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FAO: Laura Hazelton

31 July 2020

Our ref: LJW/NDA/LLJU0010439/1

Your ref: PP-08873663

Dear Sir

**Town and Country Planning Act 1990 (As Amended)
247 Tottenham Court Road
Application for Full Planning Permission**

We write on behalf of our client, Prudential UK Real Estate Nominee 1 Limited and Prudential UK Real Estate Nominee 2 Limited (the "Applicant"), to submit an application for full planning permission in respect of development at:-

- 247 Tottenham Court Road, London, W1T 7HH;
- 3 Bayley Street, London, WC1B 3HA;
- 1 Morwell Street, London, WC1B 3AR;
- 2-3 Morwell Street, London, WC1B 3AR; and
- 4 Morwell Street, London, W1T 7QT.

These addresses comprise the application site (the "Site"). Full planning permission is sought for the following:-

"Demolition of 247 Tottenham Court Road, 3 Bayley Street, 1 Morwell Street, 2-3 Morwell Street and 4 Morwell Street and the erection of a mixed use office led development comprising ground plus five storey building for office (Class B1) use, flexible uses at ground and basement (Class A1/A2/A3/B1/D1/D2), residential (Class C3) use, basement excavation, provision of roof terraces, roof level plant equipment and enclosures, cycle parking, public realm and other associated works."

On 09 July 2020, the Applicant submitted an Environmental Impact Assessment ("EIA") Screening Request to the London Borough of Camden. On 20 July 2020, the Screening Opinion (ref. 2020/3082/P) confirmed that the Proposed Development would not require the preparation of an Environmental Statement in line with Regulation 5(5) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

On 21 July 2020, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (the “Regulations” were laid before parliament and will come into force on 01 September 2020. The Regulations revoke Parts A and D of the Town and Country Planning (Use Class Order) 1987 (as amended) from 01 September 2020.

Regulation 4 of the Regulations provides that if before 01 September 2020 an application for planning permission is submitted which refers to uses or use classes specified in the Town and Country Planning (Use Class Order) 1987 (as amended) (the “Use Classes Order”) as it applies on 31 August 2020, that application must be determined by reference to the Use Classes Order as at 31 August 2020. For the avoidance of any doubt, this application for the Proposed Development is submitted with reference to the Use Classes Order as it applies on 31 August 2020 and must therefore be determined by reference to the Use Classes Order as it applies on 31 August 2020.

The Proposed Development has been subject to extensive pre-application discussions between August 2019 and July 2020. The design team have discussed the Proposed Development at a series of pre-application meetings (ref. 2019/4361/PRE) and workshops with Officers in respect of design, land use, highways and transport, townscape and heritage, servicing and deliveries and sustainability.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

The Proposed Development presents an opportunity to replace the existing buildings which are poor quality and piecemeal; acting as a broken tooth on Tottenham Court Road and encouraging anti-social behaviour on Morwell Street. The existing buildings interact poorly with the streetscape with no level access for any uses, and limited activity on Bayley Street and Morwell Street. The existing buildings contribute to the anti-social behaviour prevalent along Morwell Street.

The Proposed Development would provide a highly sustainable new building with a mix of uses including new homes, flexible high-quality workspace, and flexible retail uses at ground floor and basement to future proof the building. Sustainability has driven the project brief, with it being clear in this case that demolition is the most sustainable option when taking into account the embodied and operational carbon impacts of retaining and refurbishing the existing structure.

The design team has engaged with Camden’s Officers over the course of the last year alongside other key consultees to inform the final design of the Proposed Development. The covid-19 pandemic has meant that community consultation did not begin as early as planned, however the Applicant is committed to continuing this engagement with local residents and businesses during the determination period and in the future.

It is considered that the Proposed Development fully complies with the development plan and meets the objectives and aspirations for Camden and the Applicant. On this basis, we consider that planning permission should be granted.

Application Enclosures

In support of this application, a full package of documents has been prepared. As agreed with Officers; we enclose the following documents:-

- Completed Application Form and Ownership Certificate A;
- Community Infrastructure Levy Additional Information Form;
- Site Location Plan, prepared by Stiff + Trevillion;
- Drawing Schedule, prepared by Stiff + Trevillion;
- Existing and proposed plans, elevations and sections, prepared by Stiff + Trevillion;
- Design and Access Statement, prepared by Stiff + Trevillion;
- Access Statement, prepared by David Bonnet Associates;
- Fire Statement, prepared by JGA;
- Town Planning Statement, prepared by Gerald Eve LLP;
- Noise Assessment, prepared by AECOM;
- Basement Impact Assessment, prepared by AKT-II
- Energy Statement, prepared by Watkins Payne Partnership;
- Sustainability Statement (including BREEAM Pre-Assessment), prepared by Watkins Payne Partnership;
- Whole Life Cycle Assessment, prepared by Hoare Lea;
- Desk Based Archaeological Assessment, prepared by Cotswolds Archaeology;
- Air Quality Assessment, prepared by AECOM;
- Daylight Sunlight Assessment, prepared by Point 2 Surveyors;
- Drainage Assessment, prepared by AKT-II;
- Townscape and Visual Impact and Heritage Assessment (including Accurate Visual Representations produced by Miller Hare), prepared by Peter Stewart Consultancy;
- Transport Assessment, prepared by Momentum;
- Framework Delivery and Servicing Plan, prepared by Momentum;
- Framework Travel Plan, prepared by Momentum;
- Draft Construction Management Plan pro-forma, prepared by Momentum;
- Statement of Community Involvement, prepared by London Communications Agency;
- Preliminary Ecology Assessment and Potential Bat Roost Assessment, prepared by Tyler Grange;
- and
- Bat Survey Report, prepared by Tyler Grange.

The application fee of £39,389.00 has been paid to the London Borough of Camden via the Planning Portal. The application fee has been calculated on the basis that the development creates eight new dwellings and 10,697 sqm of new non-residential gross external floorspace.

We trust that the information submitted in support of this application is sufficient to ensure validation and we look forward to confirmation of this shortly.

If you have any questions in the meantime, please contact Natalie Davies (0207 333 6371), or Liam Lawson Jones (020 3486 3605) of the above office.

Yours faithfully,

Gerald Eve LLP

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