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18 November 2020

Our ref: LJW/NDA/LLJ/U0010439/1

Your ref: 2020/3583/P

By email: Laura.Hazelton@camden.gov.uk
Alastair.Crockett@camden.gov.uk

Dear Laura

247 Tottenham Court Road
Application Amendments and Response to Consultation

We write in respect of the application for full planning permission (refs. 2020/3583/P) at 247 Tottenham Court Road submitted by Gerald Eve LLP on behalf of our Client, Prudential UK Real Estate Nominee 1 Limited and Prudential UK Real Estate Nominee 2 Limited (the "Applicant").

This letter summarises the amendments which are proposed to the submitted application and addresses responses received during the consultation letter.

Application Amendments

In response to comments received from Officers and local stakeholders, amendments are proposed to the submitted application. These relate to:-

- A revised elevational treatment of Morwell Street;
- A reduction in the extent of plant equipment at roof level following further detailed design;
- Alterations to the layout of proposed commercial long stay cycle parking;
- Amendments to the proposed loading strategy for the site; and
- Amendments to the Draft Construction Management Plan.

A series of documents have been prepared to set out these changes:-

- Design and Access Statement Addendum, prepared by Stiff + Trevillion Architects;
- Revised proposed plans, elevations and drawing schedule, prepared by Stiff + Trevillion Architects;
- Revised Draft Construction Management Plan, prepared by Momentum;
- Loading Addendum Note, prepared by Momentum; and
- Daylight/Sunlight Letter, prepared by Point 2 Surveyors.

Further Consultation

Following discussion with Camden's Transport officers and amendments to the draft Construction Management Plan, the Applicant informed local residents and key stakeholders about the changes to the construction access routes to and from the site. In his capacity as the ward member for the site (Bloomsbury) and brief as the Cabinet Member for Sustainable Camden, Cllr Adam Harrison (Labour) was also consulted. An email was subsequently sent to resident associations and community organisations, including Bloomsbury Conservation Area Advisory Committee, Bloomsbury Association, Charlotte Street Association, Fitzrovia Neighbourhood Association, Ecole Jeanine Manuel and Bedford Estates.

Local residents living in and around the site were consulted again via email. An ongoing dialogue has been maintained with these stakeholders and offers for virtual briefings to discuss the new access routes in greater detail were also made.

In tandem with this substitution, the revised application documents and a copy of this letter have been uploaded to the consultation website (www.247TottenhamCourtRoad.co.uk) and residents and other stakeholders have been notified by email.

Design Changes

Comments have been raised by stakeholders and Officers in respect of the proposed design. Changes are proposed to Morwell Street in order to provide further articulation and detailing to the brick element of this façade. At fifth floor level, it is proposed to replicate the scalloped terracotta finish to match the floors below. The remainder of Morwell Street will be treated in brick with two elements within slightly different treatments to differentiate the commercial and residential element of the proposals.

Concern has been raised about the extent of rooftop plant equipment. Through further detailed design, it has been possible to reduce this bulk further to minimise the impact. As agreed with Officers, view 8 of the submitted Heritage, Townscape and Visual Impact Assessment has been revised to highlight the impact of the proposals from the south eastern side of Bedford Square.

These changes have been updated on the submitted drawings sought for approval. Point 2 Surveyors have confirmed that the alterations to the massing at roof level do not change the conclusions of the original Daylight/Sunlight Assessment. They have prepared a letter which confirms this.

Transport/Cycle Parking

Following comments from Transport Officers, it has been agreed that on-street servicing can take place from the existing on-street loading bays on Morwell Street and Bayley Street. Momentum have prepared a Loading Addendum Note which sets out that these bays have capacity to serve the projected servicing demand for the development.

In response to comments regarding compliance with the London Cycling Design Standards (LCDS), further review of basement layout has been undertaken to improve aisle widths. The aisle width between the two-tier racks has increased to 2.75m, and a small number of lockers (which were proposed over and above London Plan standards have been removed) to facilitate a wider aisle

accessing the non-standard cycle store area. The lift dimension is 2.3m in depth by 1.2m in width, in line with LCDS standards.

It is considered reasonable that a higher proportion of folding cycle lockers is proposed than is allowed for in guidance. This is due to the site's close proximity to a number of major rail termini – Tottenham Court Road is soon to have Elizabeth line services, and the site is just over 1km south of Euston Station and under 2km from Kings Cross Station. The site is therefore within superb catchment of major rail services from the north and across the east and west of London, lending itself particularly well to the use of folding bikes by end users.

With the uptake in cycling during the Covid-19 pandemic, it is also considered likely that the proportion of folding bicycles will increase its rate of growth in London substantially, evidenced by very strong sales figures throughout the pandemic. As such, it is proposed that the proportion of cycles remains the same as the submitted application.

Construction Logistics

Feedback from Transport Officers and the Council's West End Project Team have confirmed that the proposed traffic route presented in the submitted Draft Construction Management Plan ("CMP") are not acceptable due to the traffic restrictions in place on Tottenham Court Road as a result of the West End Project ("WEP").

We have updated the draft CMP to propose three options:-

- (1) Construction traffic uses Tottenham Court Road for access/egress;
- (2) Construction traffic uses Gower Street/Bedford Avenue/Bedford Square for access/egress; and
- (3) Construction traffic uses a hybrid of both options using Tottenham Court Road for large deliveries early in the morning outside of the West End Project restrictions.

Officers have been clear that the construction traffic route needs to respect the Council's investment in the WEP. The Design Team have explored multiple routes which use Tottenham Court Road and a pit lane on Bayley Street, however the Council have indicated that the current permitted right turn from Percy Street onto Tottenham Court Road southbound is imminently going to be removed as part of forthcoming further changes to traffic movements.

The draft CMP nonetheless includes all three options to allow for flexibility and further discussion with Officers and Residents to work together to seek to find a mutually beneficial solution for all.

The Applicant recognises the impact that construction traffic and vehicle movements can have on residents and have worked hard to avoid Bedford Avenue and Bedford Square, however the WEP traffic restrictions make this very challenging. The Applicant confirms their intention to set up and maintain a Residents Liaison Group throughout the life of the development, should permission be granted.

In the event that the Council grant permission for the development, a detailed CMP would be secured by Section 106 Legal Agreement for the demolition and construction phase of the development. This would include a consultation period with neighbours and allow for revisions or a revised traffic route to be agreed if possible. The revised Draft CMP has been prepared by Momentum.

Please feel free to contact Natalie Davies or Liam Lawson Jones of this office should you wish to discuss further.

Yours faithfully,

Gerald Eve LLP

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Encl.