



Town Planning Statement

55 Tottenham Court Road and 16-24 Whitfield Street, W1

On behalf of: Mayhunt Properties Limited

September 2023

GBR/KVA/U0023627

© copyright reserved 2023 Gerald Eve LLP

Contents

Page

Appendices

1	Introduction	3
2	Site and Surroundings	9
3	Planning History	12
4	Proposed Development	14
5	Planning Policy Context	17
6	Land Use	21
7	Design	30
8	Energy and Sustainability	42
9	Transport and Servicing	45
10	Amenity	50
11	S106, CIL and Planning Conditions	55

A	Planning History
---	------------------

1 Introduction

- 1.1 This Town Planning Statement has been prepared by Gerald Eve LLP on behalf of Mayhunt Properties Limited ('the Applicant'). It supports an application for full planning permission for the comprehensive refurbishment and extension of the Site for office use (Class E).
- 1.2 The existing building at 16-24 Whitfield Street and 55 Tottenham Court Road ('the Site') was designed by Colwyn Foulkes and Partners and completed in 2001 as a purpose-built police station for the British Transport Police, who have now departed the building.
- 1.3 The Site is dual-aspect with a retail frontage onto Tottenham Court Road, currently occupied by Marks and Spencer's Simply Food, with the former police station fronting onto Whitfield Street with ancillary office space spanning above over the retail unit. The former police station and ancillary office space is currently vacant, with strip out works continuing to take place.
- 1.4 The southern part of the building is four storeys high and the northern part of the Site, fronting onto Whitfield Street, is two storeys high and includes a small entrance to the ancillary office and two vehicular entrances into a ground floor loading bay and ramp down to a basement car park.
- 1.5 The Applicant is familiar with undertaking development within Camden, having recently completed the refurbishment of buildings within its ownership at Lynton House, 7-12 Tavistock Square and 22 Endell Street. The Applicant is also currently bringing forward proposals for a new office development at 100 Gray's Inn Road (ref. 2022/4259/P), which will provide both affordable housing and affordable workspace at the neighbouring building at 88 Gray's Inn Road.

- 1.1 In terms of 16-24 Whitfield Street and 55 Tottenham Court Road, following the submission of two planning applications last year by Aquila Holdings (refs. 2022/0568/P “Scheme A” & 2022/2626/P “Scheme B”), the Site was put on the market for sale and was acquired by the Applicant earlier this year. The former police station and office element of the building is currently vacant following police staff moving to alternative premises at Albany House, Broadway on 1 May 2022.
- 1.2 The Applicant has purchased the property with the intent of carrying out refurbishment and extension works so that the building can be improved, and office accommodation provided. It would ideally deliver the scheme which this application is seeking planning permission for, if this is not possible it would bring forward the extant extension permission (ref. 2022/2626/P).
- 1.3 In terms of its overall aspirations and similar to the permitted applications, the Applicant is seeking to retain and reuse the majority of existing building fabric, remove the basement level car parking, retain the ground floor retail unit, and replace the existing louvres with windows at the Tottenham Court Road frontage. It is also committed to delivering the 255 sqm of affordable workspace which was secured as part of the applications permitted last year (ref. 2022/0568/P “Scheme A” & 2022/2626/P “Scheme B”).
- 1.4 The following changes are now sought in addition to those already permitted at the site:
- A replacement office frontage on to Whitfield Street to provide a greater level of activation and relocation of the existing murals;
 - New, much improved façades on both the Whitfield Street and Tottenham Court Road frontages;
 - Additional massing and improved architecture at first to fourth floors resulting in an uplift of 601 sqm GIA when compared to permitted Scheme B (ref. 2022/2626/P). This is a total of 801 sqm GIA compared to the existing position;
 - New external terraces;
 - Urban greening and plant equipment at roof level.

1.5 The proposals have benefitted from three pre-application meetings with Camden Officers, which took place on 11 May 2023, 21 June 2023 and 12 July 2023. Following these meetings, the proposed design of the building has evolved, improving substantially. Changes include, amongst other things, reduction in size of first floor extension, alterations to the massing of the fourth-floor roof extension fronting Tottenham Court Road, a new, improved frontage with appropriate depth and detailing on Tottenham Court Road, changes to façade materials, a more intricately designed façade at Whitfield Street, and a rooftop plant enclosure benefitting from a bespoke design.

1.6 Extensive public consultation in respect of the Proposed Development has also been carried out, full details of which can be found within the accompanying Statement of Community Involvement, prepared by Kanda. Following the local interest in the development, particularly with regard the murals on the Whitfield Street ground floor frontage, it was decided to extend the consultation period and delay submission of the application.

1.7 The public consultation activity included:

- Hosting three meetings with local residents, community groups and Ward Councillors;
- Creating a project consultation website;
- Sending a letter via email to identified local stakeholders, community groups and Bloomsbury Ward Councillors; and
- Distributing two letters to circa 625 addresses in the vicinity of the Site.

1.8 Following the comments provided regarding the mural, a conditions survey was undertaken. This found that one is applied to a concrete wall and the other to blockwork, therefore they would both be able to be moved and relocated as single panels. The murals were a way of providing a blank frontage on to Whitfield Street given the previous use of the ground floor at this part of the building was as cells, a charge desk and identity / parade room. Given the change of use proposed, a more active frontage is now required. The Applicant agrees that the murals should be protected and therefore proposes that they are carefully removed and stored. Following which, once details of planned works to Crabtree Fields are known, they

could be re-provided within the park opposite the Site. We suggest that a Mural Protection Plan to secure this is included within a Section 106 agreement, should planning permission for this application be granted.

- 1.9 We are aware that Policy H2 of the Camden Local Plan supports the delivery of residential as part of schemes which result in an uplift of above 200 sqm GIA. This was the exact uplift of floorspace which extant Scheme B secured, to ensure that this requirement was not triggered. Section 9 of the accompanying Design and Access Statement provides a study outlining the optimum residential layouts which could feasibly be developed as part of this scheme. The delivery of 400.5 sqm of residential accommodation, which represents 50% of the total uplift, would result in four flats, all of which would be market rather than affordable. The inclusion of these would lead to more doors and blank frontages at ground floor level, whilst the flats themselves would be single aspect, dark, and not benefit from external space. They would therefore generally be of poor quality. Provision of residential flats would also impact the quality, and therefore value, of the office accommodation. A Financial Viability Assessment forms part of this application, setting out that the mixed-use office / residential scheme would return a profit of 7.87% on Gross Development Value. This is below both the typical target profit of 15% as well as extant Scheme B. Accordingly, unlike its current application at 100 Gray's Inn Road, the Applicant does not propose housing as part of these proposals. A payment in lieu of £325,750 is proposed, which the FVA considers is the maximum amount which the scheme can afford.
- 1.10 The scheme incorporates 255 sqm GIA of affordable workspace split across ground and basement levels. This would be marketed at a 50% discount for a 10-year period.
- 1.11 Despite this proposal only securing a similar financial return as extant Scheme B, it is the Applicant's preference to deliver this scheme given the improved design, environmental credentials and marketability which it would deliver.
- 1.12 As such, full planning permission is sought for:

“Partial demolition; removal of basement car parking, ramp and vehicle dock; change of use to offices (Class E); extensions at first, second, third and fourth floors to provide additional office (Class E) floorspace; new replacement façades at Whitfield Street and Tottenham Court Road elevations; partial new replacement facades at north and south elevations; rooftop plant equipment, PV panels and green roof; external amenity areas at first, second, third and fourth floors; and associated external alterations”.

1.13 This Town Planning Statement assesses the Proposed Development in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the statutory duties found in Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

1.14 The public benefits arising from the scheme, both in itself and when compared against Extant Scheme B, are explained throughout this Statement and are summarised as follows:

- The provision of high-quality, office floorspace which would support job creation in the Central London Area and Central Activities Zone, and meet an identified local and London-wide need for such floorspace;
- Inclusion of 255 sqm GIA affordable workspace;
- The delivery of a scheme providing a higher-quality building in terms of design;
- Improved public realm as part of pavement widening on Whitfield Street;
- Urban greening and on-site energy generation; and
- The provision of significant Community Infrastructure Levy contributions and financial contributions to be secured through a Section 106 agreement.

1.15 Accordingly, we consider that this application should be granted planning permission.

Application Documentation

1.16 This Town Planning Statement, which includes draft Section 106 Heads of Terms, should be read alongside the following documentation:

- Planning Application Form, prepared by Gerald Eve LLP;
- CIL Form, prepared by Gerald Eve LLP;
- Site Location Plan, prepared by Halebrown Architects;
- Existing, Demolition and Proposed Plans, Sections and Elevations, prepared by Halebrown Architects (as requested by Officers, these include 1:20 detailed drawings);
- Design and Access Statement (including servicing), prepared by Halebrown Architects;
- Townscape, Heritage and Visual Impact Assessment, prepared by JL Heritage and included within the Design and Access Statement;
- Daylight and Sunlight Assessment, prepared by GIA;
- Energy and Sustainability Statement (including BREEAM pre-assessment), prepared by TPS;
- Financial Viability Assessment, prepared by Gerald Eve LLP;
- Noise Impact Assessment, prepared by Venta Acoustics; and
- Statement of Community Involvement, prepared by Kanda.

2 Site and Surroundings

- 2.1 The Site measures approximately 1,330 sqm (0.133 hectares) and fronts both Whitfield Street and Tottenham Court Road. It is located within the Bloomsbury ward within the London Borough of Camden.
- 2.2 The Site is also located within the Central Activities Zone, the Charlotte Street Conservation Area and Camden's Knowledge Quarter.
- 2.3 The Site is very well connected to public transport and has a PTAL rating of 6b, the highest possible rating. It is a 5-minute walk from Goodge Street Underground Station to the north, which is on the Northern Line, and a 6-minute walk to Tottenham Court Road Underground Station to the south, which serves the Central Line, Northern Line and Elizabeth Line. There are also numerous bus routes running along Tottenham Court Road and a numerous Santander cycle stations in close proximity.
- 2.4 The existing building was designed by Colwyn Foulkes and Partners and completed in 2001 as a purpose-built police station for British Transport Police.
- 2.5 The lawful existing use of the Site is Class E at the section of the basement, ground and first floor which fronts Tottenham Court Road, which is a retail unit, and *Sui Generis* Police Station and ancillary office use for the rest of the building. However, recent planning permissions have secured the change of use of the *Sui Generis* floorspace to Class E offices.
- 2.6 The surrounding area is characterised by a mixture of uses, including commercial and residential uses. The closest residential properties to the Site are located at:
 - 1 Crabtree Place
 - 53-54 Tottenham Court Road
 - 12-14 Whitfield Street
 - 62 Tottenham Court Road
 - 5-7 Goodge Street

- 9 Goodge Street
- 11 -13 Goodge Street
- 15-17 Goodge Street
- 26-28 Whitfield Street

- 2.7 The building is dual-aspect with a retail frontage onto Tottenham Court Road, currently occupied by Marks and Spencer's Simply Food, with the former police station fronting onto Whitfield Street with ancillary office space spanning above over the retail unit. The former police station and ancillary office space is currently vacant.
- 2.8 The existing building is made up of two volumes. The southern volume is four storeys high with a setback plant enclosure and the existing roof that is low-profile metal standing seam with a central metal clad plant enclosure. The northern volume, fronting onto Whitfield Street, is two storeys high and includes a small entrance to the ancillary offices and two vehicular entrances into a ground floor loading bay and ramp down to a basement car park.
- 2.9 The existing Tottenham Court Road elevation is composed as large, vertical brick bays with louvred and glazed infills. The facade is dominated by first floor louvres serving the plant space for the ground floor retail unit. Additionally, the brick reveals are shallow and lack detail and the facade generally has limited depth or visual interest with plain, rendered spandrel panels. The third floor is faced in low-quality reconstituted stone panelling and the windows at this level also have an odd relationship with the internal space with an unusually high sill, due to the spandrel infill. At ground floor, the facade is almost entirely shop frontage for Marks & Spencer, which is not proposed to be altered as part of this application.
- 2.10 In respect of the existing Whitfield Street elevation, the facade is defined as 2no. distinct volumes at high level, linked with a ground floor, stone-clad plinth. The larger, 4no. storey volume is largely clad in the same brick as Tottenham Court Road, but has smaller, punched windows. The smaller part of the building is finished in painted render and has weathered poorly. The street level has limited permeability with most of the ground floor either solid material or obscured glazing, mainly due to the previous use of the building and the need for security. The existing pedestrian entrance from Whitfield Street is small and quite

unassuming. There are also two vehicular entrances into a ground floor loading bay and to a vehicle ramp down to a basement car park on this elevation.

2.11 Whilst the Marks and Spencer's Simply Food store is accessed and serviced from Tottenham Court Road, all pedestrian and vehicular access to the application premises is from Whitfield Street.

2.12 On the Whitfield Street elevation, the building overlooks Crabtree Fields, which was laid out in 1985 by the Greater London Council replacing a former car park. The public gardens recall the old name of the area in the early eighteenth century when it was a meadow known as Crab Tree Field. Crabtree Fields is surrounded by mainly residential use with a mixture of small, terraced houses and modern flats lining all three sides. We understand that much-needed improvement works are currently being planned for the park.

2.13 The Site is not listed, nor is it a positive contributor to the Charlotte Street Conservation Area, but there are listed buildings in proximity including:

- 1 Colville Place (Grade II), to the east of the Site;
- 11, 11A, 12 and 13 Colville Place (Grade II), to the east of the Site;
- 14, 15 and 16 Colville Place (Grade II), to the south-east of the Site;
- 26 and 28 Charlotte Street (both Grade II), to the south-east of the Site;
- The Rising Sun Public House (Grade II), to the south of the Site; and
- 2-8 Goodge Street (Grade II), to the north of the Site.

2.14 The Site is also subject to the following designations in the Camden Local Plan Policies Map:

- Tottenham Court Road CLF Primary Frontage;
- Tottenham Court Road CLF Local Plan Centre; and
- London View Management Framework Protected Vista 2B.1 Parliament Hill Oak Tree to Palace of Westminster.

3 Planning History

- 3.1 A review of the London Borough of Camden’s online planning history search has been undertaken and the Site’s relevant planning history is summarised in this Section. The examination of the planning records has revealed comprehensive history for the Site, the most relevant of which is summarised below.
- 3.2 On 20 November 2000, planning permission was granted (ref. PS9904472) for:
- “Redevelopment of the site to form a mixed use development with a British Transport Police Station and headquarters Building on basement, ground and first to third floors (both sui generis use), with pedestrian and vehicular entrances on Whitfield Street, together with Class A1 retail use on the basement, ground and first floors of the Tottenham Court Road frontage, with plant on the first and fourth floors, as shown by drawing numbers (a) 9445/1-4 and L277/P(0)/100A, 101, 102B, 103A, 104A, 105A, 106A, 108A, 109A, 110A, 111A, 112 and all documents and letters listed in the Schedule of documentation dated 24 February 2000.”**
- 3.3 This development was carried out and is the building which is currently at Site, though the British Transport Police has now departed the property.
- 3.4 Permission ref. PS9904472 was granted subject to 14 conditions, but only one relates to ongoing use; namely condition 11 which restricts the use of the basement car park to operational vehicles.
- 3.5 London Borough of Camden’s online planning history search also includes the approval of condition applications in respect of permission ref. PS9904472. These additional permissions can be found within the planning history table at appendix A.
- 3.6 Two separate applications were submitted and permitted in 2022 on behalf of the previous owner, ahead of them seeking to sell the building.

3.7 On 27 October 2022, planning permission was granted (ref. 2022/2626/P) for the following:

“Extensions at second floor and fourth floor levels to provide commercial (Class E) floorspace, new external plant area and external amenity areas at third and fourth. Alterations to Tottenham Court Road elevation involve installation of double-glazed aluminium windows and grey aluminium panels at first floor following the removal of ventilation grills. Removal of existing plant room at fourth floor level and associated alterations.”

3.8 This application proposed extensions at second and fourth floor levels to provide additional office floorspace, new external plant and amenity areas at the third and fourth floors. As part of this application, 40 sqm GIA was offered as affordable workspace – at a 50% rental discount for a 10-year period.

3.9 On 7 November 2022, planning permission was granted (ref. 2022/0568/P) for the below.

“Change of use of existing British Transport Police station and offices (Sui Generis) to Offices within Use Class E(g)(i) including removal of basement car parking, ramp and vehicle dock.”

3.10 No floorspace additional to the existing 3,864 sqm was sought as part of this particular application and it was agreed that there was no policy requirement to provide a replacement community use given that operational police staff had already departed the building and employment use at the Site was welcomed. It was also agreed that 20% of the former police station area at the ground and basement should be provided as affordable workspace (215 sqm at a 50% rental discount for a period of ten years) but that this should not be applied to upper areas which were essentially previously used as offices.

4 Proposed Development

4.1 The key details of the Proposed Development are summarised in this section of the Statement. This section should be read in conjunction with the Design and Access Statement and application drawings, prepared by Halebrown Architects.

4.2 Full planning permission is sought for:

“Partial demolition; removal of basement car parking, ramp and vehicle dock; change of use to offices (Class E); extensions at first, second, third and fourth floors to provide additional office (Class E) floorspace; new replacement façades at Whitfield Street and Tottenham Court Road elevations; partial new replacement facades at north and south elevations; rooftop plant equipment, PV panels and green roof; external amenity areas at first, second, third and fourth floors; and associated external alterations”.

4.3 The Proposed Development encompasses the following:

- Change of use from *Sui Generis* Police Station and ancillary office use to offices (Class E);
- Partial demolition of the building, including facades, vehicular access ramp, first floor plant area, first floor flat roof and fourth floor rooftop plant enclosure;
- Partial extension of first, second and third floors on the Kirkman Place elevation;
- Additional storey created through fourth floor extension, set back on the Whitfield Street elevation;
- Creation of roof terraces at first to fourth floor levels;
- Replacement of the majority of façade brickwork;
- Installation of replacement facades on Whitfield Street and Tottenham Court Road including decorative features such as parapet detailing and stone window reveals;
- Installation of additional windows and louvres to north elevation;
- Creation of terrace and loggia balconies fronting the Whitfield Street elevation;

- Public realm improvements through the removal of street furniture, pavement cut ins, cobbled paving, dropped kerb and signage associated with the police station use and creating a wider pavement for pedestrian use;
- Creation of office floorspace, affordable office workspace and associated facilities, cycle store and refuse store at ground floor level;
- Creation of end of trip facilities at basement level, accessed via a stair from the ground floor cycle store, which include showers and changing rooms
- Creation of office floorspace, affordable workspace, facility management office and associated facilities at basement level;
- Relocation of majority of existing first floor roof plant equipment to roof level;
- Creation of roof top plant enclosure; and
- Installation of PV panels and green roof at roof level; and
- Installation of biodiverse features to roof terraces including planters and sedum and wildflower roofs.

4.4 The total uplift of the Proposed Development is 801 sqm GIA. The existing and proposed land uses are detailed in Table 1, below.

Table 1 - Areas

Land Use (Use Class)	Existing sqm GIA	Proposed sqm GIA	Change sqm GIA
Retail (Class E)	1,640 sqm	1,383 sqm	-257 sqm
Police Station (<i>Sui Generis</i>)	3,878 sqm	0 sqm	-3,878 sqm
Office (Class E)*	0 sqm	4,936 sqm	+4,936 sqm
Total	5,518 sqm	6,319 sqm	+801 sqm



*Including 255 sqm GIA of affordable workspace.

5 Planning Policy Context

5.1 The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 comprises:

- The London Plan (2021);
- The Camden Local Plan (2017); and
- The Camden Site Allocations Plan (2013).

5.2 The National Planning Policy Framework (“NPPF”) and National Planning Practice Guidance (‘NPPG’) are both material considerations.

Statutory Tests

5.3 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.

5.4 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

National Planning Policy and Guidance

5.5 The National Planning Policy Framework (‘NPPF’) sets out the Government’s economic, environment and social planning policies for England and supersedes the vast majority of Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs). It summarises in a single document all previous national planning policy advice. Taken together, these policies articulate the Government’s vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.

National Guidance – Planning Practice Guidance (as updated to 2022)

- 5.6 In March 2014, the Government launched the web-based Planning Practice Guidance ('PPG'). This aims to provide guidance which is useable in an up-to-date and accessible manner.
- 5.7 The PPG outlines how Government planning practice should be followed and interpreted in accordance with the principles of the NPPF. Regarding decision making, the guidelines set out in the PPG are a material consideration and accordingly should carry weight in the determination of planning applications.

Regional Planning Policy - London Plan (2021)

- 5.8 The London Plan 2021 is the overall strategic plan for Greater London, which includes the 32 Boroughs and the City of London. The aim of the London Plan is to set out an overarching framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 to 25 years. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the statutory development plan.
- 5.9 This high level, over-arching vision is supported by detailed objectives that will lead to the Mayor's vision of 'Good Growth'. These objectives include:
- Building strong and inclusive communities;
 - Making the best use of land;
 - Creating a healthy city;
 - Delivering the homes Londoners need;
 - Growing a good economy; and
 - Increasing efficiency and resilience.

Local Planning Policy – The Camden Local Plan (2017)

- 5.10 The Camden Local Plan adopted in July 2017 sets out how development will be managed within the Borough. The Plan seeks to address several challenges; adapting to Camden's

growing population and to social change, the supply and cost of housing in the Borough, maintaining a successful economy and improving opportunities, inequalities, health and wellbeing, improving transport, quality of the environment and crime and safety.

5.11 To address these challenges, the Plan sets three key objectives:

- (1) Developing new solutions with partners to reduce inequality and improve health and wellbeing;
- (2) Creating conditions for and harnessing the benefits of economic growth;
- (3) Investing in communities to ensure sustainable neighbourhoods.

5.12 The Council's objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for our residents and businesses. The Plan aims to deliver sustainable growth while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit.

Emerging Local Planning Context

5.13 LBC is in the process of reviewing the Camden Local Plan (2017) and the Site Allocations Local Plan. A call for views on the updated Local Plan was carried out between 4 November 2022 and 13 January 2023. The responses received during this engagement will feed into the preparation of the LBC's draft Local Plan, which is anticipated to be published for consultation in late 2023.

Other Material Considerations

5.14 Supplementary Planning Guidance and Documents which are a material consideration in the determination of this application include the following:

- Mayor of London's 'Be Seen' Energy Monitoring Guidance (2021);
- Mayor of London's Energy Planning Guidance (2022);

- Mayor of London’s Whole Life-Cycle Carbon Assessments Guidance (2022);
- Mayor of London’s Circular Economy Guidance (2022);
- Mayor of London’s Accessible London SPG (2014);
- Mayor of London’s Character and Context SPG (2014);
- Mayor of London’s London View Management Framework SPG (2012);
- Mayor of London’s Control of Dust and Emissions During Construction SPG (2014);
- Mayor of London’s Optimising Site Capacity: A Design-led Approach LPG (2023);
- Mayor of London’s Urban Greening Factor (UGF) Guidance (2023);
- Mayor of London’s Air Quality Positive LPG (2023);
- Mayor of London’s Air Quality Neutral LPG (2023);
- Mayor of London’s Sustainable Transport, Walking and Cycling Guidance (2022);
- Camden Planning Guidance – Design (2021);
- Camden Planning Guidance – Artworks, Statues and Memorials (2019);
- Camden Planning Guidance – Access for All (2019);
- Camden Planning Guidance – Employment Sites & Business Premises (2021);
- Camden Planning Guidance – Energy Efficiency and Adaptation (2021);
- Camden Planning Guidance – Town Centres and Retail (2021);
- Camden Planning Guidance – Amenity (2021);
- Camden Planning Guidance – Air Quality (2021);
- Camden Planning Guidance – Transport (2021);
- Camden Planning Guidance – Developer Contributions (2019); and
- Camden Planning Guidance – Water and Flooding (2019).

6 Land Use

- 6.1 This section of the Statement assesses the proposed land uses and their acceptability, in principle, in planning policy terms.

Commercial Office (Class E) Policy Context

- 6.2 The NPPF sets out the Government's commitment to securing economic growth and advises that planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Paragraph 81 specifies that significant weight should be placed on supporting economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 6.3 Policy SD5 of the London Plan states that offices and other CAZ strategic functions are to be given greater weight relative to new residential development at this location in the CAZ.
- 6.4 At the local level, LBC Local Plan Policy E1 explains that the Council will secure a successful and inclusive economy by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. To do so, the policy says the Council will, among other things, support and promote the development of the Knowledge Quarter and direct office development to the Central London Area.
- 6.5 Policy E2 of the Local Plan sets the policy context for the provision of new employment premises in the Borough. More specifically, the wording of the policy states that LBC will consider a higher intensity redevelopment of sites that are considered suitable for continued business on the following conditions, among others:
- i. the level of employment floorspace is increased or at least maintained;
 - ii. the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;
 - iii. the scheme would increase employment opportunities for local residents, including training and apprenticeships;

iv. the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the Site.

6.6 Policy C2(g) of the Local Plan states that the Council will seek to ensure existing community facilities are retained recognising their benefit to the community, including protected groups, unless one of the following tests is met:

i.a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users;

ii.the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a community use, then our preferred alternative will be the maximum viable amount of affordable housing.

Office (Class E) Assessment

6.7 The Proposed Development would see the change of use of 3,878 sqm GIA of *Sui Generis* Police Station and ancillary office use floorspace to Class E office, which is already subject to an extant permission.

6.8 The Proposed Development would also deliver an uplift of 801 sqm floorspace (601 sqm uplift compared to approved Scheme B), all of which would be used for Class E office use. The Proposed Development would therefore provide a total of 4,936 sqm GIA Class E office floorspace.

6.9 For the avoidance of doubt, there is no change of use proposed to the existing ground floor retail unit. The existing 257 sqm GIA of retail back of house plant room on the first floor would change to office use, with the plant equipment being consolidated, with the majority relocated to the roof.

- 6.10 In terms of loss of the police station use, the British Transport Police moved to alternative premises at Albany House, Broadway on 1 May 2022, leaving this part of the Site vacant. There are no plans for any other branch of the Police to occupy the Site and there is no policy requirement to provide a replacement community use. This was confirmed in the Committee Report for application ref. 2022/0568/P.
- 6.11 Clearly, there is the need for a change of use of the Site to an appropriate use to ensure a new tenant can occupy the Site.
- 6.12 The Site is located within the CAZ and Central London Area, and the Knowledge Quarter. As such, the delivery of high-quality employment space is supported at all policy levels.
- 6.13 To support Local Plan Policy E1 and E2, Camden's Draft Site Allocations Local Plan Policy KQ1(f) seeks to ensure that at least 20% of additional floorspace in the Knowledge Quarter is affordable workspace. However, as outlined in Camden's Employment Sites and Business Premises CPG (2021), this Policy is triggered when a development provides 1,000 sqm GIA or more of employment floorspace. The Proposed Development provides a total uplift of 801 sqm of employment floorspace.
- 6.14 The Applicant is committed to providing the 255 sqm of affordable workspace which was secured cumulatively as part of Schemes A and B (ref. 2022/0568/P and 2022/2626/P).
- 6.15 The affordable workspace would be located at ground and basement levels and would be offered at a 50% discount for a 10-year period. This is in line with what was secured via the Section 106 Agreement of permission refs. 2022/0568/P and 2022/2626/P combined.
- 6.16 As part of Scheme A (ref. 2022/0568/P), the Committee Report confirms that the 215 sqm affordable workspace offer (representing 20% of the former police station area at the ground and basement) is considered as a reasonable contribution related to the scale and nature of the proposal, given that it is only these lower floors which are being intensified as the upper floors are essentially already akin to office use.

6.17 Scheme B (ref. 2022/2626/P) secured a further 40 sqm of affordable workspace beyond what was approved as part of Scheme A at ground floor level.

6.18 The Financial Viability Assessment, produced by Gerald Eve LLP, demonstrates why this affordable workspace offer is suitable in the context of the overall scheme viability and cannot be increased.

Mixed Used Policy and Residential (Class C3) Context

6.19 Policy SD5 of the London Plan states that offices and other CAZ strategic functions are to be given greater weight relative to new residential in all other areas of the CAZ.

6.20 Policy H2 of the Local Plan aims to maximise housing supply and seeks to achieve commensurate levels of self-contained housing whenever non-residential development is proposed to ensure a balance of uses across the Borough. The policy requires that where more than 200sqm GIA of non-residential development is proposed in the Central London Area, 50% of the additional floorspace will be required to be delivered as self-contained housing with an appropriate mix, including affordable housing where relevant. Policy H2 also states that, where housing is required as part of a mix of uses, Camden will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. The requirement to deliver affordable housing on Site is subject to a set of criteria which is set out at Policy H4 of the Local Plan and the Housing CPG.

6.21 Policy H4 sets out the Council's approach to affordable housing provision which is based on a site's capacity to provide housing, with affordable housing being required on a sliding scale between 2% and 50%.

6.22 The Housing CPG provides detailed guidance on calculating a site's capacity to provide housing, along with a split between market and affordable.

Mixed Use Policy and Residential (Class C3) Assessment

- 6.23 The Proposed Development seeks to provide an uplift of 801 sqm GIA of non-residential floorspace, thus generating a residential floorspace requirement of 400.5 sqm GIA under Local Plan Policy H2.
- 6.24 Whilst the Proposed Development proposes less than 1,000 sqm GIA of additional floorspace, during the course of pre-application discussions with the LBC, the Applicant considered whether it would be possible to provide residential use on site as required under Policy H2. As part of this exercise, a detailed study was undertaken (see Section 9 of the Design and Access Statement), which was based on a total uplift of 801 sqm GIA and required 400.5 sqm (50%) of residential floorspace, equating to 4 residential units. Two alternative layouts for the residential floorspace have been analysed.
- 6.25 The study identified that the provision of residential uses on-site would result in the following issues:
- Most flats would only be single aspect;
 - Flats would have poor quality or limited opportunities for outside amenity space;
 - Poor privacy to the flats as they would be overlooked by office accommodation;
 - High levels of noise and air pollution from busy Tottenham Court Road elevation;
 - No possibility of residential entrance and core onto Tottenham Court Road due to existing retail frontage;
 - South elevation solid party wall onto Whitfield Street;
 - Limited entrances to Whitfield St elevation due to requirement for large commercial entrance and affordable workspace requirement;
 - Potential overlooking to existing residential uses;
 - Lack of ability to provide active and well considered frontage to Whitfield Street elevation due to increase in number of entrances required;
 - Compromised quality of the office space due to receiving less daylight;
 - Compromised office layout; and

- Acoustic separation between office floorplate and residential flats would be challenging due to the existing slab being retained.

6.26 The Proposed Development is considered against the criteria within Policy H2 below and it is concluded that provision of residential use on-site should not be required in this particular instance.

6.27 **Part A, the character of the development, the site and the area** – in terms of the character of the Proposed Development, the proposals are seeking to deliver quality office space within the CAZ, Central London Area and the Knowledge Quarter which will attract valued occupiers to Camden and support the strategic function of London’s role as an economic centre and competitiveness in the world market. The upper floors of the existing building have been used as ancillary offices since the building was constructed and it is sought to retain this character by retaining a commercial use in the upper floors of the building. It is felt that the commercial use of the building would help to reinforce the character of the area by providing quality office floorspace within the heart of the CAZ, Central London Area and the Knowledge Quarter.

6.28 **Part B, constraints on developing the site for a mix of uses** – as demonstrated within the Design and Access Statement and summarised above, providing any amount of residential use within the building would lead to poor quality homes as well as other physical constraints associated with working with the existing building.

6.29 Additionally, due to the low number of units that could be incorporated, the units would all be private as the affordable housing threshold would not be met.

6.30 The above options have been assessed from a viability perspective. The supporting Financial Viability Assessment (FVA), prepared by Gerald Eve LLP, also demonstrates that the on-site delivery of housing is not financially viable.

- 6.31 **Part D, whether housing would be compatible with the character and operational requirements of the proposed non-residential use** – as demonstrated in the Design and Access Statement and summarised above, it would not be possible to locate a residential entrance and core on the Tottenham Court Road due to the existing retail frontage. Additionally, there would only be a small part of the Whitfield Street elevation that would be suitable for the residential entrance. The residential units would also have poor privacy as the flats would be overlooked by office accommodation.
- 6.32 **Part F, providing an active frontage** – as noted above, it is not possible to locate a residential entrance on the Tottenham Court Road elevation due to the existing retail frontage. Providing the residential entrance on the Whitfield Street elevation would lead to the reduction of active office frontages.
- 6.33 **Part H – the impact of a mix of uses on the efficiency and overall quantum of development** – the provision of residential floorspace in this location would decrease the quality and quantity of office floorspace in the CAZ, Central London Area and Knowledge Quarter. A further core would be needed to facilitate this additional use and would mean that the overall gross to net efficiency of the overall floorspace would reduce. The residential layout would also be inefficient given that only two flats would be provided off the core at first and second levels. The efficiency of the residential element would therefore also be low.
- 6.34 **Part I - the economics and financial viability of the development including any particular costs associated with it having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing** - The Financial Viability Assessment (FVA) , prepared by Gerald Eve LLP, concludes that the introduction of residential use at the Site would have cost implications that lead to a viability deficit when compared to extant Scheme B and therefore cannot be supported by the development.
- 6.35 The FVA concludes that the Proposed Development would lead to a 15% profit where a £325,750 payment in lieu of residential delivery is provided. The FVA also includes scenario sensitivity calculations which concludes that, if residential use were to be introduced, the

profit return on GDV would be 7.87%, making the scheme unviable compared against the permitted position. This sensitivity illustrates that the office/residential scheme is more unviable both than the extant and proposed scheme, meaning that it would not be deliverable. The FVA concludes that providing on-site housing is not a viable or practical option for this Site, but the Applicant is instead willing to make the maximum reasonable payment in lieu contribution of £325,750.

6.36 Part J, whether an alternative approach could better meet the objectives of the Local Plan

– it is considered that a wholly commercial scheme is in accordance with the character and established uses within the surrounding area. The comprehensive internal refurbishment would be supplemented by a modest roof extension. The Proposed Development is clearly in accordance with Local Plan Policies E1 and E2 which support new and improved office floorspace the CAZ.

6.37 In light of the above and in the context of Local Plan Policy H2, it is considered that the provision of on-site housing is not possible. As set out in the FVA, the provision of housing as part of the development would not only detrimentally impact the quality of commercial floorspace, while delivering substandard residential accommodation, it would also lead to an unviable scheme, particularly when compared against a scheme already permitted. This is due to the modest uplift in commercial floorspace proposed and the overall cost of a major refurbishment. It is therefore concluded that the provision of residential on-site is not possible in the context of Local Plan Policy H2.

6.38 The Applicant does not have alternative landholdings close to the Site and the delivery of housing off-site is not possible.

6.39 For the reasons identified above, it is considered that the Proposed Development represents an exceptional circumstance. Policy H2 states that, in an exceptional circumstance such as this, a payment-in-lieu of the delivery of housing will be required. Using example 1.1 contained in the Housing CPG, 2021, Table 2 sets out the mixed-use residential requirement associated with the proposal.

Table 2: Mixed Use Calculation

Total additional floorspace proposed	801 sqm
Self-contained housing floorspace target	400.5 sqm
On-site self contained housing proposed	0 sqm
Self-contained housing shortfall	400.5 sqm
Payment-in-lieu (PIL) for housing (shortfall in sqm x £1,500)	£600,750

6.40 As outlined above, the FVA demonstrates that the proposed office refurbishment and extension could not viably support the provision of the full PiL contribution towards residential use and could only afford a payment of £325,750. This figure is included within the draft Section 106 Heads of Terms which are set out later in this report.

7 Design

- 7.1 This section of the Statement assesses the proposal against relevant design planning policies contained in national and local planning policy documents. Further details on the design can be found in the submitted Design and Access Statement, prepared Halebrown Architects.

Design Policy Context

- 7.2 The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 126 states good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Paragraph 130 of the NPPF states that planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, be visually attractive as a result of good architecture and effective landscaping, be sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site and create safe places.
- 7.3 London Plan Policies D1 to D3 apply to the design and layout of the development and set out a range of urban design principles relating to the quality of the public realm, the provision of convenient, legible movement routes and the importance of designing out crime by maximising the provision of active frontages.
- 7.4 Policy D5 of the London Plan states that development proposals should achieve the highest standards of accessible and inclusive design and that proposals should deliver high quality people focused spaces, which are convenient and welcoming with no disabled barriers.
- 7.5 London Plan Policy HC4 (London View Management Framework) seeks to ensure that all development does not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.
- 7.6 At a local level, Policy D1 of the Camden Local Plan seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use. The

policy lists what characteristics LB Camden will expect to achieve this policy objective including requiring development to respect local context and character, preserves or enhances the historic environment and is of sustainable and durable construction.

- 7.7 LBC has also published a Planning Guidance CPG (January 2021) which establishes design principles to be used in the assessment of development proposals. The document reinforces or where necessary amplifies existing guidance and defines the Council's expectations for new buildings, as positive and enduring additions to this unique urban landscape.

Heritage Policy Context

- 7.8 A full analysis of the impact of the Proposed Development on designated heritage assets is included within the Townscape, Heritage and Visual Impact Assessment ('THVIA'), prepared by JL Heritage and included within the Design and Access Statement. JL Heritage has been engaged from early inception of the scheme to guide and advise on heritage and townscape matters.
- 7.9 Section 66 of the 1990 Planning (Listed Buildings and Conservation Areas) Act 1990 provides that decision makers are required to have "special regard" to the desirability of preserving listed buildings and their settings.
- 7.10 The Government has attached great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made based on the significance of the asset, and the harm (substantial or less than substantial) that the proposals would cause to the significance of the heritage asset.
- 7.11 Paragraph 194 of the NPPF states that that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be

proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

7.12 Paragraph 197 of the NPPF 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 vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

7.13 Paragraph 199 of the NPPF states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation. It notes that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

7.14 Paragraph 200 states that any harm, of loss of, the significance of a designated heritage asset should require clear and convincing justification and that substantial harm to, or loss of grade II listed buildings should be exceptional.

7.15 Paragraph 201 notes that where a Proposed Development will lead to substantial harm, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits.

7.16 In Paragraph 202, the NPPF states that where a development proposal will lead to '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.

- 7.17 London Plan Policy HC1 states that development proposals affecting heritage assets, and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 7.18 Camden Local Plan Policy D2 states that the Council will preserve and where appropriate enhance Camden's heritage assets and their settings. In relation to conservation areas, the policy says that the Council will take into account of Conservation Area Statements, Appraisals and Management Strategies.
- 7.19 Regarding heritage, the Design CPG sets out that, inter alia, the Council will take account of the desirability of sustaining and enhancing heritage assets and putting them to viable uses consistent with their conservation.

Design Assessment

- 7.20 The application proposes additional office floorspace through an extension to the existing building, together with improvements to the facades, new external terraces, landscaping, new plant equipment, cycle parking spaces and other associated works.
- 7.21 At the beginning of the design process, Halebrown identified that there are substantial opportunities to refurbish and improve the existing building and also improve the design above what was approved in 2022 to provide high-quality commercial floorspace.
- 7.22 As well as weathering poorly, the existing Tottenham Court Road elevation is dominated by louvres and has small windows, with the façade generally lacking depth and visual interest meaning that it does not relate well to its surrounding context. The existing Whitfield Street elevation has also weathered poorly. There are also opportunities to modernise and improve the retail plant space at first floor level.

- 7.23 It was considered that an improved refurbishment and extension scheme could address the existing issues and opportunities, whilst performing better in terms of design, sustainability and building usability.
- 7.24 A refurbishment scheme was chosen over a redevelopment scheme as it would be far more sustainable. By retaining most of the existing superstructure (steel frame plus concrete slabs), a significant amount of carbon and embodied energy is saved. Additionally, as there will be reduced demolition of the existing building, there will be less disruption to the retail unit at ground level, which will remain open for business for the duration of the construction period. In total, 97% of the existing floor slabs would be retained.
- 7.25 The design of the building seeks to respond to the rich architectural language within the local built environment. Design clues which have been taken from nearby buildings include the use of light-coloured brick, stone lintels, masonry details and soldier stack brick bonding at coping and stone surrounds to the windows.
- 7.26 The proposed refurbishment and extension of the building would see increased massing at first and second floor level on the Kirkman Place elevation to bring it in line with the existing massing of the building. At third floor level, the Kirkman Place elevation would also include increased massing, which would make the volumes more rational. At fourth floor level, increased massing would provide an extra storey, pulled back from the floor below on the Whitfield Street elevation to create a step in the building height.
- 7.27 Whilst the building height is increasing, it still sits well below the threshold plane of the London View Management Framework (LVMF) protected vista 2B.1 (Parliament Hill at the prominent oak tree to the Palace of Westminster), which is circa 57 metres AOD at the Site. The application is therefore compliant with London Plan Policy HC4.
- 7.28 On the Tottenham Court Road elevation, the proposals include light coloured brick, stone lintels, masonry details and soldier stack brick bonding at coping, PPC metal framed glazing

and stone surrounds to the windows. This has been informed by analysing the architecture along Tottenham Court Road.

- 7.29 On the Whitfield Street elevation, the proposals include wet-cast stone lintels to match brickwork, wet-cast stone fins and spandrels to the pavilion, PPC metal framed glazing, feature masonry details and soldier stack brick bonding at coping and metal grill framed glazing.
- 7.30 At this frontage, the smaller volume part of the building would feature a roof terrace and loggia balconies which would provide views across Crabtree Fields Park.
- 7.31 On the Kirkman Place elevation, the elevation is to be mostly retained on the lower floors and rebuilt on the upper floors where there is the new fourth floor extension. On the lower floors, windows are to be replaced and new openings would be introduced to the existing window openings to accommodate new louvres for the floor-by-floor servicing strategy. On the third floor, the windows are to be reconfigured and dropped on the Kirkman Place elevation to create full-height access doors onto a new roof terrace, which replaces an existing metal roof. The windows and masonry would be designed to match those on the Tottenham Court Road and Whitfield Street elevations.
- 7.32 On the north elevation, several small extensions are proposed at lower floors and new masonry would be introduced on the upper floors where the new fourth floor extension is proposed. On the first floor, the reconfigured retail plant equipment requires a louvred enclosure to provide the required ventilation. On the second and third floors, new extensions incorporate extended windows with new high-level louvres windows to accommodate ventilation for the floor-by floor servicing strategy. The proportions of the new windows are designed to closely match the window proportions to the Tottenham Court Road and Whitfield Street elevations. At fourth floor the new masonry would be selected to closely match the existing masonry with new windows with new 'ghost' windows to the eastern gable wall to provide visual interest.

- 7.33 Internally, at ground floor level, there would be an office reception to the south to link with the existing main vertical circulation core as well as a duplex office unit adjacent to reception with void cut-out to Whitfield Street side to provide stair down and daylight to basement. Affordable workplace provision is also accessed from the ground floor with a dedicated entrance from Whitfield Street and void cut-out to access basement. The cycle store would be accessed from ground floor and the refuse store would be relocated to ground floor with doors to access from Whitfield Street.
- 7.34 At basement level, the existing ramped car park access would be removed and replaced with office space and end of trip cycle facilities would be located in the basement accessed via stairs from the ground floor cycle stores. The end of journey facilities would include showers, changing rooms, drying room and locker space as well as an accessible shower and WC. The remainder of the affordable workplace is also located within basement and accessed via a feature stair. The basement would also include a facilities management office, dual access lift, three demised WC's for the self-contained duplex office unit and would retain 24 hour UKPN maintenance access.
- 7.35 The revised M&E strategy would improve the roofscape of the building by removing some of the unsightly intake and exhaust ducts from the first-floor roof which is associated with the retail unit. The proposals would also relocate some of the retail unit plant equipment to the main roof and would conceal all new intake and exhaust ducts within a planter. Following comments during pre-application consultation, the rooftop plant enclosure has been carefully designed and set back on all sides to minimise visibility in long views. The enclosure has also been designed to be a rational architectural volume incorporating the lift overrun and staircase from the main core. The enclosure would be clad in feature PPC metal panels to reflect the proportions of the new top floor windows in the new facades onto Tottenham Court Road and Whitfield Street.
- 7.36 The proposals also include the landscaping features including the installation of planters as well as 95 sqm sedum and wildflower roofs to the roof terrace to improve biodiversity, providing suitable habitat for species diversity and encouraging pollinators, as well as

foraging and shelter for birds and invertebrates. The roof planting palette would consist of a mix of sedum, wildflower and meadow grass varieties. This includes native species diversity and those plants known to be suitable for pollinators. Plant selection for the planters would be focussed on providing evergreen structure, visual interest, diversity and texture, to avoid winter sparsity. These landscaping features lead to an Urban Greening Factor calculated at 0.05.

- 7.37 The proposals also include public realm improvements on Whitfield Street. These include the removal of street furniture and reinstating the pavement to full width and removing the circa 1 metre pavement cut ins that were previously used as dedicated police vehicle parking to allow the pavement to be widened. The expanse of cobbled paving and dropped kerb to the vehicle access into the building would be removed and replaced with paving for pedestrian use.

Mural

- 7.38 There is an existing mural located at the ground floor of the Whitfield Street elevation. The mural forms two elements which each measure 4.14m (w) x 2.83 (h). They were designed by Paul Evans and depict the Crabtree Fields Park scene.
- 7.39 The provision of this public art formed part of the November 2000 permission (ref. PS9904472) in relation to the current building. Section 3.8 of the associated Section 106 Agreement states that this must be retained and maintained in that position through the duration of the use of the development. It was the use of the building by the British Transport Police which meant that a blank frontage was a functional requirement, and it was this which provided an opportunity for the mural. Behind this mural were a charge desk, eight holding cells and an identity / parade room, which explains the almost unique requirement for a non-active frontage at this part of the Site. Clearly the police have now vacated the building and a use which for functional reasons needs a blank frontage is not going to be re-provided.

7.40 The murals currently dominate the street level frontage and reduce the level of permeability of the building and means that there is minimal glazing on this elevation, thus reducing the extent of active frontage and increasing a sense of enclosure.

7.41 Before progressing any options for the mural, a site survey has been undertaken. From this survey, it is now known that one mural is applied to a concrete wall and the other to blockwork, so that each element would be able to be moved or relocated as single panels.

7.42 Following this, the Applicant has undertaken several consultation meetings with local residents, with the main scheme queries being in relation to the mural. Following the survey, the project team has been able to commit in public consultation meetings to ensuring that the murals would be protected and certainly not destroyed. Section 8 of the Design and Access Statement, prepared by Halebrown Architects, shows whether the murals could be maintained in the current position, on this ground floor frontage or alternatively be provided within Crabtree Fields as part of the planned improvement works, along with a range of other options.

7.43 Two options have been considered as part of re-providing the mural at the same ground floor frontage:

1) Keeping the two panels in exactly the same position; and

2) Relocating the mural on the same frontage in slightly different locations. At the ground floor, entrances to the building are proposed in relation to:

- a. The main office reception;
- b. An office unit;
- c. The affordable workspace unit; and
- d. Bike / waste store.

- 7.44 It would not be possible to provide these entrances and this split of uses with the mural panels in the current locations. A further option considers relocating these in slightly different positions along the same frontage. However, this would prevent visibility and light to single aspect office accommodation which is proposed at ground floor and given internal slab openings it would also significantly reduce light to proposed office accommodation at basement level. Unlike some buildings on Whitfield Street, there is no front lightwell at this property. It would also lead to a small entrance, lacking prominence to a relatively large office building. Office accommodation which has a blank frontage and small entrance would be of a lesser value which would impact the viability appraisal and impact the land use / financial package which is proposed as part of the application.
- 7.45 An alternative option considered would relocate the panels to the rear wall of Crabtree Fields, where local residents have commented the ivy needs to be cut back. A benefit of providing the panels in the Crabtree Fields would be that they would retain their visual link with the park (locating this along Kirkman Place had been considered but discounted for this reason).
- 7.46 Local residents who have met with the Applicant team have made the point that the mural panels were not sought to be moved as part of the applications permitted last year. However, as part of the 200 sqm uplift, these previous applications sought the path of least resistance to obtain a permission which would aid the sale of the building. These proposals led to an office measuring circa 5,000 sqm having a very small entrance and a 265 sqm ground floor with virtually no active frontage.
- 7.47 For the reasons set out above, principally because the panels were provided as a functional requirement of the former police station use which is not shared by an office use, it is proposed to carefully remove the mural, safely store them, and then allow for them to be installed within Crabtree Fields as part of planned improvement works. We suggest that this is secured as part of a Mural Relocation Plan obligation within the Section 106 Agreement, should planning permission be granted.

Heritage Assessment

7.48 A full analysis of the impact of the Proposed Development on designated heritage assets is included within the Townscape Heritage and Visual Impact Assessment within Section 6 of the Design and Access Statement and has been prepared by JL Heritage. JL Heritage has been engaged from early inception of the scheme to guide and advise on heritage and townscape matters.

7.49 In terms of heritage assets, the Site is located within the Charlotte Street Conservation Area and lies directly adjacent to Sub Area 4 of the Bloomsbury Conservation Area.

7.50 There are listed buildings in the vicinity of the Site, including:

- The Rising Sun Public House, 46 Tottenham Court Road (Grade II);
- 1 Colville Place (Grade II).

There are also listed buildings in the wider vicinity of the Site, including

- 11, 11a 12 and 13 Colville Place (Grade II);
- 14, 15 and 16 Colville Place (Grade II); and
- 26 and 28 Charlotte Street (Grade II).

7.51 JL Heritage's assessment concludes that the Proposed Development would make a positive contribution to the Charlotte Street Conservation Area and on the Bloomsbury Conservation Area due to the carefully considered contextual design which would better reflect the established urban grain through improved elevational design.

7.52 In respect of the Rising Sun Public House (Grade II), JL Heritage's assessment concludes that there would be no physical impact on the structure and any potential effect on this asset's significance relates to the potential change experienced within its setting. The present architectural form and massing at the Site do not contribute to this asset's significance and the scale and nature of the proposed development is within its capacity for change. There

would be minimal perceivable impact due to its distance from the Site, the nature of the intervening townscape and the contextual nature of the proposed design.

7.53 In respect of 1 Colville Place, JL Heritage's assessment concludes that the remodelling of the Whitfield Street elevation, including the additional proposed massing (height to frontage), would bring about a minor visual change within the setting of this building. The extant permission allowed additional massing and variations to the Whitfield Street frontage of the Site and the scale of perceivable change now proposed would be negligible and of improved design. Appreciation and understanding of this asset's significance would not be affected given the Site would be behind the observer or periphery in any view of it. The established trees and mixed townscape would also limit the potential for any perceivable change within the asset's setting.

7.54 In respect of the listed buildings in the wider vicinity of the Site, JL Heritage's assessment concludes that any potential effects on their significance is limited to how the Proposed Development would affect the setting of these assets. Primarily the effects relate to the potential change in backdrop provided by the Whitfield Street frontage when experiencing the frontages of the Colville Place in views looking east. To this end, the perceivable or visible change to their setting would be minor. The design of the proposed Whitfield Street frontage has been carefully considered to be contextual in terms of scale, material and fenestration, and it is concluded that there would be no harm caused to the setting of any of these listed buildings.

7.55 Overall, the Proposed Development is considered to comply with policy and guidance in relation to design, heritage, townscape, and visual impacts. In addition to its architectural quality, the Proposed Development would better contribute to the character and appearance of the Charlotte Street Conservation Area and Bloomsbury Conservation Area and would be in compliance with the three objectives of sustainable development contained within the NPPF.

8 Energy and Sustainability

- 8.1 This section of the Statement assesses the proposed energy and sustainability strategy, and its acceptability in planning policy terms.
- 8.2 Section 14 and Paragraph 152 of the NPPF identify the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 8.3 London Plan Policies SI 1 to SI 17 seek to ensure development proposals are sustainable.
- 8.4 At a local level, through Local Plan Policy CC1, LBC require all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan.
- 8.5 In support of these objectives, LBC requires the location of development and mix of land uses to minimise the need for car travel, support energy efficiency improvements to existing buildings and the optimisation of energy efficiency.
- 8.6 Policy CC1 of the Local Plan also requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building.
- 8.7 Policy CC2 of LBC's Local Plan provides an overview of the requirements of all new developments to adopt appropriate climate change adaptation measures. The Policy also requires any development involving 5 or more residential units or 500 sqm or more of any additional floorspace to demonstrate the adaptation measures in a Sustainability Statement.

- 8.8 Additionally, Policy CC2 indicates ways in which LBC will promote and measure sustainable design and construction. This includes expecting non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM.
- 8.9 In January 2021, LBC updated the CPG on Energy Efficiency and Adaptation to help ensure that the Council’s commitment to reducing carbon emissions is achieved.

Energy and Sustainability Assessment

- 8.10 This application seeks to refurbish and extend the existing building whilst also improving its sustainability credentials. The proposals seek to achieve a BREEAM ‘excellent’ rating. The Proposed Development would implement a fabric first approach, whereby the majority of the existing structural frame and floor slabs are retained to reduce waste and cut energy consumption. Any demolition aggregate would be reused on site for new slabs where possible or recycled into new elements off site.
- 8.11 Across the Site, 97% of existing floor slabs would be retained. 30% of existing façade brickwork would be retained, the areas subject to demolition would enable improved frontages to be provided.
- 8.12 The application is supported by an Energy and Sustainability Statement, prepared by Taylor Project Services (TPS), which details the sustainable design measures which the Proposed Development incorporates, and provides a summary of the BREEAM Pre-Assessment and credits which are being targeted. Overall, a BREEAM score of 70% is currently targeted – which is equivalent to an ‘Excellent’ rating.
- 8.13 The Energy and Sustainability Statement also provides an assessment against the energy hierarchy set out in London Plan Policy SI 2.

- 8.14 In respect of 'be lean', the design of the building has sought to reduce energy demand by incorporating measures including optimally sized windows, high performing building materials, automatic lighting controls and mechanical ventilation systems with heat recovery.
- 8.15 In respect of 'be clean', the proposals include the use of highly efficient heat pump technologies, hot water supplied with electric point of use, time and temperature zone controls and use of a Mechanical Ventilation Heat Recovery (MVHR) system.
- 8.16 In respect of 'be green', the proposals would incorporate the use of solar (photovoltaic) panels to provide renewable energy and air source heat pumps to provide efficient cooling.
- 8.17 The Proposed Development, at this stage of the design process, would achieve an overall CO2 reduction of 41.51% against Part L of the Building Regulations 2021, which is above the GLA's 35% target.
- 8.18 It is concluded in terms of energy and sustainability that the Proposed Development is in accordance with London Plan Policies and Camden Local Plan, as well as the aspirations of the Energy Efficiency and Adaptation CPG. The scheme would also result in a more sustainable development than the ones previously permitted.

9 Transport and Servicing

- 9.1 This section of the Statement assesses the acceptability of the Proposed Development in planning policy terms with regard highways and servicing.

Transport and Highways Policy Context

- 9.2 Chapter 9 of the NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, to give people a real choice about how they travel and encourages solutions which support reductions in greenhouse gas emissions and reduce congestion.
- 9.3 Paragraph 111 of the NPPF is clear that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.
- 9.4 Paragraph 112 of the NPPF requires development to give priority to pedestrians and cycle movements, address the needs of people with disabilities, create places that are safe, secure and attractive and allow for the efficient delivery of goods and access by service and emergency vehicles.
- 9.5 London Plan Policy T1 states all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes. The policy further states that development should ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 9.6 Policy T5 of the London Plan requires development proposals to provide appropriate levels of cycle parking, which is fit for purpose, secure and well-located. Table 10.2 of the London Plan details minimum cycle parking standards. The minimum requirement for office, restaurant, retail and residential use is detailed below.

Table 1 – London Plan 2021 Cycle Standards

Use	Long-stay requirement	Short-stay requirement
Restaurants	1 space per 175sqm (GEA)	1 space per 20 sqm (GEA)
Offices	1 space per 75sqm (GEA)	First 5,000 sqm: 1 space per 500 sqm Thereafter: 1 space per 5,000 sqm (GEA)
Retail	First 1000 sqm: 1 space per 250 sqm Thereafter: 1 space per 1000 sqm (GEA)	First 1000 sqm: 1 space per 60 sqm Thereafter: 1 space per 500 sqm (GEA)
Residential	1 space per studio or 1 person 1 bedroom dwelling 1.5 spaces per 2 person 1 bedroom dwelling 2 spaces per all other dwellings	5 to 40 dwellings – 2 spaces

- 9.7 Policy T6 of the London Plan details the Mayor’s approach to the provision of car parking. Part B states that car-free development should be the starting point for all development proposals in places that are (or planned to be) well-connected by public transport.
- 9.8 Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this LB Camden will seek to ensure developments improve the pedestrian environments by supporting improvements to the pedestrian environment. The delivery of improved walkways, wide pavements and safe and permeable developments is supported.
- 9.9 Policy T1 (h) states that LB Camden will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the

London Plan (Table 6.3) and design requirements outlined within LB Camden’s Transport CPG (2021).

- 9.10 LB Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free.
- 9.11 In January 2021, LB Camden adopted its Transport CPG which provides information on all types of detailed transport issues within the borough.
- 9.12 Part G of London Plan Policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.
- 9.13 Local Plan Policy T4 states that the council will promote the sustainable movement of goods and materials and requires developments of over 2,500sqm to minimise the impact of freight movement via road by prioritising the use of the TfL road network or other major roads, accommodation goods vehicles on-site and providing Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate.
- 9.14 Local Plan Policy CC5 outlines that the Council requires developments to include facilities for the storage and collection of waste and materials.

Transport and Servicing Assessment

- 9.15 The Site has excellent public transport links, with a Public Transport Accessibility Level of 6b, the highest score that can be achieved. Information regarding transport and servicing arrangements can be found within Section 5 of the Design and Access Statement.
- 9.16 In accordance with London Plan Policy T6 and the Camden Local Plan, the Proposed Development would be car free as all car parking spaces which are currently at the Site would be removed. Due to the car-free nature of the Proposed Development, visitors are therefore

likely to travel sustainably using the wide range of public transport services available near to the Site as well as walking or cycling, in accordance with the London Plan, Mayor's Transport Strategy (2018) and the Mayor's Healthy Streets Agenda.

- 9.17 In accordance with London Plan Policy T6, the Proposed Development would provide 70 long stay cycle parking spaces.
- 9.18 Whilst the 70 long stay cycle parking spaces do not meet Camden's preference for an additional 20% increase in long stay cycle parking spaces above the London Plan requirement, it is considered that the Proposed Development has maximised the amount of cycle parking spaces that can be provided, working within the limitations of the refurbishment of the existing building. Similarly, it has not been possible to locate the 10 short stay cycle parking spaces within the Site. However, the provision of 70 long stay cycle parking spaces is a considerable increase in the amount of cycle parking spaces on site, as there are only 8 existing long stay cycle parking spaces. The number of bike spaces is also significantly above the policy requirement when just accounting for the 890 sqm GEA uplift in floorspace.
- 9.19 The long stay cycle parking spaces would be located at ground floor level in the space that is currently occupied by the car park ramp and would be accessed via Whitfield Street via an automated door.
- 9.20 In line with Camden's Transport CPG (2021), four large cycle parking spaces are to be provided to accommodate non-standard cycles.
- 9.21 The end of journey facilities would be located at basement level and would include showers, changing rooms, drying room and locker space as well as an accessible shower and WC, which can double up as visitor WC accessed via the lift from reception. These facilities would encourage office users to cycle to work, thus meeting the aims of London Plan and Local Plan transport policies.

9.22 In terms of refuse, as required by Local Plan Policy CC5, the Proposed Development includes a new dedicated refuse store at ground floor, accessible from Whitfield Street.

10 Amenity

- 10.1 This section of the Statement assesses the Proposed Development against amenity considerations comprising daylight and sunlight and noise as there are residential buildings close to the Site.

Daylight and Sunlight Policy Context

- 10.2 At the national level, the Building Research Establishment ('BRE') Report 'Site Layout Planning for Daylight and Sunlight 2022' comprises tests to assess the impact that a new development will have on the light to neighbouring properties. The tests within the document are given as advice and are not mandatory. As such they are not planning policy.
- 10.3 The examples given with the BRE guide can generally be applied to any part of the UK, from urban to rural locations. The BRE Guidelines specify that the daylight and sunlight results be considered flexibly and in the context of the Site. Clearly there would be a higher expectation for daylight and sunlight in a rural or suburban environment than in a dense city centre location such as this in Camden. Therefore, the guide needs to be applied sensibly when assessing daylight and sunlight to allow for a more practical approach to central London urban design.
- 10.4 The BRE Report advises that daylight and sunlight levels should be assessed for the main habitable rooms of neighbouring residential properties. Habitable rooms in residential properties are defined as kitchens, living rooms and dining rooms.
- 10.5 Vertical Sky Component ('VSC') analyses the daylight provided at the centre of a window and is the most commonly used daylight testing method. The BRE guidance considers that if a development would lead to a neighbouring window having less than 80% of its former value then the occupants of the existing building will notice the difference.

- 10.6 The daylight distribution method assesses the change in position of the No Sky Line ('NSL') between the existing and proposed situations.
- 10.7 The Annual Probable Sunlight Hours ('APSH') method is used to test the impact that a development would have on sunlight levels at existing southern facing residential windows. The BRE guidance recommends that the APSH received at a given window should be at least 25% of the total available, including 5% in winter.
- 10.8 London Plan Policy D6 states the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing, and maximising the usability of outside amenity space.
- 10.9 Policy A1 of Camden's Local Plan sets out how the Council will manage the impact of development to protect the quality of life of occupiers and neighbours. The policy states that planning permission will be granted unless it causes unacceptable harm to residential amenity. To protect residential amenity, the Council will consider a variety of factors including sunlight, daylight and overshadowing.


Daylight and Sunlight Assessment

- 10.10 A Daylight and Sunlight Report has been prepared by GIA and has been submitted as part of this planning application. The daylight and sunlight analysis has been considered by reference to the criteria and methodology within the Building Research Establishment Guidelines (2022), which when published, recognised that it should not form a mandatory set of criteria, rather it should be used to help and inform design.
- 10.11 Overall, the proposed development would achieve a good level of daylight compliance, given the central urban London location. Of the 136 windows assessed for VSC, 107 (78.7%) would meet the BRE Guidelines. Of the 73 rooms assessed for NSL, 54 (74%) would meet the BRE Guidance.

- 10.12 With regards to sunlight (APSH), the scheme would achieve a good level of BRE compliance given the central urban London location. Of the 33 rooms assessed, 24 (72.7%) would meet the BRE Guidance.
- 10.13 Where transgressions from guidance occur for daylight and sunlight these are primarily located to those properties which sit in very close proximity to the development Site and have external balconies. In the majority of instances, the windows and rooms which face the Site are understood to likely serve secondary rooms such as bedrooms which have a lower expectation for daylight (NSL) and sunlight (APSH). The main habitable spaces of these properties, for example 53-54 Tottenham Court Road, such as living rooms, likely face away from the development Site and would not be impacted by the scheme.
- 10.14 Where there are properties which do have main living spaces facing the site, such as 11-13 Godge Street, detailed design amendments have been undertaken to lessen the impact. In doing these additional studies with the architect, the majority of the living spaces in this property would experience minor losses in VSC when considering the without balcony assessments.
- 10.15 The Proposed Development is therefore considered to be in compliance with London Plan Policy D6 and Camden Local Plan Policy A1 by virtue of not causing unacceptable harm to residential amenity.

Noise Policy Context

- 10.16 Paragraph 174 of the NPPF requires planning decisions to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of, among other things, noise.
- 10.17 London Plan Policy D14 details the ways in which development proposals should manage noise. The list includes avoiding significant adverse noise impacts, mitigating and minimising the existing and potential adverse impacts of noise without placing unreasonable restrictions on existing noise-generating uses, improving and enhancing the acoustic environment and



separating new noise-sensitive development from major noise sources using distance, screening, layout, orientation, uses and materials.

10.18 At a local level, Camden Local Plan Policy A1 seeks to manage the impact of adverse effects from noise and vibration.

10.19 Policy A4 of the Local Plan sets out that noise and vibration in developments will be managed, and planning permission will only be granted for noise generating equipment (including plant and machinery) if it can be operated without causing harm to amenity. Detailed standards are set out in Appendix 3 of the Local Plan.


Noise Assessment

10.20 The application is supported by a Noise Impact Assessment, prepared by Venta Acoustics. An existing background noise survey has been carried out to assess the existing noise environment experienced by the closest existing residential receptors. Regarding noise from plant equipment, an assessment has been undertaken to establish the maximum external noise levels from the proposed building services plant. The assessment outlines design criterion for plant noise emission limits, based on Camden's planning requirements and the information gathered from the survey. The assessment also establishes the predicted noise generated from people using the external terraces.

10.21 The Noise Impact Assessment has assessed the proposed plant equipment and concludes that, subject to the recommended mitigation measures, the plant equipment would comply with Camden's noise criteria guidance and would not have a significant adverse noise impact.

10.22 The Noise Impact Assessment also concludes that the anticipated noise generated from people using the roof terrace would also be anticipated to have no adverse impact on amenity.

10.23 To ensure that this is the case, the proposed terraces would have limited hours of use and would only be able to be used by office tenants. The terraces on the Whitfield Street



elevation at first, second, third and fourth floors would be able to be accessed from 9am to 8pm, Mondays to Fridays. The terrace on the north elevation at first floor would be accessed from 9am to 7pm, Mondays to Fridays. The terrace on the Kirland Place elevation at third and fourth floor levels would be accessed from 9am to 8pm Mondays to Fridays. No music would be able to be played on the terraces.

10.24 In noise terms, it is concluded that the Proposed Development would protect neighbouring amenity and is therefore in compliance with Policies D13 and D14 of the London Plan and Policies A1 and A4 of the Camden Local Plan.

11 S106, CIL and Planning Conditions

- 11.1 Under Section 106 of the Town and Country Planning Act 1990 (as amended), local planning authorities have the power to enter into planning obligations with the Applicant and any persons with an interest in the land to be developed as a means of mitigating any impacts of a development proposal.
- 11.2 In accordance with Regulation 122(2) of the CIL Regulations (as amended), and paragraph 57 of the NPPF, planning obligations should only be sought where they meet all the following tests:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 11.3 Paragraph 55 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 11.4 In terms of the Proposed Development, the potential Section 106 heads of terms are listed below to form the basis for discussions with Officers during the determination period. These have been considered within the accompanying Financial Viability Assessment to inform the maximum package which can be provided.

Employment and Training

- 255 sqm GIA of affordable workspace at a 50% discount for a 10-year period;
- Affordable Workspace Specification and Management Plan;
- Employment and Training Plan.

Transport

- Cycle stand contribution;
- Highways Contribution;

- Travel Plan and Travel Plan Monitoring Contribution;
- Construction Management Plan.

Mixed use payment in lieu

- Payment in lieu of residential delivery of £325,750.

Design

- Mural relocation plan;
- Levels plan.

Community Infrastructure Levy (CIL)

11.5 On 6 April 2010, the Community Infrastructure Levy Regulations 2010 came into force to fund the provision, improvement, replacement or maintenance of infrastructure required to support development, as set out within each Local Authority's Regulation 123 list (a 'living' document which provides a summary of the infrastructure which CIL receipts should fund).


11.6 In London, CIL is charged at both a regional level, by the Mayor, as well as at a local level, by London Borough of Camden. In terms of Mayoral CIL, the revised Charging Schedule referred to as MCIL2 is now used and given that this Site is within the Band 1 and Central London charging zones, it is payable at the following rates:

- Offices - £185 per sqm GIA (plus indexation)

11.7 Camden adopted its revised CIL charging schedule on 30 October 2020. This Site is within Zone A (Central), where development is charged at the following rates:

- Office – £110 per sqm GIA (plus indexation).

11.8 A CIL form has been completed and submitted with this application.



Planning Conditions

- 11.9 Paragraph 56 of the NPPF states that planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. It goes on to set out the pre-commencement conditions should be avoided unless there is clear justification. We will look to agree potential planning conditions with Officers during the determination period. This will include conditions in relation to the date by which development should commence before expiring and the number of long-stay bicycle racks to be provided.



Appendix A

PLANNING HISTORY

55 Tottenham Court Road and 16-24 Whitfield Street

Reference No.	Address	Type of Application	Validation Date	Description of Development	Status	Notes
CS9905196	55 Tottenham Court Road W1	Conservation area consent	26-11-1999	Demolition of the buildings on the site, as shown by drawing numbers 9445/1-4.	Approved 20-11-2000	Condition 1: The demolition hereby permitted shall not be undertaken before a contract for the carrying out of the works of redevelopment of the site has been made and full planning permission has been granted for the redevelopment for which the contract provides.
PS9904472	55 Tottenham Court Road and 16-24 Whitfield Street London W1	Full	17-07-2000	Redevelopment of the site to form a mixed use development with a British Transport Police Station and headquarters Building on basement, ground and first to third floors (both sui generis use), with pedestrian and vehicular entrances on Whitfield Street, together with Class A1 retail use on the basement, ground and first floors of the Tottenham Court Road frontage, with plant on the first and fourth floors, as shown by drawing numbers (a) 9445/1-4 and L277/P(0)/100A, 101, 102B, 103A, 104A, 105A, 106A, 108A, 109A, 110A, 111A, 112 and all documents and letters listed in the Schedule of documentation dated 24 February 2000.	Approved 20-11-2000	
PSX0005383	55 Tottenham Court Road W1	Approval of details	05-12-2000	Approval of details of the design of the building foundations as they affect the tree on the highway, pursuant to condition 14 of the planning permission ref PS9904472R3 dated 20 November 2000, as shown on drawing number: 9104/04 and Tree Protection Method Statement.	Approved 06-02-2001	

PSX0105028	55 Tottenham Court Road W1	Approval of details	23-08-2001	Submission of details of facing materials: metal seemed roof cladding, artificial slate, render, reconstituted stone, window frames and louvers, and metal panels to lower parts of windows, - pursuant to additional condition 3 of planning permission (Reg. No. PS9904472R3) dated 20th November 2000, as shown on drawing numbers: C(3)001, L277-L(0)07E, 15B, 16C, 17B, 18B, L277/P(0)122, 123, 130.A, 131.A, 132.A, 133.B, 134, 135, 136, 137, 138, 139, 141, 142, submitted samples of metal roof cladding by Butler, reference "Butler MR24 Merlin Grey" superceded in terms of colour by "Butler MR24 00 A 05"; artificial slate by Eternit, product "Eternit 2000", "Rivendale", colour blue/black; render by Snowcem, product: "cemrend", colour "millenium ivory"; reconstituted stone by Britannia Stone, reference 12 RF/AW or 21 RF/AW, metal window frames and louvers by HB Fuller Company with polyester powder coated finish reference RAL 7015, and metal panels to lower parts of windows by HB Fuller Company with polyester powder coated finish reference RAL 7004.	Approved 01-10-2001	
PSX0104621	55 Tottenham Court Road W1	Approval of details	23-08-2001	The approval of the brick, material ref 6, lbstock Leicester Breckland Autumn Stock, colour reference 0186, with Mortar-Tilcon, colour reference Y172 in part fulfilment of the requirements pursuant to condition 3 of planning permission ref PS9904472R3 dated 20th November 2000.	Approved 28-08-2001	
PSX0204446	55 Tottenham Court Road W1	Full	15-04-2002	Amendment of condition 1 (retail opening hours) of planning permission dated 20 November 2000 (reference PS9904472R3) for the redevelopment of the site for a mixed-use development including a retail store on basement, ground and first floors, on the Tottenham Court Road frontage.	Approved 10-06-2002	

PSX0204524	55 Tottenham Court Road W1P 9DP	Approval of details	07-05-2002	Approval of details of the method of waste storage and waste removal from the Marks and Spencers Simply Food Store pursuant to condition 9 of the planning permission for the development of a retail store and a British Transport Police Station and headquarters building (reference PS9904472R3 dated 20.11.2000), as shown on drawing number; 3190/22; and Marks and Spencer PLC 55 Tottenham Court Road Storage and Waste Removal statement (undated).	Approved 29-08-2002	
PSX0204670	55 Tottenham Court Road W1	Approval of details	27-05-2002	Approval of details of 4 basement parking bays for people with disabilities pursuant to condition 11 of planning permission dated 20 November 2000 (reference PS9904472R2) for the development of a British Transport Police Station and headquarters building, as shown on drawing number; L277-L(0) 03G; and letter dated 23.7.2002.	Approved 29-08-2002	Check DN
PSX0204795	55 Tottenham Court Road and 16-24 Whitfield Street London W1	Approval of details	24-06-2002	Approval of details of acoustic report pursuant to condition 2 of planning permission dated 10.9.2001 (reference PSX0104266) for amendment to the roof plant at fourth floor level, approved in the planning permission for the development of a British Transport Police Station and headquarters building (reference PS9904472R3 dated 20.11.2000), as shown by; Report titled "55 Tottenham Court Road, W1, Noise Control for Roof Plant Room", dated 12 June 2002.	Approved 29-08-2002	
PSX0204980	Marks and Spencer Food Store 55 Tottenham Court Road W1	Full	12-08-2002	Variation of condition no. 2 of planning permission PS9904472/R3 to allow extended servicing and delivery hours to the retail store, as shown by drawing numbers: CL/5680/4, Noise surveys summary report ref. A5830/R02-DT-A (JGC/LK) dated 9/8/2002, Transport statement - delivery arrangements by 'Savell Bird & Axon' dated August 2002 and letter by NL &P dated 27 January 2003 ref. CL/5680/MN.	Approved 07-04-2003	

PSX0104231	55 Tottenham Court Road and 16-24 Whitfield Street London W1	Approval of details	23-02-2001	Submission of details of design and method statement for all foundations which takes account of the proposed running tunnels of the Chelsea Hackney Line pursuant to additional condition No. 12 of planning permission (PS9904472/R3), dated 20th November 2000. As shown on drawing number 9104/11 Rev A4, SHP1 (Calcs dated 19/01/01), correspondence (dated 08/02/01 and 19/02/01) and method statements 55TCR/MS/3.	Approved 17-04-2001	
PSX0204007	55 Tottenham Court Road and 16-24 Whitfield Street London W1	Approval of details	17-01-2002	Partial discharge of additional condition 03 of planning permission PS9904472/R3 dated 6th April 2000 relating specifically to detailed design of elevations and facing materials of shopfront on Tottenham Court Road and Kirkman Place, as shown on drawing numbers; 3190/06, 3190/07, 3190/11, 3190/14B, & CL/5680/2.	Approved 26-02-2002	
PSX0204160	55 Tottenham Court Road and 16-24 Whitfield Street London W1	Approval of details	15-02-2002	Submission of details pursuant to part of additional condition 03 of planning permission PS9904472/R3 dated 6th April 2000 relating specifically to details of CCTV cameras on Tottenham Court Road and Kirkman Place, as shown on drawing numbers; 3190/11 Rev.A; 14 Rev.A; and specifications and details of the proposed CCTV.	Approved 18-06-2002	
PSX0204719	55 Tottenham Court Road and 16-24 Whitfield Street London W1	Approval of details	04-07-2002	Approval of details of the design and fitting of vehicle doors on Whitfield Street and the design and position of CCTV cameras pursuant to condition 3 of the planning permission for the development of a British Transport Police Station and headquarters building (reference PS9904472R3 dated 20.11.2000), as shown on drawing numbers; L-277/P(0)150revA; Vista Protos VCMH/VSCMH Housing Range for CCTV cameras; Technical specification Stokvis Rolashutter details and further details CI/SfB(31.55) Xh2; Technical specification for Steril Stokvis Thermadoor Model 640 and further details CI/ SfB(31.55)Xh2/h4; Bickerdike Allen Partners Sectional Overhead Doors Acoustic Appraisal dated 24 April 2002; and materials sample M4L0053 RAL7015.	Approved 29-08-2002	

PSX0205094	55 Tottenham Court Road and 16-24 Whitfield Street London W1P 9RD	Approval of details	07-10-2002	Submission of details of first floor roof plant pursuant to condition no. 7 of planning permission (Reg. PS9904472/R3) granted on 20 November 2000, as shown on drawing numbers: L277-SK(0)28A, L(0)014A, L277- L(0)09G and Acoustic report A5533/RO3-JM (30/9/2002).	Approved 23-01-2003	
PSX0105262	55 Tottenham Court Road W1	Approval of details	22-10-2001	Submission of details of mortar, pursuant to additional condition 1 of planning permission (Reg.No. PSX0104621R3) dated 28.08.01 (sample panel on site), as shown on; Sample panel erected on site.	Approved 04-12-2001	
PSX0105307	55 Tottenham Court Road W1	Approval of details	07-12-2001	Submission of details of retail goods entrance doors on Kirkman Place pursuant to additional condition 3 of planning permission (Reg.No. PS9904472/R3) dated 20 November 2000, as shown on drawing numbers: L277/P(O)133.C, manufacturer's details of "Taskmaster S Series" steel doors.	Approved 01-02-2002	
PSX0104266	55-58 Tottenham Court Road W1	Full	06-03-2001	Amendment to planning permission dated 20th. November 2000 (reg. no. PS9904472/R3) by the extension to the fourth floor plant room, and the reduction in size of four natural ventilation louvers installed in a ground floor flank wall of the north west elevation, as shown on drawing numbers: 9856 MSK 113/ revision 108; L277/P(0)120; 121; 122; 123; 124; 125; 126 and acoustic report letter dated 9th. August 2001.	Approved 10-09-2001	
PSX0204300	55 Tottenham Court Road W1	Approval of details	08-03-2002	Part submission of details pursuant to condition 07 (which covers all noise generating plant and equipment) relating to the plant at first floor level (on the Tottenham Court Road frontage) and the lift at ground floor level, in connection with the planning permission ref PS9904472R3 dated 20 November 2000 for the redevelopment of the site for a mixed use building for the British Transport Police and a Class A1 retail store on basement, ground and first floors on the Tottenham court Road frontage, as shown on drawing numbers: CL/5680/2, 3190-21, M05C, 016297/04B, 2699VE01-01A and VE01-03.	Approved 22-04-2002	

PSX0204193	55 Tottenham Court Road W1P 9RD	Full	13-03-2002	Variation of additional condition 04 of planning permission (Ref. No. PS9904472/R3) dated 6th April 2000, requiring the provision of an un-obscured shop front window and shop front display onto Kirkman Place, as shown on drawing numbers; 3190/11 RevA, 3190/14 RevC, and CL/5680/3.	Approved 19-03-2002	
2022/0568/P	Central London Police Station 16 - 24 Whitfield Street London W1T 2RA	Full	16-03-2022	Change of use of existing British Transport Police station and offices (Sui Generis) to Offices within Use Class E(g)(i) including removal of basement car parking, ramp and vehicle dock.	Approved 07-11-2022	
2022/2626/P	Central London Police Station 16 - 24 Whitfield Street London W1T 2RA	Full	21-06-2022	Extensions at second floor and fourth floor levels to provide commercial (Class E) floorspace, new external plant area and external amenity areas at third and fourth. Alterations to Tottenham Court Road elevation involve installation of double-glazed aluminium windows and grey aluminium panels at first floor following the removal of ventilation grills. Removal of existing plant room at fourth floor level and associated alterations.	Approved 27-10-2022	