



**GERALDEVE**

London Borough of Camden  
Development Management  
2nd Floor, 5 Pancras Square  
LONDON  
N1C 4AG

72 Welbeck Street London W1G 0AY  
Tel. 020 7493 3338  
[www.geraldeve.com](http://www.geraldeve.com)

**FAO: Nora-Andreea Constantinescu**

14 August 2020

**Our ref: RGU/U0013465**

**Your ref: PP-08970364**

Dear Sir / Madam

**Application for Minor Material Amendments following the Grant of Planning Permission (ref. 2005/0259/P) Under Section 73 of the Town and Country Planning Act 1990**

We write on behalf of our client, Central Saint Giles Limited Partnership, to apply for minor material amendments under Section 73 of the Town and Country Planning Act 1990. The amendments relate to Planning Permission (ref. 2005/0259/P) granted in October 2006 relating to Central Saint Giles, St Giles Court, 1-13 St Giles High Street, London, WC2H 8LB (hereafter referred to as the 'Site').

**Background**

On 04 October 2006 planning permission (ref: 2005/0259/P) was approved for the following:

**Redevelopment of site for mixed use development comprising office (class B1), retail (class A1), food and drink (class A3), community (class D1) and residential (class C3) uses, new public courtyard and new pedestrian routes across the site.**

This development has been built in full and is occupied. All relevant conditions and obligations have been discharged. There have been a number of amendment applications.

Since grant of planning permission there has been a shift in the requirements of a modern office tenant. The existing cycle parking storage and shower facilities are no longer sufficient to meet occupant demands and the Applicant is therefore proposing to upgrade the facilities. The increase in shower facilities will lead to an increased demand for hot water and therefore an upgrade to the building heating system is also being proposed. These proposed amendments were presented to Camden at a formal pre-application meeting on the 23<sup>rd</sup> of June 2020. At this meeting it was agreed that the most appropriate route for approval was via a Section 73 application to vary the original October 2006 planning permission (ref: 2005/0259/P) relevant to the proposed changes.

**Proposed Amendments**

In this context, the set of proposed works consists of:

- Increased provision of short and long stay cycle storage facilities to reflect an increase in cycling by building occupants;
- Provision of automatic sliding entrance door in the loading bay to provide access for cyclists;
- Increased provision of shower facilities to accompany the increase in cycle storage and including refurbishment of existing shower facilities;
- Heating plant upgrade including:
  - Removal of installed biomass boilers;

- Increased gas boiler capacity, including recommissioning of existing accumulator tank;
- Increase DHW calorifier capacity; and
- Use of water to water heat pumps to recover waste heat from the cooling system and use it to generate heating.

As a result of the above changes it is proposed to vary the following conditions:

### Cycle Parking Provision

Condition 20 of the permission sets out the required number of motorcycle and cycle parking spaces which should be retained. It is proposed to increase the provision of long stay and short stay cycle spaces as per table 1 and 2 below.

#### Revised Condition Wording – Condition 20

The 12 motorcycle and ~~349~~ **464** cycle parking spaces shown on the approved drawings shall be provided ~~prior to occupation of the development~~ and shall thereafter be retained and used for no purpose other than for the parking of motorcycle and cycles for user and occupiers of the development

*Table 1 – Proposed Long Stay Cycle Parking*

2 Tier	336
Vertical	53
Bike Locker	8
Hoop (Electric) <sup>1</sup>	16
Hoop (Accessible)	1
<b>Total</b>	<b>414</b>

It should be noted that the cycle parking has been increased as much as possible to meet modern occupier standards however the overall number is restricted within the parameters of the existing building. Please refer to the proposed basement level 01 plan which indicates the revised location of the bike parking facilities (dwg no. 0330).

*Table 2 – Proposed Short Stay Cycle Parking*

<b>Hoop (External)</b>	<b>50</b>
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The proposed short stay cycle parking is located on Dyott Street within the application boundary. A total of 25 hoops are proposed which accommodate one bike either side. Please refer to the Proposed Dyottt Street Cycle Parking (dwg no. 0332) and Proposed Section through Dyott Street (dwg: 0333).

### Loading Bay Entrance Door

A revised entrance door is proposed within the loading bay for cyclists. The proposed door will be distinct yellow colour and the doors will be automatic and sliding for easy of access. The service bollard will have access control. Please refer to Loading Bay Entrance drawing (dwg no: 0334) prepared by Suttonca for further details.

<sup>1</sup> All electric hoop bike parking stations can cater for recumbent cycles.

## Energy Strategy

As required by condition 27 prior to commencement of works an Energy Statement and plans were submitted to and approved by the local planning authority. Energy Efficiency and Renewable Energy Statement (dated February 2007) was approved in July 2007 under reference 2007/2520/P.

Part d of condition 27 requires that any changes to the provisions of the Energy Statement must be agreed by the local planning authority.

The original Energy Statement included a biomass boiler system to produce 80% of the annual heating demand with a gas boiler system to produce the remainder during peak times. The use of biomass boilers is now contrary to Camden and GLA policy due to its negative impact on local air quality. Relevant policies include the Camden Council Clean Air Action Plan 2010-2022, Camden Local Plan Policy CC4 (Air Quality), Camden Planning Guidance Air Quality (March 2019) and the Intent to Publish London Plan (2019) Policy SI 1 (Improving Air Quality). Removing the use of the biomass will have a positive impact on the local air quality. Therefore, there is a compelling case for the decommissioning of the biomass boiler system.

The heat demand of the offices, affordable and private residential buildings within the development can currently be met by the installed gas boilers, however the capacity is not sufficient to operate all areas of the development at full load. Additionally, the increased heat demand associated with the upgraded cycle and shower facilities places further pressure on the system. Therefore, an intervention is required to increase capacity.

As per the original Energy Statement (dated 2007), as the biomass boiler system has become unfeasible to operate an alternative option for carbon reduction was introduced as a Water to Water Heat Pump (WWHP). One of the two existing gas boilers has been replaced with a modular condensing boiler, which has resulted in increased operational efficiency. Additionally, it is now proposed to recommission the existing accumulator tank to use as a thermal store, which will allow heat produced at high efficiency by the heat pump to be stored if it cannot be immediately used.

As requested at pre-application, analysis has been undertaken to demonstrate that the introduction of the WWHP, along with the proposed changes, results in a carbon reduction compared to the system as it would be without intervention i.e. the removal of the biomass boilers with no replacement low carbon technology. Please refer to the Addendum Energy Statement prepared by ARUP and submitted in support of this application.

In the context of the above, it is proposed that condition 27 should be removed and the wording of condition 28 should be replaced.

### Revised Condition Wording – Condition 28

**~~Prior to occupation of any relevant part of the development, the applicant must construct and implement the measures contained within the approved Energy Statement submitted~~ Addendum Energy Strategy (dated July 2020) and maintain them thereafter unless otherwise agreed in writing with the local authority.**

## Sustainability Addendum

Some of the proposed changes will require a deed of variation to the S106 agreement to amend the Eight Schedule of the agreement which encloses the Sustainability Plan, specifically sections 4 (renewable energy) and section 5 (water conservation).

## Acoustic Implications

As part of the proposed changes, an extract fan will be provided in the new female shower and changing area which will be located in the new bike park 01, in a similar position to the existing biomass boiler room fan which will be stripped out as part of the biomass boiler room removal works.

The new female shower and changing area extract fan will be exhausting into the existing biomass boiler ventilation plenum and into the existing louvre location at high level on Dyott Street. The noise levels of the proposed fan have been assessed and it has been demonstrated that the measured noise at each octave band frequency for the proposed fan is lower than the original fan. There, it is not expected that the proposed fan presents a risk of increase noise to the surrounding area.

It should also be noted that the heat pumps and condensing boiler in the proposed design will not have an impact on surrounding neighbourhood noise levels, as they are installed within internal plantrooms and will not have connection to the outside.

An addendum Acoustic Report has been prepared by ARUP which should sit alongside the previously approved report under condition 9. The development will continue to be in compliance with the maximum noise levels.

### Revised Condition Wording – Condition 9

~~Details of plant (including an acoustic report, sound attenuation and acoustic isolation from the structure to be installed as part of the development shall be submitted to and approved by the local planning authority prior to commencement of each part of the development. The development shall only be carried out in accordance with such approved details acoustic details submitted and approved under reference 2009/0161/P including the Building Services Noise Emissions Document (ARUP Acoustics, 22 October 2008) including specified maximum noise levels, and the Building Services Noise Emissions Addendum (dated 10 August 2020) and thereafter maintained.~~

## Application Documentation

In this regard the following application documents and plans have been provided:

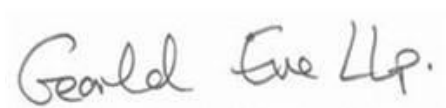
- Site Location Plan;
- Completed application form;
- Existing and Proposed Plans, prepared by Suttonca;
- Energy Strategy Addendum, prepared by ARUP;
- Sustainability Statement Addendum, prepared by ARUP; and
- Building Services Noise Emissions Addendum, prepared by ARUP.

A full list of the permitted, existing and proposed drawings is set out within **Appendix A** overleaf.

The request application fee of £234 plus £25 portal fee will be paid online.

We trust this submission is sufficient for you to determine the application, but should you have any questions, please do not hesitate to Rebecca Gunn (020 7333 6407 / rgunn@geraldeva.com) of this office.

Yours faithfully

A handwritten signature in dark ink that reads "Gerald Eve LLP." The signature is written in a cursive, flowing style.

**Gerald Eve LLP**

Rgunn@geraldev.com  
Mobile. +44 (0)7585988875

## APPENDIX A

### PERMITTED DRAWINGS

Drawing Name	Drawing Number
Proposed Scheme Ground Floor Plan	RP-1-00-ST
Proposed General Plan Basement 1	RP-1-00-B1

### EXISTING DRAWINGS

The internal layout of elements of the ground and basement (where not restricted by planning condition) has been amended since originally approved and built out. Therefore, existing drawings have been provided.

Drawing Name	Drawing Number
Site Location Plan	1299 0300
Existing Site Plan	1299 0301
Existing Ground Floor Plan	1299 0311
Existing Plan Basement 1	1299 0310
Existing Plan Dyott Street Cycle Parking	1299 0312
Existing Section Dyott Street Cycle Parking	1299 0313
Existing Loading Bay Entrance	1299 0314

## PROPOSED DRAWINGS

Drawing Name	Drawing Number
Proposed Ground Floor Plan	1299 0331
Proposed Plan Basement 1	1299 0330
Proposed Plan Dyott Street Cycle Parking	1299 0332
Proposed Section Dyott Street Cycle Parking	1299 0333
Proposed Loading Bay Entrance	1299 0334

## FOR INFORMATION

Drawing Name	Drawing Number
Bike Park 01 Plan	1299 0340
Bike Park 02 Plan	1299 0341
Bike Park 03 Plan	1299 0342