



EUSTON TOWER

Town Planning Statement

December 2023



Town Planning Statement

Euston Tower, 286 Euston Road, London, NW1 3DP

On behalf of:

British Land Property Management Limited

December 2023



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1 Executive Summary

- 1.1 This Planning Statement provides a comprehensive review of relevant national, regional and local planning policies in relation to the Euston Tower proposals (the 'Proposed Development'). It sets out the planning justification for the Proposed Development and contains a detailed assessment in relation to relevant development plan policies and other material planning considerations.
- 1.2 Euston Tower is situated in the heart of central London, on a prominent site on Euston Road at the junction with Hampstead Road. It is located within the Knowledge Quarter Innovation District ('KQID' / 'KQ') which spans from Camden Town to Holborn and Covent Garden and is home to a world-class cluster of scientific and knowledge based institutions and companies that specialise in areas like life sciences, data and technology and the creative industries. The existing tower was built in the 1960's and whilst the lower floors are occupied by retail and café uses, the upper floors have been vacant for several years, with the last floors vacated in 2021.
- 1.3 British Land is the freehold owner of the site and the surrounding Regent's Place (through various group companies) and is seeking to bring forward exciting proposals to reimagine the disused tower and its surrounding public realm.
- 1.4 British Land's vision is to create a world leading science, technology and innovation building and public realm for Camden and the KQ that inspires, connects, and creates opportunities for local people and businesses and in doing so:
- Transforming the existing Euston Tower ensuring it is fit for the future by adopting cutting-edge sustainability targets and reusing, recycling, and offsetting, where necessary, to reach net zero at completion and in operation.
 - Putting social impact at the heart of the project from the start and ensuring that communities play a key role in shaping new spaces which meet local needs.
 - Creating pioneering workspaces in the KQ for businesses of all sizes to prosper, including flexible incubator and accelerator spaces, to support start-ups, scale-ups, and knowledge sharing.

- Ensuring that the future use of Euston Tower is built upon identified need and contributes to a thriving local, regional and national economy for our ever-changing world.
- Reimagining the public spaces, creating safe, inclusive, connected and sustainable spaces for Camden's communities, though delivering an enhanced public realm connected with the tower redevelopment.
- Contributing towards meeting Camden's housing needs.

1.5 The Proposed Development for which planning permission is sought is:

“Redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey building for use as offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces. Provision of public realm enhancements, including new landscaping, and provision of new publicly accessible steps and ramp. Provision of short and long stay cycle storage, servicing, refuse storage, plant and other ancillary and associated works.”

1.6 The Proposed Development has been informed by a robust feasibility study, which, amongst considering other elements necessary for a successful redevelopment which optimises this landmark building in the KQ, looks at the whole life carbon footprint associated with different extents of deconstruction to deliver a reimagined Euston Tower. The detailed feasibility study of the proposals has been assessed by the London Borough of Camden's ('LBC') third party advisors as part of the pre-application discussions on the project. A philosophy which has underpinned the evolution and formulation of the scheme proposals has been to adopt pioneering circular economy principles and exemplar sustainability credentials, to achieve the optimum lowest whole-life carbon emissions position.

1.7 The reimagined tower has been designed by 3XN Architects, whose own philosophy is to constantly seek to enhance a sense of community, identity, and relationship to others through beautiful and functional spaces. The proposed tower has been designed to an exemplary standard and is supported by a comprehensive townscape analysis to ensure that



it relates to and provides a positive contribution to its surroundings and respects the nearby heritage assets.

- 1.8 The submission of this planning application follows extensive consultation with the local community and other interest groups, close consultation with planning, design, conservation, inclusive economy, sustainability and transport officers at LBC, as well consultation with other key stakeholders, including the Greater London Authority, Transport for London and Historic England.
- 1.9 The vision for the Proposed Development directly responds to the aspirations at all levels for a successful and inclusive KQ. “KQ 2050” prepared jointly this year by Camden and Islington Councils in conjunction with the KQ Partnership states that, “By 2050, we want the Knowledge Quarter to be and be known as the best place in Europe for collaboration, innovation, and research; a place that delivers inclusive opportunities for local residents, regardless of their means, to fulfil their social and economic potential within the KQ area.”
- 1.10 It goes on to say that “we encourage investments that safeguard and amplify the existing life-science expertise in London. To achieve this, immediate delivery of much-needed wet labs, innovation and incubation space, and related offices and amenities, is essential. Such investments will solidify London’s global standing as envisioned in the London Economic Recovery Framework building on the KQ as world-leading innovation campus that serves as a beacon and contributes to the regeneration and transformation of the Central Activities Zone (‘CAZ’). In return, this will create a broader range of opportunities for local communities.”
- 1.11 The Government’s Science and Innovation Audit Report (2018), sponsored by the Department for Business, Energy and Industrial Strategy, highlighted the KQ’s role as arguably the densest concentration of scientific and knowledge-based organisations anywhere in the world, creating an ‘incubator for the UK.’ A key conclusion of that Audit was the identification of:
- Low availability and high cost of appropriate commercial sites and premises.
 - A dearth of innovation space, especially wet-laboratory space for Life Science start-ups and small businesses.

- A lack of suitable move on space for companies wishing to expand operations/take on more staff.
- A lack of business accelerators for start-ups and other small firms.

1.12 The recently launched Knowledge Clusters report (November 2023) commissioned by the London Property Alliance, looks at the development of London's knowledge clusters, including the KQ, over the last 5 years. It concludes that the fundamentals behind London as a life science supercluster are strong but there is still a shortage of space, in that 85% of London's life science sector is made up of start-ups and SMEs, and London does not have the volume of space to accommodate these types of occupiers.

1.13 British Land and Savills have also published a report 'Accelerating Innovation, a five-point plan to boost life sciences real estate' November 2023 which highlights that the supply of life sciences real estate is failing to keep up with demand, particularly for early stage business with high growth potential. The report advises that the UK's life sciences sector ultimately needs more room to innovate and grow.

1.14 British Land is looking to reposition Regent's Place as a life science and innovation hub in the Knowledge Quarter and to consolidate and expand the concentration of KQ uses to the west, immediately opposite the world-renowned UCL and research and teaching hospital, UCLH.

1.15 This Proposed Development seeks to bolster London and the KQ's strength as a growing life science location and address the significant shortage of life-science enabled real estate by delivering a building which can cater to occupiers that would support and contribute to the growth and success of the KQ as a world-class cluster of science and knowledge-based institutions. The proposal would provide 19,939 (GIA) sqm of flexible office and lab-enabled floorspace, 2,670 (GIA) of Accelerator Space, in addition to 42,886 (GIA) sqm of office floorspace, to cater for a range of different size occupiers from start-ups and spin outs, growing businesses and large employers. (Note these areas are by floor and set out within Table 2 at paragraph 5.10 of this Statement).

1.16 The Proposed Development would meet LBC's ambitions for a successful KQID which seeks to directly improve the lives of local communities in which the development sits environmentally, socially and economically. From the outset, social impact has been positioned at the heart of the project; an extensive consultation and co-design process has

ensured that the local community have played a key role in shaping the new internal and external spaces, so that they meet local needs and opportunities.

- 1.17 Co-design workshops were held over 3 events ahead of a two-stage public exhibition in July and October 2023, with over 570 individuals attending all events. The project design team interacted and connected with local residents and local groups and the outcomes of the workshops and events have influenced the proposals for which planning permission is sought.
- 1.18 The lower three floors of the proposed building have been designed to be fully accessible in the form of a Neighbourhood Innovation Lab ('NIL'). The NIL is a format conceived to respond to the specific context of Euston Tower, including community needs and interests, the local ecosystem of existing organisations and initiatives and the distinctive local spirit of the area. Comprised of a substantial space on the ground, first and second floor of the Euston Tower, the NIL would activate the public space and deliver a creative, social and ultimately flexible space for the local community – including local residents, community groups, knowledge organisations and business, to work together on shared challenges encouraging community participation in science, technology and innovation. A central ambition is for Euston Tower to provide opportunities for people at different stages of their lives. The NIL is the vehicle within the Proposed Development to connect people to opportunity, whether that's through play and inspiration or learning and skills.
- 1.19 The third floor of the building is also proposed to be fitted out as 'accelerator' lab enabled space to provide a space for start-up and scale-up businesses looking to grow into the life science sector.
- 1.20 The proposed public realm and landscaping around the site would provide a number of spaces for the community to gather and have been designed to flow seamlessly with the lower levels of the building. The new green, safe and inclusive public spaces have been designed by DSDHA who led on the spatial strategy for the West End Project along Tottenham Court Road, the Central Somers Town project, Princes Circus and Museum Street and would extend the network of these green spaces and squares throughout Bloomsbury.
- 1.21 The proposed public uses and significantly enhanced public realm would provide a range of safe, inclusive, and usable internal and external spaces for the local community to enjoy.

1.22 In March 2022, Camden Council published “We Make Camden” – a refreshed vision for the future of Camden. It sets out what the Council wants to collectively achieve and lead together and was developed following conversations with residents, partners, and community leaders. The ‘We Make Camden’ ambitions are:

- Every child has the best start in life;
- Camden’s local economy should be strong, sustainable, and inclusive – everyone should have a secure livelihood to support them to live a prosperous life;
- Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute;
- Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well, and age well;
- Everyone in Camden should have a place they call home; and
- Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency.

1.23 The Proposed Development has been designed to respond to Camden’s ambitions for its borough as set out in the ‘We Make Camden’ document, as well as the KQ2050, Euston Social Value Charter and British Land’s social impact strategy at Regent’s Place. In summary, the Proposed Development would deliver a substantial package of public benefits including:

Environmental

- Retention of 31% of the structure of the existing building, following a three part feasibility study which has been independently reviewed by Camden’s advisers;
- Targeting BREEAM “Outstanding” for office areas and BREEAM “Excellent” for retail areas;
- Net zero carbon in construction and operation;
- Incorporating pioneering circular economy principles, including opportunities for reuse, upcycling and recycling;



- Creating an adaptable and flexible building to meet the needs of modern and future occupiers;
- An all-electric heating and cooling energy strategy;
- An ambitious approach to greening and biodiversity, with a target of over 26% Biodiversity Net Gain and over 0.3 Urban Greening Factor score achieved through a comprehensive public realm and landscape strategy;
- Incorporating wind mitigation measures throughout the Proposed Development including grilles in the podium, setbacks at ground floor level, totems and landscaped features throughout the public realm to disperse wind and provide an improvement on the current microclimate conditions;
- Provision of leading cycle and runner commuter facilities to encourage sustainable, active travel options to contribute to both the health and wellbeing of the wider area and users of the building.

Social

- Reimagining the public spaces around Euston Tower, creating safe, inclusive, green connected and sustainable spaces for Camden's communities to visit, rest, learn and play;
- The inclusion of three floors of publicly accessible space, anchored in the innovative concept of a Neighbourhood Innovation Lab. The spaces within the podium have been designed to be flexible, to enable the existing social value infrastructure, programmes and activities to grow and engage the local community at all stages of their lives;
- Designing the uses within the base of the tower to flow seamlessly with the new green and inclusive public realm around the development bringing communities together, to provide a safe space to meet and collaborate with others;
- Housing to be delivered through a Payment in Lieu, to be directed towards the delivery of affordable housing by the Council on a Council owned site, to be secured via Section 106 legal agreement.



Economic

- Approximately 1,055 FTE new jobs created during the construction period;
- Construction jobs first targeted at LBC residents via the Kings Cross Construction Skills Centre and others working alongside the LBC Inclusive Economy team;
- The workers at the proposed development would uplift the economic output (GVA) of the site by £386m-£462m per year;
- Provision of work placements and apprenticeships during the construction period and development of an Employment and Skills Plan (construction and end use) with targets for apprentices and work placements post-completion;
- The Proposed Development would anchor the western end of the Knowledge Quarter, through providing high quality work and life science space, with 3,605-4,375 jobs supported at the Proposed Development (equivalent to 8-10% of LBC's projected employment growth over the next decade) once operational;
- A proposed Neighbourhood Innovation Lab, fully accessible to the public, providing spaces for exhibitions, spaces to meet and collaborate, encouraging the local community into the science, technology and innovation sector;
- A fully fitted out 'accelerator' lab-enabled space to provide an affordable workspace for small and start-up and scale up businesses looking to grow into the life science sector. Through removing lab fit-out costs and upfront capital expenditure for growing business, it allows available resources to be focused on research and development; and
- Requirement to ensure all employees, contractors' employees and sub-contractors' employees on site in connection with deconstruction and construction are paid at a rate not less than the London Living Wage.

2 Introduction

- 2.1 This Planning Statement has been prepared by Gerald Eve LLP on behalf of our Client, British Land Property Management Limited, hereafter 'British Land' ('the Applicant'), to support an application for planning permission in respect of its proposals at Euston Tower ('the Site').
- 2.2 The planning application has been brought forward following extensive consultation with the local community and interest groups and close pre application discussions with planning, design, conservation, inclusive economy, sustainability and transport officers at the London Borough of Camden ('LBC') as well as key stakeholders including the Greater London Authority ('GLA'), Transport for London ('TfL') and Historic England ('HE').
- 2.3 The application is a strategic application referable to the Mayor of London in accordance with Category 1B(b) and 1C(c) of the Schedule Town and Country Planning (Mayor of London) Order 2008.
- 2.4 This statement sets out the town planning case in support of the application. It provides an overview of the site and surroundings, the planning history and assesses the Proposed Development in the context of national, regional and local planning policy and guidance.
- 2.5 This Statement identifies national, strategic, and local planning policy and guidance relevant to the application and assesses the degree to which the application accords with the statutory development plan. This Statement also identifies other material considerations relevant in determining the applications, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 2.6 This application seeks full planning permission for the following ('the Proposed Development'):

Full Planning Permission:

"Redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey building for use as offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external

terraces. Provision of public realm enhancements, including new landscaping, and provision of new publicly accessible steps and ramp. Provision of short and long stay cycle storage, servicing, refuse storage, plant, and other ancillary and associated works.”

2.7 The Proposed Development does not fall within the threshold set out in paragraph 10b of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) ('EIA') Regulations 2017, as it does not involve an urban development of more than 1ha and is not a dwellinghouse development. However, it was identified that whilst being below this assessment threshold the Proposed Development may give rise to significant environmental effects, and as such, it has been subject to the EIA process. The planning application is accompanied by an Environmental Statement, prepared by Trium.

2.8 This Planning Statement is structured as follows:

- Chapter 1: Executive Summary
- Chapter 2: Introduction
- Chapter 3: Site and Surrounding Area
- Chapter 4: Planning History
- Chapter 5: Development Proposals
- Chapter 6: Pre-Application Engagement and Consultation
- Chapter 7: Planning Policy Framework and Legislation
- Chapter 8: Principle of Development
- Chapter 9: Principle of Deconstruction
- Chapter 10: Land Use
- Chapter 11: Design
- Chapter 12: Townscape and Heritage
- Chapter 13: Landscaping and Public Realm
- Chapter 14: Energy and Sustainability
- Chapter 15: Transport and Servicing
- Chapter 16: Amenity
- Chapter 17: Other Considerations
- Chapter 18: Planning Obligations Heads of Terms and Community Infrastructure Levy
- Chapter 19: Summary and Conclusions

2.9 The Proposed Development, designed by 3XN and DSDHA, is summarised in Chapters 5, 11 and 13 of this Statement as well as in the Design and Access Statement (DAS) submitted as part of this application.

2.10 This Statement should be read in conjunction with the following documents which have been submitted in support of this application for planning permission:

- Planning Application forms, prepared by Gerald Eve LLP;
- CIL Form, prepared by Gerald Eve LLP;
- Covering Letter, prepared by Gerald Eve LLP;
- Site Location Plan, prepared by 3XN;
- Site Plan, prepared by 3XN;
- Floor Area Schedule, prepared by G+T;
- Existing, Deconstruction and Proposed Plans, Roof Plans, Sections and Elevations, prepared by 3XN;
- Phasing Plans, prepared by 3XN
- Existing and Proposed Landscape plans and sections, prepared by DSDHA;
- Accessibility Statement, prepared by David Bonnet Associates;
- Arboricultural Impact Assessment, prepared by SJ Stephens;
- Archaeological Desk-Based Assessment, prepared by Museum of London Archaeology ('MOLA');
- Basement Impact Assessment, prepared by Arup;
- Biodiversity Net Gain Assessment, prepared by Greengage;
- Circular Economy Statement, prepared by GXN & Sweco;
- Crime Impact Assessment, prepared by QCIC;
- Design and Access Statement, prepared by 3XN;
- Employment & Skills Strategy and Regeneration Statement, prepared by Volterra;
- Energy Statement, prepared by Arup;
- Daylight, Sunlight and Overshadowing Report, prepared by Point 2;
- Demolition Feasibility Study, prepared by GXN & Arup;
- Drainage and SuDS Strategy, prepared by Arup;
- Fire Statement, prepared by Arup;
- Flood Risk Assessment, prepared by Arup;
- Health Impact Assessment, prepared by Trium;



- Landscaping Statement, prepared by DSDHA;
- Noise Impact Assessment Report, prepared by Hann Tucker Associates Limited;
- Public Open Space Plan, prepared by DSDHA;
- Public Use Framework, prepared by Forth;
- Structural Statement, prepared by Arup;
- Sustainability Statement (including BREEAM, WELL Pre Assessment and Whole Life Carbon Assessment), prepared by GXN and Sweco;
- Statement of Community Involvement, prepared by London Communications Agency;
- Telecommunications Report, prepared by GTech;
- Transport Assessment, prepared by Velocity, including:
 - Car Parking Design and Management Plan, prepared by Velocity;
 - Draft Construction Management Plan, prepared by Velocity and Lendlease;
 - Draft Delivery and Servicing Management Plan, prepared by Velocity;
 - Operational Waste Management Strategy, prepared by Velocity;
 - Outline Travel Plan, prepared by Velocity;
 - Outline Site Waste Management Plan, prepared by Velocity;
- Ventilation Statement, prepared by Arup;
- Environmental Statement, prepared by Trium; including:
 - Volume 1, Chapter 1 (Introduction), prepared by Trium;
 - Volume 1, Chapter 2 (EIA Methodology), prepared by Trium;
 - Volume 1, Chapter 3 (Alternative and Design Evolution), prepared by Trium;
 - Volume 1, Chapter 4 (The Proposed Development), prepared by Trium;
 - Volume 1, Chapter 5 (Demolition and Construction), prepared by Trium;
 - Volume 1, Chapter 6 (Socio Economics), prepared by Trium;
 - Volume 1, Chapter 7 (Traffic and Transport), prepared by Velocity;
 - Volume 1, Chapter 8 (Air Quality), prepared by AQC;
 - Volume 1, Chapter 9 (Noise and Vibration), prepared by Hanntucker;
 - Volume 1, Chapter 10 (Daylight, Sunlight, Overshadowing and Solar Glare), prepared by Point 2;
 - Volume 1, Chapter 11 (Wind & Microclimate), prepared by Arup;
 - Volume 1, Chapter 12 (Climate Change), prepared by AQC & Trium;



- Volume 1, Chapter 13 (Effect Interactions), prepared by Trium;
- Volume 1, Chapter 14 (Likely Significant Effects and Conclusions), prepared by Trium;
- Volume 1, Chapter 15 (Environmental Management, Mitigation and Monitoring Schedule), prepared by Trium;
- Volume 2 (Townscape, Visual & Built Heritage Impact Assessment), prepared by Tavernor & Cityscape Digital;
- Volume 3 (Technical Appendices), and
- Non-Technical Summary, prepared by Trium.

3 Site and Surrounding Area

The Site

- 3.1 This Chapter describes the Site's location and surrounding context. The extent of the application Site is shown on the submitted Site Location Plan. Euston Tower is situated within the London Borough of Camden, in the ward of Regent's Park.
- 3.2 Euston Tower is situated in the heart of central London, on a prominent site on Euston Road at the junction with Hampstead Road. The site is located in the Central Activities Zone ('CAZ'), the vibrant heart and globally iconic core of London described in the London Plan as 'one of the world's most attractive and competitive business locations.' Additionally, the Site is located within Camden's Central London Area described in policy terms at a local level as a major business and employment centre and the main focus of Camden's economy and is located within the Knowledge Quarter Innovation District ('KQID') which spans from Camden Town to Holborn and Covent Garden and is home to a world-class cluster of scientific and knowledge based institutions and companies that specialise in areas like life sciences, data and technology and the creative industries. It is also located within the Euston Opportunity Area and adjacent to the Euston Growth Area which covers the area around Euston Station to the east of Hampstead Road.
- 3.3 The Euston Tower is not critically acclaimed as a distinguished work of architecture and has never been considered for listing by Historic England.
- 3.4 The Site is situated on the south-eastern corner of Regent's Place, to the east of Regent's Place Plaza. The Site is bounded by A501 Euston Road (south), A400 Hampstead Road (east), Brock Street (north) and Regent's Place Plaza (west).
- 3.5 The Site covers an area of 8,079sqm, comprising a single, ground plus 36-storey tower. The tower was built in the 1960s but is now largely vacant, save for retail uses currently in operation at ground floor level.
- 3.6 The Site does not fall within a conservation area ('CA'); however, the Fitzroy Square CA and Bloomsbury CA are both located to the south. Regent's Park CA is located to the west. There are no elements of the Site that are statutory or locally listed.

- 3.7 There are several buildings located within a close radius of the Site that are Grade I, Grade II and Grade II* listed. These include the Grade I & Grade II* listed buildings of Fitzroy Square and the Grade II listed BT Tower, both located to the south of the Site, as well as the Grade I Registered Park and Garden Regent's Park to the west of the Site.
- 3.8 The existing Euston Tower is noticeably visible in the following London View Management Framework ('LVMF') views:
- LVMF 2A.2: Parliament Hill: the summit; defining the left-hand side of the Protected Vista
 - LVMF 2B.1: Parliament Hill: east of the summit; outside the Protected Vista
 - LVMF 4A.2: Primrose Hill: the summit; outside the Protected Vista
 - LVMF 19.A1: Lambeth Bridge: partially visible.
- 3.9 The Site has a PTAL rating of 6b indicating 'excellent' transport connectivity. The Site is mainly served by Warren Street Underground Station (south), Euston Square Underground Station (east) and Great Portland Street Underground Station (west), with Euston Station and King's Cross and St. Pancras also being located to the east of the Site. There are also several bus routes that serve the site along Euston Road (south) and Hampstead Road (east).
- 3.10 Euston Station is planned to undergo a significant redevelopment. If Euston is ultimately determined to be the London terminus of HS2 this would be expected to result in London, and the Euston area, becoming more accessible, leading to an increase in footfall in the area.

Surrounding Area

- 3.11 The land surrounding the Site consists of a range of uses. Regent's Place comprises commercial, office, cultural and community land uses, as well as pedestrianised streets and public realm incorporated into the space. The closest residential properties are located along Brock Street / Drummond Street (north) and Hampstead Road (east). The Regent's Park Estate is situated to the north of Regent's Place.

The Knowledge Quarter

- 3.12 The Site is designated within the KQID, home to a world-class cluster of scientific and knowledge-based institutions and companies specialising in life-sciences, data and technology and creative industries.
- 3.13 The Knowledge Quarter Partnership was established in December 2014 to recognise and develop the area's strength as a thriving knowledge economy with world-class institutions in creative industries and sciences. The KQ is a consortium of partner organisations of different kinds but are all actively engaged in distributing knowledge. It is formed of numerous academic, cultural, research and scientific and media organisations, with its core vision described as 'transforming lives through innovation.' British Land was the first property company to join the Knowledge Quarter Partnership.
- 3.14 In recent years, institutions and organisations have clustered in the area surrounding King's Cross, St Pancras and Euston Stations and the area has seen tremendous growth owing to the excellent transportation links, highly skilled workforce, high-quality office and laboratory floorspace and the enhanced retail, art and cultural offer. Key institutions such as the British Library, UCL, the Wellcome Trust and the Francis Crick Institute anchor the area with other key occupiers like Google, Facebook and Deep Mind locating there. More recently, MSD has announced it will be opening its HQ and Discovery Centre in the Belgrove House development and other notable developments coming forward include Stanhope/Mitsui's British Library Extension project adjacent to the Francis Crick Institute. As a result, the KQ has established itself as the pre-eminent life science location in London.
- 3.15 The Science and Innovation Audit Report (2018), sponsored by the Department for Business, Energy and Industrial Strategy highlighted the KQ's role as arguably the densest concentration of scientific and knowledge-based organisations anywhere in the world, creating an 'incubator for the UK'.
- 3.16 The report identified aspects that drive the success of the KQ and confirmed the area's reputation as an international player in the following areas: i) Life sciences: Emerging infectious diseases, including antimicrobial resistance; musculoskeletal pathology associated with ageing; dementia; ii) Cultural, scientific and heritage collections: Digital archiving,

- curation and publishing; and iii) Data sciences: Machine learning, a form of artificial intelligence.
- 3.17 The report also highlighted the ‘gaps’ in the innovation ecosystem, all of which are space related, as follows:
- i) Low availability and high cost of appropriate commercial sites and premises.
 - ii) A dearth of innovation space, especially wet-laboratory space for Life Science start-ups and small businesses.
 - iii) A lack of suitable move-on space for companies wishing to expand operations/take on more staff.
 - iv) A lack of business accelerators for start-ups and other small firms.
- 3.18 The report highlighted the importance and sensitivities of the relationship of the existing residential communities within the KQ and the need for these local communities to benefit directly and equitably from long term growth.
- 3.19 The report recommended the preparation of a Knowledge Quarter Spatial Strategy (2050). “KQ 2050” was prepared jointly this year by Camden and Islington Councils in conjunction with the KQ Partnership and states that, “By 2050, we want the Knowledge Quarter to be and be known as the best place in Europe for collaboration, innovation, and research; a place that delivers inclusive opportunities for local residents, regardless of their means, to fulfil their social and economic potential within the KQ area.”
- 3.20 It goes on to say that “we encourage investments that safeguard and amplify the existing life-science expertise in London. To achieve this, immediate delivery of much-needed wet labs, innovation and incubation space, and related offices and amenities, is essential. Such investments will solidify London’s global standing as envisioned in the London Economic Recovery Framework building on the KQ as world-leading innovation campus that serves as a beacon and contributes to the regeneration and transformation of the CAZ. In return, this will create a broader range of opportunities for local communities.”
- 3.21 The London Property Alliance’s recent Knowledge Clusters report (November 2023) looks at the development of London’s knowledge clusters, including the KQ, over the last 5 years. It concludes that the fundamentals behind London as a life science supercluster are strong but there is still a shortage of space. Some 85% of London’s life science sector is made up of start-



- ups and SMEs, and London does not have the volume of space to accommodate these types of occupiers.
- 3.22 Support for the knowledge economy, including the life sciences sector, is clear at all political levels. The Chancellor of the Exchequer stated in 2023, “Life Sciences is one of the UK’s most successful sectors, worth over £94 billion to the UK economy in 2021, a 9% increase on the year before. As a key industry driving UK growth the Chancellor has identified it as a focus for government, ensuring regulation aids innovation, government funding is targeted at vital projects and investment is diverse. This also helps to deliver the Science and Technology framework through reforming regulation, boosting investment and driving up talent and skills.”
- 3.23 The Mayor of London, Sadiq Khan, has also expressed clear support for the life sciences sector in London, stating “London remains one of the most attractive places for life science companies to do business in the world and our great city will continue to lead the way in medical research and innovation... I am absolutely determined that this will continue, and that we not only retain the world’s best scientists but continue to attract them to our world-leading cluster of medical research institutions” (2016).
- 3.24 This application for Euston Tower seeks to build on London and the KQ’s strength as a London’s pre-eminent life science location by delivering a building for use by occupiers including start-ups and scale-ups to large employers that would support and contribute to the growth and success of the KQ and London as a world-class cluster of science and knowledge-based institutions.
- 3.25 The Proposed Development would meet the LBC’s ambitions for a successful ‘KQID’ which seeks to directly improve the lives of local communities in which the development sits environmentally, socially, and economically. From the outset, social impact has been positioned at the heart of the project with public spaces being designed to deliver a creative, social and ultimately flexible space for the local community. This includes local residents, community groups, knowledge organisations and businesses – to work together on shared challenges, encouraging community participation in science, technology and innovation.

4 Planning History

- 4.1 This Chapter outlines the Site's recent planning history. A full planning history has been included at **Appendix A** of this Statement.
- 4.2 On 8 August 2023 (ref. 2023/3265/P) a request was submitted for a scoping opinion, under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for the Proposed Development involving the partial demolition of the existing building (retention of central core, basement and foundations) and erection of a 32 storey building (mixed use including office floorspace, lab-enabled floorspace, flexible retail floorspace and community space), alterations to existing basement and improvements to public realm surrounding the building.
- 4.3 On 16 November 2023, LBC published the EIA Scoping Opinion decision notice, alongside the third-party (CBRE) advice report which provided independent assessment of the submitted EIA Scoping Opinion Report, prepared by Trium, on behalf of the Applicant.
- 4.4 A Certificate of Immunity from Listing ('COIL') was submitted in respect of the existing tower in July 2023 and at the time of submission is still pending (ref. 1487376).
- 4.5 On 30 April 2013 planning permission (ref. 2013/1103/P) was granted for the "Installation of a new shopfront and ATM to Hampstead Road elevation of existing ground floor retail unit (Class A1)". A Section 96a application to planning permission ref. 2013/1103/P was granted on 17 September 2013 (ref. 2013/5224/P) for the "Repositioning of ATM and alterations to the shopfront at ground floor level.
- 4.6 The Site is also subject to several smaller applications relating to display of signage, bicycle hire docking stations, and shopfront glazing.

Surrounding Planning History

- 4.7 On 25 March 2009 planning permission (Ref. 2007/0823/P) was granted at Regent's Place (North East Quadrant) (bounded by Hampstead Road, Drummond Street and Triton Square) for the "Redevelopment involving demolition of remaining buildings, basements and structures and the erection of 26 storey block comprising 101 private residential units plus an 8 storey block comprising 70 affordable units (Class C3) -both blocks positioned on top of a one storey plus mezzanine level podium-; a part 16, part 11, part 9 storey block comprising



- 47,168sqm Class B1 office floorspace, plus retail/financial & professional services/restaurant/pub or bar/community (Class A1 / A2 / A3 / A4 and D1) uses at ground floor, provision of basement and lower basement levels together with associated access, parking (comprising 182 parking spaces) , servicing, open areas and landscaping, alterations to and enlargement of Triton Square.”
- 4.8 At 1 Triton Square, directly to the west of the Site, planning permission (ref. 2016/6069/P) was granted on 21 November 2017 for the “Erection of 3 storey extension at roof (6th floor) level of 1 Triton Square to provide additional office floorspace (Class B1) with relocated plant above, creation of roof terraces at 6th floor level, reconfiguration of ground floor including infill of Triton Square Mall including flexible retail (A1, A3 and A4), affordable workspace (B1) and reprovision of gym (D2); erection of part 6, part 9 storeys residential building to provide 22 flats (10 x 3-bed, 11 x 2-bed and 1 x 1-bed) (Class C3) following demolition of St Anne's Church (Class D1); hard and soft landscaping including garden at junction of Longford Street and Triton Square; reconfigured vehicle and pedestrian accesses; and other ancillary works.”
- 4.9 At 20 Triton Street, also located to the west of the Site, planning permission (ref. 2010/6308/P) was granted on 01 February 2011 for “External alterations to terraces at 8th and 9th floor levels of office building (Class B1) involving; installation of timber pergola on 9th floor and timber screens on 8th floor, increasing timber decking on 8th floor and insertion of new doors on 8th floor south elevation.”
- 4.10 As part of the repositioning of Regent’s Place, planning applications have recently been approved at 338 Euston Road and 20 Triton for the installation of plant and equipment to create lab-enabled space to attract life science occupiers.

5 Development Proposals

5.1 This Chapter of the statement sets out the key aspects of the development proposals. A full description of the Proposed Development is provided in the Design and Access Statement, prepared by 3XN Architects.

5.2 The application seeks full planning permission for the following development proposals:

“Redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey building for use as offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces. Provision of public realm enhancements, including new landscaping, and provision of new publicly accessible steps and ramp. Provision of short and long stay cycle storage, servicing, refuse storage, plant, and other ancillary and associated works.”

5.3 British Land’s vision is to create a world leading science, technology and innovation building and public realm for Camden and the Knowledge Quarter that inspires, connects, and creates opportunities for local people and businesses. This would be achieved by:

- Transforming the existing Euston Tower ensuring it is fit for the future by adopting cutting-edge sustainability targets and reusing, recycling, and offsetting, where necessary, to reach net zero at completion and in operation.
- Putting social impact at the heart of the project from the start and ensuring that communities play a key role in shaping new spaces which meet local needs.
- Creating pioneering workspaces in the KQ for businesses of all sizes to prosper, including flexible incubator and accelerator spaces, to support start-ups, scale-ups and knowledge sharing.
- Ensuring that the future use of Euston Tower is built upon identified need and contributes to a thriving local, regional, and national economy for our ever-changing world.



- Reimagining the public spaces, creating safe, inclusive, connected and sustainable spaces for Camden's communities, though delivering an enhanced public realm connected with the tower redevelopment.
- Contributing towards meeting Camden's housing needs.

5.4 The Proposed Development responds to planning policy by providing much needed lab-enabled and office accommodation in the heart of central London and the KQ. The Proposed Development would also deliver substantial public benefits, designed to embrace the 'We Make Camden' ambitions through reducing inequalities and increasing life chances in neighbouring communities and maximising social value at pre application, construction, and end user phases.

Phasing

5.5 The proposal has been designed to be delivered in two phases:

- Phase 1: Deconstruction of the existing Euston Tower; and
- Phase 2: Construction of the new Euston Tower and associated public realm and landscaping works.

5.6 It is intended that a phasing condition would be included on the planning permission, such that planning conditions may be discharged in a proportionate manner relating to these phases of works.

5.7 It also intended that the Proposed Development is a phased development for the purposes of the Community Infrastructure Levy regulations 2010. This means that CIL payments would be linked to the commencement of phases the Development and payable in accordance with Camden's instalments policy thereafter.

Deconstruction

5.8 The Proposed Development seeks to retain the central core, basement and foundations of the existing Euston Tower, deconstructing the slabs and façade. It is envisaged that 31% of the existing structure would be retained. Opportunities for reuse, recycling and upcycling of the deconstructed material are being explored and are discussed further in Chapter 9 (Principle of Deconstruction) of this Statement.

Land Use Summary

5.9 The Proposed Development seeks planning permission for the following land uses:

Land Use	Existing (sqm GIA)	Proposed (sqm GIA)	Uplift (+/-)
Office (Class E(g(i)))	53,771	50,295	-3,476
Lab Enabled (Class E(g)(ii))	0	24,496	+24,496
Retail (Class E)	1,055	748	-307
Retail/Community Space (Class E/F)	0	2,003	+2,003
Total	54,826	77,542	+22,716

Table 1: Existing and Proposed Land Use Areas, (G+T Area Schedule, dated 7 December 2023)

(Note that the basement areas have been apportioned to the above uses)

5.10 The proposals lead to a total floorspace uplift of 22,716sqm (GIA).

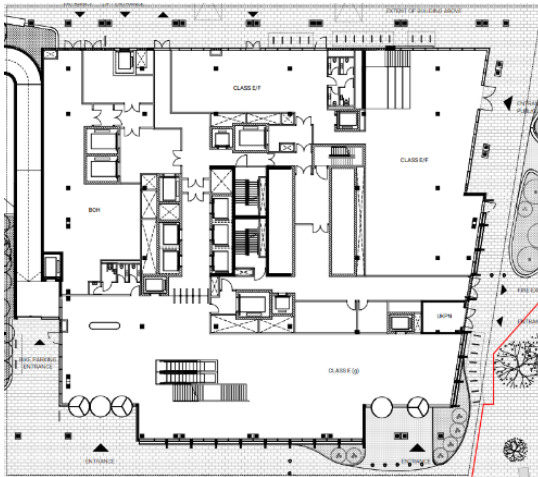
Level	Use	Area (sqm)
Basement	Back of house and servicing facilities	5,678
Levels G-2	Office lobby, cafe and publicly accessible Neighbourhood Lab	6,074
Level 3	Accelerator Space	2,670
Levels 4-11	Lab enabled space	19,939
Levels 12-30	Office space	42,886
Level 31	Plant and lift services	294

Table 2: Proposed Areas Split by Floor (G+T Area Schedule, dated 7 December 2023)

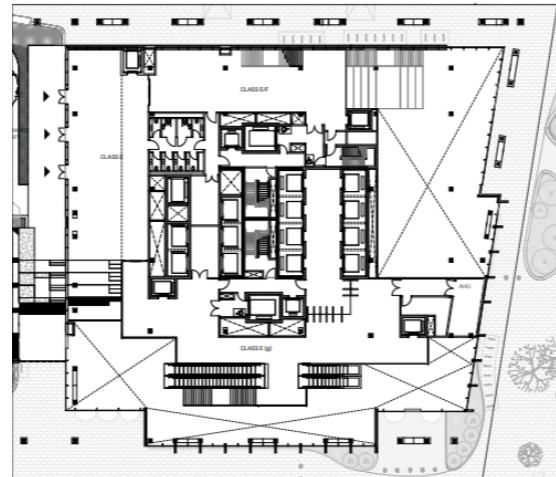
5.11 The building has been designed in two distinct elements, the podium at the base of the building which interfaces with the new public realm surrounding the site, and the tower. The podium comprises entrances to the tower and the public uses within the building as part of, the Neighbourhood Innovation Lab, and the Accelerator Space, lab-enabled space and offices located in the tower itself.

Podium

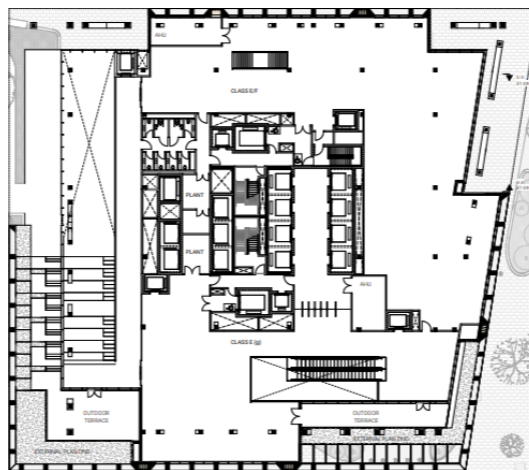
- 5.12 The podium comprises the ground, first, second and third floors of the proposed building. The podium has a larger footprint in comparison to the tower above and at ground floor level, provides shelter from the wind and rain. The proposed ground, first and second floor plans are below for clarity.



Proposed Ground Floor Plan



Proposed First Floor Plan



Proposed Second Floor Plan

- 5.13 The ground, first and second floors of the podium are split roughly in two halves, the southern half comprises the main entrance to the office and lab spaces, with entrances on the southern elevation (on Euston Road) together with a prominent cycle entrance to the west. This element of the podium functions as the gateway to the lift lobbies serving the tower levels, which comprise the office and lab-enabled workplaces. These publicly accessible lobbies also accommodate areas for reception, wayfinding, and retail spaces. The ground level lobby includes



- space for a cafe / F&B offer which would serve and activate the space. The lobby design seeks to provide a versatile environment for both formal and informal gatherings, providing opportunities for individuals or groups to meet and collaborate.
- 5.14 The northern part of the podium comprises publicly accessible space at ground floor with the primary entrance to the Neighbourhood Innovation Lab located on the northeastern corner on Hampstead Road. This leads to a double height, flexible exhibition space, with large amphitheatre style stairs leading up to the first floor where there is an open space for social interaction, meeting and collaboration. This leads to a café, which opens out onto the external stairs and ramp, with views out onto Regent's Place Plaza, the public realm that is to be delivered as part of the Proposed Development and is a space for the community to enjoy.
- 5.15 The second floor provides working spaces to develop ideas and projects important to the local community. It would provide a variety of different sized rooms for working, workshops and training as well as shared facilities which could include an innovation library, and media suites for use by a variety of local groups.
- 5.16 The third floor would provide 2,670sqm (GIA) of fully fitted lab-enabled accelerator floorspace. This floor would be rented to smaller, start-up and scale-up businesses in the life sciences and innovation sector.
- 5.17 This space would already be fully fitted out, removing the barrier of high up-front fit-out costs associated with lab-enabled floorspace and support the growth of SME's within the KQID, whilst creating a collaborative and knowledge-sharing environment with other businesses within the sector.

Tower

Lab Enabled Space

- 5.18 Lab-enabled floorspace would be provided across Levels 04-11 of the tower, offering a specialised environment for science and research which would seek to anchor the western end of the Knowledge Quarter. These levels would feature a dual functionality, with dedicated labs on the northern half of the floorplate and write-up space on the south. These spaces would be flexibly designed to accommodate one or two tenants, ensuring future adaptability to the evolving needs of scientific research and development.



- 5.19 Levels 04-11 would provide specialised lab-enabled floorspace for science and research. These floors provide greater floor to floor heights (at 4.08m in comparison to the office floor to floor heights of 3.8m) which allow space for the diversity and extent of services required for lab-enabled floorspace.
- 5.20 The lab-enabled spaces would be designed to accommodate both dry and wet lab activities. Dry lab activities include software and hardware engineering, prototyping workshops and low-grade optical physics. The spaces would also be designed to accommodate contaminant levels 'CL1-2', covering the use of non-hazardous and low-to-medium risk hazardous agents.

Office Space

- 5.21 Office space would start from Level 12 and extend up to Level 30, offering a flexible and versatile environment around a central core.
- 5.22 The floor plates can be subdivided to accommodate one, two, or three tenants, providing a tailored and adaptable setting that aligns with the diverse requirements of modern and future businesses.

Basement

- 5.23 The existing basement below Euston Tower is being retained and partly extended through the addition of a new smaller level 02 basement (below the existing basement 01) to create additional plant space.
- 5.24 The basement would continue to provide space for back of house facilities, including cycle parking, showers and lockers, together with waste storage areas and two blue badge car parking spaces (aligned with the car-free nature of the development).

Vertical Transportation

- 5.25 The tower's vertical transportation ('VT') strategy has been developed with due consideration to parameters such as the number of levels served, total occupancy ratio and use distribution. This has resulted in two VT strategies working in tandem, with single-deck lifts serving the lab-enabled levels and double-deck lifts serving the mid-rise and high-rise office levels.



- 5.26 This approach, requiring two types of lifts, demands an entrance lobby split over two levels. To that end, the single-deck lifts serving the lab-enabled levels are accessed through the ground floor lobby.
- 5.27 These single-deck lifts stop on each floor of the lab-enabled levels.
- 5.28 Double-deck lifts are accessed through lobbies at Levels 01 and 02. The double deck lifts are divided into stops either on odd or even levels. Upon entry building users would be guided to the relevant lobby depending on the required destination level.

Access

- 5.29 There are five main entrances (four at ground floor, one at first floor). Two lobby entrances are located to the south at Euston Road. The primary entrance to the public (Neighbourhood Innovation Lab) space is from Hampstead Road to the east with a secondary entrance from Brock Street to the north, both at ground floor level. There is also an accessible entrance to the café and public spaces at first floor level via the external staircase and ramp, accessed from Regent's Place Plaza to the west.
- 5.30 Two passenger lifts are provided in the office lobby areas. The lift location near the main entrance serves the ground floor up to Level 03 and the other lift location near the secondary entrance provides access to Basement 01 and up to Level 03. Both lifts would be wheelchair accessible and provide an alternative, accessible route to access the lifts lobbies on levels 01 – 02.

Amenity Spaces

- 5.31 Double-height amenity spaces are located at Levels 7, 11, 19, 25 and 30. They provide architectural relief in the façade and a space for occupiers to enjoy.
- 5.32 These spaces are to be used as internal tenant amenity, with exterior planters on four of the terraces. The terrace at level 19 has an external amenity terrace. Each double-height space wraps around the corners of the building and is visible from two elevations.

Design Concept

- 5.33 The overall concept for the design of the Site is to create a landmark tower within Camden. The proposed tower takes inspiration from the pinwheel plan of the existing tower and comprises four, tapered quadrants across its four elevations.
- 5.34 The key conceptual approach taken in plan form is the utilisation of the central core which allows for maximum levels of daylight, contributing to the provision of high-quality floorplates. The four quadrants in plan allow for greater flexibility relating to the type of workspaces able to be offered to future occupiers.
- 5.35 The proposed massing of the podium level responds to the local context which the Site sits within. The Proposed Development concept seeks to create an accessible, permeable, and engaging space over ground plus Levels 01-02 and would act as the anchor for the public uses within the Proposed Development.

Materiality

- 5.36 The proposed building has been designed having regard to its local context and its wider setting in Camden.
- 5.37 The primary material in the proposed Euston Tower is Glass Reinforced Concrete ('GRC'). The common threads in the local area are red brick, warm natural stones and vertical proportions. The Proposed Development seeks to draw on these common threads to create a unique but respectful language for the proposed Euston Tower - a language that is inherently embedded in Camden, and which creates a recognisable landmark on London's skyline. The proposals respond to this context through proposing a desaturated terracotta colour, sensitive to and in keeping with the local context.

Public Realm and Landscaping

- 5.38 Landscape architects, DSDHA, have designed a comprehensive public realm scheme which is safe, welcoming, creative and sustainable, with areas to sit and relax. The public realm has been designed to be educational and playful and would significantly improve the quality and biodiversity of the public realm.

- 5.39 The scope of the application boundary extends into Regent's Place Plaza to the west, Brock Street to the north, Euston Road to the south and Hampstead Road to the east. The public realm includes the ground floor external areas, the proposed steps and ramps on the western side of the building fronting the plaza and terraces throughout the proposed building.
- 5.40 Landscaped mounds are proposed throughout the Plaza, in response to the lack of available soil on the site given the basement located directly underneath.
- 5.41 External greening is incorporated into the scheme to provide opportunities for biodiversity throughout the building. These amenity terraces are at levels 3, 4, 7, 11, 19 and 25 and 30.
- 5.42 Hostile vehicle mitigation ('HVM') security bollards and wind mitigation features would be provided throughout the public realm.

Biodiversity Net Gain ('BNG')

- 5.43 The Biodiversity Net Gain for the site is targeted to be over 26%.

Urban Greening Factor ('UGF')

- 5.44 The Urban Greening Factor score is targeted to be over 0.3.

Cycle Parking

- 5.45 A total of 951 long and short stay cycle spaces are provided as part of the Proposed Development. 861 long stay cycle spaces would be in the basement of Euston Tower, which would be accessed via a ramp to the south. These comprise the following:
- 646 two-tier parking (75%);
 - 86 foldable bicycle parking (10%);
 - 86 Sheffield stands (10%); and
 - 43 enlarged Sheffield stands (5%).
- 5.46 Both male and female changing facilities would be located adjacent to the long-stay cycle parking and would provide 574 lockers which equates to 2 lockers per 3 parking spaces. There

would be 72 showers provided on-site which equates to 1 shower per 12 parking spaces, as well as 6 toilets, 2 of which would be accessible.

- 5.47 A total of 90 short stay cycle spaces would also be provided in the form of Sheffield Stands and these would be located throughout the public realm within the application boundary.

Office and Retail deliveries

- 5.48 The existing access and vehicle routes to the servicing areas at basement level would be retained for Euston Tower and Brock Street and Regent's Place Management would continue to manage the entire basement area. There would be a reduction in one 8m loading bay to accommodate refuse storage at service yard level.

Life Science Deliveries

- 5.49 Life sciences require specialist bottled/liquid gas deliveries along with the regular deliveries.
- 5.50 The liquid and bottled gas deliveries cannot take place within the basement and need to be at ground level. All specialist delivery activity is proposed to be to the northwest corner of the building, with the public realm scheme proposals having been designed to facilitate this whilst maintaining pedestrian flows. Further details are provided in the Transport Assessment.

Cargo Bike Deliveries

- 5.51 Deliveries made by larger cargo bikes or quadracycles would enter the Proposed Development via the existing basement ramp. Within the basement, two cargo bike parking bays would be provided.

Circular Economy

- 5.52 The Proposed Development incorporates a range of Circular Economy principles relating to the retention of the existing building and the reuse, recycling and upcycling of materials from deconstruction. These principles include:
- retaining 31% of the existing structure in situ;
 - minimising waste in deconstruction and construction;

- minimising waste in operate and end of life;
- seeking to reuse, upcycle and recycle materials at their highest value

Energy and Sustainability

5.53 The Proposed Development achieves an overall reduction in regulated carbon dioxide emissions of 14% over Part L 2021.

5.54 The Proposed Development includes a range of sustainability strategies and approaches which are summarised below:

- Proposal targets BREEAM 'Outstanding' for the office floorspace, with BREEAM 'Excellent' for the retail areas.
- Use of green/blue roofs, in addition to biodiverse features in the landscaping.
- Mitigation to reduce the urban heat island effect include green roofs, public realm planting and planting across terraces.
- The proposal has been designed to be air quality neutral.
- The development is entirely car free, save for two Blue Badge spaces.

Housing

5.55 A potential off-site housing solution at 7-9 William Road which could provide 9 affordable units has been discussed with LB Camden and was consulted upon publicly. However, the conversion of 7-9 William Road is inefficient from a housing delivery perspective while also being disproportionately costly to deliver. Following further discussions with the Council, it has been concluded there is a potential to deliver more affordable housing, including more family-size units, within the Borough, through a Payment in Lieu to be directed towards the delivery of affordable housing by the Council on a Council owned site, to be secured via Section 106 legal agreement. Discussions with the Council regarding the Payment in Lieu will continue post submission of the application.

6 Pre-Application Engagement and Consultation

- 6.1 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.
- 6.2 In respect of pre-application engagement, Paragraph 39 of the NPPF confirms that “early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.”

Policy Context

- 6.3 LBC adopted a Statement of Community Involvement (‘SCI’) in 2006 and this was last revised in 2016. The document sets out how LBC would involve local people, local businesses and other key organisations and stakeholders when they prepare planning policies and consider planning applications.
- 6.4 Paragraph 38-46 of the NPPF highlights the importance of pre-application engagement and front loading; early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves outcomes for the community.
- 6.5 It is also encouraged that any applicants who are not already required to do so by law engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their planning application.

Consultation Strategy

- 6.6 Consultation is recognised as an essential tool for balancing the views and needs of different interest groups and securing mutually compatible solutions and as such has played an important role in the evolution and preparation of this planning application.

- 6.7 The SCI prepared by London Communications Agency ('LCA') outlines the engagement strategy undertaken in respect of the Proposed Development, the activities that have taken place and analysis of the feedback received over the course of the engagement process.
- 6.8 The feedback received has been fully considered as part of the development evolution and the Applicant is committed to continuing to work and consult with the local community throughout the planning determination period. Where feedback has not been incorporated into the development proposals, the submitted SCI provides explanation of this and outlines how key concerns have been addressed.

Engagement with LB Camden

- 6.9 The Proposed Development has been subject to extensive pre-application consultation with LBC planning, design, highways, security, access, waste and sustainability officers over a twenty month period. The proposals have evolved throughout the period to incorporate comments raised by officers. Further details are contained within the Design and Access Statement.

Strategic Panel

- 6.10 The consultant team met with LB Camden's Strategic Panel on 12 June 2023. Members acknowledged the challenges associated with the existing building and welcomed the proposal to provide public uses in the podium. Members were keen to ensure that the building is inviting to all, including young people, and requested further information on the housing offer.

Design Review Panel

- 6.11 Two Design Review Panel ('DRP') meetings were held on 26th May 2023 and 29th September 2023. Comments were raised for the architectural, sustainability and landscaping teams to investigate further. Comments related to embodied carbon, scale, mass, façade design, colour and the public realm.
- 6.12 The design team has sought to address these comments and further information on how this feedback has been addressed is contained within the Design and Access Statement.

Development Management Forum

- 6.13 A Development Management Forum ('DMF') was held on 18th October 2023 where the proposals were presented to the local community. The proposals were well received and comments were raised regarding the future of office working, public realm opportunities for children and the colour of the façade.

Developer's Briefing

- 6.14 A Developer's Briefing was held with members of LBC's Development Management Committee on 27 November 2023. Comments raised related to affordable housing provision, the public spaces in the building, the need for the public realm to be accessible to all, wind and microclimate and the reuse and recycling of materials was.

Statutory Stakeholder Engagement

- 6.15 Consultation with the following statutory bodies was undertaken during the course of the pre-application process.

Greater London Authority ('GLA')

- 6.16 Three pre applications meetings have been held with the GLA. The first meeting was held in June 2023, where the principle of the proposals was discussed with officers. A follow up meeting in August 2023 discussed the key views and LVMF constraints. A third pre application meeting was held in September 2023 which went into detail on the sustainability, energy and Circular Economy principles of the scheme. Officers welcomed the partial retention and refurbishment of the proposals subject to understanding in full the Whole Life Carbon Assessment (the preliminary Whole Life Carbon Assessment was welcomed).
- 6.17 GLA officers requested further information regarding landscaping enhancements and the Urban Greening Factor. It was recommended that the planning application would need to address the principle of demolition, land uses, affordable workspace, affordable housing, urban design, heritage, sustainable development, environmental issues and transport, in accordance with the London Plan.

Transport for London ('TfL')

- 6.18 A pre application meeting was held in September 2023 where the proposed scheme and public realm improvements were discussed, and subsequent meetings have been held with relevant parties at TfL. TfL was satisfied with the Hampstead Road frontage and requested further information relating to the Euston Road pedestrian and cycling proposals. TfL officers supported the public realm concept. TfL also confirmed that there is capacity on the public transport network to accommodate the scheme proposals.

Historic England ('HE')

- 6.19 A pre application meeting was held in September 2023 to discuss the proposal and feedback was provided in November 2023. Historic England considered that the existing building detracts from the Fitzroy Square Conservation Area and imposes on some areas of Regent's Park. The proposal is broader than the existing building and considerations were raised regarding the impact of the new design of the building on important surrounding heritage assets; in particular, on the Fitzroy Square Conservation Area and the listed buildings within it. The feedback advised that although substantial changes were not required, alternative colours and finishes should be explored further to ensure that the building causes no more harm than the existing building. Responses to these comments are set out within the Design and Access Statement.
- 6.20 An application for a Certificate of Immunity from Listing has also been submitted to Historic England in respect of the existing tower (ref. 1487376) and at the time of submission is still pending.

Community Engagement

- 6.21 Feedback received from the local community has been incorporated into the design as the development proposals have evolved. The Applicant and design team have committed to understanding the views of local residents and amenity groups through thorough engagement relating to the site and development proposals since December 2022.
- 6.22 The consultation activities undertaken have been carried out in accordance with LBC's SCI guidance and have sought to reflect the key objectives set out within the Localism Act (2011) and National Planning Policy Framework (2023).

6.23 The SCI states that “the engagement programme was designed to empower residents and stakeholders to shape the design outcomes of Euston Tower and the associated public spaces at ground level. This included close working and collaboration between the community and project team, with the architects being in attendance at each and every community focused workshop as part of this engagement. The programme was designed to create additional social impact through the creation of paid employment and local commissions, building cultural capital and capacity, all whilst connecting people to the Euston Tower project.”

Co-Design Workshops

6.24 Workshops and events were held to engage local stakeholders and partners in an open dialogue to voice their thoughts and be part of the design process. Across the three workshops, the Applicant and Design Team engaged with a total of 150 attendees.

6.25 Focused co-design workshops were held, with a panel event held two weeks later that shared the findings and conclusions. The design team set out principles and priorities that were being explored as part of the evolving design, gathering feedback and ideas for further consideration.

6.26 The series of workshops and panel discussions were grouped into three key themes, focussed on the areas deemed most impactful by the community. These themes were:

- Inclusivity in the Public Realm;
- Interior Public Spaces & Programming; and
- Exterior Public Spaces & Programming.

6.27 Views on the interior spaces and programming were shared through an interactive model of Euston Tower. The inclusivity of the space was widely discussed, and the importance of creating spaces for young people and families was highlighted by attendees. The findings of these workshops have informed the proposed design.

Sustainability Workshop

6.28 A Sustainability Workshop was held on 4th July 2023. This was a dedicated public engagement session and was held to engage the public on how sustainability has informed the proposals

for Euston Tower and the role that buildings and cities play in the transition towards a low carbon and circular economy.

- 6.29 The session consisted of a presentation to attendees, followed by a tour of the existing Euston Tower.

Public Exhibitions

- 6.30 Public exhibition events were held between 8 July and 21 July 2023, with dedicated events for immediate neighbours, the wider community and co-design participants. Drop-in sessions were held on weekdays and weekends to ensure that as many people as possible had an opportunity to meet the team and view the proposed designs for Euston Tower.

- 6.31 A total of 105 people attended the five exhibitions events and drop-in sessions in July, with 43 completed feedback forms of which 27 were from local residents. The proposals were widely supported with 34 people scoring either 4 or 5 on a scale of 1-5 (1 being opposed and 5 being strongly supportive) when asked if they support the proposals for Euston Tower. On specific amenities and design principles that should be prioritised in the proposals, public toilets and accessibility were among the most common answers. When asked on scale of 1-5 (1 being not supportive and 5 being very supportive) how supportive are you of the proposals for improving the public spaces, 35 people scored either 4 or 5.

- 6.32 A further public exhibition was held between 14 October and 21 October 2023 where aspects of the design that had been refined following feedback received from the July exhibition were presented. There were a of total of 189 attendees across six public events held in October.

- 6.33 In addition to the public events, a dedicated consultation website was launched in July 2023 and has been viewed by 2,932 people in total. In person and virtual meetings were also offered to local amenity groups.

Summary of feedback received and changes made to the Proposed Development

- 6.34 In total, over 570 people attended the public consultation events.

- 6.35 Of those respondents who left feedback:

- a) 71% of people support or strongly support the developed designs for Euston Tower, with no-one saying they were opposed.

- b) 71% of people support or strongly support the revised designs of the Euston Tower building.
- c) 60% of people agreed or strongly agreed that the developed designs for the public realm have responded to feedback from the local community.

6.36 The following themes that have come out of the public consultation have fed into the design evolution:

- a) Requirement for shelter from wind and rain in the public realm;
- b) Adaptable spaces that support social and cultural activities;
- c) Opportunities in education or otherwise for young people and children;
- d) Publicly accessible to all;
- e) Contribute to the supply and social housing;
- f) Better connectivity and routes; and
- g) A community hub that can accommodate a variety of existing local groups.

6.37 The key changes made to the scheme in response to feedback received included:

- a) Altering the podium design and public realm interfaces;
- b) Updating the entrances and enhancing the permeability of the building;
- c) Evolving the design and programming of the public spaces;
- d) A reduction in the width of the building;
- e) Desaturating the colour of the building; and
- f) Enhanced greening and planting.

7 Planning Policy Framework and Legislation

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the Levelling Up and Regeneration Act ('LURA') (2023) requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 7.2 Planning policy operates at national, regional, and local levels. At a national level, Government adopted the National Planning Policy Framework (NPPF) in March 2012. The latest updates to the document were published in September 2023.

National Planning Policy Framework (2023)

- 7.3 The (NPPF) sets out core planning principles that underpin both plan-making and decision taking. It is a material consideration in the determining of all planning applications.
- 7.4 The purpose of the planning system is to contribute to achieving sustainable development. The NPPF explains that the policies of the NPPF taken as a whole constitute what the Government considers sustainable development to mean in practice.
- 7.5 The presumption in favour of sustainable development is intended to ensure that the planning system focuses on opportunities for positive growth, making economic, environmental and social progress for current and future generations. The presumption, in practice, means that significant weight should be placed on the need to support economic growth through the planning system and local planning authorities should plan positively for new development and approve all individual proposals wherever possible. However, development should not be allowed if it would undermine the key principles for sustainability in the NPPF. The NPPF makes clear that the policies should apply "unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits" (paragraph 11(b)). Specifically, paragraph 81(b) states that the planning policies positively and proactively encourage sustainable economic growth.

Planning Practice Guidance, 2014 (as amended)

- 7.6 The Planning Practice Guidance was first produced and published by the Department of Communities and Local Government ('DCLG') in March 2014 to cover a range of topics which have been varied and supplemented on a number of occasions since.

The Statutory Development Plan

Regional Planning Policy

- 7.7 The London Plan was published on 2 March 2021 and is the Spatial Development Strategy for Greater London, setting a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The London Plan forms the London wide policy context within which the boroughs set their local planning policies and forms part of the Statutory Development Plan.

- 7.8 The LVMF (2012), whilst not part of the Development Plan, is a Supplementary Planning Guidance ('SPG') document which designates, protects, and manages twenty-seven views of London and some of its major landmarks. The purpose of the document is to explain in greater detail the views and policy approach so that boroughs, applicants, and other statutory authorities can assess a proposal's compliance with the London Plan.

Local Planning Policy

- 7.9 At the local level, LBC's Local Plan (2017) was adopted by the Council on 3 July 2017, replacing the Core Strategy and LBC Development Policies documents. This, coupled with LBC's Site Allocations Plan (2013), forms the local tier of the Development Plan and is therefore central to planning decisions and the control of future developments in the Borough.

- 7.10 The Euston Area Plan (2015) was adopted in January 2015 following joint contribution from Camden Council, the GLA and TfL. The document provides a single strategic plan designed to help shape change in and around the area surrounding Euston Station up to 2031. The overriding vision of the Plan is to secure the best possible future for local residents, businesses and visitors to Euston following completion of the HS2 development.

Site Designations

7.11 The key planning policy designations relating to the Site are summarised below:

- Central Activities Zone (CAZ)
- Euston Opportunity Area;
- Local Plan Central London Area ('CLA');
- Euston Area Plan;
- Regent's Place Plaza is identified as 'Local Open Space';
- Crossrail 2 Safeguarding Area;
- Air Quality Focus Area (Marylebone Road from Marble Arch/Euston/King's Cross Junction)
- Designated View – 2A.2 Parliament Hill summit to the Palace of Westminster;
- Designated View – 2B.1 – Parliament Hill oak tree to Palace of Westminster;
- Designated View – 4A.2 – Primrose Hill
- Designated View – 19.A1 Lambeth Bridge
- Adjacent to Euston Growth Area.

Other Material Considerations

Supplementary Planning Guidance

7.12 The following LBC Supplementary Planning Documents ('SPDs') are relevant to this application and form material considerations in the determination of the application:

- Camden Planning Guidance – Access for All (March 2019);
- Camden Planning Guidance – Air Quality (January 2021);
- Camden Planning Guidance – Amenity (January 2021);
- Camden Planning Guidance – Community Uses, Leisure and Pubs (January 2021);
- Camden Planning Guidance – Design (January 2021);
- Camden Planning Guidance – Developer Contributions (March 2019);
- Camden Planning Guidance – Employment Sites and Business Premises (January 2021);
- Camden Planning Guidance – Energy Efficiency and Adaptation (January 2021);
- Camden Planning Guidance – Public Open Space (January 2021);

- Camden Planning Guidance – Transport (January 2021);
- Camden Planning Guidance – Water and Flooding (March 2019).

7.13 The following GLA documents are also material considerations:

- Accessible London: Achieving an Inclusive Environment LPG (October 2014);
- Central Activities Zone (March 2016);
- Optimising Site Capacity: A Design-Led Approach LPG (June 2023);
- Urban Greening Factor LPG (February 2023);
- Circular Economy Statement LPG (March 2022);
- Whole Life-Cycle Carbon Assessments (March 2022);
- ‘Be Seen’ Energy Monitoring LPG (September 2021);
- Air Quality Neutral / Positive LPG’s (February 2023);
- Sustainable Design and Construction (April 2014);
- Energy Planning Guidance (updated June 2022);
- Sustainable Transport, Walking and Cycling LPG (November 2022).
- The Control of Dust and Emissions during Construction and Demolition (July 2014).
- Fire Safety Guidance (Draft 2022)

Emerging Planning Policy

7.14 In 2020, LBC consulted on its Draft Site Allocations Local Plan. The plan identifies several key development sites and areas across LBC, including the KQ (Draft Policy KQ1).

7.15 LBC is now undertaking a Local Plan Review which will incorporate the draft Site Allocations Local Plan. It is anticipated that the draft Local Plan Review will be consulted on in early 2024. This document should be given weight as an emerging plan in accordance with paragraph 48 of the NPPF.

7.16 The Euston Area Plan was adopted in 2015 and LBC has been working on its revised draft Euston Area Plan. However, due to current uncertainty surrounding HS2, work on this draft document has paused until there is greater certainty around the long-term future of HS2 and Euston.

Key Planning Considerations

7.17 The key planning considerations associated with the Proposed Development are:

- a) Principle of Development;
- b) Principle of Deconstruction;
- c) Land Use;
- d) Design;
- e) Townscape and Heritage;
- f) Landscaping and Public Realm;
- g) Energy and Sustainability;
- h) Transport and Servicing;
- i) Amenity;
- j) Other Planning Considerations;
- k) Planning Obligations and CIL.

7.18 The following section of this Planning Statement addresses each of the key planning considerations a-k, having regard to the Development Plan as a whole, and any relevant material considerations.

8 Principle of Development

8.1 This Chapter assesses the wider principle of development against the relevant planning policy.

National Planning Policy

8.2 Sustainable development is at the very heart of the National Planning Policy Framework. Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved.

8.3 Paragraph 8, Chapter 2 of the NPPF sets out how the planning system can contribute to achieving sustainable development. One of the three overarching objectives is based around economic enhancements ‘to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity’.

Regional Planning Policy

8.4 Chapter 1 of the London Plan sets out how growth should be managed in the capital to build 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.

8.5 The site is in the Euston Opportunity Area. Opportunity Areas are identified as significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Euston is identified in the Mayor’s London Plan as an Opportunity Area (OA) with potential for 3,800 new homes and 15,000 new jobs by 2041.

8.6 Policy SD1 (Opportunity Areas of the London Plan) states that the Mayor will seek to ensure that OA’s fully achieve their growth and regeneration potential through the support of regeneration and identification of specific infrastructure that unlocks capacity for new homes and jobs. Part B of the Policy states that Boroughs should take into consideration the capacity for growth within each OA by assessing the indicative capacity provided for new homes and jobs, as set out in the London Plan.

8.7 Policy SD4 (The Central Activities Zone (CAZ)) of the London Plan states that the unique, strategic functions of the CAZ, including nationally and internationally significant office floorspace, should be promoted and enhanced. Part B confirms that the intensification and provision of sufficient office



space within the CAZ should be supported and enhanced by all stakeholders to ensure that the demand for a wider range of types and sizes of occupier and rental values is provided.

- 8.8 Part G of Policy SD4 confirms that specialist clusters and centres of excellence within the CAZ, including functions of state, health, law, education, creative and cultural activities should also be supported and promoted.
- 8.9 London Plan Policy GG1 (Building strong and inclusive communities) encourages development to seek to ensure changes to the physical environment achieve an overall positive contribution to London.
- 8.10 Part C of London Plan Policy GG2 (Making the best use of land) sets out that development should proactively explore the potential to intensify the use of land to support additional workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. London Plan Policy GG2(D) highlights that proposals should use a design-led approach to determine the optimum development capacity of sites.
- 8.11 Part E of London Plan Policy GG5 (Growing a good economy) seeks to ensure that London continues to be a leader in innovation and research, supporting its role as an international hub for learning.
- 8.12 Part A of London Plan Policy D3 (Optimising site capacity through the design-led approach) reiterates that all development must ensure the best use of land by following a design-led approach that optimises the best capacity of land by ensuring that development is of the most appropriate form and land use for the site.
- 8.13 Part B of London Plan Policy D1 (London's form, character and capacity for growth) sets out steps for using a particular area's characteristics to establish the capacity for growth of different areas and ensure that sites are developed to an optimum capacity that is responsive to the site's context and supporting infrastructure.
- 8.14 LPG: Optimising Site Capacity: A Design-Led Approach (2023) seeks to build on Part B of London Plan Policy D1 and ensures placemaking is prioritised by capitalising on the insight and knowledge of local communities. This should involve meaningful and upfront engagement and collaboration with local communities, organisations and businesses, to ensure they have a greater say on the type of development in their local area at the plan-making stage.



- 8.15 The Central Activities Zone SPG (2016) sets out the aspirations of the CAZ and supplements London Plan policies. It recognises that to accommodate projected growth in employment and ensure that the CAZ, north of the Isle of Dogs and Tech City remain globally competitive, London Plan Policy SD4 should be implemented in ways that promote and incentivise office and other CAZ strategic functions.

Local Planning Policy

- 8.16 Policy G1 (Delivery and location of growth) of Camden's Local Plan (2017) sets out how the Council will create the relevant conditions for growth in order to deliver homes, jobs and infrastructure by supporting development that makes the best use of the development land, providing a mix of uses in accessible parts of the Borough (including self-contained housing) to deliver 16,800 new homes, 695,000sqm of new office floorspace and 30,000 sqm of new retail floorspace by 2031.
- 8.17 The Council anticipates that the most significant growth will be delivered through the key growth areas across the borough. These growth areas include King's Cross, Euston and Tottenham Court Road.
- 8.18 Part E of Policy E1 (Economic development) of the Local Plan also seeks to support the development of Camden health and education sectors by promoting the continued development of the KQ within the Euston and King's Cross areas. Supporting Paragraph 5.23 of the Local Plan confirms that Camden will support the development of the science and creative industries to contribute towards the thriving knowledge economy that currently exists within the KQ around Euston and King's Cross.
- 8.19 Part F of Policy E1 seeks to direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031.
- 8.20 Part G of Policy E1 seeks to support Camden's industries by (inter alia):
- Safeguarding existing employment sites and premises in the Borough that meet the needs of industry and other employers; and
 - Supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 of the Local Plan.



- 8.21 Policy E2 (Employment premises and sites) of the Local Plan seeks to encourage the provision of employment premises and sites in the Borough. It is noted that LBC will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents.
- 8.22 Part F of Policy E2 states that Camden will consider higher intensified redevelopment of premises or sites that are suitable for continued business provided that the proposed premises includes floorspace suitable for start-ups, small and medium sized enterprises including managed affordable workspace where viable.

Assessment

- 8.23 The Site is located within the CAZ, Euston Opportunity Area and is adjacent to the Euston Growth Area, one of Camden's and London's most strategically important, and thriving, economic areas. Maintaining, protecting and promoting the development capacity of these areas is a central thread running through national, regional and local planning policy. Being located within the CAZ, the Mayor also seeks to promote and incentivise office and other CAZ strategic functions in this location. The Proposed Development is therefore in line with London Plan policies SD1 and SD4, and the Central Activities Zone SPG objectives.
- 8.24 Given the site's central location it is ideally located for intensification to optimise the use of the site and enhance the physical environment, which in turn can make a positive economic, social, and environmental contribution at a national, regional and local level in line with objectives set out in the NPPF and London Plan Policy GG1.
- 8.25 Euston Tower is in one of the most connected areas in London; an ideal site to deliver the objectives set out in London Plan Policy GG2, which seeks to promote higher density development, particularly in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling.
- 8.26 In its current form, Euston Tower does not make the best use of land in this strategic location. From a design perspective, it has poor connectivity at ground floor level and the upper floors have been vacant for some time, with little prospect of letting the floorspace due to the various technical and market considerations as set further in the submitted Feasibility Study. Chapter 9 (Principle of Deconstruction) of this Statement provides further details on the feasibility exercises that were



undertaken during the pre-application process to explore the future development options for the Site.

- 8.27 The Site therefore has capacity for growth, which is responsive to its context, in line with London Plan policy D1. There is an exciting opportunity to reimagine the building and the public realm within this central London site. The Proposed Development would provide higher quality floorspace suitable for a range of occupiers, including lab-enabled floorspace alongside high quality, flexible, sustainable office floorspace, which would generate employment opportunities for local people in Camden and across London. In addition, the Proposed Development would include retail and community uses for local people to enjoy and benefit from in line with London Planning Guidance 'Optimising Site Capacity,'
- 8.28 A design led approach has been adopted throughout the process, (in line with London Plan Policy D3), maximising opportunities to improve connectivity with the public realm, create high quality employment floorspace and to create opportunities for integration and innovation at a local level. Accordingly, a building which is flexible, adaptable and sustainable is proposed, which meets the objectives of the CAZ at a regional level through accommodating employment growth and at a local level by delivering inclusive growth in an area identified in Local Plan Policy E1.
- 8.29 The London Plan policies seek to ensure that developments make an overall positive contribution to London, through the intensification of land following a design led approach to site capacity and Camden LP policy G1 seeks to ensure the best use of land. The approach to Euston Tower utilises the opportunity to transform the site and surrounding public realm, providing high quality employment space to attract occupiers and investment in the area, bringing this vacant tower back to life.
- 8.30 A net increase of 22,716 sqm office, lab enabled, retail and community space is proposed, which would serve to optimise this vacant site in this strategic location. The proposals therefore directly respond to the London Plan Policy GG2(c) which seeks to proactively explore the potential to intensify the use of land to support economic growth and opportunity, through higher density development.
- 8.31 The Proposed Development presents an exciting opportunity to optimise this strategic site within the Opportunity Area, CAZ and Euston Growth Area in line with London Plan policies SD1, SD4, GG1, GG2, GG5 together with D3 and D1. The proposals are also consistent with objectives within Camden LP policies E1 and E2.

9 Principle of Deconstruction

9.1 This section outlines the assessment of the principle of deconstruction proposed as part of the development of Euston Tower, against the relevant planning policy.

National Planning Policy

9.2 Chapter 14, Paragraph 152 of the NPPF states that the planning system should support the transition to a low carbon future in a changing climate. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings and support renewable and low carbon energy and associated infrastructure.

Regional Planning Policy

9.3 London Plan Policy D3 (Optimising site capacity through the design-led approach) relates to optimising site capacity through a design-led approach. It states that “All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity.”

9.4 The supporting text to Policy D3 goes on to state at paragraph 3.3.10 that “To minimise the use of new materials, the following circular economy principles (see also Figure 3.2), should be taken into account at the start of the design process and, for referable applications or where a lower local threshold has been established, be set out in a Circular Economy Statement”.

9.5 Paragraph 3.3.11 continues to set out that “Large-scale developments in particular present opportunities for innovative building design that avoids waste, supports high recycling rates and helps London transition to a circular economy, where materials, products and assets are kept at their highest value for as long as possible.”

9.6 Figure 3.2 (also discussed further below) then sets out a hierarchy for building approaches which maximises use of existing materials. And paragraph 3.3.12 identifies that “The best use of the land needs to be taken into consideration when deciding whether to retain existing buildings in a development.”



- 9.7 London Plan Policy SI7 (Reducing waste and supporting the circular economy) relates to reducing waste and supporting the circular economy. It states that resource conservation, waste reduction, increases in material re-use and recycling and reductions in waste going for disposal would be achieved by the Mayor, waste planning authorities and industry working in collaboration to: (inter alia) promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible.
- 9.8 The GLA’s Circular Economy Statement LPG (2022) Chapter 2.4 sets out design approach for existing buildings. This chapter sets out a decision tree, stating this should be followed to inform the design process from the outset. The Circular Economy design approaches for existing structures are as follows (as set out in Table 2 of this document and Figure 3.2 of London Plan Policy D3):
- Retain and retrofit
 - Partial retention and refurbishment
 - Disassemble and reuse; and
 - Demolish and recycle
- 9.9 Paragraph 2.4.2 of the LPG states that “retaining existing building structures totally or partially should be prioritised before considering substantial demolition, as this is typically the lowest carbon option.” This goes on to state that “Proposals that are further down the hierarchy will require more detailed and compelling justification.” It notes that “There may be other planning reasons that necessitate the demolition or retention of existing buildings, such as heritage considerations, which the process set out in Figure 4 [Decision tree for design approaches for existing structures/buildings] cannot and does not override.”

Local Planning Policy

- 9.10 Policy CC1 (Climate change mitigation) of the Local Plan requires all development to minimise the effects of climate change and encourages all development proposals to demonstrate the highest environmental standards feasible that are also financially viable during both construction and occupation. All development proposals that involve substantial demolition are required to demonstrate that it is not possible to retain and improve the existing building (Part E) and optimise resource efficiency (Part F).
- 9.11 CPG: Energy Efficiency and Adaptable (2021) states that LBC will “expect creative and innovative solutions to repurposing existing buildings, and avoiding demolition where feasible,” (Chapter 9).

9.12 Paragraph 9.3 of the CPG states that “Reusing buildings helps developers and the wider community to understand the environmental, social, and heritage value of a site. Benefits of retaining and refurbishing buildings:

- Reduces the requirement for virgin materials and therefore reduces its embodied carbon impact;
- keeps products and materials at their highest value for as long as possible;
- maintains heritage value;
- minimised demolition waste
- reducing human disruption of extensive demolition and construction works, associated noise and transport impacts, and likely impact on air quality
- cost and programme savings, depending on the scope of refurbishment and
- achieve BREEAM credits.”

9.13 Paragraph 9.5 and 9.6 of the CPG states that “taking into account the condition of the existing building and feasibility of re-use above, the following hierarchy should be used to explore all potential options of an existing site, with the aim of optimising resource efficiency.

I. Refit

II. Refurbish

III. Substantial refurbishment and extension

IV. Reclaim and recycle”

9.14 All options should achieve maximum possible reductions for carbon dioxide emissions and include adaptation measures, in accordance with the Council’s Development Plan and this CPG.

Assessment

9.15 A detailed feasibility study began in October 2022 to explore options to deliver the project vision. This resulted in a three-part feasibility study being undertaken by GXN, supported by Arup and Sweco, which has been submitted as part of this planning application (along with a summary ‘Volume 0’). Details were issued to and discussed with officers at LBC and the GLA throughout the process. LBC subsequently instructed an independent review of the feasibility study by Hilson Moran and Elliott Wood. The scope of the feasibility study is set out in detail in the submitted documents and summarised below.

- 9.16 The feasibility study follows the hierarchy set out in the Energy Efficiency and Adaption CPG (para. 9.6). The structure of which is as follows:
- Volume 0: Summary of the Feasibility Study
 - Volume 1: Assessing the Existing Building for Continued Commercial Use
 - Volume 2: Potential Alternative Uses
 - Volume 3: Options for Retention and Extension.
- 9.17 As part of the Feasibility Study Volume 1, surveys and assessments were undertaken to establish the condition of the existing building. This concluded that the façade and services of the existing building need to be removed and replaced to meet current standards and building regulations. The height between the existing storeys (floor to floor height) is very low for a modern commercial building. This is compounded by measures required to bring the building up to current Building Regulations standards and the building services required by modern occupiers. This would in turn have a limiting impact on the desirability of the building and ability to let.
- 9.18 It is noted that the existing concrete structure is generally in reasonable condition. In terms of building structure, however, due to the idiosyncratic nature of the existing layout and construction with satellite cores, ribbed floor slabs and a concrete perimeter beam, the building structure is very difficult to adapt.
- 9.19 The feasibility study concluded that major alterations would be required to retrofit the existing building into one which is compliant with current Building Regulations and attractive to modern occupiers. Ultimately, with the interventions required to bring the building up to current standards, the disconnected floor layouts, and the compromised floor to ceiling height, the resulting spaces would not be suitable for the Central London office market, and would not deliver the type of space, including lab-enabled space, required by Knowledge Quarter occupiers. The cost of the upgrades required, and the quality of the space delivered would make viability very challenging, with risk of significant leasing voids and vacancy.
- 9.20 Through following the CPG hierarchy, the study concludes that the optimum structural solution which enables the constraints set out above to be addressed, while maximising structural retention, is to retain the central spine, basement and foundations of the existing tower, which is equivalent to 31% of the existing structure.



- 9.21 This option was identified to be preferable as it offers the optimum balance of structural retention, quality, flexibility and adaptability. It also enables new floor to ceiling heights which are suitable for a modern office building, as well as the provision of lab enabled space, which is not possible in the existing tower.
- 9.22 In line with the GLA Whole Life Cycle Assessment (2022), initial (feasibility stage) whole life-cycle carbon assessments (WLCAs) have been undertaken for various options ranging from major refurbishment to new build, based on a consistent mix of uses for each option to ensure a genuine basis for comparison. With respect to total tonnage and intensity of carbon emissions, the 'partial retention and extension: retain the core' option presents the lowest whole life-cycle carbon position when compared with the other options identified to provide an acceptable form of development. Alongside the Feasibility Study, GXN have explored a pioneering approach to the Circular Economy to maximise the reuse, recycling and upcycling of material removed from the building during the deconstruction process. This is discussed further in Chapter 14.
- 9.23 The approach to exploring the quantum of retention and deconstruction is in line with Camden LP Policy CC1, which requires all development proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building (Part E). Moreover, the Proposed Development has been subject to a feasibility study which has demonstrably shown the constraints which a higher extent of retention would present, and that such an approach would not deliver a better whole-life carbon solution. On this basis it is also the case that Part (E) of Policy CC1 in the Camden LP has been shown to be satisfied.
- 9.24 The Proposed Development would accord with London Plan policy which seeks to optimise site capacity through a design-led approach and to reduce waste and support circular economy principles. The approach to the design has followed the decision tree set out within Chapter 2.4 of the GLA Circular Economy Guidance, exploring the potential for reimagining Euston Tower using, the retain and retrofit, partial retention and refurbishment, disassemble and reuse, and demolish and recycle hierarchy.
- 9.25 Feasibility Volumes 1-3 considering options for retention and reuse of the existing building have been independently reviewed by a third-party assessor and their review report has been issued to Camden Council.

10 Land Use

- 10.1 This section assesses the Proposed Development in terms of the proposed land uses.

Commercial Office and Lab –Enabled Spaces

National Planning Policy

- 10.2 Paragraph 81 of the NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Regional Planning Policy

- 10.3 Policy SD4 (The Central Activities Zone (CAZ)) of the London Plan states that the unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions and local uses, should be promoted and enhanced. It goes on to state that the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values. Part G of this policy notes that the CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities, and other more local Special Policy Areas should be supported and promoted.
- 10.4 Part A of Policy E1 (Offices) of the London Plan outlines that improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision and mixed-use development.
- 10.5 Policy E8 (Sector growth opportunities and clusters) of the London Plan sets out the wider sector growth opportunities and clusters across London and notes that a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector specific opportunities.
- 10.6 Part D of Policy E8 states that innovation, which includes London's role as a location for research and development, should be supported. The supporting text notes that Development Plans should support the range of existing and proposed medical and life

sciences research districts and that within this sector, there is a particular demand for laboratory space.

Local Planning Policy

10.7 Policy E1 (Economic development) of the Camden Local Plan states that the Council will secure a successful and inclusive economy in LBC by creating the conditions for economic growth, harnessing the benefits for local residents and businesses. To achieve this, the Council has committed to the following:

- a) support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;
- b) maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;
- c) support local enterprise development, employment and training schemes for Camden residents;
- d) encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough
- e) support the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan
- f) direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031;
- g) support Camden's industries by
 - i. safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;
 - ii. supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites;
 - iii. iii. safeguarding the Kentish Town Industry Area;
 - iv. promoting and protecting the jewellery industry in Hatton Garden.

- h) expect the provision of high-speed digital infrastructure in all employment developments; and
- i) recognise the importance of other employment generating uses, including retail, education, health, markets, leisure, and tourism.

10.8 The policy continues to note that the Council will support and promote the development of the KQ, direct office development to the Central London Area and recognise the contribution of other employment uses including retail, education, health, markets, leisure, and tourism.

10.9 The supporting text of this policy confirms that LBC will support the development of science and creative industries and promote the development of the KQ around Euston and King's Cross. The overall vision of the KQ is to create a world-class knowledge hub for innovation, collaboration and knowledge exchange.

10.10 Policy E2 (Employment premises and sites) of the Local Plan sets the policy context for the provision of new employment premises within LBC. More specifically, 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;
- v. for larger employment sites, any redevelopment is part of a comprehensive scheme.

10.11 Paragraph 72 of LBC's CPG: Employment Sites and Premises states that for developments where an increase of 1,000sqm GIA or more is proposed, floorspace for SMEs should also be provided.

10.12 Part E of Policy C2 (Community facilities) of the Local Plan seeks to support the investment plans for educational, health, scientific and research bodies to expand and enhance



operations across LBC. These proposals will be balanced against the impact these may have on residential amenity and local transport infrastructure.

- 10.13 The supporting text of this policy adds that the existing research institutions contribute to the local and national economy by supporting the growing innovation in this sector and the increase in employment numbers these companies contribute towards. It is noted that a significant cluster of these research-based organisations are based within the KQ, around King's Cross, Euston, and Bloomsbury. LBC recognise that it is important to ensure that in order for these institutions to adapt to changing standards and requirements, there is an ongoing need for modern facilities. However, these new spaces must be balanced against local amenity and the overall character of the area.
- 10.14 The Euston Area Plan Strategic Policy EAP 1 states that in the Euston Area, the appropriate mix of uses will include between 180,000 and approximately 280,000 sqm of employment/economic floorspace including replacement floorspace, providing between 7,700 and approximately 14,100 additional jobs as well as around 1,400 replacement jobs. New economic uses should support the local economy and include local people in the opportunities created by development as well as contributing to the wider London and national economy, particularly strengthening the role of the area's cluster of science and education institutions.
- 10.15 Draft Policy KQ1 (Supporting growth in the Knowledge Quarter Innovation District) in Camden's Draft Site Allocations Local Plan (February 2020) relates to the KQ and sets out what major development proposals for additional employment, research and/or learning floorspace must achieve.
- 10.16 Draft Policy KQ1 states "To ensure the sustainable growth and success of the Knowledge Quarter Innovation District, major proposals for additional employment, research and/or learning floorspace within it must:
- a) Demonstrate that they have been developed in a collaborative way with other key stakeholders in the wider innovation district and potentially beyond to meet the needs of the knowledge sector.
 - b) Be supported by evidence that the type of floorspace being provided appropriately reflects current and emerging needs of the knowledge economy and would

complement and support other institutions and companies that contribute directly to the success of the innovation district.

- c) Seek to prioritise the creation of suitable floorspace for priority growth sectors within the district such as life sciences, digital collections and machine learning.
- d) Provide for a suitable mix of workspace types including business accelerators, start-up and move on spaces.
- e) Ensure that buildings are designed to support future reconfiguration for different activities and where possible include flexible floorplates, plant room and mechanical and electrical systems that allow a change from offices to laboratories.
- f) Ensure that at least 20% of additional employment floorspace is affordable workspace.
- g) Ensure development and its occupiers contribute to reducing inequalities and increasing life chances in neighbouring communities and the borough generally through maximising social value at the planning, construction and end user phases, including supporting increased access to jobs, skills training and education opportunities. Social value frameworks should be used to secure commitments to ensure that nobody gets left behind.
- h) Contribute towards the provision of new physical and social infrastructure to support the Knowledge Quarter Innovation District, such as new homes, public realm enhancements and transportation improvements including transforming pedestrian and cyclist movement within, around and across the Euston Road corridor.”

10.17 As set out in Paragraph 10.6 of this Statement, there is a clear identified need in London Plan policy for laboratory space in London, with Camden particularly placing emphasis on the intensification of this industry across the Borough. The Government’s 2018 Science and Innovation Audit and the recently launched Knowledge Clusters report by the London Property Alliance (2023) and British Land and Savills report (2023) also highlights the shortage of space.

Assessment

10.18 The proposed use of the Site for commercial uses, including the provision of lab-enabled floorspace, is supported at all levels of planning policy. The proposal seeks to intensify the quantum of floorspace on site. The Proposed Development seeks to provide 74,791sqm of employment floorspace, an uplift of 21,020sqm of commercial floorspace. Please refer to

- Tables 1 and 2 within the Chapter 5: Development Proposals of this Statement for a full breakdown of the proposed land uses.
- 10.19 British Land is looking to reposition Regent's Place as a hub for life science and innovation uses in the Knowledge Quarter. The delivery of modern office and lab enabled floorspace at Euston Tower forms a significant part of this vision.
- 10.20 The site presents an excellent opportunity to enhance, promote and grow the Knowledge Quarter in line with the requirements set out in Draft Policy KQ1.
- 10.21 Delivering the proposals would support and contribute to the growth and success of the KQ as a world-class cluster of science and knowledge-based institutions, in line with supporting text of Camden LP Policy E1 (Paragraph 5.23) which states that LBC will support the development of these industries and promote the development of the Knowledge Quarter around Euston and King's Cross and Part C of Draft Policy KQ1 and Easton Area Plan Policy EAP1 Part 'C'.
- 10.22 The Employment and Skills Strategy and Regeneration Statement, prepared by Volterra, states that demand for laboratory space in London and Camden specifically is high, due to its the concentration of academic and research institutions and teaching hospitals in this area. Vacancy rates are currently sitting at less than 1%, which demonstrates the strong demand within the sector. The 24,496 sqm of lab space proposed is equivalent to 10% of the active requirement for lab demand in the Golden Triangle, (London, Oxford and Cambridge) in line with Part 'B' of the Draft Policy KQ1.
- 10.23 The lab-enabled space on Levels 4-11 has been designed to accommodate a range of business sizes, with the Accelerator Space on Level 3 providing space for start-ups and scale ups to grow within the KQ. This is in line with Part D of Policy E1 and Draft Policy KQ1.
- 10.24 The lab-enabled floorspace has been designed to meet the specific needs and demands of life science occupiers, in accordance with Parts 'A' and 'B' of Draft Policy KQ1. The proposals provide floor-to-floor heights required to support laboratories (at 4.08m in comparison to the office floor to floor heights of 3.8m) including space for additional servicing and structure to minimise vibration and support additional loading. The floorplates can be sub-divided and



- have been designed to allow for future reconfiguration if required, in line with Part 'E' of Draft Policy KQ1.
- 10.25 Levels 03-11 could be adapted to accommodate office uses if required in the future, albeit with more generous floor-to-ceiling heights. The Proposed Development would also provide a Neighbourhood Innovation Lab at the lower levels, which would be accessible to the public and encourage interaction and innovation, inspiring, connecting and creating opportunities for the local community in science, technology and innovation. This is in line with Draft Policy KQ1 Part 'G'. The Proposed Development would also contribute towards providing new affordable homes, and public realm enhancements which deliver an enhanced pedestrian experience in line with Part 'H' of Draft KQ1 policy.
- 10.26 The site is located within the CAZ, and the proposals would enhance the office function of this strategic location in line with London Plan Policy SD4.
- 10.27 Part F of Policy E1 of Camden's Local Plan outlines that between 2014 and 2031 the forecast demand for office space in Camden sits at 695,000 sqm, equivalent to 41,000 sqm per year. The Employment and Skills Strategy and Regeneration Statement (prepared by Volterra) sets out that the latest available monitoring data shows that between 2014/15 and 2019/20, 229,939 sqm of B1a (office) space was approved, equivalent to 38,323 sqm per year. This demonstrates that there is shortfall in the pipeline and is under-delivering against LBC's targets for office floorspace, which is likely to be larger in practice as not all planning approvals are built out. The scheme would contribute significantly to meeting the office floorspace targets set out by LBC, contributing more than the annual requirement for office space and 7% of space over the entire plan period (2014-2031). Further details of this are set out within the submitted Employment and Skills Strategy and Regeneration Statement, prepared by Volterra.
- 10.28 Whilst office vacancy rates across London are increasing, tenants are prioritising high quality buildings and locations. This is evident in King's Cross / Euston Vacancy rates (5.6 %), being below the London average (9.9%) and the GLA recommendation for market choice (8.0%) (see Volterra report for further details).
- 10.29 The proposed office floorspace has been designed to be flexible and adaptable in line with London Plan Policy E1. This is to ensure the building can be adapted to meet the demands of future tenants, through the ability to remove part of the floorplate to allow for double height

spaces and enhanced connectivity between floors should the tenant require. This means the Proposed Development can adapt to changing requirements in the future and avoid the issues with lack of flexibility and adaptability in the existing tower.

- 10.30 There continues to be strong demand for well-located, high quality, flexible, sustainable commercial space. The Proposed Development has been designed with this in mind, to enable occupiers to respond and adapt to changing ways of working and continue to attract talent.

Affordable Workspace

- 10.31 Part F of Policy E2 of Camden's Local Plan states that LBC will consider a higher intensity redevelopment of sites that are considered suitable for continued business provided that (amongst other conditions) the proposed premises include floorspace suitable for start-ups and small and medium-sized enterprises, such as managed affordable workspace where viable.

- 10.32 CPG: Employment sites and business premises (January 2021) confirms that LBC will seek to provide affordable workspace for small and medium sized enterprises ('SME') from large scale employment developments with a floorspace of 1,000sqm (GIA) or more. Examples of how affordability is provided may include 20% of the workspace to be provided at 50% of comparable market values or an element of the floorspace to be offered to an affordable workspace provided at a reduced rent.

- 10.33 Where affordable workspace is provided as part of a scheme, LBC require a statement to be submitted alongside the planning application which provides further details of the provision and implementation of the affordable workspace, as well as possible management of these spaces which would then inform the relevant Section 106 obligation.

- 10.34 Part F of Draft Policy KQ1 seeks to "ensure that at least 20% of additional employment floorspace is affordable workspace."

Assessment

- 10.35 British Land proposes to provide 2,670sqm of lab-enabled Accelerator Space on the third floor of Euston Tower. For early-stage science businesses, 'speed to market' is a fundamental requirement. This means that once a business has secured funding to start or expand its research and development, it is essential that it can become operational as quickly as possible.



One of the greatest challenges for early-stage businesses is finding, securing, and then fitting out premises that would enable them to focus on their core business and property needs can be a significant distraction taking time and resource away from research and development.

- 10.36 It is envisaged that the third floor of the proposed building would be flexibly divided into individual laboratory and write-up spaces sized to the needs of start-up and scale-up life science businesses, typically 150-450 sqm, dependent on occupier requirements and configuration of the space. It is proposed that this space would be fitted out to Cat B level, including floors, ceilings, heating / cooling systems, partitioning, benches, and specialist shared equipment which could include fume cupboards, ultra-low temp freezers, purified water and auto-claves. It is the intention that the space also benefits from shared services common to the building, such as gas bottle delivery and contaminated waste collection.
- 10.37 The upfront investment required in these facilities is significant and it is intended that the provision of fitted space would make it affordable to start-ups and scale-ups in the life sciences sector. The space would be made available on highly flexible terms.
- 10.38 In addition to this, the podium levels would include spaces for flexible working, with free Wi-Fi and charging.
- 10.39 Ultimately, the Proposed Development seeks to increase the quantum of high quality employment floorspace on the site which meets the clear demand for lab enabled space and modern, flexible, sustainable office floorspace in the KQ, which is strongly supported within national, regional and local planning policies.

Neighbourhood Innovation Lab

Regional Planning Policy

- 10.40 Chapter 92 of the NPPF states that policy and decisions should aim to achieve, inclusive and safe places which promote social interaction through mixed-use developments.
- 10.41 The London Plan underscores the importance of 'good growth' as the foundation for all its policies. Specifically, in line with London Plan Policy GG1 of building strong and inclusive communities, major developments are required to provide access to high-quality community

spaces, services, amenities, and infrastructure that will strengthen communities by promoting social integration amongst the community.

Local Planning Policy

- 10.42 Policy C2 (Community facilities) of Camden’s Local Plan states that LBC will work with partners to ensure that community facilities and services are developed and modernised to ensure they meet the changing needs of the borough’s communities and reflect new approaches to the delivery of services. As part of this policy requirement, planning obligations to secure new and improved community facilities and services are required to mitigate any impact of the development.
- 10.43 CPG: Community Uses (January 2021) ensures that development makes appropriate contributions to community facilities based on the needs generated.

Assessment

- 10.44 One of the key visions for the Proposed Development, is “putting social impact at the heart of the project from the start and ensuring that communities play a key role in shaping new spaces which meet local needs.” This concept has been developed through extensive community and stakeholder engagement and co-design process to understand the needs and aspirations of the local community and ensure that Euston Tower responds to them.
- 10.45 The Proposed Development has been influenced by existing research and engagement, including the Euston Social Value Charter, We Make Camden (2025) and British Land’s Social Impact Strategy for Regent’s Place.
- 10.46 British Land has used these frameworks and local engagement to guide the approach to public use and ensure that proposals respond effectively, to ensure that this space would ultimately be well used by the local community.
- 10.47 Accordingly, the Proposed Development comprises three floors of publicly accessible space, in the form of a proposed Neighbourhood Innovation Lab (just over 2,000 sqm in total). The primary entrance to the public space is from Hampstead Road to the east with a secondary entrance from Brock Street to the north. There is also an accessible entrance to the café and public spaces at first floor level via the external staircase and ramp, accessed from Regent’s

Place Plaza to the west. The Neighbourhood Innovation Lab combines informal meeting and workspaces with meeting rooms, events and exhibition space and potential for specialist uses such as media studios.

- 10.48 The spaces have been designed to be flexible and adapt to the needs of the community. The NIL offering would be established in partnership with an operator and informed by the ongoing dialogue with the local community. Further details of each podium floor are set out below:

Ground Floor: Interact

- 10.49 The ground floor fronts onto Hampstead Road with significant street frontage and a generous entrance. The designs have been formed around an invitation to interact, reflecting interest expressed through the co-design process in creating more opportunities to engage and come inside the building. In response, the space has been designed to be a welcoming and active space, rich with opportunities.
- 10.50 On a day-to-day basis, the ground floor could be used to develop, test, or showcase local projects and initiatives, providing space for activities and events and connecting people to what happens in the building or area in terms of skills or mentoring.

First Floor: Exchange

- 10.51 The first floor directly connects with the new civic square, opening onto Regent's Place Plaza. Its invitation to 'exchange' is supported by social, meeting and collaboration spaces, including a destination café, open and informal meeting spaces and semi-private rooms, with potential for pop up presentations and installations to encourage visitors to learn about ongoing projects and encourage participation.

Second Floor: Innovate

- 10.52 The second floor envisages working spaces to develop projects important to the local community. This floor would provide a variety of different sized rooms for working, workshops and training as well as shared facilities such as an innovation library, or media suites which could be used by local groups. These work focused spaces would support projects of different sizes and durations. People at different levels of interest and stages of their career



– from youth to late career professionals – would benefit from sharing an environment focused on supporting their journey in science, technology, and innovation.

10.53 The Public Use Framework document prepared by Forth, submitted as part of this application, explains in further detail how the concept of the Neighbourhood Innovation Lab is being developed and how this can be realised and sustained in the long term. It is anticipated the NIL and the need to confirm its offering via a public use strategy would be secured via a planning obligation. The proposals therefore comply with London Plan Policy GG1 and Local Plan Policy C2.

Mixed Use

National Planning Policy

10.54 One of the core principles of the NPPF is to promote mixed use developments and encourage multiple benefits from the use of land. Chapter 5 of the NPPF provides a framework for delivering a sufficient supply of homes by setting out how Local Authorities should assess and plan for housing need to be met through sufficient land being available to meet housing need. The Government's strategic objective as set out in the NPPF is to deliver a wide choice of high-quality homes and create sustainable, inclusive and mixed communities.

10.55 Chapter 5 of the NPPF supports the Government's objective of significantly boosting the supply of homes. Local planning authorities should plan for a mix of housing based on current and future demographic trends. They should also identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

Regional Planning Policy

10.56 Policy SD6 (Town centres and high streets) of the London Plan seeks to continue to support the unique functions the CAZ fulfils for London, the UK and internationally, and the development needed to sustain it. The policy identifies a strategic priority to promote and coordinate development to provide a competitive, integrated and varied global business location.

10.57 The GLA's Central Activities Zone SPG states that the supply of sufficient office floorspace, in terms of type, size and cost within the CAZ (and in functionally related parts of the north of the Isle of Dogs and Tech City) to meet growing demand are central to London's economic

success. It is essential that the office and business space offer in these areas is not eroded. However, within these areas, differentials in office and residential values have led to concern over the loss of office space to housing even though they are currently exempt from PDR (Paragraph 1.3.1).

- 10.58 The SPG continues to note that there is concern that sustained loss of offices, including the generally more affordable existing office stock, could erode the strategic offer of the CAZ as an internationally competitive and nationally important office location and undermine its associated agglomeration benefits.

Local Planning Policy

- 10.59 Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes) of the Camden Local Plan 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 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.
- 10.60 Policy H2 sets out several factors that the Council will consider in determining whether self-contained housing is required as part of a mix of uses namely:
- a) the character of the development, the site and the area;
 - b) site size, and any constraints on developing the site for a mix of uses;
 - c) the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
 - d) whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;
 - e) whether the development is publicly funded or serves a public purpose;

In addition to the above, the Council will also take into account the below when considering whether housing should be provided on site and the most appropriate mix of housing and other uses:

- f) the need to add to community safety by providing an active street frontage and natural surveillance;
 - g) the extent of any additional floorspace needed for an existing user;
 - h) the impact of a mix of uses on the efficiency and overall quantum of development;
 - 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;
 - j) whether an alternative approach could better meet the objectives of this policy and the Local Plan.
- 10.61 Where housing is required as part of a mix of uses, LBC requires self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed.
- 10.62 Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, it will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.
- 10.63 Draft Policy KQ1 outlines that to ensure the sustainable growth and success of the KQID, major proposals for additional employment, research and/or learning floorspace within it must contribute to the provision of new physical and social infrastructure to support the KQID, such as new homes.

Assessment

- 10.64 During the pre-application stage, it was discussed and agreed with LBC officers that this building should remain a wholly commercial building having regard to its nature and location on a prominent site on Euston Road in the heart of the CAZ and the Knowledge Quarter Innovation District.
- 10.65 The Policy H2 assessment is based on the quantum of proposed uplift of commercial floorspace (22,716 sqm). In assessing the Proposed Development against Policy H2, it is identified that housing is not appropriate and therefore not required to be delivered on site in this instance in accordance with criteria a, b,d,h and j of Policy H2 as follows:

a. the character of the development, the site and the area;

- 10.66 The existing tower is a wholly commercial building, and its use is supported and protected in policy. The proposal is for a commercial building, with laboratory enabled space, workspace and flexible spaces suitable to support the KQ as a world class cluster of science and knowledge-based institutions. It is widely acknowledged that there is a much-needed requirement for laboratory enabled floorspace in this location.
- 10.67 Moreover, the site is located in a predominantly commercial area on the busy Euston Road. Opposite the site lies a large hospital with an active A+E department. The road and the hospital generate noise 24 hours a day. Furthermore, the air quality along Euston Road is extremely poor and the busy thoroughfare has one of the highest particulates (pollution) counts in the capital.
- 10.68 The site suffers from a windy microclimate, which whilst improved by the Proposed Development, would make the provision of usable balconies for residential uses challenging.
- 10.69 Policy A4 (Noise and vibration) of Camden's Local Plan advises that the Council seek to ensure that noise and vibration is controlled and managed. Part (b) of the policy states that: "We will not grant planning permission for: ... development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses."
- 10.70 CPG: Amenity (2021) further advises that noise and vibration can have a significant impact on amenity, quality of life and well-being.
- 10.71 While things could change in the future, Euston Road would still remain as a main arterial road and UCLH is likely to remain in situ. Therefore, there will always be noise and air quality implications at this busy location.
- 10.72 Taking into account the character of the Site and the area in which it is located, it is identified that the site is not appropriate to provide self-contained residential units as a part of the mix of uses.

b. site size, and any constraints on developing the site for a mix of uses;

10.73 An analysis of the site was carried out and it was determined that a mixed-use tower comprising residential and commercial uses would be incompatible in terms of the additional core requirements, additional lifts and firefighting lifts which would be required and which would significantly reduce the amount of available floorspace within the building envelope (discussed further in relation to (h) below).

10.74 Furthermore, the Proposed Development has been through a detailed design process with Camden design officers and it has been evidenced that introducing residential uses would have disproportionate impacts on the amount of useable floorspace that can be delivered in the building, which would be a considerable constraint on the development of the site and the optimisation of its use,

d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;

10.75 The site's location on Euston Road is not compatible with residential use for the reasons set out above.

h. the impact of a mix of uses on the efficiency and overall quantum of development;

10.76 The introduction of residential homes on-site would require the introduction of further, separate cores and entrances resulting in an inefficient floorplate, and therefore less usable floorspace delivered overall. Different cores for the different land uses would not be an effective use of land and would not efficiently optimise the potential of the site. Each use and tenure would also require its own ground floor entrance and circulation space, further reducing the quality and permeability of the ground floor. It would therefore have a significantly detrimental impact on the efficiency of the building and the overall quantum of usable floorspace.

j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

10.77 A commercial (lab-enabled and office) scheme meets the policy objectives of the Knowledge Quarter and Central Activities Zone. A commercial development on the site is supported at all levels of planning policy. Moreover, the delivery of housing off site would be expected to



- deliver better quality housing which better meets the needs of Camden residents, whilst continuing to ensure an appropriate mix of uses within the building.
- 10.78 The above assessment demonstrates that providing housing on site within the Proposed Development is not appropriate in this instance. This has been agreed through pre application meetings with officers at LB Camden.
- 10.79 Following agreement of the above, and in accordance with Camden LP policy H2, the Applicant subsequently sought to identify a suitable off-site housing location. Following discussions with LB Camden, 7-9 William Road was initially identified as an option to deliver off site housing.
- 10.80 7-9 William Road is an existing office building located to the north of the Site and is owned by British Land. It was established that the site had the capacity to be converted into 9 residential units. However, whilst a residential scheme on the William Road site was feasible, the site is on Camden's Local List (which identifies historic buildings valued by the local community) and its conversion to residential use is further constrained by structural, fire safety and daylight and sunlight considerations.
- 10.81 Any conversion of the existing building would also be less efficient from a housing delivery perspective by comparison to purpose built housing, and it would also cost more to deliver the units by comparison to a purpose built housing scheme. The outcome of which would be the delivery of less affordable housing than could otherwise be achieved through an alternative approach.
- 10.82 Following further discussions with the Council, it has been concluded there is potential to deliver more affordable housing within the borough elsewhere, through a Payment in Lieu to be directed towards the delivery of affordable housing by the Council on a Council owned site, to be secured via Section 106 legal agreement. Discussions with the Council regarding the Payment in Lieu will continue post submission of this application.

11 Design

- 11.1 This section assesses the proposals against relevant national, regional and local planning policy in terms of design.

National Planning Policy

- 11.2 Chapter 12 of the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
- 11.3 Paragraph 126 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 11.4 Paragraph 130 of the NPPF states that development should function well and add to the overall quality of the area over the lifetime of the development. In pursuance of this, development should be visually attractive, sympathetic to the local character and context, maintain a strong sense of place and distinctiveness.
- 11.5 While achieving this, development should optimise the potential use of the Site including delivering an appropriate mix of green and public space. The application of policy should not discourage appropriate innovation or change. Design quality should be considered throughout the evolution and assessment of individual proposals.
- 11.6 Paragraph 185 identifies that securing high quality and inclusive design goes beyond just the aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.
- 11.7 Paragraph 4 of the PPG: Design (2019), states that local planning authorities are required to take design into consideration and should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area. It states that planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a

designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).

Regional Planning Policy

- 11.8 Policy D3 (Optimising site capacity through the design-led approach) of the London Plan sets out how site capacity should be optimised through a design-led approach. The factors considered within development proposals are form and layout, experience and quality and character. These principles are in place to ensure that the development's form is the most appropriate for the site and land uses meet identified needs.
- 11.9 Policy D4 (Delivering good design) of the London Plan states that the design of development proposals should be thoroughly scrutinised in regard to its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping to further ensure good design is delivered. The level of scrutiny development proposals are subject to will be appropriate to the scale and/or impact of the project. This scrutiny includes detailed and regular communication with planning case officers and making use of the design review process to assess and inform design options early in the planning process.
- 11.10 Policy D5 (Inclusive design) of the London Plan requires development proposals to achieve the highest standards of accessible and inclusive design which should consider London's diverse population, provide high-quality people focused spaces that are designed to facilitate social interaction and inclusion, be convenient and welcoming with no disabling barriers, and spaces should also be designed to be entered, used, and exited safely, easily and with dignity for all. An inclusive design approach helps to ensure this is all achieved.
- 11.11 Policy D9 (Tall buildings) of the London Plan requires the boroughs to provide a definition of what is a 'tall building' for areas that have been identified as appropriate for tall buildings and within future Development Plans identify these locations. The policy sets out the visual, functional, and environmental criteria which tall buildings should be address, set out below:

1) visual impacts

- a) the views of buildings from different distances:

i. Long range

ii mid-range

iii immediate views from surrounding streets

b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.

c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.

d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.

e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it.

f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river. g) buildings should not cause adverse reflected glare.

h) buildings should be designed to minimise light pollution from internal and external lighting.

2) functional impact

a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.

b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm.

Servicing, maintenance and building management arrangements should be considered at the start of the design process.

c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas.

d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building.

e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area and maximises the role of the development as a catalyst for further change in the area.

f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.

3) environmental impact

a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.

b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions.

c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.

4) cumulative impacts

a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals

and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.

Public access

Part D further provides that “Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.”

Local Planning Policy

11.12 Policy D1 (Design) of Camden’s 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 states the characteristics LBC will expect to achieve this policy objective, these include:

- a) respects local context and character;
- b) preserves or enhances the historic environment and heritage assets in accordance with Policy D2 (Heritage);
- c) is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d) is of sustainable and durable construction and adaptable to different activities and land uses;
- e) comprises details and materials that are of high quality and complement the local character;
- f) integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g) is inclusive and accessible for all;
- h) promotes health;
- i) is secure and designed to minimise crime and antisocial behaviour;
- j) responds to natural features and preserves gardens and other open space;
- k) incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l) incorporates outdoor amenity space;
- m) preserves strategic and local views;

- n) for housing, provides a high standard of accommodation; and
 - o) carefully integrates building services equipment.
- 11.13 Policy D1 also sets out LBC’s position on tall buildings. For the purposes of this policy, Paragraph 7.35 states that “tall buildings are considered to be those which are substantially taller than their neighbours or which significantly change the skyline.” Paragraph 7.36 goes on to state that LBC have not defined areas where tall buildings will be appropriate given the diverse and mixed range of building heights in the borough.
- 11.14 CPG: Design (January 2021) establishes key design principles which are to be incorporated and 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.
- 11.15 The overarching principles that LBC are committed to in order to achieve design excellence are:
- The context of a development and its surrounding area;
 - The design of the building itself;
 - The use and function of buildings;
 - Using good quality sustainable materials;
 - Creating well connected public spaces and good quality public realm;
 - Opportunities for promoting health and well-being; and
 - Opportunities for improving the character and quality of an area.
- 11.16 It is noted that high quality design contributes significantly to the success of a development, of a place and the community in which it is located, and ensures a high-quality, sustainable environment for all in the community to live, work, play and relax.

Assessment

- 11.17 The existing building is one of the tallest in Camden along with the BT Tower and Centre Point. The existing building is 36 storeys and approximately 153m AOD.
- 11.18 The Proposed Development has taken a design led approach which optimises this strategic location. The form, layout, and quality of the proposals, both within the building and outside

- within the public realm has been carefully considered in relation to the immediate and surrounding context, ensuring the development is appropriate and complements the area in line with London Plan Policy D3.
- 11.19 The design has evolved through the public and stakeholder consultation process, which is explained in further detail within the DAS. It has been presented at two Design Review Panels, with comments being taken on board and integrated within the overall objectives for the site where possible. The evolution of the design and process undertaken therefore accords with Policy D4 of the London Plan.
- 11.20 The massing concept for the Proposed Development has been largely inspired by the pinwheel design of the existing building. The proposed tower comprises four quadrants which are angled, to create a split across each façade to break up the massing. This challenges the conventional tower typology by creating the appearance of four separate towers, which are interlinked internally via a continuous floorplate.
- 11.21 Breaks in the facades have been introduced to further articulate the massing, including breathing spines and amenity spaces which correspond to neighbouring context.
- 11.22 The podium massing has evolved through the design and pre-application process, with the overall objective to create a connection between the tower and the public realm, responding to a failure of the existing tower.
- 11.23 The massing of the podium is multi-functional. It provides relief for users of the public realm from the elements, and to mitigate against the wind around the base of the tower. Both of these points were raised consistently throughout the public consultation process.
- 11.24 The proposed building seeks to retain the height of the existing tower, at 153m AOD, however the number of storeys is reduced to 32 (with 30 useable floors with the top two floors forming plant rooms and a parapet for the BMU to sit behind). This reduction in the number of floors is due to the increased floor to floor heights within the Proposed Development in comparison to the existing.

11.25 The Proposed Development for a replacement tall building of the same height as the existing building on this site has been assessed against the criteria in London Plan Policy D9 as follows:

1. Visual Impacts

11.26 **a) the views of buildings from different distances: Long range, mid-range and immediate views from surrounding streets.**

11.27 The visual impacts of the Proposed Development have been rigorously assessed as part of the Townscape, Visual, and Built Heritage Assessment (“TVBHA”) submitted as part of the application, including a comprehensive assessment of long, mid range and local views. Once complete the building has been assessed to be a beneficial addition to the townscape, by comparison to the existing building on the site. Further detail is set out in Chapter 12 of this Statement: Townscape and Heritage.

11.28 **b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.**

11.29 Euston Tower is an existing, tall building, which aids legibility and wayfinding in the Euston area and the Proposed Development would continue to do so.

11.30 **c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.**

11.31 The Proposed Development has been carefully designed by 3XN to an exemplary standard, using high quality materials which ensure that the appearance and architectural integrity of the building would be maintained throughout its life.

11.32 **d) proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.**

- 11.33 The Proposed Development has been designed to positively contribute to the character of the area. A detailed assessment of the heritage impacts of the Proposed Development has been undertaken as part of the TVBHA. It has concluded that the 'harm' which would be caused is in all instances judged to be at the same scale as that which is caused by the existing Euston Tower, which is 'less than substantial', generally at the lower end of the scale but in some instances at the middle of that scale. Any 'harm', noting the net position, is no worse than existing and offset by the significant public benefits that would be delivered by the scheme. This is set out in further detail in Chapter 12 of this Statement: Townscape and Heritage.
- 11.34 **e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it**
- 11.35 Not applicable.
- 11.36 **f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.**
- 11.37 Not applicable.
- 11.38 **g) buildings should not cause adverse reflected glare**
- 11.39 The Proposed Development has been designed to maximise the appearance of solidity and reduce the quantum of glazing on the facades. The proposed material of the cladding reinforces the sense of solidity. The façade comprises a 1m opaque panel and 2m of glazing. The depth of the facade and the horizontal shelf work to passively shade the glazing, reducing heat gain and improving energy efficiency. The Proposed Development has also been subject to a solar glare assessment, detailed in Chapter 10 of the ES (Daylight, Sunlight, Overshadowing and Solar Glare), and it has been identified that it would not give rise to any significant adverse solar glare effects.

11.40 **h) buildings should be designed to minimise light pollution from internal and external lighting**

11.41 Internal lighting is to be sustainable and sensitive and external lighting kept to a minimum to assist with wayfinding and safety whilst protecting the amenity of neighbouring residents. The lighting would encourage evening use of the amenity spaces on the lower levels and reinforce the identity of the Regent's Place Plaza. The lighting design would also ensure that the external spaces sit comfortably within its local context and character.

2. Functional Impacts

11.42 **a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants**

11.43 The safety of all occupants of the building has been a priority throughout the design process. Further details are set out within the Fire Strategy, prepared by Arup.

11.44 **b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process.**

11.45 All servicing (save for gas deliveries in connection with the Lab uses) would take place via the existing basement (accessed from Longford Street) to minimise disturbance to neighbours. Gas deliveries would be infrequent and throughout the week outside of peak hours. Once operational, the tenants in the building would agree to a management strategy as part of their lease agreements. Furthermore, a façade maintenance strategy has been set out within the Design and Access Statement which shall ensure the quality of the façade is maintained.

11.46 **c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas**

11.47 There are five main entrances (four at ground floor, one at first floor):

11.48 Two lobby entrances to the south at Euston Road. The primary entrance to the public (Neighbourhood Innovation Lab) spaces is from Hampstead Road to the east with a secondary entrance from Brock Street to the north, both at ground floor level. There is also an accessible entrance to the café and public spaces at first floor level via the external staircase and ramp, accessed from Regent's Place Plaza to the west. The number of entrances proposed would ensure even dispersal of people and enhanced permeability.

11.49 **d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building.**

11.50 The Site is located in an area with excellent transport accessibility, with a PTAL rating of 6(b). The Site is mainly served by Warren Street Underground Station (south), Euston Square Underground Station (east) and Great Portland Street Underground Station (west), with Euston Station and King's Cross and St. Pancras also being located to the east of the Site. There are also several bus routes that serve the site along Euston Road (south) and Hampstead Road (east). There are a range of services and facilities to accommodate those working in and visiting Euston Tower.

e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area and maximises the role of the development as a catalyst for further change in the area.

11.51 The Proposed Development would anchor the western end of the Knowledge Quarter, through providing high quality office and life science space, providing in the range of 3,605-4,375 jobs at the Proposed Development (equivalent to 8-10% of LBC's projected employment growth over the next decade) once operational.

11.52 The unique offering of the NIL, together with the employment generated from the Proposed Development would result in a significant increase in activity in the area. Increased footfall would increase revenue in the retail and F&B sectors which would further attract and become a catalyst for investment and regeneration. As set out the Volterra Report, the workers at the proposed development would uplift the economic output (GVA) of the site by

£386m-£462m per year. The NIL seeks to deliver an innovative and bold community use which leverages the scientific and innovative speciality of the building. The enhancement to the public realm, flexible design of the podium and series of entrances into the NIL space would encourage permeability and create a sense of place and support community cohesion which can have important and positive impacts on health and wellbeing.

11.53 **f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings**

11.54 Interference to the reception of digital terrestrial and satellite television services is not expected. A full assessment of the potential signal impacts is set out within the submitted Telecommunications Report, prepared by GTech Surveys Ltd. No detrimental impact on solar energy generation on adjoining buildings is expected.

3. Environmental Impacts

11.55 **a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building**

11.56 The Proposed Development includes a variety of wind mitigation measures. These include the podium design which proposes in-built grilles which disperse wind. The landscaped 'mounds' together with the variety of planting measures and strategically placed totems, further disperse wind at a ground floor level. As a consequence, the Proposed Development improves the wind microclimate position at ground floor level in comparison to the existing.

11.57 For overshadowing, all amenity spaces show compliance with the BRE guidelines on 21st March, with at least half of their area continuing to receive at least two hours of sunlight.

11.58 The daylight sunlight impacts of the Proposed Development have been robustly assessed throughout the design process in accordance with BRE Guidance and further details are set out within the Daylight, Sunlight and Overshadowing Report, prepared by Point 2 and Chapter 18 of this Statement.



11.59 **b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions**

11.60 The sizing and positioning of ventilation equipment, extracts and intakes has been carefully designed to consider the impacts on street level conditions and further information is set out within the submitted Ventilation Strategy, prepared by Arup.

11.61 **c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building**

11.62 The proposal includes plant equipment associated with laboratory and office uses and it is considered that proposed plant would meet Camden's acoustic thresholds. Planning conditions would be imposed to ensure relevant noise thresholds are not exceeded by the plant to be installed as part of the Proposed Development. Plant noise and traffic noise associated with the operation of the building have been subject to assessment and this has concluded that there would be negligible noise effects.

4. Cumulative Impacts

11.63 **a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.**

11.64 A cumulative assessment of developments has been undertaken as part of the TVBHA . There are no proposed, consented or planned tall buildings in the area around Euston Tower to be considered at this stage.

Part D Public access

- 11.65 **Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.**
- 11.66 There would be just over 2,000sqm of dedicated public space within the podium of the Proposed Development. The proposed Neighbourhood Innovation Lab would provide spaces for events and exhibitions, spaces to meet and collaborate, encouraging the local community into the life science sector. The primary entrance to the public spaces is from Hampstead Road to the east with a secondary entrance from Brock Street to the north, both at ground floor level. There is also an accessible entrance to the café and public spaces at first floor level via the external staircase and ramp, accessed from Regent's Place Plaza to the west.
- 11.67 The above clearly demonstrates that the Proposed Development is in accordance with London Plan Policy D9 (Tall Buildings).
- 11.68 Camden's policy on tall buildings (Policy D1) states that tall buildings are considered to be those which are substantially taller than their neighbours or which significantly change the skyline. The existing Euston Tower is substantially taller than its neighbours. However, it is located within the CAZ and Euston Opportunity Area, where development is to be directed. Furthermore, this is an ideal site to deliver the objectives set out in London Plan Policy GG2, which seeks to promote higher density development, particularly in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling.
- 11.69 The Proposed Development has been designed in accordance with the objectives set out within Policy D1 of the Local Plan. These are set out and explained further below.
- 11.70 The Proposed Development responds to the local context and character through exploring 'what makes a Camden building' early on in the pre application process. Careful consideration has been given to the materiality, colour, façade design and ground floor integration to ensure that the tower responds well to the unique local character. This is in accordance with Part 'A' of Policy D1.

- 11.71 Part 'B' requires buildings to preserve or enhance the historic environment. The site is not within a Conservation Area, however the views from surrounding Conservation Areas have been rigorously tested and reviewed with input from Historic England. It is considered that the Proposed Development accords with Part 'B' of Policy D1. Further assessment is set out within Chapter 12 of this Statement.
- 11.72 Creating a sustainable, adaptable building has been at the heart of the objectives from the start of the design process in line with Part 'C' and 'D' of Policy D1. The Proposed Development is to be net zero carbon in construction and operation, with sustainable initiatives throughout the proposal including façade design to increase shading and reduce operational energy use and urban greening. This also meets the aspirations set out in Paragraph 4 of the PPG: Design (2019). Further details can be found within Chapter 14 of this Statement.
- 11.73 The materials respond to the local character, which comprises largely solid and robust masonry buildings. The proposal for using Glass Reinforced Concrete responds to this in both colour and texture to respond to Part 'E' of Policy D1.
- 11.74 Integrating the podium into the public realm at both ground and first floor level has been a key focus of the design from an early stage, responding to challenges the existing building faces and comments throughout the consultation process. Through assessing the movement of people through the existing site, clear wayfinding and accessible routes are proposed, to enable the public to utilise the space freely in line with parts 'F' and 'G' of Policy D1.
- 11.75 Furthermore, the development seeks to promote good health through accessible and educational public realm, together with promoting sustainable travel measures in line with London Plan policy D5 which seeks to promote good health.
- 11.76 The public realm proposals, designed by DSDHA, incorporate features from Hampstead Heath to the north of the Borough, maximising opportunities for greening, various forms of landscape, habitats and biodiversity, and overall providing an uplift in publicly open space in line with Parts 'I', 'J' and 'K' of Policy D1.



- 11.77 Part 'M' of Camden LP Policy D1 seeks to ensure developments preserve and enhance strategic and local views, which are summarised in Chapter 12 of this Statement. Part 'N' is not relevant as it relates to housing and Part 'O' seeks new buildings to carefully integrate building services equipment into the design, which is demonstrated through the integrated ventilation and services systems throughout the proposals.
- 11.78 In summary, the Proposed Development is fully compliant with London Plan Policy D9, Camden LP Policy D1, together with other relevant design policies at a national, regional and local level. Further details are set out within the Design and Access Statement, prepared by 3XN.

12 Townscape and Heritage

- 12.1 This section considers the development proposals against relevant national, regional, and local heritage planning policy and guidance relating to designated heritage assets, archaeology and townscape. This section considers the Proposed Development in respect of the character and quality of the surrounding townscape, key townscape views, notably LVMF 2A.2 & 2B.1 (Parliament Hill) and LVMF 4A.2 (Primrose Hill), and LVMF 19A.1 (Lambeth Bridge) and designated heritage assets on or around the Site.
- 12.2 A full analysis of the effects of the Proposed Development on designated heritage assets is included within the submitted Views Analysis and the TVBHA (Volume 2 of the ES) prepared by Tavernor Consultancy. These documents are submitted as part of the full planning application and should be read alongside this section of this Planning Statement.

Legislation and National Planning Policy

- 12.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 12.4 Section 72 (1) of the same Act provides that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas when exercising planning functions which may impact them.
- 12.5 Chapter 16 of the NPPF sets out the policies relating to the conservation and enhancement of the historic environment. Paragraph 194 specifies 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.”



- 12.6 Paragraph 199 states that “when considering the impact of a Proposed Development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation.”
- 12.7 Paragraphs 200 and 201 provide a definition and the approach to harm which notes that “any harm to, or loss of, the significance of a designated heritage asset...should require clear and convincing justification.”
- 12.8 Paragraph 202 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, where appropriate, securing its optimum viable use.”
- 12.9 The PPG on the Historic Environment (previously Conserving and Enhancing the Historic Environment) (2019) provides further guidance when assessing the impact of development proposals affecting heritage assets. It sets out that “significance” derives not only from a heritage asset’s physical presence, but also from its setting. It sets out that “public benefits” may follow from many developments and could be anything that delivers economic, social or environmental objectives as described at Paragraph 8 of the NPPF.

Regional Planning Policy

- 12.10 London Plan Policy HC1 (Heritage conservation and growth) outlines 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. The policy is clear that the cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 12.11 London Plan Policy HC3 (Strategic Local Views) outlines a list of designated Strategic Views and states that “Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.” Part G of Policy HC3 states that boroughs should clearly identify important local views in their Local Plans and strategies; it states that local views should be protected and managed in a similar manner as Strategic Views.



- 12.12 London Plan Policy HC4 London View Management Framework relates specifically to London's designated Strategic Views. As considered in Section 6, the Proposed Development will not adversely impact on any LVMF views.
- 12.13 London Plan Policy D8 (Public realm) states that development proposals should address visual impacts, including an analysis through long-range, mid-range and immediate views from the surrounding streets; architectural quality and materiality of an exemplary standard and consider nearby heritage assets and their settings.
- 12.14 London Plan Policy D9 (Tall buildings) states tall buildings should consider the visual impacts, specifically on long range, mid-range and immediate views from surrounding streets (part C(a)). Part C(d) of this policy states that proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. It goes on to state that proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. Tall buildings should positively contribute to the character of the area.
- 12.15 The Site falls within LVMF View 2A.2 & 2B.1 from Parliament Hill and View 4A.2 from Primrose Hill and is technically visible in View 19.A1 from Lambeth Bridge. The LVMF SPG (2012) states that the scale of new developments should be compatible with the composition of these views. The guidance notes that development in the background of the Palace of Westminster should preserve or enhance the viewer's ability to recognise and appreciate the strategically important landmark.

Local Planning Policy

- 12.16 Policy D1 (Part M & R) (Design) of the Camden Local Plan states that high quality design within development proposals should preserve strategic and local views, as well the relationship between the building and hills and views.
- 12.17 The supporting text of Policy D1 (Paragraph 7.27) notes that LBC will protect the key views in accordance with London-wide policy and will resist proposals that would harm them. It is further stated that developments should not detract from the panorama as a whole and should fit in with the prevailing pattern of buildings and spaces.

- 12.18 Policy D2 (Heritage) of Camden’s Local Plan states that LBC will preserve and where appropriate, enhance LB Camden’s rich and diverse heritage assets and their settings. In respect of designated heritage assets, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage assets unless the public benefits of the proposal convincingly outweigh that harm.
- 12.19 Paragraph 6.43 of the Camden Local Plan notes that LBC will continue to use guidance within conservation area appraisals and management strategies to preserve and enhance the built environment around Hampstead Heath and preserve outlooks and views from it which include protected views from Parliament Hill to the Palace of Westminster.

Townscape and Views – Assessment

- 12.20 The Euston Tower in its current form is not critically acclaimed as a distinguished work of architecture and has never been considered in detail for listing by Historic England. The interest of the Euston Tower is mainly for its role in the speculative commercial development boom of the 1960’s. Architecturally it has some limited interest for its surviving original curtain walling and unusual pinwheel plan form, but its architectural quality is, at best, unremarkable.
- 12.21 In agreement with LB Camden officers, 23 views have been selected to assess the potential effects of the Proposed Development on visual amenity and townscape character and to inform the Townscape, Visual and Built Heritage Assessment (‘TVBHA,’ Volume 2 of the Environmental Statement) which has been prepared by the Tavernor Consultancy in line with London Plan Policy D9 (part C(a)). Cityscape Digital has prepared the visualisations of the views. For the purposes of the assessment, cumulative schemes have been illustrated and assessed within the views where relevant. Further details of the townscape assessment can be found in Volume 2 of the Environmental Statement however key conclusions are summarised below.
- 12.22 The existing Euston Tower is a well-established feature of the townscape setting of Bloomsbury, Fitzrovia and Regent’s Park and a prominent landmark in views along Euston Road, Hampstead Road and Tottenham Court.
- 12.23 The existing Euston Tower is clearly visible in the following LVMF views and therefore the Proposed Development would also be clearly visible:

- a. LVMF 2A.2: Parliament Hill: the summit; defining the left hand site of the Protected Vista
 - b. LVMF 2B.1: Parliament Hill: east of the summit; outside the Protected Vista
 - c. LVMF 4A.2: Primrose Hill: the summit; outside the Protected Vista
- 12.24 The TVBHA concludes that the effects on LVMF London panoramas from Parliament Hill and Primrose Hill would be beneficial in nature but would not be significant. The Proposed Development would enhance the appearance of the existing Euston Tower and would form a high-quality landmark of comparable scale to the existing tower within the panorama. The Proposed Development would not have any impact on the ability to recognise and appreciate the Palace of Westminster in either view, this is echoed in the feedback from Historic England (dated 7 November 2023) which states that “in long-distance views, the height of the building would be comparable to the present tower, so, for example, would not encroach on LVMF views of the Palace of Westminster.”
- 12.25 In addition to the above, there are two assessment points upstream from Lambeth Bridge (LVMF 19A.1 and 19A.2.) A Protected Silhouette of the Palace of Westminster is applied at and at all points between Assessment Points 19A.1 and 19A.2. The existing Euston Tower is technically visible but not perceptible close to the east of Assessment Point 19A.1; the very top of the existing Euston Tower is technically visible at a low point between pinnacles on the Palace of Westminster but is seen at a distance of approximately 3.5km, and the potential visibility is well screened by foreground trees even in winter. There would be no perceptible change to the composition of LVMF River Prospect 19A and no effect on the Protected Silhouette of the Westminster WHS in views downstream from Lambeth Bridge. This view is echoed by Historic England in their feedback dated 7 November 2023.
- 12.26 Several local views were also assessed and included within the TVBHA, which concludes that effects on non-designated local views would range from negligible to moderate in scale and would be either beneficial or neutral in nature.
- 12.27 Discussions regarding the alignment of the Proposed Development along Hampstead Road were held with officers at both GLA and LBC. Following feedback during the pre-application process, the massing along Hampstead Road was amended and brought inwards to align with the building directly to the north. This would reinforce the street and would draw the eye towards BT Tower.

Officers noted the projected podium could block views of the listed building and suggested views from various points along Hampstead Road to determine the impact of the podium projection and ground floor realignment on the BT Tower.

- 12.28 Accordingly, a number of viewpoints have been assessed looking south down Hampstead Road (views 9, 10 and 11). These assess the proposal in the context of views to the BT Tower. BT Tower is widely visible and recognisable and is Grade II listed. The increase in the footprint of the Proposed Development on Hampstead Road, would partially reduce the visibility of the BT Tower over a length of about 100m at the northern end of Hamstead Road, however, the distinctive articulated silhouette of the BT Tower would remain legible and recognisable beyond the Proposed Development.
- 12.29 The architectural approach to the massing of the Proposed Development would mitigate the visual impact of the increased breadth of these views, through the sub-division of the building into four slender quadrants with inclined facades and separated by clearly defined vertical ‘breathing spines’, this would help to effectively break up its overall scale and provide the Proposed Development with a dynamic form.
- 12.30 In summary, the Proposed Development is in accordance with national, regional, and local planning policies in relation to townscape.

Heritage – Assessment

- 12.31 The existing building is not locally listed by LBC and is not located in a conservation area. An application for a Certificate of Immunity from Listing (‘COIL’) was submitted to Historic England in July 2023. As of December 2023, no decision has been received.
- 12.32 The Site is not within a designated conservation area. However, within 500m of the site, there are seven conservation areas. These surrounding conservation areas lie within both LBC and, to the west, Westminster City Council. The impact of the Proposed Development on the three closest Conservation Areas is set out in the TVBHA and summarised as follows.
- 12.33 Fitzroy Square Conservation Area (within LBC) is located to the south of the site. This Conservation Area is characterised by Georgian Townscape, however with the visibility of taller



- more modern townscape to the north along Euston Road and the south, notably the presence of the BT Tower. The TVBHA concludes that while there is the potential for the Proposed Development to further detract from the ability to appreciate the significance of the conservation area, there is also the potential for some of the existing harm (caused in particular by the existing Euston Tower) to be mitigated by the design of the Proposed Development.
- 12.34 View 19 taken from Fitzroy Square looking north east towards the Euston Tower has been assessed. Fitzroy Square is located in the Fitzroy Square Conservation Area and is enclosed on all sides by Grade I and Grade II* Listed buildings (save for no.14 Fitzroy Square which is unlisted). While the scale of the impact of the Proposed Development on the view would be equivalent, the appearance of the Euston Tower would be noticeably changed. There is the potential for some of the existing harm (caused in particular by the existing Euston Tower) to be mitigated by the design of the Proposed Development.
- 12.35 Bloomsbury Conservation Area (within LBC) lies to the south east of the site. Similarly with the Fitzroy Square CA, the contrast of the conservation area with parts of its now well established post-war and modern setting along Euston Road highlights the fine grain and historic character of the historic townscape of the conservation area but the modern setting is not judged to make any material contribution to the appreciation of the heritage significance of the conservation area. While there is the potential for the Proposed Development to further detract from the ability to appreciate the significance of the conservation area there is also the potential for some of the existing harm (caused in particular by the existing Euston Tower) to be mitigated by the design of the Proposed Development.
- 12.36 View 18 has been taken from Bedford Square looking north towards Euston Tower. It is noted that the existing Euston Tower is partially visible above the roofline of these terraces. Given no additional height is proposed, part of the very top of the Proposed Development would also be seen behind the rooftop structure. The visibility of the Proposed Development would not intrude above the predominant foreground roof line or otherwise interrupt the ordered enclosure of the square. It would not therefore draw the eye or be a noticeable element in the backdrop of the square.
- 12.37 Regent's Park Conservation Areas (within LBC and WCC) lie to the west of the Proposed Development. It is noted that the scale and proximity of the modern setting (including the

- existing Euston Tower) seen above the treeline of the park, and the rooflines of the historic terraces in characterising views across the park, has eroded the ability to appreciate the pastoral, picturesque intent of the original design and is considered to detract from the ability to appreciate the significance of the park. The susceptibility to change of the setting to the south-east of the park is limited by the existing well established taller modern setting. The TBVHA notes that while there is the potential for the Proposed Development to further detract from the ability to appreciate the significance of the park, it is seen within the context of other existing tall buildings limiting its impact and there is also the potential for some of the existing harm (caused in particular by the existing Euston Tower) to be mitigated by the design of the Proposed Development.
- 12.38 Feedback from Historic England (dated 7 November 2023) recognises that “the present Euston Tower is already an assertive building in the setting of nearby heritage assets; it is alien to and detracts from the Fitzroy Square Conservation Area’s historic scale and rooflines and imposes on otherwise semi-natural designed landscape views in some areas of Regent’s Park.”
- 12.39 In summary, the existing levels of ‘harm’ to significance of local heritage assets, caused by the existing Euston Tower, would not be removed, or materially reduced by the Proposed Development. The Proposed Development would therefore continue to give rise to ‘harm’ in NPPF terms to the significance of listed buildings and conservation areas in the study area. This harm is in all instances judged to be at the same scale as that caused by the existing Euston Tower, which is ‘less than substantial’, generally at the lower end of the scale but in some instances at the middle of that scale.
- 12.40 Any perceived harm arising from the development would be less than substantial and outweighed by the substantial public benefits outlined in Section 1 of this Statement.
- 12.41 In terms of heritage impact, the Proposed Development has therefore been assessed in line with national, regional, and local planning policy.

13 Landscaping and Public Realm

- 13.1 This section assesses the proposals in terms of landscape and external public realm proposed at the Site.

National Planning Policy

- 13.2 NPPF Chapter 15 seeks to conserve and enhance the natural environment. Specifically, Paragraph 179 which seeks to protect and enhance biodiversity.

Regional Planning Policy

- 13.3 London Plan Policy D8 (Public realm) sets out the characteristics that new public realm designs should meet. The policy notes that all development proposals should encourage and explore opportunities to create new public realm where appropriate.
- 13.4 The policy advises that all public realm associated with development proposals should be well-designed, safe, accessible, inclusive, attractive, well-connected and easy to understand, service and navigate. The elements that will contribute to a successful public realm such as landscape treatment, planting, street furniture and surface materials should be of good quality.
- 13.5 Part H of Policy D8 notes that appropriate management and maintenance arrangements should be in place for the proposed public realm which maximises public access and minimises rules governing the space to those required for safe and effective management. GLA guidance, the Public London Quarter, sets out eight objectives for both internal and external public realm management across London.
- 13.6 Policy G5 (Urban greening) of the London Plan sets a requirement for major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature based-sustainable drainage. The Policy states that boroughs should target an Urban Greening Factor score of 0.4 for predominantly commercial developments.
- 13.7 London Plan Policy G6 (Biodiversity and access to nature) states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should

be informed by the best available ecological information and addressed from the start of the development process.

- 13.8 The Accessible London: Achieving an Inclusive Environment LPG (2014) states that London’s public space should be secure, accessible and inclusive and incorporate the highest design of landscaping. The SPG emphasises that major development should strengthen the connection between public spaces and existing local features and where appropriate the public realm should promote the heritage values of the place. Additionally, major development must consider the landscaping of the place by incorporating the highest quality street furniture and infrastructure while ensuring easy movement of people through space.
- 13.9 The Urban Greening Factor LPG (2023) supports the policy on Urban Greening set out in the London Plan. The UGF is designed to provide flexibility to: enable an appropriate response to meeting local green infrastructure priorities and site-specific constraints; and respond to different uses within a development.

Local Planning Policy

- 13.10 Policy A2 (Open Space) of the Camden Local Plan seeks to protect and enhance access to open space and green infrastructure within the borough. To secure new and enhanced open space, Part M of Policy A2 states that new development proposals within the Camden will be required to apply a standard of 0.74 sqm per occupant for commercial developments while taking into account any funding for open spaces through the Community Infrastructure Levy.
- 13.11 The supporting text of Policy A2 (Paragraph 6.48) notes that where new open space is provided, the characteristics of the site and local context should be taken into account which include existing street patterns and pedestrian routes. It is stated that open space should be inclusive for all ages and should consider the potential barriers that can be experienced by people with physical and sensory disabilities.
- 13.12 The long-term ability for a space, including landscaping, planting, street furniture and surfaces which can be managed effectively and with demands on natural resources minimised will be an important consideration in the assessment of development proposals.

- 13.13 CPG: Public Open Space (January 2021) provides further guidance and outlines the Council's expectation for the provision of new open space, including play facilities, to provide for equality of access.
- 13.14 Within the Euston Area Plan, Euston Tower sits as an anchor point at the corner of Hampstead Road and Euston Road where the plan indicates an aspiration to enhance the existing pedestrian and cycle experience along Hampstead Road with a focus on improvements to existing crossings along Euston Road.
- 13.15 The Healthy Street for London (2017) and Euston Health Streets (2021) guidance promotes aspirations for public realm improvements including greener streets and improvements to pedestrian and cycling routes.
- 13.16 Draft Policy KQ1 (Part H) states that major developments in the KQ should contribute towards the provision of public realm enhancements and transportation improvements including transforming pedestrian and cyclist movement within the Euston Road corridor.

Assessment

- 13.17 The landscaping and public realm proposals have been designed by DSDHA who have a wealth of experience in designing these types of schemes including at Broadgate, Camden's West End Project, Central Somers Town and the British Library extension proposals. DSDHA has worked alongside QCIC who prepared the Crime Impact Assessment and 3XN.
- 13.18 The proposal seeks to enhance the public realm within Regent's Place Plaza and around the perimeter of Euston Tower. Early engagement was undertaken with Camden and TfL to discuss the public realm strategy in order to enhance the pedestrian and cyclist experience. The proposals have also been designed to aspire to Camden Council's Bloomsbury Green Corridor project which was launched earlier this year. The ambition for the project is to identify a series of green spaces and links across the Bloomsbury area to connect the Euston station masterplan in the north to the River Thames in the South.
- 13.19 The site has several environmental constraints including poor air quality, wind, noise and road safety. Co-design workshops were held in 2023 to understand the type of space required by the local community. The feedback included space to protect from the wind and rain; a

- water feature and safe spaces for children to play; a flexible space that accommodates the changing needs of the community and a space that people feel welcome.
- 13.20 The design proposals seek to enhance the public realm through providing a series of activated landscapes arranged around a civic square. A new terraced landscape has been designed to invite the general public to the first floor of the podium. This would also include a 1:20 ramp suitable for wheelchairs and pushchairs and would include planting and seating. There are also opportunities to improve pedestrian routes around the perimeter of the site through the removal of street clutter and introduction of new soft landscaping features. New street furniture would include benches (including with armrests and backrests), street lighting,, cycle stands together with a comprehensive site wide CCTV system and, where necessary Hostile Vehicle Mitigation ('HVM').
- 13.21 The design of the public realm reflects the ecosystem of nearby Hampstead Heath namely heathland, grassland, woodland and wetland (further details are contained within the Landscape Statement, prepared by DSDHA).
- 13.22 The soft and hard landscaping features chosen to respond to the movement, climate and activity of those using the space.
- 13.23 The proposed Euston Road frontage would accommodate a new ramped cycle entrance and a shared pedestrian and cycle lane measuring 4.5m in width. Landscaped mounds are proposed to shield users of the Regent's Place Plaza from noise, pollution and wind.
- 13.24 Brock Street includes generous soft landscaping measures including landscaped mounds.
- 13.25 Within the tower, there are a number of proposed amenity green spaces, planted terraces and a biodiverse roof.
- 13.26 In line with the requirements set out within Camden's Public Open Space CPG, the Proposed Development is required to provide between 203 sqm (maximum density scenario) and 305 sqm (minimum density scenario) of additional public open space. This provision has been calculated by following the Employment Density Guide (3rd Edition), November 2015.
- 13.27 The CPG confirms that the public open space provision is calculated based on the provision of additional floorspace as part of development proposals, split by land use Net Internal Area

(NIA). Given the majority of the existing floorspace is in office use, (31,606sqm NIA) there is an overall loss of purely office floorspace (by 31sqm NIA). Therefore, in accordance with the methodology set out within the CPG, there is no requirement to calculate the public open space provision relating to Class E(g)(i) (General Offices).

13.28 There is, however, an uplift in Use Class (E(g)(ii) (R&D Space), (16,487sqm NIA). The public open space requirement has therefore been calculated on this basis. The full breakdown of the public open space calculation is as follows:

Use Class B1b (R&D Space) – Density: 40-60sqm	
Existing Floorspace (NIA)	0sqm
Proposed Floorspace (NIA)	16,487sqm
Total Uplift (NIA)	16,487sqm

Public Open Space Calculation

'Minimum' Provision – 60sqm Density	
$(16,487 / 60) \times 0.74 =$	203sqm
'Maximum' Provision – 40sqm Density	
$(16,487 / 40) \times 0.74 =$	305sqm

13.29 In line with CPG guidance, the maximum additional public open space required to be provided is 305 sqm. Overall, the Proposed Development would deliver 5,832sqm of public open space. This represents an increase of 438 sqm and is therefore compliant with the minimum requirements set out with the Public Open Space CPG.

13.30 The lighting strategy has been prepared by Arup and is set out within the DAS.

- 13.31 Social sustainability is a driving factor in the development of the lighting strategy. The night-time environment is welcoming and accessible to all, lighting would facilitate improved access for marginalised community users.
- 13.32 Key routes are delineated through balanced, sensitive and appropriate use of light, to encourage clear movement and legibility across site in the hours of darkness, avoiding over-lighting, minimising the effects of stark contrast and glare.
- 13.33 Lighting would also be employed to differentiate key elements such as building entrances and cycle parking.
- 13.34 A detailed lighting strategy will be developed at a further design stage and would reinforce the unique Regent's Place identity.
- 13.35 In respect of the UGF, the proposal seeks to provide significant planting opportunities together with a biodiverse roof and wetland sustainable drainage systems. The expected urban greening factor is over 0.3 in line with the London Plan Policy G6 target.
- 13.36 The upcoming BNG mandate to be set out within the Environment Act 2021 states that a target of 10% net gain in biodiversity should be reached. In line with London Plan Policy G6, the opportunities to enhance the biodiversity within the public realm have been explored from the outset.
- 13.37 Greengage have undertaken a Biodiversity Net Gain Assessment and has calculated the existing biodiversity of the site to be 2.44 Habitat Units ('HU'). Based on the landscape plans prepared by DSDHA, the Proposed Development is predicted to provide a net gain of 0.66HU, which equates to a BNG figure of 26.9%. This exceeds the upcoming mandate within the Environment Act 2021 and is in line with objectives set out within London Plan Policy G6.
- 13.38 The proposal seeks to maximise public realm and landscaping opportunities and is considered to align with planning policy.

14 Energy and Sustainability

- 14.1 This section assesses the proposals in terms of energy and sustainability against the relevant planning policy and guidance documents.

National Planning Policy

- 14.2 Paragraph 20 (Part D) of the NPPF encourages strategic polices to consider the conservation of the natural, built and historic environment including landscapes, green infrastructure and planning measures to address climate change mitigation and adaptation.

- 14.3 Chapter 14 of the NPPF outlines how planning policies should meet the challenge of climate change, flooding and coastal change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

Regional Planning Policy

- 14.4 In accordance with the key national objectives, the London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.

- 14.5 Policy SI 2 (Minimising greenhouse gas emissions) of the London Plan relates to minimising greenhouse gas emissions and states that major development should be net-zero carbon which means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy as set out below:

- i. **Be Lean:** use less energy and manage demand during operation
- ii. **Be Clean:** exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly

- iii. **Be Green:** maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - iv. **Be Seen:** monitor, verify and report on energy performance
- 14.6 Part C of Policy SI2 states the requirement for a minimum on-site reduction of 35% beyond building regulations for major developments and that major commercial developments should achieve 15% through energy efficiency measures. Any shortfall should either be provided by a payment in lieu or an off-site solution.
- 14.7 Part F of Policy SI2 state that proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
- 14.8 Policy SI 4 (Managing heat risk) of the London Plan notes that development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. Major development proposals should demonstrate, through the submission of an energy strategy, how they will reduce the potential for internal overheating and reliance on air conditioning systems.
- 14.9 Policy SI7 (Reducing waste and supporting the circular economy) of the London Plan states that referable applications should promote circular economy outcomes and aim to be net-zero waste. As part of development proposals, a circular economy statement should be submitted to demonstrate the key aims set out in the policy.
- 14.10 Policy G5 (Urban greening) of the London Plan states that major development proposals should contribute to the increased greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping, green roofs, green walls and nature-based sustainable drainage.
- 14.11 London Plan Policy G6 (Biodiversity and access to nature) part 'D' states that Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 14.12 The LPG Energy Assessment Guidance (2022) states that all major developments must continue to meet the London Plan net zero carbon target by following the energy

hierarchy targets (Policy SI 2), the heating hierarchy (Policy SI 3) as part of their energy strategy.

Local Planning Policy

- 14.13 Policy CC1 (Climate change mitigation) of the Camden Local Plan notes that LBC requires 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.
- 14.14 All development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan. The policy requires all proposals for substantial demolition to demonstrate that it is not possible to retain the existing building.
- 14.15 LBC also 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.
- 14.16 Policy CC2 (Adapting to climate change) of the Local Plan requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures. The policy also seeks to promote the incorporation of sustainable design and construction measures within developments.
- 14.17 CPG: Energy Efficiency and Adaptation (adopted in January 2021) provides further guidance to ensure that the Council's commitment of reducing carbon emissions is achieved. This document includes a cascade regarding the demolition of existing buildings and whole life carbon cycles.
- 14.18 In June 2020, LBC approved a 5 year "Climate Action Plan" which creates a framework for action across all aspects of the borough with the aim of achieving zero carbon by 2030.
- 14.19 Objectives and actions that affect the Proposed Development include:
- From 2020, all major developments in Camden are required to be zero carbon (as per the London Plan 2021 definition)

- From 2020, all major developments in Camden are required to calculate whole life-cycle carbon emissions to include all operational and embodied carbon.
- Public spaces will encourage and enable healthy and sustainable travel choices and promote biodiversity.

Assessment

14.20 The following sections summarise the Proposed Development's Energy, Sustainability, Whole Life Carbon and Circular Economy strategies against relevant national, regional and local planning policies.

Energy

- 14.21 The Proposed Development includes an ambitious energy and carbon reduction strategy. Through a combination of innovative and best practice energy reduction measures, the proposed mixed-use development achieves an overall reduction in regulated carbon dioxide emissions of 14% against Part L 2021.
- 14.22 It is acknowledged that the current predicted on site reduction falls short of the GLA's 35% on-site carbon reduction over the current Part L (2021). The 'Note to accompany GLA Energy Assessment Guidance 2022' acknowledges that non-residential developments may find it more challenging to achieve significant on-site carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35% improvement. The Note highlights that applicants are still expected to follow the energy hierarchy set out in London Plan S12 to maximise carbon savings. Further details of how this hierarchy has been followed are set out in this Chapter.
- 14.23 The previous parameters of the Part L 2013 notional building meant that the GLA's required 35% improvement were considerably more achievable when this was used as the baseline (compared to the more up-to-date and stretching 2021 regulations). For reference, during the pre-application meeting with the GLA held 20/09/23, initial results, relating to an earlier iteration of the Proposed Development, were shown to be exceeding the Part L 2013 baseline by around 36%. Based on the current Proposed Development and servicing strategy, correlating with the performance against the Part L 2021 baseline as is demonstrated in this



document, it is estimated that the improvement against the Part L 2013 baseline would be even more than the 36% previously identified in those discussions.

- 14.24 Further details and explanation as to why the Proposed Development achieves an overall reduction in regulated carbon dioxide emissions of 14% beyond Part L 2021 are set out within the submitted Energy Statement, prepared by Arup.

Be Lean

- 14.25 The Proposed Development applies passive design principles including the specification of a high-performance building fabric and carefully considered solid to glazing ratio to reduce energy demand. Effective active systems are proposed to then meet this reduced demand as efficiently as possible.
- 14.26 Optimised glazing percentages to maximise daylight to the interior of the building, whilst minimising overheating are proposed throughout the building façade design. These façade elements project both horizontally and vertically, adjacent to glazing which provide solar shading during the summer, but also allow for solar gain during winter.
- 14.27 The underfloor ventilation system avoids the need for active cooling for large parts of the year, via on-floor AHUs, also avoiding the need for high-level mechanical services which significantly reduces embodied carbon.

Be Clean

- 14.28 In accordance with the GLA heating hierarchy in Policy SI2, the Proposed Development is enabled for future connection to any renewable local heat networks once available, although none are available currently or expected to be available in the near-term.
- 14.29 Low carbon generation of heat using Air Source and Water Source Heat Pumps is proposed.
- 14.30 The development is designed to avoid all on-site emissions, using an all-electric heating and cooling strategy, therefore no gas boilers or CHP are proposed as part of this development.



Regent's Place is supplied by 100% Renewable Energy Guarantee of Origin backed (REGO) electricity.

Be Green

- 14.31 Heating and cooling would be provided to the development by central heating and cooling plant consisting of air-cooled chillers and simultaneous air source heat pumps (ASHPs) to maximise the ability to share heat between spaces within the building.
- 14.32 The installation of PV panels is included within the scheme to contribute to the reduction of the on-site carbon emissions. Approximately 100 sqm is planned to be installed at roof level.
- 14.33 The carbon off-set has been calculated on the remaining regulated carbon emissions post Be Green stage. A carbon offsetting price of £95/tonne of CO₂ has been used in line with the London Plan to calculate the resulting offset requirement and cash in-lieu contributions, even though the campus is supplied by REGO-backed renewable energy. The cumulative shortfall in target CO₂ savings (over 30 years) is 8,956 tonnes which equates to an offset payment of £795,581 in line with part 'c' of London Plan policy SI2. The final payment would be secured via a S106 financial contribution.

Be Seen

- 14.34 The GLA's 'Be Seen' spreadsheet with performance indicators including contextual data, building energy use and carbon emissions for the Proposed Development has been submitted as part of the application.
- 14.35 The energy performance of the Proposed Development has been assessed using a CIBSE TM54 compliant methodology to provide an assessment of regulated and non-regulated energy consumption.
- 14.36 A comprehensive NABERS Design for Performance assessment will be carried at a later stage of design development.

Sustainability

- 14.37 The Proposed Development adopts a sustainable approach across all areas of design, construction, and operation which has been at the forefront of design throughout the process. The objective is to ensure that it delivers innovative approaches and best practice sustainability performance that is fit for now and the future.
- 14.38 The Proposed Development includes a range of sustainable strategies and approaches which are summarised below.
- 14.39 The Proposed Development is targeting BREEAM 'Outstanding' for the office floorspace, with BREEAM 'Excellent' for the retail areas.
- 14.40 Green/blue roofs are proposed, in addition to planted areas and bio-retention features in the landscaping, as part of a Sustainable Drainage System (SuDS) that manages surface water runoff and filters rainwater. Surface water runoff rates of 3.0l/s and a 96% reduction in surface water discharge is envisaged compared to the existing Euston Tower.
- 14.41 Mitigation to reduce the urban heat island effect include green roofs, public realm planting and planting across terraces. The proposal seeks to target an UGF score of over 0.3, and a BNG of over 26% which exceeds the minimum targets in national, regional and local planning policy.
- 14.42 The proposal has been designed to be air quality neutral, which is achieved through an all-electric on-site infrastructure with no combustion for heating or cooling, save for provision for an on-site back-up generator only.
- 14.43 The development is entirely car free, save for two Blue Badge spaces located at basement level. A total of 951 cycle spaces are to be provided, with end of trip facilities to encourage active travel choices.

Whole Life Carbon

- 14.44 The Proposed Development is targeting net zero carbon in construction and operation.

- 14.45 A Whole Life-cycle Carbon Assessment (WLCA) has been conducted by Sweco and GXN as part of this planning application.
- 14.46 Feasibility stage WLCAs have been produced during the pre-application stage with the aim of establishing the Proposed Development's baseline embodied carbon performance, as well as investigating design and specification alternatives to reduce the carbon intensity of the main building materials. The assessment was carried out in accordance with British Standard BS EN 15978:2011 and following guidance from the RICS PS (September 2023) and the GLA Whole Life-cycle Carbon Assessment Guidance.
- 14.47 The following principles have been adopted to reduce embodied carbon:
- Retention of the existing foundation, substructure, and central core;
 - Optimisation of structural, facade, and MEP designs to reduce material intensity;
 - Improved concrete specification and higher quantities of cement replacement;
 - High recycled content aluminium and glass in facades;
 - Reduction of emissions associated with transport; and
 - Reduction of emissions associated with site operations.
- 14.48 The current analysis results in the following estimates:
- Upfront carbon [A1-A5] 733 kgCO₂e/m² GIA
 - Whole life-cycle embodied [A-C excl. B6&B7] 1,262 kgCO₂e/m² GIA.
 - Whole life-cycle carbon [A-C incl. B6&B7] 2,894 kgCO₂e/m² GIA
- 14.49 All figures include emissions due to demolition in the totals, which is not included in the totals in the GLA spreadsheet. The current upfront estimate is below the GLA upfront benchmark of 970 kgCO₂e/m² GIA for offices, though above the GLA aspirational benchmark (650 kgCO₂e/m² GIA). This is understandable given the stage of the project and it is expected to



reduce during the detailed design stages as more detail is developed, materials are specified, and procurement strategies are developed.

14.50 The approach to WLC is therefore in line with regional and local planning policies.

Circular Economy

14.51 The Proposed Development includes a pioneering approach to circular economy throughout design, construction, and operation.

14.52 A thorough, three volume feasibility study has been carried out by GXN, which studies the condition and potential for reuse of the existing building, together with assessing options and opportunities for deconstruction and retention. It concludes that the optimum approach is to retain 31% of the existing structure, which includes the central core, basement and foundations.

14.53 Further details are set out within the submitted feasibility reports and summarised in Chapter 8 of this Statement.

14.54 An innovative approach is being taken to minimising waste and carbon emissions through deconstruction and construction, identifying opportunities to reuse, recycle and upcycle building materials. The applicant and design team are seeking to explore innovative new approaches for structural reuse of concrete and recycling of building glass at scale, with an ambition to publish findings from these tests. 98% of the demolition waste would be diverted from landfill, 96% of the construction waste would be diverted from landfill and 95% of excavation waste would be put to beneficial use in accordance with this strategy.

14.55 Reused and/or high recycled content materials would be specified, where possible, for new construction targeting at least 25% recycled material by value.

14.56 The overall approach to design is to create a building which is flexible and adaptable for the long-term, reducing waste and avoiding the challenges of the existing building. Particular attention has therefore been taken to designing a structure which is easily adaptable to respond to and accommodate the needs of future uses and occupiers.



14.57 These objectives are in line with and exceed ambitions set out within the London Plan, Local and Camden Planning Guidance Energy Efficiency and Adaptable CPG.

15 Transport and Servicing

- 15.1 This Chapter assesses the proposed transport and an associated servicing arrangements against the relevant planning policy and further guidance documents.

National Planning Policy

- 15.2 Chapter 9 of the NPPF sets out the Government’s policies relating to sustainable transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to wider sustainability and health objectives.
- 15.3 One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. Paragraph 105 states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.
- 15.4 Paragraph 106 states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities. In addition, attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking should also be provided.
- 15.5 Paragraph 110 notes that opportunities to promote sustainable transport modes should be encouraged, and that transport networks have safe and suitable access for all users and any significant impacts on the highway network have been assessed.

Regional Planning Policy

- 15.6 Policy T1 (Strategic approach to transport) of the London Plan confirms that 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, ensuring that any impacts are mitigated.
- 15.7 Policy T4 (Assessing and mitigating transport impacts) of the London Plan assessing and mitigating transport impacts, requires that when required, transport assessments should be submitted with development proposals to fully assess impacts on transport networks.

- 15.8 Policy T5 (Cycling) of the London Plan requires development proposals help to remove barriers to cycling and create healthy environments in which people choose to cycle. This can be achieved through the provision of cycle parking in accordance with the minimum standards.
- 15.9 Policy T6 (Car parking) of the London Plan restricts car parking in line with levels of existing and future public transport accessibility and connectivity. Appropriate disabled persons parking for Blue Badge holders should however be provided, as set out in Policy T6.5 (Non-Residential Disabled Persons Parking).
- 15.10 Policy T6.2 (Office parking) of the London Plan provides the maximum parking standards that should be applied to new office developments. The supporting text states that the management of parking that is provided should ensure that employees and visitors are encouraged to use non-car modes of transport as much as possible.
- 15.11 The Mayor's Transport Strategy, 2018 aims for 80% of all trips to be made in London on foot, by cycle or using public transport by 2041. The Healthy Streets Approach aims to improve air quality, reduce congestion and help make London's diverse communities greener, healthier and more attractive places to live, work, play and do business.

Local Planning Policy

- 15.12 Policy T1 (Prioritising walking, cycling and public transport) of Camden's Local Plan seeks to promote and prioritise sustainable modes of transport such as walking, cycling and public transport across the borough. In pursuance of this, LBC 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 will be supported.
- 15.13 Part H of Policy T1 states that LBC will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within LBC's Transport CPG (January 2021).
- 15.14 Policy T2 (Parking and car-free development) of Camden's Local Plan states that LBC will limit the availability of parking and require new development in the borough to be car free. The supporting text states that parking will only be considered for new non-residential developments where it can be demonstrated that the parking provided is essential to the use or operation of the development.



- 15.15 The Euston Area Plan seeks to improve accessibility, promote walking and cycling and enhance the public realm to reduce pressure on the public transport network.

Assessment

- 15.16 The Transport Assessment and associated transportation documents have been prepared by Velocity. The reports have been prepared with a focus on the Healthy Streets Approach. The site is located within a highly accessible area and has an 'Excellent' PTAL of 6b. The proposal has been designed to be car free (with the exception of two blue badge spaces within the basement) and to promote walking and cycling. The proposal would not have an adverse impact on the existing transport network or highway safety.
- 15.17 The proposal seeks to promote pedestrian movement around the base of the tower by providing inviting and safe public realm.
- 15.18 The proposal includes 861 long stay cycle spaces within the basement which would be provided as Sheffield stands, two tier cycle stands, foldable bicycle parking and larger Sheffield stands. The proposal would also include 574 lockers, 72 showers (including two accessible showers) and six toilets. Cycle maintenance facilities and water dispensers are also envisaged.
- 15.19 The proposal also includes 90 short stay cycle parking spaces which would be provided in the public realm including two enlarged spaces to accommodate larger cycles including cargo bikes.
- 15.20 In respect of pedestrian comfort, it is considered that the proposed footpaths would comfortably meet the forecast for peak pedestrian flows.

Deliveries and Servicing

Regional Planning Policy

- 15.21 Policy T7 (Deliveries, servicing and construction) of the London Plan relates specifically with deliveries, servicing and construction as part of development proposals. New consolidation and distribution facilities proposed should be supported provided that they do not cause unacceptable impacts on London's strategic road networks. It is further noted that road danger, noise and emissions from freight trips should be reduced, and sustainable last-mile movements should be enabled including by cycle and electric vehicle.



Local Planning Policy

- 15.22 Policy T4 (Sustainable movement of goods and materials) of Camden's Local Plan states that the council will promote the sustainable movement of goods and materials. Developments of over 2,500sqm likely to generate significant movement goods or materials by road (both during construction and operation) will be expected to minimise the impact of freight movement via road by prioritising the use of Transport for London Road Network or other major roads, accommodate goods vehicles on site and provide construction management plans and transport assessments where appropriate.
- 15.23 Policy CC5 (Waste) of Camden's Local Plan of the Camden LP outlines that LBC will seek to make Camden a low waste borough by ensuring that developments include facilities for the storage and collection of waste and recycling.

Assessment

- 15.24 The proposal would utilise the existing vehicle access points into the site via Longford Street and Drummond Street. Loading and unloading is proposed off street within the basement. Eight servicing bays are proposed within a shared servicing area. It is anticipated that the Proposed Development would generate 91 deliveries per day.
- 15.25 Gas deliveries would occur at ground floor level in the northwest corner of Euston Tower. The specialist delivery vehicle would deliver the bottles and piped gas via Triton Square and Brock Street in an area close to the gas store. These deliveries would be managed by the Applicant's management team. The public realm has been designed to accommodate gas deliveries whilst continuing to accommodate pedestrian flows.
- 15.26 Deliveries made by cargo bike would take place via the existing basement ramp. Two basement cargo bike spaces would be provided. Two additional cargo sized parking spaces would also be provided at ground level.
- 15.27 It is envisaged that a Servicing and Delivery Management Plan would be secured via planning conditions or a planning obligation. A draft DSMP has been submitted with this application. The proposal therefore accords with planning policy.

Waste

- 15.28 At a regional level, London Plan Policy SI 7 (Reducing waste and supporting circular economy) requires 65% of any municipal waste to be recycled by 2030. The target set in the London Environment Strategy expects 75% of business waste recycling by 2030 to be targeted.
- 15.29 Policy D3 (Optimising site capacity through the design-led approach) of the London Plan states that ‘Shared and easily accessible storage space supporting separate collection of dry recyclables, food waste and other waste should be considered in the early design stages to help improve recycling rates, reduce smell, odour and vehicle movements, and improve street scene and community safety.’
- 15.30 Furthermore, Policy SI7 (Reducing waste and supporting the circular economy) of the London Plan requires developments to provide adequate, flexible and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.’
- 15.31 Policy CC5 (Waste) of Camden’s Local Plan aims to make Camden a low waste borough by reducing the amount of waste produced and work with the North London partner boroughs to produce a Waste Plan.

Assessment

- 15.32 The proposal includes a dedicated basement waste facility which would separate the waste into residual, DMR, Food and Glass Waste. The proposal includes 57 euro bins/wheeled bins and a portable waste compactor. Clinical waste would be stored within segregated yellow waste bins.
- 15.33 Laboratory waste bins would be provided on each lab floor and then collected and stored within the basement. This would be managed by the on-site facility management team.
- 15.34 In light of the above, the Proposed Development meets regional and local waste policies.

16 Amenity

- 16.1 This section assesses the potential effects of the Proposed Development in terms of amenity, which includes wind and microclimate, air quality, noise, and daylight/sunlight. The technical assessments for these matters are provided within the accompanying Environmental Statement, prepared by Trium.

Wind & Microclimate

Planning Policy

- 16.2 Policy D8 (Part J) (Public Realm) of the London Plan states that development proposals should ensure that appropriate microclimatic considerations, including wind, are taken into account in order to encourage people to spend time in a place.
- 16.3 Policy D9 (Tall buildings) of the London Plan advises that wind conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.
- 16.4 Policy A1 (Managing the impact of development) of Camden's Local Plan states that the Council seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity, including factors such as microclimate.
- 16.5 Supporting text paragraph 6.24 adds that developments should consider local topography and the local microclimate in their design. Developments large enough to alter the local climate will be required to submit a statement demonstrating how the design has considered local conditions.

Assessment

- 16.6 The existing public realm is a windy environment despite measures being taken over the course of last 20 years to mitigate against the impact of wind, in the form of bolt-on canopies to the existing building and landscaping in the public realm. The wind and microclimate within Regent's Place and along Euston Road, Brock Street and Hampstead Road have been a key



theme in the feedback throughout the co-design process and public consultation. Accordingly, the objective to improve the current position has been a key feature of the design process.

- 16.7 Consultation with Arup on the wind and micro-climate has been undertaken throughout the design process. Multiple wind tunnel tests and Computational Fluid Dynamics ('CFD') assessments have been carried out to evolve the design, and iteratively develop wind mitigation through massing adjustments and landscaping design. The final scheme has been tested through wind tunnel testing, adopting the Lawson Comfort Criteria, which describes windiness in terms of acceptability for sitting, standing and walking and compared with the existing baseline.
- 16.8 In summary, the Proposed Development includes a variety of wind mitigation measures, which have been informed by rigorous and iterative testing in both the wind tunnel and using CFD modelling. These measures include the podium design with in-built grilles which disperse wind, landscaped 'mounds' together with a variety of planting measures and strategically placed totems, to further disperse wind where necessary at ground floor level. Consequently, the Proposed Development improves the wind microclimate position in the public realm, in accordance with regional and local planning policies.

Air Quality

Planning Policy

- 16.9 At a national level, Paragraph 185 of the NPPF advises that planning decisions should ensure that development is located appropriately. Development proposals should consider the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the Site or the wider area to effects that could arise from development. In pursuance of this, development proposals should mitigate and reduce to a minimum any potential adverse effects upon amenity.
- 16.10 The NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution (Paragraph 174).
- 16.11 London Plan Policy SI 1 (Improving air quality) states development proposals must be at least air quality neutral and should not:

- a) lead to further deterioration of existing poor air quality;
 - b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;
 - c) create unacceptable risk of high levels of exposure to poor air quality.
- 16.12 Policy CC4 (Air quality) of Camden’s Local Plan requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution.
- 16.13 CPG: Amenity (January 2021) states that all of LBC is a designated Air Quality Management Area (AQMA’) due to the high concentrations of nitrogen dioxide (NO2) and particulate matter (PM10). As such all developments are to limit their impact on local air quality.
- 16.14 CPG: Air Quality (January 2021) states that the Council’s overarching aim is for new development to be ‘air quality neutral’, not lead to further deterioration of existing poor air quality and, where possible, to improve local air quality (‘air quality positive’).
- 16.15 LBC has, since 2000, been designated an AQMA. The LBC Clean Air Action Plan (2023-2026) sets out a variety of actions to help reduce key air pollutants in the Borough arising from road traffic, gas boilers and other sources. The plan seeks to minimise emissions from the construction and operation of new developments by requiring developers to adhere to current and any superseding best practice guidance and supplementary planning guidance.

Assessment

- 16.16 The Proposed Development is located within the borough-wide Camden AQMA, as well as one of the GLA’s Air Quality Focus Areas. An Air Quality Assessment has been undertaken in Chapter 8 of Volume One of the ES, prepared by AQC. A Preliminary Air Quality Assessment is included at Volume 3. This assesses the impact on Air Quality in relation to the deconstruction and construction works and during operation on existing receptors.
- 16.17 The relevant design measures included within the Proposed Development are as follows:
- The scheme has been designed to reduce exposure to emissions with receptors that are sensitive to the 1-hour NO2 objective, located approximately 7m away from the nearest road;

- The energy strategy for the Proposed Development utilises an all-electric system consisting of ASHPs and PVs. High energy efficiency building fabric will be utilised to reduce carbon emissions and energy demand;
- Cycle and pedestrian access and cycle parking will be provided that meets the requirements of Policy T5 of the London Plan; and
- The Proposed Development will be 'car-free', which will assist in facilitating a move towards a car-free lifestyle and promotion of the future use of local public transport.

16.18 As a result of these measures, the Proposed Development is better than Air Quality Neutral in terms of building emissions and Air Quality Neutral in terms of transport emissions, in line with regional and local planning policies.

Noise

National Planning Policy

16.19 The NPPF contains guidance on noise management in planning decisions. Paragraph 185 states that the outcome of planning decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of the development and mitigate noise impacts. This paragraph contains recognition that development will 'often create some noise'.

Regional Planning Policy

16.20 London Plan Policy D14 (Noise) places the responsibility for mitigating impacts from existing noise on the proposed new development. New noise and nuisance-generating development proposed close to noise sensitive uses should put measures in place to mitigate and manage any noise impacts.

16.21 Policy A4 (Noise and vibration) of Camden's Local Plan is clear that the Council will seek to ensure that noise is controlled and managed, and that development should have regard to LBC's Noise and Vibration Thresholds.

16.22 Policy A5 (Basements) of Camden's Local Plan outlines that planning permission for noise generating development will only be granted if it can be operated without causing harm to



amenity. The Council will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.

Assessment

- 16.23 An Environmental Noise Survey report was prepared by Hann Tucker Associates to support the planning application. Noise surveys were carried out in November 2022. The proposal includes plant equipment associated with laboratory and office uses and it is considered that proposed plant would meet Camden's acoustic thresholds. Planning conditions would be imposed to ensure relevant noise thresholds are not exceeded by the plant to be installed as part of the Proposed Development.
- 16.24 The proposal would also require vehicle deliveries into the basement. In addition, gas bottle deliveries would be required at ground level. A servicing management plan would be conditioned to minimise any noise and disturbance.
- 16.25 A Construction Management Plan (CMP) detailing measures to mitigate potential noise and vibration impacts upon nearby noise sensitive premises during construction would be secured via a planning condition or obligation. The principles of 'Best Practicable Means (BPM)', as defined in the Control of Pollution Act, 1974, would be used to ensure the protection of nearby sensitive receptors.
- 16.26 The proposal therefore meets national, regional and local acoustic policies.

Daylight and Sunlight

Planning Policy

- 16.27 Policy A1 (Managing the impact of development) of Camden's Local Plan seeks to protect daylight/sunlight values within existing and Proposed Development. The supporting text (Paragraph 6.5) states that in assessing daylight/sunlight values LBC will consider the most recent guidance published by the Building Research Establishment.
- 16.28 The Building Research Establishment (BRE) Site Layout Planning for Daylight and Sunlight (2022) provides guidance and advice on site layout planning to achieve good sunlighting and daylighting, both within building and in the open spaces between them.

16.29 CPG: Amenity (January 2021) provides further detail on LBC's expectations from development proposals in terms of effects on daylight and sunlight receipt to neighbouring and surrounding properties.

Assessment

16.30 A daylight, sunlight and overshadowing analysis for the proposed development has been carried out by Point 2 in accordance with the BRE guidelines.

16.31 The BRE Guidelines is a document that is applied across the country. Due to its national application, the framework for designers, practitioners, and planning officials to refer to is a 'one size fits all' approach to the assessment of daylight and sunlight. Theoretically, the methodology and subsequent technical specification offered by the BRE Guidelines is applicable to all manner of built environments, ranging from villages to dense city centres, to areas where significant regeneration is taking place (such as Opportunity Areas). Notwithstanding the stark disparity between these environments, the suggested target daylight and sunlight values remain consistent despite a suburban setting having very little in common with inner urban locations. It is clear that the numerical values offered by the BRE as targets are not mandatory and that a practical application of the target values is required. Where appropriate, the BRE Guidelines promote the use of alternative target values to those discussed in the main body of the document.

16.32 It is well established that the BRE Guidelines should be considered flexibly, taking into consideration site specific circumstances and context within the location of the Proposed Development.

16.33 The Daylight and Sunlight assessment prepared by Point 2 assesses 28 residential properties within the vicinity of the site (please refer to paragraph 6.4 within the submitted Daylight, Sunlight and Overshadowing Report for plan identifying these properties, prepared by Point 2). The report concludes that 22 of the 28 residential properties assessed fully adhere to the BRE Guidelines for daylight (VSC and NSL) and sunlight (APSH) and therefore it can be concluded that these properties would not experience any noticeable effects upon their daylight and sunlight amenity as a result of the Proposed Development



- 16.34 Six properties experience transgressions from the baseline BRE Guidelines which are fully detailed within Section 6 of Point 2's Daylight and Sunlight report as well as within the Daylight and Sunlight chapter of the Environmental Impact Assessment.
- 16.35 40-60 Hampstead Road would see transgressions to 9 windows for VSC and 11 rooms for NSL. 1-6 Tolmers Square would see transgressions to 4 windows for VSC.
- 16.36 Both properties have protruding balconies or deck access and therefore a 'without balconies' assessment was undertaken to determine whether the presence or overhang of the residential balconies is the main factor in the alternations as allowed for within the BRE Guidelines. The results for this alternative assessment show full compliance with the BRE Guidelines which demonstrates that it is the presence of the overhanging walkways/balconies that is the main factor in the relative alterations to daylight, rather than the Proposed Development.
- 16.37 In respect of 164-166 Drummond Street and 175 Drummond Street, the transgressions from the BRE Guidelines all relate to bedrooms which have a lesser requirement for daylight as referenced in the BRE guide (para 3.2.3) – "Kitchens and bedrooms are less important, although care should be taken not to block too much sun."
- 16.38 In respect of Schafer House, in total, 162 windows and 150 rooms were assessed. All of the 162 windows assessed adhere to the BRE guidelines for the VSC assessment. When considering the NSL assessment, 144 out of 150 rooms meet the baseline BRE Guide. Of the six rooms that transgress from the baseline guidance, five would see minor transgressions between 20%-30% and one room would see a transgression between 30- 40%.
- 16.39 Based on the floorplans obtained for this property, three of the rooms that transgress are known to serve bedrooms, which have a lesser requirement for daylight as previously noted. The three remaining rooms serve living room/kitchen dining or kitchen dining spaces, however the transgression within these rooms is 20.9% and 23% which is only just over the suggested threshold contained within the BRE Guidelines.
- 16.40 The Triton Building (20 Brock Street) is the nearest residential property, located immediately north of the site. The assessment reviewed 298 windows serving 140 habitable rooms. The assessment concludes that in respect of VSC daylight, 215 of 298 windows would meet the BRE Guidelines. Of the windows that transgress from the baseline BRE Guidelines, 68 would



- experience minor transgressions between 20-30% the former value (against a target of less than 20%), with the remaining 15 experiencing moderate transgressions of between 30-40%.
- 16.41 A 'without balcony' assessment was carried out due to the presence of projecting balconies. When considering the results for this alternative assessment, only two windows would experience a fractional transgression from the BRE Guide of less than 21%, and all other rooms would adhere to the baseline BRE Guideline. Both of these rooms that experience a fractional transgression are bedrooms which have a lesser requirement for daylight as previously noted. This demonstrates that it is predominantly the presence of the overhanging walkways/balconies that is the main factor in the relative alterations to daylight, rather than the Proposed Development.
- 16.42 For the NSL assessment in the alternate assessment, all of the rooms would meet guidance with the presence of balconies negated.
- 16.43 In respect of sunlight (APSH), all of the rooms assessed and detailed within the Daylight and Sunlight Report and the Daylight and Sunlight Chapter in the Environmental Statement would meet the BRE Guidelines and therefore would not see a noticeable alteration to their sunlight.
- 16.44 Point 2 have also carried out a Sun on Ground (overshadowing) assessment for the amenity areas serving 1-6 Tolmers Square, the Triton Building, George Mews and Regents Place Plaza. The results demonstrate that all surrounding amenity areas would remain fully compliant with the BRE Guidelines with the Proposed Development.
- 16.45 While the proposals would result in some isolated transgressions from the BRE Guidelines as noted within Point 2's reports, these are within the intended flexibility cited in the BRE Guidelines and for proposals within an urban context.
- 16.46 As a result, Point 2 do not consider that the Proposed Development would cause unacceptable harm to the surrounding neighbouring properties. The proposals therefore meet national, regional and local policy.

17 Other Considerations

17.1 This section assesses the development against other relevant material planning considerations. These are as follows:

- a. Flood Risk / Drainage / Sustainable Drainage System ('SuDS');
- b. Archaeology;
- c. Fire

Flood Risk / Drainage / SuDS

Planning Policy

- 17.2 The NPPF identifies that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Paragraph 169 of the NPPF specifies that major developments should incorporate sustainable drainage systems, unless there is clear evidence that this would not be appropriate.
- 17.3 Policies SI12 (Flood risk management) and SI13 (Sustainable drainage) of the London Plan include the requirement to follow a hierarchical approach to surface water management with a preference for green over grey features and advocate that drainage should be designed and implemented in ways that promote multiple benefits including increase water use efficiency, improve water quality, and enhance biodiversity, urban greening, amenity and recreation.
- 17.4 Policy CC2 (Adapting to climate change) of Camden's Local Plan advises that all development should adopt appropriate climate change adaption measures, including not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- 17.5 Policy CC3 (Water and flooding) of Camden's Local Plan seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible.
- 17.6 The Water and Flooding CPG (March 2019) states that the Council expects all developments, whether new or existing buildings, to be designed to be water efficient by minimising water use and maximising the re-use of water.

Assessment

- 17.7 A Flood Risk Assessment has been prepared by Arup. The report advises that the site is located within Flood Zone 1 and has a negligible risk of ground water and surface water flooding.
- 17.8 The Arup report concludes that the Proposed Development would not give rise to a flood risk elsewhere and the existing drainage network would be retained.
- 17.9 The proposal includes tanked permeable paving, planting and green roofs. In addition, significant upgrades to the hard and soft landscaping are proposed to Regent's Place Plaza including a series of shallow drains towards areas of urban wetland/planting to the west of the tower. The wetland has been designed as a Free Water Surface wetland. This wetland would use pumps and tanks stored within the basement to collect and feed stormwater within the system. The water would be gravity pulled through a series of vegetated beds. The last bed would feed into an attenuation tank.
- 17.10 The proposal includes a blue roof with storage at basement level, green roofs, and a water harvesting system used to flush WC's throughout the proposed tower. The surface water discharge rate would be limited to 3.0l/s and the site would attenuate 450m³.
- 17.11 It is therefore concluded that the proposal meets planning policy in respect of flood risk and drainage.

Archaeology

Planning Policy

- 17.12 At a national level, Paragraph 189-208 of the NPPF (2021) sets out guidance to conserve and enhance the historic environment.
- 17.13 Policy HC1 (Heritage conservation and growth) of the London Plan states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.
- 17.14 Policy D2 (Heritage) of Camden's Local Plan advises that the Council will protect the remains of archaeological importance by ensuring acceptable measures are taken proportionate to the

significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Assessment

- 17.15 An archaeological desk-based assessment has been prepared by MOLA. The report advises that an archaeological investigation was carried out in 2005. The report concludes that the site has no designated heritage assets on site and has a low to moderate potential for prehistoric remains and remains from all other periods.
- 17.16 The proposal meets the policy requirements in respect of archaeology.

Fire

Planning Policy

- 17.17 Part B of Policy D5 (Inclusive design) of the London Plan notes that developments should achieve the highest standards of accessible and inclusive design and incorporate safe and dignified emergency evacuation for all building users.
- 17.18 Policy D12 (Fire safety) of the London Plan illustrates the importance of fire safety and ensuring the safety of all building users meaning all development proposals must achieve the highest standards of fire safety. Developments should be constructed in an appropriate way to minimise the risk of fire spread, provide suitable means of evacuation and should develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in.
- 17.19 All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.
- 17.20 The supporting text (Paragraph 3.12.1) continues to state that the fire safety of developments should be considered from the outset. Development agreements, development briefs and procurement processes should be explicit about incorporating and requiring the highest standards of fire safety.
- 17.21 Policy D1 (Design) of Camden's Local Plan advises that LBC will require that development carefully integrates building services equipment, including fire escapes. The supporting text



(Paragraph 7.34) notes that this building services equipment should be located in a visually inconspicuous position.

- 17.22 The LPG Fire Safety (2022) states that major developments must demonstrate how fire safety has been considered from the earliest stages of development and the applicant must provide a Fire Statement detailing how it has been considered. Further, the SPG states that applicants must comply with London Plan Policies D12 and D5 (Part B).

Assessment

- 17.23 A Fire Statement has been prepared by Arup. The report advises that the design of the proposal would meet fire safety guidance BS9999:2017 – Code of practice for fire safety in the design, management, and use of buildings.
- 17.24 The proposal includes a full commercial automatic sprinkler system in accordance with BS EN 12845:2015 and A1 2019. Two fire escapes are proposed together with two central firefighting shafts, designed in accordance with BS EN 12101-6:2005. In addition, a number of passive fire protection measures are also proposed.
- 17.25 The proposal meets planning policies relating to fire safety.

18 Planning Obligations and Community Infrastructure Levy

18.1 On 6 April 2010 the Community Infrastructure Levy (CIL) Regulations 2010 came into force. The regulations require all planning obligations to be:

- i. necessary to make the development acceptable in planning terms;
- ii. directly related to the development; and
- iii. fairly and reasonably related in scale and kind to the development.

18.2 Paragraph 154 of the NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Paragraph 56 echoes the requirements set out in points i-iii above.

18.3 The supporting text of Policy C2 (Community facilities) of Camden's Local Plan (Paragraph 4.26) states that LBC will seek Section 106 planning obligations, where it is legitimate to do so, to ensure that the additional demand development places on existing community infrastructure and services is met.

18.4 The Proposed Development would give rise to a CIL payment, to help fund the provision of physical and social infrastructure in Camden.

18.5 Further guidance on planning obligations and CIL contributions is provided in Supplementary Planning Guidance (SPG) and Documents (SPDs) adopted by the Mayor of London and Council, respectively.

Community Infrastructure Levy

18.6 The planning permission is proposed to be a phased permission for the purposes of the Community Infrastructure Levy Regulations 2010. This means that CIL payments would be linked to the commencement of phases of the Development and payable in accordance with Camden's instalments policy thereafter. The Phasing Plans submitted as part of this application identify two main phases:

- Phase 1: Deconstruction of the existing Euston Tower

- Phase 2: Construction of the new Euston Tower and associated public realm and landscaping works

Developer Contributions

- 18.7 The Developer Contributions CPG (March 2019) sets out how LBC will use Section 106 Contributions and CIL to fund key infrastructure across the Borough. The guidance states that financial contributions will be sought in respect of affordable housing, open space and infrastructure to address the site specific and related impacts of development which may include financial, and non-financial contributions. Detailed guidance for calculating specific financial obligations is set out within the relevant CPGs.
- 18.8 As noted above, it is proposed that the Proposed Development would be phased. Discharge of planning conditions and obligations would be linked to the relevant phases (or sub-phases) of the Development as appropriate.

Draft Heads of Terms

- 18.9 It is envisaged that the following planning obligations would be secured via the Section 106 Agreement between Camden and the Applicant:
- Payment-in-Lieu to be directed towards the delivery of affordable housing by the Council on a Council owned site;
 - Pedestrian, Cycling and Environmental Contribution
 - Open Space Contribution
 - Car Free Development;
 - Affordable Lab Space Requirements;
 - Deconstruction Management Plan;
 - Construction Management Plan;
 - Deconstruction and Construction Management Plan Bond;
 - Construction Working Group;
 - Energy and Sustainability (including 'Be Seen' monitoring);
 - Highways Works
 - Local Employment requirements, including jobs for Camden residents, apprenticeships, and work experience placements.
 - Local Procurement;

- Blue Badge Parking Spaces;
- Delivery, Service and Waste Management Plan;
- Travel Plan;
- Operational Management Plan; and
- Neighbourhood Innovation Lab Management Plan.

19 Summary and Conclusions

- 19.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. This Planning Statement has assessed the Proposed Development against the development plan and other relevant planning policy and guidance at a national, regional, and local policy level.
- 19.2 The Proposed Development has been the subject of extensive consultation with local community and interest groups, and close consultation with planning, design, conservation, inclusive economy, sustainability, and transport officers at the London Borough of Camden as well as key stakeholders including the Greater London Authority, Transport for London and Historic England. The Applicant has always sought to consider and where possible respond to the responses received.
- 19.3 The Proposed Development has been designed by 3XN and DSDHA and comprises the deconstruction and partial retention of the existing Euston Tower to create commercial spaces specifically designed to cater for Knowledge Quarter uses, public uses for the local community to engage with the science, technology and innovation taking place within the building. All surrounded by high quality safe, inclusive and green public realm for the local community to enjoy.
- 19.4 The vision for the project is to create a world leading science, technology and innovation building and public realm for Camden and the Knowledge Quarter that inspires, connects, and creates opportunities for local people and businesses and in doing so:
- Transform the existing Euston Tower ensuring it is fit for the future by adopting cutting-edge sustainability targets and reusing, recycling, and offsetting, where necessary, to reach net zero at completion and in operation.
 - Put social impact at the heart of the project from the start and ensuring that communities play a key role in shaping new spaces which meet local needs.
 - Create pioneering workspaces in the KQ for businesses of all sizes to prosper, including flexible incubator and accelerator spaces, to support start-ups, scale-ups and knowledge sharing.



- Ensure that the future use of Euston Tower is built upon identified need and contributes to a thriving local, regional, and national economy for our ever-changing world.
- Reimagine the public spaces of Regent's Place Campus, creating safe, inclusive, connected, and sustainable spaces for Camden's communities.
- Contribute towards meeting Camden's housing needs.

19.5 The Proposed Development would make a significant contribution to the London Borough of Camden's ambitions for a successful Knowledge Quarter Innovation District which seeks to directly improve the lives of local communities in which the development sits economically, socially, and environmentally.

19.6 The Proposed Development has been designed to respond to Camden's ambitions for its borough as set out in the Local Plan, "We Make Camden" as well as the KQ2050.. In summary, the Proposed Development would deliver a substantial package of public benefits including:

Environmental

- Retention of 31% of the structure of the existing building, following a three-part feasibility study which has been independently reviewed by Camden's advisers;
- Targeting BREEAM "Outstanding" for office areas and BREEAM "Excellent" for retail areas;
- Net zero carbon in construction and operation;
- Incorporating pioneering circular economy principles, including opportunities for reuse, upcycling and recycling;
- Creating an adaptable and flexible building to meet the needs of modern and future occupiers;
- An all-electric heating and cooling energy strategy;



- An ambitious approach to greening and biodiversity, with a target of over 26% Biodiversity Net Gain and over 0.3 Urban Greening Factor score achieved through a comprehensive public realm and landscape strategy;
- Incorporating wind mitigation measures throughout the Proposed Development including grilles in the podium, setbacks at ground floor level, totems and landscaped features throughout the public realm to disperse wind and provide an improvement on the current microclimate conditions;
- Provision of leading cycle and runner commuter facilities to encourage sustainable, active travel options to contribute to both the health and wellbeing of the wider area and users of the building.

Social

- Reimagining the public spaces around Euston Tower, creating safe, inclusive, green connected and sustainable spaces for Camden's communities to visit, rest, learn and play;
- The inclusion of three floors of publicly accessible space, anchored in the innovative concept of a Neighbourhood Innovation Lab. The spaces within the podium have been designed to be flexible, to enable the existing social value infrastructure, programmes and activities to grow and engage the local community at all stages of their lives;
- Designing the uses within the base of the tower to flow seamlessly with the new green and inclusive public realm around the development bringing communities together, to provide a safe space to meet and collaborate with others;
- Housing to be delivered through a Payment in Lieu, to be directed towards the delivery of affordable housing by the Council on a Council owned site, to be secured via Section 106 legal agreement.

Economic

- Approximately 1,055 FTE new jobs created during the construction period;



- Construction jobs first targeted at LBC residents via the Kings Cross Construction Skills Centre and others working alongside the LBC Inclusive Economy team;
- The workers at the proposed development would uplift the economic output (GVA) of the site by £386m-£462m per year;
- Provision of work placements and apprenticeships during the construction period and development of an Employment and Skills Plan (construction and end use) with targets for apprentices and work placements post-completion;
- The Proposed Development would anchor the western end of the Knowledge Quarter, through providing high quality work and life science space, with 3,605-4,375 jobs supported at the Proposed Development (equivalent to 8-10% of LBC's projected employment growth over the next decade) once operational;
- A proposed Neighbourhood Innovation Lab, fully accessible to the public, providing spaces for exhibitions, spaces to meet and collaborate, encouraging the local community into the science, technology and innovation sector;
- A fully fitted out 'accelerator' lab-enabled space to provide an affordable workspace for small and start-up and scale up businesses looking to grow in the life science sector. Through removing lab fit-out costs and upfront capital expenditure for growing businesses, it allows available resources to be focused on research and development; and
- Requirement to ensure all employees, contractors' employees and sub-contractors' employees on site in connection with deconstruction and construction are paid at a rate not less than the London Living Wage.

19.7 The Proposed Development meets planning policies at a national, regional, and local level and therefore should be approved.

Appendix A – Full Site Planning History

Reference No.	Date Registered	Type of Application	Description	Decision
2023/3265/P	08/08/2023	Request for Scoping Opinion	Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for Proposed Development involving the partial demolition of the existing building (retention of central core, basement and foundations) and erection of a 32-storey building (mixed use including office floorspace, lab-enabled floorspace and flexible retail floorspace), alterations to existing basement, improvements to public realm surrounding the building.	n/a
2022/3516/A	11/10/2022	Advertisement Consent	Display of full height vinyl graphics to shopfront glazing on Hampstead Road and Brock Street elevations.	Withdrawn
2021/2982/P	23/07/2021	Full Planning Permission	Installation of replacement glazed sliding doors on shopfront.	Approved with conditions. (12/10/2021)
2021/3996/A	24/09/2021	Advertisement Consent	Display of 2x internally illuminated fascia signs and 2x internally illuminated projecting signs.	Approved (14/10/2021)
2015/1000/A	23/02/2015	Advertisement Consent	Display of 2x non-illuminated fascia and projecting signs on elevations facing Brook Street and Regents Place.	Approved. (04/03/2015)
2015/2632/NEW	01/05/2015	Advertisement Consent	3 x internally illuminated fascia signs to replace the 3 signs currently in situ.	Withdrawn
2015/3244/A	10/06/2015	Advertisement Consent	Installation of 3 x internally illuminated fascia signs on front elevation of existing shop	Approved. (23/06/2015)



2014/6011/A	26/09/2014	Advertisement Consent	Display of 2 x non-illuminated fascia signs and 2 x non-illuminated projecting signs on the west and south elevations of the existing shopfront.	Approved (17/10/2014)
2014/7454/P	10/12/2014	Full Planning Permission	Installation of a fire exit door on the ground floor northern side elevation of the existing retail unit (A1 use) (retrospective)	Approved with conditions. (03/06/2015)
2013/0665/NEW	04/02/2013	Advertisement Consent	Display of halo illuminated fascia sign to existing shop.	Withdrawn
2013/1104/P	13/03/2013	Approval of variation of Conditions	Details pursuant to discharge part of condition 8 (proposed shopfronts) of planning permission dated 25/03/2009 (Ref: 2007/0823/P) for redevelopment of site.	Approved (24/04/2013)
2013/6669/P	23/10/2013	Full Planning Permission	Division of the existing retail unit to the northern side of the ground floor into 2 x retail units and associated alterations to shopfront including alterations to the doors and louvres and removal of ATM machine.	Approved with conditions (28/11/2013)
2011/2971/A	27/06/2011	Advertisement Consent	Display of 2 x non-illuminated signage to front elevation of Sainsbury's shop (Class A1).	Approved (06/07/2011)
2010/3271/P	25/06/2010	GPDO Prior Approval Determination	Installation of a public payphone adjacent to Euston Tower, Hampstead Road.	Prior Approval Required – Approval Refused (06/08/2010) Appeal Dismissed (24/03/2011)
2008/0060/P	10/01/2008	Full Planning Permission	Overcladding of existing spandrel panels with new aluminium panels to all elevations of offices (Class B1).	Approved with conditions. (26/02/2008)
2008/0412/P	04/02/2008	Full Planning Permission	Retention of an air conditioning unit on the second-floor west spur.	Approved (27/03/2008)



2007/4710/P	14/11/2007	Full Planning Permission	Installation of 4 air conditioning units on second floor level flat roofs (2 on each roof) in connection with existing offices (Class B1).	Approved with conditions. (02/01/2008)
2003/2285/P	07/10/2003	Full Planning Permission	Replacement of the existing mast & associated equipment with a 25m high guyed lattice mast and associated works.	Approved with conditions. (06/11/2003)
PSX0104900	02/08/2001	Full Planning Permission	The installation of a new shop front.	Withdrawn (06/10/2001)
PS9904228	18/04/1999	Full Planning Permission	Installation of a standby generator at roof level, as shown on drawing numbers ET2, ET3, and 0698/E02A.	Approved (27/05/1999)

Appendix B – Glossary of Terms

- AQMA - Air Quality Management Area
- AOD – Above Ordnance Datum
- BNG – Biodiversity Net Gain
- BRE – Building Research Establishment
- BREEAM – Building Research Establishment Assessment Method
- CA – Conservation Area
- CAZ – Central Activities Zone
- CFD - Computational Fluid Dynamics
- CIL – Community Infrastructure Levy
- CLA - Central London Area
- COIL - Certificate of Immunity from Listing
- CPG – Camden Planning Guidance
- DCLG - Department of Communities and Local Government
- DRP - Design Review Panel
- DMF - Development Management Forum
- DMR - Dry Mixed-Recycling
- EIA - Environmental Impact Assessment
- F&B - Food and Beverage
- GLA - Greater London Authority
- HE - Historic England
- HVM - Hostile Vehicle Mitigation
- KQ – Knowledge Quarter
- KQID - Knowledge Quarter Innovation District
- LBC – London Borough of Camden
- LP - London Plan
- LPG - London Plan Guidance
- LURA - Levelling Up and Regeneration Act
- LVMF - London View Management Framework
- MCIL – Mayoral Community Infrastructure Levy
- NIL - Neighbourhood Innovation Lab
- NSL - No Skyline
- NPPF – National Planning Policy Framework

- PTAL - Public Transport Accessibility Levels
- R&D - Research and Development
- SCI - Statement of Community Involvement
- SPD – Supplementary Planning Document
- SPG – Supplementary Planning Guidance
- SuDS - Sustainable Drainage System
- TfL - Transport for London
- TVBHIA - Townscape, Visual and Built Heritage Impact Assessment
- UGF - Urban Greening Factor
- VST - Vertical Sky Component
- VT - Vertical Transportation