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Mr Gideon Whittingham
Planning Department
London Borough of Camden
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14 March 2018

KH/LW – 16/544
VIA EMAIL

Dear Mr Whittingham,

135-149 SHAFTESBURY AVENUE, LONDON WC2H 8AH

PLANNING APPLICATION REFERENCE: 2017/7051/P

LISTED BUILDING CONSENT REFERENCE: 2018/0037/L

We write on behalf of our client, Capital Start Limited ('the Applicant'), to formally submit revisions to the application for full planning permission and listed building consent at 135-149 Shaftesbury Avenue, London WC2H 8AH (LPA refs. 2017/7051/P and 2018/0037/L).

The application was submitted to the Council on 22 December 2017 and comprises the refurbishment of the existing Grade II listed building and a new two storey roof extension and new basement level to provide a new four-screen cinema, a 94-bedroom luxury hotel, ground floor restaurant and bar space, a roof level bar and a pool area within the lower basement level. The overarching aim of the proposed development is to secure the long-term commercially viable future of the building, which is current in a state of disrepair.

Following the submission of the application, a number of comments have been received from statutory consultees, as well as Camden Council's Independent Design Review Panel (DRP), who provided their formal comments on 16 February 2018 following a meeting on 2 February 2018.

The purpose of this letter is to summarise the subsequent design modifications to the submitted scheme that address the comments from the DRP and statutory consultees in full.

This letter should be read in conjunction with the following documents that are submitted as part of this package of revisions:

- Amended Design and Access Statement, prepared by Jestico + Whiles;
- Amended Proposed Drawings and Drawing Issue Register, prepared by Jestico + Whiles;
and
- Operational Management Plan, prepared by Iceni Projects.

Summary of Amendments

The proposed amendments to the development proposals are a direct response to the feedback that has been received during the statutory consultation period and the DRP process and comprise:

- The materiality and design of the proposed roof extension have been altered. The design has been simplified through the use of fritted glazing as the primary material ensuring the roof extension is distinctive from the host building, providing a calm backdrop;
- The introduction of a new feature picture window on the rear elevation in the location of the bomb-damaged section of the façade to encourage outlook over Phoenix Gardens and to the street, as well as to active a façade that was considered too conservative;
- The introduction of new feature windows at ground floor level on the Stacey Street, New Compton Street and St Giles Passage frontages in order to create further activity and life around the perimeter of the site;
- The provision of a new dedicated cinema entrance along the Stacey Street frontage;
- The removal of the alcoves and door recesses along the New Compton Street of the façade to remove the potential for anti-social behaviour;
- Internal modifications, including:
 - The provision of an indicative restaurant layout, including the location of a kitchen and seating areas;
 - The introduction of an artwork/decorative features that will be inscribed on the inside of the front elevation to provide a historical reference to the former auditorium, reflecting its former volume in the new atrium space;
 - Rationalisation of back of house and toilet facilities, including the provision of accessible showering and change facilities, and a disabled toilet for the cinema use
 - Rationalisation of the staff cycle parking facilities at Basement Level 2, including the provision of an adaptable cycle parking space;
 - Revisions to the cinema layouts to provide wheelchair accessible spaces; and
 - The provision of further detail for the pool and spa area at Basement Level 2.

In addition to the above amendments which have been reflected on an updated drawing package and Design and Access Statement, a comprehensive Operational Management Plan has also been prepared which details the various management measures that would be implemented into the running of the development to identify potential conflicts that may arise and how these will be mitigated to ensure each use can exist harmoniously.

These amendments are described in further detail below.

Response and Additional Information

The Applicant's design team has reviewed the comments received from the following panels and consultees which have necessitated a number of design modifications to the submitted proposals:

- Camden Council's independent Design Review Panel;
- Metropolitan Police's Design Out Crime Officer;
- Camden Council's Inclusive Access Officer; and
- Camden Council's Highways Department.

These are addressed in turn.

Response to Design Review Panel Comments

Comments from the Design Review Panel were received on 16 February 2018, noting a number of suggestions to improve the design in order for the panel to consider the scheme acceptable. These comments and how the design has responded are summarised in the table below.

| DRP Comment | Response |
|--|--|
| Conservation | |
| <i>The panel sought confirmation on the extent of historical building fabric behind the current interiors.</i> | The detailed Heritage Statement accompanying the planning and listed building consent application provided a detailed analysis of the interior of the existing building. This concluded that the extent of modifications to the building over time have removed the majority of original historic building fabric, with the façade of the building the |
| <i>The panel supported the lighting and restoration of the external frieze on the building. It was suggested that an artist could be commissioned to extend the frieze along the eastern elevation to reflect the performance history of the building.</i> | The external frieze along the frontage of the building would be restored and lit as part of the proposals, with this requirement secured via planning condition. The Applicant notes the panel's suggestion to extend the frieze, however this will suggestion will not be implemented in the proposals. This is due to the other measures that are provided at ground floor level to activate the building as well as the costs implications of carrying out the work. |
| Roof Extension | |
| <i>The panel was supporting of the principle, bulk, scale and massing of the proposed roof extension.</i> | The bulk, scale and massing of the roof extension has remained unaltered. |
| <i>The panel considered the design and materiality of the roof extension to be confused, not adequately distinctive and did not have a satisfactory relationship to the building below. The panel was also not supportive of the proposed copper mesh treatment. In summary, the panel noted that they would be supportive of design that is distinctive of the existing building but suggested that more thought needs to be put in about form and expression of the roof and its relationship with the existing building below.</i> | The design of the roof extension has been altered following the receipt of the panel's comments. The design of the roof extension has now been simplified, removing the contrasting glass and copper mesh sections and replacing it with glazing that is finished with white frit. This approach ensures that the roof extension is distinctive from the host building, simple and represents a calm backdrop the materiality and form of the host building. |
| Architecture | |
| <i>The panel noted that the internal layout of the building should try and reflect the building's original design, suggesting that the former</i> | As noted above, the extent of changes over time have removed the former internal features of the theatre. However, historical images and documents have been reviewed that identified the location and layout of the auditorium. This has been used as the basis for the introduction |

| DRP Comment | Response |
|---|---|
| <p><i>location of the auditorium be reflected in the design as a historical design clue.</i></p> | <p>of an artwork/decorative feature that will be inscribed on the inside of the front elevation reflecting the volume of the former auditorium. This will allow users of the building to appreciate the scale of the old theatre and its relationship to the new volume and scale of the atrium.</p> <p>This feature is illustrated in additional graphics within the revised Design and Access Statement and through a new sectional drawing (ref. 2818-JW-147).</p> |
| <p><i>The panel suggested that the entrance arch would have originally contained a heavy bronze armature and questioned the use of glass.</i></p> | <p>The entrance arch has been revised and a bronze armature reflecting the original design has now been incorporated for this feature, in accordance with the panel's suggestion.</p> |
| <p><i>The panel considered that the proposed rear elevation was too respectful to an element of the building that wasn't designed to be seen. Opportunities to activate this elevation should be explored, particularly at ground floor level.</i></p> | <p>The rear elevation has been modified to introduce a new feature picture window in the rear elevation in the location of the bomb-damaged part of the façade (that is now fully bricked). This creates a dialogue with the lift lobby inside the building and the street and gardens below.</p> <p>Additionally, the ground floor openings have been rationalised and the introduction of a new picture window at ground floor level corresponding to the restaurant use at ground floor level is provided. This additional opening will introduce</p> |
| <p>Façade Activation</p> | |
| <p><i>The panel noted the potential to active pedestrian routes around the building and to increase pedestrian flow with new openings. Suggestions include the provision of a window on the St Giles Passage elevation to activate this frontage and the activation of the rear elevation (New Compton Street).</i></p> | <p>The ground level frontages around the site have been altered as a result of the panel's comments through the introduction of new openings. A new feature window is provided along St Giles Passage and New Compton Street to provide an active frontage on these pedestrian routes to provide views into the restaurant and bar space within.</p> <p>Additionally, a new entrance has been provided on Stacey Street that is specifically for the cinema use. This is accompanied by a new window opening on this elevation at ground floor level to further activate this frontage.</p> |
| <p><i>The panel noted that the shared cinema and hotel entrance would not be a practical design for a public cinema, giving the impression as a private screening room. It was also suggested that further work could be done to increase the cinema's external presence through signage to</i></p> | <p>A new dedicated cinema entrance has been provided on the Stacey Street frontage of the site, in addition to the main entrance. This would be accompanied by a new feature window that would provide views into the building, activating this frontage of the site.</p> |

| DRP Comment | Response |
|--|--|
| <p><i>the canopy and through the existing display features along the Shaftesbury Avenue frontage.</i></p> | <p>Signage would be provided to ensure the cinema would be visible to passers-by, with the final details provided through separate advertisement consent applications following the grant of planning permission and listed building consent.</p> |
| <p>Internal Layout</p> | |
| <p><i>The panel made a number of comments and suggestions regarding the layout and interaction of uses at ground floor level. These included:</i></p> <ul style="list-style-type: none"> • <i>More detail regarding the restaurant and bar, including the location of seating and indicative capacities</i> • <i>Opportunities to introduce new openings on all frontages of the site to encourage activity around the building associated with the internal use.</i> • <i>A suggestion that a larger void be provided between the front wall to bring in additional light.</i> | <p>The revisions to the application drawings have provided further clarity over the layout of the proposed restaurant space. The location of a kitchen and indicative seating arrangement is now provided on the ground floor plan (ref. 2818-JW-113-P02), demonstrating how this space would operate. Furthermore, an Operational Management Plan has been prepared which demonstrates how the operation of the restaurant and other uses would occur.</p> <p>As noted above, additional opening have been provided at ground floor level encouraging greater activity around the building.</p> <p>The Applicant will not be implemented the larger void space. If pursued, this would result in a reduction of hotel rooms and would jeopardise the viability and delivery of the proposals.</p> |
| <p>Future cinema use</p> | |
| <p><i>The panel raised a number of points regarding the operation of the cinema, the provision of the spa and space capacity of the cinema, noting concerns that there may not be enough space to accommodate each use within the building.</i></p> | <p>A comprehensive Operational Management Plan has been prepared which addresses these concerns from the panel. The Operational Management Plan confirms the estimated capacity of the restaurant, cinema and bar spaces and identifies the various management measures that would be implemented to ensure each use would operate efficiently.</p> <p>Additionally, the requirement for the development to deliver the new cinema use forms a planning obligation within the section 106 legal agreement, ensuring its delivery.</p> |

These various amendments are shown on the revised drawing package with updated illustrative material and diagrams provided within the amended Design and Access Statement, both of which have been prepared by Jestico + Whiles. Furthermore, the Operational Management Plan clarifies the various management approaches that shall be implemented in the proposals.

Response to Secured by Design Comments

Comments from the Metropolitan Police Service's Design Out Crime Officer identified a number of recommendations and suggestions to be implemented within the proposed development to reduce crime as well as the feel of crime. These comments can be summarised as follows:

- Removal of the door recesses on the New Compton Street elevation at ground floor level to prevent these alcove areas from continuing to be used for anti-social behaviour;
- Removal of the entrance to the cycle parking facilities on the New Compton Street elevation at ground floor level to ensure that all cycle parking facilities are accessed internally;
- Clarification over building management issues between the proposed cinema and hotel uses, to ensure safe and secure access is provided; and
- Recommendations for the installation of security rated doors, lighting and CCTV.

These recommendations suggested by the Design Out Crime Officer have been implemented in the revisions fully. Specifically:

- The alcoves and door recesses have been removed from the New Compton Street elevation at ground floor level. The introduction of a new window on this elevation at ground floor level, in response to the DRP, would also ensure a greater degree of natural surveillance to the street, reducing opportunities for criminal behaviour;
- External access to staff cycle parking facilities have been removed from the New Compton Street elevation, with access to the staff cycle parking facilities accessed internally;
- The management of the various uses within the building, including providing safe and secure access to hotel rooms and measures to control access to the lifts, is detailed within an Operational Management Plan which is submitted as part of this package of information; and
- The suggested securing rating details for doors, lighting and CCTV would all be incorporated into the proposals during the detailed design phase of the project.

Response to Inclusive Access Comments

A number of comments were provided by the Council's Inclusive Access Officer regarding accessibility features within the proposed development. These included:

- A requirement for 10% of the hotel rooms to be accessible;
- Clarification regarding accessible changing, shower and toilet facilities;
- A requirement for adaptable cycle parking;
- Provision of accessible seats within the cinema; and
- Clarification over induction loop facilities and other measures within the building.

The revisions to the proposed drawings have accommodated each of these requirements. Specifically:

- A total of 10% of rooms within the hotel are accessible;
- Accessible changing and showering facilities are provided at the basement level;

- An accessible cycle parking space is provided at Basement Level 2;
- An additional disabled toilet has been provided for the cinema;
- Each cinema is equipped with wheelchair accessible seating areas; and
- Induction loops are provided throughout the building.

Further detail on these measures are detailed within the revised Access Statement within the Design and Access Statement prepared by Jestico + Whiles.

Response to Highways Comments

In addition to the proposed servicing and delivery arrangements, Highways Officers provided comments regarding the internal staff cycle parking facilities. In summary, it was requested that:

- A total of 12 staff cycle parking spaces are provided, in addition to the 1 x additional adaptable cycle parking space requested;
- Details and dimensions of the proposed cycle parking facility are provided; and
- Further clarification provided regarding access to the cycle parking facility.

As part of undertaking the revisions to the scheme to respond to the DRP comments, the cycle parking arrangements were revised. 12 cycle parking spaces, plus space for one adaptable cycle are provided at Basement Level 2. Appropriately dimensioned plans for these cycle parking facilities, along with further detail on the type of cycle stands, are provided within the amended drawing package and Design and Access Statement.

Access to these staff cycle parking facilities would be via the dedicated service lift, which staff can access from the New Compton Street frontage of the site.

Short stay cycle parking spaces would be provided externally via Sheffield stands.

Summary

From the outset of the planning process, the Applicant has engaged with the Council, the local community and key stakeholders throughout an extensive pre-application process. This process provided targeted feedback into the design of the submitted development proposals. The proposed amendments to the development proposals are a result of continued engagement following the submission of the application and respond to the comments received from the Design Review Panel and from the statutory consultation period in full.

The Applicant is committed to the delivery of this project, with the proposals ensuring a long-term commercially viable lease of life can be given the listed building to the benefit of the building, the immediate area and the economy of the West End.

We trust that the revisions and enclosures are acceptable, but if you have any queries, or would like to discuss any aspect further, please do not hesitate to contact Kieron Hodgson or Nick Grant of this office.

Yours sincerely,

Iceni Projects Ltd.

ICENI PROJECTS LTD

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Amended Design and Access Statement, prepared by Jestico + Whiles

Amended Proposed Drawings and Drawing Issue Register, prepared by Jestico + Whiles

Operational Management Plan, prepared by IcenI Projects.