

124 Theobalds Road, London, WC1X 8RX
Town Planning Statement

On behalf of: Theobald Investment Ltd
24 June 2024

KAH/KHU/HSC/U0017407

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1 Executive Summary

1.1 This Town Planning Statement is submitted on behalf of Theobald Investment Limited (the “Applicant”) in support of an application for full planning permission for the refurbishment and extension of 124 Theobalds Road, London, WC1X 8RX (“the Site”).

1.2 The Proposed Development seeks to sensitively and sustainably refurbish and extend the existing building to provide high quality, sustainable workspace designed to meet changing office demands and to modernise the existing office accommodation.

1.3 Accordingly, full planning permission is sought for the Proposed Development as:


“Refurbishment and extension of the existing building to provide additional commercial, business and service use (Class E) including external alterations, introduction of a rooftop terrace, new hard and soft landscaping, provision of cycle parking, provision of publicly accessible café space, and other associated works.”

1.4 The Proposed Development will deliver several planning benefits, including:

- Contribution to the regeneration and transformation of the area;
- Sustainable reuse and repositioning of a building which no longer meets modern office user requirements;
- Delivering an uplift of 598 sqm (GIA) in high quality office floorspace;
- Financial contribution to Camden’s affordable housing fund via payment in lieu;
- Delivering sustainable development through improvements in energy efficiency;
- Introducing an additional 128 cycle spaces;
- High quality design, contributing to the wider townscape and local streetscape; and
- Contributing to the function and character of the area by reactivating the street frontages through opening up of historic ground floor apertures and the provision of a new publicly accessible café.



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- 1.5 The Applicant and design team have engaged with the London Borough of Camden (“LBC”) and the local community to inform the final design of the Proposed Development.
 - 1.6 This Town Planning Statement provides an assessment of the Proposed Development in planning terms in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which requires planning applications to be determined in accordance with the Development Plan unless material considerations otherwise.
 - 1.7 For the reasons and those set out in detail in this Statement, it is considered that the Proposed Development is in accordance with the policies of the Development Plan, when read as a whole, and as such the Application should be granted planning permission accordingly.

2 Introduction

- 2.1 This Town Planning Statement is submitted on behalf of Theobalds Investment Limited in support of an application for full planning permission for the refurbishment and extension of the existing building at 124 Theobalds Road, London, WC1X 8RX (“the Site”) which sits within the London Borough of Camden (“LBC”).
- 2.2 This Town Planning Statement sets out the town planning case in support of the application. In addition, it summarises the planning history of the site and assesses the Proposed Development in the context of relevant planning policies and guidance.
- 2.3 The proposals are described in greater detail in the Proposals section of this statement. In summary, full planning permission is sought for:
- “Refurbishment and extension of the existing building to provide additional commercial, business and service use (Class E) including external alterations, introduction of a rooftop terrace, new hard and soft landscaping, provision of cycle parking, provision of publicly accessible café space, and other associated works.”**
- 2.4 The Proposed Development has been informed by thorough analysis of the existing building, the Site’s immediate and wider context, and the Site’s history. The Proposed Development has adopted a retrofit-first approach to revitalise the existing building.
- 2.5 The Proposed Development seeks to provide high-quality new workspace which will feature best in class amenity provisions including generous cycle parking facilities, improved landscaping and public realm and a communal rooftop terrace. The Proposed Development also incorporates a cafe at ground floor level which will be open to the public.
- 2.6 The Applicant has engaged with LBC to discuss the office refurbishment proposals in the form of two pre-application meetings on 7th December 2023 and 16th May 2024.

2.7 The Applicant has also undertaken consultation with the local community, including a public exhibition event held on 3rd June 2024. Full details of this engagement are included within the Statement of Community Involvement, prepared by Quatro.

2.8 This Planning Statement is structured as follows:-

- Section 3 – Site and Surroundings;
- Section 4 – Planning History;
- Section 5 – Consultation;
- Section 6 – Proposed Development;
- Section 7 – Planning Policy;
- Sections 8-12 – Planning Considerations (Land Use, Design, Heritage and Townscape, Energy and Sustainability, and Other Planning Considerations);
- Section 13 – Section 106 Obligations and CIL; and
- Section 14 – Summary and Conclusions.

2.9 The Proposed Development has been designed by Orms Architects and is described in Section 6 of this Statement and within the submitted Design and Access Statement.

2.10 This Statement should be read in conjunction with the proposed plans and drawings; including the following documents which are submitted as part of this application

- Completed Application Form (ref. PP-11840270), prepared by Gerald Eve LLP
- Completed Ownership Certificate, prepared by Gerald Eve LLP;
- Additional CIL Information Form, prepared by Gerald Eve LLP;
- Drawings, prepared by Orms Architects:
 - Site Location Plan, prepared by Orms Architects;
 - Site Plan, prepared by Orms Architects;
 - Existing Plans, Elevations and Sections, prepared by Orms Architects;
 - Proposed Plans, Elevations and Sections, prepared by Orms Architects;
 - Demolition Plans, Elevations and Sections, prepared by Orms Architects;
 - Bay Studies, prepared by Orms Architects;

- Landscape plan, prepared by Orms Architects;;
- Design and Access Statement, prepared by Orms Architects;
- Sustainability Statement (including BREEAM Assessment), prepared by Orms Architects;
- Transport Statement (including Travel Plan and Delivery and Servicing Management Plan), prepared by Motion;
- Acoustic Assessment, prepared by Sandy Brown;
- Townscape, Heritage and Visual Impact Assessment prepared by KM Heritage;
- Sunlight and Daylight Assessment, prepared by GIA;
- Archaeological Assessment, prepared by PCA;
- Arboricultural Assessment, prepared by Landmark Trees;
- Ecology Statement (including Biodiversity Net Gain Assessment and UGF), prepared by The Ecology Practice;
- Energy Statement, prepared by Twin and Earth;
- Statement of Community Involvement, prepared by Quatro;
- Air Quality Assessment, prepared by Air Quality Plan;
- Flood Risk Assessment, prepared by London Structure Lab; and
- Surface and Foul Water Drainage Strategy, prepared by London Structure Lab.

2.11 This Statement provides a comprehensive review of national, regional, and local planning policy and guidance relevant to the proposals. It assesses the degree to which the proposals accord with policies of the Development Plan and takes other material considerations into account, in accordance with the requirements of Section 38(6) of the Planning and Compulsory Purchase Act 2004.

2.12 For the reasons and those set out in detail in this Statement, it is considered that the Proposed Development is in accordance with the policies of the Development Plan, and as such the Application should be granted planning permission accordingly.

3 Site and Surroundings

3.1 This section describes the Site's location and context in greater detail. It is described further in the Design and Access Statement, prepared by Orms Architects.

3.2 The Site

3.3 124 Theobalds Road ('The Site') is located in the London Borough of Camden (LBC) and covers an area of 0.24 hectares. The current building was completed in 1955 and comprises a basement, ground and eight upper floors with a total floorspace of approximately 11,937sqm. The top floor includes mezzanine plant areas. The Site fronts Theobalds Road to the south and is bounded by Boswell Street to the west and New North Street to the east.

3.4 The building was designed by Stanley Gordon Jeeves, an architect who collaborated on many landmark buildings in London. The quality of this building is evident from the use of the well detailed, Portland stone facing material.

3.5 The Site is not a statutory listed building, nor does it fall within a conservation area. However, Bloomsbury Conservation Area is in proximity and surrounds the Site to the north, east and west. Kingsway Conservation Area is also situated to the south of the Site.

3.6 The site is located within Protected Vistas - View 5A.2: Greenwich Park Wolfe statue to St Paul's Cathedral.

3.7 The site has excellent access to public transport with a Public Transport Accessibility Level ("PTAL") of 6b. Nearby underground stations include Chancery Lane (0.5 miles to the east of the Site), Holborn (0.5 miles to the south of the Site) and Russell Square (0.8 miles north of the Site).

3.8 The latest EA published flood zone map shows the Site falls within Flood Zone 1.

Surrounding Area

- 3.9 The Site is located within a mixed-use area in Holborn and is surrounded by several commercial (mainly office) uses and residential properties. There is also a retail cluster centred along Southampton Row and High Holborn which is mainly provided at ground floor level. In the Site's immediate vicinity, there are numerous buildings ranging up to 14 storeys in height.
- 3.10 There are several Statutory Listed buildings in the surrounding area of the Site. Numbers 43-47 Old Gloucester Street are all Grade II listed buildings and are situated to the west of the Site. Victoria House on Southampton Row is also a Grade II listed building located to the south of the Site.
- 3.11 The Tybalds Estate is located immediately to the north of the Site and has been subject to a few planning applications submitted for residential-led redevelopment in recent years.

4 Planning History

4.1 An overview of relevant planning history for 124 Theobalds Road is provided below.

4.2 In June 1993, full planning permission (ref. 9300313) was granted for

“The retention of a single storey office extension on the fifth-floor balcony and other minor alterations to the building.”

4.3 In August 2006, full planning permission (ref. 2006/2803/P) was granted for:

“External alterations to the existing office building comprising changes to the entrance portal on Theobalds Road elevation, reinstatement of windows on the Boswell Street, New North Street and North car park elevations; together with the repositioning of the New North Street car park entrance gates to facilitate the installation of 26 cycle parking racks and changes to the parking layout in the existing parking area.”

4.4 There have been several minor planning applications for the installation of chiller units, an air-conditioning plant, and new windows to the existing office building in recent years.

4.5 In January 2022, full planning permission (ref. 2021/2115/P) and advertisement consent (ref. 2021/3151/A) was refused for:

“Installation of a new phone hub unit following removal of existing kiosk as part of wider proposals to replace Infocus telephone kiosks.”

4.6 This was subsequently dismissed at appeal in January 2023.

4.7 In July 2022, a Certificate of Lawfulness (Proposed) (ref. 2022/1224/P) was granted for:

“Infill of existing atrium to provide additional office space.”

5 Consultation

- 5.1 This section summarises the outcome of the pre-application and consultation process and how the Proposed Development scheme has responded to comments received.
- 5.2 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.
- 5.3 This is reiterated by the National Planning Policy Framework (NPPF) which states that “Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre- application discussion enables better coordination between public and private resources and improved outcomes for the community” (Paragraph 38).
- 5.4 The development proposals have been subject to extensive consultation between November 2023 – June 2024. Those consulted include:
- The London Borough of Camden planning and design officers; and
 - Local residents and businesses.

Pre-application Discussions with LBC

- 5.5 The Proposed Development has evolved through a series of pre-application meetings with LBC planning and design and conservation officers since November 2023, with in person meetings taking place on 7th December 2023 and 16th May 2024.
- 5.6 Several iterations of the proposed design were subject to thorough review throughout the pre-application stage and the development proposals have evolved throughout this period to incorporate comments received in relation to design, wherever possible.
- 5.7 The key topics discussed at the initial pre-application meeting included proposed 390sqm GIA uplift and the feasibility of a single residential unit on site.

5.8 The initial pre-application response received on 4th January 2024 (ref. 2023/4586/PRE) can be summarised as follows:

- Increase in office and retail floorspace in growth areas is supported.
- Based on a GIA uplift of 390sqm, a policy compliant scheme would provide 195sqm of onsite housing. It was acknowledged that the uplift is small as part of this development and attempting to provide housing in the existing building seems to compromise the overall scheme and the benefits of providing high quality office accommodation.
- The removal of the 1990s additional are supported as they add little to the character of the buildings.
- The scale and massing of the extension sits comfortably within the building's proportions and retains its stepped façade character.
- Opportunity in the rear garden to provide green infrastructure, planting, and landscaping.

5.9 Several comments related to submission requirements for major GLA referable application. However, following this meeting it was confirmed with LBC Officers that the Proposed Development would not be GLA referable or classed as a 'major' development.

5.10 The Site sits within the backdrop of the protected view 'LVMF 5A.2 Greenwich Park: the General Wolfe Statue'. However, as agreed with officers, the Proposed Development is not referable as Site only falls within the background assessment area of the protected vista. The LVMF Directions 16 March 2012 states that *"the Direction under articles 10(3) and 27 of the Town and Country Planning (General Development Procedure) Order 1995 and dated 29 July 2010, for protecting the vista of St Paul's Cathedral from Greenwich Park, is cancelled."*

5.11 The key topics discussed at the second pre-application meeting included improved entrance design, window replacement, pavilion design update, cycle parking and GIA uplift.

5.12 Further detail on the design development of the proposals can be found in the Design and Access Statement prepared by Orms Architects.

Local Stakeholder Engagement

- 5.13 Following the pre-application discussions with the Council, the applicant also undertook public pre-application engagement relating to the Proposed Development, providing local stakeholders with the opportunity to comment on and influence the emerging proposals.
- 5.14 The methods of engagement have included:
- Contacting local stakeholders on 9th May 2024.
 - Meeting with Cllr Sue Vincent and Warner Brothers on 16th May 2024.
 - In-person Public Exhibition event on 3rd June 2024.
 - A dedicated project website (www.124theobalds.co.uk) which ran from 3rd June 2024 to 14th June 2024.
- 5.15 Further details of the engagement approach and activities undertaken to engage with local stakeholder and the community in relation to the proposals are set out in the the Statement of Community Involvement, prepared by Quatro.
- 5.16 Overall, the SCI demonstrates that a meaningful engagement process was undertaken in respect of the proposals, which has provided stakeholders with the opportunity to influence the Proposed Development.

6 Proposed Development

6.1 This Section should be read in conjunction with the Design and Access Statement which has been prepared by Orms Architects, which contains a full description of the Proposed Development and the rationale for its design, scale, layout, access and materiality.

6.2 For the avoidance of doubt, Full Planning Permission is sought for:

“Refurbishment and extension of the existing building to provide additional commercial, business and service use (Class E) including external alterations, introduction of a rooftop terrace, new hard and soft landscaping, provision of cycle parking, provision of publicly accessible café space, and other associated works.”

6.3 The Applicant’s vision for the Site is to retain as much of the existing structure as possible while revitalising the existing building in order to: improve the external appearance of the building; enhance its sustainability credentials, reintroduce an active ground floor; and meet changing office demands through the modernisation of the office accommodation and associated amenities.

6.4 The Proposed Development is summarised as follows (this includes works which would be secured via Section 278 Agreement with the Local Planning Authority):

- Provision of 598 sqm of additional commercial, business and service use (Class E) floorspace.
- Removal of low quality 1990s extensions including the buildings entrance to the front, the balcony and roof to the front, the 2nd floor rear balcony, the 5th floor enclosure, the atrium/glass roof and the plant enclosure roof.
- Omitting the north core and infilling the existing atrium at levels 6-8 to create more efficient floor plates.
- Extending the ‘Central Bay’ facade towards to street (Theobalds Road) to improve the building’s presence.
- A new Portland Stone infill to consolidate mass of North East corner.

- Activating the ground floor level by providing multiple entrances and reinstating windows and lowering some cills.
- Provision of amenity space at existing building setbacks, plus a new rear terrace at Level 8, a new communal roof terrace at Level 9, and a landscaped forecourt and rear garden, which will enhance biodiversity on site.
- A publicly accessible café space at ground floor level, with accessible ramps for access.
- Widening the vehicular access to the rear on (New North Street) and associated works to the crossover.
- Provision of new long and short stay office cycle parking with associated end of trip facilities.

Accommodation Schedule

6.5 The Gross Internal Area (GIA) Schedule for existing and proposed floorspace is provided in the table below:

Use	Existing	Proposed	Change
Class E	11,937 sqm	12,535 sqm	598 sqm
Total	11,937 sqm	12,535 sqm	598 sqm

6.6 The External Area (GEA) Schedule for existing and proposed floorspace is provided in the table below:

Use	Existing	Proposed	Change
Class E	12,876 sqm	13,443 sqm	567 sqm
Total	12,876 sqm	13,443 sqm	567 sqm

6.7 The cafe proposed at ground floor level falls within Use Class E.

Massing and Height

- 6.8 In terms of building height, the Proposed Development will result in a decrease of the maximum height by approximately 3.38m. The existing building height is 39.31m and the proposed height is 35.93m.
- 6.9 In terms of massing, it is proposed to extend the 'Central Bay' on the southern elevation to align with the new 'Feature Entrance'. This is a slight extension to improve the buildings street presence on Theobalds Road. The existing facade will be carefully deconstructed so the Portland Stone can be reused in the 'Central Bay'.
- 6.10 It is proposed to remove the atrium/glass roof and telecoms equipment to allow for the creation of a new south facing roof top pavilion.
- 6.11 The void between the existing Level 7 lift overrun and the rear of the building will be infilled with new Portland Stone construction. A small roof terrace will be provided at this level 8. It is worth noting the proposed changes in massing are minimal and sit within the existing building's envelope.

Elevations and Materiality

- 6.12 In terms of appearance, the Proposed Development presents an opportunity to completely renew and refresh the appearance of the building.
- 6.13 All proposed elevations show the replacement rooftop pavilion, existing windows replaced, blocked up windows opened, dropped cills, new entrance doors, new balustrades and existing vents removed.
- 6.14 In terms of the southern elevation there will be new Portland stone 'Central Bay' extension and 'Feature Entrance'. In addition, on the east elevation there will be a new Portland stone infill at Level 7 to unify and simplify the building line.

- 6.15 The lightwell on the west elevation will be refurbished to provide a new entrance to the cycle store, with ground-floor windows reinstated, lowered cills, new balustrading, and existing windows replaced.
- 6.16 The east lightwell will feature new access stairs and reinstate the covered lightwell. It will also feature full height windows and doors to the office space, with ground-floor windows reinstated, lowered cills, new balustrading and existing windows replaced.
- 6.17 In terms of the rear façade, the existing curtain wall system and Juliet balcony is proposed to be removed and replaced with a glass block wall inserted in the existing facade. The existing granite and metal cladding to the sides is proposed to be refurbished.
- 6.18 In terms of the main entrance on the south elevation, it is proposed to make this a 'Feature' double height entrance, utilising polished chrome detailing. The existing secondary entrance doors to the east and west of the main entrance will utilise the existing bronze doors.
- 6.19 In terms of the pavilion this will match the materiality of the existing building and feature rotated columns to match the main entrance.

Landscaping

- 6.20 The Proposed Development has sought to increase the provision of high-quality landscaping across the Site.
- 6.21 The proposed roof plan details the landscaped terraces at Levels 5-9. This includes the existing setback balconies located at levels 5 and 6 on the east and west elevations and the existing terraces that are located at level 7 on the south elevation. The existing building setbacks will provide improved outdoor amenity opportunities and increase biodiversity through the introduction of planters with soft landscaping.
- 6.22 Terraces are proposed at level 8 on the north elevation and level 9 on the southern elevation. The level 8 terrace and level 9 communal rooftop terrace will introduce additional greening

through the provision of planters. Seating will also be provided to enhance amenity provision on Site.

- 6.23 In terms of the proposals for the rear garden this incorporates a new sunken courtyard, new planters, along with new hard and soft landscaping.

Publicly Accessible Cafe

- 6.24 The Proposed Development incorporates a café in the southwest corner of the Site, with fully- accessible ramp access.

Sustainability Strategy

- 6.25 Enhancing the Building's sustainability offer has been a key driver for the design of the Proposed Development; not only in terms of the environmental credentials of BREEAM and life-time carbon reduction; but also enhancing the health and wellbeing of future occupiers. The Sustainability Strategy for the Proposed Development is set out within the Sustainability Statement prepared by Orms Architects.
- 6.26 In terms of whole life carbon, the Proposed Development will retain 95% of the GIA, 80% of the stone façade and 90% of structural elements.

Energy Strategy

- 6.27 The Strategy notes that whilst this is a minor refurbishment, and therefore no requirement to comply with London Plan carbon reduction targets, a concerted effort has been made to enhance the energy performance of the building in line with the London Plan energy hierarchy. This is discussed in further detail in the submitted Energy Strategy and Section 11 below.

Deliveries and Servicing

- 6.28 A Delivery and Servicing Management Plan has been prepared by Motion and is submitted in support of this application. The arrangements will provide a dedicated service bay for delivery vehicles up to 7m long in the rear garden. The existing rear entrance off New North Street is proposed to be widened, with associated amendments to the crossover.
- 6.29 A refuse vehicle cannot enter the site from New North Street. It is expected that the largest vehicle to be accessing and egressing the site is a 7m delivery van. Refuse vehicles and delivery vans longer than 7m will be required to park adjacent to the site access for loading/unloading activity. Single yellow lines are present on either side of New North Street and allow for vehicles to load/unload for a maximum of 40 minutes.
- 6.30 Refuse stores will be located at ground floor level and refuse collection will continue as per the existing arrangements for adjacent properties on New North Street.

Cycle Parking

- 6.31 The Site currently provides 42 spaces and 3 showers. The Proposed Development seeks to provide a total of 170 spaces (158 long stays and 12 short stay). The cycle parking arrangements are as follows:
- 66 x two-tier stands;
 - 8 x Brompton Lockers; and
 - 18 x Sheffield Stands.
- 6.32 The Proposed Development include the provision of 22 showers. The basement will also include 146 lockers.
- 6.33 The Proposed Development will provide a dedicated cycle entrance off Boswell Street. Direct access to the basement cycle centre will be provided via new set of stairs with cycle ramps.

The proposed cycle store can also be accessed via a lift from ground floor. Short stay and oversized cycle parking will be provided at ground level for easy access.

- 6.34 As noted within the Transport Statement, prepared by Motion, the Proposed Development results in a GIA uplift of 598 sq.m, which attracts the need for an additional 8 long-term cycle parking space and 1 short-stay space. As such the provision of an additional 128 space makes a considerable contribution to enhancing the active-travel offer for the retained existing building on site.

Car Parking

- 6.35 This is a car free development with the exception of one blue badge space provided to the rear of the Site. The driver will be able to access the site, turn on-site and egress the site in forward gear.

7 Planning Policy

- 7.1 This section of the Statement outlines the relevant national, regional, and local planning policy guidance documents against which the Proposed Development should be assessed, and the key to planning considerations.
- 7.2 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.
- 7.3 The statutory Development Plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 comprises:
- The London Plan, published in March 2021; and
 - The Camden Local Plan, adopted in July 2017.
- 7.4 The National Planning Policy Framework (December 2023), National Planning Practice Guidance (“NPPG”) and Camden Planning Guidance documents are material considerations.

National Planning Guidance

National Planning Policy Framework (NPPF)

- 7.5 The Ministry of Housing, Communities and Local Government (now the Department for Levelling-up Housing and Communities “DLUHC”) published the revised National Planning Policy Framework (“NPPF”) in December 2023.
- 7.6 The NPPF sets out the Government’s economic, environmental and social planning policies for England. It summarises in a single document all previous national planning policy advice. Taken together, these policies articulate the Government’s vision of sustainable development, which should be interpreted and applied locally to meet local aspiration.

7.7 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. The NPPF explains that the policies of the Framework, taken as a whole, constitute what the Government considers sustainable development to mean in practice.

National Planning Practice Guidance ('NPPG') 2021

7.8 In March 2014, the Department for Communities and Local Government launches the web-based planning practice guidance resource. This aims to provide planning practice guidance which is useable in an up-to-date and accessible manner.

7.9 The PPG outlines how government planning practice should be followed and interpreted in accordance with the principles of the NPPF. Regarding decision making, the guidelines set out in the PPG are a material consideration and accordingly, should carry weight in the determining of planning applications.

Regional Planning Policy

The London Plan

7.10 The London Plan is the overall strategic plan for Greater London, defined to include the 32 Boroughs and the City of London. The aim of the London Plan is to set out a framework to coordinate and integrate economic, environmental, transport and social considerations over the next 20 to 25 years. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas and forms part of the statutory development plan.

7.11 The London Plan is centred around 'Good Growth', with a focus on building strong and inclusive communities, making the best use of land, creating a healthy city, growing a good economy and increasing efficiency and resilience. The Plan recognises the key role of Central

London as a driver for London and the wider UK economy with the CAZ being critical in supporting growth.

7.12 The London Plan sets out the strategic functions of the CAZ. The strategic priorities for the CAZ as set out at Policy SD4 seek to enhance and promote the unique international, national and London-wide roles of the CAZ, supporting the distinct offer of the Zone based on a rich mix of local as well as strategic uses and forming the globally iconic core of one of the world's most attractive and competitive business locations.

Greater London Authority ("GLA") Guidance

7.13 The following GLA London Planning Guidance ("LPG") are also considered to be material to the determination of this application:

- Accessible London SPG (2014);
- Planning for Equality and Diversity in London SPG (2007);
- Character and Context SPG (2014);
- Air Quality Neutral LPG (2023);
- The Control of Dust and Emissions in Construction SPD (2014);
- Draft Sustainable Transport, Walking and Cycling (2022);
- Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy SPG;
- Optimising Site Capacity: A Design Led Approach LPG (June 2023);
- Urban Greening Factor LPG (February 2023); and
- Draft Fire Safety LPG (2022).

Local Planning Policy

Camden Local Plan (2017)

7.14 The Camden Local Plan was adopted in July 2017 and sets out how development will be managed within the borough. The Plan seeks to address a number of challenges; adapting to

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

Supplementary Planning Documents

7.15 The following Camden Planning Guidance ("CPG") documents are also considered to be material to the determination of this application:

- Amenity CPG 2021
- Air Quality CPG 2021
- Biodiversity CPG 2021
- Design CPG 2021
- Developer Contributions CPG 2019
- Energy Efficiency and Adaptation CPG 2021
- Employment Sites and Business Premises CPG 2021
- Planning for Health and Wellbeing 2021
- Town Centres and Retail CPG 2021
- Transport CPG 2021

Planning Policy Designations

7.16 In terms of site designations, The Site falls within the following designations in accordance with the Camden Local Plan policy proposals map (adopted July 2017 and updated in January 2021):

- Holborn Growth Area;
- Central London Area CLA;
- Protected Vistas - View 5A.2: Greenwich Park Wolfe statue to St Paul's Cathedral;
- Archaeological Priority Area – London Suburbs;
- The Central Activities Zone; and
- Holborn Growth Area.

Emerging Planning Policy

- 7.17 The Council have now commenced a review of their Local Plan.
- 7.18 The draft new Camden Local Plan sets out our vision for future development in Camden for the next 15 years and includes the planning policies and site allocations to help achieve this. It identifies how many new homes and jobs are needed to support Camden's population, and where and how they should be provided.
- 7.19 The Council consulted on the draft new Local Plan from 17 January to 13 March 2024. The Council are currently considering all the responses received and will publish an updated version of the Local Plan for further consultation later this year.
- 7.20 At the time of writing, the policies contained within the draft Local Plan carry no weight in the determination of this planning application.

8 Planning Considerations – Land Use

- 8.1 This section assesses the proposals against relevant national, regional, and local land use planning policies.

Principle of Development

- 8.2 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved.
- 8.3 Paragraph 123 of the NPPF states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 8.4 London Plan Policy GG2 seeks to create sustainable mixed-use places that make the best use of land. It requires those involved in planning and development to 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 (Part C) and apply a design-led approach to determine the optimum development capacity of sites (Part D).
- 8.5 London Plan Policy GG2 Part D highlights that proposals should use a design-led approach to determine the optimum development capacity of sites.
- 8.6 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.
- 8.7 London Plan Policy SD4 recognises the unique function of the CAZ and the need to balance and maintain its mix of strategic functions and local uses.

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

8.9 Local Plan Policy G1 sets out how the Council will create conditions for growth to deliver homes, jobs, and infrastructure by supporting development that makes the most efficient use of the site and support Camden's objectively assessed needs to 2031 of c.695,000sqm of office floorspace. The Council anticipate the most significant growth to be delivered through a concentration of development in the growth areas, including within Holborn's Growth Area.

8.10 The Local Plan's supporting text to Policy G1 sets out that the growth areas, including the Holborn Growth Area, are identified as being suitable for large-scale redevelopment or significant increases in jobs and homes, and are based around transport interchanges.

8.11 The Local Plan establishes the Council's aspirations for the Holborn area at paragraph 2.31. These include:

- provision of a mix of land uses, with offices and housing as the predominant uses; and
- provision of appropriate retail, food, drink and entertainment and service uses in the area's Central London Frontage in accordance with the supplementary planning document Camden Planning Guidance on centres, taking opportunities to introduce ground floor town centre uses where the continuity of the frontage is currently broken;
- development of a decentralised energy network;
- improvements to the street environment, in particular the pedestrian environment to and around Holborn Underground station;
- improved linkages and connections with the City of London, the Tottenham Court Road area and other neighbouring areas;
- making walking and 'way-finding' easier;
- the provision of improved cycling facilities, particularly for visitors;

- working with partners including TfL to relieve congestion at Holborn Underground station, including the Holborn station capacity upgrade;
- appropriate contributions to open space, community facilities, regeneration initiatives and employment and training schemes;
- high quality, sustainable design that respects its surroundings and conserves and enhances the area's heritage assets and wider historic environment; and
- improving community safety, including opportunities for crime and anti-social behaviour.

Assessment

8.12 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 previously developed urban land, which is well served by public transport. The site is located within the London Plan defined CAZ and Camden's Central London Area.

8.13 The proposals will provide the opportunity to increase employment floorspace. The proposals will also incorporate sustainable materials and design, where appropriate, which will result in a more energy efficient building.

8.14 The Proposed Development will therefore bring an outdated and inefficient building into use whilst also contributing to the provision of high-quality new workspace.

Employment and Office Use

8.15 The NPPF sets out the Government's commitment to securing economic growth and advises that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century. Paragraph 85 of the NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

- 8.16 London Plan Policy GG5 sets out principles for growing a good economy to conserve and enhance London’s global economic competitiveness and ensure that economic success is shared amongst all Londoners.
- 8.17 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.
- 8.18 London Plan Policy E1 states that improvements to the quality, flexibility, and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development. Part C is clear 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 supported and promoted.
- 8.19 London Plan Policy SD4 sets out how the strategic functions of the CAZ should be promoted and enhanced.
- 8.20 Local Plan Policy E1 seeks to ensure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for residents and businesses. The policy goes on to state that new office development will be directed to the growth areas, Central London and the town centres to meet expected demand of 695,000sqm by 2031.
- 8.21 Local Plan Policy E2 (Employment premises and sites) reiterates that the sites which are suitable for continued business use will be protected and the intensification of employment uses will be supported provided they are maintained or increased.

Assessment

- 8.22 Land use planning policies at every level support the intensification of business floor space in this location. The Proposed Development will deliver an additional 598 sqm of high-quality office space (Class E). The proposed office space has been designed for flexibly to cater for changes in future office requirements. Office floorspace is a key supporting function for

Camden's growing Knowledge Quarter and will contribute to the principle of clustering within the CAZ.

8.23 The Site has a PTAL Rating 6b (best) and is within the Camden's Central London Area and CAZ set out within the London Plan. Local Plan Policy E1 directs new office floorspace to the growth areas and Central London. As such, an increase in office floorspace in this location should be supported in principle.

8.24 In addition, the existing building is currently in office use and therefore the principle of Class E at the Site is already established.

Land Use – Mixed Use Policy

Policy Context

8.25 Local Plan Policy H1 aims to secure a sufficient supply of homes to meet the needs of existing and future households and will seek to exceed the target for additional homes in the borough by regarding self-contained housing as the priority land use of the Local Plan.

8.26 Local Plan Policy H2 states that, where non-residential development is proposed, the Council will promote the inclusion of self-contained homes as part of a mix of uses. In the Central London Area (where the site is located) where development involves additional floorspace of more than 200sqm (GIA), Camden will require 50% of all additional floorspace to be self-contained housing, subject to the following considerations:

- a) The policy is approached in two stages. The below criteria (a – e) if self-contained housing is required as part of the mix: the character of the development, the site and the area;
- b) site size, and any constraints on developing the site for a mix of uses;
- c) the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;

- d) whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
- e) whether the development is publicly funded or serves a public purpose.

8.27 The policy goes on to state, where [having considered the above criteria], it is considered housing is required as part of a mix of uses, this will (in the first instance) be sought on site, particularly where 1,000sqm (GIA) of additional floor space or more is proposed. If delivery does not occur on site, the delivery on an alternative site nearby will be sought, or exceptionally a payment-in-lieu.

8.28 In considering whether housing should be provided on site and the most appropriate mix of housing and other uses, the Council will consider criteria a – e, as listed above and the following additional criteria:

- f) The need to add community safety by providing an active street frontage and natural surveillance;
- g) The extent of any additional floorspace need for an existing user;
- h) The impact of a mix of uses on the efficiency and overall quantum of development;
- i) The economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- j) Whether an alternative approach could better meet the objectives of this policy and the Local Plan.

Assessment

8.29 As set out in Policy H2, the application site falls in the Central London Area, whereby development which proposes additional floorspace of more than 200sqm, are required to provide 50% of all additional floorspace as self-contained housing. The Proposals seek to

provide more than 200sq.m GIA uplift; with an uplift of 598 sqm, therefore Policy H2 would require 299 sqm of housing.

8.30 The Applicant has explored the possibility of providing residential on site, this study is set out in further detail within the Design and Access Statement. The Proposed Development is considered against the criteria within Policy H2 below and it is concluded that provision of residential use on-site should not be required.

8.31 Responses to the relevant Camden Local Plan Policy H2 criteria are as follows:

a) The character of the development, the site, and the area - In terms of the character of the development, the Proposed Development seeks to refurbish the existing office building to provide a more sustainable and efficient commercial building. The Site falls within the CAZ, Holborn Growth Area and Central London Area where commercial uses are a priority. The Site is in office use, and it is sought to retain this character by retaining a single commercial use at the building, with the addition of a publicly accessible café at ground floor level to activate the ground floor. The building was designed as a high-quality commercial headquarters building and should remain as such. Introducing a small amount of low-quality residential compromises the aspirations of a best-in-class commercial space.

b) Site size, and any constraints on developing the site for a mix of uses - Residential development would reduce the size of office space available and would require amendments the existing floorplates, which are designed for commercial use and are not readily adaptable for residential use. The delivery of residential accommodation has been investigated and there were several design limitations to achieving this which are set out in the Design and Access Statement.

The development would be unable to provide an acceptable level of residential amenity. It would lack appropriate sunlight/daylight, privacy, and amenity space. Facade amendments would be required to provide adequate daylight and private outdoor space; however, this would severely harm to the building's character and high-quality design.

The requirement for a separate residential core, entrance and supporting facilities would create an inefficient layout for both residential and office uses. The ground floor would be taken up by supporting space for cycles, bins and plant which would result in a loss of valuable floorspace. This would also inactivate the façade on the eastern elevation at ground floor level, which goes against what this development is seeking to achieve.

Due to the site constraints, the provision quality of residential accommodation provided on site would be poor. Furthermore, it is considered that the provision of residential units on Site would compromise the quality of the office refurbishment and extension scheme.

d) whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses – any residential provision would need to be at the same level as office floorspace. Accordingly, there is the potential for disruption across the uses.

f) the need to add to community safety by providing an active street frontage and natural surveillance – if a new residential entrance was required, this would impact the active frontage provided at ground floor level and the public realm enhancements provided as part of the Proposed Development. A residential ground floor would be blank, given the need to provide adequate bins and cycle storage at ground level.

h) the impact of a mix of uses on the efficiency and overall quantum of development –The provision of residential floorspace in this location would decrease the commercial floorspace within the CAZ, Holborn Growth Area and Central London Area. The housing requirement would be approximately 2 residential units, resulting in a low efficiency of 43%. This is mainly due to the residential requirement for a separate entrance, core, bike and bin store.

j) Whether an alternative approach could better meet the objectives of this policy and the Local Plan – The Applicant is an owner-investor and owns only this one office building in LBC. They do not have the necessary experience or knowledge for delivering housing, nor do they have the mandate to purchase a further site to be developed for residential use. Therefore, a payment in lieu (PIL) contribution to the borough would be the only achievable option.

8.32 Overall, the proposed 598 sqm uplift is a small amount of floorspace in the context of the entire existing building which is 11,937 sqm and falls entirely within Class E use. Attempting to provide residential accommodation within the existing building would comprise the success of the overall scheme and the benefits of providing high quality office accommodation in such a sustainable location.

8.33 As highlighted above, the optimum way to meet the Local Plan objectives and that of Policy H2 would be to make a payment in lieu (PIL) contribution to the borough which could then be used to deliver affordable housing at more appropriate sites in the Borough. Office use is another priority land use in Camden and the provision of 598 sqm of additional office floorspace in the Holborn Growth Area, Central Activities Zone and Central London Area should be wholly supported.

Land Use – Retail


8.34 London Plan Policy E9 states that a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported. It adds that development proposals should support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel.

8.35 At a local level, Camden Local Plan Policy E1 (i) recognises the importance of other employment generating uses, including retail uses.

8.36 Camden's Town Centres and Retail CPG states that food, drink and entertainment such as cafes, restaurants, bars and pubs are an important part of the and offer of Camden's centres and contribute to their vibrancy and vitality.

Assessment

8.37 The Proposed Development incorporates a publicly accessible café located in the southwest corner of the site. It will be fully accessible through the provision of a ramp. The café will



create an active frontage at ground floor level and will make a positive contribution to the street scene. The proposed café will also provide much needed amenity space which can be utilised by occupiers of the building as well as the local community.

- 8.38 It is considered that the café will complement the offices above and provide much needed amenity for the Local community in line with London Plan Policy E9 and Camden Local Plan Policy E1.

9 Planning Considerations – Design

- 9.1 The Section considers the Proposed Development against relevant national, regional and local design policy and guidance. This Section should be read alongside the Design and Access Statement, prepared by Orms Architects.
- 9.2 The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 131 states good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 9.3 Paragraph 135 of the NPPF seeks to ensure developments function well and add to the overall quality of the area, are visually attractive, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site and create places that are safe, inclusive and accessible.
- 9.4 London Plan Policy D2 states that the density of development should be proportionate to the site's connectivity and access to public transport.
- 9.5 London Plan 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.
- 9.6 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. The design and access statement should explain the approach taken to these design issues.

- 9.7 London Plan Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design. Design and access statements for development proposals should include an inclusive design statement.
- 9.8 Camden Local Plan Policy D1 seeks to secure high quality design in development by requiring development to respond to local character and context, be highly sustainable in design and construction, integrating well to the surrounding streets and townscape, comprises high quality architecture, is accessible for all and designed to minimise crime and anti-social behaviour.
- 9.9 Camden Local Plan Policy C6 seeks to promote access for all by expecting all buildings and places to meet the highest standards of accessibility and inclusive design.
- 9.10 Further detailed design guidance is set out within the Design CPG published in March 2019.

Assessment

- 9.11 The Proposed Development has been designed by Orms Architects to an exemplary standard and architectural detail with careful and appropriate consideration of the host building and its surroundings.
- 9.12 The building was originally designed by Stanley Gordon Jeeves, an architect who collaborated on many landmark buildings in London. The quality of this building is evident from the use of the well detailed, Portland stone facing material. The Proposed Development seeks to enhance the visual interest of the original design by returning it to a more streamlined and simple form.
- 9.13 In terms of the surrounding area the Site is within proximity of Bloomsbury Conservation Area and Kingsway Conservation Area, which the proposals have been sensitive to.
- 9.14 In the Site's immediate vicinity, there are numerous buildings ranging up to 14 storeys. The proposed reduction in height of the existing building and removal of the glass roof and

telecoms equipment will be replaced with the rooftop pavilion, allowing the Proposed Development to sit comfortably within its surrounding context and townscape in line with Camden Local Plan Policy D1.

- 9.15 In terms of massing the building sits comfortably within the existing envelope of the building and will therefore not impact the surrounding residential amenity.
- 9.16 The Proposed Development reflects the materiality of the existing building. It is intended for the proposed 'Central Bay' to utilise the Portland stone removed from the front elevation. This will also be case with the east elevation at Level 7. The rooftop pavilion will also reflect the materiality of the rest of the building. The extensions have been designed to complement the original building character and appearance by utilising the same materials.
- 9.17 The proposals include a full window system replacement to improve the buildings thermal performance. The windows will incorporate openable vents for mixed mode ventilation and improved sightlines (i.e. thinner frames). Thus, responding to the requirements for providing highly sustainable design and high-quality architecture in line with Camden Local Plan Policy D1.
- 9.18 Opening of historic windows at ground floor level and introduction of cafe will create active-frontages which will minimise crime and anti-social behaviour through activating street presence. In addition, the café will allow the building to better integrate with the surrounding streets.
- 9.19 In accordance with London Plan Policy D5 and Camden Local Plan Policy C6 the Proposed Development will meet the high standards of accessibility and inclusive design.

10 Planning Considerations – Heritage and Townscape

- 10.1 This section considers the Proposed Development against relevant national, regional and local heritage planning policy and guidance relating to designated heritage assets, archaeology and townscape. This section also considers the Proposed Development in respect of townscape views and impact on nearby heritage assets.
- 10.2 A full analysis of the impact of the Proposed Development on designated heritage assets is included within the submitted Heritage and Townscape, Visual Impact Assessment (“HTVIA”), prepared by KM Heritage and submitted as part of the application.

Policy and Statutory Context

- 10.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 10.4 The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 131 states good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 10.5 Paragraph 135 of the NPPF seeks to ensure developments function well and add to the overall quality of the area, are visually attractive, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site and create places that are safe, inclusive and accessible.
- 10.6 Paragraph 205 of the NPPF states 205 that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should

be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

- 10.7 London Plan HC1 Part C states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. 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.
- 10.8 London Plan Policy HC1 Part D makes it clear that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.
- 10.9 London Plan Policy HC3 states that that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view. Supporting paragraph 7.3.1 continues by saying development can make a positive contribution to the views and this should be encouraged, but where development is likely to compromise the setting or visibility of a key landmark should be resisted.
- 10.10 Camden Local Plan Policy D2 states that the Council will preserve and where appropriate, enhance Camden's rich and diverse heritage assets and their settings. In respect of designated heritage assets, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage assets unless the public benefits of the proposal convincingly outweigh that harm.

Heritage Assessment

- 10.11 The THVIA prepared by KM Heritage confirms that the Site has no heritage designations. Therefore, there is no direct physical effect from the Proposed Development on any heritage asset either designated or non-designated.
- 10.12 The THVIA notes that the Bloomsbury Conservation Area is in proximity and surrounds the Site to the north, east and west and the Kingsway Conservation Area is situated to the south of the Site. The Proposed Development has been designed to be sensitive to the surrounding context and to not negatively impact upon the setting of the Conservation Areas.
- 10.13 As the Site does not form or fall into the direct setting of any Listed building, therefore is no effect upon the setting of any Listed building.
- 10.14 The Proposed Development is therefore in accordance with London Plan HC1 and Camden Local Plan Policy D2 which seeks to protect heritage assets and their settings.

Townscape Assessment

- 10.15 The THVIA sets out that the Site falls within the backdrop of one of the London View Management ('LVMF') Landmark Viewing Corridor protected views: 'LVMF 5A.2 Greenwich Park: the General Wolfe Statue'. However, due to the fact the existing building will be decreasing 3.38m as a result of the Proposed Development, there will be no change in the building status/the protected view and therefore the view will remain as existing. The proposals would therefore achieve the expectations of London Plan Policy HC3.
- 10.16 It adds that the Proposed Development will remove the 1990s extensions which will enhance the visual interest of the original design by returning it to a more streamlined and simple form.

- 10.17 The THVIA considers the rooftop pavilion is modest in the context of the surrounding townscape and will contribute positively to the local skyline in a way that the current building top does not.
- 10.18 The street-level experience of the building greatly improved by re-opening blocked-up windows and the new 'Feature' entrance to be clearer and more welcoming than the existing arrangement. This will provide improved activation at street level.
- 10.19 The HTVIA sets out the 11 townscape views of the site, analysing the as-existing situation and what is proposed. These 11 views have been discussed and agreed with the Council during the pre-application process. The HTVIA set out that in each of these views, where change may occur, these changes are positive.
- 10.20 The HTVIA concludes that the Proposed Development will have a positive effect upon townscape significance and quality because of the sympathetic and high-quality architectural interventions proposed. The Proposals achieve the design policy objectives as set out in the NPPF, London Plan and the Camden Local Plan.

Archaeology

- 10.21 The Site lies within the Tier II Archaeological Priority Area (APA), designated 2.11: London Suburbs, which has revealed a wealth of information including prehistoric and roman remains, right up to the 18th century. An Archaeological Desk-Based Assessment of the Site's history up to and including the bomb damage to of WWII, has been prepared by PCA.
- 10.22 The Assessment sets out that the Site was undeveloped open ground until the late 18th century or 19th century when residential properties were built. The 20th century saw the demolition and clearance of the residential properties and significant bomb damage following the war. The construction of large commercial buildings following the war with associated basements, likely caused considerable disturbance to potential archaeological deposits. Previous impact on the Site is therefore considered high.

- 10.23 The Assessment continues that the Site has witnessed continuous occupation with terraced houses from the late 17th century onwards and then by large scale commercial offices from 1913. This implies that archaeological deposits, may have been truncated away by the later construction phases. It adds that the area also suffered heaving bombing during the war which may have had an effect on deposits being truncated away by later construction phases.
- 10.24 In relation to the impact of the Proposed Development, alterations have been aimed at minimising any below ground disturbance. All ground works will be carried out within the area of influence of the 1990s construction of the current building. The ground floor make-up will not be altered, and there will be no piling or underpinning. The report concludes the impact of the Proposed Development on any surviving archaeological deposits is considered to be low.
- 10.25 The Proposed Development is therefore in accordance with London Plan Policy HC1 Part D which seeks to ensure proposals identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.

11 Energy and Sustainability

- 11.1 This section considers the Proposed Development against relevant planning policy regarding energy and sustainability.
- 11.2 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.
- 11.3 The NPPF sets out the Government’s overarching planning policies regarding the delivery of sustainable development through the planning system. Chapter 14 of the document identifies the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 11.4 In accordance with national level objectives, the London Plan sets out the Mayor’s vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 11.5 London Plan Policy SI2 states that major development should be net zero carbon by achieving reductions in greenhouse gases in operation and through the energy hierarchy of; “be lean, be clean, be green, be seen”. Policy SI2 Part C of the policy sets out that a minimum on site reduction of 35% is required for major development, 15% of which should be achieved through energy efficiency measures for non-residential development.
- 11.6 London Plan Policy SI4 seeks to ensure developments minimise the adverse impacts on Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. It requires major developments to demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems.

- 11.7 London Plan Policy SI7 supports reducing waste and supporting the circular economy to support resource efficiency.
- 11.8 In 2019, Camden declared a climate and ecological emergency and subsequently published a Climate Action Plan 2020-2025, which outlines a programme of projects and activities for the council to achieve net zero by 2030.
- 11.9 Camden Local Plan Policy CC1 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.
- 11.10 Camden Local Plan Policy CC2 requires all development to be resilient to climate change by adopting appropriate climate change adaptation measures. It adds that the Council will promote sustainable design and construction measures. The Council expects non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEM assessments.
- 11.11 Camden Local Plan Policy CC3 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.
- 11.12 In January 2021 LBC updated the Camden Planning Guidance ‘Energy Efficiency and Adaptation’ to ensure that the Council’s commitment to reducing carbon emissions is achieved.
- 11.13 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.

Energy Strategy

- 11.14 An Energy Strategy has been prepared by Twin & Earth in support of this planning application. The Strategy notes that whilst this is a minor refurbishment and there is no requirement to comply with London Plan carbon reduction targets, every effort has been made to enhance the energy performance of the building in accordance with London Plan carbon targets and in line with the energy hierarchy.
- 11.15 The Energy Strategy states that carbon reduction for the extension and refurbishment parts have been shown separately as there are different baselines. For the extension the baseline is a Part L2A 2021 compliant development. The baseline is therefore the Target Emission Rate (TER) from the final proposed building specification. For the refurbished areas, baseline CO2 emissions have been generated assuming the notional specification for existing buildings, shown in Appendix 3 of the GLA guidance (June 2022).
- 11.16 The Energy Strategy has been developed following the energy hierarchy of “Be Lean, Be Clean, Be Green, Be Seen” as set out within London Plan Policy S12.
- 11.17 In terms of ‘Be Lean’ the following measures are proposed so the Proposed Development uses less energy and manages demand during operation:
- provision of openable windows providing natural ventilation.
 - replacement of the majority of windows.
 - high levels of insulation in the new build extension.
 - low energy lighting and lighting occupancy controls. hot water secondary circulation limited to high usage areas.
- 11.18 In terms of ‘Be Clean’, it is understood that there are no existing or planned heat networks in the vicinity of the Site which the development could connect to. Space has been allocated at basement level for future plant that will allow the development to be connected to a future district heating network.

11.19 In terms of 'Be Green' the following measures are proposed to maximise the opportunities for renewable energy production, storage and use on site:

- Air source heat pumps to provide heating and cooling.
- Air source heat pumps to provide domestic hot water to the basement. Point of use electric water heaters in office areas.

11.20 The Strategy confirms that a total 21% carbon emissions reduction against the GL's Baseline (A Parl L 2021 compliant development for new construction and the GLA's Baseline for existing areas) after demand reduction (Be Lean), energy efficient supply (Be Clean) and incorporation of renewable technologies, including rooftop PV panels (Be Green).

11.21 Overall, the Proposed Development has sought to significantly improve the energy efficiency of the building. The proposals also demonstrate compliance with London Plan Policy SI2 which sets out the energy hierarchy.

Overheating

11.22 The Energy Strategy includes details on the measures proposed to minimise the risk of overheating. The Energy Strategy confirms the development has been designed around passive measures and limiting internal heat gains to minimise the need for cooling.

11.23 The approach to the design has followed the cooling hierarchy set out in London Plan Policy SI 4. The measures are as follows:

- Reducing the amount of heat entering the building through new glazing, high performance low g-value windows and glazed doors, and urban greening.
- Minimising internal heat generation through energy efficient design via energy efficient lighting and controls and a heating distribution system to limit losses.
- Managing heat within the building through exposed internal mass and high ceilings.
- Providing passive ventilation through openable panels or office areas.

- Providing mechanical ventilation. All supply and extract mechanical ventilation systems will be fitted with a summer bypass on the heat recovery system for summer
- Providing active cooling systems. It is proposed that a centralised air source heat pumps will be installed to provide active cooling.

11.24 In terms of the developments approach to minimising cooling energy demand; this has resulted in a significant reduction over the notional building, achieving a reduction of 72%.

Sustainability Strategy

11.25 A Sustainability Statement has been prepared by Orms Architects in support of this application. The Statement sets out the scheme's sustainability targets, which include:

- Achieving BREEAM Excellent;
- Targeting NABERS 4.5* to 5.0* (with modelling to commence at Stage 3); and
- WELL-enabled building.

11.26 In terms of BREEAM, Camden Local Plan Policy CC2 expects non-domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM assessments. A pre-assessment has been completed for the BREEAM 2014 Refurbishment and Fit Out scheme. However, during design development, the scheme exceeded 500sqm GIA gain, which means that the project must now pursue Bespoke Certification. The Bespoke checklist has been produced by BRE and has been reviewed for compliance. The project is currently targeting Excellent.

11.27 In terms of net zero operational carbon, the 'Be Lean, Be Green, Be Clean' hierarchy set out in the London Plan has been followed and 21% reduction over Part L is achieved. With regards to net zero embodied carbon, most of the existing building is being retained with a series of small extensions to provide additional floorspace.

- 11.28 The development has sought to provide social, health and wellbeing benefits with the provision of enhanced end of journey facilities to support active transport, a gym/fitness suite, as well as improved amenities and facilities. BREEAM includes several credits which relates to health and wellbeing. A WELL Pre-assessment has been undertaken and the building is being developed as 'WELL – enabled' so this certificate could be progressed.
- 11.29 In terms of transport the site is centrally located with excellent transport links. The proposals also include increased cycle parking provision and end of journey facilities to encourage active travel.
- 11.30 In term of ecology, the Proposed Development will increase biodiversity on site through increased landscaping. As the Proposed Development is not a major development, UGF is not require. Despite this it has been calculated at 0.23. In relation to BNG, the onsite baseline vegetation accounts for less than 25sqm and the development is therefore subject to the de minimis exemption Despite this, BNG has been assessed and the Proposed Development achieves significant biodiversity net gains.
- 11.31 With regards to water efficiency the targets have been set by BREEAM. The Proposed Development includes blue roofs on the Level 7 front terraces and at Level 9. In addition, rainwater harvest tanks are proposed in the basement. The proposals in line with Camden Local Plan Policy CC3 which seeks to reduce flood risk and maximise water efficiency through the use of Sustainable Urban Drainage Systems.

12 Other Planning Considerations

- 12.1 This section provides an assessment of other relevant material considerations including daylight, sunlight and amenity, ecology and landscaping; transport, car and cycle parking; deliveries, servicing and waste; and noise and air quality.

Daylight, Sunlight and Amenity

- 12.2 London Plan Policy D13 introduces the Agent of Change principle which seeks to manage noise and other potential nuisances through good design and locating uses in appropriate locations.
- 12.3 Camden Local Plan Policy A1 sets out how the Council will manage the impact of development to protect the quality of life of occupiers and neighbours. The policy states that planning permission will be granted unless it causes unacceptable harm to residential amenity. To protect residential amenity, the Council will consider:

- Visual privacy and outlook;
- Sunlight, daylight and overshadowing;
- Artificial lighting levels;
- Transport impacts;
- Construction phase impacts
- Noise and vibration levels;
- Odour, fumes and dust;
- Microclimate;
- Contaminated land; and
- Impact upon water and wastewater infrastructure.

Assessment

- 12.4 A Daylight and Sunlight Assessment has been prepared by GIA in support of this application. The Assessment confirms that proposed changes in massing are minor and sit almost within

the silhouette of the existing property. An indicative analysis has been undertaken to provide a valuable insight into potential changes in natural light amenity.

12.5 In terms of surroundings, the Site is bound by Theobalds Road to the south, New North Street to the east, Boswell Street to the west and residential housing to the north.

12.6 To assess the potential light impact on neighbouring buildings, Point 2 have used a VuCity digital 3D model with GIA's Phoenix app to insert windows on the relevant facades.

12.7 Point 2 have identified several commercial properties to the south of the Proposed Development. These are considered less sensitive to changes in daylight and sunlight so have not been assessed. Residential properties have been identified to the north. These properties have a very limited potential to experience changes in daylight and sunlight. Despite this, Point 2 have considered the impact on the residential properties. The residential properties considered include

- Falcon, Old Gloucester Street;
- Richbell, 11 Boswell Street;
- Boswell House;
- Springwater, New North Street; and
- Windmill, New North Street.

12.8 It should be noted that four of the residential properties have consent for extensions so both the existing and contested neighbouring properties are included in the analysis.

12.9 Point 2 set out that the analysis demonstrates that the proposed small changes in massing will not cause BRE Breaches (VSC and APSH) to neighbouring residential properties. This is due to the minor nature of the changes in massing and the orientation of the residential neighbours relative to the development.

12.10 As a result, the Proposed Development has considered London Plan D13 and Camden Local Plan Policy A1 which seeks to ensure proposed developments to not cause unacceptable harm to residential amenity.

Transport

12.11 Chapter 9 of the NPPF sets out the Government's policies with regards to Transport. It sets out that transport issues should be considered from the earliest stage of development proposals so that potential impacts on the transport network can be addressed, opportunities from existing and proposed transport infrastructure are realised, opportunities to promote walking, cycling and public transport use are identified and pursued, environmental impacts can be assessed and considered.

12.12 London Plan Policy T1 set out the Mayor's overarching approach to Transport Strategy in London and requires that development makes the most effective use of land by reflecting its connectivity and accessibility by existing and future public transport, walking and cycling route.

12.13 London Plan Policy T2 sets out the Mayor's objective for 'Healthy Streets' and requires that development proposals demonstrate how they will support the 'Healthy Streets' initiative, reduce the dominance of vehicles, be permeable by foot, cycle, and public transport network.

12.14 London Plan Policy T4 states that transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. It adds that transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. It continues, Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance

- 12.15 London Plan Policy T5 of the London Plan sets out minimum cycle parking standards for new developments. For office, Table 10.2 requires office (Class B1) uses, 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.
- 12.16 London Plan Policy T5 Part B requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Part E states where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standard
- 12.17 London Plan Policy T6 states that car free development should be the starting point for all development proposals in places that are well connected by public transport.
- 12.18 Camden Local Plan Policy T1 seeks to promote sustainable transport by prioritising walking, cycling and public transport in Camden by supporting public realm improvements and the pedestrian environment, promoting cycling and providing high quality parking and end of trip facilities in developments. Policy T2 of the Local Plan requires all new development in the Borough to be car free.
- 12.19 The Transport CPG published in March 2019 provides detailed guidance relating to deliveries and servicing, cycle parking and end of trip facilities.

Assessment

- 12.20 In line with London Plan Policy T4, a Transport Statement has been prepared by Motion and is submitted with this application. The Site has excellent public transport connectivity with a PTAL rating of 6b. The Proposed Development car free within the exception of one blue badge space in accordance with London Plan Policy T6 and Camden Local Plan Policy T2.
- 12.21 In terms of pedestrian and cycle access this will be from the existing access on New North Street. The proposed cycle store in the basement will be accessed directly off Boswell Street

via a new set of stairs to the basement with a cycle gully. The cycle store in the basement will also be accessible from the lifts at ground floor level. In terms of vehicle access, this will also be via the existing access on New North Street. It is expected that the largest vehicle to be accessing and egressing the site is a 7m delivery van and it is proposed that the gates and associated dropped kerb will be widened on New North Street

- 12.22 In terms of cycle parking provision, the current building provides 42 spaces for 11,937 sqm (GIA) of office space. The Proposals are to provide an uplift in floor area of 598sqm, therefore attracting the need for 9 additional cycle parking spaces.
- 12.23 The Proposed Development will however exceed this with the proposals providing 158 long-stay and 12 short-stay cycle parking spaces are to be provided, totalling to 170 cycle parking spaces. This over provision will ensure the retained building benefits from a considerable uplift in cycle parking compared to the status quo. The cycle parking provision is expected to be sufficient to cover future cycle parking demands for the entire building, this is detailed Cycle Parking Technical Note appended to the Transport Statement.
- 12.24 The Transport Statement sets out the trip generation associated with the existing and Proposed Development. It concludes that the net changes will not impact on the local highway network, in particular the public transport given the site is located within a PTAL 6b zone.
- 12.25 A Travel Plan has also been prepared by Motion, which can be found appended to the Transport Statement. The Travel Plan sets out a series of measures that will be implemented to support the use of active and sustainable modes of transport for trips to and from the development in line with London Plan Policy T4.

Deliveries, Servicing and Waste

- 12.26 London Plan Policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not

possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night-time.

- 12.27 London Plan Policy D3 states that development should facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users.
- 12.28 Camden Local Plan Policy A1 sets out that the Council will seek to resist development that fails to adequately assess and address transport impacts affecting communities, neighbours and the existing transport network, through looking at and considering Transport Assessments, Travel Plans and Delivery and Servicing Management Plans.

Assessment

- 12.29 In accordance with London Plan Policy T7 and Camden Local Plan Policy A1, a Deliveries and Servicing Management Plan has been prepared by Motion is submitted. Please note this can be found appended to the Transport Assessment.
- 12.30 The Delivery and Servicing Management Plan has been prepared to ensure that delivery and servicing activity associated with the Proposed Development can take place in a safe, efficient and sustainable manner.
- 12.31 The Proposed Development is predicted to generate between 2 and 4 two-way HGV/LGV movements in the peak hours and around 48 two-way LGV/HGV movements daily. This is a minor change to the servicing demand from existing.
- 12.32 In terms of servicing arrangements, there will be dedicated service bay for delivery vehicles up to 7m long in the rear garden. The existing rear entrance off New North Street is proposed

to be widened, with associated amendments to the crossover. It is expected that the largest vehicle to be accessing and egressing the site is a 7m delivery van.

- 12.33 It should be noted a refuse vehicle cannot enter the Site from New North Street. Refuse vehicles and delivery vans longer than 7m will be required to park adjacent to the site access for loading/unloading activity. Single yellow lines are present on either side of New North Street and allow for vehicles to load/unload for a maximum of 40 minutes.
- 12.34 The Delivery and Servicing Management plan confirms the site management team will liaise with occupiers to manage the arrival of deliveries with the aim of avoiding deliveries during peak hours on the highway network and to avoid peaks in delivery activity on site as per London Plan Policy T7.
- 12.35 The Proposed Development will operate in the same way as existing in relation to refuse servicing. It is considered that the Proposed Development will have a very limited impact on the existing servicing arrangements.

Landscape, Public Realm and Ecology

- 12.36 London Plan Policy G1 Part D requires that development proposals include appropriate elements of green infrastructure, such as street trees, green roofs, and natural or semi-natural drainage features.
- 12.37 London Plan Policy G5 states Major development proposals should contribute to urban greening as part of development proposals and encourages greening measures to act as fundamental elements of the site and wider building design. For predominantly commercial development, it sets a target urban greening factor score of 0.3. The supporting text at paragraph 8.5.4 states this policy is only applicable for major applications.

- 12.38 London Plan Policy G6 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.
- 12.39 London Plan Policy D5 requires development proposals including for public realm, to achieve the highest standards of accessible and inclusive design.
- 12.40 Camden Local Plan Policy A2 seeks to protect, enhance and improve access to parks, open space and green infrastructure. The Council will seek to secure new and enhanced open space provision through Section 106 Contributions and the Community Infrastructure Levy by applying a standard of 0.74 sqm per commercial occupier. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of on site or off-site provision.

Assessment

- 12.41 An Ecology Statement, prepared by The Ecology Practise is submitted with this application which includes a Biodiversity Net Gain Assessment and Urban Greening Factor Assessment.
- 12.42 The Ecology Statement confirms there were no nesting birds present during the site survey and no evidence of historical nesting was found. It adds that overall, the building offered limited habitats for nesting birds however some of the flat roof areas could provide suitable opportunities for birds (e.g. pigeons) to nest during the nesting season. It provides a series of recommendations to protects birds during the breeding period.
- 12.43 In terms of Biodiversity Net Gain, the onsite baseline vegetation accounts for less than 25sqm and the development is therefore subject to the de minimis exemption. However, it is good practise to secure measurable net gains for biodiversity and has therefore been assessed. The Statement concludes that the landscape proposals will result in a significant Biodiversity Net Gain increase at the Site. The total net percentage change would be 12205.44%. Thus,

the proposals are in accordance with London Plan Policy G6 which requires development proposals to aim to secure net biodiversity gain.

- 12.44 The Proposed Development has sought to maximise the provision of greening across the site with approximately 500m² of ground landscaped areas and 700m² of roof terrace landscaped areas provided. In terms of the urban greening factor a score of 0.23 has been calculated. The London Plan Policy G5 target of 0.3 for commercial development is applicable to major applications only however the applicant will continue to explore opportunities for further increases to the greening during the next stages of design development.

Trees

- 12.45 Camden Local Plan Policy A3 seeks to protect and where possible secure existing trees and vegetation. The Council will resist the loss of trees and vegetation, require trees and vegetation to be protected during construction and demolition, expect replacement trees to be provided where there is a loss and incorporate additional trees and vegetation into proposals where possible.

Assessment

- 12.46 Arboricultural Assessment, prepared by Landmark Trees highlights that there are 12 trees on adjoining land outside of the application boundary that are within close proximity of the development and need to be assessed. The Assessment confirms the majority of the trees are moderate to low quality.
- 12.47 The Assessment concludes the proposals would have a very low impact on the trees identified and adds that no loss of canopy cover is necessary and there is no encroachment on root protection areas of trees adjacent to the site. The Assessment does set out a series of recommendations to ensure any construction effects will be minimised. Overall, it is considered the impact on the existing trees is acceptable and the proposals are in accordance with Camden Local Plan Policy A3.

Noise

- 12.48 London Plan Policy D13 sets out the Agent of Change principle, which places the responsibility for mitigating the impact of noise and other nuisances on new development. It requires development proposals to manage noise and other potential nuisances by ensuring good design mitigates and minimises existing nuisances, exploring mitigation measures at an early stage and separate new noise sensitive development where possible from noise generating uses.
- 12.49 Policy D14 of the London Plan notes that development proposals should manage noise by avoiding significant adverse noise impacts on health and quality of life.
- 12.50 Camden Local Plan Policy A4 sets out that noise and vibration in developments will be managed, and planning permission will only be granted for noise generating equipment (including plant and machinery) if it can be operated without causing harm to amenity. Detailed standards are set out in Appendix 3 of the Local Plan.

Assessment

- 12.51 An Environmental noise survey and noise egress limits report has been prepared by Sandy Brown and submitted as part of this applications. In terms of observations, the report sets out that the dominant noise sources observed at the site during the survey were from construction works occurring at Boswell House and traffic along Theobalds Road.
- 12.52 It is noted that though construction noise was a dominant noise source, it was intermittent, and we would not expect it to significantly impact the measured background noise levels.
- 12.53 The Report confirms the representative background sound levels from the noise survey were LA90,15min 54 dB during the day, and LA90,15min 51 dB during the night.
- 12.54 Based on the requirements of the Local Authority, the relevant plant noise limits at the worst affected existing noise sensitive premises are LAeq 45 dB during the day, and LAeq 42 dB

during the night. Replacement and new plant will therefore be designed to achieve the noise limits set out above and this could be readily secured by way of planning condition.

Air Quality

- 12.55 London Plan Policy SI 1 requires that development proposals are at least air quality neutral and states that they should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Part D requires developments to reduce the impact on air quality during demolition and construction phase. Part E of the policy encourages any required emissions reductions to reach Air Quality Neutral to be carried out on site, before off-site measures are considered.
- 12.56 Camden Local Plan Policy CC4 sets out that the Council will ensure the impact of development on air quality is mitigated, requiring Air Quality Assessments where developments are likely to have an impact on Air Quality and provide mitigation measures.

Assessment

- 12.57 An Air Quality Assessment has been prepared by Air Quality Plan to assess the air quality for potential future occupiers.
- 12.58 As the Proposed Development is not a major development, nor do they introduce the combustion of biomass materials or gas fired CHP plant, the Air Quality Assessment is only required to consider the potential air quality for future occupiers in an area of poor air quality.
- 12.59 The Site is located in a busy area of central London. Theobalds Road is a busy throughfare used by cars, buses, and lorries and is surrounded by densely populated roads. There is also parking associated within the Site. As such, there is potential for vehicle pollution. The Site is within close proximity of Holborn and Russell Square underground stations, where trains can also be a source of pollution.

- 12.60 The Site falls within the Camden Air Quality Management Area which has been in force for Nitrogen Dioxide and Particular Matter pollution since 2002.
- 12.61 The existing building ventilation is “basement up” which means that it draws in fresh air at ground level where it is most polluted and exhausts at roof level. Air typically needs to be drawn above 4th and 5th level to be below acceptable pollution levels. A modern energy efficient design solution would be “top down”, this requires roof-mounted plant and permits fresh, clean air to be drawn from above roof level.
- 12.62 It is proposed to provide centralised ventilation to all levels with Cat A office space. 4no. AHUs will serve the office area, 2no. units will be located on the 9th floor plant deck, 1no. unit will be on the 7th floor roof and 1no. unit will be in the basement.
- 12.63 The Proposed Development has considered the potential air quality for future occupiers, and the proposed scheme will improve upon the existing situation in line with Camden Local Plan Policy CC4.

Flood Risk and Drainage

- 12.64 The NPPF identifies that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 12.65 Paragraph 173 of the NPPF states where appropriate applications should be supported by a site-specific flood risk assessment. In addition, it states that development should only be allowed in areas at risk of flooding where it incorporates sustainable drainage systems unless there is clear evidence that this would be inappropriate.
- 12.66 London Plan Policy GG6 seeks to help London become a more efficient and resilient by ensuring that buildings are designed to reduce impacts from natural hazards like flooding.

- 12.67 London Plan Policy SI 12 states that development proposals should ensure that flood risk is minimised, mitigated and the residual risks are addressed.
- 12.68 London Plan Policy SI 13 states that developments should aim to achieve greenfield run-off rates by maximising the use of above ground Sustainable Urban Drainage Systems (SuDS). Proposals should follow the drainage hierarchy set out at part B of the policy.
- 12.69 Local Plan Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible. It requires development to incorporate water efficiency measures; avoid harm to the water environment and improve water quality; consider the impact of development in areas at risk of flooding (including drainage); incorporate flood resilient measures in areas prone to flooding; utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and not locate vulnerable development in flood-prone areas.
- 12.70 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.

Assessment

- 12.71 A Flood Risk Assessment (FRA) has been prepared by London Structures Lab in accordance with the NPPF and Local Plan requirements. As such, it demonstrates that flood risk from all sources (fluvial, tidal, surface water, groundwater, sewers, reservoirs and canals) have been considered in relation to the Proposed Development.
- 12.72 All sources of flooding (excluding groundwater) are considered to have a 'low/negligible' risk of flooding. Groundwater flooding is considered to be 'high risk' and requires active consideration and associated mitigation proposals.
- 12.73 The FRA states that due to the perceived high risk of groundwater flooding for the Site, it is necessary to consider flood resilient design measures to mitigate against this risk. It sets out

that there are sump chambers with pumps that can be utilised in a flood and critical pieces of plant are located on RC upstands to raise them above floor level. In terms of the existing basement, the FRA recommends waterproofing is inspected and repaired/replaced as required. It adds that the same strategy for keeping plant above slab level should be utilised and where possible critical equipment should be located at higher levels.

- 12.74 The surface water drainage design has been developed in line with LLFA requirements and applying appropriate mitigation factors. The FRA concludes that the development should not be precluded on flood risk grounds.
- 12.75 The Proposed Development has been designed to not increase the risk of flooding in line with Camden Local Plan Policy CC3.

13 Section 106 obligations and CIL

- 13.1 Under Section 106 of the Town and Country Planning Act 1990 (as amended) local planning authorities have the power to enter into planning obligations with the Applicant and any persons with an interest in the land to be developed as a means of mitigating any impacts of a development proposal.
- 13.2 In accordance with Regulation 122(2) of the CIL Regulations (as amended), and paragraph 57 of the NPPF, planning obligations should only be sought where they meet all the following tests:
- a) Necessary to make the development acceptable in planning terms;
 - b) Directly related to the development; and
 - c) Fairly and reasonably related in scale and kind to the development.
- 13.3 Paragraph 55 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 13.4 Camden Local Plan Policy DM1 sets out that Council will use planning obligations, where appropriate to:
- i. Support sustainable development,
 - ii. Secure the infrastructure, facilities and services to meet the needs generated by development and
 - iii. Mitigate the impact of development.

Community Infrastructure Levy

- 13.5 Since 2012, all developments in London which result in the addition of over 100sqm GIA floorspace (with some exceptions including affordable housing) have been eligible to pay Mayoral CIL. In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2

came into effect on 1 April 2019 and supersedes MCIL1 and the associated Crossrail Funding SPG. The relevant MCIL2 rates are as follows:

- Office – £185 per sqm (Central London).

13.6 Camden CIL came into effect on 30 October 2020. The CIL tariff for sites located within Central Camden (i.e. Zone A) are charged at the following rates:

- Office - £110 per sqm.

Developer Contributions CPG (March 2019)

13.7 The CPG sets out how the Council will use Section 106 Contributions and CIL to fund infrastructure in the Borough. It states that financial contributions will be sought in respect of affordable housing, open space, infrastructure to address the site specific and related impacts of development which may include financial, and non-financial contributions. Detailed guidance for calculating specific financial obligations is set out within the relevant CPGs.

Draft Heads of Terms

13.8 At this stage, it is anticipated that the following of Section 106 contributions and obligations involved with this development could include:

- Mixed Use - PIL Contribution;
- Section 278 Highway works;
- Delivery and Servicing Management Plan;
- Construction Management Plan; and
- Travel Plan Monitoring Contribution.

14 Summary and Conclusions

- 14.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. This Town Planning Statement has assessed the Proposed Development against the Development Plan and other relevant planning policy and guidance at national, regional and local policy level.
- 14.2 This application is submitted following pre-application engagement with both Camden Council Officers and the local community as described in the Statement of Community Involvement, prepared by Quatro and at Section 5 of this Statement.
- 14.3 During this process, there have been alterations to the Proposed Development demonstrating that the design team have responded positively to feedback received.
- 14.4 The Proposed Development has been designed to an exemplary standard by Orms Architects. The Proposed Development would secure the delivery of high-quality modern workspace in Camden.
- 14.5 The Proposed Development seeks to sensitively and sustainably refurbish and extend the existing building to provide high quality, sustainable workspace designed to meet changing office demands and to modernise the existing office accommodation. This will involve the creation of 598sqm of new, modern workspace with a focus on the provision of amenities wellbeing.
- 14.6 The Proposed Development will deliver several planning benefits, as follows:
- Contribution to the regeneration and transformation of the area;
 - Sustainable reuse and repositioning of a building which no longer meets modern office user requirements;
 - Delivering an uplift of 598 sqm (GIA) in high quality office floorspace;
 - Financial contribution to Camden's affordable housing fund via payment in lieu;

- Delivering sustainable development through improvements in energy efficiency,
- Introducing an additional 128 cycle spaces;
- High quality design, contributing to the wider townscape and local streetscape; and
- Contributing to the function and character of the area through the provision of a new active public use at ground floor level to reactivate street frontages.

14.7 For the reasons and those set out in detail in this Statement, it is considered that the Proposed Development is in accordance with the policies of the Development Plan, and as such the Application should be granted planning permission accordingly.