

006.ES/P17-1505  
12<sup>th</sup> December 2017

David Peres Da Costa  
Development Management, Regeneration and Planning  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

Dear David,

**Re: Planning and Listed Building Consent for internal and external alterations at 118-132 New Oxford Street, West End, LONDON WC1A 1HL – Revised applications including 3no. ATMs**

I write in relation to the above site following the recent approval of planning, listed building and advertisement applications on behalf of Lloyds Banking Group.

This application focuses on the provision of 3no. ATMs on the external elevations of the building. Please note we have separately submitted revised planning and listed building consent applications for minor changes to the refurbishment works only, and does not include the 2no. ATMs on Tottenham Court Road.

The reintroduction of 2no. ATMs on the Tottenham Court Road frontage is the only difference between this planning and listed building consent application and that which has been submitted under separate cover. However, this application also includes those minor changes which have been identified following the strip out works and form part of the separate application.

- Application Forms
  - Planning Application Form (Planning Portal reference **PP-06604118**)
  - Listed Building Consent Form (Planning Portal reference **PP-06604124**)
- CIL Additional Information; and
- Plans and Drawings
  - 50941725-AR01-00-1000 Site Location Plan
  - 50941725-AREX-E1-0201-Existing Main Elevations PL
  - 50941725-AREX-00-0001-Ground Floor Existing PL
  - 50941725-AREX-00-0021-Ground Floor-Demolition-Removals PL
  - 50941725-AR01-00-0201-Ground Floor Internal Ele Sht 1 PL
  - 50941725-AR01-00-0202-Ground Floor Internal Ele Sht 2 PL
  - 50941725-AR01-00-0602-Ground Floor Finishes-Walls PL
  - 50941725-AR01-00-0603-Ground Floor Finishes-Skirtings PL

- 50941725-AR01-00-0801-Ground Floor Proposed RCP PL
- 50941725-AREX-B1-0001-Basement Floor Existing PL
- 50941725-AREX-B1-0021-Basement Floor-Demolition-Removals PL
- 50941725-AR01-BM-0201-Basement Floor Internal Ele Sht 1 PL
- 50941725-AR01-BM-0202-Basement Floor Internal Ele Sht 2 PL
- 50941725-AR01-B1-0602-Basement Floor Finishes-Walls PL
- 50941725-AR01-B1-0603-Basement Floor Finishes-Skirtings PL
- 50941725-AR01-B1-0801-Basement Floor Proposed RCP PL
- 50941725-AREX-01-0001-First Floor Existing PL
- 50941725-AREX-01-0021-First Floor-Demolition-Removals-PL
- 50941725-AR01-01-0201-First Floor Internal Ele Sht 1 PL
- 50941725-AR01-01-0202-First Floor Internal Ele Sht 2 PL
- 50941725-AR01-01-0204-First Floor Internal Ele Sht 4 PL
- 50941725-AR01-01-0602-First Floor Finishes-Walls PL
- 50941725-AR01-01-0603-First Floor Finishes-Skirtings PL
- 50941725-AR01-01-0801-First Floor Proposed RCP PL
- 50941725-AR01-00-0600-Finishes Schedule WIP

#### Revised Plans

- 50941725-AR03-E1-0202-Proposed Main Elevations
- 50941725-AR03-00-0001-Ground Floor Proposed PL
- 50941725-AR03-00-0601-Ground Floor Finishes-Floors
- 50941725-AR03-B1-0001-Basement Floor Proposed
- 50941725-AR03-B1-0601-Basement Floor Finishes – Floors
- 50941725-AR03-01-0001-First Floor Proposed
- 50941725-AR03-01-0601-First Floor Finishes – Floors

#### Additional plans

- 50941725-AR02-S1-0501-Typical shopfront section
- 50941725-AR02-S1-0502-Typical Entrance section
- 50941725-AR03-00-1003-External Plan
- 50941725-AR03-E1-0201-Proposed Part Elevation-New glazing

A cheque to cover the planning application fee of £195.00 has been forwarded to the Council under separate cover.

The Design and Access Statement and Heritage Statements which accompany the submission are provided in subsequent sections of this letter.

#### Revised Proposals – inclusion of 2no. ATMs on Tottenham Court Road

The application proposals are identical to those for the application submitted under separate cover, with the exception of 2no. ATMs proposed on the external elevation fronting Tottenham Court Road.

Two ATMs in this position originally formed part of the previous planning and listed building consent applications on the site, and no objections were raised to the inclusion of the ATMs by the Design Out Crime or Conservation Officers.

Concerns were raised by Transport Officers in relation to the proximity of the ATMs to the Tottenham Court Road underground station entrance which stands in the footway adjoining the site, and the potential for queues to form at the ATMs and affect pedestrian flows in this location. The 2no. ATMs on Tottenham Court Road were withdrawn from the scheme to enable the applications to be approved and further discussions to take place regarding the ATMs.

Given that the footway is over 17.5m in this location and the distance between the ATM and the tube entrance, it is not considered that queues would adversely affect pedestrian safety or movements in this area.

Notwithstanding this, a revised arrangement is proposed with the ATMs recessed 900mm into the shopfront, thereby providing an increased separation distance of almost 5m between the tube station entrance and the ATM.

Initial discussions have taken place with Transport who confirmed they would not be able to comment on the acceptability of the arrangement until they have confirmation that the positioning of the ATMs is acceptable in design terms. Reference was made to guidance provided by TFL and has been considered as part of the proposals.

Pre-application discussions have taken place with the Design Out Crime Officer who has confirmed the acceptability of the revised arrangement and that this has addressed any previous concerns in terms of pedestrian movements in this area. Further comments of the Transport Officers have been sought, but no response has been received prior to submitting the application.

Given that no confirmation has yet been received from Transport Officers on the acceptability of the 2no. ATMs on Tottenham Court Road, these have been isolated from the separate planning and listed building consent applications to ensure that any delays in resolving this matter do not hold up progress on construction of consented and revised works to the listed building, which have been identified as being required following initial strip out works. An assessment of the impact of the 2no. ATMs on Tottenham Court Road is provided below.

### Impact of the ATMs on Tottenham Court Road

The Pedestrian Comfort Guidance for London document has been reviewed which provides guidance on recommended minimum footway distances. For High Flow scenarios, the recommended minimum footway distance in the guidance is 5.3m. The guidance states that *"this is enough space for comfortable movement of up to 2,000 pph and a large piece of street furniture such as a wayfinding sign, a bench,*

*a bus shelter or a busy pedestrian crossing. If there is no street furniture, the width can be reduced to 3.3m. This is enough space for comfortable movement up to 2,000 pph."*

The guidance sets out that queues around the ATM can reduce the clear footway width by between 1.5m-3m of space depending on the area and number of machines available. The proposals would provide 2no. ATMs on this elevation, a further ATM on the New Oxford Street frontage and several ATMs within the building. Given the availability of a number of ATMs within the immediate vicinity of the site, a 1.5m buffer would provide over 3.4m clear footway which is the same or greater than existing footway distances in the immediate vicinity of the site as shown on the external distances plan which accompanies the application.

It should also be noted that the building is proposed to be open to the public at the following times.

Mon – Fri 08.00 – 20.00

Sat 08.00 – 18.00

Sun 11.00 – 17.00

A number of ATMs will therefore be available within the building at peak pedestrian times including from 8am to 6pm on Saturdays. Accordingly, the availability of other ATMs in the immediate vicinity of the building will prevent any queuing in the footway.

The total width of the footway in this location is around 17.5m which is significantly greater than the 5.3m set out in the guidance, even with a 3m obstruction presented by the underground entrance. It is also noted that the guidance provides typical minimum distances where the effect of street furniture has the potential for pedestrians to be forced into the highway. It is demonstrated that there will be no issues in terms of queuing at the ATMs. However, if in unforeseen circumstances there was an issue at this location, the effect would be that pedestrians would divert around the tube entrance and the effect would not be that pedestrians would be forced into the highway, as the case would be on a typical footway. Any effect of the development would have no adverse effect on highway or pedestrian safety. Paragraph 32 of the NPPF confirms that '*Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe*'.

Pre-application discussions have also taken place with the Design Out Crime Officer who has confirmed the acceptability of the revised arrangement and that they are satisfied that any impact on pedestrian flows has been addressed in crime

prevention terms. Given the above, there will be no adverse impact on highway or pedestrian safety and the effects of the development cannot be described as severe.

The provision of external ATMs is critical to the viability of the proposed development in this location and the proposals comprise a considerable investment into the historic building which will provide significant benefits to the character of the building and the wider area. The above confirms that there will be no adverse impact on pedestrian safety and therefore would comply with National and Local policy and guidance.

### Heritage Statement

The site is a Grade II Listed Building located within the Bloomsbury Conservation Area. A Heritage Assessment was provided with the original application providing an assessment of the significance of the heritage assets and demonstrating the acceptability of the proposals against relevant planning policy.

It was confirmed that the application proposals, which included the proposed ATMs, represent an acceptable and appropriate form of development when considered against the special historic and architectural interest of the Grade II Listed Building. They would also serve to enhance the character and appearance of the Bloomsbury Conservation Area and the setting of the other Listed Building within the vicinity of the application site.

The revised application proposals constitute minor variations to the consented scheme and would contribute to the wider refurbishment of the Grade II listed building. Variations to the scheme have been introduced to take account of any elements of significance identified during the strip out of modern elements of the building.

Notwithstanding the considerable importance and weight attributed to the presumption in favour of preservation of the architectural and historic interest of the Listed Building and the character and appearance of the Conservation Area, the variation to the consented proposals can and should be supported.

### Design and Access Statement

#### *Access*

The site is centrally located within the Bloomsbury Conservation Area. The location of the site is highly sustainable and accessible by public transport including underground, bus and by walking.

The entrance to the building is located at ground level, with a power assisted glazed entrance to provide suitable disabled access. No changes are proposed to the access arrangements from those consented under the recent approvals on the site.

### *Layout*

The Layout of the site also remains as previously consented under the recently approved planning application. Some minor changes are proposed to the internal arrangement of the building to meet the operational requirements of the end user. These internal works do not require planning permission and would not adversely affect the historic character of the building in building conservation terms.

The ATM consented on the corner of Bainbridge Street and New Oxford Street is proposed to be repositioned slightly to be positioned on New Oxford Street. The change would not be significantly different from the consented location and the Designing Out Crime Officer has been consulted and confirmed this revised location is preferable in terms of crime prevention.

### *Scale*

The scale of the building and its features are not proposed to be affected by the proposed development.

### *Appearance*

External alterations will be limited to the shopfront at ground floor level and this will not affect any elements of historic value. The only change to the external appearance from the approved application is the slight repositioning of the consented ATM on the corner of Bainbridge Street and New Oxford Street and the introduction of shutters to the main entrance.

### *Landscaping*

The site is located within the built-up area in central London, located on the street frontages of New Oxford Street and Tottenham Court Road. The extent and nature of the application site does not present any opportunities to provide landscaping within the proposals.

### Summary

In summary, the proposals represent a highly sustainable form of development which will support the Government's commitment to create jobs and prosperity and support economic growth.

The proposals will result in a significant level of investment which will support the local economy and the sustainable reuse and refurbishment of a listed building to provide a flagship branch for an established bank.

The revised proposals bring about minor changes from the consented works under recent approvals on the site and enable the restoration and refurbishment of historic

elements which have been discovered during strip out works. The proposals incorporate sensitive design considerations which respect the historic character of the building and the wider conservation area. Detailed consideration has also been given to public safety and crime prevention measures. It is demonstrated that the 2no. ATMs on Tottenham Court Road are acceptable in design terms and would have no adverse impact on pedestrian safety and would not create conditions which are susceptible to crime.

The proposals are demonstrated to comply with relevant policies of the Camden Local Plan and the National Planning Policy Framework and therefore, the Planning Listed Building and Advertisement Consent applications should be approved.

Yours sincerely



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