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04 April 2017

Our ref: GO/ANE/RLG/J7623A

FAO: David Glasgow

Dear Sir/Madam

Castlewood House (77-91) and Medius House (63-69) New Oxford Street, London Amendments to Application Ref. 2017/0618/P

We write on behalf of our client, Royal London Mutual Insurance Society, to submit amendments to planning application reference 2017/0618/P relating to the proposed phased development at Castlewood House (77-91) and Medius House (63-69), New Oxford Street, London.

The proposed works include:

"Demolition of existing office building at Castlewood House (Class B1), and erection of an 11 storey office building (Class B1) with retail and restaurant uses (Class A1/A3) at ground floor level; enlargement of existing double basement level and formation of roof terraces and rooftop plant along with associated highways, landscaping, and public realm improvement works. Partial demolition of Medius House with retention of the existing façade, and erection of a two storey roof extension including private roof terrace, in connection with the change of use of the building from office (Class B1) and retail (Class A1) to provide 20 affordable housing units (Class C3) at upper floor levels with retained retail use at ground floor level".

Prior to submission the application was presented to the Design Panel, Chair Review on the 20th of January 2017. Following a positive review the planning application was submitted and made valid on 1st of February 2017.

Since submission the applicant has continued to engage and liaise closely with Camden Planning Officers and specifically have held meetings with the following:

David Glasgow

Planning Officer

Edward Jarvis

Urban Design Officer

Alfie Stroud

Design & Conservation Officer

Carolyn Whittaker

Housing Development Officer

To date a number of consultation comments from local residents and amenity groups have been received, including:

- The Bloomsbury Association;
- · Covent Garden Community Association; and
- South Bloomsbury Tenants & Residence Association.

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In response to both the Design Review and consultation comments the applicant has made several amendments to the proposed scheme. These amendments have been discussed and agreed with the relevant Camden Planning Officers.

In the context of the above, the following documents have been submitted to support the amendments to the scheme.

- Covering letter (this document);
- Application forms;
- · CIL forms; and
- Updated and amended proposed plans, elevations and sections.

The amendments are discussed in further detail below.

Design Amendments

A number of design elements relating to Castlewood House and Medius House have been incorporated followings comments from the Chair Review, local residents and amenity groups. Design amendments have been reviewed and agreed with Camden Design and Conservation Area Officers.

Castlewood House design amendments include:

Reconfiguration of roof plant

Following comments on behalf of the Bloomsbury Association, South Bloomsbury Tenant Association, Camden Design and Conservation Officers, and local residents the applicant has sought to reduce the area on the roof for the provision of plant equipment.

The applicant has carefully considered the reconfiguration of roof plant to reduce its visibility in townscape views and visual/amenity impact on Matilda apartments. The tallest element of the plant room has been reduced to a single strip running east to west along the roof. The section of plant to the south will be reduced to 3m and will be open to air (no longer double stacked). The southern elevation of the plant room has also been set back slightly further than previously, in response to comments by Matilda Apartments. A total of 93sqm NIA office is provided within a 3.8m high pavilion to the north (+11 sqm from submitted layout).

The alterations significantly reduce the visibility of the roof top in local townscape views (as defined within the submitted Visual Impact Assessment).

Eastern Flank

Comments on behalf of the Bloomsbury Association, South Bloomsbury Tenant Association, Camden Design and Conservation Officers, have expressed concern regard the impact of the proposals on the neighbouring locally listed Toni & Guy building.

In order to enhance the relationship between the proposed buildings and the Toni & Guy building a number of design amendments have been proposed. In respect of Castlewood House, the eastern gable wall adjacent to Toni & Guy has been decorated with a simple motif to add more visual interest to what was previously considered to be a blank flank wall. The precast panel has been pulled forward to sit flush against the surrounding frame.



South West Cut Back

In response to comments from the Design Review Panel and Camden Design & Conservation Officers, the south west corner of Castlewood House has been cut back, at ground and first floor, to provide a greater amount of public realm on Earnshaw Street; improve views through to Central St Giles', and increase pedestrian permeability. The amendments result in a small reduction in retail and office floorspace provision.

Courtyard Space in Front of Toni and Guy

Camden Design & Conservation Officers questioned whether the outlook of the existing Toni & Guy window, at ground floor, should be enhanced. It was suggested it could be altered to look into public realm within the pedestrian arcade.

In response to these comments, an extension of useable courtyard space has been created in front of Toni & Guy window in the pedestrian arcade to allow an improved outlook and additional light to windows. It is considered that this amendment will enhance the experience of people moving through the passageway.

Medius House design amendments include:

Stair Tower and Lift Overrun Massing

The Design Review and Camden Design and Conservation Officers expressed concern centred on the massing and articulation of the stair tower to the south west of Medius House.

A design response has been made which breaks down the mass of the stair tower to minimise the apparent bulk when viewed from New Oxford Street. The design has evolved in such a way that only a slender red brick element is visible from street level, tested in a series of dynamic views along the pavement.

This also enhances the relationship between Medius House and Toni & Guy, responding to the comments from the Bloomsbury Association and South Bloomsbury Tenant Association.

Extension Detail and Dormer Windows

Following comments from the Camden Design and Conservation Officers the mass, design and overall dominance of the Medius House extension has been reviewed.

The revised design has amended the language of the rooftop dark brick extension to create a more articulated architectural language. The number of windows has been reduced from 10 to 6 which create a more domestic scale to the proposal. The scheme has introduced dormer windows to provide a visually interesting silhouette to the extension. Simpler and more refined lines offer a more legible and confident articulation to the dormer windows.

Level 5 and 6

Following comments from the Camden Design and Conservation Officers, minor amendments to the proportions of level 5 & 6 of the red brick extension on the New Oxford Street Elevation have been made.



Revised Unit Mix

The Borough has a strong need for family sized units (3 bed or more units), particularly those within the Social-Affordable tenure. In line with this priority, and in response to feedback provided by the Camden Housing and Department, the number of family sized units has been increased.

In the Social-Affordable tenure, a total of 10 units will be provided. This includes 4 x 1 Beds, 1 x 2 Bed (Wheelchair Accessible) and an increased number of 3 beds, with a total of 5, representing 50% of the total floor space for this tenure.

The Intermediate Rented mix has remained unchanged with a total of 8 units. The mix includes a 4 \times Studios and 4 \times 2 bed (4 person) units.

The overall number of affordable units being provided across both tenures has slightly decreased from 20 to 18 units (and the description of development will need to be amended accordingly). However, it is important to note that the total floor space apportioned to both the overall affordable housing offer and to each tenure has remained the same.

The revised affordable housing offer has been agreed with the Camden Housing Officer and represents a balanced and mix provision taking into account housing mix priorities within Camden Development Policy DP5 and Emerging Local Plan Policy H6.

Independent Retail Provision

A number of consultation responses received have emphasised a desire to secure the provision of small, independent retail units, such as the South Bloomsbury Tenants and Residents Association, Bloomsbury Association and Camden's Economic Development Officer.

It is noted that Camden Development Policy DP10 and Emerging Local Plan Policy TC5 encourage the provision of small shops premises within schemes involving over 1,000sqm of retail (such as the scheme) however it is only expected when the threshold of 5,000sqm retail is reached.

However, the applicant has taken these comments on board and proposes to designate area of at least 75sqm specifically for the provision of small and independent units, which could be located on in the south east corner on Bucknall Street.

Cycle Provision

In response to comments from TfL, the applicant has sought to increase the provision of cycle parking within the scheme. An additional ten long-stay cycle parking spaces are accommodated within the basement. This has increased the total provision of cycle parking to 295 spaces, comprising 279 long-stay spaces and 16 short-stay spaces.

Conclusions

The amendments proposed are in direct response to Design Review comments and consultation responses received on the submitted application which have been discussed in detail with Camden Planning Officers.

This scheme offers a considerable number of benefits to this part of Camden. In particular:



- Regeneration and transformation of the existing area;
- Provision of 18 much needed affordable homes (over 100% of Camden's affordable housing requirement);
- Provision of new active public uses at ground and lower ground floor levels to reactivate
 the street frontage with a mix of A1 and A3 uses such as shops, galleries, cafes and
 restaurants:
- Allocation of an area of at least 75sqm for small independent retail units:
- **High quality and attractive design**, which embraces the surrounding context of the conservation area;
- Improvement to the surrounding public realm, creating a new and improved destination which is visually attractive and legible; and
- Provision of 295 cycle spaces for commercial occupiers, residential occupiers and visitors to the buildings.

In this context it is considered that the development will make a significant contribution to both Camden and to London.

We trust that Officers have everything required to determine the application and would now encourage London Borough of Camden Planning Officers to take this planning application to the next available Development Control Committee.

In the meantime, should you have any queries or questions, please do not hesitate to contact Graham Oliver or Alex Neal of this office.

Yours faithfully

Gerald Eve LLP

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