

STATEMENT OF COMMUNITY INVOLVEMENT

LONDON COMMUNICATIONS AGENCY

247 TOTTENHAM COURT ROAD

JULY 2020



This document summarises the consultation activities undertaken in relation to redevelopment proposals for the 247 Tottenham Court Road site in the London Borough of Camden.

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SECTION 1: INTRODUCTION

1.1 This Statement of Community Involvement (SCI) has been prepared by London Communications Agency (LCA) on behalf of Prudential UK Real Estate Nominee 1 Limited and Prudential UK Real Estate Nominee 2 Limited (hereafter known as 'the Applicant') to accompany a full planning application to be submitted to the London Borough of Camden (LBC) for the redevelopment of the site currently occupied by 247 Tottenham Court Road, 3 Bayley Street, 1 Morwell Street, 2-3 Morwell Street and 4 Morwell Street (hereafter know as 'the site' or 'the 247 Tottenham Court Road site').

1.2 The application is for the following proposed development:

“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.”

1.3 Full details of the proposals are found in the Design and Access Statement, Planning Statement, and other documents submitted as part of the application.

1.4 This SCI has been prepared to assist LBC in its determination of the planning application and concludes that an inclusive and responsive approach to public consultation has been undertaken as part of the preparation of the proposed scheme. It covers the pre-application public consultation undertaken between Monday 22 June and Tuesday 28 July and summarises the consultation approach, the key findings and outcomes.

Existing building descriptions and surroundings

1.5 The site, which comprises five buildings, is bordered by Bayley Street to the north and Morwell Street to the east and 248/250 Tottenham Court Road, a small building which separates it from One Bedford Avenue, to the south.

1.6 The site is situated in the Bloomsbury ward of LBC. The site is not in a conservation area; however, it abuts the Bloomsbury Conservation Area and the Charlotte Street Conservation Area is located to the north-west of the site. There are no listed buildings within the site's boundary.

1.7 The site is serviced by excellent public transport connections and is within a short walking distance to Tottenham Court Road and Goodge Street stations. It is categorised as having a Public Transport Accessibility Level of 6B, the highest possible rating.

1.8 The site is located towards the south of Tottenham Court Road, which is characterised by larger scale, modern buildings. Smaller scale, brick period buildings are found towards the centre of this route, with larger scale, modern buildings found further north of Tottenham Court Road. There is no common theme in the existing materiality along Tottenham Court Road, with larger buildings more likely to have a similar aesthetic.

The proposals and the consultation process

1.9 The description of the development is listed above (Section 1.2). The Applicant's ambition for the proposals for a mixed-use office, retail and residential building seek to deliver:

1. An adaptable and future proofed building designed for long-life use to allow for alternative uses in the future.
2. A sustainable clean and low energy building that is designed to the highest environmental standards.
3. Improved residential accommodation with new high quality and sustainable homes built to modern space standards, all enjoying their own private amenity.
4. New and improved quality flexible retail space and enlivened frontages.
5. An enlivened street frontage on Morwell Street.
6. Level access to all uses within the building.
7. A roof terrace and new biodiversity, providing habitat for flora and fauna.
8. High quality, flexible office space and amenity for workers including end of trip facilities for cyclists.
9. A car free development, making best use of the site's excellent transport connections.
10. A pocket park fronting the entrance of the office on Bayley Street.
11. Public planting along the southern edge of Bayley Street to complement the wider West End Project.

1.10 The Applicant made a commitment to consult with local communities in the lead up to the submission of the application and will continue to maintain open lines of communication with them throughout the project's lifetime, as and when required.

1.11 The consultation activities that have taken place are in accordance with LBC's own Statement of Community Involvement in Planning (July 2016) and also reflect the principles for consultation in the Localism Act (2011) and in the National Planning Policy Framework (2018).

1.12 This document fulfils the requirement laid out in the Council's own Statement of Community Involvement in Planning for the submission of a report which details:

"Where pre-application consultation is carried out, applicants should prepare a report summarising the type of consultation carried out, the key issues raised and how the scheme addresses these issues." (*LBC's Statement of Community Involvement, 3.11, p18.*)

1.13 All consultation activities outlined in this document were undertaken by the Applicant and a core team which includes architects Stiff + Trevillion (S+T), planning consultants Gerald Eve, transport consultants Momentum, and communication consultants London Communications Agency (LCA).

SECTION 2: EXECUTIVE SUMMARY

- 2.1 The Applicant has taken an informed approach to pre-application consultation with local residents, community groups, local politicians and other stakeholders between June and July 2020, ahead of submitting a planning application to LBC.
- 2.2 Public consultation on the scheme began in June 2020, with emails and/or letters issued to the following:
- Bloomsbury Ward Councillors
 - The Bloomsbury Association
 - Bloomsbury Conservation Area Advisory Committee
 - Bloomsbury Residents' Action Group
 - Save Bloomsbury
 - Fitzrovia Neighbourhood Association
 - Bedford Court Mansions
 - The Architectural Association
 - Bedford Estates
 - Charlotte Street Association
 - Bee Midtown
 - Ashby Capital
 - Sotheby's Institute of Art
 - Consulate of the Turkish Republic of Northern Cyprus
 - St Giles Hotel
 - My Hotel/ My Bloomsbury
 - École Jeannine Manuel
 - The West End Project
 - The Georgian Group
 - Derwent
- 2.3 Due to the ongoing restrictions surrounding Covid-19 and the incumbent Public Health England advice which states that individuals should look to limit contact with others and stay at home as much as possible, LBC outlined that any programmes for consultation should not include any public events for the foreseeable future. As such, the decision was made to proactively offer stakeholders a virtual briefing on the proposals with the project team, using a preferred means of technology. It was agreed that consultees would be offered the same courtesy if such a request were made, therefore eliminating the need for face-to-face meetings, bringing people into contact with one another unnecessarily whilst a risk to public health remains.
- 2.4 A public consultation website launched on Monday 22 June, remaining open for comment for five weeks until Tuesday 28 July. The consultation website – www.247TottenhamCourtRoad.co.uk - provided a downloadable link to a consultation pack, a standalone document which took consultees through the proposals, presenting the designs for office space, retail and residential alongside key design features. Further information was provided on the existing site, its condition, current uses, and wider context on the surrounding area. This consultation pack also provided background on the project team and a section which outlined the options for the Tottenham Court Road façade, noting that ongoing conversations were being held with officers at LBC.
- 2.5 The online consultation was widely advertised through a flyer drop which was hand delivered to approximately 1,998 residential and commercial premises in the local area. This covered a radius agreed with the wider project team, to ensure all the relevant local stakeholders were made aware of and provided with opportunities to comment on the proposals. Of these, 1,390 addresses were residential and 608 were businesses. In conjunction with the newsletter, an advertisement was

placed in the print edition of the Camden New Journal, published Tuesday 2 July. The Camden New Journal is a prominent local publication, which reports on local issues across the Borough. An advertisement was placed in this paper, as it extensively covers news stories in the Bloomsbury and Fitzrovia areas.

2.6 It was made clear across all supporting online and promotional materials that consultees could contact the project team via the consultation email address or Freephone in order to leave their feedback, request a meeting with the wider project team or ask for printed materials to be issued in the post. The Freephone service was referenced at length, to ensure stakeholders without internet access were also informed about the proposals and able to provide any comments they might have on the plans. Furthermore, an online form was also provided on the website for consultees to leave their feedback on the proposals presented.

2.7 Virtual meetings were organised with local stakeholders during the Pre-Application period, with briefings and feedback sessions held with the following:

- Bloomsbury Association;
- Fitzrovia Neighbourhood Association;
- Charlotte Street Association;
- Bedford Court Mansions; and
- Bedford Estates.

2.8 Not all stakeholders took the project team up on their offer to organise a virtual briefing session. Virtual correspondence took place on the proposals between the Charlotte Street Association, Bloomsbury Conservation Area Advisory Committee and a Bloomsbury Ward Councillor.

2.9 The consultation process found that consultees mainly decided to provide their feedback through email, with verbal feedback collated during stakeholder meeting sessions. Consultees appeared receptive towards the proposals, with specific questions raised around demolition, construction management, traffic, demand for office space, residential quantum and design, materials, façade design, sustainability, parking, impact on Bedford Square, public realm, timescales, height, wider context and the design brief.

2.10 Four consultees, including the ward councillor Cllr Adam Harrison (Labour, Bloomsbury), provided feedback via email and verbal feedback was collated by the project team during the virtual stakeholder briefings. The consultation website – www.247TottenhamCourtRoad.co.uk – was visited by 99 separate users, some of whom visited the site on more than one instance, resulting in a total of 130 visits.

2.11 The Applicant sought to respond to all questions raised during the consultation process, either during the stakeholder briefing sessions or via email. The Applicant's responses to the issues raised are contained in Section 8 of this report.

2.12 The Applicant is committed to ongoing consultation with the local community and will continue to engage with local stakeholders, businesses, residents and other interested parties following the submission of a planning application.

SECTION 3: CONSULTATION OBJECTIVES AND STRATEGY

3.1 In accordance with the guidelines of LBC's Statement of Community Involvement, the applicant has undertaken a consultation programme that adhered to the following principles: -

- Promote the use of electronic methods of consultation including email and the Council's website to make involvement easier, quicker and more cost effective;
- Be open about the constraints imposed by regulations and already agreed policy;
- Be realistic about the opportunities for change in any consultation;
- Give feedback to comments made in consultation;
- Be clear and helpful in guiding people through the planning process;
- Be transparent in the way planning decisions are carried out;
- Be inclusive in consultation so that a good range of views of those who live and work in the Borough are obtained;
- Use consultation methods that are appropriate to the stage of the planning process, the issues being considered and the community involved; and
- Seek views at the earliest possible stages and throughout the planning process. (*LBC SCI, paragraph 2.3-2.4, p6.*)

3.2 A consultation strategy was therefore developed to meet these objectives. It was based on:

- **Local stakeholder engagement, including:**
 - Emails and/or letters to ward councillors, businesses and community groups;
 - Publicity of the online consultation process via hand delivered flyer distribution and local advertisement;
 - Proactive offering of virtual briefings and feedback sessions to various local stakeholders;
 - A five-week consultation window with standalone materials hosted on a website alongside various feedback mechanisms; and
 - An ongoing stakeholder engagement process ahead of submission.
- **Effective promotion for the public consultation (details of which are mentioned in paragraph 2.5), including:**
 - Advert in The Camden New Journal (online and print);
 - Emails and/or letters to key stakeholders, businesses, community groups and local councillors; and
 - Hand delivery of 1,998 flyers to addresses around the site.
- **Producing consultation materials, including:**
 - Standalone consultation pack;
 - Consultation website; and
 - Online feedback form.
- **Gathering feedback via:**
 - Giving verbal feedback to the project team during virtual briefing sessions with local stakeholders;
 - Completing the online feedback form;

- A consultation email address – 247TottenhamCourtRoad@londoncommunications.co.uk; and
- A consultation phonenumber – 0800 307 7548.

- **Responding to consultees on consultation outcomes:**
 - Verbal responses to questions and concerns raised by consultees during the consultation period;
 - Written responses to questions and concerns raised by consultees during the consultation period; and
 - Consultees offered the chance to attend a virtual briefing and direct discussions with the project team.

- **A supporting stakeholder engagement plan:**
 - Offers to engage with identified local stakeholders and ward councillors via virtual briefing sessions; and
 - Ongoing correspondence with identified local stakeholders and ward councillors.

3.3 Sections 5-6 detail the consultation activity, publicity process and materials produced. Full copies of all materials are provided in the appendices.

SECTION 4: CONSULTATION ACTIVITY

4.1 A mapping and research exercise, which involved desktop-based research and engagement with key stakeholders, was carried out to establish the community and resident groups, local stakeholders and other bodies who would be interested in or affected by the proposed development. This was an evolving list, with further updates made following conversations with local stakeholders.

4.2 The list of stakeholders engaged with during the consultation process is as follows:

Bloomsbury Ward Councillors

- Cllr Sabrina Francis
- Cllr Adam Harrison
- Cllr Rishi Madlani

Community groups and businesses

- The Bloomsbury Association
- Bloomsbury Conservation Area Advisory Committee
- Bloomsbury Residents' Action Group (BRAG)
- Save Bloomsbury (blog)
- Fitzrovia Neighbourhood Association
- Bedford Court Mansions
- The Architectural Association
- Bedford Estates (Exemplar and Ashby Capital)
- Charlotte Street Association
- Bee Midtown (local BID)
- Ashby Capital
- Sotheby's Institute of Art
- Consulate of the Turkish Republic of Northern Cyprus
- St Giles Hotel
- My Hotel/ My Bloomsbury
- École Jeannine Manuel
- The West End Project
- The Georgian Group
- Derwent

Site neighbours

- Circa 1,998 local addresses (see appendix)

4.3 Nine pre-application consultation meetings have taken place with LBC in relation to the proposals, between August 2019 and July 2020. Please note that the Applicant was on hand to present the proposals on most occasions and members of the project team were also present where needed.

SECTION 5: PUBLICITY AND FEEDBACK MECHANISMS

5.1 Over the course of the pre-application consultation period, the Applicant launched and publicised a consultation website. It was decided that public consultation would be conducted virtually to ensure that local stakeholders and consultees had an opportunity to view the proposals and speak to members of the project team in advance of an application being submitted. It was noted across all materials that consultees could reach out to the project team via the feedback mechanisms listed.

5.2 Due to the ongoing restrictions surrounding Covid-19 and the incumbent Public Health England advice which stated that individuals should look to limit contact with others and stay at home as much as possible, the decision was made to offer stakeholders a virtual briefing with the project team on the proposals using a preferred means of technology. It was agreed that consultees would be offered the same courtesy if such a request were made, therefore eliminating the need for face-to-face meetings, bringing people into contact with one another unnecessarily whilst a risk to public health remains.

Consultation duration

5.3 It was determined that the public consultation would be open for comment between Monday 22 June and Tuesday 28 July. Providing a four-week period for feedback on the proposals is in line with best practise, as it ensures that consultees would be provided with an adequate amount of time to view the plans, provide feedback and be granted an opportunity to speak with members of the project team if requested.

Promoting and publicising the events

5.4 A broad variety of channels were employed to promote the public exhibition to maximise engagement with local communities. These included:

Introductory email and/ or letter

5.5 Having mapped out and identified the key local stakeholders and residents, an Excel database was created to track and record the applicant's engagement with consultees. This was used as a basis to inform different audiences about the online consultation process via correspondence which included:

- In June, an introductory email and/ or personalised letter (see appendix) was issued to ward councillors, businesses and community groups and the Bee Midtown BID to inform them of the proposals, including an offer to virtually meet.
- Follow-up correspondence, including a link to the consultation website, was issued, reiterating a commitment to meet. This mail out took into consideration additional stakeholders identified through the consultation process.

Consultation flyers

5.6 A hand delivered door drop of 1,998 addresses was commissioned to coincide with the first day of online consultation on Tuesday 30 June. Of these addresses, 1,390 were designated as residential and 608 were business (please see the appendix for the distribution area and flyer).

5.7 The flyer introduced the proposals for the site and included information about the Applicant and the composition of the various buildings across the site. It also included details for how to learn more about the proposals and provide feedback, including further context around the Covid-19 restrictions in place and the consultation response. The promotional materials outlined that

consultation content could be requested by post for those unable to view them online. An email address, website and Freephone number were also provided.

Online advertising and media coverage

5.8 The Applicant placed an advert about the consultation in the Camden New Journal (see appendix) on Thursday 2 July 2020. The Camden New Journal is a local paper, covering community news, sports and events across the London Borough of Camden. The advert appeared in the print and online edition of the publication.

5.9 This media exposure was designed to raise awareness of the consultation and to encourage a variety of age ranges in the local community to come and see the proposals, ask questions and express their views.

Consultation website

5.10 Details of the proposals were uploaded to a dedicated consultation website - www.247TottenhamCourtRoad.co.uk (see appendix) - providing information on the proposals, the duration of the online consultation and a downloadable PDF copy of the consultation pack. The webpage identified the various feedback mechanisms, including the consultation email address, an online comments section and Freephone number. This meant that people were able to review information about the proposals, request a virtual briefing and provide their views and comments through various channels, despite the current restrictions in place which limits the opportunity for face-to-face meetings. The website was publicised on all promotional materials.

Feedback mechanisms

5.11 To enable as many people as possible to comment on the proposals, a range of feedback mechanisms were developed:

- A dedicated email address – 247TottenhamCourtRoad@londoncommunications.co.uk - was set up and operational during the consultation period and widely publicised on the advertisement, flyer and the website. This encouraged dialogue and allowed interested parties to pose questions or request meetings with the project team.
- A Freephone number was provided across all materials in order for consultees to provide feedback verbally or raise further questions.
- A online comments section was included on the consultation website – www.247TottenhamCourtRoad.co.uk - for further feedback to be provided.

SECTION 6: PUBLIC CONSULTATION: CONTENT AND MATERIALS

6.1 The aim of the consultation pack was to serve as a standalone document to showcase the proposals for the site and to receive feedback from the local community.

6.2 The proposals were presented across 12 landscaped pages to support the consultation and explain the proposals. The consultation pack, which was available on the consultation website or available by post, was written in clear, plain English and made good use of images, photography, diagrams and computer-generated images.

6.3 The content of the consultation material is summarised below (see appendix for shown materials):

BOARD	TITLE	CONTENT/DETAILS
1.	Welcome	Introduced the team and the proposals for the 247 Tottenham Court Road site with context on consultation in the time of Covid-19.
2 & 3.	The existing buildings	Information on the location of the site and detail on the buildings included within the red line Boundary. Supporting imagery providing visual content on the site buildings.
4.	Site and context	History on the evolution of Tottenham Court Road, location of nearby Conservation Areas and wider design context.
5 & 6.	The opportunity	Current condition of various buildings across the site and associated images. Details on how the proposals could provide improvements in sustainability, greening, residential accommodation, retail, level access, office space, active street frontages and travel.
7, 8, 9 & 10.	The proposals	The design brief taking into consideration Tottenham Court Road, Bayley Street, Morwell Street and Bedford Square, underpinning the rational of location of office, residential and retail and design. Use of images to underpin the proposals. Images of façade design, highlighting Tottenham Court Road elevations and variety in colour considerations and brick façade element for Morwell Street. Sections, and supporting imagery, provided on retail, residential, office and materials.
11.	Sustainability and whole-life carbon approach	Information provided on the sustainable design and the principles of development.
12.	Benefits to community and next steps	List of scheme benefits, details on next steps for consultation and list of feedback mechanisms.

SECTION 7: CONSULTATION FEEDBACK

- 7.1 Four consultees, including ward councillor Cllr Adam Harrison (Labour, Bloomsbury), provided feedback via email and verbal responses were collated by the project team during virtual stakeholder briefings, with written feedback provided following. The consultation website – www.247TottenhamCourtRoad.co.uk – was visited by 99 separate users, some of whom visited the site on more than one instance, resulting in a total of 130 visits.
- 7.2 An online form provided consultees with an opportunity to provide feedback in response to the proposals. The form asked consultees to convey whether they supported the proposals, and if so, their reasons why. An open field comments section was provided for further feedback alongside a drop-down menu for consultees to identify whether they live in the area; work in the area; own a local business; or other.
- 7.3 In addition, verbal feedback was provided to the project team during virtual briefing sessions, with detailed notes taken during all meetings. A written response was also issued following one of the briefings.
- 7.4 A full breakdown of comments received during the consultation period, including written and verbal feedback, is detailed in the section below.

Summary of consultation feedback

- 7.5 Overall, all online responses to the public consultation came through the consultation email address, a summary is as follows:
- One consultee, who identified as a resident of Fitzrovia, questioned the level of demand for office and retail space in central London post Covid and considered that an increased level of residential could be integrated in the plans instead. The consultee wrote that they had no objection towards the demolition of the existing building, however asked for more clarity on the breakdown of the residential element and whether the new homes would have roof top access and what amenity was available. The affordable requirement of the new units was queried, and it was asked whether the units would be compliant with policies H2 and H4 in the Camden Local Plan and the Fitzrovia Action Area Plan. The mix of unit sizes was welcomed. On the design of the scheme, the consultee said that they found the elevations to be bland, noting that they were more reflective of development on the adjacent side of Tottenham Court Road, and that inspiration should be taken from other, more innovative commercial buildings along this route. On the materials, it was suggested that the design could be more in keeping with brick and stone colours used elsewhere, adding that the residential brick element was sensible, however that the high gloss terracotta wasn't as much in keeping with Tottenham Court Road. It was suggested that this locality is an area where imaginative and innovative design might be applied which seeks to respect and enhance the local context, rather than standing out as an isolated icon. Welcomed remarks were made around the zero-carbon nature of the proposals and the inclusion of roof top amenity space. It was noted that the basement car parking should be discontinued. The site was said to be a gateway to Bedford Square and a part of the heterogeneous architectural mix of Tottenham Court Road and it was suggested that the proposals need further revision to meet surrounding standards.
 - A further consultee welcomed the reclaiming of materials and considered that the proposals should not present any further increase in height and should echo buildings located in Bedford Square. It was noted that fenestration would be welcomed. The area mix was noted, with a comment around the need for sensitivity in this locality. It was suggested that the proposals could offer the opportunity to point towards a different mindset for developers. The variety along Tottenham Court Road was noted, leading to the recommendation that imagination and nice detailing should be included as part of the proposals which would result in a building of interest and charm.

- A number of questions were raised by a Bloomsbury Ward councillor. These have been included and answered in Section 8.

7.6 On Thursday 9 July, a call was organised with the Bloomsbury Association, Fitzrovia Neighbourhood Association and Bedford Court Mansions. Verbal feedback was taken down throughout the session, with written feedback provided in the days following. The key areas raised have been grouped and summarised below:

Sustainability

- Representatives asked for detail on how Stiff + Trevillion, signatories to Architects Declare, had sought to deliver the organisation's agenda to upgrade existing buildings for extended use as a more carbon efficient alternative to demolition and new build. It was asked what had come first, a brief for a mixed-use building or redevelopment.
- Further information on the options appraisals for redevelopment versus refurbishment were asked for. It was requested that the analysis on this be included within the Design and Access Statement.
- Comments from the Fitzrovia Association suggested that the demolition of the site was not justifiable, noting that if the buildings had been in a different location such as Clerkenwell, the existing would prove an attractive building for residential conversion. It was noted that despite the proposals being policy compliant, such direction does not keep up with environmental requirements and that more needs to be considered to respond to this content, with the provision of cycle parking and sustainable design not deemed enough to outweigh harm.

Proposed uses

- Discussion gave focus to the post Covid world, with future variables to consider. A question was raised around how the proposals would seek to respond to likely market changes, noting that the original design brief had been set pre-Pandemic.
- It was requested that the scope for subdivision of space be shown in the Design and Access Statement which could also highlight how residential and office space could be integrated in future, as the demand for larger office floorplates could be subject to change. It was also noted that the buildings at Bedford Square had proven as flexible for the last 250 years.
- The proposed corner street café on the corner of Bayley and Morwell street should consider outside seating facing onto the pocket park. There was a level of scepticism expressed around the ancillary use of the café to office.
- Comment was made towards the retail located along Tottenham Court Road, with a suggestion that the space is constrained by the internal route from the Bayley Street entrance to the lifts, resulting in inefficient, shallow units.
- The viability of D1 use was questioned at ground and lower ground floors on Morwell Street unless a pre-let could be agreed. It was noted that such a use (alongside D2) does not necessarily lead to active frontages.
- Residential access from Morwell Street was welcomed, as it was acknowledged that this will bring much needed activity to the street. The single aspect of these units was noted; however, it was outlined that they will have larger windows due to floor to ceiling heights.
- It was noted that a shared escape stair could constrain future residential use of what is currently proposed as office.
- LBC's requirement to provide an uplift in residential in mixed-use development was noted to have resulted in eight larger units of various sizes. It was acknowledged that a payment in lieu would be made due to the number of proposed homes being below the threshold for the delivery of on-site affordable.
- It was suggested that a joint venture with LBC could be considered to develop social housing onsite.
- It was asked whether any other locations had been considered for the residential element and whether Bayley Street was an option, as this would serve as a better location for residential amenity.

- It was outlined that street level servicing for uses and the location of the substation will detract from the potential for a continuous active frontage on Morwell Street. It was said that the substation should be assessed for the impact of noise emissions on neighbouring buildings.
- Further information around the location of the refuse was sought.

Anti-social behaviour

- Morwell Street was noted to be a location for ongoing anti-social behaviour, with drug use prevalent due to the lack of active ground floor uses in parts. The inclusion of active frontages was noted to be a way in which such behaviour can be designed out. It was suggested that recessed areas should be avoided as part of the scheme design, with these being areas utilised for anti-social behaviour.

Height and massing

- Questions were raised around volume and height, with remarks around the potential impact to Bedford Square, which was noted to provide a constraint on height. It was suggested that an additional viewpoint should be added along the north side of Bedford Square from the eastern footway outside 11 Bedford Square.
- The consolidation of the plant, which represents a small increase on height, was noted, with an acknowledgement that the plant had been designed with all future tenants in mind.
- The setback along Morwell Street was welcomed from what had been shown at consultation. It was noted that the street sections shown through Morwell Street were also an improvement.
- As images had not been shared in the wider street context of Tottenham Court Road, from Great Russell Street to Store Street, it was acknowledged no comment could be made on this view.
- The height of One Bedford Avenue on the Bedford Avenue frontage should not be regarded as setting a precedent.
- It was asked that the daylight and sunlight impact study be included within the Design and Access Statement.

Elevational treatment

- It was noted that the elevation along Tottenham Court Road seemed monolithic, with the proposals shown in the consultation pack bearing impact on the scale of Morwell Street. It was noted that design had since evolved to mediate this point. The monolithic appearance of the building as seen from the corner of Percy Street was noted.
- The defined roofline of Tottenham Court Road was noted, with reference to the eastern side. The question was raised as to whether the proposals had sought to incorporate and respect this context.
- Greater articulation to give more of a vertical than horizontal expression to the façade to Tottenham Court Road and even more so on Morwell Street was called for.
- The residential element should be further articulated beyond balconies. Design should incorporate for example a different materiality or colour.
- The exterior design reference to Holland House on Bury Street in the City was noted, with parallels to 4 Percy Street and 40 Beak Street made. It was suggested that this approach should be developed out further.
- It was suggested that the Tottenham Court Road streetscape could be livened up with an element of colour, in the same way that red brick and faience livens up the elevation to the block north of Bayley Street.
- The use of brick along Morwell Street should be something that is developed further.

Construction

- In line with maintaining the existing basement, it was asked whether piling works would be needed for renewed foundations. It was acknowledged that such works would take place. To mitigate disruption, it was suggested that piles should be bored rather than driven.

- It was requested that Demolition Management Plan also be submitted alongside a Construction Management Plan, with an expectation that both documents be upheld through Section 106 obligations.
- The approach presented towards the management of construction traffic from Tottenham Court Road was broadly welcomed. Any use of Bedford Avenue east and the north side of Bedford Square to access Gower Street or Bloomsbury Street would be a cause for concern.

Wider public realm context

- It was suggested that work should be done in connection with the West End Project and Ashby Capital around the delivery of pocket parks to create an improved public realm offer. Representatives noted that it would be good to see these spaces working well.
- It was suggested that the project team talk with Bedford Estates with a view to deferring the West End Project plans and applying the section 106 public open space contribution towards creating and maintaining enhanced parks with tree planting.
- It was noted that construction routes would have an impact on the delivery of pocket parks. It was suggested that a construction bond should be implemented to secure their reinstatement.
- It was noted that any integration of public art should be well consulted upon, with acknowledgement that the artwork incorporated as part of One Bedford Avenue had lacked this approach.

Consultation

- It was commented that local groups should have been engaged earlier on in the design process, as plans were notably progressed when presented. Ahead of the submission of an application, a further meeting was organised with the stakeholders, at their request.

Timescales and next steps

- The timescales for procurement were raised, with questions around the overall programme timeline. It was noted that architects be novated through the design and build process, with a question raised as to whether other consultants would be too.

7.7 On Thursday 16th July a meeting was organised with the steward of Bedford Estates. In line with government guidelines, the meeting took place virtually. Verbal feedback was taken down during the session, with a note on the main items of discussion circulated to the project team shortly thereafter. A summary of the discussion is provided below:

Consultation:

- The representative from Bedford Estates enquired if any correspondence had been made with the business operator *My Hotel*, which is situated in close proximity to the site. The project team stated several attempts to engage with the business had been made, but the owner was unresponsive.
- It was suggested the project team should try and contact the business again, and that Bedford Estates will encourage the owner to engage with the applicant. A further correspondence was subsequently sent to the establishment, although no response has been received, at the time of writing.

Construction:

- The representative from Bedford Estates enquired about the Construction Management Plan, which will be submitted alongside a future planning application. He asked for details on how vehicles are going to be accessing and leaving the site, and what impact the project team thought this would have on local roads.
- It was estimated that no more than '3 to 4' vehicles will be accessing the site at any one time, although the project team indicated these numbers could not, at this stage, be confirmed.

- The project team noted that the applicant was in advanced discussions with Transport for London to relocate and expand Santander Cycle Docking Station.

Retail and Office Space

- It was suggested that the classification use of the D1 floorspace should be changed, in the situation the area remains unoccupied over the coming months. The representative from Bedford Estates claimed that it was unlikely a lender would take up this space in the short-term.
- The project team said that the floorspace remained empty for several months, it would consider changing the use of the area with LBC.

Public realm

- The representative from Bedford Estates said the provisions to provide additional frontage and invest in new greenery along Tottenham Court Road were 'excellent.'

Anti-social Behaviour

- It was referenced that anti-social behaviour around the Morwell Street was a significant local issue. To help address the problem, the project team said they removed commercial bays, previously designated to be built along Morwell Street, from their final designs. This was in part a response to residents' concerns the provisions of commercial bays could lead to an increase in anti-social behaviour.

Residential units

- It was suggested the allocation of housing units on the site was a good design feature. The representative from Bedford Estates referenced they had previously discussed this issue with the project team and had looked at the possibility of the applicant providing offsite housing.

7.8 A follow-up meeting was arranged with representatives from Bloomsbury Association, Charlotte Street Association and Bedford Mansions. A representative from Fitzrovia Neighbourhood Association was unable to attend and sent their apologies. The main items of discussion in the meeting are summarised below:

Construction Management Plan and Traffic Movements

- It was suggested that any routes to and from the site should try and avoid Bedford Square and Bedford Avenue. The associations indicated any vehicle movements on these roads could be disruptive to businesses and residents in the area.

Retail Space

- The status of the café space at the corner of Bayley Street and Morwell Street was questioned. It was suggested this space should be accessible for both office workers using the building to which the café is adjacent and the wider public

Design

- A wider discussion took place on the materials used on the building, with specific reference being made to the different designs of the residential and office units.

Summary of all feedback

7.9 Below is a list of the key issues raised by respondents to the consultation:

- Post Covid market and flexibility
- Viability of retail along Morwell Street
- Residential breakdown

- Residential amenity
- Access
- Sustainability
- Affordable commitment on residential
- Compliancy of new homes
- Café condition
- Materials
- Wider context
- Design
- Parking and servicing
- Public realm
- Anti-social behaviour
- Additional viewpoints
- Construction and demolition
- Project timetable and submission

7.10 All of these issues have been addressed by the Applicant in Section 8. The applicant has and will continue to respond to comments raised by consultees in the following ways:

- **Meeting:** During the virtual briefings with various community organisations and stakeholders, the applicant sought to address and answer any questions they had with regard to the development and discuss any specific details of the proposals of interest to them. The applicant is open to meeting with stakeholders as the project moves forward, as and when required.
- **Email:** Consultees who asked for details on floor designs, maps of the development or other such items were sent the materials via email. The project team also provided responses via email to stakeholders over any questions they had with regard to issues such as housing, design, and use of the office space etc.
- **Freephone:** While we have not received any correspondences from consultees via the Freephone service, the applicant is committed to using this to communicate with stakeholders who do not have access to the internet and address any comments they have with regard to the proposals.
- **Construction Working Group:** In line with the policy guidelines of LBC and subject to the approval of the proposals, the applicant will liaise with a Construction Working Group (CWG) comprised of local stakeholders and community representatives, on the development of the Construction Management Plan (CMP). This will provide another platform through which the community can discuss the details of the proposals with the project team.

SECTION 8: APPLICANTS RESPONSE TO ISSUES RAISED DURING PUBLIC CONSULTATION

8.1 The table below outlines the key issues raised in Section 7 and how the Applicant has responded to these. As above, the following issues have and will be responded to in the following ways:

- **Meeting:** Some of the issues mentioned below have been discussed directly with local stakeholders during virtual briefings. The applicant welcomes the opportunity to continue meeting with consultees moving forward and discussing other details of the proposals as they progress.
- **Email:** Consultees will be provided with updates to any queries raised below via email, if they have requested to be contacted by the project team.
- **Freephone:** The applicant will get in touch with consultees who have requested a response using the Freephone service, or alternatively do not have access to the internet.
-

ISSUE	POINTS RAISED	APPLICANT RESPONSE
<p>Post Covid and market flexibility</p>	<ul style="list-style-type: none"> • Questions were raised around the changing office and retail demand post Covid. Given the flexibility proposed by the development, further information was asked for around how this could be managed within a changing market. 	<p>The building has been futureproofed by having consistent floor to ceiling heights to allow for changes of use or recycling of the façade in the future. These measures make a new building more sustainable in the whole life cycle (60 years) when compared with a refurbishment, given the conditions of the existing building have declined so significantly.</p> <p>Future flexibility will be secured through the provision of dual aspect office space and central cores.</p> <p>The retail is being applied for flexibility (Class A1/A2/A3/D2) to ensure that whatever the retail market looks like in the future that the development contributes to activity on the Tottenham Court Road frontage.</p>
	<ul style="list-style-type: none"> • One query raised questioned whether the residents' escape stairs would impact the integration of office and residential. 	<p>We have designed the proposals to be flexible and able to adapt to different future land uses, including the proposed residential stairs. We will continue to develop this strategy through the next stages of design.</p>
<p>Viability of retail along Morwell Street</p>	<ul style="list-style-type: none"> • A question was raised around the viability of the retail element (D1) along Morwell Street. It was questioned whether a pre-let could be agreed to ensure street activation. 	<p>The design of this unit would maintain a "shopfront" along Morwell Street which would ensure that activation is provided.</p>

<p>Residential breakdown</p>	<ul style="list-style-type: none"> A request was made for a further breakdown on the amount of residential. 	<p>There existing site provides six dwellings, of which four are two beds (three persons) and two are one beds (two persons). The one bed flats are smaller than current minimum space standards permit and none of the existing dwellings have any private outdoor amenity space.</p> <p>The proposals offer eight new homes incorporating a mix of dwelling types including two bed, three bed, and four bed flats delivering much needed larger units.</p> <p>All the flats will be larger than minimum space standards, all enjoying excellent levels of natural light and ventilation (with floor to ceiling windows). They will have secure enclosed cycle storage as well as secure enclosed waste storage.</p> <p>The residential building element will enjoy a dedicated entrance on Morwell street with a comfortable reception / lobby area.</p>
	<ul style="list-style-type: none"> One consultee raised whether any other locations, such as Bayley Street, had been considered for residential. 	<p>We previously explored options for the residential to be located in a linear fashion along Morwell Street, however this option resulted in compromises to the quality of the internal layouts and the potential for providing a rich mix of unit size / types. We also explored the opportunity to locate the residential above the offices (occupying the entire upper floor plates). Unfortunately, this resulted in inefficient circulation, (we explored sharing cores with other land use but this was not acceptable under building regulations / fire strategy).</p>
<p>Residential amenity</p>	<ul style="list-style-type: none"> It was asked whether the new homes would have access to the rooftop space and external amenity space. 	<p>All of the proposed housing complies with all of Camden's space standards and will have private amenity space. The rooftop terrace</p>

		will be accessible for the occupier of the B1 space.
Access	<ul style="list-style-type: none"> Will there be level access to all commercial units. 	Level access will be provided to all uses across the proposed building.
Sustainability	<ul style="list-style-type: none"> What measures have been introduced to create a sustainable project. 	<p>New, high specification plant equipment, including solar panels at roof level will minimise operational emissions of the proposed development.</p> <p>Air source heat pumps are proposed for the new design, which offers a low-carbon operation solution. The design of the façade will provide a mixed mode ventilation for when air quality on Tottenham Court Road improves to a suitable level.</p> <p>The design proposes the reuse of foundations and existing materials, where feasible. Demolition materials will be used to balance levels and for infill as appropriate.</p> <p>The proposals are for a car free development, with onsite cycle facilities provided.</p> <p>The building has been futureproofed by having consistent floor to ceiling heights to allow for changes of use or recycling of the façade in the future. These measures make a new building more sustainable in the whole life cycle (60 years) when compared with a refurbishment, given the condition of the existing buildings has declined so significantly.</p> <p>These measures have been maximised to target zero carbon, although a small shortfall to achieve this will be offset with a contribution.</p>
	<ul style="list-style-type: none"> What came first, a brief for a mixed-use development or for demolition and how does the 	A full feasibility study was carried out to assess the options. Retention of at the very least the concrete frame was the aim. However, it has proved

	<p>design respond to the direction set by Architects Declare.</p>	<p>to be unusable for modern office space, a situation that has been exacerbated by the Covid-19 outbreak and the changes to office space design that this will generate.</p>
	<ul style="list-style-type: none"> • What options appraisals for redevelopment versus refurbishment were considered. Can these be included as part of the Design and Access Statement. 	<p>Three different options appraisals were conducted which considered refurbishment with a retained façade and new M&E services, refurbishment and a replaced façade with new M&E services and proposed design which embodies a low carbon structure and energy solutions.</p> <p>The assessment concluded that the proposed design option had a significantly lower carbon footprint than a typical new build, offering a lower life carbon alternative to both refurbishment options.</p>
	<ul style="list-style-type: none"> • Which heating systems will be used in the buildings. 	<p>The plant system is all electric and there will be no gas boilers. Centralised air source heat pumps will provide heating and cooling to the building. The applicant is committed to zero carbon.</p>
Affordable commitment on new homes	<ul style="list-style-type: none"> • Further information around the affordable commitment on new homes was raised and one further question asked whether social housing could be provided through a joint venture with LBC. 	<p>The development provides the market housing on site with a payment in lieu for the affordable element in line with policy H4(f) of LBC's local plan</p> <p>Given the uplift in residential area and in line with policy, the development will make a contribution to LBC's affordable housing fund</p>
Compliance of new homes	<ul style="list-style-type: none"> • A response questioned whether the new homes would be compliant with H2 and H4 in the Camden Local Plan and the Fitzrovia Action Area Plan. 	<p>The development complies with Policy H2 and H4 of the Local plan in delivering a mix of uses on site.</p> <p>The split of commercial and residential uses meets the requirements of policy H2.</p>
Café condition	<ul style="list-style-type: none"> • The coexistence of the café and the office was questioned. 	<p>Activating this corner is of public benefit.</p>
	<ul style="list-style-type: none"> • It was suggested that the café should consider outdoor seating on the corner of Bayley and Morwell Street. 	<p>As the pavement outside of the café space is owned by LBC, the applicant will not be able to provide outdoor seating themselves.</p>

		However, any future tenants of this space will be able to apply for a license from the Council to install outdoor seating.
Materials	<ul style="list-style-type: none"> It was suggested that the Tottenham Court Road façade should be further in keeping with the surrounding brick and stonework, rather than the proposed glazed terracotta. 	This is a matter of opinion expressed by a local resident, which we will discuss with the wider project team.
	<ul style="list-style-type: none"> It was suggested that the use of brick should be further developed along Morwell Street. 	We agree and have since increased the extent of brick along Morwell Street.
	<ul style="list-style-type: none"> Tottenham Court Road and Morwell Street façades should incorporate horizontal articulation. 	This is a matter of opinion expressed by a local resident, which we will discuss with the wider project team.
	<ul style="list-style-type: none"> The residential element should be further reinforced through materiality. 	We previously tested this on the Tottenham Court Road elevation – during the Pre-App process – however it was deemed less successful than the uniform façade of consistent material as reflected in the current proposals.
Design	<ul style="list-style-type: none"> Should look to integrate imaginative design, whilst responding to the local context. Tottenham Court Road precedent should lead to detailed design. 	Information on the analysis of this is included in the DAS.
	<ul style="list-style-type: none"> How have the proposals incorporated the Tottenham Court Road roofline. 	Information on the analysis of this is included in the DAS.
	<ul style="list-style-type: none"> Further detail was requested on the location of building refuse. 	Refer to proposed ground floor plan.
	<ul style="list-style-type: none"> The building appears monolithic from Percy Street. 	We explored a number of different arrangements for turning the corner from Tottenham Court Road to Bayley Street throughout the Pre-App process. The current proposals reflect what was deemed the most successful of these options, i.e. chamfering the corner, which we felt reduced the visual impact on the corner – as viewed from Percy Street.
	<ul style="list-style-type: none"> One consultee said fenestration would be welcomed. 	Windows are incorporated in the proposals.

	<ul style="list-style-type: none"> One consultee said to further develop out design references to Holland House, Percy Street and 40 Beak Street. 	<p>We referenced Holland House because it successfully expresses verticality, features a contrasting stone plinth / base, and features glazed cladding. We included 40 Beak Street because this is an award-winning building that S+T designed that also features a distinctive glazed façade.</p>
Wider content	<ul style="list-style-type: none"> The proposals need to further respond to Tottenham Court Road and Bedford Square, bearing in mind the impact on the latter area. The impact on Bedford Square. 	<p>We explored multiple massing options via the Pre-App process with the council before arriving at the current proposed scheme.</p>
	<ul style="list-style-type: none"> There should not be an overall increase on the existing height. One consultee said that the height of One Bedford Square along Bedford Avenue should not be considered a precedent for height. 	<p>Refer to previous answer above.</p>
Parking and servicing	<ul style="list-style-type: none"> The parking within the basement should be discontinued. 	<p>The proposals for this site are for a car free development and the existing office car parking will be removed.</p> <p>All uses in the new building will be car free, making best use of the excellent local transport connections and onsite cycle storage.</p> <p>Blue Badge holders will be able to use the existing spaces along Morwell Street.</p>
	<ul style="list-style-type: none"> Where will servicing for the site be managed from and how will noise be mitigated? 	<p>All uses of the building will be serviced from Morwell Street in a new, on street loading bay. The design team have explored the potential for off street servicing but it has been ruled out because it would undermine the potential to provide activity at ground floor level and provide separate entrances for the different uses in the development.</p>
Public realm	<ul style="list-style-type: none"> The project team should coordinate with the West End Project and Ashby Capital on the delivery of public realm. 	<p>Any changes to Bayley Street will require approval from LBC. Furthermore, these works will have to be carried out by the Council.</p>

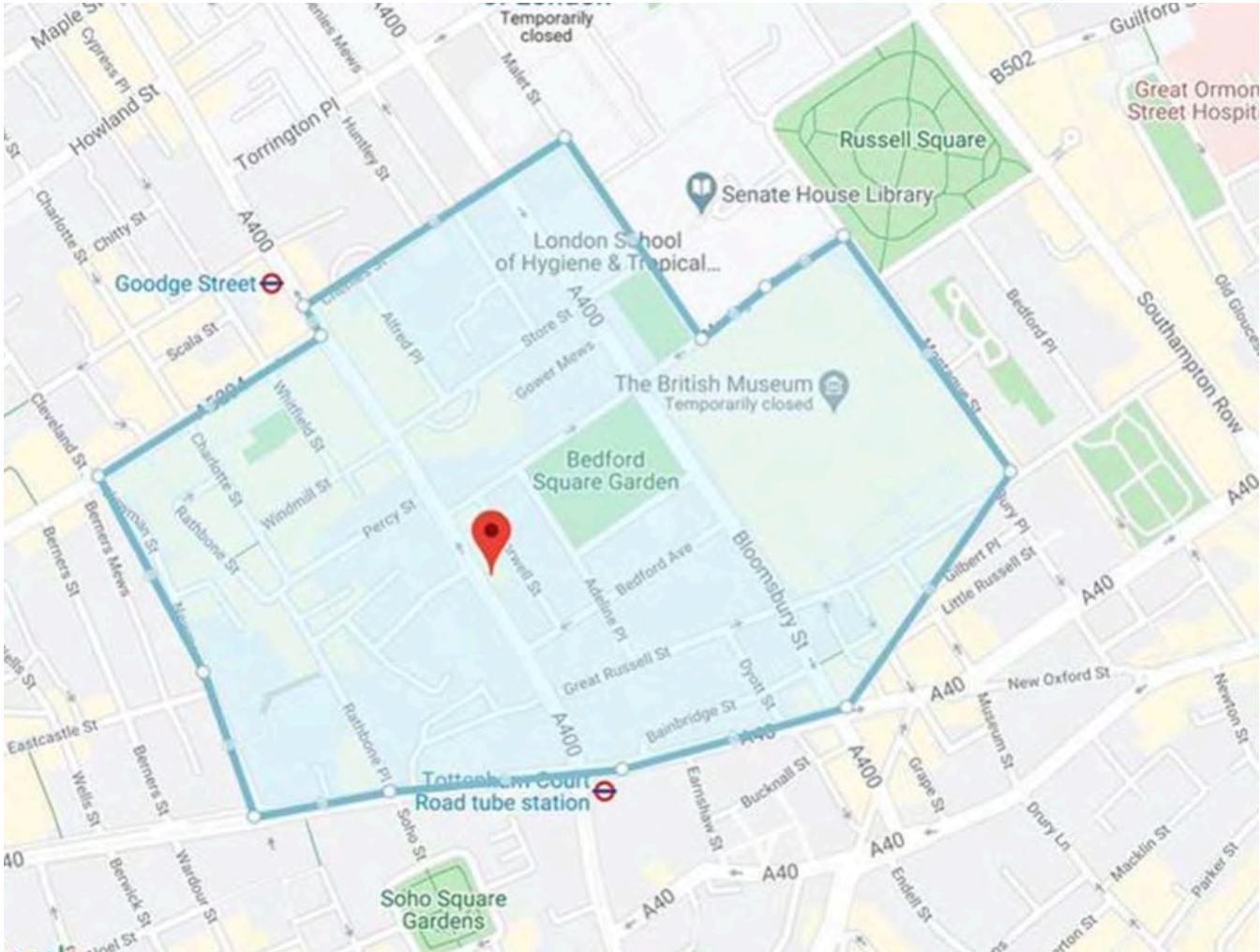
	<ul style="list-style-type: none"> It was suggested that section 106 funding could be used to create and maintain parks alongside planting in place of West End Project Plans. 	The applicant will look at the possibility to see if funds generated from the s.106 agreement can be invested in the creation of new planting and maintenance of parks in the West End Project Plans.
	<ul style="list-style-type: none"> To mitigate impact, a construction bond could be secured on the delivery of pocket parks with the West End Project. 	This is an issue which will have to be discussed between the applicant and LBC.
Anti-social behaviour	<ul style="list-style-type: none"> Design can lend itself to anti-social behaviour. Morwell Street has become an area where anti-social behaviour takes place due to inactive frontages. 	<p>Careful consideration has been given towards the design of the proposals, with Secured by Design consulted as part of design development process to improve the security of the building and the safe management of space which surrounds.</p> <p>Active ground floor uses across the site, with a residential lobby area located along Morwell Street, will help improve natural surveillance throughout the day and into the evening.</p>
Additional viewpoints	<ul style="list-style-type: none"> An additional viewpoint from the eastern footway outside 11 Bedford Square was requested. 	This will be the subject of a planning condition on the application.
Construction, demolition and noise	<ul style="list-style-type: none"> The proposed Morwell Street substation should be assessed for the impact of noise emissions on neighbouring buildings. 	Any future assessment of the Morwell Street substation will need to be agreed and discussed with LBC.
	<ul style="list-style-type: none"> Bedford Avenue east and the north side of Bedford Square should not be permitted for construction traffic. 	The Draft Construction Logistics Plan seeks to route traffic away from these streets and we expect Consultees to be part of the discussion with Camden once the application is submitted.
	<ul style="list-style-type: none"> It was suggested that piles should be bored rather than driven. 	A strategy for piling will be developed further as part of the on-going design development process. AKT II to provide further comment.
	<ul style="list-style-type: none"> Alongside the architects, would other consultants be novated through the design and build process. 	This will be discussed internally by the wider project team.
Project timetable and submission	<ul style="list-style-type: none"> Further details around the analysis which led to demolition should be included within the Design and Access Statement. 	For further details on this, please see the sustainability report submitted alongside the Design and Access Statement.

	<ul style="list-style-type: none"> Alongside a construction management plan, a demolition management plan should also be included as part of the submitted application. 	A draft report of the demolition management plan will be published, as required by the section 106 agreement.
	<ul style="list-style-type: none"> It was requested that daylight and sunlight analysis be included as part of the Design and Access Statement. 	An independent report analysing daylight and sunlight will be published.
	<ul style="list-style-type: none"> Any integration of public art as part of the proposals should be locally consulted upon. 	Any proposals for the inclusion of public art as part of this application will be shared and consulted upon with the local community.
	<ul style="list-style-type: none"> Request for further consultation. 	The Applicant will continue dialogue with local communities in the lead up and following submission.

SECTION 9: CONCLUSION

- 9.1 The Applicant has conducted a thorough consultation process with local communities, LBC, Transport for London and the Design Review Panel.
- 9.2 The consultation has aimed to fully explain the context for the proposals, present and highlight design and engage with a wide cross-section of people from community groups to resident associations, businesses and local stakeholders, whilst also considering alternate means to reach out to consultees in light of Covid-19. The Applicant has sought to consider and respond to comments and questions raised by stakeholders.
- 9.3 The Applicant has shown a commitment to engage positively with local community groups and local politicians through emails and/ or letters, the offer of virtual briefings with the project team has sought to serve in lieu of the face-to-face meetings.
- 9.4 Feedback from key stakeholders and the local community has been carefully considered throughout this process and where concerns were raised the Applicant will look to address these.
- 9.5 A total of four consultees provided responses through the consultation email address, with no calls made to the Freephone line.
- 9.6 Virtual briefings, calls and email correspondence have taken place with identified local stakeholders. The Applicant maintains a commitment towards maintaining contact following submission.
- 9.7 As detailed in Section 3 and 4, there has been a good amount of consultation activity and this has been well-publicised within the local area.
- 9.8 Through the consultation process the thoughts and views of the community and key stakeholders have been communicated directly to the project team in order to be accommodated within the design where possible.
- 9.9 The Applicant has reviewed the design narrative and has included detailed site analysis and design development narrative within the Design and Access Statement.
- 9.10 In addition, the Applicant received positive, constructive and helpful feedback on the proposals, with a mix of comments, some of which indicated a level of support towards the plans.
- 9.11 The Applicant is committed to continued stakeholder engagement to ensure local communities and key stakeholders are kept informed following the submission of this planning application.

Section 10: Appendices



Distribution area for flyer drop



SHARE YOUR THOUGHTS 247 TOTTENHAM COURT ROAD

CO-RE **M&G**
REAL ESTATE



Corner of Tottenham Court Road and Bayley Street.

M&G Real Estate, the owner of the site, and CO-RE, the development manager, are together exploring the redevelopment of 247 Tottenham Court Road.

The site, which comprises five buildings, including 247 Tottenham Court Road, 3 Bayley Street, 1 Morwell Street, 2-3 Morwell Street and 4 Morwell Street, is located in the London Borough of Camden. Situated a short walk from Tottenham Court Road Station, it is bordered by Bayley Street to the north and Morwell Street to the east and 248/250 Tottenham Court Road, a small building which separates it from One Bedford Avenue, to the south.

The existing 247 Tottenham Court Road building, which includes office space above ground floor retail, is almost 60 years old and is no longer considered to be fit for modern day working requirements. The properties along Morwell Street and Bayley Street comprise a mix of six residential units and educational facilities for the Architectural Association.

Our ambition for this site is to create a building which is designed to the highest standards providing better accessibility, more sustainable operation, and exemplary environmental standards. Where possible, we will reclaim materials from the existing buildings, responding to the principles of the circular economy.



Aerial of the site.


We would like to hear your thoughts as part of our public consultation on our plans for a new low carbon office building with retail at ground level. The proposals for 247 Tottenham Court Road incorporate a moderate increase in height, with a modern brick façade residential element replacing the six existing flats which will serve as a transition between the different scales of Morwell Street, towards Bedford Square and Tottenham Court Road.

In line with the Covid-19 restrictions currently in place, the project team, including architect Stiff + Trevillion, planning consultant Gerald Eve and community engagement specialist London Communications Agency, are working hard to reach people to ensure that local residents and businesses can have their say.

YOUR FEEDBACK

Given the Coronavirus outbreak, and following government advice, we are now providing alternative ways to ensure you have all the information you need to provide us with your feedback on how we can create the best possible proposals for 247 Tottenham Court Road. This can be done through our website which will be open for comment from **Tuesday 30 June until Tuesday 28 July** or through our consultation freephone line or email address.

Alternatively, if you have any questions, would like to request a call with the project team or a hardcopy of our consultation materials, please do get in touch with us via the channels listed below:

 **Email**
247TottenhamCourtRoad@londoncommunications.co.uk

 **Freephone**
0800 307 7548

 **Website**
www.247TottenhamCourtRoad.co.uk

Newsletter of Proposals, delivered 22.06.20

SHARE YOUR THOUGHTS 247 TOTTENHAM COURT ROAD



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Freephone

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Website

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Advertisement of proposals, which ran in Camden New Journal, 02.07.20



SHARE YOUR THOUGHTS

247 TOTTENHAM COURT ROAD

Click [here](#) to access the 247 Tottenham Court Road consultation materials.

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The existing 247 Tottenham Court Road building, which includes office space above ground floor retail, is almost 60 years old and is no longer considered to be fit for modern day working requirements. The properties along Morwell Street and Bayley Street comprise a mix of six residential units and facilities for the Architectural Association.



Corner of Tottenham Court Road and Bayley Street.

Our ambition for this site is to create a building which is designed to the highest standards providing better accessibility, more sustainable operation, and exemplary environmental standards. Where possible, we will reclaim materials from the existing buildings, responding to the principles of the circular economy.

Project website, Introduction (top of the page)



Aerial of the site.

We would like to hear your thoughts as part of our public consultation on our plans for a new low carbon office building with retail at ground level. The proposals for 247 Tottenham Court Road incorporate a moderate increase in height, with a modern brick façade residential element replacing the six existing flats which will serve as a transition between the different scales of Morwell Street, towards Bedford Square and Tottenham Court Road.

In line with the Covid-19 restrictions currently in place, the project team, including architect Stiff + Trevillion, planning consultant Gerald Eve and community engagement specialist London Communications Agency, are working hard to reach people to ensure that local residents and businesses can have their say.

Project website, Consultation (middle of the page)



YOUR FEEDBACK

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 Email: 247TottenhamCourtRoad@londoncommunications.co.uk

 Freephone: 0800 307 7548

Name

Email Address

Do you support the proposals for 247 Tottenham Court Road in principle? -

If yes, then why?

Do you have any other comments?

Why are you responding to this survey? -

I agree to be contacted about the proposals for 247 Tottenham Court Road. We will keep your information on file until the development is complete. We will not pass your details to any third party and you can be removed from the mailing email 247TottenhamCourtRoad@londoncommunications.co.uk

Please prove you are human by answering: 14 + 8 =

SUBMIT FEEDBACK

Project website, Your Feedback (end of the page)



I hope this email finds you well.

Please see attached a letter from David Hutton, the Director at CO-RE, who together with M&G Real Estate are exploring the redevelopment of 247 Tottenham Court Road. In total, the site comprises five buildings, including 247 Tottenham Court Road, 3 Bayley Street, 1 Morwell Street, 2-3 Morwell Street and 4 Morwell Street.

The team, including the architect Stiff + Trevillion, will shortly be launching a public consultation on their proposals for a new low carbon office building with retail at ground level, alongside the replacement of six existing flats. Taking into consideration the Covid-19 restrictions, we are working hard to reach people to ensure that nearby residents and businesses can have their say and we would very much welcome any suggestions you had on how to best to reach out to locals at this time.

If you would like to organise a virtual briefing with the team to discuss these proposals in more detail, please do not hesitate to get in contact and I can get a session organised. We will of course keep you informed around the date for wider consultation. Do also get in contact if you have any questions, and I can liaise with the team to get these answered.

Yours sincerely,

Introductory email sent to stakeholders

Dear Sir/ Madam,

I am writing to you to inform you of CO-RE's (the development manager) and M&G Real Estate's (the site owners) proposals for the redevelopment of 247 Tottenham Court Road. In total, the site comprises five buildings, including 247 Tottenham Court Road, 3 Bayley Street, 1 Morwell Street, 2-3 Morwell Street and 4 Morwell Street.

The team, including the architect Stiff + Trevillion, have launched a consultation website – www.247TottenhamCourtRoad.co.uk – which provides further details on the proposals for a new low carbon office building with retail at ground level, alongside the replacement of six existing flats. Taking into consideration the Covid-19 restrictions, we are working hard to reach people to ensure that nearby residents and businesses can have their say and we would very much welcome any suggestions you had on how to best to reach out to locals at this time as well as your feedback on the proposals.

If you would like to organise a virtual briefing with the team to discuss these proposals in more detail, please do not hesitate to get in contact and I can get a session organised.

Yours sincerely,

The 247 Tottenham Court Road consultation team

Follow up emails to stakeholders



CO-RE

8 Frederick's Place
London EC2R 8AB

+44 (0) 20 7814 1000
info@co-re.co.uk
co-re.co.uk

Collaborative Real Estate

Monday 22 June 2020

Dear Sir/ Madam,

Re. Public consultation on proposals for 247 Tottenham Court Road

I am writing to you on behalf of M&G Real Estate, the owner of the site, and CO-RE, the development manager, who together are exploring the redevelopment of 247 Tottenham Court Road in the London Borough of Camden.

The site, which comprises five buildings, including 247 Tottenham Court Road, 3 Bayley Street, 1 Morwell Street, 2-3 Morwell Street and 4 Morwell Street, is located a short walk from Tottenham Court Road Station. It is bordered by Bayley Street to the north and Morwell Street to the east and 248/250 Tottenham Court Road, a small building which separates it from One Bedford Avenue, to the south.

The existing 247 Tottenham Court Road building, which includes office space above ground floor retail, is almost 60 years old and is no longer considered to be fit for modern day working requirements. The properties along Morwell Street and Bayley Street comprise a mix of six residential units and educational facilities for the Architectural Association.

Our ambition for this site is to create a building which is designed to the highest standards providing better accessibility, more sustainable operation, and exemplary environmental standards. Where possible, we will reclaim materials from the existing building, responding to the principles of the circular economy.

The project team would like to let you know that they will shortly be launching a public consultation on their plans for a new low carbon office building with retail at ground level. The proposals for 247 Tottenham Court Road incorporate a moderate increase in height, with a modern brick façade residential element replacing the six existing flats which will serve as a transition between the different scales of Morwell Street, towards Bedford Square and Tottenham Court Road.

In line with the Covid-19 restrictions currently in place, the project team, including architect Stiff + Trevillion, planning consultant Gerald Eve and community engagement specialist London Communications Agency, are working hard to reach people to ensure that local residents and businesses can have their say. In addition to our efforts which will span letter and flyer drops and local advertising and the offer of video calls, we would very much welcome your thoughts on how best to reach out to local people at this time.

At this stage, we would have normally sought to offer you an opportunity to meet to discuss the proposals with the project team, however as face-to-face meetings are not currently possible, we would be more than happy to arrange a virtual briefing. If this would be of interest, please do contact Charlotte Woods at the London Communications Agency at cw@londoncommunications.co.uk and she will get a meeting organised via your preferred means.

Yours sincerely,

David Hutton
Director, CO-RE

Letter to stakeholders, informing them of the proposals



Welcome

To the consultation for 247 Tottenham Court Road



This stakeholder pack provides you with a chance to view the designs and give us your thoughts on our proposals for 247 Tottenham Court Road. Please do note the various contact details listed as part of this pack if you wish to speak to a member of the project team, organise a briefing or provide us with your feedback.

In line with the Covid-19 restrictions currently in place, the project team are working hard to reach people to ensure that local residents and businesses can have their say.

In addition to our efforts to engage with our neighbours via flyer drops and local advertising, we would very much welcome your thoughts on how best to reach out to local people at this time.

Introduction to the project team



M&G Real Estate, the property fund management arm of M&G, are the owners of the site. Last year, they appointed CO-RE, the London based development managers, to oversee the comprehensive development planned for 247 Tottenham Court Road.

CO-RE

CO-RE are central London specialists and have over 20 years' experience in the redevelopment of large-scale complex assets in London. Recent developments include LSQ London, which transformed the entire west side of Leicester Square, and the comprehensive refurbishment of Bureau, Fetter Lane.

Stiff + Trevillion

A highly experienced team have been brought together to create the best possible proposals for this site, including award-winning architect Stiff+Trevillion, the practice behind Pavilion Road in Chelsea. This mixed-use six storey-building, completed in 2016, provides ground floor retail and five levels of office above. Delivered in partnership with the Cadogan Estate, the scheme won the bd Architect of the Year award in 2013.

Stiff+Trevillion also won a New London Architecture award in 2019 for 40 Beak Street in Soho, a glazed brick building which incorporates a ground floor restaurant with office above.



Aerial view of the site looking South East.



LSQ London.



40 Beak Street, Soho.

Other members of the project team include:



Consultation Stakeholder Pack: page 1



The existing buildings



The site location

The site, which is situated a short walk from Tottenham Court Road Station, it is bordered by Bayley Street to the north and Morwell Street to the east and 248/250 Tottenham Court Road, a small building which separates it from One Bedford Avenue, to the south.

The site composition

In total, the site comprises five buildings, all of which have a complex internal relationship. The properties along Morwell Street and Bayley Street comprise a mix of six residential units and facilities for the Architectural Association. The buildings include:



Existing building:
247 Tottenham Court Road

Built almost 60 years ago, 247 Tottenham Court Road comprises ground floor retail with five storeys of office accommodation above. The site also includes a basement used for storage and car parking. The building is no longer fit for modern day working requirements and comprises poor internal layouts and level access.

The existing building facade is approaching the end of its useful life and will need to be replaced with a Part L compliant facade. The cladding has a low level of thermal performance resulting in an Energy Performance Certificate (EPC) rating of D/E, which means that the building is costly to maintain and lacks energy efficiency.



Existing building:
3 Bayley Street

3 Bayley Street forms part of the office building at 247 Tottenham Court Road at first floor, with the floors above comprised of four flats. It is located on the corner of Bayley Street and Morwell Street. At 47 sqm, the one-bedroom flats are below the minimum space standard of 50 sqm, with the two-bedroom flats also not meeting space standards. None of the existing flats have private amenity space which further impacts the quality of the space.

Consultation Stakeholder Pack: page 2



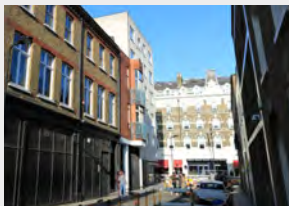
The existing buildings



Existing building:

1 Morwell Street

1 Morwell Street is a residential brick building which is comprised of two residential apartments.



Existing building:

2-3 Morwell Street

2-3 Morwell Street is linked to the retail units along Tottenham Court Road at ground and basement level. The first and second floors comprise office floorspace.



Existing building:

4 Morwell Street

4 Morwell Street is used by the Architectural Association as studios, administrative offices and storage. The ramp which provides access to the basement car parking for the office building cuts through the ground floor of 4 Morwell Street.



Bayley Street looking west.



Morwell Street looking north.

Consultation Stakeholder Pack: Page 3



Site and context



Site history

The presence of Tottenham Court Road pre-dates any development in the areas to the east and west of this important London route.

Bloomsbury, which is located to the east of the site, and Fitzrovia, to the west, were both developed in the 17th and 18th centuries. Bedford Square, which is situated to the east of the site, has remained much as it was originally built.

By contrast, Tottenham Court Road has been redeveloped on a plot by plot basis over time, as is typical of main roads. There are several larger buildings such as that of the Heal's building and 1 Bedford Avenue. Many of the buildings along Tottenham Court Road have a similar aesthetic with predominantly concrete or stone facades.

Located towards the north of Tottenham Court Road are larger scale, modern buildings, with smaller scale, brick period buildings found towards the centre of the route. Again, larger scale modern buildings can be found at the southern end of the road, which results in quite a varied streetscape with no common theme.

Wider context

Whilst the site does not lie within a Conservation Area, it abuts the Bloomsbury Conservation Area and the Charlotte Street Conservation Area which is located to the north-west of the site. There are no listed buildings within the site's boundary.



View looking north, St Giles Circus, circa 1900.



Bedford Square, circa 1949.



One Bedford Square.



Heal's building, Tottenham Court Road.

Consultation Stakeholder Pack: Page 4



The opportunity

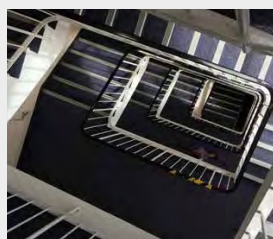


Existing condition

The 247 Tottenham Court Road building is approaching 60 years. In the time since this building was first built, workplace and retail requirements have changed considerably.

The relationship the building has with the four other buildings on site along Morwell and Bayley Street is incoherent and complex. This building is no longer considered fit-for-purpose, mainly due to the following reasons:

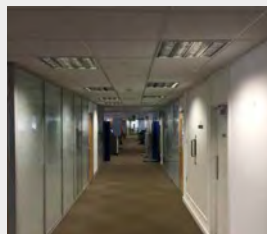
1. Poor internal layouts and inflexible work and retail space.
2. Stepped access across all three elevations impacts the office, retail and residential.
3. Out of date mechanical and ventilation systems which are in need of substantial refurbishment.
4. Office and retail units do not have level access due to a slight slope along Tottenham Court Road.
5. Vertical transportation needs to be replaced and expanded to suit the needs of modern workspace.
6. Low thermal performance rating of external facades with poor quality glazing.
7. Incorporation of poor-quality building materials which are coming to an end of their lifespan.
8. Poor quality residential accommodation which is below modern space standards.



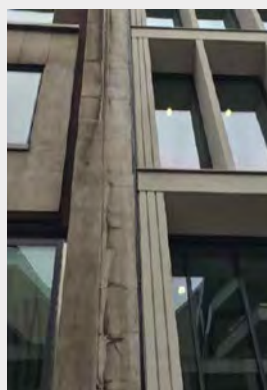
Vertical transportation.



Lack of level access.



Poor internal spaces.



Deteriorous and failing materials.



Poor thermal performance of facades and cladding.



Mechanical and ventilation systems.

Consultation Stakeholder Pack: Page 5



The opportunity

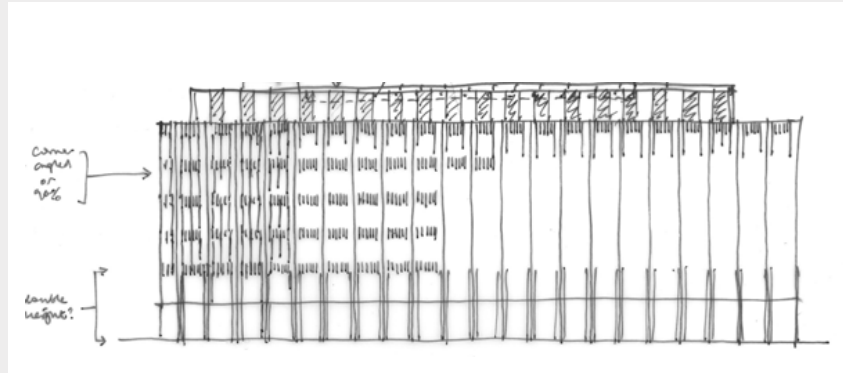
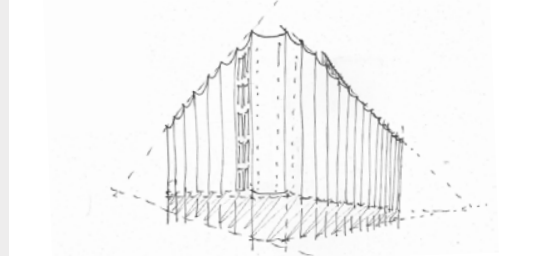


Our proposals

Our proposals for 247 Tottenham Court Road replace the existing buildings with a mixed-use office, retail and residential building that respects the scale and materiality of its neighbours. We think that this site provides an exciting opportunity to deliver:

1. An adaptable and future proofed building designed for long-life use to allow for alternative uses in the future.
2. A sedum green roof with Photovoltaics.
3. Public planting along Bayley Street to complement the wider West End Project.
4. Improved residential accommodation with new high quality and sustainable homes built to modern space standards, all enjoying their own private amenity.
5. Level access to all uses within the building.
6. High quality, flexible office space and amenity for workers including end of trip facilities for cyclists.
7. A roof terrace and new biodiversity, providing habitat for flora and fauna.

8. A sustainable clean and low energy building that is designed to the highest environmental standards.
9. An enlivened street frontage on Morwell Street.
10. A car free development, making best use of the site's excellent transport connections.
11. New and improved quality flexible retail space and enlivened frontages.
12. A pocket park located near the entrance of the office on Bayley Street.



Architectural design sketches and design development.

Consultation Stakeholder Pack: Page 6



The proposals



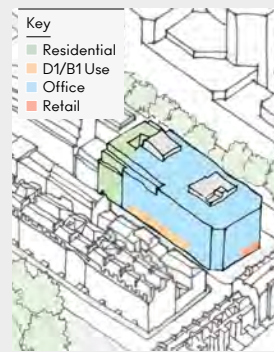
Design development

The design team has sought to respond to the contrasting scales of Tottenham Court Road, Bayley Street, Morwell Street and beyond to Bedford Square, whilst looking to create a distinction between the different uses through a subtly designed scalloped building form with a varied and distinctive facade. A key aspiration for the design is to maximise activity at ground floor level.

Along Tottenham Court Road, the proposals are for ground floor flexible retail uses, plus five storeys of office accommodation above, with a pocket park proposed for near the entrance of the office on Bayley Street. The existing Santander cycle docking station would be relocated along Tottenham Court Road and expanded.

The residential element has been positioned to the southern part of the site, with the entrance located on Morwell Street to reflect its predominantly domestic scale. The residential floor to ceiling heights would match those of the office to allow future flexibility in terms of land use across the site.

We are considering updating designs so that the building steps down and is set back by 2.5 metres at 4th floor level along Morwell Street to minimise the impact of views from Bedford Square, with the building set back at the 5th floor level on the corner of Bayley Street and Morwell Street. Greened terraces could be included along the fifth floor elevation. A terrace and urban greening has been incorporated as part of the roof space and a chamfer has been introduced on the corner of Bayley and Morwell Street to increase the level of public realm on this corner.



Proposed illustration of uses.



Proposed view from Percy Street looking south east.



Proposed Bayley Street section.

Consultation Stakeholder Pack: Page 7



The proposals



Retail

The mix of retail uses is proposed flexibly to allow a mix of different sized occupants within Class A1/A2/A3/D2 uses. The percentage provided as class A1 along Tottenham Court Road will be agreed with the local authority. This would be secured through planning conditions which would confirm the scale and mix of uses. Having a mix of retail uses will safeguard the vibrancy and vitality of the new retail in these challenging times for the high street.

The active frontage will extend further than existing – wrapping around the corner onto Morwell Street where there will be a café entrance. The ground floor experience will be framed with a dark stone plinth and floor to ceiling glazing. It will provide level threshold access to each unit and have potential for increased floor to ceiling heights.

The retail element will be serviced via Morwell Street where the waste storage and collection will also be managed.



Proposed view of Tottenham Court Road looking north.

Residential

There are currently six dwellings located on-site, four of which are two beds (three persons) and two are one beds (two persons). The one bed flats are smaller than current minimum space standards and none of the existing dwellings have any private outdoor amenity space.

The proposals offer a rich mix of dwelling types including two bed, three bed, and four bed flats delivering much needed larger units as per council preference. All the flats will be larger than minimum space standards, each enjoying private outdoor amenity space.

The new units will all enjoy excellent levels of natural light and ventilation (with floor to ceiling windows) and will have secure enclosed cycle storage and enclosed waste storage.

These new homes will enjoy a dedicated entrance on Morwell street with a comfortable reception/lobby area.



Proposed residential bay study.

Consultation Stakeholder Pack: Page 8



The proposals



Proposed materials

The proposal expresses the base of the building, the increase in the active public uses, and is finished in a hard-wearing urban material such as honed grey basalt.

The proposed building is clad in a material that allows its curvilinear 'baroque' form to be expressed sculpturally and to reflect light and shadow as the day goes by.

High gloss glazed terracotta is proposed for the Tottenham Court Road facade. A decision on colour has not been reached but we are developing this idea currently with officers at the London Borough of Camden.

The residential building is brick clad, it reads as a building in its own right and it acts as a moderator between the different scales of the surrounding streets.



Precedent materials example for Morwell Street facade, Carlsberg researcher apartments, Pratsis Architect.

Option One

Brown high gloss glazed terracotta facade.



Option Two

Green high gloss glazed terracotta.



Option Three

White high gloss glazed terracotta facade.



Consultation Stakeholder Pack: Page 9



The proposals



Office

The upper parts of the office building have a simple order that is broken at first floor with larger windows which reflects the two storey bases of some of its neighbours.

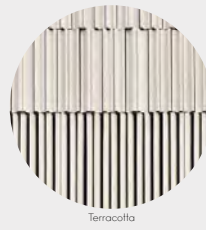
The proposals would see an increase in office accommodation, with the building designed with a focus on occupier flexibility and wellbeing.

The new office spaces will enjoy large open plan flexible floorplates that have potential for accommodating either single or multiple tenants. The proposed will provide increased floor to ceiling heights with full height glazing and the entrance will be set into the middle of Bayley Street. It will feature a level threshold entrance with a spacious lobby and a dedicated cycle entrance leading to secure basement cycle storage and end of trip facilities.

The offices will be served by two cores, one to the north of the site – located off the main office entrance and a second core at the south of the site which will also be the firefighting core, and back of house access.

The offices will enjoy a dual ventilation strategy providing opportunity for both passive and mechanical ventilation.

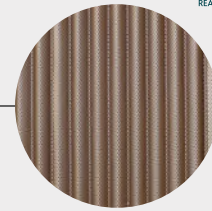
In line with ongoing design considerations, there could be office terraces at 4th and 5th floor level which could feature planters and greening.



Terracotta



Proposed office bay study.



Perforated Metal



Granite

Consultation Stakeholder Pack: Page 10

Sustainability and whole-life carbon approach



Sustainable design

As part of our designs for the site, the team has explored options around retaining the frame of the existing 247 Tottenham Court Road building. Studies however have shown that the existing conditions are inadequate for contemporary use for a comprehensive office led mixed use development. The existing basement however will largely be retained and reused.

Studies instead have shown that a new low-carbon designed building will have a lower whole life carbon footprint than several of the refurbishment examples which have been assessed. Once in use, the building will be zero carbon.

Our ambition for this site is to create a building which is designed to the highest standards providing better accessibility, with exemplary environmental standards.

As part of the design proposals, we have incorporated some key principles to ensure a sustainable and energy efficient development:

- An energy efficient and low embodied carbon project.
- Reclaimed materials from the existing building will be reused, responding to the principles of the circular economy. Demolition materials will also be reused.

- A building designed for long-life use, incorporating robust and efficient materials.
- Building design optimised for whole life carbon performance.
- An energy efficient facade, including roof mounted solar photovoltaics.
- A number of low carbon construction methods being considered.
- Minimal use of plastics in building services installations so that recycled metals can be included in the installations.
- Building services systems designed for the ease of maintenance and future climate conditions to minimise frequency of central plant replacement.
- Air source heat pumps offering a low-carbon operation solution for the building.
- Building design set to achieve a BREEAM Excellent rating.
- Green landscaping and planting throughout the proposed scheme providing new habitats for flora and fauna.



Proposed view looking south east.

Consultation Stakeholder Pack: Page 11

Benefits to community and next steps



The proposals for 247 Tottenham Court Road present a number of key benefits:

1. A sustainable, mixed-use development, designed for long-life use.
2. High-quality, flexible office and retail space.
3. Roof terrace providing habitat for fauna and flora.
4. Opportunity to build a zero-carbon office building in use.
5. A lower lifetime carbon solution.
6. Minimal impact to Bedford Square.
7. Dual aspect residential units.
8. Urban greening.
9. Improved access and level thresholds.
10. Better quality of amenity space for residential.
11. Increased active frontages.
12. Mixed mode ventilation systems to provide clean air to tenants.
13. Improved quality floor to ceiling heights in offices.
14. Better quality of amenity space for offices.
15. End of trip facilities for office and retail uses.
16. Supporting sustainable means of transport.
17. A car free development.
18. Improved energy performing buildings.
19. Increased future flexibility through dual aspect office space and central cores.
20. Improved vertical transport provisions.
21. Better natural daylight.
22. Better quality and more flexible retail spaces.

Next steps

After this consultation, we will spend some time reviewing the feedback received and working with officers at the London Borough of Camden to finalise the designs ahead of submitting an application later this summer.

We will continue to meet with local residents, businesses and interest groups and are happy to organise virtual briefing sessions on request.



Thank you

Thank you for taking the time to read our stakeholder pack in order to learn more about the proposals for 247 Tottenham Court Road.

We would like to hear your views on our proposals before we submit a planning application to the London Borough of Camden later this summer. Please use the contact details below to provide your feedback or to speak to a member of the project team.



Email
247TottenhamCourtRoad@londoncommunications.co.uk



Telephone (Freephone)
0800 307 7548



Website
www.247TottenhamCourtRoad.co.uk

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