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Our ref: ND/KT/U0025936
Your Ref: PP-12884937

28 March 2024

Dear Chris

Town and Country Planning Act 1990 (as amended)
S73 Application for Variation of Condition 2, 9, 13 and 15
Tavis House, 1-6 Tavistock Square London, WC1H 9NA

On behalf of our client, Tempus Realty Holdings 1 (Jersey) Ltd (the 'Applicant'), we enclose an application for the variation of conditions 2, 9, 13 and 15 following the grant of Planning permission for the redevelopment of Tavis House, 1-6 Tavistock Square.

The applicant has identified the opportunity to bring forward the building for Life Science occupiers by converting the building to Class E lab enabled space which would make a significant contribution to the Knowledge Quarter. The proposed changes fully align with the approved scheme, but alterations are required to the rear façade and roof level. The proposal does not alter the approved GIA areas.

Background

A full summary of the relevant planning history is set out within the approved Planning Statement dated 10 December 2021.

Planning permission was granted on 1 December 2023 under reference 2021/6105/P for the:

Refurbishment and extension of the existing building to provide new entrances, a new roof top pavilion, roof top plant equipment and enclosures, rear extension and cycle parking associated with Class E use together with new hard and soft landscaping and other ancillary works.

It is this permission, that this Section 73 application seeks to amend.

Pre-Application Engagement

London Borough of Camden

The proposals have evolved through a series of pre-application meetings with Officers of the London Borough of Camden. A pre-application meeting was held on 7 February 2024 with Senior Officers at Camden Council to discuss the proposed amendments. A second pre application meeting was held on 22 February to further discuss roof top plant and the rear elevation.

The key feedback that was received is briefly summarised as follows:

- The use of the building for life science and the benefits this would deliver to the Knowledge Quarter which is of strategic importance to the Council.
- The removal of the proposed windows on the return of the building along Tavistock Place is acceptable
- The removal of balconies on the rear façade is acceptable
- The proposed minor area of demolition and re-build of part seventh and eighth floors is accepted
- The team should explore the incorporation of PV and a green roof
- The team should explore design opportunities for roof top plant including the strobic fans

The proposals have developed iteratively in direct response to Officer feedback; further detail on the design development of the proposals can be found in the Design and Access Statement, prepared by Gort Scott Architects.

Community Consultation and Engagement

Kanda has undertaken a programme of consultation in February and early March 2024 and sought to contact the following local stakeholders to inform them of the proposals:

- Ward Councillors
- Bloomsbury Conservation Area Advisory Committee (BCAAC)
- Local Businesses including Mary Ward House
- Local Residents along Burton Street

In summary, there has been limited concern or interest in the proposed amendments at Tavis House.

The Proposal

To capture the proposed amendments, this Section 73 application seeks for the variation of Conditions 2, 9, 13 and 15 pursuant to planning permission reference 2021/6105/P. Please note, the updated plans for inclusion in Condition 2 are set out in Appendix 1. Amendments to the wording of Conditions 9, 13 and 15 are shown in **red italics**.

The description for the proposed application is:

“Variation of conditions 2, 9, 13 and 15 approved under planning permission reference 2021/6105/P on 1 December 2023 for ‘Refurbishment and extension of the existing building to provide new entrances, a

**new roof top pavilion, roof top plant equipment and enclosures, rear extension and cycle parking associated with Class E use together with new hard and soft landscaping and other ancillary works'.
NAMELY amendments to external rear facades, rooftop plant and other associated works."**

The enclosed application seeks to replace and substitute a number of drawings and reports identified in Condition 2. The replacement drawings are set out in Appendix A.

Condition 2 reads:

The development hereby permitted shall be carried out in accordance with the following approved plans:

Existing drawings

TAH-ORM-ZZ-ZZ-DR-A-12099, TAH-ORM-ZZ-00-DR-A-12000 P02, TAH-ORM-ZZ-01-DR-A-12001 P02, TAH-ORM-ZZ-04-DR-A-12002 P02, TAH-ORM-ZZ-07-DR-A-12003 P02, TAH-ORM-ZZ-08-DR-A-12004 P02, TAH-ORM-ZZ-RF-DR-A-12005 P02, TAH-ORM-ZZ-LG-DR-A-12006 P02, TAH-ORM-ZZ-AA-DR-A-12300 P02, TAH-ORM-ZZ-BB-DR-A-12301 P02, TAH-ORM-ZZ-WE-DR-A-12400 P02, TAH-ORM-ZZ-EA-DR-A-12401 P02, TAH-ORM-ZZ-SO-DR-A-12402 P03.

Demolition drawings

TAH-ORM-ZZ-00-DR-A-12100 P02, TAH-ORM-ZZ-01-DR-A-12101 P02, TAH-ORM-ZZ-04-DR-A-12102 P02, TAH-ORM-ZZ-07-DR-A-12103 P02, TAH-ORM-ZZ-08-DR-A-12104 P02, TAH-ORM-ZZ-RF-DR-A-12105 P02, TAH-ORM-ZZ-LG-DR-A-12106 P02, TAH-ORM-ZZ-WE-DR-A-12410 P02, TAH-ORM-ZZ-EA-DR-A-12411 P03, TAH-ORM-ZZ-SO-DR-A-12412 P03.

Proposed drawings

TAH-ORM-ZZ-00-DR-A-12200 P03, TAH-ORM-ZZ-01-DR-A-12201 P02, TAH-ORM-ZZ-04-DR-A-12202 P02, TAH-ORM-ZZ-07-DR-A-12203 P02, TAH-ORM-ZZ-08-DR-A-12204 P02, TAH-ORM-ZZ-09-DR-A-12205 P02, TAH-ORM-ZZ-LG-DR-A-12206 P03, TAH-ORM-ZZ-AA-DR-A-12320 P02, TAH-ORM-ZZ-BB-DR-A-12321 P02, TAH-ORM-ZZ-WE-DR-A-12420 P03, TAH-ORM-ZZ-EA-DR-A-12421 P03, TAH-ORM-ZZ-SO-DR-A-12422 P02.

Documents

Cover letter by Gerald Eve dated 10.12.2021; Design and Access Statement by Orms dated 10.12.2021; Heritage and Townscape Statement by Jon Lowe Heritage dated 10.12.2021; Daylight, Sunlight & Overshadowing Report by Point 2 dated November 2021; Financial Viability Assessment by DS2 dated 15.12.2021; Noise Assessment Report by Hoare Lee rev 1 dated 16.11.2021; Town Planning Statement by Gerald Eve dated 10.12.2021; Statement of Community Involvement by Kanda dated 10.12.2021; Transport Statement by Motion dated 03.12.2021; Planning response - facades updated dated 10.03.2022; Air Quality Assessment by Hoare Lee rev 02 dated 08.12.2021; Energy Statement by Twin Earth dated 10.12.2021; Sustainability Statement by Twin Earth dated 10.12.2021; Flood Risk Assessment by Elliot Wood dated 10.12.2021; Surface Water Drainage Statement by Elliot Wood dated 07.02.2022; GLA Carbon emission reporting spreadsheet v1.2; Camden LLFA SUDS proforma; London Sustainable Drainage Proforma.

The amendment seeks a lab-enabled accommodation which will result in fewer people using the building. Condition 9 (Installation of Cycle Parking) therefore needs to be amended to read:

Prior to first occupation of the development, ~~115~~ 35 long-stay cycle parking spaces shall be provided for staff within the basement cycle store as shown on the approved drawing.

~~14~~ 9 short-stay spaces shall be provided within the ground floor cycle store as shown on the approved drawing, which shall include ~~6~~ 1 larger spaces for nonstandard cycles which are clearly demarked as such.

The cycle storage areas shall be provided in their entirety prior to the first occupation of the development, and permanently retained thereafter.

In the event that the building operates as office (Use Class E), 115 long stay cycle spaces and 14 short stay cycle parking spaces will be provided.

The lab-enabled use will require additional roof plant which will result in an amendment to the size of the approved blue roof. Condition 13 (SuDS: Further Details) should therefore be amended to read:

Prior to commencement of above ground works (excluding demolition and site preparation works), full details of the sustainable drainage system [including ~~666~~ 588sqm blue roof at 8th and 9th floor level] shall be submitted to and approved in writing by the local planning authority. Such a system should be designed to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change such that flooding does not occur in any part of a building or in any utility plant susceptible to water, or on any part of the entire development site for up to and including a 1:30 year storm. The details shall demonstrate a run-off rate conforming to the greenfield run-off rate or other rate of ~~1.3l/s~~ 2.0l/s approved by the Local Planning Authority. An up to date drainage statement, SuDS proforma, a lifetime maintenance plan and supporting evidence should be provided including:

- The proposed SuDS or drainage measures including storage capacities
- The proposed surface water discharge rates or volumes

Systems shall thereafter be retained and maintained in accordance with the approved details.

As a result of additional roof plant, it has not been possible to accommodate a green wall at roof level. Condition 15 (Green Wall Details) is proposed to be amended to state:

Prior to commencement of above ground works (excluding demolition and any site preparation works), full details in respect of the green walls surrounding the rooftop plant room and UKPN substation/bin store shall be submitted to and approved in writing by the local planning authority. Details of the green walls provided shall include: species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green roof, as well as details of the maintenance programme for green roof.

The building shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.

Proposed Design Alterations

The interior of the building has been redesigned to incorporate a mix of laboratories and write up space. A number of laboratory work benches are proposed along the rear façade resulting in design amendments to the exterior of the building overlooking the courtyard space.

The amendments are set out in detail in the addendum Design and Access Statement prepared by Gort Scott. In summary, the key changes to the approved scheme are as follows:

- Raised cill height to reflect lab space planning and limit solar gains on the rear facade
- Double height opening at rear to allow vehicle turning in rear yard
- Removal of balconies on the rear façade
- Use of 8th and 9th floor rooftops for plant and servicing including strobic fans
- Removal of the lift overrun from roof level
- Expansions of services to ground floor yard
- UKPN substation relocated
- Bin store relocated internally
- Infill of the external escape stair
- Increased works to existing structure
- Retention of the existing flank wall, and removal of the approved windows

The proposals have been designed iteratively to respond to feedback received during the pre-application process, in addition to design development to create a flexible building suitable for life sciences. The proposals will result in a high-quality building fabric fit for purpose for a world class institution. The proposed amendments offer longevity and extend the lifetime of the building as a whole.

Whilst there are proposed amendments to the overall massing of the building, i.e. the infill of the external stair and re-design of rooftop plant, the GIA does not vary from the approved scheme. Furthermore, the proposals do not exceed the height of the approved scheme, and as demonstrated in the DAS and Townscape Report, will not result in any additional visual impact when compared to the consented scheme.

Planning Policy Considerations

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

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

- The London Plan (2021)
- The Camden Local Plan (2017)

The NPPF (2023) and National Planning Practice Guidance (“NPPG”) and are both material considerations.

Statutory Tests

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that Local Planning Authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.

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

Emerging planning policy

Camden first consulted on their draft Site Allocations Local Plan (SALP) between 13 February and 27 March 2020. A second round of consultation was undertaken between 30 November 2021 and 24 January 2022 to reflect national, regional and neighbourhood level planning changes. A call for sites and issues and options on the Local Plan Review was carried out between 4 November 2022 and 13 January 2023.

Camden Council consulted on the draft new Local Plan (Regulation 18) from 17 January 2024 to 13 March 2024. The Local Plan will cover the period from 2026 – 2041 and is targeting adoption in Summer 2026.

The draft Local Plan is still at an early stage and having regard to the three tests set out in Paragraph 48 of the NPPF, carries very limited weight.

Principle of Development

Chapter 1 of the London Plan sets out how growth should be managed in the Capital to build strong and inclusive communities, making the best use of land, creating a healthy city, delivering the homes Londoners need, growing a good economy and increasing efficiency and resilience.

London Plan Policy GG1 encourages development to seek to ensure changes to the physical environment achieve an overall positive contribution to London.

London Plan Policy GG2(C) sets out that development should proactively explore the potential to intensify the use of land to support additional workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling. London Plan Policy GG2(D) highlights that proposals should use a design-led approach to determine the optimum development capacity of sites. London Plan Policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites. Policy E1 echoes this and makes specific reference to improvements to the quality, flexibility, and adaptability of office space.

Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs, and infrastructure by supporting development that makes the best use of the site, providing a mix of uses in accessible parts of the borough to deliver 16,800 new homes, 695,000sqm of new office floorspace and 30,000sqm of new retail floorspace by 2031. The Council anticipate the most significant growth to be delivered across the whole Borough, with Central London playing a key role in facilitating that growth.

The Proposed Development does not amend the approved floorspace and as such will deliver 7,897 sqm of high-quality space for life sciences (Class E) which is supported by planning policy at a regional and local

level. The proposed space has been designed to cater for a future life science occupier. The provision of life science space is a key supporting function for Camden's growing Knowledge Quarter and will contribute to the principle of clustering within the CAZ.

The application proposes a more efficient use of the land, which is consistent with the aims of sustainable development. The Proposed Development seeks to optimise and re-use the existing building, to create a lab enabled building in the heart of the Knowledge Quarter, helping to contribute towards a successful and inclusive economy. As per the approved scheme, the proposals provide an opportunity to increase the density of the Site in accordance with the character of the surrounding area whilst ensuring that the impacts of the development are acceptable in environmental terms. The proposed amendments to the approved scheme are therefore considered to still be in accordance with the NPPF, London Plan Policies GG1, GG2 and D3 and Policy G1 of the Local Plan.

Design

The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 131 states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

Paragraph 135 of the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, which will function well over the lifetime of the development, are visually attractive, sympathetic to local character, establish a strong sense of place, optimise the potential of the site, and create places that are safe.

Paragraph 200 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

London Plan policy D2 states that the density of development should be proportionate to the site's connectivity and access to public transport. Policy D3 sets out that all development must make the best use of land and use a design led approach to optimise the capacity of sites. Part B of the policy states that development proposals should have regard to form and layout, experience and respond to the quality and character of the surroundings.

London Plan Policy D4 states that the design of development proposals should be thoroughly scrutinised. The scrutiny of a proposed development's design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping.

London Plan Policy HC1(C) requires development proposals affecting heritage assets, and their settings, to conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. In turn, development proposals should avoid harm and identify enhancement opportunities encouraging heritage considerations early in the design process.

Local Plan design policy D1 seeks to secure high quality design in development. Policy D2 states that the Council will preserve and where appropriate enhance Camden's heritage assets and their settings. This includes a general presumption in favour of retaining buildings that make a positive contribution to the character and appearance of the conservation area.

The proposal seeks to enhance the existing building fabric and reposition the building to provide lab enabled space in the Knowledge Quarter. The proposals build upon the approved design to provide a sympathetic, high-quality design which would preserve and enhance the character and appearance of the building and its contribution to the character of the conservation area. The proposal would also preserve the setting of the Grade I listed Mary Ward House.

Additional and different plant is required to that approved to enable the incorporation of the laboratory use; however, this has been minimised as far as possible. Further space is required for mechanical ventilation and fume extract. As such, the eighth and ninth floors will accommodate rooftop plant with acoustic screening integrated into the façade design. This has led to a decrease in height from the approved position. Strobic fans are proposed at the eighth floor. Utilising internal floor area for plant will reduce the impact on townscape views.

Due to plant replacement routes, a green roof on rooftop plant can no longer be accommodated. The Section 73 therefore proposes the replacement of this with an area of greening around the perimeter of the proposed roof light. Greening will still be accommodated either side of the substation as per the approved position.

The re-arrangement of the rooftop plant subsequently results in the removal of the approved roof terrace at ninth floor level. At eighth floor level the terrace facing the rear of the building will be reduced in size and located on the eastern corner. A winter garden is proposed at eighth floor with associated roof lights above to provide amenity space to employees.

To offset the floorspace lost to plant, the existing external escape stair at the rear of the property is proposed to be infilled. The approach to the massing has been derived from the need to retain as much of the existing structural frame as possible, whilst giving consideration to the varying townscape contexts. This addition creates a more uniform façade at the rear, and more flexible floorplates throughout.

PV panels are proposed at roof level, however this still remains below the previously approved height.

On the existing return elevation onto Mary Ward House, following feedback from the Bloomsbury CAAC as part of the approved scheme, and to facilitate lab-enabled space, the return is proposed to remain as existing, i.e. a plain brick façade.

The cill height on the rear façade has been increased to match proposed benching associated with laboratory use, thus reducing the quantum of glazing across the façade. The approved balconies on the rear façade will be removed to utilise additional space for a lab-enabled use. These amendments would create a more uniform rear façade which would improve the surrounding area. The proposed changes would emphasise the horizontal banding and would establish a top, middle, and bottom order to reflect the current design of the building. Solar gain would be reduced through the increased cill heights (which reduces the risk of overheating); however, daylight levels are still acceptable, and windows would be openable to allow flexibility for office retrofit in future.

In terms of appearance, the Proposed Development presents an opportunity to refresh the appearance of the building. The proposed material palette comprises glazed ceramic uprights with a texture pigmented pre-cast concrete. Verticals are expressed in glazed brick, whilst horizontals combine metal and pigmented

concrete. Further details of the proposed materials are set out within the Design and Access statement prepared by Gort Scott.

There are no amendments proposed to the front façade of the building save for louvered windows within the lightwell, and the verified views demonstrate there is negligible impact from the amendments to rooftop plant and addition of PV panels on views from Tavistock Square.

The Heritage and Townscape Statement prepared by Jon Lowe Heritage concludes that the proposed amendments would not cause harm to the setting and significance of nearby listed buildings, in particular the Mary Ward Centre; conversely the design offers high quality detailing and materials that would complement the setting of the listed building. The proposed landscaped gap that separates the Site from the listed building would be enhanced in line with the approved position.

The proposed changes mostly relate to the more visually obscured parts of Tavis House which offer little or no contribution to the setting of these listed buildings. Jon Lowe Heritage has therefore concluded that given the nature and scale of the proposed amendments, these are not considered to cause an increase or variance to the impact on the setting of listed buildings in the wider context and the proposed amendments are not considered to have an adverse effect on their significance.

It is considered that the Proposed Development would secure the delivery of a high-quality building that respects and positively responds to the local context and character. The proposals therefore fully comply with the NPPF, London Plan Policies D2-D4, HC1, Local Plan policy D1 and the Design CPG.

Sustainability

At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

The NPPF contains the Government's policy on climate change. Paragraph 158 states that local planning authorities are required to adopt proactive strategies to mitigate and adapt to climate change. Paragraph 159, states that to support the move to a low carbon future, local planning authorities should plan for new development in locations and ways that reduce greenhouse gas emissions, such as through its location, orientation, and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Policy CC1 of the Local Plan sets out that the Council will require all developments to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation by promoting zero carbon development, requiring all development to reduce carbon dioxide emissions through the London Plan energy hierarchy and to promote sustainable travel.

Sustainability is a key aspect of the Proposed Development in all manners, not only in terms of BREEAM and life-time carbon reduction but in its operational phase in terms of health and wellbeing. It is recognised that laboratory uses are more energy intensive during operation and require greater structural stability through the building in the design, and as such a number of additional sustainability measures have been incorporated into the proposed amendments.

The following measures are proposed in order for the development to use less energy and manage demand during operation:

- High levels of insulation and high-performance glazing for the new build extension
- Openable windows for natural ventilation
- Improved air tightness as the new build portions target low air permeability rates
- Low energy lighting
- Air source heat pumps for heating, cooling and DHW to the showers and end of trip facilities
- Renewable on-site generation through PV panels on the roof providing 6.6kW peak.

As a result of the sustainability initiatives noted above, the Section 73 proposals will still achieve BREEAM 'Excellent'.

In order to incorporate life science within the building, the floors require strengthening to support the weight of the equipment. A proportion of each floorplate will require structural intervention to align with the proposed technical performance of the building and the provision of laboratory space. These spaces have been largely located within the new east infill that have new structure, reducing works to the existing building fabric.

Significant temporary steel propping at the 7th and 8th floor levels would be required to retain this part of the building whilst the structural works are undertaken. It is therefore proposed to temporarily deconstruct 27% of the total façade at 7th and 6% of the façade at 8th floor and rebuild like-for-life this element of the building resulting in a lower use of carbon. The works would be kept to the minimum required in order to carry out the strengthening works. Calculations have demonstrated that the embodied carbon from the deconstruction and re-build would be a 13% improvement in comparison to the retention with temporary steel propping scheme. In addition, this approach would reduce the construction programme and number of deliveries offering further sustainability and amenity benefits.

The proposed amendments have been compared against the Approved Document Part L and the Part L 2021 to provide a concise comparison to the approved scheme. The modelling shows a total 36% reduction in carbon emissions against the GLA's Basement (A Part L 2021) after demand reduction (Be Lean), energy efficient supply (Be Clean) and incorporation of renewable technologies (Be Green).

When compared to Part L 2013, the modelling for the proposed amendments demonstrates a 17% reduction in carbon emissions through passive and energy efficiency measures alone. This increases to a 45% reduction in carbon emissions against Part L 2013 after demand reduction (Be Lean), energy efficient supply (Be Clean) and incorporation of renewable technologies (Be Green). The approved scheme had a 46% reduction in carbon emissions, the marginal decrease is considered acceptable given the use of the building for life sciences and the increase in plant required for this.

The Sustainability Statement prepared by Twin & Earth confirms that the proposed amendments will continue to meet the targets contained in the approved Section 106 Agreement.

SuDS

Policy CC3 of the Local Plan seeks to reduce flood risk and maximise water efficiency through the use of Sustainable urban Drainage Systems (SuDS) to achieve greenfield runoff rates where feasible.

The Water and Flooding CPG published in March 2019 sets out detailed standards for promoting water efficiency including rainwater harvesting, recycling water through grey water systems and SuDS.

An addendum Surface Water Drainage Statement has been prepared by Elliott Wood to reflect the minor changes to the building in respect of the blue roofs and the SuDS approach. The SuDS strategy previously approved allowed for 666sqm of blue roof at 8th and 9th floor level and this was conditioned. The proposed amendments sought via this Section 73 application result in a change in roof level and plant area, and subsequently the extent of blue roof and the achievable run-off rates need to be revised.

As part of this application, it is sought to install a blue roof system over 8th, 9th, and roof level. It is not possible to install a blue roof across the 8th floor terrace as the build-up needs to be minimised across this area in order to achieve sufficient height in the lab space below. The blue roof will therefore cover 588sqm rather than the previously approved 666sqm. Whilst there is a decrease from the permitted quantum, the proposals are a significant betterment when compared to the existing scenario and policy compliant.

Given the proposed amendments to the roof area, and necessity to accommodate plant associated with a lab enabled building, the blue roof is now split into four areas rather than two. Each section of blue roof has an associated minimum discharge rate that can be achieved, which is why the proposed discharge rate has had to increase slightly and as such the discharge rate has increased from 1.3l/s to 2.0l/s.

Air Quality

Paragraphs 185,186 and 188 of the NPPF require local authorities to ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living and the natural environment. Furthermore, planning policies should seek to improve the air quality and mitigate any impacts through traffic and travel management, green infrastructure, and enhancement.

London Plan policy S1 relates to improvements to air quality with a criteria-based approach to ensuring that new developments are designed and building as far as is possible to improve the local air quality and reduce the extent to which the public are exposed to poor air quality.

Camden's Local Plan requires the submission of air quality assessments for developments that could cause harm to air quality through policy CC4. Mitigation measures are expected in developments located in areas of poor air quality.

The Proposed Development requires additional plant to incorporate the laboratory use associated with a life science building. The Air Quality report prepared by Hoare Lea concludes that the conclusions of the site suitability assessment carried out in the approved Air Quality Assessment remain valid, as a worst-case scenario, and the site remains suitable for the proposed use.

Transport

London Plan Policy T1 also states that developments should facilitate the delivery of the mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle, or public transport by 2041. London Plan policy T5 sets out minimum cycle parking standards for new developments. For office (Old Use Class B1) use, Table 10.2 requires one space per 75 sqm GEA for long stay cycle parking, for short stay cycle parking, the requirements are 1 space per 500sqm GEA for the first 5,000sqm, and thereafter 1 space per 5,000sqm GEA, this results in 115 long stay and 11 short stay cycle spaces.

Lab enabled spaces generate a much lower requirement of cycle spaces given the reduction in staff on site. In line with London Plan Table 10.2, light industry/ research, and development (Old Use Class B1) requires one space per 250sqm for long stay cycle parking, and for short stay cycle parking the requirements are one space per 1000sqm. This results in a decrease in the number of cycle parking spaces required to 35 long stay spaces and 9 short stay spaces.

The cycle spaces will be a mixture of stacker and Sheffield stands, accessed via steps with a cycle chute/wheel ramp – this remains as approved. It is considered that the proposal meets the policy requirements at a National, Regional and Local level.

In the event that the building operates under Use Class E as traditional office, rather than lab space, 115 long stay cycle spaces and 14 short stay cycle parking spaces will be provided as per the approved position. With regards to the delivery and servicing, the overall strategy remains the same as consented, these are set out within the Addendum Transport Statement prepared by Motion.

Summary

This application seeks design amendments to the approved development. The amendments would provide state of the art flexible lab-enabled floorspace which can be adapted in the future. The amendments maintain the sympathetic, subordinate, and high standard of design quality and materiality of the approved scheme and would preserve and enhance the character and appearance of the building and its contribution to the character of the conservation area. The proposal would continue to preserve the setting and significance of the Grade I listed Mary Ward building. The proposed amendments are therefore considered to be in accordance with National, Regional and Local Policy and Guidance.

Whilst the proposals enable lab use, key design features are retained to allow the space to accommodate a higher density office for future flexibility.

Application Enclosures

This Section 73 application has been submitted via Planning Portal reference number PP-12884937. The application submission documentation was agreed with Camden Council Planning Officers as part of the pre-application process. Where appropriate, documents are addendums to approved reports rather than full new reports to reflect the submission mechanism. This application comprises the following documentation:

1. Covering Letter (this document), prepared by Gerald Eve
2. Application forms (ref. PP-12884937), prepared by Gerald Eve
3. CIL Additional Information Form, prepared by Gerald Eve
4. Design and Access Statement, prepared by Gort Scott Architects
5. Demolition and Proposed Plans, prepared by Gort Scott Architects
6. Demolition and Proposed Sections and Elevations, prepared by Gort Scott Architects
7. Schedule of Accommodation, prepared by Gort Scott Architects
8. Addendum Transport Statement, prepared by Motion
9. Travel Plan, prepared by Motion
10. Draft CMP, prepared by Motion
11. Financial Viability Assessment, prepared by DS2
12. Energy Statement, prepared by Twin and Earth
13. Sustainability Statement, prepared by Twin and Earth
14. Heritage and Townscape Statement prepared by Jon Lowe Heritage

- 15. Flood Risk Assessment, prepared by Elliott Wood
- 16. Surface Water Statement, prepared by Elliott Wood
- 17. Noise Assessment Report, prepared by Hoare Lea
- 18. Air Quality Confirmation Statement, prepared by Hoare Lea

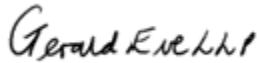
Submission Details

The planning application has been submitted via the Planning Portal reference PP-12884937 and the application fee of £357.00 has been paid to the London Borough of Camden via the Planning Portal.

We trust that the information submitted in support of this application is sufficient to ensure validation and we look forward to confirmation of this shortly.

If you have any questions in the meantime, please contact Natalie Davies (0207 333 6371) or Kathryn Tyne (020 3486 3735) of the above office.

Yours sincerely,



Gerald Eve LLP

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Enc as above.

Appendix A

Approved drawing reference number	S73 proposed drawing reference number
Demolition	
TAH-ORM-ZZ-00-DR-A-12100 P02	222-GSA-XX-00-DR-A-1610 P02 Demolition Ground Floor Plan
TAH-ORM-ZZ-01-DR-A-12101 P02	222-GSA-XX-01-DR-A-1611 P02 Demolition First Floor Plan
TAH-ORM-ZZ-04-DR-A-12102 P02	222-GSA-XX-02-DR-A-1612 P02 Demolition Second Floor Plan
	222-GSA-XX-03-DR-A-1613 P02 Demolition Third Floor Plan
	222-GSA-XX-04-DR-A-1614 P02 Demolition Fourth Floor Plan
	222-GSA-XX-05-DR-A-1615 P02 Demolition Fifth Floor Plan
	222-GSA-XX-06-DR-A-1616 P02 Demolition Sixth Floor Plan
TAH-ORM-ZZ-07-DR-A-12103 P02	222-GSA-XX-07-DR-A-1617 P02 Demolition Seventh Floor Plan
TAH-ORM-ZZ-08-DR-A-12104 P02	222-GSA-XX-08-DR-A-1618 P02 Demolition Eighth Floor Plan
TAH-ORM-ZZ-RF-DR-A-12105 P02	222-GSA-XX-09-DR-A-1619 P02 Demolition Ninth Floor Plan
TAH-ORM-ZZ-LG-DR-A-12106 P02	222-GSA-XX-B1-DR-A-1609 P02 Demolition Basement Plan
TAH-ORM-ZZ-WE-DR-A-12410 P02	222-GSA-XX-ZZ-DR-A-1801 P02 Demolition West Elevation
TAH-ORM-ZZ-EA-DR-A-12411 P03	222-GSA-XX-ZZ-DR-A-1800 P02 Demolition East Elevation
TAH-ORM-ZZ-SO-DR-A-12412 P03	222-GSA-XX-ZZ-DR-A-1802 P02 Demolition South Elevation
Proposed	
TAH-ORM-ZZ-00-DR-A-12200 P03	222-GSA-XX-00-DR-A-2100 P07 Proposed Ground Floor Plan
TAH-ORM-ZZ-01-DR-A-12201 P02	222-GSA-XX-01-DR-A-2101 P06 Proposed First Floor Plan
TAH-ORM-ZZ-04-DR-A-12202 P02	222-GSA-XX-02-DR-A-2102 P06 Proposed Second Floor Plan
	222-GSA-XX-03-DR-A-2103 P06 Proposed Third Floor Plan
	222-GSA-XX-04-DR-A-2104 P06 Proposed Fourth Floor Plan
	222-GSA-XX-05-DR-A-2105 P06 Proposed Fifth Floor Plan
	222-GSA-XX-06-DR-A-2106 P06 Proposed Sixth Floor Plan
TAH-ORM-ZZ-07-DR-A-12203 P02	222-GSA-XX-07-DR-A-2107 P06 Proposed Seventh Floor Plan
TAH-ORM-ZZ-08-DR-A-12204 P02	222-GSA-XX-08-DR-A-2108 P06 Proposed Eighth Floor Plan
	222-GSA-XX-09-DR-A-2109 P05 Proposed Ninth Floor Plan
TAH-ORM-ZZ-09-DR-A-12205 P02	222-GSA-XX-RF-DR-A-2110 P04 Proposed Roof Plan

TAH-ORM-ZZ-LG-DR-A-12206 P03	222-GSA-XX-B1-DR-A-2111 P04 Proposed Basement Plan
TAH-ORM-ZZ-AA-DR-A-12320 P02	222-GSA-XX-ZZ-DR-A-2210 P03 Proposed Section AA
TAH-ORM-ZZ-BB-DR-A-12321 P02	222-GSA-XX-ZZ-DR-A-2211 P03 Proposed Section BB
TAH-ORM-ZZ-WE-DR-A-12420 P03	222-GSA-XX-ZZ-DR-A-2301 P03 Proposed West Elevation
TAH-ORM-ZZ-EA-DR-A-12421 P03	222-GSA-XX-ZZ-DR-A-2300 P03 Proposed East Elevation
TAH-ORM-ZZ-SO-DR-A-12422 P02	222-GSA-XX-ZZ-DR-A-2302 P03 Proposed South Elevation