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FAO Jonathan McClue

17 February 2017

Our ref: HJWB/WRI/AKG/J6350

Your ref: PP-05544009

Dear Jonathan,

**Centre Point (includes Centre Point Tower, Centre Point Link and Centre Point House), 101 and 103 New Oxford Street and 5-24 St Giles High Street, London, WC1A 1DD
Minor Material Amendment Application – Approved Scheme Amendments**

On behalf of our client, Almacantar (Centre Point) Limited, we enclose an application relating to proposed amendments to the approved planning permission at Centre Point (2013/1957/P) which was granted on the 1 April 2014.

Background

Planning permission was granted on the 1 April 2014 (2013/1957/P) for the following development:-

"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."

Following the grant of planning permission (and listed building consent) the Applicant has undertaken detailed design work which has resulted in some minor changes to the configuration of the plant equipment at roof level at White Lion House.

White Lion House (WLH) is the affordable housing block located on the southwest of the site. When built, WLH will provide LB Camden with 13 affordable housing units (8 x one bedroom, 3 x three bedroom and 2 x four bedroom).

The reasons for the proposed reconfiguration of the roof plant equipment at White Lion House are:

- Design development of attenuators;
- Fans positioned to accommodate attenuators and facilitate personnel access to roof for maintenance and roof cleaning;
- Simplification of extract system and limited space availability for routing tumble dryer ductwork relating to the existing Centre Point House residents' laundry facilities; and
- Smoke extracts required as part of the Fire Strategy, to be operated in emergency circumstances.

Pre-Application

Following detailed pre-application correspondence with planning officers at LB Camden, the amendments represented in this application are considered to be material to planning permission ref: 2013/1957/P and thus the proposals have been submitted under a Section 73 application.

Proposals

This application seeks permission to Vary Condition 2 of planning permission ref: 2013/1957/P, dated 1 April 2014 in order to reflect minor material amendments to the configuration of the roof plant equipment at White Lion House.

Rationale

This application seeks permission for the reconfiguration of the roof plant at White Lion House. This has changed from what was originally permitted following detailed design point throughout its construction.

The design rationale for the amendment to the plant is twofold: 1) attenuation and 2) access.

- 1) Attenuation – after detailed evaluation of the acoustic performance of the area and the plant arrangement, it was found that further acoustic mitigation is required in order to be certain that the external acoustic criteria set by LB Camden would be met. After extensive review the mitigation in this case was only feasible in the form of ducted attenuation. Options for relocation within the building or adjacent roof areas were considered but rejected due to more detrimental impact on the elevations.
- 2) Access – there is a need for the safe access for maintenance to switches, fans and Air Handling Units (AHUs). There is also a need for the safe access to the perimeter of the roof, rainwater outlets and the safe access to the vertical elevations of the buildings.

The decision to reconfigure the plant on the roof of WLH was taken as it is not possible to relocate the rooftop plant at a subterranean level, or within the approved building form, due to limited space constraints as the areas are congested due to a limited basement footprint which is filled by existing UKPowerNetworks Substations, Life Safety Plant and the residential bicycle store.

There is no space for any additional plant on any other floor as the floorspace has already been maximised in planning to accommodate the maximum number of affordable housing units into the

building envelope. The addition of any plant within the building would therefore result in the reduction or loss of affordable housing units provided within the permitted scheme.

Furthermore, the function of the plant is to extract smoke from the building, the location of which has already been approved and would not be practical to locate elsewhere.

Views

The importance of the roofscape is recognised. The enclosures are roofed in order to improve views from above. To mitigate the impact of the attenuation, the plant has been redesigned so that the combined tumble dryer fan and ventilation shaft fan have been relocated within the building.

A prioritised parameter for the design has been to minimise the height of the roof top plant enclosure. The same amount of enclosure is proposed as the approved scheme but due to the lengths of the attenuation the plant cannot be further reduced to fit inside the enclosure. All of the installation has been kept within the minimum height possible. By locating the units on the roof of WLH the duct routes are both kept to a minimum height and are concealed from views at street level as they are set back behind the adjacent roof parapets and are in line with the geometry of the building.

Design

The reconfiguration of the roof plant has led to a revision of the layout and sizes of mechanical plant; increase in plant height between 150mm and 280mm (150mm from highest point in approved); this change is required to provide adequate smoke extraction in the event of fire, while staying within the acoustic requirements for the plant.

The intent was previously to hide some of the plant in the enclosure however this has not been possible due to its height. Therefore, the louvred upstand is proposed to be split in two and reduced in size. Low level ducting is proposed which will fall outside the enclosure. This will not result in a change to the height or finish.

It is considered that the revised layout will provide better maintenance and escape access to and from the roof, with a single route and two points of escape. The proposals presented in this application are considered to be the optimum solution based on available footprint, maintaining plant access and simplifying services routes to risers. The arrangement positions the plant so that it relates to the primary geometry of the building (the grids). It is considered that the rearrangement of the concrete paviours and the pebbles (ballasts) helps the arrangement to appear less haphazard. The architects, RMA, have sought to consolidate the perceived clutter on the roof and mechanical engineers have confirmed that their proposal is optimised for compactness. One of the priorities of the design was to minimise the plant levels and enclosures. All enclosures are the minimum height possible and less than the ideal minimum head clearance of 2 metres. The 3D views, prepared by RMA, submitted with this application, demonstrate that the impact is negligible.

In conclusion, the proposed roof plant reconfiguration results in the plant becoming more spread across the roof, the overall layout is considered to be less bulky due to the reduction to the louvred upstand.

Screening

Both the louvred screens proposed will be fully enclosed.

Plant Specification

Information provided as part of this minor material amendment application, prepared by FlaktWoods, Fire Design Solutions and Nuarie Limited, demonstrate and describe the proposed plant specification in detail.

Acoustics

After detailed evaluation of the acoustic performance of the area and the plant arrangement, further acoustic mitigation was required in order to be certain that the external acoustic criteria set by LB Camden would be met. Following extensive review, the mitigation in this case was only feasible in the form of ducted attenuation. Options for relocation within the building or adjacent roof areas were considered but rejected due to more detrimental impact on the elevations.

Sound attenuation in ducts is primarily a factor of the length of duct. The project team have developed the mechanical engineering design to minimise the size of the ducts. The length of the ducts cannot be further reduced without reducing the acoustic performance and the ability to meet Camden's acoustic requirements. All rooftop ventilation plant has been designed with suitable attenuation which is in compliance with LB Camden's noise criteria requirements.

The 'Acoustic Report', prepared by Sandy Brown, submitted in support of the minor material amendment application concludes that the predicted noise levels from the proposed fans and attenuators are compatible for achieving the overall plant noise limits for the development set out by LB Camden, with allowance for contribution from other plant items.

Daylight/Sunlight

The applicant has also consulted daylight and sunlight specialists GIA on the impact of the revised proposals on the daylight and sunlight to the residential accommodation within the Centre Point scheme and any surrounding residential accommodation. Given the modest alterations in terms of bulk and mass it is the opinion of GIA that it is very unlikely that the proposals would result in any material or noticeable change in daylight or sunlight to the adjoining residential accommodation. Accordingly, we have submitted a letter from GIA, dated 19 October 2016, which confirms this position.

Heritage Considerations

The proposed amendments have been conceived in the context of seeking to enhance the significance of the building in accordance with the approved scheme proposals.

The amendments are deemed to build upon the beneficial works of the consented scheme. It is considered that the proposed amendments are consistent with those that have already been approved and represent a sensitive and appropriate suite of works that will not detract from the character and appearance of the Denmark Street Conservation area. It is also considered that the proposals will not harm either public or private views within the Denmark Street Conservation area.

Therefore, it is considered that the proposals meet the tests of Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Enclosed Drawings

The schedule of plans approved as part of planning permission 2013/1957/P, and plans submitted as part of this application to substitute them, are outlined in the table below. Only drawings that have been amended are enclosed as part of this application submission.

Name	Approved Reference Number	Proposed Reference Number
Proposed Ninth Floor Plan	522-19413-CPA_PL2	522-19413-CPA_PL3
Proposed West CPT Elevation	522-19501-CPA_PL2	522-19501-CPA_PL3
Proposed North New Oxford Street Elevation	522-19502-CPA_PL2	522-19502-CPA_PL3
Proposed East C.P.H (Earnshaw Street) Elevation	522-19503-CPA_PL3	522-19503-CPA_PL4
Proposed South Elevation	522-19504-CPA_PL2	522-19504-CPA_PL3
Proposed West CPH Elevation	522-19505-CPA_PL3	522-19505-CPA_PL4
Section DD	522-19510-CPA_PL2	522-19510-CPA_PL3

Application Documentation

Accordingly, we enclose the following information for your approval:

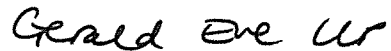
- Completed application form;
- Community Infrastructure Levy form;
- As approved plan, section and elevation drawings, prepared by Rick Mather Architects, dated 15 September 2014;
- As proposed plan, section and elevation drawings, prepared by Rick Mather Architects, dated 10 February 2017;
- Approved and revised layout sketch, prepared by Rick Mather Architects, dated 19 August 2016;
- Zoomed in approved and proposed plan drawings ref: 552-19673-CPW_PL1 and 600-19673-CPW_PL1;
- Approved and proposed elevation drawings ref: 552-19880-CPW-PL1 and 600-19880-CPW-PL1;
- Supplementary Report, prepared by Rick Mather Architects, dated 10 February 2017;
- Plant Specification information, prepared by FlaktWoods, Fire Design Solutions and Nuarie Limited;
- Updated Acoustic Report, prepared by Sandy Brown, dated 28 September 2016; and
- Daylight and Sunlight letter, prepared by GIA, dated 19 October 2016.

The application has been made electronically via the planning portal (reference: PP-05544009).

The requisite application fee of £195 has been paid by BACS transfer.

Please do not hesitate to contact Will Rimell or Anna Gargan of this office should you have any questions regarding this minor material amendment application. We look forward to receiving notice of your receipt and validation of this application.

Yours faithfully



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