



**GERALDEVE**

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**FAO: Jonathan McClue**

15 September 2020

**Our ref: NJB/NFD/AKG/J6350A**

**Your ref: PP-08908459**

Dear Jonathan,

**12 and 12a St Giles Square, London WC2H 8AP  
Full Planning Permission and Listed Building Consent Application**

We write on behalf of our client, Almancantar Centre Point Investments Sarl, to submit an application for planning permission and listed building consent at 12 and 12a St Giles Square, London WC2H 8AP ('the site') (previously known as Unit R05) for the following proposals in respect of their occupation for flexible Class E use:

**Planning Permission: "Use of the site as Class E (Business, Commercial and Services) and associated physical works"**

**Listed Building Consent: "Installation of dividing wall between the units, two new entrance doors to the St Giles Square façade, infilling of void, removal of balustrade, installation of new external louvres at second floor level and all other works associated with the use of the site as Class E (Business, Commercial and Services)"**

**Site and Surroundings**

The site is located within the London Borough of Camden (LBC).

The site is designated on the LBC's Policies Map as within the Central London Area and the Tottenham Court Road Growth Area.

The site is part of a Grade II listed building and is located within the designated Denmark Street Conservation Area.

12 and 12a St Giles Square are located at part ground (access to upper floors and existing retail unit), first floor and mezzanine level within Centre Point House.

**Background**

On 1 April 2014 planning permission (ref: 2013/1957/P) and listed building consent (ref: 2013/1961/L) were approved at the site for the:

**"(Scheme A) Change of use of Centre Point Tower from office (Class B1) and restaurant/bar (Sui Generis) to residential (Class C3) to provide 82 self-contained flats (16 x one bedroom,**

**37 x two bedroom, 26 x three bedroom, 2 x 4 bedroom and 1 x 4 bedroom duplex) and ancillary residential floorspace (spa, gym and pool); change of use of Centre Point Link from office (Class B1) and bar (Class A4) to a flexible retail/restaurant/bar use (Class A1/A3/A4); change of use of Centre Point House at first and second floor levels from office (Class B1) to flexible retail/restaurant/bar use (Class A1, A3, A4); alterations and extensions to the existing building at ground floor level to provide flexible retail/restaurant/bar use (Class A1, A3, A4). Alterations to the external elevations of Centre Point Tower, Centre Point Link and Centre Point House including the relocation internally of the existing external ground and mezzanine eastern and western staircases, replacement and refurbishment of the facades, fenestrations and shopfronts, new pedestrian link through Centre Point House and associated basement car parking, terraces, landscaping, highway works (including the relocation of bus stands in Earnshaw Street), servicing and access arrangements and extract ducts. Redevelopment of the Intrepid Fox public house to provide flexible retail/restaurant/bar (Class A1, A3, A4) with 13 affordable housing units (8 x one bedroom, 3 x three bedroom and 2 x four bedroom) above in an eleven storey building (including basement) and associated basement car parking, terraces, servicing and access arrangements, and extract ducts.”**

On 30 November 2017 the following tenant fit-out works for Vapiano were approved under listed building consent ref: 2017/4222/L:

**“Internal alterations including the installation of fixtures, fittings, signage and partition walls at first floor level with new mezzanine level above, associated with fit out to Unit R05 (Class A3) at ground and first floor levels”.**

The fit-out works were completed and Vapiano occupied the site. Vapiano has since entered administration and closed this site as a result of the Covid-19 pandemic.

## **Proposals**

This application seeks planning permission and listed building consent for the physical works required at the site to enable the floorspace to be occupied for flexible Class E 'Business, Commercial and Services' use, akin to an office user.

The physical works proposed at the site, for which express listed building consent and planning permission is sought, are set in a full Schedule of Works included at Section 4.0 of the Design and Access Statement, prepared by MICA Architects.

## **Local Development Framework**

The London Borough of Camden's Local Development Framework comprises of the following planning policy documents: The National Planning Policy Framework (2019), the London Plan (as amended, 2016) and the Camden Local Plan (2017).

In addition, supplementary planning documents relevant to the proposals include the Denmark Conservation Area Appraisal and Management Plan (2010) and Camden's Advertisements CPG (March, 2018).

Camden are consulting on redrafts of several of their CPG documents.

## **Statutory Legislation**

Statute regarding the heritage environment is relevant to this application. Both the site's historic fabric and the surrounding environment have been carefully considered in the development of the proposals having regard for the statutory legislation set out below.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that local planning authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.

Section 72 of the same Act states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

## **National Planning Policy Framework**

Under paragraph 189 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting. Paragraph 192 states that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

Where a development proposal will lead to a less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 195).

## **Planning Considerations**

### Land Use – Class E

This application seeks to confirm the use of the site as Class E Commercial, Business and Services.

Under the masterplan planning permission (ref: 2013/1957/P) the site has permitted flexible Class A1/A2/A3 use. The site was subsequently occupied for Class A3 use. As a result, the site's lawful use became Class E use on the 1 September 2020.

The use of the site for Class E use is suitable for this location and would contribute to the function and character of the wider masterplan site and the immediately surrounding area.

### Heritage and Design

Camden Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. In order to maintain the character of Camden's conservation areas the council will require that development within conservation areas preserves or, where possible,

enhances the character or appearance of the area. The Council will also resist development that would cause harm to significance of a listed building through an effect on its setting or would cause harm to its special architectural and historic interest.

The proposals have been designed so as to have minimal impact on the existing building and to retain and enhance the principal features of the space which were exposed as part of the recent refurbishment works. The following design principles have been followed:

- i. Retention of openness at first floor level, with servicing designed to enable the occupation of the space as an open plan office; and
- ii. Protection of the visibility and appreciation of the openness of the space at first floor level with minimal fixings to the soffit, and distribution of services in the floor void.

A full Schedule of Works is included at Section 4.0 of the Design and Access Statement, prepared by MICA Architects.

It is considered that the proposals will deliver the following public benefits:

- i. Sensitive refurbishment of the floorspace for its optimum viable use;
- ii. Enhancement and preservation of the unique historical significance of Centre Point House as part of one of Britain's best speculative office buildings;
- iii. Deliver flexible commercial floorspace of the highest quality;
- iv. Enliven the ground floor of the site which fronts onto the newly established public piazza at St. Giles Square; and
- v. Preserve and enhance the character and appearance of the Denmark Street Conservation Area.

The works have been designed to be sensitive to the historic fabric and require minimal interventions. The materials proposed will complement the features of the existing building and enhance and preserve the historic significance of the listed building.

The installation of two new doors onto the public piazza to enable and improve access to the units are considered minimal and would not harm the character and appearance of the conservation area or the listed building. It is considered that any perceived harm caused by the introduction of the doors is significantly outweighed by the public benefits to be delivered by the proposed development both to the units and the wider Centre Point Estate.

The internal changes will not affect views of the site from the conservation area and will deliver flexibility to the site to attract and retain future potential occupiers for optimum use.

The proposals are therefore considered to comply with relevant national and local planning policy and meet the statutory tests of Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

#### Amenity – Noise

Through Local Plan Policy A4, Camden seek to ensure that noise and vibration is controlled and managed.

The proposed office fit-out includes the installation of replacement plant equipment, located in the Level 1 mezzanine plant room and the Level 2 plant room. As such an Acoustic Report, prepared by Sandy Brown has been submitted in support of these proposals.

The report demonstrates that, with the confirmed mitigation measures in place, the proposed plant will operate within the limits approved under the planning permission for the refurbishment of the wider site (Condition 19, ref: 2017/0994/P). The detailed drawings of the proposed landlord plant will be issued to Camden in due course.

As such, the proposals are in line with Local Plan Policy A4.

### Sustainability

Sweco have prepared a Sustainability Statement to assess the proposals against the masterplan.

The Sustainability Statement demonstrates that the use of the site for Class E use will adhere to the approved sustainability principles at the site as approved under the masterplan planning permission ref: 2017/0994/P.

### Transport

According to the Intend to Publish London Plan, the use of the site for Class E use would generate the requirement for 13 long stay cycle spaces. Short-term cycle requirements could be met in the public realm once the public realm works are completed.

The applicant has confirmed that 13 of the existing long stay cycle spaces at the site will be assigned to the proposed Class E use. This is in line with the Intend to Publish London Plan requirements for office use.

All delivery and servicing activities will take place in accordance with details approved under the masterplan planning permission ref: 2013/1957/P and associated s106 obligations.

### **Conclusion**

It is considered that the proposals represent a sensitive treatment of this site within the context of the listed building and will result in the preservation of its historical significance. The works proposed will enable the use of the site for its originally intended use and will preserve the character and appearance of the Denmark Street Conservation Area.

The proposals comply with the required planning policy and meet the relevant statutory tests as the proposals would result in no harm to the heritage asset. Planning permission and listed building consent should therefore be granted.

### **Application Documentation**

Please find enclosed the following documents in support of this application:

- Application forms and notices;
- Site Location Plan;
- Design, Access and Heritage Statement (including Schedule of Works, site images, 3D views and operational maintenance strategy), prepared by MICA;
- Existing and demolition plan, section and elevation drawings, prepared by MICA;
- Proposed plan, section and elevation drawings, prepared by MICA
- Mechanical & Ventilation Services Layout (to follow); and

- Noise Report, prepared by Sandy Brown.

The requisite application fee has been paid online.

We look forward to your confirmation of the validation of this application. In the meantime, please contact Anna Gargan of this office should you have any questions.

Yours faithfully,



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