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FAO: David Fowler

Your Ref: 2023/5240/P

23 December 2024

Dear David

Euston Tower, 286 Euston Road, London
2023/5240/P Application for Full Planning Permission – National Planning Policy Framework 2024

We write on behalf of our Client, British Land Property Management Limited ("the Applicant"), in relation to the proposals at Euston Tower, 286 Euston Road, London, NW1 3DP ("the Site") following formally submitting amendments to planning application reference 2023/5240/P on 12 December 2024.

The Government released the revised National Planning Policy Framework (hereafter "NPPF") on 12th December 2024, the same day as the submission of the revised documents to the London Borough of Camden. The revised application documents were written prior to the release of this document and accordingly refer to the 2023 version of the NPPF.

Gerald Eve has since reviewed the December 2024 version of the NPPF against the 2023 version and does not consider that the conclusions of the assessment in the submitted Planning Statement would change when assessed against the revised policy document. However, the revised NPPF does go significantly further in supporting the principle of the development, which is set out further in this letter. The revised NPPF is now a material consideration and importantly, will be at the time of determination of the application. We have highlighted below the key paragraphs that we consider are particularly relevant to the planning considerations for this application.

Principle of Development

Paragraph 125 remains largely as per the 2023 version, save for the addition of a critical sentence which significantly supports the principle of the Proposed Development.

This is set out below:

125. Planning policies and decisions should (part c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict or contaminated unstable land. (additional text underlined).

The assessment of the application has concluded that no substantial harm would be caused as a result of the Proposed Development in terms of land use, heritage, sustainability, transport or any other technical discipline. The additional text added into Paragraph 125 therefore strongly supports the principle of the development of Euston Tower to provide a mixed use commercial building in this brownfield location.

Land Use Considerations

Paragraph 86 and 87 have been amended to read as follows (additional text underlined):

86. Planning policies should:

a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics;

d) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

e) be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.

87. Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:

a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections);

c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience. (additional text underlined).

The additional text in paragraph 86 and 87 provides overwhelming support for knowledge based industries and growth-driving sectors identified in the government's industrial strategy, including life sciences, digital

and technologies, synonymous with the objectives of the Knowledge Quarter within which the Euston Tower sits. The Proposed Development would provide new, high quality and flexible commercial floorspace which will significantly contribute to meeting the ever increasing demands from the modern economy.

Conclusion

This letter summarises the key changes set out in the revised NPPF (dated 2024) which are relevant and positive in relation to the Proposed Development at Euston Tower (LPA ref. 2023/5240/P). The additions to the NPPF overwhelming support the principle of development including the proposed land uses within the application.

Yours sincerely

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