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FAO: David Peres Da Costa
Camden Council
Planning - Development Control
Camden Town Hall
London
WC1H 8ND

Dear Mr Peres Da Costa,

1 TRITON SQUARE, NW1 3AN
APPLICATION FOR FULL PLANNING PERMISSION

DP9 Ltd has been instructed to submit an application for full planning permission on behalf of British Land Property Management (hereafter referred to as the 'Applicant') for the re-positioning of 1 Triton Square (The Site) for life science and innovation uses. This application relates to the physical changes necessary for the building.

Site and Surrounding Area

The Site is 1.03 ha in size and falls within the 13-acre Regent's Place campus, south west of the London Borough of Camden ('LBC'). The campus is located immediately to the north of Euston Road, between Great Portland Street and Warren Street Stations, and in close proximity to Regent's Park and Euston.

Regent's Place is located within Camden's thriving Knowledge Quarter, home to a variety of key stakeholders in London's knowledge economy and creative sector.

The Site benefits from the highest Public Transport Accessibility Level (PTAL) rating of 6b, largely attributed to its close proximity to Regent's Park, Great Portland Street, Warren Street, Euston and Euston Square Underground Stations. A range of underground lines are accessible within 150m of the Site such as the Circle, Hammersmith & City, Metropolitan, Northern and Victoria Lines. Regent's Place possesses a strong connection with the London Road Network, allowing travel across the city via the M40 and A40. There are numerous bus stops surrounding the Site providing a range of different services across London.

1 Triton Square is neighboured by 10 Brock Street to the east, 2 Triton Square to the south and the estate substation, Diorama Theatre and 1 Osnaburgh Street to the west. The building's north elevation faces onto Longford Place. There is an existing ramp on the western side of the building to access the basement of the campus.

Existing Building

1 Triton Square was originally built in 1998 as a dedicated office building for The First National Bank of Chicago.

In 2018-2021, a major refurbishment and redevelopment took place (Ref: 2016/6069/P) and three additional levels of office accommodation were added to the building. It has a building height of 42.3m, with external plant equipment at roof level.

The original concrete frame with steel stability cores at each corner were strengthened as part of the 2021 redevelopment, with a partially in-filled atrium and three floors added in steel construction.

The building services systems were also completely renewed and the building was completed to a shell and core standard with the exception of the lift lobbies and toilets which have been fully fitted out.

Planning History

A review of the London Borough of Camden's ('LBC') Planning Register has found the following applications of relevance.

Outline planning permission was granted at Appeal (Ref: R/T/APP/X5210/A/90/163148/PS) in November 1990 for the redevelopment of the site by the erection of an office building including a design centre, studios, a sports unit and underground parking. This Major application established the large building on site, amounting to approximately 26,950 sqm of mixed-use offices.

Following this overarching Planning Permission, various reserved matters and conditional applications have been granted in relation to the Appeal Decision. Of relevance to this proposal being an application (ref: 2005/1360/P) for the erection of additional roof plant and visual acoustic screens on the rooftop, granted 5 May 2005.

A Certificate of Lawfulness (Proposed) application (ref: 2015/5247/P) for Infill part of internal atrium at second, third, fourth and fifth floor levels to create additional office floor space which was granted 3 November 2015.

British Land then submitted an application (ref: 2016/6069/P) that was granted 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.*

In summary, the site has a complex planning history with the current uses confirmed as majority office (B1) as well as a retail and leisure element (A1, A3, A4 and D2). The building now sits vacant, save for the affordable workspace and gym which are currently being fitted out, and as such presents British Land with the opportunity to reposition the Site for life science uses in accordance with LBC's ambitions for the knowledge quarter.

Pre-application Discussions

On 18 December a pre-application meeting was held with LBC, principally regarding the erection of the flues, additional roof plant, ventilation and gas storage containers. The advice received in this meeting has informed the planning submission.

Proposed Development

The principal change to the development involves the erection of two Laboratory flues at roof level. The flues house two strobic fans which expel air from the wet laboratories and as such are imperative in the functioning of the space. The flues will be located on the western brown roof and are approximately 4.3m high with widest diameter of approximately 1.6m. The fume exhaust fans will be visible, but will have no impact on the LVMF.

The AHU's require new intake and extract louvres that will be incorporated into the existing inner façade of the double skin and new open metal mesh areas will be incorporated into the end doors of the double skin. These new louvres, located across levels 2-5, direct air towards the end wall mesh screens using vertically orientated blades.

Cryogenic sample storage and LN2 tank rooms are proposed at ground floor level. In response, the glazed sliding doors, previously providing an entrance to one of the cycle stores, are to be replaced with a louvred façade. This façade will match the louvred bay that already exists on the north elevation. The louvred façade needs to incorporate a single fire escape door which is to be blanked off and insulated as well as a double door to the cryogenic store. The two existing cycle stores will be combined with the remaining access retained and no overall loss of spaces.

The proposed uses require a new louvred area for the ventilation of the gas riser at level 7. These louvres will be one floor in height and will replace two columns of stone. The louvres will be set back from the main façade at levels 2-5 so that they will not be visible from ground floor. This louvred area has been sensitively designed with PPC aluminium to match the existing louvres elsewhere on the building.

A laboratory gas bottle storage unit will be located externally on the west side of the building in the walkway adjacent to the planter. This walkway will be gated and public access restricted. The Sheffield stands are to be removed and relocated within the campus.

A Design and Access Statement has been submitted alongside this cover letter which provides additional details and specification in relation to the proposed development summarised above.

Planning Policy Framework

The Development Plan for LBC comprises the following:

- London Plan (2021);
- Camden Local Plan (2017); and
- Camden Draft New Local Plan (Reg 18, January 2024).

The following national planning policy guidance and guidance documents are material considerations in the determination of the Application:

- National Planning Policy Framework (NPPF); and
- Planning Practice Guidance (PPG).

Site Designations

- Central Activities Zone (CAZ);
- Eastern Side of site within the London View Management Framework (LVMF); and
- Euston Area Plan.

Planning Policy Assessment

This section will assess the key issues with the principal of the development and design elements of the proposals against the Development Plan.

Policy

Knowledge Quarter

The Knowledge Quarter, centred around King's Cross and Euston has expanded considerably since the Local Plan was Adopted in 2017, and has developed into a key strategic asset for LBC. The 'Knowledge Quarter and Science Growth Sector' was identified as a key growth sector in the Adopted Local Plan, highlighting the importance of geographical proximity and concentration as a catalyst for collaborative-based working. The Adopted Local Plan states:

> *"In order for these institutions and enterprises to meet changing standards and requirements and sustain their leading edge, there is often an ongoing need to update and modernise facilities."*

Camden are committed to attracting investment into the district. The Draft Local Plan (Reg 18).

Paragraph 3.6 states:

"Since the last Local Plan was adopted in 2017, the 'Knowledge Quarter' has expanded and consolidated its reputation as an internationally significant innovation district, harnessing

collaboration between private sector companies, universities, hospitals and research establishments in fields such as medical and life sciences, data analytics and machine learning. The KQ has the potential to lead the way in inclusive innovation, and become the best place in Europe for collaboration, innovation and research."

Draft Policy S1 Part I goes on to state that "the CAZ and Knowledge Quarter centred on King's Cross and Euston will continue to be the main focus for employment development in Camden."

The Regent's Place Campus is perfectly located to ensure increased investment into the Knowledge Quarter, supporting the strategic aims of LBC.

Townscape, Heritage and Design

The NPPF establishes national level policy on the conservation and preservation of the historic environment. The NPPF also establishes national policies on achieving well designed places, affording great value to the importance of high-quality and sustainable design. Therefore all proposals must seek to meet the aims of the NPPF in terms of long lasting design quality with a good relation to the context of the area.

London Plan strategic objective GG2 highlights that to create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must apply a design–led approach to determine the optimum development capacity of sites. Policy D3 follows this point further and suggests that all development must be optimised to fit the best possible site capacity through a design-led approach.

Local Plan Policy D1 further emphasises the need for developments to follow a sustainable approach to design that respects the local context and character.

The proposed development has been designed in accordance with the Development Plan, demonstrating a sensitive approach for the replacement of louvres, ensuring they minimise impacts on both the local area and the rest of the building. The location of the flues changed during the pre-application process, moving them to the western side of the roof, minimising impacts on local views and townscape (see Design and Access Statement for further details). A TVIA has been produced (and included in the DAS) demonstrating that the impact of the flues would be negligible, and the nature of their effect would be neutral as they wouldn't alter the character, quality and composition of the view.

Noise and Vibration

The London Plan Policy D14 sets out the requirements for noise sensitive development ensuring proposals mitigate and minimise the existing and potential adverse impacts of noise. Camden's Local Plan Policy A4 details out the borough's noise and vibration thresholds, demonstrating the requirements for plant and machinery, ensuring its operation without harm to amenity.

In response to regional and local policy, Arup were appointed to produce an acoustic report demonstrating the measures put in place to mitigate noise and vibration impacts. The report assesses the noise and vibration for the building as a whole, updating the previously submitted noise report for the refurbishment and extension application (ref: 2016/6069/P) and the impact of the flues. Mitigation will be provided, in accordance with LBC Policy A4, via specialist attenuators for fume extract fans, attenuation packages for ASHPs and ducted attenuators for on floor AHUs (Levels 2 to 5).

These measures ensure plant noise emissions associated with the new external plant and machinery works are designed to meet the planning noise emission limits set by LBC.

Air Quality

Paragraphs 105, 180 and 192 of the NPPF demonstrate the importance of air quality in the local plan making process, ensuring that where possible policy should encourage sustainable development and mitigation measures in relation to air quality.

The London Plan Policy SI1 is consistent with the NPPF, requiring new development to be air quality neutral and for major development to provide an air quality assessment. In supporting the London Plan's goal of creating a healthy city, Policy GG3 seeks to improve London's air quality and reduce the exposure to air pollution across the city.

Camden's Local Plan Policy A1 supports development unless it causes unacceptable harm to amenity via odour, fumes and dust. Local Plan Policy CC4 ensures both the exposure of occupants to air pollution and the effect of the development on air quality are considered.

The strobic fans associated with the life science uses have been assessed in relation to the proposal. At the time of preparing the reports, the exact emissions from the laboratories are unknown therefore the Air Quality Assessment has considered the most commonly used solvents in laboratories as a basis for the assessment. Dispersion modelling has been undertaken to determine the controlled emission rates of the strobic fans, ensuring that the risk of exceeding the EAL would be negligible. Furthermore, maximum predicted process contributions for annual, daily and 30-minute means across the assessed receptors are also considered negligible and not significant at all human receptor locations.

In addition, Appendix B considers maximum allowable emission rates for additional pollutants defined by the Environment Agency, including those with more stringent environmental standards if these are to be used.

Therefore it is considered that the proposal is in accordance with Local and London Plan Policy, ensuring that the air quality impacts from the strobic fans are negligible. It is considered that if the intended uses of the laboratories involves emissions with more stringent limits, these will need to be considered as set out in Appendix B.

Submission Documents

Please find enclosed herewith the following plans and documentation, which in addition to this letter, comprise the application:

- Planning Application Form and Ownership Certificates, prepared by DP9;
- Existing and proposed elevations, prepared by Arup;
- Existing and proposed floor plans, prepared by Arup;
- Site Location Plan, prepared by Arup;
- Design and Access Statement, prepared by Arup;
- Noise Report, Prepared by Arup;
- Air Quality Report, Prepared by Arup; and
- CIL additional information Form, prepared by DP9.

The application has been submitted via the Planning Portal, together with the requisite application fee of £6,928.00.

We look forward to receiving confirmation of receipt and registration of the enclosed application in due course. Should you have any queries or require any further information, please do not hesitate to contact Tom Horne or Oscar Mansfield Jones of this office.

Yours faithfully

DP9 Ltd

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