Members of the Development Control Committee were invited and six Members attended the meeting.

An Environmental Statement was submitted with the application. The Council

considers that it was not required as the development does not a full Environmental Impact Assessment, but the information submitted has still been assessed as part of this application and forms part of the assessment below.

6.2 **Land Use**

6.2.1 **Employment floorspace**

Policy CS8 seeks to ensure that the borough retains a strong economy. It seeks to do this by, amongst other things, safeguarding existing employment sites that meet the needs of modern industry and employers. Policy CS8 also states that the Council will consider proposals for other uses of older office premises if they involve the provision of permanent housing (in particular, affordable housing) and community uses. Policy DP13 seeks to implement the priorities outlined in CS8 and states that the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business use unless it can be demonstrated that the site is no longer suitable for its existing business use, and there is evidence that the possibility of re-using or redeveloping the site for alternative business use is not viable. CPG5 (Town Centres, Retail and Employment) identifies a number of considerations that will be taken into account when assessing applications for a change of use from office to a non business use (in addition to criteria in DP13).

6.2.2 The National Planning Policy Framework (NPPF) states at paragraph 51 that Local Planning Authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate. From 30 May 2013 permitted development rights were extended to allow change of use of a building from offices to residential. Buildings lying within the Central Activities Zone are exempt from this. As the site is located within the Central Activities Zone these permitted development rights are not applicable.

6.2.3 Given the amount of employment floorspace involved with this application and the potential numbers of people employed in the building (27,516sqm with a conference facility within the bridge link and approximately 1,250 people employed) the applicant has submitted information with regard to the DP13 and CPG5 criteria, and an Economic Assessment.

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

- **Located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing** - The site is not located in or adjacent to the Industry Area and as the site is located at the junction of Oxford Street and Charing Cross Road/Tottenham Court Road, it is not suitable for large scale general industry and warehousing.
- **Is in a location suitable for a mix of uses including light industry and local distribution warehousing** - The site is in a location suitable for a mix of uses including retail, leisure, residential and Class B1 office use but is not located in an area suitable for light industry and local distribution warehousing.
- **Is easily accessible to the Transport for London Road Network and/or London**

Distributor Roads - The site is easily accessible to the Transport for London Road Network but the roads in this part of London are predominantly occupied by buses, taxis and cars.

- **Is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water** - The site is accessible by Underground, buses, taxi and cycle but does not have the potential to be serviced by rail or water.
- **Has adequate on-site vehicle space for servicing** - The site has on-site vehicle space for servicing at basement level from the existing ramp on Earnshaw Street. This access however, has a height restriction and only small servicing vehicles can access the basement.
- **Is well related to nearby land uses** - The site is located in the Central Area Zone, at the important junction of Tottenham Court Road/Charing Cross Road and Oxford Street. It is extremely well located and is in an area with a concentration of office and employment uses.
- **Is in a reasonable condition to allow the use to continue** - The existing office floorspace is considered to be of poor quality which does not meet modern occupier requirements. Throughout its history Centre Point Tower has almost never been substantially let. The Economic Assessment concludes that the existing building is reaching the end of its economic life, requires substantial investment in its fabric to ensure that the future of this listed building can be secured and this level of investment cannot be generated by continued office use (see paragraph 6.2.5)
- **Is near to other industry and warehousing, noise/vibration generating uses, pollution and hazards** - The site is not located close to other industry and warehousing uses and noise/vibration generating uses, pollution or hazards.
- **Provides a range of unit sizes, particularly those suitable for small businesses (under 100sqm)** – Existing tenants predominantly occupy a single floor equating to approximately 420sqm, and a few floors have been partitioned to provide smaller units of approximately 185sqm. The Economic Assessment provides more information on the fact that the smaller occupiers tend to be higher risk in terms of lease length and covenant strength which has a direct impact upon revenues.

CPG5

- **The age of the premises (some older premises may be more suitable to conversion)** - The building was constructed in the 1960s and does not appear to meet modern office occupier requirements. The building is however, particularly suited to conversion to residential use.
- **Whether the premises include features required by tenants seeking modern office accommodation** – In spite of the Central London location the premises does not include features required by tenants seeking modern office accommodation; the floor to ceiling heights are already restricted and a Grade A refurbishment would further reduce this by around 500mm; the energy performance of the building is poor. This is set out in more detail in the Economic Assessment
- **The quality of the premises and whether it is purpose built accommodation (poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion)** – Whilst the buildings were purpose built office accommodation the Economic Assessment and the Design and Access Statement provides information to show that the building requires significant investment to secure its future, but even with a significant amount of

investment in its fabric and services, the building cannot be brought up to Grade A specification.

- **Whether there are existing tenants in the building, and whether these tenants intend to relocate** - There are existing tenants within the buildings but generally these are on short leases.
- **The location of the premises and evidence of demand for office space in this location** - The building is located in the CAZ and there is significant demand for office space in this location but the demand in the west end is predominantly for Grade A office space. The Economic Assessment confirms that there is approximately 113,000sqm of office accommodation in the pipeline and approximately 83,612sqm of second hand space available to lease in Noho / Soho / Bloomsbury area.
- **Whether the premises currently provide accommodation for small and medium businesses** - Existing tenants predominantly occupy a single floor equating to approximately 420sqm, and a few floors have been partitioned to provide smaller units of approximately 185sqm. The Economic Assessment provides more information on the fact that the smaller occupiers tend to be higher risk in terms of lease length and covenant strength which has a direct impact upon revenues.

6.2.5 This issue was not a reason for refusal of the last planning application. There have been no significant policy changes and the site context has not changed since the last application. An Economic Assessment was submitted with the previous application and this has been updated for the current application. These documents examine the office accommodation in the building in relation to whether it is 'functionally obsolete' and whether it is economically viable to retain. The Council has employed BPS Chartered Surveyors to independently review the information in the Economic Assessment and consequent update. BPS have tested extensively the assumptions made in relation to the income and expenditure projections over the next 10 years and have reviewed the supporting information. BPS have also requested additional information and asked for amendments to the assumptions, including estimated projected returns over a longer 25 year period; amendments to the cash flow models and a reduction to net expenditure forecasts. BPS have advised that they are satisfied with the amended appraisals, forecasts, assumptions and inputs. They also agree with the applicant's conclusion that the building is reaching the end of its useful life (as offices); requires substantial investment in its fabric to ensure that the future of this listed building can be secured; and that the income generated from continued office use is insufficient to provide an adequate return on the investment. The overall conclusion is that the proposed change of use is warranted on economic grounds.

6.2.6 The proposed loss of B1 office floorspace is considered to be acceptable and appropriate given the site context and information submitted with the Economic Assessment. A financial contribution of £915,993 has been secured to provide training and employment support and to mitigate the loss of employment opportunities for Camden residents.

6.2.7 Residential

Policy CS6 relates to a wide range of housing, including permanent self-contained housing. The general approach outlined in CS6 aims to make full use of Camden's

capacity for housing. The Council encourages the creation of additional residential accommodation provided that it meets acceptable standards.

Within the Tower:

- All flats would be accessed via a new entrance and reception area at ground and mezzanine level using the two existing lift cores.
- Each flat would be entirely self contained, would have adequate light and ventilation and would meet the CPG floorspace standards.
- There are a number of single aspect units within the Tower. Given the fact that this is largely a conversion, that the single aspect units would either face east or west (and are not north facing) and that the flats are of a generous size it is considered that the inclusion of these single aspect units is acceptable.
- No amenity space is proposed in the form of private balconies or roof terraces, give the fact that this is the conversion of a listed building with the provision of new public realm at ground floor level this is considered to be acceptable.
- The scheme does provide ancillary residential uses at first floor level in the form of a gym, pool and spa and this space is welcomed.

For the new build affordable units:

- All flats would be accessed via a new entrance at ground level with a new lift and stair core.
- Each flat would be entirely self contained, would have adequate light and ventilation and would meet the CPG floorspace standards.
- Seven of the 1bed units are single aspect and are west facing. The remaining six units (the family size units) are dual aspect with the 3b units all facing are east and south and the 4b units having windows on all elevations (east, west and south).
- Each unit has a balcony or small terrace, with the duplex 3b units having 2 balconies each.

6.2.8 The LDF site allocations (October 2012) document states that development within the 'St Giles Circus' site is expected to appropriately restore, convert and redevelop buildings and sites to include a mix of uses appropriate to a Central London location including retail, residential (including affordable housing), offices and leisure.

6.2.9 Policy DP5 seeks to provide a range of unit sizes to meet demand across the borough. In order to define what kind of mix should be provided within residential schemes, Policy DP5 includes a Dwelling Size Priority Table and the expectation is that any private housing scheme will meet the priorities outlined in the table and will provide at least 40% 2 bed units. The inclusion of 45% of two bed units (37 units) in the scheme and 35% larger units (26 x 3bed and 3 x 4 bed) is therefore considered acceptable. For social rented housing schemes the expectation is that at least 50% larger family units (3b+) will be provided. Given the site's constrained floorplate, the inclusion of 38% of larger units (5 units) in the affordable housing block is considered acceptable.

6.2.10 Policy DP6 requires all new dwellings be designed to meet Lifetime Homes standards. A lifetime homes assessment has been submitted with the applications and which shows that it is possible to meet all the 16 criteria. Policy DP6 (Lifetime

Homes) states that 10% of homes development should either meet wheelchair housing standards or be easily adapted to them. If all of the criteria cannot be met a 'best endeavours' exercise should be undertaken by the applicants to justify the reasons why the development cannot meet the criteria. The proposal is for 8 units within the tower to be easily convertible to wheelchair accommodation and this is considered acceptable. It was not possible to provide a large enough unit within the affordable housing block to accommodate the relevant wheelchair turning circles, without losing a larger family size unit. A condition is recommended requiring the provision of further details to show compliance with lifetime homes and wheelchair housing requirements.

6.2.11 CPG guidance requires the provision of 9 sq m of open space per person for residential developments providing 5 or more additional dwellings. Open Space provision will initially be expected to be provided on site. Where a site cannot provide open space provision on site the preferred option would be to provide suitable open space off-site, but at a maximum of 400m from the development. If either of the above are not practical a financial contribution to open space will be acceptable and this is calculated in line with the formula in CPG6. The contribution expected for this development would be £148,259 and this will be combined with the Public Realm contribution (see paragraphs 6.4.3-6.4.8) and secured with a S106 legal agreement.

6.2.12 All residential developments involving a net increase of 5 or more units will normally be expected to provide a contribution towards education provision in the Borough (excluding any affordable elements of a housing scheme). The contribution sought is proportionate to the size of dwellings proposed, and is not sought for single-bed units, as these are unlikely to house children. The financial contribution is calculated in line with the formula in CPG8. The contribution expected for this development would be £310,735 and this will be secured with a S106 legal agreement.

6.2.13 Policies CS10 and DP15 aim to support community facilities and state that the Council will require development that increases the demand for community facilities and services to make appropriate contributions towards providing new facilities or improving existing facilities. The contribution expected for this development would be £1,023million for community facilities in the vicinity, to be agreed by the appropriate Cabinet Member in consultation with Ward Cllrs and this will be secured with a S106 legal agreement. All spend against this award will be made in accordance with the London Borough of Camden's Scheme of Delegation.

6.2.14 **Affordable housing**

Policy CS6 expects all developments with a capacity to provide 10 units or more (or 1,000sqm GEA or more) to make a contribution to affordable housing. Policy DP3 expects the affordable housing contribution to be made on site, but where it cannot practically be achieved on site the Council may accept off site affordable housing or exceptionally a payment in lieu. Policy DP3 states that the Council will negotiate the development of individual sites to seek the maximum reasonable amount of affordable housing on the basis of an affordable housing target of 50% of the total addition to housing floorspace. With the provision of 95 residential units (82 units in the tower and 13 units at the Intrepid Fox) and 29,790sqm (27,613sqm in the tower

and 1,882sqm at the Intrepid Fox) of residential floorspace the requirements of these policies have been triggered. It should be noted that the policy requirement is therefore for 14,895sqm of affordable housing floorspace on site, which expressed as a target number of units would be approximately 41 residential units.

6.2.15 DP3 goes on to list six criteria to be taken into account when assessing whether affordable housing can practically be provided on site as follows:

- Access to public transport, workplaces, shops, services and community facilities;
- The character of the development, the site and the area;
- Site size and constraints on including a mix of market and affordable tenures;
- The economics and financial viability of the development including any particular costs associated with it;
- The impact on the creation of mixed and inclusive communities; and
- Any other planning objectives considered to be a priority for the site.

The supporting text for this policy lists at paragraph 3.14 additional criteria to be taken into account which in summary are any physical constraints of the site; service charges which would be too costly; particular development costs; timings for affordable housing funding; and whether an off site contribution will maximise the overall delivery of housing and affordable housing.

6.2.16 The National Planning Policy Framework (NPPF) states at paragraph 50 that Local Planning Authorities should plan for a mix of housing based on current and future demographic trends; and identify the size, type, tenure and range of housing that is required. It also states that where a need for affordable housing is established, policies should be set for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

6.2.17 The LDF site allocations (October 2012) document states that development within the 'St Giles Circus' site is expected to maximise the potential of sites to provide new housing (including affordable housing) while minimising potential conflicts between residential and other uses.

6.2.18 In line with policy DP3 the assessment of the affordable housing provision has focused on whether there are any physical reasons why more affordable housing cannot be provided on site; whether there are any management/service charge reasons and whether there are any viability reasons (including whether the overall offer would be better with off site provision).

6.2.19 When the previous application was submitted there was no affordable housing provided on site, as the applicant felt that a more meaningful contribution towards affordable housing could be created with a S106 financial contribution of £20.3million. During the assessment of the previous application, ten affordable housing units were proposed to be 'pepper potted' in Centre Point House along with a £12.8million S106 financial contribution. At the time that the previous application was assessed by DC committee (September 2012), there were a number of areas where agreement had yet to be reached with regard to viability

matters. Specifically:

- there were works proposed to Centre Point House which, in the absence of further information, appeared to not be essential to the scheme;
- there was an initial difference of opinion between the applicant and BPS as to what the 'base value' (benchmark) of the site should be;
- there were potential changes to the mix of one or two floors which BPS considered could increase the value of the development (and still be in line with policy DP5);
- the impact on the values of the private units from the inclusion of affordable housing units in the Tower had yet to be agreed.
- With these uncertainties it was difficult to reach a conclusion regarding whether the proposed ten units was the maximum reasonable amount of affordable housing that could have been provided on site.

Consequently one of the reasons for refusal for the previous application was:

"In the absence of sufficient justification for the shortfall in provision of on-site affordable housing and why it is not currently possible to deliver affordable housing off site, in accordance with the Council's affordable housing target, the development fails to contribute the maximum reasonable amount of affordable housing, contrary to policy CS6 (Providing quality homes) of the London Borough of Camden Local Development Framework Core Strategy and policy DP3 (Contributions to the supply of affordable housing) of the London Borough of Camden Local Development Framework Development Policies and policies 3.8, 3.9, 3.11, 3.12 and 3.13 of the London Plan July 2011."

6.2.20 The scheme now includes the redevelopment of the Intrepid Fox public house to provide 13 affordable housing on site (1,882sqm or 7%) with the following mix: 8 x one bedroom, 3 x three bedroom and 2 x four bedroom. The 3 and 4 bed units are proposed to be social rented units and the 1 bed units are proposed to be affordable rent. This is considered acceptable because this achieves the maximum amount of larger units at more accessible social rents and meets a priority housing need. A S106 legal agreement is proposed to secure these units. Because the total provision is some way under the policy target the physical, management and viability issues will now be taken in turn.

6.2.21 **Physical matters**

During the assessment of the previous application Council officers concluded that there was not any strong justification provided as to why it would not be physically possible to provide both affordable and private units within Centre Point Tower or Centre Point House. With the current application officers have again explored whether affordable housing units could physically be provided in either the tower or Centre Point House, and have reached the same conclusion.

6.2.22 **Management issues**

Policy DP3 acknowledges that there may be situations where the management or service charges of an on site scheme would be too costly for affordable housing providers or occupiers to meet. As part of the assessment of the previous application it was not clear whether service charges for the Tower had been adjusted to take into account of the fact that any affordable housing units in the tower would not be contributing towards services provided for the private tenants

(gym, pool, spa, concierge, larger ground and mezzanine reception area). The current application is for a self contained affordable housing block with its own separate service charge and this issue is no longer applicable. It is likely that service charge levels in the tower and Centre Point House would be more than in the proposed self contained block. Should any affordable housing units be provided in the Tower there would also be additional impacts on the values of the private residential units and consequent impacts on the viability.

6.2.23 *Viability issues*

During the assessment of the previous application the viability of the scheme was considered with two alternative scenarios for the provision of 50% affordable housing on site and 50% office floorspace. The report concluded that neither option was viable. The Financial Viability Assessment has been updated for this application to take into account the changes to the scheme and any other relevant changes (e.g. updated sales comparables and construction costs). The Council has again employed BPS to independently review the information in the updated Financial Viability Assessment.

6.2.24 Further information has been provided since the application was submitted with regard to construction costs and a number of anomalies raised by BPS have been clarified. The applicant's Financial Viability Assessment concludes that there is £6,507,228 available for S106 financial contributions alongside the 13 affordable housing units on the Intrepid Fox. BPS have advised that the methodology adopted by the applicant is sound; the inclusion of the works proposed to Centre Point House has been justified; an updated benchmark value which takes account of the acquisition of the Intrepid Fox has been agreed with BPS; and the proposed mix of key floors in the tower and the associated impact on values has been justified.

6.2.25 The applicant explored the provision of affordable housing on other sites as part of the previous application and a total of fifty seven sites were looked at, including one Council owned site. These were all discounted for various reasons. Since the last application the use of the financial contribution for the provision of affordable housing units elsewhere in the Holborn and Covent Garden ward has been explored by Council officers, in order to assess whether a more meaningful contribution towards affordable housing could be created with the off site provision of affordable housing units. It has not proved possible to provide more affordable housing units at an off site location.

6.2.26 *Deferred payments*

The Financial Viability Assessment has been modelled using both a present day basis and assuming growth in key cost and value appraisal inputs. The results of the appraisals suggest that only the growth scenario can generate sufficient returns to be considered potentially viable. The present day model does not support any S106 financial contributions or affordable housing on site.

6.2.27 The use of the present day basis is a more usual approach and deferred financial contributions would then normally be secured with a S106 legal agreement, following a financial re-appraisal of the scheme. RICS guidance is that the use of the growth model for larger, complex schemes of this nature is an accepted

alternative approach to the use of the present day and re-appraisal approach with deferred contributions. GLA and Camden policies do not specify which method should be used with GLA policy 3.12B and Housing SPG stating that negotiations on sites should take account of provisions for re-appraising the viability of schemes prior to implementation, and Camden policies CS6 and DP3 staying silent on this point.

6.2.28 Officers have sought a legal opinion on this point and have been advised that it would be unreasonable for the Council to negotiate a deferred contribution if the growth model has already been used in the Financial Viability Assessment. By factoring in growth into the financial model the applicant has been able to provide affordable housing units on site and is taking all the risk that the predicted 'growth' will happen. If the 'growth' does not occur the Council will not lose any of the S106 financial contributions or on site affordable housing units (unless the applicant applies to vary the terms of the S106 in the future, in which case the Council retains the decision making power). If the present day scenario is modelled the risk is shared between the Council and the applicant as to whether any 'growth' will occur and whether there will be any deferred financial contributions.

6.2.29 In conclusion, given the caveats in policies CS6 and DP3 which allow for the economics and financial viability of a development to be taken into account, officers consider that the policy tests have been demonstrated to justify the provision of 13 affordable housing units on site. The amount of affordable housing and the mix of units that can be provided on site is considered acceptable and compliant with policy.

6.2.30 Access to upper floor restaurant/bar

It was recognised during the assessment of the previous application that the existing public access to the 31st, 32 and 33rd floors provides a unique attraction with the available views from the restaurant and bar areas. Consequently one of the reasons for refusal for the previous application was:

"The proposed conversion of the Restaurant/Bar on the 31st, 32nd and 33rd floors of the tower to residential uses would result in a tall building without any publicly accessible areas on the upper floors, contrary to Policy 7.7(C) of the London Plan".

Objections have been received to the amended application regarding the loss of the restaurant/bar at 31st, 32nd and 33rd floor levels in the Tower and the consequent loss of this as a public space.

6.2.31 Permission was granted for the change of use of the 31st and 32nd floors to restaurant and bar use in February 2006 and for the change of use of the 33rd floor from a viewing gallery ancillary to B1 use to a mixed use and restaurant and bar in January 2007 (see relevant history). A Servicing Management Plan was secured with both applications to ensure that deliveries and servicing of the restaurant/bar occurs during 'out of hours' times, to avoid peak lift times and consequent impacts on the office use of the rest of the building. The existing restaurant/bar is accessed at ground floor via the external staircase with a reception area at mezzanine level. One lift is used for visitors to access the restaurant/bar, although this is not a dedicated separate lift and is shared with the office workers. Visitors normally have to have a reservation for the restaurant or bar area, although walk in trade is

possible. The main kitchens and ancillary storage areas are located in the basement and a smaller kitchen is located at 32nd floor in the restaurant.

6.2.32 Camden's LDF policies do not protect existing A3/A4/A5 uses and so the loss of the top floor restaurant/bar use itself is considered to be acceptable in principle. Policy DP15 protects existing community facilities, and paragraph 15.7 states that the Council will resist the loss of local pubs that serve a community role (for example by providing space for evening classes, clubs, meetings or performances). This policy is not considered to be applicable to the existing use of the upper floors as a restaurant/bar as the premises is not a pub, does not serve a community role and there are no D1 uses on these floors. Policy DP14 aims to support new tourism development and visitor accommodation in appropriate locations and to protect existing visitor accommodation (hotels, bed and breakfast premises, youth hostels etc). This policy is also not considered to be applicable.

6.2.33 London Plan policy 7.7 is considered to be relevant and this states that tall and large buildings should incorporate publicly accessible areas on the upper floors where appropriate. The applicant has consequently explored whether a publically accessible area to the upper floors of the building can be re-provided and has submitted a 'Public Access Assessment', a Supplementary Paper regarding the Security Approach and an additional viewing gallery option: 'the Southwark Option'. These documents outline the options explored, provide a comparison with other tall buildings, include Market Research carried out, operational considerations, financial viability considerations and security implications and these are summarised below:

6.2.34 Options (which have been explored on the basis of a 360 degree view and location as close to the top of the building as possible being the preferred solution).

- Option 1 & 1A – Gallery to entire floor at 33rd Level
- Options 2 & 2A – Large end galleries to north & south at 32nd level
- Option 3 – Small end gallery to north core at 33rd level
- Option 4 – Gallery to entire floor at 34th level
- Option 5 – Gallery to entire floor at 30th level
- Option 6 – Restaurant to entire floor at 30th level
- Option 7 and 7A – Semi public access at 32nd level ('the Southwark Option')

6.2.35 The operational considerations were that a dedicated, self contained entrance, ground floor space and lift are desirable and are provided in other tall buildings with publically accessible areas (e.g. the Shard and Heron Tower). In order to improve the commercial viability of a viewing gallery facility the ability to include functions and secondary income (e.g. ancillary shop and café) was also desirable. The applicant has stated that there are only two known towers world-wide which are in solely residential use and have public access: the Eureka Skydeck in Melbourne and Skypoint in the Gold Coast, both of which are newly constructed towers with purpose built public galleries and separate entrances, ground floor areas and lifts.

6.2.36 Security

The existing restaurant does not have 'airport style' security and access is controlled with a reception desk at Mezzanine floor level. Airport style security measures are included at most, but not all, existing towers with public access; the

Shard, Tower 42 and 30 St Mary Axe all include airport style security, but Heron Tower does not. The applicant has highlighted that all of these other locations are purpose built towers, with separate dedicated entrances and lifts and are not in solely residential use. They state that as the use of Centre Point will be solely residential and that as it is not possible to provide a completely separate lift or lobby area the security risk and perception of risk would be high and this results in the requirement for airport style security measures.

6.2.37 Dedicated entrance, ground floor level and lift

All options can provide a separate dedicated entrance at ground floor level and require at least 116 and 216sqm of space to accommodate ticket desks/reception and security lanes which are essential for the commercial viability of any public gallery operation. Whilst this space is essentially half of the ground floor area it is considered by the applicant to be insufficient to accommodate the required waiting areas, ancillary shop/café and security required. As a comparison the Shard provides 628sqm, the London Eye 680sqm and the Empire State building 730sqm at reception/ground floor level. It is not possible to provide much more space at ground floor level as space is still required for the residential entrance, lobby area and other lift core. The use of half of the ground floor area will also impact on the access to some of the residential units as 43 units are only accessible via the northern stair core. These residents would need to enter at ground floor level, take the stairs to the mezzanine floor and access the lift core at mezzanine level. Whilst not physically impossible this will have an impact on residential values and consequently on the viability of the scheme as a whole.

6.2.38 It appears possible to provide one dedicated lift to provide access to a viewing gallery in either the northern or southern lift core (depending on the option). This would mean that one lift would be used by both private residents and members of the public using lift key cards, but not at the same time. The applicant has stated that this arrangement would make the residential units would be less marketable and reduce lift capacity. The restaurant option also requires additional servicing and deliveries and an increased use of this or another lift. The existing restaurant has a SMP requiring this servicing to occur 'out of hours' so as not to affect the office use and this would not be possible in a residential building as there are no real appropriate 'out of hours' times.

6.2.39 Commercial viability of operation of a viewing gallery

Britton McGrath Associates have assessed the operational sustainability of each of the options from a visitor attraction perspective to ascertain whether the options would be commercially viable from an operational/business perspective. Market Research was carried out along with an assessment of the site to ascertain the likely demand and this was predicted as ranging from 200,000 (option 3) – 500,000 (option 4) people per year. The capacity of each option was then explored and the maximum throughput capacity of the ground floor area is fixed at 145 people per hour. Each option then has different capacity levels depending on the amount of floorspace of between 132sqm (option 3) to 503sqm (option 5) people per hour. The limitations of the ground floor area will therefore result in only option 3 being able to operate at full capacity. The financial analysis concludes that none of the options are commercially viable for a separate operator as they do not produce a sufficient rate of return.

6.2.40 The restaurant option (option 6) has additional restrictions in terms of the amount of space required for kitchens, lack of space for events and impact on residential units from potential noise, smells and servicing.

6.2.41 Southwark option

This option was included at the request of officers as an alternative to a standard public gallery or restaurant use. In this option 'semi public' would be provided with a viewing gallery accessible to the immediate community and businesses, local schools/further education, tower residents and the landlord/freeholder. This option was explored to see if there was a viable option that could be subsidised by the tower service charge and hourly hire charges, which would not require a similar amount of reception areas and security measures. The conclusion was that a similar amount of ground floor space would still be required, the issues regarding lift sharing, impact on access to residential units and loss of residential floorspace would also all still be relevant.

6.2.42 Impact on scheme viability

The applicant has submitted a Financial Viability Assessment which considers the viability of the proposed scheme together with three alternative scenarios:

1. 50% housing and 50% office floorspace provided on site (with the housing being 100% private)
2. Viewing gallery provided to the upper floors of Centre Point Tower
3. Restaurant provided to the upper floors of Centre Point Tower

6.2.43 Restaurant provided in Centre Point Tower All options result in the physical loss of residential floorspace (between 115 and 432sqm), along with the loss of space at ground floor level (between 116 and 216sqm). The options have been assessed as part of the overall viability of the scheme. The impacts on overall viability include the loss of residential floorspace value, the loss of the ability for 'growth' and the impact on residential values from the shared ground floor area/lifts. The conclusion is that the inclusion of any of the options would make the scheme unviable and would result in a scheme with no affordable housing provision or S106 financial contributions.

6.2.44 **Existing public house use**

Policy DP15 aims to support community facilities and states that the Council will protect existing community facilities by resisting their loss unless a replacement facility that meets the needs of the local population is provided or the specific community facility is no longer required in its current use. The supporting text at paragraph 15.7 states that the Council will resist the loss of local pubs that serve a community role (for example by providing space for evening classes, clubs, meetings or performances) unless alternative provision is available nearby or it can be demonstrated that the premises are no longer economically viable for pub use.

6.2.45 The level of public consultation responses on the loss of the Intrepid Fox public house, with over 2,200 objections, demonstrates that the pub is a well loved facility, both for nearby residents and those further afield, which serves a particular clientele. The objectors do not provide any evidence that the pub is considered to serve a specific 'community role', apart from it being "the only rock pub in Central

London”, being a unique local business, and being a meeting point for those in the ‘alternative’ community.

6.2.46 In line with policy DP15 the applicant has demonstrated that there is alternative provision available nearby (including The Crobar, Manette Street; Garlic and Shots, Frith Street; the Hobgoblin, Kentish Town; and World’s End, Camden Town). Whilst there has been a public house on this part of the site since Centre Point was built The Intrepid Fox has only occupied the building since December 2006, following its relocation from Wardour Street. The short term nature of the tenancy and the fact that the occupant has been able to successfully relocate suggests that the venue is not solely dependent upon being on this site. It is therefore considered that the loss of the Intrepid Fox public house complies with Policy DP15.

6.2.47 Retail/Restaurant/Bar uses

The proposal includes the creation of approx 8,155sqm of retail/restaurant/bar floorspace (A1/3/4) predominantly at ground and basement floor level. Policy CS7 promotes retail growth as part of redevelopment schemes and states that this should be focussed in Camden’s designated growth areas and existing centres. In the Tottenham Court Road growth area policy CS7 states that the redevelopment of existing buildings will enable the provision of new retail, in particular at ground floor level. The policy seeks to provide a range of shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice. The proposed mix of class A1/A3/A4 uses, and creation of 8,155sqm of retail/restaurant/bar floorspace in this location, is therefore considered to be acceptable.

6.2.48 In addition to the above, policy CS7 also sets a plan target of between 27,000 and 31,000sqm of new retail floorspace in the borough by 2026. Whilst it is appreciated that the proposal is for flexible commercial space, the 8,155sqm proposed could make a significant contribution to the borough retail target. It is recognised that a flexible permission, and notwithstanding licensing laws, could allow for the creation of a combination of large scale food and drink premises. Conditions are recommended to ensure that there will not be an over-concentration of food and drink uses and a retail function will present.

6.2.49 The north and western parts of the site are located within a Central London frontage for retail purposes. The proposal is for 8 new commercial units within the frontage, at the lower levels of Centre Point House which would face onto the new public square. The introduction of retail space would allow for activity to these frontages and this is welcomed in terms of the contribution of such uses would have to the square and the wider ‘place’ objectives.

6.2.50 Policy DP10 encourages the provision of small shop premises suitable for small and independent businesses. The policy expects the provision of small units (i.e. less than 100sqm) for schemes of 5,000sqm of retail or more. Two of the proposed retail units (R7 and R8) are 31sqm and 10sqm respectively and therefore meet the policy requirement.

6.2.51 Policy CS7, along with policy DP13, state that the Council will ensure that

development in its centres is appropriate to the character, size and role of the centre in which it is located and does not cause harm to neighbours, the local area or other centres (the impact of food, drink and entertainment uses on the surrounding community and local environment is a particular issues, see paragraph 6.5.10 for discussion on this matter)

6.3 **Demolition / listed building / design**

The amended scheme is the same as the previous scheme in terms of the works to Centre Point Tower and Centre Point House, except that the ground floor extension underneath the bridge link is not included and a new building is proposed at the Intrepid Fox public house part of the site. Paragraphs 6.3.19 to 6.3.37 below are therefore replicated from the previous committee report. With regard to paragraph 6.3.37 it is understood that the applicant is in discussions with the Twentieth Century Society (who have raised an objection on the loss of the original façade) with regards to a new façade design which would be much closer to the existing and this will be reported in the supplementary agenda.

Impact on significance of the buildings

- 6.3.1 The impact of the proposal needs to be balanced against securing the optimum viable use of the building and the public benefit the scheme brings. Section 12 of the NPPF covers the historic environment and defines listed buildings and conservation areas as “designated heritage assets”. Paragraph 132 of the NPPF gives great weight to the conservation of a heritage asset’s significance. The case for proportionality is outlined in terms of the greater the importance of the asset then the greater this weight should be to its conservation. Paragraph 133 advises that where a proposal would lead to substantial harm or total loss of significance to a designated heritage asset then consent should be refused unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh the harm. Paragraph 134 advises that where a proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 6.3.2 To help interpret NPPF guidance the PPS5 Practice Guide is still relevant. In paragraph 89 of this document the issue of optimum viable use is considered. Viable uses fund future maintenance of buildings and ensure the future conservation of an asset. The optimum viable use is defined as one “which causes the least harm to the significance of the asset, not just through necessary initial changes but also as a result of subsequent wear and tear and likely future changes”. It is acknowledged that some of the proposals to the building do cause ‘less than substantial harm to the building’s significance’ however, it has been demonstrated that as office space the building is obsolete for modern uses and cannot continue in this use. Without a viable use for the building it would become empty and deteriorate in condition. Options such as a mixed office and residential use have been tested and still been found to be unviable. The use of the building for residential use, with a new affordable housing block to maximise the provision of affordable housing on the site, would therefore bring forward welcomed repairs and improvements to the building and provide funding for the significant improvement to the public realm around the site. This view is shared by English Heritage in their letter commenting on the application. A detailed assessment of the proposal

provided in the following sections);

6.3.3 **Intrepid Fox**

It is proposed to provide a new ten storey block (eleven including the basement) on the site of the Intrepid Fox which would maximise the affordable housing provision of the scheme.

6.3.4 ***Demolition***

The existing Intrepid Fox building is located at the southern end of Centre Point House. Although it appears to be an integral part of the Centre Point House it is in fact a separate structure with a visible structural joint and different construction method compared with Centre Point House. Early designs for Centre Point House envisaged a pub on the site to the same size as was built, however Centre Point House itself was originally designed as a distinctly separate element with a much different bulk and massing. Changes to the design of the whole Centre Point development in the 1960s resulted in the loss of floorspace from the tower (necessitated for LCC requirements for a wider roadway) and this lost space was added to Centre Point House. It was only with the resultant redesign of Centre Point House that the pub building was loosely designed to tie in. In the past alterations to its façade such as the erection of the conservatory to the front elevation have somewhat diminished the appearance of this part of the building.

6.3.5 The main issue for consideration with regard to the demolition is the impact that the substantial demolition of the building would have on the significance of the designated and undesignated heritage assets having regard for the overall merits of the scheme.

6.3.6 It is considered that the pub is of some interest in terminating the southern façade of the Centre Point House podium; however this is the least significance part of Centre Point and was not intended to be an integral feature of Centre Point House. Therefore it is the most suitable part of the site where additional accommodation could be provided. A new building could still terminate the façade of Centre Point House and replicate the role that the Intrepid Fox building plays in the overall composition of Centre Point.

6.3.7 ***Loss of existing use***

Whilst the Intrepid Fox is a popular venue it has only been located in the current building since 2006, previously it was located in Wardour Street in Westminster. Assessed against English Heritage's "Conservation Principles", there is no evidential, historical or aesthetic value between the Intrepid Fox public house use and the building itself. The communal value of the Intrepid Fox is not dependent on a location in Centre Point and could be provided in another venue.

6.3.8 ***New Affordable Housing Block***

The proposed new block offers the option of maximising the provision of affordable housing on site whilst minimising the harm to the building and results in the optimum viable use for the site.

Relationship with Centre Point

6.3.9 The proposed block is designed to respond generally to Centre Point House

without replicating every detail. Centre Point itself consists of three elements of the tower, glazed link bridge and Centre Point House. Although these appear distinct in appearance and form, parts of the design of each element provide a consistent link such as: the strong robust forms, the use of ceramic tiles and expressed concrete which all give a unity to the composition. All these components are used in the proposed block.

- 6.3.10 The new building is clearly modern and does not attempt to match the appearance of Centre Point House. This approach is considered acceptable as due to the constraints of the site is not possible to design a rectilinear building to closely resemble Centre Point House.

Height bulk and massing

- 6.3.11 The site is particularly challenging given the listed status of the building, conservation area location and proximity of neighbouring listed buildings. The footprint of the building is dictated by the tapering nature of the site at the southern end of Centre Point House. Various massing options have been investigated with the proposed tapered form offering the best balance between maximising the provision of affordable housing whilst maintaining a robust and simple appearance. A rectilinear form would have provided much less affordable housing floorspace.
- 6.3.12 The overall massing respects Centre Point House with the lower levels tying in with the podium of this building. In terms of the height the new block and Centre Point House could never match as the existing floor-to-ceiling heights would not comply with modern insulation standards and because Centre Point House contains a small void floor between the podium and the upper floors. If the floor-to-ceiling heights did match then internally they would only be 2020mm in order to accommodate ventilation, servicing etc in the ceiling voids. Given this situation a slight increase in height in relation to Centre Point House is justifiable.
- 6.3.13 The proposed block at upper levels projects slightly further into Earnshaw Street than the existing façade of the upper floors of Centre Point House. The difference in the respective building lines is small and this transition is addressed by angling back the façade to meet Centre Point House in a comfortable manner.

Detailed design

- 6.3.14 Key features of Centre Point House have been picked up in the design to provide cohesion with the rest of the Centre Point Complex. It is unfortunate that the glazed stairwell on the south side of Centre Point House is covered by the proposed building in views from the south. However in views from the west the glazed stairwell is still visible with a shadow gap created between it and the new build to better reveal its form.
- 6.3.15 The existing glazed stairwell also provides articulation to the south elevation of Centre Point House. In the new building the design introduces vertically stacked recessed balcony to provide this interest and activate the corner. The balconies have been carefully designed with a clear reference to the existing balconies on Centre Point House through the use of alternating concrete or timber and glazed balustrades. At ground floor level the shopfront provides an active frontage with the podium element lining through with Centre Point.

Materials

6.3.16 A range of concrete (from a marble terrazzo finish on the tower to a fair faced finish to the link bridge and Centre Point House) is used throughout Centre Point. Additionally the end elevations of Centre Point House are also clad in fine trapezoid mosaic tiles and tiles are also used to clad the piloti. In keeping with this material palette the new affordable housing block would be clad in fair faced concrete at the lower levels and that the upper levels would be clad in pre cast concrete tiles. The tiles would be embellished with a pattern which is considered appropriate as there are very few areas on unrelieved external concrete found in the Centre Point complex. Concrete on the tower and Centre Point House is applied in a grid-like arrangement and the proposed pattern of the concrete tiles is a modern interpretation of this. The precise details of the pattern would be agreed by condition and the details submitted with the application are for illustration only.

6.3.17 *Setting of St Giles Church*

Views of the Grade I listed Church of St Giles-in-the Fields are possible from Earnshaw street. There are existing restricted views of only the spire and steeple and these would be blocked by the new affordable housing block, but these restricted views are considered to be of less significance. The most significant views are from the junction of Earnshaw Street and Bucknall Street where the spire of the church is visible in conjunction with the whole church and these views would be uninterrupted.

6.3.18 Although the proposed development would bring the southern building line closer to the church it is noted that the site is within a central London location where there is a diversity of building ages, heights and styles ringing the church. The front building line would be no closer to the church than the adjacent Central St Giles Scheme which is also much taller. In this context it is considered that the setting of the listed church is preserved.

6.3.19 *Centre Point Tower* ***Ground floor works***

These consist of relocating the existing external steps within the building to provide access to the mezzanine level. Originally the ground floor level below the tower was open and there was a ramp in this position to access the basement car park. Pedestrian access to the tower was via both of the external stairs to a reception area at mezzanine level. The ground floor has been subsequently enclosed in 2001 with pedestrian access now at ground floor level partly rendering the existing external stairs redundant.

6.3.20 The external steps form an important element of the building and provide evidential value of the fact that access to the building was original accessed from the mezzanine level. The relocation of the stairs does cause harm to the special interest of the listed building, however this harm would not be substantial and under the guidance of paragraph 134 of the NPPF “less than substantial harm” needs to be weighed against the public benefits of the proposal.

6.3.21 In this case the scheme needs to be assessed against the emerging context around the site. Immediately to the west will be the entrance to the Crossrail

station which is currently under construction. As part of these works there is already approval to relocate the existing western staircase closer to Centre Point (ref: 2009/4440/L). Given the position of the new station entrance the existing stair would create a narrow “pinch point” at the base of the building which would not be inviting to pedestrians.

6.3.22 On the eastern side it is also proposed to relocate the stairs internally as this will create a cleaner and much more attractive ground floor façade onto either the existing pavement or any future new public square. For both staircases there is a demonstrable public benefit to the works.

6.3.23 By relocating both stairs inside the building they would become the primary means of accessing the mezzanine level again (it is also the intention that the stairs would be reused so minimal fabric would be lost). As part of this scheme the proposals seek to open up the ground floor to better reveal this space. The external paving will be carried through at ground floor level to create the impression that this space was once external. Additionally full height glazing would allow views through the ground floor which would again reinforce the impression that this space was once open.

6.3.24 Through a combination of the public benefit and the reuse of the stairs as the main access point to the mezzanine (their original role) this element of the proposal is acceptable.

6.3.25 ***Partitioning associated with residential conversion***

The interior of the building has been inspected and there are few features of interest to be found. As this space was designed for a flexible office layout, each floor was built as one large space with service cores (stairs and lifts) at either end. Any partitioning was seen as an insertion which could be altered as and when required. An inspection of the floor and ceiling structure revealed a simple reinforced concrete construction which is aesthetically unremarkable and not designed to be exposed. The sub-division of these spaces is in character with the original intention of this area being flexible in its use. Partitions have been carefully detailed so as to abut against the mullions of the windows rather than bisecting the opening.

6.3.26 ***Replacement windows***

It is proposed to replace all of the windows in the building largely like-for-like with double glazed units. The current windows are unremarkable and whilst they have clearly been constructed for the building they are a standard design from the time and are not particularly innovative

6.3.27 Centre Point Tower is an iconic building which is visible from long distances around London. However the windows play a secondary role in the composition of the tower façade with the concrete framing being dominant. From a distance the appearance of the finer detailing of the windows is lost with only the contrast between the solid (of the concrete) and void (of the windows) being apparent. Although the spandrels below the windows would be replaced with glazing the overall configuration of the framing would remain almost identical and it would not appreciably alter the appearance of the building.

6.3.28 **34th floor**

Presently this level is used for services. It would be converted to a residential level and this would include the replacement of the louvers with full height glazed screens. These screens would be tinted to limit light spill and give a visual priority to the 'Centre Point' lettering at this level.

6.3.29 The Centre Point lettering is to be replaced to match the existing. Whilst the lettering is not original to the building it has become a recognised feature. There is no issue with the loss of historic fabric so this proposal is acceptable. A condition is recommended requiring the submission of the details of the lettering to be submitted.

6.3.30 **Centre Point House**

A bar occupies the corner of Earnshaw Street and New Oxford Street. This is a self contained unit within Centre Point House which retains a number of original features such as tiling and stairs. These are to be retained although the façade would be replaced. Whilst this will result in the loss of a section of original glazing it does mean that a consistent ground floor frontage can be achieved. The existing glazed screens are not a particularly innovative design (in comparison to say the full height glazing on the link bridge) and its loss is considered acceptable in this instance where there are benefits which outweigh the harm.

6.3.31 **Top floor of link bridge**

The top floor of the bridge is currently cellular office space and the proposal involves opening this space up. The partitioning is not of historic interest and its removal would open up the area to create a new, more usable area. The glazing would be replaced from the existing standard design to a higher quality frameless system.

6.3.32 **Removal of internal floors**

Within Centre Point House two floor slabs would be removed to create double height spaces at ground floor level behind the brise soleil. Externally this will have no impact on the appearance of the building. Internally the spaces are not of interest and whilst fabric is lost this is only plain twentieth century concrete.

6.3.33 **New pedestrian route**

Part of the consideration of the scheme is the public benefit created by the proposed route through Centre Point House. This would be in conjunction with the creation of public open space on Sutton Row in Westminster and create a welcoming legible route from Soho Square, through Centre Point and the proposed square, along Bucknall Street through to the east and Bloomsbury. Essentially the structure of the building is retained with only internal partitioning and non-original shopfronts lost. The significant public benefit outweighs any limited harm in terms of the loss of a small amount of historic fabric.

6.3.34 **Shopfronts**

The existing shopfronts at ground floor level are an assortment of modern replacements with little overall cohesion. In their place would be inserted high quality, minimal framed glazed which would introduce a more uniform and attractive

ground floor frontage.

6.3.35 ***Brise soleil***

On both the east and west elevations of Centre Point House there is a brise soleil which forms a distinctive pattern to both of the facades. A strongly defined concrete lattice frame features alternating recessed metal spandrel panels. Early designs for the building indicate that there would have been no spandrel panels and early photos suggest that the panels were painted a darker colour to reduce their impact. Their removal is considered acceptable as it does not appear that they were intended to be an integral feature of the building.

6.3.36 ***Residential façade***

The cladding to the upper floors is to be replaced. As existing this consists of cladding panels and windows. The panels themselves are not in themselves remarkable and being only 50 years old do not have the same value as fabric from much earlier listed buildings. Modern cladding materials such of these do not have the same life span as others such as brickwork or stone and are designed to be replaced eventually rather than being maintained continuously. Whilst the new cladding would not exactly replicate the existing its differences would be minimal and those features lost (such as the framing) are not integral to the building's design, rather they were necessary at the time due to the technology available then. Details such as the hardwood rails will be reinstated.

6.3.37 ***Service ducts***

As part of the original application vertical ducts were to be placed at each end of the building and this has now been removed from the proposal. Any kitchen extracts will be routed internally and vented at roof level on the new build block. A condition is proposed requiring further details to be submitted.

6.4 **Transport implications**

6.4.1 The site has a PTAL score of 6b, the highest achievable, which indicates that it has an excellent level of accessibility by public transport. The nearest station is Tottenham Court Road, with Holborn, Goodge Street, Oxford Circus and Leicester Square all within walking distance. The accessibility of the site will be further increased following the introduction of Crossrail services at Tottenham Court Road in 2018. The nearest bus stops for the many bus routes are located on St Giles High Street (outside St Giles in the Fields Church), on New Oxford Street, on Charing Cross Road and on Tottenham Court Road. There are a number of bus stands and stops adjacent to or within the site as follows:

- Two stands are located on the western side of Earnshaw Street for route 1
- Two stands are located on the western side of St Giles High Street for route 134, N35, N68 and N253
- Two stands are located on the eastern side of St Giles High Street for route 242; and
- Two stands are located on southern end of St Giles High Street for route 176.
- One bus stop is located on St Giles High Street for routes 24, 29, 234, 176 and 242.

The site is within a controlled parking zone which operates between 8.30am to 6.30pm Monday to Saturday and suffers from parking stress. The London Borough of Camden is the highway authority for all roads in the area. The A40 (Oxford

Street, New Oxford Street and St Giles High Street) and the A400 (Charing Cross Road and Tottenham Court Road) form part of the Strategic Road Network; although the London Borough of Camden is the highway authority for these roads, TfL has a network management duty which requires their approval where any proposals are likely to have an impact on traffic movements.

- 6.4.2 The proposal includes changes to the existing vehicular access ramp on Earnshaw Street which would be replaced with two car lifts and a servicing area. The existing basement car park will be used for the location of plant, cycle parking and some car parking (with a reduction of spaces from 70 to 18). The changes to the servicing arrangements on Earnshaw Street and the construction arrangements on St Giles High Street would involve the consequent relocation of bus stands and stops as follows:

Earnshaw Street – permanent changes

- Bus route 1 currently terminates on Earnshaw Street and there is a bus stand on the west side of the street with capacity for 2 buses. This stand would need to be relocated southwards towards the junction with Denmark Street.
- TfL have requested that an area is safeguarded on Earnshaw Street for 1 bus stand with capacity for 1 bus. Space has been left to the north of the existing bus stands towards the junction with New Oxford Street, to accommodate this in the future if required.

St Giles High Street – temporary changes during construction

- Bus routes 134, 242, N35, N68 and N253 currently travel through the site on St Giles High Street. There is an existing bus stand on the east side of the street for bus route 242 and one on the west side of the street for bus route 134, N35, N68 and N253 both with capacity for 2 buses. The road alignment is proposed to change during construction and therefore the location of these bus stands will change accordingly. The bus routes and bus stand capacity will not change.

6.4.3 **Road closure and provision of public realm**

A feasibility study is underway to restore two-way working on Tottenham Court Road, and as part of this study the opportunities to create pedestrian routes and public areas by closing or redesigning sections of streets is to be explored. The St Giles to Holborn Place Plan (approved November 2012) sets out a vision for the area and envisages ‘an area where the opportunities to create new distinctive public spaces are seized’. The provision of new public realm at St Giles Circus is identified in the LDF draft Site Allocations document (modified submission March 2013) along with the potential to reconsider bus movements and stands and, where appropriate and feasible, to remove road traffic through road closures. The full scope of the St Giles Circus proposals is dependant on implementing the wider Tottenham Court Road 2 way project, which is looking at making Tottenham Court Road and Gower Street two way and funding has been secured from TfL for further analysis of these works including the closure of the northern end of St Giles High Street.

- 6.4.4 It should be noted that the Sites Allocation documents is not yet adopted Council Policy. The Site Allocations DPD has been through four stages of consultation prior to an Examination in Public which took place in January. Following a further round of consultation arising from the Examination the Inspector’s Report is expected imminently. Subject to this, adoption is expected in September.

6.4.5 Paragraph 216 of the NPPF clarifies the Local Authorities weighting given to emerging policy documents. From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given);
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

The site allocation document is therefore material considerations in the assessment of any planning applications.

6.4.6 The applicant previously proposed the closure of the northern end of St Giles High Street and provision of a new public square as part of the previous planning application. This has been removed from the planning application to allow the impacts of the closure of St Giles High Street on the surrounding road network to be fully understood and assessed by the Council and Transport for London, and to allow comprehensive public consultation. The Council remain committed to delivering the scheme as part of the West End Project and the contribution expected for this development towards the future provision of a new public square would be £3.17million and this will be secured with a S106 legal agreement.

6.4.7 The northern end of St Giles High Street is largely in the ownership of the applicant and, should the new public square be implemented, a Management Strategy would be required. This should include details on public access and the management of the new square, including cleaning, repairs, provision of tables and chairs along with the coordination of this management between the various landowners. This Management Strategy will be secured with a S106 legal agreement.

6.4.8 The Tottenham Court Road two way working scheme forms part of the West End project and is linked to the provision of a new public square at the northern end of St Giles High Street. It is currently understood that the provision of a new square will only be possible if the Tottenham Court Road two way scheme is implemented. The contribution expected for this development towards the Tottenham Court Road two way working scheme would be £1million and this will be secured with a S106 legal agreement.

6.4.9 **Pedestrian routes**

Policy DP16 seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. Policy DP17 seeks to promote walking, cycling and public transport use. Policy DP21 seeks to avoid causing harm to highway safety or hinder pedestrian movement. Policy DP17 seeks to promote walking, cycling and public transport use. A new east-west pedestrian route is proposed underneath Centre Point House linking the proposed new public square in the west with Earnshaw Street and providing a new link from Soho in the west to Princes Circus in the east. Provision of this route is welcomed and in line with policy and the objectives of the St Giles to Holborn Place Plan.

6.4.10 In order to facilitate this east/west pedestrian route and the proposed off street servicing arrangements on Earnshaw Street the proposal requires the relocation of existing bus stand locations on Earnshaw Street. A small kerb build-out would be required in order to provide sufficient inter-visibility between pedestrians using the east/west pedestrian route and vehicular traffic using Earnshaw Street. Relocating the bus stands to the southern end of Earnshaw Street would require the removal of some pay and display parking bays on the other side of the road. The Council would aim to relocate these parking bays to a nearby location as part of the highway improvement works associated with the site. These proposals for are considered acceptable in principle and are not considered to be detrimental to the operation of the road network in the vicinity of the site. They are to be secured with a S106 legal agreement and conditions.

6.4.11 The proposed highway works described above would need to be implemented by Camden's Engineering Service prior to any works commencing on site if planning permission is granted. The applicant would be required to provide Camden with detailed designs of the proposed temporary road layout for St Giles High Street and the proposed permanent alterations for Earnshaw Street. The applicant would need to arrange for TfL to relocate the set of traffic signals at the northern end of the proposed temporary road layout. The applicant would also need to secure written approval from TfL to relocate the bus stands on Earnshaw Street. This should be covered by a Section 106 agreement if planning permission is to be granted.

6.4.12 **Parking**

There are 2 basement levels beneath the entire site which currently provide car parking, servicing and refuse areas and ancillary kitchen and storage areas for the upper floors. These basement levels were originally constructed with vehicular access from Charing Cross road and the provision of 140 car parking spaces. As the building has been remodelled over the years it now provides vehicular access from Earnshaw Street and 70 marked out car parking spaces for the commercial floorspace (55 of which are regularly in use and there is space in the basements for 105 space). The proposal is for 18 car parking spaces (17 for the residential units and 1 for operational use). All of the spaces would be fully accessible by disabled drivers while also having access to an electric vehicle charging point (10 to be provided). The proposal also includes the re-provision of 4 existing motorcycle parking spaces.

6.4.13 In line with Policy DP18 the Council will expect development to be car free in the Central London Area, areas within Controlled Parking Zones and sites which are highly accessible by public transport. Given the site's location within Central London, adjacent to Tottenham Court Road Station and various bus routes and within a CPZ the scheme would be expected to be car free (which includes no motorcycle parking spaces). The previous application provided 36 car parking spaces within the basement and one of the reasons for refusal for the previous application was:

"The provision of car parking spaces in the proposed development and in the absence of a legal agreement to secure car-free housing units and commercial floorspace, would fail to promote more sustainable and efficient

forms of transport, contrary to policy CS11 (Promoting sustainable and efficient travel) of the London Borough of Camden Local Development Framework Core Strategy; and policies DP17 (Walking, cycling and public transport), DP18 (Parking standards and limiting the availability of car parking) and DP19 (Managing the impact of parking) of the London Borough of Camden Local Development Framework Development Policies; and policies 6.11, 6.12 and 6.13 of the London Plan July 2011.”

6.4.14 The applicant has consequently reduced the parking numbers down to 18 and 4 motorcycle parking spaces and has provided further justification as to why they have provided these parking spaces on site as follows:

- They have maximised the use of the car park with plant, ancillary retail space and ancillary residential space in the basement areas directly below the tower and Centre Point House.
- The applicant has explored alternative uses to car parking that could be accommodated in the central basement area (gym/spa, retail, bar/nightclub and bicycle shop) and has concluded that this is not possible for the following reasons:
 - A fire escape route must be maintained between both fire escape stairs within the tower and Centre Point House through the basement under the bridge link building. A route or corridor would therefore need to be provided through the basement as a fire escape route.
 - The servicing access to the tower and Centre Point House is via Earnshaw down to the basement areas. Any refuse from the tower must be wheeled across the basement to Earnshaw Street and any servicing access is via Earnshaw Street and the basement. A route or corridor would therefore need to be provided through the basement for refuse and servicing.
 - The central basement area has the most restricted head heights due to the presence of structural beams. The structure of the building at basement level means that little changes can be made to accommodate alternative uses (e.g. with the creation of a double height space).
 - The restricted head height in the basement makes it difficult to provide mechanical ventilation. The retention of the central basement area as a single volume allows the natural circulation of air. If the space was subdivided there is insufficient headroom to allow ducts to be carried at ceiling or floor level.

6.4.15 The applicant is willing to ‘car cap’ the proposed parking to 18 spaces, with any residential unit or commercial tenant that does not have access to these spaces being unable to apply for an on street parking permit. It is considered that the applicant has fully explored the use of the basement for alternative uses to car parking and has minimised the amount of car parking to be provided on site. The proposed provision of 18 on site car parking spaces and 4 on site motorcycle parking spaces is therefore considered to be acceptable and a car capping of the scheme will be secured in a S106 agreement.

6.4.16 Servicing

A draft Servicing Management Plan (SMP) has been submitted which states that the existing servicing takes place via the ramp access from Earnshaw Street either at basement level or directly from the ramp and refuse collection takes place on

street from Earnshaw Street. There are a total of 123 vehicular trips per day at the site. The proposal is for the relocation of this servicing access further north along Earnshaw Street by a few metres (away from the existing residential entrance at Matilda Apartments) with the provision of a new ground floor loading bay area and a total of 106 trips per day. These proposed servicing arrangements are considered acceptable and will be secured with the submission of a Servicing Management Plan in a S106 agreement.

6.4.17 Construction

The adjacent Crossrail/LUL works adjacent to the site at Tottenham Court Road station are due for completion in 2016 and the current programme at the application site is for work to commence in early 2013 and finish in 2016. Given the overall scale of development, the Central London location and proximity of other construction projects information has been submitted in various documents assessing how the proposed works would be programmed and managed during the construction period. The previous application proposed the closure of St Giles High Street to create a works site and facilitate construction, this has consequently been amended to include the realignment of this part of St Giles High Street and the use of the land to the east of the realigned road as a works site. This would allow buses and servicing vehicles to access this part of St Giles High Street during the works. The existing bus stands and the loading bay on the west side of the road would continue to operate as per the existing arrangements and would not need to be relocated to surrounding roads. The applicant has undertaken a traffic modelling exercise which shows that the proposed temporary road layout would actually provide modest improvements to traffic flows in terms of journey times and queue lengths. It is therefore considered that the proposed temporary road layout would not be detrimental to the operation of the road network in the vicinity of the site.

6.4.18 Given the amount of construction planned or taking place in the area it is critical that these construction works minimise the impact on the Tottenham Court Road Station upgrade project and minimise the cumulative impact on the area. Any Construction Management Plan should therefore include a high level of community liaison and membership of the 'St Giles Circus Projects Working Group'. These proposed construction management arrangements are considered acceptable and will be secured with the submission of a Construction Management Plan in a S106 agreement. TfL raised a number of specific concerns regarding construction management and the impact on the adjacent Tottenham Court Road station works. It is therefore proposed that the final CMP will undergo consultation with TfL to ensure that these issues are rectified.

6.4.19 Trip generation

There is an overall reduction in trips to and from the site (138 two way trips) with a change in the timings for the peaks; because of the change in the overall nature of occupants in the building the existing peaks occurs into the site in the morning and away from the site in the evening and this will be reversed.

6.4.20 Cyclists

Policy DP17 and the London Plan require development to sufficiently provide for the needs of cyclists, which includes cycle parking and states development must

comply with Camden Parking standards which states that one storage or parking space is required per residential unit, however for larger residential units (3+ beds) two spaces are required. Therefore 126 spaces are required for the residential use (113 spaces for the tower units and 13 for the affordable units). In relation to the commercial elements one space is required per 250sqm over 500sqm with a further requirement for visitor spaces. Therefore 33 cycle spaces are required for the commercial staff and 33 spaces are required for customers.

- 6.4.21 The applicant has amended the scheme to provide included provision for 169 cycle parking spaces for the residential units and 33 spaces for the commercial staff within the basement areas. A further 33 spaces for commercial customers are proposed for the commercial unit customers within the public realm (location not identified). The provision of these spaces will be secured with conditions requiring the submission of further details and for all cycle parking on site to be provided prior to occupation of the development.

6.4.22 **Travel Plans**

In order to satisfy the aims of policy DP16 (The transport Implications of development) a Work Place Travel Plan and a Residential Travel Plan is to be secured with a S106 legal agreement. As part of the secured Travel Plan monitoring process the Council would secure the result of a TRAVL after-study on completion of the development which would enable TfL to update the TRAVL database with the trip generation results for the various use categories associated with this development.

6.5 **Amenity impacts**

- 6.5.1 The closest residential units to the site are to the east on Earnshaw Street at Matilda Apartments (in the St Giles Central development) and to the south at York and Clifton Mansions on St Giles High Street. There are habitable room windows at Matilda Apartments facing the Earnshaw Street elevation of Centre Point House approximately 16-19m away and at York and Clifton Mansions angled away from the St Giles Street elevation of Centre Point House approximately 13-17m away at the closest point.

6.5.2 **Daylight/sunlight**

A daylight/sunlight assessment has been provided to analyse the impact on neighbouring residential properties and it shows that the scheme would not detrimentally affect daylight and sunlight reaching habitable rooms in accordance with BRE recommendations. This study has been amended as the application has progressed with additional properties included at 54-58 St Giles High Street and additional information being submitted with regard to the impact on Matilda Apartments. The report concludes the following:

1-53 Matilda Apartments (4 Earnshaw Street)

Daylight

- The Vertical Sky Component (VSC) test is not met at 52 of the 153 rooms tested – the test states that diffuse daylight may be adversely affected if after the development the VSC is both less than 27% and less than 0.8 times its former value. The results show that 19 of these rooms have a ‘minor adverse’ impact, 29 have a ‘moderate adverse’ impact and 4 have a ‘major adverse’ impact.

- In line with the BRE guidance the No Sky Line test would need to be carried out if the VSC test is not met. This states that daylight may be adversely affected if after the development the area of the working plane in a room which can receive direct sunlight is reduced to less than 0.8 times its former value. Of the 52 rooms which did not meet the VSC test, the No Sky Line test is met in 29 rooms. There are therefore 23 rooms that do not meet the VSC or No Sky Line test. Of these 23 rooms 8 have a 'minor adverse' impact, 9 have a 'moderate adverse' impact and 6 have a 'major adverse' impact.
- In line with the BRE guidance the Average Daylight Factor Test (ADF) would need to be carried out if the VSC and No Sky Line tests are not met. All of the 23 rooms which did not meet the first two tests achieve the ADF score of 1% for a bedroom, 1.5% for a living room and 2% for a kitchen.

Sunlight

- Of the 398 windows tested 339 met the Annual Probable Sunlight Hours (APSH) test. The test states that sunlight availability may be adversely affected if the centre of the window receives less than 25% of annual probable sunlight hours or less than 5% of winter sun and receives less than 0.8 times its former value during either period and has a reduction over the whole year of greater than 4%.
- Of the 59 windows that did not meet the test 42 serve bedrooms and the BRE guidance states that "kitchens and bedrooms are less important". Of the remaining 17 windows, 1 has a 'minor adverse' impact and is only marginally below the target. 12 windows have a 'moderate adverse' impact and 4 have a 'major adverse' impact.
- These windows are within units which experience low levels of existing sunlight and some are dual aspect with rooms facing both Earnshaw Street and the courtyard to the rear. It is therefore considered that there will not be a significant impact on the standard of accommodation to the residents in these units.

Vestry 1-5 Flitcroft Street

Daylight

- There are no impacts in terms of daylight at this property.

Sunlight

- There are no impacts in terms of Annual Probable Sunlight Hours (APSH) at this property.

1-3 Denmark Street

Daylight

- There are no impacts in terms of daylight at this property.

Sunlight

- There are no impacts in terms of Annual Probable Sunlight Hours (APSH) at this property.

28 Denmark Street

Daylight

- The Vertical Sky Component (VSC) test is not met at 5 of the 6 rooms tested – the test states that diffuse daylight may be adversely affected if after the development the VSC is both less than 27% and less than 0.8 times its former value. The results show that there is a 'moderate adverse' impact on these 5 rooms.
- In line with the BRE guidance the No Sky Line test would need to be carried out

if the VSC test is not met. This states that daylight may be adversely affected if after the development the area of the working plane in a room which can receive direct sunlight is reduced to less than 0.8 times its former value. Of the 5 rooms which did not meet the VSC test, the No Sky Line test is met.

Sunlight

- There are no impacts in terms of Annual Probable Sunlight Hours (APSH) at this property.

59 St Giles High Street

Daylight

- The Vertical Sky Component (VSC) test is not met the 4 rooms tested – the test states that diffuse daylight may be adversely affected if after the development the VSC is both less than 27% and less than 0.8 times its former value. The results show that 3 of these rooms have a ‘minor adverse’ impact, and 1 has a ‘major adverse’ impact.
- In line with the BRE guidance the No Sky Line test would need to be carried out if the VSC test is not met. This states that daylight may be adversely affected if after the development the area of the working plane in a room which can receive direct sunlight is reduced to less than 0.8 times its former value. Of the 4 rooms which did not meet the VSC test, the No Sky Line test is met.

Sunlight

- There are no impacts in terms of Annual Probable Sunlight Hours (APSH) at this property.

52-58 St Giles High Street

Daylight

- The Vertical Sky Component (VSC) test is not met at 4 of the 74 rooms tested – the test states that diffuse daylight may be adversely affected if after the development the VSC is both less than 27% and less than 0.8 times its former value.
- In line with the BRE guidance the No Sky Line test would need to be carried out if the VSC test is not met. This states that daylight may be adversely affected if after the development the area of the working plane in a room which can receive direct sunlight is reduced to less than 0.8 times its former value. Of the 4 rooms which did not meet the VSC test, the No Sky Line test is met in 3 rooms.
- For the remaining window, there is a ‘minor adverse’ impact and it is only marginally below the targets for the VSC and No Sky Line tests. It is therefore considered that there will not be a significant impact on the standard of accommodation to the residents in this unit.

Sunlight

- There are no impacts in terms of Annual Probable Sunlight Hours (APSH) at this property.

St Giles Churchyard

- The impact on the churchyard to the south of the Intrepid Fox part of the site has been tested to see if at least 50% of the area receives at least two hours of sunlight on 21 March. The results show that 80% of the area would receive at least two hours of sunlight.

Open space to Earnshaw St linked to Castlewood House

- The impact on this private amenity space to the east of Centre Point House has

been tested to see if at least 50% of the area receives at least two hours of sunlight on 21 March. The results show that 0% of this area currently achieves this target and this is unaltered by the development.

6.5.3 **Overlooking**

In terms of privacy there are not considered to be any significant issues for the following reasons:

- There are existing residential habitable room windows to the east of the Intrepid Fox part of the site on the opposite side of Earnshaw Street, at Matilda apartments. The proposal results in two or three habitable room windows per floor facing Matilda apartments. At the 3rd – 9th floors these are 19m away from the existing residents. At the 1st – 2nd floors one of the windows on each floor is 18m away and the other window is 16m away (two windows in total). Given the fact that the new building is on the opposite side of the street to the existing building that there will not be any unacceptable levels of overlooking.
- There are existing residential windows to York and Clifton Mansions to the south west of the Intrepid Fox part of the site on site on St Giles High Street. The proposal results in one or three habitable room windows per floor facing York and Clifton Mansions between 13-17m away from the proposed building. Given the fact that the new building is on the opposite side of the street to this existing building and that most of the existing building is angled away from the new windows it is considered that there will not be any unacceptable levels of overlooking.
- At Centre Point House there are no changes proposed to the residential accommodation in terms of use or location of windows. The lower floors of the building are already in a mixture of office, retail and restaurant use and the proposed changes to the uses at these levels along with changes to the size of units are not considered to have any overlooking impacts on existing residential units.
- The proposed residential units in the Tower would be approximately 35m away from the existing residential units in Centre Point House and approximately 40m from the new office developments on Charing Cross Road. There are therefore not considered to be any overlooking issues from the proposed new residential units or the ancillary uses such as the pool and gym.

6.5.4 **A3/4/5 Uses**

Paragraphs 6.2.47- 6.2.51 discusses the land use assessment for new A1/3/4 uses on site. In terms of licensing and the impact on residential, the site is within the Seven Dials Special Policy Area in the Camden's Statement of Licensing Policy (2011). This is one of two areas in the borough where the number, type and density of premises selling alcohol for consumption on the premises is having a serious negative impact on the local community and local amenities. This area therefore has special licensing policies that apply.

- 6.5.5 In summary this policy applies when assessing any applications for new Premises Licences and Club Premises Certificates, applications to increase the capacity of licensed premises, applications to extend the hours during which licensable activities may take place in existing licensed premises, applications for Provisional Statements or variations that may otherwise have a negative impact on cumulative impact in the area (such as the addition of licensable activities that may change the

character of the premises). Where representations are received for these applications, in almost all cases the applications will be refused.

- 6.5.6 The only exceptions to this policy are for small premises with a capacity of fifty persons or less who intend to operate during framework hours (Alcohol licenses = Monday to Thursday 10am to 11.30pm, Friday and Saturday 10am to midnight, Sunday 11am to 10.30pm. Other licenses = as before but 9am start every day), premises which are not alcohol led and operate only within framework hours or instances where the applicant has recently surrendered a licence for another premises of a similar size, providing similar licensable activities in the same Special Policy Area.
- 6.5.7 The applicant has applied for the flexible use of the commercial floorspace in Centre Point House and the bridge link for either A1 (shop), A3 (restaurant) or A4 (drinking establishment). This results in the potential for large units which would require alcohol and/or entertainment licences and the licensing committee would need to consider the implications of this.
- 6.5.8 In planning terms, in relation to the flexible nature of the proposed Class A1 or A3 uses (and thus also by default also Class A2 as a Class A3 can change to Class A2 under permitted development), this provides a degree of flexibility to the applicant to assist in seeking to attract future occupiers to the three proposed units. Future occupiers are unknown at this point in time, but the open plan nature and location of the units means they are likely to be suitably attractive to a range of occupiers. In principle, the proposed uses are considered to be appropriate individually and collectively. In order to minimise the impact on the existing residential units in the area and the proposed residential units on site conditions could be used to limit the hours of operation, hours for servicing/deliveries, noise from associated plant (see below), restrict the size of the units, restrict the size of outside areas for eating/drinking and their hours of use.
- 6.5.9 **Noise**
Noise can have a major effect on amenity and health and therefore quality of life. Policy DP26 and DP28 seek to ensure that new development does not cause noise disturbance to future occupiers or neighbouring properties. It states that development will not be granted for development that is likely to generate noise pollution or development that is sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided. It also states that the Council will seek to minimise the impact of noise from demolition and construction.
- 6.5.10 The Council's standard requirement is that that noise from operational plant is at least 5dB below the background noise level. Where it is anticipated that plant will have a noise that has a distinguishable, discrete continuous note and/or if there are distinct impulses then that plant should operate at least 10dB below the background noise level. Basement and sub basement plant rooms are proposed along with first floor plant rooms, small plant rooms adjacent to the lifts on all floors and an area to the roof within Centre Point tower and second floor plant rooms at Centre Point House. The exact plant specifications are unknown at this stage. A Noise and Vibration report has been provided and this states that the proposed plant will be designed to meet the Council's noise standards of 5dBA below

background levels. If the scheme were acceptable in all other respects a condition would have been recommended requiring the submission of further details of all plant and equipment once selected to demonstrate that the standard noise condition can be complied with.

- 6.5.11 The application site is adjacent to busy main roads which have the potential to create noise which could cause disturbance to residents of the proposed development. The applicant has submitted a PPG24 a noise and vibration report which confirms that the site falls within noise category C where planning permission should not normally be granted but there may be instances where noise mitigation measures may make development acceptable. Conditions are therefore recommended requiring measures to insulate the residential units against noise and vibration disturbance from external sources.

6.6 Other matters – sustainability, CIL, basement extension, wind

6.6.1 Sustainability

The overall approach to energy should be in line with the Mayor's Energy Hierarchy (i) using less energy; ii) supplying energy efficiently; ii) using renewable energy. In line with the first element of the hierarchy Policy DP22 requires BREEAM assessments to meet a minimum very good rating and Code for Sustainable Homes level 3. Camden's CPG also goes beyond these requiring a minimum 50% score in the energy, water and materials categories for the Code for Sustainable Homes and a minimum score of 60% in the energy, 60% in the water and 40% in the materials categories for the BREEAM assessment. In line with LDF and CPG requirements a Code for Sustainable Homes assessment has been submitted for the new residential units at the Intrepid Fox part of the site a BREEAM refurbishment (domestic buildings) pre assessment. These indicate that the level 4 score and 'excellent' can be achieved as can the minimum scores in the energy, water and materials sub-categories. The applicant has also submitted a BREEAM refurbishment (non domestic buildings) pre assessment for the commercial units and this indicates that a minimum 'very good' rating can be achieved. Because the retail units are being built to shell and core level only the use of a green lease or green building guide is proposed between the applicant and the future tenants to demonstrate compliance with BREEAM at design and post construction stages. A Code for Sustainable Homes and BREEAM post construction review has been secured via a S106 to ensure that these targets are achieved in the final design.

- 6.6.2 With regard to the second element of the hierarchy the site is within 1km radius of an existing or emerging CHP network (University College London) and within 500m radius of a potential network (British Museum). In line with CPG2 the development should therefore be capable of connecting to these networks in the future. The applicant has confirmed that capped connections and space for heat exchanger interfaces will be provided to allow future connections to a local heat network. The applicant is also in discussion with the adjacent land owner regarding the potential to transfer and use waste heat between the two sites. The CHP connection and further discussion with the adjacent landowner will be secured via a S106 to ensure that these targets are achieved in the final design.
- 6.6.3 With regard to the third element of the hierarchy there is a requirement for a 20% reduction in CO2 through the use of on-site renewable technologies. The applicant

has explored a range of renewable energy technologies (biomass, energy from waste, PV panels, solar water heating, wind turbines, ground source heat pump, and hydrogen fuel cell) does not propose the use of any renewable energy because of site constraints. The applicant does propose the use of a site wide air cooled condenser loop system, which will recover waste heat from the retail units being cooled will be used in the residential units when there is a heating demand. The use of this air source heat pump will be secured via a S106.

6.6.4 Community Infrastructure Levy (CIL)

The proposal will be liable for the Mayor of London's CIL as the additional floorspace exceeds 100sqm or one unit of residential accommodation. The proposal is not liable for a Crossrail S106 contribution as the uplift in retail, office or hotel floorspace is less than 500sqm. Based on the Mayor's CIL charging schedule and the information given on the plans, the CIL charge is likely to be £87,500 (1,750sqm uplift x £50). This will be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index. An informative will be attached to any consent advising the applicant of this charge.

6.6.5 Basement

The site is within an area susceptible to ground water flooding and slope stability issues. The proposal involves excavation as follows:

- An extension to the sub basement level of approximately 132sqm for the construction of the proposed car lifts; and
- An extension to the basement level of approximately 86sqm for the extension of the basement underneath the new Intrepid Fox building.

The applicant has therefore submitted a basement impact assessment in line with policy DP23 and DP27. The methodology has included the identification of potential surface and groundwater receptors; preparation of a conceptual site model; identification of feasible pollution sources; evaluation of the significance of the impacts; and identification of suitable and appropriate mitigation measures for all stages of the development.

- 6.6.6. The conclusion of the screening part of the report is that the site is located over Lynch Hill Gravels which are classified as forming part of a 'Secondary A' aquifer and that the sub basement extension will be below the ground water levels. The Report then goes on to provide more information with respect to these points and concludes that the aquifer is unlikely to be affected because of the significant thickness of London Clay overlying it. It is considered that the scheme complies with policies DP27 and DP23.

6.6.7 Wind

The applicant has submitted a wind report which considers the impact of the development on the local wind microclimate. The baseline for the existing wind conditions shows that there are a range of areas around the buildings which are suitable for sitting, standing and leisure walking and no locations suitable only for business walking or roadways (which are the windiest conditions). The windiest locations (leisure walking) are to the south of the tower and in isolated locations on Earnshaw Street and New Oxford Street. The baseline in terms of 'strong winds'

shows that wind speeds do not exceed Beaufort Force 6 (B6) and only reach B6 at six locations, which are again in similar locations (anything higher than 6 for a few hours a year is unlikely to cause a nuisance, anything in excess of 7 or 8 would impede walking).

- 6.6.8 The wind report shows that after the completion of the development there are five locations which are one category windier and nine locations which are one category calmer. With regard to 'strong winds' again the maximum speed is B6 and this is reached at five locations. The report concludes that there is one location adjacent to the proposed new entrance into the tower where a screen or landscaping may be required to minimise the wind impact.
- 6.6.9 The wind report also assesses a cumulative stage showing the completion of the development along with the potential redevelopment of the site to the south (St Giles/Consolidated site). In this instance the conclusion is that after completion of both developments there are the same five locations which are one category windier and the same nine locations which are one category calmer. With regard to 'strong winds' one location exceeds B7 and B6 and is reached at five locations. This windiest location is adjacent to the St Giles/Consolidated site and as it appears to be as a result of that development mitigation measures are not required as part of this application at Centre Point.

7. CONCLUSION

- 7.1 The proposed loss of B1 office floorspace is considered to be acceptable and appropriate given the site context and information submitted with the Economic Assessment. The proposal would provide an acceptable standard of residential accommodation and would not have a negative effect on the residential amenity of existing neighbours. The provision of 13 units of affordable housing on site is considered to be the maximum reasonable amount that can be provided by the development. The inclusion of a publicly accessible area to the upper floors of the building would unduly impact on the viability of the scheme. The construction impacts of the development can be managed and mitigated with S106 clauses and contributions.
- 7.2 Planning Permission is recommended subject to a S106 Legal Agreement covering the following Heads of Terms:
- Affordable housing – provision of 13 units on site (8 x one bedroom affordable rent, 3 x three bedroom and 2 x four bedroom social rent)
 - £3.17 million financial contributions for public realm/pedestrian/cycle improvements in the area
 - £1million financial contribution towards the Tottenham Court Road two way working scheme
 - £1.023 million financial contribution towards community facilities
 - £915,993 financial contribution towards employment and training
 - £310,735 financial contribution towards education
 - Local labour and procurement (including provision of 36 apprenticeships during construction phase and recruitment and support fee of £1,500)
 - Post construction Code for Sustainable Homes and BREEAM assessments and

compliance with energy statement.

- Construction Management Plan (CMP), including membership of 'St Giles Circus Projects Working Group' and consultation with TfL
- Highway works during construction on St Giles High Street
- Public realm management strategy
- Car capped development
- Travel Plans
- Servicing Management plan (SMP)

7.3 The proposed extension and internal and external works to the listed building are considered acceptable and the listed building consent application is recommended for approval.

8. LEGAL COMMENTS

8.1 Members are referred to the note from the Legal Division at the start of the Agenda.

Conditions 2013/1957/P:

1. The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:

Reason: For the avoidance of doubt and in the interest of proper planning.

3. Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:

- a) Plan, elevation and section drawings of all shopfronts and ground floor glazed screens a scale of 1:10 with sections of the framing, joints and fixings to the building fabric and floor at a scale of 1:1.
- b) Elevation and section drawings (including method of illumination) of proposed lettering to 34th floor of Centre Point Tower.
- c) Samples of the external cladding panels to residential parts of Centre Point House and new affordable housing block.
- d) Section details at 1:1 showing the details of the framing, joints and method of fixing the proposed glazing and panels to the external elevation of the residential parts of Centre Point House
- e) elevations of any gates to the new pedestrian link at ground floor level through Centre Point House

The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

4. The proposed glazed screens fitted to the ground floor of Centre Point Tower shall be clear glazed and be so maintained. No method of obscuring the glazing such as film or blinds shall be affixed to the glazing.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policies DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

5. No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials or satellite dishes shall be fixed or installed on the external face of the new building, without the prior approval in writing of the local planning authority.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

6. a) No development shall take place in each phase until the applicant has secured the implementation of a programme of archaeological mitigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority.

B) No development or demolition shall take place in each phase other than in accordance with the Written Scheme of Investigation approved under Part (A).

C) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (A), and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.

Reason: Heritage assets of archaeological interest may survive on the site. The local planning authority wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development, in accordance with recommendations given by the borough and in the NPPF.

7. The development hereby approved shall not commence until such time as a suitably qualified chartered engineer with membership of the appropriate professional body has been appointed to inspect, approve and monitor the critical elements of both permanent and temporary basement construction works

throughout their duration to ensure compliance with the design which has been checked and approved by a building control body. Details of the appointment and the appointee's responsibilities shall be submitted to and approved in writing by the local planning authority prior to the commencement of development. Any subsequent change or reappointment shall be confirmed forthwith for the duration of the construction works.

Reason: To safeguard the appearance and structural stability of neighbouring buildings and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Development Policies and policy DP27 (Basements and Lightwells) of the London Borough of Camden Local Development Framework Development Policies.

8. No works below ground level comprised within the development hereby permitted shall be undertaken at any time when Crossrail are undertaking tunnelling or shaft works within 100 metres of the land on which the development hereby permitted is situated, unless specifically agreed to in advance, and in writing, by Crossrail Limited.

Reason: To ensure that the development does not impact on the Crossrail scheme, in accordance with London Plan Policy 6.1 and 6.2, 2011 Table 6.1 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

- 9 The development hereby permitted shall not be commenced until detailed design and method statements (developed in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:
- provide details on all structures
 - accommodate the location of the existing London Underground structures and tunnels
 - accommodate ground movement arising from the construction thereof
 - and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan Policy 6.1 and 6.2, Table 6.1 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

- 10 A minimum of 50% of the ground floor commercial floorspace in Centre Point House (including 101 New Oxford Street and 15-22 St Giles High Street) shall be provided as class A1 retail floorspace

Reason: To ensure a minimum provision of retail space and to prevent an over concentration of food and drink uses in this Central London location in accordance with policy CS7 of the London Borough of Camden Local Development Framework Core Strategy and policy DP12 of the London Borough of Camden Local Development Framework Development Policies.

11. The lifetime homes features and facilities in each relevant part of the approved development, as indicated on the drawings and documents hereby approved, shall be provided in their entirety prior to the first occupation of any of the new residential units within that part.

Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policy DP6 of the London Borough of Camden Local Development Framework Development Policies.

12. Details of hard and soft landscaping including tree/plant species and sizes, all hard landscape materials, play structures, and means of enclosure of all unbuilt, open areas shall be submitted to and approved in writing by the local planning authority before the relevant parts of work are begun. Such details shall include a summary of consultation with residents of Aldwych Buildings and whether the scheme has changed as a result, details on how the spaces are accessible by all including details on level access, ramp gradients, landings, handrails, step dimensions, colour contrast nosings etc. Implementation of the hard and soft landscaping and the boundary treatment shall be carried out in accordance with the approved details.

Reason: To enable the Local Planning Authority to ensure a reasonable standard of visual amenity in the scheme in accordance with the requirements of policies CS14 and CS15 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.

13. All hard and soft landscaping works shall be carried out to a reasonable standard in accordance with the approved landscape details by not later than the end of the planting season following completion of the relevant part of the development. Any newly planted trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a satisfactory standard of visual amenity in the scheme in accordance with the requirements of policies CS14, and CS15 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.

14. No part of the development hereby approved shall be occupied until full details of

the position, specification in terms of luminance and typical design of fixtures in respect of external lighting has been submitted to and approved by the Local Planning Authority. The details shall include the provision of street lighting on the facades of the building where possible. The details shall not be implemented other than in accordance with the scheme as approved.

Reason: To ensure a satisfactory standard of visual amenity and a safe and secure environment in accordance with the requirements of policies CS14 and CS15 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.

15. Full details of a biodiverse, substrate-based extensive living roof shall be submitted to and approved by the Local Planning Authority in writing before the development commences. The development shall not be carried out otherwise than in accordance with the details thus approved and shall be fully implemented before the commencement of any of the uses hereby approved. This shall include a detailed maintenance plan, details of its construction and the materials used, to include a section at a scale of 1:20, and full planting details. The substrate depth should vary between 80mm and 150mm with peaks and troughs, but should average at least 130mm.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies CS13, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies

16. Prior to the first use of the premises for the A3 or A4 floorspace hereby permitted, full details of a scheme for extract ventilation, including manufacturers specifications, noise levels and attenuation, shall be submitted to and approved by the Local Planning Authority in writing. The use shall not proceed other than in complete accordance with such scheme as has been approved. All such measures shall be retained and maintained in accordance with the manufacturers' recommendations.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy and policies DP12 and DP26 of the London Borough of Camden Local Development Framework Development Policies.

17. No plant or machinery (other than that otherwise approved under condition no.16) shall be installed on the external parts of the buildings other than in the areas identified within the approved plans.

Reason: To ensure that the appearance of any external plant is compatible with the appearance of the building and the area and to ensure that residential amenities are protected, in accordance with the requirements of policies CS5 and CS14 of the London Borough of Camden Local Development Framework Core Strategy and policies DP24, DP25 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

18. Noise levels at a point 1 metre external to sensitive facades shall be at least 5dB(A) less than the existing background measurement (LA90), expressed in dB(A) when all plant/equipment (or any part of it) is in operation unless the plant/equipment hereby permitted will have a noise that has a distinguishable, discrete continuous note (whine, hiss, screech, hum) and/or if there are distinct impulses (bangs, clicks, clatters, thumps), then the noise levels from that piece of plant/equipment at any sensitive façade shall be at least 10dB(A) below the LA90, expressed in dB(A).

Reason: To safeguard the amenities of the [adjoining] premises [and the area generally] in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

19. Glazing to the new residential units shall be sufficient to provide for "good" internal noise levels as per BS 8233 and the WHO internal noise levels guides and shall be permanently retained and maintained thereafter.

Reason: To safeguard the amenities of future occupants in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies

20. Before the Class A1 or A3 or A4 floorspace at Centre Point House commences sound insulation shall be provided in accordance with a scheme to be submitted to and approved in writing by the local planning authority prior to the commencement of development. The use shall thereafter not be carried out other than in complete compliance with the approved scheme.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP12 of the London Borough of Camden Local Development Framework Development Policies.

21. None of the A1 or A3 or A4 uses hereby permitted shall occur outside of the following times: 08:00 - 23:00 Monday to Sunday and on Public/Bank Holidays, and no customers shall be permitted within these premises outside of the approved hours of use..

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy and

policy DP12, DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

22. The approved outdoor terrace area on the bridge link roof shall not be used outside the hours of 08:00 to 21:00, 7 days a week..

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP12 of the London Borough of Camden Local Development Framework Development Policies.

23. No loading or unloading of goods, including fuel, by vehicles arriving at or departing from the premises shall be carried out outside the following times: 08:00 - 23:00 Monday to Sunday and on Public/Bank Holidays.

Reason: To safeguard amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP12 of the London Borough of Camden Local Development Framework Development Policies.

24. No loading or unloading of goods, including fuel, by vehicles arriving at or departing from the premises shall be carried out at the application site otherwise than via the servicing bay at Earnshaw Street. At no time should servicing be carried out from the public highway.

Reason: To avoid obstruction of the surrounding streets and to safeguard amenities of adjacent premises in accordance with the requirements of policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policy DP16 of the London Borough of Camden Local Development Framework Development Policies.

25. The east-west pedestrian route through Centre Point House along shown on drawing numbers 552-19402-CPA and 552-19642-CPH hereby approved shall be carried out and available for public use prior to first occupation of the approved residential units

Reason: In order to ensure that the development makes sufficient provision for permeability and public access across the site in accordance with the requirements of policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policy DP17 of the London Borough of Camden Local Development Framework Development Policies.

26. The relevant part of development shall not commence until details of the proposed public cycle storage areas for
- (a) 169 cycles for the residential units accommodated within the basement area;
 - (b) 33 cycles for the commercial units (staff parking) accommodated within the basement area
 - (c) 33 cycles for the commercial units (customers)

have been submitted to and approved in writing by the Council. These spaces shall be provided prior to occupation of the development and shall thereafter be permanently retained and used for no purpose other than for the parking of bicycles for users and occupiers of the development, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policy DP17 of the London Borough of Camden Local Development Framework Development Policies.

27. The 10 Electric Vehicle Charging Points shown on the approved drawings in the basement shall be provided prior to occupation of the development and shall thereafter be permanently retained and used for no purpose other than for the parking for users and occupiers of the development, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with Policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP18, DP19 of the London Borough of Camden Local Development Framework Development Policies

28. The refuse/recycling storage areas shown on the approved drawings in the basement of the main building and the ground floor of Aldwych Workshops shall be provided prior to occupation of the development and shall thereafter be permanently retained and used for no purpose other than refuse/recycling storage areas, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CS18 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

informatives

1. For the avoidance of doubt, any highway and public realm improvement works associated with this planning application will be implemented by LB Camden. This includes works on land within the applicant's ownership (red line boundary). Such areas of land are currently maintained as public highway.
2. Notwithstanding the drawings hereby approved the public realm works around the building should be in accordance with Gillespies proposals. Further discussion is required between the landowner and Camden and other stakeholders to coordinate the design and implementation of this work.
3. This permission is granted without prejudice to the necessity of obtaining the necessary licenses under the Licensing Act 2003. The site is within the Seven Dials Special Policy Area where if representations are received for new licensing applications, they are likely to be refused. Further information can be found in the

Councils Statement of Licensing Policy 2011

<http://www.camden.gov.uk/ccm/content/business/business-regulations/licensing-and-permits/general-licensing-information/licensing-policy.en>

4. With regard to condition 6 the development of this site has the potential to damage heritage assets of archaeological interest. The applicant should therefore submit detailed proposals in the form of an archaeological project design. The design should be in accordance with the appropriate English Heritage guidelines. Should significant archaeological remains be encountered in the course of the initial field evaluation, an appropriate mitigation strategy, which may include archaeological excavation, is likely to be necessary.
5. You are advised that condition 21 means that no customers shall be on the premises and no noise generating activities associated with the use, including preparation and clearing up, shall be carried out otherwise than within the permitted time.
6. with regard to condition 26, the 33 cycle spaces for commercial customers could be located within the site buildings where possible (either at ground floor level or at basement level with step free access).
7. With regard to condition 11 you are advised to look at Camden Planning Guidance for further information and if necessary consult the Access Officer, Camden Town Hall, Argyle Street WC1H 8EQ, (tel: 020-7974 5124) to ensure that the internal layout of the building is acceptable with regards to accessibility by future occupiers and their changing needs over time.
8. The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; excavation; construction methods; security; boundary treatment; safety barriers; landscaping and lighting
9. The developer and their representatives are reminded that this decision does not discharge their requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.
10. The Mayor of London introduced a Community Infrastructure Levy (CIL) to help pay for Crossrail on 1st April 2012. Any permission granted after this time which adds more than 100sqm of new floorspace or a new dwelling will need to pay this CIL. It will be collected by Camden on behalf of the Mayor of London. Camden will be sending out liability notices setting out how much CIL will need to be paid if an affected planning application is implemented and who will be liable.

The proposed charge in Camden will be £50 per sqm on all uses except affordable housing, education, healthcare, and development by charities for their charitable purposes. You will be expected to advise us when planning permissions are implemented. Please use the forms at the link below to advise who will be paying the CIL and when the development is to commence. You can also access forms to

allow you to provide us with more information which can be taken into account in your CIL calculation and to apply for relief from CIL.

<http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil>

We will then issue a CIL demand notice setting out what monies needs to paid when and how to pay. Failure to notify Camden of the commencement of development will result in a surcharge of £2500 or 20% being added to the CIL payment. Other surcharges may also apply for failure to assume liability and late payment. Payments will also be subject to indexation in line with the construction costs index.

Please send CIL related documents or correspondence to CIL@Camden.gov.uk

11. Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts which cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Argyle Street WC1H 8EQ, (tel: 020-7974 6941).
12. Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Compliance and Enforcement team [Regulatory Services], Camden Town Hall, Argyle Street, WC1H 8EQ (Tel. No. 020 7974 4444 or on the website <http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-the-environmental-health-team.en> or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.
13. This permission is granted without prejudice to the necessity of obtaining consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Application forms may be obtained from the Council's website, www.camden.gov.uk/planning or the Camden Contact Centre on Tel: 020 7974 4444 or email env.devcon@camden.gov.uk.
14. Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.
15. Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to

discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

16. There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the options available at this site.
17. Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 8507 4890 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.
18. Swimming Pools - Where the proposal includes a swimming pool Thames Water requests that the following conditions are adhered to with regard to the emptying of swimming pools into a public sewer to prevent the risk of flooding or surcharging: -
1. The pool to be emptied overnight and in dry periods. 2. The discharge rate is controlled such that it does not exceed a flow rate of 5 litres/ second into the public sewer network.
19. Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Further information on the above is available in a leaflet, 'Best Management Practices for Catering Establishments' which can be requested by telephoning 0203 577 9963.
20. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
21. Any property involving a swimming pool with a volume exceeding 10 cubic metres of water will need metering. The Applicant should contact Thames water on 0845 9200 800.

22. There is a Thames Water main crossing the development site which may/will need to be diverted at the Developer's cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0845 850 2777 for further information.
22. Reasons for granting planning permission

The proposed development is in general accordance with the London Borough of Camden Local Development Framework Core Strategy with particular regard to [insert policy number and title] and with the London Borough of Camden Local Development Framework Development Policies with particular regard to policies CS1 – Distribution of growth, CS2 – Growth areas, CS5 – Managing the impact of growth and development, CS6 – Providing quality homes, CS7 – Promoting Camden's centres and shops, CS8 – Promoting a successful and inclusive Camden economy, CS9 – Achieving a successful Central London, CS10 – Supporting community facilities and services, CS11 – Promoting sustainable and efficient travel, CS13 – Tackling climate change through promoting higher environmental standards, CS14 – Promoting high quality places and conserving our heritage, CS15 – Protecting and improving our parks and open spaces and encouraging biodiversity, CS16 – Improving Camden's health and wellbeing, CS17 – Making Camden a safer place, CS18 – Dealing with our waste and encouraging recycling, CS19 – Delivering and monitoring the Core Strategy of the London Borough of Camden Local Development Framework Core Strategy and policies DP1 – Mixed use development, DP2 – Making full use of Camden's capacity for housing, DP3 – Contributions to the supply of affordable housing, DP5 – Homes of different sizes, DP6 – Lifetime homes and wheelchair homes, DP10 – Helping and promoting small and independent shops, DP12 – Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses, DP13 – Employment premises and sites, DP15 – Community and leisure uses, DP16 – The transport implications of development, DP17 – Walking, cycling and public transport, DP18 – Parking standards and limiting the availability of car parking, DP19 – Managing the impact of parking, DP20 – Movement of goods and materials, DP21 – Development connecting to the highway network, DP22 – Promoting sustainable design and construction, DP23 – Water, DP24 – Securing high quality design, DP25 – Conserving Camden's heritage, DP26 – Managing the impact of development on occupiers and neighbours, DP27 – Basements and lightwells, DP28 – Noise and vibration, DP29 – Improving access, DP30 – Shopfronts, DP31 – Provision of, and improvements to, open space and outdoor sport and recreation facilities, DP32 – Air quality and Camden's clear zone, of the London Borough of Camden Local Development Framework Development Policies. Furthermore the proposal accords with the specific policy requirements in respect of the following principal considerations:- The proposed loss of B1 office floorspace is considered to be acceptable and appropriate given the site context and information submitted with the Economic Assessment. The proposal would provide an acceptable standard of residential accommodation and would not have a negative effect on the residential amenity of existing neighbours. The provision of 13 units of affordable housing on site is considered to be the maximum reasonable amount that can be provided by the development. The inclusion of a publicly accessible area to the upper floors of the building would unduly impact on the viability of the scheme. The construction impacts of the development can be managed and mitigated with S106 clauses and contributions.

Conditions 2013/1961/L:

1. The works hereby permitted shall be begun not later than the end of three years from the date of this consent.

Reason: In order to comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990. only in accordance with plans

2. The proposed glazed screens fitted to the ground floor of Centre Point Tower shall be clear glazed and be so maintained. No method of obscuring the glazing such as film or blinds shall be affixed to the glazing unless otherwise agreed in writing with the Local Planning Authority

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

3. Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:
 - a) Plan, elevation and section drawings of all shopfronts and ground floor glazed screens a scale of 1:10 with sections of the framing, joints and fixings to the building fabric and floor at a scale of 1:1.
 - b) Elevation and section drawings (including method of illumination) of proposed lettering to 34th floor of Centre Point Tower.
 - c) Samples of the external cladding panels to residential parts of Centre Point House and new affordable housing block.
 - d) Section details at 1:1 showing the details of the framing, joints and method of fixing the proposed glazing and panels to the external elevation of the residential parts of Centre Point House

The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

3. Full constructional details of the reinstated staircase, including plans, sections and elevations at no less than 1:20 scale, which are clearly annotated to demonstrate the position and amount of original fabric to be reinstated, shall be submitted to and approved in writing by the Council as local planning authority before the relevant part of the works are begun.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

Informatives

1. You are advised that any works of alterations or upgrading not included on the approved drawings which are required to satisfy Building Regulations or Fire

Certification may require a further application for listed building consent.

2. Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Compliance and Enforcement team [Regulatory Services], Camden Town Hall, Argyle Street, WC1H 8EQ (Tel. No. 020 7974 4444 or on the website <http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-the-environmental-health-team.en> or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.

3. Reasons for granting listed building consent.

The proposed development is in general accordance with particular regard to the London Borough of Camden Local Development Framework Core Strategy, with particular regard to policy CS14 (Promoting high quality places and conserving our heritage); and the London Borough of Camden Local Development Framework Development Policies, with particular regard to policy DP25 (Conserving Camden's heritage). For a more detailed understanding of the reasons for the granting of this listed building consent, please refer to the officers report



Application No: 2013/1957/P

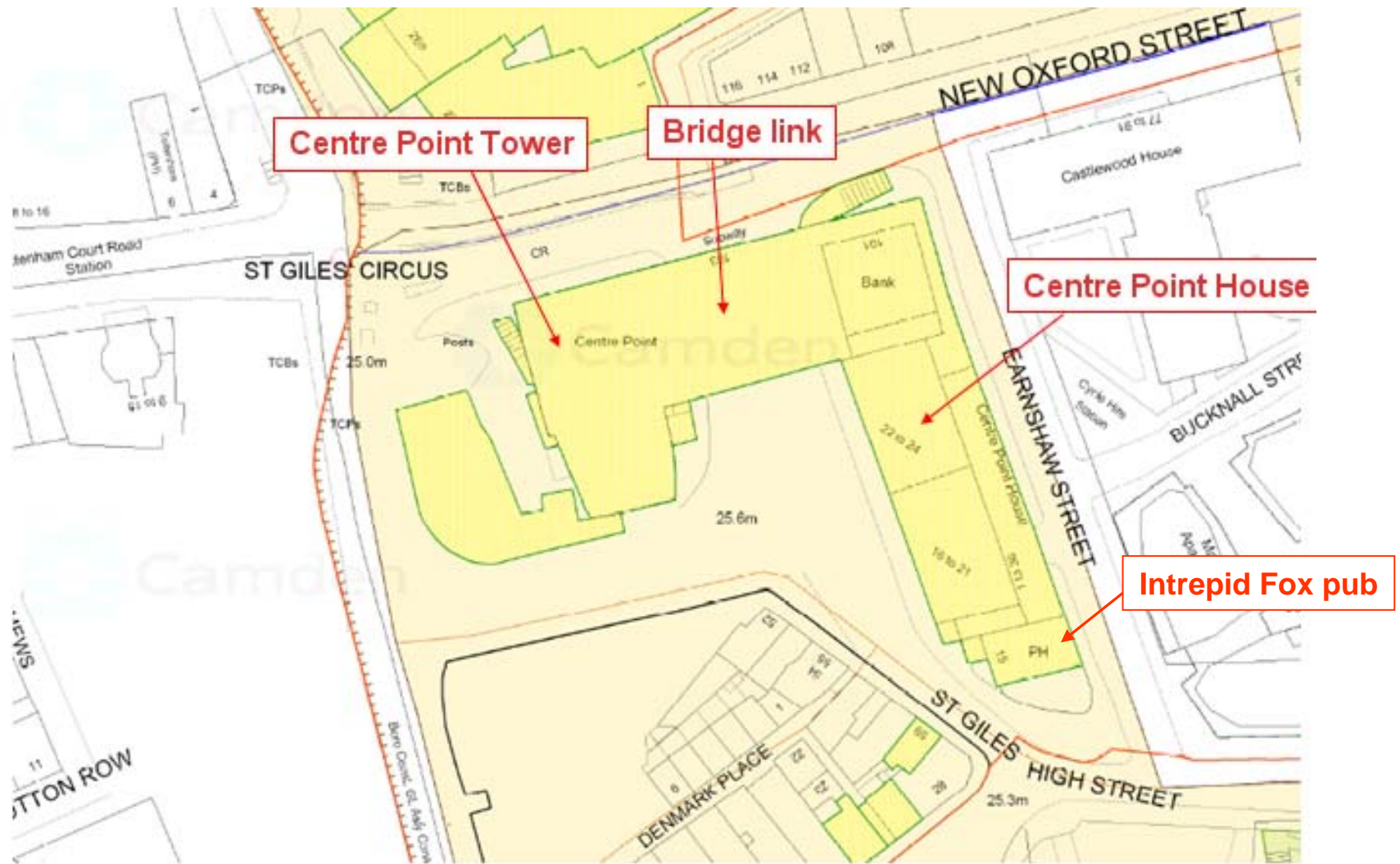
**Centre Point Tower, Centre Point Link and Centre Point House
101-103 New Oxford Street and 5-24 St Giles High Street London
WC1A 1DD**

**Scale:
1:1250
Date:
21-Jun-13**



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Site location plan



redline plan



Centre Point Tower



View from New Oxford Street



View from St Giles High Street

Centre Point Tower



View from Charing Cross Road/New Oxford Street junction
prior to commencement of Crossrail/LUL construction works

Centre Point House

Rear elevation to Earnshaw Street



Front elevation to St Giles High Street





Bridge Link

St Giles High Street

Elevation to New Oxford Street



Bridge Link

Eastern staircase to
St Giles High Street

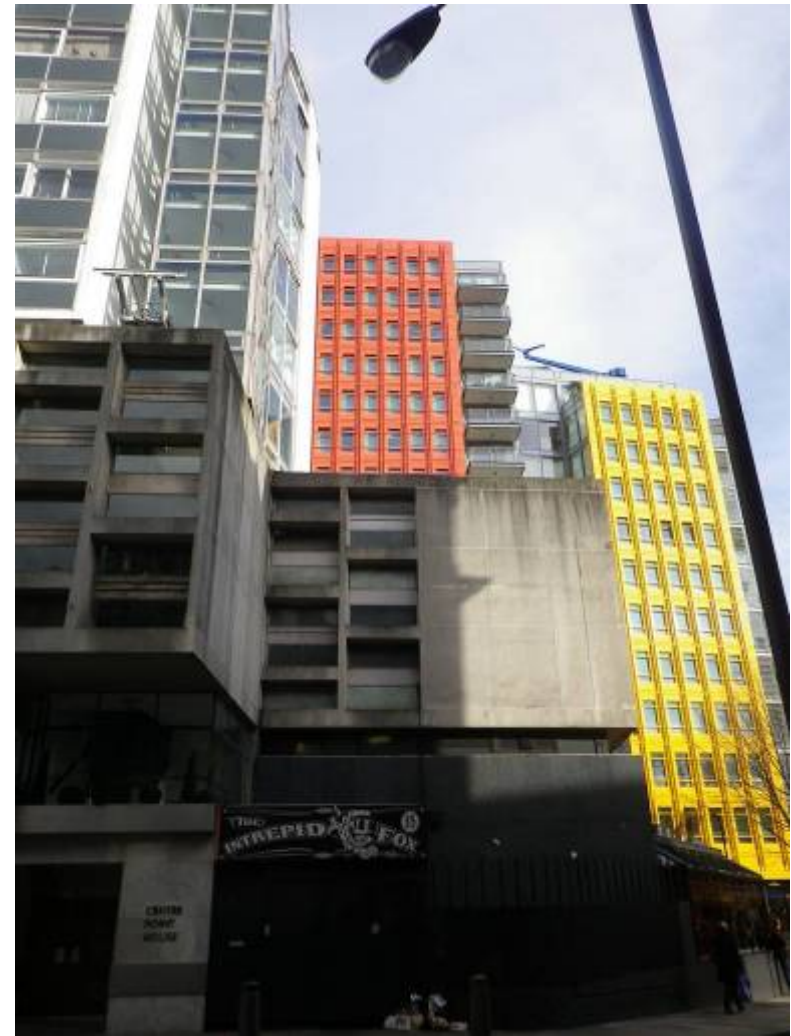


Elevation to St Giles High Street

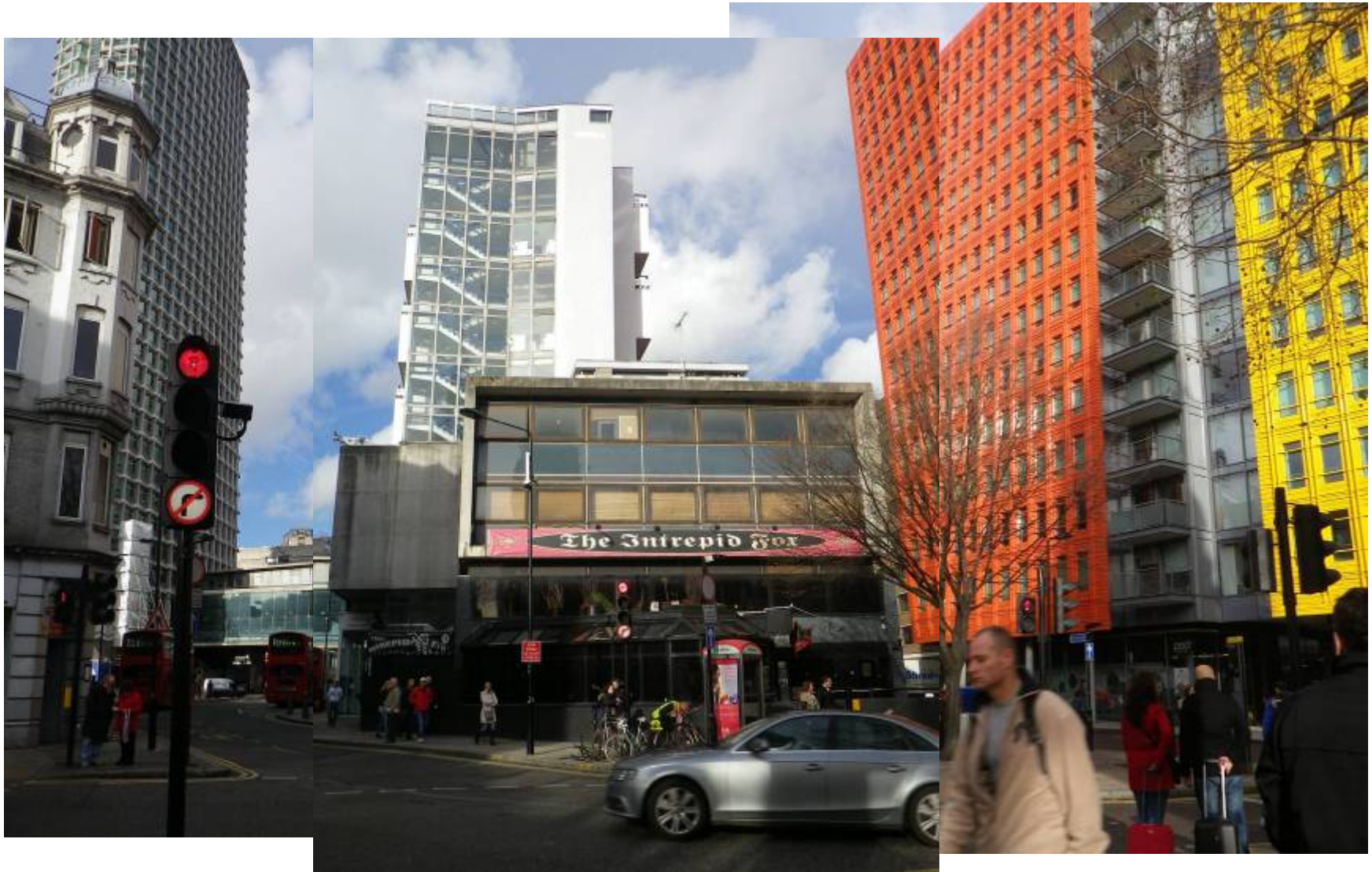


Intrepid Fox pub

Elevation to St Giles High Street (west elevation)



Corner of Earnshaw St and St Giles High Street
(east and south elevations)



Intrepid Fox pub

View from St Giles Church (south elevation)

Existing external stairs
to Centre Point Tower

Western staircase
from New Oxford St



Eastern staircase to
St Giles High Street

Centre Point Tower – office accommodation



Electricity cable risers



Lowered ceilings

Centre Point Tower – office accommodation



Open plan office space



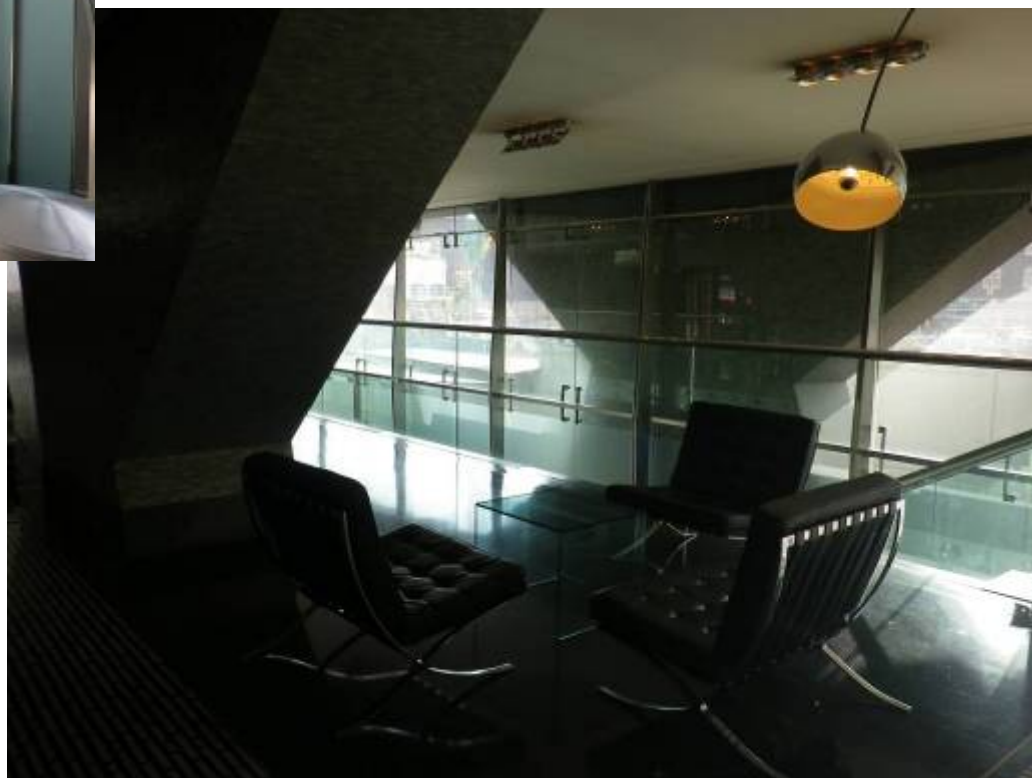
Offices and kitchen enclosures on outside

Centre Point Tower



Ground floor reception area

Mezzanine reception area



Centre Point Bridge link



Lower floor conference facilities

Top floor offices



Centre Point House



Office accommodation

Residential unit



Earnshaw Street



Vehicular access to car ramp access
down to basement and informal refuse area

Bus stands

Earnshaw Street



Residential entrance
to Matilda Apartments



Vehicular access down
to car ramp and informal
refuse area



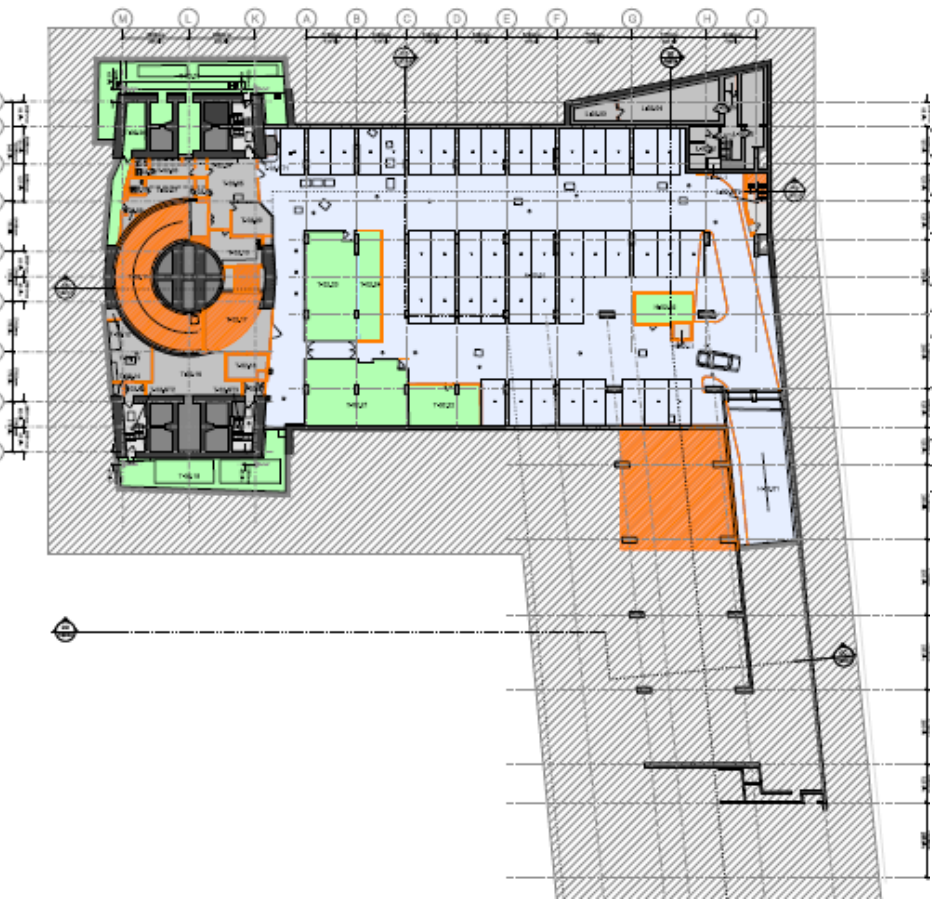
Basement area

Cycle parking

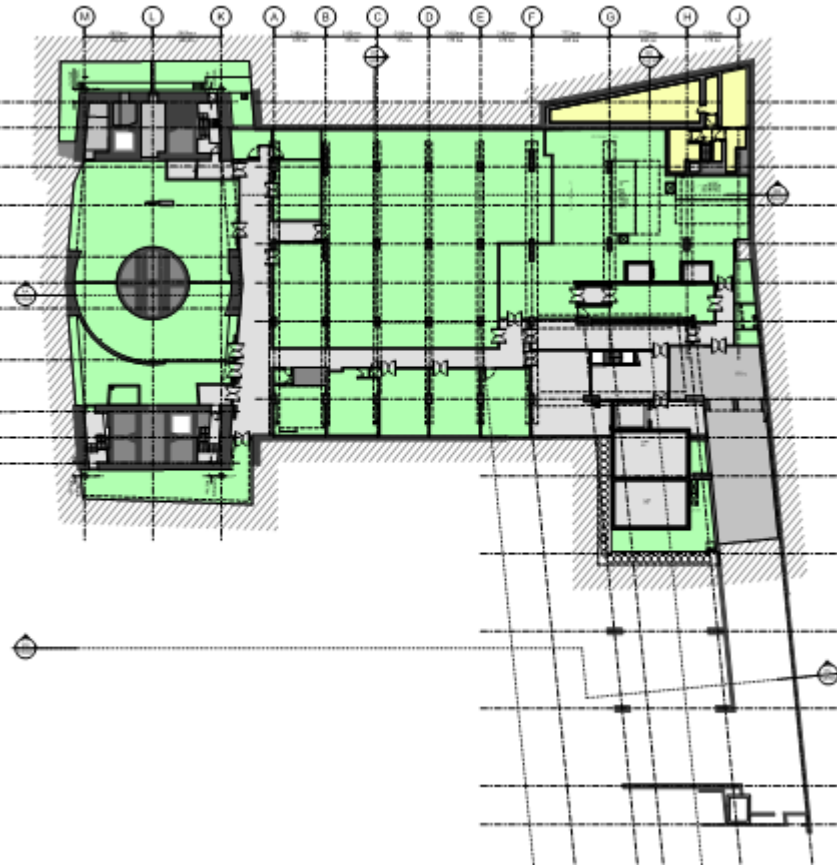
Ramp access from Earnshaw St



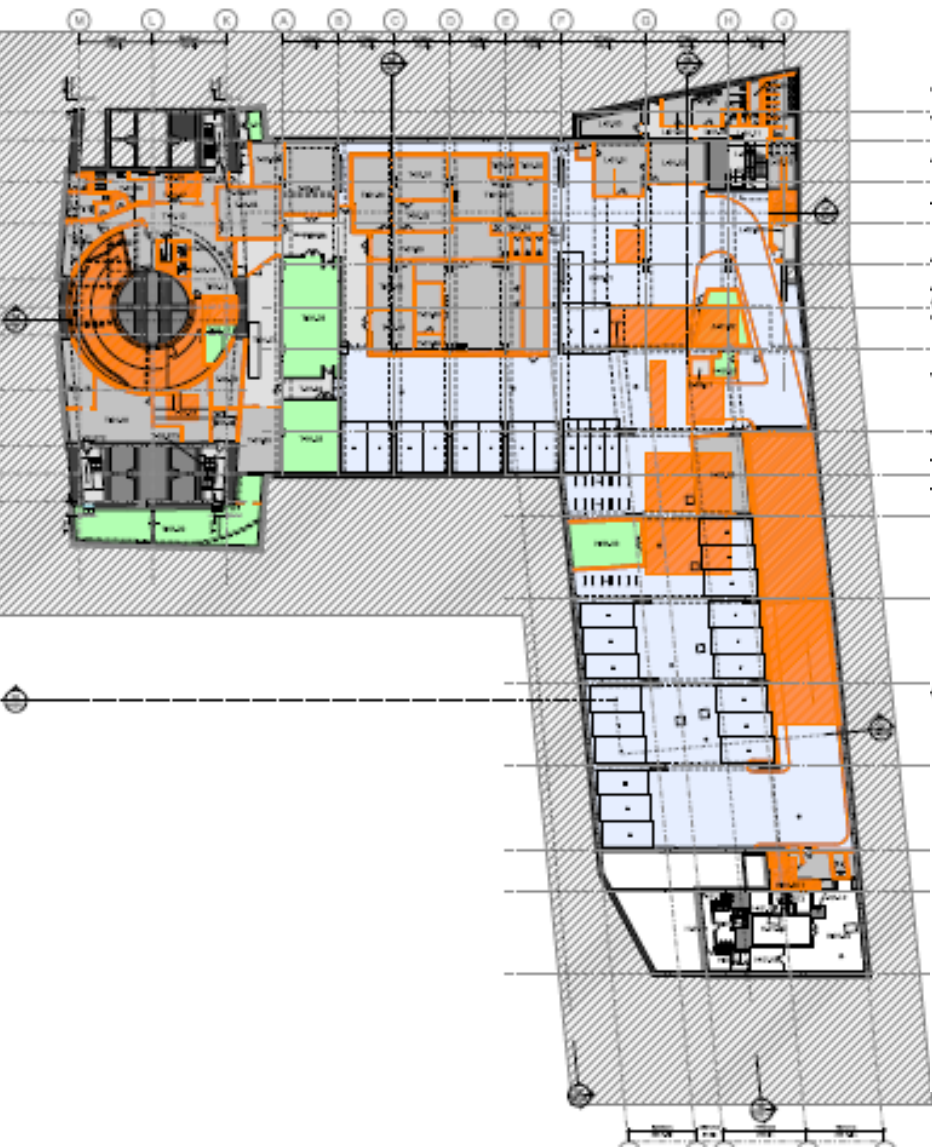
Existing sub basement plan



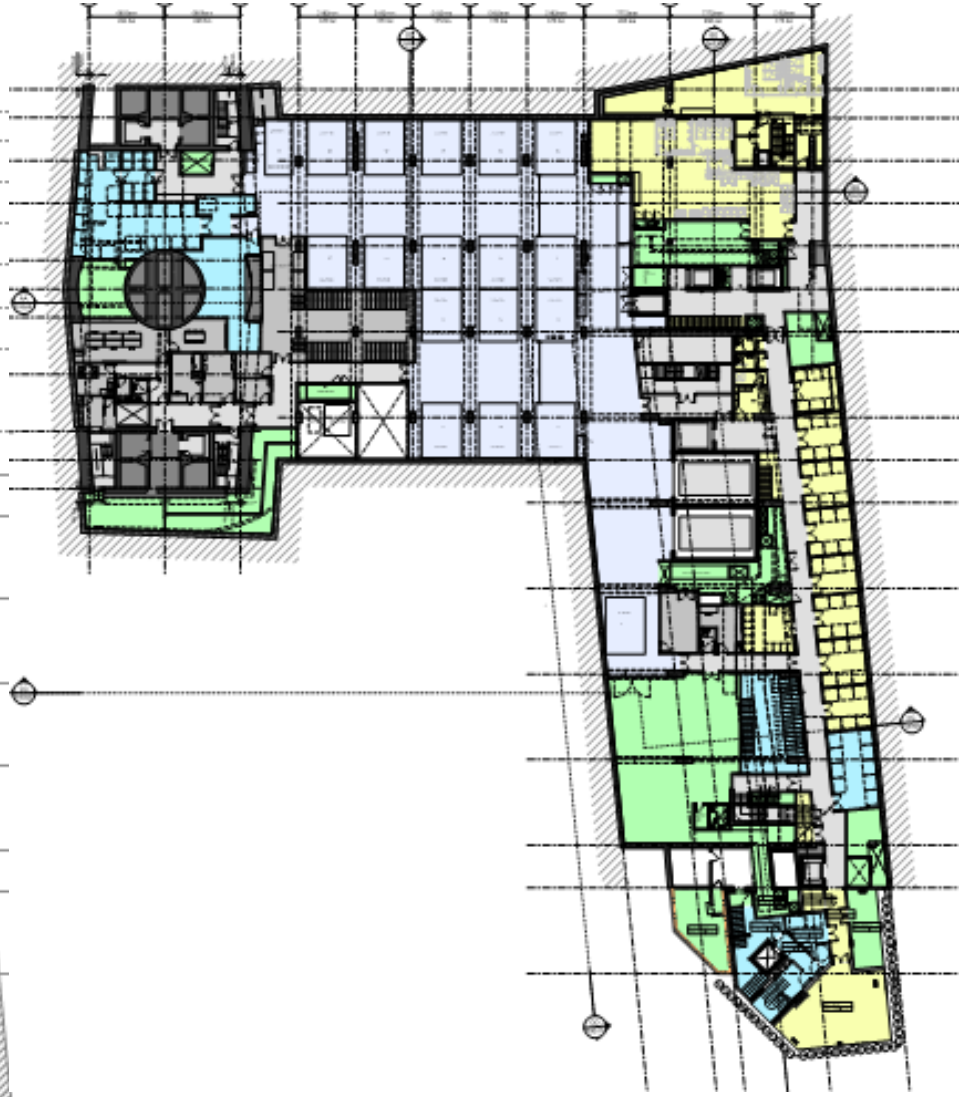
Proposed sub basement plan



Existing basement plan



proposed basement plan



Existing ground floor plan



proposed ground floor plan



Existing ground floor mezzanine plan



Proposed ground floor mezzanine plan



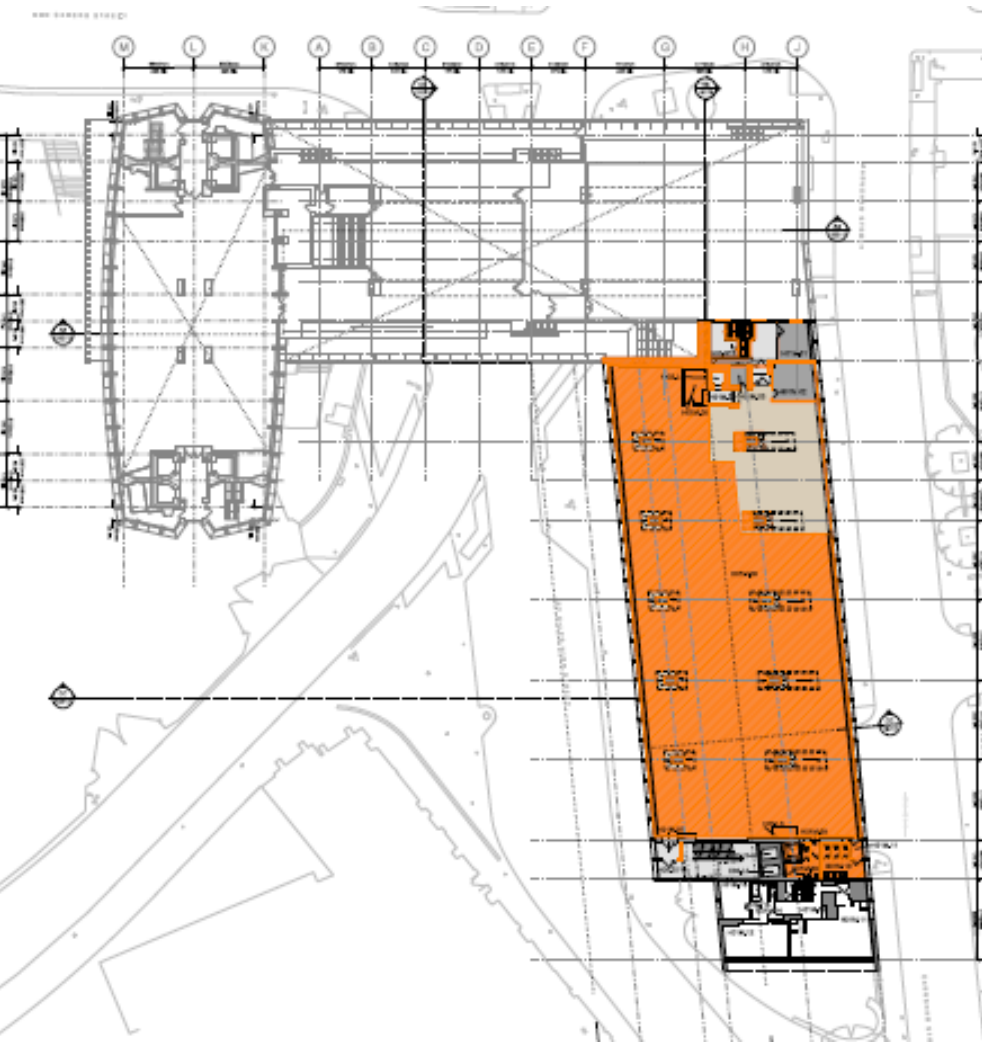
Existing first floor plan



Proposed first floor plan



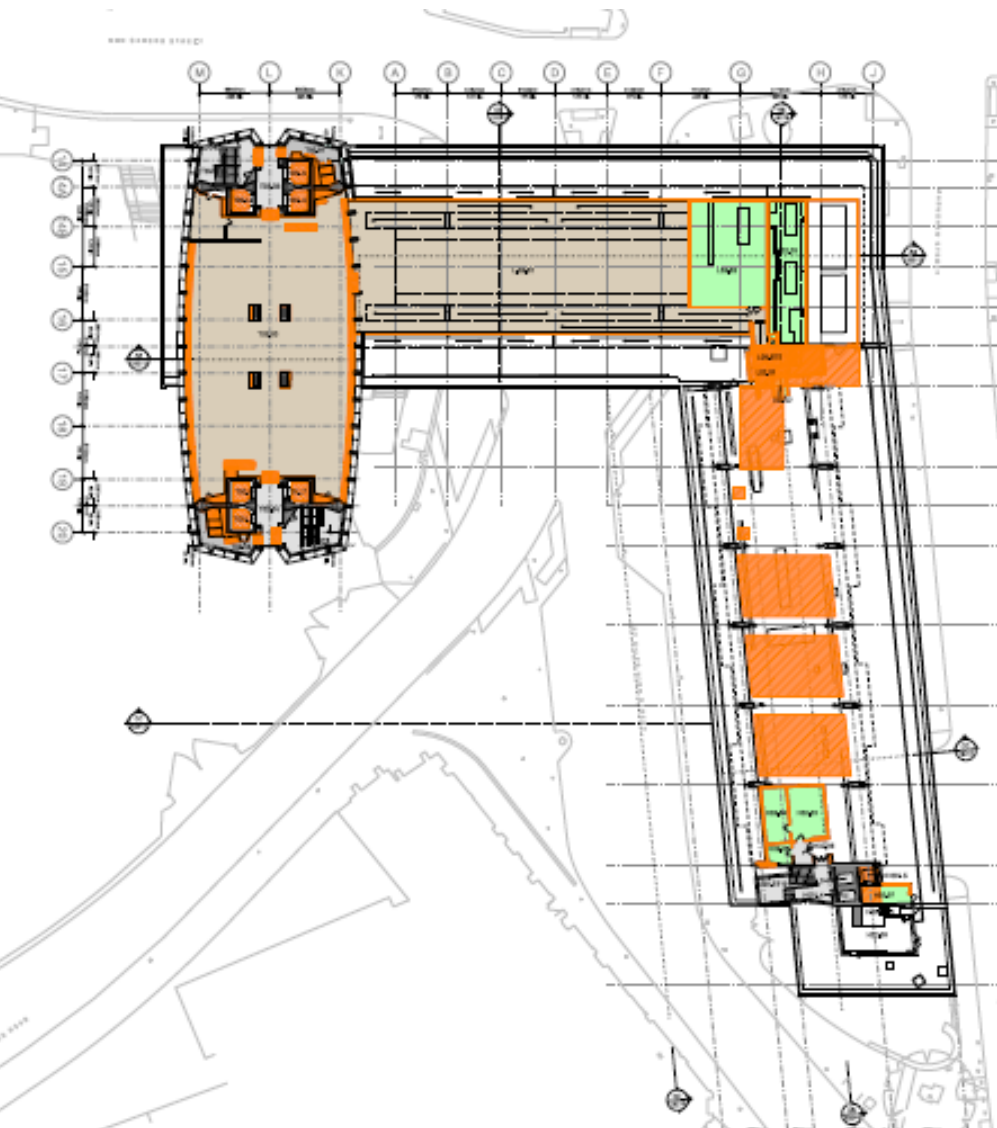
Existing first floor mezzanine plan



Proposed first floor mezzanine plan



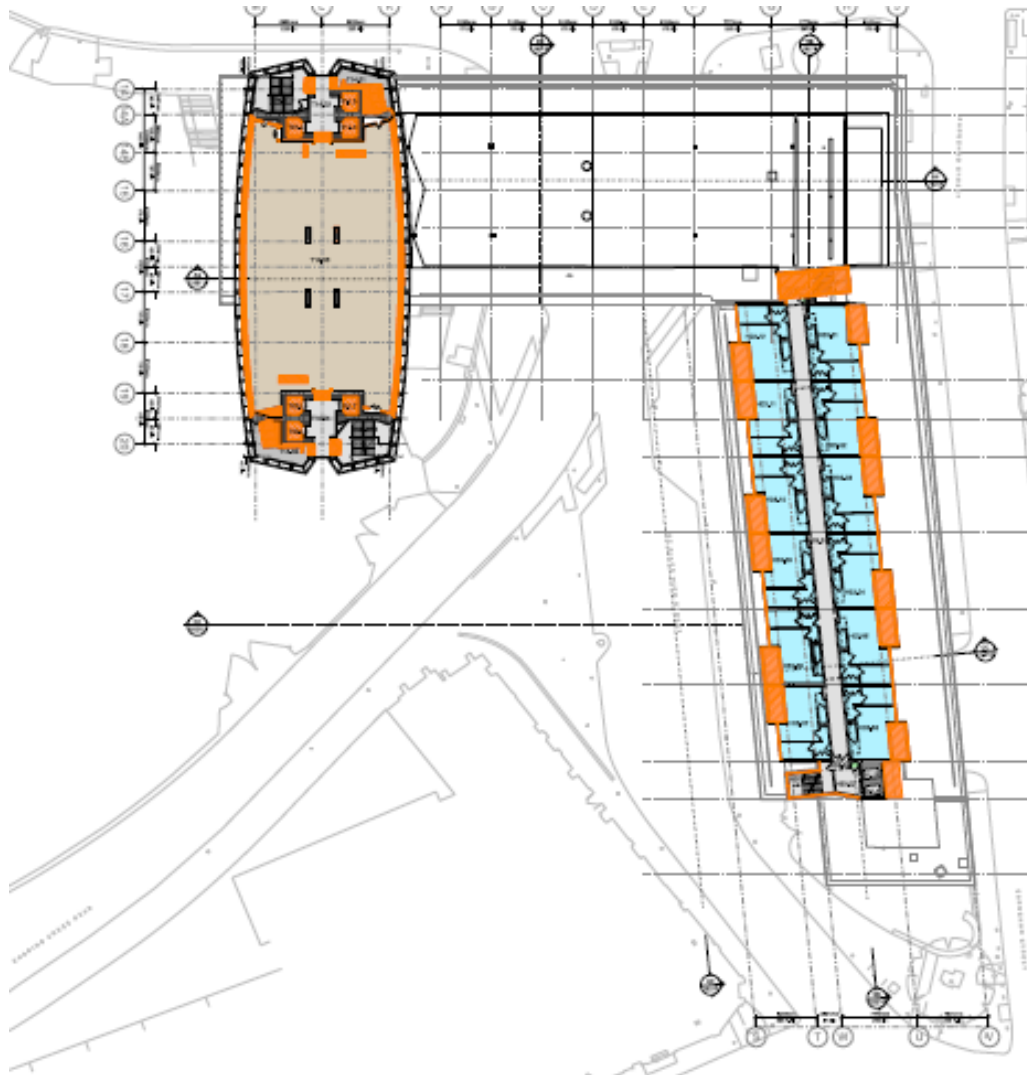
Existing second floor plan



proposed second floor plan



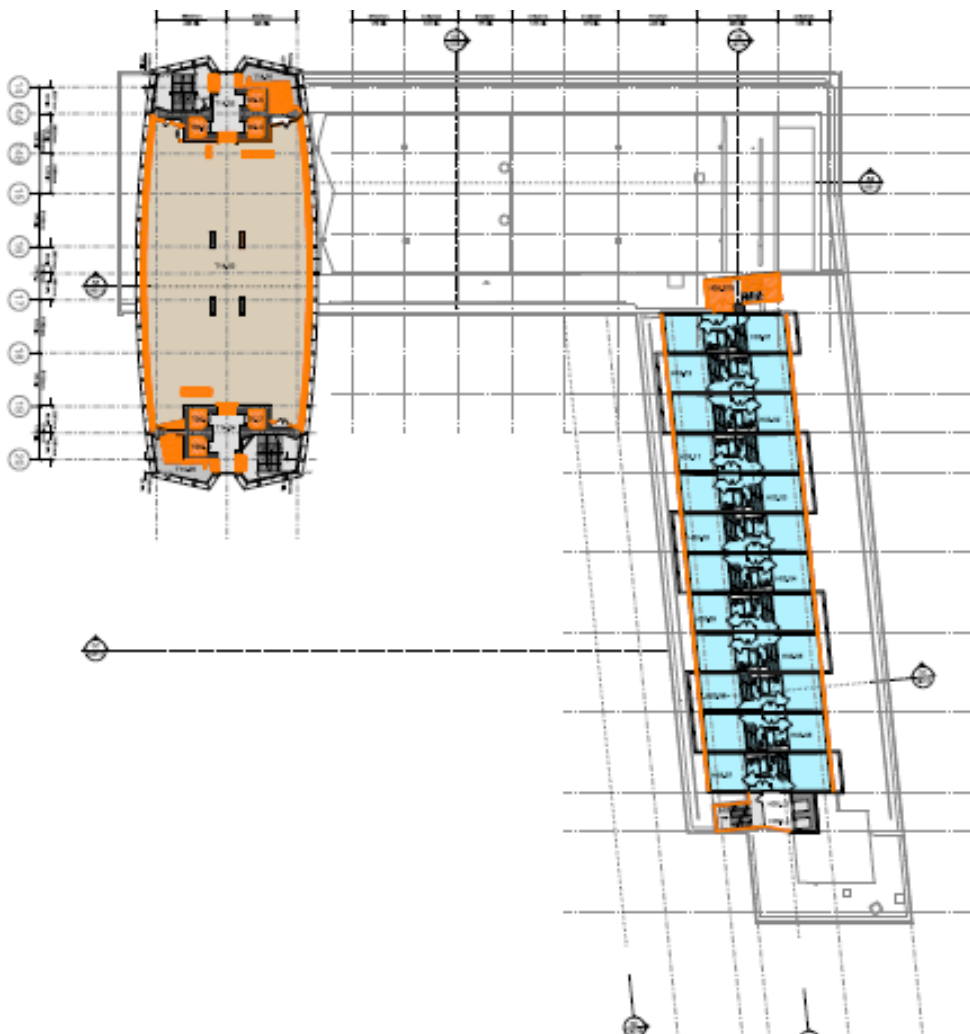
Existing third floor plan



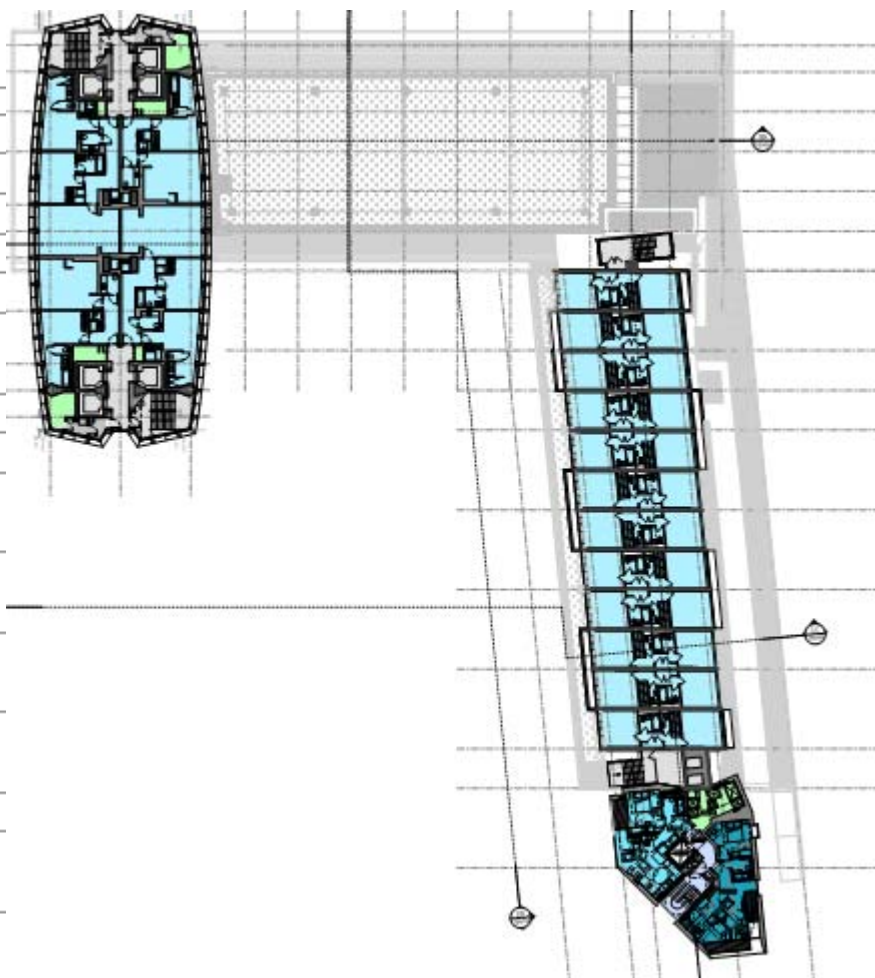
Proposed third floor plan



Existing fourth floor plan



Proposed fourth floor plan



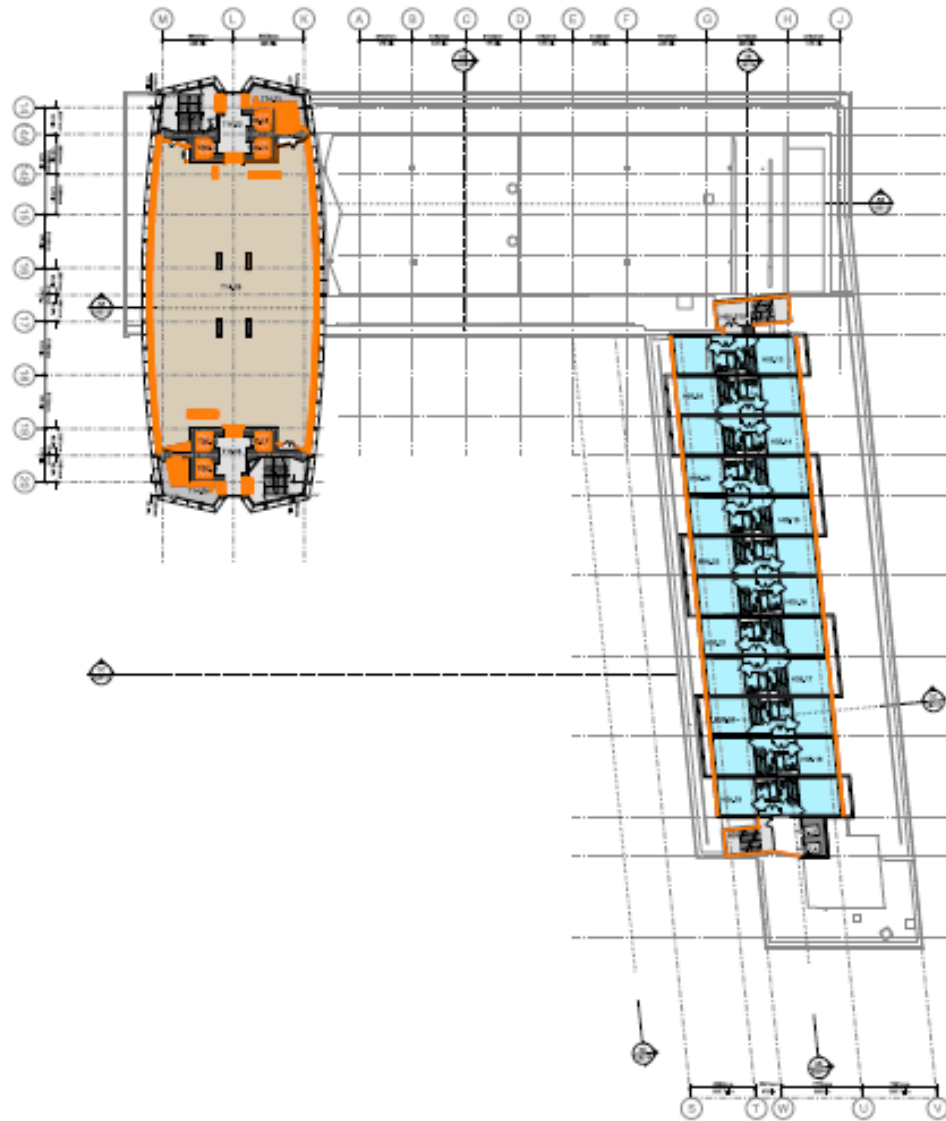
Existing fifth floor plan



Proposed fifth floor plan



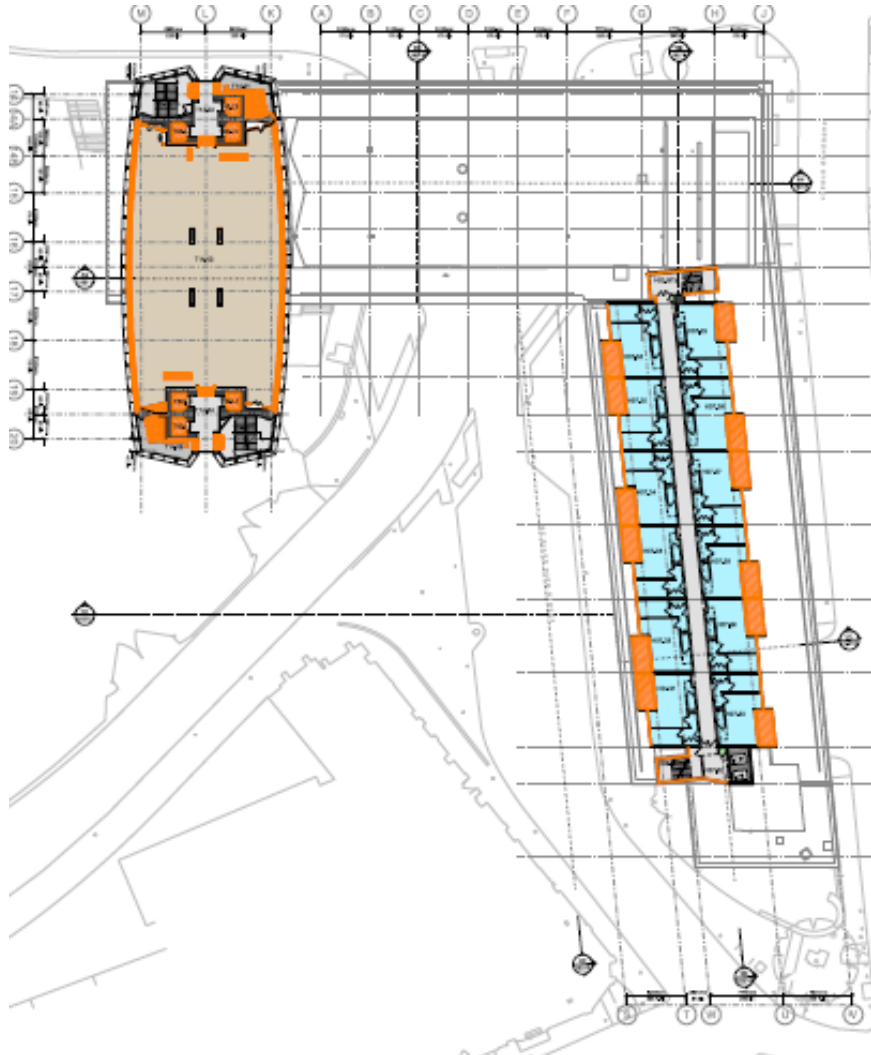
Existing sixth floor plan



proposed sixth floor plan



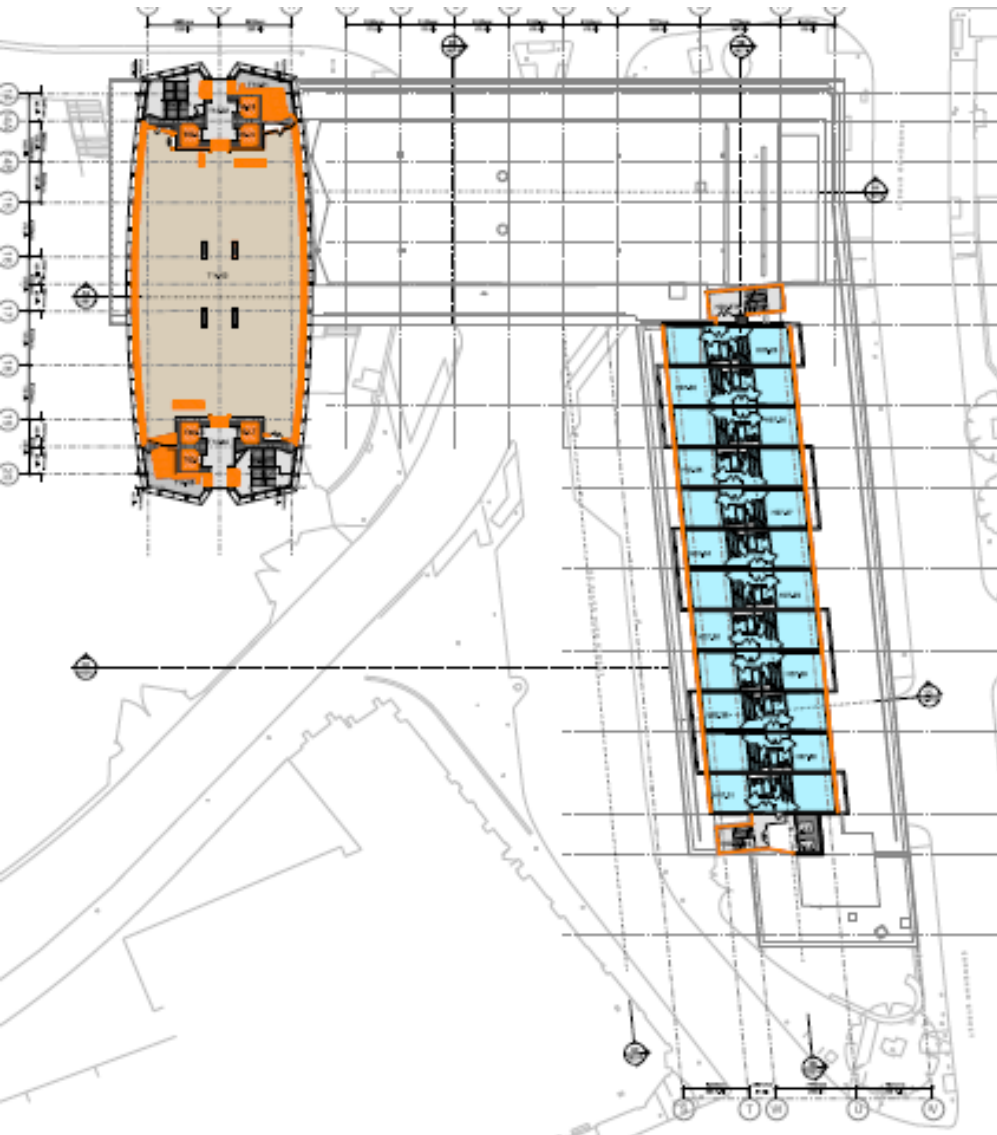
Existing seventh floor plan



Proposed seventh floor plan



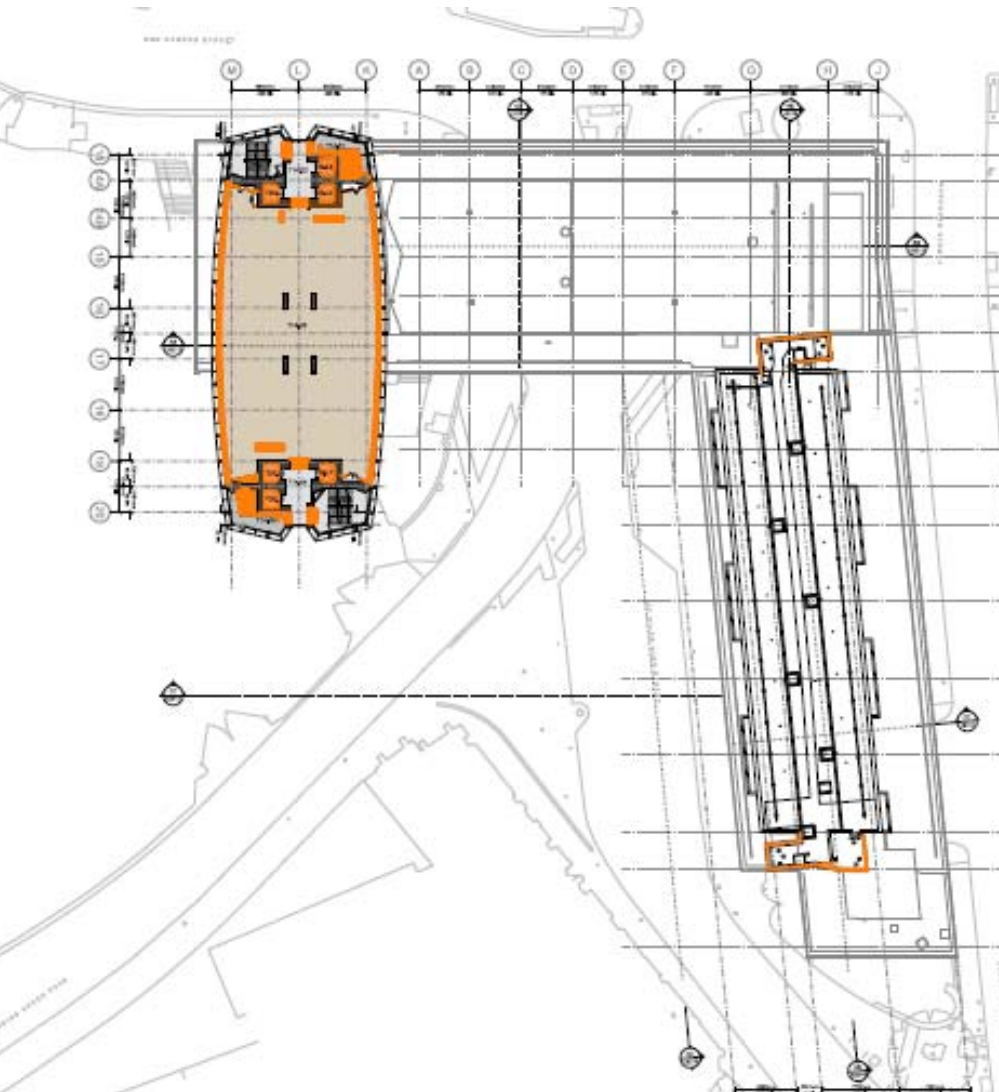
Existing eighth floor plan



Proposed eighth floor plan



Existing ninth floor plan
and Centre Point House roof plan



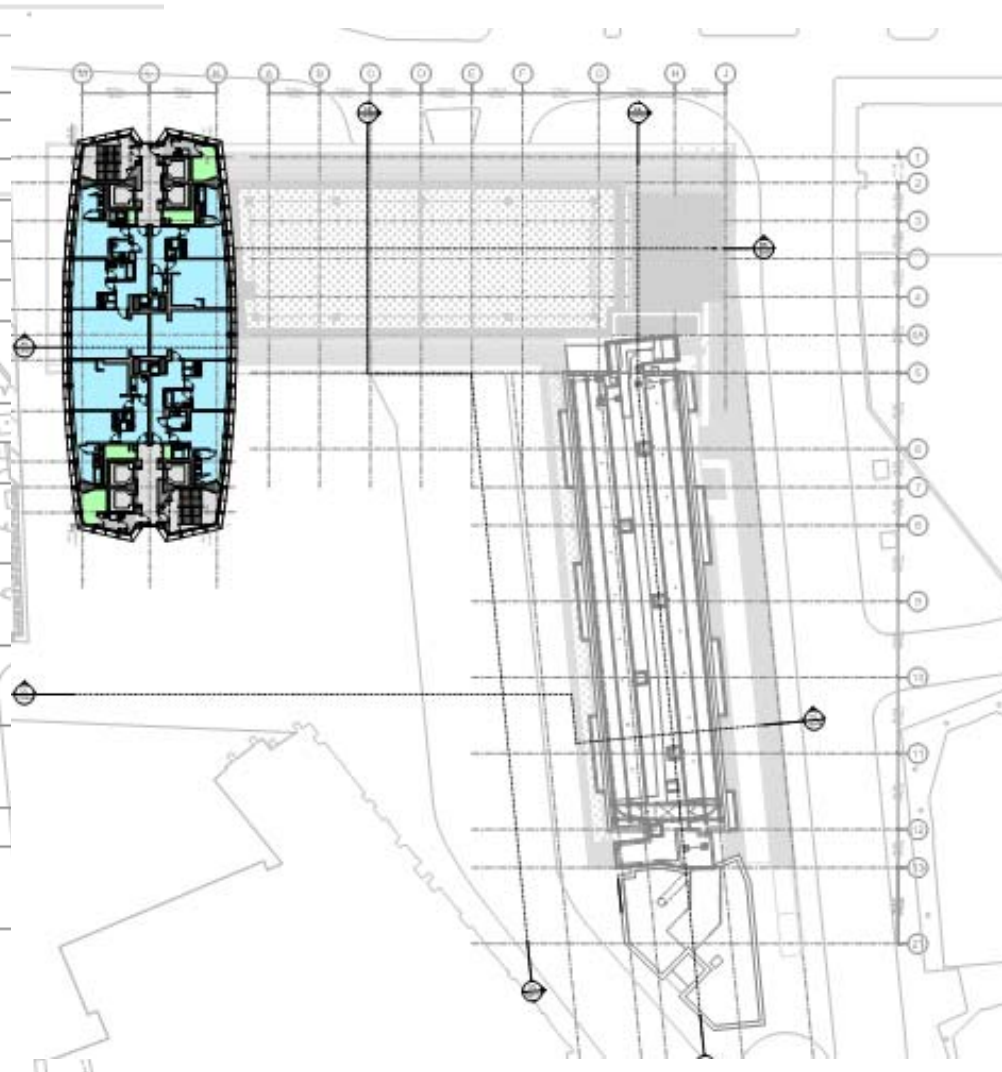
Existing ninth floor plan
and Centre Point House roof plan



Typical existing floor plan to tower



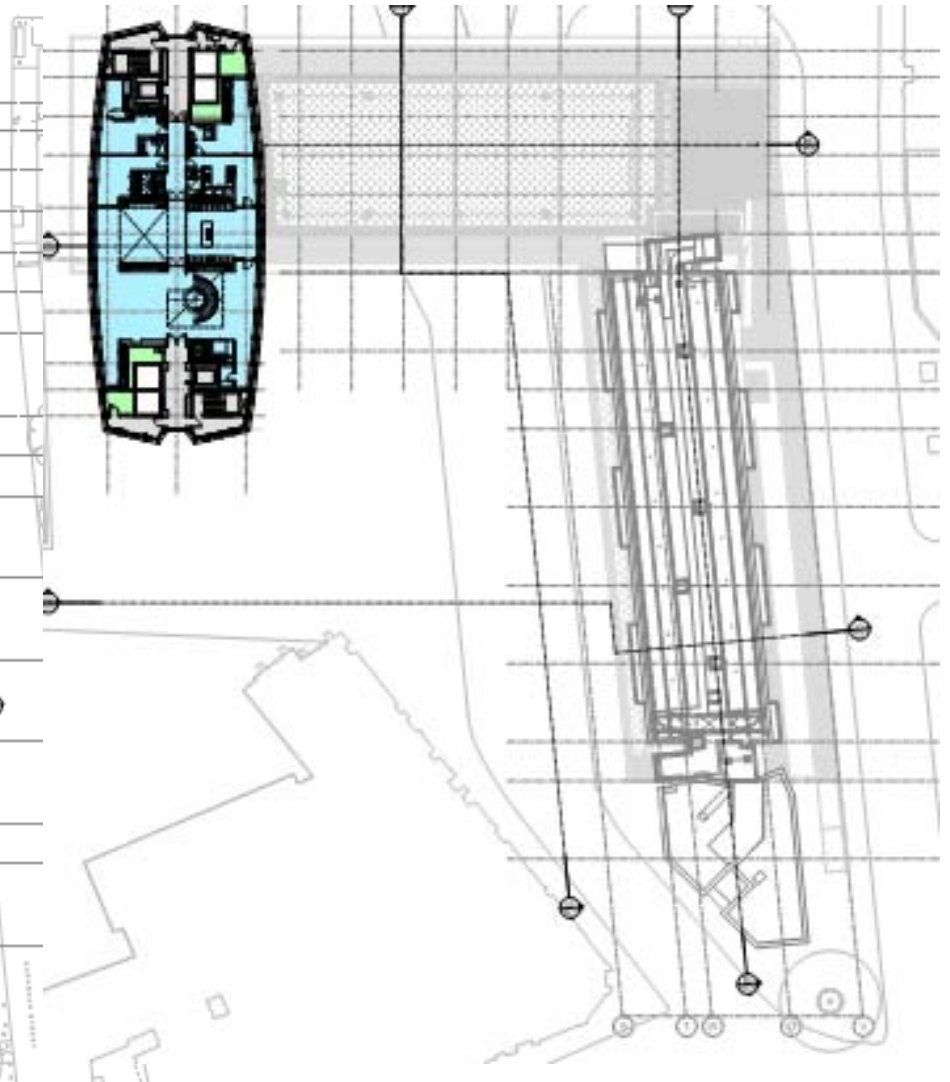
Typical proposed floor plan to tower



Existing thirty third floor plan



Proposed thirty third floor plan



Existing west elevation - tower



Existing west elevation – Centre Point House



Existing east elevation – Centre Point Tower and House



Existing south elevation – Centre Point Tower and House



Existing south elevation – Centre Point House and bridge link



Existing north elevation – Centre Point tower and House and bridge link



Proposed west elevation – tower



Proposed west elevation – Centre Point House



St Giles Church

proposed east elevation – Centre Point Tower and House



Proposed section through Centre Point House and Intrepid Fox development



Centre Point House

New block

Proposed south elevation – Centre Point Tower and House



Proposed south elevation – Centre Point House



Proposed south elevation – bridge link



Proposed north elevation – Centre Point tower and House and bridge link



Existing view from New Oxford Street



Proposed view from New Oxford Street



Existing view from St Giles Churchyard



Proposed view from St Giles Churchyard



Proposed view from St Giles High Street



Existing view from Denmark Street



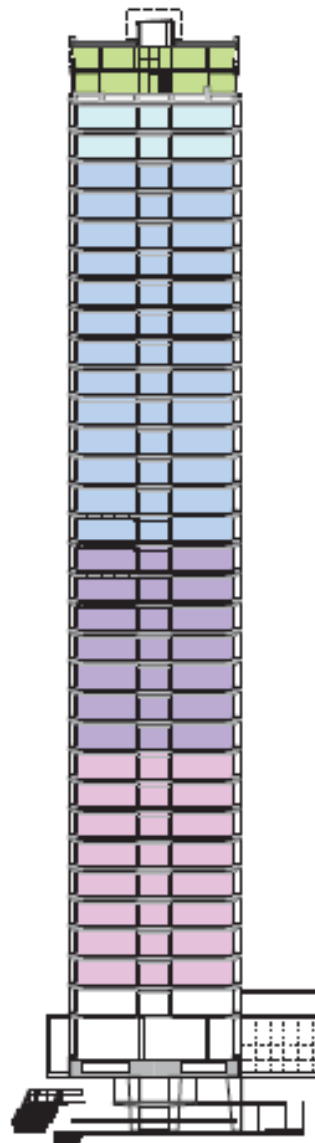
Proposed view from Denmark Street



Proposed ground floor detail



Proposed unit sizes in Centre Point Tower



Duplex floors 33-34



Floors 31-32



Floors 18-30



Floors 11-17



Floors 3-10