



EUSTON TOWER

Town Planning Statement
Addendum

December 2024





Town Planning Statement Addendum

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

On behalf of: British Land Property Management Limited

December 2024

U0006289

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1 Introduction

- 1.1 This Planning Statement Addendum summarises the revisions made to the pending application for Full Planning Permission (ref. 2023/5240/P), submitted in December 2023 (the “December 2023 Submission”) for the Proposed Development at Euston Tower (286 Euston Road, London).
- 1.2 The Applicant has undertaken extensive consultation during both the pre-application and determination stages of the Proposed Development and has sought to respond positively to the responses received. The scheme has been revised in response to feedback from Officers, local stakeholders, local residents, and statutory consultees, including Historic England and the Greater London Authority.
- 1.3 This Addendum has been prepared detailing the revisions to the pending scheme (the “Proposed Development”). For the avoidance of doubt, the Planning Statement which accompanied the December 2023 Submission is considered as read and this Addendum deals only with the December 2024 Revisions and any updates to assessments as a result of these revisions. This Addendum also clarifies and provides further details responding to consultation responses received since the original submission in December 2023. Save where varied or supplemented in this Addendum, the content of the December 2023 Planning Statement remains valid and up to date.
- 1.4 The Description of Development for the Proposed Development, in light of the December 2024 Revisions, has been updated to the following (amendments in bold):

*“Redevelopment of Euston Tower comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building providing offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and Enterprise Space (Class E/F) at ground **and first** ~~and second~~ floors, and associated external terraces; public realm enhancements, including new landscaping and provision of new publicly accessible steps and ramp; short and long stay cycle storage; servicing; refuse storage; plant and other ancillary and associated work.”*

1.5 The principal components of the December 2024 Revisions comprise:

- **Massing**

- Tower

- Tower massing is adjusted to create a simpler, rectangular form with rounded corners.
- Breathing spines are pushed inwards to separate the tower into four quadrants.
- There is no change to the tower height.

- Podium

- Podium massing is adjusted along with the tower massing to be rectilinear with rounded corners, creating an increase in ground floor open space along Hampstead Road.
- The entrance to the Enterprise Space (comprising a hybrid of affordable workspace and the Neighbourhood Innovation Lab) along Hampstead Road is adjusted from triple height to double height.
- The number of podium levels is increased from four to six (L00-L05) with an associated increase in height of 2 levels.

- **Tower**

- The façade design incorporates an upstand into horizontal elements that wrap the rounded massing corners. Vertical elements span the tower from top to bottom through which natural ventilation can occur.
- There is minor adjustment to the vertical transportation strategy via level change for switch from mid- to high-rise lift banks.
- Four double height amenity terraces have been relocated relative to their previous quadrants/levels. All four double height amenities provide external terraces in various depths/heights.
- The column grid is adjusted to 9m bays and offset from the façade by 2m. The mega bracing strategy is adjusted to a Z arrangement.
- The crown of the building has a double height amenity façade treatment such that the building is perceived the same from all angles. This is created by a combination of the façade treatment and the internal arrangement of central plant space at L30 and a “bathtub” of plant space at L31 that sets back from the tower façade.

- **Podium**
 - The escalator and stair layout of lobby space has been adjusted to be more efficient.
 - The layout of the Enterprise Space has been adjusted following feedback from Camden and during public consultation.
- **Land Uses**
 - The Enterprise Space is located at levels 00 and 01 except for the class E area at the top of the café staircase on L02.
- **Public Realm**
 - Main entrances to the lobby space remain as in the submitted planning application in December 2023 submission: on the southwest and southeast corners of the ground floor.
 - Main entrance to the Enterprise Space remains at the northeast corner.
 - The public entrance to the restaurant space at L01 Regent's Place Plaza remains on northwest corner.
 - Minor updates have been made to the design and location of planters and trees in the public realm.
- **Transport**
 - End of trip facilities entrance and access has been adjusted to a bicycle stair and lift. External access remains from the southwest corner of the ground floor.
- **Affordable Housing**
 - In discussion with Camden Council, the Applicant has been working towards identifying a donor site for the delivery of affordable homes. An opportunity has been identified to deliver much needed additional affordable homes on the Council-owned Tybalds Estate and the applicant has committed to providing £27m of funding which could be used to deliver these much-needed affordable homes.
- **Affordable Workspace**
 - Joining a collection of affordable spaces that benefit the local community at Regent's Place, 746 sqm of Enterprise Space is proposed at ground and first floor level. A minimum 465 sqm of this space would be affordable workspace supporting local enterprises with space for start-ups, at a 100% discount to

market rents for a minimum of ten years. The remainder of the space would be used flexibility for inclusive innovation, collaboration and knowledge sharing.

1.6 As discussed in detail below and within the accompanying submission material, the Proposed Development, as a result of the December 2024 Revisions, responds to the consultation feedback that has been received on the application, while maintaining and improving the strategic and local public benefits proposed as part of the original submission in December 2023.

1.7 The Proposed Development will re-imagine Euston Tower to create a world leading science, technology and innovation building and public realm for Camden and the Knowledge Quarter that inspires, connects and creates opportunities for local people and businesses. The reimaged Euston Tower will deliver the following public benefits:

Bringing the Building Back into Use

1.8 Euston Tower is no longer fit for purpose. The proposed design will retain 31% of the original structure, through partial deconstruction, support an ambitious circular economy strategy, and deliver a greener, all-electric building, fit for the future. We are targeting minimum 21% glass reuse and recycling as building glass (up to 81% subject to feasibility and ongoing discussions with the supply chain); 100% steel and aluminium reuse and recycling; testing and piloting concrete use, where possible, within the project.

Workspace for Pioneers

1.9 Workspace for innovative businesses, directly responding to and accelerating the success of the Knowledge Quarter.

Enterprise Space

1.10 Joining a collection of affordable spaces that benefit the local community at Regent's Place, 746 sqm of Enterprise Space is proposed at ground and first floor level. A minimum 465 sqm of this space would be affordable workspace supporting local enterprises with space for start-

ups, at a 100% discount to market rents for a minimum of ten years. The remainder of the space would be used flexibly for inclusive innovation, collaboration and knowledge sharing.

Employment Opportunities for Camden Residents

- 1.11 Working in partnership with Camden's Inclusive Economy Team, we have developed the Euston Tower Employment and Skills Delivery Plan – a roadmap for enabling employment and skill development opportunities for local people through the Euston Tower project.
- 1.12 Present (2023-25): work experience, internships and short-term employment opportunities linked to planning and design.
- 1.13 Future (2026-38): work experience, internships and employment opportunities linked to construction and end-use.
- 50 two-week work experience placements;
 - 160 apprenticeships across design/construction & STEAM; and
 - 70 jobs for local people, paid London Living Wage.

Over £16M Investment in the Public Realm

- 1.14 Over £16m investment into new and revitalised outdoor public spaces and routes to create a safe, accessible, connected, green and creative environment for all of the community to enjoy. A cohesive approach to architectural and landscape design will mitigate the severe wind conditions experienced at the base of Euston Tower today.

£37m Investment in Social and Physical Infrastructure

- 1.15 In discussion with the Council and in line with Camden planning policy, an opportunity to deliver much needed additional affordable homes on the Council-owned Tybalds Estate has been identified and the Applicant has committed to providing £27m of funding via a payment-in-lieu which could be used to deliver these.

1.16 Over £10m in CIL and S106 (including employment and skills) contributions.

Application Documents

1.17 The table below sets out the documents submitted in December 2023 and sets out whether this document have been revised in full or if an addendum has been prepared to accompany this revised planning application.

Original December 2023 Submission Document	Revision or Addendum	December 2024 Submission Document Title
Covering Letter, prepared by Gerald Eve LLP	New Covering Letter to be read in conjunction with December 2024 Revisions	New Covering Letter December 2024, prepared by Gerald Eve LLP
CIL Form, prepared by Gerald Eve LLP	Revision to supersede original	Revised CIL Form December 2024, prepared by Gerald Eve LLP
Architectural Drawing Pack, prepared by 3XN (refer to Drawing Register dated 1 December 2023)	Revision to supersede original	Revised Architectural Drawing Pack, prepared by 3XN (refer to Drawing Register dated 18 November 2024)
Town Planning Statement, prepared by Gerald Eve LLP	Addendum to be read in conjunction with Town Planning Statement, dated December 2023	Town Planning Statement Addendum December 2024, prepared by Gerald Eve LLP
Accessibility Statement, prepared by DBA	Addendum to be read in conjunction with Accessibility Statement, dated December 2023	Accessibility Statement Addendum December 2024, prepared by DBA
Acoustic Report, prepared by Hann tucker Associates;	Addendum to be read in conjunction with Acoustic Assessment, dated December 2023	Acoustic Report Addendum December 2024, prepared by Hann tucker Associates;
Archaeological Desk-Based Assessment, prepared by Museum of London Archaeology ("MOLA");	Addendum to be read in conjunction with Archaeological DBA dated December 2023	Archaeological Desk-Based Assessment Addendum December 2024, prepared by Museum of London Archaeology ("MOLA");
Basement Impact Assessment, prepared by Arup;	Revision to supersede original	Basement Impact Assessment Revision P07 December 2024, prepared by Arup;
Biodiversity Survey and Report, prepared by Greengage;	Revision to supersede original	Biodiversity Survey and Report December 2024, prepared by Greengage;
N/A	Revision to supersede original	Urban Greening Factor Assessment December 2024, prepared by Greengage;
Circular Economy Statement, prepared by GXN and Sweco;	Revision to supersede original	Circular Economy Statement Revision C December 2024, prepared by GXN and Sweco;
Crime Impact Assessment, prepared by QCIC;	Revision to supersede original	Crime Impact Assessment Revision H December 2024, prepared by QCIC;
Design and Access Statement, prepared by 3XN;	Revision to supersede original	Revised Design and Access Statement Revision B, prepared by 3XN;

Employment and Skills Strategy and Regeneration Statement, prepared by Volterra;	Addendum to be read in conjunction with Employment and Skills Strategy	Employment and Skills Strategy Addendum and Regeneration Statement Addendum December 2024, prepared by Volterra;
Energy Statement, prepared by Arup;	Revision to supersede original	Energy Statement Revision P05 December 2024, prepared by Arup;
Daylight and Sunlight Assessment, prepared by Point 2;	Addendum to be read in conjunction with Daylight and Sunlight Assessment	Daylight and Sunlight Assessment Addendum V3, prepared by Point 2;
Demolition Feasibility Appraisal Volume 1, 2 and 3, prepared by GXN and Arup;	Revision to Volume 3 to supersede original	Revised Demolition Feasibility Appraisal Volume 3 Revision B December 2024, prepared by GXN and Arup;
Drainage and SuDS Strategy, prepared by Arup;	Addendum to be read in conjunction with Drainage and SuDS Strategy	Drainage and SuDS Strategy Addendum Issue 04 December 2024, prepared by Arup;
Fire Statement, prepared by Arup;	Addendum to be read in conjunction with Fire Statement	Fire Statement Addendum December 2024, prepared by Arup;
Flood Risk Assessment, prepared by Arup;	Addendum to be read in conjunction with Flood Risk Assessment	Flood Risk Assessment Addendum Issue 02 December 2024, prepared by Arup;
Health Impact Assessment, prepared by Arup;	Addendum to be read in conjunction with Health Impact Assessment	Health Impact Assessment Addendum, prepared by Arup;
Landscaping Scheme, prepared by DSDHA;	Addendum to be read in conjunction with Landscaping Scheme	Landscaping Scheme Addendum Revision R1 December 2024, prepared by DSDHA;
Lighting Assessment, prepared by Arup within the December 2023 Design and Access Statement;	Addendum to be read in conjunction with Lighting Assessment in DAS	Lighting Assessment Addendum December 2024, prepared by Arup;
Landscaping Plans, prepared by DSDHA (refer to Drawing Register dated 1 December 2023);	Revision to supersede original	Landscaping Plans, prepared by DSDHA (refer to Drawing Register dated 10 December 2024);
Public Use Framework, prepared by Forth;	Revision to supersede original	Enterprise Space Framework December 2024, prepared by Forth;
Structural Report, prepared by Arup;	Revision to supersede original	Structural Report Revision 01 December 2024, prepared by Arup;
Sustainability Statement (including BREEAM, WELL Pre-Assessment and Whole Life Carbon Assessment), prepared by GXN and Sweco;	Revision to supersede original	Sustainability Statement Revision C December 2024 (including BREEAM, WELL Pre-Assessment and Whole Life Carbon Assessment), prepared by GXN and Sweco;
Statement of Community Involvement, prepared by LCA;	Addendum to be read in conjunction with Statement of Community Involvement	Statement of Community Involvement Addendum December 2024, prepared by LCA;
Telecommunications Report, prepared by GTech;	Addendum to be read in conjunction with Telecommunications Report	Telecommunications Report Addendum Issue 1.0 December 2024, prepared by GTech;

<p>Transport Assessment, prepared by Velocity Including:</p> <ul style="list-style-type: none"> • Draft Construction Management Plan, prepared by Lendlease; • Delivery Servicing Management Plan, prepared by Velocity; • Car Parking Design and Management Plan, prepared by Velocity; • Operational Waste Management Strategy, prepared by Velocity; • Site Waste Management Plan, prepared by Velocity; • Outline Travel Plan, prepared by Velocity; • Outline Construction Logistics Plan, prepared by Velocity 	<p>Addendums to be read in conjunction with Transport Assessment, Delivery Servicing Management Plan, Car Parking Design and Management Plan, Operational Waste Management Plan, Site Waste Management Plan, and Framework Travel Plan.</p> <p>Revised Draft Construction Management Plan to supersede original</p>	<p>Transport Assessment Addendum Version 1.0 December 2024, prepared by Velocity Including:</p> <ul style="list-style-type: none"> • Revised Draft Construction Management Plan December 2024, prepared by Lendlease; • Delivery Servicing Management Plan Addendum Version 1.0 December 2024, prepared by Velocity; • Car Parking Design and Management Plan Addendum Version 1.0 December 2024, prepared by Velocity; • Operational Waste Management Strategy Addendum Version 1.0 December 2024, prepared by Velocity; • Site Waste Management Plan Addendum Version 1.0 December 2024, prepared by Velocity; • Outline Travel Plan Addendum Version 1.0 December 2024, prepared by Velocity; • Outline Construction Logistics Plan Version 1.0 December 2024, prepared by Velocity
<p>Arboricultural Assessment, prepared by SJ Stephens;</p>	<p>Revision to supersede original</p>	<p>Arboricultural Assessment December 2024, prepared by SJ Stephens;</p>
<p>Ventilation Strategy, prepared by Arup;</p>	<p>Addendum to be read in conjunction with Ventilation Strategy</p>	<p>Ventilation Strategy Addendum Revision P04 December 2024, prepared by Arup;</p>
<p>Whole Life Carbon Assessment, prepared by GXN;</p>	<p>Revision to supersede original</p>	<p>Whole Life Carbon Assessment Revision C December 2024, prepared by GXN;</p>
<p>Environmental Statement, prepared by Trium; including:</p> <ul style="list-style-type: none"> • Volume 1, Chapter 1 (Introduction), prepared by Trium; • Volume 1, Chapter 2 (EIA Methodology), prepared by Trium; • Volume 1, Chapter 3 (Alternative and Design Evolution), prepared by Trium; • Volume 1, Chapter 4 (The Proposed Development), prepared by Trium; 	<p>Addendum ES to be read in conjunction with Environmental Statement.</p> <p>Revised Volume 1 Chapters 10 and 11, Volume 2 and Non-Technical Summary to supersede original</p>	<p>Environmental Statement Addendum December 2024, prepared by Trium; including:</p> <ul style="list-style-type: none"> • Volume 1, Chapter 1 Addendum (Introduction), prepared by Trium; • Volume 1, Chapter 6 Addendum (Socio Economics), prepared by Trium; • Volume 1 Chapter 7 Addendum (Traffic and Transport), prepared by Velocity; • Volume 1 Chapter 8 Addendum (Air Quality), prepared by AQC;

<ul style="list-style-type: none"> • Volume 1, Chapter 5 (Demolition and Construction), prepared by Trium; • Volume 1, Chapter 6 (Socio Economics), prepared by Trium; • Volume 1 Chapter 7 (Traffic and Transport), prepared by Velocity; • Volume 1 Chapter 8 (Air Quality), prepared by AQC; • Volume 1 Chapter 9 (Noise and Vibration), prepared by Hann Tucker; • Volume 1 Chapter 10 (Daylight, Sunlight, Overshadowing and Solar Glare), prepared by Point 2; • Volume 1 Chapter 11 (Wind and Microclimate), prepared by Arup; • Volume 1, Chapter 12 (Climate Change), prepared by AQC and Trium; • Volume 1, Chapter 13 (Effect Interactions), prepared by Trium; • Volume 1, Chapter 14 (Likely Significant Effects and Conclusions), prepared by Trium; • Volume 1, Chapter 15 (Environmental Management, Mitigation and Monitoring Schedule), prepared by Trium; • Volume 2 (Townscape, Visual & Built Heritage Impact Assessment), prepared by Tavernor and Cityscape Digital; • Volume 3 (Technical Appendices); and • Non-Technical Summary, prepared by Trium 		<ul style="list-style-type: none"> • Volume 1 Chapter 9 Addendum (Noise and Vibration), prepared by Hann tucker; • Revised Volume 1 Chapter 10 (Daylight, Sunlight, Overshadowing and Solar Glare), prepared by Point 2; • Revised Volume 1 Chapter 11 (Wind and Microclimate), prepared by Arup; • Volume 1, Chapter 12 Addendum (Climate Change), prepared by AQC and Trium; • Volume 1, Chapter 13 (Effects Interactions), Chapter 14 (Likely Significant Effects) and Chapter 15 (Environmental Management, Mitigation and Monitoring) Addendum, prepared by Trium; • Volume 2 (Townscape, Visual & Built Heritage Impact Assessment) Addendum, prepared by Tavernor and Cityscape Digital; • Volume 3 (Technical Appendices); and • Non-Technical Summary, prepared by Trium
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2 Site and Surrounding Area

The Site and Surrounding Area details are set out in the Planning Statement dated December 2023. Please refer to Section 3 of the Planning Statement.

- 2.1 The application red line has been updated and the proposed site covers an area of 7,963 sqm. There have been no further changes to the site and surrounding area since the December 2023 Submission.

3 Planning History

- 3.1 The relevant planning history of the Site is out in the Planning Statement dated December 2023. Please refer to Section 4 of the Planning Statement. There have been no changes to the planning history since the December 2023 Submission.

4 Development Proposals

4.1 This Chapter of the Planning Statement Addendum sets out the key aspects of the development proposals following revisions to the December 2023 Submission. A full description of the Proposed Development is provided in the Design and Access Statement, prepared by 3XN Architects.

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

“Redevelopment of Euston Tower comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building providing offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and Enterprise Space (Class E/F) at ground and first floors, and associated external terraces; public realm enhancements, including new landscaping and provision of new publicly accessible steps and ramp; short and long stay cycle storage; servicing; refuse storage; plant and other ancillary and associated work.”

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

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

- Reimagining the public spaces of Regent's Place Campus, creating safe, inclusive, connected and sustainable spaces for Camden's communities.
- Contributing £27m towards meeting Camden's housing needs.

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

Phasing

4.5 The proposal has been designed to be delivered in three phases, and will be a phased planning permission:

- Phase 0 – Preparatory and enabling works;
- Phase 1 – Deconstruction; and
- Phase 2 – Construction.

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

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

Deconstruction

4.8 The Proposed Development seeks to retain the central core, basement and foundations of the existing Euston Tower, deconstructing the slabs and façade. It is envisaged that 31% of the existing structure would be retained. Opportunities for reuse, recycling and upcycling of the

deconstructed material are being explored and are discussed further in Chapter 9 (Principle of Deconstruction) of the Planning Statement dated December 2023.

Land Use Summary

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

Land Use	Existing (GIA sqm)	December 2023 Proposed (GIA sqm)	December 2024 Proposed (GIA sqm)	December 2024 Net Change from existing (GIA sqm)
Workspace (Class E(g))	53,771	74,792	77,223	+25,077
Retail (Class E)	1,055	748	997	-1,683
Enterprise Space (Class E/F)	0	2,003	1,605	+1,605
Total	54,826	77,542	79,825	+24,999

Table 1: Existing and Proposed Land Uses GIA (G&T Area Schedule, dated 16 October 2024)

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

4.10 The proposals lead to a total floorspace uplift of 24,999 sqm (GIA). An increase of 2,283 sqm (GIA) from the December 2023 proposals.

Level	Use	Area (GIA sqm)
Basement	Back of house and servicing facilities	5,684
Levels G-1	Office lobby, cafe and Enterprise Space	4,040
Level 2	Office lobby, office space, and café	2,410
Level 3-11	Lab enabled space	22,630
Levels 12-30	Office space	44,620
Level 31	Plant and lift services	441

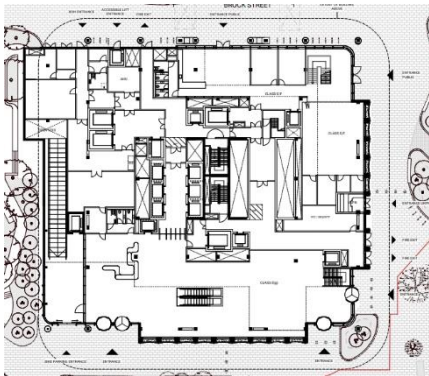
Table 2: Proposed Areas Split by Floor GIA (G&T Area Schedule, dated 16 October 2024)

4.11 The building has been designed in two distinct elements, the podium at the base of the building which interfaces with the new public realm surrounding the site, and the tower. The ground

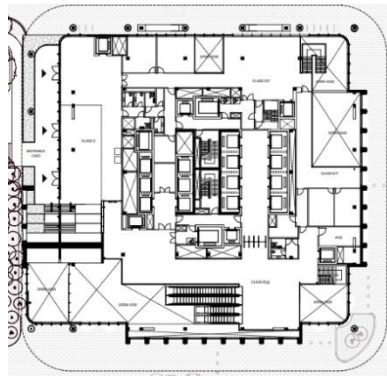
and first floor provide entrances to the public spaces and Enterprise Space in the podium and workspaces located in the tower.

Podium

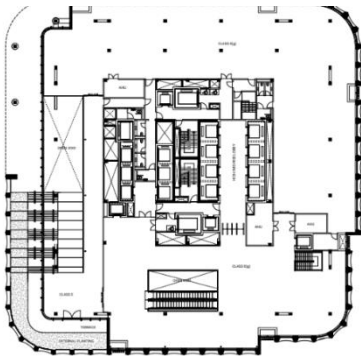
4.12 The podium comprises the ground, first, second, third, fourth and fifth floors of the proposed building. The podium has a larger footprint in comparison to the tower above and at ground floor level, provides shelter from the wind and weather. The proposed ground floor to fifth floor plans are included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



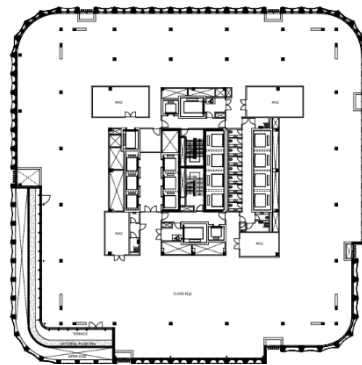
Proposed Ground Floor Plan



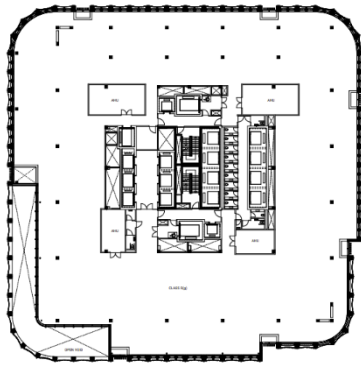
Proposed First Floor Plan



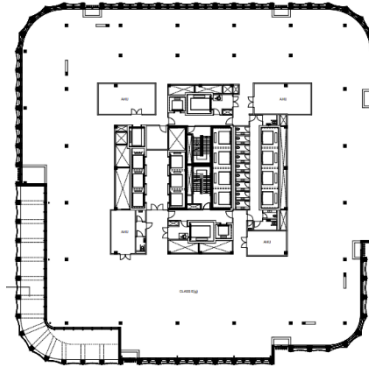
Proposed Second Floor Plan



Proposed Third Floor Plan



Proposed Fourth Floor Plan



Proposed Fifth Floor Plan

- 4.13 The ground and first floors are split; the southern section on the podium comprises the main entrance to the workspaces above, with entrances on the southern elevation (on Euston Road) together with a prominent cycle entrance to the southwest. This element of the podium functions as the gateway to the lift lobbies serving the upper podium and tower levels, which comprise the office and lab-enabled workspaces. These publicly accessible lobbies also accommodate areas for reception, wayfinding and retail spaces. The ground level lobby includes space for a café / F&B offer to serve and activate the space. The lobby design seeks to provide a versatile environment for both formal and informal gatherings, providing opportunities for individuals or groups to meet and collaborate.
- 4.14 The northern section of the podium comprises affordable workspace at ground and first floor with the primary entrance to the Enterprise Space located on the northeastern corner on Hampstead Road. The ground floor leads to flexible spaces for publicly accessible activities and events including a double height, flexible exhibition space and affordable workspace with a variety of different sized rooms for working. At first floor there is a café, which opens out onto the external stairs and ramp, with views out on Regent's Place Plaza, the public realm that is to be updated as part of the Proposed Development and is a space for the community to enjoy.
- 4.15 The second floor provides connections to the level 2 lobby and outdoor terrace. There is proposed overlooking the double-height space of the café below, helping to ensure greater social connection across the floor levels. The remainder of the second floor provides office space.
- 4.16 The third, fourth and fifth floors would provide 8,348 sqm (GIA) of lab-enabled floorspace.

Tower

- 4.17 Lab enabled floorspace would be provided across Levels 06-11 of the tower for science and technology businesses which would seek to anchor the western end of the Knowledge Quarter.
- 4.18 The floors provide greater floor to floor heights which allow space for the diversity and extent of services required for lab enabled workspace.
- 4.19 The lab-enabled spaces would be flexibly designed to accommodate both dry and wet lab activities. Dry lab activities include software and hardware engineering, prototyping workshops and low-grade optical physics. The spaces would also be designed to accommodate contaminant levels 'CL1-2', covering the use of non-hazardous and low-to-medium risk hazardous agents.
- 4.20 Office space would start from Level 12 and extend up to Level 30, offering a flexible and versatile environment around a central core.
- 4.21 The floor plates can be subdivided to accommodate one, two, or three tenants, providing a tailored and adaptable setting that aligns with the diverse requirements of modern and future businesses.

Basement

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

Vertical Transportation

- 4.24 The tower's vertical transportation (VT) strategy has been developed with due consideration to parameters such as the number of levels served, total occupancy ratio and use distribution. This has resulted in two VT strategies working in tandem, with single-deck lifts serving the lab-enabled levels and double-deck lifts serving the mid-rise and high-rise office levels.
- 4.25 For office levels served by double-deck lifts, access is provided through lobbies at Levels 01 and 02. The double deck lifts are divided into stops either on odd or even levels. Upon entry, building users are guided to the relevant lobby depending on the destination level.

Access

- 4.26 There are five entrances (four at ground floor, one at first floor). Two lobby entrances are located to the south on Euston Road. The primary entrance to the Enterprise Space is from Hampstead Road to the east with a secondary entrance from Brock Street to the north, both at ground floor level. There is also an accessible entrance to the café and public spaces at first floor level via the external staircase and ramp, accessed from Regent's Place Plaza to the west.
- 4.27 The entrance from Regent's Place Plaza is situated on the west side at Level 01, accessible via the terraced landscape and accessible sloped path.

Amenity Spaces

- 4.28 Double height amenity spaces are provided at levels 11-12, 20-21, 23-24 and 26-27. They provide architectural relief in the façade and a space for occupiers to enjoy.
- 4.29 These spaces are to be used as internal tenant amenity, with exterior planters on four of the terraces. These spaces provide users with a shared gathering space where they have access to an outdoor environment and are in close proximity to plants. Along the perimeter of the terraces, there is a planter that extends urban greening up the tower. The two lower amenity spaces have greater depth on both elevations, while the two upper amenity spaces optimize the depth of the terrace along the north elevation. A terrace is also provided at level 2 and two planter balconies at level 3 and 6.

Design Concept

- 4.30 The height of the Proposed Development is informed by the existing tower and is limited by LVMF views as discussed in this Addendum Statement. The conceptual massing approach for the Proposed Development focuses on splitting up the vertical massing, comprising of four quadrants creating a coherent form when viewed from all directions.
- 4.31 The four quadrants are connected in plan, surrounding a central core which allows for multiple of single tenant use throughout the Proposed Development.
- 4.32 The servicing strategy is integral to the overall 'four quadrant' building concept. The four air handling units required per floor throughout each element of the Proposed Development serve to divide the four quadrants in both plan and elevation, expressing the ventilation requirements of a modern office and lab enabled commercial building on the exterior.
- 4.33 The podium aims to bring the tower down to the local level. The concept is to significantly open up the lower levels, creating a permeable, accessible and engaging podium over multiple floors that offers a variety of safe, inclusive, connected and sustainable spaces for Camden's communities.

Materiality

- 4.34 The conceptual approach to materiality and colour proposes utilising three characteristics: solidity and robustness, colour and materiality and durability and longevity.
- 4.35 The colour and tone of the Proposed Development has evolved following an extensive contextual study. Inspiration has been drawn from Centre Point, located at the southern end of Tottenham Court Road. The two towers would frame each end of Tottenham Court Road, using a similar colour palette.
- 4.36 The podium proposes a warmer palette to complement the red brick of the surrounding context. The terracotta colour differentiates the podium and upper floors, creating a more 'human' scale experience for the publicly accessible podium.

Public Realm

- 4.37 Landscape architects, DSDHA, have designed a comprehensive public realm scheme which is safe, welcoming, creative and sustainable, with areas to sit and relax. The public realm has been designed to be educational and playful and would significantly improve the quality and biodiversity of the public realm.
- 4.38 The scope of the application boundary extends into Regent's Place Plaza to the west, Brock Street to the north, Euston Road to the south and Hampstead Road to the east. The public realm includes the ground floor external areas, the proposed steps and ramps on the western side of the building fronting the plaza.
- 4.39 Landscaped mounds are proposed throughout the Plaza, in response to the lack of available planting depth on the site given the basement located directly underneath.
- 4.40 External greening is incorporated into the scheme to provide opportunities for biodiversity throughout the site. Planted terraces are proposed at levels 3, 6, 11, 20, 23 and 26 and feature intensive planters. The proposed publicly accessible terrace at level 2 will provide a continuation of the landscape along the podium stairs and level 1, connecting to the Regent's Place Plaza public realm.
- 4.41 Hostile vehicle mitigation ('HVM') security bollards and wind mitigation features would be integrated throughout the public realm.

Biodiversity Net Gain ("BNG")

- 4.42 The Biodiversity Net Gain for the site is targeted to be over 35%. A significant improvement compared to the December 2023 submission which included a BNG target for over 26%.

Urban Greening Factor ("UGF")

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

Cycle Parking

4.44 A total of 890 long and 100 short stay cycle spaces are provided as part of the Proposed Development. 890 long stay cycle spaces would be in the basement of Euston Tower, which would be accessed via a ramp to the south. These comprise the following:

- 668 two-tier parking (75%);
- 89 foldable bicycle parking (10%);
- 89 Sheffield stands (10%); and
- 45 enlarged Sheffield stands (5%).

4.45 Both male and female changing facilities would be located adjacent to the long-stay cycle parking and would provide 593 lockers which equates to 2 lockers per 3 parking spaces. There would be 74 showers provided on-site which equates to 1 shower per 12 parking spaces, as well as 6 toilets, 2 of which would be accessible.

4.46 A total of 100 short stay cycle spaces would also be provided in the form of Sheffield Stands and these would be located throughout the public realm within the application boundary.

4.47 Two enlarged spaces to accommodate all types of cycle, including cargo bikes are proposed to be located to the south of the cyclist arrival area.

Office and Retail Deliveries

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

Life Science Deliveries

4.49 Life sciences require specialist bottled/liquid gas deliveries along with regular deliveries.

4.50 The liquid and bottled gas deliveries cannot take place within the basement and need to be at ground level. All specialist delivery activity is proposed to be to the northwest corner of the

building, with the public realm proposals having been designed to facilitate this whilst maintaining pedestrian flows. Further details are provided in the Transport Assessment.

Cargo Bike Deliveries

- 4.51 A cargo bike facility at both ground and basement levels will be provided to encourage the use of sustainable freight.
- 4.52 Deliveries made by larger cargo bikes or quadracycles would enter the Proposed Development via the existing basement ramp. Within the basement, two cargo bike parking bays would be provided.

Circular Economy

- 4.53 The Proposed Development incorporates a range of Circular Economy principles relating to the retention of the existing building and the reuse, recycling and upcycling of materials from deconstruction. These principles include:
- Retaining 31% of the existing structure in situ;
 - Minimising waste in deconstruction and construction;
 - Minimising waste in operation and end of life;
 - Seeking to reuse, upcycle and recycle materials at their highest value.

Energy and Sustainability

- 4.54 The Proposed Development achieves an overall reduction in regulated carbon dioxide emissions of 16% over Part L 2021.
- 4.55 The Proposed Development includes a range of sustainability strategies and approaches which are summarised below:
- Proposal targets BREEAM 'Outstanding' for the office with research and development areas and lab enabled floorspace, with BREEAM 'Excellent' for the retail areas.
 - Use of green roofs, in addition to biodiverse features in the landscaping.

- Mitigation to reduce the urban heat island effect including green roofs, public realm planting and planting across terraces.
- The proposal has been designed to be air quality neutral.
- The development is entirely car free, save for two Blue Badge spaces.

Housing

4.56 In discussion with Camden Council, the Applicant has been working towards identifying a donor site for the delivery of affordable homes. An opportunity has been identified to deliver much needed additional affordable homes on the Council-owned Tybalds Estate and the applicant has committed to providing £27m of funding which could be used to deliver these much-needed affordable homes.

5 Post Submission Consultation

- 5.1 The proposed development at Euston Tower has been subject to extensive consultation with Camden Council Officers, statutory consultees and local stakeholders at both pre-application and post-submission stages. For further details of the engagement strategy and consultation prior to the submission of the December 2023 proposals, please refer to the Statement of Community Involvement (“SCI”) and subsequent Addendum, prepared by LCA.
- 5.2 The SCI Addendum prepared by LCA outlines the engagement strategy in respect of the Proposed Development since the December 2023 submission, the activities that have taken place and analysis of the feedback received over the course of this process up to submission of the revised proposals.
- 5.3 The feedback received has been fully considered as part of the development evolution and the Applicant is committed to continuing to work and consult with the local community throughout the development process. The submitted SCI and SCI Addendum provides further details and outlines how key issues have been addressed. A table summary is included below:

Engagement Feedback	Design change in revised planning application
<p>Concern around the visual impact of the submitted Euston Tower design</p>	<p>The revised design introduces a calmer and simpler façade design which contributes to the appearance of a slimmer building. This has helped mitigate the impacts of the design on long-range views from key locations including Fitzroy Square and Regent’s Park.</p>
<p>Concern around how the submitted design for Euston Tower fit in with the wider Camden landscape</p>	<p>The revised design incorporates amendments to the submitted façade and colour of the tower, from a terracotta colour in the submitted scheme to a stucco colour. This colour change speaks to other notable buildings in Camden, including Centrepoint and Fitzroy Square. The podium design remains terracotta.</p>

Concerns around the level of wind at ground / podium level	The revised design introduces new rounded corners to the podium which helps to visually slim the building and further reduce the effects of wind at ground level.
Support from the community for the terracotta colour	The revised design of the podium includes a terracotta façade in the podium which better reflects the features and colours of buildings along Tottenham Court Road. Support for the warmer terracotta colour was a key piece of feedback received during the co-design process.
The building in its current form is unwelcoming to the public	The entrance to Hampstead Road has been changed from triple height to double height to ensure the entrance is less imposing and more human in scale.
It is important for Euston Tower to include spaces that will be used by the community	The revised design increases outdoor public space on Hampstead Road and brings the publicly accessible indoor space together over two levels to improve accessibility and usability. We have developed proposals for the 'Enterprise Space' which will include affordable workspace and flexible events and collaboration space helping to bring to life aspects of the original Neighbourhood Lab concept.

Engagement with LB Camden

- 5.4 Since the submission of the planning application in December 2023, the Applicant has continued to work with the Council including planning, design, highways and sustainability officers. Ongoing design work has addressed feedback from officers to create a design that helps to better meet the vision to create a world leading science, technology and innovation building and public realm for Camden. The design changes also ensure that the Proposed

Development is more in keeping with the local townscape while increasing public benefits for Camden.

- 5.5 Further details of the design evolution process since the December 2023 submission are contained within the Design and Access Statement.

Design Review Panel

- 5.6 An additional Design Review Panel (“DRP”) meeting was held on 9 August 2024 to present the proposed design changes. Comments raised related to townscape, sustainability, architecture and landscaping. The panel welcomed the revised proposals and considered them to be a significant improvement on the submitted scheme, including that the massing, façade, design and materials create a silhouette and appearance that fits better within the townscape.
- 5.7 The panel recommended further exploration of the podium and suggested the podium could be taller in relation to the proportions of the tower to help it relate better to the neighbouring buildings. This feedback has been incorporated into the revised proposals with the increase in podium levels.

Statutory Stakeholder Engagement

- 5.8 Further consultation with the following statutory bodies was undertaken following the submission of the planning application.

Greater London Authority (“GLA”)

- 5.9 The GLA Stage 1 response relating to the December 2023 submission was issued to the Applicant on 21 March 2024. The GLA supported the proposal in principle however required additional technical information in relation to energy, circular economy, drainage, air quality, green infrastructure and transport. The Applicant project team has sought to address the GLA’s comments where possible in the December 2024 Revisions and will continue to engage with the GLA during the determination process.

- 5.10 A meeting was held with the GLA in August 2024 where the revised proposals were discussed with officers. The GLA provided initial feedback confirming the improved building form and silhouette is welcomed and reduces the perceived bulk of the building. Officers provided several suggestions for the architectural team to explore. These have been incorporated through design evolution and discussions with Camden.

Transport for London (“TfL”)

- 5.11 Ongoing consultation has been carried out with TfL including a development update and construction logistics meeting on 29th August 2024. TfL were satisfied with the changes and support the public realm proposals.

Historic England

- 5.12 In July 2024, the applicant team met with Historic England to present the proposed changes to the design of the tower. Feedback at this meeting was positive, with Historic England stating the following in a subsequent email, *“The direction of travel is encouraging. The calmer and more ordered façade design, alongside the more muted colour, help to make the proposed development less assertive in the settings of Fitzroy Square and Regent’s Park than the previous design. It is possible that the harmful impacts we had previously identified would be largely removed, which is particularly welcome. We are grateful for the continued engagement and pleased that you have responded positively to our advice, working closely with the local authority.”*

Internal Consultees

- 5.13 Since the submission of the December 2023 proposals, responses have been received from LBC including the sustainability, trees, drainage, environmental health, air quality, heritage and highway officers. Following submission of the planning application in December 2023, in March 2024 the Applicant submitted supplementary and updated documents including an updated Design and Access Statement, Townscape and Visual Build Heritage Impact Assessment, Roof Plan Drawing, Assessment on the Risk of Flood and Drainage Strategy and

a proposed Lighting Strategy for the public realm to help the local community better understand the proposals with updated and new visuals.

- 5.14 The Applicant team have sought to proactively engage with LBC officers and respond to their comments. The December 2024 Revisions also seek to address LBC comments within the submission and the Applicant will continue to engage with officers throughout the determination process

Public Exhibition

- 5.15 Additional public exhibition events were held on 7 and 9 November 2024. 9 people attended the event on 7 November 2024 and 7 people attended the event on 9 November 2024. Attendees included representatives from Regent’s Park CAAC, Friends of Regent’s Park, and Triton Building. 3 comment cards were completed across both events. A summary of these responses are set out above in Paragraph 5.3 and within the Addendum SCI.

Stakeholder Engagement

- 5.16 Letters were issued to key stakeholders inviting them to a briefing on the December 2024 Revisions. The key stakeholders included Ward Councillors, Friends of Regent’s Park, Regent’s Park CAAC and Triton Building residents. Three meetings took place and are summarised below.

Stakeholder Group	Date of Meeting	Key themes
Regent’s Park Ward Councillors (Cllrs Ali and Shah)	15 August 2024	Discussion centred around the design changes. There was a particular focus on the public realm, including a shared aspiration that these spaces are welcoming and use sustainable materials. Following this meeting the design team reflected on the design of the interior spaces and the public realm to help develop the design of these spaces further.

Regent's Park CAAC	27 August 2024	Discussion centred around the visually slimmed down building and the façade colour, and how the new colour better reflects the white stucco of Regent's Terrace and Fitzroy Square.
Triton Building Residents	3 and 5 September 2024	Residents were supportive of the proposed changes, noting the revised design was 'more elegant' and reduced its visual impact. The project team answered several questions around the timings of the revised planning application and construction.

6 Policy Framework and Legislation

- 6.1 Following the submission of the proposals within the December 2023 Submission, the following updates to the planning policy framework are relevant considerations for this consideration of this application.

National Planning Policy Framework

- 6.2 The recent consultation on changes to the National Planning Policy Framework (NPPF), which ran from July to September 2024, proposed reforms aimed at boosting housing delivery and achieving sustainable economic growth.
- 6.3 The consultation concluded in September and the adopted NPPF is expected in December. At the time of writing, as the final document has not been released, this is not considered a material consideration to this planning application.

Biodiversity Net Gain

- 6.4 On 12 February 2024, Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). This included the requirement for developers to deliver a BNG of 10%. Requiring developments to result in more or better-quality natural habitat than there was before development.
- 6.5 The planning application is not subject to this legal requirement by virtue of having been submitted before it came into force. However, the December 2023 Submission exceeded this 10% requirement and the revised application continues to do so. As such, it is anticipated the need to deliver biodiversity gains will be secured in connection with any grant of planning permission for the proposed development.

Emerging Planning Policy

Draft new Local Plan

- 6.6 Camden Council is in the process of updating its Local Plan. The emerging Camden Local Plan is currently in its consultation stage. The Regulation 18 consultation took place in early 2024. Further consultation is anticipated in 2025, with adoption currently anticipated in Spring 2026.
- 6.7 Therefore, at this stage, in line with paragraph 48 of the NPPF, limited weight should be applied to policies within the draft emerging Local Plan. In light of this, these emerging policies have not been referenced and the proposals have not been assessed against the policies in this Planning Statement Addendum.

Euston Area Plan

- 6.8 The Euston Area Plan (EAP) has seen notable progress in 2024, with updates reflecting the UK government's decision to scale back HS2 construction and plans for the station. The number of platforms at Euston for HS2 has been reduced and delivery timescales are uncertain. Despite this, the EAP remains focused on key objectives: delivering new homes, jobs, open spaces, and community facilities, while improving connectivity in and around Euston Station.
- 6.9 Consultations held in 2023 and 2024 emphasised adjustments to the EAP, setting new, lower targets for housing and job creation to match the reduced scope of HS2. The council continues to push for a comprehensive redevelopment plan that integrates HS2, Network Rail, and Underground services.
- 6.10 The Labour Government announced its commitment to delivering HS2 at Euston at the budget on 30th October 2024, however further announcements on timeframes are awaited and may inform a later revision of the EAP, which is anticipated in early 2025.

6.11 At this stage, as the updated Euston Area Plan is not an adopted document, the December 2024 submission has not been assessed against the draft document in this planning statement addendum.

7 Principle of Development

- 7.1 The principle of development is established in the Planning Statement, dated December 2023. Please refer to Section 8 of the Planning Statement. There have been no changes since the December 2023 Submission.

8 Principle of Deconstruction

- 8.1 The principle of deconstruction is established in the Planning Statement, dated December 2023. Please refer to Section 9 of the Planning Statement. There have been no changes since the December 2023 Submission.

9 Land Use

- 9.1 This section sets out the assessment of the Proposed Development in terms of the proposed land uses. Please refer to Section 10 of the Planning Statement dated December 2023 for the relevant planning policy applicable to this application.

Assessment

- 9.2 The revised Proposed Development continues the intentions of the December 2023 Submission to deliver a world leading science, technology and innovation building and public realm for Camden and the Knowledge Quarter that inspires, connects and creates opportunities for local people and businesses. The Proposed Development comprises commercial uses, including commercial office and lab-enabled spaces and 'Enterprise Space' which comprises affordable workspace and flexible community spaces.

Commercial Office and Lab-Enabled Spaces

- 9.3 The proposed use of the Site for commercial uses, including the provision of lab-enabled floorspace, is supported at all levels of planning policy. The proposal seeks to intensify the quantum of floorspace on site. The Proposed Development seeks to provide 77,223 sqm of employment floorspace, an uplift of 25,077 sqm.
- 9.4 British Land is looking to reposition Regent's Place as a hub for science, innovation and technology in the Knowledge Quarter. The delivery of modern office and lab enabled floorspace at Euston Tower forms a critical part of this vision.
- 9.5 Delivering the proposals would support and contribute to the growth and success of the KQ as a world-class cluster of science and knowledge-based institutions.
- 9.6 The Employment and Skills Strategy and Regeneration Statement dated December 2023 and December 2024 Addendum, prepared by Volterra, states that demand for laboratory space in London, and Camden specifically, is high due to its the concentration of academic and research institutions and teaching hospitals in this area. Vacancy rates are currently sitting at less than 1%, which demonstrates the strong demand within the sector. The 22,630 sqm of

lab-enabled space proposed is equivalent to approximately 10% of the active requirement for lab demand in the Golden Triangle, (London, Oxford and Cambridge).

- 9.7 The lab-enabled space on Levels 3-11 has been designed to accommodate a range of business sizes.
- 9.8 The lab-enabled floorspace has been designed to meet the specific needs and demands of life science occupiers. The proposals provide floor-to-floor heights required to support laboratories (at 4.08m in comparison to the office floor to floor heights of 3.8m) including space for additional servicing and structural stability to minimise vibration and support additional loading. The floorplates can be sub-divided and have been designed to allow for future reconfiguration if required.
- 9.9 Levels 03-11 could be adapted to accommodate office uses if required, albeit with more generous floor-to-ceiling heights.
- 9.10 The Proposed Development would provide Enterprise Space at the lower levels, which would encourage interaction and innovation, inspiring, connecting and creating opportunities for the local community in science, technology and innovation.
- 9.11 The site is located within the CAZ, and the proposals would enhance the office function of this strategic location.
- 9.12 The Employment and Skills Strategy and Regeneration Statement (prepared by Volterra) sets out that the latest available monitoring data shows that in Camden between 2014/15 and 2019/20, 229,939 sqm of B1a (office) space was approved, equivalent to 38,323 sqm per year. This demonstrates that there is shortfall in the delivery and pipeline against LBC's targets of 41,000 sq m per year for office floorspace, which is likely to be larger in practice as not all planning approvals are built out. The scheme would contribute significantly to meeting the office floorspace targets set out by LBC, contributing more than the annual requirement for office space and 11% of space over the entire plan period (2014-2031). Further details of this are set out within the submitted Employment and Skills Strategy and Regeneration Statement dated December 2023 and the December 2024 Addendum, prepared by Volterra.

- 9.13 Whilst office vacancy rates across London are increasing, tenants are prioritising high quality, sustainable buildings and locations. This is evident in King's Cross / Euston Vacancy rates (5.6 %), being below the London average (9.9%) and the GLA recommendation for market choice (8.0%) (see Volterra report for further details).
- 9.14 The proposed office floorspace has been designed to be flexible and adaptable. This is to ensure the building can be adapted to meet the demands of future tenants, and includes the proposed regular floorplate, which is suitable for a range of workplace designs and can accommodate single, two or three tenant typologies. In addition, the ability to sub-divide and connect floorplates, by removing part of the floorplate to allow for double height spaces and enhanced connectivity between floors should the tenant require. Furthermore, the all-air ventilation system with no on-floor ductwork means spatial layouts can be changed without requiring reconfiguration of the ventilation system. This means the Proposed Development can adapt to changing requirements in the future and avoid the issues with lack of flexibility and adaptability in the existing tower.
- 9.15 There continues to be strong demand for well-located, high quality, flexible, sustainable commercial space. The Proposed Development has been designed with this in mind, to enable occupiers to respond and adapt to changing ways of working and continue to attract talent.

Enterprise Space (including Affordable Workspace)

- 9.16 The updated proposals reflect extensive consultation with Camden Council and the local community. The revised proposal provides for an Enterprise Space which comprises affordable workspace designed to support local entrepreneurs and small business, sitting alongside a programmed flexible space. This delivers on local need for affordable workspace, while facilitating connections between science and tech businesses, local partners and organisations and supporting wider skills and employment opportunities.
- 9.17 Joining a collection of affordable spaces that benefit the local community at Regent's Place, 746 sqm of Enterprise Space is proposed at ground and first floor level. A minimum 465 sqm of this space would be affordable workspace supporting local enterprises with space for start-

ups, at a 100% discount to market rents for ten years. The remainder of the space would be used flexibility for inclusive innovation, collaboration and knowledge sharing.

9.18 The flexible element of the Enterprise Space is located on the ground floor of the Euston Tower. The flexible space will be programmes for use by the local community – including local residents, and partners.

9.19 Ultimately, the Proposed Development continues to seek to increase the quantum of high-quality employment floorspace on the site which meets the demand for lab enabled space and modern, flexible, sustainable office space in the KQ, which is strongly supported by national, regional and local planning policies.

Mixed Use – Affordable Housing

9.20 The Planning Statement dated December 2023 (refer to paragraphs 10.64 – 10.78) sets out the assessment and justification explaining that housing on site is not appropriate and is therefore not required to be delivered on site in this instance, in accordance with criteria a, b, d, h and j of Local Plan Policy H2.

Off-site provision

9.21 The Applicant does not own any other site which is suitable for housing delivery connected with the Proposed Development and despite exploring various options on the open market, it has not been possible to acquire any other site for this purpose.

Payment-in-lieu (PiL) of housing

9.22 Following agreement with Camden Council and in accordance with Local Plan Policy H2, the Applicant has been in discussion with the Council to identify a Council owned site where a payment in lieu may be applied to support the delivery of affordable homes by the Council. An opportunity has been identified to deliver much needed additional affordable homes on the Council-owned Tybalds Estate and the Applicant has committed to a payment in lieu of £27m which could be used to deliver these. The Payment in Lieu will be secured via a Section 106 legal agreement.

9.23 Using the Council's Housing CPG (2021) to calculate a PiL, the total payment requirement is calculated to be £18,749,250.00. Therefore, the agreed £27m of funding exceeds the policy requirement and is considered a significant additional benefit of the scheme, contributing towards the delivery housing in the Borough. This amount has been agreed with the Council as an appropriate contribution to enable the delivery of the offsite affordable homes.

10 Design

10.1 In response to feedback since submitting the planning application in December 2023, the applicant team has revised the design of the Proposed Development, whilst retaining some of the core principles in the approach to the design. These are set out below.

10.2 *Massing and Design Concept*

10.3 The massing approach for the Proposed Development focuses on creating a more elegant and uniform building. The massing has evolved since the December 2023 version, stepping the massing in on Hampstead Road and creating a more regular form with the intention of creating a coherent form when viewed from all directions.

10.4 The corners were then filleted, further creating a slimming effect on the proposed massing, reducing the impact of the building in proposed views.

10.5 In a similar concept to the submitted scheme, the architects sought to split up the vertical massing to break down the scale of the building, with four separate quadrants, removing the tapering of the submitted design. This creates a slimmer and more vertical appearance when viewed from all directions, in direct response to LBC's comments suggesting a more 'elegant' massing.

10.6 The overall design approach is in line with London Plan policies D3, D4 and D5 and Local Plan Policy D1. Policy D9 is discussed in the below paragraphs.

Height

10.7 The height of the Proposed Development remains unchanged since the December 2023 submission. This is due to the restrictive LVMF view 19A.1 (Lambeth Bridge).

10.8 London Plan Policy D9 Tall Building sets out criteria upon which all proposed tall buildings should be assessed.

1. Visual Impacts

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

10.9 This remains unchanged from the December 2023 Planning Statement. The visual impacts of the Proposed Development have been rigorously assessed as part of the Townscape, Visual, and Built Heritage Assessment (“TVBHA”) submitted as part of the application, including a comprehensive assessment of long, mid-range and local views. Once complete the building has been assessed to be a beneficial addition to the townscape, by comparison to the existing building on the site. Further detail is set out in Chapter 11 of this Statement: Townscape and Heritage.

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

10.10 This remains unchanged from the December 2023 Planning Statement. Euston Tower is an existing, tall building, which aids legibility and wayfinding in the Euston area and the Proposed Development would continue to do so.

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

10.11 This remains unchanged from the December 2023 Planning Statement. The Proposed Development has been carefully designed by 3XN to an exemplary standard, using high quality materials which ensure that the appearance and architectural integrity of the building would be maintained throughout its life.

d) proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there

are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.

10.12 The revised colour, massing and form of the Proposed Development positively responds to comments from Historic England. A more muted tone complements the Listed Buildings in Fitzroy Square, in views from Regent's Park and in the context of the Grade II Listed BT Tower.

10.13 Whilst the submitted scheme was considered to create less than substantial harm by both Tavernor Consultancy and Historic England, the revisions improve upon this position and therefore address and conform with this part of the policy.

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

10.14 This remains unchanged from the December 2023 Planning Statement. Not applicable.

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

10.15 This remains unchanged from the December 2023 Planning Statement. Not applicable.

g) buildings should not cause adverse reflected glare.

10.16 This remains unchanged from the December 2023 Planning Statement.

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

10.17 This remains unchanged from the December 2023 Planning Statement.

2. Functional Impacts

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

10.18 This remains unchanged from the December 2023 Planning Statement.

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

10.19 This remains unchanged from the December 2023 Planning Statement.

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

10.20 This remains unchanged from the December 2023 Planning Statement.

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

10.21 This remains unchanged from the December 2023 Planning Statement.

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

10.22 This remains unchanged from the December 2023 Planning Statement.

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

10.23 This remains unchanged from the December 2023 Planning Statement.

3. Environmental Impact

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

10.24 Given the changes to the massing and articulation of the Proposed Development, the scheme has been tested by RDWI in wind tunnel tests to confirm the resulting impacts are acceptable. The results show that the revised scheme is an improvement upon the existing condition, as set out in the Environmental Statement, Volume 1 revised Chapter 11: Wind Microclimate.

10.25 Similarly, the revised massing has been assessed for Daylight and Sunlight impacts on surround residential properties. The results, as set out by Point 2 in their submitted Daylight Sunlight and Overshadowing Report, show that there has been an improvement in the impact on the nearest residential properties in comparison to the December 2023 submitted scheme.

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

10.26 This remains unchanged from the December 2023 Planning Statement.

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

10.27 This remains unchanged from the December 2023 Planning Statement.

4. Cumulative Impact

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

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

- 10.28 The publicly accessible space within the podium has evolved since the submission of the application in December 2023. The space has been rationalised and the programming and approach to how the space will operate has been worked through with LB Camden's Inclusive Economy team.
- 10.29 The Enterprise Space located at ground and first floor includes a flexible space for collaboration, knowledge sharing and to deliver projects designed for the benefit of the local community.
- 10.30 The lobby space will be publicly accessible, with a café at ground floor level. In addition to this, a separate café open to the public would be located at first floor level, fronting onto and benefiting from direct access from Regents Place Plaza via a newly created amphitheatre style staircase and accessible ramp. The publicly accessible terrace wraps around the southwestern corner of the tower, providing greening in addition to the £16m public realm improvements throughout the Plaza, Euston Road and Hampstead Road. Further details are set out within the submitted Design and Access Statement, prepared by 3XN.

11 Townscape and Heritage

- 11.1 This section sets out the assessment of the Proposed Development in terms of the townscape and heritage. Please refer to Section 12 of the Planning Statement dated December 2023 for the relevant planning policy applicable to this application.
- 11.2 This section considers the Proposed Development in respect of the character and quality of the surrounding townscape, key townscape views, notably LVMF 2A.2 & 2B.1 (Parliament Hill) and LVMF 4A.2 (Primrose Hill), and LVMF 19A.1 (Lambeth Bridge) and designated heritage assets on or around the Site.
- 11.3 A full analysis of the effects of the Proposed Development on designated heritage assets is included within the submitted Views Analysis and the updated TVHA (Volume 2 of the ES) prepared by Tavernor Consultancy and summarised below. This assessment has been updated throughout to reflect the amended planning application.

Assessment

- 11.4 There would be a clear change in the appearance of the Proposed Development in comparison to the existing Euston Tower. The proposed solidity and modulation of the façades, and the material palette and light off white tone of the GRC of the tower element and the contrasting terracotta tone of the podium, has drawn inspiration from the materials and architectural context of Camden. It would enhance the architectural quality, distinctiveness and legibility of the Euston Tower, marking the major junction of Euston Road and Tottenham Court Road/Hampstead Road. The distinct double-height crown of the Proposed Development, with rooftop plant concealed, would celebrate the 360° nature of the building, appropriate to its location, whilst also giving a recessive appearance of the uppermost part of the building when seen against the sky. The TVHA notes that the Proposed Development would be a worthy replacement building of landmark quality.
- 11.5 As set out in the TVHA, from some locations (such as looking south down Tottenham Court Road) the Proposed Development would appear perceptibly broader than the existing Euston Tower. From other locations including Tottenham Court Road its breadth would not be noticeably increased.

- 11.6 The fine grained, regular bays would provide the façades with a strongly ordered quality and human scale, and the projection of the gridded façade beyond the glazing would provide substantial depth and articulation, giving the façades a sculptural, carved character.
- 11.7 The proposed solidity and modulation of the façades, and the material palette have drawn inspiration from the materials and architectural context of Camden.
- 11.8 Also, in comparison to the December 2023 submitted scheme, the lighter tone of the tower element would appear recessive on the skyline and would complement the stone and stucco palette of sensitive listed buildings seen in the foreground of the tower from Regent’s Park and Fitzroy Square.
- 11.9 Overall, the amended Proposed Development would enhance the architectural quality and legibility of the Euston Tower, marking the major junction of Euston Road and Hampstead Road/ Tottenham Court Road.

12 Landscaping and Public Realm

- 12.1 This section sets out the assessment of the Proposed Development in terms of the proposed landscaping and public realm. Please refer to Section 13 of the Planning Statement dated December 2023 for the relevant planning policy applicable to this application.

Assessment

- 12.2 A Landscaping Statement Addendum has been prepared by DSDHA detailing the revisions to the Proposed Development. The Landscaping Statement submitted with the December 2023 Submission is considered as read and this Addendum deals only with the December 2024 Revisions and any updates to the public realm proposals as a result of the revisions.
- 12.3 As set out in the Landscaping Statement, the proposal seeks to enhance the public realm within Regent's Place Plaza and around the perimeter of Euston Tower. Early engagement was undertaken with Camden and TfL and has continued throughout the determination process to discuss the public realm strategy to enhance the pedestrian and cyclist experience. The proposals complement and respond to Camden Council's Bloomsbury Green Corridor project which was launched earlier this year. The ambition for the project is to identify a series of green spaces and links across the Bloomsbury area to connect the Euston station masterplan in the north to the River Thames in the South.
- 12.4 The landscaping proposals have been split into five key areas: Regent's Place Plaza and Podium; Hampstead Road; Euston Road; Brock Street; and Terraces and Biodiverse Roof. The Landscaping Statement Addendum sets out the proposals for each of the key areas.
1. Regent's Place Plaza – The Regent's Place Plaza proposals feature a series of activated and curated landscape elements, drawing inspiration from Hampstead Heath, arranged around a civic square. The plaza entrance to the public space and café on level 1 will be accessed via the terraced landscape stairs and ramp from the plaza.
 2. Hampstead Road – the available public realm space has been increased on Hampstead road in comparison to the submitted application, creating more opportunities for greening and seating to benefit the local community and pedestrians using the space. The Hampstead Road proposals include the Enterprise

Space entrance, street planting, bench seating, a connection to the main intersection and potential future TfL works. A minimum clear width of 6m will be maintained to accommodate existing and anticipated pedestrian movements. Landscape mounds have been placed to respond to micro-climatic conditions and buffer pedestrians from traffic.

3. Euston Road – The Euston Road proposals include the Lobby entrances, the tenant bicycle entrance, woodland mounds to shelter Regent’s Placa Plaza from Euston Road and a 4.5m wide shared cycle/pedestrian route
4. Brock Street – Brock Street would potentially be a key pedestrian route through to the Plaza should HS2 come forward. The proposals along Brock Street include the secondary Enterprise Space entrance, greening, benched seating, cycle parking and improved access to Regent’s Place Plaza.
5. Terraces and Biodiverse Roof – Planted terraces are proposed at levels 3, 6, 11, 20, 23 and 26 and would feature intensive planters to be enjoyed by the tenants at each of these levels. A proposed biodiverse roof will be incorporated under the PV panels at roof level.

12.5 Landscaped mounds are proposed throughout the landscaping to address the lack of available planting depth and, where required, mitigate against wind. The soft and hard landscaping features respond to movement, climate and the activity of those using the space.

12.6 In line with the requirements set out within Camden’s Public Open Space CPG, the Proposed Development is required to provide between 379 sqm (minimum provision requirement / maximum density scenario) and 480 sqm (maximum provision requirement / minimum density scenario) of additional public open space. This provision has been calculated by following the Employment Density Guide (3rd Edition), November 2015.

12.7 The CPG confirms that the public open space provision is calculated based on the provision of additional floorspace as part of development proposals, split by land use Net Internal Area (NIA).

12.8 The full breakdown of the public open space calculation is as follows:

B1a / General / Office / Professional Services Use	
Existing Floorspace	31,606 sqm (NIA)
Proposed Floorspace	34,456 sqm (NIA)
Total Uplift	2,850 sqm (NIA)
B1b / R&D Space - Density: 40-60 sqm	
Existing Floorspace	0 sqm (NIA)
Proposed Floorspace	16,476 sqm (NIA)
Total Uplift	16,476 sqm (NIA)

Public Open Space Requirement Calculations:

B1a Office Requirement	
$0.74\text{sqm} \times (2,850/12)$	175.75 sqm
B1b R&D Requirement	
'Minimum' Provision – 60 sqm Density	
$0.74\text{sqm} \times (16,476/60)$	203.2 sqm
'Maximum' Provision – 40 sqm Density	
$0.74\text{sqm} \times (16,476/40)$	304.1 sqm
Total Requirement (Office and R&D)	
Minimum Provision	379 sqm

Maximum Provision	480 sqm
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- 12.9 In line with CPG guidance, the minimum additional public open space required to be provided is 379 sqm. Overall, as set out in the Landscaping Statement Addendum, the Proposed Development would deliver 5,788 sqm of public open space. This represents an increase of 394 sqm from the total existing public open space and is therefore compliant with the minimum requirements (379 sqm) set out with the Public Open Space CPG.

Lighting

- 12.10 A Lighting Strategy Addendum is submitted with the December 2024 Revisions. The lighting system continues to be developed to align with wider sustainability goals.
- 12.11 Key routes are delineated through balanced, sensitive and appropriate use of light, to encourage clear movement and legibility across site in the hours of darkness, avoiding over lighting, minimising the effects of stark contrast and glare. A detailed lighting strategy will be developed at the detailed design stage and would reinforce Regent's Place's unique identity.

Greening

- 12.12 In respect of the UGF, the proposal seeks to provide significant planting opportunities together with a biodiverse roof and wetland sustainable drainage systems. The expected urban greening factor is over 0.3 in line with the London Plan Policy G6 target.
- 12.13 Greengage have undertaken an updated Biodiversity Net Gain Assessment. The existing biodiversity of the site to be 2.44 Habitat Units ('HU'). Based on the landscape plans prepared by DSDHA, the Proposed Development is predicted to provide a net gain of 0.84HU, which equates to a BNG figure of over 35%. This exceeds the legal requirement within the Environment Act 2021 and is in line with objectives set out within London Plan Policy G6.
- 12.14 The Proposed Development seeks to maximise public realm and landscaping opportunities and is considered to align with planning policy.

13 Energy and Sustainability

- 13.1 This section sets out the assessment of the Proposed Development in terms of energy and sustainability. Please refer to Section 14 of the Planning Statement dated December 2023 for the relevant planning policy applicable to this application.

Assessment

Energy

- 13.2 The revised Proposed Development continues the intentions of the December 2023 Submission to deliver an ambitious energy and carbon reduction strategy. Through a combination of innovative and best practice energy reduction measures, the Proposed Development achieves an overall reduction in regulated carbon dioxide emissions of 16% against Part L 2021. This is compared to a reduction of 14% for the December 2023 Submission.
- 13.3 As set out in Chapter 14 of the Planning Statement, it is acknowledged that the predicted on-site carbon reduction falls short of the GLA's 35% target against the current Part L (2021); however, in accordance with GLA Energy Assessment Guidance 2022, applicants are still expected to follow the energy hierarchy set out in London Plan SI2 to maximise carbon savings. This chapter includes an update on how the December 2024 Revisions have followed the hierarchy.
- 13.4 The previous parameters of the Part L 2013 notional building meant that the GLA's required 35% improvement were considerably more achievable when this was used as the baseline (compared to the more up-to-date and stretching 2021 regulations). Based on the current Proposed Development and servicing strategy, correlating with the performance against the Part L 2021 baseline it is estimated that the improvement against the Part L 2013 baseline would be 45%, demonstrating an improvement in comparison to the December 2023 scheme which saw an estimated 36% improvement.

- 13.5 Further details and explanation as to why the Proposed Development achieves an overall reduction in regulated carbon dioxide emissions of 16% against Part L 2021 are set out within the submitted updated Energy Statement, prepared by Arup.

Be Lean

- 13.6 The Proposed Development applies passive design principles including the specification of a high-performance building fabric and optimised solid to glazing ratio to reduce energy demand. Effective active systems are proposed to then meet this reduced demand as efficiently as possible.
- 13.7 Optimised glazing percentages to maximise daylight penetration but minimise overheating to the interior of the building. The façade elements that project horizontally and vertically adjacent to glazing are optimised to provide solar shading during peak scenarios but also allows for solar gain during winter months.
- 13.8 An underfloor ventilation system avoids the need for active cooling for large periods of the year through free cooling provided by largely un-tempered fresh air supplied by the on-floor AHUs, with cooling done by the high efficiency heat exchanger. The underfloor system also avoids the need for additional high-level mechanical services, significantly reducing embodied carbon.
- 13.9 A high-performance curtain wall façade to reduce space heating demand in winter and minimise the risk of summertime overheating is specified. Embodied carbon has been considered in the specification of the façade to provide a solution that reduces operational carbon but is also expected to lower embodied carbon when compared to other façade types, resulting in better overall performance from a whole life carbon perspective.

Be Clean

- 13.10 In accordance with the GLA heating hierarchy in Policy SI2, the Proposed Development is enabled for future connection into any local heat networks which can provide sufficient capacity to support the operation of the Proposed Development.

13.11 As no proposed district heat networks are currently available or expected to be available in the near future, on-site, low carbon heat generation using Air Source Heat Pumps is proposed.

13.12 The development is designed to avoid all on-site emissions, using an all-electric heating and cooling strategy, therefore no gas boilers or CHP are included in the scheme.

Be Green

13.13 Heating and cooling will be provided to the development by central heating and cooling plant consisting of air-cooled chillers and simultaneous air source heat pumps (ASHPs) to maximise the ability to share heat between spaces within the building.

13.14 Simultaneous heating and cooling heat pumps can utilise free cooling to maximise efficiency through mid-seasons.

13.15 The installation of PV panels is included within the scheme to contribute to the reduction of operational carbon emissions. Approximately 100 sqm is planned to be included spread across appropriate areas at Level 31 roof level.

13.16 The carbon off-set has been calculated on the remaining regulated carbon emissions post Be Green stage. A carbon offsetting price of £95/tonne of CO₂ has been used in line with the London Plan to calculate the resulting offset requirement, even though the campus is supplied by REGO-backed renewable energy. The cumulative shortfall in target CO₂ savings (over 30 years) is 7,537 tonnes which equates to an offset payment of £716,023 in line with part 'c' of London Plan policy S12. The offset payment would be secured via a S106 financial contribution.

Be Seen

13.17 The GLA's 'Be Seen' spreadsheet with performance indicators including contextual data, building energy use and carbon emissions for the Proposed Development has been submitted separately.

- 13.18 The energy performance of the Proposed Development has been assessed using a CIBSE TM54 compliant methodology to provide an assessment of regulated and non-regulated energy consumption.
- 13.19 A comprehensive NABERS Design for Performance assessment will be carried out during detailed design (RIBA Stage 3).

Sustainability

- 13.20 The Proposed Development adopts a sustainable approach across all areas of design, construction and operation, which has been at the forefront of design throughout the process. The objective is to deliver innovative approaches and best practice sustainability performance that is fit for now and the future.
- 13.21 The Proposed Development includes a range of sustainable strategies and approaches which are summarised below.
- 13.22 The Proposed Development is targeting BREEAM 'Outstanding' for the office and lab enabled floorspace, with BREEAM 'Excellent' for the retail areas.
- 13.23 Green roofs are proposed, in addition to planted areas and bio-retention features in the landscaping, as part of a Sustainable Drainage System ("SuDS") that manages surface water runoff and filters rainwater. Surface water runoff rates of 2.0l/s and a 68% reduction on the 1-in-100 year rainfall event is targeted compared to the existing Euston Tower.
- 13.24 Mitigation to reduce the urban heat island effect include green roofs, public realm planting and planting on terraces. The proposal seeks to target an UGF score of over 0.3, and a BNG of over 35% which exceeds the minimum targets in planning policy and legislation.
- 13.25 The proposal has been designed to be air quality neutral, which is achieved through an all-electric on-site infrastructure with no combustion for heating or cooling, save for provision for an on-site back-up generator only.

13.26 The development is entirely car free, save for two Blue Badge spaces located at basement level. A total of 890 long-stay cycle spaces are to be provided, with end of trip facilities to encourage active travel choices.

Whole Life Carbon

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

13.28 An updated Whole Life-cycle Carbon Assessment (WLCA) has been conducted by Sweco and GXN and is submitted with the December 2024 Revisions. The assessment was carried out in accordance with British Standard BS EN 15978:2011 and following guidance from the RICS PS (September 2023) and the GLA Whole Life-cycle Carbon Assessment Guidance.

13.29 The updated current analysis results in the following estimates:

- Upfront carbon [A1-A5]: 725 kgCO₂e/m² GIA including demolition
- Whole life-cycle embodied [A-C excl. B6&B7]: 1,240 kgCO₂e/m² GIA including demolition and sequestration
- Whole life-cycle carbon [A-C incl. B6&B7]: 2,397 kgCO₂e/m² GIA including demolition and sequestration

13.30 All figures include emissions due to demolition in the totals, which is not included in the totals in the GLA spreadsheet. The current upfront estimate is below the GLA upfront benchmark of 970 kgCO₂e/m² GIA for offices, though above the GLA aspirational benchmark (650 kgCO₂e/m² GIA). This is expected given the stage of the project and is expected to reduce during the detailed design and procurement stages as the design is developed, materials are specified contingencies reduced and construction strategies are confirmed.

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

Circular Economy

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

- 13.33 A thorough, three volume feasibility study has been carried out by GXN, which studies the condition and potential for reuse of the existing building, together with assessing options and opportunities for deconstruction and retention. It concludes that the optimum approach is to retain 31% of the existing structure, which includes the central core, basement and foundations.
- 13.34 Volume 3 of the Feasibility Study has been updated and submitted with December 2024 Revisions. Volume 3 builds on the findings of Volume One and Two where the opportunities for reuse, degrees of retention and refurbishment of the existing tower are assessed.
- 13.35 An innovative approach is being taken to minimising waste and carbon emissions through deconstruction and construction, identifying opportunities to reuse, recycle and upcycle building materials. The applicant and design team are seeking to test innovative new approaches for structural reuse of concrete and recycling of building glass at scale, with an ambition to publish findings from this work. 98% of the demolition waste would be diverted from landfill, 96% of the construction waste would be diverted from landfill and 95% of excavation waste would be put to beneficial use in accordance with this strategy.
- 13.36 Reused and/or high recycled content materials would be specified, where possible, for new construction targeting at least 24% recycled material by value.
- 13.37 The overall approach is to create a building which is flexible and adaptable for the long-term, reducing waste and avoiding the challenges of the existing building. Particular attention has therefore been taken to designing a structure which is flexible and adaptable to respond to and accommodate the needs of future uses and occupiers.
- 13.38 These objectives are in line with and exceed ambitions set out within the London Plan and Local Plan and Camden Planning Guidance Energy Efficiency and Adaptable CPG

14 Transport and Servicing

- 14.1 This section sets out the assessment of the Proposed Development in terms of transport and servicing. Please refer to Section 15 of the Planning Statement dated December 2023 for the relevant planning policy applicable to this application.

Assessment

Transport

- 14.2 The updated Transport Assessment and associated transportation documents have been prepared by Velocity. The reports have been prepared with a focus on the Healthy Streets Approach. The site is located within a highly accessible area and has an 'Excellent' PTAL of 6b. The proposal has been designed to be car free (with the exception of two blue badge spaces within the basement) and to promote walking and cycling. The proposal would not have an adverse impact on the existing transport network or highway safety.
- 14.3 The proposal seeks to promote pedestrian movement around the base of the tower by providing safe and inviting public realm.
- 14.4 The proposal includes 890 long stay cycle spaces within the basement which would be provided as Sheffield stands, two tier cycle stands, foldable bicycle parking and larger Sheffield stands. The proposal would also include 593 lockers, 74 showers (including two accessible showers) and six toilets (including two accessible WCs). Cycle maintenance facilities and water dispensers are also envisaged.
- 14.5 The proposal also includes 100 short stay cycle parking spaces which would be provided in the public realm.
- 14.6 A cargo bike facility at both ground and basement levels will be provided to encourage the use of sustainable freight.
- 14.7 In respect of pedestrian comfort, it is considered that the proposed footpaths would comfortably meet the forecast peak pedestrian flows.

Deliveries and Servicing

- 14.8 An updated draft Delivery and Servicing Plan has been submitted with the December 2024 Revisions to reflect the updated Proposed Development.
- 14.9 The Proposed Development continues to utilise the existing vehicle access points into the site via Longford Street and Drummond Street. Loading and unloading is proposed off street within the shared basement. Eight servicing bays are proposed within a shared servicing area. It is anticipated that the Proposed Development would generate 96 deliveries per day.
- 14.10 Gas deliveries would occur at ground floor level in the northwest corner of Euston Tower. The specialist delivery vehicle would deliver the bottles and piped gas via Triton Square and Brock Street in an area close to the gas store. These deliveries would be managed by the Regent's Place management team. The public realm has been designed to accommodate gas deliveries whilst continuing to accommodate pedestrian flows.
- 14.11 Deliveries made by cargo bike would take place via the existing basement ramp. Two basement cargo bike spaces would be provided. Two additional cargo sized parking spaces would also be provided at ground level.
- 14.12 It is envisaged that a final Delivering and Servicing Plan would be secured via planning conditions or a planning obligation. The proposal therefore accords with planning policy.

Waste

- 14.13 An updated Outline Waste Management Strategy has been submitted with the December 2024 Revisions to reflect the updated Proposed Development.
- 14.14 The existing waste management operations are currently segregating materials effectively, consolidating all waste streams from the wider Regent's Place campus into residual, DMR, food and glass waste. The waste strategy for the Proposed Development will continue to employ the same principles of consolidation and fit within the existing site-wide waste strategy for the Regent's Place Estate.

14.15 The December 2024 Revisions include 60-euro bins/wheeled bins and a portable waste compactor. Clinical waste would be stored within segregated yellow waste bins. Laboratory waste bins would be collected and stored within the basement. This would be managed by the on-site facility management team.

14.16 In light of the above, the Proposed Development meets regional and local waste policies.

15 Amenity

- 15.1 This section sets out the assessment of the Proposed Development in terms of amenity, which includes wind and microclimate, air quality, noise, and daylight/sunlight. Please refer to Section 16 of the Planning Statement dated December 2023 for the relevant planning policy applicable to this application.
- 15.2 Assessment
- 15.3 **Wind & Microclimate**
- 15.4 As set out within the Planning Statement, the existing public realm is a windy environment despite measures being taken over the course of last 20 years to mitigate against the impact of wind, in the form of bolt-on canopies to the existing building and landscaping in the public realm. The wind and microclimate within Regent’s Place and along Euston Road, Brock Street and Hampstead Road have been a key theme in the feedback throughout the co-design process and public consultation. Accordingly, the objective to improve the current position has been a key objective throughout the design process.
- 15.5 Following the updates to December 2023 Submission, consultation with Arup on the wind and micro-climate has been ongoing throughout the design process. The December 2024 Revisions have been subject to multiple wind tunnel tests and Computational Fluid Dynamics (“CFD”) assessments to assist with evolving the design and develop wind mitigation. The final scheme has been tested through wind tunnel testing, adopting the Lawson Comfort Criteria, which describes windiness in terms of acceptability for sitting, standing and walking and compared with the existing baseline.
- 15.6 In summary, the Proposed Development includes embedded wind mitigation measures, which have been informed by rigorous and iterative testing in both the wind tunnel and using CFD modelling. The Proposed Development includes landscaped ‘mounds’ together with a variety of planting measures to further disperse wind where necessary at ground floor level. With the proposed landscaping and mitigation measures in place, the Proposed Development improves the wind microclimate position in the public realm, in accordance with regional and local planning policies.

Air Quality

15.7 As set out within the Chapter 8 Air Quality Addendum, the December 2024 Revisions will not affect the air quality assessment submitted with the December 2023 Submission. The Proposed Development still includes the following relevant design measures and is assessed as air quality neutral:

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

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

Noise

15.9 A Noise Impact Assessment Statement of Conformity was prepared by Hann Tucker Associates to support the December 2024 Revisions. The letter confirms that Hann Tucker Associates have reviewed the December 2024 Revisions with respect to the acoustic aspects of the Noise Impact Assessment report dated December 2023 and are satisfied that the revisions do not alter the impacts and conclusions as presented in the report. The report confirms the Proposed Development would meet Camden's acoustic thresholds. Planning conditions would be imposed to ensure relevant noise thresholds are not exceeded by the plant to be installed as part of the Proposed Development.

15.10 The proposal would require vehicle deliveries into the basement. In addition, gas bottle deliveries would be required at ground level. A final delivery and servicing management plan would be conditioned to minimise any noise and disturbance.

- 15.11 A Construction Management Plan (CMP) detailing measures to mitigate potential noise and vibration impacts upon nearby noise sensitive premises during construction would also be secured via a planning condition or obligation. The principles of 'Best Practicable Means (BPM)', as defined in the Control of Pollution Act, 1974, would be used to ensure the protection of nearby sensitive receptors.
- 15.12 The proposal therefore meets national, regional and local acoustic policies.

Daylight and Sunlight

- 15.13 A Daylight and Sunlight Addendum report for the Proposed Development has been prepared by Point 2 in accordance with the BRE guidelines.
- 15.14 The Daylight and Sunlight Addendum concludes that 22 of the 28 residential properties (refer to paragraph 7.10 of the report to identify these properties) assessed fully adhere to the BRE Guidelines for daylight (VSC and NSL) and sunlight (APSH) and therefore it can be concluded that these properties would not experience any noticeable effects upon their daylight and sunlight amenity as a result of the Proposed Development. This is consistent with the December 2023 Submission.
- 15.15 Therefore, as per the December 2023 Submission, six properties experience transgressions from the baseline BRE Guidelines. The updates to the analysis of the properties are fully detailed within Section 7 of Point 2's Daylight and Sunlight Addendum report as well as within the Daylight and Sunlight Addendum chapter of the Environmental Statement Addendum.
- 15.16 40-60 Hampstead Road would see transgressions to 12 out of 62 assessed windows for VSC and 11 out of 60 assessed rooms for NSL. 1-6 Tolmers Square would see transgressions to 6 out of 95 assessed windows for VSC and all rooms satisfy the BRE Guidelines in regard to NSL.
- 15.17 Both properties have protruding balconies or deck access and therefore a 'without balconies' assessment was undertaken to determine whether the presence or overhang of the residential balconies is the main factor in the alternations as allowed for within the BRE Guidelines. The results for this alternative assessment show full compliance with the BRE

Guidelines which demonstrates that the presence of the overhanging walkways/balconies are a key contributing factor in the relative alterations to daylight.

- 15.18 164-166 Drummond Street and 175 Drummond Street, all the windows adhere to the BRE Guidelines in respect of VSC. For 164-166 Drummond Street, 13 out of the 17 rooms adhere to the baseline BRE Guidelines and at 175 Drummond Street, 10 out of the 14 rooms will adhere to the baseline BRE Guidelines. From the NSL assessment, the transgressions experience minor alterations between 21%-28% from the BRE Guidelines, and all relate to bedrooms which have a lesser requirement for daylight as referenced in the BRE guide (para 3.2.3) – “Kitchens and bedrooms are less important, although care should be taken not to block too much sun.”
- 15.19 In respect of Schafer House, all of the windows assessed adhere to the BRE Guidelines for the VSC assessment. For the NSL assessment, one bedroom out of the 150 assessed experiences an alteration in NSL of 22%, which is only fractionally beyond the BRE Guidelines. As set out above, it is noted that bedrooms are considered by the BRE to be less important for NSL.
- 15.20 The Triton Building (20 Brock Street) is the nearest residential property, located immediately north of the site. When considering the VSC daylight assessment, 287 of the 298 windows will adhere to the BRE Guidelines criteria (the December 2023 Submission assessed 215 of the 298 windows would meet the BRE Guidelines). All 11 windows which do not adhere to the BRE Guidelines criteria experience minor transgressions between 21-23%, which is fractionally beyond the 20% allowed for within the BRE. All 140 rooms meet the BRE Guidelines criteria in respect of NSL.
- 15.21 This property has projecting balconies and therefore Point 2 carried out a ‘without balconies’ assessment to understand whether the presence of the overhang or the obstruction (i.e., the Proposed Development) are a key contributing factor in the alterations in VSC to these windows. When considering the results for this alternative assessment, all windows meet the BRE Guidelines. This confirms that the presence of the balconies is a key contributing factor in the relative alterations in VSC.

- 15.22 With regards to sunlight, all the rooms relevant for analysis will adhere to the BRE Guidelines for APSh, thus there will be a negligible change in sunlight to this property.
- 15.23 Point 2 have also updated the Sun on Ground (overshadowing) assessment for the amenity areas serving 1-6 Tolmers Square, the Triton Building, George Mews and Regents Place Plaza. The results demonstrate that all surrounding amenity areas would remain fully compliant with the BRE Guidelines with the Proposed Development.
- 15.24 As a result, Point 2 do not consider that the Proposed Development would cause unacceptable harm to the surrounding neighbouring properties. The proposals therefore meet national, regional and local policy.

16 Other Considerations

16.1 This section sets out the assessment of the Proposed Development against other relevant material planning considerations. These are as follows:

- a. Flood Risk / Drainage / Sustainable urban Drainage System (“SuDS”);
- b. Archaeology; and
- c. Fire.

16.2 Please refer to Section 17 of the Planning Statement dated December 2023 for the relevant planning policy applicable to this application.

Assessment

Flood Risk / Drainage / SuDS

16.3 A Flood Risk Addendum has been prepared by Arup detailing the revisions to the Proposed Development. An updated Flood Risk Assessment was submitted to the Council in March 2024, this report is considered as read and this Addendum deals only with the December 2024 Revisions and any updates to the assessments as a result of the revisions.

16.4 The Flood Risk Addendum confirms that although minor updates have been made to the design and location of planters and trees in the public realm as well as the building design, these alterations do not affect flood risk, and the Flood Risk Assessment dated March 2023 remains applicable. Therefore, the Proposed Development would not give rise to a flood risk elsewhere and the existing drainage network would be retained.

16.5 A Drainage and SuDS Strategy Addendum has been prepared by Arup detailing the revisions to the Proposed Development. An updated Drainage and SuDS Strategy was submitted to the Council in March 2024, this report is considered as read and this Addendum deals only with the December 2024 Revisions and any updates to the assessments as a result of the revisions.

16.6 Therefore, the Drainage Strategy Addendum solely assesses the surface water captured from within the building footprint (i.e. roof area).

16.7 The proposal for the roof area includes rainwater harvesting and attenuation tanks at basement level. The surface water discharge rate would be limited to 2.0l/s and the total attenuation equates to 280 m³.

16.8 It is therefore concluded that the proposal meets planning policy in respect of flood risk and drainage.

Archaeology

16.9 An Archaeological Desk-Based Assessment Addendum has been prepared by MOLA. The report concludes that the December 2024 Revisions will not cause any new or greater impacts on the archaeological remains reported in the Archaeological Desk Based Assessment dated December 2023. The report concludes that the site has no designated heritage assets on site and has a low to moderate potential for prehistoric remains and remains from all other periods.

16.10 The proposal meets the policy requirements in respect of archaeology.

Fire

16.11 A Fire Statement Addendum has been prepared by Arup. The Addendum report sets out the key changes which have been introduced since the original Fire Statement dated December 2023.

16.12 The proposed site will be provided with a full commercial sprinkler automatic suppression system. This system will be designed in accordance with BS EN 12845: 2015 (+ A1 2019). In accordance with BS 9999: 2017, the proposed site will be served by two central firefighting shafts as the building has a topmost occupied floor greater than 18m above access level and a floor plate exceeding 900sqm. The two firefighting cores will be pressurised in accordance with BS EN 12101-6: 2005. To mitigate potential counter flow of the Fire Service with escaping occupants escaping via the stairs, an additional 500mm of width is provided in addition to the width required for means of escape. Muster point locations are provided within the fire

service access corridor, in a location which does not impede means of escape or fire service access. A number of passive fire protection measures are also proposed.

16.13 The proposal meets planning policies relating to fire safety.

17 Planning Obligations and Community Infrastructure Levy

Community Infrastructure Levy (CIL)

- 17.1 On 6 April 2010 the Community Infrastructure Levy (CIL) Regulations 2010 came into force. The regulations require all planning obligations to be:
- ii. Necessary to make the development acceptable in planning terms;
 - iii. Directly related to the development; and
 - iv. Fairly and reasonably related in scale and kind to the development.
- 17.2 Paragraph 55 of the NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Paragraph 57 echoes the requirements set out in points i-iii above.
- 17.3 The supporting text of Policy C2 (Community facilities) of Camden's Local Plan (Paragraph 4.26) states that LBC will seek Section 106 planning obligations, where it is legitimate to do so, to ensure that the additional demand development places on existing community infrastructure and services is met.
- 17.4 The Proposed Development would give rise to a CIL payment, to help fund the provision of physical and social infrastructure in Camden.
- 17.5 Further guidance on planning obligations and CIL contributions is provided in Supplementary Planning Guidance (SPG) and Documents (SPDs) adopted by the Mayor of London and Council, respectively.

Community Infrastructure Levy

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

- Phase 0 – Preparatory and enabling works;
- Phase 1 – Deconstruction; and
- Phase 2 – Construction.

Planning Conditions and Obligations

17.7 There has been no change to the Developer Contributions CPG (March 2019) since the December 2023 submission.

17.8 As set out in the Planning Statement and above, it is proposed that the Proposed Development would be phased. Discharge of planning conditions and obligations would be linked to the relevant phases (or sub-phases) of the Development as appropriate.

Draft Heads of Terms

17.9 It is envisaged that the following obligations would be secured via the Section 106 Agreement between Camden and the Applicant:

- Payment-in-Lieu of £27m to be directed towards the delivery of affordable housing by the Council on the Council owned Tybalds Estate;
- Pedestrian, Cycling and Environmental Contribution;
- Open Space Contribution;
- Highways Works;
- Car Free Development (including Blue Badge Parking Spaces);
- Deconstruction Management Plan;
- Construction Management Plan;
- Deconstruction and Construction Management Plan Bond;
- Construction Working Group;
- Energy and Sustainability (including 'Be Seen' monitoring);
- Carbon Offsetting;
- Local Employment requirements, including jobs for Camden residents, apprenticeships and work experience placements, in accordance with the Euston Tower Employment and Skills Delivery Plan;
- Employment and Skills Contribution;

- Local Procurement;
- Delivery, Service and Waste Management Plan;
- Travel Plan;
- Operational Management Plan; and
- Enterprise Space Management Plan (including Affordable Workspace).

18 Summary and Conclusions

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

- Ensuring that the future use of Euston Tower is built upon identified need and contributes to a thriving local, regional and national economy for our ever-changing world.
- Reimagining the public spaces of Regent's Place Campus, creating safe, inclusive, connected and sustainable spaces for Camden's communities.
- Contributing £27m towards meeting Camden's housing needs.

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

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

Bringing the Building Back into Use

18.7 Euston Tower is no longer fit for purpose. The proposed design will retain 31% of the original structure, through partial deconstruction, support an ambitious circular economy strategy, and deliver a greener, all-electric building, fit for the future. We are targeting minimum 21% glass reuse and recycling as building glass (up to 81% subject to feasibility and ongoing discussions with the supply chain); 100% steel and aluminium reuse and recycling; testing and piloting concrete use, where possible, within the project.

Workspace for Pioneers

18.8 The Proposed Development would deliver workspace for innovative businesses, directly responding to and accelerating the success of the Knowledge Quarter.

Enterprise Space

18.9 Joining a collection of affordable spaces that benefit the local community at Regent's Place, 746 sq m of Enterprise Space, with a minimum 465 sq m of affordable workspace at a 100%

discount to market rents for ten years, supporting local enterprise with space for start-ups, inclusive innovation, collaboration and knowledge sharing.

Employment Opportunities for Camden Residents

- 18.10 Working in partnership with Camden’s Inclusive Economy Team, we have developed the Euston Tower Employment and Skills Delivery Plan – a roadmap for enabling employment and skill development opportunities for local people through the Euston Tower project.
- 18.11 Present (2023-25): work experience, internships and short-term employment opportunities linked to planning and design.
- 18.12 Future (2026-38): work experience, internships and employment opportunities linked to construction and end-use.
- 50 two-week work experience placements;
 - 160 apprenticeships across design/construction & STEAM; and
 - 70 jobs for local people, paid London Living Wage.

£16M Investment in the Public Realm

- 18.13 £16m investment into new and revitalised outdoor public spaces and routes to create a safe, accessible, connected, green and creative environment for all of the community to enjoy. A cohesive approach to architectural and landscape design will mitigate the severe wind conditions experienced at the base of Euston Tower today.

Over £37M Investment in Social and Physical Infrastructure

- 18.14 In discussion with the Council and in line with Camden planning policy an opportunity to deliver much needed additional affordable homes on the Council-owned Tybalds Estate has been identified and the Applicant has committed to a payment in lieu of £27m which could be used to deliver these.
- 18.15 Over £10m in CIL and S106 (employment and skills) contributions.

18.16 The December 2024 Revisions to the Proposed Development meet planning policies at a national, regional and local level and the vision for re-imagining Euston Tower, while increasing the public benefits for Camden and its communities, and therefore should be approved.