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FAO: Colette Hatton

15 June 2021

Our ref: NFD/AKG/ACS/J6350

Your ref: PP-09856856

Dear Colette,

**Centre Point House, London WC2H 8AP
Listed Building Consent Application**

We write on behalf of our client, Almacantar Centre Point Nominee No.1 Limited and Almacantar Centre Point Nominee No. 2 Limited, as bare trustees for Almacantar Centre Point LP, to submit an application for listed building consent in respect of Centre Point House, London WC2H 8AP ('the site') for the following proposals:

“Installation of new bathroom ventilation system.”

The application relates to internal physical works at levels 3,4,5,6,7 and 8 and the external balcony soffits. The external work will not be visible in elevation or in views from the street.

Site and Surroundings

The site is located within the London Borough of Camden (LBC) within the designated Denmark Street Conservation Area.

The site is a Grade II listed building which comprises 36 apartments across the upper floors on levels 3-8. Various retail uses are permitted at ground, first and second floors of the building.

The Historic England listing citation states that the 'residential interiors lack special interest'. The citation goes on to state that in respect of the 'East Block' the 'maisonettes above, are without internal features of note and lack special interest'.

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 27 July 2020, listed building consent (2020/3071/L) was granted at the site for:

"Replacement of the doorsets to apartment nos. 1-36 on levels 3, 5 and 7 of Centre Point House."

Pre-Application Discussions

The proposals were discussed with the conservation officer and a meeting was held on 26 April 2020. Officers confirmed the proposals were acceptable in principle and that a listed building consent application should be submitted for determination.

Proposal

The ventilation proposal at Centre Point House is being brought forward in order to ensure that the bathroom ventilation system for the apartments complies with current fire regulations. These are considered essential in order to remove an identified risk to life at the site. This proposal has been discussed with you prior to submitting the Listed Building Consent application.

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 (2021) 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).

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

Fire Safety

New London Plan Policy D12 states that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that proposals are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire.

The applicant has been advised by FLOH that the current bathroom ventilation system at the site is not working correctly and now poses a fire risk and a risk to life. This application seeks listed building consent for a ventilation strategy that would ensure that the bathrooms within the residential units at the site are sufficiently and safely ventilated.

It is considered that the proposals fully comply with London Plan Policy D12 and to not proceed with the works would in fact be a contravention of this policy.

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.

As referenced above, the Historic England listed building citation for Centre Point House (ref: 1113172) states the residential interiors lack special interest'. The citation goes on to state that in respect of the 'East Block' the **'maisonettes above, are without internal features of note and lack special interest'**.

The exterior of the building is stated as having: "The upper level, placed above a set-back intermediary space, comprises a contrasting 6-storey section with 3 tiers of projecting rectangular balconies faced in grey geometric mosaic, alternating with sections of metal-framed curtain wall glazing with opaque glass panels beneath the windows. At either end of the block is a glazed stair compartment". The listing does not highlight any features of the exterior of the 'East Block' as having a special interest. The proposed openings to the base of the soffits will not affect the external appearance of the site (as demonstrated in the proposed elevations, prepared by FLOH) and are therefore considered to preserve the character and appearance of the listed building and will deliver essential upgrades to the safety features of the site, which is considered a significant public benefit.

The proposed works are essential in ensuring that the residential apartments within the listed building meet current fire safety regulations. The interior areas of the flats have been significantly updated over the course of time (as shown in the submitted photographs) and do not hold any special interest for the building.

The ventilation system is located along the upper floors of each apartment and will not be perceptible from the street as the exit point for the duct work is discretely located behind the balcony. The external works are to the balcony soffits only and will not be visible in the elevation or from public view. It is considered that this will not have any effect on the significance of the character and appearance of the listed building. The external and internal changes will not affect views of the site from the conservation area and street level and the internal changes will deliver an essential upgrade to the ventilation for the apartments.

The works have been designed to be sensitive to the heritage fabric and require minimal interventions. The new ventilation will be as discrete as possible whilst meeting the health and safety regulations. Therefore, it is considered that the proposals will not cause any harm to the appearance of the interior of the listed building which Historic England acknowledge in their listing citation lacks special interest.

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.

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 are essential to deliver a ventilation system to service the existing residential apartments which meet current fire safety regulations.

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. 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 and Access Statement prepared by FLOH Consulting;
- Heritage Note (included within this letter);
- Proposed Mechanical ventilation drawing pack prepared by FLOH Consulting;
- Typical existing plan, section and elevation drawings, prepared by FLOH Consulting
- Typical proposed plan, section and elevation drawings, prepared by FLOH Consulting;
- Schedule of Works, prepared by FLOH Consulting; and
- Existing site photographs.

There is no fee as this is a listed building consent application.

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

Yours faithfully,



Gerald Eve LLP

