

# Euston Tower, 286 Euston Road

Local Planning Authority: Camden  
Local Planning Authority reference: 2023/5240/P

## Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

## The proposal

Redevelopment of Euston Tower comprising construction of a new building incorporating retained elements of the existing building to provide a 32-storey mixed-use building comprising; office, research and development floorspace, retail, café/restaurant, learning and community spaces.

## The applicant

The applicant is **British Land Property Management Ltd** and the architects are **3XN**.

## Strategic issues summary

**Land use principles:** The principle of the commercial-led, mixed-use development including office, laboratory enabled floorspace and community spaces accords with the vision of the Knowledge Quarter, and the Euston Opportunity Area, as set out in the London Plan, Euston Area Plan and Camden's Draft Site Allocations Plan.

**Urban design and heritage:** The inclusion of a tall building in this location is acceptable in principle, noting the existing tall building on the site. Further refinement is required in respect of the architecture and material palette of the building, particularly when considering its impact in longer views. Less than substantial harm has been identified to a number of heritage assets, including the BT Tower and Fitzroy Square Conservation Area. Subject to agreeing and securing the public benefits, the less than substantial harm identified above would be outweighed by the public benefits of the scheme. An update will be provided at Stage II decision making stage.

**Circular economy:** Extensive investigation has been undertaken with respect to options for in-situ retention, which is supported in line with the London Plan's Circular Economy hierarchy. Notwithstanding, further technical information is required to ensure full compliance with Policy SI 7 of the London Plan.

**Transport:** Further information is required to confirm impact of the proposals on public transport and in respect of the Active Travel Zone Assessment. A contribution of £1.2 million towards the Euston Circus Healthy Streets scheme is required, including the design and delivery of the floating bus stop/cycle layby, and £200,000 is required towards a new Cycle Hire docking station within the site. Conditions are required to mitigate transport impacts during construction and operation.

Other issues on **energy, sustainable drainage, air quality** and **green infrastructure** also require resolution prior to the Mayor's decision making stage.

## Recommendation

That Camden Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 152. Possible remedies set out in this report could address these deficiencies.

## Context

1. On 15 February 2024 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following categories of the Schedule to the Order 2008:
  - Category 1B(1b) – “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres”
  - Category 1C(1c) - “Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London”.
3. Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

## Site description

6. The 0.879-hectare site is occupied by an existing 1970s office block, Euston Tower, and forms part of 'Regent's Place Campus', a 13-acre site providing office, workspaces and commercial land uses, owned and managed by British Land. The Euston Tower office block has been vacant since 2021.
7. Euston Tower is bordered by Euston Road to the south and Hampstead Road to the east. Euston Road and Hampstead Road both form part of the Transport for London Road Network (TLRN). The site sits south of Drummond Road, and existing buildings that form part of Regent's Place Campus' border the site to north and west. Tottenham Court Road is also located approximately 60 metres south of the site and forms part of the Strategic Road Network (SRN).

8. The existing building provides 54,826 sq.m. of floorspace comprised of 52,477 sq.m. of commercial office space (Class E(g)), an office lobby 1,294 sq.m. in size and 1,055 sq.m. of retail (Class E) floorspace.
9. The site is located within the Central London boundary in land designated by the London Plan as part of the Central Activities Zone (CAZ). The London Plan, Euston Area Plan and draft Euston Area Plan identify the site as within the Euston Opportunity Area. The site is also located within the Knowledge Quarter Innovation District, as identified by Camden's Draft Site Allocations Plan (2019).
10. The site is also located in the Air Quality Focus Area (Marylebone Road from Marble Arch/Euston/King's Cross Junction).
11. The site is in proximity to the Westminster World Heritage Site and associated listed buildings, as well as in proximity to a number of other designated heritage assets, including (but not limited to): the Grade I listed Regents Park Registered Park and Conservation Area; the Grade II listed BT Communication Tower, Grade II listed Numbers 56 to 68 (consecutive) Warren Street; Grade II listed Numbers 168 and 170, 184 to 188, 185 to 191, 190 to 198, 211 to 229 North Gower Street and Grade II listed Numbers 50 and 52 and the Lord Nelson Public House, Stanhope Street. The site is also in proximity to Camden Square, Fitzroy Square, Bloomsbury and Harley Street Conservation Areas, located to the north, south, southeast and southwest, respectively.
12. The site is located partially within the protected viewing corridor for the Parliament Hill summit to the Palace of Westminster (Viewing Location 2A). The site is located to the west of the protected viewing corridor Parliament Hill oak tree to Palace of Westminster (Viewing Location 2B). The existing Euston Tower is also visible from other strategic views including Primrose Hill: the summit (Viewing Location 4a), and there is also limited visibility of the very top of the existing Euston Tower between the two Assessment Points from the Lambeth Bridge River Prospect (Viewing Location 19A).
13. The site's Public Transport Accessibility Level (PTAL) is 6b representing an excellent level of access to public transport. The nearest London Underground stations are Warren Street, Euston Square, Great Portland Street and Regent Park Stations location 100 metres south, 230 metres east, 340 metres west of the site, Regents Park 570 metres west of the site. Together these stations provide London Underground (LU) services for Northern Line, Victoria Line, Metropolitan Line, Hammersmith and City lines, Circle line, Bakerloo line. Euston Station is located approximately 500 metres northeast of the site, also providing National Rail and Overground train services. The nearest bus stops to the site are located along Euston Road, Hampstead Road and Tottenham Court Road providing service for nine bus routes.

## **Details of this proposal**

14. The proposal is for the redevelopment of Euston Tower comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide

a 32-storey mixed-use building providing 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; public realm enhancements, including new landscaping and provision of new publicly accessible steps and ramp; short and long stay cycle storage; servicing; refuse storage; plant and other ancillary and associated work.

## **Case history**

15. The proposal relevant to this report has been the subject of three pre-application meetings between the applicant, GLA Officers and Camden Council officers. Specifically, pre-application meetings were held in-person and over Microsoft Teams on the 15 June 2023, 10 August 2023 and 20 September 2023. The GLA meetings covered a wide range of strategic planning issues including the principle of demolition, land uses, delivering affordable housing, urban design, London View Management Framework, heritage, sustainable development (including circular economy, whole life cycle carbon and energy) and environmental issues (including green infrastructure, flood risk management, sustainable drainage, water efficiency and air quality). Two written notes were issued following the meetings (dated 20 October 2023 and 25 October 2023 see GLA Refs: 2023/0283/P2I & 2023/0501/P2F, and 2023/0571/P2F).

## **Strategic planning issues and relevant policies and guidance**

16. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Camden Local Plan 2017 and, the London Plan 2021.
17. The following are also relevant material considerations:
  - The National Planning Policy Framework and National Planning Practice Guidance;
  - Draft Camden Regulation 18 Plan; Draft New Camden Local Plan, Regulation 18 Consultation Version (January 2024).
  - Euston Area Plan (2015);
  - Euston Area Plan (Draft 2023); and
  - Draft Site Allocations Plan (2019).
18. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
  - Good Growth - London Plan;

- World City role - London Plan;
- Economic development - London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;
- Central Activities Zone and Opportunity Area - London Plan;
- Regeneration Area - London Plan; the Mayor's Economic Development Strategy;
- Retail / office - London Plan;
- Education facilities and social infrastructure - London Plan; Social Infrastructure SPG;
- Culture - London Plan; Mayor's Cultural Strategy;
- Urban design - London Plan; Public London Charter LPG; Optimising Site Capacity: A Design-Led Approach LPG;
- Fire Safety – London Plan; Fire Safety draft LPG;
- Strategic views - London Plan, London View Management Framework SPG;
- Heritage - London Plan; World Heritage Sites SPG;
- Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG
- Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; Mayor's Environment Strategy;
- Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality positive LPG; Air quality neutral LPG;
- Transport and parking - London Plan; the Mayor's Transport Strategy;
- Equality - London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;
- Green Infrastructure - London Plan; the Mayor's Environment Strategy; All Urban Greening Factor LPG

## Land use principles

### Central Activities Zone, Euston Opportunity Area and Knowledge Quarter Innovation District

19. The site is located within the Central Activities Zone (CAZ). London Plan Policies SD4 and SD5 support mixed-use development which will enhance and promote the unique international, national and London wide roles of the CAZ. Policy SD4, Part G, specifically identifies the CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities, and states that other more local Special Policy Areas should be supported and promoted.
20. The site falls within the Euston Opportunity Area, which is identified in the London Plan as having an indicative capacity of 8,600- 15,000 new jobs and 2,800-3,800 new homes. The adopted Euston Area Plan sets out that the area should deliver overall between 180,000 sq.m. and approximately 280,000 sq.m. of new employment/economic floorspace, providing between 7,700 and approximately 14,100 jobs, encouraging knowledge based, research and creative uses to strengthen Euston's existing role as a knowledge and research hub.
21. As noted above, the site is also located within the Knowledge Quarter Innovation District, as identified by Camden's Draft Site Allocations Plan (2019). Policy E1 of Camden's Local Plan, and Policy KQ1, as included within the Knowledge Quarter chapter of the Draft Site Allocations Plan (2019), provide support for a world-class knowledge hub which reflects current and emerging needs of the knowledge economy and which provides a mix of flexible and adaptable workplaces including affordable floorspace.
22. The proposed development provides 77,542 sq.m. of non-residential floorspace comprised of 46,464 sq.m. of office floorspace, 21,603 sq.m. of lab enabled floorspace, 2,893 sq.m. of accelerator lab workspace, and a lobby 3,830 sq.m. in size (all Class E(g)). 748 sq.m. of retail (Class E) floorspace is also provided, as well as 2,003 of Class E/F floorspace. The proposed development would deliver re-provision and uplift equivalent to 22,716 sq.m. of CAZ land uses.

### Office land use

23. Policies SD4 and E1 of the London Plan recognise the established long-term demand for office space in the CAZ, and strongly promote office provision within the CAZ to meet this demand and support London's continuing function as a World City. Policy E1 of the London Plan sets out that the unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZ, should be developed and promoted. Over the 2016 – 2041 plan period, demand for office floorspace within the CAZ is expected to rise by 59%.
24. Part F of Policy SD4 sets out that in areas where offices and other CAZ strategic functions are given greater or equal weight relative to new residential

development (as defined in Part C of the policy), mixed-use office/residential proposals should be supported where there is an equivalent or net increase in office floorspace. Part G of Policy SD4 sets out that residential or mixed-use development proposals should not lead to a net loss of office floorspace in any part of the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices.

25. While it is noted that the proposal results in a decrease in the provision of conventional office floorspace (a decrease of 6,013 sq.m., down from 52,477 sq.m. as existing to 46,464 sq.m.), it is noted the proposal includes a variety of other Class E(g) land uses, including 21,603 sq.m. of lab enabled floorspace and 2,893 sq.m. of accelerator lab workspace, creating an overall increase of 22,716 sq.m. sq.m. in CAZ floorspace which would reflect the emerging needs of the knowledge economy in this location. This provision, which would be of an increased quality than the existing provision, would contribute to the demand for office and other strategic functions of the CAZ recognised within the London Plan, as well as the success and development of the CAZ and the Euston Opportunity Area. As such, the proposed office provision is acceptable.

#### Retail

26. The principle of the inclusion of retail land uses within the ground level of the scheme, which provide activation and vitality in this CAZ location, and provide retail facilities for people to enjoy and benefit from are supported.

#### Community land use

27. Policy SD1 of the London Plan sets out that Boroughs, through Development Plans and decisions, should support development which creates employment opportunities for Londoners as well as plan for and provide the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities.
28. Policy S1 of the Mayor's London Plan sets out that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported, and that development proposals that seek to make best use of land should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.
29. The application details that the lower three floors of the proposed building (proposed ground, first and second floors) have been designed to be fully accessible in the form of a Neighbourhood Innovation Lab ('NIL'). The NIL is proposed to address the specific context of Euston Tower, including community needs and interests, and local existing organisations and initiatives. The application states 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. The application details that a central

ambition is for Euston Tower to provide opportunities for people at different stages of their lives, with the NIL proposed to connect people to opportunity, whether that's through play and inspiration or learning and skills.

30. The principle of the inclusion of the provision of social infrastructure within the scheme is strongly supported.
31. The maintenance and management strategies for all the proposed facilities must be secured by the Council, to ensure the safety and security of visitors to the site, the quality of the floorspace is maintained for the lifetime of the development, access and costs to use the facilities is fair and not prohibitive to a range of users, and to facilitate the sharing of facilities for different community uses, in accordance with Policy S1 of the London Plan.

#### Land use principles conclusion

32. The principle of the inclusion of commercial-led, mixed-use development including laboratory enabled floorspace, office, retail and community spaces, aligns with the vision of the Knowledge Quarter, and the Euston Opportunity Area, as set out in the London Plan, Euston Area Plan and Camden's Draft Site Allocations Plan. Overall, the proposed land uses strategically align with the Opportunity Area, Knowledge Quarter and CAZ designations of the site, and the proposal is supported in principle by Objectives GG2 and GG5 of the London Plan, and Policies SD1, SD4, SD5, and E1 of the London Plan.

#### **Affordable workspace**

33. London Plan Policy E1(G) sets out that development proposals related to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace. Policy E3 of the London Plan supports the provision of affordable workspace and the use of planning obligations to secure it at rents maintained below the market rate for a specific social, cultural or economic development purpose. Policy E2(F) of Camden's Local Plan sets out that higher intensity redevelopment of sites that are considered suitable for continued business will be considered provided that (amongst other requirements) the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable. Policy KQ1 of the Draft Site Allocations Plan (2019) requires that major proposals for additional employment, research and/or learning floorspace within the Knowledge Quarter must ensure that at least 20% of additional employment floorspace is affordable workspace.
34. The planning application details that 2,670sq.m. of lab-enabled Accelerator Space is proposed within the third floor of the development, which is envisaged to 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 sq.m., 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.

35. The application details that 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, noting that a challenge for early-stage businesses is finding, securing, and then fitting out premises (which can be a significant distraction taking time and resource away from research and development). The application states that this space would be made available on highly flexible terms.
36. The affordable workspace provision should be considered by Council Officers and secured by planning obligation within a S106 agreement. In line Policy E3(D) obligations within a S106 agreement should be secured to ensure the economic development envisioned by the affordable workspace provision is monitored and achieves a long-term economic impact. Management of the affordable workspace provision should also be secured by planning obligation.

### **Contribution towards delivering affordable housing**

37. The London Plan seeks to maximise the delivery of affordable housing. Camden Local Plan Policy H2 promotes the provision of residential development in mixed use schemes where non-residential land uses are proposed. In the Central London Area, where development involves additional floorspace (GIA of 200 sq.m. plus), the Council seeks 50% of all additional floorspace to be self-contained housing. Where the Council is satisfied that providing on-site housing is not practical, the Council will in exceptional circumstances seek a payment in lieu.
38. The planning application details that these policy requirements were discussed and agreed with LBC officers prior to submission of the application that the 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. The application sets out that 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. Noting that discussions between the applicant and Council are ongoing in respect of addressing this local plan requirement, an update should be provided to GLA Officers in respect of this element of the scheme, prior to Stage 2.

## Urban design

### Tall buildings, scale and massing

39. London Plan Policy D9 states that based on local context, Development Plans should define what is considered a tall building for specific localities. It goes on to state that Boroughs should determine if there are locations where tall buildings may be an appropriate form of development. It also states that tall buildings should only be developed in locations that are identified as suitable in Development Plans. Policy D9 then goes on to identify the requirements for tall buildings to address visual impacts, including at different distances; aiding legibility and wayfinding; having exemplary architecture and materials; avoiding harm to heritage assets; not causing adverse glare; and minimising light pollution. Functional impacts that should be considered are the internal and external design; servicing; entrance capacity; area and transport capacity; maximise benefits to the area; and not interfere with communications. Environmental impacts that should be considered are wind, daylight, sunlight, and temperature; air movement (dispersal of pollutants); and noise creation. Cumulative impacts should also be considered.
40. The existing Euston Tower is 152.380 metres AOD in height and the proposed development is 153.300 metres AOD in height.
41. Policy D1 of Camden local plan sets out that all of Camden is considered sensitive to the development of tall buildings, and that tall buildings in Camden will be assessed against the design criteria set out in the policy. The supporting text to this policy states at paragraph 7.35 establishes that tall buildings are those which are “substantially taller than their neighbours or which significantly change the skyline”. The proposed building is considered substantially taller than the surrounding buildings, and therefore meets this definition of tall buildings.
42. The Local Plan does not identify specific sites for future tall buildings, and on this basis therefore cannot accord with the locational requirement for tall buildings set out in Policy D9 Part B of the London Plan.
43. A tall building currently exists on site, and this is a material planning consideration in the assessment of the proposal for a tall building on this site.
44. An assessment of the visual, functional, environmental and cumulative impacts associated with the proposed tall building, as required by Part C of Policy D9, is set out, below.

### *Visual impacts*

45. In respect of visual impacts of the proposal, the Townscape, Visual, and Built Heritage Assessment (“TVBHA”) submitted as part of the application, includes a comprehensive assessment of long, mid-range and local views.
46. Further consideration of the scheme design is provided in the design sections below. In particular, the proposed architecture and materials should be further

considered and refined, to mitigate the visual impacts arising from the tall building, and this is discussed in a subsequent section of this report.

47. The proposal will result in less than substantial harm to the significance of heritage assets, as identified within Table 1 of this report, below.
48. Glare is addressed within Chapter 10 of the submitted Environmental Statement, and this should be reviewed by the local authority.

#### *Functional impacts*

49. The application details that the safety of all occupants of the building has been a priority throughout the design process, and it is noted that a policy compliant fire statement has been submitted with the application (as further discussed in a subsequent section of this report), and fire evacuation lifts are included within the proposal.
50. Servicing of the building would take place via the existing basement (accessed from Longford Street). Gas deliveries for the laboratory land uses would be infrequent and throughout the week outside of peak hours. The application sets out that once operational, the tenants in the building would agree to a management strategy as part of their lease agreements.
51. Jobs, services, facilities, economic activity and regeneration benefits will be provided by the development, which would provide 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. As set out the submitted Employment & Skills Strategy and Regeneration Statement, the workers at the proposed development would uplift the economic output (GVA) of the site by £386m-£462m per year.
52. Interference to the reception of digital terrestrial and satellite television services is not expected. An assessment of the potential signal impacts is set out within the submitted Telecommunications Report. Mitigation Measures set out in the report should be secured by the Council.
53. There are a number of other functional impacts associated with the proposal that require resolution prior to Stage II, as detailed in the "Sustainable Development", "Environmental issues" and 'Transport' sections of this report.

#### *Environmental impacts*

54. In terms of environmental impacts, the applicant has submitted a variety of documents to address the environmental impacts associated with the proposed tall buildings including the air quality, wind microclimate, daylight, overshadowing, noise and vibration chapters of the submitted Environmental Statement as well as the submitted Ventilation Strategy. It is noted that the proposal includes a variety of wind mitigation measures, including landscaping features, and these should be tested and secured by the Council.
55. The Council the applicant's daylight, sunlight, overshadowing and wind assessments, and appropriate mitigation should be secured and integrated into

the landscape and architectural design. GLA officers will conclude on the environmental impacts at Stage 2.

#### *Cumulative impacts*

56. The proposed development raises no significant adverse impacts cumulatively with other existing and proposed tall buildings in the local area.

#### *Public access*

57. The proposals include publicly accessible areas in line with Part D of Policy D9 at ground, first and second floor levels through the inclusion of the NIL. While the inclusion of NIL is strongly supported in principle, further consideration should be had as to whether publicly accessible areas can be provided at the top of the proposed building, closer to roof level, to afford wider views across London, given the prominence of the proposed building. A Management Plan should be secured by section 106 agreement, with the public access according with the principles set out in the Public London Charter LPG.

#### Tall buildings, height and massing – conclusion

58. The proposal does not accord with Policy D9 Part B of the London Plan. Notwithstanding, it is noted that there are material considerations in relation to the site's context, specifically the existing Euston Tower (the proposals increase the AOD height at the site by 0.92 metres). As such, GLA Officers consider that taller buildings are justified in principle from an urban design perspective, despite the non-compliance with London Plan Policy D9(B).
59. An update in respect of compliance against the criteria outlined in London Plan Policy D9(C), Policy D9(D) will be provided at decision making stage.
60. Overall, subject to the further consideration of the visual, functional and environmental impacts of the proposal tall buildings, the tall buildings could be acceptable on balance.

#### Development layout

61. The development continues the existing links to the wider context and provides an opportunity to significantly improve the quality of the public realm established at the base of the building.
62. The creation of a simplified podium when considering the overall form and its relationship with the building is supported. The podium itself creates a variety of visual and functional opportunities offering shelter, pockets of entrances and interesting alternative scales to help create legibility. Although the entrance on Hampstead Road is larger than the existing context, it provides a clear visual opening in the streetscape, improving its legibility when further away, and is therefore supported.
63. The cantilevered upper levels of the podium protrude over the existing buildings footprint enclosing the open space between the existing building in the north

and the new proposal further. Although the building above the podium has been pushed further away from the existing buildings in the north, along Brock Street, this would not be experienced at ground floor/human scale. Furthermore, the northern element at the base of the building does not feel as inclusive due to the number of supporting structures, limiting views and providing areas of concern regarding sense of safety particularly when using the space in the evening and after office hours. This should be addressed by the applicant.

### Landscape and public realm

64. The overall proposal for the public realm, which includes a significant increase in the amount and variety of planting, creates a positive difference in this location, through the introduction of greenery, variety and the prospect of multi-functional public space, achieving a balance between movement and place functions. This is supported. The changes in levels, that respond to the approach at the base of the building, provides opportunity of inclusive access through biodiverse landscaping.
65. Regent's Place Plaza is proposing to offer adaptability to become a multipurpose space and so should include a multitude of elements to ensure its continued usability and futureproofing that address the GLA's Digital Connectivity Infrastructure LPG. Public access be secured in line with the Public London Charter LPG and London Plan Policy D8.
66. The public realm proposed along Hampstead Road does not include the proposed TfL cycle path. Officers recommend this be included in the drawings to demonstrate there is no impact of the schemes proposals.

### Architecture and materials

67. The 'breathing spines' introduced at the junction of each building quadrant help to break up the form of the proposed building visually and emphasise the vertical vernacular of the building, although create a series of blank elements that increase in size as the building reaches its summit. The Council should work with the applicant to limit the impact of this.
68. The architectural detailing to the two-storey amenity terraces and winter gardens located throughout the building provide further positive vertical expression of the building.
69. While GLA Officers understand that applicant has developed the materials palette through the design process to result in a lighter tone of metal and terracotta, this remains consistent throughout the building adding to the overall bulky appearance of the building. The applicant should further refine the tone of the materials used in the proposal, particularly when considering its impact in longer views.
70. The verticality of the proposal with detailed bay studies created results in an alternative approach to the fine details around the openings. These details are supported.

71. The vertical 'breathing spines' create the visual effect of a building which widens towards its summit. This accentuates the building's bulk at upper levels and should be revisited. Further exploration to minimise the building's bulk overall should be considered.

### Fire safety

72. In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the London Plan seeks to ensure that development proposals achieve the highest standards of fire safety. Policy D5(b5) of the London Plan requires that in all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
73. In line with Policy D12 of the London Plan, a fire statement has been submitted that has been prepared by a Chartered Engineer (CEng) with the Institute of Fire Engineers (MIFireE). GLA Officers are satisfied that the fire statement has been prepared by a third party, suitably qualified assessor, as required by Policy D12 and the Fire Safety draft LPG.
74. In respect of the London Plan fire evacuation lift requirement, the fire statement states that "the two central escape stair cores are provided with an associated evacuation lift which can be used by People with Reduced Mobility (PRMs). Evacuation lifts serve every floor. This meets Policy D5 of The London Plan 2021".
75. The statement concludes that "the Euston Tower proposal is designed to meet the requirement of London Plan 2021 Policy D12 Fire Safety A.1-6. It will also meet the requirements of Policy D5 Inclusive Design B.5". The Council should secure the requirements of Policy D5(b5) and D12 of the London Plan by condition.

### Inclusive access

76. Policy D5 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design.
77. The submitted Accessibility Statements outline that consideration has been given to inclusive design in relation to arrival at the site, approaches to the building, entrance ways; horizontal and vertical circulation within the building, access to facilities, sanitary provision; and the emergency evacuation strategy. The Access Statement describes how the scheme will be progressed with consideration of the principles of inclusive design, and considers the requirements of all users, visitors, staff and wider community, including people with mobility impairments, vision impairments and neuro-diverse requirements; as well as deaf people, older people; and small children.
78. The key access provisions for the proposed development include: the incorporation of the principles for inclusive design wherever possible;

accessible routes to all connections with local pedestrian routes and public transport; safe spaces and routes for pedestrians and cyclists, segregated from vehicle traffic; provision of two Blue Badge Bays at basement level; accessible cycle parking space for staff and visitors; inclusion of wheelchair-accessible sanitary facilities alongside cycling facilities, at all reception areas and at all public use areas such as cafe and public amenities; step-free access to all parts of the buildings, including terraces; and the provision of fire evacuation lifts in addition to fire-fighting lifts for safe and dignified evacuation of disabled people.

79. The design of the public realm and building access will be fundamental to how inclusive the development will be for many people. The approach set out that Accessibility Statement demonstrates that inclusive design principles have been considered from the outset, and that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and provides independent access without additional undue effort, separation or special treatment. The commitments included within the statement are supported and should be secured by condition or obligation, as appropriate.

## **Strategic views LVMF**

80. London Plan Policy HC3 and Table 7.1 identify strategic views and state that development proposals must be assessed for any impact. Policy HC4 states that proposals should not harm the characteristics and composition of Strategic Views and their landmark elements. Further detail is provided in the London View Management Framework (LVMF) Supplementary Planning Guidance (SPG). The applicant has submitted a Townscape Visual Built Heritage Assessment (TVBHA) which provides an assessment of strategic views.
81. The proposed building (and the existing building) intrudes into LVMF Views 2A.2, 2B.1 at Parliament Hill and 4A.2 at Primrose Hill LVMF of the Palace of Westminster from the north.
82. The increased width of the proposed building extends to the left away from the Protected Vista, and nominally increases the visual prominence of the building in 2A.2. However, it is recognised the increase in building form compared to the existing building would have no impact on the skyline of the most sensitive part of the view adjacent to the Protected Vista and would have no impact therefore on the ability to recognise and appreciate the Palace of Westminster (POW) in the view (in View 2A.2). It is also recognised that the proposal would have no impact on the sky above and between the principal towers of the Palace of Westminster (in View 2A.1).
83. In View 4A.2 'Primrose Hill: the summit – looking towards the POW', Although the proposal would not impact the WHS, the proposal increases the visual prominence of the building, appearing quite broad and large in the wider panorama, noting there is a reduction in sky visible around the building, in comparison between the existing and proposed buildings.

84. Viewing location 2B.1 is on the east side of Parliament Hill, is lower than the summit, and is a position that provides one of the few publicly available views of all of the principal towers of the Palace of Westminster. Although, screened by tall buildings in the middle-ground of this view, to confirm the level of impact of the proposal from this view, the applicant should provide rendered accurate visual representations (AVR) of the proposal.
85. The site lies in the background of LVMF River Prospect View 19A.1 & 19A.2 'Lambeth Bridge Downstream' Protected Silhouette. Paragraph 339 of the LVMF SPG sets out "the Protected Silhouette should not be altered by development appearing in its background at or between Assessment Points 19A.1 and 19A.2". There are no additional impacts in LVMF Views 19A.1 and 19A.2 Lambeth Bridge downstream of Westminster WHS from the River Thames, and the proposal accords with the guidance in this respect.
86. In conclusion, because of the increase in the visual prominence of the proposed building in strategic views 2A.2 and View 4A.2, the applicant should revisit aspects of the architecture and materials of the proposals with a view to reduce the impact to the protected views and the wider panorama. The applicant should continue discussions with the local planning authority in this regard. As noted above, further information should be provided to enable officers to confirm the level of impact to View 2B.1.

## **Heritage**

### Legislation, policy and guidance

87. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on local authorities to have special regard and attention to preserving listed buildings, including their settings, and to preserving or enhancing the character and appearance of Conservation Areas. The NPPF makes clear that when considering the impact of a scheme, any conflict with a heritage asset's conservation should be avoided or minimised. Paragraph 205 states that great weight should be given to a heritage asset's conservation. Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset requires clear and convincing justification. Where a proposed development will lead to substantial harm, Paragraph 207 states that consent should be refused, unless it can be demonstrated that this is necessary to achieve substantial public benefits that outweigh that harm or loss, or other criteria are met. Paragraph 208 states that where a development will lead to less than substantial harm, this harm should be weighed against the public benefits.
88. London Plan Policy HC1 requires development proposals to conserve the significance of heritage assets, avoid harm to significance, and identify enhancement opportunities by integrating heritage considerations early on in the design process. Clear and convincing justification is required for any harm; demonstration that alternatives have been explored; and that clear public benefits outweigh harm.



89. The site is in the setting of the designated heritage assets in the table below. The site is within LVMF Views 2A.2, 2B.1, 4A.2 and 19A.1 and 19A.2 with distant visibility in Views 5A.2, 11A.1, 12A.1 and 21B.1.

Assessment of impacts

90. GLA officers consider that the following levels of indirect harm are caused by the proposed development (in all cases the assessment is based on the cumulative scenario); the scale used for less than substantial harm is very low, low, low to middle, middle, middle to high, high and very high.

<b>Table 1: Indirect (setting) impacts</b>			
<b>Heritage asset</b>	<b>Category of harm</b>	<b>Extent of harm</b>	<b>View reference</b>
Westminster World Heritage Site and associated listed buildings;	Less than substantial	Low	Views 01, 02, 03, A1, A2, A3, A4, A5, A6, A7
St Paul's Cathedral, listed Grade I;	Less than substantial	Very low	View A9, A10
Regents Park Registered Park and Garden, Grade I and Conservation Area and the listed buildings within them;	Less than substantial	Low	Views 04, 05, 06, 07, 08, 16, A13, A14, A15, A16, A20, A21, B2, B3, B4, B13
BT Communication Tower, listed Grade II;	Less than substantial	Low	Views 01, 02, 03, 04, 09, 10, 11, 20, A8, A12, A17, A18, B5, B15
Number 131 Drummond Street and The Crown and Anchor Public House, listed Grade II;	Less than substantial	Very low	View 12
Fitzroy Square Conservation Area nearby to the south and the listed buildings within it;	Less than substantial	Middle	Views 19, 22
Bloomsbury Conservation Area to the southeast and the listed buildings within it including the Church of St	Less than substantial	Low	Views 13, 14, 17, 18, 20, 21, 22, 29, A22, B15, B21

Pancras, Grade I and Euston Fire Station, Grade II*;			
Harley Street Conservation Area to the southwest and the listed buildings within it;	No harm	No harm	Views A20

91. The proposed development is wider than the existing building, particularly to the east. There are no additional impacts in LVMF Views 19A.1 and 19A.2 Lambeth Bridge downstream of Westminster WHS from the River Thames. The less than substantial harm identified in Table 1, above, relates to the intrusion of both the existing and proposed buildings into LVMF Views 2A.2, 2B.1 at Parliament Hill and 4A.2 at Primrose Hill LVMF of the Palace of Westminster from the north.
92. The existing Euston Tower falls into the setting of many highly graded heritage assets. In many cases it causes some harm to those settings. The proposed development is slightly taller and somewhat wider. It therefore tends to perpetuate (and in instances slightly increase) the harm caused by the existing building, and this is reflected in the assessment in Table 1, above. It is noted that the applicant's TVBHA concludes the proposals would continue to give rise to 'harm' in NPPF terms to the significance of heritage assets in the study area generally at a lower end of less than substantial but in some instances at the middle of that scale.

### Conservation conclusions

93. The proposed development is contrary to The London Plan Policy HC1 Heritage conservation and growth Part C: "Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings". As noted above, NPPF Paragraph 208 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..."
94. The proposal will result in less than substantial harm to the significance of heritage assets, as identified within Table 1, above.
95. The scheme proposes a number of public benefits including three floors of publicly accessible space, an affordable workspace provision, delivery of the NIL, a payment in lieu to be used towards affordable housing provision within the borough, business and employment benefits (including through the creation of jobs), and improved public realm within a high-quality development. Subject to these proposed public benefits being agreed with, and satisfactorily secured by the LPA the less than substantial harm identified above would be outweighed by the public benefits of the scheme. An update will be provided at Stage II decision making stage.
- 96.

## Sustainable development

### Energy

97. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

### *Energy strategy compliance*

98. An energy statement has been submitted with the application, which does not yet comply with London Plan policies SI2, SI3 and SI4. The applicant should further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however, the outstanding policy requirements are summarised, as follows:

- **Be Lean** – Further exploration and evidencing of energy efficiency measures for the non-domestic element;
- **Managing heat risk** – Further details to demonstrate the cooling hierarchy has been followed;
- **Be Clean** – Further exploration of DHN potential and energy strategy to be futureproofed for connection to future DHN;
- **Be Green** – Demonstration that renewable energy has been maximised and reconsideration of PV provision, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
- **Be Seen** – Confirmation of compliance with this element of policy, with compliance to be secured within the Section 106 agreement; and
- **Energy infrastructure** – Further details and justification of the energy strategy and the design of district heating network connection is required, the future connection to this network must be secured by condition or obligation;

### Carbon savings

99. For the non-domestic element, the development is estimated to achieve a 14% reduction in CO2 emissions compared to 2021 Building Regulations. The development falls short of the net zero-carbon target and does not meet the minimum 35% carbon reductions on site required by Policy SI2. The carbon savings should be improved. Once the on-site carbon savings have been maximised, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended

carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price.

### Whole life-cycle carbon

100. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint. A WLC assessment has been submitted with the application. The WLC assessment complies with London Plan Policy SI2 which is strongly supported.
101. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)<sup>1</sup>.

### Circular economy

102. A circular economy statement has been submitted alongside the planning application, as required by Policy SI7 of the London Plan. Detailed technical comments in respect of circular economy have been circulated to the Council under a separate cover to be addressed in their entirety. To summarise, clarifications are required with respect to submitted information across several areas, including the submitted pre-demolition audit, the submitted materials recovery strategy, the submitted bill of materials, recycling and waste reporting, operational waste, circular economy targets and end-of-life strategy.
103. A degree of structural retention is proposed within the proposals, and GLA Officers understand that the strategy selected has been based upon the balance of structural retention, buildability, quality, flexibility, and adaptability. In line with the Circular Economy hierarchy the Applicant has demonstrated that extensive investigation has been undertaken with respect to options for in-situ retention.
104. It is noted that a Feasibility Study in respect of the existing building has been submitted as part of the application. GLA Officers understand that Camden Council has appointed independent reviewers as part of their assessment of the planning application. The outcome of this review process should be provided to GLA Officers once completed.
105. The Applicant is taking actions at this stage to maximise potential for high value reuse and recycling of components and materials on the site, and this is supported. The Applicant should provide additional information to explain how the implementation of these processes will be ensured, particularly where these go beyond standard practice in terms of demolition processes.
106. A condition should be secured requiring the applicant to submit a post-construction report. The applicant has acknowledged acceptance for this

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<sup>1</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

planning condition in the application. The template and suggested condition wording are available on the GLA [website](#)<sup>2</sup>.

### Digital connectivity

107. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

## **Environmental issues**

### Flood risk

108. The site is in Flood Zone 1 and is directly adjacent to the boundary of a Critical Drainage Area (CDA). A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF). The FRA adequately assesses the risk of flooding from fluvial/tidal, pluvial, sewer and reservoir flooding, which is considered to be low. The FRA provided for the proposed development generally complies with Policy SI.12 of the London Plan.

### Sustainable drainage

109. The drainage strategy proposes to restrict runoff to 3 l/s up to the critical design event of 1 in 100 plus 40% allowance for climate change. No assessment of the sites greenfield runoff rate has been provided, and no consideration has been given to the practicality of discharging at greenfield rate. To comply with London Plan Policy SI.13, discharge should be reduced to as close to the Qbar greenfield runoff rate for the 100-year event plus 40% climate change as possible, or robust justification must be provided as to why this cannot be achieved.
110. The drainage strategy proposes to provide the required attenuation within a combination of blue roofs and below ground attenuation tanks, which is supported. A quick storage estimate has been provided. This is not supported. The storage estimate should be supported by more detailed hydraulic calculations at this stage of application and should include a range of storm durations and return periods. The latest FEH method should be used in the design and simulation of drainage networks.
111. A drainage strategy plan which shows the site, drainage layout, SuDS and attenuation features, proposed connection points and exceedance routes should be provided.

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<sup>2</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

112. The London Borough of Camden's version of the London Sustainable Drainage Proforma should be completed and provided. The proformas for all Local Authorities can be found on the GLA's website (link, [here](#)<sup>3</sup>).
113. The surface water drainage strategy for the proposed development does not comply with Policy SI.13 of the London Plan.

#### Water efficiency

114. The Sustainability Statement notes that 2 Wat 01 credits are targeted for the non-residential uses on site, with water consumption reduced by 25%, in line with Policy SI.5 of the London Plan. Water efficient fittings and water monitoring, metering, leak detection and shut off capabilities are proposed, which are supported. The proposed development generally meets the requirements of Policy SI.5 of the London Plan.

#### Air quality

115. London Plan Policy SI1(B)(1) states that development proposals should not lead to deterioration of existing poor air quality; should not create any new areas that exceed air quality limits or delay compliance in areas that are in exceedance of legal limits; and should not create unacceptable risk of high levels of exposure to poor air quality. Policy SI1(B)(2) sets out that development proposals must be at least Air Quality Neutral and Policy SI1(C) sets out that large-scale development proposals should provide an air quality positive statement.
116. The proposed development will not lead to adverse impacts on local air quality and conditions for future residents/occupiers. Therefore, the development is compliant with London Plan Policy.
117. An Air Quality Assessment, which is of sufficient technical quality, has been submitted with the application. Notwithstanding, it is noted that the annual mean NO<sub>2</sub> objective of 40 ug/m<sup>3</sup> and Camden's Air Quality CPG target for annual mean NO<sub>2</sub> of 38 ug/m<sup>3</sup> are both referenced. Clarification should be provided as to which is used in the assessment of significance.
118. The impacts of both construction and operational traffic on local air quality were assessed by dispersion modelling. There is predicted to be negligible impacts on NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations from construction and operational traffic arising from the development.
119. The Appendix also includes modelling of a 'no improvement scheme', as required by LBC. This is robust. Concentrations are predicted to be below 38 / 40 ug/m<sup>3</sup> during operational phase. However, NO<sub>2</sub> concentrations are expected to exceed the annual mean objective during construction phase at 3

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<sup>3</sup> <https://www.london.gov.uk/what-we-do/environment/climate-change/surface-water/london-sustainable-drainage-proforma>

receptors using 2022 emissions factors. However, in both scenarios there are negligible impacts arising from the development.

120. The potential impact of odour from café/restaurants should also be considered and mitigated for.
121. A Dust Risk Assessment was undertaken. The risk level for the site was determined to be Medium. Appropriate mitigation was included. However, the IAQM guidance document used for the assessment (2014) had been updated by the time of the assessment (December 2023) and has been subsequently updated further (January 2024). The assessment should be updated on this basis or assurance given that use of the new guidance would not change the assessed risk rating.
122. An Air Quality Neutral Assessment was undertaken which has determined that the proposed development is quality neutral. An Air Quality Positive Assessment was included with the Appendix of the report and the measures outlined are suitable for the proposed development.
123. The development may include backup generators. To comply with GLA guidance, backup or emergency generators should not run for more than 50 hours annually. If included, the report should be updated to include sufficient screening and ensure no significant emissions.
124. The following conditions are recommended to be secured:
  - All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up-to-date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register.
  - Measures to control emissions during the demolition and construction phase relevant to a Medium risk site should be written into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase (London Plan Policy SI 1 (D)).
  - Use of the backup generator(s) is restricted to emergency use and operational testing (less than 50 hours per year).

## Green infrastructure, biodiversity and urban greening

125. Policy G6(D) of the London Plan 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. Policy G6(E) of the London Plan states that proposals which reduce deficiencies in access to nature should be considered positively.
126. The applicant has provided quantitative evidence that the proposal secures a biodiversity net gain of 26.90% through the combined on- and off-site contributions, in accordance with Policy G6 of the London Plan. However, on-site biodiversity enhancements are preferable, so the applicant should seek to increase the biodiversity net gains on-site where possible. Trading rules have not been satisfied. The applicant should seek opportunities to satisfy the trading rules within the site. If this cannot be achieved, the applicant should provide robust justification.
127. An Ecological Management Plan (EMP) should be prepared to support long-term maintenance and habitat creation. The EMP should be secured by planning condition and approved, if the proposed development is granted planning consent.
128. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening across the masterplan which is strongly supported and should be brought to fruition. This includes the incorporation of woodland and wetland habitat creation and biodiverse green and blue roofs which supports multifunctionality, in accordance with Policy G1 of the London Plan. The opportunity for the provision of biosolar roofing should be explored.
129. The Urban Greening Factor (UGF) score of the proposed development has been calculated as 0.348 which exceeds the target set by Policy G5 of the London Plan and should be secured by the Council. Notwithstanding, the target of Policy G5 of the London Plan should be treated as a minimum and any improvements to the quality and quantity of urban greening made where possible. The applicant should confirm that the management strategies for semi-natural vegetation within the scheme comply with the GLA's UGF LPG (link, [here](#)<sup>4</sup>).

## **Transport**

### Trip generation and public transport impact.

130. The development will be car free apart from two blue badge spaces and the existing 102 spaces will be removed, which is supported. Officers note reference to access to car parking outside the redline boundary of the site. Further information by way survey data outputs is required to enable officers to

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<sup>4</sup> <https://www.london.gov.uk/sites/default/files/2023-02/London%20Plan%20Guidance%20-%20Urban%20Greening%20Factor.pdf>



confirm the strategic impact of the development on the public transport network and pedestrian comfort levels.

### Active Travel Zone

131. The Active Travel Zone (ATZ) assessment scope within the Transport Assessment (TA) omits Warren Street station and the closest bus stops. It is noted that the active travel improvements could be delivered directly via section 278 highway agreement and by supporting TfL Healthy Streets scheme discussed below, which may explain these omissions. Notwithstanding, clarification in respect of this omission is required. Further discussion on the routes towards Camden Town, particularly in context of HS2 and other schemes in this area, is required. A night-time assessment has been undertaken, in accordance with London Plan policies T2, D5 and D8, to help identify and improve safety at night. The applicant should clarify if a wider crime audit, alongside the night-time assessment, was undertaken to help inform design.
132. The greater footway space around the bus stop on Euston Road is supported. The flexible space on the Hampstead Road footway to enable implementation of a future Healthy Streets scheme is also supported, with the likely need for a bus stop bypass in this location.
133. Along the Euston Road façade, the additional planting is supported, as well as the notion of using raised planted mounds to disguise basement utilities and provide hostile vehicle mitigation.

### On-street cycle parking

134. The proposed move of the existing cycle stands from the kerbside on the Euston Road frontage to alternative locations within the development area is supported, although it is noted there are currently 9 stands (18 spaces) in that location rather than 5 as stated on the Proposed Landscaped drawings (although the correct number is provided in fig 4.16 in the Transport Assessment). Officers accept all 9 stands being relocated.
135. While Officers support the change to the location of short-stay cycle parking on the Euston Road frontage, there are existing cycle stands at the kerbside in front of and to the east of the 2 Triton Square building. Consideration should be given to consistency and coherence of materials and street furniture in this area. A contribution to renewing and rearranging the cycle parking stands in this location is supported. As these works are within TfL Highway, the works should be agreed as part of Section 278 with TfL.

### Healthy Streets - Euston Junction scheme

136. A contribution of £1.2 million for the design and delivery of the floating bus stop/cycle layby, adjacent kerb line reconfiguration and urban realm improvements is requested. The development is expected to increase footfall and cycling to the site through Euston Circus.

137. Euston Circus has been recognised as an area with high numbers of vulnerable road users being killed or injured while walking, cycling or riding motorcycles. The improvements aim to promote junction safety to help meet the MTS Vision Zero target, if implemented would support additional demand arising from this development.
138. TfL has also developed outline proposal to green the area adjacent to this site. How these are delivered will need to be agreed with TfL such that the proposed construction and operation phases of the development do not detrimental impact delivery of these necessary improvements.

#### Cycle ramp access and cycle parking

139. The proposals represent an improvement to the existing cycle access arrangements and are supported. As the landscaping strategy is evolving it is understood that further short stay provision, including details for location of that provision in the public realm, will be finalised prior to Stage 2.
140. Location of the cycle ramp implies that the main public space will need to be shared use, to allow cycles to access from Brock Street and Hampstead Road as well as Euston Road. The applicant should clarify where in the public space they expect cycles to need to access and what measures will be taken to minimise cycle/pedestrian interaction and reduce cycle speeds. Level access from the Euston Road kerbside is also required to facilitate access to the cycle parking area.
141. The scheme includes 861 long stay cycle spaces (646 two-tier, 86 foldable, 86 Sheffield stands, and 43 enlarged Sheffield stands plus cycle reception and end of cycle facilities). These are in line with London Plan standards and should be secured by condition. The short stay cycle parking should also be secured by condition.

#### Cycle hire

142. A contribution of £200,000 for a new Cycle Hire docking station within the site should be secured. Discussions in respect of the most appropriate location for the docking station are required between TfL and the applicant.

#### Highway oversailing and works on TfL highway

143. Any works on TfL highway being temporary or permanent will require TfL agreement. All works on TfL highway should be designed in accord with TfL Street Toolkits and subject to Road Safety Audit.
144. The existing 'fins' installed for wind mitigation purposes oversail the public highway on the corner of Euston Road and Hampstead Road. There is subject to an oversailing licence with TfL.
145. It is now proposed the podium at Levels 2 and 3 will oversail the public highway on the corner of Euston Road and Hampstead Road. The proposed oversailing

of the highway on Euston Road/Hampstead Road will be a minimum of 5.7 metres above the height of the public highway. Oversailing TfL highway is subject to Technical Approval Authority and TfL Asset Operations advice, before TfL could grant a license under Section 177 of the Highways Act 1980 (as amended). It is recommended an informative to this effect is included as part of any decision notice.

### Construction

146. The submitted Outline Construction Logistics (CLP) does not present an agreed way forward with TfL as the Highway Authority in respect of mitigating construction impacts. There are significant challenges to overcome regarding the ability to deliver and implement the proposals, as well as objection from the TfL Asset Operations and London Buses. Once resolved, impact analysis will be required to establish the economic impact to TfL, which will form the basis of a required financial mitigation package.
147. The proposals will affect TLRN capacity and Bus Lane operation, impacting TfL customer over a period of five years. Construction stage modelling will be required to establish the traffic impact and changes to traffic and bus speeds. The impact on pedestrians and cyclists should be assessed and the preparation of a pedestrian and cycle management strategy during the construction period should be prepared.

### Demand management

148. The planning application is supported Outline Travel Plan, Delivery and Servicing Plan (DSP); Car Parking Design and Management Plan (CPDMP), Outline Construction Logistics Plan (CLP); and Construction Management Plan Camden Proforma (CMP), all of which should be secured by planning obligation or by condition.

## **Local planning authority's position**

149. Camden Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

## **Legal considerations**

150. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article

7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

151. There are no financial considerations at this stage.

## Conclusion

152. London Plan policies on the Central Activities Zone, opportunity areas, office/community/retail land uses, affordable workspace, affordable housing, urban design, tall buildings, strategic views, inclusive access, fire safety, heritage, energy, circular economy, whole-life cycle carbon, digital connectivity, flood risk, sustainable drainage, water efficiency, air quality, open space, biodiversity, green infrastructure and urban greening, trees and transport are relevant to this application. Whilst the proposal is supported in principle, the application does not currently comply with all these policies, as summarised below:

- **Land use principles:** The principle of the commercial-led, mixed-use development including office, laboratory enabled floorspace and community spaces accords with the vision of the Knowledge Quarter, and the Euston Opportunity Area, as set out in the London Plan, Euston Area Plan and Camden's Draft Site Allocations Plan
- **Urban design and heritage:** The inclusion of a tall building in this location is acceptable in principle, noting the existing tall building on the site. Further refinement is required in respect of the architecture and materiality of building, particularly when considering its impact in longer views, to reduce the overall bulk of the proposals. Less than substantial harm has been identified to a number of heritage assets, including the BT Tower and Fitzroy Square Conservation Area. A number of public benefits have been identified within this report, however other strategic planning matters must be resolved, and public benefits secured prior to arriving at the balance of harm versus public benefit. An update will be provided at decision making stage (Stage II).
- **Energy:** Further information is required to address the London Plan's energy hierarchy (be lean, be clean, be green and be seen), the cooling hierarchy and the design of district heating network connection. The development is estimated to achieve a 14% reduction in CO2 emissions compared to 2021 Building Regulations, which falls short of the net zero-carbon target and does not meet the minimum 35% carbon reductions on site required by Policy SI2. Once the on-site carbon savings have been maximised, a carbon offset payment should be secured.

- **Circular economy:** Extensive investigation has been undertaken with respect to options for in-situ retention, which is supported in line with the London Plan's Circular Economy hierarchy. Notwithstanding, further technical information is required to ensure full compliance with Policy SI 7 of the London Plan.
- **Sustainable drainage:** The surface water drainage strategy for the proposed development does not currently comply with Policy SI.13 and requires further consideration. A drainage strategy plan which shows the site, drainage layout, SuDS and attenuation features, proposed connection points and exceedance routes should be provided.
- **Air quality:** The proposed development will not lead to adverse impacts on local air quality and conditions for future residents/occupiers and is therefore compliant with London Plan Policy. Notwithstanding, the applicant should address the technical comments provided within this report. Conditions in respect of construction and operation of the proposed development are recommended.
- **Green infrastructure:** An Ecological Management Plan should be secured by condition. The applicant should also confirm management strategies for semi-natural vegetation comply with guidance set out in the policy review, in relation to the UGF score.
- **Transport:** Further information is required to confirm impact of the proposals on public transport and in respect of the Active Travel Zone Assessment. A contribution of £1.2 million towards the Euston Circus Healthy Streets scheme is required, including the design and delivery of the floating bus stop/cycle layby, and £200,000 is required towards a new Cycle Hire docking station within the site. Conditions are required to mitigate transport impacts during construction and operation.

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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.